BEFORE THE PUBLIC SERVICE COMMISSION OF THE STATE OF MISSOURI

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In the Matter of the Application of Union Electric Company d/b/a Ameren Missouri for Approval of 2017 Green Tariff

Case No. ET-2018-0063

MOTION TO INTERVENE of WIND ON THE WIRES

COMES NOW Wind on the Wires, by counsel, and hereby petitions the Public Service Commission of the State of Missouri ("PSC" or "Commission") for an order permitting the Wind on the Wires to intervene in this proceeding under 4 CSR 240-2.075 as an interested entity. In support of this Motion to Intervene, Wind on the Wires states and alleges the following:

1. Wind on the Wires is a not-for-profit corporation organized and existing under the laws of the State of Minnesota. Wind on the Wires is a collaborative organization dedicated to renewable energy's fair access to the electric transmission system and market throughout the Midwest. Wind on the Wires' Board of Directors and members are comprised of wind and solar developers, environmental organizations, wind energy experts, tribal representatives, clean energy advocates, and businesses providing goods and services to the wind industry in Missouri and across the country. Members of Wind on the Wires operate wind facilities in Missouri and MISO and Union Electric d/b/a Ameren Missouri could potentially purchase wind energy from members of Wind on the Wires as part of the tariff program that is the subject of this case. Wind on the Wires is located at 570 Asbury Street, Suite 201, St. Paul, MN 55104. Notice and mailings may be sent to: Sean R. Brady Senior Counsel and Regional Policy Manager - East Wind on the Wires P.O. Box 4072 Wheaton, IL 60189-4072 Telephone: 312-867-0609 Email: sbrady@windonthewires.org

and

Deirdre Kay Hirner (MO Bar # 66724) Midwest Director American Wind Energy Association 2603 Huntleigh Place Jefferson City, MO 65109 Telephone: 202-412-0130 Email: <u>dhirner@awea.org</u>

- This motion is brought within the deadline to seek intervention established in the Commission's Order Directing Notice, Setting Intervention Deadline issued on November 27, 2017.
- 3. Wind on the Wires do not yet have a position on the proposals and analysis within the tariff filing and supporting testimony. Wind on the Wires reserves the right to take a position on specific issues as this case proceeds.
- 4. No other party or entity interested in this proceeding can adequately represent the interests of the Wind on the Wires because their interest differs from those of the general public and other intervenors.
- 5. Wind on the Wires intervention will serve the public interest by assisting the development of a full and complete record for the PSC's decision in this case.

Wherefore, Wind on the Wires seek an order granting intervention and the opportunity

to provide additional information which will serve the public interest.

Respectfully submitted,

<u>/s/ Deirdre K. Hirner</u> Deirdre Kay Hirner (MO Bar # 66724) American Wind Energy Association Midwest Director 2603 Huntleigh Place Jefferson City, MO 65109 Telephone: 202-412-0130 Email: <u>dhirner@awea.org</u>

Attorney for Wind on the Wires

CERTIFICATE OF SERVICE

The undersigned certifies that this Motion was electronically served upon all parties to this case on December 11, 2017.

/s/ Deirdre K. Hirner

Attorney for Wind on the Wires