

BEFORE THE PUBLIC SERVICE COMMISSION
OF THE STATE OF MISSOURI

FILED⁴

DEC 27 2005

Missouri Public
Service Commission

In the Matter of Union Electric
Company's 2005 Utility Resource Filing
Pursuant to 4 CSR 240-Chapter 22.

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Case No. EO-2006-0240

**MISSOURI DEPARTMENT OF NATURAL RESOURCES MOTION TO
INTERVENE**

The Missouri Department of Natural Resources (MDNR), pursuant to 4 CSR 240-2.075, respectfully requests that the Commission grant its application to intervene in the above-styled matter. This application is made for the following reasons:

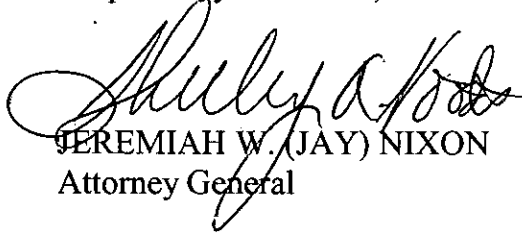
1. On or about December 5, 2005, Union Electric Company (Company) filed its Utility Resource Plan or Integrated Resource Plan as required by 4 CSR 240-2.
2. On or about December 7, 2005, the Commission issued an Order directing notice, setting a date for submission of intervention requests and scheduling a pre-hearing conference. The December 7, 2005, Order establishes December 28, 2005, as the date by which all applications to intervene in the above-styled case are to be filed.
3. MDNR, and specifically its Energy Center, is a state agency vested with the powers and duties set forth in Section 640.150, RSMo.

4. MDNR has an interest different than that of the general public, and its intervention will serve a public interest in that the Energy Center will be looking at the proposed filing from a formal policy and planning perspective as well as looking at the potential impacts on environmental quality. In particular, the Energy Center will look at the proposed filing to assess the commitment by the Company to provide low or no cost weatherization to low income families and energy efficiency programs. The Energy Center's review also will be in relation to the mandate set forth in Section 640.150, RSMo. The mandate set forth in the statute includes planning for energy resource development; analyzing energy management issues; consulting and cooperating with all state and federal governmental agencies on matters of energy research and development, management, conservation and distribution; assessing the potential impacts on environmental quality; and analyzing the potential for increased use of energy alternatives and making recommendations for the expanded use of such alternate energy sources and technologies.

5. The Energy Center takes no position on the filing as filed, but would welcome the opportunity to work with the Company, Staff and the Office of Public Counsel to explore developing a program that has meaningful benefits to consumers and the environment.

WHEREFORE, the Missouri Department of Natural Resources respectfully requests that it be allowed to intervene in the above-styled matter.

Respectfully submitted,



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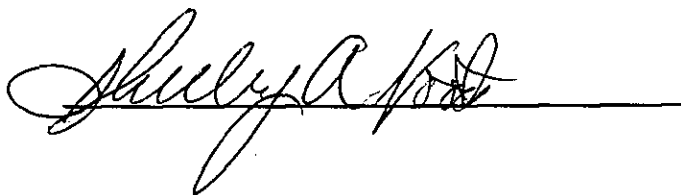
Certificate of Service

I hereby certify that copies of the foregoing have been mailed, hand-delivered, transmitted by facsimile or emailed to all counsel of record this 27th day of December, 2005.

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A handwritten signature in cursive script, appearing to read "Shelly A. Post", is written over a horizontal line.