

**Ameren Illinois Company**  
**Electric and Gas Energy Efficiency**  
**and Demand Response Plan**  
**2022 – 2025**



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## 1.0 Executive Summary

Ameren Illinois Company d/b/a Ameren Illinois ("Ameren Illinois," "AIC" or the "Company") submits to the Illinois Commerce Commission ("Commission") this modified energy efficiency and demand response plan for the four-year period commencing January 1, 2022, (the "2022 Plan" or "Plan") in accordance with Sections 8-103B and 8-104 of the Illinois Public Utilities Act, 220 ILCS 5/8-101 *et seq.* (the "Act").

The original 2022 Plan was the result of the collaborative efforts of the Company and other interested stakeholders who participate in the Illinois Stakeholder Advisory Group ("SAG") and the Illinois Low Income Energy Efficiency advisory committee for the South ("LIAC")<sup>1</sup>, which were undertaken over the months prior to its filing in March 2021. Since its passage, the Illinois Future Energy Jobs Act, Public Act 99-0906 ("FEJA") brought new opportunities to save energy and invest in Illinois, as well as challenges to balancing the achievement of cumulative persisting annual savings ("CPAS") with the other requirements, objectives and goals set forth in the Act. This 2022 Plan, as modified, was the result of the continued collaborative efforts of the Company, the Commission Staff and interested stakeholders in response to the enactment of Public Act 102-0662 on September 15, 2021, which, among other things, amended provisions of Section 8-103B. The 2022 Plan incorporates consensus changes to align it with the new and modified elements of Section 8-103B. The result of the development process yielded a Plan that balances these considerations to the benefit of Ameren Illinois customers while complying with the Act.

For example, Ameren Illinois developed a key set of objectives, sought input from a variety of interested stakeholders, including those that traditionally participated in the SAG and LIAC, and designed a robust portfolio of electric and gas energy efficiency programs aimed to achieve energy savings and advance the Company's efforts to meet the CPAS goals set forth in the Act for 2030. Additionally, the Company designed the portfolio with a continued focus on using the energy efficiency investments in a way that will achieve the additional, important objectives to have a positive community impact while amplifying other benefits to customers, like environmental impacts, achieved in tandem with energy savings. The Plan will do all this in a manner that also invests substantially in programs for low- and moderate-income customers.

As set forth below, each section of the 2022 Plan provides a narrative of the information in accordance with the requirements of the Act, as amended. For ease of reference and to streamline any updating of the budgets, savings goals and other information, Ameren Illinois provides the technical information in Appendices A-J, which are attached and incorporated into the Plan.

Ameren Illinois looks forward to implementing this Plan, as approved by the Commission, and providing customers with the benefits of the programs, initiatives and measures set forth herein.

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<sup>1</sup> While the LIAC participated in the development of the original 2022 Plan, which formed the basis of this 2022 Plan, Public Act 102-0662 changed the applicable provisions to Section 8-103B(c) to mandate the creation of a new Low-Income Energy Efficiency Advisory Committee ("LIEEAC") that replaces the LIAC.

## 2.0 Introduction

Section 8-103B and Section 8-104 of the Act require electric and gas utilities, respectively, to implement energy efficiency measures in order to meet the energy savings standards set forth in those sections of the Act. Ameren Illinois provides both electric and gas service to customers in its service territory, and therefore the Company presents a four-year integrated<sup>2</sup> energy efficiency and demand response plan designed to, during the 2022-2025 calendar years, reduce electric and gas energy usage and peak demand of residential and non-residential customers within the Ameren Illinois service territory.

### 2.1 Key Features of the Plan

This Plan represents Ameren Illinois' continued commitment to meeting both the electric and gas savings standards set forth in the Act through a portfolio of programs, initiatives and measures that enhances the value delivered to Ameren Illinois' customers. Ameren Illinois has worked with a large, diverse group of stakeholders to develop energy efficiency programs and initiatives that integrate new and innovative design concepts and delivery channels to reach a broad range of customer groups through a cost-effective energy efficiency plan. The Plan has been developed to balance the objectives of stakeholders, including the Company, meet statutory requirements, including those reflected in the applicable provisions of Public Act 102-0662, and provides for an ongoing process to continue to offer the best energy efficiency services to both residential and non-residential customers. The Plan is informed by, relies upon and incorporates the Energy Efficiency Policy Manual, Version 2.0 ("EE Policy Manual"), the Illinois Technical Reference Manual, Version 9.0 ("IL-TRM"), and the amended Settlement Stipulation and Agreement (the "2022 Stipulation") entered into with various non-financially interested stakeholders.<sup>3</sup>

The Plan comprises two programs: the Residential Program and the Business Program. Both programs feature multiple initiatives and market channels through which customers can participate in electric and gas energy efficiency. The Plan also funds investment in communities, while providing essential portfolio-level functions necessary to deliver energy efficiency to the Ameren Illinois service territory, including: Planning, Implementation and Administration; Outreach, Marketing and Communications; Tracking and Reporting, including but not limited to Evaluation, Measurement & Verification; Market Transformation; Risk Management; and Supplier Diversity and Inclusion.

The residential and business programs include a wide range of delivery strategies to provide all customers, except those Large Private Energy Customers who have opted-out of participation in the electric energy efficiency programs, in the Ameren Illinois service territory meaningful opportunities to participate in energy efficiency. The strategies target a diverse cross section of customers, including, but not limited to:

- Residential single family and multifamily homes/units;

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<sup>2</sup> Section 8-104(f)(6).

<sup>3</sup> For ease of reference, the EE Policy Manual version 2.0 can be found at: [https://ilsag.s3.amazonaws.com/IL\\_EE\\_Policy\\_Manual\\_Version\\_2.0\\_Final\\_9-19-19.pdf](https://ilsag.s3.amazonaws.com/IL_EE_Policy_Manual_Version_2.0_Final_9-19-19.pdf); the IL-TRM version 9.0 can be found at: <https://www.ilsag.info/technical-reference-manual/il-trm-version-9/>; and the 2022 Settlement Stipulation and Agreement can be found as Appendix J to this Plan.

- Low income and moderate income residential customers;
- Customers served by community based organizations and community action agencies;
- Large and small businesses;
- Public sector, including municipal corporations, as well as federal, state and local government;
- Public and private schools, including colleges, universities, community colleges and school districts;
- Customers in existing buildings;
- Owners, renters and landlords;
- Customers replacing equipment, as well as customers retrofitting or operating existing equipment;
- Customers interested in comprehensive solutions across multiple systems and buildings, as well as customers interested in more limited approaches targeting individual measures;
- Program Allies (trade allies and contractors) that install equipment directly in customer facilities and programs that encourage customers to work with these local trade allies for installations; and
- Programs that provide, in addition to financial incentives, education, energy assessments, design assistance, project management assistance, Program Ally network development; quality assurance, certification and other features to overcome efficiency market barriers.

## 2.2 Organization of the Plan

The following sections together outline the development process, planning assumptions and electric and gas integration strategies, which were all enhanced through collaboration with stakeholders:

- **Section 3** explains the Plan development process, which include the challenges and opportunities of meeting the requirements of the Act, as amended by Public Act 102-0662.
- **Section 4** provides the Plan objectives and outlines the residential and business programs.
- **Section 5** summarizes the process proposed for Evaluation, Measurement and Verification of the savings achieved by the Plan.
- **Section 6** describes the cost recovery mechanisms to be used, which are reflected in the various electric and gas tariff riders already on file with the Commission.

The Plan also includes Appendices that provide the technical details with respect to the budgets, goals, planned participation, cost-effectiveness, as well as documents supporting the Plan, including:

- **Appendix A**, which sets forth the electric planning budget by calendar year for each of the four years.
- **Appendix B**, which sets forth the 2022 Plan electric savings goals.

- **Appendix C**, which provides the electric demand response ("DR") goal by calendar year for each of the four years, as well as the planned demand reductions (MW).
- **Appendix D**, which provides the four year Plan gas planning budget.
- **Appendix E**, which sets forth the 2022 Plan gas savings goals.
- **Appendix F**, which provides a summary of both the electric and gas planning budgets and the 2022 Plan savings goals, as well as the results of the total resource costs test.
- **Appendix G**, which provides the adjustable goals template that Ameren Illinois proposes be used in the future to calculate modified gas goal adjustments as a result of the annual Illinois Technical Reference Manual (IL-TRM) and net to gross ("NTG") updates.
- **Appendix H**, which includes the program description templates for the Residential Program and the Business Program.
- **Appendix I**, which provides a list of the Measure Inputs by program and initiatives within those programs.
- **Appendix J**, which provides the 2022 Settlement Stipulation and Agreement entered into between the Company and the Staff of the Illinois Commerce Commission, the Office of the Illinois Attorney General, the Natural Resources Defense Council, Community Organizing and Family Issues, through their attorney, the National Consumer Law Center, the Citizens Utility Board, the Environmental Law & Policy Center, and Aces for Youth (the "2022 Stipulating Parties").

These Appendices provide a single place of reference for the Commission, the public and stakeholders. Native files can be provided upon request and execution of appropriate protections regarding information contained in the files. Ameren Illinois intends to make any updates, modifications or adjustments ordered or allowed by the Commission, to the applicable Appendices in the future, as appropriate.

## 3.0 Plan Development

The 2022 Plan has been developed in accordance with the provisions of the Act, as amended by Public Act 102-0662, and in collaboration with stakeholders with a variety of interests, including the 2022 Stipulating Parties.

### 3.1 Development Process

#### 3.1.1 Plan Development Knowledge and Expertise

To maintain consistency and success, Ameren Illinois continued to engage the services of the Applied Energy Group ("AEG") for the analysis and development of the Plan programs. AEG performed several past plan modeling, as well as completing the past three potential studies for the Ameren Illinois service territory and the work done to support the original 2022 Plan approved by the Commission. In addition to the assessment and modeling of Ameren Illinois' Plan, AEG has over thirty years of national and international experience on energy efficiency strategy and portfolio development. In particular, AEG has experience in Illinois due to previously

developing the utility portfolio plan filings for Peoples Gas and North Shore Gas, and performing the review and analysis of energy efficiency bid responses submitted on behalf of the Illinois Power Agency ("IPA") electricity procurement plan for years. AEG has also been actively participating in the SAG and the Technical Advisory Committee ("TAC") over the last several years. AEG's independent expertise provides additional integrity and legitimacy to the Plan modeling. AEG used their Ben-Cost modeling tool to provide state-of-the-art cost-effectiveness analysis of the individual measures. Multiple states throughout the country use the Ben-Cost modeling to assess cost-effectiveness.

2022 Plan development also relied on the continued support, guidance and planning and implementation experience of the Ameren Illinois Energy Efficiency Team, which includes the years of experience managing a cost-effective portfolio through prime and subprime implementers. The combined energy efficiency knowledge and expertise of this team provided an understanding of what it takes to develop and implement best in class, successful and innovative energy efficiency programs to difficult to reach market segments. Estimation of incentive levels, program administration and marketing costs, and portfolio level costs were based primarily on the actual field experience from prior plan implementation in the Ameren Illinois service territory and the expertise of the implementation teams.

The 2022 Plan has been further enhanced with involvement from participants from across the State, including the 2022 Stipulating Parties. SAG-facilitated development meetings for the 2022 Plan continued to occur prior to filing, and input was sought about Ameren Illinois' energy efficiency plans, goals and the requirements of energy efficiency. For the original 2022 Plan, Ameren Illinois engaged stakeholders beginning in January 2020, with a protracted discovery, discussion and negotiation process that was held over a series of months leading up to this filing. This process continued following the passage of Public Act 102-0662. Ameren Illinois also shared confidential information (e.g., 2022 Plan batch files and 2022 Plan inputs) with Commission Staff and several stakeholder parties who signed Non-Disclosure Agreements.

As part of the original 2022 Plan, and in addition to the various meetings and presentations to the large group SAG, Ameren Illinois met on numerous occasions with the LIAC, members of which represent Community Action Agencies ("CAAs") and Community Based Organizations ("CBOs") within the Ameren Illinois service territory. Committee members provided valuable input on portfolio priorities, as well as focus areas for program design that still remain a part of the 2022 Plan, as modified.

In conjunction with engaging non-financially interested stakeholders, Ameren Illinois also engaged financially interested stakeholders ("implementers"). Implementers were asked to propose plan concepts for consideration by Ameren Illinois in development of the plan. Ameren Illinois selected concepts identified as implementable, innovative program designs and approaches for consideration to be included in the Plan.

Ameren Illinois has been very appreciative of the ideas and exchange of information received from SAG, Staff, former LIAC participants, and implementer participants throughout the process and submits a Plan that not only meets the requirements of the Act, but does so in a manner consistent with recommendations made by the various interested parties. Additionally, the collaborative engagement with non-financially interested stakeholders resulted in the approval of the original 2022 Plan, as well as the 2022 Stipulation that provided certain elements agreed upon through negotiation to be a part of the 2022 Plan.

### **3.1.2 Additional Plan Development Resources**

The development of the Plan was also guided by several additional resources including the updated 2020 Ameren Illinois Demand Side Management ("DSM") market assessment and potential study, EE Policy Manual<sup>4</sup>, and the IL-TRM.<sup>5</sup> The 2020 DSM potential study began with market research and data collection within the Ameren Illinois service territory including a variety of supplemental secondary data sources as needed to allow for market characterization, specifically arriving at energy usage broken out by sector level electricity and gas use and available savings measures within each sector. Utilizing market characterization and load forecasting data, the potential study assumed adoption rates based on previous program accomplishments, ultimately arriving at achievable potential savings estimates for the 2022 Plan.

### **3.1.3 Plan Development Analysis**

The Ben-Cost is a Microsoft Excel<sup>®</sup>-based model that integrates technology-specific engineering and customer behavior data with utility market saturation data, load shapes, rate projections and marginal costs into an easily updated data management system. The model allows for efficient integration of large quantities of measure, building, and economic data to optimize DSM portfolios. Ben-Cost is currently being used by other Illinois utilities for DSM planning, in addition to dozens of utilities across the country.

Ameren Illinois used Illinois-specific inputs, past program experience, and evaluation results, where possible, in building the portfolio. The IL-TRM was used for all data inputs when appropriate and available. With stakeholder agreement, Version 9.0 of the IL-TRM was used for all measure savings, incremental costs, and lifetimes, where applicable. However, if data was not available in the IL-TRM for specific measures, a combination of industry sources, simulation modeling, and evaluation data was utilized for the Total Resource Cost ("TRC") analysis. For example, Business Custom projects are not included in the IL-TRM. To fill the data gap, data was provided by Leidos, Ameren Illinois' prime implementation contractor, which provided past program performance of custom projects that savings were based on. Additional measure level data was garnered from impact evaluations of programs in the field for past program years of the last approved Plan (the "2018 Plan"), as was consistent with the evaluation framework approved by the Commission for that plan. The Ameren

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<sup>4</sup> Illinois Energy Efficiency Policy Manual Version 2.0 was approved by the Commission in Docket 19-0983.

<sup>5</sup> The Illinois Statewide Technical Reference Manual for Energy Efficiency version 9.0 was approved by the Commission in Dockets 19-0983 (Policy Document Version 3.0) and 20-0741 (Technical Documents).

Illinois energy efficiency management and implementation teams, in addition to members or representatives of members of the SAG and their consultants, reviewed the results of this planning process in detail and their input and feedback helped refine the inputs used in building the portfolio.

As set forth herein, Ameren Illinois' integrated joint electric and gas utility energy efficiency Plan delivers a flexible portfolio capable of serving diverse market segments. Specifically, Ameren Illinois' integrated plan includes administrative and programmatic synergies for program delivery, increased energy benefits, more cost-effective measures, and operational benefits for trade allies in the field.

The dual-fuel integrated portfolio's single marketing vehicle encourages participation and program uptake, resulting in increased energy savings and streamlining administrative activities. As a result, increased energy savings can potentially increase the number of measures included and may also raise the cost-effectiveness of several dual-fuel measures.

## 3.2 Opportunities and Challenges

### 3.2.1 Ameren Illinois Service Territory Unique Attributes

As noted over the past several years to stakeholders participating in the SAG in Illinois and in past plan filings, the Ameren Illinois service territory (i.e., the green portion in the inset picture) is substantially different from the service territory in the northern portion of the State (i.e., the white/blue/orange portion). Ameren Illinois remains the only large investor-owned utility in Illinois that provides delivery service to both electric and gas customers subject to the energy efficiency standards set forth in the Act. The Company's service territory spans more than three-fourths of the State and encompasses a land area covering over 44,000 square miles, which is significantly larger than the other large electric-only and gas-only utilities in Illinois. In addition, the area does not have the large metropolitan areas of the upper third portion of the State, but is largely rural and made up of over 1,100 small towns and villages that are dotted throughout the territory with grain and livestock farms. Only two cities in the Ameren Illinois service territory have populations over 100,000 and in one of those towns (Springfield), Ameren Illinois serves only gas. In addition to its largely rural residential areas, the Illinois River runs through the length of the state and therefore is heavy with industrial customers. Accordingly, the provisions set forth in Section 8-103B(*l*), which provide an opt-out process for certain large private energy customers, continues to have a significant impact when implementing programs and achieving savings in the service territory.



Ameren Illinois also has to account for the unique circumstances involving the over twenty-five electric cooperatives or municipalities that are either adjacent to or overlap Ameren Illinois' service territory. (i.e., inset picture of the IL Electric Co-op map). This service territory attribute has been and remains a challenge to the Program Allies who cannot simply assume that all 1.2 million customers in the geographic Ameren Illinois service territory are Ameren Illinois electric customers.



### 3.2.2 Shift to Long Lasting Measures

As a utility providing both gas and electric service, Ameren Illinois must meet the energy savings requirements in both Section 8-103B (electric) and Section 8-104 (gas). Section 8-103B(g)(1) requires Ameren Illinois to demonstrate that its proposed electric energy efficiency measures will achieve the applicable requirements identified in Section 8-103B(b-15), as modified by Section 8-103B(b-20), (f) and (g), while also meeting the other objectives and goals of the Act. Section 8-103B(b-15) requires Ameren Illinois to achieve cumulative persisting annual savings ("CPAS") goals. Section 8-104(c) provides the gas saving standards, and also allows for satisfying compliance by meeting the annual incremental gas savings goal in the applicable year **or** by showing that total cumulative annual savings within the four year planning period are equal to the sum of each annual incremental savings requirement from the first day of the four year planning period through the last day of the multi-year planning period.

Lifetime savings are greater for measures with savings that persist for longer periods over measures with shorter lifetimes. The 2022 Plan significantly increases achieved savings that persist through the plan cycle with a very small amount of savings expiring during the plan implementation cycle. Longer lasting measures that achieve savings persisting through 2030 are significantly increased in the Plan, replacing measures with low persisting or expiring savings. These longer-lasting measures will also be a benefit to future electric energy savings plans required to be filed in and after 2025,<sup>6</sup> as some of the longer-lasting measures will provide savings in the out years of the future plan. Many of the longer-lasting savings are from measures installed in the low- to moderate-income residential customer homes through the Income Qualified Initiative, as well. One of the primary objectives of this Plan is the outreach and implementation of energy efficiency measures to customers in the low- to moderate-income groups, which are prevalent throughout the Ameren Illinois service territory in both rural and urban settings.

Accordingly, the 2022 Plan balances the achievement of the savings goals authorized by the Act, while delivering a portfolio that still meets the requirements and goals set by the General Assembly to ensure customers receive the benefits that energy efficiency has to offer.

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<sup>6</sup> Section 8-103B(f)(3)

### 3.2.3 AMI Integration

Ameren Illinois' Advanced Meter Infrastructure ("AMI") initiative will also be providing a potential opportunity during the implementation of the 2022 Plan.

Multiple options for integrating current and future AMI data into this 2022 Plan are under consideration.<sup>7</sup> One use for AMI data would likely be market analysis. Internal analysis of all data points would provide Ameren Illinois with insight into customer energy consumption and behavior patterns. This information may allow the Ameren Illinois marketing team to work with program management to target specific geographic areas or customer sectors. An ability to discover and market to a specific customer base of great need could be particularly beneficial in the expansive and diverse service territory of Ameren Illinois. One example of customer sector targeting would be the use of AMI data to pinpoint customers using electric resistance heat. Program marketing could utilize this data to market heat pumps to these customers, which could provide significant electric savings to the customer and portfolio.

In addition, there is potential to utilize third party program or software to integrate AMI data into a direct customer interaction. Ameren Illinois has begun using third party software (e.g., Power Take Off) to provide customers direct insight into electricity usage coupled with potential savings opportunities. Ameren Illinois will continue to investigate additional integration methods for AMI data in the Ameren Illinois service territory. Accordingly, the implementation flexibility requested by Ameren Illinois will be critical to giving the Company the best opportunity to leverage the added infrastructure during Plan implementation.

### 3.2.4 Electric Opt-out and Exempt Gas Customers

#### Electric

Section 8-103B(l) allows certain Eligible Large Private Customers (whose total highest 15-minute demand was more than 10,000 kilowatts in any of the 12 consecutive Billing Periods prior to the start of the first year of the 2022 Plan) to opt-out from participating in or paying for the electric energy efficiency programs ("Opt-out Customers"<sup>8</sup>). Savings provided by large customers who may have participated in

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<sup>7</sup> Section 8-103B(i)

<sup>8</sup> Opt-out Customer definition is included in Ameren Illinois Electric Service Schedule Customer Terms and Conditions as follows:

Opt Out Customer means Retail Customers that have opted out from energy efficiency and demand response programs whose highest 15-minute demand was more than 10,000 kilowatts in any of the 12 consecutive Billing Periods prior to the start of the first year of each energy efficiency multi-year plan approved pursuant to 220 ILCS 5/8-103B. For a business entity with multiple sites located in the State, where at least one of the sites qualifies as an Opt Out Customer, then any of that business entity's sites, properly identified on a form for notice, shall be considered Opt Out Customers.

Upon receipt of a properly and timely noticed request for Opt Out submitted by an eligible Opt Out Customer, the Company shall grant the request, file the request with the Commission, and apply the opt out designation beginning with the January Billing Period that coincides with the start of a new energy efficiency multi-year plan.

Notwithstanding the above, any Customer who submits a properly noticed request after December 31, 2021 but

prior energy efficiency plans were achieved at relatively lower cost than from either residential or the small to medium size non-residential customers. Furthermore, large amounts of the savings were able to be provided by a relatively smaller number of customers; therefore, savings without Opt-Out Customers requires more coordination with a much higher number of customers. Moreover, in order to obtain higher participation from those large customers that do not opt-out, or from those who cannot opt out like federal, State, municipal and other public customers or those small to medium-size non-residential customers, customers that have not traditionally participated in Ameren Illinois' programs at a higher level, incentives have been increased to cover a larger portion of the incremental cost.

### Gas

As noted in subsequent Section 3.8, Section 8-104(n) exempts certain large customers from participating in or paying for energy efficiency programs.

### **3.2.5 Past Successes**

Ameren Illinois electric energy efficiency programs began in June 2008 while gas energy efficiency programs began in January 2009. Since Ameren Illinois energy efficiency programs began, Ameren Illinois has consistently been successful in achieving energy efficiency and demand response savings for customers that have been cost effective and with additional benefits to the communities in which they live and work. This Plan will continue to build on that tradition of successful program delivery and achievement of meaningful energy savings for customers.

### **3.2.6 Increase in Low and Moderate-Income Participation**

Increasing low- and moderate-income participation remains a key attribute of Ameren Illinois' dedication to its residential customers. Low income customers are frequently at increased risk of financial hardship due to increases in their energy costs—particularly in light of the recent Covid-19 pandemic—as well as other market conditions, and often have limited discretionary income to invest in energy efficiency

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before January 28, 2022 shall be considered an Opt Out Customer beginning with the January 2023 Billing Period, and remain an Opt Out Customer for the remainder of the 2022-2025 energy efficiency plan.

If a Customer who is an Opt Out Customer changes ownership, the Company, in conjunction with the new legal owner, shall determine if such Customer meets the requirements to continue to be an Opt Out Customer. Upon change of ownership, if Customer's operation is discontinued or substantially altered such that the highest 15-minute demand is not expected to exceed 10,000 kW, Company may at its sole discretion, remove Customer from Opt Out Customer status.

A Customer, or Customer at a new Premises, that did not have a 15-minute demand in any of the 12 consecutive Billing Periods prior to the start of the first year of each energy efficiency multi-year plan shall not become an Opt Out Customer within the current multi-year plan if such Customer subsequently experiences a 15-minute demand greater than 10,000 kW.

improvements. In many cases, the homes that low- and moderate-income customers reside in were built before the implementation of uniform energy efficiency code, and have the potential to achieve substantial energy savings. However, many of these homes will need significant investment in home repairs and other health and safety improvements before energy saving measures can be installed. A continued comprehensive home weatherization program that provides services at little or no cost to low- and moderate-income customers is needed to tap this energy savings opportunity. In addition, dedicated funding towards health and safety costs associated with energy savings measures will help improve opportunities for customers who need the programs the most.

Ramping up production capacity to achieve Ameren Illinois' Income Qualified ("IQ") Initiative goals will require a concerted effort and investment to build capacity among community action agencies and within the private sector. This effort, which will be targeted primarily to local organizations, also presents an opportunity to stimulate local economies, creating jobs and developing expertise within the workforce to support the present and future successes of the IQ Initiative.

### **3.2.7 Electrification for Low- and Moderate-Income Propane Users**

The passage of Public Act 102-0662 provides opportunities to increase participation by business and residential customers through promotion and cost recovery of measures that electrify end uses. Ameren Illinois will target electrification efforts towards low- and moderate-income homes and multifamily buildings using propane as their heating and/or water heating source. The effort will pursue opportunities that reduce total energy costs and maximize bill savings by replacing certain propane fired equipment with electric powered measures.

## **3.3 Electric Planning Budgets**

Appendix A provides the planning budgets set forth in Section 8-103B(f), (g) and (m) for the 2022 Plan.<sup>9</sup>

The electric planning budgets for each year of the Plan, beginning January 1, 2022, is limited to 4.00% of the average amount paid per kilowatthour (kWh) by residential eligible retail customers during calendar year 2015,<sup>10</sup> multiplied by the Ameren Illinois actual sales for the calendar year 2015 to eligible customers who did not opt-out. The process for customers to request opting-out of energy efficiency plans prior to each plan cycle is outlined in 8-103B(l). The process allows eligible large private energy customers to submit a Commission issued application form for the utility to review. Ameren Illinois was responsible for reviewing applications received, determining customer eligibility, granting requests that were properly completed and timely, and filing granted requests with the Commission. Guidance from Commission Staff was sought during the review process as needed. Eligible large private energy customer requests submitted by December 31, 2021,

<sup>9</sup> Appendix A also provides the planned portfolio breakdown of the budget, which is subject to change during implementation.

<sup>10</sup> Section 8-103B(m)

were reviewed, with those granted considered as Opt-Out Customers for the period from 2022-2025. Eligible large private energy customer requests submitted between January 1, 2022 and January 28, 2022 were reviewed, with those granted considered Opt-Out customers for the period from 2023-2025. As allowed under Section 8-103B(l), eligible large private energy customers were also allowed to opt-out of participation for other business entity sites properly identified on their request form. The load associated with serving the Opt-Out Customers that were granted as part of this process was incorporated into the plan budget calculations. See Appendix A for the electric plan year budgets, which are subject to the flexibility provisions set forth in Section 8-103B(m).

### **3.4 Electric Savings Goals**

The electric savings goals are calculated pursuant to Sections 8-103B(b-15), (b-20), (f), (g) and (m). Section 8-103B(b-15) of the Act sets forth the energy efficiency goals for applicable utilities based on CPAS. CPAS represent the cumulative savings from energy efficiency measures installed from previous years and measures installed in the applicable year less any expired savings during that year. These statutory CPAS goals for Ameren Illinois are laid out in Section 8-103B(b-15), as modified by subsections (b-20) and (f). These goals are expressed in percentages and are to be applied to the deemed baseline sales for 2014, 2015, and 2016 of 36,900,000 MWhs less the average annual consumption during the same time period for those customers that have opted out based on Section 8-103B(l). The opt-out request submittal process set forth in section 3.3 above also impacted the savings goals, and result in 2022 electric savings goals that differ from those in 2023-2025. Section 8-103B also identifies situations that would require modification of CPAS goals. In accordance with the Plan development process, including the 2022 Stipulation, the 2022 Plan reflects modification to the CPAS goals in light of budgetary limitations, as well as compliance with other requirements, objectives and goals of the Act, such as ensuring equitable access by customers to efficiency opportunities and enhancing the diversity of providers of efficiency products and services in Ameren's service territory.

In addition to CPAS goals, Section 8-103B sets forth an Applicable Annual Incremental Goal ("AAIG"), which is used to calculate the Company's energy efficiency formula rate. The AAIG is determined by taking the cumulative persisting annual savings for an applicable year and subtracting the preceding year's cumulative persisting annual savings target. The AAIG for the 2022 Plan years are unmodified.

Please see Appendix B for the calculation of Ameren Illinois electric CPAS goals and AAIG for the 2022 Plan.

### **3.5 Demand Response Savings**

Appendix C provides the electric demand response ("DR") goal by calendar year for each of the four years, as well as the 2022 Plan DR reductions (MW). Ameren Illinois must reduce peak demand by 0.1% over the prior year for eligible retail customers and for customers that elect hourly service from the utility.<sup>11</sup> As previously approved by the Commission for the past three plans, and in accordance with the Plan development process,

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<sup>11</sup> Section 8-104B(g)(4.5)

including the 2022 Stipulation, Ameren Illinois will meet the demand response reductions through the coincident peak electric energy efficiency savings of this Plan.

### **3.6 Gas Budget**

Appendix D provides the gas planning budgets set forth in Section 8-104(d) for the 2022 Plan.<sup>12</sup>

Section 8-104(d) of the Act identifies a limit on the amount of gas energy efficiency measures that can be implemented under that Section of the Act. This provision serves "to limit the estimated average increase in the amounts paid by retail customers in connection with natural gas service to no more than 2% in the applicable multi-year reporting period." The budget is calculated by multiplying estimated Retail Revenue (amounts paid by retail customers as set forth in the Company's Rider GER) by this 2% limit.

### **3.7 Gas Savings Goals**

Appendix E provides the four-year Plan gas savings goals. Per Section 8-104(c), as modified by subsection (d), the gas savings goals are applied to the qualified sales (excluding certain sales under the Act) for the base calendar year 2009.

Considerations were made in the planning process as they relate to the provisions in Section 8-104(n) of the Act, which states "[t]he applicability of this Section to customers described in subsection (m) of this Section is conditioned on the existence of the SDC program. In no event will any provision of this Section apply to such customers after January 1, 2020." This provision reflects the fact that beginning January 1, 2020, gas customers meeting the eligibility requirements of Section 8-104(m) have not been eligible for gas energy efficiency programs.

### **3.8 Electric and Gas Integration**

Ameren Illinois provides both electric and gas service to its customers and therefore is required to comply with the energy efficiency standards set forth in Sections 8-103B and 8-104 of the Act. Ameren Illinois remains committed to developing and implementing energy savings programs ensuring cost sharing across portfolios, minimizing Program Ally and customer confusion, and providing the best possible opportunity for customers to achieve energy savings. All customers receiving both electric and gas delivery service from Ameren Illinois, residential and non-residential (commercial and industrial), receive the same message about the many opportunities to reduce both their electric and gas energy usage, including through on-bill financing options, which reduces confusion to all customers. In addition, Program Allies, the front-line providers of the energy efficiency programs offered by Ameren Illinois, can deliver one unified message to the customers they are working with and encouraging installation of energy efficient measures. Both the customers and the Program Allies only have to complete one application and marketing of both gas and electric savings opportunities can be provided at one website. In addition, the direct installation of energy efficient measures can be provided for both electric and gas, as applicable to the customer's eligibility. In areas within Ameren Illinois service territory

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<sup>12</sup> Appendix D also provides the planned portfolio breakdown of the budget, which is subject to change during implementation.

where customers receive electric service from Ameren Illinois and gas service from Nicor Gas, Ameren Illinois will continue efforts to coordinate delivery of joint electric and gas programs, including delivery of whole building retrofit IQ measures.

### **3.9 Funding Requirements and Allocations**

Ameren Illinois has several funding requirements that are integrated into the portfolio. Some of the requirements are specific to electric or gas only, sometimes with differences (e.g., public sector in Section 8-103B(c) for electric and Section 8-104(e-5) for gas).

#### **3.9.1 Low Income**

One of the requirements for Ameren Illinois in this Plan is the funding and implementation of low income programs for both electric<sup>13</sup> and gas.<sup>14</sup> For electric, the low-income households are defined as households at or below 80% of area median income and expenditures to implement the measures shall be no less than \$13.0 million per year. For gas, Ameren Illinois shall present a plan of energy efficiency measures proportionate to the share of total annual utility revenues in Illinois from households at or below 150% of the poverty level; such programs shall be targeted to households with incomes at or below 80% of area median income.

As noted in Appendices A, H and J, for electric and gas respectively, Ameren Illinois plans to exceed the minimum low income electric requirement by nearly 188% and a plan budget to exceed the minimum low income gas requirement by over 300% through implementation of measures delivered through the Income Qualified Initiative. Moreover, as reflected in the 2022 Stipulation, the term "low-income customers" during implementation will be defined as household income at or below 200% Federal Poverty Level ("FPL") or at or below 80% Area Median Income ("AMI"), whichever is least restrictive in terms of customer eligibility. The Company also incorporates other funding commitments as set forth in Appendix J, including with respect to the newly-authorized Low-Income Energy Efficiency Advisory Committee ("LIEAAC").

#### **3.9.2 Public Sector and Public Housing**

The Act also requires a minimum of 10% of Ameren Illinois entire gas portfolio and 7% of Ameren Illinois' entire electric portfolio funding each year to procure cost-effective energy efficiency from the public sector which includes units of local government, municipal corporations, school districts, and community college districts. Public housing is also included in the 7% of electric portfolio funding but is not included in the 10% of gas portfolio funding. However, the Act requires a minimum percentage of available funds be used to procure electric energy efficiency from public housing equal to public housing's share of public building energy consumption. Ameren Illinois has worked with its development team to determine innovative ways to meet this requirement. Using the Commission approved flexibility the Company will work with the identified groups to procure the required cost-effective energy

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<sup>13</sup> Section 8-103B(c)

<sup>14</sup> Section 8-104(e-5)

efficiency, and track compliance with these public sector and public housing requirements through the four years.

### **3.9.3 Third Party Electric Energy Efficiency Program**

The Act requires Ameren Illinois to fund an electric third-party energy efficiency program (or programs) annually at a minimum of \$8.35 million.<sup>15</sup> In accordance with the Act, Ameren Illinois must conduct a solicitation process, propose bidder qualifications, performance measurement process, contract structure, and retain an independent third-party evaluator to score the proposals.

Ameren Illinois received approval from the Commission, as part of its original 2022 Plan approval, to meet the requirements of this third-party electric program in Section 8-103B(g)(4) through the bidding of programs that deliver innovative cost-effective savings/measures, to market rate customers, Income Qualified and previously underserved sectors, markets, and/or geographic regions, and with new or emerging technologies in an amount that is no less than \$8.35 million per year. For the solicitation process, Ameren Illinois employed a process similar to the third-party solicitation process used for the 2018 Plan and in accordance with the original Stipulation, and engaged a third party to administer the solicitation process with the same criteria, including level of expertise, that Ameren Illinois has employed when contracting with other third party energy efficiency providers in the Ameren Illinois service territory. As for the sectors, technology or geographical areas, Ameren Illinois specifically solicited bids for the programs listed in the table below and will also request a focus on delivering new program concepts for planned initiatives including but not limited to some of those which are currently categorized in the 2022 Plan as breakthrough equipment and devices/R&D (but not the Market Development Initiative).

As noted, Ameren Illinois commenced the third-party solicitation process in 2021 for the electric programs identified in the table below. Some third-party programs were identified as Breakthrough Equipment and Devices (BED) or research and development. Subsequently, after enactment of Public Act 102-0662 a utility filing for modified annual energy savings goals shall forgo spending portfolio dollars on research and development proposals.<sup>16</sup> Accordingly, and consistent with the 2022 Stipulation, certain activities and initiatives previously identified as BED were re-evaluated and reclassified as non-research and development to allow their continuation within existing programs/initiatives.

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<sup>15</sup> Section 8-103B(g)(4)

<sup>16</sup> Section 8-103B(h)

Program/Initiative/Channel	Program Sector	Technology Identified	Geographic Area Identified
One Stop Shop for Homeless Facilities	Business & Residential	Comprehensive retrofits including business and residential measures.	Entire service territory
Midstream HVAC	Business	Heat pumps, central air conditioners, boilers, refrigeration	Entire service territory
Midstream Lighting	Business	LED bulbs and fixtures, linear LEDs	Entire service territory
Midstream HVAC	Residential	heat pumps, central air conditioning, gas furnaces, hot water heaters	Entire service territory
Direct Distribution Efficient Products-School Kits	Residential	LEDs, advanced power strips, low flow showerheads, faucet aerators	Entire service territory. Targeted schools will be those in which 30% or more of the students are receiving free or reduced lunch.
Income Qualified - Community Kits	Residential	LEDs, advanced power strips, low flow showerheads, faucet aerators	Entire service territory. Targeting underserved communities with the most in-need customers
Income Qualified-Smart Savers	Residential	Advanced thermostats	Zip codes with higher propensities of IQ customers as identified from census data
Manufactured Homes Weatherization and Air Sealing Program	Residential	Air sealing, duct insulation and sealing, pipe insulation, heat pumps, advanced power strips, advanced thermostats, LEDs, low flow showerheads, faucet aerators	Entire service territory. Parks tend to be located around the following population centers: Springfield, Danville, Peoria, Bloomington, Champaign, Decatur, Edwardsville,

			Belleville, Carbondale, and other larger cities
Smart Home Engagement	Residential	Smart LEDs, smart hub thermostat, smart plug, smart smoke/co detector, pipe insulation, advanced power strips, hotspot and bridge (optional), portable solar charger, faucet aerators, low flow showerhead, door sweep, outlet gaskets	Entire service territory
Advanced Thermostats with TOU	Residential	Advanced thermostats	Entire service territory

### 3.9.4 Market Transformation

Ameren Illinois defines market transformation as the strategic process of intervening in a market to create lasting change in market behavior by removing identified barriers or exploiting opportunities to accelerate the adoption of cost-effective energy efficiency as a matter of standard practice. The intent is to transform markets, meaning changes in the market structure or function, so that efficient products, services, and practices are adopted within specific target markets on an accelerated, sustained and permanent basis. The Act provides that utilities may allocate five percent of the entire gas portfolio of cost-effective energy efficiency measures to local government and municipal corporations for market transformation initiatives, though electric utilities can fund market transformation initiatives as well.<sup>17</sup>

Ameren Illinois' market transformation activities may be focused towards both electric and gas energy efficiency to all customers.

Ameren Illinois will use its Commission-approved flexibility to identify the optimal activities, but at this time the Company anticipates considering funding the following market transformation initiatives that will, among other measures, support customers' investment in products whose efficiency exceed existing building and appliance standards and which could ultimately lead to implementation of new building and appliance standards: Energy Star Retail Products Platform, and Luminaire Level Lighting Controls. Ameren Illinois will also assess the feasibility of a Triple-Glazed Windows market transformation initiative as well as an initiative that would promote the adoption of efficiency performance standards for existing buildings in one or more municipalities in its electric service territory through existing statewide efforts underway through the Midwest Energy Efficiency Alliance ("MEEA") and Slipstream.

<sup>17</sup> Section 8-104(e-5)

If the initiatives align with Ameren Illinois' implementation priorities and the initiative moves forward, the Company will coordinate with stakeholders through the statewide Market Transformation working group related to this market transformation effort.

### **3.9.5 Electric Funding for Gas Programs**

Section 8-103B(b-25) allows for electric utilities to convert savings associated with other fuels into electric energy savings on an equivalent Btu basis, subject to certain conditions, including through the offering a gas energy efficiency measure in the event the gas funds are exhausted whereby the electric utility may recover the costs of offering the gas energy efficiency measure with electric funds. The Act also allows for the counting of fuels other than electricity when funded solely through the electric budget. These gas savings may also be converted to electric savings and counted toward the electric goals but savings counted towards the Applicable Annual Incremental Savings (AAIS) shall not to exceed 10% of that goal. Ameren Illinois will continue to convert savings associated with other fuels, including gas savings, to achieve Cumulative Persisting Annual Savings and will adhere to the limit prescribed by the statute when counting such savings towards the AAIS.

## **3.10 Portfolio Design**

As explained herein, the 2022 Plan builds upon the already Commission-approved plan, which was designed to meet several key portfolio objectives formed around compliance with the electric and gas energy efficiency statutory requirements while assisting residential and non-residential customers in reducing their electric and gas energy usage through the initiatives outlined in the residential and business programs.

### **3.10.1 Plan/Portfolio Objectives**

Ameren Illinois will seek to offer a robust portfolio of electric and natural gas measures, as well as voltage optimization measures<sup>18</sup>, to a diverse cross-section of the Company's customers that will also reduce peak demand. The portfolio will do this in a manner that achieves energy savings while investing substantially in programs for the moderate and low income customer sectors within portfolio budgetary constraints provided for in the Act. The portfolio will also invest in new technologies and delivery mechanisms, when applicable, while continuing to focus on increasing the diversity of suppliers and vendors. This approach aims to reduce implementation costs and continue the commitment of Ameren Illinois to provide best in class energy efficiency programs. Additionally, Ameren Illinois considered the following objectives when designing the portfolio of programs:

- Focus on including measures with measure lives extending at least to 2030 or beyond in order to improve the Company's performance toward the 2030 CPAS target from the Act.

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<sup>18</sup> Section 8-103B(b-20)

- Discontinue or scaling back measures with low persisting or expiring savings
- Incorporate efforts that allow the portfolio to contribute positive impacts for communities in Central and Southern Illinois, with innovative low income and public sector initiatives, as well as market transformation initiatives, in furtherance of statutory savings requirements;
- Leverage current programs and expanding successful implementation activities while maintaining program delivery momentum;
- Maintain a diverse portfolio of initiatives under the residential and business programs serving all customer classes with a focus on transforming methods of delivering energy efficiency programs to underserved residential low- and moderate- income communities;
- Increase efforts to use diverse suppliers and contractors and assist economically challenged communities to increase participation in receiving and delivering energy efficiency offerings; and
- Provide for an appropriate level of flexibility to manage the risks and uncertainties of the market, its primary objectives and the unique circumstances of the Ameren Illinois service territory.

The 2022 Plan also complies with the Act with a portfolio that achieves several objectives including:

- Delivery of an overall cost-effective portfolio of Energy Efficiency and Demand Response Measures using the Total Resource Cost Test;
- Achievement of statutory objectives and Commission approved savings goals;
- Delivery of Programs that represent a diverse cross-section of opportunities for customers of all rate classes to participate in the Programs;
- On a prospective basis, Portfolios should have a TRC greater than 1.0;
- Delivery of Programs targeted toward Low Income Customers, which do not have to be Cost-Effective; and
- Evaluation of Programs using consistent evaluation criteria.

### **3.11 Portfolio Elements**

Two programs comprise the 2022 Plan: the Residential Program and the Business Program. Both programs feature opportunities for customer participation through the initiatives outlined in the program description templates included as Appendix H. A key Plan objective is to offer customers a broad suite of options to meet their energy management needs, rather than forcing customers to sort through a variety of individual programs.

Various market factors including but not limited to current events, new codes and standards, energy legislation, and consumer attitudinal shifts will affect the measure mix and program delivery strategy over time. Ameren Illinois could also alter incentive levels and measure participation as necessary to ensure program success through achievement of energy savings goals. Subject to the Commission approved flexibility to appropriately respond to the market, the Programs are designed to run through the duration of the 2022 Plan period.

### 3.11.1 Residential Program

The Residential Program is comprised of six core initiatives that address key electric and natural gas end-uses in single family homes and multifamily properties, providing incentives and services to residential customers. It offers a range of educational opportunities and incentives for customers to implement a series of energy efficiency improvements. Comprehensive weatherization services, targeted primarily to low- and to moderate-income<sup>19</sup> customers, are designed to achieve reductions in energy consumption within a participant's home or property. Included as part of the comprehensive building approach, the Program also addresses health and safety issues, budget permitting. Each initiative is a potential entry point for customers into the Program, which is structured to facilitate cross-promotion between initiatives. The structure of the Residential Program is illustrated in Figure 1. Estimated budget and participation, target savings, collaboration, delivery, marketing and targeting strategies, eligible measures and cost/energy saved for the six initiatives are included in the program description template included as Appendix H.

Figure 1: Residential Program Initiatives

Retail Products	Income Qualified	Public Housing
Market Rate Single Family	Direct Distribution Efficient Products	Market Rate Multifamily

### 3.11.2 Business Program

The Business Program is comprised of six core initiatives that provide incentives and services to non-residential customers, excluding Opt-Out Customers and self-direct customers, to achieve electric and natural gas energy savings. A cornerstone to the Program is providing financial incentives to both private and public sector customers to drive them to identify and complete energy efficiency projects and reduce their

<sup>19</sup> Moderate income customers are those whose incomes are greater than both 200% Federal Poverty Level and 80% Area Median Income up to 300% Federal Poverty Level.

energy usage. Other aspects include education and training for customers and market professionals, energy efficiency marketing, and advancement of energy management, monitoring and building control systems beyond standard industry practices. The structure of the Business Program is illustrated in Figure 2. Estimated budget and participation, target savings, collaboration, delivery, marketing and targeting strategies, eligible measures and cost/energy saved for the six initiatives are included in the program description template as Appendix H.

**Figure 2: Business Program Initiatives**

Standard	Custom	Retro-Commissioning	Streetlighting	Midstream	Small Business
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### **3.12 Portfolio Management and Cross-Functional Portfolio Activities**

Portfolio Management consists of several key activities required to properly manage the portfolio. These elements include Planning, Implementation and Administration; Outreach, Marketing and Communications; Tracking and Reporting; Market Transformation; Risk Management; Supplier Diversity and Inclusion; evaluation measurement and verification; and the process of updating the Plan. These elements are considered portfolio-level costs because they provide services across the entire portfolio. As a utility that provides both gas and electric service, these activities are managed across both electric and gas energy efficiency portfolio.

#### **3.12.1 Planning, Implementation and Administration**

The planning, implementation and administration activities include a myriad of activities. The development and execution of Ameren Illinois' portfolio strategy utilizing both external coordination to communicate the portfolio and programs strategy and progress to the Commission and the SAG, and internal coordination to ensure use of consistent messaging and to provide general oversight of the planning and implementation process. Additional activities include the continued analysis of the Ameren Illinois portfolio, programs and budgets as well as the management of electric and gas rider reconciliations and dockets. Vendor/implementation contracting and payment processing is yet another key activity. Other key activities include managing the process of the SAG and/or Commission-led activities such as the Technical Reference Manual, the Energy Efficiency Policy Manual, On Bill Financing, Working Group participation (Non energy impacts, Market Transformation Savings, etc.), LIEEAC and energy efficiency installer certifications. Notably, in accordance with the Commission's Order in ICC Docket No. 19-0632, in calendar year 2020 the Company started tracking EE-related employee costs, which the Company will start recovering through its Rider EE beginning with the 2021 EE formula rate update and reconciliation.

### 3.12.2 Outreach, Marketing and Communications

Outreach, marketing and communications will continue to be an important and vital mechanism to educate and raise awareness about the value and benefits of energy efficiency to customers and for ensuring customers and Program Allies are aware of and participate in the portfolio programs.

The Company's efforts will build upon prior successes. Since 2018 the Ameren Illinois Energy Efficiency Portfolio has been the recipient of numerous awards recognizing it for innovation and leadership within the field of energy efficiency. The Ameren Illinois Market Development Initiative was recognized nationally by the Association of Energy Service Professionals for Outstanding Achievement in Customer Engagement. At a regional level, Ameren Illinois Portfolio has been recognized multiple times through the Midwest Energy Efficiency Alliance - Inspiring Efficiency Awards for its commitments to education through scholarships and internships, for marketing and impact through its Home Efficiency Income Qualified offering, and recognition of Ameren Leadership commitment to energy efficiency for all of its customers. Ameren's leadership was also recognized as Regional Energy Innovator of the Year by The Association of Energy Engineers. These award recognitions by several renowned professional groups demonstrate Ameren Illinois' ongoing commitment to provide best in class energy efficiency programs.

The Ameren Illinois energy efficiency team will continue to speak at numerous peer conferences and gathering; and will continue to engage with national and international organization to help lead our industry, benchmark our activity and advance the overall goals of energy efficiency.

Utilizing the recognized Ameren Illinois brand, the program has developed a number of award-winning campaigns and initiatives that encourage customers to "take action" to reduce energy consumption. The Ameren Illinois brand has also strengthened the co-marketing efforts for participating Program Allies.

Campaign activities include:

- An Ameren Illinois portal for Program Ally participation and provides up-to-date online access to information, instructions, applications, etc. for program participation. The website also provides energy-saving tips, portfolio program offerings, Program Ally search portals, incentive applications and more.
- Print advertising, digital media, direct mail, and email blast communications
- Press releases resulting in newspaper and television news stories.
- Brochures and literature.
- Conference and special event exhibits.

- Outreach events, sponsorships, educational seminars, and speaking engagements.
- Routine webinars, email communications, e-newsletters, round tables and customizable marketing materials for Program Allies.

### **3.12.3 Tracking and Reporting**

Instrumental to the success of the Ameren Illinois portfolio is the management of program tracking and reporting. Proper management ensures program implementers, as well as internal staff, consistently have access to accurate, reliable tracking data. Ameren Illinois and its implementers utilize a variety of tools for tracking and managing program data. The tracking and reporting structures will continue to evolve as needs require.

### **3.12.4 Research, Development and Breakthrough Equipment & Devices ("BED")<sup>20</sup>**

Numerous innovations in energy efficiency-related technologies are on the horizon, and many new, innovative products and services are becoming available. Ameren Illinois seeks to assist our customers with using these new products and services to efficiently manage their energy usage, as well as continue to develop the energy efficiency market in its service territory. Ameren Illinois believes that the investment in new energy efficiency concepts is critical to the future success of the energy efficiency portfolio. The Company has adjusted its spending activities to reflect the provisions of the 2022 Stipulation, including with respect to limiting its investment in electric research and development activities, it will nonetheless continue to explore these topics for potential future application through appropriate channels.<sup>21</sup>

### **3.12.5 Market Development Initiative**

In 2018 Ameren Illinois began to implement its Market Development Initiative ("MDI"). The MDI is a targeted effort identified and implemented to identify ways that the Ameren Illinois can greatly increase the positive impact that its energy efficiency programs have on communities in central and southern Illinois. This MDI effort is meant to target resources for activities that advance objectives beyond energy savings while at the same time advancing opportunities in markets and with local and diverse market actors that have been previously less engaged.

Into the next cycle, spanning 2022-2025, Ameren Illinois will continue to build on the successes of its MDI and enhance its efforts to increase its positive impact on communities. The MDI budget, included with Appendix A, will be 3% of the total electric planning budget, on an average annual basis, during the four-year plan and the funding will support a variety of program activity further defined below. Ameren

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<sup>20</sup> As explained in Section 1 of the EE Policy Manual, BED activities include research and development activities as authorized by both Sections 8-103B and 8-104.

<sup>21</sup> See Section 8-103B(h); Section 8-104(g).

Illinois will build upon one of its key MDI strategies which has been to leverage partnerships with community based organizations to allow these organizations to speak as a trusted voice to customers in need that are often their clients. In addition to partnering with community based organizations, the MDI also includes extensive efforts to engage local and diverse contractors, job seekers and also local businesses and diverse businesses to introduce them to opportunities in the energy efficiency economy.

Since 2018<sup>22</sup>, the MDI has been funded with a portion of the Company's BED budget, which it will continue to do. For Program Years (PY) 2022-2025, the Company will continue to focus on three core MDI objectives as outlined below:

1. Engage underserved customers and communities: Deliver targeted energy efficiency education and data-driven, neighborhood-based program approaches to serve communities with a critical need to reduce energy usage.
2. Build a diverse workforce: Increase the number of local and diverse participants in the energy efficiency workforce and help develop the next generation of clean energy economy jobs.
3. Support diverse businesses: Strengthen the partnership and support for local and diverse business enterprises, including a focus on capacity building for community-based organizations and trade allies/EE service providers.

**MDI Implementation:** In order to achieve the objectives of the MDI, Ameren will enhance and continue the following efforts and initiatives, many of which are intended to overlap in serving multiple MDI objectives, the Company will also incorporate new efforts when they are identified and if they will serve one or more of the MDI objectives:

1. Engage underserved customers and communities:
  - a. Staffing grants
  - b. Equipment grants
  - c. Neighborhood campaigns
  - d. Technical assistance provided to community-based organizations, including non-profits and community action agencies
  - e. Delivery of measures at the community level<sup>23</sup>
  - f. Marketing support and resources
  - g. Partnering with organizations to leverage additional funding sources
2. Build a diverse workforce
  - a. Internships

<sup>22</sup> In accordance with the Final Order of the Illinois Commerce Commission (ICC) issued Docket No. 17-0311.

<sup>23</sup> Generally speaking, the installation of efficiency measures will be funded through the Income Qualified initiative. However, there may occasionally be circumstances in which that is not feasible or practical and measures installed by community-based organizations through special projects are instead funded through the MDI budget. In no event will more than 10% of an annual MDI budget be used for such purposes.

- b. Scholarships
  - c. Workforce Development Research
  - d. Workforce Development Pipeline Efforts
3. Support local, and diverse businesses
- a. Portfolio-wide Diverse Vendor Procurement
  - b. Diverse Vendor Database
  - c. Diverse Vendor Surveys
  - d. Income Qualified Customer Focus Groups
  - e. Staffing Grants
  - f. Equipment Grants
  - g. Technical and back-office support
  - h. Funding for training
  - i. Assistance identifying additional funding sources

The MDI will be comprised of projects and partnerships listed above, all working together to engage customers and businesses who have not previously benefited from energy efficiency, as well as any new activities identified during implementation that will serve the goals and objectives of the MDI. Each year, Ameren Illinois creates a Market Development Action Plan (MDAP), which helps to translate the MDI objectives into specific program campaigns, activities, and market research. The MDAP is an extension of the MDI programs and develops a coordinated approach between Ameren's residential and business programs, and MDI objectives and campaigns. The Company will report on these activities in a manner consistent with the 2022 Stipulation.

Implementation of MDI (and the MDAP) is completed in large part due to partnerships with Community-Based Organizations or Community Action Agencies that Ameren contracts with directly for services (to date, Ameren has partnered directly with 57 different such organizations for implementation of MDI campaigns). MDI projects are crafted in collaboration with the CBO/CAA to leverage the community partner's strengths and to take advantage of innovation at the most local level, with Ameren serving as a resource to coordinate the specific program support needed to help each be successful, whether that be financial, technical, or marketing/sales, etc.

During the 2022 Plan period, Ameren Illinois will continue to focus on enhancing the positive impact MDI can have for its customers and communities and intends to adhere to the following:

1. A commitment to continue the refinement and use of an innovative, data-driven approaches to assess existing impact and identify additional opportunities to engage underserved customers and communities who have not participated or benefitted, in part or at all, from energy efficiency.

2. An increased workforce development focus on education to K-12 school age children to provide energy efficiency career education and training, as well as practical energy efficiency knowledge.
3. A commitment to continue providing energy efficiency opportunities to customers in an equitable manner, identifying underserved customers when practicable and providing resources available to help lower utility bills, by collaborating with community partners throughout its service territory via the MDI.
4. To undertake the additional reporting and collaboration activities identified in the 2022 Stipulation.

Ameren Illinois is proud to be a community and economic partner for our electric and natural gas customers in central and southern Illinois. The company believes that energy efficiency services and the associated benefits can and do spur local economic development – especially in low-income communities and neighborhoods. Through its energy efficiency initiatives, including the MDI, Ameren Illinois is able to build greater community engagement, create energy industry jobs, and deliver cost savings to those that need it the most.

### **3.12.6 Utility Owned Facility Efficiency**

Ameren Illinois plans to seek opportunities to explore actions that optimize the efficiency of Ameren owned facilities<sup>24</sup> by replacing or modifying existing utility facilities with energy efficient measures.

Improving utility facility efficiency should reduce operational cost thus benefiting Ameren Illinois customers. Ameren Illinois utility facility efficiency improvements would not collect energy efficiency program incentives. Utility facility improvements would also leverage other funding sources and be funded primarily through non-energy efficiency funding and implemented primarily using energy efficiency measures identified in IL-TRM. These utility facility projects will also serve as demonstration projects for non-residential customers looking to increase efficiency in their facilities. However, as Ameren Illinois develops more definite plans for the utility facility efficiency projects it will revisit the concept with the SAG for input and feedback. Ameren Illinois intends to have the savings from these utility facility efficiency projects evaluated to quantify energy savings and to claim any savings identified against the energy savings goals.

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<sup>24</sup> For purposes of this section of the Plan only: (1) an Ameren facility is defined as a building and/or other energy consuming structure that has its own electric and/or gas meter and in which efficiency measures are installed on the customer side of the meter, just like for other Ameren business customers; and (2) no part of Ameren's T&D infrastructure (e.g., substations, transformers, etc.) would be considered a facility and no energy savings from investments in its T&D infrastructure would be counted towards Ameren's savings goals.

### **3.12.7 Application of the IL-TRM and EE Policy Manual**

This Plan expressly relies on, and incorporates the provisions of the Illinois Statewide Technical Reference Manual version 9.0 and the Illinois Energy Efficiency Policy Manual version 2.0. The IL-TRM and EE Policy Manual were jointly developed by Ameren Illinois through participation in the Illinois SAG. Portfolio implementation and evaluation will reference the documents including the incorporation of any changes and updates to the TRM and Policy Manual developed through future SAG processes, as applicable.

### **3.12.8 Supplier Diversity, Inclusion and Investment**

Ameren Illinois recognizes the importance of supplier diversity and inclusion throughout its procurement process including energy efficiency. Ameren Illinois has a corporate commitment to supplier diversity whereby the sourcing process is designed to provide increased opportunities for businesses that are certified as diverse business enterprises (DBE). Ameren Illinois is committed to supporting the communities it serves and in developing strong partnerships with diverse suppliers.

Ameren Illinois will continue to identify increased opportunities for DBEs to provide services and goods in support of the Business and Residential programs by leveraging MDI efforts. The MDI will work to identify DBE offering services in Ameren Illinois territory, providing financial and technical support to assist DBE's in developing capabilities necessary to compete effectively. Additionally, Ameren Illinois will work to review and analyze contract requirements for goods and services with a view towards increasing the availability of work that falls within the performance capabilities of small DBE.

The Ameren Illinois energy efficiency team will work in partnership with its supplier diversity team to foster awareness, enhance collaboration and provide support to increase the diversity of energy efficiency suppliers. This partnership will be a means to build upon and support the supplier diversity goals of the Act.

## **4.0 Evaluation, Measurement and Verification**

Ameren Illinois proposes to engage and collaborate with the Independent Evaluation, Measurement and Verification ("EM&V") contractors in accordance with Section 7 (addressing evaluations) of the EE Policy Manual Version 2.1 and provisions outlined in terms of the Settlement Stipulation and Agreement.<sup>25</sup> Ameren Illinois intends to adhere to the electric and gas EM&V reporting requirements outlined in the Act, EE Policy Manual Version 2.0 and reporting deadlines included in contractual agreements with the independent evaluator, as approved by the ICC. Even though there are no evaluation reporting deadlines outlined within the gas legislation under Section 8-104, where applicable, Ameren Illinois intends to provide joint electric and gas

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<sup>25</sup> Section 8-103B(g)(6); Section 8-103B(g)(9); Section 8-103B(j); 8-104(f)(8).

evaluation reports and will provide those reports under the timing requirements for electric under 8-103B.

## **5.0 Cost Recovery**

### **5.1 Cost Recovery Mechanism**

The Act allows a cost recovery tariff mechanism to fund the proposed energy efficiency measures and to ensure the recovery of prudently and reasonably incurred costs of Commission-approved programs, Section 8-103B(d)(1-3); Section 8-104(f)(7).

For the recovery of gas energy efficiency costs, Ameren Illinois has continued the use of Rider GER – Gas Energy Efficiency Cost Recovery, which was filed with the Commission on April 17, 2017, with an effective date of June 1, 2017 and an updated filed January 15, 2021, effective January 25, 2021. Moreover, pursuant to Section 19-140 of the Act, any gas charge applicable to Residential or Small Non-residential Retail Customers shall provide for the recovery of all costs prudently incurred by the company in association with its on-bill financing program.

Ameren Illinois has continued the use of Rider EE and Rider APM for the recovery of electric energy efficiency costs, which was approved by the Commission. Rider EE – Energy Efficiency and Demand Response Investment was filed with the Commission on August 18, 2017, with an effective date of August 20, 2017. Updates were filed November 5, 2021, effective December 27, 2021 and March 18, 2022 with an effective date of May 2, 2022. As outlined in Rider EE, its purpose is to provide for the recovery of costs, fees and charges for approved Energy Efficiency and Demand-Response Measures implemented in compliance with 8-103, 8-103B and 16-111.5B of the Act, as applicable, in addition to all cost prudently incurred by the company in association with on-bill financing described in Section 16-111.7, through a formula rate. In accordance with Section 8-103B(d)(2) and Section 8-103B(d)(3), the energy efficiency formula rate specifies the cost components that form the basis of the rate charge to customers with sufficient specificity to operate in a standardized manner and be updated annually with transparent information that reflects Ameren Illinois' actual costs to be recovered during the applicable rate year. Rider APM – Annual Performance Modifier was filed with the Commission on October 3, 2017, with an effective date of October 4, 2017. Rider APM purpose is to provide for an adjustment to the return on equity component of Ameren Illinois' weighted average costs of capital in accordance with Section 8-103B(g)(8). The adjustment if any shall be based upon the unmodified AAIG compared to the annual incremental savings determined by the independent evaluator.

### **5.2 Cost Allocations**

In accordance with the gas and electric cost recovery mechanisms as outlined above and in consideration that the Ameren Illinois Plan is an integrated electric and gas Plan, Ameren Illinois requests Commission approval of certain Plan cost allocations. As noted within the cost recovery tariffs, incremental costs may also include portfolio level joint costs common to gas and electric energy efficiency where the proportion of joint costs allocated and recovered through the applicable gas or electric riders will be based on the proportion of the

annual gas or electric portfolio budgets to the total gas and electric annual portfolio budgets. Additionally, non-incentive program costs will be allocated in a similar fashion based on proportion of total budgets. Program Incentive costs will be allocated according to TRC benefits.

## **6.0 Conclusion**

Ameren Illinois respectfully requests that the Commission approve its integrated electric and gas 2022 Plan, as modified by the 2022 Stipulation and Public Act 102-0662, and other requests summarized herein and supported by the 2022 Stipulation and the testimony and exhibits filed in support of this Plan.

## 7.0 Appendices

Appendix A:	Electric Budget
Appendix B:	Electric Savings Goals
Appendix C:	Electric Demand Response Goal
Appendix D:	Gas Budget
Appendix E:	Gas Savings Goal
Appendix F:	Electric and Gas Budget and Modified Savings Goal Summary
Appendix G:	Adjustable Goals Template (electric and gas)
Appendix H:	Program Templates
Appendix I:	Measure Level Inputs
Appendix J:	2022 Settlement Stipulation and Agreement