

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)	

NRDC’S STATEMENT OF POSITION

Comes now Natural Resources Defense Council (NRDC) 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 Stipulation and Agreement.

Respectfully submitted,

/s/ Henry B. Robertson
Henry B. Robertson (Mo. Bar No. 29502)
Great Rivers Environmental Law Center
319 N. Fourth Street, Suite 800
St. Louis, Missouri 63102
(314) 231-4181
(314) 231-4184 (facsimile)
hrobertson@greatriverslaw.org
Attorney for NRDC

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