

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

In the Matter of the First Prudence Review)
of the Missouri Energy Efficiency)
Investment Act (MEEIA) Cycle 3 Energy) **File No. EO-2021-0157**
Efficiency Programs and Cycle 2 Long-Lead)
Projects of Union Electric Company)
d/b/a Ameren Missouri)

**STAFF REPORT OF FIRST MEEIA PRUDENCE REVIEW
OF CYCLE 3 ENERGY EFFICIENCY PROGRAMS AND
CYCLE 2 LONG-LEAD PROJECTS**

COMES NOW Staff of the Missouri Public Service Commission, by and through counsel, and presents to the Commission its report of the *First Prudence Review for Cycle 3 of Costs Related to the Demand-Side Programs Investment Mechanism and Cycle 2 Long-Lead Projects for the Electric Operations of Union Electric Company, d/b/a Ameren Missouri (Staff's Report)*, filed contemporaneously herewith, for the period March 1, 2019 through September 30, 2020. As a result of its review, Staff proposes certain disallowances or adjustments as reflected in detail in the accompanying Staff Report and in support thereof states as follows:

1. Commission Rule 20 CSR 4240-20.093(11), authorized under § 393.1075.3 and § 393.1075.11, RSMo., provides that “[a] prudence review of the costs subject to the DSIM shall be conducted no less frequently than at twenty-four (24) month intervals.”

2. On December 3, 2020, Staff initiated this MEEIA prudence review. In its *Order Directing Notice and Setting Deadline for Intervention* (“Order”) issued on March 11, 2021, the Commission directed Staff to file its recommendation no later than May 3, 2021.

3. In accordance with 20 CSR 4240-20.093(11), Staff's Report explains the results of its examination and analyses in this case. The Staff's Energy Resources Department had primary responsibility for conducting the prudence review and developing its recommendation for the proposed adjustments reflected in Staff's Report. Staff reviewed and analyzed a variety of items while examining whether Ameren Missouri prudently incurred program costs, TD and interest costs for the Review Period. Staff's Report is filed contemporaneously herewith, in both Confidential and Public formats.

4. Based on its review, Staff recommends the disallowance of certain "sponsorship" costs, as well as the carryover of an Ordered Adjustment, plus interest, from the last Ameren Missouri MEEIA prudence review which the Company failed to include in its subsequent DSIM filing, as explained in greater detail in the Staff Report.

WHEREFORE, Staff prays the Commission accept its Staff Report on the *First Prudence Review for Cycle 3 of Costs Related to the Demand-Side Programs Investment Mechanism and Cycle 2 Long-Lead Projects for the Electric Operations of Union Electric Company, d/b/a Ameren Missouri* filed contemporaneously herewith and issue an order directing Ameren Missouri to make the Ordered Adjustment(s) reflected in the Staff Report.

Respectfully submitted,

/s/ Jeffrey A. Keevil

Jeffrey A. Keevil

Missouri Bar No. 33825

Attorney for the Staff of the

Missouri Public Service Commission

P. O. Box 360

Jefferson City, MO 65102

(573) 526-4887 (Telephone)

(573) 751-9285 (Fax)

Email: jeff.keevil@psc.mo.gov

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 as reflected on the certified service list maintained by the Commission in its Electronic Filing Information System (EFIS) this 3rd day of May, 2021.

/s/ Jeffrey A. Keevil