

Receipt

Exhibit No.:

Issue:

Witness:

Sponsoring Party:

Case No.:

Weatherization Program

Robert T. Jackson

City of Kansas City, Missouri

Case No. GR-2004-0209

FILED<sup>4</sup>

JUL 13 2004

Missouri Public  
Service Commission

CITY OF KANSAS CITY, MISSOURI

Case No. GR-2004-0209

FILED

MAY 24 2004

REBUTTAL TESTIMONY

Missouri Public  
Service Commission

OF

ROBERT T. JACKSON

Kansas City, Missouri  
May, 2004

Exhibit No. 301  
Case No(s). GR-2004-0209  
Date 7/2/04 Rptr SKM

BEFORE THE PUBLIC SERVICE COMMISSION  
OF THE STATE OF MISSOURI

In the Matter of Missouri Gas Energy=s Tariffs     )  
to Implement a General Rate Increase for     )     Case No. GR-2004-0209  
Natural Gas Service.     )

AFFIDAVIT OF ROBERT T. JACKSON

STATE OF MISSOURI     )  
                                  ) ss.  
COUNTY OF JACKSON     )

I, Robert T. Jackson, of lawful age, and being duly sworn, do hereby depose and state:

1.     My name is Robert T. Jackson. I am presently Weatherization Program Administrator with the City of Kansas City, Missouri, intervener in the referenced matter.

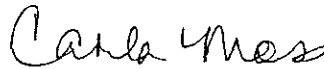
2.     Attached hereto and made a part hereof for all purposes is my rebuttal testimony.

3.     I hereby swear and affirm that my answers contained in the attached testimony to the questions therein propounded are true and correct to the best of my personal knowledge, information and belief.



Robert T. Jackson

Subscribed and sworn to before me, a Notary Public, this 21 day of May, 2004.



Notary Public

My Commission expires:

CARLA MOSS  
Notary Public - Notary Seal  
STATE OF MISSOURI  
Jackson County  
My Commission Expires: May 13, 2007

1  
2  
3 REBUTTAL TESTIMONY OF ROBERT T. JACKSON  
4  
5

6 Q. PLEASE STATE YOUR NAME, TITLE AND BUSINESS ADDRESS?

7 A. My name is Robert T. Jackson. I am the Weatherization Program Administrator  
8 with the City of Kansas City, Missouri Department of Housing and Community  
9 Development Home Weatherization Program. My business address is 11<sup>th</sup> Floor,  
10 City Hall, 414 East 12<sup>th</sup> Street, Kansas City, MO 64106.  
11

12 Q. MR. JACKSON, DID YOU PREVIOUSLY FILE WRITTEN DIRECT  
13 TESTIMONY IN THIS CASE?

14 A. Yes, I did.  
15

16 Q. PLEASE EXPLAIN THE PURPOSE OF YOUR REBUTTAL TESTIMONY.

17 A. Ms. Meisenheimer of the Office of Public Counsel has suggested a new initiative  
18 for energy efficiency and I want to address her proposal from the City's point of  
19 view.  
20

21 Q. WHAT IS MS. MEISENHEIMER'S PROPOSAL?

22 A. On page 9 of her direct testimony on Assistance Program Proposals she  
23 introduces the Pay As You Save (PAYS) program for consideration by the  
24 Commission.  
25

26 Q. WHAT IS THE CITY'S POSITION?

27 A. I want to first remind the Commission of the City's full confidence in the current  
28 low income weatherization program. The City considers the present low income  
29 weatherization program a great success, and urges the Commission to endorse it

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1 as a continuing part of MGE's operations. The benefits of weatherization are  
2 unquestionable. The City's administration of the program, although always  
3 seeking ways to improve, has proven itself more than adequate to meet program  
4 requirements including cooperation with governmental sources of matching  
5 funding.

6  
7 Q. HAS MGE RECOGNIZED THE BENEFITS OF THE LOW INCOME  
8 WEATHERIZATION PROGRAM ADMINISTERED BY THE CITY?

9 A. Yes. I was very encouraged by MGE's willingness in this case to contribute an  
10 additional \$160,000 system wide for low income weatherization. I think this is  
11 indicative of MGE's confidence in the program and in the City's administration of  
12 that program. Yet, as the Commission will remember from my earlier testimony,  
13 I have recommended that the amount of funding dedicated to MGE's service area  
14 that is served by the City alone be increased by \$250,000. Even that increase may  
15 not fully meet the demand for weatherization assistance applied for through my  
16 office.

17  
18 Q. WHAT IS YOUR POSITION ON THE PAYS PROGRAM?

19 A. The City will not oppose the Office of Public Counsel in suggesting PAYS  
20 because the City is not opposed to the concept behind PAYS. The City will  
21 support any energy efficiency program that addresses the needs of our most  
22 vulnerable population. PAYS may have this quality. I must add however, that  
23 any energy efficiency program for lower income customers the Commission may  
24 approve should utilize the service delivery network developed, and the staff and  
25 administrators trained, by DNR.

26

1 Q. DO YOU HAVE AN OPINION ON WHETHER A PAYS PROGRAM CAN  
2 MEET THE PRESENT NEED?

3 A. Yes, I do. In my opinion, the most effective use at this time of increased funding  
4 for MGE's low income programs is to dedicate it all to the existing weatherization  
5 program in the City and to weatherization program administrators in the rest of  
6 MGE's service territories.

7

8 Q. DOES THIS CONCLUDE YOUR REBUTTAL TESTIMONY?

9 A. Yes, it does.