

In the Matter of Union Electric Company)
d/b/a Ameren Missouri's Permission and Approval)
and a Certificate of Public Convenience and) **File No. EA-2014-0136**
Necessity Authorizing it to Construct, Install, Own,)
Operate, Maintain and Otherwise Control and)
Manage Solar Generation Facilities in O'Fallon,)
Missouri)

COMES NOW Earth Island Institute d/b/a Renew Missouri (“Renew Missouri”), by and through the undersigned counsel, and pursuant to 4 CSR 240-2.135(12) hereby submits this motion to reclassify as public certain information regarding the cost of the proposed solar facilities at issue in this case, as well as an accompanying motion. In support of its Motion, Renew Missouri states as follows:

2. On February 28, 2014, after the parties to this case were granted intervention and Regulatory Law Judge Pridgen issued an Order adopting the current procedural schedule, Ameren Missouri resubmitted its *Application* with the cost amount at pg. 4, ¶ 9 designated as “proprietary” rather than “highly confidential.”

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information and believes it is more appropriately classified as “Proprietary” rather than “Highly Confidential.”

4. Renew Missouri believes that the public has an interest in having access to documents showing how investor-owned utilities are proposing to comply with Missouri’s Renewable Energy Standard (“RES”), which Missouri voters overwhelmingly voted to enact in November, 2008.

5. Ameren Missouri has provided no justification for why the estimated cost of the proposed project’s initial construction should be designated “highly confidential” or “proprietary,” as opposed to “public.” In the absence of such justification, the Commission should order that Ameren Missouri refile its *Application* and designate the number at pg. 4, ¶ 9 as “public.”

6. Rule 4 CSR 240-2.135(12)(A) provides the party asserting that the information is proprietary or highly confidential with ten (10) days to file a pleading establishing the specific nature of the information that it seeks to protect and establishing the harm that may occur if that information is disclosed to the public. Rule 4 CSR 240-2.135(B) allows the Commission to order that the designated information be treated as public information if the asserting party fails to respond according to subsection (12)(A).

WHEREFORE, pursuant to 4 CSR 240-2.135(12), Renew Missouri requests that the Commission grant this Motion to Reclassify Information and – if Ameren Missouri fails to respond by Monday, March 17, 2014 – order that the designated information at pg. 4, ¶ 9 of the *Application* be treated as “public” rather than “proprietary.”

Respectfully submitted,

/s/ Andrew J. Linhares
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CERTIFICATE OF SERVICE

I do hereby certify that a true and correct copy of the foregoing document has been emailed this 6th day of March, 2014 to all counsel of record in this proceeding.

/s/ Andrew J. Linhares