

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

In the Matter of Union Electric Company d/b/a            )  
Ameren Missouri's 2<sup>nd</sup> Filing to Implement            )        File No. EO-2015-0055  
Regulatory Changes in Furtherance of Energy        )  
Efficiency as Allowed by MEEIA                        )

**UNITED FOR MISSOURI'S REPLY TO AMEREN MISSOURI'S RESPONSE TO  
COMMISSION ORDER**

**COMES NOW** United for Missouri, Inc. ("UFM"), and, in reply to *Ameren Missouri's Response to Commission Order* ("*Ameren Missouri's Response*"), states as follows:

1.       On September 9, 2015, the Missouri Public Service Commission ("Commission") issued its *Order Directing Filing*, stating that the commissioners had objections to the non-unanimous stipulation filed by Ameren Missouri and other parties on June 30, 2015.

2.       On September 15, 2015, Ameren Missouri filed its *Ameren Missouri's Response*, in which it described its position on three additional modifications to its non-unanimous stipulation in response to the Commission's *Order Directing Filing*.

3.       Despite the route taken to achieve this result, UFM supports Ameren Missouri's Response to the Commission's *Order Directing Filing*.

4.       UFM pointed out in its *Initial Brief* in this case that the MEEIA<sup>1</sup> process is not conducive to producing economically efficient transactions. Rather than negotiating with individuals and entities that are the true parties in interest, the ones that can make the correct call on the economic value of energy efficiency services, the customer, Ameren Missouri negotiates with stakeholders. Now Ameren Missouri is also negotiating with the Commission itself.

---

<sup>1</sup> The Missouri Energy Efficiency Investment Act, Section 393.1075, RSMo.

5. That having been said, under the MEEIA process, Ameren Missouri has complied with MEEIA's terms. First, the proposal has "a goal of achieving all cost-effective demand-side savings."<sup>2</sup> Second, the cost recovery proposal "result[s] in energy and demand savings and [is] beneficial to all customers in the customer class in which the programs are proposed, regardless of whether the programs are utilized by all customers."<sup>3</sup> The additional terms proposed in *Ameren Missouri's Response* merely tighten up what Ameren Missouri will get paid for its services. Whether this is a good thing or not for producing economically efficient transactions is unclear. What is clear is that it is good for regulation under MEEIA.

6. UFM suggests it is time to truly evaluate the MEEIA regulations in light of recent events. The MEEIA regulations should be restructured to, as much as possible, interject true price signals into energy efficiency services. Utility companies, along with other providers of efficiency services, should be able to set prices for efficiency services and charge customers for those services. Only then will the true beneficiary of energy efficiency service, the customer, be able to make the call on the value of the service. UFM proposes that the Commission identify such considerations for the Ameren Missouri workshops proposed in the *Ameren Missouri Response*.

WHEREFORE, UFM respectfully files its *Reply to Ameren Missouri's Response to Commission Order* and requests that the Commission approve Ameren Missouri's non-unanimous stipulation as modified by *Ameren Missouri's Response to Commission Order* filed September 25, 2015, and the recommendation made herein.

---

<sup>2</sup> Section 393.1075.4.

<sup>3</sup> *Id.*

Respectfully submitted,

By: /s/ David C. Linton

David C. Linton, #32198  
314 Romaine Spring View  
Fenton, MO 63026  
Telephone: 314-341-5769  
Email: [jdinton@reagan.com](mailto:jdinton@reagan.com)

Attorney for United for Missouri, Inc.

Filed: September 29, 2015

#### CERTIFICATE OF SERVICE

I hereby certify that a true copy of the foregoing was sent to all parties of record via electronic transmission this 29th day of September, 2015.

By: /s/ David C. Linton