

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

In the Matter of the Application of Union Electric) **File No. EA-2023-0286**
Company d/b/a Ameren Missouri¹ for Certificates of) Tracking No. JE-2025-0020
Convenience and Necessity for Solar Facilities)

STAFF’S TARIFF RECOMMENDATION

COMES NOW the Staff of the Missouri Public Service Commission (“Staff”), through counsel, and provides the Commission with its recommendation on Ameren Missouri’s tariff number JE-2025-0020.

1. On August 30, 2024,² Ameren Missouri filed an original tariff sheet to publish the rates associated with auction results for the Cass County Project related to the Renewable Solutions Program. The following procedural history preceded this filing. On March 21, the Commission had issued its Order Approving Stipulation and Agreement and Granting Certificates of Convenience and Necessity (“CCN”) (Stipulation). The stipulation contained the following condition precedent for the issuance of a CCN for the Cass County Project:

6. The Signatories agree that a CCN for the Cass County Project should not be granted unless and until the following condition precedent is satisfied: An auction process seeking subscriptions to the Cass County Project as a Renewable Solutions Program resource and offering subscriptions to the Cass County Project at a first year Renewable Resource Rate of \$9.50 per kilowatt (“kW”) and at a first year Renewable Benefits Rate of \$0.04 per kilowatt-hour (“kWh”) shall be completed, resulting in Renewable Solutions Program subscriptions for the entire capacity of the Cass County Project at a Renewable Resource Rate of no less than that stated above and at a Renewable Benefits Rate of no more than that stated above. The workpaper attached hereto as Exhibit B shall be used to determine Renewable Resource Rates and Renewable Benefit Credits after the first year by

¹ Hereinafter, “Ameren Missouri.”

² All date references will be to 2024 unless otherwise indicated.

increasing the first year Renewable Resource Rate and/or decreasing the first year Renewable Benefits rate in accordance with the auction results.

7. Should the condition precedent in paragraph 6 be satisfied, the Signatories agree that the Commission should at that time grant Ameren Missouri a certificate of convenience and necessity under subsection 1 of Section 393.170 authorizing Ameren Missouri to construct, install, own, operate, maintain, and otherwise control and manage the Cass County Project, including authorizing Ameren Missouri to engage in the transactions by which it will construct and finance the Cass County Project pursuant to the Purchase and Sale Agreement (“PSA”)7 with Savion, LLC. The Signatories further agree that such a CCN for the Cass County Project should be made subject to the conditions provided for in paragraph 5 of this Agreement.

2. Subsequently, on May 16, Ameren Missouri Filed a Notice that the condition precedent to Issuance of CCN for the Cass County Project had been satisfied and requested the CCN. After subsequent communications between Staff and Ameren Missouri and on Staff’s suggestion, Ameren Missouri then filed a Notice of Additional Submission of Additional Information Requested by the Commission’s Staff on May 21. This submission contained, as Schedule 1, an updated Exhibit B to the Stipulation and Agreement, reflecting “the Renewable Resource Rates and Renewable Benefits Rates for all 15 years of the subscriptions, using the higher auction-cleared first year Renewable Resource Rate and the unchanged first year Renewable Benefits Rate to derive the year two through 15 rates.” Staff reviewed the Ameren Missouri filings of May 17 and May 21 and concluded that Ameren Missouri had satisfied the condition precedent to the issuance of a CCN set out in Paragraph 6 of the Stipulation and Agreement. Staff so advised the Commission in its recommendation filed on May 23. On June 12, the Commission granted Ameren Missouri a certificate of convenience and necessity to construct, install, own, operate, maintain, and otherwise control and manage the Cass County Project, as per the Stipulation and Agreement filed with the issued Order of March 21.

3. The tariff sets out a Renewable Solutions Rate schedule – Program Phase No. 2. The tariff states that the rate schedule set out therein applies to RE Service for subscribers enrolled in Program Phase No. 2. It states that subsequent program phases, if any, shall have a separate rate schedule. Ameren Missouri submitted the tariff with a filing letter. It stated that the “purpose of the new tariff Sheet No. 83.7 is to publish the prices associated with auction results for the Cass solar facility per the terms of the Commission’s Order in the CCN case File No. EA-2023-0286.”

4. Staff has reviewed the Commission’s filings and orders. Staff has reviewed the tariff. Based upon a review of the tariff and the Commission’s orders, Staff concludes that the tariff complies with the previous orders of the Commission and recommends that the Commission approve the tariff, to become effective on September 29, 2024. The tariff, assigned Tracking No. JE-2025-0020, is:

MO.P.S.C. SCHEDULE NO. 6

Original SHEET NO. 83.7

WHEREFORE, Staff prays that the Commission will accept this pleading as compliant with the Commission’s orders.

Respectively Submitted,

/s/ Paul T. Graham

Paul T. Graham #30416

Senior Staff Counsel

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Attorneys for the Staff of the
Missouri Public Service Commission

CERTIFICATE OF SERVICE

I hereby certify that copies of the foregoing have been mailed, hand-delivered, or transmitted by facsimile or electronic mail to counsel of record as reflected on the certified service list maintained by the Commission in its Electronic Filing Information System this 9th day of September, 2024.

/s/ Paul T. Graham

BEFORE THE PUBLIC SERVICE COMMISSION

OF THE STATE OF MISSOURI

In the Matter of the Application of Union Electric)
Company d/b/a Ameren Missouri for Permission)
and Approval and Certificates of Public)
Convenience and Necessity Authorizing it to)
Construct Renewable Generation Facilities)

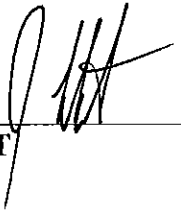
File No. EA-2023-0286
Tracking No. JE-2025-0020

AFFIDAVIT OF J LUEBBERT

STATE OF MISSOURI)
)
COUNTY OF COLE) ss.

COMES NOW J LUEBBERT, and on his oath declares that he is of sound mind and lawful age; that he contributed to the foregoing *Staff Recommendation*; and that the same is true and correct according to his best knowledge and belief.

Further the Affiant sayeth not.

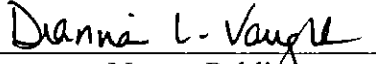


J LUEBBERT

JURAT

Subscribed and sworn before me, a duly constituted and authorized Notary Public, in and for the County of Cole, State of Missouri, at my office in Jefferson City, on this 9th day of September 2024.

DIANNA L. VAUGHT
Notary Public - Notary Seal
State of Missouri
Commissioned for Cole County
My Commission Expires: July 18, 2027
Commission Number: 15207377



Notary Public