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

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

File No. EO-2021-0021

## **APPLICATION TO INTERVENE OF** NEW NORTHSIDE MISSIONARY BAPTIST CHURCH, INC.

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Comes now New Northside Missionary Baptist Church, Inc. ("NNMBC"), and, pursuant to 20 CSR 4240-2.075, applies to intervene herein and become a party for all purposes.

1. NNMBC is a nonprofit corporation organized under the laws of Missouri and located at 8645 Goodfellow, St. Louis, Missouri 63147. Almost all, if not all, of its members and visitors are Ameren Missouri ratepayers as are almost all, if not all, of the members of the community NNMBC serves.

2. Tenets of NNMBC's faith call upon it and its members it to be stewards of all which God has created, and to be responsible for using God's blessings for His glory, our benefit, and the welfare of others.

3. Located in North St. Louis, NNMBC works in its community to promote the greater good, the public health, and equity and justice. NNMBC believes it will accomplish these objectives, in part, by encouraging Ameren Missouri to provide clean affordable renewable energy to its community members, and by encouraging Ameren Missouri to expand its energy efficiency programs so that members of the community it serves may take advantage of energy efficiency measures.

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

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

6. NNMBC has 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 NNMBC to be allowed to intervene.

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

<u>/s/ Bruce A. Morrison</u> Bruce A. Morrison (Mo. Bar No. 38359) Great Rivers Environmental Law Center 319 N. Fourth Street, Suite 800 St. Louis, Missouri 63102 (314) 231-4181 (314) 231-4184 (facsimile) bamorrison@greatriverslaw.org

Attorney for NNMBC

## **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/ Bruce A. Morrison Bruce A. Morrison