

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 has previously requested TRM revisions:

- 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 and
- On November 15, 2019, for Volume 3 (Residential), which was approved by the Commission on December 11, 2019 to be effective on January 1 2020 for the start of the 2020 program year.

4. Ameren Missouri strives to continually improve its programs, by listening to and acting on feedback from our Customers, Trade Allies, and Evaluators. Ameren Missouri has stayed in close contact with its Customers, Trade Allies, and Evaluators during the COVID-19 pandemic. Throughout the month of May, and as the State and local communities assessed the COVID-19 situation and began to lift stay at home orders, Ameren Missouri heard suggestions and recommendations for needed program changes. In response, the Ameren Missouri BizSavers team has determined that several updates to Volume 2 (Business) of the TRM are necessary to support

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.

small business and re-engage business customers at this time. Ameren Missouri has developed materials as quickly and thoroughly as possible, with input from its implementation teams and a detailed review by the current evaluation contractor. The timing of this filing is as expedited as possible, to align with the State of Missouri as it enters Phase 2 of its COVID-19 Recovery Plan.³

These necessary revisions and changes include:

- Add new measures such as more Variable Frequency drive options and large high volume/low speed fans, in order to offer more, and more relevant, products for customers in the building or agriculture operations;
- Modifying existing measure attributes for several HVAC measures, Occupancy sensors, and Kitchen Demand Ventilation Controls, to better align deemed savings values with expected operations; and
- Include clean up items to add greater clarity and specificity within select measures, such as the application of the VSD air Compressor incremental cost formula.

Ameren Missouri provided these proposed revisions to Commission Staff on June 15, 2020. 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.

³ For more detail, see: <https://governor.mo.gov/press-releases/archive/governor-parson-announces-missouri-will-fully-reopen-enter-phase-2-recovery>

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 Table⁴	
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 H – TRM Volume 2 Business	Clean copy of revised Appendix H – TRM Volume 2 – Business
Appendix H – TRM Volume 2 Business Redline	Redlined version of revised Appendix H - TRM Volume 2 – Business to illustrate location of revisions

6. Finally, Ameren Missouri requests expedited treatment of this *Request*. The Company requests approval by July 8, 2020, so that these revisions can go into effect beginning on August 1, 2020. An August 1, 2020 effective date is necessary to align program tracking data with monthly through-put discentive tracking. Expedited treatment is also requested so that Ameren Missouri can begin offering new and updated measures to customers as early as possible in the recovery plan and within the peak summer months.

⁴ While the TRM is made of up three volumes (Appendices G through I), only Appendix H required revision.

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

Respectfully submitted,

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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 19th day of June, 2020, to counsel for all parties on the Commission's service list in this case.

/s/ Paula N. Johnson
Paula N. Johnson