

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

In the Matter of the Union Electric Company            )  
d/b/a Ameren Missouri's Tariffs to Increase            )  
Its Revenues for Natural Gas Service                    )        **File No. GR-2019-0077**

**MISSOURI DIVISION OF ENERGY'S  
STATEMENT OF POSITIONS**

COMES NOW the Missouri Department of Economic Development – Division of Energy (“DE”), and pursuant to Missouri Public Service Commission (“Commission”) Rule 4 CSR 240-2.140(4), respectfully offers the following statement of DE’s positions in the above-captioned matter involving Union Electric Company d/b/a Ameren Missouri (“Ameren Missouri” or “Company”). While DE did not offer testimony on all issues in the case, DE supports the Stipulation and Agreement filed July 18<sup>th</sup>, 2019 to resolve DE’s issues.

**What should be the design and budget of Ameren Missouri’s energy efficiency program?**

DE supports maintaining the Company’s energy efficiency and weatherization program funding at current levels<sup>1</sup> and fully expending these funds.<sup>2</sup>

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<sup>1</sup> Direct Testimony of Sharlet E. Kroll, p. 3, ll. 20-22; Stipulation and Agreement, pp. 3 and 4.

<sup>2</sup> Stipulation and Agreement, pp. 3 and 4.

**Who should administer the Company’s Income Eligible Weatherization Assistance Program (“IEWAP”)?**

DE supports transferring administration of the IEWAP to the Company. This transfer will allow the Company to work more flexibly with the weatherization agencies to design a program to assist its low-income customers.<sup>3</sup>

**What changes should be made to the billing statement?**

DE supports the resolution of this issue offered in the Stipulation and Agreement. Providing customers with additional information on the components of their bills can educate customers and inform their decision-making with regard to energy efficiency.<sup>4</sup>

Additional Issues Suggested by the Office of Public Counsel

**What should happen to any balance of the unspent energy efficiency funds?**

DE supports the disposition of the unspent energy efficiency funds provided for in the Stipulation and Agreement.<sup>5</sup>

**What should Ameren Missouri’s weatherization program include?**

With the transfer of administration of the IEWAP to the Company, Ameren Missouri will have increased flexibility to work with the weatherization agencies to design a program to assist its low-income customers.<sup>6</sup>

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<sup>3</sup> Kroll Direct, pp. 14-15, ll. 4-20 and 1-15.

<sup>4</sup> Rebuttal Testimony of Martin R. Hyman, p. 9, ll. 1-8.

<sup>5</sup> Stipulation and Agreement, p. 4.

<sup>6</sup> Kroll Direct, pp. 14-15, ll. 10-20 and 1-15.

WHEREFORE, the Division of Energy respectfully offers the above statement of its position on certain issues, and retains the right to take future positions on these and other issues as the case progresses.

Respectfully submitted,

/s/ Rochelle L. Reeves

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**Attorney for Missouri Department of  
Economic Development – Division of Energy**

### **CERTIFICATE OF SERVICE**

I hereby certify that true and correct copies of the foregoing have been emailed to the certified service list this 22<sup>nd</sup> day of July, 2019.

/s/ Rochelle L. Reeves

Rochelle L. Reeves