



of preserving and protecting environmental values. Consistent with this mission, Sierra Club has long advocated for investment in clean, low-cost energy resources, such as energy efficiency and other demand-side programs, in the state of Missouri and across the country. Sierra Club is interested in promoting energy efficiency and peak demand reduction, and has been actively encouraging the use of such energy sources. Sierra Club has jointly or individually intervened and/or provided testimony on these and similar issues in a multitude of similar proceedings in a number of states including Arkansas, California, Colorado, Louisiana, Minnesota, Missouri, North Carolina, Ohio, Oklahoma, Pennsylvania, Virginia, Washington, and West Virginia. Sierra Club has also regularly presented testimony before the U.S. Congress and various state legislatures on issues related to the electric utility industry, including energy efficiency.

3. Sierra Club's interests in promoting energy efficiency and other clean, low-cost energy resources is 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. Moreover, Sierra Club's staff and consultants have extensive experience in analyzing the potential for cost-effective energy efficiency, DSM program design, and cost recovery, and Sierra Club's intervention would serve the public interest.

4. Sierra Club 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, Sierra Club 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  
Henry B. Robertson