

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

In the Matter of the Application of Union Electric)	
Company d/b/a Ameren Missouri for Permission and)	
Approval and a Certificate of Public Convenience and)	File No. EA-2019-0181
Necessity Authorizing it to Construct a Wind Generation)	
Facility.)	

**MOTION TO AMEND ORDER APPROVING
STIPULATION AND AGREEMENT**

COME NOW Union Electric Company d/b/a Ameren Missouri ("Ameren Missouri" or the "Company") and the Missouri Department of Conservation ("MDC"), (collectively, the "Movants"), and for their motion to amend the Commission's August 15, 2019 *Order Approving Stipulation and Agreement* (the "Stipulation") state as follows:

1. Item 6 in Exhibit A to the Stipulation calls for Ameren Missouri and MDC to work in good faith to reach agreement on a pilot study and provided that such agreement was to occur within nine months of the issuance of the Commission's Certificate of Convenience and Necessity ("CCN"). The CCN was effective August 25, 2019, meaning that as written, Item 6 calls for the nine-month period to reach agreement on the pilot study will end on May 25, 2020.

2. Ameren Missouri and MDC are working in good faith as contemplated by Item 6. However, given the nature of various federal regulatory requirements, Ameren's internal controls required for such a project, the potential pilot being discussed, and the fact that Ameren Missouri is not expected to take ownership of the facility until late in 2020, it is not practical to complete negotiations on the pilot study and then complete the study within the timeframe provided in Item 6. For these reasons, Ameren Missouri and MDC have agreed that it makes more sense to amend their agreement so that it reads as follows:¹

¹ Deletions from original in []; additions in **boldface** type.

Within [nine] **twenty-four** months of the issuance of a Certificate of Convenience and Necessity in this case, the Company and MDC will work in good faith to reach agreement on a pilot study to evaluate the effectiveness of informed curtailment technology to minimize raptor collisions using some of the Project's turbines. The study will finish within [the first] six years [of the Project's operation] **from the commencement date agreed upon by the Company and MDC**. The study would include providing MDC or its contractors access to the Project area as reasonably needed to conduct the study. The study would likely involve a camera-based detection system to facilitate turbine shutdown in the presence of raptors and/or it may involve tracking raptor movement and behavior with GPS-telemetered birds in or near the Project area. The study will likely compare "treatment" turbines that use the informed curtailment technology with turbines that do not use the technology. The pilot study is subject to MDC securing the necessary funds for such study.

3. Movants state that they have inquired of all other parties to this case, each of which have indicated that they have no objection to the Commission granting this motion.

WHEREFORE, Ameren Missouri and MDC request that the Commission issue its order amending the Stipulation as requested herein.

Respectfully submitted,

**UNION ELECTRIC COMPANY
d/b/a Ameren Missouri**

/s/ James B. Lowery

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**MISSOURI DEPARTMENT OF
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CERTIFICATE OF SERVICE

The undersigned certifies that true and correct copies of the foregoing have been e-mailed or mailed, via first-class United States Mail, postage pre-paid, to counsel of record this 24th day of April, 2020.

/s/ James B. Lowery
James B. Lowery