

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

In the Matter of the Application of Union)	
Electric Company d/b/a Ameren Missouri)	File No. ET-2018-0063
for Approval of 2017 Green Tariff)	

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 825,000 members nationally and over 11,500 members in Missouri, many of whom reside in the service territory of Union Electric Company d/b/a Ameren Missouri (“Ameren”) and are Ameren ratepayers. These members are directly affected by the rates, policies, terms, and conditions governing Ameren’s provision of electricity to them. As a result, these members have a strong interest in having their electricity provided in a dependable and environmentally responsible manner, and at costs that are competitive over the long term. These interests are implicated by the proposed Green Tariff.

2. The Missouri Chapter of Sierra Club has an office at 2818 Sutton Blvd, St. Louis, MO 63143; email john.hickey@sierraclub.org; telephone 314-644-1011. Thus, the Sierra Club is itself an Ameren customer, and a potential participant in an expanded Green Tariff offering.

3. As demonstrated in Sierra Club’s numerous prior interventions in matters before this Commission, Sierra Club has an interest in promoting low-cost, clean energy generation. These interests are distinct from those of the public at large and may be affected, either positively or negatively, by Ameren’s proposed Green Tariff. Sierra Club is uniquely situated to represent the interest of its members in this proceeding as a result of its expertise and experience in ratemaking and clean energy legal and policy matters. Further, Sierra Club may provide the

Commission with legal, technical, and economic information to help develop a record that will provide the Commission with evidence on issues that may not otherwise be analyzed.

4. Sierra Club exists for the purpose of preserving and protecting environmental values in a manner that ensures the benefits of a healthy environment are extended to all members of the community. Sierra Club has been actively concerned with protecting air and water quality throughout the state of Missouri. Sierra Club's interest in protecting and enhancing the quality of ambient air and water throughout the state will be favorably affected if Ameren acts to displace its fossil fuel generation through renewable energy, energy efficiency, and demand response programs. Sierra Club is concerned with the build-up of greenhouse gases that lead to global warming, and with pollution from non-renewable fossil fuel sources that can result in a host of health problems including asthma, mercury poisoning, sudden infant death syndrome, and respiratory, cardiovascular, and reproductive harms. To limit these climate and public health impacts, Sierra Club actively supports the increased use of cost-effective renewable generating resources.

5. Sierra Club seeks to intervene in this proceeding because of its strong interest in addressing the barriers to the widespread adoption of renewable energy. Consumer demand for clean energy, as embodied in renewable energy goals of as much as 100% by major companies, represents an important market. In addition, local governments are rapidly adopting goals to transition to 100% renewable energy supply, or exploring the potential for such a transition, and demanding access to renewable energy resources. It is in the interests of Ameren and its existing customers to provide this service as a means of encouraging such companies to locate in and invest in this area, and to prevent existing customers from choosing alternative grid service.

6. Correspondence, communications, orders, and decisions may be sent to:

/s/ Henry B. Robertson
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319 N. Fourth Street, Suite 800
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and

Casey Roberts
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7. Sierra Club supports “green tariffs” in concept but desires to explore the details in Ameren’s proposal. Therefore Sierra Club is not yet certain of the position it will take in this case.

8. It will serve the public interest for the Public Service Commission 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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Attorney for applicant

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 11th day of December, 2017, to all counsel of record:

/s/ Henry B. Robertson
Henry B. Robertson