

BEFORE THE PUBLIC SERVICE COMMISSION
OF THE STATE OF MISSOURI

In the Matter of Union Electric Company d/b/a)	
Ameren Missouri's Voluntary Green Program/)	<u>Case No. EO-2013-0307</u>
Pure Power Program Tariff Filing)	Tariff No. JE-2013-0197

MOTION OF RENEW MISSOURI FOR LEAVE TO INTERVENE

Comes now, Earth Island Institute d/b/a Renew Missouri, and pursuant to 4 CSR 240-2.075, hereby applies to intervene and become a party to the above-captioned case. In support of its motion to intervene, Renew Missouri states as follows:

1. Earth Island Institute is a non-profit corporation organized under the laws of California with its principal place of business at 2150 Allston Way, Suite 460, Berkeley, CA 94704. Earth Island has a Certificate of Authority for a Foreign Nonprofit granted by the Missouri Secretary of State. Renew Missouri is a registered fictitious name of Earth Island Institute under § 417.200, RSMo, with its principal place of business at 910 E. Broadway, Suite 205, Columbia, MO 65201. Renew Missouri is a non-profit policy group whose mission is to make Missouri a leading state in renewable energy and energy efficiency by 2016.

2. Pleadings, notices and other correspondence concerning this matter should be addressed to the undersigned counsel.

3. Renew Missouri's interests focus on the environmental, economic, business interests, and health benefits of renewable energy generation in Missouri, and hence are different from those of the general public and could be adversely affected by an order approving or extending Ameren Missouri's Pure Power Program Tariff. Renew Missouri has been involved with nearly every policy affecting renewable energy in the State of Missouri since 2006; it was instrumental in both the drafting and passage of the Net-Metering and Easy Connection act

(2007), the Missouri Renewable Energy Standard (2008), and the Property Assessment Clean Energy Act (2010). Additionally, Renew Missouri's Director PJ Wilson was involved in the approval process for Ameren's original Pure Power tariff in 2007.

4. Renew Missouri is prepared to file testimony in this case on Friday, February 22, 2013 to meet the deadline for cross-surrebuttal and surrebuttal testimony, as established by the Procedural Schedule.

5. Renew Missouri recognizes that the 30 days for intervention allowed by 4 CSR 240-2.075 have passed, but requests intervention so that it may submit its testimony in this case prior to the hearing on March 6, 2013.

6. Good cause exists to grant Renew Missouri late intervention. Renew Missouri did not see a need to intervene until after its staff reviewed testimony in the case, whereupon it identified arguments and perspectives it could provide in addition to those put forth by Michael Ensrud of PSC Staff. Renew Missouri brings a unique perspective to voluntary green pricing programs like Ameren's that has not yet been represented in this case.

7. It will serve the public interest for the PSC to grant this application to intervene.

WHEREFORE, Renew Missouri respectfully requests that the Public Service Commission grant its application to intervene.



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ATTORNEY FOR RENEW MISSOURI

CERTIFICATE OF SERVICE

I hereby certify that a true and correct PDF version of the foregoing was filed on EFIS and delivered on this 20th day of February, 2013, to all counsel of record:

A handwritten signature in black ink, appearing to read "Andrew J. Linhares", is written over a horizontal line.

Andrew J. Linhares