

BEFORE THE PUBLIC SERVICE COMMISSION
OF THE STATE OF MISSOURI

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|-------------------------------------|---|-----------------------|
| In re: Ameren Missouri's 2018 |) | |
| Utility Resource Filing Pursuant to |) | Case No. EO-2018-0038 |
| 4 CSR 240 – Chapter 22 |) | |

**APPLICATION TO INTERVENE OF MISSOURI COALITION FOR THE
ENVIRONMENT**

Comes now the Missouri Coalition for the Environment (MCE) and, pursuant to 4 CSR 240-2.075, applies to intervene herein and become a party for all purposes in respect to Ameren Missouri's 2017 triennial IRP filing.

1. MCE is a nonprofit corporation organized under the laws of Missouri with approximately 750 members. MCE has an office at 3115 S. Grand Ave., Suite 650, St. Louis, MO 63118; contact Ed Smith at 314-727-0060, esmith@moenviron.org. MCE and many of its members are Ameren ratepayers. In addition, the Coalition and its members have a strong interest in protecting Missouri's environment, including advocating for the reduction of air pollution from electric utilities, ensuring that nuclear plants do not contaminate the environment, avoiding damage to water quality and the environment from hydroelectric or pumped storage facilities, and advocating for cost-effective energy efficiency and renewable energy resources.

2. MCE was a party to Ameren's IRP cases EO-2006-0240, EO-2007-0409 and EE-2010-0243.

3. At this point MCE does not know what position it will take on the issues in this case.

4. Correspondence, communications, orders and decisions may be sent to the undersigned legal counsel.

5. MCE has environmental interests different from those of the general public or average ratepayer, which could be adversely affected by the decision in this case.

6. It will serve the public interest for MCE to be allowed to intervene.

WHEREFORE, MCE respectfully requests the Public Service Commission to grant this application to intervene.

/s/ Henry B. Robertson
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Attorney for MCE

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 16th day of October, 2017, to all counsel of record.

/s/Henry B. Robertson
Henry B. Robertson