

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

In the Matter of the Determination of Special	)	
Contemporary Resource Planning Issues to be	)	
Addressed by Ameren Missouri in its Next	)	File No. EO-2014-0062
Triennial Compliance Filing or Next Annual	)	
Report.	)	

**AMEREN MISSOURI’S COMMENTS ON THE PROPOSED LIST OF  
SPECIAL CONTEMPORARY ISSUES**

COMES NOW Union Electric Company d/b/a Ameren Missouri (Ameren Missouri or Company) and, pursuant to 4 CSR 22-080(4)(B), submits to the Missouri Public Service Commission (Commission) the following Comments on the Proposed List of Special Contemporary Issues:

1. 4 CSR 240-22.080(4) requires Missouri’s electric utility companies to consider and analyze “special contemporary issues” in their Integrated Resource Plan (IRP) triennial compliance filing and in their annual IRP update reports.
2. In September of 2013, the Missouri Department of Economic Development – Division of Energy, the Sierra Club and the Missouri Public Service Commission Staff each filed a list of proposed special contemporary issues for Ameren Missouri’s next triennial filing.
3. The language of 4 CSR 240-22.080(4) describes the purpose of the special contemporary issues list as “...to ensure that evolving regulatory, economic, financial, environmental, energy, technical, or customer issues are adequately addressed by each utility in its electric resource planning.” In addition, the Rule provides that “[e]ach special contemporary issues list will identify new and evolving issues, but may also include other issues such as unresolved deficiencies or concerns from the preceding triennial compliance filing.” 4 CSR 240.080(4).

4. Ameren Missouri has reviewed the proposed special contemporary issues lists proposed by the other parties and, as set forth in Attachment A, believes that many of the issues proposed by the parties do not merit treatment as special contemporary issues, in that such issues fall outside of the scope contemplated by and in 4 CSR 240.080(4). In other words, some of the issues submitted by the other stakeholders are not “new and evolving” and/or do not pertain to “unresolved deficiencies or concerns” from previous IRP filings. In addition, several of the suggestions request analysis of issues that Ameren Missouri already plans to undertake for its 2014 IRP.

5. With this in mind, Ameren Missouri submits with this pleading Attachment A, representing its comments on the proposed list of special contemporary issues. Ameren Missouri looks forward to continuing to work with stakeholders to address the issues presented in this docket.

WHEREFORE, Ameren Missouri submits its attached comments on the proposed list of special contemporary issues and requests, pursuant to 4 CSR 240 22.080(4)(C), the Commission issue an order reflecting the accepted list of special contemporary issues by November 1, 2014.

Respectfully Submitted,

/s/ Wendy K. Tatro

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**ATTORNEYS FOR UNION ELECTRIC  
COMPANY d/b/a AMEREN MISSOURI**

**CERTIFICATE OF SERVICE**

I do hereby certify that a true and correct copy of the foregoing document has been hand-delivered, transmitted by e-mail or mailed, First Class, postage prepaid, this 1<sup>st</sup> day of October, 2014, to counsel for all parties on the Commission's service list in this case.

/s/ Wendy K. Tatro