Exhibit No.:	
Issues:	Customer Charge, Low-Income Program, Billing Issues
Witness:	Jessica Polk Sentell
Sponsoring Party:	Renew Missouri Advocates
Type of Exhibit:	Rebuttal Testimony
Case No.:	ER-2024-0261
Testimony Filed:	August 18, 2025

MISSOURI PUBLIC SERVICE COMMISSION

ER-2024-0261

REBUTTAL TESTIMONY

OF

JESSICA POLK SENTELL

ON BEHALF OF

RENEW MISSOURI ADVOCATES

August 18, 2025

I. INTRODUCTION

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

A: Jessica Polk Sentell, Director of Eastern Missouri and Policy Associate, Renew Missouri Advocates d/b/a Renew Missouri ("Renew Missouri"), 501 Fay Street, Suite 206, Columbia, MO 65201.

Q: Please describe your current position, your education, and background.

A: In my role as Director of Eastern Missouri and Policy Associate at Renew Missouri, I, along with other Renew Missouri staff, have developed and offered educational materials and programs on topics related to energy law and policy in Missouri, rural renewable siting and county planning and zoning, rural broadband, local organizing and rural electric cooperative engagement, and our year-end update covering state and federal rulemakings, Public Service Commission ("PSC" or the "Commission") cases, and other various energy efficiency/renewable energy updates.

Regarding my background and education, I have a Master of Public Administration and a Bachelor of Science in Political Science, both from Missouri State University in Springfield, Missouri. I am also a certified teacher in the State of Missouri and have a certificate in Culturally Responsive Teaching from Southeast Missouri State University's Center for Teaching and Learning. Upon graduating with my master's degree, I was selected as a Presidential Management Fellow by the Office of the President of the United States, Washington, D.C. As a Presidential Management Fellow, I spent over three years working as a Program Analyst for the federal government. During my tenure, I worked for the US Department of Defense, Joint Chiefs of Staff, National Military Command Center, Pakistan-Afghanistan Coordination Cell, Office of Governance & Development; US

Department of State, Office of the Special Representative to Muslim Communities; and US Department of Justice, Drug Enforcement Administration, International Operations, Special Projects Branch. Prior to beginning my position at Renew Missouri, I spent 12 years teaching political science at Southeast Missouri State University in Cape Girardeau, Missouri, Three Rivers College in Poplar Bluff, Missouri, and Clearwater R-1 High School in Piedmont, Missouri.

Q: What work does Renew Missouri conduct in the field of energy policy?

A: Renew Missouri is an advocacy group appearing before regulatory agencies such as the Missouri Public Service Commission, the Kentucky Public Service Commission, and the Kansas Corporation Commission in the role as expert witnesses on clean energy, energy efficiency, and transmission development policy. Our work involves engaging as intervenors on utility rate cases, applications for certificates of convenience and necessity (“CCNs”), mergers and acquisitions, Accounting Authority Orders (“AAOs”), and energy efficiency investment portfolios. Renew Missouri also routinely engages in workshops and rulemaking by providing comments. We have also lent our expertise and knowledge on legislative matters in Missouri and Kansas as well as the federal level on issues ranging from energy efficiency investments to securitization of debts incurred from closing coal plants to helping rural electric cooperatives obtain financing for clean energy projects.

Q: Please summarize your professional experience in the field of utility regulation.

A: I aided with research and development of testimony in Case File No. ER-2024-0319, EA-2024-0292, and have filed testimony in File No. EO-2025-154.

Q: What is the purpose of your testimony?

A: The purpose of my testimony is on a number of topics involving Liberty ("Liberty" or the "Company") and issues that should be addressed in this case, raised by Liberty, Consumer Council of Missouri, and the Office of Public Counsel in their direct testimonies. I will make an argument against raising the customer charge and in support of expanding the low income program. I will also address Liberty's documented billing issues. The absence of discussion of other topics in this testimony should not be construed as support for, or opposition to, the Company's positions.

Q: Could you please briefly summarize your testimony as well as your recommendations?

A: I will highlight reasons the customer charge should not be raised to sixteen dollars a month and instead be addressed through a residential volumetric rate increase. Then, I will outline the benefits of expanding Liberty's low-income program to more customers with increased stipends. Finally, I will acknowledge Liberty's billing issues and recommend: 1) a continued moratorium on late fees and service termination and 2) financial compensation be recouped by harmed customers, especially net metering customers, in the appropriate investigation/case number.

II. CUSTOMER CHARGE

Q: How much is Liberty requesting as an increase to their residential fixed charge?

A: Liberty is requesting the charge be raised from thirteen to sixteen dollars a month, which is a twenty-three percent increase.[1]

Q: Does Renew Missouri support or oppose this rate increase?

[1] Tariff Revision (JE-2025-0069).

A: Renew Missouri opposes this rate increase.

Q: Please explain.

A: Renew Missouri believes an increase to the residential fixed charge will make it harder for customers to control their energy bills as they cannot adjust their energy usage and impact this charge. Thus, there is less incentive for customers to employ energy efficiency tactics to lower their bills and conserve their overall energy use. What energy efficiency tactics *are* employed will have less impact if this fixed charge is included.

Furthermore, because the charge is a set, fixed rate for all customers, it will have a greater negative impact on lower-income customers. In short, this will cause lower-income families' energy burdens to rise considerably more than other customers' energy burdens. (For an in-depth review of energy burdens, please refer to the Energy Burden Study and Geoff Marke's direct testimony.[2]) Renew Missouri does not support the fixed customer charge increase as it is a regressive charge that will specifically cause more harm to lower-income families. Please see the following tables for an example.

Table 1: Family 1

(above 60% of Missouri's State Median Income Guidelines for FY 2025 for 1-person household[3])

Monthly Bill	**Monthly Income**	**Energy Burden**
$125+13	$3000	4.6%
$125+$16	$3000	4.7%
	Increase to energy burden from $16 residential charge:	**.1%**

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[2] *Direct Testimony of Geoff Marke*, p. 3-6, *Direct Testimony of Nathaniel W. Hackney,* Direct Schedule NWH-1.

[3] https://liheapch.acf.gov/profiles/povertytables/FY2025/mosmi.htm

Family 1's monthly income is above Missouri's State Median Income Guidelines ($2,751 per month would be 60% and qualify for low-income energy assistance for a 1-person family).[4] If you compare Family 1's energy burden increase to a low-income family (Family 2, below), you will see an even greater increase in the lower-income family's energy burden.

Table 2: Family 2

(below 60% of Missouri's State Median Income Guidelines for FY 2025 for 1-person household[5])

Monthly Bill	**Monthly Income**	**Energy Burden**
$125+13	$2000	6.9%
$125+$16	$2000	7.05%
	Increase to energy burden from $16 residential charge:	**.15%**

In Table 1, there was a .1% increase in energy burden. Family 1 does not have a high energy burden (six percent is generally considered "high").[6] Family 2 has a lower monthly income but the same energy bills. They are already considered a high-energy-burden-family with an energy burden above six percent, even without the additional proposed residential fixed charge. However, their position is worsened by the charge increase; their energy burden is increased by .15%, for a 7.05% energy burden.

Q: Why is this issue important to Liberty's customers?

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[4] Id.
[5] Id.
[6] https://www.energy.gov/scep/low-income-energy-affordability-data-lead-tool
Direct Testimony of Geoff Marke, p. 3.

A: According to the study done by Empower Dataworks and discussed in Geoff Marke's testimony, Liberty's customers are already more likely to be in poverty, earn less overall, and be over 65 years old, relative to Missouri averages, meaning Liberty's customers are *already* (before any raises to fixed customer charges) at-risk for having high energy burdens.[7] This regressive policy would only worsen the situation. Regressive charges "deepen inequalities," "amplifies the gap between the rich and the poor," and entrenches "social and economic disparities."[8] If the fixed customer charge is raised, some Liberty customers may be forced to choose between food, medication, or paying their electric bill.

Q: What is your recommendation? Explain.

A: Renew Missouri would like to endorse Consumer Council of Missouri's proposal of not increasing the fixed residential charge but instead increasing the residential volumetric rate to meet the revenue requirement. Renew decided to endorse this proposal due to the demonstrated relationship between energy use and income.[9] This would result in a bill increase proportional to energy usage, instead of a regressive, fixed charge. Meeting the revenue requirement by increasing the residential volumetric rate would assuage Renew's concerns about the regressive effect of the increase.

Q: Is there anything else you'd like to add?

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[7] *Direct Testimony of Geoff Marke,* p. 4-6
https://globaltaxjustice.org/news/a-look-at-progressive-tax/#:~:text=In%20the%20end%2C%20such%20regressive,marginalized%20communities%2C%20deepening%20gender%20inequality.
https://itep.org/whopays-7th-edition/
https://uk.indeed.com/career-advice/career-development/what-is-regressive-tax#:~:text=In%20contrast%2C%20if%20the%20other,in%20a%20more%20expensive%20property.
Regressive charges operate similarly to regressive taxes, and often result in the same inequities.
[9] https://www.eia.gov/consumption/residential/data/2020/c&e/pdf/ce2.3.pdf
Direct Testimony of Caroline Palmer, p. 9.

A: Especially due to Liberty's established billing errors and faulty Customer First platform, Renew Missouri sees no need to add to customers' stress, frustrations, or ability to pay in an across-the-board fixed charge increase. Raising customer charges that cannot be impacted by energy use or efficiency during and after multiple faulty billing cycles is unjust.

III. LOW-INCOME PROGRAM

Q: Do you support changing Liberty's current Low-Income Pilot Program (LIPP)?

A: Yes, Renew supports changing Liberty's LIPP. As both Liberty and the Office of Public Council ("OPC") have testified, there are legitimate reasons to make changes.[10] In addition to changes in the Missouri Statutes, any good pilot program should evaluate and adjust policies with the intent of arriving at the best possible program. We, along with OPC and the Company, believe the time to adjust policies/LIPP is in this case.

Q: Does Liberty or Dr. Marke propose changes you'd like made to the program?

A: Yes, both suggest several important changes Renew would like to highlight and support. Collectively, these changes will expand access to the low-income program and make the program more effective for customers. The aim is that this will help alleviate customers' energy crises and reduce arrearage balances.

Q: What changes do you support?

A: The Company proposed calling their new program the "Fresh Start Plan" ("FSP"). While Renew proposes changes to their Fresh Start Plan proposal, I will use this title to refer to the new program so as not to confuse the old and new programs. First, both Liberty and OPC give reasons for using 60% of State Median Income ("SMI") as a basis for FSP

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[10] *Direct Testimony of Nathaniel W. Hackney*, p. 13-17, *Direct Testimony of Geoff Marke*, p. 7-13.

eligibility.[11] Renew supports this change as it would expand the number of households eligible to participate in the program and would also align with state-based utility assistance eligibility. Renew also supports Liberty's suggestion that the Budget Billing Plan *not* be a requirement to participate but be maintained as an option for the customer. Renew agrees with the Company that this will potentially allow for better success of FSP compared to LIPP as it will not deter customers who want lower payments during low-usage months or prohibit customers from receiving Low Income Home Energy Assistance Program ("LIHEAP") due to billing credits.[12] Renew also agrees with the Company that customers should receive a larger stipend on a monthly basis. As mentioned in their proposal, this pilot program and evaluation would study the impact of the larger stipend on long-term arrearages.[13] We believe the Company's proposal of tiered stipends in larger amounts is a solid plan (similar to Ameren Missouri's tiered stipends and as recommended in the Energy Burden Study).[14] The Company described the tiers and arrearage plan as follows:

> *The program will offer a $50 bill credit to customers between 41 and 60 percent of the State Median Income ("SMI"), and $75 to customers with an income less than or equal to 40 percent of the SMI. The program will also have an Arrearage Match component, wherein customers who enter into and maintain a twelvemonth payment agreement for half of their arrearage amount will receive a monthly credit on their bills equal to the other half of their arrearage amount.*[15]

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[11] *Direct Testimony of Geoff Marke*, p. 10-11, *Direct Testimony of Nathaniel W. Hackney*, p. 15-16.
[12] *Direct Testimony of Nathaniel W. Hackney*, p. 13-14.
[13] *Id.*
[14] *Id* Schedule NWH-1.
[15] *Id.*, p. 15.

(Renew does note the tariff language provided by the Company is unclear and for both clarification and customer education purposes, Liberty should specifically note this is a monthly credit to customers' bills directly in the tariff.[16])

Renew agrees this higher stipend amount is appropriate, as opposed to the $14 per month discount proposed by Dr. Marke (which would not even be fully realized if the fixed residential charge increase is not approved in this case as the current charge is only $13).[17] The $14 per month discount would not even cover the Company's proposed residential fixed customer charges ($16 per month). There are two scenarios to consider (summarized in Table 3): 1) if the proposed rate increase and Dr. Marke's $14 discount were to go into effect and 2) if the fixed residential charge did not go into effect but Dr. Marke's discount did.

<u>Scenario 1: Proposed fixed residential charge is increased to $16 per month and Dr. Marke's $14 discount were to go into effect</u>

Customers who currently participate in LIPP would see the following changes:

- Their yearly utility bill would increase $168 per year as they would no longer receive the current LIPP credits ($28 for 6 months)
- They would see a $132 decrease in their annual residential fixed charges
    - Previously paying $13 per month for 12 months or $156 per year
    - New charges would be: $16 monthly charge less $14 monthly discount = $2 per month charge for 12 months for a total of $24 per year
    - Net change in annual residential fixed charges: $132 decrease

[16] *<u>Id.</u>* Schedule NWH-2- Final.pdf
[17] *Direct Testimony of Geoff Marke*, p. 10, Tariff Revision (JE-2025-0069).

In short, current LIPP participants' bills would *increase $36 per year* under Dr. Marke's plan (a $168 increase in billing less $132 from reduction in residential fixed charges still results in a $36 increase in annual billing).

Scenario 2: Fixed residential charge stays at $13 per month and Dr. Marke's discount were to go into effect ($13 as that would be the fixed residential charge)

Customers who currently participate in LIPP would see the following changes:

- Their yearly utility bill would increase $168 per year as they would no longer receive the current LIPP credits ($28 for 6 months)
- They would see a $156 decrease in their annual residential fixed charges
    - Previously paying $13 per month for 12 months or $156 per year
    - New charges would be: $0 per month; $13 monthly charge less $13 monthly discount = $156 savings

In short, current LIPP participants' bills would still *increase $12 per year* under Dr. Marke's plan (a $168 increase in billing less $156 savings in residential fixed charges still results in a $12 increase in annual billing).

Table 3: Net change in LIPP participants' annual bills

	Scenario 1	**Scenario 2**
Change in bill due to no longer receiving stipend credit	+$168	+$168
Change in residential fixed rate	-$132	-$156
Net change in annual bills	**+$36**	**+$12**

Renew does agree with Dr. Marke's suggestions that the monthly assistance amounts be fixed monthly amounts (unlike LIPP, which gave $28 in six identified months) and the program be opened to more qualifying customers (not fewer, as Liberty has proposed).[18] The Company proposes reducing participation from current levels (551 current participation; historically 600-700) to only 325 customers receiving stipends and 49 enrolled in the arrearage program.[19] Reducing the number of customers receiving assistance, especially in light of Liberty's billing issues, concerns about future LIHEAP and other federal assistance availability, and potential inflation from a recession and tariffs, will only put more customers at-risk of falling behind on payments or having to choose between power, medical needs, and groceries.[20] Finally, Renew also agrees with Dr. Marke that evaluation can be done quarterly by stakeholders as opposed to hiring an outside study that would potentially cost the Company up to $25,000 (an amount of which could fund 27-40 more participants in the tiered stipend program in a year).[21]

Where Renew differs from the Company and Dr. Marke's proposals is in the amount budgeted for the FSP. Liberty proposed cutting the budget (and reducing participation) to only $300,000 per year.[22] Liberty has not put forth any evidence for a budget reduction for the new FSP or for the LIPP. Dr. Marke proposed quadrupling the current budget by raising it to $4,000,000.[23] If the program were to later require expansion above $500,000 that can be evaluated after this program has been piloted and can be reevaluated at that time. Renew proposes a compromise: 1) keep the $500,000 budget with leftover money rolling forward to future years (which would continue to serve customers in the future as any unspent funds

[18] *Direct Testimony of Geoff Marke*, p. 10-11, *Direct Testimony of Nathaniel W. Hackney*, p. 17.
[19] *Direct Testimony of Nathaniel W. Hackney*, p. 13.
[20] *Direct Testimony of Geoff Marke*, p. 12-13.
[21] *Direct Testimony of Nathaniel W. Hackney*, p. 17, *Direct Testimony of Geoff Marke*, p. 12.
[22] *Direct Testimony of Nathaniel W. Hackney*, p. 15.
[23] *Direct Testimony of Geoff Marke*, p. 11.

would expand program capacity) and 2) keeping 50/50 shareholder-ratepayer funding (as both Liberty and OPC proposed).[24] This compromise would result in a simple reallocation of existing funds and would *not* be driving the rate increase. Renew also believes keeping the same $500,000 budget would help with program evaluation as comparisons would more easily be made to the LIPP.

Table 4: Renew's Proposal

	Capacity	**Stipend/Month**	**Average Arrearage Amount Forgiven**	**Annual Cost**
Tier 1	500	$50		$300,000
Tier 2	150	$75		$135,000
Arrearage Program	100		$139.50	$13,950
	650	**Total Stipend Capacity**		**$435,000**
	100	**Arrearage Capacity**		

Compared to the Company's proposal, this will allow a significantly higher number of customers to participate in the FSP stipend program (650 versus 325 in their proposal) and would increase the capacity for the arrearage program from 49 to 100 participants, annually. However, it would keep the current budget, which seems reasonable since the Company is in the process of straightening out billing and financial issues in another investigation case and arguing the need for a rate increase in this case.

A summary of our proposal for the FSP is as follows:

- Use 60% SMI for eligibility

[24] *Direct Testimony of Nathaniel W. Hackney*, p. 15, *Direct Testimony of Geoff Marke*, p. 11.

- Budget Billing not required but maintained as an option
- Larger stipends in tiered amounts with increased customer capacity ($50 for Tier 1: 500 customers; $75 for Tier 2: 150 customers)
- Arrearage match program (100 customers)
- Keep FSP budget at $500,000; unspent money rolls over annually to allow for future expansion of program capacity
- Evaluation done by stakeholders quarterly

Q: Did you review Dr. Marke's suggested evaluation metrics?

A: Yes, Renew agrees these metrics are important to evaluate and would like to be involved in future evaluation discussions.

IV. LIBERTY'S BILLING ISSUES

Q: Are you familiar with the billing issues addressed in Staff and OPC's testimony?

A: Yes, Renew has reviewed the testimony of the parties, as well as the town hall meetings, local public hearings, and customer comments. Additionally, customers have contacted Renew, especially net metering customers.

Q: What issues have net-metered customers reported to Renew?

A: Customers have reached out stating that they received no credit on their bills for excess energy produced and sold back to Liberty under the terms of their net metering agreement. Additionally, other customers have stated that their bills reflect only a partial offset. Customers claim they have verified their solar systems are properly connected and producing energy, and that in most cases, their average household energy consumption and average net metered energy production have remained constant from prior years. These customers also report receiving conflicting or confusing responses from Liberty when reaching out regarding bills, and that often issues persist for more than one billing cycle.

Q: What, if any, position does Renew support as a resolution in this case?

A: Renew supports the continued moratorium on disconnections, with the addition of late fees, as outlined as by OPC witness Geoff Marke.[25] For net-metered customers, Renew has directed those customers to reach out to Missouri Public Service Commission Consumer Service Unit, as well as to the Staff, so that the customers may receive resolution of their issues, and so that Staff's investigatory efforts are aided. Although not a party to the case, Renew is aware that there is a separate investigation docket, File No. OO-2025-0233, and hope that those complaints are considered in that case's decision, with impacted net-metered customers being compensated for the financial harm they have experienced through the loss of all or a portion of their excess energy credit.

Conclusion

Q: Can you summarize your recommendations for the Commission?

A: Yes. Renew opposes raising the customer charge due to the impact it has on low-income customers and energy efficiency efforts. If an increase is required to meet revenue requirements, Renew recommends it be done through a residential volumetric rate increase. Renew does support modifications to the LIPP proposed by both OPC and Liberty, however, suggests the current budgeted amount of $500,000 remain in place to ensure parties' goals of expanded access is successful. Finally, Renew supports a continuation of a disconnection moratorium, with late fees additionally being suspended, while the outcome of the investigation into Liberty's billing practices is pending. Furthermore, a portion of net-metered customers experienced financial harm

[25] *Direct Testimony of Geoff Marke*, p. 56-57.

from improper accounting of bill credits, and as such, Renew respectfully suggests that a bill credit or other compensation for customers with verifiably incorrect calculations of energy consumption versus offsets for consideration for the Commission to utilize to address the overall billing issues.

Q: Does this conclude your testimony?

A: Yes.

BEFORE THE PUBLIC SERVICE COMMISSION
OF THE STATE OF MISSOURI

In the Matter of the Request of The Empire District Electric Company d/b/a Liberty for Authority to File Tariffs Increasing Rates for Electric Service Provided to Customers In its Missouri Service Area	)))))	**File No. ER-2024-0261** Tracking No. JE-2025-0069

AFFIDAVIT OF JESSICA POLK SENTELL

STATE OF MISSOURI)
) **ss**
COUNTY OF WAYNE)

COMES NOW Jessica Polk Sentell, and on his oath states that he is of sound mind and lawful age; that he prepared the foregoing Rebuttal Testimony; and that the same is true and correct to the best of his knowledge and belief.

Further the Affiant sayeth not.

Jessica Polk Sentell

Subscribed and sworn before me this 5th day of August 2025.

ALLISON R GRIMES
Notary Public - Notary Seal
STATE OF MISSOURI
Wayne County
My Commission Expires: July 8, 2028
Commission # 24052867

Notary Public