

BEFORE THE PUBLIC SERVICE COMMISSION
OF THE STATE OF MISSOURI

| | | |
|--|---|-----------------------|
| In the Matter of a Determination of Special |) | |
| Contemporary Resource Planning Issues to |) | |
| be Addressed by Union Electric Company |) | File No. EO-2025-0077 |
| d/b/a/ Ameren Missouri in its Next Triennial |) | |
| Compliance Filing or Next Annual Update |) | |
| Report |) | |

SIERRA CLUB’S LIST OF SUGGESTED SPECIAL CONTEMPORARY ISSUES

Pursuant to 20 CSR 4240-22.080(4), Sierra Club hereby recommends the following as special contemporary issues for consideration, analysis, and documentation by Ameren Missouri (“Ameren” or the “Company”) in its next IRP filing:

1. Regulatory Risk Assessment and Going-Forward Value of the Labadie and Sioux coal units. As explained in recent Ameren IRP comments, the Company has neglected to seriously assess the significant and numerous regulations that affect Labadie’s future operations.¹ Accordingly, Ameren should analyze and document the net present value of continuing to operate each of the Company’s coal-burning units, including consideration of known and potential compliance costs. This issue is especially significant for the Labadie coal units, which are currently slated to operate till the 2040s, but where those coal units face risks from proposed and final regulations, such as the Good Neighbor Plan, GHG performance standards (111(d)), Regional Haze regulation, ozone nonattainment, and updated proposed Mercury Air Toxics Standards. Ameren should be ordered to study whether retaining each unit in operation benefits customers in

¹ Sierra Club’s Comments on Ameren Missouri’s 2023 Integrated Resource Plan, Docket No. EO-2024-0020 (Feb. 28, 2024), available at: <https://efis.psc.mo.gov/Case/FilingDisplay/584304>.

comparison with an alternative suite of resources, including consideration of compliance with all of these environmental regulations.

2. Capacity Expansion Modeling. Ameren should generate, analyze, and evaluate plans using a capacity expansion model that prioritizes economic optimization for the purpose of selecting a lowest-cost resource plan. As Sierra Club explained in prior IRP comments,² Ameren models pre-selected portfolios where unit retirements and generation additions are fixed by the Company. Ameren’s modeling is limited because it fails to allow for retirements or generation additions based on economics. Ameren’s methodology is problematic because it leaves potentially lower-cost portfolios unexplored—unless by utter and unlikely coincidence Ameren happened to have pre-selected the lowest-cost portfolio. Instead, Ameren should conduct capacity expansion modeling—the type of modeling that Evergy has agreed to perform in its IRPs—that allows for economic retirement and replacement of resources due to the key factors it has identified; this would produce an objective, optimized portfolio comprised of resources that have been economically justified.
3. Grid-Enhancing Technologies. The nation is facing an aging grid that will require both the expansion and refurbishment of existing infrastructure. Grid-enhancing technologies (GETs) can help maximize existing infrastructure to reduce congestion in a rapid and cost-effective for ratepayers considering the alternatives. Ameren should thus study the use of GETs holistically on its system, including the use of dynamic line and transformer ratings, power flow controllers, reconductoring, topology optimization, and other technologies.

² *Id.*

Respectfully submitted,

/s/ Sarah Rubenstein

Sarah Rubenstein

Great Rivers Environmental Law Center

319 N. Fourth St., Ste. 800

srubenstein@greatriverslaw.org

Attorney for Sierra Club

CERTIFICATE OF SERVICE

I hereby certify that a true and correct PDF version of the foregoing was filed on EFIS and sent by email on this 15th day of September, 2024, to all counsel of record.

/s/ Sarah Rubenstein
Sarah Rubenstein