

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

In the Matter of Ameren Missouri’s 2020)	
Utility Resource Filing pursuant to 20 CSR)	File No. EO-2021-0021
4240 – Chapter 22.)	

JOINT FILING

COMES NOW Union Electric Company, d/b/a Ameren Missouri ("Ameren Missouri" or "the Company"), the Staff of the Missouri Public Service Commission ("Staff"), Clean Grid Alliance, Renew Missouri Advocates ("Renew Missouri"), National Association for the Advancement of Colored People ("NAACP"), New Northside Missionary Baptist Church, Inc. ("NNMBC"), Dutchtown South Community Corporation ("DSCC"), Missouri Industrial Energy Consumers ("MIEC"), and the Sierra Club ("SC"),¹ and state as follows:

1. Ameren Missouri made its Chapter 22 Integrated Resource Plan ("IRP") filing on September 27, 2020.
2. On or before March 31, 2021, parties in this case filed reports alleging certain deficiencies and/or raising concerns, or filed comments regarding the compliance of Ameren Missouri’s September 27, 2020 filing with Rule 20 CSR 4240-22. The parties filing reports or comments were Staff, Sierra Club, Clean Grid Alliance, NAACP, DSCC, NNMBC, MIEC, and Renew Missouri. There were other parties to this case that did not file comments or a report alleging deficiencies in, or concerns with, Ameren Missouri’s IRP filing.²

¹ The signatories are the only parties to file deficiencies or concerns in this case.
²Comments were submitted by one entity that was not ultimately granted intervention. Accordingly, those comments are not addressed in this pleading.

3. Rule 20 CSR 4240-22.080(9) provides:

If the staff, public counsel or any intervenor finds deficiencies in or concerns with a triennial compliance filing, it shall work with the electric utility and the other parties to reach, within sixty (60) days of the date that the report or comments were submitted, a joint agreement on a plan to remedy the identified deficiencies and concerns. If full agreement cannot be reached, this should be reported to the commission through a joint filing as soon as possible, but no later than sixty (60) days after the date on which the report or comments were submitted. The joint filing should set out in a brief narrative description those areas on which agreement cannot be reached. The resolution of any deficiencies and concerns shall also be noted in the filing.

4. Ameren Missouri and the signatories to this pleading have reached a joint agreement on a plan to remedy some of the alleged deficiencies and concerns, as set forth in Attachment A to this pleading, which is incorporated as if fully set forth herein. Also set forth in the Attachment is a listing and brief narrative descriptions of those areas on which agreement has not been reached. These unresolved matters will be addressed in more detail in Ameren Missouri's *Response* to the filed comments submitted contemporaneously with this filing.

5. Further, there may be instances where a party has not identified a deficiency or concern similar to that of another party, does not agree with a deficiency or concern identified by another party, and/or does not agree with the resolution that has been reached between that other party and Ameren Missouri. When such situations occur, they may be indicated by a footnote.

WHEREFORE, the undersigned parties to this Joint Filing ask the Commission to accept this pleading as fulfilling the requirements of 4 CSR 240-22.080(9).

Respectfully submitted,

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ATTORNEYS FOR THE SIERRA CLUB

CERTIFICATE OF SERVICE

The undersigned hereby certifies that a true and correct copy of the foregoing Ameren Missouri Response to Alleged Deficiencies and Concerns was served on all parties of record via electronic mail (e-mail) on this 18th day of June, 2021.

/s/ Wendy K. Tatro _____
Wendy K. Tatro