BEFORE THE PUBLIC SERVICE COMMISSION OF THE STATE OF MISSOURI

Dranel J. Clark and Aquilla Canada,)
Complainants,)
v.	File No. EC-2024-0111
Union Electric Company d/b/a Ameren Missouri,)
Respondent.)

RESPONSE TO STAFF ERRATA SHEET

COMES NOW Union Electric Company d/b/a Ameren Missouri ("Ameren Missouri") and for its *Response to Staff Errata Sheet* respectfully states the following to the Missouri Public Service Commission ("Commission"):

- 1. On May 24, 2024, Staff filed its Errata Sheet to revise its Staff Recommendation to find that Ameren Missouri "...violated the Stipulation and Agreement in EE-2019-03821 in which the parties agreed to an 'enhanced disconnection notice communications schedule' as part of the agreement for a variance from 20 CSR 4240-13.050(9), 20 CSR 4240-13.055(3)(C) and 20 CSR 4240-13.055(3)(D)."
- 2. On April 19, 2024, Staff issued DR 0013 to Ameren Missouri. Ameren Missouri did not become aware of an error in the Staff Recommendation until it was preparing its response to Staff DR 0013.
- 3. Ameren Missouri believes that Staff misinterpreted the information provided in the contact log in response to Staff DR 0001 to come to its conclusion that **

 ** Attached and labeled as Attachment

A are the relevant contacts from Ameren Missouri's response to DR 0001 regarding **

the entry that Ameren Missouri believes the Staff misinterpreted as a **

4. In response to DR 0013, Ameren Missouri provided information to Staff that the

**

** Ameren Missouri first notified Staff of the system issue on March 9, 2022, stating:

It was discovered that with a system production change on 02/23/22, the outbound call system logic was not set to include a second call attempt when an answering machine was reached on the first call; this is being addressed with the vendor and we are currently working with them on a fix. We do expect this system issue to be resolved by the end of the week.

The automated call system issue was resolved in March 2022.

5. If the Commission determines that a violation of the Stipulation and Agreement in EE-2019-03821 occurred, Ameren Missouri requests the Commission also determine that the violation involving the automated call system has been corrected.

6.	Ameren	Missouri	is	agreeable	to	**
		**				

WHEREFORE, Ameren Missouri submits this *Response to Staff Errata Sheet* and requests the Commission find Ameren Missouri has satisfactorily resolved the violation stated in the Staff Errata Sheet.

Respectfully submitted,

/s/ Jennifer L. Hernandez

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ATTORNEY FOR UNION ELECTRIC COMPANY d/b/a AMEREN MISSOURI

CERTIFICATE OF SERVICE

I hereby certify that copies of the foregoing have been emailed to the parties of record on this 3^{rd} day of June 2024.

/s/ Jennifer L. Hernandez

ATTACHMENT A

IS CONFIDENTIAL IN ITS ENTIRETY

PURSUANT TO 20 CSR 4240-2.135(2)(A)1