

**BEFORE THE PUBLIC SERVICE COMMISSION
OF THE STATE OF MISSOURI**

In the Matter of Union Electric Company d/b/a)
Ameren Missouri's 2020 Utility Resource Filing) File No. EO-2021-0021
Pursuant to 20 CSR 4240 – Chapter 22)

MOTION TO INTERVENE OF ARMADA POWER, LLC

COMES NOW Armada Power, LLC (“Armada”) and, pursuant to Commission Rule 20 CSR 4240-2.075, files this Motion to Intervene, and in support thereof respectfully states as follows:

1. On September 27, 2020, Union Electric Company d/b/a/ Ameren Missouri filed its 2020 Integrated Resource Plan (“IRP”), as required by the Commission’s Electric Utility Resource Planning Rule, 20 CSR 4240-22. The Commission’s deadline to file applications to intervene in this matter was October 30, 2020.

2. On or about January 1, 2021, Armada made a corporate decision to offer its products and services in new markets, and the State of Missouri was identified as one such market. Because Armada did not begin actively pursuing Missouri as a market until January 2021, it is admittedly late in filing this Motion to Intervene. However, Armada is respectfully requesting that the Commission, pursuant to Commission Rule 20 CSR 4240-2.075 (10), grant this Motion to Intervene. Pursuant to Commission Rule 20 CSR 4240-2.075 (10), Armada hereby states that it accepts the record established in this case, including the requirements of any orders of the commission, as of the date this motion is filed.

3. Armada is a corporation duly incorporated under the laws of the State of Delaware. Armada’s principal office is located at 230 West St. Columbus, Ohio 43215. Armada creates technology solutions for the electric utility industry, and Armada’s mission is to make the power grid more reliable, renewable, and cost effective. Armada’s product line is a combination smart and secure water heater controller that combines with its software platform FleetCommander. Armada uses FleetCommander to turn thousands of connected water heaters into flexible energy storage for the power grid while minimizing the impact to the water heater user. The contact information for Armada’s attorneys is set forth below.


4. Armada appreciates and supports Ameren's plan to incorporate demand response and demand side management programs in addition to time of use functionality for residential customers. Armada strongly suggests that the IRP should incorporate a combined demand and grid control program for residential customers through a behind the meter thermal storage program. The IRP currently separates certain functions between demand response and grid modernization. Armada recommends that Ameren incorporate a behind the meter thermal storage program using water heater demand control to combine multiple functions through a single program. Accordingly, Armada has a direct interest in this matter, and as such, intervention is in the public interest, as Armada's participation may aide the Commission in addressing the implications associated with this matter.

5. Armada notes that the deadline for parties to submit reports and comments is March 31, 2021. In the interest of time, and with the hope that the Commission grants this Motion to Intervene, Armada is respectfully submitting its comments (attached hereto as Exhibit 1) and its testimony (attached hereto as Exhibit 2) with respect to this docket.

6. Communications, correspondence, orders and decision in this matter should be addressed to the undersigned.

WHEREFORE, Armada Power, LLC respectfully requests that the Commission issue its order granting intervention and permitting Armada Power, LLC to intervene and participate as a party in all respects in this proceeding.

Respectfully requested,

By: 

Daniel M. Flynn #63485

Neil F. Flynn # 64382

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Attorneys for Armada Power, LLC

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CERTIFICATE OF SERVICE

The undersigned certifies that a true and correct PDF copy of the foregoing Motion to Intervene of Armada Power was served on all parties of record on this 30th day of March, 2021 via email to the names and addresses set forth below.

By: 

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Missouri Public Service Commission

Service List for Case No. **EO-2021-0021** Last Updated: **1/6/2021**

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