

**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 a Certificate)	
of Convenience and Necessity for a Solar Facility,)	File No. EA-2022-0245
Approval of a Subscription-Based Renewable)	
Energy Program, and Authorization to Establish)	
Tracking Mechanism)	

SIERRA CLUB’S MOTION TO INTERVENE

Sierra Club, pursuant to 20 CSR 4240-2.075, moves to intervene in this docket. In support of its motion to intervene, Sierra Club states:

1. Sierra Club is a nonprofit organization organized and existing under the nonprofit corporation laws of the state of California. Sierra Club has more than 800,000 members nationally and more than 12,000 members in Missouri, many of whom reside in Ameren Missouri’s service territory and are Ameren Missouri ratepayers.

2. All communications and pleadings in this case should be directed to:

Bruce A. Morrison
Great Rivers Environmental Law Center
319 North Fourth Street, Suite 800
Saint Louis, MO 63102
(314) 231-4181
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3. Sierra Club exists for the purpose of preserving and protecting environmental values. Consistent with this mission, Sierra Club for many years has advocated for transitioning the electricity sector from coal- and gas-burning generation to cleaner and lower cost forms of energy, such as energy efficiency, renewable energy sources, and energy storage. Sierra Club’s interest in protecting and enhancing the

quality of ambient air and water throughout the state will be favorably affected if Ameren Missouri aggressively pursues renewable energy, energy efficiency, and demand response programs that displace fossil fuel generation. Sierra Club is concerned with emissions of greenhouse gases that cause climate change, and with pollution from coal and gas that cause a host of health problems including asthma, mercury poisoning, sudden infant death syndrome, respiratory problems, and other problems.

4. Sierra Club has previously been a party to several Ameren Missouri triennial IRP and IRP update proceedings, as well as general electric rate cases, energy efficiency proceedings, and other regulatory dockets.

5. Sierra Club's interest in promoting cleaner and lower-cost forms of energy is different from that of the general public and could be adversely affected by unreasonable resource planning decisions that prolong reliance on aging coal-burning plants, that support inadequate levels of DSM programs, and that discourage renewable generation. Sierra Club's intervention would serve the public interest in promoting prudent resource planning, public health, and the reduction of greenhouse gas emissions.

6. Sierra Club has not yet determined the positions it will take in this matter.

7. It will serve the public interest for the PSC to grant this motion to intervene.

WHEREFORE, Sierra Club respectfully requests the Public Service Commission to grant this motion to intervene.

/s/ Bruce A. Morrison
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Attorney for Sierra Club

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing was filed on EFIS and sent by email, on this 15th day of August, 2022, to all counsel of record.

/s/ Bruce A. Morrison
Bruce A. Morrison