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

| In the Matter of Ameren Missouri's Submission | ) |                       |
|---|---|-----------------------|
| of its 2015-2017 RES Compliance Plan and its  | ) | File No. EO-2015-0267 |
| 2014 Compliance Report                        | ) |                       |

## MISSOURI DIVISION OF ENERGY'S APPLICATION TO INTERVENE

COMES NOW the Missouri Department of Economic Development – Division of Energy<sup>1</sup> ("DE") and, pursuant to Commission Rule 4 CSR 240-2.075 and to facilitate access to confidential filings on EFIS, respectfully requests that the Commission issue its order granting DE's Application to Intervene. For its Application, DE states as follows:

1. On April 15, 2015, Union Electric Company d/b/a Ameren Missouri ("Ameren Missouri") filed its 2015-2017 Renewable Energy Standard Compliance Plan and its 2014 Compliance Report, as required by 4 CSR 240-20.100. The Commission opened Case No. EO-2015-0267 and on April 16, 2015 directed that notice be provided and that Staff file a report of its review no later than May 29, 2015. In the same order, the Commission also announced that any interested person may file comments on the Compliance Report and Compliance Plan no later than May 29, 2015.

<sup>&</sup>lt;sup>1</sup> Executive Order 13-03 transferred the Division of Energy from the Department of Natural Resources to the Department of Economic Development on August 29, 2013. The Executive Order 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...."

2. DE is a state agency vested with the powers and duties set forth in § 640.150 RSMo. In addition, § 393.1030.4 RSMo tasks DE with certifying renewable energy resources for purposes of compliance with Missouri's Renewable Energy Standard.

3. DE has an interest different than that of the general public, and its intervention will serve a public interest in that DE will look at the Compliance Report and Plan from a formal policy and planning perspective, with a specific interest in encouraging renewable energy sources.

- 4. DE is uncertain at this time of the specific position it will take in this case.
- 5. Communications, correspondence, orders and decision in this matter should be addressed to the undersigned with a copy to DEDEnergyCases@ded.mo.gov.

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

Respectfully submitted,

/s/ Alexander Antal

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**Attorney for Missouri Division of Energy** 

## **CERTIFICATE OF SERVICE**

I hereby certify that copies of the foregoing have been served electronically on all counsel of record this  $20^{th}$  day of April, 2015.

/s/ Alexander Antal
Alexander Antal