

MEMORANDUM

TO: Missouri Public Service Commission Official Case File,
File No. GT-2013-0383, Tracking No. YG-2013-0350, Union Electric Company d/b/a
Ameren Missouri

FROM: Henry E. Warren, Energy Unit - Tariffs/Rate Design Section

<u>/s/ Thomas M. Imhoff</u> <u>2/13/2013</u>	<u>/s/ Jeff Keevil</u> <u>2/13/2013</u>
Energy Unit, Tariff/Rate Design/Date	General Counsel's Office/Date

SUBJECT: Staff Recommendation on the tariff sheets filed to implement a Home Energy
Performance Pilot and to modify ceiling insulation requirements.

DATE: February 13, 2013

On February 1, 2013, Union Electric Company d/b/a Ameren Missouri (Ameren or Company) of St. Louis, Missouri, filed eight (8) tariff sheets with a proposed effective date of March 3, 2013 and a Motion for Expedited Treatment requesting an effective date of March 1, 2013, with the Missouri Public Service Commission (Commission). Staff believes this energy efficiency program is consistent with the provisions of the Order Approving Stipulation and Agreement in File No. GR-2010-0363 and was agreed to by the members of the Ameren Missouri Gas Energy Efficiency Advisory Group (EEAG).

The proposed tariffs sheets will add a new Pilot Program, *Home Energy Performance (HEP) Pilot* to the Company's portfolio of natural gas energy efficiency programs. The purpose of the HEP Pilot is to (1) Identify and implement *dual fuel* (natural gas and electric) energy saving measures identified in an energy audit as being cost effective and (2) perform an evaluation of the installed measures and the program. Ameren Missouri is unique among Missouri jurisdictional gas and electric utilities in that they provide both gas and electric service to some of their customers in Missouri. These dual fuel customers are located in central, east central, and southeast Missouri. The HEP Pilot program will be available to Residential Customers' homes where the Company provides both electric and natural gas service, which allows the rebates offered to customers to be partially paid by the Company's electric program as well as the gas program. This will allow participants to install audit-recommended measures that have both electric and natural gas savings, such as ceiling insulation, which might not meet the cost effective criteria (Total Resource Cost Test greater than 1.0) if evaluated on the basis of natural gas savings only.

The Company's electric HEP Pilot was one of the programs agreed upon in the Company's Missouri Energy Efficiency Investment Act ("MEEIA") filing in File No. EO-2012-0142, and approved by the Commission as a compliance tariff sheet in the Company's most recent rate case, File No. ER-2012-0166. This electric program will begin on March 1, 2013.

Additionally, this program modifies existing ceiling insulation measure qualifications in two places, as a stand-alone rebate measure and under the Residential Home Energy Audit Improvement program. The revision allows customers with current ceiling insulation levels up to R19 to receive a rebate on

additional insulation whereas, previously only customers with ceiling insulation levels of R11 or below could receive rebates for additional insulation.

Ameren Missouri has shown good cause for approval on an expedited basis since it will allow the Company's launch of the natural gas HEP program to coincide with the launch of the electric HEP program.

Staff Recommendation

The Tariffs/Rate Design Energy Unit Staff ("Staff") has reviewed the filed tariff sheets and recommends approving the following tariff sheets, as filed on February 1, 2013, to go into effect on an expedited basis for service on and after March 1, 2013, the requested expedited effective date:

P.S.C. MO. No. 2

2nd Revised Sheet No. 72,	Cancelling 1st Revised Sheet No. 72
2nd Revised Sheet No. 73,	Cancelling 1st Revised Sheet No. 73
2nd Revised Sheet No. 74,	Cancelling 1st Revised Sheet No. 74
Original Sheet No. 74.1	
Original Sheet No. 74.2	
Original Sheet No. 74.3	
9th Revised Sheet No. 81,	Cancelling 8th Revised Sheet No. 81
1st Revised Sheet No. 81.1,	Cancelling Original Sheet No. 81.1

The Staff has verified that this Company has filed its annual report and is not delinquent on any assessment. Staff is not aware of any other matter before the Commission that affects or is affected by this filing.

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

In the Matter of Union Electric Company)
d/b/a Ameren Missouri's Filing for)
Commission Approval of its Home Energy)
Performance Tariff.) Case No. GT-2013-0383

AFFIDAVIT OF HENRY WARREN

STATE OF MISSOURI)
) ss
COUNTY OF COLE)

Henry Warren, of lawful age, on oath states: that he participated in the preparation of the foregoing Staff Recommendation in memorandum form, to be presented in the above case; that the information in the Staff Recommendation was provided to him; that he has knowledge of the matters set forth in such Staff Recommendation; and that such matters are true to the best of his knowledge and belief.


Henry Warren

Subscribed and sworn to before me this 13th day of February, 2013.

LAURA BLOCH Notary Public - Notary Seal State of Missouri Commissioned for Cole County My Commission Expires: June 21, 2015 Commission Number: 11203914
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Notary Public