BEFORE THE PUBLIC SERVICE COMMISSION

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In the Matter of Union Electric Company d/b/a Ameren Missouri's 2023 Utility Resource Filing Pursuant to 20 CSR 4240 – Chapter 22

Case No. EO-2024-0020

<u>APPLICATION TO INTERVENE OF</u> <u>DUTCHTOWN SOUTH COMMUNITY CORPORATION</u>

COMES NOW Dutchtown South Community Corporation ("DSCC"), pursuant to 20 CSR 4240-2.075, and submits this application to intervene in this proceeding and become a party for all purposes. In support of its application, DSCC states:

1. DSCC is a nonprofit corporation organized under the laws of the State of

Missouri. The organization's offices are located at 4204 Virginia Avenue, St. Louis, Missouri

63111.

- 2. Communications, orders and decisions in this matter should be directed to the undersigned counsel at the mailing address, telephone number and email listed below.
 - 3. DSCC works to stabilize and improve the neighborhoods of Dutchtown, Mt.

Pleasant, Marine Villa and Gravois Park in southeast St. Louis City. The organization seeks to advance neighborhood vitality in these neighborhoods through community empowerment, housing stabilization and real estate development. Its Community Empowerment Committee is made up of nearly 90 stakeholders who live, work, own property or own businesses in these communities.

4. DSCC has a particular interest in combatting environmental racism and addressing the disparate impact coal-fired power generation has on persons of color generally and its constituents specifically. The organization is also interested in transitioning the electricity sector from coal-fired generation to cleaner and lower cost forms of energy for its constituents. DSCC seeks to spur investment in programs that will generate job opportunities for its constituents. DSCC seeks to increase the access its constituents have to renewable power opportunities such as community solar. In this way, DSCC has interests that are different from those of the general public or the average ratepayer, which could be adversely affected by the decision in this case.

5. DSCC does not yet have a position on the issues in this case and reserves the right to take positions on specific issues as this case proceeds.

6. It will serve the public interest for DSCC to be allowed to intervene.

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

/s/ Sarah W. Rubenstein Sarah Rubenstein (Mo. Bar No. 48874) Ethan Thompson (Mo Bar No. 74226) Great Rivers Environmental Law Center 319 N. Fourth Street, Suite 800 St. Louis, Missouri 63102 (314) 231-4181 (314) 231-4184 (facsimile) srubenstein@greatriverslaw.org ethompson@greatriverslaw.org

Attorneys for Dutchtown South Community Corporation

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing was filed on EFIS and sent by email on this 11th day of October, 2023, to all parties on the Commission's service list in this

case.

/s/Sarah W. Rubenstein