

MEMORANDUM

TO: Missouri Public Service Commission Case File
Case No. EO-2015-0267, Ameren Missouri Renewable Energy Standard Compliance
Plan for Calendar Years 2015, 2016, and 2017

FROM: Claire M. Eubanks, PE, Energy Unit – Engineering Analysis

/s/ Natelle Dietrich / 5/29/15
Director - Tariff, Safety, Economic
And Engineering Analysis / Date

/s/ Nicole Mers / 5/29/15
Staff Counsel's Office / Date

SUBJECT: Staff Report on Ameren Missouri's 2015 Renewable Energy Standard Compliance Plan

DATE: May 29, 2015

CONCLUSION

The Staff has reviewed Union Electric Company d/b/a Ameren Missouri's ("Ameren Missouri" or "Company") *Renewable Energy Standard Compliance Plan 2015-2017* ("Plan"). Based on Staff's review, the Company has met the minimum requirements for the plan.

OVERVIEW

On April 15, 2015, the Company filed its *Plan* for calendar years 2015 through 2017, in accordance with Rule 4 CSR 240-20.100(7), Electric Utility Renewable Energy Standard Requirements, Annual RES Compliance Report and RES Compliance Plan. This rule states, in part, "Each electric utility shall file an annual RES compliance plan with the commission. The plan shall be filed no later than April 15 of each year." Subparagraphs 4 CSR 240-20.100(7)(B)1.A. through G. provide the minimum requirements for the plan. Subsection 4 CSR 240-20.100(7)(D) requires that Staff examine the plan and file a report within forty-five (45) days of the filing.

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DISCUSSION

Staff reviewed the Company's Compliance Plan in accordance with the established requirements to verify the Plan contains the information required by rule. The results of this review are detailed below, with appropriate rule subparagraphs A. through G. identified and quoted.

A. "A specific description of the electric utility's planned action to comply with the RES;"

The Company explained its completed and planned actions for compliance with the RES for 2015 through 2017. For non-solar compliance, the Company will utilize renewable energy certificates ("RECs") from the Keokuk hydroelectric generating station, the Maryland Heights Renewable Energy Center ("MHREC") which utilizes landfill gas, and a purchased power agreement ("PPA") from the Pioneer Prairie II Wind Farm ("Pioneer Prairie II").

For solar compliance, the Company will utilize solar renewable energy credits ("S-RECs") from net-metered customers, the solar generation facility installed at the Company headquarters, and the recently completed utility-scale solar facility O'Fallon Renewable Energy Center ("OREC"). The MHREC, the net-metered systems, and Company-owned solar generation will qualify for the Missouri in-state one and twenty-five hundredths (1.25) credit.¹

The Company plans to complete an additional 15 MW utility-scale solar facility in 2016. The planned project is not necessary for compliance in the 2015-2017 timeframe but completion in 2016 allows Ameren to take advantage of investment tax credits.²

B. "A list of executed contracts to purchase RECs (whether or not bundled with energy), including type of renewable energy resource, expected amount of energy to be delivered, and contract duration and terms;"

¹ 393.1030.1., RSMo; Rule 4 CSR 240-20.100(3)(G)

² Response to Staff Data Request 11

Table 1 on page 19 of the *Plan* includes a list of executed contracts, the type of renewable energy, the expected energy to be delivered and contract duration and terms. The Company has a 15-year PPA for energy and RECs from Pioneer Prairie II, beginning in 2009. The Company has Standard Offer Contracts (“SOCs”) with a portion of its net-metered customers. Please note there is a typographical error on page 10 of the *Plan*; The Company executed 82 SOCs prior to passage of HB 142.³ Additionally, S-RECs are acquired from customers as a condition of receiving a rebate due to the passage of HB 142. ** _____

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C. “The projected total retail electric sales for each year;”

The Company provided values for its projected retail electric sales. The values appear to be reasonable estimates.

D. “Any differences, as a result of RES compliance, from the utility’s preferred resource plan as described in the most recent electric utility resource plan filed with the commission in accordance with 4 CSR 240-22, Electric Utility Resource Planning;”

The Company submitted its most recent triennial compliance filing on October 1, 2014. The *Plan* is similar to the October 1, 2014 preferred resource plan in regard to renewable resource additions as a result of RES compliance. ** _____

³ Response to Staff Data Request 9

_____ ** The preferred resource plan includes additional renewable resources beyond the additions for RES compliance as limited by the RRI calculation.

E. “A detailed analysis providing information necessary to verify that the RES compliance plan is the least cost, prudent methodology to achieve compliance with the RES;”

The Company provided the actual and projected costs of capital projects and O&M expenses related to RES compliance in Table 3, located on page 21 of the *Plan*. Staff reserves the right to comment on whether the *Plan* is the least cost, prudent method to comply with the RES when rate recovery is requested.

F. “A detailed explanation of the calculation of the RES retail rate 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.”

The Company provided a description of the Retail Rate Impact calculation on page 16 of the *Plan* and provided Staff the associated work papers in response to Staff Data Request 1. Additionally, the Company included a carryover provision as agreed to in the non-unanimous stipulation and agreement in Case No. ET-2014-0085.

G. “Verification that the utility has met the requirements for not causing undue adverse air, water, or land use impacts pursuant to subsection 393.1030.4. RSMo, and the regulations of the Department of Natural Resources.”

The Company states that the generating facilities utilized to meet the RES requirements have been certified by the Missouri Department of Natural Resources.⁴

⁴ Rule 10 CSR 140-8.010(4) – now the Missouri Department of Economic Development – Division of Energy.

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

In the Matter of Ameren Missouri's)
 Submission of Its 2015-2017 RES)
 Compliance Plan and Its 2014)
 Compliance Report)

File No. EO-2015-0267

AFFIDAVIT OF CLAIRE M. EUBANKS

STATE OF MISSOURI)
) ss
 COUNTY OF COLE)

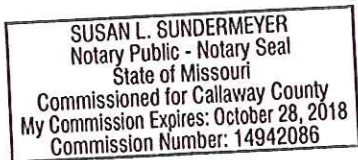
COMES NOW Claire M. Eubanks and on her oath declares that she is of sound mind and lawful age; that she contributed to the attached Staff Report in memorandum form; and that the same is true and correct according to her best knowledge and belief.


Further the Affiant sayeth not.



 Claire M. Eubanks

Subscribed and sworn to before me this 29th day of May, 2015.





 Notary Public