

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

In the Matter of the Consideration of Adoption of the PURPA Section 111(d)(16) Integrated Resource Planning Standard as Required by Section 532 of the Energy Independence and Security Act of 2007.)	
)	
)	Case No. EO-2009-0247
)	
)	
In the Matter of the Consideration of Adoption of the PURPA Section 111(d)(17) Rate Design Modification to Promote Energy Efficiency Investments as Required by Section 532 of the Energy Independence and Security Act of 2007.)	
)	
)	Case No. EO-2009-0248
)	
)	
In the Matter of the Consideration of Adoption of the PURPA Section 111(d)(16) Consideration of Smart Grid Investments Standard as Required by Section 1307 of the Energy Independence and Security Act of 2007.)	
)	
)	Case No. EO-2009-0249
)	
)	
In the Matter of the Consideration of Adoption of the PURPA Section 111(d)(17) Smart Grid Information Standard as Required by Section 1307 of the Energy Independence and Security Act of 2007.)	
)	
)	Case No. EO-2009-0250
)	

**APPLICATION OF
MIDWEST INDEPENDENT TRANSMISSION
SYSTEM OPERATOR, INC. TO INTERVENE**

The Midwest Independent Transmission System Operator, Inc. (“Midwest ISO”), by and through its counsel and pursuant to 4 CSR 240-2.075, applies to intervene in the above-referenced cases. In support of this Application, Midwest ISO states:

1. Midwest ISO is a not-for-profit corporation organized and existing under and by virtue of the laws of Delaware, with its principal place of business at 720 City Center Drive, Carmel, Indiana, 46032.

2. The Midwest ISO is a regional transmission organization (RTO) that monitors and controls the bulk electric system, for its transmission owner members and system users, and

provides all customers with open access transmission service. The Federal Energy Regulatory Commission approved the Midwest ISO as the nation's first RTO on December 20, 2001. On February 1, 2002, the Midwest ISO began providing regional transmission service for the movement of bulk power over the transmission facilities within its footprint. Midwest ISO has operated real-time and day-ahead energy markets since April 1, 2005, and an ancillary services market since January 6, 2009.

3. Communications in this matter should be addressed to:

Karl Zobrist
Roger W. Steiner
Sonnenschein Nath & Rosenthal LLP
4520 Main Street, Suite 1100
Kansas City, MO 64111
Telephone: 816-460-2400
Fax: 816-531-7545
Email: kzobrist@sonnenschein.com
Email: rsteiner@sonnenschein.com

Stephen G. Kozey
Vice President and General Counsel
Keith L. Beall
State Regulatory Attorney
Midwest Independent Transmission System Operator, Inc.
P.O. Box 4202
Carmel, IN 46032-4202
Telephone: (317) 249-5400
Email: skozey@midwestiso.org
Email: kbeall@midwestiso.org

4. As a functioning RTO, Midwest ISO is the sole provider of transmission service for those entities such as Union Electric Co., d/b/a/ AmerenUE and the City of Columbia that have transferred functional control of their transmission assets to Midwest ISO. As the transmission provider, Midwest ISO has a responsibility for the planning and operation of the regional transmission grid. The manner in which electricity is delivered to customers is a complex system. The construction and operation of generation facilities, and the management of demand

response and energy efficiency mechanisms influence both the design and operation of the transmission system. Likewise, the operation of generation and demand response resources affect the functioning of the Midwest ISO's energy markets. Thus, Midwest ISO has an interest in how these interrelated issues affect its Missouri members and Missouri stakeholders, which may, in turn, affect the Midwest ISO's planning and operation of the regional transmission system and its energy markets. As a result, Midwest ISO is vitally interested in Smart Grid Investment Standards and Smart Grid Information Standards, and the manner in which the Commission will undertake its examination of those issues, pursuant to the Energy Independence and Security Act of 2007. These interests are, therefore, different from those of the general public.

5. In addition, Midwest ISO submits that its Application to Intervene in these cases meets the requirements of the good cause standard because Midwest ISO will be able to provide the Commission its perspective on day-to-day operations of the regional transmission grid under its control, the operation of its energy markets, and relevant information related to Smart Grid standards and components.

6. Although this Application is made after the January 16, 2009 date set in the Commission's Order of December 17, 2009 for interventions, Midwest ISO accepts the record as it stands. The Commission's granting of this Application will not prejudice any party. Furthermore, Midwest ISO respectfully submits that the Commission and other intervenors will benefit by allowing Midwest ISO to participate in the following areas: 1) responding to issues that arise from this docket that may affect or impact the Midwest ISO's roles and responsibilities, 2) assisting with and participating in the discussions regarding Smart Grid Investment Standards

and Smart Grid Information Standards, among others, that may affect grid coordination needs and operations.

7. Midwest ISO is unable to state the position it will take in the above dockets at this time.

WHEREFORE, Midwest ISO respectfully requests permission to intervene out of time in the above referenced dockets.

/s/ Karl Zobrist
Karl Zobrist, MO #28325
Roger W. Steiner, MO #39586
Sonnenschein Nath & Rosenthal LLP
4520 Main Street, Suite 1100
Kansas City, MO 64111
Telephone: (816) 460-2545
Facsimile: (816) 531-7545
Email: kzobrist@sonnenschein.com
Email: rsteiner@sonnenschein.com

Attorneys for Midwest Independent Transmission
System Operator, Inc.

Certificate of Service

I hereby certify that a true and correct copy of the foregoing was e-mailed on this 23rd day of January, 2009, to the persons on the Commission's service list in this case.

/s/ Karl Zobrist
Attorney for Midwest Independent Transmission
System Operator, Inc.