

**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          )     File No. EA-2022-0245  
For Approval of a Subscription-based            )  
Renewable Energy Program                      )

**POSITION STATEMENT OF  
WALMART INC.**

COMES NOW Walmart Inc. (“Walmart”), and for its Position Statement, respectfully states:

- 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?

**Position:**     **The evidence supports a Commission finding that the project meets the requirements for a CCN. The CCN is a necessary component in the proposed Renewable Solutions Program (“RSP”) that brings new renewable resources to Ameren’s system supported by binding commitments from customers with firm demand. The fact that this program is already fully subscribed makes it clear that eligible customers not only want to participate in the RSP but are also interested in utility-offered renewable programs as an important pathway to meeting their renewable energy needs (Teague Surrebuttal, p. 3).**

**Walmart has long had aggressive and significant company-wide renewable energy goals, and on September 21, 2020, Walmart announced new targets, including: (1) to be supplied 100 percent by renewable energy by 2035 and (2) zero carbon emissions in its operations, including its transportation fleet vehicles, without the use of offsets by 2040. Walmart has also set a goal to transition to low-impact refrigerants for cooling and electric equipment for heating by 2040 (Teague Rebuttal, p. 3). Walmart pursues various pathways to meet its renewable energy goals depending on cost, risk, and operational factors for a particular location (Teague Surrebuttal, p. 3). Here, Walmart is among the customers that have already made a commitment to capacity under the RSP as a step toward meeting its goals. The Commission should approve the requested CCN to allow the RSP to move forward.**

B. If the Commission grants the CCN for the Boomtown Solar Project, what conditions, if any, should the Commission impose on the CCN?

**Position: Walmart takes no position on this issue at this time.**

C. Is this an appropriate proceeding for the Commission to review Ameren Missouri's Renewable Solutions Program?

1. If so, should the Commission approve the Renewable Solutions Program proposed by Ameren Missouri in accordance with its authority to approve utility programs and tariffs?

**Position: Walmart supports the approval of the Company's proposed Renewable Solutions Program in this docket (Teague Rebuttal, p. 5).**

D. If the Commission approves the Renewable Solutions Program proposed by Ameren Missouri, what, if any, conditions should the Commission impose on such approval?

**Position: Walmart recommends changing the tariff language in the proposed RSP Rider to reflect the Company's proposal to retire RECs on the customer's behalf (Teague Rebuttal, p. 5, 10).**

WHEREFORE, Walmart respectfully submits its Position Statement.

Respectfully,

**/s/ Tim Opitz**

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ATTORNEY FOR WALMART INC.

Certificate of Service

I hereby certify that copies of the foregoing have been mailed, emailed or hand-delivered to all counsel of record this 27<sup>th</sup> day of January 2023:

**/s/ Tim Opitz**

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