

BEFORE THE PUBLIC SERVICE COMMISSION
OF THE STATE OF MISSOURI

In the Matter of Union Electric Company d/b/a)
AmerenUE’s Tariffs to Increase its Annual)
Revenues for Electric Service) Case No. ER-2016-0179

MOTION TO INTERVENE OF NRDC

Comes now the Natural Resources Defense Council (“NRDC”), and pursuant to 4 CSR 240-2.075, applies to intervene herein. In support of its motion to intervene, NRDC states the following.

1. NRDC is a nonprofit corporation organized under the laws of New York with a Midwest office at 20 North Wacker Drive, Suite 1600, Chicago, IL 60606; contact Ashok Gupta at that address or at 212-243-4351. It has over 4,800 members in Missouri, many of whom are Ameren ratepayers. NRDC and its members are interested in promoting energy efficiency, peak demand reduction and renewable energy resources to meet Missouri’s energy needs. NRDC seeks to intervene in this proceeding in order that its members and others may benefit from well designed and cost-effective energy efficiency programs. Specifically, NRDC is interested in rate design issues and in ensuring that Ameren’s rate designs advance its customers’ and NRDC’s interests in demand-side programs and renewable energy. NRDC will bring significant expertise to this proceeding. The Staff of NRDC has extensive history with the design and implementation of utility programs and policies designed to deploy energy efficiency and peak demand reduction to benefit the public. NRDC has intervened and/or provided testimony on these issues in public utility commission proceedings in many states,

including Missouri, Illinois, Michigan, Ohio, Wisconsin, New York, Oregon, Iowa, New Jersey and California. NRDC has regularly presented testimony before the US Congress and various state legislatures related to the electric utility industry's use of energy efficiency resources, rate design, utility planning and other topics relevant to this proceeding.

2. Correspondence, communications, orders and decisions may be sent to:

Henry B. Robertson (Mo. Bar No. 29502)
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(314) 231-4181
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3. NRDC has been a party in other Commission dockets involving Ameren, including ER-2014-0258; its MEEIA dockets going back to the first, EO-2012-0142; and its Chapter 22 dockets going back to EE-2010-0243.

4. Movant's interests are different from those of the general public and could be adversely affected by the Commission's order in this case.

5. Movant is not yet certain of the position it will take in this case.

6. For the foregoing reasons, it will serve the public interest for the PSC to grant this application to intervene.

WHEREFORE, the Natural Resources Defense Council respectfully requests the Public Service Commission to grant the application to intervene.

/s/ Henry B. Robertson
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Attorney for applicant

CERTIFICATE OF SERVICE

I hereby certify that a true and correct PDF version of the foregoing was filed on EFIS and sent by email on this 25th day of July, 2016, to all counsel of record:

/s/ Henry B. Robertson
Henry B. Robertson