

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

In the Matter of Ameren Missouri’s Notice of a)
Change in its Preferred Resource Plan) File No. EO-2022-0362

MOTION TO INTERVENE OF NATURAL RESOURCES DEFENSE COUNCIL

Natural Resources Defense Council (NRDC), pursuant to 20 CSR 4240-2.075, moves to intervene in this docket. In support of its motion to intervene, NRDC states the following.

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; contact Ashok Gupta at that address or at 212-243-4351. It has over 4,800 members in Missouri, many of whom are Ameren Missouri ratepayers. NRDC and its members are interested in promoting energy efficiency, peak demand reduction and renewable energy resources to meet Missouri’s energy needs and to do so more cost-effectively than conventional fossil-fuel and nuclear generation.

2. NRDC has a longstanding interest in DSM, the effectiveness of Ameren Missouri’s DSM programs so far, the customer benefits and utility costs resulting from demand-side management and distributed energy resources, and demand-side rates. NRDC also expects to see progress made in the transition away from coal and in the direction of renewable resources, energy storage, beneficial electrification, power purchases, satisfaction of corporate and municipal clean energy goals, and distribution planning.

3. NRDC will bring significant expertise to this proceeding. NRDC has intervened and/or provided testimony on these issues in public utility commission proceedings in many states, including Missouri, 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. NRDC has interests different from those of the general public or average ratepayer, which could be adversely affected by the decision in this case.

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

6. All communications and pleadings in this case should be directed to:

Bruce A. Morrison
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(314) 231-4181
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7. It will serve the public interest for the Missouri Public Service Commission to grant this application to intervene.

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

/s/ Bruce A. Morrison
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Attorney for Natural Resources Defense Council

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing was filed on EFIS and sent by email, on this 15th day of July, 2022, to all counsel of record.

/s/ Bruce A. Morrison