

**MISSOURI PUBLIC SERVICE COMMISSION**

**STAFF REPORT**

**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**

**FILE NO. EO-2021-0157**

**March 1, 2019 through September 30, 2020**

*Jefferson City, Missouri  
May 3, 2021*

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9 **I. EXECUTIVE SUMMARY**

10 On June 4, 2018, Union Electric Company, d/b/a Ameren Missouri (“Ameren Missouri”  
11 or “Company”) filed, in Case No. EO-2018-0211, its application under the Missouri  
12 EnergyEfficiency Investment Act<sup>1</sup> (“MEEIA”) and the Missouri Public Service Commission’s  
13 (“Commission”) MEEIA rules<sup>2</sup> for approval of its *2019 – 2024 Energy Efficiency Plan*. On  
14 October 25, 2018, Ameren Missouri filed a *Revised MEEIA 2019-2021 Energy Efficiency Plan*  
15 (“MEEIA 2019-2021 Plan”) or (“Cycle 3”). Concurrently, on October 25, 2018, Ameren  
16 Missouri, Staff of the Missouri Public Service Commission (“Staff”), the Office of the  
17 Public Counsel (“OPC”), Missouri Division of Energy (“DE”), Consumers Council of  
18 Missouri, Renew Missouri Advocates d/b/a Renew Missouri, National Housing Trust (“NHT”),  
19 and Tower Grove Neighborhood Community Development Corporation (“Tower Grove”),  
20 (collectively referred to as “Signatories”), submitted a *Stipulation and Agreement*  
21 (*“2019 Stipulation”*) for Commission approval of Ameren Missouri’s MEEIA 2019-2021  
22 Plan.<sup>3</sup>

23 Through its December 5, 2018 *Order Approving Stipulation and Agreement and*  
24 *Granting Waivers* in Case No. EO-2018-0211, the Commission authorized Ameren Missouri  
25 to implement, beginning March 1, 2019, the *2019 – 2021 Energy Efficiency Plan* including:  
26 1) nineteen (19) energy efficiency programs (“MEEIA programs”), and 2) a demand-side  
27 programs investment mechanism (“DSIM”). The MEEIA 2019-2021 Plan<sup>4</sup>, which was

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<sup>1</sup> Section 393.1075, RSMo, Supp. 2017.

<sup>2</sup> 20 CSR 4240-20.093 and 20 CSR 4240-20.094 which all had an effective date of September 30, 2019.

<sup>3</sup> As part of the 2019 Stipulation, the Signatories agreed that Ameren Missouri’s MEEIA low-income programs would be in effect from 2019 – 2024.

<sup>4</sup> Subsequent to December 5, 2018, the Plan was modified by Commission orders in Case No. EO-2018-0211 on the following effective dates: January 8, 2019; February 27, 2019; December 11, 2019; June 24, 2020; July 8, 2020; August 5, 2020; November 12, 2020; and December 1, 2020.

1 approved on December 5, 2018, included a total program cost budget of \$227,310,000<sup>5</sup> for all  
2 19 MEEIA programs, a throughput disincentive (“TD”), an Earnings Opportunity (“EO”)<sup>6</sup> of  
3 \$30 million at 100% performance, a technical reference manual (“TRM”) and a plan to perform  
4 evaluation measurement and verification (“EM&V”) of program cost effectiveness.

5 Through its August 5, 2020 Order Approving Stipulation and Agreements in Case  
6 No. EO-2018-0211, the Commission authorized Ameren Missouri to extend the existing  
7 MEEIA 2019-2021 Plan through Plan Year 2022 (“PY22”) with certain program modifications  
8 in PY22 and the addition of a new Pay As You Save® (“PAYS®”) program beginning in PY21  
9 to be in effect through PY22. The Signatories also agreed on the total budget cap for PY22 to  
10 be \$70 million.

11 Prior to the MEEIA 2019-2021 Plan, on July 20, 2017 in Case No. EO-2015-0055, the  
12 Commission authorized an *Order Approving Stipulation and Agreement*. This order approved  
13 an agreement among the signatories for a transition plan which allowed Ameren Missouri to  
14 accommodate the needs of customers who may have long-lead projects requiring up to two  
15 years beyond the end of MEEIA Cycle 2 for the issuance of a final rebate check as a result of  
16 completed long-lead projects. The transition plan also provided additional time beyond the  
17 two-year extension to complete impact measurement and verification and demand-side  
18 programs investment mechanism treatment for the long-lead projects.

19 The program costs and TD, including interest associated with both, are the costs  
20 subject to this prudence review, which is Staff’s fifth prudence review<sup>7</sup> of Ameren Missouri’s  
21 Rider EEIC costs.<sup>8</sup> Ameren Missouri’s MEEIA Cycle 2 Rider EEIC is included as Addendum  
22 A and Cycle 3 Rider EEIC is included as Addendum B to this Staff prudence review report  
23 (“Report”). The most recent periodic rate adjustment for the Cycle 3 Rider EEIC is in File  
24 No. ER-2021-0158.

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<sup>5</sup> On August 5, 2020, the Commission issued an *Order Approving Stipulation and Agreements*, which extended the MEEIA 2019-2021 Plan through PY2022 and increased the overall budget of \$70 million. The total program cost budget of \$227,310,000 does not include the increased budget of \$70 million.

<sup>6</sup> Appendix N.

<sup>7</sup> Prior Staff prudence reviews of Ameren Missouri’s Rider EEIC costs are in File Nos. EO-2015-0029, EO-2017-0023, EO-2018-0155, and EO-2019-0376. This report, EO-2021-0157, is the First Prudence Review of Cycle 3 of Costs Related to the Demand-Side Programs Investment Mechanism, in addition to reviewing the Cycle 2 Long-Lead Projects.

<sup>8</sup> On January 3, 2014, the Commission approved Ameren Missouri’s Cycle 1 Rider EEIC in File No. EO-2014-0075, thereby, changing the Company’s Cycle 1 DSIM from a tracker to a rider which provides for periodic rate adjustments between general rate proceedings. (20 CSR 4240-20.093(2)(A)9.)

1 Commission Rule 20 CSR 4240-20.093(10) requires that Ameren Missouri file  
2 quarterly, a Surveillance Monitoring Report. Confidential Addendum C to this Report is  
3 Page 6a (Cycle 2) of Ameren Missouri’s confidential Surveillance Monitoring Report  
4 including status of the MEEIA programs and DSIM costs for the quarter ended, and cumulative  
5 total ended September 30, 2020. Confidential Addendum D to this Report is Page 6b (Cycle 3)  
6 of Ameren Missouri’s confidential Surveillance Monitoring Report including status of the  
7 MEEIA programs and DSIM costs for the quarter ended, and cumulative total ended  
8 September 30, 2020. Table 1A and 1B below identify the line items and Review Period amounts  
9 from Addendum C and Addendum D, which are the subject of Staff’s prudence review.<sup>9</sup>

10 **Table 1A – Confidential**

11 \*\*

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<sup>9</sup> Staff’s prudence review is for the period of March 1, 2019 through September 30, 2020.

1 **Table 1B – Confidential**

2 \*\*

3 \*\*

4 Staff reviewed and analyzed a variety of items while examining whether Ameren Missouri  
5 prudently incurred program costs, TD and interest costs associated with the 2016-2018 Plan  
6 and the 2019-2021 Plan for the Review Period. Based on its review, Staff recommends the  
7 disallowance of costs in Table 2:

8 **Table 2**

<b>Costs</b>	<b>Explanation of Costs</b>	<b>Disallowed Cost</b>	<b>Interest</b>	<b>Total Disallowance</b>
Sponsorships	Page 22	\$303,877.50	\$3,586.60	\$307,464.10
<b>Total Disallowed Costs</b>		<b>\$303,877.50</b>	<b>\$3,586.60</b>	<b>\$307,464.10</b>

1 In addition to the recommended disallowances of costs in Table 2 above, Staff also wants to  
2 note the Ordered Adjustment from the last Ameren MEEIA prudence review<sup>10</sup> of \$50,000  
3 ordered by the Commission on March 11, 2020, was not included in the subsequent DSIM Rider  
4 filing. As such, Staff is also recommending the Company remove this \$50,000 Ordered  
5 Adjustment, plus 12 months of interest<sup>11</sup>, in the next DSIM Rider filing.

6 *Staff Expert/Witness: Brooke Mastrogiannis*

## 7 **II. INTRODUCTION**

### 8 **A. Prudence Standard**

9 Commission Rule 20 CSR 4240-20.093(11) requires that the Commission’s Staff  
10 conduct prudence reviews of an electric utility’s costs for its DSIM no less frequently than  
11 every twenty-four (24) months. This Report documents Staff’s first review of the prudence of  
12 Ameren Missouri’s MEEIA Cycle 3 program costs, Cycle 2 long-lead projects, Company TD  
13 and interest for the period March 1, 2019 through September 30, 2020 (“Review Period”).

14 In evaluating prudence, Staff reviews whether a reasonable person making the same  
15 decision would find both the information the decision-maker relied on and the process the  
16 decision-maker employed to be reasonable based on the circumstances at the time the decision  
17 was made, *i.e.*, without the benefit of hindsight. Instead, the review evaluates the decision in  
18 light of the reasonableness of the information the decision-maker relied on and the  
19 decision-making process the decision-maker employed. If either the information relied upon or  
20 the decision-making process employed was imprudent, then Staff examines whether the  
21 imprudent decision caused any harm to ratepayers. Only if an imprudent decision resulted in  
22 harm to ratepayers, will Staff recommend a refund. However, if an imprudent decision did not  
23 result in harm to Ameren Missouri’s customers, then Staff may further evaluate the  
24 decision-making process, and may recommend changes to the company’s business practice  
25 going forward.

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<sup>10</sup> Case No. EO-2019-0376.

<sup>11</sup> The 12 months interest would be calculated from the effective date of the last EEIC Rider filing, February 1, 2021, to the effective date of the next EEIC Rider filing, February 1, 2022, the time period for which the ordered adjustment should have been included.

1           **B. Staff Review and Reconciliation of FERC Accounts**

2           As a public utility, Ameren Missouri is required to maintain its books and records  
3 in accordance with the Federal Energy Regulatory Commission’s (“FERC”) Uniform  
4 System of Accounts (“USoA”). For the purpose of this MEEIA prudence review, Staff has  
5 focused its review on FERC Account 908 - Customer Assistance Expenses, FERC  
6 Account 930 – Administrative and General Expenses and FERC Account 932<sup>12</sup>. Ameren  
7 Missouri provides its monthly General Ledger to the Commission as ongoing surveillance data,  
8 which is a summary of all accounting transactions on a monthly basis. For the MEEIA Cycle  
9 II expenses, Staff filtered the General Ledger based on FERC Major Account 908 - Customer  
10 Assistance, Minor EED - Electric Energy Efficiency and Demand, and FERC Major Account  
11 930 – Administrative and General Expenses, Minor 228 – Industry Association Memberships  
12 and Related Expense. Both accounts have an Activity Code of M2PC<sup>13</sup>. The filtering process  
13 of the General Ledger provided, by month, the total amount of transactions by Activity  
14 Code and Resource Type that occurred during the month in FERC Accounts 908 and 930. For  
15 MEEIA Cycle III expenses, Staff filtered the General Ledger based on FERC Major Account  
16 908 – Customer Assistance, Minor EED – Electric Energy Efficiency and Demand, and FERC  
17 Major Account 932, Minor LOD - O & M Benefit Loaders, and Minor TAX – Social Security  
18 Tax Benefit Loaders. The MEEIA Cycle III expenses all have an Activity Code of M3PC<sup>14</sup>.

19           Staff reconciled FERC Accounts 908, 930, and 932 program costs provided by  
20 Ameren Missouri in response to Staff’s Data Request No. 0003 to the Surveillance Monitoring  
21 Reports page 6a and 6b<sup>15</sup> and the most recent Rider EEIC filing, Case No. ER-2021-0158<sup>16</sup>.  
22 Subsequently, Staff used the detail in Data Request No. 0003 and sorted it by month, project  
23 number, activity code, and resource type then reconciled these individual line item transactions  
24 to follow-up receipts and invoices requested by Staff. Staff analyzed these transactions and  
25 reconciled the monthly totals by project number and resource type.

26           *Staff Expert/Witness: Brooke Mastrogiannis*

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<sup>12</sup> As described in Data Request 00027.1, Account 932 for electric utilities is not a FERC major. Instead, the 932 account is used for managerial purposes to allocate costs to the correct cost center (RMC) and projects.

<sup>13</sup> M2PC acronym for Missouri Energy Efficiency Energy Act Program Costs – Cycle 2.

<sup>14</sup> M3PC acronym for Missouri Energy Efficiency Energy Act Program Costs – Cycle 3.

<sup>15</sup> Attached as Confidential Addendums C and D.

<sup>16</sup> Case No. ER-2021-0158 was filed and approved by the Commission after this Review Period of March 1, 2019 through September 30, 2020.



1     **III. ENERGY EFFICIENCY INVESTMENT RATE (EEIR) DETERMINATION**

2     **A. Overview of Program Costs**

3         **1. Description**

4         During this Review Period, there were breakdowns of expenses by Cycle 2 Long-Lead  
5 projects, Cycle 2 Non-Long Lead projects along with Cycle 3 expenses. Within those  
6 categories, Ameren Missouri’s program costs include incentive payments and administrative  
7 costs. Administrative costs include the following: program administration, general, education,  
8 marketing and communication, market potential study, data tracking, and Evaluation  
9 Measurement and Verification costs.

10         Staff reviewed all actual program costs, provided in response to Data Requests No. 0002  
11 and No. 0003, which Ameren Missouri is seeking to recover through its “Energy Efficiency  
12 Investment Charge” to insure only prudently incurred costs are recovered through the Rider  
13 EEIC. Staff reviewed and analyzed for prudence Ameren Missouri’s adherence to contractual  
14 obligations, resolution of problems, adequacy of controls, and compliance with approved tariff  
15 sheets. Upon Staff’s request, Ameren Missouri did provide documentation to support program  
16 costs incurred during the Review Period. Staff categorized these costs by program and  
17 segregated them between incentive payments and program administrative costs. Staff also  
18 reconciled program costs to the General Ledger FERC Accounts 908, 930, and 932 by month,  
19 project number, and resource type. (See the Staff Review and Reconciliation of FERC Accounts  
20 section for further explanation of process and review.)

21         The results of Staff categorizing program costs are in Table 3<sup>17</sup>, which is the total of  
22 ALL MEEIA program costs for this Review Period and also the breakdown by categories  
23 followed by Tables 3A (Cycle 2 Non-Long Lead program costs<sup>18</sup>), 3B (Cycle 2 Long-Lead  
24 program costs) and 3C (Cycle 3 program costs):

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<sup>17</sup> Table 3 was created from the information Ameren Missouri provided in Data Request No. 0002, 0003 and QSR.

<sup>18</sup> Ameren Missouri’s *2016-2018 Energy Efficiency Plan* officially ended on February 28, 2019. However, with any program of this nature a period of time is needed to finalize all energy efficiency projects that may have been scheduled or started but not completed by the official end of Ameren Missouri’s Plan. Staff reviewed the carry-over costs as reported by the Company in response to Staff’s Data Request 0003 for prudence and have summarized the results in Table 3A, 5, and 6.

Table 3

<b>Programs' Costs March 1, 2019 through September 30, 2020</b>			
<b>MEEIA SUMMARY ON ALL PROJECTS</b>			
<b>Program Description</b>	<b>Total for the Review Period Ending September 30, 2020</b>	<b>Administrative Costs</b>	<b>Incentives Paid</b>
<b>Low Income Programs</b>			
IE Multifamily J0HVM	\$ 3,497,772	\$ 1,718,717	\$ 1,779,055
IE Single Family J0HVN	\$ 4,705,897	\$ 2,293,739	\$ 2,412,158
IE Efficiency Housing Grant J0HX9	\$ 497,373	\$ 149,521	\$ 347,852
IE Social Service for Business J0HVP	\$ 922,232	\$ 52,048	\$ 870,184
MEEIA Co-Delivery LI Multifamily J0Q83	\$ 5,250	\$ 5,250	\$ -
MEEIA Co-Delivery LI Single Family J0Q84	\$ (65,082)	\$ (65,082)	\$ -
<b>Subtotal Low Income Programs</b>	<b>\$ 9,563,443</b>	<b>\$ 4,154,194</b>	<b>\$ 5,409,249</b>
<b>Residential Programs</b>			
Res Lighting J06DF	\$ 430,054	\$ 433,687	\$ (3,633)
Res Energy Efficient Products J06DG	\$ (146,153)	\$ (189,603)	\$ 43,450
Res HVAC J06DH	\$ 1,416,635	\$ 868,485	\$ 548,150
Res Low Income J06DK	\$ (445,278)	\$ (427,376)	\$ (17,903)
Res Kits J06DL	\$ (295,014)	\$ (293,376)	\$ (1,638)
Res Smart Thermostat J0C9S	\$ 9,251	\$ (5,449)	\$ 14,700
Home Energy Reports J0005	\$ (37,765)	\$ (37,765)	\$ -
Res Lighting J0HVC	\$ 9,965,453	\$ 3,725,910	\$ 6,239,543
Res Products J0HVD	\$ 2,275,068	\$ 775,400	\$ 1,499,668
Res HVAC J0HVF	\$ 17,643,773	\$ 5,526,123	\$ 12,117,650
Res Kits J0HVG	\$ 931,268	\$ 420,234	\$ 511,034
Res Home Energy Report J0HVB	\$ 3,126,654	\$ 3,126,654	\$ -
Res Appliance Recycling J0HVJ	\$ 632,691	\$ 521,893	\$ 110,798
Res Demand Response J0HVK	\$ 6,834,857	\$ 5,363,057	\$ 1,471,800
Res MF Market Rate J0HX8	\$ 1,288,129	\$ 659,898	\$ 628,231
Res General Expenses J0HVL	\$ 210,066	\$ 210,066	\$ -
Res STEM Education J0HXC	\$ 270,913	\$ 270,913	\$ -
Res Code Compliance J0HXD	\$ 486,328	\$ 486,328	\$ -
Res Smart Home Energy Management J0HXG	\$ 67,709	\$ 67,709	\$ -
Res Real Estate Audits J0HXH	\$ 115,597	\$ 115,597	\$ -
Res Employee Education J0HXJ	\$ 164,130	\$ 164,130	\$ -
MEEIA Pay As You Save (PAYS) J0QW4	\$ (475)	\$ (475)	\$ -
<b>Subtotal Residential Programs</b>	<b>\$ 44,943,891</b>	<b>\$ 21,782,042</b>	<b>\$ 23,161,849</b>

Table 3 (continued)

<p align="center"><b>Programs' Costs March 1, 2019 through September 30, 2020</b></p> <p align="center"><b>MEEIA SUMMARY ON ALL PROJECTS</b></p>			
<p align="center">Program Description</p>	<p align="center">Total for the Review Period Ending September 30, 2020</p>	<p align="center">Administrative Costs</p>	<p align="center">Incentives Paid</p>
<b>Business Programs</b>			
Biz Standard J06D8	\$ 2,095,688	\$ 240,227	\$ 1,855,461
Biz Custom J06D9	\$ 3,699,008	\$ 1,065,044	\$ 2,633,964
Biz Retro-Commissioning J06DB	\$ 344,145	\$ 251,954	\$ 92,191
Biz New Construction J06DC	\$ 1,591,652	\$ 185,859	\$ 1,405,792
Biz Program Gen Expense J06DD	\$ 61,473	\$ 61,473	\$ -
Small Business Direct J0006	\$ 142,586	\$ -	\$ 142,586
Biz Standard J0HV3	\$ 13,620,727	\$ 4,262,557	\$ 9,358,170
Biz Custom J0HV4	\$ 5,914,489	\$ 2,232,903	\$ 3,681,586
Biz Retro-Commissioning J0HV5	\$ 388,172	\$ 155,976	\$ 232,195
Biz New Construction J0HV6	\$ 899,959	\$ 385,270	\$ 514,688
Small Business Direct Ins (SBDI) J0HV7	\$ 1,883,063	\$ 299,147	\$ 1,583,916
Biz Demand Response J0HV9	\$ 1,192,691	\$ 1,192,691	\$ -
Biz General Expense J0HVB	\$ 1,308,968	\$ 1,308,968	\$ -
Biz Building Operator Cert (BOC) J0HXK	\$ 37,694	\$ 37,694	\$ -
<b>Subtotal Business Programs</b>	<b>\$ 33,180,315</b>	<b>\$ 11,679,764</b>	<b>\$ 21,500,550</b>
<b>Overhead</b>			
Education J06D3	\$ 3,600	\$ 3,600	\$ -
Data Tracking J06D6	\$ 74,451	\$ 74,451	\$ -
Potential Study J0HV1	\$ 995,655	\$ 367,425	\$ 628,231
Incremental Labor J0HWD	\$ 376,929	\$ 376,929	\$ -
Portfolio General Expense J0HDX	\$ 327,315	\$ 327,315	\$ -
Communications J0HV0	\$ 3,563,121	\$ 3,563,121	\$ -
EMV Income Eligible Programs J0HVQ	\$ 603,916	\$ 603,916	\$ -
EMV Res Programs J06DN	\$ 427,185	\$ 427,185	\$ -
EMV Res Programs J0HVR	\$ 2,768,631	\$ 2,768,631	\$ -
EMV Biz Programs J06DP	\$ 460,687	\$ 460,687	\$ -
EMV Biz Programs J0HVS	\$ 1,374,050	\$ 1,374,050	\$ -
EMV Res Demand Response J0HVV	\$ 392,372	\$ 392,372	\$ -
EMV Biz Demand Response J0HVW	\$ 278,594	\$ 278,594	\$ -
EMV Gen Expense J06DQ	\$ 19	\$ 19	\$ -
EMV Gen Expense J0HXB	\$ 50,761	\$ 50,761	\$ -
<b>Subtotal Overhead Costs</b>	<b>\$ 11,697,286</b>	<b>\$ 11,069,056</b>	<b>\$ 628,231</b>
<b>Total Program Costs</b>	<b>\$ 99,384,935</b>	<b>\$ 48,685,055</b>	<b>\$ 50,699,880</b>

Table 3A

<b>Programs' Costs March 1, 2019 through September 30, 2020</b>			
<b>MEEIA CYCLE 2 NON-LONG LEAD PROJECTS</b>			
<b>Program Description</b>	<b>Total for the Review Period Ending September 30, 2020</b>	<b>Administrative Costs</b>	<b>Incentives Paid</b>
<b>Residential Programs</b>			
Res Lighting J06DF	\$ 430,054	\$ 433,687	\$ (3,633)
Res Energy Efficient Products J06DG	\$ (146,153)	\$ (189,603)	\$ 43,450
Res HVAC J06DH	\$ 1,416,635	\$ 868,485	\$ 548,150
Res Low Income J06DK	\$ (445,278)	\$ (427,376)	\$ (17,903)
Res Kits J06DL	\$ (295,014)	\$ (293,376)	\$ (1,638)
Res Program Gen Expense J06DM	\$ -	\$ -	\$ -
Res Smart Thermostat J0C9S	\$ 9,251	\$ (5,449)	\$ 14,700
Home Energy Reports J0005	\$ (37,765)	\$ (37,765)	\$ -
<b>Subtotal Residential Programs</b>	<b>\$ 931,730</b>	<b>\$ 348,604</b>	<b>\$ 583,126</b>
<b>Business Programs</b>			
Biz Standard J06D8	\$ 1,426,460	\$ 145,717	\$ 1,280,743
Biz Custom J06D9	\$ 3,090,686	\$ 880,083	\$ 2,210,603
Biz Retro-Commissioning J06DB	\$ 164,700	\$ 72,509	\$ 92,191
Biz New Construction J06DC	\$ 622,608	\$ (65,347)	\$ 687,955
Biz Program Gen Expense J06DD	\$ 61,473	\$ 61,473	\$ -
Small Business Direct J0006	\$ 142,586	\$ -	\$ 142,586
<b>Subtotal Business Programs</b>	<b>\$ 5,508,513</b>	<b>\$ 1,094,435</b>	<b>\$ 4,414,078</b>
<b>Overhead</b>			
Education J06D3	\$ 3,600	\$ 3,600	\$ -
Data Tracking J06D6	\$ 74,451	\$ 74,451	\$ -
EMV Gen Expense J06DQ	\$ 19	\$ 19	\$ -
EMV Res Programs J06DN	\$ 427,185	\$ 427,185	\$ -
EMV Biz Programs J06DP	\$ 454,733	\$ 454,733	\$ -
<b>Subtotal Overhead Costs</b>	<b>\$ 959,988</b>	<b>\$ 959,988</b>	<b>\$ -</b>
<b>Total Program Costs</b>	<b>\$ 7,400,231</b>	<b>\$ 2,403,028</b>	<b>\$ 4,997,203</b>

Table 3B

<b>Programs' Costs March 1, 2019 through September 30, 2020</b>			
<b>MEEIA CYCLE 2 LONG-LEAD PROJECTS</b>			
<b>Program Description</b>	<b>Total for the Review Period Ending September 30, 2020</b>	<b>Administrative Costs</b>	<b>Incentives Paid</b>
<b>Residential Programs</b>			
Res Lighting J06DF	\$ -	\$ -	\$ -
Res Energy Efficient Products J06DG	\$ -	\$ -	\$ -
Res HVAC J06DH	\$ -	\$ -	\$ -
Res Low Income J06DK	\$ -	\$ -	\$ -
Res Kits J06DL	\$ -	\$ -	\$ -
Res Program Gen Expense J06DM	\$ -	\$ -	\$ -
Res Smart Thermostat J0C9S	\$ -	\$ -	\$ -
Home Energy Reports J0005	\$ -	\$ -	\$ -
<b>Subtotal Residential Programs</b>	<b>\$ -</b>	<b>\$ -</b>	<b>\$ -</b>
<b>Business Programs</b>			
Biz Standard J06D8	\$ 669,229	\$ 94,511	\$ 574,718
Biz Custom J06D9	\$ 608,322	\$ 184,961	\$ 423,361
Biz Retro-Commissioning J06DB	\$ 179,445	\$ 179,445	\$ -
Biz New Construction J06DC	\$ 969,044	\$ 251,206	\$ 717,837
<b>Subtotal Business Programs</b>	<b>\$ 2,426,039</b>	<b>\$ 710,123</b>	<b>\$ 1,715,917</b>
<b>Overhead</b>			
Education J06D3	\$ -	\$ -	\$ -
Data Tracking J06D6	\$ -	\$ -	\$ -
EMV Gen Expense J06DQ	\$ -	\$ -	\$ -
EMV Res Programs J06DN	\$ -	\$ -	\$ -
EMV Biz Programs J06DP	\$ 5,954	\$ 5,954	\$ -
<b>Subtotal Overhead Costs</b>	<b>\$ 5,954</b>	<b>\$ 5,954</b>	<b>\$ -</b>
<b>Total Program Costs</b>	<b>\$ 2,431,993</b>	<b>\$ 716,076</b>	<b>\$ 1,715,917</b>

Table 3C

<b>Programs' Costs March 1, 2019 through September 30, 2020</b>			
<b>MEEIA CYCLE 3 PROJECTS</b>			
<b>Program Description</b>	<b>Total for the Review Period Ending September 30, 2020</b>	<b>Administrative Costs</b>	<b>Incentives Paid</b>
<b>Low Income Programs</b>			
IE Multifamily J0HVM	\$ 3,497,772	\$ 1,718,717	\$ 1,779,055
IE Single Family J0HVN	\$ 4,705,897	\$ 2,293,739	\$ 2,412,158
IE Efficiency Housing Grant J0HX9	\$ 497,373	\$ 149,521	\$ 347,852
IE Social Service for Business J0HVP	\$ 922,232	\$ 52,048	\$ 870,184
MEEIA Co-Delivery LI Multifamily J0Q83	\$ 5,250	\$ 5,250	\$ -
MEEIA Co-Delivery LI Single Family J0Q84	\$ (65,082)	\$ (65,082)	\$ -
<b>Subtotal Low Income Programs</b>	<b>\$ 9,563,443</b>	<b>\$ 4,154,194</b>	<b>\$ 5,409,249</b>
<b>Residential Program</b>			
Res Lighting J0HVC	\$ 9,965,453	\$ 3,725,910	\$ 6,239,543
Res Products J0HVD	\$ 2,275,068	\$ 775,400	\$ 1,499,668
Res HVAC J0HVF	\$ 17,643,773	\$ 5,526,123	\$ 12,117,650
Res Kits J0HVG	\$ 931,268	\$ 420,234	\$ 511,034
Res Home Energy Report J0HVV	\$ 3,126,654	\$ 3,126,654	\$ -
Res Appliance Recycling J0HVJ	\$ 632,691	\$ 521,893	\$ 110,798
Res Demand Response J0HVK	\$ 6,834,857	\$ 5,363,057	\$ 1,471,800
Res MF Market Rate J0HX8	\$ 1,288,129	\$ 659,898	\$ 628,231
Res General Expenses J0HVL	\$ 210,066	\$ 210,066	\$ -
Res STEM Education J0HXC	\$ 270,913	\$ 270,913	\$ -
Res Code Compliance J0HXD	\$ 486,328	\$ 486,328	\$ -
Res Smart Home Energy Management J0HXG	\$ 67,709	\$ 67,709	\$ -
Res Real Estate Audits J0HXH	\$ 115,597	\$ 115,597	\$ -
Res Employee Education J0HXJ	\$ 164,130	\$ 164,130	\$ -
MEEIA Pay As You Save (PAYS) J0QW4	\$ (475)	\$ (475)	\$ -
<b>Subtotal Residential Programs</b>	<b>\$ 44,012,161</b>	<b>\$ 21,433,438</b>	<b>\$ 22,578,724</b>
<b>Business Program</b>			
Biz Standard J0HV3	\$ 13,620,727	\$ 4,262,557	\$ 9,358,170
Biz Custom J0HV4	\$ 5,914,489	\$ 2,232,903	\$ 3,681,586
Biz Retro-Commissioning J0HV5	\$ 388,172	\$ 155,976	\$ 232,195
Biz New Construction J0HV6	\$ 899,959	\$ 385,270	\$ 514,688
Small Business Direct Ins (SBDI) J0HV7	\$ 1,883,063	\$ 299,147	\$ 1,583,916
Biz Demand Response J0HV9	\$ 1,192,691	\$ 1,192,691	\$ -
Biz General Expense J0HVB	\$ 1,308,968	\$ 1,308,968	\$ -
Biz Building Operator Cert (BOC) J0HXK	\$ 37,694	\$ 37,694	\$ -
<b>Subtotal Business Programs</b>	<b>\$ 25,245,763</b>	<b>\$ 9,875,207</b>	<b>\$ 15,370,556</b>
<b>Overhead</b>			
Potential Study J0HV1	\$ 995,655	\$ 995,655	\$ -
Incremental Labor J0HWD	\$ 376,929	\$ 376,929	\$ -
Portfolio General Expense J0HDX	\$ 327,315	\$ 327,315	\$ -
Communications J0HV0	\$ 3,563,121	\$ 3,563,121	\$ -
EMV Income Eligible Programs J0HVQ	\$ 603,916	\$ 603,916	\$ -
EMV Res Programs J0HVR	\$ 2,768,631	\$ 2,768,631	\$ -
EMV Biz Programs J0HVS	\$ 1,374,050	\$ 1,374,050	\$ -
EMV Res Demand Response J0HVV	\$ 392,372	\$ 392,372	\$ -
EMV Biz Demand Response J0HVW	\$ 278,594	\$ 278,594	\$ -
EMV Gen Expense J0HXB	\$ 50,761	\$ 50,761	\$ -
<b>Subtotal Overhead Costs</b>	<b>\$ 10,731,344</b>	<b>\$ 10,731,344</b>	<b>\$ -</b>
<b>Total Program Costs</b>	<b>\$ 89,552,711</b>	<b>\$ 46,194,182</b>	<b>\$ 43,358,529</b>

1 Costs prior to this Review Period that were not reviewed in the last Ameren MEEIA prudence  
2 review because they were MEEIA Cycle 3 costs are not included in Tables 3 through 3C.  
3 Although they are not included in the tables above, Staff reviewed these costs during this  
4 prudence review and will continue to track these expenses in the overall cumulative total for  
5 MEEIA Cycle 3. The total of these costs are \$900,914.26 incurred during the months of  
6 May 2018 through February 2019. Staff has ensured interest was not accumulated on these costs  
7 until the start of Cycle 3 in March of 2019.

8 Ameren Missouri incurs administrative costs directly related to the implementation of  
9 its approved energy efficiency programs. Staff uses the term “administrative” to mean all costs  
10 other than incentives.<sup>19</sup> Staff reviewed each administrative category of cost to determine the  
11 reasonableness of each individual item of cost and if the costs were directly related to energy  
12 efficiency programs.

13 The Plan is budgeted for Administrative and Incentive program costs.<sup>20</sup> Table 4A<sup>21</sup>  
14 provides a comparison for the 3-year Plan in total, 2016-2018 for Administrative and Incentive  
15 Program Costs. Ameren Missouri’s 2016-2018 Plan in Table 4A was for 52%<sup>22</sup> of the total  
16 program costs to be used toward incentives, and the other 48%<sup>23</sup> towards administrative costs.  
17 The results in Table 5 indicate that Ameren Missouri improved this ratio, as it shows actual  
18 incentives were 62%<sup>24</sup> of the total Cycle 2 costs and the other 38% toward administrative costs.  
19 The results of the 2016-2018 Plan of categorizing program costs, administrative and incentives,  
20 are provided in Table 4A below.

21 Table 4B<sup>25</sup> provides a comparison for the 3-year Plan in total, 2019-2021 for  
22 Administrative and Incentive Program Costs. Ameren Missouri’s 2019-2021 Plan in Table 4B  
23 was 51% of the total program costs to be used towards incentives, and the other 49% towards  
24 administrative costs. The results in table 3C show actual incentives were 48%<sup>26</sup> during the

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<sup>19</sup> Incentives are program costs for direct and indirect incentive payments to encourage customer and/or retail partner participation in programs and the costs of measures, which are provided at no cost as a part of a program.

<sup>20</sup> Revised Appendix B and Appendix H of the February 5, 2016 Non-Unanimous Stipulation and Agreement.

<sup>21</sup> Table 4A was created from Revised Appendix B from the March 16, 2017 Non-Unanimous Stipulation and Agreement.

<sup>22</sup> This percentage is calculated from total incentives over total portfolio in Table 4A.

<sup>23</sup> This percentage is calculated from total administrative costs over total portfolio in Table 4A.

<sup>24</sup> This percentage is calculated from total incentives over total portfolio in Table 5.

<sup>25</sup> Table 4B was created from updated Appendix A approved by the Commission on July 10, 2020 in Case No. EO-2018-0211.

<sup>26</sup> This percentage is calculated from total incentives over total program costs in Table 3C.

1 Review Period compared to the 51% in Ameren Missouri's 2019-2021 Plan. Even though this  
 2 ratio has not been met based on the 2019-2021 Plan, Staff will continue to monitor the actual  
 3 results compared to the Plan throughout the life of Cycle 3. The results of the 2019-2021 Plan  
 4 of categorizing program costs, administrative and incentives, are provided in Table 4B below  
 5 as well.

6 **Table 4A**

<b>Ameren Missouri 2016-2018 plan for Administrative and Incentive Program Costs (in millions)</b>			
<b>MEEIA Programs</b>	<b>Administrative</b>	<b>Incentives</b>	<b>Total</b>
Res. Lighting	\$ 6.65	\$ 7.64	\$ 14.29
Res. Efficient Products	\$ 2.53	\$ 2.53	\$ 5.06
Res. HVAC	\$ 12.28	\$ 13.01	\$ 25.29
Learning Thermostats*	\$ 1.07	\$ 2.81	\$ 3.88
Res. Low Income	\$ 3.94	\$ 6.81	\$ 10.75
Res. EE Kits	\$ 2.54	\$ 1.60	\$ 4.14
Res. Home Energy Reports	\$ 4.30	\$ 0.00	\$ 4.30
<b>Total Residential Programs</b>	<b>\$ 33.31</b>	<b>\$ 34.40</b>	<b>\$ 67.71</b>
Bus. Standard	\$ 10.50	\$ 11.53	\$ 22.03
Bus. Custom	\$ 24.71	\$ 27.27	\$ 51.98
Bus. Retro Commissioning	\$ 2.94	\$ 3.98	\$ 6.92
Bus. New Construction	\$ 2.08	\$ 2.74	\$ 4.82
Bus. Small Business Direct Install	\$ 4.03	\$ 5.70	\$ 9.73
<b>Total Business Programs</b>	<b>\$ 44.26</b>	<b>\$ 51.22</b>	<b>\$ 95.48</b>
<b>Total Portfolio</b>	<b>\$ 77.57</b>	<b>\$ 85.62</b>	<b>\$ 163.19</b>
*Learning Thermostats were incorporated into the Efficient Products and HVAC programs instead of being implemented as a separate program			

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Table 4B

<b>Ameren Missouri 2019-2021 Plan for Administrative and Incentive Program Costs (in millions)</b>			
<b>MEEIA Programs</b>	<b>Administrative</b>	<b>Incentives</b>	<b>Total</b>
Multifamily Low-Income	\$ 11.06	\$ 16.02	\$ 27.08
Single Family Low-Income	\$ 10.98	\$ 11.31	\$ 22.29
Business Social Services	\$ 1.11	\$ 3.57	\$ 4.68
Targeted Community LED Lighting	\$ 1.01	\$ 0.44	\$ 1.45
<b>Total Low Income Programs</b>	<b>\$ 24.16</b>	<b>\$ 31.34</b>	<b>\$ 55.50</b>
Residential Appliance Recycling	\$ 1.12	\$ 0.59	\$ 1.71
Efficient Products	\$ 3.57	\$ 4.85	\$ 8.42
Energy Efficient Kits	\$ 1.43	\$ 2.41	\$ 3.84
Home Energy Report	\$ 1.51	\$ 4.34	\$ 5.85
HVAC	\$ 22.28	\$ 29.08	\$ 51.36
Lighting	\$ 2.73	\$ 2.99	\$ 5.72
Multifamily Market Rate	\$ 3.44	\$ 1.88	\$ 5.32
PAYS	\$ 1.07	\$ 2.12	\$ 3.19
Residential Demand Response*	\$ 21.22	\$ -	\$ 21.22
Residential Education	\$ 2.85	\$ -	\$ 2.85
<b>Total Residential Programs</b>	<b>\$ 61.22</b>	<b>\$ 48.26</b>	<b>\$ 109.48</b>
Custom	\$ 20.43	\$ 30.62	\$ 51.05
New Construction	\$ 2.13	\$ 2.98	\$ 5.11
Retro-Commissioning	\$ 2.19	\$ 3.55	\$ 5.74
Small Business Direct Install	\$ 3.71	\$ 6.70	\$ 10.41
Standard	\$ 13.48	\$ 23.91	\$ 37.39
Strategic Energy Management	\$ -	\$ -	\$ -
Business Demand Response*	\$ 12.54	\$ -	\$ 12.54
Business Education	\$ 0.24	\$ -	\$ 0.24
<b>Total Business Programs</b>	<b>\$ 54.72</b>	<b>\$ 67.76</b>	<b>\$ 122.48</b>
<b>Total Portfolio</b>	<b>\$ 140.10</b>	<b>\$ 147.36</b>	<b>\$ 287.46</b>
* EM&V and Miscellaneous Costs are included			

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Ameren Missouri provides incentive payments to its customers as part of its Plan. Incentive payments are an important instrument for encouraging investment in energy efficient technologies and products by lowering higher upfront costs for energy efficiency measures compared to the cost of less efficient measures. Incentive payments can also complement other efficiency policies such as appliance standards and energy codes to help overcome market barriers for cost-effective technologies. Prior to Cycle 3, Ameren Missouri paid for and used VISION software to track all of the incentive payments between its contracted vendors and

1 Ameren Missouri's general ledger. However, during the last MEEIA prudence review Staff was  
2 unable to reconcile the incentive payments in the general ledger detail to the reports generated  
3 from VISION. Since the last MEEIA prudence review, Ameren Missouri has told Staff VISION  
4 is no longer being used. All of the business programs are now tracked in TRC's database (TRC<sup>27</sup>  
5 is the contractor for the business programs) and residential programs are tracked in Franklin  
6 Energy's database (Franklin Energy is the contractor for the residential programs).

7 TRC enters incentives and energy savings submitted by the customer into the TRC  
8 database for each energy efficiency program project. Upon completion, the energy efficiency  
9 project is flagged to be invoiced. Then, on the last Friday of each month TRC's accounting  
10 group submits the month's invoice that includes incentives, and the month-end energy savings  
11 reports are provided to Ameren Missouri. After Ameren Missouri performs month-end invoice  
12 and savings validation procedures, the invoice is approved to be paid. Once the invoice is  
13 approved, the payment date is generated, and the activity posts to the general ledger on the same  
14 day that the payment is executed.<sup>28</sup>

15 Franklin Energy's vendors input incentives and energy savings into Franklin Energy's  
16 efficiency manager database. The kWh and incentive amounts are recorded in the end of month  
17 reports as well as the monthly invoices sent to Ameren. After Ameren Missouri performs  
18 month-end invoice and savings validation procedures the invoice is approved to be paid. The  
19 Franklin Energy incentives invoices are sent directly from Franklin Energy Services to the  
20 Ameren Missouri Principal Accounting Clerk by email. Those emails are then received in the  
21 Oracle processing system for payment. The incentive invoices are preapproved and do not  
22 require any additional approvals upon receipt. As a result, payment of the invoices generate  
23 automatically and invoices are paid within 1-2 business days after the invoice has been received  
24 into Oracle. The activity posts to the general ledger on the same day that the payment is  
25 executed.<sup>29</sup>

26 Ameren Missouri has explained to Staff that these systems can be difficult to navigate  
27 and pull live data that matches historical invoices and reporting since those historical invoices  
28 represent snapshots of the data at those times. Ameren Missouri has provided Staff with reports

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<sup>27</sup> Per the response to Data Request 0007, Lockheed Martin Corporation sold its distributed energy solutions business to TRC on November 18, 2019.

<sup>28</sup> Data Request 0009.3

<sup>29</sup> Data Request 0009.3.

1 that contain project level data from TRC and Franklin Energy. For each project, the incentive  
2 cost and corresponding invoice are provided as well as the kWh savings. As requested by Staff,  
3 Ameren Missouri provided a reconciliation of the TRC and Franklin Energy summary of  
4 incentives by invoice from the TRC and Franklin Energy tracking system reports, compared to  
5 the general ledger and compared to the actual invoices provided in DR 0013. As a result of  
6 these reconciliations provided by Ameren Missouri, along with the additional invoices and/or  
7 invoice corrections that were reflected outside of the Review Period, Staff was able to reconcile  
8 the general ledger total to the invoices provided by project.

9 Now that Ameren Missouri is no longer using VISION, and instead their incentives and  
10 savings are tracked in TRC and Franklin Energy's database, Staff is of the opinion that this new  
11 tracking system creates a clearer and more accurate validation of data among all sources of  
12 incentive information.

13 Please refer to Table 5<sup>30</sup> for all costs for MEEIA Cycle 2. Please refer to Table 6<sup>31</sup> for  
14 a comparison of the total actual costs and proposed (budgeted) costs for MEEIA Cycle 2.  
15 Ameren Missouri's MEEIA Cycle 2 actual costs were approximately \$6 million under the  
16 proposed budget and provided more incentives in the program with less administration costs.

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<sup>30</sup> Table 5 was created from a total of this prudence review Periods total Program Cost (from Data Request No. 0003) and the last two prudence Review Periods total Program Costs. The Long-Lead projects are also included since they were part of the Cycle 2 expenses.

<sup>31</sup> Table 6 was created from total Program Costs (from Data Request No. 0003) and the total Program Cost budget (Revised Appendix B from the March 16, 2017 Non-Unanimous Stipulation and Agreement).

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**Table 5**  
**Programs' Costs March 1, 2016 through September 30, 2020**

<b>CYCLE 2 PROGRAM COSTS</b>			
<b>(in millions)</b>			
<b>Program Description</b>	<b>Total for the Review Periods Ending September 30, 2020</b>	<b>Administrative Costs</b>	<b>Incentives Paid</b>
<b>Residential Programs</b>			
Res Lighting J06DF	\$ 7.67	\$ 3.62	\$ 4.05
Res Energy Efficient Products J06DG	\$ 3.59	\$ 1.26	\$ 2.33
Res HVAC J06DH	\$ 33.58	\$ 9.97	\$ 23.60
Res Low Income J06DK	\$ 8.33	\$ 3.51	\$ 4.82
Res Kits J06DL	\$ 2.44	\$ 0.85	\$ 1.58
Res Program Gen Expense J06DM	\$ 0.21	\$ 0.21	\$ -
Res Smart Thermostat J0C9S	\$ 2.91	\$ 0.76	\$ 2.15
Home Energy Reports J0005	\$ 2.40	\$ 2.40	\$ -
<b>Subtotal Residential Programs</b>	<b>\$ 61.12</b>	<b>\$ 22.58</b>	<b>\$ 38.54</b>
<b>Business Programs</b>			
Biz Standard J06D8	\$ 39.53	\$ 9.56	\$ 29.97
Biz Custom J06D9	\$ 29.68	\$ 11.00	\$ 18.68
Biz Retro-Commissioning J06DB	\$ 2.05	\$ 0.86	\$ 1.19
Biz New Construction J06DC	\$ 6.79	\$ 1.80	\$ 4.99
Biz Program Gen Expense J06DD	\$ 2.17	\$ 2.17	\$ -
Biz Benchmarking J0DH0	\$ 0.13	\$ 0.13	\$ -
Small Business Direct J0006	\$ 4.92	\$ 0.59	\$ 4.33
<b>Subtotal Business Programs</b>	<b>\$ 85.25</b>	<b>\$ 26.09</b>	<b>\$ 59.16</b>
<b>Overhead</b>			
Education J06D3	\$ 0.08	\$ 0.08	\$ -
Marketing J06D4	\$ 0.01	\$ 0.01	\$ -
Potential Study J06D5	\$ 0.47	\$ 0.47	\$ -
Data Tracking J06D6	\$ 0.33	\$ 0.33	\$ -
General Expense J06D7	\$ 0.40	\$ 0.40	\$ -
Communications J06DR	\$ 2.45	\$ 2.45	\$ -
Research and Development J000P	\$ 0.22	\$ 0.22	\$ -
EMV Gen Expense J06DQ	\$ 0.05	\$ 0.05	\$ -
EMV Res Programs J06DN	\$ 2.99	\$ 2.99	\$ -
EMV Biz Programs J06DP	\$ 3.60	\$ 3.60	\$ -
<b>Subtotal Overhead Costs</b>	<b>\$ 10.60</b>	<b>\$ 10.60</b>	<b>\$ -</b>
<b>Total Program Costs</b>	<b>\$ 156.96</b>	<b>\$ 59.27</b>	<b>\$ 97.70</b>

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Table 6

Actual vs Proposed Costs March 1, 2016 through September 30, 2020 (in millions)

Cycle 2 Program Costs

Program Description	Actual Total Costs	Proposed Total Costs	Var	Actual Admin Costs	Proposed Admin Costs	Var	Actual Incentives Paid	Proposed Incentives Paid	Var
<b>Residential Program</b>									
Res Lighting J06DF	\$ 7.67	\$ 14.29	\$ (6.62)	\$ 3.62	\$ 6.65	\$ (3.03)	\$ 4.05	\$ 7.64	\$ (3.59)
Res Energy Efficient Products J06DG	\$ 3.59	\$ 5.06	\$ (1.47)	\$ 1.26	\$ 2.53	\$ (1.27)	\$ 2.33	\$ 2.53	\$ (0.20)
Res HVAC J06DH	\$ 33.58	\$ 25.29	\$ 8.29	\$ 9.97	\$ 12.28	\$ (2.31)	\$ 23.60	\$ 13.01	\$ 10.59
Learning Thermostats*	\$ -	\$ 3.88	\$ (3.88)	\$ -	\$ 1.07	\$ (1.07)	\$ -	\$ 2.81	\$ (2.81)
Res Low Income J06DK	\$ 8.33	\$ 10.75	\$ (2.42)	\$ 3.51	\$ 3.94	\$ (0.43)	\$ 4.82	\$ 6.81	\$ (1.99)
Res Kits J06DL	\$ 2.44	\$ 4.14	\$ (1.70)	\$ 0.85	\$ 2.54	\$ (1.69)	\$ 1.58	\$ 1.60	\$ (0.02)
Res Program Gen Expense J06DM	\$ 0.21	\$ -	\$ 0.21	\$ 0.21	\$ -	\$ 0.21	\$ -	\$ -	\$ -
Res Smart Thermostat J0C9S	\$ 2.91	\$ -	\$ 2.91	\$ 0.76	\$ -	\$ 0.76	\$ 2.15	\$ -	\$ 2.15
Home Energy Reports J0005	\$ 2.40	\$ 4.30	\$ (1.90)	\$ 2.40	\$ 4.30	\$ (1.90)	\$ -	\$ -	\$ -
<b>Subtotal Residential Programs</b>	<b>\$ 61.12</b>	<b>\$ 67.71</b>	<b>\$ (6.59)</b>	<b>\$ 22.58</b>	<b>\$ 33.31</b>	<b>\$ (10.73)</b>	<b>\$ 38.54</b>	<b>\$ 34.40</b>	<b>\$ 4.14</b>
<b>Business Program</b>									
Biz Standard J06D8	\$ 39.53	\$ 22.03	\$ 17.50	\$ 9.56	\$ 10.50	\$ (0.94)	\$ 29.97	\$ 11.53	\$ 18.44
Biz Custom J06D9	\$ 29.68	\$ 51.98	\$ (22.30)	\$ 11.00	\$ 24.71	\$ (13.71)	\$ 18.68	\$ 27.27	\$ (8.59)
Biz Retro-Commissioning J06DB	\$ 2.05	\$ 6.92	\$ (4.87)	\$ 0.86	\$ 2.94	\$ (2.08)	\$ 1.19	\$ 3.98	\$ (2.79)
Biz New Construction J06DC	\$ 6.79	\$ 4.82	\$ 1.97	\$ 1.80	\$ 2.08	\$ (0.28)	\$ 4.99	\$ 2.74	\$ 2.25
Biz Program Gen Expense J06DD	\$ 2.17	\$ -	\$ 2.17	\$ 2.17	\$ -	\$ 2.17	\$ -	\$ -	\$ -
Biz Benchmarking J0DHO	\$ 0.13	\$ -	\$ 0.13	\$ 0.13	\$ -	\$ 0.13	\$ -	\$ -	\$ -
Small Business Direct J0006	\$ 4.92	\$ 9.73	\$ (4.81)	\$ 0.59	\$ 4.03	\$ (3.44)	\$ 4.33	\$ 5.70	\$ (1.37)
<b>Subtotal Business Programs</b>	<b>\$ 85.25</b>	<b>\$ 95.48</b>	<b>\$ (10.23)</b>	<b>\$ 26.09</b>	<b>\$ 44.26</b>	<b>\$ (18.17)</b>	<b>\$ 59.16</b>	<b>\$ 51.22</b>	<b>\$ 7.94</b>
Education J06D3	\$ 0.08	\$ -	\$ 0.08	\$ 0.08	\$ -	\$ 0.08	\$ -	\$ -	\$ -
Marketing J06D4	\$ 0.01	\$ -	\$ 0.01	\$ 0.01	\$ -	\$ 0.01	\$ -	\$ -	\$ -
Potential Study J06D5	\$ 0.47	\$ -	\$ 0.47	\$ 0.47	\$ -	\$ 0.47	\$ -	\$ -	\$ -
Data Tracking J06D6	\$ 0.33	\$ -	\$ 0.33	\$ 0.33	\$ -	\$ 0.33	\$ -	\$ -	\$ -
General Expense J06D7	\$ 0.40	\$ -	\$ 0.40	\$ 0.40	\$ -	\$ 0.40	\$ -	\$ -	\$ -
Communications J06DR	\$ 2.45	\$ -	\$ 2.45	\$ 2.45	\$ -	\$ 2.45	\$ -	\$ -	\$ -
Research and Development J000P	\$ 0.22	\$ -	\$ 0.22	\$ 0.22	\$ -	\$ 0.22	\$ -	\$ -	\$ -
EMV Gen Expense J06DQ	\$ 0.05	\$ -	\$ 0.05	\$ 0.05	\$ -	\$ 0.05	\$ -	\$ -	\$ -
EMV Res Programs J06DN	\$ 2.99	\$ -	\$ 2.99	\$ 2.99	\$ -	\$ 2.99	\$ -	\$ -	\$ -
EMV Biz Programs J06DP	\$ 3.60	\$ -	\$ 3.60	\$ 3.60	\$ -	\$ 3.60	\$ -	\$ -	\$ -
<b>Subtotal Overhead Costs</b>	<b>\$ 10.60</b>	<b>\$ -</b>	<b>\$ 10.60</b>	<b>\$ 10.60</b>	<b>\$ -</b>	<b>\$ 10.60</b>	<b>\$ -</b>	<b>\$ -</b>	<b>\$ -</b>
<b>Total Program Costs</b>	<b>\$ 156.96</b>	<b>\$ 163.19</b>	<b>\$ (6.23)</b>	<b>\$ 59.27</b>	<b>\$ 77.57</b>	<b>\$ (18.30)</b>	<b>\$ 97.70</b>	<b>\$ 85.62</b>	<b>\$ 12.08</b>

2. Summary of Cost Implications

If Ameren Missouri was imprudent in its decisions relating to the administration and implementation of the Residential and Business Energy Efficiency Programs, ratepayer harm could result in an increase in future Energy Efficiency Investment Charges.

1                   **3. Conclusion**

2                   Staff found Ameren Missouri did act imprudently by including sponsorship costs  
3 associated with its Energy Efficiency Programs resulting in ratepayer harm. Details of the  
4 inappropriate costs and Staff’s recommended adjustments are detailed below in Section B of  
5 this Report, and also in Table 2 of the Executive Summary.

6                   **4. Documents Reviewed**

- 7                   a. Ameren Missouri’s *2016 – 2018 Energy Efficiency Plan*;  
8                   b. Ameren Missouri’s *2019-2021 Energy Efficiency Plan*;  
9                   c. Approved MEEIA Energy Efficiency and Demand Side Management  
10                  Programs Tariff Sheets;  
11                  d. Staff Data Requests: 0001, 0002, 0003, 0003.1, 0003.2, 0003.3, 0003.4,  
12                  0003.5, 0003.6, 0003.7, 0003.8 0009, 0009.1, 0009.2, 0009.3, 0009.4, 0013,  
13                  0014, 0018; and  
14                  e. General Ledger FERC Accounts 908, 930, and 932.

15 *Staff Experts/Witnesses: Cynthia M. Tandy (Program Cost); Brooke Mastrogiannis*  
16 *(Tracking System)*

17                   **B. Sponsorships**

18                   **1. Description**

19                   Ameren Missouri incurred costs related to sponsorships during this Review Period. Staff  
20 reviewed these costs categorized by Ameren Missouri in the General Ledger FERC Major  
21 Account 908 - Customer Assistance, Minor EED - Electric Energy Efficiency and Demand,  
22 recorded during the Review Period for a total of \$303,877.50. These costs involved the  
23 sponsorship of the St. Louis Cardinals, including a sign in Busch Stadium. This sign in the  
24 stadium states, “Helping Illinois and Missouri Save More. Ameren.com/rebates”. Staff’s review  
25 of the Cardinals sponsorship contract between Ameren and the St. Louis Cardinal organization,  
26 included a lot of “extra benefits” for Ameren Missouri such as tickets to baseball games, food  
27 and beverages, party room access, batting practice viewing, etc.

28                   In its evaluation of allowable advertising costs, Staff relied on the principles that the  
29 Commission previously determined appropriate in KCPL Case No. EO-85-185, et al<sup>32</sup>. As a

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<sup>32</sup> Re: Kansas City Power and Light Company, 28 Mo.P.S.C. (N.S.) 228,269-71 (1986).

1 result of the decision in that case, the Commission has subsequently recognized five categories  
2 of advertisements, and specific rate treatment for each of the following categories:

- 3 1. General-Informational advertising that is useful in the provision of adequate service;
- 4 2. Safety-Advertising which conveys the ways to safely use electricity and to avoid  
5 accidents;
- 6 3. Promotional-Advertising used to encourage or promote the use of electricity;
- 7 4. Institutional-Advertising used to improve the company's public image; and
- 8 5. Political: advertising associated with political issues.

9  
10 The Commission adopted these categories of advertising costs and provided the  
11 rationale that a utility's revenue requirement should: 1) always include the reasonable and  
12 necessary cost of general and safety advertisements; 2) never include the cost of institutional or  
13 political advertisements; and 3) include the cost of promotional advertisements only to the  
14 extent that the utility can provide cost-justification for the advertisement.

15 Based upon Staff's review, Staff has determined the costs associated with the  
16 advertising related to Ameren Missouri's sponsorship of the St. Louis Cardinal's baseball team  
17 to be categorized as institutional advertising as it seems to promote the overall Ameren Missouri  
18 public image and does not have a direct correlation to MEEIA energy efficiency. Staff has also  
19 determined the "extra benefits" do not provide direct and quantifiable benefit to all ratepayers.  
20 Staff determined that the St. Louis Cardinal sponsorship does not meet the appropriate standard  
21 that would allow for recovery through Ameren Missouri's EEIC Rider.

22 As a result of this review and using this guidance from the Commission, Staff  
23 recommends a disallowance of \$303,877.50 plus interest of \$3,586.60 for a total of \$307,464.10  
24 as shown in Table 2 of this Report for non-MEEIA costs billed to Ameren Missouri's  
25 customers.

## 26 **2. Summary of Cost Implications**

27 If Ameren Missouri was imprudent in its decisions on sponsorships, ratepayer harm  
28 could result in an increase in Energy Efficiency Investment Charge billed amounts.

## 29 **3. Conclusion**

30 Ameren Missouri was imprudent when it included certain sponsorships as MEEIA  
31 costs. Staff recommends the Commission order an adjustment in the amount of \$303,877.50  
32 plus interest of \$3,586.60 for a total of **\$307,464.10**.

1                   **4. Documents Reviewed**

- 2                   a. Ameren Missouri’s 2016-2018 Energy Efficiency Plan;
- 3                   b. Ameren Missouri’s 2019-2021 Energy Efficiency Plan;
- 4                   c. Approved MEEIA Energy Efficiency and Demand Side Management
- 5                   Programs and Tariff Sheets;
- 6                   d. Staff Accounting Position Paper on Advertising
- 7                   e. Staff Report in Case No. EO-2017-0023;
- 8                   f. Rider EEIC; and
- 9                   g. Staff Data Requests: 0003, 0003.6 and 0018.

10 *Staff Expert/Witness: Cynthia M. Tandy*

11                   **C. Travel, Conferences and Other Program Expenses**

12                   **1. Description**

13                   Staff reviewed other expenses (travel, conferences, purchase rate, etc.) during this

14 Review Period, including Cycle 3 expenses that were incurred prior to the start of Cycle 3<sup>33</sup>.

15 During this review, Staff sent Data Requests for more detail on a number of expenses, including

16 Cycle 3 expenses that were incurred prior to the start of Cycle 3. Ameren Missouri either

17 provided the proper backup or explanation of the expense for Staff to agree those expenses

18 should be allowed within the MEEIA DSIM Rider or Ameren Missouri agreed to reverse

19 expenses. Those reversal entries were provided to Staff prior to the presentation of this Report,

20 but after the Review Period.

21                   **2. Summary of Cost Implications**

22                   If Ameren Missouri was imprudent in its decision relating to employee travel and

23 training, conferences, purchase rates, etc. ratepayer harm could result in an increase in Energy

24 Efficiency Investment Charge billed amounts.

25                   **3. Conclusion**

26                   Since Ameren Missouri either provided proper support for, or agreed to reverse, certain

27 miscellaneous other expenses, Staff found no indications of imprudence.

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<sup>33</sup> See Staff’s description of these costs prior to the start date of Cycle 3 on page 13 of this Report, lines 1 through 7.



1                   **4. Documents Reviewed**

- 2                   a. Ameren Missouri’s 2016-2018 Energy Efficiency Plan;
- 3                   b. Ameren Missouri’s 2019-2021 Energy Efficiency Plan;
- 4                   c. Approved MEEIA Energy Efficiency and Demand Side Management
- 5                   Programs and Tariff Sheets;
- 6                   d. Rider EEIC;
- 7                   e. Phone Meeting with Bill Davis and Angie Hwang (Ameren Missouri Staff);
- 8                   and,
- 9                   f. Staff Data Requests: 0003, 0003.4, 0003.5, 0003.7, 0003.8, 0014.

10 *Staff Expert/Witness: Cynthia M. Tandy*

11                   **D. Implementation Contractors**

12                   **1. Description**

13                   Ameren Missouri hired business partners for design, implementation and delivery of its

14 portfolio of residential and business energy efficiency programs. Contracting with competent,

15 experienced, and reliable program implementers is extremely important to the success of

16 Ameren Missouri’s energy efficiency programs and for affording Ameren Missouri’s customers

17 the greatest benefits.

18                   Ameren Missouri selected and contracted with the organizations identified in Table 8

19 to implement individual MEEIA programs. All of the implementers identified in Table 8 are

20 nationally recognized contractors that have solid histories of energy efficiency programs’

21 design and implementation.

22                   **Table 8**

<b>Review Period March 1, 2019 through September 30, 2020</b>				
<b>MEEIA Programs</b>	<b>Planned Annual Energy Savings (kWh)</b>	<b>Planned Annual Demand Savings (kW)</b>	<b>Program Implementers</b>	<b>Program EM&amp;V Contractors</b>
Appliance Recycling	6,309,328	906	Franklin Energy	Opinion Dynamics
Efficient Products	20,829,924	5,461	Franklin Energy	Opinion Dynamics
Energy Efficient Kits	12,738,107	2,254	Franklin Energy	Opinion Dynamics
Home Energy Report	35,250,000	16,429	Franklin Energy	Opinion Dynamics
HVAC	88,408,528	46,753	Franklin Energy	Opinion Dynamics
Lighting	35,168,270	5,249	Franklin Energy	Opinion Dynamics
Multifamily Income Eligible	2,137,500	949	Franklin Energy	Opinion Dynamics

Multifamily Market Rate	5,271,497	1,612	Franklin Energy	Opinion Dynamics
Res Demand Response	2,113,845	21,497	Franklin Energy	Opinion Dynamics
Single Family Income Eligible	7,180,953	2,219	Franklin Energy	Opinion Dynamics
Single Family Income Eligible-Grants	9,186,454	1,368	Franklin Energy	Opinion Dynamics
Business Social Services	2,480,284	474	TRC	Opinion Dynamics
Custom	92,189,609	27,583	TRC	Opinion Dynamics
New Construction	10,472,161	2,779	TRC	Opinion Dynamics
Retro-Commissioning	8,608,056	3,157	TRC	Opinion Dynamics
Small Business Direct Install	17,330,645	3,001	TRC	Opinion Dynamics
Standard	76,140,607	15,582	TRC	Opinion Dynamics
Strategic Energy Management	0	-		
Biz Demand Response	875,000	43,750	Enel X	Opinion Dynamics
<b>Total Portfolio</b>	<b>432,690,768</b>	<b>201,023</b>		

Staff examined the contracts between Ameren Missouri and the implementers in an effort to determine if the terms of the contract were followed during the implementation of the residential and business programs. During the review of invoices, Franklin Energy and TRC invoices were cross-checked to the general ledger<sup>34</sup> and all invoices were reviewed.

**2. Summary of Cost Implications**

If Ameren Missouri was imprudent in its decisions relating to the supervision of its program implementers, ratepayer harm could result in an increase in the future Energy Efficiency Investment Charge amounts.

**3. Conclusion**

Staff found no indication that Ameren Missouri has acted imprudently regarding the supervision of its program implementers.

**4. Documents Reviewed**

- a. Ameren Missouri’s 2019 – 2021 Energy Efficiency Plan;
- b. Approved MEEIA Energy Efficiency and Demand Side Management Programs Tariff Sheets;
- c. Staff Data Requests: 0002, 0003, 0004, 0007, 0008, 0013 and 0017.

*Staff Expert/Witness: Lisa Wildhaber*

<sup>34</sup> General Ledger for the period under review was provided in response to Data Request 0003.

1           **E. Billed Program Costs**

2           **1. Description**

3           For the Review Period, Ameren Missouri billed customers through a separate line item  
4 on customers' bills titled "Energy Efficiency Investment Charge" to recover estimated energy  
5 efficiency programs' costs and estimated Company's TD. The "Energy Efficiency Investment  
6 Charge" is based on the customer's monthly consumption and the applicable energy efficiency  
7 investment rates approved by the Commission in Case No. ER-2021-0158.<sup>35</sup> During the Review  
8 Period of March 1, 2019 through September 30, 2020, Ameren Missouri billed customers  
9 \$2,200,046 to recover its estimated energy efficiency programs' costs for MEEIA Cycle II.  
10 For the same period, Ameren Missouri actually spent \$9,832,224 on its energy efficiency  
11 programs. Thus, Ameren Missouri under-collected \$7,632,178 from its customers during the  
12 Review Period for MEEIA Cycle II Program Costs. During this same Review Period, Ameren  
13 Missouri billed customers \$99,286,711 to recover its estimated energy efficiency programs'  
14 costs for MEEIA Cycle III. For the same period, Ameren Missouri actually spent \$89,552,711  
15 on its energy efficiency programs. Thus, Ameren Missouri over-collected \$9,734,000 from its  
16 customers during the Review Period for MEEIA Cycle III Program Costs. The monthly  
17 amounts that are either over- or under-collected from customers are tracked in a regulatory asset  
18 account, along with monthly interest, until Ameren Missouri files for rate adjustments under its  
19 Rider EEIC and new energy efficiency investment rates are approved by the Commission. The  
20 interest associated with these over- or under-collected amounts is provided in Section V of this  
21 Report.

22           **2. Summary of Cost Implications**

23           If Ameren Missouri was imprudent in its tracking, reporting and/or calculating its  
24 estimated billed costs, ratepayer harm could result in an increase in future Energy Efficiency  
25 Investment Charge amounts.

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<sup>35</sup> Rate changes occurred during the Review Period in support of revisions to Rider EEIC – Energy Efficiency Investment Charge of Ameren Missouri's Schedule No. 6 – Schedule of Rates for Electric Service, 1<sup>st</sup> Revised Sheet No. 91.22 in Case No. ER-2019-0291, 2nd Revised Sheet No. 91.22 and Original Sheet No. 91.23 in Case No. ER-2020-0147, and 1st Revised Sheet No. 91.23 in Case No ER-2021-0158.

1                   **3. Conclusion**

2                   Staff found no indication that Ameren Missouri has acted imprudently regarding the  
3 calculation of the estimated billed program costs related to the cost recovery of its MEEIA  
4 program costs. The monthly amounts that were over- or under-collected from customers are  
5 tracked in a regulatory asset account, along with monthly interest, and will be reflected in a  
6 future Ameren Missouri rate adjustment filing under its Rider EEIC.

7                   **4. Documents Reviewed**

- 8                   a. Ameren Missouri’s *2016 – 2018 Energy Efficiency Plan*;
- 9                   b. Ameren Missouri’s *2019 – 2021 Energy Efficiency Plan*;
- 10                  c. Approved MEEIA Energy Efficiency and Demand Side Management  
11                   Programs Tariff Sheets;
- 12                  d. EEIC Rider Case Nos ER-2019-0291, ER-2020-0147, and ER-2021-0158;  
13                   and
- 14                  e. Staff Data Requests: 0001, 0002, 0003, 0005 and 0011.

15 *Staff Expert/Witness: Brooke Mastrogiannis and Cynthia M. Tandy*

16                   **F. Throughput Disincentive Costs Billed and Actual**

17                   **1. Description**

18                   For a utility that operates under a traditional regulated utility model, a “throughput  
19 incentive” is created when a utility’s increase in revenues is linked directly to its increase in  
20 sales. This relationship between revenues and sales creates a financial disincentive for the utility  
21 to engage in any activity that would decrease sales, such as utility sponsored energy efficiency  
22 programs. The TD allows the utility to recover its lost margin revenues associated with the  
23 successful implementation of the MEEIA programs.

24                   Ameren Missouri calculates TD monthly based upon all end use measures installed  
25 during the month and the savings associated with each installed measure. For Cycle 2, the TD  
26 calculation is prescribed in the Rider EEIC where  $TD = MS \times NMR \times NTGF$ <sup>36</sup>. Staff reviewed  
27 the various components of the TD calculation for the accuracy and proper timing of measure

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<sup>36</sup> Throughput Disincentive = Monthly Savings x Net Margin Revenue x Net to Gross Factor. Union Electric Company Rider EEIC MO P.S.C. Schedule No. 6, Original Sheet No. 91.6.

1 counts. TD is also billed to customers through the “Energy Efficiency Investment Charge” line  
2 item on the customers’ bill by combining net program cost with net throughput disincentive  
3 (\$/kWh) rates as prescribed in Ameren Missouri’s Rider EEIC. Cycle 2. TD is taken from each  
4 cumulative TD calculation file, so that any difference to previous months’ TD is captured in  
5 the current month’s over/under accounting if there was a correction made to a prior month.  
6 During the Review Period, Ameren Missouri billed customers \$43,874,327 for the Cycle 2  
7 estimated Company TD. The actual Company TD for Cycle 2 during the Review Period  
8 was \$43,071,333. Of this actual Company TD, \$435,274 was from the Long Lead TD, and  
9 \$42,636,059 was from the Non-Long Lead TD. The total cumulative TD for the entire Cycle 2  
10 period to date is \$89,671,272<sup>37</sup>. Thus, Ameren Missouri over-collected \$802,994 from its  
11 customers during the Review Period for Cycle 2 TD.

12 For Cycle 3, the TD calculation is prescribed in the Rider EEIC where  $TD = MS \times NMR$   
13  $\times NTGF$ <sup>38</sup>. Cycle 3 TD is taken from each cumulative TD calculation file as described above.  
14 In addition, TD is summarized separately for plan year 2019 and plan year 2020, and those two  
15 calculations are then combined. During the Review Period, Ameren Missouri billed customers  
16 \$10,336,784 for the Cycle 3 estimated Company TD. The actual company TD for Cycle 3  
17 during the Review Period and the total cumulative TD for the entire Cycle 3 period was  
18 \$12,802,594. Thus, Ameren Missouri under-collected \$2,465,810 from its customers during the  
19 Review Period for Cycle 3 TD.

20 As described in the TD calculation process above, at various times there are revisions  
21 made to past months’ TD. These revisions could reflect corrections to errors, updates to TD  
22 calculation methodology, updates to program year savings, etc. As requested, Ameren Missouri  
23 provided a monthly TD comparison file<sup>39</sup> to explain historical changes in detail for each TD  
24 cycle, including a description for each occurrence of revisions to the monthly TD from the  
25 previous month. With this TD calculation comparison file, Staff was able to reconcile the  
26 revisions made to past months’ TD to the total cumulative TD for Cycle 2 and Cycle 3.

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<sup>37</sup> This total cumulative TD includes Cycle 2 Non-Long Lead TD and Long Lead TD.

<sup>38</sup> Throughput Disincentive = Monthly Savings x Net Margin Revenue x Net to Gross Factor. Union Electric Company Rider EEIC MO P.S.C. Schedule No. 6, Original Sheet No. 91.17.

<sup>39</sup> Data Request 00015.4.

1                   **2. Summary of Cost Implications**

2                   If Ameren Missouri was imprudent in its tracking, reporting and/or calculating the  
3 Company’s estimated billed TD or actual TD cost, ratepayer harm could result in an increase  
4 in future Energy Efficiency Investment Charge amounts.

5                   **3. Conclusion**

6                   Staff found no indication that Ameren Missouri has acted imprudently regarding the  
7 calculation of the TD billed or the actual TD calculation related to the cost recovery of its  
8 MEEIA TD costs or recovery of those costs.

9                   **4. Documents Reviewed**

- 10                   a. Ameren Missouri’s 2016 – 2018 Energy Efficiency Plan;  
11                   b. Ameren Missouri’s 2019 – 2021 Energy Efficiency Plan;  
12                   c. Ameren Missouri’s MEEIA EEIC Rider, ER-2020-0147 and ER-2021-0158;  
13                   d. Approved MEEIA Energy Efficiency and Demand Side Management  
14                   Programs Tariff Sheets;  
15                   e. Ameren Missouri’s Quarterly Surveillance Reports;  
16                   f. Discussions with Ameren Missouri; and,  
17                   g. Staff Data Requests: 0001, 0005, 0015, 0015.1, 0015.3, 0015.4, 0015.5,  
18                   0017, 0017.2, 0017.3, 0017.4, and 0017.5.

19 *Staff Expert/Witness: Brooke Mastrogiannis*

20                   **G. Demand Response**

21                   **1. Description**

22                   The Business and Residential Demand Response Programs were new demand response  
23 programs starting in Ameren Missouri’s MEEIA 2019 – 2021 Plan. The purpose of the  
24 Business and Residential Demand Response Programs is to proactively impact customer energy  
25 use in such a way as to reduce demand and/or energy.<sup>40</sup> The program season for which demand  
26 response events may be called is May through September.

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<sup>40</sup> MO.P.S.C. Schedule No. 6 1<sup>st</sup> Revised Sheet No. 247

1 The Business Demand Response Program is operated by a demand response aggregator  
2 to obtain energy and demand reductions from existing facilities by incentivizing customers to  
3 reduce energy usage through direct load control, manual response, and/or the use of behind the  
4 meter assets such as energy management systems or other properly permitted dispatchable  
5 assets. Customers can receive a demand reduction incentive based on their average demand  
6 reduction during the events of the program season. Customers can also receive an energy  
7 reduction incentive based on the energy reduction for each event. The maximum number of  
8 events per program season is ten and the minimum number of events per program season is  
9 two.

10 The Residential Demand Response Program obtains energy and demand reductions  
11 from residences that have installed program-eligible devices by incentivizing them to allow the  
12 Program Administrator to control their device's operation during peak events for demand  
13 reduction and non-peak periods for energy reduction. Participants receive incentives for  
14 participating in the program, which may include upfront enrollment incentives, an annual  
15 incentive, and an installation incentive. The maximum number of events per program season  
16 is ten and the minimum number of events per program season is three with at least one event  
17 per program season dispatching all participants.

18 In response to Staff Data Request 0024, Ameren Missouri stated that for the Residential  
19 Demand Response Program, the program can call either a peak shaving event or a "test" event.  
20 Peak shaving events are triggered by Ameren Missouri when the forecasted day ahead peak  
21 demand exceeds 99% of the forecasted annual peak load. Test events are ideally called when  
22 the day-ahead temperature at the St. Louis Lambert International Airport is forecasted to  
23 equal or exceed 95 degrees Fahrenheit. The Business Demand Response Program is  
24 contractually bound to five emergency demand response events triggered per MISO MaxGen  
25 Event Stage 2 criteria and five peak shaving events when the day-ahead forecasted daily peak  
26 demand exceeds 99% of forecasted annual summer peak demand limited to two events across  
27 two consecutive days. Two "test" events are allowed in absence of emergency or peak events  
28 after August 15<sup>th</sup> and before September 30<sup>th</sup>.

29 In response to Staff Data Request 0025, Ameren Missouri stated that the Business  
30 Demand Response Program called two test events in each program season of each program year

1 (2019 and 2020), and the Residential Demand Response Program called a total of eight events,  
2 four in each program season of each program year.

### 3 **2. Summary of Cost Implications**

4 If Ameren Missouri was imprudent in its decisions to call demand response events,  
5 ratepayer harm could result in an increase in future Energy Efficiency Investment Charge  
6 amounts and Fuel and Adjustment Clause amounts.

### 7 **3. Conclusion**

8 Staff found no indication that Ameren Missouri acted imprudently in its decisions to  
9 call, or not to call, demand response events for this Review Period. Ameren Missouri's demand  
10 response programs are new to its MEEIA 2019 – 2021 Plan. Ameren Missouri has specific  
11 protocols in place for if, and when, it will call demand response events.

### 12 **4. Documents Reviewed**

- 13 a. Ameren Missouri's 2019 – 2021 Energy Efficiency Plan;
- 14 b. Approved MEEIA Energy Efficiency and Demand Side Management  
15 Programs Tariff Sheets;
- 16 c. Staff Data Requests: 0023, 0023.1, 0023.2, 0024, and 0025.

17 *Staff Expert/Witness: Jordan Hull*

## 18 **IV. GROSS ANNUAL ENERGY AND DEMAND SAVINGS (kWh and kW)**

### 19 **1. Description**

20 The purpose of Ameren Missouri's energy efficiency programs is for customers to use  
21 less energy and therefore everything else being equal reduces the need for more generation. In  
22 the 2019 Stipulation, Ameren Missouri planned for cumulative annual energy savings of  
23 991,127,000 kWh and demand savings of 496,850 kW<sup>41</sup> for MEEIA Cycle 3. In the 2016  
24 Stipulation, Ameren Missouri planned for cumulative annual energy savings of 570,980,000  
25 kWh and demand savings of 166,642 kW for MEEIA Cycle 2. However, for the Review Period,  
26 Ameren Missouri planned for no annual energy or demand savings for MEEIA Cycle 2, and it

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<sup>41</sup> These savings were updated on August 5, 2020. The 2019 Stipulation planned energy savings was 793,970,000 kWh and demand savings of 360,800 kW.



1 planned for cumulative annual energy savings of 432,690,768 kWh and demand savings of  
2 201,023 kW for MEEIA Cycle 3<sup>42</sup>. For the Review Period for MEEIA Cycle 3, Ameren  
3 Missouri reported actual gross energy and demand savings based upon installed measures of  
4 442,575,936 kWh and 237,358 kW, respectively. During the same Review Period for MEEIA  
5 Cycle 2, Ameren Missouri reported actual gross energy and demand savings based  
6 upon installed measures of 56,070,050 kWh and 23,209 kW, respectively. Ameren  
7 Missouri monetizes the actual energy savings through its TD calculation as discussed earlier.

8         Achieved cumulative deemed annual energy and demand savings relative to the planned  
9 cumulative annual energy and demand savings for the same period is important to  
10 understanding the overall performance of Ameren Missouri’s energy efficiency programs.  
11 Table 9A provides a comparison of achieved savings and planned savings for Ameren  
12 Missouri’s residential and business programs specifically for MEEIA Cycle 3 for the Review  
13 Period. If Ameren Missouri was unable to achieve its planned energy and demand savings  
14 levels, that could be an indication the programs were not being prudently administered by the  
15 implementers and by Ameren Missouri. The results in Table 9A<sup>43</sup> below indicate that Ameren  
16 Missouri exceeded its plan for cumulative deemed annual energy savings by 2%<sup>44</sup> during the  
17 Review Period of Ameren Missouri’s 2019-2021 Plan. Table 9B provides a comparison of  
18 achieved savings and planned savings for Ameren Missouri’s residential and business programs  
19 specifically for MEEIA Cycle 2 for the Review Period.

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28 *continued on next page*

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<sup>42</sup> Data Request No. 0009.

<sup>43</sup> Table 9 was created from Data Request No. 0017.

<sup>44</sup> This calculation derived from the total variance divided by the total planned energy savings (kWh).

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Table 9A

MEEIA 3						
Cumulative Totals March 1, 2019 through September 30, 2020						
MEEIA Programs	Achieved Annual Energy Savings (kWh)	Planned Annual Energy Savings (kWh)	Variance	Achieved Annual Demand Savings (kW)	Planned Annual Demand Savings (kW)	Variance
Appliance Recycling	2,523,946	6,309,328	(3,785,382)	398	906	(508)
Efficient Products	10,287,369	20,829,924	(10,542,555)	3,372	5,461	(2,089)
Energy Efficient Kits	8,454,630	12,738,107	(4,283,477)	1,626	2,254	(628)
Home Energy Report	22,509,950	35,250,000	(12,740,050)	10,491	16,429	(5,938)
HVAC	70,239,800	88,408,528	(18,168,728)	40,869	46,753	(5,884)
Lighting	138,361,428	35,168,270	103,193,158	20,821	5,249	15,572
Multifamily Income Eligible	3,025,182	2,137,500	887,682	511	949	(438)
Multifamily Market Rate	3,414,908	5,271,497	(1,856,589)	754	1,612	(858)
Res Demand Response	4,440,576	2,113,845	2,326,731	38,382	21,497	16,885
Single Family Income Eligible	3,288,799	7,180,953	(3,892,154)	1,408	2,219	(811)
Single Family Income Eligible- Grants	5,173,922	9,186,454	(4,012,532)	962	1,368	(406)
<b>Total Residential Programs</b>	<b>271,720,510</b>	<b>224,594,406</b>	<b>47,126,104</b>	<b>119,594</b>	<b>104,697</b>	<b>14,897</b>
Business Social Services	1,564,188	2,480,284	(916,096)	299	474	(175)
Custom	29,939,141	92,189,609	(62,250,468)	15,466	27,583	(12,117)
New Construction	5,033,224	10,472,161	(5,438,937)	1,183	2,779	(1,596)
Retro-Commissioning	2,151,572	8,608,056	(6,456,484)	1,198	3,157	(1,959)
Small Business Direct Install	10,088,879	17,330,645	(7,241,766)	1,924	3,001	(1,077)
Standard	122,024,374	76,140,607	45,883,767	23,787	15,582	8,205
Strategic Energy Management	-	-	-	-	-	-
Biz Demand Response	54,048	875,000	(820,952)	73,907	43,750	30,157
<b>Total Business Programs</b>	<b>170,855,426</b>	<b>208,096,362</b>	<b>(37,240,936)</b>	<b>117,764</b>	<b>96,326</b>	<b>21,438</b>
<b>Total Portfolio</b>	<b>442,575,936</b>	<b>432,690,768</b>	<b>9,885,168</b>	<b>237,358</b>	<b>201,023</b>	<b>36,335</b>

2

3

Table 9B

MEEIA 2						
Cumulative Totals March 1, 2019 through September 30, 2020						
MEEIA Programs	Achieved Annual Energy Savings (kWh)	Planned Annual Energy Savings (kWh)	Variance	Achieved Annual Demand Savings (kW)	Planned Annual Demand Savings (kW)	Variance
Lighting	55,829	-	55,829	8	-	8
Efficient Products	268,834	-	268,834	60	-	60
HVAC	4,751,989	-	4,751,989	2,766	-	2,766
Smart Thermostats	146,916	-	146,916	139	-	139
Low Income	18,883	-	18,883	8	-	8
EE Kits	-	-	-	-	-	-
Home Energy Reports	-	-	-	-	-	-
<b>Total Residential Programs</b>	<b>5,242,451</b>	<b>-</b>	<b>5,242,451</b>	<b>2,981</b>	<b>-</b>	<b>2,981</b>
Standard	14,490,871	-	14,490,871	2,705	-	2,705
Custom	21,374,386	-	21,374,386	12,129	-	12,129
Retro-Commissioning	1,832,299	-	1,832,299	1,235	-	1,235
New Construction	11,895,210	-	11,895,210	4,137	-	4,137
SBDI	85,258	-	85,258	16	-	16
Cust Ext Lighting	1,149,575	-	1,149,575	6	-	6
<b>Total Business Programs</b>	<b>50,827,599</b>	<b>-</b>	<b>50,827,599</b>	<b>20,228</b>	<b>-</b>	<b>20,228</b>
<b>Total Portfolio</b>	<b>56,070,050</b>	<b>-</b>	<b>56,070,050</b>	<b>23,209</b>	<b>-</b>	<b>23,209</b>

4

The results in table 10 below only represent the achieved annual energy and demand savings during this Review Period for MEEIA Cycle 2, since there are no planned annual energy and demand savings during this Review Period for Cycle 2. Table 10 is broken down by the achieved annual energy and demand savings for Cycle 2 Long Lead and Non-Long Lead during this Review Period.

**Table 10**

<b>MEEIA 2 Long-Lead and Non Long-Lead Totals</b>						
<b>Cumulative Totals March 1, 2019 through September 30, 2020</b>						
<b>MEEIA Programs</b>	<b>Long-Lead Achieved Annual Energy Savings (kWh)</b>	<b>Non-Long Lead Achieved Annual Energy Savings (kWh)</b>	<b>Total Achieved Annual Energy Savings (kWh)</b>	<b>Long-Lead Achieved Annual Demand Savings (kW)</b>	<b>Non Long-Lead Achieved Annual Demand Savings (kW)</b>	<b>Total Achieved Annual Demand Savings (kW)</b>
Lighting	-	55,829	55,829	-	8	8
Efficient Products	-	268,834	268,834	-	60	60
HVAC	-	4,751,989	4,751,989	-	2,766	2,766
Smart Thermostats	-	146,916	146,916	-	139	139
Low Income	-	18,883	18,883	-	8	8
EE Kits	-	-	-	-	-	-
Home Energy Reports	-	-	-	-	-	-
<b>Total Residential Programs</b>	<b>-</b>	<b>5,242,451</b>	<b>5,242,451</b>	<b>-</b>	<b>2,981</b>	<b>2,981</b>
Standard	5,283,486	9,207,385	14,490,871	1,003	1,702	2,705
Custom	4,326,372	17,048,014	21,374,386	1,964	10,165	12,129
Retro-Commissioning	1,245,261	587,038	1,832,299	775	460	1,235
New Construction	6,486,898	5,408,312	11,895,210	2,360	1,777	4,137
SBDI	-	85,258	85,258	-	16	16
Cust Ext Lighting	-	1,149,575	1,149,575	-	6	6
<b>Total Business Programs</b>	<b>17,342,017</b>	<b>33,485,582</b>	<b>50,827,599</b>	<b>6,102</b>	<b>14,126</b>	<b>20,228</b>
<b>Total Portfolio</b>	<b>17,342,017</b>	<b>38,728,033</b>	<b>56,070,050</b>	<b>6,102</b>	<b>17,107</b>	<b>23,209</b>

In Staff’s previous two MEEIA prudence reviews of Ameren Missouri’s MEEIA Cycle 2 Plan, Staff noted an issue with the reporting of these kWh values. As a result of the last MEEIA prudence review, Staff, Ameren Missouri and OPC agreed on the following language:

Ameren Missouri shall modify its process to eliminate timing differences between its sources for reporting information. The Company will implement processes so that retroactive adjustments are not made to the previous month’s results. If differences occur among the sources of reporting information, Ameren Missouri shall provide reconciliations to explain the nature of the differences among the sources of information.

Staff requested in Data Request No. 0017 that Ameren Missouri perform a detailed reconciliation in an effort to determine the most accurate determination of energy savings associated with the MEEIA Plan for the Review Period. Staff notes that the Company provided the following sources of information for the total energy savings (kWh): a reconciliation

1 provided in Data Request No. 0017, the tracking system reports (included with Data Request  
2 No. 0009)<sup>45</sup>, the TD calculation spreadsheets (included with Data Request No. 0015), and the  
3 Quarterly Surveillance Reports. The sources provided in Data Request 0017, the tracking  
4 system reports, and the TD calculation spreadsheets (with changes included in Data Request  
5 0015.4 incorporated) reconcile with each other. The Company explained that the Quarterly  
6 Surveillance Reports are based on a snapshot in time when the reports were created and are  
7 fluid documents due to savings adjustments that can be made to previous months.

8 The total of each separate Quarterly Surveillance Reports reflects a combined total of  
9 445,197,251 actual energy savings kWh for the period under review for MEEIA 3, whereas the  
10 other sources provided reflect a total of 442,575,936 actual energy savings kWh for the period.  
11 However the cumulative total from the Quarterly Surveillance reports reflects the same actual  
12 energy savings kWh for the Review Period as the other sources<sup>46</sup>. As described by Ameren  
13 Missouri, this is because the data revisions described in the TD section of this Report may not  
14 necessarily be reflected in the next Quarterly Surveillance Report, but instead are only reflected  
15 in the cumulative and year-end totals. The total of each separate Quarterly Surveillance report  
16 for MEEIA 2 reflects a combined total of 49,484,289 kWh for the period under review, whereas  
17 the other three sources provided reflect a total of 56,070,050 kWh. As stated above, the  
18 cumulative totals from the Quarterly Surveillance Reports reflect the most up to date revisions.  
19 The Company stated in response to a follow up Data Request that the correct amount and source  
20 for kWh is the 442,575,936 energy savings kWh for MEEIA 3, and 56,070,050 energy  
21 savings kWh for MEEIA 2. Staff was able to verify these amounts in the reconciliation provided  
22 in Data Request No. 0017, the tracking system reports (included with Data Request No. 0009),  
23 and the TD calculation spreadsheets (included with Data Request No. 0015) for MEEIA 2 and  
24 MEEIA 3 kWh.

## 25 **2. Summary of Cost Implications**

26 If Ameren Missouri was imprudent in its tracking, reporting and/or calculating the  
27 Company's estimated energy and demand savings ratepayer harm could result in an increase in  
28 future Energy Efficiency Investment Charge amounts.

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<sup>45</sup> Staff chose a sample of program measures and compared the kWh savings as reported in the Company details to the measure savings as reported in the TRM and subsequent updates to the TRM.

<sup>46</sup> See cumulative kWh total in Confidential Addendum D, page 7.

1                   **3. Conclusion**

2                   Staff found no indication that Ameren Missouri has acted imprudently regarding the  
3 calculation of the energy savings.

4                   **4. Documents Reviewed**

- 5                   a. Ameren Missouri’s *2016 – 2018 Energy Efficiency Plan* and Technical  
6                   Resource Manual;  
7                   b. Ameren Missouri’s *2019 – 2021 Energy Efficiency Plan* and Technical  
8                   Resource Manual;  
9                   c. Approved MEEIA Energy Efficiency and Demand Side Management  
10                   Programs Tariff Sheets;  
11                   d. Ameren Missouri’s Quarterly Surveillance Reports;  
12                   e. Staff Data Requests: 0001, 0002, 0015, 0015.1, 0015.3, 0015.4, 0015.5,  
13                   0017, 0017.2, 0017.3, 0017.4, and 0017.5; and,  
14                   f. Reports pulled from TRC and Franklin Energy’s database tracking system.

15 *Staff Expert/Witness: Brooke Mastrogiannis*

16                   **V. INTEREST**

17                   **1. Description**

18                   Staff reviewed the interest calculations for program costs and throughput disincentive,  
19 broken out by rate class, as provided in Ameren Missouri’s response to Data Request No. 0005  
20 for the Review Period of March 1, 2019 through September 30, 2020. Ameren Missouri’s tariff  
21 sheets provide that for program costs and TD: “Such amounts shall include monthly  
22 interest charged at the Company’s monthly short-term borrowing rate.” Staff verified the  
23 Company’s average monthly short-term borrowing rates were applied correctly to the over- or  
24 under-recovered balances for program costs and TD. Ameren Missouri calculates interest  
25 associated with TD by each rate class.

26                   During the Review Period Ameren Missouri’s total for the interest amount accrued for  
27 the Company’s program costs as reported on Ameren Missouri’s Quarterly Surveillance  
28 Monitoring Reports were as follows:

29                   **Table 11**

## INTEREST

	<b>For Review Period March 1, 2019 through September 30, 2020</b>	<b>(Over)/ Under Billed</b>	<b>Cumulative Interest</b>	<b>(Over)/ Under Billed</b>
MEEIA Cycle 2	\$ 17,131	Under	\$ 259,427	Over
MEEIA Cycle 3	\$ 8,977	Under	\$ 8,977	Under
TD Cycle 2	\$ 32,427	Over	\$ 23,021	Over
TD Cycle 3	\$ 11,098	Over	\$ 11,098	Over

### 2. Summary of Cost Implications

If Ameren Missouri was imprudent in its reporting and/or calculating of the interest associated with the over- or under-recovery of energy efficiency programs' costs and/or the TD, ratepayer harm could result in an increase in future Energy Efficiency Investment Charge amounts.

### 3. Conclusion

Staff found no indication that Ameren Missouri's interest calculations were incorrect and found them reasonable; therefore, Staff found no indication that Ameren Missouri acted imprudently regarding the calculation of the interest.

### 4. Documents Reviewed

- a. Ameren Missouri's Quarterly Surveillance Monitoring Reports for Review Period;
- b. Approved MEEIA Energy Efficiency and Demand Side Management Programs Tariff Sheets; and,
- c. Staff Data Requests: 0003, 0005 and 0010.

*Staff Expert/Witness: Cynthia M. Tandy*

1     **VI. EARNINGS OPPORTUNITY (EO)**

2             **1. Description**

3             Ameren Missouri’s EO is designed to provide a substitute for earnings lost on physical  
4 plant that was not built by Ameren Missouri because of the energy and demand savings  
5 achieved by Ameren Missouri’s MEEIA programs. The MEEIA 2019-2021 Plan includes  
6 annual targets, with EO payout amounts calculated for each Program Year. Ameren Missouri’s  
7 tariff sheet defines Earnings Opportunity Award Determination as:

8                     An Earnings Opportunity Award shall be calculated for each Program  
9 Year using the EO Calculator submitted with the MEEIA 2019-21 Plan  
10 as Appendix N. The Earnings Opportunity Award will not go below zero  
11 dollars (\$0). If Commission-approved new programs are added to the  
12 Program, the Company may seek Commission approval to have the  
13 targets and the cap of the Earnings Opportunity Award adjusted. For  
14 each Program Year the Earnings Opportunity Award shall be adjusted  
15 for the difference, with carrying cost at the Company’s monthly  
16 short-term interest rate, between TD revenues billed resulting from the  
17 application of the EEIR and what those revenues would have been if:  
18 1) the ME used in the calculation were the normalized savings for each  
19 Measure at customer meter per Measure determined through EM&V ex-  
20 post gross analysis for each Program Year, and 2) the NTGF used in the  
21 calculation was the net-to-gross values determined through EM&V.<sup>47</sup>

22 Staff reviewed the Cycle 2 and Cycle 3 EO from the calculations provided in response to Data  
23 Requests 0015.2 and the calculations in the EEIC Riders in dockets ER-2020-0147 and  
24 ER-2021-0158 for the months in this Review Period. During this review, Staff was able to  
25 verify that Ameren Missouri did not recover more than its approved EO for Cycle 2 and Cycle  
26 3. EO awarded for Cycle 3 Plan Year 1 during this Review Period was \$6,239,380.68. The  
27 Cycle 2 total EO awarded was \$43,584,506, with \$17,024,470 Cycle 2 EO recovered during  
28 this Review Period.

29             **2. Summary of Cost Implications**

30             If Ameren Missouri was imprudent in its reporting and/or calculation of the EO,  
31 ratepayer harm could result in an increase in future DSIM Charge amounts.

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<sup>47</sup> Original Tariff Sheet No. 91.21. Ameren Missouri’s previous tariff sheets that defines EO are attached to this report in Addendum’s A and B.

1                   **3. Conclusion**

2                   Staff has verified that Ameren Missouri has not recovered earnings opportunity in  
3 excess of the amounts awarded.

4                   **4. Documents Reviewed**

- 5                   a. Ameren Missouri’s *2016-2018 Energy Efficiency Plan*;
- 6                   b. Ameren Missouri’s *2019-2021 Energy Efficiency Plan*;
- 7                   c. Ameren Missouri Tariff Sheet 91.16 and 91.21;
- 8                   d. Ameren Missouri Cycle 3 Stipulation and Agreement; and,
- 9                   e. Staff Data Requests 0003, 0010, 0015, and 0015.2.

10 *Staff Expert/Witness: Lisa Wildhaber*

11                   **VII. EVALUATION MEASUREMENT AND VERIFICATION (EM&V)**

12                   **1. Description**

13                   In the MEEIA 2019-2021 Plan, Ameren Missouri agreed<sup>48</sup> to have its independent  
14 EM&V evaluator(s) perform annual EM&V and file annual EM&V reports with the  
15 Commission following each program year. During this Review Period, Ameren  
16 Missouri’s evaluators filed eighteen evaluation reports: nine for PY 2018, seven for PY 2019,  
17 and two for PY 2018 Long Lead Projects.<sup>49</sup> Ameren Missouri submitted the “PY 19 EM&V”  
18 report on June 22, 2020, on behalf of the independent evaluator. On August 5, 2020, the  
19 Commission issued its *Order Approving Stipulation and Agreements*, which approved  
20 the resolutions to the issues raised in the PY 19 EM&V report, as well as approving  
21 the implementation of MEEIA programs through Plan Year 2022. The cost of EM&V  
22 work performed by Ameren Missouri’s independent evaluator for the Review Period for  
23 Cycle 3 is \*\* \_\_\_\_\_ \*\*.

24                   Ameren Missouri contracted with Opinion Dynamics Corporation to be the evaluator  
25 for the Cycle 3 programs. Ameren Missouri holds back or retains 5% of the total amount of  
26 each invoice submitted by Opinion Dynamics. The 5% retainage will be payable after Opinion  
27 submits an acceptable and timely final annual report, unless issues are identified that result in

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<sup>48</sup> Stipulation and Agreement approved by the Commission on December 5, 2018, Paragraph 2 reference to the Revised Ameren Missouri’s 2019-21 Energy Efficiency Plan.

<sup>49</sup> The eighteen evaluation reports are provided in response to Data Request 0006.



1 forfeiture of the retainage amount. Therefore, only 95% of the invoices submitted are paid and  
2 reflected in the transactions that Staff reviewed. Staff requested from Ameren Missouri copies  
3 of the EM&V evaluators' invoices. EM&V invoices submitted by Ameren Missouri reflected  
4 the entire 100% invoice total, including the 5% retainage portion. Staff was able to verify  
5 the recording of invoices at 95% of the total invoiced amount in the responses provided to  
6 Data Request No. 0003 and No. 0008.

7 Staff reviewed invoices related to the Cycle 2 non-long lead EM&V costs. Ameren  
8 Missouri held back or retained 10% of the invoices submitted by Cadmus and ADM Associates,  
9 Inc. ("ADM"). Staff verified that the invoices were paid and recorded at 90%, allowing for the  
10 10% portion that was retained.<sup>50</sup>

11 Ameren Missouri contracted with ADM to perform impact measurement and  
12 verification ("IM&V") of the MEEIA Cycle 2 Long Lead Projects and to provide the results in  
13 two annual reports. The first annual report was submitted in May 2020, for the period of March  
14 2019 through February 2020. The cost of IM&V work performed by ADM for the Review  
15 Period for Cycle 2 Long Lead Projects is \$5,953.75.

16 Commission rules allow Ameren Missouri to spend up to 5% of its total program costs  
17 budget for EM&V.<sup>51</sup> During the Review Period, Ameren Missouri expended \$881,937 for  
18 Cycle 2 non-long lead EM&V. This amount, combined with the \$5,753,926 EM&V Cycle 2  
19 cumulative costs reported previously, amounts to \$6,635,863 or 4.19% of the \$158,180,000  
20 total Cycle 2 budget for program costs. Thus, the costs associated with the Cycle 2 EM&V costs  
21 did not exceed the 5% maximum cap. During the Review Period, Ameren Missouri expended  
22 \*\* \_\_\_\_\_ \*\* for Cycle 3 EM&V, which represents \*\* \_\_\_\_\_ \*\*  
23 total Cycle 3 budget for programs' costs. Thus, the costs associated with the Cycle 3 EM&V  
24 costs did not exceed the 5% maximum cap. Staff will continue to monitor EM&V costs  
25 throughout the life of Cycle 3, to ensure Ameren Missouri does not exceed the 5% maximum  
26 cap of the total Cycle 3 budget.

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<sup>50</sup> Retainage on the Cycle 2 EM&V invoices was 10%, while retained on Cycle 3 EM&V invoices was 5%.

<sup>51</sup> 20 CSR 4240-20.093(8)(A) Each utility's EM&V budget shall not exceed five percent (5%) of the utility's total budget for all approved demand-side program costs.

1                   **2. Summary of Cost Implications**

2                   If Ameren Missouri was imprudent in administration of its EM&V contracts, ratepayer  
3 harm could result in an increase in future Energy Efficiency Investment Charge amounts.

4                   **3. Conclusion**

5                   Staff found no indication that Ameren Missouri acted imprudently regarding the  
6 administration of EM&V contracts concerning its Cycle 3 EM&V for the review period.

7                   **4. Documents Reviewed**

- 8                   a. Ameren Missouri’s *2016-2018 Energy Efficiency Plan*;
- 9                   b. Ameren Missouri’s *2019-2021 Energy Efficiency Plan*;
- 10                  c. Ameren Missouri Cycle 3 Stipulation and Agreement, EO-2018-0211;
- 11                  d. Approved MEEIA Energy Efficiency and Demand Side Management  
12                  Programs Tariff Sheets;
- 13                  e. Staff Report, Case No. EO-2019-0376, Second Prudence Review of Cycle 2  
14                  of Costs Related to the Demand-Side Programs Investment Mechanism;
- 15                  f. Opinion Dynamics invoices;
- 16                  g. ADM invoices; and,
- 17                  h. Staff Data Requests: 0002, 0003, 0006, 0007, 0008, 0008.1, 0008.2 and  
18                  0010.

19                  *Staff Expert/Witness: Lisa Wildhaber*

20                  *See attached Addendums A and B and Confidential Addendums C and D*

**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 ) Case No. EO-2021-0157  
(MEEIA) Cycle 3 Energy Efficiency Programs )  
and Cycle 2 Long-Lead Projects of Union )  
Electric Company d/b/a Ameren Missouri )

**AFFIDAVIT OF JORDAN HULL, BROOKE MASTROGIANNIS,  
CYNTHIA M. TANDY, LISA WILDHABER**

STATE OF MISSOURI       )  
  )  
COUNTY OF COLE        )  
  )        ss.

**COME NOW** Jordan Hull, Brooke Mastrogiannis, Cynthia M. Tandy, Lisa Wildhaber, and on their oath declares that they are of sound mind and lawful age; that they contributed to the foregoing *Direct Report*; and that the same is true and correct according to their best knowledge and belief, under penalty of perjury.

Further the Affiants sayeth not.

*/s/ Jordan Hull* \_\_\_\_\_  
Jordan Hull

*/s/ Brooke Mastrogiannis* \_\_\_\_\_  
Brooke Mastrogiannis

*/s/ Cynthia M. Tandy* \_\_\_\_\_  
Cynthia M. Tandy

*/s/ Lisa Wildhaber* \_\_\_\_\_  
Lisa Wildhaber

MO.P.S.C. SCHEDULE NO. 6 2nd Revised SHEET NO. 91CANCELLING MO.P.S.C. SCHEDULE NO. 6 1st Revised SHEET NO. 91APPLYING TO MISSOURI SERVICE AREA

**RIDER EEIC**  
**ENERGY EFFICIENCY INVESTMENT CHARGE**  
**For MEEIA Cycle 2 Plan**

**APPLICABILITY**

This Rider EEIC - Energy Efficiency Investment Charge (Rider EEIC ) is applicable to all kilowatt-hours (kWh) of energy supplied to customers served under Company's Service Classification Nos. 1(M), 2(M), 3(M), 4(M), 11(M), and 12(M), excluding kWh of energy supplied to "opt-out" or "low-income" customers.

An Ameren Missouri low-income customer who has received assistance from Missouri Energy Assistance (a.k.a. Low Income Home Energy Assistance Program or LIHEAP), Winter Energy Crisis Intervention Program, or Summer Energy Crisis Intervention Program and (i) whose account has not automatically been exempted from Rider EEIC, or (ii) who has been charged Rider EEIC charges and whose account has not been credited for said charges, may provide the Company, via facsimile to **866.297.8054**, via email to [myhomeamerenmissouri@ameren.com](mailto:myhomeamerenmissouri@ameren.com), or via regular mail to **Ameren Missouri, P.O. Box 790098, St. Louis, MO 63179-0098**

- a. documentation of the assistance received in the form of:
  - i. a copy of the Division of Social Services Family Support Division ("DSSFSD") form EA-7 energy assistance payment notice received by the low-income customer, or
  - ii. a copy of the DSSFSD LIHEAP Energy Assistance direct payment check received by the low-income customer, or
  - iii. a copy of the Contract Agency energy crisis intervention program ("ECIP") payment notification letter received by the low-income customer, or
  - iv. a printout of the low-income customer's DSSFSD LIHEAP EA EIRG System Registration screen identifying the supplier, benefit amount and payment processing date.
- b. Upon receipt of the documentation, the Company will credit the low-income customer's account for:
  - i. energy efficiency investment charges, and
  - ii. any municipal charges attributable to said EEIC charges, that were previously charged to the low-income customer within twelve billing months following the documented receipt of energy assistance; provided that the low-income customer shall not be entitled to any credit, nor shall Company credit the low-income customer, for energy efficiency investment charges and associated municipal charges incurred and billed prior to the June 2015 commencement of the low-income exemption.
- c. Upon receipt of the documentation, for the remainder of the twelve months following the documented receipt of energy assistance, the Company will exempt such low-income customer from any Rider EEIC charges thereafter imposed. The exemption will be evidenced on the low-income customer's bill as an EEIC charge, followed by a credit.

Charges passed through this Rider EEIC reflect the charges approved to be billed from the implementation of the Missouri Energy Efficiency Investment Act (MEEIA) 2016-18 Plan and any remaining unrecovered balances from the MEEIA 2013-15 plan. Those charges include

FILED  
Missouri Public  
Service Commission  
JE-2020-0023

DATE OF ISSUE August 2, 2019 DATE EFFECTIVE September 1, 2019ISSUED BY Michael Moehn President St. Louis, Missouri  
NAME OF OFFICER TITLE ADDRESS

MO.P.S.C. SCHEDULE NO. 6 1st Revised SHEET NO. 91CANCELLING MO.P.S.C. SCHEDULE NO. 6 Original SHEET NO. 91APPLYING TO MISSOURI SERVICE AREA

**RIDER EEIC**  
**ENERGY EFFICIENCY INVESTMENT CHARGE**  
**For MEEIA Cycle 2 Plan**

**APPLICABILITY**

This Rider EEIC - Energy Efficiency Investment Charge (Rider EEIC ) is applicable to all kilowatt-hours (kWh) of energy supplied to customers served under Company's Service Classification Nos. 1(M), 2(M), 3(M), 4(M), 11(M), and 12(M), excluding kWh of energy supplied to "opt-out" or "low-income" customers.

An Ameren Missouri low-income customer who has received assistance from Missouri Energy Assistance (a.k.a. Low Income Home Energy Assistance Program or LIHEAP), Winter Energy Crisis Intervention Program, or Summer Energy Crisis Intervention Program and (i) whose account has not automatically been exempted from Rider EEIC, or (ii) who has been charged Rider EEIC charges and whose account has not been credited for said charges, may provide the Company, via facsimile to **866.297.8054**, via email to [myhomeamerenmissouri@ameren.com](mailto:myhomeamerenmissouri@ameren.com), or via regular mail to **Ameren Missouri, P.O. Box 790352, St. Louis, MO 63179-0352**

- a. documentation of the assistance received in the form of:
  - i. a copy of the Division of Social Services Family Support Division ("DSSFSD") form EA-7 energy assistance payment notice received by the low-income customer, or
  - ii. a copy of the DSSFSD LIHEAP Energy Assistance direct payment check received by the low-income customer, or
  - iii. a copy of the Contract Agency energy crisis intervention program ("ECIP") payment notification letter received by the low-income customer, or
  - iv. a printout of the low-income customer's DSSFSD LIHEAP EA EIRG System Registration screen identifying the supplier, benefit amount and payment processing date.
- b. Upon receipt of the documentation, the Company will credit the low-income customer's account for:
  - i. energy efficiency investment charges, and
  - ii. any municipal charges attributable to said EEIC charges, that were previously charged to the low-income customer within twelve billing months following the documented receipt of energy assistance; provided that the low-income customer shall not be entitled to any credit, nor shall Company credit the low-income customer, for energy efficiency investment charges and associated municipal charges incurred and billed prior to the June 2015 commencement of the low-income exemption.
- c. Upon receipt of the documentation, for the remainder of the twelve months following the documented receipt of energy assistance, the Company will exempt such low-income customer from any Rider EEIC charges thereafter imposed. The exemption will be evidenced on the low-income customer's bill as an EEIC charge, followed by a credit.

Charges passed through this Rider EEIC reflect the charges approved to be billed from the implementation of the Missouri Energy Efficiency Investment Act (MEEIA) 2016-18 Plan and any remaining unrecovered balances from the MEEIA 2013-15 plan. Those charges include:

FILED  
Missouri Public  
Service Commission  
EO-2015-0055; YE-2016-0198

DATE OF ISSUE	<u>February 5, 2016</u>	DATE EFFECTIVE	<u>March 6, 2016</u>
ISSUED BY	<u>Michael Moehn</u>	<u>President</u>	<u>St. Louis, Missouri</u>
	NAME OF OFFICER	TITLE	ADDRESS

CANCELLED  
September 1, 2019  
Missouri Public  
Service Commission  
JE-2020-0023

MO.P.S.C. SCHEDULE NO. 6 2nd Revised SHEET NO. 91.1CANCELLING MO.P.S.C. SCHEDULE NO. 6 1st Revised SHEET NO. 91.1APPLYING TO MISSOURI SERVICE AREA

**RIDER EEIC**  
**ENERGY EFFICIENCY INVESTMENT CHARGE (Cont'd.)**  
**For MEEIA Cycle 2 Plan**

**APPLICABILITY (Cont'd.)**

- 1) Program Costs, Company's Throughput Disincentive ((TD) and Earnings Opportunity (EO) Award (if any) for each Effective Period (EP)
- 2) Reconciliations, with interest, to true-up for differences between the revenues billed under this Rider EEIC and total actual monthly amounts for:
  - i) Program Costs incurred in the MEEIA 2016-18 Plan, including those related to Long-Lead Projects, and/or remaining unrecovered Program balances for MEEIA 2013-15,
  - ii) Company's TD incurred in the MEEIA 2016-18 Plan, including those related to Long-Lead Projects, and/or remaining TD-NSB Share balances for MEEIA 2013-15,
  - iii) Amortization of Earnings Opportunity ordered by the Missouri Public Service Commission (Commission), including those related to Long-Lead Projects, and/or remaining balances for the MEEIA 2013-15 Performance Incentive.
- 3) Any Ordered Adjustments.

Charges under this Rider EEIC shall continue after the anticipated February 28, 2019 end of MEEIA 2016-18 Plan until such time as the charges described in items 1), 2), and 3) above have been billed.

Charges arising from the MEEIA 2016-18 Plan that are the subject of this Rider EEIC shall be reflected in one "Energy Efficiency Invest Chg" on customers' bills in combination with any charges arising from a rider that is applicable to the MEEIA 2013-15 Plan demand-side management programs.

**DEFINITIONS**

As used in this Rider EEIC, the following definitions shall apply:

"AFUDC" means the Allowance for Funds Used During Construction rate computed in accordance with the formula prescribed in the Code of Federal Regulations Title 18 Part 101.

"Company's Throughput Disincentive" (TD) means to represent the utility's lost margins associated with the successful implementation of MEEIA programs. The detailed method for calculating the TD is described in Tariff Sheets 91.6 - 91.8.

"Earnings Opportunity" (EO) means the amount ordered by the Commission based on actual performance verified through Evaluation Measurement & Verification (EM&V) against planned targets. The details of determining EO are described herein.

- \* "Effective Period" (EP) means the twelve (12) months beginning with February and ending with January. Where an additional Rider EEIC filing is made to change the EEIR components during a calendar year, the EP for such a filing shall begin with the month of June or October and end the subsequent January.

"End Use Category" means the unique summary category of end-use load shapes. The list of End Use Categories is included in Appendix E to the Stipulation.

\*Indicates Change.

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Missouri Public  
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~~January 21, 2020~~ISSUED BY Michael Moehn President St. Louis, Missouri  
NAME OF OFFICER TITLE ADDRESS

MO.P.S.C. SCHEDULE NO. 6 1st Revised SHEET NO. 91.1  
 CANCELLING MO.P.S.C. SCHEDULE NO. 6 Original SHEET NO. 91.1

APPLYING TO MISSOURI SERVICE AREA

RIDER EEIC  
ENERGY EFFICIENCY INVESTMENT CHARGE (Cont'd.)  
For MEEIA Cycle 2 Plan

APPLICABILITY (Cont'd.)

- 1) Program Costs, Company's Throughput Disincentive ((TD) and Earnings Opportunity (EO) Award (if any) for each Effective Period (EP)
- \* 2) Reconciliations, with interest, to true-up for differences between the revenues billed under this Rider EEIC and total actual monthly amounts for:
  - i) Program Costs incurred in the MEEIA 2016-18 Plan, including those related to Long-Lead Projects, and/or remaining unrecovered Program balances for MEEIA 2013-15,
  - ii) Company's TD incurred in the MEEIA 2016-18 Plan, including those related to Long-Lead Projects, and/or remaining TD-NSB Share balances for MEEIA 2013-15,
  - iii) Amortization of Earnings Opportunity ordered by the Missouri Public Service Commission (Commission), including those related to Long-Lead Projects, and/or remaining balances for the MEEIA 2013-15 Performance Incentive.
- 3) Any Ordered Adjustments.

Charges under this Rider EEIC shall continue after the anticipated February 28, 2019 end of MEEIA 2016-18 Plan until such time as the charges described in items 1), 2), and 3) above have been billed.

Charges arising from the MEEIA 2016-18 Plan that are the subject of this Rider EEIC shall be reflected in one "Energy Efficiency Invest Chg" on customers' bills in combination with any charges arising from a rider that is applicable to the MEEIA 2013-15 Plan demand-side management programs.

DEFINITIONS

As used in this Rider EEIC, the following definitions shall apply:

"AFUDC" means the Allowance for Funds Used During Construction rate computed in accordance with the formula prescribed in the Code of Federal Regulations Title 18 Part 101.

"Company's Throughput Disincentive" (TD) means to represent the utility's lost margins associated with the successful implementation of MEEIA programs. The detailed method for calculating the TD is described in Tariff Sheets 91.6 - 91.8.

"Earnings Opportunity" (EO) means the amount ordered by the Commission based on actual performance verified through Evaluation Measurement & Verification (EM&V) against planned targets. The details of determining EO are described herein.

"Effective Period" (EP) means the twelve (12) billing months beginning with the February billing month and ending with the January billing month. Where an additional Rider EEIC filing is made to change the EEIR components during a calendar year, the EP for such a filing shall begin with the June or October billing month and end with the subsequent January billing month.

\* "End Use Category" means the unique summary category of end-use load shapes. The list of End Use Categories is included in Appendix E to the Stipulation.

\*Indicates Change.

FILED  
 Missouri Public  
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 EO-2015-0055; YE-2017-0275

CANCELLED  
 February 1, 2020  
 Missouri Public  
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DATE OF ISSUE June 29, 2017 DATE EFFECTIVE July 29, 2017  
 ISSUED BY Michael Moehn President St. Louis, Missouri  
 NAME OF OFFICER TITLE ADDRESS

MO.P.S.C. SCHEDULE NO. 6 2nd Revised SHEET NO. 91.2CANCELLING MO.P.S.C. SCHEDULE NO. 6 1st Revised SHEET NO. 91.2APPLYING TO MISSOURI SERVICE AREARIDER EEICENERGY EFFICIENCY INVESTMENT CHARGE (Cont'd.)For MEEIA Cycle 2 PlanDEFINITIONS (Cont'd.)

\* "Evaluation Measurement & Verification" (EM&V) means the performance of studies and activities intended to evaluate the process of the Company's program delivery and oversight and to estimate and/or verify the estimated actual energy and demand savings, cost effectiveness, and other effects from demand-side programs.

"Impact Measurement & Verification" (IM&V) means the determination of ex-post net energy and demand savings for Long-Lead Projects through application of a net-to-gross ratio, but does not include a cost-effectiveness analysis.

"Incentive" means any consideration provided by the Company, including, but not limited to, buy downs, markdowns, rebates, bill credits, payments to third parties, direct installation, giveaways, and education, which encourages the adoption of program measures.

\*\* "Long-Lead Program Costs" means incentive payments made to customers, contract payments made to program administrators, and costs for IM&V. There will be no portfolio-level costs allocated to long-lead projects.

\*\* "Long-Lead Project" means a project committed by a Customer, accepted by the Company, and submitted a signed commitment offer to the program administrator by January 31, 2019, according to the terms and implementation of the MEEIA 2016-2018 Energy Efficiency Plan that will require until a date after February 28, 2019, but no later than January 31, 2021, to certify completion.

"Low-Income" customers means those Service Classification 1(M)-Residential customers eligible for the low income exemption provisions contained in Section 393.1075.6, RSMo. As approved in File No. ER-2014-0258, customers eligible under this definition will be exempt from Rider EEIC charges for 12 billing months following assistance received from either Missouri Energy Assistance (a.k.a. Low Income Home Energy Assistance Program or LIHEAP), Winter Energy Crisis Intervention Program, Summer Energy Crisis Intervention Program, the Company's Keeping Current Low Income Pilot Program, and/or the Company's Keeping Cool Low Income Pilot Program.

"Measure" means energy efficiency measures described for each program attached as Appendix B to the Stipulation.

"MEEIA 2013-15 Plan" means Company's "2013-15 Energy Efficiency Plan" submitted in File No. EO-2012-0142 and its corresponding tariff sheets.

"MEEIA 2016-18 Plan" means Company's "2016-18 Energy Efficiency Plan" submitted in File No. EO-2015-0055 and modified by the Stipulation.

"Programs" means MEEIA 2016-18 programs listed in tariff sheet no. 174.

"Program Costs" means any prudently incurred program expenditures, including such items as program planning, program design, administration, delivery, end-use measures and incentive payments, advertising expense, evaluation, measurement and verification, market potential studies and work on a utility and/or statewide Technical Resource Manual (TRM).

"TRM" means the Company's Technical Resource Manual (attached as Appendix F to the Stipulation) and updated based on EM&V ex-post gross adjustments determined for Year 1 no later than twenty-four (24) months after commencement of MEEIA 2016-18.

"Stipulation" means the Stipulation and Agreement approved by the Commission in File No. EO-2015-0055, as it may be amended further by subsequent Commission orders.

\*Indicates Reissue. \*\*Indicates Addition.

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Missouri Public  
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MO.P.S.C. SCHEDULE NO. 6 Original SHEET NO. 91.3

CANCELLING MO.P.S.C. SCHEDULE NO. \_\_\_\_\_ SHEET NO. \_\_\_\_\_

APPLYING TO MISSOURI SERVICE AREA

RIDER EEIC  
ENERGY EFFICIENCY INVESTMENT CHARGE (Cont'd.)  
For MEEIA Cycle 2 Plan

ENERGY EFFICIENCY INVESTMENT RATE (EEIR) DETERMINATION

The EEIR during each applicable EP is a dollar per kWh rate for each applicable Service Classification calculated as follows:

$$EEIR = [NPC + NTD + NEO + NOA]/PE$$

Where:

NPC = Net Program Costs for the applicable EP as defined below,

$$NPC = PPC + PCR$$

PPC = Projected Program Costs is an amount equal to Program Costs projected by the Company to be incurred during the applicable EP.

PCR = Program Costs Reconciliation is equal to the cumulative difference, if any, between the PPC revenues billed resulting from the application of the NPC component of the EEIR and the actual Program Costs incurred through the end of the previous EP (which will reflect projections through the end of the previous EP due to timing of adjustments). Such amounts shall include monthly interest charged at the Company's monthly short-term borrowing rate. Any remaining PCR balance from MEEIA Cycle 1 shall be rolled into the PCR calculation starting February 2017.

NTD = Net Throughput Disincentive for the applicable EP as defined below,

$$NTD = PTD + TDR$$

PTD = Projected Throughput Disincentive is the Company's TD projected by the Company to be incurred during the applicable EP. For the detailed method for calculating the TD, see Sheet 91.6.

TDR = Throughput Disincentive Reconciliation is equal to the cumulative difference, if any, between the PTD revenues billed during the previous EP resulting from the application of the NTD component of the EEIR and the Company's TD through the end of the previous EP (which will reflect projections through the end of the previous EP due to timing of adjustments). Such amounts shall include monthly interest charged at the Company's monthly short-term borrowing rate. Any remaining TDR balance from MEEIA Cycle 1 shall be rolled into the TDR calculation starting February 2017.

NEO = Net Earnings Opportunity for the applicable EP as defined below,

$$NEO = EO + EOR$$

EO = Earnings Opportunity is equal to the Earnings Opportunity Award monthly amortization multiplied by the number of billing months in the applicable EP.

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NAME OF OFFICER TITLE ADDRESS

MO.P.S.C. SCHEDULE NO. 6 Original SHEET NO. 91.4

CANCELLING MO.P.S.C. SCHEDULE NO. \_\_\_\_\_ SHEET NO. \_\_\_\_\_

APPLYING TO MISSOURI SERVICE AREA

RIDER EEIC  
ENERGY EFFICIENCY INVESTMENT CHARGE (Cont'd.)  
For MEEIA Cycle 2 Plan

EEIR DETERMINATION (Cont'd.)

The monthly amortization shall be determined by dividing the Earnings Opportunity Award by the number of available billing months between the first billing month of the first EEIR filing after the determination of the Earnings Opportunity Award and 24 calendar months following the end of the annual period in which the Earnings Opportunity Award is determined.

The number of applicable billing months in the EP shall be the number of applicable billing months less the number of months including Earnings Opportunity Award amortization from previous EPs.

EOR = Earnings Opportunity Reconciliation is equal to the cumulative difference, if any, between the EO revenues billed resulting from the application of the NEO+NPI component of the EEIR and the monthly amortization of the Performance Incentive Award through the end of the previous EP (which will reflect projections through the end of the previous EP due to timing of adjustments). Such amounts shall include monthly interest charged at the Company's monthly short-term borrowing rate. Any remaining PIR balance from MEEIA Cycle 1 shall be rolled into the EOR calculation starting February 2019.

NOA = Net Ordered Adjustment for the applicable EP as defined below,

$$\text{NOA} = \text{OA} + \text{OAR}$$

OA = Ordered Adjustment is the amount of any adjustment to the Rider EEIC ordered by the Commission as a result of prudence reviews and/or corrections under this Rider EEIC. Such amounts shall include monthly interest at the Company's monthly short-term borrowing rate.

OAR = Ordered Adjustment Reconciliation is equal to the cumulative difference, if any, between the OA revenues billed resulting from the application of the EEIR and the actual OA ordered by the Commission through the end of the previous EP (which will reflect projections through the end of the previous EP due to timing of adjustments). Such amounts shall include monthly interest charged at the Company's monthly short-term borrowing rate.

PE = Projected Energy, in kWh, forecasted to be delivered to the customers to which the Rider EEIC applies during the applicable EP.

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Service Commission  
EO-2015-0055; YE-2016-0198

DATE OF ISSUE February 5, 2016 DATE EFFECTIVE March 6, 2016ISSUED BY Michael Moehn President St. Louis, Missouri  
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MO.P.S.C. SCHEDULE NO. 6

Original

SHEET NO. 91.5

CANCELLING MO.P.S.C. SCHEDULE NO. \_\_\_\_\_

SHEET NO. \_\_\_\_\_

APPLYING TO MISSOURI SERVICE AREA

RIDER EEIC  
ENERGY EFFICIENCY INVESTMENT CHARGE (Cont'd.)  
For MEEIA Cycle 2 Plan

EEIR DETERMINATION (Cont'd.)

The EEIR components and Total EEIR applicable to the individual Service Classifications shall be rounded to the nearest \$0.000001.

Allocations of charges for each applicable Service Classification for the MEEIA 2016-18 Plan will be made in accordance with the Stipulation and Agreement in File No. EO-2015-0055, Company's MEEIA 2016-18 Plan.

This Rider EEIC shall not be applicable to customers that have satisfied the opt-out provisions contained in Section 393.1075.7, RSMo or the low-income exemption provisions described herein.

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DATE OF ISSUE February 5, 2016 DATE EFFECTIVE March 6, 2016

ISSUED BY Michael Moehn President St. Louis, Missouri  
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MO.P.S.C. SCHEDULE NO. 6

Original

SHEET NO. 91.6

CANCELLING MO.P.S.C. SCHEDULE NO. \_\_\_\_\_

SHEET NO. \_\_\_\_\_

APPLYING TO MISSOURI SERVICE AREA

RIDER EEIC  
ENERGY EFFICIENCY INVESTMENT CHARGE (Cont'd.)  
For MEEIA Cycle 2 Plan

**TD DETERMINATION**

Monthly TD is the sum of the TD calculation for all End Use Categories applicable to Service Classifications as set out in the Availability section herein.

The TD for each End Use Category shall be determined by the following formula:

$$TD = MS \times NMR \times NTGF$$

Where:

- TD = Throughput Disincentive, in dollars, to be collected for a given month, for a given Service Classification.
- MS = Monthly Savings, is the sum of all programs' monthly savings, in kWh, for a given month, for a given Service Classification. The MS for each End Use Category shall be determined by the following formula:

$$MS = ((MAS_{CM} / 2) + CAS_{PM} - RB) \times LS$$

Where:

MAS<sub>CM</sub> = The sum of (MC x ME) for all measures in a program in the current calendar month.

MC = Measure Count. MC for a given month, for a given Service Classification, for each measure, is the number of each measure installed in the current calendar month. For the Home Energy Report program, the number of reports mailed during the current calendar month shall be used as the Measure Count.

ME = Measure Energy. ME will be determined as follows, for each Measure:

- a. Prior to finalization of EM&V for MEEIA 2016-18 Plan, Year 1 programs, for Measures not listed under those programs listed in (c) below, the ME is the annual total of normalized savings for each measure at customer meter per measure defined in the Company's Technical Resource Manual (TRM).
- b. After finalization of EM&V for MEEIA 2016-18 Plan, Year 1 programs, for Measures not listed under those programs listed in (c) below, the ME is the annual total of normalized savings for each measure at customer meter per measure defined in the updated TRM (which will be updated based on EM&V ex-post gross adjustments determined for Year 1 no later than 24 months after the commencement of MEEIA 2016-18 Plan).

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ISSUED BY Michael Moehn President St. Louis, Missouri  
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MO.P.S.C. SCHEDULE NO. 6 2nd Revised SHEET NO. 91.7  
 CANCELLING MO.P.S.C. SCHEDULE NO. 6 1st Revised SHEET NO. 91.7

APPLYING TO MISSOURI SERVICE AREA

**RIDER EEIC**  
**ENERGY EFFICIENCY INVESTMENT CHARGE (Cont'd.)**  
**For MEEIA Cycle 2 Plan**

**TD DETERMINATION (Cont'd.)**

a. For Measures under the -Business Custom Incentive Program, Business New Construction Incentive Program, and Business Retro-Commissioning Program, the ME will be the annual value attributable to the installations reported monthly by the program implementer.

CM = Current calendar month.

CAS = Cumulative sum of MAS of all prior calendar months for each End Use Category for the MEEIA 2016-18 Plan.

PM = Prior calendar month.

RB = Rebasing Adjustment. The RB shall equal the CAS applicable as of the date used for MEEIA normalization when base rates are adjusted in any general electric rate case or otherwise resulting in new retail electric rates becoming effective during the accrual and collection of TD pursuant to this MEEIA 2016-18 Plan. In the event base rates are adjusted by more than one general electric rate case or otherwise resulting in new rates becoming effective during the accrual and collection of TD pursuant to this MEEIA 2016-18 Plan occurs, the RB adjustment shall include each and every prior RB adjustment calculation.

LS = Load Shape. The LS is the monthly load shape percent (%) for each End-Use Category (attached as Appendix E to the Stipulation).

\*NMR = Net Margin Revenue. NMR values for each applicable Service Classification are as follows:

Month	Service Classifications				
	1 (M) Res \$/kWh	2 (M) SGS \$/kWh	3 (M) LGS \$/kWh	4 (M) SPS \$/kWh	11 (M) LPS \$/kWh
January	0.041430	0.045700	0.034588	0.035639	0.028725
February	0.042148	0.045551	0.035551	0.036287	0.031331
March	0.044040	0.048054	0.036561	0.036895	0.030147
April	0.045920	0.050473	0.037263	0.036579	0.030010
May	0.048148	0.052224	0.038191	0.038374	0.031032
June	0.103081	0.089681	0.077969	0.078589	0.056455
July	0.103081	0.089681	0.076643	0.077954	0.058907
August	0.103081	0.089681	0.076994	0.078763	0.057650
September	0.103081	0.089681	0.077319	0.078028	0.058389
October	0.045144	0.050437	0.037248	0.037245	0.031531
November	0.048189	0.051888	0.037606	0.037399	0.031034
December	0.043856	0.048895	0.035990	0.036578	0.029560

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 Service Commission  
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\* Indicates Change.

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 CANCELLING MO.P.S.C. SCHEDULE NO. 6 Original SHEET NO. 91.8

APPLYING TO MISSOURI SERVICE AREA

RIDER EEIC  
ENERGY EFFICIENCY INVESTMENT CHARGE (Cont'd.)  
For MEEIA Cycle 2 Plan

TD DETERMINATION (Cont'd.)

The Company shall file an update to NMR rates by month by Service Classification contemporaneous with filing any compliance tariff sheets in any general electric rate case reflecting the rates set in that case, and the billing determinants used in setting rates in such case. Updates to the NMR values shall be calculated following the same process described on pages 32-35 of the Company's filed December 22, 2014 2016-18 Energy Efficiency Plan.

NTGF = Net To Gross Factor. The initial NTGF is 0.85. Upon completion of the three year cycle, the final portfolio Net To Gross factor applied for the Earnings Opportunity shall be used as the NTGF prospectively starting with the month in which the Earnings Opportunity is determined.

Annual kWh savings per measure will be updated prospectively in the Company's TRM no later than twenty-four (24) months after the commencement of the plan based on EM&V ex-post gross adjustments determined for Year 1.

\* The Company shall file a general electric rate case at some point before February 28, 2021 to make a Rebasing Adjustment to rebase the TD arising from the MEEIA 2016-18 plan in its entirety, except as described below concerning Long-Lead Projects, and if Company fails to do so, the accrual and collection of the TD terminates beginning March 1, 2021. The filing of a general electric rate case utilizing an update or true-up period that ends between thirty (30) months and sixty (60) months after the effective date of the electric tariff sheets implementing MEEIA 2016-18 satisfies this requirement. For the rate case used to rebase the TD arising from the MEEIA 2016-18 plan in its entirety, the MEEIA normalization shall reach forward as far as the effective date of new rates in that rate case.

\*\* Projects designated as Long-Lead Projects shall continue to incur TD until a rate case rebases all such projects or until February 28, 2023, whichever occurs first.

\*Indicates Change. \*\*Indicates Addition.

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MO.P.S.C. SCHEDULE NO. 6 1st Revised SHEET NO. 91.9  
 CANCELLING MO.P.S.C. SCHEDULE NO. 6 Original SHEET NO. 91.9

APPLYING TO MISSOURI SERVICE AREA

**RIDER EEIC**  
**ENERGY EFFICIENCY INVESTMENT CHARGE (Cont'd.)**  
**For MEEIA Cycle 2 Plan**

**\*EO DETERMINATION**

EO shall be calculated using the matrix below. EO will not go below zero dollars (\$0). The EO at 100% is \$27,801,935. Before adjustments reflecting TD EM&V including NTG, the EO cannot go above \$39,212,516. The EO including adjustments reflecting TD EM&V including NTG cannot go above \$54,212,516. The cap is based on current program levels. If Commission approved new programs are added in years 2017 and 2018, the Company may seek Commission approval to have the targets and the cap of the EO matrix scale adjusted. EO shall be adjusted for the difference, with carrying cost at the Company's monthly Allowance for Funds Used During Construction (AFUDC) rate compounded semi-annually, between TD billed and what TD billed would have been if:

- (1) The ME used in the calculation were the normalized savings for each measure at customer meter per measure determined through EM&V ex-post gross analysis for each program year, and
- (2) The NTGF used in the calculation was the net-to-gross values determined through EM&V, except that if the NTGF value determined through EM&V is less than 0.80, the recalculation shall use 0.80 and if the NTG value determined through EM&V is greater than 1.0, the recalculation shall use 1.0.

**\*EARNINGS OPPORTUNITY MATRIX**

Performance Metric	Ameren Missouri						
	Payout Rate	Payout Unit	% of Target EO	100% payout	Target @ 100%	Cap/100% Multiplier	Cap
Home Energy Report criteria will be effective, prudent spend of budget	n/a		7.19%	\$ 2,000,000			\$ 2,000,000
EE MWh (Excl. Home Energy Report, TStat & LIMF): criteria will be the cumulative of the 1st yr incremental MWh during the 3 year plan	\$ 7.50	\$/MWh	15.11%	\$ 4,201,935	560,258	130%	\$ 5,462,516
EE Coincident MW (Excl. Home Energy Report, TStat & LIMF): criteria will be cumulative of the 2023 MW reduction, coincident with system peak	\$ 141,428.57	\$/MW	71.22%	\$ 19,800,000	140	150%	\$ 29,700,000
Number of Learning Thermostats Installed	\$ 30.62	\$/Unit	1.80%	\$ 500,000	16,331	150%	\$ 750,000
Low Income Multi-Family (LIMF) and Low Income Assistance Program: criteria will be effective, prudent spend of budget	n/a		4.68%	\$ 1,300,000			\$ 1,300,000
				<b>\$ 27,801,935</b>			<b>\$ 39,212,516</b>
Total Cap Including TD Adjustments							\$ 54,212,516

\*Indicates Change

**FILED**  
**Missouri Public**  
**Service Commission**  
**EO-2015-0055; YE-2017-0202**

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 ISSUED BY Michael Moehn President St. Louis, Missouri  
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MO.P.S.C. SCHEDULE NO. 6 Original SHEET NO. 91.10

CANCELLING MO.P.S.C. SCHEDULE NO. \_\_\_\_\_ SHEET NO. \_\_\_\_\_

APPLYING TO MISSOURI SERVICE AREA

RIDER EEIC  
ENERGY EFFICIENCY INVESTMENT CHARGE (Cont'd.)  
For MEEIA Cycle 2 Plan

FILING

The Company shall make a Rider EEIC filing each calendar year to be effective for the subsequent calendar year's February billing month. The Company is allowed or may be ordered by the Commission to make one other Rider EEIC filing in each calendar year with such subsequent filing to be effective beginning with either the June or October billing month. Rider EEIC filings shall be made at least sixty (60) days prior to their effective dates.

PRUDENCE REVIEWS

A prudence review shall be conducted no less frequently than at twenty-four (24) month intervals in accordance with 4 CSR 240-20.093(10). Any costs which are determined by the Commission to have been imprudently incurred or incurred in violation of the terms of this Rider EEIC shall be addressed through an adjustment in the next EEIR determination and reflected in factor OA herein.

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CANCELLED  
February 1, 2020  
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ISSUED BY Michael Moehn President St. Louis, Missouri  
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MO.P.S.C. SCHEDULE NO. 6 5th Revised SHEET NO. 91.11

CANCELLING MO.P.S.C. SCHEDULE NO. 6 4th Revised SHEET NO. 91.11

APPLYING TO MISSOURI SERVICE AREA

**RIDER EEIC**

**ENERGY EFFICIENCY INVESTMENT CHARGE (Cont'd.)**

\* (Applicable To Determination of EEIR Beginning February, 2019 through the Billing Month of May 2019)

**MEEIA 2013-15 EEIR Components (Applicable to MEEIA Cycle 1 Plan)**

Service Class	NPC/PE (\$/kWh)	NTD/PE (\$/kWh)	NPI/PE (\$/kWh)	NOA/PE (\$/kWh)
1 (M)-Residential Service	\$0.000000	\$0.000000	\$0.000039	\$0.000000
2 (M)-Small General Service	\$0.000000	\$0.000000	\$0.000055	\$0.000000
3 (M)-Large General Service	\$0.000000	\$0.000000	\$0.000112	\$0.000000
4 (M)-Small Primary Service	\$0.000000	\$0.000000	\$0.000094	\$0.000000
11 (M)-Large Primary Service	\$0.000000	\$0.000000	\$0.000185	\$0.000000
12 (M)-Large Transmission Service	\$0.000000	\$0.000000	\$0.000000	\$0.000000

**MEEIA 2016-18 EEIR Components (Applicable to MEEIA Cycle 2 Plan)**

Service Class	NPC/PE (\$/kWh)	NTD/PE (\$/kWh)	NEO/PE (\$/kWh)	NOA/PE (\$/kWh)
1 (M)-Residential Service	(\$0.000614)	\$0.001109	\$0.000000	\$0.000005
2 (M)-Small General Service	\$0.000580	\$0.002301	\$0.000000	(\$0.000002)
3 (M)-Large General Service	\$0.000584	\$0.001802	\$0.000000	(\$0.000002)
4 (M)-Small Primary Service	\$0.000598	\$0.001492	\$0.000000	(\$0.000002)
11 (M)-Large Primary Service	\$0.000687	\$0.000648	\$0.000000	(\$0.000002)
12 (M)-Large Transmission Service	\$0.000000	\$0.000000	\$0.000000	\$0.000000

**Summary EEIR Components and Total EEIR**

Service Class	NPC (\$/kWh)	NTD (\$/kWh)	(NEO+NPI) (\$/kWh)	NOA (\$/kWh)	Total EEIR (\$/kWh)
1 (M)-Residential Service	(\$0.000614)	\$0.001109	\$0.000039	\$0.000005	\$0.000539
2 (M)-Small General Service	\$0.000580	\$0.002301	\$0.000055	(\$0.000002)	\$0.002934
3 (M)-Large General Service	\$0.000584	\$0.001802	\$0.000112	(\$0.000002)	\$0.002496
4 (M)-Small Primary Service	\$0.000598	\$0.001492	\$0.000094	(\$0.000002)	\$0.002182
11 (M)-Large Primary Service	\$0.000687	\$0.000648	\$0.000185	(\$0.000002)	\$0.001518
12 (M)-Large Transmission Service	\$0.000000	\$0.000000	\$0.000000	\$0.000000	\$0.000000

\*Indicates Change

CANCELLED  
February 1, 2020  
Missouri Public  
Service Commission  
ER-2020-0147; YE-2020-0090

DATE OF ISSUE March 25, 2019 DATE EFFECTIVE May 25, 2019

ISSUED BY Michael Moehn President Missouri Public Service Commission St. Louis, Missouri  
NAME OF OFFICER TITLE ADDRESS  
ER-2019-0291; YE-2019-0172

MO.P.S.C. SCHEDULE NO. 6 4th Revised SHEET NO. 91.11

CANCELLING MO.P.S.C. SCHEDULE NO. 6 3rd Revised SHEET NO. 91.11

APPLYING TO MISSOURI SERVICE AREA

**RIDER EEIC**

**ENERGY EFFICIENCY INVESTMENT CHARGE (Cont'd.)**

(Applicable To Determination of EEIR Beginning February, 2019 through the Billing Month of January 2020)

**MEEIA 2013-15 EEIR Components (Applicable to MEEIA Cycle 1 Plan)**

Service Class	NPC/PE (\$/kWh)	NTD/PE (\$/kWh)	NPI/PE (\$/kWh)	NOA/PE (\$/kWh)
1 (M)-Residential Service	\$0.000000	\$0.000000	\$0.000039	\$0.000000
2 (M)-Small General Service	\$0.000000	\$0.000000	\$0.000055	\$0.000000
3 (M)-Large General Service	\$0.000000	\$0.000000	\$0.000112	\$0.000000
4 (M)-Small Primary Service	\$0.000000	\$0.000000	\$0.000094	\$0.000000
11 (M)-Large Primary Service	\$0.000000	\$0.000000	\$0.000185	\$0.000000
12 (M)-Large Transmission Service	\$0.000000	\$0.000000	\$0.000000	\$0.000000

**MEEIA 2016-18 EEIR Components (Applicable to MEEIA Cycle 2 Plan)**

Service Class	NPC/PE (\$/kWh)	NTD/PE (\$/kWh)	NEO/PE (\$/kWh)	NOA/PE (\$/kWh)
1 (M)-Residential Service	(\$0.000614)	\$0.001109	\$0.000000	\$0.000005
2 (M)-Small General Service	\$0.000580	\$0.002301	\$0.000000	(\$0.000002)
3 (M)-Large General Service	\$0.000584	\$0.001802	\$0.000000	(\$0.000002)
4 (M)-Small Primary Service	\$0.000598	\$0.001492	\$0.000000	(\$0.000002)
11 (M)-Large Primary Service	\$0.000687	\$0.000648	\$0.000000	(\$0.000002)
12 (M)-Large Transmission Service	\$0.000000	\$0.000000	\$0.000000	\$0.000000

**Summary EEIR Components and Total EEIR**

Service Class	NPC (\$/kWh)	NTD (\$/kWh)	(NEO+NPI) (\$/kWh)	NOA (\$/kWh)	Total EEIR (\$/kWh)
1 (M)-Residential Service	(\$0.000614)	\$0.001109	\$0.000039	\$0.000005	\$0.000539
2 (M)-Small General Service	\$0.000580	\$0.002301	\$0.000055	(\$0.000002)	\$0.002934
3 (M)-Large General Service	\$0.000584	\$0.001802	\$0.000112	(\$0.000002)	\$0.002496
4 (M)-Small Primary Service	\$0.000598	\$0.001492	\$0.000094	(\$0.000002)	\$0.002182
11 (M)-Large Primary Service	\$0.000687	\$0.000648	\$0.000185	(\$0.000002)	\$0.001518
12 (M)-Large Transmission Service	\$0.000000	\$0.000000	\$0.000000	\$0.000000	\$0.000000

CANCELLED  
May 25, 2019  
Missouri Public  
Service Commission

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DATE OF ISSUE November 20, 2018 DATE EFFECTIVE January 25, 2019

ISSUED BY Michael Moehn President **FILED** Missouri Public St. Louis, Missouri  
NAME OF OFFICER TITLE Service Commission ADDRESS

ER-2019-0151; YE-2019-0095

MO.P.S.C. SCHEDULE NO. 6 1st Revised SHEET NO. 91.12CANCELLING MO.P.S.C. SCHEDULE NO. 6 Original SHEET NO. 91.12APPLYING TO MISSOURI SERVICE AREA

**RIDER EEIC**  
**ENERGY EFFICIENCY INVESTMENT CHARGE**  
**For MEEIA 2019-21 Plan**

**APPLICABILITY**

This Rider EEIC - Energy Efficiency Investment Charge (Rider EEIC) is applicable to all kilowatt-hours (kWh) of energy supplied to customers served under Company's Service Classification Nos. 1(M), 2(M), 3(M), 4(M), 11(M), and 12(M), excluding kWh of energy supplied to "opt-out" or "Low-income" customers.

An Ameren Missouri Low-income customer who has received assistance from Missouri Energy Assistance (a.k.a. Low Income Home Energy Assistance Program or LIHEAP), Winter Energy Crisis Intervention Program, or Summer Energy Crisis Intervention Program and (i) whose account has not automatically been exempt from Rider EEIC, or (ii) who has been charged Rider EEIC charges and whose account has not been credited for said charges, may provide the Company, via facsimile to **866.297.8054**, via email to [myhomeamerenmissouri@ameren.com](mailto:myhomeamerenmissouri@ameren.com), or via regular mail to **Ameren Missouri, P.O. Box 790098, St. Louis, MO 63179-0098**

- a. documentation of the assistance received in the form of:
  - i. a copy of the Division of Social Services Family Support Division ("DSSFSD") form EA-7 energy assistance payment notice received by the Low-income customer, or
  - ii. a copy of the DSSFSD LIHEAP Energy Assistance direct payment check received by the Low-income customer, or
  - iii. a copy of the Contract Agency energy crisis intervention program ("ECIP") payment notification letter received by the Low-income customer, or
  - iv. a printout of the Low-income customer's DSSFSD LIHEAP EA EIRG System Registration screen identifying the supplier, benefit amount and payment processing date.
- b. Upon receipt of the documentation, the Company will credit the Low-income customer's account within 12 billing months following the documented receipt of energy assistance for:
  - i. energy efficiency investment charges, and
  - ii. any municipal charges attributable to said EEIC charges that were previously charged to the Low-income customer;
- c. Upon receipt of the documentation, for the remainder of the 12 months following the documented receipt of energy assistance, the Company will exempt such Low-income customer from any Rider EEIC charges thereafter imposed. The exemption will be evidenced on the Low-income customer's bill as an EEIC charge, followed by a credit.

Charges passed through this Rider EEIC reflect the charges approved to be billed from the implementation of the Missouri Energy Efficiency Investment Act (MEEIA) 2019-21 Plan and any remaining unrecovered balances from the MEEIA 2016-18 Plan. Those charges include:

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Missouri Public  
Service Commission  
JE-2020-0023

DATE OF ISSUE August 2, 2019 DATE EFFECTIVE September 1, 2019ISSUED BY Michael Moehn President St. Louis, Missouri  
NAME OF OFFICER TITLE ADDRESS

MO.P.S.C. SCHEDULE NO. 6 Original SHEET NO. 91.12

CANCELLING MO.P.S.C. SCHEDULE NO. \_\_\_\_\_ SHEET NO. \_\_\_\_\_

APPLYING TO MISSOURI SERVICE AREA

RIDER EEIC  
ENERGY EFFICIENCY INVESTMENT CHARGE  
For MEEIA 2019-21 Plan

**APPLICABILITY**

This Rider EEIC - Energy Efficiency Investment Charge (Rider EEIC) is applicable to all kilowatt-hours (kWh) of energy supplied to customers served under Company's Service Classification Nos. 1(M), 2(M), 3(M), 4(M), 11(M), and 12(M), excluding kWh of energy supplied to "opt-out" or "Low-income" customers.

An Ameren Missouri Low-income customer who has received assistance from Missouri Energy Assistance (a.k.a. Low Income Home Energy Assistance Program or LIHEAP), Winter Energy Crisis Intervention Program, or Summer Energy Crisis Intervention Program and (i) whose account has not automatically been exempt from Rider EEIC, or (ii) who has been charged Rider EEIC charges and whose account has not been credited for said charges, may provide the Company, via facsimile to **866.297.8054**, via email to [myhomeamerenmissouri@ameren.com](mailto:myhomeamerenmissouri@ameren.com), or via regular mail to **Ameren Missouri, P.O. Box 790352, St. Louis, MO 63179-0352**

- a. documentation of the assistance received in the form of:
  - i. a copy of the Division of Social Services Family Support Division ("DSSFSD") form EA-7 energy assistance payment notice received by the Low-income customer, or
  - ii. a copy of the DSSFSD LIHEAP Energy Assistance direct payment check received by the Low-income customer, or
  - iii. a copy of the Contract Agency energy crisis intervention program ("ECIP") payment notification letter received by the Low-income customer, or
  - iv. a printout of the Low-income customer's DSSFSD LIHEAP EA EIRG System Registration screen identifying the supplier, benefit amount and payment processing date.
- b. Upon receipt of the documentation, the Company will credit the Low-income customer's account within 12 billing months following the documented receipt of energy assistance for:
  - i. energy efficiency investment charges, and
  - ii. any municipal charges attributable to said EEIC charges that were previously charged to the Low-income customer;
- c. Upon receipt of the documentation, for the remainder of the 12 months following the documented receipt of energy assistance, the Company will exempt such Low-income customer from any Rider EEIC charges thereafter imposed. The exemption will be evidenced on the Low-income customer's bill as an EEIC charge, followed by a credit.

Charges passed through this Rider EEIC reflect the charges approved to be billed from the implementation of the Missouri Energy Efficiency Investment Act (MEEIA) 2019-21 Plan and any remaining unrecovered balances from the MEEIA 2016-18 Plan. Those charges include:

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September 1, 2019  
Missouri Public  
Service Commission  
JE-2020-0023

DATE OF ISSUE	December 21, 2018	DATE EFFECTIVE	January 20, 2019
ISSUED BY	Michael Moehn	President	St. Louis, Missouri
	NAME OF OFFICER	TITLE	ADDRESS

MO.P.S.C. SCHEDULE NO. 6 1st Revised SHEET NO. 91.13

CANCELLING MO.P.S.C. SCHEDULE NO. 6 Original SHEET NO. 91.13

APPLYING TO MISSOURI SERVICE AREA

**RIDER EEIC**  
**ENERGY EFFICIENCY INVESTMENT CHARGE (Cont'd.)**  
**For MEEIA 2019-21 Plan**

**APPLICABILITY (Cont'd.)**

- 1) Program Costs, Company's Throughput Disincentive (TD) and Earnings Opportunity Award (if any) for each Effective Period (EP).
- 2) Reconciliations, with interest, to true-up for differences between the revenues billed under this Rider EEIC and total actual monthly amounts for:
  - i) Program Costs incurred in the MEEIA 2019-21 Plan and/or remaining unrecovered Program Cost balances for MEEIA 2016-18;
  - ii) Company's TD incurred in the MEEIA 2019-21 Plan and/or remaining unrecovered TD balances for MEEIA 2016-18;
  - iii) Amortization of Earnings Opportunity Award ordered by the Missouri Public Service Commission (Commission) for the MEEIA 2019-21 Plan and/or remaining unrecovered EO balances for MEEIA 2016-18.
- 3) Any Ordered Adjustments.

Charges under this Rider EEIC shall continue after the anticipated December 31, 2021 end of the non-low-income portions of the MEEIA 2019-21 Plan and after December 31, 2024 for the low-income portion of the MEEIA 2019-21 Plan until such time as the charges described in items 1), 2), and 3) above have been billed. Any programs and/or balance associated with the low-income portions of the MEEIA 2019-21 Plan may be rolled into the recovery mechanism for an approved MEEIA program that commences in 2022.

Charges arising from the MEEIA 2019-21 Plan that are the subject of this Rider EEIC shall be reflected in one "Energy Efficiency Invest Chg" on customers' bills in combination with any charges arising from a rider that is applicable to previous MEEIA plans.

**DEFINITIONS**

As used in this Rider EEIC, the following definitions shall apply:

"Deemed Savings Table" means a list of Measures derived from the Company's TRM that characterizes associated gross energy and demand savings with Company-specific Measure parameters where available, as outlined in Appendix F to the MEEIA 2019-21 Plan and updated as provided for herein based on EM&V ex-post gross adjustments.

"Earnings Opportunity Award" (EO) means the dollar amount calculated for each Program Year by the EO Calculator as described in the Earnings Opportunity Award Determination section below.

\* "Effective Period" (EP) means the months for which an approved EEIR is to be effective, i. e., the twelve (12) months beginning with February and ending with January unless there is an additional Rider EEIC filing made to change the Energy Efficiency Investment Rate components during a calendar year, the EP for such a filing shall begin with the either June or October and end with the subsequent January.

"End Use Category" means the unique summary category of end-use load shapes. The **FILED** list of End Use Categories is included in Appendix G to the MEEIA 2019-21 Plan **Missouri Public Service Commission**

\*Indicates Change.

**ER-2020-0147; YE-2020-0090**

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DATE OF ISSUE November 22, 2019 DATE EFFECTIVE ~~January 21, 2020~~ February 1, 2020

ISSUED BY Michael Moehn President St. Louis, Missouri  
 NAME OF OFFICER TITLE ADDRESS

MO.P.S.C. SCHEDULE NO. 6 Original SHEET NO. 91.13

CANCELLING MO.P.S.C. SCHEDULE NO. \_\_\_\_\_ SHEET NO. \_\_\_\_\_

APPLYING TO MISSOURI SERVICE AREA

**RIDER EEIC**  
**ENERGY EFFICIENCY INVESTMENT CHARGE (Cont'd.)**  
**For MEEIA 2019-21 Plan**

**APPLICABILITY (Cont'd.)**

- 1) Program Costs, Company's Throughput Disincentive (TD) and Earnings Opportunity Award (if any) for each Effective Period (EP).
- 2) Reconciliations, with interest, to true-up for differences between the revenues billed under this Rider EEIC and total actual monthly amounts for:
  - i) Program Costs incurred in the MEEIA 2019-21 Plan and/or remaining unrecovered Program Cost balances for MEEIA 2016-18;
  - ii) Company's TD incurred in the MEEIA 2019-21 Plan and/or remaining unrecovered TD balances for MEEIA 2016-18;
  - iii) Amortization of Earnings Opportunity Award ordered by the Missouri Public Service Commission (Commission) for the MEEIA 2019-21 Plan and/or remaining unrecovered EO balances for MEEIA 2016-18.
- 3) Any Ordered Adjustments.

Charges under this Rider EEIC shall continue after the anticipated December 31, 2021 end of the non-low-income portions of the MEEIA 2019-21 Plan and after December 31, 2024 for the low-income portion of the MEEIA 2019-21 Plan until such time as the charges described in items 1), 2), and 3) above have been billed. Any programs and/or balance associated with the low-income portions of the MEEIA 2019-21 Plan may be rolled into the recovery mechanism for an approved MEEIA program that commences in 2022.

Charges arising from the MEEIA 2019-21 Plan that are the subject of this Rider EEIC shall be reflected in one "Energy Efficiency Invest Chg" on customers' bills in combination with any charges arising from a rider that is applicable to previous MEEIA plans.

**DEFINITIONS**

As used in this Rider EEIC, the following definitions shall apply:

"Deemed Savings Table" means a list of Measures derived from the Company's TRM that characterizes associated gross energy and demand savings with Company-specific Measure parameters where available, as outlined in Appendix F to the MEEIA 2019-21 Plan and updated as provided for herein based on EM&V ex-post gross adjustments.

"Earnings Opportunity Award" (EO) means the dollar amount calculated for each Program Year by the EO Calculator as described in the Earnings Opportunity Award Determination section below.

"Effective Period" (EP) means the billing months for which an approved EEIR is to be effective, i. e., the 12 billing months beginning with the February billing month and ending with the January billing month unless here is an additional Rider EEIC filing is made to change the Energy Efficiency Investment Rate components during a calendar year, the EP for such a filing shall begin with the June or October billing month and end with the subsequent January billing month.

"End Use Category" means the unique summary category of end-use load shapes. The list of End Use Categories is included in Appendix G to the MEEIA 2019-21 Plan.

FILED  
Missouri Public  
Service Commission  
EO-2018-0211; YE-2019-0133

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February 1, 2020  
Missouri Public  
Service Commission  
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DATE OF ISSUE	<u>December 21, 2018</u>	DATE EFFECTIVE	<u>January 20, 2019</u>
ISSUED BY	<u>Michael Moehn</u>	<u>President</u>	<u>St. Louis, Missouri</u>
	NAME OF OFFICER	TITLE	ADDRESS

MO.P.S.C. SCHEDULE NO. 6 Original SHEET NO. 91.14

CANCELLING MO.P.S.C. SCHEDULE NO. \_\_\_\_\_ SHEET NO. \_\_\_\_\_

APPLYING TO MISSOURI SERVICE AREARIDER EEICENERGY EFFICIENCY INVESTMENT CHARGE (Cont'd.)For MEEIA 2019-21 PlanDEFINITIONS (Cont'd.)

"Incremental Internal Labor Cost and Associated Benefits" (IIL) means the labor costs and associated benefits of personnel 1) hired by Ameren Missouri after Commission approval of the MEEIA 2019-21 Plan that were (a) not hired to replace an Ameren Missouri or Ameren Services Company employee whose labor and benefit costs were accounted for in Ameren Missouri's prior general rate proceeding, (b) hired by Ameren Missouri and assigned exclusively to support Ameren Missouri's MEEIA Programs; and 2) were not an Ameren Missouri or Ameren Services Company employee whose labor and benefit costs were accounted for in Ameren Missouri's prior general rate proceeding.

"Evaluation Measurement & Verification" (EM&V) means the performance of studies and activities intended to evaluate the process of the Company's Program delivery and oversight and to estimate and/or verify the estimated actual energy and demand savings, cost effectiveness, and other effects from demand-side Programs.

"Incentive" means any consideration provided by the Company, including, but not limited to, buy downs, markdowns, rebates, bill credits, payments to third parties, direct installation, giveaways, and education, which encourages the adoption of Program Measures.

"Low-Income" customers means those Service Classification 1(M) residential customers eligible for the low income exemption provisions contained in Section 393.1075.6, RSMo. As approved in File No. ER-2014-0258, customers eligible under this definition will be exempt from Rider EEIC charges for 12 billing months following assistance received from either Missouri Energy Assistance (a.k.a. Low Income Home Energy Assistance Program or LIHEAP), Winter Energy Crisis Intervention Program, Summer Energy Crisis Intervention Program, the Company's Keeping Current Low Income Pilot Program, and/or the Company's Keeping Cool Low Income Pilot Program.

"Measure" means the same as defined in 4 CSR 240-20.092(1)FF.

"MEEIA 2016-18 Plan" means Company's "2016-18 Energy Efficiency Plan" approved in File No. EO-2015-0055.

"MEEIA 2019-21 Plan" means Company's "2019-21 MEEIA Energy Efficiency Plan" approved in File No. EO-2018-0211 as may be amended.

"Programs" means MEEIA 2019-21 programs listed in tariff sheet nos. 174 and 174.1.

"Program Costs" means any prudently incurred Program expenditures, including such items as Program planning, education Programs, Program design, administration, delivery, end-use Measures and Incentive payments, advertising expense, EM&V, market potential studies, work on a Company and/or statewide Technical Resource Manual, and IIL.

"Program Year" means the period of Programs that ends on December 31 of each year of the MEEIA 2019-21 Plan. The first Program Year will be 10 months long and each subsequent Program Year will be 12 months long.

"TRM" means the Company's Technical Resource Manual (attached as Appendices G-I to the MEEIA 2019-21 Plan) and updated based on EM&V ex-post gross adjustments.

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Service Commission  
EO-2018-0211; YE-2019-0133

DATE OF ISSUE December 21, 2018 DATE EFFECTIVE January 20, 2019ISSUED BY Michael Moehn President St. Louis, Missouri  
NAME OF OFFICER TITLE ADDRESS

MO.P.S.C. SCHEDULE NO. 6 Original SHEET NO. 91.15

CANCELLING MO.P.S.C. SCHEDULE NO. \_\_\_\_\_ SHEET NO. \_\_\_\_\_

APPLYING TO MISSOURI SERVICE AREA

RIDER EEIC  
ENERGY EFFICIENCY INVESTMENT CHARGE (Cont'd.)  
For MEEIA 2019-21 Plan

ENERGY EFFICIENCY INVESTMENT RATE (EEIR) DETERMINATION

The EEIR during each applicable EP is a dollar per kWh rate for each applicable Service Classification calculated as follows:

$$EEIR = [NPC + NTD + NEO + NOA] / PE$$

Where:

NPC = Net Program Costs for the applicable EP as defined below,

$$NPC = PPC + PCR$$

PPC = Projected Program Costs is an amount equal to Program Costs projected by the Company to be incurred during the applicable EP.

PCR = Program Costs Reconciliation is equal to the cumulative difference, if any, between the PPC revenues billed resulting from the application of the NPC component of the EEIR and the actual Program Costs incurred through the end of the previous EP (which will reflect projections through the end of the previous EP due to timing of adjustments). Such amounts shall include monthly interest charged at the Company's monthly short-term borrowing rate. Any remaining PCR balance from MEEIA 2016-18 shall be rolled into the PCR calculation starting February 2022.

NTD = Net Throughput Disincentive for the applicable EP as defined below,

$$NTD = PTD + TDR$$

PTD = Projected Throughput Disincentive is the Company's TD projected by the Company to be incurred during the applicable EP. For the detailed method for calculating the TD, see Sheet 91.17.

TDR = Throughput Disincentive Reconciliation is equal to the cumulative difference, if any, between the PTD revenues billed during the previous EP resulting from the application of the NTD component of the EEIR and the Company's TD through the end of the previous EP (which will reflect projections through the end of the previous EP due to timing of adjustments). Such amounts shall include monthly interest charged at the Company's monthly short-term borrowing rate. Any remaining TDR balance from MEEIA 2016-18 shall be rolled into the TDR calculation starting February 2024.

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ISSUED BY Michael Moehn President St. Louis, Missouri  
NAME OF OFFICER TITLE ADDRESS



MO.P.S.C. SCHEDULE NO. 6 Original SHEET NO. 91.16

CANCELLING MO.P.S.C. SCHEDULE NO. \_\_\_\_\_ SHEET NO. \_\_\_\_\_

APPLYING TO MISSOURI SERVICE AREA

RIDER EEIC  
ENERGY EFFICIENCY INVESTMENT CHARGE (Cont'd.)  
For MEEIA 2019-21 Plan

EEIR DETERMINATION (Cont'd.)

NEO = Net Earnings Opportunity for the applicable EP as defined below,

$$NEO = EO + EOR$$

EO = Earnings Opportunity is equal to the sum of the monthly amortizations of each Program Year's Earnings Opportunity Award multiplied by the number of billing months in the applicable EP.

A monthly amortization shall be determined by dividing each Program Year's Earnings Opportunity Award by 12. The monthly amortization of each Program Year's Earnings Opportunity Award will continue through each subsequent EEIR determination until such time that the total Earnings Opportunity Award for that Program Year has been fully amortized.

EOR = Earnings Opportunity Reconciliation is equal to the cumulative difference, if any, between the EO revenues billed resulting from the application of the EEIR and the monthly amortization of the EO through the end of the previous EP (which will reflect projections through the end of the previous EP due to timing of adjustments). Such amounts shall include monthly interest charged at the Company's monthly short-term borrowing rate. Any remaining EO balance from MEEIA 2016-18 shall be rolled into the EOR calculation starting February 2022.

NOA = Net Ordered Adjustment for the applicable EP as defined below,

$$NOA = OA + OAR$$

OA = Ordered Adjustment is the amount of any adjustment to the EEIR ordered by the Commission as a result of prudence reviews and/or corrections under this Rider EEIC. Such amounts shall include monthly interest at the Company's monthly short-term borrowing rate.

OAR = Ordered Adjustment Reconciliation is equal to the cumulative difference, if any, between the OA revenues billed resulting from the application of the EEIR and the actual OA ordered by the Commission through the end of the previous EP (which will reflect projections through the end of the previous EP due to timing of adjustments). Such amounts shall include monthly interest charged at the Company's monthly short-term borrowing rate.

PE = Projected Energy, in kWh, forecasted to be delivered to the customers to which the Rider EEIC applies during the applicable EP.

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Service Commission  
EO-2018-0211; YE-2019-0133

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ISSUED BY Michael Moehn President St. Louis, Missouri  
NAME OF OFFICER TITLE ADDRESS

MO.P.S.C. SCHEDULE NO. 6 Original SHEET NO. 91.17

CANCELLING MO.P.S.C. SCHEDULE NO. \_\_\_\_\_ SHEET NO. \_\_\_\_\_

APPLYING TO MISSOURI SERVICE AREA

**RIDER EEIC**  
**ENERGY EFFICIENCY INVESTMENT CHARGE (Cont'd.)**  
**For MEEIA 2019-21 Plan**

**EEIR DETERMINATION (Cont'd.)**

The EEIR components and total EEIR applicable to the individual Service Classifications shall be rounded to the nearest \$0.000001.

Allocations of charges for each applicable Service Classification will be made in accordance with the MEEIA 2019-21 Plan.

This Rider EEIC shall not be applicable to customers that have satisfied the opt-out provisions contained in Section 393.1075.7, RSMo or the Low-income exemption provisions described herein.

**TD DETERMINATION**

Monthly TD is the sum of the TD calculation for all End Use Categories and Demand Response Event Net Energy (DRENE).

The TD for each End Use Category shall be determined by the following formula:

$$TD = MS \times NMR \times NTGF$$

Where:

- TD = Throughput Disincentive, in dollars, to be collected for a given month, for a given Service Classification.
- MS = Monthly Savings, is the sum of all Programs' monthly savings, in kWh, for a given month, for a given Service Classification. The MS for each End Use Category shall be determined by the following formula:

$$MS = ((MAS_{CM} / 2) + CAS - RB) \times LS + DRENE_{CM}$$

Where:

MAS<sub>CM</sub> = The sum of (MC x ME) for all Measures in a Program in the current calendar month.

MC = Measure Count. MC for a given month, for a given Service Classification, for each Measure, is the number of each Measure installed in the current calendar month. For the Home Energy Report Program, the number of reports mailed during the current calendar month shall be used as the Measure Count.

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MO.P.S.C. SCHEDULE NO. 6 Original SHEET NO. 91.18

CANCELLING MO.P.S.C. SCHEDULE NO. \_\_\_\_\_ SHEET NO. \_\_\_\_\_

APPLYING TO MISSOURI SERVICE AREA

RIDER EEIC  
ENERGY EFFICIENCY INVESTMENT CHARGE (Cont'd.)  
For MEEIA 2019-21 Plan

TD DETERMINATION (Cont'd.)

- ME = Measure Energy. ME will be determined as follows, for each Measure:
  - a. For Measures in the Deemed Savings Table (including Residential Demand Response energy savings not included in  $DRENE_{CM}$ ), the ME is the annual total of normalized savings for each Measure at customer meter per Measure defined in the Company's current Deemed Savings Table.
  - b. For Measures not in the Deemed Savings Table, the ME will be the annual value attributable to the installations reported monthly by the Program administrator.
  
- CM = Current calendar month.
  
- CAS = Cumulative sum of MAS of all prior calendar months for each End Use Category for the MEEIA 2019-21 Plan.
  
- RB = Rebasing Adjustment. The RB shall equal the CAS applicable as of the date used for MEEIA normalization when base rates are adjusted in any general electric rate case or otherwise resulting in new retail electric rates becoming effective during the accrual and collection of TD pursuant to this MEEIA 2019-21 Plan. In the event base rates are adjusted by more than one general electric rate case or otherwise resulting in new rates becoming effective during the accrual and collection of TD pursuant to this MEEIA 2019-21 Plan occurs, the RB adjustment shall include each and every prior RB adjustment calculation.
  
- LS = Load Shape. The LS is the monthly load shape percent (%) for each End-Use Category (included in the MEEIA 2019-21 Plan).
  
- $DRENE_{CM}$  = Demand Response Event Net Energy for the Current Month.  $DRENE_{CM}$  is the net energy savings resulting from demand response events during the month as reported by the program administrator consistent with TRM guidance.  $DRENE_{CM}$  incurred during the time period used for establishing billing determinants in general rate proceedings will be added back to those billing determinants and will not be included in the Rebasing Adjustment.

FILED  
 Missouri Public  
 Service Commission  
 EO-2018-0211; YE-2019-0133

DATE OF ISSUE December 21, 2018 DATE EFFECTIVE January 20, 2019

ISSUED BY Michael Moehn President St. Louis, Missouri  
 NAME OF OFFICER TITLE ADDRESS

MO.P.S.C. SCHEDULE NO. 6 1st Revised SHEET NO. 91.19

CANCELLING MO.P.S.C. SCHEDULE NO. 6 Original SHEET NO. 91.19

APPLYING TO MISSOURI SERVICE AREA

**RIDER EEIC**  
**ENERGY EFFICIENCY INVESTMENT CHARGE (Cont'd.)**  
**For MEEIA 2019-21 Plan**

\* **TD DETERMINATION (Cont'd.)**

NMR = Net Margin Revenue. NMR values for each applicable Service Classification and by End Use Category where applicable are as follows:

Month	Service Classifications	
	1 (M) Res \$/kWh	2 (M) SGS \$/kWh
January	0.044375	0.053661
February	0.045622	0.055252
March	0.047230	0.057794
April	0.047618	0.058522
May	0.049702	0.061238
June	0.104792	0.090992
July	0.104792	0.090992
August	0.104792	0.090992
September	0.104792	0.090992
October	0.046772	0.059083
November	0.049328	0.060646
December	0.046037	0.056723

Month	MISC./AIR COMP./ PROCESS/MOTORS			COOLING			EXT LIGHTING		
	3M	4M	11M	3M	4M	11M	3M	4M	11M
January	0.032900	0.032612	0.026759	0.025861	0.023079	0.018069	0.025881	0.024801	0.019697
February	0.033629	0.033309	0.027253	0.026528	0.023200	0.018069	0.026544	0.023220	0.019747
March	0.034622	0.033845	0.027386	0.027113	0.023356	0.018069	0.027131	0.023622	0.018321
April	0.033775	0.034296	0.027399	0.037753	0.036687	0.028390	0.028126	0.024779	0.019553
May	0.036715	0.036755	0.031260	0.049020	0.055877	0.046776	0.028293	0.023963	0.018366
June	0.068381	0.067156	0.053324	0.085725	0.089526	0.077183	0.045440	0.037585	0.020588
July	0.066040	0.065258	0.050240	0.079928	0.081437	0.059184	0.044249	0.037499	0.020010
August	0.068091	0.066149	0.049954	0.083828	0.086016	0.065846	0.045361	0.037610	0.020626
September	0.066093	0.064668	0.050927	0.086550	0.091348	0.077816	0.045532	0.037858	0.020587
October	0.035712	0.035715	0.032402	0.038227	0.036561	0.031288	0.027123	0.023675	0.018308
November	0.036135	0.035963	0.030643	0.027736	0.023477	0.018069	0.027875	0.023669	0.018096
December	0.033574	0.031724	0.028852	0.026528	0.023245	0.018069	0.026684	0.023265	0.018274

\*Indicates Change.

FILED  
Missouri Public  
Service Commission  
ER-2019-0335; YE-2020-0164

Issued pursuant to the Order of the Mo.P.S.C. in Case No. ER-2019-0335.

DATE OF ISSUE March 18, 2020 DATE EFFECTIVE April 1, 2020

ISSUED BY Martin J. Lyons Chairman & President St. Louis, Missouri  
NAME OF OFFICER TITLE ADDRESS

MO.P.S.C. SCHEDULE NO. 6 Original SHEET NO. 91.19

CANCELLING MO.P.S.C. SCHEDULE NO. \_\_\_\_\_ SHEET NO. \_\_\_\_\_

APPLYING TO MISSOURI SERVICE AREA

**RIDER EEIC**  
**ENERGY EFFICIENCY INVESTMENT CHARGE (Cont'd.)**  
**For MEEIA 2019-21 Plan**

**TD DETERMINATION (Cont'd.)**

NMR = Net Margin Revenue. NMR values for each applicable Service Classification and by End Use Category where applicable are as follows:

Month	Service Classifications	
	1 (M) Res \$/kWh	2 (M) SGS \$/kWh
January	0.040912	0.048845
February	0.042255	0.050525
March	0.044016	0.053255
April	0.047279	0.056875
May	0.048669	0.058104
June	0.103081	0.089681
July	0.103081	0.089681
August	0.103081	0.089681
September	0.103081	0.089681
October	0.044204	0.054614
November	0.047620	0.056771
December	0.044224	0.054182

Month	MISC./AIR COMP./ PROCESS/MOTORS			COOLING			EXT LIGHTING		
	3M	4M	11M	3M	4M	11M	3M	4M	11M
January	0.028837	0.029367	0.022321	0.020434	0.018259	0.012194	0.020459	0.020099	0.014092
February	0.030424	0.028156	0.023022	0.021371	0.016681	0.012194	0.021389	0.016704	0.014169
March	0.027963	0.029522	0.023028	0.020814	0.018474	0.024788	0.020832	0.018730	0.012477
April	0.031394	0.029638	0.023969	0.036473	0.033537	0.025435	0.024082	0.020250	0.014023
May	0.033144	0.031688	0.022296	0.047361	0.050122	0.038579	0.023474	0.019354	0.009123
June	0.067466	0.063761	0.047784	0.085470	0.085609	0.070991	0.043839	0.035239	0.016554
July	0.064869	0.062199	0.047090	0.079600	0.077784	0.056470	0.041855	0.034766	0.015981
August	0.064941	0.062284	0.048728	0.080858	0.081328	0.065873	0.042049	0.034934	0.016664
September	0.064744	0.061714	0.050555	0.086388	0.088530	0.080601	0.043088	0.035014	0.016628
October	0.031406	0.030110	0.026031	0.035669	0.032810	0.026007	0.022105	0.018803	0.012432
November	0.031883	0.029601	0.025073	0.036271	0.018471	0.025714	0.022845	0.018645	0.012223
December	0.031376	0.029519	0.024128	0.021906	0.018622	0.012194	0.022103	0.018646	0.012434

FILED  
Missouri Public  
Service Commission  
EO-2018-0211; YE-2019-0133

CANCELLED  
April 1, 2020  
Missouri Public  
Service Commission  
ER-2019-0335; YE-2020-0164

DATE OF ISSUE December 21, 2018 DATE EFFECTIVE January 20, 2019

ISSUED BY Michael Moehn President St. Louis, Missouri  
NAME OF OFFICER TITLE ADDRESS

MO.P.S.C. SCHEDULE NO. 6 1st Revised SHEET NO. 91.20

CANCELLING MO.P.S.C. SCHEDULE NO. 6 Original SHEET NO. 91.20

APPLYING TO MISSOURI SERVICE AREA

**RIDER EEIC**  
**ENERGY EFFICIENCY INVESTMENT CHARGE (Cont'd.)**  
**For MEEIA 2019-21 Plan**

\* **TD DETERMINATION (Cont'd.)**

Month	HVAC/BUILDING SHELL			LIGHTING			REFRIG.		
	3M	4M	11M	3M	4M	11M	3M	4M	11M
January	0.034640	0.038339	0.031730	0.034154	0.034350	0.028287	0.031757	0.031025	0.025268
February	0.036376	0.037276	0.032064	0.034537	0.034615	0.028269	0.032324	0.031559	0.025719
March	0.038793	0.038233	0.030006	0.035791	0.035557	0.028425	0.033226	0.033444	0.027040
April	0.034113	0.033239	0.027835	0.035679	0.037511	0.029861	0.033493	0.033976	0.027033
May	0.042518	0.045739	0.039120	0.038560	0.039603	0.033858	0.035508	0.035005	0.029512
June	0.084877	0.088426	0.076134	0.072455	0.072404	0.058526	0.065449	0.055448	0.050269
July	0.079539	0.080952	0.058800	0.069884	0.069434	0.053755	0.063150	0.061512	0.044695
August	0.083309	0.085358	0.065285	0.072041	0.071117	0.053427	0.065251	0.062669	0.045773
September	0.083042	0.086756	0.073496	0.067956	0.067096	0.053491	0.063332	0.061168	0.047068
October	0.035901	0.035979	0.031467	0.037663	0.038461	0.035627	0.034427	0.033943	0.030495
November	0.038133	0.034794	0.037912	0.037126	0.037867	0.032129	0.034856	0.034333	0.028386
December	0.034440	0.034887	0.027827	0.033944	0.032253	0.029716	0.032491	0.030253	0.027377

Month	COOK.			DHW			HEAT.		
	3M	4M	11M	3M	4M	11M	3M	4M	11M
January	0.033317	0.032232	0.026424	0.033896	0.030868	0.025223	0.034640	0.038340	0.031731
February	0.033644	0.033331	0.026935	0.033889	0.032405	0.025691	0.036391	0.037298	0.032084
March	0.034613	0.036345	0.029822	0.034447	0.035561	0.029033	0.039224	0.038760	0.030380
April	0.036261	0.038190	0.030592	0.036945	0.037340	0.029871	0.036453	0.036565	0.030831
May	0.038356	0.039289	0.033580	0.039467	0.038724	0.033069	0.035633	0.035091	0.029693
June	0.073451	0.073688	0.060207	0.073371	0.073584	0.062138	0.045009	0.037016	0.019928
July	0.070691	0.070597	0.050174	0.070692	0.069507	0.047691	0.043836	0.036937	0.019928
August	0.073116	0.072469	0.053325	0.073050	0.072387	0.052594	0.044944	0.037067	0.019928
September	0.070168	0.069982	0.056531	0.069254	0.068789	0.055276	0.068142	0.067339	0.053748
October	0.037338	0.038002	0.035099	0.038316	0.037496	0.035069	0.037690	0.038499	0.033761
November	0.036955	0.038397	0.030680	0.038210	0.037851	0.029561	0.038654	0.035365	0.038768
December	0.034237	0.031730	0.030777	0.035224	0.030961	0.030358	0.034444	0.034893	0.027832

Month	OFFICE			VENT		
	3M	4M	11M	3M	4M	11M
January	0.032964	0.033103	0.027191	0.031426	0.031522	0.025799
February	0.033396	0.032974	0.027177	0.032013	0.030991	0.025768
March	0.034302	0.033567	0.027161	0.032890	0.031910	0.025782
April	0.033729	0.034260	0.027339	0.033430	0.033711	0.026952
May	0.036608	0.036591	0.031105	0.035766	0.035296	0.029886
June	0.066802	0.065117	0.051097	0.065063	0.062870	0.048893
July	0.064588	0.063533	0.049365	0.063340	0.062005	0.047494
August	0.066562	0.064227	0.048408	0.065290	0.062630	0.047000
September	0.063673	0.061513	0.047550	0.062841	0.060431	0.046374
October	0.035672	0.035658	0.032262	0.034778	0.034402	0.030888
November	0.035710	0.035164	0.030237	0.033876	0.032368	0.027854
December	0.032831	0.030960	0.027638	0.032515	0.030851	0.027136

\*Indicates Change.

FILED  
Missouri Public  
Service Commission  
ER-2019-0335; YE-2020-0164

Issued pursuant to the Order of the Mo.P.S.C. in Case No. ER-2019-0335.  
DATE OF ISSUE March 18, 2020 DATE EFFECTIVE April 1, 2020  
ISSUED BY Martin J. Lyons Chairman & President St. Louis, Missouri  
NAME OF OFFICER TITLE ADDRESS

MO.P.S.C. SCHEDULE NO. 6

Original

SHEET NO. 91.20

CANCELLING MO.P.S.C. SCHEDULE NO. \_\_\_\_\_

SHEET NO. \_\_\_\_\_

APPLYING TO \_\_\_\_\_

**MISSOURI SERVICE AREA**

**RIDER EEIC**  
**ENERGY EFFICIENCY INVESTMENT CHARGE (Cont'd.)**  
**For MEEIA 2019-21 Plan**

**TD DETERMINATION (Cont'd.)**

Month	HVAC/BUILDING SHELL			LIGHTING			REFRIG.		
	3M	4M	11M	3M	4M	11M	3M	4M	11M
January	0.030917	0.034631	0.028109	0.030337	0.030348	0.024101	0.027471	0.026660	0.020583
February	0.033918	0.032668	0.028694	0.031578	0.029642	0.024224	0.028762	0.026023	0.021209
March	0.031923	0.032861	0.026006	0.029073	0.030255	0.024219	0.026635	0.028083	0.022631
April	0.031832	0.028600	0.024521	0.033868	0.032836	0.027072	0.031028	0.029251	0.023497
May	0.039836	0.040345	0.030636	0.035269	0.034421	0.025065	0.031754	0.029905	0.020457
June	0.084589	0.084532	0.069979	0.071685	0.068874	0.052904	0.064432	0.060088	0.044804
July	0.079186	0.077313	0.056050	0.068940	0.066079	0.050737	0.061809	0.058246	0.041439
August	0.080331	0.080699	0.065254	0.068929	0.067052	0.052405	0.062076	0.058860	0.044228
September	0.082673	0.083918	0.075671	0.066718	0.064139	0.053394	0.061824	0.058139	0.046254
October	0.031611	0.030361	0.025126	0.033523	0.032705	0.029243	0.030010	0.028407	0.024185
November	0.034071	0.028774	0.032796	0.032968	0.031579	0.026602	0.030481	0.028224	0.022780
December	0.032547	0.033151	0.022975	0.031876	0.029846	0.025098	0.029911	0.027204	0.022469

Month	COOK.			DHW			HEAT.		
	3M	4M	11M	3M	4M	11M	3M	4M	11M
January	0.029335	0.028072	0.021931	0.028914	0.026605	0.020530	0.030918	0.034632	0.028109
February	0.030444	0.028181	0.022646	0.029624	0.027128	0.021175	0.033936	0.032692	0.028717
March	0.027954	0.031021	0.025800	0.026900	0.030259	0.024917	0.032333	0.033374	0.026423
April	0.034623	0.033511	0.027992	0.033877	0.032666	0.027083	0.034872	0.031897	0.028295
May	0.035035	0.034118	0.024764	0.034614	0.033575	0.024223	0.031898	0.030089	0.020648
June	0.072717	0.070125	0.054609	0.072634	0.070024	0.056577	0.043387	0.034696	0.015898
July	0.069795	0.067217	0.047024	0.069797	0.066151	0.044496	0.041418	0.034215	0.015898
August	0.070017	0.068352	0.052298	0.069950	0.068273	0.051532	0.041611	0.034412	0.015898
September	0.069062	0.067034	0.056678	0.068093	0.065836	0.055321	0.066915	0.064383	0.053671
October	0.033170	0.032272	0.028720	0.032781	0.031795	0.028691	0.033552	0.032740	0.027396
November	0.032781	0.032064	0.025111	0.032649	0.031565	0.023978	0.034641	0.029296	0.033757
December	0.032272	0.029187	0.026321	0.032145	0.028226	0.025832	0.032552	0.033158	0.022980

Month	OFFICE			VENT		
	3M	4M	11M	3M	4M	11M
January	0.028912	0.029008	0.022823	0.027075	0.027309	0.021202
February	0.030128	0.027775	0.022932	0.028366	0.025517	0.021266
March	0.027659	0.028321	0.022770	0.026315	0.026726	0.021190
April	0.031335	0.029612	0.023893	0.030946	0.029067	0.023391
May	0.033021	0.031531	0.022134	0.032051	0.030286	0.020851
June	0.065832	0.061780	0.045606	0.064034	0.059606	0.043470
July	0.063333	0.060295	0.046200	0.062011	0.058795	0.044294
August	0.063397	0.060440	0.047069	0.062115	0.058907	0.045558
September	0.062184	0.058580	0.046787	0.061305	0.057503	0.045482
October	0.031362	0.030056	0.025896	0.030392	0.028873	0.024566
November	0.031416	0.029112	0.024666	0.029407	0.026561	0.022237
December	0.030371	0.028225	0.022762	0.029943	0.028088	0.022198

FILED  
Missouri Public  
Service Commission  
EO-2018-0211; YE-2019-0133

CANCELLED  
April 1, 2020  
Missouri Public  
Service Commission  
ER-2019-0335; YE-2020-0164

DATE OF ISSUE December 21, 2018

DATE EFFECTIVE January 20, 2019

ISSUED BY Michael Moehn  
NAME OF OFFICER

President  
TITLE

St. Louis, Missouri  
ADDRESS

MO.P.S.C. SCHEDULE NO. 6 1st Revised SHEET NO. 91.21

CANCELLING MO.P.S.C. SCHEDULE NO. 6 Original SHEET NO. 91.21

APPLYING TO MISSOURI SERVICE AREA

RIDER EEIC

ENERGY EFFICIENCY INVESTMENT CHARGE (Cont'd.)  
For MEEIA 2019-21 Plan

TD DETERMINATION (Cont'd.)

The Company shall file an update to NMR rates by month by Service Classification and by end-use category contemporaneous with filing any compliance tariff sheets in any general electric rate case reflecting the rates set in that case, and the billing determinants used in setting rates in such case. Updates to the NMR values shall be calculated following the same process described in the Marginal Rate Analysis section of the MEEIA 2019-21 Plan.

NTGF = Net-To-Gross Factor. For each Program Year, all TD calculations will assume a NTGF of 0.85 until such time as a NTGF is determined through EM&V for that Program Year. Thereafter, for each given Program Year, the NTGF determined through EM&V will be used prospectively starting with the month in which the Earnings Opportunity Award is determined.

Annual kWh savings per Measure will be updated prospectively in the Company's TRM and Deemed Savings Table.

EARNINGS OPPORTUNITY AWARD DETERMINATION

An Earnings Opportunity Award shall be calculated for each Program Year using the EO Calculator submitted with the MEEIA 2019-21 Plan as Appendix N. The Earnings Opportunity Award will not go below zero dollars (\$0). If Commission-approved new programs are added to the Program, the Company may seek Commission approval to have the targets and the cap of the Earnings Opportunity Award adjusted. For each Program Year the Earnings Opportunity Award shall be adjusted for the difference, with carrying cost at the Company's monthly short-term interest rate, between TD revenues billed resulting from the application of the EEIR and what those revenues would have been if:

- (1) The ME used in the calculation were the normalized savings for each Measure at customer meter per Measure determined through EM&V *ex-post* gross analysis for each Program Year, and
- (2) The NTGF used in the calculation was the net-to-gross values determined through EM&V.

\*FILING

The Company shall make a Rider EEIC filing each calendar year to be effective for application to the usage on and after the first date of the subsequent February. The Company is allowed or may be ordered by the Commission to make one other Rider EEIC filing in each calendar year with such subsequent filing to be effective the first day of June or October. Rider EEIC filings shall be made at least 60 days prior to their effective dates.

PRUDENCE REVIEWS

A prudence review shall be conducted no less frequently than at 24-month intervals in accordance with 20 CSR 4240-20.093(11). Any costs which are determined by the Commission to have been imprudently incurred or incurred in violation of the terms of this Rider EEIC shall be addressed through an adjustment in the next EEIR determination and reflected in factor OA herein.

CANCELLED  
December 18, 2020  
Missouri Public  
Service Commission  
EO-2018-0211; YE-2021-0119  
\*Indicates Change.

FILED  
Missouri Public  
Service Commission  
ER-2020-0147; YE-2020-0090

DATE OF ISSUE November 22, 2019 DATE EFFECTIVE ~~January 21, 2020~~ February 1, 2020

ISSUED BY Michael Moehn President St. Louis, Missouri  
NAME OF OFFICER TITLE ADDRESS



MO.P.S.C. SCHEDULE NO. 6 Original SHEET NO. 91.21

CANCELLING MO.P.S.C. SCHEDULE NO. \_\_\_\_\_ SHEET NO. \_\_\_\_\_

APPLYING TO MISSOURI SERVICE AREARIDER EEICENERGY EFFICIENCY INVESTMENT CHARGE (Cont'd.)  
For MEEIA 2019-21 PlanTD DETERMINATION (Cont'd.)

The Company shall file an update to NMR rates by month by Service Classification and by end-use category contemporaneous with filing any compliance tariff sheets in any general electric rate case reflecting the rates set in that case, and the billing determinants used in setting rates in such case. Updates to the NMR values shall be calculated following the same process described in the Marginal Rate Analysis section of the MEEIA 2019-21 Plan.

NTGF = Net-To-Gross Factor. For each Program Year, all TD calculations will assume a NTGF of 0.85 until such time as a NTGF is determined through EM&V for that Program Year. Thereafter, for each given Program Year, the NTGF determined through EM&V will be used prospectively starting with the month in which the Earnings Opportunity Award is determined.

Annual kWh savings per Measure will be updated prospectively in the Company's TRM and Deemed Savings Table.

EARNINGS OPPORTUNITY AWARD DETERMINATION

An Earnings Opportunity Award shall be calculated for each Program Year using the EO Calculator submitted with the MEEIA 2019-21 Plan as Appendix N. The Earnings Opportunity Award will not go below zero dollars (\$0). If Commission-approved new programs are added to the Program, the Company may seek Commission approval to have the targets and the cap of the Earnings Opportunity Award adjusted. For each Program Year the Earnings Opportunity Award shall be adjusted for the difference, with carrying cost at the Company's monthly short-term interest rate, between TD revenues billed resulting from the application of the EEIR and what those revenues would have been if:

- (1) The ME used in the calculation were the normalized savings for each Measure at customer meter per Measure determined through EM&V *ex-post* gross analysis for each Program Year, and
- (2) The NTGF used in the calculation was the net-to-gross values determined through EM&V.

FILING

The Company shall make a Rider EEIC filing each calendar year to be effective for the subsequent calendar year's February billing month. The Company is allowed or may be ordered by the Commission to make one other Rider EEIC filing in each calendar year with such subsequent filing to be effective beginning with either the June or October billing month. Rider EEIC filings shall be made at least 60 days prior to their effective dates.

PRUDENCE REVIEWS

A prudence review shall be conducted no less frequently than at 24-month intervals in accordance with 4 CSR 240-20.093(11). Any costs which are determined by the Commission to have been imprudently incurred or incurred in violation of the terms of this Rider EEIC shall be addressed through an adjustment in the next EEIR determination and reflected in factor OA herein.

FILED  
Missouri Public  
Service Commission  
EO-2018-0211; YE-2019-0133

CANCELLED  
February 1, 2020  
Missouri Public  
Service Commission

ER-2020-0147; YE-2020-0090

DATE OF ISSUE December 21, 2018 DATE EFFECTIVE January 20, 2019  
ISSUED BY Michael Moehn President St. Louis, Missouri  
NAME OF OFFICER TITLE ADDRESS

MO.P.S.C. SCHEDULE NO. 6 2nd Revised SHEET NO. 91.22

CANCELLING MO.P.S.C. SCHEDULE NO. 6 1st Revised SHEET NO. 91.22

APPLYING TO MISSOURI SERVICE AREA

**RIDER EEIC**

**ENERGY EFFICIENCY INVESTMENT CHARGE (Cont'd.)**

\* (Applicable To Service Provided Beginning June 2019 through January 31, 2020)

**MEEIA 2013-15 EEIR Components (Applicable to MEEIA Cycle 1 Plan)**

Service Class	NPC/PE (\$/kWh)	NTD/PE (\$/kWh)	NPI/PE (\$/kWh)	NOA/PE (\$/kWh)
1 (M)-Residential Service	\$0.000000	\$0.000000	\$0.000039	\$0.000000
2 (M)-Small General Service	\$0.000000	\$0.000000	\$0.000055	\$0.000000
3 (M)-Large General Service	\$0.000000	\$0.000000	\$0.000112	\$0.000000
4 (M)-Small Primary Service	\$0.000000	\$0.000000	\$0.000094	\$0.000000
11 (M)-Large Primary Service	\$0.000000	\$0.000000	\$0.000185	\$0.000000
12 (M)-Large Transmission Service	\$0.000000	\$0.000000	\$0.000000	\$0.000000

**MEEIA 2016-18 EEIR Components (Applicable to MEEIA Cycle 2 Plan)**

Service Class	NPC/PE (\$/kWh)	NTD/PE (\$/kWh)	NEO/PE (\$/kWh)	NOA/PE (\$/kWh)
1 (M)-Residential Service	(\$0.000614)	\$0.001109	\$0.000000	\$0.000005
2 (M)-Small General Service	\$0.000580	\$0.002301	\$0.000000	(\$0.000002)
3 (M)-Large General Service	\$0.000584	\$0.001802	\$0.000000	(\$0.000002)
4 (M)-Small Primary Service	\$0.000598	\$0.001492	\$0.000000	(\$0.000002)
11 (M)-Large Primary Service	\$0.000687	\$0.000648	\$0.000000	(\$0.000002)
12 (M)-Large Transmission Service	\$0.000000	\$0.000000	\$0.000000	\$0.000000

**MEEIA 2019-21 EEIR Components (Applicable to MEEIA Cycle 3 Plan)**

Service Class	NPC/PE (\$/kWh)	NTD/PE (\$/kWh)	NEO/PE (\$/kWh)	NOA/PE (\$/kWh)
1 (M)-Residential Service	\$0.003679	\$0.000357	\$0.000000	\$0.000000
2 (M)-Small General Service	\$0.002247	\$0.000239	\$0.000000	\$0.000000
3 (M)-Large General Service	\$0.002247	\$0.000181	\$0.000000	\$0.000000
4 (M)-Small Primary Service	\$0.002247	\$0.000179	\$0.000000	\$0.000000
11 (M)-Large Primary Service	\$0.002247	\$0.000065	\$0.000000	\$0.000000
12 (M)-Large Transmission Service	\$0.000000	\$0.000000	\$0.000000	\$0.000000

**Summary EEIR Components and Total EEIR**

Service Class	NPC (\$/kWh)	NTD (\$/kWh)	(NEO+NPI) (\$/kWh)	NOA (\$/kWh)	Total EEIR (\$/kWh)
1 (M)-Residential Service	\$0.003065	\$0.001466	\$0.000039	\$0.000005	\$0.004575
2 (M)-Small General Service	\$0.002827	\$0.002540	\$0.000055	(\$0.000002)	\$0.005420
3 (M)-Large General Service	\$0.002831	\$0.001983	\$0.000112	(\$0.000002)	\$0.004924
4 (M)-Small Primary Service	\$0.002845	\$0.001671	\$0.000094	(\$0.000002)	\$0.004608
11 (M)-Large Primary Service	\$0.002934	\$0.000713	\$0.000185	(\$0.000002)	\$0.003830
12 (M)-Large Transmission Service	\$0.000000	\$0.000000	\$0.000000	\$0.000000	\$0.000000

\*Indicates Change.

CANCELLED  
December 18, 2020  
Missouri Public  
Service Commission  
EO-2018-0211; YE-2021-0119

DATE OF ISSUE November 22, 2019

DATE EFFECTIVE January 27, 2020  
~~January 21, 2020~~

ISSUED BY Michael Moehn President Missouri Public Service Commission St. Louis, Missouri  
NAME OF OFFICER TITLE ADDRESS  
ER-2020-0147; YE-2020-0090

MO.P.S.C. SCHEDULE NO. 6 1st Revised SHEET NO. 91.22

CANCELLING MO.P.S.C. SCHEDULE NO. 6 Original SHEET NO. 91.22

APPLYING TO MISSOURI SERVICE AREA

**RIDER EEIC**

**ENERGY EFFICIENCY INVESTMENT CHARGE (Cont'd.)**

(Applicable To Determination of EEIR Beginning June 2019 through the Billing Month of January 2020)

**\*MEEIA 2013-15 EEIR Components (Applicable to MEEIA Cycle 1 Plan)**

Service Class	NPC/PE (\$/kWh)	NTD/PE (\$/kWh)	NPI/PE (\$/kWh)	NOA/PE (\$/kWh)
1 (M)-Residential Service	\$0.000000	\$0.000000	\$0.000039	\$0.000000
2 (M)-Small General Service	\$0.000000	\$0.000000	\$0.000055	\$0.000000
3 (M)-Large General Service	\$0.000000	\$0.000000	\$0.000112	\$0.000000
4 (M)-Small Primary Service	\$0.000000	\$0.000000	\$0.000094	\$0.000000
11 (M)-Large Primary Service	\$0.000000	\$0.000000	\$0.000185	\$0.000000
12 (M)-Large Transmission Service	\$0.000000	\$0.000000	\$0.000000	\$0.000000

**\*MEEIA 2016-18 EEIR Components (Applicable to MEEIA Cycle 2 Plan)**

Service Class	NPC/PE (\$/kWh)	NTD/PE (\$/kWh)	NEO/PE (\$/kWh)	NOA/PE (\$/kWh)
1 (M)-Residential Service	(\$0.000614)	\$0.001109	\$0.000000	\$0.000005
2 (M)-Small General Service	\$0.000580	\$0.002301	\$0.000000	(\$0.000002)
3 (M)-Large General Service	\$0.000584	\$0.001802	\$0.000000	(\$0.000002)
4 (M)-Small Primary Service	\$0.000598	\$0.001492	\$0.000000	(\$0.000002)
11 (M)-Large Primary Service	\$0.000687	\$0.000648	\$0.000000	(\$0.000002)
12 (M)-Large Transmission Service	\$0.000000	\$0.000000	\$0.000000	\$0.000000

**\*\*MEEIA 2019-21 EEIR Components (Applicable to MEEIA Cycle 3 Plan)**

Service Class	NPC/PE (\$/kWh)	NTD/PE (\$/kWh)	NEO/PE (\$/kWh)	NOA/PE (\$/kWh)
1 (M)-Residential Service	\$0.003679	\$0.000357	\$0.000000	\$0.000000
2 (M)-Small General Service	\$0.002247	\$0.000239	\$0.000000	\$0.000000
3 (M)-Large General Service	\$0.002247	\$0.000181	\$0.000000	\$0.000000
4 (M)-Small Primary Service	\$0.002247	\$0.000179	\$0.000000	\$0.000000
11 (M)-Large Primary Service	\$0.002247	\$0.000065	\$0.000000	\$0.000000
12 (M)-Large Transmission Service	\$0.000000	\$0.000000	\$0.000000	\$0.000000

**\*\*Summary EEIR Components and Total EEIR**

Service Class	NPC (\$/kWh)	NTD (\$/kWh)	(NEO+NPI) (\$/kWh)	NOA (\$/kWh)	Total EEIR (\$/kWh)
1 (M)-Residential Service	\$0.003065	\$0.001466	\$0.000039	\$0.000005	\$0.004575
2 (M)-Small General Service	\$0.002827	\$0.002540	\$0.000055	(\$0.000002)	\$0.005420
3 (M)-Large General Service	\$0.002831	\$0.001983	\$0.000112	(\$0.000002)	\$0.004924
4 (M)-Small Primary Service	\$0.002845	\$0.001671	\$0.000094	(\$0.000002)	\$0.004608
11 (M)-Large Primary Service	\$0.002934	\$0.000713	\$0.000185	(\$0.000002)	\$0.003830
12 (M)-Large Transmission Service	\$0.000000	\$0.000000	\$0.000000	\$0.000000	\$0.000000

\*Indicates Reissue. \*\*Indicates Change.

DATE OF ISSUE March 25, 2019 DATE EFFECTIVE May 25, 2019

ISSUED BY Michael Moehn <sup>CANCELLED</sup> January 27, 2020 <sup>FILED</sup> President St. Louis, Missouri  
NAME OF OFFICER Service Commission TITLE Service Commission ADDRESS  
ER-2020-0147; YE-2020-0090 ER-2019-0291; YE-2019-0172

MO.P.S.C. SCHEDULE NO. 6

Original

SHEET NO. 91.22

CANCELLING MO.P.S.C. SCHEDULE NO. \_\_\_\_\_

SHEET NO. \_\_\_\_\_

APPLYING TO MISSOURI SERVICE AREA

**RIDER EEIC**

**ENERGY EFFICIENCY INVESTMENT CHARGE (Cont'd.)**

(Applicable To Determination of EEIR Beginning February, 20XX through the Billing Month of January 20XX)

**MEEIA 2016-18 EEIR Components (Applicable to MEEIA Cycle 2 Plan)**

Service Class	NPC/PE (\$/kWh)	NTD/PE (\$/kWh)	NEO/PE (\$/kWh)	NOA/PE (\$/kWh)
1 (M)-Residential Service	\$0.000000	\$0.000000	\$0.000000	\$0.000000
2 (M)-Small General Service	\$0.000000	\$0.000000	\$0.000000	\$0.000000
3 (M)-Large General Service	\$0.000000	\$0.000000	\$0.000000	\$0.000000
4 (M)-Small Primary Service	\$0.000000	\$0.000000	\$0.000000	\$0.000000
11 (M)-Large Primary Service	\$0.000000	\$0.000000	\$0.000000	\$0.000000
12 (M)-Large Transmission Service	\$0.000000	\$0.000000	\$0.000000	\$0.000000

**MEEIA 2019-21 EEIR Components (Applicable to MEEIA Cycle 3 Plan)**

Service Class	NPC/PE (\$/kWh)	NTD/PE (\$/kWh)	NEO/PE (\$/kWh)	NOA/PE (\$/kWh)
1 (M)-Residential Service	\$0.000000	\$0.000000	\$0.000000	\$0.000000
2 (M)-Small General Service	\$0.000000	\$0.000000	\$0.000000	\$0.000000
3 (M)-Large General Service	\$0.000000	\$0.000000	\$0.000000	\$0.000000
4 (M)-Small Primary Service	\$0.000000	\$0.000000	\$0.000000	\$0.000000
11 (M)-Large Primary Service	\$0.000000	\$0.000000	\$0.000000	\$0.000000
12 (M)-Large Transmission Service	\$0.000000	\$0.000000	\$0.000000	\$0.000000

**Summary EEIR Components and Total EEIR**

Service Class	NPC (\$/kWh)	NTD (\$/kWh)	(NEO+NPI) (\$/kWh)	NOA (\$/kWh)	Total EEIR (\$/kWh)
1 (M)-Residential Service	\$0.000000	\$0.000000	\$0.000000	\$0.000000	\$0.000000
2 (M)-Small General Service	\$0.000000	\$0.000000	\$0.000000	\$0.000000	\$0.000000
3 (M)-Large General Service	\$0.000000	\$0.000000	\$0.000000	\$0.000000	\$0.000000
4 (M)-Small Primary Service	\$0.000000	\$0.000000	\$0.000000	\$0.000000	\$0.000000
11 (M)-Large Primary Service	\$0.000000	\$0.000000	\$0.000000	\$0.000000	\$0.000000
12 (M)-Large Transmission Service	\$0.000000	\$0.000000	\$0.000000	\$0.000000	\$0.000000

CANCELLED  
May 25, 2019  
Missouri Public  
Service Commission  
ER-2019-0291; YE-2019-0172

DATE OF ISSUE December 21, 2018

DATE EFFECTIVE January 20, 2019

ISSUED BY Michael Moehn  
NAME OF OFFICER

President  
TITLE

FILED  
Missouri Public  
Service Commission  
EO-2018-0211; YE-2019-0133

St. Louis, Missouri  
ADDRESS

MO.P.S.C. SCHEDULE NO. 6

Original

SHEET NO. 91.23

CANCELLING MO.P.S.C. SCHEDULE NO. \_\_\_\_\_

SHEET NO. \_\_\_\_\_

APPLYING TO \_\_\_\_\_

MISSOURI SERVICE AREARIDER EEICENERGY EFFICIENCY INVESTMENT CHARGE (Cont'd.)

(Applicable To Service Provided Beginning February 1, 2020 through January 31, 2021)

MEEIA 2016-18 EEIR Components (Applicable to MEEIA Cycle 2 Plan)

Service Class	NPC/PE (\$/kWh)	NTD/PE (\$/kWh)	NEO/PE (\$/kWh)	NOA/PE (\$/kWh)
1 (M) -Residential Service	\$0.000126	\$0.000108	\$0.000822	\$0.000000
2 (M) -Small General Service	\$0.000112	\$0.000321	\$0.000806	\$0.000000
3 (M) -Large General Service	\$0.000043	\$0.000556	\$0.000833	\$0.000000
4 (M) -Small Primary Service	(\$0.000006)	\$0.000541	\$0.000862	\$0.000000
11 (M) -Large Primary Service	(\$0.000182)	\$0.000481	\$0.000995	\$0.000000
12 (M) -Large Transmission Service	\$0.000000	\$0.000000	\$0.000000	\$0.000000

MEEIA 2019-21 EEIR Components (Applicable to MEEIA Cycle 3 Plan)

Service Class	NPC/PE (\$/kWh)	NTD/PE (\$/kWh)	NEO/PE (\$/kWh)	NOA/PE (\$/kWh)
1 (M) -Residential Service	\$0.002501	\$0.000389	\$0.000000	\$0.000000
2 (M) -Small General Service	\$0.002225	\$0.000279	\$0.000000	\$0.000000
3 (M) -Large General Service	\$0.002226	\$0.000181	\$0.000000	\$0.000000
4 (M) -Small Primary Service	\$0.002249	\$0.000174	\$0.000000	\$0.000000
11 (M) -Large Primary Service	\$0.002314	\$0.000237	\$0.000000	\$0.000000
12 (M) -Large Transmission Service	\$0.000000	\$0.000000	\$0.000000	\$0.000000

Summary EEIR Components and Total EEIR

Service Class	NPC (\$/kWh)	NTD (\$/kWh)	(NEO+NPI) (\$/kWh)	NOA (\$/kWh)	Total EEIR (\$/kWh)
1 (M) -Residential Service	\$0.002627	\$0.000497	\$0.000822	\$0.000000	\$0.003946
2 (M) -Small General Service	\$0.002337	\$0.000600	\$0.000806	\$0.000000	\$0.003743
3 (M) -Large General Service	\$0.002269	\$0.000737	\$0.000833	\$0.000000	\$0.003839
4 (M) -Small Primary Service	\$0.002243	\$0.000715	\$0.000862	\$0.000000	\$0.003820
11 (M) -Large Primary Service	\$0.002132	\$0.000718	\$0.000995	\$0.000000	\$0.003845
12 (M) -Large Transmission Service	\$0.000000	\$0.000000	\$0.000000	\$0.000000	\$0.000000

DATE OF ISSUE January 15, 2020DATE EFFECTIVE February 1, 2020~~March 15, 2020~~ISSUED BY Martin J. Lyons  
NAME OF OFFICERChairman & President Missouri Public St. Louis, Missouri  
TITTLE Service Commission ADDRESS

ER-2020-0147; YE-2020-0090

**ADDENDUM C**

**HAS BEEN DEEMED**

**CONFIDENTIAL**

**IN ITS ENTIRETY**

**ADDENDUM D**

**HAS BEEN DEEMED**

**CONFIDENTIAL**

**IN ITS ENTIRETY**