

**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) **File No. EA-2016-0208**
Authorizing it to Offer a Pilot Distributed Solar)
Program and File Associated Tariff)

MISSOURI DIVISION OF ENERGY
APPLICATION TO INTERVENE

COMES NOW the Missouri Department of Economic Development –
Division of Energy¹ (“DE”) and, pursuant to Missouri Public Service Commission
 (“Commission”) Rule 4 CSR 240-2.075, respectfully requests that the Commission grant
intervention to DE in the above-styled matter. For its Motion to Intervene, DE states as
follows:

1. On April 27, 2016, Union Electric Company d/b/a Ameren Missouri
 (“Ameren Missouri”) filed an application with the Commission for a certificate of
convenience and necessity authorizing it to construct, install, own, operate, maintain and
otherwise control and manage various small solar generation facilities at different
locations within its service territory as part of a pilot program.

2. On April 28, 2016, the Commission issued an *Order Directing Notice, Setting
Intervention Deadline, and Directing Filing of Staff Recommendation*. In its Order, the
Commission established an intervention deadline of no later than May 20, 2016.

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...”

3. DE is a state agency vested with the powers and duties set forth in, *inter alia*, §§ 640.150 and 640.676 RSMo.

4. DE's interests are different than those of the general public, as illustrated by its statutory authority to plan for future energy needs and energy resource development; develop, promote, administer and monitor energy conservation programs;² consult and cooperate with all state and federal governmental agencies on matters of energy research and development, management, conservation and distribution; and analyze the potential for increased use of energy alternatives and make recommendations for the expanded use of such alternate energy sources and technologies.³ DE's intervention, moreover, will serve a public interest, as DE will evaluate the filings from a formal state policy and planning perspective consistent with its interests in clean, affordable, abundant energy, and its efficient use.

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.

² §§ 640.676 and 640.150.2 RSMo.

³ § 640.150.1 RSMo.

Respectfully submitted,

/s/ Alexander Antal

Alexander Antal
Associate General Counsel
Missouri Bar No. 65487
Department of Economic Development
P.O. Box 1157
Jefferson City, MO 65102
Phone: 573-522-3304
Fax: 573-526-7700
alexander.antal@ded.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 3rd day of May, 2016.

/s/ Alexander Antal

Alexander Antal