

**BEFORE THE PUBLIC SERVICE COMMISSION
OF THE STATE OF MISSOURI**

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

MOTION TO INTERVENE of CLEAN GRID ALLIANCE

Clean Grid Alliance, by its counsel, hereby petitions the Public Service Commission of the State of Missouri ("PSC" or "Commission") for an order permitting Clean Grid Alliance to intervene in this proceeding under 20 CSR 4240-2.075 as an interested entity. In support of this Motion to Intervene, Clean Grid Alliance states and alleges the following:

1. Clean Grid Alliance is a not-for-profit corporation organized and existing under the laws of the State of Minnesota. Clean Grid Alliance is a collaborative organization dedicated to renewable energy's fair access to the electric transmission system and market throughout the Midwest. Clean Grid Alliance's Board of Directors and members are comprised of wind, solar, and battery storage developers, environmental organizations, wind and solar energy experts, clean energy advocates, and businesses providing goods and services to the wind industry in Missouri and across the country. Members of Clean Grid Alliance operate and are seeking to build wind, solar, battery storage, and transmission facilities in Missouri and MISO, and have contracts to provide energy to utilities in Missouri. Union Electric d/b/a Ameren Missouri could potentially purchase energy from members of Clean Grid Alliance or they could build plants for Ameren Missouri to own and operate.

2. Clean Grid Alliance's office is located at 570 Asbury Street, Suite 201, St. Paul, MN 55104, with a phone number of 651-644-3400. Notice and mailings may be sent or electronically mailed to:

Sean R. Brady (IL Bar # 6271134)
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and

Judith Anne Willis (MO Bar# 63327)
The Law Office of Judith Anne Willis
P.O. Box 106088
Jefferson City, MO 65110
Telephone: 573-301-8082
Email: jaw@anniewillislaw.com

3. This motion is brought within the deadline to seek intervention established in the *Order Directing Notice and Setting Deadline for Intervention Requests* issued on September 27, 2023.
4. Clean Grid Alliance and its members will be directly impacted by the resource plan proposed by Ameren Missouri because the plan considers the extent to which Ameren Missouri should use wind, solar, battery storage and hybrid generating resources for its customers and the energy policies surrounding those decisions.
5. Clean Grid Alliance does not yet have a position on the proposals and analysis within the integrated resource plan and supporting testimony. Clean Grid Alliance reserves the right to take a position on specific issues as this case proceeds.
6. No other party or entity interested in this proceeding can adequately represent the interests of the Clean Grid Alliance because its interests differ from those of

the general public and other intervenors.

7. Clean Grid Alliance was granted intervention and fully participated in two prior cases regarding integrated resource planning: EO-2021-0021, and EO-2018-0038. In addition, CGA has been granted intervention in the following cases: EA-2014-0207, EA-2016-0358, EA-2017-0345, ET-2018-0063 and EA-2023-0017.
8. Clean Grid Alliance's intervention will serve the public interest by assisting the development of a full and complete record for the Commission's decision in this case.

Wherefore, Clean Grid Alliance seeks an order granting intervention and the opportunity to provide additional information that will serve the public interest.

Respectfully submitted,

/s/ Judith Anne Willis
Judith Anne Willis (MO Bar # 63327)

Judith Anne (Annie) Willis
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Attorney for Clean Grid Alliance

CERTIFICATE OF SERVICE

The undersigned certifies that this Motion was electronically served upon all parties to this case on October 30, 2023.

/s/ Judith Anne Willis _____

Attorney for Clean Grid Alliance