BEFORE THE PUBLIC SERVICE COMMISSION OF THE STATE OF MISSOURI

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In the Matter of an Investigation of Missouri Jurisdictional Generator Self-Commitments into SPP and MISO Day-Ahead Energy Markets

File No. EW-2019-0370

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. 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.

- 2. DE expects to develop its positions on specific issues as this case proceeds.
- 3. Communications, correspondence, orders and decision in this matter should

be addressed to the undersigned counsel.

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

Respectfully submitted,

Is/ Rochelle L. Reeves Rochelle L. Reeves, Bar # 51058 General Counsel Missouri Department of Economic Development P.O. Box 1157 Jefferson City, MO 65102 Phone: 573-526-2423 Email: <u>rreeves.deenergycases@ded.mo.gov</u> 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 15th day of July, 2019.

/s/ Rochelle L. Reeves

Rochelle L. Reeves