

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

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

Initial Brief of the Office of the Public Counsel

COMES NOW the Office of the Public Counsel ("Public Counsel" or "OPC") and offers this initial brief on two issues that remain contested, Issue 22(C), class allocation, and Issue 17, residential rate plan names.

Issue 22(C) How should any rate increase be allocated to the several customer classes?

The Commission should either allocate less than an equal percent share of Ameren's revenue increase to the residential and small business customer classes or allocate Ameren's revenue increase equally among the various rate classes, consistent with the Staff's recommendation.¹ The Midwest Energy Consumer Group ("MECG") and the Missouri Industrial Energy Consumers' ("MIEC") request to allocate greater than an equal percent share of Ameren's large wind farm investments and other large investments onto Missouri's most vulnerable households and small businesses is not in the public interest. Contemporary cost causation principles, the effects of the public health crisis, and high inflation warrant a more thoughtful outcome for Missouri.

Missouri's largest energy consumers have failed to provide persuasive evidence or argument to support a conclusion that they should not pay at least an equal share of Ameren's large plant-in-service accounting ("PISA") investments. The PISA statutes already protect the large power service ("LPS") class, which includes customers MECG/MIEC represent, by capping their PISA impact in a way that will shift PISA costs incurred by the LPS class directly onto all other customer classes once Ameren hits the LPS rate cap.² In other words, the statute already requires all other classes to subsidize PISA costs incurred by the LPS class when Ameren hits a certain level of investment. An additional shift beyond what is contemplated in the statutes is unsupported by the evidence and would result in rates that are not just, reasonable, or in the public interest.

¹ Exhibit (Ex.) 205, Staff Class Cost of Service Study, p.3; Ex. 403, Marke Surrebuttal Testimony, pp. 32-33.

² Section 393.1655.6 RSMo states:

If the difference between (a) the electrical corporation's class average overall rate at any point in time while this section applies to the electrical corporation, and (b) the electrical corporation's class average overall rate as of the date rates are set in the electrical corporation's most recent general rate proceeding concluded prior to the date the electrical corporation gave notice under subsection 5 of section 393.1400, reflects a compound annual growth rate of more than two percent for the large power service rate class, the class average overall rate shall increase by an amount so that the increase shall equal a compound annual growth rate of two percent over such period for such large power service rate class, **with the reduced revenues arising from limiting the large power service class average overall rate increase to two percent to be allocated to all the electrical corporation's other customer classes** through the application of a uniform percentage adjustment to the revenue requirement responsibility of all the other customer classes. [emphasis added].

The only Ameren customers that raised serious concerns with rate affordability are customers in the residential and small business rate classes.³ These customers consistently raised concerns with *any* rate increase due to the COVID-19 pandemic, high inflation, unemployment, and other economic impacts on the smaller classes. While economic downturns impact more than just the smaller rate classes, the public health impacts of raising rates for a service that is necessary for health and survival is unique to the residential class, and to a lesser extent, small businesses. For instance, for a retired elderly residential customer living on a low fixed income such as Social Security, an 8.8% rate increase for a necessary service has a big impact. It forces many individuals to decide on a monthly basis whether to pay their utility bill or buy needed medicine or food. The Commission should consider these serious implications along with principles of cost causation as it decides how to allocate costs.

1. Class Cost Studies

Class cost of service studies are helpful guides in understanding the costs of serving each customer class. No study is perfect, as each study includes inputs, biases, and theories. Some refer to class cost studies as “more of an art than a science.”⁴ In setting just and reasonable rates, the Commission is not

³ Ex. 400, Public Comments; Transcript (Tr.), Volumes 4-10, local public hearings.

⁴ Ex. 215, Lange Rebuttal Testimony, p. 4; (“In the end, cost allocation may be more of an art than a science, since fairness and equity are often in the eye of the beholder.”), *citing* Regulatory Assistance Project’s January 2020 *Electric Cost Allocation for a New Era* (“RAP Manual”), p. 17.

confined by the limits of class cost studies, especially when the health and safety of the public is at stake. However, Public Counsel encourages the Commission to attempt to allocate costs in a manner supported by the class cost studies.

Ameren and the Commission's Staff are the only parties that performed class cost studies for this case.⁵ The two cost studies allocate the majority of costs similarly.⁶ However, the Staff's study provides by far the most granular and thorough class cost study.⁷ The Staff explained why their cost study took into consideration factors that Ameren's cost study failed to consider, most notably how to allocate wind generation costs:

[Staff] attempted to account at least to some level of customer specific infrastructure that is ignored in the Ameren study and we attempted to just apply some basic logic to the consistency of the treatment of generation plant and the revenues that are received from the market value of that energy that is generated. And where that really comes most to light is wind. Under the wind generation, it's effectively all capacity cost. If you effectively allocate the entire cost of the wind using a capacity allocator such as the A&E or any other capacity allocator and you don't really have any energy cost to assign like you would typically have fuel or gas or coal or nuclear fuel with any other type of generating plant, you really are just allocating capacity. If you're just allocating capacity as capacity but then you allocate revenues on energy, you end up with just patently unreasonable mismatch. So that's what I've sought to avoid. There's a number of ways you could seek to avoid it. Under the time that was

⁵ Ex. 215, Lange Rebuttal Testimony, pp. 2-3 ("MIEC relies on Ameren Missouri's study with slight modifications. MECCG's workpapers are somewhat unclear as to whether they directly relied on Ameren Missouri's study or made slight modifications related to production allocation.").

⁶ Tr. 371, testimony of Staff witness Sarah Lange.

⁷ Ex. 205, Staff's Class Cost of Service Study.

available in this case and under the methods available in this case, I think that my approach of generally looking at the renewables on a kWh basis is the more reasonable approach than the Company approach.⁸

Ameren's class cost study is simply not "relevant to Ameren Missouri in the year 2021."⁹ The Staff's approach, however, is consistent with today's electric generation, technologies, and markets. The Staff's approach also helps mitigate the concern with misallocating costs based on outdated methodologies, as explained in the Regulatory Assistance Projects (RAP) January 2020 manual, *Electric Cost Allocation for a New Era*:

Traditional cost allocation techniques classify all utility costs as energy-related, demand-related or customer-related. These categories were always simplifications but they must be reevaluated given new developments. Some legacy cost allocation methods would have treated wind and solar generation entirely as demand-related cost simply because they are capital investments without any variable fuel costs. However, wind and solar generation does not necessarily provide firm capacity at peak times as envisioned by the legacy frameworks, and it displaces the need for fuel supply, so it doesn't fit as a demand-related cost.¹⁰

The below chart from the Staff's class cost study shows the outcome of each of the Staff's various class cost study methodologies.¹¹ The Staff's class cost study employed a variety of methods to identify a range of results, allowing the Staff to compare the reasonableness of its study against multiple methodologies.

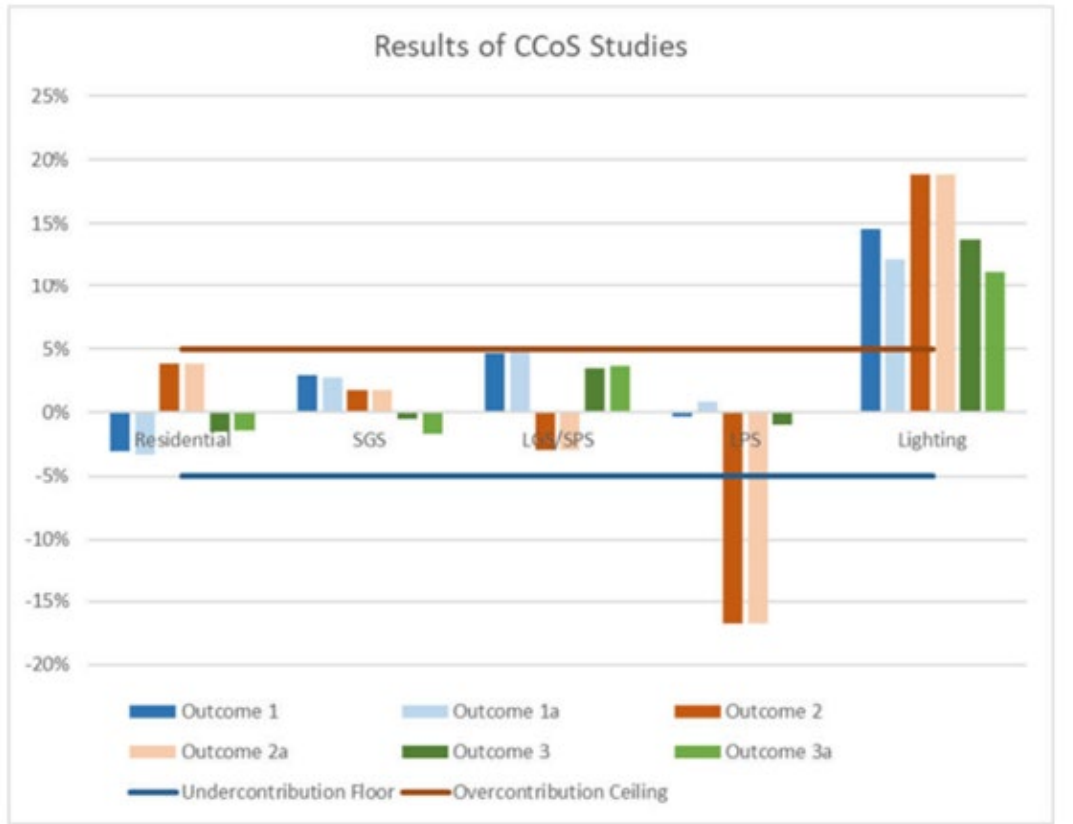
⁸ Tr. 371-372, testimony of Staff witness Sarah Lange.

⁹ Ex. 215, Lange Rebuttal Testimony, pp. 3-4.

¹⁰ *Id.*, pp. 4-5.

¹¹ Ex. 205, Staff Class Cost of Service Study, p. 47.

The Ameren class cost study, on the other hand, used one method developed before the electric system underwent a period of dramatic advancements in technology, policy, and economics that disproportionately allocates less costs to the larger industrial consumers.¹²



Due to the imperfect nature of class cost of service studies, the Staff follows a practice of recommending an equal allocation to classes where the studies show the classes are within five percent (5%) of their class cost. Under all scenarios, the Staff’s studies show the Residential, small general service (SGS), large general service (LGS), and small power service (SPS) classes are within 5%

¹² Ex. 215, Lange Rebuttal Testimony, p. 4.

of their class cost of service, and the Lighting class is overpaying for its service. The results for the LPS class show the LPS class is either under-paying or is within 5% of class cost. The Staff concludes the LPS class “may be under-contributing to Ameren’s return on investment,” and the Lighting class “appears to be over-contributing to Ameren’s return on investment.”¹³

The Staff’s class cost study would support a Commission decision to allocate costs on an equal percentage basis to all classes as recommended by the Staff. The Staff’s study would also support a variety of ranges, including a rate impact of 5% for the residential class and 7.1% for small general service.¹⁴ This result would help mitigate harmful rate impacts while also following a cost-based allocation supported by class cost studies.

Before the Commission orders any allocation of costs, equal or unequal, it is important to understand the impacts such allocations will have on each rate class. This analysis includes consideration of other public interest concerns with allocating costs. Class cost of service “studies serve as a guide to setting rate class revenue requirements and should not be solely relied upon for establishing each class’ revenue requirement because they are not precise, and are not updated for changes from the studied revenue requirement and billing determinants to the ordered revenue requirement and billing determinants.”¹⁵

¹³ Ex. 205, Staff’s Class Cost of Service Study, p. 46.

¹⁴ *Id.*, pp. 44-47.

¹⁵ *Id.*, p. 47.

Other considerations the Commission's Staff indicates the Commission should weigh when allocating class costs include "[p]olicy considerations, such as rate continuity, rate stability, revenue stability, minimization of rate shock to any one-customer class, meeting of incremental costs, and consideration of promotional practices."¹⁶

2. Policy Considerations

The Commission has considerable discretion when allocating costs. *Spire Mo. v. Mo. PSC*, 607 S.W.3d 759, 771 (Mo. App. 2020) ("The Supreme Court has also recognized that issues of cost-allocation...are discretionary determinations frequently delegated to expert administrative agencies like the PSC."). Exercising this discretion in a meaningful way requires a careful analysis of the Ameren and Staff class cost studies and the testimony and argument from the other parties regarding class cost theories and class impact considerations.

The record before the Commission includes important testimony on the state of Missouri's economy, the state of the health of Missouri's populace, and many public comments submitted by residential and small business customers that explain their concerns with a rate increase.

a. COVID-19 / Economy Considerations

The COVID-19 pandemic has impacted all classes and customers to various levels of degree. Consumers Council of Missouri's Executive Director,

¹⁶ *Id.*

Ms. Jacqueline Hutchinson, testified that the COVID-19 pandemic is “still significantly impacting many sectors of the economy” and that a “significant rate increase at this time would increase the threat to the health and safety for many families already struggling to meet their basic needs.”¹⁷ The following staggering statistics exemplify the serious nature of the Commission’s decision on this issue:

Low-income households pay an average of 46% of their gross income towards housing and energy costs. However, households at 50% of the Federal Poverty Guideline may pay up to 54% of their income just on energy. Electric service is essential to public health, particularly during the long recovery from a pandemic.¹⁸

Having to spend half of a household’s income on energy alone is a very concerning statistic, and *any* amount of increase to the residential class will create an additional hardship for these households – from large low-income families to single retirees living on Social Security income alone.

Another consideration Public Counsel urges the Commission to factor into its decision is the fact that inflation is currently at a 30-year high.¹⁹ Some experts have warned “the U.S. may be approaching a period of stagflation...a combination of inflation, slow economic growth and high unemployment.”²⁰ Ameren’s customers are already feeling the effects of this, and rely upon the

¹⁷ Ex. 700, Jacqueline Hutchinson Direct Testimony, p. 4.

¹⁸ *Id.*, p. 6.

¹⁹ Ex. 402, Marke Rebuttal Testimony, p. 12.

²⁰ *Id.*

Commission to recognize these concerns when setting just and reasonable rates that promote the public interest.

This is Ameren’s first general rate case that includes exceptionally large investments in renewable generation resources and distribution infrastructure investments under PISA.²¹ The burden to pay for these large expenditures should not disproportionately hit certain rate classes without indisputable support from the class cost studies and a finding that doing so is otherwise in the public interest. The Commission should make these considerations regardless of whether it shifts more costs to residential, industrial, or any other classes.

b. Public Comments

The residential and small businesses (SGS) classes are the only classes whose customers expressed concerns over their ability to afford a rate increase.²² Several themes appear throughout the comments that are unique to 2021 – ongoing and long lasting impacts from the COVID-19 pandemic, inflation, senior citizens on low fixed incomes, and the current state of the economy. At the end of this brief is Appendix A, which includes a number of public comments that Public Counsel requests the Commission review before issuing its decision. The Commission should consider these comments and the very concerning impacts that a rate increase would have on the small residential and SGS classes when allocating costs among the rate classes.

²¹ § 386.266 RSMo.

Issue 17. A. Should the Company be required to change the names for its TOU rate plans?

All utility service offerings, including Ameren’s Time-of-Use (TOU) rate plans, must be “just and reasonable” and not “subject any particular person...or any particular description of service to any undue or unreasonable prejudice or disadvantage in any respect whatsoever.” § 393.130 RSMo. Ameren markets its rate plans using names different than those listed in its tariff – names that imply customers may experience savings under those plans, when, in fact, the rates could result in higher monthly bills. Because these names could lead to customer confusion, the Commission should order Ameren to market its rate plans under objective names that match the names listed in the company’s tariff.

Rate plan names that imply savings could potentially mislead customers into choosing a rate plan because the name of the plan suggests rate savings that the plan may not achieve for all customers.²³ The Commission Staff’s Class Cost of Service Report explained the Staff’s concern:

Staff is aware that Ameren Missouri has marketed its Residential rate schedule options not under the tariffed names, but rather under promotional names. In general, these names are not descriptive and in and of themselves portray the ToU rate schedules as money-saving opportunities. These names do not indicate the risks of bill increases that are attendant to the optional rates Ameren Missouri promulgated in the last rate case. Staff recommends adoption of more objective or

²² Ex. 400.

²³ Ex. 205, Staff Class Cost of Service Report, p. 53.

informative names for Ameren Missouri’s use in education and promotional materials.²⁴

Ameren has approximately 1,076,972 residential customers,²⁵ and as of the morning of December 9, 2021, the distribution was as follows:²⁶

Residential Tariffed Rate Plan	Marketing Name²⁷	No. Customers
Basic Residential Service (1(M) R-Basic)	Anytime Users	874,950
Daytime/Overnight Service (1(M) R-Daynight)	Evening/Morning Savers	201,474
Smart Saver Service (1(M) R-TOU)	Smart Savers	157
Time-of-Use Service (1(M) R-TOU2)	Overnight Savers	248
Ultimate Saver Service (1(M) R-TOUUS)	Ultimate Savers	143

1. Basic Residential Service / “Anytime Users”

Residential customers without advanced meters receive **Basic Residential Service**.²⁸ This is the only residential rate plan that does not include a time-of-

²⁴ *Id.*

²⁵ Ex. 201, Staff Cost of Service Report, p. 49.

²⁶ Tr. Vol. XI, pp. 294-295, testimony of Ameren witness Steve Wills, providing the number of customers under each advanced meter rate plan. The Residential Basic Service customer number was determined by subtracting Mr. Wills’ updated numbers from the 1,076,972 total customer number provided in Exhibit 201, Staff’s Cost of Service Report, p. 49.

²⁷ Ex. 18, Steve Wills Rebuttal Testimony, p. 48.

²⁸ Union Electric Co., Mo. PSC Schedule No. 6, 4th Revised Sheet No. 54 (“This rate is applicable to all residential customers that are not receiving service either through an advanced meter or under an optional residential rate... For such customers being served through an advanced meter, this rate is applicable until such time that the R-

use or demand rate element. Ameren's "Rate Plan Comparison Online Tool" appears to market this as the "Anytime User" rate plan.²⁹

Potential benefits of this marketing name include that it is descriptive of a rate plan that charges the same rate all day, and by requiring a customer to opt back into a name different from their previous Basic Residential Service plan, it could encourage more customers to study the various plans before making a selection. However, the marketing name could also lead to customer confusion since the marketing name is different from the tariffed rate plan name.

The Commission should order Ameren to reflect the "Anytime Users" marketing name on its tariff so it is easy to match the marketing name with the official tariffed name. In addition, for this rate plan and all rate plans, the Commission should order Ameren and the Commission's complaint department to monitor and immediately report any concerns that develop regarding Ameren's marketing names.

2. Daytime/Overnight Service/"Evening/Morning Savers"

All of Ameren's other residential rate plans charge TOU rates and Ameren markets them as "Savers" plans. When Ameren replaces a residential customer's meter with an advanced meter, the default rate after six months is the Residential Daytime/Overnight Service (1(M) R-Daylight), which Ameren markets as

DAYNIGHT rate becomes applicable by its terms, or at any time as an optional rate at the customer's election.").

²⁹ Ex. 18, Steve Wills Rebuttal Testimony, p. 48.

“Evening/Morning Savers.”³⁰ This plan charges a 9:00 a.m. to 9:00 p.m. daytime rate, and a lower 9:00 p.m. to 9:00 a.m. overnight rate. Ameren replaced the objective tariffed name with a marketing name that implies customer savings.

The Commission should order Ameren to use the “Daytime/Overnight Service” name on its marketing materials, or another objective name, rather than the “Evening/Morning Savers” name that implies savings that may not exist for all customers opting into this plan, and order Ameren to reflect any marketing names in its tariff.

3. Smart Saver Service

The Residential **Smart Saver Service**, or 1(M) R-TOU, charges different peak, off-peak, and intermediate TOU rates; different summer/winter rates; and a summer/winter difference in peak hours.³¹ The Smart Saver name implies savings for customers, and for this reason, the Commission should order Ameren to rename and market this plan using an objective plan name.

4. Time-of-Use Service/“Overnight Savers”

The Residential **Time-of-Use Service**, or 1(M) R-TOU2, charges different peak/off-peak rates, and different summer/winter rates.³² “Peak” is a year-round 6:00 a.m. to 10:00 p.m., and “off-peak” is a year-round 10:00 p.m. to 6:00 a.m. Winter rates are lower than summer rates, and customers have the option

³⁰ *Id.*; Ex. 402, Marke Rebuttal Testimony, p. 14; Tr. 295.

³¹ Union Electric Co., Mo. PSC Schedule No. 6, Original Sheet Nos. 54.7 – 54.9.

³² Union Electric Co., Mo. PSC Schedule No. 6, Original Sheet No. 54.10 – 54.12.

of taking service during the winter under the R-Basic rate. Ameren appears to be marketing this rate plan as its “**Overnight Savers**” plan.³³

This marketing name is somewhat descriptive of a plan with a lower off-peak evening rate; however, other rate plans also include an evening off-peak rate, and this plan would not be a “saver” for all customers. The Commission should order Ameren to market this plan using the tariffed rate name or another objective plan name, and update its tariff to include the marketing name Ameren uses for this rate plan.

5. Ultimate Saver Service

The last residential TOU rate option is the Residential **Ultimate Saver Service**, or 1(M) R-TOUUS.³⁴ Unlike any other residential rate plan, the Ultimate Savers plan includes summer and winter per-kWh “demand charges” in addition to the per-kWh energy charge that varies by peak/off-peak and summer/winter. Ameren markets this plan as its “**Ultimate Saver**” rate, consistent with the tariffed name.³⁵ This plan name raises concerns because it implies the customer would maximize their bill savings, however, due to the varied rate differences and demand charges, this plan could result in a bill increase without

³³ Ex. 18, Steve Wills Rebuttal Testimony, p. 48.

³⁴ Union Electric Co., Mo. PSC Schedule No. 6, Original Sheet No. 54.13 - 54.15.

³⁵ Ex. 18, Steve Wills Rebuttal Testimony, p. 48.

considerable customer education on how to manage usage under this plan.³⁶ The Commission should order Ameren to rename and market this plan using an objective plan name.

6. Conclusion

As demonstrated by the small number of customers opting into a TOU rate, Ameren is in the early stages of its TOU rollout. It is not too late to make changes before the vast majority of customers are eligible to transition to TOU rate plans. The majority of customers have been resistant to Ameren's TOU rate offerings. Specifically, 29,732 residential customers with advanced meters went back to the Basic Residential Service rate and only 548 selected an optional TOU rate plan.³⁷ Objective plan names could help remove the marketing bias from customer choices and lead to a more educated choice by customers.

WHEREFORE, the Office of the Public Counsel respectfully offers this initial brief.

Respectfully submitted,

OFFICE OF THE PUBLIC COUNSEL

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³⁶ One could also argue that the Ultimate Savers name could *deter* customers that associate the word "ultimate" with a higher price similar to how gasoline stations market the highest octane and highest price gas as premium, ultimate, ultra, etc.

³⁷ Tr. Vol. XI, pp. 294-295.

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CERTIFICATE OF SERVICE

I hereby certify that copies of the foregoing were emailed to all counsel of record
this 28th day of December 2021.

/s/ Marc Poston

Appendix A – Public Comments³⁸

- **G.R.** - [Customer] stated they retired & on social security, she is opposed to the rate increase. Said with cost of her medicine, she went in the hole last year & they can't afford an increase for utilities. (Comment P202100649)
- **G.D.** - Customer called stating this is outrageous. She's watching all lights, and cold water wash. She does everything they say to do to save money then they go ahead and do a rate increase. She bought energy saving light bulbs. Her air is set on 79 to save. She's on social security. She's just floored that this would even happen. (Comment P202200045)
- **R.J.** - I believe I speak for others in the same circumstance. My wife and I live on social security and a small veterans disability check. We cannot absorb all the price increases that we are being assaulted with.....we simply can't afford it. While we certainly understand that increased costs to utility companies puts them in the same situation, we pray that compassion will prevail. (Comment P202200046).
- **N.C.** - To whom it may concern, I am writing as a customer of Ameren Missouri both residential and small business owner customer. I am very concerned about Ameren's potential rate increase and ask that it not be approved. We all are in difficult times and many are struggling both as families and small business owners. (Comment P202200049)
- **R.H.** - I received a notice of a proposed rate increase of 11.97% is inflationary and not in the best interest of Ameren customers in Missouri. This increase is outrageous in our current economic environment. Not only is the request unreasonable but also irresponsible and capricious...Any increase in utility costs should be in line with the prevailing cost of living which according to my latest increase in Social Security was about 1.3%. (Comment P202200057)
- **C.W.** - I am a senior living on a fixed income and would love to see my income increase. (Comment P202200067)
- **W.C.** - I am a resident of St. Louis County. I'm hopeful that the people in place to read these comments actually do take them into consideration and make decisions based on public input. It seems these days that no one in public office actually listens to us...Groceries, gasoline, cars, products of all types - all skyrocketing in cost for everyday Missouri residents that

³⁸ Ex. 400, public comments filed in EFIS as of November 9, 2021.

just had to suffer through a pandemic where many of us couldn't work or saw a big reduction in pay. Now inflation is going up and up... (Comment P202200073)

- **R.V.** - Regarding the proposed electric rate increase I am on a fixed income. Medicare goes up every year. Supplemental goes up every year. Car & house insurance goes up every year. Phone bill goes up every year. Electric - sometimes. Food prices are up! Gas is up. But! My Social Security check does not. (Comment P202200079)
- **J.M.** - As a self employed sole business owner, my business is still struggling and recovering from the economic impact of covid during 2020 and 2021. Any increase in expenses is a hardship at this point. Many things have increased such as food, fuel, taxes, supplies; all of us have had to restructure our home and business operating expenses. There are many who are in this same position, I am not alone (Comment P202200107)
- **D.H.** - Customer called stating this is too much with inflation running as high as it is today. Too much to put on the customer. Can accept 5% range, but cannot support 12%. (Comment P202200120)
- **B.H.** - I vote NO for this increase. The cost of living keeps going up but SS doesn't. We are on fixed incomes and keep getting slammed with increases. Can't afford another one. (Comment 202200128)
- **S.G.** - Any additional increase is unconscionable, particularly when people haven't recovered from the pandemic. (Comment 202200135)
- **R.S.** - I am opposed to the \$11.78 dollar increase asked by Ameren Missouri. I am 82 years old & my wife is 76 years old. I am a Navy veteran and both wives retirement & mine do not increase and social security sure doesn't increase that much. (Comment P202200137)
- **T.G.** - This increase will be harmful during this present pandemic economy, especially to us "seniors" who are already trying to conserve in many ways. Please reconsider other options. (Comment P202200141)
- **D.B. & B.B.** - I think you should stop raising your prices every year and start thinking about those who are unable to meet your raised prices. What are some elderly on restricted monies to do or the poorer people as well? They are already skimping on groceries and doctor visits as it is. (Comment P202200148)
- **K.B.** - [Customer] is elderly and on fixed income. She does not want any increase approved at all and believes no increase should be approved during a pandemic. (Comment P202200173)

- **T.M.** - As a 77 year old retired person on a fixed income, I can afford my bills now by careful cash management. With this proposed increase and the new property tax rate increase, next year will be a serious struggle. (Comment P202200175)
- **S.K.** - Now is not the time to raise rates on Ameren customers. The economy is still coming out of Covid. There are still a lot of unemployed people. They do not need this added burden. (Comment P202200184)
- **W.L.** - I am writing to oppose the proposed Ameren rate increase. While investing in renewable energy is an honorable cause, this is not the right time to increase rates. Working families are still struggling to gain stability from the negative effects of this pandemic. Increasing rates will cause an undue burden on families and those with low-incomes and fixed incomes. (Comment P202200188)
- **A.D.** - I am opposed to the rate increase request from Ameren. The utility company must put people first. In the midst of a pandemic and the resulting economic crisis it has caused, Ameren's residential customers—families, seniors, medically vulnerable individuals, and regular citizens trying to survive—cannot afford to pay higher utility bills. The rate hike would have a negative impact on our communities. (Comment P202200192)
- **S.T.** - As a senior citizen on Social Security and already suffering from the County's substantial property tax hike, I may be forced out of my home if service companies are allowed exorbitant rate increases. Two or three percent would be adequate but 12% is greedy and well beyond my means. Shall I be forced to turn off my heat this winter or AC during the hot as hell summers? (Comment P202200202)
- **M.W.** - I am disgusted by the very idea to increase customer rates during these times. My family is having a hard enough time trying to get by due to the pandemic. With the loss of one income already I am doing everything I can to make my electric bill on time each month. What a horrible thing to do to your customers. (Comment P202200221)
- **L.R.** - Good afternoon. The proposed Ameren rate increase is unrealistic—especially to us senior citizens. My income (Social Security, etc.) is certainly NOT increasing 12% annually. With inflation on the rise and daily cost of living on the increase, this IS NOT the time for an increase in utility bills. Spire is, as well, warning about their rates going up. Please consider us during the hearings on the Ameren proposal. Now is not the time to put additional burdens on the senior population. Thank you. (Comment P202200229)

- **T.D.** - The proposed rate hike is unfair and unwarranted! I will be a huge burden to families who are still recovering from Covid unemployment. (Comment P202200240)
- **W.W.** - Ameren Missouri's proposed \$299 million rate-increase will make it harder for the at-risk Veterans we serve to access housing. The proposal would add \$12 every month to the average residential utility bill at a time when 212,842 Ameren Missouri customers are behind on their electric bills.¹ The number of Ameren customers behind on their bills more than doubled at the beginning of the pandemic, from 98,000 in December 2019 to 221,940 by March 2020, and has yet to substantially decrease. People are still feeling the financial pain of the pandemic and Ameren Missouri can do more to help.(Comment P202200245)
- **S.G.** - I was lucky to find a cheaper place to live despite soaring rents and housing costs, nationwide. My last place raised the rent THREE times in TWO years! This story is one that is told over and over, across our city and others. Eviction moratoriums are being lifted even as families are struggling to survive a pandemic (and its inherent healthcare costs), inflation, a precarious economy AND the fact that the cost of natural gas is actually cheaper than ever. So, how is the raising of rates justifiable or humane?! Please don't do this! It will hurt people who are ALREADY HURTING! (Comment P202200248)
- **S.F.** - I can't afford my bills as is. You raise this cost and you're taking a meal out of my mouth. (Comment P202200248)
- **H.L.** - The economy today is poor. People are struggling month to month to make it by. The rates are comparable with other states around us. I am a mother of 2 & can't afford any of my bills to get higher. Every company wants to raise the rate yearly. I don't get enough of a raise from work every year to pay extra for everyone wanting more money. (Comment P202200267)
- **G.M.** - [Customer] is opposed to rate increase, due to the fact that that they had to take a pay decrease due to pandemic (as did others) and can't afford an increase in the rates. (Comment P202200270)
- **V.M.** - People are struggling. Everything is rising in price. Please do not increase prices on this commodity that is necessary for survival! (Comment P202200272)
- **E.I.** - Do not increase our rates. This is a terrible idea after such difficult economic times for the consumer. (Comment P202200274)
- **G.J.** - I am a Senior Citizen who works full time, I'm not old enough for Medicare or full Social Security, so full time work is essential for basic

living. I live in a (1) bedroom apt., who's winter bills top \$100 per month and I'm gone most of the day and live alone...To save a little money I don't use my air conditioning during the summer, so I can eat and buy medicine. Will I have to do the same in the winter, use my car for heat. Like I said I live alone, I really worry about those with struggling families. This increase for me would be a HUGE burden. (Comment P202200275)

- **J.Z.** - Please do not increase our electricity bills. This is a necessity for all. During this pandemic so much has gone up in prices and people are having difficulty making end meet. I am a senior citizen living on Social Security and try to keep my electricity bills as low as possible, but my monthly check will not increase in order to cover this added expense. Ameren has and is doing very well financially and making huge profits since I was born 69 years ago. (Comment P202200282)
- **S.K.** - Inflation has certainly crippled [sic] the buying power of people on a fixed income. Your rate increase request only adds fuel to the fire. Your timing is very untimely. (Comment P202200297)
- **D.M.** - We are all still struggling with last year's shutdown and loss of employment and small businesses. Now is a horrible time to be requesting a rat increase. Low-income single parents and families, the unemployed and senior citizens are struggling to buy food, health insurance, prescription drugs and somehow find enough money for adequate heat in the winter. (Comment P202200299)
- **J.S.** - Where does it leave us - Sr. Citizens on fixed income? Is the cost of living added to our Social Security? - Not so much. Oh, I'm grateful for what I have but fearful of Congress or whomever, want to change Social Security or do away with it. Does anyone really care about us? (Comment P202200300).
- **J.A.** - I am contacting you today regarding the above rate increase, and I urge (and pray fervently) you NOT permit this terrible event. My personal status is that I am 68 years old, retired, on social security and medicate, and have 2 types of cancer...I ask you to not give in to "big money pressure" put on you to permit this cost increase to Missouri residents. I know Ameren always states on the commercials to "turn down your thermostat to save on the cost of electricity." Well, I doubt that any of the panel members have there's set at 66 degrees and wear a jacket inside every day during the cold temperatures like I do. (Comment P202200308)
- **R.B.** - He is on Social Security with very limited funds available. He states that the little raise he will receive on his S.S. check will be eliminated by an Ameren rate increase. (Comment P202200309)

- **C.R.** - He opposes the increase & would like the PSC to deny any increase in rates. He thinks the timing is really bad with Covid & the economy and people still struggling. (Comment P202200310)
- **J.A.** - While I acknowledge the possible need to raise rates by Ameren, my objection is the amount that they are asking. It's going to put a lot of undue stress on lower and middle income families that are already struggling just to survive. Especially with COVID and unemployment taking such a toll on the people of Missouri as well as our economy. They are asking for too much. Just my two cents. (Comment P202200319)
- **R.J.** - Please, vote this increase down! Any more increase during this pandemic will make people like me on a low income have to choose between this and buying food & medicine. Please vote this down! (Comment P202200327)
- **M.Y.** - As a senior citizen on a fixed income, I vehemently oppose any rate increases in this utility. I am very frugal in my lifestyle already and cannot endure these incessant price demands for fuel adjustment clauses in my electric bill...I request that this rate increase be denied. (Comment P202200331)
- **L.S.** - Linda Schwarz opposes the Ameren Missouri rate increase. She believes rates are already too high & Ameren should not be asking for a rate increase during a pandemic. (Comment P202200340)