

The Staff of the Missouri Public Service Commission,

Complainant,

vs.

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

Respondent.

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Case No. EC-2015-0315

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

2. Ameren's Reply incorrectly states Staff's position. More importantly, the proposal in Ameren's Reply is inconsistent with the Commission's Order,¹ which states, "... the company's performance incentive must be connected to how much money ratepayers actually saved as a result of the company's MEEIA program." The avoided costs ordered by the Commission are the only avoided costs that should be applied to determine actual ratepayer savings for the energy efficiency measures installed prior to

¹ *Order Granting Staff's Motion for Summary Determination and Denying Ameren Missouri's Motion for Summary Determination*, issued by the Missouri Public Service Commission on November 18, 2015.

October 1, 2014, for the dates beginning October 1, 2014, through the end of each measure's life.

WHEREFORE, for the reasons discussed above and in Staff's December 22, 2015, Response, Staff recommends that the Commission reject Ameren's Reply to Staff's Response along with its Application for Rehearing and Request for Clarification.

Respectfully submitted,

/s/ Whitney Payne

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CERTIFICATE OF SERVICE

I hereby certify that copies of the foregoing have been mailed, hand-delivered, transmitted by facsimile or electronically mailed to all counsel of record this 4th day of January, 2016.

/s/Whitney Payne