



5. On April 16, 2016, the Commission issued its *Order Directing Notice And Setting Filing Date*, directing the Staff to file a report of its review of the Company's 2015 Compliance Report before May 30, 2016, forty-five (45) days from the Company's filing.

6. On May 31, 2016 the Commission granted an extension for Staff to file its report to allow Staff additional time to collect information from the Company. Again, on June 10, 2016 the Commission granted a further extension to no later than June 24, 2016. The Company and Staff have engaged in additional discussions, culminating in Ameren Missouri's filing a supplemental 2015 RES compliance report on June 23, 2016.

7. The Staff accepts Ameren Missouri's supplemental filing<sup>2</sup> because it addresses certain omissions in the Company's original 2015 compliance report that require correction. Also, the Company has agreed to adopt certain adjustments to its North American Renewables Registry ("NARR") concerning the reporting of Solar Renewable Energy Credits ("SRECs"). In its supplemental filing the Company further explains its corrections and adjustments regarding inadvertent omissions and SREC reallocation within NARR accounts. For purpose of compliance with the 2015 solar RES requirement, Staff recommends the Commission grant Ameren a variance from 4 CSR 240-20.100(3)(A) to allow Ameren to offset the unintentional retirement of 2013 and 2014 vintage double-counted SRECS from Ameren's newly certified 2015 reconciliation asset.<sup>3</sup>

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<sup>2</sup> See Ameren Missouri's Motion To File Supplemental Compliance Report filed June 23, 2016..

<sup>3</sup> Staff supports granting the Company a variance from the 4 CSR 240-20.100(3)(A) requirements that "The REC or S-REC creation is linked to the associated renewable energy resource..." because the result of the Company's corrections cannot definitively link the S-REC to an associated resource.

8. Connected with the above corrections for the 2015 compliance period, Ameren had also unintentionally retired double-counted S-RECs for the 2014 compliance period. Accordingly Staff recommends the Commission grant Ameren a variance from 4 CSR 240-20.100(3)(A) for the 2014 compliance period to allow Ameren to offset the unintentional retirement of 2013 and 2014 vintage double-counted S-RECs from Ameren's newly certified 2015 reconciliation asset. Because the netting occurred outside the 2014 compliance period,<sup>4</sup> Staff recommends the Commission also grant Ameren a variance from 4 CSR 240-20.100(3)(J). Staff also notes that the quantity of S-RECs being carried forward to future calendar years is accurate.

9. Staff has conducted its review of Ameren Missouri's 2015 RES Compliance Report as supplemented and has identified no deficiencies in the Company's 2015 RES Compliance Report. Staff's report is contained in its *Memorandum*, attached hereto as Attachment A and incorporated herein.

10. Staff notes the Commission has granted intervention in this matter to Missouri Department of Economic Development – Division of Energy, Earth Island Institute d/b/a Renew Missouri, United for Missouri, Inc. and the Missouri Industrial Energy Consumers.

**WHEREFORE**, the Staff submits its report for the Commission's information and consideration regarding Ameren Missouri's 2015 RES Compliance Report as supplemented by the Company and recommends that the Commission grant Ameren Missouri a variance from Commission rule 4 CSR 240-20.100(3)(A) to allow necessary corrections for the 2015 compliance period and for the effect the 2015 corrections have

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<sup>4</sup> 4 CSR 240-20.100(3)(J) requires "The RECs shall be retired during the calendar year for which compliance is sought..."

on the 2014 compliance period, and a variance for 4 CSR 240-20.100(3)(J) because the corrections occurred in late 2015.

Respectfully submitted,

**/s/ Robert S. Berlin**

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**CERTIFICATE OF SERVICE**

I hereby certify that a true and correct copy of the foregoing was served by electronic mail, or First Class United States Postal Mail, postage prepaid, on this 24<sup>th</sup> day of June, 2016, to all counsel of record.

**/s/ Robert S. Berlin**