

BEFORE THE PUBLIC SERVICE COMMISSION
OF THE STATE OF MISSOURI

In the Matter of Union Electric Company d/b/a)
Ameren Missouri's Tariffs to Adjust its) Case No. ER-2021-0240
Revenues for Electric Service)

**APPLICATION TO INTERVENE OF NATURAL RESOURCES DEFENSE
COUNCIL**

Comes now the Natural Resources Defense Council (NRDC) and, pursuant to 4
CSR 240-2.075, applies to intervene herein and become a party for all purposes.

1. NRDC is a nonprofit corporation organized under the laws of New York
with a Midwest office at 20 North Wacker Drive, Suite 1600, Chicago, IL 60606;
contact Ashok Gupta at that address or at 212-243-4351. It has over 4,800 members in
Missouri, many of whom are Ameren customers. NRDC and its members are interested
in promoting energy efficiency, peak demand reduction and renewable energy resources
to meet Missouri's energy needs. NRDC has been active in PSC dockets concerning the
Missouri Energy Efficiency Investment Act, electric utility rate cases and IRPs,
rulemakings, and working dockets on renewable energy, efficiency, and regulatory
policy.

2. NRDC is interested in issues presented in this case including rate design,
capital investments, and distributed renewable energy. At this point NRDC does not
know what position it will take on the issues in this case.

3. NRDC will bring significant expertise to this proceeding. The Staff of
NRDC has extensive history with the design and implementation of utility programs and
policies designed to deploy cost-effective renewable energy, energy efficiency and peak

demand reduction to benefit the public.

4. Correspondence, communications, orders and decisions may be sent to the undersigned legal counsel.

5. NRDC has interests different in their environmental focus from those of the general public or average ratepayer, which could be adversely affected by the decision in this case.

6. It will serve the public interest for NRDC to be allowed to intervene.

WHEREFORE, NRDC respectfully requests the Public Service Commission to grant this application to intervene.

/s/ Henry B. Robertson
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Attorney for NRDC

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 22nd day of April, 2021, to all counsel of record.

/s/Henry B. Robertson
Henry B. Robertson