

BEFORE THE PUBLIC SERVICE COMMISSION
OF THE STATE OF MISSOURI

In the Matter of a Determination of Special)	
Contemporary Resource Planning Issues to be)	File No. EO-2019-0065
Addressed by Ameren Missouri)	
in its Next Triennial Compliance Filing)	
or Next Annual Update Report)	

SUGGESTED SPECIAL CONTEMPORARY ISSUES OF NRDC

Pursuant to 4 CSR 240-22.080(4), the Natural Resources Defense Council recommends the following as special contemporary resource planning issues for consideration and analysis by Ameren Missouri.

1. Analyze the benefits of integrated distribution planning as a way to manage distribution grid investments in a manner that reduces peaks and fills valleys in load profiles and lowers overall system costs with a combination of energy efficiency, demand response, electric vehicles, distributed generation, storage, advanced metering, and pricing strategies such as time-of-use rates (TOU) for electric vehicles and inclining block rates (IBR).
2. Analyze and assess agriculture-based sequestration opportunities in Ameren's service territory to provide low-cost solutions to achieve Company's overall carbon goals. Farmers can transfer carbon from the air to the soil by such methods as planting cover crops and practicing no-till agriculture. Paying them incentives to do so would advance Ameren's carbon reduction goals and benefit its customers.
3. Analyze and document the prospects for using securitization to advance the retirement of coal generation assets and channel the savings into more economical investments such as

demand-side management, building wind and solar generation, and satisfying corporate renewable energy goals to attract new business to the service territory.

4. Assess the value of a solar tariff that encourages distributed solar installers to optimize the direction that solar panels face to provide more kWh during the utility's peak and provide maximum benefits for all utility customers.
5. Assess the benefits of providing a utility return on power purchase agreements as an alternative to utility ownership to create a win-win for consumers and the utility.
6. Explore what would be the right metrics for moving to performance-based regulation rather than cost of service regulation for generation assets, such as incentivizing energy and capacity procurement through contracts rather than capital investment.

Respectfully submitted,

/s/ Henry Robertson

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CERTIFICATE OF SERVICE

I hereby certify that a true and correct PDF version of the foregoing was filed on EFIS and sent by email on this 29th day of September, 2020, to all counsel of record.

/s/ Henry Robertson

Henry Robertson