

BEFORE THE PUBLIC SERVICE COMMISSION  
OF THE STATE OF MISSOURI

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

**APPLICATION TO INTERVENE OF SIERRA CLUB**

Comes now Sierra Club, and pursuant to 4 CSR 240-2.075, applies to intervene herein. In support of its motion to intervene, Sierra Club states the following.

1. Sierra Club is a nonprofit organization organized and existing under the nonprofit corporation laws of the state of California. Sierra Club has more than 600,000 members nationally and over 8,600 members in Missouri, many of whom reside in Ameren's service territory and are Ameren ratepayers. The Missouri Chapter of the Club has an office at 2818 Sutton Blvd, St. Louis, MO 63143; email [john.hickey@sierraclub.org](mailto:john.hickey@sierraclub.org); telephone 314-644-1011. Sierra Club exists for the purpose of preserving and protecting environmental values, and for years has been actively concerned with protecting air and water quality throughout the state of Missouri. Sierra Club is concerned with the build-up of greenhouse gases which lead to global warming, and with pollution from non-renewable sources which cause a host of health problems including asthma, mercury poisoning, sudden infant death syndrome, respiratory problems, and other problems. Sierra Club has been actively encouraging the use of energy efficiency and renewable energy sources, while opposing coal-fired generation.

2. The Sierra Club has been a party to Ameren rate cases ER-2012-0166 and ER-2014-0258; to Ameren's original MEEIA plan docket, EO-2012-0142, and the

Stipulation and Agreement reached therein; and to Ameren's Integrated Resource Plans going back to 2005. The Club is a member of Ameren's stakeholder advisory group for demand-side management.

3. Sierra Club's interests in promoting coal plant retirements, energy efficiency, and clean, low-cost energy resources is different from those of the general public and could be adversely affected by an order approving prolonged reliance on aging coal plants, inadequate levels of DSM programs and continued discouragement of renewable generation. Moreover, Sierra Club's staff and consultants have extensive experience in analyzing the feasibility and cost-effectiveness of coal and its alternatives. Sierra Club's intervention would serve the public interest in public health and the curtailment of greenhouse gases.

4. Sierra Club is not yet certain of the position it will take in this case.

5. It will serve the public interest for the PSC to grant this application to intervene.

WHEREFORE, Sierra Club respectfully requests the Public Service Commission to grant the application to intervene.

/s/ Henry B. Robertson  
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Attorney for Sierra Club

### **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 20th day of October, 2014, to all counsel of record.

/s/ Henry B. Robertson  
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