

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

In the Matter of Ameren Missouri's)	
2017 Utility Resource Filing Pursuant to)	Case No. EO-2018-0038
4 CSR 240 - Chapter 12)	

MOTION TO INTERVENE of WIND ON THE WIRES

COMES NOW Wind on the Wires, by its counsel, and hereby moves the Public Service Commission of the State of Missouri ("PSC" or "Commission") for an order permitting Wind on the Wires to intervene in the above captioned proceeding under 4 CSR 240-2.075 as an interested entity. In support of this motion, Wind on the Wires states and alleges as follows:

1. Wind on the Wires is a not-for-profit corporation organized and existing under the laws of the State of Minnesota. Wind on the Wires is a collaborative organization dedicated to renewable energy's fair access to the electric transmission system and market throughout the Midwest. Wind on the Wires' Board of Directors and members are comprised of wind and solar developers, environmental organizations, wind energy experts, tribal representatives, clean energy advocates, and businesses providing goods and services to the wind industry in Missouri and across the country. Members of Wind on the Wires operate plants in Missouri and also have contracts to provide energy to utilities in Missouri. Wind on the Wires is located at 570 Asbury Street, Suite 201, St. Paul, MN 55104. Notice and mailings may be sent to:

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and

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Midwest Director
American Wind Energy Association
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2. This motion is brought within the deadline to seek intervention established in the Commission's Order Directing Notice, Setting Intervention Deadline issued on September 25, 2017.
3. Wind on the Wires and its members will be directly impacted by the resource plan proposed by Union Electric Company d/b/a Ameren Missouri (Ameren Missouri) in the above-captioned docket because the plan considers the extent to which Ameren Missouri should use wind and solar resources for its customers and the energy policies surrounding those decisions.
4. Wind on the Wires does not yet have a position on the proposals and analysis within the integrated resources plan proposed by Ameren Missouri. Wind on the Wires reserves the right to take positions on specific issues as this case proceeds.
5. No other party or entity interested in this proceeding can adequately represent the interests of Wind on the Wires because our interest differs from that of the general public and other intervenors. Granting Wind on the Wires' intervention will advance the interests of justice and will in no way impair the prompt consideration and resolution of this matter by the Commission.

6. Wind on the Wires' intervention will serve the public interest by assisting the development of a full and complete record for the Commission's decision in this case relative to wind and solar developers positions on the procurement of renewable resources.
7. No party will be prejudiced by Wind on the Wires' intervention.

Wherefore, Wind on the Wires seeks permission to intervene and provide additional information, which will serve the public interest in the referenced case.

Respectfully submitted,

/s/ Deirdre K. Hirner
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Attorney for Wind on the Wires

CERTIFICATE OF SERVICE

The undersigned certifies that this Motion was electronically served upon all parties to this case on October 16, 2017.

/s/ Deirdre K. Hirner
Attorney for Wind on the Wires