

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

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

REQUEST FOR COMMISSION ORDER

COMES NOW Union Electric Company d/b/a Ameren Missouri (Company or Ameren Missouri), and for its *Request for Commission Order*, respectfully states as follows:

1. On April 16, 2012, Ameren Missouri submitted its Renewable Energy Standard (RES) Compliance Plan (RES Plan) for calendar years 2012 through 2014.¹

2. Parties responded to Ameren Missouri's RES Plan on May 31, 2012. *Staff's Report on Ameren Missouri's RES Plan* recommended that the Missouri Public Service Commission (Commission) grant the Company a variance from the Commission's rules on how to calculate the 1% rate impact cap amount. Renew Missouri,² Wind on the Wires and the Wind Coalition filed comments on Ameren Missouri's RES Plan but did not raise any concern with how Ameren Missouri calculated the 1% rate impact cap amount.

3. On June 15, 2012, Ameren Missouri responded to the comments filed by other parties and formally requested a variance from the calculation methodology set forth in the Commission's regulations. No party filed any opposition to this requested variance. As Ameren Missouri explained in its response, it is requesting a variance from 4 CSR 240-20.100(7)(B)1F, the portion of the Commission's rules which requires the Compliance Plan to provide a "...detailed explanation of RES retail impact limit calculated in accordance with section (5) of

¹ At the same time and in the same docket, Ameren Missouri also filed its RES Compliance Report.

² The group of intervenors included the Sierra Club, the Missouri Coalition for the Environment, the Missouri Nuclear Weapons Education Fund, Missourians for Safe Energy, Renew Missouri, Missouri Solar Energy Industry Association and Earth Island Institute.

this rule.” Section (5) of the rule requires a highly detailed calculation of a revenue requirement which excludes renewable energy sources and includes costs associated with greenhouse gas costs. The impact of these adjustments is that the calculation, by design, produces a larger revenue requirement than the Company’s last Commission approved revenue requirement. As was true in the Company’s filing last year, Ameren Missouri’s cost to comply with the RES for this year and the next two calendar years is significantly less than 1% of its current revenue requirement. Accordingly, the extra calculations are not necessary to ensure Ameren Missouri’s compliance plan is obtainable within the statutory expenditure cap for 2011, 2012 and 2013 and it is appropriate for the Commission to grant a variance from this requirement.

4. The requested variance was the same as the variance requested in its previous RES Compliance Plan, in File No. EO-2011-0275. In that case, the Staff and the Missouri Industrial Energy Consumers each filed in support of the requested variance. The Missouri Department of Natural Resources and Renew Missouri each filed comments but did not object to the requested variance.

5. The Commission has never formally ruled on Ameren Missouri’s requested variance in this case but it is appropriate that they do so. No party has objected in this case to the variance request and, for the reasons set forth in the Staff Report and in the Company’s April 15, 2012, filing, the variance request should be granted.

WHEREFORE, Ameren Missouri asks the Missouri Public Service Commission to issue an order approving its requested variance in this case.

Respectfully Submitted,

/s/ Wendy K. Tatro

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

CERTIFICATE OF SERVICE

I do hereby certify that a true and correct copy of the foregoing document has been hand-delivered, transmitted by e-mail or mailed, First Class, postage prepaid, this 15th day of March, 2013, to all parties on the Commission's service list in this case.

/s/ Wendy K. Tatro