

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

In the Matter of the Application of Union Electric       )  
Company d/b/a/ Ameren Missouri for Permission and       )  
Approval and a Certificate of Convenience and                )  
Necessity Authorizing it to Construct a Wind                )  
Generation Facility    )

**File No. EA-2019-0021**

**MISSOURI DIVISION OF ENERGY**  
**APPLICATION TO INTERVENE**

COMES NOW the Missouri Department of Economic Development – Division of Energy (“DE”) and, pursuant to Missouri Public Service Commission (“Commission”) Rule 4 CSR 240-2.075, respectfully requests that the Commission grant intervention to DE in the above-styled matter. For its Motion to Intervene, DE states as follows:

1. On October 22, 2018, Union Electric Company d/b/a/ Ameren Missouri (“Ameren”) filed an application with the Commission seeking an order granting a Certificate of Convenience and Necessity (“CCN”) pursuant to section 393.170, RSMo 2016. The CCN would authorize Ameren to construct, own, and operate a wind generation facility to be constructed in Atchison County in Missouri.

2. On October 22, 2018, the Commission issued an *Order Directing Notice, Setting Intervention Deadline, and Scheduling a Procedural Conference* which established an intervention deadline of no later than November 2, 2018.

3. DE is a state agency vested with the powers and duties set forth in § 620.035 RSMo. DE’s interests are different than those of the general public, as illustrated by its statutory authority to: (1) plan for future energy needs and energy resource development; (2) monitor and analyze all federal, state, local and voluntarily disclosed private sector energy research projects and voluntarily disclosed private sector energy related data and

information concerning supply and consumption; (3) develop, promote, administer and monitor energy conservation programs; (4) consult and cooperate with all state and federal governmental agencies, departments, boards and commissions and all other interested agencies and institutions, governmental and nongovernmental, public and private, on matters of energy research and development, management, conservation and distribution; and (5) analyze the potential for increased use of diverse energy sources, energy efficient technologies, and other energy alternatives and make recommendations for the expanded use of such alternate energy sources and technologies.

4. DE expects to develop its positions on specific issues as this case proceeds.

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

WHEREFORE, the Division of Energy respectfully requests that it be allowed to intervene in the above-styled matter.

Respectfully submitted,

/s/ Michael Lanahan

Michael Lanahan, Bar # 67487

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**Attorney for Missouri Department of  
Economic Development – Division of Energy**

## **CERTIFICATE OF SERVICE**

I hereby certify that copies of the foregoing have been served electronically on all counsel of record this 29<sup>th</sup> day of October, 2018.

*/s/ Michael Lanahan*

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Michael Lanahan