

BEFORE THE PUBLIC SERVICE COMMISSION
OF THE STATE OF MISSOURI

In the Matter of a Motion for an)
Emergency Order Establishing a)
Temporary Moratorium on Utility) Case No. AO-2021-0164
Discontinuances to Protect Public)
Health and Safety by Mitigating the)
Spread of the COVID-19 Pandemic)

RESPONSE OF SIERRA CLUB

The Sierra Club submits the following and attached comments in support of the Consumers Council of Missouri's Motion for an Emergency Order and Request for Expedited Treatment requesting the Commission issue a statewide moratorium on the involuntary disconnection or discontinuance of residential service by Commission-regulated electric, gas, and water corporations through at least March 31, 2021. Sierra Club also supports the motion's request that the Commission order the waiver of any late fees and related costs.

The Missouri Sierra Club Chapter represents more than 65,000 members and supporters in Missouri and our mission includes protecting and restoring both the natural and human environment. The COVID-19 pandemic represents one of the greatest short-term threats to human life in recent history. As of December 13, 2020, the virus had claimed the lives of more than 4,500 Missourians,¹ and more than 296,000 Americans².

Sierra Club believes that a moratorium is needed to protect the most vulnerable among us during the health and economic crises caused by the COVID-19 pandemic. The Consumers Council of Missouri's motion provides compelling arguments for a statewide moratorium, including strong evidence that a moratorium will help flatten the curve of COVID-19 infections and that moratoria on utility disconnections save lives.

¹ Missouri Department of Health and Senior Services: <https://showmestrong.mo.gov/data/statewide-public-health/>

² US Center for Disease Control COVID-19 Tracker: https://covid.cdc.gov/covid-data-tracker/#cases_casesper100klast7days

Attached are 499 comments (Attachment A) collected via online petitions by Sierra Club over the last several weeks from Missourians in the service territories of Ameren Missouri, Evergy Missouri West and Metro, and Empire District Electric addressed to the Commission supporting a moratorium on utility disconnections and other consumer protections. Of these, the first 219 include personalized messages.

Also attached is a letter from 15 organizations that was filed this summer in the Commission's working docket on COVID-19, Case No. AW-2020-0356, "Best Practices for Recovery of Past-Due Customer Payments After the COVID-19 Pandemic Emergency" (Attachment B). That letter called for a moratorium on disconnections and for several other consumer protections including no late or reconnection fees and a call to focus weatherization and energy efficiency programs on high-risk customers.

Strong organizational support for a moratorium during the pandemic has continued. Attached is an open letter released on December 10, 2020 from 20 organizations in Missouri and Kansas to Evergy, Governors Parson and Kelly, the Missouri Public Service Commission, the Kansas Corporation Commission and elected officials in Evergy's service territory in both states (Attachment C). The letter calls for a moratorium on disconnections and for several other consumer protections including reconnecting all currently disconnected customers with no fees or minimum balance payments. Shortly after this letter was released last Thursday, Evergy announced on Twitter that it was suspending disconnections until March 1, 2021.³

For these reasons, the Sierra Club supports the Consumers Council of Missouri's emergency petition and respectfully requests that the Commission implement a moratorium on utility disconnections, as well as other necessary consumer protections, to lessen the suffering of those most vulnerable among us and save lives during the COVID-19 pandemic.

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/s/ Henry B. Robertson

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³ <https://twitter.com/evergypower/status/1337117422726369284/photo/1>

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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 14th day of December, 2020, to all counsel of record.

/s/ Henry B. Robertson

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