

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

In the Matter of Union Electric Company)	
d/b/a Ameren Missouri's Request for a)	
Waiver of Various Tariffs and Regulations)	File No. EE-2019-0382
to Enable the Deployment of Automated)	
Metering Infrastructure Beginning in 2020.)	

SUPPLEMENTAL APPLICATION FOR VARIANCES

COMES NOW Union Electric Company d/b/a Ameren Missouri (“Ameren Missouri” or “the Company”), and, pursuant to and in accordance with 20 CSR 4240-2.060 and 20 CSR 4240-13.065, requests from the Missouri Public Service Commission (“Commission”) approval of certain variances from portions of 20 CSR 4240 Chapter 13, in supplement to its original *Application for Variances* (“*Original Application*”) submitted in this case on October 8, 2019. In support of this *Supplemental Application for Variances* (“*Supplemental Application*”), the Company respectfully represents and states:

I. Background

1. On October 8, 2019, Ameren Missouri submitted its *Original Application* in this matter, which described the implementation of various “smart” technologies, and included a *Smart Meter Plan Report* (“*Report*”) in support of its request. On May 15, 2020, Ameren Missouri, the Commission Staff (“Staff”), AARP, and the Consumers Council of Missouri (“CCM”) executed a *Partial Settlement Agreement*. While it did not join in the *Partial Settlement Agreement*, the Office of the Public Counsel (“OPC”) indicated it did not object. On May 28, 2020, the Commission approved the *Partial Settlement Agreement*. In light of the *Partial Settlement Agreement*, the only issues remaining in this proceeding specifically regard the Company's obligations in contacting customers before disconnection and the reduction of reconnection fees. The signatories

specifically reserved the variances and revisions from the following rules and tariffs for continued litigation:

Table 1 - Rules and Tariffs Reserved for Litigation¹

Rule or Tariff from which Variance or Revision Requestedⁱ	
Door Hangers/Contact	VARIANCE: 20 CSR 4240-13.050(9): Immediately preceding the discontinuance of service, the employee of the utility designated to perform this function, except where the safety of the employee is endangered, shall make a reasonable effort to contact and identify him/herself to the customer or a responsible person then upon the premises and shall announce the purpose of his/her presence. When service is discontinued, the employee shall leave a notice upon the premises in a manner conspicuous to the customer that service has been discontinued and the address and telephone number of the utility where the customer may arrange to have service restored.
	REVISION: Tariff Sheet No. 143, General Rules and Regulations, VII. Disconnection and Reconnection of Service – Residential Customer Contact and Notice of Disconnection - ... Immediately preceding the disconnection of service, the Company employee or agent designated to perform such function will, except in individual situations where the safety of the employee or agent may be a consideration, make a reasonable effort to contact and identify himself to the customer or responsible person at the premises to announce his purpose.
	REVISION: Tariff Sheet No. 144, General Rules and Regulations, VII. Disconnection and Reconnection of Service – Residential Customer Contact and Notice of Disconnection - When service is disconnected, the Company employee or agent will leave a notice at the premises in a manner conspicuous to the customer that service has been disconnected and the Company address and telephone number where the customer may arrange to have service restored.
Reduction of Reconnection Fee for AMI Customers	REVISION: Tariff Sheet No. 145, General Rules and Regulations, VII. Disconnection and Reconnection of Service – Reconnection of Service - ... In the event any such disconnected customer, or anyone acting for him, thereafter desires to receive service from Company by reconnection at the same location or at any other location, the payment to Company of the aforesaid liabilities and the payment to Company of each of the following items, as applicable, or the making of arrangements satisfactory to Company therefore, shall be conditions precedent to such reconnection or connection: 1. The charge for reconnection of service indicated on Sheet No. 63, Miscellaneous Charges, for each connection point.... (I.e., Lowering reconnection fee for AMI customers)

ⁱ If "VARIANCE" appears before the quoted rule, the Company is seeking a variance from that rule. If "REVISION" appears before the quoted tariff, the Company is seeking to revise the language.

¹ See also *Original Application*, pages 7 – 8, Table 2, and *Partial Settlement Agreement*, Attachment 3.

2. Over the course of the proceeding and various settlement discussions, Staff raised the issue of whether Ameren Missouri should also have requested waiver of 20 CSR 4240-13.055(3)(C) and (D), which are provisions regarding personal contact during the cold weather rule ("CWR") period. The Company admits it overlooked a request for waiver of (D), while it averred that it did not believe a waiver of (C) was required. However, Ameren Missouri indicated it would request a waiver of (D), and in doing so, would also request a waiver of (C) out of an abundance of caution. These waivers also relate to the personal contact provisions of Chapter 13, and can be addressed with the issues reserved for litigation noted above.

3. Ameren Missouri therefore is submitting this *Supplemental Application* to request additional waivers in line with its discussions. Because it is supplementing its original application in this case, Ameren Missouri is relying on much of the original documentation provided with its *Original Application* and will not be restating and resubmitting information already provided therein, including that information provided in accordance with 20 CSR 4240-2.060(1) (A) through (L);² that information remains unchanged. However, the Company is providing an updated verification per 20 CSR 4240-2.060(1)(M) as Appendix 1 to this *Supplemental Application*, and is providing additional information and notice in accordance with 20 CSR 4240-13.065, applicable to Chapter 13 variances.

II. Chapter 13 Variances Requested

4. Ameren Missouri notes that all requested variances contained in Section II of this *Application* are only for customers who have an AMI meter installed as the five-year deployment period progresses. As it relates to the variances requested in Table 2 below, Ameren Missouri will

² If required, Ameren Missouri adopts that previously *Original Application*, including the requirements of 20 CSR 4240-2.060(1) (A) through (L), by reference as if fully incorporated herein.

continue to operate under the existing tariffs and regulations as appropriate for customers who either have not yet received an AMI meter or who have opted out of AMI meter installation.

A. 20 CSR 4240-13.065(2)

5. As provided for in 20 CSR 4240-13.065(2), Ameren Missouri has mailed, contemporaneously with the filing of this *Application*, a copy of this *Supplemental Application* by first class mail to the newspaper with the largest circulation in each county within the utility's service area affected by the variance, the public counsel and each party in the utility's most recent rate case (File No. ER-2019-0355), who represented residential customers. Further, as required by 20 CSR 4240-13.065(3), Ameren Missouri will reflect any and all variances authorized by the Commission pursuant to this *Supplemental Application* in the relevant tariffs.

B. 20 CSR 4240-13.055(3)(C) and (D)

6. As previously stated in the *Original Application*, one of the advantages of AMI is the ability to remotely disconnect and reconnect service. This automated functionality means the Company does not have to send a crew, which reduces the Company's operating costs, improves safety, allows for quick or easily scheduled connection or disconnection of service at the convenience of the customer, and saves customers money. These benefits are described in more detail in the *Report*. However, current Commission rules require continued in-person interactions in several disconnection practices, including during the CWR period.

7. The Commission's CWR disconnection rules require customer contacts, and contact attempts, during the period from November 1 through March 31, or the CWR period. These contacts, as with others for which Ameren Missouri has requested a waiver, require a truck roll, which renders the benefits of remote disconnection irrelevant. Customers will still have multiple means to access Ameren Missouri's disconnection and reconnection information, even if truck rolls

- and any associated contacts or contact attempts - are discontinued. For one thing, by the time a disconnection occurs, the customer will already have received multiple mailings that contain the relevant information, such as the Company's contact information and how to avoid disconnection or reconnect service.³ The Company will complete automated phone calls and compliment with text and/or email notifications to those customers who have provided mobile phone numbers and email addresses, have created an Ameren Missouri online account, or have installed the Ameren Missouri applications on their smart devices. This information is also available 24 hours a day via Ameren Missouri's website. The Company will also have its customer experience personnel trained to address disconnections issues quickly and efficiently. That said, Ameren Missouri will add one more communication attempt with a phone call, and a text or email alert if the customer has chosen a preferred method and/or by default method (telephone) if no preferred method of communication associated with their account is indicated. Additionally, the customer may designate a third party to receive communication regarding potential disconnections.

8. In addition to the above, with specific regard to customers on Ameren Missouri's Medical Equipment Registry (these customers are among those contemplated by 20 CSR 4240-13.050(3)(D)), the Company already implements additional measures for their protection. For example, before these customers are disconnected, they will receive multiple communications, including a personal phone call. The Company will also install an extender, which limits the power the customer receives, allowing enough for the medical equipment to continue to operate. If full disconnection does ultimately become necessary, these customers receive a certified letter at least seven days before the date of disconnection. With AMI technology, extenders can be installed

³ Additionally, as noted in the *Original Application*, allowing remote disconnection and reconnection means that Company will be positioned to reduce reconnection fees from \$30 to \$10.

without a truck roll and customers can be reconnected within minutes of making a payment after disconnection

9. In order to implement the benefits of remote disconnection and reconnection, Ameren Missouri requests the variances, as required by 20 CSR 4240-2.060(4), that are listed in Table 2 below.

Table 2 – Rule Variances Regarding CWR Disconnections and Reconnections

Rules from which Variance Is Requested^{i, ii}	Rationale for Varianceⁱⁱⁱ	Justification for Variance^{iv}
<p>VARIANCE: 20 CSR 4240-13.055(3)(C): Notice Requirements. From November 1 through March 31, prior to discontinuance of service due to nonpayment, the utility shall –</p> <p>(C) Attempt to contact the customer at the time of the discontinuance of service in the manner specified by [20 CSR 4240-13.050(9)...⁴</p>	<p>As described briefly above and in more detail in the <i>Report</i>, discontinuing these personal contacts, and attempts at contact, will result in lower costs for reconnecting customers through the reduction of the reconnection fee and operations and maintenance cost savings that will eventually be passed to Ameren Missouri's customers, as well as allow faster remote disconnection/reconnection and provide additional safety for Company personnel.</p>	<p>As described briefly above and in more detail in the <i>Report</i>, customers will still receive multiple forms of communications from Ameren Missouri containing the required information regarding disconnection and reconnection. This information will also remain accessible 24 hours a day via Ameren Missouri's website. While the customer will not have personal contact (or attempts of personal contact) with Company representatives on their premises, the customer will receive the required information through several other channels.</p>
<p>VARIANCE: 20 CSR 4240-13.055(3)(D): Notice Requirements. From November 1 through March 31, prior to discontinuance of service due to nonpayment, the utility shall –</p> <p>(D) Make a personal contact on the premises with a registered elderly or handicapped customer or some member of the family above the age of fifteen (15) years, at the time of the discontinuance...</p>		<p>Further, Ameren Missouri will perform an additional notification via the preferred and/or default method, as indicated on the customer's account, the day of disconnection.</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.

⁴ Ameren Missouri did not originally request a variance from this rule because of its attempt of contact "in the manner specified by" 20 CSR 4240-13.050(9). Since the Company was requesting a waiver of 20 CSR 4240-13.050(9), then presumably, that waiver would also apply here. However, after discussing this position during negotiations, Ameren Missouri indicated it would request a waiver of this provision in an abundance of caution.

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.

III. Conclusion

10. As noted above, Ameren Missouri provides this supplement to its previous application to address two waivers omitted from the original filing so that the issues regarding personal contact with customers described in both the *Original Application* and *Supplemental Application* can be efficiently addressed in the same proceeding.

WHEREFORE, Ameren Missouri respectfully requests that the Commission grant the requested variances, which would allow the Company to more efficiently and effectively deploy its AMI infrastructure, as described above.

Respectfully Submitted,

/s/ Paula N. Johnson

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**ATTORNEYS FOR UNION ELECTRIC
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CERTIFICATE OF SERVICE

I do hereby certify that a true and correct copy of the foregoing Application has been e-mailed, this 12th day of June, 2020, to the parties of record.

/s/ Paula N. Johnson