BEFORE THE PUBLIC SERVICE COMMISSION OF THE STATE OF MISSOURI

In the Matter of the Renewable Energy Standard)	
Compliance Report 2013 and Renewable Energy)	Case No. EO-2014-0291
Standard Compliance Plan 2014-2016)	

COMMENTS OF KARL R. RÁBAGO ON BEHALF OF MOSEIA

COMES NOW the Missouri Solar Energy Industries Association (MOSEIA), pursuant to 4 CSR 240-2.080, and offers these Comments from its expert Karl R. Rábago concerning Ameren Missouri's 2013 Renewable Energy Standard Compliance Report and 2014-2016 Renewable Energy Standard Compliance Plan. Mr. Rábago is the principal of Rábago Energy, LLC. Mr. Rábago has 24 years experience in electric utility regulation and policy, having served as a public utility commissioner in Texas, a federal energy executive, and a utility executive. After reviewing the confidential workpapers distributed by the Company in this case, Mr. Rábago offers the following analysis and observations on behalf of MOSEIA:

1. Ameren Missouri does not appear to have attempted to perform the one percent retail rate impact calculation appearing in section (5) of the Commission's rule at 4 CSR 240-20.100. Instead, the Company apparently has chosen to simply use 1% of its expected revenue requirement for the years 2014-2023. This may be a result of the confusion surrounding the proper way to perform the section (5) calculation, perhaps intended as a mere placeholder until the Commission provides guidance through its ongoing rulemaking to implement the provisions of House Bill 142 (HB142)(2013). Assuming the section (5) calculation were performed according to the rule, the RES budget over the 2014-2023 term could be significantly larger.

- 2. However, even accepting Ameren Missouri's simplified "1% of future revenue requirement" calculation, the Company appears to have ample funds available under the 1% limit each year from 2015-2023.
- 3. Ameren Missouri plans to collect **** billion from customers as non-RES revenue requirement during the term 2014-2023; 1% of the **** billion amount is ***** million. This is the "budget" for RES compliance over the current 10-year report term (2014-2023), using Ameren Missouri's simplified 1% calculation.
- 4. Ameren is currently committed to spend **** million on RES compliance during the same term.
- 5. Ameren's uncommitted RES budget over the 2014-2023 term is **** million. This means Ameren's uncommitted annual RES budget is an average **** million per year during the 2014-2023 term.
- 6. This analysis does not include future and unapproved resources inserted by Ameren Missouri in its plan in order to "use up" the uncommitted **** million RES "budget." This analysis also assumes that Ameren Missouri is allowed to charge excess RES spending in 2014 (relating to rebate spending and other costs) against the RES budget for remaining years of the term.

WHEREFORE, MOSEIA respectfully files these Comments of its expert Karl R Rábago concerning Ameren Missouri's 2013 Renewable Energy Standard Compliance Report and 2014-2016 Renewable Energy Standard Compliance Plan.

Respectfully Submitted,

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CERTIFICATE OF SERVICE

I hereby certify that copies of the foregoing have been served electronically on all counsel of record this 29^{th} of May, 2014.

/s/ Wendy Shoemyer
Wendy Shoemyer