

The Staff of the Missouri Public Service Commission,

Complainant,

vs.

Union Electric Company d/b/a as Ameren Missouri,

Respondent.

Case No. EC-2015-0315

COMES NOW the Staff of the Missouri Public Service Commission, by and through undersigned counsel, and for its Response, states as follows:

1

2014 IRP avoided costs would be used to value benefits from kWh savings and kW savings which occur during the months of October, 2014 to the end of each measure's life.

2. As sought by Ameren in its request for clarification, using the MEEIA 1 Application avoided costs to value benefits from savings for the months of January – September, 2014 and using the 2014 IRP avoided costs to value benefits from savings for October, 2014 to the end of each measure's life would add complication, EM&V process "rework" and more cost for the EM&V Evaluators and Commission Auditor when performing the Commission-ordered EM&V for measures installed in 2014. This is because all kWh savings and kW savings for 2014 would have to be segregated into January – September 2014 savings and post-September 2014 savings before applying the MEEIA 1 Application avoided costs and the 2014 IRP avoided costs, respectively. Ameren's request for clarification does not provide for any assessment of the additional EM&V costs for the EM&V process "rework" which would be necessary to implement Ameren's requested clarification "that new avoided cost estimates are not to be used except for MWhs saved on and after October 1, 2014..."

WHEREFORE, for the reasons discussed above, Staff recommends that the Commission reject Ameren's application for rehearing and request for clarification.

Respectfully submitted,

/s/ Robert S. Berlin

Robert S. Berlin

Missouri Bar No. 51709

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CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing was served by electronic mail, or First Class United States Postal Mail, postage prepaid, on this 22nd day of December, 2015 to all counsel of record.

/s/ Robert S. Berlin