

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

⁷ Ex. 2, p. 3.

⁸ Ex. 2, p. 5.

⁹ *Id.*

¹⁰ *Id.*

¹¹ *Id.*

¹² *Id.*

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,

/s/ Jennifer L. Hernandez

Jennifer L. Hernandez, MO Bar #59814

Corporate Counsel

1901 Chouteau Avenue, MC 1310

P.O. Box 66149

St. Louis, MO 63166-6149

(314) 978-8418 (Telephone)

(314) 554-4014 (Facsimile)

AmerenMOService@ameren.com

**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