

**BEFORE THE PUBLIC SERVICE COMMISSION
OF THE STATE OF MISSOURI**

In the Matter of a Determination of Special)	
Contemporary Resource Planning Issues to be)	<u>Case No. EO-2012-0039</u>
Addressed by Ameren Missouri in its Next)	
Triennial Compliance Filing or Next Annual)	
Update Report)	

PUBLIC COUNSEL’S LIST OF SPECIAL CONTEMPORARY ISSUES

COMES NOW THE Office of the Public Counsel and for its List of Special Contemporary Issues states as follows:

1. Pursuant to 4 CSR 240-22.080(4), Staff, Public Counsel, and other interested parties may annually recommend special contemporary issues for each electric utility to address. Public Counsel recommends that the Commission order Union Electric Company d/b/a Ameren Missouri to analyze and document the following issues in its April 1, 2012 annual update report. Because the Staff and the Environmental Organizations¹ have already identified a number of important issues, Public Counsel will reference the issues identified in their filings.²

2. Public Counsel supports the issues identified by the Staff. Public Counsel suggests that Staff’s issue 4 be expanded to include flat or declining use per residential customer from any cause, not limited to an economic downturn or the loss of customers. Public Counsel recommends that Staff issue 7 also include updates to capital costs and operating cost estimates for nuclear generation.

3. Public Counsel supports many of the issues identified by the Environmental Organizations, in particular issues 3, 5, 7 and 8. Public Counsel does not agree, however, that an

¹ The Natural Resources Defense Council, Sierra Club, Renew Missouri, Mid-Missouri Peaceworks, and Great Rivers Environmental Law Center.

² Although this filing references the filings of other parties, Public Counsel makes this filing pursuant to 4 CSR 240-22.080(4)(A), not 4 CSR 240-22.080(4)(B).

analysis of the use of a future test year as a ratemaking tool should be ordered. There are enough special contemporary issues that bear directly on resource planning without interjecting a study of a radical departure from traditional ratemaking.

WHEREFORE, Public Counsel respectfully submits its List of Special Contemporary Issues.

Respectfully submitted,

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CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing has been emailed this 15th day of September 2011 to the parties of record:

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