

**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)	Case No. EA-2019-0371
Approval and a Certificate of Convenience and)	
Necessity Authorizing it to Construct Solar Generation)	
Facility(ies))	

**APPLICATION TO INTERVENE OF THE MISSOURI
DEPARTMENT OF CONSERVATION**

The Missouri Department of Conservation ("MDC"), pursuant to 20 CSR 4240-2.075 and this Commission's September 3, 2019 *Order Directing Notice and Setting Date for Intervention*, files its application to intervene and become a party in the above-captioned case. For its application, MDC states as follows:

1. MDC is a Missouri state agency created by § 252.020, RSMo, headed by the Missouri Conservation Commission created by Article IV, Section 40 of the Missouri Constitution. MDC's interests include the protection, management, restoration and conservation of Missouri's forest, fish and wildlife resources.
2. MDC's interests are different than that of the general public and may be adversely affected by a final order arising from this case.
3. Pursuant to 20 CSR 4240-2.075(2), MDC states it does not yet have a position on the issues in this case and reserves the right to take positions on specific issues as this case proceeds.
4. MDC's intervention will serve the public interest by assisting the Commission's record for decision in this case.
5. No party will be prejudiced by MDC's intervention.

6. This Application to Intervene is timely under the Commission's September 3, 2019 Order.

7. The Missouri Public Service Commission has previously recognized MDC's interest in proceedings affecting the state's forest, fish and wildlife resources in permitting MDC's intervention in prior proceedings. *See, e.g.,* Case Nos. EA-2018-0202, EA-2019-0010.

8. Correspondence, communications, orders and decisions in this matter should be addressed to the undersigned attorneys.

WHEREFORE, MDC requests that it be permitted to intervene and be made a party to this case for all purposes.

Respectfully submitted,

ELLINGER AND ASSOCIATES, LLC

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MISSOURI DEPARTMENT OF
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CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing was served upon all of the parties of record or their counsel, pursuant to the Service List maintained by the Data Center of the Missouri Public Service Commission, on September 23, 2019.

/s/Stephanie S. Bell
Stephanie S. Bell