

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

In the Matter of the Application of Union)
Electric Company d/b/a Ameren Missouri for)
Approval of Efficient Electrification Program) **File No. ET-2021-0020**

STAFF RECOMMENDATION

COMES NOW the Staff of the Missouri Public Service Commission, by and through the undersigned counsel, and states it has reviewed the revised tariffs, and as outlined in the attached memorandum, recommends the following tariff sheets be approved for service on or after May 28, 2022.

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

1st Revised Sheet No. 164.5, Cancelling Original Sheet No. 164.5

1st Revised Sheet No. 164.6, Cancelling Original Sheet No. 164.6

Respectfully submitted,

/s/ Nicole Mers

Nicole Mers

Deputy Counsel

Missouri Bar No. 66766

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**Attorney for the Staff of the
Missouri Public Service Commission**

CERTIFICATE OF SERVICE

I hereby certify that copies of the foregoing have been emailed to all parties and/or counsel of record on this 13th day of May, 2022.

/s/ Nicole Mers

MEMORANDUM

TO: Missouri Public Service Commission Official Case File
File No. ET-2021-0020 and Tariff Tracking No. YE-2022-0251

FROM: Joseph P. Roling, Economics Analyst, Tariff/Rate Design

/s/ Joseph P. Roling / 05-13-22 /s/ Nicole Mers / 05-13-22
Tariff/Rate Design/ Date Staff Counsel's Office / Date

SUBJECT: Staff Recommendation to Approve Union Electric Company, d/b/a Ameren Missouri Proposed Tariff Sheets for approval of Efficient Electrification Program effective May 28, 2022.

DATE: May 13, 2022

Ameren Missouri Operations Filing

On March 10, 2021, the Commission approved a Unanimous Stipulation and Agreement allowing Union Electric Company d/b/a Ameren Missouri ("Ameren Missouri") to establish an efficient electrification pilot program. The Commission approved Tariff No. YE-2021-0194¹ to implement the pilot program.

On April 28, 2022, Ameren Missouri filed with the Commission two (2) tariff sheets², Tariff No. YE-2022-0251, which bears an effective date of May 28, 2022. The filing letter, which accompanied the tariff filing, states that the proposed tariff sheets implement paragraph 11 (Reporting Requirements) of the Stipulation and Agreement approved in this case. One specific follow up item is a requirement of the Stipulation and Agreement (Paragraph 11, bullet 5, found on page 5 that states:

“To the extent allowed by the available equipment and associated data, an analysis of any correlation of equipment usage with customer billing demands, system coincident peak loads as well as non-coincident peak loads, including equipment impact on customer loads during peak and off-peak periods.

- Within 30 days of the Commission's approval of this Stipulation, Ameren Missouri will communicate to Staff, OPC, and Renew Missouri the technical capabilities and associated costs related to the capture of equipment load data and customer load data.
- Based on that information, the Company, Staff, OPC, and Renew Missouri will determine what data, if any, can and will be provided to Staff, OPC, and Renew Missouri.

¹ Effective May 30, 2021.

² MO. P.S.C. Schedule No. 6, 1st Revised Sheet No. 164.5, cancelling Original Sheet No. 164.5.
MO. P.S.C. Schedule No. 6, 1st Revised Sheet No. 164.6, cancelling Original Sheet No. 164.6.

- If the acquisition of equipment that facilitates retention of charging data exceeds the cost of similar equipment by more than \$50, the Signatories will support a reasonably revised tariff increasing the incentives by an amount in the range of \$50 - \$500, with the overall budget remaining the same.”

In order to comply with this requirement, Ameren Missouri added the language below to the tariff.

To increase knowledge of how efficient electrification measures impact the electric grid, the Company encourages customers to include data acquisition options in their purchase. If such capability is available but is not included in the standard equipment purchase, the Company may provide an additional incentive to cover documented costs of equipment and data acquisition processes of up to \$500 to the incentives listed in the table below. Customers receiving the additional incentive for data acquisition will be required to provide agreed-upon data as requested and documented by the Company through the application process.

Ameren Missouri stated that the revision listed above was consistent with the Stipulation and Agreement approved in case ET-2021-0020.

It should be noted that the 30 day timeline referenced above was not met by Ameren Missouri.

Ameren Missouri stated that “while the 30-day requirement in this section is long overdue, please note that to-date there have been no applications for this program and, therefore, no potential loss of load data collection opportunities. The program opened in August 2021 and has been available to customers via the Ameren Missouri website since that time. Marketing efforts have just begun to ramp up for the incentives under this program.”³ Additionally, Ameren Missouri shared the proposed tariff sheets with Staff and OPC prior to filing.

The Commission issued its *Order Directing Staff Recommendation* on April 28, 2022, which directed Staff to file its recommendation no later than May 13, 2022, at 11:00 a.m. The Commission directed Staff to inform the Commission of whether the Company’s tariff revision complies with both the Commission’s order as well as the approved Stipulation and Agreement and set a time for other parties to comment.

Staff Recommendation

Staff has reviewed documents provided by Ameren, namely the quote on cost for data acquisition and output report (EPS Data quote and Full Cycle Report) and has verified that the revised tariff increasing the incentives is less than the \$500 threshold established in the Stipulation and Agreement, with the overall budget remaining the same. Based on the responses from Ameren Missouri, no data loss

³ Quoted in Email from Patrick Justis PE, Manager Efficient Electrification Development on 3/29/22 to PSC, OPC & Renew MO Staff.

resulted from Ameren Missouri missing the 30 day timeline referenced above, so Staff does not object to the delay in this instance. Aside from this delay, Staff agrees that the Efficient Electrification program tariffs are in compliance with the Stipulation and Agreement and the Commission Order.

The Commission Staff's Tariff/Rate Design Department has reviewed the filed tariff sheets and recommends the Commission issue an order approving the following tariff sheets, as filed on April 28, 2022, for service on and after May 28, 2022, the requested effective date:

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

1st Revised Sheet No. 164.5, Cancelling Original Sheet No. 164.5

1st Revised Sheet No. 164.6, Cancelling Original Sheet No. 164.6

Staff has verified that Ameren Missouri is not delinquent on any assessment and has filed its Annual Report. Ameren Missouri is current on its submission of its Quarterly Surveillance Monitoring reports as required in 20 CSR 240-20.090(10). Staff is not aware of any other matter before the Commission that affects or is affected by this filing.

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Electric Company d/b/a Ameren Missouri)
for Approval of Efficient Electrification)
Program

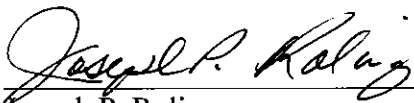
File No. ET-2021-0020
Tariff No. YE-2022-0251

AFFIDAVIT OF JOSEPH P. ROLING

STATE OF MISSOURI)
) ss.
COUNTY OF COLE)

COMES NOW Joseph P. Roling, and on his oath declares that he is of sound mind and lawful age, that he reviewed the facts contained within the foregoing *Staff Recommendation in Memorandum form*; and that the same is true and correct according to his best knowledge and belief.

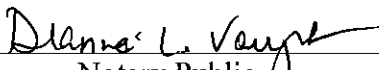
Further the Affiant sayeth not.



Joseph P. Roling

JURAT

Subscribed and sworn before me, a duly constituted and authorized Notary Public, in and for the County of Cole, State of Missouri, at my office in Jefferson City, on this 13th day of May, 2022.



Notary Public

