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Witness: *Amy L. Eichholz*
Sponsoring Party: *MoPSC Staff*
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Case No.: *ER-2022-0337*
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MISSOURI PUBLIC SERVICE COMMISSION

INDUSTRY ANALYSIS DIVISION

ENERGY RESOURCES DEPARTMENT

REBUTTAL TESTIMONY

OF

AMY L. EICHHOLZ

**UNION ELECTRIC COMPANY,
d/b/a AMEREN MISSOURI**

CASE NO. ER-2022-0337

Jefferson City, Missouri
February 2023

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**TABLE OF CONTENTS OF
REBUTTAL TESTIMONY OF
AMY L. EICHHOLZ
UNION ELECTRIC COMPANY,
d/b/a AMEREN MISSOURI
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EXECUTIVE SUMMARY1
OPC RECOMMENDATIONS2
 Keeping Current and Keeping Cool Programs..... 2
 Critical Needs Program 6
CONSUMER COUNCIL OF MISSOURI RECOMMENDATIONS7
 Keeping Current and Keeping Cool Programs..... 7
 Critical Needs Program 11

1 the Critical Needs Program (“CNP”). Specifically I will be addressing recommendations that
2 Dr. Marke and Ms. Hutchinson propose for the Keeping Current and Keeping Cool Programs
3 and the CNP.

4 **OPC RECOMMENDATIONS**

5 **Keeping Current and Keeping Cool Programs**

6 Q. What is the purpose of the Keeping Current and Keeping Cool Programs?

7 A. The purpose of the Keeping Current and Keeping Cool Programs is to provide electric
8 bill payment assistance to customers meeting the eligibility requirements while assessing the
9 delivery methods used in the Program and the impacts on revenues and costs.¹

10 Q. What are the current participant monthly bill credits for the Keeping Current and
11 Keeping Cool Programs?

12 A. The Keeping Current Program monthly bill credits are:

Electric Heating Participant's Monthly Bill Credit	
0-50% FPL	\$90.00
51%-150% FPL (1)	\$60.00

Non-Electric Heating Participant's Monthly Bill Credit	
0-50% FPL	\$40.00
51%-150% FPL (1)	\$35.00

13 (1) Through December 31, 2022, the percentage shall be 300% rather than 150%

14 The Keeping Cool Program monthly bill credits are:

Participant's Monthly Cooling Bill Credit (May-September)	
0-100% FPL	\$25.00
101%-150% FPL (1)	\$25.00

15 (1) Through December 31, 2022, the percentage shall be 300% rather than 150%

¹ MO.P.S.C. Schedule No. 6 3rd Revised Sheet No. 160.

1 Q. Does OPC make any recommendations in regards to Ameren Missouri's
2 Keeping Current and Keeping Cool Programs?

3 A. Yes in Dr. Marke's direct testimony he makes eight recommendations to the
4 Keeping Current and Keeping Cool Programs.²

- 5 1. Increase Keeping Cool amount seniors receive to \$50.
- 6 2. Allow for return check fees in amount that can be covered by a pledge,
7 rather than customer have to come up with it;
- 8 3. Increase flexibility for enrollment criteria by allowing participants with
9 up to two weeks of a past due balance;
- 10 4. Increase flexibility of enrollment and continuous participation by
11 allowing or maintaining eligibility if customer is within \$25 of full
12 payment (e.g., if bill is \$100 and a customer pays Flexibility with
13 enrollment criteria – case by case \$75);
- 14 5. Increase focus on non-LIHEAP agencies and consider marketing
15 opportunities;
- 16 6. Institute automatic renewal rather than removing customers who
17 complete 24 months following a needs assessment (phone call) by an
18 Ameren or participating agency employee;
- 19 7. Institute automatic renewals every six months to motivate customers
20 (i.e., make six months of on-time payments and earn another six months
21 of credits); and

² Direct Testimony of Geoff Marke, page 31.

1 8. An increase of \$250,000 (\$125,000 apiece for shareholders and
2 ratepayers) to account for the recommendation for an increase to the
3 Keeping Cool Program bill credit.

4 Q. Does Staff agree with Dr. Marke’s recommendations concerning the Keeping
5 Current and Keeping Cool Programs?

6 A. Staff has the following recommendations to Dr. Marke’s recommendations:

7 1. For OPC recommendation (1), Staff does not oppose increasing the bill
8 credit to seniors to \$50, as this could further help alleviate the energy
9 burden of elderly participants.

10 2. For OPC recommendation (2), Staff does not fully understand what
11 Dr. Marke means by a “pledge” to allow for return check fees, rather
12 than customers having to come up with it. Staff needs more information
13 to determine rather it opposes or does not oppose Dr. Marke’s
14 recommendation. Staff has sent a data request for additional information.

15 3. For OPC recommendation (3), Dr. Marke recommends increasing
16 flexibility for enrollment criteria by allowing participants with up
17 to two weeks of the past due balance. Staff needs further information
18 to determine rather it opposes or does not oppose Dr. Marke’s
19 recommendation. Staff has sent a data request for additional information.

20 4. For OPC recommendation (4), Dr. Marke recommends increasing
21 flexibility of enrollment and continuous participation by allowing or
22 maintaining eligibility if customer is within \$25 of full payment (e.g. if
23 bill is \$100 and customer pays Flexibility with enrollment criteria – case

1 by case \$75). Staff opposes this recommendation. The Keeping Current
2 and Keeping Cool programs currently provide a bill credit to customers
3 to remain current within two billing cycles to remain as participants.
4 OPC's recommendation here may give participants a perverse incentive
5 to pay up to \$25 less on their monthly bill while continuing to receive the
6 current monthly bill credit

7 5. For OPC recommendation (5), Staff does not oppose increased focus on
8 non-LIHEAP agencies and considering marketing opportunities. This
9 recommendation should allow for additional participation.

10 6. For OPC recommendation (6), Staff does not oppose instituting automatic
11 renewal rather than removing customers who complete 24 months
12 following a needs assessment (phone call) by an Ameren or participating
13 agency employ. OPC's recommendation here would allow participating
14 customers to continue to participate if a needs assessment is confirmed
15 rather than a customer being automatically removed.

16 7. For OPC recommendation (7), Staff does not oppose instituting
17 automatic renewals every six months to motivate customers (i.e., make
18 six months of on-time payments and earn another six month of credits).
19 OPC's recommendation here could act as a motivating incentive to
20 customers utilizing the program accordingly.

21 8. For OPC recommendation (8), Staff does not oppose a modest increase
22 of \$250,000 (shared equally between shareholders and ratepayers) to
23 account for OPC recommendation (1) which Staff does not oppose.

1 **Critical Needs Program**

2 Q. What is the purpose of the Critical Needs Program (“CNP”)?

3 A. While Ameren Missouri does not currently have an approved CNP tariff sheet,
4 as stated in the current Spire Critical Needs Program,³ the purpose is to provide outreach and
5 training to community stakeholders that will allow them to identify individuals that are in
6 critical medical need for assistance and refer such individuals to available assistance resources.

7 Q. Does OPC make any recommendations to the Critical Needs Program (“CNP”)?

8 A. Yes. Ameren Missouri and its stakeholders are currently working
9 together to draft a CNP tariff sheet. However, since Dr. Marke has not received
10 confirmation from Ameren Missouri on a few remaining issues, he makes the following
11 three recommendations:

- 12 1. A customer or permanent household resident can be placed in the critical
13 needs program if they have received medical certification that
14 involuntary disconnection or suspension of utility service would
15 aggravate an existing serious illness or may prevent the use of
16 life-support equipment;
- 17 2. Customers on the program are given a 30-day reprieve from having their
18 utility shut off for non-payment; and
- 19 3. If more than one occupant in a household has been medically verified
20 for the program the 30-day reprieve will be extended an additional
21 30 days for each occupant eligible under an account.

³ P.S.C. MO. No. 9 First Revised SHEET No. R-32

1 Q. Does Staff have any concerns with Dr. Marke's recommendations in regards to
2 the CNP?

3 A. No. Staff does not oppose or have any concerns with Dr. Marke's recommendations
4 in regards to the CNP. Dr. Marke's recommendations should allow for further assistance for
5 participants in this program.

6 **CONSUMER COUNCIL OF MISSOURI RECOMMENDATIONS**

7 **Keeping Current and Keeping Cool Programs**

8 Q. What are the recommendations of CCM witness Jacqueline Hutchinson in
9 regards to Ameren Missouri's Keeping Current and Keeping Cool Programs?

10 A. In Ms. Hutchinson's direct testimony⁴ she states ten recommendations to the
11 Keeping Current and Keeping Cool Programs.

- 12 1. Program design and implementation model continues under the existing
13 collaborative model.
- 14 2. Increase the amount of monthly bill credits for Keeping Cool to \$75 for
15 those with 12 "high energy burden", as defined by the collaborative, and
16 \$50 for all other customers.
- 17 3. Increase the Keeping Current monthly bill payment to reflect energy
18 burden, with payment levels for those with highest energy burden
19 and the lowest income receiving up to \$150, as determined by the
20 collaborative.
- 21 4. Increase the length of time customers can remain in either program to
22 three years.

⁴ Direct Testimony of Jacqueline A. Hutchinson, pages 14-15.

- 1 5. Enroll all eligible Critical Needs and Rehousing customers in Keeping
2 Current and Keeping Cool Programs.
- 3 6. Increase the funding for the Keeping Current Manager, as agreed by the
4 collaborative, to continue this full-time contract employee to increase
5 access to the programs.
- 6 7. Increase the agency reimbursement for completing Keeping Current
7 Applications from \$25 to \$50. Maintain the \$25 incentive payment to
8 agencies for customers who successfully complete the program.
- 9 8. Increase the annual funding level by 1 million dollars to assure adequate
10 funding for the programs expansion details described above.
- 11 9. Continue to have biannual third party evaluations for the Keeping Current
12 and Keeping Cool programs.
- 13 10. Continue the income eligibility at 300% poverty, to be reevaluated
14 during the next Ameren Missouri rate cases.

15 Q. Does Staff agree with Ms. Hutchinson's recommendations concerning the
16 Keeping Current and Keeping Cool Programs?

17 A. Staff has the following recommendations to Ms. Hutchinson's
18 recommendations:

- 19 1. For CCM recommendation (1), Staff does not oppose the program design
20 and implementation model to continue under the existing collaborative
21 model.
- 22 2. For CCM recommendation (2), Staff opposes Ms. Hutchinson's
23 recommendation to increase the amount of monthly bill credits for

1 Keeping Cool to \$75 for those with “high energy burden”, as defined
2 by the collaborative, and \$50 for all other customers. Above, Staff
3 did not oppose OPC recommendation (1) which increased the
4 Keeping Cool Program bill credit to \$50 for seniors. Ms. Hutchinson’s
5 recommendation here not only substantially increases the bill credit to
6 all participants but requires Ameren Missouri and its stakeholders to
7 agree on what “high energy burden” means which could likely lead to
8 disagreement outside of this current general rate case.

9 3. For CCM recommendation (3), Staff opposes increasing the
10 Keeping Current Program monthly bill payment to reflect energy burden,
11 with payment levels for those with the highest energy burden and
12 the lowest income receiving up to \$150, as determined by the
13 collaborative. Ms. Hutchinson’s recommendation here again relies
14 on “high energy burden” being defined and is further complicated
15 by somehow connecting that to those with the lowest income. Staff is
16 unsure of how that would work, or if it is even possible.

17 4. For CCM recommendation (4), Staff opposes this recommendation and
18 believes it is unnecessary to increase the length of time customers can
19 remain in either program for three years. However, if Dr. Marke’s
20 recommendation for automatic renewal, as discussed above, is approved
21 (which Staff does not oppose), then customers could take part in this
22 program longer than the current 24 month enrollment period.

1 5. For CCM recommendation (5), Staff does not oppose the enrollment
2 of all eligible Critical Needs and Rehousing customers in the Keeping
3 Current Program. This recommendation should increase participation in
4 the Keeping Current Program.

5 6. For CCM recommendation (6), Staff opposes an increase of the funding
6 for the Keeping Current Manager. However, Staff does not oppose
7 continuation of this full-time contract employee in an effort to increase
8 access to the programs.

9 7. For CCM recommendation (7), Staff does not fully understand
10 CCM's recommendation here and will need further information to
11 determine rather it opposes or does not oppose Ms. Hutchinson's
12 recommendation. Staff has sent a data request for additional information.

13 8. For CCM recommendation (8), Staff opposes an increase of the annual
14 funding level by \$1,000,000. As previously mentioned, Dr. Marke
15 recommends a modest \$250,000 increase which Staff does not oppose.
16 Ms. Hutchinson's recommended increase is substantial and goes beyond
17 what Staff views necessary at this point.

18 9. For CCM recommendation (9), Staff does not oppose to continue to
19 have biannual third party evaluations of the Keeping Current and
20 Keeping Cool Programs. Evaluations have benefited these programs in
21 the past and could potentially further benefit these programs with
22 continued evaluations.

1 10. For CCM recommendation (10), Staff opposes the continuation
2 of income eligibility at 300% of the federal poverty level (“FPL”). As
3 reflected in the current Keeping Current and Keeping Cool Program’s
4 tariff sheets, the 300% FPL was only through December 31, 2022. As of
5 January 1, 2023 the 300% FPL should have reverted back to 150% FPL.
6 Staff does not believe the 300% FPL needs to continue at this point.

7 **Critical Needs Program**

8 Q. Does CCM make any recommendations to the Critical Needs Program?

9 A. Yes. Consumers Council of Missouri recommends the adoption of the
10 assumptions and model as detailed in Ms. Hutchinson’s direct testimony on pages 17 – 19.

11 Q. How does Staff respond to the assumptions and model as set forth in
12 Ms. Hutchinson’s direct testimony?

13 A. Staff does not necessarily oppose Ms. Hutchinson’s assumptions and model
14 relied on in her direct testimony. As stated above, Ameren Missouri and its stakeholders
15 are working together to develop a Critical Needs Program tariff sheet where many of
16 CCM’s assumptions and model will be considered.

17 Q. Does this conclude your rebuttal testimony?

18 A. Yes.

BEFORE THE PUBLIC SERVICE COMMISSION
OF THE STATE OF MISSOURI

In the Matter of Union Electric Company)
d/b/a Ameren Missouri's Tariffs to Adjust)
Its Revenues for Electric Service) Case No. ER-2022-0337

AFFIDAVIT OF AMY L. EICHHOLZ

STATE OF MISSOURI)
) ss.
COUNTY OF COLE)

COMES NOW AMY L. EICHHOLZ and on her oath declares that she is of sound mind and lawful age; that she contributed to the foregoing *Rebuttal Testimony of Amy L. Eichholz*; and that the same is true and correct according to her best knowledge and belief.

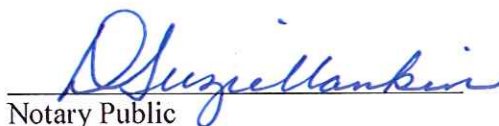
Further the Affiant sayeth not.


AMY L. EICHHOLZ

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 10th day of February 2023.

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

Amy L. Eichholz

Education and Employment Background

I am Research/Data Analyst of the Energy Resources Department, Industry Analysis Division of the Missouri Public Service Commission. Prior to my current position, I was employed at the Missouri Department of Natural Resources as an Environmental Program Analyst from January 2022 through December 2022.

I received a, Bachelor of Science degree in Business Administration in December 1997, and a minor in Marketing, all from Lincoln University, Jefferson City, Missouri.

Prior to first joining the Commission, I worked in various positions within three state agencies of the State of Missouri. I was employed as an Executive II for the HIV, STD, and Hepatitis Section of the Missouri Department of Health and Senior Services; as a Deputy Clerk for the Supreme Court of Missouri; as a Game Accounting Executive, Administrative Office Assistant, Inside Sales Representative, and a Licensing Specialist for the Missouri Lottery. From September 1999 through December 2017.