

BEFORE THE PUBLIC SERVICE COMMISSION
OF THE STATE OF MISSOURI

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| In the Matter of Ameren Missouri's Request for a |) | |
| Variance from Certain Provisions of 4 CSR 240 |) | |
| Chapter 22 Regarding Electric Utility Resource |) | File No. EE-2017-0098 |
| Planning. |) | |

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, many of whom are Ameren ratepayers. NRDC and its members are interested in promoting energy efficiency, peak demand reduction and renewable energy resources to meet Missouri's energy needs. NRDC seeks to intervene in this proceeding in order that its members and others may benefit from well designed and cost-effective energy efficiency programs.

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)
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3. NRDC has been a party in other Commission dockets involving Ameren, including ER-2014-0258; its MEEIA dockets going back to the first, EO-2012-0142; and its Chapter 22 dockets going back to EE-2010-0243.

4. Before the filing of the pleadings in this case, NRDC discussed certain of the variances with Ameren and reached agreement with the company on certain changes. NRDC seeks intervention in order to explain and protect these agreed changes.

5. Movant's interests are different from those of the general public and could be adversely affected by the Commission's order in this case.

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

7. For the foregoing reasons, it will serve the public interest for the PSC to grant this application to intervene.

WHEREFORE, the Natural Resources Defense Council respectfully requests the Public Service Commission to grant the application to intervene.

/s/ Henry B. Robertson
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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 24th day of October, 2016, to all counsel of record:

/s/ Henry B. Robertson
Henry B. Robertson