

**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 Waiver of Various)	Case No. EE-2019-0382
Tariffs and Regulations to Enable the)	
Deployment of Automated Metering)	
Infrastructure Beginning in 2020.)	

**AARP'S APPLICATION TO INTERVENE
AND REQUEST FOR HEARING**

COMES NOW AARP¹, by and through counsel, pursuant to Missouri Public Service Commission ("Commission") Rule 4 CSR 240-2.075, and respectfully requests formal intervention as a party in the above-captioned matter. AARP further requests that a procedural schedule be set in this matter, including the opportunity to present evidence at a formal hearing.

In support of this petition, AARP states as follows:

1. AARP, with its nearly 38 million members in all 50 States and the District of Columbia, Puerto Rico, and U.S. Virgin Islands, is a nonpartisan, nonprofit, nationwide organization that helps people turn their goals and dreams into real possibilities, strengthens communities and fights for the issues that matter most to families such as healthcare, employment and income security, retirement planning, affordable utilities and protection from financial abuse. AARP has over 700,000 members in Missouri, many of whom are residential electric customers of Ameren Missouri.

¹In 1999, the "American Association of Retired Persons" changed its name to simply "AARP", in recognition of the fact that people do not have to be retired to become members.

2. AARP's interest in this matter and its grounds for intervention relate to the consumer protection rules in Chapter 13 that are designed to protect public health and safety. People aged 50 and over are impacted most directly by variations in energy prices. These consumers also devote a higher percentage of their total spending than do other age groups towards residential energy costs ("energy burden"). Many older consumers also have special needs and safety concerns about their access to electric service. Some of these consumers are vulnerable to the risk of serious injury or death if their household is without power and exposed to extreme weather, or if they are without access to medically necessary devices that are electric powered. AARP wishes to ensure that residential energy customers, including those over age 50, are represented by a party that is exclusively looking after their interests.

3. On October 8, 2019, Union Electric Company d/b/a Ameren Missouri ("Ameren Missouri" or "Company") filed a request for waivers from various tariffs and regulations related to Ameren's deployment of automated metering infrastructure (AMI), including a request to ignore the in-person "door knock" safety check that has been the subject of much debate over many previous years at the Commission.

4. Ameren states that as it develops out its AMI network, it would like to have certain variances from consumer protection rules related to Ameren Missouri's desire to include automatic meter shut-off capabilities remotely, rather than using live technicians at the customer premises. The Company claims that it cannot eliminate the technician visit to the premise for a disconnection due to

the Public Service Commission rule, 20 CSR 4240-13.050(9), requiring the company to make an attempt to contact the customer in person at the premise before disconnection. For that reason, Ameren seeks to waive this “door knock” requirement for all customers with AML.

5. These arguments were made repeatedly during a *seven-year* period of Commission workshops and informal collaborations and negotiations that occurred as part of a major revision of Chapter 13 (Residential Billing Rules) that started from at least as early as 2007. AARP was an active participant in those rulemaking discussions. This extended process ultimately resulted in a formal rulemaking (AX-2013-0091), which included public comment from regulated utilities as well as from many public interest groups.

In the 2014 *Order of Rulemaking* of this revision of Chapter 13, the Commission decisively resolved the door knock requirement of and a proposal to eliminate this requirement. The Commission found:

The AARP group, Public Counsel, and Jacqueline Hutchinson strongly urge the commission to keep the door knock requirement in place. They believe a knock on the door will often reveal the presence of some person or circumstance that would make a disconnection of utility service a threat to the health or wellbeing of the resident. For example, the door knock might reveal that a resident has electronic medical equipment in use and would be harmed if service is disconnected.

...

RESPONSE: The commission continues to agree with the consumer groups. The door knock requirement as it currently exists in the rule is a proper balancing of the interest of the safety of utility employees against the need to protect the health and welfare of vulnerable customers. The commission will not change the door knock rule.²

² Case No. AX-2013-0091, Order of Rulemaking, p. 17.

6. Since this matter is of extreme importance to public health and safety, requests an opportunity to learn more about the request and the opportunity for an evidentiary hearing where it can share its concerns and to seek continued protection from the Commission for vulnerable consumers facing disconnection of electric service.

WHEREFORE, AARP respectfully requests formal intervention in this matter for all purposes, and that the Commission order the parties to develop a proposed procedural schedule that includes an evidentiary hearing allowing an opportunity to fully explore the issues presented by the Company's Application.

Dated: October 23, 2019

Respectfully submitted,

/s/ John B. Coffman

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CERTIFICATE OF SERVICE

I hereby certify that copies of the foregoing have been mailed, emailed or hand-delivered to all parties listed on the official service list on this 23rd day of October, 2019.

/s/ John B. Coffman
