BEFORE THE PUBLIC SERVICE COMMISSION OF THE STATE OF MISSOURI

In the Matter of Union Electric Company d/b/a Ameren Missouri's Tarrifs to Increase Its Revenues for Electric Service

File No. ER-2016-0179
Tariff No. YE-2017-0003

APPLICATION TO INTERVENE OF RENEW MISSOURI

COMES NOW, Earth Island Institute d/b/a Renew Missouri ("Renew Missouri"), pursuant to rule 4 CSR 240-2.075 and the Commission's July 12, 2016 *Notice of Hearing, Order Setting Conference Date, Directing Notice of Action, Establishing Intervention Date, and Directing Filings*, and applies to intervene in the above-styled case. In support of its Application, Renew Missouri states:

1. On July 1, 2016, Union Electric Company d/b/a Ameren Missouri ("Ameren") filed tariffs to implement a general rate increase for its electric service with the Commission.

2. On July 12, 2016, the Commission issued its *Notice of Contested Case and Order Suspending Tariff and Delegating Authority;* and on the same day issued its *Notice of Hearing; Order Setting Conference Date, Directing Notice of Action, Establishing Intervention Date, and Directing Filings* which set an intervention deadline of July 25, 2016.

3. 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 not-for-profit clean energy policy and advocacy group whose mission is to transform Missouri into a leading state in renewable energy and energy efficiency. 4. As advocates for the furtherance of renewable energy and energy efficiency investment, as well as best-practices clean energy policy in Missouri, Renew Missouri's interests are different than those of the general public and may be adversely affected by a final order arising from this case. Granting Renew Missouri intervention will serve the public interest by assisting the Commission's record for decisions in this case, and no party will be adversely affected by such intervention.

5. Pleadings, notices and other correspondence in this case should be directed to:

Andrew J. Linhares Staff Attorney, Renew Missouri 910 E. Broadway, Ste. 205 Columbia, MO 65201 (314) 471-9973 (T) (314) 558-8450 (F) Andrew@renewmo.org

WHEREFORE, Renew Missouri submits this Application to Intervene and respectfully

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 INSTITUTE d/b/a RENEW MISSOURI

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing document was mailed, faxed, or emailed to all counsel of record on this <u>19th</u> day of July 2016.

/s/ Andrew J. Linhares Andrew J. Linhares