

has updated the Report, included with this pleading, to include a new Exhibit 7 containing the requested information. Additionally, Ameren Missouri has included the following sentence in Section (8)(A)1J of Report: “See Exhibit 7 for Customer Generator Resource list.”

5. Second, Ameren Missouri inadvertently omitted Section (8)(A)1O and Section (8)(A)1P from its Report. In the Supplemental Report provided with this pleading, Ameren Missouri has included both of these sections, as well as responses to each.

6. Ameren Missouri asks that the Commission accept this corrected Report in place of the Report originally submitted on April 15, 2016.

B. SREC Reallocation

7. In order to reallocate SRECs across NARR accounts in a manner that provides greater transparency as suggested by Staff, Ameren Missouri must make positive entries of SRECs in certain NARR accounts and negative entries of SRECs in other NARR accounts for vintage year 2015.

8. In the fall of 2015, Ameren Missouri reconciled its records related to Lump Sum SRECs associated with Rider SP-Solar Renewable Energy Credit Purchase (“Rider SP”) and Rider SR-Solar Rebate (“Rider SR”). Through that reconciliation, Ameren Missouri identified a net increase in available SRECs for all vintages from 2012 through 2024, as compared to what it had previously identified for the same vintages. After investigating the matter, Ameren Missouri determined that it incorrectly accounted for certain SRECs. For example:

- Certain SRECs to which the Company had been entitled were not forwarded to the Division of Energy for certification; and
- Certain SRECs were submitted in consecutive years, resulting in inadvertent double counting.

While there were certain other factors impacting Ameren Missouri’s SREC accounting, which have been discussed with Staff, these two were the most significant, accounting for the lack of SREC

certification for 157 projects and double counting of 34 projects, respectively.

9. To account for the net increase in SRECs resulting from the reconciliation, Ameren Missouri recorded the entire net increase in a single NARR reconciliation account - “Ameren Customer Solar<10KW-2015 Reconciliation (GEN2204).” However, Staff has suggested that a better recording would ensure that the SREC adjustments related to the reconciliation effort would be associated with the specific NARR accounts for which the projects were originally certified.

10. Ameren Missouri agreed to undertake this reallocation among accounts for the 2015 vintage year by adjusting the balance of the GEN2204 account as well as the other NARR accounts impacted by the reconciliation as follows:

| NAR ID | Account Description | Sum of 2015 SRECs |
|---------------|----------------------------|--------------------------|
| GEN2204 | Reconciliation Asset | 839.2 |
| GEN337 | 2011 Projects Asset | 13.3 |
| GEN374 | 2012 Projects Asset | 228.6 |
| GEN510 | 2013 Projects Asset | (357.3) |
| GEN1119 | 2014 Projects Asset | (696.7) |
| AGG329 | Customer Metered 10KW+ (2) | (27.1) |
| | Net SREC Adjustment | 0.0 |

Adjusting how the reconciliation results are recorded in the NARR accounts results in a zero net change in the aggregate number of 2015 vintage SRECs recorded in the accounts while more accurately reflecting which projects were impacted by the Ameren Missouri reconciliation. These revisions, unlike the corrections noted in Section B of this pleading, do not specifically appear in the amended Report.

11. After conferring with Staff and the NARR, Ameren Missouri has concluded that its original reconciliation accounting is a reasonable option for the 2013 and 2014 vintage years.

Accordingly, Ameren Missouri submits the adjusted reconciliations for 2015 noted above. Additionally, the Company will make no adjustments to NARR account balances for the 2013 and 2014 vintage years, since those vintage years have already been retired. This means that the 2013 and 2014 NARR account balances will remain aggregated reconciliation results recorded in an NARR reconciliation account. Unfortunately, this also means that the reconciliation results will be recorded differently for vintage years 2013 and 2014 than they will be for 2015 forward. The Company has discussed this result with Staff, and is appreciative of the time and effort Staff has spent in collaborating with Ameren Missouri on potential solutions to this issue.

12. The regulation governing the reporting requirements for the SRECs reads as follows:

(A) The REC or S-REC creation is linked to the associated renewable energy resource. For purposes of retaining RECs or S-RECs, the utility, person, or entity responsible for creation of the REC or S-REC must maintain verifiable records including generator attestation that prove the creation date. The electric utility shall comply with the requirement of this subsection through the registration of the REC in the commission's approved REC tracking system.

4 CSR 240-20.100(3). While Ameren Missouri's proposed revisions will satisfy the last sentence of this regulation section, it is not clear whether NARR registration is sufficient to assure the section's intended level of SREC transparency. Accordingly, to the extent a variance is required to accomplish the revisions to the report to reflect the SRECs in the manner described above, the Company requests such a variance be granted. Ameren Missouri believes there is good cause for a variance pursuant to 4 CSR 240-2.060(4) in this matter because:

- a. Any adjustment to vintage years 2013 and 2014 would provide little, if any, intrinsic value since those SRECs have already been retired (e.g., since these SRECs have already been retired, they cannot be used for any other purpose so greater transparency at this stage would provide little practical benefit);
- b. Different recording of reconciliation results will be limited to these two vintage years;

- c. Vintage years 2015 forward will reflect a higher level of transparency in the reconciliations; and,
- d. Ameren Missouri has discussed this solution with both Staff and NARR, neither of which indicated they would formally object before the Commission to this proposed solution.

13. Ameren Missouri also suggests that it be required to submit timely notice to Staff when the NARR account balance adjustments are completed. Because the requisite adjustments are noted in this pleading, the Company suggests that an additional pleading commemorating the finalization of the NARR account balance adjustments will not be necessary, and that notice to Staff will suffice.

WHEREFORE, Ameren Missouri asks that the Commission accept the attached Supplemental RES Compliance Report for 2015 with the changes noted above, in Section A, in replacement of the RES Compliance Report for 2015 that was filed on April 15, 2016. Additionally, Ameren Missouri requests that it be required to submit timely notice to Staff when the NARR account balance adjustments are completed.

Respectfully Submitted,

/s/ Wendy K. Tatro

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CERTIFICATE OF SERVICE

I HEREBY CERTIFY that I have on this 23rd day of June, 2016 served the foregoing document and its attachment either by electronic mail, or by U. S. Mail, postage prepaid addressed to all parties of record.

/s/ Wendy K. Tatro
Wendy K. Tatro