

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

In the Matter of Union Electric)	
Company d/b/a Ameren Missouri's)	
2013 Integrated Resource Plan)	File No. EO-2013-0424
Annual Update Report)	

**COMMENTS OF THE MISSOURI DEPARTMENT
OF NATURAL RESOURCES**

COMES NOW the Missouri Department of Natural Resources ("MDNR") and submits the following comments on Ameren Missouri's ("Ameren") 2013 Annual Update Report and Workshop pursuant to 4 CSR 240-22.080(3)(D).

Ameren submitted its 2013 Annual Update report in File No. EO-2012-0357 on March 15, 2013. Ameren followed up its report with an update meeting on April 5, 2013 and submitted its Summary Report on April 15, 2013. MDNR is a stakeholder in the Ameren 2011 IRP case (File No. EO-2011-0271), its 2012 annual update (File No. EO-2012-0357) and its 2013 annual update (File No. EO-2013-0424).

Ameren has done a thorough job in updating its 2011 IRP, has made appropriate adjustments in its forecasts to account for changes in natural gas prices and forecast load, has updated its preferred plan (see File No. EO-2013-0392), and has addressed the Commission's special contemporary issues, established in EO-2013-0104. One area warrants comment in regard

to Ameren's upcoming triennial filing, which represents a potentially significant change in operating conditions since 2011; namely, Ameren's load forecast.

Ameren has changed its preferred plan in response to beginning its Missouri Energy Efficiency Investment Act (MEEIA) programs, in File No. EO-2013-0392, which is a positive step. Ameren's MEEIA portfolio is anticipated to produce incremental energy savings equal to 0.6% of sales in 2013, 0.7% of sales in 2014 and 0.8% of sales in 2015, which signals a change in Ameren's load profile, which should be addressed in Ameren's 2014 triennial filing.

MDNR raises this issue as Ameren is completing the planning for its 2014 triennial filing. This filing will incorporate a new DSM potential study, a year of experience with Ameren's current MEEIA programs, and potential progress on the development of small nuclear reactors for the Callaway site. Each of these developments will have an impact on Ameren's load forecast and its eventual preferred plan. MDNR encourages Ameren to take such developments into account as it formulates its next triennial plan.

Summary

The implementation of Ameren's MEEIA DSM portfolio is proceeding at a good pace. These developments may call for consideration of changes in the resource mix in Ameren's long-range planning.

MDNR commends Ameren for providing an update report and update session that communicated major developments in its operations and a change in its preferred plan over the past year. In MDNR's view, Ameren has provided a very useful report and an informative and productive stakeholder update session.

WHEREFORE, MDNR respectfully submits these comments.

Respectfully submitted,

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CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing has been transmitted by electronic mail to all counsel of record this 15th day of May 2013.

/s/ *Jeremy D. Knee*
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