## **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 Electric Service)

Case No ER-2019-0335

## MISSOURI INDUSTRIAL ENERGY CONSUMERS' STATEMENT OF POSITIONS

COMES NOW the Missouri Industrial Energy Consumers ("MIEC") and for its Statement of Positions states as follows:

 On the Issue denominated 7.b. in the Status Report, Motion for Clarification of Hearing Schedule, Order of Opening Statements, and List of Issues, Order of Witnesses, and Order of Cross-Examination ("List of Issues") filed on February 20, the MIEC takes the following position:

The Commission should require Ameren to present rigorous economic assessments of alternative near-term retirement dates for each of the Rush Island, Labadie, and Sioux units in its next general rate case. These forward-looking assessments should incorporate up-to-date assumptions regarding market prices, resource costs, and environmental compliance costs.

2. The MIEC takes no position on the other issues listed in the List of Issues.

WHEREFORE, the MIEC submits its Statement of Position.

Respectfully submitted,

BRYAN CAVE LEIGHTON PAISNER, LLP

By:\_\_/s/ Lewis Mills\_

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## ATTORNEYS FOR THE MISSOURI INDUSTRIAL ENERGY CONSUMERS

## **CERTIFICATE OF SERVICE**

I do hereby certify that a true and correct copy of the foregoing document has been emailed this 24th day of February, 2020, to all parties on the Commission's service list in this case.

\_\_\_/s/ Lewis Mills\_\_\_\_\_