

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

In the Matter of Union Electric Company d/b/a)
Ameren Missouri's 3rd Filing to Implement) File No. EO-2018-0211
Regulatory Changes in Furtherance of Energy)
Efficiency as Allowed by MEEIA.)

NOTIFICATION

COMES NOW Union Electric Company d/b/a Ameren Missouri ("Ameren Missouri" or "Company") and, pursuant to the terms of its tariffs approved to implement the energy efficiency portfolio approved in this case, submits the following:

1. Ameren Missouri's Change Process tariff, found at Sheet No. 221.4 of its Energy Efficiency MEEIA 2019-21 tariffs, states that the Company will file a notice in this case prior to making a change in its measure and/or incentive amount offering.

2. Ameren Missouri is modifying the incentives offered for four of its energy efficiency programs. Specifically, Ameren Missouri is making the following modifications, effective March 2, 2020:

- **Residential Heating and Cooling Program:** Ameren Missouri is making the following revisions to this program:

- High-SEER Measures: We are separating the high SEER CAC¹ and ASHP² measures. Currently, these measures are grouped as 18+ SEER ASHP and 17+ SEER CAC. We are now going to break them out as follows in order to align incentives with the efficiency of the system: 17-SEER; 18-SEER; 19-SEER; 20-SEER; and 21+SEER.

¹ Central air conditioning.

² Air Source Heat Pump.

- Additional ASHP Options: We are adding incentives for ASHP replacement-on-fail and new construction scenarios as they are found to be cost-effective.
- (ECMs)³ and System Incentives: We are removing the \$50 ECM rebate and increasing the system rebate by a commensurate amount, which will keep the customer-facing system rebate constant from 2019 to 2020.⁴
- Additional Distributor Channel: The Company is developing a channel that will provide a distributor rebate for 19 SEER and above ductless measure, 18 SEER and above CAC measures, and 18 SEER and above ASHP measures. Ductless systems will be offered to help customers avoid more inefficient measures (e.g., fans, space heaters, etc.). Distributors will market, promote, stock, and train the contractors on these measures. For ductless systems, the program will provide training for distributors and contractors that ASHP and ductless systems cannot be for replacing existing gas systems. Customers will receive an instant rebate on their invoice from the contractor. The channel will be deployed in two phases: March 2 through April 30 is the training and enrollment period for distributors; and May 1 forward, the measures will be moved from the contractor channel to the distributor channel.
- **Multi-Family Market Rate Program**: For this program, Ameren Missouri is changing incentives for all measures in order to increase participation and

³ Electronically Commutated Motors.

⁴ For example, in 2019, a 16-SEER CAC received a rebate of \$450, plus an additional \$50 rebate for the ECM, for a total of \$500. For 2020, a 16-SEER CAC will receive a system rebate of \$500.

improve the cost effectiveness of the program. The incentives per property building per year will be limited to \$100,000 and 75% of the total project cost.

- **Multi-Family Income Eligible Program.** Ameren Missouri is changing to a more equitable incentive range and is changing the program caps. The Company is changing incentives for all measures. The Company will be limiting incentives per property to \$500,000 per year and \$1.5 million over three years. Multifamily properties that are time bound by Low-Income Housing Tax Credit will be exempt from the annual incentive limits. These changes will allow the participation of more multi-family properties.
- **Single Family Eligible Income.** Finally, the Company is adding floor insulation measures for mobile homes that have some existing floor insulation.
- **Deemed Savings Table.** In addition to the changes described above, the Company is updating the Deemed Savings Table as a general clean-up of items that do not impact other offered measures.

3. Please see the following attachments, which incorporate these changes:

- Attachment A – Redlined version of the Ameren Missouri Heating and Cooling Program Rebate Chart for New Construction – Residential Electric Customers Only
- Attachment B – Redlined version of the Ameren Missouri Heating and Cooling Program Rebate Chart – Residential Electric Customers Only
- Attachment C – Redlined version of Ameren Missouri Residential Energy Efficiency – Program Measures and Incentives for the Ameren Missouri Residential Program(s)

- Attachment D – Clean version of Ameren Missouri Residential Energy Efficiency – Program Measures and Incentives for the Ameren Missouri Residential Program(s)
- Attachment E – Brochure for Ameren Missouri Residential Energy Efficiency Program – Income Eligible Multifamily Property Owners and Managers
- Attachment F – Brochure for Ameren Missouri Residential Energy Efficiency Program – Multifamily Property Owners and Managers
- Attachment G – Redline version of Deemed Savings Table (Appendix F to Ameren Missouri's 2019-21 MEEIA Report)
- Attachment H – Clean version of Deemed Savings Table (Appendix F to Ameren Missouri's 2019-21 MEEIA Report)

WHEREFORE, Ameren Missouri respectfully files this *Notification* in compliance with the terms of its tariff.

Respectfully submitted,

/s/ Paula N. Johnson

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**ATTORNEY FOR UNION ELECTRIC
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CERTIFICATE OF SERVICE

The undersigned certifies that true and correct copies of the foregoing have been e-mailed to counsel of record in this case on this 13th day of February, 2020.

/s/ Paula N. Johnson

Paula N. Johnson