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

In the Matter of Union Electric Company d/b/a Ameren)Missouri's Tariff Filing to Implement Changes to Its)File No. ET-2012-0011Electric Energy Efficiency Programs.)

## **Request for Approval of Residential Electric Energy Efficiency Bridge Tariffs**

COMES NOW Union Electric Company d/b/a Ameren Missouri (Ameren Missouri or Company) and, for its Request for Approval of Residential Electric Energy Efficiency Bridge Tariffs, states as follows.

1. On July 8, 2011, Ameren Missouri filed a 60 day notice in this case, indicating it would be filing for a revision of its electric energy efficiency programs. The notice was for all of its electric energy efficiency programs, residential and business.

2. Concurrent with the filing of this pleading, the Company is filing new residential energy efficiency program tariffs. The Company anticipates making a separate filing for its business energy efficiency program at a later date and asks the Missouri Public Service Commission (Commission) to consider the notice filed on July 8, 2011, to be in effect until the new business tariffs are filed, even though that filing will likely occur in a separate case.

3. The tariffs filed today are designed to bridge the gap between the expiration of the Company's former energy efficiency programs (which expired on September 30, 2011) and when the Commission issues an order on the Company's Missouri Energy Efficiency Investment Act (MEEIA) filing.

4. The Company hopes to make its MEEIA filing during the first quarter of 2012. That filing will present the Commission with the regulatory framework necessary to value demand-side investments equal to traditional investments in supply and delivery infrastructure so that Ameren Missouri may continue to pursue energy efficiency.

5. The bridge programs are designed to continue to offer energy efficiency benefits to customers and maintain a sufficient portion of the Company's energy efficiency infrastructure so that implementation of its programs after the MEEIA filing is not unduly delayed while addressing the very real negative impact of the throughput disincentive upon the Company, as was acknowledged in the Commission's Report and Order in Case No. ER-2011-0028.

WHEREFORE, for the reasons detailed above, Ameren Missouri respectfully requests the Commission approve the Company's energy efficiency bridge tariffs filed concurrent with this pleading.

Respectfully submitted,

UNION ELECTRIC COMPANY, d/b/a Ameren Missouri

## Is Wendy K. Tatro

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## **CERTIFICATE OF SERVICE**

The undersigned certifies that true and correct copies of the foregoing have been e-mailed or mailed, via first-class United States Mail, postage pre-paid, to the service list of record this 25<sup>th</sup> day of October, 2011.

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