

**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)	File No. ET-2025-0184
for Approval of New Modified Tariffs for)	
Service to Large Load Customers)	

SIERRA CLUB’S APPLICATION TO INTERVENE

Pursuant to the Commission’s May 19, 2025 Order Directing Notice, Setting an Intervention Deadline, and Directing Staff to File a Pleading, and 20 CSR 4240-2.075, Sierra Club files this Application to Intervene in the above-listed matter and 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 over 615,000 members nationwide and approximately 9,000 members in Missouri, many of whom reside in Ameren’s service territory and are Ameren ratepayers.

2. Sierra Club exists for the purpose of preserving and protecting environmental values. 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 issues including asthma, mercury poisoning, sudden infant death syndrome, and respiratory problems, among others. Consistent with this mission, Sierra Club has long advocated for transitioning the electricity sector from coal- and gas-burning generation to cleaner and lower cost forms of energy, such as energy efficiency, renewable energy sources, and energy storage. Data centers are one of the fastest growing segments of electricity consumption, and Ameren via this docket announced that it is expecting over fifteen gigawatts of load growth going forward. Sierra Club has an interest in ensuring that demand growth attributable to large energy users is met using clean energy resources. Sierra Club and its members also have an interest in ensuring that the

costs of Ameren's resource additions are fairly allocated, and that the costs and benefits of renewable energy are properly valued. Accordingly, Sierra Club's interests will be favorably affected if Ameren aggressively pursues renewable energy projects that will displace fossil fuel generation to meet load growth needs. Further, Sierra Club's interests will be harmed if the decision in this proceeding fails to allocate the appropriate costs to the data center customers or if the decision inhibits the ability of renewables to serve load. Sierra Club further has an interest in assuring that the incremental generation and transmission needed to serve large load customers are appropriately allocated to those customers and therefore do not burden other customers.

3. Sierra Club has a long history of participating in Commission proceedings, and it has been a party to many previous Ameren triennial IRP, IRP update, MEEIA, and rate proceedings. In addition, Sierra Club recently intervened in Evergy's large load tariff dockets before the Missouri Public Service Commission and Kansas Corporation Commission.

4. Sierra Club's interest in promoting cleaner and lower-cost forms of energy is different from that of the general public and could be adversely affected by unreasonable resource planning decisions and tariff design that prolong reliance on aging coal-burning plants and other fossil generation and discourage a transition to renewable generation. Sierra Club's environmental interests could also be harmed if large customers are unreasonably subsidized by existing customers in a way that supports uneconomic use of pollution-emitting resources. Sierra Club's intervention in this docket would serve the public interest in promoting prudent tariff design, public health, and the reduction of greenhouse gas emissions.

5. Sierra Club has not yet determined the positions it will take in this matter because it is still reviewing the proposed tariff structures, and discovery may also be necessary to help form such positions. Accordingly, Sierra Club expects to review the application more

thoroughly, and conduct and analyze discovery, after which it will decide whether to submit testimony that will articulate its position(s) on discrete issues.

6. Correspondence, communications, orders and decisions in this case may be sent to:

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WHEREFORE, Sierra Club respectfully requests the Public Service Commission grant this Application to Intervene.

Respectfully Submitted,

/s/ Caitlin Stiltner

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CERTIFICATE OF SERVICE

I hereby certify that on this 12th day of June, 2025, a true and correct copy of the foregoing pleading was filed on EFIS and sent by email to all parties of record.

/s/ Caitlin Stiltner

Caitlin Stiltner
