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

In the Matter of Union Electric Company d/b/a Ameren Missouri's Solar Rebate Payment Tariff. File No. ET-2014-)

#### **NOTICE OF TARIFF ISSUE** AND MOTION FOR EXPEDITED ORDER

COMES NOW Union Electric Company d/b/a Ameren Missouri (Ameren Missouri or Company) and for its Notice of Tariff Issue and Motion for Expedited Order, states as follows:

Missouri law, at Section 393.1030.3, RSMo,<sup>1</sup> requires an electric utility 1. that believes it will reach the maximum average retail rate impact (RRI) limit provided for by Section 393.1030.2(1), RSMo. (Cum. Supp. 2012) before the end of the calendar year to make a filing with the Missouri Public Service Commission (Commission) prior to ceasing to pay solar rebates. Under the law, the Commission must determine that the maximum RRI will be reached before the end of the calendar year. Ameren Missouri is not, at this time, requesting the Commission make that determination.

2. However, Ameren Missouri may need to request that the Commission make this determination in the near future. This likelihood is driven by the fact that multiple methodologies for computing the maximum RRI have been put forth<sup>2</sup> but the Commission has not yet had an opportunity to make the determination of which methodology is appropriate. Some of these methodologies would result in a higher maximum RRI than the calculation provided by the Company in File No. EE-2013-0451 and some of these methodologies would result in a lower maximum RRI.

<sup>&</sup>lt;sup>1</sup> Amended by H.B. 142, effective August 28, 2013. <sup>2</sup> See ET-2014-0059, ET-2014-0071 and EE-2013-0451.

3. Ameren Missouri seeks to act in compliance with the law. As part of that effort, it would like to enter into confidential settlement discussions with the Commission Staff, the Office of the Public Counsel and other interested parties to see if these stakeholders can agree upon a maximum RRI calculation methodology. If, over the next few weeks, these discussions are not fruitful, Ameren Missouri will file a 60 day tariff in compliance with the law, using the methodology that will produce the lowest maximum RRI of any of the various methodologies that have been proposed. This would ensure that Ameren Missouri will not exceed the maximum RRI for 2013 should the Commission adopt that methodology.

4. Ameren Missouri respectfully requests the Commission issue an order making all participants in Ameren Missouri's Renewable Energy Standard Compliance Plan, File No. EE-2013-0451, parties to this case<sup>3</sup> and set a short date for other interested parties to request intervention. Ameren Missouri requests this order be issued by delegation today, September 30, 2013. This request is made as soon as possible after Ameren Missouri determined the need for this filing and there will be no negative impact upon customers or the general public by granting this request. Ameren Missouri will serve this pleading upon all participants in File No. EE-2013-0451 as well as upon all parties in the two open solar rebate cases involving Kansas City Power & Light Company and Kansas City Power & Light – Greater Missouri Operations Company, File Nos. ET-2014-0059 and ET-2014-0071.

**WHEREFORE**, Ameren Missouri respectfully requests the Missouri Public Service Commission issue an order today which makes all participants in File No. EE-

<sup>&</sup>lt;sup>3</sup> Setting aside Staff and the Office of the Public Counsel, this request would make Missouri Industrial Energy Consumers, Renew Missouri, and the Department of Energy (formerly a part of the Department of Natural Resources) parties to this case.

2013-0451 parties in this case and sets a deadline of October 3, 2013, for other interested parties to file a request for intervention.

Respectfully Submitted,

*Is/ Wendy K. Tatro* **Wendy K. Tatro**, #60261 Corporate Counsel **Thomas M. Byrne**, #33340 Director & Assistant General Counsel 1901 Chouteau Avenue, MC 1310 P.O. Box 66149 St. Louis, MO 63166-6149 Phone (314) 554-2514 Facsimile (314) 554-4014 amerenmoservice@ameren.com

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### ATTORNEYS FOR UNION ELECTRIC COMPANY d/b/a AMEREN MISSOURI

# **CERTIFICATE OF SERVICE**

The undersigned certifies that true and correct copies of the foregoing have been e-mailed or mailed, via first-class United States Mail, postage pre-paid, to the service list of record for File Nos. EE-2013-0451, ET-2014-0059 and ET-2014-0017 this 30<sup>th</sup> day of September, 2013.

Is Wendy K. Tatro

Wendy K. Tatro