

**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 Approval of Efficient                )  
Electrification Program                            )  
**File No. ET-2018-0132**

**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 February 22, 2018, Union Electric Company d/b/a/ Ameren Missouri filed an application and accompanying tariff sheets seeking approval of two new tariffed programs that are collectively referred to as the “Charge Ahead” program. The application also seeks approval of modifications to Ameren Missouri’s existing distribution system extension procedures, variances from portions of the Commission’s regulations regarding promotional practices, and the request for an accounting authority order (AAO) for the Charge Ahead program. The proposed tariffs have an April 23, 2018 effective date.

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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...”

2. DE is a state agency vested with the powers and duties set forth in § 640.150 RSMo.

3. 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 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. DE expects to develop its positions on specific issues as this case proceeds.

4. Communications, correspondence, orders and decision in this matter should be addressed to the undersigned with a copy to [DEDEnergyCases@ded.mo.gov](mailto:DEDEnergyCases@ded.mo.gov).

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

Respectfully submitted,

*/s/ Marc Poston*

Marc Poston, MBN #45722

Senior Counsel

Department of Economic Development

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<sup>2</sup> §§ 640.676 and 640.150 RSMo

<sup>3</sup> § 640.150.1 RSMo.

P.O. Box 1157  
Jefferson City, MO 65102  
(573) 751-5558  
[marc.poston@ded.mo.gov](mailto:marc.poston@ded.mo.gov)  
**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 26<sup>th</sup> day of February, 2018.

*/s/ Marc Poston*

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Marc Poston