

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

In the Matter of Union Electric Company d/b/a            )  
Ameren Missouri’s 2<sup>nd</sup> Filing to Implement            )  
Regulatory Changes in Furtherance of Energy        )  
Efficiency as Allowed by MEEIA                        )            Case No. EO-2015-0055

**STATEMENT OF POSITION OF  
THE MISSOURI INDUSTRIAL ENERGY CONSUMERS**

Comes now the Missouri Industrial Energy Consumers (“MIEC”) and, states its position on the issues as follows:

1.       Should the Commission approve, reject or modify Ameren Missouri’s MEEIA Cycle 2 Plan<sup>1</sup> (hereafter the “Plan”)?

**No position at this time.**

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)?

**No position at this time.**

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? )?

**No position at this time.**

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

---

<sup>1</sup> The proposed Plan includes the 2016-2018 demand-side management (DSM) programs, a technical resource manual (TRM), evaluation, measurement and verification (EM&V), and a demand-side investment mechanism (DSIM).

**No position at this time.**

**Office of the Public Counsel's Issues:**

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

**No position at this time.**

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 position at this time.**

**Sierra Club's Issue:**

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

**Not if the result is to adopt programs that do not pass the total resource cost test.**

**Missouri Division of Energy's Issue:**

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

**No position at this time.**

**Other Issues for the MIEC:**

**MIEC continues to recommend using the RAP standard for program design rather than the MAP standard.**

**MIEC recommends against consideration of decoupling.**

Respectfully submitted,

BRYAN CAVE, LLP

By: /s/ Diana Vuylsteke

Diana M. Vuylsteke, # 42419  
211 N. Broadway, Suite 3600  
St. Louis, Missouri 63102  
Telephone: (314) 259-2543  
Facsimile: (314) 259-2020  
E-mail: [dmvuylsteke@bryancave.com](mailto:dmvuylsteke@bryancave.com)

Edward F. Downey, # 28866  
221 Bolivar Street, Suite 101  
Jefferson City, MO 65101  
Telephone: (573) 556-6622  
Facsimile: (573) 556-7442  
E-mail: [efdowney@bryancave.com](mailto:efdowney@bryancave.com)

Attorneys for the Missouri Industrial  
Energy Consumers

**CERTIFICATE OF SERVICE**

I do hereby certify that a true and correct copy of the foregoing document has been emailed this 11<sup>th</sup> day of May, 2015, to all parties on the Commission's service list in this case.

/s/ Diana Vuylsteke