

*Exhibit No.:*  
*Issue(s):* *Low Income Energy Assistance Program*  
*Witness:* *Dana R. Parish*  
*Sponsoring Party:* *MoPSC Staff*  
*Type of Exhibit:* *Rebuttal Testimony*  
*Case No.:* *GR-2018-0013*  
*Date Testimony Prepared:* *April 13, 2018*

**MISSOURI PUBLIC SERVICE COMMISSION**

**COMMISSION STAFF DIVISION**

**CONSUMER EXPERIENCE DEPARTMENT**

**REBUTTAL TESTIMONY**

**OF**

**DANA R. PARISH**

**LIBERTY UTILITIES (MIDSTATES NATURAL GAS) CORP.  
d/b/a LIBERTY UTILITIES**

**CASE NO. GR-2018-0013**

*Jefferson City, Missouri*  
*April 2018*

1 **REBUTTAL TESTIMONY**

2 **OF**

3 **DANA R. PARISH**

4 **LIBERTY UTILITIES (MIDSTATES NATURAL GAS) CORP.**

5 **d/b/a LIBERTY UTILITIES**

6 **CASE NO. GR-2018-0013**

7 Q. Please state your name and business address.

8 A. My name is Dana R. Parish, and my business address is 200 Madison Street,  
9 P.O. Box 360, Jefferson City, Missouri 65102.

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

11 A. I am employed by the Missouri Public Service Commission as a Utility Policy  
12 Analyst I in the Customer Experience Department of the Commission Staff Division.

13 Q. Please state your educational background and experience.

14 A. These are contained in Schedule DRP-r1.

15 Q. What is the purpose of your rebuttal testimony?

16 A. The purpose of my testimony is to respond to the Direct Testimony of  
17 Missouri Department of Economic Development Division of Energy (“DE”) witness  
18 Martin R. Hyman’s testimony filed in GR-2018-0013; specifically, regarding the creation of a  
19 low-income energy assistance program.

20 Q. Are other Staff witnesses addressing other aspects of Mr. Hyman’s testimony?

21 A. Yes. Staff witness Brad Fortson, with the Energy Resources Department, will  
22 address the Red-Tag Repair Program. Staff witness Michael Stahlman, with the Tariff and  
23 Rate and Design Unit, will address the rate design aspect of the proposed bill credit in  
24 Mr. Hyman’s testimony.

1 Q. Does Liberty Midstates - MO currently have a low-income energy assistance  
2 program for residential natural gas customers?

3 A. No.

4 Q. Based on Staff's knowledge, does Staff agree that natural gas affordability is a  
5 concern for some Missouri customers?

6 A. Yes. Staff agrees that natural gas affordability is a concern for some Missouri  
7 customers; particularly low-income customers.

8 Statistical data published in April 2018 by Fisher, Sheehan & Colton, "The Home  
9 Energy Affordability Gap 2017,"<sup>1</sup> finds that Missouri households with an income below 50%  
10 of the Federal Poverty Level (FPL) face an energy burden<sup>2</sup> of 28%. In 2017, this amounted to  
11 161,606 Missouri households. This burden does not only affect the very poor; roughly  
12 204,000 additional Missouri households live with incomes between 50% and 100% of the  
13 FPL and face a home energy burden of 15%. Households with an income 150% to 185% of  
14 the FPL face an energy burden of 7%; while 185% to 200% of the FPL face an energy burden  
15 of 6%. The energy burden appears to remain steady; the total number of Missouri households  
16 below 200% of the FPL was 835,364 in 2016 and 824,505 in 2017.

17 Q. Have other investor-owned energy utilities in Missouri addressed the needs of  
18 low-income customers with special programs or incentives?

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<sup>1</sup> Fisher, Sheehan & Colton. Public Finance and General Economics. (April 2018). "The Home Energy Affordability Gap 2017: Missouri, 2<sup>nd</sup> Series" Fact Sheet. Retrieved April 6, 2018 from [http://www.homeenergyaffordabilitygap.com/03a\\_affordabilityData.html](http://www.homeenergyaffordabilitygap.com/03a_affordabilityData.html)

<sup>2</sup> Energy Burden, as defined by the American Council for an Energy-Efficient Economy (April 2016), is "the percentage of household income spent on home energy bills." Retrieved April 9, 2018 from <http://aceee.org/research-report/u1602>

1           A.     Yes. Some of those companies include KCP&L Greater Missouri  
2 Operations Company,<sup>3</sup> Kansas City Power and Light Company,<sup>4</sup> Union Electric Company  
3 d/b/a Ameren Missouri,<sup>5</sup> and Spire Missouri Inc. d/b/a Spire (“Spire Missouri”).<sup>6</sup>

4           The most recent of these programs has been initiated by Spire Missouri. In Case Nos.  
5 GR-2017-0215 and GR-2017-0216, the Commission ordered annual funding for  
6 Spire Missouri’s Low-Income Energy Affordability Program in its eastern territory at  
7 \$900,000 and \$750,000 in Spire Missouri’s western territory. Eligible customers will receive  
8 a monthly bill credit of \$20 year-round. In the billing months of November through April,  
9 eligible customers with household incomes ranging from 0% to 135% of the FPL will receive  
10 an additional \$30 credit (the total bill credit not to exceed the customer’s monthly bill  
11 amount).

12           Q.     What is Mr. Hyman recommending in his testimony?

13           A.     Mr. Hyman’s testimony, on page 5, lines 12 through 16, and on page 6, states:

14                   *I would recommend that a similar Low-Income Energy*  
15                   *Affordability Program as that described above for Spire service*  
16                   *areas be implemented by Liberty. DE is open to considering*  
17                   *alternative higher bill credits for the Company’s northeastern*  
18                   *region because of the potential greater need due to*  
19                   *climatological conditions. Given the differences in size between*  
20                   *Liberty and Spire, DE recommends an initial funding amount of*  
21                   *\$72,600 per year.*  
22

23           Mr. Hyman’s direct testimony page 6, lines 1 through 5 goes on to state:

24                   *This amount is approximately proportional to the total funding*  
25                   *of Spire’s Low-income Energy Affordability Program and the*

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<sup>3</sup> Missouri Public Service Commission Tariff No. JE-2017-0232, KCP&L Greater Missouri Operations Company, June 2, 2017, Sheet Nos. R-62.15-R-62.18

<sup>4</sup> Missouri Public Service Commission Tariff No. YE-2017-0235, Kansas City Power & Light Company, June 8, 2017, Sheet Nos. 43Z-43Z.3

<sup>5</sup> Missouri Public Service Commission Tariff No. YE-2017-0173, Union Electric Company d/b/a Ameren Missouri, April 1, 2017, Sheet Nos. 160-160.3

<sup>6</sup> Missouri Public Service Commission Tariff No. YG-2018-0117, Spire Missouri Inc. d/b/a Spire, April 19, 2018, Sheet Nos. R-31-31.3

1                    *number of residential customers served by Spire and Liberty.*  
2                    *Spending under the program should be deferred for potential*  
3                    *future recovery, and unused budget amounts should be rolled*  
4                    *forward to future years or relocated to low-income*  
5                    *weatherization, as determined by a stakeholder collaborative.*  
6

7                    Q.     What is Staff's recommendation regarding Mr. Hyman's proposal?

8                    A.     Staff recommends that Liberty Midstates - MO tailor a low-income energy  
9 assistance program to address the needs of its customers. In addition, a stakeholder  
10 collaborative is recommended to develop the program details and evaluate its success. Staff is  
11 willing to participate in such a group. Based on Liberty Midstates – MO's most recent annual  
12 report of 46,451 residential customers, Staff agrees with Mr. Hyman's proposed initial  
13 funding amount of \$72,600 per year. This is in contrast to a larger customer base for Spire  
14 Missouri which was recently approved for \$900,000 per year in its eastern territory and  
15 \$750,000 in its western territory. Staff agrees that any unused fund amount should be rolled  
16 over to the next year or relocated as determined by the stakeholder collaborative.

17                    Q.     Does this conclude your rebuttal testimony?

18                    A.     Yes.

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

In the Matter of Liberty Utilities    )  
(Midstates Natural Gas) Corp. d/b/a    )  
Liberty Utilities' Tariff Revisions    )  
Designed to Implement a General Rate    )  
Increase for Natural Gas Service in the    )  
Missouri Service Areas of the Company    )

Case No. GR-2018-0013

**AFFIDAVIT OF DANA R. PARISH**

STATE OF MISSOURI            )  
  )  
COUNTY OF COLE            )            ss.

COMES NOW DANA R. PARISH and on her oath declares that she is of sound mind and lawful age; that she contributed to the foregoing Rebuttal Testimony and that the same is true and correct according to her best knowledge and belief.


Further the Affiant sayeth not.

  
\_\_\_\_\_  
DANA R. PARISH

**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 11<sup>th</sup> day of April 2018.

D. SUZIE MANKIN  
Notary Public - Notary Seal  
State of Missouri  
Commissioned for Cole County  
My Commission Expires: December 12, 2020  
Commission Number: 12412070

  
\_\_\_\_\_  
Notary Public

## **Dana R. Parish**

### **Educational Background and Work Experience:**

I am a Utility Policy Analyst I, in the Customer Experience Department, Commission Staff Division of the Missouri Public Service Commission. I have been employed by the Missouri Public Service Commission since January 2000.

I have a Bachelor of Arts degree in Business Management. While at the Commission I have worked in the Utility Services Department, Telecommunications Department, and the Customer Experience Department; as well as for Commissioner Sheila Lumpe and Chairman Robert M. Clayton III. Prior to joining the Commission, I was employed as a Business Tax Specialist with the Missouri Department of Revenue.

### **Case Summary:**

*Presented analysis on the following cases and proceedings:*

- TO-2013-0416 and TO-2015-0032, Reduction of the Relay Missouri Surcharge
- CC Docket Nos. 96-45/WC Docket No. 10-90, Annual Certification of Support for Eligible Telecommunications Carriers Pursuant to 47 C.F.R. 54.314, 2009-2012
- TW-2012-0012 and TO-2012-0364, Staff's Investigation into the Practices and Procedures of Companies Offering Low Income (Lifeline) or Disabled Universal Service Fund Discounts in the State of Missouri
- CO-2010-0054, Staff Recommendation Regarding DPI Teleconnect's Application for ETC Status on a Wireless Basis
- CO-2012-0043, Staff Recommendation Regarding Budget PrePay, Inc.'s Application for ETC Status on a Wireless Basis
- CO-2012-0282, Staff Recommendation Regarding Fidelity 1 Inc.'s Application to Amend and Expand Designation as an Eligible Telecommunications Carrier
- LA-2013-0482, Staff Recommendation for Approval of Certificate and/or Initial Tariff
- RA-2011-0298, Staff Recommendation Regarding Assurance Home Phone Service, Inc. d/b/a Surety Wireless' Application for ETC Status on a Wireless Basis
- RA-2011-0299, Staff Recommendation Regarding Global Connection, Inc. of America's Application for ETC Status on a Wireless Basis

- RA-2011-0349, Staff Recommendation Regarding Aegis Telecom, Inc.'s Application for ETC Status on a Wireless Basis
- RA-2011-0376, Staff Recommendation Regarding YourTel America Inc.'s Application to Expand Wireless Lifeline Service
- RA-2011-0384, Staff Recommendation Regarding Assist Wireless, LLC's Application for ETC Status on a Wireless Basis
- RA-2012-0076, Staff Recommendation Regarding Cintex Wireless, LLC's Application for ETC Status on a Wireless Basis
- RA-2012-0264, Staff Recommendation Regarding Assurance Wireless brought to you by Virgin Mobile's Application for ETC Status on a Wireless Basis
- RA-2013-0115, Staff Recommendation to Grant ETC Status to Boomerang Wireless, LLC d/b/a enTouch Wireless
- RA-2014-0225, Staff Recommendation to Grant ETC Status to American Broadband and Telecommunications Company d/b/a American Assistance
- WM-2018-0116 and SM-2018-0117, Staff Recommends Approval of Transfer of Assets, Transfer of Certificates of Convenience and Necessity, and Issuance of Certificate of Convenience and Necessity, Confluence Rivers Utility Operating Company, Inc.
- TA-2010-0146, Staff Recommendation Regarding Budget PrePay Inc.'s Application for ETC Status
- TA-2010-0229, Staff Recommendation Regarding Cricket Communications, Inc. Application for ETC Status
- TA-2011-0164, Staff Recommendation Regarding Easy Telephone Service Company d/b/a Easy Wireless' Application for ETC Status on a Wireless Basis
- TA-2011-0377, Staff Recommendation Regarding i-wireless, LLC's Application for ETC Status on a Wireless Basis
- TA-2012-0128, Staff Recommendation Regarding Chariton Valley Telecom Corporation's Application for ETC Status
- TA-2013-0272, Staff Recommendation Regarding Blue Jay Wireless, LLC's Application for ETC Status on a Wireless Basis
- TA-2014-0236, Staff Recommendation for Approval of Certificate and/or Initial Tariff of Flowroute LLC
- TA-2014-0345, Staff Recommendation for Approval of Certificate and/or Initial Tariff of BCN Telecom, Inc.
- TO-2011-0073, Statutory Requirement to Determine Statewide Average Rate



- TO-2015-0032, Reduction of Relay Missouri Surcharge
- TO-2017-0168, Reduction of Relay Missouri Surcharge
- XO-2011-0062, Staff Recommendation Regarding Telrite Corporation's Application for ETC Status on a Wireless Basis