

BEFORE THE PUBLIC SERVICE COMMISSION
OF THE STATE OF MISSOURI

In the Matter of Union Electric Company)
d/b/a Ameren Missouri's Tariffs to Adjust its) No. ER-2022-0337
Revenues for Electric Service)

**APPLICATION TO INTERVENE OF
METROPOLITAN CONGREGATIONS UNITED**

Metropolitan Congregations United (MCU), pursuant to 20 CSR 4240-2.075, applies to intervene in this proceeding. In support of its Application, MCU states:

1. MCU is a membership organization made up primarily of congregations of multiple faiths throughout the St. Louis region. MCU works with its coalition of congregations to change public policy in the areas of environmental justice, criminal justice reform, housing, and voting rights. Most of MCU's member congregations are located within Ameren Missouri's service territory and the great majority of persons that are members of MCU's member congregations are Ameren Missouri ratepayers.

2. MCU considers safe, affordable, and accessible housing to be a basic human right. Many of the members of MCU's member congregations are financially burdened by the high cost of utilities. Notably, this energy burden disproportionately affects communities of color and populations that are economically disadvantaged. MCU knows that this disparity leads to other negative outcomes such as utility disconnections or foregoing other basic needs to keep the utilities on. In addition, MCU believes that flat residential customer charges are unjust because these charges tend to force higher costs disproportionately onto people who use the least electricity and can least afford higher

bills.

3. The interests of MCU in opposing flat residential customer charges are different from that of the general public and may be adversely affected by an order that authorizes an increase in a flat residential customer charge. MCU's intervention would serve the public interest by allowing it and its members to seek a tariff that considers the energy needs of future generations and that avoids the negative effects of an increase in the flat residential customer on today's generations.

4. All communications and pleadings in this case should be directed to Bruce A. Morrison and Ethan Thompson, Great Rivers Environmental Law Center, 319 North Fourth Street, Suite 800, Saint Louis, MO 63102, (314) 231-4181, bamorrison@greatriverslaw.org and ethompson@greatriverslaw.org.

5. MCU is not yet certain of the position it will take in this case.

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

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

/s/ Bruce A. Morrison
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CERTIFICATE OF SERVICE

I certify that a true and correct PDF version of the foregoing was filed on EFIS and sent by email on the 6th day of September, 2022, to all counsel of record.

/s/ Ethan Thompson
Ethan Thompson