

BEFORE THE PUBLIC SERVICE COMMISSION
OF THE STATE OF MISSOURI

In the Matter of Union Electric Company d/b/a)
Ameren Missouri's 2023 Utility Resource Filing) File No. EO-2024-0020
Pursuant to 20 CSR 4240 - Chapter 22)

APPLICATION TO INTERVENE OF SIERRA CLUB

COMES NOW Sierra Club, and pursuant to 20 CSR 4240-2.075, applies to intervene in this proceeding. In support of its application, 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 roughly 700,000 members nationwide and more than 10,000 members in Missouri, many of whom reside in Ameren Missouri's service territory and are Ameren Missouri ratepayers.

2. All communications and pleadings in this case should be directed to:

Ethan Thompson
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3. Sierra Club exists for the purpose of preserving and protecting environmental values. Consistent with this mission, Sierra Club for many years has advocated for transitioning the electricity sector from coal-fired generation to cleaner and lower cost forms of energy, such as energy efficiency and renewable energy sources. Sierra Club's interest in protecting and enhancing the quality of ambient air and water throughout the state will be favorably affected if Ameren aggressively pursues renewable energy, energy efficiency, and demand response programs that displace fossil-fuel generation. Sierra Club is concerned with emissions of

greenhouse gases that cause climate change, and with pollution from non-renewable sources that cause a host of health issues including asthma, mercury poisoning, sudden infant death syndrome, and respiratory problems, among others.

4. Sierra Club has been a party to many previous Ameren matters before the Public Service Commission, including IRPs and IRP updates, as well as rate cases, fuel adjustment clause dockets, and MEEIA proceedings.

5. Sierra Club's interest in promoting cleaner and lower cost forms of energy is different from that of the general public and could be adversely affected by an order approving prolonged reliance on aging coal plants, inadequate levels of DSM programs, and a halting deployment of renewable generation. Moreover, Sierra Club's staff and consultants have unique and extensive experience in analyzing power plant economics. Sierra Club's intervention would serve the public interest in prudent resource planning, public health, and the curtailment of greenhouse gas emissions.

6. Sierra Club has not yet determined the positions it will take in this case.

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

Respectfully submitted,

/s/ Ethan Thompson
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CERTIFICATE OF SERVICE

The undersigned hereby certifies that a true and correct PDF version of the foregoing was filed on EFIS and sent by email to all counsel of record on this the 10th day of October 2023.

/s/ Ethan Thompson
Ethan Thompson