

FILED
AUG 15 2024
Missouri Public
Service Commission

Exhibit No. 300

OPC – Exhibit 300
OPC's Opening Presentation
File No. EO-2023-0136

OPC Opening

Case No. EO-2023-0136

Overview

- Collaborative history of MEEIA
- Amended Application inefficiencies
- Options

Collaborative History

Collaborative History of MEEIA

- *2009*: MEEIA Statute
- *January 2012*: Ameren MEEIA 1 Application
- *August 2012*: Commission approval of Unanimous Stipulation

Collaborative History of MEEIA

- *December 2014*: Ameren MEEIA 2 Application
- *October 2015*: Commission rejection of Utility Stipulation
- *February 2016*: Commission approval of MEEIA 2 Non-Unanimous Stipulation

Collaborative History of MEEIA

- *June 2018*: Ameren MEEIA 3 Application
- *December 2018*: Commission approval of Stipulation

Collaborative History of MEEIA

- *August 2020*: Commission approval of Unanimous Stipulation to extend MEEIA 3 through 2022
- *October 2021*: Commission approval of Unanimous Stipulation to extend MEEIA 3 through 2023
- *August 2023*: Commission approval of Unanimous Stipulation to extend MEEIA 3 through 2024

Inefficiencies

7 Sets of Problems

- Benefits
- EM&V Process
- IRA/Market Dynamics
- Throughput Disincentive
- Administrative Overhead
- Programs
- Earnings Opportunity

Problem: Benefits

Recovery not allowed unless “beneficial to all customers in the customer class in which the programs are proposed, regardless of whether the programs are utilized by all customers”

-§ 393.1075.4 RSMo.

Problem: Benefits

- Cost/Benefit Analyses are a guess
 - Important considerations excluded
- Failure to consider FAC distribution
- Failure to avoid or defer supply side
- Risk/Reward imbalance

Problem: IRA/Market Dynamics

- Alternatives exist
- Free riders
- Customers facing:
 - Requirement that Ameren build
 - High inflation
- Changed market=Inefficient options no longer exist

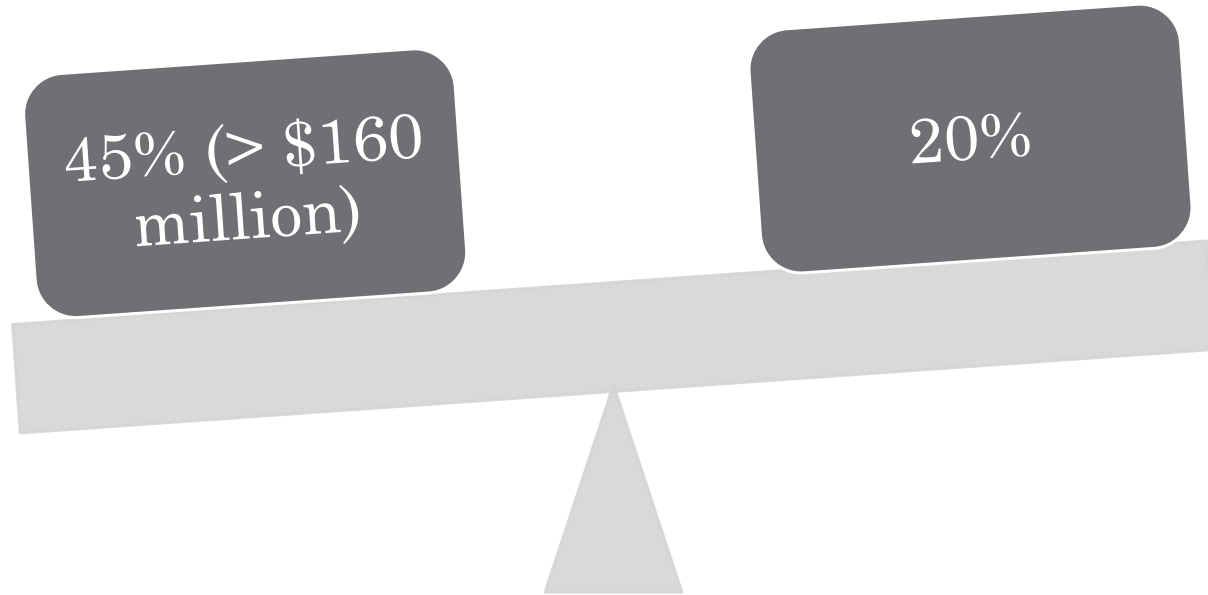
Problem: Administrative Costs

MEEIA 4

IRA

45% (> \$160 million)

20%



Problem: Earnings Opportunity

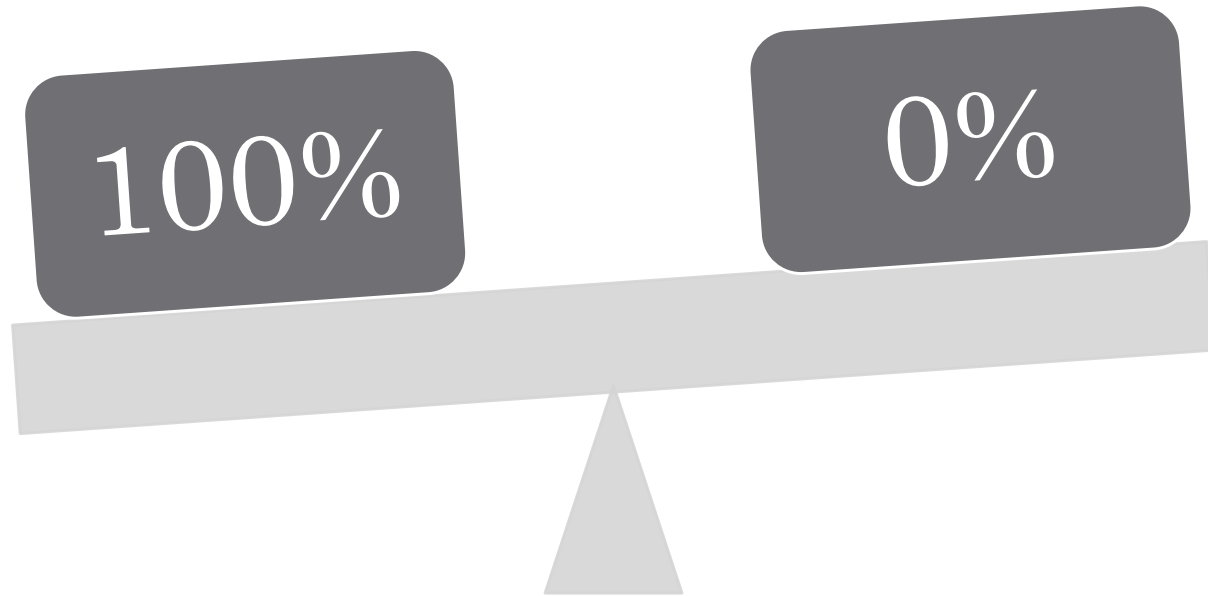
Ratepayers

Shareholders

Risk?

100%

0%



Problem: EM&V

- Trying to prove a counterfactual
- Prospective EM&V moves risk to ratepayers

Problem: Throughput Disincentive

- *See Ms. Lange's Testimonies*
- Changed circumstances with TOU and AMI

Problem: Programs

- Redundancy: BDR with ARC's
- Significant Free Riders: Whole Home New Construction
- Significant Overlap: MEEIA 4 with IRA

Path Forward

Where to Next?

- *Option 1:* Ignore problems and approve
- *Option 2:* Reject Application and embrace alternatives
- *Option 3:* Dr. Marke Alternative Plan

OPC Witnesses

OPC Witness: Jordan Seaver

- Masters in Philosophy
- Discusses flawed reasoning

OPC Witness: Lena Mantle

- Professional Engineer (PE)
- Expert on FAC
- Experience with Energy Efficiency
- Discusses distribution of MEEIA benefits

OPC Witness: Geoff Marke

- Witness on every issue
- Involved since Cycle 1
- Nationally recognized
- Speaker at numerous venues at all levels

Relief

- Reject Amended Application

-OR-

- Approve with modifications listed in Dr. Marke's Surrebuttal Testimony

Questions?