

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

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

**REQUEST TO REVISE**  
**TECHNICAL RESOURCE MANUAL AND DEEMED SAVINGS TABLE**  
**AND MOTION FOR EXPEDITED TREATMENT**

COMES NOW Union Electric Company d/b/a Ameren Missouri (“Ameren Missouri” or “Company”), and submits this *Request to Revise Technical Resource Manual and Deemed Savings Table and Motion for Expedited Treatment* (“*Request*”) to the Missouri Public Service Commission (“Commission”) for approval. In support thereof, the Company respectfully states as follows:

1. On October 25, 2018, Ameren Missouri and certain other parties to this proceeding submitted an unopposed *Stipulation and Agreement* (“*Agreement*”) to the Commission for approval. After receiving no objections, the Commission issued its *Order Approving Non-Unanimous Stipulation and Agreement and Granting Waivers* on December 5, 2018. That *Agreement* included the submission of a revised *Ameren Missouri 2019-21 MEEIA Energy Efficiency Plan* (“*Report*”) and its associated Appendices A through N.

2. In approving the *Agreement*, the Commission also approved a Company-specific Technical Resource Manual (“TRM”) (Appendices G, H, and I to the *Report*) and Deemed Savings Table (Appendix F to the *Report*). The TRM serves as the source for measure savings formulas and default inputs to use in the absence of utility-specific evaluation results. The TRM, and certain updates thereto, are also used to calculate throughput disincentive on a prospective basis (subject

to DSIM<sup>1</sup> true-up provisions). The Deemed Savings Table represents the application of the formulas in the TRM for discrete measures that are being offered, and also reflect the inputs into those formulas based on utility-specific evaluation results. Accordingly, revisions to the TRM can necessitate revisions to the Deemed Savings Table.

3. Ameren Missouri's 2019-21 Energy Efficiency Plan (“MEEIA 2019-21”) anticipates a dynamic TRM with annual updates responsive to evaluation, measurement, and verification (“EM&V”) results. See Ameren Missouri's *Report* submitted as part of the *Agreement* on October 25, 2018, at pages 40 – 41 for more information regarding this process. Ameren Missouri previously requested revisions to the TRM and Deemed Savings tables, and the Commission approved the same, on three prior occasions:

<b>Table 1 – Prior TRM and Deemed Savings Table Updates</b>	
<b>Date Revisions Requested</b>	<b>Data Approved by Commission</b>
December 31, 2018	February 27, 2019
November 15, 2019	December 11, 2019
June 19, 2020	July 8, 2020

4. It is important that the TRM always reflects current information available based on final program evaluations and current program implementation objectives. Consistent with prior filings, Ameren Missouri has identified several revisions to the TRM and the Deemed Savings Tables that are appropriate for the program year beginning 2021. The primary focus of this TRM update is to include the final evaluated results from the 2019 program year. Updates also include the following::

- Minor modifications to align TRM measures within the deemed savings tables to current and planned program offerings

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<sup>1</sup> “Demand-side Investment Mechanism.”

- Examples include the addition of variations of existing offerings for select measures such as, Income Eligible kits, Appliance Recycling kits and direct install measures.
- Updated Incremental cost inputs for residential learning thermostats, ductless heat pumps, and direct install pipe insulation measures.
- Certain clean-up items, including formatting and terminology that does not impact associated measure savings/cost values, three algorithm corrections that had very minimal savings impacts to three measures; and
- Updates to references regarding the Energy Independence Security Act (EISA) lighting standards. These changes are necessary to reflect the current status of Federal Regulations, as of this filing date.

A description of these revisions and their rationale are included in Attachment 1 to this *Request*.

These revisions apply to all measure groups and reflect the input and review of the associated evaluation contractors for each program year. The PY2019 results are sourced from the relevant PY2019 Evaluation Reports as provided by the evaluation contractor (Opinion Dynamics). Note that the inclusion of the PY2019 results necessitates updates to all measure groups within the TRM and Deemed Savings table.

Ameren Missouri provided these proposed revisions to Commission Staff on October 12, 2020. Commission Staff provided communication to Ameren Missouri that based on their review to date, they do not have any concerns at this time. In addition, the implementation team and the evaluators aided in gathering the data and documents used by the Company, and have been provided with these resulting updates. Additionally, the measure changes have undergone a cost effectiveness analysis, and will not require any adjustment of the portfolio's goals.

5. Ameren Missouri therefore offers a revised TRM and Deemed Savings Table for the Commission's approval. The revisions are found and explained in the attachments referenced in the following Table 2:

<b>Table 2</b>	
<b>List of Attachments Encompassing Revisions to TRM and Deemed Savings Table<sup>2</sup></b>	
<b>Name</b>	<b>Description</b>
Appendix F – Deemed Savings Table	Clean copy of revised Deemed Savings Table in PDF format
Appendix F - Deemed Savings Table_Clean	Clean copy of revised Deemed Savings Table in executable Excel format
Appendix F - Deemed Savings Table_Redline	Redlined copy of Deemed Savings Table in Excel format
Appendix H – TRM-Vol 2_Bus	Clean copy of revised Appendix H – TRM Volume 2 - Business
Appendix H – TRM-Vol 2_Bus_Redline	Redlined version of revised Appendix H - TRM Volume 2 – Business to illustrate location of revisions
Appendix I – TRM-Vol 3_Res	Clean copy of revised Appendix I – TRM Volume 3 - Residential
Appendix I – TRM-Vol 3_Res_Redline	Redlined version of revised Appendix I - TRM Volume 3 – Residential to illustrate location of revisions

6. Finally, Ameren Missouri requests expedited treatment of this *Request*. The Company requests approval by November 16, 2020, so that these revisions can go into effect with the next applicable program year. This time is necessary to update relevant data tracking and reporting systems by January 1, 2021. A January 1, 2021 effective date is necessary to align program tracking data and program evaluation data. And as noted in Paragraph 2, a January 1, 2021 effective date is similarly important to ensure that prospective throughput disincentive funds are collected using the most current and accurate savings estimate.

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<sup>2</sup> While the TRM is made of up three volumes (Appendices G through I), only Appendix H and I required revision.

**WHEREFORE**, Ameren Missouri requests the Commission issue an order approving the proposed revisions to the TRM (Appendix H & I) and Deemed Savings Table (Appendix F) in an expedited manner so that the revised TRM provisions may go into effect on January 1, 2021.

Respectfully submitted,

*/s/ Paula N. Johnson*

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**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 15<sup>th</sup> day of October, 2020, to counsel for all parties on the Commission's service list in this case.

**/s/ Paula N. Johnson**  
Paula N. Johnson