

BEFORE THE PUBLIC SERVICE COMMISSION  
OF THE STATE OF MISSOURI

In Re: Union Electric Company's Change                    )  
to its 2011 Utility Resource Filing Pursuant to        )  
4 CSR 240—Chapter 22    )  
Case No. EO-2012-0127

**MOTION TO INTERVENE OF SIERRA CLUB,  
MISSOURI COALITION FOR THE ENVIRONMENT, NRDC AND  
MID-MISSOURI PEACEWORKS**

Come now Sierra Club, Missouri Coalition for the Environment (“Coalition”), the Natural Resources Defense Council (“NRDC”), and Missouri Nuclear Weapons Education Fund, operating as Mid-Missouri Peaceworks (“Peaceworks”) and Missourians for Safe Energy, and pursuant to 4 CSR 240-2.075, apply to intervene herein. In support of their motion to intervene, Sierra Club, Coalition, NRDC and Peaceworks state the following.

1. Sierra Club, Coalition and Peaceworks have been parties and stakeholders in Ameren’s IRPs since early 2006. NRDC has been a stakeholder by agreement with Ameren since January, 2010.

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 700,000 members nationally, and about 4,100 members who reside in St. Louis City and County, St. Charles County and other parts of Ameren’s Missouri service territory and are Ameren ratepayers. The Missouri Chapter of the Club has an office at 7164 Manchester, St. Louis, MO 63143; email john.hickey@sierraclub.org; telephone 314-644-1011. Sierra Club exists for the purposes 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 adversely affected if Ameren builds any new power plants from non-renewable polluting sources such as coal or natural gas. Sierra Club is concerned with the build-up of greenhouse gases which lead to global warming, and with pollution from non-renewable sources which cause a host of health problems including asthma, mercury poisoning, sudden infant death syndrome, respiratory problems, and other problems. Sierra Club has been actively encouraging the use of energy efficiencies and renewable energy sources.

3. **Missouri Coalition for the Environment** is a nonprofit corporation with approximately 750 members. Its office is at 6267 Delmar Blvd., Suite 2E, St. Louis, MO 63130; email [klogansmith@moenviron.org](mailto:klogansmith@moenviron.org); telephone 314-727-0600; fax 314-727-1665. The Coalition and many of its members are Ameren ratepayers. In addition, the Coalition and its members have a strong interest in protecting Missouri's environment, including advocating for the reduction of air pollution from electric utilities, ensuring that nuclear plants do not contaminate the environment, avoiding damage to water quality and the environment from hydroelectric or pumped storage facilities, and advocating for other generating facilities to have as low an environmental impact as possible. The Coalition also supports aggressive implementation of cost-effective utility DSM programs

4. **NRDC** is a nonprofit corporation organized under the laws of New York with a Midwest office at 2 North Riverside Plaza, Suite 2250, Chicago, IL 60606; contact Rebecca Stanfield at that address or at 312-651-7910. It has 6,179 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. 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.     **The Missouri Nuclear Weapons Education Fund**, operating as Mid-Missouri Peaceworks and Missourians for Safe Energy, is a Missouri nonprofit corporation, located at 804C E. Broadway, Columbia, Missouri, 65201. Its telephone number is 573-875-0539; email [mail@mosafeenergy.org](mailto:mail@mosafeenergy.org). It has approximately 500 members. Missourians for Safe Energy is a project of Peaceworks. Peaceworks is deeply concerned with the creation of a sustainable future. It has worked for many years to educate the public on the need to make our economy as energy efficient as possible, so as to reduce environmental pollution, reverse the degradation of air and water quality, address the very pressing issue of global climate change, and assure a supply of energy

from renewable sources to meet the needs of our progeny. Peaceworks has strong concerns over nuclear weapons and their proliferation, and is therefore an advocate of a non-nuclear weapons future. As nuclear power and nuclear weapons are inexorably tied to each other, this makes any expansion of nuclear power generation a concern of Peaceworks in terms of its proliferation impact. Many of Peaceworks' members are ratepayers of Ameren and therefore have an economic interest in the company pursuing the most cost-effective long-run strategy for meeting energy needs.

6. All the applicants herein intervened in the 2011 IRP to advocate for strong DSM programs. Accordingly, they will oppose the change sought by Ameren.

7. Movants' interests focus on environmental protection and hence are different from those of the general public and could be adversely affected by an order approving the change in the 2011 IRP.

8. This application is timely filed in that it meets the Commission's Order requiring such applications be filed by November 28, 2011.

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

WHEREFORE, Sierra Club, Missouri Coalition for the Environment, Natural Resources Defense Council and Peaceworks respectfully request the Public Service Commission to grant the application to intervene.

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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 28th day of November, 2011, to the parties on the Commission's service list:

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Henry B. Robertson