

**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 Renewable)
Energy Standard Compliance Plan and)
Renewable Energy Compliance Report)
Pursuant to 20 CSR 4240-20.100)
FILE NO. EO-2022-0283

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 14, 2022,¹ Union Electric Company d/b/a Ameren Missouri (Ameren Missouri) filed its Renewable Energy Standard (“RES”) Compliance Plan (Compliance Plan) for calendar years 2022 through 2024 and its 2021 RES Compliance Report (Compliance Report), as required by 20 CSR 4240-20.100 (8).

2. Rule 20 CSR 4240-20.100 (8)(D) requires Staff to review Ameren Missouri’s Compliance Plan and Compliance Report and file a Staff report within 45 days of their filing. On May 26, the Commission extended that deadline and ordered Staff to respond to the Compliance Plan and Compliance Report no later than July 15.²

3. Rule 20 CSR 4240-20.100(8)(B) 1.A. through 1.G sets out the basic requirements for RES Compliance Plans. Based on its review, Staff has concluded that Ameren Missouri’s Compliance Plan for 2022 through 2024 has met these requirements.

¹ All date references shall be to 2022 unless otherwise stated.

² “Annual RES Compliance Report and RES Compliance Plan. Each electric utility shall file a 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. 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.”

4. Rule 20 CSR 4240-20.100(8)(A)1 through 3 sets out the information required in Annual RES Compliance Reports. Rule 20 CSR 4240-20.100(3)(J) allows for up to 10% of required RECs to be retired between January 1 and April 15 of the following year.³ On November 12, 2021, Ameren Missouri was granted a variance of this rule in Case No. EE-2022-0074 for the calendar year 2021. Staff has completed its review of Ameren Missouri's 2021 Compliance Report and verified Ameren Missouri has retired sufficient RECs to satisfy the 2021 RES requirements. Staff has not identified any deficiencies in the Compliance Report. Staff, however, has noted an error in Ameren Missouri's reporting of its Missouri jurisdictional revenue.

WHEREFORE, Staff tenders its Staff Report on Ameren Missouri's 2022 through 2024 RES Compliance Plan and its 2021 Compliance Report.

Respectfully submitted,

/s/ Paul T. Graham

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³ "RECs retired from January 1 through April 15 of the following year, to be counted towards compliance for the previous calendar year in accordance with this subsection shall not exceed ten percent (10%) of the total RECs necessary to be retired for compliance for that calendar year."

CERTIFICATE OF SERVICE

The undersigned certifies by his signature below that on July 15, 2022, he filed the above document entitled STAFF REPORT in the EFIS file of the Missouri Public Service Commission.

/s/ Paul T. Graham