

Exhibit No.:
Issue(s): Chapter 13 Related Tariff
Changes, Paperless
Billing Tariff Changes
Witness: Contessa King
Sponsoring Party: MoPSC Staff
Type of Exhibit: Rebuttal Testimony
Case No.: ER-2024-0319
Date Testimony Prepared: January 17, 2025

MISSOURI PUBLIC SERVICE COMMISSION

FINANCIAL AND BUSINESS ANALYSIS DIVISION

CUSTOMER EXPERINCE DEPARTMENT

REBUTTAL TESTIMONY

OF

CONTESSA KING

**UNION ELECTRIC COMPANY,
d/b/a Ameren Missouri**

CASE NO. ER-2024-0319

*Jefferson City, Missouri
January 2025*

Rebuttal Testimony of
Contessa King

1 A. Yes, Staff reviewed proposed tariff changes associated with Public Service
2 Commission 4240 Chapter 13 - *Service and Billing Practices for Residential Customers of*
3 *Electric, Gas, Sewer, and Water Utilities (“Chapter 13”).*

4 Q. Please list the proposed changes that you reviewed.

5 A. Staff examined proposed changes to *Sheet No. 139 – VI. Deposit Practices, A.*
6 *Residential Customers, I.c., Sheet No. 143 – VII. Disconnection and Reconnection of Service,*
7 *B. Notice of Intent to Disconnect Residential Service, B.2 and B.3., Sheet No. 145 - VII.*
8 *Disconnection and Reconnection of Service, G. Avoidance of Disconnection of Service, and*
9 *Sheet No. 162 – F. Voluntary Electronic Bill Rendering and Payment Program.*

10 Q. Did Staff issue discovery requests to Ameren Missouri for additional
11 information regarding the proposed Chapter 13 related tariff changes?

12 A. Yes. Staff submitted three Data Requests (“DR”) to learn more about
13 modifications to the aforementioned tariff sections.

14 Q. Based on Staff’s analysis of the proposed tariff changes, does Staff recommend
15 that the Commission approve Ameren Missouri’s proposed tariff changes?

16 A. Yes, in part. Staff recommends approval of each Chapter 13 related tariff change
17 listed above with the exception of Sheet No. 143, section *VII. Disconnection and Reconnection*
18 *of Service, B. Notice of Intent to Disconnect Residential Service, B.2,*¹ which pertains to a utility
19 company’s responsibility, under state law, to notify occupants of a single-metered
20 multi-dwelling of their right to initiate a receivership procedure.

¹ Proposed tariff changes on MO PSC Schedule 6, 3rd Revised Sheet No. 143, *VII. Disconnection and Reconnection of Service (Cont’d), B. Notice of Intent to Disconnect Residential Service, B.2 and B.3.*

Rebuttal Testimony of
Contessa King

1 Q. Please explain Ameren Missouri's proposed changes to Sheet No. 143, B.2 and
2 explain why Staff recommends rejecting the proposed language.

3 A. Ameren requested the removal of language from Section *VII.B.2 of the General*
4 *Rules and Regulations* regarding notifying occupants of their right to initiate a receivership
5 procedure in certain situations involving disconnection of electric service. Ameren Missouri
6 was under the impression that the existing tariff language is outdated.² In Staff DR 0554
7 (Schedule CK-r2) Staff questioned Ameren Missouri's conclusion that the existing receivership
8 language is outdated given such notification is pursuant to state law, section 441.650, RSMo,
9 as cited in Commission rule 20 CSR 4240-13.050 Discontinuance of Service (7)(A).
10 Ameren Missouri responded that those conducting the tariff review were unaware of the notice
11 requirement and Ameren Missouri agrees that the currently effective tariff language
12 should remain.

13 Q. Based on your previous answer, it appears that Ameren Missouri agrees that
14 Sheet No. 143, B.2 should not be changed, is that correct?

15 A. Yes. Per Ameren Missouri's response to Staff DR 0554, it agrees that the current
16 tariff language on Sheet No. 143, B.2 should remain; however, since the proposed language is
17 still before the Commission as part of this rate case, Staff also recommends that the Commission
18 reject the proposed language as submitted with this case. Staff will ensure that the proposed
19 language is not inadvertently submitted by Ameren Missouri during compliance tariff review.

20 Q. Does this conclude your rebuttal testimony?

21 A. Yes, it does.

² ER-2024-0319, Direct Testimony of Michael W. Harding, page 5, lines 18-22.

Contessa King
Customer Experience Department
Financial and Business Analysis Division

Professional Experience:

*Regulatory Compliance Manager, Financial and Business Analysis Division & Staff Division
(November 2017-present)*

Outreach and Diversity Officer, Administration (2015-2017)

Consumer Outreach Coordinator, Administration (2013-2015)

Utility Policy Analyst I, Operations (2012-2013)

Consumer Services Coordinator/Assistant Manager, Administration & Staff Counsel (2007-2012)

Consumer Services Specialist II, Administration (2005-2007)

Senior Office Support Assistant, Adjudication (2002-2005)

Missouri Secretary of State's Office, Corporations Unit (2000-2002)

KMIZ TV - FOX 11, Benedek Broadcasting Company (1994-2000)

I graduated from the University of Missouri-Columbia with a Bachelor of General Studies (a multidisciplinary degree) areas of study: Communications, Mass Communications and Humanities. In October 2011, I attended the Center for Public Utilities regulatory training at New Mexico State University, and in November 2024, I completed the Customer Experience Program at Lindenwood University, Professional and Continuing Education (PACE). Additionally, I serve on the Advisory Board of the Customer Experience Program at Lindenwood University.

Participant in the first, second, and fourth partnership exchange between the Commission and the National Energy Regulatory Agency of Moldova (ANRE), traveled to Chisinau, Moldova June 2010. Contributions include a two-part presentation on consumer affairs, trained ANRE delegates, assisted with the re-engineering of the Commission's Electronic Filing Information System (EFIS) capability, developed a new workflow procedure for ANRE's petitions/complaints process and assisted with partnership coordination efforts. Partnership supported by National Association of Regulatory Utility Commissioners (NARUC) and the United States Agency for International Development (USAID).

Selected to participate in a partnership exchange between NARUC and the Nigerian Electric Regulatory Commission (NERC); traveled to Abuja, Nigeria October 2012 (partnership exchange supported by USAID). Invited to participate in a partnership exchange between NARUC and the Kenya Energy Regulatory Commission (ERC); traveled to Nairobi, Kenya May 2016 (partnership exchange supported by USAID and Power Africa).

In November 2023, I contributed to the USAID-NARUC Central Asia Energy Regulatory Partnership U.S. Study Tour on Regulatory Governance Program Visit to Missouri.

Contessa King
Case Participation

Case Participation:

The following is a listing of cases before the Commission in which I provided testimony, Staff recommendation(s) or significant analysis:

Case Number	Company Name – Type of Case	Contribution
AO-2021-0264	Cause of the February 2021 Cold Weather Event and its Impact on Investor Owned Utilities	Staff Report
AW-2020-0356	Working Case to Consider Best Practices for Recovery of Past-Due Utility Customer Payments After the Covid-19 Pandemic Emergency	Staff Report
AW-2020-0148	Working Case to Reconsider a Proposed Residential Customer Disconnection Data Reporting Rule	Analysis
AW-2017-0336	General Review of Commission Rules	Analysis
AW-2018-0393	Working Case for the Writing of a New Rule on the Treatment of Customer Information by Regulated Utilities and Their Affiliates and Nonaffiliates	Analysis
AW-2011-0252	Working File to Consider Changes to Chapter 13 Service and Billing Practice Rules	Analysis
AX-2023-0175	Proposed Rulemaking to Promulgate a New Rule Regarding a Residential Customer Disconnection Data Reporting Rule	Staff Comments and Testimony
AX-2020-0076	Proposed Rule Regarding the Treatment of Customer Information by Commission Regulated Utilities	Analysis
AX-2018-0395	Proposed Revisions to Improve the Commission’s Rules (Chapter 13 Rules)	Staff Comments and Staff Memorandum
AX-2013-0091	Proposed Rulemaking to Amend 4 CSR 240-13 Service and Billing Practices for Residential Customers	Analysis
AX-2010-0061	Public Counsel’s Petition for Promulgation of Rules Relating to Billing and Payment Standards for Residential Customers	Analysis
CA-2013-0271	New Horizons Communications Corp. - Application for Certificate	Staff Recommendation
CA-2013-0492	Giant Communications, Inc. - Application for Certificate	Staff Recommendation
CA-2013-0548	FidelityLink, LLC - Application for Certificate	Staff Recommendation
CO-2014-0025	Metropolitan Telecommunications of Missouri, Inc. – Application to Expand Certificate of Basic Local Service Authority	Staff Recommendation
EC-2024-0092	Staff of the Missouri Public Service Commission vs. Evergy Metro, Inc d/b/a Evergy Missouri Metro and Evergy Missouri West, Inc d/b/a Evergy Missouri West	Analysis

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Case Participation

Case Number	Company Name – Type of Case	Contribution
EC-2019-0168	Jill Covington Beatty v. Ameren Missouri -Complaint Case	Staff Report and Testimony
EC-2018-0113	Anthony R. Granillo v. Ameren Missouri -Complaint Case	Analysis
EE-2022-0071	Evergy Metro, Inc. d/b/a Evergy Missouri Metro and Evergy Missouri West, Inc. d/b/a Evergy Missouri West Request for a Waiver of Various Tariffs and Regulations Related to Automated Metering Infrastructure (AMI)	Analysis
EE-2019-0382	Ameren Missouri’s Request for a Waiver to Various Tariffs and Regulation to Enable the Deployment of Automated Metering Infrastructure (AMI) Beginning in 2020	Analysis
EM-2018-0012	Application of Great Plains Energy Incorporated for Approval of its Merger with Westar Energy, Inc.	Analysis
EO-2021-0361	In the Matter of the Cause of the February 2021 Cold Weather Event and its Impact on The Empire District Electric Company d/b/a Liberty	Staff Report
EO-2021-0360	In the Matter of the Cause of the February 2021 Cold Weather Event and its Impact on Evergy Missouri Metro, Inc. d/b/a Evergy Missouri Metro	Staff Report
EO-2021-0359	In the Matter of the Cause of the February 2021 Cold Weather Event and its Impact on Evergy Missouri West, Inc. d/b/a Evergy Missouri West	Staff Report
EO-2021-0358	In the Matter of the Cause of the February 2021 Cold Weather Event and its Impact on Union Electric Company, Inc. d/b/a Ameren Missouri	Staff Report
EO-2021-0032	An Agreement Between Evergy, Inc., and Elliott Management, Inc.	Staff Report
EO-2019-0132 EO-2019-0133	Kansas City Power & Light Company's Notice of Intent to File an Application for Authority to Establish a Demand-Side Programs Investment Mechanism	Analysis
EO-2015-0055	Ameren Missouri’s 2nd Filing to Implement Regulatory Changes in Furtherance of Energy Efficiency as Allowed by MEEIA - Flex Pay Application Filed 11/30/2017	Analysis
ER-2024-0319	In the Matter of Union Electric Company d/b/a Ameren Missouri’s Tariffs to Adjust Its Revenues for Electric Service	Rebuttal Testimony
ER-2024-0189	In the Matter of Evergy Missouri West, Inc. d/b/a Evergy Missouri West’s Request for Authority to Implement a General Rate Increase for Electric Service	Direct Testimony

**Contessa King
Case Participation**

Case Number	Company Name – Type of Case	Contribution
ER-2022-0337	In the Matter of Union Electric Company d/b/a Ameren Missouri's Tariffs to Adjust Its Revenues for Electric Service	Direct – Class Cost of Service, Surrebuttal
ER-2022-0129	Evergy Metro, Inc. d/b/a Evergy Missouri Metro - General Rate Increase	Rebuttal Testimony
ER-2022-0130	Evergy Missouri West, Inc. d/b/a Evergy Missouri West - General Rate Increase	Rebuttal Testimony
ER-2021-0312	The Empire District Electric Company d/b/a Liberty – General Rate Case	Direct – Cost of Service Staff Report, Rebuttal
ER-2019-0335	Union Electric Company d/b/a Ameren Missouri – General Rate Case	Direct – Class Cost of Service Staff Report, Rebuttal
ER-2018-0145	Kansas City Power & Light Company - General Rate Case	Direct – Cost of Service Staff Report
ER-2018-0146	KCP&L Greater Missouri Operations Company - General Rate Case	Direct – Cost of Service Staff Report
ER-2012-0174	Kansas City Power & Light Company - General Rate Case	Direct, Rebuttal, Surrebuttal
ER-2012-0175	KCP&L Greater Missouri Operations Company - General Rate Case	Direct, Rebuttal, Surrebuttal
ET-2024-0061	In the Matter of the Joint Application of Evergy Metro, Inc. d/b/a Evergy Missouri Metro and Evergy Missouri West, Inc. d/b/a Evergy Missouri West for Approval of Tariff Revisions to TOU Program	Staff's Interim Recommendation, Staff's Second Interim Recommendation
ET-2021-0082	Union Electric Company d/b/a Ameren Missouri for Approval of its Surge Protection Program	Staff Report
EW-2023-0199	Collaborative Workshop for Customer Education and Outreach Regarding the Introduction of Default Time-of-Use Rates by Evergy Missouri	Staff Comments Analysis
EW-2013-0045 GW-2013-0046 WW-2013-0047	Working Case (Consolidated) to Consider the Establishment of a Low-Income Customer Class or Other Means to Help Make Utility Services Affordable	Analysis
GC-2020-0057	William L. Hackney & Catrina Hackney v. Spire – Complaint Case	Analysis
GC-2018-0377	Imri Meiron v. Spire - Complaint Case	Analysis
GC-2018-0159	Lisa Lambert v. Spire - Complaint Case	Analysis
GC-2013-0361	William Wehrle v. Laclede Gas Company – Complaint Case	Analysis
GC-2006-0318	Staff v. Laclede Gas Company - Complaint Case	Analysis

**Contessa King
Case Participation**

Case Number	Company Name – Type of Case	Contribution
GO-2022-0022	Staff's Investigation of Spire STL Pipeline's Application at FERC for a Temporary Certificate to Operate	Staff Report
GO-2021-0367	In the Matter of the Cause of the February 2021 Cold Weather Event and its Impact on Summit Natural Gas of Missouri, Inc.	Staff Report
GO-2021-0366	In the Matter of the Cause of the February 2021 Cold Weather Event and its Impact on Liberty Utilities (Midstates Natural Gas) Corp. d/b/a Liberty	Staff Report
GO-2021-0365	In the Matter of the Cause of the February 2021 Cold Weather Event and its Impact on The Empire District Gas Company, d/b/a/ Liberty	Staff Report
GO-2021-0364	In the Matter of the Cause of the February 2021 Cold Weather Event and its Impact on Spire Missouri, Inc. d/b/a Spire Missouri East	Staff Report
GO-2021-0363	In the Matter of the Cause of the February 2021 Cold Weather Event and its Impact on Spire Missouri, Inc. d/b/a Spire Missouri West	Staff Report
GO-2021-0362	In the Matter of the Cause of the February 2021 Cold Weather Event and its Impact on Union Electric Company, Inc. d/b/a Ameren Missouri	Staff Report
GO-2018-0251	Investigation of Customer Service Issues at Spire Missouri, Inc.	Staff Report
GO-2018-0195	Investigation into the Interruption Of Summit's Gas Deliveries in the Lebanon, Missouri Region	Analysis
GR-2021-0320	The Empire District Gas Company d/b/a Liberty – General Rate Case	Direct – Cost of Service
GR-2018-0013	Liberty Utilities (Misstates Natural Gas) Corp. d/b/a Liberty Utilities – General Rate Case	Analysis
OX-2025-0106	Proposed Rule 20 CSR 4240-10.175 Relating to Customer Information of Electrical Corporations, Gas Corporations, Heating Companies, Certain Water Corporations and Certain Sewer Corporations	Staff Comments
TA-2013-0363	Matrix Telecom, Inc. d/b/a VarTec Telecom – Application for Certificate	Staff Recommendation
TA-2013-0364	Matrix Telecom, Inc. d/b/a Excel Telecommunications – Application for Certificate	Staff Recommendation
TA-2013-0464	TNCI Operating Company LLC – Application for Certificate	Staff Recommendation
TA-2014-0083	Angel Americas, LLC – Application for Certificate	Staff Recommendation
TD-2013-0275	360networks (USA), Inc. - Cancellation of Certificate of Service Authority	Staff Recommendation

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Case Participation**

Case Number	Company Name – Type of Case	Contribution
TD-2013-0276	AboveNet Communications, Inc. - Cancellation of Certificate of Service Authority	Staff Recommendation
WC-2019-0324	Cordney Jack Travis v. Missouri-American Water Company – Complaint Case	Analysis
WC-2006-0345	Dione C. Joyner v. Missouri-American Water Company - Complaint Case	Staff Recommendation
WR-2018-0170 SR-2018-0171	Liberty Utilities (Missouri Water) - Small Utility Rate Case	Analysis

Ameren Missouri's
Response to MPSC Data Request - MPSC
ER-2024-0319

In the Matter of Union Electric Company d/b/a Ameren Missouri's Tariffs to Adjust Its Revenues
for Electric Service

No.: MPSC 0554

Ameren Missouri proposes removing what it states is outdated language on tariff sheet 143. On page 5, starting on line 16, Ameren witness Michael Harding supports removing language which informs occupants of their right to initiate a receivership in certain situations. It is Staff's understanding that Chapter 13.050(7)(A) requires such notification pursuant to state law, section 441.650, RSMO. Please provide a detailed explanation on why the Company believes the receivership language is outdated and should be removed. Please include written documentation, reference other rules and other resources that may support your detailed explanation. Requested by Contessa King Contessa.king@psc.mo.gov <<mailto:Contessa.king@psc.mo.gov>>

RESPONSE

Prepared By: Aubrey Krcmar
Title: Regulatory Liaison
Date: 10/21/24

During our tariff review, it was determined that situations where a Single Metered Multi-Dwelling Unit Residential Building or Individually Metered Multi-Dwelling Unit Residential Building were subject to disconnection are very rare. However, those conducting the review were unaware of the notice requirement in subsection 2 of Section 441.650. Given that requirement, the Company agrees the tariff language should remain