



July 24, 2015

Ms. Natelle Dietrich
Missouri Public Service Commission
P.O. Box 360
Jefferson City, Missouri 65102

Case No. EW-2015-0105 – MEEIA Effectiveness Review Workshop

Ms. Dietrich:

At this time, Ameren Missouri has reviewed the informal comments of the parties to this workshop docket. Our positions have not changed, and we stand by our previous comments. We understand that the Commission Staff is endeavoring to get a rule to the Commission for review in early August, presumably with the intent of publishing a first notice rule to commence a formal rulemaking. It is also our understanding that the manner in which the rule will be presented to the Commission will be a rule with inset boxes identifying the positions of the various parties, and that the Commission can then read and accept or reject various recommendations regarding the recommendations of the parties.

We disagree with this approach.

The draft document with which we have been presented contains an amalgamation of disparate positions taken from utilities, Missouri stakeholders, and also special interest groups. The format in which we understand the rule to be presented does not lend itself to the development of a thoughtful and comprehensive rule intended to guide Missouri utilities as they contemplate the permissive offering of energy efficiency services to customers.

We remain concerned that parties continue to attempt to redraft Missouri statutory law in this rulemaking in order to impose mandatory energy efficiency policies adverse to utilities, rather than work within the current paradigm of permissive energy efficiency programs that align the interests of the utilities and customers. Other proposed language is the result of factual misunderstanding and confusion regarding highly technical but important issues. This presents a series of false choices for the Commission in its efforts to set forth a lawful and effective rule. It is simply not possible to offer adequate explanation of the consequence of these changes in the form of a blurb inserted in a text box to a proposed regulation.

If the goal is to produce a meaningful rule, then the current approach will not be successful under the course presently set for this rule. We believe that a rule should not be published at this time. Rather, we believe further work needs to be done. Further, Ameren Missouri just completed its MEEIA Cycle 2 application hearing and a Commission Order will be forth coming. The stakeholders will be in a better position to address the most pertinent issues and contemplate the direction of Commission policy after that decision is issued. Publishing a rule now, only to substantially re-draft it after that decision is issued would not be a productive use of the parties' time.

Additionally, the Company has received the proposed comments and language of the Office of the Public Counsel (OPC). Ameren Missouri disagrees with these changes and additions in their entirety. The only effect OPC's language would have on energy efficiency is to discourage investor owned utilities in the State of Missouri from proposing energy efficiency programs.

Notwithstanding the above stated concerns and pursuant to your specific request for us to do so, we have updated the marked-up rules (and text boxes) to reflect a summary of our positions. Please see Attachment A to this letter. Our comments are highlighted in yellow.

Mindful of the issues emerging from its current MEEIA filing, Ameren Missouri is more than willing to take an active leadership role in the development of a constructive MEEIA implementation rule. We respectfully request that the dialogue continue and alternative approaches be considered prior to publishing a proposed rule, including a draft representing a unified position of the Missouri utilities.

Sincerely,

A handwritten signature in blue ink, appearing to read "Matthew R. Tomc", written in a cursive style.

Matthew R. Tomc

Enclosures