

BEFORE THE PUBLIC SERVICE COMMISSION  
OF THE STATE OF MISSOURI

In The Matter of Union Electric Company d/b/a                    )  
Ameren Missouri’s 2020 Utility Resource                        ) **File No. EO-2021-0021**  
Filing Pursuant to 20 CSR 4240 – Chapter 22                    )

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 4 CSR 240-2.075, applies to intervene in this proceeding. In support of its application, the Missouri NAACP states:

1. The Missouri NAACP is the duly organized NAACP State Conference which furthers the NAACP’s mission within the State of Missouri.
2. The NAACP is a national non-profit organization with the mission to ensure the political, educational, social, and economic equality of rights of all persons and to eliminate race-based discrimination. The NAACP has an Environmental and Climate Justice Program (“ECJ Program”) which addresses environmental injustices that have a disproportionate impact on low income communities of color in the United States and around the world. The NAACP ECJ Program was created to provide resources and to support community leadership in addressing these types of human and civil rights issues by advocating to reduce harmful emissions, advance energy efficiency and clean energy, strengthen community resiliency and livability. The NAACP furthers its mission through the work of its duly organized State/State-Area Conferences, Branches, Prison Branches, College Chapters, Youth Councils, Junior Youth Councils, High School Chapters and Authorized Committees of the Association.
2. Through its ECJ Program, the Missouri NAACP works to address Environmental injustice, including the proliferation of climate change, which has a disproportionate impact on communities of color and low income communities. The

Missouri NAACP is 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 Missouri NAACP encourages energy efficiency measures and renewable energy sources, and opposes coal-fired energy generation.

3. The Missouri NAACP's interest in promoting coal plant retirements, energy efficiency, and clean, low-cost energy resources is different from that of the general public and may be adversely affected by an order approving prolonged reliance on aging coal plants, inadequate levels of DSM programs and under-investment in renewable generation, particularly in low income communities and communities of color. The Missouri NAACP's intervention would serve the public interest in promoting the public health and in curtailing greenhouse gas emissions.

4. The Missouri NAACP is not yet certain of the position it will take in this case.

5. 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.

/s/ Bruce A. Morrison

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

Fax (314) 231-4184

bamorrison@greatriverslaw.org

Attorney for the Missouri State Conference of

the National Association for the

Advancement of Colored People

CERTIFICATE OF SERVICE

I certify that a true and correct PDF version of the foregoing was filed on EFIS and sent by email on this 30th day of October, 2020, to all counsel of record.

/s/ Bruce A. Morrison  
Bruce A. Morrison