

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

In the Matter of the Renewable Energy Standard     )  
Compliance Report 2016 and Renewable Energy     )     **File No. EO-2017-0268**  
Standard Compliance Plan 2017-2019                     )

**STAFF REPORT ON AMEREN MISSOURI'S 2017 – 2019 RES COMPLIANCE PLAN**

**COMES NOW** the Staff of the Missouri Public Service Commission, by and through undersigned counsel, and submits its *Staff Report On Ameren Missouri's 2017 -2019 RES Compliance Plan* to the Missouri Public Service Commission (Commission). In support thereof Staff states:

1. On April 13, 2017, Union Electric Company d/b/a Ameren Missouri (Company) filed its Annual Renewable Energy Standard (RES) Compliance Plan (Plan) for calendar years 2017 through 2019 as required by rule.<sup>1</sup>

2. Commission rule 4 CSR 240-20.100(8) states ... “Each electric utility shall file an annual RES compliance plan with the commission. The plan shall be filed no later than April 15 of each year.”

3. Rule 4 CSR 240-20.100(8)(B) specifies what information the utility must provide in its RES Compliance Plan.

4. Rule 4 CSR 240-20.100(8)(D) provides that:

The staff of the commission shall examine each electric utility's annual RES compliance report and RES compliance plan and file a report of its review with the commission within forty-five (45) days of the filing of the annual RES compliance report and RES compliance plan with the commission. The staff's report shall identify any deficiencies in the electric utility's compliance with the RES.

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<sup>1</sup> That same day Ameren Missouri also filed its 2016 RES Compliance Report and is addressed by Staff in a separate report.

5. On April 13, 2017, 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 2017-2019 Compliance Plan no later than May 30, 2017.

6. Staff has conducted its review of Ameren Missouri's Annual RES Compliance Plan for calendar years 2017 - 2019 and states that the Company has met the minimum requirements for the plan but is concerned that the Company's retail rate impact (RRI) calculations did not include the projected compliance costs for purchasing RECs (renewable energy credits) or additional wind which may be pursued during the planning period. RRI calculations are required in 4 CSR 240-20.100(8)(B)1.E. For reasons further discussed in Staff's Report (see *Memorandum*, attached hereto as Attachment A and incorporated herein) Staff recommends the Commission order Ameren Missouri to file an updated RRI calculation in this case concurrent with its 2017 IRP filing.

7. Staff notes the Commission has granted intervention in this matter to Missouri Industrial Energy Consumers, Missouri Department of Economic Development – Division of Energy, and Renew Missouri Advocates.

8. The Staff is unaware of any other case currently pending before the Commission that will affect or be affected by a decision in this file.

**WHEREFORE**, the Staff submits its report for the Commission's information and consideration regarding Ameren Missouri's 2017 – 2019 RES Compliance Plan and recommends the Commission order Ameren Missouri to file an updated

RRI (retail rate impact) calculation in this case concurrent with its 2017 IRP filing which is to be filed on or before October 1, 2017.<sup>2</sup>

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 26<sup>th</sup> day of May, 2017, to all counsel of record.

**/s/ Robert S. Berlin**

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<sup>2</sup> See *Order Granting Variance* issued July 22, 2015 in File No. EE-2015-0316.