

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 SIERRA CLUB

Come 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 750,000 members nationally and over 11,000 members in Missouri, many of whom reside in Ameren's service territory and are Ameren ratepayers. The Missouri Chapter of Sierra Club has an office at 2818 Sutton Blvd, St. Louis, MO 63143; email john.hickey@sierraclub.org; telephone 314-644-1011. Sierra Club exists for the purpose of preserving and protecting environmental values, and for years has been actively concerned with protecting air and water quality throughout the state of Missouri. Sierra Club's interest in protecting and enhancing the quality of ambient air and water throughout the state will be favorably affected if Ameren aggressively pursues renewable energy, energy efficiency, and demand response programs that displace fossil fuel generation. Sierra Club is concerned with the build-up of greenhouse gases that lead to global warming, and with pollution from non-renewable sources that can cause a host of health problems including asthma, mercury poisoning, sudden infant death syndrome, respiratory problems, and other issues. Sierra Club has been actively encouraging the use

of energy efficiency and renewable energy sources.

2. 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

3. Sierra Club has been a party to Ameren's rate cases, ER-2014-0258 and ER-2016-0179; its IRP dockets from EO-2006-0240 onwards; and MEEIA, vehicle electrification, wind CCN and other cases.

4. Movant's interests focus on environmental protection and hence are different from those of the general public and could be adversely affected by an order approving environmental retrofits to aging coal-fired power plants, rate designs that disincentivize energy efficiency or conservation, or continued utilization of excess coal-based generating capacity where more prudent and cost-effective alternatives exist.

5. Sierra Club is interested in rate design and cost recovery issues and in ensuring that Ameren's rate designs advance its customers' and Sierra Club's interests in demand-side programs and renewable energy.

6. Movant is not yet certain of the position it will take in this case.

7. 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.

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

Attorney for applicant

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