

**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 Regulatory)
Changes in Furtherance of Energy Efficiency as) **Case No. EO-2012-0142**
Allowed by MEEIA.)

**PUBLIC COUNSEL’S LIST OF ISSUES,
ORDER OF WITNESSES, AND ORDER OF CROSS**

COMES NOW the Office of the Public Counsel (“Public Counsel”) and submits the following list of issues, order of witnesses, and order of cross:

List of issues:

Public Counsel provides this *List of Issues* as the questions that need to be determined by the Commission in this action. Counsel for the Staff of the Missouri Public Service Commission (“Staff”) and Union Electric Company d/b/a Ameren Missouri (“Ameren Missouri”) have indicated their agreement on issues 1 and 2. Public Counsel is also in agreement that those two issues are the primary questions. However, disputes exist with respect to the sub-issues listed in this document the resolution of which Public Counsel believes provide the basis on which the Commission can make a determination as to the two main issues, and so, Public Counsel provides this list.

- Issue 1: What is the PY2013 annual energy savings attributable to Ameren Missouri’s energy efficiency programs?
- A. Should the Commission adopt the evaluators’ free rider estimates for Ameren’s Energy efficiency programs?
 - B. Should the Commission adopt the auditor’s participant spillover adjustment for the LightSavers program?
 - C. Should the Commission adopt the evaluator’s non-participant spillover estimates?
 - D. Should the Commission adopt a market effects adjustment for the residential LightSavers program?

E. Should the Commission adopt a rebound effect adjustment for the residential LightSavers program?

Issue 2: What is the PY2013 annual net benefits amount for Ameren Missouri's energy efficiency program?

A. Should the total resource cost test be used when calculating the annual net shared benefits amount?

B. Should the performance incentive be included in the net benefits calculation?

Order of witnesses:

Public Counsel proposes an order of witnesses different than that proposed by Staff and Ameren Missouri. The Company has the burden in this case, thus the presentation of the case should begin with Ameren's witness. Public Counsel proposes the following order of witnesses:

Ameren Missouri's Witness:

Richard Voytas

Staff's Witness:

John Rogers

Public Counsel's Witness:

Geoff Marke

Order of cross examination:

Ameren Missouri's Witness	Staff's Witness	Public Counsel's Witness
Staff	Ameren Missouri	Ameren Missouri
Public Counsel	Public Counsel	Staff

WHEREFORE, the Office of the Public Counsel respectfully requests that the Commission will accept this list of issues, order of witnesses, and order of cross.

Respectfully,

OFFICE OF THE PUBLIC COUNSEL

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CERTIFICATE OF SERVICE

I hereby certify that copies of the foregoing have been mailed, emailed or hand-delivered to all counsel of record this 15th day of December 2014:

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