

BEFORE THE PUBLIC SERVICE COMMISSION
OF THE STATE OF MISSOURI

In the Matter of Ameren Missouri's Request for a Variance)
Regarding its Renewable Energy Standard Compliance.) Case No. EE-2020-0411

APPLICATION TO INTERVENE OF SIERRA CLUB

Come now Sierra Club, and pursuant to 4 CSR 240-2.075, applies to intervene herein. In support of its motion 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 750,000 members nationally and approximately 12,000 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 gretchen.waddellbarwick@sierraclub.org; telephone 314-644-1011. Sierra Club is concerned with the build-up of greenhouse gases that lead to global warming, and with pollution from non-renewable energy sources that can cause a host of health problems including asthma, mercury poisoning, sudden infant death syndrome, respiratory problems, and other issues. Sierra Club has been actively encouraging the use of energy efficiency and renewable energy sources.

2. 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

3. Sierra Club campaigned for the Renewable Energy Standard as Proposition C in 2008 and recently filed comments on Ameren's 2019 compliance report and plan in Case No. EO-2020-0328 raising concerns about enforcement of the RES and the possible use of invalid Renewable Energy Certificates (RECs). Ameren's request for a variance in this case is a response to those comments.

4. Movant's interests in this case are different from those of the general public and could be adversely affected by an order approving the variances sought by Ameren. As an initial matter, Sierra Club wants to know what Ameren knows and how it knows it concerning the RECs it purchases for its grudging compliance with the RES.

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

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 applicant

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 6th day of July, 2020, to all counsel of record.

/s/ Henry B. Robertson
Henry B. Robertson