

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

In the Matter of Union Electric Company)	
d/b/a Ameren Missouri's Tariffs to)	Case No. ER-2014-0258
Increase Its Revenues for Electric)	
Service.)	

MOTION FOR ADMISSION OF EXHIBIT 65HC

Union Electric Company d/b/a Ameren Missouri ("Ameren Missouri" or "the Company") moves the Commission to accept into evidence Exhibit 65HC. In support of its motion, Ameren Missouri states:

1. During the March 6, 2015, evidentiary hearing, Ameren Missouri offered into evidence Exhibit 65HC. Counsel for Sierra Club objected on grounds the exhibit and questions about the exhibit were beyond the scope of proper redirect examination (Transcript pp. 1951-52), but the Regulatory Law Judge deferred ruling on the motion until transcripts became available.

2. The following questions and answers were part of Sierra Club's cross-examination of Mr. Michels:

Q. At the same time, the company also assumes that other companies will retire some of their generating units in part in response to greenhouse gas regulations; is that correct?

A. That's correct.

Q. So essentially isn't it true that Ameren Missouri's 2014 IRP assumes an 85 percent probability that the Labadie plant will actually benefit from greenhouse gas regulation?

A. Yes, that's correct, because what we included in your assumptions was that under those 85 percent of scenarios where there was not explicit price on carbon dioxide emissions, that the regulations would result in anywhere from 80 to 120 gigawatts of retirement of the existing 300-plus gigawatts of coal generation in the U.S. and that, in doing so, that would reduce obviously the supply available to meet load and thus alter the supply/demand balance and result in an uplift in power prices.

(Transcript p. 1938, line 8, through p. 1939, line 2)

3. Exhibit 65HC was offered to illustrate points Mr. Michels made in response to Sierra Club's questions: *i.e.*, the 85 percent probability the Labadie unit will benefit from greenhouse gas

regulations by remaining in service for several more years, which the Company included in its IRP filing, is based on the assumption 80 to 120 gigawatts of less cost-efficient coal-fired electric generating units will close before Labadie would need to close. This is clear from Mr. Michels' description of the exhibit:

THE WITNESS: What this chart shows – and I can talk to it without getting into the highly confidential information – is the production costs for all of the coal-fired generators on the United States. Now, the scale of the chart doesn't capture all of the coal generation. There's over 300 gigawatts of coal generation. This cuts it off at 250 gigawatts.

But what it shows is that the production costs for Labadie are among the lowest of all the coal generators in the United States.

(Transcript, p. 1951, line 25, through p. 1952, line 10)

4. Because Exhibit 65HC and Mr. Michels' testimony regarding that exhibit directly address points raised by Sierra Club's counsel during cross-examination, both the exhibit and testimony related to the exhibit are within the scope of proper redirect examination. Therefore, Sierra Club's objection is without merit and should be denied.

WHEREFORE, for the reasons stated above, Sierra Club's objection should be denied, and Exhibit 65HC and testimony related to that exhibit should be received into evidence.

Respectfully submitted,

BRYDON, SWEARENGEN & ENGLAND P.C.

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**ATTORNEYS FOR UNION ELECTRIC COMPANY
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CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the above and foregoing document was sent via electronic mail on this 18th day of March, 2015, to all parties of record in Case No. ER-2014-0258.

/s/ L. Russell Mitten