

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

EARTH ISLAND INSTITUTE d/b/a)	
RENEW MISSOURI, et al.,)	
)	
Complainants,)	
)	
vs.)	Case No: EC-2013-0381
)	
UNION ELECTRIC COMPANY d/b/a)	
AMEREN MISSOURI,)	
)	
Respondent.)	

ANSWER

COMES NOW Union Electric Company d/b/a Ameren Missouri (“Ameren Missouri” or “Company”), and for its Answer to the Complaint filed in this proceeding, states as follows:

1. Respondent filed with the Commission its Renewable Energy Standard ("RES") Compliance Plan for 2011 and for 2012-2014 on April 16, 2012 in Case No. EO-2012-0351. The Commission's Staff filed a report on May 31, 2012 indicating that it found no deficiencies in Respondent's April 16, 2012 filings. The Commission, by Notice issued August 15, 2012, determined that no further order from the Commission was appropriate.

2. The Complaint that is the subject of this proceeding alleges that Ameren Missouri’s 2012-2014 RES Compliance plan is not in compliance with the Commission’s regulations, specifically 4 CSR 240-20.110(7)(B)1.F. Ameren Missouri believes this Complaint is generally without merit and should be denied.

3. Ameren Missouri’s answers to the specific allegations raised in the Complaint are provided below. Any allegation not specifically admitted herein by the Company should be considered denied.

ANSWERS TO SPECIFIC ALLEGATIONS

4. References hereafter to numbered paragraphs refer to the numbered paragraphs of the Complaint filed in EC-2013-0381.

5. Respondent is without sufficient knowledge of the allegations stated in Paragraph 1 and therefore denies same.

6. Respondent is without sufficient knowledge of the allegations stated in Paragraph 2 and therefore denies same.

7. Respondent is without sufficient knowledge of the allegations stated in Paragraph 3 and therefore denies same.

8. Respondent is without sufficient knowledge of the allegations stated in Paragraph 4 and therefore denies same.

9. Respondent is without sufficient knowledge of the allegations stated in Paragraph 5 and therefore denies same.

10. Respondent admits the allegations stated in Paragraph 6.

11. Respondent denies the allegations stated in Paragraph 7.

12. Respondent admits that the Commission has the jurisdiction to hear a complaint of a utility violation of a statute, regulation or order.

13. Respondent denies the allegations stated in Paragraph 9.

14. Respondent denies the allegations stated in Paragraph 10.

15. Respondent denies the allegations in Paragraph 11.

16. Respondent neither admits nor denies the allegations contained in Paragraph 12, as Missouri statutes speak for themselves.

17. Respondent neither admits nor denies the allegations contained in Paragraph 13, as Missouri statutes speak for themselves.

18. Respondent admits the allegations stated in Paragraph 14.

19. Respondent neither admits nor denies the allegations contained in Paragraph 15, as Commission rules speak for themselves.

20. Respondent neither admits nor denies the allegations contained in Paragraph 16, as Commission rules speak for themselves.

21. Respondent admits that the quotations in Paragraph 17 are a portion of the decision in the referenced Court of Appeals for the Western District of Missouri's decision.

22. Respondent admits the allegations stated in Paragraph 18.

23. Respondent incorporates its answers to paragraphs 1-18 of the Complaint in response to Paragraph 19.

24. Respondent denies the allegations stated in Paragraph 20.

25. Respondent neither admits nor denies the allegations contained in Paragraph 21, as Commission rules speak for themselves.

26. Respondent denies the allegations stated in Paragraph 22. Ameren Missouri requested a variance from the cited portion of the rule.

27. Respondent denies the allegations stated in Paragraph 23. Ameren Missouri did provide a calculation that calculated a 1% increase measured from its Commission ordered revenue requirement at that time, consistent with its waiver request.

28. Respondent denies the allegations stated in Paragraph 24.

29. Respondent denies the allegations in the first sentence as stated in Paragraph 25. Respondent admits the allegations in the last two sentences as stated in Paragraph 25.

30. Respondent denies the first sentence of the allegation stated in Paragraph 26. Respondent is without sufficient knowledge regarding the allegation that no utility has been granted a waiver from 4 CSR 240-20.100(7)(B)1.F and therefore denies same. Further, Ameren Missouri has requested a variance from this portion of the rule and that request is still outstanding.

31. Respondent denies the allegations stated in Paragraph 27.

32. Complainants fail to state a claim upon which relief can be granted.

33. The Commission retains authority to grant the waiver originally requested in Case No. EO-2010-0275 and should approve that request at this time.

WHEREFORE, Ameren Missouri respectfully requests that the Commission issue an order denying Complainants' requests for relief as stated in the Complaint and dismiss the Complaint with prejudice.

Respectfully Submitted,

/s/ Wendy K. Tatro

Wendy K. Tatro, #60261

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

CERTIFICATE OF SERVICE

The undersigned hereby certifies that a true and correct copy of the foregoing Answer was served on the following parties via electronic mail (e-mail) or via certified and regular mail on this 4th day of March, 2013.

/s/ Wendy K. Tatro
Wendy K. Tatro