

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 for Approval) **File No. ET-2016-0246**
Of a Tariff Setting a Rate for Electric Vehicle)
Charging Stations)

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.

2. NRDC seeks to intervene in this proceeding because of its interest in the environmental and consumer benefits of electric vehicles (EVs). EVs eliminate the tailpipe pollution that emanates from gasoline-powered cars and reduce greenhouse gas emissions compared to gasoline cars, especially when they can charge with electricity that contains a higher proportion of renewable generation.

3. 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
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(314) 231-4181
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4. NRDC participated in the Commission's working docket on EV charging facilities, EW-2016-0123. NRDC provided comments and other written materials, and Noah Garcia appeared as a panelist from NRDC at the workshop held at the Commission on May 25, 2016.

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. NRDC is generally in favor of electric vehicles but 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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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 30th day of August, 2016, to all counsel of record:

/s/ Henry B. Robertson
Henry B. Robertson