

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 NRDC**

Comes now the Natural Resources Defense Council (“NRDC”), and pursuant to 4 CSR 240-2.075, applies to intervene herein. In support of its motion to intervene, NRDC states the following.

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’s interests in promoting wind energy are different from those of the general public in their environmental emphasis. NRDC seeks to transition 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. NRDC’s interests would be positively affected by the addition of wind energy, particularly when sited in

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

3. 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)

4. NRDC strongly favors wind energy as a general matter but is not yet certain of the position it will take in this case.

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

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

/s/ Henry B. Robertson  
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[hrobertson@greatriverslaw.org](mailto:hrobertson@greatriverslaw.org)  
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 23rd day of May, 2019, to all counsel of record.

/s/ Henry B. Robertson  
Henry B. Robertson