

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

In The Matter of Ameren Missouri's	)	
2017 Utility Resource Filing Pursuant to	)	<b><u>File No. EO-2018-0038</u></b>
4 CSR 240 – Chapter 22	)	

**MISSOURI DIVISION OF ENERGY**  
**APPLICATION TO INTERVENE**

COMES NOW the Missouri Department of Economic Development – Division of Energy<sup>1</sup> (“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 September 25, 2017, Union Electric Company d/b/a Ameren Missouri filed its 2017 Integrated Resource Plan (“IRP”), as required by the Commission’s Electric Utility Resource Planning rule, 4 CSR 240-22.
2. On September 25, 2017, the Commission issued an *Order Directing Notice and Setting Deadline for Intervention Requests*. In its Order, the Commission established an intervention deadline of no later than October 16, 2017.
3. DE is a state agency vested with the powers and duties set forth in, *inter alia*, §§ 640.150 and 640.676 RSMo.

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<sup>1</sup> 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...”

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

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

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

<sup>3</sup> § 640.150.1 RSMo.

Respectfully submitted,

/s/ Marc Poston

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**Attorney for Missouri Department of  
Economic Development – Division of  
Energy**

### **CERTIFICATE OF SERVICE**

I hereby certify that copies of the foregoing have been served electronically on all  
counsel of record this 13th day of October, 2017.

/s/ Marc Poston

Marc Poston