

Exhibit No.:
Issue(s): Paperless Billing Program
Witness: Contessa King
Sponsoring Party: MoPSC Staff
Type of Exhibit: Direct Testimony
Case No.: ER-2022-0337
Date Testimony Prepared: January 24, 2023

MISSOURI PUBLIC SERVICE COMMISSION
FINANCIAL AND BUSINESS ANALYSIS DIVISION
CUSTOMER EXPERIENCE DEPARTMENT

DIRECT TESTIMONY
Class Cost of Service/Rate Design
OF
CONTESSA KING

UNION ELECTRIC COMPANY,
d/b/a AMEREN MISSOURI

CASE NO. ER-2022-0337

Jefferson City, Missouri
January 2023

1 **DIRECT TESTIMONY OF**

2 **CONTESSA KING**

3 **UNION ELECTRIC COMPANY,**
4 **d/b/a AMEREN MISSOURI**

5 **CASE NO. ER-2022-0337**

6 Q. Please state your name and business address.

7 A. My name is Contessa King. My business address is 200 Madison Street,
8 Jefferson City, Missouri 65101.

9 Q. By whom are you employed and in what capacity?

10 A. I am employed by the Missouri Public Service Commission (“Commission”)
11 as the Manager of the Customer Experience Department, Financial and Business
12 Analysis Division.

13 Q. Please describe your background and relevant work experience.

14 A. I started employment with the Missouri Public Service Commission in
15 January 2002 and have served in various capacities during my tenure at the Commission. I have
16 completed numerous internal and external trainings including the Center for Public Utilities
17 regulatory training at New Mexico State University. For a complete list of previous titles and
18 education, my credentials are attached to my testimony as Schedule CK-d1.

19 Q. What is the purpose of this direct testimony?

20 A. The purpose of this direct testimony is to address Ameren Missouri’s request to
21 cease enrollment of the Paperless Billing credit at the conclusion of this proceeding.¹ I will
22 also address Ameren Missouri’s efforts to increase paperless billing adoption by implementing
23 a pre-checked paperless enrollment box to online and mobile transactions.

¹ ER-2022-0337, Direct Testimony of Michael W. Harding, page 13, lines 3-4.

Direct Testimony of
Contessa King

1 Q. Briefly explain Ameren Missouri's Paperless Billing credit program.

2 A. In an attempt to encourage customer participation in paperless billing, also
3 referred to as electronic billing (e-bill), Ameren Missouri implemented a paperless bill credit
4 for new enrollees. The Paperless Billing credit initiative provides a \$0.50 credit, per bill, not
5 to exceed a one-year period. The incentive took effect on April 1, 2020, for residential
6 customers enrolling in paperless billing for the first time. The Paperless Billing credit was
7 implemented as proposed by Ameren Missouri's Witness Mark C. Birk's direct testimony in
8 Case No. ER-2019-0335.²

9 Q. Can you speak to how Ameren Missouri intends to end the Paperless Billing
10 credit?

11 A. Subject to Commission approval, the proposed plan is to phase out the \$0.50 per
12 month bill credit. According to Ameren Missouri's response to Staff Data Request (DR)
13 No. 0297 and the direct testimony of Mr. Harding, Ameren Missouri would like to stop the
14 current paperless bill credit in 2023. In the interim, Ameren Missouri will continue to provide
15 the credit to customers who have already enrolled in the program but have not received the full
16 12 months of credit.

17 Q. Does Staff support Ameren Missouri's proposal to discontinue the Paperless Bill
18 credit program?

19 A. Yes, Staff supports the discontinuance of the Paperless Bill credit program given
20 the incentive did not produce the desired outcome. According to Ameren Missouri, all of its
21 combined efforts to increase paperless billing, along with organic customer adoption, have

² ER-2019-0335, *Corrected Non-Unanimous Stipulation and Agreement*, paragraph 47, filed March 2, 2020. Approved by the Commission on March 18, 2020, *Order Approving Stipulation and Agreements*.

1 resulted in an average year over year increase in paperless billing of 2.91% since 2018. Ameren
2 Missouri further states that there is no evidence to support the impact the bill credit has on
3 increased adoption. In fact, the paperless bill adoption rate declined after the bill credit went
4 into effect.³ Additionally, Ameren Missouri Witness Michael W. Harding states in his direct
5 testimony that *“To date, the Paperless Billing credit has not been as effective as originally
6 hoped at incenting customers to switch from paper bills to paperless billing.”*⁴

7 Q. Are you aware of other Staff that filed testimony regarding Ameren Missouri’s
8 Paperless Billing incentive program?

9 A. Yes. Staff member Karen Lyons, Utility Regulatory Manager from the Auditing
10 Department filed Cost of Service (COS) direct testimony concerning the treatment of costs
11 associated with the Paperless Billing credit initiative.

12 Q. Please list any recommendations you have concerning the proposed tariff
13 language associated with the phase out of the Paperless Billing credit.⁵

14 A. Staff does not have significant recommendations at this time. However, a
15 portion of the proposed tariff language states the following; *“Residential customers who enroll
16 in paperless billing for the first time prior to July 1, 2023, are not currently enrolled in
17 paperless billing, and have not received paperless billing in the past, will receive credit on their
18 monthly bill for a term not to exceed a one-year period.”* If the Commission approves the
19 discontinuance of the Paperless Billing credit program, Ameren will need to ensure that
20 compliance tariff language reflects the effective date of the new rates if new rates go into effect
21 after July 1, 2023.

³ Ameren Missouri’s response to Staff DR No. 0297.

⁴ ER-2022-0337, Direct Testimony of Michael W. Harding, page 13, lines 5-7.

⁵ Proposed Tariff Sheet No. 138, General Rules and Regulations Section V. Billing Practices.

1 Q. Does Staff have any other comments concerning Ameren Missouri's Paperless
2 Billing credit program?

3 A. No.

4 Q. Would Staff like to comment on other aspects of Ameren Missouri's efforts to
5 encourage more customers to enroll in Paperless Billing?

6 A. Yes. Staff would like to express its concerns regarding Ameren Missouri's
7 pre-checked enrollment box that paper bill customers must uncheck if they DO NOT want to
8 participate in paperless billing.

9 Q. Can you explain what you mean by a pre-checked paperless enrollment box?

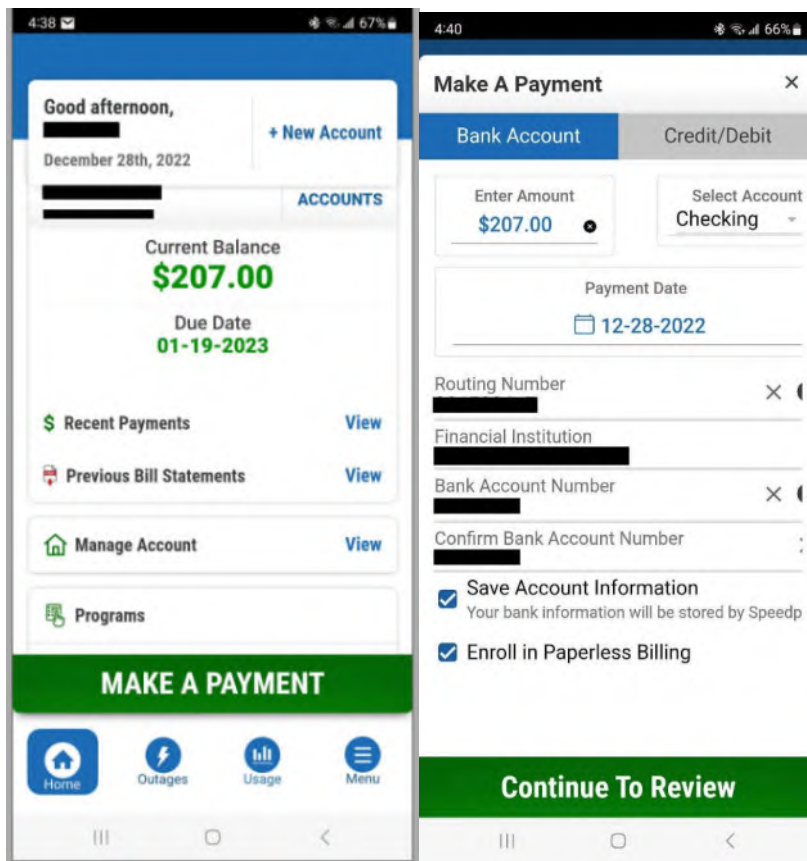
10 A. Ameren Missouri promotes its paperless billing option by utilizing a variety of
11 marketing strategies. Beginning in April 2022, in an effort to target customers choosing a
12 digital channel for self-service transactions (i.e. bill payment, Auto Pay enrollment,
13 start/transfer service) Ameren added a pre-checked paperless enrollment box to online and
14 mobile transactions.⁶ If customers notice the pre-checked box and understand the significance
15 of the pre-checked box, those wanting to enroll in paperless billing can leave the pre-checked
16 enrollment box checked to switch to paperless billing. Customers that do not wish to participate
17 in paperless billing must uncheck the box, essentially having to opt-out of participation.

18 Q. You mentioned that Staff has concerns with the pre-checked enrollment box.
19 Why the concern if customers can simply uncheck the box if they do not want to participate?

20 A. It is Staff's position that Ameren Missouri's customers should initiate
21 enrollment in paperless billing rather than Ameren Missouri pre-selecting enrollment for its
22 customers as an attempt to increase participation. It should be the customer's choice to check

⁶Staff DR No. 0298

1 the box for paperless billing participation instead of having to uncheck the box, especially when
2 customers are interacting with Ameren Missouri's website and Mobile App for purposes
3 unrelated to paperless billing enrollment. Additionally, as you can see in the screen shots⁷
4 below from Ameren Missouri's Mobile App (Android device), when making a payment on the
5 Mobile App a customer could easily overlook or misunderstand the pre-checked box and
6 inadvertently sign up to receive monthly bills electronically.



⁷ The images are screen shots of the first two screens presented when making a payment in Ameren Missouri's Mobile App, screenshots captured on December 28, 2022. Ameren Missouri's Mobile App was downloaded from Google Play.

1 Q. What other concerns do you have regarding Ameren Missouri pre-selecting the
2 enrollment box for its customers?

3 A. Ameren Missouri's research indicates that most Ameren Missouri customers
4 who receive paper bills are aware of paperless billing but have various reservations about
5 signing up.

6 As discussed in great detail in my rebuttal testimony in Case No. ER-2019-0335⁸ and
7 further validated in Ameren Missouri's 2022 study, *Paper Statement Fee Survey Analysis*⁹
8 (Schedule CK-d2), 96% of paper bill customers surveyed are aware of electronic billing options
9 but do not sign up for paperless billing because of a strong preference for a paper bill or because
10 they have concerns with technology. This data indicates to Staff that if customers wanted to
11 participate then they would sign up to participate of their own volition and, again, there is no
12 need for Ameren to pre-check the enrollment box.

13 The Paper Statement Fee Survey methodology indicates that the survey was conducted
14 using Ameren's *Your Voice* panel. There were 1,176 surveys completed. Of the surveyed
15 participants, 61% receive electronic bills and 39% receive paper bills. When paper billed
16 customers were asked what has prevented them from switching to an electronic version of the
17 bill, participants provided the following responses:

- 18 • 72% - Other (preference for paper/record keeping, don't want Ebill/lack
19 of trust in technology, afraid of losing bill in their email, poor internet
20 quality/no technology, no financial benefit),
- 21 • 10% - Finding the time to switch,
- 22 • 8% - Lack of internet access/poor service,
- 23 • 6% - Don't know how,
- 24 • 4% - Unaware Ameren offered electronic billing.

⁸Case No. ER-2019-0335, Rebuttal Testimony of Contessa King (Public and Confidential), EFIS Item No. 109.

⁹ Ameren Missouri's response to Staff DR No. 0299, Your Voice Panel Study between April 26 and May 6, 2022.

1 The complete aforementioned survey analysis is included with this testimony as
2 Schedule CK-d2.

3 Q. Since implementation, has the pre-checked enrollment box garnered any
4 feedback from Ameren Missouri customers?

5 A. Yes. In Staff DR No. 0298.1, Staff inquired about customer feedback.
6 According to Ameren Missouri, as of December 9, 2022, 143 customers had expressed
7 frustration with the pre-checked enrollment box, which Ameren Missouri states is less than 1%
8 of customers enrolled in paperless billing through this method. Ameren Missouri further states
9 that none of the 143 customers who expressed frustration with the pre-checked box wanted to
10 be enrolled in paperless billing; (Schedule CK-d3¹⁰) therefore, those customers switched back
11 to a paper bill. It is not clear to Staff if, prior to contacting Ameren Missouri, these frustrated
12 customers were under the impression that they did not receive a bill(s) since a billing statement
13 did not arrive in the mail as expected and as required per 20 CSR 4240-13.020 (1) Billing and
14 Payment Standards¹¹.

15 Q. Prior to filing this testimony, did Staff bring its concerns regarding the
16 pre-checked enrollment box to Ameren Missouri's attention?

17 A. In July 2022, a member of the Customer Experience Department contacted an
18 Ameren Missouri representative to inquire about the pre-checked enrollment box. In response
19 to Staff's inquiry, the Ameren Missouri representative advised Staff that Ameren Missouri did
20 not have plans to change the process from a pre-checked to an unchecked box; however,
21 Ameren Missouri was willing to approve the website design to better communicate the

¹⁰ Ameren Missouri's response to Staff DR No. 0298.1.

¹¹ 4240-13.020 (1) A utility shall render a bill for each billing period to every residential customer according with commission rules and its approved tariff.

1 paperless billing option for customers interacting with the website. In November 2022, Ameren
2 Missouri changed the verbiage and placement of the enrollment box on its website to make it
3 more obvious to customers that they must uncheck the box if they do not want to enroll in
4 paperless billing.

5 Q. Is Staff against utility companies offering electronic billing options to
6 customers?

7 A. Absolutely not. If a Commission regulated utility wants to offer paperless
8 billing to its customers, Staff supports providing billing options in a transparent manner in
9 accordance with Commission billing rules, other relevant rules and company tariffs. However,
10 the onus to enroll in paperless billings should always be on the customer.

11 Q. Based on Staff's review of Ameren Missouri's paperless billing research
12 projects and based on Ameren Missouri's response to Staff DR Nos. 0298 and 0298.1, does
13 Staff have any recommendations?

14 A. Yes. Staff recommends that for an improved customer experience Ameren
15 Missouri should stop the practice of pre-checking the enrollment box and allow customers to
16 voluntarily check the box for paperless billing enrollment, if interested. This approach would
17 help ensure that customers interacting with Ameren Missouri's website and Mobile App do not
18 inadvertently request electronic bills.

19 Q. Does this conclude your direct testimony?

20 A. Yes it does.

BEFORE THE PUBLIC SERVICE COMMISSION

OF THE STATE OF MISSOURI

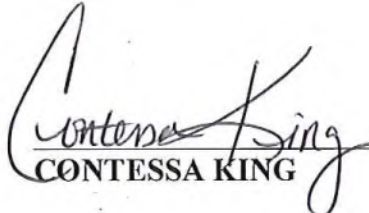
In the Matter of Union Electric Company)
d/b/a Ameren Missouri's Tariffs to Adjust)
Its Revenues for Electric Service) Case No. ER-2022-0337

AFFIDAVIT OF CONTESSA KING

STATE OF MISSOURI)
) ss.
COUNTY OF COLE)

COMES NOW CONTESSA KING and on her oath declares that she is of sound mind and lawful age; that she contributed to the foregoing *Direct Testimony of Contessa King*; and that the same is true and correct according to her best knowledge and belief.

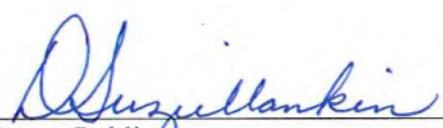
Further the Affiant sayeth not.


_____ **CONTESSA KING**

JURAT

Subscribed and sworn before me, a duly constituted and authorized Notary Public, in and for the County of Cole, State of Missouri, at my office in Jefferson City, on this 20th day of January 2023.

D. SUZIE MANKIN
Notary Public - Notary Seal
State of Missouri
Commissioned for Cole County
My Commission Expires: April 04, 2025
Commission Number: 12412070


_____ **Notary Public**

Contessa King
Customer Experience Department
Financial and Business Analysis Division

Professional Experience:

*Regulatory Compliance Manager, Financial and Business Analysis Division & Staff Division
(November 2017-present)*

Outreach and Diversity Officer, Administration (2015-2017)

Consumer Outreach Coordinator, Administration (2013-2015)

Utility Policy Analyst I, Operations (2012-2013)

Consumer Services Coordinator/Assistant Manager, Administration & Staff Counsel (2007-2012)

Consumer Services Specialist II, Administration (2005-2007)

Senior Office Support Assistant, Adjudication (2002-2005)

Missouri Secretary of State's Office, Corporations Unit (2000-2002)

KMIZ TV - FOX 11, Benedek Broadcasting Company (1994-2000)

I graduated from the University of Missouri-Columbia with a Bachelor of General Studies (a multidisciplinary degree) areas of study: Communications, Mass Communications and Humanities. In October 2011, I attended the Center for Public Utilities regulatory training at New Mexico State University.

Participant in the first, second, and fourth partnership exchange between the Commission and the National Energy Regulatory Agency of Moldova (ANRE), traveled to Chisinau, Moldova June 2010. Contributions include a two-part presentation on consumer affairs, trained ANRE delegates, assisted with the re-engineering of the Commission's Electronic Filing Information System (EFIS) capability, developed a new workflow procedure for ANRE's petitions/complaints process and assisted with partnership coordination efforts. Partnership supported by National Association of Regulatory Utility Commissioners (NARUC) and the United States Agency for International Development (USAID).

Selected to participate in a partnership exchange between NARUC and the Nigerian Electric Regulatory Commission (NERC); traveled to Abuja, Nigeria October 2012 (partnership exchange supported by USAID). Invited to participate in a partnership exchange between NARUC and the Kenya Energy Regulatory Commission (ERC); traveled to Nairobi, Kenya May 2016 (partnership exchange supported by USAID and Power Africa).

Case Participation:

The following is a listing of cases before the Commission in which I provided testimony, Staff recommendation(s) or significant analysis:

**Contessa King
Case Participation**

Date Filed in EFIS	Case Number	Company Name – Type of Case	Contribution
2/21/2021	AO-2021-0264	Cause of the February 2021 Cold Weather Event and its Impact on Investor Owned Utilities	Staff Report
5/11/2020	AW-2020-0356	Working Case to Consider Best Practices for Recovery of Past-Due Utility Customer Payments After the Covid-19 Pandemic Emergency	Staff Report
11/25/2019	AW-2020-0148	Working Case to Reconsider a Proposed Residential Customer Disconnection Data Reporting Rule	Analysis
6/14/2017	AW-2017-0336	General Review of Commission Rules	Analysis
6/27/2018	AW-2018-0393	Working Case for the Writing of a New Rule on the Treatment of Customer Information by Regulated Utilities and Their Affiliates and Nonaffiliates	Analysis
2/9/2011	AW-2011-0252	Working File to Consider Changes to Chapter 13 Service and Billing Practice Rules	Analysis
11/30/2022	AX-2023-0175	Proposed Rulemaking to Promulgate a New Rule Regarding a Residential Customer Disconnection Data Reporting Rule	Analysis
9/18/2019	AX-2020-0076	Proposed Rule Regarding the Treatment of Customer Information by Commission Regulated Utilities	Analysis
11/9/2018	AX-2018-0395	Proposed Revisions to Improve the Commission's Rules (Chapter 13 Rules)	Analysis
8/29/2012	AX-2013-0091	Proposed Rulemaking to Amend 4 CSR 240-13 Service and Billing Practices for Residential Customers	Analysis
8/20/2009	AX-2010-0061	Public Counsel's Petition for Promulgation of Rules Relating to Billing and Payment Standards for Residential Customers	Analysis
11/12/2012	CA-2013-0271	New Horizons Communications Corp. - Application for Certificate	Staff Recommendation
5/9/2013	CA-2013-0492	Giant Communications, Inc. - Application for Certificate	Staff Recommendation
6/28/2013	CA-2013-0548	FidelityLink, LLC - Application for Certificate	Staff Recommendation
7/30/2013	CO-2014-0025	Metropolitan Telecommunications of Missouri, Inc. – Application to Expand Certificate of Basic Local Service Authority	Staff Recommendation

**Contessa King
Case Participation**

Date Filed in EFIS	Case Number	Company Name – Type of Case	Contribution
1/18/2019	EC-2019-0168	Jill Covington Beatty v. Ameren Missouri - Complaint Case	Staff Report and Testimony
10/31/2017	EC-2018-0113	Anthony R. Granillo v. Ameren Missouri - Complaint Case	Analysis
6/17/2022	EE-2022-0071	Evergy Metro, Inc. d/b/a Evergy Missouri Metro and Evergy Missouri West, Inc. d/b/a Evergy Missouri West Request for a Waiver of Various Tariffs and Regulations Related to Automated Metering Infrastructure (AMI)	Analysis
10/02/2019	EE-2019-0382	Ameren Missouri's Request for a Waiver to Various Tariffs and Regulation to Enable the Deployment of Automated Metering Infrastructure (AMI) Beginning in 2020	Analysis
1/12/2018	EM-2018-0012	Application of Great Plains Energy Incorporated for Approval of its Merger with Westar Energy, Inc.	Analysis
8/6/2020	EO-2021-0032	An Agreement Between Evergy, Inc., and Elliott Management, Inc.	Staff Report
11/6/2018	EO-2019-0132 EO-2019-0133	Kansas City Power & Light Company's Notice of Intent to File an Application for Authority to Establish a Demand-Side Programs Investment Mechanism	Analysis
8/25/2014	EO-2015-0055	Ameren Missouri's 2nd Filing to Implement Regulatory Changes in Furtherance of Energy Efficiency as Allowed by MEEIA - Flex Pay Application Filed 11/30/2017	Analysis
7/13/2022	ER-2022-0129	Evergy Metro, Inc. d/b/a Evergy Missouri Metro - General Rate Increase	Rebuttal Testimony
7/13/2022	ER-2022-0130	Evergy Missouri West, Inc. d/b/a Evergy Missouri West - General Rate Increase	Rebuttal Testimony
5/28/2021	ER-2021-0312	The Empire District Electric Company d/b/a Liberty – General Rate Case	Direct – Cost of Service Staff Report, Rebuttal
7/3/2019	ER-2019-0335	Union Electric Company d/b/a Ameren Missouri – General Rate Case	Direct – Class Cost of Service Staff Report, Rebuttal
6/18/2018	ER-2018-0145	Kansas City Power & Light Company - General Rate Case	Direct – Cost of Service Staff Report
6/18/2018	ER-2018-0146	KCP&L Greater Missouri Operations Company - General Rate Case	Direct – Cost of Service Staff Report

**Contessa King
Case Participation**

Date Filed in EFIS	Case Number	Company Name – Type of Case	Contribution
12/1/2011	ER-2012-0174	Kansas City Power & Light Company - General Rate Case	Direct, Rebuttal, Surrebuttal
12/1/2011	ER-2012-0175	KCP&L Greater Missouri Operations Company - General Rate Case	Direct, Rebuttal, Surrebuttal
9/21/2020	ET-2021-0082	Union Electric Company d/b/a Ameren Missouri for Approval of its Surge Protection Program	Staff Report
8/6/2012	EW-2013-0045 GW-2013-0046 WW-2013-0047	Working Case (Consolidated) to Consider the Establishment of a Low-Income Customer Class or Other Means to Help Make Utility Services Affordable	Analysis
12/5/2019	GC-2020-0057	William L. Hackney & Catrina Hackney v. Spire – Complaint Case	Analysis
6/15/2018	GC-2018-0377	Imri Meiron v. Spire - Complaint Case	Analysis
12/6/2017	GC-2018-0159	Lisa Lambert v. Spire - Complaint Case	Analysis
1/22/2013	GC-2013-0361	William Wehrle v. Laclede Gas Company – Complaint Case	Analysis
2/2/2006	GC-2006-0318	Staff v. Laclede Gas Company - Complaint Case	Analysis
1/21/2022	GO-2022-0022	Staff's Investigation of Spire STL Pipeline's Application at FERC for a Temporary Certificate to Operate	Staff Report
3/16/2018	GO-2018-0251	Investigation of Customer Service Issues at Spire Missouri, Inc.	Staff Report
1/17/2018	GO-2018-0195	Investigation into the Interruption Of Summit's Gas Deliveries in the Lebanon, Missouri Region	Analysis
1/24/2022	GR-2021-0320	The Empire District Gas Company d/b/a Liberty – General Rate Case	Direct – Cost of Service
4/13/2018	GR-2018-0013	Liberty Utilities (Misstates Natural Gas) Corp. d/b/a Liberty Utilities – General Rate Case	Analysis
1/24/2013	TA-2013-0363	Matrix Telecom, Inc. d/b/a VarTec Telecom – Application for Certificate	Staff Recommendation
1/24/2013	TA-2013-0364	Matrix Telecom, Inc. d/b/a Excel Telecommunications – Application for Certificate	Staff Recommendation
4/23/2013	TA-2013-0464	TNCI Operating Company LLC – Application for Certificate	Staff Recommendation
9/24/2013	TA-2014-0083	Angel Americas, LLC – Application for Certificate	Staff Recommendation
11/15/2012	TD-2013-0275	360networks (USA), Inc. - Cancellation of Certificate of Service Authority	Staff Recommendation

**Contessa King
Case Participation**

Date Filed in EFIS	Case Number	Company Name – Type of Case	Contribution
11/15/2012	TD-2013-0276	AboveNet Communications, Inc. - Cancellation of Certificate of Service Authority	Staff Recommendation
7/8/2019	WC-2019-0324	Cordney Jack Travis v. Missouri-American Water Company – Complaint Case	Analysis
3/3/2006	WC-2006-0345	Dione C. Joyner v. Missouri-American Water Company - Complaint Case	Staff Recommendation
12/15/2017	WR-2018-0170 SR-2018-0171	Liberty Utilities (Missouri Water) - Small Utility Rate Case	Analysis

Ameren Missouri's
Response to MPSC Data Request - MPSC
ER-2022-0337

In the Matter of Union Electric Company d/b/a Ameren Missouri's Tariffs to Adjust Its Revenues
for Electric Service

No.: MPSC 0299

Has Ameren or Ameren Missouri had any current surveys or research studies conducted regarding participation in paperless billing? If yes, please provide complete copies of the surveys/studies and, if applicable, advise of what changes the Company implemented because of the research findings. DR requested by (Karen.lyons@psc.mo.gov <<mailto:Karen.lyons@psc.mo.gov>>).

RESPONSE

Prepared By: Kristy Lovett
Title: Sr. Mgr. Customer Solutions & Strategy
Date: 10.12.22

Ameren Missouri has conducted four research projects regarding paperless billing since 2019:

1. Paperless research re: awareness, interest, reasons for enrolling/un-enrolling, and assessing different messaging options – 2019
 - a. Changes implemented as a result: selection of a new customer-facing messaging campaign to drive enrollment in paperless billing; decision re: which incentives to include in that campaign; exploration of bundling some existing billing notifications with the paperless bill to improve the overall paperless experience
2. Your Voice survey to help Digital Billing & Payment team determine how to bundle paperless and billing alerts – 2020
 - a. Changes implemented as a result: developed an email campaign that bundled relevant billing notifications into the one-click paperless enrollment to provide a better overall paperless experience
3. Your Voice survey to assess the current bill credit against other potential incentive options – 2020
 - a. Changes implemented as a result: none – results indicated that we did not need to pursue alternate incentive options at this time
4. Your Voice study to understand reasons customers have not switched from a paper to paperless bill, and how customer behavior changes when companies charge for a paper bill – 2022
 - a. Changes implemented as a result: none. The research validated our current direction.



Paper Statement Fee Survey Analysis



METHODOLOGY

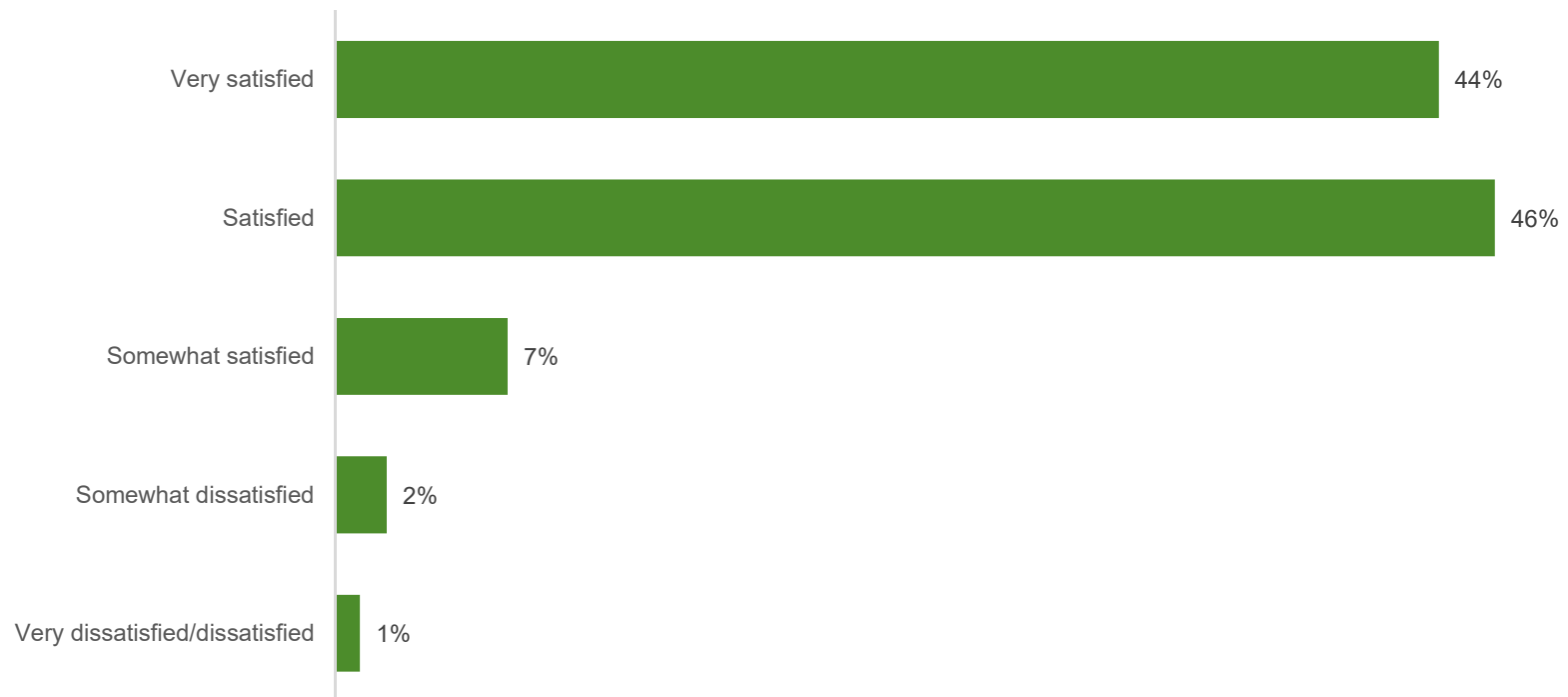
Objectives of the survey was to understand the likeliness of customers on paper billing to switch to electronic billing if a paper bill charge was introduced.

Survey Methodology

- The survey was fielded using the Your Voice Panel
- The survey was fielded between 26th of April and May 6th
- An email invitation was sent to 4701 panel members
- 1176 surveys were finished giving a 25% response rate

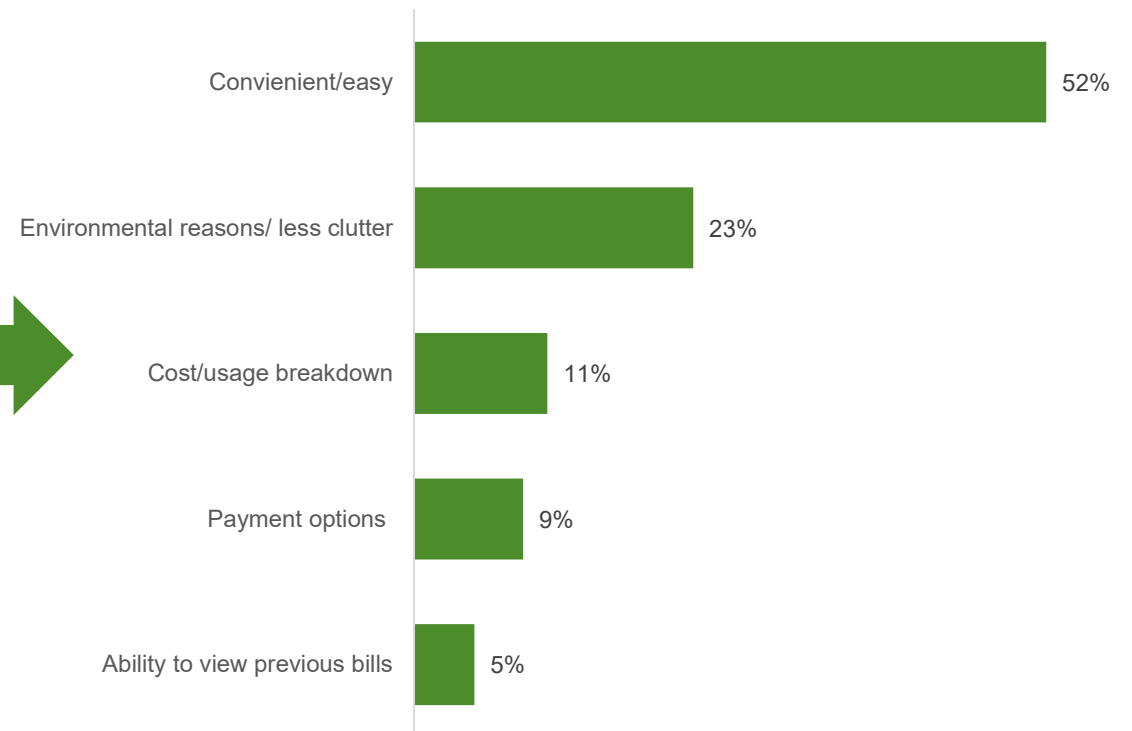
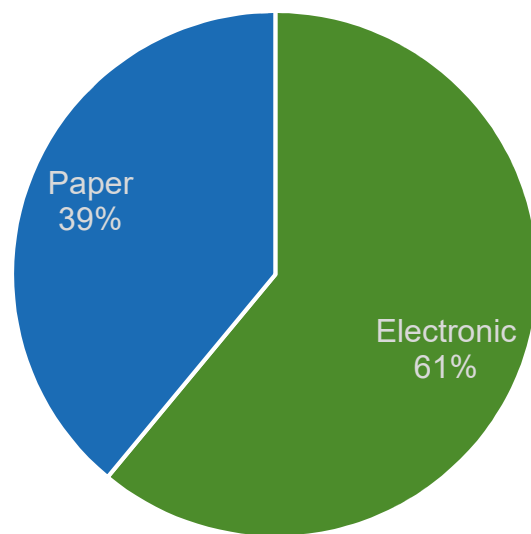
Overall satisfaction with Ameren Missouri

All participants



How receive bill and what like about electronic billing

All survey participants & electronic bill customers

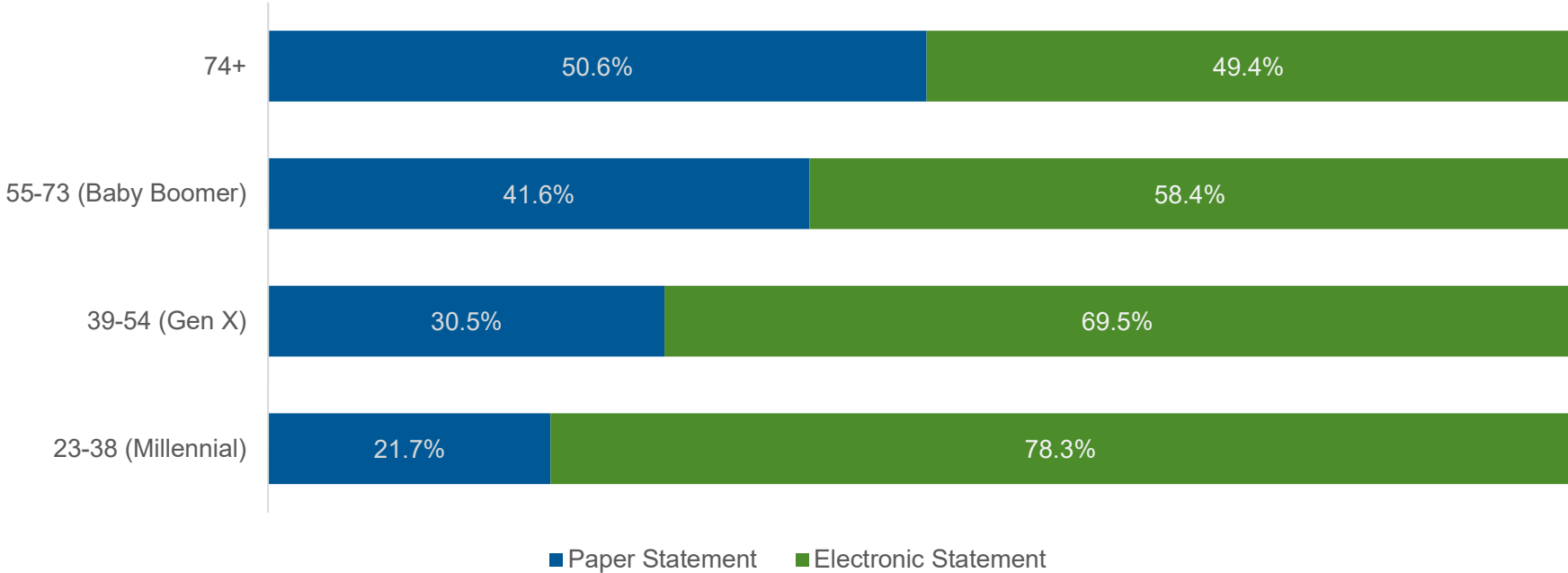




How currently receive Ameren bill

All participants

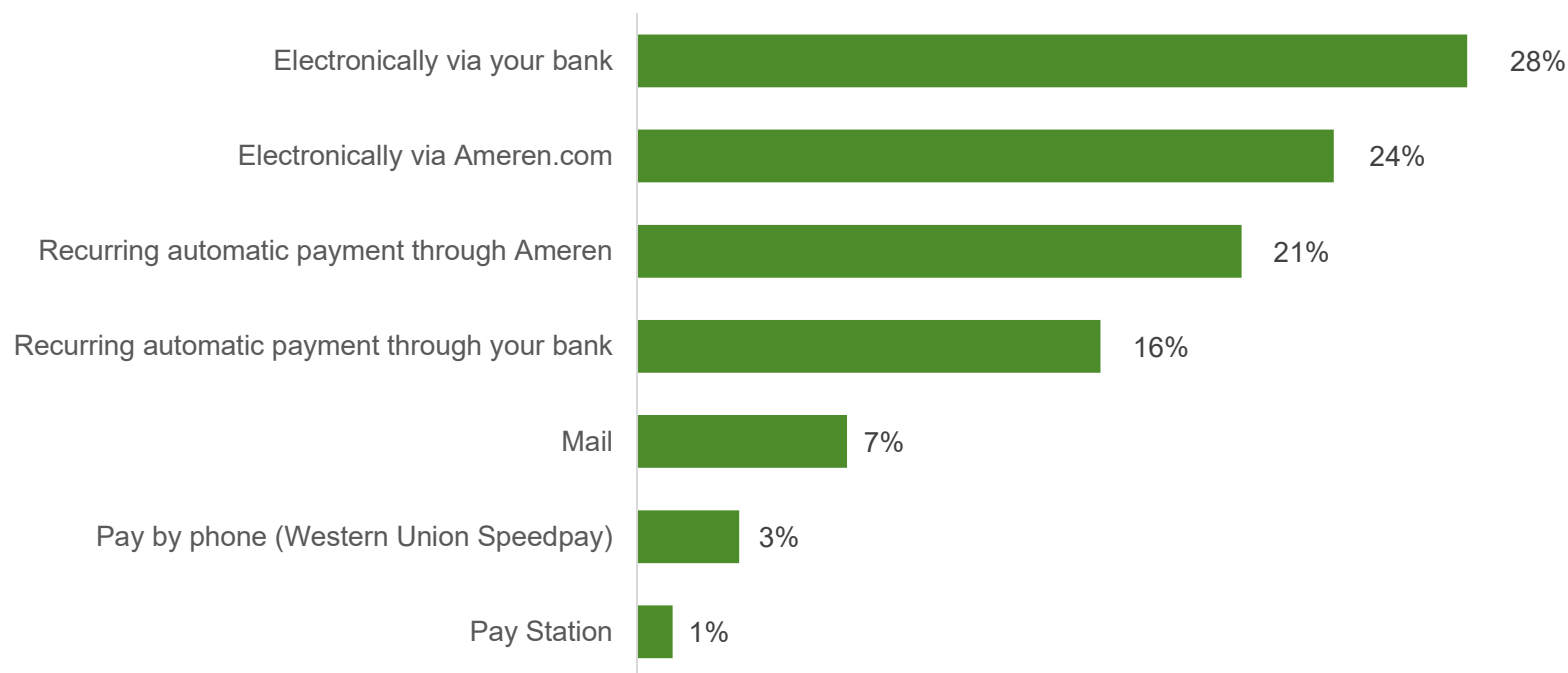
Age Breakdown





How usually pay Ameren bill

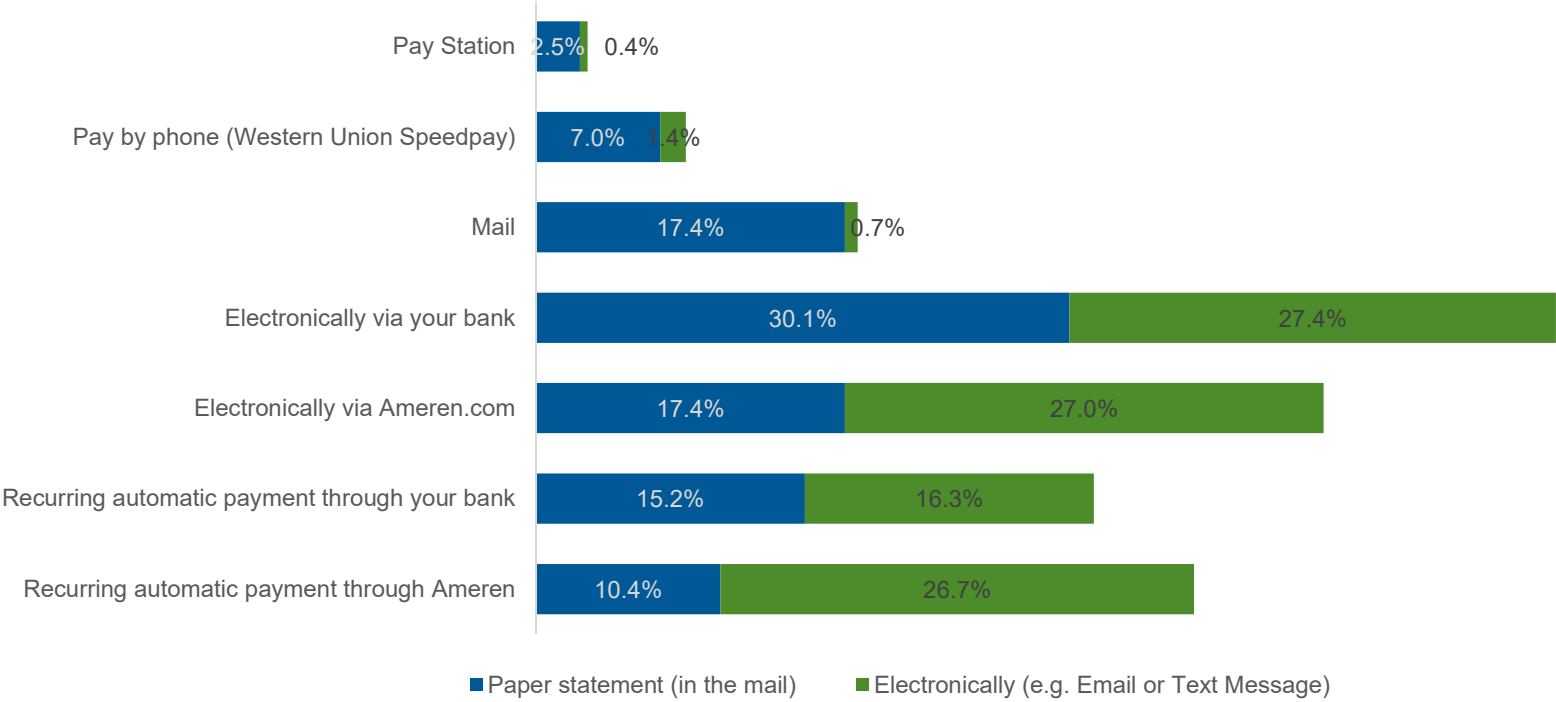
All participants





How do you usually pay your Ameren bill vs how you receive your bill

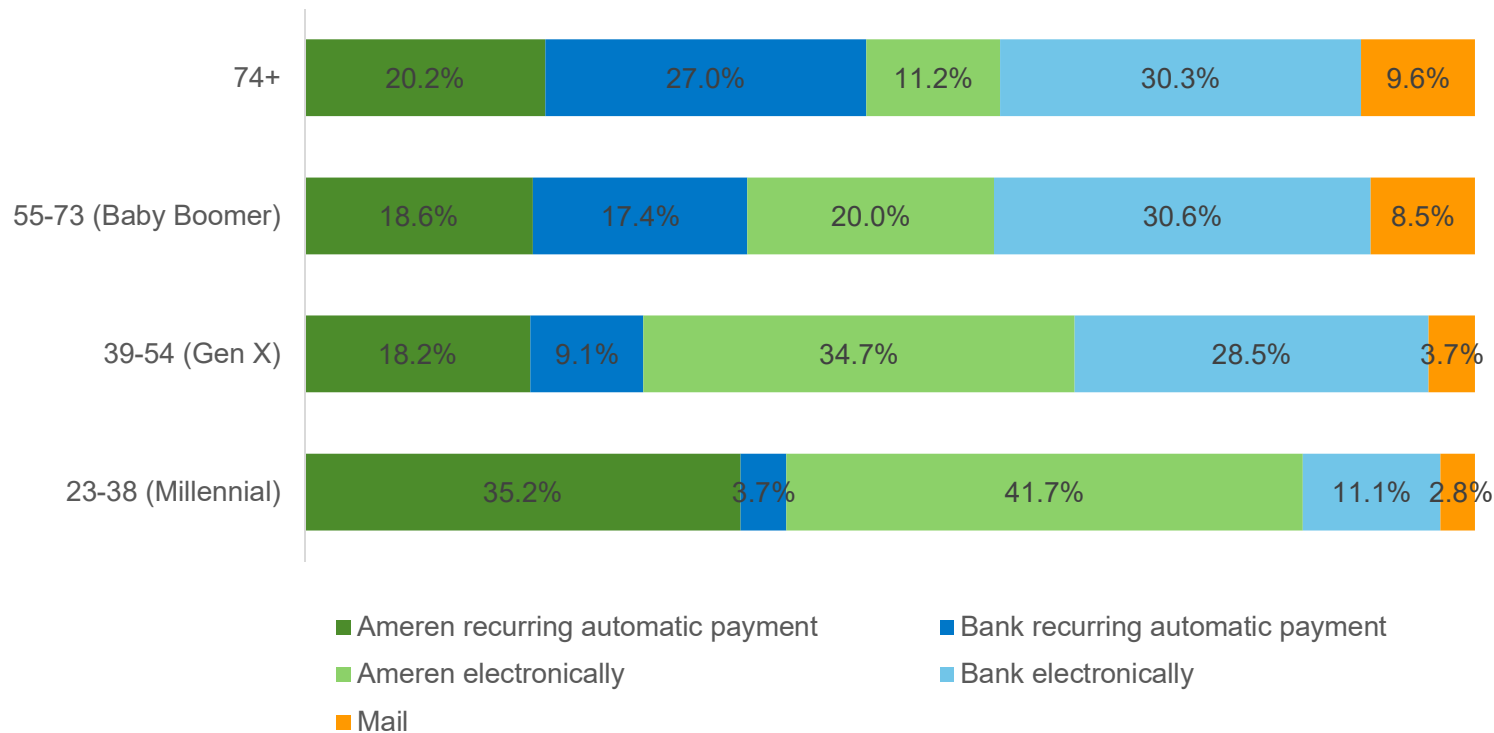
All participants





How usually pay Ameren bill

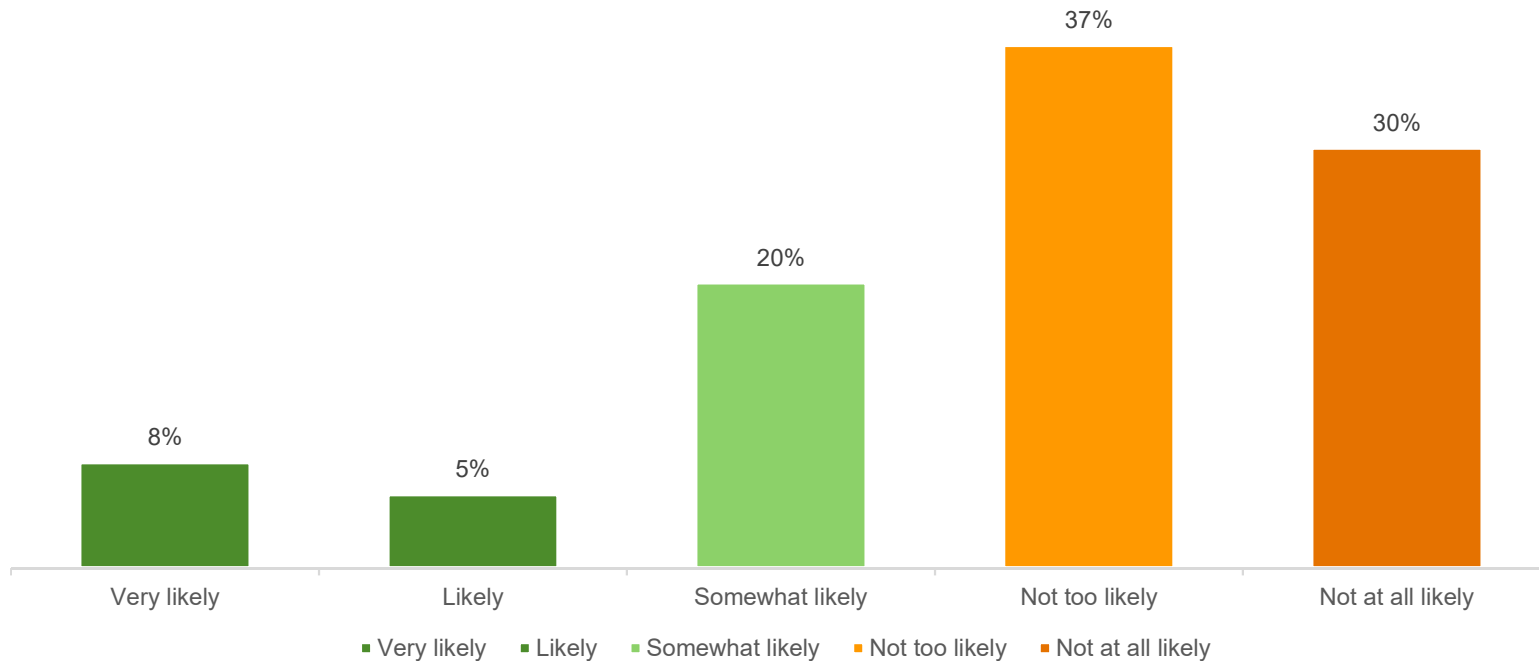
Age Breakdown



Likelihood to switch to an electronic version of your bill within the next year

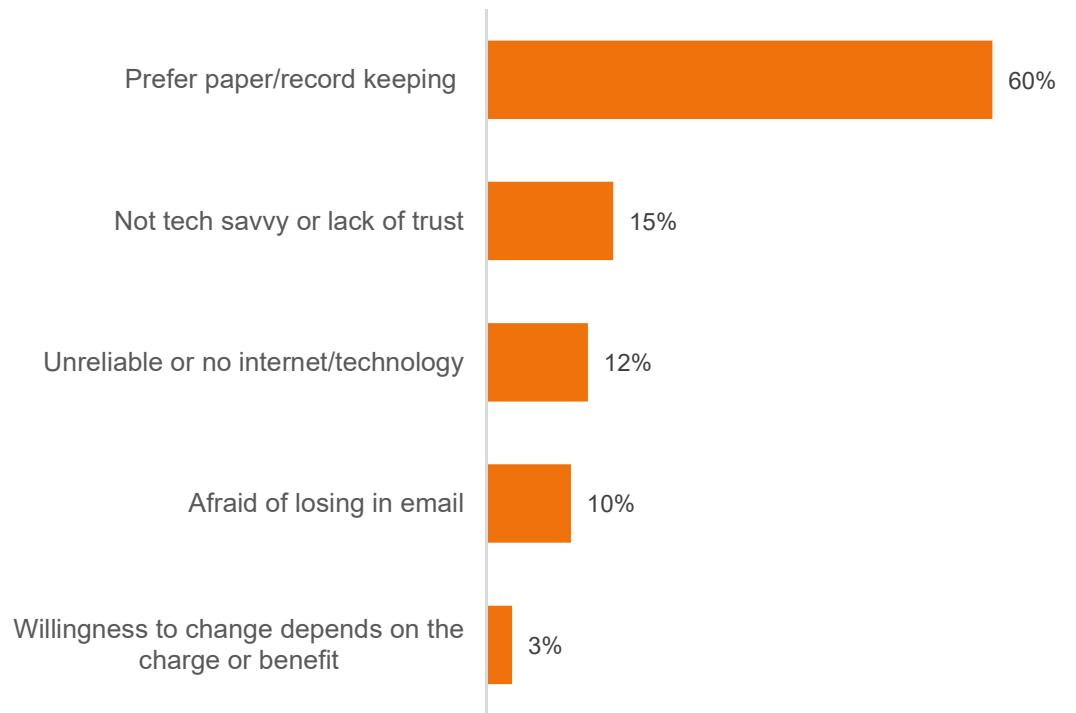
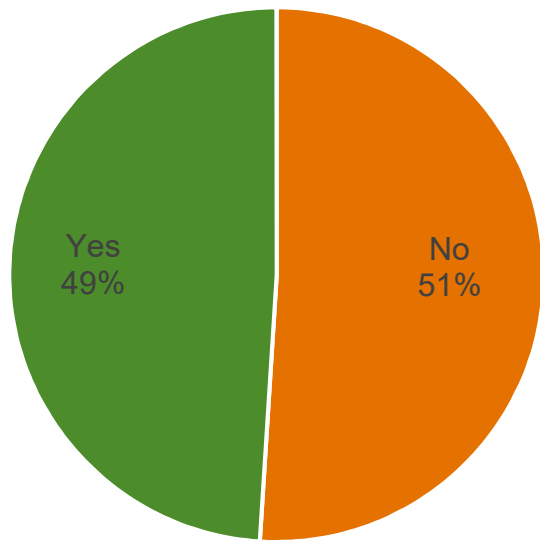


Paper bill customers



Willingness to switch to electronic billing if charged to receive your paper statement

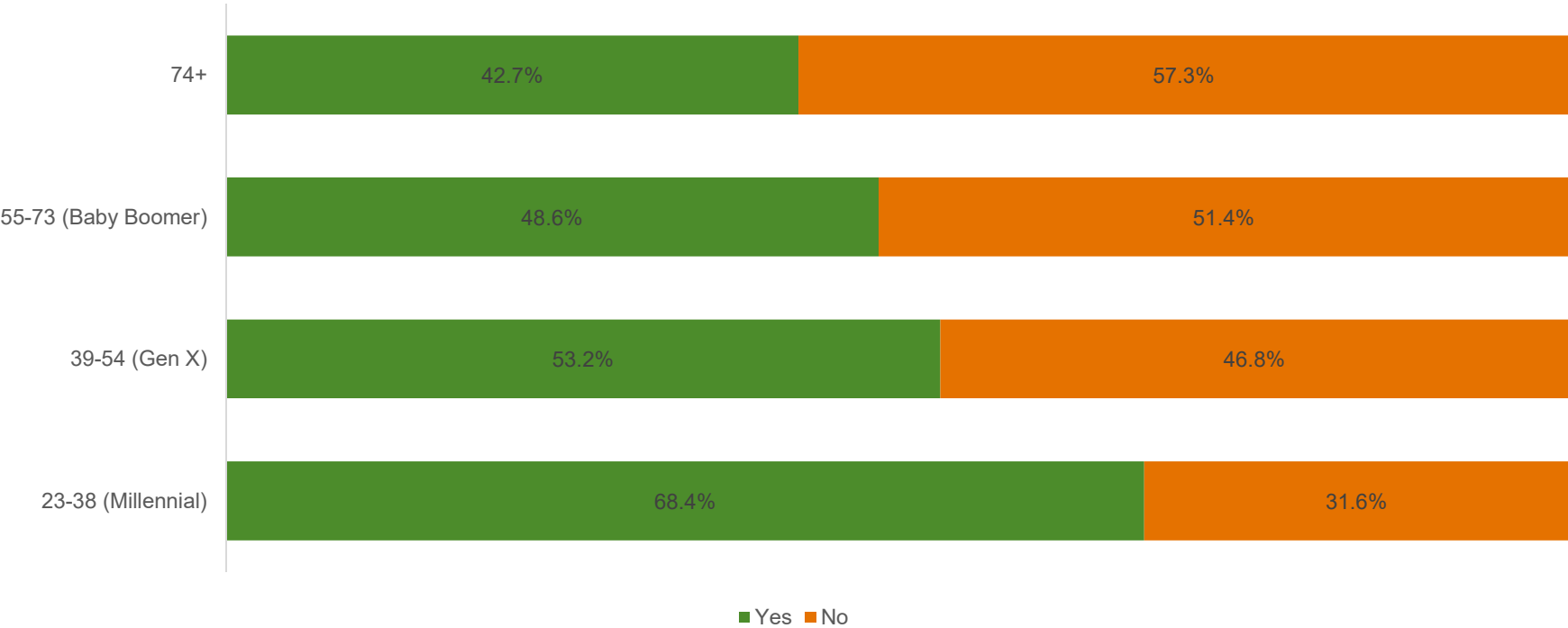
Paper bill customers





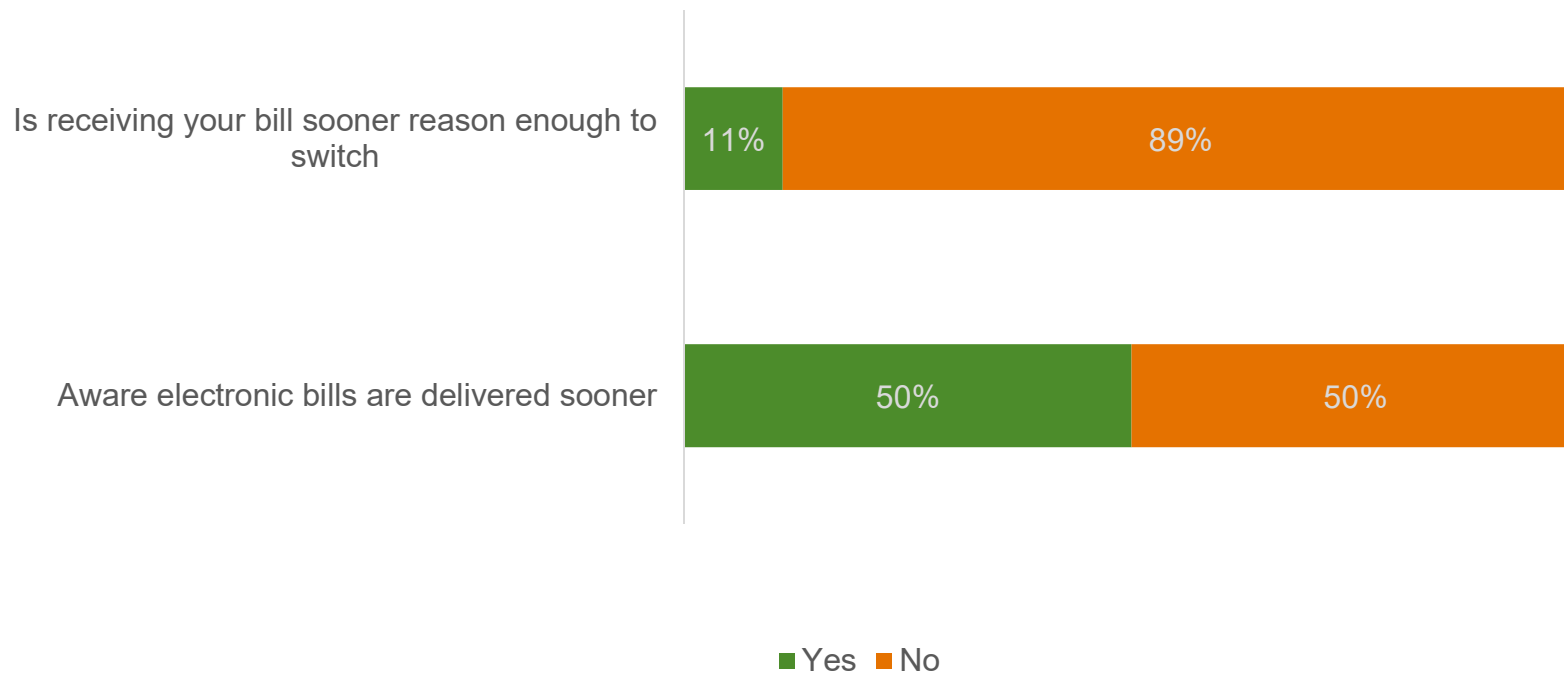
Willingness to switch to electronic billing if charged to receive your paper statement.

Age Breakdown, paper bill customers



Awareness and impact of receiving bills sooner

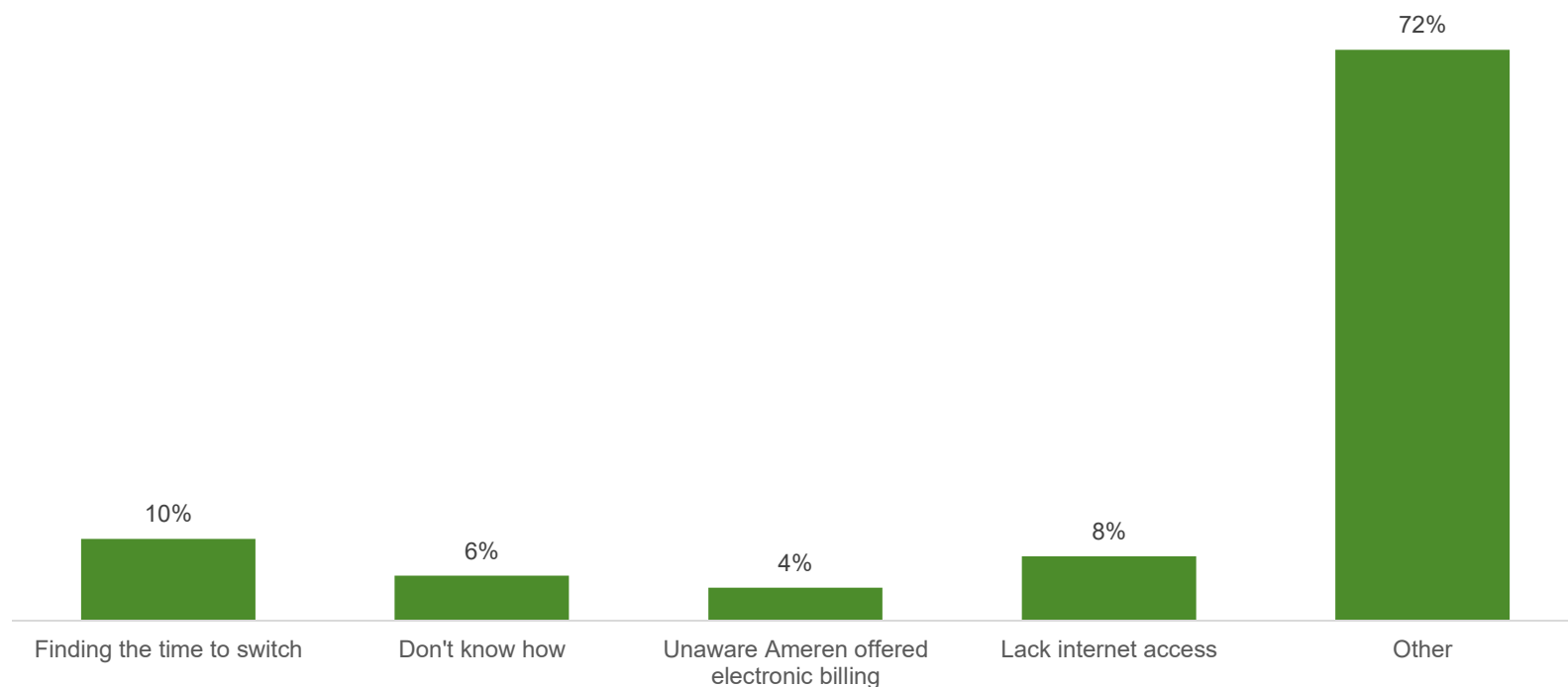
Paper bill customers





What has prevented you from switching to an electronic version of your bill? Select all that apply.

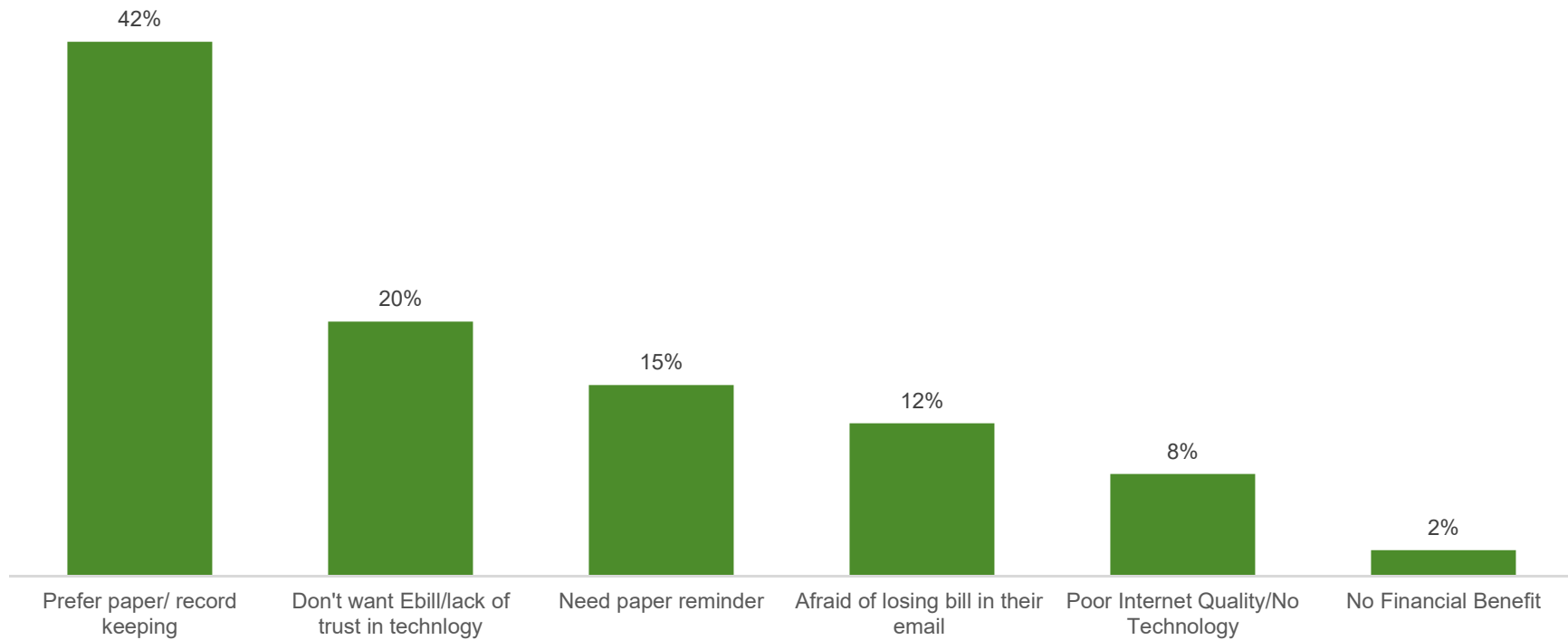
Paper bill customers



What has prevented you from switching to an electronic version of your bill? *Other*

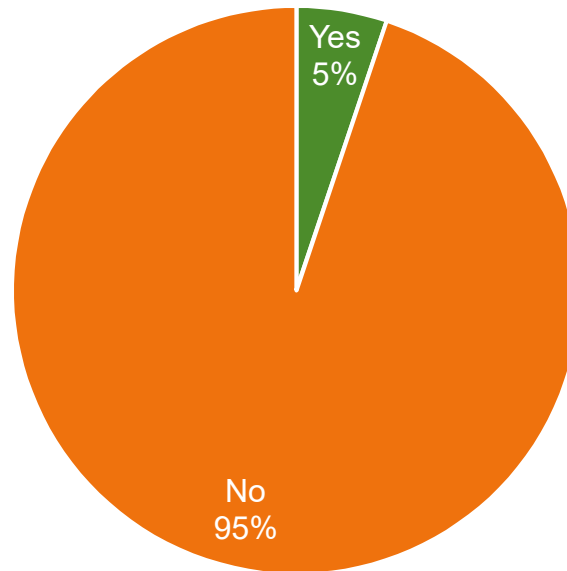


Paper bill customers



Those paying for a paper statement from another service provider

All participants





The proposed statement fee has a chance to damage overall satisfaction with Ameren.

paper bill customers

- *I'm 73 years old. I **do not get on my computer on a daily basis**. I also know as soon as I sign up for electronic billing then you will want me to start having some kind of auto pay. I did check into auto pay with a credit card but you want to charge me a service for that. I seem like when there is no other electric company you want to force us seniors to pay extra.*
- *I do not like being online that much and **it's easier to remember to pay** each month have the paper bill. I we were charged for the paper we would immediately look for alternative energy sources.*
- *Why charge for a bill what a joke Ameren is a monopoly and waste more money than almost all private companies. If you start charging for paper bills will rates be reduced or will you just waste the increased income you receive?*
- *My inbox is a black hole of items needing follow-up. I prefer the paper bill on my desk in front of me that gets dealt with as needed.*



Executive Summary

- More than half of Your Voice panel members (61%) are currently receiving a paperless bill from Ameren Missouri
- The main reason most of our electronic billing customers prefer electronic billing is that it is convenient and offers them peace of mind (52%).
- Paperless billing customers trust the entire electronic process and suggest the billing process is a very minor part of their relationship with Ameren.



Executive Summary Continued

Paper Billing Customers

- 40% of Your Voice members currently receive a paper bill
 - Among these customers, 80% pay their Ameren bill electronically
- 13% indicated they are likely/very likely to switch to an electronic bill in the next 12 months.
 - Another 20% are somewhat likely, which is not very reliable.
- 68% of millennials and 53% of gen X indicated they would switch. This suggests that these groups are better to target as there is a lesser chance that it could damage their satisfaction with Ameren.
- Many of the comments from paper bill customers expressed concerns about their age, lack of technology, bad internet, or routine when asked why they would not be willing to switch (being forced to switch was upsetting for a number of participants).
 - If the proposed paper billing fee were to be instated, carefully crafted communications need to offer the protected groups peace of mind so they understand they are not impacted by the change as it not impact their overall satisfaction with Ameren.
- An overwhelming amount of the participants choose to pay electronically in some form (89%). This suggests that most customers are aware of the electronic billing options but there is a gap in trust in either Ameren’s capability or the technology/process around electronic billing. How can we make the ebill process seem as “comfortable” as the epayment process.



Executive Summary Continued

Paper bill customers

- 49% of the respondents not currently on E-bill said that being charged to receive their monthly paper statement would influence them in switching to electronic billing.
- Only half are aware the electronic Ameren bill statement arrives 2-3 days before the paper bill statement.
 - 89% of the respondents who are currently not on electronic billing did not deem receiving your bill earlier as enough of a benefit to switch from their paper bill.
- Overall, most customers (42%) on paper billing choose to do so because they like paper as it serves as a reminder and a way to keep their own records. This suggests a switch to electronic could be upsetting or an inconvenience for this group
- Only 5% of the participants are aware of or are currently paying a paper statement fee. This could be seen a negative as we are then noted by them as the “first” to do so.



Recommendations and considerations

Making sure we put customers first

- How can we keep customer loyalty while also pushing for a switch to electronic billing?
- How can we support the customers as we move through this process?
 - Late fees waved as people are adjusting?
 - Multiple reminders via text and Email?
- Advocate for pairing some form of auto-pay to help reduce the amount of late fees associated with new paperless customers.



Paper Statement Fee 2022

Start of Block: Overall Sat

Q1 Overall, how satisfied are you with Ameren Missouri?

- Very satisfied (1)
- Satisfied (2)
- Somewhat satisfied (3)
- Somewhat dissatisfied (4)
- Dissatisfied (5)
- Very dissatisfied (6)

End of Block: Overall Sat

Start of Block: How receive bill

Text Thinking about your monthly Ameren bill, please let us know how you currently **pay** your bill as well as **receive** your bill.

Q2 How do you usually pay your Ameren bill?

- Recurring automatic payment through Ameren (1)
 - Recurring automatic payment through your bank (2)
 - Electronically via Ameren.com (3)
 - Electronically via your bank (4)
 - Mail (5)
 - Pay by phone (Western Union Speedpay) (6)
 - Pay Station (7)
 - Don't know (8)
-

Q3 How do you currently receive your Ameren bill?

- Paper statement (in the mail) (1)
- Electronically (e.g. Email or Text Message) (2)

End of Block: How receive bill

Start of Block: Like most on Ebill

Q3a What do you like most about your electronic bill?

End of Block: Like most on Ebill

Start of Block: Likeliness to switch

Q4 How likely are you to switch to an electronic version of your bill within the next year?

- Very likely (1)
- Likely (2)
- Somewhat likely (3)
- Not too likely (4)
- Not at all likely (5)

End of Block: Likeliness to switch

Start of Block: charge for paper

Q5 If you were charged each month to cover the cost of your paper bill statement, would you switch to a free electronic version of your bill?

- Yes (1)
- No (2)

End of Block: charge for paper

Start of Block: Why no switch

Q5a Why wouldn't you switch to an electronic version of your bill?

End of Block: Why no switch

Start of Block: aware of delivery/sooner pay

Q6 Are you aware that electronic bills are delivered an average of 2-3 days before the paper bill (due to postal delays)?

Yes (1)

No (2)

Q7 Would receiving your bill sooner be a reason to switch to an electronic version of your bill?

Yes (1)

No (2)

End of Block: aware of delivery/sooner pay

Start of Block: Prevented you from switching

Q7a What has prevented you from switching to an electronic version of your bill? Select all that apply.

Finding the time to switch (1)

Don't know how (2)

Unaware Ameren offered electronic billing (3)

Lack internet access (4)

Other (5) _____

End of Block: Prevented you from switching

Start of Block: awareness of other charges

Q8 Currently some banking, credit card and cell phone companies charge for paper statements. Are you currently paying for a paper statement with any of your service providers?

- Yes (1)
- No (2)
- Don't know (3)

End of Block: awareness of other charges

Start of Block: demos

Q13 Finally, we have just a few classification questions for analysis purposes.

Q14 What is your gender?

- Female (1)
 - Male (2)
 - Non-binary / third gender (3)
 - Prefer not to say (4)
-

Q15 Which of the following categories includes your age?

- 18-22 (Gen Z) (1)
 - 23-38 (Millennial) (2)
 - 39-54 (Gen X) (3)
 - 55-73 (Baby Boomer) (4)
 - 74+ (5)
-

Q16 Which of the following categories includes your total household income before taxes?

- Less than \$35,000 (1)
 - \$35,000-\$49,999 (2)
 - \$50,000-\$74,999 (3)
 - \$75,000-\$99,999 (4)
 - \$100,000-\$124,999 (5)
 - \$125,000-\$149,999 (6)
 - \$150,000-\$199,999 (7)
 - \$200,000+ (8)
 - Prefer not to answer (9)
-

Q17 Are you of Hispanic or Latino origin?

- Yes (1)
 - No (2)
 - Prefer not to answer (3)
-

Q18 Which of the following best describes your race?

- Black/African American (1)
 - Asian (including South Asian, such as Indian or Pakistani) (2)
 - White/Caucasian (3)
 - Other (4)
 - Prefer not to answer (5)
-

Q19 Would you describe the area in which you live as urban, suburban or rural?

- Urban (1)
- Suburban (2)
- Rural (3)
- Not sure (4)

End of Block: demos

Ameren Missouri's
Response to MPSC Data Request - MPSC
ER-2022-0337

In the Matter of Union Electric Company d/b/a Ameren Missouri's Tariffs to Adjust Its Revenues
for Electric Service

No.: MPSC 0298.1

In an attempt to increase paperless billing adoption, the Company states that a pre-checked paperless enrollment box was added to online and mobile transactions. Please provide the following: 1.) Since implementation Q2 2022, how many customers have contacted Ameren to advise that they did not notice the pre-checked box and did not intend to enroll in paperless billing? 2.) Of those customers, how many wished to remain enrolled in paperless billing and how many asked for removal preferring a paper bill? 3.) Has the Company disconnected or sent disconnection notices to customers who were not aware of the pre-checked box and therefore not aware that they were enrolled in paperless billing? If applicable, how many customers were disconnected and how many received a disconnection notice but were not disconnected?

Requested by Contessa King (Contessa.king@psc.mo.gov <<mailto:Contessa.king@psc.mo.gov>>)

RESPONSE

Prepared By: Megan Warnick
Title: Manager, Customer Engagement
Date: 12.9.22

1). Since implementation Q2 2022, how many customers have contacted Ameren to advise that they did not notice the pre-checked box and did not intend to enroll in paperless billing?

- Ameren Missouri collects feedback from customers who interact with our website either before, during or after the completion of online transactions. Since implementing the pre-checked box in April 2022, there have been 143 customers who have expressed frustration with the pre-checked box, which is less than 1% of customers enrolled in paperless billing through this method. The feedback received indicates customers *noticed* the pre-checked box, but did not want to be enrolled in paperless billing.

2.) Of those customers, how many wished to remain enrolled in paperless billing and how many asked for removal preferring a paper bill?

- None of the 143 customers who expressed frustration with the pre-checked box wanted to be enrolled in paperless billing. There are 10 customers who are currently enrolled in paperless billing and were enrolled *after* the implementation of the pre-checked box.

3.) Has the Company disconnected or sent disconnection notices to customers who were not aware of the pre-checked box and therefore not aware that they were enrolled in paperless billing? If applicable, how many customers were disconnected and how many received a disconnection notice but were not disconnected?

- Of the 143 Missouri customers who expressed frustration with the pre-checked box, 2 of the accounts which were enrolled in paperless billing were sent disconnection notices. Both accounts show a history of receiving disconnection notices *before and after* their paperless enrollment, however. Neither account's service was disconnected.