

**BEFORE THE PUBLIC SERVICE COMMISSION
OF THE STATE OF MISSOURI**

In the Matter of Union Electric Company)
d/b/a Ameren Missouri's Request for a)
Variance Regarding its Renewable)
Energy Standard Compliance)

File No. EE-2020-0411

STAFF SUPPLEMENTAL RECOMMENDATION

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

1. On April 15, 2020, Union Electric d/b/a Ameren Missouri (Ameren Missouri) filed its 2019 Renewable Energy Standard (RES) Compliance Report and 2020 RES Compliance Plan as required by 20 CSR 4240-20.100(8) in Case No. EO-2020-0328.

2. Thereafter the Commission ordered Staff to review the Report and Plan and to file a report within 45 days, which was May 30, 2020.

3. Staff completed its review of Ameren Missouri's 2020 RES Compliance Plan and found no deficiencies. Staff filed its 2020 Report on May 29, 2020 in Case No. 2020-0328.

4. While reviewing Ameren Missouri's 2019 RES Compliance Report, Staff discovered there were deficiencies in the information provided. Staff requested an extension of 13 days, until June 12, 2020, to file its Staff Report on Ameren Missouri's 2019 RES Compliance Report. The Commission granted this request, and Ameren Missouri provided additional information in response to Staff's inquiries.

5. On June 12, 2020, in Case No. EO-2020-0328, Staff filed its 2019 Report, and, as stated on page 1 of the *Memorandum*, verified Ameren Missouri has retired enough RECs to satisfy the 2019 RES requirements. Staff also recommended Ameren

Missouri apply for a waiver of Commission Rule 20 CSR 4240-20.100(8) (A) 1.I.

6. On June 23, 2020, Ameren Missouri filed its *Request for Variance*, opening the current case. Ameren Missouri stated in its Request for Variance that it initially operated under the belief that variances granted in Case No. EO-2012-0150 covered the information it did not possess in its most recent RES report.

7. On July, 22, 2020, Staff filed a recommendation supporting a variance of Commission Rule 20 CSR 4240-20.100(8) (A) 1.I, and stated it views a variance as effective only for the specific reporting period in which it is requested, unless otherwise specified in the Commission's order.

8. On August 4, 2020, the Commission ordered Staff to clarify, or in the alternative, supplement, its recommendation regarding 20 CSR 4240-20.100(8)(A)1.J.

9. Staff does not believe a variance from 20 CSR 4240-20.100(8)(A)1.J is necessary, as Ameren Missouri provided the required information in Exhibit 6 of its initial report in Case No. EO-2020-0328 for customer-generators that have been certified by the Missouri Department of Natural Resources, Division of Energy. Furthermore, it is Staff's understanding that Ameren does record the complete date of interconnection of its own customer-generators. That date is the basis for other time-based requirements, such as the payment of solar rebates (20 CSR 4240-20.100(4)(L)) and transfer of RECs as a condition of receiving a solar rebate (20 CSR 4240-20.065(3) and 20 CSR 4240-20.100(3)(C)).

WHEREFORE, Staff prays the Commission accepts this supplemental recommendation, and denies the variance request for Commission rule 20 CSR 4240-20.100(8)(A)1.J.

Respectfully submitted,

/s/ Nicole Mers

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CERTIFICATE OF SERVICE

I hereby certify that true and correct copies of the foregoing were served electronically to all counsel of record this 7th day of August, 2020.

/s/ Nicole Mers