

**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.)

STAFF RECOMMENDATION

COMES NOW the Staff of the Missouri Public Service Commission (“Staff”), by and through the undersigned counsel, and for its *Staff Recommendation* respectfully states as follows:

1. Union Electric Company d/b/a Ameren Missouri (“Ameren Missouri”), the Office of the Public Counsel (“OPC”), Renew Missouri Advocates d/b/a Renew Missouri (“Renew Missouri”), and Consumers Council (collectively “Signatories”) filed a *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* (“Stipulation”) on October 30, 2024. Staff was not a signatory to this Stipulation. Staff filed its response to the Stipulation on November 6, 2024, indicating that, while Staff had concerns with the Stipulation, Staff did not oppose.

2. With regard to the Technical Resource Manual (“TRM”), the load shapes included in the TRM, the Deemed Savings Table (“DST”), the Incentive Ranges, and Program Templates for which Ameren Missouri has requested approval, these materials all include measures which were not approved by the Commission. The Stipulation states the following regarding the removal of measures from the TRM:

Ameren Missouri will remove measures from the TRM (**any measures that are not included in the modeling for the programs above at a minimum**) (including removal of thermostat energy savings) (emphasis added)¹

The Stipulation further states that “the incentive range schedule will be aligned with available measures from the TRM.”²

3. The issuance of discovery and time for necessary analysis of these materials would cause a significant gap in MEEIA program availability. Furthermore, it is Staff’s understanding that no non-utility party has had an opportunity to review the accuracy or reasonableness of the assumptions contained therein.

4. To avoid a gap in program availability, Staff suggests that the Commission order limited approval to only those measures in those programs which were approved by the Commission. Staff has compiled a list of these measures by program in Staff’s Appendix A. Staff also suggests the Commission order updated filings to be made by Ameren Missouri to limit the TRM (including load shapes), DST, Incentive Ranges and Program Templates to only those approved by the Commission and listed in Staff’s Appendix A, attached and incorporated herein.

5. With regard to the tariffs, while not opposing the Stipulation, Staff did indicate continued concerns. Staff was able to work with the parties during negotiations, and appreciates the work all parties put into the settlement and discussions since, but Staff’s concerns³ were not all addressed within the Stipulation. As noted in Staff’s direct case and the *Staff Response to Non-Unanimous Stipulation and Agreement*,

¹ *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*, pg. 11, para. 11.

² *Id.*

³ Concerns laid out in *Staff Response to Non-Unanimous Stipulation and Agreement* at paragraph 3, sub-paragraphs a-i.

the tariffs lacked the level of detail and specificity that Staff believes are necessary for a MEEIA portfolio. Further, Staff is independently of the opinion that the tariff sheets may not be compliant with the Stipulation because they include references to supporting documents that include programs and measures that were not approved nor included in the Stipulation.

6. Tariff sheet 180 has been revised by Ameren Missouri to state, “1. The Standard Program design is comprised of measures that result in a total program TRC ratio greater than 1.0.” This language previously stated, “Measures must be part of a Project having an installed TRC ratio greater than 1.0.” Staff recommends that Ameren Missouri expeditiously file a substitute tariff to return this language to its previous wording, or remove the language entirely to the extent that measures with a TRC of less than 1.0 are not available under the terms of the Stipulation.

7. Staff has performed a limited review of the tariffs and determined that, if the substitute indicated above is made, the tariffs facially comply with the requirements of the Stipulation and recommends the tariffs be allowed to go into effect by operation of law so long as the approval is limited to only those programs modeled in Staff’s Appendix A.

WHEREFORE Staff respectfully submits this *Staff Recommendation* for the Commission’s information and consideration, and to grant such other and further relief as the Commission considers just and reasonable under the circumstances.

Respectfully submitted,

/s/ Travis J. Pringle

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Attorneys for the Staff of

The Missouri Public Service Commission

CERTIFICATE OF SERVICE

I hereby certify that copies of the foregoing have been mailed, hand-delivered, or transmitted by facsimile or electronic mail to all parties and/or counsel of record this 6th day of December 2024.

/s/ Travis J. Pringle

PAYS:

Air Sealing (Infiltration reduction) - 30% SF IE DI Gas furnace base
Air Sealing (Infiltration reduction) - 30% SF IE DI heat pump base
Air Sealing (Infiltration reduction) - 30% SF IE DI electric furnace base
LED - 10W (CFL baseline) (750-1049 lumens)
Learning Thermostat - ASHP heating/cooling SF
Learning Thermostat - Gas Heated / central AC SF**
Low Flow Bathroom Faucet Aerator SFIE DI
Low Flow Kitchen Faucet Aerator SFIE DI
Low Flow Showerhead SFIE DI
Pipe Insulation SFIE DI
Advanced Tier 1 Power Strips / DI - Unknown Location
CAC-SEER16_ER1_SF
CAC-SEER16_ER2_SF
CAC-SEER16_ER1_SF
CAC-SEER16_ER2_SF
ASHP-SEER16-Replace_CAC_ElectricHeat_ER1_SF
ASHP-SEER16-Replace_CAC_ElectricHeat_ER1_SF
ASHP-SEER16-Replace_CAC_ElectricHeat_ER2_SF
ASHP-SEER16-Replace_CAC_ElectricHeat_ER2_SF
ASHP-SEER16-Replace_CAC_ElectricHeat_ER1_SF
ASHP-SEER16-Replace_CAC_ElectricHeat_ER1_SF
ASHP-SEER16-Replace_CAC_ElectricHeat_ER2_SF
ASHP-SEER16-Replace_CAC_ElectricHeat_ER2_SF
ASHP-SEER16-Replace_CAC_ElectricHeat_ER2_SF
ASHP-SEER16-Replace_CAC_ElectricHeat_ER1_SF
ASHP-SEER16-Replace_CAC_ElectricHeat_ER1_SF
ASHP-SEER16-Replace_CAC_ElectricHeat_ER2_SF
ASHP-SEER16-Replace_CAC_ElectricHeat_ER2_SF
ASHP-SEER16-Replace_CAC_ElectricHeat_ER2_SF
ASHP-SEER16-Replace_CAC_ElectricHeat_ER1_SF
ASHP-SEER16-Replace_CAC_ElectricHeat_ER1_SF
ASHP-SEER16-Replace_CAC_ElectricHeat_ER2_SF
ASHP-SEER16-Replace_CAC_ElectricHeat_ER2_SF
ASHP-SEER16-Replace_CAC_ElectricHeat_ER1_SF
ASHP-SEER16-Replace_CAC_ElectricHeat_ER1_SF
ASHP-SEER16-Replace_CAC_ElectricHeat_ER2_SF
ASHP-SEER16-Replace_CAC_ElectricHeat_ER2_SF
Learning Thermostat - ASHP heating/cooling SF
Learning Thermostat - ASHP heating/cooling SF

Learning Thermostat - electric furnace heating / central AC SF
Learning Thermostat - electric furnace heating / central AC SF
Learning Thermostat - Gas Heated / central AC SF**
Learning Thermostat - Gas Heated / central AC SF**
Learning Thermostat - Unknown SF**
Learning Thermostat - Unknown SF**
Duct Repair (Sealing) - Gas Heating SF
Duct Repair (Sealing) - Electric Heating SF
Ceiling Insulation R5-R38 SF IE DI gas heat electric cool base
Ceiling Insulation R5-R38 SF IE DI heat pump base
Ceiling Insulation R5-R38 SF IE DI electric furnace base
Custom Lighting LED
CAC-SEER16_ER1_SF
CAC-SEER16_ER2_SF
ASHP-SEER16-Replace_CAC_ElectricHeat_ER1_SF
ASHP-SEER16-Replace_CAC_ElectricHeat_ER1_SF
ASHP-SEER16-Replace_CAC_ElectricHeat_ER2_SF
ASHP-SEER16-Replace_CAC_ElectricHeat_ER2_SF
ASHP-SEER16-Replace_CAC_ElectricHeat_ER1_SF
ASHP-SEER16-Replace_CAC_ElectricHeat_ER1_SF
ASHP-SEER16-Replace_CAC_ElectricHeat_ER2_SF
ASHP-SEER16-Replace_CAC_ElectricHeat_ER2_SF
ASHP-SEER16-Replace_CAC_ElectricHeat_ER1_SF
ASHP-SEER16-Replace_CAC_ElectricHeat_ER1_SF
ASHP-SEER16-Replace_CAC_ElectricHeat_ER2_SF
ASHP-SEER16-Replace_CAC_ElectricHeat_ER2_SF

Multi-Family Income Eligible:

Heat Pump Hot Water Heater
Learning Thermostat - electric furnace heating / central AC MF
Learning Thermostat - electric furnace heating / central AC MF
Learning Thermostat - Gas Heated / central AC MF**
Learning Thermostat - Gas Heated / central AC MF**
Advanced Tier 2 Power Strips / TOS/NC / Average
Dirty Filter Alarm_MF
CAC-SEER16_ER1_MF
CAC-SEER16_ER1_MF
Mini/MultiSplitAC_ER1_MF_CompE
Mini/MultiSplitAC_ER1_MF_CompE
ASHP-SEER16-Replace_CAC_ElectricHeat_ER1_MF_CompE
ASHP-SEER16-Replace_CAC_ElectricHeat_ER1_MF_CompE
ASHP-SEER16-Replace_CAC_ElectricHeat_ER1_MF_CompE
ASHP-SEER16-Replace_CAC_ElectricHeat_ER1_MF_CompE
ASHP-SEER21-Replace_CAC_ElectricHeat_ER1_MF
ASHP-SEER21-Replace_CAC_ElectricHeat_ER1_MF
ASHP-SEER21-Replace_CAC_ElectricHeat_ER1_MF
ASHP-SEER21-Replace_CAC_ElectricHeat_ER1_MF
AC Tune-up / Packaged Service MF
HP tune-up / Packaged Service MF
MH Adjusted Air Sealing (Infiltration reduction) - 30% SF IE DI gas furnace base
Ceiling Insulation R5-R49 MF IE DI gas heat electric cool base
Duct Repair (Sealing) - Electric Heating MF Adjusted
Duct Repair (Sealing) - Gas Heating MF Adjusted
Low Flow Bathroom Faucet Aerator MFIE DI
Low Flow Kitchen Faucet Aerator MFIE DI
Low Flow Showerhead MFIE DI
Pipe Insulation MFIE DI
LED - 4W Candelabra (CFL baseline) IEDI
LED - 10W (CFL baseline) (750-1049 lumens) IEDI
LED - 12W Dimmable Light Bulb (Replacing CFL) IEDI
Refrigerator - early replacement ER1
Refrigerator - early replacement ER1
LED <=11 Watt Lamp Replacing Interior Halogen A 28-52 Watt Lamp
LED 7-20 Watt Lamp Replacing Interior Halogen 53-70 Watt Lamp
LED Replacing Interior T8 Fluorescent (Type B, Kits, and Fixtures)
LED Specialty Lamp
Pool Heater Heat Pump (Covered)

Single-Family Income Eligible:

Learning Thermostat - ASHP heating/cooling SF
Learning Thermostat - ASHP heating/cooling SF
Learning Thermostat - electric furnace heating / central AC SF
Learning Thermostat - electric furnace heating / central AC SF
Learning Thermostat - Gas Heated / central AC SF**
Learning Thermostat - Gas Heated / central AC SF**
Advanced Tier 2 Power Strips / DI / Average
CAC-SEER16_ER1_SF
CAC-SEER16_ER2_SF
ASHP-SEER16-Replace_CAC_ElectricHeat_ER1_SF
ASHP-SEER16-Replace_CAC_ElectricHeat_ER1_SF
ASHP-SEER16-Replace_CAC_ElectricHeat_ER2_SF
ASHP-SEER16-Replace_CAC_ElectricHeat_ER2_SF
AC Tune-up / Refrigerant charge SF
AC Tune-up / Packaged Service SF
Air Sealing (Infiltration reduction) - 30% SF IE DI Gas furnace base
Ceiling Insulation R11-R49 SF IE DI gas heat electric cool base
Dirty Filter Alarm_MFIE
Duct Repair (Sealing) - Electric Heating SF
Duct Repair (Sealing) - Gas Heating SF
Duct Repair (Sealing) - Electric Heating MH Adjusted
Low Flow Bathroom Faucet Aerator SFIE DI
Low Flow Kitchen Faucet Aerator SFIE DI
Low Flow Showerhead SFIE DI
Pipe Insulation SFIE DI
Setback thermostat - full setback - ASHP heating/cooling SF
Setback thermostat - full setback - ASHP heating/cooling SF
Setback thermostat - full setback - elec furnace heating / central AC SF
Setback thermostat - full setback - elec furnace heating / central AC SF
Setback thermostat for SF - full setback - gas heating / central AC
LED - 4W Candelabra (CFL baseline) IEDI
LED - 8W Globe Light G25 Bulb (Replacing CFL) IEDI
LED - 10W (CFL baseline) (750-1049 lumens) IEDI
LED - 12W (Replacing CFL) IEDI
LED - 15W (CFL baseline) (1050-1489 lumens) IEDI
LED - 15W Flood Light PAR30 Bulb (CFL baseline) IEDI
LED - 18W Flood Light PAR38 Bulb (CFL baseline) IEDI
LED - 20W (CFL baseline) (1490-2600 lumens) IEDI
Advanced Tier 2 Power Strips / DI / Average
Refrigerator - early replacement ER1
Refrigerator - early replacement_ER2

AC - Energy Star Room _unknown size_SF
AC - Energy Star Room_12kBtu_SF
ECM Auto Fan Early Replacement ER1 (Full Cost) - SF
Carbon Monoxide Detectors
Smoke Detector
Low Flow Showerhead - Handheld Chrome - SFLI DI
Refrigerator - 21+ cuft - Energy Star Tier 1 - Top Freezer - ER1
Refrigerator - 21+ cuft - Energy Star Tier 1 - Top Freezer_ER2
Refrigerator - Energy Star Tier 1 - Side x Side - ER1
Refrigerator - Energy Star Tier 1 - Side x Side_ER2
Combo A CAC ER1 SEER 16 - 40-85MBH
Combo A CAC_ER2 SEER 16 - 40-85MBH
Combo B CAC ER1 SEER 16 - >85MBH
Combo B CAC_ER2 SEER 16 - >85MBH
ECM Auto Fan Early Replacement ER1 (Full Cost) - SF
AC - Energy Star Room_12000+ BTU_SF
ASHP-SEER16-Replace_CAC_ElectricHeat_ER1_SF
ASHP-SEER16-Replace_CAC_ElectricHeat_ER1_SF
ASHP-SEER16-Replace_CAC_ElectricHeat_ER2_SF
ASHP-SEER16-Replace_CAC_ElectricHeat_ER2_SF
CAC-SEER16_ER1_SF
CAC-SEER16_ER2_SF
ECM Auto Fan Early Replacement ER1 (Full Cost) - SF
Ice Maker Kit
Smoke Detector
LED - 10W (CFL baseline) (750-1049 lumens) IEDI
LED - 15W (CFL baseline) (1050-1489 lumens) IEDI
Learning Thermostat - electric furnace heating / central AC SF
Learning Thermostat - electric furnace heating / central AC SF
Learning Thermostat - Gas Heated / central AC SF**
Learning Thermostat - Gas Heated / central AC SF**
Low Flow Bathroom Faucet Aerator SFIE DI
Refrigerator - early replacement ER1
Refrigerator - early replacement_ER2
Refrigerator - 21+ cuft - Energy Star Tier 1 - Top Freezer - ER1
Refrigerator - 21+ cuft - Energy Star Tier 1 - Top Freezer_ER2
Refrigerator - Energy Star Tier 1 - Side x Side - ER1
Refrigerator - Energy Star Tier 1 - Side x Side_ER2
Setback thermostat - full setback - elec furnace heating / central AC SF
Setback thermostat - full setback - elec furnace heating / central AC SF
Setback thermostat for SF - full setback - gas heating / central AC
AC - Energy Star Room _unknown size_SF
LED Nightlights

Kit Faucet Aerator (Kitchen) - SFIE Kits
Low Flow Showerheads - SFIE Kits
Advanced Tier 1 Power / Kits - Unknown Location
LED - 10.5W Downlight E26 (CFL baseline)
LED - 10W (CFL baseline) (750-1049 lumens)
LED - 15W (CFL baseline) (1050-1489 lumens)
LED - 20W (CFL baseline) (1490-2600 lumens)
LED - 4W Candelabra (CFL baseline)
LED - 10W (CFL baseline) (750-1049 lumens)
LED Nightlights

Business Social Services:

LED <=80 Watt Lamp or Fixture Replacing Interior HID 100-175 Watt Lamp or Fixture
LED or Electroluminescent Replacing Interior Incandescent/CFL Exit Sign
LED Replacing Interior T5 Fluorescent (Type B, Kits, and Fixtures)
LED Replacing Interior T8 Fluorescent (Type B, Kits, and Fixtures)
LED Replacing Interior T12 Fluorescent (Type B, Kits, and Fixtures)
Fixture Mounted Occupancy Sensor Controlling > 60 Watts
Remote Mounted Occupancy Sensor Controlling > 150 Watts
Learning Thermostat
Single Packag or Split Sytem Unitary AC_DX <65kbtu

Business-Custom:

Custom-Air Comp
Custom-Building Shell
Custom-Cooking
Custom-Cooling
Custom-HVAC
Custom-Miscellaneous
Custom-Motors
Custom-Process
Custom-Refrigeration
Custom-Water Heating

Business-Standard:

0 < V < 15 - Vertical Closed - Solid Door Refrigerator
Horizontal Closed - Solid or Glass Door Refrigerator - All Volumes
15 ≤ V < 30 - Vertical Closed - Solid Door Freezer
0 < V < 15 - Vertical Closed - Glass Door Freezer
Anti-Sweat Heater Controls Refrigerator
Anti-Sweat Heater Controls Freezer
Pool Pump w/ Variable Frequency Drive
Learning Thermostat
VFD on Chilled Water Pump ≥ 1HP
VFD on Hot Water Pump ≥ 1HP
VFD on Condenser Water Pump ≥ 1HP
VFD on Cooling Tower Fan ≥ 1HP
VFD on HVAC Fans ≥ 1HP
Single Packag or Split Sytem Unitary AC_DX 135 - 240kbtu
Single Packag or Split Sytem Unitary AC_DX 240 - 760kbtu
Single Packag or Split Sytem Unitary AC_DX 65 -135kbtu
Single Packag or Split Sytem Unitary AC_DX >760kbtu
Single Packag or Split Sytem Unitary AC_DX <65kbtu
Air Cooled Chiller
Water Cooled Chiller
VSD Air Compressor 5-40 HP
Demand Controlled Ventillation (Gas Heat)
Demand Controlled Ventillation (Electric Heat)
Demand Controlled Ventillation (Heat Pump)
Advanced RTU Controls
High Volume Low Speed Fan, 20
High Volume Low Speed Fan, 22
High Volume Low Speed Fan, 24

Retro-Commissioning:

- RCx-Air Comp
- RCx-Cooling
- RCx-HVAC
- RCx-Refrigeration

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Regulatory Changes in Furtherance of Energy)
Efficiency as Allowed by MEEIA)

AFFIDAVIT OF MARK KIESLING

STATE OF MISSOURI)
) ss.
COUNTY OF COLE)

COMES NOW MARK KIESLING, and on his oath declares that he is of sound mind and lawful age; that he contributed to the foregoing *Staff Recommendation*; and that the same is true and correct according to his best knowledge and belief.

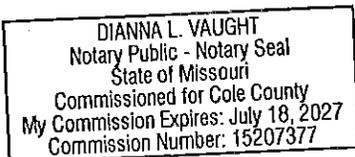
Further the Affiant sayeth not.

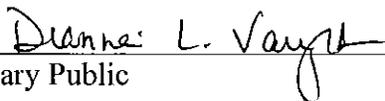


MARK KIESLING

JURAT

Subscribed and sworn before me, a duly constituted and authorized Notary Public, in and for the County of Cole, State of Missouri, at my office in Jefferson City, on this 6th day of December 2024.





Notary Public