

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-2011-0028
Revenues for Electric Service)

**RESPONSE TO ORDER DIRECTING FILING:
AMENDED APPLICATION TO INTERVENE OF NATURAL RESOURCES
DEFENSE COUNCIL AND RENEW MISSOURI**

Come now the Natural Resources Defense Council (NRDC) and Renew Missouri (Missouri Coalition for the Environment d/b/a Renew Missouri) and, pursuant to 4 CSR 240-2.075, apply to intervene herein and become parties for all purposes in respect to Ameren Missouri’s rate case. MCE/Renew Missouri has amended paragraph 2 of the original application to clarify the legal status of Renew Missouri as ordered by the Commission.

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. The Missouri Coalition for the Environment, d/b/a Renew Missouri, is a nonprofit corporation with approximately 750 members. Its office is at 6267 Delmar Blvd., Suite 2E, St. Louis, MO 63130; email pj@renewmo.org; telephone 314-727-0600;

fax 314-727-1665. The Coalition and many of its members are Ameren Missouri ratepayers. Renew Missouri is a registered fictitious name of MCE (see accompanying registration of fictitious name) under § 417.200, RSMo, by which the Coalition conducts its energy programs. Renew Missouri supports aggressive implementation of cost-effective utility DSM programs and renewable energy generation and procurement.

3. NRDC and Renew Missouri expect issues to arise in this case concerning demand side management and renewable energy, including the implementation of SB376, the Missouri Energy Efficiency Investment Act, § 393.1075, RSMo 2009, and the Renewable Energy Standard. At this point NRDC and Renew Missouri do not know what position they will take on the issues in this case.

4. 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. Correspondence, communications, orders and decisions may be sent to:

Henry B. Robertson (Mo. Bar No. 29502)
Great Rivers Environmental Law Center
705 Olive Street, Suite 614

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(314) 231-4181
(314) 231-4184 (facsimile)
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6. NRDC and Renew Missouri have interests different from those of the general public or average ratepayer, which could be adversely affected by the decision in this case.

7. It will serve the public interest for NRDC and Renew Missouri to be allowed to intervene.

WHEREFORE, NRDC and Renew Missouri respectfully request the Public Service Commission to grant this application to intervene.

/s/ Henry B. Robertson
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Attorney for NRDC and Renew Missouri

CERTIFICATE OF SERVICE

I hereby certify that a true and correct PDF version of the foregoing was sent by email on this 25th day of October, 2010, to the parties of record on the Service List.

/s/Henry B. Robertson
Henry B. Robertson