

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

In the Matter of Union Electric Company d/b/a)
Ameren Missouri’s 2020 Utility Resource Filing) **File No. EO-2021-0021**
Pursuant to 20 CSR 4240 – Chapter 22)

MISSOURI DIVISION OF ENERGY
APPLICATION TO INTERVENE

COMES NOW the Missouri Department of Natural Resources – Division of Energy (“DE”) and, pursuant to Missouri Public Service Commission (“Commission”) Rule 20 CSR 4240-2.075, respectfully requests that the Commission grant intervention to DE in the above-styled matters. For its Motion to Intervene, DE states as follows:

1. On September 27, 2020, Union Electric Company d/b/a/ Ameren Missouri filed its 2020 Integrated Resource Plan, as required by the Commission’s Electric Utility Resource Planning Rule, 20 CSR 4240-22. The Commission’s deadline to file applications to intervene in this matter is October 30, 2020.

2. DE is a state agency vested with the powers and duties set forth in § 620.035 RSMo. DE’s interests are different than those of the general public, as illustrated by its statutory authority to: (1) plan for future energy needs and energy resource development; (2) monitor and analyze all federal, state, local and voluntarily disclosed private sector energy research projects and voluntarily disclosed private sector energy related data and information concerning supply and consumption; (3) develop, promote, administer and monitor energy conservation programs; (4) consult and cooperate with all state and federal governmental agencies, departments, boards and commissions and all other interested agencies and institutions, governmental and nongovernmental, public and private, on matters of energy research and development,

management, conservation and distribution; and (5) analyze the potential for increased use of diverse energy sources, energy efficient technologies, and other energy alternatives and make recommendations for the expanded use of such alternate energy sources and technologies.

3. DE may develop positions on specific issues as this case proceeds.

4. Communications, correspondence, orders and decision in this matter should be addressed to the undersigned.

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

Respectfully submitted,

/s/ Jacob Westen

Jacob Westen, Bar No. 65265

Deputy General Counsel

Missouri Department of Natural Resources

P.O. Box 176

Jefferson City, MO 65102

573-751-5464

Jacob.Westen@dnr.mo.gov

Attorney for Missouri Division of Energy

CERTIFICATE OF SERVICE

I hereby certify that true and correct copies of the foregoing have been emailed to the certified service list this 30th day of September, 2020.

/s/ Jacob Westen