

**Sundermeyer, Susan**

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**From:** Rogers, John  
**Sent:** Monday, August 03, 2009 7:55 AM  
**To:** Sundermeyer, Susan  
**Cc:** Mantle, Lena  
**Subject:** FW: Possible DSM Rule Objectives

Susan:

Please file the forwarded email from Rick Voytas in EW-2009-0412.

Thanks,

John

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**From:** Voytas, Rick A [mailto:RVoytas@ameren.com]  
**Sent:** Friday, July 31, 2009 3:17 PM  
**To:** Rogers, John  
**Cc:** Michels, Matt R; Arora, Ajay K; Laurent, Dan G  
**Subject:** Possible DSM Rule Objectives

John,

Per your request at today's IRP workshop, attached are some preliminary thoughts on possible objectives for robust DSM rules. I should use a standard disclaimer that these perspectives have not been thoroughly vetted within AmerenUE due to the very rapid pace of the Missouri IRP rule revision process and the request for input now.

Generally speaking, I think of the term "objective" as either the goal or purpose of, in this case, the Missouri DSM rules.

If I had to propose a one sentence description of a single, overall, sustainable objective for DSM rules in the Missouri electric utility planning environment, the objective would be:

Consistent investment in innovation and a well-balanced portfolio of demand-side activities, combined with forward-thinking policy initiatives will be a catalyst to the transformation of the market for energy services.

In my mind, every word in this sentence is meaningful and true and provides a high level roadmap for the development of ensuing DSM rules.

If I had to propose DSM rule objectives with a bit more granularity, the objectives would have the following components:

- Development of a comprehensive DSM potential study
- Indicative DSM supply curve estimates over the 20-year planning horizon of the costs to achieve various levels of long-term load reductions
- Innovative but flexible DSM program designs that can be adjusted in real time to adjust to market conditions
- Identification of program components designed to foster customer energy consumption behavior change
- Development of the infrastructure to encourage utility investment in DSM

- Identification of efforts to promote institutional (state and local law) changes to state level building codes and appliance standards that improve energy efficiency
- Development of cutting edge DSM technology and an approach to DSM R&D

Other thoughts – EM&V is important – no question. Should an objective of the rule be to prescribe how EM&V is done? My thought is that it should not. Rather, it may be more appropriate for Staff and/or stakeholders to develop protocols outside the rule that govern the development of EM&V planning.

How important is it to include “best practices” in the DSM rule objectives? The way we consider best practices, and the term is somewhat overused, is in terms of one of the methods that we have to mitigate DSM program risk – specifically program performance risk. Should a significant goal or purpose of the DSM rule be to evaluate, discuss, document best practices? Compared to the list of objectives stated above, it may rank towards the bottom of the list – strictly my opinion.

Thank you for considering this perspective. Please do not hesitate to call if you would like to discuss further.

Rick Voytas



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