

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

<b>In the Matter of a Proposed Rulemaking to</b>	)	
<b>Amend 4 CSR 240-13 Service and Billing</b>	)	<b><u>File No. AX-2013-0091</u></b>
<b>Practices for Residential Customers</b>	)	

**Ameren Missouri’s Response to Commission Requests for Information**

COMES NOW, Union Electric Company, d/b/a Ameren Missouri (“Ameren Missouri” or “Company”), and for its Response to Commission Request for Information in this proceeding, states as follows:

1. On August 29, 2012, the Commission issued its Notice of Finding of Necessity stating the Commission opened this file to amend the existing rules in Chapter 4 CSR 240-13 setting out the service and billing practices for electric, natural gas and water utilities serving residential customers. The Commission sought the comments of interested persons as to whether the amendments were appropriately designed and written.

2. On August 1, 2013, the Commission submitted twelve proposed rulemakings to the Secretary of State—Administrative Rules Division.

3. On September 3, 2013, the Secretary of State published the proposed amendments to the rules in the Missouri Register for comment. The proposed amendment for each rule provided the opportunity to file comments regarding the rule in this file no later than October 7, 2013.

4. On October 7, 2013, the Company joined with Laclede Gas Company and The Empire District Electric Company filing as comments to the proposed amendments to Chapter 4 CSR 240-13 the pleading, Comments of Missouri Utilities.

5. On October 10, 2013, the Commission held a rulemaking hearing. At the hearing, Ms. Cathy Hart, Customer Services Supervisor for the Company, provided comments to a number of the proposed amendments, as well as comments to the comments and further amendments proposed by various parties.

**Data Regarding Medical Hardship Extensions**

6. One issue in particular addressed by Ms. Hart was the Commission’s proposed amendment 4 CSR 240-13.050(11), which would replace current rule 4 CSR 240-13.050(9) regarding postponing discontinuance of service where the discontinuance will aggravate an

existing medical emergency. The proposed amendment, generally speaking, calls for deferring discontinuance or reconnection for up to 28 days when a customer provides a physician's certificate that certifies that discontinuance of the utility's service would rapidly either give rise to a substantial risk of death or gravely impair the health of the utility customer or other permanent household resident.

7. Ms. Hart testified that the Company opposed subsection (11) as proposed, in part because there is no obvious need for any changes to the current practice of utilities. She described the Company's medical registry program and medical hardship extension program. Under the medical hardship extension program, once every twelve rolling months a customer may receive up to an additional full billing cycle to pay his or her bill, if the customer provides a letter from his or her doctor on the doctor's letterhead, indicating that the customer has an existing medical emergency that will be aggravated by a discontinuance of service.

8. In response, a Commissioner asked Ms. Hart how many requests the Company receives for medical hardship extensions. Ms. Hart indicated at least several requests are made per day, but was not able to provide the Commission with exact figures during her comments. She offered to gather and submit the data in this proceeding.

9. The Company's customer service and billing records reflect that for the past 6 months, the number of medical hardship extensions granted by the Company per month ranged from a low of 422, for the month of April 2013, to a high of 764, for the month of September 2013. The Company is not aware of any informal or formal complaint filed by a customer during that time period or any other time period, relating to the grant, or refusal, or the operation, generally, of a Company medical hardship extension. The Company hopes this information is helpful to the Commission.

### **Company Pay Agents**

10. Another issue addressed by Ms. Hart at the hearing was the Office of Public Counsel's proposal to amend 4 CSR 240-13.020, to add a subsection banning formal relationships with what the Office of Public Counsel referred to as predatory lenders, which included payday loan companies. Ms. Hart noted that the Company opposes the proposed rule because although such businesses may not be the Company's preferred pay agents, in some areas, the choice for the Company has been to have a business that does this type of lending act as a pay agent, or have no pay agent in the area at all. In the event the Company chose not to use

such a pay agent, customers may have been deprived of a place they could go to pay their bill, which makes them less likely to keep current and more likely to face late fees and possible disconnections.

11. At least two other commenters later suggested that surely the Company could engage financial institutions such as local banks, and retailers, specifically Wal-Mart, as pay agents, instead of payday lenders. Ms. Gay Fred advised the Company and other utilities, during a workshop held on October 17, 2013, that the Commission has requested information from the utilities regarding each utility's use (or non-use) of payday loan companies and currency exchange companies as authorized pay agents.

12. While the Company has previously had up to two pay station sites in payday loan businesses in Missouri, at the current time the Company has no formal agreements with any payday loan companies to accept payments for the Company, and is not otherwise aware of any particular payday loan companies that may be making payments on customers' behalf. At the current time the Company has a formal pay agent relationship with one currency exchange company. As to financial institutions, the Company has a number of financial institutions throughout its service territory that do accept payments on the Company's behalf, but not all financial institutions are willing to become pay agents for the Company. As to entering into a formal pay agent relationship with Wal-Mart, the Company has tried on numerous occasions to enter into such a relationship with the retailer, but to date Wal-Mart has not agreed to install necessary Company equipment in its stores. The Company hopes this information is helpful to the Commission.

13. The Company urges the Commission also to take administrative notice of the testimony of Ameren employee Carole Hunt given on September 9, 2009, in Case No. AX-2010-0061, wherein Ms. Hunt provided facts about the Company's authorized pay agent relationships and discussed why the option of making payments through a pay agent is important to many of the Company's customers. See Tr., p. 33, l. 4-p. 38, l. 15.

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**CERTIFICATE OF SERVICE**

I do hereby certify that a true and correct copy of the foregoing document has been emailed this 18th day of October, 2013 to all counsel of record in this proceeding.

/s/ Sarah E. Giboney