BEFORE THE PUBLIC SERVICE COMMISSION OF THE STATE OF MISSOURI

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In the Matter of Union Electric Company d/b/a Ameren Missouri's 3rd Filing to Implement Regulatory Changes in Furtherance of Energy Efficiency as Allowed by MEEIA.

File No. EO-2018-0211

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 plans to implement changes to 1) add measures to its residential Heating and Cooling program, 2) change the efficiency level requirement for removed equipment in the early replacement scenario in its Heating and Cooling program, 3) to remove a direct install measure from its Pay as You Save ("PAYS[®]") program, and 4) to shift funds approved for the PY2024 Multifamily Low Income Program to PY2021.

3. Specifically, for the Heating and Cooling program, additional measures will be added to the Residential Heating and Cooling Program to provide incentives to customers that have made a decision to switch heating technologies. These switches could be from a central air conditioner plus a non-electric heat source to an air source heat pump, or from an air source heat pump to a central air conditioner and a gas furnace. In both cases, Ameren Missouri would only count cooling savings. Incentives would be set as the incentive for a central air conditioner of comparable efficiency level. The incentives, therefore, are not to encourage switching between technologies, but instead to encourage a customer that has already made a decision to switch technologies to install more efficient equipment.

4. In addition, for the Heating and Cooling program, the existing equipment eligibility requirement for customers replacing an existing, working system will change from \leq 12 SEER to \leq 13.99 SEER to account for the aging of installed equipment in the service territory as recommended in the last two evaluation reports.

5. For the PAYS® program, water heater wraps will be removed from the list of direct install measure for two reasons. Technical Resource Manual updates from October 2020 show the measure level Total Resource Cost test results to be 0.74, and several manufacturers warranties could be voided with the installation of "third party appliances" such as water heater wraps. Given the non-cost effective nature of the measure and limitations on where these should be installed it is appropriate to remove them from the program.

6. Based on increased participation in the Multifamily Low Income Program in 2021, we are requesting a shift of \$750,000 of PY2024 approved budget to PY2021 to cover the additional incentives as outlined in MEEIA 2019-21 Stipulation and Agreement. The increases are based in part in the following areas:

- all electric multifamily projects with a high percentage of ASHP upgrades replacing inefficient electric furnaces, baseboard heat, etc. and,
- dual fuel projects associated with co-delivery with natural gas utilities.
- 7. The following attachments are included with this filing:
 - <u>Attachment A</u> Redline version of HVAC Rebate Chart
 - <u>Attachment B</u> Redline version of MEEIA 2019-22 Residential Program Incentives

- <u>Attachment C</u> Clean version of MEEIA 2019-22 Residential Program Incentives
- <u>Attachment D</u> Website Mock-Up

WHEREFORE, Ameren Missouri respectfully files this Notification in compliance with

the terms of its tariff.

Respectfully submitted,

<u>/s/ Paula N. Johnson</u> Paula N. Johnson, MO Bar #68963 Senior Corporate Counsel P.O. Box 66149, MC 1310 St. Louis, MO 63166-6149 (314) 554-3533 (phone) (314) 554-4014 (fax) AmerenMOService@ameren.com

Attorney for Union Electric Company d/b/a Ameren Missouri

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 22^{nd} day of September, 2021.

1s/ Paula N. Johnson

Paula N. Johnson