

**BEFORE THE PUBLIC SERVICE COMMISSION
OF THE STATE OF MISSOURI**

In the Matter of Union Electric Company d/b/a)
Ameren Missouri's 3rd Filing to Implement)
Regulatory Changes in Furtherance of Energy)
Efficiency as Allowed by MEEIA) File No. EO-2018-0211

**AMEREN MISSOURI'S
REPORT OF PARTICIPATION DATA BY ZIP CODE**

COMES NOW Union Electric Company d/b/a Ameren Missouri ("Ameren Missouri" or "Company") and, pursuant to Paragraph 9 of the *Stipulation and Agreement* ("*Stipulation*") submitted to the Missouri Public Service Commission ("Commission") on October 25, 2018, and approved by the Commission on December 5, 2018, submits its *Report of Participation Data by Zip Code* ("*Report*"), attached hereto.

1. Paragraph 9 of the *Stipulation* states as follows (footnote included):

9. Energy Efficiency Equity Baseline Data. Within 60 days of the approval of this *Stipulation*, Ameren Missouri will file updated participation data by zip code for Schedule WRD-SR6 to the surrebuttal testimony of Company witness Bill Davis to include program-level participation data within this docket. Further, the following information will be included in the annual EM&V reports for MEEIA 2019-21:

- Aggregated participation data by program and by zip code;⁶ and
- Aggregated energy consumption data by zip code.

⁶ The Company will provide this information based on 5-digit zip codes, but will evaluate the feasibility and practicality of expanding this reporting to 5+4 zip codes.

The Report attached to this pleading contains program-level participation data by zip code in compliance with Paragraph 9.

2. In addition to providing the attached *Report*, Ameren Missouri also provides information in this cover pleading in compliance with footnote 6 to Paragraph 9. Footnote 6 indicates that the Company will examine the "feasibility and practicality" reporting not just by 5-digit zip code, but by 5+4 zip codes. Unfortunately, this does not appear to be practicable, and further may be subject to change which could skew the results of any analysis based on that report.

3. The +4 zip code is intended to reflect a current postal route. The first two numbers of the +4 to a zip code narrow the scope to a specific delivery sector, while the second two numbers reflect a segment within that delivery sector.¹ If there is a large office or apartment building, it may be the only facility that holds a specific +4 zip code. The same is also possible for a single house within a larger geographic area. In fact, companies are able to request a unique +4 code.² The Company is wary of attempting to appropriately identify all potential single-customer +4 zip codes, which could become cumbersome and may not effectively identify all such customers. Further, the Company cannot know that identified customers would provide the necessary consent to provide this information. Finally, the Company notes that since the +4 is intended to reflect a current postal route, and postal routes are subject to change, customers' +4 designations are subject to change.³ If these +4 codes change, then any analysis performed on the data provided may reflect different customers over time, skewing that analysis' results.

¹ <https://pe.usps.com/text/dmm300/602.htm>

² <https://usps.force.com/faq/s/article/ZIP-Code-The-Basics>

³ <https://usps.force.com/faq/s/article/ZIP-Code-The-Basics>

WHEREFORE, the Company provides the information contained in this pleading and its attachment in response to Paragraph 9 of the *Stipulation* in this proceeding.

Respectfully Submitted,

/s/ Paula N. Johnson

Paula N. Johnson, #68963
Senior Corporate Counsel
1901 Chouteau Avenue, MC 1310
P.O. Box 66149
St. Louis, MO 63166-6149
(314) 554-3533 (phone)
(314) 554-4014 (facsimile)
ameremoservice@ameren.com

**ATTORNEY FOR UNION ELECTRIC
COMPANY d/b/a AMEREN MISSOURI**

CERTIFICATE OF SERVICE

I do hereby certify that a true and correct copy of the foregoing document has been hand-delivered, transmitted by e-mail or mailed, First Class, postage prepaid, this 4th day of January, 2019 to counsel for all parties on the Commission's service list in this case.

/s/ Paula N. Johnson