

In the Matter of Ameren Missouri's 2012)
Renewable Energy Standard Compliance Report.) Case No. EO-2013-

RENEWABLE ENERGY STANDARD COMPLIANCE REPORT AND REQUEST FOR WAIVER

COMES NOW Union Electric Company, d/b/a Ameren Missouri (Ameren Missouri or the Company), and provides its Renewable Energy Standard Compliance Report. Ameren Missouri also requests a waiver of a portion of the Commission's Renewable Energy Standard rules, found at 4 CSR 240-20.100(7)(A)1I, and states as follows:

1. As part of its efforts to comply with Missouri's Renewable Energy Standard (RES) law, Ameren Missouri is purchasing Renewable Energy Credits (RECs) from various sources.
2. For RECs purchased from a renewable energy resource not owned by Ameren Missouri, 4 CSR 240-20.100(7)(A)1I requires detailed information about each resource with a rated capacity of 10 kW or greater including, for example, the owner's name, address, meter readings underlying the RECs and an affidavit from the owner of the facility to certify that the RECs are from a renewable energy source.
3. Ameren Missouri asks the Missouri Public Service Commission (Commission) grant it a limited waiver of this requirement for two types of REC purchases - for REC purchases from the Company's customers and for RECs purchased from aggregators which are lawfully registered in another renewable energy registry.
4. First, Ameren Missouri is purchasing solar RECs (SRECs) from its own customers who have solar panels on their property. This is the Standard Offer Contract (SOC) which is found in the Company's Commission-approved tariff sheets. Some of these panels have

a rated capacity of over 10 kW. The Company does not believe it is necessary to require its customers to provide an affidavit with the information required by the above-cited regulation, as much of this information is already contained in the documentation Ameren Missouri requires as part of its application for the SOC. The Company will make these files available for Staff to inspect, if there is any question about the validity of any of the SRECs. Accordingly, the ability to verify the Company's compliance with Missouri's RES is not harmed by granting a waiver of the requirements found in 4 CSR 240-20.100(7)(A)1I.

5. Second, Ameren Missouri has purchased SRECs from aggregators who obtain the SRECs from various solar power producers on the West Coast, some of which are residential home owners and small businesses. Some of those facilities have a rated capacity of over 10 kW. Because these SRECs are purchased on its behalf, Ameren Missouri is not the holder of the information required by 4 CSR 240-20.100(7)A1I and so the Company requests a waiver so that it is not required to provide this information.

6. Even without this information being provided by the Company, the Commission can be assured that the SRECs being purchased are legitimate because they are registered through one of two renewable energy registry and tracking systems. Some are registered through the North American Renewables Registry (NAR) and some are registered through the Western Renewable Energy Generation Information System (WREGIS). WREGIS is a renewable energy registry and tracking system used for monitoring and tracking RECs in the western United States. It was developed by APX, Inc. This is the same company which developed and operates the NAR, which is the system chosen by the Commission to track Missouri RECs. These systems were developed in response the need to develop and implement a system for tracking renewable energy generation. The systems were designed to ensure the credibility of the "green" value of renewable electricity and are used by multiple states.

7. More information about WREGIS can be found at the California Energy Commission's website, <http://www.energy.ca.gov/portfolio/wregis>. Because these SRECs have WREGIS certification and are transferred directly into the Commission-approved REC tracking system, NAR, the requirement for the Company to provide the detailed information specified in the above referenced regulation can be waived without risking the validity of the Company's compliance with Missouri's RES. This can also be confirmed by reviewing the WREGIS Operating Rules, which set forth the detailed information required to be provided by the renewable energy generator (See Section 5.2; 5.3 and 12.2, for example). WREGIS's Operating Rules were attached as Exhibit 1 to the Company's waiver request in File No. EO-2012-0150. As the Commission is aware, the same information is available through NAR for systems using NAR.

8. Staff has supported Ameren Missouri's previous request for this waiver (File No. EO-2012-0150) and the Commission granted Ameren Missouri's request in that case. Ameren Missouri requests the Commission again grant it the requested waivers.

WHEREFORE, Ameren Missouri requests the Missouri Public Service Commission grant it a waiver of 4 CSR 240-20.100(7)(A)1I for the two categories of SREC purchases as described above.

Respectfully submitted,

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CERTIFICATE OF SERVICE

The undersigned certifies that a true and correct copy of the foregoing document was sent by electronic transmission, facsimile or email to all counsel of record on this April 15, 2013, to the following:

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/s/ Wendy K. Tatro

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