

BEFORE THE PUBLIC SERVICE COMMISSION
OF THE STATE OF MISSOURI

In the Matter of Union Electric Company d/b/a)	
AmerenUE's Tariffs to Increase its Annual)	Case No. ER-2012-0166
Revenues for Electric Service)	Tariff No. YE-2012-0370

**MOTION TO INTERVENE OF NRDC, SIERRA CLUB,
AND RENEW MISSOURI**

Come now Sierra Club, Earth Island Institute d/b/a Renew Missouri, and the Natural Resources Defense Council ("NRDC"), and pursuant to 4 CSR 240-2.075, apply to intervene herein. In support of their motion to intervene, Sierra Club, NRDC and Renew Missouri state 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 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 Missouri's 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 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 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 efficiency and renewable energy sources, while opposing coal-fired generation.

2. **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 over 6,000 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. 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 Missouri, 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. NRDC also works to reduce coal-fired generation.

3. **Earth Island Institute** is a non-profit corporation organized under the laws of California with approximately 120 members in Missouri. Its principal place of business is 2150 Allston Way, Suite 460, Berkeley, CA 94704. Earth Island has a Certificate of Authority for a Foreign Nonprofit granted by the Missouri Secretary of State. Earth Island provides fiscal sponsorship and other support to environmental projects working toward ecological sustainability. Supporting alternative energy resources—efficiency and

renewable energy—is part of this mission. **Renew Missouri** is a registered fictitious name of Earth Island Institute under § 417.200, RSMo, by which Earth Island supports energy programs in Missouri. Renew Missouri supports aggressive implementation of cost-effective utility DSM programs and renewable energy generation and procurement. Its office is located at 910 E. Broadway, Suite 205, Columbia, MO 65201; pj@renewmo.org.

4. Correspondence, communications, orders and decisions may be sent to:

Henry B. Robertson (Mo. Bar No. 29502)
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5. Movants' interests are different from those of the general public and could be adversely affected by the Commission's order in this case. These parties are intervenors in Ameren's MEEIA filing, Case No. EO-2012-0142, which, if approved in that case, the company intends to implement in this case. Movants' interests will be adversely affected by an order approving inadequate levels of DSM programs or an unreasonable demand-side investment mechanism. Movants are also concerned with Ameren's over-reliance on coal, the adverse effects of coal on public health and climate change, and the increasing costs of coal, which make up the largest share of the proposed rate increase. Movants are concerned in Ameren's implementation of the Renewable Energy Standard. Finally, Movants are intervenors in Ameren's IRP, Case No. EO-2011-0271, and are concerned with its implementation in this case.

6. Movants are not yet certain of the position they will take in this case.

7. For the foregoing reasons, it will serve the public interest for the PSC to grant this application to intervene.

WHEREFORE, Sierra Club, Renew Missouri, and the Natural Resources Defense Council respectfully request 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 23d day of February, 2012, to all counsel of record:

/s/ Henry B. Robertson

Henry B. Robertson