

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

In the Matter of Union Electric Company)
d/b/a Ameren Missouri's Electric Tariffs) **File No. ER-2024-0187**
Adjustment Relating to MEEIA EEIC Rider) Tracking No. JE-2024-0086

STAFF'S RECOMMENDATION TO APPROVE TARIFF SHEET

COMES NOW the Staff of the Missouri Public Service Commission ("Staff"), by and through the undersigned counsel, and for its *Staff Recommendation* respectfully states:

1. On December 1, 2023, Union Electric Company d/b/a Ameren Missouri ("Ameren Missouri" or "Company"), filed one revised tariff sheet that takes effect on or before February 1, 2024. The revised tariff adjusts the Company's Missouri Energy Efficiency Investment Act ("MEEIA") Rider EEIC rates. The Company's filing included J. Neil Graser's *Direct Testimony*.

2. In its *Order* on December 4, 2023, the Commission ordered Staff to file a recommendation in this case no later than December 29, 2023.

3. Ameren Missouri requested that the Commission grant its request to adjust its Rider EEIC rates in Tariff No. JE-2024-0086. Ameren Missouri's proposed Rider EEIC rate will collect approximately \$95.5 million.¹ On average, the residential change under Rider EEIC will decrease by about 2.54% or \$0.09 per month per 1,000 kWh. Rider EEIC business rates will differ by class as a result of customer opt-outs, incentives, and projected costs that are further detailed in the Staff's Memorandum.

4. Staff conducted a review of the Company's tariff revisions² and accompanying testimony. Based on the limited review Staff could complete in the 30 day timeframe dictated by

¹ Ameren Missouri's filing proposes to decrease the MEEIA revenue requirement from \$101.8 million to \$95.5 million.

² Commission Rule 20 CSR 4240-20.093(4), requires the Commission's Staff perform an examination of the information provided by Ameren Missouri and determine if the proposed adjustments are in accordance with Section 393.1075, RSMo 2016, and applicable regulations.

20 CSR 4240-20.093(4)(B), Staff believes the Company complied with Section 393.1075, RSMo 2016, and applicable regulations in calculating the DSIM rate. Staff's recommendation for approval of the EEIC Rider rate changes in this case are solely based on the accuracy of Ameren Missouri's calculations and is not indicative of prudence. Staff recommends that the Commission issue an order approving the tariff sheet below, as filed on December 1, 2023, for service on and after February 1, 2024, the Company's requested effective date:

P.S.C. MO. No. 6

Fifth Revised Sheet No. 91.23 cancelling the Fourth Revised Sheet No. 91.23

5. Attached hereto and incorporated herein by reference is Staff's Recommendation, in which Staff recommends the Commission approve the following tariff sheet. Staff verified that Ameren Missouri is not delinquent on any assessment and has filed its Annual Report.³ Staff is not aware of any other matter before the Commission that affects or is affected by this filing.

WHEREFORE, Staff recommends the Commission issue an order approving the following proposed tariff sheet, to become effective by February 1, 2024, as requested by Ameren Missouri; and grant such other and further relief as is just in the circumstances.

P.S.C. MO. No. 6

Fifth Revised Sheet No. 91.23 cancelling the Fourth Revised Sheet No. 91.23

Respectfully submitted,

/s/ Eric Vandergriff

Eric Vandergriff

Legal Counsel

Missouri Bar No. 73984

P.O. Box 360

Jefferson City, MO 65102

573-522-9524 (Voice)

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Attorney for the Staff of the
Missouri Public Service Commission

³ Commission Rule 20 CSR 4240-20.093(D), requires the utility to be current on its submission of its annual reports in order to increase the DSIM rates.

CERTIFICATE OF SERVICE

I hereby certify that copies of the foregoing have been mailed or hand-delivered, transmitted by facsimile or electronically mailed to all parties and/or counsel of record on this 28th day of December, 2023.

/s/ Eric Vandergriff

MEMORANDUM

TO: Missouri Public Service Commission Official Case File
Case No. ER-2024-0187, Tariff Tracking No. JE-2024-0086

FROM: Marina Stever, Senior Research/Data Analyst,
Tariff/Rate Design Department
Krishna L. Poudel, PhD, Economist, Energy Resources Dept.

/s/ Marina Stever 12-28-2023
Tariff/Rate Design Dept. / Date

SUBJECT: Staff Recommendation To Approve Union Electric Company,
d/b/a Ameren Missouri's ("Ameren Missouri") Proposed Tariff Sheet(s)
for its Rider Energy Efficiency Investment Charge ("Rider EEIC")

DATE: December 28, 2023

AMEREN MISSOURI FILING

On December 1, 2023, Ameren Missouri filed, with the Commission, one tariff sheet to be an effective on and after February 1, 2024. The tariff changes adjust the Missouri Energy Efficiency Investment Act ("MEEIA") Rider EEIC rates. Ameren Missouri's filing also included the Direct Testimony of J. Neil Graser. As filed, Ameren Missouri's overall Rider EEIC rate will collect approximately \$95.5 million.¹

BACKGROUND

The total proposed Rider EEIC rates are the sum of the remaining MEEIA 2016-18 Energy Efficiency Investment Rate ("EEIR") Components (MEEIA Cycle 2) and the currently effective MEEIA 2019-21 EEIR Components (MEEIA Cycle 3). Additionally, the total Rider EEIC rates also include a small portion of forecasted program costs and throughput disincentive for the extended MEEIA Cycle 3 programs approved in EO-2018-0211. The MEEIA Cycle 1 programs ended on December 31, 2015, and have been fully recovered.

Ameren Missouri's first MEEIA programs were approved in EO-2012-0142. Further, Ameren Missouri's second three-year MEEIA cycle was approved in EO-2015-0055 and Ameren Missouri's third three-year MEEIA cycle was approved in Case No. EO-2018-0211. Lastly, Ameren Missouri's MEEIA Cycle 3 was currently extended for a fifth year through the end of 2023 in Case No. EO-2023-0178. Below is a summary of the program costs, throughput disincentive, earnings opportunity and kWh saved for all three MEEIA cycles to date.

¹ Ameren Missouri's filing proposes to decrease the MEEIA revenue requirement from \$101.8 million to \$95.5 million.

	MEEIA Cycle 1	MEEIA Cycle 2	MEEIA Cycle 3	MEEIA Cycle 3 Projected (extended through 2024)	Total
Program Cost	\$135,502,214	\$156,952,216	\$347,541,709	\$71,402,060	\$711,398,199
Through Disincentive Earnings	\$173,275,815	\$90,235,713	\$83,828,716	\$17,009,372	\$364,349,617
Earning Opportunity/Performance	\$28,246,579	\$42,889,494	\$27,448,749	\$9,982,211	\$108,567,032
Total Cost	\$337,024,609	\$290,077,424	\$458,819,174	\$98,393,643	\$1,184,314,849
Gross kWh Saved	1,152,915,000	955,297,948	1,348,564,638		
Evaluated kWh Saved		888,229,823			
Avg. cost per avoided kWh	\$0.29	\$0.33	\$0.34		

Ameren Missouri is projecting that the MEEIA Cycle 3 extension program costs, throughput disincentive, and earnings opportunity will be approximately \$98.4 million through 2024. Therefore, as shown in the table above, Ameren Missouri is projecting to have recovered from ratepayers through 2024 approximately \$1.2 billion for energy efficiency programs since MEEIA programs began in January 2013.

The Rider EEIC charge is reflected in a line item on the customer’s bill labeled “Energy Efficiency Invest. Chg.”. The proposed Rider EEIC rate changes are applicable to all kilowatt- hours (“kWh”) of energy supplied to customers served by Ameren Missouri under service classifications rate schedules 1(M) - Residential Service; 2(M) - Small General Service; 3(M) - Large General Service; 4(M) - Small Primary Service; 11(M) - Large Primary Service; and 12(M) - Large Transmission Service, excluding kWh of energy supplied to “opt-out” customers.

STAFF REVIEW

The table below provides the current Rider EEIC rate and the Company’s proposed rate.

Rate Class	Current	Proposed
	MEEIA	MEEIA
	Rate/kWh	Rate/kWh
1 (M) -Residential Service	\$0.003665	\$0.003572
2 (M) -Small General Service	\$0.003469	\$0.003739
3 (M) -Large General Service	\$0.004571	\$0.003824
4 (M) -Small Primary Service	\$0.004014	\$0.003425
11 (M) -Large Primary Service	\$0.003845	\$0.003506
12 (M) -Large Transmission Service	\$0.000000	\$0.000000

All else being equal, the average residential change pursuant to Rider EEIC will decrease by approximately 2.54% or \$0.09 per month per 1,000 kWh. A residential customer, using 1,000 kWh will have a total EEIC charge of approximately \$3.57 month or \$42.86 annually. Rider EEIC business rates per class vary due to projected costs, incentives, and customer opt outs per class of customer. The Small General Service rate will increase by approximately 7.78% or \$0.27 per month per 1,000 kWh; the Large General Service rate will decrease by approximately 16.34% or \$0.75 per month per 1,000 kWh; the Small Primary Service rate will decrease by approximately 14.67% or \$0.59 per month per 1,000 kWh; the Large Primary Service rate will decrease by approximately 8.82% or \$0.34 per month per 1,000 kWh. The monthly and annual average rate charge per 1,000 kWh are also given in the chart below for each rate class.

Rate Class	Rate Change	Cost of Change per x1,000 kWh	% of Change	Annually
1 (M) -Residential Service	(\$0.000093)	\$ (0.09)	-2.54%	\$42.86
2 (M) -Small General Service	\$0.000270	\$ 0.27	7.78%	\$44.87
3 (M) -Large General Service	(\$0.000747)	\$ (0.75)	-16.34%	\$45.89
4 (M) -Small Primary Service	(\$0.000589)	\$ (0.59)	-14.67%	\$41.10
11 (M) -Large Primary Service	(\$0.000339)	\$ (0.34)	-8.82%	\$42.07

STAFF RECOMMENDATION

The Commission Staff's ("Staff") has reviewed the filed tariff sheet. Staff recommends the Commission issue an order approving the following tariff sheet, as filed on December 1, 2023 for service on and after February 1, 2024, the requested effective date:

P.S.C. MO. No. 6

Fifth Revised Sheet No. 91.23 cancelling the Fourth Revised Sheet No. 91.23

Staff has verified that Ameren Missouri is not delinquent on any assessment and has filed its Annual Report. Staff is not aware of any other matter before the Commission that affects or is affected by this filing. Staff's recommendation for approval of the EEIC Rider rate changes in this case are solely based on the accuracy of Ameren Missouri's calculations and is not indicative of prudence.

BEFORE THE PUBLIC SERVICE COMMISSION

OF THE STATE OF MISSOURI

In the Matter of Union Electric Company)	
d/b/a Ameren Missouri's Electric Service)	Case No. ER-2024-0187
Tariffs Adjustment Relating to MEEIA)	Tariff No. JE-2024-0086
EEIC Rider)	

AFFIDAVIT OF MARINA STEVER

STATE OF MISSOURI)
) ss.
COUNTY OF COLE)

COMES NOW MARINA STEVER and on her oath declares that she is of sound mind and lawful age; that she contributed to the foregoing *Staff Recommendation, in Memorandum form*; and that the same is true and correct according to her best knowledge and belief.

Further the Affiant sayeth not.

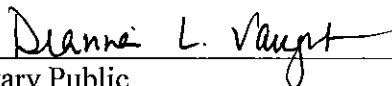


MARINA STEVER

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 27th day of December 2023.

DIANNA L. VAUGHT Notary Public - Notary Seal State of Missouri Commissioned for Cole County My Commission Expires: July 18, 2027 Commission Number: 15207377



Notary Public

BEFORE THE PUBLIC SERVICE COMMISSION
OF THE STATE OF MISSOURI

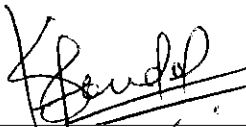
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d/b/a Ameren Missouri's Electric Service)	Case No. ER-2024-0187
Tariffs Adjustment Relating to MEEIA)	Tariff No. JE-2024-0086
EEIC Rider)	

AFFIDAVIT OF KRISHNA L. POUDEL, PhD

STATE OF MISSOURI)
)
COUNTY OF COLE) ss.

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

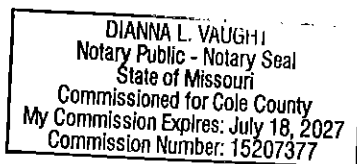
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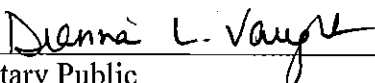


KRISHNA L. POUDEL, PhD

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 28th day of December 2023.





Notary Public