

**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. EE-2018-0040
Triennial Compliance Filing or Next Annual)	
Update Report.)	

AMEREN MISSOURI’S RESPONSE TO APPLICATIONS TO INTERVENE

COMES NOW Union Electric Company d/b/a Ameren Missouri (Ameren Missouri or Company), and for its response to the Missouri Industrial Energy Consumers’ (MIEC) and the Missouri Department of Economic Development – Division of Energy’s (DE) Applications to Intervene filed on August 9, 2017 and August 10, 2017, respectfully, states as follows:

1. Ameren Missouri initiated this docket by seeking waivers of the provisions of the Commission’s Integrated Resource Planning (IRP) rules which require annual Special Contemporary Issues and Annual Update proceedings. Ameren Missouri’s justification for those waivers was, in summary, that it will be filing its triennial IRP by September 29, 2017, that its triennial IRP filing docket will almost certainly not be resolved by the time any Special Contemporary Issues would be dealt with in an Annual Update filing and workshop that would ordinarily occur in March/April, 2018. Consequently, Ameren Missouri’s waiver motion states, there is no purpose to be served by having parties suggest Special Contemporary Issues, having Ameren Missouri respond, or having such issues be the subject of an Annual Report/Update process in early 2018. Ameren Missouri also sought an expedited order on its requests for waivers so that parties need not make any filings related to Special Contemporary Issues, as would have otherwise been required by September 15, 2017, under the Commission’s rules.

2. On August 3, 2017 (the day after Ameren Missouri initiated this docket) the Commission issued an order setting an intervention deadline of August 10, 2017, which likely prompted MIEC and DE to file their Applications to Intervene.

3. MIEC's and DE's intervention applications are unnecessary, making it unnecessary to issue an order granting MIEC's or DE's intervention. Under 4 CSR 240-22.080(4) (that is, if the Commission does not waive it as requested in this docket), all parties to the Company's last triennial IRP filing are authorized to file suggested contemporary issues for the Commission to consider; in effect, such persons or entities are automatically "parties" to the special contemporary issues docket. MIEC and DE were parties to Ameren Missouri's last triennial IRP docket. See File No. EO-2015-0084, EFIS Item No. 18 (the Commission's order granting MIEC's and DE's intervention application in that docket). Consequently, if the waivers are not granted, MIEC and DE can make the filings provided for by 4 CSR 240-22.080(4)(A).¹

4. If, however, the Commission grants the requested waivers, as the Company urges it to do for the reasons indicated in the motion that initiated this docket, there will be no Special Contemporary Issues docket in 2017 and no Annual Report filed in March 2018. In that case, there is nothing for MIEC or DE (or any other party²) to file respecting Special Contemporary Issues or an Annual Report; instead, parties will address resource planning issues in the triennial IRP docket.

WHEREFORE, Ameren Missouri respectfully renews its request for the waivers outlined in its August 2, 2017, filing, and requests the Commission deny MIEC's and DR's Applications to Intervene, and the Application to Intervene of MIECG, because they are unnecessary.

¹ Ameren Missouri would not oppose MIEC's or DE's right to make such a filing if the waivers are not granted. MIEC and DE would also be free to file Stakeholder comments on any Annual Report that would be filed under 4 CSR 240-22.080(3)(D), if the waivers are not granted and such a report were to be filed.

² Consequently, if the Company's waiver requests are granted, it would also be unnecessary to grant the intervention application filed by the Missouri Energy Consumer's Group (MECG).

Respectfully submitted,

/s/ James B. Lowery

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CERTIFICATE OF SERVICE

The undersigned hereby certifies that a true and correct copy of the foregoing Response was served on counsel for the Staff, the Office of the Public Counsel, and for MIEC via electronic mail (e-mail) on this 11th day of August, 2017.

/s/ James B. Lowery
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