

1

Exhibit No.:

Issues: Property Manager Portal

Witness: Dana Gray

Sponsoring Party: Renew Missouri
Advocates

Type of Exhibit: Rebuttal Testimony

Case No.: ER-2024-0319

Testimony Filed: January 17, 2024

2

3

4

5

MISSOURI PUBLIC SERVICE COMMISSION

6

ER-2024-0319

7

8

REBUTTAL TESTIMONY

9

10

OF

11

12

DANA GRAY

13

14

ON BEHALF OF

15

16

RENEW MISSOURI ADVOCATES

17

18

19

20

January 17, 2024

21

22

1 **Table of Contents**

2 ***I. INTRODUCTION..... 3***

3 ***II. THE PMP..... 4***

4 ***III. PRIVACY CONCERNS..... 5***

5 ***IV. BEEP..... 6***

6 ***V. CONCLUSION 7***

7

8

1 **I. INTRODUCTION**

2 **Q: Please state your name, title, and business address.**

3 A: My name is Dana Gray. I serve as the Community Development Outreach Coordinator at
4 Tower Grove Community Development Corp (“Tower Grove CDC”), located at 2337
5 Kingshighway Blvd, St. Louis, MO 63110.

6 **Q: Please describe your experience.**

7 A: Our organization was incorporated as a not-for-profit entity in 1981. Tower Grove CDC is
8 an affordable housing provider. The majority of our tenants have incomes at 50-80% of the
9 area median. At present, Tower Grove CDC has 80 rental units, most of which are historic
10 4-unit buildings, and we are constructing a 64-unit Senior housing complex, supported by
11 Low-Income Housing Tax credits. Tower Grove CDC has been active in the Missouri
12 Energy Efficiency for All coalition since 2015 and I serve as the state lead. During my
13 tenure at Tower Grove CDC, I have coordinated a Landlord & Rehabber Training program
14 and the organization provides a tenant screening service, HomeScreen
15 (www.MyHomeScreen.org). With these endeavors, our organization has established
16 relationships with hundreds of area landlords. I have been a landlord since 2007, and I
17 personally manage my 9 rental units, which include two 4-unit buildings and a single-
18 family house. These are all older, historic properties in St. Louis City. I’ve attached as
19 Schedule DG-R-1 my credentials.

20 **Q: What is the purpose of your testimony?**

21 A: The purpose of my testimony is to respond to Geoff Marke of the Office of Public
22 Counsel’s (OPC) testimony surrounding privacy and liability concerns associated with the
23 Company’s Property Manager Portal (“PMP” or “Portal”). I also address property owner
24 access to individual utility meter data, with account holder consent. Access is essential to

1 meet energy efficiency goals, provide affordable housing, and provide accurate estimates
2 for utility costs to renters.

3 **Q: What is your recommendation to the Commission in this case?**

4 A: I recommend that Union Electric Company d/b/a Ameren Missouri (“Ameren Missouri”
5 or the “Company”) continues to allow property owners’ access to individual meter data
6 through the PMP, and BEEP, with account holder consent, at no cost to the property
7 owners.

8 **II. THE PMP**

9 **Q: Is the PMP useful for property owners and tenants alike?**

10 A: Yes. At the Missouri Energy Efficiency Investment Act – Low-Income Work Group
11 meetings, tenant advocates have spoken favorably of Rental Energy Disclosures. I have
12 been utilizing Ameren Missouri’s PMP to assess the average energy consumption at all
13 Tower Grove CDC’s property. This is very useful for supporting information included in
14 Energy Disclosures, so renters can know the approximate energy costs for a rental unit. I
15 use PMP data to disclose the average energy costs when advertising my vacant rental units.
16 I have encountered numerous renters throughout the community that struggle to pay utility
17 bills. When the renter is informed of the average gas and electric costs prior to lease
18 signing, it helps them determine if a property is within their household budget.

19 It is a typical property management practice to include a clause in a rental lease, stating
20 electric and gas utilities must be maintained to avoid freezing and damage to the property.
21 If electric or gas utilities are not maintained by the tenant, it can be grounds for terminating
22 the lease. Therefore, I believe providing accurate energy cost estimates utilizing the PMP

1 for Rental Energy Disclosures could prevent eviction situations. The Cities of St. Louis
2 and Kansas City have been discussing Rental Energy Disclosure policies.

3 **III. PRIVACY CONCERNS**

4 **Q: What is your opinion of OPC’s position that the PMP poses privacy concerns for**
5 **customers?**

6 A: I do not agree. The Company does not reveal the name of the account holder nor real time
7 usage data in the PMP. As I was preparing this rebuttal testimony, I logged into the Portal
8 to confirm the account holder’s name is not listed. In response to Geoff Marke’s testimony,
9 pages 18-19, ** [REDACTED]

10 [REDACTED]

11 [REDACTED]** Of course, no one would ever want that sort of situation to ever occur. While
12 Ameren Missouri will need to confirm that the PMP does not reveal the account holders’
13 name, I have investigated on my own and do not find any personal names listed on the site.
14 Usage data is provided as an average, not real time, by unit number and/or property address.
15 An example can be found in Figure 1.

1 Figure 1 is Confidential in its entirety.

2 **IV. BEEP**

3 **Q: Please explain how BEEP and the PMP contribute to Energy Efficiency initiatives.**

4 A: Of course. At Tower Grove CDC and with my personal rental units, I have been
5 benchmarking the gas and electric, to track how building improvements impact the energy
6 usage. The benchmarking efforts aspire to create more affordable, healthy, and comfortable
7 homes for our tenants. When Ameren established the BEEP website, I acted as a test pilot
8 and shared feedback on the website’s performance, the challenges encountered, and
9 provided suggestions for improvement. The BEEP website supports Benchmarking
10 initiatives. For our Benchmarking activities, we obtain permission from the tenants to
11 access their month-by-month energy data. Our permission letters provide for access to the
12 energy data from move-in to move-out date. The City of St. Louis and the City of Kansas
13 City have Benchmarking ordinances, requiring property owners with buildings 50,000
14 square feet or larger to annually report their energy use. Ameren’s BEEP page supports the
15 St. Louis Benchmarking ordinance. An example can be seen in Figure 2.

1 Figure 2: Data from BEEP website

Electric data obtained by Tower Grove CDC via Ameren BEEP website Dec 2024

This is an example of the electric data provided by Ameren for a Tower Grove CDC apartment in St. Louis, MO, for **Benchmarking** purposes.

Tower Grove CDC obtained the tenants' permission to access the data, from the date of move-in to move-out.

From	To	Usage	Product
10/1/2023	10/31/2023	935.5266	kWh
11/1/2023	11/30/2023	749.4498	kWh
12/1/2023	12/31/2023	810.5844	kWh
1/1/2024	1/31/2024	1036.5564	kWh
2/1/2024	2/29/2024	712.836	kWh
3/1/2024	3/31/2024	637.2438	kWh
4/1/2024	4/30/2024	798.063	kWh
5/1/2024	5/31/2024	1286.04	kWh
6/1/2024	6/30/2024	2854.3428	kWh
7/1/2024	7/31/2024	2766.7794	kWh
8/1/2024	8/31/2024	2797.8978	kWh
9/1/2024	9/30/2024	1746.6654	kWh
10/1/2024	10/31/2024	771.1822	kWh

2
3

4 The Property Management portal has also aided maintenance needs, as the portal allows us
5 to assess energy consumption at all our enrolled rental units, identifying outliers where
6 HVAC systems or other electric appliances may need repairs or replacement.

7 **V. CONCLUSION**

8 **Q: Please summarize your recommendations regarding the PMP and BEEP.**

9 A: On the whole, I find the Ameren Missouri Property Management portal and BEEP website
10 to be extremely useful and would suggest that other utilities follow their example by
11 creating similar websites. I recommend the Commission to allow Ameren Missouri to
12 continue to provide property owners with access to individual meters, with account holder
13 consent, for benchmarking purposes and access to 12-month average costs for individual
14 meters, with account holder consent to provide potential tenants with approximate utility
15 costs. I've also attached, as Schedule DG-R-2, my comments from the recent Commission

1 Rulemaking on Customer Information, File OX-2025-0106, In the Matter of the
2 Commission’s Proposed Rule 20 CSR 4240-10.175 Relating to Customer Information of
3 Electrical Corporations, Gas Corporations, Heating Companies, Certain Water
4 Corporations and Certain Sewer Corporations. I hope that my comments and presentations
5 from that docket will show the need for the PMP and BEEP in ensuring transparency for
6 renters around the total costs and affordability of housing.

7 **Q: Does this conclude your rebuttal testimony?**

8 A: Yes.

9