

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) Case No. ER-2010-0036
Revenues for Electric Service)

**APPLICATION TO INTERVENE OF NATURAL RESOURCES DEFENSE
COUNCIL**

Comes now the Natural Resources Defense Council (NRDC) and, pursuant to 4 CSR 240-2.075, applies to intervene herein and become a party for all purposes in respect to AmerenUE's 2009 rate case. In support of its motion, NRDC states as follows.

1. 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. 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.

2. NRDC expects issues to arise in this case concerning demand side management and renewable energy, including the implementation of SB376, the Missouri Residential and Small Business Energy Efficiency Investment Act, § 393.1124, RSMo 2009, and the Renewable Energy Standard. At this point NRDC does not know what position it will take on the issues in this case.

3. 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.

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

5. NRDC has 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 NRDC to be allowed to intervene.

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

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CERTIFICATE OF SERVICE

I hereby certify that a true and correct PDF version of the foregoing was sent by email on this 17th day of August, 2009, to the following parties of record.

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