

**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.)

REVISED POSITION STATEMENT OF AMEREN MISSOURI

COMES NOW Union Electric Company d/b/a Ameren Missouri (“Company” or “Ameren Missouri”), and for its Revised Statements of Position on the Issues to be determined by the Commission as set forth in the *Amended Order of Opening Statements, Order of Witnesses and Order of Cross Examination* filed in satisfaction of the Commission's July 8, 2015 *Order Directing Filing*, states as follows:

1. *Should the Commission approve, reject or modify Ameren Missouri's MEEIA Cycle 2 Plan (hereafter the “Plan”)?*

The Commission should approve the Plan, as modified by the terms described in the Non-unanimous Stipulation filed June 30, 2015 (hereinafter referred to as “Joint Position”), for the reasons stated in the Supplemental Testimony filed by the Company on the same date. The modifications proposed by the July 7, 2015 Non-Utility Stipulation do not support the policy underlying MEEIA, do not allow the Commission to discharge its obligations in support of that policy, and are unacceptable to the Company, as further outlined in its objection thereto and as stated in its Rebuttal Testimony filed July 15, 2015.

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 modified by the Joint Position, the Plan does demonstrate progress toward the achievement of all cost effective demand side savings and is consistent with MEEIA requirements and policy.

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 Company's DSIM operation is consistent with the original plan with certain modifications contained in the Joint Position. It is also true that the DSIM is substantially consistent with the DSIM currently in effect for Ameren Missouri. The changes associated with the Joint Position were made to address criticisms offered by Staff, specifically concerning the impact of certain rate case timing and outcome considerations that impact the calculation of the sharing percentages reflected in the Throughput Disincentive – Net Shared Benefit Mechanism ("TD-NSB"). Mr. Bill Davis discusses the changes to the DSIM TD-NSB in his Supplemental Testimony. Additionally, modifications were made to the DSIM related to the performance incentive, specifically providing for Net to Gross ex post savings estimation conducted by an Evaluation, Measurement, and Verification contractor. Under that process, the operation of the EM&V Reports mirror what is currently in effect for Ameren Missouri in MEEIA Cycle 1.

4. *If the Commission approves a Plan, what variances from Commission rules based on a showing of good cause are necessary?*

The Commission should grant the variances as identified in the application and any further variances deemed necessary to facilitate the approval of the Plan, as modified by the Joint Position.

5. *If the Commission approves a plan, should the total resource cost test be applied uniformly when calculating net shared benefits?*

The Company disagrees that this is an issue for resolution in this case.

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 Company's position has not changed since the time it filed its original Position Statement.

7. *In assessing the cost-effectiveness of demand-side programs, should Ameren Missouri consider the results of the utility cost test?*

The Company's position has not changed since the time it filed its original Position Statement.

8. *If the Commission modifies Ameren Missouri's MEEIA Cycle 2 Plan what modifications should the Commission adopt?*

Those contained in the Joint Position. The modification contained in the "Non-Utility" Stipulation are unacceptable to Ameren Missouri for the reasons stated in its Objection and further detailed in its Rebuttal Testimony.

Respectfully submitted,

UNION ELECTRIC COMPANY,
d/b/a Ameren Missouri

/s/ Wendy K. Tatro

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CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the above and foregoing document was sent via electronic mail on this 16th day of July, 2015, to all parties of record in File No. EO-2015-0055.

/s/ Matthew R. Tomc