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)	Case No. EA-2022-0245
Approval of a Subscription-Based Renewable)	
Energy Program)	

RENEW MISSOURI'S STATEMENT OF POSITIONS

COMES NOW Renew Missouri Advocates ("Renew Missouri") and offers the follow statement of opinions:

Issue 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?

Sub-issue 1: Should the Commission find that the Project satisfies the first Tartan Factor of need?

Renew Missouri Position: Yes, the Commission should find that the Project satisfies the *Tartan* factor of need by serving the needs of the ten large commercial subscribers and passing on the benefit of a reduced cost of a needed renewable acquisition for all ratepayers. In addition, the Commission should rely on precedent that has defined need for renewable energy generation projects, as well as other forms of CCN requests, as an additional improvement justifying its cost rather than being "essential" or "absolutely indispensable." 1

Sub-issue 2: Should the Commission find that the Project satisfies the second Tartan Factor of economic feasibility?

Renew Missouri Position: Renew Missouri did not file testimony on this issue but reserves the right to base a final position on the evidence presented at hearing.

Sub-issue 3: Should the Commission find that the Project satisfies the third Tartan Factor of ability to finance?

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¹ State ex rel. Intercon Gas Co. v. P.S.C., 848 S.W.2d 593, 597 (Mo. App. W.D. 1993).

Renew Missouri Position: Renew Missouri did not file testimony on this issue but reserves the right to base a final position on the evidence presented at hearing.

Sub-issue 4: Should the Commission find that the Project satisfies the fourth Tartan Factor of qualified to construct?

Renew Missouri Position: Renew Missouri did not file testimony on this issue but reserves the right to base a final position on the evidence presented at hearing.

Sub-issue 5: Should the Commission find that the Project is in the public interest and satisfies the fifth Tartan Factor?

Renew Missouri Position: Yes, the Commission should find that the Project serves the public interest due to factors involving economic development, incentivizing individuals and businesses to move to Missouri that are seeking access to renewable energy, and the improvement of the environment through a reduction of the amount of carbon dioxide emitted into the atmosphere.

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

Renew Missouri Position: The Commission should impose conditions consistent with other recently granted solar CCNs before the PSC.

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

Sub-issue 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?

Renew Missouri Position: Yes, the Commission should approve the Renewable Solutions

Program proposed by Ameren Missouri in the present proceeding.

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

Renew Missouri Position: Renew Missouri did not file testimony on this issue but reserves the right to base a final position on the evidence presented at hearing.

WHEREFORE, Renew Missouri submits its Statement of Positions.

Respectfully Submitted,

/s/ Alissa Greenwald

Alissa Greenwald, Mo. Bar No. 73727 P.O. Box 413071 Kansas City, MO 64141 T: (913) 302-5567 alissa@renewmo.org

/s/ Andrew Linhares

Andrew Linhares, Mo. Bar No. 63973 3115 S. Grand Blvd, Suite 600 St. Louis, MO 63118 T: (314) 471-9973 andrew@renewmo.org

Attorneys for Renew Missouri

Certificate of Service

I hereby certify that copies of the foregoing have been emailed to all counsel of record this 27th day of January 2023:

/s/ Alissa Greenwald