

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	)	File No. EA-2019-0021
Approval and a Certificate of Convenience and	)	
Necessity Authorizing it to Construct a Wind	)	
Generation Facility	)	

**SIERRA CLUB’S STATEMENT OF POSITION**

Comes now Sierra Club and, pursuant to the Commission’s Order Adopting Procedural Schedule and the List of Issues filed by the parties, states the following positions.

**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?**

The Commission should grant the CCN and approve the merger with the Brickyard Hills Project pursuant to the Build-Transfer Agreement. Ameren has satisfied the *Tartan* criteria, as no party has contested (the Counties do not apply the *Tartan* criteria). The project is in the public interest, more than the power purchase agreement advocated by the Counties. Customers will benefit from a longer-term generating asset and the financial and operational benefits of full ownership.

**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?**

The CCN should include the conditions agreed by Ameren and the Department of Conservation for the protection of bald eagles in “Exhibit A to Second Stipulation.”

The Commission should also impose the other conditions agreed in the Second EDF  
Stipulation and Agreement.

Respectfully submitted,

/s/ Henry B. Robertson  
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#### **CERTIFICATE OF SERVICE**

I hereby certify that a true and correct PDF version of the foregoing was filed on  
EFIS and sent by email on this 13th day of February, 2019, to all counsel of record.

/s/ Henry B. Robertson  
Henry B. Robertson