BEFORE THE PUBLIC SERVICE COMMISSION OF THE STATE OF MISSOURI

In the Matter of Ameren Missouri's Request)	
For a Variance Regarding Its Renewable)	File No. EE-2023-0127
Energy Standard Compliance)	

STAFF RECOMMENDATION

COMES NOW Staff of the Missouri Public Service Commission and submits its Staff Recommendation in this matter, and in support hereof states as follows:

- 1. On October 10, 2022, Union Electric Company, d/b/a Ameren Missouri ("Ameren Missouri" or the "Company"), filed its request under 20 CSR 4240-20.100(11) for a variance from a portion of the Commission's Renewable Energy Standard ("RES") rules; specifically, a portion codified at 20 CSR 4240-20.100(3)(J), and for a waiver of the 60-day notice requirement in 20 CSR 4240-4.017(1).
- 2. On October 11, 2022, the Commission issued an *Order Directing Filing* ("Order"), which ordered Staff to file a Recommendation in this matter no later than November 10, 2022.
- 3. For the reasons set forth in greater detail in the Staff Recommendation memorandum filed herewith and incorporated herein by reference, Staff recommends the Commission grant Ameren Missouri's requested variance from 20 CSR 4240-20.100(3)(J) for the 2022 compliance year, and a waiver of the 60-day notice requirement in 20 CSR 4240-4.017(1).

WHEREFORE, Staff submits its Staff Recommendation as ordered and recommends the Commission grant Ameren Missouri's requested variance from 20 CSR 4240-20.100(3)(J) for the 2022 compliance year, and a waiver of the 60-day notice requirement in 20 CSR 4240-4.017(1).

Respectfully submitted,

/s/ Jeffrey A. Keevil

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CERTIFICATE OF SERVICE

I hereby certify that copies of the foregoing have been mailed, hand-delivered, or transmitted by facsimile or electronic mail to counsel of record as reflected on the certified service list maintained by the Commission in its Electronic Filing Information System this 10th day of November, 2022.

/s/ Jeffrey A. Keevil