

## ATTACHMENT 1

### Variations and Revisions Regarding Customer Meter Readings<sup>1</sup>

Variance Requested <sup>i, ii</sup>	Rationale <sup>iii</sup>	Justification <sup>iv</sup>
<p><b>Customer Meter Readings</b></p>	<p><b>20 CSR 4240-13.020(2)(A)3</b> - ...If the utility is unable to obtain an actual correct meter reading ..., where necessary, it shall undertake reasonable alternatives to obtain a customer reading of the meter, for example mailing or leaving post-paid, preaddressed postcards upon which the customer may note the reading unless the customer requests otherwise...</p>	<p>As described in the <i>Report</i> submitted with the original <i>Application</i> in this proceeding, allowing customer meter readings will be confusing or impossible for customers, and given the communications capabilities of AMI, should be unnecessary.</p> <p>As described in the <i>Report</i> submitted with the original <i>Application</i> in this proceeding,, given the 2-way communication capabilities of AMI, no customer will be disadvantaged by not being able to directly read a meter and provide that reading for billing. Rather, the customer will have 24-hour access to his or her usage data in a granularity not previously available.</p>
	<p><b>20 CSR 4240-13.020(3)</b> - If a utility is unable to obtain an actual meter reading for three (3) consecutive billing periods, the utility shall advise the customer by first class mail or personal delivery that ... the customer may read and report their electric, gas, sewer, or water usage to the utility on a regular basis. A utility shall explain to the customer the procedure by which this reading and reporting may be initiated....</p>	
	<p><b>20 CSR 4240-13.040(3)</b> - A utility shall prepare, in written form, information in plain language, which summarizes the rights and responsibilities of the utility and its customers in accordance with this chapter.... The written information shall indicate conspicuously that it is being provided in accordance with the rules of the commission, and shall contain information concerning, but not limited to - ... (G) Explanation of meter reading procedures which would enable a customer to read his/her own meter...</p>	
	<p><b>REVISION: Sheet No. 130, General Rules and Regulations, V. Billing Practices, D. Customer Readings</b> - The</p>	

<sup>1</sup> See *Application for Variations* at pages 12 - 13, Table 4.

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Variance Requested <sup>i, ii</sup>	Rationale <sup>iii</sup>	Justification <sup>iv</sup>
<p>Company will provide all customers the opportunity to read and report monthly energy usage so long as the reports are regular and accurate. The Company will provide pre-addressed, post-paid postcards for this purpose upon request....</p>		

i - 20 CSR 4240-2.060(4)(A) – The regulation from which the Company requests a waiver and/or variance.

ii - 20 CSR 4240-2.060(4)(C) – Ameren Missouri is the only public utility affected by this variance request.

iii - 20 CSR 4240-2.060(4)(B) – The reason the waiver and/or variance is requested.

iv - 20 CSR 4240-2.060(4)(B) – The justification for the waiver/and or variance, e.g., why no one will be harmed, and may even benefit, from the proposed waiver.

## ATTACHMENT 1

### Variations and/or Revisions Regarding Estimation Routine<sup>2</sup>

Variance Requested (if needed) <sup>i, ii</sup>	Rationale <sup>iii</sup>	Justification <sup>iv</sup>
<p><b>Estimation Routines</b></p>	<p>As described in the <i>Report</i> submitted with the original <i>Application</i> in this proceeding,, the proposed tariff will create an estimation routine appropriate for use with AMI meters.</p>	<p>As described in the <i>Report</i> submitted with the original <i>Application</i> in this proceeding,, Ameren Missouri's existing estimation routine does not provide for the nuances of an AMI metering system, or a system with both AMR and AMI metering types. The Company's proposed tariff revision allows for the increasing estimation accuracy provided by AMI meters.</p>
<p><b>20 CSR 4240-13.020(C)</b> – When a utility renders a bill based on estimated usage, it shall comply with the following:</p> <p>1. A utility that has an estimating procedure in its filed and commission-approved tariffs shall follow that estimating procedure;</p>	<p><b>REVISION: Sheet No. 131.1, General Rules and Regulations, V. Billing Practices, E. Estimated Billing, 3. General Estimating Procedures</b> – In estimating readings, Company will generally use the identical use during the corresponding month of the prior year. If the customer did not use service at this location at that time, the estimated use is the identical use during the preceding month of the current year. Exceptions to the general rule will be basically refinements for initial bills, final bills, bills of electric space heating customers during the first year of service, etc.</p> <p>Bills rendered for electric service in months in which meters are not read will be subject to all rules and regulations to bills based on actual meter readings.</p> <p>Where bills are rendered for periods of use in excess of or less than the period provided for under paragraph A, Monthly Billing Periods, all components of the rate will be prorated.</p>	

i - 20 CSR 4240-2.060(4)(A) – The regulation from which the Company requests a waiver and/or variance.

ii – 20 CSR 4240-2.060(4)(C) – Ameren Missouri is the only public utility affected by this variance request.

iii - 20 CSR 4240-2.060(4)(B) – The reason the waiver and/or variance is requested.

iv - 20 CSR 4240-2.060(4)(B) – The justification for the waiver/and or variance, e.g., why no one will be harmed, and may even benefit, from the proposed waiver.

<sup>2</sup> See *Application for Variances* at pages 14 – 15, Table 5.