

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

In the Matter of Ameren Missouri's Request for a)
Variance from the Triennial Filing Date Requirement) EO-2013-
Found in 4 CSR 240-22.080)

REQUEST FOR VARIANCE FROM 4 CSR 240-22.080(1)(C)

COMES NOW, Union Electric Company, d/b/a Ameren Missouri (Ameren Missouri or Company), and for its *Request for Variance from 4 CSR 240-22.080(1)(C) (Request)*, states as follows:

1. Pursuant to the Missouri Public Service Commission's (Commission) Electric Utility Resource Planning rules, Ameren Missouri is required to file its next triennial compliance filing on April 1, 2014.

2. Ameren Missouri requests the Commission grant the Company a variance from this requirement and allow it to make its next triennial compliance filing on or before October 1, 2014.

Rationale for Request

3. Given the amount of activity which must occur between now and when the Company makes its next triennial compliance filing, Ameren Missouri has determined that there is not enough time to allow for the depth and quality of work required. Accordingly, the Company files this request for additional time in order to make its triennial compliance filing.

4. As part of the *Unanimous Stipulation and Agreement Resolving Ameren Missouri's MEEIA Filing (Stipulation)*, in the Company's 2012 Missouri Energy Efficiency Investment Act (MEEIA) filing,¹ Ameren Missouri agreed to perform a new Demand-Side

¹ Case No. EO-2012-0142

Management (DSM) market potential study meeting the requirements of 4 CSR 240-3.164(2)(A), including a comprehensive analysis of demand response programs. These results will be used to inform the preparation of the Company's 2014 Chapter 22 triennial compliance filing.² The *Stipulation* was filed on July 5, 2012. Ameren Missouri issued a request for proposal ("RFP") to potential bidders six days later on July 11, 2012.

5. Bids pursuant to the RFP were received on August 3, 2012. In reviewing the bids, Ameren Missouri quickly determined that vendor availability was such that the scope of work required by the RFP could not be completed within a timeframe that would support the completion of Ameren Missouri's 2014 triennial electric resource plan compliance filing by April 1, 2014. The Company convened a stakeholder meeting on August 17, 2012 to review the bids and discuss the implications of the bidders' responses to the RFP. Based in part on stakeholder feedback, Ameren Missouri explored options for rebidding the RFP or working with bidders to revise the submitted responses. Based on the Company's review of the options and further discussions with stakeholders, the Company proceeded with negotiations with one of the bidders, EnerNoc, Inc. The negotiations proceeded through the month of September, resulting in the execution of an agreement on October 10, 2012.

6. Ameren Missouri then worked with EnerNoc to develop a detailed project plan and schedule. The project plan reflects a scope of work that is significantly expanded when compared to that included in the Company's previous DSM market potential study. The additions include the estimation of energy and demand savings potential for distributed generation and combined heat and power, expanded evaluation of potential of demand response programs, and evaluation of rate structures to encourage more efficient use of energy. The schedule calls for completion of the market potential study by October 31, 2013, approximately

² Ameren Missouri's last DSM market potential study was completed in January 2010.

one year after project start. For comparison, Ameren Missouri's 2010 potential study took approximately 14 months to complete and represented a significantly smaller scope of work. The Company expects to gain schedule efficiencies as a result of lessons learned in the prior study and relationships built with EnerNoc personnel during that study. The ongoing DSM market potential study is expected to cost approximately \$1.0 million.

7. Once the market potential study is complete, Ameren Missouri's team will develop data for use in the Chapter 22 integrated resource analysis and risk analysis. Data development is expected to be complete by December 31, 2013. Based on the timeline from Ameren Missouri's 2011 Chapter 22 triennial compliance filing, completion of integrated resource analysis and risk analysis, strategy selection and reporting will take approximately nine months. Accordingly, Ameren Missouri expects to be in a position to submit its 2014 Chapter 22 triennial compliance filing on October 1, 2014.

8. The Company has developed a timeline covering the market potential study, Chapter 22 analysis and an anticipated MEEIA filing³ to be made in late 2014 to ensure a smooth transition from the Company's 2013-2015 MEEIA plan to its 2016-2018 MEEIA plan. A summarized timeline is shown in Attachment A to this pleading. Prior to making this filing, the timeline was reviewed with stakeholders, and no significant concerns were raised. By delaying the submission of its 2014 Chapter 22 triennial compliance filing, Ameren Missouri will be able to ensure that its subsequent MEEIA filing is based on the same information evaluated in its 2014 Chapter 22 triennial compliance filing and thus ensure the analytical consistency needed to support related resource decisions. Absent such a delay in the IRP filing date, the Company would have no choice but to proceed with data from its 2010 DSM market

³ MEEIA filing will comply with 4 CSR 240-3.163, 4 CSR 240-3.164, 4 CSR 240-20.093 and 4 CSR 240-20.094.

potential study for the IRP analysis while basing the subsequent MEEIA filing on the new DSM market potential study results.

9. Accurate evaluation of the potential for demand-side resources is a critical component of electric utility resource planning and, for that reason, the Company believes that it is important that its 2014 Chapter 22 triennial compliance filing integrated resource analysis, risk analysis and strategy selection and its 2016-2018 MEEIA plan be as consistent as possible. To that end, the Company respectfully requests that the Commission order that the Company's 2014 Chapter 22 triennial compliance filing be made by October 1, 2014.

Interpretation of 4 CSR 240-22.080(12)

10. To provide assurance to the Company's stakeholder group regarding potential significant resource decisions, Ameren Missouri agrees to the following clarifying language with respect to the requirements in the Chapter 22 electric resource planning rules pertaining to notifications to the Commission of changes in the Company's preferred resource plan:

Ameren Missouri agrees that the phrase "materially inconsistent with the preferred resource plan" that appears in 4 CSR 240-22.080(12) shall be interpreted to include: (1) any additional investment in baseload generation capacity during the 20 year planning horizon where the capacity is greater than 25 MWs or (2) the addition of one or more scrubbers to any of its current coal-fired generation facilities where the projected in service date for the scrubber(s) would be prior to April 1, 2017.

WHEREFORE, Ameren Missouri asks the Missouri Public Service Commission to grant it a variance from the filing date requirement of 4 CSR 240-22.080(1)(C) and allow the Company until October 1, 2014 to make its triennial compliance filing.

Respectfully submitted,

/s/ Wendy K. Tatro

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CERTIFICATE OF SERVICE

I do hereby certify that a true and correct copy of the foregoing document has been hand-delivered, transmitted by e-mail or mailed, First Class, postage prepaid, this 27th day of November, 2012, to all parties in the Company's previous Triennial Compliance Filing docket, File No. EO-2011-0271.

/s/ Wendy K. Tatro

**Overview of Electric Utility Resource Planning
And Missouri Energy Efficiency Investment Act Activities for Ameren Missouri**

	2009	2010	2011	2012	2013	2014	2015	2016
DSM Potential Study		Jan			Aug			
Chapter 22 Triennial Compliance Filing			Feb					
MEEIA Rules Effective			May					
Revised Chapter 22 Rules Effective			Jun					
Chapter 22 Special Contemporary Issues			Oct	Oct	Oct	Oct	Oct	Oct
Chapter 22 Annual Update Filings				Apr	Apr		Apr	Apr
Chapter 22 Triennial Compliance Filing						Oct		
MEEIA Filing			Jan			Dec		
MEEIA Order				Aug			Apr	
DSM Programs	Initial DSM Programs			"Bridge" Programs	Cycle 1 MEEIA Programs			Cycle 2
	2009	2010	2011	2012	2013	2014	2015	2016