

In the Matter of Ameren Missouri's)
2012 Renewable Energy Compliance Report) File No. EO-2013-0462

**COMMENTS OF RENEW MISSOURI ON AMEREN MISSOURI'S
2012 RENEWABLE ENERGY STANDARD COMPLIANCE REPORT**

Pursuant to 4 CSR 240-20.100(7)E), Earth Island Institute d/b/a Renew Missouri (“Renew Missouri”) offers the following comments on Union Electric Company d/b/a Ameren Missouri’s (“Ameren Missouri”) 2012 Renewable Energy Standard (“RES”) Compliance Report:

1. Pursuant to 4 CSR 240-20.100(7)(A), Ameren Missouri filed its 2012 RES Compliance Report on April 15, 2013 in the above-styled case.
2. On April 16, the Commission issued its Order setting a comment deadline of May 30, 2013.
3. On May 22, 2013, Ameren Missouri filed additional information pertaining to its 2012 RES Compliance Report.
4. In Case No. EO-2012-0351 regarding Ameren Missouri's 2011 RES Compliance Report, the Commission issued its August 15, 2012 Notice, indicating that the Commission would not take action on comments and would only address the issue of Ameren Missouri's non-compliance in the context of a Formal Complaint:

The Commission's regulation does not specify what, if any, action the Commission is to take regarding Ameren Missouri's [2011] RES compliance report and [2012-2014] plan and any alleged deficiencies in that report and plan, except to allow the Commission to "establish a procedural schedule if necessary. [4 CSR 240-20.100(7)F)] After considering the submitted comments, the Commission concludes that no further order from the Commission is appropriate at this time.... If the organizations that submitted comments, or anyone else, wants to further pursue their contention that Ameren Missouri has failed to comply with the requirements of the renewable energy statute or the Commission's implementing regulations, they may do so by filing a complaint

pursuant to Section 4 CSR 240-20.100(8)(A) and the statutes and regulations governing complaints before the Commission.

5. Accordingly, Renew Missouri files these comments today simply to reiterate the concerns it has raised in other dockets relating to Ameren Missouri's annual RES Compliance Plans and RES Compliance Reports (EO-2011-0275; EO-2012-0351) and to restate that Ameren Missouri continues to be non-compliant with the RES statute for the reasons stated in previous comments.

6. In addition, on January 30, 2013, Renew Missouri and a number of other interested parties filed a Formal Complaint against Ameren Missouri for its failure to comply with the Missouri RES for calendar year 2011. That complaint is currently before the Commission in Case No. EC-2013-0377, et al. The issues raised in Renew Missouri's previous comments are thoroughly aired in the Complaint. Furthermore, all substantive reasons behind Ameren Missouri's non-compliance in 2011 remain the same for calendar year 2012.

Respectfully Submitted,

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