Exhibit No.:

Issues:

Low Income Weatherization

Witness:

Joe Gassner

Sponsoring Party:

Missouri Department of Economic

Development - Division of Energy

Type of Exhibit:

Rebuttal Testimony

Case No.:

GR-2014-0086

MISSOURI PUBLIC SERVICE COMMISSION

SUMMIT NATURAL GAS OF MISSOURI, INC.

CASE NO. GR-2014-0086

REBUTTAL TESTIMONY

OF

JOE GASSNER

 \mathbf{ON}

BEHALF OF

MISSOURI DEPARTMENT OF ECONOMIC DEVELOPMENT DIVISION OF ENERGY

Jefferson City, Missouri July 11, 2014

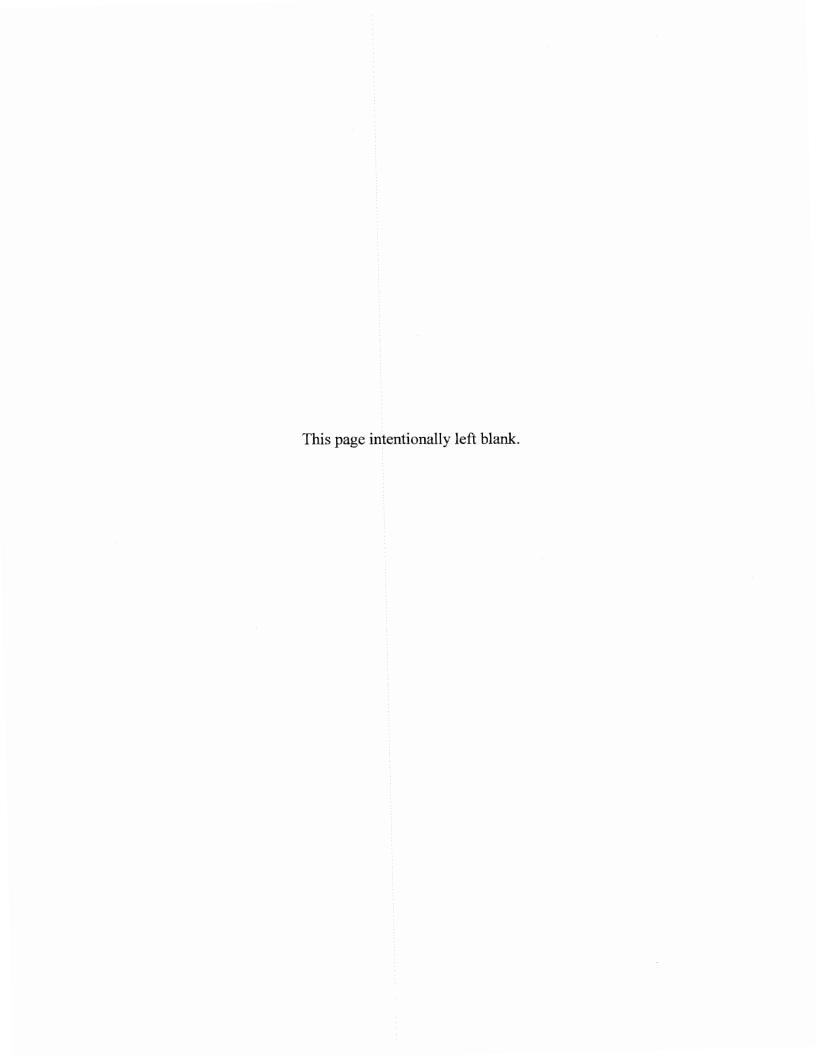


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I. INTRODUCTION

- 1 Q. Please state your name and business address. A. Joe Gassner, Missouri Department of Economic Development, Division of Energy, 301 West 2 High Street, Suite 720, Jefferson City, Missouri. 3 4 O. Have you previously filed testimony in this case? 5 A. No. 6 Q. On whose behalf are you testifying? 7 A. I am testifying on behalf of the Division of Energy (DE), an intervenor in these proceedings. 8 Q. What is your position with the Missouri Division of Energy? 9 A. I am the director of the Weatherization Program in the Division of Energy, which is 10 responsible for administering the Missouri Low Income Weatherization Assistance Program. Q. Please describe your educational background and business experience. 11 12 I earned a Bachelor of Science degree in Wildlife Conservation and Management from 13 Southwest Missouri State University in 1986. I have been in my current position with the Division of Energy since 2006. Other employment history includes working with the 14 15 Missouri Department of Natural Resources from 1991 to 2013 as a District Coordinator (two 16 years) and Environmental Specialist (14 years), working with the Osage County Soil and Water Conservation District from 1990-1991 as a District Technician, and working with the 17 18 Missouri Department of Conservation from 1986 to 1989 as a Fisheries and Wildlife 19 Management Technician
 - II. PURPOSE AND SUMMARY OF REBUTTAL TESTIMONY
- Q. What is the purpose of your rebuttal testimony in these proceedings?

20

22	A. The purpose of my rebuttal testimony is to respond to the direct testimony filed by the
23	Missouri Public Service Commission Staff (Staff) witness Kory Boustead regarding a low
24	income weatherization program for Summit Natural Gas of Missouri, Inc. (SNG).
25	III. LOW INCOME WEATHERIZATION ASSISTANCE
26	Q. What is Staff's position regarding a SNG low-income weatherization program?
27	A. Staff witness Kory Boustead states that:
28 29 30 31 32 33 34 35 36 37	"Staff recommends the Commission authorize a natural gas energy efficiency program and a low income customer weatherization program that will be ratepayer funded through a regulatory asset account The funds for the low income customer weatherization program would be administered by the Department of Economic Development, Division of Energy (DE) in conjunction with the federal and state funds they administer for the weatherization of homes of low income Missouri families. The DE low income weatherization has demonstrated an ability to effectively weatherize homes of low income families in Missouri and the Commission has been authorizing ratepayer funded low income customer weatherization for twenty years."
39	Q. Does DE agree with the Staff's position regarding administering an SNG low-income
40	weatherization program?
41	A. DE agrees with Staff that the Commission should authorize a low-income weatherization
42	program and ratepayer funding. DE witness John Buchanan will address the method of rate
43	recovery recommended by DE. We also agree that DE could effectively administer the
44	weatherization program. DE is willing to take on these additional duties with a provision for
45	DE to recover its administrative and monitoring expenses incurred in performing these
46	duties.
47	Q. What level of funding is needed to compensate DE for administration and monitoring of
48	an SNG LIWAP program?

 $^{^{1}}$ I Missouri Public Service Commission, Staff Report, Revenue Requirement Cost of Service, page 74, lines 11-25, May 30, 2014.

19	A. The costs DE incurs should be covered by allowing up to 5 percent of the weatherization
50	fund for DE administration and monitoring. This level of funding for administration and
51	monitoring is within U.S. Department of Energy Low Income Weatherization Assistance
52	Program guidelines found in 10 CFR 440.18(e)
53	Q. What authorization does DE have to receive and/or expend these funds?
54	A. DE is advised by legal counsel that Section 640.676, RSMo, authorizes DE to receive/and or
55	expend these funds.
56	Section 640.676. states:
57 58 59 60 61	1. The department director may secure other forms of financial assistance permissible by law and establish public and private partnerships with, but not limited to, financial institutions, performance contracting vendors, energy utilities and other energy providers, when such other financial assistance serves to further the implementation of energy conservation projects.
62 63 64 65 66	2. The director is authorized to negotiate agreements for the department to act in an administrative or monitoring capacity for an energy conservation project funded in part or in full by another source. The department may establish reasonable fees such as, but not limited to, application and processing fees to cover the costs of such administrative or monitoring role.
6 7	I am further advised by counsel that, pursuant to sections 26.500-26.540 RSMo, the
68	Governor issued Executive Order 13-03. This Order, effective August 29, 2013,
69	transferred "all authority, powers, duties, functions, records, personnel, property, contracts,
70	budgets, matters pending, and other pertinent vestiges of the Division of Energy from the
71	Missouri Department of Natural Resources to the Missouri Department of Economic
72	Development" So, with its move to the Department of Economic Development, DE
73	retains all the authority it had under the Department of Natural Resources, including the
74	ability to administer weatherization funding.

Q. Please describe DE's weatherization administrative and monitoring functions.

75

76	A. For low income weatherization assistance funds that DE currently administers on behalf of
77	Ameren (natural gas and electric), Liberty and Laclede, the utilities make a single annual
78	payment to the Missouri Environmental Improvement and Energy Resources Authority
79	(EIERA). Then DE enters into subgrant agreements with community action agencies and
80	other subgrantees, as applicable, within the utility's service area, based on budgets provided
81	by the agencies. Technical and fiscal training for the subgrantees' staff is provided as needed
82	Once weatherization work is completed on a home, DE conducts a desk audit of the
83	reimbursement request from the subgrantee and processes it for payment. In addition, a
84	sampling of homes is monitored by on-site inspection to verify that weatherization measures
85	have been installed and are operating properly. Fiscal monitoring is performed through both
86	desk reviews and on-site review of client files, invoices, procedures manuals and other
8 7	documentation.

- Q. Does DE receive General Revenue (GR) funds that could be used to cover the
 administrative and monitoring costs that will be incurred in administering and
 monitoring a weatherization program for SNG?
- A. No. DE receives no GR funds that are available to use for weatherization or any other DE
 program.
- Q. Are you aware of any other sources of DE funding that could be used to cover administrative and monitoring costs for an SNG weatherization program?
- A. No. All DE program funds are tied to their individual program funding. DOE weatherization funds are the only currently available funds that the DE weatherization program has available to utilize for administrative costs and monitoring. These funds are currently being fully utilized and have been shrinking for the past several years.

100	Q. Do you have a specific recommendation for the level of funding for an SNG low income
101	weatherization program?
102	A. The DE recommends an initial annual funding level of \$30,000 to support a low income
103	weatherization assistance program. As Missouri's LIWAP Director, it is my opinion that to
104	effectively implement the SNG low income weatherization program would require an
105	investment of \$30,000; a lower level of funding could possibly compromise the viability of

- the SNG weatherization program.
- 107 Q. Does this conclude your rebuttal testimony?
- 108 A. Yes. Thank you.

BEFORE THE PUBLIC SERVICE COMMISSION OF THE STATE OF MISSOURI

In the Matter of Summit Natura Filing of Revised Tariffs to Inc Revenues for Natural Gas Serv	rease its Annu	,	Case No. GR-2014-0086			
AFFIDAVIT OF JOE GASSNER						
STATE OF MISSOURI) CITY OF JEFFERSON)	ss					
I, Joe Gassner, of lawful age, b	eing duly swo	orn on his oath,	deposes and states:			
1. My name is Joe Gassner. I	work in the C	City of Jefferson	, Missouri, and I am employed by			
the Missouri Department o	f Economic De	evelopment as V	Weatherization Director, Division of			
Energy.						
2. Attached hereto and made	a part hereof for	or all purposes	is my Rebuttal Testimony on behalf			
of the Missouri Departmen	t of Economic	Development/	Division of Energy.			
3. I hereby swear and affirm	3. I hereby swear and affirm that my answers contained in the attached testimony to the					
questions therein propound	led are true and	d correct to the	best of my knowledge.			
		Do	Joe Gassner			
Subscribed and sworn to before	e me on this 1	1th day of July,	2014.			
My commission expires:	KAY A. JOHA Notary Public - STATE OF M Cole Co by Commission Expir Commission #	Notary Seal MISSOURI Dunty	Notary Public NOTARY PUBLIC PUBLIC SEAL OF MISSONIII			