

Exhibit No: _____
Issue(s):

- Energy Bill Affordability
- Keeping Current Program
- Fixed Customer Charge
- Reconnect/Late Fees
- Protections for Low-Income and Medically Vulnerable Customers

Sponsoring Party:
Consumers Council of Missouri

SURREBUTTAL TESTIMONY OF
JACQUELINE A. HUTCHINSON

Case No. ER-2021-240

Filed: November 4, 2021

1 **Q. PLEASE STATE YOUR NAME, OCCUPATION, AND BUSINESS ADDRESS.**

2 My name is Jacqueline A. Hutchinson, and I am the Executive Director of the
3 Consumers Council of Missouri, Located at 3407 S. Jefferson St. Louis MO
4 63118.

5 **Q. ARE YOU THE SAME JACQUELINE HUTCHINSON WHO PROVIDED DIRECT**
6 **TESTIMONY IN THIS CASE?**

7 A. Yes.

8 **Q. FOR WHOM ARE YOU PROVIDING TESTIMONY IN THIS PROCEDURE?**

9 A. The Consumers Council of Missouri (Consumers Council), a nonpartisan,
10 nonprofit corporation that is dedicated to educating and empowering consumers
11 statewide and to advocating for their interests. After serving several years as
12 Board President, I assumed the role of Executive Director of the organization in
13 2020.

14 **Q. WHAT COMMENTS DO YOU OFFER TO THE TESTIMONY OF GEOFF**
15 **MARKE REGARDING THE UTILITY'S COVID RESPONSE?**

16 A. I concur with the rebuttal testimony of Geoff Marke, page 2-8 - Covid Response.
17 I concur with the Covid-19 data and analysis. The Covid-19 impact on Missouri
18 families. Consumers Council also agrees that Ameren Missouri's actions helped
19 numerous customers afford Ameren's electric service during the pandemic.

1 I would add that Ameren Missouri has also worked closely with Consumers
2 Council of Missouri, Community Action Agencies and a host of other service
3 providers in its outreach and networking efforts. Ameren Missouri took
4 recommendations from Consumers Council and other community groups to
5 expand the eligibility for the Keeping Current program to serve additional
6 vulnerable customers. Their reallocation of funds, discernments, and reallocation
7 of Keeping Current funds from previous cases, allowed community partners to
8 serve vulnerable customers who may have been subject to increased health and
9 safety risks, if they had been disconnected during the past year. Consumers
10 Council appreciates the outreach efforts of Ameren during that time.

11 **Q. WHAT COMMENTS DO YOU OFFER TO THE REBUTTAL TESTIMONY OF**
12 **GEOFF MARKE REGARDING CUSTOMER AFFORDABILITY?**

13 A. I concur with the recommendations made by Geoff Marke, of the
14 Office of the Public Counsel (OPC) in section III of his rebuttal testimony, pages
15 8-14.

16 I would like to expand on comments pertaining to the rate shock that will be
17 caused by a 12% increase in rates as proposed by Ameren Missouri. Consumers
18 Council's recommendation is there should be no rate increase on residential
19 customers at this time.

20 There is an affordability crisis with utility bills in Missouri. Low-income
21 households pay an average of 46% of their gross income towards housing and
22 energy costs. However, households at 50% of the Federal Poverty Guideline

1 may pay up to 54% of their income just on energy bills. Utility service is essential
2 to public health for all, but particularly vulnerable are the elderly and children
3 under five, not to mention the risk to those with serious medical needs and those
4 who depend upon the use of electric medical devices at home for their continued
5 health. The threat of utility disconnection is a constant threat for these groups,
6 and the consequences of losing these essential services can be deadly.
7 Exposure to extreme heat and extreme cold with utility service causes tragedies
8 every year. Death from heat exposure, and serious medical problems related to
9 extreme heat, pose a particularly serious problem for older individuals. Despite
10 these dangers, automated and remote disconnection technology has actually led
11 to an increased level of utility disconnections in Missouri, and it has been difficult
12 for social services and health officials to keep up.

13 The connection between energy burdens and health disparities is an
14 underexplored area of research. But energy burden, which can be a sign of
15 energy poverty (insufficient wealth to provide adequate access to energy), is
16 clearly tied to debt and financial difficulties. The Debt Stress Index, created by
17 researchers at Ohio State University during the 2008 recession, has found that
18 stress related to debt and strained finances is positively associated with
19 migraines, back problems, ulcers, heart problems, and other debilitating
20 conditions. Among those with a household income of less than \$50K, 73% report
21 that money is a significant source of stress (Stress in America 2020, report from
22 the American Psychological Association).

1 High energy burden and the inability to pay utility bills is not the only source of
2 financial stress and its negative health outcomes, but it is a significant and
3 repetitive source of stress for those with low incomes.

4 **Q. WHAT COMMENTS DO YOU OFFER TO THE TESTIMONY OF GEOFF**
5 **MARKE REGARDING RESIDENTIAL RATE DESIGN?**

6 A. I concur with the recommendation contained in the rebuttal testimony of Geoff
7 Marke, at pages 14-23.

8 Consumers Council agrees that there should be no increase in the fixed monthly
9 customer charge for residential customers, recommends that it remain at \$9.00
10 dollars.

11 According to a September 2021 article by the National Consumer Law Center,
12 titled *High Utility Fixed Charges Harm Low Income, Elders and Households of*
13 *Color*, rate design that focuses on increasing fixed charges on all customers' bills
14 penalizes low-income customers within the rate class and undermines any
15 consumers' ability to control the cost of utility service through energy efficiency or
16 conservation:

17 "Electric and natural gas utilities are undergoing sweeping change. Yet, home
18 energy service remains a basic necessity of life. As utility industry technologies
19 and economics change, rates, consumer protection policies, energy efficiency,
20 and affordable payment programs must be designed to ensure that low-income

1 home energy security is enhanced. Utility rates should emphasize 'volumetric'
2 charges rather than flat, fixed charges and fees. Utility rates should be inclining."¹

3 Additionally, Consumers Council agrees that all of Ameren Missouri's reconnect
4 charges, collection trip charges, and late fees should be eliminated.

5

6 **Q. WHAT COMMENTS DO YOU OFFER TO THE REBUTTAL TESTIMONY OF**
7 **GEOFF MARKE REGARDING THE ALUMINUM SMELTER RATE, THE**
8 **DECOUPLING TRACKER, AND THE COST OF SERVICE STUDY?**
9

10 A. I understand and support the positions of Geoff Marke on these issues, on pages
11 23-27 of his rebuttal testimony.

12

13 **Q. WHAT COMMENTS DO YOU OFFER IN RESPONSE TO THE REBUTTAL**
14 **TESTIMONY OF GEOFF MARKE REGARDING AMEREN MISSOURI'S LOW-**
15 **INCOME PROGRAMS?**

16 A. I concur with the comments of Geoff Marke in support of the position of
17 Consumers Council of Missouri.

18 Additionally, increasing inflation and the increasing cost of gas and fuel oil this
19 winter will impact families at higher percentage of poverty, who may not have
20 needed assistance in the past. This potential increase in customers in need of
21 assistance makes our request for increase income eligibility and increased
22 funding more important to protecting the health and safety of families in Missouri.

23

¹ Ibid., National Consumer Law Center, September 2021.

1 Consumers Council reaffirms its recommendations to modify the Keeping
2 Current Program as follows:

- 3 1. Increased funding of the Ameren MO Keeping Current/Keeping Cool
4 Program to at least \$5 million, which would be shared equally by the
5 ratepayers and shareholders, consistent with past precedent.
- 6 2. Revise the Keeping Current program to reflect recommendations
7 provided in the APPRISE Design Study that was commissioned by
8 Ameren Mo and the collaborative group. (Direct Testimony Attachment
9 JAH-3).
- 10 3. Target funds and services for homeless individuals seeking to move to
11 housing, allowing those individuals to receive bad debt forgiveness and
12 to receive other benefits from Keeping Current/Keeping Cool program
13 that allow them equitable access to utility services.
- 14
- 15 4. Develop a transparent and more easily accessible medical registry
16 program for Ameren Missouri customers, targeting medically at-risk
17 customers and those with medical devices.
- 18 5. Eliminate late fees, collection fees, disconnect and reconnect fees.
- 19
- 20 6. Do not increase the current residential fixed charge of \$9.00. Fixed
21 rates are regressive and disproportionately impact low-income families
22 especially the elderly living on fixed income.
- 23

1 1 **Q. WHAT COMMENTS DO YOU OFFER TO THE TESTIMONY OF GEOFF**
2 **MARKE REGARDING COMMUNITY SOLAR ISSUES?**

3 I concur with the comments of Geoff Marke, OPC related to changes to the
4 Community Solar program.

5 Additionally, Consumers Council believes that the Community Solar Program
6 should be implemented equitably among all Ameren Missouri Customers,
7 including low-income, African Americans, Latino, and other communities of color.

8 It should also be inclusive of low-income inner-city neighborhoods, and rural
9 areas. We also ask that there be data transparency, demographic data collected
10 and released publicly on program participants. There should also be provisions
11 for outreach and engagement with existing and new community partners
12 interested in an equitable distribution of this solar program.

13 According to a 2019 *Yale Environmental 360* article, less than half of U.S.
14 community solar projects have any participation from low-income households. Of
15 projects that do include lower-earning families, only about 5 percent involve a
16 sizable share, or more than 10 percent, according to a November 2018 survey.

17 In New York state, a new initiative will cover the enrollment fees and other costs
18 for 7,000 low-income households to join community solar projects. The New York
19 State Energy Research and Development Authority recently awarded contracts
20 for nine community solar projects with a combined capacity of 26.4 megawatts,
21 one-third of which will be reserved for cost-free subscriptions.

22

1 “For equity reasons... there’s a basic desire to use community solar as a way to
2 reach groups that wouldn’t otherwise participate in solar,” said Kenneth
3 Gillingham, associate professor of environmental and energy economics at Yale
4 University’s School of Forestry & Environmental Studies. “There is still a market
5 that’s untapped in the low- to moderate-income communities.”²
6

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8 solar projects have any participation from low-income households. Of projects that do
9 include lower-earning families, only about 5 percent involve a sizable share, or more
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13 Energy Research and Development Authority recently awarded contracts for nine
14 community solar projects with a combined capacity of 26.4 megawatts, one-third of
15 which will be reserved for cost-free subscriptions.
16

17 **Q. DO YOU HAVE OTHER SURREBUTTAL COMMENTS?**

18 A. Yes, I would like to respond in more detail I to rebuttal comments of Geoff Marke,
19 OPC, with regard to testimony of Warren Wood, Ameren Missouri, relating to
20 affordability.
21

² April 4, 2019 *Yale Environmental E360* article, p. 3.

1 **Q. WHAT ARE THE TREATS TO HEALTH AND SAFETY FROM LOSS OF**
2 **ELECTRIC SERVICE?**

3 A. Electricity service is widely considered to be a necessity of life and is essential to
4 public health and safety. In addition to providing everyday functions, secure,
5 reliable electricity service is critical in avoiding health and safety risks by providing
6 safe lighting, heat,³ cooling, power for medical devices, refrigeration of food and
7 medications, and fuel for electric cooking appliances and electrically heated hot
8 water.

9 Elevated rates of low-income service disconnections and bill payment pressures
10 pose a threat to the health and safety of customers as well as the communities in
11 which we live.

12 **Q. HOW DO LOW-INCOME HOUSEHOLDS BALANCE RETAINING HOME**
13 **ENERGY SERVICE WITH PAYING FOR OTHER BASIC NECESSITIES?**

14 A. The National Energy Assistance Directors' Association's ("NEADA") *National*
15 *Energy Assistance Survey* outlines the steps that many individuals and families
16 must take in order to afford basic utility services, often at a risk to their own
17 health.⁴ The NEADA survey includes households that received assistance from
18 LIHEAP. In most states, this includes homes earning at or below 150% of the
19 federal poverty level, but in some states includes those earning 60% or less of the
20 state median income, or those enrolled in programs such as Temporary
21 Assistance for Needy Families, food stamps, Social Security Insurance, or similar

³ Electricity is required for electric resistance space heating and to operate a boiler or furnace fueled by natural gas or heating oil.

⁴ National Energy Assistance Directors' Association, *National Energy Assistance Survey* (Nov. 2011), available at http://neada.org/wp-content/uploads/2013/05/NEA_Survey_Nov11.pdf.

1 assistance.⁵ The NEADA survey found that in vulnerable homes, “[b]ecause of the
2 difficulty they faced in paying their utility bills as many as 37% went without
3 medical or dental care, and 34% did not fill a prescription or took less than their full
4 dose of prescribed medication.”⁶ Many individuals reported making difficult or even
5 dangerous decisions when addressing unaffordable energy costs: 39% closed off
6 part of their home; 23% kept the home at a temperature they felt was unsafe or
7 unhealthy; 21% left their home for part of the day; 33% used their kitchen stove or
8 oven to provide heat; and 24% went without food for at least one day.⁷

9 **Q. WHAT HARM MAY OCCUR WHEN A HOUSEHOLD EXPERIENCES LOSS OF**
10 **HOME ENERGY SERVICE?**

11 A. As noted in a report from AARP and others, it is common for a household that is
12 denied electricity to turn to alternative and often dangerous means of providing
13 light and heat in the home There are instances reported every year of the
14 deaths of children and adults due to the use of a candle in a dwelling without
15 electricity or heat.”⁸

16 When candles are used for light in the absence of electricity, there is additional risk
17 of fatal fire, according to the National Fire Protection Association (“NFPA”).⁹ An

⁵ National Energy Assistance Directors’ Association, *2009 National Energy Assistance Survey* (Apr. 2010), at 1-2, available at: http://neada.org/wp-content/uploads/2013/03/2010-04-19NEADA_2009_Survey_Report.pdf.

⁶ *Id.* at 2.

⁷ *Id.* at 5 (Table II).

⁸ AARP, National Consumer Law Center, National Association of State Utility Consumer Advtes, Consumers Union, and Public Citizen, *The Need for Essential Consumer Protections: Smart Metering Proposals and the Move to Time-Based Pricing* (Aug. 2010), at 17, available at http://energy.gov/sites/prod/files/oeprod/DocumentsandMedia/NASUCA_Smart_Meter_White_Paper.pdf.

⁹ In a report entitled “Home Candle Fires,” NFPA reviewed fire service reports and news clips about 117 identified fatal home candle fires in 2005 - 2010 that resulted in a total of 177 civilian fire deaths. Candles were used for light in the absence of power in 30, or one-quarter (26%), of these fires and in 60, or one-

1 example of fatalities caused by a candle fire after a utility shut-off was the case of
2 Tashika Turner, who lost three of her young children in a candle fire in New York in
3 October, 2013, one day after her electric utility disconnected service for non-
4 payment.¹⁰

5 In addition to safe lighting, electric service is required to operate most indoor
6 cooling and heating equipment. Loss of such equipment can have fatal
7 consequences. Extreme heat leads to deaths and illnesses that are preventable
8 when people are able to stay cool indoors. From 1979 through 2003, excessive
9 heat exposure caused at least 8,000 deaths in the United States.¹¹ In 2001, 300
10 deaths in the United States were attributed to excessive heat exposure.¹²
11 According to the US Department of Health and Human Services, Centers for
12 Disease Control and Prevention, “air conditioning is the strongest protective factor
13 against heat-related illness.”¹³ In cold weather, young children and the elderly are
14 particularly at risk for cold-related illness or death.¹⁴ Extreme heat is particularly
15 dangerous for the elderly, the very young, and those with chronic health
16 conditions.¹⁵

third (34%), of the associated deaths. Ahrens, Mary, “Home Candle Fires,” National Fire Protection Association, December 2015, p. iv.

¹⁰ See, e.g. CNN, “Official: 3 children die in Bronx fire after candle lit,”
<http://www.cnn.com/2013/10/26/us/bronx-deadly-fire>.

¹¹ National Weather Service, National Oceanic and Atmospheric Administration,
https://www.weather.gov/arx/heatindex_climatology

¹² Central Plains Area Agency on Aging, *Avoid Hot Weather Health Emergencies*, (July 20, 2011),
accessible at: <http://www.cpaaa.org/news-events/2011/7/20/avoid-hot-weather-health-emergencies.html>.

¹³ Centers for Disease Control and Prevention, <https://www.cdc.gov/disasters/extremeheat/faq.html>.

¹⁴ U.S. National Institutes of Health, National Institute on Aging, *Hypothermia: A Cold Weather Risk for Older People*, Press Release (Jan. 16, 2009), available at <https://www.nih.gov/news-events/news-releases/hypothermia-cold-weather-risk-older-people>.

¹⁵ U.S. Centers for Disease Control and Prevention, *Extreme Heat Prevention Guide*, available at https://www.cdc.gov/disasters/extremeheat/heat_guide.html.

1 Loss of electric service also makes it difficult to manage chronic health conditions.
2 In a 2007 report entitled “Unhealthy Consequences: Energy Costs and Child
3 Health: A Child Health Impact Assessment of Energy Costs and the Low-Income
4 Home Energy Assistance Program,” researchers identified effects of high energy
5 bills and utility disconnections on health and safety. A key finding of the report is
6 that “[i]n addition to imposing general hardship, disconnected utilities make it
7 difficult to manage chronic conditions such as asthma or diabetes, which require
8 electricity to operate medical equipment or to refrigerate medications, such as
9 insulin.”¹⁶

10 Utility shutoffs are widely recognized grounds justifying the termination of rental
11 leases.¹⁷ Low-income households fortunate enough to have secured limited
12 federally subsidized housing benefits are particularly at risk, as a utility service
13 shut-off constitutes grounds for eviction and the loss of the subsidy altogether.¹⁸ In
14 addition, loss of essential utility service results in other costs to the consumer,
15 including spoiled food, lost wages, and the like; as well as other costs to society,
16 such as hospital room emergency care, other health care costs, and credit and
17 collection costs.¹⁹

¹⁶ Smith, Lauren A., et al., “Unhealthy Consequences: Energy Costs and Child Health: A Child Health Impact Assessment of Energy Costs and the Low-Income Home Energy Assistance Program,” Child Health Impact Working Group, April 2007, p. 7.

¹⁷ See, e.g. *Long Drive Apts. V. Parker*, 421 S.E.2d 631 (N.C. App. 1992) (affirming trial court ruling that tenant had materially breached the lease by allowing the electricity in her apartment to be cut off during periods of freezing temperatures.)

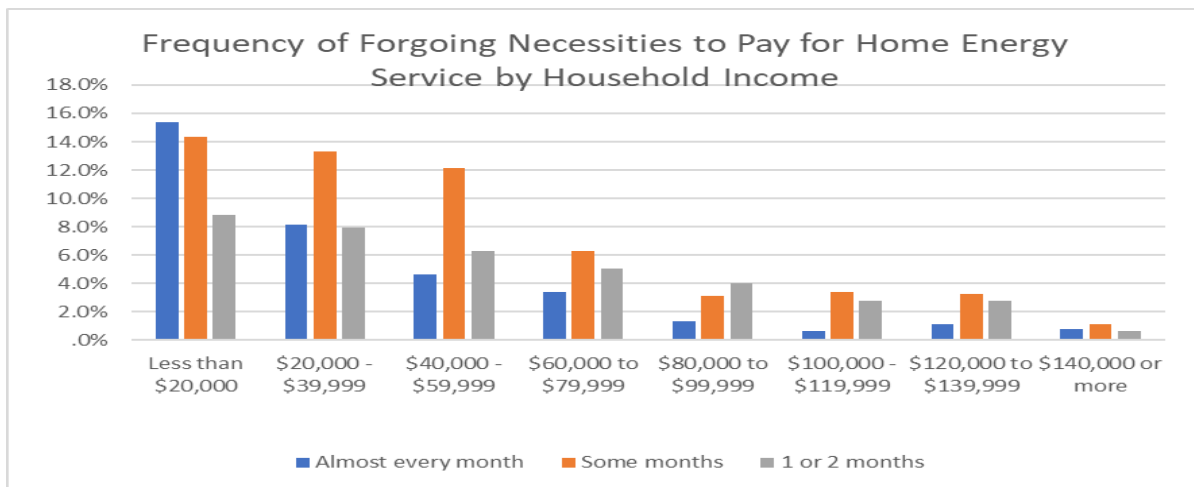
¹⁸ See, e.g. *Crochet v. Housing Authority of City of Tampa*, 37 F.3d 607, 613 (11th Cir. 1994) (referencing provision of public housing authority lease requiring tenants to maintain utility service as a condition of residency).

¹⁹ National Association of State Utility Consumer Advocates, Encouraging State Legislatures and State Public Utility Commissions to Institute Programs to Reduce the Incidence of Disconnection of Residential Gas and Electric Service Based on Nonpayment (June 28, 2011), available at <https://nasuca.org/encouraging-state-legislatures-andstate-public-utility-commissions-to-institute->

1 It is widely known that low-income households are more likely than those with
 2 higher incomes to maintain unhealthy indoor temperatures or forgo other basic
 3 necessities, such as food and medicine, to stay connected to utility service.
 4 Following is a graph constructed using microdata from the most recent U.S.
 5 Department of Energy/Energy Information Administration Residential Energy
 6 Consumption Survey.²⁰

7 The graph depicts the relationship between household income and the frequency
 8 of foregoing necessities:

9 Figure 1



10
 11
 12 In short, despite the rapid changes in energy and utility economics and
 13 technologies, affordable access to service remains a basic necessity of life.

programs-to-reduce-the-incidence-of-disconnection-of-residential-gasand-electric-service-based-on-nonpayment-2011-01/.

²⁰ Source: US DOE/EIA 2015 Residential Energy Consumption Survey microdata (<https://www.eia.gov/consumption/residential/data/2015/index.php?view=microdata>).

1 I therefore conclude that Consumers Council has a valid concern about
2 affordability, and the health and safety of Ameren Missouri vulnerable customers.
3 All recommendations made by Consumers Council and OPC in regard to
4 affordability should be strongly considered for adoption.

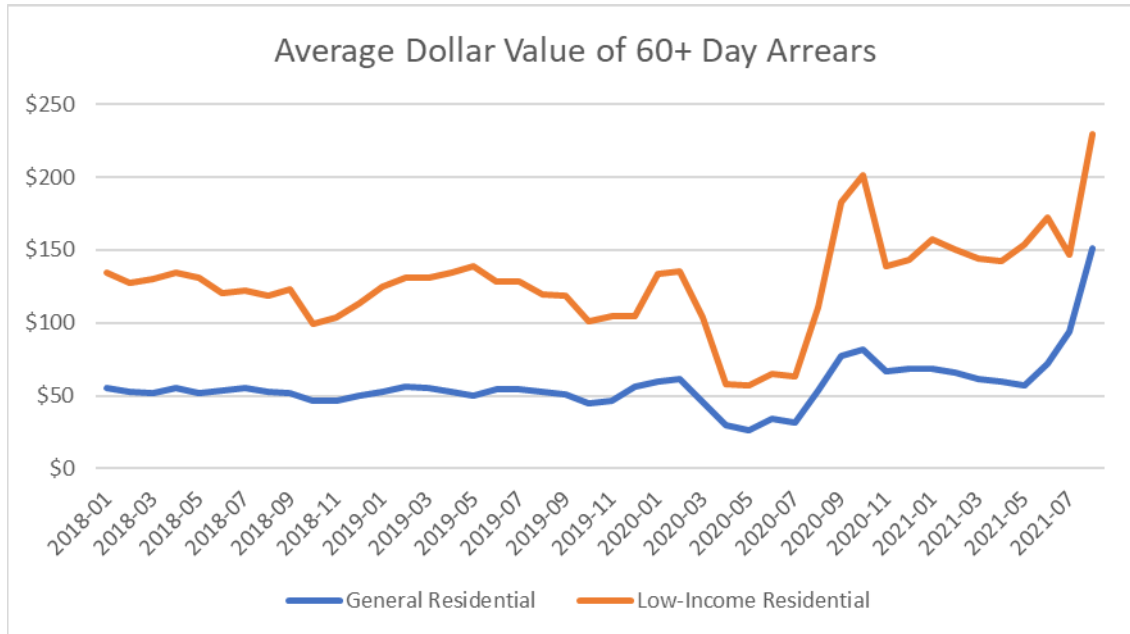
5 **Q. PLEASE ILLUSTRATE SOME OF THE CREDIT AND COLLECTIONS**
6 **CHALLENGES FACED BY AMEREN'S LOW-INCOME RESIDENTIAL**
7 **CUSTOMERS.**

8 A. Following is a depiction of the utility affordability challenges faced by Ameren's
9 low-low-income and "hardship" customers. The graphs below demonstrate that
10 Ameren Missouri's low-income customers carry past due account balances at
11 much higher dollar levels than "general residential" customers who have not been
12 identified by the Company as having income that would qualify them to participate
13 in LIHEAP or other means-tested energy assistance programs. Further, data
14 provided in response to CCM's discovery requests show that low-income electricity
15 customers are sent disconnection notices and experience involuntary loss of
16 service at much higher rates than their higher-income counterparts.

17 The chart below, based on Ameren's responses to CCM's discovery requests,
18 shows the gap in the average arrearage balance between general residential
19 customers and identified low-income customers. In fact, the average low-income
20 arrearage balance from January 2018 through August 2021 was over twice as high
21 as the average balance carried by general residential customers in serious arrears.
22 These higher average balances flag the need for enhanced affordability

1 programming in the Ameren service territory to protect vulnerable customers and
 2 other ratepayers from the ill-effects of past due accounts.

3 *Figure 2*

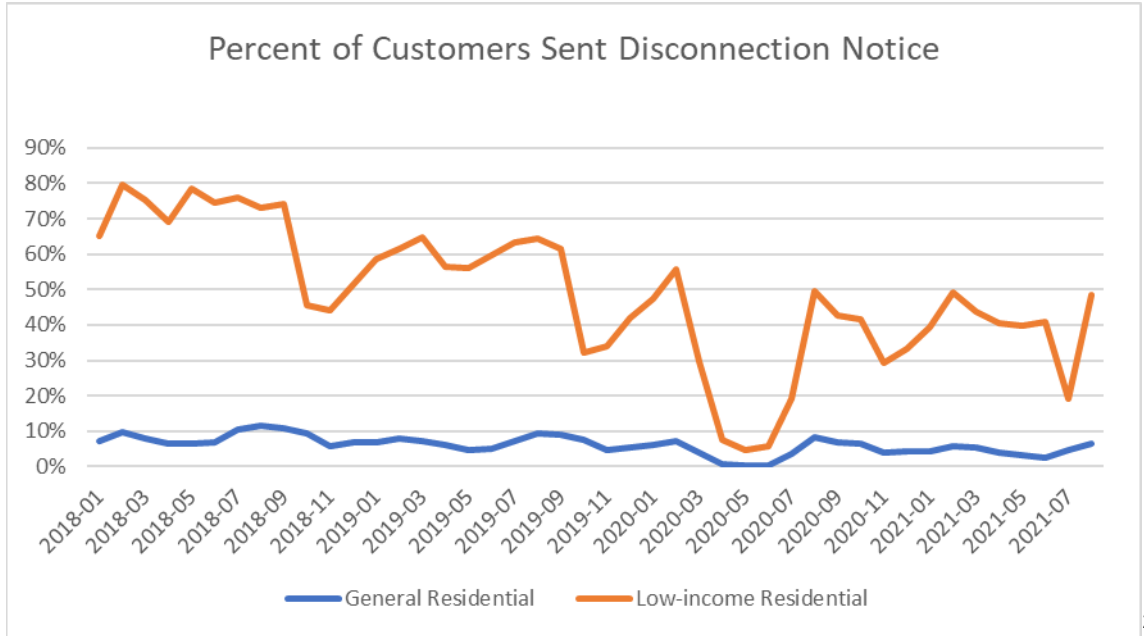


4
 5 Not only do Ameren’s low-income customers carry average arrearage balances
 6 that much higher than general residential customers, but they are also more
 7 frequently sent disconnection notices. These notices generally are the final or
 8 near-final step in the credit and collections process before the customer
 9 experiences an unwanted, and often dangerous loss of essential electric utility
 10 service. Figure 2, below demonstrates that while general residential disconnection
 11 notice rates have hovered in the range of seven percent since early 2018, 50
 12 percent to 80 percent of Ameren’s low-income customers were sent disconnection
 13 notices during most months during the period we reviewed. There was a
 14 temporary reduction in low-income disconnection notices during the height of the

²¹ Source: Data request responses to Ameren-CCM-2-d-i and Ameren-CCM-3-f-i.

1 COVID-19 pandemic, but more recent data show that the notice rate is once again
 2 on the rise.

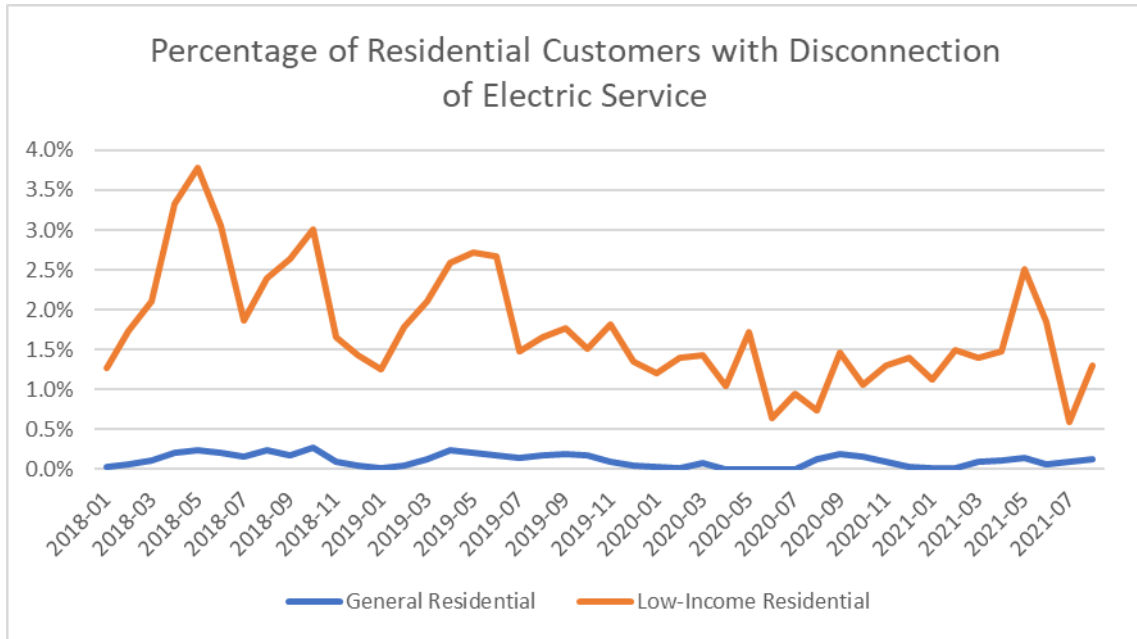
3 *Figure 3*



4
 5
 6 Based on the foregoing, it is not surprising to learn that Ameren’s low-income customers
 7 experience unwelcome loss of home electricity service at rates that far exceed those of
 8 general residential customers. The chart below clearly illustrates this dynamic.

²² Source: Data request responses to Ameren-CCM-2.q and Ameren-CCM-3-s.

1 *Figure 4*



2 23

3 Figure 4 shows that Ameren’s identified low-income customers lose access to
 4 essential electricity service at a far higher rate than general residential customers.
 5 This disparity raises profound equity concern and highlights the need to enhance
 6 the Keeping Current program.

7 **Q. DO YOU HAVE OTHER SURREBUTTAL COMMENTS?**

8 A. Yes, I would like to respond to the rebuttal testimony of Paige Shelby, Ameren
 9 Missouri, in regard to her rebuttal on the Keeping Current Program.

10 **Q. WHAT IS YOUR RESPONSE TO THE COMMENTS OF PAIGE SHELBY IN**
 11 **REBUTTAL REGARDING THE KEEPING CURRENT PROGRAM?**

12 Consumers Council acknowledges and supports the recommendation of Paige
 13 Shelby, Ameren Missouri to increase the Keeping Current income guidelines to
 14 300 percent of poverty. This increase would allow to serve many new vulnerable

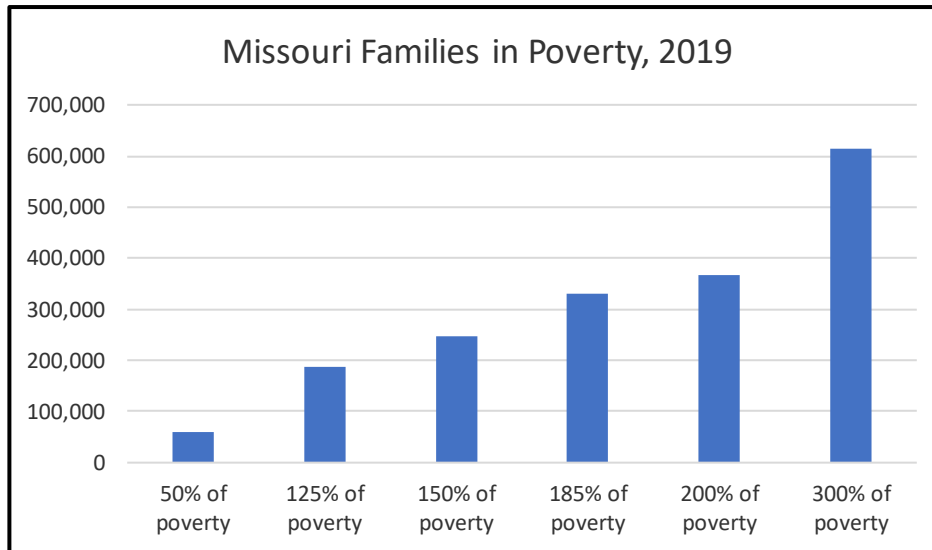
²³ Source: Data request responses to Ameren-CCM-2.r and CCM-3.t.

1 customers who may not be eligible for other forms of assistance. Below are
2 charts, based on 2019 census data, that reflect the potential numbers of eligible
3 customers. Although these number reflect all Missouri families, they can be
4 extrapolated to reflect those in the Ameren Missouri service area.

5

State of Missouri–HOUSEHOLDS

50% of poverty	57,783
125% of poverty	186,730
150% of poverty	247,232
185% of poverty	329,465
200% of poverty	367,826
300% of poverty	614,362



6

7

1 **Q. WHAT ARE THE COMMENTS OF PAIGE SHELBY IN REBUTTAL TO WHICH**
2 **YOU WOULD LIKE TO RESPOND?**

3 A. Ms. Shelby's rebuttal testimony states:

4 "On October 5th, Ameren Missouri announced an additional \$1.5 million for
5 Clean Slate 2021, a program designed to bridge customers to Keeping Current.
6 This includes \$1.3 million approved by the Commission in the Unanimous
7 Stipulation and Agreement Regarding Keeping Current Funds and Motion for
8 Expedited Treatment, File No. ER-2019-18 0335 ("Stipulation").

9 However, these successes do not mean the Commission should increase
10 funding at this time. There are challenges with program awareness, a lack of
11 staffing for the agencies to administer the program, and a decrease in
12 applications. For those reasons, it would not be prudent to increase the funding
13 at this time. We are working to resolve these limitations. The agencies that run
14 the program had reported the need for help educating the communities about this
15 program that was addressed in the Stipulation and, as a result, Ameren Missouri
16 provided \$150,000 to fund a Keeping Current program manager for two years.
17 This program manager will focus on outreach and publicity around Keeping
18 Current, including outreach to specific groups such as landlords, homeless to
19 housing case managers, and local public health agencies. An additional
20 \$150,000 will be distributed to Keeping Current agencies for overhead and
21 expenses related to administering the Keeping Current program. Consideration
22 for future funding increases can be based on the results of these investments.
23 Ameren Missouri would support an increase in eligibility to 300% of the federal

1 poverty level, with the approval of the Keeping Current Collaborative and the
2 Commission. Additionally, Ameren Missouri recommends increasing income
3 eligibility for Keeping Cool to 300% of the federal poverty level to create a
4 differentiator and allow for low to moderate income retirees, like retired teachers,
5 to qualify for Keeping Cool. Ameren Missouri intends to discuss this with the
6 Keeping Current Collaborative and bring it to the Commission for approval as is
7 appropriate.”

8 **Q. WHAT IS YOUR RESPONSE TO THESE COMMENTS?**

9 A. In response to the \$1.5 million allocated for the Clean Slate Program, funding for
10 a Keeping Current Manager, and allocation of administrative funds to Keeping
11 Current agencies, I would like to clarify, to my knowledge, these were not new
12 funds. The funds allocated throughout this settlement were left over fund from the
13 previous Keeping Current tariff. While Consumers Council was very pleased to
14 have the funds reallocated in the manner that they were utilized, I would like to
15 clarify that they were not new funds for Clean Slate.

16 **Q. WHAT ARE YOUR COMMENTS TO THE INABILITY TO SPEND ALL**
17 **KEEPING CURRENT FUNDS IN THE PAST YEAR?**

18 A. There were several reasons that funds were left over this year, the biggest one
19 being the onset of COVID-19 and many agencies and businesses being closed.
20 Another reason was the influx of temporary funds in response to COVID-19 that
21 will not be available in the coming years. These anomalies should not be
22 considered as reason not to increase Keeping Current funding going forward.

1 **Q. DO YOU HAVE OTHER COMMENTS IN REGARD TO PAIGE SHELBY'S**
2 **REBUTTAL COMMENTS?**

3 A. Yes, I believe that all other comments made by Ms. Shelby in rebuttal to my
4 direct testimony should be taken up by the Keeping Current Collaborative. I also
5 believe that that collaborative should be expanded to include a non-profit
6 representative of a health care coalition, and homeless services continuum of
7 care member.

8 **Q. DOES THIS CONCLUDE YOUR SURREBUTTAL TESTIMONY?**

9 A. Yes.

**BEFORE THE PUBLIC SERVICE COMMISSION
OF THE STATE OF MISSOURI**

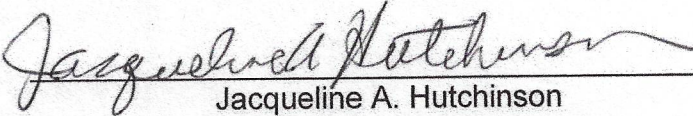
In the Matter of Union Electric Company)
d/b/a Ameren Missouri's Tariffs to Adjust its)
Revenues for Electric Service.)

Case No. ER-2021-0240

AFFIDAVIT OF JACQUELINE A. HUTCHINSON

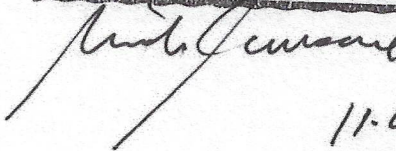
I, the undersigned, being duly sworn, ^{Surrebutta} states that my name is Jacqueline A. Hutchinson and that the foregoing ~~Direct~~ Testimony of Jacqueline A. Hutchinson, including attachments, was prepared by me on behalf of the Consumers Council of Missouri. This testimony was prepared in written form for the purpose of its introduction into evidence in the above utility case at the Missouri Public Service Commission.

I hereby swear and affirm that the attached testimony is true and correct to my best knowledge, information, and belief, and I adopt said testimony as if it were given under oath in a formal hearing.


Jacqueline A. Hutchinson

Subscribed before me on this 4th day of November, 2021:




11-4-21