## **BEFORE THE PUBLIC SERVICE COMMISSION OF THE STATE OF MISSOURI**

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In the Matter of the Application of Union Electric Company d/b/a Ameren Missouri for Permission and Approval and a Certificate of Public Convenience and Necessity Authorizing it to Construct, Install, Own, Operate, Maintain and Otherwise Control and Manage a Utility Waste Landfill and Related Facilities at its Labadie Energy Center.

Case No. EA-2012-0281

## INTERVENORS' JOINDER IN THE OFFICE OF THE PUBLIC COUNSEL'S LIMITED MOTION FOR RECONSIDERATION

Intervenors Labadie Environmental Organization and Sierra Club give notice of their joinder in The Office of the Public Counsel's Limited Motion for Reconsideration. Intervenors join Public Counsel in asking the Commission to reconsider its July 2, 2014, Report and Order and impose a condition that Ameren Missouri provide evidence of financial responsibility to remediate damage and contamination caused by the landfill.

Respectfully submitted,

/s/ Maxine I. Lipeles Maxine I. Lipeles, MBE # 32529 Elizabeth J. Hubertz, MBE # 58403 Interdisciplinary Environmental Clinic Washington University School of Law 1 Brookings Drive, Campus Box 1120 St. Louis, MO 63130 Telephone: (314) 935-8760 Fax: (314) 035-5171 ehubertz@wulaw.wustl.edu milipele@wulaw.wustl.edu

## **CERTIFICATE OF SERVICE**

I hereby certify that a true and correct copy of this document was sent via email on July 16, 2014, to all parties of record.

/s/ Maxine I. Lipeles