

Exhibit No. 206

Commission Staff – Exhibit 206
Kory J. Boustead
Rebuttal Testimony
File Nos. ER-2021-0240 & GR-2021-0241

Exhibit No.:
Issue(s): Low Income Programs
Witness: Kory J. Boustead
Sponsoring Party: MoPSC Staff
Type of Exhibit: Rebuttal Testimony
Case No.: ER-2021-0240
Date Testimony Prepared: October 15, 2021

MISSOURI PUBLIC SERVICE COMMISSION

INDUSTRY ANALYSIS DIVISION

ENERGY RESOURCES DEPARTMENT

REBUTTAL TESTIMONY

OF

KORY J. BOUSTEAD

UNION ELECTRIC COMPANY

d/b/a Ameren Missouri

CASE NO. ER-2021-0240

Jefferson City, Missouri

October 2021

1 Study and Evaluation (“APPRISE”) conducted and provided recommendations to
2 Ameren Missouri for these programs.

3 **OPC Recommendations**

4 **Keeping Current**

5 Q. What recommendations does OPC support in regards to Ameren’s Keeping
6 Current and Keeping Cool Programs?

7 A. In Dr. Marke’s direct testimony he states four specific modifications from the
8 APPRISE study he would like to endorse moving forward. ¹:

9 (1) Additional populations: consider targeting customers who are formerly (or in the
10 process of no longer being) homeless.

11 (2) Minimum payments: revise the Keeping Current tariff to allow customers to receive
12 a Keeping Current benefit despite two non-payments and/or up to four payments of a minimum
13 of \$25 for up to four consecutive billing cycles.

14 (3) Non-Payment: the tariff should be modified to allow Keeping Current participants
15 to remain in the program as long as they are not terminated due to nonpayment.

16 (4) Customer Service Representative (“CSR”) Weatherization Referral: Direct Ameren
17 Missouri’s CSR’s who receive calls from customers struggling to pay bills to ask for consent
18 from that customer to forward their contact information to the relevant Community Action
19 Agency (“CAA”) so that a representative from a CAA may contact them about weatherizing
20 their home free of charge and other assistance, if eligible.

21 Q. Does Staff find the recommendations in Dr. Marke’s testimony regarding the
22 Keeping Current and Keeping Cool Programs reasonable?

¹ Direct testimony of Geoff Marke, pages 27-28.

1 A. Yes, Staff finds the recommendations from OPC reasonable.

2 **Pilot Programs**

3 Q. Does OPC make any other recommendations?

4 A. Yes, OPC has two additional recommendations:

5 (1) Re-Housing & Returning Customer Pilot Program: Conduct a three-year pilot
6 program (\$500K 50/50 ratepayer/shareholder split) that coordinates with non-profit
7 shelters and Veterans Affairs and Veteran Affairs non-profit supporting agencies in
8 clearing bad debt for former homeless customers re-housing in Ameren Missouri's
9 service territory.

10 (2) Critical Needs Pilot Program: Conduct a three-year pilot program (\$500K with
11 a 50/50 ratepayers/shareholders split) consistent with the framework originally designed
12 by BG&E known currently as the Maryland Critical Needs Program) and adopted in the
13 non-unanimous stipulation and agreement in Spire Missouri's most recent rate case.

14 Q. Does Staff oppose the Re-Housing & Returning Customer Pilot Program and the
15 Critical Needs Pilot Program?

16 A. No. Staff finds OPC's recommendation reasonable.

17 **Consumer Council of Missouri Recommendations**

18 **Keeping Current**

19 Q. What are the recommendations of Consumers Council of Missouri witness,
20 Jacqueline Hutchinson, in regards to the Keeping Current program?

21 A. In her direct testimony, Ms. Hutchinson recommends;

22 (1) an increase in program funding to at least \$5 million, shared equally by ratepayers
23 and shareholders as currently funded.

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1 (2) Revise the program to reflect recommendations² provided in the APPRISE Design
2 Study;

3 (3) Increase the eligibility from 150% federal poverty level ("FPL") to 250% FPL.

4 Q. Does Staff support the recommendation to increase the program funding to at
5 least \$5 million?

6 A. No, Staff does not support an increase in program funding at this time. In the
7 most recent Ameren Missouri Electric Case, ER-2019-0355, on March 18, 2020 the
8 Commission approved a budget increase from \$1.3 million to \$2 million, with a 50/50
9 ratepayer/shareholder funding sharing mechanism for the entire budget.³ Due to the global
10 pandemics increasing impact in the Company's service territory causing a reduction in energy
11 assistance enrollments, there was a large amount of the budget unspent and has since been
12 reallocated. Ms. Hutchinson is recommending \$5 million without the current level of funding
13 being fully expended at any point while the pandemic is still having an impact to the program.
14 In addition, there has been no analysis or study conducted to point to such a level of funding
15 being necessary and able to be spent

16 Q. Is Staff in support of the recommendation to revise the program to adopt all of
17 the recommendations laid out by the APPRISE Study?

18 A. No, Staff is not in support of adopting all recommendations by APPRISE since
19 some of the recommendations such as Administration; Additional Outreach; Intake, continue
20 to encourage in person enrollment; Recertification; Othe Eligibility requirements

² APPRISE gave 15 recommendations which are listed in the Staff Direct Report of this case, on pages 187-189.

³ ER-2019-0335 *In the Matter of Union Electric Company d/b/a Ameren Missouri's Tariffs to Increase Its Revenue for Electric Service, Corrected Non-Unanimous Stipulation and Agreement, March 2, 2020, paragraph 45. Commission Order Approving Corrected Stipulation, March 18, 2020.*

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1 (LIHEAP/LIWAP enrollment); Arrearage Forgiveness; are already in place and being carried
2 out by the enrolling agencies.

3 Q. Does Staff support the recommendation to increase the FPL from 150%
4 to 250%?

5 A. No, Staff is not in support of increasing the FPL to 250% at this time for the
6 following reasons.

7 (1) The eligibility has already been increased temporarily from 150% to 200% FPL for
8 Keeping Current, and for Keeping Cool increased temporarily from 150% to 250% FPL
9 during COVID 19 until December 31, 2021. The temporary increase will allow assessment
10 of how effective the temporary increase was in enrollment of customers to the program
11 and if it should be a permanent increase moving forward. (2) It should also be noted that
12 in the APPRISE study listed under Best Practices section, APPRISE states:

13 "Most programs reviewed use 150 percent of the Federal Poverty Level (FPL)
14 as an eligibility guideline. Some programs use a percent of the state median
15 income or base eligibility on LIHEAP."

- 16 • Lower Income Eligibility Level: Lower income standards will ensure
17 that the households with the greatest need for assistance benefit from the
18 program. However, those with the lowest incomes may still face
19 challenges with their bills and may struggle to meet program
20 requirements for consistent bill payment.
- 21 • Higher Income Eligibility: A higher income guideline will allow more
22 households to participate. However, this may reduce the amount of
23 benefits that are available to more in-need, lower-income customers.
- 24 • LIHEAP Eligibility: Basing program eligibility on LIHEAP
25 participation can make it easier to enroll participants, as their income
26 eligibility has already been verified. However, it can restrict
27 participation to customers who are already receiving assistance.

28 The goal is to ensure that the households with the greatest need for assistance benefit from the
29 program. That cannot always be achieved by just increasing the eligibility thresholds.

1 Q. Does Ms. Hutchinson give other recommendations in regards to low-income
2 programs/needs?

3 A. Yes, Ms. Hutchinson has two additional recommendations:

4 (1) Target funds and services for homeless individuals seeking to move to housing, and
5 allow them to receive benefits of the program to attain utility service.

6 (2) Develop a transparent and more easily accessible medical registry program for
7 Ameren Missouri customers, targeting medically at risk customers and those with
8 medical devices.

9 Q. Does Staff find that these recommendations reasonable?

10 A. Yes, both of the recommendations are in-line with the pilot-programs
11 recommended by OPC.

12 Q. Does this conclude your rebuttal testimony?

13 A. Yes.

BEFORE THE PUBLIC SERVICE COMMISSION

OF THE STATE OF MISSOURI

In the Matter of Union Electric Company)
d/b/a Ameren Missouri's Tariffs to Adjust Its) Case No. ER-2021-0240
Revenues for Electric Service)

AFFIDAVIT OF KORY J. BOUSTEAD

STATE OF MISSOURI)
) ss.
COUNTY OF COLE)

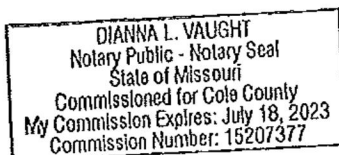
COMES NOW KORY J. BOUSTEAD and on her oath declares that she is of sound mind and lawful age; that she contributed to the foregoing *Rebuttal Testimony of Kory J. Boustead*; and that the same is true and correct according to her best knowledge and belief.

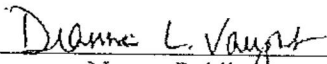
Further the Affiant sayeth not.


KORY J. BOUSTEAD

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 13th day of October 2021.




Notary Public