

Exhibit No.:
Issue: Demand-Side Management
Programs, Demand-side Management
funding, Low-income Assistance Programs
Witness: Nathaniel W. Hackney
Type of Exhibit: Rebuttal Testimony
Sponsoring Party: Liberty Utilities
(Midstates Natural Gas) Corp.
d/b/a Liberty Utilities
Case No.: GR-2018-0013
Date Testimony Prepared: April 2018

**Before the Public Service Commission
of the State of Missouri**

Rebuttal Testimony

of

Nathaniel W. Hackney

On Behalf Of

**Liberty Utilities (Midstates Natural Gas) Corp.
d/b/a Liberty Utilities**

April 2018



REBUTTAL TESTIMONY
OF
NATHANIEL W. HACKNEY
LIBERTY UTILITIES
BEFORE THE
MISSOURI PUBLIC SERVICE COMMISSION
CASE NO. GR-2018-0013

TABLE OF CONTENTS

I. INTRODUCTION	1
II. PURPOSE OF TESTIMONY	2
III. COMBINED HEAT AND POWER	3
IV. LOW-INCOME ASSISTANCE PROGRAMS	4
V. RED-TAG REPAIR PROGRAM	5
VI. ENERGY EFFICIENCY FUNDING LEVELS.....	7
VII. ADMINISTRATION OF THE LOW-INCOME	11
WEATHERIZATION ASSISTANCE PROGRAM (“LIWAP”)	11
VIII. ENERGY EFFICIENCY REGULATORY ASSET – RATE BASE.....	13
IX. ENERGY EFFICIENCY AMORTIZATIONS	13
CONTINUATION OF ENERGY EFFICIENCY PROGRAMS	13

REBUTTAL TESTIMONY
OF
NATHANIEL W. HACKNEY
LIBERTY UTILITIES
BEFORE THE
MISSOURI PUBLIC SERVICE COMMISSION
CASE NO. GR-2018-0013

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18

I. INTRODUCTION

Q. PLEASE STATE YOUR NAME AND BUSINESS ADDRESS.

A. My name is Nathaniel W. Hackney. My business address is 602 South Joplin Avenue, Joplin, MO 64802.

Q. BY WHOM ARE YOU EMPLOYED AND IN WHAT CAPACITY?

A. I am employed by Liberty Utilities Services Corp. as the Energy Efficiency Coordinator for Liberty Utilities Central Region, which includes Liberty Utilities (Midstates Natural Gas) Corp. d/b/a Liberty Utilities (“Liberty” or “Company”), The Empire District Electric Company (“Empire”), and Liberty Utilities (Missouri Water) LLC.

Q. PLEASE DESCRIBE YOUR EDUCATIONAL AND PROFESSIONAL BACKGROUND.

A. In December of 2009, I received a Bachelor of Arts from the University of Minnesota’s Hubbard School of Journalism and Mass Communication. I have been employed by the Company for seven years, and accepted my current position in February of 2012. In this job, I interface on behalf of Empire and Liberty with Community Action Program (“CAP”) agencies, regulatory stakeholders, contractors, customers and others in all matters related to Empire’s active portfolios of residential, commercial and industrial energy efficiency programs in Arkansas and Missouri as well as Liberty’s active portfolios of residential and

1 commercial natural gas energy efficiency programs in Iowa and Missouri. I process and
2 approve payment of energy efficiency rebates, retain the data necessary for required
3 periodic evaluations and lead the regulatory stakeholder reporting process. I also assist with
4 the demand-side analysis of Empire’s Integrated Resource Plan (“IRP”), and with the
5 administration, payment, tracking, and customer service functions of Empire’s Solar Rebate
6 program.

7 **Q. HAVE YOU PREVIOUSLY TESTIFIED BEFORE THE MISSOURI PUBLIC**
8 **SERVICE COMMISSION OR ANY OTHER REGULATORY AGENCY?**

9 A. Yes, I have filed direct testimony before the Missouri Public Service Commission¹, Kansas
10 Corporation Commission², and the Arkansas Public Service Commission³.

11 **II. PURPOSE OF TESTIMONY**

12 **Q. WHAT IS THE PURPOSE OF YOUR REBUTTAL TESTIMONY IN THIS**
13 **CASE?**

14 A. In my rebuttal testimony, I will respond to comments of the Missouri Department of
15 Economic Development – Division of Energy (“DE”) witness Jane Epperson regarding
16 Combined Heat and Power (“CHP”), DE Witness Martin R. Hyman’s comments regarding
17 low-income programs and energy efficiency funding levels, DE Witness Sharlet E. Kroll’s
18 comments regarding Administration of the Low-income Weatherization Assistance
19 Program (“LiWAP”), Missouri Public Service Commission Staff (“Staff”) witness John P.
20 Cassidy’s comments regarding costs included in the energy efficiency regulatory asset

¹ Missouri Public Service Commission Case No. ER-2016-0023, in support of Empire’s Energy Efficiency Programs.

² Kansas Corporation Commission Docket No. 13-EPDE-209-TAR, in support of Empire’s Energy Efficiency Rider. Empire’s energy efficiency portfolio in Kansas is no longer active.

³ Arkansas Public Service Commission Docket No. 07-076-TF, in support of Empire’s Energy Efficiency Programs.

1 account, as well as the energy efficiency amortization mechanism, and Staff witness Brad J.
2 Fortson’s comments regarding the continuation of the energy efficiency programs.

3 **III. COMBINED HEAT AND POWER**

4 **Q. PLEASE SUMMARIZE THE SECTION OF THE TESTIMONY OF DE WITNESS**
5 **JANE EPPERSON REGARDING CHP OUTREACH EFFORT.**

6 A. In her testimony, Ms. Epperson describes the benefits and logistics behind Combined Heat
7 and Power (“CHP”), which she describes as “an array of proven technologies that
8 concurrently generate electricity and useful thermal energy from the same fuel source
9 (conventional or renewable)”⁴. In the final section of her testimony⁵, she recommends that
10 Liberty implement a CHP outreach initiative, surveying its customer base for potential
11 candidates and soliciting the services of the Midwest CHP Technical Assistance
12 Partnerships (“CHP TAP”) to potentially conduct a feasibility study.

13 **Q. DOES LIBERTY UTILITIES BELIEVE SUCH A STUDY COULD POTENTIALLY**
14 **BENEFIT THE COMPANY AND ITS CUSTOMERS?**

15 A. Yes. The Company does believe that a study could benefit the company and its customers.

16 **Q. HAS LIBERTY EVER CONDUCTED SUCH A STUDY FOR ANY OF ITS**
17 **PROPERTIES IN THE CENTRAL REGION?**

18 A. Yes. The Empire District Gas Company (“EDG”) utilized the services of CHP-TAP to
19 conduct a feasibility study in its service territory. While EDG has not received the final
20 results of the study, it identified 44 key natural gas customers to offer the CHP feasibility
21 survey to. Of which, only one customer completed both the survey and follow-up call.

⁴ MPSC Case No. GR-2018-0013, *Direct Testimony of Jane Epperson*, Page 4, lines 7-8. ,f

⁵ MPSC Case No. GR-2018-0013, *Direct Testimony of Jane Epperson*, Page 15, line 11, through page 17, line 21.

1 **Q. IS THE COMPANY WILLING TO CONSIDER CONDUCTING A FEASIBILITY**
2 **STUDY FOR THE MIDSTATES SERVICE TERRITORIES?**

3 A. While the Company is willing to consider conducting a feasibility study for the Liberty
4 Utilities (Midstates Natural Gas) Corp. Missouri service territories, we have concerns about
5 the level of participation from our customers. Once the Company receives the final results
6 of the EDG feasibility survey from CHP-TAP, we will further consider if a similar study
7 would be beneficial to the Midstates customers in Missouri.

8 **IV. LOW-INCOME ASSISTANCE PROGRAMS**

9 **Q. PLEASE SUMMARIZE DE WITNESS MARTIN HYMAN'S TESTIMONY**
10 **REGARDING A LOW-INCOME ENERGY ASSISTANCE PROGRAM.**

11 A. Mr. Hyman recommends the introduction of a Low-Income Energy Affordability Program
12 similar to the one currently implemented by Spire. Spire's program offers a monthly bill
13 credit to low-income customers who qualify based on income relative to the Federal
14 Poverty Level. Mr. Hyman recommends that Liberty Utilities offer a similar program with a
15 budget of \$72,600.

16 **Q. DOES LIBERTY UTILITIES SEE THE MERITS OF SUCH A PROGRAM?**

17 A. Of course. Liberty Utilities is committed to offering safe, reliable, and affordable natural
18 gas service to its customers, particularly those with economic challenges. In general low-
19 income energy assistance programs are designed to provide the Company's low-income
20 customers a better chance of keeping up with their bills, allowing them to retain both
21 financial and personal comfort, particularly during the winter season.

22 **Q. DOES LIBERTY UTILITIES BELIEVE THIS PROGRAM WOULD BE WELL-**
23 **SUBSCRIBED?**

1 A. While no program which requires active customer participation under qualification
2 parameters can be a guaranteed success, I believe the Company has customers who could
3 benefit from a program like this, provided that its specific parameters for initial and
4 continued qualification—which would be determined later—were reasonably attainable by
5 the Company’s low-income customers, and did not present them with an overly
6 burdensome application or re-application processes. Additionally, the Company believes
7 that it can take significant time to raise awareness of a new program.

8 **Q. DOES LIBERTY UTILITIES AGREE WITH THE FUNDING LEVEL CHOSEN BY**
9 **MR. HYMAN?**

10 A. As I understand it, Mr. Hyman arrived at this amount based proportionately on the funding
11 levels approved for Spire, and adjusted to reflect the differences in customer counts
12 between Liberty Utilities and Spire. While the Company generally understands Mr.
13 Hyman’s calculations, before we could agree with DE’s proposed budget we would need to
14 do a detailed analysis to ensure that the underlying assumptions used to determine the
15 budget for Spire’s program are applicable to us.

16 **V. RED-TAG REPAIR PROGRAM**

17 **Q. PLEASE DESCRIBE THE RED-TAG REPAIR PROGRAM, AS DISCUSSED IN**
18 **THE TESTIMONY OF MR. HYMAN?**

19 A. Mr. Hyman says, “‘Red Tagging’ refers to the practice of placing a red tag on natural gas
20 appliances that cannot be operated for safety reasons. Unless these appliances are fixed or
21 disconnected from the natural gas system, it is unsafe for a customer to continue using the
22 appliance and natural gas service may be shut off.”⁶ Mr. Hyman suggests that Liberty
23 Utilities implement a program—similar to the one offered by Spire—that would offer

⁶ MPSC Case No. GR-2018-0013, *Direct Testimony of Martin R. Hyman*, Page 6, lines 8-11.

1 rebates to fully or partially fund the repairs or replacement of faulty equipment to customers
2 to customers below a certain income threshold.

3 **Q. DOES LIBERTY UTILITIES CURRENTLY OFFER SUCH A PROGRAM IN ANY**
4 **OF ITS CENTRAL REGION TERRITORIES?**

5 A. Not at this time.

6 **Q. DOES LIBERTY UTILITIES AGREE WITH MR. HYMAN’S ASSESSMENT THAT**
7 **A RED-TAG PROGRAM COULD POTENTIALLY BENEFIT THE COMPANY’S**
8 **LOW-INCOME CUSTOMERS?**

9 A. Absolutely.

10 **Q. DOES LIBERTY UTILITIES AGREE WITH MR. HYMAN’S SUGGESTION THAT**
11 **THE DESIGN PARAMETERS BE SIMILAR TO THOSE OF SPIRE’S RED-TAG**
12 **REPAIR PROGRAM?**

13 A. Liberty Utilities believes that there is a good chance that it would have success offering a
14 program with similar features, qualifications, and incentive amounts. However, during the
15 design of such a program, the Company would like the freedom to modify the design of
16 Spire’s program to better meet the needs of its unique service territory, should such
17 modifications become clear.

18 **Q. WOULD LIBERTY UTILITIES SOLICIT AND CONSIDER THE INPUT OF ITS**
19 **ENERGY EFFICIENCY ADVISORY GROUP (“EEAG”), COMPRISED OF**
20 **REGULATORY STAKEHOLDERS, DURING THIS DESIGN PROCESS?**

21 A. Yes, we believe seeking such input would be an important step in designing a successful
22 program.

1 **Q. WHAT DOES MR. HYMAN RECOMMEND AS THE BUDGET FOR SUCH A**
2 **PROGRAM?**

3 A. Mr. Hyman recommends the program be offered at \$33,000, which would offer assistance
4 to roughly 30 customers.

5 **Q. DOES THIS AMOUNT SEEM REASONABLE?**

6 A. As with a Low-income Energy Assistance Program, there are no guarantees of full
7 subscription when a program requires the customer to voluntarily participate. Provided the
8 program is designed to meet the needs of Liberty Utilities' customers, the Company
9 believes this program would be well-received, and would help to prevent potentially unsafe
10 conditions for such customers. As I previously stated, we would like to work in
11 conjunction with the EEAG to design a program and budget to reflect the needs of our
12 customers.

13 **VI. ENERGY EFFICIENCY FUNDING LEVELS**

14 **Q. PLEASE SUMMARIZE MR. HYMAN'S POSITION REGARDING THE**
15 **COMPANY'S ENERGY EFFICIENCY BUDGET.**

16 A. Mr. Hyman notes that the Company's current energy efficiency budget of \$288,787
17 (\$105,000 of which is earmarked for the low-income weatherization program), was not
18 fully expended. He recommends that a greater effort be made in order to expend this full
19 amount. Mr. Hyman also recommends that the budget for the Company's energy efficiency
20 portfolio be modified to a level equivalent to 0.50% of its average operating revenues for
21 the previous 3-year period. Based on the operating revenues for 2014-2016, this would
22 translate into a budget for the Company's non-weatherization energy efficiency programs

1 of \$258,811⁷, with an additional \$105,000 still earmarked for the low-income
2 weatherization program.

3 **Q. HOW MUCH OF AN INCREASE WOULD THIS REPRESENT FOR THE NON-**
4 **WEATHERIZATION ENERGY EFFICIENCY PROGRAMS OVER THE**
5 **COMPANY'S CURRENT PORTFOLIO?**

6 A. This would be an increase of \$75,024, or just less than 41%.

7 **Q. DID MR. HYMAN'S TESTIMONY LIST ANY FURTHER RECOMMENDATIONS**
8 **FOR LIBERTY UTILITIES' ENERGY EFFICIENCY PORTFOLIO BUDGET?**

9 A. Yes. Mr. Hyman's testimony stipulated that DE would support the Company's request for a
10 decoupling mechanism as described in the Direct Testimony of Liberty Utilities' Witness
11 Robert B. Hevert⁸, if the Company were to increase the budget to a more ambitious level of
12 0.75% of operating revenues, rather than 0.50%. Mr. Hyman rightly stated that decoupling,
13 as a concept, makes the Company agnostic to the individual customer's usage, thus
14 removing the primary disincentive to implementation of energy efficiency programs. Mr.
15 Hyman states that this increase would create a new budget of \$388,217⁹ for the non-
16 weatherization programs in Liberty Utilities' energy efficiency portfolio.

17 **Q. HOW MUCH OF AN INCREASE WOULD THIS REPRESENT FOR THE NON-**
18 **WEATHERIZATION ENERGY EFFICIENCY PROGRAMS OVER THE**
19 **COMPANY'S CURRENT PORTFOLIO?**

20 A. This would be an increase of \$204,430, or slightly more than 111%.

⁷ Rounded to the nearest dollar.

⁸ MPSC Case No. GR-2018-0013, *Direct Testimony of Robert B. Hevert*, Section IV.

⁹ Rounded to the nearest dollar.

1 **Q. WOULD LIBERTY UTILITIES BE OPEN TO PURSUING MR. HYMAN'S**
2 **RECOMMENDATION OF A 111% INCREASE IN ITS ENERGY EFFICIENCY**
3 **BUDGET?**

4 A. Provided that the Commission approves a decoupling mechanism for Liberty Utilities, as
5 described by Company witnesses Tim Lyons and Robert Hevert, or as authorized by the
6 Commission in the recent Spire cases, the Company agrees to consider a target budget level
7 for its energy efficiency programs based on 0.75% of its operating revenue.

8 **Q. GIVEN THE CURRENT DESIGN OF LIBERTY UTILITIES' ENERGY**
9 **EFFICIENCY PORTFOLIO, DO YOU BELIEVE IT IS REALISTICALLY**
10 **ACHIEVABLE TO MEET EITHER THE INCREASED BUDGET OF 41% OR THE**
11 **INCREASED BUDGET OF 111% RECOMMENDED BY DE?**

12 A. No, I do not believe either increase would be realistically achievable with the current
13 portfolio. It would require significant modifications to the current energy efficiency
14 portfolio, which would include any combination of the addition of new programs,
15 dissolution of current programs, increases or decreases to current budgets, or reallocations
16 of budgets amongst programs. Among these changes, Liberty Utilities would recommend
17 some of the funds in the increased portfolio budget be allocated to increase the current
18 weatherization budget of \$105,000, at least commensurate to the total portfolio changes. An
19 increase to the weatherization budget would also better accommodate the recommendations
20 of DE Witness Sharlet E. Kroll, which will be detailed in the following section.

21 **Q. WOULD LIBERTY UTILITIES BE WILLING TO CONSIDER RE-DESIGNING**
22 **ITS ENERGY EFFICIENCY PORTFOLIO TO HAVE A MORE REALISTIC**

1 **CHANCE OF ACHIEVING THE INCREASED SPENDING TARGETS IN MR.**
2 **HYMAN’S RECOMMENDATIONS?**

3 A. Yes, it would, provided it was given adequate time after the completion of this case to re-
4 design a portfolio that could realistically meet these increased spending levels.

5 **Q. WOULD THE COMPANY RECOMMEND THAT A “RED-TAG” PROGRAM AND**
6 **LOW-INCOME ASSISTANCE PROGRAM BE CONSIDERED AMONG THE NEW**
7 **PROGRAMS THAT WOULD POTENTIALLY COMPRISE SUCH A REVAMPED**
8 **PORTFOLIO, IN ORDER TO CREATE THE HIGHER SPENDING TARGETS?**

9 A. Yes. As I stated above, the Company believes a “Red-Tag” program and Low-Income
10 Assistance program could provide benefits provided they are designed to meet the needs of
11 our customers. As such, we would be willing to consider them as new programs to be
12 added to Liberty Utilities’ energy efficiency portfolio to necessitate the higher spending
13 targets.

14 **Q. WOULD LIBERTY UTILITIES SOLICIT AND CONSIDER THE INPUT OF ITS**
15 **EEAG DURING THIS DESIGN PROCESS?**

16 A. Yes. Again we believe involving these stakeholders in the discussion would be an
17 appropriate course of action.

18 **Q. WOULD THE COMPANY REQUEST ANY FURTHER CHANGES TO THE**
19 **CURRENT STRUCTURE OF ITS ENERGY EFFICIENCY PROGRAMS AS**
20 **CONDITIONS TO INCREASING SPENDING TARGETS?**

21 A. Currently, Liberty Utilities collects \$150,000 in energy efficiency expenses in base rates,
22 with any expenditure between \$150,000 and the portfolio spending target of \$288,787 to be
23 tracked in a regulatory asset account to be collected in a future case. The Company requests

1 that if its energy efficiency spending targets are increased, that the amount of energy
2 efficiency expenses collected in base rates be raised commensurate to the increase in the
3 portfolio spending targets. The Company would, of course, agree to carry over to
4 subsequent annual periods or otherwise defer into a regulatory liability any rate allowances
5 that were not spent.

6 **Q. PLEASE SUMMARIZE THE COMPANY'S RESPONSE TO THE**
7 **RECOMMENDATIONS MADE BY DE REGARDING CHANGES TO LIBERTY**
8 **UTILITIES ENERGY EFFICIENCY PROGRAMS.**

9 A. In summary, the Company believes the proposed CHP-TAP feasibility study, "Red Tag"
10 program, Low-Income Assistance programs, and increased energy efficiency funding levels
11 could provide important benefits to Liberty Utilities natural gas customers in Missouri
12 provided they are appropriately designed. And provided that the Commission approves a
13 decoupling mechanism for Liberty Utilities, as described in direct testimony by Company
14 witnesses Tim Lyons and Robert Hevert, or as authorized by the Commission in the recent
15 Spire cases, the Company agrees to use a portion of its energy efficiency budget to
16 complete a detailed analysis of all of these programs and funding targets, to provide
17 recommended changes to the Company's energy efficiency programs and portfolio by no
18 later than the next general rate case.

19 **VII. ADMINISTRATION OF THE LOW-INCOME**

20 **WEATHERIZATION ASSISTANCE PROGRAM ("LIWAP")**

21 **Q. PLEASE DISCUSS THE CHANGES TO LIBERTY'S LIWAP, AS DESCRIBED IN**
22 **THE DIRECT TESTIMONY OF DE WITNESS SHARLET E. KROLL.**

1 A. Ms. Kroll recommends that the Commission allow DE to transition the administration of its
2 Weatherization program back to Liberty Utilities, and allow the Company to create a
3 Request for Proposal (“RFP”) to seek a third-party vendor, or to administer its LiWAP in-
4 house.

5 **Q. DOES LIBERTY UTILITIES OPPOSE DE’S REQUEST TO TRANSITION THE**
6 **ADMINISTRATION OF THE LIWAP OUT OF ITS OFFICE AND BACK TO IN-**
7 **HOUSE PERSONNEL OR A THIRD PARTY ADMINISTRATOR?**

8 A. No, but the Company is very interested in ensuring that this is an orderly transition

9 **Q. DOES LIBERTY UTILITIES HAVE ANY REQUESTS OF DE REGARDING THE**
10 **SPECIFICS OF THIS TRANSITION?**

11 A. Yes. The Company would like for DE to continue administering the program following the
12 resolution of this case to allow adequate time for Liberty Utilities to either align itself with
13 an implementation contractor or design in-house processes for administration of this
14 program. The Company would also request that the Commission allow it the flexibility to
15 modify the spending for this program, as discussed in the previous section.

16 **Q. WHAT OTHER CHANGES TO THE PROGRAM DID MS. KROLL RECOMMEND**
17 **IN HER TESTIMONY?**

18 A. Ms. Kroll recommended that a check-off box be added to both online and paper bills to
19 allow customers the opportunity to voluntarily contribute to the LiWAP.

20 **Q. DOES THE COMPANY AGREE THAT SUCH AN OPTION COULD BE**
21 **POTENTIALLY BENEFICIAL?**

22 A. Yes.

1 **Q. WOULD THE COMPANY CONSIDER ADDING THIS CHECK-OFF BOX TO**
2 **CUSTOMER BILLS IF ALLOWED TO BY THE COMMISSION?**

3 A. Yes, but I believe we need an opportunity to further examine the mechanics and other
4 details of such an initiative. I would also like to obtain the input of the EEAG on this issue
5 before making a final decision.

6 **VIII. ENERGY EFFICIENCY REGULATORY ASSET – RATE BASE**

7 **Q. PLEASE SUMMARIZE THE COMMENTS OF STAFF WITNESS JOHN P.**
8 **CASSIDY REGARDING LIBERTY’S ENERGY EFFICIENCY REGULATORY**
9 **ASSET, AS FOUND IN ITEM J OF STAFF’S COST OF SERVICE REPORT¹⁰.**

10 A. Mr. Cassidy recommends in Staff’s workpapers the disallowance of approximately \$17,000
11 worth of expenses included in the regulatory asset balance, as he believes this amount was
12 included in the regulatory asset balance established in the MPSC Case No. GR-2014-0152,
13 and is double counted.

14 **Q. DOES THE COMPANY DISAGREE WITH MR. CASSIDY’S ASSERTION?**

15 A. No, it does not.

16 **Q. WILL SUBSEQUENT CALCULATIONS INCLUDE MR. CASSIDY’S**
17 **REQUESTED ADJUSTMENT?**

18 A. Yes.

19 **IX. ENERGY EFFICIENCY AMORTIZATIONS**

20 **CONTINUATION OF ENERGY EFFICIENCY PROGRAMS**

21 **Q. PLEASE SUMMARIZE THE COMMENTS OF STAFF WITNESS BRAD J.**
22 **FORTSON¹¹ REGARDING THE CONTINUATION OF LIBERTY’S ENERGY**
23 **EFFICIENCY PROGRAMS AND LIWAP.**

¹⁰ MPSC Case No. GR-2018-0013, *Staff Report – Cost of Service*, Section VII, Item J, page 20.

1 A. Mr. Fortson recommends that Liberty Utilities continue offering both its energy efficiency
2 portfolio and its LiWAP, “as it is currently structured”.

3 **Q. DOES THE COMPANY BELIEVE THAT THIS STATEMENT IS AN INDICATION**
4 **THAT THE STAFF OPPOSES THE KIND OF BUDGETARY INCREASES**
5 **RECOMMENDED IN MR. HYMAN’S TESTIMONY?**

6 A. It is not clear to me from this statement what Staff’s position might be on increasing energy
7 efficiency budgets for the Company as proposed by DE. Given the Company’s position in
8 favor of increasing expenditures for energy efficiency programs and modifying such
9 programs as appropriate based on multiple factors, it would be helpful to have Staff clarify
10 whether it is open to the potential for energy efficiency budgets being increased, and on the
11 subsequent accompanying program design modifications.

12 **Q. DOES THIS CONCLUDE YOUR REBUTTAL TESTIMONY?**

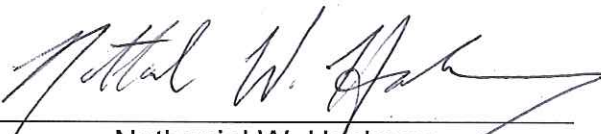
13 A. Yes.

¹¹ MPSC Case No. GR-2018-0013, *Staff Report – Cost of Service*, Section IX, Sub-section F, Item 15, page 77-78.,

AFFIDAVIT OF NATHANIEL W. HACKNEY

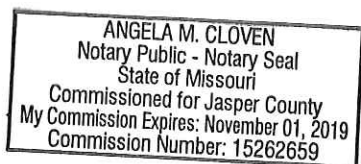
STATE OF MISSOURI)
) ss
COUNTY OF JASPER)

On the 13th day of April, 2018, before me appeared Nathaniel W. Hackney, to me personally known, who, being by me first duly sworn, states that he is the Energy Efficiency Coordinator of Liberty Utilities Services Corp. and acknowledges that he has read the above and foregoing document and believes that the statements therein are true and correct to the best of his information, knowledge and belief.



Nathaniel W. Hackney

Subscribed and sworn to before me this 13th day of April, 2018.





Notary Public

My commission expires: 11/01/19.