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

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In re: Ameren Missouri's 2014 Utility Resource Filing Pursuant to 4 CSR 240 – Chapter 22

Case No. EO-2015-0084

## **APPLICATION TO INTERVENE OF COMVERGE, INC.**

Comverge, Inc. ("Comverge"), by and through its attorneys, pursuant to 4 CSR 240-2.075, hereby files its application to intervene. For its application, Comverge states as follows:

1. Comverge is a for-profit corporation with its corporate offices located at 5390 Triangle Parkway, Suite 300, Norcross, GA 20092 with other offices located throughout the United States.

2. Comverge is a long-standing provider of intelligent energy solutions and a recognized leader in providing peak demand response services to electricity consumers through utility programs across the United States.

3. As a provider of unique energy services, Comverge has an interest in the subject matter of this docket and cannot be adequately represented by any other party in this case. Comverge has an interest in the subject matter of this docket different from that of the general public which may be adversely affected by a final order arising from this docket.

4. The Integrated Resource Plan ("IRP") filed by Ameren Missouri includes extensive analysis and proposals regarding when and how demand response programs and new electricity generating supply resources should be implemented by Ameren Missouri.

5. Comverge's intervention will serve the public interest by providing significant expertise in this matter regarding demand response programs and how the adoption of demand

response programs by Ameren Missouri can lower the costs of electricity for Missouri consumers and reduce greenhouse gas emissions.

6. Comverge does not yet have a position on the issues in this case and reserves the right to take positions on specifics as this case proceeds.

7. Comverge accepts the record as it exists, including the requirements of any orders of the Commission, on the date of this application to intervene.

8. Comverge states that there is good cause for the granting of its intervention filed after the intervention date. 4 CSR 240-2.075(10). Comverge needed additional time to review the extensive IRP filed by Ameren Missouri and make a decision on whether to intervene in this case. Moreover, unless this intervention is granted demand response will not be adequately represented in this case because no other demand response provider or trade group has intervened in this case.

9. Pleadings, notices, orders, decisions and other correspondence may be sent to the undersigned legal counsel.

WHEREFORE, Comverge requests that it be permitted to intervene and be made a party to this case for all purposes.

Respectfully submitted,

COMVERGE, INC.

Date: November 17, 2014

By: <u>/s/ Leo Konzen</u>

One of its Attorneys

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## **CERTIFICATE OF SERVICE**

I, Leo Konzen, an attorney, certify that I caused a copy of the foregoing Comverge, Inc. Application to Intervene to be served upon all parties of record by causing same to be filed electronically in the above-captioned case and serving same electronically on November 17, 2014.

/s/ Leo Konzen

Leo Konzen