

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

In the Matter of Union Electric)	
Company d/b/a Ameren Missouri's)	
3 rd 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 an unopposed *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 Company filed a Request to Approve Technical Resource Manual and Deemed Savings Table and Motion for Expedited Treatment on November 27, 2024. On December 11, 2024, the Commission granted the Company's request for the program measures listed in Appendix A of Staff's Recommendation. The Company requested clarification of the Commission's Order on December 20, 2024, and the Commission granted the request on January 15, 2025.

3. The Company has updated the Technical Resource Manual (“TRM”) and associated appendices to reflect the measures in Staff's Appendix A as modified by the

Commission's January 15, 2025, Order. The request is being filed after consultation with Commission Staff. Commission Staff indicated that based on their review to date, they do not have any concerns at this time.

4. The 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 Demand Side Investment Mechanism ("DSIM") true-up provisions.¹ 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 into those formulas based on utility-specific evaluation results. Accordingly, revisions to the TRM can necessitate revisions to the Deemed Savings Table.

5. 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 as approved by the Commission for previous TRMs and as approved on December 11, 2024 and January 15, 2025.

6. 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:

¹ "Demand-side Investment Mechanism."

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

7. 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 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 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.

8. 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:

² A correction to the filing was made on October 29, 2020.

Table 2 List of Attachments Encompassing Revisions to TRM and Deemed Savings Table	
Name	Description
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 G – TRM-Vol 1 Overview and User Guide_Clean	Clean copy of revised TRM-Vol 1 Overview and User Guide
Appendix G – TRM-Vol 1 Overview and User Guide_Redline	Redline copy of revised TRM-Vol 1 Overview and User Guide
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
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

9. Finally, Ameren Missouri requests expedited treatment of this *Request*. Ameren Missouri filed this petition as soon as it could be filed after the Commission's January 15, 2025 Order. The request is being filed in compliance with the *Agreement* and the Commission's Orders. The Company requests approval on or about February 27, 2025, so that these revisions can go into effect with the program year beginning January 1, 2025. The Company will 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 with the January 1, 2025, effective date of the program year.

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 February 27, 2025.

Respectfully submitted,

/s/ Jennifer S. Moore

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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 30th day of January 2025, to counsel for all parties on the Commission's service list in this case.

/s/ Jennifer S. Moore
Jennifer S. Moore