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Issues: Income-Eligible Weatherization
Witness: Sharlet E. Kroll
Sponsoring Party: Missouri Department of Economic
Development – Division of Energy
Type of Exhibit: Rebuttal Testimony
Case Nos.: ER-2016-0156

MISSOURI PUBLIC SERVICE COMMISSION

KCP&L GREATER MISSOURI OPERATIONS COMPANY

CASE NO. ER-2016-0156

REBUTTAL TESTIMONY

OF

SHARLET E. KROLL

ON

BEHALF OF

MISSOURI DEPARTMENT OF ECONOMIC DEVELOPMENT

DVISION OF ENERGY

Jefferson City, Missouri

August 15, 2016

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

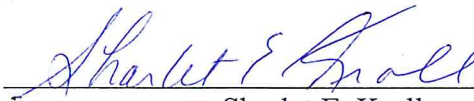
In the Matter of KCP&L Greater Missouri)
Operations Company's Request for) Case No. ER-2016-0156
Authority to Implement a General Rate)
Increase for Electric Service)

AFFIDAVIT OF SHARLET E. KROLL

STATE OF MISSOURI)
) ss
COUNTY OF COLE)

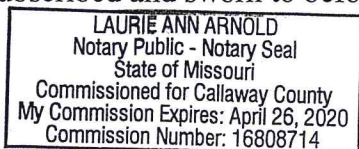
Sharlet E. Kroll, of lawful age, being duly sworn on her oath, deposes and states:

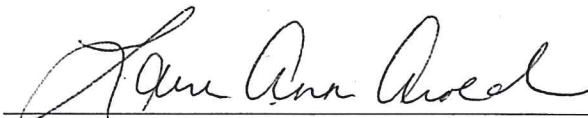
1. My name is Sharlet E. Kroll. I work in the City of Jefferson, Missouri, and I am employed by the Missouri Department of Economic Development, Division of Energy as a Planner II.
2. Attached hereto and made a part hereof for all purposes is my Rebuttal Testimony (Income-Eligible Weatherization) on behalf of the Missouri Department of Economic Development – Division of Energy.
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 knowledge.



Sharlet E. Kroll

Subscribed and sworn to before me this 15th day of August 2016.





Notary Public

My commission expires: 4/26/20

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1 **I. INTRODUCTION**

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

3 A. My name is Sharlet E. Kroll. My business address is 301 West High Street, Suite 720, PO
4 Box 1766, Jefferson City, Missouri 65102.

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

6 A. I am employed by the Missouri Department of Economic Development (“DED”) –
7 Division of Energy (“DE”) as a Planner II Energy Policy Analyst.

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

9 A. I am testifying on behalf of DE, an intervenor in these proceedings.

10 **Q. What are the responsibilities of the Division of Energy?**

11 A. DE is a division within DE which serves as the energy office for the State of Missouri.
12 DE is responsible for the administration of federal programs and grants such as the
13 federal Low Income Weatherization Assistance Program (“LIWAP”). DE is also
14 responsible for administering the federal State Energy Program (“SEP”). The SEP,
15 established by the United States Congress in 1978, is managed nationally by the United
16 States Department of Energy (“USDOE”) and consists of several statewide energy
17 efficiency programs funded by the USDOE. DE powers and duties are outlined in
18 Section 640.150, RSMo.

19 **Q. Have you previously testified before any state regulatory commission?**

20 A. Yes. I have previously testified before the Missouri Public Service Commission
21 (“MPSC” or “Commission”).¹

22

¹ Missouri Public Service Commission Case No. ER-2016-0023, *In The Matter of the Empire District Company’s Request for Authority to Implement a General Rate Increase for Electric Service Provided in Missouri Service Areas.*

1 **Q. Please describe your educational and professional background.**

2 A. I was awarded a dual Bachelor of Arts degree in Sociology and Political Science in 1993
3 from the University of Missouri – Columbia (“UMC”). I have over 22 years of
4 experience in state government and began my career with the State of Missouri in 1993
5 as a Social Service Worker I assigned to the Osage County Division of Family Services
6 (“DFS”) within the Department of Social Services (“DSS”) where I investigated child
7 abuse allegations, conducted home visits, and was responsible for the county foster care
8 program. I transferred to the Division of Aging (“DA”) as a Social Service Worker II in
9 1994 where I conducted hotline investigations, provided protective services, and worked
10 with low-income adults who required assistance with daily living activities. The majority
11 of my responsibilities included home visits to assess medical and physical functionality,
12 monthly protective service home visits, and routine home visits to assess authorized
13 Medicaid funded services. As part of my training with DA, I completed 26 workshop
14 hours of Investigative Technique and Report Writing offered by the University of
15 Missouri Law Enforcement Training Institute and Missouri School of Law. During my
16 service with DA, I was assigned to the pilot Community Outreach Initiative (“COI”)
17 program (1997 – 2000) between DA, DFS, and the two area hospitals in Jefferson City,
18 Missouri. As part of the COI pilot program, I worked as a liaison between DA and the
19 hospitals arranging home services for qualifying at-risk individuals and was trained to
20 receive and process Medicaid applications: Old Age Assistance and Permanently and
21 Totally Disabled. I also served on an advisory team to draft Department policy for the
22 COI pilot program. The COI pilot program ended in 2000 and the DA was moved,
23 through an Executive Order in 2001 by Governor Wilson, to the Department of Health

1 (“DHSS”), and DA is now known as the Division of Community and Home Based
2 Services. In 2002 I accepted an internal promotion as a Health Program Representative.
3 My area of expertise was the development and implementation of statewide public health
4 programs – primarily public health emergency response and volunteerism. I spent nine of
5 those 13 years developing and implementing public health emergency plans as the “State
6 MRC/Volunteer Program” Coordinator. I completed all National Incident Management
7 System curriculum required for public health. I have been a participant and an evaluator
8 for several disaster preparedness exercises. The last two years of my career with DHSS
9 were in the Office of Primary Care and Rural Health where I coordinated the statewide
10 Oral Health Preventive Services Program, which works with schools and communities to
11 address access to care barriers for low-income children. I have experience in federal
12 grant management, program budget management, and contract administration. I joined
13 the DED/DE team in 2015. My responsibilities include representing DE at investor-
14 owned utility (“IOU”) advisory group meetings, conducting DE’s internal budget
15 tracking of energy efficiency (“EE”) measures in Missouri, evaluating and developing
16 policy recommendations on the non-energy benefits and low-income issues related to
17 initiatives under the Clean Power Plan, and work on a project to detail the EE case
18 history of each utility. I completed Building Operator Certification (“BOC”). BOC is a
19 national workforce training and credentialing program that offers job skills in EE
20 building and operation maintenance practices. I have accompanied DE weatherization
21 technical staff on monitoring visits to pre- and post-weatherized homes.

1 **Q. Please describe your work assisting Missouri utilities with energy efficiency**
2 **initiatives.**

3 A. I serve as DE's designated representative to all electric and natural gas IOU
4 collaboratives,² including: Liberty Utilities Energy Efficiency Advisory Group, Missouri
5 Gas Energy - Laclede Gas Company Energy Efficiency Collaborative, Ameren³ Missouri
6 Demand-Side Management Stakeholder Group, Ameren Missouri Natural Gas Energy
7 Efficiency Advisory Group, Kansas City Power and Light Company Demand-Side
8 Management Advisory Group ("DSMAG"), KCP&L Greater Missouri Operations
9 Company ("GMO" or "Company") DSMAG, Summit Natural Gas Energy Efficiency
10 Advisory Group, Empire District Company DSMAG, and Empire District Gas Company
11 DSMAG. Most collaboratives meet quarterly via conference call or web cast or in-
12 person. Three collaboratives meet biannually. Each collaborative addresses different
13 issues, which may include EE measures and programs, weatherization efforts, the
14 potential for co-delivery of programs, and program evaluation.

15 **Q. What information did you review in preparation of this testimony?**

16 A. In preparation of this testimony, I reviewed relevant portions of direct testimonies of
17 Scott H. Heidtbrink, Bradley D. Lutz, and Charles A. Caisley filed on behalf of GMO in
18 this case; relevant portions of direct testimony and Accounting Schedules and Cost of
19 Service Report filed by the Staff of the Missouri Public Service Commission ("Staff");
20 and past tariffs and case documents regarding GMO's EE and weatherization programs

²Missouri Public Service Commission Case No. AO-2011-0035. *In the Matter of the Chairman's Request for A Status Report Regarding Energy Efficiency Advisory Groups and Collaboratives*. Status Report. August 7, 2015.

³ Union Electric Company d/b/a AmerenUE

1 including weatherization reports made to the DSMAG and conversations with the
2 manager of KCP&L GMO's weatherization program.

3 **II. PURPOSE AND SUMMARY OF TESTIMONY**

4 **Q. What is the purpose of your testimony in these proceedings?**

5 A. The purpose of my testimony is to discuss GMO's income-eligible weatherization
6 ("weatherization") program and to discuss DE's role in relation to GMO's weatherization
7 program.

8 **Q. Does DE administer GMO'S weatherization program?**

9 A. No. While DE does administer in-state delivery of LIWAP and some utility-sponsored
10 weatherization programs, DE does not administer GMO'S program.

11 **III. RECOMMENDATIONS**

12 **Q. What recommendations do you have regarding GMO's weatherization program?**

13 A. DE agrees with Staff's recommendation that GMO continue its current weatherization
14 program. However, DE recommends a minimum funding level of \$500,000 and the
15 ability to carry-over any unspent budget into future program years.

16 **Q. Why does DE recommend a funding goal of \$500,000?**

17 A. GMO's weatherization program prior to 2010 was funded at \$150,000⁴ annually. New
18 programs require time and a substantial amount of oversight to implement, and can be
19 slow to achieve benchmark goals. However, GMO's has demonstrated a pattern of
20 continued growth. By 2010, GMO had reported to the DSMAG data showing an increase
21 in the number of weatherization participants from ** _** homes in FY 2010 to ** _**
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⁴ Missouri Public Service Commission Case No. ER-2010-0356, *In the Matter of the Application of KCP&L Greater Missouri Operations Company for Approval to Make Certain Changes in its Charges for Electric Service*, Report and Order, May 4, 2011, page187.

homes in PY 2011.⁵ GMO’s weatherization program was included as part of GMO’s Missouri Energy Efficiency Investment Act (“MEEIA”) Cycle I⁶ program portfolio with a total operation budget of **_____**⁷ in EO-2012-0009. GMO expended **_____**⁸ of their MEEIA Cycle I weatherization budget.

Table 1 ⁹				
	2013	2014	2015	TOTAL
Company Budget Amount	**_____**	**_____**	**_____**	**_____**
Company Expenditures	**_____**	**_____**	**_____**	**_____**
Percent Expended	**_____**	**_____**	**_____**	**_____**

As reflected in Table 1, GMO’s weatherization expenditures for program years (“PY”) 2013-2015 increased significantly each year. GMO expended more than their PY 2014 target budget of \$423,324.¹⁰ This suggests both community need and program momentum and that the program has established a network of outreach to potential participants. DE’s recommendation to fund the program at \$500,000 reasonably reflects GMO’s current level of achievement. Allowing carry-over of any unspent budget will provide flexibility to sustain the average program funding at this level over future years. The PY 2016 budget is part of GMO’s MEEIA Cycle II program portfolio, and weatherization will transition out of the Demand-Side Investment Mechanism (“DSIM”)

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⁵ Company Variance Summary Report presented to Customer Program Advisory Group, January 19, 2012.

⁶ GMO’s MEEIA Cycle I was January 26, 2013 – December 31, 2015.

⁷ Company response to Office of Public Counsel Data Request 2046, page 2.

⁸ Ibid.

⁹ GMO MEEIA DSMAG Report Q4 Final presented to DSMAG on March 9, 2016.

¹⁰ Missouri Public Service Commission Tariff No. JE-2014-0236, KCP&L Greater Missouri Operations Company, Income-Eligible Weatherization, Sheet No. R-63.03.

1 and into base rates in PY 2017 as part of the stipulation and agreement in EO-2015-
2 0241.¹¹ Recovery through base rates will provide assurance that the weatherization
3 program will continue even if GMO’s MEEIA program is terminated in the future, but
4 does reduce flexibility to increase funding to meet increased demand. It is also important
5 to note that as weatherization transitions into base rates, there will be no starting carry
6 over amount. Coupling the target funding level at the level of program expenditures
7 currently achieved with a provision allowing flexibility to carry-over unspent funds is a
8 reasonable method of ensuring the program can continue at its current level of success in
9 meeting the need for weatherization.

10 **IV. GMO’S RESIDENTIAL WEATHERIZATION PROGRAM**

11 **Q. Describe GMO’s weatherization program.**

12 A. GMO has contracts with five community action agencies¹² for PY 2016: West Central
13 Community Action Agency (WCMCAA”), United Services Community Action Agency
14 (“USCAA”), Missouri Valley Community Action Agency (“MVCAA”), Green Hills
15 Community Action Agency (“GHCAA”) d/b/a Community Action Partnership of North
16 Central Missouri (“CAPNCM”), and Community Services, Inc. (“CSI”). Ms. Elena Hill
17 manages GMO’s weatherization program and has reached out on several occasions to DE
18 and CAA’s to discuss both program delivery barriers and improvements. GMO
19 weatherization staff attend meetings of the Committee to Keep Missourians Warm which
20 meets quarterly in Jefferson City to address energy affordability for low- and fixed-
21 income Missourians.

¹¹ Missouri Public Service Commission Case No. EO-2015-0241. *In the Matter of KCP&L Greater Missouri Operations Company’s Filing for Approval of Demand-Side Programs and for Authority to Establish a Demand-Side Programs Investment Mechanism.*

¹² See Table 1 on page 6.

1 **Q. Please discuss GMO’s weatherization contracts.**

2 A. The Company’s CAA contracts are in effect January 1 – December 31 of each year¹³.
 3 The contract specifies: that funds are to be used in a manner consistent with DOE’s
 4 LIWAP, the CAA is to invoice GMO monthly for completed or in-progress
 5 weatherization work, and that GMO may reallocate a portion of the award should the
 6 CAA fail to expend 50% of their award within six months of the program start. The
 7 practice of benchmarking budgets and expenditures is part of contract administration to
 8 ensure funds are fully expended.

9 **Q. What is the distribution of funds to the CAAs serving GMO’s service area?**

10 A. GMO’s CAA contracted amounts for PY 2013-2016 are shown in Table 2.

Table 2 ¹⁴				
Contracting Agency/Entity	2013	2014	2015	2016¹⁵
West Central Missouri Community Action Agency (“WCMCAA”)	\$63,122	\$141,657	\$7,000	\$38,675.00
United Services Community Action Agency (“USCAA”)		\$123,507	\$123,507	\$99,303.75
Missouri Valley Community Action Agency (“MVCAA”)	\$51,870	\$60,406	\$60,406	\$52,325.00
Green Hills Community Action Agency (“GHCAA”) ¹⁶	\$17,850	\$17,850	\$17,850	\$3,412.50
Community Services, Inc. (“CSI”)		\$23,605	\$50,000	\$33,783.75
Community Action Partnership of Greater St. Joseph (“CAPSTJOE”) ¹⁷	\$56,299	\$56,299	\$56,299	\$0.00
City of Kansas City, Missouri	\$193,507	\$0	\$0	\$0.00
TOTALS	\$382,648	\$423,324	\$315,062	\$227,500.00

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¹³ Company Response to Division of Energy Data Request 401, Section F. Contracts for PY 2016 are effective 2 April 1, 2016 – March 31, 2017.

¹⁴ Company Response to Division of Energy Data Request 401, Part F.

¹⁵ The contract time frame for PY 2016 is April 1, 2016 – March 31, 2017.

¹⁶ d/b/a Community Action Partnership of North Central Missouri (“CAPNCM”)

¹⁷ Community Action Partnership of Greater St. Joseph no longer provides weatherization service and Community Services, Inc. has assumed their service territory.

1 For PY's 2015 and 2016, GMO reduced their contracted amounts. As shown in Table 1,
2 the budgeted amount for FY 2015 was ** ____** but only \$315,062 was awarded in
3 contracts (Table 2). For PY 2016, GMO reduced their contracts to \$227,500 even though
4 their weatherization expenditures in FY 2015 exceeded \$423,324 and their budget for PY
5 2016 is ** ____**. ¹⁸

6 **Q. As GMO's weatherization program transitions from MEEIA into base rates, is it**
7 **important for the Company to award contracts that total the program's operating**
8 **budget?**

9 A. Yes. The Company's weatherization expenditures are currently accounted for as part of
10 the DSIM. DE supports the practice of fully contracting all available weatherization
11 funds to the CAA's rather than holding some funds back and making them available mid-
12 contract through an amended contract process. The practice of fully awarding contracts
13 provides better transparency to the CAA's regarding available budget and expectations
14 which helps to mitigate the amount of unspent funds. Also, CAA's may not fully
15 understand that they can request more funds from the Company should they fully expend
16 the amount in their contract. From a contract administration perspective, it is easier to
17 expend funds with a longer versus shorter planning time. Additionally, contract
18 amendments require time to execute and CAA's may not be willing to move forward on
19 weatherization work without a fully executed contract amendment.

20 **NP**

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¹⁸ Missouri Public Service Commission Case No. EO-2015-0241. *In the Matter of KCP&L Greater Missouri Operations Company's Filing for Approval of Demand-Side Programs and for Authority to Establish a Demand-Side Programs Investment Mechanism.* Stipulation and Agreement, Appendix A.

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V. FEDERAL LOW INCOME WEATHERIZATION ASSISTANCE PROGRAM

Q. Please describe the federal low-income weatherization assistance program administered by DE.

A. Congress established the federal LIWAP in response to the energy crisis of the early 1970s. The LIWAP provides cost-effective, energy-efficient home improvements to Missouri’s low income households, especially households in which the elderly, children, those with physical disadvantages, and others hit hardest by high utility costs reside. The program is intended to be a more effective, long-lasting solution to address energy insecurity. Its goal is to lower utility bills and improve comfort while ensuring health and safety. Weatherization is the nation’s largest residential energy efficiency program. From 1977 through June 2016, 188,286 homes in Missouri were weatherized with funds administered by DE. DE maintains an expert staff with certified technical and financial personnel to ensure administration of LIWAP funds in compliance with USDOE program guidelines. Administration includes several components: monitoring contactors (“subgrantees”), fiscal management of multiple funding sources with differing expiration cycles, training and technical support provided to subgrantees, home audits of weatherized home to ensure quality control and adherence with program guidelines, submittal of required reports and inquires to USDOE, and responses to federal and state auditors inquiries. The LIWAP utilizes a “whole house retrofit” approach to building improvement. All participating homes must undergo an energy audit to identify energy efficiency such as weather stripping, pipe wrapping, insulation, lighting upgrades, and infiltration reduction and health and safety opportunities, such as malfunctioning or

1 substandard equipment. Home efficiency and health and safety measures which have
2 been determined to be cost effective or necessary for client health and safety are installed
3 by trained weatherization professionals. Effective July 1, 2015, every weatherized home
4 must pass a thorough, quality-control inspection by the subgrantee before the dwelling
5 can be reported as completed. The final inspection must certify that work was completed
6 in a professional manner and in accordance with the Technical Standards. A Quality
7 Control Inspection (“QCI”) is performed to verify that all repairs and installations were
8 completed properly.

9 **Q. What are the current sources of weatherization funding administered by DE?**

10 A. DE administers funds from four funding streams: USDOE LIWAP, Low-Income Home
11 Energy Assistance Program (“LIHEAP”), Utilicare, and four IOUs. DE annually submits
12 an application to receive USDOE grant funds, which has traditionally been DE’s primary
13 source of LIWAP funding. LIHEAP funds have been transferred to weatherize homes,
14 providing a long-term – versus temporary – solution to addressing the energy burden for
15 low-income clients. At times, DE receives Utilicare funding, which comes from the
16 state’s general revenue and is subject to the state budgetary process. Finally, DE
17 administers weatherization funds on behalf of four Missouri investor-owned electric and
18 natural gas utilities (Ameren Missouri – electric and natural gas, Laclede Gas Company,
19 and Liberty Utilities). DE administers all funds in accordance with USDOE LIWAP
20 guidelines. DE contracts with 17 local CAAs and one non-profit organization as
21 subgrantees. Together, these agencies serve every region in the state. DE provides on-
22 site monitoring and technical oversight of the subgrantees to ensure appropriate
23 utilization of funds, with a goal of fully spending funding allocations each contract cycle.

1 DE did accumulate a surplus (“carry-over”) of utility funds associated with past priority
2 spending of American Recovery and Reinvestment Act (“ARRA”) funding. However, in
3 recent years, DE administered LIWAP has performed weatherization at its full utility
4 funding allocations, and DE is also reducing the amount of carry-over.

5 **Q. Please identify regulated IOU based weatherization fund sources that are not**
6 **administered by DE.**

7 A. GMO self-administers its weatherization program, as do Kansas City Power and Light,
8 Empire District Electric Company, Empire District Gas Company, Missouri Gas Energy,
9 and Summit Natural Gas.

10 **Q. What are some of the benefits of low-income weatherization?**

11 A. Low-income weatherization programs can reduce customer energy use and provide
12 economic benefits for utilities, ratepayers, and local communities. Low-income
13 households are more likely to have difficulty connecting to utility service due to
14 outstanding account balances, have energy disruptions due to shut-offs, and experience
15 negative health and employment outcomes due to challenges related to acquiring and
16 maintaining basic household energy services. Low-income households tend to reside in
17 older, less efficient housing stock. Low-income households are less likely to have the
18 financial resources to make meaningful energy efficiency improvements that will reduce
19 their energy burden. Without weatherization, homeowners may resort to using broken or
20 malfunctioning equipment that can result in fires or carbon monoxide poisoning.
21 Homeowners may go without heating or cooling or forgo needed medical appointments,
22 medications, and/or food. This is particularly concerning for households with occupants
23 who are premature babies, elderly, take medications which can affect core body

1 temperature, or suffer chronic diseases such as asthma, chronic obstructive pulmonary
2 disease, diabetes, or congestive heart failure. Premature babies or babies born with
3 weakened immune systems are at a higher risk for developing respiratory syncytial virus
4 (“RSV”) and asthma.

5 When low-income household parents cannot establish or re-establish utility services
6 under their names, they may employ other measures to gain service such as make-shift
7 connections from neighboring properties, utilization of gas-powered generators or
8 charcoal grills, or creating utility accounts under the name of a minor child. The short-
9 term fixes can have lasting negative health, safety and economic impacts on individuals
10 and within communities.

11 The weatherization program is intended to achieve a long-term energy solution in
12 contrast to LIHEAP bill assistance, which is a temporary stop-gap measure that does not
13 cure the problem of high energy use. Weatherization improves health and safety by
14 enabling the homeowner to afford to heat their home to a comfortable level, and the risk
15 of fire is reduced by eliminating the use of space heaters, cooking ovens, or hot plates to
16 heat homes. Weatherization programs also have a positive impact on local economies
17 through locally made purchases of energy efficiency related materials, equipment, and
18 labor. The housing stock is improved when a home is weatherized, which in turn
19 improves property values for both the homeowner and the community.

20 **Q. Are there utility benefits from low-income energy efficiency services?**

21 A. Yes. Weatherized homes have improved energy efficiency which helps low-income
22 households to better control energy usage and reduce energy bills. When customers can
23 afford their energy bills, there are fewer shut-offs and reconnections, fewer notices and

1 customer calls, reduced collection costs, and lower balances on bad debt.¹⁹ This, in turn,
2 lowers the utility's costs associated with unpaid balances, and consequently results in a
3 positive impact on future rates for all customers.

4 **Q. What is the estimated number of Missouri households currently on waiting lists**
5 **which are served by these five community action agencies?**

6 A. As I stated earlier, DE has contractual relationships with 18 subgrantees. Five of DE's
7 subgrantees are also the CAAs that GMO utilizes to administer its weatherization
8 program. Subgrantees are required to submit reporting elements to DE, such as the
9 number of homes on the subgrantee's waiting list. As of August 2016,²⁰ 446 applicants
10 were on waiting lists with WCMCAA, USCAA, MVCAA, GHCAA, CAPNCM and CSI
11 (Table 2), which represents 21% of the statewide total (2091).

Table 3	
Contracting Agency/Entity	2016 Waiting List
West Central Missouri Community Action Agency	125
United Services Community Action Agency	83
Missouri Valley Community Action Agency	129
Green Hills Community Action Agency	49
Community Services, Inc.	60
TOTALS	446

12
13 **VI. CONCLUSIONS**

14 **Q. Please summarize your testimony.**

15 A. A weatherization program helps communities grow and prosper while promoting energy
16 efficiency, which is good for the customer, the community, the utility, and ultimately

¹⁹ M.Schweitzer. *Oak Ridge national Laboratory*. Nonenergy Benefits From The Weatherization Assistance Program: A Summary of Findings From the Recent Literature, April 2002.

²⁰ Data represents close of business day August 10, 2016.

1 ratepayers. DE supports a GMO administered low-income weatherization program. DE
2 recommends a minimum target funding level of \$500,000 with any unused
3 weatherization funds being carried forward into future budget years. DE supports the
4 practice of fully contracting all available weatherization funds, including any carry-over,
5 to the CAA's.

6 **Q. Does this conclude your testimony?**

7 A. Yes, thank you.