

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

In the Matter of a Working Docket to Review the)	
Commission's Missouri Energy Efficiency Investment Act)	Case No. EW-2015-0105
(MEEIA) Rules 4 CSR 240-3.163, 4 CSR 240-3.164,)	
4 CSR 240-20.092, .093 and .094)	

COMMENTS OF THE MISSOURI INDUSTRIAL ENERGY CONSUMERS

The Missouri Industrial Energy Consumers ("MIEC") hereby submit their comments as follows:

1. The MIEC submits these comments to the draft rules, with comments, served by Staff on July 15, 2015.

2. For 4 CSR 240-20.092, on page 1, the MIEC agrees with the utilities that the ACEEE definitions should be retained for the reasons noted in the box on page one and elsewhere in boxes on the marked up draft rule. On page 5, the MIEC agrees with comment GC4 ("Ameren proposes to use the original definition, on the grounds that it should match the definition in the IRP regulations.").

3. For 4 CSR 240-20.093, on page 7, the MIEC agrees with the utility stakeholders that oppose use of a statewide TRM for the reasons articulated in the box on that page ("Object to a statewide TRM. Remain concerned about articulating how MEEIA cycles approved before the statewide TRM are not subject to the statewide TRM.").

4. For 4 CSR 240-20.094, on page 3, the MIEC objects to a statewide potential study for the reasons articulated by the utilities ("They prefer that each utility develop their own market potential studies. Each utility's costs are different, their service territories have significant differences."). On pages 9 and 10, the MIEC agrees with customer stakeholder

comments concerning the additional burden that unnecessarily would be placed on the participants (“Customer stakeholder objects to the additional burdens on opt out customers, it creates barriers to opt out, and staff would be required to handle confidential business information and suggests that the demonstration process should remain unchanged.”). In this regard, the MIEC suggests leaving the current rule as is. On page 12, the MIEC opposes the statewide potential study because it is meaningless because of diversity across the state. Each utility needs to have its own potential study.

5. On July 19, Ameren Missouri submitted what it called attachment “C”, avoided cost definitions. The MIEC recommends that those definitions be adopted.

Respectfully submitted,

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