

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

In the Matter of a Determination of Special)
Contemporary Resource Planning Issues to be)
Addressed by Ameren Missouri in its Next)
Triennial Compliance Filing or Next Annual)
Update Report.)

File No. EO-2012-0039

**STAFF'S SUGGESTED SPECIAL
CONTEMPORARY RESOURCE PLANNING ISSUES**

COMES NOW the Staff of the Missouri Public Service Commission and suggests the Commission include the following eight issues in the list of special contemporary issues the Commission orders Union Electric Company d/b/a Ameren Missouri to analyze and document in its April 1, 2012 annual update report:

1. Aggressive regulations which allow aggregators of retail customers (ARCs) to market demand response services in Missouri.

Investigate and document the impacts on Ameren Missouri's preferred resource plan and contingency plans of aggressive regulations by the FERC, regional transmission organizations (RTOs) and/or Missouri statutes/regulations to allow ARCs to operate and market demand response services in Missouri.

2. Aggressive renewable energy standard with no rate cap.

Investigate and document the impacts on Ameren Missouri's preferred resource plan and contingency plans of a new much more aggressive renewable energy standard (*e.g.*, at least double the current standard for Missouri) with no rate cap.

3. Aggressive energy efficiency resource standard with no rate cap.

Investigate and document the impacts on Ameren Missouri's preferred resource plan and contingency plans of a very aggressive energy efficiency resource standard (*e.g.*, annual energy savings of 1.5% each year for 20 years and annual demand savings of 1.0% each year for 20 years from electric utility demand-side programs) with no rate cap in Missouri.

4. Loss of significant load.

Investigate and document the impacts on Ameren Missouri's preferred resource plan and contingency plans of a loss of significant load for the short term and potentially for the long term that may be the result of a prolonged double-dipped recession or a large customer or group of customers no longer taking service from Ameren Missouri.

5. Aggressive environmental regulations.

Investigate and document the impacts of aggressive environmental regulations on Ameren Missouri's preferred resource plan and contingency plans.

6. Reduced level of demand-side programs.

Identify Ameren Missouri's preferred resource plan and provide all updated Chapter 22 filing requirements impacted by the change from its preferred resource plan in File No. EO-2011-0271 (with "Low Risk" DSM) to its preferred resource plan identified in its April 1, 2012 annual update report.

7. Conventional nuclear construction costs and schedule.

Investigate and document the uncertain factor for uncertainty regarding construction costs and construction schedules for large scale nuclear generation alternatives on Ameren Missouri's preferred resource plan and contingency plans.

8. Modular nuclear construction costs and schedule.

Investigate and document the uncertain factor for uncertainty regarding construction costs and construction schedules for small modular nuclear generation alternatives on Ameren Missouri's preferred resource plan and contingency plans.

WHEREFORE, Staff recommends the Commission include the above listed issues in its order that contains the list of special contemporary issues which Union Electric Company d/b/a Ameren Missouri is to analyze and document in its April 1, 2012 annual update report.

Respectfully submitted,

/s/ Nathan Williams

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CERTIFICATE OF SERVICE

I hereby certify that copies of the foregoing have been mailed, hand-delivered, transmitted by facsimile or emailed to all counsel of record this 14th day of September 2011.

/s/ Nathan Williams