## BEFORE THE PUBLIC SERVICE COMMISSION OF THE STATE OF MISSOURI

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In the Matter of Union Electric Company d/b/a Ameren Missouri's 2020 Utility Resource Filing Pursuant to 20 CSR 4240 – Chapter 22

Case No. EO-2021-0021

## <u>APPLICATION TO INTERVENE OF</u> <u>DUTCHTOWN SOUTH COMMUNITY CORPORATION</u>

Dutchtown South Community Corporation ("DSCC"), pursuant to 20 CSR 4240-2.075, applies to intervene in this proceeding and become a party for all purposes. In support of its application, DSCC states:

 DSCC is a nonprofit corporation organized under the laws of the State of Missouri. The organization's offices are located at 4204 Virginia Avenue, St. Louis, Missouri 63111.

2. Communications, orders and decisions in this matter should be directed to the undersigned counsel at the mailing address, telephone number and email listed below.

3. DSCC works to stabilize and improve the neighborhoods of Dutchtown, Mt. Pleasant, Marine Villa and Gravois Park in southeast St. Louis City. The organization seeks to advance neighborhood vitality in these neighborhoods through community empowerment, housing stabilization and real estate development. Its Community Empowerment Committee is made up of nearly 90 stakeholders who live, work, own property or own businesses in these communities.

4. DSCC has a particular interest in combatting environmental racism and addressing the disparate impact coal-fired power generation has on persons of color generally and its constituents specifically. The organization is also interested in transitioning the electricity sector from coal-fired generation to cleaner and lower cost forms of energy for its constituents. DSCC seeks to spur investment in programs that will generate job opportunities for its constituents. DSCC seeks to increase the access its constituents have to renewable power opportunities such as community solar. In this way, DSCC has interests that are different from those of the general public or the average ratepayer, which could be adversely affected by the decision in this case.

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

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

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

/s/ Sarah W. Rubenstein Sarah W. Rubenstein (Mo. Bar No. 48874) Great Rivers Environmental Law Center 319 N. Fourth Street, Suite 800 St. Louis, Missouri 63102 (314) 231-4181 (314) 231-4184 (facsimile) srubenstein@greatriverslaw.org

Attorney for Dutchtown South Community Corporation

## **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 30th day of October, 2020, to all counsel of record.

/s/Sarah W. Rubenstein Sarah W. Rubenstein