

BEFORE THE PUBLIC SERVICE COMMISSION
OF THE STATE OF MISSOURI

In re: Union Electric Company's 2014)	
Utility Resource Filing Pursuant to)	Case No. ER-2015-0084
4 CSR 240 – Chapter 22)	

**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 in respect to Ameren Missouri's 2014 triennial IRP filing.

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 Rebecca Stanfield at that address, by email at rstanfield@nrdc.org, telephone 312-651-7910, fax 312-234-9633; also Patrick Kenneally at the same office, 312-651-7917. NRDC has more than 4,800 members in Missouri as of this date, many of whom are Ameren ratepayers. NRDC and its members are interested in promoting energy efficiency, peak demand reduction and renewable energy resources to meet Missouri's energy needs. NRDC seeks to intervene in this proceeding in order that its members and others may benefit from well designed and cost-effective energy efficiency programs and renewable resources.

2. NRDC expects issues to arise in this case concerning MAP and RAP DSM and the customer benefits and utility costs resulting from demand-side management and distributed renewable energy. At this point NRDC does not know what position it will

take on the issues in this case.

3. NRDC has a continuing interest in the success of demand-side programs in Missouri. NRDC participated in the MEEIA rulemaking and subsequent MEEIA implementation dockets. It was also a party to the stipulation and agreement reached with Ameren Missouri in Case No. EO-2012-0142; and a party to Ameren rate cases ER-2010-0036, ER-2011-0028, and ER-2012-166 and currently ER-2014-0258; and Ameren IRP case EO-2011-0271. It is also a member of Ameren's stakeholder advisory group for demand-side management.

4. 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 energy efficiency and peak demand reduction to benefit the public. NRDC has intervened and/or provided testimony on these issues in public utility commission proceedings in many states, including Illinois, Ohio, Wisconsin, New York, Oregon, Iowa, New Jersey and California. NRDC has regularly presented testimony before the US Congress and various state legislatures related to the electric utility industry's use of energy efficiency resources, rate design, utility planning and other topics relevant to this proceeding.

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

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

7. 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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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, 2014, to all counsel of record.

/s/Henry B. Robertson
Henry B. Robertson