

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

In the Matter of Union Electric Company d/b/a            )  
Ameren Missouri’s Tariffs to Increase                    )  
Its Annual Revenues for Electric Service.                )        **File No. ER-2014-0258**

**PETITION FOR LEAVE TO FILE AMICUS BRIEF**

COMES NOW the Department of Economic Development (DED) and for its Motion to for Leave to File Amicus Brief states as follows:

1.       4 CSR 240-2.075(11) provides:

Any person not a party to a case may petition the commission for leave to file a brief as an amicus curiae. The petition for leave must state the petitioner’s interest in the matter and explain why an amicus brief is desirable and how the matters asserted are relevant to the determination of the case. The brief may be submitted simultaneously with the petition. Unless otherwise ordered by the commission, the brief must be filed no later than the initial briefs of the parties and comply with all applicable briefing requirements.

2.       DED is not a party to this case<sup>1</sup> and has an interest in one of the issues raised in this case. DED’s participation through the filing of an amicus brief will serve the public interest in that DED is the Executive Agency charged with supporting economic development in the state. 4 CSR 240-2.075(11) allows an amicus brief to be filed simultaneously with the petition for leave to file. In its amicus brief, which is filed simultaneously with this petition, DED explains the importance of the Noranda

---

<sup>1</sup> The Division of Energy, one of the divisions within DED, is a party to this case and offered evidence and arguments. DED seeks to file an amicus brief to explain its position as an on the “*Nonunanimous Stipulation and Agreement regarding Economic Development, Class Cost of Service, Revenue Allocation and Rate Design*” filed on March 10, 2015.

operations in Southeast Missouri to the economic development of that region and the state as a whole.

3. 4 CSR 240-2.075(11) also allows the Commission to grant leave for an amicus brief must to filed later than the initial briefs of the parties. The regulation does not offer a standard by which the Commission is to determine whether to allow late filing of an amicus brief. Therefore the standard must be whether the Commission, in its discretion, believes that the filing would advance the public interest. In this instance, it is clear that the public interest would be served by allowing the opinion of the Executive Agency charged with supporting economic development in the state to be heard by the Commission.

WHEREFORE, the Department of Economic Development respectfully requests that the Commission accept its Amicus Brief filed simultaneously herewith.

Respectfully submitted,

*/s/ Ollie Green*

Ollie Green, Bar #64482

Senior Legal Counsel

Missouri Department of Economic Development

P.O. Box 1157

Jefferson City, MO 65102

Ph: 573-526-4806

E: ollie.green@ded.mo.gov

**Attorney for Missouri DED**

**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 7th day of April, 2015.