

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

In the Matter 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, Install, Own) **File No. EA-2015-0273**
Operate, Maintain and Otherwise Control and)
Manage Solar Generation Facilities in)
Montgomery County, 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 June 29, 2015, Union Electric Company d/b/a Ameren Missouri filed an
application with the Missouri Public Service Commission (“Commission”)
requesting a Certificate of Convenience and Necessity (“CCN”) as authorized by 4
CSR 240-2.060, 4 CSR 240-3.105, and Section 393.170 RSMo. The CCN would
authorize Ameren Missouri to construct, install, own, operate, maintain and
otherwise control and manage solar generation facilities in Montgomery County,
Missouri.

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...”

2. On June 30, 2015, the Commission issued an *Order Directing Notice of Contested Case and Setting Intervention Deadline*. In its June 30, 2015 Order, the Commission established an intervention deadline of no later than July 28, 2015.
3. The Division of Energy is a state agency vested with the powers and duties set forth in Section 640.150, RSMo.
4. 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.
5. Communications, correspondence, orders and decision in this matter should be addressed to the undersigned with a copy to DEDEnergyCases@ded.mo.gov.
6. 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,

/s/ Alexander Antal
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CERTIFICATE OF SERVICE

I hereby certify that copies of the foregoing have been served electronically on all counsel of record this 24th day of July, 2015.

/s/ Alexander Antal
Alexander Antal