

Ameren Illinois Company
Electric and Gas Energy
Efficiency Plan
2027 – 2029



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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 revised energy efficiency plan for the four-year period commencing January 1, 2027, (the "2027-2029 Plan" or "2027 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"). This 2027-2029 Plan document modifies the program years 2027-29 which the Commission previously approved in Docket 25-0211, while leaving the previously-approved 2026 program year and its budget, goals and stipulated agreement intact for that year.

The 2026 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 Accountability Committee for the South ("LIEEAC"), which were undertaken over the months prior to its filing. Since the approval of the 2026 Plan, the Illinois Clean and Reliable Grid Affordability Act, Public Act 104-0458 ("CRGA") created new requirements for Ameren Illinois' energy efficiency portfolio, gradually increasing savings goals for 2027-29, adding a peak demand reduction target, increasing budgets, and shifting the cumulative persisting annual savings ("CPAS") framework to a lifetime savings performance target. Since the passage of CRGA, Ameren Illinois has worked with interested stakeholders to develop a balanced, 2027-2029 Plan that will benefit Ameren Illinois customers while complying with the Act.

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 LIEEAC, and designed a robust portfolio of electric and gas energy efficiency programs aimed to achieve energy and electric demand savings. Additionally, the Company designed the Plan's portfolio with a continued focus on energy efficiency investments that will enable customers and communities to thrive while amplifying other benefits to customers, like environmental impacts, achieved in tandem with energy savings. The 2027-2029 Plan will do all this in a manner that also invests substantially in programs for low- and moderate-income (together, "income qualified") customers.

As set forth below, each section of the 2027-2029 Plan provides a narrative of the information in accordance with the requirements of the Act. 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 2027-2029 Plan, as approved by the Commission, to provide customers with the benefits of the programs, initiatives and measures set forth herein.

2.0 Introduction

Section 8-103B and Section 8-104 of the Act require electric and gas utilities, respectively, to implement energy efficiency measures to meet the energy and electric demand 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 revised three-year integrated¹ energy efficiency plan designed to, during the 2027-2029 calendar years, reduce electric and gas energy usage and electric peak demand of residential and non-residential customers

¹ Section 8-104(f)(6)

within the Ameren Illinois service territory.

2.1 2027-2029 Plan Vision and Objectives

This 2027-2029 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, channels and measures that enhances the value delivered to Ameren Illinois' customers.

The guiding vision for Ameren Illinois' Plan is to enable customers and communities to thrive by investing in energy efficiency programs that change lives. Programs change lives by lowering energy bills for residents and businesses, creating local jobs, and instilling a sense of community by working together to address affordability, reliability and climate change.

Ameren Illinois' 2027-2029 Plan fulfills this vision through four key Objectives:

1. Continuing strong community investment, with significant funding for income qualified customers and small businesses in disadvantaged communities.
2. Maximizing energy savings to meet statutory goals through expansive customer and program ally outreach and pursuing new approaches to energy savings.
3. Diversifying offerings through pilot programs and new measures, especially in the market rate single family initiative.
4. Sustaining local workforce growth through continued investment in our industry-leading Market Development Initiative

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 2027-2029 Plan has been developed to balance the objectives of stakeholders, including the Company, meet statutory requirements, and provide 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 3.1 ("EE Policy Manual"), the Illinois Technical Reference Manual, Version 14.0 ("IL-TRM"), and the Settlement Stipulation and Agreement (the "2027 Stipulation") entered into with various non-financially interested stakeholders.²

2.2 Key Features of the 2027-2029 Plan

The 2027-2029 Plan maintains the two core 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 2027-2029 Plan also funds investment in communities, while providing essential program- and portfolio-level functions necessary to deliver energy efficiency to the Ameren Illinois service territory, including: Planning, Implementation and Administration; Outreach, Marketing and

² For ease of reference, the EE Policy Manual version 3.1 can be found at https://www.ilsag.info/wp-content/uploads/IL_EE_Policy_Manual_Version_3.1_FINAL_10-8-2025.pdf; the IL-TRM version 14.0 can be found at <https://www.ilsag.info/technical-reference-manual/illinois-statewide-technical-reference-manual-version-14-0/> and the 2027 Settlement Stipulation and Agreement can be found as Appendix J to this Plan.

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 and natural gas energy efficiency programs, in the Ameren Illinois service territory meaningful opportunities to participate in energy efficiency.

The strategies target a diverse cross section of eligible customers, including, but not limited to:

- Residential single family and multifamily homes/units;
- 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 property owners/managers;
- 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; and
- 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.

In addition to financial incentives, the Ameren Illinois programs provide education, energy assessments, design assistance, project management assistance, Program Ally network development and training; quality assurance, certification and other features to overcome efficiency market barriers.

2.3 Organization of Appendices

Section 3.0 of the 2027-2029 Plan outlines the development process, planning assumptions and electric and gas integration strategies, which were all enhanced through collaboration with stakeholders. The 2027-2029 Plan also includes Appendices that provide the technical details with respect to the budgets, goals, planned participation, and 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 three years covered by the 2027-2029 Plan.

Appendix B, which sets forth the 2027-2029 electric energy savings goals for 2027-

2029.

Appendix C, which provides the electric demand savings goal by calendar year for each of the three years, as well as the planned demand savings (MW).

Appendix D, which provides the three-year 2027-2029 Plan gas planning budget.

Appendix E, which sets forth the 2027-2029 Plan gas savings goals.

Appendix F, which provides a summary of both the electric and gas planning budgets and the 2027-2029 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 2027 Settlement Stipulation and Agreement entered into between the Company and the Natural Resources Defense Council, Community Organizing and Family Issues, by its attorney, the National Consumer Law Center, Aces for Youth, and ICC Staff (the "2027 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 2027-2029 Plan has been developed in accordance with the provisions of the Act, as amended by Public Act 104-0458, and in collaboration with stakeholders with a variety of interests, including the 2027 Stipulating Parties. Due to certain information not available at the time of this filing, including the final list of customers who will opt out from application of select provisions of Section 8-104, an update to the 2027-2029 Plan Appendices will be needed. Subject to Commission approval, Ameren Illinois will make these updates through compliance filings to be filed in this Plan approval docket.

3.1 Development Process

3.1.1 2027-2029 Plan Development Knowledge and Expertise

To maintain consistency and success, Ameren Illinois engaged the services of the ScottMadden Energy Consultants ("ScottMadden") for the analysis and development of the Plan programs. Members of the current ScottMadden team performed several past plan models and advised on the previous potential studies conducted by Ameren Illinois. In addition to the assessment and modeling of the Ameren Illinois' 2027-2029 Plan, ScottMadden has over thirty years of national and international experience on

energy industry experience, with particular experience supporting utilities in demand side management strategy. In particular, members of the current ScottMadden team have experience in Illinois due to previously developing the utility portfolio plan filings for Peoples Gas and North Shore Gas. ScottMadden personnel have also been actively participating in the SAG and the Technical Advisory Committee ("TAC") over the last several years.

ScottMadden's independent expertise provides additional integrity and legitimacy to the 2027-2029 Plan modeling. ScottMadden used their CE Navigator modeling tool to provide state-of-the-art cost-effectiveness analysis of the individual measures. Multiple states throughout the country use the CE Navigator modeling to assess cost-effectiveness.

2027-2029 Plan development also relied on the continued support, guidance, planning, and implementation experience of the Ameren Illinois Energy Efficiency Team, the members of which have 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 2027-2029 Plan has been further enhanced with involvement from participants from across the State, including the 2027 Stipulating Parties. SAG-facilitated development meetings for the 2027-2029 Plan continued to occur prior to filing, and input was sought about Ameren Illinois' energy efficiency plans, goals and the requirements of energy efficiency. Ameren Illinois engaged stakeholders beginning in March 2026, with a protracted discovery, discussion and negotiation process that was held over a series of months leading up to this filing. Ameren Illinois also shared confidential information (e.g., 2027-2029 Plan batch files and 2027-2029 Plan inputs) with Commission Staff and several non-financially interested stakeholder parties who signed Non-Disclosure Agreements.

In addition to the various meetings and presentations to the large group SAG, Ameren Illinois met on numerous occasions with the LIEEAC leadership committee, 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 2027-2029 Plan.

Ameren Illinois has been very appreciative of the ideas and exchange of information received from SAG, Staff, LIEEAC 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 support of the 2027-2029 Plan, as well as the 2027 Stipulation that provided certain elements agreed upon through negotiation to be a part of the 2027-2029 Plan.

3.1.2 Additional 2027-2029 Plan Development Resources

The development of the Plan was also guided by several additional resources including the 2024 Illinois Baseline Potential Study ("MPS") market assessment and potential study, EE Policy Manual,³ and the IL-TRM.⁴ The 2024 MPS was conducted on behalf of Ameren Illinois, Commonwealth Edison and Nicor Gas with process input from interested stakeholders. The MPS 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. The market characterization, load forecasting data, and assumed adoption rates within the study helped inform the potentially achievable savings estimates for the 2027-2029 Plan.

3.1.3 2027-2029 Plan Development Analysis

The CE Navigator is a Microsoft Excel[®]-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.

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 14.0 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 "2026 Plan"), as was consistent with the evaluation framework approved by the Commission for that plan. The Ameren 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

³ Illinois Energy Efficiency Policy Manual Version 3.1 was approved by the Commission in Docket 25-0984.

⁴ The Illinois Statewide Technical Reference Manual for Energy Efficiency version 14.0 was approved by the Commission in Dockets 25-0938.

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 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 just over 100,000 and in one of those towns (Springfield), Ameren Illinois serves only gas. The lower population density in Ameren Illinois territory creates fewer savings opportunities per square mile, increasing project identification and qualification efforts as well as customer engagement costs. 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*) and Section 8-104(m-1), which provide an opt-out process for certain large private energy customers, continue to have a significant impact when implementing programs and achieving savings in the service territory.



Ameren Illinois also must 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 Economic Conditions

Ameren's 2026 Plan filing noted that the 2022-25 portfolio cycle saw some of the highest rates of inflation in the United States in the past decade. While inflation had slowed, the inflation rate as of February 2026 was 2.8% over the prior 12 months, still higher than any individual year between 2014-2020. Additionally, in 2025, the Federal government established tariffs on a broad range of imports across multiple countries, raising the costs of many energy efficiency measures. The combined impact of inflation, tariffs and recent oil and gasoline price increases has been to increase the costs of energy efficient equipment and labor, worsening project economics for both residential and business customers and impeding project implementation.

The Illinois unemployment rate as of December 2025 was 4.8 percent (0.7 percentage points higher than the national average), a level that has increased since the 4.3 percent achieved in December 2024. Employment has increased in healthcare, financial services, information, transportation / warehousing, construction and government employment. But employment has decreased in retail, manufacturing and professional / business services. Job losses signal a decrease in both residential and business customer ability to pay for energy efficiency projects, despite the financial benefits realized from these projects.

Heading into 2027-2029 with significant growth in energy and demand savings goals, Ameren Illinois is sensitive to these volatile economic conditions. Customers will need these energy efficiency programs more than ever, and may be more challenged to pay for them. Our economic development team is working to bring new employers into our service territory, and our energy efficiency programs will seek opportunities in business new construction and major renovation.

3.2.3 Passage of CRGA and Broader Ameren Illinois Clean Energy Transition (CET) Engagement

In addition to making significant changes to Ameren Illinois' energy efficiency framework (discussed throughout this 2027-2029 Plan), CRGA, expands the number of energy programs and options available to Ameren Illinois customers. CRGA drives creation of virtual power plant (VPP) programs, updates solar net metering frameworks, supports geothermal heating systems, and adjusts the State's approach to electrification. As all of these efforts move forward, Ameren Illinois customers will have a wider range of energy options, both heightening awareness and creating more cross-connecting pathways. Ameren Illinois needs to keep energy efficiency as a foundational path for its customers, helping customers secure energy savings while pursuing the best additional options at the same time or as next steps.

3.2.4 Shift from CPAS to Average Savings Life

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). Historically, in Section 8-103B, Ameren needed to achieve cumulative persisting annual savings ("CPAS") goals. CRGA has now removed the CPAS requirement, instead setting an "average savings life" target of at least 12 years, with no more than one-fifth of the incremental annual savings being provided by measures with an average savings life less than 5 years (8-103B(b-16)). The "average savings life" is defined as the lifetime savings divided by the incremental annual savings. Ameren Illinois' 2027-2029 Plan implements the new framework and reports the average savings life for each program year for 2027-2029.

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.

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 cost-effective energy efficiency and demand response savings for customers with additional benefits to the communities in which they live and work.

In the 2022-25 Plan cycle alone, Ameren Illinois

- Served 149,000 income qualified homes while providing \$127 million in incentives to those customers;
- Supported small businesses by completing 17,674 projects.
- Supported disadvantaged community businesses, completing 3,550 business projects across 83 disadvantaged community zip codes.
- Invested \$14.6 million in industry-leading workforce development efforts.
- Created enough electric and gas energy savings to power 166,858 homes.

This 2027-2029 Plan will continue to build on this tradition of successful program delivery and achievement of meaningful energy savings for customers.

3.2.6 Increase in Low- and Moderate-Income Participation

Ameren Illinois proposed significant investment and savings for low- and moderate-income (income qualified) customers in our 2026 Plan. The passage of CRGA has established a minimum of 25% of program budget to target low-income households, with the ability to invest more than the minimum each program year. Investing more than 25%, up to 35% of the program budget, allows Ameren Illinois to reduce the

annual energy savings requirements by 0.025 percentage points for every percentage point increase in income qualified budgeted spend.

Our ongoing work with these customers remains a key attribute of Ameren Illinois' dedication to our residential customers. Income qualified customers are frequently at increased risk of financial hardship due to increases in their energy costs as well as other market conditions, and often have limited discretionary income to invest in energy efficiency improvements. In many cases, the homes that income qualified customers reside in were built before the implementation of uniform energy efficiency code and have the potential to achieve substantial energy savings. Many of these homes 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 income qualified customers continues to be 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.

Ameren Illinois' 2027-2029 Plan sustains our commitment to serving income qualified customers and builds on our focus on Equity Investment Eligible Communities (EIECs).

3.2.7 Electrification for Low- and Moderate-Income Propane Users

The passage of CRGA furthers opportunities to increase participation by business and residential customers through promotion and cost recovery of measures that electrify end uses. Ameren Illinois will continue to target electrification efforts towards low- and moderate-income homes and multifamily buildings using propane as their heating and/or water heating source. CRGA requires that at least 33% of budget to this end serves low-income households. Ameren Illinois' effort will pursue opportunities that reduce total energy costs and maximize bill savings by replacing certain propane fired equipment with efficient electric powered measures. In addition, Ameren Illinois will offer electrification to all customers interested in pursuing projects. Because the peak demand increases associated with electrification must be removed from Ameren Illinois' peak demand savings performance, Ameren Illinois will need to carefully balance investment here with overall portfolio outcomes.

3.2.8 Community and Economic Development

As outlined in the proposed 2028-2031 Multi-year Integrated Grid Plan (MYIGP), Ameren Illinois supports economic development within its service territory to promote job creation and workforce development, expand public services, improve community resilience and equity, and increase competitiveness and innovation. To capture these benefits, Ameren Illinois has proposed a Proactive Economic Development Initiative to target high-growth sectors, build the clean energy economy and promote equitable growth, expansion on or redevelopment of existing sites and the development of new sites.

Ameren Illinois' efficiency program offerings can play a significant role in retaining and attracting business expansions or new business within its service territory. Major expansions and industrial or large commercial new construction will offer project opportunities within Ameren Illinois' Business Custom initiative. Ameren Illinois'

Economic Development team works closely with the Business Energy Efficiency Program team, and will leverage savings opportunities when major employers expand or move into Ameren territory.

3.2.9 Geotargeting of Energy Efficiency under Ameren Illinois' 2028-2031 Multi-year Integrated Grid Plan

In addition to outlining Ameren Illinois' energy efficiency portfolio and its benefits for the Illinois electric grid, the proposed 2028-2031 MYIGP includes the utilization of geotargeting via a pilot in 2028 to identify where energy efficiency would best support grid constraints. Energy efficiency has the potential to provide grid benefits including addressing capacity constraints, improving reliability and addressing asset conditions (among others).

3.2.10 Future of Gas

In 2024, the ICC initiated a "Future of Gas" proceeding to host a series of workshops to ensure that the State's natural gas distribution systems appropriately adapt to the State's decarbonization goals. This series of workshops is intended to address a wide range of topics, including the "role and scope of energy efficiency retrofits, for both residential and Commercial Industrial end-users, to facilitate decarbonization." ICC Docket 24-0158, Initiating Order (Mar. 7, 2024) at 2-3.

Given that these workshops are still underway, final direction on how Ameren Illinois' energy efficiency programs need to address the Future of Gas has not yet been provided. However, throughout the workshops stakeholders have advocated that energy efficiency is the most affordable and technologically ready decarbonization lever. In addition, many stakeholders continue to advocate for all of the above solutions to ensure affordability and reliability. Therefore, Ameren Illinois' 2027-29 Plan will allow market rate residential furnace rebates after calendar year 2027, unless the Illinois technical reference manual dictates otherwise, in addition to weatherization to reduce residential heating and cooling loads. Additionally, Ameren Illinois has eliminated market rate central air conditioning rebates, shifting our focus instead to heat pump rebates, which is also heavily supported within Future of Gas.

3.2.11 Inflation Reduction Act Tax Credits and HOMES / HEAR

The 2022 Federal Inflation Reduction Act authorized tax credits for the installation of residential energy efficient equipment, as well as funding for state energy efficiency and electrification programs. These funds could help customers complete projects within the Ameren Illinois 2027-2029 Plan, and Ameren Illinois has actively engaged in these funding sources as they became available. In particular, the Home Efficiency Rebate Program or HOMES Rebate Program, could provide incentives for "low income households" (i.e., less than 80% of AMI) to implement energy efficiency improvements. And the Home Electrification and Appliance Rebate Program, or HEAR Rebate Program, could provide incentives for heat pumps and appliances, for which more energy efficient options are available in the market.

In early 2025, the Federal government attempted to freeze funding from the Inflation Reduction Act. Currently, the Illinois Environmental Protection Agency (IL EPA, the administering entity for these programs) has received funds for the HOMES Rebate Program but is awaiting program launch approval from the U.S Department of Energy

(USDOE). ILEPA will not award retroactive funds. Illinois' HEAR Rebate Program application has still not been processed by USDOE.

Ameren Illinois has also been in discussions with the Illinois Environmental Protection Agency as it finalizes its program approach. Ameren Illinois is actively facilitating a utility working group to coordinate program delivery with Illinois EPA and is working closely with the Illinois Department of Commerce and Economic Opportunity (DCEO), and plans to leverage these program funds to serve more income qualified customers in our service territory. Given uncertainty in what funds will become available during the 2027-29 Plan timeline,

Ameren Illinois' stipulated agreement with the 2027 Stipulating Parties establishes an adjustable goals framework to discuss HOMES and HEAR funds when and if they become available. In addition, to assist with the facilitation of these funds through the State, Ameren Illinois has included a new budget line item described in 3.11.8.

Electric and Gas Opt-out 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 2026 Plan) to opt- out from participating in or paying for the electric energy efficiency programs ("Opt- out Customers").⁵ Savings provided by large customers who may have participated in 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

⁵ 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.

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.

those who cannot opt out like federal, State, municipal and other public customers or those small to medium-size non-residential 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. Ameren does not plan to re-open Opt-Out for the 2027-2029 Plan. Those Eligible Large Private Customers who opted out for the 2026 Plan will remain opted out for 2027-29.

Gas

Section 8-104(m-1)(2) allows certain large natural gas customers to opt out⁶ from participating in and paying for energy efficiency programs. Ameren Illinois will conduct an opt out process for large gas customers for the 2027-2029 Plan.

3.3 Electric Planning Budgets

Appendix A provides the planning budgets set forth in Section 8-103B(f), (g) and (m) for the 2027-2029 Plan.⁷

The electric planning budgets for each year of the 2027-2029 Plan, beginning January 1, 2027, is limited to 4.21% for 2027, 5.25% for 2028, and 6.06% for 2029 of the average amount paid per kilowatt-hour (kWh) by residential eligible retail customers during calendar year 2023,⁸ multiplied by the Ameren Illinois actual sales for the calendar year 2023 to eligible customers who did not opt-out. The process for customers

⁶ For Ameren Illinois Gas Customers, an Opt Out Customer means a Retail Customer - except for federal, State, municipal and other public customers - with a North American Industry Classification System code number that is 22111 or any such code number beginning with the digits 31, 32, or 33 and:

- i. Annual usage in the aggregate of 4,000,000 therms or more within Ameren Illinois territory or with aggregate usage of 8,000,000 therms or more in this State; or
- ii. Using natural gas as feedstock and meeting the usage requirements described in (i), to the extent such annual feedstock usage is greater than 60% of the customer's total annual usage of natural gas.

Upon receipt of a properly and timeline 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, beginning January 1 of the first year of the next multi-year energy efficiency plan cycle, the opted out customer shall no longer be assessed the costs of the plan and shall be prohibited from participating in that multi-year plan cycle to give the natural gas utility the certainty to design program plan proposals.

The request to opt out is only valid for the requested plan cycle. An eligible large private energy customer must also request to opt out for future energy efficiency plan cycles, otherwise the customer will be included in the future energy efficiency plan cycle.

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 natural gas annual aggregate usage or natural gas feedstock usage no longer meets the relevant thresholds, the Company may, at its sole discretion, remove the Customer from Opt Out Customer status.

A Customer, or Customer at a new Premise, that did not have natural gas annual aggregate usage or natural gas feedstock usage that exceeded the relevant thresholds at 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 usage subsequently exceeds the relevant thresholds.

⁷ Appendix A also provides the planned portfolio breakdown of the budget, which is subject to change during implementation.

⁸ Section 8-103B(m)

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 is 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 is sought during the review process as needed. As allowed under Section 8-103B(l), eligible large private energy customers are 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 are eligible as part of this process is 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-16), (f), (g) and (m).

The incremental annual savings goals are expressed in percentages and are to be applied to the average deemed baseline sales for 2021, 2022, and 2023 of 34,289,170 MWhs less the average annual consumption during the same time period for those customers that have opted out based on Section 8-103B(l).

Section 8-103B (b-16) (1) sets forth an incremental annual energy savings goal, compared to the baseline, equal to 1.4% in 2027, 1.7% in 2028, and 2% in 2029. The annual incremental savings goal can be reduced by 0.025 percentage points for every percentage point increase, above the 25% minimum targeted at income-qualified households, with a maximum goal of 0.25 percentage points less than the energy savings requirement each applicable calendar year.

Ameren Illinois files this 2027-2029 Plan, which is designed to achieve a lifetime energy savings for each program year, equal to the product of each year's incremental annual savings goal and the minimum average savings life, which is 12 years.

Please see Appendix B for the calculation of Ameren Illinois electric incremental energy savings goals for the 2027 Plan.

3.5 Demand Savings

Appendix C provides the electric demand savings goal by calendar year (MW). Section 8-103B (b-16) (2) sets forth an incremental annual coincident peak demand savings goal. The peak demand goal is calculated by dividing the amount of the energy saving goal calculated in Section 8-103B (b-16) (1) by the actual average ratio of kilowatt-hour savings to coincident peak demand reduction achieved by the utility through its energy efficiency programs in 2023. Under the Ameren Illinois Multi-Year Rate Plan (MYRP), the Commission established a performance metric that achieves peak load reduction attributable to demand response programs that result in offsetting resource adequacy needs. In response to this requirement, Ameren Illinois launched residential and business demand response programs across its service territory to reduce or shift customer electricity peak demand. Ameren Illinois has coordinated promotion of its energy efficiency and MYRP demand response programs and will continue to do so during the 2027-29 portfolio.

3.5.1 Gas Planning Budget

Appendix D provides the gas planning budgets set forth in Section 8-104(d) for the 2027-2029 Plan.⁹

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.

Considerations were made in the planning process as they relate to the provisions in Section 8-104(m-1) of the Act, which states "subsections (a) through (k) of this Section do not apply to eligible customers of a natural gas utility that have chosen to opt out of multi-year plans." This provision reflects the fact that beginning January 1, 2027, gas customers meeting the eligibility requirements of Section 8-104(m-1) can opt out of energy efficiency charges under Rider GER and would not participate in Ameren Illinois gas energy efficiency programs.

3.6 Gas Savings Goals

Appendix E provides the three-year 2027-2029 Plan gas savings goals. Per Section 8-104(c), as modified by subsection (d), the gas savings goal of 1.5% is applied to the qualified sales (excluding certain sales under the Act) for the base calendar year 2009.

Adjustments will be made to these goals as they relate to the provisions in Section 8-104(m-1) of the Act, which addresses Gas Opt-Out Customers. Gas Opt-Out Customers will not be known until after the close of the December 2026 billing period. After the Gas Opt-Out Customers have been identified, Ameren Illinois will make a compliance filing that adjusts the qualified sales for the purpose of goal determination. This compliance filing will revise the savings goals for 2027-2029.

Customers that Opt Out from the energy efficiency programs are not eligible for participation in Ameren Illinois gas energy efficiency programs.

3.7 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 and electric demand 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, 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

⁹ Appendix D also provides the planned portfolio breakdown of the budget, which is subject to change during implementation.

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 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 income qualified measures.

3.8 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).

3.8.1 Low-Income

One of the requirements for Ameren Illinois in this Plan is the funding and implementation of low-income programs for both electric¹⁰ and gas.¹¹ For electric, the low-income households are defined as households at or below 80% of area median income ("AMI") and expenditures to implement the measures shall be no less than 25% of total energy efficiency spending per year. For gas, the low-income households are also defined at 80% of the area median income. Ameren Illinois must leverage existing state and federal low-income weatherization programs and delivery capacity where practicable, and prioritize contracting with businesses with a track record of delivering weatherization in low-income communities. Further, Ameren Illinois must spend at least 25% or five percentage points more than the proportion of total annual gas sales to non-opt-out retail customers that are consumed by low-income households, whichever is greater. At least 80% of the spending targeting low-income households delivered through whole building weatherization programs, and Ameren must invest in health and safety measures to comprehensively weatherize single-family and multi-family buildings of low-income households with up to 15% of income qualified spending.

Moreover, as reflected in the 2027 Stipulation, the term "low-income customers" during implementation will be defined as household income at or below 80% AMI. The Company also incorporates other funding commitments as set forth in Appendix J, including with respect to the Low-Income Energy Efficiency Accountability Committee ("LIEEAC").

3.8.2 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, public institutions of higher education, 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

¹⁰ Section 8-103B(c)

¹¹ Section 8-104(e-7) and (e-8)

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

3.8.3 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.¹²

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: High Performance Windows, Luminaire Level Lighting Controls and Advanced Rooftop Units. Others for consideration include EnergyStar Retail Products Platform, and Efficiency Codes and Standards. 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.

In addition to these market transformation efforts, Ameren Illinois will continue to work with market actors to generate and capture market effects for high efficiency residential HVAC equipment. These market effects represent sales of efficient equipment to customers within its service area that are attributable to the Ameren Illinois program efforts but occur outside of the program (i.e., without incentives). Ameren has been collecting full category sales information from distributor partners throughout the service area to establish and validate these market effects.

¹² Section 8-104(e-5)

3.8.4 Electric Funding for Gas Programs

Section 8-103B(b-25) allows for electric utilities to count savings of fuels other than electricity toward the achievement of its incremental annual savings goal, and the energy savings value associated with such other fuels shall be converted to electric energy savings on an equivalent Btu basis at the premises. However, in no event shall more than 20% of each year's incremental annual savings requirement be met through fuels other than electricity. To the extent that a utility counts either improvements to the efficiency of the use of gas and other fuels or the electrification of gas and other fuels toward its energy savings goal, as permitted under paragraphs (b-25) and (b-27) of this Section, it must estimate the actual impacts on coincident peak demand from such measures and count them, whether positive or negative, toward its coincident peak demand savings goal. Only coincident peak demand savings from efficiency measures shall count toward this goal.

3.8.5 Power Factor Correction

While Ameren has been improving power factor on its systems through its voltage optimization efforts in its energy efficiency programs, Ameren Illinois does not fund Power Factor Correction (PFC) for customers in its energy efficiency portfolio. Power Factor is defined as the ratio of working power (kW) to apparent power (kVA), where higher power factors indicate higher efficiency. At a customer site, a power factor less than one indicates that some portion of the real electric energy provided by the utility shifts to apparent power, generally due to large motor electric loads. Customer PFC projects are able to reduce the amount of real electric energy provided by the utility to the customer, but do not reduce the amount of real power measured on the meter.

Ameren Illinois' electric energy efficiency goals are tied to levels of customer electric energy usage, not system electric energy produced. As a result, PFC is not an eligible measure, because its impact (i.e., reducing system electric energy) falls outside of the calculation methodology for Ameren's goals. Including PFC in its energy efficiency plan would require a legislative change to add PFC to the definition of energy efficiency, and then creation of the measure within the Technical Reference Manual to establish the savings methodology.

3.9 Portfolio Design

As explained herein, the 2027-2029 Plan builds upon the Commission-approved 2026 Plan, which was designed to meet several key portfolio objectives formed around compliance with the prior 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.

3.9.1 Plan/Portfolio Objectives

Ameren Illinois will seek to offer a robust portfolio of electric and natural gas measures, as well as voltage optimization measures,¹³ 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 income qualified customer sectors within portfolio budgetary

¹³ Per Section 8-103B (b-20), and approved in ICC Docket #22-0487

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 continue Ameren Illinois' commitment to provide best in class energy efficiency programs.

Ameren Illinois' vision, as shown in Section 2.1, leads to the following objectives for the portfolio of programs:

- Strong Community Investment: Ameren's 2027-2029 Plan focuses on Equity Investment Eligible / Disadvantaged Communities, maintaining a high level of income qualified program spending for efficiency, health and safety and targeting small businesses within designated communities.
- Maximize Energy Savings: given the shifting savings opportunity landscape, Ameren will pursue new approaches to program design to broaden customer outreach, maximize opportunities and accelerate energy savings performance.
- Diversify Offerings: Ameren will increase our investment in Market Rate Single Family offerings, including new measures, and will pursue pilots to bring innovative solutions to our customers.
- Workforce Development Growth: Ameren's Market Development Initiative supports program ally growth and workforce development, and increased Program Ally Support will focus on training and development of the existing allies.

The 2027-2029 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;
- Integrate the delivery of programs promoting distributed solar, programs promoting demand response and other efforts to address bill payment issues;
- 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.

3.10 Portfolio Elements

Two programs comprise the 2027-2029 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 2027-2029 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 2027-2029 Plan period.

3.10.1 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-income¹⁴ 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

Residential Program Structure	Major Program Changes from 2026 Plan
Market Rate Single Family	<ul style="list-style-type: none"> • Most of the Residential Program is maintained into the 2027-2029 Plan cycle.

¹⁴ 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.

Market Rate Multi-Family	<ul style="list-style-type: none"> • School Kits channel is still refocused on income qualified customers and moved under the Income Qualified Initiative. • Residential Market Transformation remains in the Residential program for expansion and tracking purposes. • Appliance Recycling is added as a channel in the Income Qualified Initiative. • Market Rate Behavioral is added as an initiative to capture savings and promote participation in Market Rate Single Family and Retail Products. • Public Housing is moved from an initiative to a channel under the Income Qualified Initiative.
Retail Products	
Residential Market Transformation	
Residential Behavioral	
Income Qualified	

3.10.2 Business Program

The Business Program is comprised of six core initiatives that provide incentives and services to non-residential customers, excluding Opt-Out Customers, 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 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

Business Program Structure	Major Program Changes from 2026 Plan
Standard	<ul style="list-style-type: none"> • Midstream Lighting Channel is substantially reduced due to state legislation and will be discontinued beginning in 2027. • Small Business is expanded to include three incentive tiers - standard, enhanced and disadvantaged communities.
Small Business	
Midstream	

Custom	<ul style="list-style-type: none"> Business Market Transformation remains in the Business program for expansion and tracking purposes.
Retrocommissioning	
Business Market Transformation	

3.10 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; 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 the electric and gas energy efficiency portfolio.

3.10.3 Planning, Implementation and Administration

The planning, implementation and administration activities include a myriad of activities. The development and execution of Ameren Illinois’ portfolio strategy utilizes 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 started recovering through its Rider EE beginning with the 2021 EE Rider proceeding.

3.10.4 Outreach, Marketing and Communications

Outreach, marketing, and communications remain critical pillars of Ameren Illinois' electric and natural gas energy efficiency strategy. These efforts serve as vital mechanisms to educate customers on the value and long-term benefits of energy efficiency while increasing awareness of available programs and resources. Through targeted, consistent, and strategic communications, Ameren Illinois will ensure customers and Program Allies are informed, engaged, and empowered to participate across the portfolio—ultimately driving program adoption, strengthening partnerships,

and advancing our energy efficiency goals.

Over the past several program cycles, Ameren Illinois' Energy Efficiency portfolio has received consistent recognition from leading industry organizations, reflecting sustained excellence in leadership, program design, marketing, education, and community engagement. Regional acknowledgments highlight the portfolio's ability to deliver impactful, equity-focused solutions through strong partnerships, effective customer education strategies, and a disciplined, outcomes-driven approach to outreach and market engagement. Collectively, these recognitions demonstrate peer-validated confidence in the program's strategic direction, operational rigor, and long-term value.

National recognition further reinforces Ameren Illinois' reputation as an innovator in energy efficiency delivery. Awards for program design excellence highlight the portfolio's success in simplifying access for large customers while enabling deeper, multi-project efficiency strategies, while additional recognition for rapid program adaptation reflects the organization's resilience and customer-centered response during periods of disruption. Looking ahead, Ameren Illinois remains committed to continuing this proven plan of action—building on recognized best practices, strengthening partnerships, and advancing innovative, equitable energy efficiency solutions that deliver lasting value to customers and communities across the service territory.

As part of a forward-looking electric and natural gas energy efficiency strategy, outreach, marketing, and communications will continue to play a critical role in shaping a seamless and informed customer journey. Ameren Illinois will intentionally strengthen collaboration with Clean Energy Transition teams to ensure customers experience a clear, coordinated, and integrated pathway into clean energy solutions. By aligning messages, timing, and touchpoints across teams, Ameren Illinois will reduce customer friction, improve awareness, and reinforce energy efficiency as a foundational element of the broader clean energy transition.

Marketing efforts will also continue to thoughtfully incorporate the Market Development Initiative (MDI) into outreach and communications, where applicable, to elevate awareness and reinforce its position as a core component of the portfolio. By infusing MDI messaging across relevant campaigns, Ameren Illinois will highlight the program's value, purpose, and impact—ensuring customers, Program Allies, and stakeholders understand how the Initiative supports equitable access, market growth, and long-term program success.

Data and analytics will remain central to driving informed, results oriented marketing decisions. Ameren Illinois will consistently track and measure the performance of marketing messages to better understand customer behaviors, identify trends, and assess overall effectiveness. These insights will be used to make strategic adjustments to messaging, delivery timing, and communication channels, enabling Ameren Illinois to respond to changing customer needs and market conditions in a timely and

intentional manner. Additionally, Ameren Illinois will leverage data segmentation tools to further refine and tailor outreach, ensuring messages resonate with distinct audiences and increase conversion rates while maximizing program participation.

To continuously strengthen program performance, Ameren Illinois will use industry benchmarking to evaluate the effectiveness of our marketing strategies against peer utilities and best practice standards. This benchmarking will help validate Ameren Illinois approach, identify gaps, and inform opportunities for innovation. In parallel, Ameren Illinois will actively engage with and learn from other marketing departments within the utility industry through collaboration and information sharing. These engagements will support continuous improvement, foster alignment across the industry, and surface new ideas that advance Program marketing, customer engagement, and overall portfolio impact.

3.10.5 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.

3.10.6 Research, Development and Breakthrough Equipment & Devices ("BED")¹⁵

Potential innovations in energy efficiency-related technologies are on the horizon, and new, innovative products and services may become available. Ameren Illinois seeks to assist 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.

Ameren Illinois employs targeted pilot initiatives to evaluate emerging technologies and delivery approaches prior to broader program deployment. These pilots support continuous improvement of energy efficiency offerings while managing risks associated with new technologies, including uncertain performance, customer adoption, implementation complexity, and cost-effectiveness.

As the energy efficiency marketplace evolves, pilot activities allow Ameren Illinois to assess innovative technologies, analytics, and program concepts at an appropriate scale and with deliberate oversight. Lessons learned through pilots inform program design decisions and help ensure that only cost-effective, scalable solutions are advanced.

Pilot initiatives are managed through a structured stage-gate governance framework:

¹⁵ 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.

- **Discover:** Identification, screening, and selection of pilot concepts aligned with system needs and customer value.
- **Pilot:** Time-limited pilots with defined scope, budget, and learning objectives to assess savings potential, customer acceptance, operational impacts, and costs.
- **Incorporate:** Evaluation of results to determine whether concepts should be refined, expanded, or integrated into full-scale programs.

Ameren Illinois anticipates exploring pilot efforts across a range of emerging areas, including:

- Advanced electrification, heat pump and heat transfer technologies,
- Residential new construction approaches, such as for manufactured homes or all-electric design,
- Peak demand-focused solutions, such as controllers for residential and business equipment
- Next-generation building envelope measures, such as advanced window designs, smart glass or cost-effective retrofit kits, or
- Data-driven targeting using AMI analytics.

These activities will inform future program development and filings while supporting long-term customer and system benefits.

3.10.7 Market Development Initiative

In 2018 Ameren Illinois began to implement its Market Development Initiative ("MDI"). The MDI is a targeted effort to identify and implement ways that 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.

MDI still faces specific challenges to be addressed, notably a geographic mismatch between supported talent and potential employers and slower job growth in Ameren territory than the national average.

Into the 2027-2029 Plan period, spanning 2027-2029, 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 and C, will be 3.5% of the total electric and gas planning budget, on an average annual basis, during the three-year plan period and the funding will support a variety of program activities set forth in Appendix J.

Ameren Illinois will continue to build upon one of its key MDI strategies which has been to leverage partnerships with community-based organizations (CBOs) to allow these organizations to speak as a trusted voice to customers in need that are often their clients. In addition to partnering with CBOs, the MDI will engage contractors, job seekers and businesses that reside in or serve energy income eligible and disadvantaged communities to introduce them to opportunities in the energy efficiency industry.

To achieve the objectives of the MDI, Ameren will continue the following efforts and initiatives, many of which are intended to overlap in serving multiple MDI

objectives. Additionally, the Company will incorporate new efforts to address opportunities identified in the third-party evaluations:

1. Engage with customers in energy income eligible and disadvantaged 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 level¹⁶
 - f. Marketing support and resources
 - g. Partnering with organizations to leverage additional funding sources
2. Build the energy efficiency workforce inclusive of jobseekers in energy income eligible and disadvantaged communities
 - a. Internships
 - b. Scholarships
 - c. Workforce Development Research
 - d. Workforce Development Pipeline and Engagement Efforts
 - e. Strengthening the Connection between Workforce Development and Incubator
 - f. Implement Standardized Post-Participation Outcomes Tracking
3. Advance and transform business procurement
 - a. Portfolio-wide Procurement Opportunities
 - b. Procurement Advancement and Transformation Hub (PATH) Vendor Database
 - c. PATH Vendor Surveys
 - d. PATH Program Ally Incubator and Accelerator
 - e. Program Ally Incubator Mentors and Business Plan Check-Ins
 - f. Program Ally Incubator Alumni Collaboration
 - g. Staffing Grants
 - h. Equipment Grants
 - i. Technical and back-office support
 - j. Funding for training

¹⁶ 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.

k. 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. The Company will report on MDI activities in a manner consistent with the 2027 Stipulation.

Implementation of MDI 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 partnerships with such organizations for implementation of MDI campaigns throughout the majority of our territory and plans to expand to full coverage throughout our customer communities). MDI projects are crafted in collaboration with the CBO/CAAs 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 2027-2029 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 innovative, data-driven approaches to assess existing impact and identify additional opportunities to engage customers residing in energy income eligible and disadvantaged communities who have not fully engaged or benefitted, from participating in energy efficiency programs.
2. A continued workforce development focus on education to K-12 school age children, adult learners, and other jobseekers to provide energy efficiency career knowledge and training.
3. A commitment to continue to be inclusive of customers in energy income eligible and disadvantaged communities when providing access to energy efficiency opportunities by providing resources available to help lower utility bills through collaboration with community partners throughout its service territory via the MDI.
4. A commitment to hire a contractor with experience and expertise with energy efficiency and advancing access, procurement and workforce development to assess the effectiveness of different elements of Ameren's MDI.
5. To undertake the additional reporting and collaboration activities identified in the 2027 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.

3.10.8 Application of the IL-TRM and EE Policy Manual

This 2027-2029 Plan expressly relies on and incorporates the provisions of the Illinois Statewide Technical Reference Manual version 14.0 and the Illinois Energy Efficiency Policy Manual version 3.1. 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.

3.10.9 Supplier Diversity, Inclusion and Investment

Section 8-103B(g)(9.5) of the Act calls for Ameren Illinois to demonstrate how it will ensure that program implementation contractors and energy efficiency installation vendors will promote workforce equity and quality jobs. On an annual basis, Ameren Illinois is to report to the ICC on how hiring, contracting, job training and other practices enhance the diversity of vendors working on such programs and engage businesses with their primary place of business and / or workforce within Ameren Illinois service territory.

The Ameren Illinois energy efficiency team will work in partnership with its supplier enablement team to foster awareness, enhance collaboration and provide support to energy efficiency suppliers in accordance with the 2027 Stipulation. As required by the Act, Ameren Illinois will report annually on the results of these efforts.

3.10.10 Maintaining Added Portfolio Budget Categories

The 2027-2029 Plan maintains two portfolio-level budget line items that were added to the 2026 Plan to assist Ameren Illinois in meeting the energy savings goals and expanding customer impacts. These budget line items will be imperative to expanding portfolio support and coordination with two key portfolio partners – program allies and the Illinois Environmental Protection Agency (ILEPA). The two new budget line items are described below:

- Program Ally Support (Electric and Gas) - This budget will provide enhanced support to expand the skills of program allies. The expansion of skills will help to increase the amount of qualified candidates in the workforce that are vital to portfolio success. Ameren Illinois intends to help educate the program ally network in energy efficient equipment to encourage broader adoption of newer technologies (e.g. heat pumps). Implementing more comprehensive projects will require program allies to have a solid understanding on the benefits of efficient equipment (Heat pumps and heat pump water heaters). Targeted efforts may include, but are not limited to:
 - Specific engagement to support expansion of initiatives, channels, or measures (multifamily, Single Family Income Qualified, building envelope, Small Business, commercial refrigeration, health and safety)
 - Marketing support for new and existing allies.

- Training for program allies and distributors, bringing them together with manufacturers to provide technical training on newer, more efficient technologies.
 - Expansion of and enhanced access to web-based support tools, such as the Program Ally Portal, to streamline documentation processes
 - Facilitated collaboration between internal and external parties to enhance the integration of job candidates into the Ameren Illinois Energy Efficiency program through the CEJA workforce development hubs.
- Inflation Reduction Act ("IRA") Coordination (Electric Only) - To demonstrate Ameren Illinois' firm commitment to leveraging funds from IRA, Ameren Illinois has dedicated funding towards collaboration efforts with the ILEPA that will allow for a smooth integration of a new funding stream and potential program design changes. The budget will support collaboration and coordination with the ILEPA and potential customers receiving braided funding. This may include hiring an external consultant and leveraging internal AIC support. This approach will ensure that the AIC EE program remains flexible and responsive to changes in funding availability and program requirements.

3.10.11 Gas Budget and Savings Update Process

Because Gas Opt-Out Customers are not known until after the close of the December 2026 billing period, Ameren Illinois used a proxy list for planning purposes. As with the 2026 Plan, Ameren Illinois proposes the approval of a budget and savings update process to comply with this provision. After the Opt-Out Customers have been identified, Ameren Illinois will make a compliance filing within the later of 60 days after the close of the December 2026 billing period, or 180 days after the Commission finalizes the form. If the impact to the budget from the Opt-Out Customers results in an overall increase, Ameren Illinois will adjust program or other non-program budgets to account for the change. Accordingly, if the impact to the budget from the Opt-Out Customers results in an overall decrease, Ameren Illinois will adjust program or other non-program budgets, other than the budget for the Income Qualified Initiative, to account for the change. The Company does not intend to make any changes to the initial rates approved by the Commission to be charged under Rider GER in 2027 as a result of the truing up of budgets associated with differences between actual and forecast Opt Outs.

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 3.1 and provisions outlined in terms of the

Settlement Stipulation and Agreement.¹⁷ Ameren Illinois intends to adhere to the electric and gas EM&V reporting requirements outlined in the Act, EE Policy Manual Version 3.1 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 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). Ameren Illinois has continued the use of Rider EE, Rider GER, and Rider APM for the recovery of electric and gas energy efficiency costs, which was approved by the Commission. The purpose of the Rider EE is to provide for the recovery of costs, fees, and charges, for approved Energy Efficiency and Demand-Response measures implemented in compliance with 8-103B of the Act. The purpose of Rider GER is to provide for the recovery of costs, fees, and charges, for approved Energy Efficiency and Demand-Response measures implemented in compliance with Section 8-104. The purpose of the Rider APM 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) of the Act. The Rider APM adjustment for the years 2027-2029, if any, shall be based on the guidance outlined in Section 8-103B(g)(8.5).

Ameren Illinois filed contemporaneously with its petition and proposed 2027 -2029 Plan the proposed tariff mechanisms including Rider EE, Rider GER and Rider APM which will be placed into effect in 2027.

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. If budget adjustments occur pursuant to Section 3.10.11 above, allocations for costs incurred prior to the implementation of the revised budgets shall remain unchanged, provided that the final allocation of non-incentive program costs is within two percent (2%) of the final approved proportion. 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.

¹⁷ Section 8-103B(g)(6); Section 8-103B(g)(9); Section 8-103B(j); 8-104(f)(8)

6.0 Conclusion

Ameren Illinois respectfully requests that the Commission approve its integrated electric and gas 2027-2029 Plan and other requests summarized herein and supported by the 2027 Stipulation and the testimony and exhibits filed in this 2027-2029 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: Settlement Stipulation and Agreement