

**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	)	<b><u>File No. EE-2020-0411</u></b>
Variance Regarding its Renewable	)	
Energy Standard Compliance	)	

**STAFF RECOMMENDATION**

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

1. On April 15, 2020, Union Electric d/b/a Ameren Missouri (Ameren Missouri) filed its 2019 Renewable Energy Standard (RES) Compliance Report and 2020 RES Compliance Plan as required by 20 CSR 4240-20.100(8) in Case No. EO-2020-0328.

2. Thereafter the Commission ordered Staff to review the Report and Plan and to file a report within 45 days, which was May 30, 2020.

3. Staff completed its review of Ameren Missouri's 2020 RES Compliance Plan and found no deficiencies. Staff filed its 2020 Report on May 29, 2020 in Case No. 2020-0328.

4. While reviewing Ameren Missouri's 2019 RES Compliance Report, Staff discovered there were deficiencies in the information provided. Staff requested an extension of 13 days, until June 12, 2020, to file its Staff Report on Ameren Missouri's 2019 RES Compliance Report. The Commission granted this request, and Ameren Missouri provided additional information in response to Staff's inquiries.

5. On June 12, 2020, in Case No. EO-2020-0328, Staff filed its 2019 Report, and, as stated on page 1 of the *Memorandum*, verified Ameren Missouri has retired

enough RECs to satisfy the 2019 RES requirements. Staff also recommended Ameren Missouri apply for a waiver of Commission Rule 20 CSR 4240-20.100(8) (A) 1.I.

6. On June 23, 2020, Ameren Missouri filed its *Request for Variance*, opening the current case. Ameren Missouri stated in its Request for Variance that it initially operated under the belief that variances granted in Case No. EO-2012-0150 covered the information it did not possess in its most recent RES report. Staff views a variance as effective only for the specific reporting period in which it is requested, unless otherwise specified in the Commission's order.

7. Staff recommends the Commission grant the variance for specified reporting period, for good cause shown.

**WHEREFORE,** Staff prays the Commission accepts its *Staff Recommendation*, and approves the variance request.

Respectfully submitted,

**/s/ Nicole Mers**

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### **CERTIFICATE OF SERVICE**

I hereby certify that true and correct copies of the foregoing were served electronically to all counsel of record this 22<sup>nd</sup> day of July, 2020.

**/s/ Nicole Mers**