

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

In the Matter of an Investigation of the Cost to	)	
Missouri's Electric Utilities Resulting from	)	File No. EW-2012-0065
Compliance with Federal Environmental Regulations.	)	

**COMMENTS OF AMEREN MISSOURI ON NRDC PRESENTATION**

COMES NOW Union Electric Company d/b/a Ameren Missouri (Ameren Missouri) and hereby submits these brief comments on the National Resources Defense Council's (NRDC) presentation at the October 28, 2013 Workshop on costs associated with EPA greenhouse gas regulations:

At the subject workshop, the NRDC presenter suggested that its proposal to EPA for establishing New Source Performance Standards of greenhouse gas emissions for existing coal-fired power plants under Section 111(d) of the Clean Air Act could be implemented with minimal cost to utility consumers. Ameren Missouri has examined the NRDC proposal, and strongly disagrees with this assertion. To the contrary, Ameren Missouri believes there will be significant rate impacts on Missouri electric utility ratepayers if the NRDC proposal is adopted.

Ameren Missouri will continue to be engaged in these greenhouse gas emission issues, including any further Commission examination of these issues, or EPA or DNR rulemakings relating to these issues, consistent with its obligation to provide safe and adequate service to its customers at just and reasonable rates.

Respectfully Submitted,

/s/ Thomas M. Byrne

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

**CERTIFICATE OF SERVICE**

I hereby certify that a copy of the foregoing was served via e-mail, to the Staff of the Missouri Public Service Commission and to the Office of the Public Counsel on the 15<sup>th</sup> day of November, 2013.

/s/ Thomas Byrne

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