

Exhibit No.:  
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Witness: Contessa Poole-King  
Sponsoring Party: MO PSC Staff  
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**MISSOURI PUBLIC SERVICE COMMISSION**

**STAFF COUNSEL DEPARTMENT**

**SURREBUTTAL TESTIMONY**

**OF**

**CONTESSA POOLE-KING**

**KANSAS CITY POWER & LIGHT COMPANY**

**CASE NO. ER-2012-0174**

*Jefferson City, Missouri  
October 5, 2012*

*Staff Exhibit No. 253  
Dated 1/17/12 Reporter MW  
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1 participants. While Staff believes additional assessment of the program is needed before  
2 proceeding to permanent status with full recovery of all program cost from ratepayers, Staff  
3 does support continuing the ERPP, as a pilot program, maintaining currently authorized  
4 participation levels, current program terms and that funding remain 50% ratepayer and 50%  
5 shareholder.

6 **RESPONSE TO REBUTTAL TESTIMONY OF SCOTT H. HEIDTBRINK, KCPL**

7 Q. Company witness Scott H. Heidtbrink states on page 5, lines 11 through 13 of  
8 his rebuttal testimony state that, "I believe the evaluation report confirms the success of the  
9 pilot phase and the Program is ready to be expanded and fully implemented." Do you agree  
10 with Mr. Heidtbrink's assessment that the evaluation confirms the ERPP is successful and  
11 ready for expansion and full implementation?

12 A. I cannot conclude the evaluation report confirms the ERPP is a successful  
13 program deserving expansion and full implementation, given that the results included in the  
14 evaluation lack objectivity. The evaluation report does confirm that nine out of 10 current  
15 participants surveyed are satisfied with ERPP. However, the satisfied respondents are active  
16 ERPP participants and currently receiving a monthly fixed credit from KCPL. An 11-point  
17 questionnaire was mailed to 200 of these randomly selected current enrollees; overall 144  
18 responded. The evaluation excludes feedback from customers that were removed from the  
19 program sometime between September 2009 when the pilot program started and March 2012,  
20 when the questionnaires were mailed. Excluded from providing feedback were customers that  
21 were terminated from the program by KCPL and customers that completed the program in 12  
22 months and no longer participating.

1           According to the direct testimony of former KCPL employee Jimmy D. Alberts the  
2 purpose of the customer survey was to allow participants an opportunity to address program  
3 weaknesses, strengths, and provide suggestions for improvement. Mr. Heidtbrink, who  
4 adopted Mr. Alberts' direct testimony, provides a similar explanation of the purpose of the  
5 evaluation on page 4, lines 10 through 13 of his rebuttal testimony. Staff believes the  
6 Company fails to garner the objective customer feedback they wished to obtain by limiting  
7 the sampling to only 10% of active participants and excluding prior participants all together.

8           Q.     In addition to the customer survey results, the evaluation report includes  
9 responses from four Salvation Army employees interviewed because of their experience in  
10 enrolling customers in the ERPP. Did the employees offer suggestions on how to improve the  
11 ERPP?

12           A.     Yes. Overall, the Salvation Army employees believe that the ERPP is  
13 administered well and beneficial to qualifying customers; however, they did identify  
14 opportunities for improvement. As previously stated in my rebuttal testimony, I encourage  
15 the Company to consider the Salvation Army's recommendations concerning the application  
16 process and qualification requirements. It is my belief the recommendations will not change  
17 the terms and conditions of the program, but instead simplify the language in the customer  
18 application form, increase opportunity for applicants to quality and enhance communications  
19 between the applicant, KCPL, and the Salvation Army.

20           Q.     If Staff views the evaluation report as an insufficient measure of determining  
21 the ERPP is a successful program, why is Staff recommending the program continue at all?

22           A.     As I stated in my rebuttal testimony, Staff recognizes the monthly

1 "fixed-credit" helps relieve some financial hardship for customers that may not otherwise  
2 qualify for other assistance programs due to the income eligibility requirements of other  
3 assistance programs. Staff understands the importance of ensuring there are programs for  
4 customers on fixed incomes. However, as stated in my rebuttal testimony, after a thorough  
5 analysis of the data provided by the Company, Staff was unable to identify a need to expand  
6 the program from 1,000 to 2,500 participants with 100% rate recovery from ratepayers of all  
7 program cost. Again, the data did indicate current enrollee numbers are appropriate at this  
8 time. Staff believes continuation and not expansion is most appropriate.

9 Q. What is your recommendation to the Commission?

10 A. I have three recommendations. First, the Economic Relief Pilot  
11 Program (ERPP) should remain a pilot program, maintaining current program terms including  
12 participation levels, and program funding should remain 50/50. Staff recommends an  
13 additional pilot period to ensure this is a viable program before making it a permanent 100%  
14 ratepayer funded program.

15 Second, the ERPP reports should not be submitted to the DSM Advisory Group  
16 because, as stated in my rebuttal testimony, the ERPP is not a demand side management  
17 program (DSM) per the Commission approved Non-Unanimous Stipulation and Agreement in  
18 Case No. ER-2009-0089. Staff recommends the development of a separate advisory group  
19 who is familiar with low-income customers, issues and rate programs, for all future  
20 collaborative discussion regarding the ERPP.

21 Third, Staff is recommending KCPL provide the Economic Relief Pilot Program  
22 report to the advisory group on a monthly basis.

23 Q. Does this conclude your surrebuttal testimony?

A. Yes, it does.

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