

Exhibit No.:
Issue(s): *Tariff Issues*
Witness: *Kory J. Boustead*
Sponsoring Party: *MoPSC Staff*
Type of Exhibit: *Surrebuttal Testimony*
Case No.: *GR-2019-0077*
Date Testimony Prepared: *July 10, 2019*

MISSOURI PUBLIC SERVICE COMMISSION

COMMISSION STAFF DIVISION

ENERGY RESOURCES

SURREBUTTAL TESTIMONY

OF

KORY J. BOUSTEAD

**UNION ELECTRIC COMPANY,
d/b/a AMEREN MISSOURI**

CASE NO. GR-2019-0077

*Jefferson City, Missouri
July 2019*

1 Weatherization Assistance Program at the same funding levels and structure and planned to
2 address the Company's filed proposed program changes in Rebuttal testimony.

3 Q. Has a Staff recommendation been filed in response to Mrs. Welikson's
4 recommended changes to the existing programs and the new proposed low-income programs?

5 A. Yes, please see my Rebuttal testimony filed in this case which addresses Staff's
6 concerns and makes recommendations for the Energy Efficiency Program and for the changes
7 proposed by the Company.¹

8 Q. Did Mrs. Welikson respond to National Housing Trust's witness Ms. Brink's
9 recommendation that the low-income multi-family program budget should be a higher
10 percentage of the Company's Gross Operating Revenues?

11 A. Yes. Mrs. Welikson disagreed with Ms. Brink's recommendation and believes
12 Ameren Missouri's proposed budget is appropriate at this time.

13 Q. Do you agree with Mrs. Welikson?

14 A. Staff agrees there should not be a higher percentage allocated to the low-income
15 multi-family proposed program budget as proposed in Ms. Brink's Rebuttal testimony because
16 the overall budget was not spent in full over the past nine years and resulted in a surplus. The
17 surplus is held in a regulatory asset account as a regulatory liability. Some potential barriers
18 exist in ramping up low-income programs for natural gas. The amount of natural gas efficiency
19 measures is limited without much potential for more to be added. The Ameren Gas territory is
20 primarily in rural areas where the number of existing multi-family dwellings can be limited and
21 the majority of potential customers to be served do not meet the criteria to participate in this

¹ 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*, Rebuttal testimony of Kory J. Boustead.

1 program. Allocation of the maximum amount of funds proposed by Ms. Brink would result
2 in 70% of the total budget being allocated to low income customers through the proposed single
3 and multi-family programs and the existing Low-income Weatherization Assistance Program.
4 Due to the history of how the programs have performed in previous years, the probability of the
5 funds being fully utilized is low and has potential create a surplus especially if implemented as
6 proposed by Ms. Brink. Landlord's often lack the capital and incentives to invest in upgrades
7 for their properties. This becomes a detriment to ratepayers when programs funds are unspent
8 and accrue interest in the Company's regulatory asset account because the programs are funded
9 through rates and there is not currently a cap on the amount that can be booked to the regulatory
10 asset account. However, Staff also does not support the Company's proposed budget and
11 proposed source of funding for start-up of the proposed low-income programs. Staff supports
12 the proposed new low-income programs and has recommended an alternate funding structure
13 to the one proposed by the Company. This is further discussed in my Rebuttal testimony.

14 Q. Do you agree with the Division of Energy's support for the Company's proposal
15 to allow transportation customer to participate in energy efficiency programs and creating a
16 customer measure within the business program?

17 A. No, Staff does not agree for the reasons stated in my Rebuttal testimony.²

18 Q. Does this complete your surrebuttal testimony?

19 A. Yes.

² 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*, Rebuttal testimony of Kory J. Boustead, page 7, lines 7-16.

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) Case No. GR-2019-0077

AFFIDAVIT OF KORY J. BOUSTEAD

STATE OF MISSOURI)
) ss.
COUNTY OF COLE)

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 *Surrebuttal Testimony*; and that the same is true and correct according to her best knowledge and belief.

Further the Affiant sayeth not.

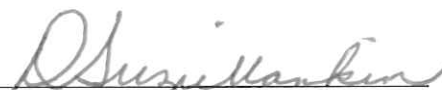


KORY J. BOUSTEAD

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 8th day of July 2019.

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