

**STATE OF MISSOURI
PUBLIC SERVICE COMMISSION**

At a session of the Public Service Commission held at its office in Jefferson City on the 21st day of November, 2024.

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

ORDER GRANTING VARIANCE

Issue Date: November 21, 2024

Effective Date: December 1, 2024

On August 26, 2024, Union Electric Company d/b/a Ameren Missouri filed an application for a variance regarding the Commission's Renewable Energy Standard (RES) rules. Ameren Missouri requests a variance from 20 CSR 4240-20.100(3)(J).

That rule requires utilities to retire Renewable Energy Credits (RECs) within the compliance calendar year, or by April 15 of the following calendar year, as long as the retirements through April 15 in the following calendar year do not exceed 10% of the RECs necessary to be retired for the compliance year.

In support of its request, Ameren Missouri states that its REC bank has been depleted and it now relies on RECs generated during the compliance year to meet RES requirements. Ameren Missouri will need to retire RECs generated during the 2024 compliance year to meet the RES requirements. Due to the 60-90-day lag between the date the REC is generated and the date it is available to be retired, Ameren Missouri will be unable to retire RECs generated in October, November and December of 2024 until those RECs have been verified and transferred to the Company's inventory. That transfer likely will not occur until the first quarter of 2025. As the RECs generated in October,

November and December 2024 would be more than 10% of the RECs needed to be retired for the 2024 compliance year, Ameren Missouri is requesting a variance of that 10% limitation for compliance year 2024. Ameren Missouri submits that rule requires the Company to make 90% of the required REC retirements during the 2024 compliance year in order to comply with the RES requirement and therefore would force the Company and its customers to incur RES compliance costs for 2024 that it should be able to avoid.

The Staff of the Commission (Staff) filed its Recommendation on November 7, 2024. Staff agrees that purchasing RECs for the 2024 compliance year is avoidable and recommends that the Commission grant Ameren Missouri the requested variance for the 2024 compliance year. No other party responded to the application or to the Staff Recommendation.

Under 20 CSR 4240-20.100(11), the Commission may grant a variance for good cause shown. The Commission finds that Ameren Missouri has presented good cause for the variance and will grant the requested relief. So the Company can timely comply with the regulations, the Commission finds it reasonable to make this order effective in less than 30 days.

THE COMMISSION ORDERS THAT:

1. Union Electric Company d/b/a Ameren Missouri's request for a variance from Commission Rule 20 CSR 4240-20.100(3)(J) for the 2024 compliance year is granted.

2. This order shall become effective on December 1, 2024.
3. This file shall be closed on December 2, 2024.



BY THE COMMISSION

Nancy Dippell

Nancy Dippell
Secretary

Hahn, Ch., Coleman, Holsman
Kolkmeier, and Mitchell CC., concur.

Fewell, Regulatory Law Judge

STATE OF MISSOURI

OFFICE OF THE PUBLIC SERVICE COMMISSION

I have compared the preceding copy with the original on file in this office and I do hereby certify the same to be a true copy therefrom and the whole thereof.

WITNESS my hand and seal of the Public Service Commission, at Jefferson City, Missouri, this 21st day of November 2024.



Nancy Dippell

Nancy Dippell
Secretary

MISSOURI PUBLIC SERVICE COMMISSION

November 21, 2024

File/Case No. EE-2024-0376

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Enclosed find a certified copy of an Order or Notice issued in the above-referenced matter(s).

Sincerely,



**Nancy Dippell
Secretary**

Recipients listed above with a valid e-mail address will receive electronic service. Recipients without a valid e-mail address will receive paper service.