

Exhibit No.:	602
Issues:	Revenue Requirement
Witness:	Annika Brink
Sponsoring Party:	National Housing Trust
Type of Exhibit:	Rebuttal Testimony
Case Nos.:	GR-2017-0215 GR-2017-0216
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MISSOURI PUBLIC SERVICE COMMISSION

FILE NOS. GR-2017-0215 and GR-2017-0216

REBUTTAL TESTIMONY
OF
ANNIKA BRINK
ON
BEHALF OF
NATIONAL HOUSING TRUST

October 17, 2017

DE Exhibit No. 602
Date 12-15-17 Reporter AF
File No. GR-2017-0215
GR-2017-0216

1 **Q. Please state your name and business address.**

2 A. Annika Brink, National Housing Trust, 1101 30th Street NW, Suite 100A, Washington,
3 DC 20007.

4 **Q. On whose behalf are you testifying?**

5 A. I am testifying on behalf of the National Housing Trust (NHT).

6 **Q. By whom are you employed and in what capacity?**

7 A. I am employed by the National Housing Trust (NHT) as their Energy Efficiency Advisor.
8 In this capacity I work with state and local partners across the country to make multifamily
9 housing healthy and affordable through energy efficiency. I have primary responsibility for
10 NHT's energy efficiency policy work in the Midwest, including Missouri.

11 **Q. Are you the same Annika Brink that filed Direct Testimony on Revenue
12 Requirement on September 7 and Direct Testimony on Rate Design on September 22 in
13 this case?**

14 A. Yes I am.

15 **Q. Please summarize your testimony.**

16 A. In my Rebuttal Testimony I counter Office of Public Counsel witness Lena Mantle's
17 recommendation that Laclede and Missouri Gas Energy suspend funding for all energy
18 efficiency programs outside Low Income Weatherization Assistance. First, I point out how Ms.
19 Mantle has applied this recommendation too broadly, on cost-effectiveness grounds, even to low-
20 income energy efficiency programs that traditionally need not be cost-effective. Second, I
21 present evidence that this recommendation, if carried out, would disproportionately harm low-
22 income multifamily households in favor of low-income single-family households. Third, I rebut

1 Ms. Mantle’s assertion that the Ratepayer Impact Measure test should be applied to determine
2 the cost-effectiveness of the Companies’ energy efficiency programs.

3 **Q. Please explain your assertion that Ms. Mantle applied cost-effectiveness arguments**
4 **too broadly.**

5 A. In her direct testimony, Ms. Mantle states that: “an energy efficiency program should
6 only be funded by ratepayers if the program is cost-effective for both participating customers and
7 non-participating customers.”¹ Setting aside for a moment that this is the incorrect standard for
8 whether an energy efficiency program should be funded by ratepayers, I would like to point out
9 that Ms. Mantle’s recommendation would discontinue the Companies’ low-income multifamily
10 programs. These programs are described in tariff sheets 48-c and 48-d for MGE (Income Eligible
11 Multi-Family Direct Install Program) and in tariff sheets 48-g and 48-h for Laclede (Residential
12 Direct-Install Low Income Program). Traditionally, low-income programs need not meet cost-
13 effectiveness tests. Therefore, regardless of the appropriate cost-effectiveness standard applied to
14 *non-low-income* programs, any blanket suspension of energy efficiency programs on cost-
15 effectiveness grounds should not include low-income programs.

16 Missouri already has a practice of not requiring low-income energy efficiency programs
17 to meet cost-effectiveness tests. While I am not an attorney, I have read the plain language of the
18 Missouri Energy Efficiency Investment Act (MEEIA) statute for electric utilities, which states:
19 “[p]rograms targeted to low-income customers... do not need to meet a cost-effectiveness test, so
20 long as the commission determines that the program or campaign is in the public interest.” I
21 believe the MEEIA example should be followed in the case of natural gas utility efficiency
22 programs, as it serves a clear public interest and maintains a consistent approach across utility
23 sectors.

¹ *Direct Testimony of Lena M. Mantle (Revenue Requirement)*, File Nos. GR-2017-0215, GR-2017-0216, September 8, 2017, pg. 3, lines 3-4.

² *Guidelines for Low-Income Energy Efficiency Programs*, ACEEE State and Local Policy Database,

1 Furthermore, reducing or eliminating cost-effectiveness testing for low-income energy
2 efficiency programs is the national trend: 33 states have eased cost-effectiveness testing for low-
3 income programs.² Of these, 29 states have made official accommodations, such as exempting
4 low-income programs from cost-effectiveness testing, requiring the inclusion of low-income
5 non-energy benefits, or providing some other type of flexibility. In the remaining four states
6 regulators have, in practice, approved low-income programs that do not meet cost-effectiveness
7 testing.

8 **Q. How would the suspension of funding for the Companies' energy efficiency**
9 **programs except for Low Income Weatherization Assistance affect low-income multifamily**
10 **households?**

11 A. If, as Ms. Mantle recommends, the Companies were to maintain their funding for Low
12 Income Weatherization Assistance while suspending funding for all other energy efficiency
13 programs, the result would be disproportionate harm to low-income multifamily households,
14 which would likely see a drastic reduction in their access to energy efficiency services.

15 Laclede and Missouri Gas Energy fund two types of low-income energy efficiency
16 programs. First, they fund weatherization, which is delivered by local weatherization providers.
17 Second, they run energy efficiency programs for their low-income customers. Local
18 weatherization providers typically do very well at serving single-family homes and mobile
19 homes. However, for various reasons, they do *not* typically serve many multifamily homes.
20 According to Missouri State Division of Energy (DE) data, multifamily homes comprised only
21 3.4% of units weatherized by local weatherization providers in Missouri in Grant Year 2016.³ —

² *Guidelines for Low-Income Energy Efficiency Programs*, ACEEE State and Local Policy Database, Accessed October 10, 2017. <http://database.aceee.org/state/guidelines-low-income-programs>.

³ *Weatherization Assistance Monthly Report, Grant Year 2016, Grant EE0006164-4, Report Month: June 2017*, Missouri Department of Economic Development: Division of Energy.

1 despite comprising 19.9% of housing units statewide.⁴ These data are for units funded, at least
 2 partially, by U.S. Department of Energy Weatherization Assistance Program funds. This
 3 percentage is not expected to vary significantly for units funded/partially funded via other
 4 sources. To give a sense of scale, in Grant Year 2016, only 55 out of 1,596 units weatherized in
 5 Missouri using DOE funds were in multifamily buildings.⁵ And, *all* of these were in buildings of
 6 2-4 units, leaving buildings of 5+ units completely unserved. The Division of Energy
 7 Weatherization Assistance Monthly Report cited above is included as Appendix 1. Highlights
 8 and comparison with statewide housing stock are shown in Table 1 below.

9 *Table 1: Use of Federal WAP Funds in Grant Year 2016 by Missouri's Local Weatherization*
 10 *Providers Versus Percentage Share of Different Housing Types*

Type of Housing Unit	Number of Each Type of Housing Unit Weatherized (DE data)	Percent of Each Type of Housing Unit Weatherized (DE data)	Share of Housing Unit Type Among All Housing Units (2015 Census data)
Single Family	1239	77.6%	73.7%
Multifamily (2+ units)	55	3.4%	19.9%
Mobile Home	296	18.5%	6.3%%
Shelters	0	0.0%	N/A
Previously Weatherized Units	6	0.4%	N/A
Boat, RV, Van, Etc.	N/A	N/A	0.1%

11

12 As shown here, low-income multifamily households are not typically served by Low
 13 Income Weatherization Assistance and would be disproportionately harmed vs. low-income
 14 single-family households by the elimination of the Companies' energy efficiency programs.

15 **Q. Why do you assert that the Ratepayer Impact Measure test should not be applied to**
 16 **determine the cost-effectiveness of the Companies' energy efficiency programs?**

⁴ U.S. Census American Community Survey data, 2015 5-Year Estimates, Table B25024. In Missouri, the weatherization programs define multifamily as buildings of two or more units.

⁵ *Weatherization Assistance Monthly Report, Grant Year 2016*, Grant EE0006164-4, Report Month: June 2017.

1 A. First, no specific cost-effectiveness test is prescribed for gas utilities in Missouri, so to
2 present the Ratepayer Impact Measure (RIM), as Ms. Mantle has done, as the preferred test is not
3 grounded in precedent. Ms. Mantle recommends the commission demonstrate that an energy
4 efficiency program be cost effective to non-participating customers, in addition to participating
5 customers. This is essentially the RIM test, which aims to indicate whether energy efficiency
6 programs/resources will increase or decrease electricity or gas rates for all customers. The RIM
7 test was previously referred to as the “Non-Participant Test”, and is intended to show “the
8 distributional impacts of efficiency programs on nonparticipants”.⁶ The RIM test *excludes* a host
9 of benefits that are included in various other cost-effectiveness tests. The Commission has not
10 given guidance on which test should be used for gas programs.

11 Second, precedent *has* been set for a preferred cost-effectiveness test in the state of
12 Missouri, which is the Total Resource Cost (TRC) test, the preferred test for the state’s electric
13 utility energy efficiency programs under MEEIA. Use of the TRC for gas programs would
14 maintain a consistent approach across utility sectors.

15 Third, the RIM test has been discredited, is not in wide use, and is, for a variety of other
16 reasons, not appropriate as a cost-effectiveness test for the Companies’ programs. The American
17 Council for Energy Efficiency (ACEEE) found that the RIM test has been largely abandoned by
18 leading energy efficiency states in their 2012 study of forty-four states and their cost-
19 effectiveness practices.⁷ Only one of the states surveyed indicated they used the RIM test as their
20 primary test, and that one state no longer continues to do so. Based on those results and previous
21 research on the flaws of the RIM test, ACEEE states that the RIM test should not be used to

⁶ *Understanding Cost-Effectiveness of Energy Efficiency Programs*, National Action Plan for Energy Efficiency, November 2008, p. 6-4. <https://www.epa.gov/sites/production/files/2015-08/documents/cost-effectiveness.pdf>

⁷ Kushler, M., Nowak, S., Witte, P., *A National Survey of State Policies and Practices for the Evaluation of Ratepayer Funded Energy Efficiency Programs*, February 2012.

1 determine whether and/or which energy efficiency measures or programs will be delivered.⁸
2 Another resource that strongly criticizes the RIM test as a primary cost-effectiveness test is the
3 *National Standard Practice Manual for Assessing Cost-Effectiveness of Energy Efficiency*
4 *Resources*.⁹ The comprehensive manual, which received input and review from utilities and
5 energy efficiency experts across the country, provides a framework for cost-effectiveness
6 assessments of energy resources. It clearly states that the RIM test is insufficient and extremely
7 limited as a primary cost-effectiveness test for the following reasons:¹⁰

- 8 • It does not provide accurate information of what happens to rates from energy efficiency
9 investments. It only indicates if they go up or down but not the magnitude of that increase
10 or decrease.
- 11 • It does not typically result in the lowest cost to customers.
- 12 • It can lead to unintended outcomes, such as rejections of energy efficiency investments
13 that would have had significant reduction impacts on utility systems costs.
- 14 • It often provides misleading results.
- 15 • It attempts to combine cost-effectiveness and equity issues into one calculation, but
16 conflates the two issues in the process.
- 17 • It is inconsistent with how other gas and electric resources are reviewed for cost-
18 effectiveness.

19 Also noteworthy, all customers (participants and non-participants) receive some of the
20 benefits of energy efficiency resources. Energy efficiency resources can reduce wholesale energy

⁸ Ibid p. 36-37.

⁹ National Efficiency Screening Project, *National Standard Practice Manual for Assessing Cost-Effectiveness of Energy Efficiency Resources*, May 18, 2017.

https://nationalefficiencyscreening.org/wp-content/uploads/2017/05/NSPM_May-2017_final.pdf

¹⁰ Ibid p. 114, 122-124.

1 prices, reduce T&D costs, improve system reliability, reduce risk, and more – for *all*
2 customers.¹¹

3 ACEEE’s 2012 national study of state evaluation practices found that 86% of the 41
4 states with a *primary* cost-effectiveness test used either the TRC or the Societal Cost Test (SCT)
5 as their primary test.¹² The SCT includes all benefits of a Total Resource Cost test (TRC) plus
6 benefits experienced by all of society. These include “low-income community benefits,
7 environmental benefits, economic development benefits, and reduced health care costs”.¹³

8 **Q. Does this conclude your rebuttal testimony?**

9 **A. Yes.**

¹¹ Ibid pg. 123

¹² Kushler, M., Nowak, S., Witte, pg. 2012.

¹³ *National Standard Practice Manual for Assessing Cost-Effectiveness of Energy Efficiency Resources*, pg. 113.

Weatherization Assistance Monthly Report

Statewide

Grant: EE0006164-4
 Grant FY: 2016
 Report Month: June 2017

Client Characteristics

Grant to Date Totals		
	<u>Jun17</u>	<u>GTD</u>
Elderly	63	766
Disabled	73	929
Native American	4	145
Veteran	2	2
19 and Under	88	1,242
Other	58	931
Total People	258	3,499
Total Homes	124	1,590

Cumulative Totals												
	<u>Jan17</u>	<u>Feb17</u>	<u>Mar17</u>	<u>Apr17</u>	<u>May17</u>	<u>Jun17</u>	<u>Jul17</u>	<u>Aug17</u>	<u>Sep17</u>	<u>Oct17</u>	<u>Nov17</u>	<u>Dec17</u>
Elderly	62	57	80	72	78	63	0	0	0	0	0	0
Disabled	94	70	105	74	85	73	0	0	0	0	0	0
Native American	4	16	16	21	18	4	0	0	0	0	0	0
Veteran	0	0	0	0	0	2	0	0	0	0	0	0
19 and Under	128	97	111	118	114	88	0	0	0	0	0	0
Other	96	82	91	90	71	58	0	0	0	0	0	0
Total People	338	285	347	323	313	258	0	0	0	0	0	0
Total Homes	145	138	160	142	139	124	0	0	0	0	0	0
	<u>Jan16</u>	<u>Feb16</u>	<u>Mar16</u>	<u>Apr16</u>	<u>May16</u>	<u>Jun16</u>	<u>Jul16</u>	<u>Aug16</u>	<u>Sep16</u>	<u>Oct16</u>	<u>Nov16</u>	<u>Dec16</u>
Elderly	0	0	0	0	0	0	60	60	73	79	37	45
Disabled	0	0	0	0	0	0	73	59	81	91	59	65
Native American	0	0	0	0	0	0	13	11	11	11	15	5
Veteran	0	0	0	0	0	0	0	0	0	0	0	0
19 and Under	0	0	0	0	0	0	137	85	83	104	100	77
Other	0	0	0	0	0	0	95	73	67	89	55	64
Total People	0	0	0	0	0	0	342	253	264	317	234	225
Total Homes	0	0	0	0	0	0	147	121	129	143	95	107

Weatherization Assistance Monthly Report

Statewide

Grant: EE0006164-4
 Grant FY: 2016
 Report Month: June 2017

Dwelling Unit Characteristics

Grant to Date Totals		
	<u>Jun17</u>	<u>GTD</u>
Elderly	57	658
Disabled	64	789
Native American	4	94
Veteran	2	2
Emergency	0	34
19 and Under	41	581
Other	44	692

Cumulative Totals												
	<u>Jan17</u>	<u>Feb17</u>	<u>Mar17</u>	<u>Apr17</u>	<u>May17</u>	<u>Jun17</u>	<u>Jul17</u>	<u>Aug17</u>	<u>Sep17</u>	<u>Oct17</u>	<u>Nov17</u>	<u>Dec17</u>
Elderly	54	51	67	60	63	57	0	0	0	0	0	0
Disabled	78	64	89	64	71	64	0	0	0	0	0	0
Native American	2	9	11	14	10	4	0	0	0	0	0	0
Veteran	0	0	0	0	0	2	0	0	0	0	0	0
Emergency	4	9	5	10	3	0	0	0	0	0	0	0
19 and Under	51	49	55	61	54	41	0	0	0	0	0	0
Other	68	63	68	67	51	44	0	0	0	0	0	0
	<u>Jan16</u>	<u>Feb16</u>	<u>Mar16</u>	<u>Apr16</u>	<u>May16</u>	<u>Jun16</u>	<u>Jul16</u>	<u>Aug16</u>	<u>Sep16</u>	<u>Oct16</u>	<u>Nov16</u>	<u>Dec16</u>
Elderly	0	0	0	0	0	0	52	52	62	68	33	39
Disabled	0	0	0	0	0	0	60	53	66	75	50	55
Native American	0	0	0	0	0	0	9	9	8	7	7	4
Veteran	0	0	0	0	0	0	0	0	0	0	0	0
Emergency	0	0	0	0	0	0	1	0	1	0	1	0
19 and Under	0	0	0	0	0	0	59	40	38	45	46	42
Other	0	0	0	0	0	0	73	53	52	65	41	47

Weatherization Assistance Monthly Report

Statewide

Grant: EE0006164-4
Grant FY: 2016
Report Month: June 2017

Total Dwelling Units

Grant to Date Totals		
	<u>Jun17</u>	<u>GTD</u>
Owner Occupied Site Built	86	1,079
Renter Single Family Site Built	17	160
Owner Multifamily Site Built	0	18
Renter Multifamily Site Built	3	37
Renter Occupied Mobile Home	1	37
Owner Occupied Mobile Home	17	259
Shelters	0	0
Previously Weatherized Units	1	6

Cumulative Totals												
	<u>Jan17</u>	<u>Feb17</u>	<u>Mar17</u>	<u>Apr17</u>	<u>May17</u>	<u>Jun17</u>	<u>Jul17</u>	<u>Aug17</u>	<u>Sep17</u>	<u>Oct17</u>	<u>Nov17</u>	<u>Dec17</u>
Owner Occupied Site Built	94	84	103	100	90	86	0	0	0	0	0	0
Renter Single Family Site Built	24	17	11	16	14	17	0	0	0	0	0	0
Owner Multifamily Site Built	1	4	2	0	0	0	0	0	0	0	0	0
Renter Multifamily Site Built	5	3	3	8	0	3	0	0	0	0	0	0
Renter Occupied Mobile Home	2	4	5	2	7	1	0	0	0	0	0	0
Owner Occupied Mobile Home	19	26	36	16	28	17	0	0	0	0	0	0
Shelters	0	0	0	0	0	0	0	0	0	0	0	0
Previously Weatherized Units	0	1	1	0	1	1	0	0	0	0	0	0
	<u>Jan16</u>	<u>Feb16</u>	<u>Mar16</u>	<u>Apr16</u>	<u>May16</u>	<u>Jun16</u>	<u>Jul16</u>	<u>Aug16</u>	<u>Sep16</u>	<u>Oct16</u>	<u>Nov16</u>	<u>Dec16</u>
Owner Occupied Site Built	0	0	0	0	0	0	107	94	86	102	60	73
Renter Single Family Site Built	0	0	0	0	0	0	12	9	11	11	12	6
Owner Multifamily Site Built	0	0	0	0	0	0	1	0	4	4	0	2
Renter Multifamily Site Built	0	0	0	0	0	0	2	0	5	2	4	2
Renter Occupied Mobile Home	0	0	0	0	0	0	2	2	3	2	3	4
Owner Occupied Mobile Home	0	0	0	0	0	0	23	16	20	22	16	20
Shelters	0	0	0	0	0	0	0	0	0	0	0	0
Previously Weatherized Units	0	0	0	0	0	0	0	0	1	0	1	0

Weatherization Assistance Monthly Report

Statewide

Grant: EE0006164-4
 Grant FY: 2016
 Report Month: June 2017

County Production Report

COUNTY_NAME	YEAR	JAN	FEB	MAR	APR	MAY	JUN	JUL	AUG	SEP	OCT	NOV	DEC
1 - ADAIR	2016	0	0	0	0	0	0	3	0	2	1	2	0
	2017	1	1	2	2	1	0	0	0	0	0	0	0
GTD Total Units													15
2 - ANDREW	2016	0	0	0	0	0	0	0	0	0	0	1	0
	2017	1	0	0	0	0	1	0	0	0	0	0	0
GTD Total Units													3
3 - ATCHISON	2016	0	0	0	0	0	0	1	1	0	0	0	0
GTD Total Units													2
4 - AUDRAIN	2016	0	0	0	0	0	0	3	1	1	2	0	0
	2017	0	2	0	3	0	0	0	0	0	0	0	0
GTD Total Units													12
5 - BARRY	2016	0	0	0	0	0	0	2	2	2	1	1	1
	2017	0	4	2	2	0	0	0	0	0	0	0	0
GTD Total Units													17
6 - BARTON	2016	0	0	0	0	0	0	0	2	0	0	2	0
	2017	0	1	0	1	1	0	0	0	0	0	0	0
GTD Total Units													7
7 - BATES	2016	0	0	0	0	0	0	0	0	0	2	0	0
	2017	0	0	0	0	1	0	0	0	0	0	0	0
GTD Total Units													3
8 - BENTON	2016	0	0	0	0	0	0	0	0	0	2	0	0
	2017	0	0	2	0	0	1	0	0	0	0	0	0
GTD Total Units													5
9 - BOLLINGER	2016	0	0	0	0	0	0	0	0	1	1	0	0
	2017	1	0	0	1	0	0	0	0	0	0	0	0
GTD Total Units													4
10 - BOONE	2016	0	0	0	0	0	0	3	2	1	1	2	0
	2017	13	5	1	4	1	2	0	0	0	0	0	0
GTD Total Units													35
11 - BUCHANAN	2016	0	0	0	0	0	0	3	2	0	2	0	1
	2017	1	3	2	0	4	4	0	0	0	0	0	0
GTD Total Units													22
12 - BUTLER	2016	0	0	0	0	0	0	0	2	0	2	0	2
	2017	2	0	3	2	1	1	0	0	0	0	0	0
GTD Total Units													15
13 - CALDWELL	2017	0	0	0	0	1	0	0	0	0	0	0	0
GTD Total Units													1
14 - CALLAWAY	2016	0	0	0	0	0	0	7	1	1	3	1	0
	2017	4	0	3	2	0	3	0	0	0	0	0	0
GTD Total Units													25

Weatherization Assistance Monthly Report

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Grant FY: 2016
Report Month: June 2017

15 - CAMDEN	2016	0	0	0	0	0	0	2	1	1	0	2	0
	2017	0	0	0	2	1	1	0	0	0	0	0	0
GTD Total Units													10
16 - CAPE GIRARDEAU	2016	0	0	0	0	0	0	0	0	3	1	0	1
	2017	2	0	0	0	1	1	0	0	0	0	0	0
GTD Total Units													9
17 - CARROLL	2016	0	0	0	0	0	0	0	0	1	0	0	0
	GTD Total Units												
18 - CARTER	2016	0	0	0	0	0	0	0	0	1	0	1	0
	GTD Total Units												
19 - CASS	2016	0	0	0	0	0	0	1	0	1	0	0	1
	2017	0	0	0	2	0	0	0	0	0	0	0	0
GTD Total Units													5
20 - CEDAR	2016	0	0	0	0	0	0	0	3	0	1	0	1
	GTD Total Units												
21 - CHARITON	2016	0	0	0	0	0	0	0	1	0	0	2	0
	2017	0	0	1	0	0	0	0	0	0	0	0	0
GTD Total Units													4
22 - CHRISTIAN	2016	0	0	0	0	0	0	4	0	0	1	1	0
	2017	0	0	5	1	2	2	0	0	0	0	0	0
GTD Total Units													16
23 - CLARK	2016	0	0	0	0	0	0	1	0	0	2	0	2
	2017	0	0	0	0	1	0	0	0	0	0	0	0
GTD Total Units													6
24 - CLAY	2016	0	0	0	0	0	0	3	2	2	4	4	2
	2017	1	7	4	2	4	3	0	0	0	0	0	0
GTD Total Units													38
25 - CLINTON	2016	0	0	0	0	0	0	0	0	0	0	1	0
	2017	0	0	1	0	0	0	0	0	0	0	0	0
GTD Total Units													2
26 - COLE	2016	0	0	0	0	0	0	0	4	1	0	1	0
	2017	7	1	3	0	0	0	0	0	0	0	0	0
GTD Total Units													17
27 - COOPER	2016	0	0	0	0	0	0	1	1	3	0	0	0
	2017	1	0	1	0	0	1	0	0	0	0	0	0
GTD Total Units													8
28 - CRAWFORD	2016	0	0	0	0	0	0	0	1	0	0	0	1
	2017	0	0	1	0	1	0	0	0	0	0	0	0
GTD Total Units													4
29 - DADE	2016	0	0	0	0	0	0	0	0	0	0	2	0
	2017	0	2	0	0	0	0	0	0	0	0	0	0
GTD Total Units													4

Weatherization Assistance Monthly Report

Statewide

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 Grant FY: 2016
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30 - DALLAS	2016	0	0	0	0	0	0	2	2	0	1	0	1
	2017	0	0	0	4	1	0	0	0	0	0	0	0
GTD Total Units													11
31 - DAVIESS	2016	0	0	0	0	0	0	0	0	0	1	0	0
	2017	0	0	0	1	0	0	0	0	0	0	0	0
GTD Total Units													2
32 - DEKALB	2016	0	0	0	0	0	0	0	0	0	0	0	1
	2017	0	0	1	0	0	0	0	0	0	0	0	0
GTD Total Units													2
33 - DENT	2016	0	0	0	0	0	0	0	2	0	1	0	0
	GTD Total Units												
34 - DOUGLAS	2016	0	0	0	0	0	0	0	0	0	0	0	1
	2017	0	1	0	0	0	0	0	0	0	0	0	0
GTD Total Units													2
35 - DUNKLIN	2016	0	0	0	0	0	0	1	1	0	1	0	0
	2017	0	2	1	1	1	0	0	0	0	0	0	0
GTD Total Units													8
36 - FRANKLIN	2016	0	0	0	0	0	0	1	2	0	1	2	2
	2017	1	1	3	1	3	2	0	0	0	0	0	0
GTD Total Units													19
37 - GASCONADE	2016	0	0	0	0	0	0	1	0	0	0	1	0
	2017	1	0	0	0	0	0	0	0	0	0	0	0
GTD Total Units													3
38 - GENTRY	2016	0	0	0	0	0	0	0	0	0	4	0	0
	2017	0	1	0	1	0	0	0	0	0	0	0	0
GTD Total Units													6
39 - GREENE	2016	0	0	0	0	0	0	5	5	5	4	3	7
	2017	7	3	5	3	3	7	0	0	0	0	0	0
GTD Total Units													57
40 - GRUNDY	2016	0	0	0	0	0	0	0	0	0	0	1	0
	2017	0	1	0	0	0	0	0	0	0	0	0	0
GTD Total Units													2
41 - HARRISON	2016	0	0	0	0	0	0	0	1	0	0	1	0
	2017	1	1	0	1	0	0	0	0	0	0	0	0
GTD Total Units													5
42 - HENRY	2016	0	0	0	0	0	0	1	3	4	0	0	0
	2017	0	0	2	0	0	0	0	0	0	0	0	0
GTD Total Units													10
43 - HICKORY	2016	0	0	0	0	0	0	0	1	0	1	0	0
	2017	2	0	0	0	0	0	0	0	0	0	0	0
GTD Total Units													4
44 - HOLT	2016	0	0	0	0	0	0	0	1	0	0	0	0
	GTD Total Units												

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45 - HOWARD	2016	0	0	0	0	0	0	1	1	1	0	1	0
	2017	0	1	0	0	0	0	0	0	0	0	0	0
GTD Total Units													5
46 - HOWELL	2016	0	0	0	0	0	0	1	0	4	1	1	0
	2017	3	1	4	4	7	2	0	0	0	0	0	0
GTD Total Units													28
47 - IRON	2016	0	0	0	0	0	0	1	0	0	0	0	1
	2017	0	0	0	1	0	0	0	0	0	0	0	0
GTD Total Units													3
48 - JACKSON	2016	0	0	0	0	0	0	17	11	18	15	16	13
	2017	19	13	16	18	16	17	0	0	0	0	0	0
GTD Total Units													189
49 - JASPER	2016	0	0	0	0	0	0	8	8	7	5	8	7
	2017	7	5	6	4	5	7	0	0	0	0	0	0
GTD Total Units													77
50 - JEFFERSON	2016	0	0	0	0	0	0	5	1	4	6	2	2
	2017	2	4	14	2	10	4	0	0	0	0	0	0
GTD Total Units													56
51 - JOHNSON	2016	0	0	0	0	0	0	2	1	0	1	0	1
	2017	0	0	1	0	1	1	0	0	0	0	0	0
GTD Total Units													8
52 - KNOX	2016	0	0	0	0	0	0	0	2	0	0	0	0
	2017	1	0	0	0	0	0	0	0	0	0	0	0
GTD Total Units													3
53 - LACLEDE	2016	0	0	0	0	0	0	1	3	1	3	1	3
	2017	5	3	1	2	1	0	0	0	0	0	0	0
GTD Total Units													24
54 - LAFAYETTE	2016	0	0	0	0	0	0	0	0	1	1	0	0
	2017	1	0	0	0	0	0	0	0	0	0	0	0
GTD Total Units													3
55 - LAWRENCE	2016	0	0	0	0	0	0	1	0	1	1	0	1
	2017	1	1	0	1	2	1	0	0	0	0	0	0
GTD Total Units													10
56 - LEWIS	2017	0	0	0	0	0	1	0	0	0	0	0	0
GTD Total Units													1
57 - LINCOLN	2016	0	0	0	0	0	0	3	0	1	3	0	2
	2017	1	0	0	1	3	0	0	0	0	0	0	0
GTD Total Units													14
58 - LINN	2016	0	0	0	0	0	0	0	0	1	0	0	0
	2017	1	1	0	0	0	1	0	0	0	0	0	0
GTD Total Units													4
59 - LIVINGSTON	2016	0	0	0	0	0	0	1	1	0	0	0	0
	2017	0	0	1	2	0	0	0	0	0	0	0	0
GTD Total Units													5

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60 - MCDONALD	2016	0	0	0	0	0	0	0	0	0	4	0	2
	2017	0	0	1	2	0	0	0	0	0	0	0	0
GTD Total Units													9
61 - MACON	2016	0	0	0	0	0	0	1	1	2	0	1	2
	2017	0	2	0	1	2	1	0	0	0	0	0	0
GTD Total Units													13
62 - MADISON	2016	0	0	0	0	0	0	1	0	0	1	0	0
	2017	0	0	0	0	1	0	0	0	0	0	0	0
GTD Total Units													3
63 - MARIES	2017	0	0	3	0	0	0	0	0	0	0	0	0
GTD Total Units													3
64 - MARION	2016	0	0	0	0	0	0	1	0	2	1	2	0
	2017	0	2	0	1	1	3	0	0	0	0	0	0
GTD Total Units													13
65 - MERCER	2016	0	0	0	0	0	0	1	0	1	0	0	1
GTD Total Units													3
66 - MILLER	2016	0	0	0	0	0	0	0	0	1	0	0	1
	2017	0	1	0	2	1	0	0	0	0	0	0	0
GTD Total Units													6
67 - MISSISSIPPI	2016	0	0	0	0	0	0	0	0	0	0	0	2
	2017	0	1	0	0	0	0	0	0	0	0	0	0
GTD Total Units													3
68 - MONITEAU	2017	3	1	2	0	1	0	0	0	0	0	0	0
GTD Total Units													7
69 - MONROE	2016	0	0	0	0	0	0	1	0	0	1	1	0
	2017	0	0	0	1	1	0	0	0	0	0	0	0
GTD Total Units													5
70 - MONTGOMERY	2016	0	0	0	0	0	0	1	0	0	0	0	1
	2017	0	2	0	1	0	0	0	0	0	0	0	0
GTD Total Units													5
71 - MORGAN	2016	0	0	0	0	0	0	0	0	1	1	0	0
	2017	0	0	2	0	0	0	0	0	0	0	0	0
GTD Total Units													4
72 - NEW MADRID	2016	0	0	0	0	0	0	0	0	2	2	0	1
	2017	0	0	2	1	1	1	0	0	0	0	0	0
GTD Total Units													10
73 - NEWTON	2016	0	0	0	0	0	0	1	1	0	0	2	2
	2017	0	4	4	1	2	1	0	0	0	0	0	0
GTD Total Units													18
74 - NODAWAY	2016	0	0	0	0	0	0	1	0	1	0	1	1
	2017	0	0	1	2	0	2	0	0	0	0	0	0
GTD Total Units													9
75 - OREGON	2016	0	0	0	0	0	0	1	0	0	1	0	0
GTD Total Units													2

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76 - OSAGE	2016	0	0	0	0	0	0	0	0	0	1	0	0
	2017	0	0	2	0	0	0	0	0	0	0	0	0
GTD Total Units													3
77 - OZARK	2016	0	0	0	0	0	0	0	0	2	1	0	0
	2017												
GTD Total Units													3
78 - PEMISCOT	2016	0	0	0	0	0	0	1	1	1	1	1	0
	2017	1	0	0	1	0	0	0	0	0	0	0	0
GTD Total Units													7
79 - PERRY	2016	0	0	0	0	0	0	1	0	1	0	0	0
	2017	0	1	0	0	0	2	0	0	0	0	0	0
GTD Total Units													5
80 - PETTIS	2016	0	0	0	0	0	0	0	1	0	1	1	2
	2017	1	0	0	1	1	1	0	0	0	0	0	0
GTD Total Units													9
81 - PHELPS	2016	0	0	0	0	0	0	0	2	3	1	0	1
	2017	1	1	2	0	0	1	0	0	0	0	0	0
GTD Total Units													12
82 - PIKE	2016	0	0	0	0	0	0	2	0	1	1	1	0
	2017	1	2	1	0	2	1	0	0	0	0	0	0
GTD Total Units													12
83 - PLATTE	2016	0	0	0	0	0	0	2	0	2	0	0	0
	2017												
GTD Total Units													4
84 - POLK	2016	0	0	0	0	0	0	0	1	0	1	0	1
	2017	0	0	2	2	0	1	0	0	0	0	0	0
GTD Total Units													8
85 - PULASKI	2016	0	0	0	0	0	0	1	3	2	3	2	2
	2017	1	0	0	1	2	4	0	0	0	0	0	0
GTD Total Units													21
86 - PUTNAM	2016												
	2017	1	0	0	0	0	1	0	0	0	0	0	0
GTD Total Units													2
87 - RALLS	2016	0	0	0	0	0	0	0	1	1	0	0	0
	2017	0	0	1	1	0	1	0	0	0	0	0	0
GTD Total Units													5
88 - RANDOLPH	2016	0	0	0	0	0	0	1	0	1	0	3	1
	2017	1	2	1	0	0	1	0	0	0	0	0	0
GTD Total Units													11
89 - RAY	2016	0	0	0	0	0	0	0	0	1	0	0	0
	2017	0	2	0	0	0	0	0	0	0	0	0	0
GTD Total Units													3
90 - REYNOLDS	2016	0	0	0	0	0	0	1	0	0	0	1	0
	2017												
GTD Total Units													2
91 - RIPLEY	2016	0	0	0	0	0	0	1	0	0	0	0	1
	2017	0	0	0	1	0	1	0	0	0	0	0	0
GTD Total Units													4

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92 - ST. CHARLES	2016	0	0	0	0	0	0	1	0	4	3	1	3
	2017	2	3	2	3	4	2	0	0	0	0	0	0
GTD Total Units													28
93 - ST. CLAIR	2016	0	0	0	0	0	0	1	1	2	1	0	0
	2017	0	0	1	1	0	0	0	0	0	0	0	0
GTD Total Units													7
94 - ST. FRANCOIS	2016	0	0	0	0	0	0	1	1	0	0	1	1
	2017	1	0	2	2	1	0	0	0	0	0	0	0
GTD Total Units													10
95 - STE GENEVIEVE	2016	0	0	0	0	0	0	0	0	0	2	0	1
	2017	1	1	0	0	0	2	0	0	0	0	0	0
GTD Total Units													7
96 - ST. LOUIS	2016	0	0	0	0	0	0	19	23	18	17	5	15
	2017	15	16	24	17	20	8	0	0	0	0	0	0
GTD Total Units													197
97 - SALINE	2016	0	0	0	0	0	0	1	0	0	1	0	0
	2017	1	1	0	1	0	1	0	0	0	0	0	0
GTD Total Units													6
98 - SCHUYLER	2016	0	0	0	0	0	0	0	0	1	0	0	0
	2017	0	0	1	0	1	0	0	0	0	0	0	0
GTD Total Units													3
99 - SCOTLAND	2017	0	0	1	0	0	0	0	0	0	0	0	0
GTD Total Units													1
100 - SCOTT	2016	0	0	0	0	0	0	0	2	0	2	0	1
	2017	2	1	1	1	3	0	0	0	0	0	0	0
GTD Total Units													13
101 - SHANNON	2016	0	0	0	0	0	0	2	0	2	2	1	0
GTD Total Units													7
102 - SHELBY	2016	0	0	0	0	0	0	2	0	1	0	1	1
GTD Total Units													5
103 - STODDARD	2017	1	0	0	0	0	2	0	0	0	0	0	0
	2016	0	0	0	0	0	0	1	0	0	0	0	1
GTD Total Units													5
104 - STONE	2016	0	0	0	0	0	0	0	0	0	1	1	0
	2017	0	0	0	1	1	0	0	0	0	0	0	0
GTD Total Units													4
105 - SULLIVAN	2017	0	0	1	0	0	0	0	0	0	0	0	0
GTD Total Units													1
106 - TANEY	2016	0	0	0	0	0	0	0	1	2	0	2	0
	2017	1	0	1	2	4	2	0	0	0	0	0	0
GTD Total Units													15
107 - TEXAS	2016	0	0	0	0	0	0	1	1	1	0	1	0
	2017	0	1	1	1	0	1	0	0	0	0	0	0
GTD Total Units													8

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108 - VERNON	2016	0	0	0	0	0	0	2	1	0	0	0	0
	2017	0	0	0	1	0	1	0	0	0	0	0	0
GTD Total Units													
5													
109 - WARREN	2016	0	0	0	0	0	0	2	0	2	1	1	1
	2017	0	2	0	1	0	0	0	0	0	0	0	0
GTD Total Units													
10													
110 - WASHINGTON	2016	0	0	0	0	0	0	1	2	0	0	0	0
	2017	2	2	0	0	2	1	0	0	0	0	0	0
GTD Total Units													
10													
111 - WAYNE	2017	0	3	0	0	1	0	0	0	0	0	0	0
GTD Total Units													
4													
112 - WEBSTER	2016	0	0	0	0	0	0	1	1	0	0	1	0
	2017	1	2	0	2	1	2	0	0	0	0	0	0
GTD Total Units													
11													
113 - WORTH	2016	0	0	0	0	0	0	0	1	0	0	0	0
	2017	1	1	0	0	0	0	0	0	0	0	0	0
GTD Total Units													
3													
114 - WRIGHT	2016	0	0	0	0	0	0	0	1	0	0	0	0
	2017	0	1	0	0	0	2	0	0	0	0	0	0
GTD Total Units													
4													
115 - ST. LOUIS CITY	2016	0	0	0	0	0	0	7	3	2	16	4	8
	2017	20	18	15	19	13	15	0	0	0	0	0	0
GTD Total Units													
140													
GTD Grand Total													
1590													

	<u>Current Production</u>	<u>Grant To Date</u>	<u>Total Projected</u>	<u>Projected To Date</u>
Homes	136.26%	133.50%	1,191	1,191

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Fiscal Summary Report

<u>Month</u>	<u>Admin</u>	<u>Insurance</u>	<u>Prog Op</u>	<u>Fin Audit</u>	<u>Leverage</u>	<u>T&TA</u>	<u>Totals</u>
July 2016	\$14,723	\$1,765	\$292,108	\$712	\$2,010	\$5,272	\$316,590
August 2016	\$37,379	\$12,062	\$359,660	\$386	\$9,588	\$9,271	\$428,346
September 2016	\$34,788	\$3,838	\$494,279	\$602	\$1,633	\$9,456	\$544,596
October 2016	\$26,174	\$1,983	\$392,226	\$230	\$8,621	\$6,870	\$436,104
November 2016	\$26,190	\$2,676	\$379,573	\$284	\$8,740	\$13,037	\$430,500
December 2016	\$28,655	\$3,232	\$356,093	\$330	\$8,140	\$2,947	\$399,397
January 2017	\$27,467	\$4,332	\$446,451	\$437	\$6,911	\$8,118	\$493,716
February 2017	\$24,167	\$2,727	\$302,069	\$2,603	\$1,822	\$33,817	\$367,205
March 2017	\$27,259	\$7,242	\$441,444	\$0	\$1,544	\$34,324	\$511,813
April 2017	\$27,384	\$1,479	\$422,423	\$341	\$5,191	\$16,283	\$473,101
May 2017	\$16,974	\$1,053	\$386,825	\$1,069	\$5,274	\$5,065	\$416,260
June 2017	\$24,727	\$5,692	\$249,545	\$2,920	\$2,991	\$4,184	\$290,059
Totals	\$315,887	\$48,081	\$4,522,696	\$9,914	\$62,465	\$148,644	\$5,107,687

GTD Totals

	<u>Budgeted</u>	<u>% of Budget</u>	<u>Actual GTD Expenditures</u>	<u>% of Expended</u>	<u>Amount Available</u>	<u>% of Available</u>
Administration	\$337,914	6.62%	\$315,887	6.18%	\$22,027	0.00%
Insurance	\$54,050	1.06%	\$48,081	0.94%	\$5,969	0.00%
Program Ops	\$4,419,997	86.54%	\$4,522,696	88.55%	\$-102,699	0.00%
Financial Audit	\$13,518	0.26%	\$9,914	0.19%	\$3,604	0.00%
Leveraging	\$70,177	1.37%	\$62,465	1.22%	\$7,712	0.00%
T&TA	\$212,031	4.15%	\$148,644	2.91%	\$63,387	0.00%
Totals	\$5,107,687	100.00%	\$5,107,687	100.00%	\$0	0.00%

Total Grant	\$5,002,310
Carryover Amount	\$105,377
Payments Made to Agency	\$5,107,687
Payments in Progress	\$0
Unreimbursed Grant Balance	\$0
Advance Available	\$0

<u>Average Cost Per Home</u>	<u>GTD</u>	<u>Jun17</u>
Program Operations	\$2,844.46	\$2,012.45
Program Ops w/o H&S	\$1,030.48	\$608.76
Total Expenditures	\$3,212.38	\$2,339.18
Maximum Allowable Program Operations Average:		\$7,105

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

In the Matter of Laclede Gas Company's)	File No. GR-2017-0215
Request to Increase Its Revenue for Gas Service)	Tariff No. YG-2017-0195
In the Matter of Laclede Gas Company d/b/a)	File No. GR-2017-0216
Missouri Gas Energy's Request to Increase Its)	Tariff No. YG-2017-0196
Revenues for Gas Service)	

AFFIDAVIT OF ANNIKA BRINK

CITY OF CHICAGO,)
) SS
STATE OF ILLINOIS)

Annika Brink, of lawful age and being first duly sworn on her oath, states:

1. My name is Annika Brink. I work in the City of Washington, District of Columbia and I am employed by The National Housing Trust as Energy Efficiency Advisor.
2. Attached hereto and made a part hereof for all purposes is my Rebuttal Testimony (regarding Revenue Requirement issues) on behalf of The National Housing Trust, which has been prepared in written form for introduction into evidence in the above-referenced docket before the Missouri Public Service Commission.
3. I hereby swear and affirm that my answers contained in the attached testimony to the questions therein propounded are true and correct.

/s/ Annika Brink
Annika Brink

Subscribed and sworn to me this 16th day of October, 2017

/s/ Victoria Curley
Notary Public

My commission expires: 05/19/21

