

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) **File No. ET-2016-0246**
Approval of a Tariff Setting a Rate for)
Electric Vehicle Charging Stations)

APPLICATION TO INTERVENE OF SIERRA CLUB

Come now Sierra Club, and pursuant to 4 CSR 240-2.075, applies to intervene herein. In support of its motion to intervene, Sierra Club 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 more than 600,000 members nationally and over 8,600 members in Missouri, many of whom reside in the service territory of Union Electric Company d/b/a Ameren Missouri (“Ameren”) and are Ameren ratepayers. The Missouri Chapter of Sierra Club has an office at 2818 Sutton Blvd, St. Louis, MO 63143; email john.hickey@sierraclub.org; telephone 314-644-1011. Sierra Club exists for the purpose of preserving and protecting environmental values, and for years has been actively concerned with protecting air and water quality throughout the state of Missouri. Sierra Club’s interest in protecting and enhancing the quality of ambient air and water throughout the state will be favorably affected if Ameren acts to displace its fossil fuel generation through renewable energy, energy efficiency and demand response programs, and supports widespread transportation electrification through programs designed to lower barriers to electric vehicle adoption. Sierra Club is concerned with the build-up of greenhouse gases that lead to global warming, and with

pollution from non-renewable fossil fuel sources that can result in a host of health problems including asthma, mercury poisoning, sudden infant death syndrome, and respiratory, cardiovascular, and reproductive harms. To limit these climate and public health impacts, Sierra Club actively supports the increased use of renewable generating resources, increased energy efficiency, and the acceleration of transportation electrification, among other measures.

2. Sierra Club seeks to intervene in this proceeding because of its strong interest in addressing the barriers to the adoption of Electric Vehicles (“EV”s), including access to charging infrastructure, in a manner that will maximize benefits for the electricity grid and the environment while accelerating EV adoption. Not only do EVs lack the dangerous tailpipe emissions that can lead to the negative health impacts identified above, but vehicle electrification has the potential to improve the electricity grid by improving its reliability and efficiency, and facilitating integration of renewable resources. Movants have a wealth of knowledge and experience in the complex issues relating to utility program investment in transportation electrification, particularly in the design of EV charging infrastructure deployments and associated electricity rates.

3. Correspondence, communications, orders, and decisions may be sent to:

Henry B. Robertson (Mo. Bar No. 29502)
Great Rivers Environmental Law Center
319 N. Fourth Street, Suite 800
St. Louis, Missouri 63102
(314) 231-4181
(314) 231-4184 (facsimile)
hrobertson@greatriverslaw.org

4. Sierra Club participated in the Commission’s Working Case Regarding

Electric Vehicle Charging Facilities, EW-2016-0123. Sierra Club provided extensive comments on the legal, technical, and policy issues related to EV charging, and submitted letters from over four hundred Missouri residents in support of Commission action to advance vehicle electrification. Joe Halso, an Associate Attorney with Sierra Club, also appeared as a panelist at the Commission workshop held on May 25, 2016.

5. Movant's interests focus on environmental protection and hence are different from those of the general public and could be adversely affected by the Commission's order in this case.

6. Sierra Club supports widespread vehicle electrification and is generally supportive of utility driven efforts to advance that goal, but is not yet certain of the position it will take in this case.

7. It will serve the public interest for the Public Service Commission to grant this application to intervene.

WHEREFORE, Sierra Club respectfully requests the Public Service Commission to grant the application to intervene.

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Attorney for applicant

CERTIFICATE OF SERVICE

I hereby certify that a true and correct PDF version of the foregoing was filed on EFIS and sent by email on this 31st day of August, 2016, to all counsel of record:

/s/ Henry B. Robertson
Henry B. Robertson