

**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 Revenues for)
Electric Service)
)

File No. ER-2022-0337
Tracking No. YE-2023-0031

**CONSOLIDATED POST-HEARING BRIEF OF
THE MISSOURI STATE CONFERENCE OF THE NATIONAL
ASSOCIATION FOR THE ADVANCEMENT OF COLORED PEOPLE
AND METROPOLITAN CONGREGATIONS UNITED**

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Summary

The Missouri State Conference of The National Association for the Advancement of Colored People (“Missouri NAACP”) and Metropolitan Congregations United (“MCU”) file this consolidated brief and urge the Public Service Commission not to increase the monthly customer charge for Ameren’s residential customers.

The Proposed Increase Will Burden People of Color and The Poor

The NAACP

For approximately the past ten years, the National Association for the Advancement of Colored People (“NAACP”) has opposed proposed increases to flat residential customer utility charges. Low-income communities across the board pay a high proportion of their incomes on energy.¹ Further, African Americans and Native Americans pay the highest proportion of their incomes on energy than any other racial group.² Low-income households are more likely to have electricity shut offs³, thereby depriving them of essential services and too often resulting in dangerous circumstances through alternative heating efforts. In Ameren’s service territory, electric service disconnections are further concentrated in communities of color.⁴

For these same reasons the Missouri NAACP opposes the proposed increase here. The proposed residential customer charge increase will tend to force higher costs disproportionately onto many of its members who live within Ameren Missouri’s service territory. Many of these members use little electricity and can least afford higher energy bills.

¹ Exhibit 300, Direct Testimony of Jacqueline A. Hutchinson, pp. 4-10

² Exhibit 300, Direct Testimony of Jacqueline A. Hutchinson, p. 5

³ Exhibit 300, Direct Testimony of Jacqueline A. Hutchinson, pp. 8-10

⁴ Exhibit 301, Rebuttal Testimony of Jacqueline A. Hutchinson, pp. 4-6

MCU

For similar reasons, MCU opposes the proposed increase to the residential customer charge. Low-income households depend on reliable and affordable energy. Disruptions to household budgets threaten their jobs, education, and health.⁵ The proposed increase will have a disproportionate burden on especially black and brown families.⁶ Many of MCU's member congregations provide direct assistance in the form of food and help with bills and rent payments. On a daily and weekly basis, member congregations see the risks facing community members to sustain themselves, even with this assistance.

Further, MCU's congregations, members and neighbors continue to struggle with the impacts of the COVID pandemic. The proposed rate increase would add to that burden.⁷

The proposed increase would reduce incentives to invest in energy efficiency

Within their energy justice program, both the NAACP and the Missouri NAACP advocate for energy efficiency measures to be implemented at the state and local levels. Both work to educate their members about energy efficiency and energy savings. The Missouri NAACP opposes the proposed residential customer charge increase because it also would reduce incentives to conserve energy and result in many of its members losing control over their energy costs and options.⁸

⁵ Exhibit 200, Direct Testimony of Geoff Marke, pp. 5-7

⁶ Exhibit 300, Direct Testimony of Jacqueline A. Hutchinson, pp. 4-10; Exhibit 301, Rebuttal Testimony of Jacqueline A. Hutchinson, pp. 4-6

⁷ Exhibit 300, Direct Testimony of Jacqueline A. Hutchinson, pp. 6-7

⁸ Exhibit 450, Rebuttal Testimony of James Owen, p. 15

Relief Requested

The Missouri NAACP and MCU respectfully request that the Commission reject Ameren Missouri’s proposal to increase its residential monthly customer charge.

Respectfully submitted,

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CERTIFICATE OF SERVICE

The undersigned certifies that the foregoing document was electronically filed on this date via the Missouri PSC’s electronic filing system. Notice of this filing will be served upon all parties of record who have registered through this electronic filing system.

Date: May 5, 2023

/s/ Bruce Morrison
Bruce Morrison