

Exhibit No:
Issue(s):
Witness: Andrew D. Teague
**Sponsoring Party: Midwest Energy Consumers
Group**
Type of Exhibit:
File No.: ER-2021-0240
Date Testimony Prepared: November 5, 2021

MISSOURI PUBLIC SERVICE COMMISSION

FILE NO. ER-2021-0240

SURREBUTTAL TESTIMONY OF

ANDREW D. TEAGUE

ON BEHALF OF

MIDWEST ENERGY CONSUMERS GROUP

NOVEMBER 5, 2021

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1 **I. Introduction**

2 **Q. PLEASE STATE YOUR NAME, BUSINESS ADDRESS, AND OCCUPATION.**

3 A. My name is Andrew D. Teague. My business address is 2608 SE J Street, Bentonville,
4 AR 72716. I am employed by Walmart Inc. as Senior Manager, Energy Services.

5 **Q. ARE YOU THE SAME ANDREW D. TEAGUE THAT SUBMITTED DIRECT TESTIMONY IN**
6 **THIS CASE ON BEHALF OF MIDWEST ENERGY CONSUMERS GROUP?**

7 A. Yes, I am.

8 **Q. TO WHAT TESTIMONY ARE YOU RESPONDING?**

9 A. I am responding to the rebuttal testimony from Steven Wills on behalf of Union
10 Electric Company D/B/A Ameren Missouri (“Ameren” or “the Company”).

11 **Q. PLEASE SUMMARIZE MECG’S RECOMMENDATIONS TO THE COMMISSION FROM**
12 **YOUR DIRECT TESTIMONY.**

13 A. MECG’s recommendations to the Commission from my Direct Testimony are:

14 1) The Commission should require the Company to provide customers the
15 ability to retrieve and download energy usage interval data for multiple
16 accounts, up to and including all accounts, through one file; and

17 2) The Commission should require the Company to take the steps necessary to
18 become Green Button Connect My Data (“CMD”) compatible.

19 **Q. DOES MECG PROPOSE ANY ADDITIONAL RECOMMENDATIONS THROUGH YOUR**
20 **SURREBUTTAL TESTIMONY?**

21 A. Yes. MECG additionally recommends that the Commission establish a stakeholder
22 process for engaged customers and other interested stakeholders, and, if the

1 Commission determine it appropriate, all regulated utilities in the state, to discuss
2 data access needs with the Company, in order to ensure that the Company's efforts
3 will result in customer needs being fully met.

4

5 **II. Rebuttal to The Company**

6 **Q. WHAT IS YOUR UNDERSTANDING OF THE REBUTTAL TESTIMONY OF MR. WILLS IN**
7 **REGARDS TO INTERVAL DATA ACCESS?**

8 A. My understanding is that Mr. Wills expresses concern with potential implementation
9 issues that could be encountered in the development of the ability for a customer to
10 download data from all of its accounts, including the verification of authorized users
11 and relevant accounts for a particular customer. Additionally, as it pertains to Green
12 Button Connect My Data, Mr. Wills further cites the belief that the functionality
13 contained in the Company's road map is sufficient to meet customers' needs. See
14 Rebuttal Testimony of Steven Wills, page 57, line 18 to page 58, line 15.

15 **Q. WHAT IS YOUR RESPONSE TO MR. WILLS'S REBUTTAL?**

16 A. In my experience, it is common for large customers with multiple accounts to have
17 those accounts associated with the same login information and accessible through
18 the same customer portal, I believe it is reasonable to expect, at a minimum, this
19 same ease of access to the Ameren portal for commercial and industrial customers.
20 Why this would require a separate authentication process to be able to download
21 data for these accounts that a user can already see is not immediately evident from
22 the Company's rebuttal.

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Q. IS INTERVAL DATA AVAILABLE FROM OTHER UTILITIES IN THE FORMAT REQUESTED BY MECG?

A. Yes. For example, interval data for multiple sites is available in a single download file from municipal utilities such as Orlando Utilities Commission to much larger utilities like Eversource. Duke, in fact, with operating entities in multiple states, even allows a single download file for separate accounts for multiple operating entities. I do not believe this kind of ability is not outside the capacity of Ameren more broadly. For instance, Ameren already allows a retail electric supplier to register and receive downloads for multiple accounts that are subsequently transferred to a third party based on a verification process that consists of entry of a user account, checking a box stating they have permission from the account holder, and the requestor-entered account number(s). It is understood that certain companies may have more complex structures and affiliations where users may have access to only certain segments of the operations (i.e., a franchisee only being able to access usage data for certain accounts), but a user should still be able to download data for all of their accessible accounts through a single action, even if that is only for a single segment of a greater corporation.

Q. DO YOU HAVE ANY COMMENTS REGARDING CMD?

A. Yes. CMD functionality can be, as Mr. Wills stated, duplicative of being able to download all data in a single file, but it has other uses to customers. While downloading data provides a portable file for distribution, it represents a snapshot

1 of data. CMD provides a data feed, which is very beneficial in identifying problems
2 with consumption patterns that are not immediately apparent on the customer's
3 bill and do not draw enough attention to justify using additional manhours to
4 download the data. While there can be similar alerting and analysis tools available
5 on a utility's website, a large consumer with service from multiple utilities may have
6 difficulty observing each separate utility's dashboard and navigating the right tools.
7 CMD offers automation tools through a standardized process and offers methods
8 outside of manual access to utility-hosted dashboards.

9 **Q. DOES MR. WILLS DISCUSS THE BENEFIT OF HAVING ENGAGED CUSTOMERS**
10 **COMMUNICATING THEIR DATA ACCESS NEEDS TO THE COMPANY?**

11 A. Yes. See Rebuttal Testimony of Steven Wills, page 57, line 11 to line 13. MECG is
12 very supportive of customer engagement and communication, and supports both
13 informal conversations between Ameren and its customers and a more formal
14 structure for broader stakeholder engagement on data access. As such, MECG
15 additionally recommends that the Commission establish a stakeholder process for
16 engaged customers and other interested stakeholders, and, if the Commission
17 determines it appropriate, all regulated utilities in the state, to discuss data access
18 needs with the Company, in order to ensure that the Company's efforts will result in
19 customer needs being fully met.

20 **Q. DOES THIS CONCLUDE YOUR TESTIMONY?**

21 A. Yes.