

# Exhibit No. 127

*Exhibit No.:*  
*Issue(s):* *Quality of Service*  
*Witness:* *Sarah Fontaine*  
*Sponsoring Party:* *MoPSC Staff*  
*Type of Exhibit:* *Surrebuttal Testimony*  
*Case No.:* *ER-2022-0337*  
*Date Testimony Prepared:* *March 13, 2023*

**MISSOURI PUBLIC SERVICE COMMISSION**  
**FINANCIAL AND BUSINESS ANALYSIS DIVISION**  
**CUSTOMER EXPERIENCE DEPARTMENT**

**SURREBUTTAL TESTIMONY**

**OF**

**SARAH FONTAINE**

**UNION ELECTRIC COMPANY,  
d/b/a AMEREN MISSOURI**

**CASE NO. ER-2022-0337**

*Jefferson City, Missouri*  
*March 2023*



1 **CUSTOMER BILLING ISSUES**

2 Q. Ameren Missouri witness Wills states that customer billing issues were related  
3 to new business processes that were implemented with the roll out of AMI meters, and the mass  
4 application of TOU rates that were being billed using interval data. Mr. Wills also states that  
5 Ameren Missouri worked through those issues. Would you agree?

6 A. I would agree that the customer billing issues were related to those items.  
7 I would also note that Ameren Missouri continues to work through those issues and it is still to  
8 be seen how quickly and to what degree these issues will be fully remediated. Staff intends to  
9 closely monitor the process.

10 Q. In your direct testimony, you mention that Ameren Missouri stated that its goal  
11 is to eliminate these billing issues within the December 2022 timeframe. Does Ameren Missouri  
12 witness Wills indicate in his rebuttal testimony that the issues have been eliminated as of the  
13 date of his filing on February 15, 2023?

14 A. No. Mr. Wills states in his rebuttal testimony that “based on the last report  
15 available to me, the number of customers receiving estimated bills for more than three  
16 consecutive billing periods had fallen by 42% from its peak level experienced earlier in 2022.  
17 “No bills” aged 30 days or more had fallen by 95% since their 2022 peak.”<sup>2</sup> Staff is unclear as  
18 to when the report Mr. Wills referenced was created. However, to the best of Staff’s knowledge,  
19 the billing issues continue to occur but are steadily improving.

20 Q. In witness Wills’ rebuttal testimony, he suggested a couple of modifications to  
21 the recommendations made in your direct testimony. Please explain the modification regarding  
22 estimated bill reporting. Do you agree with this modification?

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<sup>2</sup> Steven M. Wills Rebuttal Testimony, Page 21, lines 10-13.

1           A.     On pages 21 and 22 of Mr. Wills' testimony he discusses Staff's  
2 recommendation that Ameren Missouri incorporate estimation data into the monthly reports  
3 provided to the Commission's Customer Experience Department Staff. Specifically, Staff  
4 recommended that Ameren Missouri provide the number of customers with three or more  
5 estimated bills in its monthly reports. Mr. Wills states that he recommends the report include  
6 "number of customers with more than three *consecutive* estimated bills."<sup>3</sup> Staff agrees with  
7 Mr. Wills and recommends that reporting should be sent to Customer Experience Department  
8 Staff on a monthly basis. Reports should include both the total number of estimated bills for  
9 each month as well as the total number of customers who have had three or more consecutive  
10 estimated bills for each month.

11           Q.     Does witness Wills discuss any other changes to your recommendations in your  
12 direct testimony? If so, do you agree?

13           A.     He does. In my direct testimony, I recommend that Ameren Missouri incorporate  
14 monthly "no bill" statement data into the monthly reports provided to Commission Staff.  
15 Specifically, I ask that it provide the number of customers billed outside of the 24-35 days as  
16 required by Commission rule<sup>4</sup>. The reason this data is requested is because during Staff's  
17 investigation of the referenced "no bill" situations, it was found that several customers received  
18 bills for longer than the allowable billing period or customers failed to be issued a bill for one  
19 or more months which resulted in receipt of a bill which included several billing periods  
20 combined into the same single bill.

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<sup>3</sup> Steven M. Wills Rebuttal Testimony, page 22, lines 5-6.

<sup>4</sup> 20 CSR 4240-13.015(1)(C) states "billing period means a normal usage period of not less than twenty-six (26) nor more than thirty-five (35) days for a monthly billed customer..."

1           In Mr. Wills’ rebuttal testimony he states that Staff’s request for a count of  
2 customers billed outside of the 24-35 days as required by Commission rules slightly misses the  
3 issue the Company experienced that was described as “no bills”. However, Staff would still  
4 characterize a bill not being timely issued, therefore resulting in more than one “billing period”  
5 included on the same bill, as a “no bill” situation. Even if those billing periods have been broken  
6 down into 24-35 day increments within the bill, the customer is still receiving a bill for service  
7 which includes more than 35 days at one time.

8           Mr. Wills’ rebuttal testimony recommends changing what is reported to Staff to  
9 reflect the number of customers that have not been billed within 30 days of the close of their  
10 billing period. He states, “there are some valid operational reasons that some bills occasionally  
11 may take several days after the billing period closes to process.”<sup>5</sup> Staff is agreeable to this  
12 approach; however, Staff would like to further recommend that when Ameren Missouri submits  
13 this reporting it should include detailed information if there are operational reasons, as  
14 referenced by Mr. Wills, which have caused the bill to be issued outside of the 30 day window  
15 along with a statement of what plans are in place to address these circumstances.

16           Q.     Does this conclude your surrebuttal testimony?

17           A.     Yes it does.

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<sup>5</sup> Steven M. Wills Rebuttal Testimony, page 22, lines 22-23.

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-2022-0337

**AFFIDAVIT OF SARAH FONTAINE**

STATE OF MISSOURI        )  
  )  
COUNTY OF COLE         )        ss.

**COMES NOW SARAH FONTAINE** and on her oath declares that she is of sound mind and lawful age; that she contributed to the foregoing *Surrebuttal Testimony of Sarah Fontaine*; and that the same is true and correct according to her best knowledge and belief.

Further the Affiant sayeth not.

Sarah Fontaine  
SARAH FONTAINE

**JURAT**

Subscribed and sworn before me, a duly constituted and authorized Notary Public, in and for the County of Cole, State of Missouri, at my office in Jefferson City, on this 8<sup>th</sup> day of March 2023.

D. Suzie Mankin  
Notary Public

D. SUZIE MANKIN  
Notary Public - Notary Seal  
State of Missouri  
Commissioned for Cole County  
My Commission Expires: April 04, 2025  
Commission Number: 12412070