

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

In the Matter of Union Electric Company )	
d/b/a Ameren Missouri's Filing for )	File No. GT-2013-0383
Commission Approval of its Home )	Tracking No. YG-2013-0350
Energy Performance Tariff )	

**MISSOURI DEPARTMENT OF NATURAL RESOURCES'  
RECOMMENDATION IN SUPPORT OF TARIFF**

COMES NOW the Missouri Department of Natural Resources ("MDNR"), by and through counsel, and submits this Recommendation in Support of Union Electric Company d/b/a Ameren Missouri's ("Ameren") filed tariff establishing a new energy efficiency initiative, the "Home Energy Performance" (HEP) Pilot.

1. The MDNR was an intervenor in Ameren's past general rate case, Filing GR-2010-0363 and is a member of the Energy Efficiency Advisory Group ("EEAG") as set forth in the Missouri Public Service Commission's ("Commission") Report and Order, effective January 29, 2011.

2. The proposed tariff sheets will add a new energy efficiency Pilot Program, the Home Energy Performance Pilot (HEP), to Ameren's portfolio of natural gas energy efficiency programs. The purpose of the HEP is to identify and implement both natural gas and electric energy saving measures identified in an energy audit as being cost effective; and, perform a post-implementation evaluation of the installed measures and the

program. The HEP will be available to residential customers where Ameren provides both electric and natural gas services, which allows the rebates offered to customers to be partially paid by Ameren's electric energy efficiency program and partially paid by Ameren's natural gas energy efficiency program.

3. Ameren's electric HEP was one of the energy efficiency programs included in Ameren's Missouri Energy Efficiency Investment Act ("MEEIA") filing in File No. EO-2012-0142, and was approved by the Commission as a compliance tariff sheet in Ameren's most recent general rate case, File No. ER-2012-0166. The electric HEP will begin on March 1, 2013. Ameren has requested expedited treatment to allow the electric and natural gas HEP pilot programs to be simultaneously implemented on March 1, 2013. Ameren requested expedited treatment of the gas tariff to allow this tariff to take effect two days prior to the standard 30-day effective date of March 3, 2013.

4. Additionally, this natural gas program modifies existing ceiling insulation measure qualifications, 1) as a stand-alone rebate measure, and 2) under the Residential Home Energy Audit Improvement program.

5. MDNR has actively participated in EEAG discussions addressing this filing and supports the implementation of the proposed energy efficiency programs by Ameren.

**WHEREFORE**, the MDNR respectfully recommends the Commission issue an Order approving the proposed tariff sheets, as filed on February 1, 2013, to go into effect on an expedited basis on March 1, 2013.

Respectfully submitted,

**CHRIS KOSTER**  
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**Attorney for Missouri Department  
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**CERTIFICATE OF SERVICE**

I hereby certify that copies of the foregoing have been served electronically on all counsel of record this 14th day of February 2013.

*/s/ Jennifer S. Frazier*  
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