

Exhibit No.:
Issue(s): Economic Relief Pilot
Program (ERPP)
Witness: Contessa J. King
Sponsoring Party: MoPSC Staff
Type of Exhibit: Direct Testimony
Case No.: ER-2024-0189
Date Testimony Prepared: June 27, 2024

MISSOURI PUBLIC SERVICE COMMISSION
FINANCIAL AND BUSINESS ANALYSIS DIVISION
CUSTOMER EXPERIENCE DEPARTMENT

DIRECT TESTIMONY

OF

CONTESSA J. KING

EVERGY MISSOURI WEST, INC.,
d/b/a Evergy Missouri West

CASE NO. ER-2024-0189

Jefferson City, Missouri
June 27, 2024

1 **DIRECT TESTIMONY**

2 **OF**

3 **CONTESSA J. KING**

4 **EVERGY MISSOURI WEST, INC.,**

5 **d/b/a Every Missouri West**

6 **CASE NO. ER-2024-0189**

7 Q. Please state your name and business address.

8 A. My name is Contessa J. King. My business address is 200 Madison Street,
9 Jefferson City, Missouri 65101.

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

11 A. I am employed by the Missouri Public Service Commission (“Commission”)
12 as the Manager of the Customer Experience Department, Financial and Business
13 Analysis Division.

14 Q. Please describe your background and relevant work experience.

15 A. I started employment with the Missouri Public Service Commission in
16 January 2002 and have served in various capacities during my tenure at the Commission. I have
17 completed numerous internal and external trainings including the Center for Public Utilities
18 regulatory training at New Mexico State University. For a complete list of previous titles and
19 education, my credentials are attached to my testimony as Schedule CJK-d1.

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

21 A. The purpose of this direct testimony is to briefly address Evergy Missouri West,
22 Inc. d/b/a Evergy Missouri West’s (“EMW”) Economic Relief Pilot Program (“ERPP” or
23 “Program”).

1 **ECONOMIC RELIEF PILOT PROGRAM (ERPP)**

2 Q. What is the Economic Relief Pilot Program?

3 A. The ERPP is a program designed to offer an opportunity to reduce the financial
4 hardship of qualifying low-income residential customers. Participants with an annual household
5 income no greater than 200% of the federal poverty level (“FPL”) can receive up to
6 a \$65.00 credit for 12 consecutive months. The monthly ERPP credit is based on each
7 qualifying customer’s average bill for the last 12 months’ bills. At the end of
8 the 12-month period, a customer may reapply to continue participation in the Program.¹
9 EMW’s community partner, The Salvation Army, conducts the screening and
10 application process.

11 Q. When did the Commission approve Evergy Missouri West’s initial request for
12 the ERPP?

13 A. The Commission approved the ERPP in Case No. ER-2009-0090 for EMW as
14 part of a Non-Unanimous Stipulation and Agreement. The ERPP started on September 1, 2009,
15 as a three-year pilot program. Commission decisions in subsequent rate cases permitted
16 continuation of the Program beyond the initial three years. Since its launch in 2009, the ERPP
17 has undergone several program design changes.

18 Q. How is the ERPP currently funded?

19 A. In EMW’s Case No. ER-2016-0156, the Commission approved ERPP funding
20 at \$788,019 annually. Program funding is split 50% shareholder and 50% ratepayer.

21 Q. Is Evergy Missouri West proposing any changes to Program funding or Program
22 design in this rate case?

¹KCP&L Greater Missouri Operations Company, PSC MO. No. 1, Currently Effective Sheets No. R-62.15, R-62.16, R-62.17, and R-62.18.

1 A. No. Evergy Missouri West is not requesting Program design modifications or
2 changes to the funding and matching mechanism currently in place. Staff witness
3 Sydney Ferguson addresses Staff’s accounting treatment of the ERPP.

4 Q. If Evergy Missouri West is not recommending funding or program design
5 changes to the ERPP, why are you providing testimony on the Program?

6 A. As previously stated, my purpose is to address the Program, but more
7 specifically, my intent is to support Staff witness Sydney Ferguson’s testimony by providing
8 the Commission additional information on the ERPP.

9 Q. Earlier in your testimony you provide background information on the ERPP.
10 What further information would you like to provide?

11 A. In the past 12 years, I have pre-filed testimony on the ERPP four times,² this
12 rate case being my fourth time analyzing the Program, each time recommending continuation
13 of the much-needed Program. Based on discovery conducted by Staff, it appears that concerns
14 raised by Staff in prior rate cases continue to be at issue. For example, EMW continues to
15 inconsistently spend allocated program funds, which is an issue that Staff witness
16 Sydney Ferguson addresses. Additionally, EMW has not conducted a comprehensive
17 evaluation of the ERPP since 2012, the first and only evaluation of the ERPP thus far.

18 Q. In rate cases No. ER-2018-0146 and ER-2022-0130, did the Commission order
19 Evergy Missouri West to conduct an extensive third-party evaluation of the ERPP or order
20 Evergy Missouri West to collaborate with stakeholders to develop a cost-effective program
21 evaluation strategy?

² Rate Case No. ER-2012-0175, *Staff’s Cost of Service Report, Rebuttal Testimony and Surrebuttal Testimony*, Rate Case No. ER-2018-0146, *Staff’s Cost of Service Report*, Rate Case No. ER-2022-0130, *Rebuttal Testimony*.

1 A. No. Despite Staff's statements that a comprehensive assessment of the ERPP is
2 needed to examine ways to maximize the potential of the Program, identify opportunities for
3 improvement, and ensure that the Program is providing the desired outcomes, the Commission
4 did not order an evaluation, nor did EMW and the parties agree to an evaluation.

5 Q. Is Staff recommending a comprehensive assessment of the ERPP in this
6 rate case?

7 A. No. Although Staff is of the opinion that an independent evaluation of the ERPP
8 is well overdue, Staff will not recommend an evaluation at this time. Given the method the
9 Program(s) is administered and structured, both Evergy Missouri Metro and Evergy Missouri
10 West should participate concurrently in any evaluation. However, the next time
11 Evergy Missouri Metro and Evergy Missouri West file simultaneous rate cases or prior to,
12 Staff is hopeful that Evergy agrees to a comprehensive program evaluation.

13 Q. Does this conclude your direct testimony?

14 A. Yes it does.

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BEFORE THE PUBLIC SERVICE COMMISSION
OF THE STATE OF MISSOURI

In the Matter of Evergy Missouri West, Inc.)
d/b/a Evergy Missouri West's Request for)
Authority to Implement A General Rate)
Increase for Electric Service) Case No. ER-2024-0189

AFFIDAVIT OF CONTESSA J. KING

STATE OF MISSOURI)
) ss.
COUNTY OF COLE)

COMES NOW CONTESSA J. KING and on her oath declares that she is of sound mind and lawful age; that she contributed to the foregoing *Direct Testimony of Contessa J. King*; and that the same is true and correct according to her best knowledge and belief.

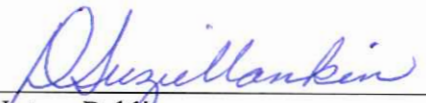
Further the Affiant sayeth not.


CONTESSA J. KING

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 18th day of June 2024.

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

Contessa J. King
Customer Experience Department
Financial and Business Analysis Division

Professional Experience:

*Regulatory Compliance Manager, Financial and Business Analysis Division & Staff Division
(November 2017-present)*

Outreach and Diversity Officer, Administration (2015-2017)

Consumer Outreach Coordinator, Administration (2013-2015)

Utility Policy Analyst I, Operations (2012-2013)

Consumer Services Coordinator/Assistant Manager, Administration & Staff Counsel (2007-2012)

Consumer Services Specialist II, Administration (2005-2007)

Senior Office Support Assistant, Adjudication (2002-2005)

Missouri Secretary of State's Office, Corporations Unit (2000-2002)

KMIZ TV - FOX 11, Benedek Broadcasting Company (1994-2000)

I graduated from the University of Missouri-Columbia with a Bachelor of General Studies (a multidisciplinary degree) areas of study: Communications, Mass Communications and Humanities. In October 2011, I attended the Center for Public Utilities regulatory training at New Mexico State University. Currently, I am enrolled in the Customer Experience Program at Lindenwood University, Professional and Continuing Education ("PACE"). Additionally, I serve on the Advisory Board of the Customer Experience Program at Lindenwood University.

Participant in the first, second, and fourth partnership exchange between the Commission and the National Energy Regulatory Agency of Moldova ("ANRE"), traveled to Chisinau, Moldova June 2010. Contributions include a two-part presentation on consumer affairs, trained ANRE delegates, assisted with the re-engineering of the Commission's Electronic Filing Information System ("EFIS") capability, developed a new workflow procedure for ANRE's petitions/complaints process and assisted with partnership coordination efforts. Partnership supported by National Association of Regulatory Utility Commissioners ("NARUC") and the United States Agency for International Development ("USAID").

Selected to participate in a partnership exchange between NARUC and the Nigerian Electric Regulatory Commission ("NERC"); traveled to Abuja, Nigeria October 2012 (partnership exchange supported by USAID). Invited to participate in a partnership exchange between NARUC and the Kenya Energy Regulatory Commission ("ERC"); traveled to Nairobi, Kenya May 2016 (partnership exchange supported by USAID and Power Africa).

In November 2023, I contributed to the USAID-NARUC Central Asia Energy Regulatory Partnership U.S. Study Tour on Regulatory Governance Program Visit to Missouri.

Case Participation:

The following is a listing of cases before the Commission in which I provided testimony, Staff recommendation(s) or significant analysis:

			Contribution
2/21/2021	AO-2021-0264	Cause of the February 2021 Cold Weather Event and its Impact on Investor Owned Utilities	Staff Report
5/11/2020	AW-2020-0356	Working Case to Consider Best Practices for Recovery of Past-Due Utility Customer Payments After the Covid-19 Pandemic Emergency	Staff Report
11/25/2019	AW-2020-0148	Working Case to Reconsider a Proposed Residential Customer Disconnection Data Reporting Rule	Analysis
6/14/2017	AW-2017-0336	General Review of Commission Rules	Analysis
6/27/2018	AW-2018-0393	Working Case for the Writing of a New Rule on the Treatment of Customer Information by Regulated Utilities and Their Affiliates and Nonaffiliates	Analysis
2/9/2011	AW-2011-0252	Working File to Consider Changes to Chapter 13 Service and Billing Practice Rules	Analysis
11/30/2022	AX-2023-0175	Proposed Rulemaking to Promulgate a New Rule Regarding a Residential Customer Disconnection Data Reporting Rule	Analysis and Testimony
9/18/2019	AX-2020-0076	Proposed Rule Regarding the Treatment of Customer Information by Commission Regulated Utilities	Analysis
11/9/2018	AX-2018-0395	Proposed Revisions to Improve the Commission's Rules (Chapter 13 Rules)	Analysis
8/29/2012	AX-2013-0091	Proposed Rulemaking to Amend 4 CSR 240-13 Service and Billing Practices for Residential Customers	Analysis
8/20/2009	AX-2010-0061	Public Counsel's Petition for Promulgation of Rules Relating to Billing and Payment Standards for Residential Customers	Analysis
11/12/2012	CA-2013-0271	New Horizons Communications Corp. - Application for Certificate	Staff Recommendation
5/9/2013	CA-2013-0492	Giant Communications, Inc. - Application for Certificate	Staff Recommendation
6/28/2013	CA-2013-0548	FidelityLink, LLC - Application for Certificate	Staff Recommendation
7/30/2013	CO-2014-0025	Metropolitan Telecommunications of Missouri, Inc. – Application to Expand Certificate of Basic Local Service Authority	Staff Recommendation

Date Filed in EFIS	Case Number	Company Name – Type of Case	Contribution
9/15/2023	EC-2024-0092	Staff of the Missouri Public Service Commission vs. Evergy Metro, Inc d/b/a Evergy Missouri Metro and Evergy Missouri West, Inc d/b/a Evergy Missouri West	Analysis
1/18/2019	EC-2019-0168	Jill Covington Beatty v. Ameren Missouri - Complaint Case	Staff Report and Testimony
10/31/2017	EC-2018-0113	Anthony R. Granillo v. Ameren Missouri - Complaint Case	Analysis
6/17/2022	EE-2022-0071	Evergy Metro, Inc. d/b/a Evergy Missouri Metro and Evergy Missouri West, Inc. d/b/a Evergy Missouri West Request for a Waiver of Various Tariffs and Regulations Related to Automated Metering Infrastructure (AMI)	Analysis
10/02/2019	EE-2019-0382	Ameren Missouri's Request for a Waiver to Various Tariffs and Regulation to Enable the Deployment of Automated Metering Infrastructure (AMI) Beginning in 2020	Analysis
1/12/2018	EM-2018-0012	Application of Great Plains Energy Incorporated for Approval of its Merger with Westar Energy, Inc.	Analysis
5/4/2021	EO-2021-0361	In the Matter of the Cause of the February 2021 Cold Weather Event and its Impact on The Empire District Electric Company d/b/a Liberty	Staff Report
5/4/2021	EO-2021-0360	In the Matter of the Cause of the February 2021 Cold Weather Event and its Impact on Evergy Missouri Metro, Inc. d/b/a Evergy Missouri Metro	Staff Report
5/4/2021	EO-2021-0359	In the Matter of the Cause of the February 2021 Cold Weather Event and its Impact on Evergy Missouri West, Inc. d/b/a Evergy Missouri West	Staff Report
5/4/2021	EO-2021-0358	In the Matter of the Cause of the February 2021 Cold Weather Event and its Impact on Union Electric Company, Inc. d/b/a Ameren Missouri	Staff Report
8/6/2020	EO-2021-0032	An Agreement Between Evergy, Inc., and Elliott Management, Inc.	Staff Report
11/6/2018	EO-2019-0132 EO-2019-0133	Kansas City Power & Light Company's Notice of Intent to File an Application for Authority to Establish a Demand-Side Programs Investment Mechanism	Analysis
8/25/2014	EO-2015-0055	Ameren Missouri's 2nd Filing to Implement Regulatory Changes in Furtherance of Energy Efficiency as Allowed by MEEIA - Flex Pay Application Filed 11/30/2017	Analysis

Date Filed in EFIS	Case Number	Company Name – Type of Case	Contribution
1/24/2023	ER-2022-0337	In the Matter of Union Electric Company d/b/a Ameren Missouri's Tariffs to Adjust Its Revenues for Electric Service	Direct – Class Cost of Service, Surrebuttal
7/13/2022	ER-2022-0129	Evergy Metro, Inc. d/b/a Evergy Missouri Metro - General Rate Increase	Rebuttal Testimony
7/13/2022	ER-2022-0130	Evergy Missouri West, Inc. d/b/a Evergy Missouri West - General Rate Increase	Rebuttal Testimony
5/28/2021	ER-2021-0312	The Empire District Electric Company d/b/a Liberty – General Rate Case	Direct – Cost of Service Staff Report, Rebuttal
7/3/2019	ER-2019-0335	Union Electric Company d/b/a Ameren Missouri – General Rate Case	Direct – Class Cost of Service Staff Report, Rebuttal
6/18/2018	ER-2018-0145	Kansas City Power & Light Company - General Rate Case	Direct – Cost of Service Staff Report
6/18/2018	ER-2018-0146	KCP&L Greater Missouri Operations Company - General Rate Case	Direct – Cost of Service Staff Report
12/1/2011	ER-2012-0174	Kansas City Power & Light Company - General Rate Case	Direct, Rebuttal, Surrebuttal
12/1/2011	ER-2012-0175	KCP&L Greater Missouri Operations Company - General Rate Case	Direct, Rebuttal, Surrebuttal
9/8/2023	ET-2024-0061	In the Matter of the Joint Application of Evergy Metro, Inc. d/b/a Evergy Missouri Metro and Evergy Missouri West, Inc. d/b/a Evergy Missouri West for Approval of Tariff Revisions to TOU Program	Staff's Interim Recommendation, Staff's Second Interim Recommendation
9/21/2020	ET-2021-0082	Union Electric Company d/b/a Ameren Missouri for Approval of its Surge Protection Program	Staff Report
12/19/2022	EW-2023-0199	Collaborative Workshop for Customer Education and Outreach Regarding the Introduction of Default Time-of-Use Rates by Evergy Missouri	Staff Comments Analysis
8/6/2012	EW-2013-0045 GW-2013-0046 WW-2013-0047	Working Case (Consolidated) to Consider the Establishment of a Low-Income Customer Class or Other Means to Help Make Utility Services Affordable	Analysis
12/5/2019	GC-2020-0057	William L. Hackney & Catrina Hackney v. Spire – Complaint Case	Analysis
6/15/2018	GC-2018-0377	Imri Meiron v. Spire - Complaint Case	Analysis
12/6/2017	GC-2018-0159	Lisa Lambert v. Spire - Complaint Case	Analysis
1/22/2013	GC-2013-0361	William Wehrle v. Laclede Gas Company – Complaint Case	Analysis
2/2/2006	GC-2006-0318	Staff v. Laclede Gas Company - Complaint Case	Analysis

Date Filed in EFIS	Case Number	Company Name – Type of Case	Contribution
1/21/2022	GO-2022-0022	Staff's Investigation of Spire STL Pipeline's Application at FERC for a Temporary Certificate to Operate	Staff Report
5/3/2021	GO-2021-0367	In the Matter of the Cause of the February 2021 Cold Weather Event and its Impact on Summit Natural Gas of Missouri, Inc.	Staff Report
5/3/2021	GO-2021-0366	In the Matter of the Cause of the February 2021 Cold Weather Event and its Impact on Liberty Utilities (Midstates Natural Gas) Corp. d/b/a Liberty	Staff Report
5/3/2021	GO-2021-0365	In the Matter of the Cause of the February 2021 Cold Weather Event and its Impact on The Empire District Gas Company, d/b/a/ Liberty	Staff Report
5/3/2021	GO-2021-0364	In the Matter of the Cause of the February 2021 Cold Weather Event and its Impact on Spire Missouri, Inc. d/b/a Spire Missouri East	Staff Report
5/3/2021	GO-2021-0363	In the Matter of the Cause of the February 2021 Cold Weather Event and its Impact on Spire Missouri, Inc. d/b/a Spire Missouri West	Staff Report
5/3/2021	GO-2021-0362	In the Matter of the Cause of the February 2021 Cold Weather Event and its Impact on Union Electric Company, Inc. d/b/a Ameren Missouri	Staff Report
3/16/2018	GO-2018-0251	Investigation of Customer Service Issues at Spire Missouri, Inc.	Staff Report
1/17/2018	GO-2018-0195	Investigation into the Interruption Of Summit's Gas Deliveries in the Lebanon, Missouri Region	Analysis
1/24/2022	GR-2021-0320	The Empire District Gas Company d/b/a Liberty – General Rate Case	Direct – Cost of Service
4/13/2018	GR-2018-0013	Liberty Utilities (Misstates Natural Gas) Corp. d/b/a Liberty Utilities – General Rate Case	Analysis
1/24/2013	TA-2013-0363	Matrix Telecom, Inc. d/b/a VarTec Telecom – Application for Certificate	Staff Recommendation
1/24/2013	TA-2013-0364	Matrix Telecom, Inc. d/b/a Excel Telecommunications – Application for Certificate	Staff Recommendation
4/23/2013	TA-2013-0464	TNCI Operating Company LLC – Application for Certificate	Staff Recommendation
9/24/2013	TA-2014-0083	Angel Americas, LLC – Application for Certificate	Staff Recommendation
11/15/2012	TD-2013-0275	360networks (USA), Inc. - Cancellation of Certificate of Service Authority	Staff Recommendation
11/15/2012	TD-2013-0276	AboveNet Communications, Inc. - Cancellation of Certificate of Service Authority	Staff Recommendation
7/8/2019	WC-2019-0324	Cordney Jack Travis v. Missouri-American Water Company – Complaint Case	Analysis

Date Filed in EFIS	Case Number	Company Name – Type of Case	Contribution
3/3/2006	WC-2006-0345	Dione C. Joyner v. Missouri-American Water Company - Complaint Case	Staff Recommendation
12/15/2017	WR-2018-0170 SR-2018-0171	Liberty Utilities (Missouri Water) - Small Utility Rate Case	Analysis