

**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)	<u>Case No. EO-2013-0104</u>
Triennial Compliance Filing or Next Annual)	
Update 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 “the Company”) and, pursuant to 4 CSR 22-080(4)(B), submits to the Missouri Public Service Commission (“the 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. On September 14, 2012, the Missouri Department of Natural Resources (“DNR”) filed a proposed list of special contemporary issues for Ameren Missouri’s next triennial filing or its next annual update. Commission Staff (“Staff”) and the Sierra Club filed their respective proposed lists on September 17, 2012.

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, does not believe that any of the issues proposed by the parties 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, most 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. Most of the suggestions made by stakeholders this year are issues that have already been addressed by Ameren Missouri in its last IRP filings, that will be addressed Ameren Missouri in upcoming IRP filings, or are issues that are simply not significant enough to warrant inclusion. In respect to any unresolved concerns from previous IRP filings or dockets, the existing IRP rules already require the Company to update stakeholders on efforts related to any unresolved concerns, and it is therefore redundant and unnecessary to carry-forward these issues in subsequent issues lists.

5. The Commission’s Order on special contemporary issues for Ameren Missouri’s 2012 IRP Annual Update in Docket No. EO-2012-0039 included language clarifying the Commission’s standards for determining what issues should be addressed. In particular, the Commission noted that because Ameren Missouri would be filing an annual update rather than a triennial compliance filing in 2012, the Company was ““only expected to address changing conditions since the last filed triennial compliance filing or annual update filing.”” Order Establishing Special Contemporary Resource Planning Issues, issued October 19, 2011 (emphasizing the language of 4 CSR 240-22.080(3)(B)). As Ameren Missouri is again expected to file an annual update rather than a triennial compliance filing in 2013, the same standards should be applied in this matter.

6. The Commission should carefully consider which proposed issues it determines are special contemporary issues as contemplated by 4 CSR 240.080(4). Otherwise, the IRP process is subject to hijack by non-utility parties and fails to capture the stated intent of the revised IRP regulations.

7. 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, Union Electric Company d/b/a Ameren Missouri submits its attached comments on the proposed list of special contemporary issues and requests, pursuant to 4 CSR 240.080(4)(C), the Commission issue an order reflecting the accepted list of special contemporary issues by November 1, 2012.

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 1st day of October, 2012, to counsel for all parties on the Commission's service list in this case.

/s/ Wendy K. Tatro