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/Feasibility Analysis
Witness: Cedric E. Cunigan, PE
Sponsoring Party: MoPSC Staff
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Case No.: EA-2023-0286
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MISSOURI PUBLIC SERVICE COMMISSION
INDUSTRY ANALYSIS DIVISION
ENGINEERING ANALYSIS DEPARTMENT

REBUTTAL TESTIMONY

OF

CEDRIC E. CUNIGAN, PE

**UNION ELECTRIC COMPANY,
d/b/a AMEREN MISSOURI**

CASE NO. EA-2023-0286

Jefferson City, Missouri
October 2023

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CEDRIC E. CUNIGAN, PE
UNION ELECTRIC COMPANY,
d/b/a AMEREN MISSOURI
CASE NO. EA-2023-0286**

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1 **REBUTTAL TESTIMONY**

2 **OF**

3 **CEDRIC E. CUNIGAN, PE**

4 **UNION ELECTRIC COMPANY,**
5 **d/b/a AMEREN MISSOURI**

6 **CASE NO. EA-2023-0286**

7 Q. Please state your name and business address.

8 A. My name is Cedric E. Cunigan. My business address is 200 Madison Street,
9 Jefferson City, Missouri 65101.

10 Q. By whom are you employed and in what capacity?

11 A. I am employed by the Missouri Public Service Commission (“Commission”)
12 as a Senior Professional Engineer in the Engineering Analysis Department, Industry
13 Analysis Division.

14 Q. Please describe your educational background and work experience.

15 A. Please refer to Schedule CEC-r1 attached to this Rebuttal testimony for my
16 credentials and a list of cases which I have filed testimony or recommendations.

17 **EXECUTIVE SUMMARY**

18 Q. What is the purpose of your rebuttal testimony?

19 A. I will be responding to Ameren Missouri’s application and witnesses regarding
20 Renewable Energy Standard (“RES”) Compliance and need for Renewable Energy Credits
21 (“RECs”), Project risks, Project selection, site selection, and issues at existing renewable
22 facilities.

1 **RES COMPLIANCE**

2 Q. What is the RES?

3 A. The RES is a state law that requires a certain portion of an electric utility's
4 generation to be supplied by renewable resources.¹ The RES also sets out the method for
5 tracking renewable energy generated through RECs, reporting requirements, and planning
6 requirements, among other items. Currently, a utility must supply 15% of its energy sold
7 through renewable generation sources and/or retire the appropriate amount of RECs.

8 Q. What does Ameren Missouri witness Mr. Steven M. Wills say about the need
9 for renewable resources on page 22 of his direct testimony?

10 A. He states, "It is possible that one or more additional resources could be deployed
11 for RES compliance purposes, which would make them ineligible to use for Renewable
12 Solutions Program² purposes."³

13 Q. Has Ameren Missouri shown a need for additional renewable resources for RES
14 compliance?

15 A. No. Ameren has provided some information and calculations showing a need
16 for RECs in its most recent compliance plan, but did not provide analysis that the proposed plan
17 was the least-cost method of achieving compliance. In Ameren Missouri's most recent RES
18 compliance plan,⁴ Ameren projected a need for RECs during each year of the 2023-2025

¹ Full regulations on the RES can be found in 20 CSR 4240-20.100 Electric Utility Renewable Energy Standard Requirements.

² Program discussed further on page 5 of this testimony.

³ Direct Testimony of Steven M. Wills page 22, lines 10 - 11.

⁴ The RES compliance plan is required to be filed annually and covers RES compliance requirements for the current year and the immediately following two calendar years. Regulations can be found in 20 CSR 4240-20.100 (8)(B). RES Compliance Plan.

1 planning period. The retail rate impact (“RRI”) calculation also showed a need for renewable
2 generation.

3 Q. What is the RRI and how is it calculated?

4 A. The RRI is a calculation that averages the revenue requirement impact of
5 procuring or developing renewable energy resources over a 10-year period. A non-renewable
6 generation and purchased power portfolio is determined by taking the utility’s existing
7 generation and purchased power resource portfolio, excluding all renewable resources, and
8 adding additional non-renewable resources sufficient to meet the utilities needs on a least-cost
9 basis. A RES-compliant portfolio is determined by taking the utility’s existing generation and
10 purchased power portfolio and adding a combination of least-cost renewable resources and
11 least-cost non-renewable resources to meet the RES requirement for renewables and to meet
12 the utility’s needs. The RRI is determined by subtracting the non-renewable generation and
13 purchased power portfolio from the RES-compliant generation and purchased power portfolio
14 on an incremental basis. It is required to be calculated annually and is included in the RES
15 Compliance plan.

16 Q. Did Ameren’s RRI calculation show renewable generation was needed?

17 A. Ameren Missouri’s RRI work paper calculates the number of RECs needed to
18 meet the RES standard in each year over two 10-year terms. ** [REDACTED]

19 [REDACTED]

20 [REDACTED]⁵ [REDACTED]

⁵ MW stands for megawatt, which is a unit of capacity equivalent to 1,000,000 watts.

1 [REDACTED] ⁶ [REDACTED]

2 [REDACTED]

3 [REDACTED] ⁷ ** The Commission approved the 200 MW Huck Finn solar
4 facility in EA-2022-0244; Ameren Missouri pursued this facility for its RES compliance needs.

5 Q. Can you explain the increase in purported needs from the 2022 to the 2023 RRI
6 calculations?

7 A. ** [REDACTED]

8 [REDACTED] ⁸ [REDACTED]

9 [REDACTED]

10 [REDACTED] ⁹ [REDACTED]

11 [REDACTED]

12 [REDACTED]

13 [REDACTED]

14 [REDACTED] ¹⁰ [REDACTED]

15 [REDACTED]

16 [REDACTED]

17 [REDACTED]

⁶ ** [REDACTED] **

⁷ ** [REDACTED] **

⁸ Case No. EO-2023-0359.

⁹ MISO is the regional transmission organization (“RTO”) of which Ameren Missouri is a member. The RTO manages the market for wholesale electricity movement in its service territory.

¹⁰ The P50 level assumes that actual generation will exceed the estimate level 50% of the time. It is a middle ground estimate. The P90 level assumes that actual generation will exceed the estimate level 90% of the time. It is a conservative estimate of production level, which would be lower than the P50 estimate.

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[REDACTED]

[REDACTED] ** The overall change to assumptions leads Staff to question the validity of these new estimates. More justification is needed to show the level of need for these resources and backing that the proposed solution is the least-cost option.

Q. How has Ameren made up shortfalls of RECs in previous years?

A. In the past, Ameren Missouri has purchased RECs to make up for the shortfall. RECs from owned resources could be used to meet the RES requirements, but Ameren Missouri has not shown that this would be the least-cost way to meet the RES requirements.¹¹ Additionally, the amount anticipated to be needed for compliance is less than the proposed 350 MW of additions subject to this request for a Certificate of Convenience and Necessity (“CCN”). Further, Ameren Missouri has suggested the potential use of some of these resources as part of the Renewable Solutions Program (“RSP”), which would disqualify the RECs from being used for compliance.

Q. Describe the RSP.

A. The RSP is a program offered through Ameren Missouri’s tariff that allows eligible customers to receive renewable energy from a renewable energy resource for a period of 15 years. The participants pay a predetermined renewable resource charge. Participants receive a renewable benefits credit proportional to their share of the renewable energy resource on their monthly energy statement. The program can be found on sheets 83-83.6 of Ameren Missouri’s tariff, MO P.S.C. Schedule No. 6.

¹¹ 20 CSR 4240-20.100 (8)(B)1.E. requires a detailed analysis providing information necessary to verify that the RES compliance plan is the least cost, prudent methodology to achieve compliance with the RES.

1 Q. Does Staff have issues with the RSP program?

2 A. Yes. The RSP program offers a chance for subscribers to pay for a portion of the
3 resource in exchange for a portion of the energy output. The subscribers still pay their actual
4 billed usage and receive a credit for the portion of energy attributed to them from the RSP
5 program. Essentially, the only thing that the subscribers are receiving through the RSP is a
6 REC. The way that the program is priced, however, allows subscribers to pay a fixed charge
7 and receive a variable credit. The net charge does little to actually cover the cost of the resource,
8 and customers that are not participants in the program cover the remaining costs of the resource,
9 while not receiving the benefits of the energy or RECs during the 15 years of the program phase.
10 Non-participating customers may be better served if Ameren Missouri sold excess RECs at
11 market price.

12 Q. What improvements could be made to the RSP program?

13 A. Staff recommends calculation of the charges/credits to be simplified and tracked
14 more closely with actual REC prices charged in the same period as the charges/credits. Staff
15 also recommends a shorter timeframe for the charge to be locked in, similar to net metering or
16 cogeneration rates¹² as opposed to the 15-year timeframe currently in the program.

17 **PROJECT RISKS**

18 Q. What risks has Staff identified with the projects?

19 A. Staff has identified risks from lack of locational diversity, the lack of the
20 proposed resources to fully meet Ameren's proposed need, and risk of cost over-runs.

21 Q. What are the concerns with locational diversity?

¹² Net metering and cogeneration rates are recalculated every 2 years. 20 CSR 4240-20.060 Cogeneration (4) Rates for Purchases.

1 A. Locational diversity is useful to have in that it allows energy to be placed onto
2 the distribution grid at different locations, providing better reliability, potentially lowering
3 congestion, and meeting load. One major component of reliability with solar is weather patterns
4 and cloud cover. We would anticipate these sites experiencing the same adverse weather events
5 in sequence, if not concurrently. While Ameren Missouri witness Ajay K. Arora speaks to the
6 importance of geographical diversity, he fails to mention that their proposed projects are
7 actually located within 80-miles. Scott Wibbenmeyer provides a map of the approximate
8 locations in Figure 1 of his direct testimony.

9
Figure 1. Map of Solar Projects



10

1 The locations furthest from each other, Split Rail and Cass County, are roughly 80 miles
2 apart. Vandalia and Bowling Green are roughly 15 miles apart. This is not a significant distance
3 to mitigate interactions with weather that could be expected with a solar facility. Staff witness
4 Krishna L. Poudel, PhD speaks on this topic further.

5 Q. What is Staff's concern about the ability of the projects to meet Ameren's
6 purported capacity needs?

7 A. The renewable projects are not expected to be enough to meet Ameren
8 Missouri's load. Ameren Missouri provided charts showing load/ generation projections for
9 several different time frames in the direct testimony of Matt Michels.¹³ The figures show that
10 even with additions from the PRP, Ameren Missouri will still be unable to meet load in the late
11 afternoon. Ameren Missouri stated the following in response to Staff Data Request No. 0077:

12 The charts do not reflect utilization of existing or new peaking
13 dispatchable resources, which can be dispatched to meet load over a few
14 hours during peak conditions. The company continues to evaluate its
15 need for dispatchable resources to integrate its planned renewable
16 additions as part of the development of its 2023 IRP...

17 The need for dispatchable resources should be analyzed with the addition of renewables
18 and concurrently with this CCN. If the need is for energy or capacity, and one solution will
19 need a combination of resources to solve the problem, then everything necessary for that
20 solution should be considered under the same approval. Staff witness Brad J. Fortson discusses
21 the Integrated Resource Planning ("IRP") process and how Ameren's reliance on the IRP for
22 justification of these projects is problematic.

23 Q. What are Staff's concerns regarding project cost over-runs?

¹³ Direct Testimony of Matt Michels Figures 18-21, on pages 41-44.

1 A. There are three contract types between the four projects. Vandalia and Bowling
2 Green are using an Engineering, Procurement, & Construction (“EPC”) contractor, Cass
3 County uses a purchase sale agreement (“PSA”), and Split Rail uses a build transfer agreement
4 (“BTA”). The PSA with Cass County is fully executed and has a final price indicated. The
5 BTA with Split Rail has a contract ceiling, but final costs have not been determined. For
6 Vandalia and Bowling Green, Ameren Missouri is choosing to supply its own main
7 transformers, but will be relying on EDF Renewables to procure other components. The highest
8 risk of project over runs is with Vandalia and Bowling Green, which are the smallest projects.
9 A big component of the potential for price overruns is the antidumping and countervailing
10 duties (“AD/CVD”) that the U.S Department of Commerce will be enforcing after December 6,
11 2024.¹⁴ Ameren Missouri anticipates completion of Cass County prior to the December 2024
12 deadline. For Split Rail, ** [REDACTED]

13 [REDACTED]
14 [REDACTED]
15 [REDACTED]
16 [REDACTED] **

17 **PROJECT SELECTION**

18 Q. How did Ameren Missouri select these projects?

¹⁴ The U.S. Department of Commerce found that certain Chinese producers are shipping their solar products through Cambodia, Malaysia, Thailand, and/or Vietnam for minor processing in an attempt to avoid paying antidumping and countervailing duties (“AD/CVD”). Pursuant to the [Presidential Proclamation issued on June 6, 2022](#), duties will not be collected on any solar module and cell imports from these four countries until June 2024, as long as the imports are consumed in the U.S. market within six months of the termination of the President’s Proclamation.

1 A. Ameren Missouri issued four RFPs, two for wind projects in 2020 and 2022, and
2 two for solar projects in 2020 and 2022. The projects were evaluated by Ameren Missouri and
3 1898 & Co.¹⁵ The scorecards were attached to the response to Staff Data Request No. 0003.

4 Q. Does Staff have any concerns with the evaluation process?

5 A. Yes. ** [REDACTED]
6 [REDACTED]
7 [REDACTED]
8 [REDACTED]
9 [REDACTED]
10 [REDACTED]

11 [REDACTED] ** The percentage isn't the problem. The
12 fact that higher capital cost projects are rated higher than lower cost projects is. All else held
13 equal, ranking a higher cost project higher would be the opposite of a prudent decision criteria.

14 Q. Were there other concerns with project selection outside of the RFP evaluations?

15 A. Yes. Ameren Missouri's RFPs were only for wind and solar resources. Staff
16 witness Brad J. Fortson discusses Staff's concern that the alternative resource plans ("ARP") in
17 Ameren's IRP are similar and do not provide a good comparison of generation portfolios or
18 justify a specific project.¹⁶ Additionally, Staff witness Shawn E. Lange, PE discusses the lack
19 of purchased power agreements ("PPAs") being considered to meet Ameren Missouri's needs.¹⁷

¹⁵ 1898 & Co. is a consulting company that is a part of Burns & McDonnell.

¹⁶ See Rebuttal Testimony of Staff witness Brad J. Fortson.

¹⁷ See Rebuttal Testimony of Staff witness Shawn E. Lange, PE.

1 **ISSUES AT EXISTING FACILITIES**

2 Q. What does Ameren Missouri witness Mr. Ajay K. Arora state about experience
3 Ameren Missouri seeks to gain with these projects on page 22 of his direct testimony?

4 A. He states that Ameren Missouri hopes to gain experience in two areas:

5 1) The ability to assess when and to what extent renewable energy is truly
6 available over a wide range of weather conditions, which is dependent in large
7 part on the location of the renewable resource, and

8 2) An understanding of how the existing Ameren Missouri generation fleet may
9 need to be dispatched differently than historical dispatch patterns to provide
10 critical back-up generation during hours that intermittent renewable
11 generation is not available.

12 Q. What is Staff's opinion on that statement?

13 A. While it is possible that Ameren Missouri could gain this experience through
14 operating these facilities, Ameren Missouri already has a significant amount of solar generation
15 from which it can learn these practices. Weather patterns affect the smaller scale generation
16 facilities in a similar manner to larger scale facilities and the lessons learned from Ameren
17 Missouri's existing portfolio could be scaled up accordingly. The same can be said for planned
18 and preventative maintenance approaches on existing facilities being scaled up for size.
19 Specifically, Ameren Missouri was required to file reports in Case No. EA-2016-0207 that
20 included "insights into the advantages and challenges associated with distributed generation
21 resources on the Ameren Missouri grid. Testing the deployment, this small-scale pilot project
22 may be helpful in developing real time solutions for distributed generation." Ameren has filed

1 the reports as required, but has provided little to no information regarding the advantages and
2 challenges associated with distributed generation resources on the Ameren Missouri grid in
3 those reports.

4 Q. Is Staff aware of any issues with Ameren owned renewable facilities?

5 A. Yes. High Prairie Wind farm has had operations significantly curtailed during
6 the night to protect bats. The facility now produces much less power than originally anticipated,
7 due to the drastically reduced operating time. In Case No. ER-2022-0337, Staff estimated the
8 curtailed generation and recommended a disallowance. The estimated lost value for that
9 generation was as follows:

10 Lost Off-system sales Revenue	\$14,526,194
Lost PTCs	\$14,754,013
Value of lost RECs	\$2,890,841

11
12 The projects subject to this CCN are at different stages of development and have not
13 completed all environmental studies at this time. Cass County has identified three different
14 species of animals that are impacted and will require mitigation measures. The full extent of
15 environmental concerns that would affect the operation or construction for these facilities is
16 still unclear at this time.

17 Q. Please summarize your testimony.

18 A. Staff came to the following conclusions regarding Ameren's application for
19 CCN:

Rebuttal Testimony of
Cedric E. Cunigan, PE

- 1 • The need for the projects has not been fully justified by Ameren as either a
2 least-cost RES compliance resource or the most prudent way to meet Ameren's
3 capacity needs.
4 • There are still unknown environmental risks for several of the projects at this
5 time.
6 • The claim of a need for geographical diversity of renewable facilities is not
7 justified given the close proximity of these facilities.

8 Q. What is your recommendation?

9 A. My testimony adds support to Staff's overall recommendation as set forth by
10 Staff witness James A. Busch.

11 Q. Does this conclude your Rebuttal testimony?

12 A. Yes it does.

BEFORE THE PUBLIC SERVICE COMMISSION

OF THE STATE OF MISSOURI

In the Matter of the Application of Union)
Electric Company d/b/a Ameren Missouri for) Case No. EA-2023-0286
Permission and Approval and Certificates of)
Public Convenience and Necessity Authorizing)
it to Construct Renewable Generation Facilities)

AFFIDAVIT OF CEDRIC E. CUNIGAN, PE

STATE OF MISSOURI)
) ss.
COUNTY OF COLE)

COMES NOW CEDRIC E. CUNIGAN, PE and on his oath declares that he is of sound mind and lawful age; that he contributed to the foregoing *Rebuttal Testimony of Cedric E. Cunigan, PE*; and that the same is true and correct according to his best knowledge and belief.

Further the Affiant sayeth not.




CEDRIC E. CUNIGAN, PE

JURAT

Subscribed and sworn before me, a duly constituted and authorized Notary Public, in and for the County of Cole, State of Missouri, at my office in Jefferson City, on this 5th day of October 2023.

D. SUZIE MANKIN
Notary Public - Notary Seal
State of Missouri
Commissioned for Cole County
My Commission Expires: April 04, 2025
Commission Number: 12412070



Notary Public

Cedric E. Cunigan, PE

PRESENT POSITION:

I am a Senior Professional Engineer in the Engineering Analysis Department, Industry Analysis Division, of the Missouri Public Service Commission.

EDUCATIONAL BACKGROUND AND WORK EXPERIENCE:

In May 2011, I earned a Bachelor of Science in Biological Engineering from the University of Missouri, in Columbia. In May 2013, I earned a Master of Business Administration, also from the University of Missouri. I began work with the Missouri Department of Natural Resources Solid Waste Management Program in August 2013. I started as a Technician and was promoted to an Environmental Engineer I in January 2014. I transferred to the Hazardous Waste Program in September 2014. In January 2015, I was promoted to an Environmental Engineer II. I ended employment with the Department of Natural Resources in January of 2017 and began work with the Missouri Public Service Commission as a Utility Engineering Specialist III. I received my professional engineer’s license in October 2021. In November 2022, I was promoted to Senior Professional Engineer.

Summary of Case Involvement:

Case Number	Utility	Type	Issue
EO-2017-0267	Empire District Electric Company	Memorandum	RES Compliance Report and Plan
EO-2017-0270	KCP&L Greater Missouri Operations Company	Memorandum	RES Compliance Report
EO-2017-0272	KCP&L Greater Missouri Operations Company	Memorandum	RES Compliance Plan
EO-2018-0111	Macon Electric Cooperative & City of Marceline	Memorandum	Change of Supplier
EC-2018-0089	Union Electric Company d/b/a Ameren Missouri	Staff Report	Complaint Investigation
EO-2018-0285	Empire District Electric Company	Memorandum	RES Compliance Report and Plan

continued Cedric E. Cunigan, PE

Case Number	Utility	Type	Issue
EO-2018-0289	KCP&L Greater Missouri Operations Company	Memorandum	RES Compliance Report
EO-2018-0291	KCP&L Greater Missouri Operations Company	Memorandum	RES Compliance Plan
ER-2018-0145 & ER-2018-0146	KCPL & KCP&L Greater Missouri Operations Company	Cost of Service Report, Rebuttal, & Surrebuttal	Renewable Energy
WR-2018-0328	Middlefork Water Company	Depreciation Workpapers	Depreciation
EA-2018-0202	Union Electric Company d/b/a Ameren Missouri	Staff Report	Certificate of Convenience and Necessity Application Requirements
EC-2018-0376	Union Electric Company d/b/a Ameren Missouri	Staff Report	Complaint Investigation
EA-2019-0010 & EA-2019-0118	Union Electric Company d/b/a Ameren Missouri	Staff Report	Certificate of Convenience and Necessity Application Requirements
EA-2019-0021	Union Electric Company d/b/a Ameren Missouri	Staff Report	Certificate of Convenience and Necessity Application Requirements
EE-2019-0305	Empire District Electric Company	Memorandum	RES Compliance Report and Plan
EO-2019-0320	Union Electric Company d/b/a Ameren Missouri	Memorandum	RES Compliance Report and Plan
EO-2019-0371	Union Electric Company d/b/a Ameren Missouri	Staff Report	Certificate of Convenience and Necessity Application Requirements
EE-2020-0411	Union Electric Company d/b/a Ameren Missouri	Memorandum	RES Compliance Plan
ET-2020-0259	Empire District Electric Company	Memorandum	Renewable Energy Tariff
EO-2020-0323	Empire District Electric Company	Memorandum	RES Compliance Report and Plan
EO-2020-0328	Union Electric Company d/b/a Ameren Missouri	Memorandum	RES Compliance Report and Plan
EA-2020-0371	Union Electric Company d/b/a Ameren Missouri	Staff Report	Certificate of Convenience and Necessity Application Requirements

Case Number	Utility	Type	Issue
WR-2020-0344	Missouri American Water Company	Cost of Service Report, Rebuttal, and Surrebuttal	Depreciation
SA-2021-0017	Missouri American Water Company	Staff Report	Depreciation
EO-2021-0032	Evergy	Staff Report	Solar Requirements 393.1665 RSMo
SA-2021-0120	Missouri American Water Company	Staff Report	Depreciation
EO-2021-0344	Empire District Electric Company	Memorandum	RES Compliance Report and Plan
EO-2021-0352	Union Electric Company d/b/a Ameren Missouri	Memorandum	RES Compliance Report and Plan
ER-2021-0240	Union Electric Company d/b/a Ameren Missouri	Cost of Service Report, Rebuttal, and Surrebuttal	Depreciation
ER-2021-0312	Empire District Electric Company	Cost of Service Report, Direct, Rebuttal, and Surrebuttal	Depreciation
SR-2021-0372	Mid MO Sanitation, LLC	Disposition Agreement	Depreciation
WA-2021-0391	Missouri American Water Company	Staff Report	Depreciation
ER-2022-0129	Evergy Metro, Inc.	Direct, Rebuttal, Surrebuttal	Renewable Energy Tariff
ER-2022-0130	Evergy Missouri West	Direct, Rebuttal, Surrebuttal	Depreciation, Renewable Energy Tariff
EA-2022-0245	Union Electric Company d/b/a Ameren Missouri	Rebuttal, Surrebuttal	Certificate of Convenience and Necessity Application Requirements
EO-2022-0282	Empire District Electric Company	Memorandum	RES Compliance Report and Plan
EO-2022-0283	Union Electric Company d/b/a Ameren Missouri	Memorandum	RES Compliance Report and Plan
WA-2022-0311	Missouri American Water Company	Memorandum	Depreciation
ER-2022-0337	Union Electric Company d/b/a Ameren Missouri	Direct, Rebuttal, Surrebuttal, True-up Direct	Depreciation and Continuing Property Record
EA-2023-0017	Grain Belt Express, LLC	Rebuttal	Environmental Compliance and Route Selection
GC-2023-0143	Spire Missouri, Inc.	Staff Report	Complaint
ET-2023-0251	Evergy Metro, Inc.	Memorandum	Cogeneration and Net Metering
ET-2023-0252	Evergy Missouri West, Inc.	Memorandum	Cogeneration and Net Metering

continued Cedric E. Cunigan, PE

Case Number	Utility	Type	Issue
EO-2023-0358	Liberty	Memorandum	RES Compliance Report and Plan
EO-2023-0359	Union Electric Company d/b/a Ameren Missouri	Memorandum	RES Compliance Report and Plan
EE-2023-0409	Union Electric Company d/b/a Ameren Missouri	Staff Recommendation	Variance from RES Requirement
EO-2023-0423 & EO-2023-0424	Evergy Metro, Inc. & Evergy Missouri West, Inc.	Staff Memorandum	In-Service Criteria and Public Comments