

MEMORANDUM

TO: Missouri Public Service Commission
Official Case File, Case No. EO-2025-0281
Union Electric Company d/b/a/ Ameren Missouri's Filing of its Renewable
Energy Standard Compliance Plan for 2025-2027

FROM: Matthew W. Lucas, Engineering Analysis

/s/ Matthew W. Lucas / 05/30/2024
Engineering Analysis / Date

SUBJECT: Staff Report and Conclusion on Union Electric Company's 2025 Annual RES
Compliance Plan

DATE: May 30, 2025

SUMMARY

Staff has reviewed Union Electric Company, d/b/a Ameren Missouri's ("Ameren" or "Company") *2025-2027 RES Compliance Plan* ("Plan"). Based on its review, Staff has not identified any deficiencies the Company's Plan.

OVERVIEW

On April 15, 2025, the Company filed its Plan for calendar years 2025 through 2027, in accordance with Rule 20 CSR 4240-20.100(8), Electric Utility Renewable Energy Standard Requirements, Annual RES Compliance Report and RES Compliance Plan. This rule states, in part, "[e]ach electric utility shall file an annual RES compliance plan with the commission. The plan shall be filed no later than April 15 of each year." Subparagraphs 20 CSR 4240-20.100(8)(B)1. A. through G. provide the minimum requirements for the plan. Subsection 20 CSR 4240-20.100(8)(D) requires that Staff examine the Plan and file a report within forty-five (45) days of the filing of the annual RES compliance report and RES compliance plan.

DISCUSSION

Staff reviewed the Company's Plan in accordance with the established requirements to verify the Plan contains the information required by the Rule. The results of this review are detailed below, with appropriate Rule subparagraphs A. through G. identified and quoted.

A. “A specific description of the electric utility’s planned action to comply with the RES;”

To meet its non-solar RES obligations from 2025 to 2027, the Company will utilize the following current resources:

- Keokuk Hydro-Electric Generating Station
- Maryland Heights Renewable Energy Center
- High Prairie Renewable Energy Center
- Atchison County Renewable Energy Center

These resources are expected to provide ** [REDACTED] ** of RECs annually, but fail to meet the anticipated non-solar RES requirement by roughly ** [REDACTED] **. Ameren will utilize excess solar RECs (“SREC”) and utilize market purchases of RECs to address any deficits that occur. Because the Maryland Heights, High Prairie, and Atchison County facilities are located in Missouri, the Company receives 1.25 RECs for each MWh produced.

To meet its solar SREC requirements, the Company intends to use SRECs sourced from its customer-generators, addition to SRECs generated by its own solar facilities listed below:

- O’Fallon Renewable Energy Center
- BJC Solar Facility
- Ameren Missouri Headquarters Office Building
- South St. Louis Renewable Energy Center
- Cape Girardeau Renewable Energy Center
- House Springs Renewable Energy Center
- Fee Fee Renewable Energy Center
- North Metro Renewable Energy Center
- Delmar Renewable Energy Center
- Huck Finn Solar Facility

The SRECs available from these resources significantly exceeds the solar RES requirement and will help offset the deficit from non-solar resources. These SRECs also qualify for the 1.25 multiplier applied to Missouri-sourced generation.

The Company has Certificates of Convenience and Necessity issued to construct three additional solar facilities over the next few years. It also plans to seek to build an additional 450 MW¹ of solar capacity in the years beyond 2027 to meet anticipated future load growth.

Together, these resources generate less RECs than the Company requires for compliance. In 2025 and 2026, the Company's anticipates deficits of 85,773 MWh and 369,094 MWh, respectively.

B. "A list of executed contracts to purchase RECs (whether or not bundled with energy), including type of renewable energy resource, expected amount of energy to be delivered, and contract duration and terms;"

The Company currently does not have any contracts for REC purchases apart from those for SRECs provided by its customer-generators. The Company provided the following information regarding its executed contracts:

Contracting Party	Type	Expected Energy Delivered (MWh)	Contract Duration
Various Residential & Commercial Customers	Solar	2025: 127,239 2026: 125,867 2027: 125,600	10 years (from awarding of solar rebates date varies between 2014-2023)

¹ The Vandalia Solar Project is 50 MW scheduled for 2025, the Bowling Green Solar Project is 50 MW scheduled for 2026, and the Split Rail Solar Project is 300 MW scheduled for 2027.

Through these contracts, the Company receives the S-RECs from its customer-generators for a period of ten years in exchange for a rebate to help offset the customer's initial investment in solar generation. Ameren notified the Commission that it reached its stipulated limit on solar rebate payments in July 2022,² so the amount of SRECs from customer-generators will decrease over the planning period as older contracts expire.

C. “The projected total retail electric sales for each year;”

The Company provided annual projected retail electric sales through 2027, and these projections are consistent with those generated in its most recent integrated resource plan.³

D. “Any differences, as a result of RES compliance, from the utility’s preferred resource plan as described in the most recent electric utility resource plan filed with the commission in accordance with 4 CSR 240-22, Electric Utility Resource Planning;”

All of the resources and future projects identified by the Company are included in its most recent IRP update from February 2025.

E. “A detailed analysis providing information necessary to verify that the RES compliance plan is the least cost, prudent methodology to achieve compliance with the RES;”

The Company asserts the bulk of the resources employed planned for future RES compliance are from existing resources, so the costs associated with these resources are already included in revenue requirements. Also, according to the Company the resources that were not built for the primary purpose of RES compliance, do not count against the RES rate cap.

² ET-2014-0350. Item 46, July 8, 2022.

³ EO-2025-0235. Item 1, February 2, 2025.

However, Ameren does include some new solar resources over during the planning period. Traditionally the Company uses the selection of projects in its IRP as justification for the projects being considered least-cost, and the Company has not provided any additional “detailed analysis” in this docket. The lack of additional analysis concerns Staff since IRP modeling does not directly assess the least-cost option of complying with the RES.

Staff wants it to be clear that when it states it has not identified any deficiencies in Ameren’s filing, Staff has not made a ratemaking determination whether the Plan is the least cost, prudent method in complying with the RES, and recommends the Commission be clear in any Order it may issue in this case that it is not making any ratemaking determination.

- F. “A calculation of the RES retail rate impact (“RRI”) limit calculated in accordance with section (5) of this rule. The calculation should be accompanied by workpapers including all the relevant inputs used to calculate the retail rate impact limits for the planning interval which is included in the RES compliance plan. The electric utility may designate all or part of those calculations as highly confidential, proprietary, or public as appropriate under the commission’s rules;”**

The Company provided its RRI calculation in its filing, and the calculations result in a retail impact of ** [REDACTED] ** over the planning period. However, this calculated RRI does not include ** [REDACTED]

[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED] **.

In ER-2024-0319, the Company indicated it is evaluating utilizing Bowling Green and

Vandalia RECs for customer programs rather than RES compliance.⁴ ** [REDACTED]

[REDACTED]

[REDACTED]

[REDACTED] **. At this time, Staff does not
recommend refiling the RRI calculation for the current RES Plan ** [REDACTED]

[REDACTED] **.

G. “Verification that the utility has met the requirements for not causing undue adverse air, water, or land use impacts pursuant to subsection 393.1030.4, RSMo, and the regulations of the division.”

The Company attests in its Plan that “[a]ll generating facilities utilized by Ameren Missouri to meet the requirements of the Missouri Renewable Energy Standard have been certified by the Missouri Department of Economic Development in accordance with 393.1030.4, RSMo.”

⁴ ER-2024-0319, Steve Wills Surrebuttal testimony, page 18, line 16-18.

BEFORE THE PUBLIC SERVICE COMMISSION
OF THE STATE OF MISSOURI

In the Matter of Union Electric Company)	
d/b/a/ Ameren Missouri's Filing of its)	File No. EO-2025-0281
Renewable Energy Standard Compliance)	
Plan for 2025-2027)	

AFFIDAVIT OF MATTHEW W. LUCAS

STATE OF MISSOURI)	
)	ss.
COUNTY OF COLE)	

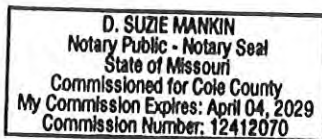
COMES NOW MATTHEW W. LUCAS and on his oath declares that he is of sound mind and lawful age; that he contributed to the foregoing *Staff Report* in memorandum form; and that the same is true and correct according to his best knowledge and belief.

Further the Affiant sayeth not.


MATTHEW W. LUCAS

JURAT

Subscribed and sworn before me, a duly constituted and authorized Notary Public, in and for the County of Cole, State of Missouri, at my office in Jefferson City, on this 27th day of May 2025.




Notary Public