

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

In the Matter of the Consideration of Adoption )  
of the PURPA Section 111(d)(16) Integrated )  
Resource Planning Standard as Required by ) Case No. EO-2009-0247  
Section 532 of the Energy Independence and )  
Security Act of 2007. )

In the Matter of the Consideration of Adoption )  
of the PURPA Section 111(d)(17) Rate Design )  
Modifications to Promote Energy Efficiency ) Case No. EO-2009-0248  
Investments Standard as Required by Section )  
532 of the Energy Independence and Security )  
Act of 2007. )

In the Matter of the Consideration of Adoption )  
of the PURPA Section 111(d)(16) Consideration )  
of Smart Grid Investments Standard as Required ) Case No. EO-2009-0249  
by Section 1307 of the Energy Independence and )  
Security Act of 2007. )

In the Matter of the Consideration of Adoption )  
of the PURPA Section 111(d)(17) Smart Grid )  
Information Standard as Required by Section ) Case No. EO-2009-0250  
1307 of the Energy Independence and Security )  
Act of 2007. )

**APPLICATION TO INTERVENE OF  
THE MISSOURI INDUSTRIAL ENERGY CONSUMERS**

Comes now the Missouri Industrial Energy Consumers or “MIEC” and, pursuant to 4 C.S.R. 240-2.075 and the Commission’s December 17, 2008 Order in these cases, files its Application to Intervene. For its Application, the MIEC states as follows:

1. The MIEC is a Missouri corporation and is a group of large industrial energy consumers.

2. As a group of large industrial energy consumers, the MIEC's interest in each of these cases is different than that of the general public.

3. The MIEC's intervention will serve the public interest by assisting the record for the Commission's decision in these cases.

WHEREFORE, the MIEC respectfully requests that it be permitted to intervene in each of these cases, and that it be made a party to each of these cases for all purposes.

Respectfully submitted,

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Energy Consumers

#### **CERTIFICATE OF SERVICE**

I do hereby certify that a true and correct copy of the foregoing document has been hand-delivered, transmitted by e-mail or mailed, First Class, postage prepaid, this 15th day of January, 2009, to all parties on the Commission's service list in this case.

/s/ Diana M. Vuylsteke