

BEFORE THE PUBLIC SERVICE COMMISSION
OF THE STATE OF MISSOURI

In the Matter of an Investigation of Missouri)	
Jurisdictional Generator Self-Commitments into)	File No. EW-2019-0370
SPP and MISO Day-Ahead Energy Markets)	

**NRDC’S MOTION TO INTERVENE AND REQUEST FOR EXPEDITED
CONSIDERATION**

Comes now the Natural Resources Defense Council (NRDC) and applies to intervene pursuant to 4 CSR 240-2.075 and the Commission’s “Notice Explaining Process for Viewing Confidential Information” issued on July 15. 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. NRDC and its members are interested in promoting energy efficiency, peak demand reduction and renewable energy resources to meet Missouri’s energy needs. NRDC has been active in PSC dockets concerning the Missouri Energy Efficiency Investment Act, electric utility rate cases and IRPs, rulemakings, and working dockets on renewable energy, efficiency, electric vehicles and regulatory policy.

2. NRDC is a stakeholder with a longstanding interest promoting renewable generation and retiring coal-fired power plants. NRDC’s interests are different from those of the general public in their environmental emphasis. NRDC seeks to displace fossil-fueled electricity with energy efficiency and renewable energy in order to reduce

pollution and ameliorate the adverse effects of fossil energy on the climate.

3. NRDC seeks intervenor status in this non-contested case in order to view confidential information as permitted by the Commission's Notice of July 15. NRDC has legitimate need and use for such confidential access in order to evaluate the practices of Missouri's investor-owned utilities with regard to self-commitment and self-scheduling and to comment knowledgeably and make any recommendations it finds appropriate in light of the evidence.

4. 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
St. Louis, Missouri 63102
(314) 231-4181
(314) 231-4184 (facsimile)
hrobertson@greatriverslaw.org

5. NRDC is not yet certain of the position it will take in this case.

6. It will serve the public interest for the PSC to grant this application to intervene.

WHEREFORE, NRDC respectfully requests the Commission to:

- A. Grant the application to intervene; and
- B. Because time is short, expedite consideration of this motion and make the intervention effective immediately;

/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 16th day of July, 2019, to all counsel of record.

/s/ Henry B. Robertson
Henry B. Robertson