

Exhibit No.:
Issue(s):
Witness/Type of Exhibit:
Sponsoring Party:
Case No.:

200
Billing Practices
Marke/Direct
Public Counsel
GR-2019-0077

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. GR-2019-0077

April 19, 2019

OPC Exhibit No. 200
Date 8-2-19 Reporter COJ
File No. GR-2019-0077



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

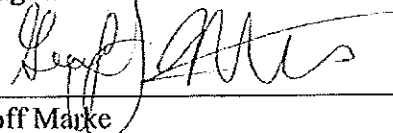
In the Matter of Union Electric)
Company d/b/a Ameren Missouri's)
Tariffs to Increase Its Revenues for) File No. GR-2019-0077
Natural Gas Service)

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.

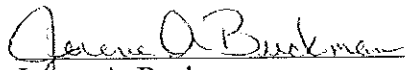


Geoff Marke
Chief Economist

Subscribed and sworn to me this 19th day of January 2019.



JERENA BUCKMAN
My Commission Expires
August 23, 2021
Cole County
Commission #13754037



Jerene A. Buckman
Notary Public

My commission expires August 23, 2021.

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DIRECT TESTIMONY
OF
GEOFF MARKE
UNION ELECTRIC COMPANY
d/b/a Ameren Missouri
CASE NO. GR-2019-0077

1 **I. INTRODUCTION**

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

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

5 **Q. What are your qualifications and experience?**

6 A. I have been in my present position with OPC since 2014 where I am responsible for economic
7 analysis and policy research in electric, gas, and water utility operations.

8 **Q. Have you testified previously before the Missouri Public Service Commission?**

9 A. Yes. A listing of the Commission cases in which I have previously filed testimony and/or
10 comments is attached in Schedule GM-1.

11 **Q. What is the purpose of your direct testimony?**

12 A. The purpose of this testimony is to recommend the Commission order Ameren Missouri to
13 modify its residential bill to be more transparent and to better inform customers of the type of
14 charges being assessed. This is also consistent with the Commission's residential billing rules;
15 and Ameren Missouri's current residential electric bill format.

16 **II. BILLING PRACTICES**

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

18 A. Ameren Missouri provides a one-page bill statement that contains select points of information
19 including one-year gas service details based on usage in cubic feet ("Ccf"), "some" of the
20 charge detail components, the amount due and due date, and various messages (energy

1 efficiency, safety, budget billing, Ameren Missouri community service metrics). A sample
 2 copy of the residential bill can be seen in Figures 1 and 2.

3 Figure 1: Side 1 of the sample Ameren Missouri Gas residential bill statement

Ameren MISSOURI
 Ameren payment processing center

- AmerenMissouri.com
- 1.800.552.7583
- PO Box 88068 Chicago, IL 60680-1068

FOCUSED ENERGY. For life.

Current Charge Detail for Statement 02/19/2019	
Gas Charge - Residential	\$456.61
Infrastructure Replacement Surcharge	\$0.00
Missouri Local Sales Tax	\$11.19
Columbia Municipal Charge	\$33.70
Natural Gas Rate Reduction	-\$8.91
Amount Due	\$492.59

AMOUNT DUE \$492.59

Due Date: 03/11/2019

Account Number
 Customer Name
 Service Address

Previous Statement \$253.02
 Last Payment - 02/13/2019 \$253.02
 P-PGA \$0.74069149 per CCF

Your natural gas interim rate reduction reflects operational efficiencies and the Federal Tax Rate Reduction.

Gas Service from 01/16/2019 - 02/14/2019 28 Days				
Meter Number	Current Reading	Previous Reading	Current Usage	Reading Type
003855	003291	564 CCF	Actual	

Gas Service Details February Statement

Gas Usage in Cubic Feet (CCF)

Month	Usage (CCF)	Average Monthly Temperature (°F)
Feb	~150	45°F
Mar	~100	36°F
Apr	~100	37°F
May	~100	29°F
Jun	~100	
Jul	~100	
Aug	~100	
Sep	~100	
Oct	~100	
Nov	~300	45°F
Dec	~300	36°F
Jan	~300	37°F
Feb	~300	29°F

Gas Usage Summary (CCF)

This shows how much gas you've used at this address

2018 368 CCF
 2019 341 CCF

Usage from Nov 2018 to Feb 2019


Saving Energy Pays Off.
 Purchase and install a high-efficiency natural gas furnace and get up to \$300 cash back. Save now and long into the future. Visit AmerenMissouri.com/NaturalGas for details and restrictions.

4

1 Figure 2: Side 2 of the sample Ameren Missouri Gas bill statement

Account Messages
A late payment charge of 1.5% will be added for any unpaid balance on all accounts after the due date.




Important Message for Gas Customers - Be Safe!
If you ever smell gas, leave the area and call Ameren Missouri at 1.800.552.7583 to investigate the problem. Before you dig, call 1.800.DIG.RITE to locate underground gas pipelines for you.

 **SPEEDPAY** offers 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.

Auto Pay Makes Paying Bills Easier. To enroll, go to AmerenMissouri.com or call 1.800.552.7583 to request an enrollment form.

You're in control with **Budget Billing**. Your energy payments will be predictable. Avoid surprises and gain peace of mind. Enroll in Budget Billing by sending only \$173.00. Payment must be received by the 'Due Date' on this bill.

USING OUR ENERGY TO STRENGTHEN OUR COMMUNITY. In 2018:

 <p>Our co-workers volunteered THOUSANDS of hours to help the communities where we live and work.</p>	 <p>With your help, we contributed MORE THAN \$470,000 to Dollar More to aid customers in Ameren Missouri's service territory with energy costs.</p>	 <p>Ameren Missouri donated more than \$1 MILLION for a better tomorrow.</p>
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Find out more about how we're making the communities we serve brighter at AmerenMissouri.com/Community.

Address Changes or Corrections

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. Finally, the purchase gas adjustment ("PGA") is not
4 listed in the "Current Charge Detail" but is instead listed to the right of that section under "Last
5 Payment." Figures 3 and 4 highlights the specific current charge details on Ameren Missouri's
6 bill statement.

7 Figure 3: Current & omitted charge details on Ameren Missouri's residential bill

Current Charge Detail for Statement 02/18/2019

Gas Charge - Residential	\$456.61
Infrastructure Replacement Surcharge	\$0.00
Missouri Local Sales Tax	\$11.19
Columbia Municipal Charge	\$33.70
Natural Gas Rate Reduction	-\$8.91
Amount Due	\$492.59

Omitted Charge Details:

- Customer Charge
- Usage ("Delivery") Charge
- Purchased Gas Adjustment
- Budget Bill Adjustment (if applicable)

8
9 Figure 4: Purchase Gas Adjustment--listed to the right of the current charge details

AMOUNT DUE \$492.59

Due Date: 03/11/2019

Account Number

Customer Name

Service Address

Previous Statement \$253.02

Last Payment - 02/13/2019 \$253.02

P-PGA \$0.74069149 per CCF

Purchase Gas Adjustment ("PGA")

The PGA is not listed under the "current charge details" but to the right of the bill under last payment.

Your natural gas interim rate reduction reflects operational efficiencies and the Federal Tax Rate Reduction.

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

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

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

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

6 **Q. Does the Commission historically value informed customers?**

7 A. Yes. The Commission's "Mission Statement" includes the important commitment to provide
8 the public information they need to make educated utility choices."¹

9 **Q. Does Ameren Illinois provide more or less information on residential customer bills as**
10 **Ameren Missouri?**

11 A. Ameren Illinois provides much greater bill transparency on its residential customers' bill.
12 Figure 5 is the representative Amercn Illinois gas bill sample listed on its website.

¹ Missouri Public Service Commission (2019) "About the PSC" https://psc.mo.gov/General/About_The_PSC

1 **Figure 5: Ameren Illinois Gas Usage Bill Summary²**



f t AmerenIllinois.com
 Customer Service 1.800.755.5000

Gas Service Residential Billing Detail - Rate Zone 1				08/06/2017 - 09/05/2017 (30 days)		
Gas Meter Read for 08/06/2017 - 09/05/2017 (30 days)						
READ TYPE	METER NUMBER	CURRENT METER READ	PREVIOUS METER READ	READ DIFFERENCE	MULTIPLIER	USAGE
Total Therms		2085.0000 Actual	2080.0000 Actual	5.0000	1.0000	5.0000
Usage Summary						
Total Therms			5.0000			
Smart Meter						
	CHARGE DESCRIPTION		USAGE UNIT		RATE	CHARGE
Gas Delivery	Customer Charge					\$21.82
Ameren Illinois	Distribution Delivery Charge		5.00 Therms	@	\$0.14807000	\$0.74
GDS-1 Residential Gas	Volume Balancing Adjustment		5.00 Therms	@	\$0.02650000	\$0.13
Delivery Space Heat	Qualifying Infrastructure Plant Surchg	\$22.08		@	4.8400000%	\$1.02
					Gas Delivery	\$23.71
Gas Supply	Purchased Gas Adjustment Charge		5.00 Therms	@	\$0.41686712	\$2.09
Ameren Illinois					Gas Supply	\$2.09
Taxes and Other Fees	Gas Energy Efficiency Cost Recovery		5.00 Therms	@	\$0.02423000	\$0.12
	Gas Environmental Adjustment		5.00 Therms	@	\$0.04339140	\$0.22
	Illinois State Gas Revenue Tax					\$0.12
	Illinois State Commerce Commission Tax					\$0.03
					Total Tax Related Fees	\$0.49
					Total Gas Charges	\$25.29

2

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

5 **A. No. Ameren Illinois provides a greater level of detail and explanation than Ameren Missouri**
 6 **does for its Missouri customers.**

²Ameren Illinois (2019) Sample Bill: Gas Usage Details <https://www.ameren.com/illinois/account/customer-service/bill/understanding-your-bill/sample-bill>

1 Q. Is this the exact same issue OPC raised in Ameren Missouri's electric rate case: ER-2016-
 2 0179?

3 A. Yes.

4 Q. What was the outcome of that case?

5 A. Ameren Missouri agreed to modify its bill as a result of a unanimous stipulation and agreement.

6 Q. Could you provide a visual of how those modifications were adopted on the electric side
 7 but not the gas side?

8 A. Yes. Figure 6 is a sample bill for both Ameren Missouri electric and gas services. The electric
 9 customer charge (\$9.04) is clearly displayed as an authorized charge but the gas customer
 10 charge (\$15.00) is not.

11 Figure 6: Sample bill of an Ameren Missouri electric and gas bill (electric customer charge is clearly
 12 displayed but the gas customer charge is omitted)



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 ▪ 1.800.552.7583
 ▪ PO Box 88068 Chicago, IL 60680-1068
 Ameren payment processing center

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Current Charge Detail for Statement 12/31/2018	
Electric Energy Charge - Residential	\$41.52
Gas Charge - Residential	\$87.04
Electric Customer Charge - Residential	\$9.04
Fuel Adjustment Charge	\$0.93
Infrastructure Replacement Surcharge	\$0.00
Energy Efficiency Investment Charge	\$1.74
Missouri Local Sales Tax	\$2.08
Wentzville Municipal Charge	\$7.23
Federal Tax Rate Reduction	-\$2.94
Late Pay Charge @ 1.5%	\$2.94
Wentzville Municipal Charge - Non Service	\$0.08
Prior Balance	\$196.37
Amount Due	\$346.01

AMOUNT DUE	\$346.01
Due Date:	01/23/2019
Account Number	
Customer Name	
Service Address	
Previous Statement	
P-PGA \$0.52369565 per CCF	
Your account has a past due amount of \$196.37 and may be subject to disconnection. Please pay the amount required to avoid interruption of service.	
Due date applies to current charges only.	
Your electric rate decreased by approximately 6%. Your savings are noted as the Federal Tax Rate Reduction.	

Electric Service from 11/26/2018 - 12/27/2018 31 Days				
Gas Service from 11/26/2018 - 12/27/2018 31 Days				
Meter Number	Current Reading	Previous Reading	Current Usage	Reading Type
055320	051856	051856	473 kWh	Actual
004291	004199	004199	92 CCF	Actual

- 1 Q. Are nonresidential customer bills a concern as well?
2 A. Yes, but the level of concern varies per customer class as seen in Figures 7, 8, 9 and 10:
3 Figure 7: Billing Details in General Service



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Current Charge Detail for Statement 02/18/2019	
Gas Charge - General Service	\$2,541.60
Infrastructure Replacement Surcharge	\$0.00
Missouri State Sales Tax	\$105.84
Missouri Local Sales Tax	\$37.58
Natural Gas Rate Reduction	-\$36.60
Amount Due	\$2,648.42


Gas Service from 01/13/2019 - 02/11/2019 28 Days				
Meter Number	Current Reading	Previous Reading	Current Usage	Reading Type
035495	032727	3268	CCF	Actual

AMOUNT DUE	\$2,648.42
Due Date:	03/07/2019
Account Number	
Customer Name	
Service Address	
Previous Statement	\$2,485.82
Last Payment - 02/04/2019	\$2,485.82
P-PGA \$0.4600000 per CCF	
Your natural gas interim rate reduction reflects operational efficiencies and the Federal Tax Rate Reduction.	

4

1 Figure 8: Billing Details in Standard School Gas Transportation Service



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<p>Account Number Customer Name Service Address</p> <p>Current Detail for Statement 11/07/2018</p> <p>Total Gas Charges \$693.10</p> <hr/> <p>Total Amount Due \$693.10</p>	<p>AMOUNT DUE \$693.10</p> <p>Due Date 11/30/2018</p> <p>Amount After Due Date \$703.50</p> <p>Previous Statement \$416.08</p> <p>Total Payments \$416.08</p> <p><i>Payment Received. Thank You.</i></p>
--	---

2

Gas Service Details (Continued)

Standard Schools Gas Trans Svc - Pan Eastern

DESCRIPTION	USAGE	UNIT	RATE	CHARGE
Transport Delivery Charge	2,010.00	CCF	@ \$ 0.30890000	\$620.89
Aggregation and Balancing Charge	2,010.00	CCF	@ \$ 0.00440000	\$8.84
Customer Charge				\$28.72
			Total Service Amount	\$658.45
DESCRIPTION	USAGE	UNIT	RATE	CHARGE
Wentzville Municipal Charge	\$658.45		@ \$ 0.05263000	\$34.65
			Total Tax Related Charges	\$34.65
			Total Gas Charges	\$693.10

3

Direct Testimony of
 Geoff Marke
 File No. GR-2019-0077

1 Figure 9: Billing Details in Large Volume Gas Transportation Service Interruptible



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Account Number
 Customer Name

AMOUNT DUE \$22,810.15

Service Address

Due Date 11/27/2018

Current Detail for Statement 11/02/2018

Total Gas Charges \$22,810.15

Amount After Due Date \$23,152.30

Total Amount Due \$22,810.15

Previous Statement \$20,209.99

Total Payments \$20,209.99

Payment Received. Thank You.



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Gas Service Details (Continued)



Large Vol Gas Trans Svc - Panhandle Eastern

DESCRIPTION	USAGE	UNIT	RATE	CHARGE
Transport Delivery Charge	7,000.00	CCF	@ \$ 0.30890000	\$2,162.30
Transport Delivery Charge	119,840.00	CCF	@ \$ 0.14840000	\$17,784.26
Administrative Charge				\$43.45
Customer Charge				\$1,451.53
Total Service Amount				\$21,441.54
DESCRIPTION	USAGE	UNIT	RATE	CHARGE
Jeff City Callaway Co Municipal Charge	\$21,441.54		@ \$ 0.06383000	\$1,368.61
Total Tax Related Charges				\$1,368.61
Total Gas Charges				\$22,810.15

2

1 **Figure 10: Billing Details in Interruptible Gas—No Assurance of Gas Option**



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 ■ 1.877.426.3736
 ■ PO Box 88068 Chicago, IL 60680-1068  
Ameren payment processing center

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Account Number Customer Name Service Address	<table border="0" style="width: 100%;"> <tr> <td style="width: 50%;">AMOUNT DUE</td> <td style="width: 50%;">\$22,169.98</td> </tr> <tr> <td>Due Date</td> <td>12/06/2018</td> </tr> <tr> <td>Amount After Due Date</td> <td>\$22,502.53</td> </tr> <tr> <td>Previous Statement</td> <td>\$35,641.76</td> </tr> <tr> <td>Total Payments</td> <td>\$35,641.76</td> </tr> </table> <p><i>Payment Received. Thank You.</i></p>	AMOUNT DUE	\$22,169.98	Due Date	12/06/2018	Amount After Due Date	\$22,502.53	Previous Statement	\$35,641.76	Total Payments	\$35,641.76
AMOUNT DUE	\$22,169.98										
Due Date	12/06/2018										
Amount After Due Date	\$22,502.53										
Previous Statement	\$35,641.76										
Total Payments	\$35,641.76										

Current Detail for Statement 11/14/2018

Total Gas Charges	\$22,169.98
Total Amount Due	\$22,169.98

Gas Service Details (Continued)

Usage Summary

Total CCF	42720.0000
-----------	------------

Interruptible Gas-No Assurance-Texas Eastern

MO Tax Percentage Exemption Gas

DESCRIPTION	USAGE	UNIT	RATE	CHARGE
Purchased Gas Adjustment	42,720.00	CCF	@ \$ 0.28279254	\$12,080.80
Interruptible Delivery Charge	7,000.00	CCF	@ \$ 0.30890000	\$2,162.30
Interruptible Delivery Charge	35,720.00	CCF	@ \$ 0.16320000	\$5,829.50
Customer Charge				\$264.30
Infrastructure Replacement Surcharge				\$0.00
			Total Service Amount	\$20,337.00
DESCRIPTION	USAGE	UNIT	RATE	CHARGE
Missouri Local Sales Tax	\$20,337.00		@ \$ 0.03750000	\$762.64
Cape Gir-Cape Gir Co Municipal Charge	\$20,337.00		@ \$ 0.05263000	\$1,070.34
			Total Tax Related Charges	\$1,832.98
			Total Gas Charges	\$22,169.98

2

3 **Q. What should the Commission note from Figures 7 through 10?**

4 **A.** That the level of billing detail varies considerably per customer class. Additionally, OPC did
 5 not receive sample bill copies of Alternative Fuels or Special Contracts. Presently, we are
 6 unable to opine on the level of bill transparency for those customers.

1 **Q. What are your recommendations?**

2 A. I recommend that the Commission order the Company to clearly display all authorized charges
3 on all customer bills. Additionally, I strongly recommend that Ameren Missouri adopt the
4 equal level of customer bill education it provides for Ameren Illinois ratepayers including
5 updating its website accordingly.

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

7 A. Yes.

CASE PARTICPATION 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)	GR-2019-0077	Direct: Billing Practices
Empire District Electric Company	OPC	EA-2019-0010	Rebuttal: Levelized Cost of Energy, Wind in the Southwest Power Pool Surrebuttal: SPP Market Conditions, Property Taxes, Customer Protections
Empire District Electric Company /Kansas City Power & Light & KCP&L Greater Missouri Operations Company/Union Electric Company d/b/a Ameren Missouri	OPC	EO-2019-0066 EO-2019-0065 EO-2019-0064 EO-2019-0063	Memorandum: Additive Manufacturing and Cement Block Battery Storage (IRP: Special Contemporary Topics)
Rule Making Workshop	OPC	AW-2018-0393	Memorandum: Supplemental Response to Staff Questions pertaining to Rules Governing the Use of Customer Information
Union Electric Company d/b/a Ameren Missouri	OPC	ET-2018-0132	Rebuttal: Line Extension / Charge Ahead – Business Solutions / Charge Ahead – Electric Vehicle Infrastructure Supplemental Rebuttal: EV Adoption Performance Base Metric
Union Electric Company d/b/a Ameren Missouri	OPC	EO-2018-0211	Rebuttal: MEEIA Cycle III Application Surrebuttal: Cost Effectiveness Tests / Equitable Energy Efficiency Baseline
Union Electric Company d/b/a Ameren Missouri	OPC	EA-2018-0202	Rebuttal: Renewable Energy Standard Rate Adjustment Mechanism/Conservation Surrebuttal: Endangered and Protected Species
Kansas City Power & Light & KCP&L Greater Missouri Operations Company	OPC	ER-2018-0145 ER-2018-0146	Direct: Smart Grid Data Privacy Protections Rebuttal: Clean Charge Network / Community Solar / Low Income Community Solar / PAYS/ Weatherization/Economic Relief Pilot Program/Economic Development Rider/Customer Information System and Billing

			Rebuttal: TOU Rates / IBR Rates / Customer Charge / Restoration Charge Surrebuttal: KCPL-GMO Consolidation / Demand Response / Clean Charge Network / One CIS: Privacy, TOU Rates, Billing & Customer Experience
Union Electric Company d/b/a Ameren Missouri	OPC	ET-2018-0063	Rebuttal: Green Tariff
Liberty Utilities	OPC	GR-2018-0013	Surrebuttal: Decoupling
Empire District Electric Company	OPC	EO-2018-0092	Rebuttal: Overview of proposal/ MO PSC regulatory activity / Federal Regulatory Activity / SPP Activity and Modeling / Ancillary Considerations Surrebuttal Response to parties Affidavit in opposition to the non-unanimous stipulation and agreement
Great Plains Energy Incorporated, Kansas City Power & Light Company, KCP&L Greater Missouri Operations Company, and Westar Energy, Inc.	OPC	EM-2018-0012	Rebuttal: Merger Commitments and Conditions / Outstanding Concerns
Missouri American Water	OPC	WR-2017-0285	Direct: Future Test Year/ Cost Allocation Manual and Affiliate Transaction Rules for Large Water Utilities / Lead Line Replacement Direct: Rate Design / Cost Allocation of Lead Line Replacement Rebuttal: Lead Line Replacement / Future Test Year/ Decoupling / Residential Usage / Public-Private Coordination Rebuttal: Rate Design Surrebuttal: affiliate Transaction Rules / Decoupling / Inclining Block Rates / Future Test Year / Single Tariff Pricing / Lead Line Replacement
Missouri Gas Energy / Laclede Gas Company	OPC	GR-2017-0216 GR-2017-0215	Rebuttal: Decoupling / Rate Design / Customer Confidentiality / Line Extension in Unserved and Underserved Areas / Economic Development Rider & Special Contracts Surrebuttal: Pay for Performance / Alagasco & EnergySouth Savings /

			Decoupling / Rate Design / Energy Efficiency / Economic Development Rider: Combined Heat & Power
Indian Hills Utility	OPC	WR-2017-0259	Direct: Rate Design
Rule Making	OPC	EW-2018-0078	Memorandum: Cogeneration and net metering - Disclaimer Language regarding rooftop solar
Empire District Electric Company	OPC	EO-2018-0048	Memorandum: Integrated Resource Planning: Special Contemporary Topics Comments
Kansas City Power & Light	OPC	EO-2018-0046	Memorandum: Integrated Resource Planning: Special Contemporary Topics Comments
KCP&L Greater Missouri Operations Company	OPC	EO-2018-0045	Memorandum: Integrated Resource Planning: Special Contemporary Topics Comments
Missouri American Water	OPC	WU-2017-0296	Direct: Lead line replacement pilot program Rebuttal: Lead line replacement pilot program Surrebuttal: Lead line replacement pilot program
KCP&L Greater Missouri Operations Company	OPC	EO-2017-0230	Memorandum on Integrated Resource Plan, preferred plan update
Working Case: Emerging Issues in Utility Regulation	OPC	EW-2017-0245	Memorandum on Emerging Issues in Utility Regulation / Presentation: Inclining Block Rate Design Considerations Presentation: Missouri Integrated Resource Planning: And the search for the "preferred plan." Memorandum: Draft Rule 4 CSR 240-22.055 DER Resource Planning
Rule Making	OPC	EX-2016-0334	Memorandum on Missouri Energy Efficiency Investment Act Rule Revisions
Great Plains Energy Incorporated, Kansas City Power & Light Company, KCP&L Greater Missouri Operations Company, and Westar Energy, Inc.	OPC	EE-2017-0113 / EM-2017-0226	Direct: Employment within Missouri / Independent Third Party Management Audits / Corporate Social Responsibility

Union Electric Company d/b/a Ameren Missouri	OPC	ET-2016-0246	Rebuttal: EV Charging Station Policy Surrebuttal: EV Charging Station Policy
Kansas City Power & Light		ER-2016-0156	Direct: Consumer Disclaimer Direct: Response to Commission Directed Questions Rebuttal: Customer Experience / Greenwood Solar Facility / Dues and Donations / Electric Vehicle Charging Stations Rebuttal: Class Cost of Service / Rate Design Surrebuttal: Clean Charge Network / Economic Relief Pilot Program / EEI Dues / EPRI Dues
Union Electric Company d/b/a Ameren Missouri	OPC	ER-2016-0179	Direct: Consumer Disclaimer / Transparent Billing Practices / MEEIA Low-Income Exemption Direct: Rate Design Rebuttal: Low-Income Programs / Advertising / EEI Dues Rebuttal: Grid-Access Charge / Inclining Block Rates / Economic Development Riders
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	Memorandum on Performance-Based and Formula Rate Design
Working Case: Electric Vehicle Charging Facilities	OPC	EW-2016-0123	Memorandum 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 Surrebuttal: Potential Study / Overearnings / Program Design Supplemental Direct: Third-party mediator (Delphi Panel) / Performance Incentive Supplemental Rebuttal: Select Differences between Stipulations Rebuttal: Pre-Pay Billing
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

			Rebuttal: Rate Design / Low-Income Weatherization / Solar Rebates Surrebuttal: Economic Considerations / Rate Design / Cyber Security Tracker
Rule Making	OPC	EX-2014-0352	Memorandum Net Metering and Renewable Energy Standard Rule Revisions,
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 Rebuttal: Cycle I Performance Incentive
Kansas City Power & Light	Missouri Public Service Commission Staff	EO-2014-0095	Rebuttal: MEEIA Cycle I Application testimony adopted
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
Working Case: State-Wide Advisory Collaborative	OPC	EW-2013-0519	Presentation: Does Better Information Lead to Better Choices? Evidence from Energy-Efficiency Labels Presentation: Customer Education & Demand-Side Management Presentation: MEEIA: Strengths, Weaknesses, Opportunities and Threats (SWOT) Analysis
Independence-Missouri	OPC	Indy Energy Forum 2014	Presentation: Energy Efficiency
Independence-Missouri	OPC	Indy Energy Forum 2015	Presentation: Rate Design
NARUC – 2017 Winter, Washington D.C.	OPC	Committee on Consumer Affairs	Presentation: PAYS Tariff On-Bill Financing
NASUCA – 2017 Mid-Year, Denver	OPC	Committee on Water Regulation	Presentation: Regulatory Issues Related to Lead-Line Replacement of Water Systems
NASUCA – 2017 Annual Baltimore,	OPC	Committee on Utility Accounting	Presentation: Lead Line Replacement Accounting and Cost Allocation
NARUC – 2018 Annual, Orlando	OPC	Committee on Consumer Affairs	Presentation: PAYS Tariff On-Bill Financing Opportunities & Challenges
Critical Consumer Issues Forum (CCIF)— New Orleans	OPC	Examining Policies for Delivering Smart Mobility	Presentation: Missouri EV Charging Station Policy in 4 Acts: Missouri Office of the Public Counsel Perspective