

**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 4240 – Chapter 22.) File No. EO-2021-0021
)

**SUBMISSION OF RESULTS OF ANALYSIS
UNDER STIPULATION AND AGREEMENT**

COMES NOW Union Electric Company d/b/a Ameren Missouri ("Company" or "Ameren Missouri"), and as called for by the June 11, 2021 *Stipulation and Agreement Regarding Sierra Club Issues* (“Stipulation”), hereby submits the results of the analysis described therein and, in this regard, states as follows:

1. As outlined in the Stipulation, Ameren Missouri agreed to perform certain analysis in resolution of the Sierra Club’s issues in this docket and to file the results of the analysis, on a Highly Confidential basis subject to the Protective Order issued in this case, within 90 days of the date of the Stipulation.

2. The detailed workpapers showing the assumptions and results of the analysis are voluminous and are being provided to Sierra Club, Staff, and the Office of the Public Counsel outside of this filing.¹ A summary of the assumptions, the analysis that was done, and its results is attached to this Submission as Exhibit A and is hereby incorporated herein by this reference.

3. As indicated by the Stipulation, the conduct of the analysis does not mean Ameren Missouri agrees that the analysis was required by any existing order or that the assumptions and inputs that underlie it are reasonable. To the contrary, Ameren Missouri, as outlined in its prior filings in this docket, takes issue with the premises that underlie Sierra Club’s desire that the analysis be conducted in the manner it suggested.

¹ Other parties to this docket can request the workpapers, subject to the protective order.

4. Among Ameren Missouri's concerns with the analysis and the approach to renewable buildout inherent in it, as suggested by Sierra Club, is that it would require a premature commitment to very large amounts of battery technology, raising significant concerns both about the cost and feasibility of executing any such commitment. This includes prematurely committing to additions in the early stages of technology maturation when costs are higher. Such a commitment also ignores relevant constraints on labor, materials, and equipment.

5. While significantly more work would be necessary to understand this with a high level of certainty, the suggested approach is likely insufficient to ensure system reliability even if the hurdles discussed in ¶ 4 could be overcome. In Ameren Missouri's view, the technology has simply not advanced to a state where it can provide the needed reliability services.

6. The approach suggested by Sierra Club also likely significantly understates the extent of needs for new transmission system infrastructure in the absence of baseload energy centers necessary to provide grid support in this timeframe.

7. Even if the foregoing issues could be overcome, the approach ignores cost and financial impacts, such as the overall cost and rate impacts it would cause and the fact that the capital commitments severely impact the Company's credit metrics. Such an approach also does not provide the ability to monitor and adjust to the uncertain reliability characteristics of the technologies involved, does not provide the ability to clearly identify the need for our resource technologies to fill identified gaps, and does not allow sufficient time for needed changes in market constructs and mechanisms to ensure overall system reliability at a reasonable cost.

WHEREFORE, Ameren Missouri submits the results of the analysis agreed upon in the Stipulation.

Respectfully submitted,

/s/ James B. Lowery

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CERTIFICATE OF SERVICE

I hereby certify that copies of the foregoing have been emailed to the parties of record on this 9th day of September, 2021.

/s/ James B. Lowery
James B. Lowery