

**Exhibit No.:** \_\_\_\_\_  
**Issue(s):** Keeping Current Overview/  
Low Income Weatherization  
**Witness/Type of Exhibit:** Marke/Direct  
**Sponsoring Party:** Public Counsel  
**Case No.:** ER-2019-0335

**DIRECT TESTIMONY**  
**OF**  
**GEOFF MARKE**

Submitted on Behalf of the Office of the Public Counsel

**UNION ELECTRIC COMPANY**  
**D/B/A AMEREN MISSOURI**

FILE NO. ER-2019-0335

December 4, 2019



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**DIRECT TESTIMONY**  
**OF**  
**GEOFF MARKE**  
**UNION ELECTRIC COMPANY**  
**d/b/a Ameren Missouri**  
**CASE NO. ER-2019-0335**

1 **I. INTRODUCTION**

2 **Q. Please state your name, title and business address.**

3 A. Geoff Marke, PhD, Chief Economist, Office of the Public Counsel (“OPC” or “Public  
4 Counsel”), P.O. Box 2230, Jefferson City, Missouri 65102.

5 **Q. What are your qualifications and experience?**

6 A. I have been in my present position with OPC since 2014 where I am responsible for economic  
7 analysis and policy research in electric, gas, and water utility operations.

8 **Q. Have you testified previously before the Missouri Public Service Commission?**

9 A. Yes. A listing of the Commission cases in which I have previously filed testimony and/or  
10 comments is attached in Schedule GM-1.

11 **Q. What is the purpose of your direct testimony?**

12 A. The purpose of this testimony is to provide the Commission an overview and subsequent  
13 recommendations for Ameren Missouri’s bill payment assistance program “Keeping Current,”  
14 and Ameren Missouri’s Low-Income Weatherization Assistance (“LIWAP”) funding.

15 **Q. Would you summarize your recommendations on the Keeping Current program moving  
16 forward?**

17 A. I have two primary recommendations: 1.) that a 20% budget variance (\$141,200) extension be  
18 created and applied from the ratepayer-funded portion of the current budget.<sup>1</sup> Alternatively, I  
19 recommend that any remaining yearly balance be allocated evenly to the remaining

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<sup>1</sup> The current \$1,331,000 annual Keeping Current budget is funded at 53% (\$706,000) by ratepayers and 47% (\$625,000) by Ameren shareholders.

1 participants' last monthly bill; and 2.) Ameren Missouri be required to contract with a third-  
2 party consultant/researcher to provide a report to the Keeping Current collaborative by October  
3 31, 2020, and subsequently file in Ameren Missouri's next rate case that includes (at a  
4 minimum) the following items:

- 5 • A literature review of bill assistance best practices across utilities;
- 6 • A proposal that includes increasing the annual budget and removing the pilot status;
- 7 • An alternative proposal that focuses on specific targeted bill assistance (e.g., former  
8 homeless population, electric space-heating, renters, etc.); and
- 9 • A recommendation on how to leverage existing funding mechanisms to maximize  
10 program impact moving forward.

## 11 **II. KEEPING CURRENT OVERVIEW**

### 12 **Q. What is Ameren Missouri's Keeping Current program?**

13 A. Keeping Current is an energy assistance program with two parts: 1.) the year-round Keeping  
14 Current component; and 2.) the summer-only Keeping Cool component. The former provides  
15 monthly bill credits and arrearage reduction for customers who continue to make monthly bill  
16 payments. The latter provides bill credits in the summer months (primarily June, July and  
17 August) to offset the costs of air condition usage.

18 Ameren Missouri introduced their Keeping Current energy assistance pilot program in October  
19 2010. The program was developed in collaboration with AARP, Consumers Council of  
20 Missouri ("CCM"), Missouri Office of the Public Counsel ("OPC"), Missouri Public Service  
21 Commission Staff ("Staff"), Missouri Industrial Energy Consumers ("MIEC") and the  
22 Missouri Retailers Association ("MRA"). The program funding was reauthorized and the  
23 program has continued with some refinements to the design based on periodic evaluation  
24 findings. Presently the annual budget for the program is \$1,331,000 with \$706,000 provided  
25 by ratepayers (specifically, 1, 2, 3, 4, 11 and 12 (M) classes) and \$625,000 provided by  
26 shareholders.

1 **Q. Describe the targeted demographics of the program?**

2 A. Based on participant data from 2018 and compiled by the third-party (Apprise) evaluation,  
3 Keeping Current participants included:

- 4 • 35% were below 50% of the federal poverty line (\$12,550 or below, family of four);
- 5 • 45% were between 51% and 100% of the federal poverty line (\$12,550 to \$25,100  
6 family of four);
- 7 • 20% were above 100% of the federal poverty line (\$25,101 or more, family of four);
- 8 • 65% had at least one vulnerable member (elderly, disabled and/or young child) in the  
9 household; and
- 10 • About 70% were unemployed either throughout or at some point during the year.

11 Additionally, based on 2018 data from the same study, Keeping Cool participants included:

- 12 • 70% were between 50% and 100% (\$12,550 to \$25,100 family of four) of the federal  
13 poverty line;
- 14 • 82% had an elderly household member; and
- 15 • 64% were unemployed and 34% were retired.

16 **Q. Has the program been successful?**

17 A. Yes. I consider the Ameren Missouri Keeping Current Low-Income Pilot program the best bill  
18 and arrearage assistance program currently in place amongst all of our investor-owned utilities.  
19 Each subsequent third-party evaluation of the program has come back better than the last and  
20 Ameren Missouri's in-house personnel deserves a lot of credit for being receptive to  
21 stakeholders concerns, suggestions and spearheaded many practical solutions for its customers.

22 **Q. What is the basis for that conclusion?**

23 A. In judging the success of a bill assistance program it is important that expectations of "success"  
24 are appropriately calibrated. Keeping in mind the aforementioned demographic information  
25 stated above, Keeping Current targets customers who have a high probability of losing service.  
26 Keeping Current bill credits and arrearage reductions allowed the median average energy

1           burden to decrease from 30% to 20% for electric heating participants and a decrease from 24%  
2           to 20% for non-electric heating customers.<sup>2</sup>

3           Additionally, Keeping Current has continued to produce more favorable outcomes in each  
4           successive third-party evaluation. For example, in the most recent evaluation it was determined  
5           that 59% of the Keeping Current maintained and received benefits over the twelve-month  
6           evaluation period, that is, a little more than half of the participants did not drop out of the  
7           program due to non-payment (or other reasons).<sup>3</sup> This is a considerable increase from the 2016  
8           study (46%) and the 2013 study (29%).

9           **Q.    Have other utilities adopted a similar Keeping Current energy assistance program in  
10           their tariff?**

11          A.    Spire adopted a similar bill payment program in its last rate case.

12          **Q.    Did Spire experience similar results as Ameren Missouri?**

13          A.    In part. In Spire's East's (formerly Laclede Natural Gas) first year of its program the utility had  
14           to suspend applications out of fear of over enrollment and concern that the annual budget would  
15           be exceeded. However, this preemptive action resulted in only 78% of its annual budget  
16           actually being spent. In that case, almost \$200,000 in bill assistance was left unutilized. Spire  
17           West was more successful with only \$35,500 in bill assistance left unutilized in its first year.

18          **Q.    What recommendations do you have for the Commission regarding Keeping Current?**

19          A.    For the budget, I first recommend that shareholder dollars be fully expended first before  
20           ratepayer dollars are allocated. Second, I recommend that a 20% variance to the ratepayer-  
21           funded portion of the annual budget be included to prevent a Spire East scenario happening in  
22           the future. This recommendation allows for up to an additional \$141,200 in the annual budget.  
23           Such a buffer could allow Ameren Missouri to attract more participants but have the confidence  
24           that the budget will still be met without Commission approval. At a minimum, a budget  
25           variance should ensure that the full amount would get spent down every year. Alternatively, I

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<sup>2</sup> Energy Burden is the percent of income that is spent on energy.

<sup>3</sup> For example, the participant moved or became deceased.

1 also support allocating any remaining yearly balance evenly to the remaining participants' last  
2 monthly bill. This too, would ensure that Ameren Missouri would always expend the full  
3 budget as contemplated.

4 **Q. Do you have any other recommendations regarding Keeping Current?**

5 A. Yes. I recommend that historic funds allocated for the evaluation of Keeping Current program  
6 be redirected (for a one-time event) to a program design and expansion report for collaborative  
7 members to review in time for Ameren Missouri's next rate case.

8 **Q. What would such a report include?**

9 A. I envision hiring a third-party consultant to provide a report to the Keeping Current  
10 collaborative by October 31<sup>st</sup> 2020 and to subsequently file the following items in Ameren  
11 Missouri's next rate case:

- 12 • A literature review of bill assistance best practices across utilities;
- 13 • A proposal that includes increasing the annual budget and removing the pilot status;
- 14 • An alternative proposal that focuses on specific targeted bill assistance (e.g., former  
15 homeless population, electric space-heating, renters, etc.); and
- 16 • A recommendation on how to leverage existing funding mechanisms to maximize  
17 program impact moving forward.

18 **Q. What would be the goal in this report?**

19 A. Keeping Current has proven to be a successful program at its small scale. The program is also  
20 now entering the 10<sup>th</sup> year of a seemingly "evergreen" pilot status.

21 In my opinion, it is time to consider next steps in the program—whether that means scaling the  
22 program up or expanding to another targeted demographic. My hope is that a 3<sup>rd</sup> party program  
23 design and expansion report can help facilitate that dialogue amongst relevant stakeholders in  
24 time to produce tangible recommendations to the Commission for Ameren Missouri's next rate  
25 case. The aforementioned four bullet-points provide a reasonable framework to work from and  
26 I welcome feedback in rebuttal testimony from interested parties on the issue.

1 **III. LOW INCOME WEATHERIZATION**

2 **Q. Do you have any recommendations regarding Ameren Missouri's LIWAP funding?**

3 A. Consistent with my position in the Ameren Missouri Gas Case No: GR-2019-0077, I  
4 recommend that Ameren Missouri's tariff be adjusted to grant recipient Community Action  
5 Agencies more flexibility and discretion in how they utilize weatherization assistance funding.  
6 That is, the Agencies should be allowed to deviate from the Department of Energy guidelines.  
7 The relevant stipulation language in the Ameren Gas Case read as follows:

8 Since the administrative functions and the funding for IEWAP are not  
9 federally sourced, the agencies need not adhere to the same strict guidelines  
10 for spending these funds as necessary for spending federally administered  
11 or sourced funds; therefore, Agencies will not have to adhere to the US DOE  
12 guidelines for weatherization. Agencies, at their discretion, can use funds to  
13 weatherize properties that have historically been passed over due to  
14 eligibility related to date-last-weatherized or reasonable health and hazard  
15 conditions. Participating Agencies are required to document use of  
16 discretionary funds and number of properties completed annually with  
17 invitations extended to Agencies to participate once a year (by phone or in  
18 person) in one of the two bi-annual collaborative energy efficiency  
19 meetings. During the collaborative energy efficiency meetings,  
20 stakeholders shall discuss any guidelines that may be necessary for the  
21 Agencies to implement.<sup>4</sup>

22 **Q. Does this conclude your testimony?**

23 A. Yes.

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<sup>4</sup> GR-2019-0077 First Amended Nonunanimous Stipulation and Agreement p. 5.

CASE PARTICPATION OF  
GEOFF MARKE, PH.D.

Company Name	Employed Agency	Case Number	Issues
Union Electric Company d/b/a Ameren Missouri	Office of Public Counsel (OPC)	ER-2019-0335	<b>Direct:</b> Keeping Current Bill Assistance Program
Rule Making	OPC	AW-2020-0148	<b>Memorandum:</b> Residential Customer Disconnections and Data Standardization
Empire District Electric Company /Kansas City Power & Light & KCP&L Greater Missouri Operations Company/Union Electric Company d/b/a Ameren Missouri	OPC	EO-2020-0047 EO-2020-0046 EO-2020-0045 EO-2020-0044	<b>Memorandum:</b> Additive Manufacturing, Cement Block Battery Storage, Virtual Power Plant, Customer-Side Renewable Generation, Historical Review of energy forecasts (KCPL, GMO and Empire-Specific) and Rush Island and Labadie Power Plant Environmental Retrofits (Ameren specific)
KCP&L Greater Missouri Operations Company & Kansas City Power and Light Company	OPC	EO-2019-0132	<b>Rebuttal:</b> Response to KCPL’s MEEIA application, Equitable Energy Efficiency Baseline, WattTime: Automated Emissions Reduction, PAYS, Urban Heat Island Mitigation <b>Surrebuttal:</b> Market Potential Study, Single Family Low-Income
KCP&L Greater Missouri Operations Company	OPC	EC-2019-0200	<b>Surrebuttal:</b> Deferral Accounting and Stranded Assets
Union Electric Company d/b/a Ameren Missouri	OPC	ED-2019-0309	<b>Memorandum:</b> on the “Aluminum Smelter Rate”
KCP&L Greater Missouri Operations Company	OPC	EO-2019-0067	<b>Rebuttal:</b> Renewable Energy Credits
Union Electric Company d/b/a Ameren Missouri	OPC	EO-2019-0314	<b>Memorandum:</b> Notice of Deficiency to Annual IRP Update
Rule Making	OPC	WX-2019-0380	<b>Memorandum:</b> on Affiliate Transaction Rules for Water Corporations
Working Case: Evaluate Potential Mechanisms for Facilitating Installation of Electric Vehicle Charging Stations	OPC	EW-2019-0229	<b>Memorandum:</b> on Policy Surrounding Electric Vehicles and Electric Vehicle Charging Stations
Rule Making	OPC	EX-2019-0050	<b>Memorandum</b> on Solar Rebates and Low Income Customers
Union Electric Company d/b/a Ameren Missouri	OPC	GR-2019-0077	<b>Direct:</b> Billing Practices <b>Rebuttal:</b> Rate Design, Decoupling, Energy Efficiency, Weatherization, CHP
Empire District Electric Company	OPC	EA-2019-0010	<b>Rebuttal:</b> Levelized Cost of Energy, Wind in the Southwest Power Pool

			<b>Surrebuttal:</b> SPP Market Conditions, Property Taxes, Customer Protections
Empire District Electric Company /Kansas City Power & Light & KCP&L Greater Missouri Operations Company/Union Electric Company d/b/a Ameren Missouri	OPC	EO-2019-0066 EO-2019-0065 EO-2019-0064 EO-2019-0063	<b>Memorandum:</b> Additive Manufacturing and Cement Block Battery Storage (IRP: Special Contemporary Topics)
Working Case: Allocation of Solar Rebates from SB 564	OPC	EW-2019-0002	<b>Memorandum</b> on Solar Rebates and Low Income Customers
Rule Making Workshop	OPC	AW-2018-0393	<b>Memorandum:</b> Supplemental Response to Staff Questions pertaining to Rules Governing the Use of Customer Information
Union Electric Company d/b/a Ameren Missouri	OPC	ET-2018-0132	<b>Rebuttal:</b> Line Extension / Charge Ahead – Business Solutions / Charge Ahead – Electric Vehicle Infrastructure <b>Supplemental Rebuttal:</b> EV Adoption Performance Base Metric
Union Electric Company d/b/a Ameren Missouri	OPC	EO-2018-0211	<b>Rebuttal:</b> MEEIA Cycle III Application <b>Surrebuttal:</b> Cost Effectiveness Tests / Equitable Energy Efficiency Baseline
Union Electric Company d/b/a Ameren Missouri	OPC	EA-2018-0202	<b>Rebuttal:</b> Renewable Energy Standard Rate Adjustment Mechanism/Conservation <b>Surrebuttal:</b> Endangered and Protected Species
Kansas City Power & Light & KCP&L Greater Missouri Operations Company	OPC	ER-2018-0145 ER-2018-0146	<b>Direct:</b> Smart Grid Data Privacy Protections <b>Rebuttal:</b> Clean Charge Network / Community Solar / Low Income Community Solar / PAYS/ Weatherization/Economic Relief Pilot Program/Economic Development Rider/Customer Information System and Billing <b>Rebuttal:</b> TOU Rates / IBR Rates / Customer Charge / Restoration Charge <b>Surrebuttal:</b> KCPL-GMO Consolidation / Demand Response / Clean Charge Network / One CIS: Privacy, TOU Rates, Billing & Customer Experience
Union Electric Company d/b/a Ameren Missouri	OPC	ET-2018-0063	<b>Rebuttal:</b> Green Tariff

Liberty Utilities	OPC	GR-2018-0013	<b>Surrebuttal:</b> Decoupling
Empire District Electric Company	OPC	EO-2018-0092	<b>Rebuttal:</b> Overview of proposal/ MO PSC regulatory activity / Federal Regulatory Activity / SPP Activity and Modeling / Ancillary Considerations <b>Surrebuttal</b> Response to parties <b>Affidavit</b> in opposition to the non-unanimous stipulation and agreement
Great Plains Energy Incorporated, Kansas City Power & Light Company, KCP&L Greater Missouri Operations Company, and Westar Energy, Inc.	OPC	EM-2018-0012	<b>Rebuttal:</b> Merger Commitments and Conditions / Outstanding Concerns
Missouri American Water	OPC	WR-2017-0285	<b>Direct:</b> Future Test Year/ Cost Allocation Manual and Affiliate Transaction Rules for Large Water Utilities / Lead Line Replacement <b>Direct:</b> Rate Design / Cost Allocation of Lead Line Replacement <b>Rebuttal:</b> Lead Line Replacement / Future Test Year/ Decoupling / Residential Usage / Public-Private Coordination <b>Rebuttal:</b> Rate Design <b>Surrebuttal:</b> Affiliate Transaction Rules / Decoupling / Inclining Block Rates / Future Test Year / Single Tariff Pricing / Lead Line Replacement
Missouri Gas Energy / Laclede Gas Company	OPC	GR-2017-0216 GR-2017-0215	<b>Rebuttal:</b> Decoupling / Rate Design / Customer Confidentiality / Line Extension in Unserved and Underserved Areas / Economic Development Rider & Special Contracts <b>Surrebuttal:</b> Pay for Performance / Alagasco & EnergySouth Savings / Decoupling / Rate Design / Energy Efficiency / Economic Development Rider: Combined Heat & Power
Indian Hills Utility	OPC	WR-2017-0259	<b>Direct:</b> Rate Design
Rule Making	OPC	EW-2018-0078	<b>Memorandum:</b> Cogeneration and net metering - Disclaimer Language regarding rooftop solar
Empire District Electric Company	OPC	EO-2018-0048	<b>Memorandum:</b> Integrated Resource Planning: Special Contemporary Topics Comments

Kansas City Power & Light	OPC	EO-2018-0046	<b>Memorandum:</b> Integrated Resource Planning: Special Contemporary Topics Comments
KCP&L Greater Missouri Operations Company	OPC	EO-2018-0045	<b>Memorandum:</b> Integrated Resource Planning: Special Contemporary Topics Comments
Missouri American Water	OPC	WU-2017-0296	<b>Direct:</b> Lead line replacement pilot program <b>Rebuttal:</b> Lead line replacement pilot program <b>Surrebuttal:</b> Lead line replacement pilot program
KCP&L Greater Missouri Operations Company	OPC	EO-2017-0230	<b>Memorandum</b> on Integrated Resource Plan, preferred plan update
Working Case: Emerging Issues in Utility Regulation	OPC	EW-2017-0245	<b>Memorandum</b> on Emerging Issues in Utility Regulation / <b>Presentation:</b> Inclining Block Rate Design Considerations <b>Presentation:</b> Missouri Integrated Resource Planning: And the search for the “preferred plan.” <b>Memorandum:</b> Draft Rule 4 CSR 240-22.055 DER Resource Planning
Rule Making	OPC	EX-2016-0334	<b>Memorandum</b> on Missouri Energy Efficiency Investment Act Rule Revisions
Great Plains Energy Incorporated, Kansas City Power & Light Company, KCP&L Greater Missouri Operations Company, and Westar Energy, Inc.	OPC	EE-2017-0113 / EM-2017-0226	<b>Direct:</b> Employment within Missouri / Independent Third Party Management Audits / Corporate Social Responsibility
Union Electric Company d/b/a Ameren Missouri	OPC	ET-2016-0246	<b>Rebuttal:</b> EV Charging Station Policy <b>Surrebuttal:</b> EV Charging Station Policy
Kansas City Power & Light		ER-2016-0156	<b>Direct:</b> Consumer Disclaimer <b>Direct:</b> Response to Commission Directed Questions <b>Rebuttal:</b> Customer Experience / Greenwood Solar Facility / Dues and Donations / Electric Vehicle Charging Stations <b>Rebuttal:</b> Class Cost of Service / Rate Design <b>Surrebuttal:</b> Clean Charge Network / Economic Relief Pilot Program / EEI Dues / EPRI Dues

Union Electric Company d/b/a Ameren Missouri	OPC	ER-2016-0179	<b>Direct:</b> Consumer Disclaimer / Transparent Billing Practices / MEEIA Low-Income Exemption <b>Direct:</b> Rate Design <b>Rebuttal:</b> Low-Income Programs / Advertising / EEI Dues <b>Rebuttal:</b> Grid-Access Charge / Inclining Block Rates /Economic Development Riders
KCP&L Greater Missouri Operations Company	OPC	ER-2016-0156	<b>Direct:</b> Consumer Disclaimer <b>Rebuttal:</b> Regulatory Policy / Customer Experience / Historical & Projected Customer Usage / Rate Design / Low- Income Programs <b>Surrebuttal:</b> Rate Design / MEEIA Annualization / Customer Disclaimer / Greenwood Solar Facility / RESRAM / Low-Income Programs
Empire District Electric Company, Empire District Gas Company, Liberty Utilities (Central) Company, Liberty Sub- Corp.	OPC	EM-2016-0213	<b>Rebuttal:</b> Response to Merger Impact <b>Surrebuttal:</b> Resource Portfolio / Transition Plan
Working Case: Polices to Improve Electric Regulation	OPC	EW-2016-0313	<b>Memorandum</b> on Performance-Based and Formula Rate Design
Working Case: Electric Vehicle Charging Facilities	OPC	EW-2016-0123	<b>Memorandum</b> on Policy Considerations of EV stations in rate base
Empire District Electric Company	OPC	ER-2016-0023	<b>Rebuttal:</b> Rate Design, Demand-Side Management, Low-Income Weatherization <b>Surrebuttal:</b> Demand-Side Management, Low-Income Weatherization, Monthly Bill Average
Missouri American Water	OPC	WR-2015-0301	<b>Direct:</b> Consolidated Tariff Pricing / Rate Design Study <b>Rebuttal:</b> District Consolidation/Rate Design/Residential Usage/Decoupling <b>Rebuttal:</b> Demand-Side Management (DSM)/ Supply-Side Management (SSM) <b>Surrebuttal:</b> District Consolidation/Decoupling Mechanism/Residential Usage/SSM/DSM/Special Contracts

Working Case: Decoupling Mechanism	OPC	AW-2015-0282	<b>Memorandum:</b> Response to Comments
Rule Making	OPC	EW-2015-0105	Missouri Energy Efficiency Investment Act Rule Revisions, Comments
Union Electric Company d/b/a Ameren Missouri	OPC	EO-2015-0084	Triennial Integrated Resource Planning Comments
Union Electric Company d/b/a Ameren Missouri	OPC	EO-2015-0055	<b>Rebuttal:</b> Demand-Side Investment Mechanism / MEEIA Cycle II Application <b>Surrebuttal:</b> Potential Study / Overearnings / Program Design <b>Supplemental Direct:</b> Third-party mediator (Delphi Panel) / Performance Incentive <b>Supplemental Rebuttal:</b> Select Differences between Stipulations <b>Rebuttal:</b> Pre-Pay Billing
The Empire District Electric Company	OPC	EO-2015-0042	Integrated Resource Planning: Special Contemporary Topics Comments
KCP&L Greater Missouri Operations Company	OPC	EO-2015-0041	Integrated Resource Planning: Special Contemporary Topics Comments
Kansas City Power & Light	OPC	EO-2015-0040	Integrated Resource Planning: Special Contemporary Topics Comments
Union Electric Company d/b/a Ameren Missouri	OPC	EO-2015-0039	Integrated Resource Planning: Special Contemporary Topics Comments
Union Electric Company d/b/a Ameren Missouri	OPC	EO-2015-0029	Ameren MEEIA Cycle I Prudence Review Comments
Kansas City Power & Light	OPC	ER-2014-0370	<b>Direct</b> (Revenue Requirement): Solar Rebates <b>Rebuttal:</b> Rate Design / Low-Income Weatherization / Solar Rebates <b>Surrebuttal:</b> Economic Considerations / Rate Design / Cyber Security Tracker
Rule Making	OPC	EX-2014-0352	<b>Memorandum</b> Net Metering and Renewable Energy Standard Rule Revisions,
The Empire District Electric Company	OPC	ER-2014-0351	<b>Rebuttal:</b> Rate Design/Energy Efficiency and Low-Income Considerations
Rule Making	OPC	AW-2014-0329	Utility Pay Stations and Loan Companies, Rule Drafting, Comments
Union Electric Company d/b/a Ameren Missouri	OPC	ER-2014-0258	<b>Direct:</b> Rate Design/Cost of Service Study/Economic Development Rider <b>Rebuttal:</b> Rate Design/ Cost of Service/ Low Income Considerations <b>Surrebuttal:</b> Rate Design/ Cost-of-Service/ Economic Development Rider
KCP&L Greater Missouri Operations Company	OPC	EO-2014-0189	<b>Rebuttal:</b> Sufficiency of Filing <b>Surrebuttal:</b> Sufficiency of Filing

KCP&L Greater Missouri Operations Company	OPC	EO-2014-0151	Renewable Energy Standard Rate Adjustment Mechanism (RESRAM) Comments
Liberty Natural Gas	OPC	GR-2014-0152	<b>Surrebuttal:</b> Energy Efficiency
Summit Natural Gas	OPC	GR-2014-0086	<b>Rebuttal:</b> Energy Efficiency <b>Surrebuttal:</b> Energy Efficiency
Union Electric Company d/b/a Ameren Missouri	OPC	ER-2012-0142	<b>Direct:</b> PY2013 EM&V results / Rebound Effect <b>Rebuttal:</b> PY2013 EM&V results <b>Surrebuttal:</b> PY2013 EM&V results <b>Direct:</b> Cycle I Performance Incentive <b>Rebuttal:</b> Cycle I Performance Incentive
Kansas City Power & Light	Missouri Public Service Commission Staff	EO-2014-0095	<b>Rebuttal:</b> MEEIA Cycle I Application testimony adopted
KCP&L Greater Missouri Operations Company	Missouri Division of Energy (DE)	EO-2014-0065	Integrated Resource Planning: Special Contemporary Topics Comments
Kansas City Power & Light	DE	EO-2014-0064	Integrated Resource Planning: Special Contemporary Topics Comments
The Empire District Electric Company	DE	EO-2014-0063	Integrated Resource Planning: Special Contemporary Topics Comments
Union Electric Company d/b/a Ameren Missouri	DE	EO-2014-0062	Integrated Resource Planning: Special Contemporary Topics Comments
The Empire District Electric Company	DE	EO-2013-0547	Triennial Integrated Resource Planning Comments
Working Case: State-Wide Advisory Collaborative	OPC	EW-2013-0519	<b>Presentation:</b> Does Better Information Lead to Better Choices? Evidence from Energy-Efficiency Labels <b>Presentation:</b> Customer Education & Demand-Side Management <b>Presentation:</b> MEEIA: Strengths, Weaknesses, Opportunities and Threats (SWOT) Analysis
Independence-Missouri	OPC	Indy Energy Forum 2014	<b>Presentation:</b> Energy Efficiency
Independence-Missouri	OPC	Indy Energy Forum 2015	<b>Presentation:</b> Rate Design
NARUC – 2017 Winter, Washington D.C.	OPC	Committee on Consumer Affairs	<b>Presentation:</b> PAYS Tariff On-Bill Financing
NASUCA – 2017 Mid-Year, Denver	OPC	Committee on Water Regulation	<b>Presentation:</b> Regulatory Issues Related to Lead-Line Replacement of Water Systems

NASUCA – 2017 Annual Baltimore,	OPC	Committee on Utility Accounting	<b>Presentation:</b> Lead Line Replacement Accounting and Cost Allocation
NARUC – 2018 Annual, Orlando	OPC	Committee on Consumer Affairs	<b>Presentation:</b> PAYS Tariff On-Bill Financing Opportunities & Challenges
Critical Consumer Issues Forum (CCIF)—New Orleans	OPC	Examining Policies for Delivering Smart Mobility	<b>Presentation:</b> Missouri EV Charging Station Policy in 4 Acts: Missouri Office of the Public Counsel Perspective
Michigan State, Institute of Public Utilities, 2019	OPC	Camp NARUC: Fundamentals	<b>Presentation:</b> Revenue Requirement
NARUC/US AID, Republic of North Macedonia, Skopje 2019	OPC	NARUC /US AID: Cybersecurity	<b>Presentation:</b> Case Study: The Missouri Experience