

**BEFORE THE PUBLIC SERVICE COMMISSION  
OF THE STATE OF MISSOURI**

|  |   |                       |
|--|---|-----------------------|
| In the Matter of Union Electric                | ) |                       |
| Company d/b/a Ameren Missouri's                | ) |                       |
| 3 <sup>rd</sup> Filing to Implement Regulatory | ) | File No. EO-2023-0136 |
| Changes in Furtherance of Energy               | ) |                       |
| Efficiency as Allowed by MEEIA.                | ) |                       |

**REQUEST TO APPROVE**  
**TECHNICAL RESOURCE MANUAL AND DEEMED SAVINGS TABLE**  
**AND MOTION FOR EXPEDITED TREATMENT**

COMES NOW Union Electric Company d/b/a Ameren Missouri (“Ameren Missouri” or “Company”) and submits this *Request to Approve Technical Resource Manual and Deemed Savings Table and Motion for Expedited Treatment* (“Request”) to the Missouri Public Service Commission (“Commission”) for approval. In support thereof, the Company respectfully states as follows:

1. On October 31, 2024, Ameren Missouri and certain other parties to this proceeding submitted a *Stipulation and Agreement* (“Agreement”) to the Commission for approval. The Commission issued its *Order Approving Non-Unanimous Stipulation and Agreement and Granting Waivers* on November 14, 2024. That *Agreement* included the submission of a revised *Ameren Missouri 2025-27 MEEIA Energy Efficiency Plan* (“Report”).
2. The Technical Resource Manual (“TRM”) serves as the source for measure savings formulas and default inputs to use in the absence of utility-specific evaluation results. The TRM, and certain updates thereto, are also used to calculate throughput disincentive on a prospective basis, subject to DSIM true-up provisions.<sup>1</sup> The Deemed Savings Table represents the application of the formulas in the TRM for discrete measures that are being offered, and also reflect the inputs

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<sup>1</sup> “Demand-side Investment Mechanism.”

into those formulas based on utility-specific evaluation results. Accordingly, revisions to the TRM can necessitate revisions to the Deemed Savings Table.

3. Under the *Agreement*, the Company removed measures in the TRM that are no longer offered nor planning to be offered in 2025, including removing the thermostat energy savings. The TRM included with this filing provides page and cell citation to sources and the incentive range schedule included with this filing is aligned with the available measures in the TRM.

Ameren Missouri's 2025-27 Energy Efficiency Plan anticipates a dynamic TRM with annual updates responsive to evaluation, measurement, and verification (“EM&V”) results. Ameren Missouri previously requested revisions to the TRM and Deemed Savings tables, and the Commission approved the same, on seven prior occasions in File No. EO-2018-0211:

| <b>Table 1 – Prior TRM and Deemed Savings Table Updates</b> |                                    |
|---|------------------------------------|
| <b>Date Revisions Requested</b>                             | <b>Data Approved by Commission</b> |
| December 31, 2018   | February 27, 2019                  |
| November 15, 2019   | December 11, 2019                  |
| June 19, 2020   | July 8, 2020                       |
| October 16, 2020 <sup>2</sup>                               | November 12, 2020                  |
| September 15, 2021  | September 29, 2021                 |
| September 27, 2022  | October 12, 2022                   |
| October 5, 2023   | October 25, 2023                   |

4. It is important that the TRM always reflects current information available based on final program evaluations and current program implementation objectives. Consistent with prior filings, Ameren Missouri has identified several revisions to the TRM and the Deemed Savings Tables that are appropriate for the program year beginning 2025. The primary focus of this TRM

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<sup>2</sup> A correction to the filing was made on October 29, 2020.

update is address Staff concerns regarding source documentation and removing measures that are no longer offered nor planning to be offered in 2025, along with the inclusion of the final evaluated results from the 2023 program year.

Ameren Missouri provided these proposed revisions to Commission Staff in September, but Commission Staff has not had an opportunity to provide comments to Ameren Missouri prior to the filing. Additionally, the implementation team and the evaluators aided in gathering the data and documents used by the Company and have been provided with these resulting updates. The measure changes have undergone a cost effectiveness analysis and will not require any adjustment of the portfolio's goals.

5. Ameren Missouri therefore offers a revised TRM and Deemed Savings Table for the Commission's approval. The revisions are found and explained in the attachments referenced in the following Table 2:

| <b>Table 2</b>  |  |
|---|--|
| <b>List of Attachments Encompassing Revisions to TRM and Deemed Savings Table</b> |  |
| <b>Name</b>   | <b>Description</b>   |
| Appendix F – Deemed Savings Table   | Clean copy of revised Deemed Savings Table in PDF format   |
| Appendix F - Deemed Savings Table_Clean   | Clean copy of revised Deemed Savings Table in executable Excel format                                |
| Appendix F - Deemed Savings Table_Redline   | Redlined copy of Deemed Savings Table in Excel format  |
| Appendix H – TRM-Vol 2_Bus_Clean  | Clean copy of revised Appendix H – TRM Volume 2 - Business   |
| Appendix H – TRM-Vol 2_Bus_Redline  | Redlined version of revised Appendix H - TRM Volume 2 – Business to illustrate location of revisions |

| <b>Table 2</b>  |   |
|---|---|
| <b>List of Attachments Encompassing Revisions to TRM and Deemed Savings Table</b> |   |
| <b>Name</b>   | <b>Description</b>  |
| Appendix I – TRM-Vol 3_Res_Clean  | Clean copy of revised Appendix I – TRM Volume 3 - Residential   |
| Appendix I – TRM-Vol 3_Res_Redline  | Redlined version of revised Appendix I - TRM Volume 3 – Residential to illustrate location of revisions |

6. Finally, Ameren Missouri requests expedited treatment of this *Request*. Ameren Missouri filed this petition as soon as it could be filed and within the 30-days required under the *Agreement*. The request is being filed in compliance with the *Agreement* and earlier than the requested implementation date of January 1, 2025. The Company requests approval on or about December 15, 2024, so that these revisions can go into effect with the next applicable program year beginning January 1, 2025. This time is necessary to update relevant data tracking and reporting systems prior to the January 1, 2025, program year. The January 1, 2025, effective date is necessary to align program tracking data and program evaluation data and ensures that prospective throughput disincentive funds are collected using the most current and accurate savings estimate.

**WHEREFORE**, Ameren Missouri requests the Commission issue an order approving the proposed revisions to the TRM (Appendix H and Appendix I) and Deemed Savings Table (Appendix F) in an expedited manner so that the revised TRM provisions may go into effect on January 1, 2025.

Respectfully submitted,

*/s/ Jennifer S. Moore*

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**d/b/a Ameren Missouri**

**CERTIFICATE OF SERVICE**

I do hereby certify that a true and correct copy of the foregoing document has been hand-delivered, transmitted by e-mail, or mailed, First Class, postage prepaid, this 27<sup>th</sup> day of November 2024, to counsel for all parties on the Commission's service list in this case.

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