

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)
Triennial Compliance Filing or Next Annual)
Update Report)

File No. EO-2021-0069

SIERRA CLUB’S LIST OF SUGGESTED SPECIAL CONTEMPORARY ISSUES

Pursuant to 20 CSR 4240-22.080(4), Sierra Club hereby recommends the following as special contemporary issues for consideration and analysis by Ameren Missouri:

1. Analyze and document on a unit-by-unit basis the net present value revenue requirement of the relative economics of continuing to operate each Ameren coal-fired generating unit versus retiring and replacing each such unit in light of the total costs (fuel, capital, and non-fuel O&M costs) needed to keep each unit operating as compared to the cost of other supply-side and demand-side resources.
2. Analyze the comparative public health impacts of each of the alternative resource plans considered by the Company. At a minimum, Ameren should quantify the public health cost that various air pollutants have on public health, including, but not limited to, sulfur dioxide (SO₂), nitrogen oxides (NO_x), particulate matter (PM), and mercury.
3. Analyze and develop as candidate resource options the satisfaction of municipal and corporate renewable energy goals. The St. Louis Board of Aldermen has formulated a plan to have the City’s electricity sector be met entirely by efficiency and renewable resources by 2035. As elements of that plan are enacted by ordinance, such elements will be a legal mandate subject to the planning requirements of 20 CSR 4240-22.060(3)(A).

Other cities within Ameren's service territory have pledged to meet similar goals.

Regardless of whether such goals amount to a legal mandate, they present alternatives that should be modeled.

4. Analyze and document whether inclusion of an all-source procurement (e.g., an all-source request for proposals or request for information) into Ameren's IRP process could have benefits for customers.
5. Analyze and document the prospects for using securitization to support cost-effective accelerated retirement of coal generation assets and to channel the savings into cost-effective investments such as demand-side management, wind and solar generation, and storage.
6. Develop and document for use in all economic modeling and resource planning reasonable natural gas prices and CO₂ prices that fully account for the risks to Missouri customers associated with the climate crisis and climate risk.
7. Analyze and document the costs of putting flue gas desulfurization and dry sorbent injection technology on Rush Island and Labadie, respectively.
8. Analyze and document the future capital and operating costs faced by each Ameren coal-fired generating unit in order to comply with all existing, pending, or potential environmental standards, including:
 - a. Clean Air Act New Source Review provisions;
 - b. 1-hour Sulfur Dioxide National Ambient Air Quality Standard;
 - c. National Ambient Air Quality Standards for ozone and fine particulate matter;
 - d. Cross-State Air Pollution Rule;
 - e. Mercury and Air Toxics Standards;

- f. Clean Water Act Section 316(b) Cooling Water Intake Standards;
 - g. Clean Water Act Steam Electric Effluent Limitation Guidelines;
 - h. Coal Combustion Waste rules, including compliance with removal of CCR; and
 - i. Clean Air Act Regional Haze requirements.
9. Analyze and document the cost of any transmission grid upgrades or additions needed to address transmission grid reliability, stability, or voltage support impacts that could result from the retirement of any existing Ameren coal-fired generating unit.
10. Analyze and document the criteria by which units are assigned various operational designations (e.g., “must run”) for use in all Company economic modeling and resource planning.
11. Analyze and document, using Ameren’s own pertinent variable cost of product data, whether Ameren is bidding generation resources into the MISO energy market at below production costs, committing resources as “must run” even when Ameren expects to incur a negative energy market margin, or otherwise is harming ratepayers through its reliance on “must run” designations.
12. Analyze and screen electric vehicle charging infrastructure as a candidate resource option.

Respectfully submitted,

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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