

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

In the Matter of the Application of Union Electric)
Company d/b/a Ameren Missouri¹ for Certificates of)
Convenience and Necessity for Solar Facilities) **File No. EA-2023-0286**

**STAFF’S REQUEST FOR EXPEDITED RULING
ON STAFF’S MOTION FOR LOCAL PUBLIC HEARING**

COMES NOW the Staff of the Missouri Public Service Commission (“Staff”), through the undersigned counsel, and asks the Commission for its expedited ruling on Staff’s Motion for Local Public Hearing, stating further:

On October 19, 2023,² Staff filed a Motion for Local Public Hearing. It did so on the basis of the following comment posted on the Commission’s Public Comments on the authority of Pike County Commissioner Brock Bailey:

Rural Missouri is being overwhelmed with Solar projects. The Pike County Commission have had discussions with several concerned citizens and local land owners. We do not have planning and zoning and we have little jurisdiction with regards to these projects. • Have any environmental studies been completed by "third party" or government entities? • Where does the responsibility lie if there is an environmental issue? • What happens if governmental subsidies/funding cease at any time during construction and beyond? (Similar to petroleum) • Will there be any public hearings, considering the community impact of these facilities? Thank you for your time and consideration to this matter. We look forward to hearing from you.

¹ Hereinafter, “Ameren Missouri.”
² All date references will be to 2023 unless otherwise stated.

Staff's motion stated that Staff had verified the communication and explained that Pike County Commissioner Bailey, as Pike County Commissioner and also on the basis of his discussions with Pike County concerned citizens, wanted the Public Service Commission to hold a local public hearing on the questions and concerns which he has raised in the above comment. Since filing its motion, Staff has again communicated with the County Commissioner and verified that a local public hearing is wanted and, indeed, that interest in such a hearing is growing because of the community's perception of an increasing proliferation of renewable energy facilities throughout rural Missouri. Furthermore, and directly apropos the Company's filings in this case, the County Commissioner expressed that Pike County's position on tax waivers for Ameren Missouri had not been resolved, that resolution depended on answers to many questions, and that those questions should be addressed in a local public hearing.

The Commission has not yet ruled on Staff's request for a local public hearing. On November 6, 2023, the Commission issued its Order Suspending Procedural Schedule because of the illness of a witness. Prior to that order, Staff had noticed up the deposition of Commissioner Bailey to speak to the matters set out above. Because of the order suspending the procedural schedule and because, therefore, things might develop rendering such a deposition unnecessary, Staff withdrew its deposition notice. Ameren Missouri's counsel has now circulated a proposed amended procedural schedule, and as stated above, Staff has learned that interest in a local public hearing remains and is growing. Because a local public will impact any procedural schedule, Staff respectfully requests an expedited ruling on its motion for a local public hearing.

WHEREFORE, Staff reiterates its request for a local public hearing and asks for the Commission's expedited ruling.

Respectfully submitted,

/s/ Paul T. Graham #30416

Senior Staff Counsel
Missouri Public Service Commission
P. O. Box 360 Jefferson City, MO 65102
(573) 522-8459 (Telephone)
(573) 751-9285 (Fax)
Paul.graham@psc.mo.

Attorney for Staff of the
Missouri Public Service Commission

CERTIFICATE OF SERVICE

The undersigned certifies by his signature below that on November 16, 2023, he filed the above document entitled Motion for Public Hearing the EFIS file of the Missouri Public Service Commission.

/s/ Paul T. Graham