

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

In the Matter of the Application of Ameren                    )  
Transmission Company of Illinois for a                    )  
Certificate of Convenience and Necessity                )  
Under Section 393.170.01, RSMo Relating                )  
To Transmission Investments in Northwest                )  
And Northeast Missouri                                        )

Case No. EA-2024-0302

**SIERRA CLUB’S APPLICATION TO INTERVENE**

COMES NOW Sierra Club, pursuant to the Commission’s July 18, 2024 Order Directing Notice, Setting Intervention Deadline, and Directing Staff Recommendation, 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 approximately 9,500 members in Missouri, many of whom reside in the parts of Missouri that are in the MISO footprint and are electric customers of a distribution utility, such as Ameren Missouri.

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. Further, Sierra Club supports the construction of properly sited long-distance transmission as being necessary to robust deployment of renewable generation. Sierra Club’s interest in protecting and enhancing

the quality of ambient air and water throughout the state will be favorably affected if long-distance transmission is constructed that allows Missouri utilities to aggressively pursue renewable energy that displaces uneconomic fossil fuel generation.

3. Sierra Club has been a party to numerous Missouri general rate cases, as well as integrated resource planning, energy efficiency, vehicle electrification, and other regulatory proceedings. Sierra Club also participated in the CCN proceedings for the Grain Belt Express transmission line.

4. 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 inhibiting the construction of long-distance transmission that would discourage renewable generation. Sierra Club's intervention would serve the public interest in promoting prudent resource planning, public health, and the reduction of greenhouse gas emissions.

5. 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.

6. 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  
[rubenstein@greatriverslaw.org](mailto:rubenstein@greatriverslaw.org)

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

Respectfully Submitted,

*/s/ Sarah Rubenstein*

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*Counsel for Sierra Club*

**CERTIFICATE OF SERVICE**

I hereby certify that on this 14<sup>th</sup> day of August, 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*

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Sarah Rubenstein