

Exhibit No.:

Issues: DMS and Weatherization
Program

Witness: Lena M. Mantle

Sponsoring Party: MO PSC Staff

Type of Exhibit: Rebuttal Testimony

Case No.: ER-2007-0002

Date Testimony Prepared: January 31, 2007

MISSOURI PUBLIC SERVICE COMMISSION

UTILITY OPERATIONS DIVISION

REBUTTAL TESTIMONY

OF

LENA M. MANTLE

**UNION ELECTRIC COMPANY d/b/a
AMERENUE**

CASE NO. ER-2007-0002

**Jefferson City, Missouri
January 2007**

**** Denotes highly confidential information ****

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

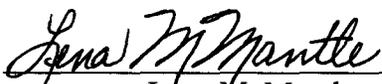
In the Matter of Union Electric Company)
d/b/a AmerenUE for Authority to File)
Tariffs Increasing Rates for Electric)
Service Provided to Customers in the)
Company's Missouri Service Area.)

Case No. ER-2007-0002

AFFIDAVIT OF LENA M. MANTLE

STATE OF MISSOURI)
) ss
COUNTY OF COLE)

Lena M. Mantle, of lawful age, on her oath states: that she has participated in the preparation of the following Rebuttal Testimony in question and answer form, consisting of 5 pages of Rebuttal Testimony to be presented in the above case, that the answers in the following Rebuttal Testimony were given by her; that she has knowledge of the matters set forth in such answers; and that such matters are true to the best of her knowledge and belief.

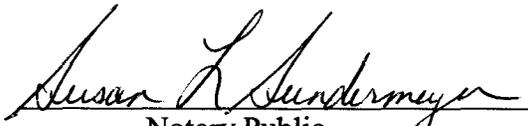


Lena M. Mantle

Subscribed and sworn to before me this 30th day of January, 2007



SUSAN L. SUNDERMEYER
My Commission Expires
September 21, 2010
Callaway County
Commission #06942086



Notary Public

My commission expires 9-21-10

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OF
LENA M. MANTLE
UNION ELECTRIC COMPANY d/b/a
AMERENUE
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1 shared by the ratepayers and Ameren’s shareholders. I am also recommending that the
2 Commission order AmerenUE to do a process and impact analysis of its weatherization
3 program and file a sheet to be placed in its tariff that describes the program funding and
4 eligibility requirements for weatherization.

5 **DSM GOALS AND REQUIREMENTS**

6 Q. What are the DSM goals that MEC recommends the Commission set for
7 AmerenUE?

8 A. In her direct testimony, Ms. Wilbers recommends that the Commission set DSM
9 goals as a percent of growth in both peak demand and energy. Based on the peak demand
10 and energy forecast used in AmerenUE’s preferred resource plan filed in its resource
11 planning case, I calculated the following megawatt (MW) and megawatt hour (MWh)
12 reduction goals that correspond to these percentages.

13 Table 1
14

Year	Percent Reduction		Estimated Reduction in Growth in:			
			Peak Demand (MW)		Energy (MWh)	
**	**	**	**	**	**	**
**	**	**	**	**	**	**
**	**	**	**	**	**	**
**	**	**	**	**	**	**

15
16 Q. Do you find these goals to be unreasonable?

17 A. For a utility the size of AmerenUE, I do not find these goals to be unreasonably
18 high. However, the goals may be unreasonably low since AmerenUE witness Mr. Moehn
19 states in his direct testimony that long term goals “may be as high as 300 MW as modeled in
20 the AmerenUE IRP filing.” (Moehn direct, pg. 16, lns. 12-14) In addition, AmerenUE
21 witness Robert J. Mill proposes in his direct testimony for this case an Industrial Demand

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1 Response Pilot. This DSM pilot would limit participation to a total demand response
2 aggregated load of 100 MW. (Mills direct, pg. 12 lns. 3-4) Taking this into account,
3 ** ___ ** MW is an unreasonably low goal.

4 Q. Would you please explain more about why the Commission should not require a
5 dollar amount funding for DSM programs?

6 A. One of the objectives of the Commission's Electric Utility Resource Planning
7 rules (Chapter 22) is that demand-side and supply-side resource should be evaluated on an
8 equivalent basis (4 CSR 240-22.010(2)(A)). To require a specified level of resources be
9 spent on DSM programs does not treat supply-side and demand-side resources on an
10 equivalent basis. More important than the amount to be spent on DSM programs is whether
11 or not DSM is cost-effective for AmerenUE's customers. It is Staff's position that DSM
12 programs should be carefully screened, all cost-effective DSM programs should be further
13 evaluated in an integrated recourse planning screening model and, if a program is shown to
14 be a cost effective resource, the risk and uncertainty of that program should be evaluated. At
15 that point in the analysis, a DSM program should be implemented. DSM programs should
16 not be implemented solely to meet a dollar spending requirement.

17 Q. What recommendations do you have for the Commission regarding DSM goals?

18 A. I recommend that the Commission require AmerenUE to adopt the DSM goals
19 that MEC proposes as shown in Table 1 and also require that peak demand and energy
20 reduction goals be revised after the Staff, Office of Public Counsel, MEC and other parties
21 that intervene in the upcoming case have had an opportunity to review the comprehensive
22 resource planning filing that AmerenUE has agreed to make on February 5, 2008 in Case No.
23 EO-2006-0240.

1 I am also recommending that the Commission not set an expenditure amount goal for
2 DSM programs.

3 **WEATHERIZATION PROGRAM**

4 Q. Please explain the weatherization program.

5 A. The weatherization program was initiated as a result of the Stipulation and
6 Agreement in the Staff complaint case, Case No. EC-2002-1. AmerenUE funds \$1.2 million
7 dollars for weatherization of low income homes in AmerenUE's territory. The program is
8 administered through local community action agencies. The funding for the program was
9 provided by Ameren.

10 Q. What is MEC recommending regarding AmerenUE's weatherization program?

11 A. MEC recommends that AmerenUE's current weatherization program be
12 continued "at an annual funding level of \$1.2 million annually until AmerenUE's next rate
13 case or until the commission rescinds the program by Order." (Wilbers direct, pg. 11, ln.18-
14 21)

15 Q. Do you agree with MEC's recommendations regarding the weatherization
16 program?

17 A. For the most part, I do agree with Ms. Wilbers. I agree that the current program
18 should be continued with a distribution to the affected community action agencies in October
19 2007. (Wilbers direct, pg. 11, ln. 23 - pg. 12, ln. 1) However, Ms. Wilbers implies that this
20 cost should be recovered from the rate payers when she describes the cost at approximately
21 \$0.09 per customer per month. (Wilbers direct, pg. 12, ln. 4-6) I recommend that the
22 Ameren fund 50 percent (i.e., \$600,000) of the program costs. The other 50 percent should
23 be recovered from AmerenUE ratepayers.

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1 Q. Do you have anything that you would like to add to Ms. Wilbers proposal?

2 A. Yes. The weatherization program is not included in AmerenUE's electric tariffs.
3 Therefore, I recommend that the Commission require AmerenUE to include the
4 weatherization program in its electric tariff in order for AmerenUE customers to know the
5 funding and the eligibility requirements for the program.

6 I also recommend that the Commission require AmerenUE to do a process and impact
7 evaluation of the current program to determine any improvements which could be made to
8 the program and the amount of energy savings being achieved by this program. The payment
9 for this evaluation could be from the amount set aside for this program but it should not cost
10 more than \$120,000.

11 Q. Does this conclude your rebuttal testimony?

12 A. This concludes my testimony for the revenue requirement rebuttal filing of this
13 case. I will also be filing in the class cost of service and rate design rebuttal filing.