

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

In the Matter of Union Electric Company d/b/a)
Ameren Missouri's Filing to Implement Regulatory)
Changes in Furtherance of Energy Efficiency as)
Allowed by MEEIA.)
Case No. EO-2012-0142

**AMEREN MISSOURI'S RESPONSE
TO CHANGE REQUESTS**

COMES NOW the Union Electric Company d/b/a Ameren Missouri ("Ameren Missouri" or "Company"), files this Response to Change Requests filed in this case, and in support thereof states as follows:

1. On January 20, 2012, Ameren Missouri filed an application under the Missouri Energy Efficiency Investment Act ("MEEIA") and the Commission's MEEIA rules in Case No. EO-2012-0142. On July 5th, 2012, Ameren Missouri together with other interested parties submitted to the Commission for approval a Unanimous Stipulation and Agreement related to the Company's implementation of MEEIA. The Commission issued an Order approving the Stipulation on August 1, 2012 and as amended on December 19, 2012.

2. The Stipulation contained provisions related to the evaluation, measurement and verification ("EM&V") of energy efficiency measures undertaken by Ameren Missouri, including procedures whereby a party may request changes to the impact portion of the Final EM&V Reports for each year. The process by which leave is sought to change a Final EM&V Report is referred to as a "Change Request." Ameren Missouri has now completed the first year of energy efficiency measures, and third party

evaluators, Cadmus and ADM, have completed EM&V activities culminating in the filing of the evaluators' Final EM&V Reports as revised on June 12, 2014.

3. Ameren Missouri and Staff both filed Change Requests on July 3, 2014 in this case. No other party has filed a Change Request.

4. On Sept. 19, 2014, Staff and Ameren Missouri filed a Non-Unanimous Stipulation and Agreement Settling the Program Year 2013 Change Requests ("Change Request Stipulation"). On September 26, the Office of the Public Counsel ("OPC") filed an Objection to the Change Request Stipulation. Pursuant to the Commission's rules of practice, a non-unanimous stipulation and agreement (that is objected to) is a statement of position of the signatory parties that aligns with the filed stipulation. 4 CSR 240-2.115(2).

5. Accordingly, the position espoused in Staff's Change Request has now changed and aligns with the position provided for in the Change Request Stipulation. As it now stands, Staff's position does not depart from Ameren Missouri, having also changed its position pursuant to stipulation. Ameren Missouri continues to agree with the resolution reached in the Change Request Stipulation, which resolves all issues between Staff and the Company and also presents a path forward for the benefit of parties in future MEEIA EM&V proceedings.

6. Ameren Missouri acknowledges that OPC has made an objection to the stipulation and that objection will be adjudicated after a hearing pursuant to Commission rules. *Id.* Ameren Missouri intends to respond in full once OPC has identified the basis for its objection and a procedural schedule is approved by the Commission. Ameren

Missouri further notes that OPC has not filed a change request in this proceeding, and accordingly, there is nothing to respond to with respect to OPC's objection in this pleading.

WHEREFORE, Ameren Missouri respectfully requests that the Commission adopt the resolution of issues set forth in the Non-Unanimous Stipulation and Agreement Settling the Program Year 2013 Change Requests, and grant any further relief as it deems just and equitable.

Respectfully submitted,

Matthew R. Tomc

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**ATTORNEYS FOR UNION ELECTRIC
COMPANY D/B/A AMEREN MISSOURI**

CERTIFICATE OF SERVICE

I do hereby certify that a true and correct copy of the foregoing document has been hand-delivered, transmitted by e-mail or mailed, First Class, postage prepaid, this 6th day of October, 2014, to counsel for all parties on the Commission's service list in this case.

/s/ Matthew R. Tomc