ST. LOUIS COUNTY MUNICIPAL LEAGUE

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Missouri Public Service Commission

Remarks at PSC hearing regarding Ameren rate increase - July 26, 2012

The St. Louis County Municipal League Members passed a resolution in March, 2012, opposing further rate increases that affect street lighting until a satisfactory method of installing cost effective and energy efficient street lighting is in place. I will provide a copy.

In the 2011 rate case, the commission ordered Ameren to move in this direction. The 2011 PSC staff reports notes the following benefits of modern lighting:

The LED lighting system is the most energy efficient SAL fixture available today.

Some advantages of LED lighting over traditional high-intensity discharge ("HID") lamps and

HPS lamps include:

- Improved efficiency;
- Longer lamp life;
- Improved night visibility due to higher color rendering, higher color temperature and increased luminance uniformity;
- Reduced maintenance costs;
- No mercury, lead or other known disposable hazards; and
- An opportunity to implement programmable controls (e.g. bi-level lighting)7

Other states have progressively moved to stimulate these cost and energy savings, and other benefits.

While Ameren has successfully sought increases in recent years that far exceed the generally cost of living, cities have suffered through the worst recession in generations. We do not ask to be treated better than other users, but to just allow local official to avail themselves of modern technologies.

Electrical usage is just a small part of each cities street lighting bill. Maintenance is also required to be provided by Ameren and this is a large cost of each monthly bill. The PSC should provide a mechanism for cities to explore competitive maintenance and ownership arrangements in conjunction with technologies that will save taxpayers' money and save energy. It is one thing to allow a monopoly on the energy itself; it is an entirely different thing to allow a monopoly on the maintenance of street lights too.

We appreciate the staff report and commission order regarding street lighting in the 2011 rate case and continue to urge the PSC to rigorously and creatively mandate Ameren cooperation in this regard.

Sincerely,

Tim Fischesser, Executive Director

L<u>itness</u> Exhibit No. 4 Date 7-26-12 Reporter Sm2-File No. E. R. 2018 - 0166 WHEREAS, municipalities in St. Louis County have attempted to encourage Ameren Missouri to replace street lighting fixtures with technology such as LED and Ameren has failed to collaboratively address the issue on a wide-spread basis; and

WHEREAS, even with such requests from the municipalities, Ameren did not include a proposal to establish a rate for high efficiency fixtures with its recent or current requests filed with the Public Service Commission for a rate increase;

NOT, THEREFORE, BE IT RESOLVED that the St. Louis County Municipal League opposes the proposed rate increase and respectfully submits that the Public Service Commission should deny the request for a rate increase and instruct Ameren to establish a rate schedule for municipalities so that they will reduce both street lighting costs and energy use.

Submitted by the Executive Board

Endorsed by the Executive Board: March 9, 2012 Approved by the Membership: March 22, 2012