

Exhibit No: _____

Issue(s):

- Gas Bill Affordability,
- Fixed Customer Charge,
- Late Fees,
- Protections for Low-Income and Medically Vulnerable Customers

Sponsoring Party:

Consumers Council of Missouri

DIRECT TESTIMONY OF
JACQUELINE A. HUTCHINSON

Case No. GR-2022-0179

Filed: August 31, 2022

1 **Q. PLEASE STATE YOUR NAME, OCCUPATION, AND BUSINESS**
2 **ADDRESS.**

3 A. My name is Jacqueline A. Hutchinson, and I am the Director of Advocacy for
4 Consumers Council of Missouri (“Consumers Council”). My business address is 3407 S.
5 Jefferson Ave., Saint Louis, MO 63118.

6 **Q. WHAT ARE YOUR QUALIFICATIONS AND EXPERIENCE?**

7 A. I have a BS degree in Business Administration from Washington University in St.
8 Louis, and a MS degree in Urban Affairs and Policy Analysis, from Southern Illinois
9 University in Edwardsville, IL.

10 My career spans more than forty years with Community Action Agencies (CAA’s) in the
11 state of Missouri. I have been responsible for the implementation of Federal, State, and
12 private donation fuel assistance and homeless prevention programs in the St. Louis area.
13 Those programs include Low-Income Home Energy Assistance Programs (LIHEAP) and
14 Community Services Block Grant (CSBG) programs in the St. Louis area. I have worked
15 with low- and moderate-income consumers who cannot afford to pay their utility bills.
16 After retirement from my long career with community action, I joined Consumers Council
17 as staff in 2020. I am currently the Director of Advocacy for Consumers Council.

18 I have also been actively involved in energy policy issues and advocacy for low-income
19 consumers on a local, state, and national level for more than 30 years. Over my career, I
20 have participated as a presenter in numerous educational seminars and conferences

1 focusing on utility issues and how those issues impact consumers, particularly vulnerable
2 consumers.

3 **Q: HAVE YOU TESTIFIED PREVIOUSLY BEFORE THE MISSOURI**
4 **PUBLIC SERVICE COMMISSION?**

5 **A.** I have provided testimony on behalf of low-income Missourians in almost every
6 Missouri Public Service Commission (“Commission” or “PSC”) general rate case
7 impacting the St. Louis area since 1987.

8 **Q. CAN YOU EXPLAIN MORE ABOUT YOUR EXPERTISE, AS IT RELATES**
9 **TO THIS PSC MATTER?**

10 **A.** Most notably my expertise includes the following:

11 **Cold Weather Rule and Affordability Plans**

12 I have provided testimony and/or been a part of negotiations in every Cold Weather Rule
13 proceeding in Missouri, including the rulemaking case that initially created that rule. I have
14 reviewed affordability plans with tiered credits, and low-income rates that have been
15 proposed in other states, and have recommended that the best of such plans be implemented
16 through rate case proceedings in Missouri. I have participated in settlement negotiations
17 with various utilities, worked with Missouri Public Service Commission (Staff), the Office
18 of the Public Counsel (OPC), and nonprofit advocates to develop viable low-income
19 affordability programs, as well as programs that are designed to protect consumers who are
20 vulnerable due to serious medical conditions.

1 **Governor’s Energy Policy Council**

2 In 2003, I was appointed by Governor Bob Holden to the Missouri Energy Policy Council.
3 The initial focus of the Council was to prepare a state report focusing on three key areas: an
4 analysis of Missouri’s current and future energy supplies and demand and impact on low-
5 income consumers; an analysis of the impact on Missouri of standard market design rules
6 proposed by the Federal Energy Regulatory Commission; and recommendations regarding
7 how Missouri state government could demonstrate leadership in energy efficiency.

8 **The PSC Cold Weather Rule and Long-Term Energy Affordability**

9 I was an appointed member of the Cold Weather Rule and Long-Term Energy
10 Affordability Task Force set up in Case No. GW-2004-0452. I worked with this group to
11 establish agreed upon modifications to the Cold Weather Rule in 2004 that provided
12 additional protections to disabled and low-income families and set standards for low-
13 income energy affordability programs.

14 **Q. FOR WHOM ARE YOU PROVIDING TESIMONY IN THIS PROCEDURE?**

15 **A.** I am providing testimony for Consumers Council of Missouri (“Consumers
16 Council”), a nonpartisan, nonprofit corporation. Consumers Council works to build a more
17 inclusive and equitable community through coalition building, collaboration, community
18 education and empowering consumers statewide, and advocating for their interests.

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1 **Q. WHAT TESTIMONY DO YOU OFFER IN THIS CASE?**

2 **A.** Consumers Council opposes the level of the rate increase requested by Spire.
3 Consumers Council also opposes the additional fees and surcharges that Spire proposes to
4 increase. In the wake of the continuing COVID-19 pandemic, and the economic crisis
5 which it has caused for many, any rate increase would amplify the threat to the health and
6 safety for families already struggling to meet their basic needs.

7

8 **Q. HOW ARE NATURAL GAS CONSUMERS FARING TODAY?**

9 **A.** Retail natural gas prices have risen sharply for residential consumers over the past
10 two years and are forecast to remain high at least through 2023. According to the U.S.
11 Department of Energy/Energy Information Administration (EIA), the average residential
12 retail natural gas price in the West North Central Census Division increased from \$8.69
13 per thousand cubic feet by over 50% to \$13.06 in 2022.¹ That price, which forecasts have
14 moderated slightly to \$12.92 in 2023, is projected to remain far above prices from the
15 previous ten-year period.

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17 The most recent EIA residential natural gas price forecast is illustrated below (on the
18 following page).

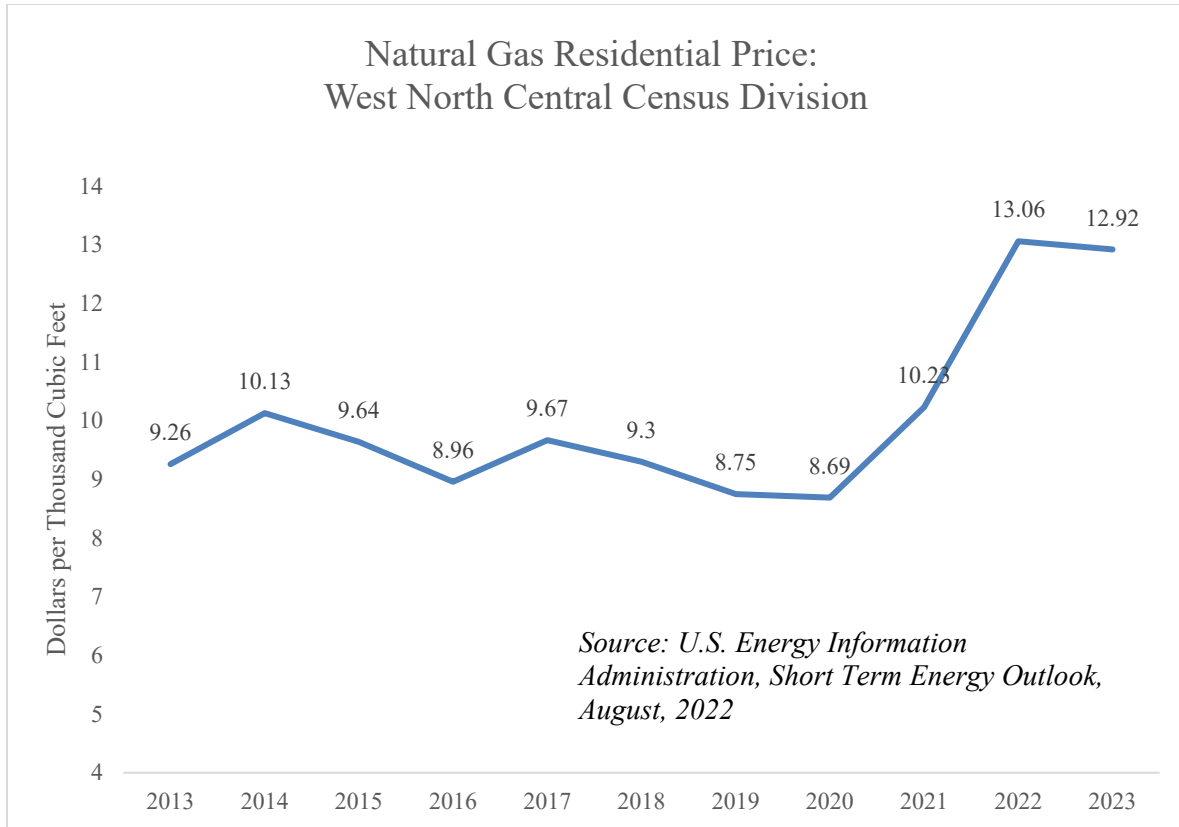
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¹ U.S. Energy Information Administration, Short-Term Energy Outlook, August 9, 2022.

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5 These price increases will exacerbate the already-high home energy burdens experienced
6 by Spire’s low-income customers.

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9 It is widely understood that low-income households experience higher home energy
10 burdens² than their higher income counterparts. On average, a 2015 household living in
11 the Midwest with income below \$20,000 carried a home energy burden of over 12%. By

² The term, “home energy burden” refers to the proportion of household income devoted to home energy and utility expenditures.

1 contrast, a household with income between \$80,000 and \$100,000 carried a burden of about
 2 2%.³ This dynamic is illustrated in the table below (on the next page):

**Percentage of Households Forgoing
 Necessities At least Once/Year to Pay
 Utility Bill: Midwest Census Region**

<i>Household Income</i>	<i>Median Home Energy Burden</i>
Less than \$20,000	12.4%
\$20,000 - \$39,999	5.1%
\$40,000 - \$59,999	3.2%
\$60,000 to \$79,999	2.7%
\$80,000 to \$99,999	2.1%
\$100,000 to \$119,999	1.9%
\$120,000 to \$139,999	1.7%
\$140,000 or more	1.5%

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 6 As demonstrated below, rising prices and home energy affordability challenges bring stark
 7 choices to low-income households. Responses to Department of Energy Surveys
 8 conducted over many years clearly indicate that home energy affordability challenges
 9 cause low-income households to cut back on purchases of other necessities such as food
 10 and medicine in order to stay connected to vital utility services. As shown in the table
 11 below, over 37% of Midwest households with incomes of less than \$20,000 reported
 12 foregoing necessities at least once per year to pay an energy utility bill. Thus, rising prices
 13 and increasing burdens, absent robust programs and policies to protect Spire’s low-income

³ U.S. Energy Information Administration, 2015 Residential Energy Consumption Survey microdata tabulated by National Consumer Law Center.

1 customers, will lead to increased adverse consequences for those customers with very real
 2 impacts on health, safety, and well-being:

**Percentage of Households Forgoing
 Necessities At least Once/Year to Pay
 Utility Bill: Midwest Census Region**

<i>Household Income</i>	<i>% of Households</i>
Less than \$20,000	37.2%
\$20,000 - \$39,999	25.4%
\$40,000 - \$59,999	18.0%
\$60,000 to \$79,999	13.0%
\$80,000 to \$99,999	10.6%
\$100,000 to \$119,999	4.0%
\$120,000 to \$139,999	2.3%
\$140,000 or more	1.1%

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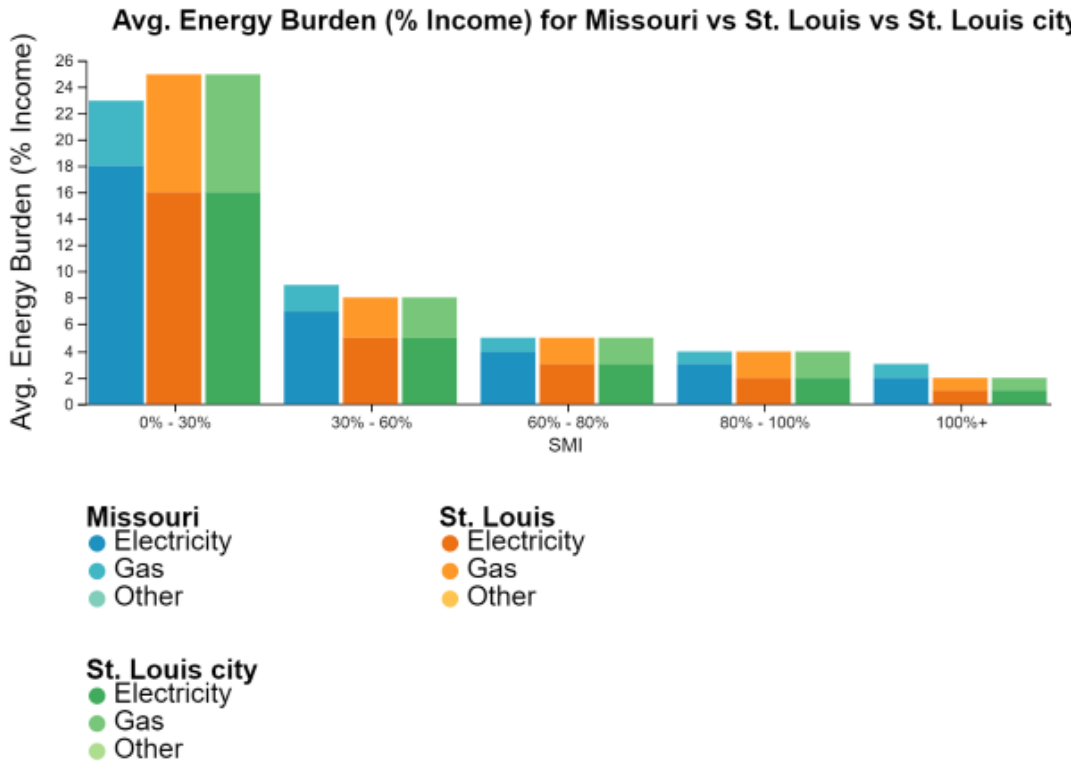
5 **Q. WHAT ARE THE IMPACTS OF POVERTY AND HIGH ENERGY BURDEN**
 6 **IN MISSOURI?**

7 **A.** The following poverty and energy burden facts should be given serious
 8 consideration and factored into any decisions that the Commission makes in this case:

9 20% of all Missourians live below the poverty index of \$23,000 per year for a family of
 10 3.⁴ Many other households with low wage jobs are struggling to make ends meet and are
 11 experiencing high energy burdens. Additionally, the rising costs of food, gas and other
 12 essentials over the past year have added economic stress to the family budget.

⁴ Roger Colton, 2021 Home Energy Affordability Gap.

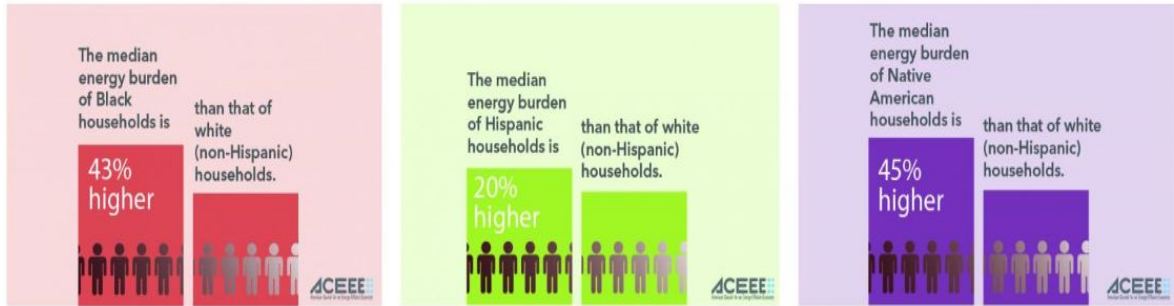
1 Across Missouri, there are great disparities in Energy Burden. The chart below shows the
 2 wide disparities among energy burdens in St. Louis City, County, and Missouri as a whole.
 3 Although energy burden is a multifaceted problem that will require many solutions, it
 4 should be considered and addressed in this Spire rate case.
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7 It is clear that energy burden is higher for certain communities. (See Black households have
 8 an average energy burden of 7.4%. The average upper quartile for energy burden is 14.8%
 9 for low-income households, 12.9% for low-income multifamily households, 14.4% for
 10 Black households, and 12.9% for renting households.⁶
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⁵ Missouri Poverty Facts,

⁶ Muia, Alleviating Energy Burden is Equity in Practice, St. Louis Post-Dispatch, (July 11, 2022),



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The 2021 Home Energy Affordability Gap Missouri report, released April 2022, stated:

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Home energy is a crippling financial burden for low-income Missouri households. Missouri households with incomes of below 50% of the Federal Poverty Level pay 29% of their annual income simply for their home energy bills. Home energy unaffordability, however, is not only the province of the very poor. Bills for households with incomes between 150% and 185% of Poverty take up 7% of income. Missouri households with incomes between 185% and 200% of the Federal Poverty Level have energy bills equal to 6% of income.⁷

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In comparison, the average energy burden for those at the state median income in Missouri is 3% of their income.

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The number of households facing unaffordable home energy burdens is staggering. According to the most recent five-year American Community Survey, nearly 145,000 Missouri households live with income at or below 50% of the Federal Poverty Level and face a home energy burden of 29%. And nearly 189,000 *additional* Missouri households live with incomes between 50% and 100% of the Federal Poverty Level and face a home energy burden of 16%. In 2021 the total number of Missouri households below 200% of the Federal Poverty Level stayed relatively constant from the prior year.⁸

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The Home Energy Affordability Gap in Missouri, the difference between what customers

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can afford to pay and what they are actually billed, exceeded \$765 billion in 2021, up from

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\$630 billion in the previous year.⁹

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⁷ Roger Colton, 2021 Home Energy Affordability Gap.

⁸ Roger Colton, 2021 Home Energy Affordability Gap.

⁹ HEAG Fact Sheet, Roger Colton (2022).

1 **Q. WHAT ARE THE LASTING IMPACTS OF COVID-19 IN COMMUNITIES?**

2 **A.** Missouri’s elderly and disabled residents continue to have increased health risks
3 due to COVID-19, in addition to the rising cost of all other household necessities. Any
4 boost in their household utility costs dramatically increases the “heat or eat” decisions that
5 many Missouri residents are already making at an alarming rate.

6 A recent review of current literature on the impact of COVID-19 disruption to family
7 functioning and well-being demonstrates that the pandemic disproportionately impacted
8 lower-income families, families from ethnic minority and vulnerable groups, and women:¹⁰

9 Both couple and family well-being and relationships are impacted in a variety of
10 ways because of financial stress (citations omitted), and the pandemic has had a
11 significant impact on finances and relationships.” Id. at 208. “The financial impacts
12 of COVID-19 in Spring of 2020 led to fear and uncertainty regarding emergency
13 savings, job security, income fluctuations, ability to pay utilities, and housing
14 expenses, as well as broader concerns over the financial markets (citation omitted).”
15 Id. “While the labor market has shown signs of improvement since the beginning
16 of the pandemic and the immediate financial stressors have eased somewhat, it is
17 longer-term impacts that are still concerning for many . . . As the pandemic lingers,
18 financial concerns have become less pressing as compared with the early months
19 of 2020, but many still worry about their basic needs. This is more prevalent among
20 lower-income households and those with job or wage losses (citation omitted). The

¹⁰ Andrade, C., Gillen, M., Molina, J., and Wilmarth, M. (2022) The Social and Economic Impact of Covid-19 on Family Functioning and Well-Being: Where do we go from here? *Journal of Family and Economic Issues* 43(205-212).

1 recovery appears to be having unbalanced outcomes, likely having longer and more
2 negative effects for those who were already experiencing poverty prior to COVID-
3 19.” Id. at 209.

4 **Q. WHAT ARE YOUR RECOMMENDATIONS IN THIS CASE?**

5 **A.** Gas service is essential to public health, particularly during the long recovery from
6 a pandemic, recent increased rates of inflation, and colder temperatures exacerbated by
7 climate change. Consequently, Consumers Council makes the following recommendations:

- 8 1. In light of Spire’s rate increase granted one year ago, and the existing inflationary
9 economic conditions facing all customers, we recommend that no rate increase be
10 granted in this case unless it can be fully justified and reasonable from the consumer
11 perspective.
- 12 2. Reduce the fixed residential customer charge for consumers in both the Spire East and
13 West regions to \$15 for the purpose of reversing what is an inequitable rate burden on
14 the majority of Spire’s economically vulnerable customers.
- 15 3. Eliminate all reconnection charges, collection trip charges, and punitive late fees.
- 16 4. Increase the income limits for Spire’s Affordability Program to 300% of the federal
17 poverty level. This would be consistent with the eligibility for Ameren Missouri’s
18 Keeping Current/Keeping Cool programs, adopted in 2021. This change would provide
19 needed assistance to many low-wage employees who struggle to make ends meet.
- 20 5. Increase the funding of the Spire Affordability/Payment Partners Program from 2.3
21 million to 3.5 million.

- 1 6. Require Spire to track and report energy burden data, number of cut-offs, collection
2 actions and other data by zip code and date and in a manner that is useful to the general
3 public. Data tracking needs should be determined in collaboration with community
4 groups.
- 5 7. Require Spire to work collaboratively with the Consumers Council, other intervening
6 parties, social service agencies, and other utilities to develop a joint critical medical
7 needs registry. This process should include input from customers who have a chronic
8 or serious medical condition, and medical professionals.

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10 **Q. PLEASE EXPLAIN YOUR CONCERNS REGARDING ANY RATE INCREASE**
11 **FOR SPIRE AT THIS TIME.**

12 **A.** Any increase in residential natural gas rates in this case would hurt the most
13 vulnerable Missourians the most. Families are already suffering from the impact of rising
14 prices and increasing inflation. When inflation is high, everyone pays the price, but
15 research suggest that lower-income families suffer the most. As reported in Read News
16 Time:

17 Typically food, gasoline and housing are a bigger share of total spending for lower-
18 income households than for higher income households,” says Dan Sichel an
19 economist at Wellesley College.

20 Over 35% of Missouri's low-wage workers have been hit hard by record inflation.
21 The price inflation for natural gas adds nearly \$15 per every \$100 for a typical
22 residential bill for piped natural gas service compared to February 2021. Driven
23 primarily by continued high prices for natural gas, home energy costs remain a
24 significant driver of inflation, according to the latest data for February 2022 from
25 the Bureau of Labor Statistics.

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2 According to the spending power of that \$7.25/hour has already dropped
3 dramatically since 2009. In 2021 dollars, \$7.25 was more like \$9.17 per hour in
4 2009. Workers whose wages aren't increasing this year are hit hardest by the rising
5 price of goods and are least likely to be able to absorb any rate increase.¹¹
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8 **Q. PLEASE EXPLAIN YOUR RECOMMENDATION RELATED TO THE FIXED**
9 **CUSTOMER CHARGE.**

10 **A.** Spire's current fixed residential customer charge is extremely high at \$22.00 for
11 Spire East and 20.00 for Spire West. Fixed charges are regressive and hurt many of the
12 elderly, low-income and moderate-income level households, and those who earn below
13 minimum wage. To promote affordability, rates should be based more on energy usage
14 than on fixed amounts. If a consumer's gas delivery rates are based primarily on a
15 volumetric measure, that consumer has a greater ability to lower their bills through energy
16 conservation or energy efficiency measures. Consumers generally prefer the ability to
17 control their bills instead of paying unavoidable fixed fees.

18 Ideally, the rate design for residential customers should include a fixed charge that is based
19 on nothing more than the costs of the meter, customer service, and the line to the dwelling.
20 The new customer charge should be no higher than what those costs can support, or no
21 higher than a fixed rate of \$15.00 per month.

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¹¹ <https://itstimeread.news/Over-35-of-Missouri-s-low-wage-workers-hit-hard-by-record-inflation-394753>

1 **Q. PLEASE EXPLAIN YOUR RECOMMENDATION RELATED TO SPIRE'S**
2 **RECONNECT CHARGES, COLLECTION TRIP CHARGES, AND LATE FEES.**

3 **A.** Consumers Council recommends the elimination of all Spire reconnect charges,
4 collection trip charges, and late fees. Spire has not provided sufficient evidence to justify
5 these charges and fees, nor any evidence that these fees provide a “deterrence” to
6 nonpayment of natural gas bills. There is no evidence that these fees change behavior,
7 rather they merely create an extra cost of service for struggling customers, who are likely
8 to have high energy burdens and be unable to even cover their current bills. These added
9 fees also decrease the impact of limited utility assistance funds, reducing the amount of
10 assistance that can be applied to actual energy usage costs throughout the region and the
11 state.

12 **Q. PLEASE EXPLAIN YOUR RECOMMENDATIONS RELATED TO THE**
13 **SPIRE AFFORDABILITY PROGRAM.**

14 **A.** Consumers Council supports the concept of Spire’s Affordability Program and has
15 observed opportunities for success in the pilot program stage. However, energy assistance
16 providers and other social service agencies have had difficulty identifying and enrolling
17 customers. The current Spire practice of automatically enrolling customers based on their
18 LIHEAP application should be discontinued. Enrollment is occurring sometimes without
19 the consent, prior knowledge or understanding of the program by the customer. There are
20 better ways to ensure that eligible customers have access to the Affordability Program.

21 Consumers Council also recommends that the eligibility for receiving the benefits of this
22 program be increased to 300% of the federal poverty level. This is the eligibility level that
23 many low-income energy programs have adopted around the country. Ameren’s Keeping

1 Current/Keeping Cool programs were recently amended to include a 300% of poverty level
 2 eligibility. Expanding the income level would provide assistance to working poor who
 3 may not receive assistance from LIHEAP.

4 This increase in eligibility, along with the additional funds requested, would allow Spire to
 5 serve some of the 246,000 households who are between 200% and 300% of federal poverty
 6 level, and who may not be eligible for other forms of assistance.

7 Below are charts, based on 2019 census data, that reflect the potential numbers of eligible
 8 customers up to 300% of poverty. Although these number reflect all Missouri families,
 9 they can be extrapolated to reflect poverty levels in the Spire service area.

State of Missouri–HOUSEHOLDS

50% of poverty	57,783
125% of poverty	186,730
150% of poverty	247,232
185% of poverty	329,465
200% of poverty	367,826
300% of poverty	614,362

10 **Q. WHAT ELSE DO YOU RECOMMEND RELATED TO THE SPIRE**
 11 **AFFORDABILITY/PAYMENT PARTNERS PROGRAM?**

12 **A.** The Spire Payment Partners Program should be redesigned to include collaboration
 13 with interested intervenors and agencies providing utility assistance in the Spire service
 14 areas. I believe that several best practices can be borrowed from the successful Keeping
 15 Current Program of Ameren Missouri. Program details are outlined in the Ameren

1 Program Design Study, an independent study performed by APRISE, Inc.¹² This
2 affordability program should provide equitable access and be available to customers who
3 do not receive LIHEAP assistance.

4 I also recommend ongoing bi-annual reviews of the Spire program be performed by an
5 independent outside reviewer, which includes a process for community feedback from
6 those who receive assistance from the Spire Affordability/Payment Partners Program.
7 Recommendations should be utilized to make design improvements to the program that
8 can be assessed by all interested parties.

9 **Q. PLEASE EXPLAIN YOUR RECOMMENDATION REGARDING**
10 **TRACKING AND REPORTING ENERGY BURDEN DATA, NUMBER OF CUT-**
11 **OFFS, COLLECTION ACTIONS, AND OTHER DATA BY ZIP CODE AND DATE**
12 **AND IN A MANNER THAT IS USEFUL TO THE PUBLIC.**

13 **A.** Spire should be ordered to track and report energy burden data, number of cut-offs,
14 collection actions, and other data by zip code and date. Data tracking needs should be
15 determined in collaboration with community groups.

16 The data should be reported in a consistent manner that is useful to the general public as
17 well as to the Public Service Commission. Standard and transparent data collection is the
18 basis of good decision-making, and this requirement will assist the Commission in
19 developing programs that can appropriately assess trends.

20 **Q. PLEASE EXPLAIN YOUR RECOMMENDATION REGARDING A MEDICAL**
21 **REGISTRY PROGRAM?**

22 **A.** Spire should continue to work collaboratively with other utilities, intervenors,
23 interested nonprofits, and medical professionals to develop a transparent and easily

¹² Aprise Study of Ameren Missouri Keeping Current Program (November 2020).

1 accessible medical registry program for Spire customers who have a chronic or serious
2 medical condition, providing heightened procedures to help prevent medical tragedies
3 related to household disconnection from energy services.

4 Consumers Council recommends the adoption of the assumptions and model below, which
5 take into account best practices from other successful Critical Medical Needs programs
6 around the country. This recommended approach borrows generously from the best
7 practices compiled in a recent report from the National Consumer Law Center, entitled
8 “Protecting Seriously Ill Consumers from Utility Disconnections: What States Can Do to
9 Save Lives Now.”¹³

10 Consumers Council recommends the following—

11
12 Assumptions:

- 13 • Utilities are a necessity of modern life, and the loss of utility service can pose a
14 direct threat to the health and well-being of those living in a home where service
15 is terminated.
 - 16 • Exposure to prolonged periods of extreme heat or extreme cold can endanger a
17 person’s health. The danger is much more pronounced for consumers who have a
18 serious illness, are medically vulnerable, rely on medical equipment that requires
19 electricity, or need refrigerated medications.
 - 20 • Seriously ill consumers who have fallen behind on their utility bills may not have
21 the capacity to research and apply for serious illness protection, negotiate
22 reasonable payment plans, and complete applications for federal and charitable
23 bill payment assistance, energy efficiency programs.
 - 24 • Utility commissions should err on the side of protecting lives and health. Utilities
25 run the risk of litigation and reputational harm if the customer needs to be
26 hospitalized or dies due to disconnection of essential utility service while
27 seriously ill.
 - 28 • Coordination among all utilities is essential for protection of customers with
29 serious medical illnesses.
- 30

¹³ Wein, O. B. and Harak, C. (2021) *Protecting Seriously Ill Consumers from Utility Disconnections: What States Can Do to Save Lives Now*, National Consumer Law Center, Inc.: <https://www.nclc.org/issues/energy-utilities-a-communications/protecting-seriously-ill-consumers-from-utility-disconnections.html>.

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1. Who is eligible?

Any customer or permanent household resident with an existing serious illness whose condition would be aggravated by the involuntary disconnection or suspension of utility service.

2. Who can certify?

Physicians, physician assistants, osteopaths, nurse practitioners, hospice care professionals, nurses, or licensed mental health professionals.

The judgment of the certifying professional shall be considered presumptively valid and conclusive, unless successfully challenged in a formal complaint filed by the utility at the Missouri Public Service Commission.

3. Certificate Content (no official form required to document illness):

1) Name and contact information of the certifying party;

2) Service address and name of patient;

3) A statement that the patient resides at the premises in question; and

4) A statement that the disconnection or suspension of utility service will aggravate an existing serious illness.

4. Prompt initiation and adequate duration of protection.

Initial Protection: Customer shall obtain an initial protection from disconnection (whether a reconnection or a suspension of a termination) via a phone call; certification of a serious illness must be submitted within 30 days. Utility shall promptly reconnect services during that 30-day period (if the household was already disconnected) and shall waive the reconnection fee.

Renewal: The initial disconnection protection shall last one year and is renewable for the duration of the medical condition if certified by the appropriate medical or other professional.

5. Adequate Notice and Easily Accessible Notification Process.

Utilities shall notify customers of the serious illness protection rules at initiation of service and whenever collection and disconnection notices are sent. Notices shall be made available in both English and any other language used by substantial numbers of their customers within the utility's territory. Utilities shall also partner with energy assistance community organizations for outreach and referrals to the critical medical needs program.

6. Affirmative Outreach.

Utilities shall train company service representatives and field agents to solicit information regarding any serious illness in the household and they shall have the authority or ability to postpone a termination pending certification of the illness. At

1 least three days before the scheduled disconnection, the utility must attempt to contact
2 the customer or a responsible adult occupant by telephone, in person, or, with the
3 customer's consent, electronically. If the utility succeeds in making contact, it must
4 inform the customer of the serious illness protection. Utilities must include
5 information about serious notification protections in collection and disconnection
6 notices sent to consumers.

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8 **7. Monitoring and Enforcement.**

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10 Utilities shall collect, report, and analyze data regarding the implementation of their
11 serious illness rules. Utilities shall break this information down by zip code or census
12 tract and shall include:

- 13 • Number of serious illness protection requests.
- 14 • Number of serious illness protection requests granted.
- 15 • Number of payment agreements.
- 16 • Number of serious illness account disconnections.
- 17 • Number of serious illness protection reconnections.

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20 **Q. DOES THIS END YOUR TESTIMONY?**

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22 **A. Yes.**

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

In the Matter of Spire Missouri Inc.'s d/b/a)
Spire Request for Authority to Implement a)
General Rate Increase for Natural Gas)
Service Provided in the Company's)
Missouri Service Areas.)

File No. GR-2022-0179

AFFIDAVIT OF JACQUELINE A. HUTCHINSON

I, the undersigned, being duly sworn, states that my name is Jacqueline A. Hutchinson and that the foregoing Direct Testimony of Jacqueline A. Hutchinson, including attachments, was prepared by me on behalf of the Consumers Council of Missouri. This testimony was prepared in written form for the purpose of its introduction into evidence in the above utility case at the Missouri Public Service Commission.

I hereby swear and affirm that the attached testimony is true and correct to my best knowledge, information, and belief, and I adopt said testimony as if it were given under oath in a formal hearing.



Jacqueline A. Hutchinson

Subscribed before me on this 31 day of August, 2022:

