

BEFORE THE PUBLIC SERVICE COMMISSION  
OF THE STATE OF MISSOURI

In the Matter of Union Electric Company d/b/a                    )  
Ameren Missouri's Tariffs to Decrease its                    )        Case No. ER-2019-0335  
Revenues for Electric Service                                    )

**APPLICATION TO INTERVENE OF NATURAL RESOURCES DEFENSE  
COUNCIL**

Comes now the Natural Resources Defense Council (NRDC) and, pursuant to 4 CSR 240-2.075, applies to intervene herein and become a party for all purposes.

1. NRDC is a nonprofit corporation organized under the laws of New York with a Midwest office at 20 North Wacker Drive, Suite 1600, Chicago, IL 60606; contact Ashok Gupta at that address or at 212-243-4351. It has over 4,800 members in Missouri. NRDC and its members are interested in promoting energy efficiency, peak demand reduction and renewable energy resources to meet Missouri's energy needs. NRDC has been active in PSC dockets concerning the Missouri Energy Efficiency Investment Act, electric utility rate cases and IRPs, rulemakings, and working dockets on renewable energy, efficiency, electric vehicles and regulatory policy.

2. NRDC expects issues to arise in this case concerning rate design and its impact on customer benefits resulting from demand-side management and distributed renewable energy. At this point NRDC does not know what position it will take on the issues in this case.

3. NRDC will bring significant expertise to this proceeding. The Staff of NRDC has extensive history with the design and implementation of utility programs and policies designed to deploy cost-effective renewable energy, energy efficiency and peak

demand reduction to benefit the public. NRDC has intervened and/or provided testimony on these issues in public utility commission proceedings in many states, including Illinois, Ohio, Wisconsin, New York, Oregon, Iowa, New Jersey and California. NRDC has regularly presented testimony before the US Congress and various state legislatures related to the electric utility industry's use of energy efficiency resources, rate design, utility planning and other topics relevant to this proceeding.

4. Correspondence, communications, orders and decisions may be sent to the undersigned legal counsel.

5. NRDC has interests different in their environmental focus from those of the general public or average ratepayer, which could be adversely affected by the decision in this case.

6. It will serve the public interest for NRDC to be allowed to intervene.

WHEREFORE, NRDC respectfully requests the Public Service Commission to grant this application to intervene.

/s/ Henry B. Robertson  
Henry B. Robertson (Mo. Bar No. 29502)  
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Attorney for NRDC

**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 17th day of July, 2019, to all counsel of record.

/s/Henry B. Robertson  
Henry B. Robertson