

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

In the Matter of Union Electric d/b/a)	
Ameren Missouri's Change to its 2011)	Case No. EO-2012-0127
Utility Resource Filing pursuant to 4 CSR)	
240 – Chapter 22)	

**MISSOURI DEPARTMENT OF NATURAL RESOURCES'
APPLICATION TO INTERVENE**

COMES NOW Missouri Department of Natural Resources (MDNR) and, pursuant to Commission Rule 4 CSR 240-2.075, respectfully requests that the Commission issue its order granting MDNR's Application to Intervene. For its Application, MDNR states as follows:

1. On October 25, 2011, Union Electric Company d/b/a Ameren Missouri (Ameren) filed a notice of change to its preferred utility resource plan with the Missouri Public Service Commission (PSC). On November 9, 2011, the Commission's Staff (Staff) filed a motion in which it contends that Ameren's notice of changed plan was deficient and urges the Commission to direct Ameren to remedy those deficiencies. The Commission opened Case No. EO-2012-0127 to consider the Staff's request, and on November 10, 2011, issued an Order Directing Notice and Establishing Time To Respond. The Order sets a November 28, 2011 deadline for interested parties to intervene, and a deadline of December 2, 2011 for interested parties to file a response to Staff's Motion.

2. MDNR, and specifically its Division of Energy, is a state agency vested with the powers and duties set forth in Section 640.150, RSMo.

3. MDNR has an interest different than that of the general public, and its intervention will serve a public interest in that the Division of Energy will be looking at the proposed filing from a formal policy and planning perspective as well as looking at the potential impacts on

environmental quality. The Division of Energy's review also will be in relation to the mandate set forth in Section 640.150, RSMo. which includes planning for energy resource development; analyzing energy management issues; consulting and cooperating with all state and federal governmental agencies on matters of energy research and development, management, conservation and distribution; assessing the potential impacts on environmental quality; and analyzing the potential for increased use of energy alternatives and making recommendations for the expanded use of such alternate energy sources and technologies.

4. MDNR has not determined the specific position it will take in this case; however, the Division of Energy has an interest in participating in this matter. MDNR is currently involved in the EO-2011-0271 docket dealing with Ameren's Feb 2011 IRP filing and the Energy Efficiency Stakeholder Process. MDNR has also been involved with other various Ameren planning dockets in the past. As this docket is intricately related to EO-2011-0271, the stakeholder process and other various Ameren planning dockets that MDNR has been active, MDNR has a significant interest in participating in this matter.

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

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WHEREFORE, the Missouri Department of Natural Resources respectfully requests that
it be allowed to intervene in the above-styled matter.

Respectfully submitted,

/s/ Jennifer S. Frazier
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**Attorneys for Missouri Department of Natural
Resources**

CERTIFICATE OF SERVICE

I hereby certify that copies of the foregoing have been mailed, hand-delivered,
transmitted by facsimile or e-mailed to all counsel of record this 28th day of November, 2011.

/s/ Jennifer S. Frazier