

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

In the Matter of a Repository File)	
Concerning Ameren Missouri's Submission)	File No. EO-2011-0275
of its 2011 RES Compliance Plan)	

**MISSOURI DEPARTMENT OF NATURAL RESOURCES (MDNR)
RESPONSE TO AMEREN MISSOURI'S RESPONSE
TO RENEW MISSOURI'S COMMENTS**

COMES NOW Missouri Department of Natural Resources ("MDNR") and respectfully submits these comments on Ameren Missouri's ("AMMO") Response to Renew Missouri's Comments on its Renewable Energy Standard ("RES") Compliance Plan for 2011-2013 ("RES Plan".)

1. On April 15, 2011 AMMO submitted its RES Plan for calendar years 2011 through 2013.
2. On May 30, 2011, the Staff of the Missouri Public Service Commission filed comments on AMMO's RES Plan. Staff concluded that there were no significant deficiencies in the plan.
3. On May 30, 2011, Renew Missouri also filed comments on AMMO's RES Plan. Renew Missouri's comments included a recommendation that the Commission require AMMO to commence MDNR certification of its renewable energy resources.
4. On June 10, 2011, AMMO filed a response to the comments of Renew Missouri stating that AMMO should not be ordered to "commence the MDNR certification process for its renewable energy resources." AMMO stated it had discussed the certification requirements with MDNR personnel and is working with them, and anticipates making its MDNR certification filing later this year.

5. MDNR confirms it has had discussions with AMMO regarding MDNR's certification requirements. On June 17, 2011, MDNR received applications for certification from AMMO and is reviewing those applications.

6. The Commission may wish to clarify the timing of MDNR certification vis a vis the utility compliance filings process, as AMMO stated in its Response that it was not clear that the Commission's rules contemplated certification prior to the filing deadline for the first RES compliance plans (page 6). If needed, MDNR would not object to the Commission granting a waiver of 4 CSR 240-20(7)(B)1 and 1.(G), which requires that a utility's RES compliance *plan* include verification that the utility "has met the requirements for not causing undue adverse air, water or land use impacts pursuant to subsection 393.1030.4, RSMo and the regulations of the Department of Natural Resources." In light of the short time that elapsed between the date MDNR's certification rules took effect and the deadline for the filing of the utilities' first RES compliance plans, good cause exists for such a waiver.

WHEREFORE, MDNR submits these comments on AMMO's Response to Renew Missouri's Comments on its RES Compliance Plan.

Respectfully submitted,

CHRIS KOSTER

/s/ Sarah Mangelsdorf
SARAH MANGELSDORF
Assistant Attorney General
MBE #59918
P. O. Box 899
Jefferson City, Missouri 65102
Telephone (573) 751-0052
TELEFAX No. (573) 751-8796
sarah.mangelsdorf@ago.mo.gov

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing was mailed, electronically, this 20th day of June, 2011, to counsel for the parties to this case.

/s/ Sarah Mangelsdorf
Assistant Attorney General