

**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 Decrease Its Revenues for) File No. ER-2019-0335
Electric Service.)

RENEW MISSOURI’S RESPONSE TO COMMISSION ORDER

COMES NOW Renew Missouri Advocates (“Renew Missouri”) and offers this response to the Commission’s March 5th, Order Directing Responses:

Renew Missouri was not a signatory to the Non-unanimous Stipulation and Agreement (“Stipulation”) or the Corrected version filed on March 2nd. However, Renew Missouri was aware of the provisions contained in the Stipulation and indicated it did not object to the terms as a way to resolve this rate case. Given that background, since the Commission has asked each party to answer whether it would accept alternative stipulation terms, as a non-objecting party Renew Missouri responds below.

Item 1. *Allowing residential net-metering customers to select any rate options offered to other residential customers.*

Renew Missouri Response:

Renew Missouri would accept this modification to the extent a change is necessary. Allowing net-metered customers to voluntarily select any rate option offered to other residential customers would be consistent with the state policies to permit and encourage Missourians to install solar systems.¹ Renew Missouri supports the ability of these customers to realize the full benefits of their systems and would support their ability to opt-in to the rate offers if they choose.

If the Stipulation were to be approved as it is currently filed, net-metered customers would be able to participate in only the standard non-AMI rates and eventually the “default”

¹ See the Net Metering and Easy Connection Act in Section 386.890 RSMo, the Solar Rebates under Section 393.1030 RSMo, and the additional Solar Rebates under Section 393.1670 RSMo.

daytime/overnight AMI TOU rate. The Company's current tariffs for net-metering (Sheet No. 171.1 paragraph 2) provide that "Net metering cannot be elected in conjunction with 'Optional Time-of-Day-Rate' service of any of Company's rate schedule." However, since the "default" TOU does not yet have tariff sheets, customers can elect that rate if the compliance tariff sheets permit. For the other three new rates – EV savers, Smart Savers TOU, and the three-part demand charge Super Savers – the Stipulation provides that the rates will be implemented as described in the company's direct testimony, which excluded net-metered customers.

In regard to whether or not each new rate offering would allow the net metered customer to realize the full benefit of a solar investment the evidence in this case does not offer a definitive answer. The provisions in Stipulation paragraph 27.d.ii. outlining additional reporting requirements will provide the parties and the Commission the information necessary to make the determination about which rate is best for net-metered customers in future cases. Specifically, the Company will be required to compile and provide a billing analysis of net-metered solar customers comparing the bill impact if that customer had taken service under 1) the standard non-AMI rates, 2) the EV savers rate, 3) the Smart Savers TOU rate, 4) the default daytime/overnight TOU rate, and 5) the three part rate with a demand charge. Renew Missouri expects the analysis to show that a three-part rate with a demand charge would be detrimental to net-metered solar customers, and so, the inclusion of the commitment by Ameren Missouri not to propose a demand charge rate on any basis other than opt-in for a period of years is a positive step.

With that information in mind, Renew Missouri would accept a modification allowing net metered customers to opt-in to each of the new rate offerings so long as the customer would not be required to take service under a rate with a three-part demand charge.

Item 2. *Enhancing the default time of use (TOU) rate so that the peak period is significantly shorter and has a much greater pricing differential relative to the off-peak period than the currently proposed default TOU rate.*

Renew Missouri Response:

Renew Missouri does not take a position on this modification but notes that the Stipulation as filed already provides customers with AMI meters the option to participate in the Smart Savers TOU rate that has on-peak, intermediate, and off-peak pricing with rate differentials greater than the new “default” TOU presented.

Item 3. *Submitting to the Commission timely status reports after the monthly customer engagement meetings identified in Paragraph 27 of the Corrected Non-Unanimous Stipulation and Agreement. The status reports would detail the agreed to educational/communication programs. In addition, Ameren Missouri would present at Agenda in either June or July 2020, details of the customer outreach plans prior to their initiation.*

Renew Missouri Response:

Renew Missouri would support this modification.

WHEREFORE, Renew Missouri submits its *Response to Commission Order*.

Respectfully Submitted,

/s/ Tim Opitz

Tim Opitz, Mo. Bar No. 65082
409 Vandiver Drive, Building 5, Ste. 205
Columbia, MO 65202
T: (573) 825-1796
F: (573) 303-5633
tim@renewmo.org

Certificate of Service

I hereby certify that copies of the foregoing have been mailed, emailed or hand-delivered to all counsel of record this 9th day of March 2020:

/s/ Tim Opitz
