

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

In the Matter of the Renewable Energy Standard)
Compliance Report 2013 and Renewable Energy) **Case No. EO-2014-0291**
Standard Compliance Plan 2014-2016)

MOTION TO RECLASSIFY INFORMATION AS PUBLIC

COMES NOW Earth Island Institute d/b/a Renew Missouri (“Renew Missouri”), by and through the undersigned counsel, and pursuant to 4 CSR 240-2.135(12) hereby submits this motion to reclassify as public certain information in this case, and in support of its Motion states as follows:

1. On April 15, 2014, Union Electric Company d/b/a Ameren Missouri (“Ameren Missouri”) filed its *2014-2016 RES Compliance Plan*, as required by 4 CSR 240-20.100(7). On pg. 17 of the Plan, Ameren Missouri designated as “highly confidential” a table detailing the Company’s proposed compliance with Missouri’s Renewable Energy Standard (“RES”) over the next ten (10) years, including the estimated cost impacts of such compliance.

2. The Commission’s rule implementing the RES specifically require that investor-owned utilities submit “a detailed explanation of the calculation of the RES retail impact limit calculated in accordance with Section (5) of this rule. This explanation should include the pertinent information for the planning interval which is included in the RES compliance plan.” 4 CSR 240-20.100(7)(B)1.F.

3. Renew Missouri believes that the public has an interest in having access to documents showing how investor-owned utilities are proposing to comply with the RES, which Missouri voters overwhelmingly voted to enact in November, 2008. Similarly, the public has an interest in knowing how rates are going to be affected by utilities’ proposed compliance.

4. Moreover, the information designated as “highly confidential” could have a substantial effect on the proceedings in Case No. EW-2014-0092, the Commission’s workshop docket to revise the RES rules to implement House Bill 142 (2013). Disclosure of the information could assist interested parties’ ability to provide input on, among other things, how the calculation required by Section (5)(B) should be performed.

5. Ameren Missouri has provided no justification for why the table at pg. 17 should be designated “highly confidential” as opposed to “public.” In the absence of such justification, the Commission should order that Ameren Missouri refile its *2014-2016 RES Compliance Plan* and designate the table at pg. 17 as “public.”

6. Rule 4 CSR 240-2.135(12)(A) provides the party asserting that the information is proprietary or highly confidential with ten (10) days to file a pleading establishing the specific nature of the information that it seeks to protect and establishing the harm that may occur if that information is disclosed to the public. Rule 4 CSR 240-2.135(B) allows the Commission to order that the designated information be treated as public information if the asserting party fails to respond according to subsection (12)(A).

WHEREFORE, pursuant to 4 CSR 240-2.135(12), Renew Missouri requests that the Commission grant this Motion to Reclassify Information as Public, and – if Ameren Missouri fails to respond by Friday, May 9, 2014 – order that the designated information at pg. 17 of its 2014-2016 RES Compliance Plan be treated as “public” rather than “highly confidential.”

Respectfully submitted,

/s/ Andrew J. Linhares
Andrew J. Linhares, # 63973
Renew Missouri
910 E. Broadway, Ste. 205
Columbia, MO 65201
andrew@renewmo.org

(314) 471-9973 (T)
(314) 558-8450 (F)

ATTORNEY FOR EARTH ISLAND
INSTITUTE d/b/a RENEW MISSOURI

CERTIFICATE OF SERVICE

I do hereby certify that a true and correct copy of the foregoing document has been emailed this 29th day of April, 2014 to all counsel of record in this proceeding.

/s/ Andrew J. Linhares