

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

In the Matter of the Union Electric Company)
d/b/a Ameren Missouri's Filing of its)
Renewable Energy Standard Compliance)
Plan for 2023-2025)

File No. EO-2024-0231

STAFF REPORT

COMES NOW the Staff of the Missouri Public Service Commission (“Staff”),
by and through counsel, and for its Staff Report, states as follows:

1. On April 15, 2024, Union Electric Company d/b/a Ameren Missouri (“Ameren Missouri”) filed its Renewable Energy Standard (RES) 2023 RES Compliance Report (“Report”) and its Compliance Plan (“Plan”) for calendar years 2024 through 2026 as required by Commission rule 20 CSR 4240-20.100(8).

2. Commission rule 20 CSR 4240-20.100(8)(D) requires Staff to review Ameren Missouri’s Compliance Plan and Compliance Report and file a Staff report within 45 days of their filing.

I. The Report

3. Commission Rule 20 CSR 4240-20.100(8)(A)1.A. through P. provide the minimum filing requirements for the RES Compliance Report.

4. Commission Rule 20 CSR 4240-20.100(3)(J) requires that at least 90% of RECs that are retired for compliance be retired in the calendar year for which compliance is sought. Up to 10% of RECs may be retired between January 1 and April 15 of the following year. Ameren Missouri previously requested and was granted a variance of this rule for calendar year 2023 in Case No. EE-2024-0037.

5. As discussed in greater detail in *Staff's Memorandum*, attached and incorporated herein as Attachment A, Staff identified several errors in the Report. Staff recommends that the Commission direct Ameren Missouri to correct the following in its Report:

- a. Correct (or provide support for) its reported Missouri jurisdictional revenue;
- b. Correct the value of energy reported for High Prairie Renewable Energy Center and Atchison Renewable Energy Center;
- c. Correct the tables on page 9 to include fractional RECs showing the impact of the 1.25 credit for in-state resources; and
- d. Correct the 2023 RES requirements listed on page 8.

II. The Plan

6. Commission Rule 20 CSR 4240-20.100(8)(B)1.A. through G. establishes fundamental standards for RES Compliance Plans. Staff concluded that Ameren Missouri's Compliance Plan for 2024 through 2026 complies with those standards; however, Staff has identified concerns with the Plan.

7. As discussed in greater detail in *Staff's Memorandum*, attached and incorporated herein as Attachment B, Staff recommends that:

- a. Ameren Missouri address its projected retail electric load in its next retail rate impact ("RRI") calculation, or next renewable certificate of convenience and necessity ("CCN") application, by describing and documenting its load assumptions used in its RRI calculation. Staff recommends Ameren Missouri discuss its justification for including or excluding renewable resources from its RRI calculation in all future RRI calculations; and

- b. Ameren Missouri consider requesting authorization from the Commission to offer net-metered customers (who did not receive a solar rebate condition on transferring renewable energy certificates (“RECs”)) a Standard Offer Contract for REC purchases.

8. Staff has not made a ratemaking determination as to whether the Plan is the least expensive or prudent method for complying with the RES. Staff recommends that the Commission be explicit in any Order it may issue in this case that it is not making a ratemaking determination.

WHEREFORE, Staff tenders its Staff Report on Ameren Missouri’s 2023 Compliance Report and 2024 through 2026 RES Compliance Plan.

Respectfully submitted,

/s/ Travis J. Pringle

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CERTIFICATE OF SERVICE

I hereby certify that copies of the foregoing have been mailed or hand-delivered, transmitted by facsimile or electronically mailed to all parties and/or counsel of record on this 30th day of May, 2024.

/s/ Travis J. Pringle