

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

In the Matter of Union Electric)	
Company d/b/a Ameren Missouri's)	
3 rd 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 DSIM¹ 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 MEEIA Cycle 3 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 a TRM revision on December 31, 2018, which was approved by the Commission on February 27, 2019, in advance of the start of the first program year for MEEIA 2019-21.²

4. After examination, Ameren Missouri has determined that several revisions to the TRM and the Deemed Savings Table are appropriate for the program year beginning 2020. A description of these revisions and their rationale are included in Attachment 1 to this *Request*. These revisions apply to all measure groups. In summary, the following overarching factors are driving the need for these updates:

- Program Year ("PY") 2018 results;
- HVAC measure modifications, including:
 - Reductions in Effective full load hours (EFLH);
 - Updated Incremental cost inputs, citing to publicly available data;
- Multifamily measure modifications, including:
 - Addition of comprehensive envelope measures, which include lower EFLH and account for the interactive effects resulting from the installation of comprehensive envelope or building shell measures;

¹ "Demand-side Investment Mechanism."

² The 2019 program year began March 1, 2019; subsequent program years for this MEEIA cycle will run from January 1 through December 31 each year.

- Certain clean-up items, including formatting and terminology that does not impact associated measure savings/cost values .

These revisions reflect the input and review of the associated evaluation contractors for each program year. The PY2018 results are sourced from the relevant PY2018 Evaluation Reports as provided by Cadmus and ADM, the evaluation contractors at that time. Note that the inclusion of the PY2018 results necessitates updates to all measure groups within the TRM and Deemed Savings table. The modifications for HVAC measures and Multifamily measures were developed through review and recommendation by the current evaluation contractor, Opinion Dynamics Consulting. A research memo developed by Opinion Dynamics Consulting, which supports the requested revisions, is included with this *Request* as Attachment 2.

Ameren Missouri provided these proposed revisions to MEEIA 2019-21 stakeholders on November 7, 2019, and received no feedback. Commission Staff provided communication to Ameren Missouri that based on their review to date, they support these revisions. In addition, the implementation team and the evaluators aided in gathering the data and workpapers 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:

Table 2	
List of Attachments Encompassing Revisions to TRM and Deemed Savings Table³	
Name	Description
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 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 January 1, 2020, so that these revisions can go into effect with the next applicable program year. A January 1, 2020 effective date is necessary to align program tracking data and program evaluation data. And as noted in Paragraph 2, a January 1, 2020 effective date is similarly important to ensure that prospective throughput disincentive funds are collected using the most current and accurate savings estimate.

WHEREFORE, Ameren Missouri requests the Commission issue an order approving the proposed revisions to the TRM (Appendix I) and Deemed Savings Table (Appendix F) in an expedited manner so that the revised TRM provisions may go into effect on January 1, 2020.

³ While the TRM is made of up three volumes (Appendices G through I), only Appendix I required revision.

Respectfully submitted,

/s/ Paula N. Johnson

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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 15th day of November, 2019, to counsel for all parties on the Commission's service list in this case.

/s/ Paula N. Johnson