ISSUES LIST EO-2012-0142

1. Should the Commission approve Ameren Missouri's application for approval of demand-side program plan, approve it with modification acceptable to Ameren Missouri, or reject it, as provided in 4 CSR 240-20.094(3)?
   A. Should the Commission approve the application without the inclusion of any demand response programs?

   B. Should the Commission approve the form of Ameren Missouri's DSM programs' exemplar tariff sheets which were attached to the surrebuttal testimony of Daniel Laurent?

      i. Should the Commission order Ameren Missouri to provide additional detail in its DSM programs'tariff sheets? If so, what detail?

      ii. Do the DSM programs'exemplar tariff sheets comply with the Commission's Promotional Practices requirements found in 4 CSR 240-3.150 and 4 CSR 240-14.030? If not, how do they not comply, and should the Commission grant a variance(s) to the extent they are determined not to comply?

   C. Should the Commission condition the approval of Ameren Missouri's application upon Ameren Missouri filing in this case a total resource cost test for its Residential Refrigerator Recycling and Residential Home Energy Performance programs consistent with the definition in 4 CSR 240-3.164(1)(X); and Ameren Missouri's commitment to conduct a careful and thorough review and analysis of demand-response programs as part of its next DSM market potential study and subsequent Chapter 22 compliance filing and/or annual update filings?

   D. Should the Commission grant the variances requested by Ameren Missouri, including those discussed in Dan Laurent's surrebuttal testimony, necessary to approve the Ameren Missouri's demand-side program plan, as filed?

   E. Can the Commission order Ameren Missouri to complete a new Market Potential Study? If so, should it do so?

   F. Can the Commission order Ameren Missouri to include in all future MEEIA filings the realistic achievable potential portfolio of the Company's Demand-side management Market Potential Study? If so, should it do so?

2. Should the Commission approve the establishment of Ameren Missouri's proposed Demand-Side Investment Mechanism (DSIM) as per 4 CSR 240-20.093(2)(B)?

A. Should the Commission allow Ameren Missouri to include in its revenue requirement in Case No. ER-2012-0166 $32.5 million, which represents 15.4% of expected net shared benefits, or should that determination be reserved for the rate case?

B. Should the Commission allow Ameren Missouri to collect, after the three-year program plan is concluded, a portion of net benefits as an incentive (pursuant to a sliding scale dependent upon MWh achievement levels – with percentage 4.8% of net benefits if energy savings achieved equal 100% of Commission approved three-year energy (MWh) savings target)?

C. Should the award levels proposed by Ameren Missouri as depicted in Figure 2.5 of Ameren Missouri's MEEIA report and the resulting percentages be approved?

D. With regard to items A and B:

i. Should the Commission approve the corrected Technical Resource Manual (TRM) as set forth in the attachment to the surrebuttal testimony of Richard Voytas?

ii. Should the true-up of the net benefits be based on the number of measures installed using the energy and demand savings values and equations in the approved TRM, meaning the energy and demand savings values and equations in the TRM remain static for the three years of Ameren Missouri's MEEIA programs, with any later revisions to the values and equations in the TRM to be applied on a prospective basis only (not to the operation of the programs during the three-year period proposed in this filing), or should later revisions to the energy and demand savings values and equations in the TRM be applied retrospectively?

iii. Should the energy and demand savings values and equations included in the TRM be modified after each round of EM&V?

iv. What annual energy and demand savings targets should the Commission approve for the DSM programs? Should the annual energy and demand savings targets be based on assumed net-to-gross (NTG) ratios equal to 1.0 or should they be based on NTG from EM&V from Program Year 2 from Ameren Missouri's prior cycle of programs (i.e., October 2009 to September 2010)? Should the Commission set the Net-to-Gross ration (NTG) ratio for the refrigerator recycling program at .64 and the NTG ratio for all other programs at 1? If not, what NTG ratios should be used? If so, should those ratios be held constant for the three years of the program?

E. Should the Commission order Ameren Missouri's residential customer charge increase from $8 to $12 or should that determination be reserved for the rate case?

F. Should the Commission order interest/carrying cost to be paid on over- under-recoveries? If so, should Ameren Missouri's AFUDC rate or its short term interest rate apply?

G. Should the Commission grant the variances requested by Ameren Missouri necessary to approve Ameren Missouri's DSIM, as filed?

H. Should the rate customers pay for DSM programs approved under MEEIA have a summer and winter component?

I. Do the Commission's regulations require tariff sheets associated with a DSIM apart from tariff sheets that reflect the DSM programs or base rate schedules that reflect the sums to be collected under the DSIM? If so, what should such a tariff sheets contain? If not, is there a reason that such tariff sheets associated with a DSIM be filed and if so, what should such tariff sheets contain?

i. What provision relating to true-up of the program expenditures, net shared benefit and the results of a Commission prudence review of the DSM programs should be included in Ameren Missouri's base rate tariffs?

3. Should a separate line item appear on bills relating to charges for the DSM programs approved under MEEIA? If so, should the phrase "Demand-Side Inv. Recovery" as suggested by Staff or "Energy Efficiency Investment Charge" as suggested by Ameren Missouri be used?

A. Should a separate line item appear on bills relating to charges for DSM programs not approved under MEEIA.

4. Is it appropriate for the Commission to determine what, if any, impact this case has upon Ameren Missouri's requested Rate of Return in Case No. ER-2012-0166, or should any such determination be reserved for the rate case?

5. Should the Commission approve Ameren Missouri's Evaluation, Measurement and Verification plans?

6. How should the costs for Ameren Missouri's proposed Low Income Residential program be allocated among the different rate classes?

7. Should the Commission grant the variances requested by Ameren Missouri, including those discussed in Dan Laurent's surrebuttal testimony, necessary to approve the Company's DSIM as filed, and any other variances necessary if the Commission

approves and the Company accepts a DSIM proposal made by the Staff or other parties in this case?

8. Should Ameren Missouri track business class program expenditures and energy reductions arising from Ameren Missouri's business DSM programs by rate schedule?

9. Should the program expenditures and performance payments arising from the Company's business DSM programs be trued-up among rate schedules within the business class of customers, with the results of the true-up to be accounted for in a future rate proceeding?

10. Should the Stipulation and Agreement filed by Ameren Missouri and Laclede Gas Company on May 11, 2012 be approved?

11. Should the Commission order the establishment of a statewide and/or Ameren Missouri collaborative(s) that would provide input regarding the possible expansion of Ameren Missouri programs, program design (possibly including co-delivery of programs with gas/water utilities), EM&V, and a state Technical Reference Manual? If the Commission does order that a collaborative(s) be established, can utilities implementing DSM programs under MEEIA be required to provide funding for outside consultants or other reasonable costs of operating the collaborative(s)? If so, should they be required to provide funding for outside consultants or other reasonable costs of operating the collaborative(s)?