

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

In the Matter of Union Electric Company            )  
d/b/a Ameren Missouri's Tariffs to Adjust its        )  
Revenues for Electric Service.                    )        **File No. ER-2021-0240**

**POSITION STATEMENTS OF THE CONSUMERS COUNCIL OF MISSOURI**

The following are position statements of the Consumers Council of Missouri ("Consumers Council" or "CCM"), on remaining contested issues in this electric rate case. Consumers Council reserves the right to modify these position statements, based upon developments at the evidentiary hearing.

22. Class Cost of Service, Revenue Allocation and Rate Design (Electric and Gas)

C. How should any rate increase be allocated to the several customer classes?

**Consumers Council's Position:** The Commission should protect the residential customer class from rate shock. If the agreed upon revenue requirement increase of approximately 8.8% is spread on an equal percentage basis, households using slightly more than the average could be facing a *double-digit increase* in their monthly electric bill. Consumers Council urges the Commission to limit the new burden on residential customer class at no more than a 5% revenue increase. Larger customer classes are already protected by statutory caps on certain electric increases

and they benefit from exemptions that do not apply to residential customers. Ordinary households must rely upon the Commission alone to protect them from an inflationary rate shock as a result of this case.

Respectfully submitted,

/s/ John B. Coffman

---

John B. Coffman                      MBE #36591  
John B. Coffman, LLC  
871 Tuxedo Blvd.  
St. Louis, MO 63119-2044  
Ph: (573) 424-6779  
E-mail: [john@johncoffman.net](mailto:john@johncoffman.net)

Attorney for the Consumers Council of Missouri

Dated: December 7, 2021

## **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 7<sup>th</sup> day of December 2021.

/s/ John B. Coffman

---