

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

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

**RESPONSE TO RENEW MISSOURI'S MOTION
TO RECLASSIFY INFORMATION AS PUBLIC**

COMES NOW Union Electric Company, d/b/a Ameren Missouri (“Ameren Missouri” or the "Company") and files the following *Response to Renew Missouri's Motion to Reclassify Information as Public*:

1. In its Application submitted in this proceeding, Ameren Missouri designated as "Highly Confidential" certain information related to the cost of construction of a new solar generation facility in O'Fallon, Missouri.
2. At Renew Missouri's request, Ameren Missouri re-evaluated the information and decided to reclassify the cost information in its application as "Proprietary" rather than "Highly Confidential." That change was made on February 28, 2014.
3. On March 6, 2014, Renew Missouri filed a request to make public the information designated as Proprietary.
4. Ameren Missouri opposes Renew Missouri's request to make this number public at this time. The information designated as Proprietary is one item in the application, which is the Company's cost estimate for this project. While Ameren Missouri has selected the primary contractor for this project, the subcontractors have not been selected nor have contracts with subcontractors been signed. Releasing Ameren Missouri's estimate of the project cost would

provide potential subcontractor bidders with information that could detrimentally impact the negotiations and ultimately drive up the cost of this project.

5. This information should be treated as confidential, under the Proprietary designation, during this proceeding and treating it in this manner is consistent with the Missouri Public Service Commission's regulations, found at 4 CSR 240-2.135. Renew Missouri perhaps does not appreciate that this case is not to determine the prudence of the costs of this project. That review will occur in a future rate case, during which Ameren Missouri will seek to place the cost into its revenue requirement. When that occurs, the overall cost of the project will be public.

WHEREFORE, Ameren Missouri opposes the request filed by Renew Missouri and asks the Missouri Public Service Commission to maintain the Proprietary designation of the cost estimate for this project.

Respectfully submitted,

UNION ELECTRIC COMPANY
d/b/a Ameren Missouri

By Wendy K. Tatro
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**ATTORNEYS FOR UNION ELECTRIC
COMPANY d/b/a AMEREN MISSOURI**

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that I have this 10th day of March, 2014, served the foregoing
either by electronic means, or by U. S. Mail, postage prepaid addressed to all parties of record.

Wendy K. Tatro

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