

FERC's subsequent approval. On July 1, 2022, the District Court held a hearing on Ameren Missouri's request to modify the Remedy Order to allow for interim operations while various reliability projects approved by MISO are addressed. Ameren Missouri is seeking approval from the District Court to continue operating, on a reduced basis, until such time as the mitigation projects are completed. The Department of Justice, relying upon the District Court's "inherent equitable power", filed a motion seeking unspecified "mitigation" for what it deems "excess emissions" from Rush Island. Ameren Missouri believes such request to be without merit considering the decision by the Court of Appeals for the Eight Circuit in this case, as well as prior appellate decisions.

4. The District Court has ordered the parties to confer and propose, if possible, an Agreed to Stipulated Order regarding interim operations. Absent a joint agreement, the parties will submit on July 15, 2022, separate orders to the Court for consideration. A status hearing has been scheduled for August 8, 2022.

Rush Island Energy Center Retirement Planning Update

5. Transmission Planning – As reported in the previous reports filed in this docket, Ameren Missouri has spent the last several months providing information to MISO as needed for the Attachment Y2 and Y analyses. The final Attachment Y Report has been issued and the needed reliability projects have been approved. The transmission project management team is starting work on the design process, consistent with the pre-engineering work already done. As previously reported, the projects that must be completed before Rush Island can be retired are as follows:

- Installation of a larger transformer at Ameren Missouri's Wildwood substation.
- Installation of a capacitor bank at Ameren Missouri's Overton Substation, and
- Installation of four Static Compensators (STATCOM) in and around the St. Louis region.

Also as reported previously, there are certain other projects to be completed to meet Ameren Missouri's local transmission planning criteria with the retirement of Rush Island, but the Rush Island retirement will be independent of these projects going into service:

- Reconductoring 50 miles of conductor on the 345 kV Coffeen to Roxford transmission line,
- Retap the breaker current transformers at the 138kV substation and install new line metering set on the transmission line to Spalding,
- Raising two structures on the 138kV Neoga-Effingham Northwest transmission line and installing new shunts on the entire line, and
- Constructing a new 138kV transmission line from Beehive to Dupo Ferry and expanding the capacity of the existing Ameren Illinois Dupo Ferry and to Beehive substations to accommodate the new line.

6. Operational Planning – The Company continues to work on multiple operational issues that will have to be addressed both during the transition and after retirement of the plant, including creating staffing plans, appropriately adjusting operations and maintenance expenditures and capital investment to reflect retirement of the plant, inspecting remaining inventory to see what is usable elsewhere, and making plans to leave equipment at the plant in safe condition (draining oil, water, etc.), to name a few. Ameren Missouri started with the shutdown plans it developed for the Meramec Energy Center and is modifying them for Rush Island. The Company has made progress on this work, but the final structure of these plans depends upon knowing the new Rush Island retirement date and on how the facility will operate until retirement, which the Company cannot know until it receives a modified order from the District Court.

Staff Specific Recommendations from its April 15th Report

7. Staff recommended Ameren Missouri update its existing tariffs which cover curtailment situations. The Company filed a new tariff, titled Emergency Energy Conservation Plan, with the Commission on June 10, 2022, as a replacement for its existing Coal Conservation Tariff. This tariff describes how the Company will comply with specified MISO and North America Electric Reliability Corporation ("NERC") procedures, as well as its own procedures and

plans which it is required by NERC to maintain. Some of the actions are required by MISO or NERC and others will be taken when deemed necessary by the Company. The tariff also includes provisions for notification of Staff as specific events occur. This case is still pending before the Commission as the Office of the Public Counsel has requested additional time to review the tariff language. The Staff has recommended the tariff (modified in one respect by a substitute tariff sheet that has been submitted) be approved.

8. Staff also recommended that "Ameren Missouri begin developing specific plans to minimize risk to the St. Louis Metro area." As stated in its previous reports, the Company is and has been looking to identify specific steps to minimize reliability risk to all of its territory, but since the identified reliability risks are in the St. Louis metro area, the bulk of its work has focused on mitigation needs for the St. Louis metro. This is the focus of the MISO Y2 and Y processes and of the mitigation measures necessary to address the identified concerns. Ameren Missouri believes it has always focused on this aspect but if Staff has more specific concerns that it would like addressed, the Company welcomes a conversation with the appropriate personnel.

9. Staff also recommended the Company examine its demand response programs and other load management programs to mitigate reliability concerns. Ameren Missouri's transmission planning group looked at the specific locations which have reliability risk as identified in the MISO Attachment Y2 and Attachment Y Reports. Again, the Company does not believe that demand response or other load management is a viable, non-emergency solution to these specific problems. To avoid losing the substation in Wildwood, for example, the Company would have to have a program that removed all load from that substation. Which would have the same impact as the reliability event itself, meaning it is not a viable solution.

WHEREFORE, Ameren Missouri requests the Missouri Public Service Commission accept this filing as compliant with the order to file monthly status reports.

Respectfully submitted,

/s/ Wendy K. Tatro

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CERTIFICATE OF SERVICE

The undersigned hereby certifies that the foregoing was served on the Missouri Public Service Commission Staff and the Office of the Public Counsel via electronic mail (e-mail) or via regular mail on this 15th day of June, 2022.

/s/ Wendy K. Tatro
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