

members and others may benefit from well designed and cost-effective energy efficiency programs. NRDC will bring significant expertise to this proceeding. The Staff of NRDC has extensive history with the design and implementation of utility programs and policies designed to deploy energy efficiency and peak demand reduction to benefit the public. NRDC has intervened and/or provided testimony on these issues in public utility commission proceedings in many states, including Missouri, Illinois, Ohio, Wisconsin, New York, Oregon, Iowa, New Jersey and California. NRDC has regularly presented testimony before the US Congress and various state legislatures related to the electric utility industry's use of energy efficiency resources, rate design, utility planning and other topics relevant to this proceeding.

3. Movant's interests focus on environmental protection and hence are different from those of the general public and could be adversely affected by an order approving inadequate levels of DSM programs or an unreasonable demand-side investment mechanism.

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

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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 21st day of January, 2014, to all counsel of record:

/s/ Henry B. Robertson
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