

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

In the Matter of the Application of Union)
Electric Company d/b/a Ameren Missouri)
for Permission and Approval and a)
Certificate of Public Convenience and)
Necessity Authorizing it to Construct,) **Case No. EA-2014-0136**
Install, Own, Operate, Maintain and)
Otherwise Control and Manage Solar)
Generation Facilities in O'Fallon,)
Missouri)

MISSOURI DIVISION OF ENERGY
APPLICATION TO INTERVENE

COMES NOW the Missouri Department of Economic Development –
Division of Energy¹ (Division of Energy) and, pursuant to Commission Rule 4
CSR 240-2.075, respectfully requests that the Commission issue its order
granting the Division of Energy's Application to Intervene. For its Application,
the Division of Energy states as follows:

1. On January 13, 2014, pursuant to 4 CSR 240-2.060, 4 CSR 240-
3.105, and § 393.170 RSMo, Union Electric Company, d/b/a/ Ameren Missouri
(Ameren) applied to the Missouri Public Service Commission (Commission) for
a certificate of convenience and necessity to build solar generation facilities in
O'Fallon, Missouri. On January 14, 2014, the Commission issued an **Order**

¹ The Division of Energy was transferred from the Department of Natural Resources (DNR) to the Department of Economic Development (DED) on August 29, 2013 by Executive Order 13-03. The Executive Order transfers "[A]ll 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..."

and Notice of Application. In its January 14, 2014 Order, the Commission established an intervention deadline of no later than February 3, 2014.

2. The Division of Energy is a state agency vested with the powers and duties set forth in § 640.150 RSMo.

3. The Division of Energy 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. The Division of Energy has a specific interest in renewable energy generation resources in regard to the implementation of the Renewable Energy Standard.

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

Jeremy D. Knee
Assistant Attorney General
Attorney General's Office
P.O. Box 899
Jefferson City, MO 65102
Phone: 573-751-8795
Fax: 573-751-8796
Email: Jeremy.Knee@ago.mo.gov

with a copy to:

Mary Ann Young
Division of Energy
Missouri Department of Economic Development
P.O. Box 1766
Jefferson City MO 65102
Phone: 573-751-3335
Fax: 573-526-7553
Email: DEDEnergyCases@ded.mo.gov

5. The Division of Energy is uncertain at this time of the position it will take in this case.

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

Respectfully submitted,

CHRIS KOSTER
Attorney General

/s/ Jeremy D. Knee
Jeremy D. Knee, Bar No. 64644
Assistant Attorney General
Agriculture & Environment Division
Missouri Attorney General's Office
P.O. Box 899
Jefferson City, Missouri 65102
Phone: 573-751-8795
Fax: 573-751-8796
Email: jeremy.knee@ago.mo.gov
**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 31st day of January, 2014.

/s/ *Jeremy D. Knee*
Jeremy D. Knee
Assistant Attorney General