

**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>File No. EA-2022-0245</u>
for Approval of a Subscription-Based)	Tracking No. YE-2023-0010
Renewable Energy Program)	

**STAFF'S STATUS REPORT
AND PROCEDURAL RECOMMENDATION**

COMES NOW the Staff of the Missouri Public Service Commission ("Staff"), by and through counsel, and states:

On July 14, 2022,¹ Union Electric Company d/b/a Ameren Missouri filed an application with the Commission seeking an order granting a Certificate of Convenience and Necessity (CCN) pursuant to Sections 393.140, 393.170.1 and 393.190.1, RSMo. The CCN would authorize Ameren Missouri to construct, install, own, operate, maintain, and otherwise control and manage a 150 megawatt (MW) solar generation facility, located in White County, Illinois (referred to as the "Boomtown Solar Project") pursuant to a Build Transfer Agreement (BTA) with Boomtown Solar Holdings LLC. The Commission ordered Staff to file a recommendation on the application or a status report stating when it expects to file a recommendation no later than August 30,

Staff reports to the Commission that discovery between Staff and Ameren Missouri is ongoing. Staff has propounded data requests and awaits responses which will, in turn, need analysis; and, in light of the Illinois location of the solar generation facility and the attendant jurisdictional factors, anticipates a high likelihood that Staff will need to propound follow-up data requests whose responses will require further analysis.

¹ All date references will be to 2022 unless otherwise stated.

As a two-track procedure calculated to advance the case to a resolution, Staff asks the Commission to allow it either to file a recommendation as soon as it can or, in lieu, to file rebuttal testimony no later than December 21 in response to the direct testimony which Ameren Missouri has filed with its initial application; and Staff suggests that the Commission now issue a procedural schedule as follows or one which accommodates a response from Ameren Missouri (and other parties) as to a procedural schedule.

Rebuttal Testimony	December 21, 2022
Surrebuttal Testimony	January 11, 2023
Hearings	January 30 – February 2, 2023
All Briefing Completed	February 24, 2023

WHEREFORE, the Commission Staff respectfully prays for the relief described in the premises.

Respectfully Submitted,

/s/ Paul T. Graham #30416
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CERTIFICATE OF SERVICE

The undersigned by his signature below certifies that the foregoing pleading was served upon all counsel of record on this August 30, 2022 by electronic filing in EFIS, electronic mail, hand-delivery, or U.S. postage prepaid.

/s/ Paul T. Graham