

BEFORE THE PUBLIC SERVICE COMMISSION
OF THE STATE OF MISSOURI

In the Matter of Union Electric Company d/b/a)	
Ameren Missouri's 2nd Filing to Implement)	File No. EO-2015-0055
Regulatory Changes in Furtherance of Energy)	
Efficiency as Allowed by MEEIA)	

**NRDC'S OBJECTION TO AMENDED NON-UNANIMOUS
STIPULATION AND AGREEMENT**

Pursuant to Commission Rule 4 CSR 240-2.115(2)(B), the Natural Resources Defense Council ("NRDC") states as follows:

1. On July 7, 2015, Commission Staff, OPC, MIEC, MCEG and Renew Missouri filed a Non-Unanimous Stipulation and Agreement, which was superseded on July 8 by an Amended Non-Unanimous Stipulation and Agreement.
2. While the stipulation resolves the issues in the case to the satisfaction of the signatories, Ameren Missouri has already filed an objection. The stipulation therefore represents only the position of the signatory parties.
3. NRDC has signed a competing non-unanimous stipulation with Ameren Missouri, Division of Energy, KCP&L, KCP&L-GMO, and United for Missouri. Therefore NRDC must take notice of the differences in position between these stipulations. The following specific objections are not necessarily an exhaustive list.
4. The amended stipulation of Staff et al. accepts energy savings levels that are only marginally better than those in Ameren's original MEEIA plan. NRDC continues to believe that these savings fall woefully short of representing progress towards a goal of achieving all cost-effective demand-side savings. Section 393.1075.4, RSMo.
5. NRDC also objects to basing the performance incentive on demand savings

rather than energy savings. This will disadvantage residential ratepayers who do not pay demand charges, and is unlikely to lead to the kind of deep, whole-building energy savings envisioned in the amended stipulation.

Dated: July 14, 2015

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CERTIFICATE OF SERVICE

I hereby certify that a true and correct PDF version of the foregoing was filed on EFIS and sent by email on this 14th day of July, 2015, to all counsel of record.

/s/ Henry B. Robertson
Henry B. Robertson