

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

In the Matter of Union Electric Company d/b/a Ameren)
Missouri's Request for a Variance Regarding its) File No.: EE-2024-0376
Renewable Energy Standard Compliance.)

REQUEST FOR VARIANCE

COMES NOW, Union Electric Company, d/b/a Ameren Missouri ("Ameren Missouri" or the "Company"), and for its request under 20 CSR 4240-20.100(11) for a variance from a portion of the Missouri Public Service Commission's ("Commission") Renewable Energy Standard ("RES") rules, specifically a portion codified at 20 CSR 4240-20.100(3)(J), states as follows:

**REQUEST FOR VARIANCE FROM 10% LIMITATION ON
2025 REC RETIREMENTS FOR COMPLIANCE YEAR 2024**

1. The Commission's regulations, at 20 CSR 4240-20.100(3)(J), require Ameren Missouri to retire 90% of the Renewable Energy Credits ("RECs") needed to comply with the RES requirements during the compliance year (here, 2024), and retire no more than 10% of the required RECs in the year following the compliance year (2025).

2. In the early years of compliance with the RES, this 90% requirement did not cause a problem as Ameren Missouri had a bank of excess RECs at its disposal. However, as the RES requirements have increased, Ameren Missouri's REC bank has been depleted to the point that it now relies on RECs generated during the compliance year to meet the RES requirements.¹ Relying on generation that occurs during the compliance year is allowed by the MPSC regulations, however, there are practical impediments that come with this strategy.

3. The impediment is the amount of time it takes for a newly created REC to be verified and show up in the North America Renewable Registry ("NARR") system for use (retirement) by

¹ The Company expects its bank will grow, as more renewable generation is added to its generation portfolio, but it is not yet reached the point where it has excess RECs.

the Company. RECs are not immediately available for use at the moment of generation. In fact, RECs are not transferred to the Company account in NARR until the month following receipt of a generation report from MISO, called the MISO S55 report. As an example of this delay, the Company will likely need the RECs generated in October, November and December of 2024 in order to comply with the RES requirements for 2024. However, it will be unable to retire the RECs generated in those three months until the RECs have been verified and transferred into Company inventory, which likely does not occur until January, February and March of 2025, respectively. Using these RECs would require Ameren Missouri to retire more than 10% of the RECs needed for 2024 compliance in calendar year 2025.

4. The Company's variance request stems from the delay between when RECs are generated and when they become available in the NARRs system for retirement, a process over which Ameren Missouri has no control. As an alternative to this request, Ameren Missouri could build up its REC bank by purchasing RECs that it could retire during the current compliance year. The Company expects it could purchase approximately ** _____ ** RECs for about ** ____ ** per REC, for a total of approximately \$2.5 million. Taking this approach, in Ameren Missouri's opinion, would result in an unnecessary additional \$2.5 million dollars to be incurred for 2024 RES compliance. That said, if the Commission prefers that the Company comply by purchasing additional RECs rather than by requesting this variance, Ameren Missouri can certainly purchase these additional RECs.

5. Ameren Missouri submits that the 10% limitation forces the Company (and ultimately, its customers) to incur RES compliance costs for 2024 that it should be able to avoid.² Ameren Missouri requests the Commission find there is good cause to grant the Company a variance

² There is some risk that, even with this variance, Ameren Missouri may need to purchase some RECs in addition to using generation from October, November and December of 2024. This need will depend on the quantity of generation the Company produces.

from the limitation that no more than 10% of the required RECs for compliance year 2024 shall be retired between Jan. 1, 2025 and April 15, 2025.

WHEREFORE, Ameren Missouri requests the Missouri Public Service Commission grant it a variance from the provisions of 20 CSR 4240-20.100(3)(J) for the 2024 compliance year for good cause shown, as set forth above.

Respectfully submitted,

/s/ William D. Holthaus, Jr.

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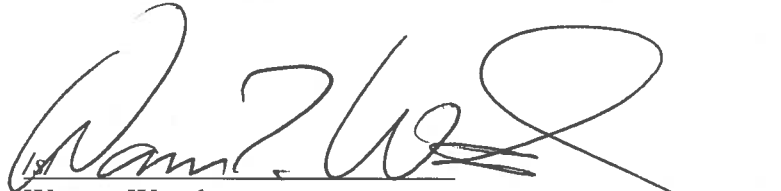
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d/b/a Ameren Missouri

VERIFIED DECLARATION

Under penalty of perjury, I declare that the foregoing declaration is true and correct to the best of my knowledge and belief.

A handwritten signature in black ink, appearing to read "Warren Wood", written over a horizontal line. The signature is stylized and cursive.

Warren Wood
Vice-President Regulatory and
Legislative Affairs

CERTIFICATE OF SERVICE

The undersigned hereby certifies that a true and correct copy of the foregoing Request for Variance was served on the following parties via electronic mail (e-mail) on this 26th day of August, 2024.

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/s/ William D. Holthaus, Jr. _____
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