

Exhibit No. 135

Exhibit No.:
Issue(s): Paperless Billing Program
Witness: Contessa King
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

CONTESSA KING

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

CASE NO. ER-2022-0337

Jefferson City, Missouri
March 2023

Surrebuttal Testimony of
Contessa King

1 A. Ameren Missouri has and continues to use various strategies to encourage its
2 customers to participate in paperless billing. One tactic of interest is the implementation¹ of
3 a pre-checked paperless billing enrollment box which customers must un-check if they
4 DO NOT want to participate in paperless billing. The pre-checked enrollment box is
5 presented to customers that choose to interact with Ameren Missouri via a digital channel
6 (i.e. website, mobile transactions).

7 Q. In your direct testimony you mention that Ameren Missouri responded to
8 customer concerns regarding the pre-checked paperless enrollment box by improving its
9 website to make the pre-checked enrollment box more apparent to customers. Additionally,
10 in his rebuttal testimony, Mr. Harding references proposed enhancements to the Mobile App
11 by end of Q1 2023². Are previous and proposed enhancements sufficient to prevent
12 customers from unintentionally enrolling in paperless billing?

13 A. No. To date, attempts to make the enrollment box more visible has not
14 prevented customers from unintended enrollment. According to Ameren Missouri's
15 response to Staff Data Request (DR) No. 0298.2, dated March 7, 2023, because of the
16 pre-checked enrollment box customers continue to inadvertently enroll in paperless billing.
17 Since the filing of my direct testimony, 48 additional customers contacted Ameren Missouri
18 to express frustration with the pre-checked enrollment box. None of the 48 customers

¹ Ameren Missouri added the pre-checked paperless billing enrollment box to online and mobile transactions in April 2022, Staff DR No. 0298.

² ER-2022-0337, Rebuttal Testimony of Michael W. Harding, pages 10-11.

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1 wanted to be enrolled in paperless billing³, which brings a total of 191⁴ customers that have
2 expressed displeasure with Ameren Missouri’s enrollment tactic.

3 Q. Mr. Harding makes a business case for increasing Ameren Missouri’s
4 paperless billing adoption rates.⁵ Do you agree that there is a financial benefit to customers
5 if Ameren Missouri renders⁶ fewer paper bills and more electronic bills?

6 A. I am not a trained accountant or economist; however, I have 21 years of
7 experience in utility regulation. Based on my years of experience and my understanding of
8 how reductions in O&M costs can potentially benefit a utility and its customers, I agree that
9 there are savings opportunities associated with improving paperless billing adoption rates
10 given the potential decrease in printing and mailing expenses. However, billing option
11 programs designed with costs savings in mind should include transparent enrollment
12 strategies for customers. Presently, customers that interface with Ameren Missouri’s digital
13 channels for transactions not associated with paperless billing enrollment, are later finding
14 themselves enrolled in paperless billing simply because the customer did not “opt-out” by
15 un-checking the pre-selected enrollment box. To mitigate customer confusion, Staff
16 maintains its recommendation that Ameren Missouri un-check the enrollment box and allow

³ 20 CSR 4240-13.015 (1)(B) Bill means a written demand, including, if agreed to by the customer and the utility, an electronic demand, for payment for service or equipment and the taxes, surcharges, and franchise fees.

⁴ Ameren Missouri’s response to Staff DR. No. 0298.1 and Staff DR. No. 0298.2 states that from April 2022 to December 2022, 143 customers expressed frustration with the pre-checked enrollment box and from December 2022 to February 23, 2023, 48 customers expressed frustration.

⁵ ER-2022-0337, Rebuttal Testimony of Michael W. Harding, page 8, lines 4-11.

⁶ 20 CSR 4240-13.020 (1) A utility shall render a bill for each billing period to every residential customer according with commission rules and its approved tariff.

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1 customers to check the box for enrollment themselves, should they choose to do paperless
2 billing. Paperless billing should be an “opt-in” decision for customers rather than “opt-out”.

3 Q. Does this conclude your surrebuttal testimony?

4 A. Yes it does.

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 CONTESSA KING

STATE OF MISSOURI)
)
COUNTY OF COLE) ss.

COMES NOW CONTESSA KING and on her oath declares that she is of sound mind and lawful age; that she contributed to the foregoing *Surrebuttal Testimony of Contessa King*; and that the same is true and correct according to her best knowledge and belief.

Further the Affiant sayeth not.



CONTESSA KING

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 8th day of March 2023.

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



Notary Public