

Exhibit No.:	
Issues:	Ameren Missouri's Proposed MEEIA Cycle III Low-Income Multifamily offerings
Witness:	Dana Gray
Sponsoring Party:	Tower Grove Neighborhoods Community Development Corporation
Type of Exhibit:	Rebuttal Testimony
Case No.:	EO-2018-0211
Date Testimony Prepared:	August 30, 2018

MISSOURI PUBLIC SERVICE COMMISSION

CASE NO. EO-2018-0211

REBUTTAL TESTIMONY

OF

DANA GRAY

ON

BEHALF OF

**TOWER GROVE NEIGHBORHOODS
COMMUNITY DEVELOPMENT CORPORATION**

August 30, 2018

1 **Q. Please state your name and business address.**

2 A. Dana Gray, 2337 South Kingshighway, St. Louis, MO 63110.

3 **Q. On whose behalf are you testifying?**

4 A. I am testifying on behalf of the Tower Grove Neighborhoods Community Development
5 Corporation (“Tower Grove Neighborhoods CDC,” or “TGNCDC”), a member of the
6 Community Builders Network of St. Louis. All work developing my testimony has been
7 completed by me or under my direction.

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

9 A. I am the Community Development Outreach Coordinator for the Tower Grove
10 Neighborhoods CDC. I am responsible for coordinating a Landlord Training workshop series,
11 energy conservation projects, and streetscape enhancement efforts. Tower Grove Neighborhoods
12 CDC targets housing and community development efforts in South St. Louis City. The
13 Community Builders Network of St. Louis, of which Tower Grove Neighborhoods CDC is a
14 member, is an association of nonprofit community building organizations, formed to increase the
15 capacity of member organizations, develop a more supportive community building system, and
16 raise public awareness of the need and importance for community building.

17 **Q. Please provide a summary of your qualifications and experience.**

18 A. I served as executive director of Southwest Garden Neighborhood Association for nine
19 years, coordinating landlord association meetings, energy efficiency workshops, and other
20 community related projects and activities, such as neighborhood tours, community publications,
21 and projects focused on enhancing the livability of the community. I am a founding member of
22 the Community Builders Network and have served on the Civic Capacity Building Committee
23 since 2013. In 2014 I began working with landlords through the Tower Grove Neighborhoods

1 CDC, with an expanded target audience of all of South City. I have personally owned and
2 managed residential rental properties since 2006. At present my rental properties consist of two
3 multifamily buildings (four-plexes) and two single family houses. My properties and most of the
4 properties of the landlords who attend our landlord workshops are non-subsidized affordable and
5 market-rate multifamily housing. The Tower Grove Neighborhoods CDC and other
6 organizations with which I interact through the Community Builders Network own and manage a
7 combination of subsidized and unsubsidized affordable multifamily housing.

8 **Q. Have you previously testified before this Commission?**

9 A. Yes, this is my second time testifying before this Commission. I have previously
10 submitted testimony in Ameren Missouri's Cycle II MEEIA case, File No. EO-2016-0055.

11 **Q. Please summarize your testimony.**

12 A. My testimony includes recommended approaches for Ameren Missouri's Multifamily
13 Low-Income program as part of its proposed MEEIA Cycle III energy efficiency plan. These
14 recommendations are based on my experience interacting and working closely with landlords
15 and building owners, particularly with respect to energy efficiency incentives and conservation
16 measures. In my testimony, I recommend that Ameren pursue the following approaches in order
17 to achieve its savings goals through its Multifamily Low-Income program: 1) incent at least
18 100% of the incremental cost of qualified energy efficiency measures, including installation
19 costs; 2) publish and maintain on the Ameren website an exhaustive list of all measures for
20 which the Company may provide incentives (e.g. white roofs, ENERGY STAR® doors and
21 windows, insulation, ENERGY STAR appliances, etc.), including custom measures for which
22 the Company cannot provide a definitive incentive amount, and 3) ensure the Company's
23 investment in the Low-Income community results in jobs benefitting people of color.

1 **Q. Do you generally support Ameren Missouri's proposed Multifamily Low-Income**
2 **program?**

3 A. Yes, I support the Multifamily Low-Income program and appreciate the conversations
4 between Ameren and the low-income housing stakeholders prior to filing. Ameren was very
5 open to our suggestions and willing to adopt changes to their program based on our
6 recommendations. The new program represents progress and the potential for greater savings.

7 **Q. In your experience, what is the best way to motivate landlords and property owners/**
8 **managers to invest in energy efficiency measures?**

9 A. In my work with Tower Grove Neighborhoods CDC, I have coordinated five *Energy*
10 *Efficiency for Rental Property* workshops where Ameren Missouri's contractors promoted
11 *Community Savers* and other incentive programs. Incentive levels are of great concern for
12 landlords and property owners, especially in the context of affordable housing. Based on my
13 experience working with property owners/managers, insufficient incentives are the primary
14 reason efficiency measures are not implemented.

15 **Q. What is your opinion on the appropriateness of the proposed incentive ranges for**
16 **Ameren Missouri's proposed Multifamily Low-Income program?**

17 A. My recommendation is that Ameren Missouri's incentives offered under the Multifamily
18 Low-Income cover at least 100% of the incremental cost of applicable measures. This should
19 include any relevant installation costs as well. In my opinion as a property owner and based on
20 my experience working with owners and property managers, incenting above the incremental
21 cost of the measure would achieve much higher building participation.

22 **Q. Please elaborate on why the Multifamily Low-Income incentive levels should be**
23 **higher than MEEIA Cycle II levels.**

1 A. Owners of multifamily housing, both low-income and market-rate, often have a ‘fix it
2 when it breaks’ approach to building improvements, mostly due to limited budgets. While our
3 Energy Efficiency workshops were presented to the owners and managers of multifamily
4 housing, I did not find that the rebates on HVAC equipment or building envelope measures were
5 sufficient to inspire a landlord to choose more energy-efficient equipment or pursue sealing and
6 insulating a property. Landlords often conclude they can save more money by purchasing less
7 efficient equipment or not taking any action on the building envelope. Higher utility incentive
8 programs are needed to convince owners to replace aged and inefficient HVAC systems,
9 appliances, and improve building shells. The Company’s new proposed incentive ranges are a
10 step in the right direction, but flexibility should be maintained so that the Company can offer
11 incentives beyond incremental costs.

12 **Q. What is your recommendation regarding custom measures under the Multifamily**
13 **Low-Income program?**

14 A. Without a comprehensive list of potential custom measures, owners/managers are
15 unaware of which measures are eligible. As an example, I was unaware an ENERGY
16 STAR/solar reflective roof would be considered for incentives until recent conversations with
17 Ameren, even while I coordinated and attended five workshops where Ameren presented their
18 Multifamily offerings. I recommend posting an exhaustive list of custom measures on the
19 Ameren website and sharing it at public presentations.

20 It has been my experience that property owners/managers need a great deal of
21 encouragement and personal assistance in determining program eligibility and which measures
22 are appropriate. Program descriptions can be confusing and paybacks hard to calculate. I suggest
23 that Ameren Missouri simplify its marketing efforts by describing and listing measures that will

1 be incented. The various program titles or categories are confusing, as a single building could be
2 eligible for incentives under several Ameren program categories, such as *Community Savers*,
3 *Direct Install, Residential, and Commercial*. While Ameren Missouri's move toward a one-stop
4 shop model should help alleviate this, using lay terms during marketing or promotional events
5 rather than industry specific jargon could also help increase program participation.

6 **Q. Do you have any final recommendations?**

7 A. Yes, my last recommendation is to ensure that the Company's investment in the Low-
8 Income community results in jobs for people of color. I am supportive of Annika Brink's
9 testimony on benefits for low-income communities and people of color, including job
10 opportunities.

11 **Q. Does this conclude your rebuttal testimony?**

12 A. Yes it does.

**BEFORE THE PUBLIC SERVICE COMMISSION
OF THE STATE OF MISSOURI**

In the Matter of Union Electric Company)
d/b/a Ameren Missouri's 3rd Filing to)
Implement Regulatory Changes in) File No. EO-2018-0211
Furtherance of Energy Efficiency as)
Allowed by MEEIA)

AFFIDAVIT OF DANA GRAY

CITY OF SAINT LOUIS,)
) SS
STATE OF MISSOURI)

Dana Gray, of lawful age and being first duly sworn on her oath, states:

1. My name is Dana Gray. I work in the City of St. Louis, State of Missouri and I am employed by Tower Grove Neighborhoods Community Development Corporation.

2. Attached hereto and made a part hereof for all purposes is my Rebuttal Testimony on behalf of Tower Grove Neighborhoods Community Development Corporation, which has been prepared in written form for introduction into evidence in the above-referenced docket before the Missouri Public Service Commission.

3. I hereby swear and affirm that my answers contained in the attached testimony to the questions therein propounded are true and correct.

/s/ Dana Gray
Dana Gray

Subscribed and sworn to me this 30th day of August, 2018

/s/ Rose A Palazzo
Notary Public

My commission expires: 12-12-2019

