

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

In the Matter of Union Electric)
Company d/b/a Ameren Missouri's)
Voluntary Green Program/Pure Power)
Program Tariff Filing.)

Case No. EO-2013-0307
Tariff No. JE-2013-0197

JOINT STIPULATION OF NON-DISPUTED MATERIAL FACTS

COME NOW Staff of the Missouri Public Service Commission (“Staff”), Union Electric Company d/b/a Ameren Missouri (“Ameren Missouri”), and the Office of the Public Counsel (“OPC”), by and through their undersigned counsels, and state as follows:

Non-Disputed Material Facts

1. Ameren Missouri is a Missouri corporation with its principal place of business at One Ameren Plaza, 1901 Chouteau, St. Louis, MO 63103. Ameren Missouri is engaged in the business of providing electric services in Missouri to customers in its service areas.

2. Ameren Missouri is an “electrical corporation” and a “public utility” as those terms are defined in Section 386.020, RSMo (Supp. 2011), and is subject to the jurisdiction and supervision of the Commission as provided by law.

3. On October 19, 2012, Ameren Missouri filed tariff sheets revising its Pure Power Program. Those tariff sheets bear an effective date of May 1, 2013.

4. On November 20, 2012, the Staff filed a Motion to Open Investigation relating to Ameren Missouri’s Pure Power Program and its tariff filing. The Staff’s Motion arose out of a Stipulation and Agreement in Ameren Missouri’s recently concluded general electric rate case, Case No. ER-2012-0166.

5. By Order dated November 26, 2012, the Commission opened an investigation.

6. Thereafter, Staff, Ameren Missouri and OPC agreed upon a procedural schedule for the processing of this investigatory case. Staff and Ameren Missouri prefiled testimony in this matter.

7. A renewable energy credit ("REC") represents the property rights to the environmental, social and other non-power qualities of one megawatt hour of renewable energy generation. A REC can be sold separately from the underlying electricity generated by a renewable resource.

8. Under Ameren Missouri's Pure Power Program, Ameren Missouri customers may voluntarily make payments to Ameren Missouri, who then purchases and retires RECs on the customer's behalf. Ameren Missouri contracted with 3Degrees Group, Inc. d/b/a 3Degrees ("3Degrees"), which is not affiliated with Ameren Missouri, for 3Degrees to procure RECs for the Pure Power Program and to market and administer the Program.

9. Ameren Missouri's customers who choose to participate in the Pure Power Program currently pay Ameren Missouri \$15 per REC. Ameren Missouri retains \$1 of that payment and 3Degrees receives the remaining \$14.

10. Ameren Missouri has offered the Pure Power program since 2007.

11. Ameren Missouri made a one-time, up-front payment to 3Degrees of \$300,000 when it began offering the Pure Power Program.

12. Under its new contract with 3Degrees, Ameren Missouri would pay 3Degrees \$10.00 per REC purchased by an Ameren Missouri customer.

13. Under the new tariff sheets Ameren Missouri filed that initiated this case, Ameren Missouri's Pure Power Program would be modified so its customers could voluntarily pay \$10 per REC. Ameren Missouri would not retain any portion of the \$10. Ameren Missouri would then pay 3Degrees \$10 per REC subscribed to by Ameren Missouri's customers.

14. Under the current contract, as well as under the new contract, 3Degrees is required to acquire RECs, which come from either renewable resources in Missouri or from electricity that could be wheeled into Missouri.

15. Since 2009, 3Degrees has purchased all Pure Power RECs from renewable generators located in Missouri.

16. 3Degrees is not regulated by the Commission, and the Commission has no authority over 3Degrees.

17. 3Degrees maintains the information regarding the cost of RECs and costs of 3Degrees administering the Pure Power Program.

18. Ameren Missouri maintains a website that provides customers information on the Pure Power Program and instructions on how to sign up for the Program.

19. Customers may also check a box on the customer's bill to sign up for the Pure Power Program.

20. As of February 2013, the language on the customer's bill for the Pure Power Program reads: "Sign Up For *Pure Power* to support clean renewable energy in Missouri and the Midwest. By checking the box, a 1.5 cent per kilowatt hour charge will apply. You may cancel at any time."

21. Nine unregulated entities provide voluntary REC programs in Missouri and over 860 providers offer similar utility green pricing programs.

WHEREFORE, the parties file this Joint Stipulation of Non-Disputed Material Facts for the Commission's information and consideration.

Respectfully submitted,

/s/ Wendy K. Tatro

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CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing was served by electronic mail to all counsel of record on this 12th day of March 2013.

/s/Jennifer Hernandez