

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

In the Matter of Union Electric Company d/b/a)
Ameren Missouri's Requests for a Temporary)
Waiver of Various Tariffs and Commission Order)
to Delay Implementation of Certain Time-of-Use)
Rates and Related Communication Tools for)
Residential Customers, a Permanent Waiver of)
Various Regulations to Cease Printing Beginning)
and Ending Readings on All Residential Customer)
Bills, for Waiver of 60-Day Notice Requirement,)
and for Expedited Treatment)

Case No. EE-2021-0103

STAFF RECOMMENDATION

COMES NOW the Staff of Missouri Public Service Commission, by and through the undersigned counsel, and for its *Staff Recommendation* states as follows:

1. On October 6, 2020, Union Electric Company d/b/a Ameren Missouri ("Ameren Missouri") filed its Notice Of Case Filing, Application For Variances, Motion For Waiver Of 60-Day Notice Requirement, And Motion For Expedited Treatment.

Ameren Missouri made four requests in its filing:

First, the Company requests a temporary waiver from its electric tariffs and a Missouri Public Service Commission ("Commission") Order authorizing it to temporarily delay certain time-of-use ("TOU") rates being offered to or becoming default rates for residential customers for up to five months and to temporarily delay the provision of TOU rate-related communication tools for up to five months. Second, the Company requests from the Commission approval of permanent variances from portions of 20 CSR 4240 Chapter 13 to allow the Company to cease printing beginning and ending readings on all bills for residential customers with Advanced Metering Infrastructure ("AMI") meters. Third, the Company moves for waiver of the 60-day notice requirement under 20 CSR 4240-4.017(1)(D). Fourth, the Company moves for expedited decision from the Commission in accordance with 20 CSR 4240-2.080(14).

2. On October 8, 2020, the Commission, in its Order Directing Notice, Setting Time For Intervention And Responses, And Directing Staff Recommendation, ordered Staff to file a recommendation no later than October 29, 2020.

3. Staff has reviewed Ameren Missouri's filing, and does not oppose the four requests.

4. However, Staff has concerns regarding the ToU and AMI rollout programs and education efforts. As Staff noted in its July 17, 2020 "Response to Status Report," in File No. ER-2019-0335, it continues to have concerns regarding Ameren Missouri's customer education plans and customer engagement plans on the eventual transition to the default Time of Use (TOU) rate, as well as AMI meters. Ameren Missouri filed a responsive pleading on July 21, 2020, noting "Ameren Missouri is also willing to — indeed happy to — provide further information to Staff and all other parties regarding customer engagement plans." Ameren Missouri has not provided further information concerning these plans, and Staff remains concerned that Ameren Missouri's customers do not understand the ToU and AMI rollout programs, and that Ameren Missouri's efforts are not targeted to educate customers as to the impact or purpose of these programs.

5. Customer education, customer understanding, and the accuracy of customer bills are of paramount importance to not only the success of the rollout of the ToU and AMI programs, but also indispensable to Ameren Missouri's obligation to provide reasonable service to its customers. In light of Ameren Missouri's expression of doubt of its ability to provide accurate customer bills at this time, Staff does not oppose the requested waivers and variances.

6. Staff encourages Ameren Missouri to further engage stakeholders regarding concerns that have been raised by customers who have attempted to navigate Ameren Missouri's customer engagement materials, which echo concerns raised by Staff and other stakeholders throughout the meetings scheduled pursuant to the File No. ER-2019-0335, Corrected and Non-Unanimous Stipulation and Agreement, filed February 28, 2020, and approved in the Commission Order Approving Stipulation and Agreements, effective March 28, 2020. Staff also encourages Ameren Missouri to continue efforts into billing system changes that would allow the printing of beginning and ending readings on bills, as the majority of Ameren Missouri customers will be on a ToU plan within the next 5 to 6 years.

7. To effectuate the waiver related to portions of 20 CSR 4240 Chapter 13 to allow the Company to cease printing beginning and ending readings on all bills for residential customers with AMI meters, Ameren Missouri should expeditiously prepare and submit a revised Schedule 6, tariff sheet 131.

WHEREFORE, the Staff prays the Commission accepts its *Staff Recommendation*, grants Ameren Missouri's requested waivers and variances, and grant such other and further relief as the Commission considers just in the circumstances.

Respectfully submitted,

/s/ Nicole Mers

Nicole Mers

Deputy Counsel

Missouri Bar No. 66766

Attorney for the Staff of the

Missouri Public Service Commission

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CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing was served by electronic mail, or First Class United States Postal Mail, postage prepaid, on this 29th day of October 2020, to all counsel of record.

/s/ Nicole Mers

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AFFIDAVIT OF SARAH L.K. LANGE

STATE OF MISSOURI)
) ss.
COUNTY OF COLE)

COMES NOW Sarah L.K. Lange, and on her oath declares that she is of sound mind and lawful age; that she contributed to the foregoing *Staff Recommendation*; and that the same is true and correct according to her best knowledge and belief, under penalty of perjury.

Further the Affiant sayeth not.

/s/ Sarah L.K. Lange
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