

IN 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)

**NATURAL RESOURCES DEFENSE COUNCIL'S RESPONSE TO
COMMISSION ORDER DIRECTING FILING**

Comes now the Natural Resources Defense Council (NRDC) and, in response to the Commission's order of September 17, 2015, replies as follows.

NRDC continues to support the non-unanimous stipulation of June 30, and supports the modifications filed by Ameren in its September 25 Response to the Commission's order directing filing. In light of the failure of renewed negotiations, the stipulation as modified presents the best opportunity for going forward with uninterrupted demand-side programs that will benefit all customers.

NRDC particularly supports the stronger low-income multi-family programs and the opportunity to identify additional cost-effective savings for program years 2017 and 2018.

NRDC reiterates its belief that the best way to avoid the time-consuming and so-far fruitless contentiousness over how to overcome the throughput disincentive is to adopt revenue decoupling. NRDC looks forward to exploring this policy in the working docket AW-2015-0282.

/s/ Henry B. Robertson
Henry B. Robertson (Mo. Bar No. 29502)
Great Rivers Environmental Law Center
319 N. Fourth Street, Suite 800
St. Louis, Missouri 63102
(314) 231-4181
(314) 231-4184 (facsimile)
hrobertson@greatriverslaw.org

Attorney for NRDC

CERTIFICATE OF SERVICE

I hereby certify that a true and correct PDF version of the foregoing was filed on EFIS and sent by email on this 28th day of September, 2015, to all counsel of record.

/s/Henry B. Robertson
Henry B. Robertson