

application and is of the opinion that these modifications are reasonable and should be approved by the Commission.

WHEREFORE, the Staff respectfully requests the Commission accept its recommendation and approve the modifications.

Respectfully submitted,

/s/ Nicole Mers

Nicole Mers

Deputy Staff Counsel

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**Attorney for the Staff of the
Missouri Public Service Commission**

CERTIFICATE OF SERVICE

I do hereby certify that a true and correct copy of the foregoing document has been electronically mailed this 6th day of December, 2019 to all counsel of record in this proceeding.

/s/ Nicole Mers

MEMORANDUM

TO: Missouri Public Service Commission Official Case File
File No. EO-2018-0211
Union Electric Company d/b/a Ameren Missouri

FROM: Mark Kiesling, Utility Management Analyst III
Energy Resources Department

DATE: /s/ Brad Fortson 12/5/2019 /s/ Nicole Mers 12/5/2019
Energy Resources Department / Date Staff Counsel Department / Date

SUBJECT: Staff Recommendation For Approval Of Revision to Union Electric Company d/b/a
Ameren Missouri’s Technical Resource Manual and Deemed Savings Table

DATE: December 5, 2019

INTRODUCTION AND BACKGROUND

On November 15, 2019, Union Electric Company d/b/a Ameren Missouri (“Ameren Missouri”) filed a *Request to Revise Technical Resource Manual and Deemed Savings Table and Motion for Expedited Treatment* (“Request”). On November 26, 2019, the Commission ordered Staff to file either a recommendation or a status report stating when it expects to file a recommendation regarding the Request no later than December 6, 2019.

On October 25, 2018, the parties to File No. EO-2018-0211 filed a *Stipulation and Agreement* (“Cycle 3 Stipulation”) resolving all issues in that case. On December 5, 2018, the Commission filed an *Order Approving Stipulation and Agreement and Granting Waivers*. The Cycle 3 Stipulation states on page 41 that, “The TRM and Deemed Savings Table are living documents that will be updated periodically throughout MEEIA 2019-21. Changes to the TRM will be submitted for Commission approval and will likely be a result of evaluations and/or the need to add additional measures.” On November 15, 2019, Ameren Missouri filed updates to Appendix F (Deemed Savings Table) and Appendix I (TRM-Vol 3-Residential Measures) of the Cycle 3 Stipulation.

The proposed technical resource manual (“TRM”) revisions in the Request are primarily based on: 1) incorporating the Evaluation, Measurement, and Verification (“EM&V”) results for Ameren Missouri’s MEEIA Cycle 2 program year 2018; 2) updating calculations with incremental cost input updates for central air conditioners and air source heat pumps, and 3) adding new multifamily low income measure options.

STAFF RECOMMENDATION

Staff has reviewed the revisions to the TRM and Deemed Savings Table filed by Ameren Missouri and recommends the Commission approve Ameren Missouri's Request as filed on November 15, 2019.

Staff has verified that Ameren Missouri 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.

