

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

In the Matter of the Application of Union Electric) **File No. EA-2024-0212**
Company d/b/a Ameren Missouri for Permission) Tracking No. JE-2026-0145
and Approval and a Certificate of Public) Tracking No. JE-2026-0160
Convenience and Necessity)

STAFF RECOMMENDATION

COMES NOW Staff of the Missouri Public Service Commission (“Staff”), by and through the undersigned counsel, and respectfully states as follows:

1. On May 22, 2026,¹ Union Electric Company d/b/a Ameren Missouri (“Ameren Missouri”) filed revised tariff sheets to implement the terms of the *Order Approving Stipulation and Agreement and Granting Certificate of Convenience and Necessity* (“Order”), issued by the Commission on October 23, 2024. The tariff sheets are assigned Tracking No. JE-2026-0145, with a requested effective date of June 21.

2. The Commission subsequently ordered Staff to file a recommendation regarding the revised tariff sheets no later than June 8.

3. On June 5, to provide time for Staff to review and verify the in-service criteria provided on June 3 and 4, conduct any additional discovery, ensure agreed to language from the Commission’s Order is in the tariff, and provide its recommendation to the Commission, Staff requested that the Commission suspend the effective date of the revised tariff sheets filed under Tracking No. JE-2026-0145, and issue an order directing Staff to file its recommendation in this matter no later than July 1.

4. Ameren Missouri responded that it had no objection to Staff’s request on June 10, and the Commission granted Staff’s request on June 12, suspending the tariff sheets filed under Tracking JE-2026-0145 until July 21.

¹ All dates referenced herein are to the year 2026, unless noted otherwise.

5. Ameren Missouri filed an additional revised tariff sheet, MO. P.S.C. Schedule No. 6, 4th Revised Sheet No 89.3, on June 12, under Tracking No. JE-2026-0160, incorporating the missing language from the Commission’s Order. This tariff bears an effective date of July 11.

6. Based on its review, as detailed in the Staff Memorandum attached and incorporated hereto as Appendix A, Staff recommends the Commission issue an order approving the following tariff sheets, filed on May 22 under Tracking No. JE-2026-0145, to take effect on July 21:

- MO. P.S.C. Schedule No. 6, 4th Revised Sheet No. 89, Canceling 3rd Revised Sheet No. 89
- MO. P.S.C. Schedule No. 6, 6th Revised Sheet No. 89.4, Canceling 5th Revised Sheet No. 89.4

7. Staff further recommends, as detailed in Appendix A, that the Commission issue an order approving the following tariff sheet, filed on June 12 under Tracking No. JE-2026-0160, to take effect on July 11:

- MO. P.S.C. Schedule No. 6, 4th Revised Sheet No 89.3, Canceling 3rd Revised Sheet No. 89.3

8. Staff has also confirmed that the New Florence Solar Center has met the in-service requirements ordered by the Commission.

WHEREFORE, Staff respectfully requests the Commission issue an order (1) approving the tariff sheets filed under Tracking No. JE-2026-0145, to take effect on July 21, 2026, (2) approving the tariff sheet filed under Tracking No. JE-2026-0160 to take effect on July 11, 2026, and any further relief deemed just and necessary under the circumstances.

Respectfully submitted,

/s/ Travis J. Pringle

Travis J. Pringle

Missouri Bar No. 71128

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CERTIFICATE OF SERVICE

I hereby certify that copies of the foregoing have been mailed or hand-delivered, transmitted by facsimile or electronically mailed to all parties and/or counsel of record on this 1st day of July, 2026.

/s/ Travis J. Pringle

MEMORANDUM

TO: Missouri Public Service Commission Official Case File
Case No. EA-2024-0212, Union Electric Company d/b/a Ameren Missouri's
Application for Permission and Approval and a Certificate of Public
Convenience and Necessity

FROM: Amanda Arandia July 1, 2026
Engineering Analysis / Date

SUBJECT: Staff Report and Conclusion on Union Electric Company d/b/a Ameren
Missouri's Tariff Revision JE-2026-0160 and JE-2026-0145
New Florence Solar In-Service Review

DATE: July 1, 2026

SUMMARY

On May 22, 2026 Union Electric Company d/b/a Ameren Missouri (“Ameren Missouri”) filed, under Tracking No. JE-2026-0145, its 4th Revised Sheet No. 89 and 6th Revised Sheet No. 89.4 to become effective on and after June 21, 2026 to implement the agreed to terms of the Unanimous Stipulation and Agreement (“Stipulation and Agreement”) filed in this case on October 9, 2024 and approved by the Commission October 23, 2024. Specifically item number 9 of the Stipulation and Agreement, which required Ameren Missouri to implement the rates provided in its "New Florence Solar Center Subscriber Model -HC.xml" workpaper for its Community Solar Program (“CSP”) Tariff and update the program term to 30 years. Ameren Missouri subsequently provided its in-service documentation for the New Florence Solar Center.

On June 12, 2026 Ameren Missouri filed its 4th Revised Sheet No. 89.3 to implement item number 8 of the Stipulation and Agreement which states:

8. The Signatories agree that Staff's proposed condition 1,¹ should be addressed as follows:

Ameren Missouri agrees to change paragraph 13 of its CSP Rider to include the addition in red line:

13. The cost associated with any unsubscribed portion of Program Resources will not be included in the revenue requirement used to establish base rates if subscriptions cover at least 50 percent of Program Resources. The cost to the subscribers shall be the same as if the Program Resource was fully subscribed. If subscriptions cover less than 50 percent of Program Resources, then the cost associated with the unsubscribed portion below 50 percent of Program Resources will be included in the revenue requirement used to establish base rates.

CONCLUSION

Staff has reviewed Ameren Missouri's 4th Revised Sheet No. 89 and 6th Revised Sheet No. 89.4 and 4th Revised Sheet No. 89.3 and agrees that the updated tariff sheets satisfy the requirements of the Stipulation and Agreement. Additionally, Staff has reviewed Ameren Missouri's submitted in-service documentation for its New Florence Solar Center and agrees that it meets the in-service criteria in the Staff Memo filed in this case on July 30, 2024, and agreed to in the Stipulation and Agreement. Staff's review of these criteria are included as Attachment A to this memo.

¹ Staff Proposed Condition 1: Ameren Missouri agrees to include tariff language such that in the event that the Project is subscribed to at least the 50% level but less than 100%, the cost to the customer shall be the same as if the Project was fully subscribed, leaving Ameren Missouri's shareholders to pay for any deficit.

Staff makes the following recommendations to the Commission:

- Approval of Ameren Missouri's 4th Revised Sheet No. 89.3, canceling its 3d Revised Sheet No. 89.3 of its tariff JE-2026-0160
- Approval of Ameren Missouri's 4th Revised Sheet No. 89 and 6th Revised Sheet No. 89.4 of its tariff JE-2026-0145
- That Ameren Missouri's New Florence Solar Center has met the in-service requirements

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and Necessity)

AFFIDAVIT OF AMANDA ARANDIA

STATE OF MISSOURI)
) ss.
COUNTY OF COLE)

COMES NOW AMANDA ARANDIA, and on her oath declares that she is of sound mind and lawful age; that she contributed to the foregoing *Staff Recommendation; in Memorandum form*; and that the same is true and correct according to her best knowledge and belief.

Further the Affiant sayeth not.

Amanda Arandia
AMANDA ARANDIA

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 1st day of July 2026.

Dianna L. Vaughn
Notary Public

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

Solar Electrical Generator In-Service Test Criteria

1. All Solar Block Circuit major construction work is complete.

Ameren Missouri has provided a Substantial Completion Inspection Request/Certificate of Substantial Completion which indicates that the New Florence Community Solar Center was inspected on June 3, 2026 and accepted as substantially complete by Ameren's inspector.

The above documentation was accompanied by a substantial completion punchlist which indicates that no substantial work has yet to be completed.

2. All Solar Block Circuit preoperational tests have been successfully completed.

Ameren Missouri provided the following documentation indicating that all preoperational tests have been successfully completed:

- AZIMUTH ENERGY Cold Commissioning Report, dated May 29, 2026, confirming that the (47) SMA Peak 3 inverters at the facility have been installed according to the engineered drawings, and the associated installation manuals of the equipment, following workmanship best practices.
- AZIMUTH ENERGY Hot Commissioning Report, dated May 29, 2026, confirming that all inverters operate and generate, can be communicated with and controlled via Ameren SCADA system, and passed the required Utility Witness Testing for autonomous startup and shutdown.
- AMPACITY Service and Commissioning Report, dated May 22, 2026, confirming tracker operate successfully.

3. Facility or Solar Block Circuit successfully meets contract operational guarantees that are necessary for satisfactory completion of all other items in this list.

The only contract operational guarantee that is necessary for completion of other items on the list is the successful completion of the capacity test, which was provided.

4. Upon observation of the facility or Solar Block Circuit for 72 consecutive hours, the facility or Solar Block Circuit will have demonstrated that when sunlight was shining on it during that period it produced power in a standard operating mode.

Ameren Missouri provided data for a continuous 72-hour period which demonstrated that the facility successfully produced power during daylight hours.

During this time Staff noted that there were multiple interruptions. Ameren Missouri provided clarification as to the causes of those interruptions via email on June 26, 2026 and a meeting with Staff on July 1, 2026. Among those causes were breakers tripping, curtailing required by MISO, and lower irradiance. The tripped breakers are under warranty and planned to be replaced July 7, 2026 and sent for root cause analysis. Even with these interruptions, Ameren Missouri provided data for a continuous 72-hour period that was not affected by breaker trips or MISO curtailment.

5. Facility or Solar Block Circuit shall meet at least 95% of the guaranteed capacity (in MW AC) based on the Capacity Test provided in the response to DR 21 in EA-2024-0212. The Capacity Test shall determine the facility's Corrected Capacity at the Design Point Conditions.

Ameren Missouri provided the Capacity Test Report along with its calculations in an excel spreadsheet. The report and calculations show the facility's corrected capacity at the design point conditions and illustrate that the facility meets greater than 95% of the guaranteed capacity.

6. Sufficient transmission/distribution interconnection facilities shall exist for the total plant design or Solar Block Circuit net electrical capacity at the time the facility or Solar Block Circuit is declared fully operational and used for service.

Ameren Missouri provided its Interconnection Agreement dated October 11, 2023 for a 4.9 MW solar generation project, Montgomery County Community Solar Center 2¹ along with a letter dated September 25, 2023 indicating that Montgomery County Solar Center 1 regularly produces up to 6.5 MW and that the Montgomery County Community Solar Center 2 would be limited to 4.9 MW. The letter also indicates that Ameren Missouri completed a formal interconnection study for the second project and found that the combined resources could produce up to 12.8 MW-indicating that a second facility could produce up to 6.3 MW- at a fixed power factor of 98% with no adverse impact. However operation during distribution system contingency conditions could produce objectionable rapid voltage change and that in order to avoid exceeding RVC limits, Ameren Missouri reserves the right to curtail solar plant operation during such conditions.

Additionally, Ameren Missouri provided a memo dated February 4, 2024 indicating that subsequent to the 2023 study, Rapid Voltage Change evaluations were completed using a new model of the New Florence substation and related 34.5 kV system, and it was determined that output totaling 14.2 MW is expected to be possible. This indicates that the site can accommodate the 7 MW facility.

Staff requested additional information as to how it was determined that the capacity could be upgraded from the 12.8 MW in the Interconnection Agreement to the 14.2 MW in the memo. Ameren subsequently provided clarification that Montgomery County Solar Center 1 is actually 5.7 MW making the total between the two facilities 12.7 MW.

7. Sufficient transmission/distribution facilities shall exist for the total plant design net electrical capacity into the utility service territory at the time the facility or Solar Block Circuit is declared fully operational and used for service.

See above discussion related to Ameren Missouri's Interconnection Agreement.

¹ The Interconnection Agreement refers to the facility as Montgomery County Community Solar Center 2, however Ameren Missouri has referred to the facility as the New Florence Community Solar Center.