

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

In the Matter of Union Electric)	
Company d/b/a Ameren Missouri's)	
2nd Filing to Implement Regulatory)	File No. EO-2015-0055
Changes in Furtherance of Energy)	
Efficiency as Allowed by MEEIA.)	

**JOINT STATEMENT OF POSITION OF
THE NATIONAL HOUSING TRUST AND
TOWER GROVE NEIGHBORHOODS CDC**

COME NOW the National Housing Trust (“NHT”) and Tower Grove Neighborhoods Community Development Corporation (“Tower Grove”), and hereby submit this Joint Statement of Position in the above-styled case.

A. Is the Company's Flex Pay Pilot Program ("Pilot") an energy efficiency program pilot under the Commission's rules, and should the Commission approve or reject the Pilot?

Position: While NHT and Tower Grove take no position on pre-pay programs generally, our parties do not consider the Company’s Flex Pay Pilot Program (“the Pilot”) to be an energy efficiency program under the Commission’s rules, and therefore the Commission should reject the Pilot.

Commission rule 4 CSR 240-20.092(1)(W) defines “energy efficiency” as: “measures that reduce the amount of electricity to achieve a given end-use.” As proposed, the Company’s Flex Pay Pilot Program does not seem to have a direct relation to reducing the amount of electricity to achieve a given end-use. Based on this basic reading of the Commission’s rules, the Pilot should not be considered an “energy efficiency program.”

While other types of demand-side measures beyond energy efficiency may be part of a Commission-approved MEEIA portfolio, NHT and Tower Grove do not consider the Pilot to fit the definition of “demand-side measures.” “Demand-side measure” at 4 CSR 240-20.092(1)(M) is defined as: “any program conducted by the utility to modify the net consumption of electricity on the retail customer’s side of the electric meter, including, but not limited to, energy efficiency measures, load management, demand response, and interruptible or curtailable load, *but not including deprivation of service or low-income weatherization.*” (emphasis added). The Commission’s rule specifically notes that “demand-side measures” are not to include deprivation of service, which can reasonably be interpreted to refer to pre-pay programs such as the Company’s Pilot in this case.

Due to this specific language in the Commission’s rules, NHT and Tower Grove do not believe the Company’s proposed Pilot is appropriate for the MEEIA context. Again, NHT and Tower Grove take no position on whether a program like the Company’s Pilot should be proposed outside of the MEEIA context.

B. How should a cost effectiveness test for this MEEIA pilot program be calculated and applied?

Position: NHT and Tower Grove take no position on this issue at this time.

C. How should the Commission define a low-income customer for purposes of the Company’s proposed pilot?

Position: NHT and Tower Grove take no position on this issue at this time.

D. Are there any alterations or conditions that should be applied to the Flex Pay Program Pilot if it is approved?

Position: NHT and Tower Grove take no position on this issue at this time.

WHEREFORE, NHT and Tower Grove respectfully submit this *Joint Statement of Position*.

Respectfully Submitted,

/s/ Andrew Linhares

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Certificate of Service

I hereby certify that copies of the foregoing have been mailed, emailed or hand-delivered to all counsel of record this 18th day of April 2018:

/s/ Andrew Linhares