

**BEFORE THE PUBLIC SERVICE COMMISSION  
OF THE STATE OF MISSOURI**

Charles Harter,	)	
	)	
Complainant,	)	
	)	
v.	)	<b><u>Case No. EC-2021-0285</u></b>
	)	
Union Electric Company d/b/a	)	
Ameren Missouri,	)	
	)	
Respondent.	)	

**STAFF REPORT**

**COMES NOW** the Staff of the Missouri Public Service Commission (“Staff”), by and through the undersigned counsel, and for its *Staff Report* respectfully states:

1. On March 11, 2021, Charles Harter (“Complainant”) filed a small formal complaint (“Complaint”) against Union Electric Company d/b/a Ameren Missouri (“Respondent”).
2. Complainant alleges that Respondent violated Commission Rules 4240-13.020(9)(G), 20 CSR 4240-13.040(2), 20 CSR 4240-13.055(6), and 20 CSR 4240-13.055(10)(B)(5).
3. Also on March 11, 2021, the Commission issued its *Order Giving Notice of Case Filing, Directing an Answer and Directing a Staff Investigation*. The Commission ordered Respondent to file an Answer to the Complaint no later than April 9, 2021, and directed Staff to conduct an investigation of the Complaint and file a report no later than May 10, 2021.
4. Respondent filed a *Motion for Extension of Time* on April 9, 2021, requesting a 21 day extension to file its Answer, noting that Respondent and Complainant were working together to resolve the Complaint. The Commission granted Respondent’s request on April 12, 2021, and ordered Respondent to file its Answer no later than April 30, 2021.

5. On April 30, 2021, Respondent filed its Answer to the Complaint

6. On May 5, 2021, due to supplemental data requests issued by Staff to Respondent, Staff requested, and the Commission granted, an extension to file its report no later than May 24, 2021.

7. Having concluded its investigation, Staff offers its *Staff Report*, which details Staff's investigation and analysis, attached hereto as Appendix A ("Report of the Staff"). In summary, Staff concludes that Respondent has not violated any applicable statutes, Commission rules, or Commission-approved Respondent tariffs related to the Complaint.

8. Staff does note, however, that Respondent did have issues complying with Commission Rule 20 CSR 4240-13.040(2), the rule establishing the minimum personnel procedures for dealing with customer inquiries, on November 2, 2020. The relevant portion of the rule reads:

"A utility shall establish personnel procedures which, at a minimum, ensure that (A) At all times during normal business hours qualified personnel shall be available and prepared to receive and respond to all customer inquiries, service requests, safety concerns, and complaints. . . (B) At all times during normal business hours, qualified personnel responsible for and authorized to enter into written agreements on behalf of the utility shall be available to respond to customer inquiries and complaints; (C) Qualified personnel shall be available at all times to receive and initiate response to customer contacts regarding any discontinuance of service or an emergency condition related to the utility's operations occurring within the utility's service area . . ."

9. Due to problems with Respondent's Interactive Voice Response (IVR) middleware not permitting customers to set up a payment arrangement without speaking to an advisor, Respondent experienced heavy call volume at the beginning of the Cold Weather Rule enrollment period during normal business hours. This in turn led to the routing of calls to Respondent's overflow vendor, which led to the disconnection of those customers' calls.

10. Respondent discovered and addressed the issue on November 2, 2020, and informed Staff that Ameren is considering replacing the current overflow vendor, as well as enabling improved options for customers to choose from. Thus, Staff has concluded that the issue is not a violation of Commission Rule 20 CSR 4240-13.040(2).

11. However, Staff nonetheless recommends that Respondent continue to evaluate and improve the overflow process to prevent the disconnection of customer calls during times of high volume in the future.

12. Staff's findings and analysis in the attached Appendix A more fully explains the circumstances that led Staff to its conclusions and recommendations.

**WHEREFORE**, Staff hereby tenders its *Staff Report* for the Commission's information and consideration.

Respectfully Submitted,

**/s/ Travis J. Pringle**

Travis J. Pringle

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### **CERTIFICATE OF SERVICE**

I hereby certify that copies of the foregoing have been mailed, hand delivered, transmitted by facsimile or electronically mailed to all parties and/or counsel of record this 24th day of May, 2021.

**/s/ Travis J. Pringle**