

**BEFORE THE PUBLIC SERVICE COMMISSION
OF THE STATE OF MISSOURI**

In the Matter of The Application of Union)	
Electric Company d/b/a Ameren Missouri)	<u>Case No. EA-2025-0344</u>
For Permission and Approval and a)	Tracking No. JE-2025-0173
Certificate of Public Convenience and)	
Necessity)	

STAFF RECOMMENDATION

COMES NOW Staff of the Missouri Public Service Commission (“Staff”), by and through the undersigned counsel, and for its *Staff Recommendation* respectfully submits the following:

1. On June 26, 2025, Union Electric Company d/b/a Ameren Missouri (“Ameren Missouri”) filed a *Request for Waiver, Motion for Expedited Treatment, and Application* (“Application”). The Application is for a Certificate of Convenience and Necessity (“CCN”)¹ authorizing it to provide retail service to New Madrid Solar, LLC (“New Madrid Solar”) as needed under Midcontinent Independent System Operator’s (“MISO”) Schedule 20. The Application seeks authorization for Ameren Missouri to be identified as the retail provider to New Madrid Solar’s solar farm. Additionally, Ameren Missouri requests expedited treatment of this Application and seeks a variance from the 60-day notice requirements of 20 CSR 4240-4.017. Ameren Missouri requests approval of its Application and granting of the CCN no later than August 1, 2025.

2. Previously, on June 4, 2025, Ameren Missouri filed revised tariff sheets² with an effective date of July 7, 2025. The tracking number assigned to the revisions is JE-2025-0173. After discussions with Staff and agreement on the CCN requested in

¹ Pursuant to Section 393.170, RSMo, Commission Rule 20 CSR 4240-2.060 and 20 CSR 4240-20.045

² Schedule No. 6 1st Revised Sheet No. 34 canceling Original Sheet No. 34 and Original Sheet No. 34.1

this matter, Ameren Missouri filed substitute tariff sheets under the same tracking number on June 25, 2025. The changes in the substitute sheets include an update to the legal description of the involved territory and an updated effective date of August 1, 2025, to allow time for processing of this Application.

3. On June 27, 2025, the Commission directed Staff to file a recommendation regarding the requested CCN no later than July 15, 2025. This Order also set an intervention deadline of July 7, 2025.

4. On July 7, 2025, Renew Missouri Advocates d/b/a Renew Missouri (“Renew Missouri”) file its *Application to Intervene of Renew Missouri Advocates*. Their Application to Intervene clarifies Renew Missouri has not yet taken a final position on this matter.

5. As reflected in Staff’s Memorandum attached hereto and incorporated herein as **Appendix A**, Staff has reviewed the filing, along with information obtained through discovery and discussion with Ameren Missouri and representatives of New Madrid Solar. Staff is of the opinion that Ameren Missouri has fulfilled the requirements of the applicable Tartan Criteria³ for approval. Staff recommends that the Commission grant the requested CCN **with the condition that Ameren Missouri notify the Commission in this case if distribution facilities are constructed by Ameren Missouri to serve New Madrid Solar in the future.**

6. In the Application, Ameren Missouri requests a waiver of the 60-day filing notice of 20 CSR 4240-4.017(1). Ameren Missouri’s Application provided a verified declaration that it had not had communication with the Commission within the

³ Staff reviews CCN Applications based on the five factors the Commission listed in *In Re Tartan Energy*, GA-94-127, 3 Mo.P.S.C.3d 173, 177 (1994) (“Tartan Criteria”)

prior 150 days regarding any substantive issues likely to be in the case. Staff agrees good cause exists pursuant to 20 CSR 4240-4.017(1)(D) and recommends that the 60-day notice requirement be waived.

7. Staff has no objection to Ameren Missouri's request for expedited treatment of this Application. The request would allow the solar farm to be served by the expected in service date of September 2025 and coordinate with the August 1, 2025, effective date of the substitute tariff sheets.⁴

8. Further, regarding the proposed substitute tariff sheets associated with tracking number JE-2025-0173, Staff recommends a change. Specifically, that Ameren Missouri be ordered to indicate on Sheet No. 34 the location⁵ that Pemiscot-Dunklin Electric Cooperative, Inc. may provide emergency service to New Madrid Solar.

9. Staff's review shows Ameren Missouri's Application is in compliance with 20 CSR 4240-2.060 and 4240-20.045(4)(A-E);⁶ and Staff verified Ameren Missouri is authorized to do business with in the State and is in Good Standing with the Missouri Secretary of State.

WHEREFORE, for the reasons stated above, Staff recommends that the Commission expeditiously grant the requested CCN (including the condition outlined above), waive the 60-day notice filing, order the tariff sheet change outlined in paragraph 8 of this pleading, along with any further relief the Commission deems proper.

⁴ Ameren Missouri's Application, Page 7 Subsection V.

⁵ Using the Public Land Survey System.

⁶ General application requirements and requirements for Commission authorization via CCN to provide electric service to retail customers in the service area for an electric utility.

MO PSC Schedule No. 6

1st Revised Sheet No. 34, canceling Original Sheet No. 34

Original Sheet 34.1

Respectfully submitted,

/s/ Tracy D. Johnson

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CERTIFICATE OF SERVICE

I do hereby certify that a true and correct copy of the foregoing document has been hand-delivered, emailed or mailed, postage prepaid, to the parties of record as listed in the Service List maintained for this case by the Commission's Data Center, on this 15th day of July 2025.

/s/ Tracy D. Johnson