

**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.            )

**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 variances from portions of 20 CSR 4240 Chapter 13, and provides exemplar tariffs implementing those variances.<sup>1</sup> In support of this *Application for Variances* (“*Application*”), the Company respectfully represents and states:

**INTRODUCTION**

1. As part of its Smart Energy Plan, Ameren Missouri is implementing various “smart” technologies, including Advanced Metering Infrastructure (“AMI”). Included with this *Application* is a *Smart Meter Plan Report* (“*Report*”), which provides additional details regarding the Company's planned implementation and the anticipated benefits of AMI. That *Report* is adopted by reference as if fully set forth herein. In summary, AMI meters will provide Ameren Missouri with more timely and granular data regarding customer usage patterns, and will allow two-way communications between the Company and the meter. These capabilities provide advantages to

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<sup>1</sup> Ameren Missouri includes an exemplar tariff revision for two matters that do not require associated variances in order to provide a more complete insight into what will be required to fully implement AMI. While Ameren Missouri does not believe variances are required to enable these tariff revisions, it was logical to submit this proposed revisions in exemplar form to enable a complete discussion and vetting of what is required for full AMI implementation. If this *Application* and the associated *Report* are approved, the Company will submit compliance tariffs to implement the tariff changes ultimately enabled by this proceeding.

both the Company and the customer, such as enabling the Company to offer to customers a greater portfolio of innovative, beneficial, and efficient rates and rate structures, providing insights into customer usage in different and dynamic new ways, and potentially enabling greater utilization of smart devices (thermostats, electric vehicle chargers, appliances, etc.) within the home. AMI will also enable remote connections and disconnections and improve, among other things, outage detection and notification, voltage monitoring capabilities, meter data integrity, and revenue protection through detection of theft of service.

2. Ameren Missouri intends to begin AMI deployment in July 2020, continuing through 2025 until AMI metering has been installed for all of the Company's approximately 1.3 million customers, except those choosing to decline AMI metering. Specifically, the Company anticipates AMI deployment consistent with the following timetable:

<b>Meter Deployment Schedule (% Complete)</b>	<b>2020</b>	<b>2021</b>	<b>2022</b>	<b>2023</b>	<b>2024</b>	<b>2025</b>
	<b>10%</b>	<b>28%</b>	<b>47%</b>	<b>65%</b>	<b>83%</b>	<b>100%</b>

3. In anticipation of the deployment of the first 10% in 2020, the Company has already begun developing the IT infrastructure to support and utilize the AMI network. In order to appropriately develop this infrastructure, Ameren Missouri needs to know if certain variances can be obtained that enable certain AMI metering benefits. Because the IT infrastructure development is happening now, Commission action is critical. Accordingly, the Company submits this *Application* asking for the regulation and tariff variances necessary to realize AMI's potential. While Ameren Missouri is not requesting expedited treatment of this request, a timely decision, preferably by January 3, 2020, will foster a more productive IT infrastructure development.

4. This Application has been divided into the following sections:

I. 20 CSR 4240-2.060(1), (A) through (M)

II. Chapter 13 Variances Requested

A. 20 CSR 4240-13.065

B. Disconnections and Reconnections

C. Beginning and Ending Meter Readings

D. Customer Meter Readings

III. Additional Tariff Revisions

A. Estimation Routines

B. Customer Opt-Out

**I. 20 CSR 4240-2.060(1), (A) through (M)**

Paragraph (A) - Applicant

5. Company is a Missouri corporation doing business under the fictitious name of Ameren Missouri, organized and existing under the laws of the State of Missouri, in good standing in all respects, with its principal office and place of business located at One Ameren Plaza, 1901 Chouteau Avenue, St. Louis, Missouri 63103. Company is engaged in providing electric and gas utility services in portions of Missouri as a public utility under the jurisdiction of the Commission. Company is a subsidiary of Ameren Corporation.

Paragraph (B) – Articles of Incorporation; Paragraph (E) – Fictitious Name; Paragraph (G) – Information Previously Submitted; Paragraph (H) – Character of Business<sup>2</sup>

6. Company previously submitted to the Commission a certified copy of its Articles of Incorporation (See Case No. EA-87-105). Company previously submitted its Fictitious Name Registration as filed with the Missouri Secretary of State's Office in File No. EA-2019-0181.

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<sup>2</sup> Paragraphs (C), (D), and (F) do not apply to Ameren Missouri.

Company attached a copy of its Certificate of Corporate Good Standing as Schedule 1 to this pleading. These documents are incorporated by reference and made a part of this Application for all purposes.

Paragraph I – Correspondence and Communication

7. Correspondence, communications, orders and decisions in regard to this *Application* should be directed to:

Thomas M. Byrne  
Senior Director Regulatory Affairs  
1901 Chouteau Avenue, MC-1450  
P.O. Box 66149, MC-1450  
St. Louis, Missouri 63101-6149  
(314) 554-2514 (Telephone)  
[tbyrne@ameren.com](mailto:tbyrne@ameren.com)

Paragraph (K) – Actions, Judgments, and Decisions; Paragraph (L) – Fees<sup>3</sup>

8. The Company has no final unsatisfied judgments or decisions against it from any state or federal agency or court that involve customer service or rates that have occurred within three years of the date of this *Application*. By the nature of its business, the Company has, from time-to-time, pending actions in state and federal agencies and courts involving customer service or rates. The Company has no annual report or assessment fees overdue to this Commission.

Paragraph (M) – Verification

9. A verification in support of this *Application* by an authorized individual is included as Schedule 2.

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<sup>3</sup> Paragraph (J) does not apply to the Ameren Missouri.

## II. Chapter 13 Variances Requested

10. Ameren Missouri notes that all requested variances contained in Section III of this *Application* are only for customers who have an AMI meter installed as the five-year deployment period progresses, and in some cases, only AMI customers who avail themselves of time-of-use ("TOU") rates. As it relates to the variances requested in Table 2 below, Ameren Missouri will 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)

11. 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 *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, which is ongoing), 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 *Application* in the relevant tariffs.

### B. Disconnections and Reconnections

12. 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 for our crews, allows for quick or easily scheduled connection or disconnection of service at the convenience of the customer, and saves customers money. These benefits, including the cost savings of approximately \$43 million over 15 years in the cost of truck rolls alone, are described in more detail in the *Report*. However,

current Commission rules and Company tariffs require a large measure of costly in-person interactions when it comes to disconnections and reconnections.

13. If the variances necessary for remote disconnections and reconnections are granted, then Ameren Missouri proposes to reduce its reconnection fee for AMI customers from \$30 to \$10, since their reconnection will not typically cause truck roll costs to the Company. While the Company still expects to incur some costs – both administrative and through truck rolls should automated disconnection or reconnection fail – we do not expect those costs to be significant. A 2/3 reduction in reconnection costs pending future study of the actual costs saved is a fair compromise that will allow customers to immediately feel the cost relief provided by this new disconnection/reconnection process enabled by AMI and still provide the Company some coverage of its remaining operating costs. An appropriate level for this fee can be re-examined once the Company has more experience with the process.

14. The Commission's disconnection rules also require a door knock or door hanger at the time of disconnection. This also requires a truck roll, which means the benefits of remote disconnection are irrelevant if this rule is not also waived. Customers will still have multiple means to access Ameren Missouri's disconnection and reconnection information, even if truck rolls - and any associated door hangers - 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. The Company will send 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 check outage calls from customers to determine whether the outage is in fact a disconnection. While the door hanger may be discontinued, numerous other communications channels remain in place to make sure the customers are able to address disconnections quickly and efficiently. That said, Ameren Missouri will add one more communication attempt, via either the customer's preferred method or by default method (telephone) if no preferred method of communication associated with their account is indicated, of communication associated with their account on the day that the disconnection takes place.

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

**Table 2 – Variances and Revisions Regarding Disconnections and Reconnections**

<b>Rule Variance Variance or Tariff Revision Requested<sup>i, ii</sup></b>	<b>Rationale<sup>iii</sup></b>	<b>Justification<sup>iv</sup></b>
<b>Door Hangers</b>	As described briefly above and in more detail in the <i>Report</i> , discontinuing the use of door hangers will result in lower costs for reconnecting customers through the reduction of the reconnection fee and operations and maintenance cost savings for all customers 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.	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
<b>REVISION: Tariff Sheet No. 143, General Rules and Regulations,</b>		

Rule Variance or Tariff Revision Requested <sup>i, ii</sup>	Rationale <sup>iii</sup>	Justification <sup>iv</sup>
<p><b>VII. Disconnection and Reconnection of Service – Residential Customer Contact and Notice of Disconnection - ...</b> 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.</p> <p><b>REVISION: Tariff Sheet No. 144, General Rules and Regulations, VII. Disconnection and Reconnection of Service – Residential Customer Contact and Notice of Disconnection -</b> 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.</p>		<p>website. While the customer will not receive this information via the door hanger, the customer will receive the required information through several other channels.</p> <p>Further, Ameren Missouri will perform an additional notification via the preferred or default method, as indicated on the customer's account, the day of disconnection.</p>
<p><b>Reduction of Reconnection Fee for AMI Customers</b></p> <p><b>REVISION: Tariff Sheet No. 145, General Rules and Regulations, VII. Disconnection and Reconnection of Service – Reconnection of Service - ...</b>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</p>	<p>As described briefly above and in more detail in the <i>Report</i>, AMI will provide the ability to reconnect service remotely. The prior reconnection fee of \$30 only covered a portion of the truck roll cost; however in this case, remote reconnection should represent much lower costs than the typical operations and</p>	<p>Because no truck rolls are involved, it is appropriate to lower the reconnection fee from \$30 for customers to one representing more closely the lesser administrative costs of</p>



Rule Variance or Tariff Revision Requested <sup>i, ii</sup>	Rationale <sup>iii</sup>	Justification <sup>iv</sup>	
	<p>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....</p>	<p>maintenance expenses. Ameren Missouri recommends lowering the reconnection fee to \$10 for AMI customers.</p>	<p>reconnection, which until this can be more exactly determined, is established at \$10. This will not impact the Company's other customers because even the \$30 fee does not fully cover the administrative costs (including truck rolls) of reconnection. Additionally, the reduction of this fee may encourage increased AMI meter adoption among customers, and will lessen the financial hardship for customers who are already struggling to pay their bills.</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.

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.

### C. Beginning and Ending Meter Readings

16. In Table 3 below, Ameren Missouri requests a waiver applicable to residential customers so that it may cease printing beginning meter readings and ending meter readings on bills for those customers. Currently, Ameren Missouri only uses interval metering data to bill some non-residential customers, but the Company wants to expand this to residential with its proposed

TOU rates.<sup>4</sup> As Ameren Missouri began preparing AMI-enabled rate structures for its rate design in File No. ER-2019-0335, such as the Smart Savers TOU rate, it determined an increased need for interval-based billing. Bills for customers who enroll in certain types of TOU rate structures are calculated by adding the hourly interval data into the TOU periods to apply time-varying rates. For example, for the Smart Savers summer rate option, interval data gathered on a weekday between 3 – 7 pm will be billed at a different rate than interval data from other periods during the day. In other words, the rate is applied to energy accumulated during specified hourly periods rather than for a typical, weeks-long billing period. This is described in more detail in the *Report*.

17. Given the interval data AMI relies on, it is neither practical nor helpful to include beginning and ending meter readings for AMI customers using TOU rates. Ameren Missouri's AMI planning and implementation will be aided by the grant of a variance, early in the infrastructure development process, from the requirement to provide beginning and ending meter readings for residential customers with an AMI meter who elect TOU rates. To implement interval data billing for AMI metering, Ameren Missouri requests variances, as required by 20 CSR 4240-2.060(4), from the regulations and Company tariffs listed in Table 3 below.

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<sup>4</sup> 20 CSR 4240-10.040(2) provides more flexibility with commercial and industrial customers:

Except for the provisions of this rule, all bills rendered to customers for metered service furnished will show the reading of the meter at the beginning and end of the period for which the bill is rendered and shall give the dates of readings, the number of units of service supplied and the basis of the charge or reference. Where, by reason of the use of postal or other card form of billing or for other good reasons, this information cannot reasonably be placed on the bills, any utility may present for filing with the commission, in conjunction with its rules, a proposed form of billing....

**Table 3 – Variances and Revisions Regarding Interval Versus Meter Register Data**

Variance Requested <sup>i, ii</sup>	Rationale <sup>iii</sup>	Justification <sup>iv</sup>
<p><b>Beginning and Ending Meter Readings</b></p>	<p><b>20 CSR 4240-13.020(9)</b> – Every bill for residential utility service shall clearly state – (A) The beginning and ending meter readings of the billing period and the dates of those readings...</p>	<p>As described briefly above and in more detail in the <i>Report</i>, granting variances from these requirements so that the Company can execute interval billing will create process efficiencies and cost savings, as well as easier implementation of TOU rates.</p> <p>As described briefly above and in more detail in the <i>Report</i>, interval billing is at least as accurate as meter register billing. Allowing interval billing for AMI or AMI/TOU customers will avoid redundancies and delays, and will mitigate the costs of implementation.</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.

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.

D. Customer Meter Readings

18. For the variances requested in Table 4 below, Ameren Missouri requests a waiver for all residential AMI customers. Specifically, Ameren Missouri requests permission to cease customer meter readings of meter registers in order to calculate bills. As described in the *Report*, interval data is not something a customer can look at a meter and provide back to the utility. Regardless, given the enhanced communications with the Company for bill calculation, and the increased transparency for customers, the need for customer readings (particularly those arising from bill estimations) have historically been very rare. As noted in the *Report*, in the first nine

months of 2019, there were only 17 customer-provided meter readings. Further, for complex rate offerings, customer-supplied meter readings will not be possible.

19. Ameren Missouri requests variances, as required by 20 CSR 4240-2.060(4), from the regulations and Company tariffs listed in Table 4 below in order to eliminate the customer read of AMI meters.

**Table 4 – Variances and Revisions Regarding Customer Meter Readings**

Variance Requested <sup>i, ii</sup>	Rationale <sup>iii</sup>	Justification <sup>iv</sup>	
<p><b>Customer Meter Readings</b></p>	<p>As described briefly above and in more detail in the <i>Report</i>, allowing customer meter readings will be confusing or impossible for customers, and given the communications capabilities of AMI, should be unnecessary.</p>	<p>As described briefly above and in more detail in the <i>Report</i>, given the 2-way communication capabilities of AMI, no customer will be disadvantaged by not being able to directly read a meter and provide that reading for billing. Rather, the customer will have 24-hour access to his or her usage data in a granularity not previously available.</p>	
			<p><b>20 CSR 4240-13.020(2)(A)3</b> - ... If the utility is unable to obtain an actual correct meter reading ..., where necessary, it shall undertake reasonable alternatives to obtain a customer reading of the meter, for example mailing or leaving post-paid, preaddressed postcards upon which the customer may note the reading unless the customer requests otherwise...</p>
			<p><b>20 CSR 4240-13.020(3)</b> - If a utility is unable to obtain an actual meter reading for three (3) consecutive billing periods, the utility shall advise the customer by first class mail or personal delivery that ... the customer may read and report their electric, gas, sewer, or water usage to the utility on a regular basis. A utility shall explain to the customer the procedure by which this reading and reporting may be initiated....</p>
<p><b>20 CSR 4240-13.040(3)</b> - A utility shall prepare, in written form, information in plain language, which summarizes the rights and responsibilities of the utility and its customers in accordance with this chapter.... The written information shall indicate conspicuously that it is being provided in accordance with the rules of the commission, and shall contain</p>			

Variance Requested <sup>i, ii</sup>	Rationale <sup>iii</sup>	Justification <sup>iv</sup>
<p>information concerning, but not limited to - ... (G) Explanation of meter reading procedures which would enable a customer to read his/her own meter...</p> <p><b>REVISION: Sheet No. 130, General Rules and Regulations, V. Billing Practices, D. Customer Readings</b> - The Company will provide all customers the opportunity to read and report monthly energy usage so long as the reports are regular and accurate. The Company will provide pre-addressed, post-paid postcards for this purpose upon request....</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.

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. Additional Tariff Revisions

#### A. Estimation Routines

20. 20 CSR 4240-13.020(2)(C) provides that a utility without an approved estimating procedure in its tariffs will use the procedure outlined in the regulation. Ameren Missouri's procedure can be found at Sheet No. 131.1, and generally relies on prior usage. However, given AMI implementation and the increased functionality of those meters, the procedure outlined in Tariff Sheet No. 131.1 is no longer an appropriate mechanism. With AMI meters, Ameren Missouri will be able to estimate any bills (if estimations are required) with a greater amount of accuracy because of the availability of more granular interval data.<sup>5</sup> Accordingly, Ameren Missouri proposes to add an estimation hierarchy for the type of data used in estimations based on

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<sup>5</sup> In fact, over time the need for estimation should decrease as the quality of data increases.

whether the meter is a typical register meter, AMR interval meters, AMI and AMR meters in place for under a year, or AMI meters in place for at least a year. Each step addresses the appropriate amount of data granularity to increase the accuracy of the estimation. An exemplar tariff is included with this filing.

21. The Company does not believe any variance is required to determine whether the exemplar tariff is appropriate. However, if the Commission disagrees, Ameren Missouri requests a variance of 20 CSR 424-13.020(2)(C) for the reasons listed in Table 5 below.

**Table 5 – Variances and/or Revisions Regarding Estimation Routine**

Variance Requested (if needed) <sup>i, ii</sup>	Rationale <sup>iii</sup>	Justification <sup>iv</sup>
<p><b>Estimation Routines</b></p> <p><b>20 CSR 4240-13.020(C)</b> – When a utility renders a bill based on estimated usage, it shall comply with the following:</p> <p>1. A utility that has an estimating procedure in its filed and commission-approved tariffs shall follow that estimating procedure;</p>	<p>As described briefly above and in more detail in the <i>Report</i>, the proposed tariff will create an estimation routine appropriate for use with AMI meters.</p>	<p>As described briefly above and in more detail in the <i>Report</i>, Ameren Missouri's existing estimation routine does not provide for the nuances of an AMI metering system, or a system with both AMR and AMI metering types. The Company's proposed tariff revision allows for the increasing estimation accuracy provided by AMI meters.</p>
<p><b>REVISION: Sheet No. 131.1, General Rules and Regulations, V. Billing Practices, E. Estimated Billing, 3. General Estimating Procedures</b> – In estimating readings, Company will generally use the identical use during the corresponding month of the prior year. If the customer did not use service at this location at that time, the estimated use is</p>		

Variance Requested (if needed) <sup>i, ii</sup>	Rationale <sup>iii</sup>	Justification <sup>iv</sup>
<p>the identical use during the preceding month of the current year. Exceptions to the general rule will be basically refinements for initial bills, final bills, bills of electric space heating customers during the first year of service, etc.</p> <p>Bills rendered for electric service in months in which meters are not read will be subject to all rules and regulations to bills based on actual meter readings.</p> <p>Where bills are rendered for periods of use in excess of or less than the period provided for under paragraph A, Monthly Billing Periods, all components of the rate will be prorated.</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.  
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.

**B. Customer Opt-Out Provisions**

22. Ameren Missouri is aware that not all of its customers wish to take service through an AMI meter. The Company had a similar experience with implementation of AMR. Some customers prefer to keep meters that register usage without any type of electronic communication. While the Company has opt-out provisions in its current tariff that provide a means for residential customers to opt out of participation in AMR metering, it has already identified clarifications that would help that language and submitted those clarifications to the Commission as part of its electric rate case in File No. ER-2019-0335. Specifically, in File No. ER-2019-0335, the Company proposed a revision to Sheet No. 159 that clarifies certain events (those that make meters inaccessible to Company personnel) that constitute a constructive opt-out from AMR. In preparing for AMI deployment, the Company identified additional clarifications to the opt-out language,

some of which is attributable to further clarifying the language proposed for election versus meter inaccessibility in File No. ER-2019-0335. These additional clarifications will not require a variance from any regulation, but are included in this pleading so that all potential variances and tariff revisions can be addressed in one proceeding.

23. The two additional clarifications proposed in this docket that were not included in File No. ER-2019-0335 relate to the ways that the non-standard meter charges are assessed. First, the Company proposes revisions to Sheet No. 63 that will alter the non-standard metering rate from \$45 per month to \$45 per month for the first meter plus \$10 per month for each additional meter on the same customer account. This reflects the fact while there still may be some administration involved in meter reads, separate trips for reads will not be required for each meter. This variance filing also clarifies on Sheet No. 129 that, in cases of opt-out due to inaccessible meters, the one-time setup charge does not apply since there is no new meter set required and the monthly recurring charge will not accrue until the existing AMR meter becomes non-operational in that geographic area.

24. The Company is presenting these tariff revisions with the requested variances, but will anticipate submitting compliance tariffs to incorporate this language together with the compliance tariffs resulting from the proceeding in File No. ER-2019-0335.

### **CONCLUSION**

25. Ameren Missouri requests timely decisions on these requested variances and tariff revisions so that it can provide an efficient AMI deployment for its customers. The more certainty the Company has at this stage, the better it can incorporate that into its deployment, resulting in:



- Reduced costs by having fewer meter programs to maintain, manage and process through inventory of meters;<sup>6</sup>
- Reduced errors resulting from the implementation of meter programs that need to change shortly after deployment; and
- Materially shorten the time required to make alternative rates available to a customer who have elected to participate in alternative rate structures.

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<sup>6</sup> Without a timely decisions on the requested variances and tariff revisions, Ameren Missouri will face issues such as the necessity of a unique meter program for each unique rate structure offered. While those programs can be "downloaded" to a specific meter through the AMI systems, this is not the primary purpose or strength of the system and accordingly can cause delays in product offerings.

**WHEREFORE**, Ameren Missouri respectfully requests that the Commission grant the requested variances by January 3, 2020, which would allow the Company to more efficiently and effectively deploy its AMI infrastructure, as described above, as well as other relief as the Commission may find appropriate.

Respectfully Submitted,

*/s/ Paula N. Johnson* \_\_\_\_\_

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**ATTORNEYS FOR UNION ELECTRIC  
COMPANY d/b/a AMEREN MISSOURI**

**CERTIFICATE OF SERVICE**

I do hereby certify that a true and correct copy of the foregoing Application has been e-mailed, this 8<sup>th</sup> day of October, 2019, to the Missouri Public Service Commission Staff and to the Office of the Public Counsel.

/s/ Paula N. Johnson

# STATE OF MISSOURI



**John R. Ashcroft**  
**Secretary of State**

CORPORATION DIVISION  
CERTIFICATE OF GOOD STANDING

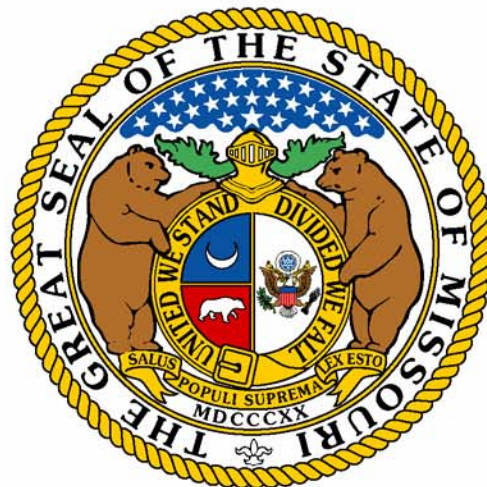
I, JOHN R. ASHCROFT, Secretary of State of the State of Missouri, do hereby certify that the records in my office and in my care and custody reveal that

***UNION ELECTRIC COMPANY***  
***00040441***

was created under the laws of this State on the 21st day of November, 1922, and is in good standing, having fully complied with all requirements of this office.

IN TESTIMONY WHEREOF, I hereunto set my hand and cause to be affixed the GREAT SEAL of the State of Missouri. Done at the City of Jefferson, this 14th day of May, 2019.

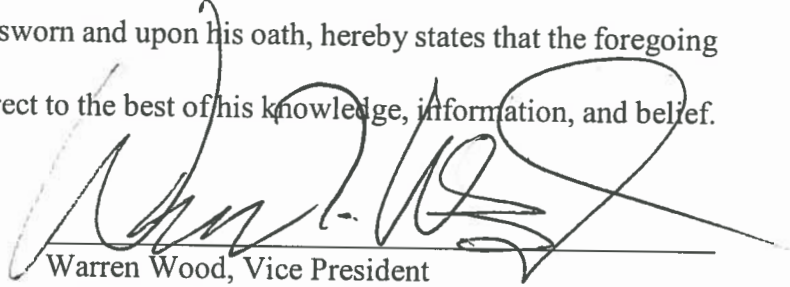
  
Secretary of State



Certification Number: CERT-05142019-0093


**VERIFICATION**

The undersigned, being first duly sworn and upon his oath, hereby states that the foregoing *Application for Variances* is true and correct to the best of his knowledge, information, and belief.



Warren Wood, Vice President  
External Affairs and Communications  
Union Electric Company d/b/a Ameren Missouri

Subscribed and sworn before me this 17<sup>th</sup> day of October, 2019.



Gerri A. Best  
Notary Public

GERI A. BEST  
Notary Public - Notary Seal  
State of Missouri  
Commissioned for St. Louis County  
My Commission Expires: February 15, 2022  
Commission Number: 14839811

**UNION ELECTRIC COMPANY**

**ELECTRIC SERVICE**

MO.P.S.C. SCHEDULE NO. 6 4th Revised SHEET NO. 63

CANCELLING MO.P.S.C. SCHEDULE NO. 6 3rd Revised SHEET NO. 63

APPLYING TO MISSOURI SERVICE AREA

**MISCELLANEOUS CHARGES**

\*Reconnection Charges per Connection Point

Sheet No. 79, Par. B-3 (Annually Recurring Service)	\$30.00
Sheet No. 145, Par. I (Reconnection of Service):	
AMR or Non-Communicating Meter	\$30.00
AMI Meter	\$10.00

Supplementary Service Minimum Monthly Charges

Sheet No. 78, Section C-3	
Charges applicable during 4 monthly billing periods of June through September	<u>Primary Service Rate</u>
Customer Charge per month, plus	\$324.46
Low-Income Pilot Program Charge - per month	\$61.10
All kW @	\$19.88
Charges applicable during 8 monthly billing periods of October through May	
	<u>Primary Service Rate</u>
Customer Charge per month, plus	\$324.46
Low-Income Pilot Program Charge - per month	\$61.10
All kW @	\$9.01

Returned Check Fee \$25.00

\*Opt-Out Charges

Sheet No. 129, Section E	
One-time setup charge	\$150.00
Non-Standard Meter Charge - per month:	
1st Meter on one customer account	\$45.00
Each additional meter on the same customer account	\$10.00

Paperless Billing Incentive (Credit to Customer)

Sheet No. 138, Section N	
Paperless Billing Incentive - per month	\$0.50

Service Call Charge

Customer's reporting service problems may be charged a \$50.00 fee for a service call, if it is determined the problem is within the customer's electrical system.

Tax Adjustment Any license, franchise, gross receipts, occupation or similar charge or tax levied by any taxing authority on the amounts billed hereunder will be so designated and added as a separate item to bills rendered to customers under the jurisdiction of the taxing authority.

\*Indicates Change.

DATE OF ISSUE _____	DATE EFFECTIVE _____
ISSUED BY <u>Michael Moehn</u>	<u>President</u> <u>St. Louis, Missouri</u>
NAME OF OFFICER	TITLE ADDRESS

**GENERAL RULES AND REGULATIONS**

**IV. MEASUREMENT OF SERVICE**

**A. METERING STANDARDS**

Company will furnish and install only one main watthour meter and one main instrument or method of demand measurement (normally measuring kilowatts in periods of fifteen consecutive minutes), to register all energy and power of the same type of service supplied to a given customer at any individual premises unless accuracy of measurement, engineering, safety reasons, economic reasons, rates, or legal provisions require the installation of more than one meter.

For secondary service customers receiving both single and three phase service, one single and one three phase energy and demand meter set will be furnished by the Company where required by applicable tariffs.

**B. ADDITIONAL METERING**

Company, at its option, may install for billing purposes, to the extent Company considers feasible, additional meters in excess of those specified in paragraph A above, for customer's engineering or economic reasons. Customer shall pay Company for such excess meters monthly with the bill for service at the following rates:

- a. Standard single phase secondary A.C. watthour meters @ \$2.25 per meter per month
- b. Standard three phase secondary A.C. watthour meters @ \$6.75 per meter per month
- c. Current transformers (C.T.) where required by size of load @ \$2.50 per C.T. per month
- d. Any special meter or meter equipment, such as primary and switchboard type meters @ 2.00% per month of the cost of such meter or equipment

MO.P.S.C. SCHEDULE NO. 6 3rd Revised SHEET NO. 129CANCELLING MO.P.S.C. SCHEDULE NO. 6 2nd Revised SHEET NO. 129APPLYING TO MISSOURI SERVICE AREA**GENERAL RULES AND REGULATIONS****IV. MEASUREMENT OF SERVICE (Cont'd.)****C. MULTIPLE METERED ACCOUNT BILLING**

Where more than one meter is installed for metering the premises of an individual account in accordance with paragraphs A and B above, the sum of each watthour meter's kilowatt-hour usage and each demand meter's individual maximum non-simultaneous kilowatt demand will be used for billing purposes. Under all circumstances involving multiple metered accounts, any alternating current watthour meter registering zero usage in a given billing month shall be subject to the monthly charge for three phase meters, specified in paragraph B of this Section IV, during each month of zero usage.

**D. METER INSPECTIONS AND TESTING**

Company's meters shall be inspected and tested for accuracy in accordance with applicable Missouri Public Service Commission Rules. If customer requests a meter test within 12 months of any previous testing of such meter, a standard charge based on meter type will be assessed for meters found to have an average meter error of 2 percent or less.

**\*E. REMOTE METER READING OPT-OUT**

Residential Customer Election:

Customers receiving Residential Service have the option of refusing the installation of remotely read metering or requesting the removal of previously installed remotely read metering. In such instances, non-standard metering equipment will be installed that requires a manual meter read. Customers requesting non-standard metering service after April 1, 2017 will be charged a one-time setup charge and a monthly recurring Non-Standard Meter Charge after a non-communicating meter has been installed. Charges are listed on Sheet No. 63, Miscellaneous Charges.

Inaccessible Meters:

In the normal course of business, Company replacement of meters may occur. To the extent that a residential or non-residential customer denies, either through physical impediments, verbal denial or threats of violence, access to property or metering installation, or fails to establish a suitable time for access, customer will be notified, in writing, that failure to provide access will result in customer being considered an opt-out customer not sooner than 30 days after Company's notice. Company's notification will include information for the customer to understand the financial impact of opt-out status. Charges are listed on Sheet No. 63, Miscellaneous Charges. In such cases, the one-time setup charge will not apply and the monthly recurring charge shall only apply after Company's existing AMR meter reading system becomes non-operational for the geographic location of the meter.

\*Indicates Change.

DATE OF ISSUE \_\_\_\_\_ DATE EFFECTIVE \_\_\_\_\_

ISSUED BY Michael Moehn President St. Louis, Missouri  
NAME OF OFFICER TITLE ADDRESS



APPLYING TO MISSOURI SERVICE AREA

GENERAL RULES AND REGULATIONS

V. BILLING PRACTICES

**\*A. MONTHLY BILLING PERIODS**

Each customer billed by the Company for an entire calendar year will be billed for twelve (12) periods of approximately thirty (30) days each. For any given customer, the first five (5) and the last three (3) billing periods of each calendar year will be billed on the Company's applicable winter rate schedule. The sixth (6th) through the ninth (9th) billing periods of each calendar year will be billed on the Company's applicable summer rate schedule. Each customer billed by the Company for an entire calendar year will, thus, receive eight (8) billings based upon the Company's winter rates and four (4) billings based upon the Company's summer rates.

Where bills are rendered for periods of use in excess of or less than the period provided for herein, all base rate components will be prorated.

A customer exercising Section V.O. Residential Due Date Selection may result in either a longer or shorter period between meter readings for the first bill after the election. (This section reflects a variance from Rules 4 CSR 240-13.015(1)(C) and 4 CSR 240-13.020(6) granted by Commission in Case EE-2019-0385.)

**B. COMBINATION BILLING OPTION**

Customers regularly being the responsible party for service at ten or more premises may submit a written request for a single bill with a due date, designated by the Company, for the bills for all such premises. Such single bill will have an attached statement of charges for each account.

**C. INACCESSIBLE METERS**

Where a meter is inaccessible to the meter reader during scheduled working hours on repeated occasions, such that a customer must arrange for meter reading by appointment to avoid discontinuance of service, the customer may at customer's expense have the meter relocated to an accessible location, if feasible.

**\*D. METER READINGS**

The Company will secure, per billing period, a minimum of one register meter reading for meters billed through the register reading or sufficient interval readings to determine total use for meters billed through interval data, except when it is necessary and allowed to estimate a bill as described in General Rules and Regulations, V. Billing Practices pursuant to the variances from Rules 20 CSR 4240-13.020(2)(A)3 and 20 CSR 4240-13.020(3) and 20 CSR 4240-13.040(3) granted by Commission in File No. EE-2019-0382.

\*Indicates Change.

DATE OF ISSUE \_\_\_\_\_ DATE EFFECTIVE \_\_\_\_\_

ISSUED BY Michael Moehn President St. Louis, Missouri  
NAME OF OFFICER TITLE ADDRESS

MO.P.S.C. SCHEDULE NO. 6 2nd Revised SHEET NO. 131CANCELLING MO.P.S.C. SCHEDULE NO. 6 1st Revised SHEET NO. 131APPLYING TO MISSOURI SERVICE AREA**GENERAL RULES AND REGULATIONS****V. BILLING PRACTICES (Cont'd.)****\*D. METER READINGS (Cont'd.)**

The company will retain for a minimum of five years the meter information relied upon to generate bills for such customers.

Residential Time-Variant Rate Schedule Procedures: For residential rate schedules which require cumulative usage be determined for unique time periods during a billing period and usage is determined through interval metering data, beginning and ending meter readings for that billing period may not be utilized in lieu of the interval metering data. In such cases, a customer's bill will reflect the total consumption for each relevant time period but will not indicate a beginning or ending metering reading for the cumulative billing period pursuant to the variance from Rule 20 CSR 4240-13.020(9) (A) granted by Commission in File No. EE-2019-0382.

**E. ESTIMATED BILLING****\*1. Estimated Bill**

An estimated reading will be used to compute an estimated bill for customer's electric service where it is not feasible to obtain regular meter readings or when conditions beyond the control of the Company, such as weather emergencies, work stoppages, and inability to gain access to the meter prevent obtaining an actual meter reading or when an inaccurate reading results from equipment or mechanical failure where the Company could not reasonably detect such failure. An estimated reading may also be used to compute an estimated bill when an inaccurate or unreliable reading results from human or billing system error, from failure of a remote meter reading device to transmit a reliable reading, or as a result of a failure to detect and verify usage due to a meter with a status of vacant; except Company may not issue an estimated bill due to any of these three (3) stated conditions for more than three (3) consecutive months.

Company shall maintain accurate records of the reasons for an estimated bill and all efforts made to secure an actual reading and clearly note on the bill that it is based on estimated usage.

**2. Estimated Initial and Final Bills**

Meter readings for initial and final bills may be estimated if the customer's notification is received too late to obtain an actual meter reading on the date that the customer desires to have service commenced or terminated (the "customer's responsible date"). If a meter reading is obtained within three days of the customer's responsible date, no other reading shall be deemed necessary. If customer notification is received up to two workdays after the customer's responsible date, an

\*Indicates Change.

DATE OF ISSUE \_\_\_\_\_ DATE EFFECTIVE \_\_\_\_\_

ISSUED BY Michael Moehn President St. Louis, Missouri  
NAME OF OFFICER TITLE ADDRESS

MO.P.S.C. SCHEDULE NO. 6 1st Revised SHEET NO. 131.1CANCELLING MO.P.S.C. SCHEDULE NO. 6 Original SHEET NO. 131.1APPLYING TO MISSOURI SERVICE AREAGENERAL RULES AND REGULATIONSV. BILLING PRACTICES (Cont'd.)E. ESTIMATED BILLING (Cont'd.)\*2. Estimated Initial and Final Bills (Cont'd.)

attempt to obtain an actual meter reading will be made within the next two workdays. Readings obtained in either manner will be adjusted to the customer's responsible date. No final bill will be rendered where the amount of the bill for electric usage is less than \$1.00, except for those accounts where a customer deposit is being refunded to customer.

\*\*3. Estimating Procedures

Bills rendered for electric service in billing periods in which meters are not read will be subject to all rules and regulations applicable to bills based on actual meter readings.

In estimating readings, Company will generally use the methods detailed in this section except where such methods fail or produce flawed estimates or where refinements are necessary for initial bills, final bills, etc.

In estimating meter readings:

- a. For all meters that do not have communication capability (manual meters), all AMR register meters and any AMI meters that have been in service for less than twelve (12) billing periods, the Company will generally use the average daily use during the corresponding billing period of the prior year. If the customer did not use service at this location at that time, the estimated usage is based upon the average daily use during the immediately preceding billing period of the current year. If neither prior year or prior month usage is available then either a similar customer's usage or another method will be used.
- b. For all AMR interval meters, an estimate will be performed manually in order to consider any unique customer specific circumstances.
- c. For AMI meters which are billed using the register reading and which have been in service for twelve (12) or more billing periods and for which a valid register reading occurred sometime during the billing period, that register reading will be used and only a portion of the billing period will be estimated to arrive at a final estimated reading. The portion of the billing period for which a register reading must be estimated will be based upon the following rules with the first successful rule applying:

\*Indicates Reissue. \*\*Indicates Change

DATE OF ISSUE \_\_\_\_\_ DATE EFFECTIVE \_\_\_\_\_

ISSUED BY Michael Moehn President St. Louis, Missouri  
NAME OF OFFICER TITLE ADDRESS

APPLYING TO \_\_\_\_\_

MISSOURI SERVICE AREAGENERAL RULES AND REGULATIONSV. BILLING PRACTICES (Cont'd.)E. ESTIMATED BILLING (Cont'd.)3. Estimating Procedures

## c. (Cont'd.)

Bills rendered Using the same customer and location, use the calculated average daily usage:

- 1) From the prior year's same billing period.
- 2) From the prior month's billing period.
- 3) From the current billing period.
- 4) for the last two year's billing month period.

Using the same customer and location, use the last good read for the same day type where day type is weekday or weekend:

- 5) Use the week-old good read
- 6) Use the two-week-old good read
- 7) Use the three-week-old good read
- 8) Use the four-week-old good read
- 9) Use the eight-day-old good read

Using the same location, use the calculated average daily usage:

- 10) From the prior year's same billing period.
- 11) From the prior month's billing period.
- 12) From the current billing period.
- 13) For the last two year's billing month period.

Using a similar customer, use the calculated average daily usage:

- 14) From the prior year's same billing period.
- 15) From the prior month's billing period.

- d. For AMI meters which are billed using the interval readings and which have been in service for twelve (12) or more billing periods, any missing interval data will be estimated based upon the following rules with the first successful rule applying:

- 1) Using same day's historical data.
- 2) Using like day's historical data.
- 3) Using flat line estimation

\*F. TRANSFER OF BALANCES

In the event of disconnection or termination of service at a separate customer metering point, premise or location, Company may transfer any unpaid balance to any other service account of the customer having a comparable class of service.

\*Indicates Reissue.

DATE OF ISSUE \_\_\_\_\_

DATE EFFECTIVE \_\_\_\_\_

ISSUED BY Michael Moehn  
NAME OF OFFICERPresident  
TITLESt. Louis, Missouri  
ADDRESS

APPLYING TO MISSOURI SERVICE AREA

**G. BILLING ADJUSTMENTS**

1. Residential

For all residential billing errors, the Company will determine from all related and available information the probable period during which the error condition existed and shall make billing adjustments for the estimated period involved as follows:

- a. In the event of an overcharge, an adjustment shall be made for the entire period that the overcharge can be shown to have existed not to exceed sixty (60) consecutive monthly billing periods calculated from the date of discovery, inquiry or actual notification of the Company whichever comes first;
- \*b. In the event of an undercharge, an adjustment shall be made for the entire period that the undercharge can be shown to have existed not to exceed twelve (12) monthly billing periods calculated from the date of discovery, inquiry or actual notification of the Company, whichever was first and the Company will offer a repayment period of double the period covered by the adjusted bill though the customer may elect a shorter repayment period;
- c. Where, upon test, an error in measurement is found to be within the limits prescribed by Commission rules, no billing adjustment will be made;
- d. When evidence of obstruction is found, or there are misrepresentations of the use of service by the customer, the Company will calculate the billing adjustment period in accordance with the applicable statute of limitations for the prosecution of such claim after determining the probable period during which such condition existed from all related and available information; and
- e. In any event, no billing adjustment will be made where the full amount of the adjustment is less than one dollar (\$1) and no interest shall be paid or collected on any billing adjustment provided for herein.

\*Indicates Change

DATE OF ISSUE June 27, 2014

DATE EFFECTIVE July 27, 2014

ISSUED BY Michael Moehn  
NAME OF OFFICER

President & CEO  
TITLE

St. Louis, Missouri  
ADDRESS

APPLYING TO \_\_\_\_\_

MISSOURI SERVICE AREAGENERAL RULES AND REGULATIONSV. BILLING PRACTICES (Cont'd.)G. BILLING ADJUSTMENTS (Cont'd.)1. Residential (Cont'd.)

- f. No corrections to metering data for meter error shall extend beyond the in-service date of the meter discovered to be in error, nor shall any correction be required to extend beyond the date upon which the current customer first occupied the premises at which the error is discovered.

2. Non-Residential

For all non-residential billing errors, the Company will determine from all related and available information the probable period during which the error condition existed and shall make billing adjustments for the estimated period involved as follows:

- a. No billing adjustment will be made where the dollar amount of the adjustment is less than \$15.00. No interest shall be paid or collected on any billing adjustment provided for herein.
- b. Where upon test an average meter error is found to be greater than 2 percent a billing adjustment will be made to compensate customer where the meter reads fast, and to compensate Company where the meter reads slow. However, any such billing adjustment will be applicable only for the probable period during which the meter error existed and shall be limited to the twenty-four (24) billing periods preceding the one in which the error was determined plus the elapsed period in the current billing period during which the test was made.
- c. Where a non-registering meter is found, Company will determine from all related and available facts the probable period during which such inaccuracy existed and render adjusted bills for the period involved, provided, however, that such period shall not exceed the preceding six (6) billing periods plus the elapsed time in the current billing period during which each inaccuracy was determined.
- d. Bills rendered which are based on incorrect registrations due to improper meter connections, the application of an improper meter constant, improper application of any rate schedule not selected by customer, or similar reasons, shall be subject to adjustment for the current and twenty-four (24) prior billing periods, as can be substantiated by Company records.
- e. "Average meter error" shall be determined in accordance with provisions set forth in rules of the Missouri Public Service Commission.

DATE OF ISSUE May 31, 2013DATE EFFECTIVE June 30, 2013ISSUED BY Warner L. Baxter  
NAME OF OFFICERPresident & CEO  
TITLESt. Louis, Missouri  
ADDRESS

APPLYING TO \_\_\_\_\_

MISSOURI SERVICE AREAGENERAL RULES AND REGULATIONSV. BILLING PRACTICES (Cont'd.)G. BILLING ADJUSTMENTS (Cont'd.)2. Non-Residential (Cont'd.)

- f. No corrections to metering data for meter error shall extend beyond the in-service date of the meter discovered to be in error, nor shall any correction be required to extend beyond the date upon which the current customer first occupied the premises at which the error is discovered.

H. CHANGE OF RATE

1. The rate selected by customer and specified by contract for service (if a written contract is required) shall be applied to customer's account for a period of not less than one year unless customer elects to transfer to a different rate during the first ninety (90) days of service. If so elected, the new rate shall be applied retroactively to the commencement date of customer's service.
2. Upon completion of the initial term of use of service under any rate, customer may select any other applicable rate and the rate so selected shall apply for a period of not less than that specified in the term of use of such selected rate.
3. Selection of rate shall be the obligation of the customer. A new rate when selected under and subject to the provisions set forth above will be placed in effect in the billing period following receipt of customer's request therefore.
4. Where a customer's load is abnormally affected during temporary periods of construction, alteration, preliminary or experimental operations, fire, or acts of God, Company may, upon prior agreement with customer, adjust or modify its billing or other charges otherwise applicable during the current or succeeding months in consideration of the particular circumstances in each such case.
5. Where abnormal and significant reductions in customer's operations occur due to events such as production curtailments, plant alteration, labor stoppages, fires or other acts of God, etc. which reduce customer's monthly billing demand below 100 kilowatts, customer may transfer to the Small General Service Rate for all billing periods subsequent to the initial billing period under such abnormal operation, following Company's receipt of written request for such change from customer. During such billing periods under the Small General Service Rate, any billing discounts under Riders B and C shall not apply.
6. Customers will not be permitted to evade the intent of the provisions of this paragraph H by temporarily terminating service.

DATE OF ISSUE May 31, 2013DATE EFFECTIVE June 30, 2013ISSUED BY Warner L. Baxter  
NAME OF OFFICERPresident & CEO  
TITLESt. Louis, Missouri  
ADDRESS

APPLYING TO MISSOURI SERVICE AREA

**GENERAL RULES AND REGULATIONS**

**V. BILLING PRACTICES (Cont'd.)**

**I. \*BUDGET BILLING PLAN**

Customers who are billed under Service Classification No. 1(M) or No. 2(M) with postcard or electronic billing and, at Company's option, certain eleemosynary customers may elect to be billed and pay for all electric service under Company's Budget Billing Plan provided customer shall have satisfied Company's credit requirements. The provisions of the Budget Billing Plan are as follows:

1. Upon enrollment in the Budget Billing Plan by customer, the average monthly bill amount will initially be equal to one-twelfth of the estimated annual billing to the customer with a one hundred dollar (\$100) minimum average monthly bill applicable to customers with less than twelve (12) months of billing history for the current account.
2. Company will re-evaluate the estimated annual billing to an actual use basis on the sixth month following the customer's enrollment in the program or anniversary date for existing Budget Bill customers. Thereafter, during the May and November bill cycles, the Company will re-evaluate the estimated annual bill and adjust the Budget Billing Plan amount where such adjustment will result in a change of at least three (\$3.00) per month.
3. Budget Bill settlement will occur annually during either the Company's May or November bill cycles with the initial settlement occurring more than six (6) but less than twelve (12) months after the customer's enrollment in the program or the anniversary date for existing Budget Bill customers. Any under or over collection balance existing at the settlement month will be rolled over and spread equally across all monthly bills in the next Budget Billing Plan year, unless customer requests the balance to be fully included on the settlement month's bill.
4. Customers that were enrolled in the Budget Billing Plan prior to the effective date of this tariff will be converted to the new program on their next anniversary date.
5. Company may terminate this Budget Billing Plan to any customer who shall fail to make payment hereunder by the delinquent date, and, upon such termination and thereafter, such customer shall be billed in accordance with the terms of Company's standard monthly billing practice. Any billing adjustments required at the date of such termination shall be included in the next bill rendered to customer.
6. Customer may, at any time, elect to terminate the application of this Budget Billing Plan by requesting such termination and thereafter paying when due any amounts, including billing adjustments, which may be necessary in order to settle the account hereunder.
7. Final bills, whenever rendered, will include such amounts as may be necessary to settle the account based on actual usage as of the date of final meter reading unless, beginning with the August 2015 billing cycle, the balance is transferred to customer's new account.

\* Indicates Change

DATE OF ISSUE April 15, 2015 DATE EFFECTIVE November 20, 2015

ISSUED BY Michael Moehn President St. Louis, Missouri  
NAME OF OFFICER TITLE ADDRESS



MO.P.S.C. SCHEDULE NO. 6 1st Revised SHEET NO. 136CANCELLING MO.P.S.C. SCHEDULE NO. 6 Original SHEET NO. 136APPLYING TO MISSOURI SERVICE AREAGENERAL RULES AND REGULATIONSV. BILLING PRACTICES (Cont'd.)**\*J. LATE PAYMENT CHARGE**

Any portion of any bill, other than deposit arrears, remaining unpaid after the delinquent date indicated thereon will have a late payment charge of 1.5 percent of the gross unpaid amount added and shown on the next bill. Any portion of such "arrears" remaining unpaid after the delinquent date on any subsequent bill will also have a late payment charge of 1.5 percent added thereto. When a customer's payment is received by mail not more than two business days after the delinquent date it shall be deemed a timely payment. If the bill does not show a designated "delinquent date," for purposes of this paragraph the "due date" shall be deemed to be the delinquent date. The specific late payment charge and delinquent dates referred to above will be subject to variation for State of Missouri and U.S. Government accounts, where required by law or other regulation. Failure to pay any late payment charge shall be grounds for disconnection of service in accordance with these rules and regulations.

The late payment charge will not be applied to amounts being collected through any and all deferred payment arrangements and settlement agreements between a residential customer and the Company where the residential customer continues to meet its obligations under the deferred payment agreement. Any missed payment pursuant to these arrangements and agreements will be subject to the late payment charge only on the amount of the missed payment.

**\*K. RENT INCLUSION**

The furnishing of electric service by a customer to a third party as an unidentifiable rental component, without such service being segregated and billed to the third party by Company, is generally prohibited by the Commission's rules. Separate metering shall be required for each unit in multiple occupancy buildings constructed after June 1, 1981, except for the following electrical usage:

1. For transient multiple occupancy buildings and transient mobile home parks, e.g., hotel, motels, dormitories, rooming houses, hospitals, nursing homes, fraternities, sororities, campgrounds, and mobile home parks which set aside, on a permanent basis, at least eighty percent (80%) of their mobile home pads or comparable space for use by travel trailers;
2. Where commercial unit space is subject to alteration with change in tenants as evidenced by temporary versus permanent type of wall construction separating the commercial unit space, e.g., space at a trade fair.
3. For commercial adjacent buildings;

\*Indicates Reissue.

DATE OF ISSUE March 13, 2018 DATE EFFECTIVE April 12, 2018ISSUED BY Michael Moehn President St. Louis, Missouri  
NAME OF OFFICER TITLE ADDRESS

MO.P.S.C. SCHEDULE NO. 6 1st Revised SHEET NO. 137CANCELLING MO.P.S.C. SCHEDULE NO. 6 Original SHEET NO. 137APPLYING TO MISSOURI SERVICE AREA**GENERAL RULES AND REGULATIONS****V. BILLING PRACTICES (Cont'd.)****\*K. RENT INCLUSION (Cont'd.)**

4. For that portion of electricity used in central space heating, central hot water heating, central ventilating, and central air conditioning systems, or
5. For buildings or mobile home parks where alternative renewable energy resources are utilized in connection with central space heating, central hot water heating, central ventilating, and central air conditioning systems.
6. For all portions of electricity in commercial units in buildings with central space heating, ventilating and air conditioning systems.

Any person or entity affected by the provisions of this Section V.L. Rent Inclusion may file an application with the Commission seeking a variance from all or parts of such provisions for good cause shown, pursuant to the Commission's rules applicable thereto.

Nursing homes, as referenced in (1.) above, shall include all facilities licensed by the State of Missouri Department of Social Services Division of Aging. Central space heating, water heating and air conditioning systems referred to in (4.) above shall include those systems employing individual heating/cooling units interconnected with centralized heating/cooling sources by means of a central piping system containing water or other fluids suitable for such purposes.

**\*L. RESALE OF SERVICE**

The furnishing of metered electric service by a customer of Company to a third party for a specific identifiable charge based upon such metered consumption is prohibited except where such practice originated prior to July 24, 1958. Where such practice has continued since July 24, 1958, the charge for electric service from customer to a third party shall not exceed the charge which would result from the application of Company's appropriate rate, contained herein, for comparable electric service.

For such exceptions, the practice of resale shall be discontinued when such premises are remodeled, rebuilt or replaced.

The provision of electric vehicle charging service is not prohibited by this tariff.

\*Indicates Reissue.

DATE OF ISSUE March 13, 2018 DATE EFFECTIVE April 12, 2018ISSUED BY Michael Moehn President St. Louis, Missouri  
NAME OF OFFICER TITLE ADDRESS

MO.P.S.C. SCHEDULE NO. 6 2nd Revised SHEET NO. 138

CANCELLING MO.P.S.C. SCHEDULE NO. 6 1st Revised SHEET NO. 138

APPLYING TO MISSOURI SERVICE AREA

GENERAL RULES AND REGULATIONS

V. BILLING PRACTICES (Cont'd.)

**\*M. PARTIAL PAYMENTS**

If a partial payment is made on a billing including only current charges, the Company shall first credit the payment to the balance outstanding for utility charges before crediting a deposit. If a partial payment is made on a billing which includes a previous balance, the Company will credit the payment first to previous utility charges, then to previous deposit requirements before applying any payment to current charges. No portion of any payment will be applied to special charges until all utility charges are paid in full and all required deposits have been made. (This section reflects a variance from Rule 4 CSR 240-13.020(11) granted by the Commission in Case No. EO-98-263.)

NOTE (not part of filed tariff): This sheet was filed in Rate Case ER-2019-0335 to include new section N. for paperless billing. Rate case changes will need to be inserted on this page when rate case is complete.

\*Indicates Reissue.

DATE OF ISSUE March 13, 2018 DATE EFFECTIVE April 12, 2018

ISSUED BY Michael Moehn President St. Louis, Missouri  
NAME OF OFFICER TITLE ADDRESS

MO.P.S.C. SCHEDULE NO. 6 Original SHEET NO. 138.1

CANCELLING MO.P.S.C. SCHEDULE NO. \_\_\_\_\_ SHEET NO. \_\_\_\_\_

APPLYING TO MISSOURI SERVICE AREA

GENERAL RULES AND REGULATIONS

V. BILLING PRACTICES (Cont'd.)

O. RESIDENTIAL DUE DATE SELECTION

Customers receiving service under the Service Classification 1M - Residential Service Rate may select the date their bill will become due provided they are not in active collections, subject to an active deferred payment agreement, and their service is equipped with an advanced meter reading device. If the customer's preferred date is not available, they will be given the option of selecting a different due date or retaining their existing due date.

Customer's selected due date will become effective no later than the second bill issued after customer's selection and cannot be implemented for bills already issued.

The first bill issued following implementation of a due date selected by customer may result in a bill period that is either longer or shorter than normal and may also be prorated.

Customer may not make a due date selection more frequently than once every 12 months except by Company approval. (This section reflects a variance from Rules 4 CSR 240-13.015(1)(C) and 4 CSR 240-13.020(6) granted by Commission in Case EE-2019-0385.)

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ISSUED BY Michael Moehn President St. Louis, Missouri  
NAME OF OFFICER TITLE ADDRESS

MO.P.S.C. SCHEDULE NO. 6 1st Revised SHEET NO. 142CANCELLING MO.P.S.C. SCHEDULE NO. 6 Original SHEET NO. 142APPLYING TO MISSOURI SERVICE AREAGENERAL RULES AND REGULATIONSVII. DISCONNECTION AND RECONNECTION OF SERVICE**\*A. REASONS FOR DENIAL OR DISCONNECTION OF SERVICE**

In addition to any other right reserved by Company in its schedules, rules and regulations, Company reserves and shall have the right to deny service, or after written notice, to disconnect service supplied by it to an electric customer for any of the following reasons:

1. Nonpayment of an undisputed delinquent account;
2. For failure by non-residential customer to pay when due bills for service supplied to such customer within twelve months immediately preceding the date of such notice of customer's current location or at any other location of customer at which similar service is now or has been supplied;
3. Failure to make and maintain a deposit or acceptable guarantee in accordance with the rules and regulations of Company and of regulatory authorities having jurisdiction;
4. Failure to comply with the terms and conditions of a settlement agreement with the Company regarding a dispute or payment of service charges;
5. Refusal after reasonable notice to permit inspection, maintenance, replacement or meter reading of Company equipment. If the Company has a reasonable belief that health or safety is at risk, notice at the time inspection is attempted is reasonable.
6. Misrepresentation of identity for the purpose of obtaining service;
7. Whenever customer disposes of any electric service to another party in any manner other than as expressly authorized by these rules and regulations;
8. Violation of any rules and regulations of the Company on file with and approved by any regulatory authority having jurisdiction or of any such regulatory authority which adversely affects the safety of the customer or other persons or the integrity of the Company's delivery system.
9. As provided by state or federal law.
10. Unauthorized use, interference or diversion of service

Company will inform the prospective customer of the refusal of service in writing and maintain a record of the notice.

**B. NOTICE OF INTENT TO DISCONNECT RESIDENTIAL SERVICE**

\*Notice of intent to disconnect service will state the name and address of the customer (and the service address if it is different), the reason for which service will be disconnected, the cost for reconnection if any, the date on or after which such disconnection may be effected, how a customer may avoid being disconnected, the possibility of a payment agreement and a telephone number the customer may call.

\*Indicates Change

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ISSUED BY	<u>Michael Moehn</u>	<u>President &amp; CEO</u>	<u>St. Louis, Missouri</u>
	NAME OF OFFICER	TITLE	ADDRESS

APPLYING TO

MISSOURI SERVICE AREA

**GENERAL RULES AND REGULATIONS**

**VII. DISCONNECTION AND RECONNECTION OF SERVICE (Cont'd.)**

**B. NOTICE OF INTENT TO DISCONNECT RESIDENTIAL SERVICE (Cont'd.)**

1. Individual Residential Customer Premises

Said notice will be sent to the customer by first class mail not less than ten (10) days prior to the date of the proposed disconnection or delivered to customer not less than 96 hours prior to such date.

2. Single Metered Multi-Dwelling Unit Residential Buildings

At least ten (10) days prior to disconnection of service for nonpayment of a bill or deposit at a multi-dwelling unit residential building at which usage is measured by a single meter, notices of the Company's intent to disconnect will be conspicuously posted in public areas of the building. Such notices will not be required, however, if the Company is not aware that said structure is a single metered multi-dwelling unit residential building or in individual situations where the safety of the Company's employees or agents may be a consideration. If the electric service is necessary to the proper function and operation of a customer's heating equipment, said notice will inform the occupants of their right, under state law, to initiate a receivership procedure.

3. Individually Metered Multi-Dwelling Unit Residential Buildings

At least ten (10) days prior to disconnection of service for nonpayment of a bill or deposit at (a) a multi-dwelling unit residential building where each unit is individually metered, but a single customer is responsible for payment for service in all units in the building, or at (b) a residence in which the occupant using the Company's service is not the Company's customer, the occupant(s) shall be given written notice of the Company's intent to disconnect service, provided however, that such notice will not be required unless one (1) occupant has advised the Company, or the Company is otherwise aware, that he is not the customer. The notice will outline the procedure by which the occupant may apply in his or her name for service of the same character received through that meter. If the electric service for (a) is heat related, said notice will inform the occupants of their right, under state law, to initiate a receivership procedure.

**\*C. RESIDENTIAL CUSTOMER CONTACT AND NOTICE OF DISCONNECTION**

At least 24 hours preceding disconnection of service, the Company will make reasonable efforts to contact a residential customer to advise of the pending action and what steps must be taken to avoid disconnection. Additionally, on the same day that disconnection will occur, Ameren Missouri will perform an additional notification via telephone, text, or email according to customer's preference as indicated on the customer's account to provide notice that disconnection will occur. If no preference has been selected by customer, the

\*Indicates Change.

DATE OF ISSUE \_\_\_\_\_

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ISSUED BY Michael Moehn  
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President  
TITLE

St. Louis, Missouri  
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MO.P.S.C. SCHEDULE NO. 6 2nd Revised SHEET NO. 144CANCELLING MO.P.S.C. SCHEDULE NO. 6 1st Revised SHEET NO. 144APPLYING TO MISSOURI SERVICE AREA**GENERAL RULES AND REGULATIONS****VII. DISCONNECTION AND RECONNECTION OF SERVICE (Cont'd.)****\*C. RESIDENTIAL CUSTOMER CONTACT AND NOTICE OF DISCONNECTION (Cont'd.)**

default method of contact will be via telephone. (This section reflects a variance from Rule 20 CSR 4240-13.050(9) granted by Commission in File No. EE-2019-0382.)

**D. NOTICE OF INTENT TO DISCONNECT NON-RESIDENTIAL SERVICE**

Notice of intent to disconnect service for a non-residential customer under this rule shall state the reason for which service will be disconnected and shall specify a date after which such disconnection may be effected, and such notice shall be mailed to or served upon customer not less than 48 hours prior to such date.

**E. DISCONNECTION HOURS**

Company will disconnect electric service between the hours of 8:00 a.m. and 4:00 p.m. on the date specified on the notice of disconnection or within thirty (30) calendar days thereafter.

**F. DELAY OF DISCONNECTION FOR MEDICAL REASONS**

The Company will postpone the disconnection of service to a residential customer for a time not in excess of 21 days if the Company is advised the disconnection will aggravate an existent medical emergency of the customer, a member of his family or other permanent resident of the premises. The Company may require a customer to provide satisfactory evidence that a medical emergency exists before postponing the disconnection of service.

**G. AVOIDANCE OF DISCONNECTION OF SERVICE**

Disconnection of electric service will not be performed if, on or before the date specified in the notice of intent to disconnect, the customer shall:

1. (a) Make good the default by paying such bills for service at a Company office, or make arrangements satisfactory to Company, therefor, (b) make or restore such deposit at a Company office, (c) give Company representatives such access, or (d) cure such violation of rules and regulations, as the case may be; and
2. Pay at a Company office the expenses incurred by Company in detecting and confirming obstruction of electric service. Such expenses will include, but not be limited to all unmetered service as estimated by Company, special equipment necessary to detect the violation (such as check meter), equipment necessary to prevent future violations, labor and materials necessary to test, change, move or install new meters or other equipment and the cost of any rebilling, as applicable.

\*Indicates Change.

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NAME OF OFFICER TITLE ADDRESS

MO.P.S.C. SCHEDULE NO. 6 1st Revised SHEET NO. 145CANCELLING MO.P.S.C. SCHEDULE NO. 6 Original SHEET NO. 145APPLYING TO MISSOURI SERVICE AREAGENERAL RULES AND REGULATIONSVII. DISCONNECTION AND RECONNECTION OF SERVICE (Cont'd.)**\*H. DISCONNECTION OR INTERRUPTION OF SERVICE WITHOUT PRIOR NOTICE**

Company shall have the right to disconnect or interrupt service without prior notice for reasons of obstruction; maintenance, health, safety or state of emergency, or in cases where Company is directed to interrupt service by a governmental agency or officer. In such cases Company will make a reasonable effort to inform customer of the reasons for disconnection or interruption of service.

**I. RECONNECTION OF SERVICE**

In the event Company disconnects service, in addition to customer's continuing liability for all indebtedness then owed by customer to Company for service supplied at customer's current location and for similar service supplied at any other location of customer, customer shall also be liable for and shall also pay Company for the expenses incurred by Company in detecting and confirming the violation which occasioned such disconnection of electric 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.
2. Any deposit which may be required by Company under its applicable rules and regulations; and,
3. The cost of facilities or changes Company deems necessary or appropriate in order to prevent, insofar as possible, any future violation by customer of the rules and regulations of the Company as well as the cost of rebilling, as applicable.

\*Indicates Reissue

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