BEFORE THE PUBLIC SERVICE COMMISSION OF THE STATE OF MISSOURI

In the Matter of Union Electric Company d/b/a Ameren Missouri's Tariffs to Adjust Its Revenues for Electric Service

Case No. ER-2024-0319

SIERRA CLUB'S APPLICATION TO INTERVENE

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COMES NOW Sierra Club, pursuant to the Commission's July 1, 2024 Order Giving Notice, Setting a Deadline to Intervene, Setting a Deadline to Respond to the Test Year, and Directing a Proposed Schedule, and 20 CSR 4240-2.075, and for its Application 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 650,000 members nationwide and more than 9,500 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- 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.

3. Sierra Club for many years has advocated for transitioning the electricity sector

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.

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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.

<u>/s/ Sarah Rubenstein</u> Sarah Rubenstein