

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

In the Matter of the Petition of Union Electric            )  
Company d/b/a Ameren Missouri for a                    )  
Financing Order Authorizing the Issue of            )        File No. EF-2024-0021  
Securitized Utility Tariff Bonds for Energy         )  
Transitions Costs related to Rush Island            )  
Energy Center    )

**MOTION TO INTERVENE OF NATURAL RESOURCES DEFENSE COUNCIL**

COMES NOW the Natural Resources Defense Council (“NRDC”), pursuant to the Commission’s November 22, 2023 Order Giving Notice, Setting a Deadline to Intervene, and Directing a Proposed Procedural Schedule, and 20 CSR 4240-2.075, and for its Motion to Intervene, states as follows:

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 ratepayers. NRDC and its members are interested in promoting energy efficiency, peak demand reduction, and efficiency-friendly rate designs to meet Missouri’s energy needs and to do so more cost-effectively than conventional fossil fuel and nuclear generation.

2. NRDC has a strong interest in the retirement of coal plants in Missouri and replacing them with cleaner low-carbon resources and do so while meeting reliability goals. At this point NRDC does not know what position it will take on the issues in this case.

3. NRDC will bring significant expertise to this proceeding. The Staff of NRDC has extensive history with securitization, renewable generation, transmission, and the design and implementation of utility programs and policies designed to deploy energy efficiency and peak demand reduction to benefit the public. NRDC has intervened and/or provided testimony on

these issues in public utility commission proceedings in many states, including Illinois, Ohio, Michigan, Kansas, Colorado, Wisconsin, New York, Oregon, Iowa, New Jersey and California. NRDC has regularly presented testimony before the U.S. 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.

4. Correspondence, communications, orders and decisions may be sent to the undersigned legal counsel.

5. NRDC has environmental interests different from those of the general public or the average ratepayer, which could be adversely affected by the decision in this case.

6. It will serve the public interest for the Commission to grant this motion to intervene.

7. Correspondence, communications, orders and decisions may be sent to:

Sarah Rubenstein (MO Bar #48874)  
Great Rivers Environmental Law Center  
319 N. Fourth Street, Suite 800  
St. Louis, Missouri 63102  
(314) 231-4181  
[srubenstein@greatriverslaw.org](mailto:srubenstein@greatriverslaw.org)

WHEREFORE, NRDC respectfully requests the Public Service Commission grant this Motion to Intervene.

Respectfully Submitted,

*/s/ Sarah Rubenstein*

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*Counsel for Natural Resources Defense Council*

**CERTIFICATE OF SERVICE**

I hereby certify that on this 5<sup>th</sup> day of December, 2023, a true and correct copy of the foregoing pleading was filed on EFIS and sent by email to all counsel of record.

*/s/ Sarah Rubenstein*

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Sarah Rubenstein