

In the Matter of Ameren Missouri's Request for a)
Variance from the Triennial Filing Date Requirement) EE-2015-
Found in 4 CSR 240-22.080)

COMES NOW, Union Electric Company, d/b/a Ameren Missouri (Ameren Missouri or Company), and for its *Request for Variance from 4 CSR 240-22.080(1)(C)*(Request), states as follows:

2. Ameren Missouri requests that the Commission grant the Company a variance from this requirement and allow it to make its next triennial compliance filing on or before October 1, 2017.

3. Ameren Missouri’s process for producing its triennial Integrated Resource Plan (IRP) filing under the Commission’s Chapter 22 rules is closely linked to its process for gaining Commission approval for demand-side management (DSM) programs under the Commission’s Chapter 20 rules implementing the requirements of the Missouri Energy Efficiency Investment Act (MEEIA).

4. Ameren Missouri's current MEEIA request before the Commission (File No. EO-2015-0055) is expected to result in approved programs, cost recovery and incentive mechanisms

for the period of 2016-2018. Ameren Missouri's next three-year cycle of programs under MEEIA would cover the years 2019-2021.

5. The Commission's MEEIA rules require that electric utilities conduct a new DSM potential study no less than every four years.¹ Specific requirements in the Commission's MEEIA rules also link review and approval of DSM programs and cost recovery and incentive mechanisms to analyses included in triennial IRP filings.² Specifically, the MEEIA rules require that the portfolio of programs for which approval is being requested have been evaluated through the integration process required by 4 CSR 240-22.060, which must also be conducted in conjunction with the development of the utility's most recent triennial IRP filing. As a result, Ameren Missouri conducts its DSM potential studies on a three-year cycle, ensuring consistency between the DSM potential results used as the basis for both triennial IRP filings and MEEIA requests and minimizing the need for redundant analysis efforts.

6. To support an IRP filing date of April 1, 2017, as required by the Chapter 22 rules, Ameren Missouri's next DSM potential study would need to be completed and IRP inputs fully developed by July 1, 2016. To achieve completion by this date, the process of recruiting a consultant to conduct the DSM potential study should have begun in February of 2015, approximately three months ago and well before the conclusion of the Company's current MEEIA case.

7. In contrast, supporting an IRP filing date of October 1, 2017, would require initiation of the DSM potential study in August of 2015. This six-month delay offers several benefits:

¹ 4 CSR 240-3.164(2)(A).

² 4 CSR 240-20.094(3)(A)3.

- a. To support implementation of programs in 2019-2021, Ameren Missouri would need to file its MEEIA request for approval of programs, cost recovery and incentive mechanisms in November or December of 2017. The results of a potential study completed in the second quarter of 2016 (as would be necessary to support an April 1, 2017 IRP filing date) would be approximately 18 months old by the time the MEEIA request is filed. Delaying the start of the DSM potential study by six months reduces the lag to approximately 12 months.
- b. For its 2014 IRP, filed on October 1, 2014, Ameren Missouri was able to incorporate findings from its Evaluation, Measurement and Verification (EM&V) process with respect to the performance of its DSM programs in 2013 into its analysis of DSM programs in the IRP analysis. An IRP filing date of October 1, 2017, would allow Ameren Missouri to incorporate the results of a 2016 EM&V into its 2017 IRP evaluation. The first year in the three-year program cycle under consideration by the Commission in the Company's current MEEIA case is 2016. Absent a delay, only EM&V through 2015 programs could be incorporated into the 2017 IRP analysis.
- c. Initiating a new potential study prior to the conclusion of the Company's current MEEIA case may frustrate efforts to incorporate any learnings or issue resolutions resulting from the current MEEIA case into the next potential study. Delaying the process by six months allows for incorporation of such learnings and resolutions and also allows for more thorough consideration of additional refinements to the potential study process and objectives.

d. Finally, delaying the IRP filing date to October 1, 2017, ensures that the most up-to-date information regarding DSM potential is used for both the IRP filing and the Company's 2019-2021 MEEIA request while satisfying the IRP analysis requirements of the MEEIA rules.

8. Accurate evaluation of the potential for demand-side resources is a critical component of electric utility resource planning and, for that reason, the Company believes it is important that its 2017 Chapter 22 triennial compliance filing integrated resource analysis, risk analysis and strategy selection and its 2019-2021 MEEIA plan be as consistent as possible.

WHEREFORE, Ameren Missouri asks the Missouri Public Service Commission to grant it a variance from the filing date requirement of 4 CSR 240-22.080(1)(C) and allow the Company until October 1, 2017 to make its triennial compliance filing.

Respectfully submitted,

/s/ Wendy K. Tatro

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**ATTORNEYS FOR UNION ELECTRIC
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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 1st day of June, 2015, to the Commission Staff and the Office of the Public Counsel.

/s/ Wendy K. Tatro