

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

In the Matter of Union Electric)	
Company d/b/a Ameren Missouri's)	
Request for a Waiver of Various)	Case No. EE-2019-0382
Tariffs and Regulations to Enable the)	
Deployment of Automated Metering)	
Infrastructure Beginning in 2020.)	

**CONSUMERS COUNCIL OF MISSOURI'S APPLICATION TO INTERVENE
AND REQUEST FOR HEARING**

COMES NOW the Consumers Council of Missouri ("Consumers Council" or "CCM"), by and through counsel, pursuant to Commission Rule 4 CSR 240-2.075, and respectfully applies for intervention as a party to the in the above-captioned matter. Consumers Council further requests that a procedural schedule be set in this matter, including the opportunity to present evidence at a formal hearing.

In support of this petition, Consumers Council states as follows:

1. Consumers Council is a non-governmental, nonpartisan, nonprofit corporation that is dedicated to educating and empowering consumers statewide and to advocating for their interests. Consumers Council of Missouri was originally founded in 1971 as Utility Consumers Council of Missouri and has participated in numerous cases at the Missouri Public Service Commission

(“Commission”), including several previous and current Ameren Missouri rate cases.

2. On October 8, 2019, Union Electric Company d/b/a Ameren Missouri (“Ameren Missouri” or “Company”) filed a request for waivers from various tariffs and regulations related to Ameren’s deployment of automated metering infrastructure (AMI), including a request to ignore the in-person “door knock” safety check that has been the subject of much debate over many previous years at the Commission.

3. Ameren Missouri states that as it develops out its AMI network, it would like to have certain variances from consumer protection rules related to Ameren Missouri’s desire to include automatic meter shut-off capabilities remotely, rather than using live technicians at the customer premises, as is required by Commission rule, 20 CSR 4240-13.050(9), requiring the company in certain situations to make an attempt to contact the customer in person at the premise before disconnection. For that reason, Ameren Missouri seeks to have a waiver of this “door knock” requirement for all customers with AMI.

4. These arguments were made repeatedly during a *seven-year* period of Commission workshops and informal collaborations and negotiations that occurred as part of a major revision of Chapter 13 (Residential Billing Rules) that started from at least as early as 2007. Consumers Council was an active

participant in those rulemaking discussions. This extended process ultimately resulted in a formal rulemaking (AX-2013-0091), which included public comment from regulated utilities as well as from many public interest groups.

5. In the 2014 *Order of Rulemaking* of this revision of Chapter 13, the Commission decisively resolved the door knock requirement of and a proposal to eliminate this requirement. The Commission found:

The AARP group, Public Counsel, and Jacqueline Hutchinson strongly urge the commission to keep the door knock requirement in place. They believe a knock on the door will often reveal the presence of some person or circumstance that would make a disconnection of utility service a threat to the health or wellbeing of the resident. For example, the door knock might reveal that a resident has electronic medical equipment in use and would be harmed if service is disconnected.

...

RESPONSE: The commission continues to agree with the consumer groups. The door knock requirement as it currently exists in the rule is a proper balancing of the interest of the safety of utility employees against the need to protect the health and welfare of vulnerable customers. The commission will not change the door knock rule.¹

6. Since this matter is of extreme importance to public health and safety, Consumers Council requests an opportunity to learn more about the request and the opportunity to file expert testimony and to make its concerns known about the importance of the door knock rule to vulnerable consumers.

WHEREFORE, Consumers Council respectfully requests formal intervention in this matter for all purposes, and that the Commission order the parties to develop a proposed procedural schedule that includes an evidentiary hearing allowing an opportunity to fully explore the issues presented by the Company's Application.

Respectfully submitted,

Dated: October 23, 2019

/s/ John B. Coffman

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¹ Case No. AX-2013-0091, Order of Rulemaking, p. 17.

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 23rd day of October, 2019.

/s/ John B. Coffman
