

BEFORE THE PUBLIC SERVICE COMMISSION

In the Matter of Union Electric Company d/b/a)
Ameren Missouri’s 2023 Utility Resource Filing) Case No. EO-2024-0020
Pursuant to 20 CSR 4240 – Chapter 22)

**APPLICATION TO INTERVENE OF THE MISSOURI STATE CONFERENCE
AND THE SAINT LOUIS COUNTY BRANCH 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”), and the Saint Louis County Branch of the National Association for the Advancement of Colored People (“St. Louis County NAACP”), pursuant to 4 CSR 240-2.075, apply to intervene in this proceeding. In support of their application, the Missouri NAACP and St. Louis County NAACP state:

1. The Missouri NAACP is the duly organized NAACP State Conference which furthers the mission of the National Association for the Advancement of Colored People (“NAACP”) within the State of Missouri. The St. Louis County NAACP is a duly organized Branch that furthers the NAACP’s mission within the County of Saint Louis, 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, and 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.

3. Through their ECJ Programs, the Missouri NAACP and St. Louis County NAACP work 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 and St. Louis County NAACP 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 Missouri NAACP and St. Louis County NAACP encourage energy efficiency measures and renewable energy sources and oppose coal-fired energy generation.

4. The Missouri NAACP's and St. Louis County NAACP's interests 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 and St. Louis County NAACP's intervention would serve the public interest in promoting the public health and in curtailing greenhouse gas emissions.

5. The Missouri NAACP and St. Louis County NAACP are not yet certain of the positions they will take in this case.

6. It will serve the public interest for the PSC to grant this application to intervene.

7. Communications, orders and decisions in this matter should be directed to the undersigned counsel at the mailing address, telephone number and email set forth below.

WHEREFORE, the Missouri NAACP and St. Louis County NAACP respectfully request that the Public Service Commission grant this application to intervene.

/s/ Bruce A. Morrison
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CERTIFICATE OF SERVICE

I certify that a true and correct copy of the foregoing was filed on EFIS and sent by email on this 19th day of October 2023, to all parties on the Commission's service list in this case.

/s/ Bruce A. Morrison