

Exhibit No.:
Issue(s): AMI Opt-out
Witness: Coty L King
Sponsoring Party: MoPSC Staff
Type of Exhibit: Rebuttal Testimony
Case No.: ER-2024-0319
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MISSOURI PUBLIC SERVICE COMMISSION

INDUSTRY ANALYSIS DIVISION

ENGINEERING ANALYSIS DEPARTMENT

REBUTTAL TESTIMONY

OF

COTY L KING

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

CASE NO. ER-2024-0319

*Jefferson City, Missouri
January 2025*

1 **REBUTTAL TESTIMONY**

2 **OF**

3 **COTY L KING**

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

6 **CASE NO. ER-2024-0319**

7 Q. Please state your name and business address.

8 A. My name is Coty L. King, and my business address is Missouri Public Service
9 Commission, P. O. Box 360, Jefferson City, Missouri, 65102.

10 Q. By whom are you employed and in what capacity?

11 A. I am employed by the Missouri Public Service Commission (“Commission”) as
12 a Senior Compliance Analyst in the Engineering Analysis Department, Industry
13 Analysis Division.

14 Q. Please describe your work and educational background.

15 A. A copy of my work and educational experience is attached to this testimony as
16 schedule CLK-r1.

17 Q. What is the purpose of your rebuttal testimony?

18 A. The purpose of my rebuttal testimony is to respond to the direct testimony of
19 Ameren Missouri witness Michael W. Harding regarding its non-standard metering provisions.¹

20 Q. Did Staff propose changes to Ameren Missouri’s non-standard metering charge
21 or tariff in its direct testimony?

22 A. No. Staff is not opposed to Ameren Missouri’s current non-standard metering
23 charge or tariff. However, the Commission recently approved a stipulation and agreement in

¹ Direct Testimony of Michael W. Harding page 4 line 19

1 the Evergy Missouri West rate case that will provide a self-read option for customers requesting
2 a non-standard meter.² Staff's direct testimony in this case was filed prior to the
3 Agenda discussion that approved the unanimous stipulation and agreement in ER-2024-0189.

4 **REMOTE METERING**

5 Q Please briefly describe Ameren Missouri's current remote meter reading opt-out
6 provisions of its tariff.

7 A. Ameren Missouri's remote meter reading opt-out provision currently allows
8 residential customers the option of opting out of the installation of remotely read metering or
9 requesting the removal of previously installed remotely read metering.³ In such instances,
10 non-standard metering equipment will be installed that requires a manual meter read. Customers
11 requesting non-standard metering service will be charged a one-time setup charge and a
12 monthly recurring Non-Standard Meter Charge.⁴

13 Q. Please briefly describe Ameren Missouri's proposed changes to its remote meter
14 reading opt-out provisions.

15 A. Ameren Missouri proposes to clarify that remote meter reading opt-out is not
16 available for residential customers that are receiving service under any of the following rates:
17 1) any residential rate option other than Anytime Service, 2) Electric Power Purchases from
18 Qualifying Facilities, or 3) Electric Power Purchases from Qualified Net Metering Facilities.
19 These customers would pay an initial one-time meter setup fee of \$100 and a \$40 monthly
20 non-standard meter read charge.

² Evergy Missouri West Unanimous Stipulation and Agreement 10-2-2024 Page 8 Section 11, Case No. ER-2024-0189

³ Union Electric Company Electric Service MO.P.S.C. SCHEDULE NO. 6 3rd Revised SHEET NO. 129

⁴ Union Electric Company Electric Service MO.P.S.C. SCHEDULE NO. 6 2nd Revised SHEET NO. 129

1 Q. Do other utilities allow customers to opt-out of advanced meters?

2 A. Yes. Several electric and water utilities regulated by this Commission allow
3 customers to opt-out of advanced meters. The table below is a non-exhaustive summary of other
4 advanced meter opt-out rates:

5

| Utility | One-time fee | Monthly fee | Tariff Reference | Effective Date | Case |
|------------------------------------|--------------|--------------------------------------|--|------------------------|-------------------------------|
| Evergy Missouri West | \$150 | \$45 | Sheet R-33.2 | 12/06/ 2018 | JE-2020-0046 |
| Spire Missouri Inc | \$100 | \$30 | Sheet 19.2 | 12/23/2021 | YG-2022-0162 |
| Empire District Electric | \$150 | \$45 \$10 (for additional meters) | Section 5, Sheet 11 & Section 3, Sheet 5 | 8/17/2020 9/16/2020 | ER-2019-0374, AO-2020-0237 |
| Empire Water | \$150 | \$45 \$10 (for additional meters) | Section 2, Sheet 6; Section 1, Sheet 3 | 10/11/2020 | AO-2020-0237 |
| Liberty Utilities (Missouri Water) | \$150 | \$45 \$10 (for additional meters) | Sheet 5, Sheet 20 | 9/10/2020 | AO-2020-0237 |

6 Note: Empire District Electric, Empire District Water, & Liberty Water tariffs include an additional
7 option of disabling two-way communications. Also, a customer who opts out prior to installation
8 is not assessed the one-time fee. Evergy Missouri West offers a self-read option.

9 Q. What is the one time set up charge?

10 A. Opt-out customers will be assessed a one-time set up charge for the installation
11 of the non-standard metering equipment.

12 Q. What is the cost incurred by Ameren Missouri to send a meter-reader to the
13 domicile of an Advanced Metering Infrastructure (“AMI”) opt-out Customer?

14 A. According to Ameren Missouri the current cost per hour is \$52.50.⁵

15 Q. Is Ameren Missouri opposed to having opt-out customers self-report?

⁵ Discovery Request: OPC-OPC 2015

1 A. Yes, according to OPC’s discovery request 2019 Ameren is opposed to having
2 customers self-read as Ameren Missouri’s justification for its investment in AMI metering
3 included the benefit of operational efficiencies. In other words, the reduction of costs related to
4 meter reading. Ameren Missouri further states, in part that “the addition of the unnecessary and
5 redundant business processes that would be needed to accommodate individual customer
6 preferences in how their meters function would inherently undermine the operational
7 efficiencies of AMI.”

8 **SELF-READ**

9 Q. Is Ameren Missouri or any other party proposing a self-read option?

10 A. No, neither Ameren Missouri nor any other party has proposed a self-read
11 option in this rate case.

12 Q. Do any other companies allow for self-read options for AMI-opt out customers?

13 A. Yes, as noted above, Evergy Missouri West allows the self-read option for
14 AMI opt-out customers.⁶

15 Q. How does Evergy Missouri West’s self-read option work?

16 A. Evergy Missouri West’s self-read option is designed to allow the customers to
17 self-report the usage each month with Evergy Missouri West verifying the readings on a
18 semiannual basis. Specifically, Evergy Missouri West’s self-read option states:

19 The Residential Customer shall accurately read and timely report the energy
20 usage monthly. If the Customer fails to provide the meter-reading on time, the
21 Company shall estimate the Customer's energy usage for that month. At least
22 twice a year, at the beginning and end of the summer billing months, the
23 Company shall obtain an actual meter reading of the Customer's energy usage
24 in order to verify the accuracy of readings reported in this manner.

⁶ Evergy Missouri West Unanimous Stipulation and Agreement 10-2-2024 Page 8 Section 11, Case No. ER-2024-0189

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1 If the Customer does not read and report their meter for two (2) consecutive
2 months or any three (3) months in a rolling twelve-month period, the Company
3 may resume monthly readings of the meter.
4

5 Q. Has the Commission expressed support for a self-read option for remote meter
6 reading opt-out customers?

7 A. Yes. The Commission expressed support for the self-read option offered by
8 Evergy Missouri West in its Agenda discussion on December 4, 2024.

9 Q. What is Staff's position on a self-read option?

10 A. Staff is not opposed to Ameren Missouri's current non-standard metering
11 provisions. Additionally, Staff is not opposed to Ameren Missouri offering a self-read option
12 provided certain conditions are included. Offering a self-read option to customers who want to
13 opt-out of remote meter reading is beneficial to customers in that it will allow them to avoid a
14 reoccurring monthly fee. However, certain rate options require an advanced meter.
15 Additionally, any provision for self-reads should include a provision for the utility to return to
16 monthly reads, and charge for those monthly reads, if a customer fails to provide accurate and
17 timely self-reads.

18 Q. Does this conclude your rebuttal testimony?

19 A. Yes, it does.

Coty L. King

Present Position:

I am a Senior Compliance Analyst in the Engineering Analysis Department, of the Industry Analysis Division of the Missouri Public Service Commission.

Educational Background and Work Experience:

I received my Bachelor of Business Administration from the University of Excelsior in 2023. I served in the United States Army as a Heavy Equipment Supervisory from 2008 through 2021. I have been employed by the Commission since 2023.

Case History:

| Case Number | Utility | Type | Issue |
|--------------|----------------------|----------|---|
| GO-2023-0432 | Spire | Gas | Infrastructure System Replacement Surcharge |
| E0-2024-0161 | Evergy Missouri West | Electric | Change of Supplier |
| EO-2024-0281 | Ameren | Electric | Vegetation Management Standards Variance |
| EO-2024-0297 | Liberty (Empire) | Electric | RES Compliance Plan |
| EC-2024-0372 | Ameren | Electric | Complaint |
| ER-2024-0189 | Evergy | Electric | Rate Case |