

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

In the Matter of Union Electric Company d/b/a)
Ameren Missouri’s Filing to Implement) **Case No. EO-2012-0142**
Regulatory Changes in Furtherance of Energy)
Efficiency As Allowed by MEEIA.)

STATEMENT OF POSITION OF LACLEDE GAS COMPANY

COMES NOW Laclede Gas Company (“Laclede” or “Company”), and submits its Statement of Position on the issues in the above captioned case. Laclede’s positions are presented in the same order as the List of Issues previously submitted by the parties.

1. Laclede takes no position on Issues 1-9 at this time.
2. Issue 10: Should the Stipulation and Agreement filed by Ameren Missouri and Laclede Gas Company on May 11, 2012 be approved?

Position: Laclede asserts that the Commission should approve the Stipulation and Agreement (“Agreement”) filed by Ameren Missouri and Laclede Gas Company on May 11, 2012. The Agreement is in the public interest, as it benefits customers of both utilities in two ways. First, the Agreement benefits customers by encouraging the utilities to work together on energy efficiency programs where joint programs are feasible and beneficial to customers. Second, the Agreement benefits customers by ensuring that neither utility will design programs that may lead to load building or fuel switching, absent Commission approval. This provision assures consumers who pay for the costs of energy efficiency programs that their funds are being used to promote energy efficiency and not utility sales or market share. At the

same time, both utilities are free to propose fuel switching programs. This preserves the option of having a fuel switching program in Missouri should it be demonstrated that for certain applications, one fuel source is preferable over another.

The Agreement provides benefits and assurances to consumers while preserving regulatory flexibility. It has no objectionable or even controversial terms. The Commission has ample reasons to approve the Agreement and no reasons to reject it. Therefore, Laclede requests that the Commission approve the Agreement.

3. Laclede takes no position on Issue 11 at this time.

WHEREFORE, Laclede Gas Company respectfully requests that the Commission accept this Statement of Position.

Respectfully submitted,

/s/ Rick Zucker

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ATTORNEYS FOR LACLEDE GAS
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Certificate of Service

The undersigned certifies that a true and correct copy of the foregoing pleading was served on the parties to this case on this 18th day of May, 2011, by hand-delivery, e-mail, fax, or by United States mail, postage prepaid.

/s/ Rick Zucker