

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) Case No. EO-2012-0127
4 CSR 240—Chapter 22)

**MOTION TO INTERVENE OF EARTH ISLAND INSTITUTE d/b/a RENEW
MISSOURI**

Comes now the Earth Island Institute d/b/a Renew Missouri, and, pursuant to 4 CSR 240-2.075, applies to intervene herein and become a party.

1. 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 and filed herewith.

2. 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.

3. Renew Missouri is a registered fictitious name of Earth Island Institute (see accompanying registration of fictitious name) 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. Earth Island Institute d/b/a Renew Missouri will oppose the change sought by Ameren Missouri to its Preferred Resource Plan.

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

Henry B. Robertson (Mo. Bar No. 29502)
Great Rivers Environmental Law Center
705 Olive Street, Suite 614
St. Louis, Missouri 63101
(314) 231-4181
(314) 231-4184 (facsimile)
hrobertson@greatriverslaw.org

6. Earth Island Institute d/b/a Renew Missouri has interests focused on environmental sustainability that are different from the broader interests of the general public or average ratepayer, and which could be adversely affected by the decision in this case.

7. It will serve the public interest for Renew Missouri to be allowed to intervene.

WHEREFORE, Earth Island Institute d/b/a Renew Missouri respectfully requests the Public Service Commission to grant this motion to intervene.

/s/ Henry B. Robertson
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St. Louis, Missouri 63101
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Attorney for Renew Missouri

CERTIFICATE OF SERVICE

I hereby certify that a true and correct PDF version of the foregoing was sent by email on this 28th day of November, 2011, to the parties of record on the Service List.

/s/Henry B. Robertson

Henry B. Robertson