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Date Testimony Prepared: March 31, 2021

**MISSOURI PUBLIC SERVICE COMMISSION**

**FILE NO. ER-2021-0240**

**DIRECT TESTIMONY**

**OF**

**WARREN WOOD**

**ON**

**BEHALF OF**

**UNION ELECTRIC COMPANY**

**D/B/A AMEREN MISSOURI**

**St. Louis, Missouri**

**March 2021**

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**DIRECT TESTIMONY**

**OF**

**WARREN WOOD**

**FILE NO. ER-2021-0240**

**I. INTRODUCTION**

1

**Q. Please state your name and business address.**

2

3 A. My name is Warren Wood and my business address is One Ameren Plaza,  
4 1901 Chouteau Avenue, St. Louis, Missouri 63103.

3

4

**Q. By whom are you employed and in what capacity?**

5

6 A. I am employed by Union Electric Company d/b/a Ameren Missouri  
7 ("Ameren Missouri" or "Company") as Vice President, Legislative and Regulatory Affairs.

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7

**Q. Please describe your duties and responsibilities as Vice President,  
9 Legislative and Regulatory Affairs.**

8

9

10 A. I oversee state legislative and regulatory policy development and  
11 compliance for the Company.

10

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**Q. Please describe your qualifications.**

12

13 A. In December 1987, I received a Bachelor of Science degree in Civil  
14 Engineering with honors from the University of Missouri at Columbia, Missouri. Upon  
15 graduation, I accepted employment with Black & Veatch and worked in the Energy and  
16 Environmental Divisions for a little over ten years.

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17 While at Black & Veatch, I designed a wide range of power generation and water  
18 treatment facilities, acted as an engineering liaison between the design office and joint  
19 venture partner offices, developed specifications, drafted engineering drawings, designed

17

18

19

1 mechanical equipment supports, and wrote customer computer programs to assist in  
2 solving many types of engineering problems. My work while at Black & Veatch focused  
3 on new and retrofit work on coal, combustion turbine, and nuclear power plant projects.

4 I worked for Questec Engineering in Columbia, Missouri in 1997 and 1998. While  
5 at Questec, I was a project manager in charge of site development and completion of  
6 numerous engineering projects for industrial, commercial, and residential customers.

7 I worked for the Missouri Public Service Commission ("Commission") for a little  
8 over eight years. Initially, I was hired as a Regulatory Engineer in the Procurement  
9 Analysis Department of the Commission. While working in the Procurement Analysis  
10 Department, I investigated the natural gas purchasing practices of Missouri's natural gas  
11 utilities and filed testimony in the procurement analysis and actual cost adjustment audit  
12 cases. Later, I was employed as the Natural Gas Department Manager, promoted to the  
13 newly created Energy Department Manager position, and was later promoted to Utility  
14 Operations Division Director. As the Natural Gas Department Manager, I oversaw regular  
15 tariff filings at the Commission of the natural gas utilities in the state, the Commission's  
16 activities in interstate natural gas pipeline cases at the Federal Energy Regulatory  
17 Commission, and the activities of the Commission's natural gas safety section. As the  
18 Energy Department Manager, I oversaw the activities of the natural gas department  
19 sections listed above in addition to the activities of the engineering and economic analysis  
20 sections, which dealt primarily with electric utilities in the state. As the Utility Operations  
21 Division Director, I oversaw the day-to-day activities of the Operations Division, regularly  
22 participated in Commission policy development efforts, participated in discussions and

1 gave presentations to stakeholder groups and legislative committees, conducted  
2 roundtables, and facilitated rulemaking workshops.

3 While at the Commission and now with Ameren Missouri, I have filed testimony  
4 in multiple cases. I was employed by the Missouri Public Utility Alliance in 2007 and later  
5 employed as President of the Missouri Energy Development Association ("MEDA"). I left  
6 MEDA in 2010 to work for Ameren Missouri as Vice President, Legislative and Regulatory  
7 Affairs. I have held this position since 2010.

8 **Q. What is the purpose of your direct testimony in this proceeding?**

9 A. The purpose of my testimony is to provide a summary of the Company's  
10 filing to increase its rates for electric service, outline the main drivers of the filing and why  
11 an increase is necessary to establish just and reasonable rates, to report on the progress  
12 Ameren Missouri is making in implementing its Smart Energy Plan ("SEP"), and to discuss  
13 the status of another important Company initiative to support customer affordability.

14 **II. SUMMARY OF AMEREN MISSOURI'S FILING**

15 **Q. Can you summarize Ameren Missouri's filing in this case?**

16 A. As is set forth in detail in the direct testimony of Ameren Missouri witness  
17 Mitchell Lansford, the Company has filed tariffs that reflect an increase of \$299 million or  
18 12% in its overall revenue requirement. This amount reflects significant capital  
19 investments in our system as part of our SEP and the addition of two major wind generation  
20 facilities in 2020 and 2021. The SEP investment is designed to maintain and improve the  
21 reliability of our system and to also provide customers additional convenience, choice and  
22 control over the way they use energy and, ultimately, in how that energy usage impacts  
23 their total electric bill. This investment has been successful in addressing specific

1 reliability concerns in certain areas of our system. Ameren Missouri customers have  
2 experienced fewer interruptions on stormy and non-stormy days since the implementation  
3 of our SEP. Specifically on individual circuits where distribution automation switches were  
4 installed, customers have seen up to a 40% reliability improvement.

5 The wind investment is likewise beneficial and low cost. The two wind facilities  
6 will provide 700 megawatts ("MW") of wind generation capacity, providing additional  
7 diversity in the Company's generation portfolio and enabling compliance with Missouri's  
8 Renewable Energy Standard ("RES"). Because of production tax credits and the benefit of  
9 additional energy sales, this renewable generation is being added in a manner that is a low  
10 cost to our customers, especially when viewed over the lifetime of the facilities.

11 In addition, consistent with our Preferred Resource Plan filed in the Company's  
12 2020 Integrated Resource Plan ("IRP") filing,<sup>1</sup> this revenue requirement also sets  
13 depreciation rates for our Sioux and Rush Island coal generation facilities so that they align  
14 with the now earlier expected retirement dates of those plants.

15 Finally, because our Meramec generation facility will be retired within ten months  
16 of the expected effective date for new rates in this case, we have reduced the revenue  
17 requirement by \$55 million through the removal of prudent capital and operating and  
18 maintenance costs (including depreciation expense, non-labor maintenance, return on rate  
19 base and other costs related to the facility). This reduction in the revenue requirement  
20 reflects our request to recover the expected remaining costs over a five-year period, starting  
21 with the effective date of new rates in this case. This helps to mitigate the rate increase

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<sup>1</sup>File No. EO-2021-0021.

1 requested in this case and to ensure that our rates reflect no more and no less than the actual  
2 remaining operation and ownership costs associated with the Meramec facility.

3 **Q. What initiatives is the Company advancing in this case with respect to**  
4 **rate design, tariff issues, and customer programs?**

5 A. As the Commission is aware, modernization of our residential rate offerings  
6 was a major theme of our last electric general rate proceeding.<sup>2</sup> In that case, we introduced  
7 innovative new time of use ("TOU") rate offerings for residential customers, along with a  
8 robust plan to provide customers with education and information regarding TOU rates. The  
9 Company is currently investing in new digital tools that are enabled by our deployment of  
10 Automated Metering Infrastructure ("AMI") to empower customers to take more control  
11 of their energy usage and bills. The greater level of choice and control we are providing to  
12 customers with our TOU rate options is reflected in this filing as well, with a continuation  
13 of all of the new TOU rate plans, and a few minor updates to rate parameters to continue  
14 to ensure that the rates reflect costs and feature appropriate price signals to encourage  
15 customers to make changes to their usage that provide benefits to the system, including  
16 helping to integrate the higher level of renewable generation reflected in our IRP.  
17 Company witness Steven Wills further discusses this dynamic in his direct testimony.

18 Our filing also features a request for a new tracker related to revenue changes that  
19 may arise from residential customer rate switching. This tracker helps ensure that  
20 customers' adoption of new rates that better reflect cost and match their lifestyle does not  
21 negatively impact Company revenues between rate filings. This tracker is an important  
22 policy tool to align the incentives of the Company with its customers to help them find the

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<sup>2</sup>File No. ER-2019-0335.

1 most attractive rate, and its approval is a critical element in a successful long-term  
2 transition to modern rates.

3 On the renewable energy front, the Company is proposing to move its successful  
4 Community Solar program from pilot status into a permanent and scalable program  
5 offering. While the program concept is grounded firmly in the already successful pilot  
6 model, there are enhancements to the program that allow customers to choose to enroll up  
7 to 100% of their load, whereas the pilot limited subscription to 50% of a customer's  
8 historical usage level. Further, the updates to the program enable it to be compatible with  
9 the new TOU rate offerings, such that enrolling customers may now still elect any rate  
10 option, including advanced TOU rates, for billing of any usage that is not being covered  
11 by the program. Company witnesses Annemarie Nauert and Nick Bowden provide more  
12 details on the updated Community Solar program in their direct testimonies.

13 The Company is also proposing, in the direct testimony of Mr. Lansford, to  
14 eliminate the additional fees customers currently incur when paying their bills with credit  
15 cards. This change provides more flexibility for customers to choose the payment channel  
16 that is best for them without incurring additional costs, and aligns with practices that  
17 consumers expect based on the way they interact with other vendors and service providers.

18 **III. ECONOMIC CONDITIONS**

19 **Q. As this case is filed, Ameren Missouri's service territory has not fully**  
20 **recovered from the impacts of the COVID-19 pandemic. Has this had an impact on**  
21 **Ameren Missouri and upon its request in this case?**

22 A. As the Commission is likely aware, Ameren Missouri indicated, as its last  
23 rate case concluded in early 2020, that it planned to file another case shortly so it could



1 place the costs and benefits of its wind generation facilities into its cost of service. The  
2 multiple and immediate impacts of the pandemic, however, caused the Company to rethink  
3 its plans. Rather than filing another rate case in 2020, Ameren Missouri shifted its filing  
4 until March of 2021 to delay the impact of new rates until 2022.

5 **Q. How has the pandemic impacted Ameren Missouri's relationship with**  
6 **its customers?**

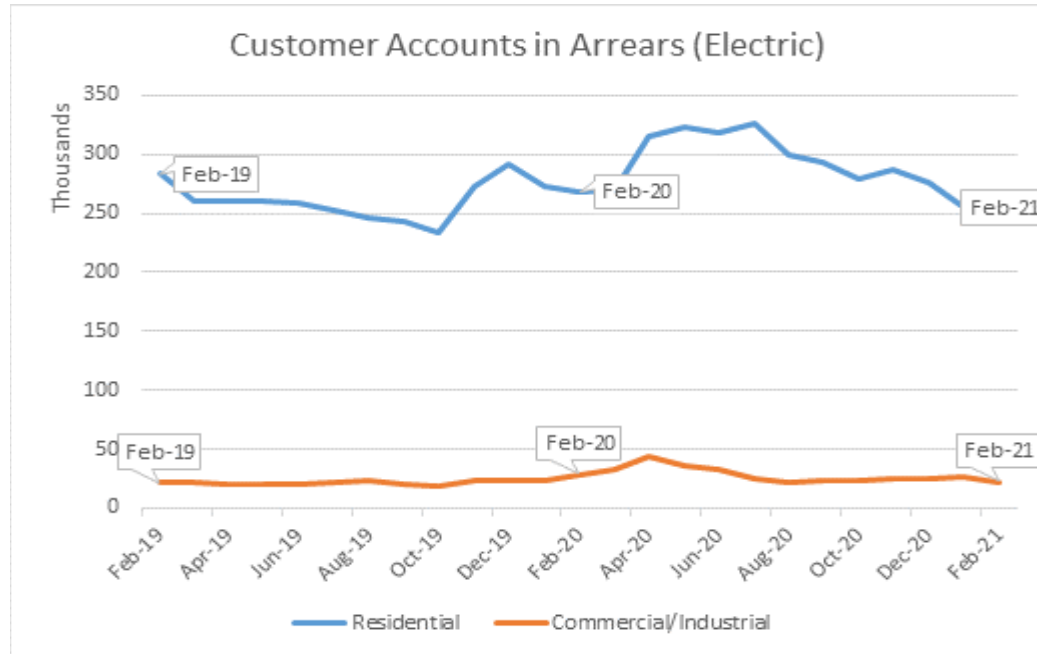
7 A. Ameren Missouri has earnestly endeavored to be a good corporate citizen  
8 during these difficult times. We sought a balanced approach to help our customers keep  
9 the power on without accumulating unmanageable arrearages. We have focused much of  
10 our effort on assisting low-income customers and those directly impacted by COVID-19.  
11 None of our actions were required by the Commission; they were all voluntarily  
12 undertaken, with support from the Commission Staff and the Office of the Public Counsel  
13 (as well as the Commission) as needed for variances and waivers. Schedule WW-D1  
14 attached to my testimony is a fact sheet laying out the different actions the Company has  
15 taken on behalf of its customers in light of the pandemic.

16 In mid-March, swiftly after recognition of the pandemic situation emerging in our  
17 area, Ameren Missouri enacted a disconnection moratorium for all customer accounts,  
18 waived late fees, and reconnected recently disconnected customers at no charge. While the  
19 voluntary disconnection moratorium was in place, we worked to develop additional ways  
20 to help our customers. We recognized that a disconnection moratorium without a means to  
21 help keep arrearages under control could cause our customers more harm in the long run.  
22 We met regularly with the social service agencies to discuss their ideas of how to help our  
23 customers. We began aggressive outreach, using email, letters, telephone calls, press

1 releases, and social media to inform customers of programs available to assist them. We  
2 provided various types of energy assistance to help mitigate accumulating customer  
3 arrearages. We moved funding between programs in order to increase the available amount  
4 of bill assistance funding. We modified existing assistance programs to increase the  
5 number of customers who could participate. We made changes to our low-income energy  
6 efficiency programs to reach more customers in need, which also kept the program vendors  
7 working. Ameren Missouri has been thoughtful and deliberate in its efforts to help our  
8 customers and communities deal with the financial impacts of COVID-19. And that initial  
9 disconnection moratorium gave us the time to develop and implement all of these  
10 measures.

11 Ameren Missouri lifted its disconnection moratorium in stages beginning in July.  
12 At the same time, we offered payment plans with more generous terms, allowed additional  
13 time for Low Income Home Energy Assistance Program applications to be processed, and  
14 provided additional funding through our Clean Slate program. The success of our actions  
15 is demonstrated by Figure 1, which depicts the number of accounts in arrears from February  
16 of 2019 through February of 2021. Figure 1 shows a definite increase in the first half of  
17 2020, but also shows that number going back to the pre-COVID-19 level towards the end  
18 of 2020 and into early 2021.

**Figure 1**



1           **Q.     Beyond the measures you mention above, did the pandemic cause**  
2 **Ameren Missouri to change the way it operated its business?**

3           A.     There have been many changes made to the way we operate our business.  
4 Many of our employees have been working remotely since mid-March of 2020. For those  
5 employees who cannot work remotely, we have installed additional protective measures:  
6 we have installed Plexiglas at work stations, required masks to be worn, brought in trailers  
7 at facilities where there was no room to socially distance, and conducted contact tracing  
8 for all known cases. Our efforts appear to have been successful, as we do not believe there  
9 have been any cases of COVID-19 transmission that occurred at Ameren Missouri  
10 facilities.

11           **Q.     Did the pandemic have other impacts upon the Company?**

12           A.     It did. The two wind generation facilities that were constructed for Ameren  
13 Missouri experienced delays associated with the pandemic, as is discussed below. This has

1 resulted in a delay of the in-service date for some of the turbines and also played a role in  
2 Ameren Missouri deciding to delay this rate filing until this spring.

3 **IV. CUSTOMER AFFORDABILITY**

4 **Q. Given the impact of the pandemic, why is Ameren Missouri filing to**  
5 **increase its rates at this time?**

6 A. Ameren Missouri has filed this rate case because its prudently incurred costs  
7 to serve customers have increased since its rates were last set. Many of the reasons for the  
8 rate request are set forth below – to recover capital investments in our SEP and wind  
9 generation facilities, as examples. At the same time, the Company believes it must work to  
10 keep rates affordable, consistent with delivering safe and adequate service while also  
11 transitioning to more renewable power as set forth in Ameren Missouri's IRP. To help us  
12 achieve that balance, we have launched an initiative to ensure that during this time of major  
13 system investment, we don't forget to focus on customer affordability.

14 Some of this effort has already come before the Commission, including recent  
15 examples such as our new Efficient Electrification and Surge Protection programs. These  
16 programs are designed to bring in additional revenues, which will ultimately be offsets  
17 against the overall revenue requirement needed to provide service to our customers. At the  
18 Missouri legislature, Ameren Missouri is seeking legislative changes that, if passed, would  
19 greatly facilitate its ability to capture value for its customers from available capacity in its  
20 fiber network in the form of new revenues that will offset its revenue requirement and  
21 lower customer bills.

22 Ameren Missouri is also working to hold costs level, and to decrease those  
23 expenditures when it makes sense to do so. As an example, technological advances in

1 mechanized trimmers allow Ameren Missouri to use these devices in previously  
2 inaccessible spaces. The use of these trimmers has decreased annual vegetation  
3 management costs by \$5 million as compared to amounts in our previous rate case. As  
4 another example, our digital group has automated highly repetitive, rules-based tasks that  
5 would otherwise be performed manually. The team automated more than 40 processes,  
6 saving a cumulative 50,000 annual labor hours, which allows us to redeploy those hours to  
7 other efforts. We recognize this must be a continual effort and that it will take time to  
8 achieve our desired result, but we believe this effort is the best way to ensure the Company  
9 can invest as it needs and still provide affordable service for our customers.

10 **V. WIND GENERATION FACILITIES**

11 **Q. You stated earlier that this case includes the Company's investment in**  
12 **two wind projects that the Company now owns for the purpose of compliance with**  
13 **the Missouri RES. Please tell us about those facilities.**

14 A. Ameren Missouri is very happy to have added these wind resources to its  
15 generation mix, as part of its efforts to comply with the Missouri RES, which also  
16 contributes to its goal of achieving net-zero carbon emissions by 2050.

17 As the Commission knows, in 2018-2019, the Company obtained certificates of  
18 convenience and necessity from the Commission giving it permission to construct both the  
19 High Prairie wind project ("High Prairie") and the Atchison (formerly referenced as  
20 Outlaw) wind project ("Atchison"), each via a Build Transfer Agreement ("BTA") with a  
21 project developer.<sup>3</sup> Under the BTAs, the project developers were to construct the facilities  
22 to the agreed-upon specifications; when complete, Ameren Missouri was to purchase the

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<sup>3</sup>See File Nos. EA-2018-0202 and EA-2019-0181.

1 "project companies" (both of which were limited liability companies) that owned the wind  
2 farm assets and then merge the project companies into Ameren Missouri. The result would  
3 be that Ameren Missouri would own the entirety of the wind farm assets directly, the same  
4 as if Ameren Missouri had built the projects itself. Originally, it was expected that by the  
5 end of 2020, both projects would be complete and that Ameren Missouri would own them.  
6 The timing of the purchases was to allow Ameren Missouri to obtain the maximum  
7 available federal production tax credits ("PTCs") on each megawatt-hour of energy the  
8 facilities would produce and pass the benefit of those PTCs back to our customers under  
9 the Renewable Energy Standard Rate Adjustment Mechanism ("RESRAM") approved by  
10 the Commission in File No. EA-2018-0202.

11 **Q. Has the Company purchased the two facilities?**

12 A. Yes. Ameren Missouri closed on its purchase of the project company that  
13 developed the High Prairie Renewable Energy Center on December 22, 2020, and on its  
14 purchase of the project company that developed the Atchison Renewable Energy Center  
15 on January 14, 2021. While the Atchison facility was not acquired until 2021, I should  
16 note that changes in federal law adopted by Congress, in part due to delays in wind farm  
17 development caused by the COVID-19 pandemic, mean that Ameren Missouri will still  
18 obtain the full value of the PTCs for the benefit of its customers. I should also note,  
19 however, that not all of the turbines that will ultimately comprise the Atchison facility are  
20 yet in service due to construction delays caused by the pandemic and other construction  
21 delays encountered by the developers. There is also one turbine (2.2 of the 400 MW) at  
22 High Prairie which is also undergoing additional work to meet the required specifications.  
23 We expect that work to be completed shortly. However, the developer continues to finish

1 those turbines and as work is completed, Ameren Missouri will pay for them and put them  
2 in service. It is also important to emphasize, as I noted earlier, that the delay in completing  
3 all the turbines has no impact on their ability to qualify for the full PTC value they would  
4 have received had they been completed in 2020.

5 **Q. Did the BTAs address the possibility of construction of some turbines**  
6 **not being completed when Ameren Missouri purchased the project company?**

7 A. Yes, they did. The terms of the BTAs were designed to hold Ameren  
8 Missouri customers harmless from a delay in completion of any wind turbine.

9 **Q. When does the Company expect all of the turbines at both projects to**  
10 **be complete?**

11 A. At High Prairie, the remaining turbine is being repaired and is expected to  
12 be completed in early April 2021. At Atchison, construction of the remaining turbines is  
13 expected to be complete by the end of September 2021.

14 **Q. Does the addition of this new renewable generation significantly**  
15 **increase the amount Ameren Missouri's customers will pay for electricity?**

16 A. No. While we are investing \$1.1 billion in two new wind facilities, the  
17 impact on the revenue requirement is only \$8 million. We have successfully timed these  
18 additions in a manner that provides additional, clean renewable power at an affordable cost  
19 for our customers. First, we made sure that these facilities would obtain the benefit of the  
20 PTCs which are available for wind generation. This alone decreases the cost to customers  
21 of these facilities by around \$81 million. Then there is the fact that the plants will increase  
22 Ameren Missouri's overall energy production, with the excess power being sold into the  
23 market. We anticipate these additional energy sales will increase revenues by \$57 million,

1 which is credited back to customers in base rates and through the fuel adjustment clause  
2 ("FAC").

3 **VI. SMART ENERGY PLAN**

4 **Q. Earlier you mentioned that Ameren Missouri was making progress on**  
5 **its SEP. Can you describe that undertaking?**

6 A. The SEP stems from Senate Bill 564, which became law in August of 2018.  
7 This law allows Ameren Missouri to use Plant-in-Service Accounting ("PISA") to offset a  
8 portion of the negative lag associated with utility capital investments; at the same time, the  
9 law requires the Company to limit the growth of its rates to a compound annual growth rate  
10 of two and eighty-five hundredths percent.<sup>4</sup> The negative lag inherent in capital  
11 investments made it difficult to invest at the level that electric utilities, including Ameren  
12 Missouri, needed to in order to accelerate modernization of the grid for the benefit of its  
13 customers. Reducing that disincentive has allowed Ameren Missouri to increase  
14 investment in its distribution system and other plant with the goal of improving system  
15 reliability, resiliency, and security. The SEP is the investment plan for Ameren Missouri  
16 enabled by PISA.

17 **Q. Can you provide some examples of investments that are part of the**  
18 **Company's SEP?**

19 A. There are many, and they occur across the Company's operations. As the  
20 Commission is aware, Ameren Missouri and other participating utilities file a five-year  
21 capital investment plan each February. Ameren Missouri's plans can be found in File No.

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<sup>4</sup>Section 393.1655.4. All rates, base and under riders, are included in the 2.85% compound annual growth rate limitation except those arising from Commission-approved demand-side management programs.



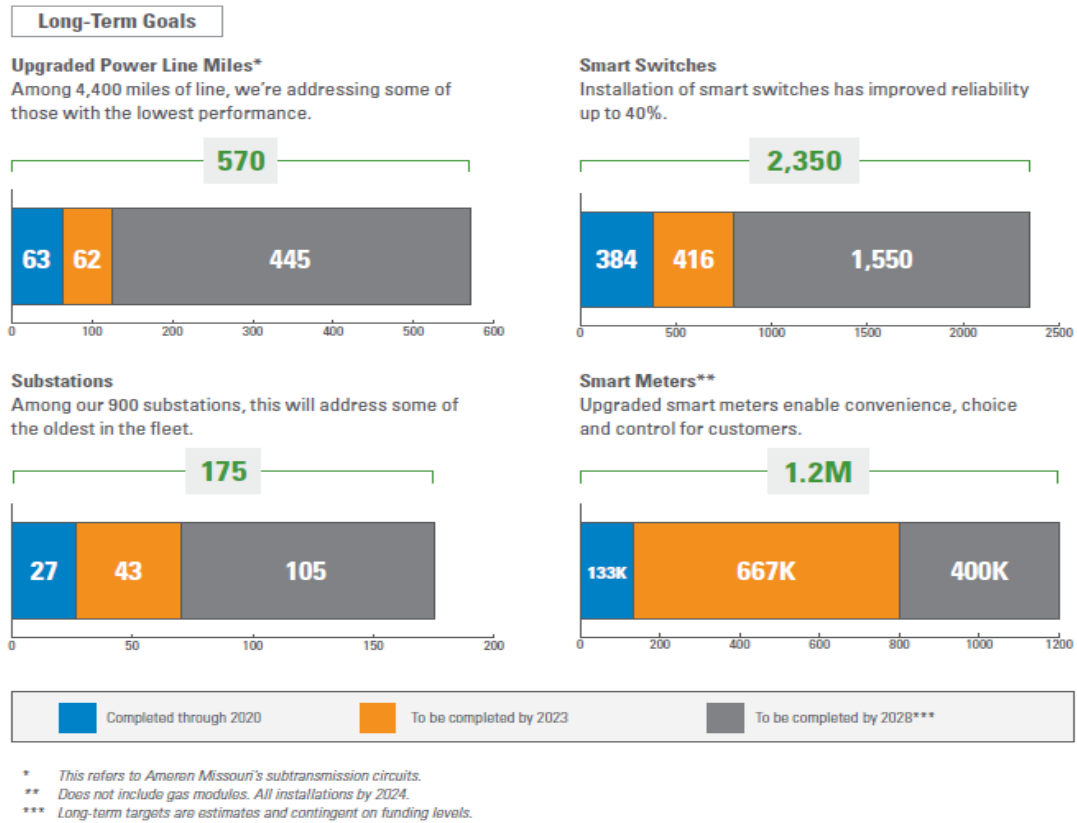
1 EO-2019-0044. Focusing on the distribution portion of the Company's business, Ameren  
2 Missouri has tailored its investment to target several long-term goals, including:

- 3       • the installation of over 2,350 smart switches to improve reliability;
- 4       • the upgrading of power lines and the use of stronger composite poles to protect  
5       during bad weather;
- 6       • the construction of 175 new or upgraded substations to address aging infrastructure  
7       and serve communities; and,
- 8       • the installation of approximately 1.2 million smart meters to provide our customers  
9       more options.

10 Ameren Missouri believes it has made progress on all of these goals, which provide our  
11 customers with a stronger, smarter, and more resilient and secure electric grid.

12       Figure 2 below illustrates the types of distribution investments the Company has  
13 completed and those planned to be installed in the future.

Figure 2



- 1 These investments have improved the quality of service that we provide for our customers.
- 2 A few examples of the system improvements that have occurred since Ameren Missouri
- 3 implemented the SEP are set forth below:

4 Florissant/North St. Louis County (Substation)

5 A new substation with automated sensors and smart  
6 technology equipment will create a self-healing  
7 system that more rapidly detects and isolates outages,  
8 speeding power restoration. This is among a number  
9 of new substations planned for North St. Louis  
10 County residents, which will provide improved  
11 reliability to thousands of customers. This will  
12 upgrade an existing substation, which is more than 50  
13 years old, with more modernized equipment and  
14 technology.





1 Overall, these investments have meant that Ameren Missouri customers have  
2 experienced fewer interruptions, whether the weather is stormy or not. For the individual  
3 circuits where distribution automation switches have been installed, customers have seen  
4 up to a 40% improvement in reliability of service.

5 **Q. What is the best example of investments being made to improve service**  
6 **for customers?**

7 A. Installation of an AMI system accomplishes a number of service  
8 enhancements that benefit customers. As the Commission is aware, we have been installing  
9 AMI meters at customer locations since July of 2020. These meters do so much more than  
10 our previous meters were capable of doing and will, especially over time, provide  
11 customers with many benefits. AMI meters enable quicker restoration after outages and  
12 faster connection when moving or starting service. They provide customers options to  
13 choose a rate that fits their lifestyle. Many of those choices were enabled in Ameren  
14 Missouri's last rate case. The roll out of AMI meters allows for broader participation and  
15 benefit from those options. Finally, a significant benefit to all customers, whether they  
16 enroll in a TOU rate or not, smart meters allow for customers to reduce their energy costs  
17 by providing customers with more precise energy usage information to allow them to shift  
18 their energy usage and potentially save on their bills.

19 Finally, it should be noted that of the SEP work contracted out externally,  
20 approximately 57% of that work went to Missouri-based companies. Further, 32% of those  
21 dollars were spent with diverse vendors. This keeps Ameren Missouri's investment in our  
22 state, helps with Missouri's overall employment levels, and keeps the economic multiplier  
23 benefit of this spend within Missouri.



<b>Witness</b>	<b>Title and Company</b>	<b>Testimony Subject</b>
Tom Byrne	Senior Director – Regulatory Affairs Ameren Missouri	Rate Case Expense
Darryl T. Sagel	Vice President and Treasurer Ameren Missouri and Ameren Services Company	Capital Structure; Cost of Debt, and Overall Rate of Return
Mark Peters	Manager Load Forecasting & Market Analysis Ameren Services Company	Production Cost Model
Andrew M. Meyer	Senior Director – Energy Management & Trading Ameren Missouri	Fuel Adjustment Clause
Steven M. Wills	Director – Rates & Analysis Ameren Missouri	Rate Design, Revenues, Rate Cap, RESRAM Rebase
Tom Hickman	Regulatory Rate Specialist Ameren Missouri	Class Cost of Service Study
Nick Bowden	Regulatory Rate Specialist Ameren Missouri	Weather Normalization, Billing Units, Community Solar tariffs
Mike Harding	Manager, Rates & Analysis Ameren Missouri	Tariff changes, AMI - related issues, Rates
Annemarie Nauert	Program Supervisor, Renewable Energy Ameren Missouri	Community Solar
John Reed	Chairman and Chief Executive Officer Concentric Energy Advisors, Inc. and CE Capital Advisors, Inc.	Affiliate Transactions
Anne Bulkley	Senior Vice President Concentric Energy Advisors, Inc.	Return on Equity
John J. Spanos	President Gannett Fleming Valuation and Rate Consultants, LLC	Depreciation Study

Direct Testimony of  
Warren Wood

<b>Witness</b>	<b>Title and Company</b>	<b>Testimony Subject</b>
Ahmad Faruqui	Principal The Brattle Group	Rate Design – Industry trends and the need for residential tariff reforms

1           **Q.     Does this conclude your direct testimony?**

2           **A.     Yes, it does.**



# Customer Assistance - Pandemic Onset: March 13, 2020

Temporary Emergency Credit Policy Changes due to COVID 19
Suspend Disconnections – residential and commercial customers
Reconnection of recently disconnected accounts
New COVID 19 Payment Agreement – 12% down/spread balance over 12 months
Allow Keeping Current customers to remain on the program with 2 missed payments

3 New Energy Assistance Programs by 3/19/2020			
Program Name	Target	Implementation Partner	Outcome
<b>Income Relief Program</b>	Customers with income interruption due to COVID19; \$30K - \$60K	United Way	2000 customers received \$250 each - \$500K total
<b>Heat Up COVID 19 Relief</b>	Elderly, disabled and low-income customers; \$0 - \$29 999	Heat Up Missouri	3696 customers received assistance; \$480K total
<b>Internal Pandemic Hardship Relief Fund</b>	Assistance for customers calling into the contact center with hardships	Ameren Missouri Customer Care Advisors	135 customers received 11,693 in assistance

**LIHEAP Extension – New Flyer**  
Coming soon to the Easy Button  
Distributed to 350 Agencies and Community Partners



If you need help paying your Ameren Missouri electric or gas bill, you may be eligible for help through the Low Income Home Energy Assistance Program (LIHEAP) and the Emergency Crisis Intervention Program (ECIP). These programs are available through the Missouri Department of Social Services. Customers can apply for help with their gas and/or electric service through May 31, 2020. From June 1 – September 30, 2020, customers can apply for help with their electric service only.

**To be eligible, customers must:**

- Be responsible for paying home heating costs,
- Have \$3,000 or less in bank accounts, retirement accounts, or investments,
- Have a household income less than 135 percent of the federal poverty level (a monthly income of \$2,400 for a family of three or \$2,897 for a family of four) and,
- Be a U.S. citizen or legally admitted for permanent residence.

**You'll need the following documents to apply:**

- A letter from your employer on company letterhead with details about how your employment and wages have been impacted by the coronavirus.
- Recent home energy bill to qualify for LIHEAP (electricity, natural gas or propane).
- To qualify for ECIP, a disconnection letter or payment reminder letter is needed, or ask your energy assistance agency to contact the utility to confirm your account status.
- Copies of social security cards for all household members.
- Copies of income documentation such as paystubs (for the current month), current award letters or current pension statements (if your household currently receives food stamps, income documentation is not required).

Visit [dss.mo.gov/fsd/energy-assistance](https://dss.mo.gov/fsd/energy-assistance) to apply.

Learn more about other assistance options and account management tools by visiting [AmerenMissouri.com/EnergyAssistance](https://AmerenMissouri.com/EnergyAssistance) or calling 800.552.7583.




**LIHEAP Extension - Social Media**  
16K+ impressions

**Dollar More - Neighbors Helping Neighbors**  
Every dollar makes a big difference.



**Help Lift Up Your Community**  
Ameren Missouri is matching all donations up to \$25,000.  
[Login and Donate Today](#)

**How You Can Help**  
You can make a difference. By enrolling in Dollar More and adding just \$1.00 per month to your energy bill, you will join others who have helped families in need with their energy costs. Dollar More assists families with their home energy costs through voluntary donations. Together with the United Way and a network of human service agencies, 100% of all donations go to help families in need within the Ameren Missouri service territory.  
All donations are tax deductible.

-  Ameren Account
-  Call Us
-  Mail, Email, or Fax
-  Agency Finder

**Launching New and Improved Dollar More site**  
Easier ways to donate including new credit card option



# 2020: Ameren Missouri Customers received \$27,687,417 in funding from Energy Assistance Programs, including over \$5M in COVID-19 Relief

## Coronavirus Income Relief Programs - \$1M



5936 customers with income reduced due to the pandemic crisis received up to \$250 in assistance

## Internal Pandemic Relief Program



*"Thank you Ameren Missouri for understanding and helping us all that have been impacted by COVID-19"*

Customer served by Customer Care Advisor

Ameren Missouri Customer Care Advisors received \$250 each to grant to 193 customers needing assistance due to the pandemic crisis (\$17,052)

## COVID-19 Small Business Relief Program - \$500K



1703 eligible small businesses and non-profits received up to \$250 in bill credits

## \$3.5M COVID-19 Clean Slate Program



6518 customers paid 25% and Clean Slate funds covered the remaining balance in phase 1 (summer) and up to \$500 phase 2 (fall/winter)

## Summer Relief Efforts



Ameren Missouri donated 1000 air conditioners and 1000 packs of LEDs to elder and disabled customers through Cool Down Missouri.

LIHEAP increased its summer program benefit from \$300 to \$600 and temporarily increased the income eligibility from 135% of the federal poverty level to 150%

## Internal Joy of Giving Campaign



During the holidays, Customer Care Advisors received \$250 each to grant to 231 customers needing assistance (\$20,889)

