

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

In the Matter of Union Electric Company d/b/a )  
Ameren Missouri’s Filing to Implement Regulatory )  
Changes in Furtherance of Energy Efficiency as ) **Case No. EO-2012-0142**  
Allowed by MEEIA. )

**THE OFFICE OF PUBLIC COUNSEL’S OBJECTION TO THE NON-UNANIMOUS  
STIPULATION AND AGREEMENT SETTLING THE PROGRAM YEAR 2013  
CHANGE REQUESTS AND REQUEST FOR EVIDENTIARY HEARING**

COMES NOW the Office of the Public Counsel (“Public Counsel”) and for its objection to the *Non-Unanimous Stipulation and Agreement Settling the Program Year 2013 Change Requests* and request for evidentiary hearing, states as follows:

1. On August 20, 2014, the Missouri Public Service Commission (“Commission”) issued its *Order Staying Procedural Schedule* on motion of the Union Electric Company d/b/a Ameren Missouri (“Ameren Missouri” or “Company”) and the Staff of the Missouri Public Service Commission (“Staff”) to allow the parties additional time to conduct settlement discussions.

2. On September 19, 2014, the Staff and Ameren Missouri filed a Non-Unanimous Stipulation and Agreement (“Stipulation”) related to the evaluation, measurement and verification of the Company’s energy efficiency measures.

3. Public Counsel objects to the Stipulation and requests that the Commission direct the parties to agree upon and file a proposed procedural schedule that includes a date for stakeholder response to any change request and an evidentiary hearing.

WHEREFORE, the Office of the Public Counsel objects to the *Non-Unanimous Stipulation and Agreement Settling the Program Year 2013 Change Requests* and requests an evidentiary hearing.

Respectfully,

OFFICE OF THE PUBLIC COUNSEL

By:     /s/ Tim Opitz    

Tim Opitz  
Assistant Counsel  
Missouri Bar No. 65082  
P. O. Box 2230  
Jefferson City MO 65102  
(573) 751-5324  
(573) 751-5562 FAX  
Timothy.opitz@ded.mo.gov

CERTIFICATE OF SERVICE

I hereby certify that copies of the foregoing have been mailed, emailed or hand-delivered to all counsel of record this 26<sup>th</sup> day of September 2014:

**Missouri Public Service Commission**

Office General Counsel  
200 Madison Street, Suite 800  
P.O. Box 360  
Jefferson City, MO 65102  
staffcounsel@psc.mo.gov

**Missouri Public Service Commission**

Nathan Williams  
200 Madison Street, Suite 800  
P.O. Box 360  
Jefferson City, MO 65102  
Nathan.Williams@psc.mo.gov

**Natural Resources Defense Council**

Henry B Robertson  
319 N. Fourth St., Suite 800  
St. Louis, MO 63102  
hrobertson@greatriverslaw.org

**Renew Missouri**

Henry B Robertson  
319 N. Fourth St., Suite 800  
St. Louis, MO 63102  
hrobertson@greatriverslaw.org

**Sierra Club**

Henry B Robertson  
319 N. Fourth St., Suite 800  
St. Louis, MO 63102  
hrobertson@greatriverslaw.org

**Union Electric Company**

James B Lowery  
111 South Ninth St., Suite 200  
P.O. Box 918  
Columbia, MO 65205-0918  
lowery@smithlewis.com

**Union Electric Company**

Matthew R Tomc  
1901 Chouteau  
St. Louis, MO 63166  
AmerenMOService@ameren.com

**Union Electric Company**

Wendy Tatro  
1901 Chouteau Avenue  
St. Louis, MO 63166-6149  
AmerenMOService@ameren.com

**Barnes-Jewish Hospital**

Lisa C Langeneckert  
P.O. Box 411793  
St. Louis, MO 63141  
llangeneckert@att.net

**Kansas City Power & Light Company**

James M Fischer  
101 Madison Street, Suite 400  
Jefferson City, MO 35101  
jfischerpc@aol.com

**Kansas City Power & Light Company**

Roger W Steiner  
1200 Main Street, 16th Floor  
P.O. Box 418679  
Kansas City, MO 64105-9679  
roger.steiner@kcpl.com

**KCP&L Greater Missouri Operations Company**

James M Fischer  
101 Madison Street, Suite 400  
Jefferson City, MO 35101  
jfischerpc@aol.com

**KCP&L Greater Missouri Operations Company**

Roger W Steiner  
1200 Main Street, 16th Floor  
P.O. Box 418679  
Kansas City, MO 64105-9679  
roger.steiner@kcpl.com

**Laclede Gas Company**

Michael C Pendergast  
720 Olive Street, Suite 1520  
St. Louis, MO 63101  
mpendergast@lacledegas.com

**Laclede Gas Company**

Rick E Zucker  
720 Olive Street  
St. Louis, MO 63101  
rick.zucker@thelacledegroupp.com

**Missouri Division of Energy**

Jeremy D Knee  
301 West High Street  
P.O. Box 1157  
Jefferson City, MO 65102  
jeremy.knee@ded.mo.gov

**Missouri Industrial Energy Consumers (MIEC)**

Diana M Vuylsteke  
211 N. Broadway, Suite 3600  
St. Louis, MO 63102  
dmvuylsteke@bryancave.com

/s/ Tim Opitz

---