

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

In the Matter of a Determination of Special)
Contemporary Resource Planning Issues to be)
Addressed by Ameren Missouri in Its Next) **File No. EO-2023-0099**
Triennial Compliance Filing or Next Annual)
Update Report.)

**STAFF SUGGESTIONS FOR SPECIAL CONTEMPORARY
RESOURCE PLANNING ISSUES**

COMES NOW, the Staff of the Missouri Public Service Commission (“Staff”), by and through the undersigned counsel, and for its response to the Commission’s September 13, 2022, Order Opening a File Regarding Special Contemporary Resource Planning Issues And Offering An Opportunity to File Suggestions, respectfully states:

1. Union electric Company d/b/a Ameren Missouri is to host an annual update workshop on or about October 1, 2022.¹ Ameren Missouri’s next triennial compliance filing is scheduled for October 1, 2023.²
2. The Commission is to issue an order containing a list of special contemporary issues for Ameren Missouri to analyze and document in its triennial compliance filing or next annual update report.³
3. The purpose of the special contemporary issues lists is to ensure that evolving regulatory, economic, financial, environmental, energy, technical, and/or

¹ 20 CSR 4240-22.080(3) states, “...on or about April 1 of every year in which the utility is not required to submit a triennial compliance filing, each electric utility shall host an annual update workshop...” 20 CSR 4240-22.080(3)(B) states, “The utility shall prepare an annual update report...and shall file the annual update reports with the commission no less than twenty (20) days prior to the annual update workshop...” However, because the Commission, at Ameren Missouri’s request, moved Ameren Missouri’s triennial filing date to October rather than April, the annual update was also moved to October. EE-2022-0243.

² 20 CSR 4240-22.080(1)(C) requires Ameren Missouri to submit its triennial compliance filing on April 1 every third year, beginning in 2014. However, the Commission, at Ameren Missouri’s request, moved Ameren Missouri’s triennial filing date to October rather than April. EE-2022-0243.

³ 20 CSR 4240-22.080(4).

customer issues are adequately addressed by each utility in its electric resource planning.⁴

4. Pursuant to Commission Rule 20 CSR 4240-22.080(4)(A), Staff suggests Ameren Missouri include and address the following special contemporary issues in its next annual update report:

- A. The Company shall provide details of its plans to utilize securitization. Details shall include but are not limited to: 1) type of items to be securitized; 2) explanation for need of securitization for each item; 3) how it plans to utilize securitization for each item; 4) estimated costs of securitized items; 5) comparison of ratepayer costs and benefits.
- B. The Company shall provide detailed analysis comparing ratepayer risks and shareholder risks for additional generation resources which are not required to meet federal, state, or RTO requirements. This is consistent with the Commission's Order Regarding 2020 Integrated Resource Plan in Case No. EO-2021-0021 for Ameren Missouri.
- C. Given the recent COVID pandemic and the Winter Storm Uri weather event, the Company shall provide details of its plan for handling future emergency events such as these. The details provided shall give a clear plan for maintaining supply-side resource generation and public welfare during emergency events.

⁴ *Id.*

WHEREFORE, Staff suggests Ameren Missouri address in its next annual update report the special contemporary issues set forth above. However, since Ameren Missouri's next annual update report is to be submitted in October 2022, Staff suggests the Commission allow until December 15, 2022, for Ameren Missouri to update its annual update report with Staff's listed special contemporary issues.

Respectfully submitted,

/s/ J. Scott Stacey

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CERTIFICATE OF SERVICE

I hereby certify that copies of the foregoing have been mailed, hand delivered, transmitted by facsimile or electronic mail to all parties and/or counsel of record on this 15th day of September, 2022.

/s/ J. Scott Stacey