

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

In the Matter of the Consideration of Adoption of the     )  
PURPA Section 111(d)(14) Time-Based Metering and     )  
Communications Standard as Required by Section     )  
1251 of the Energy Policy Act of 2005.     )

**Case No. EO-2006-0496**

**APPLICATION TO INTERVENE BY AARP**

COMES NOW the AARP, by and through counsel, pursuant to Commission Rule 4 CSR 240-2.075, and respectfully applies for intervention as a party in this case established by the Commission in its June 23, 2006 Order

In support of this application, AARP states as follows:

1. AARP is a nonprofit, nonpartisan membership organization that advocates for people who are 50 years of age and older, seeking to promote their independence, choice and control in ways that are beneficial and affordable to them and to society as a whole.<sup>1</sup> AARP operates staffed offices in all 50 states, the District of Columbia, Puerto Rico, and the U.S. Virgin Islands. There are approximately 755,000 AARP members currently residing in the state of Missouri.

---

<sup>1</sup> In 1999, the "American Association of Retired Persons" changed its name to simply "AARP", in recognition of the fact that people do not have to be retired to be members. AARP is incorporated as a 501(c)(4) organization. Its affiliated AARP Foundation is incorporated as a 501(c)(3) organization.

AARP promotes the well-being of older persons through advocacy, education, and service on a number of priority issues. AARP has determined that advocacy for reasonable utility rates and service for seniors is one of these priority issues.

Correspondence, communications, orders and the decision in this matter should be addressed to:

John B. Coffman  
Attorney at Law  
871 Tuxedo Blvd.  
St. Louis, MO 63119-2044  
Ph: (573) 424-6779  
E-mail: [john@johncoffman.net](mailto:john@johncoffman.net)

Janee Briesemeister  
AARP  
98 San Jacinto Blvd. Ste. 750  
Austin, TX 78701  
Ph: (512) 480-2426  
E-mail: [jbriesemeister@aarp.org](mailto:jbriesemeister@aarp.org)

2. AARP has a long track record of professional participation before public utility commissions throughout the country, helping to provide a competent and substantial factual record in numerous cases. AARP has provided credible and persuasive testimony, assisting commissioners in crafting just and reasonable decisions on issues regarding rates and services for older utility consumers.

3. In its July 11, 2006 Order, the Commission directed interested parties wishing to intervene to do so by July 24, 2006, and thus, this application is timely.

4. AARP's interest in this matter relates to the impact of state and federal policies regarding time-based metering and time-of-use rates on older ratepayers. As such, AARP's interest in this case differs from the interest of the general public. Seniors are particularly vulnerable to increases in energy prices as well as volatile changes in rates. Time-Based metering generally permits rates to change during different times of the day. The daily energy use of senior residential customers may differ significantly from the average residential customer. While some seniors may be interested in such non-traditional metering, many seniors would not prefer such a rate scheme.

Generally, AARP believes that regulators should not allow any time-of-use metering that requires mandatory participation. All time-of-use metering and billing programs should utilize an opt-in approach (in which customers must indicate that they want to participate), as opposed to an opt-out approach (which automatically includes customers in a program unless they specifically indicate that they do not want to participate).

6. AARP is opposed to any unjust and unreasonable billing practices or discriminatory terms of service for older residential electric customers, and after further research and investigation into Section 1251 of the Energy Policy Act of 2005, plans to provide the Commission with a more detailed position on any proposals or testimony that is submitted in this case. Accordingly, AARP believes that its intervention and participation in this proceeding would serve the public interest, and wishes to become a party to this case for all purposes.

WHEREFORE, the AARP respectfully requests that the Commission grant its Application to Intervene, entitling it to fully participate in this proceeding.

Respectfully submitted,

/s/ John B. Coffman

---

John B. Coffman MBE #36591  
Attorney at Law  
871 Tuxedo Blvd.  
St. Louis, MO 63119-2044  
Ph: (573) 424-6779  
E-mail: [john@johncoffman.net](mailto:john@johncoffman.net)

Attorney for AARP

## **CERTIFICATE OF SERVICE**

I hereby certify that copies of the foregoing have been mailed, emailed or hand-delivered to the following this 24<sup>th</sup> day of July 2006:

General Counsel's Office  
Missouri Public Service Commission  
P O Box 360  
Jefferson City MO 65102

Office of the Public Counsel  
P.O. Box 2230  
Jefferson City, MO 65102

---