

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

In the Matter of a Motion for an Emergency)
Order Establishing a Temporary Moratorium)
on Utility Discontinuances to Protect Public)
Health and Safety by Mitigating the Spread)
of the COVID -19 Pandemic.) File No. AO-2021-0164

**AMEREN MISSOURI’S REPLY TO CONSUMERS COUNCIL’S REQUEST FOR A
RESIDENTIAL DISCONNECTION MORATORIUM**

COMES NOW Union Electric Company d/b/a Ameren Missouri (“Ameren Missouri” or “Company”), and hereby files its reply to the Consumers Council of Missouri (“CCM”) request for a moratorium on residential disconnections, along with other related relief, as follows:

1. On December 7, 2020, CCM filed its *Motion for an Emergency Order and Request for Expedited Treatment (“Motion”)*, which seeks a moratorium on residential disconnections through March 31, 2020.

2. On December 8, 2020, the Missouri Public Service Commission (“MPSC”) issued an order allowing for responses to be filed by December 14, 2020.

3. Ameren Missouri shares in the concern for residential customers raised by the CCM *Motion*. There is no doubt that the COVID-19 Pandemic has financially impacted many customers, both directly and indirectly. Ameren Missouri has consistently and earnestly endeavored to be a good corporate citizen during these difficult times. We have sought a balanced approach to help our customers keep the power on without accumulating unmanageable arrearages. We have focused much of this effort on assisting low-income customers and those directly impacted by COVID-19. None of these actions were required by the Commission; they were all undertaken voluntarily (although sometimes Commission action was necessary to allow a change to be made). Given the consistently demonstrated care for and assistance to the communities served by Ameren Missouri, as

well as other utilities in the state of Missouri, it is unnecessary for the Commission to impose a residential disconnection moratorium.

**ACTION TAKEN BY AMEREN MISSOURI TO ASSIST
CUSTOMERS DURING THE COVID-19 PANDEMIC**

4. In mid-March, fairly immediately after recognition of the Pandemic situation in our area, Ameren Missouri took action. We voluntarily enacted a disconnection moratorium for all customer accounts and waived late fees. We reconnected recently disconnected customers at no charge.¹ These steps were important and provided immediate relief to customers at a time when the Company did not have other solutions available.

5. Over time and while the voluntary disconnection moratorium was in place, however, we worked to develop additional ways to help our customers. We met regularly with the social service agencies to discuss their ideas of how to help our customers. We began aggressive customer outreach, using email, letters, telephone calls, press releases, and social media to inform customers of programs available to assist them. We provided millions of dollars in various types of energy assistance to help mitigate accumulating customer arrearages. We moved funding between programs in order to increase the amount of bill assistance funding we could make available. We modified existing assistance programs to increase the number of customers who could participate. We made changes to our low-income energy efficiency programs to reach more customers in need. Ameren Missouri has been thoughtful and deliberate in its efforts to help our customers deal with the financial impacts of COVID-19. The initial disconnection moratorium gave us the time to develop and implement all of these measures.

¹ As appropriate, we obtained Commission approval of variances to applicable tariff and rule provisions to allow these actions to occur.

6. Attached to this pleading as Appendix A is a fact sheet laying out the different actions the Company has taken on behalf of its customers in light of the pandemic. A full listing can be found in the *Response* filed by Ameren Missouri on August 31st in the Commission's workshop on COVID-19, File No. AW-2020-0356.² The vast majority of the listed programs are still available to our customers in need.

7. Ameren Missouri has also diligently kept the Commission, its Staff, and the Office of the Public Counsel ("OPC") informed about its efforts to assist customers. Throughout the pandemic, there have been regular phone calls with all of the utilities, Staff, OPC, and the Missouri Family Support division that oversees LIHEAP. Ameren Missouri has found these conversations helpful as participants have shared ideas and experiences.

8. The past nine months have deepened our understanding of how to help customers through this extraordinary event. During the voluntary disconnection moratorium, our experience was that many customers did not seek payment assistance and options, at least in part, because there was no incentive to do so. This was concerning as it meant their past-due balances grew while available assistance went unused, and the number of payment plans entered into dropped significantly. Allowing arrearages to grow does not help our customers in the long term, nor does it help Ameren Missouri.

AMEREN MISSOURI'S CURRENT DISCONNECTION PRACTICE

9. As the Commission is aware, Ameren Missouri has now discontinued its self-imposed disconnect and late fee moratorium for residential and commercial customers. However, this decision should not be construed as the Company handling disconnections in exactly the same manner as it had prior to the Pandemic.

² EFIS Item No. 32.

10. At the same time as the self-imposed moratorium was lifted, the Company implemented other changes to help customers. The Company is offering payment plans with more generous terms than would normally be available. The Company has deferred the billing of deposits until further notice. We are allowing additional time for LIHEAP applications to be processed when needed. We released an additional \$500,000 through our Clean Slate program on October 21, 2020. The Company adjusted its approach in the field when performing disconnections to allow time for customers to make payments and to allow for arrangements in situations we normally would not.

11. Ameren Missouri stands ready to help our customers in need, but those customers must reach out for help in order for us to do so. Disconnection notices are often what it takes for customers to make that call. Once a customer places that call with our customer service personnel, we can work to help them find available funding to reduce or pay off their delinquent bill. We can set them up on a payment plan to give them more time to address a delinquency. The Company can connect customers with our Community Action Agency partners, and other organizations with a goal of preventing disconnections or reconnecting customers. There is still LIHEAP and CARES ACT funding available for customer assistance and Ameren Missouri still has nearly one million dollars of Keeping Current funding available for those program participants. We continue to reach out to our customers and to communicate the availability of these funds. We are making telephone calls, sending emails, speaking through the media (TV, radio, and print), and we are planning a large postcard mailing that will be targeted to approximately half of our customer base. Disconnection is treated as an absolute last resort and typically only occurs when a customer takes no action to contact the Company, even after receiving multiple communications designed to encourage them to do so.

12. We are encouraged because Ameren Missouri's approach is working. The total number of disconnections after August of this year are lower than they were for the same period in 2019. Ameren Missouri, as previously stated, has made a concerted effort to get the word out about the available options. Any additional efforts should be focused on helping to bolster customer awareness of assistance available to them. On the other hand, a blanket moratorium at this time creates the wrong incentive for many customers and will likely lead to greater balances for customers who can afford it the least. This is not the answer, especially given that the Company now has other avenues available to assist our customers in need.

13. While not a protection specific to COVID-19, disconnections by all utilities regulated by the Commission are subject to the Cold Weather Rule requirements between November 1st and March 31st. This alone reduces the number of disconnections that happens during any Cold Weather Rule period. Finally, Ameren Missouri will not be disconnecting from December 15th through January 5th due to the holidays.

SUMMARY

14. Ameren Missouri shares many of the concerns for its customers voiced in CCM's *Motion*, but we disagree with the solution presented. Ameren Missouri is not ignoring our customers' needs during this crisis. The Commission is not being asked to force a necessary solution upon an uncooperative utility. There is simply no need to impose the requested extraordinary remedy when the actions currently taken by the Company are already working. The Commission can and should continue to work with the utilities it regulates, and together, promote continued, workable, and beneficial responses to this COVID-19 Pandemic.

WHEREFORE, Ameren Missouri respectfully requests that the Missouri Public Service Commission deny the request of Consumers Council of Missouri, as it is not necessary or in the long term interest of residential customers.

Respectfully submitted,

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CERTIFICATE OF SERVICE

The undersigned hereby certifies that the foregoing reply has been served on counsel for the parties of record by electronic mail on this 14th day of December, 2020.

/s/ Wendy Tatro

Wendy K. Tatro

Ameren Missouri COVID-19 Pandemic Response Customer Support

\$5M in Energy Assistance for Residential and Small Business Customers

- **\$1M Ameren Missouri Coronavirus Income Relief Program**
 - Launched March 19 – May 18
 - \$500K was made available to workers in the \$30K to \$60K income range who normally did not qualify for energy assistance, but whose income was impacted by COVID-19 due to job loss or reduced hours. Eligible customers received a \$250 bill credit.
 - \$500K was made available through Heat Up Missouri to provide seniors, disabled and financially challenged customers with income up to \$29,000
- **\$3M Ameren Missouri Clean Slate Energy Assistance Program**
 - Launched on June 3, 2020 – currently available while funds last
 - Dedicated to helping our residential electric customers with past due balances pay off their utility bills
 - Available through LIHEAP agencies across Missouri and Cool Down Missouri
 - Customers pay 25% of their balance and Clean Slate covers the rest
- **\$500K Ameren Missouri COVID-19 Small Business Relief Program**
 - Launched July 6, 2020 – currently available while funds last
 - Provided \$500K in energy assistance to small businesses and nonprofit organizations with 50 or fewer employees who have been impacted by the COVID-19 pandemic
 - To be eligible, businesses must have 50 or few employees and must be registered through the Secretary of State website
 - Eligible businesses receive a \$250 bill credit
- *Update* **\$500K Clean Slate Fall/Winter Energy Assistance – funding is still available as of 12/11/20**
 - Launched on October 21, 2020
 - Provides up to \$500 after customers pay 25% of their past due balance
 - Remaining balance (if any) can be placed on a payment agreement

Collection Policy Actions

- **March 14** - Proactively suspended disconnections for non-pay and late payment fees for all customers
- Began offering new and expanded payment options for residential and business customers
- Replaced disconnect notices with past due reminder letters to help with payments and LIHEAP eligibility
- **July 15** - Resumed late payment fees and disconnects for non-pay for business customers; provided assistance through the Small Business Relief Assistance Program and payment agreement options
- **August 3** - Disconnections and late payment fees resumed for residential customers – worked with customers in threat of disconnection by removing their account from collections and stopping the disconnection when the customer indicated they had applied for energy assistance

Ameren Missouri COVID-19 Pandemic Response Customer Support

Customer and Community Communications

- Additional ongoing communications are being provided to customers regarding availability of new and existing energy assistance and payment agreement options as well as products and services to help customers manage their bill:
 - This information was shared through bill inserts, social media, news media, emails and letters to customers
 - The Ameren Missouri Website developed a COVID-19 Pandemic Response page with information and answers to frequently asked questions
 - A webpage with information and links to financial resources for businesses, including the Ameren Missouri Small Business Relief program and links to State and Federal programs was developed and made available on the Ameren Missouri website
 - Regular calls are being held with energy assistance partner agencies and other social service agencies to coordinate assistance to customers
 - Ameren Missouri participates on a weekly Missouri All -Utility Call that's moderated by the Office of Public Council to share details about actions being taken to support customers during the COVID-19 pandemic. Utilities and state agencies share actions, key learnings, data and plans, as well as best practices

Additional Support

- *Update* Ameren Missouri actively promotes **Missouri's Low Income Home Energy Assistance Program (LIHEAP)**. LIHEAP funding includes \$77M in Federal funding for the 2020-2021 plus \$20M in CARES Act funding; LIHEAP helps low-income customers and customers with income loss due to COVID19 with income at or below 135% of the federal poverty level – **funding is still available as of 12/11/20**
- *Update* **Ameren Missouri's Keeping Current Program** provides arrearage forgiveness and monthly bill credits with on-time payments for customers with income less than 150% of the federal poverty level – Funding for 2020 - \$1.8M; funding for 2021 - \$2M – **funding is still available as of 12/11/20**
- Ameren Missouri donated 1000 energy efficient air conditioners to Cooldownmissouri.org on June 3. The units will be provided to low-income seniors and disabled customers across Missouri
- Cool Down Missouri is working with Ameren Missouri to help customers with their bills. Cool Down Missouri received \$3M in CARES Act funding to help St. Louis City customers, \$1.8M in CARES funding to assist St. Louis County customers and an additional \$1M (HUD) to also assist St. Louis County customers
- Through the COVID 19 Advisor Empowerment Program, Ameren Missouri Customer Care Advisors were allotted over \$40K in energy assistance funds in March of 2020 to help residential customers at the onset of the pandemic and business customers upon resumption of disconnections, in need of assistance due to COVID 19. An additional allocation of \$45K has been provided to advisors to assistance customers through the Joy of Giving Campaign which launched on November 23, 2020.

