

2. The Company's MEEIA plan for its 2016-2018 ("Cycle II") in its MEEIA Cycle II 2016-2018 Filing (the "Filing") filed on August 28, 2015 and revised by the Stipulation fails to meet the statutory requirements of Section 393.1075.

3. Section 4(a)(i) of the Stipulation asks the Commission to approve the Company's proposals for Non-Residential/Business Programs, including Business Efficiency Rebate-Custom (the "Custom Rebate Program"). The Company's proposal will change the Custom Rebate Program from its current form to a flat \$/kWh incentive rate.¹ The Company proposes to make that rate a flat 10 cent per kWh rebate based on first-year savings.²

4. This change to the Custom Rebate Program will result in higher payback times for potential investors, and thereby drastically lower participation, lost opportunities to generate efficiency savings in Cycle II and an inability to meet overall savings goals.

5. The Company also asks the Commission to allow the ability to discontinue all approved programs during the MEEIA II Cycle.³ The Company can commit to having an efficiency program, or it can decline to implement an efficiency program, but if the Commission approves the Filing, the Company must be held to the financial and savings commitments it has made. Setting a precedent that a utility can simply pull the plug on its obligations will have detrimental effects on its ratepayers and the businesses operating in the Company's footprint.

6. As a result of the policy changes noted in this Objection, the Company's plan does not make meaningful movement of its demand-side programs toward the goal of achieving all cost-effective demand-side savings in a way that is beneficial to all customers in the customer

¹ Page 7, Table 1-4 of the Filing.

² Appendix A, page A-25 of the Filing

³ Stipulation, page 18, Section 13, "Regulatory Flexibility"

class in which the programs are proposed, regardless of whether the programs are used by all customers.

7. Brightergy will provide a more detailed explanation of its concerns in its responsive testimony.

WHEREAS, Brightergy files its Objection to the Company's Stipulation as provided by Commission rule.

Dated November 30, 2015

Respectfully submitted,

/s/ Andrew J. Zellers

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CERTIFICATE OF SERVICE

I do hereby certify that a true and correct copy of the foregoing document has been emailed this 30th day of November, 2015, to all parties on the Commission's service list in this docket.

/s/ Andrew J. Zellers