

**BEFORE THE PUBLIC SERVICE COMMISSION
OF THE STATE OF MISSOURI**

Ameren Missouri's Request for Variance)
For Its 2016 Demand-Side Management) Case No. EE-2016-
Pursuant to 4 CSR 240 – Chapter 3.)

REQUEST FOR VARIANCE

COMES NOW Union Electric Company d/b/a Ameren Missouri (Ameren Missouri or the Company) and, pursuant to 4 CSR 240-3.164(6), hereby requests a variance from certain portions of the Missouri Public Service Commission's (Commission) Demand-Side Programs (DSM) rules and, in support of its variance request, states as follows:

1. Ameren Missouri is in the process of performing its 2016 DSM Potential study, which is expected to be used as the basis for demand-side planning inputs for the 2017 Ameren Missouri Integrated Resource Plan (IRP). The study is also intended to be used in Ameren Missouri's expected MEEIA Cycle 3 filing in 2017. The previous study was completed in December of 2013, and an earlier study was completed in January of 2010.

2. 4 CSR 240-3.164(2)(A) requires updating the current market potential study with primary data and analysis no less frequently than every four (4) years. Since the 2016 DSM Potential Study would not be repeated until at least 2019, this requirement, unless a variance is granted, would apply to the 2016 study. For the reasons set forth below, good cause exists to grant a variance of this requirement for the 2016 study.

3. As background, both of the prior studies included significant primary market data research, which contributed to approximately 50% of the prior studies' approximately \$1 million budgets and which also consumed about half of the prior studies' approximately 12-month study periods.

4. Because of this prior work, Ameren Missouri already has ample primary research information about electric end-use saturations, customer demographics and customer psychographics, all of which can be used as inputs to the 2016 DSM Potential Study. Moreover, since 2010, Ameren Missouri has five years of individual energy efficiency program evaluation, measurement and verification (EM&V) impact and process evaluation reports with an abundance of data on customers, trade allies, home inventory analyses, business stocking practices, etc., which are all viable substitutes – to some degree – for additional primary market research activities. Prior DSM Potential studies also included extensive primary market research on customer psychographics or customers’ willingness and ability to participate in utility energy efficiency programs.

5. Based in part on discussions with its DSM regulatory stakeholders who have expressed interest in reducing the study budget, Ameren Missouri is requesting this variance to eliminate (or at least significantly reduce) the need to update the 2016 DSM Potential Study by generating yet additional primary market research data at this time. Instead, the 2016 Study will utilize the above-described information that has already been obtained through prior research and actual experience.

6. Ameren Missouri has discussed this request with the Commission Staff, which has indicated that it is supportive of a variance of the cited rule for the 2016 DSM Potential Study.

WHEREFORE, Ameren Missouri requests the Missouri Public Service Commission approve a variance from the requirement in 4 CSR 240-3.164(2)(A) with respect to the 2016 DSM Market Potential Study.

Respectfully submitted,

/s/ Wendy K. Tatro

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**ATTORNEYS FOR UNION ELECTRIC
COMPANY d/b/a AMEREN MISSOURI**

CERTIFICATE OF SERVICE

I hereby certify that copies of the foregoing have been mailed, hand-delivered, transmitted by facsimile or electronically mailed to all parties of record to this case on this 27th day of May, 2016.

Wendy K. Tatro

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