

**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 Public Convenience and ) **File No. EA-2019-0021**  
Necessity Authorizing it to Construct a Wind Generation )  
Facility )

## MISSOURI DIVISION OF ENERGY'S STATEMENT OF POSITIONS

COMES NOW the Missouri Department of Economic Development – Division of Energy (“DE”), by and through the undersigned counsel, and for its Statement of Positions in the above-styled matter states:

## LIST OF ISSUES

**1. Should the Commission grant the certificate of convenience and necessity (“CCN”) and merger approval sought by the Company’s application in this docket or reject it?**

The Missouri Public Service Commission (“Commission”) should approve Union Electric Company d/b/a Ameren Missouri’s (“Ameren Missouri” or “Company”) application subject to the conditions specified in the February 11, 2019 *Stipulation and Agreement*. The proposed project would bring economic development benefits to the Atchison County, Missouri area. Additionally, Ameren Missouri’s proposal would create long-term benefits by improving the diversity and security of Missouri’s energy supply. Approval of the project would support Missouri’s ability to compete in retaining, attracting, and supporting the expansion of businesses, including those with specific renewable energy goals, and would be consistent with recent Commission orders on renewable energy projects.

**2. If the Commission approves the CCN and merger approval sought by the Company's application in this docket, what conditions, if any, should the Commission impose?**

The Commission should approve Ameren Missouri's application subject to the conditions specified in the February 11, 2019 *Stipulation and Agreement*.

WHEREFORE, the Missouri Division of Energy respectfully files its *Statement of Positions*.

Respectfully submitted,

/s/ Rochelle L. Reeves

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**Attorney for Missouri Department 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 13<sup>th</sup> day of February, 2019.

/s/ Rochelle L. Reeves

Rochelle L. Reeves