

**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) Case No. ER-2024-0319
Revenues for Electric Service)

**RESPONSE TO ORDER SETTING TIME FOR RESPONSES TO PROPOSED LOCAL
PUBLIC HEARINGS AND SETTING A DEADLINE FOR ANY PROPOSED
LANGUAGE FOR LOCAL PUBLIC HEARING NOTICES**

Comes now the Office of the Public Counsel (the “OPC”) and in response to the Public Service Commission of the State of Missouri’s (the “Commission”) Order Setting Time for Responses to Proposed Local Public Hearings and Setting a Deadline for Any Proposed Language for Local Public Hearing Notices (the “Order,” Doc. 57) respectfully states:

1. On June 28, 2024, Union Electric Company d/b/a Ameren Missouri (“Ameren”) filed this case, seeking an increase of approximately \$446.2 million, or approximately 15.49% in its overall revenue requirement. (Wood Direct Test. 3, Doc. 13).
2. Ameren estimates that the proposed increase for the average residential customer will be approximately 15.77%, or \$17.45 per month. (Meyer Direct Test., Schedule AMM-D1 1, Doc. 12).
3. On September 13, 2024, as a part of the Order, the Commission proposed four (4) in-person and two (2) virtual local public hearings. The locations for the in-person local public hearings include: (1) Cape Girardeau; (2) Jefferson City, (3) St. Charles, and (4) St. Louis. (Order 1). The Commission proposes to hold the St. Charles and St. Louis in-person hearings on the same day. (*Id.*).
4. In the Order, the Commission stated that “parties may file any comment, objections, or recommendations about local public hearings” no later than September 20, 2024. (Order 2).

5. Given the vast nature of Ameren’s service area, the socio-economic status of many whom it serves, and the large increase Ameren seeks in this case, the OPC requests that the Commission hold at least three (3) additional in-person local public hearings.
6. Specifically, to ensure that customers residing in the northwestern and northern sections of Ameren’s service territory have the opportunity to attend a local public hearing within a reasonable driving distance of their home, the OPC recommends that the Commission hold an in-person local public hearing in Kirksville¹ and in either Kearney or Kingston.²

Kirksville TCRC 315 South Franklin Street Kirksville, MO 63501	Church of the Annunciation Community Center 705 N. Jefferson St. Kearney, MO 64060
-or-	-or-

¹ Google Maps identifies the drive from Kirksville, MO to the Governor’s Office Building in Jefferson City as approximately 1 hour and 56 minutes. See Google Maps, https://www.google.com/maps/dir/Kirksville,+MO+63501/200+Madison+Street,+Jefferson+City,+MO/@39.3795701,-93.553665,8z/data=!3m1!4b1!4m13!4m12!1m5!1m1!1s0x87e811e640bb0023:0x74ae9d94e382d102!2m2!1d-92.5832496!2d40.1947539!1m5!1m1!1s0x87db5e4439896b0d:0xba5c54a8bfadd789!2m2!1d-92.170341!2d38.5769532?entry=tu&g_ep=EgoyMDI0MDkxNS4wIKXMDSOASAFAw%3D%3D. Similarly, it states that the drive from Kirksville, MO to the next closest suggested local public hearing in St. Charles County is approximately 2 hours and 59 minutes. See Google Maps, https://www.google.com/maps/dir/Kirksville,+MO+63501/St+Charles+County+Executive+Office+Building,+100+N+3rd+St,+St+Charles,+MO+63301/@39.476121,-92.8524496,8z/data=!3m1!4b1!4m13!4m12!1m5!1m1!1s0x87e811e640bb0023:0x74ae9d94e382d102!2m2!1d-92.5832496!2d40.1947539!1m5!1m1!1s0x87df2fac05fb3b93:0x889f97f05a6b7615!2m2!1d-90.4829506!2d38.7822895?entry=tu&g_ep=EgoyMDI0MDkxNS4wIKXMDSOASAFAw%3D%3D.

² Google Maps identifies the drive from Kearney, MO to the Governor’s Office Building in Jefferson City as approximately 2 hours and 40 minutes. See Google Maps, https://www.google.com/maps/dir/Kearney,+MO/200+Madison+Street,+Jefferson+City,+MO/@39.0086433,-93.9946386,9z/data=!3m1!4b1!4m13!4m12!1m5!1m1!1s0x87c1ad0114d0db87:0xb834553d8f514901!2m2!1d-94.3621703!2d39.3677802!1m5!1m1!1s0x87db5e4439896b0d:0xba5c54a8bfadd789!2m2!1d-92.170341!2d38.5769532?entry=tu&g_ep=EgoyMDI0MDkxNS4wIKXMDSOASAFAw%3D%3D. Similarly, the drive from Kingston, MO to the Governor’s Office Building in Jefferson City is approximately 2 hours and 35 minutes. See Google Maps, https://www.google.com/maps/dir/Kingston,+MO/200+Madison+Street,+Jefferson+City,+MO/@39.3342002,-93.7203459,9z/data=!4m13!4m12!1m5!1m1!1s0x87c1ea480ce239af:0xcbc6beed74c88705!2m2!1d-94.0385517!2d39.6441742!1m5!1m1!1s0x87db5e4439896b0d:0xba5c54a8bfadd789!2m2!1d-92.170341!2d38.5769532?entry=tu&g_ep=EgoyMDI0MDkxNS4wIKXMDSOASAFAw%3D%3D.

Truman State University Student Union Activities Room 901 S. Franklin Kirksville, MO 63501	Caldwell County Courthouse—2nd Floor 49 East Main Kingston, MO 64650
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7. Further, recognizing that a majority of Ameren’s residential customers reside in the St. Louis area and that the Commission has suggested that the local public hearings in this area occur on a single day, the OPC also recommends that the Commission hold at least one (1) additional local public hearing in that area on a different day than those suggested in the Order. This will ensure that customers who cannot attend the currently suggested in-person hearings due to a conflict on the Commission’s chosen day have an opportunity to attend an in-person hearing within a reasonable driving distance of their home. Therefore, the OPC recommends that the Commission hold this additional local public hearing at either or both of the following locations:

Sunset Hills City Hall Council Chambers 3939 Lindbergh Blvd. St. Louis, MO 63127	Harris Stowe State University 3026 Laclede St. Louis, MO 63103
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WHEREFORE, the Office of the Public Counsel submits this Response to the Commission’s Order and recommends that the Commission hold at least three (3) more in-person local public hearings in addition to those it has suggested in the Order, as specified above.

Respectfully submitted,

/s/ Lindsay VanGerpen
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CERTIFICATE OF SERVICE

I hereby certify that copies of the forgoing have been mailed, emailed, or hand-delivered to all counsel of record this 20th day of September 2024.

/s/ Lindsay VanGerpen