

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

**In the Matter of Union Electric Company d/b/a)
Ameren Missouri's 2nd Filing to Implement) File No. EO-2015-0055
Regulatory Changes in Furtherance of Energy)
Efficiency as Allowed by MEEIA)**

**SIERRA CLUB'S RESPONSE TO COMMISSION ORDER
DIRECTING FILING**

Pursuant to the Missouri Public Service Commission's ("Commission") September 9, 2015 Order Directing Filing ("Order"), Sierra Club, by and through undersigned counsel, hereby submits the following response to the Commission's Order.

1. At the Commission's September 9, 2015 Agenda meeting, Commissioners raised two objections to the non-unanimous stipulation and agreement that Ameren and other parties filed in this case on June 30, 2015. The two objections concerned the demand-side investment mechanism ("DSIM"): (i) the absence of retrospective Evaluation, Measurement and Verification ("EM&V") in calculating the throughput disincentive; and (ii) the absence of a component of supply side investment reduction in calculating the performance incentive.

2. In its Order, the Commission directed parties to report back whether further negotiations that address the objections raised could be productive in reaching agreement on a Cycle 2 MEEIA Plan, and if so, whether the Commission should issue a revised procedural schedule. Order at 1.

3. Sierra Club understands that preliminary discussions between Ameren, Staff and Office of Public Counsel have occurred, and supports Staff's recommendation for an extension of time for parties to file responsive pleadings until September 22, 2015.

Dated this 16th day of September, 2015.

Respectfully submitted,

/s/ Jill Tauber

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CERTIFICATE OF SERVICE

I hereby certify that a true and correct PDF version of the foregoing was filed on EFIS and electronically mailed to all counsel of record on this 16th day of September, 2015.

/s/ Jill Tauber

Jill Tauber