

BEFORE THE PUBLIC SERVICE COMMISSION
OF THE STATE OF MISSOURI

In re: Union Electric Company's 2018)	
Utility Resource Filing Pursuant to)	Case No. ER-2018-0038
4 CSR 240 – Chapter 22)	

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

Comes now the Natural Resources Defense Council (NRDC) and, pursuant to 4 CSR 240-2.075, applies to intervene herein and become a party for all purposes in respect to Ameren Missouri's 2017 triennial IRP filing.

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; contact Ashok Gupta at that address or at 212-243-4351. 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 and renewable energy resources to meet Missouri's energy needs.

2. At this point NRDC does not know what position it will take on the issues in this case.

3. NRDC was a party to Ameren Missouri in MEEIA cases EO-2012-0142 and EO-2015-0055; to Ameren rate cases ER-2010-0036, ER-2011-0028, ER-2014-0258 and ER-2016-0179; and Ameren IRP cases EO-2011-0271 and EO-2014-0084. It is also a member of Ameren's stakeholder advisory group for demand-side management.

4. NRDC will bring significant expertise to this proceeding. The Staff of

NRDC has extensive history with the design and implementation of utility programs and policies designed to deploy energy efficiency and cost-effective renewable resources 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, Wisconsin, New York, Oregon, Iowa, New Jersey and California. NRDC has regularly presented testimony before the US 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.

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

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

7. It will serve the public interest for NRDC to be allowed to intervene.

WHEREFORE, NRDC respectfully requests the Public Service Commission to grant this application to intervene.

/s/ Henry B. Robertson
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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 13th day of October, 2017, to all counsel of record.

/s/Henry B. Robertson
Henry B. Robertson