

In the Matter of the Application of Union Electric )  
Company d/b/a Ameren Missouri for Certificates of ) File No. EA-2023-0286  
Convenience and Necessity for Solar Facilities. )

**COMES NOW** Union Electric Company d/b/a Ameren Missouri ("Company" or "Ameren Missouri"), and for its response to the Staff's November 24, 2025, Recommendation in this case, states as follows:

2. While the Company does not agree with the Staff’s rationale for suspending the tariff, the Company will, in the next few days, provide the Staff documentation demonstrating that the Vandalia solar facility has met the agreed-upon in-service criteria (expected to be provided no later than December 9, 2025). This should resolve the issues Staff raises in the near-term and allow subscribers to be charged under the Program based *only* on the output of the Vandalia facility. For clarity, no charges associated with the other facility that will ultimately also apply to Program Phase No. 3 subscribers (the Bowling Green facility) will be assessed to subscribers until such time as the Bowling Green facility is fully operational and used for service.<sup>1</sup>

<sup>1</sup> The Company will also later provide documentation relating to Bowling Green’s compliance with the in-service criteria when the criteria have been met near the time of its completion (which is expected to occur in the first quarter of 2026).

extended the tariff effective date to December 19, 2025.<sup>2</sup> There is, therefore, no need for any order from the Commission suspending the tariff. While the Company expects that the Staff can complete its review in advance of the extended effective date of December 19, 2025, should the Staff require additional time, the Company would be agreeable to a further modest extension of the tariff effective date.

4. Based on the foregoing, the Company requests that the Commission make no order respecting the tariff at this time and commits to making a further filing in this docket by December 17, 2025, respecting the Staff's review.

**WHEREFORE**, Ameren Missouri submits this response to the Staff Recommendation.

Respectfully Submitted,

/s/ **James B. Lowery**

**James B. Lowery**, Mo. Bar #40503

JBL LAW, LLC

9020 S. Barry Rd.

Columbia, MO 65201

Telephone: 573-476-0050

E-Mail: [lowery@jblawllc.com](mailto:lowery@jblawllc.com)

**ATTORNEY FOR UNION ELECTRIC  
COMPANY d/b/a AMEREN  
MISSOURI**

---

<sup>2</sup> As the Commission knows, tariff sheet effective dates can be extended in EFIS by the utility submitting the tariff, which the Company has done here, and which will prevent the tariff from taking effect until the extended effective date. See the attached screenshot showing that the extension has been completed.

**CERTIFICATE OF SERVICE**

The undersigned certifies that true and correct copies of the foregoing was served on the Staff of the Missouri Public Service Commission and the Office of the Public Counsel via electronic mail (e-mail) on this 2<sup>nd</sup> day of December, 2025.

/s/ James B. Lowery

Upcoming items that will automatically apply a change to the tariff are displayed with a light blue background.

Item No.	Date Filed	Item Type	Purpose of Filing	Item Status	Effective Date												
1	11/12/2025 10:31 AM	Revise Tariff	The purpose of the new tariff Sheet No. 83.8 is to establish rates for Phase 3 of its Renewable Solutions Program. <b>Tariff Sheet Details:</b> original sheet no. 83.8	Effective	12/12/2025												
Attachments ▼																	
<table><tr><th>Name</th><th>Size</th><th>Security</th></tr><tr><td><a href="#">RSP Phase 3 filing letter.pdf</a></td><td>105.76 KB</td><td>Public</td></tr><tr><td><a href="#">UEC E Sheet No. 83.8 (Rider RSP) Renewable Solutions Phase 3 Prices 12-12-2025.pdf</a></td><td>82.46 KB</td><td>Public</td></tr><tr><td colspan="3">Total: 2 file(s), 188.22 KB</td></tr></table>						Name	Size	Security	<a href="#">RSP Phase 3 filing letter.pdf</a>	105.76 KB	Public	<a href="#">UEC E Sheet No. 83.8 (Rider RSP) Renewable Solutions Phase 3 Prices 12-12-2025.pdf</a>	82.46 KB	Public	Total: 2 file(s), 188.22 KB		
Name	Size	Security															
<a href="#">RSP Phase 3 filing letter.pdf</a>	105.76 KB	Public															
<a href="#">UEC E Sheet No. 83.8 (Rider RSP) Renewable Solutions Phase 3 Prices 12-12-2025.pdf</a>	82.46 KB	Public															
Total: 2 file(s), 188.22 KB																	
2	12/2/2025 4:25 PM	Extend Effective Date	Extend Effective Date to 12/19/2025	Effective	12/19/2025												