

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

In the Matter of a Working Case to)
Consider Best Practices for Recovery of)
Past-Due Utility Customer Payments) File No. AW-2020-0356
After the COVID-19 Pandemic)
Emergency.)

CLARIFICATION TO STAFF REPORT

COMES NOW Union Electric Company d/b/a Ameren Missouri ("Ameren Missouri" or "Company") and in response to the *Staff Report* issued September 21, 2020, provides to the Missouri Public Service Commission ("Commission") this *Clarification to Staff Report* ("*Clarification*"). In clarification of the information it provided through discovery, Ameren Missouri states as follows:

1. On September 21, 2020, the Commission's Staff ("Staff") issued its *Staff Report* containing information in response to the *Order Directing Staff to Gather Information about Utility Disconnections* issued on August 19, 2020. In discovery, Ameren Missouri provided information regarding its electric disconnections, but did not provide full information regarding its natural gas disconnections. Additionally, the *Staff Report* indicated that the Company did not fully define certain aspects of the information it provided. In order to make sure the Commission's record is complete, Ameren Missouri has compiled the information contained in this pleading so that the *Staff Report* can be supplemented with additional information. The remainder of this pleading is organized as follows:

- I. Clarification of Information Regarding both Electric and Natural Gas Disconnections
- II. Clarification of Information Regarding Electric Disconnections
- III. Clarification of Information Regarding Natural Gas Disconnections

I. Clarification of Information Regarding both Electric and Natural Gas Disconnections

2. Page 4 of the *Staff Report* notes that Ameren Missouri did not indicate how it defined "past-due" in the provision of its information. The Company defines "past due" as more than 30 days from the date the bill is issued, for both natural gas and electric customer accounts.

II. Clarification of Information Regarding Electric Disconnections

3. Page 24 of the *Staff Report* indicates that Ameren Missouri did not provide an estimated monthly breakdown of the anticipate disconnections from September 2020 through February 2021. These estimates are as follows:

Month	Estimated Disconnections
September	9,000
October	9,000
November	7,000
December	5,000
January	5,000
February	7,190

III. Clarification of Information Regarding Natural Gas Disconnections

4. Ameren Missouri provides the following information, consistent with its updated response to a data request submitted too late to be included in the *Staff Report*. This information is broken out by questions, as presented in data requests and referenced in the *Staff Report*.

Questions 1(a) & 3(a) – The number of disconnections for non-payment of services as of each month-end, and the same information for the August 2019 through February 2020 billing cycles / August 2019 through February 2020:

Month	Disconnections
Question 3(a)	
August 2019	175
September 2019	170
October 2019	131
November 2019	11
December 2019	26
January 2020	41
February 2020	1
Question 1(a)	
July 2020	0
August 2020	83

Questions 1(b) – The number of customers with past-due accounts as of each month-end, with an explanation of the criteria used by your company to define "past-due":

Month	Past-Due Accounts*
Question 3(b)	
August 2019	1,328
September 2019	1,334
October 2019	1,405
November 2019	1,264
December 2019	1,348
January 2020	1,341
February 2020	1,533
Question 1(b)	
July 2020	1,419
August 2020	1,584

*For the definition of "past-due," please see Paragraph 2 above.

Question 1(c) – The number of customers who have received a final disconnection notice, but have not been disconnected for non-payment of services as of each month-end:

Month	Final Notice w/o Disconnection
Question 3(c)	
August 2019	419
September 2019	296
October 2019	321
November 2019	292
December 2019	415
January 2020	722
February 2020	864
Question 1(c)	
July 2020	4
August 2020	539

Question 1(d) – The number of customers at each month-end participating in payment plans:

Month	Customers on Pay Plans
Question 3(d)	
August 2019	6
September 2019	4
October 2019	7
November 2019	5
December 2019	24
January 2020	18
February 2020	33
Question 1(d)	
July 2020	1
August 2020	36

Question 2 – Please provide your company's estimate of the number of disconnections for non-payment of service for the six-month period of September 2020 through February 2021, with an explanation of the methodology and assumptions used to develop these projections.

Month	Estimated Disconnections
September	230
October	176
November	15
December	35
January	55
February	2

As with the estimate it provided for its electric customers, these projections are based on a 35% increase from last year since disconnection orders have increased by 35% over August 2019.

Respectfully submitted,

UNION ELECTRIC COMPANY,
d/b/a Ameren Missouri

/s/ Paula N. Johnson

Paula N. Johnson, # 68963
Senior Corporate Counsel
Ameren Services Company
P.O. Box 66149, MC 1310
St. Louis, MO 63166-6149
(314) 554-3533 (phone)
(314) 554-2514
(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 1st day of October, 2020.

/s/ Paula N. Johnson _____
Paula N. Johnson