

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

In the Matter of Union Electric Company d/b/a                    )  
Ameren Missouri’s 2<sup>nd</sup> Filing to Implement                    ) **Case No. EO-2015-0055**  
Regulatory Changes in Furtherance of Energy                    )  
Efficiency as Allowed by MEEIA    )

**MISSOURI DIVISION OF ENERGY**  
**MOTION TO INTERVENE**

COMES NOW the Missouri Department of Economic Development –  
Division of Energy<sup>1</sup> (“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, DE states the following:

1. On December 22, 2014, Union Electric Company d/b/a Ameren Missouri  
 (“Ameren Missouri”) filed an Application seeking approval of certain demand-side  
 programs, a Technical Resource Manual (“TRM”), and a Demand-Side Investment  
 Mechanism (“DSIM”) as contemplated by the Missouri Energy Efficiency Investment Act  
 (“MEEIA”) and the Commission’s implementing regulations.

2. On December 22, 2014, the Commission issued an *Order Directing Notice of  
 Application and Establishing Intervention Filing Date* which set an intervention deadline of  
 January 13, 2015.

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<sup>1</sup> Executive Order 13-03 transferred the Division of Energy from the Department of Natural Resources (DNR) to the Department of Economic Development (DED) effective August 29, 2013. The Executive Order 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....”

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;<sup>2</sup> 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.<sup>3</sup> 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.

The DE's review also will be in relation to the requirements set forth in rules 4 CSR 240-3.163, which lists the information that an electric utility must provide when it seeks to establish a DSIM and to seek approval, modification or discontinuance of demand-side programs. The Division of Energy has a strong interest in encouraging energy efficiency through cost-effective demand-side programs and this interest can be significantly furthered through DSIM filings made under these rules.

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 counsel with a copy to [DEDEnergyCases@ded.mo.gov](mailto:DEDEnergyCases@ded.mo.gov).

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<sup>2</sup> §§ 640.676 and 640.150.2 RSMo.

<sup>3</sup> § 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/ Jeremy Knee  
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**Division of Energy**

**CERTIFICATE OF SERVICE**

I hereby certify that copies of the foregoing have been served electronically on all counsel of record this 22<sup>nd</sup> day of December, 2014.

/s/ Jeremy Knee  
Jeremy Knee