

Exhibit No.:
Issue(s): *Low Income Programs*
Witness: *Amy L. Eichholz*
Sponsoring Party: *MoPSC Staff*
Type of Exhibit: *Rebuttal Testimony*
Case No.: *ER-2024-0319*
Date Testimony Prepared: *January 17, 2025*

MISSOURI PUBLIC SERVICE COMMISSION

INDUSTRY ANALYSIS DIVISION

ENERGY RESOURCES DEPARTMENT

REBUTTAL TESTIMONY

OF

AMY L. EICHHOLZ

**UNION ELECTRIC COMPANY,
d/b/a Ameren Missouri**

CASE NO. ER-2024-0319

Jefferson City, Missouri
January 2025

1 **LOW-INCOME COMMUNITY SOLAR PROGRAM**

2 Q. Briefly describe Renew Missouri witness James Owen’s recommendations for
3 the Low-income Community Solar Program.

4 A. In his testimony Mr. Owen talks about the funding opportunities available
5 through the Inflation Reduction Act (“IRA”) to improve low-income community solar program
6 offerings. There are three IRA pathways that could provide funds for Ameren Missouri to use
7 toward creating a low-income solar program offering for income-qualified customers.

- 8 1. One pathway is Solar For All that is being administered for Missouri by the
9 Environmental Improvement Energy Resources Authority (“EIERA”). Based on
10 EIERA’s program the forgivable loan terms are structured to ensure 20%
11 or greater energy savings are passed onto each community solar participant.
12 EIERA recommends each utility allow participants to enroll in the shared solar
13 system up to 100% offset of their electricity.
- 14 2. The second pathway is available through the direct pay tax credits and to
15 specifically look at the low-income provisions of the investment tax credit
16 (“ITC”) or production tax credit (“PTC”) for solar projects.
- 17 3. The third pathway would be Department of Energy (“DOE”)’s Clean Energy
18 Connector pilot program. The Low-Income Home Energy Assistance Program
19 (“LIHEAP”) Community Solar Program Coordination through DOE Clean
20 Energy Connector program still contains a pilot phase which remains open
21 through 2025 for interested states. This is designed to address barriers to
22 community solar adoption by income-qualified households to enable equitable
23 access to community solar.

1 Of the three options, DOE’s pilot would take more effort and would require broad
2 collaboration among state agencies and the Company. Therefore, Renew Missouri requests the
3 Commission to require Ameren Missouri to evaluate how available funding through the
4 ITC/PTC and Solar For All program can be used to launch an energy saving low-income
5 community solar offering to customers prior to the expiration of Solar For All in 2029,
6 and propose in either its next rate case or next community solar expansion, a pilot low-income
7 community solar program.

8 Q. Does Staff support Renew Missouri’s recommendation regarding a pilot low-
9 income community solar program offering by Ameren Missouri?

10 A. It is Staff’s understanding that Renew Missouri is not recommending
11 Ameren Missouri implement a low-income community solar program in this current general
12 rate case, but is recommending Ameren Missouri evaluate funding sources and propose a
13 low-income community solar program in either its next general rate case or its next community
14 solar expansion. However, if the Commission is interested in the possibility of a program such
15 as this to be offered to customers, then Staff would recommend that the program be developed
16 and submitted through a separate certificate of convenience and necessity (“CCN”) or tariff
17 filing in order to establish the program. This would allow all parties more time to review and
18 analyze the proposed asset to serve the customers, the proposed tariff rates, program terms and
19 conditions as well as have the ability to propose tariff modifications.

20 Q. Briefly describe Consumer Council witness Jacqueline A. Hutchinson’s
21 recommendations for the Low-income Community Solar Program.

22 A. In the testimony of Ms. Hutchinson, she expressed that “[p]riority should be
23 given in any low-income solar subscription program to current Keeping Current/Keeping Cool

1 participants” and that “Consumer council recommends that Ameren Missouri develop a pilot
2 program to create community solar projects in low-income communities that have high energy
3 burden.”¹ She also states, “[l]ow-income community solar projects can be a part of the solution
4 to reduce the high energy burdens concentrated throughout many areas of Missouri.”
5 Ms. Hutchinson further states, “[p]articipating in a community solar project, should save
6 low-income households at least 20% on their utility bills based on federal
7 “Solar For All guidelines.”²

8 Q. Does Staff support Consumer Council’s recommendation regarding a community
9 solar project for low-income communities?

10 A. As previously stated in response to Renew Missouri, Staff would recommend
11 that the program be developed and submitted through a separate certificate of convenience and
12 necessity (“CCN”) or tariff filing in order to establish the program.

13 Q. What has Staff’s general position been with regard to the
14 Community Solar programs?

15 A. The Community Solar program was initially introduced many years ago. It is a
16 voluntary subscriber-based program for which a specific solar generating asset is built or
17 procured by Ameren Missouri for customers who are unable to install solar panels themselves
18 to have their electricity usage “sourced” from renewable generation. This program has a
19 separate and distinct tariff from base electric rates. It has been Staff’s position that, due to the
20 fact that this program is voluntary with separate and distinct rates from that of other base
21 customer rates, if the investment, expense and revenue from this program’s phases are to be

¹ Direct testimony of Jacqueline A. Hutchinson, page 7, lines 3-8

² Direct testimony of Jacqueline A. Hutchinson, page 6, lines 19-22

1 included in base rates with all other cost of service items, then the revenue must be sufficient
2 to cover the costs of the program. If the revenues do not cover the costs of the program then
3 non-subscribers are involuntarily subsidizing participating customers and Staff would propose
4 an adjustment during a general rate case proceeding to prevent subsidization.

5 **KEEPING CURRENT/KEEPING COOL PROGRAMS**

6 Q. What is Ms. Hutchinson’s proposal for the Keeping Current/Keeping
7 Cool Programs?

8 A. Ms. Hutchinson recommends the following for the Keeping Current/Keeping
9 Cool program:

- 10 • To increase the funding to at least \$6 million annually for adequate
11 administrative costs.
- 12 • To continue to share total costs 50/50 between the utility shareholders
13 and ratepayers.
- 14 • To increase the Federal Poverty Level (“FPL”) from 200% to 300% for
15 the elderly and raise from 200% to 250% for all other households.
- 16 • To perform a third-party evaluation of the program since one has not
17 been performed since 2019. This is a study to help improve retention of
18 participants until their completion of the program to assess the
19 effectiveness of current customer communication and to evaluate the
20 costs of the program.

1 Q. Does Staff support Ms. Hutchinson’s recommendations for the Keeping
2 Current/Keeping Cool program?

3 A. Staff supports the continued 50/50 sharing of costs and does not oppose a
4 third-party evaluation of the program. However, Staff opposes an increase to annual funding
5 and the FPL.

6 On June 14, 2023, the Commission issued its *Report and Order* in Case No.
7 ER-2022-0337 approving a *Stipulation and Agreement* (“Stipulation”) commemorating an
8 agreement between the signatories in that case. In that case, the Keeping Current and Keeping
9 Cool budget was increased to \$4.25 million. Also, in the Stipulation, the Keeping Cool amount
10 seniors receive was increased to \$50 and the compensation for Keeping Current agencies was
11 increased to \$50 for each enrollment in the program.

12 Ms. Hutchinson provides recent poverty and energy burden statistics in Missouri, but
13 does not provide support for the need to increase annual funding or the FPL for the program,
14 especially given that the current annual funding and FPL for the program was approved by the
15 Commission only 18 months ago.

16 200% FPL is consistent with the federally funded assistance provided by LIHEAP,
17 which uses a 200% FPL. Further, in an August 12, 2024, third quarter Keeping Current
18 collaborative meeting, Ameren Missouri provided that only 1% of Keeping Current enrollments
19 for 2022 through the third quarter of 2024 were for those at an FPL of 201% - 300%.

20 In that same third quarter Keeping Current collaborative meeting, Ameren Missouri
21 further provided that of the \$7.4 million Keeping Current budget for 2024
22 (through August 7, 2024), only \$2.4 million had actually been spent (through August 3, 2024).
23 Since the current annual budget for the Keeping Current program is \$4.25 million with the

1 ability to rollover unused budget to the subsequent year, this illustrates that there continues to
2 be a significant amount of annual remaining budget being rolled over to the subsequent year,
3 allowing for over \$3 million in excess of the current annual budget as of August, 2024.

4 **CRITICAL MEDICAL NEEDS PROJECT**

5 Q. What recommendations does Ms. Hutchinson make regarding the Critical
6 Medical Needs Program and Medical Registry Program?

7 A. Ms. Hutchinson is recommending the following for the Critical Medical Needs
8 and Medical Registry Programs:

- 9 • Efforts should be made to integrate the Critical Medical Needs program
10 and the Medical Registry program in that both programs would benefit
11 joint processes for enrollment and coordination of the collaborative that
12 currently exists.
- 13 • Additional agencies, medical social workers, and medical professionals
14 should be added to the provider list to increase access to both programs.
- 15 • Transparency on the cost of implementing the Critical Medical Needs
16 registry and a review of the most cost-effective methods to implement
17 this program should be discussed with all collaborative members.
- 18 • No increase in administrative costs or staffing should be allowed until
19 the collaborative has been provided information showing any increase is
20 necessary based on enrollment.³

³ Direct testimony of Jacqueline A. Hutchinson, page 5 lines page 27-30, and page 6 lines 1-9

Rebuttal Testimony of
Amy L. Eichholz

1 Q. Does Staff support Consumers Council’s recommendations to the Critical
2 Medical Needs and Medical Registry Programs?

3 A. Staff does not oppose Consumers Council’s recommendations for the Critical
4 Medical Needs and Medical Registry Programs since Consumers Council’s recommendations
5 should increase enrollment and access to the programs.

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 Union Electric Company)
d/b/a Ameren Missouri's Tariffs to Adjust) Case No. ER-2024-0319
Its Revenues for Electric Service)

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.

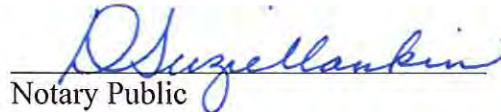
Further the Affiant sayeth not.


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 15th day of January 2025.

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.

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	Evergny Metro Inc. & Evergny Metro West	Low-Income	Testimony
ER-2024-0319	Union Electric Company d/b/a Ameren Missouri	Low-Income	Rebuttal