

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

In the Matter Union Electric d/b/a Ameren)	
Missouri's Filing of the Renewable Energy)	File No. EO-2018-0287
Standard Compliance Plan for 2018-2020.)	

AMEREN MISSOURI'S REQUEST FOR VARIANCE

COMES NOW Union Electric Company d/b/a Ameren Missouri ("Ameren Missouri" or "Company") and for its *Request for Variance*, states as follows:

1. On April 13, 2018, Ameren Missouri submitted its Renewable Energy Standard (Section 393.1020 RSMo.) ("RES") Compliance Report for 2017.
2. The RES requires Ameren Missouri to retire Renewable Energy Credits ("RECs") in order to fulfill the RES requirements. The Missouri Public Service Commission's rule for RES compliance can be found at 4 CSR 240-20.100. Ameren Missouri requests a variance from a portion of that rule, specifically of 4 CSR 240-20.100(3)(J). This portion of the rule allows an electric utility to make REC retirements in the first quarter of the year subsequent to the compliance year, but limits those retirements to 10% of its total needed retirements.
3. For 2017, Ameren Missouri retired just under 15% of the required RECs in 2018, a number above the 10% limitation.
4. This was done in error. Since the Company's 2016 compliance filing, the individual responsible for ensuring the appropriate number of RECs were retired at the correct time has retired. The person now responsible for retirement decisions was unaware of the 10% limitation. Ameren Missouri has now ensured that all involved in the retirement decisions are aware of this limitation so that this error is not repeated in future years.

5. This error did not cause any harm to customers, as the total required amount of RECs were retired. The only difference is that 5% were retired late. The late retirements did not impact the cost of the RECs, the cost of the retirements, or any of the costs of compliance with the RES.

6. Ameren Missouri believes the above-stated facts constitute good cause shown for the Missouri Public Service Commission to grant it a variance from this portion of its RES rule.

WHEREFORE, Ameren Missouri respectfully requests the Missouri Public Service Commission grant Ameren Missouri a variance of 4 CSR 240-20.100(3)(J) for the reasons set forth above.

Respectfully submitted,

UNION ELECTRIC COMPANY,
d/b/a AMEREN MISSOURI

/s/ Wendy K. Tatro

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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 counsel for parties in this case on this 8th day of May, 2018.

/s/ Wendy K. Tatro