

**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)	<u>File No. EO-2025-0281</u>
Renewable Energy Standard Compliance)	
Plan for 2025-2027)	

STAFF REPORT

COMES NOW the Staff of the Missouri Public Service Commission ("Staff"), by and through counsel, and for its *Staff Report* states as follows:

1. On April 15, 2025, Union Electric Company d/b/a Ameren Missouri ("Ameren Missouri") filed its Renewal Energy Standard ("RES") 2024 RES Compliance Report ("Report") and Compliance Plan ("Plan") for calendar years 2025 through 2027 as required by Commission Rule 20 CSR 4240-20.100(8).

2. Commission Rule 20 CSR 4240-20.100(8)(D) requires Staff to review Ameren Missouri's Compliance Plan and Report and file a Staff report within 45 days of the Compliance Plan and Report filing.

3. On April 17, 2025, the Commission issued its *Order Directing Notice of Filing* (the "Order"), which set a May 30, 2025, deadline for Staff to review the RES Compliance Report and Plan and file a report.

I. The Report

4. Commission Rule 20 CSR 4240-20.100(8)(A)1.A. through P. provide the minimum filing requirements for the RES Compliance Report.

5. As discussed in greater detail in *Staff's Memorandum*, attached and incorporated herein as Attachment A, Staff has examined the RES Compliance Report

and independently verified that Ameren Missouri has retired sufficient RECs to satisfy the 2024 RES requirements.

II. The Plan

6. Commission Rule 20 CSR 4240-20.100(8)(B)1.A. through G. establishes fundamental standards for RES Compliance Plans. As discussed in greater detail in *Staff's Memorandum*, attached and incorporated herein as Attachment B, Staff concluded that Ameren Missouri's Compliance Plan for 2025 through 2027 complies with those standards.

7. Staff's Memorandum notes that Ameren Missouri indicated in Case No. ER-2024-0319 that it is evaluating utilizing Bowling Green and Vandalia RECs for customer programs rather than RES compliance. ** [REDACTED]

[REDACTED]. ** At this time, Staff does not recommend refiling the retail rate impact ("RRI") calculation for the current RES Plan ** [REDACTED]

[REDACTED]. **

8. Staff has not made a ratemaking determination as to whether the Plan is the least expensive or prudent method for complying with the RES. Staff recommends that the Commission be explicit in any Order it may issue in this case that it is not making a ratemaking determination.

WHEREFORE, Staff respectfully submits its Staff Report on Ameren Missouri's 2024 Compliance Report and 2025 through 2027 RES Compliance Plan.

Respectfully Submitted,

/s/ Alexandra Klaus

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Missouri Public Service Commission

CERTIFICATE OF SERVICE

I hereby certify that true and correct copies of the foregoing were mailed, electronically mailed, or hand-delivered to all counsel of record on this 30th day of May, 2025.

/s/ Alexandra Klaus