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# **SAG Feedback on Ameren's revised 2027-29 EE Plan presentation from 3/4/26**



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3/17/2026

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# Relationship to Approved Plans

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Per the Approved 2026-2029 Plan Stipulation (language below), NRDC feels it is imperative to retain portfolio provisions agreed to in the stipulation unless they are directly changed by statute updates under Public Act 104-0458.

*V. B. To the extent that there are changes in applicable law or regulation that materially impact, rights, obligations or the implementation of the 2026 Plan or provisions of this Stipulation, the Parties agree to work expeditiously and collaboratively with the goal of reaching consensus on the related impacts **and the need - if any - for adjustments to, or amendment or replacement of, the Stipulation or the 2026 Plan.***

These provisions include, but are not limited to, weatherization protocols, MDI metrics, equipment replacement criteria, etc.

# Program Overview

		Electric			Gas		
		2027	2028	2029	2027	2028	2029
Budget (MM)	Res	\$16.6	\$22.0	\$26.7	\$3.5	\$5.5	\$7.0
	IQ	\$62.3	\$77.7	\$89.7	\$8.5	\$7.3	\$6.6
	Bus	\$64.5	\$79.3	\$90.2	\$3.9	\$3.0	\$1.9
	Portfolio Costs	\$34.6	\$43.1	\$49.7	\$2.7	\$2.7	\$2.6
Savings (MWh/Therm)	Res	34,043	44,664	57,308	1,364,785	1,860,471	2,548,934
	IQ	88,599	111,249	137,840	615,486	731,123	1,003,069
	Bus	207,887	262,072	297,770	759,336	578,261	297,304
	VO	25,000	20,000	0	0	0	0
Savings (MW)	Res	5.45	7.16	9.30	0	0	0
	IQ	8.28	10.17	12.86	0	0	0
	Bus	24.16	30.96	34.67	0	0	0
	VO	4.07	3.26	0	0	0	0

Please list the weighted average measure life for each year under electric and gas.

Please explain the rationale for electric portfolio costs that equate to 19.4% of total budgets in each of the three years: from \$34.6M in 2027 to \$43.1M in 2028 and then \$49.7M in 2029.

Electric IQ budgets are robust. More questions to come.

Please explain why gas budgets ramp up over the three years for Market Rate Residential, but they ramp down in IQ and Business.

# Business

	Combined Electric and Gas Budgets		
Initiative	2027	2028	2029
Standard	\$19,129,067	\$25,994,715	\$30,106,903
Small Business	\$21,929,932	\$23,213,564	\$24,637,044
Midstream Lighting	\$4,271,144	\$4,125,126	\$3,993,715
Midstream Food Service	\$603,160	\$603,160	\$603,160
Custom	\$16,441,169	\$21,073,354	\$23,083,371
Retro-Commissioning	\$5,269,617	\$6,511,847	\$8,935,041
Business Market Transformation	\$773,868	\$773,868	\$773,868
<b>Total</b>	<b>\$68,417,957</b>	<b>\$82,295,634</b>	<b>\$91,133,101</b>

New law removes certain barriers to commercial & industrial electrification program spend. NRDC strongly encourages AIC to offer a channel – particularly for industrial electrification – to start making investments in that market.

Encourage a small Business New Construction offering.

# Market Rate Residential

	Combined Electric and Gas Budgets		
Initiative	2027	2028	2029
Market Rate Single Family	\$11,301,690	\$17,468,756	\$21,792,448
Market Rate Multi Family	\$2,670,838	\$3,167,645	\$3,629,187
Retail Products	\$4,752,205	\$5,001,701	\$5,453,521
Market Rate Behavioral	\$936,740	\$1,357,595	\$2,280,759
Residential Market Transformation	\$509,000	\$494,000	\$494,000
<b>Total</b>	<b>\$20,170,473</b>	<b>\$27,489,697</b>	<b>\$33,649,914</b>

NRDC would like to see more investment within the Market Rate Multi Family channel, particularly within inefficient electrically heated units.

# Income-Qualified

Combined Electric and Gas Budgets			
Channel	2027	2028	2029
Appliance Recycling	\$1,398,956	\$1,538,852	\$1,818,643
IQ Behavioral	\$570,190	\$868,860	\$1,444,481
School Kits	\$786,715	\$965,309	\$1,206,680
CAA	\$3,841,535	\$3,777,034	\$3,754,450
IQ Single Family	\$33,912,207	\$41,636,498	\$45,249,903
IQ Multifamily	\$14,173,808	\$18,611,958	\$20,899,060
IQ Retail Products	\$1,901,941	\$1,842,315	\$2,534,253
IQ Online Marketplace	\$2,873,838	\$2,587,159	\$2,628,976
Community Kits	\$342,946	\$685,954	\$857,521
Smart Savers	\$739,895	\$716,579	\$704,922
Electrification	\$950,456	\$1,092,679	\$1,425,830
Manufactured Homes	\$4,301,121	\$4,899,877	\$6,290,271
Public Housing	\$4,988,598	\$5,734,806	\$7,483,222
<b>Total</b>	<b>\$70,782,205</b>	<b>\$84,957,879</b>	<b>\$96,298,211</b>

AIC had verbally noted they plan to spend 32% of their budget on IQ ( $\leq 80\%$  AMI) and 3% on moderate-income (80% AMI-300% FPL) for a total of 35% annual spend.

- Please break out that spending per program channel on the two offerings.
- Please share a breakdown of how the Company plans to verify income for program qualification for moderate-income programs.
- NRDC prioritizes a robust moderate-income portfolio and, pending what dollar amounts AIC has in mind, will most likely prefer that segment to be increased within whole-home weatherization programs.

# Income-Qualified, cont.

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For whole-building weatherization, separately for single-family and multifamily – as well as IQ and moderate-income – please share what fraction of spending and savings are from:

- Weatherization of already electrically heated buildings
- Weatherization of buildings that are also electrified under EE
- Weatherization of gas-heated buildings through joint delivery with Nicor Gas
- Weatherization of gas-heated buildings by Ameren alone

Encourage a New Construction offering.

Electrification levels are very low compared to other programs.

- How much of this channel is planned for full vs partial electrification?
- NRDC would like to see budgets increased.

Please explain the CAA channel budget stagnation from the Approved Plan to this plan. Seems low. 7

# Ameren Gas

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- Not clear from 3/4 presentation what's changing from Approved Plan 6.
- Does the Company plan to maximize the new 15% Health & Safety spend? If not, why? NRDC feels strongly about maximizing this investment in pre-weatherization.
- Through what channels does AIC plan to meet the new statutory requirement of 80% of IQ spend on whole-building programs?
- What is the estimated impact from new large customer opt-outs under Section 8-104 (m-1)?:

*(m-1) For utilities that file an amended plan for the period covering calendar years 2027 through 2029, and for all utilities for all calendar years covered by a multi-year plan commencing on or after January 1, 2030, 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.*

- Similar to the electric side, regarding AIC's verbal mention of the desire to "remove the market rate furnace 'prohibition' after 2027" - which was negotiated and agreed to in Approved Plan 6 – the revised stipulation should only concentrate on provisions affected by the change in statute.

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# Thank you

