

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

In the Matter of Ameren Missouri's 2013)	
Integrated Resource Plan Annual Update)	File No. EO-2013-0424
Report.)	

AMEREN MISSOURI RESPONSE TO COMMENTS

COMES NOW, Union Electric Company, d/b/a Ameren Missouri (Ameren Missouri or Company), and states as follows:

1. Ameren Missouri submitted its 2013 Annual Update report on March 15, 2013 and followed up with a stakeholder meeting on April 5, 2013. The Company submitted its Summary Report on April 15, 2013 and various parties submitted comments on the annual update on May 15, 2013.
2. Comments are not required to be filed by the parties and the Missouri Public Service Commission Staff (Staff) and the Office of the Public Counsel (OPC) elected not to file any comments on the Company's annual update.
3. While the Missouri Department of Natural Resources complimented Ameren Missouri's annual update, the Sierra Club and the Natural Resources Defense Council (NRDC) raised issues, many of which were centered around their desire for Ameren Missouri to select a different preferred plan.
4. The Missouri Public Service Commission (Commission) did not design the annual update process to be a complete re-work of the utility's triennial Integrated Resource Planning (IRP) process. The Commission's rules, at 4 CSR 240-22.080(3), govern the annual update and state it is designed to "ensure that members of the stakeholder group have the opportunity to provide input and to stay informed regarding" certain enumerated factors. During the special

contemporary issues process, the Commission held that "the requirement to examine special contemporary issues should not expand the limited annual update report into something more closely resembling a triennial compliance report."¹

5. Ameren Missouri will not take the time to answer each assertion set forth by the Sierra Club and NRDC at this point. These arguments are best left to the triennial filing, which will be filed again in October of next year. Ameren Missouri's annual update filing and stakeholder meeting fulfilled the requirements of 4 CSR 240-22.080(3) as it updated stakeholders on the Company's current preferred plan, the status of the identified critical uncertain factors, the Company's progress in implementing its resource acquisition strategy, the analysis required by the Commission's special contemporary issues order and progress on any deficiencies or concerns identified in the Company's previous triennial IRP filing. There is nothing more required in this docket and any attempt to use this update process as a mechanism to litigate, again, issues the Commission has already resolved or to pre-judge issues that are best dealt with in the Company's 2014 IRP filing should be rejected by the Commission.

6. The filings by both the Sierra Club and NRDC seem to recognize that their critiques seek information beyond the analysis Ameren Missouri is required to perform for the annual update, as the relief requested by both parties was merely to require Ameren Missouri to address their concerns in the Company's 2014 triennial filing. All of the issues raised are issues that will be addressed in Ameren Missouri's 2014 IRP filing, whether or not they were raised by a party in this case. Accordingly, the Commission should accept the comments filed and close the case, as there is no need for further action.

¹ EO-2013-0104, Order Establishing Special Contemporary Resource Planning Issues, October 31, 2012, p. 2.

WHEREFORE, Ameren Missouri asks the Missouri Public Service Commission to accept this pleading and to close this case without further action.

Respectfully submitted,

UNION ELECTRIC COMPANY
d/b/a Ameren Missouri,

/s/ *Wendy K. Tatro*

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CERTIFICATE OF SERVICE

The undersigned hereby certifies that a true and correct copy of the foregoing Notice was served on the parties in this case via electronic mail (e-mail) on this 28th day of May, 2013.

/s/ Wendy K. Tatro

Wendy K. Tatro