

Exhibit No.:
Issue(s):
Witness/Type of Exhibit:
Sponsoring Party:
Case No.:

Customer Experience
Mantle/Surrebuttal
Public Counsel
ER-2024-0319

SURREBUTTAL TESTIMONY

OF

LENA M. MANTLE

Submitted on Behalf of the Office of the Public Counsel

UNION ELECTRIC COMPANY
D/B/A AMEREN MISSOURI

CASE NO. ER-2024-0319

February 14, 2025

TABLE OF CONTENTS

Testimony	Page
Purpose of Testimony	1
Recommendations	9

SURREBUTTAL TESTIMONY

OF

LENA M. MANTLE

UNION ELECTRIC COMPANY d/b/a AMEREN MISSOURI

CASE NO. ER-2024-0319

1 **Q. Please state your name.**

2 A. My name is Lena M. Mantle.

3 **Q. Are you the same Lena M. Mantle that filed direct testimony in this case?**

4 A. Yes, I am.

5 **PURPOSE OF TESTIMONY**

6 **Q. What is the purpose of your surrebuttal testimony?**

7 A. The purpose of this surrebuttal testimony is to respond to the rebuttal testimony of
8 Ameren Missouri witness Aubrey Krcmar. Ms. Krcmar responded to the
9 recommendations that I made in my direct testimony as the result of a recent
10 experience I had with Ameren Missouri as a customer.

11 **Q. What recommendations did you make in your direct testimony?**

12 A. I recommended that, when an email notice is sent to customers about a change in
13 their service or rates, instead of a link to the customer support page on Ameren
14 Missouri's website, the email should state that the customer should call the
15 service number on the customer's bill or that the customer should go to Ameren
16 Missouri's website to get the number.¹

¹ Mantle Direct, page 2.

1 **Q. What was Ms. Krcmar’s response to your recommendation?**

2 A. Ms. Krcmar said that she agreed with my recommendation.² However, the action
3 she described in her rebuttal testimony that Ameren Missouri would take was
4 different than my recommendation that she said she agreed with.

5 [W]e will update the Contact Us page on our website
6 (ameren.com/missouri/contact-us), moving the phone numbers
7 higher up on the page to make them easier to find. Emails to
8 customers about rate changes will continue to include a link to this
9 page and this will make the phone numbers easier for all customers
10 to find.³

11 **Q. Does this satisfy your recommendation?**

12 A. While I appreciate Ms. Krcmar’s recognition that not all customers want to self-
13 serve via Ameren’s website,⁴ this does not resolve the problem. Moving
14 customer support numbers up on the webpage will still be confusing to customers
15 that believe they are following a link that will give answers to their questions
16 about an email sent to them by Ameren Missouri. This is a favorite method of
17 phishing attempts which we are all told to be aware of. If a phone number is the
18 only way to get answers for people that do not want to self-serve on the website,
19 then the email should tell the customer to call Ameren Missouri at the number
20 provided on their bill.

21 Not only will this make it clear how the customer can get more
22 information, it will also demonstrate that the email is not a phishing attempt to get
23 information from the customer.

² Krcmar rebuttal, page 7.

³ *Id.*, page 8.

⁴ *Id.*, page 7.

1 **Q. Did Ms. Kremer respond to all the concerns you expressed in your direct**
2 **testimony?**

3 A. No. I also express my concern about needing to agree to arbitration language in
4 Ameren Missouri’s online account terms and conditions to get an online account.
5 I could not find any Ameren Missouri witness that responded to my concern.

6 **Q. Why is this a concern?**

7 A. Without an online account, I do not have access to the benefits of the Advanced
8 Metering Infrastructure (“AMI”) that has been installed on my meter;⁵ the cost of
9 which is included in the rates that I am paying. Customers are required to pay for
10 the AMI, yet they cannot access the customer benefits of AMI⁶ unless they agree
11 to the lengthy terms and conditions for online account access. As a part of those
12 terms and conditions, customers must agree to waive their right to litigate claims
13 against Ameren Missouri and, instead, submit any disputes to arbitration. Please
14 see Dr. Geoff Marke’s direct and surrebuttal testimonies for a discussion of the
15 OPC’s position regarding this arbitration clause.

16 **Q. Have any other concerns for customers without an Ameren Missouri online**
17 **account arisen since your direct testimony was filed?**

18 A. Yes. It has recently come to my attention that approximately 750,000 Ameren
19 Missouri customers did not receive a text or email notice of the local public
20 hearing, as the Commission ordered.⁷ I was among these customers that did not
21 receive a text regarding the local public hearing. Though I have issued additional
22 discovery to gain a greater understanding of which customers received the text
23 notification, I assume Ameren Missouri only sent text messages regarding the
24 local public hearings to customers that have online accounts.

⁵ See response to OPC data request 8003 attached as Schedule LMM-S-1.

1 **Q. What are you basing your assumption on?**

2 A. In OPC data request 8000 (attached as Schedule LMM-S-2), I asked Ameren
3 Missouri to describe why some customers did not receive texts. In its response
4 Ameren Missouri did not specifically say why approximately 750,000 of its
5 customers did not get a text. However, it did state:

6 To receive text messages, customers must sign-up and grant
7 Ameren Missouri permission to send text to their cell phones, due
8 to message and data rates that may apply.

9 Ameren Missouri sends me texts regarding outages at my house.⁸ I receive
10 emails from Ameren Missouri monthly updating me on the status of my usage.
11 Yet I did not receive either a text or email notice of the local public hearings.

12 I was told by the Ameren Missouri customer service representative in
13 October 2024 that I do not have an online account.⁹ This leads me to assume that
14 Ameren Missouri only sent texts to customers with online accounts since Ameren
15 Missouri regularly sends me texts and emails, but I did not receive a text
16 notification of the local public hearings.

17 I have sent additional data requests to Ameren Missouri in an attempt to
18 determine exactly who received texts and why these additional notifications were
19 not provided to the vast majority of its customers. As of the filing date of this
20 testimony, I have not received responses from Ameren Missouri to these data
21 requests.

22 **Q. Did the Commission limit Ameren Missouri's additional notification**
23 **requirement to text messages?**

24 A. No. The Commission, in its November 1, 2024, *Order of Clarification*, stated:

⁶ An online account is necessary for customers to use online tools to evaluate and managing their energy usage online, to start, stop, and move their electric service, and to use the rate comparison tools despite the customer paying for the development of these online tools.

⁷ See response to OPC data request 8000 attached as Schedule LMM-S-2.

⁸ I received a text notifying me of an outage in my area as recently as January 30, 2025.

⁹ Mantle direct page 3.

1 Ameren Missouri shall send **an email** and/or text message to
2 customers signed up to receive those notifications on January 17,
3 2025, informing those customers of the upcoming local public
4 hearing locations, dates, and times.

5 (Emphasis added)

6 Similarly, in its October 9, 2024, *Order Setting Local Public Hearings*, the
7 Commission stated:

8 Three days before each local public hearing Ameren Missouri shall
9 provide additional notice of the local public hearing via text
10 message and/or **email** to customers signed up to receive electronic
11 messages from Ameren Missouri.

12 (Emphasis added)

13
14 **Q. You stated that Ameren Missouri regularly sends you emails with updates on**
15 **the status of your usage. Did Ameren Missouri attempt to provide additional**
16 **notice of the local public hearings with an email?**

17 A. No, it did not.

18 **Q. Why not?**

19 A. According to its response to OPC data request 8001, Ameren Missouri explained
20 that it did not send emails because:

21 The Commission's orders (October 9, 2024, clarified by Order
22 dated November 1, 2024) required that for customers who had
23 signed up for text or email notices, texts **and/or** emails would be
24 sent.

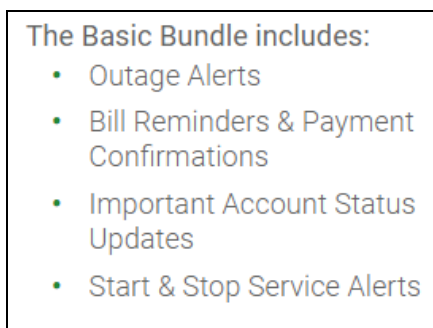
25 **Q. Have you, as a customer, signed up for text or emails?**

26 A. I do not remember signing up for either, but I must have since I am getting both
27 texts and emails from Ameren Missouri and Ameren Missouri stated in response
28 to data request 8000 that “to receive texts, customers must sign-up”.

29 However, I have learned that Ameren Missouri has two different levels of
30 text alerts: the “Basic Bundle” and “Additional Alerts.” Figure 1 below is a snip

1 from Ameren Missouri’s website that specifies the types of notifications included
2 in the “Basic Bundle”:¹⁰

3 Figure 1:



4
5 **Q. What kind of texts have you received?**

6 A. Of the four of these, I have only received outage alerts. I have not received texts
7 regarding bill reminders and payment confirmations, account status updates, or
8 start and stop service alerts.

9 **Q. What types of texts do customers that sign up for Ameren Missouri’s
10 Additional Alerts receive?**

11 A. Ameren Missouri’s website¹¹ provides the following information regarding
12 Additional Alerts:
13

¹⁰ www.ameren.com/alerts

¹¹ www.Ameren.com/alerts

1

Figure 2:

Ameren Missouri Alerts

- **Paperless Billing** – get a link to a copy of your energy bill each month that looks just like the paper version!
- **Budget Billing Adjustments** – If you're enrolled in Budget Billing, you'll automatically get this handy alert to let you know when your monthly payment needs to be adjusted.
- **Monthly Summary** – Receive energy usage and appliance itemization, along with personalized saving tips for your most recent bill.
- **Bill Projection** – Receive an alert in the middle of your billing cycle about how much energy you've used so far and an estimated cost for the end of the billing cycle.
- **Electric Cost Threshold** – Receive alerts when your costs reach 75% and 100% of the amount you've established for your account.
- **High Usage** – Receive an alert to let you know when you exceed your typical daily consumption.
- **Seasonal Rate Change** – Receive an alert before rates change for the season, and tips to help you use less energy.

2

3 **Q. Have you received texts regarding any of these areas?**

4 A. No. According to the website, to get these additional text alerts, the customer
5 must have an online account. I do not have an online account.

6 **Q. Are texts regarding hearing notices included in the description of either the
7 Basic Bundle or the Additional Alerts?**

8 A. No.

1 **Q. You said that you receive regular emails from Ameren Missouri. The**
2 **Commission order included that electronic notice could be provided by**
3 **email. Did you receive an email with the local public hearing notice?**

4 A. No. According to Ameren Missouri’s response to OPC’s data request 8001 it
5 interpreted the language “text and/or emails” in the Commission’s Orders to mean
6 that if it sent out texts, then it did not have to send out emails.¹²

7 **Q. Is that how you interpret the Commission’s order?**

8 A. No. I interpret the Commission Orders to mean that Ameren Missouri should
9 send a text to those customers who have signed up to receive text notifications, an
10 email to those customers who have signed up to receive email notifications, and
11 both a text and email to those customers who have signed up to receive both. The
12 Commission’s *Order Setting Local Public Hearing* that required Ameren
13 Missouri to provide notice of the hearings “to each of its customers.”¹³

14 **Q. Do you recommend that the Commission take any action regarding Ameren**
15 **Missouri’s limited application of the Commission order?**

16 A. No. This was the first time the Commission ordered additional notification of the
17 local public hearings and, for those customers that received it, it appears to have
18 worked well since the public hearings were well attended. Instead, I recommend
19 that Ameren Missouri research the most cost-effective methods to reach the
20 maximum number of customers – residential, commercial, and industrial –
21 utilizing both text messaging and emails and develop a procedure to provide local
22 public hearing information electronically to all its customers, in addition to the
23 traditional notice sent with customer bills at least 10 days prior to the hearings.
24 The result of this research along with an Ameren Missouri specific policy and
25 procedure to enact such notification should be included with direct testimony

¹² See response to OPC data request 8001 attached as Schedule LMM-S-3.

¹³ *Order Setting Local Public Hearings*, October 9, 2024, page 4.

1 explaining the policy in Ameren Missouri’s application of its next general rate
2 case.

3 **RECOMMENDATIONS**

4 **Q. What are your recommendations?**

5 A. I recommend the Commission order:

6 1. In all emails to customers, Ameren Missouri direct customers to
7 call Ameren Missouri’s phone number found on the customer’s bill so that
8 the customer knows what action is needed and that the email is not a
9 phishing attempt; and

10 2. Ameren Missouri allow access to the benefits provided by its AMI
11 meters for all customers without customers having to agree to a long list of
12 terms and conditions.¹⁴

13 I also recommend that Ameren Missouri define, in direct testimony in its next
14 general rate case, its proposal for cost-effective additional notifications of local
15 public hearings to as many of its customers as possible.

16 **Q. Does this conclude your surrebuttal testimony?**

17 A. Yes, it does.

¹⁴ OPC is aware that a few terms and conditions are necessary. However, these terms and conditions should be limited to no more than what is strictly necessary.

**BEFORE THE PUBLIC SERVICE COMMISSION
OF THE STATE OF MISSOURI**

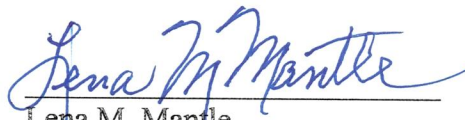
In the Matter of Union Electric Company d/b/a)
Ameren Missouri's Tariffs to Adjust Its)
Revenues for Electric Service) Case No. ER-2024-0319

AFFIDAVIT OF LENA M. MANTLE

STATE OF MISSOURI)
) ss
COUNTY OF COLE)

Lena M. Mantle, of lawful age and being first duly sworn, deposes and states:

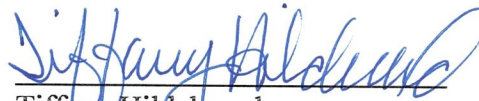
1. My name is Lena M Mantle. I am a Senior Analyst for the Office of the Public Counsel.
2. Attached hereto and made a part hereof for all purposes is my surrebuttal testimony.
3. I hereby swear and affirm that my statements contained in the attached testimony are true and correct to the best of my knowledge and belief.



Lena M. Mantle
Senior Analyst

Subscribed and sworn to me this 13th day of February 2025.

TIFFANY HILDEBRAND
NOTARY PUBLIC - NOTARY SEAL
STATE OF MISSOURI
MY COMMISSION EXPIRES AUGUST 8, 2027
COLE COUNTY
COMMISSION #15637121



Tiffany Hildebrand
Notary Public

My Commission expires August 8, 2027.