

**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 THE COUNCIL FOR THE NEW ENERGY ECONOMICS**

COMES NOW, The Council for New Energy Economics (“NEE”) and respectfully files this Application to Intervene with the Missouri Public Service Commission (“Commission”) in the above-referenced case pursuant to 20 CSR 4240-2.075. In support of its Application, NEE states as follows:

1. On July 28, 2023, Union Electric Company d/b/a Ameren Missouri (“Ameren”) filed its *Notice of Case Filing*, indicating its intent to file its Triennial Integrated Resource Plan (“IRP”). On September 26, 2023, Ameren filed its IRP with the Commission. Subsequently, the Commission issued its *Order Directing Notice and Setting Deadline for Intervention Requests*, which directed that requests to intervene must be submitted no later than October 30, 2023.

2. NEE is a non-profit organization committed to helping utilities and energy decision-makers navigate rapidly evolving utility industry economics using neutral data and analysis. NEE seeks intervention in this docket in order to provide analysis and engage in collaborative dialogue regarding the IRP filings submitted by Ameren.

3. NEE’s mission is to present policy, utility, and stakeholder energy decision-makers with complex utility system modeling analysis to help determine the most cost-effective path forward for the deployment of energy resources. NEE is a non-profit with deep regulatory experience and expertise from its Board of Directors, staff, and modeling

consultants.<sup>1</sup> NEE has engaged and is actively working with the Energy Futures Group, an expert energy resources modeling firm to provide complex, Missouri-specific analysis results.

4. The Commission may grant an application to intervene if “(A) The proposed intervenor or new member(s) has an interest which is different from that of the general public and which may be adversely affected by a final order arising from the case; *or* (B) Granting the proposed intervention would serve the public interest.”<sup>2</sup>

5. As an organization dedicated to educating decision-makers and promoting the cost-effective deployment of energy resources, NEE’s interest in presenting complex utility system modeling analysis is different than that of the general public and could be adversely affected by a Commission order in this case. NEE adopts a long-term stakeholder present value perspective, encouraging utilities and energy decision-makers to review comprehensive data in order to select the most economically beneficial resources to lower rates and costs, in ways that benefit all stakeholders, while maintaining grid reliability.

6. Additionally, NEE’s participation in this docket will further the public interest by adding a unique, neutral voice with a particular expertise in the economics of generation resource selection at a time when Ameren’s generation portfolio is at a crossroads. NEE’s presentation of data and analysis will be supplemental to the information presented by other stakeholders and will aid the Commission in evaluating Ameren’s IRP filings. NEE has previously established itself as a resource for detailed economic analysis and expert reporting in the Triennial IRP filings of Evergy Missouri West and Evergy

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<sup>1</sup> Additional information about NEE’s Board of Directors, staff and modeling consultants can be found on NEE’s website: <https://newenergyeconomics.org/about-us>.

<sup>2</sup> 20 CSR 4240-2.075(3) (emphasis added).

Missouri Metro (together “Evergy”),<sup>3</sup> as well as in Evergy’s 2022 and 2023 IRP Annual Update filings.<sup>4</sup> NEE’s insights in these proceedings helped to further develop the record for Commission consideration and promoted productive stakeholder dialogue.

7. NEE’s participation in these cases will not impair the orderly and prompt conduct of the proceedings. NEE is committed to a collaborative approach and seeks to make its analysis and information accessible to the benefit of all IRP stakeholders. NEE offers its perspective to the Commission and Missouri stakeholders because it understands the vital importance of making the right long-term energy investments and the significant challenges of doing so.

8. In addition to the undersigned, NEE requests service of all pleadings, orders, and other documents in the above referenced case on the following listed individual:

Dan Bruer  
Executive Director  
The Council for the New Energy Economics  
1390 Yellow Pine Ave  
Boulder, CO 80305  
dan.bruer@newenergyeconomics.org

9. At this time, NEE has not yet determined the specific positions it will take in this case.

WHEREFORE, NEE respectfully requests that the Commission grant its Application to Intervene. NEE also requests all other relief to which it is entitled.

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<sup>3</sup> Missouri Public Service Commission Case Nos. EO-2021-0035 and EO-2021-0036.

<sup>4</sup> Missouri Public Service Commission Case Nos. EO-2022-0201 and EO-2022-0202.

Respectfully submitted,

By: /s/ Alissa Greenwald

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ATTORNEY FOR THE COUNCIL FOR  
THE NEW ENERGY ECONOMICS

**CERTIFICATE OF SERVICE**

I hereby certify that a true and correct copy of the foregoing document was served upon all counsel of record by email, this October 30<sup>th</sup>, 2023.

/s/Alissa Greenwald

Alissa Greenwald