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 Changes in) File No. EO-	<u> 2018-0211</u>
Furtherance of Energy Efficiency as)	
Allowed by MEEIA)	

STAFF RECOMMENDATION FOR APPROVAL OF MODIFICATIONS TO TECHNICAL RESOURCE MANUAL AND DEEMED SAVINGS TABLE

COMES NOW the Staff of the Missouri Public Service Commission, by and through undersigned counsel, and hereby recommends that the Commission approve the proposed revisions to the Technical Resource Manual ("TRM") and the deemed savings table sought by Union Electric Company d/b/a Ameren Missouri ("Ameren Missouri") in its November 15, 2019 filing. In further support Staff states as follows:

- 1. On November 15, 2019, Ameren Missouri filed an application to revise its TRM and deemed savings table. These proposed modifications require Commission approval, as the *Stipulation and Agreement*¹ resolving all Cycle 3 application issues in Case No. EO-2018-0211 states on page 41 that, "The TRM and Deemed Savings Table are living documents that will be updated periodically throughout MEEIA 2019-21. Changes to the TRM will be submitted for Commission approval and will likely be a result of evaluations and/or the need to add additional measures."
- 2. As more fully discussed in Staff's Memorandum, attached hereto as Appendix A, the Staff has reviewed the proposed modifications contained in the

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¹ On December 5, 2018, the Commission approved the Stipulation in its *Order Approving Stipulation and Agreement and Granting Waivers.*

application and is of the opinion that these modifications are reasonable and should be approved by the Commission.

WHEREFORE, the Staff respectfully requests the Commission accept its recommendation and approve the modifications.

Respectfully submitted,

Isl Nicole Mers

Nicole Mers Deputy Staff Counsel Missouri Bar No. 66766 P.O. Box 360 Jefferson City, MO 65012 (573) 751-6651 (Telephone) (573) 751-9285 (Fax) Nicole.mers@psc.mo.gov

Attorney for the Staff of the Missouri Public Service Commission

CERTIFICATE OF SERVICE

I do hereby certify that a true and correct copy of the foregoing document has been electronically mailed this 6th day of December, 2019 to all counsel of record in this proceeding.

/s/ Nicole Mers

MEMORANDUM

TO: Missouri Public Service Commission Official Case File

File No. EO-2018-0211

Union Electric Company d/b/a Ameren Missouri

FROM: Mark Kiesling, Utility Management Analyst III

Energy Resources Department

DATE: /s/ Brad Fortson ______12/5/2019 /s/ Nicole Mers _____12/5/2019

Energy Resources Department / Date Staff Counsel Department / Date

SUBJECT: Staff Recommendation For Approval Of Revision to Union Electric Company d/b/a

Ameren Missouri's Technical Resource Manual and Deemed Savings Table

DATE: December 5, 2019

INTRODUCTION AND BACKGROUND

On November 15, 2019, Union Electric Company d/b/a Ameren Missouri ("Ameren Missouri") filed a *Request to Revise Technical Resource Manual and Deemed Savings Table and Motion for Expedited Treatment* ("Request"). On November 26, 2019, the Commission ordered Staff to file either a recommendation or a status report stating when it expects to file a recommendation regarding the Request no later than December 6, 2019.

On October 25, 2018, the parties to File No. EO-2018-0211 filed a *Stipulation and Agreement* ("Cycle 3 Stipulation") resolving all issues in that case. On December 5, 2018, the Commission filed an *Order Approving Stipulation and Agreement and Granting Waivers*. The Cycle 3 Stipulation states on page 41 that, "The TRM and Deemed Savings Table are living documents that will be updated periodically throughout MEEIA 2019-21. Changes to the TRM will be submitted for Commission approval and will likely be a result of evaluations and/or the need to add additional measures." On November 15, 2019, Ameren Missouri filed updates to Appendix F (Deemed Savings Table) and Appendix I (TRM-Vol 3-Residential Measures) of the Cycle 3 Stipulation.

The proposed technical resource manual ("TRM") revisions in the Request are primarily based on: 1) incorporating the Evaluation, Measurement, and Verification ("EM&V") results for Ameren Missouri's MEEIA Cycle 2 program year 2018; 2) updating calculations with incremental cost input updates for central air conditioners and air source heat pumps, and 3) adding new multifamily low income measure options.

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STAFF RECOMMENDATION

Staff has reviewed the revisions to the TRM and Deemed Savings Table filed by Ameren Missouri and recommends the Commission approve Ameren Missouri's Request as filed on November 15, 2019.

Staff has verified that Ameren Missouri is current on its annual report filings and is not delinquent on any assessment. Staff is not aware of any other matter before the Commission that affects or is affected by this filing.

DEFORE 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 Furtherance of Energy)	File No. EO-2018-0211
Efficiency as Allowed by MEEIA)	

AFFIDAVIT OF MARK KIESLING

State of Missouri)
) ss
County of Cole)

COMES NOW Mark Kiesling, and on his oath declares that he is of sound mind and lawful age; that he contributed to the attached *Staff Recommendation* in memorandum form; and that the same is true and correct according to his best knowledge and belief.

Further the Affiant sayeth not.

JURAT

Subscribed and sworn before me, a duly constituted and authorized Notary Public, in and for the County of Cole, State of Missouri, at my office in Jefferson City, on this 516 day of December, 2019.

NOTARY PUBLIC

Trank Yesl X Mark Kiesling

DIANNA L. VAUGHT Notary Public - Notary Seal State of Missouri Commissioned for Cole County My Commission Expires: July 18, 2023 Commission Number: 15207377