

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

In the Matter of Ameren Missouri's )  
Submission of its 2011 RES ) Case No. EO-2012-0351  
Compliance Report and 2012-2014 )  
Compliance Plan )

**MISSOURI DEPARTMENT OF NATURAL RESOURCES' COMMENTS**

The Missouri Department of Natural Resources (MDNR), pursuant to 4 CSR 240-20.100, respectfully submits the following comments in response to the 2011 Compliance Report and 2012 Compliance Plan of Ameren Missouri.

In passing Proposition C, Missouri voters communicated their interest in more renewable energy than had been previously developed in Missouri by 2008. This first set of filings demonstrates that Missouri's renewable energy standard is not creating significant additional renewable energy development. While the 2011 Compliance Reports and 2012 Compliance Plans may comply with the Commission's rules, the results are disappointing to say the least, from a policy perspective. This is largely due to the fact that the utilities are counting pre-existing hydropower and aged renewable energy credits (RECs)--those generated before the first compliance year. MDNR once again recommends additional examination to clarify how to apply the standard to hydropower and how to "count" the three-year life of RECs.

Ameren's RES Compliance Plan for 2012-2014, page 17, states:

"All generating facilities utilized by Ameren Missouri to meet the requirements of the Missouri RES *have been certified* by the MDNR in accordance with 10 CSR 140-8.010(4)." (*Emphasis added.*) MDNR has certified all generating facilities Ameren reports in its RES Compliance **Report for 2011**. However, MDNR has not received an application from Ameren for certified generating facilities identified in Ameren's Compliance **Plan for 2012-2014** that will be used in these years. While it expects to receive an application from Ameren for such facilities in a timely manner, MDNR wanted to clarify this point.

Respectfully submitted,

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## **CERTIFICATE OF SERVICE**

I hereby certify that copies of the foregoing have been served electronically on all counsel of record this 31st day of May, 2012.

/s/ Jennifer S. Frazier

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