

**BEFORE THE PUBLIC SERVICE COMMISSION
OF THE STATE OF MISSOURI**

In the Matter of Union Electric Company) Case No GR-2019-0077
d/b/a Ameren Missouri's Tariffs to Increase) Tracking Nos. YG-2019-0112
Its Revenues for Natural Gas Service) YG-2019-0113

**PUBLIC COUNSEL'S MOTION THE COMMISSION REVISE ITS
ORDER TO ALLOW THE TRADITIONAL 30 DAY PERIOD FOR
INTERVENTIONS IN THIS CASE**

COMES NOW the Office of the Public Counsel (Public Counsel) and requests the Missouri Public Service Commission (Commission) revise its December 6, 2018 *Order Directing Notice, Setting Intervention Deadline, Directing Filing and Suspending*. In support of its Motion, Public Counsel states:

1. It is the practice of the Commission to grant a 30-day time period for intervention in cases such as this filing for a rate increase.
2. The Commission's Rule at 4 CSR 240-2.075 **Intervention** governs interventions and the first rule 4 CSR 240-2-2.075(1) states: "A motion of intervene or add new member(s) shall be filed within thirty (30) days after the commission issues its order giving notice of the case, unless otherwise ordered by the Commission."
3. In this case, in contrast to the usual 30 day intervention period, the Commission ordered, without explanation an 11 day intervention period (December 6, 2018 to December 17, 2018).

4. The Commission has suspended Ameren Gas' proposed revised tariff sheets, filed on which Ameren Gas filed to increase its rates for the usual time period, until November 2, 2019.

5. The Commission directed its "Data Center to serve a copy of this order upon the county commission of the counties in Ameren Missouri's service area and to the members of the General Assembly representing those areas. Even with the Data Center acting expeditiously, as Public Counsel would expect, it is possible some of these entities did not receive notice until December 11 or 12.

6. In the filings, there is no indication of any need to shorten the intervention period from 30 days to eleven days.

7. Public Counsel has received at least one comment that this shortened intervention date may deprive certain customers of the necessary notice in order to file by December 17. The editor of the Owensville newspaper emailed OPC indicating he had received the press release on the afternoon of December 7. The next newspaper, however, will be mailed on December 12, and "many of our readers won't see their mailed newspaper until Dec. 13. The editor noted that it '[j]ust seems like these deadlines are shorter and shorter from the time they are announced.'" See attached email.

8. Public Counsel reviewed the filings and did not see any request for expediting requests for intervention.

WHEREFORE Public Counsel requests the Commission issue its Order directing an intervention deadline of 30 days after its Notice of the case.

Respectfully submitted,

OFFICE OF THE PUBLIC COUNSEL

BY: /s/ Lera L. Shemwell

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CERTIFICATE OF SERVICE

I hereby certify that copies of the foregoing have been mailed, emailed or hand-delivered to all counsel of record this 13th day of December 2018.

/s/Lera L. Shemwell

From: Dave <dmarner@wardpub.com>
Sent: Friday, December 07, 2018 4:24 PM
To: OPC Service <OPCSERVICE@ded.mo.gov>; pscinfo@psc.mo.gov
Subject: Ameren Natural Gas (Case No. GR-2019-0077)

To whom it may concern:

As a newspaper editor in a small, rural community (Owensville) with Ameren Missouri natural gas (I am also a residential customer of both Ameren gas and electric), I really only have trouble with this notice of intervention deadline being so short.

We received this press release on Friday afternoon (Dec. 7) and won't print a newspaper until Wednesday, Dec. 12.

Your intervention deadline is Dec. 17. Not much time especially considering many of our readers won't see their mailed newspaper until Dec. 13.

Just seems like these deadlines are shorter and shorter from the time they are announced. Although I know your staff does a good job getting this information out to media outlets, Ameren requested the case on Dec. 3. Perhaps there should be more time for intervention requests. Maybe you don't receive many requests to intervene?

As a residential customer, I'm certainly not a fan of rate increases especially since we just received a reduction as previously announced.

Put me, personally, put me down as opposed to any increase at this time.

Professionally, I'd just like to see more lead time on these announcements so our readers (Ameren's customers) can be better informed in a more timely manner.

We do run these announcements regularly since Owensville sold its electric distribution system to Ameren in 2012. We also have the Maries County Advocate (Belle, Bland, Vienna) and the Unterrified Democrat (Linn, Osage County) in our newspaper holdings. We are following the PSC rulings and run them regularly.

Thanks for your time,
Dave Marner, managing editor, The Gasconade County Republican
573-437-2323