

BEFORE THE PUBLIC SERVICE COMMISSION  
OF THE STATE OF MISSOURI

In the Matter of the Application of Union Electric	)	
Company d/b/a Ameren Missouri for Permission and	)	File No. EA-2019-0181
Approval and a Certificate of Convenience and	)	
Necessity under 4 CSR 240-3.105	)	

**MOTION TO INTERVENE OF SIERRA CLUB**

Comes now Sierra Club, and pursuant to 4 CSR 240-2.075, applies to intervene herein. In support of its motion to intervene, Sierra Club states the following.

1. Sierra Club is a nonprofit organization organized and existing under the nonprofit corporation laws of the state of California. Sierra Club has more than 700,000 members nationally and over 10,000 members in Missouri. The Missouri Chapter of the Club has an office at 2818 Sutton Blvd, St. Louis, MO 63143; email [john.hickey@sierraclub.org](mailto:john.hickey@sierraclub.org); telephone 314-644-1011. Sierra Club exists for the purposes of preserving and protecting environmental values. Consistent with this mission, Sierra Club has long advocated for investment in clean, low-cost energy resources in the state of Missouri and across the country. Sierra Club is interested in promoting wind energy as an alternative to fossil fuel generation.

2. Sierra Club's interests in promoting wind energy are different from those of the general public in their environmental emphasis. Sierra Club seeks to move away from fossil-fueled electricity to energy efficiency and renewable energy in order to reduce pollution and ameliorate the adverse effects of fossil energy on the climate. The Sierra Club's interests would be positively affected by the addition of wind energy in Missouri.

On the other hand, the Sierra Club's interests could be adversely affected if the project were to harm sensitive lands, waters or species.

3. Sierra Club has been involved in numerous MPSC dockets concerning the Renewable Energy Standard; integrated resource planning dockets; the two Grain Belt Express Clean Line wind transmission CCN dockets, EA-2014-0207 and EA-2016-0358; Empire District Electric's Customer Savings Plan, EO-2018-0092; and Ameren's two recent wind CCN cases, EA-2018-0202 and EA-2019-0021.

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

Henry B. Robertson (Mo. Bar No. 29502)  
Great Rivers Environmental Law Center  
319 N. Fourth Street, Suite 800  
St. Louis, Missouri 63102  
(314) 231-4181  
(314) 231-4184 (facsimile)  
[hrobertson@greatriverslaw.org](mailto:hrobertson@greatriverslaw.org)

5. Sierra Club is not yet certain of the position it will take in this case.

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

WHEREFORE, Sierra Club respectfully requests the Public Service Commission to grant the application to intervene.

/s/ Henry B. Robertson  
Henry B. Robertson (Mo. Bar No. 29502)  
Great Rivers Environmental Law Center  
319 N. Fourth Street, Suite 800  
St. Louis, Missouri 63102  
(314) 231-4181  
(314) 231-4184 (facsimile)  
[hrobertson@greatriverslaw.org](mailto:hrobertson@greatriverslaw.org)

Attorney for Sierra Club

**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 24th day of May, 2019, to all counsel of record.

/s/ Henry B. Robertson  
Henry B. Robertson