

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

**AMEREN MISSOURI’S RESPONSE TO OTHER PARTIES’ FILINGS SEEKING  
ADDITIONAL LOCAL PUBLIC HEARINGS**

**COMES NOW** Union Electric Company d/b/a Ameren Missouri (“Company” or “Ameren Missouri”) and, pursuant to 20 CSR 4240-2.080(13), hereby responds to filings made by Renew Missouri/Consumers Council of Missouri, the Office of the Public Counsel, and Sierra Club (collectively, the “Other Parties”), all of which ask the Commission to add additional local public hearings beyond the six local public hearings the Commission recommended in its *Order Setting Time for Responses to Proposed Local Public Hearings and Setting a Deadline for any Proposed Language for Local Public Hearing Notice* (the “Order”), as follows:

1.       The Order recommends in-person local public hearings in all major regions of the Company’s service territory, in eastern Missouri (St. Charles and St. Louis), in southeast Missouri (Cape Girardeau), and in Central Missouri (Jefferson City).<sup>1</sup> Additionally, the Order recommends two virtual local public hearings which allow participation by customers residing anywhere in the state. The Order’s recommendation matches the number and type of local public hearings conducted in the Company’s previous electric rate case, File No. ER-2022-0337.

2.       The Other Parties seek to increase the number of local public hearings by 50%, from six to nine, largely fixating on driving distance but ignoring that in 2024, potential

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<sup>1</sup> While not a major region of the Company’s service territory, the Company serves about 15,000 customers in northwest Missouri. Historic attendance and local public hearings there has been very poor. For example, the last time a local public hearing was held in that area (in Kearney) in 2017 (File No. ER-2016-0179), just two persons attended at all – none testified.

participants can and routinely do use Zoom, Web-Ex, Teams and other similar platforms to meet and confer on a variety of issues. Moreover, the history associated with local public hearing participation in Company rate cases over the past several years, coupled with the availability of participation opportunities via virtual public hearings, strongly mitigate against the need to hold additional local public hearings.

3. Actual attendance figures demonstrate that four in-person and two virtual local public hearings constitute a reasonable and sufficient number of local public hearings.

4. The statistics from File No. ER-2022-0337 (four in-person; two virtual) are as follows:

Date	Location	Type	Attendees	Testifying Witnesses
2/1/2023	Jefferson City	In-Person	3	2
2/2/2023	Web-Ex	Virtual	17	0
2/3/2023	Web-Ex	Virtual	29	9
2/9/2023	St. Charles	In-Person	28	14
2/9/2023	St. Louis	In-Person	39	25
2/23/2023	Cape Girardeau	In-Person	4	2

While two of the in-person local public hearings were relatively well attended, so too were the virtual local public hearings.

5. In File No. ER-2021-0240 (five virtual), the attendance was as follows:

Date	Location	Type	Attendees	Testifying Witnesses
10/4/2021	Web-Ex	Virtual	56	0

10/5/2021	Web-Ex	Virtual	13 <sup>2</sup>	0
10/6/2021	Web-Ex	Virtual	12	1
10/7/2021	Web-Ex	Virtual	7	4
10/8/2021	Web-Ex	Virtual	12	0

6. In the Company’s last pre-pandemic electric rate case (File No. ER-2019-0335), when the Commission last held nine local public hearings (all in-person), attendance was as follows, with all but one hearing producing testimony from 5 persons or less (and several with either 1 or no testifying witnesses at all):

Date	Location	Type	Attendees	Testifying Witnesses
1/6/2020	Arnold	In-person	10	1
1/7/2020	Ferguson	In-person	30	3
1/13/2020	Kirksville	In-person	10	1
1/14/2020	O-Fallon	In-person	4	0
1/15/2020	Cape Girardeau	In-person	1	0
1/16/2020	S. Stl. County	In-person	30	12
1/16/2020	St. Louis	In-person	14	5
1/21/2020	Jefferson City	In-person	2	1

7. While the above figures cannot “prove” what the precise optimal mix and number of local public hearings should be, they do not suggest that more local public hearings produce more testimony or that more local public hearings are needed. In the Company’s last case where

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<sup>2</sup> The Attendees figures for this and the next three local public hearings reflect the number of persons asking a question during the question-and-answer session and not necessarily the number of persons who joined the Web-Ex.

the Commission held a total of six local public hearings, as it proposes here, 51 witnesses testified. By contrast, in the 2019 case where nine local public hearings were held, the total was just 23.

8. In the Company's last rate case, File No. ER-2022-0337, some of the same Other Parties also sought additional local public hearings, a request the Commission rejected. In this case, they have presented no evidence, other than an apparent preference for "more is always better," that would support a departure from the Commission's decision in that case to hold exactly the same number of hearings in that case that the Commission proposes to hold in this case.<sup>3</sup>

**WHEREFORE**, the Company respectfully requests that the Commission deny the Other Parties' request for three additional local public hearings.

Respectfully submitted,

/s/ James B. Lowery

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<sup>3</sup> As the Staff and the Company indicated in opposition to holding nine local public hearings in the last rate case, there would also be severe logistical challenges for the Commission and the parties to hold seven live plus two virtual local public hearings over the short span of time practically available under the Procedural Order, given other important Procedural Order milestones that the parties must meet, especially the Company, which must address testimony on every issue from every party.

## **CERTIFICATE OF SERVICE**

I hereby certify that copies of the foregoing have been mailed, hand-delivered, or transmitted by facsimile or electronic mail to counsel of record as reflected on the certified service list maintained by the Commission in its Electronic Filing Information System on this 26th day of September 2024.

**/s/ James B. Lowery**