

**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) File No. EO-2012-0142
Furtherance of Energy Efficiency as Allowed by MEEIA.)

NON-UNANIMOUS STIPULATION AND AGREEMENT

COMES NOW Union Electric Company d/b/a Ameren Missouri ("Ameren Missouri"), the Staff of the Missouri Public Service Commission ("Staff"), the Department of Economic Development – Division of Energy ("DE") and the Office of Public Counsel ("OPC"), (collectively "Parties"), and present this non-unanimous Stipulation and Agreement ("Stipulation") to the Commission for approval and in support thereof respectfully state as follows:

1. On January 20, 2012, Ameren Missouri filed an application under the Missouri Energy Efficiency Investment Act ("MEEIA") and the Commission's MEEIA rules in Case No. EO-2012-0142. On July 5, 2012, Ameren Missouri, together with other parties, submitted to the Commission for approval a Unanimous Stipulation and Agreement ("Stipulation") related to the Company's implementation of MEEIA. The Commission issued an Order approving the Stipulation on August 1, 2012 and as amended on December 19, 2012.

2. Pursuant to the Stipulation, the signatories to the Stipulation agreed that Ameren Missouri's three-year, demand-side program plan (the "Plan") consists of the 11 demand-side programs ("MEEIA Programs") described in Ameren Missouri's January 20, 2012 MEEIA Report, the demand-side programs investment mechanism ("DSIM") described in the MEEIA Report, modified to reflect the terms and conditions in the Stipulation, and the Technical

Resource Manual ("TRM") attached as Appendix A to the surrebuttal testimony of Ameren Missouri witness Richard A. Voytas.

3. The Plan excluded all measures with T-12 as a baseline from its portfolio. At the time the Plan was approved, new July, 2012 federal regulations required any newly manufactured T-12 bulbs meet higher efficiency standards, and it was not expected at the time of the Plan's approval that any newly manufactured T-12 bulbs would be able to meet the higher efficiency standards. Thus, measures with T-12 as a baseline were not provided for in the Plan and standard efficiency T-8 bulbs were established as the baseline.

4. However, T-12 lighting linear fixtures remain in significant inventory and are available commercially. Further, current market conditions and the Plan's baseline of standard efficiency T-8 bulbs do not encourage the replacement of inefficient T-12 systems due to relatively long payback periods. Customers are not likely to undertake retrofit activity due to the relatively high cost without any incentive offered, and accordingly, many T-12 systems will remain in place. Ameren Missouri and its business programs contractor, Lockheed Martin, have determined that cost-effective savings can be obtained by offering an incentive for a measure with T-12 as the baseline. Additionally, Ameren Missouri has conferred with Staff, DE, and OPC and each party agrees that a T-12 replacement measure for commercial customers should be made available as a measure to be offered for a period of time not to exceed six months.

5. The Parties agree that measures with a T-12 baseline are appropriate for the six-month time frame. Accordingly, Ameren Missouri will update its Commercial and Industrial Custom Incentive Program to reflect the baseline used for claiming savings for the early retirement ("retrofit") of existing T-12 linear fluorescent lighting systems to premium T-8 linear fluorescent lighting fixtures (or any equally or more efficient lighting technology) for a six-

month period beginning October 15, 2014 and ending April 15, 2015. In program year 2015, after expiration of the six-month time period, and for the remaining measure lifetime, for the purpose of calculating net shared benefits, lost margins, and the performance incentive, the baseline used for the T-12 retrofits will be increased to an efficiency equivalent to a standard efficiency T-8 linear fluorescent lighting system. However, if the replaced system is known and is more efficient than a standard T-8 system, then actual replaced technology will be used as a baseline.

6. The Parties agree that the Plan should now include and allow for the T-12 replacement measure for the period October 15, 2014 through April 15, 2015, as described above. Upon implementing the T-12 replacement measure, Ameren Missouri will continue to keep all other Parties apprised of the measure's progress as it is implemented.

7. Parties to this proceeding have been apprised of this Stipulation by e-mail to all Counsel of Record. The following parties have stated they do not object: Missouri Industrial Electric Consumers, Sierra Club, Barnes-Jewish Hospital, Laclede Gas Company, and Kansas City Power and Light Company. To date, the Sierra Club, NRDC, and Renew Missouri have not expressed any intent to object, however, they have not affirmatively stated that they will refrain from objecting.

WHEREFORE, the Parties respectfully request that the Commission approve this Stipulation, allow related modification to the Plan, and grant any other and further relief as it deems just and equitable.

Respectfully submitted,

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CERTIFICATE OF SERVICE

I do hereby certify that a true and correct copy of the foregoing document has been hand-delivered, transmitted by e-mail or mailed, First Class, postage prepaid, this 23rd day of September, 2014, to counsel for all parties on the Commission's service list in this case.

/s/ Matthew R. Tomc