

**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. )

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

COMES NOW Missouri Department of Natural Resources (MDNR), in response to the Missouri Public Service Commission's (Commission) *Order Establishing Cases, Directing Notice, Establishing a Deadline for Submission of Intervention Requests, Setting a Prehearing Conference and Date for Filing Procedural Scheduled*, dated December 17, 2008, and hereby submits its application to intervene in the above-entitled matter. In support of its application, MDNR states as follows:

1. MDNR, and specifically its Energy Center, is a state agency vested with the powers and duties set forth in Section 640.150, RSMo.
2. MDNR has an interest different than that of the general public, and its intervention will serve a public interest in that the Energy Center 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 Energy Center's review also will be in relation to the mandate set forth in Section 640.150, RSMo. The mandate set forth in the statute 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.

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

Respectfully submitted,

JEREMIAH W. (JAY) NIXON  
Attorney General

/s/ Shelley A. Woods  
SHELLEY A. WOODS  
Assistant Attorney General  
P.O. Box 899  
Jefferson City, Missouri 65102  
Bar No. 33525  
573-751-8795  
573-751-8464 (fax)  
[shelley.woods@ago.mo.gov](mailto:shelley.woods@ago.mo.gov)

#### **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 8th day of January, 2009.

/s/ Shelley A. Woods  
SHELLEY A. WOODS