

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

In the Matter of Union Electric Company d/b/a)
Ameren Missouri's Application for Approval of)
Revised Tariff Sheet Nos. 54, 54.4, & 54.7 to)
Continue to Default Certain Residential)
Customers to the Evening/Morning Savers Rate)
Plan, Motion for Waiver of 60-Day Notice)
Requirement, Motion for Expedited Treatment,) File No. ET-2024-0156
and if Expedited Treatment Not Granted,)
Alternative Motion for Approval of Substitute)
Revised Tariff Sheets to Delay Defaulting Certain)
Residential Customers to Smart Savers Rate Plan)
Beyond March 31, 2024.)

**RESPONSE TO CCM'S PETITION TO
INTERVENE**

Pursuant to the *Notice and Order Directing Filing* issued by the Missouri Public Service Commission (“Commission”) on November 6, 2023, Union Electric Company d/b/a Ameren Missouri (“Ameren Missouri” or “Company”) responds to the Petition to Intervene (“PTI”) filed by the Consumers Council of Missouri (“CCM”) on November 10, 2023 as follows:

I. Introduction

1. On November 3, 2023, Ameren Missouri filed its *Application* to revise three electric tariff sheets attached thereto as Schedule 1 to allow Ameren Missouri to continue to default residential customers to the low-differential Evening/Morning Savers rate plan instead of the high-differential Smart Savers rate plan, waive the 60-day notice requirement, expedite decision, and alternatively, approve interim substitute electric tariff sheets.

2. On November 9, 2023, Staff filed its recommendation in response to the Company's *Application*. Staff recommends the Commission suspend the three revised tariff sheets proposed by Ameren Missouri's Application to undertake general rate case proceedings, or in the alternative, the Commission reject the proposed three revised tariff sheets.

3. On November 10, 2023, CCM filed its PTI seeking to intervene in the above-captioned case.

4. CCM's PTI voices general support for the Company's first request under its *Application* to modify the default rate plan.¹

5. However, CCM further supports Staff's November 9, 2023 procedural recommendation for the Company's proposed tariffs to be suspended to allow for consideration of all relevant factors as articulated in the UCCM case.²

6. Ameren Missouri does not oppose CCM's intervention into this matter, but opposes CCM's suggestion for the Company's proposed tariffs to be suspended.

II. Argument

7. As explained in Ameren Missouri's *Response to Staff's Recommendation*, Staff's reference to the UCCM case as particularly relevant is perplexing.³ CCM's reference to that case is also perplexing.

8. Since CCM incorporates by reference *Staff's Recommendation* to suspend, and to avoid duplication of arguments and to promote efficiency, Ameren Missouri hereby incorporates its *Response to Staff's Recommendation* herein in opposition to suspension of the proposed tariffs.

WHEREFORE, Ameren Missouri requests that the Commission accept its response to CCM's PTI and give it due consideration in rendering any applicable decision.

¹ CCM's PTI, at p. 3.

² State ex rel. Utility Consumers Council of Missouri, Inc. v. Public Service Commission, 585 S.W.2d 41, 49 (Mo. En Banc 1979).

³ Ameren Missouri's Response to Staff's Recommendation, filed Nov. 15, 2023, at para. 9.

Respectfully submitted,

By: /s/ *Jermaine Grubbs*
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CERTIFICATE OF SERVICE

The undersigned hereby certifies that a true and correct copy of the foregoing document was served on all parties of record via electronic mail (e-mail) on this 15th day of November, 2023.

/s/ Jermaine Grubbs
Jermaine Grubbs