

BEFORE THE PUBLIC SERVICE COMMISSION
OF THE STATE OF MISSOURI

In the Matter of Union Electric Company d/b/a)
Ameren Missouri’s Tariff to Increase its)
Revenues for Electric Service) Case No. ER-2014-0258

SIERRA CLUB STATEMENT OF POSITION

Sierra Club, by and through counsel, provides the following Statement of Position, with issues numbered according to the *First Amended Joint List of Issues*¹ filed on February 19, 2015. Sierra Club takes a position on Issues 20.A (Depreciation - Meramec) and 29.A (Labadie ESPs – Rate Base). Sierra Club reserves the right to modify its positions or to take additional positions as the case proceeds.

20. Depreciation

- A. What amount of depreciation expense, including for the Meramec Energy Center retirement, should be included in Ameren Missouri’s revenue requirement?

The Commission should grant Ameren’s full request for a depreciation schedule based on a final Meramec retirement date of 2022. In response to Public Counsel’s concerns, the Commission should also expressly make its approval contingent upon the Company’s commitment to take all appropriate steps toward final closure of the plant on or before December 31, 2022. This would effectively place the burden on the Company to follow through with its Meramec retirement plan or make a future filing if the Company seeks to delay Meramec’s retirement.

¹ See Dkt. No. 381, First Amended Joint List of Issues, List and Order of Witnesses, Order of Cross-Examination, and Order of Opening Statements.

29. Labadie ESPs

A. Should the Company's investment in electrostatic precipitators installed at the Labadie Energy Center be included in the Company's rate base?

No. Sierra Club urges the Commission to deny Ameren's request for rate recovery of depreciation of the Labadie ESPs, as well as any return on this investment, unless or until the Company presents the Commission with an adequate justification for the prudence of these expenditures. In contrast to the Company's analysis, an adequate justification must contain a PVRR analysis that includes an unbiased treatment of possible carbon emissions costs across a full range of probable scenarios and an evaluation of the economics of retiring each Labadie unit individually. Specifically, Ameren's analysis must present an unbiased evaluation of the impacts that possible compliance with U.S. EPA's proposed Clean Power Plan and other current or pending environmental regulatory requirements will have on Ameren's coal-fired generation fleet.

Respectfully submitted,

/s/ Sunil Bector

Sunil Bector
Admitted Pro Hac Vice
Sierra Club

85 Second Street, 2nd Floor

San Francisco, CA 94105

415.977.5759 (phone)

415.977.5793 (fax)

sunil.bector@sierraclub.org

/s/ Thomas Cmar

Thom Cmar
Admitted Pro Hac Vice
Earthjustice

1101 Lake Street, Suite
405B

Oak Park, IL 60301

312.257.9338 (phone)

212.918.1556 (fax)

tcmar@earthjustice.org

/s/ Henry B. Robertson

Henry B. Robertson
Mo. Bar No. 29502
Great Rivers Environmental
Law Center

705 Olive Street, Suite 614

St. Louis, MO 63101

314.231.4181 (phone)

314.231.4184 (fax)

hrobertson@greatriverslaw.org

Attorneys for Sierra Club

CERTIFICATE OF SERVICE

I hereby certify that a true and correct PDF version of the foregoing was filed on EFIS and electronically mailed to all counsel of record on this 19th day of February, 2015.

/s/ Sunil Bector

Sunil Bector