

*Exhibit No.:*  
*Issue(s):* Low Income Programs  
*Witness:* Amy L. Eichholz  
*Sponsoring Party:* MoPSC Staff  
*Type of Exhibit:* Rebuttal Testimony  
*Case No.:* GR-2024-0106  
*Date Testimony Prepared:* August 22, 2024

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

**REBUTTAL TESTIMONY**

**OF**

**AMY L. EICHHOLZ**

**LIBERTY UTILITIES (Midstates Natural Gas) CORP.,**  
**d/b/a Liberty**

**CASE NO. GR-2024-0106**

*Jefferson City, Missouri*  
*August 2024*

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REBUTTAL TESTIMONY OF**

**AMY L. EICHHOLZ**

**LIBERTY UTILITIES (Midstates Natural Gas) CORP.,  
d/b/a Liberty**

**CASE NO. GR-2024-0106**

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1 **FINANCIAL ASSISTANCE PROGRAMS**

2 Q. What financial assistance programs does Liberty Midstates offer?

3 A. Liberty Midstates offers the Low-Income Affordability Program (“LIAP”),  
4 the Low-Income Weatherization Assistance Program (“LIWAP”), and the  
5 Red Tag Repair Programs.

6 •**LIAP**: The LIAP offers monthly stipends to customer’s equivalent to the fixed  
7 Customer Charge on their bills and offers an additional \$30 credit during the winter months  
8 (November-April).

9 •**LIWAP**: The LIWAP provides weatherization assistance to customers who  
10 financially qualify through registration with one of six Community Action Agencies (“CAA”)  
11 in the Liberty Midstates service territory.

12 •**Red Tag Repair**: The Red Tag Repair Program allows customers to receive funding  
13 towards minor repairs or replacements of their gas appliances and piping in order to obtain or  
14 retain service. The program can also offer funding to help an assistance agency pay for the  
15 replacement of a qualifying piece of equipment (i.e., furnace, boiler, or water heater).

16 Q. What change does Liberty Midstates propose for the LIAP?

17 A. The tariff currently states that customers must register with their local CAA and  
18 must meet the threshold of 135 percent of the Federal Poverty Level (“FPL”). The Company  
19 wishes to modify this threshold to match the current threshold for qualification for the  
20 Low-Income Home Energy Assistance Program (“LIHEAP”), which is currently 60 percent of  
21 the State Median Income. A second reference to FPL was also removed from the tariff,  
22 this one related to the eligibility for the additional \$30 credit offered during the winter months.

23 Q. Does Staff support Liberty Midstates proposed changes for the LIAP?

1           A.     Yes. Staff believes that making these changes will minimize administrative  
2 burden on both the Company and the CAAs. It also aids in the consistency, as FPL is no longer  
3 Missouri’s standard for LIHEAP. Severing this tie to FPL ensures that all customers enrolled  
4 in the programs will receive the credit during the winter months.

5           Q.     What change does Liberty Midstates propose for LIWAP?

6           A.     The program tariff sheets currently state that the Company will make payments  
7 to Environmental Improvement and Energy Resource Authority (“EIERA”) annually,  
8 which will fund the Missouri Department of Natural Resources’ (“MDNR” or “DNR”)  
9 administration of the program. As stipulated in the Company’s last rate case,  
10 Case No. GR-2018-0013<sup>1</sup>, the company currently contracts directly with CAAs in its service  
11 territory to operate this program.

12          Q.     Does Staff support Liberty Midstates proposed changes for the LIWAP?

13          A.     Yes. Liberty’s proposed change will make its tariff consistent with the  
14 stipulation from Case No. GR-2018-0013.

15          Q.     Is the Company proposing any further administrative changes to this program?

16          A.     Yes. The Company proposes removing from the restrictions on both  
17 cost-per-home and overall administrative costs. This shift is attributable, at least in part,  
18 to significant increases in the fluidity of costs of administering these programs.

19          Q.     Does Staff support removing the restrictions on the cost-per-home and overall  
20 administrative costs?

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<sup>1</sup> *Unanimous Stipulation and Agreement*, article 16, pages 17-20. Filed May 24, 2018.

1           A.     Yes. The Company has allowed the CAAs more discretion and consider this a  
2 stellar level of service that they would still be able to operate efficiently without these  
3 restrictions. If the restrictions ever needed to be imposed they can be modified at any time.

4           Q.     What change does Liberty Midstates propose for the Red Tag Repair Program?

5           A.     The Red Tag Program had been previously outlined at 185 percent of FPL and  
6 was modified to match the low-income standard for LIWAP. Increasing this to be tied to the  
7 standard for LIWAP will minimize the administrative burden on the CAAs and Liberty,  
8 and will ensure that the tariff will stay accurate even if the LIWAP standard were to change  
9 from its current position of 200 percent FPL.

10          Q.     Does Staff support Liberty Midstates proposed change for the  
11 Red Tag Repair Program?

12          A.     Yes. Staff believes this change will further help this program achieve its goal of  
13 allowing customers to receive funding toward minor repairs or replacements of their gas  
14 appliances and piping in order to obtain or retain gas service.

15           **LIBERTY'S CURRENT ENERGY EFFICIENCY OFFERINGS**

16          Q.     What does Liberty Midstates currently offer for energy efficiency in Missouri?

17          A.     Liberty Midstates currently offers four energy efficiency opportunities:  
18 (1) Customer Education, (2) Energize Liberty Homes, (3) High Efficiency Natural Gas Water  
19 Heating and Space Heating Rebates, and (4) Low-income Weatherization. These programs  
20 were originally developed in coordination with the Energy Efficiency Advisory Group  
21 composed of the Company, Commission Staff, Office of the Public Counsel ("OPC"),  
22 and MDNR.

1 Q. What change is Liberty Midstates proposing to the current energy  
2 efficiency program?

3 A. Liberty Midstates is proposing program modifications to increase customer  
4 access to energy efficiency products and services.

5 Q. Does Staff support Liberty Midstates proposed changes for the current energy  
6 efficiency programs?

7 A. Yes, as further discussed below.

8 Q. Does Liberty Midstates propose any changes to the High-Efficiency Natural Gas  
9 Water and Space Heating Rebate programs?

10 A. Liberty Midstates is proposing to transition the High-Efficiency Natural Gas  
11 Water Heating and Space Heating Rebates program to an Efficient Products Program.  
12 The Efficient Products Program will continue to offer incentives for qualifying equipment  
13 through downstream rebates and expand offerings to customers and their contractors through  
14 an online marketplace.

15 Q. Does Staff support Liberty Midstates proposed change for the High-Efficiency  
16 Natural Gas Water and Space Heating Rebate programs?

17 A. Yes. Staff believes the marketplace structure will allow Liberty Midstates to  
18 make available a mix of cost-effective energy efficiency measures at an instant discount.

19 Q. What change is Liberty Midstates proposing to the program budget?

20 A. Liberty Midstates is proposing to shift funding from the Energize Liberty Homes  
21 program to the Efficient Products Program. This shift is being proposed to increase the number  
22 of customers that will have access to energy savings measures. Liberty Midstates is also

Rebuttal Testimony of  
Amy L. Eichholz

1 proposing a modest addition of funding for marketing, administration, and evaluation.

2 These are standard portfolio delivery costs that have been absent from the portfolio budget.

3 Q. Does Staff support the program budget change?

4 A. Yes. Staff believes this change will benefit all eligible customers via the funding  
5 and will improve energy efficiency within the home and reduce energy consumption.

6 Q. Does this conclude your rebuttal testimony?

7 A. Yes.



**BEFORE THE PUBLIC SERVICE COMMISSION**

**OF THE STATE OF MISSOURI**

In the Matter of the Request of Liberty )  
Utilities (Midstates Natural Gas) Corp. ) Case No. GR-2024-0106  
d/b/a Liberty to Implement a General Rate )  
Increase for Natural Gas Service in the )  
Missouri Service Areas of the Company )

**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 14<sup>th</sup> day of August 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

**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.

<b>Amy L. Eichholz</b>			
<b>Case Participation History</b>			
<b>Case Number</b>	<b>Company</b>	<b>Issue</b>	<b>Exhibit</b>
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	Evergy Metro Inc. & Evergy Metro West	Low-Income	Testimony