
Exhibit No.:
Issue: DSIM
Witness: Adam Blake
Type of Exhibit: Rebuttal Testimony
Sponsoring Party: Brightergy, LLC
Case No.: EO-2015-0055
Testimony Date: April 27, 2015

MISSOURI PUBLIC SERVICE COMMISSION

File NO.: EO-2015-0055

REBUTTAL TESTIMONY

OF

ADAM BLAKE

ON BEHALF OF

BRIGHTERGY, LLC

Kansas City, Missouri

April 27, 2015

REBUTTAL TESTIMONY

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ADAM BLAKE

File No. EO-2015-0055

Q: Please state your name and business address.

A: My name is Adam Blake. My business address is 1712 Main Street, 6th Floor, Kansas City, MO 64108.

Q: By whom and in what capacity are you employed?

A: I am the Chief Executive Officer of Brightergy, LLC ("Brightergy"), an energy company offering distributed generation and a variety of energy efficiency services. Brightergy has offices in Kansas City, Missouri, St. Louis, Missouri, and Boston, Massachusetts.

Q: As Chief Executive Officer, what are your responsibilities at Brightergy?

A: I'm responsible for the strategic direction of the company and I manage the executive team that includes managers of sales, marketing, public affairs, regulatory affairs, operations, accounting, and technology. I also oversee our relationships with financial institutions and equity investors.

Q: Have you previously testified in a proceeding at the Missouri Public Service Commission ("MPSC" or "Commission") or before any other utility regulatory agency?

A: I submitted pre-filed Rebuttal Testimony in MPSC Case No. ET-2014-0059 on September 16, 2013, and pre-filed surrebuttal testimony in that same docket on September 24, 2013.

Q: What is the purpose of your Rebuttal Testimony?

A: The purpose of my testimony is to encourage Ameren to set out a more defined program structure for its four business programs. encourage more transparency in how efficiency dollars are being budgeted and spent. and to support Ameren's plan for its efficiency program.

Q: Please describe Brightergy and its presence in the state of Missouri.

A: Brightergy has more than 70 employees among its three offices in Kansas City, Missouri and St. Louis, Missouri, and Boston, Massachusetts. In addition, Brightergy contracts with several Missouri electrical contractors who perform installations of solar systems, lighting retrofits, and other energy efficiency related projects. The employment resulting from these business relationships extends well beyond Brightergy's full-time employees.

Q: Please describe Brightergy's business operations in the state of Missouri.

A: Brightergy assists energy consumers in taking control of their electricity expenditures in a number of ways. To name a few, Brightergy offers residential and commercial solar energy installations, energy efficiency audits and projects, and various energy management services. Brightergy also assists its clients in applying for necessary permits and financial incentive processing including, utility rebates. Brightergy has over 500 commercial clients in the state of Missouri.

Q: Do you support Ameren's efforts to comply with MEEIA's requirements?

A: Yes. Ameren's efforts and compliance plans clearly show the company's dedication to comply with Missouri's public policy encouraging investments in energy efficiency programs. The suggestions I make in this direct testimony are meant to assist the company's implementation with outside perspective from an implementor of energy efficiency.

Q: Do you have suggestions to make the program more effective?

A: Yes. Generally. more transparency in efficiency budgeting and incentive levels. and clearer parameters for the program's goals.

Q: What type of program transparency should Ameren adopt?

A: In its 2016-2018 Report. Ameren notes on several occasions the need for increased program transparency.¹ Ameren's desire for more transparency is well-placed. and could be expanded. Greater transparency into Ameren's incentive levels within specific programs will assist its trade allies in marketing the program and selling specific solutions to allow Ameren to meet its goals. Ameren should make its efficiency budget and incentive amounts available to its trade allies and allow for input as to whether the funds are being effectively targeted. and whether the budget could be increased without impacting the company's profitability.

Q: What are the other benefits Ameren could realize from increased transparency efforts?

A: Another added benefit is greater certainty of compliance with the MEEIA statute. and more certainty that the company will have the capacity to meet the upcoming rules proposed under Section 111(d) of the Clean Air Act.

Q: What benefits could Ameren see from a more clearly defined program structure?

A: Ameren raises the concern that without a program continuity structure. its trade allies could face volatility that could impact jobs in the industry.² More than program continuity though. a more thoroughly defined program structure. with specific incentive levels. would prevent job losses and encourage both hiring and retaining workers.

Q: As a trade ally who hires workers to execute efficiency projects, is it your opinion that program specifications are as important as program continuity?

¹ P. 62. 63. and 73 of Ameren's 2016-2018 Energy Efficiency Plan.

² P. 81 of Ameren's 2016-2018 Energy Efficiency Plan.

A: Yes. A more defined program would give some certainty to the contractors who work with utilities to implement these programs. and encourage more hiring. Extending the program's continuity. as Ameren suggests. would also benefit the overall effectiveness of the program by giving certainty to trade allies not only of what types of projects the program includes. but also that the program will not undergo material changes from year to year. We encourage clear incentive structures along with a transparent process for changing incentive levels that includes stakeholder input.

Q: Are there any possible negative implications for employment if your suggestions are implemented?

A: The only change that would hurt employment in the efficiency industry would be a reduction in specific incentive levels and budget for the program. especially those changes that occur without notice. Abrupt changes to incentive levels without adequate notice often lead to a loss of jobs. On the contrary. efficiency programs with clearly defined incentive levels. along with a transparent process to modify incentive levels. creates a significant amount of Missouri jobs pertaining to energy efficiency.

Q: Overall, do you see Ameren moving in a positive direction in its efficiency efforts?

A: Yes. As a trade ally. we support Ameren's efforts to comply with MEEIA. The suggestions I have made in this testimony are meant to improve a successful program.

Q: Does this conclude your rebuttal testimony?

A: Yes.

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

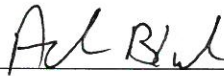
In the Matter of Union Electric Company)
d/b/a Ameren Missouri's 2nd Filing to)
Implement Regulatory Changes in) E0-2015-0055
Furtherance of Energy Efficiency)
as allowed by MEEIA)

AFFIDAVIT OF ADAM BLAKE

STATE OF MISSOURI)
) SS
COUNTY OF JACKSON)

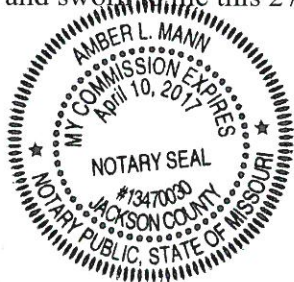
Adam Blake, of lawful age and being first duly sworn, deposes and states:

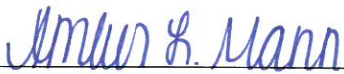
1. My name is Adam Blake. I am Chief Executive Officer for Brightergy, LLC.
2. Attached hereto and made a part hereof for all purposes is my rebuttal testimony.
3. I hereby swear and affirm that my statements contained in the attached affidavit are true and correct to the best of my knowledge and belief.



Adam Blake

Subscribed and sworn to me this 27th day of April 2015.





Amber L. Mann
Notary Public

My commission expires 10 April, 2017.