

BEFORE THE PUBLIC SERVICE COMMISSION  
OF THE STATE OF MISSOURI

In the Matter of the Application of Union Electric )  
Company d/b/a Ameren Missouri for Approval of ) **File No. ET-2018-0063**  
2017 Green Tariff ) Tariff No. YE-2018-0064

**APPLICATION TO INTERVENE OF NRDC**

Comes now the Natural Resources Defense Council (“NRDC”), and pursuant to 4 CSR 240-2.075, applies to intervene herein. In support of its motion to intervene, NRDC states the following.

1. On November 27, 2017, Ameren Missouri filed its application for approval of a “green tariff” and for accounting authority. The Commission set an intervention deadline of December 11.

2. NRDC is a nonprofit corporation organized under the laws of New York with a Midwest office at 20 North Wacker Drive, Suite 1600, Chicago, IL 60606; contact Ashok Gupta at that address or at 212-243-4351. It has over 4,800 members in Missouri, many of whom are Ameren ratepayers. NRDC and its members are interested in promoting energy efficiency, peak demand reduction and renewable energy resources to meet Missouri’s energy needs and to do so more cost-effectively than conventional fossil-fuel and nuclear generation. NRDC will bring significant expertise to this proceeding. The Staff of NRDC has extensive history with the design and implementation of utility programs and policies designed to deploy renewable energy generation. NRDC has intervened and/or provided testimony on these issues in public utility commission proceedings in many states, including Missouri, Illinois, Michigan, Ohio, Wisconsin,

New York, Oregon, Iowa, New Jersey and California. NRDC has regularly presented testimony before the US Congress and various state legislatures related to the electric utility industry's use of renewable resources.

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

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4. NRDC's interests in low-cost, clean energy generation and environmental protection are distinct from those of the public at large and may be adversely affected by the outcome of this case. NRDC is uniquely situated to represent the interests of its members in this proceeding as a result of its expertise and experience in energy policy and law, and environmental regulations that affect the market for energy generation.

5. NRDC is not yet certain of the position it will take in this case. NRDC is supportive of the concept of a green tariff, but the devil may lurk in the details.

6. For the foregoing reasons, it will serve the public interest for the PSC to grant this application to intervene.

WHEREFORE, the Natural Resources Defense Council respectfully requests the Public Service Commission to grant the application to intervene.

/s/ Henry B. Robertson  
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Attorney for applicant

**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 8th day of December, 2017, to all counsel of record:

/s/ Henry B. Robertson  
Henry B. Robertson