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Witness: Kimberly Dragoo
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(Midstates Natural Gas) Corp. d/b/a Liberty
Case No.: GR-2024-0106
Date Testimony Prepared: February 2024

**Before the Public Service Commission
of the State of Missouri**

Direct Testimony

of

Kimberly Dragoo

on behalf of

Liberty Utilities (Midstates Natural Gas) Corp. d/b/a Liberty

February 9, 2024



TABLE OF CONTENTS
FOR THE DIRECT TESTIMONY OF KIMBERLY DRAGOO
LIBERTY UTILITIES (MIDSTATES NATURAL GAS) CORP. D/B/A LIBERTY
BEFORE THE MISSOURI PUBLIC SERVICE COMMISSION
CASE NO. GR-2024-0106

SUBJECT	PAGE
I. INTRODUCTION.....	1
II. PURPOSE OF TESTIMONY	2
III. CURRENT PORTFOLIO	3
IV. PROPOSED CHANGES TO EE PORTFOLIO	4
V. CONCLUSION	6

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1 **I. INTRODUCTION**

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

3 1A. My name is Kimberly Dragoo. My business address is 465 Sykes Road, Fall River,
4 MA, 02720.

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

6 A. I am employed by Liberty Utilities Services Corp. (“LUSC”) as the Director of Key
7 Account and Energy Programs across all Liberty Utilities Co. Entities, including
8 Liberty Utilities (Midstates Natural Gas) Corp (“Liberty” or the “Company”).

9 **Q. On whose behalf are you testifying in this proceeding?**

10 A. I am testifying on behalf of Liberty.

11 **Q. Please describe your educational and professional background.**

12 A. I hold a Bachelor of Science degree from Bridgewater State University and an M.B.A
13 from Boston University. I have been developing and engaged in the implementation
14 of energy efficiency programs since 2002, first for National Grid as the Manager of
15 Commercial and Industrial energy efficiency programs and later as a consultant with
16 ICF where I was a Senior Director. In June of 2020, I joined Liberty as the Senior
17 Manager of Efficiency overseeing the electric, gas, and water efficiency programs in
18 the Company’s East and Central regions. In August of 2023, I transitioned into my
19 current role as Director of Key Accounts and Efficiency Programs.

20 **Q. Please describe your duties at Liberty.**

1 A. In my role as Director, I oversee customer growth and energy programs. Energy
2 programs include the development and implementation of electric, natural gas, and
3 water efficiency programs. I manage the team that implements these programs at a
4 local level, as well as vendors who act on behalf of the Company. I am responsible
5 for ensuring that our program delivery aligns with all aspects of program design and
6 presenting before the respective regulatory commissions. This includes ensuring our
7 programs meet all projected savings targets within the proposed program budgets in a
8 manner consistent with the respective cost effectiveness mechanism. Energy programs
9 also include customer product offerings outside of the energy efficiency portfolio.

10 **Q. Have you previously testified before the Missouri Public Service Commission**
11 **(“MPSC” or “Commission”) or before any other utility regulatory agency?**

12 A. Yes, I have previously testified before this Commission. I have also testified on behalf
13 of Liberty before the Iowa Utilities Board, the Massachusetts’ Department of Public
14 Utilities, the Arkansas Public Service Commission, and the New York Public Service
15 Commission.

16 **II. PURPOSE OF TESTIMONY**

17 **Q. What is the purpose of your Direct Testimony?**

18 A. In this testimony, I describe Liberty’s current energy conservation and efficiency
19 programs and present Liberty’s proposed changes to the non-weatherization
20 components of the program. The low-income weatherization program is addressed in
21 the Direct Testimony of Company witness Nathaniel W. Hackney.

1 **III. CURRENT PORTFOLIO**

2 **Q. Describe Liberty’s current energy efficiency offerings in Missouri.**

3 A. Liberty currently offers four energy efficiency opportunities: (1) Customer Education,
4 (2) Energize Liberty Homes, (3) High Efficiency Natural Gas Water Heating and Space
5 Heating Rebates, and (4) Low-income Weatherization. These programs were
6 originally developed in coordination with the Energy Efficiency Advisory Group
7 composed of the Company, Commission Staff, Office of the Public Counsel (“OPC”),
8 and the Missouri Department of Natural Resources.

9 **Customer Education:** Liberty partners with the Earthways Center of the
10 Missouri Botanical Garden (“Earthways Center”) to support the Energy Educators
11 Workshops. These workshops provide educators in the Liberty service areas with
12 materials to promote eco-friendly schools while incorporating sustainability practices
13 for energy efficiency and conservation. The teachers are equipped with a series of low-
14 or no-cost lesson plans that pair conventional teaching tools and methods with hands-
15 on activities that engage students to think critically about the various processes and
16 systems used to produce, deliver, and optimize energy usage. These activities educate
17 both teachers and students on the importance of sustainability practices and their impact
18 on the world around them.

19 **Energize Liberty Homes:** The program offers rebates on building envelope
20 upgrades, such as insulation of walls, attics, basements, and crawlspaces. Energize
21 Liberty Homes also offers rebates for HVAC replacement for qualifying customers.
22 The program aims to have fewer administrative burdens and a simple application
23 process for customers and contractors.

1 **High-Efficiency Natural Gas Water Heating and Space Heating Rebates:**

2 The program offers direct incentives to customers who install qualifying high
3 efficiency natural gas, water heating, and space heating equipment.

4 **Low-Income Weatherization:** Please see the Direct Testimony of Company
5 witness Nathaniel W. Hackney for a discussion of this offering.

6 **Q. Please describe the current budgets for the energy efficiency programs offered by**
7 **Liberty.**

8 **A. As shown in Figure 1 below, the annual budget for the four programs is currently**
9 **\$288,787.**

10 **Figure 1: Annual Program Budget**

Budget Category	2024
Weatherization	\$ 105,000
Rebates	\$ 65,000
Education	\$ 10,000
Energize LU Homes	\$108,787
Total	\$ 288,787

14 **IV. PROPOSED PORTFOLIO CHANGES**

15 **Q. Is Liberty proposing any changes to the current energy efficiency program**
16 **offerings?**

17 **A. Yes. As detailed below, Liberty is proposing certain program modifications to increase**
18 **customer access to energy efficiency products and services.**

19 **Q. Please describe Liberty’s proposed changes to the High-Efficiency Natural Gas**
20 **Water and Space Heating Rebate programs, and please discuss why the changes**
21 **are being proposed.**

22 **A. Liberty is proposing to transition the High-Efficiency Natural Gas Water Heating and**
23 **Space Heating Rebates program to an Efficient Products Program. The Efficient**

1 Products Program will continue to offer incentives for qualifying equipment through
2 downstream rebates and expand offerings to customers and their contractors through
3 an online marketplace. The marketplace structure will allow Liberty to make available
4 a mix of cost-effective energy efficiency measures at an instant discount. Measures
5 will include but not be limited to smart thermostats, showerheads, and faucet aerators.
6 The addition of this delivery channel creates an easy path for all customers to engage
7 in energy efficiency.

8 **Q. Is Liberty proposing any changes to the program budgets?**

9 A. Yes, please see Figure 2 below for the proposed Programs budgets. Liberty is
10 proposing to shift funding from the Energize Liberty Homes program to the Efficient
11 Products Program. This shift is being proposed to increase the number of customers
12 that will have access to energy savings measures. Liberty is also proposing a modest
13 addition of funding for marketing, administration, and evaluation. These are standard
14 portfolio delivery costs that have been absent from the portfolio budget.

15 **Figure 2: Proposed Program Budget**

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Budget Category	2024
Weatherization	\$ 105,000
Rebates	\$ 80,000
Education	\$ 10,000
Energize LU Homes	\$ 93,787
Subtotal	\$ 288,787
Marketing	\$5,000
Evaluation	\$5,000
Administration	\$15,990
Portfolio Subtotal	\$25,990
Total	\$314,777

1 Q. Does the proposed budget comply with the energy efficiency budget guidelines
2 agreed to in Case No. GR-2018-0013?

3 A. Yes, this budget complies with guidelines established in Case No. GR-2018-0013.

4 Q. Has the Company incorporated your proposed changes into the tariff sheets that
5 address energy efficiency?

6 A. Yes, these changes have been incorporated into the proposed Promotional Practices
7 tariff revisions as specified in Mr. Hackney's Direct Testimony. In addition, proposed
8 changes to the Energy Efficiency and Conservation tariff are presented in Direct
9 Schedule KD-1. These changes reflect the modifications to energy efficiency funding
10 outlined in section 16 of the unanimous stipulation and agreement of Case No. GR-
11 2018-0013. These tariff sheets were not previously revised.

12 Q. How will the Company track progress for the energy efficiency portfolio?

13 A. Data will be continuously gathered and reconciled monthly by the Program Manager.
14 The Program data tracked will include participant data, measures, program costs, and
15 savings.

16 Q. How will the Company report progress?

17 A. The Company will continue to file annual reports with the Commission. The Company
18 will also provide periodic updates to the Energy Efficiency Advisory Group.

19 V. CONCLUSION

20 Q. Does this conclude your Direct Testimony?

21 A. Yes, it does.

VERIFICATION

I, Kimberly Dragoo, under penalty of perjury, on this 9th day of February, 2024, declare that the foregoing is true and correct to the best of my knowledge and belief.

/s/ Kimberly Dragoo