

# Exhibit No. 302

Issue: Renewable Solutions Program  
Witness: Mark Schuerman  
Type of Exhibit: Surrebuttal Testimony  
Sponsoring Parties: Missouri Industrial Energy Consumers  
Case Nos.: EA-2022-0245  
Date Testimony Prepared: January 18, 2023

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

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In the Matter of the Application of Union Electric )  
Company d/b/a Ameren Missouri for a )  
Certificate of Convenience and Necessity for a ) **Case No. EA-2022-0245**  
Solar Facility, Approval of a Subscription-Based )  
Renewable Energy Program, and Authorization )  
to Establish Tracking Mechanism )  
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Surrebuttal Testimony and Schedule of

**Mark Schuerman**

On behalf of

**The Missouri Industrial Energy Consumers**

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**Case No. EA-2022-0245**

**Surrebuttal Testimony of Mark Schuerman**

1   **Q     PLEASE STATE YOUR NAME AND BUSINESS ADDRESS.**

2   A     My name is Mark Schuerman.   My business address is 800 N. Lindbergh Blvd., St.  
3         Louis, MO 63167.

4   **Q     WHAT IS YOUR OCCUPATION?**

5         I am the Global Product Supply Sustainability Lead with Bayer Crop Science. Bayer  
6         Crop Science LP and Bayer Research and Development Services LLC (both referred  
7         to herein as “Bayer”) are customers of Ameren Missouri and subscribers to the Ameren  
8         Renewable Solutions Program (“Ameren RSP”). Bayer is a life science company with  
9         a more than 150-year history and core competencies in the areas of health care and  
10        agriculture. With our innovative products, we are contributing to finding solutions to  
11        some of the major challenges of our time. The growing and increasingly aging  
12        population requires improved medical care and adequate supply of food. Bayer is  
13        improving people’s quality of life by preventing, alleviating and treating diseases. And  
14        we are helping to provide a reliable supply of high-quality food, feed and plant-based  
15        raw materials.

16   **Q     ON WHOSE BEHALF ARE YOU TESTIFYING IN THIS PROCEEDING?**

1 A I am testifying on behalf of the Missouri Industrial Energy Consumers (“MIEC”), a  
2 Missouri nonprofit corporation that represents the interests of large energy and utility  
3 customers.

4 **Q WHAT ISSUES DOES YOUR TESTIMONY ADDRESS?**

5 A My testimony addresses the importance of Ameren’s Renewable Solutions Program  
6 (“Ameren RSP”) to Bayer’s sustainability efforts and targets.

7 **Q PLEASE EXPLAIN WHY THE AMEREN RSP IS IMPORTANT TO BAYER.**

8 A Bayer wants to be climate neutral by 2030. To accomplish this, we will implement  
9 energy efficiency measures at our sites and, where possible, convert 100 percent of  
10 the purchased electricity to renewable energies. Our targets are in line with the goal  
11 of the Paris Agreement to limit global warming to 1.5 degrees Celsius. We have joined  
12 the world’s leading Science Based Targets initiative, which transparently reviews our  
13 reduction targets. This initiative was founded by the Carbon Disclosure Project (CDP),  
14 the UN Global Compact, the World Resources Institute (WIR) and the World Wide Fund  
15 for Nature (WWF).

16 Bayer has two important sites located in Ameren Missouri’s service territory. Due to  
17 our considerable electricity demand as well as local regulation, Bayer has limited  
18 available options to reach our sustainability targets for those two sites. One option  
19 would be for us to invest in a solar project ourselves; however, we have limited capex  
20 for infrastructure projects and would prefer to invest capex in our core business R&D  
21 and production, allowing both Bayer and Ameren Missouri to concentrate on what each  
22 does best. Another option would be through the purchase of market RECs, but this  
23 would result in higher costs and lower sustainability benefits because it will not  
24 production of additional renewable energy. For these reasons, our best option to

1 accomplish our sustainability targets in Missouri at this time would be to participate in  
2 a program such as that proposed by Ameren Missouri.

3 A **DOES THIS CONCLUDE YOUR TESTIMONY?**

4 A Yes.