

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

In the Matter of Union Electric Company d/b/a)
Ameren Missouri’s 3rd Filing to implement)
Regulatory Changes in Furtherance)
of Energy Efficiency as Allowed by MEEIA) **Case No. EO-2018-0211**

**MOTION FOR INCLUSION OF PROPOSAL IN FURTHERANCE
OF STAFF’S REPORT ON DISTRIBUTED ENERGY RESOURCES**

COMES NOW the Staff (“Staff”) of the Missouri Public Service Commission (“Commission”), by and through counsel, and states the following:

1. On April 5, 2018, in File No. EW-2017-0245, Staff submitted its *Report on Distributed Energy Resources* (“Staff Report”) summarizing the information received from stakeholders responding to a series of Commission questions, and provided Staff’s analysis and recommendations.

2. Under Subsection V of the Staff Report, which provides policy and legal recommendations regarding Distributed Energy Resources, Staff included a determination that allowing a retail customer to participate in an interruptible or curtailable load program fits squarely within the statutory and regulatory parameters of MEEIA.

3. Under Subsection VI of the Staff Report, which provides for “Retail aggregation and the Indiana Model”, Staff recommended the Commission encourage Missouri electric utilities to submit tariffs similar to the Indiana Model.

4. On April 18, 2018, the Commission issued its *Response to Staff Report Regarding Distributed Energy Resources* (“Response”) in EW-2017-0245. In its

Response, the Commission ordered acceptance of the recommendations offered by Staff in the April 5, 2018, Staff Report.

5. Union Electric Company d/b/a Ameren Missouri filed its Notice of Case Filing February 1, 2018, stating its intent to file its MEEIA Cycle 3 application on or after April 2, 2018.

6. In furtherance of the Commission's April 18, 2018, Order in File No. EW-2017-0245, Staff respectfully requests that the Commission direct Ameren Missouri to include in its MEEIA Cycle 3 application a response to Staff's recommendations made in its April 5, 2018, Staff Report. Specifically, Staff requests the Commission encourage Ameren Missouri to submit a proposal and exemplary tariffs in its pending MEEIA Cycle 3 application, related to demand response and the Indiana Model.

WHEREFORE, Staff requests the Commission direct Ameren Missouri to file with its MEEIA Cycle 3 application a response to address Staff's recommendations; encourage Ameren Missouri to file the applicable support identified herein; and grant such other and further relief as is just in the circumstances.

Respectfully submitted,

/s/ Whitney Payne

Whitney Payne

Legal Counsel

Missouri Bar No. 64078

Attorney for the Staff of the

Missouri Public Service Commission

P. O. Box 360

Jefferson City, MO 65102

(573) 751-8706 (Telephone)

(573) 751-9285 (Fax)

whitney.payne@psc.mo.gov

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing was served by electronic mail, or First Class United States Postal Mail, postage prepaid, on this 26th day of April, 2018, to all counsel of record.

/s/Whitney Payne