

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

In the Matter of Union Electric Company d/b/a Ameren
Missouri's Filing to Change Criteria for Assessment of
New Customer Deposits.

)
) **File No. ET-2014-0076**
) Tariff No. YE-2014-0245

**CONSUMER COUNCIL'S RESPONSE TO STAFF RECOMMENDATION
AND REQUEST FOR HEARING**

COMES NOW the Consumers Council of Missouri ("Consumers Council" or "CCM"), pursuant to the Public Service Commission's ("Commission's") Order Establishing Time To Respond to Staff Recommendation and Rule 4 CSR 240-2.110, and states as follows:

1. On March 7, 2014, the Staff of the Commission ("Staff") filed a Recommendation, recommending that the Commission approve the proposed tariff filed by Union Electric Company d/b/a Ameren Missouri ("Ameren Missouri" or "Company") in this case, which would allow the utility to use credit scoring terms (established by a financial institution not regulated by this Commission) in order to determine when to assess a deposit to new customers.

2. Last year, the Commission issued an Order of Rulemaking, changing Rule 4 CSR 240-13.030 to eliminate the consumer protection of "prima facie" means of establishing credit for new consumers (except for consumers with no credit history). This change will become effective on March 30, 2014. The elimination of this consumer protection will expose many new consumers to the possibility of a deposit requirement, heightening the significance of the Company's request to use credit scoring in this case.

3. All of the parties to this case have been engaged in negotiations in an effort to reach a settlement on terms that would allow Company to utilize credit scoring under certain conditions. Consumers Council does not believe that the proposed tariff as written, nor the Staff Recommendation, would adequately protect new consumers. Consumers Council remains concerned that the tariff as written would not give the Commission proper oversight over the terms of establishing credit for this purpose.

4. Consumers Council is hopeful that negotiations may yet provide the opportunity to resolve this case without the need for a hearing, but requests that the Commission set a date for hearing so that contested issues may be resolved by the Commission if in fact a unanimous stipulation cannot be reached.

Respectfully submitted,

/s/ John B. Coffman

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Attorney for Consumers Council

Dated: March 14, 2014

CERTIFICATE OF SERVICE

I hereby certify that copies of the foregoing have been mailed, emailed or hand-delivered to official service list on this 14th day of March, 2014.

/s/ John B. Coffman
