



19). In fact, Ameren Missouri's response to a Staff data request states that the project is "...not specifically necessary to comply [with RES] during this planning period[.]" (See Ameren Missouri's response to Data Request No. MPSC 0011). Considering the company's existing ability to comply with the RES, Ameren Missouri's plan to construct a new solar facility requires further explanation. As filed, the compliance plan fails to include any analysis or information to verify that the utility-scale solar project is necessary, least cost, or prudent.

4. The absence of the information and analysis required by Commission Rule 4 CSR 240-20.100(7)(B)1.E does not necessarily mean that the project is not the least cost, prudent way to achieve compliance with the RES. However, without the required information neither the Commission nor the other parties can make an informed evaluation of the plan and it is not the burden of the other parties under the rules to seek out this information - it is the utility's burden to provide it. The company should not be permitted to shift burdens in this way and violation of the minimum filing requirements should have some consequence. The company's plan fails to meet the filing requirements, and so, Public Counsel requests that the Commission order Ameren Missouri to cure the deficiencies and re-file its compliance plan.

WHEREFORE, the Office of the Public Counsel submits these comments and requests that the Commission order Ameren Missouri to cure the deficiencies and re-file its 2015-2017 RES Compliance Plan.

