

**BEFORE THE PUBLIC SERVICE COMMISSION
OF THE STATE OF MISSOURI**

In the Matter of Union Electric Company d/b/a)
Ameren Missouri's Request for a Variance) **File No. EE-2023-0409**
Regarding its Renewable Energy Standard)
Compliance)

STAFF RECOMMENDATION

COMES NOW the Staff of the Missouri Public Service Commission (“Staff”),
by and through counsel, and for its *Staff Recommendation*, states as follows:

1. On June 1, 2023, Union Electric Company d/b/a Ameren Missouri (“Ameren Missouri”) filed its request for a variance from renewable energy standard compliance rules and the Commission’s 60-day notice requirement.

2. Ameren Missouri requested a variance of 20 CSR 4240-20.100(8)(A)1.I. and 20 CSR 4240-20.100(8)(A)1.J.

3. Staff recommends that the Commission grant the variance for 20 CSR 4240-20.100(8)(A)1.I. for the third-party REC purchases. Ameren provided supplemental information on the purchases in an attempt to comply with the rule. Furthermore, the producing facilities have been certified by the Missouri Department of Natural Resources Division of Energy, and the RECs have been properly registered in the Commission’s approved tracking system, the North American Renewables Registry.

4. Staff recommends the Commission reject the variance for 20 CSR 4240-20.100(8)(A)1.J. for reporting on customer-owned systems. Ameren Missouri provided the required information under this rule for certified systems and does not need a variance. Should the Commission grant a variance to this rule, it could obstruct compliance with Ameren’s tariff, which requires this information of

customer generators in the interconnection application and for billing. Furthermore, this information is necessary for determining the amount of solar rebates to be paid and prorating the amount of RECs received from customer generation aggregations in the first and final years.

5. Staff is not opposed to the Commission granting Ameren Missouri the requested waiver from the requirements of Commission Rule 20 CSR 4240-4.017(1).

WHEREFORE, Staff respectfully requests the Commission to grant Ameren Missouri's request for variance for 20 CSR 4240-20.100(8)(A)1.J and 20 CSR 4240-20.100(8)(A)2. In addition, Staff respectfully requests the Commission deny Ameren Missouri's request for variance for 20 CSR 4240-20.100(8)(A)1.J.

Respectfully submitted,

/s/ Eric Vandergriff

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CERTIFICATE OF SERVICE

I hereby certify that copies of the foregoing have been mailed or hand-delivered, transmitted by facsimile or electronically mailed to all parties and/or counsel of record on this 30th day of June, 2023.

/s/ Eric Vandergriff