

**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)	<u>File No. EA-2018-0202</u>
Approval and a Certificate of Convenience and)	Tariff No. YE-2018-0158
Necessity Authorizing it to Construct a Wind)	
Generation Facility)	

MISSOURI DIVISION OF ENERGY
APPLICATION TO INTERVENE

COMES NOW the Missouri Department of Economic Development – Division of Energy¹ (“DE”) and, pursuant to Missouri Public Service Commission (“Commission”) Rule 4 CSR 240-2.075, respectfully requests that the Commission grant intervention to DE in the above-styled matter. For its Motion to Intervene, DE states as follows:

1. On May 21, 2018, Union Electric Company d/b/a/ Ameren Missouri (“Ameren Missouri”) filed an application with the Commission seeking an order granting a Certificate of Convenience and Necessity (“CCN”) pursuant to section 393.170, RSMo 2016. The CCN would authorize Ameren Missouri to construct, own, and operate a wind generation facility to be constructed in Schuyler and Adair Counties in Missouri. Ameren Missouri’s application also seeks approval of a Renewable Energy Standard Cost Recovery Mechanism (“RESRAM”), and a waiver of certain Commission rules. Ameren Missouri requests the Commission grant it a CCN no later than December 19, 2018.

¹ The Division of Energy was transferred from the Department of Natural Resources (DNR) to the Department of Economic Development (DED) on August 29, 2013 by Executive Order 13-03. The Executive Order transfers “[A]ll 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 May 21, 2018, the Commission issued an *Order Directing Notice, Setting Intervention Deadline, and Scheduling a Procedural Conference* which established an intervention deadline no later than June 7, 2018.

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

Respectfully submitted,

/s/ Marc Poston

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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 22nd day of May, 2018.

/s/ Marc Poston

Marc Poston