



problems, and which tend to have a disproportionate impact on communities of color. The NAACP, the Missouri NAACP, and the NAACP local branches encourage energy efficiency measures and renewable energy sources and oppose coal-fired energy generation. In addition, the NAACP, the Missouri NAACP, and the NAACP local branches discourage flat residential customer charges because these charges tend to force higher costs disproportionately onto people who use the least electricity and can least afford higher bills and remove incentives to conserve energy.

3. The interests of the NAACP, the Missouri NAACP, and the NAACP local branches' in promoting coal plant retirements, energy efficiency, and clean, low-cost energy resources, and in discouraging flat residential customer charges, are different from that of the general public and may be adversely affected by an order that encourages prolonged reliance on aging coal plants, inadequate levels of DSM programs, underinvestment in renewable generation, and an increase in a flat residential customer charge. The Missouri NAACP's intervention would serve the public interest in promoting public health and in curtailing greenhouse gas emissions.

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

5. The Missouri NAACP 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, the Missouri NAACP respectfully requests that the Public Service Commission grant this application to intervene.

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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 31st day of August 2022, to all counsel of record.

/s/ Bruce A. Morrison  
Bruce A. Morrison