

**BEFORE THE PUBLIC SERVICE COMMISSION
OF THE STATE OF MISSOURI**

In the Matter of Union Electric Company	)	
d/b/a Ameren Missouri, for Permission	)	File No. EA-2026-0226
And Approval and Certificates of Public	)	
Convenience and Necessity for a Natural Gas	)	
Electrical Generation Facility	)	

**RENEW MISSOURI'S AND SIERRA CLUB'S
APPLICATION TO INTERVENE**

Renew Missouri and Sierra Club, together, pursuant to 20 CSR 4240-2.075, apply to intervene in this docket.

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. Sierra Club is a nonprofit organization organized and existing under the nonprofit corporation laws of the state of California. Sierra Club has more than 595,000 members nationally and more than 8,800 members in Missouri, many of whom reside in Ameren Missouri's service territory and are Ameren Missouri ratepayers. The Missouri Chapter of Sierra Club has an office at 725 Kingsland Ave, University City, MO 63130.

3. All communications and pleadings in this case should be directed to:

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4. Renew Missouri's mission is to support the region's transition to clean energy, promote energy efficiency policies in the region to reduce energy demand and increase affordability, and adoption of policies to enable a sustainable, renewable energy sector and economy through federal, state, and local advocacy effort. This advocacy includes work to protect and strengthen existing laws, develop new policies, and represent clean energy interests in utility cases. Renew Missouri also actively engages in efforts against policies that increase polluting sources of generation, like natural gas, efforts to reduce decarbonization progress, or reductions in funding for energy efficiency. Decisions that increase adoption of gas-burning generation negatively impact Renew Missouri's mission in promoting the transition to clean energy.

5. Sierra Club exists for the purpose of preserving and protecting environmental values. Consistent with this mission, Sierra Club for many years has 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 Missouri pursues renewable energy, energy efficiency, and

demand response programs that displace fossil fuel generation. Sierra Club is concerned with emissions of greenhouse gases that cause climate change and with pollution from coal and gas that causes a host of health problems including asthma, mercury poisoning, sudden infant death syndrome, respiratory problems, and other issues.

6. Renew Missouri has been a party to numerous Ameren Missouri general rate cases, as well as certificate of convenience and necessity, integrated resource planning, energy efficiency and other electric utility proceedings .

7. Sierra Club has been a party to numerous Ameren Missouri general rate cases, as well as integrated resource planning, energy efficiency, vehicle electrification, and other proceedings.

8. In this proceeding, Ameren Missouri seeks a certificate of convenience and necessity (“CCN”) for a 2100 MW multi-unit combined cycle natural gas-fired electric generation facility to be located at the site of the Company’s existing Sioux Energy Center in West Alton, Missouri, which is in St. Charles County.¹ Ameren Missouri also seeks a Commission determination that the West Alton project constitutes replacement electric generation requirements under the “watt-for-watt” statute contained in Senate Bill No. 4 ((specifically, Section 393.401, RSMo. (Cum. Supp. 2026)).²

9. 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. Renew Missouri 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

¹ Application at 4.

² Application at 7.

fossil fuel generation, and increased affordability. These efforts will be hindered by unreasonable resource planning decisions. Renew Missouri therefore has a specific interest in ensuring Ameren Missouri's cost modeling and review of alternative generation resources is adequate and appropriate. 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.

10. Sierra Club has an interest in the outcome of this proceeding. Sierra Club's interest in promoting cleaner forms of energy is different from that of the general public, and could be adversely affected by unreasonable resource planning decisions that prolong reliance on aging coal-burning plants and discourage a transition to renewable generation or that allow construction of new gas generation without adequate demonstration of need or consideration of alternatives. 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. Sierra Club's participation in this proceeding will also aid the public interest and the Commission's decision in this matter through development of a robust factual record. Sierra Club has a specific interest in this proceeding in assuring that Ameren Missouri considered reasonable alternatives to the West Alton project.

11. Renew Missouri and Sierra Club have not yet determined the positions they will take in this case. Accordingly, Renew Missouri and Sierra Club expect to conduct and analyze discovery, after which they will decide whether to submit testimony that will articulate its position(s) on discrete issues.

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

WHEREFORE, Renew Missouri and Sierra Club respectfully requests the Public Service Commission to grant this joint application to intervene.

/s/ Nicole Mers

Nicole Mers

General Counsel

Renew Missouri

Phone: 314-308-2729

nicole@renewmo.org

Attorney for Renew Missouri and Sierra Club

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing was filed on EFIS and sent by email, on this 14th day of August, 2026, to all counsel of record.

/s/ Nicole Mers
Nicole Mers