

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

In the Matter of Union Electric Company d/b/a) **File No. ET-2016-0152**
Ameren Missouri’s LED Street Lighting Update) Tariff No. YE-2016-0159
And Tariff Filing

MISSOURI DIVISION OF ENERGY
APPLICATION TO INTERVENE

COMES NOW the Missouri Department of Economic Development –
Division of Energy¹ (Division of Energy) and, pursuant to Commission Rule 4 CSR 240-
2.075, respectfully requests that the Commission issue its order granting the Division of
Energy’s Application to Intervene. For its Application, the Division of Energy states as
follows:

1. On December 17, 2015, Union Electric Company d/b/a/ Ameren Missouri
 (“Ameren Missouri”) filed its LED Lighting Update Report in compliance with the
 Nonunanimous Stipulation and Agreement Regarding MEEIA Low Income Exemption
 and LED Streetlight Issues and a revised tariff to reflect a lower monthly rate for LED
 street lights with an effective date of January 16, 2016.

2. On December 17, 2015 the Commission issued a *Notice of Tariff Filing and*
Order Establishing Time to File Recommendations with an intervention deadline no later
 than December 24, 2015.

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...”

3. The Division of Energy is a state agency vested with the powers and duties set forth in Section 640.150, 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 filing from a formal state policy and planning perspective consistent with its interests in clean, affordable, abundant energy, and its efficient use.

5. On December 17, 2015, in support of the proposed tariff, Ameren Missouri submitted its *LED Street and Outdoor Area Lighting Report* which finds that about two-thirds of Company-owned street and outdoor area lights have technically and economically feasible LED alternatives. Ameren Missouri proposes to implement a five year conversion program which, once complete, will result in a reduction of approximately 62,000MWH in energy use and almost 60,000 metric tons of carbon production annually. DE has an interest in the proposed conversion program as it may relate to more efficient use of energy and planning for future energy needs.

² §§ 640.676 and 640.150.2 RSMo.

³ § 640.150.1 RSMo.

6. Communications, correspondence, orders and decisions in this matter should be addressed to the undersigned with a copy to DEDEnergyCases@ded.mo.gov.

7. The Division of Energy is uncertain at this time of the position it will take in this case.

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

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 24th day of December, 2015.

/s/ Alexander Antal

Alexander Antal