

**BEFORE THE PUBLIC SERVICE COMMISSION
OF THE STATE OF MISSOURI**

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

APPLICATION TO INTERVENE
OF RENEW MISSOURI

COMES NOW, Earth Island Institute d/b/a Renew Missouri (“Renew Missouri”), and pursuant to 4 CSR 240-2.075, applies to intervene herein. For its Motion, Renew Missouri states:

1. Earth Island Institute is a non-profit corporation organized under the laws of California with its principal place of business at 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. Renew Missouri is a registered fictitious name of Earth Island Institute under § 417.200, RSMo, with its principal place of business at 910 E. Broadway, Suite 205, Columbia, MO 65201. Renew Missouri is a non-profit policy group whose mission is to transform Missouri into a leading state in renewable energy and energy efficiency by 2016.

2. Pleadings, notices and other correspondence in this case should be directed to:

Andrew J. Linhares
Staff Attorney, Renew Missouri
910 E. Broadway, Ste. 205
Columbia, MO 65201
(314) 471-9973
(314) 558-8450
andrew@renewmo.org

3. As advocates for renewable energy and energy efficiency policy in Missouri, Renew Missouri's interests are different than those of the general public and may be adversely affected by a final order arising from this case.

4. Granting Renew Missouri intervention will serve the public interest by assisting the Commission's record for decision in this case, and no party will be adversely affected by such intervention.

5. Renew Missouri has not yet taken a position in this case.

WHEREFORE, Renew Missouri respectfully requests that the Commission grant this *Motion to Intervene*, along with any further relief the Commission deems proper.

Respectfully Submitted,

/s/ Andrew J. Linhares

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ATTORNEY FOR RENEW MISSOURI

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing document was either mailed, faxed or emailed to all counsel of record on this 13th day of October, 2013.

/s/ Andrew J. Linhares

Andrew J. Linhares