

# 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 )  
Renewable Energy Standard Compliance )  
Plan and Renewable Energy Compliance )  
Report pursuant to 20 CSR 4240-20.100 )

**File No. EO-2020-0328**

## ORDER DIRECTING FILING

Issue Date: June 16, 2020

Effective Date: June 16, 2020

On April 15, 2020, Union Electric Company d/b/a Ameren Missouri filed its 2020 Renewable Energy Standard Compliance Plan<sup>1</sup> and 2019 Compliance Report, as required by Commission Rule 20 CSR 4240-20.100(8). Commission Rule 20 CSR 4240-20.100(8)(D) requires the Commission's Staff to review RES compliance reports and plans and file a report of its review with the Commission within 45 days of the date of filing; part (E) of the same rule allows the Office of the Public Counsel and other interested persons or entities to file comments, also within the same 45 days.

On May 29, 2020, Staff filed a report indicating it has completed its review of Ameren Missouri's RES Compliance Plan and found no deficiencies. Staff requested an extension to allow Ameren Missouri to respond to inquiries about the RES Compliance Report; the Commission granted the requested extension to both Staff and other interested persons or entities. On June 12, 2020, Staff filed a report indicating it has completed review of the RES Compliance Report and "verified Ameren Missouri has

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<sup>1</sup> The cover page of Ameren Missouri's Compliance Plan indicates the year 2019 but the introduction of the document indicates the plan addresses "the calendar years 2020-2022."

retired enough [Renewable Energy Credits<sup>2</sup>] to satisfy the 2019 RES requirements.” Staff advises Ameren Missouri did not report certain information about third-party credits and should apply for waiver of Commission Rule 20 CSR 4240-20.100(8)(A)1.I.

Also on June 12, 2020, Sierra Club filed comments to suggest Ameren Missouri’s 2019 Compliance Report could include credits from ineligible sources. Sierra Club’s comments propose any credits claimed from certain pulp and paper mills in Florida, Louisiana and South Carolina may not qualify under Missouri’s renewable energy standard. Sierra Club also questions whether such credits may be ineligible because they have already been claimed by another entity to satisfy a different renewable energy mandate. Sierra Club urges additional investigation and indicates it opposes, at this time, a waiver of information required by 20 CSR 4240-20.100(8)(A)1.I.

The Commission will direct Ameren Missouri to respond to Staff’s report and Sierra Club’s comments.

**THE COMMISSION ORDERS THAT:**

1. No later than July 1, 2020, Ameren Missouri shall file a response to Staff’s report and Sierra Club’s comments, both filed on June 12, 2020.
2. This order shall be effective when issued.



**BY THE COMMISSION**

A handwritten signature in dark ink, reading "Morris L. Woodruff".

Morris L. Woodruff  
Secretary

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<sup>2</sup>Commission Rule 20 CSR 4240-20.100(1)(M) defines “REC” as “Renewable Energy Credit, or Renewable Energy Certificate.”

Jana C. Jacobs, Regulatory Law Judge,  
by delegation of authority pursuant to  
Section 386.240, RSMo (2016).

Dated at Jefferson City, Missouri,  
on this 16th day of June, 2020.

**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 16<sup>th</sup> day of June 2020.**



  
**Morris L. Woodruff**  
**Secretary**

**MISSOURI PUBLIC SERVICE COMMISSION**

**June 16, 2020**

**File/Case No. EO-2020-0328**

**Missouri Public Service  
Commission**

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

***Sincerely,***

  
**Morris L. Woodruff**  
**Secretary**

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Recipients listed above with a valid e-mail address will receive electronic service. Recipients without a valid e-mail address will receive paper service.