# 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, for Permission	)	
And Approval and Certificate of Public Convenience	)	File No. EA-2024-0237
And Necessity Authorizing it to Construct a Simple	)	
Cycle Natural Gas Generation Facility	)	

#### STAFF'S RECOMMENDATION

**COMES NOW** the Staff of the Missouri Public Service Commission ("Staff") and in response to the Commission's Order Directing Filing states:

- 1. On September 30, 2025,<sup>1</sup> Union Electric Company d/b/a Ameren Missouri filed its Request for Variance requesting that the Commission allow Ameren Missouri an additional thirty days to submit the study described in Paragraph 5.h of the October 17, 2024 Stipulation ("Stipulation") in this case, to be a part of its 2025 Annual Integrated Resource Planning Update ("IRP"). The said Paragraph 5.h stated that the anticipated IRP filing date was October 1.
- 2. On October 1, the Commission ordered Staff to file either a recommendation or a status report on the request for variance no later than October 10.
- 3. The request for variance concerns Paragraph 5.h of the Stipulation approved by the Commission. That provision contemplated that with certain data as described in Paragraph 5.h, Ameren Missouri would run its October 1, 2025, IRP Annual Update model and report the results in a study that would become a part of the IRP, but that Ameren Missouri would first give Grain Belt an opportunity to review the study.

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<sup>&</sup>lt;sup>1</sup> All date references will be to 2025 unless otherwise stated.

- 4. Ameren Missouri's motion states that the study has now been completed and provided to Grain Belt for review. The motion states that Grain Belt has indicated that it does not object to a delay in filing the study. It states that except for the described study, the remainder of the IRP update was being submitted on September 30.
- 5. Staff has reviewed the file, the Stipulation, and the pleadings. Staff does not oppose the request for variance allowing Ameren Missouri an additional 30 days to submit the study described in the premises.

**WHEREFORE**, Staff respectfully requests that the Commission will accept this pleading as compliant with its orders.

Respectfully Submitted,

<u>ISI Paul 7. Graham</u>

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Attorney for Staff of the Missouri Public Service Commission

### **CERTIFICATE OF SERVICE**

The undersigned certifies that true and correct copies of the foregoing was served on the Staff of the Missouri Public Service Commission and the Office of the Public Counsel via electronic mail (e-mail) on this 10th day of October, 2025.

Isl Paul 7. Graham

## BEFORE THE PUBLIC SERVICE COMMISSION

## OF THE STATE OF MISSOURI

In the Matter of Union Electric Company d/b/a Ameren Missouri for Permission and Approval and Certificates of Convenience and Necessity Authorizing it to Construct a Simple Cycle Natural Gas Generation Facility	) ) ) )	Case No. EA-2024-0237		
AFFIDAVIT OF BRAD J. FORTSON				

STATE OF MISSOURI ) ss. COUNTY OF COLE )

**COMES NOW BRAD J. FORTSON** and on his oath declares that he is of sound mind and lawful age; that he contributed to the foregoing *Staff Recommendation*; and that the same is true and correct according to his best knowledge and belief.

Further the Affiant sayeth not.

BRAD J. FORTSON

**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 \_\_\_\_\_\_ day of October 2025.

DIANNA L. VAUGHT Notary Public - Notary Seal State of Missouri Commissioned for Cole County My Commission Expires: July 18, 2027 Commission Number: 15207377

Notary Public