

**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 Variance from) **File No. EE-2019-0385**
4 CSR 240-13.020(6)) Tracking No. YE-2019-0217

**STAFF’S RECOMMENDATIONS REGARDING
UNION ELECTRIC COMPANY D/B/A AMEREN MISSOURI’S
REQUESTED VARIANCES AND TARIFF FILING**

COMES NOW the Staff of the Public Service Commission of the State of Missouri and states to the Commission the following regarding the tariff sheets filed by Union Electric Company d/b/a Ameren Missouri (“Ameren Missouri”) on June 5, 2019, and substituted on June 13, 2019:

1. On June 5, 2019 Ameren Missouri filed a request for variance from Commission rule 4 CSR 240-13.020(6) (“Request for Variance”), along with five proposed tariff sheets. Ameren Missouri also seeks relief from the 60-day notice requirement of 4 CSR 240-4.017.¹ On June 6, 2019, the Commission ordered Staff to file its Recommendation no later than June 20, 2019. On June 13, 2019, Ameren Missouri filed a substitute tariff sheet, MO.P.S.C. Schedule No. 6 4th Revised Sheet No. 95.1, to correct a typo in the tariff sheet revision number.

2. Staff has reviewed Ameren Missouri’s Request for Variance Application and submits its Recommendation in the accompanying Memorandum, which is incorporated herein by reference. As reflected in Staff’s Memorandum, Staff recommends that (i) if the Commission grants Ameren Missouri a variance from 4 CSR 240-13.020(6) it also grant Ameren Missouri a variance from 4 CSR 240-13.015(1)(C); and (ii) if the Commission

¹ Staff does not object to Ameren Missouri’s request regarding 4 CSR 240-4.017.

grants Ameren Missouri a variance from 4 CSR 240-13.020(6) and 4 CSR 240-13.15(1)(C), the Commission issue an order rejecting the tariff sheets filed on June 5, 2019, and as substituted on June 13, 2019, in Case No. EE-2019-0385 and Tariff Tracking No. YE-2019-0217, and order Ameren Missouri to re-file the same five tariff sheets listed below² with the addition of language reflecting the approved variances from Chapter 13.

P.S.C. MO. No. 6

4th Revised Sheet No. 95.1, CANCELLING 3rd Revised Sheet No. 95.1
1st Revised Sheet No. 130, CANCELLING Original Sheet No. 130
2nd Revised Sheet No. 136, CANCELLING 1st Revised Sheet No. 136
2nd Revised Sheet No. 137, CANCELLING 1st Revised Sheet No. 137
3rd Revised Sheet No. 138, CANCELLING 2nd Revised Sheet No. 138

WHEREFORE, Staff submits its Recommendation as ordered by the Commission.

Respectfully Submitted,

/s/ Ron Irving

Ron Irving
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² This will probably require a new Issue Date and Effective Date for the tariff sheets.

CERTIFICATE OF SERVICE

I hereby certify that copies of the foregoing have been mailed, hand delivered, transmitted by facsimile or electronically mailed to all counsel of record this 20th day of June, 2019.

/s/ Ron Irving

MEMORANDUM

TO: Missouri Public Service Commission Official Case File,
File No. EE-2019-0385, Tariff Tracking No. YE-2019-0217
Union Electric Company, d/b/a Ameren Missouri

FROM: Kim Cox, Tariff/Rate Design Department, Commission Staff Division
Michelle A. Bocklage, Tariff/Rate Design Department, Commission Staff Division
Ben Rankin, Customer Experience Department, Commission Staff Division
Tammy Huber, Customer Experience Department, Commission Staff Division

/s/ Robin Kliethermes / 06-20-19 /s/ Ron Irving / 06-20-19
Tariff/Rate Design Manager/Date Staff Counsel's Office/Date

SUBJECT: Staff Recommendation Regarding Ameren Missouri's request for variances and implementing tariff.

DATE: June 20, 2019

Overview

On June 5, 2019, Ameren Missouri ("Ameren Missouri" or "Company") filed a notice of case filing and request for variance along with tariff revisions. Ameren Missouri requested a variance from Commission rule 4 CSR 240-4.017 to waive the 60-day notice of case filing. Ameren Missouri also requested a variance from 4 CSR 240-13.020(6) which requires utilities to provide notification to affected customers when adjustments are made to billing cycles which result in a change of nine (9) days or more. Along with the request for variance, Ameren Missouri filed five revised tariff sheets that would implement the "Pick Your Due Date" option for customers.

On June 6, 2019, the Commission issued ORDER ESTABLISHING TIME FOR STAFF TO FILE A RECOMMENDATION ordering Staff to file a recommendation regarding the request for variance and implementing tariff changes, and allowing responses to Ameren Missouri's request from any party, by June 20, 2019. No parties have responded to date.

On June 13, 2019, Ameren Missouri filed a substitute Table of Contents, MO.P.S.C. Schedule No. 6 4th Revised Sheet No. 95.1 to correct a typo in the tariff sheet revision number.

Staff Findings

Ameren Missouri's proposed "Pick Your Due Date" program is a voluntary opt-in program for customers who are not satisfied with the standard billing cycle they are currently served on. A similar program is already available to customers who participate in the Keeping Current Low-Income Pilot Program. The "Pick Your Due Date" option would allow customers to choose the due date of their electric bills which would also result in a change in the customer's billing cycle. Due to potential time constraints and since the change is made at the customer's request,

Ameren Missouri is requesting a waiver from the notice requirement of Commission Rule 4 CSR 240-13.020(6) that states:

...If a utility changes a meter reading route or schedule which results in a change of nine (9) days or more of a billing cycle, notice shall be given to the affected customer at least fifteen (15) days prior to the date the customer receives a bill based on the new cycle.

In Staff's opinion, Ameren Missouri's proposed tariff revision conflicts with Commission Rule 4 CSR 240-13.015(1)(C), that states:

Billing period means a normal usage period of not less than twenty-six (26) nor more than thirty-five (35) days for a monthly billed customer nor more than one hundred (100) days for a quarterly billed customer, except for initial, corrected, or final bills.

In addition, Ameren Missouri filed this case without the requisite public notification of the pending case. Such notification is a requirement when requesting variances from Chapter 13 regulations, with Commission Rule 4 CSR 240-13.065(2) stating:

A utility filing an application for a variance with the commission shall mail, contemporaneously with the filing, copies of the 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 who represented residential customers.

Staff spoke with Ameren Missouri on June 17, 2019, to confirm this requirement was met. The Company had not completed the public notice at this time due to an oversight. On June 19, 2019, Ameren Missouri advised Staff that notification was emailed to the largest newspapers in each county served. While the rule states the notice is to be made by first class mail, email allowed the Company to notify the newspapers in an expedited manner.

Lastly, Commission Rule 4 CSR 240-13.065 (3) states:

Any variance granted by the commission shall be reflected in a tariff.

The tariff sheets filed in Case No. EE-2019-0385 and Tariff Tracking No. YE-2019-0217, do not reflect Ameren Missouri's requested variance from Commission Rule 4 CSR 240-13.020(6) or Commission Rule 4 CSR 240-13.015(1)(C) based on Staff's review.

Staff Recommendation

Staff recommends that Ameren Missouri submit proof of the required notifications to newspapers and parties who represented residential customers in its most recent rate case per Commission Rule 4 CSR 240-13.065(2). Further, Staff recommends that the Commission grant Ameren Missouri a variance from Commission Rule 4 CSR 240-13.020(6) and Commission Rule 4 CSR 240-13.015(1)(C).

If the Commission grants Ameren Missouri variances from Commission Rule 4 CSR 240-13.020(6) and Commission Rule 4 CSR 240-13.015(1)(C), Staff recommends that the Commission reject the tariff sheets filed on June 5, 2019, and as substituted on June 13, 2019, in Case No. EE-2019-0385 and Tariff Tracking No. YE-2019-0217, and order Ameren Missouri to file the same five tariff sheets listed below with the addition of language reflecting the approved variances from Chapter 13.

P.S.C. MO. No. 6

4th Revised Sheet No. 95.1, CANCELLING 3rd Revised Sheet No. 95.1
1st Revised Sheet No. 130, CANCELLING Original Sheet No. 130
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2nd Revised Sheet No. 137, CANCELLING 1st Revised Sheet No. 137
3rd Revised Sheet No. 138, CANCELLING 2nd Revised Sheet No. 138

Staff has verified that Ameren Missouri has filed its annual report, and is not delinquent on its PSC assessment. Staff is not aware of any other matter before the Commission that affects or is affected by this filing.

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) File No. EE-2019-0385
Variance from 4 CSR 240-13.020(6))

AFFIDAVIT OF KIM COX

STATE OF MISSOURI)
) ss.
COUNTY OF COLE)

COMES NOW KIM COX and on her oath declares that she is of sound mind and lawful age; that she contributed to the foregoing *Staff Recommendation* in Memorandum form; and that the same is true and correct according to her best knowledge and belief.

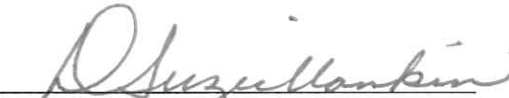
Further the Affiant sayeth not.


_____)
KIM COX

JURAT

Subscribed and sworn before me, a duly constituted and authorized Notary Public, in and for the County of Cole, State of Missouri, at my office in Jefferson City, on this 19th day of June 2019.

D. SUZIE MANKIN
Notary Public - Notary Seal
State of Missouri
Commissioned for Cole County
My Commission Expires: December 12, 2020
Commission Number: 12412070


_____)
Notary Public

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) File No. EE-2019-0385
Variance from 4 CSR 240-13.020(6))

AFFIDAVIT OF BEN RANKIN

STATE OF MISSOURI)
) ss.
COUNTY OF COLE)

COMES NOW BEN RANKIN and on his oath declares that he is of sound mind and lawful age; that he contributed to the foregoing *Staff Recommendation* in Memorandum form; and that the same is true and correct according to his best knowledge and belief.

Further the Affiant sayeth not.

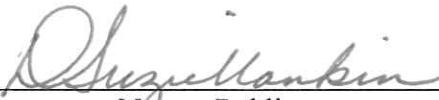


BEN RANKIN

JURAT

Subscribed and sworn before me, a duly constituted and authorized Notary Public, in and for the County of Cole, State of Missouri, at my office in Jefferson City, on this 19th day of June 2019.

D. SUZIE MANKIN Notary Public - Notary Seal State of Missouri Commissioned for Cole County My Commission Expires: December 12, 2020 Commission Number: 12412070
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Notary Public

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In the Matter of Union Electric Company)
d/b/a Ameren Missouri's Request for a) File No. EE-2019-0385
Variance from 4 CSR 240-13.020(6))

AFFIDAVIT OF TAMMY HUBER

STATE OF MISSOURI)
) ss.
COUNTY OF COLE)

COMES NOW TAMMY HUBER and on her oath declares that she is of sound mind and lawful age; that she contributed to the foregoing *Staff Recommendation* in Memorandum form; and that the same is true and correct according to her best knowledge and belief.

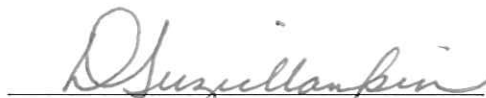
Further the Affiant sayeth not.


TAMMY HUBER

JURAT

Subscribed and sworn before me, a duly constituted and authorized Notary Public, in and for the County of Cole, State of Missouri, at my office in Jefferson City, on this 19th day of June 2019.

D. SUZIE MANKIN
Notary Public - Notary Seal
State of Missouri
Commissioned for Cole County
My Commission Expires: December 12, 2020
Commission Number: 12412070


Notary Public