

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

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

**APPLICATION OF UNION ELECTRIC COMPANY d/b/a AMEREN MISSOURI  
FOR AUTHORIZATION TO MANAGE ITS SULFUR DIOXIDE  
EMISSION AND NITROGEN OXIDE ALLOWANCE INVENTORY**

COMES NOW Union Electric Company d/b/a Ameren Missouri (“Applicant” or “Ameren Missouri” or “Company”), and submits its Application pursuant to 4 CSR 240-2.060(1) for authorization to manage its sulfur dioxide (“SO<sub>2</sub>”) and nitrogen oxide (“NO<sub>x</sub>”) emission allowances inventory. In support of this Application, Ameren Missouri states as follows:

1. Union Electric Company is a Missouri corporation doing business under the fictitious name of Ameren Missouri, in good standing in all respects, with its principal office and place of business located at One Ameren Plaza, 1901 Chouteau Avenue, St. Louis, Missouri 63103. Applicant is engaged in providing electric and gas utility services in portions of Missouri as a public utility under the jurisdiction of the Missouri Public Service Commission (“Commission”). There is already on file with the Commission a certified copy of Applicant’s Articles of Incorporation (See File No. EA-87-105), and Applicant’s Fictitious Name Registrations as filed with the Missouri Secretary of State’s Office (See File Nos. GO-98-486 and EO-2011-0069). Said documents are incorporated herein by reference and made a part hereof for all purposes. A Certificate of Corporate Good Standing for Applicant is attached as Schedule A.

2. Pleadings, notices, orders and other correspondence and communications concerning this Application should be addressed to:

Wendy K. Tatro  
Director and Assistant General Counsel  
Matthew R. Tomc  
Corporate Counsel  
Ameren Missouri  
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and

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3. Other than File No. ER-2014-0258, Ameren Missouri has no pending action or final unsatisfied judgment or decision against it from any state or federal agency or court which involves customer service or rates, which action, judgment, or decision has occurred within three years of the date of this Application.

4. The Company has no overdue annual report or assessment fees.

5. In December of 1998, Ameren Missouri received approval to sell and/or trade its Acid Rain Program (“ARP”) and Clean Air Interstate Rule (“CAIR”) SO<sub>2</sub> emission allowances in File No. EO-98-401. The Company later received permission to sell and/or trade NO<sub>x</sub> allowances. That Order was issued on October 28, 2011, in the same case.

6. As part of the above-referenced case, Ameren Missouri agreed to report, on a quarterly and annual basis, information to the Commission regarding sales and/or trades of its CAIR SO<sub>2</sub> and NO<sub>x</sub> transactions and ARP SO<sub>2</sub> transactions.

7. As of January 1, 2015, CAIR has been replaced by Cross-State Air Pollution Rule (“CSAPR”) while the ARP remains in place.

8. Existing SO<sub>2</sub> emission allowances and future allocations used for compliance under ARP and CAIR cannot be used to comply with CSAPR, and will now be used exclusively for ARP compliance. CAIR NO<sub>x</sub> allowances cannot be used to comply with CSAPR and, accordingly, no longer have value. This means Ameren Missouri will no longer sell or trade these allowances.

9. The U.S. Environmental Protection Agency (“EPA”) will remove existing Union Electric Company NO<sub>x</sub> emission allowances (used for compliance under CAIR) when the EPA’s annual reconciliation period is complete for 2014 CAIR requirements. The annual reconciliation is anticipated to be complete by July 1, 2015.

10. Ameren Missouri requests that the Commission grant the Company authority to sell and/or trade CSAPR SO<sub>2</sub> and NO<sub>x</sub> allowances in 2015 and in subsequent years. Upon approval, Ameren Missouri agrees to file a report, on a quarterly and annual basis, similar to what has been provided for NO<sub>x</sub> allowances under CAIR and for its management of SO<sub>2</sub> and NO<sub>x</sub> emission allowances under CSAPR. An example of this report, updated for CSAPR, is attached to this Application as Schedule B.

11. Ameren Missouri further requests approval to end the reporting requirements applicable to Union Electric Company’s authority to sell and trade NO<sub>x</sub> emission allowances created under CAIR, as ordered by the Commission in File No. EO-98-401. Ameren Missouri has not sold or traded any of these allowances since July 23, 2014 and will not have an opportunity to do so in the future for the reasons set forth above.

**WHEREFORE**, Ameren Missouri respectfully requests an Order from the Missouri Public Service Commission authorizing it to manage its CSAPR SO<sub>2</sub> and NO<sub>x</sub> allowance inventory using any and all available trading structures and to cease the reporting requirements related to CAIR NO<sub>x</sub> allowances, as outlined in this Application.

Respectfully submitted,

UNION ELECTRIC COMPANY,  
d/b/a Ameren Missouri

/s/ Wendy K. Tatro

**Wendy K. Tatro**, # 60261  
Director & Assistant General Counsel  
**Matthew R. Tomc**, #66571  
Corporate Counsel  
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**SMITH LEWIS, LLP**


/s/James B. Lowery

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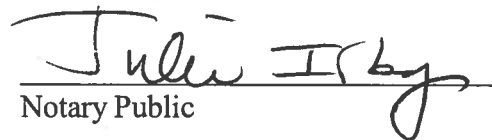
**ATTORNEYS FOR UNION ELECTRIC  
COMPANY d/b/a AMERENMISSOURI**

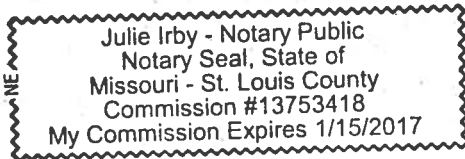
# VERIFICATION

I, Mike Mueller, of lawful age, being duly sworn, deposes and says that I am the Vice President of Energy Management and Trading for Union Electric Company d/b/a Ameren Missouri; that I am duly authorized to and did read the foregoing Application on behalf of Union Electric Company d/b/a Ameren Missouri; that I have knowledge of the facts stated in the foregoing Application; and that said facts are true to the best of my knowledge, information and belief.

  
Mike Mueller

Subscribed and sworn to before me this 2 day of June, 2015.

  
Notary Public



### **CERTIFICATE OF SERVICE**

I hereby certify that a copy of the foregoing was served via e-mail, to the following parties on the 2<sup>nd</sup> day of June, 2015.

Office of the General Counsel  
Missouri Public Service Commission  
Governor Office Building  
200 Madison Street, Suite 100  
Jefferson City, MO 65101  
[staffcounsel@psc.mo.gov](mailto:staffcounsel@psc.mo.gov)

Office of the Public Counsel  
Governor Office Building  
200 Madison Street, Suite 650  
Jefferson City, MO 65101  
[opcservice@ded.mo.gov](mailto:opcservice@ded.mo.gov)

/s/**Wendy K. Tatro**

Wendy K. Tatro

# STATE OF MISSOURI



**Jason Kander**  
**Secretary of State**

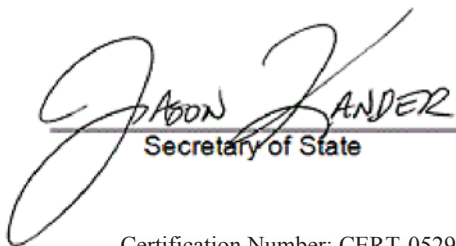
CORPORATION DIVISION  
CERTIFICATE OF GOOD STANDING

I, JASON KANDER, Secretary of State of the State of Missouri, do hereby certify that the records in my office and in my care and custody reveal that

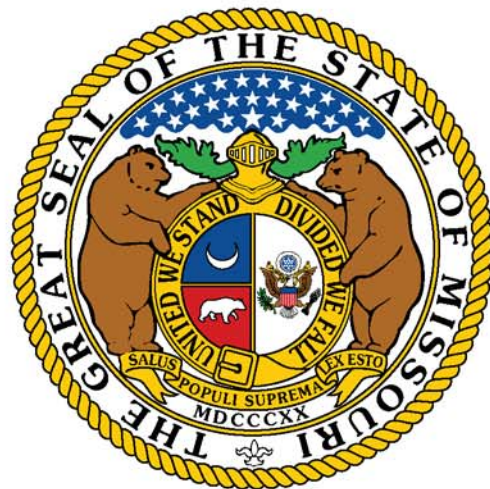
***UNION ELECTRIC COMPANY***  
***00040441***

was created under the laws of this State on the 21st day of November, 1922, and is in good standing, having fully complied with all requirements of this office.

IN TESTIMONY WHEREOF, I hereunto set my hand and cause to be affixed the GREAT SEAL of the State of Missouri. Done at the City of Jefferson, this 29th day of May, 2015.

  
Secretary of State

Certification Number: CERT-05292015-0053



**Quarterly Reporting** *[typically provided within 6 weeks after the end of a quarter]*

1. Type of transaction by individual transaction for each month for the quarter.
2. Total quantity of allowances involved in the transaction.
3. The total quantity and vintage of any allowances received as a result of the transaction, any monetary value received as a result of the transaction, and any expenses (such as brokerage fees) related to the transaction.
4. Total quantity of allowances issued to Ameren Missouri in the past year by the EPA.
5. Total quantity and monetary value of allowances used to offset emissions for each month for the quarter.
6. Total quantity of allowances (and monetary value thereof) used to offset sulfur premiums paid under coal contracts for each month for the quarter.
7. Total quantity and monetary value of unused allowances allocated to partners for each month for the quarter.
8. Budgeted Allowances and difference between actual number of allowances used and budgeted amount for each month for the quarter.
9. Beginning of each month average price for each month for the quarter.
10. End of each month average price for each month for the quarter.
11. End of month monetary total value of inventory for each month for the quarter.

**Once Per Year Reporting** *[typically provided within 5 months after the end of a calendar year]*

1. Regulatory Description of Allowance Trading Programs - Describe the specific regulatory regime(s) in-place during the reporting year, changes in regulatory regime from previous year, and expected changes for next year. For the initial report, provide a 5 year history of allowances which would include serial numbers, prices, and vintages. After the first year of reporting, update by providing the most current additional year of information.
2. Emission Allowance Tracking System - Describe the tracking system used to track allowances. The system should track allowances on a monthly basis by vintage year, including the quantity of allowances issued to Ameren Missouri in the past year by the EPA, by serial number, price, date of purchase, sale, or swap of emission allowances used to offset emissions. The system also tracks quantities of allowances (and value thereof) used to offset sulfur premiums paid under coal contracts, and the monthly quantities of unused allowances allocated to partners, including the monetary value received as a result of the transaction, and any expenses (such as brokerage fees) related to the transaction.
3. Average Price of Inventory - Describe the methodology for calculating the beginning year average price, monthly average price and year end average price of inventory. Methodology should include the monetary value received as a result of the transaction, and any expenses (such as brokerage fees) related to the transaction.



4. Types of Transactions - Identify and describe the type of transaction that may occur while managing allowance inventories including, purchases, sales, swaps, trades, allocations, and plant use of allowances.
5. Trading Parameters and Authorization - Describe the fundamental controls for allowance transactions as defined per Types of Transactions and identify the Company's Designated Representative and Alternate Designated Representative authorized to trade allowances.