

BEFORE THE PUBLIC SERVICE COMMISSION  
OF THE STATE OF MISSOURI

In the Matter of the Application of Union                                    )  
Electric Company d/b/a Ameren Missouri                                    )       **File No. ET-2018-0132**  
for Approval of Efficient Electrification Program.                                    )

**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 600,000 members nationally and over 11,000 members in Missouri, many of whom reside in the service territory of Union Electric Company d/b/a Ameren Missouri (“Ameren”) and are Ameren ratepayers. The Missouri Chapter of Sierra Club has an office at 2818 Sutton Blvd, St. Louis, MO 63143; email john.hickey@sierraclub.org; telephone 314-644-1011.

2.       Sierra Club exists for the purpose of preserving and protecting environmental values, and for years has been actively concerned with protecting air and water quality throughout the state of Missouri. Sierra Club’s interest in protecting and enhancing the quality of ambient air and water throughout the state will be favorably affected if Ameren acts to displace its fossil fuel generation through renewable energy, energy efficiency and demand response programs, and acts to support widespread transportation electrification through programs designed to lower barriers to electric vehicle adoption. Sierra Club is concerned with the build-up of greenhouse gases that lead to climate change, and with pollution from non-renewable fossil fuel sources that

can result in a host of health problems including asthma, mercury poisoning, sudden infant death syndrome, and respiratory, cardiovascular, and reproductive harms. To limit these climate and public health impacts, Sierra Club actively supports the increased use of renewable generating resources, increased energy efficiency, and the acceleration of transportation electrification, among other measures.

3. Sierra Club seeks to intervene in this proceeding because of its strong interest in addressing the barriers to the adoption of electric vehicles (“EVs”) in Missouri, including access to charging infrastructure, in a manner that will maximize benefits for the electricity grid, electricity ratepayers and the environment. Not only do EVs lack the dangerous tailpipe emissions that can lead to the negative health impacts identified above, but transportation electrification has the potential to benefit the electricity grid by improving its efficiency, reliability and flexibility, including by facilitating the integration of renewable generating resources.

4. Movants have substantial knowledge and experience in the complex issues related to transportation electrification and the role for electric utilities. Before this Commission, Sierra Club participated in File No. EW-2016-0123, the Commission’s *Working Case Regarding Electric Vehicle Charging Facilities*, and provided extensive comments on the legal, technical, and policy issues related to EV charging. Sierra Club also actively participated in: File No. ET-2016-0246, *In the Matter of the Application of Union Electric Company d/b/a Ameren Missouri for Approval Of a Tariff Setting a Rate for Electric Vehicle*; File No. ER-2016-0285, *In the Matter of Kansas City Power & Light Company’s Request for Authority to Implement a General Rate Increase for Electric*

*Service* (raising the issue of cost recovery for KCP&L's Clean Charge Network); and EW-2017-0245, the Commission's *Working Case to Explore Emerging Issues in Utility Regulation*. Sierra Club has also participated in dockets regarding utility electric vehicle charging infrastructure proposals in states across the country, including, but not limited to: Utah, Ohio, Nevada, New York, Minnesota, Michigan, Massachusetts, Connecticut and California.

5. 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](mailto:hrobertson@greatriverslaw.org)

6. Movant's interests focus on environmental protection and hence are different from those of the general public and could be adversely affected by the Commission's order in this case.

7. Sierra Club supports widespread transportation electrification and is generally supportive of utility-driven efforts to advance that goal, but is not yet certain of the position it will take in this case.

8. It will serve the public interest for the Public Service Commission to grant this application to intervene.

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

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**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 14th day of March, 2018, to all counsel of record:

/s/ Henry B. Robertson  
Henry B. Robertson

**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 14<sup>th</sup> day of March, 2018, to all counsel of record:

/s/ Henry B. Robertson  
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