

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

In the Matter of Union Electric Company d/b/a )  
Ameren Missouri's Electric Service Tariffs ) **Case No. ER-2022-0146**  
Adjustment Relating To MEEIA Rider EEIC ) Tariff No. YE-2022-0171

**STAFF RECOMMENDATION**

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

1. On December 1, 2021, Union Electric Company d/b/a Ameren Missouri (Ameren Missouri) filed a *Tariff Revision*, tracking number YE-2022-0171, to adjust the rates of its Energy Efficiency Investment Charge (EEIC). The proposed tariff carries an effective date of February 1, 2022.

2. Ameren Missouri's proposed tariff revisions would decrease Rider EEIC rates by approximately \$53.4 million, or 37%.

3. Under 20 CSR 4240 20.093(4), utilities shall file to adjust its DSIM rate no less often than annually. In doing so, the utility must file updated tariff sheets with all models and spreadsheets provided as executable version in native form with all links and formulas intact. 20 CSR 4240-20.093(4)(A). The information filed must include: 1) the amount of revenue that has been over- or under-recovered in the most recent period by rate class, 2) proposed positive or negative adjustments by rate class, 3) the utility's short-term borrowing rate, 4) the proposed adjustments to the current DSIM rates, 5) complete documentation for the proposed adjustments to the current DSIM rates, and 6) any additional information the commission has ordered. 20 CSR 4240-20.093(4)(A).

4. Staff must examine and analyze the information and additional discovery, with a recommendation to be filed no later than thirty (30) days after the utility filed its revised tariff sheets. 20 CSR 4240-20.093(4)(B).

5. Adjustments to DSIM rates “shall reflect a comprehensive measurement of both increases and decreases to the DSIM amount established in the most recent demand-side program approval or DSIM rate adjustment case plus the increases and decreases to the DSIM amount which occurred since the most recent demand-side program approval or DSIM rate adjustment case.” 20 CSR 4240-20.093(4)(C). All adjustments must include a true-up of past DSIM collections based on the latest evaluation, measurement, and verification (EM&V) results where applicable. 20 CSR 4240-20.093(4)(C).

6. The utility must be current on its submission of surveillance monitoring reports required under 20 CSR 4240-20.093(10) and its annual reports as required in 20 CSR 4240-20.093(9) before it can increase DSIM rates. 20 CSR 4240-20.093(4)(D).

7. The Commission can either enter an order approving the tariff sheets in accordance with 20 CSR 4240-20.093(4), Section 393.1075, RSMo, and the DSIM established in the utility’s most recent filing, or allow the tariff to take effect sixty (60) days after the tariff sheets were filed. 20 CSR 4240-20.093(4)(B).

8. For the reasons stated in Staff’s Memorandum, attached hereto and incorporated by reference, Staff recommends the Commission approve tariff sheet tracking number YE-2022-0171, as filed on December 1, 2021, and effective on and after February 1, 2022.

**WHEREFORE**, Staff recommends that the Commission issue an order approving the following tariff sheet, number YE-20220-0171, as filed on December 1, 2021, with an effective date of February 1, 2022, and for such other and further relief as the Commission deems just and reasonable:

**P.S.C. MO. No. 6**

2<sup>nd</sup> Revised Sheet No. 91.23, Cancelling 1<sup>st</sup> Revised Sheet No. 91.23

Respectfully submitted,

**/s/ Curt Stokes**

Curt Stokes  
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**Counsel for Staff of the  
Missouri Public Service Commission**

**CERTIFICATE OF SERVICE**

I hereby certify that a true and correct copy of the foregoing was served by electronic mail, or First Class United States Postal Mail, postage prepaid, on this 28<sup>th</sup> day of December, 2021, to all parties and/or counsels of records.

**/s/ Curt Stokes**

Curt Stokes

## MEMORANDUM

**TO:** Missouri Public Service Commission Official Case File  
Case No. ER-2022-0146, Tariff Tracking No. YE-2022-0171

**FROM:** Robin Kliethermes, Manager, Tariff and Rate Design Department  
Hari Poudel, Economist, Tariff and Rate Design Department

/s/ Robin Kliethermes      12-28-21  
Industry Analysis Division / Date

/s/ Curt Stokes      12-28-21  
Staff Counsel's Office / 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:** December 28, 2021

### AMEREN MISSOURI FILING

On December 1, 2021, Ameren Missouri filed, with the Commission, one tariff sheet to be an effective on and after February 1, 2022. The tariff changes adjust the Missouri Energy Efficiency Investment Act ("MEEIA") Rider EEIC rates. Ameren Missouri's filing also included the Direct Testimony of Craig P. Aubuchon. As filed, Ameren Missouri's overall Rider EEIC rate will collect approximately \$91.9 million, decreasing Rider EEIC rates by approximately \$53.4 million, or 37%.<sup>1</sup>

### BACKGROUND

The total proposed Rider EEIC rates are the sum of the remaining MEEIA 2016-18 Energy Efficiency Investment Rate ("EEIR") Components (MEEIA Cycle 2)<sup>2</sup> and the currently effective MEEIA 2019-21 EEIR Components (MEEIA Cycle 3). Additionally, the total Rider EEIC rates also include a small portion of forecasted program costs and throughput disincentive for the extended MEEIA Cycle 3 programs approved in EO-2018-0211. The MEEIA Cycle 1 programs ended on December 31, 2015, and have been fully recovered.

Ameren Missouri's first MEEIA programs were approved in EO-2012-0142. Further, Ameren Missouri's second three-year MEEIA cycle was approved in EO-2015-0055 and Ameren Missouri's third three-year MEEIA cycle was approved in Case No. EO-2018-0211. Lastly, Ameren Missouri's MEEIA Cycle 3 was currently extended for a fourth year through the end of 2022 in Case No. EO-2018-0211. Below is a summary of the program costs,

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<sup>1</sup> Ameren Missouri's filing proposes to decrease the MEEIA revenue requirement from \$145.3 million to \$91.9 million.

<sup>2</sup> The earnings opportunity is the largest unrecovered EEIR component for MEEIA Cycle 2 followed by reconciliations for under/over recoveries relating to program cost and throughput disincentive.

throughput disincentive, earnings opportunity and kWh saved for all three MEEIA cycles to date.

	MEEIA Cycle 1	MEEIA Cycle 2	MEEIA Cycle 3	MEEIA Cycle 3 (extended through January 2023)	Total
Program Cost	\$ 135,502,214	\$ 157,048,581	\$ 208,290,048	\$ 69,422,259	\$ 570,263,101
Through Disincentive Earnings	\$ 173,275,815	\$ 90,214,489	\$ 46,207,036	\$ 15,155,864	\$ 324,853,204
Earning Opportunity/Performance	\$ 28,246,579	\$ 42,889,494	\$ 15,721,089		\$ 86,857,162
<b>Total Cost</b>	\$ 337,024,608	\$ 290,152,564	\$ 270,218,173		\$ 897,395,346
Gross kWh Saved	1,152,915,000	955,297,948	990,806,707		
Evaluated kWh Saved		888,229,823			
Avg. cost per avoided kWh	\$ 0.2923	\$ 0.3267	\$ 0.2727		

Ameren Missouri is projecting that the MEEIA Cycle 3 program costs and throughput disincentive will be approximately \$84.6 million through January 2023. Therefore, as shown in the table above, Ameren Missouri is projecting to have recovered from ratepayers through January 2023 approximately \$981 million for energy efficiency programs since MEEIA programs began in January 2013.

The Rider EEIC charge is reflected in one 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.

**STAFF REVIEW**

The table below provides the current Rider EEIC rate and the Company’s proposed rate.<sup>3</sup>

Rate Class	Current	Proposed
	MEEIA	MEEIA
	Rate/kWh	Rate/kWh
1 (M) -Residential Service	\$0.005318	\$0.003757
2 (M) -Small General Service	\$0.005811	\$0.003430
3 (M) -Large General Service	\$0.005592	\$0.003262
4 (M) -Small Primary Service	\$0.005503	\$0.003227
11 (M) -Large Primary Service	\$0.005590	\$0.002980
12 (M) -Large Transmission Service	\$0.000000	\$0.000000

<sup>3</sup> The MEEIA rate listed in the table is the sum of MEEIA Cycle 2 and MEEIA Cycle 3 cost components.

All else being equal, the average<sup>4</sup> residential change pursuant to Rider EEIC will decrease by approximately 29.4% or \$1.59 per month. A residential customer, using 1,000 kWh will have a total EEIC charge of approximately \$3.76 month or \$45.08 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 41% or \$2.38 per month per 1,000 kWh; the Large General Service rate will decrease by approximately 41.7% or \$2.33 per month per 1,000 kWh; the Small Primary Service rate will decrease by approximately 41.4% or 2.28 per month per 1,000 kWh; the Large Primary Service rate will decrease by approximately 46.7% or 2.61 per month per 1,000 kWh.

### **STAFF RECOMMENDATION**

The Commission Staff's Tariff / Rate Design Department ("Staff") has reviewed the filed tariff sheet. Staff recommends the Commission issue an order approving the following tariff sheet, as filed on December 1, 2021 for service on and after February 1, 2022, the requested effective date:

P.S.C. MO. No. 6

Second Revised Sheet No. 91.23 cancelling the First Revised Sheet No. 91.23

Staff has verified that Ameren Missouri is not delinquent on any assessment and has filed its Annual Report. 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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<sup>4</sup> Staff used 1,000 kWh to determine an average customer bill.

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

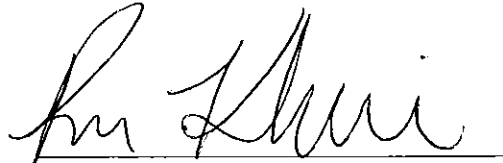
In the Matter of Union Electric Company     )  
d/b/a Missouri's Electric Service Tariffs     )     File No. ER-2022-0146  
Adjustment Relating to MEEIA Rider EEIC    )

**AFFIDAVIT OF ROBIN KLIETHERMES**

COUNTY OF COLE            )  ss.  
                                  )

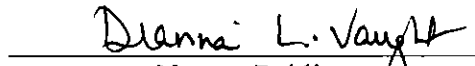
**COMES NOW** Robin Kliethermes, and on her oath declares that she is of sound mind and lawful age, that she contributed to the foregoing *Staff Recommendation in Memorandum form*; and that the same is true and correct according to her best knowledge and belief.

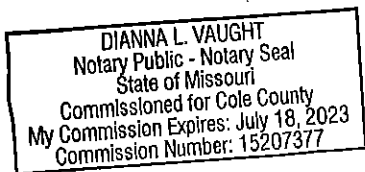
Further the Affiant sayeth not.

  
\_\_\_\_\_  
Robin Kliethermes

**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 27<sup>th</sup> day of December, 2021.

  
\_\_\_\_\_  
Notary Public



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

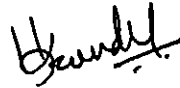
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Adjustment Relating to MEEIA Rider EEIC     )        File No. ER-2022-0146

**AFFIDAVIT OF HARI POUDEL**

COUNTY OF COLE        ) ss.  
                                  )

COMES NOW Hari Poudel, 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.

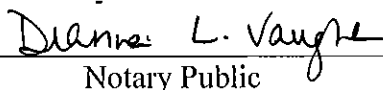
Further the Affiant sayeth not.



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Hari Poudel

**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 27<sup>th</sup> day of December, 2021.

  
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Notary Public

DIANNA L. VAUGHT  
Notary Public - Notary Seal  
State of Missouri  
Commissioned for Cole County  
My Commission Expires: July 18, 2023  
Commission Number: 15207377