

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

In the Matter of Ameren Missouri's Request for a Variance )  
Regarding its Renewable Energy Standard Compliance. ) Case No. EE-2020-0411

**AMEREN MISSOURI'S RESPONSE TO  
STAFF SUPPLEMENTAL RECOMMENDATION**

**COMES NOW** Union Electric Company d/b/a Ameren Missouri (Ameren Missouri or the Company), and for its response to the above-referenced Staff Supplemental Recommendation (Staff Recommendation) states as follows:

1. The Company agrees, with respect to its 2019 RES Compliance Report, that it does not require a variance from 20 CSR 4240-20.100(8)(A)1.J. While in the past the Company may not have possessed all the information needed to comply in full with that regulation (which prompted its variance request in this docket), the Company agrees that for 2019 it has the information and it has provided it in its 2019 RES Compliance Report.

2. The Company notes, however, that it is likely it will continue to request variances from the regulations that are the subject of this docket in future compliance years for the same reasons given in this docket, and that a variance from 20 CSR 4240-20.100(8)(A)1.J could be necessary if in the future the Company lacks all the necessary information for compliance.

WHEREFORE, Ameren Missouri renews its request that the Missouri Public Service Commission grant it variances from the provisions of 20 CSR 4240-20.100(8)(A)1I(I) – (V).

Respectfully submitted,

**/s/ James B. Lowery**

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**CERTIFICATE OF SERVICE**

The undersigned certifies that a true and correct copy of the foregoing document was sent by electronic transmission, facsimile or email to all counsel of record on this 10<sup>th</sup> day of August, 2020, to the Missouri Public Service Commission Staff and to the Office of the Public Counsel.

\_\_\_\_\_/s/ James B. Lowery\_\_\_\_\_  
James B. Lowery