

**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-2018-0211
Changes in Furtherance of Energy)	
Efficiency as Allowed by MEEIA.)	

REQUEST TO REVISE
TECHNICAL RESOURCE MANUAL AND DEEMED SAVINGS TABLE

COMES NOW Union Electric Company d/b/a Ameren Missouri (“Ameren Missouri” or “Company”), and submits this *Request to Revise Technical Resource Manual and Deemed Savings Table* (“*Request*”) to the Missouri Public Service Commission (“Commission”) for approval. In support thereof, the Company respectfully states as follows:

1. On October 25, 2018, Ameren Missouri and certain other parties to this proceeding submitted an unopposed *Stipulation and Agreement* (“*Agreement*”) to the Commission for approval. After receiving no objections, the Commission issued its *Order Approving Non-Unanimous Stipulation and Agreement and Granting Waivers* on December 5, 2018. That *Agreement* included the submission of a revised *Ameren Missouri 2019-21 MEEIA Energy Efficiency Plan* (“*Report*”) and its associated Appendices A through N.

2. In approving the *Agreement*, the Commission also approved a Company-specific Technical Resource Manual (“TRM”) (Appendices G, H, and I to the *Report*) and Deemed Savings Table (Appendix F to the *Report*). 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 DSIM¹ true-up provisions). The Deemed Savings Table represents the application of the

¹ “Demand-side Investment Mechanism”

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.

3. Ameren Missouri's 2019-21 Energy Efficiency Plan ("MEEIA 2019-21") anticipates a dynamic TRM with annual updates responsive to evaluation, measurement, and verification ("EM&V") results. See Ameren Missouri's MEEIA Cycle 3 Report submitted as part of the *Agreement* on October 25, 2018, at pages 40 – 41 for more information regarding this process.

4. The following overarching factors have driven the need for updates to the TRM and Deemed Savings Table:

- The revisions are based upon plan year 2017 evaluation results. This approach applied the results from the 2017 EM&V results to update input values within the MEEIA 2019-21 Deemed Savings Table.
- The revisions update and correct certain items pursuant to the *Agreement*:
 - In the HVAC portion of the Deemed Savings Table, the updates fixed incremental cost calculations identified while investigating concerns expressed by the Commission Staff about the cost-effectiveness of certain measures; and
 - The Demand Response language as provided in the *Agreement* was added for further clarification to the bottom of Appendix I, TRM-Volume 3 and Appendix H, TRM-Volume 2.
- The revisions also update and correct certain items identified since the *Agreement* was filed and approved:
 - Formatting and terminology was corrected in a manner that does not impact associated measure savings/cost values (e.g., the program/channel terminology used across measures within the TRM was standardized and the use of acronyms was made more consistent, including as used in both the TRM and Deemed Savings Table);
- The HVAC Deemed Savings Table contained a formula on central air conditioning units that was in error. The formula was applying both the first and second tier of the life of early replacement measures at a 10 SEER base rather than applying the second tier of the life at a 13 SEER base. Correcting this error reduces the savings in the second tier of the life for these early replacement measures;

- Across the residential portion of the Deemed Savings Table, a few instances were identified where the kW for “Building Shell” and “HVAC” end-use measures were referenced incorrectly. In these instances, only the cooling kWh savings were being multiplied by the Coincident Peak Factor, when total kWh should have been applied in the calculation. Although this is a correction to the Deemed Savings Table, this did not impact the kW values associated with the MEEIA 2019-21 filing because the submittal tool values depicted the correct kW values by calculating this separately from the values shown in the Deemed Savings Table. The affected Deemed Savings Table measure groups are reflected in the following Table 1:

Table 1 Deemed Tables and Measure Groups Affected by Incorrect KW for “Building Shell” and “HVAC”	
Deemed Table	Measure Group
Kits	Dirty Filter Alarm
HVAC	ECM/Blower Motor
Income Eligible	Air Sealing
	Ceiling Insulation
	Floor Insulation
	Dirty Filter Alarm
	Duct Repair (Duct Sealing and Repair – Methodology 3)
	ECM/Blower Motor
MFMR	Ceiling Insulation
	Dirty Filter Alarm
	ECM/Blower Motor

Ameren Missouri provided these proposed revisions to MEEIA 2019-21 stakeholders, and received no feedback. The implementation team and the evaluators aided in gathering the data and workpapers used by the Company, and have been provided with these resulting updates. Additionally, the measure changes have undergone a cost effectiveness analysis, and will not require any adjustment of the portfolio's goals.

5. 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:

Table 2	
List of Attachments Encompassing Revisions to TRM and Deemed Savings Table²	
Name	Description
Appendix F – Deemed Savings Table	Clean, corrected copy of Deemed Savings Table in PDF format
Appendix F - Deemed Savings Table_Clean	Clean, corrected copy of Deemed Savings Table in executable Excel format
Appendix F - Deemed Savings Table_Redline	Redlined copy of Deemed Savings Table in Excel format
Appendix H – TRM-Vol 2_Bus_Clean	Clean, corrected copy of Appendix H, TRM Volume 2 - Business
Appendix H – TRM-Vol 2_Bus_Redline	Redlined version of corrected Appendix H, TRM Volume 2 – Business to illustrate location of revisions
Appendix I – TRM Vol 3_Res_Clean	Clean, corrected copy of Appendix I – TRM Volume 3 - Residential
Appendix I – TRM Vol 3_Res_Redline	Redlined version of corrected Appendix I, TRM Volume 3 – Residential to illustrate location of revisions

² While the TRM is made of up three volumes (Appendices G through I), only Appendices H and I required revision.

WHEREFORE, Ameren Missouri requests the Commission issue an order approving the proposed revisions to the TRM (Appendices H and I) and Deemed Savings Table (Appendix F).

Respectfully submitted,

/s/ Paula N. Johnson

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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 31st day of December, 2018, to counsel for all parties on the Commission's service list in this case.

/s/ Paula N. Johnson