

BEFORE THE PUBLIC SERVICE COMMISSION
OF THE STATE OF MISSOURI

In The Matter of Union Electric Company d/b/a)
Ameren Missouri's 2020 Utility Resource)
Filing Pursuant to 20 CSR 4240 – Chapter 22)

File No. EO-2021-0021

APPLICATION TO INTERVENE OF SIERRA CLUB

Comes now Sierra Club, and pursuant to 4 CSR 240-2.075, applies to intervene herein. In support of its motion to intervene, Sierra Club states the following.

1. Sierra Club is a nonprofit organization organized and existing under the nonprofit corporation laws of the state of California. Sierra Club has more than 800,000 members nationally and more than 12,000 members in Missouri, many of whom reside in Ameren Missouri's service territory and are Ameren ratepayers. The Missouri Chapter of Sierra Club has an office at 2818 Sutton Blvd., St. Louis, MO 63143; email Gretchen.waddellbarwick@sierraclub.org; telephone 314-644-1011. Sierra Club exists for the purpose of preserving and protecting environmental values. Consistent with this mission, Sierra Club for many years has advocated for transitioning the electricity sector from coal-fired generation to cleaner and lower cost forms of energy, such as energy efficiency and renewable energy sources. Sierra Club's interest in protecting and enhancing the quality of ambient air and water throughout the state will be favorably affected if Ameren aggressively pursues renewable energy, energy efficiency, and demand response programs that displace fossil fuel generation. 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 problems including asthma, mercury

poisoning, sudden infant death syndrome, respiratory problems, and other problems.

2. Sierra Club has been a party to many Ameren triennial IRP and IRP update, MEEIA, and rate cases.

3. Sierra Club's interest in promoting cleaner and lower cost forms of energy is different from those of the general public and could be adversely affected by an order approving prolonged reliance on aging coal plants, inadequate levels of DSM programs, and continued discouragement of renewable generation. Moreover, Sierra Club's staff and consultants have unique and extensive experience in analyzing the feasibility and cost-effectiveness of coal and its alternatives. Sierra Club's intervention would serve the public interest in prudent resource planning, public health, and the curtailment of greenhouse gas emissions.

4. Sierra Club has not yet determined the positions it will take in this case.

5. It will serve the public interest for the PSC to grant this application to intervene.

WHEREFORE, Sierra Club respectfully requests the Public Service Commission to grant the application to intervene.

/s/ Henry B. Robertson
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Attorney for Sierra Club

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 7th day of October, 2020, to all counsel of record.

/s/ Henry B. Robertson
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