## 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

) No. ER-2022-0337

## APPLICATION TO INTERVENE OF THE MISSOURI STATE CONFERENCE OF THE NATIONAL ASSOCIATION FOR THE ADVANCEMENT OF COLORED PEOPLE

The Missouri State Conference of the National Association for the Advancement of Colored People (Missouri NAACP), pursuant to 20 CSR 4240-2.075, applies to intervene in this proceeding. In support of its Application, the Missouri NAACP states:

1. The National Association for the Advancement of Colored People (NAACP) is a membership organization whose members include persons who reside throughout Missouri. NAACP members who reside in Missouri are also members of the Missouri NAACP. (Missouri NAACP members are also members of local branches of the NAACP located throughout Missouri.) Many of the Missouri NAACP's members reside in Ameren's service territory and are Ameren ratepayers.

2. Through their Environmental and Climate Justice Programs, the NAACP, the Missouri NAACP, and the NAACP's local branches, work to address Environmental injustice, including the proliferation of climate change, which has a disproportionate impact on communities of color and low-income communities in Missouri, the United States, and around the world. The NAACP, the Missouri NAACP, and the NAACP local branches are concerned with the build-up of greenhouse gases which lead to global warming, and with pollution from non-renewable sources which cause numerous health

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.

2

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

> <u>/s/ Bruce A. Morrison</u> Bruce A. Morrison (Mo. Bar No. 38359) Great Rivers Environmental Law Center 319 N. Fourth Street, Suite 800 St. Louis, Missouri 63102 Tel. (314) 231-4181 bamorrison@greatriverslaw.org

Attorney for the Missouri NAACP

## **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