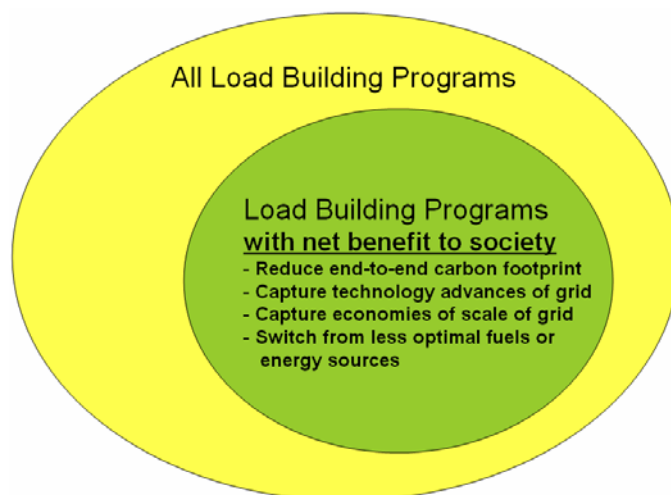


Load Building Programs Proposed Revisions to IRP Rules; General Vision

In today's carbon-conscious energy environment, a load building program sponsored by an electric utility can at first glance seem questionable. In the universe of load building programs, however, there are a significant portion of activities that remain beneficial to all stakeholders, and are progressive. To the extent that a load building program benefits society – e.g. reducing end-to-end carbon footprint for a process, capturing technology advances and economies of scale from a centralized electric grid, or switching away from less optimal fuels or energy sources – utilities should be encouraged to pursue such opportunities.

This load building could include such opportunities as Plug-in Hybrid Electric Vehicles (PHEVs), industrial process improvements, synergies with Smart Grid applications, etc.

With this in mind, AmerenUE proposes the following revisions to the Rules for Electric Utility Resource Planning (4 CSR 240-22), considering each section in which load building is mentioned:



4 CSR 240-22.020 (29) NO CHANGES PROPOSED.

Load-building program means an organized promotional effort by the utility to persuade energy-related decision-makers to choose electricity instead of other forms of energy for the provision of energy service or to persuade existing customers to increase their use of electricity, either by substituting electricity for other forms of energy or by increasing the level or variety of energy services used. This term is not intended to include the provision of technical or engineering assistance, information about filed rates and tariffs, or other forms of routine customer service.

4 CSR 240-22.050 (10) NO CHANGES PROPOSED.

Demand-side programs and load-building programs shall be separately designed and administered, and all costs shall be separately classified so as to permit a clear distinction between demand-side program costs and the costs of load-building programs. The costs of demand-side resource development that also serve other functions shall be allocated between the functions served.

4 CSR 240-22.060 (3) PROPOSED CHANGES IN BLUE

Development of Alternative Resource Plans. The utility shall use appropriate combinations of candidate demand-side and supply-side resources to develop a set of alternative resource plans, each of which is designed to achieve one (1) or more of the planning objectives identified in 4 CSR 240-22.010(2). ~~The alternative resource plans developed at this stage of the analysis shall not include load-building programs, which shall be analyzed as required by section (5) of this rule.~~ Alternative resource plans developed at this stage of the analysis which include load-building programs shall be additionally analyzed as required by section (5) of this rule.

4 CSR 240-22.060 (5) PROPOSED CHANGES IN BLUE

Analysis of Load-Building Programs. If the utility intends to continue existing load building programs or implement new ones, it shall analyze these programs in the context of one (1) or more of the alternative plans developed pursuant to section (3) of this rule. ~~, including the preferred resource plan selected pursuant to 4 CSR 240-22.070(6).~~ This analysis shall use the same modeling procedure and assumptions described in section (4) and shall include the following elements:

- (A) Estimation of the impact of load-building programs on the electric utility's summer and winter peak demands and energy usage;
- (B) A comparison of annual average rates in each year of the planning horizon for the resource plan with and without the load building program;
- (C) An analysis showing end-to-end energy use of the targeted load building activities with and without the load building program.
- (D)~~(C)~~ A comparison of the probable environmental costs and benefits of the resource plan in each year of the planning horizon with and without the proposed load-building program; and
- (E)~~(D)~~ An assessment of any other aspects of the proposed load-building programs that affect the public interest (e.g. costs, benefits, efficiencies, inefficiencies).

4 CSR 240-22.060 (6)(F) PROPOSED CHANGES IN BLUE

Integrated Resource Analysis: A description of any proposed loadbuilding programs, a discussion of why these programs are judged to be in the public interest and, for all resource plans that include these programs, plots of the following over the planning horizon:

1. Annual average rates with and without the load-building programs; and
2. Annual utility costs and benefits and probable environmental costs and benefits with and without the load-building programs.