

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

In the Matter of the Renewable Energy Standard)
Compliance Report 2013 and Renewable Energy) File No. EO-2014-0291
Standard Compliance Plan 2014-2016)

APPLICATION TO INTERVENE

COMES NOW Earth Island Institute d/b/a Renew Missouri (“Renew Missouri”), pursuant to 4 CSR 240-2.075, and for its application to intervene in the above-styled case, states as follows:

1. Renew Missouri is a project of Earth Island Institute, a not-for-profit corporation organized under the laws of California. Renew Missouri is a registered fictitious name of Earth Island Institute under Section 417.200, RSMo. Earth Island Institute has a Certificate of Authority for a Foreign Nonprofit granted by the Missouri Secretary of State.

2. Renew Missouri was instrumental in the passage of Proposition C, or the Missouri Renewable Energy Standard (“RES”). Renew Missouri also participated in the RES rulemaking process. Renew Missouri has an interest in the full implementation and enforcement of the RES in that the organization’s mission includes the promotion of renewable energy in Missouri.

3. Renew Missouri’s interest is different than that of the general public and may be adversely affected by a final order arising from this case.

4. Renew Missouri’s intervention will serve the public interest by assisting the Commission’s record for decision in this case.

WHEREFORE, Renew Missouri requests that it be permitted to intervene and be made a party to this case for all purposes.

Respectfully Submitted,

/s/ Andrew J. Linhares

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ATTORNEY FOR EARTH ISLAND
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CERTIFICATE OF SERVICE

I hereby certify that copies of the foregoing have been served electronically on all counsel of record this 18th day of April, 2014.

/s/ Andrew J. Linhares

Andrew J Linhares, # 63973