BEFORE THE PUBLIC SERVICE COMMISSION OF THE STATE OF MISSOURI

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In the Matter of Union Electric Company d/b/a Ameren Missouri's 2nd Filing to Implement Regulatory Changes in Furtherance of Energy Efficiency as Allowed by MEEIA.

File No. EO-2015-0055

<u>REQUEST TO REVISE</u> 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* 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. Ameren Missouri hired The Cadmus Group ("Cadmus") and ADM Associates, Inc. ("ADM") to review certain programs, and has discussed the results of those reviews with participants in the collaborative process. As a result, Ameren Missouri offers a revised TRM for the Commission's approval. The proposed revisions implement:

- Recommendations by Cadmus and ADM reflecting changing standards;
- Changes based on the Company's 2015 EM&V results; and
- Additional measures recommended by the Implementation Team.

These updates have been reviewed by the Implementation Team and by the Company's contractors. Additionally, Ameren Missouri provided its proposed TRM revisions to MEEIA Cycle 2 stakeholders, and received no feedback. The measure changes have undergone a cost effectiveness analysis, and will not require any adjustment of the portfolio's goals. The revisions are found and explained in the following attachments:

Attachment	Name	Description
А	Revised TRM Appendix for 2017	Final, clean copy of revised TRM
В	Revised TRM Appendix for 2017 Redline	Redlined copy of revised TRM so revisions can be identified
С	EEKits TRM Review Memo	For Program Year (PY) 2016, Cadmus compared the Company's deemed per unit savings to our current estimates of measure-specific gross savings for certain measures offered in the Energy Efficiency Kits Program.
D	Efficient Products Review Memo	For PY 2016, Cadmus reviewed the potential per unit savings for energy efficiency measures rebated through the Company's Efficient Products Program.

Attachment	Name	Description
E	HVAC Review	For PY 2016, Cadmus reviewed the potential per unit savings for energy efficiency measures rebated through the Company's Heating and Cooling Program.
F	Lighting Review Memo	For PY 2016 through PY 2018, Cadmus reviewed the deemed per unit savings for measures offered through the Company's Lighting Program.
G	Lighting Support	Spreadsheet supporting revisions to the Low Income and Business program lighting measures.

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,

<u>/s/ Paula N. Johnson</u> 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 handdelivered, transmitted by e-mail, or mailed, First Class, postage prepaid, this 16th day of December, 2016, to counsel for all parties on the Commission's service list in this case.

/s/ Paula N. Johnson