

**STATE OF MISSOURI
PUBLIC SERVICE COMMISSION**

At a session of the Public Service Commission held at its office in Jefferson City on the 26th day of March, 2025.

In the Matter of Union Electric Company)
d/b/a Ameren Missouri's Tariffs to Adjust)
its Revenues for Electric Service)

File No. ER-2024-0319

**ORDER ACCEPTING STAFF'S RECOMMENDATION REGARDING
AMEREN MISSOURI'S SECOND RESRAM PRUDENCE REVIEW**

Issue Date: March 26, 2025

Effective Date: April 5, 2025

On August 28, 2024, the Commission's Staff (Staff) filed notice that it was starting its second Renewable Energy Standard Rate Adjustment Mechanism (RESRAM) prudence review of Union Electric Company d/b/a Ameren Missouri for the period January 1, 2023 through December 31, 2024. Staff filed its recommendation and memorandum on March 4, 2025. Staff found no evidence that Ameren Missouri's management of renewable energy standard compliance costs during the most recent review period was imprudent.

Commission Rule 20 CSR 4240-20.100(6)(A)26 requires Staff to file a notice of the commencement of a prudence audit and to file its recommendation no later than 180 days thereafter. Pursuant to the same rule, other parties to the case have 190 days after initiation of the prudence audit to request a hearing. The rule requires the Commission to issue an order no later than 210 days after the staff commences its prudence audit if no party to the prudence audit proceeding requests a hearing within 190 days of the Staff's commencement of the audit. No party has done so. Therefore, the Commission now considers Staff's recommendation and memorandum.

Staff's memorandum explains that the Commission first authorized a RESRAM for Ameren Missouri in File No. EA-2018-0202. The memorandum states that Staff reviewed the following major cost categories included for recovery in Ameren Missouri's RESRAM:

- Solar Rebates – Costs associated with the payment of solar rebates to participating customers.
- Renewable Energy Credits (RECs) – Costs associated with the purchase or retirement of RECs.
- Wind Generation capital investments and associated expenses for the High Prairie Energy Center and the Outlaw/Atchison Renewable Energy Center.
- Biomass Generation fuel expenses at the Maryland Heights Renewable Energy Center.
- Hydro Generation expenses for hydroelectric energy centers.
- North American Renewables Registry (NARR) – Administrative costs associated with registering RECs and S-RECs (RECs from solar sources).
- Carrying Costs – Financing charges applicable to renewable energy standard (RES) compliance costs based on the Company's short-term debt rate.
- MISO and SPP off-system sales – five percent associated with the renewable resources is picked up in the RESRAM until those amounts are included in base rates.

For the review period of January 1, 2023, through December 31, 2024, Staff did not find evidence that Ameren Missouri's management of RES compliance costs was imprudent. Staff did locate a number of Missouri solar system installers that were not registered with the Missouri Secretary of State, or whose business registrations either listed incorrect addresses or were not active during the prudency review period. However, while Staff recommends Ameren Missouri periodically check contractor status with the Missouri Secretary of State, this is not a violation of any statute, Ameren Missouri tariff, or Commission rule.

The Commission finds Staff's recommendation and memorandum regarding its prudence review of Ameren Missouri's RESRAM to be reasonable. No party has requested a hearing or otherwise objected to Staff's recommendation. Therefore, the Commission will accept Staff's recommendation. The Commission finds it reasonable to make this order effective in less than 30 days.

THE COMMISSION ORDERS THAT:

1. Staff's recommendation regarding its prudence audit of the costs subject to Ameren Missouri's RESRAM is accepted.
2. This order shall be effective on April 5, 2025.



BY THE COMMISSION

Nancy Dippell

Nancy Dippell
Secretary

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

Clark, Senior 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 26th day of March 2025.



Nancy Dippell

Nancy Dippell
Secretary

MISSOURI PUBLIC SERVICE COMMISSION

March 26, 2025

File/Case No. ER-2024-0319

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

Sincerely,

A handwritten signature in black ink that reads "Nancy Dippell". The signature is written in a cursive, flowing style.

**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.