Exhibit No.:	
Issues:	Red Tag Repair Program
Witness:	Jordan R. Elliott
Sponsoring Party:	Missouri Department of Economic Development – Division of Energy
Type of Exhibit:	Surrebuttal Testimony
Case No.:	GR-2019-0077

MISSOURI PUBLIC SERVICE COMMISSION

UNION ELECTRIC COMPANY d/b/a AMEREN MISSOURI

CASE NO. GR-2019-0077

SURREBUTTAL TESTIMONY

OF

JORDAN R. ELLIOTT

ON

BEHALF OF

MISSOURI DEPARTMENT OF ECONOMIC DEVELOPMENT

DIVISION OF ENERGY

Jefferson City, Missouri
July 10, 2019

BEFORE THE PUBLIC SERVICE COMMISSION
OF THE STATE OF MISSOURI

In the Matter of Union Electric Company d/b/a Ameren Missouri's Tariffs to Increase Its Revenues for Natural Gas Service	)))	**File No. GR-2019-0077**

AFFIDAVIT OF JORDAN R. ELLIOTT

STATE OF MISSOURI)
) **ss**
COUNTY OF COLE)

Jordan R. Elliott, of lawful age, being duly sworn on his oath, deposes and states:

1. My name is Jordan R. Elliott. I work in the City of Jefferson, Missouri, and I am employed by the Missouri Department of Economic Development as an Energy Policy Analyst, Planner II, Division of Energy.
2. Attached hereto and made a part hereof for all purposes is my Surrebuttal Testimony 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.

Jordan R. Elliott

Subscribed and sworn to before me this 10th day of July, 2019.

LAURIE ANN ARNOLD
Notary Public - Notary Seal
State of Missouri
Commissioned for Callaway County
My Commission Expires: April 26, 2020
Commission Number: 16808714

Notary Public

My commission expires: 4/26/20

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I. INTRODUCTION

Q. Please state your name and business address.

A. My name is Jordan R. Elliott. My business address is 301 West High Street, Suite 720, PO Box 1766, Jefferson City, Missouri 65102.

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

A. I am employed by the Missouri Department of Economic Development – Division of Energy ("DE") as an Energy Policy Analyst, Planner II.

Q. Have you previously filed testimony before the Missouri Public Service Commission ("Commission") in this proceeding?

A. Yes. I filed Rebuttal Testimony on the Red Tag Repair Program proposed by Union Electric Company d/b/a Ameren Missouri ("Ameren Missouri" or "Company") in this case.

II. PURPOSE OF TESTIMONY

Q. What is the purpose of your Surrebuttal Testimony in this proceeding?

A. The purpose of my Surrebuttal Testimony is to respond to the Rebuttal Testimonies of Company witness Ms. Laureen M. Welikson and Commission Staff ("Staff") witness Ms. Kory J. Boustead. DE supports the Company's proposal to use $25,000 of the Income Eligible Weatherization Assistance Program ("IEWAP") budget for the proposed Red Tag Repair Program. However, DE is also open to consideration of alternative funding sources for the program.

III. RESPONSE TO AMEREN MISSOURI

Q. Ms. Welikson reiterates her recommendation to use $25,000 of the IEWAP budget to support a Red Tag Repair Program.[1] What is DE's response?

A. As stated in the prior Rebuttal Testimony of DE Witness Mr. Martin R. Hyman, DE would accept the reallocation of $25,000 in IEWAP funds to a Red Tag Repair Program,[2] particularly a program that incorporates the recommendations outlined in my Rebuttal Testimony in this case. DE's recommendations would enable the Red Tag Repair Program to support and provide supplement to weatherization assistance efforts through the consideration of energy efficiency when replacing customer space heating equipment.[3]

IV. RESPONSE TO COMMISSION STAFF

Q. What is your response to Ms. Boustead's statement that, "Averaged over the past five years, the Company has spent 90 percent of its [IE]WAP annual program budgets?"[4]

A. The Direct Testimony of DE witness Ms. Sharlet E. Kroll in this case states that, "… the expenditure levels under the IEWAP over the past few years have exceeded 85 percent of available funds."[5] This statement by Ms. Kroll does not indicate an average spend of over 90 percent. IEWAP spending only exceeded 90 percent of the available budget in one program year out of the previous five.[6]

[1] GR-2019-0077 Welikson Rebuttal, page 2, lines 7-8.
[2] GR-2019-0077 Hyman Rebuttal, page 3, lines 10-14.
[3] GR-2019-0077 Elliott Rebuttal, page 6, lines 6-11.
[4] GR-2019-0077 Boustead Rebuttal, page 6, lines 1-2.
[5] GR-2019-0077 Kroll Direct, page 10, lines 3-4.
[6] *Id*, lines 1-2.

In fact, the average spend of the previous five full program years, beginning in 2013-2014 and ending in 2017-2018, is 82.71 percent of the program budget. This difference between the amount budgeted and amount spent would generally support an allocation of $25,000 for a Red Tag Repair Program. The "Amount Unspent" column in Table 1 below substantiates this.

Table 1. Company IEWAP statistics for 2013-2018.

Table 1

YEAR	BUDGET	EXPENDITURE	PERCENT	AMOUNT UNSPENT
2013-2014	$446,206	$276,136	61.89%	$170,070
2014-2015	$433,119	$387,185	89.39%	$45,934
2015-2016	$308,696	$298,917	96.83%	$9,779
2016-2017	$272,772	$238,105	87.29%	$34,667
2017-2018	$297,805	$254,175	85.35%	$43,630
TOTAL	**$1,758,598**	**$1,454,518**	**82.71%**	**$304,080**

Furthermore, if administration of the IEWAP were to transition back to the Company, DE would support allowing the roll-over of unspent IEWAP funds, as noted in Ms. Kroll's Direct Testimony.[7] This practice would allow overages from long years to cover the program's occasional short year.

Q. Staff opposes using $25,000 of the IEWAP budget to support a Red Tag Repair Program.[8] Is DE open to the consideration of other funding sources?

A. Yes.

[7] *Id*, page 20, line 7
[8] GR-2019-0077 Boustead Rebuttal, page 5, lines 19-20 & page 6, line 1

V. CONCLUSIONS

Q. Please summarize your conclusions.

A. While DE supports the Company's proposal to use $25,000 of the IEWAP budget for the proposed Red Tag Repair Program, DE is also open to consideration of alternative funding sources for the program.

Q. Does this conclude your Surrebuttal Testimony?

A. Yes.