

BEFORE THE PUBLIC SERVICE COMMISSION  
OF THE STATE OF MISSOURI

In the Matter of Union Electric  
Company d/b/a Ameren Missouri  
2023 Utility Resource Filing  
Pursuant to 20 CSR 4240-Chapter  
22

File No. EO-2024-0020

**COMMENTS OF THE NAACP MISSOURI STATE CONFERENCE AND  
NAACP ST. LOUIS COUNTY BRANCH ON AMEREN MISSOURI'S  
2023 INTEGRATED RESOURCE PLAN**

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 20 CSR 4240-22.080 (8), submit the following comments on Ameren Missouri’s 2023 Integrated Resource Plan (“IRP”).<sup>1</sup>

*Introduction*

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

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<sup>1</sup> On October 19, 2023, in one application the Missouri NAACP and the Saint Louis County NAACP moved to intervene in this proceeding. On November 2, 2023, the Commission granted the application to intervene of the Missouri NAACP and did not mention the St. Louis County NAACP. The undersigned counsel is interpreting the Commission’s order as having granted intervention to both entities. Both entities are making one consolidated set of comments here. If the undersigned has misinterpreted the Commission’s order, then the undersigned respectfully requests that the Commission deem these comments to have been submitted by the Missouri NAACP only.

organized Branch that furthers the NAACP's mission within the County of Saint Louis, Missouri.

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 Conferences (the Missouri NAACP in this matter), its duly organized Branches (the St. Louis County branch in this matter), and its other duly organized Chapters, Councils, and Committees.

Through their own 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. In their work, the Missouri NAACP and St. Louis County NAACP follow the directives of the NAACP to encourage energy efficiency measures and renewable energy sources and oppose coal-fired energy generation.

## *Comments*

### ***Ameren Missouri should not overbuild its system.***

The Missouri NAACP and Saint Louis County NAACP echo the comments of Sierra Club and Renew Missouri about Ameren Missouri not overbuilding its system.<sup>2</sup> In 2016, the NAACP adopted a “Resolution Against Natural Gas as a Climate Solution, or a “Bridge” Fuel to a Clean Energy Future,” in which the “NAACP appeals to regulatory oversight authorities to protect the vulnerable families who are least able to afford the cost of overbuilding new plants and escalating fuel costs”.<sup>3</sup> It appears there is a likelihood of overbuilding here.

As of 2022, the poverty rate of the U.S. black population was 17.1%, compared to 11.5% for the nation.<sup>4</sup> A substantial number of the members the NAACP serves are poor. An overbuilding of Ameren Missouri’s energy generation system, and the resulting additional and unnecessary energy cost, would tend to hit many of the NAACP’s members especially hard.

The Missouri and Saint Louis County NAACP support the remedies suggested by Sierra Club and Renew Missouri.

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<sup>2</sup> Sierra Club’s Comments on Ameren’s 2023 Integrated Resource Plan, p. 13; Comments of Renew Missouri Advocates, pp. 11-12.

<sup>3</sup> See, <https://naacp.org/resources/resolution-against-natural-gas-climate-solution-or-bridge-fuel-clean-energy-future> (last viewed February 27, 2024).

<sup>4</sup> See, <https://www.census.gov/library/stories/2023/09/black-poverty-rate.html#:~:text=The%202022%20official%20poverty%20rate,not%20statistically%20different%20from%202021> (last viewed February 27, 2024).

***Ameren Missouri's Energy Efficiency Offerings Are Not Reaching Low Income Minority Communities.***

The Missouri NAACP and Saint Louis County NAACP appreciate Ameren Missouri's past efforts to deliver energy efficiency resources to its customer base. However, the NAACP believes these resources are not adequately reaching low-income minority communities.

The Missouri and Saint Louis County NAACP support the remedies suggested by Renew Missouri.<sup>5</sup> Both the Missouri NAACP and Saint Louis County NAACP would be interested in partnering with Ameren Missouri to see that these resources reach the communities the NAACP serves within Ameren Missouri's service territory.

*Conclusion*

The Missouri and Saint Louis County NAACP appreciate the opportunity to engage in Ameren Missouri's IRP process.

Respectfully submitted,

Dated: February 28, 2024

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<sup>5</sup> Comments of Renew Missouri Advocates, p. 10.