



annual Evaluation, Monitoring and Verification (EM&V) Study and has concluded its investment reduces energy demand by about 0.5% per year. Since its inception, the energy efficiency program in the rural areas AECI serves has never achieved a cumulative impact of over 1.0% on an annual basis, far from the 1.5% compound annual reduction forecasted by the EPA.

The EPA has grossly overestimated the energy efficiency reductions achievable in rural areas because it has failed to take into account lower population densities, lower income levels, and the relative lack of economies of scale for large commercial/business/office energy users when compared with the demographics of investor-owned utility service areas. Moreover, only three states (Arizona, Connecticut, and Vermont) have achieved a 1.5% energy efficiency goal and those states have programs over twenty years old. California, which often is used as an example of the model for state energy efficiency programs, has only achieved a 1% reduction; most other states are closer to 0.5%.

The 1.5% energy efficiency target theoretically *may* be achievable over time but certainly not in the short timeframe allowed for compliance under the Clean Power Plan as currently proposed. At minimum, the EPA should remove or modify Building Block #4 to a more realistic energy efficiency target for rural electric cooperatives.

4. More than 200,000 member-owners of Missouri's electric cooperatives already have taken the time and effort to send individual messages to the EPA to voice their concerns about the EPA's proposed Clean Power Plan and its adverse impact on the affordability of electricity in rural Missouri. In addition to carefully considering the more specific and technical comments AMEC has submitted, AMEC asks that the Commission remember and respect these real-world, non-theoretical concerns when it submits its comments to the EPA.

Respectfully submitted,

/s/ Brent Stewart

Brent Stewart, MoBar 34885

Legislative and Regulatory Counsel

Association of Missouri Electric Cooperatives

2722 East McCarty Street

P.O. Box 1645

Jefferson City, Missouri 65102

(573) 659-3442 (office)

(573) 659-3411 (fax)

bstewart@amec.org

### **CERTIFICATE OF SERVICE**

I hereby certify that a true and correct copy of the foregoing document was filed in the above captioned case via EFIS with an electronic copy provided via email to the Commission's General Counsel's Office and to the Office of the Public Counsel this 16th day of September, 2014.

/s/ Brent Stewart