

BEFORE THE PUBLIC SERVICE COMMISSION  
OF THE STATE OF MISSOURI

In the Matter of Union Electric Company d/b/a )  
Ameren Missouri's 3rd Filing to Implement ) **File No. EO-2018-0211**  
Regulatory Changes in Furtherance of Energy )  
Efficiency as Allowed by MEEIA )

**APPLICATION TO INTERVENE OF NATURAL RESOURCES DEFENSE  
COUNCIL**

Comes now the Natural Resources Defense Council (NRDC) and, pursuant to 4 CSR 240-2.075, applies to intervene herein and become a party for all purposes in respect to Ameren Missouri's third MEEIA Plan filing.

1. NRDC is a nonprofit corporation organized under the laws of New York with a Midwest office at 20 North Wacker Drive, Suite 1600, Chicago, IL 60606. NRDC has more than 4,800 members in Missouri, many of whom are Ameren ratepayers. NRDC and its members are interested in promoting energy efficiency, peak demand reduction, and efficiency-friendly rate designs to meet Missouri's energy needs. NRDC seeks to intervene in this proceeding in order that its members and others may benefit from well designed and cost-effective energy efficiency and demand response programs.

2. NRDC has a strong interest in maximizing the reach of cost-effective demand-side programs, but has been known to disagree with Ameren on specific issues. At this point NRDC does not know what position it will take on the issues in this case.

3. NRDC has a continuing interest in the success of demand-side programs in Missouri. NRDC participated in the MEEIA rulemaking and subsequent MEEIA implementation dockets. It was a party to the stipulation and agreement reached in

Ameren's first MEEIA plan in EO-2012-0142, and a party to Ameren's MEEIA Cycle 2 case EO-2015-0055. It is also a member of Ameren's stakeholder advisory group for demand-side management.

4. NRDC will bring significant expertise to this proceeding. 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 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.

5. Correspondence, communications, orders and decisions may be sent to the undersigned legal counsel.

6. NRDC has environmental interests different from those of the general public or average ratepayer, which could be adversely affected by the decision in this case.

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

WHEREFORE, NRDC respectfully requests the Public Service Commission to grant this application to intervene.

/s/ Henry B. Robertson  
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Attorney for NRDC

### **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 14th day of June, 2018, to all counsel of record.

/s/Henry B. Robertson  
Henry B. Robertson