

Exhibit No.:
Issue: Economic Relief Pilot Program
Witness: Contessa Poole-King
Sponsoring Party: MO PSC Staff
Type of Exhibit: Surrebuttal Testimony
File No.: ER-2012-0175
Date Testimony Prepared: October 10, 2012

MISSOURI PUBLIC SERVICE COMMISSION

STAFF COUNSEL DEPARTMENT

SURREBUTTAL TESTIMONY

OF

CONTESSA POOLE-KING

KCP&L GREATER MISSOURI OPERATIONS COMPANY

CASE NO. ER-2012-0175

*Jefferson City, Missouri
October 10, 2012*

1 **SURREBUTTAL TESTIMONY OF**

2 **CONTESSA POOLE-KING**

3 **KCP&L GREATER MISSOURI OPERATIONS COMPANY**

4 **CASE NO. ER-2012-0175**

5 Q. Please state your name and business address.

6 A. Contessa Poole-King, 200 Madison Street, Suite 800, Jefferson City, MO
7 65101.

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

9 A. I am a Consumer Services Coordinator with the Missouri Public Service
10 Commission (“Commission”), Staff Counsel Department.

11 Q. Are you the same Contessa Poole-King that contributed to Staff’s August 9,
12 2012 Cost of Service Report and filed rebuttal testimony in this case?

13 A. Yes, I am.

14 **EXECUTIVE SUMMARY**

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

16 A. The purpose of my testimony is to respond to the rebuttal testimony of
17 KCP&L Greater Missouri Operations Company (“GMO” or “Company”) witness Scott H.
18 Heidtbrink concerning GMO’s low-income payment program, the Economic Relief Pilot
19 Program (“ERPP” or “program”). In particular, Mr. Heidtbrink’s recommendation to expand
20 and fully implement the program, based on the results of an evaluation conducted by a third
21 party evaluator. As stated in my rebuttal testimony, the customer survey results contained in
22 the evaluation report are insufficient. The methodology used to assess customer feedback of
23 the program is isolated to 10% of currently enrolled participants and omits feedback from

1 former participants. While Staff believes additional assessment of the program is needed
2 before proceeding to permanent status with full recovery of all program cost from ratepayers,
3 Staff does support continuing the ERPP, as a pilot program, maintaining currently authorized
4 participation levels, current program terms and that funding remain 50% ratepayer and 50%
5 shareholder.

6 **RESPONSE TO REBUTTAL TESTIMONY OF SCOTT H. HEIDTBRINK, GMO**

7 Q. Company witness Scott H. Heidtbrink states on page 5, lines 16 through 18 of
8 his rebuttal testimony that, “I believe the evaluation report confirms the success of the pilot
9 phase and the Program is ready to be expanded and fully implemented.” Do you agree with
10 Mr. Heidtbrink’s assessment that the evaluation confirms the ERPP is successful and ready
11 for expansion and full implementation?

12 A. I cannot conclude the evaluation report confirms the ERPP is a successful
13 program deserving expansion and full implementation, given that the results included in the
14 evaluation lack objectivity. The evaluation report does confirm that nine out of 10 current
15 participants surveyed are satisfied with ERPP. However, the satisfied respondents are active
16 ERPP participants and currently receiving a monthly fixed credit from GMO. An 11-point
17 questionnaire was mailed to 200 of these randomly selected current enrollees; overall 144
18 responded. The evaluation excludes feedback from customers that were removed from the
19 program sometime between September 2009 when the pilot program started and March 2012,
20 when the questionnaires were mailed. Excluded from providing feedback were customers that
21 were terminated from the program by GMO and customers that completed the program in 12
22 months and no longer participating.

1 According to the direct testimony of former GMO employee Jimmy D. Alberts the
2 purpose of the customer survey was to allow participants an opportunity to address program
3 weaknesses, strengths, and provide suggestions for improvement. Mr. Heidtbrink, who
4 adopted Mr. Alberts' direct testimony, provides a similar explanation of the purpose of the
5 evaluation on page 4, lines 14 through 17 of his rebuttal testimony. Staff believes the
6 Company fails to garner the objective customer feedback they wished to obtain by limiting
7 the sampling to only 10% of active participants and excluding prior participants all together.

8 Q. In addition to the customer survey results, the evaluation report includes
9 responses from four Salvation Army employees interviewed because of their experience in
10 enrolling customers in the ERPP. Did the employees offer suggestions on how to improve the
11 ERPP?

12 A. Yes. Overall, the Salvation Army employees believe that the ERPP is
13 administered well and beneficial to qualifying customers; however, they did identify
14 opportunities for improvement. As previously stated in my rebuttal testimony, I encourage
15 the Company to consider the Salvation Army's recommendations concerning the application
16 process and qualification requirements. It is my belief the recommendations will not change
17 the terms and conditions of the program, but instead simplify the language in the customer
18 application form, increase opportunity for applicants to quality and enhance communications
19 between the applicant, GMO, and the Salvation Army.

20 Q. If Staff views the evaluation report as an insufficient measure of determining
21 the ERPP is a successful program, why is Staff recommending the program continue at all?

22 A. As I stated in my rebuttal testimony, Staff recognizes the monthly

1 “fixed-credit” helps relieve some financial hardship for customers that may not otherwise
2 qualify for other assistance programs due to the income eligibility requirements of other
3 assistance programs. Staff understands the importance of ensuring there are programs for
4 customers on fixed incomes. However, as stated in my rebuttal testimony, after a thorough
5 analysis of the data provided by the Company, Staff was unable to identify a need to expand
6 the program from 1,000 to 2,500 participants with 100% rate recovery from ratepayers of all
7 program cost. Again, the data did indicate current enrollee numbers are appropriate at this
8 time. Staff believes continuation and not expansion is most appropriate.

9 Q. What is your recommendation to the Commission?

10 A. I have three recommendations. First, the Economic Relief Pilot
11 Program (ERPP) should remain a pilot program, maintaining current program terms including
12 participation levels, and program funding should remain 50/50. Staff recommends an
13 additional pilot period to ensure this is a viable program before making it a permanent 100%
14 ratepayer funded program.

15 Second, the ERPP reports should not be submitted to the DSM Advisory Group
16 because, as stated in my rebuttal testimony, the ERPP is not a demand side management
17 program (DSM) per the Commission approved Non-Unanimous Stipulation and Agreement in
18 Case No. ER-2009-0090. Staff recommends the development of a separate advisory group
19 who is familiar with low-income customers, issues and rate programs, for all future
20 collaborative discussion regarding the ERPP.

21 Third, Staff is recommending GMO provide the Economic Relief Pilot Program report
22 to the advisory group on a monthly basis.

23

Surrebuttal Testimony of
Contessa Poole-King

1 | Q. Does this conclude your surrebuttal testimony?

2 | A. Yes, it does.


BEFORE THE PUBLIC SERVICE COMMISSION
OF THE STATE OF MISSOURI

In the Matter of Kansas City Power & Light)
Greater Missouri Operation Company's)
Request for Authority to Implement a) Case No. ER-2012-0175
General Rate Increase for Electric Service)

AFFIDAVIT OF CONTESSA POOLE-KING

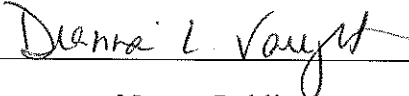
STATE OF MISSOURI)
) ss.
COUNTY OF COLE)

Contessa Poole-King, of lawful age, on her oath states: that she has participated in the preparation of the foregoing Surrebuttal Testimony in question and answer form, consisting of 5 pages to be presented in the above case; that the answers in the foregoing Surrebuttal Testimony were given by her; that she has knowledge of the matters set forth in such answers; and that such matters are true and correct to the best of her knowledge and belief.


CONTESSA POOLE-KING

Subscribed and sworn to before me this 2nd day of October , 2012.

DIANNA L. VAUGHT
Notary Public - Notary Seal
State of Missouri
Commissioned for Cole County
My Commission Expires: June 28, 2015
Commission Number: 11207377



Notary Public