BEFORE THE PUBLIC SERVICE COMMISSION
OF THE STATE OF MISSOURI

In the Matter of Union Electric Company d/b/a Ameren Missouri's 4th Filing to Implement Regulatory Changes in Furtherance of Energy Efficiency as Allowed by MEEIA.	))))	File No. EO-2023-0136

NON-UNANIMOUS STIPULATION AND AGREEMENT REGARDING THE IMPLEMENTATION OF CERTAIN MEEIA 4 PROGRAMS THROUGH PLAN YEAR 2027, MOTION FOR EXPEDITED TREATMENT, AND REQUEST FOR VARIANCES

COME NOW Union Electric Company d/b/a Ameren Missouri ("Ameren Missouri" or the "Company"), the Office of the Public Counsel ("OPC"), Renew Missouri Advocates d/b/a Renew Missouri ("Renew Missouri"), Consumers Council (collectively referred to as "Signatories"), and submit this *Non-Unanimous Stipulation and Agreement Regarding the Implementation of Certain MEEIA 4 Programs through Plan Year 2027* (*"MEEIA 4 Stipulation"*) *and Motion for Expedited Treatment ("Motion"),* and *Request for Variance* (*"Request*") for approval by the Missouri Public Service Commission ("Commission").

In support of this *MEEIA 4 Stipulation* the Signatories respectfully state as follows:

BACKGROUND

1. On March 27, 2023, Ameren Missouri filed its *Application to Approve DSIM and Demand-Side Management Portfolio and Plan, Request for Variances, and Motion to Adopt Procedural Schedule*, together with a report, including associated appendices, entitled *Ameren Missouri 2024-26 MEEIA Energy Efficiency Plan* in this case under the Missouri Energy Efficiency Investment Act ("MEEIA") and the Commission's MEEIA rules for approval of its proposed MEEIA Cycle 4 plan. On August 3, 2023, as a result of settlement negotiations, Ameren Missouri entered into an agreement with several parties in File No. EO-2018-0211 for approval of

an extension of its MEEIA Cycle 3 Plan for the Program Year 2024. The resulting settlement was approved by the Commission in an order dated August 23, 2023.

2. As part of the settlement to extend MEEIA 3 in EO-2018-0211, the parties continued discussions on the MEEIA 4 Application. As a result of the discussions, a procedural schedule was agreed upon. Ameren Missouri submitted an *Amended and Supplemented Application to Approve DSIM and Demand-Side Management Portfolio and Plan, Request for Variances,* together with a report, including associated appendices, entitled *Ameren Missouri 2025-27 MEEIA Energy Efficiency Plan ("Revised")* ("MEEIA 4 Plan") on January 25, 2024.

3. After filing the amended MEEIA 4 Plan, several parties undertook discussions in anticipation of potential settlement of the issues. After testimony, hearing, and further negotiations, the Signatories agreed that the *MEEIA 4 Stipulation* could be implemented under certain terms and conditions through Program Year 2026 for Energy Efficiency Programs and through Program Year 2027, for Demand Response programs. In light of the foregoing, the Signatories to this *MEEIA 4 Stipulation* agree to the following terms and conditions.

SPECIFIC TERMS AND CONDITIONS

4. Budget. The Signatories agree that the following budget caps will apply for MEEIA 4 (table reflects millions of dollars):

Programs	2025*	2026*	2027	2028	Total by Program(s)
Income Eligible (see below)	10.00	10.00	-	-	20.00
Residential (see below)	10.00	10.00	-	-	20.00
Business (see below)	10.00	10.00	-	-	20.00
Demand Response ("DR")**	21.27	21.72	22.03	-	65.03
Total by Years	**51.27**	**51.72**	**22.03**	**-**	**125.03**
Residential DR	8.70	9.21	9.59	-	27.50
Business DR	12.57	12.51	12.45	-	37.53

** Excludes natural gas budgets from co-delivered programs and any amounts collected from the natural gas co-delivered programs will not be recovered through Rider EEIC and not included in the Earnings Opportunity.*
*** DR extends through 2/29/28 (equates to three Midcontinent Independent System Operator ("MISO") PRA years less spring 2028)*

The Company will not have a Portfolio contingency, and the budgets will be capped to the table as shown above. As discussed further below, the Company will have limited flexibility to redirect budgeted funds under the PAYS® program.

5. Earning Opportunity for non-demand response programs. The Company is including an EO calculator as Attachment A. The Company's earnings opportunity ("EO") from non-demand response programs is as follow:

- Caps:
  - For PAYS® and Multi-Family Income Eligible, EO will be capped at 15% of planned incentive and delivery spend, as modeled in Attachment A.
  - For Business, EO will be capped at 15% of planned incentive spend, as modeled in Attachment A.
  - For Single Family Income Eligible and Business Social Services, EO will be capped at 10% of planned incentive spend, as modeled in Attachment A.
  - For thermostats, EO will be capped at 15% of planned incentive spend, as modeled in Attachment A.
- Award
  - The amount of EO awarded for each category will be calculated using Ameren Missouri's actual incentive and delivery spend and will be in the same percentages identified above.

- Incentive(s) and Delivery cost(s) are defined as follows:

- **Delivery cost(s):** *Rebate (Incentive) Delivery Cost:*

    - Activities directly related to delivery of rebates to eligible rebate recipients including:
        - Equipment, tools, models, and procedures used to assess a home and estimate energy savings.
        - Equipment, tools, models, and procedures used to verify installations and perform quality control (QC) including inspections and reporting.
        - Customer service support relating to implementing the home report.
        - Consumer protection functions including consumer feedback, project verification and inspections.

- **Incentive(s):** *Reimbursement (Incentive) Cost:*

    - Reimbursement or providing a cost discount for eligible upgrades based on
        - a) energy savings,
        - b) pre-determined qualified upgrade amounts, or
        - c) total project costs.

- Attachment B reflects modeled incentive and delivery cost categories related to the programs, including those programs that are co-delivered.

6. Energy Efficiency Traditional Programs. The Company also will file an updated Program Templates document[1] with the Compliance tariffs within 30 days of the filing of this Stipulation and Agreement.

The Program Templates document will outline the portfolio of energy efficiency programs implemented for 2025 and 2026 program years. The portfolio includes the following programs:

- **Business program**

    - No lighting measures will be offered in the business program.

[1] This document will be similar to Revised Appendix B, which the Company filed in this docket on January 25, 2024. The updated document that the Company will file with the Compliance tariffs will reflect the programs as agreed to in this *MEEIA 4 Stipulation.* Any party may respond to this updated Program Templates document in accordance with the Commission's rules.

- Program design includes elements of business program design (e.g., Standard, Custom, Retro-Commissioning).
  - Business Retro-Commissioning is capped at $500,000 annually.
- Lighting controls can be considered, but annual expenditures are capped at no more than $250,000 of the $10 million Business budget.

- **Income Eligible**
  - Includes Multi-Family Income Eligible, Single-Family Income Eligible and Business Social Services.
  - Business Social Services to include lighting measure upgrades.
  - Evaluation, Measurement and Verification ("EM&V") to follow up on historical renter demographic changes.
  - Income Eligible spend cap is based on sum of spend and credits in electric and natural gas codelivery program.[2]

- **Residential PAYS® and Smart Thermostats**
  - Residential programs are limited to only PAYS® and Smart Thermostats
  - Modified PAYS® as articulated in the rebuttal testimony of OPC witness, Dr. Geoff Marke including FastPass, extending the length of payback, and allowing for early payoff.
  - Smart Thermostat only program to support Residential DR
    - Thermostat program budget cap at $1.5 million annually
  - Smart Thermostats can be included in PAYS® program but is dependent on customers putting up capital to move ahead with PAYS®
  - PAYS® funds may be redirected to other programs under the following parameters:
    - In 2025, no more than $5 million total
      - Up to $5 million of annual funding from PAYS® can be redirected to income eligible
      - Up to $500,000 of PAYS® can be redirected to business

[2] The Table on page 3 does not include codelivery credits.

- In 2026, no more than $4M total
  - Up to $4 million of annual funding from PAYS® can be redirected to income eligible
  - Up to $500,000 of PAYS® can be redirected to business
- In all years
  - Funding from PAYS® can be redirected to income eligible no earlier than July 1 of the relevant calendar year.
    - Earning Opportunity tied to these redirected funds is reduced to 10%
  - Funding from PAYS® can be redirected to business no earlier than August 1 of the relevant calendar year.
    - Earnings Opportunity tied to these redirected funds is reduced to 10%

7. <u>Demand Response and EO for Demand Response.</u>

- ***Business Demand Response**:*
  - EO is based on the basic premise that the available EO will be taken in each year and prorated to the four Midcontinent Independent System Operator ("MISO") seasons based on the Planning Resource Auction ("PRA") cleared[3] price in each season.
    - In the event MISO charges a penalty to Ameren Missouri for non-performance related to demand response, the EO will be adjusted by the MW amount of non-performance.
  - EO rate by season ($/cleared[4] and verified PRA Megawatt ("MW") "resource capability") = ($1,885,500/Seasonal MW Target) * ((cleared[5] PRA price by season) / (sum of cleared[6] PRA prices for planning year))
- Annual Earnings Opportunity Cap: $1,885,500

[3] Cleared PRA MW is subject to reduction based on non-performance adjustment related to demand response.
[4] *Id.*
[5] *Id.*
[6] *Id.*

        - The targets are 180 MW in Summer, 100 MW in Fall, 100 MW in Winter, and 100 MW in Spring

    - See Attachment C for details on seasonal MW targets and calculations. Attachment D outlines the process for determining the seasonal MISO data to input into Attachment C. The Company will provide workpapers to Staff and OPC showing how the EO rate is calculated using the MISO capacity resource clearing process.

    - The Parties agree to meet to discuss Business Demand Response seasonal targets no later than September 1, 2026. By September 1, 2025, Ameren agrees to provide Staff and OPC at least three options for potential changes to contracts with participants that aligns Business Demand Response participants' contracts with expected near term PRA conditions and Ameren Missouri's projected capacity position by season, including but not limited to aligning participation payments with relative seasonal PRA results. The alternative contract options will be accompanied with Ameren Missouri's preferred alternative, earliest implementation timelines, and be designed in a manner that cost-effectively improves the capability of the Business Demand Response Program in the MISO PRA seasons, considering the historical highest clearing prices for Ameren Missouri's Zone, Zone 5, as reflected in the MISO seasonal PRA results, forecasts of future PRA results, and Ameren Missouri's projected capacity position by PRA season.

- ***Residential Demand Response***:

    - EO Bonus
        - Based on events, $51,250 per event
        - Up to 15 events
        - No more than 5 test events will be included. The test events must be either:
            - Locational demand purposes, or
            - During a non-summer peaking period

- ***Additional Factors for Demand Response Evaluation Measurement, and Verification****:*
    - o No Throughput Disincentive will be recovered for Demand Response, including thermostats
    - o No kWh savings from thermostats installed or demand response programs as part of MEEIA cycle 4 will be included in the Throughput Disincentive for recovery through Rider EEIC.
    - o Company agrees to continue to provide quarterly updates and supporting workpapers regarding the number of events called and megawatts cleared for both residential and business demand response programs. For residential, results can be provided in the aggregate. For business, Ameren will indicate number of customers called upon and for each customer the associated megawatts and megawatts actually curtailed. Ameren will notify Signatories and Staff within five (5) business days after notification from MISO of any non-performance.

8. Throughput Disincentive and Net-to-Gross ("NTG"). The Signatories agree that the Throughput Disincentive for MEEIA 4 will be recovered through Rider EEIC and the Throughput Disincentive calculations in Rider EEIC and rebasing calculations in rate cases shall be performed consistent with the methodologies approved for Ameren Missouri's MEEIA 2019-21 programs (and as continued through the three one-year extensions of that program cycle).

    - o The Throughput Disincentive for the MEEIA 4 programs will utilize a net-to-gross ("NTG") factor of 100% for Business Social Services, both the Single and Multifamily Income Eligible programs, and PAYS®. The Business program will utilize a factor of 70%. There will not be a NTG true-up. The Company will not receive a Throughput Disincentive for kWh savings from smart thermostats and these kWh savings will not be recovered through Rider EEIC.

9. Evaluation, Measurement, and Verification ("EM&V"). EM&V will be conducted and will include the following considerations:

- A single EM&V Contractor will be utilized, and it will be administered by the Staff and funded through Rider EEIC.
- Retrospective renter analysis of historic income eligible multi-family demographics will be conducted
- The budget-will be scaled down proportionally to reflect revised portfolio budget, with the EM&V portion expected to be around 3% of the total annual budget.
- The terms of this Stipulation are only applicable to MEEIA Cycle 4 and parties will seek a variance from 20 CSR 4240-20.093(8) for the Cycle 4 EM&V. However, Staff's administration of the EM&V work will be done in accordance with the process set forth in the rule.
- Parties agree to work together and make a joint filing on a proposed EM&V Scope of Work.
- Parties agree that EM&V will include a formal change request process for parties to challenge results of EM&V process at the Commission.
- PAYS® process evaluation will be conducted along with AMI billing verification, for use in future portfolio years.
- A desktop audit of residential thermostats will be conducted based upon Advance Metering Infrastructure ("AMI") baseline and billing verification samples.
- A desktop audit of business Demand Response will be conducted based upon AMI baseline and billing verification samples for all participants and events. No kWh reductions from thermostats or demand response programs will be included in any rate case annualization or EEIC rebasing adjustment.

10. Statewide MEEIA Feasibility Study. The Signatories agree to conduct a Feasibility Study and to open a non-contested workshop docket with the following considerations:

- Up to $250,000[7] will be made available for a third-party statewide feasibility study
- Parties agree to work together to get an Request for Proposals issued for the Feasibility Study by the end of 2024.
- Results of the study will be filed in the non-contested workshop docket and a presentation of the findings will be made to the Commission at a future Agenda.
- Funding may be supplemented from other regulated utilities' MEEIA programs.
- This effort will include research and recommendations on roles, standards and risks with moving to a statewide program.

Statewide MEEIA Feasibility Study includes (but not limited to):

I. Literature review of statewide Demand Side Management ("DSM") programs:
   1) Governing structure
   2) Enabling legislative language
   3) Implementation policy and cost sharing
   4) Opportunities for bulk buying and scale economies
   5) Recommendations, timetable, and draft legislative language

II. Periodic Presentations to the Commission
   - Parties agree to present progress to date at a public Commission Agenda during the 4th quarter of 2024, 2025, and [if need be] 2026.
   - Nothing in this agreement precludes Parties from contesting the results or outcome of the Feasibility Study or recommending and/or evaluating other future energy efficiency programs or mechanisms in Missouri, besides the statewide program, in the uncontested workshop docket.
   - All parties will evaluate progress of the study by March 31, 2026. If the transition to a statewide program is deemed not to be viable to kick-off

[7] This amount is not part of the overall MEEIA 4 program budget referenced above and will be recovered from customers through the Demand Side Investment Mechanism ("DSIM").

in 2027, and if conditions at the time warrant an extension, all parties will engage in good faith discussions to extend the MEEIA 4 portfolio for additional years.

11. Technical Resource Manual ("TRM"), Incentive Ranges, and Deemed Savings Tables. The Signatories agree that:

- Ameren Missouri will remove measures from the TRM (any measures that are not included in the modeling for the programs above at minimum) (including removal of thermostat energy savings)
- Ameren Missouri will provide page/cell specific citation to sources
- The incentive range schedule will be aligned with available measures from TRM
- Ameren Missouri will file the updated TRM in File No. EO-2023-0136

12. Tariff Changes. Ameren Missouri shall:

- File tariff sheets for each approved program that includes at least the following information:
    1. Description of the purpose of the program including the desired outcome of implementation,
    2. Descriptions of availability for each program,
    3. Clear definitions of terms of the program, and
    4. Portfolio level budget, by year.
- Ameren Missouri will file Incentive ranges for programs (see Appendix D – Incentive Ranges in Amended Application).

13. Integrated Resource Plan. Ameren Missouri agrees to:

- Examine additional scenarios (e.g., less than Realistic Achievable Potential ("RAP")) in the next market potential study.
- If Ameren Missouri, in support of its next MEEIA application for program approval, proposes utilizing avoided capacity costs that are not the same as its projected MISO PRA capacity cost assumptions, Ameren agrees to provide alternative workpapers that utilize the projected MISO PRA capacity cost

assumptions for evaluating cost effectiveness at the timing of its direct filing and application.

GENERAL PROVISIONS

14. This *MEEIA 4 Stipulation* is being entered into solely for the purpose of settling the issues specifically set forth above, and represents a settlement on a mutually-agreeable outcome without resolution of specific issues of law or fact. This *MEEIA 4 Stipulation* is intended to relate *only* to the specific matters referred to herein; no Signatory waives any claim or right which it may otherwise have with respect to any matter not expressly provided for herein. No party will be deemed to have approved, accepted, agreed, consented, or acquiesced to any substantive or procedural principle, treatment, calculation, or other determinative issue underlying the provisions of this *MEEIA 4 Stipulation*. Except as specifically provided herein, no Signatory shall be prejudiced or bound in any manner by the terms of this *MEEIA 4 Stipulation* in any other proceeding, regardless of whether this *MEEIA 4 Stipulation* is approved.

15. This *MEEIA 4 Stipulation* has resulted from extensive negotiations, and the terms hereof are interdependent. If the Commission does not approve this *MEEIA 4 Stipulation*, approves it with modifications or conditions to which a party objects, or issues an order in another Commission case that negates its approval or conditions or modifies the *MEEIA 4 Stipulation* in a manner to which any party objects, then this *MEEIA 4 Stipulation* shall be null and void, and no Signatory shall be bound by any of its provisions.

16. If the Commission does not approve this *MEEIA 4 Stipulation* unconditionally and without modification, and notwithstanding its provision that it shall become void, neither this *MEEIA 4 Stipulation*, nor any matters associated with its consideration by the Commission, shall be considered or argued to be a waiver of the rights that any Signatory has for a decision in

accordance with Section 536.080 RSMo 2016 or Article V, Section 18 of the Missouri Constitution, and the Signatories shall retain all procedural and due process rights as fully as though this *MEEIA 4 Stipulation* had not been presented for approval, any suggestions or memoranda, testimony or exhibits that have been offered or received in support of this *MEEIA 4 Stipulation,* shall become privileged as reflecting the substantive content of settlement discussions and shall be stricken from and not be considered as part of the administrative or evidentiary record before the Commission for any further purpose whatsoever.

17. If the Commission unconditionally accepts the specific terms of this *MEEIA 4 Stipulation* without modification, the Signatories waive, with respect only to the issues resolved herein: their respective rights (1) their respective r2) their respective rights to seek rehearing pursuant to Section 386.500, RSMo 2016; and (3) their respective rights to judicial review pursuant to Section 386.510, RSMo 2019 Supp. These waivers apply only to a Commission order respecting this *MEEIA 4 Stipulation* issued in this above-captioned proceeding, and do not apply to any matters raised in any prior or subsequent Commission proceeding, or any matters not explicitly addressed by this *MEEIA 4 Stipulation*.

18. This *MEEIA 4 Stipulation* contains the entire agreement of the Signatories concerning the issues addressed herein.

19. This *MEEIA 4 Stipulation* does not constitute a contract with the Commission and is not intended to impinge upon any Commission claim, right, or argument by virtue of the *MEEIA 4 Stipulation's* approval. Acceptance of this *MEEIA 4 Stipulation* by the Commission shall not be deemed as constituting an agreement on the part of the Commission to forego the use of any discovery, investigative or other power which the Commission presently has or as an acquiescence of any underlying issue. Thus, nothing in this *MEEIA 4 Stipulation* is intended to impinge or

restrict in any manner the exercise by the Commission of any statutory right, including the right to access information, or any statutory obligation.

20. The Signatories agree that this *MEEIA 4 Stipulation*, except as specifically noted herein, resolves all issues related to these topics, and that the agreement should be received into the record without the necessity of any witness taking the stand for examination.

MOTION FOR EXPEDITED TREATMENT

21. Ameren Missouri requests expedited treatment of this Motion *and MEEIA 4 Stipulation* to effectuate the MEEIA 4 programs by January 1, 2025.[8] The request is being filed after consultation with and feedback from stakeholders and earlier than the requested implementation date of January 1, 2025. The Company respectfully requests approval as soon as possible, to allow Ameren Missouri the certainty for implementing the programs for the new program year, which will ensure continuity of the programs.

REQUEST FOR WAIVERS OR VARIANCES

22. In order to implement the terms of the *MEEIA 4 Stipulation* and administer the Demand Side Investment Mechanism and the portfolio of demand-side programs proposed in the MEEIA 4 Plan, Ameren Missouri will require waivers or variances from certain Commission rules. Therefore, in accordance with 20 CSR 4240-20.094(11), the Company seeks waivers or variances from 20 CSR 4240-20.094(2), in accordance with 20 CSR 4240-14.010(2) seeks a waiver or

[8] The other Signatories to this *MEEIA 4 Stipulation* do not take a position to this request.

variance from 20 CSR 4240-14.030(3),[9] and in accordance with Evaluation, Measurement, and Verification ("EM&V") provisions above, the Company seeks a waiver of_20 CSR 4240-20.093(8). The reasons Ameren Missouri requires each of these waivers or variances are as follows:

A. Waiver/Variance Related to Annual Energy and Demand Savings Goals: Rule 20 CSR 4240-20.094(2) prescribes guidelines to review progress toward the expectation an electric utility's demand-side programs can achieve a goal of overall cost-effective demand-side savings. However, the rule expressly states that the prescribed guidelines are not mandatory, and no penalty or other adverse consequence will result if a utility is unable to achieve annual savings goals specified in those guidelines. To eliminate any confusion regarding whether Ameren Missouri's MEEIA 4 Plan programs are required to meet those "soft" goals related to kWh and kW load reductions, the Company seeks a waiver of this rule. Alternatively, the Commission could include a statement in its final order approving the MEEIA 4 Plan that Ameren Missouri will not be penalized in any way if it fails to meet goals expressed in the rule's guidelines.

B. Waiver/Variance Related to Promotional Practices: Rule 20 CSR 4240-14.030(3) states, in relevant part, an electric utility is prohibited from implementing any new promotional practice until after a tariff related to that practice has been filed with the Commission. The MEEIA 4 Plan anticipates the Company will be required to change certain elements of its promotional practices – most notably incentive payments – to reflect marketplace changes. Requiring Ameren

[9] Waivers of the requirements of 20 CSR 4240-14.030(3) and 20 CSR 4240-20.094(2)formerly 4 CSR 240-094(2), and 4 CSR 240-14.030(3)), on similar or even the same basis, were previously requested in the *Non-Unanimous Stipulation and Agreement* submitted in Ameren Missouri's MEEIA Cycle 2 Plan (File No. EO-2015-0055) on February 5, 2016, and were approved through the Commission's *Order Approving Non-Unanimous Stipulation and Agreement* issued February 10, 2016, and requested in Ameren Missouri's MEEIA 3 Plan (File No. EO-2018-0211) and approved through the Commission's *Order Approving Stipulation and Agreement and Granting Waivers* issued on December 5, 2018, and effective January 4, 2019.

Missouri to file tariffs before such changes can be implemented would be burdensome and would prevent the Company from quickly addressing conditions the promotional practice changes were designed to address. A waiver of this rule is necessary to give Ameren Missouri the administrative flexibility necessary to timely address marketplace changes so its MEEIA 4 Plan can achieve its objective of reducing energy use and demand as cost-effectively as possible.

C. Waiver/Variance Related to Evaluation, Measurement and Verification (EM&V): Rule 20 CSR 4240-20.093(8) states, in relevant part, that "each electric utility shall hire an independent contractor to perform and report EM&V of each commission approved demand-side program. . ." The Signatories request that the Commission waive the requirement that the Company hire an independent contractor to perform and report EM&V, and instead, allow the Commission Staff to hire an independent contractor to perform and report EM&V. Commission Staff's administration of the EM&V work will be done in accordance with the process set forth in 20 CSR 4240-20.093(8).

WHEREFORE, the Signatories respectfully request that the Commission approve the Stipulation and Agreement to implement the DSIM and the MEEIA 4 Plan, grant the waivers or variances requested in this application, and grant the request for expedited approval.

Respectfully submitted,

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CERTIFICATE OF SERVICE

The undersigned hereby certifies that a true and correct copy of the foregoing was served on all parties of record via electronic mail (e-mail) on this 30th day of October, 2024.

/s/ ***Jennifer S. Moore***
Jennifer S. Moore