

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

In the Matter of a Determination of Special)	
Contemporary Resource Planning Issues to be)	
Addressed by Ameren Missouri in its Next)	<u>File No. EE-2018-0040</u>
Triennial Compliance Filing or Next Annual)	
Update Report)	

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

COMES NOW the Missouri Department of Economic Development –
Division of Energy (“DE”)¹ 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 2, 2017 Union Electric Company d/b/a/ Ameren Missouri filed
with the Commission a *Request for Waivers and Request for Expedited Treatment* related
to 1) Commission rules for filing a 60-day notice prior to filing its pleading and 2)
Integrated Resource Planning rules on Special Contemporary Issues and Annual Updates.
2. On August 3, 2017, the Commission issued its *Notice and Order Directing
Filings* which set an intervention deadline of August 10, 2017.

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”

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 decisions in this matter should be addressed to the undersigned with a copy to DEDEnergyCases@ded.mo.gov

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

² §§ 640.676 and 640.150.2, RSMo.

³ § 640.150.1, RSMo.

Respectfully submitted,

/s/ Brian Bear

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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 10th day of August, 2017.

/s/ Brian Bear

Brian Bear