

**STATE OF MISSOURI  
PUBLIC SERVICE COMMISSION**

At a session of the Public Service Commission held at its office in Jefferson City on the 15<sup>th</sup> day of August, 2012.

In the Matter of Ameren Missouri's Submission of its )  
2011 RES Compliance Report and 2012-2014 ) **File No. EO-2012-0351**  
Compliance Plan )

**NOTICE REGARDING AMEREN MISSOURI'S 2011  
RES COMPLIANCE REPORT AND 2012-2014 COMPLIANCE PLAN**

Issue Date: August 15, 2012

On April 16, 2012, Union Electric Company, d/b/a Ameren Missouri, filed its Renewable Energy Standard Compliance Report for 2011, and its Renewable Energy Standard Compliance Plan for 2012-2014, as it was required to do by Commission Rule 4 CSR 240-20.100(7). The Commission's rule requires the Staff of the Commission to review the utility's compliance report and plan and to file a report about its review within 45 days.<sup>1</sup> Staff complied with that requirement by filing a report on May 31, reporting that it found no deficiencies in Ameren Missouri's plan.

The Commission's rule also allows Public Counsel and other interested persons or entities to file comments regarding Ameren Missouri's plan.<sup>2</sup> A group of environmental organizations,<sup>3</sup> a pair of organizations advocating increased use of wind power,<sup>4</sup> and the

---

<sup>1</sup> 4 CSR 240-20.100(7)(D).

<sup>2</sup> 4 CSR 240-20.100(7)(E).

<sup>3</sup> The environmental organizations are Earth Island Institute, d/b/a Renew Missouri, The Sierra Club, Missouri Coalition for the Environment, and Missouri Nuclear Weapons Education Fund, d/b/a Missourians for Safe Energy.

<sup>4</sup> The wind power advocates are Wind on the Wires and The Wind Coalition.

Missouri Department of Natural Resources (MDNR) filed such comments on May 31. Ameren Missouri responded to those comments on June 15.

The environmental organizations and the wind advocates describe what they contend are three deficiencies in Ameren Missouri's compliance report and plan. First, they contend that Ameren Missouri may not rely on electrical output from its existing Keokuk hydroelectric plant as a renewable resource. Second, they argue that Ameren Missouri may not rely on renewable energy credits (RECs) collected before January 1, 2011, to meet its renewable energy requirements for 2011 and subsequent years. Third, they claim that Ameren Missouri may not meet its solar obligations by purchasing unbundled RECs associated with power generated in other states. MDNR concedes that Ameren Missouri's 2011 Report and its 2012-2014 Plan comply with the Commission's rules, but laments that that Missouri's renewable energy standard has not yet created significant additional renewable energy development.

The Commission's regulation does not specify what, if any, action the Commission is to take regarding Ameren Missouri's RES compliance report and plan and any alleged deficiencies in that report and plan, except to allow the Commission to "establish a procedural schedule if necessary".<sup>5</sup> After considering the submitted comments, the Commission concludes that no further order from the Commission is appropriate at this time.

If the organizations that submitted comments, or anyone else, wants to further pursue their contention that Ameren Missouri has failed to comply with the requirements of the renewable energy statute or the Commission's implementing regulations, they may do

---

<sup>5</sup> 4 CSR 240-20.100(7)(F).

so by filing a complaint pursuant to Section 4 CSR 240-20.100)(8)(A) and the statutes and regulations governing complaints before the Commission.

**BY THE COMMISSION**

A handwritten signature in black ink, appearing to read "S. C. Reed", is positioned above the printed name of the Secretary.

Steven C. Reed  
Secretary

( S E A L )

Gunn, Chm., Jarrett, Kenney, and  
Stoll, CC., concur.

Woodruff, Chief Regulatory Law Judge