

BEFORE THE PUBLIC SERVICE COMMISSION
OF THE STATE OF MISSOURI

In the Matter of the Empire District Electric)	
Company's 2019 Triennial Compliance Filing)	File No. EO-2019-0049
Pursuant to 4 CSR 240-22)	

APPLICATION TO INTERVENE OF SIERRA CLUB

Comes 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 GMO's service territory and are GMO ratepayers. The Missouri Chapter of Sierra Club has an office at 7164 Manchester, 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. Consistent with this mission, Sierra Club for many years has advocated for transitioning the electricity sector from coal-fired generation to cleaner and lower cost forms of energy, such as energy efficiency and renewable energy sources. Sierra Club is concerned with emissions of greenhouse gases that lead to global warming, and with pollution from non-renewable sources that cause a host of health problems including asthma, mercury poisoning, sudden infant death syndrome, respiratory problems, and other problems.

2. Sierra Club was a party to Empire's Customer Savings Plan and wind CCN

cases, EO-2018-0092 and EO-2019-0010. Sierra Club is interested in the feasibility and cost-effectiveness of Liberty-Empire's plan to retire coal and gas units and proceed with a first-time MEEIA program and substitute solar energy and energy storage for fossil resources going forward.

3. Sierra Club's interest in promoting cleaner and lower cost forms of energy is different in emphasis from those of the general public and could be adversely affected by prolonged reliance on an aging coal plant, inadequate levels of DSM programs, and continued discouragement of renewable generation. Sierra Club's staff and consultants have unique and extensive experience in analyzing the feasibility and cost-effectiveness of coal and its alternatives.

4. Sierra Club is not yet certain of the position it will take in this case.

5. It will serve the public interest in prudent resource planning, public health, and the curtailment of greenhouse gas emissions for the PSC to grant this application to intervene.

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

/s/ Henry B. Robertson
Henry B. Robertson (Mo. Bar No. 29502)
Great Rivers Environmental Law Center
319 N. Fourth Street, Suite 800
St. Louis, Missouri 63102
Tel. (314) 231-4181
Fax (314) 231-4184
hrobertson@greatriverslaw.org

Attorney for Sierra Club

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 23d day of July, 2019, to all counsel of record.

/s/ Henry B. Robertson
Henry B. Robertson