

**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 SIERRA CLUB

COMES NOW Sierra Club, 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. Sierra Club is a nonprofit organization organized and existing under the nonprofit corporation laws of the state of California. Sierra Club has roughly 700,000 members nationwide and more than 10,000 members in Missouri, many of whom reside in Ameren Missouri’s service territory and are Ameren Missouri ratepayers.

2. Sierra Club exists for the purpose of preserving and protecting environmental values. Sierra Club is concerned with emissions of greenhouse gases that cause climate change, and with pollution from non-renewable sources that cause a host of health issues including asthma, mercury poisoning, sudden infant death syndrome, and respiratory problems, among others. Consistent with this mission, Sierra Club has long advocated for transitioning the electricity sector from coal-fired generation to cleaner and lower cost forms of energy in general, and, more specifically, for retiring Ameren’s coal generation plants such as Rush Island. Sierra Club’s interest in protecting and enhancing the quality of ambient air and water throughout the state will be favorably affected the sooner Ameren retires its Rush Island coal plant.

3. Sierra Club has been a party to many previous Ameren matters before the Public Service Commission, including IRPs and IRP updates, as well as rate cases, fuel adjustment clause dockets, and MEEIA proceedings.

4. Sierra Club provides a unique perspective, as its interests in protecting the environment and transitioning the electricity sector away from coal-fired generation and promoting renewable forms of energy are different from those of the general public. Sierra Club's interests would be positively affected by the retirement of Ameren's Rush Island coal plant.

5. While Sierra Club supports the retirement of Ameren's Rush Island coal plant, Sierra Club is not yet certain of the positions it will take 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

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

Respectfully Submitted,

/s/ Sarah Rubenstein

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Counsel for Sierra Club

CERTIFICATE OF SERVICE

I hereby certify that on this 11th day of December, 2023, a true and correct copy of the foregoing pleading was filed on EFIS and sent by email to all parties of record.

/s/ Sarah Rubenstein

Sarah Rubenstein