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July 9, 2015

Ms. Natelle Dietrich  
Director Utility Operations  
Missouri Public Service Commission  
P.O. Box 360  
Jefferson City, Missouri 65102

Case No. EW-2015-0105 – MEEIA Effectiveness Review Workshop

Dear Ms. Dietrich:

On July 8, 2015, Ameren Missouri filed its comments with attached Exhibits A and B in the above-referenced docket. Attached to this letter as Exhibit C are additional comments that Ameren Missouri would like to submit for consideration, in addition to the comments that were filed on July 8, 2015.

Sincerely,

*Matthew R. Tomc*

Matthew R. Tomc

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## Avoided Utility cost definitions

- Utility avoided demand cost – shall include the capacity cost of generation, transmission and distribution facilities, adjusted to reflect reliability reserve margins and capacity losses on the transmission and distribution systems, or the corresponding market-based equivalents of those costs. (22.050(5)(A)1)
- Utility avoided energy cost – shall include the fuel costs, emission allowance costs, and other variable operation and maintenance costs of generation facilities, adjusted to reflect energy losses on the transmission and distribution systems, or the corresponding market-based equivalents of those costs. (22.050(5)(A)2)
- Avoided probable environmental costs – include the effects of the probable environmental costs calculated pursuant to 4 CSR 240-22.040(2)(B) on the utility avoided demand cost and the utility avoided energy cost. (22.050(5)(A)3)
  - 22.040(2)(B) states: The probable environmental costs of each potential supply-side resource option shall be quantified by estimating the cost to the utility to comply with additional environmental legal mandates that may be imposed at some point within the planning horizon.
  - Separately, 22.020(47) defines Probable environmental cost as: the expected cost to the utility of complying with new or additional environmental legal mandates, taxes, or other requirements that, in the judgment of the utility decision makers, may be imposed at some point with in the planning horizon which would result in compliance costs that could have a significant impact on utility rates.