

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

In the Matter Union Electric d/b/a Ameren	)	
Missouri's Filing of the Renewable Energy	)	File No. EO-2018-0287
Standard Compliance Plan for 2018-2020.	)	

Ameren Missouri's Response To The Comments Of The Missouri Division Of Energy

COMES NOW Union Electric Company d/b/a Ameren Missouri ("Ameren Missouri" or "Company") and for its *Response to the Comments of the Missouri Division of Energy*, states as follows:

1. On April 13, 2018, Ameren Missouri submitted its Renewable Energy Standard (Section 393.1020 RSMo, et. seq.) ("RES") Compliance Plan for 2018-2020.

2. On May 29, 2018, the Missouri Division of Energy ("DE") filed the *Missouri Division of Energy's Comments Regarding Renewable Energy Standard Compliance Filings* ("Comments"). In its Comments, DE recommended Ameren Missouri "timely revise its RES filings, as needed, to account for SB 564's regulatory revisions and the near-term expiry of federal tax credits." (DE Comments, p. 4.)

3. Ameren Missouri does not believe it would be appropriate for the Missouri Public Service Commission ("Commission") to order Ameren Missouri to refile its RES Compliance Plan at this time.

4. Importantly, unlike the Integrated Resource Planning rules, the Commission's RES rules do not contain a requirement for, or a process by, which the Commission could require a utility to revise its RES Compliance Plan. As far as the Company is aware, the Commission has not required any utility to refile its Compliance Plan, especially for a law change that has not yet occurred.

5. It should be noted that DE's pleading does not allege that Ameren Missouri's Compliance Plan fails to meet any part of the law currently in effect. Instead, it asks Ameren Missouri to refile its plan as if a law change has already occurred. This request is simply premature.

6. More importantly, although all of the issues pointed out by DE are important (and will be analyzed and addressed by Ameren Missouri), it is simply too early to expect the Company to know how it will adjust its Compliance Plan for this new law. The basis for DE's recommendation is a law that is not yet effective. In fact, the law will not take effect until late August of this year. As of right now, there is no change to the law with which the Company must comply. In fact, the Company has not yet determined how its RES Compliance Plan will change with the new law. The Company will file a new RES Compliance Plan in 2019 and, at that time, will include the changes necessary in order to comply with the new law. Ameren Missouri does not contemplate any changes in 2018, but if any occur, they will be reflected in the Company's 2018 Compliance Report.

WHEREFORE, Ameren Missouri respectfully requests the Missouri Public Service Commission accept Ameren Missouri's response and close this case.

Respectfully submitted,

UNION ELECTRIC COMPANY,  
d/b/a AMEREN MISSOURI

/s/ Wendy K. Tatro

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**CERTIFICATE OF SERVICE**

The undersigned certifies that a true and correct copy of the foregoing document was sent by electronic transmission, facsimile, or email to counsel for parties in this case on this 8<sup>th</sup> day of June, 2018.

*/s/ Wendy K. Tatro* \_\_\_\_\_