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

In the Matter of Ameren Missouri's	)	
Submission of its 2014 RES Compliance	)	File No. EO-2015-0267
Report and 2015-2017 Compliance Plan	)	

## STAFF REPORT ON COMPANY'S CALENDAR YEAR 2014 RES COMPLIANCE REPORT

COMES NOW Staff of the Missouri Public Service Commission (Staff), by and through the undersigned counsel, and submits this *Staff Report On Company's 2014 RES Compliance Report* (Staff Report) to the Missouri Public Service Commission (Commission). In support of the Staff Report, Staff respectfully states the following:

- On April 15, 2015, Union Electric Company d/b/a Ameren Missouri
   (Company) filed its 2012 Annual Renewable Energy Standard (RES) Compliance Report
   (Compliance Report) for calendar year 2014.
  - 2. Commission rule 4 CSR 240-20.100(7) states:

...Each electric utility shall file an RES compliance report no later than April 15 to report on the status of the utility's compliance with the renewable energy standard and the electric utility's compliance plan as described in this section for the most recently completed calendar year. The initial annual RES compliance report shall be filed by April 15, 2012, for the purpose of providing the necessary information for the first RES compliance year (2011)....

- 3. Rule 4 CSR 240-20.100(7)(A) specifies what information the RES Compliance Report shall provide.
  - 4. Rule 4 CSR 240-20.100(7)(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.

- 5. On April 16, 2015, 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 Compliance Report before May 29, 2015, forty-five (45) days from the Company's filing.
- 6. In its *Memorandum*, attached hereto and labeled as Attachment A, Staff reports on its review of the Company's Annual RES Compliance Report.
- 7. Upon examination, Staff discovered that the Company has not met the minimum requirements for compliance in 2014 by failing to meet the statutory S-REC retirement requirements. Staff is currently working with Ameren to determine the number of S-RECs needed for full compliance. Therefore, Staff recommends the Company obtain a waiver to retire S-RECs for 2014 compliance outside of the statutorily designated time frame.
- 8. The Staff is unaware of any other case currently pending before the Commission that a decision in this file will directly affect, or be affected by.

**WHEREFORE**, the Staff submits this *Staff Report* for the Commission's information and consideration.

Respectfully submitted,

## /s/ Nicole Mers

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## **CERTIFICATE OF SERVICE**

I hereby certify that a true and correct copy of the foregoing was served by electronic mail to Union Electric Company d/b/a Ameren Missouri at <a href="mailto:AmerenMoService@ameren.com">AmerenMoService@ameren.com</a>; and Allison Dustin, attorney for the Office of the Public Counsel at <a href="mailto:opcservice@ded.mo.gov">opcservice@ded.mo.gov</a> this 29<sup>th</sup> day of May, 2015.

/s/ Nicole	Mers
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