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May 24, 2004

FILED

MAY 24 2004

Missouri Public
Service Commission

The Honorable Dale Hardy Roberts
Secretary/Chief Regulatory Law Judge
Missouri Public Service Commission
P.O. Box 360
Jefferson City, MO 65102-0360

Re: Case No. GR-2004-0209

Dear Judge Roberts:

Please find enclosed for filing in the referenced matter an original and five copies of the Rebuttal Testimony of Robert T. Jackson.

Would you please bring this filing to the attention of the appropriate Commission personnel.

Very truly yours,

NEWMAN, COMLEY & RUTH P.C.

By: Mark W. Comley
Mark W. Comley

MWC:ab
Enclosure
cc: Office of Public Counsel
Robert V. Franson, General Counsel's Office
James C. Swearengen
Jeremiah Finnegan
Stuart W. Conrad
Craig Paulson
Mark H. Ellinger
William D. Geary

Exhibit No.:	
Issue:	Weatherization Program
Witness:	Robert T. Jackson
Sponsoring Party:	City of Kansas City, Missouri
Case No.:	Case No. GR-2004-0209

CITY OF KANSAS CITY, MISSOURI

Case No. GR-2004-0209

REBUTTAL TESTIMONY

OF

ROBERT T. JACKSON

Kansas City, Missouri
May, 2004

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 Natural Gas Service.	)))	Case No. GR-2004-0209

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.

Carla Moss
Notary Public

My Commission expires:

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

REBUTTAL TESTIMONY OF ROBERT T. JACKSON

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

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

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

A. Yes, I did.

Q. PLEASE EXPLAIN THE PURPOSE OF YOUR REBUTTAL TESTIMONY.

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

Q. WHAT IS MS. MEISENHEIMER'S PROPOSAL?

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

Q. WHAT IS THE CITY'S POSITION?

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

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

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

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

Q. WHAT IS YOUR POSITION ON THE PAYS PROGRAM?

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

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

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

Q. DOES THIS CONCLUDE YOUR REBUTTAL TESTIMONY?

A. Yes, it does.