

**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) File No. EO-2021-0352
Standard Compliance Plan and Renewable Energy)
Compliance Report pursuant to 20 CSR 4240-20.100.)

REQUEST FOR WAIVER

COMES NOW, Union Electric Company, d/b/a Ameren Missouri ("Ameren Missouri"), and for its request for a waiver of a portion of the Missouri Public Service Commission’s ("Commission") Renewable Energy Standard ("RES") rules, found at 20 CSR 4240-20.100(8)(A)1.I, states as follows:

1. As part of its efforts to comply with Missouri’s RES, Ameren Missouri has purchased and will continue to purchase Renewable Energy Credits ("RECs") from various sources.

2. Ameren Missouri asks the Commission to grant it a variance from a portion of its regulations related to meter reads for RECs purchased from third parties as long as those purchased RECs are lawfully registered in the North American Renewables Registry ("NAR"). As the Commission is aware, NAR is the registry selected by the Commission to track RES compliance by utilities.

3. 20 CSR 4240-20.100(8)(A)1.I requires the Annual RES Compliance Report to provide various categories of information related to generating facilities owned/operated by third parties from which RECs are acquired to meet the RES. Much of that information is not held by Ameren Missouri, but can be found in the NAR. Staff’s Report indicated it was able to verify almost all of this information in NAR. However, NAR does not include meter read information as specified in 20 CSR 4240-20.100(8)(A)1.I.V, and Ameren Missouri also does not have that information for most third party REC purchases. While meter reads are one way to prevent double

counting of a generated REC, the Commission's use of NAR for holding and retiring RECs also prevents double counting from occurring. If a REC is certified by NAR, the Commission can be assured there is no double counting as NAR will only allow a REC to exist in one location. And once a REC is transferred (retired) into the Commission's NAR account, it cannot be used again. Therefore, good cause exists for waiver of the requirement to provide meter reads for third party REC purchases registered in the NAR.

4. For the good cause shown above, Ameren Missouri requests the Commission grant it a variance from the meter reads requirement of 20 CSR 4240-20.100(8)(A)1.I.V

WHEREFORE, Ameren Missouri requests the Missouri Public Service Commission grant it a waiver of 20 CSR 4240-20.100(8)1.I.V as set forth above.

Respectfully submitted,

/s/ Wendy K. Tatro

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CERTIFICATE OF SERVICE

The undersigned certifies that a true and correct copy of the foregoing document was sent by electronic transmission, facsimile or email to all counsel of record on this 1st day of July, 2021, to the Missouri Public Service Commission Staff and to the Office of the Public Counsel.

/s/ Wendy K. Tatro
Wendy K. Tatro