

**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)
Furtherance of Energy Efficiency as)
Allowed by MEEIA)
Case No. EO-2018-0211

**STAFF RECOMMENDATION ON AMEREN MISSOURI’S REQUEST TO
REVISE TECHNICAL RESOURCE MANUAL AND DEEMED SAVINGS TABLE**

COMES NOW the Staff (“Staff”) of the Missouri Public Service Commission and for its Recommendation regarding the Request to Revise Technical Resource Manual and Deemed Savings Table (“Request”) filed herein by Union Electric Company d/b/a Ameren Missouri (“Ameren Missouri” or “Company”) on December 31, 2018, states as follows:

1. On December 5, 2018, the Commission issued an *Order Approving Stipulation and Agreement and Granting Waivers* in this case. The Stipulation and Agreement approved by that Order provided, in part, that “By December 31, 2018, the Company will file for Commission approval of an updated TRM and an updated Deemed Savings Table to reflect the results of MEEIA 2016-18 Program Year 2017 evaluation results. The updates will also include fixed incremental cost calculations identified while investigating Staff’s concerns about the cost-effectiveness of certain measures.” The Order further stated that the updated TRM will include new sections regarding demand response to provide more specificity on the determination of energy and demand savings.

2. On December 31, 2018, Ameren Missouri filed its Request to Revise Technical Resource Manual and Deemed Savings Table. During Staff’s review of

Ameren Missouri's Request, it found that the energy and demand savings for the Home Energy Report ("HER") program had not been updated in the TRM and Deemed Savings Table to reflect program year 2017 EM&V results. Staff contacted Ameren Missouri about this issue and as a result, on January 11, 2019, Ameren Missouri filed Corrected Appendices ("Corrected Appendices") updating the energy and demand savings for the HER program to reflect program year 2017 EM&V results.

3. On January 9, 2019, the Commission ordered Staff to file a Recommendation regarding Ameren Missouri's request to revise its technical resource manual and deemed savings table no later than January 22, 2019. Staff's Recommendation, in memorandum form, is submitted herewith and incorporated herein by reference.

4. As reflected in the attached Recommendation memorandum, Staff has determined that Ameren Missouri's Request and Corrected Appendices satisfy the Stipulation and Agreement's requirements as related to updating the TRM and Deemed Savings Table.

WHEREFORE, as set forth in Staff's Recommendation memorandum, Staff recommends the Commission issue an order approving Ameren Missouri's Request as filed on December 31, 2018, and updated with Corrected Appendices on January 11, 2019.

Respectfully submitted,

/s/ Jeffrey A. Keevil

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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 22nd day of January, 2019.

/s/ Jeffrey A. Keevil

MEMORANDUM

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

FROM: Brad J. Fortson, Regulatory Economist III

DATE: /s/ John Rogers 1/22/2019 /s/ Jeff Keevil 1/22/2019
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: January 22, 2019

On December 31, 2018, Union Electric Company d/b/a Ameren Missouri ("Ameren Missouri") filed a *Request to Revise Technical Resource Manual and Deemed Savings Table* ("Request"). On January 9, 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 January 22, 2019.

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 2017; 2) Updating incremental cost calculations identified while investigating Staff's concerns about the cost-effectiveness of certain measures; and 3) Adding new sections regarding demand response.

The Stipulation and Agreement approved on December 5, 2018, in the Commission's *Order Approving Stipulation and Agreement and Granting Waivers* in File No. EO-2018-0211 ("Cycle 3 Stipulation"), states that, "By December 31, 2018, the Company will file for Commission approval of an updated TRM and an updated Deemed Savings Table to reflect the results of MEEIA 2016-18 Program Year 2017 evaluation results. The updates will also include fixed incremental cost calculations identified while investigating Staff's concerns about the cost-effectiveness of certain measures." It further states that the updated TRM will include new sections regarding demand response to provide more specificity on the determination of energy and demand savings.

In Staff's review of Ameren Missouri's Request, it found that the energy and demand savings for the Home Energy Report ("HER") program had not been updated in the TRM and Deemed Savings Table to reflect program year 2017 EM&V results. Staff contacted Ameren Missouri about this issue and as a result, on January 11, 2019, Ameren Missouri filed a *Corrected Appendices* ("Corrected Appendices") in File No. EO-2018-0211 updating the energy and demand savings for the HER program to reflect program year 2017 EM&V results. Ameren Missouri's Request and Corrected Appendices satisfies the Cycle 3 Stipulation requirements as it relates to updating the TRM and Deemed Savings Table.

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 December 31, 2018, and updated with Corrected Appendices on January 11, 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.

