

**STATE OF MISSOURI**  
**PUBLIC SERVICE COMMISSION**

**FILED<sup>4</sup>**

JUL 24 2006

In the Matter of the Consideration of Adoption )  
of the PURPA Section 111(d)(15) )  
Interconnection Standard as Required by )  
Section 1251 of the Energy Policy Act of 2005 )

Missouri Public  
Service Commission

Case No. EO-2006-0497

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

The Missouri Department of Natural Resources (MDNR), pursuant to 4 CSR 240-2.075, respectfully requests that the Commission grant its application to intervene in the above-styled matter. This application is made for the following reasons:

1. June 22, 2006, the Commission's Staff filed a motion requesting that the Commission establish a case, provide notice, set an intervention deadline and schedule an early prehearing conference for the purpose of establishing a record of consideration and a determination as to whether to adopt the Interconnection Standard established in section 1251 of the Energy Policy Act of 2005.
2. On June 23, 2006, the Commission issued its Order Directing Notice, Establishing Time For Filing Recommendations, Setting Date for Submission of Intervention Requests and Setting Date for Filing A Procedural Schedule.
3. The Commission's June 23, 2006, Order establishes July 24, 2006, as the date by which all interested parties must apply to intervene in the above-styled case.


4. MDNR, and specifically its Energy Center, is a state agency vested with the powers and duties set forth in Section 640.150, RSMo.

4. 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 Interconnection Standard 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 conducted pursuant to its 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

  
SHELLEY A. WOODS

Assistant Attorney General

MBE #33525

P. O. Box 899

Jefferson City, MO 65102

Telephone (573) 751-8795

TELEFAX No. (573) 751-8464

[shelley.woods@ago.mo.gov](mailto:shelley.woods@ago.mo.gov)

Attorneys for Missouri Department of Natural  
Resources

### CERTIFICATE OF SERVICE

The undersigned hereby certifies that the foregoing was served by mailing a copy thereof, via U.S. Mail, this 24<sup>th</sup> day of July, 2006, to:

Steve Dottheim  
Chief Deputy General Counsel  
Missouri Public Service Commission  
P.O. Box 360  
Jefferson City, Missouri 65102

Dennis Frey  
Senior Counsel  
Missouri Public Service Commission  
P.O. Box 360  
Jefferson City, Missouri 65102

Lewis Mills, Public Counsel  
Office of the Public Counsel  
P.O. Box 2230  
Jefferson City, Missouri 65102



Shelley A. Woods  
Assistant Attorney General