

from coal- and gas-burning generation to cleaner and lower cost forms of energy, such as energy efficiency, renewable energy sources, and energy storage. Sierra Club's interest in protecting and enhancing the quality of ambient air and water throughout the state will be favorably affected if Ameren Missouri aggressively pursues renewable energy, energy efficiency, and demand response programs that displace uneconomic fossil fuel generation. Sierra Club is concerned with emissions of greenhouse gases that cause climate change, and with pollution from coal and gas that cause a host of health problems including asthma, mercury poisoning, sudden infant death syndrome, respiratory problems, and other problems.

4. Sierra Club has been a party to numerous Ameren Missouri general rate cases, as well as integrated resource planning, energy efficiency, vehicle electrification, and other proceedings.

5. Sierra Club's interest in promoting cleaner and lower-cost forms of energy is different from that of the general public and could be adversely affected by an order approving rate designs or a revenue requirement that disincentivize energy efficiency, discourage renewable generation, or prolong reliance on aging coal-burning power plants. Sierra Club's intervention would serve the public interest in promoting prudent resource planning, public health, and the reduction of greenhouse gas emissions.

6. Sierra Club has not yet determined the positions it will take in this matter because discovery is necessary to help form such positions. Accordingly, Sierra Club expects to conduct and analyze discovery, after which it will decide whether to submit testimony that will articulate its position(s) on discrete issues.

7. Correspondence, communications, orders and decisions in this case 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 Application to Intervene.

Respectfully Submitted,

/s/ Sarah Rubenstein

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

Counsel for Sierra Club

CERTIFICATE OF SERVICE

I hereby certify that on this 12th day of July, 2024, 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