

*Exhibit No.:*  
*Issue:* *Quality of Service*  
*Witness:* *Lisa A. Kremer*  
*Sponsoring Party:* *MoPSC Staff*  
*Type of Exhibit:* *Rebuttal Testimony*  
*Case No.:* *ER-2016-0179*  
*Date Testimony Prepared:* *January 20, 2017*

**MISSOURI PUBLIC SERVICE COMMISSION**

**COMMISSION STAFF DIVISION**

**OPERATIONAL ANALYSIS DEPARTMENT**

**CONSUMER AND MANAGEMENT ANALYSIS UNIT**

**REBUTTAL TESTIMONY**

**OF**

**LISA A. KREMER**

**UNION ELECTRIC COMPANY D/B/A AMEREN MISSOURI**

**CASE NO. ER-2016-0179**

*Jefferson City, Missouri*  
*January 2017*

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LISA A. KREMER  
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d/b/a Ameren Missouri  
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1 **REBUTTAL TESTIMONY**

2 **OF**

3 **LISA A. KREMER**

4 **UNION ELECTRIC COMPANY D/B/A AMEREN MISSOURI**

5 **CASE NO. ER-2016-0179**

6 Q. Please state your name and business address.

7 A. Lisa A. Kremer, P.O. Box 360, Jefferson City, Missouri 65102.

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

9 A. I am the Manager of the Consumer and Management Analysis Unit (“Unit”) of  
10 the Missouri Public Service Commission (“Commission” or “PSC”).

11 Q. Describe your educational and professional background.

12 A. I graduated from Lincoln University in Jefferson City, Missouri with a  
13 Bachelor of Science Degree in Public Administration, and with a Master’s Degree in Business  
14 Administration. I have successfully passed the Certified Internal Auditor (“CIA”)  
15 examination and am a CIA.

16 I have been employed for approximately 30 years by the Commission as a Utility  
17 Management Analyst I, II and III and also as the Manager of the Consumer and Management  
18 Analysis Unit, my current position, which I assumed in the year 2000. Prior to working for  
19 the Commission, I was employed by Lincoln University for approximately two and one-half  
20 years as an institutional researcher.

21 Specifically since my employment with the PSC, I have participated in the analysis of,  
22 or had oversight responsibilities for reviews of numerous customer service processes and/or  
23 conducted comprehensive customer service reviews at all the large regulated electric, natural

1 | gas and water utilities including: Associated Natural Gas Company, Union Electric Company  
2 | d/b/a AmerenUE Electric and Gas Companies, Empire District Electric Company, Missouri  
3 | Gas Energy, Atmos Energy Corporation, Kansas City Power & Light Company (“KCPL”),  
4 | KCP&L Greater Missouri Operations Company (“GMO”) and the predecessor company  
5 | Aquila, Inc., Laclede Gas Company and Missouri American Water Company. I have filed  
6 | service quality testimony that included analysis of various service quality matters in a number  
7 | of Commission proceedings involving Missouri regulated utilities. At the direction of the  
8 | Commission starting in 2001, the Unit began reviewing the customer service practices of  
9 | small water and sewer utilities when they request rate increases. The Unit has performed  
10 | numerous reviews of this type since that time.

11 |         The Unit has also performed management audits of public utilities operating within  
12 | the state of Missouri under the jurisdiction of the Commission. I have served as Project  
13 | Manager or in support roles on a number of these projects during my years of employment at  
14 | the Commission, as well as participated in other types of utility investigation and review  
15 | projects. These reviews were conducted of electric, natural gas, telecommunications, water  
16 | and sewer companies operating within the state of Missouri.

17 |         The attached Schedule LAK-r1 is a listing of those cases in which I have filed  
18 | testimony before the Commission.

19 | **PURPOSE OF TESTIMONY**

20 |         Q.     What is the purpose of your testimony?

21 |         A.     The purpose of my testimony is to respond to the “Revenue Requirement  
22 | Adjustments” section beginning on page three of Ms. Tara K. Oglesby Direct Testimony filed  
23 | in Union Electric Company’s d/b/a Ameren Missouri (“Ameren Missouri” or “Company”)  
24 | Case No. ER-2016-0179.

1 Ms. Oglesby indicates in her direct testimony that there is “significant opportunity for  
2 increased utilization” for Ameren Missouri customers to enroll in Paperless Billing.<sup>1</sup> Ms.  
3 Oglesby’s testimony further goes on to say that “compared to a base of 59 large utilities,  
4 Ameren Missouri is 55<sup>th</sup> when it comes to the percentage of customers opting for paperless  
5 bills.” I will respond to, and oppose, Ms. Oglesby’s proposal to provide existing and new  
6 paperless bill customers with a “bill credit,” isolating the billing savings to only electronically  
7 billed customers when the entire body of Ameren Missouri ratepayers pay for all billing costs.

8 My testimony will further provide information as to the definition of a residential  
9 customer “bill” as required and detailed in Commission Rule 4 CSR 240-13.015 Definitions  
10 (Chapter 13) and will also address information Ameren Missouri has gained in its customer  
11 research paid for by all of its regulated customers. This research in the form of customer  
12 focus groups, has repeatedly affirmed to the Company for at least a few years that what  
13 appears to be its historically primary and consistent method of promoting paperless billing by  
14 means of messaging on customers’ “energy statements” is often both \*\* \_\_\_\_\_ \*\* by its  
15 customers and \*\* \_\_\_\_\_ \*\* in increasing the number of customers who agree to  
16 paperless billing (Schedule LAK-r2 and Highly Confidential (“HC”) Schedule LAK-r3<sup>2</sup>)

17 The Company provided, in response to Staff Data Request No. 359, other actions it  
18 has taken for limited periods of time to promote paperless billing, beginning at the end of  
19 2015 (Schedule LAK-r2). Those other actions will also be addressed in my testimony.

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<sup>1</sup> Oglesby Direct, Case No. ER-2016-0179, page 3, lines 16 through 19.

<sup>2</sup> Company’s Response to Staff Data Request No. 359 and the Company’s HC response to the Office of Public Counsel (“OPC”) Data Request No. 2161, customer focus group results.

1 **STAFF'S DISAGREEMENT WITH A BILL CREDIT / INCENTIVE FOR THOSE**  
2 **CUSTOMERS WHO AGREE TO RECEIVE THEIR BILLS ELECTRONICALLY**

3 Q. Is Staff opposed to the bill credit Ameren Missouri proposes to incent  
4 customers to utilize its paperless billing option?

5 A. Yes.

6 Q. Why is the Staff opposed to Ameren Missouri's proposal?

7 A. On the surface, the \$.40 bill credit may appear to encourage a "win-win"  
8 situation of 1) promoting the less costly billing option of electronic bills versus paper bills and  
9 2) giving the generated savings back to those customers who were responsible for "creating  
10 them."<sup>3</sup> However, what Staff finds of primary concern in Ameren Missouri's proposal is its  
11 apparent failure to recognize that, presently, all customers pay for all billing costs, whether  
12 those bills are electronically generated or generated on paper and as such, all customers  
13 should share equally in all billing savings.

14 Such billing costs include, but are not limited to: paper and electronic bills, the billing  
15 and meter reading systems that support and generate the bills and other related costs. To  
16 isolate "electronic bill savings" only to those customers who elect to receive their bills  
17 electronically ignores the fact that all Ameren Missouri customers pay for all of the billing  
18 costs irrespective of how individual customers are billed. Paper billed customers also pay a  
19 portion of their rates for the support systems, processes and procedures that comprise the costs  
20 that enable electronic billing. As such, it is only appropriate and reasonable that paper billed  
21 customers should likewise share in all savings associated with any and all aspects of bill  
22 delivery efficiencies gained, particularly in light of Chapter 13 which not only permits both

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<sup>3</sup> Oglesby Direct, Case No. ER-2016-0179, page 5, line 13.

1 | electronic and paper bills at the customer's option, but does not promote one bill delivery  
2 | system over another.<sup>4</sup>

3 |         In addition, the consideration of a bill credit to incent customers to agree to electronic  
4 | billing may also be premature given what appears to be the limited time Ameren Missouri has  
5 | been promoting electronic billing and its partial reliance on bill messages which its own  
6 | customer research has demonstrated are \*\* \_\_\_\_\_ \*\*

7 |         Q.     Is there anything else in Ms. Oglesby's testimony that raises concern with you?

8 |         A.     Yes. While Ameren Missouri indicates any changes in its proposed \$.40  
9 | billing credit would occur in a future rate case, it was non-committal about the length of time  
10 | it anticipates offering such a credit. If Ameren Missouri has studied such a bill incentive and  
11 | its anticipated effectiveness for promoting customers to elect paperless billing, it did not state  
12 | such in its testimony that Staff is aware. Should customers question Ameren Missouri at the  
13 | time of agreeing to paperless billing as to how long they may expect to receive the \$.40 credit  
14 | on future electronic bills, Ameren Missouri would be unable to provide an answer or  
15 | commitment other than to say the credit may be re-evaluated.

16 | **PAPERLESS AND/OR ELECTRONIC BILLING**

17 |         Q.     Do Missouri Public Service Commission Rules permit regulated utilities to  
18 | offer their customers paperless bills?

19 |         A.     Yes. Chapter 13 of Missouri Public Service Commission Rules clearly defines  
20 | a "bill" for residential service as the following:

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<sup>4</sup> Staff Witness Ms. Erin Carle of the Commission's Auditing Department does not support Ameren Missouri witness Ms. Oglesby's adjustment recommendation in her direct testimony regarding paperless billing. Ms. Carle relates in her testimony that Ameren Missouri is giving up all of the cost savings that have been achieved and that would be achieved in the future through its proposed paperless billing adjustment.

<sup>5</sup> HC Schedule LAK-r3, pages 4, 6, 7 and 16.

Rebuttal Testimony of  
Lisa A. Kremer

1                   4 CSR 240-13.015(B) Bill means a written demand, including,  
2                   *if agreed to by the customer* and the utility, an electronic  
3                   demand, for payment for service or equipment and the taxes,  
4                   surcharges, and franchise fees. [Emphasis added].

5           Q.     Why did you italicize “if agreed to by the customer” above?

6           A.     It is important to be clear that regulated customers are not required to accept  
7           the offering of electronic bills but must agree to receive their bills in such a manner. Not all  
8           customers prefer to receive, or are capable of receiving their regulated utility bills  
9           electronically and they are not required to do so by Commission rules.

10          Q.     Are the Commission’s billing rules and requirements as identified in Chapter  
11          13 identical for customers whether or not the customer receives his/her bill in paper or  
12          electronic form?

13          A.     Yes.

14          Q.     Why may a customer or customers prefer to continue receiving bills in a paper  
15          format sent through the United States Postal Service?

16          A.     There may be any number of possible reasons including but not limited to:  
17          customers are not comfortable with or may have limited access to internet technology, may  
18          have an unreliable internet provider or unreliable computer equipment, may be accustomed to  
19          receiving paper bills and hesitant to move to electronic bill forms, may have concerns with  
20          “overlooking” or “missing” an electronic bill, or other rationale.

21          Q.     Does Staff agree that Ameren Missouri’s paperless billing penetration rate is  
22          low as expressed by Ms. Oglesby?

23          A.     Staff does not dispute the material provided in Ms. Oglesby’s testimony which  
24          indicates that Ameren Missouri is 55<sup>th</sup> out of 59 large utilities, supported by Ameren



Rebuttal Testimony of  
Lisa A. Kremer

1 Missouri's small percentage (15%) of its customers who have elected to receive their bill  
2 electronically.

3 Q. Does Staff agree that there are benefits for some customers to receive their  
4 bills electronically?

5 A. Staff does not dispute material presented in the Company's response to the  
6 Office of Public Counsel's ("OPC") Data Request No. 2150 (Schedule LAK-r4) which  
7 provides five benefits of paperless or electronic billing.

8 Further, the Company's response to OPC's Data Request No. 2151 (Schedule  
9 LAK-r5) conveyed information that electronic billing may significantly decrease the number  
10 of late payments occurring by customers who receive paper bills as opposed to those who  
11 receive electronic bills. Such reduction in late payments would avoid potential late payment  
12 fees for customers and by bringing customer payments to Ameren Missouri faster could  
13 positively impact its cash flow.

14 What Staff found absent in Ms. Oglesby's Direct Testimony on this subject, and an  
15 important question that Staff finds to be unanswered by Ameren Missouri's ranking of 55 out  
16 of 59 large utilities whose customers receive paperless bills is: "Why?"

17 Q. Did Staff inquire and did Ameren Missouri respond with indication or  
18 information as to "why" it has not been more successful in engaging its customers to move  
19 from paper bills to electronic or paperless bills?

20 A. Yes. Staff made such an inquiry of Ameren Missouri, which provided the  
21 following key findings it attributes to its low enrollment in paperless billing:

22 "Sign up process can be challenging. Sign up takes several  
23 steps online.

24 Promotional opportunities exist to improve communication and  
25 incent customers to activate.

1                   Leverage additional communication channels and include more  
2                   in our contact center discussions.”<sup>6</sup>

3           Q.     Did Staff review any additional material that may also be a contributing factor  
4           to Ameren Missouri’s low percentage of customers who have agreed to receive their electric  
5           bills electronically?

6           A.     Yes. The Staff reviewed Ameren Missouri’s response to OPC’s Data Request  
7           No. 2161, which requested the following:

8                   **Has the Company conducted any research or hired third-**  
9                   **parties to conduct research involving focus groups or**  
10                   **surveys of Company specific-ratepayer perspectives**  
11                   **involving the Company’s billing education, format and**  
12                   **process? If yes, please provide any and all examples over**  
13                   **the past five years. Please indicate whether said research**  
14                   **was centered on billing that [sic] paper, paperless, or both.**<sup>7</sup>

15           Staff also reviewed Ameren Missouri’s Response to Staff Data Request No. 359 (Schedule  
16           LAK-r2), which requested the following of the Company:

17                   **With regard to Ms. Olgesby’s [sic] direct testimony page 3,**  
18                   **lines 16-19, please provide a description of all ways in which**  
19                   **Ameren / Ameren Services have encouraged or promoted**  
20                   **paperless billing to Missouri and Illinois customers since**  
21                   **January 1, 2013. Please provide all reasons Ameren /**  
22                   **Ameren Services believe not more than 15% of the Ameren**  
23                   **customer base has enrolled in electronic billing and Ameren**  
24                   **is presently 55<sup>th</sup> out of 59 utilities whose customers have**  
25                   **opted for paperless billing.**

26           Q.     What actions does Ameren Missouri indicate it has taken to promote  
27           paperless billing?

28           A.     Ameren Missouri’s efforts to promote paperless billing to its customers appear  
29           to be a more recent initiative which began in late 2014 through promotion on customer energy  
30           statements (bills), which Ameren Missouri did twice (2) during October and November 2014.  
31           Ameren Missouri also promoted paperless billing in August and November of 2015 on what

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<sup>6</sup> Schedule LAK-r2, page 2.

<sup>7</sup> HC Schedule LAK-r3.

1 Staff understands to be both customer bills and bill return envelopes. During 2016, Ameren  
2 Missouri promoted its paperless billing option five (5) times on its customer bills and three (3)  
3 times on the bills' envelopes.<sup>8</sup>

4 Ameren Missouri also provided Staff its paperless billing communication plan, which  
5 it states was executed at the end of 2015, or approximately a year ago. The plan included  
6 what appear to be various initiatives conducted over short time periods such as Web, Social  
7 Media, Metro Link signage, direct mail, a four month contact center drive, employee  
8 communications, and an initiative that included what Staff understands to be the seeking of  
9 input from "internal resources" which Staff interprets to mean Ameren Missouri employees.

10 Q. In its review of Ameren Missouri's responses to OPC Data Request No. 2161  
11 and Staff Data Request No. 0359, did Staff form any thoughts about any reasons, in addition  
12 to the three provided by Ameren Missouri detailed above, as contributing to the Company's  
13 present low percentage of customers who have agreed to paperless billing at the present time?

14 A. Yes. Two points struck Staff in Ameren Missouri's responses to Staff and  
15 OPC inquiries:

- 16 1. The fact that Ameren Missouri appears to not have "been trying" very long to  
17 engage its customers to utilize a paperless billing option.
- 18 2. The most frequent, consistent effort to engage customers in paperless billing  
19 appears to have been bill messages on the new customer bill, which Ameren  
20 Missouri knows, through its focus groups, has been identified repeatedly by its  
21 customer base as being \*\* \_\_\_\_\_

22 \_\_\_\_\_ \*\*

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<sup>8</sup> Schedule LAK-r2.

<sup>9</sup> HC Schedule LAK-r3, pages 4, 6, 7 and 16.

Rebuttal Testimony of  
Lisa A. Kremer

1 Staff points out however, that at the time of this rebuttal writing it has requested  
2 Ameren Missouri's current call center scripts and Interactive or Integrated Voice Response  
3 (IVR) scripting/menus. When Staff receives the scripts/menus, it will use the information to  
4 determine whether or not Ameren Missouri is currently engaging the resources of its contact  
5 (also known as call center(s)) to promote paperless billing, including attempts to enroll  
6 customers at the initial time of new service requests, which Staff understands to have been  
7 effective for another regulated utility. This key, initial "customer touch point" at the time the  
8 customer calls Ameren Missouri to request regulated electric service, if presently not fully  
9 and consistently utilized, may assist Ameren Missouri in improving both the percentage of  
10 Missouri customers who enroll in paperless bills and consequently its 55<sup>th</sup> out of 59<sup>th</sup> ranking  
11 for large companies whose customers have agreed to electronic billing and which seems to be  
12 the basis of Ameren Missouri's \$.40 bill incentive/credit proposal.

13 Q. Does this conclude your testimony?

14 A. Yes.

**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 Electric Service            )        Case No. ER-2016-0179  
  )

**AFFIDAVIT OF LISA A. KREMER**

STATE OF MISSOURI        )  
                                  )        ss.  
COUNTY OF COLE        )

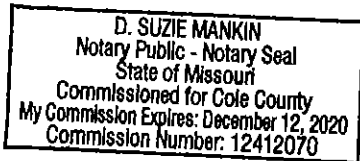
COMES NOW LISA A. KREMER and on her oath declares that she is of sound mind and lawful age; that she contributed to the foregoing Rebuttal Testimony; and that the same is true and correct according to her best knowledge and belief.

Further the Affiant sayeth not.

*Lisa A. Kremer*  
\_\_\_\_\_  
**LISA A. KREMER**

**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 18<sup>th</sup> day of January, 2017.



*D. Suzie Mankin*  
\_\_\_\_\_  
Notary Public

**CASE PROCEEDING PARTICIPATION**

**LISA A. KREMER**

PARTICIPATION		TESTIMONY
COMPANY	CASE NO.	ISSUES
KCP&L – Greater Missouri Operations	ER-2016-0156	Rebuttal - Quality of Service
Kansas City Power & Light Company KCP&L – Greater Missouri Operations	EC-2015-0309	Surrebuttal - Quality of Service
Kansas City Power & Light Company KCP&L – Greater Missouri Operations	EC-2015-0309	Direct - Quality of Service
Kansas City Power & Light Company	ER-2014-0370	Surrebuttal – Quality of Service
Missouri-American Water Company	WC-2014-0138	Direct - Quality of Service
Missouri Gas Energy (MGE) a Division of Laclede Gas Company	GR-2014-0007	Surrebuttal – Quality of Service
KCP&L Greater Missouri Operations Company	ER-2010-0356	Rebuttal - Quality of Service
Kansas City Power & Light Company	ER-2010-0355	Rebuttal – Quality of Service
Kansas City Power & Light Company	ER-2009-0089	Surrebuttal - Quality of Service
Greater Missouri Operations Company GMO-MPs and GMO-L&P Electric	ER-2009-0090	Surrebuttal – Quality of Service
Laclede Gas Company	GT-2009-0026	Rebuttal – Quality of Service
Atmos Energy Company	GR-2006-0387	Direct – Quality of Service Report – Staff Response to Commission Order
Aquila, Inc.	GR-2004-0072	Direct - Quality of Service
Aquila, Inc.	ER-2004-0034 & HR-2004-0024	Direct - Quality of Service Rebuttal – Quality of Service
Laclede Gas Company	GR-2002-356	Rebuttal – Expense Decommissioning
Missouri Gas Energy	GR-2001-292	Rebuttal – Customer Service
UtiliCorp United Inc. / Empire District Electric Company	EM-2000-369	Rebuttal – Customer Service
Atmos Energy Company / Associated Natural Gas Company	GM-2000-312	Rebuttal – Customer Service
Raytown Water Company	WR-94-211	Rebuttal - Management Audit

Ameren Missouri's  
Response to MPSC Data Request  
Docket No. ER-2016-0179  
In the Matter of Union Electric Company d/b/a Ameren Missouri's Tariffs to Increase Its  
Revenues for Electric Service

Data Request No.: MPSC 0359

With regard to Ms. Olgesby's direct testimony page 3, lines 16-19, please provide a description of all ways in which Ameren / Ameren Services have encouraged or promoted paperless billing to Missouri and Illinois customers since January 1, 2013. Please provide all reasons Ameren / Ameren Services believe not more than 15% of the Ameren Missouri customer base has enrolled in electronic billing and Ameren Missouri is presently 55th out of 59 utilities whose customers have opted for paperless billing

**RESPONSE**

**Prepared By: Jeff Esserman**  
**Title: Director, Customer Experience Operations**  
**Date: 10/03/16**

Paperless billing was promoted on the energy statement during the following months:

- Oct & Nov 2014
- August 2015
- November 2015
- January 2016
- March 2016
- April 2016
- May 2016
- June 2016
- July 2016

A paperless billing message appeared on the energy statement envelope in the following months:

- August and November - 2015
- April, June, and August – 2016

Attached is the paperless billing communication plan that was executed at the end of 2015.

In addition we are providing materials / inserts where paperless billing is mentioned.

In terms of low enrollment, Ameren Missouri completed a process improvement event and found the below items could be contributors to lower enrollment:

- Sign up process can be challenging. Sign up takes several steps online.
- promotional opportunities exist to improve communication and incent customers to activate
- leverage additional communication channels and include more in our contact center discussions

These were key findings internally.



The tactics outlined below will be executed as the Phase 1 – Test and Learn program. Investment of \$20,000.

Tactic	Description	Timing	Potential Cost
<b>Web</b>	<ul style="list-style-type: none"> <li>Messaging and Links on select Ameren.com webpages</li> </ul>	<ul style="list-style-type: none"> <li>September - December</li> </ul>	<ul style="list-style-type: none"> <li><b>\$0</b></li> <li>Internal resources to support</li> </ul>
<b>Social/Paid Search</b>	<ul style="list-style-type: none"> <li>Social Posts on Twitter + Facebook (frequency as recommended by social team)</li> <li>Facebook Custom Audience (pending legal and cybersecurity approval)</li> <li>Paid Search</li> </ul>	<ul style="list-style-type: none"> <li>September - December</li> </ul>	<ul style="list-style-type: none"> <li><b>\$11,000</b></li> </ul>
<b>Paid Media</b>	<ul style="list-style-type: none"> <li>Metro Link signage to drive SMS campaign</li> </ul>	<ul style="list-style-type: none"> <li>1 month time period (based on availability)</li> </ul>	<ul style="list-style-type: none"> <li><b>\$2,500</b></li> </ul>
<b>Direct Mail</b>	<ul style="list-style-type: none"> <li>Energy Statement Messaging (4x/year)</li> <li>“Go Paperless” message on energy statement envelope.</li> </ul>	<ul style="list-style-type: none"> <li>August</li> <li>November</li> </ul>	<ul style="list-style-type: none"> <li><b>\$0</b></li> <li>Internal resources to support</li> </ul>
<b>Contact Center Drive</b>	<ul style="list-style-type: none"> <li>Incentive program for contact center to drive new enrollments (multiple tier)</li> <li>Targeting Tips will be provided to the Contact Center</li> </ul>	<ul style="list-style-type: none"> <li>September – December</li> </ul>	<ul style="list-style-type: none"> <li><b>\$1,500</b></li> <li>Multiple prizes to generate multiple opportunities</li> </ul>
<b>Employee Communications</b>	<ul style="list-style-type: none"> <li>Ameren Online, Ameren Journal, Scholar News, Digital Signage</li> <li>Cardinals/Blues/Rams Ticket Sweepstakes                             <ul style="list-style-type: none"> <li><i>Co-workers to email their ebill statement to an Inbox. This will serve as their entry form.</i></li> </ul> </li> </ul>	<ul style="list-style-type: none"> <li>September - December</li> </ul>	<ul style="list-style-type: none"> <li><b>\$0</b></li> <li>Leverage internal assets (Tickets)</li> <li>Internal resources to support</li> </ul>
<b>Agency Fees</b>	<ul style="list-style-type: none"> <li>Utilize HLK (Agency of Record) to fine tune messaging and develop basic creative approach</li> <li>Utilize internal resources to extrapolate creative executions</li> </ul>	<ul style="list-style-type: none"> <li>August</li> </ul>	<ul style="list-style-type: none"> <li><b>\$5,000</b></li> </ul>
<b>TOTAL PHASE 1 INVESTMENT</b>			<p align="right"><b>Schedule LAK-r2 \$20,000</b> <b>Page 3 of 3</b></p>

**SCHEDULE LAK-r3**

**HAVE BEEN DEEMED**

**HIGHLY CONFIDENTIAL**

**IN THEIR ENTIRETY**

Ameren Missouri's  
Response to OPC Data Request  
ER-2016-0179

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

Data Request No.: OPC 2150

What are the benefits from the Company's perspective, of electronic billing?

**RESPONSE**

**Prepared By: Jeff Esserman**

**Title: Director, Customer Experience**

**Date: 12/27/16**

The benefits of electronic billing include but are not limited to:

**Convenience:** Customers get access to their exact bill amount and supporting information the day it is produced vs having to wait for the mail. They also do not have to deal with opening the bill, writing a check, stuffing and envelope and affixing postage.

**Channels of access:** Electronic Billing provides customers with access to their bills as an option through channels that are utilized today for many business purposes and communication. These channels include email, text and smartphones

**Record keeping:** Electronic access to the bill provides our customers with an option to maintain their billing information electronically.

**Cost savings:** Electronic billing saves both Ameren Missouri and our customers the costs of paper and postage by providing the information in electronic form.

For Ameren Missouri, the data we receive through JD Power indicated that those customers on paperless billing have higher levels of customer satisfaction thus reducing complaints. In addition, the paperless option creates an efficient method of delivery and timeliness of billing information to customers.

Ameren Missouri's  
Response to OPC Data Request  
ER-2016-0179

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

Data Request No.: OPC 2151

**Please provide the percentage of late payments of electronic bills relative to paper bills on a monthly basis for the past year?**

**RESPONSE**

<b>Prepared By: Amy Hayes</b>
<b>Title: Manager, Customer Solutions</b>
<b>Date: 12/22/2016</b>

Method of Bill Delivery	Year	Month	% of Late Payments
Paper Bill	2015	December	94%
Paper Bill	2016	January	93%
Paper Bill	2016	February	93%
Paper Bill	2016	March	93%
Paper Bill	2016	April	93%
Paper Bill	2016	May	93%
Paper Bill	2016	June	92%
Paper Bill	2016	July	91%
Paper Bill	2016	August	90%
Paper Bill	2016	September	90%
Paper Bill	2016	October	89%
Paper Bill	2016	November	89%
Ebill	2015	December	6%
Ebill	2016	January	7%
Ebill	2016	February	7%
Ebill	2016	March	7%
Ebill	2016	April	7%
Ebill	2016	May	7%
Ebill	2016	June	8%
Ebill	2016	July	9%

Ebill	2016	August	10%
Ebill	2016	September	10%
Ebill	2016	October	11%
Ebill	2016	November	11%