

BEFORE THE PUBLIC SERVICE COMMISSION
OF THE STATE OF MISSOURI

In the Matter of Union Electric Company d/b/a)
Ameren Missouri’s 2nd Filing to Implement) **File No. EO-2015-0055**
Regulatory Changes in Furtherance of Energy)
Efficiency as Allowed by MEEIA)

**LATE-FILED AMENDED JOINT
STATEMENT OF POSITION OF NHT AND TGNCDC**

COME NOW the National Housing Trust (“NHT”) and Tower Grove Neighborhoods Community Development Corporation (TGNCDC), by and through the undersigned counsel, pursuant to the Missouri Public Service Commission’s (“Commission”) July 8, 2015 *Order Directing Filing*, and hereby submit their Late-Filed Amended Joint Statement of Position in the above-captioned case. NHT and TGNCDC filed their initial Joint Statement of Position on May 11, 2015. Since then, parties have engaged in various settlement discussions, which have produced two separate Non-Unanimous Stipulation and Agreement documents, one filed by Ameren Missouri and agreed to by several parties (the “Ameren Stipulation”), and one filed by the Office of Public Counsel and PSC Staff and agreed to by several parties (the “Non-utility Stipulation”).¹ Because parties have filed timely objections to both, the stipulations are treated as non-binding joint positions of the signatory parties, and all issues remain for determination after hearing. Commission Rule 4 CSR 240-2.115(2)(D).

NHT and TGNCDC are signatories to neither Stipulation, although they were involved in discussions regarding the development of provisions affecting the Multifamily Low-Income

¹ See Non-Unanimous Stipulation and Agreement (filed June 30, 2015) and Amended Non-Unanimous Stipulation and Agreement Regarding Ameren Missouri’s MEEIA Cycle 2 (originally filed July 7, 2015, amended on July 8, 2015). Signatories to the Ameren Stipulation include Ameren, Missouri Department of Economic Development – Division of Energy, Kansas City Power and Light Company (“KCP&L”) and KCP&L Greater Missouri Operations Company, Natural Resources Defense Council (“NRDC”), and United for Missouri, Inc. Signatories to the Non-Utility Stipulation include Staff, the Office of the Public Counsel (“OPC”), Midwest Energy Consumers’ Group, the Missouri Industrial Energy Consumers, and Renew Missouri.

program found in both Stipulations. NHT and TGNCCDC are concerned primarily with the Multifamily Low-Income program and do not have strong positions on issues such as the DSIM, the Performance Incentive, or other central issues in this case. Accordingly, NHT and Tower Grove have refrained from signing on to one Stipulation or the other.

1. Should the Commission approve, reject or modify Ameren Missouri's MEEIA Cycle 2 Plan (hereafter the "Plan")?

At a minimum, the Commission should modify Ameren Missouri's Cycle 2 Plan to include a Multifamily Low-Income program according to the program details on which both Stipulations agree. This includes an increased budget to \$10.75 million, a single point of contact or "one-stop-shop" Coordinator, expanded program eligibility, a 25% bonus incentive, and other program details shared between the two Stipulations.

NHT and TGNCCDC also support additional program details found in the Non-Utility Stipulation that would represent improvements to the Multifamily Low-Income program. These program details include: (1) applicability of the 25% bonus incentive to measures serving the Company's 1(M) customer classification; and (2) the inclusion of estimated measure cost information in energy audit reports, as per standard industry practice.

2. Do the programs in the Plan, and associated incremental energy and demand savings, demonstrate progress toward achieving all cost-effective demand-side savings consistent with state policy (as established by MEEIA)?

NHT and TGNCCDC believe that the Multifamily Low-Income programs included in both Stipulations demonstrates significant progress toward achieving all cost-effective savings in this area. Both Stipulations have expanded program eligibility and included provisions for a single point of contact program Coordinator position, or so-called "One Stop Shop." While the parties believe that further savings potential may exist for this program, NHT and TGNCCDC consider the added program details in both Stipulations to reflect important improvements to Ameren

Missouri's Low-Income program as originally filed.

3. If the Commission approves a Plan, what are the components of the demand-side programs investment mechanism and how will each of the components be administered?

NHT and TGN CDC take no position on this issue, but reserve the right to give input at a later time.

4. If the Commission approves a Plan, what variances from Commission rules based on a showing of good cause are necessary?

NHT and TGN CDC take no further position on this issue, but reserve the right to give input at a later time.

Office of the Public Counsel's Issues:

1. If the Commission approves a plan, should the total resource cost test be applied uniformly when calculating net shared benefits?

NHT and TGN CDC take no position on this issue, but reserve the right to give input at a later time.

2. If the Commission approves a demand-side programs investment mechanism that includes a performance incentive, should the performance incentive be included as a cost when calculating the net shared benefits?

NHT and TGN CDC take no position on this issue, but reserve the right to give input at a later time.

Sierra Club's Issue:

1. In assessing the cost-effectiveness of demand-side programs, should Ameren Missouri consider the results of the utility cost test?

NHT and Tower Grove take no position on this issue, but reserve the right to give input at a later time.

Missouri Division of Energy's Issue:

1. If the Commission modifies Ameren Missouri's MEEIA Cycle 2 Plan what modifications should the Commission adopt?

Please refer to the general question #1 above, "Should the Commission approve, reject or modify Ameren Missouri's MEEIA Cycle 2 Plan (hereafter the "Plan")?" where NHT and TGNCCDC believe they have addressed this question.

Respectfully Submitted,

/s/ Andrew J. Linhares

Andrew J. Linhares, #63973

910 E. Broadway, Ste. 205

Columbia, MO 65203

andrew@renewmo.org

(314) 471-9973 (T)

(314) 558-8450 (F)

ATTORNEY FOR THE NATIONAL
HOUSING TRUST AND TOWER GROVE
NEIGHBORHOODS COMMUNITY
DEVELOPMENT CORPORATION

CERTIFICATE OF SERVICE

I hereby certify that a true and correct PDF version of the foregoing was filed on EFIS and electronically mailed to all counsel of record on this 17th day of July, 2015.

/s/ Andrew J. Linhares

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