

BEFORE THE PUBLIC SERVICE COMMISSION
OF THE STATE OF MISSOURI

In The Matter of Union Electric Company d/b/a)
Ameren Missouri's 2020 Utility Resource)
Filing Pursuant to 20 CSR 4240 – Chapter 22)

File No. EO-2021-0021

**APPLICATION TO INTERVENE OF NATURAL RESOURCES DEFENSE
COUNCIL**

Comes now the Natural Resources Defense Council (NRDC) and, pursuant to 20 CSR 4240-2.075, applies to intervene herein and become a party for all purposes.

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 Missouri ratepayers. NRDC and its members are interested in promoting energy efficiency, peak demand reduction and renewable energy resources to meet Missouri's energy needs and to do so more cost-effectively than conventional fossil-fuel and nuclear generation.

2. NRDC has a longstanding interest in DSM, the effectiveness of Ameren's DSM programs, the customer benefits and utility costs resulting from demand-side management and distributed energy resources, and demand-side rates. NRDC also expects to see progress made in the transition away from coal and in the direction of renewable resources, energy storage, beneficial electrification, power purchases, satisfaction of corporate and municipal clean energy goals, and distribution planning.

3. At this point NRDC does not know what position it will take on the issues

in this case.

4. NRDC will bring significant expertise to this proceeding. 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.

5. Correspondence, communications, orders and decisions may be sent to the undersigned legal counsel.

6. NRDC has interests different from those of the general public or average ratepayer, which could be adversely affected by the decision in this case.

7. It will serve the public interest for NRDC to be allowed to intervene.

WHEREFORE, NRDC respectfully requests the Public Service Commission to grant this application to intervene.

/s/ Henry B. Robertson
Henry B. Robertson (Mo. Bar No. 29502)
Great Rivers Environmental Law Center
319 N. Fourth Street, Suite 800
St. Louis, Missouri 63102
(314) 231-4181
(314) 231-4184 (facsimile)
hrobertson@greatriverslaw.org

Attorney for NRDC

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 5th day of October, 2020, to all counsel of record.

/s/Henry B. Robertson
Henry B. Robertson