## 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 Permission and Approval and	)	
Certificates of Public Convenience and	)	File No. EA-2025-0238
Necessity Authorizing it to Construct a New	)	
Generation Facility and Battery Energy	)	
Storage System	)	

## **APPLICATION TO INTERVENE OF RENEW MISSOURI ADVOCATES**

COMES NOW, Renew Missouri Advocates d/b/a Renew Missouri ("Renew Missouri"), and pursuant to 20 CSR 4240-2.075, applies to intervene in the above-captioned case. For its *Application to Intervene* Renew Missouri states:

- 1. Renew Missouri is a non-profit corporation organized under the laws of Missouri with its principal place of business at 501 Fay Steet, Suite 206, Columbia, Missouri, 65201. Renew Missouri is a registered fictitious name of Renew Missouri Advocates under § 417.200, RSMo. Renew Missouri is a non-profit policy group whose mission is to transform Missouri into a leading state in renewable energy and energy efficiency.
- 2. As advocates for renewable energy and energy efficiency efforts in Missouri, Renew Missouri's interests are different than those of the general public and may be adversely affected by a final order arising from this case if policies hindering those efforts are adopted.
- 3. Granting Renew Missouri intervention will serve the public interest by assisting the Commission's record for decision in this case, and no party will be adversely affected by such intervention.
- 4. Renew Missouri has not yet taken a final position in this specific case based on the application and forthcoming evidence, but generally advocates for policies that promote the

transition to more reliance on renewable energy, as well as energy efficiency efforts that encourage energy savings, decreased reliance on fossil fuel generation, and increased affordability. Renew Missouri asserts it will be able to take a position in responsive testimony, after reviewing forthcoming testimony and discovery in the case.

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

Nicole Mers

501 Fay Street

Suite 206

James Owen

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Columbia, MO 65201 Columbia, MO 65201

nicole@renewmo.org

General Counsel Executive Director

**WHEREFORE,** Renew Missouri respectfully requests that the Commission grant this *Application to Intervene*, along with any further relief the Commission deems proper.

Respectfully,

## /s/ Nicole Mers

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GENERAL COUNSEL FOR RENEW MISSOURI ADVOCATES

## **CERTIFICATE OF SERVICE**

I hereby certify that copies of the foregoing have been emailed to all counsel of record this 15th day of July 2025.

/s/	Nicole Mers	