

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

In the Matter of Union Electric Company d/b/a ) **File No. ET-2019-0149**  
Ameren Missouri's Revised Tariff Sheets ) **Tariff No. JE-2019-0051**

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

COMES NOW the Missouri Department of Economic Development – Division of Energy (“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, 2018, Union Electric company d/b/a/ Ameren Missouri filed a tariff under Tariff Tracking No. JE-2019-0051 to revise its Rider Missouri Forward and Rider EDRR.

2. The Commission suspended the tariff until March 21, 2019 and issued an *Order Scheduling a Procedural Conference* on December 12, 2018.

3. DE is a state agency vested with the powers and duties set forth in § 620.035 RSMo. DE's interests are different than those of the general public, as illustrated by its statutory authority to: (1) plan for future energy needs and energy resource development; (2) monitor and analyze all federal, state, local and voluntarily disclosed private sector energy research projects and voluntarily disclosed private sector energy related data and information concerning supply and consumption; (3) develop, promote, administer and monitor energy conservation programs; (4) consult and cooperate with all state and federal governmental agencies, departments, boards and commissions and all other interested agencies and institutions, governmental and nongovernmental, public and private, on

matters of energy research and development, management, conservation and distribution; and (5) analyze the potential for increased use of diverse energy sources, energy efficient technologies, and other energy alternatives and make recommendations for the expanded use of such alternate energy sources and technologies.

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

5. Communications, correspondence, orders and decision in this matter should be addressed to the undersigned.

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

Respectfully submitted,

*/s/ Michael Lanahan*

Michael Lanahan, Bar # 67487

Acting General Counsel

Missouri Department of Economic Development

P.O. Box 1157

Jefferson City, MO 65102

573-522-3304

[mlanahan.deenergycases@ded.mo.gov](mailto:mlanahan.deenergycases@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 13<sup>th</sup> day of December, 2018.

*/s/ Michael Lanahan*

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Michael Lanahan