

**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 Adjust its) No. ER-2022-0337
Revenues for Electric Service)

**RENEW MISSOURI'S STATEMENT OF POSITION
AND MOTION FOR LEAVE TO LATE FILE**

COMES NOW Renew Missouri Advocates ("Renew Missouri") and herein submits its Statement of Position on the List of Issues filed on March 22, 2023 in the above-captioned case. In addition, Renew Missouri herein submits its Motion for Leave to Late File its Statement of Position. For each of the issues not listed below, Renew Missouri takes no position at this time, but reserves the right to take a position at a later date.

For its Statement of Position, Renew Missouri states the following:

4. *Class Cost of Service, Revenue Allocation, Rate Design and Rate Switching Tracker.*

C. Which party's Class Cost of Service Study should be used in this case and used as a starting point for the non-residential rate design working case agreed to by the parties to the Company's last electric general rate case, File No. ER-2021-0240?

Renew Missouri Position: The Commission should use Staff's class cost-of-service study.

D. How should any rate increase be allocated to the several customer classes?

Renew Missouri Position: The Commission should not order any revenue neutral shift across classes and any rate increase should be enforced as an equivalent percentage increase

across all classes, with the exception that the company-owned lighting rates should remain constant.

E. What should the customer charges associated with the Residential Class rate plans be?

Renew Missouri Position: The customer charge should remain at \$9.00 for all residential customers, regardless of the chosen rate option. Renew Missouri believes that the Staff's Class Cost-of-Service study supports a \$9.00 customer charge. Renew Missouri opposes increases to the residential customer charge for several reasons: 1) higher customer charges disincentivize conservation and energy efficiency; 2) higher customer charges reduce the potential of distributed generation and other load shifting technologies; and 3) higher customer charges penalize low energy users and have a more severe impact on low-income customers. Keeping the fixed customer charge low will give all residential customers more control over their monthly bills.

E. What should the customer charges associated with the Residential Class rate plans be?

a. If the customer charges for the Ultimate Saver and Smart Saver Plans are discounted relative to other residential rate plans, should a minimum demand charge be imposed with customers to be fully educated on the minimum demand charge?

Renew Missouri position: Renew Missouri opposes any imposition of a demand charge on residential customers. Demand charges are inherently difficult for the average residential customer to understand, and would be an entirely new concept to most customers. If the

Commission decides to approve the Company's proposed differentiated customer charge with discounts for the Ultimate Saver and Smart Saver plans, they should do so without imposing a new minimum demand charge.

F. What changes should be made, if any, to the Residential rate plans offered by the Company?

a. Should Staff's proposal to eliminate the Anytime (flat) rate option for any Residential customers who have an AMI meter be approved?

Renew Missouri position: No. Renew Missouri opposes any rate option becoming the default rate option other than a flat rate (e.g. Anytime User).

b. What changes, if any, should be made to the deployment of residential ToU rate plans?

Renew Missouri position: Renew Missouri strongly urges the Commission to order the Company to offer its residential TOU rate plans to all residential customers, especially customers with solar systems taking service under the Company's net-metering tariff and customers with battery storage systems. Ameren Missouri has a legal duty under Section 386.890, RSMo. to offer the same "rate structure" to net-metering customers as they offer to non-net-metering customers. This legal duty remains, regardless of the difficulties of integrating on and off-peak rate schedules with net-metering. Other jurisdictions have successfully integrated these concepts, and parties in Missouri could work together to find solutions. The Commission should look to Evergy's most recent rate case (File No. ER-2022-01290), in which Evergy committed to developing a report that examines the technical, billing, and legal barriers to offering further

TOU rate options to residential customer-generators with net-metering or interconnection agreements. The Commission could order Ameren Missouri to do the same in this case.

In addition to net-metering customers, there are customers with battery storage systems who could benefit from the Company's TOU rate options. One of the primary benefits of battery storage is the ability to "shift" usage from one period to another, which is precisely the goal being sought with TOU rates. Battery storage offers an opportunity to use technology specifically designed to accomplish the aim of TOU rates, yet the Company does not allow battery storage customers access to these rate options. Ameren Missouri offers no explanation for why battery storage customers cannot take service under a TOU rate plan, neither in Direct, Rebuttal, or Surrebuttal testimony, nor in responses to data requests on the subject. None of the difficulties or legal disputes involved in integrating net-metering with TOU rates apply to battery storage. The only conclusion one can draw is that Ameren Missouri is concerned about the reductions in revenue that may result from batteries being used to shift sales from on-peak to off-peak periods. The Commission has a clear opportunity to make a value judgment between: 1) keeping the Company's revenues high at all costs on the one hand, and 2) utilizing available technology to further the goal of existing TOU rate options, allowing for significant system savings through load shifting, and providing customers greater control over their bills. The Commission should order Ameren Missouri to offer its TOU rate plans to customers with battery storage systems.

14. Low-Income and Other Customer Programs.

A. *Should the changes to the Keeping Current/Keeping Cool Program proposed by CCM be approved?*

Renew Missouri Position: Yes. Funding for the Keeping Current/Keeping Cool Program should be increased to \$5 million, to be shared equally by the ratepayers and shareholders, consistent with past precedent. Keeping Current program changes should be ordered consistent with the direct testimony of Jackie Hutchinson, pp. 11-21, including an increase in the compensation for participating agencies to \$50 per successful application. Ameren Missouri should also be ordered to develop a plan, in consultation with the Keeping Current collaborative, designed to reduce the number of involuntary residential disconnections by 10% in the 20 zip codes of the Company's service area which have the highest collection activity, over a 2-year period, or until the next Ameren Missouri general rate case (Hutchinson Direct, pp. 19-20; Hutchinson Rebuttal pp. 4-7).

B. Should the changes to the Keeping Current/Keeping Cool Program proposed by OPC be approved?

Renew Missouri Position: Yes. The recommended program design and tariff changes are consistent with feedback from the Keeping Current Collaborative and accurately adjust for the dynamic changes that the Company's most vulnerable customers are currently experiencing (Marke Direct p. 31).

Motion for Leave to Late File Statement of Position

In support of its Motion for Leave to Late File this Statement of Position, Renew Missouri states that other obligations caused its counsel to be unable to meet the deadline of March 27th, and Renew Missouri asks that the Commission grant it the ability to put its Statement of Position on the record in this case.

WHEREFORE, Renew Missouri respectfully requests that the Commission grant it leave to file the above Statement of Position out of time and allow its Statement of Position to be made part of the record in this case.

Respectfully Submitted,

/s/

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Dated: March 28, 2023