

Exhibit No. 9

Exhibit No:	_____
Issue:	High Energy Efficiency Program Rebates Treatment of Unspent Multi-Family Low- Income Funds
Witness:	Shaylyn Dean
Type of Exhibit:	Surrebuttal Testimony
Sponsoring Party:	Spire Missouri Inc.
Case No.:	GR-2021-0108
Date Testimony Prepared:	July 14, 2021

SPIRE MISSOURI INC.

CASE NO. GR-2021-0108

SURREBUTTAL TESTIMONY

OF

SHAYLYN DEAN

JULY 14, 2021

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1 **SURREBUTTAL TESTIMONY OF SHAYLYN DEAN**

2 **I. INTRODUCTION**

3 **Q. PLEASE STATE YOUR NAME AND BUSINESS ADDRESS.**

4 A. My name is Shaylyn Dean, and my business address is 7500 E 35th Terrace, Kansas City,
5 Missouri, 64129.

6 **Q. ARE YOU THE SAME SHAYLYN DEAN WHO FILED DIRECT TESTIMONY IN**
7 **THIS CASE?**

8 A. I am.

9 **II. PURPOSE OF TESTIMONY**

10 **Q. WHAT IS THE PURPOSE OF YOUR TESTIMONY?**

11 A. The purpose of my testimony is to respond to several arguments and statements made in the
12 rebuttal testimony of Office of the Public Counsel (“OPC”) witness Geoff Marke, Missouri
13 Public Service Commission Staff (“Staff”) witness Kory Boustead, and National Housing
14 Trust (“NHT”) witness Annika Brindel, which were all filed on June 17, 2021. Specifically, I
15 will provide Surrebuttal Testimony on the following issues: (1) Staff and OPC’s
16 recommended rejection of the Company’s proposal to increase rebates for its High Energy
17 Efficiency Program and (2) clarify a misunderstanding regarding the Company’s proposed
18 treatment of unspent multi-family low-income funds.

19 **III. SPIRE’S HIGH ENERGY EFFICIENCY REBATE PROGRAM**

20 **Q. HAS SPIRE MADE ANY NOTABLE CHANGES TO ITS HIGH ENERGY**
21 **EFFICIENCY PROGRAM?**

22 A. Yes. Spire proposed increasing the energy efficiency residential rebates specifically for our
23 natural gas furnaces and smart WIFI enabled thermostats. Spire currently offers a \$200 rebate
24 for 92%-95.9% furnaces and a \$300 rebate for 96% or higher furnaces. Spire proposed

1 increasing the 92%-95.9% models to \$400 and the 96% or higher model to \$500. The
2 Company also proposed increasing the thermostat rebate to \$75 from the current \$25 level.
3 Spire made these proposed changes after reviewing the incentive levels of Missouri's other gas
4 utilities.

5 **Q. BOTH STAFF (Boustead Rebuttal, pgs. 5-6.) AND OPC (Marke Rebuttal, pgs. 11-12.)**
6 **DO NOT SUPPORT AN INCREASE TO SPIRE'S HIGH ENERGY EFFICIENCY**
7 **REBATES ABSENT A COST-BENEFIT ANALYSIS. HOW DO YOU RESPOND?**

8 A. An increase to Spire's energy efficiency rebates would make installation of energy efficiency
9 measures even more affordable to the Company's limited-income customers and potentially
10 increase these measures where they are most needed. In the alternative, if the Commission
11 decides not to issue an order supporting the Company's proposed changes to its energy
12 efficiency rebates, the Company is not opposed to providing additional information in support
13 of its rebate program and suggests the rebate level discussion be included as part of Spire's
14 quarterly Energy Efficiency Collaborative ("EEC") meetings. This will provide Spire with an
15 opportunity to invite our third party Applied Energy Group (AEG) into the discussion with our
16 Regulators regarding our benefit-cost analysis and future program planning for our next rate
17 case.

18 **Q. WHAT CHANGES DID SPIRE WANT TO MAKE TO ENHANCE THE**
19 **COMMERCIAL & INDUSTRIAL (C/I) CUSTOM AND ENERGY AUDIT**
20 **PROGRAMS?**

21 A. Spire requested that the Regulators allow the Company the ability to modify the C/I custom
22 program payback period from the current two-year level to one year and made several
23 modifications to enhance the audit rebate amounts.

1 **Q. OPC WITNESS GEOFF MARKE RECOMMENDS NOT INCREASING INCENTIVES**
2 **FOR SPIRE’S C/I PROGRAM CUSTOM MEASURES AND AUDIT BECAUSE OF A**
3 **LACK IN COST BENEFIT JUSTIFICATION. (Marke Rebuttal, pg. 12.) HOW DO**
4 **YOU RESPOND?**

5 A. Spire believes that changing the payback period from 2 years to 1 year would be beneficial to
6 our C/I customers that are dealing with COVID-19 related issues causing delays or canceled
7 projects. Spire is not asking to increase the custom rebate from the current \$100K cap
8 but instead just to enhance the payback period. The modifications regarding the rebate audits
9 were truly another effort being made on behalf of C/I customers to help move projects
10 forward. Energy audits really do help C/I customers prioritize ways to improve the entire
11 building envelope. Both changes requested for the C/I program show Spire’s commitment
12 to being environmentally friendly by reducing greenhouse gas emissions as well as energy
13 usage for our customers.

14 **IV. TREATMENT OF UNSPENT MULTI-FAMILY LOW-INCOME FUNDS**

15 **Q. STAFF WITNESS KORY BOUSTEAD (Boustead Rebuttal, p. 6.) AND OPC WITNESS**
16 **GEOFF MARKE (Marke Rebuttal, p. 12.) OPPOSE THE ROLLOVER OF UNSPENT**
17 **PROGRAM FUNDS FOR THE COMPANY’S MULTI-FAMILY LOW INCOME**
18 **PROGRAM, TO THE EXTENT THOSE FUNDS WOULD BE FOR USE WITHIN THE**
19 **COMPANY’S ENTIRE SUITE OF ENERGY EFFICIENCY PROGRAMS. HOW DO**
20 **YOU RESPOND?**

21 A. There must be some confusion in Ms. Boustead and Dr. Marke’s assessment of the Company’s
22 proposal. This use of unspent multi-family low-income program funds is not a new proposal because
23 Spire’s current Commission approved language under the Program Funding section on Sheet No.

1 R-30.12 already gives the Company the ability to roll over unspent funding for use within any
2 of the Company's energy efficiency programs. Spire's Tariff Sheet No. R-30.12 under the
3 Program Funding section it states, "any unspent funds from this sub-budget will be made
4 available for other programs in the following year." Currently, only the Low-Income Multi-
5 Family Program allows for funds to be rolled over. The new language Spire drafted for tariff
6 R-30.12 was truly looking at having the ability to rollover all Energy Efficiency Portfolio funds
7 not spent into the next program year, not just limiting the rollover to the Low-Income Multi-
8 Family funding.

9 **Q. DO YOU AGREE WITH OPC WITNESS GEOFF MARKE THAT THE UNSPENT**
10 **LOW-INCOME MULTI-FAMILY FUNDS SHOULD BE REDIRECTED TO**
11 **COMMUNITY ACTION AGENCIES ("CAAs") (Marke Rebuttal, p.12)?**

12 A. No. Spire already provides annual Low Income Weatherization funding of \$1.7M (\$950K for
13 MOE and \$750K for MOW) to 12 Community Action Agencies (CAAs) throughout our
14 footprint. Most of those agencies are having a difficult time spending the current funding with
15 many agencies working to still spend down carryover amounts from prior years. I also believe
16 the CAAs face many of the same challenges Dr. Marke mentioned as obstacles for Spire in
17 regard to spending down funding. CAAs are receiving funding from multiple sources which
18 could hinder efforts to spend down utility funding even more moving forward.

19 **Q. DOES SPIRE AGREE WITH NHT WITNESS ANNIKA BRINDEL'S TESTIMONY**
20 **REGARDING THE COMPANY'S PROPOSAL TO RUN BOTH A CO-DELIVERY AS**
21 **WELL AS A NON-CO-DELIVERY LOW-INCOME MF PROGRAM?**

22 A. Yes. Spire believes we have a great opportunity to help many of our customers that aren't
23 included in Ameren or Evergy service areas like Independence, Missouri for example where

1 Independence Power and Light overlaps with the Company. Some of the largest low-income
2 multiple family complexes in the Spire territory are in Independence.

3 **Q. DOES SPIRE AGREE WITH THE FUNDING LEVELS DISCUSSED BY NHT**
4 **WITNESS ANNIKA BRINDEL?**

5 **A.** No. Spire currently makes \$900,000 available annually for the Low-Income Multi-Family
6 Program which is the total combined amount of MOE and MOW. The testimony of NHT
7 witness Annika Brindel only addresses the \$500,000 in MOE funding which is specifically
8 available for the Spire and Ameren co-delivery program in tariff R-30.13. Spire also co-
9 delivers the program with Evergy described on tariff sheets R-30.17 and R-30.18 providing an
10 additional \$400,000 annually. This is much closer to the \$1.29M Annika is discussing in her
11 testimony.

12 **Q. NHT WITNESS ANNIKA MENTIONED THAT SPIRE HAD NO SPECIFIC ANNUAL**
13 **BUDGET AMOUNT FOR THE PROPOSED NEW NON-CO-DELIVERY MF**
14 **PROGRAM. HOW WOULD SPIRE FUND THE NON-CO-DELIVERY MF LOW-**
15 **INCOME PROGRAM?**

16 **A.** For the Non-Co-Delivery portion of the program funding Spire would have to consider any
17 unspent carryover funds from the multi-family low-income programs to develop the funding
18 parameters of the program.

19 **V. CONCLUSION**

20 **Q. DOES THIS CONCLUDE YOUR SURREBUTTAL TESTIMONY?**

21 **A.** Yes.

