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BEFORE THE PUBLIC SERVICE COMMISSION

STATE OF MISSOURI

TRANSCRIPT OF PROCEEDINGS

DISCOVERY CONFERENCE

In the Matter of)
Ameren Missouri's 2024)
Integrated Resource Plan) File No. EO-2025-0123
Annual Update)

TUESDAY, NOVEMBER 26, 2024

3:00 p.m.

Jefferson City, MO 65101

via WebEx

VOLUME 1

RON PRIDGIN, Presiding
REGULATORY LAW JUDGE

Reported by: Melissa Eicken

1 LAW JUDGE PRIDGIN: -- anyone else who
2 needs to be on this conference before we begin?

3 MS. RUBENSTEIN: Not for Sierra Club.
4 We're all here, just me.

5 LAW JUDGE PRIDGIN: All right. Thank you.

6 MS. KERR: I'm here for Staff.

7 MR. HOLTHAUS: Apologies. I was a few
8 minutes late. I had some difficulty connecting, but
9 it's all good now. Nobody else from Ameren will be
10 joining.

11 LAW JUDGE PRIDGIN: All right. Thank you.
12 And no worries. Thank you very much.

13 If -- if everyone's ready to begin, I will
14 try to keep this short and sweet and informal. I
15 understand Sierra Club has some discovery concerns and
16 wanted to have a conference to -- to try to kind of
17 air out those concerns and also to check the box and
18 file a -- a discovery motion later, if needed.

19 And, so my plan -- I mean, I won't be
20 ruling on anything today. My plan is to simply let
21 Sierra Club make whatever kind of statement it wants,
22 and then the same for Ameren Missouri and the same for
23 Staff, and I don't think anyone else is present for
24 the conference, so. Unless anyone prefers going
25 another route, I would simply like to hear from

1 Ms. Rubenstein, Mr. Holthaus and then Ms. Kerr. So
2 anything from any of the parties before we get
3 started?

4 Okay. Hearing nothing, Ms. Rubenstein,
5 when you're ready.

6 MS. RUBENSTEIN: Great. Thank you so much.

7 So in this annual IRP annual update matter,
8 Sierra Club served Ameren with a set of data requests.
9 Ameren has refused to respond to the request
10 asserting, generally, that there's no discovery
11 allowed in an annual update proceeding. We
12 respectfully disagree and would like to seek the
13 Commission's assistance in clarifying this issue, and
14 I'll just mention that we did check the box of --
15 we've exchanged correspondence, but then we also spoke
16 over the phone, and it -- it looks like we just had to
17 reach a point of agreeing to disagree. There are also
18 some specific objections that were asserted to the
19 data request after our -- our conference. I think we
20 resolved all of them with one exception, and that's
21 Data Request 1.6. That's the request that seeks
22 information about the company's compliance with new
23 and updated EPA regulations.

24 I'll address first the general objection,
25 and then, I guess, I can speak to the specific

1 objection after I do that. So Sierra Club believes
2 that the General Public Service Commission Rule
3 regarding discovery which is 20 CSR 4240-2.091 should
4 apply here. And that obligates Ameren to respond to
5 the data request. 2.091 provides the discovery may be
6 obtained from the same means and under the same
7 conditions as in civil actions in circuit court.
8 Because Sierra Club is an intervenor, and therefore,
9 stakeholder in this proceedings, we believe it's
10 entitled to discovery. We also suggest that a 2014
11 order from the Empire District Electric Company's IRP
12 proceeding is directly on point and supports our
13 position. In that order, the Commission overruled
14 objections that Empire made to data requests that were
15 served on it by an intervenor. The Commission
16 expressly found that even though an IRP proceeding is
17 a non-contested case, because there's no legal
18 requirement to holding a hearing in an IRP proceeding,
19 because the Commission rules expressly designate that
20 an intervenor is considered a party, the intervenor is
21 entitled to issue data requests and receive responses
22 thereto. I would suggest that in this proceeding,
23 similarly, no one disputes that Sierra Club is a
24 stakeholder to the annual update proceeding or an
25 intervenor, and therefore, we believe we're a party

1 under 2202 -- that's 56, I believe, of the IRP Rules.
2 So we suggest that even though no hearing is required
3 in an annual update proceeding, under the IRP rules,
4 we should be considered parties, and therefore, allow
5 to serve discovery even in an annual update
6 proceeding. And we think Ameren owes us responses to
7 our data requests.

8 I would also point the Commission to sort
9 of the purpose of the annual update proceedings and --
10 and that would be in 22.080 -- I believe it's 3-A.
11 That's the -- the provision in the regs about the
12 annual update proceedings and that regulation
13 specifies that the purpose of the proceeding is to
14 ensure that members of the stakeholder group have the
15 opportunity to provide input and stay informed. These
16 data requests are narrowly tailored to that purpose.

17 Finally, I'll point out that in similar
18 annual update proceedings involving Evergy, multiple
19 parties have served to -- data requests on Evergy and
20 Evergy's responded. There's never -- an objection has
21 not been raised by that company.

22 Okay. And then as to the specific
23 objections to Item 1.6, that -- that request in
24 response to that request, Ameren asserts that it
25 refers back to the joint filing that was just

1 submitted in the IRP proceeding and is -- is
2 essentially asserting that our requests for the
3 information in that DR 1.6 is premature.

4 In the joint filing, Ameren asserts that
5 it -- it doesn't need to provide information about
6 EPA's new regulations until it updates or changes its
7 preferred resource plan, and I would suggest that
8 that's simply not what the parties agreed, and we
9 would point to the joint filing -- Exhibit A to the
10 joint filing. There are a couple of places where the
11 language is -- is kind of key to this question. On
12 page 6 of Exhibit A, Ameren agreed to include
13 compliance with new EPA regulations and any update to
14 its preferred resource plan, and Sierra Club would
15 assert that this annual update is that update, and
16 therefore, we're entitled to the information, and then
17 on page 5 of Exhibit A, in resolution of a different
18 stakeholder's deficiencies, Ameren agreed to include
19 analysis of its compliance with new and updated EPA
20 regulations and its next preferred resource plan
21 filing whether that occurs by an annual update or
22 change in preferred resource plan.

23 So, again, we think it's pretty clear.
24 Their specific objections to 1.6 are not valid, and
25 we're entitled to that information now.

1 LAW JUDGE PRIDGIN: Mr. Rubenstein, thank
2 you. Did you have anything else or -- or --

3 MS. RUBENSTEIN: That's all I got on the
4 issue. Thanks.

5 LAW JUDGE PRIDGIN: Thank you so much.
6 Mr. Holthaus, any response?

7 MR. HOLTHAUS: Yes, Judge. Thank you.

8 With regards to Ameren's objections that
9 are directed to all of Sierra Club's data request, the
10 Commission Rules regarding annual IRP updates
11 contemplate only a short update process, lasting about
12 two and a half months which is much shorter than the
13 procedure for triannual compliance filing matters.
14 Ameren Missouri simply files an annual IRP update, and
15 shortly thereafter, Ameren hosts a workshop during
16 which Ameren takes questions from the stakeholders,
17 and Ameren also solicits written question or Ameren
18 requests written questions in advance of the workshop
19 so that we can address them during the -- the workshop
20 itself, and then 10 days after the workshop, Ameren
21 submits to the Commission a very brief summary report,
22 and the stakeholders have 30 days after that summary
23 report to file comments, and then that's the end.
24 Unlike triannual compliance filings, there's not even
25 an opportunity for a hearing at which to admit

1 evidence, and if comprehensive data requests similar
2 to those propounded in the triannual compliance
3 filings were permitted in annual IRP update cases, it
4 will be a challenge to complete the annual update
5 process in the time provided by Commission Rule 20 CSR
6 4240-20.080. Again, about two and a half months which
7 compares to something like six to 10 months for
8 triannual compliance filings, and further, the data
9 requests propounded by Sierra Club in this instance
10 seek much of the same information that Sierra Club
11 sought in the 2023 triannual IRP compliance filing
12 including emissions data generation and capacity
13 statistics, O&M costs, just to name a few for Ameren
14 Missouri's entire generation fleet. That's DR's 1.2
15 and 1.3. The MISO capacity price forecast used in
16 Ameren Missouri's modelling, that's DR 1.4, costs
17 forecasts for constructing new generation projects of
18 various types, that's D-R1.5, and costs of carbon
19 capture and sequestration, 1.7. I won't list all of
20 them. But Ameren believes it should not have to
21 answer the same DRs every single year and also
22 permitting the same discovery that is permitted in
23 triannual compliance matters would expand these
24 limited annual update reports into something more
25 closely resembling a triannual compliance filing.

1 Ameren already provides opportunity for the
2 stakeholders to obtain information via the workshop,
3 and we invite stakeholders to submit written questions
4 in advance for us to address during the workshop.
5 Ameren's concern that it -- that if DRs were permitted
6 the focus of these annual IRP updates will become less
7 about the workshop itself and more about answering
8 data requests. We -- just in response to Sierra
9 Club's argument regarding the Empire order from 2014
10 that it refers to, that arises in a different context.
11 That case was a triannual IRP compliance filing.
12 Ameren doesn't contend that we don't have to answer
13 DRs in the triannual compliance filing. We actually
14 do answer -- I believe we answered all of them last
15 year in the 2023 IRP case. Our position is that an
16 annual update is different. For one reason, it's much
17 shorter, and two, unlike an IRP, a triannual IRP
18 filing, it's a much -- there's no possibility for a
19 hearing. The Commission doesn't even have an option
20 to give a hearing, so there's no hearing that which
21 evidence can be presented.

22 And the last point I'll make regarding
23 Ameren's position on the objections directed at all
24 data requests is that Sierra Club has alternate
25 avenues to obtain at least some of the discovery that

1 it seeks here. At least two of the DRs at issue here,
2 1.2 and 1.3, are very similar to discovery that Sierra
3 Club has obtained from Ameren in Ameren's pending
4 electric rate case. So that's all I'll say about all
5 the objections that are directed at all DRs.

6 With regard to the additional objection
7 directed at Data Requests 1.6 and that data request
8 relates to how Ameren will comply with the EPA's new
9 carbon capture pollution standards for coal and
10 natural gas generation, what we agreed in our -- our
11 joint filing, I don't think Ms. Rubenstein misstated
12 it was that Ameren would include analysis of its
13 compliance with new and updated EPA regulations in its
14 next preferred resource plan whether that occurs via
15 an annual update or a change in preferred resource
16 plan, and we don't think that means as Sierra Club
17 suggests that we're obligated to address compliance
18 with EPA regulations in either the annual update or a
19 change in PRP, whichever comes first. The obligation,
20 rather, is triggered by the filing of a preferred
21 resource plan which could potentially come in an
22 annual update, but in this case, it did not. Ameren
23 has not made any changes to its preferred resource
24 plan since the 2023 IRP was filed in September of last
25 year. And if Ameren files an update to the PRP or if

1 we update the preferred resource plan in next year's
2 annual update filing, then Ameren will address
3 compliance with EPA regulations at that time.

4 LAW JUDGE PRIDGIN: Mr. Holthaus, thank
5 you.

6 Anything from Staff, Ms. Kerr?

7 MS. KERR: I -- no. We don't have
8 anything. Thank you.

9 LAW JUDGE PRIDGIN: All right. Thank you.

10 I think the parties can certainly consider
11 the box checked. If -- if the parties feel like they
12 need to file any sort of discovery motion, a motion to
13 compel or anything similar, I believe you've satisfied
14 the Commission's rules and -- in giving the conference
15 with the judge. I hope that you'll continue to talk
16 and hopefully work out your dispute, but if not, you
17 are allowed to file a -- any discovery motion that you
18 find -- find appropriate.

19 Is there anything else I can do for the
20 parties before we disconnect?

21 MS. RUBENSTEIN: No. I think that covers
22 it. Thank you so much, Judge.

23 MR. HOLTHAUS: Thank you, Judge.
24 Appreciate it.

25 LAW JUDGE PRIDGIN: All right. Thank you

1 all. I hope everyone has a Happy Thanksgiving and
2 take care. Thank you.

3 MR. HOLTHAUS: Have a great Thanksgiving,
4 everyone.

5 MS. RUBENSTEIN: Thanks. You, too.
6 Bye-bye.

7 (Audio ended.)

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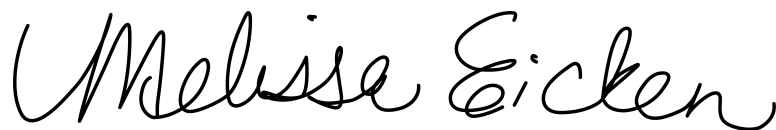
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I, Melissa J. Eicken, Certified Court Reporter of Missouri, Certified Shorthand Reporter of Illinois and Registered Professional Reporter, do hereby certify that I was asked to prepare a transcript of proceedings had in the above-mentioned case, which proceedings were held with no court reporter present utilizing an open microphone system of preserving the record.

I further certify that the foregoing pages constitute a true and accurate reproduction of the proceedings as transcribed by me to the best of my ability and may include inaudible sections or misidentified speakers of said open microphone recording.



Melissa J. Eicken, CCR, CSR, RPR

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