

**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 Necessity	)	File No. EA-2014-0136
Authorizing It to Construct, Install, Own, Operate, Maintain,	)	
and Otherwise Control and Manage Solar Generation	)	
Facilities in O’Fallon Missouri.	)	

**APPLICATION TO INTERVENE OF  
RENEW MISSOURI**

COMES NOW Earth Island Institute d/b/a Renew Missouri (“Renew Missouri”), pursuant to rule 4 CSR 240-2.075 and the Commission’s January 14, 2014 *Order and Notice Of Application* in this case, and hereby files this application to intervene. For its application, Renew Missouri states:

1. On January 13, 2014, pursuant to 4 CSR 240-2.060, 4 CSR 240-3.105, and Section 393.170, RSMo, Union Electric Company, d/b/a/ Ameren Missouri (“Ameren Missouri”) applied to the Missouri Public Service Commission (Commission) for a Certificate of Convenience and Necessity to build solar generation facilities in O’Fallon, Missouri. On January 14, 2014, the Commission issued an Order and Notice of Application. In its January 14, 2014 Order, the Commission established an intervention deadline of no later than February 3, 2014.

2. 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 Institute 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. As advocates for best-practices clean energy policy in Missouri and for maximum utility investment in renewable energy, 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. Renew Missouri has a specific interest in regards to the implementation of Missouri's Renewable Energy Standard ("RES"), or Sections 393.1025-1030, RSMo., which Renew Missouri was instrumental in drafting and passing in 2008.

3. Granting Renew Missouri intervention in this case will serve the public interest by assisting the Commission's record for decision.

4. Communications, correspondence, order and decision in this case should be addressed to:

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5. Renew Missouri is uncertain of the position it will take in this case.

WHEREFORE, Renew Missouri requests that it be permitted to intervene and be made a party to this case for all 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 do hereby certify that a true and correct copy of the foregoing document has been sent by electronic mail this 3<sup>rd</sup> day of February, 2014 to all parties of record in this case.

/s/ Andrew J. Linhares