

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

In the Matter of the Application of)
Ameren Transmission Company of)
Illinois for Authority to Acquire Electric)
Transmission Facilities from Rolla)
Municipal Utilities and for a Certificate)
of Public Convenience and Necessity)
to Own, Operate, Maintain, and)
Otherwise Control and Manage those)
Facilities.

Case No. EA-2018-0327

MISSOURI DIVISION OF ENERGY
APPLICATION TO INTERVENE

COMES NOW the Missouri Department of Economic Development – Division of Energy (“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 August 23, 2018, Ameren Transmission Company of Illinois (“ATXI”) applied to the Commission for a Certificate of Convenience and Necessity (CNN) and any other approvals necessary to authorize ATXI to acquire certain electrical facilities owned by the City of Rolla, Missouri, and to own, operate, maintain, and control those facilities as well as adjacent facilities ATXI plans to construct as a part of a proposed network transmission solution. ATXI also requested expedited treatment of its application and requests Commission approval of its application by February 1, 2019.

2. On August 24, 2018, the Commission issued an *Order and Notice* which established an intervention deadline of no later than September 10, 2018.

3. DE is a state agency vested with the powers and duties set forth in § 620.035 RSMo. DE’s interests are different than those of the general public, as illustrated by its

statutory authority to: (1) plan for future energy needs and energy resource development; (2) monitor and analyze all federal, state, local and voluntarily disclosed private sector energy research projects and voluntarily disclosed private sector energy related data and information concerning supply and consumption; (3) develop, promote, administer and monitor energy conservation programs; (4) consult and cooperate with all state and federal governmental agencies, departments, boards and commissions and all other interested agencies and institutions, governmental and nongovernmental, public and private, on matters of energy research and development, management, conservation and distribution; and (5) analyze the potential for increased use of diverse energy sources, energy efficient technologies, and other energy alternatives and make recommendations for the expanded use of such alternate energy sources and technologies.

4. DE expects to develop its positions on specific issues as this case proceeds.

5. Communications, correspondence, orders and decision in this matter should be addressed to the undersigned with a copy to DEDEnergyCases@ded.mo.gov.

WHEREFORE, the Division of Energy respectfully requests that it be allowed to intervene in the above-styled matter.

Respectfully submitted,

/s/ Marc Poston

Marc Poston, MBN #45722

Senior Counsel

Department of Economic Development

P.O. Box 1157

Jefferson City, MO 65102

(573) 751-5558

marc.poston@ded.mo.gov

**Attorney for Missouri Department of
Economic Development – Division of
Energy**

CERTIFICATE OF SERVICE

I hereby certify that copies of the foregoing have been served electronically on all counsel of record this 31st day of August, 2018.

/s/ Marc Poston

Marc Poston