

requirement to provide capacity necessary to cover the Company’s load and planning reserve margin requirement (“PRMR”)¹ at the time of reporting, the Company will first seek to procure additional capacity bilaterally, and if successful the Company will report the additional bilateral capacity in SRM Reporting Template Exhibit 6, Contracted Resources. If, however, the full additional volume is not purchased bilaterally, the remaining additional volume needed will be bought in the MISO Planning Resource Auction (“PRA”), which the Company would report on SRM Reporting Template Exhibit 3, Planning Resources, specifically in row 44 ‘Auction Purchases Planned MW’. The Company suggests that the rule be clarified to confirm that this is the preferred approach to populating the SRM Reporting Template in such a circumstance, instead of taking an alternative reporting approach, which would be to enter a bilateral placeholder contract on SRM Reporting Template Exhibit 6, Contracted Resources.

2. Comments on the SRM Reporting Template.

- a. The definition of “forecast peak demand” itself is clear. However, in the SRM Reporting Template, the forecast peak demand is requested both for the utility’s customer load and for the “region.” Consequently, the rule or the SRM Reporting Template should specify whether the forecast peak demand for the “region” refers to MISO Local Resource Zone 5, the MISO Central Region, or all MISO regions combined.
- b. SRM Reporting Template Exhibit 3, Line 8, seeks a “Planning Reserve Margin Required Capacity.” However, it does not ask for additional pertinent information, that is, the Planning Reserve Margin Percentage. Consequently, the Company recommends

¹ “PRMR” as used herein is the “base” PRMR plus Resource Adequacy Adders to the PRMR determined by MISO when it issues the final PRMR after the PRA clears for each Planning Year.

adding a new Line 8, “Planning Reserve Margin %, including any applicable RTO adjustment made thereto.”² Former Line 8 would then become Line 9.

- c. SRM Reporting Template Exhibit 5 contains column (c), seeking the commercial operation date of resources the utility already owns. There is no need for that information since that date does not determine or affect the resource's capacity and its contribution to resource adequacy. Consequently, that column should be removed. The commercial operation date column in Exhibit 7 is needed because a planned resource will not begin providing capacity to meet resource adequacy until it is commercially operational. The Company recommends one other change to Exhibit 5 as well, that is, additional rows should be added to accommodate the number of units that will need to be reported.³
- d. SRM Reporting Template Exhibit 6 is labelled “Contracted Resources,” but that phrase is not defined in the proposed SRM rule. So that utilities know exactly what resources to report on SRM Reporting Template Exhibit 6, the rule should define “Contracted Resources.” In addition, capacity for which the Company contracts typically consists of Zonal Resource Credits (“ZRCs”). However, at the time the SRM reporting takes place, the Company will not always know the location of the resource that will produce the ZRCs. Therefore, the “Y/N” questions on Exhibit 6 should also allow a response of “unknown” (i.e., columns (d), (e), (f), (g), and (h).) The “Maximum Operating Capacity Contracted” columns ((i), (j), (k), (l)) should also allow the response of “unknown,” or could be eliminated entirely. When the Company acquires ZRCs, the maximum capability of the unit that will produce the ZRCs doesn’t matter since the

² In MISO, after the PRA clears, MISO may add an adder such as its Reliability-Based Demand Curve Adder” which will then produce a final Planning Reserve Margin Percentage.

³ At this time, Ameren Missouri requires 110 rows in order to report.

Company is only counting on, and only has rights, to the specified quantity of ZRCs. Finally, there appears to be flaws in some of the dropdowns and formulas used in SRM Reporting Template Exhibit 6. For example, the dropdowns for columns (d) through (h) appear to be inoperable.

The Company appreciates the opportunity to provide these comments and will have representatives available at the scheduled hearing in this docket to answer questions about them.

WHEREFORE, Ameren Missouri submits the foregoing comments and recommends the Commission adopt the proposed SRM Rule (20 CSR 4240-23.040) and the SRM Reporting Template referenced therein, after making the modifications and providing the clarifications outlined in these Comments.

Respectfully submitted,

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