

**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 Approval of a Subscription-Based)
Renewable Energy Program)

Case No. EA-2022-0245

PUBLIC COUNSEL’S POSITIONS

The Office of Public Counsel’s positions on the issues follow:

A. Does the evidence establish that the 150 megawatt (“MW”) solar generation facility to be constructed in White County, Illinois (the "Boomtown Solar Project" or "Project") for which Ameren Missouri is seeking a certificate of convenience and necessity (“CCN”) necessary or convenient for the public service?

Public Counsel’s Position: No. The Boomtown Solar Project is not an improvement that justifies what it will cost Ameren Missouri’s retail customers as a whole.

1. Should the Commission find that the Project satisfies the first *Tartan* Factor of need?

Public Counsel’s Position: No. Ameren Missouri’s retail customers need firm, reliably dispatchable generating capacity to serve them. If a subset of Ameren Missouri’s retail customers who desire electricity from renewable generating resources bear *all* of the risks of operational (including infirm dispatchability) and adverse economic impacts of Ameren Missouri’s Boomtown Solar Project on its retail customers and completely insulate Ameren Missouri’s other retail customers from those impacts, then the factor of need might be satisfied.

2. Should the Commission find that the Project satisfies the second *Tartan* Factor of economic feasibility?

Public Counsel’s Position: No. The evidence does not show that the Boomtown Solar Project will generate more revenues (energy and capacity market revenues) and avoid more costs than the costs Ameren Missouri’s retail customers will incur (capital, reliability, power quality, and operations and maintenance) if Ameren Missouri builds it.

3. Should the Commission find that the Project satisfies the third *Tartan* Factor of ability to finance?

Public Counsel’s Position: Only if the evidence supports that finding.

4. Should the Commission find that the Project satisfies the fourth *Tartan* Factor of qualified to construct?

Public Counsel’s Position: Only if the evidence supports that finding.

Missouri Bar No. 35512

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CERTIFICATE OF SERVICE

I hereby certify that copies of the foregoing have been mailed, hand-delivered, transmitted by facsimile or electronically mailed to all counsel of record this 27th day of January 2023.

/s/ Nathan Williams