

Case No. 2008-0318
Responses to AmerenUE's First Set of Data Requests to AARP
Responses Prepared by John G. Howat
Date: November 19, 2008

Company Exhibit No. 74
Case No(s). GR-2008-0318
Date 12-1-08 Rptr. pp

UE-AARP 01 – Please provide a list of all written testimony Mr. Howat has filed in utility cases before state or federal regulatory agencies.

Response: Please see the attached list.

UE-AARP 02 – Please provide a copy of all testimony Mr. Howat has given on the topic of hot weather bill credits for low-income individuals.

Response: This is the first proceeding in which Mr. Howat has testified on the topic of hot weather bill credits. To the best of Mr. Howat's knowledge, the approach proposed by AARP in this case represents an innovation that has not been implemented previously.

UE-AARP 03 – Has Mr. Howat or anyone at his organization testified in support of a program similar to the one he is proposing in this case? If so, please identify the testimony and provide a copy.

Response: See response to UE-AARP 02.

UE-AARP 04 – Does Mr. Howat know of any utility which offers a program similar to the one he is proposing in this case? If yes, please provide the name of the utility, the name of the program, the date the program began, the date the program ended (if it is no longer available) and a copy of the program guidelines, tariffs or other descriptive information which is available.

Response: See response to UE-AARP 02.

UE-AARP 05 – Did Mr. Howat rely upon the experiences of any other utility in making his recommendation in this case? If so, please explain what utility and upon what specific information he relied.

Response: See response to UE-AARP 02.

UE-AARP 06 – What number of households in AmerenUE's service territory fall within 175% of federal poverty guidelines. Please provide the source for this information.

Response: Mr. Howat has not tabulated or provided an estimate of the total number of households in AmerenUE's service territory fall within 175% of federal poverty guidelines.

UE-AARP 07 – Of the households identified in your answer to UE-AARP 06, what number of households has at least one occupant aged 65 or older? Please provide the source for this information.

Response: There are an estimated 62,175 households within the Ameren UE service territory that fall within 175% of the federal poverty guidelines and that have at least one occupant aged 65 or older. See Howat Direct Testimony pp. 10 – 12 and Attachments AARP-JH-07, AARP-JH-08 and AARP-JH-09 for sources and methodology behind this estimate.

UE-AARP 08 – Of the households identified in your answer to UE-AARP 07, what number of households is located within the City of St. Louis or in Jefferson County? Please provide the source for this information.

Response: There are an estimated 13,899 households in the City of St. Louis that fall within 175% of the federal poverty guidelines and that have at least one occupant aged 65 or older. There are an estimated 3,035 households in Jefferson County that fall within 175% of the federal poverty guidelines and that have at least one occupant aged 65 or older. See Howat Direct Testimony pp. 10 – 12 and Attachments AARP-JH-07, AARP-JH-08 and AARP-JH-09 for sources and methodology behind this estimate.

UE-AARP 09 – Of the households identified in your answer to UE-AARP 06, what number of households has at least one occupant who is 2 years of age or younger? Please provide the source for this information.

Response: AARP is not in possession of the information regarding the number of households in the AmerenUE service territory with at least one occupant who is 2 years of age or younger.

UE-AARP 10 - Of the households in AmerenUE's territory with one or more occupant who is 2 years of age or younger, how many live in a household where air conditioning is available but the household chooses not to run it during periods of high heat? Please provide the source for this information.

Response: See response to UE-AARP 09.

UE-AARP 11 – Of the households identified in your answer to UE-AARP 06, how many live in household with air conditioning but which chose not to run it during periods of high heat? Please provide the source for this information.

Response: AARP is not in possession of information as requested in UE-AARP 11. However, as indicated in Howat Surrebuttal Testimony, the survey referenced in Reply Testimony of Mr. Mark was not targeted specifically to low-income seniors in the Company's service territory. AARP has thus recommended that that as part of a pilot program, bill credit recipients and a sampling of low-income, elderly non-participants be surveyed at the pilot's outset and conclusion to develop a better understanding of air conditioning usage patterns, the extent to which operating costs contribute to decisions in these households to use available air conditioning, and the extent to which the availability of credits influences air conditioning usage during summer heat waves. AARP has further recommended that such a survey should be designed and implemented collaboratively, with participation of the Company, AARP and other interested stakeholders.

UE-AARP 12 – How many deaths were experienced in the service territory of AmerenUE due to heat in the summer of 2008? 2007? 2006? 2005? 2004? Please provide the source of information for your answer.

AARP is not in possession of data as requested by AmerenUE. However, according to the MO Department of Health and Senior Services website, there were 194 heat-related deaths reported statewide from 2000 – 2007. It should be noted however, that deaths reported by coroners rather than by medical examiners, confidentiality considerations, and a lag of up to 18 months in the reporting of deaths contribute to an under-reporting of actual heat-related deaths.

UE-AARP 13 – Of the numbers provided in response to UE-AARP 12, by year, how many of those deaths occurred in a household which had air conditioning available but chose not to run it? Please provide the source of information for your answer.

Response: Please see response to UE-AARP 12.

UE-AARP 14 – Of the programs identified in your answer to UE-AARP 04, is Mr. Howat aware of any review or analysis done to evaluate the effectiveness of the program? Please provide a copy of any review or analysis document.

Response: See response to UE-AARP 02.

UE-AARP 15 – Of the programs identified in your answer to UE-AARP 04, what evidence is available showing the program has decreased the number of heat related deaths experienced? Please provide the source of information for your answer.

Response: See response to UE-AARP 02.

UE-AARP 16 – Provide a copy of all documents, studies or other evidence which forms the basis for Mr. Howat's statement that "...Seniors aged 65 and above...may be reluctant to use air conditioning equipment in their homes even when available..." (Howat direct, p. 3.)

Response: See, e.g., Att. AARP-JH-3, AARP-JH-4 and "NEADA National Energy Assistance Report," p. 35, September 2005.

UE-AARP 17 – Provide a copy of all documents, studies or other evidence which forms the basis for Mr. Howat's statement that "The bill credit would serve as a means of encouraging customers...to use air conditioners in their homes during particularly hot weather..." (Howat direct, p. 4.)

Response: See Att. AARP-JH-1 demonstrating that the proposed bill credit of \$47/year represents more than ½ of the total annual operating cost of an Energy Star qualified, 10,000 BTU room air conditioning unit in the AmerenUE Service territory. Thus, the credit represents a meaningful incentive to operate such a unit during the hottest days of the summer.

UE-AARP 18 – Please define "particularly hot weather" as used on page 4 of Mr. Howat's direct testimony.

Response: In this context, "particularly hot weather" refers to days when the temperature exceeds 95° degrees F.

UE-AARP 19 - At what temperature does Mr. Howat believe elderly are at risk to their health to not run their air conditioners? Please explain the basis for this belief.

Response: Consistent with the MO Hot Weather Rule statute that prohibits disconnection of electricity service, Mr. Howat believes that elders are at risk to their health to not run their air conditioners when the temperature exceeds 95° degrees F.

UE-AARP 20 – At what temperature does Mr. Howat believe children the age of 2 or younger are at risk to their health to not be in a location that is cooled by an air conditioner? Please explain the basis for this belief.

Response: Consistent with the MO Hot Weather Rule statute that prohibits disconnection of electricity service, Mr. Howat believes that elders are at risk to their health to not run their air conditioners when the temperature exceeds 95° degrees F.

UE-AARP 21 – What was the end result of the discussions between AmerenUE and a range of stakeholders as referenced on page 3 of Mr. Howat's direct testimony?

I did not personally participate in these discussions, but the following is what I understand occurred based on documents from those meetings and from discussions with AARP representatives. Over a period of months in 2007 and 2008, a broad coalition of stakeholders met at the request of AARP to discuss a program that would provide an economic incentive to low-income seniors in order to encourage them to turn on their air conditioners during heat waves when the safety of these individuals are at extreme risk. Many program details were explored and various administrative issues ironed out.

Compromise ultimately led the group to develop a scaled-down pilot program that would provide an incentive to 2,400 participant AmerenUE customers, with the goal of jointly filing a proposed tariff with the Missouri PSC on May 1, 2008 and initiating the program during the 2008 hot weather period. On March 11 2008, AmerenUE circulated a draft document outlining the key elements for a pilot program that reflected the general consensus of the stakeholder group. Just prior to the April 28, 2008 meeting of the stakeholder group, AmerenUE abruptly pulled its support for the pilot program.

UE-AARP 22 – How long did AARP participate in the discussions between AmerenUE and the range of stakeholders as referenced on page 3 of Mr. Howat's direct testimony. Please explain when and why AARP quit participating in the discussions between AmerenUE and a range of stakeholders during the summer of 2008.

I did not personally participate in those stakeholder discussions, but based on documents from those meetings and from discussions with AARP representatives, it is my understanding that AARP participated fully in the meetings containing the full group of stakeholders as well as almost all of the meetings for each of the stakeholder subgroups. In all but one of the meetings for which AARP received notice, either John Coffman, Norma Collins, or Janee Briesemeister attended or participated via teleconference."

UE-AARP 23 – For each letter attached to the surrebuttal testimony of Mr. Howat, please provide the following information:

1. The name of the person(s) who contact the agency/organization to request a letter of support.

Norma Collins
Jay Hardenbrook

2. Copies of all emails, letters or other documents exchanged which discussed the AARP proposal and the request for letters of support for this proposal.

See the attached emails from AARP requesting letters of endorsement and copies of emails that sent back letters of endorsement to AARP for submittal to the Missouri Public Service Commission. The endorsement letters that were received by AARP are attached to AARP's surrebuttal testimony as Attachment AARP-JH-13.

3. Was there any agency/organization which was contacted but declined to provide a letter in support of AARP's proposal in this case? If so, please name the agency/organization and the individual who was AARP's point of contact.

The following organizations were contacted by email about possible endorsement letters, but did not respond back to AARP:

MARC – Jacqui Moore
Catholic Charities – Mike Halterman
Catholic Charities – Salvation Army – Megan Word
Missouri Quality Home Care – Stephanie Goodwin
Partnership for Children – Emily Smith

UE-AARP 24 – Has AARP or Mr. Howat undertaken a survey of elderly, low-income AmerenUE customers to determine what number does not run air conditioning during particularly hot weather?

Response: Please see response to UE-AARP 11.

UE-AARP 25 – Please provide the basis for the belief that a bill credit is sufficient to cause the customers who are the intended beneficiary of the AARP program to turn on their air conditioners during particularly hot weather?

Response: Please see response to UE-AARP 17.

From: Collins, Norma J.

Sent: Friday, October 31, 2008 11:19 AM

To: dkk@swmoa.com; Jacqui Moore (jacquimo@marc.org); Jean Leonatti (E-mail); Mary Schaefer; Hall, R. Diane

Cc: 'John Coffman'; Hardenbrook, Jay C.

Subject: FW: Hot Weather Safety Program letters

To those listed:

AARP is seeking your help in preparing letters of support for the proposed Hot Weather Safety Program. John Coffman, AARP utilities consultant, has provided some sample language for a brief letter of support that should be addressed to the Public Service Commission. I don't have e-mail addresses for all of Missouri's AAA directors, but would be glad if you can forward to your counterparts who are not included on this e-mail. I have copied John Coffman so that your letters can be forwarded to him electronically because of the rather short turn-around time.

Thanks for your attention to our request. I am in the office today and would be happy to answer any questions you might have.

Norma

Norma J. Collins

Assoc. State Director - Advocacy

AARP Missouri State Office

700 W. 47th Street | Suite 110

Kansas City, MO 64112 | 816.360.2201 - direct | 816.214.0874 - cell | 816.561.3107 - fax

ncollins@aarp.org

Norma:

Here is some sample language for letters of endorsement that we are looking for to support AARP's proposed Hot Weather Safety Program.

Obviously, they don't need to use this exact language, and if they can add any personal experience, all the better. But it doesn't need to be long either. We are hoping for group of letters--

"We support AARP's proposal to provide an economic incentive for low-income seniors to turn on their air conditioning during the hottest days of the summer. Many at-risk seniors do not run their air conditioning out of fear of rising energy costs, even during a heat wave. Every year there are seniors in this situation who die or face serious medical emergencies complicated by extreme heat. In fact, studies suggest that the impact of extreme heat on medical health is under-reported with regard to older individuals.

AARP's proposed Hot Weather Safety Program is designed to reach these vulnerable individuals and encourage them to be safe by providing a credit on their electric bill that would cover the cost of running an air conditioner during "heat alerts". At a minimum, we urge the Missouri Public Service Commission to approve AARP's Hot Weather Safety Program as a pilot program in AmerenUE's electric rate case. It could mean the difference between life and death."

(Company
#74)

The letters can be addressed to the Public Service Commission, P.O. Box 360, Jefferson City MO 65102, but we can bundle the letters and send them in ourselves. If we get them by November 4, we can attach them to our witness' surrebuttal testimony to be filed on November 5. Otherwise, we may need to just put them in the case file.

Thanks,
-John

John B Coffman, LLC
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