

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

In the Matter of Union Electric Company)	
d/b/a Ameren Missouri's 4 th Filing to)	
Implement Regulatory Changes in)	File No. EO-2023-0136
Furtherance of Energy Efficiency as)	
Allowed by MEEIA)	

MOTION TO INTERVENE OF NATURAL RESOURCES DEFENSE COUNCIL

COMES NOW the Natural Resources Defense Council ("NRDC"), pursuant to the Commission's March 27, 2023 Order Directing Notice of Application and Establishing Intervention Filing Date, and 20 CSR 4240-2.075, and for its Motion to Intervene, states as follows:

1. NRDC is a nonprofit corporation organized under the laws of New York with a Midwest office at 20 North Wacker Drive, Suite 1600, Chicago, IL 60606. NRDC has more than 4,800 members in Missouri, many of whom are Ameren customers. NRDC and its members are interested in promoting energy efficiency, peak demand reduction, and efficiency-friendly rate designs 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 and demand response programs.

2. NRDC has a strong interest in maximizing the reach of cost-effective demand-side programs, but has been known to disagree with Ameren on specific issues. At this point NRDC does not know what position it will take on the issues in this case.

3. NRDC has a continuing interest in the success of demand-side programs in Missouri. NRDC participated in the MEEIA rulemaking and subsequent MEEIA implementation dockets. It was a party to the stipulation and agreement reached in Ameren's first MEEIA plan in EO-2012-0142, a party to Ameren's MEEIA Cycle 2 case EO-2015-0055, as well as a party of

Ameren's MEEIA Cycle 3 case EO-2018-0211. It is also a member of Ameren's stakeholder advisory group for demand-side management.

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, Michigan, Kansas, Colorado, Wisconsin, New York, Oregon, Iowa, New Jersey and California. NRDC has regularly presented testimony before the U.S. 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 the undersigned legal counsel.

6. NRDC has environmental interests different from those of the general public or the average ratepayer, which could be adversely affected by the decision in this case.

7. It will serve the public interest for the Commission to grant this motion to intervene.

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

Sarah Rubenstein (MO Bar #48874)
Great Rivers Environmental Law Center
319 N. Fourth Street, Suite 800
St. Louis, Missouri 63102
(314) 231-4181
srubenstein@greatriverslaw.org

WHEREFORE, NRDC respectfully requests the Public Service Commission grant this Motion to Intervene.

Respectfully Submitted,

/s/ Sarah Rubenstein

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Counsel for Natural Resources Defense Council

CERTIFICATE OF SERVICE

I hereby certify that on this 10th day of April, 2023, a true and correct copy of the foregoing pleading was filed on EFIS and sent by email to all counsel of record.

/s/ Sarah Rubenstein

Sarah Rubenstein