

BEFORE THE PUBLIC SERVICE COMMISSION  
OF THE STATE OF MISSOURI

In the Matter of an Investigation of Missouri	)	
Jurisdictional Generator Self-Commitments into	)	File No. EW-2019-0370
SPP and MISO Day-Ahead Energy Markets	)	

**SIERRA CLUB’S MOTION TO INTERVENE AND REQUEST FOR  
EXPEDITED CONSIDERATION**

Comes now Sierra Club and applies to intervene pursuant to 4 CSR 240-2.075 and the Commission’s “Notice Explaining Process for Viewing Confidential Information” issued on July 15. 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 750,000 members nationally and over 11,000 members in Missouri. The Missouri Chapter of the Club has an office at 2818 Sutton Blvd, St. Louis, MO 63143; email [john.hickey@sierraclub.org](mailto:john.hickey@sierraclub.org); telephone 314-644-1011. Sierra Club exists for the purposes of preserving and protecting environmental values. Consistent with this mission, Sierra Club has long advocated for investment in low-cost, renewable energy resources in the state of Missouri and across the country. Sierra Club is interested in promoting renewable energy as an alternative to fossil fuel generation.

2. Sierra Club is a stakeholder with a longstanding interest promoting renewable generation and retiring coal-fired power plants. Sierra Club’s interests are different from those of the general public in their environmental emphasis. Sierra Club seeks to move away from fossil-fueled electricity to energy efficiency and renewable

energy in order to reduce pollution and ameliorate the adverse effects of fossil energy on the climate.

3. Sierra Club seeks intervenor status in this non-contested case in order to view confidential information as permitted by the Commission's Notice of July 15. Sierra Club has legitimate need and use for such confidential access in order to evaluate the practices of Missouri's investor-owned utilities with regard to self-commitment and self-scheduling and to comment knowledgeably and make any recommendations it finds appropriate in light of the evidence.

4. Correspondence, communications, orders and decisions may be sent to:

Henry B. Robertson (Mo. Bar No. 29502)  
Great Rivers Environmental Law Center  
319 N. Fourth Street, Suite 800  
St. Louis, Missouri 63102  
(314) 231-4181  
(314) 231-4184 (facsimile)  
[hrobertson@greatriverslaw.org](mailto:hrobertson@greatriverslaw.org)

5. Sierra Club is not yet certain of the position it will take in this case.

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

WHEREFORE, Sierra Club respectfully requests the Commission to:

- A. Grant Sierra Club's application to intervene expeditiously; and
- B. Extend the existing comment deadlines, or create new ones, in accordance with Sierra Club's Motion to Extend Certain Comment Deadlines and Establish a Process to Review Confidential Information, filed on July 15, 2019.

/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 16th day of July, 2019, to all counsel of record.

/s/ Henry B. Robertson  
Henry B. Robertson