

RE: EO-2015-0328

Missouri Public Service Commission
200 Madison Street, PO Box 360
Jefferson City MO 65102-0360

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Missouri Public
Service Commission

January 26, 2016

To the Commission:

I am writing to express my disappointment in your recent decision to allow the customer swap proposed in the above-referenced case involving Ameren and Three Rivers Electric Coop (TREC). There are several homeowners impacted by this decision who had requested a public hearing in order to clarify issues that the PSC has overlooked. I respectfully request that you make certain requirements of the parties prior to the February 5 effective date.

There is no dispute on some issues. Homeowners were notified of this pending action by mail and several attended a meeting hosted by the companies to explain the process. Additionally, as President of the Charleston Place Property Owners Association, I invited an Ameren representative to our annual meeting in October to give additional information.

However, at both meetings, those who attended were told that there would be an opportunity in a later public forum to negotiate the impact of such a decision. We were also told this would take many, many months to resolve. Yet today I find that the matter is resolved, that the comments submitted in good faith have been ignored and that no notice to the parties directly impacted has been undertaken. Given this breakdown, I offer the following additional information:

- **HIGHER RATES--** At the CPPOA meeting, the Ameren representative offered to provide estimates of utility bills for TREC accounts who would be migrated to Ameren. Every one of those estimates was substantially higher. Why would anyone voluntarily pay higher electric rates? Where is the fairness to homeowners who, for no fault of their own, are now suddenly and without consideration, forced to pay more for electricity each month? There is no benefit to these homeowners, only additional cost. Why has this not been addressed?
- **SHIFTING THE RISK--** Certainly the utility companies will benefit from better use of their equipment—no one argues the point. But these are multi-million and multi-billion-dollar enterprises which accepted the risk when this subdivision was developed. It is outrageous that these huge corporations will realize monetary benefits and marginal efficiencies from this action while former TREC customers will only see higher rates. The utilities initially accepted this risk but are now shifting that risk—and the cost—to homeowners who will not be compensated. The Commission should not allow this.
- **STREET LIGHTS--** Additionally, the issue of the subdivision's streetlights has not been settled. Currently, TREC bills CPPOA monthly for street-light power. We call TREC when a light goes out and they make the repair, billing the Association for the bulb. This has been a

beneficial and neighborly solution. However, under the swap, half the street lights are now Ameren units. Ameren tells me that they don't provide this service. The Association will have to hire an electrician and boom truck whenever a light goes out. Our Association is supported with modest annual dues, and there is no way to incorporate this new, higher cost in our current budget. Despite what we were told by Ameren, we don't have time to plan for this. Our FY started January 1.

Also, one existing Ameren unit needs to be made operational. At the time, the Ameren representative promised that they would address this. I'm hoping this is still the case but have nothing in writing. There was also a discussion about the possibility of a joint effort (Ameren/TREC) to help the subdivision retrofit the 20-year-old poles with newer, more efficient lighting which would eliminate some of the maintenance issues. We were hoping that, between the companies, this could be taken care of as part of the swap, a negotiated benefit of the transition and a good-faith response to the concerns of the neighborhood. However, since the PSC has approved the swap without this issue being resolved, the leverage for this environmentally and financially sound improvement has disappeared, and Ameren now has no incentive to negotiate. These matters would have been discussed in a public hearing, which was the expected and appropriate forum.

Therefore, in light of issues that were not known to staff in making its recommendation, I am requesting that the Commission reopen the case and require TREC/Ameren to develop a written transition plan for the accounts impacted by the swap. A special transitional rate for TREC customers moving to the higher-priced Ameren system would be a starting point. There certainly needs to be a resolution of the street light protocol as well.

The Commission deals with many high-profile cases, and you have a difficult task in being fair to all parties. It is my hope that you realize the errors made in this case and provide an opportunity to review your decision.

Sincerely,



Steve Ahrens, President CPPOA
4029 Catalina Drive
Jefferson City MO 65109
(573) 690-6501