

**STATE OF MISSOURI  
PUBLIC SERVICE COMMISSION**

At a session of the Public Service  
Commission held by telephone  
and internet audio conference  
on the 7th day of October,  
2020.

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-2020-0328**

**NOTICE REGARDING RENEWABLE ENERGY STANDARD  
COMPLIANCE REPORT AND COMPLIANCE PLAN**

Issue Date: October 7, 2020

On April 15, 2020, Union Electric Company d/b/a Ameren Missouri filed its 2019 Renewable Energy Standard Compliance Report<sup>1</sup> and RES Compliance Plan for the calendar years 2020 through 2022, as required by Commission Rule 20 CSR 4240-20.100(8). Commission Rule 20 CSR 4240-20.100(8)(D) requires the Staff of the Commission (Staff) to review RES compliance reports and plans and file a report of its review within 45 days.

Staff filed a report on May 29, 2020, and reported no deficiencies in the 2020 RES Compliance Plan, but requested an extension to allow additional time to consult with Ameren Missouri regarding the 2019 RES Compliance Report. Staff filed a report on June 12, 2020, which it corrected on June 19, 2020, and reported Ameren Missouri retired enough renewable energy credits (RECs) to meet renewable energy standard

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<sup>1</sup> On June 8, 2020, Ameren Missouri filed a corrected Exhibit 7 to its 2019 RES Compliance Report.

requirements. In addition, Staff recommended Ameren Missouri apply for a “waiver” of Commission Rule 20 CSR 4240-20.100(8)(A)1.I.

Commission Rule 20 CSR 4240-20.100(8)(E) allows the Office of the Public Counsel and other interested persons or entities to file comments regarding RES reports and plans. On June 12, 2020, Sierra Club filed comments questioning a statement in Staff’s June 12, 2020 report, which indicated Ameren Missouri was still responding to inquiries from Staff when the report was filed. On June 19, 2020, Staff filed a *Notice of Correction*, indicating the statement was made in error. In addition, Sierra Club’s comments questioned the eligibility of some RECs claimed by Ameren Missouri and indicated Sierra Club opposed a “waiver” of 20 CSR 4240-20.100(8)(A)1.I.

#### **Variance granted in File No. EE-2020-0411**

As recommended by Staff, Ameren Missouri on June 23, 2020, filed an application seeking variance from Commission Rule 20 CSR 4240-20.100(8)(A)1.I in its 2019 RES Compliance Report. The application was assigned File No. EE-2020-0411. The variance request was intended to excuse Ameren Missouri from the obligation of providing certain types of information required to be disclosed in RES Compliance Reports.

The Commission granted intervention requests from Sierra Club and Missouri Industrial Energy Consumers in File No. EE-2020-0411. On July 22, 2020, Staff filed its recommendation that the Commission grant Ameren Missouri’s request for variance. Staff advised the Commission that the applicable information required by the rule was either provided by Ameren Missouri or is available to the Commission through the North American Renewables Registry (NAR). The Commission designated NAR to track and verify the trading of RECs. Staff’s recommendation was further clarified at the

Commission's direction with a supplemental recommendation filed on August 7, 2020. No party opposed Staff's recommendation to approve the application for variance. On August 26, 2020, the Commission approved Ameren Missouri's request for variance in File No. EE-2020-0411, effective September 25, 2020.

As the Commission has granted Ameren Missouri a variance as to its 2019 RES Compliance Report effective September 25, 2020, the Commission can now take up Ameren Missouri's 2019 RES Compliance Report and 2020 RES Compliance Plan, filed in this case.

The Commission rule provides that, upon review of RES compliance plans and reports: "[t]he Commission may direct the electric utility to provide additional information or to address any concerns or deficiencies identified in the comments of [S]taff or other interested person or entities."<sup>2</sup> After considering Staff's recommendation and based on the variance granted in File No. EE-2020-0411, the Commission concludes no further order in this matter is appropriate at this time.



**BY THE COMMISSION**

A handwritten signature in black ink that reads "Morris L. Woodruff".

Morris L. Woodruff  
Secretary

Silvey, Chm., Kenney, Rupp, Coleman, and  
Holsman CC., concur.

Jacobs, Regulatory Law Judge

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<sup>2</sup> 20 CSR 4240-20.100(8)(F).