

**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	)	<b><u>File No. EO-2018-0211</u></b>
Implement Regulatory Changes in	)	Tracking No. YE-2020-0136
Furtherance of Energy Efficiency as	)	
Allowed by MEEIA	)	

**STAFF RECOMMENDATION**

**COMES NOW** the Staff of the Missouri Public Service Commission ("Staff") and submits its *Recommendation* as follows:

1. On February 7, 2020, Union Electric Company d/b/a Ameren Missouri ("Ameren Missouri" or "Company") filed with the Missouri Public Service Commission ("Commission") a tariff sheet revision to expand the availability of its Missouri Energy Efficiency Investment Act ("MEEIA") Residential Single Family Low-Income Program ("SLFI") to include attached dwellings of four or fewer units.

2. On February 13, 2020, Ameren Missouri filed a *Notification* ("Notice") indicating certain changes to four of its MEEIA Cycle 3 energy efficiency programs.

3. The Commission ordered Staff to file a recommendation regarding Ameren Missouri's tariff filing and Notice no later than February 20, 2020.

4. Following the Commission's order, Ameren Missouri filed a *Clarification of Tariff and Notification Filings* ("Clarification") on February 19, 2020, suggesting that the tariff revision and Notice address two separate aspects of Ameren Missouri's income eligible single family MEEIA programs, and they need not be combined for the purpose of any Commission action.

5. Following the Commission's order and Company Clarification, it is Staff's recommendation that the Commission approve the tariff sheet revision as filed on

February 7, 2020. As to the Notice filed on February 13, 2020, it is Staff's recommendation that no action from the Commission is necessary.

### **TARIFF REVISION**

6. Staff has reviewed the revised SFLI tariff sheet. The revisions would include attached dwellings of four or fewer units to now be eligible to participate in the SFLI program.

7. Following Staff's review, it is Staff's recommendation that the Commission approve the tariff sheet as filed on February 7, 2020, to go into effect on the requested effective date of March 8, 2020.

### **NOTICE**

8. Ameren Missouri filed a Notice indicating modifications to the incentives offered for four (4) of its MEEIA Cycle 3 energy efficiency programs and an update to its Deemed Savings Table as a general clean-up of items that do not impact other offered measures.

9. Ameren Missouri's tariff was created to allow flexibility within a MEEIA Cycle to make certain changes to its energy efficiency programs without the need for Commission approval, usually resulting from market influence and trade-ally feedback.

10. Since the changes are allowable through Ameren Missouri's tariffed change process, no action from the Commission is necessary.

**WHEREFORE**, Staff recommends the Commission issue an order approving the First Revised Sheet No. 242 Canceling Original Sheet No. 242, as filed on February 7, 2020, for service on and after March 8, 2020, the requested effective date.

Respectfully Submitted,

**/s/ Travis J. Pringle**

Travis J. Pringle

Missouri Bar No. 71128

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Missouri Public Service Commission

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**CERTIFICATE OF SERVICE**

I hereby certify that copies of the foregoing have been mailed, hand delivered, transmitted by facsimile or electronically mailed to all counsel of record this 20th day of February, 2020.

**/s/ Travis J. Pringle**

## MEMORANDUM

TO: Missouri Public Service Commission Official Case File  
File No. EO-2018-0211, Tariff Tracking No. YE-2020-0136

FROM: Brad J. Fortson, Utility Regulatory Manager  
Energy Resources Department

DATE: /s/ Natelle Dietrich 2/20/2020                      /s/ Travis J. Pringle 2/20/2020  
Industry Analysis Director / Date                      Staff Counsel Department / Date

SUBJECT: Staff Recommendation regarding Union Electric Company d/b/a  
Ameren Missouri's tariff sheets set out in Tracking No. YE-2020-0136 and its  
Notification filed February 13, 2020

DATE: February 20, 2020

On February 7, 2020, Union Electric Company d/b/a Ameren Missouri ("Ameren Missouri") filed in File No. EO-2018-0211, Tracking No. YE-2020-0136, a tariff sheet revision to expand the availability of its MEEIA Residential Single Family Low-Income Program to include attached dwellings of four or fewer units.

On February 13, 2020, Ameren Missouri filed a *Notification* ("Notice"), in File No. EO-2018-0211, indicating certain changes to four of its MEEIA Cycle 3 energy efficiency programs.

On February 14, 2020, the Commission ordered Staff to file a recommendation regarding Ameren Missouri's Notice and tariff filing.

On February 19, 2020, Ameren Missouri filed a *Clarification of Tariff and Notification Filings* ("Clarification") suggesting that the tariff revision and the notice address two separate aspects of Ameren Missouri's income eligible single family MEEIA programs and that these separate aspects need not be combined for the purposes of any Commission action.

Also on February 19, 2020, the Commission clarified its previous order by ordering Staff to file a recommendation regarding Ameren Missouri's tariff sheets set out in Tracking No. YE-2020-0136 and its Notice. The Commission noted that the Staff recommendation may include a statement that Staff believes no Commission action is required regarding one or both of Ameren Missouri's filings.

### **Residential Single Family Low-Income Program tariff sheet revision**

Ameren Missouri filed a revision to its Residential Single Family Low-Income Program ("SFLI") tariff sheet to include attached dwellings for four (4) or fewer units. Ameren Missouri has stated that low-income families in a dwelling of 3 to 4 family units cannot take advantage of savings opportunities provided by the SFLI program. The current SFLI tariff sheet limits participation to no greater than duplex dwellings. Ameren Missouri has further stated that 3 to 4 multifamily unit

owners rarely participate in the Residential Multi-Family Low-Income Program (“MFLI”). Owners of 3 to 4 units that are not located in a selected single family pre-qualified neighborhood may still participate in the MFLI program. Processes are in place to prevent customers from obtaining incentives for the same measures from both the SFLI and MFLI programs.

The SFLI tariff sheet revision was filed with Tracking No. YE-2020-0136, in File No. EO-2018-0211, as part of Ameren Missouri’s MEEIA Cycle 3. Since this tariff sheet revision was filed in EO-2018-0211, Staff believes a Commission Order is necessary to effectuate the revision.

### **Notice**

Ameren Missouri filed a Notice indicating modifications to the incentives offered for four (4) of its MEEIA Cycle 3 energy efficiency programs and an update to its Deemed Savings Table as a general clean-up of items that do not impact other offered measures.

Ameren Missouri’s tariff<sup>1</sup> allows for “Program details regarding the interaction between the Company or Program Administrators and customers participating in the programs, Incentives paid directly to customers, available Measures, Measure ranges, availability of the programs, eligibility, and application and completions requirements may be adjusted through the change process as presented below.” The tariff provides for an 11-step change process to effectuate these changes.

In particular, step 5 of this change process requires Ameren Missouri to “Inform the Staff, Office of the Public Counsel, and the Missouri Department of Economic Development<sup>2</sup> - Division of Energy (DE) of the proposed change, the time within which it needs to be implemented, provide them the analysis that was done and consider recommendations from them that are received within the implementation timeline (the implementation timeline shall be no less than five business days from the time that the Staff, Office of the Public Counsel, and the DE are informed and provided the above-referenced analysis).”

On February 6, 2020, Ameren Missouri communicated, via email, to Staff, Office of the Public Counsel, and Division of Energy its intention to make the modifications to its energy efficiency programs through the tariffed change process. No party opposed these modifications.

The change process provided for in Ameren Missouri’s tariff was created to allow Ameren Missouri flexibility within a MEEIA Cycle to make certain changes to its energy efficiency programs without the need for Commission approval. These changes are typically a result of market influence and trade-ally feedback.

Since the changes proposed are allowable through Ameren Missouri’s tariffed change process, no action from the Commission is necessary.

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<sup>1</sup> MO.P.S.C Schedule No. 6 Original Sheet No. 221.3 – 221.4

<sup>2</sup> Currently the Missouri Department of Natural Resources

MO PSC File No. EO-2018-0211  
Official Case File Memorandum  
February 20, 2020

**STAFF RECOMMENDATION**

Staff has reviewed the revised SFLI tariff sheet and recommends the Commission approve the following tariff sheet as filed on February 7, 2020, to go into effect on the requested effective date of March 8, 2020.

MO.P.S.C. Schedule No. 6 Sheet No. 242

First Revised Sheet No. 242 Cancelling Original Sheet No. 242

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.

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d/b/a Ameren Missouri's 3<sup>rd</sup> Filing to ) Case No. EO-2018-0211  
Implement Regulatory Changes in )  
Furtherance of Energy Efficiency as Allowed )  
by MEEIA )  
)

**AFFIDAVIT OF BRAD J. FORTSON**

STATE OF MISSOURI )  
) ss.  
COUNTY OF COLE )

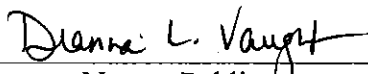
**COMES NOW BRAD FORTSON** and on his oath declares that he is of sound mind and lawful age; that he contributed to the foregoing *Staff Recommendation in Memorandum form*; and that the same is true and correct according to his best knowledge and belief.

Further the Affiant sayeth not.

  
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**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 20<sup>th</sup> day of February, 2020.

  
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Notary Public

