

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

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

**MISSOURI DIVISION OF ENERGY’S
RESPONSE TO COMMENTS OF RENEW MISSOURI REGARDING
AMEREN MISSOURI’S RES COMPLIANCE FILINGS**

COMES NOW the Missouri Department of Economic Development – Division of Energy¹ (“DE”) before the Missouri Public Service Commission (“Commission”) and, in response to the *Staff Report on Ameren Missouri’s 2017-2019 RES Compliance Plan* (“Report”)² and the *Comments of Renew Missouri Regarding Ameren Missouri’s RES Compliance Filings* (“Comments”),³ states as follows:

1. On April 13, 2017, Union Electric Company d/b/a Ameren Missouri (“Ameren Missouri” or “Company”) filed its 2016 Renewable Energy Standard Compliance Report and its 2017-2019 Renewable Energy Standard (“RES”) Compliance Plan (“Plan”), as required by 4 CSR 240-20.100(8).

2. On May 26, 2017, the Commission Staff (“Staff”) filed its *Staff Report on Ameren Missouri’s 2017 – 2019 RES Compliance Plan* and an accompanying memorandum. On May 30,

¹ Executive Order 13-03 transferred the Division of Energy from the Department of Natural Resources to the Department of Economic Development on August 29, 2013. The Executive Order transferred “all authority, powers, duties, functions, records, personnel, property, contracts, budgets, matters pending, and other pertinent vestiges of the Division of Energy from the Missouri Department of Natural Resources to the Missouri Department of Economic Development....”

² Missouri Public Service Commission Case No. EO-2017-0268, *In the Matter of the Renewable Energy Standard Compliance Report 2016 and Renewable Energy Standard Compliance Plan 2017-2019, Staff Report on Ameren Missouri’s 2017 -2019 RES Compliance Plan* (“Report”), May 26, 2017.

³ Missouri Public Service Commission Case No. EO-2017-0268, *In the Matter of the Renewable Energy Standard Compliance Report 2016 and Renewable Energy Standard Compliance Plan 2017-2019, Comments of Renew Missouri Regarding Ameren Missouri’s RES Compliance Filings* (“Comments”), May 30, 2017.

2017, Renew Missouri Advocates d/b/a Renew Missouri (“Renew Missouri”) filed its Comments. The Commission subsequently established June 15, 2017 as the date by which responses to Staff’s Report and the Comments of Renew Missouri must be filed.⁴

3. Renew Missouri indicates two concerns with Ameren Missouri’s Plan: that the Company has no “sustainable plan” for obtaining additional renewable resources, and that the Company may not use the Keokuk hydroelectric plant to meet RES requirements.⁵

4. In response to the latter of Renew Missouri’s concerns, DE notes its response to Ameren Missouri’s 2016 filing, which stated, in part:

DE acknowledges that the definitions at 4 CSR 240-20.100(1)(N)9 and 4 CSR 340-8.010(2)(A)8 [for eligible hydroelectric facilities] are inconsistent with the definition used for FERC reporting purposes. DE also acknowledges that a definition of “name plate rating” or “generator name plate rating” not encompassing an entire hydroelectric facility likely results in the lower penetration of renewable energy resources in utility portfolios.

WHEREFORE, due to this conflict in the definitions of “nameplate rating” used for FERC reporting purposes and RES reporting purposes, as well as the potential conflict with the legislative intent of the RES, DE offers that it is willing to work with the Commission to clarify the regulatory definitions of hydroelectric nameplate ratings for purposes of the RES.⁶

WHEREFORE, the Missouri Division of Energy respectfully submits its response to Renew Missouri’s Comments in the above-styled matter.

⁴ Missouri Public Service Commission Case No. EO-2017-0268, *In the Matter of the Renewable Energy Standard Compliance Report 2016 and Renewable Energy Standard Compliance Plan 2017-2019, Order Establishing Time to Respond to Staff’s Reports and Comments of Renew Missouri*, May 31, 2017.

⁵ Comments, pages 2-4.

⁶ Missouri Public Service Commission Case No. EO-2016-0286, *In the Matter of In the Matter of Union Electric Company, d/b/a/ Ameren Missouri’s 2015 RES Compliance Report and its 2016 RES Compliance Plan, Missouri Division of Energy’s Response to the Comments of Renew Missouri*, June 24, 2016, page 6.

Respectfully submitted,

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CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing has been served electronically on all counsel of record this 15th day of June, 2017.

/s/ Brian Bear

Brian Bear