

**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.) **File No. ER-2022-0337**

**POSITION STATEMENTS OF
THE CONSUMERS COUNCIL OF MISSOURI**

COMES NOW the Consumers Council of Missouri (“Consumers Council” or “CCM”), and hereby submits its position statements on the following issues from the List of Issues filed on March 22, 2023 in this case. On all other issues, the Consumers Council adopts the position taken by the Office of the Public Counsel.

4. Class Cost of Service, Revenue Allocation, Rate Design and Rate-Switching Tracker.

A. How should production costs be allocated among customer classes within a Class Cost of Service Study?

Consumers Council Position: *Consumers Council has no position on this issue at this time, but may take one later.*

B. How should distribution costs be allocated among customer classes within a Class Cost-of-Service Study?

Consumers Council Position: *Consumers Council has no position on this issue at this time, but may take one later.*

C. Which party's Class Cost of Service Study should be used in this case and used as a starting point for the non-residential rate design working case agreed to by the parties to the Company's last electric general rate case, File No. ER-2021-0240?

Consumers Council Position: *The Commission should use its Staff's class cost-of-service study.*

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

Consumers Council Position: *The Commission should not order any revenue neutral shift across classes and any rate increase should be enforced as an equivalent percentage increase across all classes with the exception of the company-owned lighting rates should remain constant.*

E. What should the customer charges associated with the Residential Class rate plans be?

Consumers Council Position: *A \$9.00 customer charge is appropriate and supported by the Commission's Staff's Class Cost-of-Service Study. There is no compelling justification to raise this unavoidable fixed fee. It is important to keep this fee low in order to protect low usage customers, many of whom are vulnerable customers. Keeping the customer charge from rising as a result of this case will also provide greater rewards to those customers who engage in energy efficiency*

and energy conservation measures, and it will give all residential consumers more control over their monthly bills.

- a. If the customer charges for the Ultimate Saver and Smart Saver Plans are discounted relative to other residential rate plans, should a minimum demand charge be imposed with customers to be fully educated on the minimum demand charge?

Consumers Council Position: *No. Demand charges are inherently difficult for residential consumers to grasp and can lead to bill shock.*

F. What changes should be made, if any, to the Residential rate plans offered by the Company?

Consumers Council Position: *The Residential Evening/Morning Savers should only be allowed as an “Opt-In” rate schedule for residential customers equipped with an AMI meter. No alternative rate plan should be imposed on residential customers without clear affirmative action by such customers adopting a new plan.*

- a. Should Staff's proposal to eliminate the Anytime (flat) rate option for any Residential customers who have an AMI meter be approved?

Consumers Council Position: *No.*

- b. What changes, if any, should be made to the deployment of residential ToU rate plans?

Consumers Council Position: *All alternative rate plans should be “opt In”. The “Evening/Morning Savers” rate schedule should be changed to “Daytime/Overnight” with “savers” being dropped from the current nomenclature to avoid customer confusion.*

- G. What changes should be made, if any, to the Non-Residential, Non- Lighting rate options offered by the Company?

Consumers Council Position: *Consumers Council has no position on these issues at this time, but may take one later.*

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- I. Should the Commission authorize Ameren Missouri to track some valuation of estimated revenue changes that may arise from residential customer rate switching? a. Is the Ameren Missouri requested method for calculating the tracker balance reasonable?

Consumers Council Position: *No. A tracker is not necessary for the Commission to order a rate modernization plan in this and in future cases consistent with the large capital investment made to enable TOU rates.*

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14. Low-Income and Other Customer Programs.

A. Should the changes to the Keeping Current/Keeping Cool Program proposed by CCM be approved?

Consumers Council Position: Yes. Funding for the Keeping Current/Keeping Cool Program should be increased to \$5 million, which would be shared equally by the ratepayers and shareholders, consistent with past precedent.

Keeping Current program changes should be ordered consistent with the direct testimony of Jackie Hutchinson, pp. 11-21, including an increase in the compensation for participating agencies to \$50 per successful application.

Ameren Missouri should also be ordered to develop a plan, in consultation with the Keeping Current collaborative, designed to reduce the number of involuntary residential disconnections by 10% in the 20 zip codes of the utility's service area which have the highest collection activity, over a 2-year period, or until the next Ameren Missouri general rate case (Hutchinson Direct, pp. 19-20; Hutchinson Rebuttal pp. 4-7).

B. Should the changes to the Keeping Current/Keeping Cool Program proposed by OPC be approved?

Consumers Council Position: Yes. The recommended program design and tariff changes are consistent with feedback from the Keeping Current Collaborative and accurately adjust for the dynamic changes Ameren Missouri's most vulnerable customers are currently experiencing (Marke Direct p. 31).

Respectfully submitted,

Dated: March 27, 2023

/s/ John B. Coffman

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CERTIFICATE OF SERVICE

I hereby certify that copies of the foregoing have been mailed, emailed or hand-delivered to all parties listed on the official service list on this 27th day of March 2023.

/s/ John B. Coffman
