

Exhibit No.: _____
Issue(s): Customer Disclaimer/
Transparent Billing Practice/
MEEIA Low-Income Exemption
Witness/Type of Exhibit: Marke/Direct
Sponsoring Party: Public Counsel
File No.: ER-2016-0179

DIRECT TESTIMONY

OF

GEOFF MARKE

Submitted on Behalf of the Office of the Public Counsel

**UNION ELECTRIC COMPANY
D/B/A AMEREN MISSOURI**

FILE NO. ER-2016-0179

December 9, 2016

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


In the Matter of Union Electric)
Company d/b/a Ameren Missouri's) File No. ER-2016-0179
Tariffs to Increase Its Revenues)
for Electric Service)

AFFIDAVIT OF GEOFF MARKE

STATE OF MISSOURI)
) ss
COUNTY OF COLE)

Geoff Marke, of lawful age and being first duly sworn, deposes and states:

1. My name is Geoff Marke. I am a Regulatory Economist for the Office of the Public Counsel.
2. Attached hereto and made a part hereof for all purposes is my direct 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.




Geoff Marke
Regulatory Economist

Subscribed and sworn to me this 9th day of December 2016.



JERENE A. BUCKMAN
My Commission Expires
August 23, 2017
Cole County
Commission #13754037



Jerene A. Buckman
Notary Public

My Commission expires August 23, 2017.

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DIRECT TESTIMONY
OF
GEOFF MARKE
UNION ELECTRIC COMPANY
d/b/a Ameren Missouri
FILE NO. ER-2016-0179

1 **I. INTRODUCTION**

2 **Q. Please state your name, title and business address.**

3 A. Geoff Marke, PhD, Economist, Office of the Public Counsel (OPC or Public Counsel), P.O.
4 Box 2230, Jefferson City, Missouri 65102.

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

6 A. I am employed by the OPC as a Regulatory Economist.

7 **Q. Please describe your education and employment background.**

8 A. I received a Bachelor of Arts Degree in English from The Citadel, a Masters of Arts Degree
9 in English from The University of Missouri, St. Louis, and a Doctorate of Philosophy in
10 Public Policy Analysis from Saint Louis University (“SLU”). At SLU, I served as a graduate
11 assistant where I taught undergraduate and graduate course work in urban policy and public
12 finance. I also conducted mixed-method research in transportation policy, economic
13 development and emergency management.

14 I have been in my present position with OPC since April of 2014 where I have been
15 responsible for economic analysis and policy research in electric, gas and water utility
16 operations. Prior to joining OPC, I was employed by the Missouri Public Service
17 Commission as a Utility Policy Analyst II in the Energy Resource Analysis Section, Energy
18 Unit, Utility Operations Department, Regulatory Review Division. My primary duties were
19 reviewing, analyzing and writing recommendations concerning integrated resource planning,
20 renewable energy standards, and demand-side management programs for all investor-owned

1 electric utilities in Missouri. I have also worked for the Missouri Department of Natural
2 Resources (later transferred to the Department of Economic Development), Energy Division
3 as a Planner III and was the lead policy analyst on electric cases. My private sector work
4 includes Lead Researcher for Funston Advisory in Detroit, Michigan, where I did a variety of
5 specialized consulting engagements for both private and public entities.

6 **Q. Have you been a member of, or participate in, any work groups, committees, or other**
7 **groups that have addressed electric utility regulation and policy issues?**

8 A. Yes. I am currently a member of the National Association of State Consumer Advocates
9 (NASUCA) Distributed Energy Resource Committee which shares information and
10 establishes policies regarding energy efficiency, renewable generation, and distributed
11 generation, and considers best practices for the development of cost-effective programs that
12 promote fairness and value for all consumers. I am also a member of NASUCA's Electricity
13 Committee and NASUCA's Water Committee which are tasked with analyzing current
14 issues affecting residential consumers.

15 **Q. Have you testified previously before the Missouri Public Service Commission**
16 **("Commission")?**

17 A. Yes. A listing of the cases in which I have previously filed testimony and/or comments
18 before this commission is attached in GM-1.

19 **Q. What is the purpose of your rebuttal testimony?**

20 A. The purpose of this testimony is three-fold:

- 21 1. To sponsor consumer disclaimer language and consent in regards to large capital
22 investments in rooftop solar and energy efficiency;
- 23 2. To recommend the Commission order Ameren Missouri to modify its residential bill
24 to be more transparent and to better inform customers of the charges being assessed,
25 which is consistent with the Commission's residential billing rules; and

- 1 3. To recommend that Ameren Missouri’s low-income MEEIA surcharge exemption costs be
2 spread in an equitable manner to all customer classes moving forward.

3 **II. CONSUMER DISCLAIMER**

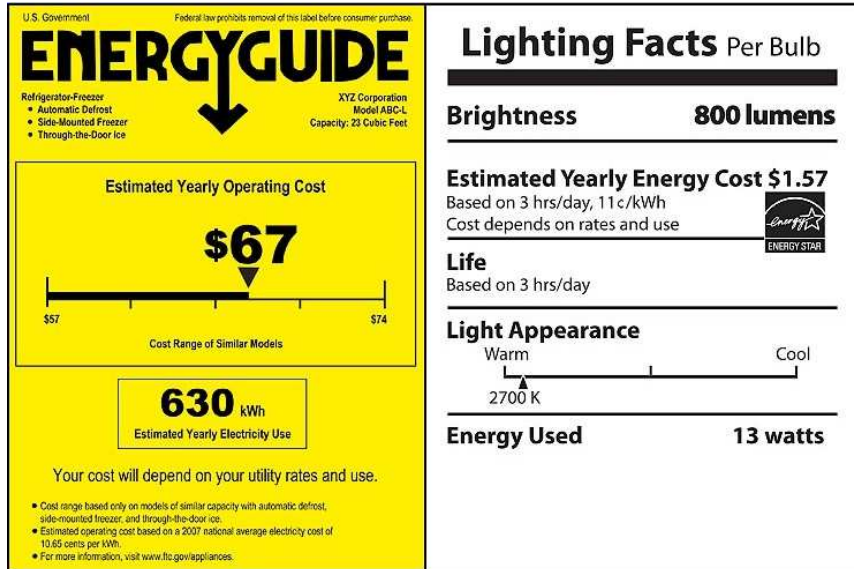
4 **Consumer Protection Regarding Fixed Charge Increases and Capital Investments**

5 **Q. Is OPC concerned with the frequency of requests to increase the residential customer**
6 **charge and other fixed charge increases?**

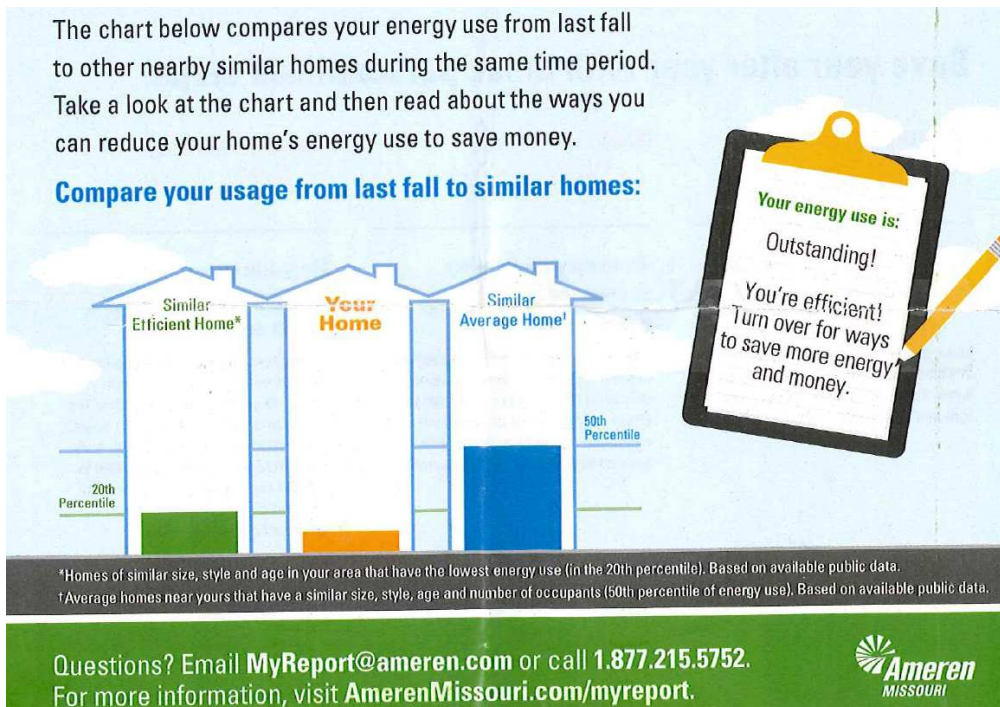
7 A. Yes. OPC strongly believes the customer charge should not be a conduit to address the
8 Company’s perceived external threats and certainly not at the expense of those who can least
9 afford to lose further control over their financial lives such as low-income and fixed-income
10 ratepayers. To that end, much has already been stated in previous cases—and and will be
11 expounded on in rebuttal in this case. However, beyond low and fixed-income ratepayers, the
12 next obvious subset of ratepayers unfairly penalized by an increased customer charge are
13 those who have invested time and money in being efficient, conservative and
14 environmentally responsible. This is because increased customer charges offset the financial
15 savings of any previous efficiency actions and erode the incentive to improve appliances or
16 better insulate their home moving forward.

17 Ratepayers who just made capital investments or are considering making investments in
18 energy efficiency measures will have much longer payback periods over which to recoup
19 their investments if the customer charge is increased. This can be illustrated by looking at the
20 U.S. Department of Energy’s, EnergyGuide and Lighting Facts labels placed on appliances
21 and lighting and by looking at the Home Energy Report (a MEEIA-sponsored program
22 where usage comparisons are mailed to select Ameren Missouri residents to induce energy
23 efficiency actions) as seen in Figures 1, 2 and 3 respectively.

1 Figure 1: Example of The EnergyGuide and Lighting Facts label for new appliances and lighting¹



2
3 Figure 2: Example of Ameren Missouri Home Energy Report²



4

¹ U.S. Department of Energy (2013) Comparing appliance and lighting energy costs online just got easier. <http://energy.gov/energysaver/articles/comparing-appliance-and-lighting-energy-costs-online-just-got-easier>

² Fehrenbacher. K (2014) Report: Opower has quietly filed for its long-awaited IPO. <https://gigaom.com/2014/02/12/report-opower-has-quietly-filed-for-its-long-awaited-ipo>

1 Figure 3: Example of Ameren Missouri Home Energy Report³

Save year after year with these personalized steps!

ANNUAL SAVINGS: UP TO 10% OF ENERGY COSTS	ANNUAL SAVINGS: UP TO 25% OF HEATING COSTS	ANNUAL SAVINGS: UP TO 50% OF HEATING COSTS
Turn off the lights you don't need and save energy.	Tune up your heating system for best performance.	Upgrade to an efficient heating system to stay warm and save.
Make it a habit! During the daytime or any time you leave a room, turn off the lights. You'll get to enjoy more natural light and save on your energy costs!	The fall is the best time to tune up your heating system so it keeps working efficiently through the cold months. Check or replace the air filters every two to three months and schedule a tune-up with a qualified contractor.	If your heating system is struggling to keep up with the cold, it's time to switch to an efficient system. Besides saving energy, new models are quieter, with better temperature control. And Ameren Missouri offers up to \$900 in rebates for eligible models. For more information, visit AmerenMissouri.com/hvac .

Questions? Email MyReport@ameren.com or call **1.877.215.5752**.
For more information, visit AmerenMissouri.com/myreport.

2
3
4 Increasing the fixed charges on a customer's bill distorts these pricing estimates and would
5 minimize the benefits created by Ameren Missouri's energy efficiency programs to date.
6 This same logic applies to distributive generation such as rooftop solar.

7 If a ratepayer considers making a large-scale capital, they should be cognizant of the risk
8 involved with that purchase. In some ways, this is no different than any other long-lived
9 investment. For example, if you pay extra for an electric car, you run the risk of gas prices
10 falling after you buy the car and your investment not paying off. The difference here is that
11 much of the risk is subject to Commission orders. With most financial risks, there's a chance
12 the underlying prices will go up or down 5% but a much smaller chance that they'll change

³ Fehrenbacher, K (2014) Report: Opower has quietly filed for its long-awaited IPO.
<https://gigaom.com/2014/02/12/report-opower-has-quietly-filed-for-its-long-awaited-ipo>

1 by over 50%. However, this is exactly the sort of risk ratepayers who have elected to become
2 more efficient are faced with whenever a rate case docket is opened.

3 In the past five electric rate cases before this Commission, utilities have proposed fixed
4 monthly customer charge increases of 50%,⁴ 178%,⁵ 21%,⁶ 52%,⁷ and 11%⁸ as well as
5 Ameren Missouri's proposed "grid-access charge" seeking a 61% fixed charge increase
6 respectively.⁹ If existing fixed charges are increased or created, ratepayers who have made
7 investments in energy efficiency or distributed generation will have longer payback periods
8 over which to recoup their investments and all ratepayers will be made worst off by having
9 the benefits of energy efficiency minimized and the costs maximized (includes MEEIA-
10 related performance incentives). Despite the increased customer charge tactic largely being
11 abandoned by utilities throughout the country,¹⁰ ratepayers who made good-faith investments
12 are still exposed to future regulatory rate design departures or rulemaking decisions that
13 could have an adverse impact on their past decisions to proactively take control of their bills.

⁴ ER-2014-0351 Direct Testimony of W. Scott Keith p. 14, 8.

⁵ ER-2014-0370 Direct Testimony of Tim Rush p. 65, 9.

⁶ ER-2016-0023 Staff's Rate Design and Class Cost-of-Service Report p. 3, 5.

⁷ ER-2016-0156 Direct Testimony of Bradley D. Lutz p.32, 10.

⁸ ER-2016-0285 Direct Testimony of Marisol E. Miller, schedule MEM-3 p. 6.

⁹ That is assuming a fixed charge increase in total from \$8.00 to \$12.89. See also ER-2016-0285 Direct Testimony of William R. Davis p. 19-26.

¹⁰ Trabish, H.K. (2015) Beyond fixed charges: 'Disruptive Challenges' author charts new utility path. Utilitydive.
<http://www.utilitydive.com/news/beyond-fixed-charges-disruptive-challenges-author-charts-new-utility-pat/408971/>

1 **Q. Could you provide an example of this threat in another state?**

2 A. Yes. Recently, the Public Utilities Commission of Nevada (“PUCN”) ordered that ratepayers
3 with installed solar would have their fixed charges tripled from \$12.75 to almost \$40.00 over
4 the next four years. In addition, the PUCN changed the netting to hourly rather than monthly
5 and instituted a low rate for sales to the grid.¹¹ These changes will be applied retroactively to
6 Nevada’s 18,000 existing solar customers, in addition to any new customers.¹²

7 **Q. Does OPC have a consumer protection proposal for rooftop solar?**

8 A. Yes. OPC has drafted disclaimer language to alert potential buyers that their PV systems are
9 subject to possible future rules and/or rate changes which could have an impact on the
10 economic assumptions behind their purchase. OPC’s proposed language to be included as a
11 disclaimer is included in Figure 4.

¹¹ 15-070401 & 15-07042. Application of the Nevada Power Company and Sierra Pacific Power Company d/b/a NV Energy for approval of a cost-of-service study and net metering tariffs.

http://pucweb1.state.nv.us/PDF/AxImages/DOCKETS_2015_THRU_PRESENT/2015-7/9692.pdf

¹² Pyper, J. (2016) Does Nevada’s controversial net metering decision set a precedent for the Nation? Greentechmedia. <http://www.greentechmedia.com/articles/read/nevada-net-metering-decision>

1 Figure 4: Proposed disclaimer language for future rooftop solar purchases

2 **Disclaimer: Possible Future Rules and/or Rate Changes**
3 **Affecting Your Photovoltaic (PV) System**

- 4
- 5 1. Your PV system is subject to the current rates, rules and regulations ordered by the
- 6 Missouri Public Service Commission (“Commission”). The Commission may alter its
- 7 rules and regulations and/or approve future rate increases. If this occurs, your PV system
- 8 is subject to those changes and you will be responsible for paying any future increases to
- 9 electricity rates, charges or service fees from Ameren Missouri.
- 10 2. Ameren Missouri’s electricity rates, charges and service fees are determined by the
- 11 Commission and are subject to change based upon the decision of the Commission. These
- 12 future adjustments may positively or negatively impact any potential savings or the value
- 13 of your PV system.
- 14 3. Any future electricity rate projections which may be presented to you are not produced,
- 15 analyzed or approved by Ameren Missouri or the Commission. They are based on
- 16 projections formulated by external third parties not affiliated with Ameren Missouri or the
- 17 Commission.

18 Print installer’s name _____

19 Installer’s signature _____

20 Date signed _____

21 Print customer-generator’s name _____

22 Customer-generator’s signature _____

1 This disclaimer would not regulate the financial contents of the solar provider's offer. It
2 would require all residential customers who are considering rooftop solar to be aware that the
3 price and payback assumptions seen today are not static and, in part, subject to considerable
4 regulatory oversight.

5 The disclaimer would be placed in Ameren Missouri's tariff in the Interconnection
6 Application/Agreement for Net Metering Systems with Capacity of 100 kW or Less tariff
7 sheet 171.10 within the Energy Pricing and Billing section. Ameren Missouri would also be
8 requested to maintain electric copies of these disclaimers with signed consent for future
9 reference, including Commission Staff and OPC audits.

10 **Q. Is OPC proposing similar language for energy efficiency investments?**

11 A. Yes. The same logic applies equally to all energy efficiency products. However, OPC has
12 elected to limit the disclaimer to measures/actions requiring a third-party installer on the
13 ratepayers premise as well as Ameren Missouri's behavioral response program. This would
14 include the following programs currently in place in Ameren Missouri's Commission-
15 approved MEEIA portfolio:

16 **Non-Residential/Business Programs:**

- 17 • Standard Incentive Program
- 18 • Custom Incentive Program
- 19 • Retro-Commissioning Program
- 20 • New Construction Incentive Program
- 21 • Small Business Direct Install Incentive Program

22 **Residential Programs:**

- 23 • HVAC Program
- 24 • Home Energy Reports Program

25 OPC's proposed language to be included as a disclaimer is included in Figure 5 below:

1 Figure 5: Proposed disclaimer language for energy efficiency investment

2
3 **Disclaimer: Possible Future Rules and/or Rate Changes**

4 **Affecting Your Energy Efficiency Investment**

- 5 1. Your energy efficiency investment is subject to the current rates, rules and regulations
6 ordered by the Missouri Public Service Commission (“Commission”). The Commission
7 may alter its rules and regulations and/or approve future rate increases. If this occurs, your
8 energy efficient investment is subject to those changes and you will be responsible for
9 paying any future increases to electricity rates, charges or service fees from Ameren
10 Missouri.
- 11 2. Ameren Missouri’s electricity rates, charges and service fees are determined by the
12 Commission and are subject to change based upon the decision of the Commission. These
13 future adjustments may positively or negatively impact any potential financial savings or
14 the value of your energy efficient investment.
- 15 3. Any future electricity rate projections which may be presented to you are not produced,
16 analyzed or approved by Ameren Missouri or the Commission. They are based on
17 projections formulated by external third parties not affiliated with Ameren Missouri or the
18 Commission.

19 Print installer’s name _____

20 Installer’s signature _____

21 Date signed _____

Print customer’s name _____

Customer’s signature _____

Date signed _____

1 This disclaimer would require all residential and business customers considering making a
2 large energy efficient investment to be made aware the price and payback assumptions seen
3 today are not static and, in part, subject to considerable regulatory oversight.

4 The disclaimer would be required for any transaction with non-residential customers as well
5 as residential transactions involving the Company's HVAC and Home Energy Report
6 program. The disclaimer would also be following each of the aforementioned programs
7 description in Ameren Missouri's tariff as follows:

8 **Non-Residential/Business Programs Tariff Sheet No. 201.4 and:**

- 9 • Sheet No. 202 Standard Incentive Program
- 10 • Sheet No. 203 Custom Incentive Program
- 11 • Sheet No. 204 Retro-Commissioning Program
- 12 • Sheet No. 205 New Construction Incentive Program
- 13 • Sheet No. 206 Small Business Direct Install Incentive Programs

14 **Residential Programs Tariff Sheet No. 211.3 and:**

- 15 • Sheet No. 214 HVAC Program
- 16 • Sheet No. 215 Home Energy Reports Program


17 **III. TRANSPARENT BILLING PRACTICES**

18 **Q. Please describe Ameren Missouri's current bill format.**

19 A. Ameren Missouri provides a one-page bill/energy statement that contains a variety of
20 information including one-year electric service details based on kilowatt hours (kWh),
21 "some" of the charge detail components, the amount due and due date, and an energy
22 efficiency message. A sample copy of the residential bill/energy statement can be seen in
23 Figures 6 and 7 respectively.

1 Figure 6: Side 1 of the sample Ameren Missouri residential bill/energy statement

Sample of Residential Energy Statement



Ways to Reach Us

- AmerenMissouri.com
- 1.800.552.7583
- PO Box 790352 St. Louis, MO 63179-0352

for correspondence only

FOCUSED ENERGY. For life.

Current Charge Detail for Statement 03/30/2016

Electric Charge - Residential	\$32.40
Fuel Adjustment Charge	\$0.54
Energy Efficiency Investment Charge	-\$0.30
St. Louis City Municipal Charge	\$1.36
Current Charge	\$34.00
Budget Bill Adjustment	\$4.00
Budget Bill Amount	\$38.00
Amount Due	\$38.00

AMOUNT DUE \$38.00 ← Total Amount Due

The amount of this bill will be automatically deducted from your bank account on 04/11/2016.

Due Date: 04/11/2016

Account Number: 1234567890
 Customer Name: John Doe
 Service Address: 1234 Main Street

Previous Statement: \$38.00
 Last Payment - 03/10/2016: \$38.00

Your Budget Billing balance is ahead \$32.69 after paying this bill.

Electric Service from 02/25/2016 - 03/28/2016 32 Days


Meter Number	Current Reading	Previous Reading	Current Usage	Reading Type
E 01234560	021242	020960	282 kWh	Actual

April Statement

Service

Electric Service Details

Electric Usage in Kilowatt Hours (kWh)



Average Monthly Temperature (°F)

Electric Usage Summary (kWh)

So far this year, you're using **13.6% less** than last year

13.6%

USAGE

2015: 1,173 kWh


2016: 1,014 kWh

Usage from Jan-Apr for 2016

Simple Solution.

Opening windows creates a cross-breeze, allowing you to naturally cool your home without switching on air conditioners. This is an ideal tactic in spring to save energy.

Electric-Savings Tips



0766 2194946 000767 001633 00010001
INTERNAL USE ONLY

2

3

4

5

1 Figure 7: Side 2 of the sample Ameren Missouri residential bill/energy statement

Please return this portion with your payment.

Ameren MISSOURI

Check if you have address changes on back.

Amount Due & Due Date →

AMOUNT DUE	Due Date
\$38.00	April 11, 2016

Delinquent Amount After Due Date →

Delinquent Amount After Due Date	Account Number
\$38.57	1234567890

Amount Enclosed: \$

>000001 9012142 0001 092139 10Z
00786 1 AV 0.376 5-D 63108

John Doe
1234 Main Street
Anytown, USA 12345-6789

Remittance Address →

AMEREN MISSOURI
PO BOX 88068
CHICAGO IL 60680-1068

0000000 00000000000000 00000000 00000000 00000000

Ameren MISSOURI

- AmerenMissouri.com
- 1.800.552.7583
- PO Box 790352 St. Louis, MO 63179-0352

for correspondence only

FOCUSED ENERGY. For Life.

Account Messages

SPEEDPAY offers residential customers convenient payment options. You can pay your bill using MasterCard, VISA or American Express 24/7 - just call 1.866.268.3729. For recurring payments visit us at AmerenMissouri.com.

Account Messages

Spring Has Sprung. Spring is here and the warmer weather makes it a good time for yard work and other outdoor activities. No matter what's on your agenda, electrical safety should be an important part of your plans.

Call Before You Dig. Protect yourself and your utility services by calling **8.1.1.** before planting trees, gardens or digging in your yard. Having underground lines properly marked helps prevent service disruptions and injuries.

Right Tree, Right Place. Planting the right species of tree in the right place prevents interference with your service and ensures trees are an asset to you and your community. Find planting tips at AmerenMissouri.com/trees.

Be Aware. Be Prepared. If your property is damaged by storms, don't remove debris near or touching power lines. Assume all downed lines are energized and call us at 1.800.552.7583 to report the location.

Address Changes or Corrections → **Address Change**

Name _____
Address _____
City, State, Zip _____
Phone Number _____

AmerenMissouri.com/WaysToPay

- ONLINE E-CHECK**
- PHONE** 866.268.3729
- IN PERSON** FIND A PAY STATION AT AMERENMISSOURI.COM/PAYSTATION
- ONLINE CREDIT CARD**
- MAIL** STUB & CHECK

1 **Q. What charge detail components are currently missing from Ameren Missouri's format?**

2 A. There is no customer charge listed. Moreover, residential customers would not be aware of
3 their variable usage rate from the bill. That is, in the winter season, customers would not
4 know that the more electricity they consume they cheaper the service becomes. Finally, there
5 is no indication that ratepayers are being charged for a low-income pilot program. Figure 8
6 highlights the specific current charge details on Ameren Missouri's bill statement.

7 Figure 8: Current Charge details on Ameren Missouri's residential bill

Current Charge Detail for Statement 03/30/2016	
Electric Charge - Residential	\$32.40
Fuel Adjustment Charge	\$0.54
Energy Efficiency Investment Charge	-\$0.30
St. Louis City Municipal Charge	\$1.36
Current Charge	\$34.00
Budget Bill Adjustment	\$4.00
Budget Bill Amount	\$38.00
Amount Due	\$38.00

Omitted Charge Details:

- Customer charge – per month
- Energy charge (summer and winter) – per kWh
- Low-income pilot program charge – per month

8
9 **Q. Do any other investor-owned electric utilities in Missouri omit these charges on their**
10 **bills?**

11 A. No.

12 **Q. Are there Commission rules that specifically require authorized charges to be clearly**
13 **stated on residential bills?**

14 A. Yes. 4 CSR 240-13.020(9) (E) Billing and Payment Standards states:

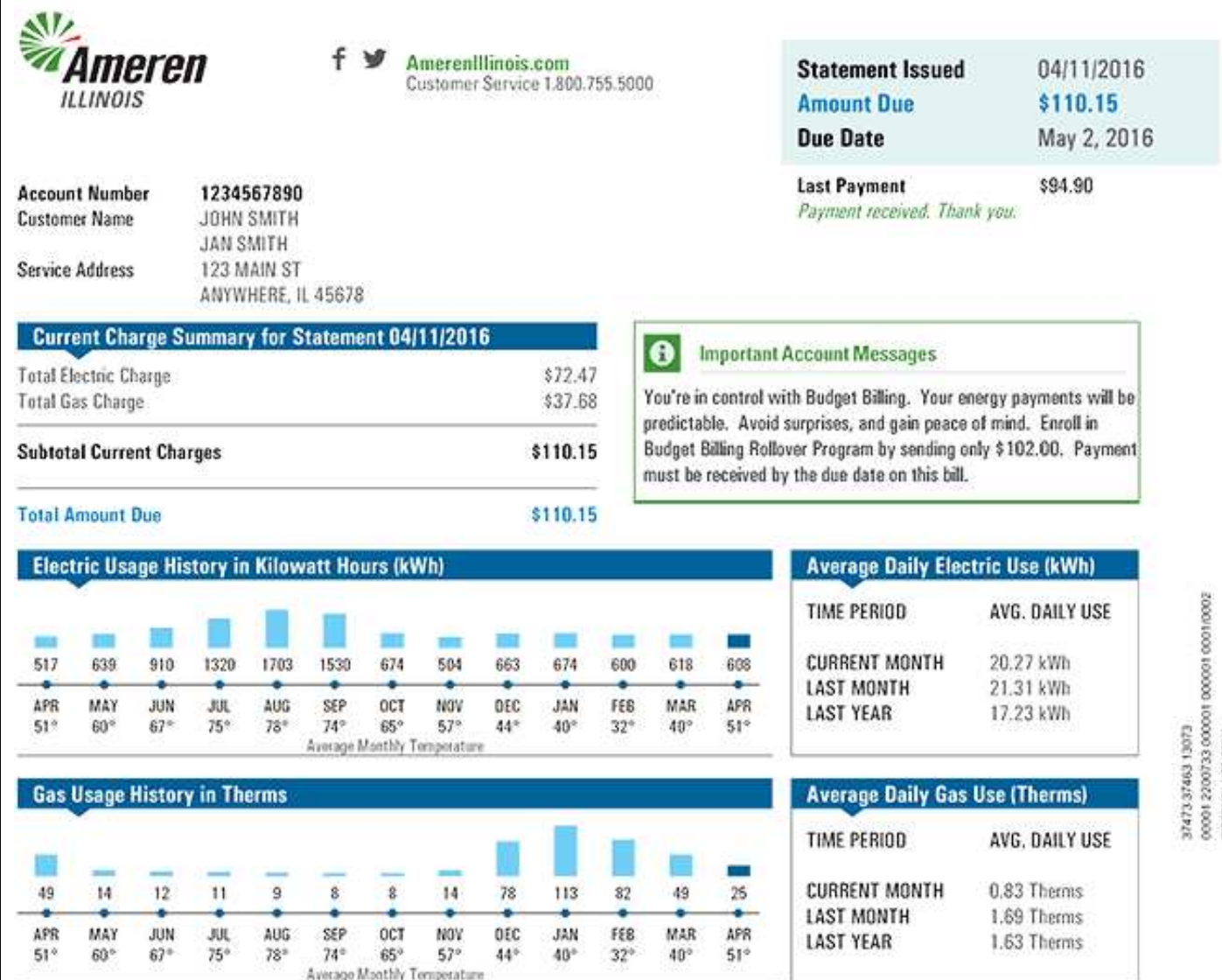
15 Every bill for residential utility service shall clearly state---

16 (E) The amount due for other authorized charges;

1 **Q. Does Ameren Illinois include the same limited information on residential customer bills**
 2 **as Ameren Missouri?**

3 A. No. Figure 9 and 10 are the representative Ameren Illinois electric bill sample from its
 4 website.




5 Figure 9: Side 1 of Ameren Illinois Bill Summary¹³



6

¹³ Ameren Illinois (2016) Sample of the New Bill Design <https://www.ameren.com/illinois/csc/your-bill/sample-bill>

1 Figure 10: Side 2 of Ameren Illinois Bill Summary¹⁴

		  AmerenIllinois.com Customer Service 1.800.755.5000		Statement Issued 04/11/2016 Amount Due \$110.15 Due Date May 2, 2016		
Account Number	1234567890	Customer Name	JOHN SMITH JAN SMITH			
Service Address	123 MAIN ST ANYWHERE, IL 45678					
Payment Details						
Payment Received	DATE	AMOUNT				
	April 5, 2016	\$94.90				
Electric Service Residential Billing Detail - Rate Zone I 03/09/2016 - 04/08/2016 (30 days)						
Electric Meter Read for 03/09/2016 - 04/08/2016 (30 days)						
READ TYPE	METER NUMBER	CURRENT METER READ	PREVIOUS METER READ	READ DIFFERENCE	MULTIPLIER	USAGE
Total kWh	12345678	64748.0000 Actual	64140.0000 Actual	608.0000	1.0000	608.0000
Usage Summary						
Total kWh	608.0000	Non-Summer kWh			608.0000	
Electric Delivery						
	CHARGE DESCRIPTION	USAGE	UNIT	RATE	CHARGE	
Ameren Illinois	Customer Charge				\$12.61	
DS-1 Residential Delivery Service	Meter Charge				\$5.00	
	Distribution Delivery Charge Non-Summer	608.00	kWh	@ \$0.02770000	\$16.84	
	Electric Environmental Adjustment	608.00	kWh	@ \$0.00017050	\$0.10	
	Energy Efficiency Demand Response	608.00	kWh	@ \$0.00410000	\$2.49	
		Electric Delivery			\$37.04	
Electric Supply						
Ameren Illinois	Purchased Elec Non-Summer 0-800 kWh	608.00	kWh	@ \$0.05836000	\$35.48	
BGS-1 Basic Generation Service	Purchased Electricity Adjustment	608.00	kWh	@ -\$0.00244874	\$-1.49	
	Supply Cost Adjustment	608.00	kWh	@ \$0.00163000	\$0.99	
	Transmission Service Charge	608.00	kWh	@ \$0.00772000	\$4.69	
		Electric Supply			\$39.67	
Taxes and Other Fees						
	Municipal Tax				\$0.39	
	Illinois State Electricity Excise Tax				\$2.01	
	EDT Cost Recovery				\$0.87	
		Total Tax Related Fees			\$3.27	
					Total Electric Charges	\$79.98

00001 200773 000069 00000 00010000



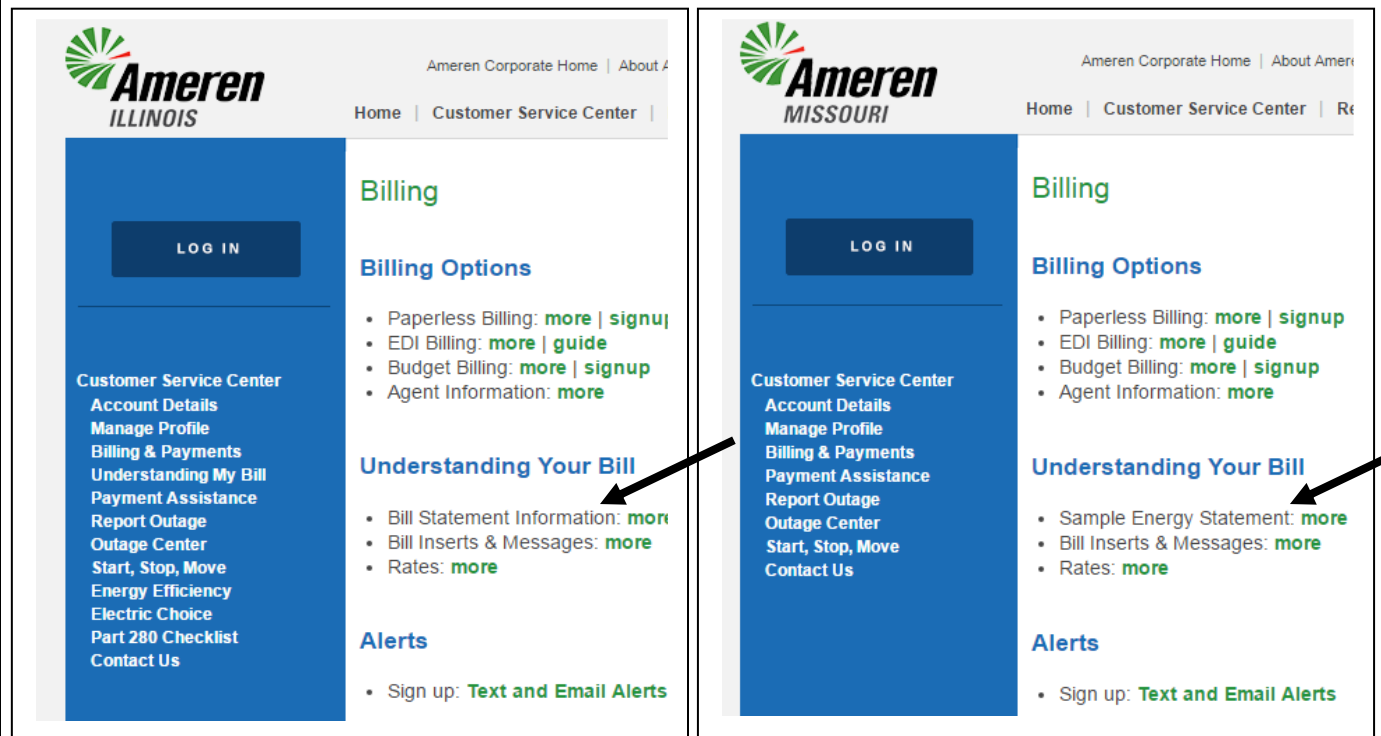
2
3

¹⁴ Ibid.

1 **Q. Does the Ameren Missouri website provide the same level of finite billing details as the**
2 **Ameren Illinois website?**

3 A. No. Figure 11 provides a snapshot breakdown of each website’s billing options with
4 emphasis placed on the different sets of information included.

5 Figure 11: Ameren Illinois and Missouri’s on-line billing options^{15,16}



18 The Commission should note that within the Ameren Illinois website option under the
19 “Understanding Your Bill” there is a hyperlink for “Bill Statement Information.” That link
20 takes customers to the following screen shown on Figure 12.

21
22
23 Figure 12: Ameren Illinois, Understanding My New Bill

¹⁵ Ameren Illinois (2016) Payments. <https://www.ameren.com/illinois/csc/payments>

¹⁶ Ameren Missouri (2016) Payments. <https://www.ameren.com/missouri/csc/payments>

Understanding My New Bill

A new bill is here for Ameren Illinois customers. This new design was based on feedback from our customers and we hope you find it easier to read with more helpful information.



My New Bill Explained

Learn More

▶ **Video: Understanding My Bill**



Sample Bill

▶ **Brochure: A Look at the New Bill**



Terms and Definitions

▶ **Choose Paperless Billing**

1

2

3

4

5

6

7

The Commission will note that Ameren Illinois includes easily accessible information regarding billing education, terms and definitions, as well as explanatory videos. In addition to including a sample bill the website also contains a pdf filed brochure that provides detailed information explaining the Ameren Illinois bill including explanations for commonly used terms and definitions found on a residential bill (see GM-2). Ameren Missouri's website does not contain comparable amounts of information.¹⁷

8

Q. Is OPC currently investigating other elements related to billing practices?

9

A. Yes. We submitted a series of data requests (see GM-3) to Ameren Missouri modeled after questions developed by the Indiana Public Service Commission posed to the various Indiana investor-owned utilities. The Indiana surveys and results were highlighted in a 2016 case study by the National Regulatory Research Institute ("NRRRI").¹⁸ It is OPC's intention to submit these same questions to all of the investor-owned utilities in Missouri. Based on the responses, further action may be necessary.

10

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¹⁷ It should be acknowledged that billing information for Ameren Illinois is slightly more complex due to its deregulated status.

¹⁸ National Regulatory Research Institute (2016). NRRRI 16-03 Billing rules standards and practices. <http://nrri.org/download/nrri-16-03-billing-rules-standards-and-practices/>

1 **Q. What are OPC's recommendations?**

2 A. OPC recommends that Commission order the Company to comply with its rules regarding
3 the clear display of all authorized charges on residential bills and further recommends that
4 this information be extended to the small general service class as well. Additionally, OPC
5 strongly recommends that Ameren Missouri adopt the equal level of customer bill education
6 that is afforded to Ameren Illinois ratepayers.

7 **IV. MEEIA LOW-INCOME EXEMPTION**

8 **Q. Why are low-income ratepayers exempt from the MEEIA surcharge?**

9 A. Ameren Missouri had proposed that qualifying low-income customers be exempt from future
10 MEEIA surcharges in its last rate case ER-2014-0258. That recommendation was ultimately
11 accepted by all parties and the Commission with those costs being borne solely by residential
12 customers.

13 **Q. What is OPC's recommendation regarding treatment of this exemption moving
14 forward?**

15 A. OPC recommends that the Commission maintain the MEEIA surcharge exemption for low-
16 income customers. However, those costs should be borne by all customer classes, excluding
17 lighting, rather than the residential class alone. Similar to other low-income programs in
18 Missouri, the other residential customers are not the causers of this cost any more than are the
19 members of other customer classes. If the Commission continues to find it appropriate to
20 impose this exemption, it makes the most sense to spread the cost among all of Ameren
21 Missouri's customer classes.

22 **Q. Does this conclude your testimony?**

23 A. Yes.

CASE PARTICIPATION OF
GEOFF MARKE, PH.D.

Company Name	Employed Agency	Case Number	Issues
Union Electric Company d/b/a Ameren Missouri	Office of Public Counsel (OPC)	ER-2016-0179	Direct: Consumer Disclaimer / Transparent Billing Practice / MEEIA Low-Income Exemption
Kansas City Power & Light	OPC	ER-2016-0156	Direct: Consumer Disclaimer
Union Electric Company d/b/a Ameren Missouri	OPC	ET-2016-0246	Rebuttal: EV Charging Station Policy
KCP&L Greater Missouri Operations Company	OPC	ER-2016-0156	Direct: Consumer Disclaimer Rebuttal: Regulatory Policy / Customer Experience / Historical & Projected Customer Usage / Rate Design / Low-Income Programs Surrebuttal: Rate Design / MEEIA Annualization / Customer Disclaimer / Greenwood Solar Facility / RESRAM / Low-Income Programs
Empire District Electric Company, Empire District Gas Company, Liberty Utilities (Central) Company, Liberty Sub-Corp.	OPC	EM-2016-0213	Rebuttal: Response to Merger Impact Surrebuttal: Resource Portfolio / Transition Plan
Working Case: Polices to Improve Electric Regulation	OPC	EW-2016-0313	Comments on Performance-Based and Formula Rate Design
Working Case: Electric Vehicle Charging Facilities	OPC	EW-2016-0123	Comments on Policy Considerations of EV stations in rate base
Empire District Electric Company	OPC	ER-2016-0023	Rebuttal: Rate Design, Demand-Side Management, Low-Income Weatherization Surrebuttal: Demand-Side Management, Low-Income Weatherization, Monthly Bill Average

Missouri American Water	OPC	WR-2015-0301	Direct: Consolidated Tariff Pricing / Rate Design Study Rebuttal: District Consolidation/Rate Design/Residential Usage/Decoupling Rebuttal: Demand-Side Management (DSM)/ Supply-Side Management (SSM) Surrebuttal: District Consolidation/Decoupling Mechanism/Residential Usage/SSM/DSM/Special Contracts
Working Case: Decoupling Mechanism	OPC	AW-2015-0282	Memorandum: Response to Comments
Rule Making	OPC	EW-2015-0105	Missouri Energy Efficiency Investment Act Rule Revisions, Comments
Union Electric Company d/b/a Ameren Missouri	OPC	EO-2015-0084	Triennial Integrated Resource Planning Comments
Union Electric Company d/b/a Ameren Missouri	OPC	EO-2015-0055	Rebuttal: Demand-Side Investment Mechanism / MEEIA Cycle II Application
The Empire District Electric Company	OPC	EO-2015-0042	Integrated Resource Planning: Special Contemporary Topics Comments
KCP&L Greater Missouri Operations Company	OPC	EO-2015-0041	Integrated Resource Planning: Special Contemporary Topics Comments
Kansas City Power & Light	OPC	EO-2015-0040	Integrated Resource Planning: Special Contemporary Topics Comments
Union Electric Company d/b/a Ameren Missouri	OPC	EO-2015-0039	Integrated Resource Planning: Special Contemporary Topics Comments
Union Electric Company d/b/a Ameren Missouri	OPC	EO-2015-0029	Ameren MEEIA Cycle I Prudence Review Comments
Kansas City Power & Light	OPC	ER-2014-0370	Direct (Revenue Requirement): Solar Rebates

Rule Making	OPC	EX-2014-0352	Net Metering and Renewable Energy Standard Rule Revisions, Comments
The Empire District Electric Company	OPC	ER-2014-0351	Rebuttal: Rate Design/Energy Efficiency and Low-Income Considerations
Rule Making	OPC	AW-2014-0329	Utility Pay Stations and Loan Companies, Rule Drafting, Comments
Union Electric Company d/b/a Ameren Missouri	OPC	ER-2014-0258	Direct: Rate Design/Cost of Service Study/Economic Development Rider Rebuttal: Rate Design/ Cost of Service/ Low Income Considerations Surrebuttal: Rate Design/ Cost-of-Service/ Economic Development Rider
KCP&L Greater Missouri Operations Company	OPC	EO-2014-0189	Rebuttal: Sufficiency of Filing Surrebuttal: Sufficiency of Filing
KCP&L Greater Missouri Operations Company	OPC	EO-2014-0151	Renewable Energy Standard Rate Adjustment Mechanism (RESRAM) Comments
Liberty Natural Gas	OPC	GR-2014-0152	Surrebuttal: Energy Efficiency
Summit Natural Gas	OPC	GR-2014-0086	Rebuttal: Energy Efficiency Surrebuttal: Energy Efficiency
Union Electric Company d/b/a Ameren Missouri	OPC	ER-2012-0142	Direct: PY2013 EM&V results / Rebound Effect Rebuttal: PY2013 EM&V results Surrebuttal: PY2013 EM&V results Direct: Cycle I Performance Incentive
Kansas City Power & Light	Missouri Public Service Commission Staff	EO-2014-0095	Rebuttal: MEEIA Cycle I Application <u>testimony adopted</u>
KCP&L Greater Missouri Operations Company	Missouri Division of Energy (DE)	EO-2014-0065	Integrated Resource Planning: Special Contemporary Topics Comments
Kansas City Power & Light	DE	EO-2014-0064	Integrated Resource Planning: Special Contemporary Topics Comments

The Empire District Electric Company	DE	EO-2014-0063	Integrated Resource Planning: Special Contemporary Topics Comments
Union Electric Company d/b/a Ameren Missouri	DE	EO-2014-0062	Integrated Resource Planning: Special Contemporary Topics Comments
The Empire District Electric Company	DE	EO-2013-0547	Triennial Integrated Resource Planning Comments

A Look at Your New Bill



At Ameren Illinois, we're committed to giving you the tools you need to use energy safely and efficiently. Your new bill statement puts the information you need – and the power to control your energy use – right in your hands. It's packed with new features that make it easier to find the information you need, because it was made with you in mind. For more information about your new bill, please visit us at AmerenIllinois.com/NewBill.

Account Number 1234567890
Customer Name John Smith
Service Address 123 Main Street
Anywhere, IL 45678

f t AmerenIllinois.com
Customer Service 1.800.755.5000

Statement Issued 09/25/2015
Total Amount Due **\$106.34**
Due Date Oct 16, 2015

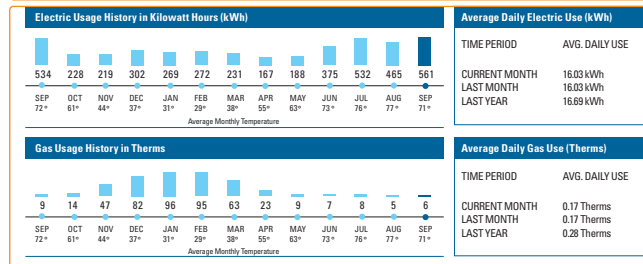
Last Payment **\$94.90**
Payment received. Thank you.

Current Charge Summary for Statement 09/25/2015

Total Electric Charge	\$80.34
Total Gas Charge	\$26.00
Subtotal Current Charges	\$106.34
Total Amount Due	\$106.34

Important Account Messages

You're in control with Budget Billing. Your energy payments will be predictable. Avoid surprises, and gain peace of mind. Enroll in Budget Billing Settlement Program by sending only \$76.00. Payment must be received by the due date on this bill.



See page 2 for account messages and tips from Ameren Illinois.

Keep this portion for your records.

Page 1 of 4

Please detach stub and return this portion with your payment.

See reverse side if your address has changed and for details on other ways to pay your bill.

John Smith
123 Main Street
Anywhere, IL 45678

Account Number 1234567890
Total Amount Due **\$106.34**
Due Date 10/16/2015

Amount Enclosed _____

AMEREN ILLINOIS
PO BOX 88034
CHICAGO, IL 60680-1034

The first thing you'll see on your new bill statement is that we've made it easier to find the amount due and the due date. Your account number is easy to locate as well as the service address for which this bill was issued.

Your Current Charge Summary is where you'll see the individual amounts for services like gas and electric and additional charges or prior amounts due for this month. To the right is where you'll see important information about your account.

You'll also see that we've made it easy to compare energy usage over time, so you can compare last month or last year, and see everything in between. You can even find the average temperature for that month.

The bill stub is now located at the bottom of the bill statement, so if you're paying by mail you can easily tear off this section and send it in with your payment.

On the back side of the first page, you'll find more important messages. You can read about ways we're supporting our community, where to find out more about updates to our energy delivery system, and directions to resources you can use to make sure you're using energy safely and efficiently. You can also find the variety of ways to pay your bill or update your mailing address.

GM-2

1/4

The bill statement shown here is based on a sample electric bill; however the sections are the same for our natural gas customers.

Your bill statement is grouped into easy to read sections about Payment Details, Service Billing Details, Supplier Details and Additional Charges.

The Service Billing Detail section identifies the billing Rate Zone, as well as itemized charges and calculations needed to arrive at the total for the billing period.

1 Read Type:

Defines the type of measurement used to determine your energy usage. Electric usage is measured in kilowatt hours (kWh). Natural gas usage is measured in therms.

2 Meter Number:

This is a unique identification number which matches the number on the meter/registering device at the service location.

3 Current Meter Read:

The numerical values obtained from the current meter reading.

4 Previous Meter Read:

The numerical values obtained from the previous meter reading.

5 Read Difference:

This amount is the difference between the current meter read value and the previous meter read value.

6 Multiplier:

Most residential meters have a multiplier of one. Customers who use a large amount of electricity and/or natural gas may have a multiplier greater than one which allows the meter to register a specific amount of usage before moving the meter dial.

7 Usage: Displays the total amount of energy used.

8 Usage Summary: The total electric and/or natural gas usage for the current billing period.

9 Electric and/or Natural Gas Delivery:

As a delivery company, Ameren Illinois is responsible for the transmission and distribution infrastructure that moves electricity and/or natural gas from the wholesale grid to your door. Delivery service charges allow us to construct, maintain and improve the system that serves you and to respond around the clock to restore service when it is interrupted.

10 Electric and/or Natural Gas Supply:

While delivery service represents the wires, pipes and services that bring energy from its source to you, supply refers to the electric and/or natural gas supplied from the wholesale markets.

11 Taxes and Other Fees:

This area includes taxes and other fees we collect for the state, municipality or county based on the amount of energy used.

12 Retail Electric Supplier (RES):

If you receive your electric supply from a RES, the supplier's name, website, phone number and messages can be seen here. Please refer questions relating to Electric Supply charges to your supplier.



AmerenIllinois.com
Customer Service 1.800.755.5000

Statement Issued 09/25/2015
Total Amount Due **\$106.34**
Due Date Oct 16, 2015

Account Number 1234567890
Customer Name John Smith
Service Address 123 Main Street
Anywhere, IL 45678

Payment Details

	DATE	AMOUNT
Payment Received	September 14, 2015	\$ 94.90

Electric Service Residential Billing Detail - Rate Zone III

08/20/2015 -

Electric Meter Read for 08/20/2015 - 09/24/2015 (35 days)

READ TYPE	METER NUMBER	CURRENT METER READ	PREVIOUS METER READ	READ DIFFERENCE	MULTIPLIER	USAGE
Total kWh 1	12345678 2	39205.0000 Actual 3	38644.0000 Actual 4	561.0000 5	1.0000 6	561.0000 7

Usage Summary

Total kWh 8	561.0000	Summer kWh	561.0000
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	CHARGE DESCRIPTION	USAGE	UNIT	RATE	CHARGE
Electric Delivery	Customer Charge				\$ 11.32
	Ameren Illinois Meter Charge				\$ 4.79
	DS-1 Residential Distribution Delivery Charge Summer	561.00	kWh	@ \$ 0.04552000	\$ 25.54
	Delivery Electric Environmental Adjustment	561.00	kWh	@ \$ 0.00093340	\$ 0.52
	Service Energy Efficiency Demand Response	561.00	kWh	@ \$ 0.00366000	\$ 2.05
Electric Delivery					\$ 44.22

Electric Supply 10	Purchased Electric Summer	561.00	kWh	@ \$ 0.05031000	\$ 28.22
	Ameren Illinois Purchased Electricity Adjustment	561.00	kWh	@ \$-0.00135113	\$-0.76
	BGS-1 Basic Generation Energy Efficiency Demand Response	561.00	kWh	@ \$ 0.00163000	\$ 0.92
	Service Transmission Service Charge	561.00	kWh	@ \$ 0.00772000	\$ 4.33
Electric Supply					\$ 32.71

Taxes and Other Fees 11	Municipal Tax				\$ 0.78
	Illinois State Electricity Excise Tax				\$ 1.85
	EDT Cost Recovery				\$ 0.78
Total Tax Related Fees					\$ 3.41

Total Electric Charges **\$ 80.34**



Details From Your Electric Supplier **12**

For more information about your electric supply choices, visit www.pluginIllinois.org.

Common Terms and Definitions

Following are definitions for some of the most common terms which may appear on a residential or non-residential natural gas, electric or lighting bill statement.

Delivery Charges

Customer Charge: Recovers costs of providing energy service that occurs even if no energy is used in the billing period. Included in the charge are billing, customer support and other supplemental charges. For gas service, this also recovers basic gas metering costs.

Distribution Delivery Charge: Recovers the costs of infrastructure, maintenance and services incurred by the utility to deliver energy to customers through the distribution system.

Electric Environmental Adjustment (Rider EEA): Recovers costs incurred by the utility for environmental clean-up of former gas manufacturing sites.

Energy Efficiency Demand Response (Rider EDR): Recovers costs, fees, and charges for energy efficiency programs and demand response measures to help customers use electricity more efficiently.

Gas Energy Efficiency Cost Recovery Chg (Rider GER): Recovers costs, fees, and charges for energy efficiency programs to help customers use natural gas more efficiently.

Gas Environmental Adjustment (Rider GEA) or Recovery of Coal Tar Costs (Rider TAR): Recovers costs incurred by the utility for environmental clean-up of former gas manufacturing sites.

Lighting Charge: Recovers costs of providing Optional Outdoor Protective Lighting service for a specific location.

Meter Charge: Recovers the basic costs of providing electric metering services if they are provided by the utility.

Qualifying Infrastructure Plant Surchg (Rider QIP): Recovers costs incurred by the utility for certain natural gas infrastructure improvements.

Supply Charges

Purchased Electric: Recovers the cost of electricity the utility purchases from suppliers and delivers to customers. The utility receives no profit from this charge.

Purchased Electricity Adjustment: Allows the utility to match electric power and energy costs with electric power and energy revenue.

Purchased Gas Adjustment Charge (Rider PGA): Recovers the cost of natural gas the utility purchases from suppliers and delivers to customers. The utility receives no profit from this charge.

Supply Cost Adjustment (Rider PER): Base cost associated with electric power and energy used by Basic Generation Service (BGS) customers. This rider is also used to apply charges incurred by the utility to bring in electric power and energy for customers served under Real Time Pricing (Rider RTP) and Power Smart Pricing (Rider PSP).

Transmission Service Charge: Recovers costs associated with electric transmission service.

Taxes and Other Terms

Billing Seasons: Only applies to electric billing. Summer electric rates are effective June 1 – September 30. Non-Summer electric rates are effective October 1 – May 31.

Budget Billing: A free billing option that levels out energy spending by spreading the impact of peak usage over 12 months. Any difference between the actual usage and the amount billed is reflected as a “Budget Bill Adjustment” on the bill.

EDT Cost Recovery: Allows the utility to recover the cost of an electric distribution tax imposed on the utility under the Public Utilities Revenue Act.

Illinois State Commerce Commission Tax: State tax on natural gas usage; proceeds are used to support operations of the state agency charged with regulating the utility.

Illinois State Electricity Excise Tax: State tax on electricity usage.

Illinois State Gas Revenue Tax: State tax on natural gas usage.

Late Payment Charge: A 1.5 percent (1% for government accounts) Late Payment Charge will be applied to any unpaid balance after the due date.

Municipal Tax or Municipal Gross Revenue: Tax imposed by a local municipality that the utility is required to collect.

**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 Increase) Case No. ER-2016-0179
Its Revenues for Electric Service)

PUBLIC COUNSEL DATA REQUESTS 2129-2162 TO AMEREN MISSOURI

The Office of Public Counsel (Public Counsel) hereby provides the following Data Requests to Ameren Missouri pursuant to the Commission's Rule 4 CSR 240-2.090. Public Counsel is requesting Union Electric Co. d/b/a Ameren Missouri ("Ameren Missouri" or "Company") to respond to these requests within twenty (20) days of receipt. Please provide electronic responses to the following: opcservice@ded.mo.gov.

DEFINITIONS

As used herein, the words "document" or "documents" include any original and all copies of any written, printed, typed, electronically stored, or graphic matter of any kind or nature, however produced or reproduced, now in your possession, custody or control, or in the possession, custody or control of your agents, representatives, employees of you or any and all persons acting in your behalf, including documents at any time in the possession, custody or control of such individuals or entities, or known by you to exist.

DATA REQUESTS

- 2129. Please provide the process employed as to how the Company determined what to include on its bill as well as how it is currently formatted. Additionally, please indicate how long the present format has been in place.

- 2130. Is there a difference in formatting or presentation of a bill between rate classes?

- 2131. Please provide sample bill copies of each customer class.

2132. Was the Company bill design conducted in-house or by a third-party? If the latter, please provide the name and whether a competitive bid process was used to select the designer.
2133. What portion of the retail customer base (by rate classification) has requested electronic billing over the last three years? Please provide a breakdown in overall numbers as well as percentages within each class relative to the class as a whole (e.g., 10% of residential utilize paperless).
2134. How do you educate your customers on the various ways to pay their bills, especially if the customer is receiving electronic billing?
2135. Is the format of the electronic bill the same as the format of the paper bill? If not, how do they differ? If not, why are they different?
2136. When a customer asks for an explanation of various charges on the bill, does the Company have a standard, scripted explanation? If so, please provide a copy of the script.
2137. Please provide a two-year breakdown on all reported complaints to your call center, customer service centers, walk-ins, etc... Complaints should be categorized according to the Company's preferred in-house designation (e.g., billing, power failure, faulty meter, etc...).
2138. What is the most frequent reported complaint about billing in your call center, customer service centers, walk-ins, etc?
2139. What are the five billing issues consumers have most frequently contacted the utility about over the past three years? How do billing inquiries compare to all other inquiries received?
2140. Do all Company bills for service show the volumetric (unit) rate and monthly customer (flat) charge? If not, please explain why and is that information available to customers on request.
2141. Does the Company place information about payment options on the bill? If so, are they easy to find on the bill?
2142. Please list any and all actions taken to communicate to customers in general (e.g., quarterly bill inserts) about their monthly bills over the past year.

2143. What physical location options are available for customers to make in-person payments and what consumer educational materials are offered at those locations (if any)?
2144. Please provide a narrative explanation as to how the Company educates consumers on their bill and/or through any other channel of the following:
- i. New rates
 - ii. Trackers
 - iii. The FAC and its changes
 - iv. The MEEIA surcharge and its changes
 - v. The RESRAM surcharge and its changes
 - vi. The ISRS surcharge and its changes
 - vii. Fixed charges
 - viii. Consumption usage (e.g., declining blocks—the more you use the less it costs).
 - ix. Customer Charge
 - x. Other
2145. If the Company issues a single bill for multiple services (electric and gas), how do you communicate to the customers about partial payments or how to apply a payment to only one utility service on that bill?
2146. Does the Company use bills to communicate energy efficiency methods and information? Additionally:
- i. How does the Company communicate energy efficiency methods and information when the consumer is receiving an electronic bill?
 - ii. How often does the Company communicate about energy efficiency programs?
2147. Does the Company utilize a behavioral modification energy usage report? If yes, please answer the following:
- i. Is the energy usage report included with the monthly bill? If separate, please explain why.
 - ii. Are paperless billing homes eligible for MEEIA-sponsored home energy usage reports?
 - iii. Can a consumer request to have a MEEIA-sponsored home energy usage report?
 - iv. Please provide a sample of the Company's MEEIA-sponsored home energy usage report.

2148. Does the Company provide a new customer with additional educational information about the bill's makeup?
2149. Of those receiving an electronic bill, what percentage actively look at their online account for detailed information about their bill?
2150. What are the benefits from the Company's perspective, of electronic billing?
2151. Please provide the percentage of late payments of electronic bills relative to paper bills on a monthly basis for the past year?
2152. Has the Company taken any actions to alleviate perceived concerns of identity theft related to paperless billing? If yes, please provide a narrative explanation.
2153. What actions does the Company take to provide customers advance notice of rate changes? Specifically, post-Commission approved rate increase.
2154. What actions are taken on a bill to indicate that the usage estimate is actual or estimated?
2155. For consumers on payment arrangements, is that displayed on the bill? How?
2156. For consumers on budget billing, is the balance clearly noted? Additionally:
i. What percentages of customers are on budget billing?
ii. Does the communication about the details on the bill differ for those who are on budget billing?
2157. Do you offer simple or detailed billing in Spanish? Bosnian? Or other language versions?
2158. How many non-English speaking calls were received this past year? Please provide a breakdown by language.
2159. For those consumers who request detailed bills, is there additional effort in explaining the lists of costs such as trackers, surcharges, etc?
2160. What are the ways the Company communicates disconnect notices (bills, inserts, separate mailings, text message, phone call, etc)?

2161. Has the Company conducted any research or hired third-parties to conduct research involving focus groups or surveys of Company specific-ratepayer perspectives involving the Company's billing education, format, and process? If yes, please provide any and all examples over the past five years. Please indicate whether said research was centered on billing that paper, paperless, or both.
2162. Regarding OPC-DR 2161, if a focus group was selected, what criteria were utilized?

Issued 12/5/2016