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

In the Matter of Union Electric Company d/b/a Ameren ) Missouri's Filing to Implement Regulatory Changes in ) File No. EO-2012-0142 Furtherance of Energy Efficiency as allowed by MEEIA. )

#### NOTIFICATION

COMES NOW Union Electric Company d/b/a Ameren Missouri (Ameren Missouri or Company) and, pursuant to the terms of the *Unanimous Stipulation and Agreement Resolving Ameren Missouri's MEEIA Filing (Stipulation)*, submits the following:

1. The *Stipulation* requires Ameren Missouri to file a notice in this case no less than five business days prior to making a change in its measure and/or incentive amount offering.<sup>1</sup>

2. Concurrently with filing this Notification Ameren Missouri is making a tariff filing relating to its Energy Star<sup>®</sup> New Homes Program that is designed to limit its availability to those homes that reserve a rebate prior to the effective date of the new tariff (June 21, 2014). This tariff filing is being made because it has been determined that the Program is not cost-effective. A copy of the Company's report discussing the lack of cost-effectiveness of the Program is included with this Notification.

3. Consequently, the Company's currently-on-file Residential Energy Efficiency Measures and Incentive listing has been modified to delete the information relating to the Energy Star<sup>®</sup> New Homes Program effective June 21, 2014. A copy of the revised listing is included with this filing.

4. In addition, the Company's web pages for energy efficiency will be modified (effective June 21, 2014) to remove pages or make other modifications necessary to reflect the

<sup>&</sup>lt;sup>1</sup> File No. EO-2012-0142, Unanimous Stipulation and Agreement Resolving Ameren Missouri's MEEIA Filing, p. 14.

discontinuance of the Program. Copies of the web pages as they will appear starting June 21, 2014 are also included with this Notification.

4. The foregoing has been discussed with the Staff, Public Counsel and the Division

of Energy who have expressed their support of these changes.

WHEREFORE, Ameren Missouri respectfully files this *Notice* in compliance with the terms of the *Unanimous Stipulation and Agreement Resolving Ameren Missouri's MEEIA Filing*.

Respectfully submitted,

UNION ELECTRIC COMPANY, d/b/a Ameren Missouri

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#### /s/ James B. Lowery

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#### ATTORNEYS FOR UNION ELECTRIC COMPANY d/b/a AMEREN MISSOURI

#### **CERTIFICATE OF SERVICE**

The undersigned certifies that true and correct copies of the foregoing have been e-mailed

to the service list of record this 22nd day of May, 2014.

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# Cost Effectiveness Review Construction Savers Program - 2013 Ameren Missouri

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Prepared for Ameren Missouri

Prepared by R. E. Willen

Manager, DSM Energy Efficiency/Demand Response Corporate Planning Ameren Services

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May 20, 2014

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### **SUMMARY:**

The performance of the Construction Savers Program was assessed for Program Year 2013 by the Evaluation Measurement and Verification (EM&V) to identify the cost effectiveness of the program as delivered. The result of this assessment indicated that the savings associated with this program were considerably lower than those expected, which ultimately resulted in a cost effectiveness assessment which showed that the total cost to deliver the program exceeded the benefits of the program as delivered.

In response, the Ameren Missouri implementation team requested a review of the program parameters, using the assessment information provided by EM&V, with adjustments to parameters that were under the implementation team control, to determine if it were possible to adjust the delivery of the program to arrive at a program delivery which yielded cost effective results.

Adjustments that were identified and applied proved insufficient in producing results that indicate a cost effective program.

### **BACKGROUND:**

The Construction Savers Program was designed to encourage home builders to energy efficient homes, typically Energy Star certified homes. The program implementation team worked with an implementation contractor to create a program that would work towards this goal

The program had some initial difficulties enrolling home builders. Following implementation of program modifications, home builder participation improved. However, the initial low enrollment ultimately resulted in approximately 100 homes being constructed under the program during 2013, considerably below the 230 homes that were anticipated to be delivered.

As mentioned in the Summary, the cost effectiveness assessment results (total resource cost test, or TRC) showed that the program, as delivered, was not cost effective. As part of the cost effectiveness evaluation, the EM&V contractor assigned an overall realization rate (RR) of 47.2% to the measure savings and a Net-to-Gross (NTG) value of 28.3% to the program deliveries.

The RR value was developed using building simulation modeling results of base and efficient homes. Scaling of home savings was then performed to match the results achieved through modeling. This is a parameter that is difficult for the implementation team to manipulate.

The NTG value was developed by determining the level of Free Ridership and Spillover. The implementation team believes that they can modify program design to improve the NTG.

### ANALYSIS:

The Ameren Missouri implementation team requested that the program cost effectiveness be reassessed using parameters that could be manipulated. These parameters included:

- Change the NTG value from 28.3% to 100%.
  - It was felt that the delivery of the program could be modified to reduce or eliminate Free Ridership in the program.
  - A test of this presumption was performed by using the EM&V contractor's DSMore workbook for the analysis, and revising the NTG values within this workbook to 100%, and reanalyzing the program.
- Change the number of homes delivered to 230 from 100
  - It was felt that with the program would become more cost effective if it had delivered the planned number of homes.
  - A test of this presumption was performed by using the EM&V contractor's DSMore workbook for the analysis, and increasing the participation levels within the program by a factor of 2.3 to account for the increase in home deliver from 100 to 230, and reanalyzing the program.

### **RESULTS:**

A review of the EM&V DSMore Batchtool used to perform the cost effectiveness analysis shows a discrepancy in the savings associated with the ASHP SEER 15 measure. The issue is illustrated within the table below:

Source	Measure Name	Ex Ante kWh/yr	Ex Post kWh/yr	Realization Rate	Measure Cost
EM&V NewHome (Row 11)	ASHP- SEER 15 Replace at Fail Elec Resist Furnace	REW calc @ 1157	545.9	47.2	\$1,074
Dashboard - Feb 20, 2014 (Row 10)	ASHP - SEER 15 Replace at Fail with ASHP	1157	545.9	47.2	N/A
MEEIA NewHome (Row 6)	ASHP - SEER 15 Replace at Fail with ASHP	1638.6	Estimate @ 773.1	47.2	\$522
MEEIA NewHome (Row 9)	ASHP- SEER 15 Replace at Fail Elec Resist Furnace	13906.7	Estimate @ 6561.4	47.2	\$1,074
MEEIA HVAC (Row 6)	ASHP - SEER 14 Replace at Fail with ASHP	1157.5	546.1	47.2	\$411

In summary, the dashboard identifies savings associated with a SEER 14 measure for a SEER 15 measure. Also, the EM&V evaluation used the electric resistance measure incremental cost, which is about double the cost associated with the dashboard described measure.

A review of the EM&V draft evaluation report for the ConstructionSavers program, Table 17, appears to indicate that the actual MEEIA HVAC description of the measure (efficient measure at 14 SEER) is the correct description – the savings are in agreement. However, the cost needed to be corrected to \$411 rather than \$1,074.

All other modeled cost, Realization Rate and NTG data appear to be consistent with the report.

This measure was corrected for the analyses that were requested – ASHP is identified in the analyses as SEER 14 with \$411 incremental cost and no change in savings.

The TRC analysis results that were calculated are shown within the table below:

Analysis	Program TRC
EM&V 3/3/2014 Analysis (Confirmed as the final EM&V DSMore analysis of the program)	0.18
Corporate Planning – Modify EM&V Analysis – fix ASHP, 3/18/14	0.18
Corporate Planning – Modify EM&V Analysis – fix ASHP, NTG = 1, 3/18/14	0.50
Corporate Planning – Modify EM&V Analysis – fix ASHP, NTG = 1, Participant multiplied by 2.3, 3/18/14 Note: This required increasing the incentive as well, since more incentives would be required to deliver the program – however, held the admin at prior level.	0.82

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### **CONCLUSION:**

Unless there is a significant change in the incremental costs associated with the program measures (lower incremental costs) this program will not be cost effective as modified for delivery within these analyses.

### **RECOMMENDATIONS:**

With the TRC analysis results being less than 1 for all analyses performed, the program should be discontinued.

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#### **Residential Energy Efficiency Program Measures and Incentives**

#### Program Measures as listed are for the following Residential Programs:

- 1. Energy Efficient Lighting
- 2. Energy Efficient Products
- 3. Appliance Recycling
- 4. ENERGY STAR<sup>®</sup> New Homes
- 5. Low Income
- 6. New HVAC and Tune-up

Measures and Incentive amounts for the Home Energy Performance Pilot will be provided prior to program launch, March 1, 2013.

#### **Energy Efficient Lighting Incentives for Measures identified in the TRM**

Energy Efficient Lighting Measures	Low Range Incentive	High Range incentive
CFL - 13W (60W incandescent equivalent) PRE-EISA	0.50	2.50
CFL - 13W (60W incandescent equivalent) POST-EISA	0.50	2.50
CFL - 18W (75W incandescent equivalent) POST-EISA	0.50	2.50
CFL - 23W (100W incandescent equivalent) POST-EISA	0.50	2.50
CFL - High Wattage Bulbs	1.00	6.00
CFL - Specialty Bulbs	1.00	7.50
CFL - Fixtures	5.0	15.00
CFL - Reflector	1.95	8.00
LED - 10.5W Down light E26 Light Bulb	5.00	15.00
LED - 12W Dimmable Light Bulb	5.00	15.00
LED - 15W Flood Light PAR30 Bulb (POST-EISA)	5.00	15.00
LED - 18W Flood Light PAR38 Bulb (POST-EISA)	5.00	15.00
LED - 8W Globe Light G25 Bulb	5.00	15.00
Occupancy Sensor	9.15	15.00

#### **Energy Efficient Product Incentives for Measures identified in the TRM**

Energy Efficient Product Measures	Low Range	High Range
	Incentive	Incentive
Energy Star Room AC	10.00	50.00
Heat Pump Water Heaters	125.00	700.00
Pool Pump and Motor Single Speed	10.00	75.00
Pool Pump and motor w auto controls - multi speed	85.00	300.00
Setback thermostat - full setback_SF	10.00	50.00
Setback thermostat - moderate setback_SF	10.00	50.00
Smart Strip plug outlet	6.00	25.00

#### **Residential Energy Efficiency Program Measures and Incentives**

Energy Efficient Product Measures	Low Range Incentive	High Range Incentive
VFDs on Residential Swimming Pool Pumps	60.00	250.00
Water Heater - Electric	10.00	50.00
Low Flow Faucet Aerator - Electric water heater	1.50	5.00
Low Flow Showerhead - Electric water heater	3.00	15.00
Pipe Wrap - Electric water heater	1.00	7.50
CFLs 13W	.50	2.50
*When measures are part of a bundled product kit, shipping and handling is not included in above amounts		

#### Appliance Recycling Program Incentives for Measures identified in the TRM

Appliance Recycling Measures	Incentive	
Dehumidifier recycling	0	
Freezer Recycling	F0.00	
Refrigerator Recycling	50.00	
Room AC recycling	0	

#### ENERGY STAR<sup>®</sup> New Homes Incentives -This program was discontinued as of June 21, 2014

Incentives are paid to participating Builders on a whole house basis. There are two payment tiers:

#### Tier One High Performance Homes:

- o Insulation requirements for Walls, Floors and Ceilings are enforced and signed by HERS Rater
- Requires cracks in building envelope to be fully sealed
- Builder submits HERC certificate and AHRI and REM

#### Tier Two ENERGY STAR Homes:

- Requires ENERGY STAR qualified light bulbs in 80 percent of light locations
- o ASHRAE 62.2 Ventilation Requirements in full effect
- All Four ENERGY STAR Checklists (Thermal Enclosure, HVAC System Quality Checklists for Contractors and Raters, and Water Management System Checklist) enforced and signed by HERS Rater
- ENERGY STAR Certificate, AHRI and REM also submitted
- → Requires certification for HVAC contractor

#### Low Income Incentives for Measures identified in the TRM

Low Income Measures	Low Range Incentive	High Range Incentive	Incentive Amount
AC - Energy Star Room_MF	348.00	479.00	
AC - Energy Star Room - Thru-Wall_MF	348.00	636.00	
CFL - 13W_MF PRE-EISA_MF			5.00
CFL - 13W_MF POST-EISA_MF			5.00

### **Residential Energy Efficiency Program Measures and Incentives**

Low Income Measures	Low Range	High Range	Incentive Amount
	Incentive	Incentive	
CFL - 18W (75W incand equiv) POST-EISA_MF			5.50
CFL - 23W (100W incand equiv) POST-EISA_MF			5.75
Energy Star Refrigerator_MF	525.00	820.00	
HVAC Maintenance and Tune-up_MF			100.00
LED - 10.5W Downlight E26 Light Bulb_MF			23.14
LED - 12W Dimmable Light Bulb_MF			40.04
LED - 15W Flood Light PAR30 Bulb (Post-EISA)_MF			42.90
LED - 18W Flood Light PAR38 Bulb (Post-EISA)_MF			42.90
LED - 8W Globe Light G25 Bulb_MF			36.40
Low Flow Faucet Aerator _MF	13.00	15.00	
Low Flow Showerhead_MF	37.00	48.50	
Pipe Insulation_MF			1.50
RCA 10% improvement_MF			105.00
Setback thermostat - full setback_MF			100.00
Smart Strip plug outlet_MF			38.49
Water Heater Blanket_MF			58.31
AC - Energy Star Room_SF	363.00	483.00	
AC - Energy Star Room - Thru-Wall_SF	363.00	641.50	
CFL - 13W_MF PRE-EISA_SF			5.50
CFL - 13W_MF POST-EISA_SF			5.50
CFL - 18W (75W incand equiv) POST-EISA_SF			6.00
CFL - 23W (100W incand equiv) POST-EISA_SF			6.25
HVAC Maintenance and Tune-up_SF			100.00
LED - 10.5W Downlight E26 Light Bulb_SF			24.00
LED - 12W Dimmable Light Bulb _SF			40.04
LED - 15W Flood Light PAR30 Bulb (Post-EISA)_SF			42.90
LED - 18W Flood Light PAR38 Bulb (Post-EISA)_SF			42.90
LED - 8W Globe Light G25 Bulb_SF			37.00
Low Flow Faucet Aerator _SF	15.00	17.00	
Low Flow Showerhead_SF	38.00	49.00	
Pipe Insulation_SF			1.60
RCA 10% improvement_SF			105.00
Setback thermostat - full setback_SF			105.00
Smart Strip plug outlet_SF			44.97
Water Heater Blanket_SF			58.81

### **Residential Energy Efficiency Program Measures and Incentives**

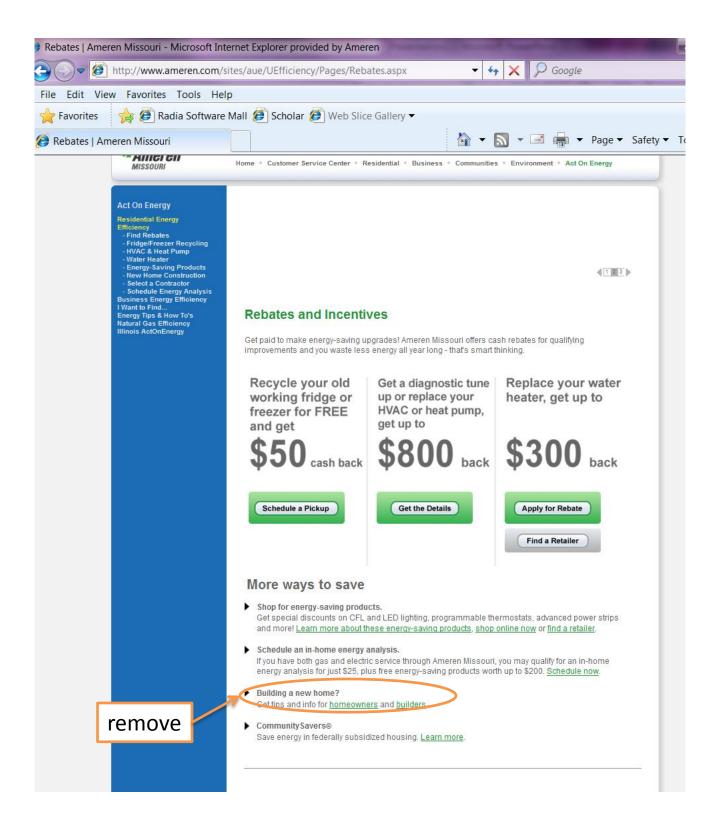
#### New HVAC and Tune-up Incentives for Measures identified in the TRM Rev 1. 5/5/14

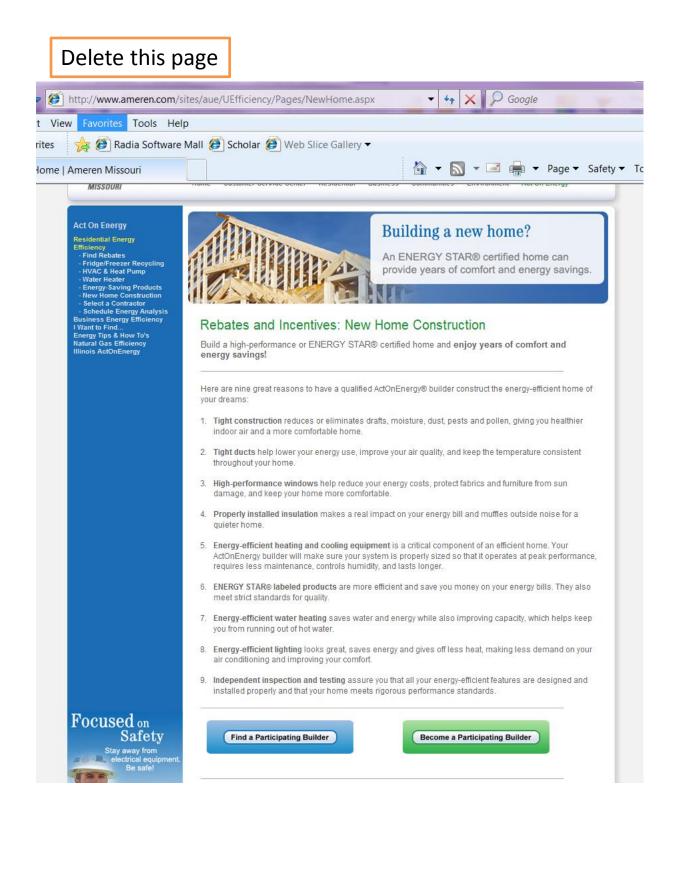
HVAC Measure	Customer-facing name	Incentive
ASHP - SEER 14 ER with ASHP ERbegin		
ASHP - SEER 14 ER with ASHP ERend	ASHP SEER 14	400
ASHP - SEER 14 Replace at Fail with ASHP	Replacing ASHP	
ASHP - SEER 14 ER Elec Resist Furnace ERbegin	ASHP SEER 14	
ASHP - SEER 14 ER Elec Resist Furnace ERend	Replacing Electric	600
ASHP- SEER 14 Replace at Fail Elec Resist Furnace	Furnace	
ASHP - SEER 15 ER with ASHP ERbegin		
ASHP - SEER 15 ER with ASHP ERend	ASHP SEER 15	450
ASHP - SEER 15 Replace at Fail with ASHP	Replacing ASHP	
ASHP - SEER 15 ER Elec Resist Furnace ERbegin	ASHP SEER 15	
ASHP - SEER 15 ER Elec Resist Furnace ERend	Replacing Electric	700
ASHP- SEER 15 Replace at Fail Elec Resist Furnace	Furnace	
ASHP - SEER 16+ ER with ASHP ERbegin		
ASHP - SEER 16+ ER with ASHP ERend	ASHP SEER 16+	550
ASHP - SEER 16+ Replace at Fail with ASHP	Replacing ASHP	
ASHP - SEER 16+ ER Elec Resist Furnace ERbegin		
ASHP - SEER 16+ ER Elec Resist Furnace ERend	ASHP SEER 16+	
ASHP- SEER 16+ Replace at Fail Elec Resist	Replacing Electric Furnace	800
Furnace	Fuillace	
CAC - SEER 14 ERbegin	CAC SEER 14	
CAC - SEER 14 ERend	Existing unit is still	300
	working	
CAC - SEER 14 Replace at Fail	CAC SEER 14	150
	Existing unit is not working	150
CAC - SEER 15 ERbegin	CAC SEER 15	
CAC - SEER 15 ERend	Existing unit is still	400
	working	
CAC - SEER 15 Replace at Fail	CAC SEER 15	
	Existing unit is not	175
	working	
CAC - SEER 16+ ERbegin	CAC SEER 16+ Existing unit is still	475
CAC - SEER 16+ ERend	working	4/3
CAC - SEER 16+ Replace at Fail	CAC SEER 16+	
F	Existing unit is not	200
	working	

HVAC Measure	Customer-facing name	Incentive
Concept 3 Continuous Fan Replace at Fail	ECM Motor	
Concept 3 Installations Auto Fan ERbegin	Included in AHRI	
Concept 3 Installations Auto Fan ERend	Efficiency Rating	50 or
Concept 3 Installations Auto Fan Replace at Fail	Or ECM Motor	100
Concept 3 Installations Continuous Fan ERBegin	ECM Motor Not included in AHRI	
Concept 3 Installations Continuous Fan EREnd	Efficiency Rating	
DFHP 14 SEER		150
DFHP 15 SEER	Dual Fuel Heat Pump	175
DFHP 16 SEER		200
GSHP - SEER 14+ ER ASHP with GSHP ERbegin		
GSHP - SEER 14+ ER ASHP with GSHP ERend		
GSHP - SEER 14+ ER Elec Resist Furnace Erbegin	Geothermal Heat Pump SFFR 14+	1200
GSHP - SEER 14+ ER Elec Resist Furnace ERend		
GSHP - SEER 14+ Replace Elec Resist Furnace		
HVAC Maintenance and Tune-up_SF		
Indoor Coil Cleaning	Tuno Un	75
Outdoor Coil Cleaning	Tune Up	/5
RCA 10% improvement_SF		
Programmable Thermostat rebate was discontinue	d 5/5/14	

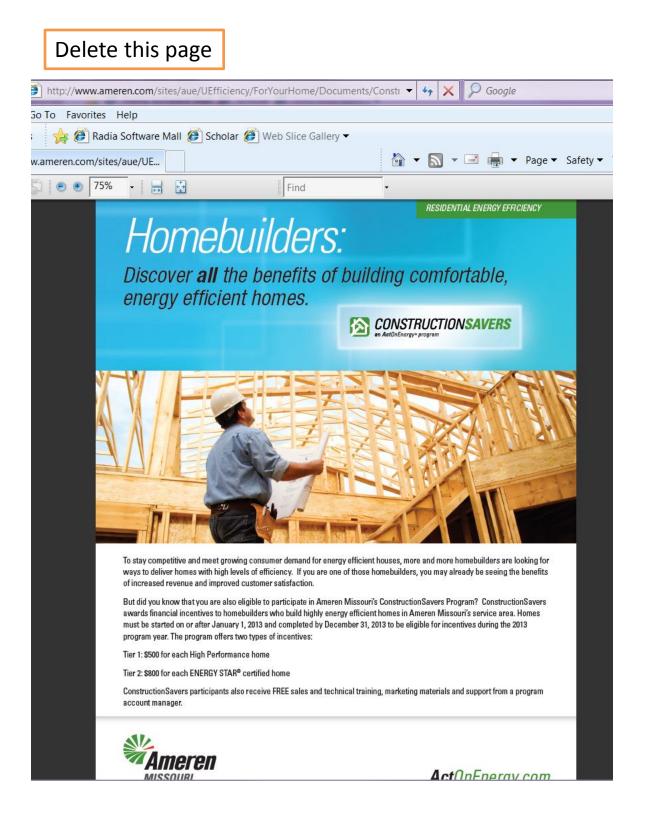
### **Residential Energy Efficiency Program Measures and Incentives**

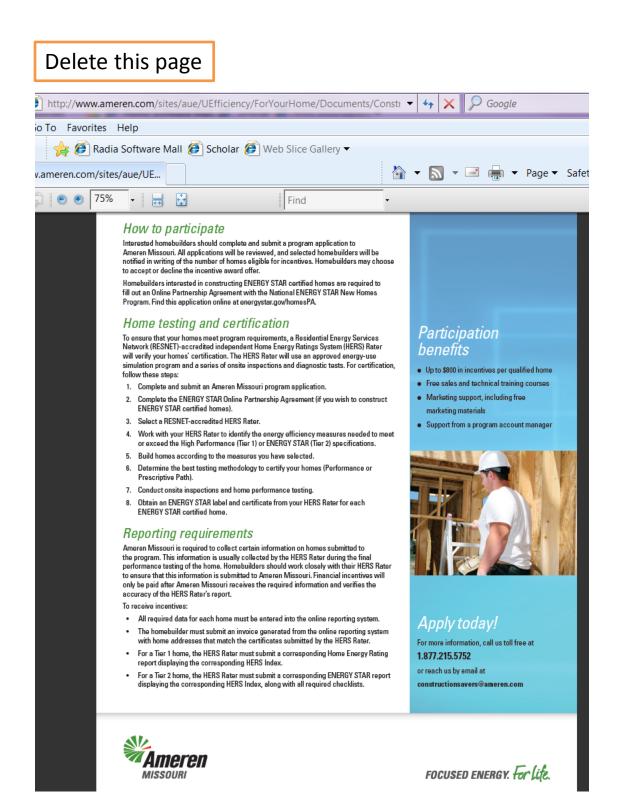
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Illinois Actor Energy       In-Home Energy Analysis: Program       Image: Contractor         Image: Note Construction: Rebates   Builders       Image: Contractor         Image: Note Construction: Rebates   Builders       Image: Contractor         Image: Lighting Discounts: Retailer   Online Store       Image: Retro-Commissioning: Incentive   Contractor         Image: CFL Recycling: Locations       Image: Low Income Property: Program   Application         Image: Definition of the income       Image: Contractor	Energy Tips 🚪 How To's	Fridge/Freezer Recycling: <u>Schedule</u>   <u>Guidelines</u>	Lighting: Incentive   Contractor
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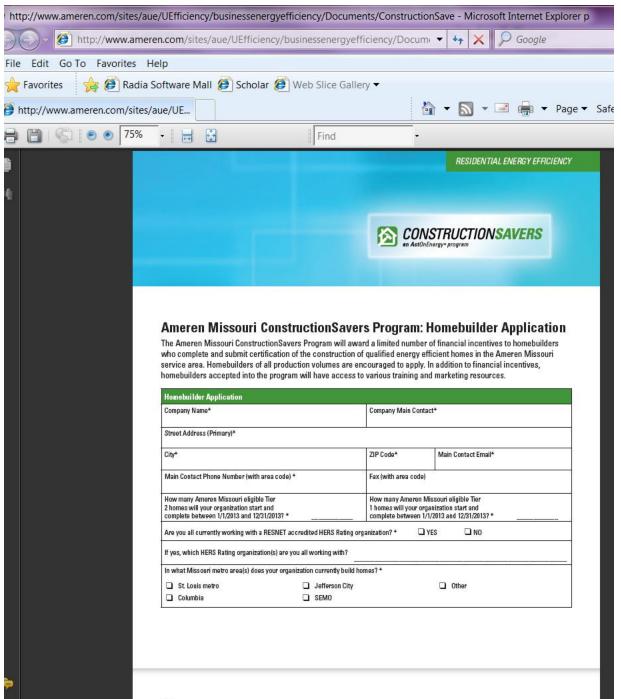






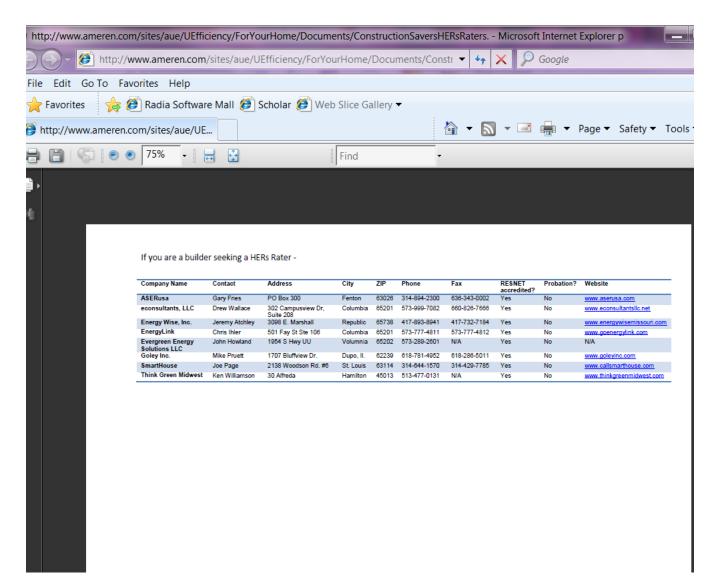


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	the number of energy efficient homes available to customers ConstructionSavers Program can help you increase your bus	
	Home Energy Rater Application	
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	Street Address (Primary)*	
	City*	ZIP Code*
	Phone (with area code) *	Fax (with area code)
	Is your organization accredited by RESNET? *	NO
	If yes, what organization is your HERS Provider?*	
	If yes, who is your OA designee? *	
	Is your organization currently operating under RESNET probation?	YES NO
	Ameren	
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	Blue Brick Renovation + Construction, LLC Bullock Building and Development,					-				
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	Blue Brick Renovation + Construction, LLC Bullock Building and Development, LLC	Brad Roell Morgan Bullock	314-772-3644 5734806446	St. Louis Metro Other SEMO St. Louis	760 S Second St., Suite 6 PO Box 373 330 Busch Lane 10449 St. Charles	St. Louis Camdenton	63102 65020	314-772-3644 573-346-7554	www.bluebrickconstruction.com	
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