

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

In the Matter of Union Electric Company d/b/a)
Ameren Missouri’s 2nd Filing to Implement) File No. EO-2015-0055
Regulatory Changes in Furtherance of Energy)
Efficiency as Allowed by MEEIA.)

REQUEST TO REVISE
TECHNICAL RESOURCE MANUAL

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

1. On February 5, 2016, Ameren Missouri and certain other parties to this proceeding submitted a *Non-Unanimous Stipulation and Agreement* (“*Agreement*”) to the Commission for approval. After receiving no objections, the Commission issued its *Order Approving Non-Unanimous Stipulation and Agreement* on February 10, 2016.
2. In approving the *Agreement*, the Commission also approved a Company-specific Technical Resource Manual (“TRM”). The TRM sets forth measures, the level of energy savings, incremental costs and effective, useful lives associated with each measure. The TRM, and certain updates thereto, are also used to calculate throughput disincentive on a prospective basis (subject to DSIM¹ true-up provisions).
3. Ameren Missouri's 2016-18 Energy Efficiency Plan (“MEEIA Cycle 2”) anticipates a dynamic TRM with annual updates responsive to evaluation, measurement, and verification (“EM&V”) results as well as the changing energy efficiency standards and

¹ “Demand-side Investment Mechanism”

environment. See Ameren Missouri's MEEIA Cycle 2 Report submitted to the Commission on December 22, 2014, at pages 60-63 for more information regarding this process.

4. Two factors have driven the need for updates to the TRM:
 - Ameren Missouri's 2016 EM&V results and the subsequent *Non-Unanimous Stipulation and Agreement Settling Final EM&V for the 2016 MEEIA Cycle 2 Program Year ("2016 EM&V Stipulation")* submitted to the Commission on September 13, 2017, and the Order approving that agreement issued September 27, 2017; and
 - Recent changes in the marketplace.

Ameren Missouri provided its proposed TRM revisions to MEEIA Cycle 2 stakeholders, and received no feedback. The updates have been reviewed by both the implementation team and the evaluators. 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 for the Commission's approval.

These proposed revisions:

- Remove language and descriptions of iTRL, which is being deactivated;²
- Revises the Pipe Insulation formula as agreed in the *2016 EM&V Stipulation*;
- Adds SEER 16 CAC measures for the Multi-Family;
- Splits existing Electronically Commutated Motors ("ECMs") into two separate measures to match the incentive structures;³ and
- Updates incremental costs for Heat Pump Water Heaters.

The revisions are found and explained in the attachments referenced in the following table.

² Ameren Missouri is in the process of migrating the TRM to a format similar to the Statewide TRM.

³ There will now be one for ECMs that are bundled with new systems (in AHRI rating), and one for ECMs that replace fans in existing systems (not in AHRI rating).

Attachment	Name	Description
A	Revised <i>TRM Appendix 11.17.2017</i>	Final, clean copy of revised TRM
B	Revised <i>TRM Appendix 11.17.2017 Redline</i>	Redlined copy of revised TRM so revisions can be identified
C	TRM Changes 11.1.2017	Information in spreadsheet format outlining and providing support for the proposed TRM Measure additions
D	Extract_I ² TRL_Measure_Download	Data extract of the i ² TRL prior to TRM updates
E	Efficient Products_IncCost update HPWaterHeater	Supportive incremental cost update for Heat Pump Water Heaters

5. Based on the information provided herein, Ameren Missouri asks the Commission to approve the TRM as revised.

WHEREFORE, Ameren Missouri requests the Commission issue an order approving the proposed revisions to the TRM.

Respectfully submitted,

/s/ Paula N. Johnson
Paula N. Johnson, #68963
 Senior Corporate Counsel
 Ameren Services Company
 P.O. Box 66149, MC 1310
 St. Louis, MO 63166-6149
 (314) 554-3533 (phone)
 (314) 554-4014 (fax)
AmerenMOService@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 17th day of November, 2017, to counsel for all parties on the Commission's service list in this case.

/s/ Paula N. Johnson