

**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)	Case No. EA-2025-0239
Certificates of Convenience and Necessity)	
Authorizing it to Construct Renewable)	
Generation Facilities)	

SIERRA CLUB’S APPLICATION TO INTERVENE

Pursuant to the Commission’s September 2, 2025 Order Directing Notice, Setting Intervention Deadline, and Directing Staff Recommendation, 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 610,000 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. Sierra Club’s interest in protecting and enhancing the quality of ambient air and water throughout the state will be favorably affected if Ameren aggressively pursues renewable energy projects that will displace fossil fuel generation.

3. Sierra Club has a long history of participating in Commission proceedings, and it has been a party to many previous Ameren certificates of convenience and necessity, energy efficiency, integrated resource planning, and rate proceedings.

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 an order inhibiting the construction of new renewable resources, which could prolong reliance on aging coal-burning plants and other fossil generation and discourage a transition to renewable generation. Sierra Club's intervention in this docket would serve the public interest in promoting prudent resource planning, 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 discovery may 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:

Sarah Rubenstein (MO Bar #48874)
Great Rivers Environmental Law Center
4625 Lindell Blvd, Suite 200
St. Louis, Missouri 63108
(314) 231-4181
srubenstein@greatriverslaw.org

Sunil Bector
Sierra Club
2101 Webster, Suite 1300
Oakland, CA 94612
(415) 977 - 5759
sunil.bector@sierraclub.org

Caitlin Stiltner (MO Bar #77224)
Great Rivers Environmental Law Center
4625 Lindell Blvd, Suite 200
St. Louis, Missouri 63108
(314) 231-4181
cstiltner@greatriverslaw.org

Tony Mendoza
Sierra Club
2101 Webster, Suite 1300
Oakland, CA 94612
(415) 977-5589
tony.mendoza@sierraclub.org

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

Respectfully Submitted,

/s/ Sarah Rubenstein

Sarah Rubenstein (MO Bar #48874)
Caitlin Stiltner (MO Bar #77224)
Great Rivers Environmental Law Center
4625 Lindell Blvd, Suite 200
St. Louis, Missouri 63108
(314) 231-4181
srubenstein@greatriverslaw.org
cstiltner@greatriverslaw.org

Counsel for Sierra Club

CERTIFICATE OF SERVICE

I hereby certify that on this 18th day of September, 2025, a true and correct copy of the foregoing pleading was filed on EFIS and sent by email to all parties of record.

/s/ Sarah Rubenstein