BEFORE THE PUBLIC SERVICE COMMISSION
OF THE STATE OF MISSOURI

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

CONSUMERS COUNCIL OF MISSOURI'S RESPONSE
TO THE NON-UNANIMOUS AMENDED STIPULATION AND AGREEMENT

COMES NOW the Consumers Council of Missouri ("Consumers Council" or "CCM"), and hereby responds to the Non-Unanimous Amended Stipulation and Agreement (also referred to as the "*Amended MEEIA 4 Extension Stipulation*") filed by Ameren Missouri and certain other parties in this case on November 6, 2026:

1. The Amended MEEIA 4 Extension Stipulation proposes to eliminate all of the energy efficiency projects that have been funded through Ameren Missouri's MEEIA surcharge, and shifting focus primarily to demand response projects. Consumers Council was not included in the negotiations that resulted in this new stipulation.
2. The Amended MEEIA 4 Extension Stipulation proposes to zero out funding for all energy efficiency projects currently funded through the MEEIA surcharge, including an elimination of all income-eligible energy efficiency programs. The document gives no reason for this elimination, nor why the change was made from what was proposed in the previous September stipulation in this case.

3. Consumers Council has long opposed the use of a single-issue surcharge mechanism to seek recovery of MEEIA costs from consumers. Consumers Council has also been critical of certain MEEIA programs that struggled to prove significant savings. However, the income-eligible MEEIA programs have proven to be successful and meaningful to many families in need, and thus should be spared. These income-eligible programs have supplied tangible benefits to households least able to absorb rising energy costs.
4. Dr. Marke, testifying for the Office of the Public Counsel, called income-eligible multi-family "the single-most underserved and overlooked demographic", and OPC's own "MEEIA-Light" alternative would have funded it at $10M a year.[1]
5. Income-eligible customers often have the fewest resources to make necessary energy efficiency improvements on their own homes. Seniors on fixed incomes, people with disabilities, and families with limited financial resources may be especially affected. Eliminating income-eligible programs without a viable replacement would disproportionately disadvantage households that are already struggling to afford essential utility service.
6. These programs serve a purpose that cannot be adequately replaced by a primary focus on demand response. Demand response initiatives may provide benefits to the electric system by helping manage peak demand, but income-eligible energy efficiency programs directly address the underlying energy burden experienced by vulnerable households.

[1] Rebuttal Testimony of Geoff Marke, filed April 26, 2024, pp. 21-24.

Energy efficiency is not simply a utility system management tool; it is also an important component of protecting residential consumers. These measures can also continue to generate savings long after the initial investment.

7. Under the MEEIA law, programs targeted to low-income customers or general education campaigns do not need to meet a cost-effectiveness test, so long as the commission determines that the program or campaign is in the public interest.[2] Nonetheless, the income-eligible MEEIA portfolio has actually achieved an impressive 109% of its annual net MWh savings goal.[3]

8. Consumers Council is not invoking its right to request to a hearing under Commission Rule 20 CSR 4240-2.115(2)(B) with regard to the *Amended MEEIA 4 Extension Stipulation*. But this decision to not request a hearing should not be viewed as Consumers Council support for the stipulation. Consumers Council is concerned that elimination of the income-eligible programs under MEEIA will cause needy households to miss out on assistance that could address the affordability of their monthly bills. Consumers Council believes that now is the wrong time to be taking away efficiency tools that could address the affordability of electric rates for many Missouri households who are currently struggling with relentless energy inflation.

[2] See § 393.1075.4(14) RSMo.
[3] ADM Associates, Inc., *Portfolio Summary Report: Ameren Missouri PY2024* (June 10, 2025), filed in File No. EO-2018-0211, Item No. 244 (June 11, 2025), Table 2-1, accepted by *Order Accepting EM&V Program Year 2024 Reports*, File No. EO-2018-0211 (July 31, 2025).

9. Nonetheless, Consumers Council hopes that if all of the MEEIA income-eligible energy efficiency projects are indeed eliminated in this docket, that the Commission considers replacing the MEEIA funding for those programs with another source of funding, either through the ongoing Ameren Missouri general rate case[4], or through another separate docket.

Respectfully submitted,

/s/ John B. Coffman

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[4] Case No. ER-2026-0291.

CERTIFICATE OF SERVICE

I hereby certify that copies of the foregoing have been mailed, emailed or hand-delivered to all parties listed on the official service list on this 13th day of November 2026.

/s/ John B. Coffman