

**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)
Regulatory Changes in Furtherance of Energy) File No. EO-2015-0055
Efficiency as Allowed by MEEIA)

**RENEW MISSOURI’S OBJECTION TO JUNE 30, 2015
NON-UNANIMOUS STIPULATION AND AGREEMENT**

COMES NOW Earth Island Institute d/b/a Renew Missouri (“Renew Missouri”), pursuant to Commission Rule 4 CSR 240-2.115(2)(B), and files its objection to the Non Unanimous Stipulation and Agreement filed on June 30, 2015 by Union Electric Company d/b/a Ameren Missouri (“Ameren Missouri”), Missouri Department of Economic Development – Division of Energy (“DE”), Natural Resources Defense Council (“NRDC”), Kansas City Power and Light Company (“KCPL”), and United for Missouri, Inc. (“UFM”). In support of its objection, Renew Missouri states:

1. On June 30, 2015, Ameren Missouri filed its Stipulation (“Ameren Stipulation”). On July 2, 2015, the Staff for the Commission filed its objection to the Ameren Stipulation. By Commission rule: “[a] non-unanimous stipulation and agreement to which a timely objection has been filed shall be considered to be merely a position of the signatory parties to the stipulated position, except that no party shall be bound by it. All issues shall remain for determination after hearing.” 4 CSR 240-2.115(2)(D).

2. Renew Missouri has reviewed the Staff Objection to Non-Unanimous Stipulation and Agreement filed on July 2, 2015, and agrees with the reasoning contained in the Staff’s objection.

3. In addition to Staff’s reasons for opposing the Ameren Stipulation, Renew Missouri believes that the savings goals in the Ameren Stipulation fall significantly short of what

is a realistically achievable amount of energy savings in Ameren Missouri's service territory for 2016-2018, especially when compared to what other large investor-owned utilities have achieved in nearly every region of the country. As put forth in the testimony of the Natural Resources Defense Counsel, the Sierra Club, and the Office of Public Counsel, Ameren's low savings target is driven in large part by flawed assumptions related to customer participation rates.

4. The MEEIA statute allows utilities the opportunity to not only recover all of their lost revenues but reap significant profits as well, one of the most lucrative incentive mechanisms in the nation. Renew Missouri believes that if our state is going to offer utilities such a windfall merely for pursuing the least-cost resource, we should only use the MEEIA statute to incent utilities to achieve significant, verifiable energy and demand savings so as to avoid the need for future fossil-fuel generation and maximize savings to ratepayers. Instead, Ameren asks the Commission to approve a Plan that deems the majority of savings without proper evaluation, fails to capture deep savings through whole building approaches, and includes no meaningful strategies or measures to permanently reduce demand.

WHEREFORE, Renew Missouri respectfully files its objection to Ameren Missouri's Non-Unanimous Stipulation and Agreement.

Respectfully submitted,

/s/ Andrew J. Linhares

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CERTIFICATE OF SERVICE

I do hereby certify that a true and correct copy of the foregoing document has been electronically mailed this 7th day of July, 2015 to all counsel of record in this proceeding.

/s/ Andrew J. Linhares

Andrew J. Linhares