

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

In the Matter of Ameren Missouri’s Submission)
Of its 2015-2017 RES Compliance Plan) File No. EO-2015-0267
and its 2014 Compliance Report)

FRED SAUER’S COMMENTS AND REQUEST FOR ORDER

COMES NOW Fred Sauer, pursuant to 4 CSR 240-20.100(7) and submits these comments in response to Union Electric Company d/b/a Ameren Missouri’s (“Ameren”) 2015-2017 RES Compliance Plan and its 2014 Compliance Report. Additionally, Sauer requests that the Commission order Ameren Missouri to cure the deficiencies described herein and re-file its compliance plan as follows.

1. On April 15, 2015, Union Electric Company d/b/a Ameren Missouri filed its 2014 RES Compliance Report and its 2015-2017 RES Compliance Plan pursuant to 4 CSR 240-20.100. On April 16, 2015, the Commission opened File No. EO-2015-0267, directed staff to file a report of its review by May 29, 2015.

2. Ameren’s 2015-2017 RES Compliance Plan fails to comply with Commission Rule 240.20.100(7)(A)1C because Ameren has wrongly not revealed the total generational output from the Pioneer Prairie Wind Farm supplied to Ameren Missouri customers for the CY 2014. Ameren has wrongfully designated this information as “highly confidential”.

3. Ameren’s 2015-2017 RES Compliance Plan fails to comply with Commission Rule 240.20.100(7)(A)1E because Ameren has wrongly not revealed the

number of RECs acquired, sold, transferred, or retired by the utility during the calendar year. Ameren has wrongfully designated this information as “highly confidential”.

4. Ameren’s 2015-2017 RES Compliance Plan fails to comply with Commission Rule 240.20.100(7)(A)1G because Ameren has wrongly not revealed the number of RECs being carried forward through the 3 year banking provision for the Pioneer Prairie Wind Farm. Ameren has wrongfully designated this information as “highly confidential”.

5. The absence of the above requested information makes it difficult to determine the true cost of renewable energy purchased from the Pioneer Prairie Wind Farm which is necessary to determine the true cost and propriety of renewable energy. By knowing how much energy Ameren purchases from the Pioneer Wind Farm, Sauer and other utility customers will be in a more informed position to better analyze any need or the propriety of future rate hikes.

WHEREFORE, Fred Sauer submits these comments and request that the Commission order Ameren Missouri to cure the deficiencies and refile its 2015-2017 RES Compliance Plan.

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CERTIFICATE OF SERVICE

I hereby certify that on June 19, 2015, the foregoing was mailed, faxed or emailed to all counsel of record:

/s/ Matt Hearne

Matt Hearne