

BEFORE THE MISSOURI PUBLIC SERVICE COMMISSION

In the Matter of the Commission’s )  
Proposed Rule 20 CSR 4240-10.175 )  
Relating to Customer Information of ) **File No. OX-2025-0106**  
Electrical Corporations, Gas )  
Corporations, Heating Companies, )  
Certain Water Corporations and Certain )  
Sewer Corporations )

**COMMENTS OF THE SAINT LOUIS COUNTY NAACP  
REGARDING PROPOSED RULE 20 CSR 4240-10.175**

The Saint Louis County NAACP, for its comments on proposed rule 20 CSR 4240-10.175, states:

1. The National Association for the Advancement of Colored People (“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 (including energy burden) that have a disproportionate impact on low-income communities of color. The NAACP ECJ Program was created to provide resources and to support community leadership in addressing these types of human and civil rights issues. The NAACP furthers its mission through the work of its duly organized Conferences, Branches, Chapters, Councils and Committees.

2. The Saint Louis County Branch of the NAACP (“St. Louis County NAACP”) is a duly organized NAACP Branch that furthers the NAACP’s mission within the County of Saint Louis, Missouri. Through its ECJ Program, the St. Louis County NAACP works to address Environmental injustice, including energy burden, on communities of color and low-income communities in Saint Louis County.

3. The NAACP knows that black and brown energy customers are more likely to face service disconnections, whether because of energy inefficient housing, lower household income, or other factors.

4. To change the way Missourians view energy and energy justice, NAACP branches develop and implement education, awareness, and advocacy campaigns at the community level. Each community is different, and each community has different educational and organizing needs. To advance its mission regarding environmental justice and, specifically, energy burden, the NAACP and its branches (including the Saint Louis County branch) rely upon information that is tailored to impacted communities. Regarding energy service disconnections, the NAACP branches rely upon aggregated data that shows where the service disconnections occur.

5. The Saint Louis County NAACP supports many changes to the proposed rule that are being offered by the Office of Public Counsel. However, the Saint Louis County NAACP believes that utilities should be required to publish some aggregated customer data without charge so that the public generally knows where service disconnections occur.

6. The Saint Louis County NAACP supports the redlined version of the proposed rule that is being submitted by Sierra Club.

WHEREFORE, the Saint Louis County NAACP asks that the Commission take these comments into consideration as it deliberates its final Order of Rulemaking.

Respectfully Submitted,

GREAT RIVERS ENVIRONMENTAL  
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