

**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.                        )

**POSITION STATEMENT OF UNION ELECTRIC COMPANY  
d/b/a AMEREN MISSOURI**

**COMES NOW**, Union Electric Company d/b/a Ameren Missouri (Ameren Missouri or Company), and for its Statement of Position on the Issues to be determined by the Commission as set forth in the *List of Issues, Order of Opening Statements, Order of Witnesses, and Order of Cross Examination* filed on May 4, 2015 by the Parties in this case, states as follows:

1.        *Should the Commission approve, reject or modify Ameren Missouri's MEEIA Cycle 2 Plan1 (hereafter the "Plan")?* The Commission should approve the Plan as filed. The Plan aligns the interests of Ameren Missouri and its customers in advancing beneficial demand-side programs. The Plan is well supported by the evidentiary record and was developed in coordination with the Company's Integrated Resource Plan (IRP). Accordingly, adoption of the Plan satisfies the policy goal of the State to value demand-side investments equal to traditional investments in supply and delivery infrastructure.

2.        *Do the programs in the Plan, and associated incremental energy and demand savings, demonstrate progress toward achieving all cost-effective demand-side savings consistent with state policy (as established by MEEIA)?* Yes. As noted above, the Plan was developed in coordination with the IRP. As the evidence demonstrates, the Plan provides a cost-effective, demand-side resource for meeting projected customer load requirements. The Plan also enables the Company to mitigate the need for future, additional supply-side resources, of which all customers would be required to pay a portion.

3. *If the Commission approves a Plan, what are the components of the demand-side programs investment mechanism and how will each of the components be administered?*

The Plan as filed provides for a demand-side investment mechanism (DSIM) consistent with Ameren Missouri's existing DSIM. The DSIM is a rider that allows the Company to recover program costs, mitigate any throughput disincentive to energy efficiency, and provides for the possibility of a performance incentive. The DSIM is foundational to the Plan and should be approved because it advances the MEEIA objective of providing utilities with timely cost recovery of energy efficiency-related costs.

4. *If the Commission approves a Plan, what variances from Commission rules based on a showing of good cause are necessary?* The Commission should approve the variances as set forth in the Company's Application and grant any other variances identified through the remainder of the proceeding as necessary to provide for successful implementation of the Plan.

Office of the Public Counsel's Issues:

5. *If the Commission approves a plan, should the total resource cost test be applied uniformly when calculating net shared benefits?* Ameren Missouri does not agree this is an issue for determination in this proceeding.

6. *If the Commission approves a demand-side programs investment mechanism that includes a performance incentive, should the performance incentive be included as a cost when calculating the net shared benefits?* No. The performance incentive is calculated based upon a share of net benefits achieved through successful implementation of energy efficiency programs. Reducing benefits by counting a share of the benefits as a cost is inappropriate and the result of unworkable, circular logic.

Missouri Division of Energy's Issue:

7. *If the Commission modifies Ameren Missouri's MEEIA Cycle 2 Plan what modifications should the Commission adopt?* The Company's position is that the Commission should approve the Plan as filed.

**WHEREFORE**, Ameren Missouri submits its Statement of Position on the Issues.

Respectfully submitted,

/s/ Matthew R. Tomc

**Matthew R. Tomc**, #66571

Corporate Counsel

**Wendy K. Tatro**, #60261

Director and Assistant General Counsel

1901 Chouteau Avenue, MC 1310

P.O. Box 66149

St. Louis, MO 63166-6149

(314) 554-4673 (phone)

(314) 554-3484

(314) 554-4014 (facsimile)

AmerenMOService@Ameren.com

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

**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 11th day of May, 2015.

/s/ Matthew R. Tomc