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

In the Matter of the Application of Union Electric	)	
Company d/b/a Ameren Missouri for Permission and	)	
Approval and a Certificate of Public Convenience and	)	File No. EA-2016-0208
Necessity Authorizing It to Offer a Pilot Distributed Solar	)	
Program and File Associated Tariff	)	

## APPLICATION TO INTERVENE OF RENEW MISSOURI

COMES NOW, Earth Island Institute d/b/a Renew Missouri ("Renew Missouri"), pursuant to Missouri Public Service Commission rule 4 CSR 240-2.075 and the Commission's April 28, 2016 *Order Directing Notice, Setting Intervention Deadline, and Directing Filing of Staff Recommendation*, and applies to intervene in the above-styled case. In support of its Application, 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 not-for-profit clean energy policy and advocacy 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 910 E. Broadway, Ste. 205 Columbia, MO 65201 (314) 471-9973 (T) (314) 558-8450 (F) Andrew@renewmo.org

- 4. Renew Missouri has been involved in numerous cases and dockets involving renewable energy and solar policy before the Commission. Renew Missouri was instrumental in the passage of Proposition C in November, 2008, which gave rise to Missouri's Renewable Energy Standard ("RES") (§393.1025-1030, RSMo.). As advocates for the furtherance of renewable energy investment and best-practices renewable energy 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.
- 5. Granting Renew Missouri intervention will serve the public interest by assisting the Commission's record for decisions in this case, and no party will be adversely affected by such intervention.

WHEREFORE, Renew Missouri submits this Application to Intervene and respectfully requests that it be permitted to intervene, granted access to all work papers and highly confidential information, and be made a party to this case for all other purposes.

Respectfully Submitted,

/s/ Andrew J. Linhares

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ATTORNEY FOR EARTH ISLAND INSTITUTE d/b/a RENEW MISSOURI

## **CERTIFICATE OF SERVICE**

I hereby certify that a true and correct copy of the foregoing document was mailed, faxed, or emailed to all counsel of record on this 4<sup>th</sup> day of May 2016.

/s/ Andrew J. Linhares
Andrew J. Linhares