

BEFORE THE PUBLIC SERVICE COMMISSION OF THE STATE OF MISSOURI

In The Matter of a Determination of Special)	
Contemporary Resource Planning Issues to be)	
Addressed by Ameren Missouri in its Next)	File No. EO-2012-0039
Triennial Compliance Filing or Next Annual)	
Update Report)	

LIST OF SUGGESTED SPECIAL CONTEMPORARY ISSUES OF NRDC et al.

The Natural Resources Defense Council, Sierra Club, Renew Missouri, Mid-Missouri Peaceworks, and Great Rivers Environmental Law Center , pursuant to 4 CSR 240-22.080(4), suggest the following as special contemporary issues for future consideration and analysis by Ameren Missouri.

1. Improving the integration of wind on Ameren's system;
2. Tracking the costs of wind and solar generation, including reporting and analysis of market data on the \$/MWh cost of wind and solar in the region;
3. The prospects for continued stability of natural gas prices, especially in light of unconventional gas supplies;
4. Assessing the increasing cost of coal, including increasing transportation costs, increasing exports, increasing overburden in existing coal fields, and increasing demand for low-sulfur coal;
5. Analyzing the future capital and operating costs faced by each Ameren coal-fired generating unit in order to comply with existing and pending environmental standards, including:
 - Clean Air Act New Source Review provisions

- 1-hour Sulfur Dioxide National Ambient Air Quality Standard, 75 Fed. Reg. 35520
- Cross State Air Pollution Rule, which was finalized by U.S. EPA on July 6, 2011
- Clean Air Interstate Rule
- Utility Boiler MACT, released by U.S. EPA in draft form on May 3, 2011, 76 Fed. Reg. 24976, and which U.S. EPA is under a court order requiring that the rule be finalized in November 2011
- Clean Water Act 316(b) Cooling Water Intake Standards, 33 U.S.C. § 1326(b).
- Clean Water Act Steam Electric Effluent Limitation Guidelines
- Clean Air Act Section 111 Greenhouse Gas New Source Performance Standards
- Regional Haze Plan Revision
- Coal ash rules

6. Identifying any transmission grid upgrades and additions needed to avoid transmission grid reliability, stability, or voltage support impacts from the retirement of any existing Ameren coal-fired generating unit;

7. Assessing the condition of each of Ameren's existing coal-fired generating units and using the results of such assessments and experience throughout the industry to determine reasonably expected remaining lives for each unit;

8. Evaluating the annual capital and operating and maintenance costs that would be needed to keep each Ameren coal-fired unit operating for the rest of the unit's reasonably expected remaining life, and assessing the reasonably expected performance of each unit as it ages;

9. Comparing the capital, environmental, operating and maintenance, and fuel costs for each of Ameren's coal-fired generating units to the cost of serving the same energy needs through other demand side and supply side resources

10. Study of a future test year, and other ways to deal with "regulatory lag;"

11. Identifying and evaluating emerging DSM technologies that have the potential to become cost-effective within the planning horizon;

12. Surveying programs, practices and mechanisms for DSM cost-recovery and incentives from around the nation, with a view to identifying best practices, including:

- Performance incentives;
- Use of balancing accounts for cost-recovery;
- Ways of accurately estimating or imputing energy savings due to DSM programs before EM&V;
- Decoupling and other ways to remove the throughput disincentive.

Respectfully submitted,

/s/ Henry B. Robertson

Henry B. Robertson
Great Rivers Environmental Law Center
705 Olive Street, Ste. 614
St. Louis, MO 63101
(314) 231-4181
hrobertson@greatriverslaw.org