

**STATE OF MISSOURI  
PUBLIC SERVICE COMMISSION**

At a session of the Public Service Commission held at its office in Jefferson City on the 1<sup>st</sup> day of September, 2021.

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-2021-0352**

**NOTICE REGARDING RENEWABLE ENERGY STANDARD  
COMPLIANCE REPORT AND COMPLIANCE PLAN  
AND ORDER GRANTING VARIANCE**

Issue Date: September 1, 2021

Effective Date: October 1, 2021

On April 15, 2021, Union Electric Company d/b/a Ameren Missouri filed its 2020 Renewable Energy Standard (RES) Compliance Report and 2021 RES Compliance Plan<sup>1</sup> as required by Commission Rule 20 CSR 4240-20.100(8). The Staff of the Commission (Staff) reviewed the Compliance Report and Compliance Plan and filed a report on June 1, 2021.

Staff reported that Ameren Missouri had met the minimum requirements for its Compliance Plan. Staff stated that while it had not identified any deficiencies in the Compliance Plan, it was not making any recommendation with regard to whether the method of complying with the RES was “the least cost, prudent method in complying with the RES, and suggests the Commission be clear in any Order it may issue in this case that it is not making any ratemaking determination.”<sup>2</sup>

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<sup>1</sup> The Compliance Plan covers the calendar years 2021 through 2023.

<sup>2</sup> *Staff Report* (filed June 1, 2021), Memorandum, Renewable Energy Standard Compliance Plan 2021-2023 for Union Electric Company, d/b/a Ameren Missouri, p. 4.

With regard to the Compliance Report, Staff reported that Ameren Missouri retired enough renewable energy credits (RECs) to meet renewable energy standard requirements. However, Staff also found several reporting deficiencies related to third party REC purchases. Even with these reporting deficiencies, Staff reported that it was able to verify the retirement of the RECs utilizing the North American Renewables Registry (NAR). Staff recommended Ameren Missouri apply for a variance from Commission Rule 20 CSR 4240-20.100(8)(A)1.I to remedy these reporting deficiencies.<sup>3</sup>

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. No comments were filed.

On July 1, 2021, as recommended by Staff, Ameren Missouri filed a request for a variance from Commission Rule 20 CSR 4240-20.100(8)(A)1.I. The variance request is intended to excuse Ameren Missouri from the obligation of providing certain types of information required to be disclosed in RES Compliance Reports. The Commission has designated the NAR to track and verify the trading of RECs. Staff advised in its report that it was able to identify or confirm the required information using the NAR.

Commission Rule 20 CSR 4240-20.100(11) allows the Commission to grant a variance, for good cause, from any provision of the rule requiring RES compliance plans and reports. The Commission has reviewed and considered Staff's report and Ameren Missouri's request for variance. The Commission finds that good cause exists to grant Ameren Missouri a variance based on a finding that some categories of information

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<sup>3</sup> Ameren Missouri was granted a similar variance for its 2019 Compliance Report in File No. EE-2020-0411.

regarding third party REC purchases are not directly available to Ameren Missouri and the information can be verified by Staff through the NAR.

Ameren Missouri's application does not expressly request the variance to apply to future reports. As no grounds have been stated in this case to allow the Commission to consider whether a variance granted in this case ought to apply to future reporting periods, the variance granted in this order applies only to Ameren Missouri's 2020 RES Compliance Report.

As for the 2021 RES Compliance Plan, the Commission rule further 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>4</sup> After considering Staff's report and granting the requested variance, the Commission concludes no further order in this matter is necessary.

**THE COMMISSION ORDERS THAT:**

1. Ameren Missouri is granted a variance from Commission Rule 20 CSR 4240-20.100(8)(A)1.I(I), (II), (III), and (V) with regard to the third party REC purchases lawfully registered in the NAR.
2. The variance granted by this order applies to Ameren Missouri's 2020 RES Compliance Report filed on April 15, 2021.
3. This order shall be effective on October 1, 2021.
4. This file shall close on October 2, 2021.

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<sup>4</sup> 20 CSR 4240-20.100(8)(E).



**BY THE COMMISSION**

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

Morris L. Woodruff  
Secretary

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

Dippell, Deputy Chief Regulatory Law Judge


**STATE OF MISSOURI**

**OFFICE OF THE PUBLIC SERVICE COMMISSION**

**I have compared the preceding copy with the original on file in this office and I do hereby certify the same to be a true copy therefrom and the whole thereof.**

**WITNESS my hand and seal of the Public Service Commission, at Jefferson City, Missouri, this 1<sup>st</sup> day of September, 2021.**



  
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**Morris L. Woodruff**  
**Secretary**

**MISSOURI PUBLIC SERVICE COMMISSION**

**September 1, 2021**

**File/Case No. EO-2021-0352**

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**Enclosed find a certified copy of an Order or Notice issued in the above-referenced matter(s).**

**Sincerely,**



**Morris L. Woodruff  
Secretary**

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Recipients listed above with a valid e-mail address will receive electronic service. Recipients without a valid e-mail address will receive paper service.