

**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 Approval and Certificates of Public                            )  
Convenience and Necessity Authorizing it to                    )  
Construct Renewable Generation Facilities                        )            File No. EA-2023-0286

**SIERRA CLUB’S MOTION TO INTERVENE**

Sierra Club, pursuant to 20 CSR 4240-2.075, moves to intervene in this docket. In support of its motion to intervene, Sierra Club states:

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 more than 10,000 members in Missouri, many of whom reside in Ameren Missouri’s service territory and are Ameren Missouri ratepayers.

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

Ethan Thompson  
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319 North Fourth Street, Suite 800  
St. Louis, MO 63102  
(314) 231-4181  
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3.       Sierra Club exists for the purpose of preserving and protecting environmental values. Consistent with this mission, Sierra Club for many years has advocated for transitioning the electricity sector from coal- and gas-burning generation to cleaner and lower cost forms of energy, such as energy efficiency, renewable energy sources, and energy storage. Sierra Club’s interest in protecting and enhancing the quality of ambient air and water throughout the state will

be favorably affected if Ameren Missouri aggressively pursues renewable energy projects that will displace fossil fuel generation. Sierra Club is concerned with emissions of greenhouse gases that cause climate change, and with pollution from coal and gas that causes a host of health problems including asthma, mercury poisoning, sudden infant death syndrome, and respiratory issues.

4. Sierra Club has previously been a party to several Ameren Missouri triennial IRP and IRP update proceedings, as well as rate cases, energy efficiency proceedings, renewable infrastructure CCNs, and other regulatory dockets.

5. Sierra Club's interest in promoting cleaner and lower-cost forms of energy is different from that of the general public and could be adversely affected by unreasonable resource planning decisions that prolong reliance on aging coal-burning plants and discourage renewable generation. Sierra Club's intervention would serve the public interest in promoting prudent resource planning, public health, and the reduction of greenhouse gas emissions.

6. Sierra Club has not yet determined the positions it will take in this matter.

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

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

/s/ Ethan Thompson

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Attorney for Sierra Club

## **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 the 12th day of July, 2023, to all counsel of record.

/s/ Ethan Thompson  
Ethan Thompson