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MISSOURI PUBLIC SERVICE COMMISSION

CASE NO. EO-2023-0136

DIRECT TESTIMONY

OF

JEFF R. BRUEGGEMANN

ON

BEHALF OF

UNION ELECTRIC COMPANY

d/b/a Ameren Missouri

St. Louis, Missouri

January, 2024

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DIRECT TESTIMONY
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JEFF R. BRUEGGEMANN
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1 **I. INTRODUCTION**

2 **Q. Please state your name and business address.**

3 A. My name is Jeff R. Brueggemann. My business address is One Ameren
4 Plaza, 1901 Chouteau Avenue, St. Louis, Missouri 63103.

5 **Q. By whom are you employed and in what capacity?**

6 A. I am employed by Union Electric Company d/b/a Ameren Missouri
7 ("Ameren Missouri" or "Company") as a Senior Analyst in Energy Solutions.

8 **Q. What are your current responsibilities as a Senior Analyst?**

9 A. I am responsible for Evaluation Measurement and Verification ("EM&V")
10 tasks as well as data and analytical support for the Energy Efficiency and Demand
11 Response Programs for Ameren Missouri.

12 **Q. Please describe your educational background and relevant work**
13 **experience.**

14 A. I graduated from Ranken Technical College in 2001 with an Associates of
15 Applied Science degree in Industrial Maintenance Technology. I received a Bachelor
16 of Science degree in Business Administration in 2004.

17 My employment at Ameren began in 2001 as a Utility Tax Specialist assisting
18 customers in the process of completing energy audits and corresponding paperwork for
19 various tax exemptions on electric Energy Sales taxes. That role soon transitioned into

1 a role within a Products and Services group that conducted other maintenance and
2 energy type audit programs and offerings for customers. In 2009, I began working in
3 various capacities within Ameren's Energy Efficiency programs including working as
4 a Specialist in the Business programs and conducting much of the portfolio level
5 reporting for the Energy Efficiency programs. In 2017, I became an Analyst on the
6 Evaluation Measurement and Verification (EM&V) team for the programs. In 2020 I
7 was promoted to my current role as a Senior Analyst on the Energy Analytics team for
8 the MEEIA portfolio.

9 II. PURPOSE OF TESTIMONY

10 **Q. What is the purpose of your direct testimony in this proceeding?**

11 A. The purpose of my testimony is to discuss the data and detail related to the
12 Submittal Tool, DSMore and how the corresponding data feeds the
13 application. Additionally, I discuss changes the Company has made since the March 27,
14 2023 filing in an effort to better help stakeholders understand and follow the data.

15 **Q. Are you sponsoring any exhibits in support of your testimony?**

16 A. No.

17 **Q. Please explain your involvement with Ameren Missouri's Plan.**

18 A. I support many of the technical aspects of the Plan and am involved in
19 efforts such as the Evaluation Measurement and Verification work that impacts the plan,
20 the Technical Resource Manual used within the MEEIA plan, the DSMore analysis of cost
21 effectiveness, and the Submittal Tool which is used to build up the plan to summarize the
22 Cost, Savings and Cost effectiveness of the portfolio.

1 **Q. Please provide a high-level summary of the Submittal Tool, and how**
2 **the Company used it to develop the Plan.**

3 A. The Submittal Tool is an Excel based document that was originally created
4 to replicate the primary cost effectiveness tests derived from DSMore within an Excel
5 based document. DSMore is a proprietary tool from Integral Analytics that Ameren
6 Missouri uses to calculate cost effectiveness of the programs since the inception of the
7 MEEIA programs in Missouri. The Submittal Tool was originally used to adjust
8 program or measure attributes (e.g., quantities, cost, savings, etc.) and this allowed the
9 user to immediately see the impact of those changes on cost-effectiveness at a program
10 or portfolio level. In effect, the purpose of the Submittal Tool was to speed up the
11 process and make it more transparent to Ameren staff, contractors, and regulators.
12 Over time the Submittal Tool grew in scope to display granular details of how the
13 programs are constructed from a measure level all the way up to the portfolio level
14 while linking the costs, savings, and benefits into a single document by means of
15 formulas. The Submittal Tool requires a few preliminary inputs to operate on the most
16 up to date or appropriate assumptions such as:

- 17 • Inputs from Implementation contractors and Ameren Missouri staff
18 to identify specific EE programs, the measure types and quantities
19 assumed within each program and the administrative and incentive
20 level cost associated with each program, measure, or portfolio that
21 in most cases are initiated by means of an RFP (Request for
22 Proposal) process and fine-tuned by Subject Matter experts.

- 1 • An initial DSMore analysis that conducts a benefit analysis for 1
2 kWh of savings for every possible end-use, measure life
3 combination using the appropriate IRP avoided cost, discount rates
4 and other assumptions that are input into the corresponding DSMore
5 template. This provides the necessary inputs to calculate a TRC
6 (Total Resource Cost) test and a UCT (Utility Cost Test).
- 7 • An input summary of the measure level savings and other attributes
8 from the Ameren Missouri TRM (Technical Resource Manual) to
9 act as a look up table to link the appropriate prescriptive measure
10 attributes to the appropriate efficiency measures by means of the
11 Measure ID numbers to improve accuracy, prevent manual entry
12 errors, and allow for more efficient measure updates when a new
13 TRM version becomes available.

14 Lastly, a version of the Submittal Tool is also provided to bidders for them to fill
15 out during an RFP process. This allows bidders to provide Ameren Missouri with more
16 consistent proposals by using the structure and measure attributes that have been approved
17 and evaluated through our programs to date by inputting their assumed quantities,
18 incentive/administrative rates, etc. specific to their proposal. This added consistency
19 simplifies the RFP process and also gives bidders a tool that provides cost effectiveness
20 results as they build a model for each program or portfolio.

1 **Q. Can DSMore be used to evaluate the cost effectiveness of potential**
2 **programs?.**

3 A. Yes, as noted above, DSMore is a proprietary tool from Integral Analytics
4 that Ameren Missouri uses to calculate cost effectiveness of its energy efficiency programs
5 since the inception of the MEEIA programs in Missouri. Ameren Missouri also uses
6 DSMore to evaluate cost effectiveness of potential programs or measures and the annual
7 DSM report required in the MEEIA rules. Ameren Missouri's evaluation contractors also
8 use DSMore to evaluate the cost effectiveness of draft and final EM&V reports for each
9 program year. DSMore provides the results of cost effectiveness tests for our MEEIA
10 portfolio such as the TRC (Total Resource Cost), UCT (Utility Cost Test), PCT (Participant
11 Cost Test), and RIM (Ratepayer Impact Test).

12 **Q. Can you describe the flow of data, ultimately to where and how it is a**
13 **part of the Plan?**

14 A. The data for a new MEEIA plan generally initiates from the most recent
15 Ameren Missouri Potential study and subsequent Integrated Resource Plan to set goals and
16 targets that are provided to the program implementation contractors by means of a Request
17 for Proposal (RFP). Bidders provide responses to Ameren Missouri along with a completed
18 Submittal Tool(s) which summarizes the measures and savings that they anticipate are
19 achievable in our market. Ameren Missouri Program staff reviews the bids and may select
20 programs and measure attributes from these bids that seem most relevant based on their
21 experiences with past programs and knowledge of the industry. Ameren Missouri then
22 begins building a subsequent Submittal Tool for a MEEIA filing which incorporates those
23 measure level attributes and in most cases mirrors predominantly what came out of the

1 winning bidders from that RFP process. Ameren Missouri Program Implementation staff
2 review and adjust those assumptions based on their expertise on a specific program or
3 measure. Additionally, Ameren Missouri staff may go through multiple iterations of
4 changes to measure quantities or attributes of programs before settling on what in the end
5 is filed in the Plan. This iterative process is based on the bids received, the historical
6 knowledge they have, and discussions with various implementors to closely align with the
7 goals set forth in the IRP. If a TRM update is approved subsequent to the time the RFP
8 was issued, the measure index tab within the Submittal Tool can be updated to reflect the
9 newly approved measure attributes for those measures from Evaluation efforts. Once all
10 the assumptions in the Submittal Tool are assembled, the Submittal Tool is reviewed for
11 completeness and consistency throughout. Next, we generally re-validate the Submittal
12 Tool model by building the same programs and attributes up in separate DSMORE models
13 (this process was described in the October 18, 2023, workshop)¹ and run the analysis in
14 that model validating the cost effectiveness results. Additionally, the Submittal Tool
15 currently does not provide results for the PCT (Participant Cost Test), and RIM Ratepayer
16 Impact Test, therefore this DSMore model is currently needed to provide those cost test
17 results.

18 **Q. Are you the same Jeff Brueggemann that was the lead presenter at the**
19 **October 18, 2023, stakeholder workshop on the Company's MEEIA 4 filing data?**

20 **A. Yes.**

¹ This is the same October 18, 2023 workshop discussed in the Direct Testimony of Antonio M. Lozano as part of this Amended Application. The workpapers include the presentation from this workshop.

1 **Q. Please discuss what work conducted between the March 27, 2023, filing**
2 **and this updated filing to afford stakeholders an opportunity to understand and**
3 **follow the data better.**

4 A. Ameren Missouri met with stakeholders on October 18, 2023, in order to
5 help provide clarity and answer questions about the Submittal Tool and DSMore. During
6 that meeting, a presentation was given to help identify the roles of those tools, how they
7 operate and sources of the data that feed into them and the results they generate.

8 Since that workshop Ameren Missouri has responded to several formal data
9 requests regarding specific questions involving DSMore, load-shapes, Submittal Tool, and
10 the IRP to help clarify remaining items.

11 To continue to improve the work initiated with the original intent of the Submittal
12 Tool and the effort to create transparency throughout this process, we have made efforts to
13 better label source data within the Submittal Tool and more clearly tie inputs back to the
14 original source throughout the Submittal Tool and also throughout this filing.

15 Examples include:

- 16 • The addition of a "Sources" tab within the Submittal Tool that lists each tab
17 name and the primary source of the data within that tab where applicable.
 - 18 ○ To the extent possible we are also including specific
19 workpaper and cell references to more directly identify data
20 sources where applicable.
- 21 • A directory of many of the charts and graphs that are used within the filing
22 has been updated and used to document much of this data in a single file
23 with sources cited throughout.

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

In the Matter of Union Electric Company)
d/b/a Ameren Missouri's 4th Filing to)
Implement Regulatory Changes in Furtherance) File No. EO-2023-0136
of Energy Efficiency as Allowed by MEEIA.)

AFFIDAVIT OF JEFF R. BRUEGGEMANN

STATE OF MISSOURI)
)
CITY OF ST. LOUIS)

Jeff R. Brueggemann, being first duly sworn on his oath, states:

My name is Jeff R. Brueggemann on his oath declare that he is of sound mind and lawful age; that he has prepared the foregoing *Direct Testimony*; and further, under the penalty of perjury, that the same is true and correct to the best of my knowledge and belief.

/s/ Jeff R. Brueggemann
Jeff R. Brueggemann

Sworn to me this 24th day of January, 2024.