

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        )        **File No. EO-2015-0055**  
Regulatory Changes in Furtherance of Energy        )  
Efficiency as Allowed by MEEIA                        )

**SIERRA CLUB’S OBJECTION TO**  
**AMEREN MISSOURI’S NON-UNANIMOUS STIPULATION AND**  
**AGREEMENT**

Pursuant to Commission Rule 4 CSR 240-2.115(2)(B), Sierra Club, by and through counsel, hereby files its objection to the Non-Unanimous Stipulation and Agreement filed on June 30, 2015 on behalf of Union Electric Company d/b/a Ameren Missouri (“Ameren Missouri”) and other parties (“Ameren Missouri’s Non-Unanimous Stipulation”). In support of its objection, Sierra Club states as follows:

1. On December 22, 2014, Ameren Missouri filed its proposed MEEIA Cycle 2 Plan for Commission approval. As Sierra Club witness Woolf explained in rebuttal testimony, the Plan dramatically understates the amount of cost-effective energy efficiency that is realistically achievable, includes energy savings goals that are too low, and does not represent progress towards achieving all cost-effective efficiency savings. Woolf Rebuttal (Docket Item No. 58) at 5. A primary driver of Ameren Missouri’s low achievable efficiency potential estimate, on which its Plan is based, is its flawed assumptions about customer participation rates. *See, e.g., id.* at 24-26.
2. Ameren Missouri’s Non-Unanimous Stipulation does not sufficiently address these and other critical deficiencies of the proposed Plan. Overall, savings are low and the

concerns that Sierra Club and other parties have raised with respect to program participation rates and efficiency savings estimates remain.

3. As a result, Sierra Club objects to Ameren Missouri's Non-Unanimous Stipulation. Sierra Club will provide a more detailed explanation of its concerns in its position statement.

WHEREFORE, Sierra Club respectfully files its objection to Ameren Missouri's Non-Unanimous Stipulation.

Dated this 7th day of July, 2015.

Respectfully submitted,

/s/ Jill Tauber

Admitted Pro Hac Vice

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**CERTIFICATE OF SERVICE**

I hereby certify that a true and correct PDF version of the foregoing was filed on EFIS and electronically mailed to all counsel of record on this 7th day of July, 2015.

/s/ Jill Tauber  
Jill Tauber