

BEFORE THE PUBLIC SERVICE COMMISSION
OF THE STATE OF MISSOURI

In the Matter of a Determination of Special)	
Contemporary Resource Planning Issues to be)	File No. EO-2015-0039
Addressed by Ameren Missouri in its Next)	
Triennial Compliance Filing or Next Annual)	
Update Report)	

LIST OF SUGGESTED SPECIAL CONTEMPORARY ISSUES OF SIERRA CLUB

Pursuant to 4 CSR 240-22.080(4), Sierra Club hereby recommends the following as special contemporary issues for consideration and analysis by Ameren Missouri (“Ameren”). Many of the below issues were also identified by Sierra Club in its comments on Ameren’s most recent integrated resource planning update docket, EO-2013-0424. Sierra Club filed comments in that docket on May 15, 2013 (Docket No. 15) and incorporates those comments herein by reference. Prudent utility planning also calls for Ameren to continue evaluating these issues, on the basis of up-to-date information, in its annual update reports and triennial compliance filings.

1. Developing and documenting the impact of demand-side management programs on future load growth, under low, base, and high projections.
2. Developing and documenting for use in all economic modeling and resource planning low, base, and high projections for natural gas prices, CO2 prices, and coal prices;
3. The prospects for the future price of electricity in the wholesale market, and the impact of any changes in wholesale market prices on Ameren’s ability to generate revenue through off-system sales;
4. Analyzing and documenting low, base, and high scenarios of projected off-system sales revenues under a range of assumed natural gas prices, CO2 prices, and coal prices;

5. Analyzing and documenting the future capital and operating costs faced by each Ameren coal-fired generating unit in order to comply with all existing, pending, or potential environmental standards, including:
 - a. Clean Air Act New Source Review provisions;
 - b. 1-hour Sulfur Dioxide National Ambient Air Quality Standard;
 - c. National Ambient Air Quality Standards for ozone and fine particulate matter;
 - d. Cross-State Air Pollution Rule, in the event that the rule is reinstated;
 - e. Clean Air Interstate Rule;
 - f. Mercury and Air Toxics Standards;
 - g. Clean Water Act Section 316(b) Cooling Water Intake Standards;
 - h. Clean Water Act Steam Electric Effluent Limitation Guidelines;
 - i. Coal Combustion Waste rules;
 - j. Clean Air Act Section 111(d) Greenhouse Gas standards for existing sources;
 - k. Clean Air Act Regional Haze requirements.
6. Analyzing and documenting the cost of any transmission grid upgrades or additions needed to address transmission grid reliability, stability, or voltage support impacts that could result from the retirement of any existing Ameren coal-fired generating unit;
7. Analyzing and documenting the criteria by which units are assigned various operational designations (e.g., “must run”) for use in all Company economic modeling and resource planning;
8. Analyzing and documenting on a unit-by-unit basis the net present value revenue requirement of the relative economics of continuing to operate each Ameren coal-fired generating unit versus retiring and replacing each such unit in light of all of the

environmental, capital, fuel, and O&M expenses needed to keep each such unit operating as compared to the cost of other demand side and supply side resources;

9. Analyzing and documenting the technical, maximum achievable, and realistic achievable energy and demand savings from demand side management, and incorporating each level of savings into Ameren resource planning process;
10. Analyzing and documenting the levels of achievable combined heat and power and incorporating such achievable CHP into Ameren's evaluation of demand side management; and
11. Analyzing and documenting cost and performance information sufficient to fairly analyze and compare utility-scale wind and solar resources to other supply-side alternatives.

Date: September 15, 2014

Respectfully submitted,

/s/ Henry Robertson

Henry B. Robertson
Great Rivers Environmental Law Center
319 N. Fourth St., Ste. 800
St. Louis, MO 63102
(314) 231-4181
hrobertson@greatriverslaw.org

Attorney for Sierra Club

Of counsel:

Sunil Bector
Associate Attorney
Sierra Club Environmental Law Program
85 Second Street, Second Floor
San Francisco, CA 94105-3441
(415) 977-5759
sunil.bector@sierraclub.org

Thomas Cmar
Staff Attorney
Earthjustice
5042 N. Leavitt St., Ste. 1

Chicago, IL 60625
(312) 257-9338
tcmar@earthjustice.org

CERTIFICATE OF SERVICE

I hereby certify that a true and correct PDF version of the foregoing was filed on EFIS and sent by email on this 15th day of September, 2014, to all counsel of record.

/s/ Henry Robertson
Henry Robertson