

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

In the Matter Application of Union Electric            )  
Company d/b/a Ameren Missouri for Approval        )  
of a Tariff Setting a Rate for Electric                )  
Vehicle Charging Stations                                )        **Docket No. ET-2016-0246**

**APPLICATION FOR INTERVENTION OF BRIGHTERGY, LLC**

COMES NOW Brightergy, LLC (“Brightergy”) and in support of its Application for Intervention states the following:

1. Brightergy is a limited liability company organized under the laws of the State of Missouri with its principal place of business at 1712 Main Street, 6th Floor, Kansas City, MO, 64108.
2. The Commission issued its *Notice of Tariff Filing and Order Establishing Time to File Recommendations* in this docket on April 15, 2016, in which it set August 31, 2016 as the deadline for intervention in this docket.
3. The issues raised by Union Electric Company d/b/a Ameren Missouri (“Ameren” or the “Company”) impact policies related to energy policy and cost in the State of Missouri.
4. As a major provider of energy services in the Company’s service territory, Brightergy has an interest in the Company’s proposals in this docket different from that of the general public.
5. Brightergy has testified in favor of similar programs in previous Commission dockets.<sup>1</sup>
6. Brightergy’s unique set of expertise will provide a perspective to the Commission’s decision making that would otherwise be lacking, and it is therefore in the public’s interest to allow Brightergy to intervene.

---

<sup>1</sup> See Exhibit 450, Surrebuttal Testimony of Adam Blake on behalf of Brightergy, LLC, Docket number ER-2014-0370, June 5, 2015.

7. Correspondence, communications, orders and decisions in this case may be directed to Brightergy's undersigned legal counsel.

8. Brightergy does not yet have a position on the issues in this case and reserves the right to take positions on specific issues as this case proceeds.

**WHEREFORE**, Brightergy respectfully requests that the Commission grant its Application for Intervention in the above-styled case.

Respectfully submitted,

/s/ Andrew Zellers

Andrew Zellers MO. Bar No. 57884

General Counsel and Vice President for Regulatory Affairs

Brightergy, LLC

1712 Main Street, 6th Floor, Kansas City, MO 64108

andy.zellers@brightergy.com

office: +1.816.866.0555

fax: +1.888.511.0822

**Attorney for Brightergy, LLC**

#### **CERTIFICATE OF SERVICE**

I do hereby certify that a true and correct copy of the foregoing document has been served electronically this 31st day of August, 2016, to all parties on the Commission's service list in this case.

/s/ Andrew Zellers