October 8, 2010

To: Gaye Suggett

From: Rick Voytas

RE: Ameren Missouri Response To KEMA Interim Memo On Baseline Data Dated October 4, 2010

Concerns

1. KEMA did not provide workpapers underlying the memo. This makes it difficult to understand the basis for the information presented in the memo.
2. Apparently KEMA used secondary data to a form to fit their DSM Potential Study model called ASSYST. We have no knowledge of the ASSYST model.
3. The basis of KEMA secondary data collection efforts appears to be the Energy Information Administration's State Energy Data System "SEDS". AmerenUE discovered significant differences between EIA projected end use energy intensities using its own primary data vs. that assumed by EIA. The following graph illustrates the differences. The first graph is based on AmerenUE primary data, while the second is based on EIA secondary data sources. Notice the significant differences in heating, cooling, and miscellaneous end-uses for electricity.

Figure* Error! No text of specified style in document.-1*: Residential Electricity Consumption by End Use, 2008

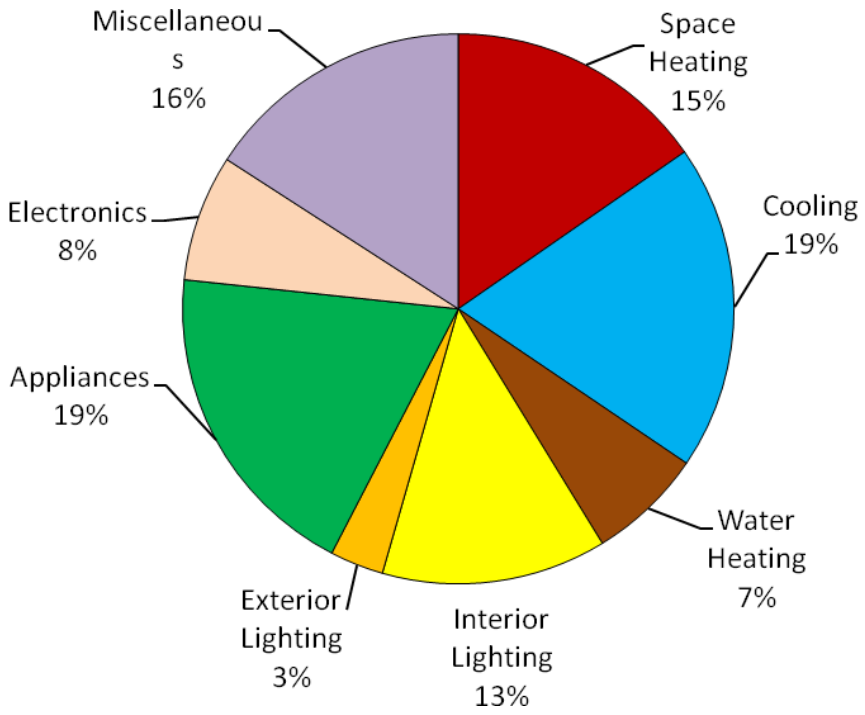
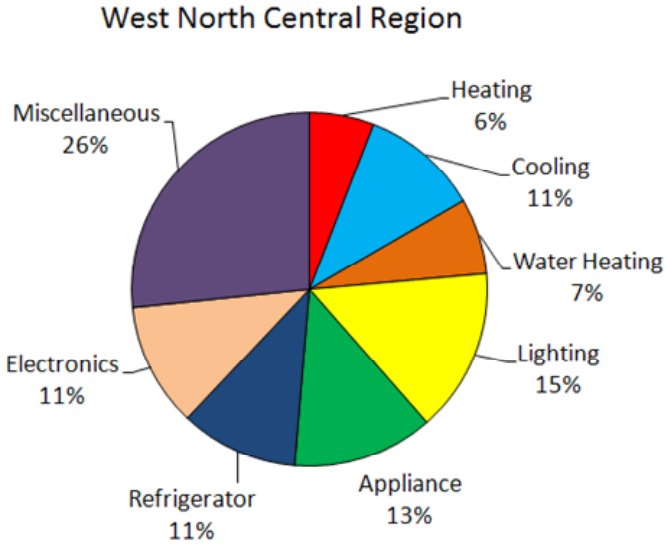
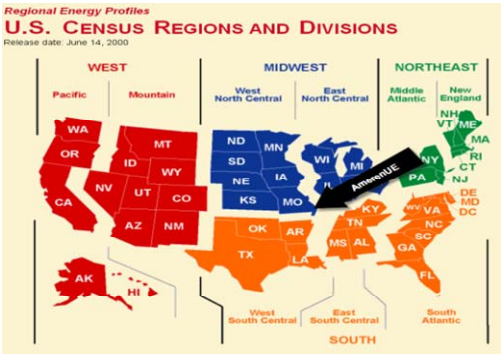


Figure** Error! No text of specified style in document.**-2 Comparison of Residential Electricity Usage by End Use





4. KEMA states on page 8 that they rely upon detailed on-site data from a recent Rhode Island study to estimate commercial end-use saturations. We question that relevance of Rhode Island commercial building stock to Missouri.
5. KEMA states (page 9) that energy intensities are compared to California Commercial End-Use surveys for sanity checks. We question the relevance of California to Missouri.
6. KEMA states (page 9) that they adjust weather sensitive end use intensities to account for Missouri's climate differences. As Staff knows, the devil is in the details when making any weather adjustments. KEMA provided no details.
7. KEMA's commercial electricity consumption by end use is more reflective of the EIA West North Central Region than it is of the Ameren Missouri region.
8. We do not understand the KEMA approach to establishing the baseline for industrial sector energy consumption. Nowhere can we find in the KEMA approach the industrial electric and natural gas energy consumption by end use which is critical to understanding the KEMA approach.