Exhibit No.: Issues: Energy Efficiency Weatherization Witness: Kory Boustead Sponsoring Party: MO PSC Staff Type of Exhibit: Rebuttal Testimony Case No.: GR-2014-0086 Date Testimony Prepared: July 11, 2014

MISSOURI PUBLIC SERVICE COMMISSION

REGULATORY REVIEW DIVISION Tariff, Safety, Economic & Engineering Analysis

REBUTTAL TESTIMONY

OF

KORY BOUSTEAD

SUMMIT NATURAL GAS OF MISSOURI, INC.

CASE NO. GR-2014-0086

Jefferson City, Missouri July 2014

BEFORE THE PUBLIC SERVICE COMMISSION

OF THE STATE OF MISSOURI

In the Matter of Summit Natural Gas of) Missouri, Inc.'s Filing of Revised Tariffs) To Increase its Annual Revenues For) Natural Gas Service

File No. GR-2014-0086

AFFIDAVIT OF KORY BOUSTEAD

STATE OF MISSOURI)) ss COUNTY OF COLE)

Kory Boustead, of lawful age, on her oath states: that she has participated in the preparation of the following Rebuttal Testimony in question and answer form, consisting of <u>5</u> pages of Rebuttal Testimony to be presented in the above case, that the answers in the following Rebuttal Testimony were given by her; that she has knowledge of the matters set forth in such answers; and that such matters are true to the best of her knowledge and belief.

Subscribed and sworn to before me this 10^{10} day of July, 2014.

LAURA BLOCH Notary Public - Notary Seal State of Missouri Commissioned for Cole County My Commission Expires: June 21, 2015 Commission Number: 11203914

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1	REBUTTAL TESTIMONY
2	OF
3	KORY BOUSTEAD
4	SUMMIT NATURAL GAS OF MISSOURI, INC.
5	CASE NO. GR-2014-0086
6	Q. Are you the same Kory Boustead who filed in Staff's Cost of Service report?
7	A. Yes I am.
8	EXECUTIVE SUMMARY
9	Q. What is the purpose of your rebuttal testimony?
10	A. My Rebuttal Testimony will address 1) The issue of Residential Natural Gas
11	Efficiency Incentive Program contained in the Direct Testimony of witness Martha Wankum,
12	Summit Natural Gas Company; and 2) The issue of Energy Efficiency and Low-Income
13	Weatherization Programs funding contained in the Direct Testimony of witness John
14	Buchanan, Department of Economic Development, Division of Energy.
15 16	<u>RESIDENTIAL NATURAL GAS ENERGY EFFICIENCY INCENTIVE</u> <u>PROGRAM</u>
17	Q. Please explain the natural gas energy efficiency incentive program proposed by
18	Summit Natural Gas of Missouri, Inc. ("SNG").
19	A. SNG witness Martha Wankum "requests approval to offer cost-effective
20	energy efficiency rebates to new and current residential customer who purchase high
21	efficiency furnaces and/or programmable thermostats. The associated tariff sheet filed by
22	SNG is Sheet No. 89, P.S.C. MO No 3. The program would have an annual budget cap of

1 \$15,000. The proposed program would offer customers the availability of two energy 2 efficiency rebates as summarized below" 3 Table 2: Residential Natural Gas Energy Efficiency Incentive Program 4 Measure **Rebate Amount** 5 Furnace (AFUE 95%) \$300 Programmable Thermostat \$25 6 7 (Direct Testimony, Martha Wankum, January 2, 2014, page 16, line 3-9). 8 Q. Are the proposed energy efficiency measures cost-effective? 9 A. "Yes, the proposed measures are cost-effective. Both proposed measures 10 passed benefit cost tests with a score greater than one (1), including both the Total Resource Cost Test ("TRC") and the Utility Cost Test ("UCT") as shown below". 11 12 Table 3: Benefit/Cost Tests (Low Growth) 13 **Measure Level TRC** UCT Measure TRC+ Admin 14 1.04 Furnace 1.29 1.62 1.69 Thermostat 1.3 1.69 15 16 (Direct Testimony, Martha Wankum, page 17, lines 21-24 and page 18, lines 1-5). 17 Q. Does Staff recommend the proposed energy efficiency program? No, while Staff agrees SNG should have another energy efficiency incentive 18 A. 19 program, as the Company did when it was Southern Missouri Natural Gas ("SMNG"), it 20 should have a higher annual amount allocated to the program than the \$15,000 annual budget 21 cap proposed by SNG. The Experimental Water Heater and Furnace Rebate Program through

23 \$15,000 and anticipated annual participants of 100-150. In May 2006 the programs estimated

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SMNG became effective in December 2005 with an annual estimated cost of \$10,000-

annual cost increased to \$10,000-\$20,000 with the number of anticipated annual participants
 remaining at 100-150. Then in January 2011 the estimated cost of the program was increased
 to \$20,000-\$40,000 annually and anticipated annual participants increased to 200-300. The
 rebates were processed in house and given as a credit on the SMNG customer's bill.

5 Staff would like the Commission to authorize a natural gas energy efficiency program 6 and a low-income weatherization assistance program that will be ratepayer funded through a 7 regulatory asset account. The cost booked to these accounts will be analyzed in the next rate 8 case for prudency. The potential components of the energy efficiency program would include 9 energy efficiency education, rebates on energy efficient gas appliances that are cost effective and have a TRC of one (1) or more, and rebates and /or low-interest financing for building 10 11 shell improvements. In my direct testimony I recommended the Commission authorize an 12 Energy Efficiency Advisory Group ("EEAG") to oversee the design, implementation and 13 evaluation of the energy efficiency and low-income customer weatherization programs.

Q. Who will administer the funds for the low-income customer weatherizationprogram?

16 A. The funds for the low-income customer weatherization program would be 17 administered by the Department of Economic Development, Division of Energy ("DE") in 18 conjunction with the federal and state funds they administer for the weatherization of homes 19 of low-income Missouri families. On average, the cost to weatherize a home in Missouri is 20 \$7.000. The DE low-income weatherization has demonstrated an ability to effectively 21 weatherize homes of low-income families in Missouri, and the Commission has been 22 authorizing ratepayer-funded low-income customer weatherization for 20 years. Natural gas 23 energy efficiency programs at other Missouri jurisdictional utilities have been in place several

years and have been effective in promoting the utilization of higher efficiency gas appliances
 and building shell improvements.

3RECOMMENDED LEVEL OF FUNDING FOR ENERGY EFFICIENCY4PROGRAMS AND LOW INCOME WEATHERIZATION PROGRAM

Q. Does Staff agree with the level of funding proposed in the direct testimony of
John Buchanan, Department of Economic Development, Division of Energy?

7 A. No, while we agree funding should be based on annual revenues, we do not 8 agree to the direct testimony of witness John Buchanan with Department of Economic 9 Development, Division of Energy that "Low Income Weatherization Assistance funding 10 should be in addition to the 0.5 percent target funding level for energy efficiency." (Direct 11 Testimony of John Buchanan, Department of Economic Development, Division of Energy, page 13, lines 9-11.) Staff proposes the goal of 0.5 percent of annual revenues as the target 12 13 level for both energy efficiency and Low-Income Weatherization assistance program as has 14 been calculated for other company programs in the past. A ramp-up period of three (3) years 15 is appropriate to allow SNG to form the EEAG, develop cost-effective programs, submit 16 tariffs for approval and allow time to advertise the measures in the natural gas energy efficiency programs. At the end of the three (3) year period SNG should reach the goal of 0.5 17 18 percent of annual revenues for Low-Income Weatherization assistance program and energy 19 efficiency initiatives.

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Q. What is Staff's recommendation for the Energy Efficiency rebate program and level of funding for the energy efficiency programs and low income weatherization program?

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A.

Staff recommends the Commission:

1. Authorize a natural gas energy efficiency program and a low-income weatherization program that will be ratepayer funded through a regulatory asset

account with a target goal of 0.5 percent of annual revenues to be reached within three (3) years.

2. Authorize an Energy Efficiency Advisory Group to oversee the design, implementation and evaluation of the energy efficiency and low-income weatherization programs.

- Q. Does this conclude your rebuttal testimony?
 - A. Yes, it does.