

*Exhibit No.:*  
*Issues:* *Low -Income*  
*Witness:* *Amy L. Eichholz*  
*Sponsoring Party:* *MO PSC Staff*  
*Type of Exhibit:* *Direct Testimony*  
*Case Nos.:* *EO-2024-0369 and*  
*EO-2024-0370*  
*Date Testimony Prepared:* *May 24, 2024*

**MISSOURI PUBLIC SERVICE COMMISSION**  
**INDUSTRY ANALYSIS DIVISION**  
**ENERGY RESOURCES DEPARTMENT**

**DIRECT TESTIMONY**  
**OF**  
**AMY L. EICHHOLZ**

**EVERGY METRO, INC.**  
**d/b/a Evergy Missouri METRO**  
**CASE NO. EO-2023-0369**

**EVERGY MISSOURI WEST, INC.**  
**d/b/a Evergy Missouri West**  
**CASE No. EO-2023-0370**

*Jefferson City, Missouri*  
*May 24, 2024*

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**OF**  
**AMY L. EICHHOLZ**  
**EVERGY METRO, INC.**  
**d/b/a EVERGY MISSOURI METRO**  
**CASE NO. EO-2023-0369**  
  
**And**  
**EVERGY MISSOURI WEST, INC.**  
**d/b/a EVERGY MISSOURI WEST**  
**CASE NO. EO-2023-0370**

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1 **DIRECT TESTIMONY**

2 **OF**

3 **AMY L. EICHHOLZ**

4 **EVERGY METRO, INC. d/b/a EVERGY MISSOURI METRO**  
5 **CASE NO. EO-2023-0369**

6 **and**

7 **EVERGY MISSOURI WEST, INC. d/b/a EVERGY MISSOURI WEST**  
8 **CASE NO. EO-2023-0370**

9 Q. Please state your name and business address.

10 A. My name is Amy L. Eichholz, and my business address is Missouri Public  
11 Service Commission, P. O. Box 360, Jefferson City, Missouri 65102.

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

13 A. I am employed by the Missouri Public Service Commission (“Commission”) as  
14 a Research/Data Analyst for the Energy Resources Department.

15 Q. What is your educational background and work experience?

16 A. Please refer to the attached Schedule ALE-d1.

17 Q. Have you previously filed testimony before this Commission?

18 A. Yes. Please refer to the attached Schedule ALE-d1 for a list of cases in which I  
19 have previously filed testimony.

20 **EXECUTIVE SUMMARY**

21 Q. What is the purpose of your direct testimony?

22 A. I support Staff’s overall recommendation in this case that it is not reasonable at  
23 this time for the Commission to approve a Missouri Energy Efficiency Investment Act  
24 (“MEEIA”) program portfolio and its corresponding cost recovery. My direct testimony will

Direct Testimony of  
Amy L. Eichholz

1 briefly discuss certain aspects of income-eligible tariffs, program design, and federal assistance,  
2 and if the Commission determines that MEEIA programs should continue, what information  
3 the Commission should consider.

4 **INCOME-ELIGIBLE PROGRAM TARIFFS**

5 Q. Does Evergy Metro, Inc. d/b/a Evergy Missouri Metro (“EMM”) and  
6 Evergy Missouri West, Inc. Evergy Missouri West (“EMW”) (collectively “Company”  
7 or “Evergy”) currently have residential MEEIA low-income programs?

8 A. Yes, the Residential Income Eligible Single Family (“IESF”) Program<sup>1</sup> and the  
9 Residential Income Eligible Multi Family (“IEMF”) Program.<sup>2</sup>

10 Q. What customers are eligible for the IESF Program?

11 A. Evergy’s IESF Program tariff sheets state:

12 The Income Eligible Single-Family Program is designed to deliver long-term  
13 energy savings and bill reductions to residential single-family income  
14 eligible customers. This will be achieved through a variety of channels to  
15 educate customers about energy use in their homes and to offer information,  
16 products, and services to use energy wisely. This program is available during  
17 the Program Period<sup>3</sup> and is available to qualifying single-family income eligible  
18 customer’s receiving service under any generally available residential rate  
19 schedule offered by the Company.

20 Q. What customers are eligible for the IEMF Program?

21 A. Evergy’s IEMF Program tariff sheets state:

22 The Program is available for the Program Period to customers receiving service  
23 from Evergy under any residential or business rate, meeting one of the following  
24 eligibility requirements:

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<sup>1</sup> Tariff sheet P.S.C. MO. No. 2 6th Revised Sheet No.1.97 for EMM, and tariff sheet P.S.C. MO. No. 1 6<sup>th</sup> Revised Sheet No. R-64.06 for EMW.

<sup>2</sup> Tariff sheet P.S.C. MO. No. 2 Second Revised Sheet No. 1.93-1.93A for EMM, and tariff sheet P.S.C. MO. No. 1 5<sup>th</sup> Revised Sheet No. R-63.22-R-63.23 for EMW.

<sup>3</sup> April 1, 2019 – December 31, 2024.

- 1                    1. Participation in an affordable housing program. Documented participation  
2                    in a federal, state or local affordable housing program, including LIHTC<sup>4</sup>,  
3                    HUD<sup>5</sup>, USDA<sup>6</sup>, State HFA<sup>7</sup> and local tax abatement for low income  
4                    properties.  
5
- 6                    2. Location in a low-income census tract. Location in a census tract we identify  
7                    as low-income, using HUD’s annually published “Qualified Census Tracts”  
8                    as a starting point.  
9
- 10                   3. Rent roll documentation. Where at least 50 percent of units have rents  
11                   affordable to households at or below 80% of area median income, as  
12                   published annually by HUD.  
13
- 14                   4. Tenant income information. Documented tenant income information  
15                   demonstrating at least 50 percent of units are rented to households meeting  
16                   one of these criteria: at or below 200 percent of the Federal poverty level or  
17                   at or below 80% of area median income.  
18
- 19                   5. Participation in the Weatherization Assistance Program. Documented  
20                   information demonstrating the property is on the waiting list for, currently  
21                   participating in, or has in the last five years participated in the  
22                   Weatherization Assistance Program.  
23

24                    Where possible, Evergy will seek to partner with the natural gas and water  
25                    companies for co-delivery. The Company will jointly deliver the Program  
26                    with Spire Energy so that eligible customers utilizing both services may  
27                    receive energy savings from each respective utility. The Program  
28                    Administrator will provide the necessary services to effectively implement  
29                    the program, including but not limited to outreach, recruitment, providing  
30                    energy assessments/reports and direct installation of low-cost measures.  
31                    Rebates will be available as prescriptive or custom incentives, for building,  
32                    and individual improvements. Evergy’s program offering is not contingent  
33                    upon co-deliveries.

34                    Q.        On November 16, 2023, the Commission issued its Order Approving *Stipulation*  
35                    *and Agreement Extending MEEIA Cycle 3 an Additional Year* (“Stipulation”). What relevant  
36                    income-eligible terms were agreed to in the Stipulation?

37                    A.        The Signatories agreed that:

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<sup>4</sup> Low-Income Housing Tax Credit (“LIHTC”)  
<sup>5</sup> Housing and Urban Development (“HUD”)  
<sup>6</sup> United States Department of Agriculture (“USDA”)  
<sup>7</sup> Housing Finance Agency (“HFA”)

- 1 • Evergy will incentivize up to \$100,000 of direct install LED lighting measures  
2 (where halogen or incandescent bulbs are present) within the Income-Eligible  
3 Multi-Family program. Evergy will claim two years of measure life with a  
4 halogen baseline. Otherwise, no other lighting measures will be incentivized in  
5 Evergy's PY5 residential programs.  
6
- 7 • Evergy, Staff and Office of Public Counsel ("OPC") will explore opportunities  
8 to redirect up to \$1,000,000 in funding from the Income-Eligible Single-Family  
9 program towards Kansas City Low-Income Leadership Assistance  
10 Collaborative ("KC-LILAC"), for specialized services that can complement  
11 select community action agencies in minimizing deferred homes and/or  
12 enabling energy efficient custom domiciles that are subject to access and  
13 functional needs modifications and fund the Offer Center, not to include LEDs<sup>8</sup>.

14 Q. What concerns does Staff have with Evergy's current income-eligible programs?

15 A. Staff is concerned that these programs are not reaching those who are truly  
16 in need. Programs with income levels set at or below 80% of area median income ("AMI")  
17 or 200% of the Federal Poverty Level ("FPL") likely reach more mid-income customers as  
18 opposed to actual low-income customers. Staff is concerned those truly in need may be denied  
19 assistance due to homes being in disrepair. Staff's concern is because it is Staff's understanding  
20 that contractors are unable to perform a blower door test due to holes in walls, roofs, etc.  
21 Without this test, assistance cannot be granted. It is not clear to Staff if Evergy's  
22 "Income-Eligible" definition and its program availability allows for customers with homes in  
23 disrepair to opt out of the EEIC or participate in the Income-Eligible programs. These customers  
24 are the customers that are most likely to benefit for opting out of the EEIC and/or participating  
25 in the Income-Eligible programs, to whatever extent they can.

26 **FEDERAL ASSISTANCE**

27 Q. Is there federal assistance available for income-eligible customers?

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<sup>8</sup> *Unanimous Stipulation and Agreement*, filed on October 30, 2023, Case No. EO-2019-0132.

1           A.     Yes. There is federal assistance available for income-eligible  
2 individuals/families including but not limited to grants, loans, and tax incentives, several of  
3 which will be offered through the recent passage of the Inflation Reduction Act (“IRA”).

4           Q.     What is the IRA?

5           A.     The IRA is a Federally Funded program that is funneling millions of dollars into  
6 Missouri to offer rebates to help promote energy efficiency upgrades to residents and businesses  
7 of Missouri. Currently, it is projected that more than \$150 million could be available to  
8 Missouri residents to promote energy efficient upgrades in the following areas: HVAC  
9 upgrades, heat pump upgrades, weatherization, as well as other areas. These federal funds will  
10 be handled by the Missouri Division of Energy (“DOE”).

11          Q.     Is there IRA funding directed to income eligible?

12          A.     Yes. IRA funding will be available for income-eligible assistance through the  
13 following programs: Home Energy Rebates Program<sup>9</sup> & Home Electrification & Appliance  
14 Rebates Program.<sup>10</sup> Each program will have roughly \$75 million with 40%<sup>11</sup> allocated to  
15 income eligible and 10%<sup>12</sup> allocated to income eligible multi-family.

16           **INCOME-ELIGIBLE NON-MEEIA PROGRAMS**

17          Q.     Is there Income-Eligible assistance provided by Evergy outside of MEEIA?

18          A.     Yes. Throughout various rate cases over the past few years, several low-income  
19 assistance programs have been approved by the Commission. The programs available include:

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<sup>9</sup> IRA Section 50121.

<sup>10</sup> IRA Section 50122.

<sup>11</sup> Percentage of Low-Income Households (<80% AMI) in the State.

<sup>12</sup> Min 10% Low-Income Multifamily Allocation.

1                    1.     Income-Eligible Weatherization<sup>13</sup>

2                    This voluntary Weatherization Program is intended to assist qualified residential  
3                    customers in reducing their use of energy through weatherization  
4                    and conservation.

5                    2.     Rehousing Income-Eligible Pilot Program<sup>14</sup>

6                    The Rehousing Income-Eligible Pilot Program is to provide additional resources  
7                    to electric customers meeting the eligibility requirements while assessing the  
8                    delivery methods used in the Program and the impacts on revenues and costs.  
9                    This Program is provided pursuant to the Unanimous Stipulation and Agreement  
10                   approved by the Missouri Public Service Commission (MoPSC) in  
11                   Case No. ER-2021-0240.

12                  Q.     Does there need to be MEEIA programs in order to provide income-eligible  
13                  programs in the future?

14                  A.     No. These programs will continue to be provided to income-eligible customers  
15                  until modified or discontinued in a general rate case. Therefore, income-eligible customers will  
16                  continue to receive services and benefits through these programs absent MEEIA programs  
17                  Furthermore, interested stakeholders in future Ameren rate cases will have the ability to request  
18                  new programs for Commission consideration.

19                  Q.     Does this conclude your direct testimony?

20                  A.     Yes.

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<sup>13</sup> P.S.C. MO. No. 1 5<sup>th</sup> Revised Sheet No. R-60.

<sup>14</sup> Tariff sheets P.S.C. MO. No. 2 Original Sheet No. 2.37-2.38 for EMM, and P.S.C. MO. No. 1 Original Sheet No. R-62.28-R-62.29 for EMW.



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

In the Matter of Evergy Metro, Inc. d/b/a )  
Evergy Missouri Metro's Notice of Intent to ) Case No. EO-2023-0369  
File an Application for Authority to Establish )  
a Demand-Side Programs Investment )  
Mechanism )  
)  
)  
n the Matter of Evergy Missouri West, Inc. )  
d/b/a Evergy Missouri West's Notice of ) Case No. EO-2023-0370  
Intent to File an Application for Authority to )  
Establish a Demand-Side Programs )  
Investment Mechanism )

**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 *Direct 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 22nd day of May 2024.



  
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.

Case Participation History			
Case Number	Company	Issue	Exhibit
ER-2022-0337	Union Electric Company d/b/a Ameren Missouri	Low-Income	Rebuttal & Surrebuttal Testimony
ER-2022-0337	Union Electric Company d/b/a Ameren Missouri	Interest Calculation	Staff Report
EO-2023-0136	Union Electric Company d/b/a Ameren Missouri	Low-Income	Testimony & Rebuttal
EO-2023-0369_0370	Evegy Metro Inc. & Evegy Metro West	Low-Income	Testimony