

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

In the Matter of Ameren Missouri's Request for a	)	
Variance from Certain Provisions of 4 CSR 240	)	<b><u>File No. EE-2017-0098</u></b>
Chapter 22 Regarding Electric Utility Resource	)	
Planning	)	

**MISSOURI DIVISION OF ENERGY'S  
MOTION TO INTERVENE**

COMES NOW the Missouri Department of Economic Development –  
Division of Energy<sup>1</sup> (“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 September 30, 2016, Union Electric Company d/b/a Ameren Missouri  
 (“Ameren”) filed with the Commission a request for certain variances from parts of 4  
CSR 240-22 with regard to its next triennial Integrated Resource Plan (“IRP”)  
compliance filing due to be filed on October 1, 2017.

2. On October 5, 2016, the Commission issued its *Order Providing Notice,  
Establishing Intervention Deadline, and Setting Time for Responses* which set an  
intervention deadline of October 24, 2016.

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<sup>1</sup> 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;<sup>2</sup> 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.<sup>3</sup> 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.

WHEREFORE, the Missouri Department of Economic Development – Division of Energy respectfully requests that it be allowed to intervene in this case.

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<sup>2</sup> §§ 640.676 and 640.150.2 RSMo.

<sup>3</sup> § 640.150.1 RSMo.

Respectfully submitted,

/s/ Alexander Antal

Alexander Antal

Associate General Counsel

Missouri Bar No. 65487

Department of Economic Development

P.O. Box 1157

Jefferson City, MO 65102

Phone: 573-522-3304

Fax: 573-526-7700

alexander.antal@ded.mo.gov

**Attorney for Missouri Division of Energy**

**CERTIFICATE OF SERVICE**

I hereby certify that copies of the foregoing have been served electronically on all counsel of record this 11<sup>th</sup> day of October, 2016.

/s/ Alexander Antal

Alexander Antal