

**STATE OF MISSOURI
PUBLIC SERVICE COMMISSION**

At a session of the Public Service Commission held at its Office in Jefferson City, Missouri on the 25th day of October, 2023.

In the Matter of a Determination of Special)
Contemporary Resource Planning Issues to be)
Addressed by Ameren Missouri in its Next) **File No. EO-2024-0042**
Triennial Compliance Filing or Next Annual)
Update Report)

**ORDER ESTABLISHING SPECIAL CONTEMPORARY RESOURCE
PLANNING ISSUES**

Issue Date: October 25, 2023

Effective Date: November 4, 2023

A provision in the Commission's electric utility resource planning rule, 20 CSR 4240-22.080(4), requires Missouri's electric utilities to consider and analyze special contemporary issues in their integrated resource plan (IRP) triennial compliance filings or in their annual IRP update reports. The regulation provides that by September 15 of each year, the Commission's Staff (Staff), the Office of the Public Counsel (OPC), and other interested stakeholders may file suggested issues for consideration. The regulation allows the utilities and other stakeholders until October 1 to file comments regarding the suggested issues. The Commission is then to issue an order by November 1 of each year specifying the list of special contemporary issues that each electric utility must address.

OPC and Sierra Club filed suggested special contemporary issues for Union Electric Company d/b/a Ameren Missouri (Ameren Missouri) to analyze and respond to in its annual update IRP Filing. Ameren Missouri filed responses to those suggestions.

The Commission must now determine what special contemporary issues Ameren Missouri should address.

This is not a contested case. The Commission does not need to hear evidence before reaching a decision and does not need to make findings of fact and conclusions of law in announcing that decision.¹ The Commission's rule gives the Commission broad discretion in determining what issues a utility should be required to address, indicating:

[t]he purpose of the contemporary issues lists is to ensure that evolving regulatory, economic, financial, environmental, energy, technical, or customer issues are adequately addressed by each utility in its electric resource planning. Each special contemporary issues list will identify new and evolving issues but may also include other issues such as unresolved deficiencies or concerns from the preceding triennial compliance filing.²

After considering these factors, the Commission will adopt the list of special contemporary issues set forth in this order. The Commission has chosen these issues because they are of particular interest and importance and should be addressed in Ameren Missouri's IRP filing. Ameren Missouri may already plan to address these issues in its triennial IRP filing apart from their designation as special contemporary issues, or it may believe it has already adequately addressed some of these issues in a previous IRP filing, or some other filing. If that is so, it does not need to undertake any additional analysis because of this designation and may simply explain in its upcoming IRP filing exactly where the Commission can find that other analysis. The Commission does not intend that a utility spend an unreasonable amount to address any special contemporary issue. If Ameren Missouri finds that the cost to address a special contemporary issue is

¹ *State ex rel. Public Counsel v. Public Service Com'n*, 259 S.W.3d 23, 29 (Mo. App. W.D. 2008).

² 20 CSR 4240-22.080(4).

excessive, it may explain its concerns in its next IRP filing, while addressing the issue to the extent reasonably possible.

To give Ameren Missouri as much time as possible to examine these issues before its next IRP filing, the Commission will make this order effective in ten days.

THE COMMISSION ORDERS THAT:

1. Ameren Missouri shall analyze and document the following special contemporary issues in its 2024 annual update IRP filing:

A. Model and explicitly present future resource adequacy scenarios based on the following assumptions:

1. With demand-side rates and traditional demand-side management investments (e.g. MEEIA);

2. Only demand-side rates without MEEIA investment;

3. Neither demand-side rates nor MEEIA (but maintain naturally occurring energy efficiency adoption); and

4. Indicate whether or not naturally occurring savings and/or federally-sponsored DSM savings are included in the modeling. If yes, these savings should be identified and separated as well.

5. Include an explicit section within the demand-side management volume and the executive summary where low, medium, and high TOU differentials are modeled and presented with expected demand savings articulated separate and aside from other demand side management practices.

B. Analyze and produce estimated costs for mothballing any dispatchable generation resource that is subject to a planned retirement in the

20-year planning period. Estimates should include all costs including the minimum continued O&M of the mothballed units.

C. Analyze and report on the ability of the planned resource additions in Ameren Missouri's current preferred plan to continue to meet energy needs in all hours of each year.

D. Analyze and report on the ability of the planned resource additions in Ameren Missouri's current preferred plan to provide essential reliability services including the capability of the planned resource to support voltage, frequency, and dispatchability.

E. Analyze the risk to Ameren Missouri's customers of Ameren Missouri relying on just-in-time fuel for electric generation and the interdependent natural gas and electric infrastructure. The report should include the results of the analysis and the measures the utility is taking to mitigate this risk.

F. Model for a low, medium, and high participation scenario of commercial and industrial customers electing to participate in demand response activities based on the introduction of a third-party(s) ARC within its footprint and provide an analysis on what the impact said ARC would have on Ameren Missouri's IRP.

G. Consider in its IRP an application to the U.S. Department of Energy (DOE) Energy Infrastructure Reinvestment Loan Program and discuss any potential benefits this Loan Program may have.

H. Describe the inclusion of Virtual Power Plants (VPP) within the Company's IRP update or triennial analysis. In doing so, identify which distributed

energy resources (DER) or compliment of DERs were included in the analysis, consider both the retail VPP and market-participant VPP perspectives, and explain the benefits and challenges related to scalability attributed of VPPs. Address VPP contributions to the utility’s resource adequacy requirements, grid stability, resiliency, transmission and distribution capacity deferrals, load management strategies, and system optimization. Discuss limitations, if any, to incorporating VPPs in the Company’s distribution or resource planning analysis due to challenges of aggregating and dispatching retail and market-participants’ DERs.

I. In light of the emerging developments around Distributed Energy Resources (DER) and VPPs, address what efforts the Company made in its IRP modeling to address distribution planning opportunities and challenges.

J. Consider discussing storage deployment strategies, including the repurposing of retired automotive batteries, exemplified by the Tesla Pilot program in Australia. Additionally, explore investments in energy storage pilot projects with the specific objective of enhancing the reliability and capacity accreditation of renewable energy resources.

2. This order shall become effective on November 4, 2023.



BY THE COMMISSION

A handwritten signature in cursive script that reads "Nancy Dippell".

Nancy Dippell
Secretary

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

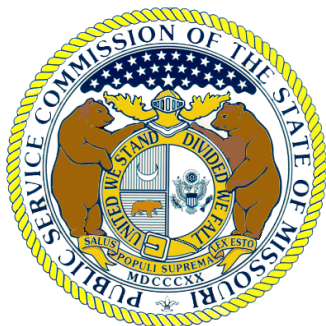
Pridgin, Deputy Chief Regulatory Law Judge

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 25th day of October, 2023.



Nancy Dippell

Nancy Dippell
Secretary

MISSOURI PUBLIC SERVICE COMMISSION

October 25, 2023

File/Case No. EO-2024-0042

MO PSC Staff
Staff Counsel Department
200 Madison Street, Suite 800
P.O. Box 360
Jefferson City, MO 65102
staffcounsel@psc.mo.gov

Office of the Public Counsel (OPC)
Marc Poston
200 Madison Street, Suite 650
P.O. Box 2230
Jefferson City, MO 65102
opc@psc.mo.gov

Clean Grid Alliance
Legal Department
570 Asbury St., Ste. 201
St. Paul, MN 55104

Dutchtown South Community
Corporation
Legal Department
4204 Virginia Ave
319 North 4th Street
St. Louis, MO 63111
srubenstein@greatriverslaw.org

Midwest Energy Consumers Group
Legal Department
308 E. High Street, Suite B101
Jefferson City, MO 65101
tim.opitz@opitzlawfirm.com

Missouri Division of Energy
Legal Department
1101 Riverside Drive, 2nd
Floor
P.O. Box 176
Jefferson City, MO 65102-0176

Missouri Industrial Energy
Consumers (MIEC)
Legal Department
130 S. Bemiston, Suite 200
St. Louis, MO 63105

MO PSC Staff
Travis Pringle
200 Madison Street
Jefferson City, MO 65101
travis.pringle@psc.mo.gov

National Association for the
Advancement of Colored
People
Legal Department
4805 Mt. Hope Drive
Baltimore, MD 21215

Natural Resources Defense Council
Legal Department
20 North Wacker Drive, Suite 1600
Chicago, IL 60606

New Northside Missionary Baptist
Church, Inc.
Legal Department
8645 Goodfellow
Saint Louis, MO 63147
bamorrison@greatriverslaw.org

Renew Missouri
Legal Department
915 East Ash
Columbia, MO 65201

Sierra Club
Ethan Thompson
319 N. Fourth St. Suite 800
St. Louis, MO 63102
ethompson@greatriverslaw.org

Spire
Legal Department
700 Market Street, 6th Floor
St. Louis, MO 63101
matt.aplington@spireenergy.com

Union Electric Company
Wendy Tatro
1901 Chouteau Ave
St. Louis, MO 63103-6149
wtatro@ameren.com

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

Sincerely,

A handwritten signature in black ink that reads "Nancy Dippell". The signature is written in a cursive style with a large, prominent "N" and "D".

**Nancy Dippell
Secretary**

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