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>HOMES FOR ALL ST. LOUIS</u>

COMES NOW Homes for All St. Louis ("Homes for All"), 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, Homes for All states:

 Homes for All is a nonprofit corporation organized under the laws of the State of Missouri. The organization's offices are located at 2748 Chippewa Street, St. Louis, Missouri 63118.

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. Homes for All works to improve housing quality and create a renter friendly environment by catalyzing tenant associations and advocating for fair, affordable and equitable housing.

4. Homes for All has a particular interest in transitioning the electricity sector from coal-fired generation to cleaner and lower cost forms of energy for its constituents. Homes for All seeks to spur investment in programs that will generate job opportunities for its constituents. Homes for All seeks to increase the access its constituents have to renewable power opportunities such as community solar and residential energy efficiency programs. In this way, Homes for All 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. Homes for All 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 Homes for All to be allowed to intervene.

WHEREFORE, Homes for All respectfully requests the Public Service Commission to grant this application to intervene.

<u>/s/ Sarah W. Rubenstein</u> 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 srubenstein@greatriverslaw.org ethompson@greatriverslaw.org

Attorneys for Homes for All St. Louis

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 18th day of October, 2023, to all parties on the Commission's service list in this case.

/s/Sarah W. Rubenstein