BEFORE THE PUBLIC SERVICE COMMISSION OF THE STATE OF MISSOURI

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In the Matter of the Application of Union Electric Company d/b/a Ameren Missouri for Approval of Efficient Electrification Program

File No. ET-2021-0020 Tracking No. JE-2024-0131

REPLY BRIEF OF AMEREN MISSOURI

COMES NOW Union Electric Company d/b/a Ameren Missouri ("Ameren Missouri"), and for its Reply Brief respectfully states to the Missouri Public Service Commission ("Commission") as follows:

Ameren Missouri's request is a simple request. The proposed tariff sheets, assigned Tracking No. JE-2024-0131, extend the Charge-Ahead – Business Solutions program (the "Program") for a period of two years, through May 31, 2026.¹ Due to the challenge of finding program partners in the Midwest, the Program has been slow to start.² Ameren Missouri is not requesting a change to the budget of the Program. The Program budget shall not exceed the \$1.9 million approved in the Stipulation, with at least \$1.52 million available for incentives under the Program, and the remainder of the Program funding being available for administrative and educations activities. ³ No other changes to the Program are requested by Ameren Missouri.⁴

The Program is a pilot with a small and limited scope to learn more about the market for these technologies and the benefits of them perceived by customers.⁵ At the same time, the pilot should provide additional information about how these technologies are used in the context of Ameren Missouri's system.⁶ This should help inform expectations regarding the extent to which

⁵ Ex. 2, p. 3. ⁶ *Id*.

¹ See Tracking No. JE-2024-0131, filed March 28, 2024. See also Ex. 2, p. 1.

² Ex. 2, p. 3.

³ Id.

⁴ Ex. 2, p. 1.

these types of loads will impact future peak loads and capacity investments while the Program is at a scale that is not expected to significantly impact the system.⁷

In Staff's Memorandum, Staff states that "[e]xtension of this load building program is contrary to Ameren Missouri's pending MEEIA Application in EO-2023-0136, and is inconsistent with energy and capacity needs Ameren Missouri has asserted across dockets." Staff alleges the goal of the Program is to increase sales of energy. Staff misconstrues Ameren Missouri's testimony in order to support Staff's incorrect assumption. It is true that customers that invest in electrification of HCLTs and e-TRU unit ports will see an increase in usage on their electric bill, all else remaining equal.⁸ However, load building is not the "goal" of this Program as Staff asserts.⁹ The "goal" or purpose of the Program is explicitly set out in the tariff sheets that Staff recommended approval of on May 5, 2021, in this case:

PURPOSE

The Charge-Ahead – Business Solutions program (the Program) encourages business customers to adopt efficient electrification measures that provide economic, health, and performance benefits to them, environmental benefits to all, and increased overall customer affordability through positive benefit/cost ratios.¹⁰

Further, even if Ameren Missouri paid out all of the incentive dollars available over the next 2 years split evenly between HCLT and e-TRUs, it would increase Ameren Missouri's MWh load only by 16,103 MWhs.¹¹ This would be the equivalent of adding 1,314 homes to Ameren Missouri's system or an overall increase of only .052% of total load.¹²

- ⁸ Ex. 2, p. 5.
- ⁹ Id. ¹⁰ Id.
- 11 Id.
- 12 Id.

⁷ Ex. 2, p. 3.

WHEREFORE, Ameren Missouri requests the Commission approve the extension of the Charge-Ahead – Business Solutions Program through May 31, 2026, and direct Ameren Missouri to file compliance tariff sheets for approval on an expedited basis.

Respectfully submitted,

<u>/s/ Jennifer L. Hernandez</u>

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ATTORNEY FOR UNION ELECTRIC COMPANY d/b/a AMEREN MISSOURI

CERTIFICATE OF SERVICE

I hereby certify that copies of the foregoing have been emailed to the parties of record on this 9th day of July 2024.

/s/ Jennifer L. Hernandez