

Ameren Missouri's
Response to MPSC Data Request
EO-2018-0211

Ameren Missouri's 3rd Filing to Implement Regulatory Changes in Energy Efficiency by
MEEIA

Data Request No.: OPC 2008

Does Ameren Missouri believe that opt-out customers are eligible for any MEEIA programs (including demand response)? Please explain why or why not.

RESPONSE

Prepared By: Tom Thompson
Title: General Supervisor
Date: 7/23/18

Ameren Missouri does not believe that opt-out customers are eligible for any MEEIA programs (including demand response) that are proposed in the MEEIA 2019-24 Plan. Customers that do not contribute financially to the costs of a MEEIA program generally should not have their participation subsidized by other customers, unless specifically allowed by statute (i.e., low-income customers).

Further, Ameren Missouri does not consider its programs (specifically, its demand response programs) to be either an interruptible or curtailable rate, since those are typically offered for a variety of reasons (e.g., reliability concerns) and are not strictly tied to energy efficiency. Per the MEEIA statute and rule (Section 393.1075 RSMo and 4 CSR 240-20.094(7)(M), respectively), opt-out customers could still participate in a non-MEEIA interruptible or curtailable rate option.