

Exhibit No.:
Issue(s): Energy Efficiency/
Low-Income Programs
Witness: Kory J. Boustead
Sponsoring Party: MoPSC Staff
Type of Exhibit: Rebuttal Testimony
Case No.: GR-2021-0320
Date Testimony Prepared: March 17, 2022

MISSOURI PUBLIC SERVICE COMMISSION

INDUSTRY ANALYSIS DIVISION

ENERGY RESOURCES DEPARTMENT

REBUTTAL TESTIMONY

OF

KORY J. BOUSTEAD

**THE EMPIRE DISTRICT GAS COMPANY,
d/b/a Liberty (Empire)**

CASE NO. GR-2021-0320

*Jefferson City, Missouri
March 2022*

**TABLE OF CONTENTS OF
REBUTTAL TESTIMONY OF
KORY J. BOUSTEAD
THE EMPIRE DISTRICT GAS COMPANY,
d/b/a Liberty (Empire)
CASE NO. GR-2021-0320**

1
2
3
4
5
6
7
8
9
10
11

Energy Efficiency Programs..... 2

Low-Income Programs 4

 Experimental Low-Income Program (“ELIP”) 4

 The Low-Income Weatherization Program (“LIWP”)..... 6

 Critical Needs Program 9

1 **REBUTTAL TESTIMONY**

2 **OF**

3 **KORY J. BOUSTEAD**

4 **THE EMPIRE DISTRICT GAS COMPANY,**
5 **d/b/a Liberty (Empire)**

6 **CASE NO. GR-2021-0320**

7 Q. Please state your name and business address.

8 A. Kory J. Boustead and my business address is Missouri Public Service
9 Commission, 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 (“Commission”)
12 as a Research/Data Analyst, Energy Resources Department, Industry Analysis Division, a
13 member of Commission Staff (“Staff”).

14 Q. Are you the same Kory J. Boustead who filed direct testimony on January 24,
15 2022, in this case?

16 A. Yes, I am.

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

18 A. The purpose of my rebuttal testimony is to respond to the direct testimony
19 regarding:

20 Energy Efficiency Programs

- 21 • Energy Efficiency Program Changes/Discontinuation
22 ○ The Empire District Gas Company (“Empire”) witness Nathaniel W.
23 Hackney

24 Low-Income Programs

- 25 • Experimental Low-Income Program (“ELIP”)
26 ○ Empire witness Jon Harrison;

- 1 • Critical Needs Program
- 2 ○ Office of the Public Counsel (“OPC”) witness Dr. Geoff Marke;
- 3 • Weatherization Program
- 4 ○ OPC witness Dr. Geoff Marke; and
- 5 ○ Empire witness Nathaniel W. Hackney.

6 **Energy Efficiency Programs**

7 Q. Please summarize the current Empire energy efficiency portfolio.

8 A. The current energy efficiency portfolio, approved in Case No. GR-2009-0434,
9 currently offers Low-Income Weatherization, ENERGY STAR Water Heating, ENERGY
10 STAR Space Heating, Home Performance with ENERGY STAR, Large Commercial Natural
11 Gas Audit and Rebate Program, and the Building Operator Certification (“BOC”) program, as
12 well as an annual commitment to Empire’s regional license of the Apogee online energy
13 calculator. These programs went into effect on April 1, 2010.

14 Q. Please give an overview of the proposed changes Mr. Hackney recommends to
15 the programs and Mr. Hackney’s stated reasons for the proposed changes.

16 A. In his direct testimony, Mr. Hackney has four proposed changes to the existing
17 portfolio: (1) discontinuation of three programs and reallocation of program budgets,
18 (2) continuation of two programs, (3) combination of two programs, and (4) the proposal of two
19 new programs.¹

- 20 1. Due to lack of participants, administrative burden, and insufficient incentives² the
21 following programs are proposed for discontinuation: (1) the BOC program, (2) the
22 Large Commercial Natural Gas Audit and Rebate Program, and (3) the Home

¹ Direct testimony of Nathaniel W. Hackney page 4, lines 4-14.

² Direct testimony of Nathaniel W. Hackney page 4, lines 18-21.

1 Performance with ENERGY STAR program. The existing approved budgets would
2 be reallocated within the portfolio;

3 2. The Low-Income Weatherization and the Apogee online energy calculator will stay
4 as currently approved;

5 3. The ENERGY STAR Water Heating and ENERGY STAR Space Heating programs
6 are proposed by Empire to be combined and renamed the High-Efficiency Appliance
7 Rebate Program. By combining these programs and renaming the High-Efficiency
8 Appliance Rebate Program, Empire is nearing the goal of offering unified programs
9 with Liberty-Midstates and, in doing so, providing clearer and more understandable
10 qualifications for the rebate, and equal treatment of customers in different areas of
11 Missouri.³ The program will mirror the Liberty-Midstates program in rebates and
12 eligible equipment. (See Table 1 attached as Schedule KJB-r2.)

13 4. The two new programs proposed are currently offered by Liberty-Midstates. They
14 are the (1) Energy Education program and the (2) Energize EDG Home program.
15 The budgets for these programs will be made up of the discontinued programs.

16 Q. Does Staff agree with the proposed changes?

17 A. Staff finds the proposed changes reasonable since Empire is not asking for
18 additional ratepayer funding and instead using the existing approved energy efficiency portfolio
19 budget. The proposed changes will also better align the program offerings with
20 Liberty-Midstates and potentially achieve greater participation and budget utilization.
21 (See Table 2 for currently approved program budgets and Table 3 for proposed program
22 budgets, attached as Schedule KJB-r2).

³ Direct testimony of Nathaniel W. Hackney page 5, lines 8-17.

1 **Low-Income Programs**

2 **Experimental Low-Income Program (“ELIP”)**

3 Q. Please provide an overview of the program and proposed recommendations
4 made by Empire witness Jon Harrison.

5 A. Established in Case No. GR-2004-0072 and approved by the Commission to
6 continue in Case No. GR-2009-0434 the ELIP helps provide qualified applicants residing in
7 Empire’s Sedalia service territory credit on their bill during the months of November through
8 March. The Missouri Valley Community Action Agency (“MVCAA”) agreed to oversee the
9 program administration. This includes determining if the customer meets the following
10 eligibility requirements:

- 11 1. Participant must be an Empire residential customer receiving service under the RS
12 rate schedule, weatherized in the past 3 years, or agrees to be weatherized, under the
13 Federal Low Income Weatherization Assistance Program (“LIWAP”).
- 14 2. Participant’s annual household income must be verified initially, and annually
15 thereafter, at no more than 125 percent of the Federal Poverty Level (“FPL”)
- 16 3. For purposes of determining the level of the ELIP credit to be received, the
17 participants are categorized as follows:
 - 18 a. Group A – participants whose annual income has been verified as being from
19 0 to 50 percent of FPL receives \$60 per month.
 - 20 b. Group B – participants whose annual income has been verified as being from
21 51 to 125 percent of FPL receives \$40 per month.
- 22 4. Participants who have outstanding arrearages enter into special payment agreements
23 through which the arrearages shall be deferred into a mutually agreed upon monthly
24 payment, by both the participant and Empire, not to exceed \$20 per month.

1 5. Participants must provide, via an interview or questionnaire, information related to
2 their energy use and program participation. Any information provided in these
3 interviews or questionnaires, later made public, will not be associated with the
4 participants name, street address, or telephone number.

5 6. Any provision of Empire's Rules and Regulations applicable to Empire's residential
6 customer will also apply to ELIP customers.⁴

7 Q. What changes and improvements does Empire propose making in this program?

8 A. The first change Empire proposes making to this program is a name change.
9 Empire proposes to change the name of this program from ELIP to the Low-Income
10 Affordability Program ("LIAP"). This change will align the program with the nomenclature of
11 the similarly-designed Liberty-Midstates program. The second change Empire proposes is to
12 expand eligibility for the program so that it is available to all of its residential natural gas
13 customers. Lastly, Empire requests modifying the eligibility so that customers may be
14 disqualified from the program if they do not remain on a level payment plan.⁵ Empire provided
15 necessary tariff revisions to make these changes as part of the pre-filed direct testimony of
16 Empire witness James A. Young.⁶

17 Q. Does Staff support the proposed program changes by Mr. Harrison?

18 A. Staff does not oppose the proposed changes and recommends the Commission
19 approve Empire's three proposed changes:

⁴ For the full program description the current approved program tariff is attached as Schedule KJB-r1.

⁵ Ideally this term would be defined in the tariff in Section 1. Definitions, Sheet No. R-3, in addition to the program tariff. In a review of tariff, Staff found a description of level payment plan in Section 6 METER READING, BILLING, AND COMPLAINT PROCEDURES, 6.05 Level Payment Plan Sheet No. R-36, and the term mentioned twice in Section 2 SERVICE AGREEMENTS, 2.06 Cold Weather Rule Sheet No. R-14.

⁶ Direct testimony of Jon Harrison page 15, lines 11-19.

- 1 1. To change the name Experimental Low-Income Pilot (“ELIP”) to Low-Income
2 Affordability Program (“LIAP”);
- 3 2. To expand eligibility to all residential customers within Empire’s service
4 territory; and
- 5 3. To modify the eligibility to allow for disqualification from the program if the
6 account does not remain on a level payment plan.

7 Staff further recommends the Commission to order the Company to revise tariff in Section 1
8 Definitions, Section 2 2.06 Cold Weather Rule and Section 9 9.07 Experimental Low-Income
9 Program (ELIP) to include the definition of the term “level payment plan” to alleviate confusion
10 and maintain customer education due to being a requirement for customers to remain in
11 programs.

12 **The Low-Income Weatherization Program (“LIWP”)**

13 Q. Please provide an overview of the current LIWP program.

14 A. The LIWP, originally approved by the Commission in Case No. GR-2009-0434
15 with an annual rate payer funded budget of \$71,500, is administered by the Community Action
16 Agencies, also known as Social Agencies, serving Empire’s low-income residential gas
17 customers.

18 The LIWP is designed to provide energy education and weatherization assistance for
19 lower income customers. The LIWP is intended to assist customers through conservation,
20 education, and weatherization in reducing their use of energy and to reduce the level of bad
21 debts experienced.

1 Q. Please provide an overview of the proposed recommendations to this program.

2 A. Recommendations to the LIWP have been made by (1) Empire witness
3 Nathaniel W. Hackney and (2) OPC witness Dr. Geoff Marke.

4 1. In his direct testimony, Mr. Hackney addresses proposed energy efficiency
5 program changes and reallocation of the energy efficiency portfolio budget in
6 Table NWH-3⁷. The table shows the annual budget for LIWP to be \$76,750,
7 which is an increase from the current approved annual budget of \$71,500.

8 Mr. Hackney also addresses a stipulated provision from merger docket Case No.
9 EM-2016-0213 in paragraph 24 of the Stipulation and Agreement filed on
10 August 23, 2016, and approved by Commission Order on September 7, 2016,
11 which states:

12 Empire and The Empire District Gas Company agree to provide
13 DE an annual payment totaling up to 5% of the agreed to
14 weatherization funds for a pilot program concerning the
15 administration and monitoring of the funds (not to exceed an
16 annual cap of \$12,500) to the extent DE is utilized for the
17 management of those funds. Said funds, will be provided for a
18 period of five years and be considered below the line and not
19 recovered in future rates. Nothing in this paragraph will affect
20 Staff's and OPC's ability to oppose funding for DE in future
21 cases whether for Empire or any other utility. DE shall work with
22 the OPC, Staff, and Empire to develop reporting standards for its
23 administration and monitoring activities to be presented at the
24 annual meetings with each local Community Action Agency.

25 Mr. Hackney provides an update on the administration of the program by DE, stating:

26 The Company is in its fourth year of the partnership with DE as outlined
27 by this item, with continued success and ever-improving results. Since
28 January 2018, EDG's partnership with DE allowed Community Action
29 Agencies to utilize more than \$190,000 of Empire funds to weatherize
30 more than 65 homes of gas customers in EDG's service territory⁸.

⁷ Direct testimony of Nathaniel W. Hackney, page 9, line 1.

⁸ Direct testimony of Nathaniel W. Hackney, page 10, lines 1-2.

1 2. The recommendations by OPC witness Dr. Geoff Marke are⁹:

- 2 • Empire shareholders contribute \$100K in weatherization making the
3 total amount of LIWP funding set at \$171,500 annually but would not
4 result in an increase to revenue requirement.
- 5 • The CAA's should be allowed to utilize the annual utility funding to
6 incentivize and retain employees through bonuses, be able to direct
7 funding towards marketing and be able to utilize funds on reasonable
8 "pass-over" measures related to health and safety to ensure projects are
9 completed.

10 Q. Does Staff support the recommendations from the Company and OPC?

11 A. Staff's recommendation is three part:

12 1. Staff recommends the Commission order the continuation of the LIWP
13 with the Division of Energy as program administrator as approved in the Stipulation and
14 Agreement in File No. EM-2016-0213, with payment of program administration fees to
15 be reviewed by the conclusion of the next general rate case by the stakeholders
16 (i.e., representatives of Staff, OPC, Empire) within the context of the Low Income
17 Collaborative meetings¹⁰.

18 2. Staff further recommends and supports the OPC recommendation the
19 Community Action Agencies no longer need to follow the Department of Energy
20 guidelines that govern how funds are spent. Doing so allows more agency discretion in
21 use of the program funds to ensure projects are completed and allows more customers
22 to receive the benefits of weatherization.

⁹ Direct testimony of Dr. Geoff Marke, page 3, lines 20-26.

¹⁰ Stipulation and Agreement in Case No. EM-2016-0213, page 8 paragraph 24. "Empire and The Empire District Gas Company agree to provide DE an annual payment totaling up to 5% of the agreed to weatherization funds for a pilot program concerning the administration and monitoring of the funds (not to exceed an annual cap of \$12,500) to the extent DE is utilized for the management of those funds. Said funds, will be provided for a period of five years and be considered below the line and not recovered in future rates."

1 3. Staff supports and recommends the Commission approve the OPC
2 recommendation of shareholder contribution of \$100,000 for a total of \$176,150 in
3 annual weatherization program funds, (i.e., measures related to health and safety, hiring
4 and retention of employees etc.).

5 **Critical Needs Program**

6 Q. What is the Critical Needs Program (“CNP”) proposed by OPC?

7 A. The CNP is a pilot program modeled after Baltimore Gas & Electric’s
8 (“BG&E”) CNP. “The BG&E program recognized that there are vulnerable customers who
9 may not have the capacity to research and apply for assistance, negotiate reasonable payment
10 plans, or properly navigate the application process. Yet their circumstances make them
11 particularly vulnerable to harm if they become disconnected. In response, the CNP streamlines
12 and expedites the processes to help customers stay connected. The pilot’s initial goal was to
13 implement immediate access to existing resource assistance (bill payment, repair, consumer
14 protections, etc.) to customers that seek assistance in nontraditional utility CSR [Customer
15 Service Representative] venues (e.g. hospitals, public and private assistance agencies, shelters,
16 etc.). The CNP is a voluntary program that trains Customer “navigators” who work in
17 nontraditional utility CSR venues. The navigators utilize a simple form under a “fast-track”
18 protocol that provides an expedited process that should:

- 19 • Maintain or restore utility services
20 • Avoid negative impacts on residents with serious medical conditions
21 • Address build-up of utility bill arrears
22 • Provide a streamlined process to complementary services”¹¹

¹¹ Direct testimony of Dr. Geoff Marke, page 1, line 22, page 2, lines 1-14.

Rebuttal Testimony of
Kory J. Boustead

1 Q. What are the recommendations from OPC for the CNP?

2 A. Dr. Marke recommends annual financing for the program of up to \$30K,
3 split 50/50 between ratepayers/shareholders) for the three year pilot program. Dr. Marke also
4 recommends that Empire have regular meetings that include interested stakeholders in Empire's
5 Low-Income Collaborative to see if the same level of success can be achieved for Empire's
6 gas customers while collaborating with Spire, Ameren Missouri, and The Empire District
7 Electric Company.

8 Q. Does Staff support this recommendation?

9 A. Staff finds this a reasonable recommendation for all the reasons stated by
10 Dr. Marke, and due to stakeholder support of a CNP in recent cases¹² before the Commission.

11 Q. Does this conclude your rebuttal testimony?

12 A. Yes.

¹² The CNP was most recently approved in non-unanimous stipulation and agreements in Spire (GR-2021-0108), Ameren Missouri (ER-2021-0240), and Empire District Electric (ER-2021-0312) rate cases.

BEFORE THE PUBLIC SERVICE COMMISSION

OF THE STATE OF MISSOURI

In the Matter of The Empire District Gas)
Company's d/b/a Liberty Request to File Tariffs) Case No. GR-2021-0320
to Change its Rates for Natural Gas Service)

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 *Rebuttal Testimony of Kory J. Boustead*; and that the same is true and correct according to her best knowledge and belief.

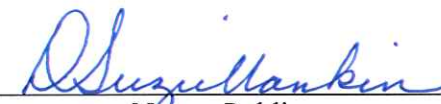
Further the Affiant sayeth not.


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 17th day of March, 2022.

D. SUZIE MANKIN
Notary Public - Notary Seal
State of Missouri
Commissioned for Cole County
My Commission Expires: April 04, 2025
Commission Number: 12412070


Notary Public

STATE OF MISSOURI, PUBLIC SERVICE COMMISSION

P.S.C. MO. No. 2 Original Sheet No. R-51a
Canceling P.S.C. MO. No. _____ Sheet No. _____

THE EMPIRE DISTRICT GAS COMPANY
JOPLIN, MO 64802

FOR: Sedalia, Missouri and Surrounding Rural Areas

RULES AND REGULATIONS
GAS

9.07 Experimental Low Income Program ("ELIP")

APPLICATION

This Experimental Low Income Program ("ELIP") is available for service billed under Schedule RS, Residential Service, to qualified natural gas space heating customers. The ELIP will provide participants with a fixed credit on their monthly bill ("ELIP Credit"). Customers participating in the ELIP program shall receive the credit during the months of November through March. This program was approved by the Missouri Public Service Commission in Case No. GR-2004-0072 and revised by the Missouri Public Service Commission in Case No. GR-2009-0434.

DEFINITIONS

Qualified Customer – An Empire customer receiving service under Schedule RS whose annual income is verified, by Missouri Valley Community Action Agency ("MVCAA"), as no greater than 125 percent of the Federal Poverty Level, as established by the poverty guidelines updated periodically in the Federal Register by the U.S. Department of Health and Human Services under the authority of 42 U.S.C. 9902 (2).

Applicant – A qualified customer who submits an ELIP application form for the ELIP credit.

Participant – An applicant who agrees to the terms of the ELIP and is designated as a qualified customer by MVCAA.

Program Funding – Annual funding for the Experimental Low Income Programs is based on the Unanimous Stipulation and Agreement in Case No. GR-2004-0072. A total of \$25,000 will be funded by Company for the experimental rate discounts. The rate discounts will consist of two tiers of credits for Company's residential gas customers in the areas served by MVCAA with incomes in the range of 0% to 125% of the Federal Poverty Level.

Agency – The social services agency serving the Sedalia, Missouri service territory that qualifies and assists ELIP customers pursuant to agreement between Company and the Agency.

AVAILABILITY

Service under this rate schedule shall be available to qualified ELIP program participants in the Sedalia, Missouri service territory who satisfy the following eligibility requirements:

1. Participant must be a Company residential customer receiving service under the RS rate schedule, who has been weatherized in the past 3 years, or agrees to be weatherized, under the Federal Low Income Weatherization Assistance Program ("LIWAP") program
2. Participant's annual household income must be verified initially, and annually thereafter, as no more than 125 percent of the Federal Poverty Level.
3. For purposes of determining the level of the ELIP credit to be received, the participants will be categorized as follows:
 - a. Group A – participants whose annual income has been verified as being from 0 to 50 percent of Federal Poverty Level.
 - b. Group B – participants whose annual income has been verified as being from 51 to 125 percent of the Federal Poverty Level.

DATE OF ISSUE: March 17, 2010
ISSUED BY: Kelly S. Walters, Vice President

EFFECTIVE DATE: April 1, 2010 FILED

Case GR-2021-0320 Missouri Public Service Commission
Schedule KJB-r1, Page 1 of 3 GR-2009-0434; YG-2010-0568

STATE OF MISSOURI, PUBLIC SERVICE COMMISSION

P.S.C. MO. No. 2 Original Sheet No. R-51b
Canceling P.S.C. MO. No. _____ Sheet No. _____

THE EMPIRE DISTRICT GAS COMPANY
JOPLIN, MO 64802

FOR: Sedalia, Missouri and Surrounding Rural Areas

RULES AND REGULATIONS
GAS

9.07 Experimental Low Income Program ("ELIP") (Continued)

4. Participants who have outstanding arrearages shall enter into special payment agreements through which the arrearages shall be paid monthly, in an amount mutually agreed upon by both the participants and Company, not to exceed \$20/month. This payment agreement will be considered a deferred payment agreement for purposes of R-31-6.09 A.
5. Participants must provide, via an interview or questionnaire, information related to their energy use and program participation. Any information provided in these interviews or questionnaires that are later made public will not be associated with the participants name, street address or telephone number.
6. Any provision of the Company's Rules and Regulations applicable to the Company's residential customer will also apply to ELIP customers.

ENERGY ASSISTANCE

1. Participants who have not previously completed an application for a Low Income Home Energy Assistance Program ("LIHEAP") grant agree to apply for a LIHEAP grant when such grants become available. Company, through the Agencies, shall assist ELIP participants with completion of LIHEAP application forms when such assistance is required.
2. Applicants agree to apply for any other available energy assistance programs identified by the Company, including the LIWAP weatherization program administered by MVCAA.

CREDIT AMOUNT

Participants will receive the ELIP credit each month during the months of November to March, as long as the participant continues to meet the ELIP eligibility requirements.

Up to 120 participants shall receive the ELIP credit in the following amounts, not to exceed the participant's monthly utility bill:

- Group A – \$60 per month
- Group B – \$40 per month

DISCONTINUANCE AND REINSTATEMENT:

Company may discontinue a participant's ELIP credit for any of the following reasons:

1. If Company, through MVCAA, determines that the participant no longer meets the eligibility requirements set forth in this tariff.
2. If the participant submits a written request to Company asking that the ELIP be discontinued.
3. If the participant does not conform to Company's rules and regulations as approved by the Missouri Public Service Commission, and as a result, the participant has Schedule RS service discontinued by the Company.

Reinstatement of the ELIP credit following discontinuance in the above circumstances and after the participant again meets the eligibility requirements will be at the discretion of the Company.

DATE OF ISSUE: March 17, 2010
ISSUED BY: Kelly S. Walters, Vice President

EFFECTIVE DATE: April 1, 2010 FILED
Missouri Public Service Commission
Case GR-2021-0320
Schedule KJB-r1, Page 2 of 3 GR-2009-0434; YG-2010-0568

STATE OF MISSOURI, PUBLIC SERVICE COMMISSION

P.S.C. MO. No. 2 Original Sheet No. R-51c
Canceling P.S.C. MO. No. _____ Sheet No. _____

**THE EMPIRE DISTRICT GAS COMPANY
JOPLIN, MO 64802**

FOR: Sedalia, Missouri and Surrounding Rural Areas

**RULES AND REGULATIONS
GAS**

9.07 Experimental Low Income Program ("ELIP") (Continued)

MISAPPLICATION OF THE ELIP CREDIT:

Providing incorrect or misleading information to obtain the ELIP credit shall constitute a misapplication of the ELIP credit. If this occurs, the Company may discontinue the ELIP credit and re-bill the account for the amount of all ELIP credits received by the participant. These funds shall be returned to the program for use by future participants. Failure to reimburse the Company for the misapplication of the ELIP credits may result in termination of customer's gas service pursuant to the Company's rules and regulations. However, nothing in this tariff shall be interpreted as limiting the Company's rights under any provisions of any applicable law or tariff.

OTHER CONDITIONS:

The ELIP program has been designed so that the Company neither profits from nor incurs losses as a result of offering this program. The Company will notify MVCAA of participants that become disqualified from the program. MVCAA will notify the Company of applicant qualification to the program by the 15th day of each month during the months of November through March. If a participant leaves the program, he/she must reapply for qualification through MVCAA, and MVCAA must notify the Company before credits will be issued to such participants. If a program participant moves to another premise in Sedalia, he/she will be considered disqualified from the program until MVCAA designates such customer as a qualified participant.

The Company will track the use of the program funds. If the \$25,000 in program funding is expended in any calendar year for subsidy credits or program administration, Company will not be obligated to provide additional program funding. The costs of administering the program, including those costs charged by MVCAA, up to 3% of the annual funding, shall be paid from the program funds.

Participation may be limited so that the projected expenditures of the program should equal the projected revenue from the program funds. The program will not be limited to fewer than 50 participants in Group A and 50 participants in Group B. ELIP credits will not be prorated between monthly bills.

The Company will gather and maintain individual participant data on usage, arrears, payments and other relevant factors to be used in the evaluation of this program, and will provide such data to the Missouri PSC Staff and Office of Public Counsel in May of each year or in response to data requests in the Company's next rate or complaint case. Any data collected by MVCAA on participant household characteristics, such as equipment saturations or efficiencies, occupancy, energy use patterns, and adoption of energy savings actions will be shared with the Company for internal evaluation purposes.

The Company shall make non-confidential data, as well as any and all internal and external program evaluations that are conducted, available to Missouri PSC Staff and Office of Public Counsel upon request.

Pursuant to a Stipulation and Agreement in Case No. GR-2004-0072, this program may be evaluated in the Company's next rate or complaint case.

DATE OF ISSUE: March 17, 2010
ISSUED BY: Kelly S. Walters, Vice President

EFFECTIVE DATE: April 1, 2010 FILED

Case GR-2021-0320 Missouri Public Service Commission
Schedule KJB-r1, Page 3 of 3 GR-2009-0434; YG-2010-0568