STATE OF MISSOURI
PUBLIC SERVICE COMMISSION

At a session of the Public Service Commission held by telephone and internet audio conference on the 24th day of June, 2020.

In the Matter of Union Electric Company d/b/a Ameren Missouri's 3rd Filing to Implement Regulatory Changes in Furtherance of Energy Efficiency as Allowed by MEEIA	)))))	**File No. EO-2018-0211**

ORDER APPROVING STIPULATION AND AGREEMENT

Issue Date: June 24, 2020 Effective Date: July 24, 2020

On June 10, 2020, Union Electric Company d/b/a Ameren Missouri (Ameren Missouri), Staff of the Missouri Public Service Commission (Staff), the Office of the Public Counsel (OPC), Missouri Division of Energy (DE), Consumers Council of Missouri, Renew Missouri Advocates d/b/a Renew Missouri, Natural Resources Defense Council (NRDC), National Housing Trust, and Tower Grove Neighborhood Community Development Corporation (collectively referred to as "Signatories") filed a Stipulation and Agreement Amending Savings Calculations for Income Eligible Programs.

This case began on June 4, 2018, when Ameren Missouri filed its *Application to Approve DSIM and Demand-Side Management Portfolio and Plan, Request for Variances, and Motion to Adopt Procedural Schedule*, together with a report, including associated appendices, entitled, *Ameren Missouri's 2019-24 Energy Efficiency Plan.* The filing was made under the Missouri Energy Efficiency Investment Act (MEEIA) and the Commission's MEEIA rules, and requested approval of Ameren Missouri's proposed MEEIA Cycle 3 plan. A settlement agreement with regard to the application was approved by the Commission on December 5, 2018. That agreement included a *Revised Ameren Missouri's 2019-21 Energy Efficiency Plan* (referred to as “the Report”). The Report outlines many aspects of Ameren Missouri's energy efficiency portfolio, including how energy savings are calculated for use in performance metrics. Of specific relevance for the agreement at issue are the savings calculation provisions applicable to the Residential Multi-Family Low Income (MFLI) Program and the Residential Single-family Low Income (SFLI) Program.

The Signatories related that because of the COVID-19 pandemic, many aspects of the MFLI and SFLI programs have been difficult, if not impossible, to accomplish because of measures taken for public safety such as social distancing. The Signatories have agreed to a safer strategy for accomplishing the intent of the programs by targeting residential units that are unoccupied during tenant turnover or building renovations. However, to accomplish this safer strategy minor modifications or clarifications are needed to the performance measurement for situations not contemplated in the Report. Accordingly, the Signatories agreed that certain modifications as set out in the agreement and the ordered paragraphs below should be made to the Report for the purposes of calculating savings for affected program years.[1]

At this time, the Signatories believe only program year 2020 will be affected by the COVID-19 pandemic. However, the Signatories are not proposing an expiration date on the requested revisions. The Signatories explained that should COVID-19 impact

[1] The agreement sets out the language to be added to two paragraphs of the report by underlining it. For context, to show where the language should be added, the agreement contains the entirety of the paragraphs being amended. The paragraphs each contain an obvious typographical error of “12%” instead of “125%.” Counsel for Ameren Missouri in an e-mail shared with counsel for all parties, confirmed that the only amendments are the addition of the underlined language.

program years beyond 2020, the revisions will already be in place and further agreements will not be necessary. Additionally, if COVID-19 does not affect program year 2021, these provisions will not require large-scale implementation and will not significantly or inappropriately impact the savings calculations for future program years.

The Signatories reported that, although not signatories to the agreement, none of the other parties to the case were opposed to the agreement. Commission Rule 20 CSR 4240-2.115(2) provides that parties that are not signatories to a nonunanimous stipulation and agreement have seven days in which to object to that agreement. If no party files a timely objection to a nonunanimous stipulation and agreement, the Commission may treat it as a unanimous stipulation and agreement. The time for objections has passed and none were filed. Therefore, the Commission treats this agreement as though it were unanimous.

After reviewing the unopposed stipulation and agreement, the Commission finds that it is a reasonable revision to the Report and should be approved.

THE COMMISSION ORDERS THAT:

1. The Stipulation and Agreement Amending Savings Calculations for Income Eligible Programs filed on June 10, 2020, is approved. The Signatories are ordered to comply with the terms of the stipulation and agreement. A copy of the stipulation and agreement is attached to this order.

2. The specific changes are:

   a. The MFLI savings calculation paragraph at page 53 of the Report is modified to add the underlined text as follows:

      The Average Percent Energy Savings Per Property will be calculated as the total Multifamily Low-Income Program's evaluated energy savings plan for the program year divided by the total billed energy consumption for all of the properties served during that program year. The total billed energy consumption for all of the properties will be the billed consumption for each property covering 12 months prior to the month the property participated in the program, as reported in the Company's billing system. Savings for multifamily properties that are vacant or were repurposed to a multifamily property will be determined using either the Technical Analysis Study or the Whole Building Area Method described in the Business New Construction Incentive Program tariff, Sheet No. 225. A property is defined as a multi-unit dwelling sharing the same address. For each program year, the EM&V report will report the Multifamily Low-Income Program's evaluated energy savings and the 12-month total billed energy consumption for use as inputs into the Earnings Opportunity Calculator. This performance metric has an annual cap of 125% performance compared to the annual target.

b. The SFLI savings calculation paragraph at page 54 of the Report is modified to add the underlined text as follows:

The Average Percent Energy Savings Per Property will be calculated as the total Single Family Low-Income Program's evaluated energy savings (less the Low-Income Efficiency Housing Grants) for the program year divided by the total billed energy consumption for all of the properties served during that program year. The total billed energy consumption for all of the properties will be billed consumption for all of the properties will be the billed consumption for each property covering 12 months prior to the month the property participated in the program as reported in the Company's billing system. Properties that are vacant for 30 days or more prior to participation in the program will use the most recent 12 month period preceding the date of the last occupied consumption usage data billed. A property is defined as the single dwelling at an address. For each program year, the EM&V report will report the Single Family Low-Income Program's evaluated energy savings (less the Low-Income Efficiency Housing Grants) and the 12-month total billed energy consumption for use as inputs into the Earnings Opportunity Calculator. This performance metric has an annual cap of 125% performance compared to the annual target.

3. This order shall be effective on July 24, 2020.

BY THE COMMISSION

Morris L Woodruff

Morris L. Woodruff
Secretary

Silvey, Chm., Kenney, Rupp, Coleman, and
Holsman CC., concur.

Dippell, Senior Regulatory Law Judge