

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

In the Matter of Union Electric Company's
2011 Utility Resource Filing Pursuant to
4 CSR 240 – Chapter 22.

File No. EO-2011-0271

**STAFF'S REPORT ON UNION ELECTRIC COMPANY'S
2011 ELECTRIC UTILITY RESOURCE PLANNING COMPLIANCE FILING**

COMES NOW the Staff ("Staff") of the Missouri Public Service Commission ("Commission"), and submits its Report on Union Electric Company d/b/a Ameren Missouri's 2011 Chapter 22 Electric Utility Resource Planning Compliance Filing. In support thereof, Staff states:

1. Former rule 4 CSR 240-22.080(5)¹ provided that Staff shall review each compliance filing and, within 120 days after each utility's scheduled electric resource plan filing date, file a report that identifies, among other things, any deficiencies in the electric utility's compliance with the provisions of Chapter 22.

2. As part of its attached report Staff identifies both the deficiencies and the concerns Staff found during its limited review of Ameren Missouri's 2011 Chapter 22 Compliance Filing.

3. Staff found four deficiencies in Ameren Missouri's filing with respect to the following rules:

- 4 CSR 240-22.010 Policy Objectives
- 4 CSR 240-22.050 Demand-Side Resource Analysis
- 4 CSR 240-22.070 Risk Analysis and Strategy Selection

¹ New Chapter 22 rules became effective on May 31, 2011.

4. Staff did not identify any deficiencies with respect to Ameren Missouri's obligations arising from Missouri's statutory Renewable Energy Standards.

5. In its report Staff discusses the deficiencies and concerns it identified in Ameren Missouri's Compliance Filing. Staff also provides recommended resolutions to the deficiencies and concerns it identified.

WHEREFORE, Staff submits its report on Ameren Missouri's 2011 Chapter 22 Electric Utility Resource Planning Compliance Filing.

Respectfully submitted,

/s/ Nathan Williams

Nathan Williams

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Certificate of Service

I hereby certify that copies of the foregoing have been mailed, hand-delivered, transmitted by facsimile or electronically mailed to counsel of record this 23rd day of June, 2011.

/s/ Nathan Williams