

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

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

**STAFF RESPONSE AND COUNTER-SUGGESTIONS TO PUBLIC COUNSEL'S  
SUGGESTIONS REGARDING LOCATIONS FOR LOCAL PUBLIC HEARINGS**

**COMES NOW** the Staff of the Missouri Public Service Commission, by and through counsel, and for its response to Office of Public Counsel's (OPC) January 3, 2019 filing suggesting locations for local public hearings (LPH), states as follows:

1        OPC has suggested that LPHs be held in the same locations as were held in Ameren Missouri Gas' last general rate case proceeding, Case. No. GR-2010-0363, filed June 11, 2010:

- Wentzville
- Columbia
- Jefferson City
- Mexico
- Cape Girardeau
- Rolla

2.        Staff respectfully disagrees with OPC's location suggestions and points out the following:

a).       Based on the attendance statistics tracked by Staff in Ameren Missouri Gas' last rate case, the low attendance at these locations do not support holding five LPHs:

11/22/10 Cape Girardeau	0 attendance
11/24/10 Wentzville	0 attendance
11/29/10 Columbia	4 attendance
11/30/10 Jefferson City	3 attendance
12/1/10 Mexico	9 attendance

b). Unlike the situation leading up to the 2010 LPHs, Ameren Missouri Gas customers are experiencing lower natural gas prices and recently received, as of January 1, 2019, a rate reduction due to the Federal Tax Cut and Jobs Act. Further, Staff is not aware of any reason why LPH attendance in 2019 would increase from the 2010 experience.

3. In fiscal year 2018, the average PSC Expense and Equipment cost per local public hearing was \$618, the average cost per attendee was \$17.84, and the average cost per witness was \$75.75. This does not include personal service expenditures, or the costs incurred by the companies or other parties that attended.

4. Recognizing the lack of attendance at the 2010 LPHs and the recent rate reduction for customers, Staff suggests that the Commission hold one LPH in either Mexico or Jefferson City. Should the Commission determine that a second LPH is warranted, Staff suggests it be held in Cape Girardeau.

**WHEREFORE**, for the reasons stated above, the Staff offers its counter-suggestions for consideration of the parties.

Respectfully submitted,

**/s/ Robert S. Berlin**

Robert S. Berlin  
Deputy Staff Counsel  
Missouri Bar No. 51709  
Attorney for the Staff of the  
Missouri Public Service Commission  
P. O. Box 360  
Jefferson City, MO 65102  
(573) 526-7779 (Telephone)  
(573) 751-9285 (Fax)  
Email: [bob.berlin@psc.mo.gov](mailto:bob.berlin@psc.mo.gov)

**CERTIFICATE OF SERVICE**

I hereby certify that copies of the foregoing have been mailed, hand-delivered, or transmitted by facsimile or electronic mail to counsel of record this 4<sup>th</sup> day of January, 2019.

**/s/ Robert S. Berlin**