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)	File No. ER-2019-0335
Decrease Its Revenues for Electric Service)	
)	

SIERRA CLUB'S STATEMENT OF POSITION

Sierra Club submits this Statement of Position:

I. Unit Commitment. Should any disallowance be ordered because of Ameren Missouri's unit commitment practices?

Yes. Ameren's coal unit commitment practices have led it to incur unnecessary net operational losses on behalf of ratepayers. The Company's claims that its 2018 unit commitment decisions were informed by rigorous analyses are undermined by the fact that Ameren has deleted all evidence of any such analyses. Ameren's own after-the-fact analyses indicate that the Company incurred unnecessary net operational losses on at least three occasions in 2018.

II. Coal Plants and Long-Term Planning. Should the Commission refuse to allow recovery of capital costs incurred at the Rush Island, Labadie, and Sioux Energy Centers during the test year or true-up period established for this case?

Yes. The Company has neglected to evaluate the reasonableness of continuing to invest in its coal plants in light of major environmental compliance costs facing the Rush Island, Labadie, and Sioux coal-burning plants. These units collectively incurred \$347 million in net losses relative to marginal market replacement over the period from 2016 through 2018, indicating the marginal economic value of these units. Ameren's 2017 Integrated Resource Plan ("IRP") coal unit analyses cannot be relied upon to support continued investment in Ameren's

coal units because Ameren failed to account for known compliance liabilities, the Company selected the wrong potential retirement date for its unit retirement studies, among other unreasonable assumptions. Ameren's standard IRP process is inadequate for addressing the economic risks facing the Company's existing coal units and more a rigorous economic assessment that is subject to thorough stakeholder and Commission review is required.

* * *

/s/ Henry B. Robertson

Henry B. Robertson Great Rivers Environmental Law Center 319 N. 4th St., Suite 800 St Louis, MO 63102 314-231-4181 hrobertson@greatriverslaw.org

Tony Mendoza Senior Attorney, Sierra Club 2101 Webster Street, Suite 1300 Oakland, CA 94612 415-977-5589 Fax: 510-208-3140 tony.mendoza@sierraclub.org

Josh Smith Senior Attorney, Sierra Club 2101 Webster Street, Suite 1300 Oakland, CA 94612 415-977-5560 joshua.smith@sierraclub.org

Counsel for Sierra Club

Dated: February 24, 2020

CERTIFICATE OF SERVICE

I hereby certify that the above and foregoing document was filed in EFIS on this 24th day of February, 2020, with notice of the same being sent to all counsel of record.

/s/ Tony Mendoza	
Tony Mendoza	