

*Exhibit No.:*  
*Issue(s):* Energy Efficiency/  
Low-Income Programs  
*Witness:* Kory J. Boustead  
*Sponsoring Party:* MoPSC Staff  
*Type of Exhibit:* Direct Testimony  
*Case No.:* GR-2021-0320  
*Date Testimony Prepared:* January 24, 2022

**MISSOURI PUBLIC SERVICE COMMISSION**

**INDUSTRY ANALYSIS DIVISION**

**ENERGY RESOURCES DEPARTMENT**

**DIRECT TESTIMONY**

**OF**

**KORY J. BOUSTEAD**

**THE EMPIRE DISTRICT GAS COMPANY,  
d/b/a Liberty (Empire)**

**CASE NO. GR-2021-0320**

*Jefferson City, Missouri  
January 2022*

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**KORY J. BOUSTEAD**  
**THE EMPIRE DISTRICT GAS COMPANY,**  
**d/b/a Liberty (Empire)**  
**CASE NO. GR-2021-0320**

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1           In 2015, I transitioned to the Energy Resources Department where I continued the same  
2 duties as before while adding my participation in the investor owned electric companies  
3 individual Energy Efficiency Advisory Groups as a regulatory stakeholder with the same  
4 involvement as a regulatory stakeholder as my role on the natural gas side.

5           In addition to my regulatory stakeholder role, I am currently serving my second  
6 three-year term as a council member on the Missouri Weatherization Policy Advisory Council  
7 (“MWPAC”) representing Staff in the state annual plan for the Low-Income Weatherization  
8 Assistance Program, federally funded through the U.S. Department of Energy’s Low-Income  
9 Weatherization Assistance Program.

10           In December 1998, I earned a Bachelor of Science degree in Business Administration  
11 with an emphasis in Marketing from Columbia College. I went on to earn a Master of Business  
12 Administration, in Business Administration and Management from William Woods University  
13 in 2001.

14           Prior to joining the Commission, beginning in 2002, I was employed with Ameren  
15 Missouri as a Customer Service Representative in the Jefferson City Call Center. In this role,  
16 I was responsible for answering customer inquiries and requests through the call center  
17 including establishment of new and transfer accounts. I effectively managed customer  
18 complaints, resolving billing issues, and handling trouble calls. I was responsible for  
19 establishing payment agreements, advising customers regarding collection procedures and  
20 responsible for maintaining personal telephone statistics and call volume in excess of company  
21 average. Prior to my employment with Ameren Missouri I worked for Sprint Telephone in  
22 customer service, KRCG-TV in advertising and was the retail store manager for Alamosa PCS  
23 (a Sprint PCS affiliate) in Jefferson City.

24           Q.     Have you previously filed testimony before the Commission?

1 A. Yes. Please refer to Schedule KJB-d1, attached to this Direct Testimony, for a  
2 list of the cases I have filed testimony in.

3 Q. What is the purpose of your direct testimony?

4 A. The purpose of my testimony is to provide an overview of Empire's currently  
5 approved energy efficiency programs and low-income programs and provide recommendations  
6 for the programs going forward.

7 **EXECUTIVE SUMMARY**

8 Q. Please provide a brief overview of your recommendation.

9 A. Staff's recommendation is a two-part recommendation:

10 1. Staff recommends the Commission authorize the Company to engage in  
11 discussions with the regulatory stakeholder's in their Energy Efficiency Advisory Group to  
12 review the performance of the portfolio and adjust or discontinue programs not achieving the  
13 expected participation and budget utilization.

14 2. Staff recommends the Commission authorize the Company to engage in regulatory  
15 stakeholder discussions in regards to the Experimental Low-Income Program's expansion from  
16 the original design for qualifying customer's in the Sedalia service territory to all of the  
17 Company's service territory and make any necessary program changes to be more in-line with  
18 bill assistance programs of today's standards. Staff further recommends the Commission  
19 authorize the continuation of the Low-Income Weatherization Program at the current design  
20 and funding levels.

21 **OVERVIEW OF EMPIRE'S ENERGY EFFICIENCY PORTFOLIO**

22 Q. Please provide an overview of Empire's energy efficiency portfolio.

1           A.     Empire currently offers four energy efficiency programs to its natural gas  
2 customers. The Commission originally approved these programs in Case No. GR-2009-0434<sup>1</sup>.  
3 These programs are:

4           Energy Star Water Heater Program – Sec 9.10 – Sheet No. R-51g

5           This program has an annual budget of \$28,500 with program administration being  
6 handled by Empire. The program’s purpose is to assist customers in reducing their natural gas  
7 use for water heating by providing incentives for high efficiency systems. Incentives cover a  
8 portion of the incremental cost of the high efficiency, ENERGY STAR® qualified system.

9           Energy Star Space Heating Program – Sec 9.11 – Sheet No. R-51h

10          This program has an annual budget of \$51,750 and is administered by Empire. The  
11 program assists customers in reducing their natural gas use for space heating by providing  
12 incentives for high efficiency systems. Incentives cover a portion of the incremental cost of the  
13 high efficiency, ENERGY STAR® qualified system.

14          Home Performance with Energy Star Program – Sec 9.12 – Sheet No. R-51i

15          This program has an annual budget of \$25,250 and is administered by Empire. The  
16 program encourages and facilitates whole-house energy improvements to existing housing.  
17 Empire provides incentives to cover a portion of the cost of the required energy audit and for a  
18 portion of the total cost of installed insulation.

19          Large Commercial Natural Gas Audit & Rebate Program Sec 9.13 – Sheet No. R-51k

20          This program has an annual budget of \$40,000 and is administered Empire. The program  
21 is a direct impact program for large customers in the retrofit and new construction markets.

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<sup>1</sup> Case No. GR-2009-0434 *In the Matter of The Empire District Gas Company of Joplin, Missouri for Authority to File Tariffs Increasing Rates for Gas Service Provided to Customers in the Missouri Service Area of the Company.*

1 Both prescriptive and custom rebates are offered for the installation of natural gas energy  
2 efficiency improvements as well as a reimbursement for the cost of an energy audit that is  
3 performed in support of any measure receiving a rebate.

4 **OVERVIEW OF LOW-INCOME PROGRAMS**

5 Q. Please provide an overview of Empire’s Low-Income Programs.

6 A. Empire currently has two tariffed low-income programs. These programs are  
7 the Experimental Low-Income Program (“ELIP”) and the Low-Income Weatherization  
8 Program (“LIWP”).

9 Experimental Low-Income Program (“ELIP”) –Sheet No. R-51a

10 The Experimental Low-Income Program as established in Case No. GR-2004-0072 and  
11 revised by the Commission in Case No. GR-2009-0434 helps to provide a fixed credit, for  
12 qualified customers residing in Empire’s Sedalia service territory, monthly bills during the  
13 months of November through March. The Missouri Valley Community Action Agency  
14 (“MVCAA”) handles the application process.

15 The eligibility criteria for a customer to participate is an annual income of 125% of the  
16 Federal Poverty Level (“FPL”) or below, home weatherized within the past three years, or  
17 agrees to be weatherized under the Federal Low-Income Weatherization Assistance Program  
18 (“LIWAP”).

19 There are two levels of ELIP credit to be received:

- 20 1. Group A – participants whose annual income has been verified as being from 0 to  
21 50 percent of Federal Poverty Level receives \$60 per month.
- 22 2. Group B – participants whose annual income has been verified as being from 51 to  
23 125 percent of Federal Poverty Level receives \$40 per month.

1 Staff has reviewed the program quarterly reports filed in the Commissions Electronic  
2 Filing Information System (“EFIS”) and has learned thru its participation in the Company’s  
3 EEAG that this program is not performing as expected. This program has not had the participant  
4 enrollment as expected and for several years despite Empire’s efforts to re-educate the MVCAA  
5 in an attempt to get customers to enroll has not resulted in an increase of participation.

6 Low-Income Weatherization Program

7 The Low-Income Weatherization Program (“LIWP”) originally approved by the  
8 Commission in Case No. GR-2009-0434 with an annual budget of \$71,500 is administered by  
9 the Community Action Agencies, also known as Social Agencies, serving Empire’s residential  
10 gas customers.

11 The Low-Income Weatherization Program is designed to provide energy education and  
12 weatherization assistance for lower income customers. The LIWP is intended to assist  
13 customers through conservation, education and weatherization in reducing their use of energy  
14 and to reduce the level of bad debts experienced.

15 This program serves Empire’s residential gas customers. The LIWP follows the  
16 guidelines of the Missouri Department of Natural Resources Low-Income Weatherization  
17 Program.

18 Q. Has Staff reviewed the data as to the performance of the programs?

19 A. Yes, Staff has reviewed the quarterly reports filed in the Commission’s EFIS  
20 since the implementation of the programs on April 1, 2010. In addition to the quarterly reports,  
21 Staff also participates in Empire’s EEAG semi-annual meetings and has participated in the  
22 discussions of the performance of each program.



1           The portfolio overall has experienced a variety of results based on its program offerings.  
2           The Low-Income Weatherization program, ENERGY STAR® Water Heating, and ENERGY  
3           STAR® Space Heating, have achieved significant participation. The participation for these  
4           programs is detailed in quarterly reports filed in EFIS. For a variety of reasons, The Home  
5           Performance with ENERGY STAR®, Large Commercial Natural Gas Audit and Rebate  
6           Program, and Building Operator Certification programs struggled for participation.

7           **STAFF RECOMMENDATION**

8           Q.       What is Staff's recommendation for the energy efficiency portfolio in this case?

9           A.       Staff recommends Empire re-evaluate its program offerings and discontinue the  
10          programs that have not been achieving the performance goals and participation, such as those  
11          listed above. Staff further recommends Empire to work toward aligning its program offerings  
12          with those offered in the Liberty Utility Energy Efficiency Portfolio.

13          Q.       Does Staff have any recommendation for the low-income programs?

14          A.       Yes, Staff recommends Empire re-evaluate the Low-Income Pilot Program and  
15          the limited participation due to only available to customers in the Sedalia service territory and  
16          make it available to all eligible participants within its service territory that qualify to ensure  
17          achieving the most participation possible. Staff further recommends the Commission to  
18          approve the continuation of the Low-Income Weatherization Program at the current funding  
19          levels and design.

20          Q.       Does this conclude your direct testimony?

21          A.       Yes it does.

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

In the Matter of The Empire District Gas                    )  
Company's d/b/a Liberty Request to File Tariffs        )  
to Change its Rates for Natural Gas Service            )            Case No. GR-2021-0320

**AFFIDAVIT OF KORY J. BOUSTEAD**

STATE OF MISSOURI        )  
  )  
COUNTY OF COLE         )            ss.

COMES NOW KORY J. BOUSTEAD and on her oath declares that she is of sound mind and lawful age; that she contributed to the foregoing *Direct Testimony of Kory J. Boustead*; and that the same is true and correct according to her best knowledge and belief.

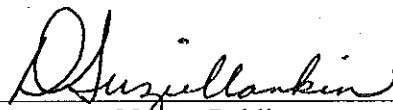
Further the Affiant sayeth not.

  
KORY J. BOUSTEAD

**JURAT**

Subscribed and sworn before me, a duly constituted and authorized Notary Public, in and for the County of Cole, State of Missouri, at my office in Jefferson City, on this 24<sup>th</sup> day of January 2022.

D. SUZIE MANKIN  
Notary Public - Notary Seal  
State of Missouri  
Commissioned for Cole County  
My Commission Expires: April 04, 2025  
Commission Number: 12412070

  
Notary Public

**List of Previous Testimony Filed**

**Kory J. Boustead**

<b>Date Filed</b>	<b>Issue</b>	<b>Case Number</b>	<b>Case Name</b>
<b>05/30/2014</b>	<b>Direct - Staff Report - Low Income Weatherization Programs, Energy Efficiency, Service Line Extension</b>	<b>GR-2014-0086</b>	<b>Summit Natural Gas of Missouri, Inc.</b>
<b>06/06/2014</b>	<b>Direct - Staff Report - Low Income Weatherization Programs, Energy Efficiency, Main Line Extension</b>	<b>GR-2014-0152</b>	<b>Liberty Utilities</b>
<b>07/11/2014</b>	<b>Rebuttal - Energy Efficiency, Low Income Weatherization Program</b>	<b>GR-2014-0086</b>	<b>Summit Natural Gas of Missouri, Inc.</b>
<b>07/30/2014</b>	<b>Rebuttal - Low Income Weatherization Programs, Energy Efficiency, Main Line Extension</b>	<b>GR-2014-0152</b>	<b>Liberty Utilities</b>
<b>08/08/2014</b>	<b>Surrebuttal - Low Income Weatherization Program</b>	<b>GR-2014-0086</b>	<b>Summit Natural Gas of Missouri, Inc.</b>
<b>12/05/2014</b>	<b>Direct - Staff Report - Low Income Keeping Current Pilot Program</b>	<b>ER-2014-0258</b>	<b>Ameren Missouri</b>
<b>02/06/15</b>	<b>Surrebuttal - Low Income Keeping Current Pilot Program</b>	<b>ER-2014-0258</b>	<b>Ameren Missouri</b>

cont'd Kory J. Boustead

<b>Date Filed</b>	<b>Issue</b>	<b>Case Number</b>	<b>Case Name</b>
04/03/2015	Direct - Staff Report - Economic Relief Pilot Program, Low Income Weatherization Program	ER-2014-0370	Kansas City Power & Light Company
03/25/2016	Direct - Staff Report - Low Income Programs, Low Income Weatherization Program	ER-2016-0023	The Empire District Electric Company
05/12/2016	Rebuttal - Low Income Weatherization Program	ER-2016-0023	The Empire District Electric Company
07/15/2016	Direct- Staff Report – Income-Eligible Weatherization, Economic Relief Pilot Program	ER-2016-0156	KCP&L Greater Missouri Operations Company
09/02/2016	Surrebuttal – Income-Eligible Weatherization, Economic Relief Pilot Program	ER-2016-0156	KCP&L Greater Missouri Operations Company
11/30/2016	Direct – Staff Report – Income-Eligible Weatherization, Economic Relief Pilot Program	ER-2016-0258	Kansas City Power & Light Company
12/09/2016	Direct – Staff Report - Low Income Keeping Current Pilot Program, Low Income Weatherization Assistance Program	ER-2016-0179	Ameren Missouri
01/20/2017	Rebuttal – Low Income Weatherization Program	ER-2016-0179	Ameren Missouri

<b>Date Filed</b>	<b>Issue</b>	<b>Case Number</b>	<b>Case Name</b>
02/28/2018	Staff Report - Emission Allowances and Interest	EO-2018-0067	Staff's Sixth Fuel Adjustment Clause Prudence Review Report – Ameren Missouri
03/16/2018	Direct – Staff Report – Tariff Organization	GR-2018-0013	Liberty Utilities
06/19/2018	Direct – Staff Report – Income Eligible Weatherization	ER-2018-0245	Kansas City Power & Light Company
04/30/2018	Direct – Staff Report – Interest	EO-2018-0155	First Prudence Review for Cycle 2 of Costs Related to the Demand-Side Programs for the Electric Operations of Union Electric Company, d/b/a Ameren Missouri
06/19/2018	Direct – Staff Report - Income Eligible Weatherization	ER-2018-0246	KCP&L Greater Missouri Operations Company
08/30/2018	Rebuttal – Low-Income Programs and Tariff design	EO-2018-0122	Ameren Missouri's 3 <sup>rd</sup> Filing to Implement Regulatory Changes in Furtherance of Energy Efficiency as Allowed by MEEIA
09/05/2018	Staff Report – Interest, Renewable Energy Credit Revenue and Plant Outages	EO-2018-0244	In the Matter of the Seventh Prudence Review of Costs Subject to the Commission Approved Fuel Adjustment Clause of The Empire District Electric Company
09/17/2018	Surrebuttal – Low-Income Programs and Tariff design	EO-2018-0122	Ameren Missouri's 3 <sup>rd</sup> Filing to Implement Regulatory Changes in Furtherance of Energy Efficiency as Allowed by MEEIA

Date Filed	Issue	Case Number	Case Name
02/28/2019	Staff Report – Renewable Energy Credits	EO-2019-0067	In the Matter of the Eighth Prudence Review of Costs Subject to the Commission-Approved Fuel Adjustment Clause of KCP&L Greater Missouri Operations Company
02/28/2019	Staff Report – Renewable Energy Credits	EO-2019-0068	In the Matter of the Second Prudence Review of Costs Subject to the Commission-Approved Fuel Adjustment Clause of Kansas City Power and Light Company
4/19/2019	Staff Direct Cost of Service Report – Energy Efficiency, Low-Income Programs & Low-Income Weatherization	GR-2019-0077	In the Matter of Union Electric Company d/b/a Ameren Missouri’s Tariffs to Increase its Revenues for Natural Gas Service
6/6/2019	Rebuttal Testimony - Renewable Energy Credits	EO-2019-0067	In the Matter of the 8 <sup>th</sup> Prudence Review of Costs Subject to the Commission-Approved Fuel Adjustment Clause of KCP&L Greater Missouri Operations Company

Date Filed	Issue	Case Number	Case Name
6/7/2019	Rebuttal Testimony – Energy Efficiency, Low-Income Programs and Low-Income Weatherization	GR-2019-0077	In the Matter of Union Electric Company d/b/a Ameren Missouri’s Tariffs to Increase its Revenues for Natural Gas Service
7/10/2019	Surrebuttal Testimony - Energy Efficiency, Low-Income Programs & Low-Income Weatherization	GR-2019-0077	In the Matter of Union Electric Company d/b/a Ameren Missouri’s Tariffs to Increase its Revenues for Natural Gas Service
7/22/2019	Cross-Rebuttal Testimony – Renewable Energy Credits	EO-2019-0067	In the Matter of the 8 <sup>th</sup> Prudence Review of Costs Subject to the Commission-Approved Fuel Adjustment Clause of KCP&L Greater Missouri Operations Company
12/04/2019	Staff Direct Cost of Service Report – Energy Efficiency, Low-Income Programs & Low-Income Weatherization	ER-2019-0335	In the Matter of Union Electric Company d/b/a Ameren Missouri’s Tariffs to Decrease Its Revenues for Electric Service

Date Filed	Issue	Case Number	Case Name
01/15/2020	Staff Direct Cost of Service Report – Low-Income Programs & Low-Income Weatherization	ER-2019-0374	In the Matter of The Empire District Electric Company's Request for Authority To File Tariffs Increasing Rates for Electric Service Provided to Customers in its Missouri Service Area
01/21/2020	Rebuttal Testimony – Energy Efficiency, Low-Income Programs and Low-Income Weatherization	ER-2019-0335	In the Matter of Union Electric Company d/b/a Ameren Missouri's Tariffs to Decrease Its Revenues for Electric Service
05/12/2021	Staff Direct Cost of Service Report – Energy Efficiency Programs, Low-Income Weatherization & Low-Income Programs	GR-2021-0108	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 Area
06/17/2021	Rebuttal Testimony – Energy Efficiency, Low-Income Programs	GR-2021-0108	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 Area
09/03/2021	Staff Direct Cost of Service – Low Income Weatherization & Low Income Programs	ER-2021-0240	In the Matter of Union Electric Company d/b/a Ameren Missouri's Tariffs to Adjust Its Revenues for Electric Service



Date Filed	Issue	Case Number	Case Name
10/15/2021	Rebuttal Testimony – Low Income Programs	ER-2021-0240	In the Matter of Union Electric Company d/b/a Ameren Missouri's Tariffs to Adjust Its Revenues for Electric Service
09/03/2021	Staff Direct Cost of Service Report – Energy Efficiency, Low Income Weatherization	GR-2021-0241	In the Matter of Union Electric Company d/b/a Ameren Missouri's Tariffs to Adjust its Revenues for Natural Gas Service
10/15/2021	Rebuttal Testimony – Low Income Programs	GR-2021-0241	In the Matter of Union Electric Company d/b/a Ameren Missouri's Tariffs to Adjust its Revenues for Natural Gas Service
10/29/2021	Staff Direct Cost of Service Report – Energy Efficiency, Low Income Weatherization and Low Income Programs	ER-2021-0312	In the Matter of the Request of The Empire District Electric Company d/b/a Liberty for Authority to File Tariffs Increasing Rates for Electric Service Provided to Customers in its Missouri Service Area
12/22/2021	Rebuttal Testimony - Low Income Programs	ER-2021-0312	In the Matter of the Request of The Empire District Electric Company d/b/a Liberty for Authority to File Tariffs Increasing Rates for Electric Service Provided to Customers in its Missouri Service Area