

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

In the Matter of Union Electric Company d/b/a)	
Ameren Missouri's 2nd Filing to Implement)	<u>Case No. EO-2015-0055</u>
Regulatory Changes in Furtherance of Energy)	Tariff No. YO-2017-0202
Efficiency as Allowed by MEEIA.)	

**STAFF RECOMMENDATION FOR COMMISSION
APPROVAL OF REVISED TARIFF SHEETS**

COMES NOW the Staff of the Missouri Public Service Commission, by and through counsel, and for its *Staff Recommendation For Commission Approval Of Revised Tariff Sheets* states as follows:

1 On April 18, 2017, Ameren Missouri filed four revised tariff sheets regarding Ameren Missouri's MEEIA Cycle 2 program in Tariff File No. YO-2017-0202.

2. On April 18, 2017, the Commission issued its *Order Directing Filing* ordering the Staff to file its recommendation no later than April 28, 2017 regarding the above-referenced tariff filing and setting a deadline of April 28, 2017 for any other party to respond.

3. The purpose of Ameren Missouri's tariff filing is to update the earnings opportunity matrix which includes certain revised energy efficiency metrics and to remove improper references to 4 CSR 240-20.094(4). The Staff has reviewed the four revised sheets and recommends their approval as further explained in Staff's Memorandum attached hereto as Appendix A.

WHEREFORE, the Staff recommends the Commission approve the following revised tariff sheets as filed on April 18th to be effective on May 18, 2017:

MO P.S.C. Schedule No. 6 Sheet No. 91.2

First Revised Sheet No. 91.2 Cancelling Original Sheet No. 91.2

MO P.S.C. Schedule No. 6 Sheet No. 91.9

First Revised Sheet No. 91.9 Cancelling Original Sheet No. 91.9

MO P.S.C. Schedule No. 6 Sheet No. 201.4

First Revised Sheet No. 201.4 Cancelling Original Sheet No. 201.4

MO P.S.C. Schedule No. 6 Sheet No. 211.3

First Revised Sheet No. 211.3 Cancelling Original Sheet No. 211.3

Respectfully submitted,

/s/ Robert S. Berlin

Robert S. Berlin

Deputy Staff Counsel

Missouri Bar No. 51709

Attorney for the Staff of the

Missouri Public Service Commission

P.O. Box 360

Jefferson City, MO 65102

Phone (573) 526-7779

Facsimile (573) 751-9285

bob.berlin@psc.mo.gov

CERTIFICATE OF SERVICE

I do hereby certify that a true and correct copy of the foregoing document has been electronically mailed this 28th day of April, 2017 to all counsel of record in this proceeding.

/s/ Robert S. Berlin

MEMORANDUM

TO: Missouri Public Service Commission Official Case File
File No. EO-2015-0055, Tariff Tracking No. YE-2017-0202
Union Electric Company d/b/a Ameren Missouri

FROM: Brad J. Fortson, Regulatory Economist III
Curtis Gateley, Utility Policy Analyst II

/s/John A. Rogers 4/28/2017

Energy Resources Department / Date

/s/ Robert S. Berlin 4/28/2017

Staff Counsel Department / Date

SUBJECT: Staff Recommendation Regarding Revised Tariff Sheets.

DATE: April 28, 2017

On April 18, 2017, Union Electric Company d/b/a Ameren Missouri (“Ameren Missouri”) filed with the Commission revised tariff sheets, as requested by Commission Staff (“Staff”), to remove incorrect references to Commission Rule 4 CSR 240-20.094(4) in its proposed 1st Revised Sheet Nos. 91.2, 201.4, and 211.3 and to update the earnings opportunity matrix in its proposed 1st Revised Sheet No. 91.9. The revised tariff sheets carry an effective date of May 18, 2017. Staff recommends approval of all four proposed tariff sheets.

Staff Review and Recommendation

Ameren Missouri’s Original Sheet No. 91.2 includes:

“Programs” means MEEIA 2016-18 programs listed in tariff sheet no. 174 and added in accordance with the Commission’s rule 4 CSR 240-20.094(4).

Also, Ameren Missouri’s Original Sheet Nos. 201.4 and 211.3 include:

Company may offer the Measures contained in Company’s Technical Resource Manual (“TRM”) approved in File No. EO-2015-0055. The offering of Measures not contained within Company’s TRM must be approved by the Commission pursuant to 4 CSR 240-20.094(4).

Ameren Missouri is proposing to delete “and added in accordance with the Commission’s rule 4 CSR 240-20.094(4)” on its 1st Revised Sheet No. 91.2 and “pursuant to 4 CSR 240-20.094(4)” on its 1st Revised Sheet Nos. 201.4 and 211.3. Commission Rule 4 CSR 240-20.094(4) states:

Pursuant to the provisions of this rule, 4 CSR 240-2.060, and section 393.1075, RSMo, an electric utility shall file an application with the commission for modification of demand-side programs by filing information and documentation required by 4 CSR 240-3.164(4) when there is a variance of twenty percent (20%) or more in the approved demand-side plan three (3)-year budget and/or any program design modification which is no longer covered by the approved tariff sheets for the program.

Staff agrees with the deletions because the addition of measures that were not previously approved by the Commission do not change the program budgets and do not involve program design modifications that would require changes to the approved tariff sheets for the program. For example, the Commission's December 28, 2016, *Order Granting Request to Revise Technical Resource Manual* approved a revision to Ameren Missouri's Commission-approved TRM¹ which included the addition of measures listed within the TRM while not altering the Commission-approved program budget or program tariff sheets.

Through its proposed 1st Revised Sheet No. 91.9, Ameren Missouri is proposing to update its Rider EEIC earnings opportunity matrix consistent with the Commission's April 13, 2017, *Order Approving Non-Unanimous Stipulation and Agreement Regarding Use of R&D Funds and Modifications of Measure Incentives* which revised certain metrics of the earnings opportunity matrix included as Appendix A to the Non-Unanimous Stipulation and Agreement Regarding Use of R&D Funds and Modifications of Measure Incentives filed on March 16, 2017.

Staff has reviewed the filed revised tariff sheets, agrees with them, and recommends the Commission approve the following revised tariff sheets as filed on April 18, 2017 to be effective on May 18, 2017:

MO P.S.C. Schedule No. 6 Sheet No. 91.2

First Revised Sheet No. 91.2 Cancelling Original Sheet No. 91.2

MO P.S.C. Schedule No. 6 Sheet No. 91.9

First Revised Sheet No. 91.9 Cancelling Original Sheet No. 91.9

MO P.S.C. Schedule No. 6 Sheet No. 201.4

First Revised Sheet No. 201.4 Cancelling Original Sheet No. 201.4

¹ Ameren Missouri's Cycle 2 TRM was initially approved by the Commission in this case on February 10, 2016 as Appendix F of the Non-Unanimous Stipulation and Agreement filed on February 5, 2016.

MO P.S.C. Schedule No. 6 Sheet No. 211.3

First Revised Sheet No. 211.3 Cancelling Original Sheet No. 211.3

Staff has verified that Ameren Missouri has filed its 2016 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.

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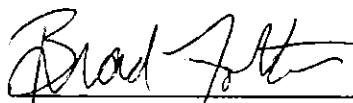
File No. EO-2015-0055

AFFIDAVIT

State of Missouri)
) ss.
County of Cole)

COMES NOW Brad 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.

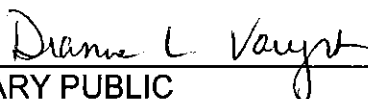
Further the Affiant sayeth not.



Brad 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 2th day of April, 2017.



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

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AFFIDAVIT

State of Missouri)
) ss.
County of Cole)

COMES NOW Curt B. Gateley 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.


Curt B. Gateley

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 27th day of April, 2017.

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


NOTARY PUBLIC