

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

In the Matter of Union Electric Company)	
d/b/a Ameren Missouri's 3rd Filing to)	
Implement Regulatory Changes in)	<u>Case No. EO-2018-0211</u>
Furtherance of Energy Efficiency as)	Tariff No. YE-2019-0133
Allowed by MEEIA)	

STAFF RECOMMENDATION ON COMPLIANCE TARIFFS

COMES NOW the Staff ("Staff") of the Missouri Public Service Commission and for its Recommendation regarding the compliance tariffs filed herein by Union Electric Company d/b/a Ameren Missouri ("Ameren Missouri" or "Company") on December 21, 2018, states as follows:

1. On December 5, 2018, the Commission issued an *Order Approving Stipulation and Agreement and Granting Waivers* in this case. Thereafter, on December 21, 2018, Ameren Missouri filed tariff sheets purported to be in compliance with the Commission's order, which were assigned Tariff Tracking No. YE-2019-0133, with an effective date of January 20, 2019.

2. On January 3, 2019, the Commission issued an *Order Directing Filing and Setting Response Time* in which it ordered Staff to file a Recommendation regarding the compliance tariff sheets, Tariff Tracking No. YE-2019-0133, no later than January 7, 2019. Staff's Recommendation, in memorandum form, is attached hereto and incorporated herein by reference.

3. On January 4, 2019, Ameren Missouri filed one substitute tariff sheet in Tariff Tracking No. YE-2019-0133 to correct an error in the original filing brought to its attention by Staff.

4. As reflected in the attached Recommendation memorandum, Staff has reviewed the tariff sheets filed by Ameren Missouri in Tariff Tracking No. YE-2019-0133 and determined that these sheets, as substituted, are identical to the exemplar tariff sheets that were filed as an appendix to the Stipulation and Agreement approved by the Commission in its *Order Approving Stipulation and Agreement and Granting Waivers* issued on December 5, 2018, with one exception as described in Staff's Recommendation. As stated in the Recommendation, in Staff's view that one addition is consistent with the Company's 2019-21 MEEIA Energy Efficiency Plan.

WHEREFORE, as set forth in Staff's Recommendation memorandum, Staff recommends the Commission issue an order approving the following tariff sheets as filed by Union Electric Company d/b/a Ameren Missouri on December 21, 2018, and as substituted on January 4, 2019, to go into effect for service on the requested effective date of January 20, 2019:

P.S.C. MO. No. 6

- Original Sheet Nos. 91.12-91.22
- 2nd Revised Sheet No. 174 cancelling 1st Revised Sheet No. 174
- Original Sheet No. 174.1
- Original Sheet Nos. 218-221
- Original Sheet Nos. 221.1-221.5
- Original Sheet No. 222
- Original Sheet No. 222.1
- Original Sheet No. 223
- Original Sheet No. 223.1
- Original Sheet No. 224
- Original Sheet No. 224.1
- Original Sheet No. 225
- Original Sheet No. 225.1
- Original Sheet Nos. 226-242
- Original Sheet No. 242.1
- Original Sheet Nos. 243-247
- Original Sheet No. 247.1
- Original Sheet No. 247.2
- Original Sheet No. 247.3

Original Sheet No. 248
Original Sheet No. 248.1
Original Sheet No. 249
Original Sheet No. 249.1

Respectfully submitted,

/s/ Jeffrey A. Keevil

Jeffrey A. Keevil
Missouri Bar No. 33825
P. O. Box 360
Jefferson City, MO 65102
(573) 526-4887 (Telephone)
(573) 751-9285 (Fax)
Email: jeff.keevil@psc.mo.gov

Attorney for the Staff of the
Missouri Public Service Commission

CERTIFICATE OF SERVICE

I hereby certify that copies of the foregoing have been mailed, hand-delivered, or transmitted by facsimile or electronic mail to counsel of record this 7th day of January, 2019.

/s/ Jeffrey A. Keevil

MEMORANDUM

TO: Missouri Public Service Commission Official Case File
Case No. EO-2018-0211, Tariff Tracking No. YE-2019-0133
Union Electric Company d/b/a Ameren Missouri

FROM: Brad J. Fortson, Regulatory Economist III, Energy Resources Department

/s/ John Rogers 01/07/2019 /s/ Jeff Keevil 01/07/2019
Energy Resources Department / Date Staff Counsel's Office / Date

SUBJECT: Recommendation for Approval of Compliance Tariff Sheets

DATE: January 7, 2019

On December 21, 2018, Union Electric Company d/b/a Ameren Missouri (“Ameren Missouri” or “Company”) filed with the Commission its MEEIA Cycle 3 compliance tariff sheets in response to the Commission’s *Order Approving Stipulation and Agreement and Granting Waivers* issued on December 5, 2018. The filed compliance tariff sheets have an effective date of January 20, 2019, and have been assigned Tariff Tracking No. YE-2019-0133. On January 3, 2019, the Commission ordered Staff to file a recommendation regarding the compliance tariff sheets no later than January 7, 2019.

Staff has reviewed the tariff sheets in Tariff Tracking No. YE-2019-0133 and determined that these sheets are identical to the exemplar tariff sheets that were filed as Appendix J of the Stipulation and Agreement approved by the Commission through its *Report and Order* filed on December 5, 2018 with one exception described below.

On Original Sheet No. 242, Ameren Missouri has added the Words “(excluding Low-Income Efficiency Housing grants)” to the final sentence of the Program Description section so the final sentence of the compliance tariff sheet now reads as follows:

Measures installed pursuant to the Program (excluding Low-Income Efficiency Housing grants) are not eligible for Incentives through any of the Company’s other energy efficiency or demand response programs.

In Staff’s view this addition is consistent with the detailed description in the Company’s 2019 -21 MEEIA Energy Efficiency Plan.

Also, on the Original Sheet No. 91.19 submitted on December 21, 2018, the words “and by End Use Category where applicable” were deleted. After further discussion with Ameren Missouri, a substitute Original Sheet No. 91.19 was submitted on January 4, 2019 with the missing words replaced, restoring this tariff sheet to the version agreed upon in the Stipulation and Agreement.

STAFF RECOMMENDATION

Staff has reviewed the filed compliance tariff sheets and recommends the Commission approve the following tariff sheets as filed on December 21, 2018 and substituted on January 4, 2019, to go into effect for service on the requested effective date of January 20, 2019.

P.S.C. MO. No. 6

- Original Sheets No. 91.12-91.22
- 2nd Revised Sheet No. 174 cancelling 1st Revised Sheet No. 174
- Original Sheet No. 174.1
- Original Sheet Nos. 218-221
- Original Sheet Nos. 221.1-221.5
- Original Sheet No. 222
- Original Sheet No. 222.1
- Original Sheet No. 223
- Original Sheet No. 223.1
- Original Sheet No. 224
- Original Sheet No. 224.1
- Original Sheet No. 225
- Original Sheet No. 225.1
- Original Sheet Nos. 226-242
- Original Sheet No. 242.1
- Original Sheet Nos. 243-247
- Original Sheet No. 247.1
- Original Sheet No. 247.2
- Original Sheet No. 247.3
- Original Sheet No. 248
- Original Sheet No. 248.1
- Original Sheet No. 249
- Original Sheet No. 249.1

Staff has verified that the Company is current on its annual report filings 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.

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Allowed by MEEIA)

File No. EO-2018-0211

AFFIDAVIT OF BRAD J. FORTSON

State of Missouri)
) ss.
County of Cole)

COMES NOW Brad J. Fortson and on his oath declares that he is of sound mind and lawful age; that he contributed to the attached Recommendation; and that the same is true and correct according to his best knowledge and belief.


Further the Affiant sayeth not.



Brad J. Fortson

JURAT

Subscribed and sworn before me, a duly constituted and authorized Notary Public, in and for the County of Cole, State of Missouri, at my office in Jefferson City, on this 7th day of January, 2019.



NOTARY PUBLIC

DIANNA L. VAUGHT
Notary Public - Notary Seal
State of Missouri
Commissioned for Cole County
My Commission Expires: June 28, 2019
Commission Number: 15207377