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 Regulatory Changes in) File No.	EO-2018-0211
Furtherance of Energy Efficiency as)	_
Allowed by MEEIA)	

STAFF OBJECTION TO PROPOSED MEEIA EXTENSION

COMES NOW the Staff of the Missouri Public Service Commission ("Staff") and for its Objection to Union Electric Company d/b/a Ameren Missouri's ("Ameren") proposed extension of its MEEIA 2019-2021 Plan through December 21, 2022, respectfully states:

- 1. On May 13, 2020, Ameren filed an application to modify its Demand-Side Management and Portfolio Plan for its MEEIA 2019-2021 Plan in order to extend the plan an additional year, through December 31, 2022.
- 2. After reviewing the application, as well as discussions with Ameren and other stakeholders, Staff has concerns that there has not been enough time for a proper analysis of the application. Among its concerns, Staff at this time is of the position that the application does not comply with Commission Rule 20 CSR 4240-20.094(4)(C)4, which states that, to demonstrate the cost-effectiveness of programs, the application include "The impacts from all demand-side programs included in the application on any postponement of new supply-side resources and the early retirement of existing supply-side resources, including annual and net present value of any lost utility earnings related thereto."
- 3. Staff further notes that the application is not merely an extension of the current Cycle 3, but may be more akin to a one-year plan. Due to its magnitude Staff

must object in order to give it additional time to analyze the application and discuss any Staff concerns with Ameren.

- 4. As to the variances requested, Staff has concerns that the application as is does not justify a variance from Commission Rules 20 CSR 4240-20.094(4)(C)3 and 20.094(4)(I)3.
- 5. This does not constitute a comprehensive list of Staff's objections to the application, and if this matter were to go to hearing, Staff reserves the right to address further issues than those discussed herein.
- 6. Staff believes that further analysis and discussions with Ameren could help to alleviate its concerns. However, at this time, Staff must object to the application.

WHEREFORE, Staff respectfully submits its Objection for the Commission's consideration.

Respectfully Submitted,

/s/ Travis J. Pringle

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CERTIFICATE OF SERVICE

I hereby certify that copies of the foregoing have been mailed, hand delivered, transmitted by facsimile or electronically mailed to all counsel of record this 12th day of June, 2020.

/s/ Travis J. Pringle