

**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)	Case No. ER-2024-0261
For Electric Service Provided to Customers)	
In its Missouri Service Area)	

Statement of Position of Renew Missouri

COMES NOW, Renew Missouri Advocates d/b/a Renew Missouri (Renew Missouri), and for its *Statement of Position* states that Renew Missouri has not taken a position at this time on all of the issues, but reserves the right to take a position based on evidence presented at hearing. For the issues Renew Missouri did sponsor testimony covering, Renew Missouri states as follows:

103. What is the appropriate design of residential rates in this case?

Position: Renew Missouri supports the residential rate design provided by Consumer Council of Missouri's (CCM) in its direct testimony. In particular, Renew Missouri echoes comments made by CCM and the Office of Public Counsel (OPC) regarding keeping the current fixed customer 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. 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.

Green Button Connect

114. Should the Commission order Empire to implement Green Button Connect My Data (“GBC”) in this rate case?

- a. In the event that the Commission orders Empire to implement GBC in this rate case, should the Commission order the tariff proposed by Renew Missouri related to GBC?**
- b. In the event that the Commission orders Empire to implement GBC in this rate case, should the Commission adopt Renew Missouri’s revenue requirement recommendation?**
- c. In the event that the Commission orders Empire to implement GBC in this rate case, should \$100,000 be included in Empire’s ordered revenue requirement to study its participation in a regional data hub?**

Position: Renew Missouri respectfully requests the Commission order Empire to implement GBC, with the associated revenue requirement for both the implementation and the regional hub participation. Across the U.S., numerous other state commissions have required utilities to implement data-sharing platforms of various types. Ameren Missouri will also be implementing GBC as a result of the settlement in ER-2024-0319. This is in recognition of consumers being able to reduce their energy usage and participate in demand response offerings, which mitigate system-wide peaks. Additionally, GBC will enable Missouri to implement FERC Order 2222. The cost estimates provided are reasonable and are based on recent costs from other jurisdictions. Furthermore, the proposed tariff provides critical requirements to ensure fairness in the relationship between Liberty and customer-authorized data recipients. Without clarity about certain provisions such as service guarantees or non-discriminatory application of eligibility criteria, monopolies such as Liberty can abuse their power and unfairly diminish the ability of energy management firms to compete on a level playing field. A tariff is necessary to ensure that ratepayers have the ability to choose energy management providers that best suit them without undue interference.

Customer Programs

115. Should the Low Income Pilot Program (LIPP) continue? If so, what, if any modifications made and what funding level should be ordered?

Position: In its rebuttal testimony, Renew Missouri supported the following modifications to the LIPP or the newly proposed Fresh Start Program.

- Use 60% SMI for eligibility.
- 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.

However, Renew Missouri supports CCM's surrebuttal testimony from Jim Thomas outlining a method to allow for OPC's proposal and Liberty's proposal. Renew Missouri supports more options for energy burdened and low-income customers to utilize in reducing arrearages and disconnections. In that light, Renew Missouri's budget proposal was a compromise between Liberty's reduction, and OPC's larger increase. It also would not increase the revenue requirement in this case. However, Renew Missouri suggests that if the Commission believes a larger budget is appropriate in the circumstances, as proffered by CCM and Staff, Renew Missouri also supports those options.

120. Should the Commission order the structure and meeting requirements for the Low Income Programs Collaborative, as recommended by CCM witness Jim Thomas?

121. Should the Company adopt low income marketing strategies as recommended by CCM witness Jim Thomas?

122. Should the Company adopt the best practices for identifying the needs of high energy burden and low-income communities, targeting resources to those communities, and setting customer targets for achievement, as recommended by CCM witness Jim Thomas?

Position: Renew Missouri supports all three proposals recommended by CCM witness Jim Thomas. With federal and state slashes to low-income programs and budgets, stakeholders should attempt to collaborate and improve any and all low-income programs. These programs are vital lifelines, so stopgap measures to help burdened and low-income customers should be a priority for stakeholders.

Respectfully Submitted,

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Certificate of Service

I hereby certify that copies of the foregoing have been emailed to all counsel of record this 30th day of September 2025.

/s/ Nicole Mers