

**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.) **Case No. ER-2024-0319**

APPLICATION TO INTERVENE OF AARP

COMES NOW **AARP**, 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 (“Ameren Missouri” or “Company”).

In support of this application, AARP states as follows:

1. AARP¹, is a nonpartisan, nonprofit, nationwide organization that helps people turn their goals and dreams into real possibilities, strengthens communities and fights for the issues that matter most to families such as healthcare, employment and income security, retirement planning, affordable utilities and protection from financial abuse. AARP has over 700,000 members in Missouri, many of whom are residential electric customers of the Applicant Company.

2. AARP promotes the well-being of older persons through advocacy, education, and service on a number of priority issues. AARP advocates for fair and affordable utility rates and services for persons over 50. Older customers are particularly

¹ In 1999, the “American Association of Retired Persons” changed its name to simply “AARP” (not an acronym), in recognition of the fact that people do not have to be retired to become members.

vulnerable to increases in energy prices. They also devote a higher percentage of their total spending on residential energy costs than do other age groups.

3. AARP's interest in this matter relates to how the proposed rate increase may impact those older Missouri customers who are currently receiving electric service from Ameren Missouri. AARP is concerned about how decisions made in this case may impact the rates, terms and conditions of service for the Company's residential electric customers, including older residential customers. This interest is different than the general public interest.

4. AARP has been an active participant in several previous and ongoing cases at the Missouri Public Service Commission ("Commission"), including being an intervenor in previous electric rate cases filed by Ameren Missouri.

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

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6. AARP wishes to explore the utility's proposals further, because the monopoly utility rates imposed in this case as a party with discovery rights. AARP is opposed to any unjust and unreasonable revenue requirement, as well as being opposed to any discriminatory rate design for the utility's residential electric customers.

7. With regard to rate design, AARP is generally opposed to mandatory time-of-use rate plans; we prefer that such rate plans be "opt-in".

8. Consumers Council also favors a residential rate design that keeps fixed monthly charges low, by applying the majority of any necessary rate increase to the usage components of residential bills, which helps give customers more control over their electric bills.

9. AARP reserves the right to provide the Commission with more detailed positions in this rate case, following discovery and further review.

10. AARP believes that its intervention and participation in this proceeding would serve the public interest, and it wishes to become a party to this case for all purposes.

WHEREFORE, **AARP** respectfully requests that the Commission grant this Application to Intervene, entitling it to fully participate in this proceeding.

Respectfully submitted,

/s/ John B. Coffman

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Attorney for AARP

Dated: July 17, 2024

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 17th day of July 2024.

/s/ John B. Coffman
