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

In the Matter of the Renewable Energy Standard Compliance Report 2013 and Renewable Energy Standard Compliance Plan 2014-2016.

) File No. EO-2014-0291

## **RESPONSE TO COMMENTS**

**COMES NOW** Union Electric Company, d/b/a Ameren Missouri (Ameren Missouri or the Company) and files the following *Response to Comments*:

1. Ameren Missouri filed its 2014-2016 RES Compliance Plan (RES Plan) and its

2013 RES Compliance Report (RES Report) on April 15, 2014.

2. Since that date, various parties have filed comments on both the *RES Plan* and the *RES Report* pursuant to the process for filing comments under the Missouri Public Service Commission's (Commission) RES rules.

3. The Staff of the Commission (Staff) filed a report indicating that it found no deficiencies with either the *RES Plan* or the *RES Report*.

4. The Missouri Division of Energy (DE) filed comments confirming that it had certified all renewable energy generation facilities referenced in the *RES Report*. DE also provided some suggestions on alternative ways to craft the retail rate impact (RRI) calculation.

5. The Missouri Solar Energy Industries Association (MOSEIA) filed comments indicating that it did not believe Ameren Missouri had correctly performed the RRI calculation.

6. Earth Island Institute d/b/a Renew Missouri (Renew Missouri) filed comments, offering up issues that have previously been raised before the Commission (the classification of Keokuk as a renewable energy resource; the retirement of Renewable Energy Credits that are unassociated with energy and disagreement with how the RRI is calculated) as well as asserting

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that Ameren Missouri has violated the Stipulation and Agreement approved by the Commission in File No. ET-2014-0085.

7. Ameren Missouri will not attempt to address the issues raised by various parties in this case, most of which the Company has addressed in previous cases and some of which have been rejected by the Commission. In multiple previous RES Report and RES Plan cases, the Commission has determined it would not resolve these disagreements in RES Report and RES Plan dockets and, instead, has stated these issues would be addressed if and when a complaint is filed on one of these issues<sup>1</sup>. Consequently, while Ameren Missouri does not agree with Renew Missouri's assertions or DE's alternative RRI methodology, Ameren Missouri is not providing a full response to such issues here.

**WHEREFORE**, Ameren Missouri requests the Missouri Public Service Commission determine that no further order is appropriate at this time and close this case.

Respectfully submitted,

UNION ELECTRIC COMPANY d/b/a Ameren Missouri

By <u>Wendy K. Tatro</u> Wendy K. Tatro, #60261 Director and Assistant General Counsel Thomas M. Byrne #33340 Director and Assistant General Counsel 1901 Chouteau Avenue P.O. Box 66149 (MC 1310) St. Louis, MO 63166-6149 (314) 554-3484 (314) 554-4014 (FAX) AmerenMOService@ameren.com

## ATTORNEYS FOR UNION ELECTRIC COMPANY d/b/a AMEREN MISSOURI

<sup>&</sup>lt;sup>1</sup> File No. EO-2013-0503, Notice Regarding Ameren Missouri's 2013-2015 Compliance Plan; File No. EO-2012-0351, Notice Regarding Ameren Missouri's 2011 Compliance Report and 2013-2014 Compliance Plan.

## **CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that I have, on this 9<sup>th</sup> day of July, 2014, served the foregoing

either by electronic means, or by U. S. Mail, postage prepaid addressed to all parties of record.

Wendy K. Tatro

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