

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

In the Matter of Union Electric Company)	
d/b/a Ameren Missouri's Electric Tariffs)	File No. ER-2025-0168
Adjustment Relating to MEEIA EEIC Rider)	Tracking No. JE-2025-0080

STAFF RECOMMENDATION

COMES NOW the Staff of the Missouri Public Service Commission ("Staff") and for its *Recommendation* in this matter states as follows:

1. On November 27, 2024, Union Electric Company d/b/a Ameren Missouri ("Ameren Missouri") filed a tariff sheet, with supporting testimony, to adjust the rate of its Missouri Energy Efficiency Investment Act ("MEEIA") Energy Efficiency Investment Charge ("EEIC"). The tariff sheet bears an issue date of November 27, 2024, and an effective date of February 1, 2025.

2. Commission Rule 20 CSR 4240-20.094(4) addresses Applications for Approval of Electric Utility Demand-Side Programs or Portfolios. This rule allows an electric utility to file an application with the Missouri Public Service Commission ("Commission") for approval of a demand-side portfolio pursuant to the provisions of this rule, Commission Rule 20 CSR 4240-2.060, and Section 393.1075, RSMo. Commission Rule 20 CSR 4240-20.093(4) allows electric utilities to adjust DSIM rates between general rate proceedings. Additionally, Commission Rule 20 CSR 4240-20.093(4)(B) requires that any demand-side investment mechanism filing is to either take effect by operation of law within sixty (60) days of the filing or should be ordered by the Commission in an interim rate adjustment to take effect in sixty (60) days. Lastly, Commission Rule 20 CSR 4240-20.093(4)(D) requires the electric utility to be in compliance with the quarterly and annual reporting requirements found in 20 CSR 4240-20.093(9) and (10) to increase DSIM rates.

3. Staff conducted a full review of the tariff revisions and accompanying testimony. The total proposed Rider EEIC rates reflect any remaining MEEIA 2016-18 Energy Efficiency Investment Rate (“EEIR”) Components (MEEIA Cycle 2), MEEIA 2019-21 EEIR Components (MEEIA Cycle 3), and the most recently effective MEEIA 2022-2024 EEIR Components (MEEIA Cycle 3 extensions). Additionally, the total Rider EEIC rates also include a small portion of forecasted program costs and throughput disincentive for the MEEIA Cycle 4 programs approved in EO-2023-0136. The MEEIA Cycle 1 programs ended on December 31, 2015, and have been fully recovered. Staff’s Memorandum, attached and incorporated herein as Attachment A, provides information regarding rate class impacts of the tariff changes.

4. Staff recommends the tariff sheet be found in compliance with the Commission’s Rules and the terms of the Rider EEIC.

5. Staff has verified that Ameren Missouri has filed its Annual Report and is current on its submission of its Quarterly Surveillance Monitoring reports. Ameren Missouri is thus in compliance with Commission Rules 20 CSR 4240-20.093(9) and (10).

6. Ameren Missouri is not delinquent on any assessment, and Staff is not aware of any other matter before the Commission that affects or is affected by this filing. Staff’s recommendation for approval of the EEIC Rider rate changes in this case is solely based on the accuracy of Ameren Missouri’s calculations and **is not indicative of prudence.**

7. Staff recommends approval of the filed tariff sheet under Tracking No. JE-2025-0080, as follows:

P.S.C. MO. No. 6

Sixth Revised Sheet No. 91.23 Cancelling Fifth Revised Sheet No. 91.23.

WHEREFORE, Staff recommends the Commission issue an order approving the Ameren Missouri Rider EEIC tariff sheet, as filed on November 27, 2024.

Respectfully submitted,

/s/ Andrea B. Hansen

Missouri Bar Number 73737

Legal Counsel

Missouri Public Service Commission

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CERTIFICATE OF SERVICE

I hereby certify that copies of the foregoing have been mailed, hand-delivered, or transmitted by facsimile or electronic mail to counsel of record as reflected on the certified service list maintained by the Commission in its Electronic Filing Information System this 13th day of January, 2025.

/s/ Andrea B. Hansen

MEMORANDUM

TO: Missouri Public Service Commission Official Case File
Case No. ER-2025-0168, Tariff Tracking No. JE-2025-0080

FROM: Francisco del Pozo, Economist, Tariff/Rate Design Department
Ezenwanne, Obianuju, Economist, Energy Resources Department

/s/ Francisco Del Pozo 01-13-2025 */s/ Obianuju Ezenwanne 01-13-2025*
Tariff/Rate Design Dept. / Date Energy Resources Dept. / Date

SUBJECT: Staff Recommendation to Approve Union Electric Company, d/b/a Ameren Missouri’s (“Ameren Missouri”) Proposed Tariff Sheet(s) for its Rider Energy Efficiency Investment Charge (“Rider EEIC”)

DATE: January 13, 2025

AMEREN MISSOURI FILING

On November 27, 2024, Ameren Missouri filed with the Missouri Public Service Commission (“Commission”) one (1) tariff sheet to be effective on and after February 1, 2025. The tariff changes adjust the Missouri Energy Efficiency Investment Act (“MEEIA”) Rider EEIC rates. Ameren Missouri’s filing also included the Direct Testimony of J. Neil Graser – Energy Analytics Manager for Ameren Missouri. Ameren Missouri’s filing proposes to decrease the MEEIA revenue requirement from \$95.5 million to \$64.6 million.

STAFF REVIEW

The Rider EEIC charge is reflected as a line item on the customer’s bill labeled “Energy Efficiency Invest. Chg.” The proposed Rider EEIC rate changes are applicable to all kilowatt-hours (“kWh”) of energy supplied to customers served by Ameren Missouri under service classifications rate schedules 1(M) - Residential Service; 2(M) - Small General Service; 3(M) - Large General Service; 4(M) - Small Primary Service; 11(M) - Large Primary Service; and 12(M) - Large Transmission Service, excluding kWh of energy supplied to “opt-out” customers.

The table below provides the current Rider EEIC rate and the Company’s proposed rate.

Rate Class	Current	Proposed
	MEEIA	MEEIA
	Rate/kWh	Rate/kWh
1(M)-Residential Service	\$0.003572	\$0.002171
2(M)-Small General Service	\$0.003739	\$0.002819
3(M)-Large General Service	\$0.003824	\$0.002628
4(M)-Small Primary Service	\$0.003425	\$0.002699
11(M)-Large Primary Service	\$0.003506	\$0.003186
12(M)-Large Transmission Service	\$0.000000	\$0.000000

All else being equal, the average residential charge pursuant to Rider EEIC will decrease by approximately 39.22% or \$1.40 per month per 1,000 kWh. Thus, a residential customer using 1,000 kWh will have a total EEIC charge of approximately \$2.17 monthly or \$26.05 annually. Rider EEIC business rates per class vary due to projected costs, incentives, and customer opt outs per class of customer. The Small General Service rate will decrease by approximately 24.61% or \$0.92 per month per 1,000 kWh; the Large General Service rate will decrease by approximately 31.28% or \$1.20 per month per 1,000 kWh; the Small Primary Service rate will decrease by approximately 21.2% or \$0.73 per month per 1,000 kWh; and the Large Primary Service rate will decrease by approximately 9.13% or \$0.32 per month per 1,000 kWh. The monthly and annual average rate charge per 1,000 kWh are also given in the chart below for each rate class.

Rate Class	Rate Change	Change per x1,000 kWh	% of Change	Average Annual Charge
1(M)-Residential Service	(\$0.001401)	\$(1.40)	-39.22%	\$26.05
2(M)-Small General Service	(\$0.000920)	\$(0.92)	-24.61%	\$33.83
3(M)-Large General Service	(\$0.001196)	\$(1.20)	-31.28%	\$31.54
4(M)-Small Primary Service	(\$0.000726)	\$(0.73)	-21.20%	\$32.39
11(M)-Large Primary Service	(\$0.000320)	\$(0.32)	-9.13%	\$38.23

STAFF RECOMMENDATION

Staff has reviewed the filed tariff sheet, and recommends the Commission issue an order approving the following tariff sheet, as filed on November 27, 2024, for service on and after February 1, 2025, the requested effective date:

P.S.C. MO. No. 6

Sixth Revised Sheet No. 91.23 cancelling the Fifth Revised Sheet No. 91.23

Staff has verified that Ameren Missouri has filed its Annual Report and is current on its submission of its Quarterly Surveillance Monitoring reports. Ameren Missouri is thus in compliance with Commission Rules 20 CSR 4240-20.093(9) and (10). Staff has verified that Ameren Missouri is not delinquent on any assessment and Staff is not aware of any other matter before the Commission that affects or is affected by this filing. Staff's recommendation for approval of the EEIC Rider rate changes in this case are solely based on the accuracy of Ameren Missouri's calculations and is not indicative of prudence.

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In the Matter of Union Electric Company)
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Adjustment Relating to MEEIA EEIC Rider)

File No. ER-2025-0168
Tariff No. JE-2025-0080

AFFIDAVIT OF FRANCISCO DEL POZO

STATE OF MISSOURI)
) ss.
COUNTY OF COLE)

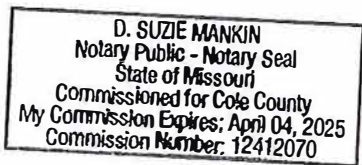
COMES NOW FRANCISCO DEL POZO and on his oath declares that he is of sound mind and lawful age; that he contributed to the foregoing *Staff Recommendation* in memorandum form; and that the same is true and correct according to his best knowledge and belief.

Further the Affiant sayeth not.

FRANCISCO DEL POZO

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 9th day of January 2025.



Notary Public

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AFFIDAVIT OF OBIANUJU EZENWANNE

STATE OF MISSOURI)
) ss.
COUNTY OF COLE)

COMES NOW OBIANUJU EZENWANNE and on her oath declares that she is of sound mind and lawful age; that she contributed to the foregoing *Staff Recommendation*, in Memorandum form; and that the same is true and correct according to her best knowledge and belief.

Further the Affiant sayeth not.




OBIANUJU EZENWANNE

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 9th day of January 2025.

D. SUZIE MANKIN
Notary Public - Notary Seal
State of Missouri
Commissioned for Cole County
My Commission Expires: April 04, 2025
Commission Number: 12412070



Notary Public