BEFORE THE PUBLIC SERVICE COMMISSION OF THE STATE OF MISSOURI

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In the Matter of Union Electric Company d/b/a Ameren Missouri's 4th Filing to Implement Regulatory Changes in Furtherance of Energy Efficiency as Allowed by MEEIA

File No. EO-2023-0136

NRDC'S WITHDRAWAL OF ITS OBJECTIONS TO NONUNANIMOUS STIPULATION AND AGREEMENT

COMES NOW Natural Resources Defense Council ("NRDC"), and amends its response to the Non-Unanimous Stipulation and Agreement Regarding the Implementation of Certain MEEIA 4 Programs Through Plan Year 2027, Motion for Expedited Treatment, and Request for Variances, filed in this matter on October 30, 2024 (the "Stipulation"), respectfully stating as follows:

1. On October 30, 2024, Union Electric Company, d/b/a Ameren Missouri

("Ameren"), the Office of Public Counsel, Renew Missouri and Consumers Council (collectively, the "Signatories") filed the Stipulation.

2. On November 5, 2024, and pursuant to 20 CSR 4240-2.115(2)(B), NRDC filed its Opposition to Nonunanimous Stipulation and Agreement and Brief in Support of Ameren Missouri's Application to Approve DSIM and Demand-Side Management Portfolio and Plan, objecting to the Stipulation, because NRDC opposed the Stipulation's proposed reductions in energy efficiency savings as compared to Ameren's original Plan.

3. Despite these concerns, and after additional opportunities for NRDC to meet and confer with Ameren, NRDC wishes to withdraw its objections to the Stipulation so as not to stand in the way of implementation of Ameren's proposed energy efficiency programs in the State.

4. If Ameren decides to pursue another MEEIA cycle in the future, NRDC hopes that its concerns laid out in its Brief and the Testimony of Stacy Sherwood will be taken into consideration and addressed by a future MEEIA application.

WHEREFORE, NRDC withdraws its objections to the Non-Unanimous Stipulation and

Agreement Regarding the Implementation of Certain MEEIA 4 Programs Through Plan Year

2027, Motion for Expedited Treatment, and Request for Variances.

Dated November 8th, 2024

Respectfully Submitted,

/s/ Sarah Rubenstein Sarah Rubenstein (MO Bar #48874) Great Rivers Environmental Law Center 319 N. Fourth Street, Suite 800 St. Louis, Missouri 63102 (314) 231-4181 srubenstein@greatriverslaw.org

Counsel for Natural Resources Defense Council

CERTIFICATE OF SERVICE

I hereby certify that on this 8th day of November, 2024, a true and correct copy of the

foregoing pleading was filed on EFIS and sent by email to all counsel of record.

<u>/s/ Sarah Rubenstein</u> Sarah Rubenstein