

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

In the Matter of the Proposed	)	
Commission Rule 20 CSR 4240-10.035	)	
Residential Advanced Meter or Hub	)	File No. OX-2026-0045
Meter Opt-Out.	)	

**REVISED COMMENTS OF UNION ELECTRIC COMPANY d/b/a AMEREN
MISSOURI**

COMES NOW Union Electric Company d/b/a Ameren Missouri ("Ameren Missouri" or "Company"), and for its Comments on the draft rules subject to this proceeding, states as follows:

1. On August 27, 2025, the Missouri Public Service Commission ("Commission") issued a *Finding of Necessity and Order Directing Proposed Rule 20 CSR 4240-10.035 be Filed for Publication*. On August 28, 2025, a draft of the proposed rule was filed with the Secretary of State. 20 CSR 4240-10.035 is designed to provide additional guidelines for the implementation of Section 386.820 which recently became effective as part of Senate Bill 4.
2. On September 5, 2025, the Commission issued its *Notice of Hearing and Comment Period*, establishing a hearing on November 13, 2025, regarding the proposed 20 CSR 4240-10.035.
3. On October 1, 2025, the draft rules were published in the Missouri Register, with a date for submission of comments to the Commission of November 5, 2025.
4. Ameren Missouri appreciates the efforts that the Commission and Missouri Public Service Commission Staff ("Staff") have taken to create additional guidelines for the implementation of Section 386.820. In these comments, Ameren Missouri will provide

guidance to further reflect additional areas that could require further clarification and that might be further refined to reflect operational considerations.

5. 20 CSR 4240-10.035(3)(A)2a. Subsection 2a. of the proposed rule states, "[t]he utility may propose a single monthly fee for all customers using a traditional meter, or it may propose separate monthly fees for customers who elect to self-read the traditional meter and for those whose meters are read by the utility. **In no event shall a utility assess more than one monthly fee per account for the use of a traditional meter.**" *Emphasis added.* Section 386.820, however, provides that "[a] utility may charge a monthly fee, not to exceed fifteen dollars, for the use of a traditional meter." The last sentence of the proposed rule differs slightly from the statute in that the statute requires the charge be tied to a traditional meter rather than the account. For electric and gas customers, the account will have two meters and it is not clear how the revenue would be allocated between the two accounts. The Company suggests striking the last sentence of subsection 2 to eliminate any confusion. Accordingly, Ameren Missouri recommends that the following be stricken:

The utility may propose a single monthly fee for all customers using a traditional meter, or it may propose separate monthly fees for customers who elect to self-read the traditional meter and for those whose meters are read by the utility. ~~In no event shall a utility assess more than one monthly fee per account for the use of a traditional meter.~~

6. 20 CSR 4240-10.035(3)(A)3. It is unclear whether the interest rate percentage is applicable to the unpaid amount due to inaccurate or failed reporting, or to the total bill. It is also unclear whether the percentage is calculated one time or each month and whether it is compounded. In most cases, the utility will be unable to determine the time period during which any underbilling occurred.

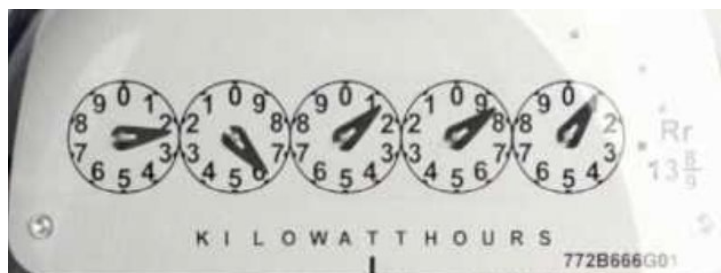
7. 20 CSR 4240-10.035(4). Ameren Missouri wishes to thank the Commission and its Staff for the inclusion of this provision in the rule. The Company already is purchasing its traditional meters from a company that provides refurbished equipment because it is the only viable supply, but it is also a supply that will not last. Eventually, the supply of refurbished equipment will dwindle. Knowing that the Commission and Staff have contemplated this inevitability is encouraging.

8. 20 CSR 4240-10.035(5)(A) and (B) (generally). Ameren Missouri will certainly provide a detailed description to its customers regarding how to read meters. However, we do anticipate a high degree of errors initially from those electing to self-report. We anticipate that we will need to closely monitor the usage of opt-out customers for the initial periods because of the complexity of analog meters.

For example, if you are reading an Ameren Missouri analog electric meter, you write down the figures in left-to-right order. Record the number that the pointer just passed (in other words, the lower number, although "0" will be considered *higher* than "9" but *lower* than "1").



The dials in this example would read 18917 kWh. You would then subtract your prior reading from this one to determine your usage.



This, however, is much closer to what an analog meter actually looks like rather than the illustration above. In this case, it would read 26180 kWh. The pointer is often in a difficult spot, you will have glare on the screen, and you have to remember that the pointer has to pass the number. With the pointers often still moving when the meter reading is accomplished, this can be further disjuncting, adding to the difficulty and potential uncertainty.

9. 20 CSR 4240-10.035(5)(A) and (B). For customer self-reading to be effective, it has to occur at regular, very reliable intervals. Billing cycles cannot be held up because the utility receives a late meter reading. Ameren Missouri therefore suggests two clarifications to this could help alleviate future issues: remove the postal service as a means for the provision of meter reading, and note that meter readings received late will result in estimated bills.

Ameren Missouri understands why the draft rule points to 20 CSR 4240-13.020 as a possibility for a way for customers to supply readings. That provision specifically notes mail (specifically postcards) as a possibility, but was also intended to cover the occasional time when the utility itself was not able to provide the reading. The mail can hold issues for a more regular process. There can be mail delays - the lost or damaged pieces of post, etc.

Whether it's because of postal service delays or the customer forgetting and providing the readings late, Ameren Missouri knows that customers are dissatisfied when they provide readings the Company cannot use. Ameren Missouri strongly suggests that calling features or web portals would be a much more effective way to handle customer meter reading, and that specifically calling out that untimely provision of meter readings

will result in estimated readings, will help alleviate any confusion. Ameren Missouri therefore recommends that the following provisions be changed accordingly:

(A) Each utility shall provide the customer with a detailed process to report meter readings by telephone or other commercially reasonable means. A utility may additionally offer reporting through a secure website, but will not be required to accept meter readings through the postal service.

(B) If a customer elects to supply meter readings, the customer shall timely report accurate usage to the utility once per billing cycle. Meter readings provided outside of the time period stated by the utility in order to stay within the billing cycle will result in an estimated bill.

WHEREFORE, for the foregoing reasons, the undersigned respectfully requests that the Commission accept these revised comments for consideration in determining the next steps regarding the proposed rule revisions.

Respectfully submitted,

UNION ELECTRIC COMPANY
d/b/a AMEREN MISSOURI

/s/ Paula N. Johnson

Paula N. Johnson, # 68963
Senior Corporate Counsel
P.O. Box 66149, MC 1310
St. Louis, MO 63166-6149
(314) 861-3220 (phone)
(314) 554-4014 (fax)
AmerenMOService@ameren.com

CERTIFICATE OF SERVICE

I hereby certify that copies of the foregoing have been emailed to the parties of record on this 6th day of November, 2025:

/s/ Paula N. Johnson

Paula N. Johnson