

FILED  
AUG 15 2024  
Missouri Public  
Service Commission

# Exhibit No. 220

Staff – Exhibit 220  
Marina Stever Testimony  
Direct  
File No. EO-2023-0136

*Exhibit No.:*  
*Issue:* *MEEIA Costs-to-date*  
*Witness:* *Marina Stever*  
*Sponsoring Party:* *MoPSC Staff*  
*Type of Exhibit:* *Direct Testimony*  
*Case No.:* *EO-2023-0136*  
*Date Testimony Prepared:* *March 1, 2024*

**MISSOURI PUBLIC SERVICE COMMISSION**

**INDUSTRY ANALYSIS DIVISION**

**TARIFF/RATE DESIGN DEPARTMENT**

**DIRECT TESTIMONY**

**OF**

**MARINA STEVER**

**UNION ELECTRIC COMPAY  
d/b/a AMEREN MISSOURI**

**CASE NO. EO-2023-0136**

*Jefferson City, Missouri  
March, 2024*



1 EO-2018-0211. Ameren Missouri’s MEEIA Cycle 3 has entered its sixth year and most recently  
2 received approval to adjust its EEIC Rider through the end of 2024 in Case No. ER-2024-0187.

3 Q. Please describe the cost breakdown.

4 A. According to the projections extending through 2024 that were presented in  
5 Case No. ER-2024-0187, Ameren Missouri was forecasted to have recovered approximately  
6 \$1.2 billion from ratepayers for energy efficiency programs since the inception of MEEIA.<sup>1</sup>  
7 For the purpose of this testimony, costs associated with each cycle can be broken down into  
8 three categories: program costs, throughput disincentive earnings, and earning opportunities.  
9 Programs costs stem from the approved program budgets and reflect the total amount spent  
10 during the effective period. Throughput Disincentive Earnings represent funds recovered by the  
11 Company for avoided energy sales as a result of energy efficiency programs sponsored by  
12 MEEIA. Ameren Missouri has fully recovered the \$337,024,069 in costs associated with  
13 MEEIA Cycle 1. The Company recovered a total of \$290,077,424 from MEEIA  
14 Cycle 2 programs. Including the \$98,393,643 forecasted for 2024, Ameren Missouri is  
15 projected to recover a total of \$557,212,817 for MEEIA Cycle 3 programs. The cost category  
16 breakdown per cycle can be found in *Table 1* below.

	MEEIA Cycle 1	MEEIA Cycle 2	MEEIA Cycle 3	MEEIA Cycle 3 Projected (extended through 2024)	Total
Program Cost	\$135,502,214	\$156,952,216	\$347,541,709	\$71,402,060	\$711,398,199
Through Disincentive Earnings	\$173,275,815	\$90,235,713	\$83,828,716	\$17,009,372	\$364,349,617
Earning Opportunity/Performance	\$28,246,579	\$42,889,494	\$27,448,749	\$9,982,211	\$108,567,032
<b>Total Cost</b>	<b>\$337,024,609</b>	<b>\$290,077,424</b>	<b>\$458,819,174</b>	<b>\$98,393,643</b>	<b>\$1,184,314,849</b>

17 *Table 1. Ameren Missouri Costs for MEEIA Cycles 1, 2 & 3*

18 Q. Are there any other costs to consider?

<sup>1</sup> Case No. ER-2024-1087 Item No. 1 *Schedule JNG-D2- MEEIA Rider Calcs November 2023-rates.xlsx*.

1           A.     My testimony only accounts for what directly flows through Ameren Missouri's  
2 Energy Efficiency Investment Charge (EEIC); however, adjustments to rate revenue and billing  
3 determinants to account for MEEIA programs have also been included in Ameren Missouri's  
4 general rate cases that increase rates, all else being equal. Additionally, it is important to  
5 consider the impact that avoided energy sales as a result of MEEIA programs have on the  
6 Fuel Adjustment Charge (FAC). As explained in greater detail by Staff Expert J Luebbert, if  
7 the avoided energy sales take place at average or below-average costs, then we would expect to  
8 see an increase in the FAC rates, effectively offsetting the benefits received by customers.

9           Q.     What, if any, improvements could be made to the process of filing tariff  
10 adjustments for the EEIC Rider?

11          A.     Currently, the Company is required to file tariff adjustments for the EEIC Rider  
12 by December 1<sup>st</sup> of each year, while Staff is required to submit a recommendation for the  
13 Commission within no more than 30 days. This routinely competes with multiple reoccurring  
14 cases, as well as multiple holidays. Staff recommends moving the filing date to November 1<sup>st</sup>  
15 to allow for a proper evaluation of the Company's submission.

16          Q.     Are you making any recommendations in this testimony?

17          A.     I support Staff's overall position in this case. However, my testimony is to  
18 provide the Commission with the costs incurred to-date, as well as those projected by the  
19 Company through the end of 2024, associated with Ameren Missouri's MEEIA program.

20          Q.     Does this conclude your testimony?

21          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 4<sup>th</sup> Filing to Implement )  
Regulatory Changes in Furtherance of Energy ) Case No. EO-2023-0136  
Efficiency as Allowed by MEEIA )  
 )

**AFFIDAVIT OF MARINA STEVER**

STATE OF MISSOURI )  
 ) ss.  
COUNTY OF COLE )

**COMES NOW MARINA STEVER** and on her oath declares that she is of sound mind and lawful age; that she contributed to the foregoing *Direct Testimony of Marina Stever*; and that the same is true and correct according to her best knowledge and belief.

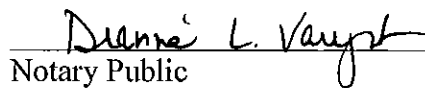
Further the Affiant sayeth not.

  
\_\_\_\_\_  
**MARINA STEVER**

**JURAT**

Subscribed and sworn before me, a duly constituted and authorized Notary Public, in and for the County of Cole, State of Missouri, at my office in Jefferson City, on this 27<sup>th</sup> day of February 2024.

DIANNA L. VAUGHT  
Notary Public - Notary Seal  
State of Missouri  
Commissioned for Cole County  
My Commission Expires: July 18, 2027  
Commission Number: 15207377

  
\_\_\_\_\_  
Notary Public

## **Credentials and Background of Marina Stever**

I have a Master’s of Science in Environmental and Natural Resource Economics from the University of Rhode Island. Additionally, I hold a Bachelor’s of Science in Business Administration with a concentration in Economics from the University of Central Missouri. My work experience prior to becoming of member of the Missouri Public Service Commission Staff includes two years as an Energy Analyst at Missouri’s Department of Natural Resources- Division of Energy, as well as one year as an Economic Development Specialist at Missouri’s Department of Economic Development.

I am currently employed as a Data Analyst in the Tariff/Rate Design Department of the Industry Analysis Division of the Missouri Public Service Commission Staff. I have been employed at the Missouri Public Service Commission since October 2023 and am responsible for preparing independent Staff recommendations to inform the Commission.

<b>Case Number</b>	<b>Company</b>	<b>Issues</b>
ER-2024-0112	Ameren Missouri	RESRAM Rate Adjustment
ER-2024-0187	Ameren Missouri	MEEIA EEIC Rider Adjustment

	MEEIA Cycle 1	MEEIA Cycle 2	MEEIA Cycle 3	MEEIA Cycle 3 Projected (extended through 2024)	Total
Program Cost	\$135,502,214	\$156,952,216	\$347,541,709	\$71,402,060	\$711,398,199
Through Disincentive Earnings	\$173,275,815	\$90,235,713	\$83,828,716	\$17,009,372	\$364,349,617
Earning Opportunity/Performance	\$28,246,579	\$42,889,494	\$27,448,749	\$9,982,211	\$108,567,032
<b>Total Cost</b>	\$337,024,609	\$290,077,424	\$458,819,174	\$98,393,643	<b>\$1,184,314,849</b>
Gross kWh Avoided	1,152,915,000	955,297,948	1,348,564,638		
Evaluated kWh Avoided		888,229,823			
Avg. cost per avoided kWh	\$0.29	\$0.33	<b>\$0.34</b>		

ER-2023-0178

	MEEIA Cycle 1	MEEIA Cycle 2	MEEIA Cycle 3	MEEIA Cycle 3 Projected (extended through 2023)	Total
Program Cost	\$135,502,214	\$156,952,216	\$271,927,995	\$74,004,575	\$638,387,000
Through Disincentive Earnings	\$173,275,815	\$90,235,713	\$68,578,565	\$19,944,548	\$352,034,641
Earning Opportunity/Performance	\$28,246,579	\$42,889,494	\$15,701,260	\$11,747,489	\$98,584,822
<b>Total Cost</b>	\$337,024,608	\$290,077,424	\$356,207,819	\$105,696,612	<b>\$1,089,006,463</b>
Gross kWh Avoided	1,152,915,000	955,297,948	1,348,564,638		
Evaluated kWh Avoided		888,229,823			
Avg. cost per avoided kWh	\$0.29	\$0.33	<b>\$0.26</b>		

ER-2022-0146

	MEEIA Cycle 1	MEEIA Cycle 2	MEEIA Cycle 3	MEEIA Cycle 3 (extended through January 2023)	Total
Program Cost	\$135,502,214	\$157,048,581	\$208,290,048	\$69,422,259	\$570,263,101
Through Disincentive Earnings	\$173,275,815	\$90,214,489	\$46,207,036	\$15,155,864	\$324,853,204
Earning Opportunity/Performance	\$28,246,579	\$42,889,494	\$15,721,089		\$86,857,162
<b>Total Cost</b>	\$337,024,608	\$290,152,564	\$270,218,173		\$897,395,346
Gross kWh Avoided	1,152,915,000	955,297,948	990,806,707		
Evaluated kWh Avoided		888,229,823			
Avg. cost per avoided kWh	\$0.29	\$0.33	\$0.27		



			<b>MEEIA Cycle 3 (through January 2021)</b>	
	<b>MEEIA Cycle 1</b>	<b>MEEIA Cycle 2</b>		<b>Total</b>
<b>Program Cost</b>	\$135,502,214	\$157,583,246	\$125,340,011	\$418,425,472
<b>Throughput Disincentive</b>	\$173,275,815	\$89,750,305	\$17,073,859	\$280,099,979
<b>Earnings</b>				
<b>Opportunity/Performance Incentive</b>	\$28,246,579	\$42,889,494	\$6,239,381	\$77,375,454
<b>Total Cost</b>	\$337,024,608	\$290,223,045	\$148,653,251	\$775,900,904
Gross kWh Avoided	1,152,915,000	955,297,948	624,273,218	
Evaluated kWh Avoided		888,229,823		
Avg. cost per avoided kWh	\$0.29	\$0.33	\$0.24	