

which indicates on what items, if any, a hearing will be held and which establishes a procedural schedule.

II. COMMISSION CONSIDERATIONS WHEN REVIEWING ALLEGED DEFICIENCIES AND CONCERNS

4. Attached to this pleading as Exhibit A is Ameren Missouri's detailed response to each of the alleged deficiencies and concerns set forth in the parties' March 31st filings unless they have been otherwise resolved.³ This pleading will not go into the details of that response, but will address six overarching considerations that the Company asks the Missouri Public Service Commission ("Commission") to keep in mind as it considers the alleged deficiencies and concerns.

5. First, the Commission should recognize that the purpose of the IRP rules is not to reach a perfect plan with the perfect answer to every potential question. Rather, as the Commission itself stated in one of the Company's previous IRP filings, "The purpose of the IRP filing is to demonstrate that [the Company] has engaged in a planning process that complies with the requirements of the rule."⁴ More recently, the Commission has held that the focus of the rules should be "...on the planning process itself rather than on the particular plans or decisions that result from that process." As the content of Exhibit A demonstrates, Ameren Missouri has more than adequately complied with the requirements of the Commission's rules. Ameren Missouri's IRP filing reflects a thorough and robust analysis which should be found by the Commission to demonstrate compliance with the IRP rules.

³ See the *Joint Filing* filed contemporaneously with this pleading for the resolutions of various comments and concerns.

⁴ File No. EO-2007-0409, *Final Order Regarding AmerenUE's 2008 Integrated Resource Plan*, February 29, 2009, p. 1.

6. Second, the Commission must weed out the alleged deficiencies that are nothing more than a party's view of how some aspect should be valued or how some analysis should be conducted, as opposed to a deficiency in the Company's planning process. Different parties will view the planning process differently. If the Company did not undertake some required analysis, there is no doubt that would be a deficiency. However, if the alleged deficiency is that Ameren Missouri should have used a different value for a particular aspect of its analysis, or should have selected a different plan as its preferred/contingency plan, then it is not a deficiency; it is instead a difference of opinion. With the diversity of parties (and their associated agendas) involved in Ameren Missouri's IRP process, it is likely that there could not be an IRP which could gain 100% agreement. The appropriate question, as stated above, is whether the Company engaged in a planning process that complies with the requirements of the rules.

7. Third, it's important to bear in mind that while the planning horizon⁵ for the IRP is a 20-year duration, the implementation period⁶ is effectively only the three years following the filing, until the next IRP is filed. This has a two-fold effect of promoting long-term planning while allowing shorter-term adjustments. Additionally, the Commission's IRP rules contemplate an update process, set forth in 20 CSR 4240-22.080(6), including annual updates. This update process obviates the need for the Commission to order the Company to consider updating its assumptions on an ad hoc basis, as the Commission has already created a process whereby this must regularly occur.

⁵ 20 CSR 4240-22.010(43).

⁶ 20 CSR 4240-22.010(25).

8. Fourth, it is not practical for a utility to plan for all details such as exactly where resources would be placed or the details of a specific customer program that may be implemented during a 20-year planning process, which is why the Commission's resource planning rule requires utilities to analyze generic resources with generic assumptions. The preferred plan sets the direction of the utility; then those details are considered and evaluated during project implementation while selecting among competing projects.

9. Fifth, the Company suggests that the Commission consider a very pragmatic concept – it may simply not be worth the effort to make certain revisions to the analyses. Presume for a moment that Ameren Missouri's filing contains a deficiency. Before ordering Ameren Missouri to redo its analysis, the Commission should ask whether the change being proposed would change the Company's selection of its Preferred Resource Plan and, perhaps most importantly, whether it would change the Company's Implementation Plan (i.e., the Company's activities for the next three years until it files a new IRP). IRP filings under the Commission's rules represent a snapshot in time. There will always be an input that could be updated, but if re-running the analysis is not going to result in a change to the Preferred Plan selection or to the Company's Implementation Plan, then it does not make sense for the Commission to order the Company to spend its time and resources re-working that aspect of the IRP filing.

10. Sixth and finally, filed contemporaneously with this pleading is a *Joint Filing* between the parties who filed comments on March 31st, which resolves the vast majority of issues raised. While there are remaining concerns, none of them rise to a level that would make the Company's IRP analysis flawed.

WHEREFORE, Ameren Missouri asks the Commission to find that its September 27, 2020, IRP filing complies with the requirements of 20 CSR 4240-22, and acknowledge the Company's Preferred Resource Plan as reasonable at this time.

Respectfully submitted,

UNION ELECTRIC COMPANY,
d/b/a AMEREN MISSOURI

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CERTIFICATE OF SERVICE

The undersigned hereby certifies that a true and correct copy of the foregoing Ameren Missouri Response to Alleged Deficiencies and Concerns was served on all parties of record via electronic mail (e-mail) on this 18th day of June, 2021.

/s/ Wendy K. Tatro _____
Wendy K. Tatro