

**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 Changes in Furtherance)	File No. EO-2018-0211
of Energy Efficiency as Allowed by MEEIA.)	

**APPLICATION FOR MODIFICATION OF DEMAND-SIDE MANAGEMENT PLAN,
APPROVAL OF ASSOCIATED VARIANCES, AND ADOPTION OF A PROCEDURAL
SCHEDULE**

Under authority of and in accordance with Section 393.1075, RSMo, and Commission Rules 20 CSR 4240-2.060 and 20 CSR 4240-2.094, Union Electric Company d/b/a Ameren Missouri (“Ameren Missouri” or “Company”) files this Application for Modification of Demand-Side Management Plan, Approval of Associated Variances, and Adoption of a Procedural Schedule ("Application") seeking approval of the modification of Demand-Side Management Portfolio and Plan for years 2019-21 ("MEEIA-2019-21 Plan") in order to extend the Plan's effective date through December 31, 2022 (the “MEEIA Extension”). The Company also asks for the approval of certain variances from certain Commission rules for the MEEIA Extension, as well as approval of a proposed procedural schedule and guidelines for this case. Explanatory and supporting information required by 20 CSR 4240-20.0094¹ is being filed simultaneously.²

I. INTRODUCTION

1. Ameren Missouri is seeking an extension of its existing MEEIA 2019-21 Plan.³ (with minor modification) through December 31, 2022, to avoid an undue regulatory burden created by the timing and preparation of its MEEIA Cycle 4 programming. Specifically, Ameren Missouri

¹ Because the MEEIA Extension does not require any change to Ameren Missouri's Energy Efficiency Investment Charge tariffs, 20 CSR 4240-20.093 need not be included in this *Application*.

² See the Direct Testimony filed contemporaneously with this *Application* by William R. Davis and Craig P. Aubuchon.

³ For definition, see the first bullet point on page 3, paragraph 2 of this application.

will file its triennial Integrated Resource Plan ("IRP") no later than October 1, 2020, and IRP reviews and adjudication can take approximately a year to complete. The time necessary to submit a full MEEIA plan for approval takes six to twelve months, followed by an additional six to twelve months for stakeholder review and litigation. In other words, if Ameren Missouri needed to wait until October 2021 for the triennial IRP review to conclude, it would have only three months before its MEEIA Cycle 4 plan would need to be implemented. The IRP and MEEIA filings are closely related, with resource planning figuring into the rule requirements for submission and approval of a MEEIA plan. Thus, if Ameren Missouri did attempt to take both cases on parallel paths, there is significant opportunity for each case to delay the other, given their interdependent natures. Accordingly, to mitigate these potential issues, Ameren Missouri proposes its MEEIA 2019-21 Plan be extended through December 31, 2022. The Company could then rely on refreshed IRP data without jeopardizing the timely resolution of either case.

2. The proposed MEEIA Extension would of course provide other significant benefits. For one thing, it ensures that there is no disruption for customers participating in MEEIA programming and provides contractor trade allies with additional certainty. Both of these positive impacts provide security to those active in the MEEIA marketplace, whether they are customers or trade allies. As stated by Ameren Missouri witness William R. Davis in his Direct Testimony⁴ in support of this extension:

The events of the past few months related to COVID-19 have clearly demonstrated the extreme challenges of starting and stopping economic activity for reasons not related to supply and demand. Ultimately, both customers and contractor trade allies alike benefit significantly from market certainty. This certainty is necessary to plan for and invest in projects. During these challenging times, it is also important to recognize the important role that utility-administered energy efficiency programs play in local economics. Now more than ever, customers and

⁴ Page 6, Lines 13-20.

businesses stand to benefit from a strong local commitment to market stability and business as usual....

...Commission approval of a MEEIA-program extension ... will give contractors and trade allies the stability and certainty they need to make business decisions related to staffing and marketing plans to maximize customer benefits in 2022. It will also give customers the stability and certainty needed to plan for and make potentially large capital investments, particularly on the business side where plans for energy efficiency investments may span multiple years and projects.⁵

Ameren Missouri therefore submits this *Application* in accordance with the general application requirements of 20 CSR 4240-2.060(1), as well as the more specific MEEIA program modification filing requirements of 20 CSR 4240-20.094. Accordingly, this *Application* is divided into the following sections:

- I. 20 CSR 4240-2.060(1), (A) through (M)
- II. 20 CSR 4240-20.094(4), (A) through (L)⁶
- III. Requested Variances
- III. Proposed Procedural Schedule

For ease of references, the following documents previously submitted in this case will be referred to generally in this *Application* as:

- MEEIA 2019-21 Report refers to the report and plan adopted in the *Stipulation and Agreement* filed on October 25, 2018, and approved by the Commission on December 8, 2018;
- MEEIA 2019-21 Plan refers to the MEEIA plan currently in effect (i.e., the MEEIA-2019-21 Report plus plan modifications noted in Paragraph 8 below); and

⁵ Direct Testimony of William Davis, Page 6, Lines 19-22 through Page 7, Lines 1-2.

⁶ 20 CSR 4240-20.094(5)(A)2 requires that applications for modification of MEEIA programs "shall include a complete, reasonably detailed, explanation and documentation of the proposed modifications to each of the filing requirements in section (3)." The citation to section (3) appears to be a typo, since that section addresses utility market potential studies. Section (4) appears to be the correct reference, which refers applications for approval of MEEIA plans generally. Accordingly, Ameren Missouri is demonstrating its compliance with 20 CSR 4240-20.094(5)(A)2 by addressing the filing requirements of 20 CSR 4240-20.094(4)(A) through (L), which are the filing requirements for approval of MEEIA programs.

- MEEIA 2019-24 Report and MEEIA 2019-24 Plan refer to the report and six-year plan submitted with the original *Application to Approve DSIM and Demand-Side Management Portfolio and Plan, Request for Variances and Motion to Adopt Procedural Schedule* originally filed on June 4, 2018.

The information required by the rules, as well as applicable variance and waiver requests and a proposed procedural schedule, are found in the remainder of this pleading.

I. 20 CSR 4240-2.060(1), (A) through (M)

Paragraph (A) –Applicant

3. Company is a Missouri corporation doing business under the fictitious name of Ameren Missouri, organized and existing under the laws of the State of Missouri, in good standing in all respects, with its principal office and place of business located at One Ameren Plaza, 1901 Chouteau Avenue, St. Louis, Missouri 63103. Company is a subsidiary of Ameren Corporation.

Paragraph (B) – Articles of Incorporation; Paragraph (E) – Fictitious Name; Subsection (G) – Information Previously Submitted; Paragraph (H) – Character of Business⁷

4. Ameren Missouri previously submitted to the Commission a certified copy of its Articles of Incorporation (See Case No. EA-87-105), as well as its Fictitious Name Registrations as filed with the Missouri Secretary of State’s Office (See Case No. EA-2019-0181). The Company also provided a copy of a recent certified copy of its Certificate of Good Corporate Standing in File No. EF-2020-0224. These documents are incorporated by reference and made a part of this *Application* for all purposes. Company is engaged in providing electric and gas utility services in portions of Missouri as a public utility under the jurisdiction of the Commission.

Paragraph (I) – Correspondence and Communication

5. Correspondence and Communication -- Correspondence, communications, orders

⁷ Paragraphs (C), (D), and (F) do not apply to the Company.

and decisions in regard to this Application should be directed to:

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Paragraph (K) – Actions, Judgments, and Decisions; Paragraph (L) – Fees⁸

6. Company has no final unsatisfied judgments or decisions against it from any state or federal agency or court that involve customer service or rates that have occurred within three years of the date of this *Application*. By the nature of its business, Company has, from time-to-time, pending actions in state and federal agencies and courts involving customer service or rates. Company has no annual report or assessment fees overdue to this Commission.

Paragraph (M) – Affidavit

7. An Affidavit in support of this *Application* by an authorized individual is included as Attachment 1.

II. 20 CSR 4240-20.094(4), (A) through (L)

8. Because this is an extension of the existing MEEIA 2019-21 Plan rather than a new plan, many of the existing provisions will remain unchanged, except as subsequently updated in this docket. Those updates include the following:

- On December 31, 2018, Ameren Missouri requested revisions to its Technical Resource Manual and Deemed Savings Table, which the Commission approved via an Order issued February 27, 2019;
- On November 15, 2019, Ameren Missouri requested revisions to its Technical Resource Manual and Deemed Savings Table, which the Commission approved via an Order issued December 11, 2019;

⁸ Paragraph (J) does not apply to the Company.

- On February 7, 2020, Ameren Missouri submitted a tariff change amending the definition of residential single family housing, which went into effect on March 8, 2020; and
- Program update Notices accomplished via the 11-step change process, submitted to the Commission on the following dates: February 22, 2019; July 11, 2019; August 2, 2019; October 24, 2019; November 15, 2019; December 10, 2019; February 13, 2020, and April 16, 2020.

Accordingly, many of the references citing Ameren Missouri's compliance with these filings requirements will reference existing documents.

Paragraph (A) – Stakeholder Meetings

9. Ameren Missouri has conducted numerous stakeholder meetings during the course of the existing MEEIA-2019-21 Plan and in support of the MEEIA extension. Specifically, the Company has conducted:⁹

- Quarterly collaborative stakeholder meetings as specified from paragraph 11 of the *Stipulation and Agreement*, which included special discussion of emerging issues with program year 2019 and 11-step process improvements, including a discussion of multifamily housing budgets;¹⁰
- A series of meetings of the Demand Response Collaborative, culminating in a final report and update at its November 8, 2019 meeting;
- A meeting with stakeholders on December 13, 2019, to discuss the possibility of a PAYS® pilot program; and
- A series of discussions from February through March 2020 with the Commission Staff and the Office of the Public Counsel regarding the potential extension of MEEIA through 2022.¹¹

⁹ Ameren Missouri will not revisit the stakeholder meetings held in advance of the filing of the MEEIA 2019-21 Plan itself in this *Application*.

¹⁰ These meetings were held on August 15, 2019, November 8, 2019, and February 5, 2020.

¹¹ These discussions were conducted confidentially in order to facilitate the potential negotiation of the terms of an extension. Division of Energy also participated in the first of this series of meetings.

Paragraph (B)1 – Current Market Potential Study, Paragraph (B)2 – Description of potential by customer class, Paragraph (B)3 – Discussion of 20-Year Baseline Forecasts

10. For this information, please see the MEEIA 2019-21 Report. The Company's previous market potential study was also included as part of the Company's 2017 Integrated Resource Plan ("IRP") filing in 2017, as Appendix A to Chapter 8.¹² Additionally, on March 10, 2020, Ameren Missouri shared with MEEIA stakeholders the final version of the 2020 market potential study, which will also be included with the 2020 IRP filing that will be submitted to the Commission no later than October 1, 2020. Please see Attachment 2 to this *Application* for the current 2020 DSM Market Potential Study.

Paragraphs(C)1 and 2 –TRC, RIM, and Societal Cost Tests

11. The existing programs are supported by the TRC, RIM, and Societal Cost Tests contained in Appendix A to the MEEIA 2019-21 Report submitted with the original plan filing on June 4, 2018.¹³ Ameren Missouri is updating Appendix A to include these tests for the 2022 proposed budgets and savings for all programs, including the pilot PAYS® Program. The Appendices are otherwise unchanged. Accordingly, the updated Appendix A provides the TRC, RIM, and Societal Cost Tests required by these provisions of the rule, and is included as Attachment 3 to this *Application*.

Paragraph (C)3 – Impacts on Annual Revenue Requirements

12. The impacts on annual revenue requirements and net present value of annual revenue requirements in conjunction with the IRP over the 20-year planning horizon was not

¹² File No. EO-2018-0038

¹³ While the Appendix A included with the MEEIA 2019-21 Report did not include information past 2021 for non-low income programs, the Appendix A submitted with the originally filed application performed this analysis through December 31, 2024. Accordingly, the analysis for 2022 exists in the original MEEIA-2019-24 Report as filed on June 4, 2018. Appendix C as attached to both the MEEIA 2019-21 Report and the MEEIA 2019-24 Report included avoided cost forecasting through 2037.

analyzed for the MEEIA-2019-21 Plan. Ameren Missouri applied for and was granted a waiver of 20 CSR 4240-20.094(4)(I)3, which means the Company was not required to perform this specific analysis. As noted below, Ameren Missouri will again be requesting this similar waiver through the period of the MEEIA Extension.

Paragraph (C)4 – Impacts On Supply-Side Resources

13. The impacts on Supply-Side Resources through the period of the MEEIA Extension can be found at pages 61 - 62 of the MEEIA-2019-24 Report filed in this docket on June 4, 2018. That MEEIA Report included the analysis of successive MEEIA plan filings, which highlighted the value of continued DSM implementation. By continuing to prioritize a wide mix of demand-side management measures, and through the procurement of substantial demand savings, this portfolio of investments will continue to defer supply side resources and also protect against the risk that resources would be needed sooner should conditions change.

Paragraph (D) – Description of Each Proposed Demand-Side Program

14. For the majority of programs, this information can be found in Appendix B to the MEEIA 2019-21 Report. For the new PAYS® program, please see Supplemental Appendix B, which is included with this *Application* as Attachment 4, and can be amended into the existing Appendix B to the MEEIA Report.

Paragraph (E) – Progress Towards Goal of Achieving All Cost-Effective Demand-Side Savings

15. Ameren Missouri was granted a waiver from this provision in the Commission's December 5, 2018 Order approving the *Stipulation and Agreement*. In granting the Company its requested waiver, the Commission noted that the Company made the request "[i]n order to eliminate any confusion regarding whether Ameren Missouri's MEEIA-2019-21 programs are

required to meet those 'soft' goals related to kWh and kW load reductions." Ameren Missouri will again request a waiver of this provision through the period of the MEEIA Extension.

Paragraph (F) – Identification of Co-Delivery Programs

16. The MEEIA-2019-21 Report discussed Ameren Missouri's intent to co-deliver programs when possible. The Company has indeed been co-delivering multifamily and single family low-income programs, as well as residential school kits programs. Accordingly, the existing descriptions in the MEEIA 2019-21 Report are accurate and need not be revised.

Paragraph (G) – Designation of Program Pilots

17. As noted earlier in this *Application*, Ameren Missouri intends to launch a PAYS® pilot in program year 2022. This provision of the rule requires the Company to submit "as much of the information required under subsections [(4)](C) through (E) of this rule as is practical..."¹⁴ This information is noted above in the discussion of those sections, as applicable. The rule also requires the Company to "include explicit questions that the program pilot will address, the means and methods by which the utility proposes to address the questions ... a provisional cost-effectiveness evaluation ... the proposed geographic area, and the duration for the program pilot." The cost-effectiveness of the program is addressed in the updated Appendix A to the MEEIA 2019-21 Report, as noted in response to Paragraph 11 above. As for the geographic area and the duration of the pilot, Ameren Missouri notes that it intends to make the PAYS® pilot available throughout the entirety of its territory and during the entirety of program year 2022, with the option to extend the pilot or make it permanent in its subsequent MEEIA Cycle 4 application. As for the questions the Company intends to answer and the means and methods by which those questions will be

¹⁴ The rule specifically references "Paragraph (2)(C) through (E) of this rule," which appears to be a typo since (2) does not include (C) through (E), and the rule appears to anticipate information similar to that included in a typical MEEIA application.

addressed, please see Mr. Aubuchon's Direct Testimony at pages 19-20. Finally, please see the following attachments, in addition to those referenced elsewhere in this *Application*, that are necessary to reflect the implementation of the PAYS® Pilot:

- Attachment 5, comprised of an updated Appendix M to the MEEIA 2019-21 Report, which represents updated accounting codes; and
- Attachment 6, comprised of an updated Appendix N, reflecting an updated earnings opportunity.

Paragraph (I)¹⁵ - TRC Test, as well as Including Cost-Effectiveness, Evaluation, and IRP

18. As noted in Paragraphs 11 and 17 above, the cost-effectiveness of the program, including the TRC test, is addressed in the updated Appendix A to the MEEIA 2019-21 Report. A sample evaluation, measurement, and verification plan for the pilot PAYS® program is attached to this *Application* as Attachment 7, and should be considered a Supplement to Appendix E of the MEEIA-2019-21 Report. With regard to the utility's integration process, please see Paragraph 22 below for a requested waiver, similar to similar waivers granted in the past.

Paragraph (J) – Low-Income and General Education

19. This rule generally provides that programs targeted to low-income customers or general education campaigns need to meet general filing and submission requirements for a MEEIA plan and be found in the public interest. The MEEIA 2019-21 Report demonstrates how Ameren Missouri's low-income and general education plans will continue to fulfill these requirements through the MEEIA Extension period.

¹⁵ Paragraph (H) applies to energy efficiency programs existing before the MEEIA rules were put into place, and therefore does not apply here

Paragraph K – Low-Income and General Education with TRC less than 1

20. This rule generally provides that programs targeted to low-income customers or general education campaigns need not meet the TRC cost-effectiveness test so long as they otherwise meet general filing and submission requirements for a MEEIA plan and that the costs above the level determined to be cost-effective are funded by customers participating in the demand-side programs or through tax or other governmental credits or incentives specifically designed for that purpose. The MEEIA 2019-21 Report demonstrates how Ameren Missouri's low-income and general education plans will continue to fulfill these requirements through the MEEIA Extension period.

Paragraph L - Tariffs

21. Included with this *Application* as Attachment 8 are the exemplar tariff revisions necessary to effectuate the plan modifications included with this MEEIA Extension,¹⁶ including the addition of the PAYS® pilot.

III. REQUEST FOR WAIVERS OR VARIANCES

22. In order to implement the MEEIA Extension, Ameren Missouri requests waivers or variances from certain Commission rules. In accordance with 20 CSR 4240-20.094(11), the Company seeks waivers or variances from 20 CSR 4240-20.094(4)(C)3,¹⁷ 20 CSR 4240-

¹⁶ The Company has determined that the current definitions of its MEEIA 2019-21 Plan as found in its tariffs are sufficiently broad to accommodate an amendment extending it through the program December 31, 2022:

- Sheet No. 221 – "MEEIA 2019-21 Demand-Side Management Plan - Company's '2019-21 MEEIA Energy Efficiency Plan' approved in File No. EO-2018-0211 *as may be amended.*" [Emphasis added.]
- Sheet No. 91.14 - "'MEEIA 2019-21 Plan' means Company's '2019-21 MEEIA Energy Efficiency Plan' approved in File No. EO-2018-0211 *as may be amended.*" (Emphasis added.)

Ameren Missouri is therefore not amending the name of the MEEIA 2019-21 Plan, which has helped minimize the size of this *Application*.

¹⁷ Since it is closely related to 20 CSR 4240-20.094(4)(I)3, Ameren Missouri is also requesting a waiver of 20 CSR 4240-20.094(C)3 at this time.

20.094(4)(I)3 and 20 CSR 4240-20.094(2), and in accordance with 20 CSR 4240-14.010(2) seeks a waiver or variance from 20 CSR 4240-14.030(3).¹⁸

A. Waiver/Variance Related to IRP Integration: Rule 20 CSR 240-20.094(4)(C)3 provides that the utility shall provide information regarding the impacts on annual revenue requirements as represented in a triennial IRP. Rule 20 CSR 240-20.094(4)(I)3 provides that the Commission can approve demand-side programs or program plans that it finds have met the filing and submission requirements of the MEEIA rules and “[a]re included in the electric utility’s preferred plan or have been analyzed through the integration process required by [20 CSR 4240-22.060] to determine the impact of the demand-side program and program plans on the net present value of revenue requirements of the electric utility.” The same rationale that applied to the grant of this waiver applies today, as it did when the *Stipulation and Agreement* was approved: given the current timing of the MEEIA Extension request and the 2020 IRP, good cause for this waiver exists because requiring the revision of the IRP preferred resource plan analyses to accommodate this filing does not warrant the time and effort that would be required to complete that revision.

B. Waiver/Variance Related to Annual Energy and Demand Savings Goals: Rule 20 CSR 4240-20.094(2) prescribes guidelines to review progress toward the expectation an electric utility’s demand-side programs can achieve a goal of all cost-effective demand-side savings. However, the rule expressly states that the prescribed guidelines are not mandatory and no penalty or other adverse consequence will result if a utility is unable to achieve annual savings goals specified in those guidelines. To eliminate any confusion regarding whether Ameren Missouri’s

¹⁸ Waivers of the requirements of 20 CSR 4240-20.094(4)(I)3 (formerly 4 CSR 240-20.094(3)(A)3)), 20 CSR 4240-094(2), and 20 CSR 4240-14.030(3)), on similar or even the same basis, were previously requested in the *Stipulation and Agreement* submitted in Ameren Missouri's this case on October 25, 2018, and were approved through the Commission's *Order Approving Stipulation and Agreement and Granting Waivers* issued December 5, 2018.

MEEIA Extension programs are required to meet those “soft” goals related to kWh and kW load reductions, the Company seeks a waiver of this rule.

C. Waiver/Variance Related to Promotional Practices: Rule 20 CSR 4240-14.030(3) states, in relevant part, an electric utility is prohibited from implementing any new promotional practice until after a tariff related to that practice has been filed with the Commission. The MEEIA Extension anticipates the Company will be required to change certain elements of its promotional practices – most notably incentive payments – to reflect marketplace changes. Requiring Ameren Missouri to file tariffs before such changes can be implemented would be burdensome and would prevent the Company from quickly addressing conditions the promotional practice changes were designed to address. A waiver of this rule is necessary to give Ameren Missouri administrative flexibility necessary to timely address marketplace changes so its MEEIA Extension can achieve its objective of reducing energy use and demand as cost-effectively as possible.

IV. PROPOSED PROCEDURAL SCHEDULE

23. Pursuant to 20 CSR 4240-20.094(5)(A)5 and 6, if no Party raises an objection within 30 days, the Commission shall approve, approve with modification acceptable to the Company, or reject the *Application*. If an objection is made, then the Commission shall provide an opportunity for hearing. Should a party object and the Commission establishes a hearing for this MEEIA Extension, Ameren Missouri proposes the following procedural schedule and procedural requirements for this case:

24.

EVENT	DATE
Filing Date	May 13, 2020
Rebuttal Testimony	June 30, 2020
Surrebuttal/Cross-Surrebuttal Testimony	July 15, 2020
Last Day to Request Discovery	July 21, 2020
List of Issues, List of Witnesses, and Order of Cross-Examination	July 21, 2020
Position Statements	July 22, 2020
Evidentiary Hearing	July 27-28, 2020
Initial Post-Hearing Briefs	August 10, 2020
Reply Briefs	August 20, 2020
Requested Order	September 17, 2020

WHEREFORE, Ameren Missouri requests the Commission approve the MEEIA Extension, and grant the waivers or variances requested in this application.

Respectfully submitted,

/s/ Paula N. Johnson

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List of Attachments

Attachment 1 - Affidavit in Support of Application by Authorized Individual

Attachment 2 - 2020 Market Potential Study

Attachment 3 - Updated Appendix A to the MEEIA 2019-21 Report

Attachment 4 - Supplement to Appendix B of the MEEIA 2019-21 Report

Attachment 5 - Updated Appendix M to the MEEIA 2019-21 Report

Attachment 6 - Updated Appendix N to the MEEIA 2019-21 Report

Attachment 7 - Supplement to Appendix E of the MEEIA-2019-21 Report

Attachment 8 - Exemplar Tariffs

CERTIFICATE OF SERVICE

The undersigned hereby certifies that a true and correct copy of the foregoing was served on the Staff of the Commission and the Office of the Public Counsel on this via electronic mail (e-mail) on this 13th day of May, 2020.

/s/ Paula N. Johnson _____
Paula N. Johnson