

BEFORE THE PUBLIC SERVICE COMMISSION  
OF THE STATE OF MISSOURI

In the Matter of the Empire District Electric	)	
Company's Application for Approval of Demand-	)	
Side Programs and for Authority to Establish a	)	File No. EO-2014-0030
Demand-Side Management Investment Mechanism	)	

**MOTION TO INTERVENE OF SIERRA CLUB**

Comes now the Sierra Club, and pursuant to 4 CSR 240-2.075, applies to intervene herein.

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 700,000 members nationally and approximately 8,500 members in Missouri, some of whom reside in Empire's service territory and are Empire ratepayers. The Missouri Chapter of the Club has an office at 7164 Manchester, St. Louis, MO 63143; email [john.hickey@sierraclub.org](mailto:john.hickey@sierraclub.org); telephone 314-644-1011. 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 favorably affected if Empire aggressively pursues energy efficiency and demand response programs and renewable energy initiatives that displace fossil fuel generation. 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 efficiency and renewable energy sources.

2. The Sierra Club's interests focus on environmental protection and hence are different from those of the general public and could be adversely affected by an order approving inadequate levels of DSM programs or continued utilization of excess coal-based generating capacity.

3. The Sierra Club has a longstanding interest in the subject matter of this docket. The Club is a signatory to the stipulations and agreements reached with Ameren Missouri and KCPL-Greater Missouri Operations over their MEEIA plans in Cases EO-2012-0142 and EO-2012-0009 respectively. The Club would like to see that demand-side programs are pursued as aggressively and cost-effectively as possible by all the state's investor-owned utilities.

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

5. It will serve the public interest for the Commission to grant this application to intervene.

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

/s/ Henry B. Robertson  
Henry B. Robertson (Mo. Bar No. 29502)  
Great Rivers Environmental Law Center  
705 Olive Street, Suite 614  
St. Louis, Missouri 63101  
Phone: (314) 231-4181  
Fax: (314) 231-4184  
[hrobertson@greatriverslaw.org](mailto:hrobertson@greatriverslaw.org)  
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 19th day of November, 2013, to all counsel of record:

/s/ Henry B. Robertson