

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

In the Matter of Union Electric Company)
d/b/a Ameren Missouri’s Filing of its)
Renewable Energy Standard Compliance)
Plan and Renewable Energy Compliance)
Report pursuant to 20 CSR 4240-20.100)

File No. EO-2021-0352

STAFF REPORT

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

1. On April 15, 2021, Union Electric d/b/a Ameren Missouri filed its 2020 Renewable Energy Standard (“RES”) Compliance Report and 2021 RES Compliance Plan as required by 20 CSR 4240-20.100(8).

2. Thereafter the Commission ordered Staff to review the Report and Plan and to file a report within 45 days.

3. Staff has completed its review of Ameren Missouri’s RES Compliance Report and Plan, as detailed in the attached Staff Memorandums and incorporated herein, and notes several deficiencies with Ameren Missouri’s reporting related to third party renewable energy credit (“REC”) purchases as required by 20 CSR 4240-20.100(8)9A)1.I. These deficiencies are similar to the deficiencies Staff noted in Ameren Missouri’s previous RES Compliance Report and Plan filing, Case No. EO-2020-0328, where Staff had recommended Ameren Missouri apply for a variance from Commission Rule 20 CSR 4240-20.100(8)(A)1.I..

4. In this instant Ameren Missouri RES filing, Staff also recommends Ameren Missouri apply for a variance from Commission Rule 20 CSR 4240-20.100(8)(A)1.I..

The variance the Commission granted Ameren Missouri in Case No. EE-2020-0411 is not applicable to this instant filing. Ameren Missouri needs to apply for a new variance from Commission Rule 20 CSR 4240-20.100(8)(A)1.I. to remedy the deficiencies Staff notes in its attached Memorandum.

WHEREFORE, Staff renders this *Staff Report* for the Commission's information and consideration.

Respectfully submitted,

/s/ Jamie S. Myers

Jamie S. Myers

Associate Counsel

Missouri Bar No, 68291

Attorney for the Staff of the

Missouri Public Service Commission

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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 1st day of June, 2021.

/s/ Jamie S. Myers

MEMORANDUM

TO: Missouri Public Service Commission
Official Case File, Case No. EO-2021-0352
Ameren Missouri's 2020 Renewable Energy Standard Compliance Report

FROM: Cedric E. Cunigan, Engineering Analysis

/s/ Claire M. Eubanks, PE / 06-01-2021 /s/ Jamie Myers / 06-01-2021
Engineering Analysis / Date Staff Counsel's Office / Date

SUBJECT: Staff Report and Conclusion on Ameren Missouri's 2020 Renewable Energy Standard Compliance Report

DATE: June 1, 2021

SUMMARY

Staff has reviewed the Union Electric Company, d/b/a Ameren Missouri ("Company" or "Ameren Missouri") 2020 Renewable Energy Standard ("RES") Compliance Report. Staff utilized the North American Renewables Registry ("NAR") to independently verify the retirement of the renewable energy credits ("RECs") by the Company. Ameren Missouri has retired sufficient RECs to satisfy the 2020 RES requirements. However, Staff notes several deficiencies with Ameren Missouri's reporting related to third party REC purchases per 20 CSR 4240-20.100(8)(A)1.I., similar to the 2019 report in Case No. EO-2020-0328. The purpose of subsection 20 CSR 4240-20.100(8)(A)1.I. is to properly identify the RECs being used for compliance. Ameren Missouri stated in its 2019 Report that it does not have access to all the information required by 20 CSR 4240-20.100(8)(A)1.I., because the RECs were purchased through a third party. Ameren Missouri also stated that the RECs were registered in a reliable manner and approved by NAR and the Missouri Department of Natural Resources, Division of Energy ("MDNR-DE"). Ultimately, Ameren Missouri was granted a variance from this rule in Case No. EE-2020-0411 that applied only to the 2019 report. Staff suggests that Ameren Missouri apply for a similar variance in this case.

OVERVIEW

On April 15, 2021, Ameren Missouri filed its RES Compliance Report (Compliance Report) for calendar year 2020 (Case No. EO-2021-0352), in accordance with 20 CSR 4240-20.100(8), Electric Utility Renewable Energy Standard Requirements, Annual RES Compliance Report and RES Compliance Plan. This rule states, in part, “Each electric utility shall file an RES compliance report no later than April 15 to report on the status of both its compliance with the RES and its compliance plan as described in this section for the most recently completed calendar year.” Subparagraphs 20 CSR 4240-20.100(8)(A)1. A. through P. provide the minimum requirements for the Compliance Report. Subsection 4 CSR 240-20.100(8)(D) requires that Staff examine the Company’s Compliance Report and file a report within forty-five (45) days of the filing.

Staff utilized NAR to independently verify the retirement of the RECs and solar renewable energy credits (“S-RECs”) by the Company.

DISCUSSION

Staff reviewed the Company’s Compliance Report in accordance with the established requirements to verify the Compliance Report contains the information required. The results of this review are detailed below, with appropriate rule subparagraphs A. through P. identified and quoted.

A. “Total retail electric sales for the utility, as defined by this rule:”

The Company provided the total retail electric sales for 2020 expressed as total megawatt-hours (“MWh”) sold to Ameren Missouri consumers consistent with the amount of 30,601,887 MWh listed within the 2020 FERC Form 1 submitted in EFIS on April 15, 2020.¹

¹ Page 301 of 2020 FERC Form 1, Line 10.

B. “Total jurisdictional revenue from the total retail electric sales to Missouri customers as measured at the customers’ meters;”

The Company provided the total sales to ultimate customers for 2020 expressed as annual operating revenues (dollars) from Ameren Missouri consumers as \$2,972,989,112 in the RES report. This number appears to be total company revenues reported on page 2 of the Electric / Steam-Heat Annual Report Supplemental Pages to the Missouri Public Service Commission. Total sales to ultimate consumers as listed in on page 300, column 10 of the FERC Form 1 is \$2,540,139,209.

C. “Total retail electric sales supplied by renewable energy resources, as defined by section 393.1025(5), RSMo, including the source of the energy;”

The Company utilized five (5) company-owned renewable energy generating facilities during 2020: the Keokuk Hydroelectric Generating Station (“Keokuk”), the Maryland Heights Renewable Energy Center (“MHREC”); the O’Fallon Renewable Energy Center (“OREC”), the BJC Solar facility, and the Ameren Missouri headquarters office building. The Company also acquired energy through a power purchase agreement (“PPA”) with Pioneer Prairie II Wind Farm (“Pioneer Prairie”). The total amount of energy generated in 2020 for the above listed renewable energy facilities was ** [REDACTED] **.

D. “The number of RECs and S-RECs created by electrical energy produced by renewable energy resources owned by the electric utility. For the electrical energy produced by these utility-owned renewable energy resources, the value of the energy created. For the RECs and S-RECs, a calculated REC or S-REC value for each source and each category of REC;”

The Company reported the following information on pages 7 and 8 of its Compliance Report:

Facility	Number of RECs	Compliance Equivalency for In-State²	Value of RECs (\$/REC)
Keokuk	1,009,513	n/a	Not assigned
Ameren Headquarters	69	86	Not assigned
MHREC	62,669	78,336	\$1,321,062
OREC	5,913	7,391	\$124,646
BJC Solar	2,107	2,634	\$44,416

The Company stated it did not assign a value to RECs created by Keokuk due to restrictive nature of utilizing hydroelectric to meet renewable portfolio standards in other states and the fact that Keokuk's costs are already part of the existing rate structure. Ameren Missouri treats the RECs as a government incentive. Staff believes there is a value to the RECs and S-RECs created by the Company's owned generation though that value is not transparent.

E. "The number of RECs acquired, sold, transferred, or retired by the utility during the calendar year;"

The Company provided the following information regarding the number of RECs acquired in 2020:

² Renewable resources located in Missouri qualify for the one and twenty-five hundredths (1.25) credit multiplier allowed by statute and regulation; section 393.1030.1., RSMo; 20 CSR 4240-20.100(3)(G).

Source	Pioneer Prairie II	Customer Solar ³	3 rd Party Solar Purchase	3 rd Party Non-Solar Purchase
RECs/ S-RECs	** [REDACTED] **	57,375 (71,719)	9,018	564,668

The Company provided the following information regarding the number of RECs retired for 2020 non-solar compliance (values below include 1.25 credit for in-state generation):

Resource	2018 vintage	2019 vintage	2020 vintage	Total
Keokuk		632,667	856,018	1,488,685
MHREC		9,039	47,805	56,844
Pioneer Prairie II		103,574	238,844	342,418
3 rd party Non-Solar Purchased RECs	3,017	599,469	461,339	1,063,825
Customer Solar		47,214		47,214
Total				2,998,996

The Company provided the following information regarding the number of RECs retired for 2020 solar compliance:

Resource	2017 vintage	2018 vintage	2019 vintage	Total
OREC			5,445	5,445
Customer Solar		24,365		24,365
3 rd party Solar RECs	4,841	17,535	9,018	31,394
Total				61,204

Staff verified through NAR that the Company retired a total of 2,952,011 RECs (3,060,189 MO equivalency), with at least 2% from solar sources. The company was required to retire 3,060,189 total RECs with at least 61,204 being S-RECs. These RECs

³ The 57,263 figure comes from NAR. The (71,578.75) figure represents the final value for compliance after the 1.25 credit for in state generation is applied.

were registered and retired in the electronic tracking system⁴ utilized for compliance purposes. In accordance with statute and regulation, a certified renewable energy resource produced these RECs and they were banked and utilized appropriately.⁵

Ameren Missouri stated that there were no RECs sold during the calendar year.

F. “The source of all RECs acquired during the calendar year;”

The Company acquired RECs from Pioneer Prairie, third party REC purchases, and its customer-generators during 2020. See Sections D, E, and I of the report for the amounts. See Section I for more discussion of the third party REC purchases.

G. “The identification, by source and serial number, or some other identifier sufficient to establish the vintage and source of the REC, of any RECs that have been carried forward to a future calendar year;”

The Company provided a listing of RECs carried forward for future year(s) as Exhibit 1 of the Compliance Report. Exhibit 1 includes the serial numbers for RECs generated by Keokuk, MHREC, OREC, and aggregated customer S-RECs.⁶

H. “An explanation of how any gains or losses from sale or purchase of RECs for the calendar year have been accounted for in any rate adjustment mechanism that was in effect for the utility;”

Ameren Missouri states that there were no sales of RECs and all purchased RECs were used to meet 2020 compliance requirements or banked for future compliance requirements.

⁴ North American Renewables Registry: <http://narecs.com/>.

⁵ Renewable Energy Resource per Section 393.1025.(5), RSMo and 20 CSR 4240-20.100(1)(N); Banked RECs per Section 393.1030.2., RSMo and 20 CSR 4240-20.100(1)(M).

⁶ Aggregated S-RECs include customer generated S-RECs and Ameren Headquarters.

I. “For acquisition of electrical energy and/or RECs from a renewable energy resource that is not owned by the electric utility, the following information for each resource that has a rated capacity of ten (10) kW or greater:”

“(I) Facility name, location (city, state), and owner;”

The Company provided the necessary information for Pioneer Prairie. The information was not provided for the third party REC purchases, however Staff was able to identify the facilities through NAR and MDNR-DE. Staff proposes that Ameren Missouri apply for a variance from this requirement for its third party purchased RECs.

“(II) That the energy was derived from an eligible renewable energy technology and that the renewable attributes of the energy have not been used to meet the requirements of any other local or state mandate;”

The Company provided an affidavit for Pioneer Prairie as Exhibit 2 of the Compliance Report, which indicates it was derived from an eligible technology and that the renewable attributes have not been used for other purposes.

No affidavit was provided for the third party REC purchases. Staff confirmed through NAR that the RECs purchased from third parties were on the list of MDNR-DE’s list of certified renewable energy generation facilities. Staff proposes that Ameren Missouri apply for a waiver of this requirement for its third party purchased RECs.

“(III) The renewable energy technology utilized at the facility;”

The affidavit for Pioneer Prairie includes the technology type used. Ameren Missouri provided the type of generation as solar, non-solar, or MO wind for third party purchases. Staff was able to identify through NAR the technology for individual purchase. Staff proposes that Ameren Missouri apply for a variance from this requirement for its third party purchased RECs.

“(IV) The dates and amounts of all payments from the electric utility to the owner of the facility;”

The dates and amounts for the payments to Pioneer Prairie were provided in Exhibit 3 of the Compliance Report. Trade dates were reported for third party REC purchases.

“(V) All meter readings used for the calculation of the payments referenced in part (IV) of this paragraph;”

The meter readings and payments were provided for Pioneer Prairie in Exhibit 3 of the Compliance Report.

Staff proposes that Ameren Missouri apply for a variance from this requirement for its third party purchased RECs.

The purpose of this subparagraph is to demonstrate the validity of RECs and/or S-RECs obtained from sources that are not owned by the electric utility. Generation of renewable energy at company-owned resources is typically monitored by revenue quality meters and/or reported through an independent system operator. Resources in which this subparagraph applies to are not necessarily monitored by the utility that seeks to retire the associated RECs for compliance purposes. This subparagraph compensates for the lack of utility ownership/control of the renewable energy resource. In the past, Staff has recommended a variance based on the availability of a reasonable substitute to the meter readings, such as invoices. In this instance, invoices would not have been paid by Ameren Missouri.

J. “For acquisition of electrical energy and/or RECs from a customer-generator:

(I) Location (zip code);

(II) Name of aggregated subaccount in which RECs are being tracked in;

(III) Interconnection date

(IV) Annual estimated or measured generation; and

(V) The start and end date of any estimated or measured RECs being acquired;”

Ameren Missouri provided the required information in its 2020 RES Compliance Report, Exhibit 6. Ameren Missouri did note that some projects associated with 2019 and 2018 solar rebate payments have just been certified by MDNR-DE, and that those projects were not included in this report.

K. “The total number of customers that applied and received a solar rebate in accordance with section (4) of this rule;”

The Company paid seven hundred eighty-five (785) solar rebates during calendar year 2020.

L. “The total number of customers that were denied a solar rebate and the reason(s) for denial;”

The Company stated that no customers were denied a solar rebate.

M. “The amount expended by the electric utility for solar rebates, including the price and terms of future S-REC contracts associated with the facilities that qualified for the solar rebates;”

The Company paid \$2,261,026.25 in solar rebates for calendar year 2020.

The Company included the Solar Rebate RSMO 393.1030 Tariff in Exhibit 4 of the Compliance Report and the Solar Renewable Energy Credit Purchase Tariff in Exhibit 5.

- N. “An affidavit documenting the electric utility’s compliance with the RES compliance plan as described in this section during the calendar year;”**

The Company filed the affidavit in Exhibit 7 of the Compliance Report.

- O. “If compliance was not achieved, an explanation why the electric utility failed to meet the RES.”**

Ameren Missouri has retired enough RECs to achieve compliance with the 2020 RES requirements.

- P. “A calculation of its actual calendar year retail rate impact.”**

The Company provided a calculation of its actual calendar year retail rate impact⁷ in its 2020 RES Compliance Report. The 2020 actual calendar year retail rate impact was reported as 0.61%.

⁷ Total RES Compliance Cost divided by the Adjusted Revenue Requirement. Adjusted Revenue Requirement is the Revenue Requirement less the fixed costs associated with of existing renewable resources.

BEFORE THE PUBLIC SERVICE COMMISSION
OF THE STATE OF MISSOURI

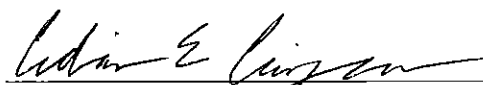
In the Matter of Union Electric Company)
d/b/a Ameren Missouri's Filing of its)
Renewable Energy Standard Compliance)
Plan and Renewable Energy Compliance)
Report pursuant to 20 CSR 4240-20.100) Case No. EO-2021-0352

AFFIDAVIT OF CEDRIC E. CUNIGAN

STATE OF MISSOURI)
)
COUNTY OF COLE) ss.

COMES NOW CEDRIC E. CUNIGAN and on his oath declares that he is of sound mind and lawful age; that he contributed to the foregoing *Staff Report on Ameren Missouri's 2020 Renewable Energy Standard Compliance Report*; and that the same is true and correct according to his best knowledge and belief.

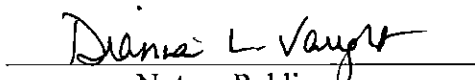
Further the Affiant sayeth not.



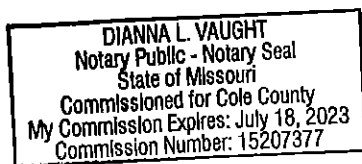
CEDRIC E. CUNIGAN

JURAT

Subscribed and sworn before me, a duly constituted and authorized Notary Public, in and for the County of Cole, State of Missouri, at my office in Jefferson City, on this 1st day of June 2021.



Notary Public



MEMORANDUM

TO: Missouri Public Service Commission
Official Case File, Case No. EO-2021-0352
Renewable Energy Standard Compliance Plan 2021 – 2023 for
Union Electric Company, d/b/a Ameren Missouri

FROM: Cedric E. Cunigan, Engineering Analysis

/s/ Claire M. Eubanks, PE / 06-01-2021
Engineering Analysis / Date

/s/ Jamie Myers / 06-01-2021
Staff Counsel's Office / Date

SUBJECT: Staff Report on Ameren Missouri's Renewable Energy Standard (RES)
Compliance Plan 2021-2023

DATE: June 1, 2021

SUMMARY

The Staff has reviewed Union Electric Company, d/b/a Ameren Missouri's ("Ameren Missouri" or "Company") *Renewable Energy Standard Compliance Plan 2021-2023* ("*Plan*"). Based on Staff's review, the Company has met the minimum requirements for the *Plan*.

OVERVIEW

On April 15, 2021, the Company filed its *Plan* for calendar years 2021 through 2023, in accordance with Rule 20 CSR 4240-20.100(8), Electric Utility Renewable Energy Standard Requirements, Annual RES Compliance Report and RES Compliance Plan. This rule states, in part, "Each electric utility shall file an annual RES compliance plan with the commission. The plan shall be filed no later than April 15 of each year." Subparagraphs 20 CSR 4240-20.100(8)(B)1. A. through G. provide the minimum requirements for the plan. Subsection 20 CSR 4240-20.100(8)(D) requires that Staff examine the plan and file a report within forty-five (45) days of the filing.

DISCUSSION

Staff reviewed the Company's *Plan* in accordance with the established requirements to verify the *Plan* contains the information required by the rule. The results of this review are detailed below, with appropriate rule subparagraphs A. through G. identified and quoted.

A. “A specific description of the electric utility’s planned action to comply with the RES;”

Ameren Missouri generally described its planned actions to comply with the RES for the 2021-2023 timeframe. Ameren Missouri had two facilities become operational, the 400 MW High Prairie Renewable Energy Center (HPREC) and 128.4 MW of the 298.4 MW Atchison County Renewable Energy Center (ACREC). Additionally, the Company expects to make renewable energy certificates (“RECs”) purchases in the 2021-2023 timeframe. The Company considered the cost of REC purchases in its retail rate impact (“RRI”) calculation.

The Company explains in the *Plan* that it will continue to utilize RECs from the Keokuk Hydroelectric Generating Station (“Keokuk”), the Maryland Heights Renewable Energy Center (“MHREC”) which utilizes landfill gas, and a purchased power agreement (“PPA”) from the Pioneer Prairie II Wind Farm (“Pioneer Prairie”), HPREC, and ACREC. MHREC, ACREC, HPREC, qualify for the Missouri in-state one and twenty-five hundredths (1.25) credit.

For solar compliance, the Company will utilize solar renewable energy credits (“S-RECs”) from net-metered customers, the solar generation facility installed at the Company headquarters, The BJC Solar facility, and its utility-scale solar facility O’Fallon Renewable Energy Center (“OREC”). The net-metered systems and Company-owned solar generation will qualify for the Missouri in-state one and twenty-five hundredths (1.25) credit.¹ The Company also has plans for at least \$14 million of utility owned solar to comply with SB 564 as well 50 MW of utility scale solar facilities.

¹ Section 393.1030.1., RSMo; Rule 4 CSR 240-20.100(3)(G).

B. “A list of executed contracts to purchase REC’s (whether or not bundled with energy), including type of renewable energy resource, expected amount of energy to be delivered, and contract duration and terms;”

Table 3 on page 11 of the *Plan* includes a list of executed contracts, the type of renewable energy, the expected energy to be delivered and contract duration and terms.

The Company provided the following information regarding its executed contracts:

Contracting Party	Resource Type	Contract Type	Contract Duration	Time Period	Expected REC's	Terms
Horizon Pioneer Prairie	Wind	Energy/REC's	09/01/09-08/31/24	2021	286,763	Deliveries of energy and REC's began 9/1/09. Term is 15 years with option an option to extend based on mutually acceptable terms & conditions
				2022	286,763	
				2023	286,763	
Various Residential & Commercial Customers	Solar	S-REC only	10 year	2021	139,634	
				2022	179,032	
				2023	214,701	

Note: All S-RECs procured from customers are entitled to the additional factor of 1.25 and the figures in this table reflect the total including the 1.25 factor.

** [REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]² ** A full list of customer generators was provided in Exhibit 6 of the 2020 Compliance Report.

C. “The projected total retail electric sales for each year;”

The Company provided values for its projected retail electric sales. The values appear to be reasonable estimates.

² HB 142 passed on July 3, 2013, and required that any customer receiving a solar rebate would transfer to the electric utility all right, title, and interest in and to RECs associated with new or expanded solar systems that qualified the customer for the rebate for a period of 10 years from the date the system is confirmed to be installed and operational by the utility. This change is codified in 4 CSR 240-20.065(3), which set the start of this change for all systems operational after August 28, 2013.

- D. “Any differences, as a result of RES compliance, from the utility’s preferred resource plan as described in the most recent electric utility resource plan filed with the commission in accordance with 20 CSR 4240-22, Electric Utility Resource Planning;”**

The Company submitted its most recent Integrated Resource Plan (IRP) on October 1, 2020. The *Plan* has been updated to include new wind additions, solar additions in response to Senate Bill 564, and 50 MW of additional utility scale solar. The *Plan* is consistent with the IRP.

- E. “A detailed analysis providing information necessary to verify that the RES compliance plan is the least cost, prudent methodology to achieve compliance with the RES;”**

The Company discussed items of cost related to RES compliance for the planning period on pages 13 and 14 of its *Plan*. The *Plan* includes costs related to new wind resources and also new solar resources required by Senate Bill 564.³ Staff wants it to be clear that when it states it has not identified any deficiencies in Ameren Missouri’s *Plan*, Staff has not made a ratemaking determination whether the *Plan* is the least cost, prudent method in complying with the RES, and suggests the Commission be clear in any Order it may issue in this case that it is not making any ratemaking determination.

- F. “A calculation of the RES retail rate impact limit calculated in accordance with section (5) of this rule. The calculation should be accompanied by workpapers including all the relevant inputs used to calculate the retail rate impact limits for the planning interval which is included in the RES compliance plan. The electric utility may designate all or part of those calculations as**

³ Section 393.1665 RSMo.

highly confidential, proprietary, or public as appropriate under the commission’s rules;”

The Company provided a description of the RRI calculation on pages 14-15 of the *Plan* and provided the associated workpaper. The workpaper models unconstrained renewable additions to meet the requirements and constrained renewable additions to remain under the 1% RRI limitation. ** [REDACTED] **

G. “Verification that the utility has met the requirements for not causing undue adverse air, water, or land use impacts pursuant to subsection 393.1030.4. RSMo, and the regulations of the division.”

The Company states that the generating facilities utilized to meet the RES requirements have been certified by the Missouri Department of Economic Development, now the Missouri Department of Natural Resources, Division of Energy.⁴ Staff confirmed the existing renewable resources Ameren Missouri intends to utilize over the planning period have been certified by the Missouri Department of Natural Resources, Division of Energy.

⁴ Rule 10 CSR 140-8.010(4).

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In the Matter of Union Electric Company)
d/b/a Ameren Missouri's Filing of its)
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Report pursuant to 20 CSR 4240-20.100) Case No. EO-2021-0352

AFFIDAVIT OF CEDRIC E. CUNIGAN

STATE OF MISSOURI)
) ss.
COUNTY OF COLE)

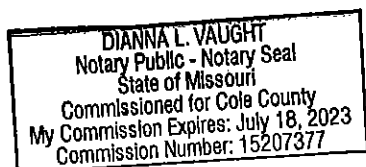
COMES NOW CEDRIC E. CUNIGAN and on his oath declares that he is of sound mind and lawful age; that he contributed to the foregoing *Staff Report on Ameren Missouri's Renewable Energy Standard Compliance Plan 2021-2023*; and that the same is true and correct according to his best knowledge and belief.

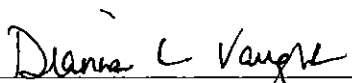
Further the Affiant sayeth not.


CEDRIC E. CUNIGAN

JURAT

Subscribed and sworn before me, a duly constituted and authorized Notary Public, in and for the County of Cole, State of Missouri, at my office in Jefferson City, on this 1st day of June 2021.




Notary Public