

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

In the Matter of the First Prudence Review of)
 Union Electric Company d/b/a Ameren Missouri's)
 Implementation of Energy Efficiency Programs in) EO-2015-0029
 Furtherance of the Missouri Energy Efficiency)
 Investment Act (MEEIA)

MISSOURI DIVISION OF ENERGY'S
MOTION TO INTERVENE

COMES NOW the Missouri Department of Economic Development –
Division of Energy¹ (“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 to Intervene, DE states as
follows:

1. On July 28, 2014, the Commission’s Staff filed a notice indicating that it started its prudence audit of the costs subject to Union Electric Company d/b/a Ameren Missouri’s (“Ameren Missouri”) demand-side programs investment mechanism (“DSIM”).

2. On July 30, 2014, the Commission issued its *Order Directing Notice, Establishing an Intervention Deadline, and Setting a Deadline for Requesting a Hearing*, which set an intervention deadline of August 20, 2014.

¹ On August 28, 2013, Executive Order 13-03 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;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. 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:

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with a copy to:

² §§ 640.676 and 640.150.2 RSMo.

³ § 640.150.1 RSMo.

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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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CERTIFICATE OF SERVICE

I hereby certify that copies of the foregoing have been served electronically on all counsel of record this 20th day of August, 2014.

/s/ *Jeremy Knee*
Jeremy Knee