

**STATE OF MISSOURI
PUBLIC SERVICE COMMISSION**

At a session of the Public Service Commission held at its office in Jefferson City on the 14th day of November, 2024.

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

**ORDER APPROVING NON-UNANIMOUS STIPULATION AND
AGREEMENT**

Issue Date: November 14, 2024

Effective Date: November 24, 2024

Background

On March 27, 2023, Union Electric Company d/b/a Ameren Missouri filed its Application to Approve Demand-Side Investment Mechanism (DSIM) and Demand-Side Management Portfolio and Plan. Ameren Missouri amended its application on January 25, 2024.

The Commission provided notice, and granted intervention to: Consumers Council of Missouri (CCM), Midwest Energy Consumers Group (MECG), Natural Resources Defense Council (NRDC), and Renew Missouri. The Commission held an evidentiary hearing on July 22-25, 2024.

Stipulation

On October 30, 2024, Ameren Missouri, Office of the Public Counsel (OPC), Renew Missouri, and CCM filed a Non-Unanimous Stipulation and Agreement (Stipulation). Contemporaneously therewith, Ameren Missouri filed a Motion for Expedited Treatment, asking for approval so that the Missouri Energy Efficiency Act (MEEIA) programs listed in the Stipulation can go into effect no later than January 1, 2025. To implement the Stipulation, Ameren Missouri also requests waivers of Commission Rules 20 CSR 4240-20.094(2), 20 CSR 4240-14.030(3), and Rule 20 CSR 4240-20.093(8).

NRDC objected to the Stipulation on November 5, 2024. NRDC then withdrew its objection on November 8, 2024.

Decision

Commission Rule 20 CSR 4240-2.115 allows the Commission to treat a non-unanimous stipulation as if it were unanimous if no party objects. Because no party objects, the Commission will treat the Stipulation as unanimous.

Under MEEIA, and with Commission approval, electric utilities may offer demand-side programs and special incentives to participating customers designed to put demand-side initiatives on equal footing with traditional supply-side resources. In order to accomplish that equal footing, the law requires the Commission to do three things:

- (1) Provide timely cost recovery for utilities;
- (2) Ensure that utility financial incentives are aligned with helping customers to use energy more efficiently and in a manner that sustains or enhances utility customers' incentives to use energy more efficiently; and
- (3) Provide timely earnings opportunities associated with cost-effective measurable and verifiable savings.¹

¹ Section 393.1075.3 RSMo.

Based on the Commission's impartial and independent review of the Stipulation, the Commission finds that the Stipulation meets the afore-mentioned MEEIA standards. Therefore, the Commission will approve the Stipulation, and will grant the requested variances. So that Ameren Missouri may begin implementing its MEEIA programs expeditiously, the Commission finds good cause to make this order effective in less than 30 days. The Commission thanks and commends all the parties for their diligent work in negotiating a stipulation that meets Missouri's MEEIA goals of assisting customers to use energy more efficiently.

THE COMMISSION ORDERS THAT:

1. The MEEIA Cycle 4 Plan filed by Ameren Missouri, as amended by the Stipulation, which is Exhibit 1 to this order, is approved.
2. The Stipulation filed is approved, and its signatories shall comply with its terms.
3. The motion for expedited treatment is granted.
4. Ameren Missouri has shown good cause for the requested variance of Commission Rules 20 CSR 4240-20.094(2), 20 CSR 4240-14.030(3), and Rule 20 CSR 4240-20.093(8), and the Commission grants variances of those rules.
5. This order shall become effective on November 24, 2024.



BY THE COMMISSION

Nancy Dippell

Nancy Dippell
Secretary

Hahn, Ch., Coleman, Holsman
Kolkmeier, and Mitchell CC., concur.

Pridgin, Deputy Chief Regulatory Law Judge

**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) File No. EO-2023-0136
Regulatory Changes in Furtherance of Energy)
Efficiency as Allowed by MEEIA.)

**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 document¹ 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. Demand Response and EO for Demand Response.

- ***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") cleared³ 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 (\$/cleared⁴ and verified PRA Megawatt ("MW") "resource capability") = (\$1,885,500/Seasonal MW Target) * ((cleared⁵ PRA price by season) / (sum of cleared⁶ 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:*

- No Throughput Disincentive will be recovered for Demand Response, including thermostats
- 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.
- 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).

- 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 \$250,000⁷ 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,

/s/ Jennifer S. Moore

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**ATTORNEYS FOR RENEW MISSOURI
ADVOCATES D/B/A RENEW MISSOURI**

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

Energy Efficiency Earnings Opportunity Calculation:

Energy Efficiency Portfolio - EO	2025				2026			
	Incentive	Delivery	EO %	EO	Incentive	Delivery	EO %	EO
Residential								
PAYS	\$5,128,182	\$2,207,343	15%	\$ 1,100,329	\$5,128,182	\$2,207,343	15%	\$ 1,100,329
EP-Tstats	\$955,500	N/A	15%	\$ 143,325	\$955,500	N/A	15%	\$ 143,325
Income Eligible***								
MFIE	\$4,223,780	\$1,085,999	15%	\$ 796,467	\$4,223,780	\$1,085,999	15%	\$ 796,467
SFIE	\$1,132,058	N/A	10%	\$ 113,206	\$1,132,058	N/A	10%	\$ 113,206
BSS	\$1,680,000	N/A	10%	\$ 168,000	\$1,680,000	N/A	10%	\$ 168,000
Business EE								
Custom	\$2,800,000	N/A	15%	\$ 420,000	\$2,800,000	N/A	15%	\$ 420,000
Standard	\$4,200,000	N/A	15%	\$ 630,000	\$4,200,000	N/A	15%	\$ 630,000
PAYS® Redirected Funds								
Income Eligible**	\$0	\$0	10%	\$ -	\$0	\$0	10%	\$ -
Business EE***	\$0	N/A	10%	\$ -	\$0	N/A	10%	\$ -
TOTAL EE EO (Portfolio Cap)				\$ 3,371,326				\$ 3,371,326

*Excludes natural gas budgets from co-delivered programs.

** Up to \$5M and \$4M of annual funding from PAYS® can be redirected to income eligible programs in 2025 and 2026 respectively

***Up to \$500K of PAYS® can be redirected to business

Inputs to the Calculations

Demand Response Earnings Opportunity Calculation:

Demand Response Portfolio - EO					2025				2026				2027									
Residential DR					\$/Event	# Events	2025 EO			\$/Event	# Events	2026 EO			\$/Event	# Events	2027 EO					
Residential DR Events (up to 15)					\$51,250	15	\$ 768,750			\$51,250	15	\$ 768,750			\$51,250	15	\$ 768,750					
Business DR					Seasonal MW Target	PRA cleared prices \$/MW-day	Cleared MW	2025 Calculated EO			Seasonal MW Target	PRA cleared prices \$/MW-day	Cleared MW	2026 Calculated EO			Seasonal MW Target	PRA cleared prices \$/MW-day	Cleared MW	2027 Calculated EO		
PRA Season																						
Winter					100	\$230.00	\$100.00	\$912,978.95			100	\$230.00	\$100.00	\$912,978.95			100	\$230.00	\$100.00	\$912,978.95		
Spring					100	\$230.00	\$100.00	\$912,978.95			100	\$230.00	\$100.00	\$912,978.95			100	\$230.00	\$100.00	\$912,978.95		
Summer					180	\$5.00	\$180.00	\$19,847.37			180	\$5.00	\$180.00	\$19,847.37			180	\$5.00	\$180.00	\$19,847.37		
Fall					100	\$10.00	\$100.00	\$39,694.74			100	\$10.00	\$100.00	\$39,694.74			100	\$10.00	\$100.00	\$39,694.74		
Business DR EO Total						\$475.00		\$ 1,885,500				\$475.00		\$ 1,885,500				\$475.00		\$ 1,885,500		
TOTAL EO (Residential + Business)								\$ 2,654,250						\$ 2,654,250						\$ 2,654,250		

Inputs to the Calculations

Business Demand Response EO Structure and examples below:

Basic premise is to take the available EO in each year, and prorate it to the four MISO seasons based on the PRA cleared price in each season.

$$\text{EO rate by season (\$/cleared and verified PRA MW)} = \$ 1,885,500 \times \frac{\text{Cleared PRA price by season}}{\text{Seasonal MW Target} \times \text{sum of cleared PRA prices for planning year}}$$

Annual target EO	\$ 1,885,500
EO cap	0.15
Seasonal MW Target	\$ 1,885,500
Summer	180
Fall	100
Winter	100
Spring	100

Examples	PRA cleared prices \$/MW-day				EO available by season (target)			
	Winter	Spring	Summer	Fall	Winter	Spring	Summer	Fall
Example 1	10	10	5	50	\$ 251,400	\$ 251,400	\$ 125,700	\$ 1,257,000
Example 2	230	230	5	10	\$ 912,979	\$ 912,979	\$ 19,847	\$ 39,695
Example 3	5	230	15	230	\$ 19,641	\$ 903,469	\$ 58,922	\$ 903,469
Example 4	10	5	230	20	\$ 71,151	\$ 35,575	\$ 1,636,472	\$ 142,302

difference from annual target

Examples	EO available per MW for season				Cleared MW			
	Winter	Spring	Summer	Fall	Winter	Spring	Summer	Fall
Example 1	\$ 2,514.00	\$ 2,514.00	\$ 688.33	\$ 12,570.00	100	100	180	100
Example 2	\$ 9,129.79	\$ 9,129.79	\$ 110.26	\$ 396.95	90	90	150	90
Example 3	\$ 196.41	\$ 9,034.69	\$ 327.34	\$ 9,034.69	140	150	200	140
Example 4	\$ 711.51	\$ 355.75	\$ 9,091.51	\$ 1,423.02	100	80	200	80

Calculation of EO					Potential EO	Actual EO
Winter	Spring	Summer	Fall			
\$ 251,400	\$ 251,400	\$ 125,700	\$ 1,257,000	\$ 1,885,500	\$ 1,885,500	\$ 1,885,500
\$ 730,383	\$ 730,383	\$ 16,539	\$ 31,756	\$ 1,509,062	\$ 1,509,062	\$ 1,509,062
\$ 27,497	\$ 1,355,203	\$ 65,469	\$ 1,284,856	\$ 2,713,025	\$ 1,885,500	\$ 1,885,500
\$ 71,151	\$ 28,460	\$ 1,818,302	\$ 113,842	\$ 2,031,755	\$ 1,885,500	\$ 1,885,500

* In the event MISO charges a penalty to AMO for non-performance related to demand response, the EO will be adjusted by the MW amount of non-performance.
 ** Cleared PRA MW is subject to reduction based on non-performance adjustment related to demand response.

Total Program Costs (All costs allocated) [1,2,4]				
(In Millions of Dollars)				
Portfolio	2025	2026	2027	Total
Income Eligible	\$ 10.00	\$ 10.00	\$ -	\$ 20.00
Demand Response	\$ 21.27	\$ 21.72	\$ 22.03	\$ 65.02
Residential	\$ 10.00	\$ 10.00	\$ -	\$ 20.00
Business	\$ 10.00	\$ 10.00	\$ -	\$ 20.00
Portfolio Total	\$ 51.27	\$ 51.72	\$ 22.03	\$ 125.02
Income Eligible				
Multi-Family Income Eligible	\$ 6.00	\$ 6.00	\$ -	\$ 12.00
Single-Family Income Eligible	\$ 2.00	\$ 2.00	\$ -	\$ 4.00
Business Social Services	\$ 2.00	\$ 2.00	\$ -	\$ 4.00
Income Eligible Total	\$ 10.00	\$ 10.00	\$ -	\$ 20.00
Demand Response				
Residential Demand Response	\$ 8.70	\$ 9.21	\$ 9.59	\$ 27.50
Business Demand Response [3] **				
Demand Response Total **				
Residential				
Efficient Products	\$ 1.50	\$ 1.50	\$ -	\$ 3.00
PAYS	\$ 8.50	\$ 8.50	\$ -	\$ 17.00
Residential Total	\$ 10.00	\$ 10.00	\$ -	\$ 20.00
Business				
Business Total	\$ 10.00	\$ 10.00	\$ -	\$ 20.00

Notes:

[1] Other Portfolio costs (EM&V & Other Portfolio Cost) have been distributed among the programs.

[2] Because of rounding, the numbers in these tables may not sum properly. Please see Ameren Missouri's workpapers for necessary clarification regarding these sums.

[3] **Highly Confidential**

[4] Program Cost above 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.

Total Program Costs (EM&V + Other Portfolio Costs unallocated) [1,3]				
(In Millions of Dollars)				
Portfolio	2025	2026	2027	Total
Income Eligible	\$ 9.23	\$ 9.33	\$ -	\$ 18.56
Demand Response	\$ 20.12	\$ 20.68	\$ 21.03	\$ 61.83
Residential	\$ 9.23	\$ 9.33	\$ -	\$ 18.56
Business	\$ 9.23	\$ 9.33	\$ -	\$ 18.56
Portfolio Costs	\$ 3.46	\$ 3.04	\$ 1.00	\$ 7.50
Portfolio Total	\$ 51.27	\$ 51.72	\$ 22.03	\$ 125.02
Income Eligible				
Multi-Family Income Eligible	\$ 5.54	\$ 5.60	\$ -	\$ 11.14
Single-Family Income Eligible	\$ 1.85	\$ 1.87	\$ -	\$ 3.71
Business Social Services	\$ 1.85	\$ 1.87	\$ -	\$ 3.71
Income Eligible Total	\$ 9.23	\$ 9.33	\$ -	\$ 18.56
Demand Response				
Residential Demand Response	\$ 8.03	\$ 8.60	\$ 8.95	\$ 25.57
Business Demand Response [2]	**	**	**	**
Demand Response Total	**	**	**	**
Residential				
Efficient Products	\$ 1.38	\$ 1.40	\$ -	\$ 2.78
PAYS	\$ 7.85	\$ 7.93	\$ -	\$ 15.78
Residential Total	\$ 9.23	\$ 9.33	\$ -	\$ 18.56
Business				
Business Total	\$ 9.23	\$ 9.33	\$ -	\$ 18.56
EM&V & Other Portfolio				
EM&V Cost	\$ 1.43	\$ 1.46	\$ 0.63	\$ 3.53
Marketing, Incremental Labor, Potential Study	\$ 2.02	\$ 1.58	\$ 0.37	\$ 3.97
EM&V & Other Portfolio Total	\$ 3.46	\$ 3.04	\$ 1.00	\$ 7.50

Notes:

[1] Because of rounding, the numbers in these tables may not sum properly. Please see Ameren Missouri's workpapers for necessary clarification regarding these sums.

[2] **Highly Confidential**

[3] Program Cost above 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.

Contractor Administrative Costs [1]				
(In Millions of Dollars)				
Portfolio	2025	2026	2027	Total
Income Eligible	\$ 0.55	\$ 0.63	\$ -	\$ 1.19
Demand Response	\$ 2.05	\$ 2.06	\$ 2.08	\$ 6.20
Residential	\$ 0.84	\$ 0.94	\$ -	\$ 1.78
Business	\$ 1.18	\$ 1.24	\$ -	\$ 2.42
Portfolio Total	\$ 4.63	\$ 4.87	\$ 2.08	\$ 11.59
Income Eligible				
Multi-Family Income Eligible	\$ 0.23	\$ 0.29	\$ -	\$ 0.52
Single-Family Income Eligible	\$ 0.24	\$ 0.25	\$ -	\$ 0.49
Business Social Services	\$ 0.08	\$ 0.09	\$ -	\$ 0.18
Income Eligible Total	\$ 0.55	\$ 0.63	\$ -	\$ 1.19
Demand Response				
Residential Demand Response	\$ 1.57	\$ 1.65	\$ 1.67	\$ 4.89
Business Demand Response [2]**				
Demand Response Total **				
Residential				
Efficient Products	\$ 0.33	\$ 0.34	\$ -	\$ 0.67
PAYS	\$ 0.51	\$ 0.60	\$ -	\$ 1.11
Residential Total	\$ 0.84	\$ 0.94	\$ -	\$ 1.78
Business				
Business Total	\$ 1.18	\$ 1.24	\$ -	\$ 2.42

Notes:

[1] Because of rounding, the numbers in these tables may not sum properly. Please see Ameren Missouri's workpapers for necessary clarification regarding these sums.

[2] **Highly Confidential**

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Incentive Costs [1]				
(In Millions of Dollars)				
Portfolio	2025	2026	2027	Total
Income Eligible	\$ 7.04	\$ 7.04	\$ -	\$ 14.07
Demand Response	\$ 11.51	\$ 11.80	\$ 12.06	\$ 35.38
Residential	\$ 6.08	\$ 6.08	\$ -	\$ 12.17
Business	\$ 7.00	\$ 7.00	\$ -	\$ 14.00
Portfolio Total	\$ 31.63	\$ 31.92	\$ 12.06	\$ 75.62
Income Eligible				
Multi-Family Income Eligible	\$ 4.22	\$ 4.22	\$ -	\$ 8.45
Single-Family Income Eligible	\$ 1.13	\$ 1.13	\$ -	\$ 2.26
Business Social Services	\$ 1.68	\$ 1.68	\$ -	\$ 3.36
Income Eligible Total	\$ 7.04	\$ 7.04	\$ -	\$ 14.07
Demand Response				
Residential Demand Response	\$ 2.46	\$ 2.75	\$ 3.01	\$ 8.23
Business Demand Response [2]**				
Demand Response Total **				
Residential				
Efficient Products	\$ 0.96	\$ 0.96	\$ -	\$ 1.91
PAYS	\$ 5.13	\$ 5.13	\$ -	\$ 10.26
Residential Total	\$ 6.08	\$ 6.08	\$ -	\$ 12.17
Business				
Business Total	\$ 7.00	\$ 7.00	\$ -	\$ 14.00

Notes:

[1] Because of rounding, the numbers in these tables may not sum properly. Please see Ameren Missouri's workpapers for necessary clarification regarding these sums.

[2] **Highly Confidential**

Program Delivery Costs [1]				
(In Millions of Dollars)				
Portfolio	2025	2026	2027	Total
Income Eligible	\$ 1.64	\$ 1.66	\$ -	\$ 3.31
Demand Response	\$ 6.55	\$ 6.82	\$ 6.88	\$ 20.26
Residential	\$ 2.31	\$ 2.31	\$ -	\$ 4.62
Business	\$ 1.05	\$ 1.10	\$ -	\$ 2.14
Portfolio Total	\$ 11.55	\$ 11.89	\$ 6.88	\$ 30.32
Income Eligible				
Multi-Family Income Eligible	\$ 1.09	\$ 1.09	\$ -	\$ 2.17
Single-Family Income Eligible	\$ 0.47	\$ 0.49	\$ -	\$ 0.96
Business Social Services	\$ 0.08	\$ 0.09	\$ -	\$ 0.18
Income Eligible Total	\$ 1.64	\$ 1.66	\$ -	\$ 3.31
Demand Response				
Residential Demand Response	\$ 4.00	\$ 4.20	\$ 4.26	\$ 12.45
Business Demand Response [2]**				
Demand Response Total **				
Residential				
Efficient Products	\$ 0.10	\$ 0.10	\$ -	\$ 0.20
PAYS	\$ 2.21	\$ 2.21	\$ -	\$ 4.41
Residential Total	\$ 2.31	\$ 2.31	\$ -	\$ 4.62
Business				
Business Total	\$ 1.05	\$ 1.10	\$ -	\$ 2.14

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Notes:

[1] Because of rounding, the numbers in these tables may not sum properly. Please see Ameren Missouri's workpapers for necessary clarification regarding these sums.

[2] **Highly Confidential**

EM&V Costs [1]				
(In Millions of Dollars)				
Portfolio	2025	2026	2027	Total
Income Eligible	\$ 0.28	\$ 0.28	\$ -	\$ 0.56
Demand Response	\$ 0.60	\$ 0.62	\$ 0.63	\$ 1.85
Residential	\$ 0.28	\$ 0.28	\$ -	\$ 0.56
Business	\$ 0.28	\$ 0.28	\$ -	\$ 0.56
Portfolio Total	\$ 1.43	\$ 1.46	\$ 0.63	\$ 3.53
Income Eligible				
Multi-Family Income Eligible	\$ 0.17	\$ 0.17		\$ 0.33
Single-Family Income Eligible	\$ 0.06	\$ 0.06		\$ 0.11
Business Social Services	\$ 0.06	\$ 0.06		\$ 0.11
Income Eligible Total	\$ 0.28	\$ 0.28	\$ -	\$ 0.56
Demand Response				
Residential Demand Response	\$ 0.24	\$ 0.26	\$ 0.27	\$ 0.77
Business Demand Response [2] **				
Demand Response Total **				
Residential				
Efficient Products	\$ 0.04	\$ 0.04		\$ 0.08
PAYS	\$ 0.24	\$ 0.24		\$ 0.47
Residential Total	\$ 0.28	\$ 0.28	\$ -	\$ 0.56
Business				
Business Total	\$ 0.28	\$ 0.28	\$ -	\$ 0.56

Notes:

[1] Because of rounding, the numbers in these tables may not sum properly. Please see Ameren Missouri's workpapers for necessary clarification regarding these sums.

[2] **Highly Confidential**

Other Portfolio Costs [1]				
(Marketing, Potential Study, Data Tracking & Incremental Labor)				
(In Dollars)				
Portfolio	2025	2026	2027	Total
Income Eligible	\$ 491,431	\$ 387,583	\$ -	\$ 879,014
Demand Response	\$ 547,935	\$ 417,354	\$ 371,505	\$ 1,336,794
Residential	\$ 491,431	\$ 387,583	\$ -	\$ 879,014
Business	\$ 491,431	\$ 387,583	\$ -	\$ 879,014
Portfolio Total	\$ 2,022,227	\$ 1,580,103	\$ 371,505	\$ 3,973,835
Income Eligible				
Multi-Family Income Eligible	294,859	232,550		\$ 527,408
Single-Family Income Eligible	98,286	77,517		\$ 175,803
Business Social Services	98,286	77,517		\$ 175,803
Income Eligible Total	\$ 491,431	\$ 387,583	\$ -	\$ 879,014
Demand Response				
Residential Demand Response	427,545	356,964	371,505	\$ 1,156,014
Business Demand Response [2]	**			**
Demand Response Total	**			**
Residential				
Efficient Products	73,715	58,137		\$ 131,852
PAYS	417,716	329,445		\$ 747,162
Residential Total	\$ 491,431	\$ 387,583	\$ -	\$ 879,014
Business				
Business Total	\$ 491,431	\$ 387,583	\$ -	\$ 879,014

Notes:

[1] Because of rounding, the numbers in these tables may not sum properly. Please see Ameren Missouri's workpapers for necessary clarification regarding these sums.

[2] **Highly Confidential**

Incremental Gross MWh Savings [1]				
Portfolio	2025	2026	2027	Total
Income Eligible	16,808	16,632	-	33,440
Demand Response	-	-	-	-
Residential	17,668	17,647	-	35,315
Business	30,377	30,377	-	60,753
Portfolio Total	64,852	64,656	-	129,508
Income Eligible				
Multi-Family Income Eligible	9,352	9,350	-	18,703
Single-Family Income Eligible	4,994	4,821	-	9,815
Business Social Services	2,461	2,461	-	4,923
Income Eligible Total	16,808	16,632	-	33,440
Demand Response				
Residential Demand Response	-	-	-	-
Business Demand Response [2]	-	-	-	-
Demand Response Total	-	-	-	-
Residential				
Efficient Products	4,408	4,408	-	8,816
PAYS	13,260	13,239	-	26,499
Residential Total	17,668	17,647	-	35,315
Business				
Business Total	30,377	30,377	-	60,753

Notes:

[1] Because of rounding, the numbers in these tables may not sum properly. Please see Ameren Missouri's workpapers for necessary clarification regarding these sums.

[2] **Highly Confidential**

Incremental Gross MW Savings [1,2]				
Portfolio	2025	2026	2027	Total
Income Eligible	4.68	4.66	-	9.33
Demand Response	246.25	252.55	258.66	258.66
Residential	7.98	7.97	-	15.95
Business	16.02	16.02	-	32.03
Portfolio Total	274.92	281.20	258.66	315.98
Income Eligible				
Multi-Family Income Eligible	3.30	3.30	-	6.60
Single-Family Income Eligible	0.88	0.86	-	1.75
Business Social Services	0.50	0.50	-	0.99
Income Eligible Total	4.68	4.66	-	9.33
Demand Response				
Residential Demand Response	66.25	72.55	78.66	78.66
Business Demand Response	180.00	180.00	180.00	180.00
Demand Response Total	246.25	252.55	258.66	258.66
Residential				
Efficient Products	1.67	1.67	-	3.34
PAYS	6.31	6.30	-	12.61
Residential Total	7.98	7.97	-	15.95
Business				
Business Total	16.02	16.02	-	32.03

Notes:

[1] Demand Response savings only are shown as cumulative values, all others are incremental savings.

[2] Because of rounding, the numbers in these tables may not sum properly. Please see Ameren Missouri's workpapers for necessary clarification regarding these sums.

Incremental Net MWh Savings [1]				
Portfolio	2025	2026	2027	Total
Income Eligible	16,808	16,632	-	33,440
Demand Response [2]	-	-	-	-
Residential	13,260	13,239	-	26,499
Business	21,264	21,264	-	42,527
Portfolio Total	51,331	51,135	-	102,466
Income Eligible				
Multi-Family Income Eligible	9,352	9,350	-	18,703
Single-Family Income Eligible	4,994	4,821	-	9,815
Business Social Services	2,461	2,461	-	4,923
Income Eligible Total	16,808	16,632	-	33,440
Demand Response [2]				
Residential Demand Response	-	-	-	-
Business Demand Response	-	-	-	-
Demand Response Total	-	-	-	-
Residential				
Efficient Products [3]	-	-	-	-
PAYS	13,260	13,239	-	26,499
Residential Total	13,260	13,239	-	26,499
Business				
Business Total	21,264	21,264	-	42,527

Notes:

[1] Because of rounding, the numbers in these tables may not sum properly. Please see Ameren Missouri's workpapers for necessary clarification regarding these sums.

[2] No kWh savings counted in the Throughput Disincentive for recovery through Rider EEIC from Demand Response or Efficient Products (smart thermostats) installed as part of MEEIA cycle 4.

Incremental Net MW Savings [1]				
Portfolio	2025	2026	2027	Total
Income Eligible	4.68	4.66	-	9.33
Demand Response [2]	246.25	252.55	258.66	258.66
Residential	6.31	6.30	-	12.61
Business	11.21	11.21	-	22.42
Portfolio Total	268.45	274.72	258.66	303.02
Income Eligible				
Multi-Family Income Eligible	3.30	3.30	-	6.60
Single-Family Income Eligible	0.88	0.86	-	1.75
Business Social Services	0.50	0.50	-	0.99
Income Eligible Total	4.68	4.66	-	9.33
Demand Response [2]				
Residential Demand Response	66.25	72.55	78.66	78.66
Business Demand Response [3]	180.00	180.00	180.00	180.00
Demand Response Total	246.25	252.55	258.66	258.66
Residential				
Efficient Products	-	-	-	-
PAYS	6.31	6.30	-	12.61
Residential Total	6.31	6.30	-	12.61
Business				
Business Total	11.21	11.21	-	22.42

Notes:

[1] Demand Response savings only are shown as cumulative values, all others are incremental savings.

[2] No kWh savings counted in the Throughput Disincentive for recovery through Rider EEIC from Demand Response or Efficient Products (smart thermostats) installed as part of MEEIA cycle 4.

kWh Net to Gross (%) [1]				
Portfolio	2025	2026	2027	Total
Income Eligible	100.0%	100.0%		100.0%
Demand Response [2]				
Residential	75.1%	75.0%		75.0%
Business	70.0%	70.0%		70.0%
Portfolio Total	79.2%	79.1%		79.1%
Income Eligible				
Multi-Family Income Eligible	100.0%	100.0%		100.0%
Single-Family Income Eligible	100.0%	100.0%		100.0%
Business Social Services	100.0%	100.0%		100.0%
Income Eligible Total	100.0%	100.0%		100.0%
Demand Response [2]				
Residential Demand Response				
Business Demand Response				
Demand Response Total				
Residential				
Efficient Products [2]	0.0%	0.0%		0.0%
PAYS	100.0%	100.0%		100.0%
Residential Total	75.1%	75.0%		75.0%
Business				
Business Total	70.0%	70.0%		70.0%

Notes:

[1] Because of rounding, the numbers in these tables may not sum properly. Please see Ameren Missouri's workpapers for necessary clarification regarding these sums.

[2] No kWh savings counted in the Throughput Disincentive for recovery through Rider EEIC from Demand Response or Efficient Products (smart thermostats) installed as part of MEEIA cycle 4.

**Attachment C
EO-2023-0136**

Basic premise is to take the available EO in each year, and prorate it to the four MISO seasons based on the PRA cleared price in each season.¹

EO rate by season (\$/cleared and verified PRA MW) =	$\frac{\$ 1,885,500}{\text{Seasonal MW Target}}$	x	$\frac{\text{cleared** PRA price by season}}{\text{sum of cleared PRA prices for planning year}}$	Annual target EO	\$ 1,885,500
					0.15
				EO cap	\$ 1,885,500
				Seasonal MW Target	
				Summer	180
				Fall	100
				Winter	100
				Spring	100

PRA	PRA cleared** prices \$/MW-day			
	Winter	Spring	Summer	Fall
2025-2026	10	10	30	50

EO available by season (target)				
Winter	Spring	Summer	Fall	
\$ 188,550	\$ 188,550	\$ 565,650	\$ 942,750	\$ -
difference from annual target				

PRA	EO available per MW for season			
	Winter	Spring	Summer	Fall
Example 1	\$ 1,885.50	\$ 1,885.50	\$ 3,142.50	\$ 9,427.50

PRA Cleared** MW			
Winter	Spring	Summer	Fall
100	100	146.2	100

Calculation of EO					
Winter	Spring	Summer	Fall	Potential EO	Actual EO
\$ 188,550	\$ 188,550	\$ 459,434	\$ 942,750	\$ 1,779,284	\$ 1,779,284

* In the event MISO charges a penalty to AMO for non-performance related to demand response, the EO will be adjusted by the MW amount of non-performance

** Cleared PRA MW is subject to reduction based on non-performance adjustment related to demand response

Business Demand Response Earnings Opportunity – Process Narrative

Intent

This document will lay out the steps and data needed to calculate the earnings opportunity (EO) for Business Demand Response for EO-2023-0136

Details

- Accreditation happens in February of each year, providing Ameren Missouri knowledge of what the Company can offer into the upcoming Midcontinent Independent System Operator (MISO) Planning Resource Auction (PRA).
- The PRA closes at the end of March (e.g., 3/31/25) each year, with results posting towards the end of April (e.g., 4/28/25).
 - The PY25 – 26 timeline is attached as Attachment D-1 "PY25026 PRA Timeline" for reference.
- Once results are posted, Ameren Missouri will provide workpapers with the "[MISO MECT – Auction Results](#)"¹ and calculate the Earnings Opportunity using the following steps:
 - Apply the applicable MISO "Season"
 - Provide support showing the Demand Response Load cleared the market. If the Company cannot provide the support, then the Demand Response Load will not be considered to be cleared.
 - The two data points needed for each season will be derived from the results from the Zone 5, MISO auction and the numbers will be input into Attachment C
- Once the results are known, the next step is to input the data into "Attachment C EO 2023 0136"
 - Input the PRA cleared prices in cells D18 (winter), E18 (spring), F18 (summer), G18 (fall)
 - Input the PRA cleared MWs in cells I23 (winter), J23 (spring), K23 (summer), L23 (fall)
 - The EO will be calculated and shown in cell S23.

¹ This link will not work unless the user has appropriate certifications on their machine, allowing them to access the appropriate areas of the MISO portal.

Attachment A
EO-2023-0136

Basic premise is to take the available EO in each year, and prorate it to the four MISO seasons based on the PRA cleared price in each season.

Annual target EO	\$ 1,885,500
EO rate	0.15
Seasonal MW Target	\$ 1,885,500

$$\text{EO rate by season} (\$/\text{cleared and verified PRA MW}) = \frac{\$ 1,885,500}{\text{Seasonal MW Target}} \times \frac{\text{cleared PRA price by season}}{\text{sum of cleared PRA prices for planning year}}$$

PRA	Winter	Spring	Summer	Fall
2023-2026	10	10	30	50

EO available by season (target)	Winter	Spring	Summer	Fall
	\$ 188,550	\$ 188,550	\$ 565,650	\$ 942,750
difference from annual target				

PRA	Winter	Spring	Summer	Fall
Example 1	\$ 1,885.50	\$ 1,885.50	\$ 3,142.50	\$ 9,427.50

PRA Cleared MW	Winter	Spring	Summer	Fall
	100	100	146.2	100

Calculation of EO	Winter	Spring	Summer	Fall	Potential EO	Actual EO
	\$ 188,550	\$ 188,550	\$ 459,424	\$ 942,750	\$ 1,779,274	\$ 1,779,274

- If non-performance occurs once, MISO charges a penalty. The originally cleared auction results continue to settle with no changes.
 - If non-performance occurs twice, a penalty is charged, and the Demand Response (DR) resource will no longer be eligible to receive Auction Clearing Price (ACP) payments for the remainder of the current Planning Year and for the next Planning Year.
 - Details are in the attached "BPM-011-r29_Resource_Adequacy 6.5.2 DR Performance" (Attachment D-2). This is a subset of the corresponding MISO Resource Adequacy Business Practice Manual (BPM), which can be found here: <https://www.misoenergy.org/legal/rules-manuals-and-agreements/business-practice-manuals/>.
- In the event MISO charges a penalty to AMO for non-performance related to demand response, the EO will be adjusted by the MW amount of non-performance.



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Appendix K – Resource Adequacy Timeline for activities for the Planning Year 2025-2026

Please check for the latest online version posted on the Resource Adequacy webpage of MISO's corporate website.

Date	Process and Notes	Responsible Entity	Tariff Reference
Sep 01, 2024	Start Cost of New Entry (CONE) calculation in coordination with IMM.	MISO/IMM	69A.8(a)(3)
Sep 09, 2024	MISO to publish historical monthly and seasonal Coincident Peak Load hours and LRZ seasonal coincident factors.	MISO	69A.1.1.(c)
Oct 01, 2024	Last day to submit outage exemption related resolution requests regarding Schedule 53 resources through the MISO Help Center.	Resource Owner	
Oct 01, 2024	MISO opens the new Planning Year in the MECT for all 4 Seasons. (1st Business Day - October)	MISO	
Oct 01, 2024	Transmission losses by Local Balancing Authority are posted by MISO. (1st Business Day - October)	MISO	69A.1.1(b)
Oct 15, 2024	MISO posts RA hours to be used for accreditation calculation	MISO	
Oct 31, 2024	Generation Verification Test Capacity (GVTC) due. Resource Owners submit operational data or real power test for September 1 - August 31 period.	Resource Owner	69A.3.1.a, b, & c, 69A.3.6
Oct 31, 2024	Populated Non-GADS Performance Templates due in MECT.	Resource Owner	69A.3.1.a(1)(d)
Oct 31, 2024	Generator availability data due in GADS for resources required to report for Q3. Resource Owners must ensure at least 36 months of data is provided.	Resource Owner	69A.3.1.a(1)(c)
Nov 01, 2024	Seasonal Coincident and Non-Coincident Peak Demand forecasts by LSE/EDC, monthly peak Demand, seasonal peak Demand and energy-for-load forecast values by LSE due. No action needed by Retail Choice LSEs.	LSE, EDC	69A.1.1(a)
Nov 01, 2024	Loss of Load Expectation study results published by MISO.	MISO	68A.2 68A.4 68A.5
Nov 07, 2024	MP must request an extension from within 5 business days after October 31 deadline.	Resource Owner	69A.3.1.a, b, & c, 69A.3.6



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Date	Process and Notes	Responsible Entity	Tariff Reference
Nov 15, 2024	Review list of units with conditional Interconnection Service for results of annual study. Units may have NRIS/ERIS balance re-allocated.	MISO	
Dec 01, 2024	For individual States establishing their own seasonal PRM, submission of written letter by authorized State regulatory authority representative notifying MISO.	State Regulatory Authority	68A.1
Dec 15, 2024	RBDC opt out adder % posted on MISO website	MISO	69A.9.1 (I)
Dec 15, 2024	Initial UCAP/ISAC ratio, initial Seasonal Capacity accreditation values and validation files are published by MISO. Resources that do not meet the October 31 deadline will have their initial capacity accreditation calculated using estimated capacity submitted along with GVTC extension requests. MP may begin submitting resolution requests through the MISO Help Center.	MISO	
Dec 15, 2024	PLC submissions by EDC due. EDC will send the details of the PLCs to the respective LSEs and to MISO for review. The EDC-provided PLC data will be the default value for the LSE's Retail Choice Coincident Peak.	Retail Choice EDCs	69A.1.1(e)
Dec 15, 2024	Last day for MPs to submit to March Network & Commercial Model changes to qualify for ICAP Deferral.	Resource Owner	
Jan 15, 2025	LSE submit initial RBDC Opt Out Plan in MECT, including its RERRA contact	LSE	69A.9.1 (c)
Jan 15, 2025	Generation Verification Test Capacity (GVTC) due for generators that requested an extension.	Resource Owner	69A.3.1.a, b, & c, 69A.3.6
Jan 15, 2025	LSEs confirm the seasonal Retail Choice PLC in the MECT. LSEs should have all PLC questions resolved by this date. If an LSE desires a change in their PLC value, the appropriate EDC should be contacted directly.	LSEs, Retail Choice EDC	69A.1.1.1
Jan 15, 2025	Evidence for seasonal HUC/ZDC hedges due.	LSE	69A.7.7(b)
Jan 20, 2025	MISO notifies RERRA its regulating LSE's initial plan for opting out RBDC	MISO	69A.9.1 (d)



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Date	Process and Notes	Responsible Entity	Tariff Reference
Jan 31, 2025	Default technology-specific avoidable costs posted by the IMM. Resource owners may use the default costs in lieu of submitting facility specific operating costs for a facility specific Reference Level request. (59 days prior to deadline for offers)	IMM	64.1.4(f)(ii)
Jan 31, 2025	Generator availability data due in GADS for resources required to report for Q4.	Resource Owner	69A.3.1.a, b, & c, 69A.3.6
Feb 01, 2025	Last day to submit non-exemption related resolution requests on ISAC posted for Schedule 53 resources through the MISO Help Center.	Resource Owner	
Feb 01, 2025	Existing Load Modifying Resource, Energy Efficiency, and External Resource registrations due for prompt Planning Year.	LMR/EE/ER Owner	
Feb 01, 2025	Loss of Load Expectation study begins for next Planning Year.	MISO	
Feb 01, 2025	Evidence of Demand Resource testing due. Last day to submit evidence. DR testing or performance must take place during the calendar year prior to the upcoming Planning Year.	DR Owner	69A.3.5
Feb 01, 2025	Written letter from officer of company stating intention to leverage DR testing deferral provisions due.	DR Owner	69A.3.5(l)
Feb 07, 2025	Last day to submit a Full Responsibility Transaction. (due the 5 th business day of February)	LSE	
Feb 14, 2025	If utilizing FSRL, last day to submit request to IMM regarding Going-Forward Cost determination. Submit data for facility ZRC reference levels to IMM. (45 days prior to close of PRA offer deadline)	Generation Owner	64.1.4.f.iii.b
Feb 15, 2025	Final UCAP/ISAC ratio and SAC values for Schedule 53 resources will be posted on MECT. Schedule 53 resource owners can start confirming SAC and converting SAC into ZRCs.	MISO	
Feb 15, 2025	New Load Modifying Resource, Energy Efficiency Resource, and External Resource registrations must be submitted for approval to be considered for inclusion in seasonal FRAP or RBDC Opt Out.	LSE	69A.9(a)
Feb 15, 2025	LSEs submit request to revise seasonal Coincident Peak Demand forecast originally submitted on November 1. MISO will review and either approve or deny request.	LSE	
Feb 15, 2025	Written letter from officer of company stating intention to leverage ICAP Deferral provisions.	Resource Owner	69A.7.9(a)



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Date	Process and Notes	Responsible Entity	Tariff Reference
Feb 17, 2025	Last day that RERRA notifies MISO if it denies any of the LSE's plan for opting out RBDC	RERRA	69A.9.1 (d)
Feb 28, 2025	Capacity accreditation updated for resources granted ICAP Deferral.	MISO	
Mar 01, 2025	Seasonal Generator Verification Test Capacity and generator availability data for new resources or resources with increased capacity due for prompt Planning Year.	Generation Owner	69A.3.1.a(d)
Mar 01, 2025	New Load Modifying Resource, Energy Efficiency Resource, and External Resource registrations must be submitted for approval in the MECT for the prompt Planning Year.	LMR/EE/ER Owner	69A.9(a)
Mar 01, 2025	Deadline to satisfy credit requirements for DRs opting out of or deferring testing. Credit posting only required if DR doesn't have regulatory restrictions or contractual obligations that preclude testing.	DR Owner	69A.3.5 (j)(2)&(l)
Mar 01, 2025	MISO to complete its seasonal Coincident Peak Demand forecast review process.	MISO	69A.1.1(c)
Mar 01, 2025	Satisfy credit posting requirement for seasonal capacity accreditation issued from resources granted ICAP Deferral.	Resource Owner	69A.7.9(b)
Mar 01, 2025	Resource Owners submit Attachment Y requests for units scheduled for retirement/suspension between 3/30 and 5/31 to receive exemption from physical withholding.	Resource Owner	38.2.7.a.(i)
Mar 03, 2025	Publish seasonal Sub Regional Import Constraint (SRIC) and seasonal Sub Regional Export Constraint (SREC) for each Sub Regional Resource Zone (SRRZ) no later than first business day in March.	MISO	68A.3.1
Mar 10, 2025	Finalize and submit HUC registrations in the MECT.	LSE	
Mar 11, 2025	Seasonal Fixed Resource Adequacy Plan due by LSE. (7th Business Day of March)	LSE	69A.9(a)
Mar 11, 2025	LSE confirms its RBDC Opt Out Plan in MECT (7th Business Day of March)	LSE	69A.9.1(c)
Mar 14, 2025	Last day to notify IMM of deliverable resources requesting to be excluded from offering into seasonal PRAs or included in a FRAP or RBDC Opt Out.	Generation Owner	
Mar 15, 2025	Fixed Resource Adequacy and RBDC Opt Out Plan review completed by MISO. The LSE will have until the auction offer window opens to remedy any deficiencies in their FRAP or RBDC Opt Out.	MISO(LSE)	69A.9(a) 69A.9.1(c)



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Date	Process and Notes	Responsible Entity	Tariff Reference
Mar 19, 2025	Final date to update seasonal CIL and CEL values for each LRZ prior to the Planning Resource Auction. Changes due to firm capacity commitments from MISO resources to neighboring regions established prior to the PRA.	MISO	68A.4
Mar 19, 2025	CEL determined for each ERZ. Equal to the ZRC quantity of the External Resources registered to participate in the PRA. (8th business day in March prior to the last business day)	MISO	68A.4
Mar 19, 2025	Final posting by MISO of preliminary seasonal PRA data, reflective of updated information from LSEs, Resource Owners and PJM auction results. Coincides with seasonal CIL/CEL calculations.	MISO	
Mar 27, 2025	Provide Facility Specific Resource Level(s) to MPs 5 days prior to the close of the PRA offer window.	IMM	64.1.4.f
Mar 25, 2025	Final day for confirming/converting SAC in MECT.	Resource Owner	
Mar 26, 2025	Planning Resource Auction offer window is opened for all Seasons. Auction Offer window is opened at 8:00 AM EPT, 3 business days prior to the last business day in March.	MISO	69A.7.1(a)
Mar 31, 2025	Planning Resource Auction offer window is closed for all Seasons. Auction Offer window is opened at 6:00 PM EPT on the last business day of March.	MISO	69A.7.1(a)
Apr 01, 2025	Iterations of seasonal auction runs with adjusted seasonal CILs and CELs may be required to ensure that a network loading is not violated. Additionally, MISO will work with the IMM to evaluate potential withholding. The reference levels are used to determine financial withholding. The mitigation of financial withholding can be expected to reduce the Auction Clearing Price. (First 20 Business Days of April)	MISO/IMM*	69A.7
Apr 28, 2025	Seasonal Planning Resource Auctions results posted. (20th Business Day of April)	MISO	69A.7
Apr 30, 2025	Generator availability data due in GADS for resources required to report for Q1.	Resource Owner	69A.3.1.a, b, & c, 69A.3.6
May 01, 2025	MISO to assess seasonal Capacity Deficiency Charges for applicable LSEs.	MISO	69A.10(a)
May 8, 2025	MISO sends Capacity Deficiency Charges to applicable LSEs 5 business days after assessment.	MISO	



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Date	Process and Notes	Responsible Entity	Tariff Reference
May 19, 2025	Capacity Deficiency Charge payments distributed to MPs. Payment made within 7 business days of receipt.	MISO	
May 28, 2025	Publish details of the seasonal ZRC offers submitted in the PRA. Market Participant IDs are not revealed. (One month after PRA)	MISO	69A.7.4
May 28, 2025	MISO publishes cleared LMRs to DSRI. MISO publishes must offer performance requirements in the applicable Operations tool.	MISO	
May 30, 2025	Information due to satisfy ICAP Deferral must be submitted to MISO to avoid ICAP Deferral Non-Compliance Charge for Summer Season. (Last business day of Planning Year)	LSE	69A.7.9(a) (2)
May 30, 2025	Information due to satisfy DR Deferral Notice must be submitted to MISO in order to release credit requirements and avoid LMP performance penalties.	DR Owner	69A.3.5
Jun 01, 2025	Summer Season in new Planning Year starts.	All	69A.7
Jun 01, 2025	Daily settlements for the Summer Season starts.	All	
July 31, 2025	Generator availability data due in GADS for resources required to report for Q2.	Resource Owner	69A.3.1.a, b, & c, 69A.3.6
August 29, 2025	Information due to satisfy ICAP Deferral must be submitted to MISO to avoid ICAP Deferral Non-Compliance Charge for Fall Season. (Last business day)	LSE	69A.7.9(a) (2)
Sep 01, 2025	Fall Season in new Planning Year starts.	All	69A.7
Sep 01, 2025	Daily settlements for the Fall Season starts.	All	
November 26, 2025	Information due to satisfy ICAP Deferral must be submitted to MISO to avoid ICAP Deferral Non-Compliance Charge for Winter Season. (Last business day)	LSE	69A.7.9(a) (2)
Dec 01, 2025	Winter Season in new Planning Year starts.	All	69A.7
Dec 01, 2025	Daily settlements for the Winter starts.	All	
February 27, 2026	Information due to satisfy ICAP Deferral must be submitted to MISO to avoid ICAP Deferral Non-Compliance Charge for Spring Season. (Last business day)	LSE	69A.7.9(a) (2)



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Date	Process and Notes	Responsible Entity	Tariff Reference
Mar 01, 2026	Spring Season in new Planning Year starts.	All	69A.7
Mar 01, 2026	Daily settlements for the Spring Season starts.	All	

6.5.2 DR Performance

If a DR that either is used in a seasonal FRAP or cleared in the seasonal PRA fails to perform during an Emergency when included in a Market Participant's Resource Deployment response to Scheduling Instructions, penalties will be calculated for each hour in which a DR fails to respond in an amount greater than or equal to the target level of Load reduction entered in the Resource Deployment screen of the LMR Scheduling Instruction Event in the DSRI as the sum of: (1) the product of (a) the amount of load reduction not achieved, including Load above the registered firm service level for those DR registered as such and (b) the LMP at the CPNode associated with the DR; and (2) applicable RSG Charges. The amount of Load reduction not achieved for DRs is equal to the greater of: (1) the difference between (a) the target level of Load reduction and (b) actual Load reduction; and (2) zero. The RSG Charges are equal to the product of: (1) the difference between (a) the target level of Load reduction and (b) actual Load reduction; and (2) the applicable RSG charges.

If advanced reporting is not entered in response to Scheduling Instructions into the Resource Deployment screen of the LMR Scheduling Instruction Event in the DSRI, then the full amount of Scheduling Instructions will be penalized.

Unless already entered as Self-Scheduled for the event, DRs registered with a firm service level must still show a load reduction. Advanced Reporting should reflect the best estimate of load reduction available (i.e. load above the firm service level) during the event. Penalties will still be measured as load above the registered firm service level.

The revenues from charges resulting from DRs that fail to respond in an amount greater than or equal to the MP responses to Scheduling Instructions shall be allocated, *pro rata*, to MPs representing LSEs in the LBA area(s) that experienced the Emergency, on a load ratio share basis.

For any situation where a DR does not respond in an amount greater than or equal to the target level of Load reduction or registered firm service level or the resource is unavailable, including those circumstances where the resource is unavailable for maintenance reasons or Force Majeure, MISO shall initiate an investigation into the cause of the DR not being available when called upon, and may, if deemed appropriate, disqualify that resource from ACP payments for that Planning Year. The DR may be called but not required to respond if the Emergency call is outside the resource's registration limitations (i.e. less than the registered time to respond, the event lasts longer than the registered duration, is made outside the DR's registered availability period; or the resource has reached its registered maximum number of deployments for that Season). However, should a Demand Resource indicate availability in the DSRI at any time in a Season within the Planning Year, it is considered available in the event of an Emergency during that Season and may receive scheduling instructions.

In the event the same DR is not sufficiently responsive, including being unavailable, on a second occasion during a Season within the Planning Year (with a separation period of at least 24 hours) when included in a Market Participant's response to Scheduling Instructions; except when unavailable due to maintenance reasons, Force Majeure or other acceptable reasons as outlined in the Tariff or this BPM, the MP that registered the DR that was used to meet Resource Adequacy Requirements will be subject to the penalties described herein. The MP using the DR shall be

assessed the same penalty as indicated above for a first performance failure, and the DR will no longer be eligible to receive ACP payments for the remainder of the current Planning Year and for the next Planning Year (s).

If, in review of the DR's measurement and verification data following an Emergency, MISO determines that the MP has committed fraud to receive excess payments or avoid penalties, MISO will have the right to ban the MP or its customers from participation in the wholesale electricity markets, as well as, pursue other legal options at the sole discretion of MISO.

Confidential Designation
20 CSR 4240-2.135 (2)

(A) Any person may submit to the commission, without first obtaining a protective order, information designated as confidential if that information is—

- 1. Customer-specific information;
- 2. Employee-sensitive personnel information;
- 3. Marketing analysis or other market-specific information relating to services offered in competition with others;
- 4. Marketing analysis or other market-specific information relating to goods or services purchased or acquired for use by a company in providing services to customers;
- 5. Reports, work papers, or other documentation related to work produced by internal or external auditors, consultants, or attorneys, except that total amounts billed by each external auditor, consultant, or attorney for services related to general rate proceedings shall always be public;
- 6. Strategies employed, to be employed, or under consideration in contract negotiations;
- 7. Relating to the security of a company's facilities; or
- 8. Concerning trade secrets, as defined in section 417.453, RSMo.

STATE OF MISSOURI

OFFICE OF THE PUBLIC SERVICE COMMISSION

I have compared the preceding copy with the original on file in this office and I do hereby certify the same to be a true copy therefrom and the whole thereof.

WITNESS my hand and seal of the Public Service Commission, at Jefferson City, Missouri, this 14th day of November 2024.



Nancy Dippell

Nancy Dippell
Secretary

MISSOURI PUBLIC SERVICE COMMISSION

November 14, 2024

File/Case No. EO-2023-0136

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Enclosed find a certified copy of an Order or Notice issued in the above-referenced matter(s).

Sincerely,

A handwritten signature in black ink that reads "Nancy Dippell". The signature is written in a cursive, flowing style.

**Nancy Dippell
Secretary**

Recipients listed above with a valid e-mail address will receive electronic service. Recipients without a valid e-mail address will receive paper service.