

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

In the Matter of Union Electric Company d/b/a )  
Ameren Missouri's Tariff to Increase its ) File No. ER-2014-0258  
Revenues for Electric Service )

**MISSOURI DIVISION OF ENERGY'S  
STATEMENT OF POSITION**

COMES NOW the Department of Economic Development – Division of Energy  
and states its positions as follows:

**21. Economic Development Rate Design Mechanisms**

A. Should the Commission expand the application of Ameren Missouri's existing Economic Development Riders?

Yes.

B. Should the Commission modify Ameren Missouri's existing Economic Development Riders to require recipients to participate in the Company's energy efficiency programs?

Yes. MEEIA participation, which benefits all customers, should be a precondition of receiving the special benefits of an Economic Development Rider, which all customers help fund. A MEEIA participation precondition, moreover, would help alleviate the tension between a rate mechanism designed to *increase* consumption and Missouri's state policy of *reducing* consumption (e.g. § 393.1040 RSMo).

C. Should the Commission open a docket to explore the role economic development riders have across regulated industries (i.e. water, electric, natural gas) and/or to further explore issues raised by parties in this case and issues the Commission inquired about at the beginning of the case?

Yes.

**26. Supplemental Service**

Should the Commission eliminate or modify the terms of Ameren Missouri's Supplemental Service tariff (aka. Rider E)?

Yes. Rider E runs afoul of 4 CSR 240-20.060(5)(C) by assuming that any reductions in qualifying facilities' output will occur simultaneously or during the system peak or both. Rider E, moreover, is not just and reasonable because it lacks any demonstrable relationship to actual costs and unduly discriminates against cogenerating customers. The Commission, therefore, should order the replacement of Rider E with a rate framework that better comports with the law.

Respectfully submitted,

/s/ Jeremy Knee

Jeremy Knee, Bar #64644  
Associate General Counsel  
Missouri Department of Economic Development  
P.O. Box 1157  
Jefferson City, MO 65102  
Ph: 573-522-3304  
E: [jeremy.knee@ded.mo.gov](mailto:jeremy.knee@ded.mo.gov)  
**Attorney for Missouri DED**  
**Division of Energy**

**CERTIFICATE OF SERVICE**

I hereby certify that true and correct copies of the foregoing have been emailed to the certified service list this 19th day of February, 2015.

/s/ Jeremy Knee