

**BEFORE THE PUBLIC SERVICE COMMISSION
OF THE STATE OF MISSOURI**

In the Matter of Ameren Missouri’s 2020)
Utility Resource Filing pursuant to 20 CSR) File No. EO-2021-0021
4240 – Chapter 22.)

**AMEREN MISSOURI’S RESPONSE REGARDING DETAILED ANALYSIS REQUIRED
BY THE COMMISSION’S ORDER REGARDING
2020 INTEGRATED RESOURCE PLAN**

COMES NOW Union Electric Company d/b/a Ameren Missouri ("Ameren Missouri" or the "Company"), and in response Ordering ¶4 of the Commission’s August 18, 2021 *Order Regarding 2020 Integrated Resource Plan* (the "Order") issued in File No. EO-2021-0021, states as follows:

1. Ameren Missouri made its Chapter 22 Integrated Resource Plan ("IRP")¹ filing on September 27, 2020. See File No. EO-2021-0021.
2. On March 31, 2021, parties in that case filed pleadings alleging certain deficiencies and raising concerns regarding the compliance of Ameren Missouri’s filing with the applicable rules.
3. On June 11, 2021, the Company and intervenor Sierra Club filed a Stipulation and Agreement in that case resolving Sierra Club’s alleged deficiencies or concerns.
4. On June 18, 2021, all parties to the IRP docket filed a Joint Filing resolving most of the other alleged deficiencies and concerns raised by the parties.
5. One of the concerns unresolved by the above-referenced Stipulation and Joint Filing was Staff Concern (C), which Staff stated to be the "risk potentially borne by ratepayers from

¹ 20 CSR 4240-22.080.

Ameren Missouri’s unprecedented shift to new renewable and solar generation.”² As a remedy for Staff’s stated concern, Staff suggested that the Commission direct Ameren Missouri to “provide detailed analysis comparing ratepayer risks and shareholder risks for additional generation resources, which are not required to meet federal, state, or MISO requirements.”³

6. After considering the above-referenced Stipulation, the Joint Filing and other filings of the parties respecting alleged deficiencies and concerns, the Commission determined that the Company’s 2020 IRP filing complied with the Commission’s IRP rules, but it also required the Company to provide the analysis Staff had suggested respecting Staff Concern (C) not in the IRP docket but instead as part of Ameren Missouri’s next IRP Annual Update.

7. Given that the Annual Update was due just approximately six weeks after the Order was issued and owing to the additional time needed to prepare the required analysis, the Company filed a Motion for Reconsideration in the IRP docket limited to the requirement of Ordering ¶ 4. Ameren Missouri’s motion requested additional time to complete and file the analysis. The Commission granted reconsideration to that extent, allowing the filing of the required analysis by December 15, 2021.⁴

8. Attached hereto as Exhibit A is a report reflecting the bases and results of the additional analysis. Workpapers underlying the additional analysis are being provided to the parties to this docket concurrently with this filing.

² Staff Report on Union Electric Company d/b/a Ameren Missouri Electric Utility Resource Planning Compliance Filing, File No. EO-2021-0021, p. 3. Because the Order required the analysis be filed in the Annual Update docket and since the Commission ordered no additional action in the IRP docket, Ameren Missouri is making this filing in this Annual Update docket.

³ Order, p. 4 (quoting the above-referenced Staff Report).

⁴ *Order Extending Time for Ameren Missouri to Provide Additional Analysis*, File No. EO-2021-0021 (Sept. 23, 2021).

WHEREFORE, Ameren Missouri hereby submits the additional analysis in compliance with the Order.

Respectfully submitted,

/s/ James B. Lowery

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CERTIFICATE OF SERVICE

The undersigned hereby certifies that a true and correct copy of the foregoing was served on all parties of record via electronic mail (e-mail) on this 15th day of December, 2021.

/s/ James B. Lowery _____
James B. Lowery