

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

In the Matter of Union Electric Company                    )  
d/b/a Ameren's Tariffs to Increase Its                    )       File No. GR-2019-0077  
Annual Revenues for Natural Gas Service.            )

**MOTION FOR EXPEDITED TREATMENT AND REQUEST FOR BUDGET  
INCREASE FOR NATURAL GAS ENERGY EFFICIENCY PROGRAMS**

**COMES NOW** Union Electric Company d/b/a Ameren Missouri ("Ameren Missouri" or "the Company"), and pursuant to the Missouri Public Service Commission's ("Commission") *Order Approving Stipulations and Agreements, and Compliance Tariffs* issued August 21, 2019 ("August 2019 Order") and 20 CSR 4240-2.080(14) and submits this *Motion for Expedited Treatment and Request for Budget Increase for Natural Gas Energy Efficiency Programs* ("Motion and Request"), which would allow the Company to temporarily increase its natural gas energy efficiency ("EE") budget through remainder of the current program year. In support of its position, Ameren Missouri states as follows:

**INTRODUCTION**

1. On July 22, 2019, Ameren Missouri entered into a *First Amended Nonunanimous Stipulation and Agreement* ("*Stipulation*") in File No. GR-2019-0077, which allocated funding for its natural gas EE programs for residential and general service customers. This *Stipulation*, which was approved by the Commission's August 2019 *Order*, included \$700,000 in annual funding for EE programs. In the *Stipulation*, the Company agreed to "spend the full \$700,000 annually." The Signatories to the *Stipulation* also agreed that the "Company may exceed funding levels by up to 20%, but may not exceed the 20% buffer without Commission approval."<sup>1</sup>

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<sup>1</sup> *Stipulation* paragraph 12, page 3.

2. The Company's current natural gas EE program period runs from September 2020 to August 2021. As part of its ongoing monitoring of its funds available EE program funding, Ameren Missouri discovered that at the current pace of spending, EE funding – including the 20% buffer - would be exhausted by the end of April 2021.<sup>2</sup>

3. In support of its position and in compliance with the Commission's August 2019 *Order* and 20 CSR 4240-2.080(14), Ameren Missouri provides the required information in the following sections of this *Motion and Request*:

I. August 2019 *Order*

II. Motion for Expedited Treatment

### **I. August 2019 Order**

4. As previously noted, the *Stipulation* in this case allows Ameren Missouri to exceed the 20% buffer with Commission approval. This means the Company could spend up to \$840,000, or \$140,000 over the base budget, in EE funding without requiring any additional action or approval. However, in order to continue natural gas EE programs through the end of the program year, the Company currently estimates that it would require a total of approximately \$965,000 in funding, which is approximately \$125,000 over the budget plus buffer (or 38% more than the base budget and 18% above the allowed buffer). This amount is also still subject to change as EE programs continue; as the Company's HVAC program sees increased potential in the spring and summer months, this funding requirement is likely to increase. Ameren therefore requests the buffer be increased an additional \$150,000 (or an additional 21.4% for a total buffer of 41.4%) through the end of the current program year, or through August 2021. Thereafter, Ameren

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<sup>2</sup> The Income-Eligible Weatherization Assistance Program is fully funded and its budget is unaffected by this *Motion and Request*.

Missouri will revert back to the 20% buffer for the next program year, and can only exceed that buffer by again requesting Commission approval.

5. Granting this budget increase on a temporary basis for the existing program year will prevent the programs from shutting down until the next program year. Because program ramp-up takes time, temporarily discontinuing the program because of a lack of funding will have a detrimental impact on the natural gas EE programs. The Company has discussed the need to exceed the 20% buffer and its current projected overages with the Commission's Staff ("Staff"), the Office of the Public Counsel ("OPC"), and the Missouri Department of Economic Development – Division of Energy ("DE"), who all indicated they would not object to a temporary budget increase.

## **II. Motion for Expedited Treatment**

6. 20 CSR 4240-2.080(14) provides that a request for expedited treatment shall set forth the date by which it requires a Commission decision, the harm that will be avoided or benefit that will accrue, and an explanation of the timing of the pleading. Ameren Missouri requests a decision in this matter by April 20, 2021, to allow it sufficient time to allocate additional funds to the programs. Allowing this temporary budget increase will allow the natural gas EE programs to continue without interruption; because interruptions in program implementation create restart delays in the next program year, natural gas EE benefits will otherwise be lost. There will be no negative effect on the Company's customers or the general public by acting on this *Motion and Request* in an expedited manner. Finally, given when budget estimates revealed the exhaustion of funds, internal vetting of budgets and remediation possibilities, and the time taken to discuss the issue with certain stakeholders, this pleading was submitted for Commission approval as soon as it could have been.

**WHEREFORE**, Ameren Missouri respectfully requests that the Commission grant the requested, temporary adjustment of the 20% (\$140,000) buffer for its natural gas EE budget to a 41.4% (\$290,000) buffer through August 2021, and that the Commission grant these requested on an expedited basis so that the natural gas EE programs may continue through the end of the program year without interruption.

Respectfully submitted,

/s/ Paula N. Johnson

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**CERTIFICATE OF SERVICE**

The undersigned hereby certifies that a true and correct copy of the foregoing was served on the parties to this matter via electronic mail (e-mail) on this 22<sup>nd</sup> day of March, 2021.

*/s/ Paula N. Johnson* \_\_\_\_\_  
Paula N. Johnson