

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

In the Matter of Union Electric Company                    )  
d/b/a Ameren Missouri's 3<sup>rd</sup> Filing to                    )  
Implement Regulatory Changes in                    )        File No. EO-2018-0211  
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**

Under authority of and in accordance with Section 393.1075, RSMo, and Commission Rules 20 CSR 4240-2.060 and 20 CSR 4240-20.094, Union Electric Company d/b/a Ameren Missouri (“Ameren Missouri” or “Company”) files this Application for Modification of Demand-Side Management Plan, and Approval of Associated Variances ("*Application*") seeking approval of the modification of the Company's 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, 2023 (the “MEEIA Extension” or "*PY 23 Extension*"). The Company also asks for the approval of certain variances from certain Commission rules for the MEEIA Extension. Explanatory and supporting information required by 20 CSR 4240-20.0094<sup>1</sup> is being filed simultaneously.<sup>2</sup>

**I. INTRODUCTION**

1. On July 10, 2020, several parties to this proceeding submitted a *Unanimous Stipulation and Agreement Regarding the Implementation of Certain MEEIA Programs through Plan Year 2022 ("PY 2022 Stipulation")*, which extended the existing MEEIA 2019-21, with modifications, through plan year ("*PY*") 2022, with the addition of a new Pay as You Save ® ("*PAYS*®") program

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<sup>1</sup> 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*.

<sup>2</sup> See also the Direct Testimony filed contemporaneously with this *Application* by Craig P. Aubuchon and Timothy E. Via.

starting in PY 2021 through PY 2022. The Commission approved the *PY 2022 Stipulation* on August 5, 2020. Ameren Missouri is seeking an additional extension of its existing MEEIA 2019-21 Plan<sup>3</sup> (with minor modifications) through December 31, 2023, to avoid an undue regulatory burden created by the timing and preparation of its MEEIA Cycle 4 programming. As explained in more detail in the Direct Testimony of Craig P. Aubuchon filed simultaneously with this *Application*, an extension will alleviate the pressures caused by inter-dependencies of Ameren Missouri's open Integrated Resource Plan ("IRP") case<sup>4</sup> and demand-side resources. The time necessary to submit a full MEEIA plan for approval takes up to twelve months, followed by an additional period of up to twelve months for stakeholder review and litigation. With Ameren Missouri's IRP case still unresolved, the time necessary for the development of a full-cycle MEEIA plan is compressed.

2. In support of this *Application*, Ameren Missouri includes the testimony of two witnesses:

- Craig P. Aubuchon, Senior Manager of Energy Efficiency Operations, provides testimony in support of the PY 23 Extension.
- Timothy E. Via, Manager of Energy Efficiency, provides testimony specifically regarding program options for income eligible customers.

3. The proposed MEEIA PY 23 Extension would provide other substantive benefits. For example, an extension ensures that there is no disruption for customers participating in MEEIA programs 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. Ameren Missouri therefore submits this *Application* in accordance with the general

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<sup>3</sup> For definition, see the second bullet of paragraph 3 of this *Application*.

<sup>4</sup> File No. EO-2021-0021.

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)<sup>5</sup>
- III. Requested Variances

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 9 below); and
- 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, are found in the remainder of this pleading. The Company anticipates reaching out to the parties shortly in an effort to either develop a mutually acceptable settlement of this matter or to develop a procedural schedule that will take this matter to a quick and efficient resolution.

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<sup>5</sup> 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.

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

### Paragraph (A) – Applicant

4. 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 Business<sup>6</sup>

5. 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. EO-2021-0401. 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

6. Correspondence and Communication -- Correspondence, communications, orders and decisions in regard to this Application should be directed to:

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<sup>6</sup> Paragraphs (C), (D), and (F) do not apply to the Company.

**Paragraph (K) – Actions, Judgments, and Decisions; Paragraph (L) – Fees<sup>7</sup>**

7. 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**

8. 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)**

9. 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:

- Technical Resource Manual:
  - 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;
  - On June 19, 2020, Ameren Missouri requested revisions to its Technical Resource Manual and Deemed Savings Table, which the Commission approved via an Order issued July 8, 2020; and

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<sup>7</sup> Paragraph (J) does not apply to the Company.

- On October 16, 2020, Ameren Missouri requested revisions to its Technical Resource Manual and Deemed Savings Table, which the Commission approved via an Order issued November 12, 2020;
- Tariffs:
  - 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
  - On November 18, 2020, Ameren Missouri requested a tariff revision to facilitate the implementation of the PAYS® program, which the Commission approved on December 1, 2020;
- 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, April 16, 2020; June 1, 2020; June 12, 2020; June 22, 2020; July 28, 2020; September 22, 2020; and April 30, 2021; and
- Settlements:
  - On June 10, 2020, several signatories submitted a Stipulation and Agreement amending the savings calculations for income eligible programs, which was approved by the Commission on June 24, 2020; and
  - On July 10, 2020, signatories submitted a unanimous Stipulation and Agreement regarding the extension of MEEIA programs through PY22, which the Commission approved on August 5, 2020.

Accordingly, many of the references citing Ameren Missouri's compliance with these filings requirements will reference existing documents.<sup>8</sup>

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<sup>8</sup> This list may not be exhaustive as additional activity may take place in the docket before the resolution of this extension request. Any additional revisions to the plan that occur between now and the resolution of this *Application* will continue through the requested extension.

## Paragraph (A) – Stakeholder Meetings

10. Ameren Missouri has conducted numerous stakeholder meetings during the course of the existing MEEIA-2019-21 Plan and in support of MEEIA extensions. Specifically, the Company has conducted the following, in support of both the PY 22 and PY 23 extensions:<sup>9</sup>

- 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;<sup>10</sup>
- 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;
- A series of discussions from February through March 2020 with the Commission's Staff ("Staff") and the Office of the Public Counsel ("OPC") regarding the potential extension of MEEIA through 2022;<sup>11</sup>
- Meetings related to defining a dynamically optimized portfolio extension as part of the market potential study in May and June of 2020;
- Collaborative EM&V workshops in August and September 2020;
- Several collaborative meetings with stakeholders in the Company's 2020 IRP; and
- A series of discussions from beginning in February 2021 with the Staff and the OPC regarding the potential extension of MEEIA through 2023.<sup>12</sup>
- Conversations with Renew Missouri and National Housing Trust in March and April 2021.<sup>13</sup>

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

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

<sup>11</sup> 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.

<sup>12</sup> 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.

<sup>13</sup> 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**

11. The Company's most recent market potential study was also included as part of the Company's 2020 IRP filing as Appendix B to Chapter 8.<sup>14</sup> 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**

12. 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, as updated through the PY 23 extension.<sup>15</sup> The updated Appendix A is attached hereto as Attachment 3 is hereby incorporated by reference.

**Paragraph (C)3 – Impacts on Annual Revenue Requirements**

13. 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 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 PY 23 Extension.

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

14. 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.

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<sup>14</sup> File No. EO-2021-0021.

<sup>15</sup> 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.



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**

15. This information can be found in Appendix B to the MEEIA 2019-21 Report together with the Supplemental Appendix B included in the PY 22 extension for the PAYS® Program.

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

16. 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." This waiver was also granted for the PY22 extension. Ameren Missouri will again request a waiver of this provision through the period of the MEEIA Extension.

**Paragraph (F) – Identification of Co-Delivery Programs**

17. 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**

18. Ameren Missouri is not proposing any new program pilots for its PY 23 extension.

**Paragraph (I)<sup>16</sup> - TRC Test, as well as Including Cost-Effectiveness, Evaluation, and IRP**

19. As noted in Paragraph 12 above, the cost-effectiveness of the program, including the TRC test, is addressed in the updated Appendix A to the MEEIA 2019-21 Report. Appendix E to the MEEIA 2019-21 Report, as supplemented by Attachment 7 to the PY 22 extension with evaluation plans for the PAYS® program, presents a complete sample evaluation, measurement, and verification plan. With regard to the utility's integration process, please see Paragraph 24 below for a requested waiver, similar to similar waivers granted in the past.

**Paragraph (J) – Low Income and General Education**

20. 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.

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

21. 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

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<sup>16</sup> Paragraph (H) applies to energy efficiency programs existing before the MEEIA rules were put into place, and therefore does not apply here

income and general education plans will continue to fulfill these requirements through the MEEIA Extension period.

**Paragraph L - Tariffs**

22. Ameren Missouri's requested PY 23 Extension will require minimal updates, primarily with regard to the effective dates for programs included in the existing tariffs. The Company is also proposing minor revisions to the PAYS® tariff with regard to the calculation of energy savings. An exemplar tariff reflecting these changes is included as Attachment 4 to this Application, and is incorporated by reference. Ameren Missouri will file a final PAYS® tariff, as well as update the other tariffs to reflect the extended effective period, in a compliance filing when appropriate.

**Summary of Filing Requirements**

23. In light of the foregoing, the following documents are either provided with this filing or are incorporated by reference from prior filings in this docket in order to represent Ameren Missouri's MEEIA Plan for the PY 23 Extension, as follows:

<b>Document</b>	<b>Version (Filing Date)</b>
Revised Ameren Missouri's MEEIA 2019-21 Report	October 25, 2018 (Cycle 3 Settlement)
Appendix A – Portfolio and Program Summary	July 2, 2021 (PY 23 Extension Application)
Appendix B – Program Templates	October 25, 2018 (Cycle 3 Settlement)
Appendix C – Avoided Costs	October 25, 2018 (Cycle 3 Settlement)
Appendix D – Incentive Ranges	October 25, 2018 (Cycle 3 Settlement)
Appendix E – Sample Evaluation Plans and Supplement to Appendix E	October 25, 2018 (Cycle 3 Settlement) and May 13, 2020 (PY 22 Extension Application)

<b>Document</b>	<b>Version (Filing Date)</b>
Appendix F – Deemed Savings Table	October 15, 2020 (TRM Update)
Appendix G – TRM Volume 1 Overview and User Guide	October 25, 2018 (Cycle 3 Settlement)
Appendix H – TRM Volume 2 Business Measures	October 15, 2020 (TRM Update)
Appendix I – TRM Volume 3 Residential Measures	October 15, 2020 (TRM Update)
Appendix J – Exemplar Tariffs	July 2, 2021 (PY 23 Extension Application, Attachment 4)
Appendix K – Customer DSIM Explanation	May 13, 2020 (PY 22 Extension Application)
Appendix L – Customer Bill Examples	May 13, 2020 (PY 22 Extension Application)
Appendix M – Accounting	May 13, 2020 (PY 22 Extension Application)
Appendix N – Earnings Opportunity Calendar	July 2, 2021 (Included as Attachment 5 to this PY 23 Extension Application and incorporated by reference)

### **III. REQUEST FOR WAIVERS OR VARIANCES**

24. 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,<sup>17</sup> 20 CSR 4240-20.094(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).<sup>18</sup>

<sup>17</sup> 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.

<sup>18</sup> 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.

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 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.

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 - Portfolio and Program Summary

Attachment 4 – Exemplar Tariff

Attachment 5 – Updated Appendix N - Earnings Opportunity

**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 2<sup>nd</sup> day of July, 2021.

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