

Exhibit No.:
Issue(s): Programs to address low
Income issues
Witness: Page Selby
Type of Exhibit: Rebuttal Testimony
Sponsoring Party: Union Electric Company
File No.: ER-2024-0319
Date Testimony Prepared: January 17, 2025

MISSOURI PUBLIC SERVICE COMMISSION

FILE NO. ER-2024-0319

REBUTTAL TESTIMONY

OF

PAGE SELBY

ON

BEHALF OF

UNION ELECTRIC COMPANY

D/B/A AMEREN MISSOURI

**St. Louis, Missouri
January, 2025**

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REBUTTAL TESTIMONY

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1 **I. INTRODUCTION**

2 **Q. Please state your name and business address.**

3 A. My name is Page Selby. My business address is One Ameren Plaza, 1901
4 Chouteau Ave., St. Louis, Missouri.

5 **Q. What is your position with Ameren Missouri?**

6 A. My employer is Ameren Missouri, and I am the Manager of Customer
7 Advocacy in the Customer Advocacy and Energy Assistance Department.

8 **Q. Please describe your educational background and employment
9 experience.**

10 A. I have a BA degree in Economics and Business Administration from Illinois
11 College. I also earned a Chancellor's Certificate in Economic Development from
12 University of Missouri-St. Louis. I have 33 years of experience in customer service,
13 marketing, and change management. Prior to joining Ameren, I was the Vice President of
14 Marketing and Training for Mercantile Bank of IL, and owner of two small businesses. I
15 joined Ameren Missouri's Business and Community Development team ten years ago. I
16 have been in my current position since 2021, and I am responsible for the ongoing
17 development, planning, management and communication of Ameren Missouri's customer
18 advocacy strategy, including programs, outreach, budget oversight and relationships with
19 community agencies.

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II. PURPOSE OF TESTIMONY

Q. What is the purpose of your rebuttal testimony?

A. The purpose of my rebuttal testimony is to respond to the direct testimony of Office of the Public Counsel (“OPC”) witness Geoff Marke and Consumers Council of Missouri (“CCM”) witness Jackie Hutchinson. Both witnesses provided recommendations for changes to Ameren Missouri’s low-income programs that are designed to assist customers who are of limited financial status. While I do not recommend that all of the recommended changes be approved, I do appreciate the spirit with which I know these recommendations were made – to better assist Ameren Missouri customers. I would also note that many of the recommendations are consistent with, and may stem from, a survey that Ameren Missouri undertook in 2024 to determine what is and is not working with its efforts in this area.

III. RECOMMENDATIONS OF OPC WITNESS DR. MARKE

Q. Do you support Dr. Marke’s testimony that the LIWAP program should be increased to \$2 million in total under the agreed-to 50/50 sharing ratio between ratepayers and the Company?

A. Ameren Missouri does not support increasing funds at this time. Ameren Missouri alone cannot solve every need, and the Company does not believe it is appropriate to treat rates as an unlimited source of funds that can solve these problems.

The Company attempts to use the current level of funding wisely. Ameren Missouri works closely with the Community Action Agencies that administer the Low-Income Weatherization Assistance Program (LIWAP) and, working with the collaborative, makes changes in the programs to better address community needs.

1 **Q. Do you support Dr. Marke’s recommendation to reduce the length of**
2 **the Keeping Current program from 24 months to 12 months?**

3 A. Yes, I believe this recommendation is appropriate. In focus groups with
4 Keeping Current customers held earlier this year, we heard that budget billing adjustment
5 increases at 12 months often cause customers to drop from the program because they’re
6 unable to pay the adjusted budget billing amount. Re-enrolling in the program after 12
7 months would allow any arrearages to be rolled back into the program arrearage
8 forgiveness, thus keeping customer payments affordable. However, this will require more
9 work by Ameren Missouri and by Community Action Agency staff to handle re-
10 enrollments at 12 months rather than 24 months.

11 **Q. Do you support Dr. Marke’s recommendation to reduce agency**
12 **incentives for enrollment from \$50 to \$25 to recognize the change from a 2-year to a**
13 **1-year program?**

14 A. Yes. Currently, the incentives are \$50 for the 2-year program, so it makes
15 sense to reduce the incentive to \$25 per year. The intention is for agencies to be
16 compensated for their time enrolling customers.

17 **Q. Do you support Dr. Marke’s recommendation to place a greater**
18 **emphasis on formalizing the requirements to bundle programs such as LIHEAP,**
19 **LIWAP, Auto Pay and Alerts for participating customers?**

20 A. Ameren Missouri already emphasizes bundling programs with Keeping
21 Current by including a check box on the United Way enrollment platform that agencies
22 use. This requires the agencies to verify potential referral to Low Income Home Energy
23 Assistance Program (LIHEAP) and LIWAP. Adding a check box for Autopay and Alerts

1 would be beneficial, but Ameren Missouri is concerned about ensuring customer consent
2 for these actions.

3 **Q. Do you support Dr. Marke’s testimony that Ameren Missouri be**
4 **directed to create a video commercial on its website as well as how-to video tutorial**
5 **of the application process?**

6 A. I support the continued marketing and education around the program,
7 although the channel that we use should be one that we know is most effective. Consistent
8 with this objective, Ameren Missouri is changing its focus for 2025 from assisting with
9 application completion to energy education. While there are multiple ways that education
10 can occur, I am not sure that a video is the best solution. Ameren Missouri currently offers
11 video webinars available on You Tube as well as live webinars offered three times monthly.
12 These have yielded very little engagement. In addition, Ameren Missouri has seen less
13 traffic to the Energy Assistance website pages in 2024, as compared to 2023. On the
14 website, “View My Options” is the most clicked piece of content, and customers are most
15 interested in discovering the programs for which they’re eligible. Ameren Missouri prefers
16 to continue focusing its efforts on reaching customers through the channels they prefer,
17 including social media.

18 **Q. Do you support Dr. Marke’s testimony that Keeping Current**
19 **customers should be allowed to miss no more than two payments before being**
20 **removed from the program?**

21 A. Yes, I support this recommendation.

1 **Q. Do you support Dr. Marke’s testimony to expand the tariff for New**
2 **Start Energy Relief to include domestic violence shelters and utilization of the St.**
3 **Louis Housing Authority (or similar organization) to focus on seniors who are past**
4 **due and threatened with losing public housing?**

5 A. Yes, this expansion in eligibility is consistent with the spirit of the program
6 and would be an improvement based on customer needs. Affordable housing continues to
7 be a real challenge for some customers. Ameren Missouri is already working to promote
8 the program with community stakeholders including landlord and veterans’ organizations,
9 as well as working quarterly with agencies to understand program challenges.

10 **Q. Do you support Dr. Marke’s testimony suggesting changes to the**
11 **Critical Medical Needs Program (“CMNP”) including (a) CMNP funds as first bill**
12 **assistance dollars utilized (up to \$200), (b) increased investment in software**
13 **technology for screening applicants and (c) increase staffing to three individuals**
14 **handling CMNP at United Way – St. Louis.**

15 A. I am intrigued by this recommendation but do not feel I have enough data
16 to fully support the recommended changes to this program. I support the recommendation
17 to allow CMNP to access program funds as the first dollars but need to review United
18 Way’s data on average amount requested per customer in order to determine if a cap of
19 \$200 or a sliding amount would be beneficial to more customers while not exceeding the
20 budget, with the expectation that United Way will continue to make referrals for other
21 program dollars to satisfy customer needs. Regarding (b) and (c), there is a need to better
22 understand from the United Way the costs and benefits for the increased investments.

1 **Q. Do you support Dr. Marke’s testimony that \$100,000 be allocated for a**
2 **statewide third-party evaluation of the Critical Medical Needs program?**

3 A. Yes. Ameren Missouri has already agreed to take the lead developing a
4 contract and a memorandum of understanding with participating utilities in the first quarter
5 of 2025.

6 **IV. RECOMMENDATION OF CCM WITNESS MS. HUTCHINSON**

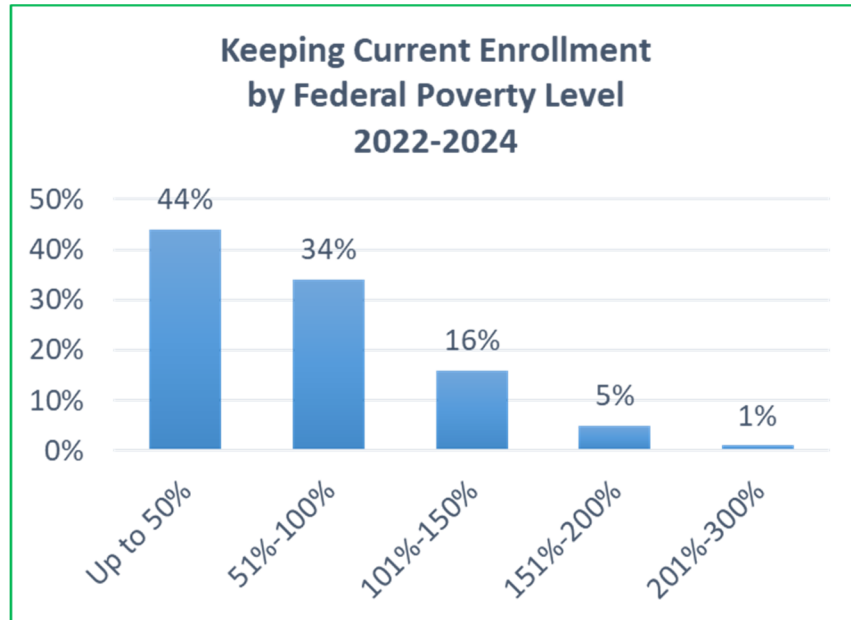
7 **Q. Do you support Ms. Hutchinson’s testimony to increase Keeping**
8 **Current program funding to \$6 million annually?**

9 A. No. Ameren Missouri utilized the entire \$4.25 million budget this year for
10 the first time in twelve years and continues to have a budget surplus from previous years
11 of approximately \$2 million. I do not believe an increase in funding is appropriate at this
12 time.

13 **Q. Do you support Ms. Hutchinson’s testimony to increase Keeping**
14 **Current eligibility to 300% for the elderly, and 250% for all other households?**

15 A. No. Ameren Missouri increased the eligibility to 300% for all households
16 in 2022 but did not see an increase in enrollments. Figure 1 below illustrates customer
17 enrollments from 2022-2024. The chart shows that most customers enrolled in the program
18 are less than 50% Federal Poverty Level (FPL), with 94% less than 150% FPL. Interest in
19 this program from customers with 200%-300% FPL eligibility was minimal.

1 Figure 1



2 **Q. Do you support Ms. Hutchinson’s testimony to engage a third-party**
3 **evaluation of the program?**

4 A. While third-party evaluations are important, I don’t believe now is the best
5 time to spend money on that type of review. Ameren Missouri conducted four focus groups
6 this year, including with agency personnel, and current and former Keeping Current
7 program participants. This research was performed by Ameren Missouri with a budget of
8 \$3,000, which was used to provide a \$50 stipend for customer participants and food for
9 each session. Most of the recommendations in Dr. Marke’s testimony resulted from the
10 customer focus group feedback. Because Ameren Missouri gained valuable program
11 insights in this cost-effective method, and because the Company plans to implement many
12 of the recommendations in 2025, I do not support an additional third-party evaluation at
13 this time (especially as the last program evaluation cost exceeded \$100,000).

1 **Q. Do you support Ms. Hutchinson’s testimony regarding the Critical**
2 **Medical Needs Program (“CMNP”) to (a) integrate the program with the Medical**
3 **Registry program, (b) add medical social workers to the provider list, (c) discuss**
4 **transparency of cost implementation, (d) no increase in administrative costs or**
5 **staffing allowed until collaborative has been provided information show any increase**
6 **is necessary, based on increased enrollment.**

7 A. I agree with recommendation (a), in general, in that a study of the
8 integration of Ameren Missouri’s Medical Hardship and Medical Equipment Registry
9 programs with the CMNP in order to simplify the programs for customers and agencies is
10 important. That said, I do not believe that an outside study is necessary as Ameren Missouri
11 is already engaging in a review of all three program benefits and eligibility requirements
12 and expects to have recommendations in 2025. The Company will provide these results to
13 the stakeholder group and discuss potential improvements and changes that may be
14 suggested by those results. Regarding recommendation (b), I support the collaborative’s
15 decision that licensed medical providers are qualified to determine eligibility for benefits
16 provided by the CMNP. I support recommendation (c) transparency of cost implementation
17 and recommendation (d), a thorough review of program costs before allocating additional
18 funds for staffing or administrative costs. I do not believe any of these recommendations
19 require a tariff change and that all can be implemented using the stakeholder process that
20 has been so effective to date.

21 **Q. Does that conclude your rebuttal testimony?**

22 A. Yes

