

BEFORE THE MISSOURI PUBLIC SERVICE COMMISSION

In the Matter of the Application of Union)
Electric Company d/b/a Ameren Missouri for)
Approval of a Subscription-Based Renewable) File No. EA-2022-0245
Energy Program.)

POSITION STATEMENT OF
THE MISSOURI INDUSTRIAL ENERGY CONSUMERS

COMES NOW the Missouri Industrial Energy Consumers (“MIEC”) and provides its Statement of Positions as follows:

Issue A. Does the evidence establish that the 150 megawatt (“MW”) solar generation facility to be constructed in White County, Illinois (the “Boomtown Solar Project” or “Project”) for which Ameren Missouri is seeking a certificate of convenience and necessity (“CCN”) necessary or convenient for the public service?

- 1. Should the Commission find that the Project satisfies the first *Tartan* Factor of need?**
- 2. Should the Commission find that the Project satisfies the second *Tartan* Factor of economic feasibility?**
- 3. Should the Commission find that the Project satisfies the third *Tartan* Factor of ability to finance?**
- 4. Should the Commission find that the Project satisfies the fourth *Tartan* Factor of qualified to construct?**

5. Should the Commission find that the Project is in the public interest and satisfies the fifth *Tartan* Factor?

Yes, the evidence shows that Ameren Missouri should be granted a CCN for the Boomtown Solar Facility Project. The Company states that it needs 2,800 MW of new renewable resources by 2030 and 5,400 MW of new renewable generation by 2039. Ameren Missouri's long-term planning includes the retirement of coal-fired facilities and the consequent reduction in greenhouse gas emissions. The Boomtown Solar Project, as proposed to be combined with the Company's proposed Renewable Solutions Program ("RSP"), will help meet these needs.

Ameren Missouri and other utilities should not assume that they can easily or quickly build or contract for renewable projects. There is significant competition for renewable facility siting and equipment -- utilities and consumers are increasingly seeking these scarce resources. Project development can take years, and if a project is optioned, the failure to timely execute on that option allows other interested parties to acquire the site, equipment and permits. Failure to act when sites and equipment are available may result in lost opportunities, and a workable schedule may not be recoverable later.

Issue B. If the Commission grants the CCN for the Boomtown Solar Project, what conditions, if any, should the Commission impose on the CCN?

The CCN should be approved with the understanding that it goes hand in hand with the RSP, which is key to the Project benefits. The RSP reduces costs to non-subscribing customers because customers must pay a fixed charge that is higher than the cost of the Boomtown Solar Facility, and the obligation to pay the subscription fee is a 15-year obligation. The RSP will also likewise subscribers by helping them to reach their greenhouse gas (GHG) emission reduction goals, which will in turn promote Missouri's economic development.

Issue C. Is this an appropriate proceeding for the Commission to review Ameren Missouri's Renewable Solutions Program? If so, should the Commission approve the Renewable Solutions Program proposed by Ameren Missouri in accordance with its authority to approve utility programs and tariffs?

Yes, the current proceeding is the appropriate proceeding for the Commission to review the RSP because Boomtown Solar Facility and the RSP are integrally related regarding planning, need, and system and customer benefits.

Issue D. If the Commission approves the Renewable Solutions Program proposed by Ameren Missouri, what, if any, conditions should the Commission impose on such approval?

The Commission should reduce the Renewable Resource Charge (“RRC”) to subscribers by 5 percent to reflect Ameren Missouri’s revised submission, which demonstrates an additional \$15.7 million in benefits from the Company’s initial submission. Ameren’s initial submission was revised to use production tax credits rather than investment tax credits to calculate the benefit of the Project. As a result of this revision, the benefits of the Project increased by \$15.7 million on a net present value basis. As currently proposed, only non-subscribing customers would receive the value of this \$15.7 million benefit. MIEC recommends that the Commission reduce the annual RRC by at least 5 percent, which would reflect at least 50 percent of this \$15.7 additional benefit.

Respectfully submitted,

Curtis, Heinz, Garrett & O'Keefe, P.C.

By: /s/ Diana M. Plescia

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Industrial Energy Consumers

CERTIFICATE OF SERVICE

I do hereby certify that a true and correct copy of the foregoing document has been emailed this day to all parties on the Commission's service list in this case.

/s/ Diana M. Plescia