

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

In the Matter of the Union Electric )  
Company's (d/b/a Ameren Missouri) Gas )  
Service Tariffs Removing Certain ) **Case No. GT-2011-0410**  
Provisions for Rebates from Their ) **Tariff File Number JG-2011-0620**  
Missouri Energy Efficient Natural Gas )  
Equipment and Building Shell Measure )  
Rebate Program. )

**INITIAL LIST OF ISSUES AND LIST OF WITNESSES**

**COMES NOW** the Staff of the Missouri Public Service Commission, on behalf of the Office of the Public Counsel (OPC), the Missouri Department of Natural Resources (MDNR), Ameren Missouri (Ameren Missouri) and, in compliance with the Commission's Order submits a List of Issues and a List of Witnesses.

**LIST OF ISSUES**

- I. Is Ameren Missouri's tariff filing in this case consistent with the Stipulation and Agreement in GR-2010-0363?
- a. Was there a change of circumstances as that phrase is used in the Stipulation and Agreement in ¶ 6G? If so, does the change warrant the removal of thirteen (13) residential and seven (7) general service measures from the energy efficiency program?
  - b. Was the evaluation performed by Ameren Missouri in this case done at an appropriate time pursuant to the Stipulation and Agreement in this case?
  - c. Does the proposed removal of these measures conflict with the terms of the Stipulation and Agreement that requires "uninterrupted availability of these energy efficiency programs through December 31, 2012," as required by ¶ 6G of the Stipulation and Agreement?
  - d. Did Ameren Missouri comply with ¶ 6G of the Stipulation and Agreement to circulate proposed tariff sheets for review and comment by the EEAG prior to filing the proposed changes with the Commission?

- e. How should “cost-effectiveness” as used in ¶6B of the Stipulation and Agreement be interpreted?
  - i. Should the TRC be the method used to determine cost-effectiveness under this stipulation and agreement?
  - ii. Was Ameren Missouri’s implementation of the TRC proper?
  - iii. Is the relevant cost effectiveness test defined in Commission Rule 4 CSR 240-14.010(6)(D)?
- II. Should the Commission adopt a definition of general applicability of “cost-effectiveness” in this case? If yes, should the test apply to all Missouri gas utilities?
- III. Should the Commission find that there is a need to specify how cost effectiveness will be determined for gas utilities in Missouri and state its intention to address this issue and other related energy efficiency issues associated with gas energy efficiency programs in a new Commission rulemaking?
- IV. Should the Commission take factors other than measure level cost effectiveness tests into account when determining what measures should be included in programs like the home energy audit program included in Ameren Missouri’s tariffs?
- V. Is this new tariff in the public interest?

#### **LIST OF WITNESSES**

Ameren Missouri – Gregory W. Lovett and Kyle Shoff

Department of Natural Resources – John Buchanan

Office of the Public Counsel – Ryan Kind

Staff – Michael Stahlman and Henry Warren

**WHEREFORE**, Staff, on behalf of the parties to the case, in compliance with the Commission's August 16 *Order Setting Proposed Procedural Schedule and Evidentiary Hearing* and files the List of Issues and List of Witnesses.

Respectfully submitted,

**/s/ Lera L. Shemwell**

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Respectfully submitted,

**/s/ Meghan E. McClowry**

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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 electronic mail to all counsel of record this 23rd day of September, 2011.

**/s/ Lera L. Shemwell**