

BEFORE THE PUBLIC SERVICE COMMISSION
OF THE STATE OF MISSOURI

In Re: Union Electric Company's 2008)	
Utility Resource Filing Pursuant to)	Case No. EE-2010-0243
4 CSR 240—Chapter 22)	

**APPLICATION TO INTERVENE OF SIERRA CLUB,
MISSOURI COALITION FOR THE ENVIRONMENT, NRDC AND
MID-MISSOURI PEACEWORKS**

Come now Sierra Club, Missouri Coalition for the Environment (“Coalition”), the Natural Resources Defense Council (“NRDC”), and Missouri Nuclear Weapons Education Fund, operating as Mid-Missouri Peaceworks (“Peaceworks”), and pursuant to 4 CSR 240-2.075, apply to intervene herein and become parties for all purposes in respect to AmerenUE’s (“UE”) 2008 Resource Filing Pursuant to 4 CSR 240—Chapter 22. In support of their motion to intervene, Sierra Club, Coalition, NRDC and Peaceworks state the following.

1. Sierra Club, Coalition and Peaceworks have been parties and stakeholders in AmerenUE’s IRPs since early 2006. NRDC has been a stakeholder by agreement with AmerenUE since January, 2010.

2. Sierra Club is a nonprofit organization organized and existing under the nonprofit corporation laws of the state of California. Sierra Club has more than 700,000 members nationally, and about 3,800 members who reside in St. Louis City and County, St. Charles County and other parts of AmerenUE’s service territory and are UE ratepayers. The Missouri Chapter of the Club has an office at 7164 Manchester, St. Louis, MO 63143; email Missouri.chapter@sierraclub.org; telephone 314-644-0890.

Sierra Club exists for the purposes of preserving and protecting environmental values, and for years has been actively concerned with protecting air and water quality throughout the state of Missouri. Sierra Club's interest in protecting and enhancing the quality of ambient air and water throughout the state will be adversely affected if AmerenUE builds any new power plants from non-renewable polluting sources such as coal or natural gas. Sierra Club is concerned with the build-up of greenhouse gases which lead to global warming, and with pollution from non-renewable sources which cause a host of health problems including asthma, mercury poisoning, sudden infant death syndrome, respiratory problems, and other problems. Sierra Club has been actively encouraging the use of energy efficiencies and renewable energy sources.

3. Missouri Coalition for the Environment is a nonprofit corporation with approximately 750 members. Its office is at 6267 Delmar Blvd., Suite 2E, St. Louis, MO 63130; email klogansmith@moenviron.org; telephone 314-727-0600; fax 314-727-1665. The Coalition and many of its members are AmerenUE 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 other generating facilities to have as low an environmental impact as possible. The Coalition also supports aggressive implementation of cost-effective utility DSM programs

4. NRDC is a nonprofit corporation organized under the laws of New York with a Midwest office at 2 North Riverside Plaza, Suite 2250, Chicago, IL 60606; contact

Rebecca Stanfield at that address or at 312-651-7910. It has 6,179 members in Missouri as of this date, many of whom are AmerenUE 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 and renewable resources. 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 Illinois, 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.

5. The Missouri Nuclear Weapons Education Fund, operating as Mid-Missouri Peaceworks, is a Missouri nonprofit corporation, located at 804C E. Broadway, Columbia, Missouri, 65201. Its telephone number is 573-875-0539; email mail@mosafeenergy.org. It has approximately 500 members. Peaceworks is deeply concerned with the creation of a sustainable future. It has worked for many years to educate the public on the need to make our economy as energy efficient as possible, so as to reduce environmental pollution, reverse the degradation of air and water quality, address the very pressing issue of global climate change, and assure a supply of energy

from renewable sources to meet the needs of our progeny. Peaceworks has strong concerns over nuclear weapons and their proliferation, and is therefore an advocate of a non-nuclear weapons future. As nuclear power and nuclear weapons are inexorably tied to each other, this makes any expansion of nuclear power generation a concern of Peaceworks in terms of its proliferation impact. Many of Peaceworks' members are ratepayers of AmerenUE and therefore have an economic interest in the company pursuing the most cost-effective long-run strategy for meeting energy needs.

6. All the applicants herein intend to advocate for strong DSM programs and the fullest possible implementation of the Renewable Energy Standard. Other than that, applicants do not yet know what specific positions they will take in this proceeding. These interests are different from those of the general public and could be adversely affected by an order approving the 2011 IRP.

7. This application is timely filed in that it meets the Commission's Order requiring such applications be filed by March 21, 2010.

8. It will serve the public interest for the PSC to grant this application to intervene.

WHEREFORE, Sierra Club, Missouri Coalition for the Environment, Natural Resources Defense Council and Peaceworks respectfully request the Public Service Commission to grant the application to intervene.

/s/Henry B. Robertson

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CERTIFICATE OF SERVICE

I hereby certify that a true and correct PDF version of the foregoing was filed on EFIS and sent by first class mail and email on this 19th day of March, 2010, to the following:

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