

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

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

**REQUEST TO REVISE**  
**TECHNICAL RESOURCE MANUAL AND DEEMED SAVINGS TABLE**  
**AND MOTION FOR EXPEDITED TREATMENT**

COMES NOW Union Electric Company d/b/a Ameren Missouri (“Ameren Missouri” or “Company”), and submits this *Request to Revise Technical Resource Manual and Deemed Savings Table and Motion for Expedited Treatment* (“Request”) to the Missouri Public Service Commission (“Commission”) for approval. In support thereof, the Company respectfully states as follows:

1. On October 25, 2018, Ameren Missouri and certain other parties to this proceeding submitted an unopposed *Stipulation and Agreement* (“Agreement”) to the Commission for approval. After receiving no objections, the Commission issued its *Order Approving Non-Unanimous Stipulation and Agreement and Granting Waivers* on December 5, 2018. That *Agreement* included the submission of a revised *Ameren Missouri 2019-21 MEEIA Energy Efficiency Plan* (“Report”) and its associated Appendices A through N.

2. In approving the *Agreement*, the Commission also approved a Company-specific Technical Resource Manual (“TRM”) (Appendices G, H, and I to the *Report*) and Deemed Savings Table (Appendix F to the *Report*). The TRM serves as the source for measure savings formulas and default inputs to use in the absence of utility-specific evaluation results. The TRM, and certain updates thereto, are also used to calculate throughput disincentive on a prospective basis, subject

to DSIM true-up provisions.<sup>1</sup> The Deemed Savings Table represents the application of the formulas in the TRM for discrete measures that are being offered, and also reflect the inputs into those formulas based on utility-specific evaluation results. Accordingly, revisions to the TRM can necessitate revisions to the Deemed Savings Table.

3. Ameren Missouri's 2019-21 Energy Efficiency Plan (currently “MEEIA 2019-23”) anticipates a dynamic TRM with annual updates responsive to evaluation, measurement, and verification (“EM&V”) results. See Ameren Missouri's *Report* submitted as part of the *Agreement* on October 25, 2018, at pages 40 – 41 for more information regarding this process. Ameren Missouri previously requested revisions to the TRM and Deemed Savings tables, and the Commission approved the same, on six prior occasions:

<b>Table 1 – Prior TRM and Deemed Savings Table Updates</b>	
<b>Date Revisions Requested</b>	<b>Data Approved by Commission</b>
December 31, 2018	February 27, 2019
November 15, 2019	December 11, 2019
June 19, 2020	July 8, 2020
October 16, 2020 <sup>2</sup>	November 12, 2020
September 15, 2021	September 29, 2021
September 27, 2022	October 12, 2022

4. It is important that the TRM always reflects current information available based on final program evaluations and current program implementation objectives. Consistent with prior filings, Ameren Missouri has identified several revisions to the TRM and the Deemed Savings Tables that are appropriate for the program year beginning 2024. The primary focus of this TRM update is to include the final evaluated results from the 2022 program year. The measure changes

<sup>1</sup> “Demand-side Investment Mechanism.”

<sup>2</sup> A correction to the filing was made on October 29, 2020.

have been analyzed for cost effectiveness and the goals of the portfolio will not be adjusted.

Updates include the following:

- A table was added to the "Measure Index tab" in Appendix F to calculate a weighted average savings for HVAC measures that have an "Early Replacement" and "Replace on Fail" version of the same measure.
- Residential and Business lighting baselines were updated to align with EISA policy of a 45 lumen/watt efficiency effective 8/1/2023.
- HVAC baselines for heat pumps were updated to CFR standards, with a TRM effective date of 1/1/2024.
- Deemed incremental costs of light bulbs were updated to reflect first year cost per bulb.
- Pay As You Save<sup>®</sup> (PAYS<sup>®</sup>) program specific measures were added with In-Service Rates developed from the PY2022 evaluation and tracking data.
- A default building code of IECC 2012 (through 12/31/2023) and IECC 2015 (effective 1/1/2024) was added for any custom project where local code is not defined and updated commercial HVAC Chiller, ASHP, and Unitary equipment baselines to reflect IECC 2015 building codes effective 1/1/2024.
- A new section was added to better define climate zones by county to Appendix G.
- The "24/7 lighting" coincidence factor was renamed "exterior 24/7 lighting" in Appendix H, since 24/7 interior lighting (e.g., exit signs) falls within the indoor lighting coincidence factor.

- Two new business measures were added to Appendix F covering VSD Air Compressor for units between 40 and 200-hp.
- A Multi-Family version of a water heater wrap measure was added to the Income Eligible tab and a handheld showerhead measure to the Multi-Family Market Rate tab in Appendix F.
- Placeholders were added for potential Winter demand Response measures, Water heater switches, and EV chargers to Appendix F.

Certain clean-up items, including formatting and terminology that does not impact associated measure savings/cost values such as updating Refrigeration RES Coincident Peak Factor in the Deemed Savings Table "CP Factors" tab to match the factor in Appendix G and correcting a few instances where Household Factor either was or was not being applied appropriately to an Air Source Heat Pump capacity size in the "HVAC" tab. The Household Factor adjusts a capacity of a Single-Family unit downward to an appropriate level for a Multifamily unit, where actual data is not available. A description of these revisions and their rationale are included in Attachment 1 to this *Request*. These revisions apply to all measure groups and reflect the input and review of the evaluation contractor. The PY2022 results are sourced from the relevant PY2022 Evaluation Reports as provided by the evaluation contractor, Opinion Dynamics.

Ameren Missouri provided these proposed revisions to Commission Staff on September 14, 2023. Commission Staff provided communication to Ameren Missouri that based on their review to date, they do not have any concerns at this time. Additionally, the implementation team and the evaluators aided in gathering the data and documents used by the Company, and have been provided with these resulting updates. The measure changes have undergone a cost effectiveness analysis, and will not require any adjustment of the portfolio's goals.

5. Ameren Missouri therefore offers a revised TRM and Deemed Savings Table for the Commission's approval. The revisions are found and explained in the attachments referenced in the following Table 2:

<b>Table 2</b>	
<b>List of Attachments Encompassing Revisions to TRM and Deemed Savings Table</b>	
<b>Name</b>	<b>Description</b>
Appendix F – Deemed Savings Table	Clean copy of revised Deemed Savings Table in PDF format
Appendix F - Deemed Savings Table_Clean	Clean copy of revised Deemed Savings Table in executable Excel format
Appendix F - Deemed Savings Table_Redline	Redlined copy of Deemed Savings Table in Excel format
Appendix G – TRM-Vol 1_Overview and User Guide_Clean	Clean copy of revised Appendix G – TRM Volume 1 – Overview and User Guide
Appendix G – TRM-Vol 1_Overview and User Guide_Redline	Redlined version of revised Appendix G - TRM Volume 1 – Overview and User Guide to illustrate location of revisions
Appendix H – TRM-Vol 2_Business Measures_Clean	Clean copy of revised Appendix H – TRM Volume 2 – C&I Measures - Business
Appendix H – TRM-Vol 2_Business Measures_Redline	Redlined version of revised Appendix H - TRM Volume 2 – C&I Measures - Business to illustrate location of revisions
Appendix I – TRM-Vol 3_Residential Measures_Clean	Clean copy of revised Appendix I – TRM Volume 3 - Residential
Appendix I – TRM-Vol 3_Residential Measures_Redline	Redlined version of revised Appendix I - TRM Volume 3 – Residential to illustrate location of revisions

6. Finally, Ameren Missouri requests expedited treatment of this *Request*. Ameren Missouri filed this petition as soon as it could be filed. The request is being filed after consultation

with and feedback from stakeholders and earlier than the requested implementation date of January 1, 2024. The Company requests approval on or about November 1, 2023, so that these revisions can go into effect with the next applicable program year beginning January 1, 2024. This time is necessary to update relevant data tracking and reporting systems prior to the January 1, 2024, program year. The January 1, 2024 effective date is necessary to align program tracking data and program evaluation data and ensures that prospective throughput disincentive funds are collected using the most current and accurate savings estimate.

**WHEREFORE**, Ameren Missouri requests the Commission issue an order approving the proposed revisions to the TRM (Appendix G, H and Appendix I) and Deemed Savings Table (Appendix F) in an expedited manner so that the revised TRM provisions may go into effect on January 1, 2024.

Respectfully submitted,

*/s/ Jennifer S. Moore*

**Jennifer S. Moore**, MO Bar #75056

Senior Corporate Counsel

**Wendy K. Tatro**, MO Bar #60261

Director and Assistant General Counsel

1901 Chouteau Avenue, MC-1310

St. Louis, Missouri 63103

Telephone: (314) 554-3484

Facsimile: (314) 554-4014

[AmerenMOService@ameren.com](mailto:AmerenMOService@ameren.com)

**Attorneys for Union Electric Company**

**d/b/a Ameren Missouri**

**CERTIFICATE OF SERVICE**

I do hereby certify that a true and correct copy of the foregoing document has been hand-delivered, transmitted by e-mail, or mailed, First Class, postage prepaid, this 5<sup>th</sup> day of October, 2023, to counsel for all parties on the Commission's service list in this case.

*/s/ Jennifer S. Moore*  
Jennifer S. Moore