

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

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|--|---|----------------------|
| In the matter of the Petition of Union |) | |
| Electric Company d/b/a Ameren Missouri |) | |
| for a Financing Order Authorizing the |) | Case No EF-2024-0021 |
| Issuance of Securitized Utility Tariff Bonds |) | |
| For Energy Transaction Costs related to Rush |) | |
| Island Energy Center |) | |

RESPONSE OF MARK EDWARD KREBS

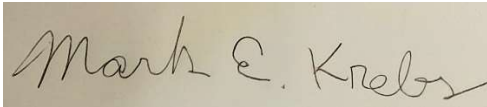
COMES NOW Mark Edward Krebs (Krebs) and for his Response to Ameren Missouri's Opposition to his Motion to Intervene, states as follows:

I. In its Response, Ameren Missouri argues that Krebs should not be permitted to intervene because he has an interest that is no different than the general public. Ameren Missouri further asserts that this means the Commission must deny intervention unless it finds that such intervention would be in the public interest which Ameren Missouri argues, without explanation, it would not be.

2. Contrary to Ameren Missouri's assertion, Krebs has an interest that is markedly different from the general public. He has for decades argued against efforts to obliterate natural gas and coal as a fuel source for energy production, pointing to the reliability and cost issues raised by a too heavy reliance on renewables. (See Exhibit A for his list of publications in which his comments have appeared). In doing so, Krebs is really no different than those environmental groups, like the Sierra Club and the Environmental Defense Fund, except for the relatively unlimited financial resources to assert their anti-natural gas and anti-coal positions in any legal or regulatory arena where such issues can be raised, and for the fact that Krebs actually lives in Ameren Missouri's service territory.

3. In this instance, Ameren Missouri's ratepayers may be forced to spend upwards of \$7 Billion (or more) on renewables in order to avoid approximately \$1 Billion in scrubbers, and to face the inherent reliability concerns associated with a permanent scrapping of its Rush Island Energy Center in favor of unreliable renewables plus batteries. Krebs respectfully suggests that the stakes are too high and too permanent for the issues to be decided without any countervailing input, which is exactly what Mr. Krebs would bring to this proceeding.

Respectfully submitted,

A rectangular area containing a handwritten signature in black ink on a light-colored background. The signature reads "Mark E. Krebs" in a cursive script.

Mark Krebs

Attachments (1 on following page)

Exhibit A: [List of Publications](#)

Category Archives: Krebs, Mark

[“Wartime” Climate Policy vs. Natural Gas: Biden Gets Desperate](#)

[Review of Proposed Minimum Efficiency Standards for “Consumer Boilers”](#)

[Update: DOE Appliance Minimum Efficiency Standards](#)

[Did DOE “flip the bird” to the DC Circuit?](#)

[Energy Appliance Victory! \(DC Circuit vs. DOE\)](#)

[DOE vs. Gas Cooking: A Review of Critical Comments](#)

[The White House State: ‘Regulatory Reform’ in Sheep’s Clothing \(OMB Circular A-4\)](#)

[Gas Stoves: The Beloved Blue Flame is Just Better](#)

[Dangerous ‘Deep Decarbonization’ \(Krebs PowerPoint to Cooler Heads Coalition\)](#)

[“Rare Earths,” Electrification Mandates, and Energy Security \(Part II\)](#)

[“Rare Earths,” Electrification Mandates, and Energy Security \(Part I\)](#)

[Gas Furnaces and Big Brother Revisited](#)

[Gas Furnaces: Big Brother Says No](#)

[Environmentalists Petition EPA to Ban Natural Gas Use in Buildings](#)

[All-Electric Forcing in the “Inflation Reduction Act” \(up to \\$14,000 per home\)](#)

[The Department of Energy’s Intent to Eliminate Non-condensing Furnaces](#)

[‘The \\$287 Million Pipeline No One Needed’: Deconstructing an Anti-Natural Gas Argument](#)

[Energy Efficiency under Biden’s DOE: An Update](#)

[Mark Krebs on Energy Efficiency under Biden’s DOE \(Part IV of IV: More Issues\)](#)

[Mark Krebs on Energy Efficiency under Biden’s DOE \(Part III of IV: Biden’s Bias\)](#)

[Mark Krebs on Energy Efficiency under Biden’s DOE \(Part II of IV: EERE Modeling\)](#)

[Mark Krebs on Energy Efficiency under Biden’s DOE \(Part I of IV: “Deep Decarbonization” Reigns\)](#)

[Gas Furnaces vs. DOE’s EERE \(Trump trumps Obama, but Biden is Next\)](#)

[Energy Efficiency Policy Under Trump \(Part III: Litigation\)](#)

[Energy Efficiency Policy Under Trump \(Part II: EERE’s Process Rule & Overhaul\)](#)

[Energy Efficiency Policy Under Trump \(Part I: A Mixed Bag in the Swamp\)](#)

[Gas Industry to DOE: Don't Ban Non-condensing Gas Appliances](#)

[Stimulus IV: Last Chance for the Green New Deal?](#)

[Problems of Industrial Electrification \(forced decarbonization on the firing line\)](#)

[EERE Reform: Brouillette's Turn \('deep decarbonization' threat still alive\)](#)

[DOE Revisits Forced Electrification \(Decarbonization\) Rules re Non-condensing Furnaces, Water Heaters](#)

[Costing the Green New Deal and "Deep Decarbonization": Some Clarifications](#)

[Hearing Summary: "Wasted Energy: DOE's Inaction on Efficiency Standards & Its Impact on Consumers and the Climate"](#)

[Dear EERE: Past Time to Debate "Deep Decarbonization" \(Obama program inconsistent with America First energy policy\)](#)

[Behind the IPCC Curtain: the Costs of Climate Mitigation Policy](#)

[Paris Lives! "Deep Decarbonization" at DOE](#)

[Estimating Costs of Deep Decarbonization \(California and beyond\)](#)

[Update: 'Is DOE Leading Us Astray?' \(A 1999 analysis revisited\)](#)

[Warring Against Natural Gas: Joint EEI/NRDC Statement to NARUC \(crony environmentalism at work\)](#)

[Secretary Perry's Hearing \(Part II\)](#)

[The "Powering America" Hearings \(Part I\)](#)

[Direct Use of Natural Gas: Unshackle Efficiency from Obama's 'Deep Decarbonization' \(Part II\)](#)

[Direct Use of Natural Gas: Unshackle Efficiency from Obama's 'Deep Decarbonization' \(Part I\)](#)

[DOE's EERE: Reform Ideas for Secretary Perry](#)

[Federal Energy Efficiency Mandates: DOE's End Run vs. the Public Interest \(Part II\)](#)

[Federal Energy Efficiency Mandates: DOE's End Run vs. the Public Interest \(Part I\)](#)

[Direct-Use Natural Gas Needs a Free Market Too \('deep decarbonization' easy target for elimination in new policy era\)](#)

['Home Appliance Energy Efficiency Standards' Hearing: Some Reflections \(Part II\)](#)

['Home Appliance Energy Efficiency Standards' Hearing: Some Reflections \(Part I\)](#)

[Mark Krebs: Digging Down on Energy Efficiency Claims \(an interview\)](#)

[The Regulatory Assistance Project \(RAP\): Warring Against Gas](#)

[“Grid-Enabled” Water Heating: “Deep Decarbonization” as Crony Environmentalism \(Part II\)](#)

[“Grid-Enabled” Water Heating: “Deep Decarbonization” as Crony Environmentalism \(Part I\)](#)

[Gas Furnace Rule Part II: Return of the “Scorched Gas” Policy](#)

[Energy Mischief at the Rural Utilities Services \(USDA\): Climate Hubs, Efficiency Mandates, Fuel Switching Rules](#)

[Gas Furnace Rule: Beware of “Scorched Gas” Policy](#)

Miscellaneous

- In Addition to MasterResource, Krebs articles have been published on [Real Clear Energy](#) and [Watts Up With That?](#) “The world's most viewed site on global warming and climate change.”
- Krebs also has submitted scores of comments to Regulations.gov while employed by Spire and its predecessors.
- Krebs has also provided testimony and discovery responses to the Missouri PSC on numerous occasions while employed by Spire and its predecessors.

In summary, Mr. Mark Krebs is a recognized subject matter expert in his field of energy policy analysis.