

FILED
March 19, 2020
Data Center
Missouri Public
Service Commission

Exhibit No.: 203
Issue(s): Keeping Current Overview/
Low Income Weatherization
Witness/Type of Exhibit: Marke/Direct
Sponsoring Party: Public Counsel
Case No.: ER-2019-0335

DIRECT TESTIMONY

OF

GEOFF MARKE

Submitted on Behalf of the Office of the Public Counsel

**UNION ELECTRIC COMPANY
D/B/A AMEREN MISSOURI**

FILE NO. ER-2019-0335

December 4, 2019

OPC Exhibit No. 203
Date 3/4/20 Reporter JNB
File No. ER-2019-0335

BEFORE THE PUBLIC SERVICE COMMISSION
OF THE STATE OF MISSOURI


In the Matter of the Union Electric Company d/b/a)
Ameren Missouri's Tariffs to Decrease Its) File No. ER-2019-0335
Revenues for Electric Service)

AFFIDAVIT OF GEOFF MARKE

STATE OF MISSOURI)
) ss
COUNTY OF COLE)

Geoff Marke, of lawful age and being first duly sworn, deposes and states:

1. My name is Geoff Marke. I am a Regulatory Economist for the Office of the Public Counsel.
2. Attached hereto and made a part hereof for all purposes is my direct testimony.
3. I hereby swear and affirm that my statements contained in the attached testimony are true and correct to the best of my knowledge and belief.




Geoff Marke
Chief Economist

Subscribed and sworn to me this 4th day of December 2019.



JEREFEE A. BUCKMAN
My Commission Expires
August 23, 2021
Cole County
Commission #13754037



Jerefe A. Buckman
Notary Public

My commission expires August 23, 2021.

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DIRECT TESTIMONY
OF
GEOFF MARKE
UNION ELECTRIC COMPANY
d/b/a Ameren Missouri
CASE NO. ER-2019-0335

1 **I. INTRODUCTION**

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

3 A. Geoff Marke, PhD, Chief Economist, Office of the Public Counsel (“OPC” or “Public
4 Counsel”), P.O. Box 2230, Jefferson City, Missouri 65102.

5 **Q. What are your qualifications and experience?**

6 A. I have been in my present position with OPC since 2014 where I am responsible for economic
7 analysis and policy research in electric, gas, and water utility operations.

8 **Q. Have you testified previously before the Missouri Public Service Commission?**

9 A. Yes. A listing of the Commission cases in which I have previously filed testimony and/or
10 comments is attached in Schedule GM-1.

11 **Q. What is the purpose of your direct testimony?**

12 A. The purpose of this testimony is to provide the Commission an overview and subsequent
13 recommendations for Ameren Missouri’s bill payment assistance program “Keeping Current,”
14 and Ameren Missouri’s Low-Income Weatherization Assistance (“LIWAP”) funding.

15 **Q. Would you summarize your recommendations on the Keeping Current program moving
16 forward?**

17 A. I have two primary recommendations: 1.) that a 20% budget variance (\$141,200) extension be
18 created and applied from the ratepayer-funded portion of the current budget.¹ Alternatively, I
19 recommend that any remaining yearly balance be allocated evenly to the remaining

¹ The current \$1,331,000 annual Keeping Current budget is funded at 53% (\$706,000) by ratepayers and 47% (\$625,000) by Ameren shareholders.

1 participants' last monthly bill; and 2.) Ameren Missouri be required to contract with a third-
2 party consultant/researcher to provide a report to the Keeping Current collaborative by October
3 31, 2020, and subsequently file in Ameren Missouri's next rate case that includes (at a
4 minimum) the following items:

- 5 • A literature review of bill assistance best practices across utilities;
- 6 • A proposal that includes increasing the annual budget and removing the pilot status;
- 7 • An alternative proposal that focuses on specific targeted bill assistance (e.g., former
8 homeless population, electric space-heating, renters, etc.); and
- 9 • A recommendation on how to leverage existing funding mechanisms to maximize
10 program impact moving forward.

11 **II. KEEPING CURRENT OVERVIEW**

12 **Q. What is Ameren Missouri's Keeping Current program?**

13 A. Keeping Current is an energy assistance program with two parts: 1.) the year-round Keeping
14 Current component; and 2.) the summer-only Keeping Cool component. The former provides
15 monthly bill credits and arrearage reduction for customers who continue to make monthly bill
16 payments. The latter provides bill credits in the summer months (primarily June, July and
17 August) to offset the costs of air condition usage.

18 Ameren Missouri introduced their Keeping Current energy assistance pilot program in October
19 2010. The program was developed in collaboration with AARP, Consumers Council of
20 Missouri ("CCM"), Missouri Office of the Public Counsel ("OPC"), Missouri Public Service
21 Commission Staff ("Staff"), Missouri Industrial Energy Consumers ("MIEC") and the
22 Missouri Retailers Association ("MRA"). The program funding was reauthorized and the
23 program has continued with some refinements to the design based on periodic evaluation
24 findings. Presently the annual budget for the program is \$1,331,000 with \$706,000 provided
25 by ratepayers (specifically, 1, 2, 3, 4, 11 and 12 (M) classes) and \$625,000 provided by
26 shareholders.

1 **Q. Describe the targeted demographics of the program?**

2 A. Based on participant data from 2018 and compiled by the third-party (Apprise) evaluation,
3 Keeping Current participants included:

- 4 • 35% were below 50% of the federal poverty line (\$12,550 or below, family of four);
- 5 • 45% were between 51% and 100% of the federal poverty line (\$12,550 to \$25,100
6 family of four);
- 7 • 20% were above 100% of the federal poverty line (\$25,101 or more, family of four);
- 8 • 65% had at least one vulnerable member (elderly, disabled and/or young child) in the
9 household; and
- 10 • About 70% were unemployed either throughout or at some point during the year.

11 Additionally, based on 2018 data from the same study, Keeping Cool participants included:

- 12 • 70% were between 50% and 100% (\$12,550 to \$25,100 family of four) of the federal
13 poverty line;
- 14 • 82% had an elderly household member; and
- 15 • 64% were unemployed and 34% were retired.

16 **Q. Has the program been successful?**

17 A. Yes. I consider the Ameren Missouri Keeping Current Low-Income Pilot program the best bill
18 and arrearage assistance program currently in place amongst all of our investor-owned utilities.
19 Each subsequent third-party evaluation of the program has come back better than the last and
20 Ameren Missouri's in-house personnel deserves a lot of credit for being receptive to
21 stakeholders concerns, suggestions and spearheaded many practical solutions for its customers.

22 **Q. What is the basis for that conclusion?**

23 A. In judging the success of a bill assistance program it is important that expectations of "success"
24 are appropriately calibrated. Keeping in mind the aforementioned demographic information
25 stated above, Keeping Current targets customers who have a high probability of losing service.
26 Keeping Current bill credits and arrearage reductions allowed the median average energy

1 burden to decrease from 30% to 20% for electric heating participants and a decrease from 24%
2 to 20% for non-electric heating customers.²

3 Additionally, Keeping Current has continued to produce more favorable outcomes in each
4 successive third-party evaluation. For example, in the most recent evaluation it was determined
5 that 59% of the Keeping Current maintained and received benefits over the twelve-month
6 evaluation period, that is, a little more than half of the participants did not drop out of the
7 program due to non-payment (or other reasons).³ This is a considerable increase from the 2016
8 study (46%) and the 2013 study (29%).

9 **Q. Have other utilities adopted a similar Keeping Current energy assistance program in**
10 **their tariff?**

11 A. Spire adopted a similar bill payment program in its last rate case.

12 **Q. Did Spire experience similar results as Ameren Missouri?**

13 A. In part. In Spire's East's (formerly Laclede Natural Gas) first year of its program the utility had
14 to suspend applications out of fear of over enrollment and concern that the annual budget would
15 be exceeded. However, this preemptive action resulted in only 78% of its annual budget
16 actually being spent. In that case, almost \$200,000 in bill assistance was left unutilized. Spire
17 West was more successful with only \$35,500 in bill assistance left unutilized in its first year.

18 **Q. What recommendations do you have for the Commission regarding Keeping Current?**

19 A. For the budget, I first recommend that shareholder dollars be fully expended first before
20 ratepayer dollars are allocated. Second, I recommend that a 20% variance to the ratepayer-
21 funded portion of the annual budget be included to prevent a Spire East scenario happening in
22 the future. This recommendation allows for up to an additional \$141,200 in the annual budget.
23 Such a buffer could allow Ameren Missouri to attract more participants but have the confidence
24 that the budget will still be met without Commission approval. At a minimum, a budget
25 variance should ensure that the full amount would get spent down every year. Alternatively, I

² Energy Burden is the percent of income that is spent on energy.

³ For example, the participant moved or became deceased.

1 also support allocating any remaining yearly balance evenly to the remaining participants' last
2 monthly bill. This too, would ensure that Ameren Missouri would always expend the full
3 budget as contemplated.

4 **Q. Do you have any other recommendations regarding Keeping Current?**

5 A. Yes. I recommend that historic funds allocated for the evaluation of Keeping Current program
6 be redirected (for a one-time event) to a program design and expansion report for collaborative
7 members to review in time for Ameren Missouri's next rate case.

8 **Q. What would such a report include?**

9 A. I envision hiring a third-party consultant to provide a report to the Keeping Current
10 collaborative by October 31st 2020 and to subsequently file the following items in Ameren
11 Missouri's next rate case:

- 12 • A literature review of bill assistance best practices across utilities;
- 13 • A proposal that includes increasing the annual budget and removing the pilot status;
- 14 • An alternative proposal that focuses on specific targeted bill assistance (e.g., former
15 homeless population, electric space-heating, renters, etc.); and
- 16 • A recommendation on how to leverage existing funding mechanisms to maximize
17 program impact moving forward.

18 **Q. What would be the goal in this report?**

19 A. Keeping Current has proven to be a successful program at its small scale. The program is also
20 now entering the 10th year of a seemingly "evergreen" pilot status.

21 In my opinion, it is time to consider next steps in the program—whether that means scaling the
22 program up or expanding to another targeted demographic. My hope is that a 3rd party program
23 design and expansion report can help facilitate that dialogue amongst relevant stakeholders in
24 time to produce tangible recommendations to the Commission for Ameren Missouri's next rate
25 case. The aforementioned four bullet-points provide a reasonable framework to work from and
26 I welcome feedback in rebuttal testimony from interested parties on the issue.

1 **III. LOW INCOME WEATHERIZATION**

2 **Q. Do you have any recommendations regarding Ameren Missouri's LIWAP funding?**

3 A. Consistent with my position in the Ameren Missouri Gas Case No: GR-2019-0077, I
4 recommend that Ameren Missouri's tariff be adjusted to grant recipient Community Action
5 Agencies more flexibility and discretion in how they utilize weatherization assistance funding.
6 That is, the Agencies should be allowed to deviate from the Department of Energy guidelines.
7 The relevant stipulation language in the Ameren Gas Case read as follows:

8 Since the administrative functions and the funding for IEWAP are not
9 federally sourced, the agencies need not adhere to the same strict guidelines
10 for spending these funds as necessary for spending federally administered
11 or sourced funds; therefore, Agencies will not have to adhere to the US DOE
12 guidelines for weatherization. Agencies, at their discretion, can use funds to
13 weatherize properties that have historically been passed over due to
14 eligibility related to date-last-weatherized or reasonable health and hazard
15 conditions. Participating Agencies are required to document use of
16 discretionary funds and number of properties completed annually with
17 invitations extended to Agencies to participate once a year (by phone or in
18 person) in one of the two bi-annual collaborative energy efficiency
19 meetings. During the collaborative energy efficiency meetings,
20 stakeholders shall discuss any guidelines that may be necessary for the
21 Agencies to implement.⁴

22 **Q. Does this conclude your testimony?**

23 A. Yes.

⁴ GR-2019-0077 First Amended Nonunanimous Stipulation and Agreement p. 5.

**CASE PARTICIPATION OF
GEOFF MARKE, PH.D.**

Company Name	Employed Agency	Case Number	Issues
Union Electric Company d/b/a Ameren Missouri	Office of Public Counsel (OPC)	ER-2019-0335	Direct: Keeping Current Bill Assistance Program
Rule Making	OPC	AW-2020-0148	Memorandum: Residential Customer Disconnections and Data Standardization
Empire District Electric Company /Kansas City Power & Light & KCP&L Greater Missouri Operations Company/Union Electric Company d/b/a Ameren Missouri	OPC	EO-2020-0047 EO-2020-0046 EO-2020-0045 EO-2020-0044	Memorandum: Additive Manufacturing, Cement Block Battery Storage, Virtual Power Plant, Customer-Side Renewable Generation, Historical Review of energy forecasts (KCPL, GMO and Empire-Specific) and Rush Island and Labadie Power Plant Environmental Retrofits (Ameren specific)
KCP&L Greater Missouri Operations Company & Kansas City Power and Light Company	OPC	EO-2019-0132	Rebuttal: Response to KCPL's MEEIA application, Equitable Energy Efficiency Baseline, WattTime: Automated Emissions Reduction, PAYS, Urban Heat Island Mitigation Surrebuttal: Market Potential Study, Single Family Low-Income
KCP&L Greater Missouri Operations Company	OPC	EC-2019-0200	Surrebuttal: Deferral Accounting and Stranded Assets
Union Electric Company d/b/a Ameren Missouri	OPC	ED-2019-0309	Memorandum: on the "Aluminum Smelter Rate"
KCP&L Greater Missouri Operations Company	OPC	EO-2019-0067	Rebuttal: Renewable Energy Credits
Union Electric Company d/b/a Ameren Missouri	OPC	EO-2019-0314	Memorandum: Notice of Deficiency to Annual IRP Update
Rule Making	OPC	WX-2019-0380	Memorandum: on Affiliate Transaction Rules for Water Corporations
Working Case: Evaluate Potential Mechanisms for Facilitating Installation of Electric Vehicle Charging Stations	OPC	EW-2019-0229	Memorandum: on Policy Surrounding Electric Vehicles and Electric Vehicle Charging Stations
Rule Making	OPC	EX-2019-0050	Memorandum on Solar Rebates and Low Income Customers
Union Electric Company d/b/a Ameren Missouri	OPC	GR-2019-0077	Direct: Billing Practices Rebuttal: Rate Design, Decoupling, Energy Efficiency, Weatherization, CHP
Empire District Electric Company	OPC	EA-2019-0010	Rebuttal: Levelized Cost of Energy, Wind in the Southwest Power Pool

			Surrebuttal: SPP Market Conditions, Property Taxes, Customer Protections
Empire District Electric Company /Kansas City Power & Light & KCP&L Greater Missouri Operations Company/Union Electric Company d/b/a Ameren Missouri	OPC	EO-2019-0066 EO-2019-0065 EO-2019-0064 EO-2019-0063	Memorandum: Additive Manufacturing and Cement Block Battery Storage (IRP: Special Contemporary Topics)
Working Case: Allocation of Solar Rebates from SB 564	OPC	EW-2019-0002	Memorandum on Solar Rebates and Low Income Customers
Rule Making Workshop	OPC	AW-2018-0393	Memorandum: Supplemental Response to Staff Questions pertaining to Rules Governing the Use of Customer Information
Union Electric Company d/b/a Ameren Missouri	OPC	ET-2018-0132	Rebuttal: Line Extension / Charge Ahead – Business Solutions / Charge Ahead – Electric Vehicle Infrastructure Supplemental Rebuttal: EV Adoption Performance Base Metric
Union Electric Company d/b/a Ameren Missouri	OPC	EO-2018-0211	Rebuttal: MEEIA Cycle III Application Surrebuttal: Cost Effectiveness Tests / Equitable Energy Efficiency Baseline
Union Electric Company d/b/a Ameren Missouri	OPC	EA-2018-0202	Rebuttal: Renewable Energy Standard Rate Adjustment Mechanism/Conservation Surrebuttal: Endangered and Protected Species
Kansas City Power & Light & KCP&L Greater Missouri Operations Company	OPC	ER-2018-0145 ER-2018-0146	Direct: Smart Grid Data Privacy Protections Rebuttal: Clean Charge Network / Community Solar / Low Income Community Solar / PAYS/ Weatherization/Economic Relief Pilot Program/Economic Development Rider/Customer Information System and Billing Rebuttal: TOU Rates / IBR Rates / Customer Charge / Restoration Charge Surrebuttal: KCPL-GMO Consolidation / Demand Response / Clean Charge Network / One CIS: Privacy, TOU Rates, Billing & Customer Experience
Union Electric Company d/b/a Ameren Missouri	OPC	ET-2018-0063	Rebuttal: Green Tariff

Liberty Utilities	OPC	GR-2018-0013	Surrebuttal: Decoupling
Empire District Electric Company	OPC	EO-2018-0092	Rebuttal: Overview of proposal/ MO PSC regulatory activity / Federal Regulatory Activity / SPP Activity and Modeling / Ancillary Considerations Surrebuttal Response to parties Affidavit in opposition to the non-unanimous stipulation and agreement
Great Plains Energy Incorporated, Kansas City Power & Light Company, KCP&L Greater Missouri Operations Company, and Westar Energy, Inc.	OPC	EM-2018-0012	Rebuttal: Merger Commitments and Conditions / Outstanding Concerns
Missouri American Water	OPC	WR-2017-0285	Direct: Future Test Year/ Cost Allocation Manual and Affiliate Transaction Rules for Large Water Utilities / Lead Line Replacement Direct: Rate Design / Cost Allocation of Lead Line Replacement Rebuttal: Lead Line Replacement / Future Test Year/ Decoupling / Residential Usage / Public-Private Coordination Rebuttal: Rate Design Surrebuttal: Affiliate Transaction Rules / Decoupling / Inclining Block Rates / Future Test Year / Single Tariff Pricing / Lead Line Replacement
Missouri Gas Energy / Laclede Gas Company	OPC	GR-2017-0216 GR-2017-0215	Rebuttal: Decoupling / Rate Design / Customer Confidentiality / Line Extension in Unserved and Underserved Areas / Economic Development Rider & Special Contracts Surrebuttal: Pay for Performance / Alagasco & EnergySouth Savings / Decoupling / Rate Design / Energy Efficiency / Economic Development Rider: Combined Heat & Power
Indian Hills Utility	OPC	WR-2017-0259	Direct: Rate Design
Rule Making	OPC	EW-2018-0078	Memorandum: Cogeneration and net metering - Disclaimer Language regarding rooftop solar
Empire District Electric Company	OPC	EO-2018-0048	Memorandum: Integrated Resource Planning: Special Contemporary Topics Comments

Kansas City Power & Light	OPC	EO-2018-0046	Memorandum: Integrated Resource Planning: Special Contemporary Topics Comments
KCP&L Greater Missouri Operations Company	OPC	EO-2018-0045	Memorandum: Integrated Resource Planning: Special Contemporary Topics Comments
Missouri American Water	OPC	WU-2017-0296	Direct: Lead line replacement pilot program Rebuttal: Lead line replacement pilot program Surrebuttal: Lead line replacement pilot program
KCP&L Greater Missouri Operations Company	OPC	EO-2017-0230	Memorandum on Integrated Resource Plan, preferred plan update
Working Case: Emerging Issues in Utility Regulation	OPC	EW-2017-0245	Memorandum on Emerging Issues in Utility Regulation / Presentation: Inclining Block Rate Design Considerations Presentation: Missouri Integrated Resource Planning: And the search for the "preferred plan." Memorandum: Draft Rule 4 CSR 240-22.055 DER Resource Planning
Rule Making	OPC	EX-2016-0334	Memorandum on Missouri Energy Efficiency Investment Act Rule Revisions
Great Plains Energy Incorporated, Kansas City Power & Light Company, KCP&L Greater Missouri Operations Company, and Westar Energy, Inc.	OPC	EE-2017-0113 / EM-2017-0226	Direct: Employment within Missouri / Independent Third Party Management Audits / Corporate Social Responsibility
Union Electric Company d/b/a Ameren Missouri	OPC	ET-2016-0246	Rebuttal: EV Charging Station Policy Surrebuttal: EV Charging Station Policy
Kansas City Power & Light		ER-2016-0156	Direct: Consumer Disclaimer Direct: Response to Commission Directed Questions Rebuttal: Customer Experience / Greenwood Solar Facility / Dues and Donations / Electric Vehicle Charging Stations Rebuttal: Class Cost of Service / Rate Design Surrebuttal: Clean Charge Network / Economic Relief Pilot Program / EEI Dues / EPRI Dues

Union Electric Company d/b/a Ameren Missouri	OPC	ER-2016-0179	Direct: Consumer Disclaimer / Transparent Billing Practices / MEEIA Low-Income Exemption Direct: Rate Design Rebuttal: Low-Income Programs / Advertising / EEI Dues Rebuttal: Grid-Access Charge / Inclining Block Rates /Economic Development Riders
KCP&L Greater Missouri Operations Company	OPC	ER-2016-0156	Direct: Consumer Disclaimer Rebuttal: Regulatory Policy / Customer Experience / Historical & Projected Customer Usage / Rate Design / Low- Income Programs Surrebuttal: Rate Design / MEEIA Annualization / Customer Disclaimer / Greenwood Solar Facility / RESRAM / Low-Income Programs
Empire District Electric Company, Empire District Gas Company, Liberty Utilities (Central) Company, Liberty Sub- Corp.	OPC	EM-2016-0213	Rebuttal: Response to Merger Impact Surrebuttal: Resource Portfolio / Transition Plan
Working Case: Polices to Improve Electric Regulation	OPC	EW-2016-0313	Memorandum on Performance-Based and Formula Rate Design
Working Case: Electric Vehicle Charging Facilities	OPC	EW-2016-0123	Memorandum on Policy Considerations of EV stations in rate base
Empire District Electric Company	OPC	ER-2016-0023	Rebuttal: Rate Design, Demand-Side Management, Low-Income Weatherization Surrebuttal: Demand-Side Management, Low-Income Weatherization, Monthly Bill Average
Missouri American Water	OPC	WR-2015-0301	Direct: Consolidated Tariff Pricing / Rate Design Study Rebuttal: District Consolidation/Rate Design/Residential Usage/Decoupling Rebuttal: Demand-Side Management (DSM)/ Supply-Side Management (SSM) Surrebuttal: District Consolidation/Decoupling Mechanism/Residential Usage/SSM/DSM/Special Contracts

Working Case: Decoupling Mechanism	OPC	AW-2015-0282	Memorandum: Response to Comments
Rule Making	OPC	EW-2015-0105	Missouri Energy Efficiency Investment Act Rule Revisions, Comments
Union Electric Company d/b/a Ameren Missouri	OPC	EO-2015-0084	Triennial Integrated Resource Planning Comments
Union Electric Company d/b/a Ameren Missouri	OPC	EO-2015-0055	Rebuttal: Demand-Side Investment Mechanism / MEEIA Cycle II Application Surrebuttal: Potential Study / Overearnings / Program Design Supplemental Direct: Third-party mediator (Delphi Panel) / Performance Incentive Supplemental Rebuttal: Select Differences between Stipulations Rebuttal: Pre-Pay Billing
The Empire District Electric Company	OPC	EO-2015-0042	Integrated Resource Planning: Special Contemporary Topics Comments
KCP&L Greater Missouri Operations Company	OPC	EO-2015-0041	Integrated Resource Planning: Special Contemporary Topics Comments
Kansas City Power & Light	OPC	EO-2015-0040	Integrated Resource Planning: Special Contemporary Topics Comments
Union Electric Company d/b/a Ameren Missouri	OPC	EO-2015-0039	Integrated Resource Planning: Special Contemporary Topics Comments
Union Electric Company d/b/a Ameren Missouri	OPC	EO-2015-0029	Ameren MEEIA Cycle I Prudence Review Comments
Kansas City Power & Light	OPC	ER-2014-0370	Direct (Revenue Requirement): Solar Rebates Rebuttal: Rate Design / Low-Income Weatherization / Solar Rebates Surrebuttal: Economic Considerations / Rate Design / Cyber Security Tracker
Rule Making	OPC	EX-2014-0352	Memorandum Net Metering and Renewable Energy Standard Rule Revisions,
The Empire District Electric Company	OPC	ER-2014-0351	Rebuttal: Rate Design/Energy Efficiency and Low-Income Considerations
Rule Making	OPC	AW-2014-0329	Utility Pay Stations and Loan Companies, Rule Drafting, Comments
Union Electric Company d/b/a Ameren Missouri	OPC	ER-2014-0258	Direct: Rate Design/Cost of Service Study/Economic Development Rider Rebuttal: Rate Design/ Cost of Service/ Low Income Considerations Surrebuttal: Rate Design/ Cost-of-Service/ Economic Development Rider
KCP&L Greater Missouri Operations Company	OPC	EO-2014-0189	Rebuttal: Sufficiency of Filing Surrebuttal: Sufficiency of Filing

KCP&L Greater Missouri Operations Company	OPC	EO-2014-0151	Renewable Energy Standard Rate Adjustment Mechanism (RESRAM) Comments
Liberty Natural Gas	OPC	GR-2014-0152	Surrebuttal: Energy Efficiency
Summit Natural Gas	OPC	GR-2014-0086	Rebuttal: Energy Efficiency Surrebuttal: Energy Efficiency
Union Electric Company d/b/a Ameren Missouri	OPC	ER-2012-0142	Direct: PY2013 EM&V results / Rebound Effect Rebuttal: PY2013 EM&V results Surrebuttal: PY2013 EM&V results Direct: Cycle I Performance Incentive Rebuttal: Cycle I Performance Incentive
Kansas City Power & Light	Missouri Public Service Commission Staff	EO-2014-0095	Rebuttal: MEEIA Cycle I Application testimony adopted
KCP&L Greater Missouri Operations Company	Missouri Division of Energy (DE)	EO-2014-0065	Integrated Resource Planning: Special Contemporary Topics Comments
Kansas City Power & Light	DE	EO-2014-0064	Integrated Resource Planning: Special Contemporary Topics Comments
The Empire District Electric Company	DE	EO-2014-0063	Integrated Resource Planning: Special Contemporary Topics Comments
Union Electric Company d/b/a Ameren Missouri	DE	EO-2014-0062	Integrated Resource Planning: Special Contemporary Topics Comments
The Empire District Electric Company	DE	EO-2013-0547	Triennial Integrated Resource Planning Comments
Working Case: State-Wide Advisory Collaborative	OPC	EW-2013-0519	Presentation: Does Better Information Lead to Better Choices? Evidence from Energy-Efficiency Labels Presentation: Customer Education & Demand-Side Management Presentation: MEEIA: Strengths, Weaknesses, Opportunities and Threats (SWOT) Analysis
Independence-Missouri	OPC	Indy Energy Forum 2014	Presentation: Energy Efficiency
Independence-Missouri	OPC	Indy Energy Forum 2015	Presentation: Rate Design
NARUC – 2017 Winter, Washington D.C.	OPC	Committee on Consumer Affairs	Presentation: PAYS Tariff On-Bill Financing
NASUCA – 2017 Mid-Year, Denver	OPC	Committee on Water Regulation	Presentation: Regulatory Issues Related to Lead-Line Replacement of Water Systems

NASUCA – 2017 Annual Baltimore,	OPC	Committee on Utility Accounting	Presentation: Lead Line Replacement Accounting and Cost Allocation
NARUC – 2018 Annual, Orlando	OPC	Committee on Consumer Affairs	Presentation: PAYS Tariff On-Bill Financing Opportunities & Challenges
Critical Consumer Issues Forum (CCIF)—New Orleans	OPC	Examining Policies for Delivering Smart Mobility	Presentation: Missouri EV Charging Station Policy in 4 Acts: Missouri Office of the Public Counsel Perspective
Michigan State, Institute of Public Utilities, 2019	OPC	Camp NARUC: Fundamentals	Presentation: Revenue Requirement
NARUC/US AID, Republic of North Macedonia, Skopje 2019	OPC	NARUC /US AID: Cybersecurity	Presentation: Case Study: The Missouri Experience