

**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-2019-0021
Necessity Authorizing it to Construct a Wind Generation	)	
Facility.	)	

**RENEW MISSOURI'S  
STATEMENT OF POSITIONS**

COMES NOW Renew Missouri Advocates d/b/a Renew Missouri ("Renew Missouri"),  
and offers its *Statement of Positions*:

**Issue 1:       Should the Commission grant the certificate of convenience and necessity ("CCN") and merger approval sought by the Company's application in this docket or reject it?**

**Renew Missouri Position**

The Commission should grant Ameren Missouri's requested CCN under Section 393.170.1 RSMo and authority to merge pursuant to Section 393.190.1 RSMo. Here, the pre-filed evidence shows that this project is necessary or convenient for the public service because it will be used to by Ameren Missouri (sometimes referred to as "the Company") to comply with Missouri's Renewable Energy Standards ("RES").<sup>1</sup> Furthermore, in addition to satisfying a statutory requirement, this project allows the Company to offer its customers the best value for low-cost, renewable energy by combining the 1.25 Renewable Energy Credit "addor" for projects located in Missouri and pursuing a schedule that maximizes the federal production tax credits.<sup>2</sup> These financial benefits are further bolstered by the general benefits of wind generation including lower fuel costs, lower operation and maintenance ("O&M") expenses, and lower emissions.<sup>3</sup> In

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<sup>1</sup> Michels Direct, pp. 2-4.

<sup>2</sup> Michels Direct, p. 3; Owen Surrebuttal, p. 8.

<sup>3</sup> Owen Surrebuttal, p. 8.

addition, this project will generate significant economic benefits including 200 construction jobs, five-to-eight permanent jobs, and landowner lease payments.<sup>4</sup> For these reasons, this project is necessary, convenient, and serves the public interest and so the Commission should issue an order granting the requested relief.

**Issue 2: If the Commission approves the CCN and merger approval sought by the Company's application in this docket, what conditions, if any, should the Commission impose?**

Renew Missouri Position

The Commission should impose the conditions listed in the *Second Stipulation and Agreement* filed on February 11<sup>th</sup>.<sup>5</sup>

WHEREFORE, Renew Missouri submits its *Statement of Positions*.

Respectfully Submitted,

/s/ Tim Opitz

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Certificate of Service

I hereby certify that copies of the foregoing have been mailed, emailed or hand-delivered to all counsel of record this 13<sup>th</sup> day of February 2019:

/s/ Tim Opitz

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<sup>4</sup> Owen Surrebuttal, p. 8; Hyman Rebuttal, p. 4; Arora Direct, p. 25.

<sup>5</sup> Doc. No. 73.