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Witness:	Jeffrey R. Huber
Sponsoring Party:	Union Electric Company
Type of Exhibit:	Direct Testimony
Case No.:	EO-2023-0136
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MISSOURI PUBLIC SERVICE COMMISSION

CASE NO. EO-2023-0136

DIRECT TESTIMONY

OF

JEFFREY R. HUBER

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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JEFFREY R. HUBER

CASE NO. EO-2023-0136

I. INTRODUCTION

Q. Please state your name and business address.

A. My name is Jeffrey R. Huber. My business address is 1850 Parkway Place, Suite 800, Marietta, Georgia 30067. I am submitting this testimony on behalf of Ameren Missouri.

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

A. I am employed as a Principal by GDS Associates, Inc. ("GDS"). GDS is a multi-service consulting and engineering firm. Formed in 1986, GDS employs a staff of more than 180 in nine locations across the U.S. GDS offers information technology, market research, and statistical services to a broad client base of Electric, Gas, Water, and Wastewater Utilities.

Q. What are your current responsibilities as a Principal?

A. I currently oversee the Energy Efficiency and Renewable group in Marietta, Georgia. This group specializes in DSM program planning activities, including conducting market potential assessments, and providing DSM inputs for Integrated Resource Plan models. My group has conducted more than 15 market potential studies over the last 5 years.

Q. Please describe your educational background and relevant work experience.

A. I received a Bachelor's degree in Anthropology and Criminology from the University of Florida in May 2001. In May 2004, I was awarded a Master of Arts degree in Anthropology, with a graduate minor in Statistics, from the University of Tennessee. Since joining GDS Associates in 2005, I have been involved primarily in planning and/or evaluating projects for energy efficiency and demand response programs for utility clients and/or state organizations. I have conducted energy efficiency potential market assessments in over a dozen states and across more than two dozen utility service areas focused primarily across the Midwest, South, and Northeast. I have formally presented results from these market potential assessments in front of Commissions and Commission staff in Indiana, Maine, Michigan, Missouri, Pennsylvania, and Vermont. In addition to market potential assessments, I have conducted market baseline studies for residential market rate, residential low-income, and nonresidential customers in several states, performed cost-effectiveness screening of utility programs, and engaged in regulatory oversight of energy efficiency programs for other organizations.

II. PURPOSE OF TESTIMONY

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

A. My purpose is to review the scope of services included in the most recent DSM Market Potential Study ("2023 DSM MPS") for Ameren Missouri, and the timing of the deliverables as that relates to the March 27, 2023, filing.

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

A. No.

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

A. Although an MPS is not intended to be a detailed portfolio and/or program plan document, GDS was tasked with verifying that the latest MEEIA Plan filing was generally consistent with the findings of the 2023 Market Potential Study in terms of overall savings impacts and costs. GDS also supported Ameren Missouri with developing a directory of all charts and tables (and corresponding source information) included in the Company's Plan.

The 2023 DSM MPS

Q. Please describe the deliverables you and your team provided to the Company, as part of your work on the 2023 DSM MPS.

A. The GDS Team conducted a market potential study for Ameren Missouri, which included a variety of tasks, sub-tasks, and deliverables. At the outset of the study, GDS conducted a historical performance variance analysis, which helped inform subsequent analyses by connecting historical results to estimates of future savings opportunities. This involved comparing the estimates of Ameren Missouri's 2020 potential study with actual costs and savings across 2019-2021 as identified in Evaluation, Measurement and Verification (EM&V) reports across that timeframe.

- GDS then developed estimates of technical and economic potential for energy efficiency, demand response, and distributed energy resources measures. This required creating a sector-level load forecast disaggregation, creating a measure list and developing a measure assumptions database for each sector (and each element of the study – energy efficiency, demand response, and distributed energy resources) and creating models to calculate estimates of technical and economic potential.

- Then the study developed maximum and realistic achievable potential by applying market adoption rates to the previously identified technical and economic potential. This step involved developing measure-level estimates of long-term market adoption or acceptance rates, which factored in customer willingness and likelihood to adopt measures considering variable incentive levels and barriers to adoption such as lack of information, time, awareness, access to capital, and other possible constraints.
- The estimates of achievable potential were then used to conduct a range of sensitivity analyses and a related load flexibility analysis. Sensitivities assessed the impact on the results of alternative avoided costs (higher and lower), a hypothetical prolonged economic downturn, short-term impacts associated with the COVID-19 pandemic, a range of potential attribution outcomes (NTG ratios), the potential impacts of higher impact program marketing, the inclusion of large customer opt-outs, changing weather patterns, technology improvements, program design changes such as increased funding to the income-qualified segment of the population and alternative delivery methods, among other scenarios.
- The results of the technical, economic, and achievable potential analyses, sensitivity analysis and load flexibility analysis were then provided in a written report to Ameren Missouri. GDS also created sector-level IRP inputs for each element of the study (energy efficiency, demand response, and distributed energy resources) to support Ameren with its IRP planning. Finally, GDS provided documentation of how the study addressed each of the compliance checklist items pertinent to all applicable IRP rules, MEEIA rules and other stipulated commitments.

Q. Did the timing, order and nature of those deliverables adjust as the effort got underway? If so, why?

A. At the outset of the project, GDS provided an estimated project schedule with each of the associated tasks of the project. The timing and order of project delivery generally held true to the original plan. There were some adjustments to the nature of the

deliverables as the project proceeded. For example, the determination of the sensitivities to conduct, as well as the precise nature of the data inputs needs for the load flexibility analysis and IRP inputs required an iterative process. This meant that GDS provided the results in multiple draft forms before the results were finalized. GDS worked with Ameren Missouri and other stakeholders to ensure that the results produced by the study met future planning needs and met all applicable compliance checklist items.

Q. Was your company able to produce the desired deliverables, when needed?

A. To the best of my knowledge, GDS provided the desired deliverables in a timely manner as needed by Ameren Missouri.

Q. Do you recall if the information your company produced was presented and discussed with stakeholders? Please provide relevant information.

A. The GDS Team included as part of the scope of work a process by which stakeholders would be able to review study inputs and methodologies and draft results and have multiple opportunities to provide feedback and have the study address any concerns. This included four workshops across the study timeframe to provide an overview of the study, discuss options and general methodologies, suggest new sensitivity analysis in the 2023 MPS, review and comment on the load flexibility approach, and review the study results (see summary table below). To the best of our knowledge, GDS incorporated stakeholder feedback, suggestions, and concerns, to ensure that the study was done in a collaborative manner that served the mutual interests of all interested parties.

List of Stakeholder Workshops

Stakeholder Workshop Dates	Topics
Workshop #1 – April 2022	Project Overview
Workshop #2 – July 2022	Methodologies and Sensitivity Analysis Topics
Workshop #3 – September 2022	Load Flexibility Analysis
Workshop #4 – December 2022	Updated Results and Sensitivities
Workshop #5 – May 2023	MPS Study Results

III. CONCLUSION

Q. Does this conclude your direct testimony?

A. Yes, it does.

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 of Energy Efficiency as Allowed by MEEIA.	))))	File No. EO-2023-0136

AFFIDAVIT OF JEFFREY R. HUBER

STATE OF MISSOURI)
)
CITY OF ST. LOUIS)

Jeffrey R. Huber, being first duly sworn on his oath, states:

My name is Jeffrey R. Huber 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.

Jeffrey R. Huber

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