

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

In the Matter of Union Electric Company)
d/b/a Ameren Missouri's Application for)
Approval of Revised Tariff Sheet Nos.)
54,54.4, & 54.7 to Continue to Default)
Certain Residential Customers to the)
Evening/Morning Savers Rate Plan,)
Motion for Waiver of 60-Day Notice)
Requirement, Motion for Expedited)
Treatment, and if Expedited Treatment)
Not Granted, Alternative Motion for)
Approval of Substitute Revised Tariff)
Sheets to Delay Defaulting Certain)
Residential Customers to Smart Savers)
Rate Plan Beyond March 31, 2024.)

Case No. ET-2024-0156

APPLICATION TO INTERVENE
OF THE CONSUMERS COUNCIL OF MISSOURI

COMES NOW the Consumers Council of Missouri (“Consumers Council” or “CCM”), by and through counsel, pursuant to Commission Rule 20 CSR 4240-2.075, and respectfully applies for intervention as a party in this electric rate case, initiated by Union Electric Company d/b/a Ameren Missouri (“Company”) on November 3, 2024.

In support of this application, Consumers Council states as follows:

1. Consumers Council is a nonpartisan, nonprofit corporation that is dedicated to educating and empowering consumers statewide and to advocating for their interests. Consumers Council of Missouri was originally founded in 1971 as Utility Consumers Council of Missouri, and has participated in numerous

cases at the Missouri Public Service Commission, including the previous Ameren Missouri electric rate case.

2. Correspondence, communications, orders and the decision in this matter should be addressed to:

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3. Consumers Council's interest in this matter relates to the rates, terms and conditions of service for the Company's residential electric customers, including low-income and vulnerable customers. This interest is different than the general public interest.

Specifically, Consumers Council's interest in this case is the protection of *consumer choice* for residential electric consumers upon terms that are just, reasonable and fair. Consumers Council's interest is unique in its exclusive focus on residential consumers, including low-income and vulnerable consumers, and it believes that its intervention in these cases would be in the public interest.

4. Consumers Council supports time-of-use ("TOU") rate structures only when such rate plans are *optional*. Ideally, we believe that residential electric consumers should never be switched to any TOU rate plan without affirmatively making that choice (i.e., opting-in).

5. Consumers Council is generally supportive of the Company's "First Request"¹ to modify the default plan for placing new customers starting March

¹ Ameren Missouri's Application in this case, pp. 11-17.

31. 2024 so that the default is that new customers are still placed on the Evening/Morning Savers plan, rather than being placed on the so-called “Smart Savers” plan which has a steeper differential.

6. However, Consumers Council also supports the November 9, 2024 procedural recommendation of the Commission Staff (“Staff”) in this matter, recommending that the proposed tariffs be suspended to allow for full due process and consideration of “all relevant factors” as required by Missouri law.²

WHEREFORE, Consumers Council respectfully requests formal intervention in this matter for all purposes.

Respectfully submitted,

Dated: November 10, 2024

/s/ John B. Coffman

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² State ex rel. Utility Consumers Council of Missouri, Inc. v. Public Service Commission, 585 S.W.2d 51-58 (Mo. banc 1979) (“UCCM”).

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 10th day of November, 2024.

/s/ John B. Coffman
