

Exhibit No. 137

Staff – Exhibit 137
Testimony of Amy L. Eichholz
Rebuttal
File No. ER-2024-0261

Exhibit No.:
Issue(s): Low Income Pilot
Program
Witness: Amy L. Eichholz
Sponsoring Party: MoPSC Staff
Type of Exhibit: Rebuttal Testimony
Case No.: ER-2024-0261
Date Testimony Prepared: August 18, 2025

MISSOURI PUBLIC SERVICE COMMISSION

INDUSTRY ANALYSIS DIVISION

ENERGY RESOURCES DEPARTMENT

REBUTTAL TESTIMONY

OF

AMY L. EICHHOLZ

**EMPIRE DISTRICT ELECTRIC COMPANY,
d/b/a Liberty**

CASE NO. ER-2024-0261

*Jefferson City, Missouri
August 2025*

- 1
- 2
- 3
- 4
- 5
- 6
- 7
- 8
- 9
- 10
- 11
- 12
- 13
- 14
- 15
- 16
- 17
- 18
- 19
- 20
- 21
- 22
- 23

OF

AMY L. EICHHOLZ

**Empire District Electric Company,
d/b/a Liberty**

CASE NO. ER-2024-0261

Q. Please state your name and business address.

A. My name is Amy L. Eichholz, and my business address is Missouri Public Service Commission, P. O. Box 360, Jefferson City, Missouri 65102.

Q. By whom are you employed and in what capacity?

A. I am employed by the Missouri Public Service Commission (“Commission”) as a Research/Data Analyst of the Energy Resources Department.

Q. What is your educational background and work experience?

A. Please refer to the attached Schedule ALE-r1.

Q. Have you previously filed testimony before this Commission?

A. Yes. Please also refer to the attached Schedule ALE-r1 for a list of cases in which I have previously participated in.

Q. What is the purpose of your rebuttal testimony?

A. The purpose of my rebuttal testimony is to briefly discuss the proposed changes to The Empire District Electric Company d/b/a Liberty's ("Empire") Low-Income Pilot Program ("LIPP") discussed by Dr. Geoff Marke from the Office of the Public Counsel ("OPC") and the new "Fresh Start Plan" discussed in the direct testimony of Empire witness Nathaniel W. Hackney.

LOW-INCOME PILOT PROGRAM

Q. What is the purpose of LIPP?

A. The LIPP is used to provide electric bill payment assistance to customers meeting the Program's eligibility requirements and to evaluate the impact of the Program on the disconnections and uncollectible/bad debts amounts of Empire. The availability of the LIPP is limited to customers on the Residential Service Rates who have an income at or below 135% of the Federal Poverty Level ("FPL"). The designated Community Action Agency ("CAA") will be responsible for determining the income level of customers eligible for the Program. No customer with an arrearage that includes a theft of service charge shall be eligible to participate in the Program. The total annual program budget is \$500,000 with any unspent funds rolling over to Empire's low-income weatherization program.¹

Q. Briefly describe OPC witness Dr. Geoff Marke's proposed changes for the LIPP.

A. In his direct testimony, in regard to language in Senate Bill Four ("SB4")², Dr. Marke recommends that costs related to the residential customer charge be waived for income-eligible residential customers whose incomes are at or below 150% FPL. To incorporate this into the LIPP, Dr. Marke recommends to extend the eligibility from 135% FPL to 60% area median income. The total annual bill credit remains the same but Dr. Marke recommends it be applied to the customer charge for every month as opposed to only six months. He also recommends a larger annual budget of \$4 million be funded 50/50 between shareholders and ratepayers in anticipation of need.³ Dr. Marke recommends that any unexpended funding be directed to the Critical Medical Needs program. Dr. Marke's

¹ P.S.C.Mo.No.6, Sec. 4,1st Revised, Sheet No. 24

² Senate Bill No. 4. 103rd General Assembly (2025) <https://senate.mo.gov/25info/pdf-bill/tat/SB4.pdf> pg. 84.

³ Direct testimony of Dr. Marke, page 11, lines 2 - 6

1 recommendation is heavily based on his concern that Low-Income Heating Energy Assistance
2 Program (“LIHEAP”) funding is at risk of being discontinued after the end of September and
3 before the winter season.

4 Q. Does Mr. Hackney think Empire should continue with the LIPP?

5 A. According to Mr. Hackney’s direct testimony, Empire believes it is important to
6 continue to support a program which provides assistance to some of its most vulnerable
7 customers. However, Empire believes, for a variety of reasons, that the funds can better serve
8 its income-eligible customers via a new program known as the Fresh Start Plan.⁴

9 **FRESH START PLAN**

10 Q. What is Empire’s proposed Fresh Start Plan?

11 A. The Fresh Start Plan is a program that would offer a larger stipend to a smaller
12 sample of customers; these customers would not be eligible to participate in Empire’s Budget
13 Billing Plan. The program would evaluate, on a pilot scale, how long participating customers’
14 long-term arrearages are affected. It is intended that the Fresh Start Plan would replace the
15 LIPP. This plan would solicit CAAs in Empire’s service territory and offer a tiered credit to
16 eligible customers based on income. The proposed annual budget is \$300,000 split between
17 ratepayers and shareholders 50/50. Any unspent funds would remain and rollover to the
18 following year. The program would offer a \$50 bill credit to customers between 40 and 60
19 percent of the State Median Income (“SMI”), and \$75 to customers with an income less than or
20 equal to 40 percent of the SMI. The program will also have an Arrearage Match component,
21 wherein customers who enter into and maintain a 12-month payment agreement for half of their
22 arrearage amount would receive a monthly credit on their bills equal to the other half of their

⁴ Direct testimony of Mr. Hackney, page 4, lines 12 - 16

1 arrearage amount. After citing Budget Billing Plan as a barrier to the success of the LIPP Empire
2 will not offer budget billing to Fresh Start customers.

3 Q. What does Staff recommend in response to Dr. Marke and Mr. Hackney's
4 recommendations with regard to the LIPP?

5 A. Staff does not support Dr. Marke's or Mr. Hackney's recommendations as
6 proposed. Staff prefers to keep the LIPP as a discount to a customer's total bill, rather than a
7 change to the customer charge for eligible customers. While Staff acknowledges changes in
8 Missouri due to the passage of SB4, this case is not appropriate to make those changes.
9 Staff believes it more appropriate to address SB4 and its potential impact on low-income policy
10 as a collaborative effort between stakeholders outside of a general rate case. There is no
11 timeline specifically set out in SB4 for the Commission to approve a special alternative
12 residential customer rate or bill discount,⁵ and therefore should be carefully thought out as
13 policy as-a-whole as opposed to piecemealing policy for each utility in its current, or next,
14 respective general rate case.

15 However, Staff is including certain aspects of both Dr. Marke's and Mr. Hackney's
16 recommendations in its recommended modifications to the LIPP. Staff does not support
17 replacing the LIPP with the Fresh Start Plan, but recommends the LIPP be modified to include:

- 18 • a budget of \$1,000,000
- 19 • any unspent funds would remain in the LIPP and rollover to the following year.
- 20 • eligibility at 60% Area Median Income
- 21 • a tiered credit to customers based on income as verified by the CAA

⁵ Senate Bill No. 4. 103rd General Assembly (2025) <https://www.senate.mo.gov/25info/pdf-bill/tat/SB4.pdf> pg. 84.

- a \$50 bill credit to customers between 41 and 60 percent of Area Median Income
- a \$75 bill credit to customers with an income less or equal to 40 percent of Area Median Income

- customers are not required to be on Empire's Budget Billing Plan

Q. Why is Staff making these recommendations?

A. Staff's budget recommendation recognizes Dr. Marke's concern that LIHEAP funding is at risk of being discontinued, however, increasing the ratepayer-funded portion to \$2,000,000 during these uncertain times is not appropriate. Staff recognizes that if LIHEAP funding is discontinued there will likely be an increased need for programs such as LIPP. However, Staff is recommending a more gradual increase to the LIPP budget. Staff's recommendation to use 60% Area Median Income as opposed to SMI or FPL is because Area Median Income offers a more localized perspective. Area Median Income is calculated based on the median income of all households in a specific area, such as a city or county. Staff recommends an increase to bill credits since an increase to the budget would likely increase participation. The tiered approach allows for those in greater need to receive a larger bill credit. Staff's recommendation that LIPP customers not be required to be on Empire's Budget Billing Plan is because Staff believes budget billing may be misleading for customers receiving financial assistance. As Mr. Hackney states in his direct testimony, when a customer is on the Budget Billing Plan, their monthly bills during peak season appear to be lower than they actually are due to the nature of the program. This means that when the Budget Billing Plan customers apply for and receive financial assistance, such as LIHEAP, they often have a misleading credit balance on their account. This is because the net of their monthly

Rebuttal Testimony of
Amy L. Eichholz

1 Budget Billing Plan installment is significantly less than the payment they receive from
2 LIHEAP, but not lower than the amount they actually owe to Empire.

3 Q. Does this conclude your rebuttal testimony?

4 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)	Case No. ER-2024-0261
Authority to File Tariffs Increasing Rates)	
for Electric Service Provided to Customers)	
in Its Missouri Service Area)	

AFFIDAVIT OF AMY L. EICHHOLZ

STATE OF MISSOURI)	
)	ss.
COUNTY OF COLE)	

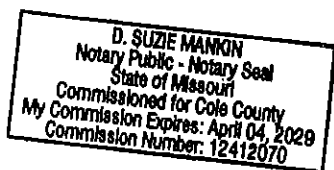
COMES NOW AMY L. EICHHOLZ and on her oath declares that she is of sound mind and lawful age; that she contributed to the foregoing *Rebuttal Testimony of Amy L. Eichholz*; and that the same is true and correct according to her best knowledge and belief.

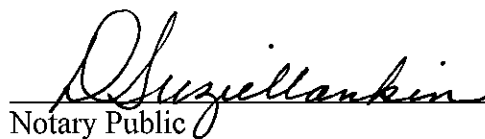
Further the Affiant sayeth not.


AMY L. EICHHOLZ

JURAT

Subscribed and sworn before me, a duly constituted and authorized Notary Public, in and for the County of Cole, State of Missouri, at my office in Jefferson City, on this 11th day of August 2025.




Notary Public

Amy L. Eichholz

Education and Employment Background

I am Research/Data Analyst of the Energy Resources Department, Industry Analysis Division of the Missouri Public Service Commission. Prior to my current position, I was employed at the Missouri Department of Natural Resources as an Environmental Program Analyst from January 2022 through December 2022.

I received a Bachelor of Science degree in Business Administration in December 1997, and a minor in Marketing, all from Lincoln University, Jefferson City, Missouri.

Prior to first joining the Commission, I worked in various positions within three state agencies of the State of Missouri. I was employed as an Executive II for the HIV, STD, and Hepatitis Section of the Missouri Department of Health and Senior Services; as a Deputy Clerk for the Supreme Court of Missouri; as a Game Accounting Executive, Administrative Office Assistant, Inside Sales Representative, and a Licensing Specialist for the Missouri Lottery. From September 1999 through December 2017.

Case Participation History

Case Number	Company	Issue	Exhibit
ER-2022-0337	Union Electric Company d/b/a Ameren Missouri	Low-Income	Rebuttal & Surrebuttal Testimony
ER-2022-0337	Union Electric Company d/b/a Ameren Missouri	Interest Calculation	Staff Report
EO-2023-0136	Union Electric Company d/b/a Ameren Missouri	Low-Income	Testimony & Rebuttal
EO-2023-0369_0370	Evergy Metro Inc. & Evergy Metro West	Low-Income	Testimony
ER-2024-0319	Union Electric Company d/b/a Ameren Missouri	Low-Income	Rebuttal
GR-2024-0369	Union Electric Company d/b/a Ameren Missouri	Low-Income	Rebuttal
ER-2024-0261	Empire District Electric Company d/b/a Liberty	Low-Income	Rebuttal