

**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 Approval of a )  
Subscription-Based Renewable )  
Energy Program )

**File No. ER-2022-0245**

**SIERRA CLUB’S STATEMENT OF POSITION**

Sierra Club, by and through counsel, provides this Statement of Position, with issues labeled according to the Proposed List of Issues filed by Staff on January 24, 2023. Sierra Club reserves the right to modify its positions or to take additional positions as the case proceeds.

- 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?

Sierra Club respectfully asserts that Ameren Missouri should be granted a CCN for the Boomtown solar project and that record evidence in this case will show that all five of the *Tartan* factors have been satisfied. In support of these positions, Sierra Club offers these summary points.

First, energy is a foundational component of electrical service. Any interpretation of “need” under the *Tartan* factors must be founded on the fact that customers need electric energy,

in addition to other services such as capacity and electric grid stability. The Commission should find that need is not defined strictly by whether a resource meets the Company's firm capacity needs, but also by whether it can economically meet the Company's energy needs and need for a hedge against high fuel prices. Further, in the analysis of need, the Commission should also consider how a project will impact the Company's risk exposure, including to market energy and to volatile fossil fuel prices, and the benefit of diversifying its fleet away from heavy reliance on coal. Ameren Missouri will have no choice but to replace its coal generation in the coming years as those units approach the end of their useful lives and, while the precise timing of that transition remains unknown, Ameren's customers will benefit by diversifying its generation fleet today. Customers will always have a need for economic and reliable low-cost energy, and for resources that move Ameren's electricity system towards lower-risk energy resources.

Second, Boomtown generation will displace generation from other generators every day that it operates, and will therefore benefit customers by reducing exposure to fuel price risk and while also reducing environmental pollution. Since solar is a low marginal cost resource, it displaces more expensive fossil fuel generation on the grid, which ultimately drives down the cost of market energy used to meet the Company's energy needs. Specifically, Ameren bids solar into the MISO market with a dispatch cost of zero. Since MISO's dispatch model is a least-cost economic-based algorithm, MISO will dispatch solar PV and all other zero marginal cost resources first. Those MWh added to the grid from solar will necessarily result in the reduction of MWh generated from the most expensive resources on the system. Those displaced MWh will generally come from expensive and aging oil, gas, and coal generators. Boomtown will also benefit ratepayers by reducing the risk associated with market exposure and fuel price volatility

and will reduce and avoid Company spending on fuel costs, operation and maintenance (O&M) costs, and capital at its aging fossil plants.

Third, Boomtown will also meet a “need” of customers for a hedge against fuel price volatility. Solar serves as a hedge against market energy and fossil fuel prices, which are increasingly volatile and costly. Solar plants require no fuel and minimal variable operations and maintenance; therefore, the cost of the project will be stable and locked in. This can be critical when unplanned maintenance or other types of outages occur at Ameren’s existing resources, and replacement energy or fuel is costly.

Fourth, the Boomtown project will have significant capacity value. Stand-alone solar has significant capacity value in spring, fall, and especially summer, which remains a period of significant risk to the system. Stand-alone solar also provides some capacity in the winter, and when battery storage is added in the future, the firm contribution of solar in the winter will increase.

Last, other policy and risk-minimization reasons that support the Commission’s approval of a CCN for the Boomtown project are stated in the Direct Testimony of Sarah Shenstone-Harris that has been pre-filed in this matter.

\* \* \*

Respectfully submitted,

Date: January 27, 2023

/s/ Bruce A. Morrison  
Bruce A. Morrison (Mo Bar No. 38359)  
Great Rivers Environmental Law Center  
319 N. 4<sup>th</sup> Street, Suite 800  
St. Louis, MO 63102  
(314) 231-4181  
bamorrison@greatriverslaw.org

*Attorney for Sierra Club*

**CERTIFICATE OF SERVICE**

The undersigned hereby certifies that the foregoing Statement of Position was electronically filed on this date via the Missouri PSC's electronic filing system. Notice of this filing will be served upon all parties of record who have registered through this electronic filing system.

Date: January 27, 2023

*/s/ Bruce A. Morrison*