

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

In the Matter of the Determination of Special)
Contemporary Resource Planning Issues to be)
Addressed by Ameren Missouri in its Next) File No. EO-2022-0054
Triennial Compliance Filing or Next Annual)
Update Report.)

**AMEREN MISSOURI'S COMMENTS ON THE PROPOSED LIST OF
SPECIAL CONTEMPORARY ISSUES**

COMES NOW Union Electric Company d/b/a Ameren Missouri ("Ameren Missouri" or "Company") and, pursuant to 20 CSR 4240-22.080(4)(B), submits to the Missouri Public Service Commission ("Commission") the following Comments on the Proposed List of Special Contemporary Issues:

1. 20 CSR 4240-22.080(4) requires Missouri's electric utility companies to consider and analyze "special contemporary issues" in their Integrated Resource Plan ("IRP") triennial compliance filings and in their annual IRP update reports. On August 26, 2021, the Commission issued its *Order Opening a File Regarding Special Contemporary Resource Planning Issues and Offering an Opportunity to File Suggestions ("Order Opening File")*. On September 15, 2021, the Staff of the Missouri Public Service Commission ("Staff"), the Office of the Public Counsel, Renew Missouri Advocates, and the Sierra Club filed proposed special contemporary issues for Ameren Missouri to address.

2. The language of 20 CSR 4240-22.080(4) provides that the purpose of the special contemporary issues list is "... to ensure that evolving regulatory, economic, financial, environmental, energy, technical, or customer issues are adequately addressed by each utility in its electric resource planning." In addition, the Rule provides that "[e]ach special contemporary issues list will identify new and evolving issues, but may also include other issues such as

unresolved deficiencies or concerns from the preceding triennial compliance filing.” 20 CSR 4240.080(4).

3. Ameren Missouri has reviewed the special contemporary issues lists proposed by the other parties and, as set forth in Attachment A, believes that some of the issues proposed by the parties offer enough value to warrant inclusion in the Company’s next annual update. However, Ameren Missouri suggests some of these issues do not merit treatment as special contemporary issues, most of which fall under a few general categories. First, several of the suggested special contemporary issues are items that are not typically part of long-term resource planning and thus are not appropriate to be addressed in this docket. Second, several other suggested special contemporary issues involve concepts or issues that have already been addressed by the Company in recent IRP filings. Finally, Ameren Missouri notes that a few of the issues suggested do not offer sufficient value as compared to the time and resources necessary to undertake such work while simultaneously completing analysis required by the Commission IRP rules.

4. With this in mind, Ameren Missouri submits Attachment A with this pleading, representing its comments on the proposed list of special contemporary issues. Ameren Missouri looks forward to continuing to work with stakeholders to address the issues presented in this docket.

5. In addition to Staff’s proposed special contemporary issues, Staff has suggested that the Commission require Ameren Missouri to address Staff’s proposed special contemporary issues not in its next annual update as provided for in the Commission IRP rules, but rather in a separate update to be filed by December 15, 2021. Ameren Missouri objects to the idea of an additional update report beyond the triennial IRP and annual updates already provided for in the Commission IRP rules. The Commission has established its preferred frequency for IRP filings as part of those

rules, and Staff has not presented good cause for the Commission to deviate from that reporting frequency.

6. According to the Commission IRP rules, the Commission must issue an order no later than November 1st listing those special contemporary issues it is requiring the utility to address in its next triennial IRP filing or annual update. The Company's next IRP annual update is due by October 1, 2022. Ameren Missouri recommends the Commission continue to adhere to the existing process for establishing and addressing special contemporary issues as it has since the rules for IRP filing requirements were revised in 2011.

WHEREFORE, Ameren Missouri submits its attached comments on the proposed list of special contemporary issues and requests.

Respectfully Submitted,

**UNION ELECTRIC COMPANY
D/B/A AMEREN MISSOURI**

/s/ Wendy K. Tatro

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CERTIFICATE OF SERVICE

I do hereby certify that a true and correct copy of the foregoing document has been hand-delivered, transmitted by e-mail or mailed, First Class, postage prepaid, this 1st day of October, 2021, to counsel for all parties on the Commission's service list in this case.

/s/ Wendy K. Tatro
Wendy K. Tatro