

BEFORE THE PUBLIC SERVICE COMMISSION  
OF THE STATE OF MISSOURI

In the Matter of Union Electric Company d/b/a                    )  
Ameren Missouri’s Tariffs to Decrease its                    )       Case No. ER-2019-0335  
Revenues for Electric Service                                    )

**NATURAL RESOURCES DEFENSE COUNCIL’S RESPONSE TO “ORDER  
DIRECTING RESPONSES”**

The Natural Resources Defense Council (NRDC) has considered the questions posed in the Commission’s Order of March 5. The Stipulation and Agreement in question was the result of arduous and productive negotiation among the parties, and NRDC is open to further discussion in the event the Commission does not approve it. In answer to the questions posed in the Order, NRDC responds:

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

Yes. NRDC is generally in favor of giving net-metered customers the same options as other residential customers to shift their demand off-peak absent a compelling reason to do otherwise.

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

No. NRDC favors giving customers the flexibility to shift demand. In particular, EV customers should have an incentive to charge off-peak. On the other hand, there are occasions when peak pricing can pose a threat to public health and safety, as when elderly customers need air-conditioning during peak times on summer days but would be discouraged by high time-of-use rates. Therefore NRDC does not favor the kind of rate

envisioned in the order as the default option.

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

Yes. NRDC supports customer engagement and education and therefore agrees with the proposal order of receiving status reports and presentations on this subject at agenda.

Respectfully submitted,

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### **CERTIFICATE OF SERVICE**

I hereby certify that a true and correct PDF version of the foregoing was filed on EFIS and sent by email on this 9th day of March, 2020, to all counsel of record.

/s/Henry B. Robertson  
Henry B. Robertson