

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

In the Matter of the Second Prudence Review)	
of Union Electric Company d/b/a/ Ameren)	
Missouri's Implementation of Energy)	<u>File No. EO-2017-0023</u>
Efficiency Programs in Furtherance of the)	
Missouri Energy Efficiency Investment Act (MEEIA))	

MISSOURI DIVISION OF ENERGY
APPLICATION TO INTERVENE

COMES NOW the Missouri Department of Economic Development –
Division of Energy¹ (“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 July 25, 2016 the Staff of the Missouri Public Service Commission
 (“Staff”) filed its *Notice of Start of Second MEEIA Prudence Audit* of Union Electric
Company d/b/a Ameren Missouri’s (“Ameren”) Demand Side Investment Mechanism
 (“DSIM”) for the period July 1, 2014 through December 31, 2015. Staff is reviewing the
prudence of costs incurred by Ameren as part of its demand-side programs and
investment mechanisms, originally approved by the Commission in File No. EO-2012-
0142. DE was a party to that case.

¹ The Division of Energy was transferred from the Department of Natural Resources (DNR) to the Department of
Economic Development (DED) on August 29, 2013 by Executive Order 13-03. The Executive Order
transfers “[A]ll 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 August 16, 2016, the Commission issued an *Order Directing Notice of Application, Establishing Intervention Filing Date*. In its Order, the Commission established an intervention deadline of no later than September 12, 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. Communications, correspondence, orders and decision in this matter should be addressed to the undersigned with a copy to DEDEnergyCases@ded.mo.gov.

6. The Division of Energy is uncertain at this time of the position it will take in this case.

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

² §§ 640.676 and 640.150.2 RSMo.

³ § 640.150.1 RSMo.

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 25th day of August, 2016.

/s/ Alexander Antal

Alexander Antal