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Witness:	Shaylyn Dean
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Sponsoring Party:	Spire Missouri Inc.
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SPIRE MISSOURI INC.

CASE NO. GR-2025-0107

SURREBUTTAL TESTIMONY

OF

SHAYLYN DEAN

JUNE 30, 2025

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SURREBUTTAL 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. 35th Terrace, Kansas City, MO 64127.

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

A. Yes, I submitted Direct and Rebuttal Testimony on behalf of Spire Missouri Inc. (“Spire Missouri” or “Company”) in this rate case.

Q. WHAT IS THE PURPOSE OF YOUR SURREBUTTAL TESTIMONY?

A. The purpose of my surrebuttal testimony is to respond to various issues, positions and statements made in the rebuttal testimony of the Missouri Public Service Commission Staff (“Staff”) and the Office of Public Counsel (“OPC”) which was filed with the Commission on May 30, 2025. Specifically, I will provide surrebuttal testimony responding to the following issues: the Spire Missouri Income Eligible Rate Program OPC witness Geoff Marke introduced in his Class Cost of Service Study (“COSS”) and rate design testimony, and the Company’s Weatherization and Energy Efficiency programs.

Q. ARE YOU SPONSORING ANY SCHEDULES WITH YOUR SURREBUTTAL TESTIMONY?

A. No.

II. SPIRE MISSOURI INCOME ELIGIBLE RATE PROGRAM

Q. STAFF WITNESS ROTH STATES THAT STAFF DOES NOT SUPPORT OPC WITNESS MARKE’S PROPOSAL FOR A “SPIRE INCOME ELIGIBLE RATE”

1 **AND DOES NOT BELIEVE A COMPLETE WAIVER OF THE CUSTOMER**
2 **CHARGE IS APPROPRIATE, AS IT WOULD CAUSE NON-PARTICIPATING**
3 **RATEPAYERS TO SUBSIDIZE THOSE WHO DO. HOW DO YOU RESPOND?**

4 A. Spire Missouri remains open to the income eligible rate program. However, as mentioned
5 in my rebuttal testimony, Spire Missouri is also mindful of any subsidization that this could
6 create for other customer classes. Based on Commission comments, and concerns on
7 subsidization, a cap would be needed to move this program forward.

8 **Q. STAFF WITNESS ROTH FURTHER STATES THAT, WITH THE RECENT**
9 **PASSAGE OF SENATE BILL 4 (“SB 4”), ALL LOW-INCOME PROGRAMS**
10 **WILL BE REVIEWED AND MORE UNIFORM PROGRAMS MAY COME OUT**
11 **OF THAT REVIEW. MS. ROTH OPINES THAT IT IS BETTER TO WAIT FOR**
12 **THIS REVIEW TO START ANY NEW LOW-INCOME PROGRAMS. DO YOU**
13 **AGREE?**

14 A. Yes and no. Spire Missouri is amenable to participating in workshops to ensure that the
15 programs best suited to assist our customers are in place. However, if the parties agree, the
16 Company is also open to a pilot program similar to the program proposed by Dr. Marke
17 that would incorporate a cap. This could allow the parties an opportunity to see the
18 effectiveness of the program in assisting customers.

19 **Q. STAFF WITNESS ROTH PROPOSES THAT, INSTEAD OF A 100% WAIVER OF**
20 **THE CUSTOMER CHARGE AS PROPOSED BY OPC, THE CUSTOMER**
21 **CHARGE BE REDUCED BY 75%. HOW DO YOU RESPOND TO STAFF’S**
22 **ALTERNATIVE PROPOSAL?**

1 A. The alternative proposal suggested by Staff could help funding go further if implemented,
2 allowing the program to reach more customers. This could be something to add to the pilot
3 program, if implemented.

4 **Q. STAFF WITNESS ROTH PROPOSES THAT, IF THE SPIRE MISSOURI**
5 **INCOME ELIGIBLE RATE OR AN ALTERNATIVE IS APPROVED BY THE**
6 **COMMISSION, THE REVENUE LOSS SHOULD BE ALLOCATED AMONGST**
7 **ALL CUSTOMER CLASSES, RATHER THAN ONLY THE RESIDENTIAL**
8 **CLASS, AND ESPECIALLY NOT ISOLATED TO THE RESIDENTIAL**
9 **CUSTOMER CHARGE. HOW DO YOU RESPOND?**

10 A. Spire Missouri is open to discussing the best way to handle revenue loss, but this would
11 prevent the impact of the program falling just to the residential class. There is, however,
12 the subsidization concern, which the Commission has identified as a concern with these
13 types of programs. It is also my expectation that other parties to this case will have issue
14 with spreading these costs across all classes even though all classes will not be eligible for
15 the program.

16 **Q. OPC WITNESS MARKE STATES THAT, MOVING FORWARD, OPC**
17 **RECOMMENDS THE COMMISSION MAINTAIN THE CURRENT FUNDING**
18 **LEVELS FOR EXISTING PROGRAMS AND SUPPORT THE NEW INCOME-**
19 **SPECIFIC RATE DESIGN FOR ELIGIBLE RESIDENTIAL CUSTOMERS. HOW**
20 **DO YOU RESPOND TO THESE RECOMMENDATIONS?**

21 A. Spire Missouri has no plans to reduce its current funding for existing income eligible
22 programs. The Company has a strong history of successful income eligible programs that
23 have made a significant impact on the communities we serve throughout the state. The

1 Company is not opposed to additional program funding by its customers, but Spire
2 Missouri already contributes significant dollars to its programs and has no plans to increase
3 its funding in this case.

4 **Q. OPC WITNESS MARKE RECOMMENDS THAT EACH TARIFFED PROGRAM**
5 **ALLOW FOR THE REALLOCATION OF FUNDS ACROSS PROGRAMS IF**
6 **FEDERAL FUNDING FOR LOCAL COMMUNITY ACTION AGENCIES**
7 **(“CAAs”) AND/OR THE PROGRAMS THAT THEY ADMINISTER, SUCH AS**
8 **THE LOW INCOME HOME ENERGY ASSISTANCE PROGRAM (“LIHEAP”)**
9 **SHOULD CEASE. HOW DO YOU RESPOND?**

10 A. Spire Missouri agrees that flexibility in reallocating funds may be beneficial, regardless of
11 whether federal funding ceases. This will allow funding to shift to the programs that are
12 the most successful in helping our customers, rather than going to administrative costs.

13 **Q. OPC WITNESS MARKE STATES THERE IS NOT CURRENTLY A**
14 **CONTINGENCY PLAN IN PLACE IF THE CAAs CEASE TO EXIST. HE STATES**
15 **HE IS CURRENTLY IN THE PROCESS OF ARRANGING CONTINGENCY**
16 **PLAN DISCUSSIONS. HOW DO YOU RESPOND?**

17 A. Based on the conversations the Company has had with the CAAs, I agree that most of these
18 agencies may not have a proper contingency plan in place to address the potential federal
19 funding cuts being discussed. If some CAAs cease their operations, Spire Missouri will
20 still ensure its low-income assistance funding reaches those in need.

21 **III. WEATHERIZATION AND ENERGY EFFICIENCY**

22 **Q. STAFF WITNESS DRURY STATES STAFF LARGELY SUPPORTS THE CO-**
23 **DELIVERY PROGRAMS BETWEEN SPIRE MISSOURI, AMEREN, EVERGY,**

1 **AND INDEPENDENCE POWER AND LIGHT, EXCLUDING THE THREE (3)**
2 **LOW INCOME PROGRAM INCENTIVES WHICH SCORED BELOW THE**
3 **DESIRED 1.00 SCORE ON A TOTAL RESOURCE COST TEST (“TRC”). MR.**
4 **DRURY CONTENDS THE DOLLARS PROVIDED TO THESE THREE**
5 **PROGRAM INCENTIVES MAY BE OF GREATER BENEFIT IF APPLIED TO A**
6 **DIFFERENT, MORE COST-EFFECTIVE PROGRAM. HOW DO YOU**
7 **RESPOND?**

8 A. The Company disagrees with Mr. Drury’s evaluation of the program based on the TRC
9 test. These three incentives are for low-income programs co-delivered with Ameren,
10 Evers, and Independence Power and Light (IPL), and historically, low-income programs
11 have not been required to pass a cost benefit test like our other programs. I do not disagree
12 with Mr. Drury that it is an important consideration, however, it is also important to balance
13 the cost effectiveness with the policy of reducing the hardships low-income households
14 face. This is a policy reflected in the statute applicable to the electric utility energy
15 efficiency programs that we co-deliver these programs with, Section 393.1075.4, RSMo.,
16 that states “programs targeted to low-income customers or general education campaigns
17 do not need to meet a cost-effectiveness test, so long as the commission determines that
18 the program or campaign is in the public interest.” These program incentives are targeted
19 to low-income customers and should be continued.

20 **Q. DOES STAFF RECOMMEND THE COMMISSION ACCEPT SPIRE MISSOURI’S**
21 **PROPOSED CHANGES TO ITS COMMERCIAL AND INDUSTRIAL (“C AND I”)**
22 **ENERGY EFFICIENCY TARIFF?**

1 A. Yes. In his rebuttal testimony, Staff witness Drury states “Staff recommends the
2 Commission accept [the C and I Energy Efficiency Tariff] changes.”¹

3 **Q. STAFF WITNESS DRURY RECOMMENDS THE COMMISSION APPROVE THE**
4 **NATURAL GAS HEAT PUMP PILOT PROGRAM PROPOSED BY SPIRE**
5 **MISSOURI. HOW DO YOU RESPOND?**

6 A. Spire Missouri agrees and appreciates Staff’s support for the program.

7 **Q. DOES STAFF RECOMMEND THE COMMISSION ACCEPT YOUR PROPOSAL**
8 **TO ADD A SEPARATE COLUMN FOR SMART WI-FI ENABLED**
9 **THERMOSTATS FOR AN INCREASED REBATE AMOUNT OF \$75?**

10 A. Yes. Staff witness Drury states in his rebuttal testimony that “Staff recommends the
11 Commission accept the increased rebate amount for Smart Wi-Fi Enabled Thermostats.”²

12 **Q. STAFF WITNESS DRURY RECOMMENDS THE COMMISSION REJECT BOTH**
13 **POOL HEATER REBATE OPTIONS YOU PROPOSED IN YOUR DIRECT**
14 **TESTIMONY. HOW DO YOU RESPOND?**

15 A. Spire Missouri is willing to accept the proposal to not move forward with the pool heater
16 rebate proposal at this time.

17 **Q. STAFF WITNESS DRURY RECOMMENDS THE COMMISSION REJECT YOUR**
18 **PROPOSED ADDITION OF A \$200 REBATE FOR ENERGY STAR QUALIFIED**
19 **NATURAL GAS DRYERS. HOW DO YOU RESPOND?**

20 A. Spire Missouri is willing to accept the proposal to not move forward with the Energy Star
21 qualified natural gas dryers.

¹ Page 7, line 10 of Staff witness Drury’s rebuttal testimony.

² Page 2, lines 15-16 of Staff witness Drury’s rebuttal testimony.

1 **Q. DOES STAFF RECOMMEND THE COMMISSION ACCEPT YOUR PROPOSED**
2 **ADDITION OF AN INSULATION INCENTIVE OPTION FOR GREATER THAN**
3 **OR EQUAL TO R-38 AT \$0.40/SQ. FOOT UP TO \$750 MAX?**

4 A. Yes. Staff witness Drury states in his rebuttal testimony that “Staff recommends the
5 Commission accept the addition of the insulation incentive option for the greater than or
6 equal to R-38 option.”³

7 **Q. OPC WITNESS MARKE STATES OPC DOES NOT SUPPORT SPIRE**
8 **MISSOURI’S REQUESTED CHANGES TO ITS ENERGY EFFICIENCY**
9 **PROGRAM REBATES, BUT THE OPC MAY BE AMENABLE TO SUPPORTING**
10 **SPIRE MISSOURI’S REQUESTS REGARDING (1) ADDING INSULATION AS**
11 **AN INCENTIVE OPTION FOR GREATER THAN OR EQUAL TO R-38 AT**
12 **\$0.40/SQ. FOOT UP TO \$750 MAX, AND (2) ADDING A NATURAL GAS HEAT**
13 **PUMP PILOT PROGRAM. HOW DO YOU RESPOND?**

14 A. Spire Missouri has decided not to pursue the addition of the pool heater and natural gas
15 dryer Energy Efficiency rebates. The Company plans to proceed with the rollout of Wi-
16 Fi-enabled smart thermostats offering customers an incentive of \$75. The Company
17 appreciates OPC’s support for the insulation incentive and the natural gas heat pump pilot.

18 **Q. STAFF WITNESS DRURY RECOMMENDS THE COMMISSION REJECT SPIRE**
19 **MISSOURI’S REQUESTED INCREASE OF \$200,000 ANNUALLY FOR THE**
20 **WEATHERIZATION PROGRAM FOR THE SPIRE MISSOURI WEST SERVICE**
21 **TERRITORY, WHICH WOULD BRING THE TOTAL FUNDING FOR SPIRE**
22 **MISSOURI WEST UP TO THE SAME LEVEL OF FUNDING AS SPIRE**

³ Page 2, lines 20-21 of Staff witness Drury’s rebuttal testimony.

1 **MISSOURI EAST AT \$950,000 (TOTAL PROGRAM BUDGET: \$1.9 MILLION).**

2 **HOW DO YOU RESPOND?**

3 A. Spire Missouri maintains that it is appropriate to increase the budget for Spire Missouri
4 West, which has been quickly depleting the past rolled-over funding over the past couple
5 of years. Additionally, weatherization funding is another source that might face significant
6 cuts from the federal government, so the increased funding will benefit our customers.

7 **Q. DOES STAFF RECOMMEND THE COMMISSION APPROVE THE**
8 **ADDITIONAL CHANGES TO THE WEATHERIZATION PROGRAM**
9 **DESCRIBED ON PAGE 6, LINES 5-14 OF YOUR DIRECT TESTIMONY⁴?**

10 A. Yes. Staff witness Drury states in his rebuttal testimony that “Staff recommends the
11 approval of these changes. It helps clarify the role of the CAAs regarding the funding
12 provided to them by Spire Missouri.”⁵

13 **Q. IS OPC IN SUPPORT OF ANY OF YOUR OTHER RECOMMENDED CHANGES**
14 **REGARDING THE COMPANY’S WEATHERIZATION AND ENERGY**
15 **EFFICIENCY PROGRAMS?**

16 A. Yes. OPC witness Marke states in his direct testimony that OPC is in support of (1) my
17 recommended increase of \$200,000 in funding for weatherization for Spire Missouri West
18 to match the current amount for Spire Missouri East, (2) an additional \$200,000 for the
19 Company’s Red-Tag Program, and (3) for the Company’s Pay As You Save (“PAYS”)
20 Tariff to be updated to be consistent with its co-delivered electric utility tariffs.⁶

⁵ Page 9, lines 15-16 of Staff witness Drury’s rebuttal testimony.

⁶ See page 5, line 4 of OPC witness Marke’s direct testimony

1 **Q. OPC WITNESS SCHABEN RECOMMENDS A DISALLOWANCE OF**
2 **APPROXIMATELY \$2.1 MILLION FROM SPIRE MISSOURI'S ENERGY**
3 **EFFICIENCY ASSET, TO BE ALLOCATED BETWEEN SPIRE MISSOURI EAST**
4 **AND SPIRE MISSOURI WEST, TO ACCOUNT FOR INCREASED ENERGY**
5 **EFFICIENCY EXPENSES SINCE THE LAST RATE CASE. HOW DO YOU**
6 **RESPOND?**

7 A. Spire Missouri disagrees with the \$2.1 million disallowance proposed by OPC witness
8 Schaben in her rebuttal testimony. In Table 1 of her rebuttal testimony, Ms. Schaben
9 compares costs included in the Company's last rate case, Case No. GR-2022-0179, with
10 costs included in the present case. The problem with this analysis is that the costs she
11 compared from Case No. GR-2022-0179 were over a 13-month period, while the costs in
12 the present case are over a 32-month period. This results in an inaccurate observation that
13 costs skyrocketed, when the administrative expenditures, specifically advertising and
14 marketing and payroll, that Ms. Schaben specifically calls out, have not increased, but
15 actually have remained flat or decreased.

16 **Q. ARE THE COMPANY'S ENERGY EFFICIENCY COSTS REVIEWED**
17 **BETWEEN RATE CASES?**

18 A. Yes. Spire Missouri tracks its energy efficiency costs on a program year basis. Spire
19 Missouri also provides quarterly financial reporting, including budget information, to its
20 Energy Efficiency Collaborative for review, which includes both Staff and OPC.

21 **Q. HAS THE COMPANY MET WITH OPC TO EXPLAIN ITS ENERGY**
22 **EFFICIENCY COSTS AND SPENDING?**

1 A. Yes. Spire Missouri has met with OPC to review the energy efficiency expenditure reports
2 and will continue to engage with OPC to address any remaining concerns.

3 **Q. DO YOU AGREE WITH ANY OF MS. SCHABEN'S PROPOSED**
4 **ADJUSTMENTS?**

5 A. Yes. The Company appreciates where Ms. Schaben identified a limited number of
6 instances where items were charged to the energy efficiency budget incorrectly, such as for
7 alcohol at restaurants or gym memberships, and agrees that these should be removed.
8 Business meals accounts for \$2,056 and gym memberships, under "Wellness" accounts for
9 \$713, totaling a \$2,769 adjustment. However, this amount is far from the "extravagant
10 spending" that she alleges and far less than the \$2.1 million she proposed.

11 **Q. OPC WITNESS SCHABEN SUGGESTS THAT THE ENERGY EFFICIENCY**
12 **ASSET HAS BECOME A MEANS FOR ENTERTAINING EMPLOYEES AND**
13 **GAS CONTRACTORS ON THE RATEPAYER'S DIME. HOW DO YOU**
14 **RESPOND?**

15 A. Spire Missouri disagrees with OPC witness Schaben's portrayal of the Energy Efficiency
16 program for the reasons outlined above. Additionally, building strong relationships with
17 natural gas contractors is very important. This collaboration has enabled Spire Missouri to
18 work with our network of contractors to provide customers with access to millions of
19 dollars in rebate incentives. Similarly, electric utilities also have contractor networks that
20 include many of the same companies, and they offer rebates that are often much larger than
21 the incentives Spire Missouri can provide to customers.

1 Q. OPC WITNESS SCHABEN ARGUES AGAINST THE PROMOTION OF
2 NATURAL GAS HEAT PUMPS, SAYING IT REMOVES THE CHOICE FROM
3 HOMEOWNERS. HOW DO YOU RESPOND?

4 A. Ms. Schaben argues against natural gas heat pumps, even though Dr. Marke supports Spire
5 Missouri in promoting this technology. Ms. Schaben contends that electric utilities could
6 also provide rebates for heat pumps, and by allowing Spire Missouri to promote natural
7 gas heat pumps and other gas appliances removes the choice of homeowners. This
8 argument fails to recognize that electric utilities already offer the same rebates as part of
9 their energy efficiency programs and receive a return through their MEEIA program cycles.
10 Spire Missouri is working within this case to advance a natural gas heat pump pilot, aiming
11 to provide a similar incentive that is very efficient, affordable, and reliable, helping our
12 customers meet their home heating needs.

13 Q. OPC WITNESS SCHABEN STATES OPC FURTHER PROPOSES THAT SPIRE
14 MISSOURI'S POLICY OF REQUIRING DETAILED RECEIPTS ONLY FOR
15 PURCHASES OVER \$75 SHOULD BE UPDATED TO \$50 DUE TO
16 INATTENTIVE SPENDING WITHOUT ANY BENEFIT TO RATEPAYERS.
17 HOW DO YOU RESPOND?

18 A. Spire Missouri disagrees with the OPC witness Schaben's characterization of overall
19 Energy Efficiency spending. As mentioned above, the issues that Ms. Schaben identified
20 related to alcohol or gym memberships were incorrectly charged and not the result of
21 inattentive spending. The Company agrees with Ms. Schaben that these costs should not
22 be recovered, and the Company is removing them. However, this is not a widespread issue
23 across the Company that is impacting ratepayers, and the Company disagrees that the

1 corporate policy for receipt requirements should be changed. That being said, the Company
2 is open to discussions with the OPC or other parties around additional documentation
3 requirements for specific programs.

4 **IV. CONCLUSION**

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

6 **A. Yes.**

R. Andia K Spear
Notary Public