



mechanisms to analyses included in triennial IRP filings. Specifically, the MEEIA rules require that the portfolio of programs for which approval is being requested must show a relationship of the demand-side programs to demand-side resources in the latest IRP compliance filings.<sup>2</sup> Additionally, the MEEIA rules require a comparison of i) the 20-year baseline energy and demand forecasts in the current market potential study with ii) the baseline forecasts in the utility's most recent IRP compliance filing, as well as an analysis of any differences.<sup>3</sup>

5. Ameren Missouri's next DSM potential study will require over a year to complete, and the results that are used in the Company's 2026 IRP filing will not be available until early 2026. Accordingly, early 2026 is the earliest that the Company can initiate its development of alternative resource plans for use in integration and risk analysis. After that analysis is complete, the Company performs a robust process for the selection of the preferred resource plan and acquisition strategy, including communication with the Ameren Board of Directors. Allowing Ameren Missouri until October 1, 2026 will provide sufficient time to conclude this process with the best information possible for its triennial IRP filing.

6. Additionally, Ameren Missouri has filed its previous four triennial compliance filings on or just before October 1 (since October 1, 2014), with the Commission's permission.<sup>4</sup> Ameren Missouri's strategic planning efforts and internal review process are now built around filing the triennial compliance filings and annual updates on or just before October 1st. The Company submits that this change in IRP schedule has not adversely impacted any party's ability to adequately review or comment upon its triennial filing.

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<sup>2</sup> 20 CSR 4240-20.093(9)(B)(11).

<sup>3</sup> 20 CSR 4240-20.094(4)(B)(3).

<sup>4</sup> File No. EO-2015-0084 was filed on October 1, 2014. File No. EO-2018-0038 was filed on September 25, 2017. File No. EO-2021-0021 was filed on September 27, 2020. File No. EO-2024-0020 was filed on September 26, 2023.

7. With the adjustment in the triennial compliance filing date, the Company also requests a commensurate adjustment in the annual update workshops with Staff and other stakeholders for 2027 and 2028 (from April 1<sup>st</sup> to October 1<sup>st</sup> of each year). Changing the annual updates to match the IRP filing date will permit the same cadence of updates (one update every 12 months following the triennial compliance filing) anticipated by the Commission's rules.

### **Request for Waiver of 60 Day Notice**

8. 20 CSR 4240-4.017(1) requires a 60-day notice in advance of filing a case, with a “case” being defined as “[a]ny matter filed before the commission for its determination except working dockets, rulemaking dockets, and investigatory dockets.” 20 CSR 4240-4.015(1).

9. The 60-day notice requirement can be waived for good cause shown and the rule itself establishes that good cause in fact exists if the party seeking the waiver files “a verified declaration . . . that it has had no communication with the office of the commission within the prior one hundred fifty (150) days regarding any substantive issue<sup>5</sup> likely to be in the case . . . .”<sup>6</sup> A verified declaration meeting those requirements is attached to this Request. Accordingly, good cause has been established.

**WHEREFORE**, Ameren Missouri asks the Missouri Public Service Commission to grant it a variance from the filing date requirement of 20 CSR 4240-22.080(1)(C) and allow the Company until October 1, 2026 to make its next triennial compliance filing, with annual updates

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<sup>5</sup> The phrase “substantive issue” is defined by 20 CSR 4240-4.015(14).

<sup>6</sup> 20 CSR 4240-4.017(1)(D).

to be submitted on or before October 1, 2027 and 2028, as well as a waiver of the 60-day notice requirement of 20 CSR 4240-4.017(1), as set forth above.

Respectfully submitted,

/s/ William D. Holthaus, Jr. \_\_\_\_\_

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**VERIFIED DECLARATION**

I hereby declare that neither Ameren Missouri nor any other person on its behalf has had a communication with the office of the Commission regarding any substantive issue likely to be in the case created by this filing within the 150-day period prior to this filing.

Under penalty of perjury, I declare that the foregoing declaration is true and correct to the best of my knowledge and belief.

          /s/ Warren Wood            
Warren Wood  
Vice-President Regulatory and  
Legislative Affairs

**CERTIFICATE OF SERVICE**

I do hereby certify that a true and correct copy of the foregoing document has been transmitted by e-mail this 13th day of January to all parties in the Company's previous Triennial Compliance Filing docket, File No. EO-2024-0020.

/s/ William D. Holthaus, Jr.