

**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 the                         ) **File No. EO-2023-0359**  
Renewable Energy Standard Compliance                     )  
Plan for 2023-2025   )

**STAFF REPORT**

**COMES NOW** the Staff of the Missouri Public Service Commission (“Staff”), by and through counsel, and for its Staff Report, states as follows:

1. On April 14, 2023, Union Electric Company d/b/a Ameren Missouri (“Ameren Missouri”) filed its Renewable Energy Standard (RES) Compliance Plan for calendar years 2023 through 2025 and its 2022 RES 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 30, 2023, Staff requested an extension of the deadline and the Commission granted the request, ordering Staff to respond to the Compliance Plan and Compliance Report no later than June 29, 2023.

3. Rule 20 CSR 4240-20.100(8)(B) establishes fundamental standards for RES Compliance Plans. Staff concluded that Ameren Missouri’s Compliance Plan for 2023 through 2025 complies with those standards.

4. Rule 20 CSR 4240-20.100(3)(J) requires that at least 90% of RECs that are retired for compliance be retired in the calendar year for which compliance is sought. 10% of RECs may be retired between January 1 and April 15 of the following year. Ameren Missouri requested a variance of this rule for calendar year 2022 in Case No. EE-2023-0127, which the Commission granted in its Order Granting Variance and Waiver issued on November 30, 2022.

5. Ameren Missouri requested a variance of 20 CSR 4240-20.100(8)(A)1.I., 20 CSR 4240-20.100(8)(A)2., and 20 CSR 4240-20.100(8)(A)1.J. in Case No. EE-2023-0409.

6. Staff recommends that the Commission grant the variance for 20 CSR 4240-20.100(8)(A)1.I. for the third-party REC purchases. Ameren provided supplemental information on the purchases in lieu of this rule. Furthermore, the producing facilities have been certified by the Missouri Department of Natural Resources Division of Energy, and the RECs have been properly registered in the Commission's approved tracking system, the North American Renewables Registry.

7. Staff recommends the Commission reject the variance for 20 CSR 4240-20.100(8)(A)1.J. for reporting on customer-owned systems. Ameren Missouri provided the required information under this rule for certified systems and does not need a variance. Should the Commission grant a variance to this rule, it could obstruct compliance with Ameren's tariff, which requires this information of customer generators in the interconnection application and for billing. Furthermore, this information is necessary for determining the amount of solar rebates to be paid and prorating the amount of RECs received from customer generation aggregations in the first and final years.

8. Staff has not made a ratemaking determination as to whether the Plan is the least expensive or prudent method for complying with the RES. Staff recommends that the Commission be explicit in any Order it may issue in this case that it is not making a ratemaking determination.

9. Staff conducted its review of Ameren Missouri's Plan as discussed in detail in Staff's Memorandums, attached and incorporated herein as Attachment A and B. Ameren Missouri has met the minimum requirements of 20 CSR 4240-20.100(8)(B). If the Commission grants Ameren Missouri's requested variance for 20 CSR 4240-20.100(8)(A)1.I., the variance will resolve deficiencies in the utility's 2022 Compliance Report.

**WHEREFORE**, Staff tenders its Staff Report on Ameren Missouri's 2023 through 2025 RES Compliance Plan and its 2022 Compliance Report.

Respectfully submitted,

**/s/ Eric Vandergriff**

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**CERTIFICATE OF SERVICE**

I hereby certify that copies of the foregoing have been mailed or hand-delivered, transmitted by facsimile or electronically mailed to all parties and/or counsel of record on this 29<sup>th</sup> day of June, 2023.

**/s/ Eric Vandergriff**