

<b>Exhibit No.:</b>	
<b>Issue(s):</b>	<b>Weatherization and Energy Efficiency</b>
	<b>Bill Assistance Programs and Spire Missouri Income Eligible Program</b>
<b>Witness:</b>	<b>Shaylyn Dean</b>
<b>Type of Exhibit:</b>	<b>Rebuttal Testimony</b>
<b>Sponsoring Party:</b>	<b>Spire Missouri Inc.</b>
<b>Case Nos.</b>	<b>GR-2025-0107</b>
<b>Date Prepared:</b>	<b>May 30, 2025</b>

**SPIRE MISSOURI INC.**

**GR-2025-0107**

**REBUTTAL TESTIMONY**

**OF**

**SHAYLYN DEAN**

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**REBUTTAL TESTIMONY OF SHAYLYN DEAN**

**I. INTRODUCTION**

**Q. PLEASE STATE YOUR NAME AND BUSINESS ADDRESS.**

A. My name is Shaylyn Dean, and my business address is 7500 E. 35<sup>th</sup> Terrace, Kansas City, MO 64127.

**Q. ARE YOU THE SAME SHAYLYN DEAN THAT SUBMITTED DIRECT TESTIMONY IN THIS CASE?**

A. Yes, I am.

**Q. WHAT IS THE PURPOSE OF YOUR REBUTTAL TESTIMONY?**

A. The purpose of my rebuttal testimony is to address various issues and positions taken by Staff of the Missouri Public Service Commission (“Staff”) witnesses Russell Drury, Antonija Nieto, and Adam Stamp. Specifically, I address recommendations made by those witnesses relating to Spire Missouri Inc.’s (“Spire Missouri” or the “Company”) Weatherization and Energy Efficiency programs. Additionally, the purpose of my rebuttal testimony is to address various issues and positions taken by Consumer Council of Missouri (“CCM”) witness Jim Thomas and Missouri Office of Public Counsel (“OPC”) witness Geoff Marke in their Class Cost of Service Study (“COSS”) and rate design testimony. Specifically, I address recommendations made by CCM witness Thomas relating to Spire Missouri’s Payment Partner Program, Critical Medical Needs Program, Rehousing Program, and overall utility bill assistance program promotion and the Spire Missouri Income Eligible Rate OPC witness Marke introduced in his COSS and rate design testimony.

1                   **II.     WEATHERIZATION AND ENERGY EFFICIENCY**

2   **Q.     IN GENERAL, DOES STAFF OPPOSE SPIRE MISSOURI'S CURRENT**  
3       **WEATHERIZATION AND RESIDENTIAL HIGH ENERGY EFFICIENCY**  
4       **REBATE PROGRAMS?**

5   A.     No. Staff witness Drury states on page 6 of his direct testimony that:

6                 Staff does not oppose Spire Missouri's current Weatherization and  
7                 Residential High Energy Efficiency Rebate Programs. The  
8                 programs provide opportunities for low-income customers and  
9                 home owners to make improvements to their homes that can drive  
10                down energy demand and make homes safer and more comfortable  
11                to live in. They also decrease environmental impacts by improving  
12                energy conservation efforts. Staff's investigation also shows that  
13                Spire Missouri is maintaining compliance with its current tariff  
14                sheets.

15            Staff witness Drury further notes on page 3 of his testimony that "Staff is in favor of Spire  
16            Missouri's current Weatherization Program and its management."

17   **Q.     STAFF WITNESS NIETO STATES STAFF EVALUATED THE REGULATORY**  
18       **ASSET BALANCE FOR SPIRE MISSOURI'S ENERGY EFFICIENCY**  
19       **PROGRAMS AND INCLUDED THE UNAMORTIZED BALANCE IN RATE**  
20       **BASE AND USED AN ANNUALIZED AMORTIZATION IN EXPENSE BASED**  
21       **ON A TEN-YEAR PERIOD. DO YOU AGREE WITH THIS APPROACH?**

22   A.     No. Spire Missouri proposes amortizing the costs over a five-year period.

23   **Q.     WHY IS SPIRE MISSOURI PROPOSING A FIVE-YEAR AMORTIZATION**  
24       **PERIOD?**

25   A.     The growth of the energy efficiency balance has outpaced the amounts recovered through  
26            the annualized amortization amount, which has continued to be based on a ten-year amount  
27            over multiple cases. Shortening the duration of the amortization period will reduce the level

1 of rate base and prevent a larger balance from accumulating. Spire Witness Bouselli also  
2 goes into detail about the necessity of using a five year period.

3 **Q. MS. NIETO FURTHER STATES STAFF WILL REVIEW BOTH THE**  
4 **UNAMORTIZED BALANCE AND ANNUAL AMORTIZATION THROUGH THE**  
5 **TRUE-UP CUTOFF IN THIS RATE CASE, MAY 31, 2025, FOR SPIRE**  
6 **MISSOURI'S ENERGY EFFICIENCY PROGRAMS. HOW DO YOU RESPOND**  
7 **TO THAT STATEMENT?**

8 A. Spire Missouri does not agree with the unamortized balance and amortization balance Staff  
9 is using. Therefore, Spire Missouri agrees that these amounts should be updated at true-  
10 up.

11 **Q. STAFF WITNESS NIETO RECOMMENDS ANY AMOUNTS OVER-**  
12 **COLLECTED BY SPIRE MISSOURI FOR THE ONE-TIME ENERGY**  
13 **AFFORDABILITY PROGRAM (SPIRE MISSOURI WEST ONLY) BE TRACKED**  
14 **IN THE NEXT RATE CASE. HOW DO YOU RESPOND?**

15 A. I disagree with this recommendation. This balance is expected to be fully amortized in  
16 August 2025. Accordingly, due to the minimal balance that will be reflected in rates in this  
17 case, Spire Missouri believes this balance should continue to be amortized to zero and not  
18 be included in rates moving forward.

19 **Q. IN RELATION TO RED TAG PROGRAM COSTS, STAFF WITNESS NIETO**  
20 **RECOMMENDS AN ANNUAL AMORTIZATION BASED ON THE THREE-**  
21 **YEAR PERIOD WITH NO RATE BASE TREATMENT. DO YOU AGREE WITH**  
22 **THAT APPROACH?**

1 A. Yes. Spire Missouri is in agreement with this approach and used this methodology in its  
2 direct filing. In addition, I would note that the Red Tag Program balances will be updated  
3 for true-up.

4 **Q. IN RELATION TO THE PAYS PROGRAM, STAFF WITNESS NIETO STATES**  
5 **THAT IN ITS DIRECT FILING, STAFF INCLUDED IN RATE BASE AN**  
6 **UNAMORTIZED PROGRAM BALANCE AND MADE AN ADJUSTMENT TO**  
7 **THE AMORTIZATION EXPENSE PROPOSED BY SPIRE MISSOURI. DO YOU**  
8 **AGREE WITH STAFF’S ADJUSTMENT?**

9 A. Yes. Spire Missouri agrees with this approach.

10 **Q. MS. NIETO STATES STAFF WILL REVIEW BOTH THE UNAMORTIZED**  
11 **BALANCE AND ANNUAL AMORTIZATION THROUGH THE TRUE-UP**  
12 **CUTOFF IN THIS RATE CASE, MAY 31, 2025. HOW DO YOU RESPOND TO**  
13 **STAFF’S APPROACH?**

14 A. Spire Missouri agrees with this approach and used this methodology in its direct filing. The  
15 PAYS Program balances will be updated for true-up.

16 **Q. STAFF WITNESS STAMP STATES THAT SPIRE MISSOURI SHOULD**  
17 **CONDUCT A SURVEY OF CUSTOMERS USING THE RED TAG REPAIR**  
18 **PROGRAM AND ON-BILL FINANCING PROGRAMS TO DETERMINE IF ANY**  
19 **IMPROVEMENTS ARE NECESSARY AND SUBMIT THE SURVEY RESULTS**  
20 **WITH ITS NEXT RATE CASE FILING. HOW DO YOU RESPOND?**

21 A. Spire Missouri is willing to accept Staff’s proposal. Notably, Staff witness Stamp states on  
22 page 6 of his testimony that, outside of the recommended survey requested by Staff, “Staff  
23 has no objection to the continuance of the programs, and based on its review Staff does not

1 have proposals to change how the programs have been implemented.” In addition, Staff  
2 witness Stamp indicates on pages 1 and 2 of his testimony that “Staff investigated Spire  
3 Missouri’s program designs, customers feedback, and overall performance, and has  
4 determined that Spire Missouri has properly managed and executed its energy assistance  
5 programs.” Spire Missouri appreciates Staff’s support for the programs and is willing to  
6 conduct the recommended survey.

7 **Q. STAFF WITNESS NIETO STATES STAFF REVIEWED THE ACTUAL COSTS**  
8 **OF SPIRE MISSOURI’S LOW-INCOME ENERGY AFFORDABILITY**  
9 **PROGRAM AND DEFERRAL BALANCE FOR SPIRE MISSOURI AND**  
10 **INCLUDED THE UNAMORTIZED BALANCE IN RATE BASE AND ANNUAL**  
11 **AMORTIZATION BASED ON A THREE-YEAR PERIOD. HOW DO YOU**  
12 **RESPOND TO STAFF’S APPROACH TO ITS REVIEW OF THE LOW-INCOME**  
13 **ENERGY PROGRAM COSTS?**

14 **A.** Spire Missouri agrees with this approach and used this methodology in its direct filing. The  
15 Low-Income Energy Affordability Program balances will be updated through the true-up.

### 16 **III. BILL ASSISTANCE PROGRAMS**

17 **Q. REGARDING THE PAYMENT PARTNER PROGRAM, CCM WITNESS**  
18 **THOMAS RECOMMENDS THAT A CLEAR AND SYSTEMATIC PROCESS**  
19 **SHOULD BE DEVELOPED FOR ESTABLISHING NEED, ANNUAL**  
20 **BUDGETING, ANNUAL TARGETS OF CUSTOMERS SERVED, AND ANNUAL**  
21 **ACHIEVEMENT OF TARGETS FOR THIS ONGOING PROGRAM. MR.**  
22 **THOMAS ARGUES SUCH INFORMATION SHOULD BE REPORTABLE TO**  
23 **STAKEHOLDERS AND PARTNER AGENCIES, IN ORDER TO PROMOTE THE**

**COLLABORATIVE OVERVIEW OF THIS PROGRAM. HOW DO YOU  
RESPOND TO THESE RECOMMENDED REPORTING REQUIREMENTS FOR  
THE PAYMENT PARTNER PROGRAM?**

A. Spire Missouri is open to working with CCM and all other Collaborative members to improve the process of accessing customer needs and to establish annual targets for tracking progress. A strong collaborative framework already exists through quarterly meetings that allow members to provide real-time feedback on the program.

**Q. CCM WITNESS THOMAS RECOMMENDS THE COMPANY PROVIDE  
FUNDING FOR THE PAYMENT PARTNER PROGRAM AT AN ADEQUATE  
LEVEL TO MEET THE IDENTIFIED NEEDS AND ACHIEVEMENT TARGETS,  
ARGUING THAT SPIRE MISSOURI'S PAYMENT PARTNER PROGRAM IS  
INADEQUATE TO MEET THE CURRENT NEED AND ANTICIPATED FUTURE  
NEED. HOW DO YOU RESPOND?**

A. The current budgeted funding amount is \$3.3 million per year, as described in the tariff. In previous years, the overwhelming primary mode of enrollment in the Payment Partner Program has been through auto-enrollment when a customer receives an Energy Crisis Intervention Program ("ECIP") pledge on their account. This is an acknowledgement that customers receiving ECIP need additional assistance outside of just Low-Income Home Energy Assistance Program ("LIHEAP") funds to help with their overdue balances. At the recommendation of the Collaborative, Spire Missouri has begun the process of engaging local community groups to do more manual enrollments. Once Spire Missouri has had a full year of manual program enrollment, the Company will be able to better analyze if funding levels are adequate.



1 **Q. CCM WITNESS THOMAS POINTS OUT THAT BETWEEN APRIL 2023 AND**  
2 **JUNE 2024, SPIRE MISSOURI ASSISTED ONLY 96 CUSTOMERS THROUGH**  
3 **THE CRITICAL MEDICAL NEEDS PROGRAM, AND ARGUES THAT THE**  
4 **PROGRAM IS UNDERUTILIZED AND THAT SPIRE MISSOURI SHOULD BE**  
5 **ORDERED TO SEEK BETTER METHODS OF REACHING CUSTOMERS WHO**  
6 **ARE FACING A SERIOUS MEDICAL ILLNESS OR HEALTH CONDITION.**  
7 **HOW DO YOU RESPOND?**

8 A. I disagree. Spire Missouri, along with other utilities (Ameren, Evergy, and American  
9 Water) partner with United Way to administer this program. The number of customers  
10 receiving assistance has increased from the number provided by CCM witness Thomas in  
11 his direct COSS and rate design testimony. Spire Missouri has assisted 384 customers  
12 statewide and plans to continue working with United Way as well as collaborative members  
13 to reach additional customers.

14 **Q. CCM WITNESS THOMAS RECOMMENDS THE COMMISSION ORDER SPIRE**  
15 **MISSOURI TO INCREASE THE FUNDS AND SERVICES FOR HOMELESS**  
16 **INDIVIDUALS SEEKING TO MOVE INTO HOUSING OR THOSE AT RISK OF**  
17 **HOMELESSNESS. HOW DO YOU RESPOND?**

18 A. Spire Missouri is open to discussions about increasing the funds and services available for  
19 homeless individuals or those at risk of homelessness but needs to establish clear  
20 parameters with its collaborative members prior to any funding-level conversations.  
21 According to Spire Missouri Tariff Sheet No. R-31.2, "Special provisions necessary for  
22 customers being re-housed should be discussed and included." While Spire Missouri is not  
23 a social services agency and does not specialize in addressing homelessness, the Company

1 is committed to finding effective ways to serve as a resource for our customers who need  
2 some assistance.

3 **Q. CCM WITNESS THOMAS RECOMMENDS SPIRE MISSOURI ADD**  
4 **ADDITIONAL PARTNER AGENCIES THROUGHOUT THEIR SERVICE AREA**  
5 **TO GAIN THE NECESSARY EVALUATIVE DATA FOR ITS REHOUSING**  
6 **PROGRAM. HOW DO YOU RESPOND?**

7 A. Once clear parameters have been established with the collaborative members regarding  
8 Spire Missouri's role in rehousing, the Company will be open to discussing the best  
9 strategic partnerships across our footprint. As mentioned in my previous answer, Spire  
10 Missouri is not a social services agency and understands that rehousing and homelessness  
11 are significant regional challenges caused by a variety of factors.

12 **Q. CCM WITNESS THOMAS RECOMMENDS SPIRE MISSOURI TARGET**  
13 **SPECIFIC RESOURCES AND PROGRAMS TO EDUCATE CUSTOMERS**  
14 **ABOUT THE AVAILABILITY AND SERVICES OF THEIR LOW-INCOME**  
15 **CUSTOMER ASSISTANCE PROGRAMS, AND ASSERTS THAT THIS**  
16 **MARKETING SHOULD FOCUS ON HIGH ENERGY BURDEN**  
17 **NEIGHBORHOODS. HOW DO YOU RESPOND?**

18 A. Spire Missouri is already marketing our resources by utilizing our energy burden tool to  
19 target our low-income customers. In April 2024, we revamped our Payment Partner  
20 Program to use a tiered approach based on Energy Burden, so that our customers with the  
21 highest need are provided with a higher credit amount toward their bill while enrolled in  
22 the program. Previously, customers enrolled in Payment Partner programs received a static  
23 \$35 Budget credit applied monthly, regardless of bill amount or energy burden. The new

1 program allows for greater benefit to be applied to those with a more severe burden. We  
2 are currently working to develop a reporting tool so that we can provide feedback on  
3 enrollments in each energy burden classification. We have also used our energy burden  
4 tool to find additional Dollar Help partnerships and to target more utility bill assistance  
5 outreach events.

6 **Q. CCM WITNESS THOMAS RECOMMENDS SPIRE MISSOURI RECOMMIT TO**  
7 **AND INCREASE PROMOTIONS OF ITS “DOLLAR HELP” PROGRAM, IN**  
8 **LIGHT OF REDUCED FUNDING FOR GOVERNMENTAL ASSISTANCE**  
9 **PROGRAMS HELPING THOSE IN CRISIS. HOW DO YOU RESPOND?**

10 A. Spire Missouri is in agreement with recommitting our efforts with increasing promotions  
11 of the “Dollar Help” program to help our customers needing utility assistance. However,  
12 the Company needs CCM as well as other organizations to acknowledge that utilities will  
13 not be able to replace or come close to replacing all the funding budgets being discussed at  
14 the federal government budget process.

15 **IV. SPIRE MISSOURI INCOME ELIGIBLE PROGRAM**

16 **Q. HAVE YOU REVIEWED THE DIRECT TESTIMONY SUBMITTED BY OPC**  
17 **WITNESS GEOFF MARKE AND THE SPIRE MISSOURI INCOME ELIGIBLE**  
18 **RATE HE PROPOSED?**

19 A. Yes.

20 **Q. IS SPIRE MISSOURI AWARE OF SENATE BILL 4, RECENTLY SIGNED INTO**  
21 **LAW, MENTIONED BY WITNESS DR. MARKE, AND ITS LANGUAGE**  
22 **REGARDING SPECIAL RATES FOR CUSTOMERS?**

1 A. Yes. Spire Missouri is aware of the language that authorizes the Missouri Public Service  
2 Commission (“MPSC”) to tailor utility rates for seniors and low-income households.  
3 Spire Missouri looks forward to working with the MPSC and other stakeholders in any  
4 future workshops to address that section of Senate Bill 4.

5 **Q. IS SPIRE MISSOURI AGREEABLE TO THIS RATE BEING PROPOSED BY DR.**  
6 **MARKE?**

7 A. Spire Missouri is open to further discussions about this special rate being proposed by Dr.  
8 Marke if the Commission is supportive. However, Spire Missouri is also mindful of any  
9 subsidization that this type of rate schedule would create for its other customer classes. If  
10 this type of rate schedule is agreed to as part of this rate case, a cap will need to be placed  
11 on it to ensure that the dollars attributed to it are not overly burdensome on other customer  
12 classes. Besides a cap for this program, the Company would want to pilot or have an  
13 experimental tariff if there was general agreement among the parties for an income eligible  
14 rate.

15 **V. CONCLUSION**

16 **Q. DOES THIS CONCLUDE YOUR TESTIMONY?**

17 A. Yes.

In the Matter of Spire Missouri Inc. d/b/a Spire’s )  
Request for Authority to Implement a General )  
Rate Increase for Natural Gas Service Provided ) File No. GR-2025-0107  
In the Company’s Missouri Service Areas )

STATE OF MISSOURI )  
 )  
 ) SS.  
CITY OF ST LOUIS )

3. I hereby swear and affirm that my answers to the questions contained in my rebuttal testimony are true and correct to the best of my knowledge, information, and belief.

Shaylyn Dean

Subscribed and sworn to before me this 13<sup>th</sup> day of May 2025.

Linda L. Kane  
Notary Public

