

**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 Approval)	<u>File No. ET-2016-0246</u>
Of a Tariff Setting a Rate for Electric Vehicle)	Tariff No. YE-2017-0030
Charging Stations)	

**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 August 15, 2016, Union Electric Company d/b/a Ameren Missouri
 (“Ameren Missouri”) filed an application requesting that the Commission approve a tariff
 authorizing a pilot program to install and operate electric vehicle charging stations at
 locations within Ameren Missouri’s service area along the Interstate 70 corridor between
 St. Louis and Boonville, Missouri and in Jefferson City, Missouri. Ameren Missouri also
 filed tariff sheets with an effective date of October 15, 2016, to implement the pilot
 program.

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 . . . ”

2. On August 15, 2016, the Commission issued its *Notice of Tariff Filing and Order Establishing Time to File Recommendations* which set an intervention deadline of August 31, 2016.

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 the undersigned with a copy to DEDEnergyCases@ded.mo.gov

² §§ 640.676 and 640.150.2 RSMo.

³ § 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/ Alexander Antal

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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 31st day of August, 2016.

/s/ Alexander Antal

Alexander Antal