

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

In the Matter of the Application of	)	
Union Electric Company d/b/a Ameren Missouri	)	
for Authorization to Manage Sulfur Dioxide Emission	)	Case No. EO-2015-0320
Allowance Inventory.	)	

**AMEREN MISSOURI’S RESPONSE TO STAFF’S RECOMMENDATION**

COMES NOW Union Electric Company d/b/a Ameren Missouri (“Ameren Missouri” or “Company”), and for its Response to Missouri Public Service Commission (“Commission”) Staff’s (“Staff”) Recommendation to Approve Application with Limitations (“Recommendation”) states as follows:

1. On June 2, 2015, the Company filed its Application for Authorization to manage its sulfur dioxide (“SO<sub>2</sub>”) and nitrogen oxide (“NO<sub>x</sub>”) emission allowances inventory.

2. On July 31, 2015, Staff filed its Recommendation in this case. Staff recommended approval of the application, subject to certain conditions.

3. In general, Ameren Missouri has no objection to the conditions proposed by Staff. However, to ensure there is no confusion, Ameren Missouri points to paragraph 5(A) of Staff’s Recommendation, which states:

“All proceeds from the sale of SO<sub>2</sub> and NO<sub>x</sub> emissions allowances issued under CSAPR shall flow through Ameren Missouri’s fuel adjustment clause.”

Ameren Missouri interprets the sentence “all proceeds...shall flow through Ameren Missouri’s fuel adjustment clause” to mean it flows through as other revenues, in that outside of a rate case, 95% of the proceeds will flow through the fuel adjustment clause.

4. With the clarification stated above, the Company has reviewed Staff’s Recommendation and agrees with all of the conditions and limitations contained therein.

**WHEREFORE**, Ameren Missouri respectfully requests that the Commission approve Staff's Recommendation and issue an Order authorizing it to manage its SO<sub>2</sub> and NO<sub>x</sub> allowance inventory as set forth therein.

Respectfully submitted,

UNION ELECTRIC COMPANY,  
d/b/a Ameren Missouri

*/s/ Wendy K. Tatro* \_\_\_\_\_

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**CERTIFICATE OF SERVICE**

I hereby certify that a copy of the foregoing was served via e-mail to the parties of record  
on the 10<sup>th</sup> day of August, 2015.

/s/*Wendy K. Tatro*

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