

BEFORE THE PUBLIC SERVICE COMMISSION
OF THE STATE OF MISSOURI

In the Matter of Ameren Missouri)	
2017 Integrated Resource Plan)	File No. EO-2019-0314
Annual Update Report)	

NRDC’s Comments on Annual Update Report and Summary Report

Pursuant to 4 CSR 240-22.080(3)(D), the Natural Resources Defense Council takes the opportunity to comment on Ameren’s annual update report and Post-Workshop Summary Report.

The purpose of the annual report and workshop procedure is to ensure the stakeholders “the opportunity to provide input and to stay informed regarding,” among other things, the status of critical uncertain factors, special contemporary issues, resolution of deficiencies from the 2017 triennial plan, and changing conditions generally. 4 CSR 240-22.080(3)(A).

Securitization. In its order establishing Special Contemporary Issues (SCIs) in Case EO-2019-0065, the Commission said, “Ameren Missouri shall analyze and document the following special contemporary issues in its 2019 IRP Annual Update Report.” The Commission also gave Ameren the leeway to explain, in the alternative, where the Commission might find the company’s treatment of these issues in a past or future filing, but for the most part Ameren has not even done that.

The SCI order, ¶ 1.F, directs Ameren to analyze and document the prospects for using securitization to advance coal retirements and channel the savings into other investments including wind and solar generation and demand-side resources. The Update (pp. 15–7)¹ indicates that Ameren does not intend to do this, primarily for reasons of legislative uncertainty

¹ See also Post-Workshop Summary, p. 3.

and because it has already decided to use traditional financing for any further renewable generation. A securitization bill has been introduced in each of the last two sessions of the Missouri legislature but has not passed yet. Ameren has had more than enough opportunity to evaluate the concept but, while acknowledging that securitization is a “potential tool” that “could provide another viable option and additional planning flexibility,” has chosen not to engage on how the legislation could be improved from the company’s point of view or how it could be used to achieve its stated goals of emission reductions.

Ameren can still, and we hope that it will, in its 2020 IRP fully evaluate and model the costs of new supply side and demand side resources, which could be financed from the savings realized by securitization.

Distributed energy resources. Ameren explained at the workshop that it mistakenly failed to fulfill its commitment to NRDC in the Joint Filing on the last triennial plan² because the company believed this DER study was to be done in the 2020 triennial filing, not the annual update.³

The DER study could be a valuable means of modeling Ameren’s five-year capital investment plan under SB 564, which includes substantial investments in the distribution system. Distribution planning could be the vehicle for justifying the capital investment plan; otherwise it is likely to come up first in a rate case, which is a poor forum for formulating policy and introducing the rationale behind a plan that is already being executed.

² EO-2018-0038, Joint Filing, p. 8, No. 30, NRDC Concern 1, “Resolved.”

³ Post-Workshop Summary, p. 2.

Respectfully submitted,

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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 7th day of June, 2019, to all counsel of record.

/s/ Henry Robertson

Henry Robertson