

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

In the Matter of Ameren Missouri's Submission) File No. EO-2013-0503
of its 2013-2015 RES Compliance Plan)

**MISSOURI DEPARTMENT OF NATURAL RESOURCES'
RESPONSE AND REQUEST FOR ADDITIONAL TIME**

COMES NOW Missouri Department of Natural Resources (MDNR) and, pursuant to the Commission's Order Directing Notice and Setting Filing Deadline, files this Response and Request for Additional Time.

1. On May 28, 2013, Ameren Missouri ("Ameren") filed its 2013-2015 Annual Renewable Energy Standard Compliance Plan pursuant to Commission Rule 4 CSR 240-20.100. The Commission opened Case No. EO-2013-0503 and on May 29, 2013, directed that notice be provided, that staff file a report of its review no later than July 12, 2013, and that the Office of the Public Counsel, and any other interested person or entity, may file comments regarding the report no later than July 12, 2013.

2. MDNR's Application to Intervene in this matter was granted on June 25, 2013.

3. Upon being granted intervenor status, MDNR obtained access to the Highly Confidential version of the plan on June 28, including Table 6, which contains the model supporting the calculation of the RES Retail Rate Impact required under Section (7) (B) 1 F of the Commission's RES rule. MDNR staff have worked diligently to review the calculation, but like the Missouri Industrial Energy Consumers (MIEC Motion for Extension of Time, July 9, 2013), has found that the formulas used to generate the calculation of Retail Rate Impact cannot be fully understood without further explanation which, due to the press of other matters, and staff scheduling issues, was not clearly determined in time to seek a meeting with company or an extension ahead of the filing deadline set by the Commission.

4. The Retail Rate Impact calculation is an important element of the RES Compliance Plan, and the complexity of the supporting formulae for Ameren's calculation warrants additional time for study and explanation. MDNR's initial review indicates that the Ameren, KCPL and GMO retail rate impact calculations (Case Nos. EO-2013-0504 and 0505, respectively) appear to have many similarities and may garner similar comments upon closer review. MDNR requests additional time to obtain information and explanation from Ameren Missouri related to this calculation, either individually or with other interested parties, and will make every effort to schedule a meeting and complete its review and comments within the three weeks extension that the Commission granted to MIEC on July 11, 2013, so that there will not be additional delay in the completion of comments on the Plan; this schedule will also keep the deadlines for comments in these three cases in relative proximity to each other, which is appropriate. This request is being filed as timely as possible.

WHEREFORE, the Missouri Department of Natural Resources respectfully requests that the Commission grant it additional time to August 2, 2013 to file its Comments.

Respectfully submitted,

CHRIS KOSTER
Attorney General

/s/Jeremy D. Knee
Jeremy D. Knee, Bar No. 64644
Assistant Attorney General
Agriculture & Environment Division
P.O. Box 899
Jefferson City, Missouri 65102
Phone: 573-751-8795
Fax: 573-751-8796
**Attorney for Missouri Department of
Natural Resources**

CERTIFICATE OF SERVICE

I hereby certify that copies of the foregoing have been mailed, hand-delivered, transmitted by facsimile or e-mailed to all counsel of record this 12th day of July 2013.

/s/Jeremy D. Knee

Jeremy D. Knee