

BEFORE THE PUBLIC SERVICE COMMISSION  
OF THE STATE OF MISSOURI

In re: Union Electric Company's 2017	)	
Utility Resource Filing Pursuant to	)	Case No. EO-2018-0038
4 CSR 240 – Chapter 22	)	

APPLICATION TO INTERVENE OF NATIONAL ASSOCIATION  
FOR THE ADVANCEMENT OF COLORED PEOPLE

Comes now the National Association for the Advancement of Colored People (NAACP), and pursuant to 4 CSR 240-2.075, applies to intervene in this proceeding. In support of its motion, the NAACP states:

1. The 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 State Conference of the NAACP. Many of the NAACP's Missouri members reside in Ameren's service territory and are Ameren ratepayers. The NAACP has multiple branch offices throughout Missouri, including an office at 111 East High St., Jefferson City, Missouri 65101.

2. Through its Environmental and Climate Justice Program, the 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 in Missouri, the United States, and around the world. The 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 NAACP

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

3. The 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 underinvestment in renewable generation. The NAACP's intervention would serve the public interest in promoting public health and in curtailing greenhouse gas emissions.

4. The 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 NAACP respectfully requests the Public Service Commission to grant this application to intervene.

/s/ Bruce A. Morrison  
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Attorneys for National Association for the  
Advancement of Colored People

### **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 16th day of October, 2017, to all counsel of record.

/s/ Bruce A. Morrison  
Bruce A. Morrison