

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

In the Matter of the Application of Transource Missouri,)
 LLC for a Certificate of Convenience and Necessity)
 Authorizing it to Own, Operate, and Maintain the)
 Switch Station Necessary for the Interconnection of the) **File No. EA-2016-0190**
 Osborn Wind Energy Center with the Sibley-Nebraska)
 City Electric Transmission Project)

MISSOURI DIVISION OF ENERGY’S
MOTION TO INTERVENE

COMES NOW the Missouri Department of Economic Development –
Division of Energy¹ (“DE”) and, pursuant to Commission Rule 4 CSR 240-2.075,
respectfully requests that the Missouri Public Service Commission (“Commission”) grant
intervention to DE in the above-styled matter. For its Motion to Intervene, DE states as
follows:

1. On July 22, 2016, Transource Missouri, LLC filed an application with the Commission seeking an order declining jurisdiction, or, in the alternative, granting a Certificate of Convenience and Necessity (“CCN”) pursuant to section 393.170, RSMo 2000. The CCN would authorize Transource Missouri to own, operate, and maintain a 345 kilovolt (“kV”) Interconnection Switch Station in DeKalb County, Missouri that will connect the Osborn Wind Energy Center with Transource Missouri’s Sibley-Nebraska City 345 kV electric transmission line project.

¹ On August 28, 2013, Executive Order 13-03 transferred “all authority, powers, duties, functions, records, personnel, property, contracts, budgets, matters pending, and other pertinent vestiges of the Division of Energy from the Missouri Department of Natural Resources to the Missouri Department of Economic Development . . .”

2. On July 22, 2016, the Commission issued its *Order Directing Notice and Setting Intervention Deadline* which set an intervention deadline of August 19, 2016.

3. DE is a state agency vested with the powers and duties set forth in, *inter alia*, §§ 640.150 and 640.676 RSMo.

4. DE's interests are different than those of the general public, as illustrated by its statutory authority to plan for future energy needs and energy resource development; develop, promote, administer and monitor energy conservation programs;² consult and cooperate with all state and federal governmental agencies on matters of energy research and development, management, conservation and distribution; and analyze the potential for increased use of energy alternatives and make recommendations for the expanded use of such alternate energy sources and technologies.³ DE's intervention, moreover, will serve a public interest, as DE will evaluate the filings from a formal state policy and planning perspective consistent with its interests in clean, affordable, abundant energy, and its efficient use.

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

6. Communications, correspondence, orders, and decision in this matter should be addressed to the undersigned with a copy to DEDEnergyCases@ded.mo.gov.

² §§ 640.676 and 640.150.2 RSMo.

³ § 640.150.1 RSMo.

WHEREFORE, the Missouri Department of Economic Development – Division of Energy respectfully requests that it be allowed to intervene in this case.

Respectfully submitted,

/s/ Alexander Antal

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CERTIFICATE OF SERVICE

I hereby certify that copies of the foregoing have been served electronically on all counsel of record this 17th day of August, 2016.

/s/ Alexander Antal

Alexander Antal