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

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In re: Union Electric Company's 2014 Utility Resource Filing Pursuant to 4 CSR 240 – Chapter 22

File No. EO-2015-0084

## MISSOURI DIVISION OF ENERGY'S MOTION TO INTERVENE

COMES NOW the Missouri Department of Economic Development -

Division of Energy<sup>1</sup> ("DE") and, pursuant to Commission Rule 4 CSR 240-2.075 and to facilitate access to Highly Confidential filings on EFIS, respectfully requests that the Missouri Public Service Commission ("Commission") grant intervention to DE in the above-styled matter. In support of its motion, DE states as follows:

1. On October 1, 2014, Union Electric Company, d/b/a Ameren Missouri,

filed with the Commission its 2014 Integrated Resource Plan (IRP).

2. On October 1, 2014, the Commission issued its *Order Directing Notice and Setting Date for Submission of Intervention Requests*, which set an intervention deadline of October 21, 2014.

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

<sup>&</sup>lt;sup>1</sup> Effective August 28, 2013, Executive Order 13-03 transferred "all 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 . . . "

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;<sup>2</sup> 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.<sup>3</sup> 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. DE expects to develop its positions on specific issues as this case proceeds.

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

<sup>&</sup>lt;sup>2</sup> §§ 640.676 and 640.150.2 RSMo. <sup>3</sup> § 640.150.1 RSMo.

WHEREFORE, the Missouri Department of Economic Development - Division of

Energy respectfully requests that it be allowed to intervene in this case.

Respectfully submitted,

/s/ Jeremy Knee JEREMY D. KNEE Missouri Bar No. 64644 Associate General Counsel Missouri Department of Economic Development P.O. Box 1157 Jefferson City, Missouri 65102 Phone: 573-522-3304 Fax: 573-526-7700 Attorney for Missouri DED Division of Energy

## **CERTIFICATE OF SERVICE**

I hereby certify that copies of the foregoing have been served electronically on all

counsel of record this 8th day of October, 2014.

/s/ Jeremy Knee