STATE OF ILLINOIS
ILLINOIS COMMERCE COMMISSION

AMEREN ILLINOIS COMPANY	)	
	)	**13-0498**
Approval of the Energy Efficiency and	)	
Demand Response Plan Pursuant to	)	
220 ILCS 5/8-103 and 220 ILCS 5/8-104	)	

REBUTTAL TESTIMONY OF REBECCA DEVENS

ON BEHALF OF

THE CITIZENS UTILITY BOARD

CUB Exhibit 2.0

October 28, 2013

INTRODUCTION

Q. Please state your name and business address.

A. My name is Rebecca Devens. My business address is 309 W. Washington, Suite 800, Chicago, IL 60606.

Q. Are you the same Rebecca Devens who filed testimony in this docket on October 18, 2013?

A. Yes.

Q. What is the purpose of your testimony?

A. The purpose of my testimony is to respond to the direct testimonies of the Office of the Attorney General on Behalf of the People of the State of Illinois ("OAG"), the Natural Resources Defense Council ("NRDC"), the Environmental Law and Policy Center ("ELPC"), and the Staff of the Illinois Commerce Commission ("Staff") regarding Ameren Illinois Company's ("Ameren" or "the Company") three-year Energy Efficiency Portfolio Standard Plan (the "Plan"). Specifically, I will respond to these parties' recommendations related to Illinois Power Agency ("IPA") programs, utility flexibility and discretion, banking, and smart devices.

I. IPA PROGRAMS

Q. What are the IPA programs?

A. The IPA programs refer to the measures or programs procured by the IPA pursuant by Section 16-111.5B of the Public Utilities Act ("the PUA" or "the Act"). That portion of the statue directs Ameren and Commonwealth Edison Company ("ComEd") to annually submit an assessment of cost-effective energy efficiency programs or measures that could be included in the procurement plan to the IPA by July 15th. 220 ILCS 5/16-111.5B(a). The assessments should include

> "Identification of new or expanded cost-effective energy efficiency programs or measures that are incremental to those included in energy efficiency and demand-response plans approved by the Commission pursuant to Section 8-103 of this Act and that would be offered to all retail customers whose electric service has not been declared competitive under Section 16-113 of this Act and who are eligible to purchase power and energy from the utility under fixed-price bundled service tariffs, regardless of whether such customers actually do purchase such power and energy from the utility." *Id.*

After this assessment is given the IPA, the IPA must include cost-effective energy efficiency programs and measures it determines are cost-effective and the associated annual energy savings goal in the Plan. 220 ILCS 5/16-111.5B(g). The Commission then must also approve the energy efficiency programs and measures included in the Plan "if the Commission determines they fully capture the potential for all achievable cost-effective savings, to the extent practicable, and otherwise satisfy the requirements of Section 8-103 of this Act." *Id.*

Last year, the 2013 IPA Procurement Plan was the first time the IPA incremental energy efficiency programs were included in the IPA Plan. In the Final Order approving that plan, the Commission ordered Staff and the IPA to facilitate a workshop process. Final Order in ICC Docket No. 12-0544 at 271. I participated in that workshop process, along with the utilities and other stakeholders, and we reached consensus on many issues, including that the IPA programs are separate from the 8-103 portfolios, and as such that the utilities will exercise minimal administrative control over non-utility administered programs, and that savings from IPA programs will not count towards the 8-103 goals we are discussing in this Plan filing.

Q. What recommendations do parties make regarding the IPA programs?

A. NRDC recommends that the Commission order Ameren to move the electric portion of its behavior modification program, Home Energy Reports, for PY 8 and PY 9 to the IPA portfolio. NRDC Ex. 1.0 at 21. NRDC suggests this would be consistent with ComEd's treatment of its behavior modification program, which ComEd shifted to the IPA Procurement Plan for PYs 7-9. *Id.* NRDC states that this would reduce savings in the 8-103 portfolio, but would free up budget resources to invest in other programs. Specifically, NRDC recommends investing the newly available $1.3 million previously spent on Home Energy Reports on the Business Standard program. *Id.*

The OAG recommends that Ameren move both the Home Energy Reports program and the Standard CFLs program to the IPA. OAG Ex. 1.0 at 14-15. Ameren already moved the Specialty CFLs program to the IPA. *Id.* at 14. The OAG also believes Ameren should increase the number of CFLs incented in the program, and posits that by keeping the Specialty and Standard CFLS programs separate, Ameren may be creating inefficiencies in outreach, vendor coordination, data tracking, and evaluation. *Id.* at 14-15. The OAG states that this program is a "good candidate" for IPA funding because it is a "standalone program with straightforward administrative procedures, and can easily be ramped up without large increases in administrative funding." *Id*. at 15. The OAG goes on to recommend that the Home Energy Reports program also be increased if moved to the IPA. Id. Like NRDC, the OAG recommends that the funds freed up for 8-103 programs from moving the Home Energy Reports program and Standard CFL program to the IPA should be spent on three Commercial and Industrial ("C&I") sector programs. *Id*. at 17. The OAG posits that this is a prudent action because 1) C&I savings are cheaper than residential program savings; 2) there are more cost-effective efficiency opportunities in the C&I sector, and 3) C&I programs have a greater ability to ramp up. *Id*. The OAG concedes that "equity between sectors is important," but that "residential ratepayers still will benefit significantly from IPA programs, so shifting these Section 8-103 funds to C&I will effectively maintain total residential contributions." *Id*. However, the OAG would also "support a balanced approach where some funds were shifted to C&I programs and a portion is shifted to ramp up other residential programs." *Id*. at 18.

Q. Do you support NRDC and the OAG's recommendation to move any programs to the IPA?

A. Yes. I agree with both stakeholders that the Home Energy Reports program should be moved to the IPA, and with the OAG that the Standard CFL program should also be moved. While I am not an attorney, Section 16-111.5 B of the Act calls for "new or expanded cost-effective energy efficiency programs or measures that are incremental to those included in energy efficiency and demand response plans approved by the Commission pursuant to Section 8-103 of this Act," and I believe that means the General Assembly sought for ComEd and Ameren to achieve energy efficiency savings incremental to the 8-103 programs. 220 ILCS 5-16-111.5B(a). I do not believe that the programs Ameren has bid to the IPA in this year's IPA Procurement Plan are adequate. In last year's Plan, Ameren programs were forecasted to provide savings of 70, 834 MWh, reduce the energy required for the IPA procured portfolio by 25,409 MWh, and lower peak demand by 4 MW. IPA Plan in ICC Docket No. 13-0546 at 81. In this year's Plan, Ameren is proposing programs with estimated savings of 65,680 MWH, peak demand reductions of 2 MW, and savings attributable to eligible retail customers of 17,950 MWH. *Id*. at 86. This is a reduction in savings of 5,154 MWH and 2 MW of peak demand from last year.

I am disappointed that Ameren was unable to bid a greater number of MWH into the incremental IPA energy efficiency, particularly in a year when Ameren is also filing its three year 8-103 portfolio. This year, ComEd doubled the number of MWH from last year in the first year of the Company's programs, increased the savings by nine fold from last year over the three year program life, and more than doubled the demand reductions.

Ameren has had no trouble meeting the 8-103 Commission approved goals in recent years, and has done so without expending the budget. Ameren is clearly capable of achieving greater MWH savings under both the IPA and 8-103 programs, and moving the Home Energy Reports and Standard CFL programs to the IPA is an important first step in increasing the savings Ameren achieves.

Q. Do you support NRDC and the OAG's recommendation that Ameren spend the money that will no longer be spent on the two residential programs that are moved to the IPA on one or more commercial and/or industrial sector programs?

A. No. The Act states that 8-103 programs must "represent a diverse cross-section of opportunities for customers of all rate classes to participate in the programs." 220 ILCS 5/8-103(f). The Act calls for customers funding the 8-103 programs to have programs available to them. From participating in the SAG, it is my understanding that at least some utilities specifically allocate funds collected from a customer class to programs delivered to that specific customer class, which CUB believes is equitable and supports. It is also my understanding that utilities are sensitive to the above language from the Act because they do not wish to noncompliant with the statutory requirements. C&I sector programs may be more cost-effective than residential programs, and residential customers still receive benefits from C&I programs, but by law residential customers must have the opportunity to participate in 8-103 programs they fund. Further, there is great volatility in the load served by the IPA. In recent years, around two-thirds or three-quarters of customers have switched from purchasing supply from ComEd or Ameren as procured by the IPA to purchasing supply from an Alternative Retail Electricity Supplier (an "ARES" or "supplier"). Customers who have switched to purchasing supply from an ARES no longer require the IPA to procure power for them. This volatility means that it is possible for the IPA to have procured more supply than is required in a given year. In such a year, it is possible that the IPA or Commission may find that the IPA does not need to procure any or as much energy efficiency as in previous years. Under that scenario, residential customers who are funding both the 8-103 and incremental IPA EE programs through Rider EDA would have limited access to programs if Ameren is not at the same time offering them robust program offerings through the 8-103 as well.

When discussing the opportunity for energy efficiency created by the IPA and the relationship between the IPA and 8-103 programs, I think it is important to bear in mind that the IPA serves residential and small business load. Residential and small business customers either purchase supply procured by the IPA or are eligible to purchase supply procured by the IPA. As such, they fund the IPA programs and can realize the benefit from them. Just because residential customers are now funding programs through both the IPA and the 8-103 does not mean that those customers are not entitled to a full, diverse, and comprehensive portfolio of program under the 8-103 portfolio.

Q. What are your recommendations to the Commission related to moving programs to the IPA?

A. I support the OAG's recommendation that Ameren move the Standard CFL and Home Energy Reports programs to the IPA, and recommend that the Commission order Ameren to do so. I also recommend that the Commission order Ameren to spend most of the funds freed up by moving those two programs to the IPA on either new or existing residential programs.

II. UTILITY FLEXIBILITY AND DISCRETION

Q. What does Ameren request regarding Company flexibility and discretion?

A. Ameren makes the following requests related to managing program and portfolio risk: 1) Maintain portfolio flexibility; 2) Align the timing for the application of the IL net-to-gross (NTG) framework and Technical Reference Manual (TRM) to the program years; 3) Maintain a portfolio level positive TRC, while recognizing that measure level TRCs fluctuate; and 4) "Align" savings goals according to changes in TRM and NTG values, meaning Ameren is asking to reduce goals if TRM and/or NTG values decline. Ameren Ex. 1.1(2nd Rev.) at 18-21.

Q. Do you support these requests?

A. I support the second and third requests. I support the first request within certain parameters, and I do not support the fourth request.

Q. Do other stakeholders comment on the request for portfolio flexibility?

A. Yes. The OAG and NRDC both posit that Ameren should have some flexibility, but that the amount requested in the Plan filing is too great. NRDC states that the flexibility Ameren is requesting could allow the Company to reduce its Plan savings targets without Commission approval. NRDC Ex. 1.0 at 25. The OAG states approving Ameren's request would be tantamount to Ameren "pursuing a different, cheaper plan than the one approved by the ICC," because with "unlimited ability to shift funds, Ameren is virtually guaranteed it can easily meet any approved goal simply by shifting more effort to the cheapest programs." OAG Ex. 1.0 at 31.

Q. Do you agree with NRDC and the OAG's concerns?

A. Yes. While Ameren has done a good job of running a multi-faceted portfolio of programs that reach diverse customer classes in previous years, we should safeguard against policies that would allow the Company to heavily invest in the cheapest programs at the expense of more expensive programs with longer and more significant savings. For example, under Ameren's proposal, the Company could shift funding from the moderate income multifamily program, which has a TRC of 1.14, to the Standard CFL program, which has a TRC of 1.98, because the CFL program is cheaper. Ameren Ex. 1.1(2nd Rev.) at 10. But this would mean that moderate income multifamily customers, an important customer sector to reach, would have fewer offerings available to them, and overall, the portfolio would include fewer offerings with deeper and longer savings.

For that reason, I recommend that the Commission adopt the OAG's proposal that:

> "Any shifts of budgets that result in a variance from planned annual program budgets of 20% or more would trigger goal adjustment. In other words, Ameren could underspend 10% in one program and overspend 15% in another program with no adjustments. However, if it were to shift resources beyond the 20% benchmark, then goals would be modified accordingly." OAG Ex. 1.0 at 32.

I also recommend that the Commission adopt the OAG's proposal for Ameren to discuss proposed program and budget changes with the SAG. *Id*. at 34. These recommendations strike a balance between providing Ameren with the necessary flexibility to manage the portfolio while still ensuring that the Company administers the programs approved in this Plan in the manner approved in this Plan filing and comes as close as possible to meeting the statutory annual incremental goals.

Q. Do stakeholders comment on Ameren's fourth request, for the Company to be able to alter the approved annual incremental savings goals in response to changes in TRM and NTG values?

A. Yes. NRDC does not support this request, and states that if the Commission approved this request, it would "send too strong a message that Ameren does not need to stay alert to changing market conditions in managing its portfolio," that "removing this level of risk rewards complacency rather than innovation, which will not lead to the greatest return on investment for Ameren's ratepayers," and that this would "create a disincentive for Ameren to actively manage its portfolio to maximize ratepayer benefits as market conditions change." NRDC Ex. 1.0 at 27-28. The OAG agrees, stating that the request is "unreasonable," would not lead to Ameren having an incentive to forecast likely NTG results and make sure it is spending resources appropriately to respond to changes in the market. OAG Ex. 1.0 at 40. Additionally, the OAG states that implementing Ameren's request would be "extremely administratively burdensome and impractical" because the TRM contains hundreds of measures and thousand of individual assumptions, and if TRM changes "had to be translated into explicit goal adjustments," it would "result in constantly moving targets, require extensive administrative effort, and significantly reduce transparency of goals," and "be very difficult for SAG parties to follow and understand how goal adjustments were made and whether they were appropriate." *Id*. at 42.

Staff is willing to accept this proposal with modifications, but notes that this flexibility "allows the Company to take a 'set-it-and-forget-it' approach to managing its portfolio. Staff Ex. 1.0 at 28. Staff also believes that if the Commission does not adopt this proposal, Ameren will "have an incentive to oppose updates to the IL-TRM and NTG values that reduce savings attributable to measures." *Id*. at 29.

Q. How do you respond to NRDC, the OAG, and Staff's testimonies on this issue?

A. I agree with NRDC's and the OAG's responses to Ameren's request. Allowing the Company to change goals any time there is a change in the NTG or TRM values for a measure or program is antithetical to the purpose of the statutory Energy Efficiency Portfolio Standard ("EEPS") goals, which call for utilities to put forth efforts to annually increase the amount of energy efficiency achieved by managing programs. The OAG states that Ameren is spending ratepayer money to offer these programs, and as so, has a responsibility toward ratepayers, not shareholders. OAG Ex. 1.0 at 43. CUB couldn't agree more. Risk management is an inherent facet of offering goal-centered energy efficiency programs. CUB, along with NRDC and the OAG, supports a reasonable degree of flexibility, and therefore supports Ameren's request for flexibility to adjust programs and budgets within reason. Ameren should not operate under a scheme where the Company does not face any risk for not meeting Commission approved goals. I disagree with Staff that if Ameren is not provided with the flexibility to adjust goals based on changes in TRM and NTG values, the Company will oppose updates that could lead to lower savings. I do not believe that this concern is adequate justification for granting the Company an unfettered ability to lower savings goals. Ameren, and any entity offering goal-centered energy efficiency programs, must always respond prudently to changes in the market, whether that change results from federal efficiency standards, an informative EMV report, or a change in TRM values. The flexibility to adjust programs and budgets discussed above adequately buffers Ameren from an untoward degree of risk.

Q. What are your recommendations regarding Company flexibility?

A. The Commission should approve Ameren's second and third requests for NTG and TRM values to be available by the March 1st before a program year begins and maintaining a portfolio level TRC, as well as the first request for portfolio flexibility as modified by the OAG's proposal. The Commission should reject Ameren's fourth proposal to have the discretion to modify savings goals based on changes in NTG and TRM values.

III. BANKING

Q. What are the legislative policies related to banking?

A. Though I am not an attorney, it is my understanding that the Act does not mention the word banking. However, in the past year, the General Assembly amended the Act to allow ComEd and Ameren to either meet annual incremental savings goals in the applicable year or by showing that the total cumulative annual savings within a 3-year planning period is equal to the annual incremental savings requirement. 220 ILCS at 5/8-103(b). Though this language does not include the term banking, it essentially means that ComEd and Ameren can bank savings within the years included in a Plan filing, beginning with this Plan filing. So if Ameren exceeds the approved annual goal in PY 7, they can apply the MWH achieved beyond the PY 7 goal, toward either PY 8 or PY 9 goal achievement, if there is a shortfall in either year. While achievement in PYs 7 and 8 should constitute a third of the cumulative goal each, essentially, the "true-up" wouldn't be until the end of PY 9.

Q. What are the regulatory policies related to banking?

A. The Commission has allowed ComEd and Ameren to bank savings in all previous Plan filing dockets, including ICC Docket Nos. 07-0539, 07-0540, 10-0568, and 10-0570, although the language in those Final Orders varies, and I believe could be interpreted in different ways. Banking has also been discussed in ComEd and Ameren's annual energy efficiency compliance dockets, I believe to clarify policies surrounding banking, and the amount utilities can bank, including ICC Docket Nos. 10-0519, 10-0520, 11-0592, and 11-0593.

Q. What is the amount of savings that Ameren has banked so far?

A. While finalized estimates are not available, the OAG estimates that Ameren may have a total banked savings amount of 101,939 MWH at the end of PY 5. OAG Ex. 1.0 at 24. This is about half of one year of Ameren's proposed annual savings goals in this Plan filing. *Id*. at 24-25.

Q. Did Ameren account for these banked savings in this Plan filing?

A. No. Ameren did not mention the existence of the banked savings, or the impact the banked savings might have on goal achievement.

Q. What do other parties recommend related to banked savings?

A. The OAG states that Ameren could "effectively shut down its programs for six months and still achieve goals simply by drawing on this banked accumulated savings." OAG Ex. 1.0 at 25. The OAG states that if CFL carry-forward savings are include, the number of banked and carried forward savings could be closer to 100% of a single years goals. *Id*. at 27. The OAG proposes either increasing Ameren's goals by the amount of forecasted banked savings, or discontinuing Ameren's ability to apply banked savings from PYs 1-6 in PYs 7-9. *Id*. NRDC concurs, and states that either approach "achieves the same policy objective, which is to assure that Ameren continues to make every effort to get as close to the statutory savings goals and funding allows." NRDC Ex. 1.0 at 30.

Q. Do you agree with the OAG and NRDC's recommendations related to banked savings?

A. Yes. As illustrated by the OAG's estimate of the number of banked savings and CFL carry over savings, allowing Ameren to apply banked savings from PYs 1-6 in PYs 7-9 would not make Ameren any closer to meeting the statutory goals, and in fact, it would only move Ameren farther away from achieving the statutory goals. It is my understanding that part of the reason banking was approved in the 2007 and 2010 Plan filings was to ensure that Ameren and ComEd would continue to run programs even after goals had been achieved.

With the legislative change I discussed above, Ameren may now bank savings between PYs 7-9, and so that policy now addresses the potential issue of Ameren discontinuing programs after goals have been met. Additionally, as a member of the SAG, it is clear to me that it would be detrimental to stop any program in a year where the goal have been met, and start that program at the start of the following year, and that the utilities would not elect to do so. As I illustrated in my direct testimony, Ameren has a history of exceeding the Commission approved goals while not spending the entire budget under the rate cap, and still falling short of the statutory goals. It is apparent that Ameren could be achieving much greater savings than they have been in previous years. Ameren is now in its sixth year of offering statutory energy efficiency programs; there is no reason to continue to allow the Company to pad savings with banking when the Company is clearly capable of achieving greater savings without banking.

Q. What is your recommendation to the Commission?

A. I recommend that the Commission disallow the application of banked savings from PYs 1-6 to PYs 7-9. I also recommend that the Commission require Ameren to report on CFL carry-over savings, and adjust goals upward based on the number of CFL carry-over savings reported in EMV.

IV. PROGRAMS

A. Demand Response

Q. Do other intervenors address the demand response goals?

A. Yes. Staff does not oppose Ameren's proposal to count demand reduction savings from energy efficiency measures because "the definition of demand-response specified in the statute does not appear to require a demand-response ‘program’ be implemented.” Staff Ex. 1.0 at 14.

Q. What is the definition of demand response in the Act?

A. The Act states that demand response means “measures that decrease peak electricity demand or shift demand from peak to off-peak periods.” 220 ILCS 3855/1-10.

Q. Do you agree with Staff’s assessment of what the Act requires related to the demand response goals?

A. No. I am not an attorney, but I do not believe the Act explicitly states that the demand response goals can be met through the implementation of energy efficiency programs. Again, while I am not an attorney, I believe that the General Assembly’s establishment of a demand response portfolio standard unique from the EEPS means that the legislature intended for the electric utilities to establish unique demand response programs or measures.

Q. What do you recommend related to demand response?

A. I recommend that Ameren and the Commission adopt the recommendations in my direct testimony related to Conservation Voltage Reduction and/or the Power Smart Pricing program. ELPC also supports the implementation of a voltage optimization program. ELPC Ex. 2.0 at 15.

B. Smart Devices

Q. What are smart devices?

A. ELPC defines smart devices as hardware on the customer side of the meter that enable customers to reduce their energy use overall and at times of peak demand. ELPC Ex. 2.0 at 10. Smart devices are sometimes required for customers to participate in certain energy efficiency and dynamic pricing programs. *Id*. Examples of smart devices include thermostats, plugs, power strips, switches, smart chargers for electric vehicles, gateways, and in-home displays that can communicate with smart meters. *Id*. at 11. ELPC states that smart devices are critical for customers to fully realize the benefits of AMI, and CUB agrees.

Q. What recommendations to parties make related to smart devices?

A. ELPC recommends that Ameren establish interoperability standards for smart devices to communicate with smart meters and be willing to verify and register devices that a customer may purchase and install on their own. ELPC Ex. 2.0 at 11. ELPC also recommends that the Company "considering offering discounts or other incentives" for smart devices in areas of Ameren's service territory where AMI meters are being deployed. *Id*. ELPC goes on to provide more detailed recommendations for a program Ameren could employ regarding smart devices. *Id*. at 12. ELPC recommends that the Commission should order Ameren to spend the $5.13 million Emerging Technologies budget on a smart devices program.

Q. Do you support such a smart device program?

A. Yes. Ameren states the Company has earmarked a portion of the Emerging Technologies budget for a codes and standards pilot program. Ameren Ex. 1.1 (2nd Rev.) at 68. CUB supports funding the codes and standards pilot program through this fund, and recommends that the Commission order Ameren to spend the remainder of the Emerging Technologies funding on a smart device program as recommended by ELPC. Further, the Company should discuss its plans for this program with the SAG and with the Smart Grid Advisory Council ("SGAC").

C. On-Bill Financing

Q. What recommendations to parties make regarding innovative programs?

A. ELPC points out that Ameren relies almost exclusively on cash incentives, i.e., rebates for making prescriptive and custom upgrades, and states that there are other consumer incentives that are not included in the Plan. ELPC Ex. 1.0 at 5.

Q. What are some examples of those consumer incentives?

A. ELPC provides several examples of other types of consumer incentives, including on-bill financing, off-bill loans, revolving loans, performance contracting, tariffed installation programs, leasing, amortization, capitalization, and others. ELPC Ex. 1.0 at 8.

Q. Do you agree with ELPC's recommendations?

A. ELPC suggests innovative concepts that have overall not yet been tried in Illinois within the context of the EEPS programs. I would like to see Ameren report on benefits and barriers to implementing some of these programs in the Revised Plan I recommend Ameren file with the Commission, and perhaps pilot one of these programs if it appears likely that it would be cost-beneficial. I am most interested in ELPC's suggestion that Ameren consider offering an on-bill financing program. The General Assembly authorized on-bill financing programs for the gas and electric utilities. 220 ILCS 5/16-111.7; 220 ILCS 5/19-140. I participated in ICC Docket No. 11-0689, which approved an evaluation plan for the on-bill financing programs, and through the evaluation plans for that program, am aware that Ameren has maxed out the spending authorized by the PUA for that Company's program. No other utility has yet maxed out funding for the program, which suggests to me that Ameren's program was very successful (all the utilities in Illinois rely on the same underwriting criteria, bank, and financing mechanism for the program). There are several reasons I believe Ameren's program may have been successful: Ameren is the sole dual fuel utility in the state, and so for customers who receive both gas and electricity supply from Ameren, it may have been easier for the Company to market the program and it may have been easier for customers to participate. Additionally, I recall from the workshops held for ICC Docket No. 11-0689 that Ameren extensively trained the Company's contractor and ally network for promoting this program to customers. Finally, as a dual fuel utility, Ameren has been able to offer the most comprehensive suite of programs available under any utility program, even prior to some recent legislative changes that will enable utilities to offer financing on any EEPS measure.

Because Ameren already has a strong network in place for offering this program to customers, I recommend that Ameren report on whether the Company believes it would be cost-effective to include an iteration of the on-bill financing program through the EEPS in the Revised Plan the Company files with the Commission. CUB believes that on-bill financing, and similar loan programs, are essential for customers to be able to participate in energy efficiency. Since Ameren has maxed out funding for the on-bill financing program through Sections 5/16-111.7 and 5/19-140 of the Act, if it appears that it would be cost-effective for Ameren to include an on-bill financing program in this Plan filing, the Commission should order Ameren to do so.

CONCLUSION

Q. Please summarize your recommendations made in this rebuttal testimony.

A. In my direct testimony, I recommended that the Commission order Ameren to file a Revised Plan for Commission approval with increased therm and MWH goals, a modified demand response goal based on the number of customers who are eligible to become supply customers of Ameren, and a proposal for a demand response program. In this rebuttal testimony, I further recommend that:

- The Commission order Ameren to move the Standard CFL and Home Energy Reports programs to the IPA, and spend most of the funds freed up by moving those two programs to the IPA on either new or existing residential programs. These changes should be included in a Revised Plan that the Company files for Commission approval;

- The Commission approve Ameren's second and third requests for aligning the timing of the NTG and TRM values to the program years and maintaining a portfolio level TRC, as well as the first request for portfolio flexibility as modified by the OAG's proposal. The Commission should reject Ameren's fourth proposal to have the discretion to modify savings goals based on changes in the market;

- The Commission disallow the application of banked savings from PYs 1-6 to PYs 7-9. I also recommend that the Commission require Ameren to report on CFL carry-over savings, and adjust goals upward based on the number of savings reported in EMV;

- The Commission order Ameren to spend a portion of the Emerging Technologies funding on a smart device program as recommended by ELPC. Further, the Company should discuss its plans for this program with the SAG and the SGAC; and

- Ameren should report on whether the Company believes it would be cost-effective to include an iteration of the on-bill financing program through the EEPS in the Revised Plan the Company files with the Commission.

Q. Does this conclude your direct testimony?

A. Yes.