

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 NATURAL  
RESOURCES DEFENSE COUNCIL**

COMES NOW Natural Resources Defense Council (“NRDC”), and pursuant to 4 CSR 240-2.075, applies to intervene in this proceeding. In support of its application, 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. NRDC has more than 4,800 members in Missouri, many of whom are Ameren Missouri ratepayers. NRDC and its members are interested in promoting energy efficiency, peak demand reduction, and renewable energy resources to meet Missouri’s energy needs and to do so more cost-effectively than conventional fossil fuel and nuclear generation.

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

Ethan Thompson  
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St. Louis, MO 63102  
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3. NRDC has a longstanding interest in demand side management (“DSM”), the effectiveness of Ameren’s DSM programs, the customer benefits and utility costs resulting from DSM and distributed energy resources, and demand-side rates. NRDC also expects to see

progress made in the transition away from coal and in the direction of renewable resources, energy storage, beneficial electrification, power purchases, satisfaction of corporate and municipal clean energy goals, and distribution planning.

4. NRDC will bring significant expertise to this proceeding. NRDC has intervened and/or provided testimony on these issues in public utility commission proceedings in many states, including Missouri, Illinois, Ohio, Wisconsin, New York, Oregon, Iowa, New Jersey, and California. NRDC has regularly presented testimony before the US Congress and various state legislatures related to the electric utility industry's use of energy efficiency resources, rate design, utility planning, and other topics relevant to this proceeding.

5. NRDC's interests in effective DSM programs and in shifting from fossil fuels to renewable energy sources are different from those of the general public or average ratepayer and could be adversely affected by the decision in this case.

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

7. It will serve the public interest for NRDC to be allowed to intervene.

WHEREFORE, NRDC 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 26<sup>th</sup> day of October 2023.

/s/ Ethan Thompson  
Ethan Thompson