BEFORE THE PUBLIC SERVICE COMMISSION OF THE STATE OF MISSOURI

In the Matter of KCP&L Greater Missouri Operations)
Company's 2018 Triennial Compliance Filing) File No. EO-2018-0269
Pursuant to 4 CSR 240-22)

COMMENTS OF NATIONAL ASSOCIATION FOR THE ADVANCEMENT OF COLORED PEOPLE

The National Association for the Advancement of Colored People (NAACP), pursuant to 4 CSR 240-22.080(6), submits the following comments concerning KCP&L Greater Missouri Operations Company's Integrated Resource Plan.

The Integrated Resource Plan is deficient because it contravenes the fundamental objective that KCP&L Greater Missouri Operations Company "provide the public with energy services that are safe, . . . in a manner that serves the public interest." 4 CSR 240-22.010 (2). Specifically:

The Integrated Resource Plan does not in any manner prioritize or otherwise consider access to affordable, renewable energy for persons who reside in low income or minority communities;

The Integrated Resource Plan does not in any manner prioritize or otherwise consider air quality benefits in low income or minority communities; and

The Integrated Resource Plan does not in any manner prioritize or otherwise consider minimizing localized air pollutants and greenhouse gas emissions in low income or minority communities.

This planning process presents KCP&L Greater Missouri Operations Company

with an opportunity to advance the health and well being of people of color in this State.

This 2018 Plan, however, with its over-reliance on coal-fired power, is an assault on their health and well being.

Carbon pollution fuels climate change, it triggers more asthma attacks and respiratory disease, it worsens air quality, and it contributes to more frequent, destructive, costly and deadly extreme weather events. Dirty air exacerbated by climate change disproportionately affects people of color and low income communities in Missouri and throughout the nation.

Nationwide, 68% of African Americans live within 30 miles of a coal plant and low income communities are more likely to be host to a coal plant. African American children are twice as likely as white American children to die from asthma. African American children are three times more likely to be admitted to the hospital for an asthma attack. African American adults are more likely to die of lung disease than white adults, even though they are less likely to smoke.

An adequate Integrated Resource Plan, based upon adequate and timely clean energy, would go a long way to improving the health and well-being of people of color in this state. The KCP&L Greater Missouri Operations Company Plan, with its overreliance on coal-fired power, endangers the people's health and well-being.

For the foregoing reasons, the Integrated Resource Plan is contrary to the requirement that KCP&L Greater Missouri Operations Company provide the public with energy services which are safe and in a manner which serves the public interest."

Respectfully Submitted,

/s/ Bruce A. Morrison

Henry B. Robertson (Mo. Bar No. 29502) 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 hrobertson@greatriverslaw.org bamorrison@greatriverslaw.org

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 30th day of August, 2018, to all counsel of record.

/s/ Bruce A. Morrison
Bruce A. Morrison