

BEFORE THE PUBLIC SERVICE COMMISSION
OF THE STATE OF MISSOURI

In The Matter of Ameren Missouri's)	
2017 Utility Resource Filing Pursuant to)	Case No. EO-2018-0038
4 CSR 240 – Chapter 22)	

APPLICATION TO INTERVENE OF SIERRA CLUB

Comes now Sierra Club, and pursuant to 4 CSR 240-2.075, applies to intervene herein. In support of its application 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 800,000 members nationally and over 12,000 members in Missouri, many of whom reside in Ameren's service territory and are Ameren ratepayers. The Missouri Chapter of the 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 has been a party to Ameren rate cases ER-2012-0166, ER-2014-0258 and ER-2016-0179; to Ameren's MEEIA plan dockets, EO-2012-0142 and EO-2015-0055; to Ameren's electric vehicle docket, ET-2016-0246; and to Ameren's Integrated Resource Plans going back to 2005. The Club is a member of Ameren's stakeholder advisory group for demand-side management.

3. Sierra Club's interests in promoting low-cost, clean energy generation and environmental protection are distinct from those of the public at large and may be adversely affected by Ameren's twenty year plan. Sierra Club is uniquely situated to represent the interest of its members in this proceeding as a result of its expertise and experience in energy policy and law, and environmental regulations that affect the market for energy generation. Further, Sierra Club may provide the Commission with legal, technical, and economic information to help develop a record that will provide the Commission with evidence on issues that may not otherwise be analyzed.

4. Sierra Club is not yet certain of the position it will take in this case.

5. It will serve the public interest for the PSC to grant this application to intervene.

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

/s/ Henry B. Robertson
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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 16th day of October, 2017, to all counsel of record.

/s/ Henry B. Robertson
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