

**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

STATEMENT OF POSITIONS

Comes now the Office of the Public Counsel (the "OPC") and submits this Statement of Positions:

1. How should any rate increase be allocated to the customer classes?

Given the size of this rate increase, in allocating the rate increase to the customer classes, the Commission should not impose any revenue neutral shifts. (Marke Surrebuttal Test. 17). Rather, the Commission should impose an equivalent percentage increase in rates across all classes. (*Id.*).

2. How should the rate increase be implemented within certain classes? To resolve that issue, the following issues should be addressed:

A. Should the demand rates of the 3M and 4M classes be increased by a greater amount with a corresponding decrease to the energy charges, as proposed by MECG?

The OPC takes no position on this issue at this time, but reserves the right to do so after the close of evidence.

B. Should the Rider B rates be adjusted?

The OPC takes no position on this issue at this time, but reserves the right to do so after the close of evidence.

C. Should the time-of-day adjustments for non-residential customers in classes 3M, 4M and 11M be modified or held constant?

The OPC takes no position on this issue at this time, but reserves the right to do so after the close of evidence.

3. Should the Commission authorize a new end-use rate schedule for EV charging as proposed by MECG?

No, the Commission should not authorize a new end-use rate schedule for EV charging. (Marke Surrebuttal Test. 17-18). In addition to the concerns noted by the

Staff of the Commission (“Staff”) and Ameren Missouri, such a rate raises concerns with gradualism and complexity. (*Id.*). It further raises concerns about increasing demand peaks at a time when the wholesale market already lacks excess energy. (*Id.*).

4. Should the Commission order a progress report on the non-residential rate design working docket EW-2023-0031 as proposed by MECG?

The OPC takes no position on this issue at this time, but reserves the right to do so after the close of evidence.

WHEREFORE, the Office of the Public Counsel respectfully submits its Statement of Positions.

Respectfully submitted,

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CERTIFICATE OF SERVICE

I hereby certify that copies of the forgoing have been mailed, emailed, or hand-delivered to all counsel of record this 10th day of March 2025.

/s/ Lindsay VanGerpen