

benefits” from these units without the requested extension.³

As noted in Staff’s *Initial Brief, a Unanimous Stipulation and Agreement* (“Stipulation”) was filed in this docket on February 24, 2021, and approved by the Commission on April 9, 2021.⁴ Page 4, paragraph 11 of the Stipulation outlined the reporting requirements for the Pilot Program, which required Ameren Missouri to file reports at the program term midpoint, and a final report at the end of the Initial Period, with operable workpapers (as applicable).⁵ The reporting requirements included:

- Program information, by type of equipment (TRU, High Capacity Lift Trucks):
 - Physical address, account number, and account billing schedule, as well as (as applicable) locations of the participating customers' affiliated entities also participating in the incentive program;
 - Incentive paid; and
 - Equipment power levels;
- Direct load/revenues by location for separately metered program measures;
- Estimated direct load/revenues by location for program measures that are not separately metered, with workpapers;
- Total administrative cost breakdown including a detailed description of advertising and education activities to date; and
- 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

³ *Id.*, pg. 4; see also Ex. 2, pg. 4.

⁴ *Initial Brief of Staff*, pg. 2-3; see also Ex. 1, pg. 2; see also *Unanimous Stipulation and Agreement*, EFIS item 23 in this docket.

⁵ *Id.*

equipment impact on customer loads during peak and off-peak periods.⁶

The final report has yet to be filed. At this time, an extension of the Program is inconsistent with Ameren Missouri's pending Missouri Energy Efficiency Investment Act ("MEEIA") application,⁷ and extending the Pilot Program before Staff has begun, let alone completed, a thorough analysis of the efficacy of the Pilot Program is not in the public interest.

The continuation of the Pilot Program is inconsistent with Ameren Missouri's pending MEEIA application, and the energy and capacity needs asserted by Ameren Missouri across dockets.⁸ In addition, a final report has not yet been finalized and filed in EFIS. Since the Commission ordered a Pilot Program with requirements to provide analysis of the efficacy of the program upon its end, it would be against the public interest to extend the Pilot Program before any such analysis takes place.⁹ Thus, with the Initial Period having ended on May 30, 2024, Staff does not recommend an extension of the Pilot Program at this time.

WHEREFORE, Staff recommends that the Commission reject the following proposed tariff sheets Ameren Missouri filed on March 28, 2024:

P.S.C. MO. No. 6

1st Revised Sheet No. 164.4 Canceling Original Sheet No. 164.4

2nd Revised Sheet No. 164.5 Canceling 1st Revised Sheet No. 164.5

⁶ Exhibit 1, pg. 3; see also *Unanimous Stipulation and Agreement*, EFIS item 23 in this docket

⁷ Exhibit 1, pg. 4; see also Case No. EO-2023-0136,

⁸ *Id.*

⁹ *Id.*

Respectfully submitted,

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CERTIFICATE OF SERVICE

I certify that copies of the foregoing have been electronically mailed to all parties and/or counsel of record on this 9th day of July 2024.

/s/ Travis J. Pringle