

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

In the Matter of Union Electric Company d/b/a Ameren     )  
Missouri’s Tariffs to Decrease Its Revenues for     )     File No. ER-2019-0335  
Electric Service.     )

**RENEW MISSOURI’S STATEMENT OF POSITIONS**

COMES NOW Renew Missouri Advocates (“Renew Missouri”) and offers the following statement of positions:

**Issue 1:     Unit Commitments**

**a. Should any disallowance be ordered because of Ameren Missouri's unit commitment practices?**

Renew Missouri Position:

Renew Missouri did not file testimony on this issue but reserves the right to base a final position on the evidence presented at hearing.

**Issue 2:     Coal Plants and Long-Term Planning**

**a. Should the Commission refuse to allow recovery of capital costs incurred at the Rush Island, Labadie, and Sioux Energy Centers during the test year or true-up period established for this case?**

Renew Missouri Position:

Renew Missouri did not file testimony on this issue but reserves the right to base a final position on the evidence presented at hearing.

**b. Should a rigorous economic assessment as outlined in Sierra Club witness Avi Allison's surrebuttal testimony (page 3, lines 14-19) be required apart from the analyses to be submitted by Ameren Missouri in its 2020 triennial integrated resource planning case?**

Renew Missouri Position:

Renew Missouri did not file testimony on this issue but reserves the right to base a final position on the evidence presented at hearing.

**Issue 3: Fuel Adjustment Clause ("FAC")**

**a. What is the appropriate sharing mechanism between the company and customers for costs recovered through the FAC?**

Renew Missouri Position:

Renew Missouri did not file testimony on this issue but reserves the right to base a final position on the evidence presented at hearing.

**Issue 4: Affiliate Transactions**

**a. Should OPC's recommended disallowance of approximately \$218 million in Ameren Services Company costs be adopted?**

Renew Missouri Position:

Renew Missouri did not file testimony on this issue but reserves the right to base a final position on the evidence presented at hearing.

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

Respectfully Submitted,

/s/ Tim Opitz

Tim Opitz, Mo. Bar No. 65082  
409 Vandiver Drive, Building 5, Ste. 205  
Columbia, MO 65202  
T: (573) 825-1796  
F: (573) 303-5633  
tim@renewmo.org

Certificate of Service

I hereby certify that copies of the foregoing have been mailed, emailed or hand-delivered to all counsel of record this 24<sup>th</sup> day of February 2020:

/s/ Tim Opitz

---