

**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) File No. EO-2012-0142
Furtherance of Energy Efficiency as allowed by MEEIA.)

AMEREN MISSOURI’S PROPOSED PROCEDURAL SCHEDULE

COMES NOW Union Electric Company d/b/a Ameren Missouri (Ameren Missouri or Company) and, pursuant to the Missouri Public Service Commission’s *Order Establishing Time to Submit a Proposed Procedural Schedule and Confirming Intervention of Parties*, submits the following:

1. Ameren Missouri filed its *Application* in this case on January 20, 2012.
2. The *Application* contained a proposed procedural schedule for processing this case within 120 days. The originally-proposed procedural schedule remains appropriate.
3. This proposed schedule sets forth a timeline that complies with the requirement for an order to be issued within “one hundred twenty (120) days of the filing of an *application* . . .” (emphasis added). 4 CSR 240-20.093(3). Indeed, the Commission has already adopted a portion of the Company’s proposed procedural schedule by ordering the suggested dates for intervention requests and responses to those intervention requests. The schedule below is the same schedule as was in the *Application*, except that the Company had previously suggested deadlines for “comments” and now believes “testimony” is more appropriate.

Date	Days	Cum. Days	Description
January 20, 2012	0	0	Filing Date
January 27, 2012	7	7	Intervention requests due
February 1, 2012	5	12	Response to Intervention Requests

March 5, 2012	32	44	Non-Ameren Missouri Parties File Rebuttal Testimony
March 26, 2012	21	65	Ameren Missouri Surrebuttal and Other Parties Cross Surrebuttal (in Response to Others Rebuttal)
April 10-11, 2012	12	80	Hearing dates (2 days)
May 1, 2012	21	101	Post Hearing Briefs
May 19, 2012	22	120	Commission Order

4. The Company renews its request that the Commission adopt this schedule, although it recognizes that a change to the hearing dates may be necessary if there are conflicts on the Commission's calendar.

5. Receiving an order from the Commission within the 120 days set forth by the Commission's regulations is very important to Ameren Missouri, for a multitude of reasons. As the Commission is aware, the Company's current bridge tariffs are set to expire on June 30th of this year, with a ramp down for most programs occurring throughout June. The contracts for implementation of the Company's current programs are six month contracts (January 1, 2012 through June 30, 2012), which can be renewed for an additional six months. Assuming approval of the Company's MEEIA filing, the Company will exercise its right to renew those contracts, which will allow the contractors to continue their work until the programs outlined in the MEEIA filing can be implemented in January, 2013. These contracts have monthly goals and pay incentives based on the attainment of the goals. They cannot be extended by merely modifying the dates of the contracts. Any change to these contracts will require the Company to renegotiate them, which would detract from the time needed for Company personnel to work on getting ready (post the requested May 19, 2012 decision by the Commission) for implementation of the Company's MEEIA energy efficiency programs in January of 2013. The work necessary to implement these programs is significant. The Company is currently working on the Requests

for Proposal (RFPs) it will issue to hire contractors (implementors and evaluators) and, given the very tight timing facing the Company, it will likely send the RFPs out for bid even before an order is issued in this case. After receiving and evaluating the bids from the RFPs, the Company anticipates it will take six months to hire these contractors and to then be ready for a full-scale launch of the three-year plan by January 1, 2013. In addition to the important contract negotiation period, there needs to be adequate time for finalizing program design with input from the evaluators. There are many additional pre-implementation activities, including training and infrastructure deployment, which must be completed prior to program launch. Assuming the Company receives Commission approval of its proposed programs and DSIM by May 19, 2012, meeting this tight schedule is already very challenging.

Not only is the timeframe tight assuming Commission approval of the programs and DSIM as proposed, but the Commission has the option to “approve, approve with modification acceptable to the electric utility, or reject” Ameren Missouri’s MEEIA *Application*. If the Commission approves the Company’s MEEIA filing with modifications, the Company will need to consider those modifications and determine if they are acceptable. This could potentially require time after the 120 days have expired before the Company can start signing contracts or making expenditures to start the implementation process for its MEEIA programs, further jeopardizing the Company’s ability to timely implement programs by January 2013.

6. Finally, as the Commission is aware, Ameren Missouri has not asked for a rider (because of the pending legal challenges to a rider’s use) but rather asked that the costs of its MEEIA proposal be included in the revenue requirement used to set rates in the Company’s pending electric rate case (Case No. ER-2012-0166). Rates are expected to be implemented in that rate case by January 2013, which coincides with the planned implementation of the

programs that are the subject of the MEEIA filing. An order issued in this case by May 19, 2012, can be incorporated into the rate case. If the timeline in this case is extended, there may come a point in time where the outcome of this case could not be incorporated into the rate case, leaving the Company unable to fund the MEEIA programs and potentially preventing it from proceeding with this *Application*. For all of these reasons, any material delay in the 120 days is very problematic.

8. While as outlined above, the Company is very concerned about a material extension of the time for decision outlined in the Commission's MEEIA rules, the Company does recognize that its filing is detailed (as it has to be given the Commission's extensive rules), contains a great deal of analysis, and introduces the use of a Technical Resource Manual. In order to make the review process easier, the Company has already taken several steps. First, the Company provided all parties with work papers (in fact, Staff, the Office of Public Counsel and the Department of Natural Resources received work papers the morning of the Company's MEEIA filing, before the filing was made) and has held a technical conference to walk through the filing last week. The Company anticipates that other technical conferences will be held on a regular basis, as long as is helpful, as this case proceeds. The Company's proposed schedule suggests a shortened time to answer data requests (from 20 to 14 days). The Company has hosted members of Staff at its offices to work through how it used the DSMore software in its analysis. Ameren Missouri has diligently attempted to reach an agreement upon a procedural schedule, but was ultimately unsuccessful. It is also important to note that the purpose of this case is to implement programs and a DSIM that promotes energy efficiency in Missouri while also remaining faithful to the mandates in MEEIA, including the mandate that the Commission align utility financial incentives with helping customers use energy more efficiently. The

Company desires to work with the parties to make that happen, and has taken and continues to take the necessary steps to make that happen. The Company hopes that other parties share in this desire, although Staff's motion in this case, filed earlier today, strikes the Company as a clear indication that Staff may not share in that goal.

9. If the Commission is unwilling to resolve this case in 120 days, the Company will undertake the work necessary to make one additional 60-day extension. Adoption of such an extension would require the Company to renegotiate contracts and revise its implementation plans. It would be difficult, but not impossible, to make this adjustment. However, any further extension of time beyond a 60-day extension would not be workable.

10. It is also important that the Commission promptly resolve these scheduling issues and the procedural issues raised by other filings, including Staff's filing earlier today regarding variances. (Obviously, the Company has not had time to respond to Staff's pleading but will do so by February 27th.) This case was filed on January 20th and it is now February 17th. One fourth of the 120 days set forth in the regulations have already expired and this case is still without a procedural schedule. Every day of continued uncertainty about the schedule in this case deprives the Company and other parties of the time and resources needed to move this case forward toward the goals we all should be working toward. The Company therefore respectfully requests that the Commission resolve these issues no later than its February 29, 2012 Agenda.

WHEREFORE, Ameren Missouri respectfully requests that the Missouri Public Service Commission adopt the procedural schedule as set forth above or, alternatively, extend the remaining dates therein by 60 days, and that it adopt such a schedule and resolve the pending motions regarding the procedure to be followed in this case no later than February 29, 2012.

Respectfully submitted,

UNION ELECTRIC COMPANY,
d/b/a Ameren Missouri

/s/ Wendy K. Tatro _____

Wendy K. Tatro, #60261
Associate General Counsel
Thomas M. Byrne, #33340
Managing Associate General Counsel
Ameren Services Company
P.O. Box 66149, MC 1310
St. Louis, MO 63166-6149
(314) 554-3484 (phone)
(314) 554-2514
(314) 554-4014 (fax)
AmerenMOService@ameren.com

James B. Lowery #40503
Smith Lewis, LLP
111 S. Ninth Street, Ste. 200
P.O. Box 918
Columbia, MO 65205
Telephone: (573) 443-3141
Fax: (573) 442-6686
Email: lowery@smithlewis.com

CERTIFICATE OF SERVICE

The undersigned certifies that true and correct copies of the foregoing have been e-mailed or mailed, via first-class United States Mail, postage pre-paid, to the service list of record this 17th day of February, 2012.

General Counsel's Office
Missouri Public Service Commission
Nathan Williams
P.O. Box 360
200 Madison Street, Suite 800
Jefferson City, Missouri 65102
gencounsel@psc.mo.gov
Nathan.Williams@psc.mo.gov

Office of the Public Counsel
Lewis Mills
P.O. Box 2230
200 Madison Street, Suite 650
Jefferson City, MO 65102-2230
opcservice@ded.mo.gov

Barnes-Jewish Hospital
Lisa Langeneckert
600 Washington Avenue, 15th Floor
St. Louis MO 63101-1313
llangeneckert@sandbergphoenix.com

Kansas City Power & Light Company
KCP&L Greater Missouri Operations
Company
James Fischer
101 Madison Street, Suite 400
Jefferson City MO 65101
jfischerpc@aol.com

Kansas City Power & Light Company
KCP&L Greater Missouri Operations
Company
Roger Steiner
P.O. Box 418679
1200 Main Street, 16th Floor
Kansas City MO 64105-9679
roger.steiner@kcpl.com

Laclede Gas Company
Michael Pendergast
Rick Zucker
720 Olive Street, Suite 1520
St. Louis MO 63101
mpendergast@lacledegas.com
rzucker@lacledegas.com

Missouri Department of Natural Resources
Frazier S Jennifer
P.O. Box 899
221 West High Street
Jefferson City MO 65102
jenny.frazier@ago.mo.gov

Missouri Industrial Energy Consumers
(MIEC)
Diana Vuylsteke
211 N. Broadway, Suite 3600
St. Louis MO 63102
dmvuylsteke@bryancave.com

Natural Resources Defense Council
Renew Missouri
Sierra Club
Henry Robertson
705 Olive Street, Suite 614
St. Louis MO 63101
hrobertson@greatriverslaw.org

/s/ Wendy K. Tatro

Wendy K. Tatro