

BEFORE THE PUBLIC SERVICE COMMISSION  
OF THE STATE OF MISSOURI

In the Matter of the Compliance of Union Electric        )  
Company d/b/a Ameren Missouri with Certain            ) **File No. EO-2019-0044**  
Requirements Related to SB 564 and Related Matters    )

**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. The Commission has not set an intervention deadline for this case. Ameren filed its five-year capital plan on February 14, 2019, much of it being designated confidential.

2. 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 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.

3. The Company’s plan specifically includes “smart” energy upgrades and distribution planning, which NRDC has advocated in multiple dockets. Knowledge of Ameren’s plan will inform and give direction to NRDC’s work on numerous dockets

going forward. Familiarity with the plan requires access to the confidential portions. Therefore NRDC, like MIEC, seeks to intervene in what is basically a repository file.

4. NRDC's interests 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.

5. 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  
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[hrobertson@greatriverslaw.org](mailto:hrobertson@greatriverslaw.org)

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

/s/ Henry B. Robertson  
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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 25th day of February, 2019, to all counsel of record.

/s/ Henry B. Robertson  
Henry B. Robertson