BEFORE THE PUBLIC SERVICE COMMISSION OF THE STATE OF MISSOURI

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In the Matter of the 2017 Integrated Resource Plan Annual Update for Union Electric Company d/b/a Ameren Missouri (Ameren Missouri)

File No. EO-2018-0038

APPLICATION TO INTERVENE OF RENEW MISSOURI

COMES NOW, Renew Missouri Advocates ("Renew Missouri"), pursuant to Missouri

Public Service Commission rule 4 CSR 240-2.075 and the Commission's September 25, 2017,

Order Directing Notice and Setting Deadline for Intervention, and applies to intervene in the

above-styled case. In support of its Application, Renew Missouri states:

1. Renew Missouri is a non-profit corporation organized under the laws of Missouri with its principal place of business within Missouri. Renew Missouri Advocates is a registered name under § 417.200 RSMo., with its principal place of business at 409 Vandiver West, Building 5, Suite 205, Columbia, MO 65202. Renew Missouri is a clean energy policy and advocacy group whose mission is to transform Missouri into a leading state in renewable energy and energy efficiency.

2. Pleadings, notices and other correspondence in this case should be directed to:

Andrew J. Linhares Renew Missouri Advocates 409 Vandiver Dr, Building 5, Suite 205 Columbia, MO 65205 T: (314) 471-9973 F: (314) 558-8450 Andrew@renewmo.org

3. On August 1, 2017, Union Electric Company d/b/a Ameren Missouri ("Ameren Missouri") filed its "Notice of Case Filing" concerning its triennial "Integrated Resource Plan."

4. On September 25, 2017Ameren Missouri filed its 2017 Integrated Resource Plan materials on its website and in the above-styled case.

5. Renew Missouri has an interest in Ameren Missouri's planned investments in Demand-Side Management (also referred to as energy efficiency) programs, as well as the Company's renewable energy portfolio and planned future investments in renewable generation. As statewide advocates for energy efficiency and renewable energy policy, Renew Missouri has interests that are distinct from those of the general public, and thus Renew Missouri and its mission may be adversely affected by a final order arising from this case.

6. Granting Renew Missouri intervention will serve the public interest by assisting the Commission's record for decisions in this case, and no party will be adversely affected by such intervention.

WHEREFORE, Renew Missouri submits this Application to Intervene and respectfully requests that it be permitted to intervene, granted access to all work papers and highly confidential information, and be made a party to this case for all purposes.

Respectfully Submitted,

<u>/s Andrew J. Linhares</u> Andrew J. Linhares, Mo. Bar. ID 63973 409 Vandiver Dr., Building 5, Suite 205 T: (314) 471-9973 F: (314) 558-8450 Andrew@renewmo.org

ATTORNEY FOR RENEW MISSOURI ADVOCATES

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing document was mailed, faxed, or emailed to all counsel of record on this <u>13th</u> day of October 2017.

<u>/s/ Andrew J. Linhares</u> Andrew J. Linhares