

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

In the Matter of the Determination of Special)	
Contemporary Resource Planning Issues to be)	
Addressed by Ameren Missouri in its Next)	File No. EO-2019-0065
Triennial Compliance Filing or Next Annual)	
Update Report.)	

**AMEREN MISSOURI’S COMMENTS ON THE PROPOSED LIST OF
SPECIAL CONTEMPORARY ISSUES**

COMES NOW Union Electric Company d/b/a Ameren Missouri (Ameren Missouri or Company) and, pursuant to 4 CSR 22-080(4)(B), submits to the Missouri Public Service Commission (Commission) the following Comments on the Proposed List of Special Contemporary Issues:

1. 4 CSR 240-22.080(4) requires Missouri’s electric utility companies to consider and analyze “special contemporary issues” in their Integrated Resource Plan (IRP) triennial compliance filings and in their annual IRP update reports.

2. On September 14, 2018, the Missouri Public Service Commission Staff (Staff), the Office of the Public Counsel (OPC), the Missouri Department of Economic Development – Division of Energy (DE), Sierra Club (SC), and the Natural Resources Defense Council (NRDC), filed lists of proposed special contemporary issues for Ameren Missouri’s next triennial filing.

3. The language of 4 CSR 240-22.080(4) provides that the purpose of the special contemporary issues list is “ ... to ensure that evolving regulatory, economic, financial, environmental, energy, technical, or customer issues are adequately addressed by each utility in its electric resource planning.” In addition, the Rule provides that “[e]ach special contemporary issues list will identify new and evolving issues, but may also include other issues such as

unresolved deficiencies or concerns from the preceding triennial compliance filing.” 4 CSR 240-22.080(4).

4. Ameren Missouri has reviewed the special contemporary issues lists proposed by the other parties and, as set forth in Attachment A, and believes that some of the issues proposed by the parties should be included in the Company’s 2019 annual update filing or in its 2020 IRP filing. However, Ameren Missouri suggests some of these issues do not merit treatment as special contemporary issues because they fall outside of the scope contemplated by and in 4 CSR 240-22.080(4), since they are not “new and evolving,” and/or do not pertain to “unresolved deficiencies or concerns” from previous IRP filings.

5. With this in mind, Ameren Missouri submits Attachment A with this pleading, representing its comments on the proposed list of special contemporary issues. Ameren Missouri looks forward to continuing to work with stakeholders to address the issues presented in this docket.

WHEREFORE, Ameren Missouri submits its attached comments on the proposed list of special contemporary issues and requests.

Respectfully Submitted,

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CERTIFICATE OF SERVICE

I do hereby certify that a true and correct copy of the foregoing document has been hand-delivered, transmitted by e-mail or mailed, First Class, postage prepaid, this 1st day of October, 2018, to counsel for all parties on the Commission's service list in this case.

/s/ Paula N. Johnson