

Exhibit No. 420

Exhibit No.:
Issue(s):

420

Critical Needs Program/
Late Fees

Witness/Type of Exhibit:
Sponsoring Party:
Case No.:

Marke/Direct
Public Counsel
GR-2021-0241

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. GR-2021-0241

September 3, 2021

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DIRECT TESTIMONY
OF
GEOFF MARKE
UNION ELECTRIC COMPANY
D/B/A AMEREN MISSOURI
CASE NO. GR-2021-0241

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 Counsel),
4 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, water, and sewer 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 The purpose of my testimony is to provide support for my recommendation for a Critical Needs
13 Program consistent with the nonunanimous stipulation and agreement in Spire's most recent
14 rate case GR-2021-0108 and for an adjustment to the Company's Late Fees.

15 **II. CRITICAL NEEDS PROGRAM**

16 **Q. What is the Critical Needs Program?**

17 A. In Case No. GR-2021-0108, Legal Services of Eastern Missouri recommended the funding and
18 adoption of a pilot program modeled after Baltimore Gas & Electric's ("BG&E") Critical
19 Needs Program ("CNP"). The BG&E program recognized that there are vulnerable customers
20 who may not have the capacity to research and apply for assistance, negotiate reasonable
21 payment plans, or properly navigate the application process. Yet their circumstances make

1 them particularly vulnerable to harm if they become disconnected. In response, the CNP
2 streamlines and expedites the processes to help customers stay connected. The pilot's initial
3 goal was to implement immediate access to existing resource assistance (bill payment, repair,
4 consumer protections, etc...) to customers that seek assistance in nontraditional utility CSR
5 venues (e.g., hospitals, public and private assistance agencies, shelters, etc...). The CNP is a
6 voluntary program that trains customer "navigators," who work in nontraditional utility CSR
7 venues. The navigators utilize a simple form under a "fast-track" protocol that provides an
8 expedited process that should:

- 9 • Maintain or restore utility services
- 10 • Avoid negative impacts on residents with serious medical conditions
- 11 • Address build-up of utility bill arrears
- 12 • Provide a streamlined process to complementary services

13 **Q. Is this still a pilot program for BG&E?**

14 A. No. The program's success lead it to becoming a statutory requirement for utilities in
15 Maryland, and the service is now largely administered by the State's Social Service
16 Department with additional funding through Maryland's Fuel Fund program.

17 **Q. Wouldn't those elements (Department of Social Service and an independent funding
18 stream) be beyond the scope of the Commission's power in this case?**

19 A. They would; however, I am not suggesting anything more than what parties in Spire's recent
20 rate case agreed, which was to model the initial pilot program that BG&E produced, other than
21 for Ameren Missouri to partner with Spire and contribute an equivalent amount in funding this
22 endeavor to maximize program efficiency.

23 **Q. Do you have any additional information to share on this topic of critical needs
24 customers?**

25 A. I have spoken with BG&E representatives, and they have expressed a willingness to help
26 Ameren Missouri and interested stakeholders with the mechanics behind such a program. I
27 have also included attachments GM-2A through GM-2D, which provide more detail about the

1 Maryland program as well as sample customer consent forms (both paper and internet). I
2 recommend program financing of up to \$100K annually (split 50/50 between
3 ratepayers/shareholders) for the three-year pilot program, with regular meetings from
4 interested stakeholders in the Keeping Current collaborative to see if equivalent success can be
5 achieved for Ameren Missouri's customers as the BG&E pilot produced. Ameren Missouri's
6 outreach and community engagement is already one of the best in the state. Given the existing
7 resources, utilizing the BG&E model framework, collaborating with Spire, I believe this could
8 produce excellent results.

9 **Q. Are you making this same recommendation in Ameren Missouri's current electric rate**
10 **case ER-2021-0240?**

11 A. Yes.

12 **III. LATE FEES**

13 **Q. What are the purported benefits associated with late fees?**

14 A. The two arguments supporting the continued use of late fees include: 1.) greater revenue
15 assurance (late fees offset the revenue requirement assuming the Company is not over-
16 earning); and 2.) late fees should (theoretically) encourage timely payments.

17 **Q. Do you support late payment fees?**

18 A. No. I have not seen any evidence to support that late payment fees are an appropriate deterrent
19 to non-payment, and I believe that any additional fee added to an already financially struggling
20 customer will increase the likelihood of disconnection. I believe the threat of disconnection is
21 the primary deterrent to incentivize timely payments, and that Ameren Missouri should be
22 doing everything in its power to provide an affordable service, which should include
23 minimizing punitive charges that make it more likely for already struggling customers to fall
24 off.

1 **Q. Do you know of any Commissions that recently ordered elimination of late fees?**

2 A. Yes. The Kentucky Public Service Commission ruled against their continued use in Case No:
3 2020-00141.¹ I am also aware that many state commissions ordered suspending late fees
4 throughout the COVID-19 pandemic.

5 **Q. What is Ameren Missouri's late payment fee?**

6 A. 1.5% is added onto a customer's bill, if their bill is unpaid at the delinquent date.

7 **Q. Do you have any recommendations to modify this amount?**

8 A. I recommend that Ameren Missouri's late fees be lowered to match the short term debt
9 recommendations made by OPC witness David Murray, which is 0.25% annually. Such an
10 amount would more accurately reflect the cost of service, minimize the punitive pressure on
11 struggling customers and still incentivize timely payments by having the "threat" of late
12 payment.

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

14 A. Yes.

¹ See GM-3

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)	GR-2021-0241	Direct: Critical Needs Program / Late Fees
Union Electric Company d/b/a Ameren Missouri	OPC	ER-2021-0240	Direct: Wind Farm (High Prairie) / Plant-In-Service-Accounting / Cryptocurrency / Advertising / EEI Dues / Keeping Current / Late Fees
Working Case: FERC 2222 Regarding Participation of DER Aggregators into the RTOs	OPC	EW-2021-0267	Memo: Aggregators of Retail Customers (ARCs) for Commercial & Industrial Demand Response
Evergy Missouri West & Evergy Missouri Metro	OPC	ET-2021-0151	Rebuttal: EV subsidies and EV charging stations
Spire Missouri Inc.	OPC	GR-2021-0108	Direct: AMI, Corporate Governance: Workplace Discrimination Rebuttal: Subsidized Natural Gas Expansion / Multi-Family Pilot / Energy Efficiency / Rate Design / Low-Income Programs Surrebuttal: AMI / AMI Opt-Out / Corporate Governance: Workplace Discrimination / Propane Storage / Research and Development / Bad Debt & Uncollectable / Rate Design
Empire District Electric Company /Kansas City Power & Light & KCP&L Greater Missouri Operations Company/Union Electric Company d/b/a Ameren Missouri	OPC	EO-2020-0069 EO-2020-0068 EO-2020-0067 EO-2020-0066	Memorandum: Impact of falling energy market prices in SPP(Metro, West, and Empire specific) / Reliable Power / Additive Manufacturing ("AM" or 3D Printing") / Virtual Power Plants / Small Modular Reactors / Combustion Turbine Conversion to Combined Cycle Units / Grain Belt Express Energy / Long Duration Storage Memorandum: Response to Sierra Club's Evergy Metro and West Recommendations Memorandum: Response to Sierra Club and NRDC's Ameren Missouri Recommendations
Missouri American Water	OPC	WR-2020-0344	Direct: COVID-19 / Future Test Year/ Cost Allocation Manual and Affiliate Transaction Rules for Large Water Utilities Direct: Rate Design Surrebuttal: Policy / Future Test Year / Affiliate Transactions Rule / Consolidated

			Tariff Pricing / Rate Design / Lead Line Replacement
Evergy Missouri West & Evergy Missouri Metro	OPC	EO-2020-0227	Rebuttal: Inefficient Management / Residential Demand Response Surrebuttal: Demand Response Programs
Working Case: To consider best practices for recovery of past-due utility customer payments after the COVID-19 pandemic	OPC	AW-2020-0356	Memorandum: Response to Staff Report on COVID-19 Past-Due Utility Customer Payments
Spire Missouri Inc.	OPC	GO-2020-0416	Memorandum: Notice of prudence concerns regarding natural gas Advanced Metering Infrastructure (“AMI”) investment
Evergy Missouri West & Evergy Missouri Metro	OPC	EU-2020-0350	Rebuttal: Authorized Accounting Order for: Lost Revenues /COVID-19 Expenses / Bad Debt Expense Surrebuttal: Disconnection Moratorium / Arrearage Management Plans / Economic Relief Pilot Program / Outreach / Energy Efficiency / Administrative Procedures
Empire District Electric Company	OPC	EO-2020-0284	Memorandum: Customer Savings Plan / Stateline Combined Cycle Upgrade / DSM / COVID-19 Impact on Modeling / Executive Order on Securing the US Bulk-Power System / SPP Effective Load Carrying Capability / All-Source RFP
Evergy Missouri West	OPC	EO-2020-0281	Memorandum: Wind Power PPAs / DSM / COVID-19 Impact on Modeling / Executive Order on Securing the US Bulk-Power System / SPP Effective Load Carrying Capability / Utility-Scale Solar / All-Source RFP
Evergy Missouri Metro	OPC	EO-2020-0280	Memorandum: Wind Power PPAs / DSM / COVID-19 Impact on Modeling / Executive Order on Securing the US Bulk-Power System / SPP Effective Load Carrying Capability / Utility-Scale Solar / All-Source RFP
Empire District Electric Company	OPC	ER-2019-0374	Direct: Cost and Quality of Service, Stranded Asset, AMI/CIS deployment Rebuttal: Customer Experience / Weather Normalization Rider / Energy Efficiency / Low-Income Pilot Program Rebuttal: Class Cost of Service / Rate Design / Low Income Pilot Program

			Surrebuttal: Cost and Quality of Service / Reliability Metrics / Asbury Power Plant / Rate Design & CCOS / DSM Programs
Union Electric Company d/b/a Ameren Missouri	OPC	EA-2019-0371	Rebuttal: Solar + Storage
Union Electric Company d/b/a Ameren Missouri	OPC	ER-2019-0335	Direct: Keeping Current Bill Assistance Program Rebuttal: Smart Energy Plan, Keeping Current, Coal Power Plants, CCOS, Rate Design, Pure Power RECs Surrebuttal: Coal Power Plants
Rule Making	OPC	AW-2020-0148	Memorandum: Residential Customer Disconnections and Data Standardization Presentation: Service Disconnection Data Standardization Virtual Rulemaking Workshop
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)
Union Electric Company d/b/a Ameren Missouri	OPC	EA-2019-0309	Rebuttal: Need for the Wind Project/ Economic Valuation / Pre-Site Energy Assessment Omissions
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"
Empire District Electric Company	OPC	EO-2019-0046	Memorandum: Response to The Empire District Electric Company d/b/a Liberty Plant In Service Accounting (PISA) Report
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-2016-0285	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
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 Polices 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, Cybersecurity and Data Privacy
Kansas, Clean Energy Business Council (“CEBC”), 2020	OPC	Climate and Energy Project	Presentation: Energy Efficiency and Pay as You Save (PAYS)
Michigan State, Institute of Public Utilities, 2020	OPC	Camp NARUC: Fundamentals	Presentation: Fundamentals of Economic Regulation / Performance Base Regulation
Renew Missouri	OPC	MoBar Continued Learning Education Credit	Presentation: Regulatory Incentives and Utility Performance
Missouri Bar Association	OPC	MoBar Fall Environmental & Energy Law Committee	Presentation: The Virus, The Economy and Regulated Utility Service: An Overview of Utilities and Stakeholders Response to COVID-19 and the Recession to Date
University of Missouri and City of Columbia, MO., 2021	OPC	Advancing Renewables in the Midwest	Presentation: The Heat Is On: Demand Side Management of Urban Heat Islands
NARUC/US AID, Indonesia, Jakarta 2021	OPC	Indonesia Ministry of Energy and Mineral Resources (MEMR)	Presentation: Introduction to Tariff Setting & Review: Utility Revenue Requirement, Cost Allocation & Rate Design
Michigan State, Institute of Public Utilities, 2021	OPC	Camp NARUC: Fundamentals	Presentation: Fundamentals of Economic Regulation



Critical Medical Needs Program

Navigator Training

Navigator Training Goals

- Understand the Office of Home Energy Programs (OHEP) Critical Medical Needs Program (CMNP)
- Understand how to complete an Office of Home Energy Programs (OHEP) application
- Understand types of benefits and how they help applicants

Training Overview



1. Overview
2. Application Process
3. Income Eligibility
4. Forms and Notices
5. Next Steps



OVERVIEW

OFFICE OF HOME ENERGY PROGRAMS



OHEP Mission



Provide bill assistance to low-income households in the State of Maryland to make energy costs more affordable and to help with the prevention of loss and the restoration of home energy service.

Purpose of CMNP



The purpose of the Critical Medical Needs Program is to:

1. Reduce the barriers to the energy assistance application process for critical medically vulnerable individuals and their households in obtaining state and federal financial assistance for their electric, gas, or other energy source bills;
2. Make referrals, as necessary, to other agencies and organizations when additional resources are necessary for the continuation or restoral of energy service; and
3. Coordinate with the Department of Housing and Community Development for energy efficiency programs, and heating and cooling system repair or replacement programs.

Program Components



	Maryland Energy Assistance Program (MEAP)	Electric Universal Service Program (EUSP)	Arrearage Retirement Assistance (ARA)	Gas Arrearage Retirement Assistance (GARA)
Frequency of Grant	Annual (State fiscal year)	Annual (State fiscal year)	Every 7 years (certain exceptions may apply)	Every 7 years (certain exceptions may apply)
Grant Requirement	Account does not have to be in the Applicant's name	<ul style="list-style-type: none"> Account <u>must</u> be in the Applicant's name Requires Budget Billing 	<ul style="list-style-type: none"> Applicant <u>must</u> receive EUSP grant to be eligible Applicant must have a past-due electric balance of at least \$300 	<ul style="list-style-type: none"> Applicant <u>must</u> receive MEAP grant to be eligible Applicant must have a past-due gas balance of at least \$300
How Benefit is Applied	One-time credit to the fuel supplier	<ul style="list-style-type: none"> Pays a portion of customer's current electric bill Grant is applied in monthly credits to electric supplier* See Chapter 1.1.2 for exceptions 	<ul style="list-style-type: none"> Assists customers with large past-due electric bills, up to \$2,000 Grant is applied as a one-time credit to electric supplier 	<ul style="list-style-type: none"> Assists customers with large past-due gas bills, up to \$2,000 Grant is applied as a one-time credit to gas supplier
Funding	Federal Low Income Home Energy Assistance Program	<ul style="list-style-type: none"> Utility ratepayer fees Regional Greenhouse Initiative via Maryland Strategic Energy Investment Fund 	<ul style="list-style-type: none"> Regional Greenhouse Gas Initiative via Maryland Strategic Energy Investment Fund 	Federal Low Income Home Energy Assistance Program

Pop Quiz!



Q1. How often can an applicant receive a MEAP (heating) grant?

- A. Once every 7 years
- B. Once a year
- C. Once in a lifetime
- D. Whenever it is needed

Q2. How often can an applicant receive an arrearage grant?

- A. Once every 7 years
- B. Once a year
- C. Once in a lifetime
- D. Whenever it is needed

Benefit Determination



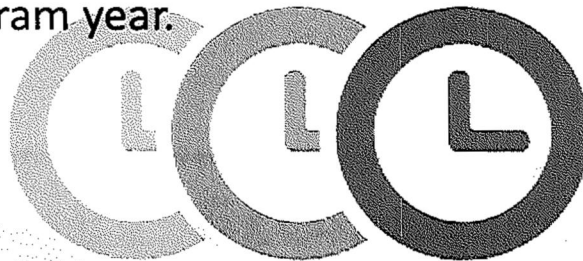
- EUSP and MEAP Benefits are determined by:
 - Household size
 - Total gross household income
 - Energy usage and heating source

- Electric and Gas Arrearage Benefits are determined by:
 - Amount past due, up to \$2,000
 - Eligible arrearage amount is confirmed with the utility company

Application Period



- One application – 4 separate benefits plus referrals to energy efficiency (DHCD) and Universal Service Protection Program (USPP)
- May receive benefits once per program year
- Program Year runs July 1st – June 30th
 - Customer applied July 5, 2020 and received benefits and then reapplies February 7, 2021. Customer's second application will be denied because they already received benefits in the same program year.
 - Customer applied March 10, 2020 and received benefits and then reapplies July 7, 2020. Customer's second application is accepted because it is in a new program year.



Application Review



- Boxes must be marked for every program for which the customer wishes to apply.
- If boxes are not marked, OHEP will verify that the customer does not want that particular benefit, which will slow the process.
- If the boxes ARE checked, OHEP will verify eligibility for that benefit.
- OHEP cannot just opt customers in to a program.
- All applications must have a signature and date.