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Witness: Aubrey Krcmar
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Sponsoring Party: Union Electric Company
File No.: ER-2024-0319
Date Testimony Prepared: January 7, 2025

MISSOURI PUBLIC SERVICE COMMISSION

FILE NO. ER-2024-0319

**REBUTTAL TESTIMONY
OF
AUBREY KRCMAR
ON
BEHALF OF
UNION ELECTRIC COMPANY
D/B/A AMEREN MISSOURI**

**St. Louis, Missouri
January 2025**

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REBUTTAL TESTIMONY

OF

AUBREY KRCMAR

FILE NO. ER-2024-0319

I. INTRODUCTION

1

Q. Please state your name and business address.

2

3 A. My name is Aubrey M. Krcmar. My business address is 101 Madison St.,
4 Jefferson City, Missouri.

Q. By whom are you employed and what is your position?

5

6 A. I am employed by Ameren Missouri as Regulatory Liaison.

**Q. Please describe your educational background and employment
8 experience.**

7

9 A. I have a bachelor's degree in business administration from Columbia
10 College. I served for four years in the United States Navy before joining Ameren Missouri
11 in January 2001 as a Customer Service Representative/Customer Care Advisor in the
12 Jefferson City Customer Care Center. I spent 17 years in the Call Center, also serving in
13 an administrative support role, before promotion to a Call Center Supervisor which was
14 my position for five years. In this role, I managed a team of up to 20 Customer Care
15 Advisors. In January 2018, I transferred to my current role within Regulatory Affairs.

Q. What are your responsibilities in your current position?

16

17 A. In my current position, I am responsible for maintaining a comprehensive
18 understanding of company business practices as well as applicable regulations and
19 standards to ensure compliance with company tariffs and MPSC guidelines. I collaborate
20 with cross-functional teams to develop and execute regulatory compliance strategies.

1 Another of my key responsibilities is the investigation and handling of formal MPSC
2 customer complaints against Ameren Missouri, serving as a company witness when
3 required. As regulatory liaison, I keep MPSC Staff apprised of any customer issues that
4 may be of concern, as well as work internally within the company to investigate and/or
5 resolve any concerns shared by Staff.

6 **Q. To what testimony or issues are you responding?**

7 A. My rebuttal testimony responds to Office of Public Counsel (“OPC”) witness
8 Dr. Geoff Marke’s direct testimony related to Ameren Missouri’s Property Management Portal,
9 and OPC witness Lena Mantle’s direct testimony describing her experience with choosing an
10 energy rate for her personal account. I am also including a response to direct testimony filed by
11 Staff witness Sarah Fontaine.

12 **II. RESPONSE TO OPC WITNESS MARKE’S PROPERTY MANAGEMENT**
13 **PORTAL TESTIMONY**

14 **Q. Can you explain the benefits of Ameren Missouri’s Property**
15 **Management Portal?**

16 A. The Property Management online portal offers features to make doing
17 business easier. This online service is available to property managers, landlords, property
18 owners, and realtors. Through the portal, property managers can:

- 19 • Add locations using a physical address
- 20 • Add multiple locations at one time
- 21 • View, add, and remove locations
- 22 • Enter multiple email addresses for notifications
- 23 • Schedule electric and natural gas turn-on/off dates to coincide with lease
- 24 dates

- 1 • Receive emails when turn-on orders are issued or voided, a shut-off for
- 2 nonpayment order is issued, and the name is changed on an account
- 3 • View and download reports
- 4 • Turn on service to a property in landlord's name
- 5 • Issue turn-on and turn-off orders for a tenant

6 The portal provides a convenient and simpler way for property owners/managers to
7 ensure services are on when they should be and helps prevent the need for multiple phone
8 calls to the Call Center. With online access, enrollees can manage their properties at the
9 time which best suits them versus making multiple phone calls during normal business
10 hours. Additionally, property owners enrolled in the portal are notified when service is on
11 or off in their properties; this awareness can prevent potential property damage due to
12 service being off during cold weather (i.e. frozen pipes).

13 **Q. Can you explain the current security measures in place for users of the**
14 **Property Management Portal?**

15 A. Ameren Missouri Property Management Portal users must agree to the
16 Terms and Conditions, which includes a statement that "Access to any of this information
17 by Property Owner/Manager is pursuant to, and conditioned upon, each such tenant
18 executing a utility Addendum to Lease, which shall be made available to Property
19 Owner/Manager by Ameren Corporation." This addendum is provided in the online portal,
20 but the functionality does not currently exist within the portal for the storage of completed
21 addendums.

22 **Q. Does Ameren Missouri have any plans to strengthen the security**
23 **posture of the Property Management Portal?**

1 A. Yes. Ameren has plans to execute a Property Management Portal
2 Modernization capital project in 2025, which we expect to be in-service by 12/31/25. This
3 portal modernization project will strengthen the security posture by implementing a role-
4 based authorization flow that will require an Ameren administrator to approve (and/or
5 reject) all portal end users. Once the project commences, we plan to ensure that appropriate
6 authentication, authorization and audit flows/mechanisms are in place to confirm the
7 safety, privacy, and security of our customers. We will also be exploring options to verify
8 that portal users own the properties for which they access account information from the
9 portal or have a property management agreement with the owners of said properties. With
10 the Property Management Portal in place today, the functionality does not exist for the
11 storing of Tenant Lease Addendums. However, with our Property Management Portal
12 Modernization project scheduled for 2025, we will be exploring options to maintain
13 additional records, including the Tenant Lease Addendums.

14 **Q. Was the tragic incident involving a customer shooting referenced in Dr.**
15 **Marke’s testimony related to Ameren Missouri’s customer information policies?**

16 A. No. ** _____
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16 **Q. Are there policies in place today which could have helped prevent the**
17 **service from being set up in the incorrect name at the address?**

18 A. Yes. In 2016, our customer policies did allow for the secondary account
19 holder to set up new service for the primary account holder if they could verify the last 4
20 digits of the SSN on file. In January 2020, we implemented a new Customer Contact Policy.
21 The policy dictates that Ameren Missouri coworkers cannot communicate with a third
22 party regarding a customer's account unless that third party has been designated by the
23 primary customer of record as an authorized account contact. Customers can add

1 “authorized contacts” by calling the Customer Care Center or online at
2 AmerenMissouri.com. Only a customer of record can add an authorized user to their
3 account. Authorized account contacts can make certain changes to an account but are
4 restricted from adding or removing other authorized users; adding, removing, or changing
5 an account password; and connecting new service for the customer of record. This policy
6 ensures that customer information is appropriately safeguarded and further protects our
7 customers from the risk of utility fraud.

8 **III. RESPONSE TO OPC WITNESS MANTLE’S RATE CHANGE**
9 **TESTIMONY**

10 **Q. What processes are in place for AMI (“smart meter”) customers to opt-**
11 **out of the default Evening/Morning Saver TOU rate?**

12 A. Ameren Missouri has several processes in place for AMI (“smart meter”)
13 customers to opt-out of the default Evening/Morning Saver TOU rate. Once customers
14 receive communication advising that the rate change is upcoming as per the six-month
15 tariff default, they can request to remain on the basic Anytime User rate by calling, self-
16 serving through our website or mobile app, or by returning a postcard.

17 **Q. Are you aware of any issues that would have caused a delay in**
18 **processing customer requests to opt out of the default Evening/Morning Savers Time**
19 **of Use (TOU) rate, as described in the direct testimony of OPC Senior Analyst Lena**
20 **Mantle?**

21 A. Yes. In September 2024, it was discovered that approximately 3,000
22 customers from April-August 2024 had mailed a postcard in to request to remain on the
23 Anytime User rate and this postcard request wasn’t processed. The impact analysis and
24 correction to those accounts is as follows:

1 The decision was made to not debit accounts, only credit accounts for any
2 difference between the Evening/Morning Saver and Anytime User rates.

3 There was a total of 308 accounts that were billed more on the Evening/Morning
4 Saver rate than they would have been on Anytime User.

5 The total credit amount was \$537.35, with the lowest credit \$1.00 and the highest
6 credit \$7.66.

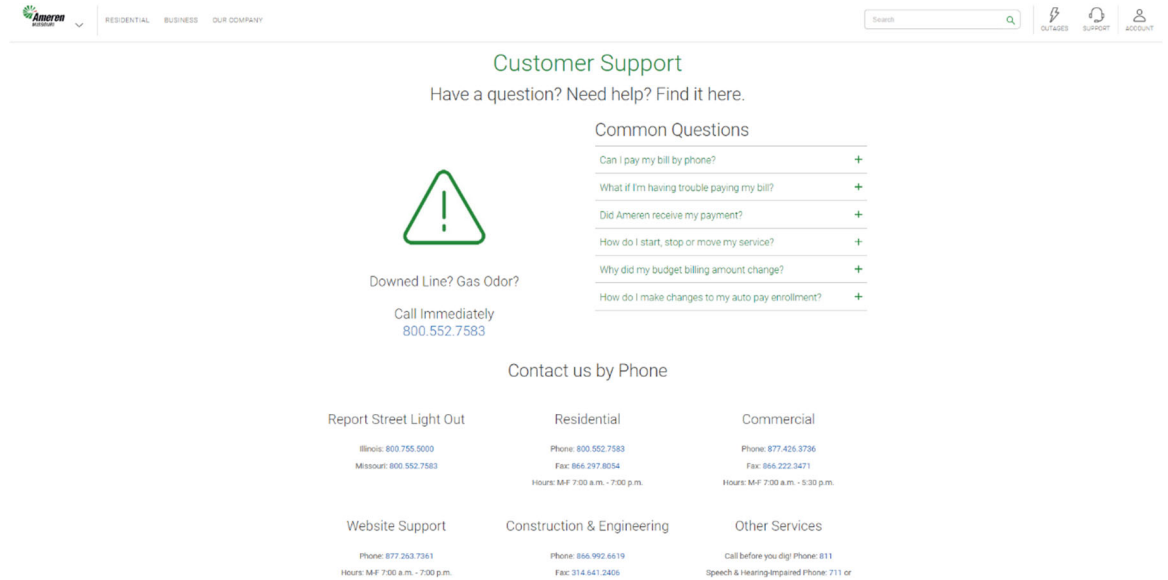
7 All corrections were made in October-November 2024, and all accounts are now
8 correctly on the Anytime User rate as requested by the customers. Most customers did
9 save money on the TOU rate, but for those that didn't, we ensured that it was corrected.
10 This rate selection issue was shared with MPSC Consumer Services Staff in November
11 2024, so they would be aware in case any customers called them with concerns.

12 Ms. Lena Mantle's account was affected by this issue since she mailed in her
13 postcard request to opt out in May 2024, and it was determined that in her case, the
14 difference between the Anytime Users rate and Evening/Morning Savers rate would have
15 resulted in a debit of 1 cent, so no adjustment was made to the account per the Company's
16 Commission approved tariff.

17 **Q. Have you reviewed and considered the recommendation made by Ms.**
18 **Mantle in her direct testimony?**

19 A. Yes. After review of Ms. Mantle's testimony and listening to the call made to
20 our Customer Care Center on October 23, 2024, where she requested information about the rate
21 change confirmation email she received, I agree with her testimony recommendation. Although
22 many customers prefer to self-serve via our website, there should also be an easy option
23 provided in our emailed correspondence to customers who prefer to call and speak to a company

1 representative. As a result, we will update the Contact Us page on our website
2 (ameren.com/missouri/contact-us), moving the phone numbers higher up on the page to
3 make them easier to find. Emails to customers about rate changes will continue to include
4 a link to this page and this will make the phone numbers easier for all customers to find.
5 An example of what that updated web page could look like can be found below.



6

7 In addition, we will begin including the Ameren Missouri Customer Care Center
8 phone number on emails that provide customers with information about changing their rate
9 or confirming their rate has changed.

10 **IV. RESPONSE TO MPSC WITNESS FONTAINE’S TESTIMONY**

11 **Q. Have you reviewed and considered the recommendations made by MPSC**
12 **Senior Research/Data Analyst Sarah Fontaine?**

13 **A.** Yes. We appreciate Ms. Fontaine’s comments and agree that the quarterly
14 update meetings with Staff and OPC to discuss customer service, billing, and outreach have
15 been very beneficial. It is Ameren Missouri’s goal to be transparent and proactively keep Staff
16 informed on various customer related issues in a timely manner, and this is often done via email

1 or phone call. These quarterly meetings provide an opportunity for all parties to discuss any
2 issues together and ensure that any follow-up details can also be shared. We also agree that
3 continuing to share the Estimated/No-Bill Monthly Report is important, as it emphasizes the
4 focus Ameren Missouri has on making certain that our customer billing practices are held to the
5 highest standard. The automation of our meter reading systems is highly reliable, but as with all
6 automation, service breakdowns can occur. We have teams in place to monitor daily
7 digital/metering dashboard information so that when issues do occur, they are resolved quickly,
8 and details can then be shared with Staff in our monthly report.

9 We highly regard the good working relationships we have with Staff and appreciate the
10 role they play in educating and assisting Ameren Missouri's customers. We greatly value our
11 customers, and our collaboration with Staff ultimately supports our mission of Powering the
12 Quality of Life for our customers, while striving to provide consistent, top-notch customer
13 satisfaction.

14 **Q. Does this conclude your rebuttal testimony?**

15 **A.** Yes, it does.

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

AFFIDAVIT OF AUBREY KRCMAR

STATE OF MISSOURI)
)**ss**
CITY OF ST. LOUIS)

Aubrey Krcmar, being first duly sworn states:

My name is Aubrey Krcmar, and on my oath declare that I am of sound mind and lawful age; that I have prepared the foregoing *Rebuttal Testimony*; and further, under the penalty of perjury, that the same is true and correct to the best of my knowledge and belief.



Aubrey Krcmar

Sworn to me this 15th day of January, 2025.