

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

In the Matter of Union Electric Company)	
d/b/a Ameren Missouri's Tariffs to Decrease)	<u>File No. ER-2019-0335</u>
Its Revenues for Electric Service)	Tracking No. JE-2025-0061

STAFF RECOMMENDATION TO SUSPEND TARIFF SHEET

COMES NOW Staff of the Missouri Public Service Commission and for its Staff Recommendation respectfully states as follows:

1. On November 1, 2024, Union Electric Company d/b/a Ameren Missouri ("Ameren Missouri") filed a letter and one (1) revised tariff sheet to extend its Voluntary Green/Pure Power pilot program through June 30, 2026. The submitted tariff bore a requested effective date of December 1, 2024, and was filed under Tariff Tracking No. JE-2025-0061.

2. On November 25, 2024, the Commission issued an *Order Directing Staff Recommendation* ("Order") which ordered, among other things, that Staff file a recommendation regarding the proposed tariff revision (Tracking No. JE-2025-0061) no later than November 27, 2024, at 11:00 a.m.

3. As reflected in the attached Staff Recommendation Memorandum which is incorporated herein by this reference, Staff has reviewed the revised tariff sheet as submitted on November 1, 2024, and for the reasons set forth in the attached Staff Recommendation Memorandum recommends the Commission issue an order **suspending** the following tariff sheet an additional thirty (30) days beyond the requested effective date of December 1, 2024:

MO.P.S.C. SCHEDULE NO. 6
10th Revised Sheet No. 163.1, cancelling 9th Revised Sheet No. 163.1

WHEREFORE, Staff submits its Staff Recommendation as set forth hereinabove and in the Staff Recommendation Memorandum which is attached hereto and prays the Commission issue an order accordingly.

Respectfully submitted,

/s/ Jeffrey A. Keevil

Jeffrey A. Keevil

Deputy Counsel

Missouri Bar No. 33825

P. O. Box 360

Jefferson City, MO 65102

(573) 526-4887 (Telephone)

(573) 751-9285 (Fax)

Email: jeff.keevil@psc.mo.gov

Attorney 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 27th day of November 2024.

/s/ Jeffrey A. Keevil

MEMORANDUM

TO: Missouri Public Service Commission Official Case File
Case No. ER-2019-0335 and Tariff Tracking No. JE-2025-0061

FROM: Randall Jennings, Research/Data Analyst
Tariff/Rate Design Department

SUBJECT: Staff Recommendation to Suspend Union Electric Company, d/b/a/
Ameren Missouri Proposed Tariff Sheet to extend the Voluntary
Green/Pure Power pilot program effective December 1, 2024

DATE: November 27, 2024

BACKGROUND

On November 1, 2024, Union Electric Company, d/b/a/ Ameren Missouri (“Ameren Missouri”), filed with the Commission a letter and one (1) revised tariff sheet¹ bearing an issue date of November 1, 2024 and a requested effective date of December 1, 2024, proposing to extend the Voluntary Green/Pure Power pilot program through June 30, 2026. Pilot Program customers that choose to transition will be given priority for Rider CSP enrollment or on any waitlist and will be considered to have been enrolled in Rider CSP from the date of their Pilot Program enrollment.

Ameren Missouri stated that the timing of the revision listed above is consistent with the Stipulation and Agreement approved in its 2019 rate case, ER-2019-0335, which contemplates Pure Power continuing to be available until customers have been given an opportunity to convert to service under the Company’s Solar rider. Ameren Missouri stated the New Florence solar facility, for which the Commission recently granted a CCN in EA-2024-0212 (effective November 1, 2024), will support Community Solar and is expected to be placed into service sometime during the first half of 2026.

The Commission issued its Order Directing Staff Recommendation on November 25, 2024, which directed Staff to file its recommendation no later than November 27, 2024, by 11:00 a.m.

STAFF RECOMMENDATION

Staff has reviewed the proposed revised tariff sheet as submitted on November 1, 2024 and recommends the Commission issue an order suspending the following tariff sheet from the requested effective date of December 1, 2024 for an additional thirty (30) days to allow Staff

¹ MO.P.S.C. Schedule No. 6, 10th Revised Sheet No. 163.1, cancelling 9th Revised Sheet No. 163.1.

to collect additional information and provide the Commission a more complete overview of the program involved.

MO.P.S.C. Schedule No. 6

10th Revised Sheet No. 163.1, canceling 9th Revised Sheet No. 163.1

On November 4, 2024 Staff requested information from Ameren Missouri regarding customers currently enrolled in the Voluntary Green/Pure Power pilot program. On November 7, 2024 Ameren Missouri replied stating they were setting a target date of November 15, 2024 to respond. After not receiving any of the requested information by November 15, on November 21, 2024 Staff submitted a request for a status update on Staff's original data inquiry and also requested additional new information. On that same date, Ameren Missouri provided some of the originally requested information but advised they are concerned whether the additional information can be gathered before Thanksgiving and as of this date, has been unable to expound upon the previously supplied information.

Due to the lack of clarity of the information received and the outstanding requests for additional information, Staff requests the revised tariff sheet submitted on November 1, 2024 be suspended an additional thirty (30) days. If the revised tariff sheet is eventually approved upon the completion of Staff's requested thirty days, depending upon the promptness and completeness of Ameren Missouri's responses to Staff's data inquiries, the tariff sheet could still be allowed to go into effect prior to the Voluntary Green/Pure Power pilot program ending date of December 31, 2024 listed in the currently active tariff sheet.²

² MO.P.S.C. Schedule No. 6, 9th Revised Sheet No. 163.1, cancelling 8th Revised Sheet No. 163.1.

