BEFORE THE PUBLIC SERVICE COMMISSION OF THE STATE OF MISSOURI

In the Matter of Ameren Missouri's 2023)	
Utility Resource Filing pursuant to 20 CSR)	File No. EO-2024-0020
4240 – Chapter 22)	

JOINT FILING

COMES NOW Union Electric Company d/b/a Ameren Missouri ("Ameren Missouri"), the Staff of the Missouri Public Service Commission ("Staff"), Natural Resources Defense Council ("NRDC"), Grain Belt Express, LLC ("Grain Belt"), Sierra Club, Homes for All St. Louis ("Homes for All"), Council for New Energy Economics ("NEE"), Renew Missouri Advocates ("Renew Missouri"), and the Missouri and St. Louis National Association for the Advancement of Colored People (collectively, "NAACP")¹, and state as follows:

- 1. On September 26, 2023, Ameren Missouri submitted its 2023 triennial integrated resource planning ("IRP") compliance filing.
- 2. On February 27 and 28, 2024, Staff filed a report, and NRDC, Grain Belt, Sierra Club, Homes for All, NEE, Renew Missouri, and NAACP filed comments that allege deficiencies and raise concerns with Ameren Missouri's IRP. There are other parties to this case that did not file comments or a report alleging deficiencies in, or concerns with, Ameren Missouri's IRP.²
 - 3. Rule 20 CSR 4240-22.080(9) provides:

If the staff, public counsel, or any intervenor finds deficiencies in or concerns with a triennial compliance filing, it shall work with the electric utility and the other parties to reach, within sixty (60) days of the date that the report or comments were submitted, a joint agreement on a plan to remedy the identified deficiencies and concerns. If full agreement cannot be reached, this should be reported to the commission through a joint filing as soon as possible but no later than sixty (60) days after the date on which the report or comments were submitted. The joint filing should set out in a brief narrative description those areas on which agreement

¹ The signatories are the only parties that filed deficiencies or concerns in this case.

² The Office of Public Counsel is included among these other parties that did not submit comments.

cannot be reached. The resolution of any deficiencies and concerns shall also be noted in the joint filing.

4. Ameren Missouri and the signatories to this pleading have reached a joint agreement on a plan to remedy some of the alleged deficiencies and concerns, as set forth in Attachment A to this pleading, which is incorporated as if fully set forth herein. Also set forth in the Attachment A is a listing and brief descriptions of those matters that remain unresolved. These unresolved matters will be addressed in more detail in Ameren Missouri's *Response* to the filed comments submitted contemporaneously with this filing.

WHEREFORE, the undersigned parties to this Joint Filing request the Commission accept this pleading as fulfilling the requirements of 20 CSR 4240-22.080(9).

Respectfully submitted,

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CERTIFICATE OF SERVICE

The undersigned hereby certifies that a true and correct copy of the foregoing was served upon the parties listed on the official service list by e-mail on this 11th day of June, 2024.

<u>/s/ William D. Holthaus, Jr.</u>
William D. Holthaus, Jr.