Exhibit No.:

Issue: Low Income Programs

Kory Boustead MO PSC Staff

Witness:
Sponsoring Party:
Type of Exhibit: Surrebuttal Testimony

ER-2016-0156 Case No.:

Date Testimony Prepared: September 2, 2016

MISSOURI PUBLIC SERVICE COMMISSION **COMMISSION STAFF DIVISION ENERGY RESOURCES**

SURREBUTTAL TESTIMONY

OF

KORY BOUSTEAD

KCP&L GREATER MISSOURI OPERATIONS COMPANY

CASE NO. ER-2016-0156

Jefferson City, Missouri September 2016

1	SURREBUTTAL TESTIMONY	
2	OF	
3	KORY BOUSTEAD	
4	KCP&L GREATER MISSOURI OPERATIONS COMPANY	
5	CASE NO. ER-2016-0156	
6	INTRODUCTION	
7	Q. Please state you name, title and business address.	
8	A. Kory Boustead, Rate & Tariff Examiner II, Missouri Public Service	
9	Commission ("Staff"), P.O. Box 360, Jefferson City, Missouri, 65102.	
10	Q. Are you the same Kory Boustead who filed in Staff's Cost of Service report?	
11	A. Yes I am.	
12	EXECUTIVE SUMMARY	
13	Q. What is the purpose of your surrebuttal testimony?	
14	A. The purpose of this testimony has two parts. The first is to respond to	
15	comments filed by The Office of the Public Counsel ("OPC") regarding KCP&L Greater	
16	Missouri Operations Company's ("GMO") low-income program, the Economic Relief Pilot	
17	Program (ERPP), and the second is to respond to comments filed by Division of Energy	
18	("DE") on the Income-Eligible Weatherization Program ("IXWN")	
19	Q. Does Staff agree with OPC's recommendation on the evaluation for the ERPP?	
20	A. Staff agrees with OPC on "the sole condition that the recommended evaluation	
21	be limited to interested parties to this case as well as the agency tasked with implementing the	
22	funds (the Salvation Army)". As stated in my previously filed testimony in this case, the	
23	survey results contained in the evaluation are insufficient, due to random sampling that did	
	¹ ER-2016-0156 Rebuttal Testimony of Dr. Geoff Marke filed August 15, 2016, page 36, lines 4-6.	

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not include customers who were removed from the program by GMO, customers that requested removal from the program and those that successfully completed the program. The survey participants were isolated to 10% of currently enrolled ERPP participants.

- Does Staff agree with the DE's recommendation to increase the Q. Income-Eligible Weatherization Program funding from the Company's proposal of \$300,000 to \$500,000?
 - A. No.
 - Q. Why does Staff disagree with increasing the funding?
- A. It is Staff's position to keep the funding for the program at \$300,000. Prior to the program transitioning to GMO's Missouri Energy Efficiency Investment Act (MEEIA) Cycle 1,² GMO's program prior to 2010 was funded at \$150,000 annually in Case No. ER-2010-0356.³ On February 17, 2009, The American Recovery and Reinvestment Act of 2009 ("ARRA") was signed by President Obama. The federal government, through the ARRA, provided special funding of \$128 million for the Missouri Weatherization Program for the period of April 2009 - March 2012 ("ARRA Period"). The ARRA provided an average of \$6,500 of weatherization for households with income at 200% or less of the Federal Policy Guidelines. In the previous three year period (2006-2008), prior to the ARRA Period, federal funding for the Missouri Weatherization Program was approximately \$18 million and the average amount of weatherization per household was \$3,000. During that time the Community Action Agencies and other local agencies ("Weatherization Agencies") made a concerted effort to utilize the ARRA funding before the March 2012 deadline.

² GMO's MEEIA Cycle I was January 26, 2013- December 31, 2015, EO-2012-0009 KCP&L Greater Missouri Operations Company's Filing for Approval of Demand-Side Programs and for Authority to Establish a Demand-Side Programs Investment Mechanism.

³ In the Matter of the Application of KCP&L Greater Missouri Operations Company for Approval to Make Certain Changes in its Charges for Electric Service, Report and Order, page 187.

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On November 15, 2012, the Commission approved GMO's request to establish a demand-side programs investment mechanism.⁴ The Company's MEEIA Cycle 1 programs went into effect on January 26, 2013. Due to the short length of time between the ARRA Period and the program being included in MEEIA, Staff wants to see how the program operates outside of MEEIA, without ARRA funding before we increase the weatherization funding.

- What is Staff's recommendation in regards to ERPP? Q.
- A. Staff's recommendation is to have a 2nd third-party evaluation which is made up of more past and present participants of the ERPP. Staff would not object to GMO's use of True North Market Insights, LLC again for the second evaluation or GMO submitting an RFP for a new evaluator, not to exceed \$50,000. The funds for the evaluation should be used from the ERPP carryover funds.
- Q. What is Staff's recommendation in regards to the Income-Eligible Weatherization?
- A. Staff recommends the Commission approve the program funds in base rates at \$300,000 as filed in my testimony in the Staff Direct Revenue Requirement Report on July 15, 2016⁵. Staff further recommends that GMO start to utilize the practice of fully contracting out all available weatherization funds, including carry-over, to the weatherization agencies.
 - Q. Does this conclude your testimony?
 - A. Yes.

⁴ EO-2012-0009 Order Approving Non-Unanimous Stipulation and Agreement Resolving KCP&L Greater Missouri Operations Company's MEEIA Filing.

⁵ ER-2016-0156 In the Matter of KCP&L Greater Missouri Operations Company's Request for Authority to Implement A General Rate Increase for Electric Service - Staff Direct Revenue Requirement Report, filed July 15, 2016, page 149, lines 15-16.

BEFORE THE PUBLIC SERVICE COMMISSION

OF THE STATE OF MISSOURI

In the Matter of KCP&L Greater Missouri) Operations Company's Request for Authority) to Implement A General Rate Increase for) Electric Service)	No. ER-2016-0156	
AFFIDAVIT OF KORY BOUSTEAD		
STATE OF MISSOURI)) ss. COUNTY OF COLE)		
COMES NOW KORY 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 BOUSTEAD		