## 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.	)	

## AMEREN MISSOURI'S REQUEST FOR FINAL DETERMINATION

**COMES NOW** Union Electric Company d/b/a Ameren Missouri (Ameren Missouri or Company), and requests that the Commission consider its pending MEEIA Cycle 2 Application as soon as possible, and in support thereof, states as follows:

Counsel for Ameren Missouri has been advised that there may no longer be adequate time to implement programs in time for an effective 2016 roll out, a goal which is important for creating a sustainable, long-term energy efficiency effort. Further delay may render the goals agreed to by Ameren Missouri moot due to the truncated time frame under which to complete the programs. Specifically, being unable to offer HVAC programs in spring of 2016 is a significant concern. For their own planning purposes, the Company's customers and Trade Allies need to know about the future availability of energy efficiency programs. Ameren Missouri is additionally concerned that contractors currently relied upon to implement the programs will move to other markets, which may already be occurring. Therefore, Ameren Missouri respectfully requests that the Commission set the matter for determination at the next agenda session scheduled for Thursday, October 22, 2015. It should be noted that in the event of approval, the Company may still be required to seek leave to amend the Plan to provide additional time or make other alterations to the Plan in order to ensure that the Company actually has an opportunity to meet the agreed upon Kwh goal.

Pursuant to the Commission's rules, a MEEIA application must be ruled upon within 120 days of its filing. When it initially filed this case, Ameren Missouri voluntarily waived that time

frame in order to seek a universal settlement with all parties. Then, as part of attempts to resolve this case, Ameren Missouri agreed to several additional extensions. After much effort, settlement has been achieved with the majority of the parties to the case, but among those remaining opposing parties, a settlement is clearly not possible.

WHEREFORE, Ameren Missouri requests that the Commission grant relief as articulated herein.

Respectfully submitted,

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## **CERTIFICATE OF SERVICE**

The undersigned certifies that a true and correct copy of the foregoing document was sent by electronic transmission, facsimile or email to counsel for parties in this case on this  $20^{th}$  day of October, 2015.

/s/ Matthew R. Tomc