August 6, 2021

Federal Energy Regulatory Commission

888 First Street, N.E.

Washington, D.C. 20426

The Honorable Richard Glick, Chairman

The Honorable Neil Chatterjee, Commissioner

The Honorable James Danly, Commissioner

The Honorable Allison Clements, Commissioner

The Honorable Mark C. Christie, Commissioner

**Re: Spire STL Pipeline LLC Application for Temporary Emergency Certificate in**

**Docket No. CP17-40-007**

Dear Chairman Glick and Commissioners,

Ameren Services Company, on behalf of Ameren Corporation ("Ameren"), writes today to express support for the July 26, 2021 application by Spire STL Pipeline LLC ("Spire Pipeline") for a temporary emergency certificate, or, in the alternative, limited term certificate. Ameren entities serve electric and natural gas customers in Missouri and Illinois, and make significant investments in energy infrastructure to reliably serve customers and meet the needs of our communities. Ameren greatly values and depends on sound, predictable regulatory policies when making those investment decisions – decisions made to ensure reliable, resilient, affordable service to customers.

Spire Pipeline placed facilities into service in 2019 after the Commission, in 2018, approved a Certificate of Public Convenience and Necessity ("certificate"). The June 2021 decision of the U.S. Court of Appeals for the District of Columbia Circuit to vacate Spire Pipeline's certificate raises significant policy issues that require thoughtful consideration and necessitate the Commission granting the requested temporary or limited term certificate to prevent disruption and harm that may come as a result of vacatur of the certificate. Ameren takes this view notwithstanding the prior position of certain Ameren subsidiaries in the underlying proceeding because of the need to provide certainty once infrastructure decisions are made and assets placed into service. In this case, Spire Pipeline has been operating for nearly two years. Moreover, if the Commission declines to grant the request, the Commission's action may have negative implications for future infrastructure projects as developers consider the significant regulated energy infrastructure investments that will be needed to reach the clean energy goals contemplated by the Biden Administration.

Ameren Services Company respectfully requests that the Commission consider these comments and promptly grant Spire Pipeline's request.

 Respectfully,

 

 Chonda J. Nwamu

 Senior Vice President, General Counsel &

 Secretary

 Ameren Corporation

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cc: All Parties