

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

In the matter of Union Electric Company)
d/b/a AmerenUE's Tariff Filing to Revise)
its Multi-Family Income Qualified Energy)
Efficiency Program.)

Case No. ET-2010-0226
Tariff No. JE-2010-0475

STAFF RECOMMENDATION TO APPROVE TARIFF SHEETS

Comes now the Staff of the Missouri Public Service Commission and for its recommendation states:

1. On January 27, 2010, Union Electric Company d/b/a AmerenUE, (AmerenUE), filed two (2) tariff sheets designed to revise AmerenUE's Residential Energy Efficiency Multi-Family Income Qualified Program. With those tariff sheets, at Staff's suggestion, AmerenUE moved the Commission to allow the proposed revisions to go into effect on less than thirty days' notice. However, AmerenUE failed to allege in its motion good cause for the Commission to do so.

2. In response to AmerenUE's tariff filing and motion, on January 28, 2010, the Commission ordered Staff to file its recommendation regarding the tariff sheets by February 2, 2010.

4. In the attached Memorandum (Appendix A), Staff recommends the Commission issue an Order that both approves the following proposed tariff sheets, as filed on January 27, 2010, and, for good cause shown by Staff (the same bases stated in AmerenUE's filing letter), makes them effective on February 10, 2010, rather than February 26, 2010:

P.S.C. Mo. SCHEDULE NO. 5

1st Revised SHEET NO. 250 Cancelling Original SHEET NO. 250

1st Revised SHEET NO. 251 Cancelling Original SHEET NO. 251

5. Section 393.140(11), RSMo 2000, requires that proposed changes to tariffs not go into effect with less than thirty (30) days' notice, unless the Commission determines otherwise for "good cause shown."

6. The tariff sheets will change the program so that AmerenUE will make incentive payments directly to the installer of the energy efficiency qualifying lighting and appliances in multi-family properties consisting of three (3) or more dwelling units that are targeted for occupation by tenants who benefit from federal subsidies for housing. It also will require the owner or manager of the property to commit to "implementing Standard Lighting Incentives in common areas as applicable through the Company's Business or Residential Energy Efficiency Program and to meet any code requirements for occupancy." Early implementation of these changes to benefit tenants constitutes the good cause required by section 393.140(11), RSMo 2000, for the Commission to determine and order that the tariff sheets go into effect on less than thirty (30) days' notice.

7. The Staff has verified that AmerenUE has filed its annual report and is not delinquent on any assessment. Staff is not aware of any other matter before the Commission that affects or is affected by this filing.

WHEREFORE, the Staff recommends that the Commission issue an order that both approves the following proposed tariff sheets, as filed on January 27, 2010, and, for good cause shown, makes them effective on February 10, 2010, rather than February 26, 2010:

P.S.C. Mo. SCHEDULE NO. 5

1st Revised SHEET NO. 250 Cancelling Original SHEET NO. 250

1st Revised SHEET NO. 251 Cancelling Original SHEET NO. 251

Respectfully submitted,

/s/ Nathan Williams

Nathan Williams
Deputy General Counsel
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Certificate of Service

I hereby certify that copies of the foregoing have been mailed, hand-delivered, or transmitted by facsimile or electronically mailed to all counsel of record this 29th day of January 2010.

/s/ Nathan Williams

MEMORANDUM

TO: Missouri Public Service Commission Official Case File
Case No. ET-2010-0226, Tariff Tracking No. JE-2010-0475
Union Electric Company d/b/a AmerenUE

FROM: Matthew Barnes, Utility Regulatory Auditor IV
Dana Eaves, Utility Regulatory Auditor III
Tom Imhoff, Rate & Tariff Examination Supervisor, Project Coordinator
Mack McDuffey, Rate & Tariff Examiner II

/s/ John Rogers 1/29/2010 /s/ Nathan Williams 1/29/2010
John Rogers, Energy Department Nathan Williams
Chief Staff Counsel's Office

SUBJECT: Staff Recommendation for **Approval** of Tariff Sheets Filed to Revise
AmerenUE's Residential Energy Efficiency Multi-Family Income Qualified
Program

DATE: January 29, 2010

On January 27, 2010, Union Electric Company d/b/a AmerenUE (AmerenUE) filed with the Commission two (2) tariff sheets bearing an issue date of January 27, 2010, and an effective date of February 26, 2010 to revise AmerenUE's Residential Energy Efficiency Multi-Family Income Qualified Program (Program). On January 27, 2010, AmerenUE also filed Motion for Expedited Treatment requesting the Commission order the proposed tariff sheets be effective no later than February 10, 2010.

These proposed tariff sheets contain revisions to the Program that will: 1) allow AmerenUE to pay incentives directly to qualified Installer Program Partners for implementation of eligible measures instead of the present procedure of paying Building Program Partners, and 2) require a commitment by Building Program Partners to improve common areas of eligible buildings by implementing standard lighting incentives through AmerenUE's Business or Residential Energy Efficiency Program instead of the present procedure of implementing standard lighting incentives through AmerenUE's Residential Energy Efficiency Multi-Family Program

The two categories of Program Partners are:

1. Building Program Partners: Owners, operators, managers, developers and re-developers of Program-eligible multi-family residential properties.
2. Installer Program Partners: Building systems, specialty construction trades, and renovation and installation contractors appropriately registered and permitted to conduct business within AmerenUE's electric service area.

The purpose of the Program is to remove less energy efficient lighting and appliances and install program-specified energy efficiency measures in eligible building units of income-qualified tenants. The Program is available to Customers of AmerenUE who own or operate multi-family residential buildings of three (3) or more units where income qualified tenants live.

The Program will provide incentives for the direct installation of Program-specified Standard Measure Energy Efficiency Measures (Measures):

Light bulb	Thermostat	Dehumidifier
Faucet aerator head	Refrigerator	Hot water piping insulation
Showerhead	Window air conditioner	Hot water heater insulation

The Program will pay incentives, not to exceed a program-specified maximum amount, to reimburse Installer Program Partners for actual expenses incurred in the complete removal, decommissioning, recycling and disposal of existing conventional non-ENERGY STAR[®] qualified residential appliances, lighting, equipment, fixtures and fittings and for each such item's replacement on a one-for-one basis with new Measures.

During a January 20, 2010 conference call with Staff and The Office of Public Counsel, AmerenUE discussed its proposed tariff changes and announced that Honeywell Utility Solutions will be the new Program Administrator, replacing Lockheed-Martin. AmerenUE dismissed Lockheed-Martin in September 2009 as Program Administrator of all AmerenUE Residential Energy Efficiency programs.

It was also discussed that the new Program Administrator has identified viable quantities of potential program qualified federally subsidized buildings. Since federally subsidized funding guidelines match closely the income-qualifications for Program eligibility, these funding guidelines are being used to screen tenants' income levels to help with determination of Program eligibility.

AmerenUE has stated that getting Building Program Partners to invest in the Program has been difficult, and, as stated above, AmerenUE dismissed Lockheed-Martin as Program Administrator in September 2009. With the recent new Program Administrator Honeywell Utility Solutions, which has experience in other states with similar programs, the earlier the change to Installer Program Partners receiving the incentives and commitments by Building Program Partners to improve common areas of eligible buildings by implementing standard lighting incentives through AmerenUE's Business or Residential Energy Efficiency Program, the sooner income-qualified tenants of multi-family residential buildings of three (3) or more units will begin obtaining the benefits of the Program. During the January 20, 2010 conference call, there was discussion of the need to make the proposed revisions as soon as possible to improve the participation levels and impact of the Program., and Staff expressed its support for expedited treatment related to this tariff filing. Staff continues to support such treatment.

Staff Recommendation

The Staff has reviewed the proposed tariff sheets, and is of the opinion that they were filed in a timely manner and are in compliance with AmerenUE's Integrated Resource Plan in Case No. EO-2007-0409. The Staff therefore recommends that the Commission issue an order approving the following proposed tariff sheets, as filed on January 27, 2010, to become effective on February 10, 2010, as requested by in Ameren's Motion, with less than 30 day's notice for good cause shown pursuant to Section 393.140(11) RSMo 2000.

MO. P.S.C. SCHEDULE NO. 5

1st Revised SHEET NO. 250 CANCELLING Original SHEET NO. 250

1st Revised SHEET NO. 251 CANCELLING Original SHEET NO. 251

The Staff has verified that this Company is not delinquent on any assessment or the filing of its annual report. The Staff is not aware of any other matter pending before the Commission that affects or is affected by this tariff filing.