

Initial Response to Ameren Updated 2026-2029 EE Plan

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National Consumer Law Center (NCLC)

- Since 1969, the nonprofit National Consumer Law Center® (NCLC) has used its expertise in consumer law and energy policy to work for consumer justice and economic security for low-income and other disadvantaged people, including older adults, in the U.S.
- NCLC's expertise includes policy analysis and advocacy; consumer law and energy publications; litigation; expert witness services, and training and advice for advocates. NCLC works with nonprofit and legal services organizations, private attorneys, policymakers, and federal and state government and courts across the nation to stop exploitative practices, help financially stressed families build and retain wealth, and advance economic fairness.

Income Eligible Budget Changes

NEW DRAFT PLAN	2027 (Combined E&G)	2028 (Combined E&G)	2029 (Combined E&G)	PRIOR PLAN	2027 (Electric)	2028 (Electric)	2029 (Electric)
IQ Single-Family	\$33.9M	\$41.6M	\$45.2M		\$21.6M	\$20.8M	\$20.8M
IQ Multifamily	\$14.1M	\$18.6M	\$20.8M		\$14.1M	\$14.1M	\$14.1M
Electrification	\$.95M	\$1.0M	\$1.4M		\$1.2M	\$1.2M	\$1.2M

- Electric annual budget increased \$126.1M to \$218.7 (on average annually) over 2027-2029, a 73% increase.
- Glad to see increases in SF whole-building weatherization programs, proportional to budget on average.
- Need better understanding of the basis for the comparatively low MF numbers. (Budget does not match proportional increase in SF weatherization or overall increase in total portfolio budget.)
- Need more information about amounts coming from gas utilities given they are joint programs
- Why the decrease in electrification spending (propane to electric) given increased overall budget?
- Still need to compare Manufactured Housing budgets (Does average annual spend match percentage increase in overall portfolio budget?)

Braided Community Action Agency Budgets

NEW DRAFT PLAN	2027 (Combined E&G)	2028 (Combined E&G)	2029 (Combined E&G)	PRIOR PLAN	2027 (Electric)	2028 (Electric)	2029 (Electric)
CAA Braided Program	\$3.8M	\$3.7M	\$3.7M		\$3.3M	\$3.3M	\$3.3M

- Why the small increase in CAA Braided budgets?
- Need understanding of Ameren Gas contribution amounts

Other Observations...

- Glad to see holding of the line on Kits spending
- Why return to spending on Behavioral programs (OPower letters?)
- **We should not be starting negotiations "from scratch."**
 - Much time spent in 2024-2025 negotiating program protocols and other details that should not change here;
 - Stakeholders' goal in negotiating those provisions has been about achieving best practices in the delivery of EE programs;
 - In particular, negotiations relative to IQ whole building program comprehensiveness is critical to NCLC/COFI;
 - Stakeholders can identify provisions that need to remain in 2026-2029 Stipulation for the Company's review.
- When explaining bill impacts to customers for electrification, incorporate low-income discount rates in calculations where applicable.

Are IQ Customers Given a Choice of Weatherization programs (IHWAP or Ameren's?)

- Please elaborate on how the SF and MF weatherization programs operate. (Are customers whose income falls between 0 and 200% of FPL given the opportunity to participate in Ameren programs?)
- Particularly given the low budgets for the CAA-braided program, for projects funded exclusively by Ameren, customers with household incomes between 0% and 200% of the Federal Poverty Level (FPL) who are eligible for a retrofit (weatherization) can and should be given the option to participate in the utility only funded (Ameren) retrofit offering *or* be referred to a participating agency for service through IHWAP. These customers should be provided with information about the differences between the utility-only retrofit offering and the IHWAP program, including available appliance, weatherization, and health and safety measures in each program, as well as the status of IHWAP waiting lists and prioritization criteria, to assist them in choosing which programs works best for their needs.

Bottom Line Takeaways/Questions

- Increase in IE spending (25% minimum) now required under law.
- Can you increase IE whole building (MF and SF) weatherization even more and still hit savings targets?
- Need more information on gas spending for joint weatherization programs
- How do we increase budget allocated to the braided weatherization program? (If you build it, they will come in terms of capacity?)
- If ComEd prevails in ICC proceeding proposing solar as EE TRM measure, what is the impact on Ameren's portfolio?

Questions?



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