

be submitted for bid. To provide potential contractors and suppliers with a forecast of what level of costs the Company anticipates it will have to pay would effectively set a floor for those costs, ultimately increasing the cost to Ameren Missouri's customers, an outcome that would not be in the public interest. The table also includes a year by year forecast of revenue requirements which could be construed by the financial markets as a forecast of revenue. These forecasts have not otherwise been divulged to the general investment community. This information is not contained in the Company's general disclosures or SEC filings, is uncertain (in that the Company doesn't know if the forecasts will become true or not) and has the possibility to mislead investors. For all of these reasons, the information is appropriately labeled Highly Confidential.

4. Of course, all of the information labeled Highly Confidential is available to the Commission, to the Commission Staff, to the Office of the Public Counsel and to counsel or outside experts working on the case. It is not as if this information is going without review. Indeed, it is scrutinized by multiple parties, including Renew Missouri.

5. Further, there is a great deal of information available to the public in the Compliance Plan. To list a few examples - starting on page six, there is a clear statement that Ameren Missouri intends to comply with the RES using Renewable Energy Credits ("RECs") generated by its Keokuk Hydro-Electric generating station, its Maryland Heights Renewable Energy Center as well as RECs from its contract with the Horizon Pioneer Prairie wind farm. The Compliance Plan goes on to state the location, size and historical generation of each of these RECs sources. On page eight, the Compliance Plan states that Ameren Missouri plans to begin construction of its first utility-scale solar generation project in O'Fallon, Missouri. It also states that the Company is evaluating construction of a second utility-scale solar generation project as early as 2016. Contrary to the tone of Renew Missouri's pleading, there is quite a bit of

information available to the public about how Ameren Missouri "...propose[s] to comply with the RES..." (quoting the objective raised as the basis for Renew Missouri's argument for making this information public).

6. The information on page 17 should be treated as Highly Confidential during this proceeding and treating it in this manner is consistent with the Missouri Public Service Commission's regulations found at 4 CSR 240-2.135(1)(B)(4). This portion of the rule explicitly classifies this type of information as Highly Confidential, as it deals with information relating to services purchased or acquired by the company in providing services to customers.

7. Ameren Missouri requests the Commission accept this response out of time. Work on other cases, especially on File Nos. EC-2014-0223 and EC-2014-0224, has consumed a great deal of time for Ameren Missouri counsel and the date to respond to Renew Missouri's motion was overlooked. Counsel apologizes for this oversight and asks the Commission to allow this response to be accepted even though it is being filed out of time.

WHEREFORE, Ameren Missouri opposes the request filed by Renew Missouri and asks the Missouri Public Service Commission to maintain the Highly Confidential designation of the proposed compliance and estimated cost impacts of such compliance as found on page 17 of its Compliance Plan.

Respectfully submitted,

UNION ELECTRIC COMPANY
d/b/a Ameren Missouri

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**ATTORNEYS FOR UNION ELECTRIC
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CERTIFICATE OF SERVICE

I HEREBY CERTIFY that I have this 13th day of May, 2014, served the foregoing either by electronic means, or by U. S. Mail, postage prepaid addressed to all parties of record.

Wendy K. Tatro

Wendy K. Tatro