

BEFORE THE PUBLIC SERVICE COMMISSION
OF THE STATE OF MISSOURI

In the Matter of Union Electric Company d/b/a)
Ameren Missouri's 2nd Filing to Implement) **File No. EO-2015-0055**
Regulatory Changes in Furtherance of Energy)
Efficiency as Allowed by MEEIA)

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 application 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 625,000 members nationally and over 8,800 members in Missouri, many of whom reside in Ameren's service territory and are Ameren ratepayers. 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.

2. Sierra Club exists for the purpose 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, throughout the state of Missouri and across the country. Sierra Club is interested in promoting energy efficiency and peak demand reduction programs, and has been actively encouraging the use of such energy resources. Sierra Club has jointly or individually intervened and/or provided testimony on these and similar issues in a multitude of similar proceedings in Missouri and a number of other states including

Arkansas, California, Colorado, Kentucky, Louisiana, Minnesota, 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 has a continuing interest in the success of demand-side programs across Missouri, including in Ameren's service territory. Sierra Club participated in the MEEIA rulemaking. Sierra Club also has been a party to Ameren rate cases ER-2012-0166 and ER-2014-0258; to Ameren's original MEEIA plan docket, EO-2012-0142, and the Stipulation and Agreement reached therein; to Ameren's Integrated Resource Plans going back to 2005; and to KCPL-GMO and KCPL's MEEIA dockets, EO-2012-0009 and EO-2014-0095, and the Stipulations and Agreements reached therein. The Club is a member of Ameren's stakeholder advisory group for demand-side management.

4. Sierra Club's specific interests in promoting energy efficiency and other clean, low-cost energy resources are different from the overall interests of the general public and could be adversely affected by an order approving inadequate levels of DSM programs and energy savings. Moreover, Sierra Club has a wealth of knowledge and experience in the complex issues pertaining to demand-side programs and associated cost recovery mechanisms, which are the subjects of Ameren's application in this case, and Sierra Club's intervention would serve the public interest by assisting the Commission in fully considering this matter.

5. Sierra Club is not yet certain of the position it will take in this case, and

reserves the right to take positions on specific issues as this case proceeds.

6. It will serve the public interest in public health and the curtailment of greenhouse gases for the PSC to grant this application to intervene.

WHEREFORE, Sierra Club respectfully requests the Public Service Commission to grant the application to intervene.

/s/ Henry B. Robertson
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Attorney for Sierra Club

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 12th day of January, 2015, to all counsel of record.

/s/ Henry B. Robertson
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