

Exhibit No. 32

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Issue(s): Keeping Current
Energy Bill
Affordability
Protections for Low –
Income and Medically
Vulnerable Customers
Witness: Page Selby
Type of Exhibit: Rebuttal Testimony
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File No.: ER-2021-0240
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MISSOURI PUBLIC SERVICE COMMISSION

FILE NO. ER-2021-0240

REBUTTAL TESTIMONY

OF

PAGE SELBY

ON

BEHALF OF

UNION ELECTRIC COMPANY

D/B/A AMEREN MISSOURI

**St. Louis, Missouri
October, 2021**

REBUTTAL TESTIMONY

OF

PAGE SELBY

FILE NO. ER-2021-0240

1

I. INTRODUCTION

2

Q. Please state your name and business address.

3

A. My name is Page Selby. My business address is One Ameren Plaza, 1901
4 Chouteau Ave., St. Louis, Missouri, 63104.

5

Q. By whom are you employed and what is your position?

6

A. My employer is Ameren Missouri, and I am the Manager of Customer
7 Advocacy in the Credit, Customer Advocacy, and Revenue Protection Department.

8

**Q. Please describe your educational background and employment
9 experience.**

10

A. I have a BA degree in Economics and Business Administration from Illinois
11 College. I also earned a Chancellor's Certificate in Economic Development from
12 University of Missouri-St. Louis. I have 33 years of experience in customer service,
13 marketing, and change management. Prior to joining Ameren I was the Vice President of
14 Marketing and Training for Mercantile Bank of Illinois, and owner of two small businesses.
15 I joined Ameren Missouri's Business and Community Development team seven years ago.

16

Q. What are your responsibilities in your current position?

17

A. I have been in my current position since July of this year, and I am
18 responsible for the ongoing development, planning, management, and communication of

1 Ameren Missouri's customer advocacy strategy, including programs, outreach, budget
2 oversight and relationships with community agencies.

3 **Q. To what testimony or issues are you responding?**

4 A. I am responding to the issues raised by Consumers Council of Missouri
5 ("CCM") witness Jacqueline Hutchinson as they relate to increased funding for Keeping
6 Current/Keeping Cool and the Medical Equipment Registry ("MER") program. I am also
7 responding to the recommendations and concerns raised by the Office of Public Counsel
8 ("OPC") witness Dr. Geoff Marke, with regard to the most recent Applied Public Policy
9 Research Institute for Study and Evaluation ("APPRISE") report.

10 **Q. What is your response to Dr. Marke's recommendation that the**
11 **Commission increase funding for Keeping Current/Keeping Cool to at least \$5 million?**

12 A. Keeping Current has proven to be a successful program for many customers.
13 Our data shows that 77% of Ameren Missouri customers on Keeping Current avoided
14 disconnect notices. On October 5th, Ameren Missouri announced an additional \$1.5 million for
15 Clean Slate 2021, a program designed to bridge customers to Keeping Current. This includes
16 \$1.3 million approved by the Commission in the Unanimous Stipulation and Agreement
17 Regarding Keeping Current Funds and Motion for Expedited Treatment, File No. ER-2019-
18 0335 ("Stipulation"). However, these successes do not mean the Commission should increase
19 funding at this time. There are challenges with program awareness, a lack of staffing for the
20 agencies to administer the program, and a decrease in applications. For those reasons, it would
21 not be prudent to increase the funding at this time. We are working to resolve these limitations.
22 The agencies that run the program had reported the need for help educating the communities
23 about this program that was addressed in the Stipulation and, as a result, Ameren Missouri

1 provided \$150,000 to fund a Keeping Current program manager for two years. This program
2 manager will focus on outreach and publicity around Keeping Current, including outreach to
3 specific groups such as landlords, homeless to housing case managers, and local public health
4 agencies. An additional \$150,000 will be distributed to Keeping Current agencies for overhead
5 and expenses related to administering the Keeping Current program. Consideration for future
6 funding increases can be based on the results of these investments. Ameren Missouri would
7 support an increase in eligibility to 300% of the federal poverty level, with the approval of the
8 Keeping Current Collaborative and the Commission. Additionally, Ameren Missouri
9 recommends increasing income eligibility for Keeping Cool to 300% of the federal poverty
10 level to create a differentiator and allow for low to moderate income retirees, like retired
11 teachers, to qualify for Keeping Cool. Ameren Missouri intends to discuss this with the Keeping
12 Current Collaborative and bring it to the Commission for approval as is appropriate.

13 **Q. With regard to the APPRISE study recommendations, will Ameren**
14 **Missouri's call center advisors who receive calls from customers struggling to pay bills ask**
15 **for consent to forward their contact information to a community action agency so they**
16 **may be contacted about weatherization and other assistance if eligible?**

17 A. Yes, Ameren Missouri will continue to refer customers to agencies for
18 assistance, and will conduct additional outreach through the new Keeping Current Program
19 Manager. Ameren Missouri regularly coordinates communication with internal departments to
20 keep our call center advisors up to date on the program. I believe we should continue to support
21 more outreach and promotions for the weatherization program. We will continue to look for
22 ways for customers to opt-in sharing their information with non-profits for the purpose of
23 weatherization and energy assistance.

1 **Q. Going forward, does Ameren Missouri recommend retention of the income**
2 **eligibility guidelines of 150% of federal poverty level?**

3 A. The current income level of 200% of federal poverty level for Keeping Current
4 was approved through the end of 2021 due to the pandemic. Ameren Missouri recommends
5 making the increase to 200% permanent beyond December 31, 2021. Ameren Missouri also
6 recommends continuing to require applications for weatherization assistance, Low-Income
7 Home Energy Assistance Program ("LIHEAP"), and Budget Billing as part of this program.

8 **Q. Does Ameren Missouri support a Percentage of Income Program ("PIPP")**
9 **that provides a fixed monthly bill for qualifying customers?**

10 A. No. Ameren Illinois has a PIPP program that is similar to the Ameren Missouri's
11 Budget Bill Rollover program and is already a choice for Missouri customers. Ameren Illinois
12 agencies report capacity concerns with PIPP, as the case management follow-up is a struggle.
13 In addition, seniors like the idea of paying a set monthly amount, but PIPP may not be the best
14 financial option for them (LIHEAP would provide a larger benefit). This also creates a
15 Company risk because PIPP waives deposits, so if a customer is dropped from the program for
16 failing to make payments, Ameren Missouri has no security deposit. Ameren Missouri will
17 continue to explore programs such as PIPP as part of our efforts to help reduce the energy burden
18 for low-income customers. But, as of this time, the combination of Keeping Current,
19 weatherization and energy efficiency projects, along with the Company's implementation of a
20 new web presentment tool (called Bidgely) that provides energy usage appliance itemization is
21 our best path to help decrease energy costs, reduce energy burden and increase energy security
22 for customers.

1 **Q. Does Ameren Missouri support providing enhanced benefits for the**
2 **formerly homeless?**

3 A. We do have programs to benefit this group. Keeping Current is an excellent tool
4 to help with programs designed to transition homeless customers to permanent housing. Ameren
5 Missouri works with St. Patrick Center, a transitional housing agency and Keeping Current
6 agency. We recently reached out to remind St. Patrick's to use their existing Keeping Current
7 funds and conducted additional training for new staff members. The new Clean Slate 2021,
8 combined with Keeping Current and LIHEAP will be a very powerful combination to help
9 clients maintain their utility services and remain in their homes.

10 **Q. Does Ameren Missouri have any plans to allow bad debt forgiveness, as**
11 **suggested by the Consumers' Council?**

12 A. Ameren Missouri's Clean Slate 2021 program, launched October 11, 2021,
13 provides funds to forgive bad debt for eligible households and customers reconnecting closed
14 accounts. Bad debt forgiveness is already part of the Keeping Current program.

15 **Q. Dr. Marke also recommends Ameren Missouri's plan to develop a more**
16 **transparent and easily accessible Medical Equipment Registry, target medically at-risk**
17 **customers and those with medical devices, including an online portal accessible to medical**
18 **health professionals. What are your thoughts around this proposal?**

19 A. I would like to better understand this proposal. The Ameren Missouri portal was
20 established for referrals and I am unclear exactly what else Dr. Marke would like the portal to
21 do. Ameren Missouri is open to talking with health care professionals to identify an
22 efficient process to help register customers for our medical equipment registry, to sign up

1 for Caring Contacts/alerts, and to help connect customers in need of assistance with
2 programs including Keeping Current and LIHEAP.

3 Today, we work with area hospitals via phone and email to help customers that are being
4 sent home with medical equipment connect to agencies for assistance. As an example, Ameren
5 Missouri is part of the development of a new closed loop referral network called the
6 Community Information Exchange being piloted by the United Way, BJC, and several
7 social service agencies. This may be another way to help connect critical care customers to
8 these programs.

9 Ameren Missouri is always looking to improve the application process as well as the
10 process for identifying at-risk customers. Ameren Missouri recently added forms for both the
11 MER and Caring Contact Program ("CCP") to the online website, so customers can easily
12 access them without having to call and request them to be mailed. Ameren Missouri included
13 statement inserts in September directing customers to our Health and Safety webpage,
14 <https://www.ameren.com/missouri/residential/energy-assistance/health-safety-options> where
15 the online forms can be found. In addition, Ameren Missouri will launch a Pandemic Relief
16 Credit program which will target customers who are more vulnerable due to COVID-19, as well
17 as Medical Equipment Registry (and CCP participants). The income requirement of up to 250%
18 of the federal poverty level will allow a family of four with an annual income of up to \$66,250
19 to receive assistance, with no required payment of the past due balance. Ameren Missouri will
20 look at working with health care professionals to identify an efficient process to help register
21 eligible customers for our Medical Equipment Registry and Caring Contact Program and Alerts,
22 and will help connect customers in need of assistance with programs including Keeping Current
23 and LIHEAP.

1 **Q. Does Ameren Missouri consider modifying the Keeping Current tariff to**
2 **allow customers to receive a benefit despite two non-payments and up to four payments**
3 **of a minimum of \$25 for up to four consecutive billing cycles?**

4 A. I am not sure I fully understand the recommendation. Is it to continue to allow
5 a customer to receive a minimum credit of \$25 with missed payments? I recommend
6 maintaining the program as-is for now, and continuing to assess if a change is needed. If a
7 customer is removed from the program for missed payments, the assistance agency receives
8 notification and will usually contact the customer to explore re-enrollment. Applying for
9 weatherization assistance is a condition of Keeping Current participation, as weatherization
10 repairs are the most effective method to lower energy costs.

11 **Q. Does Ameren Missouri support the APPRISE recommendation to modify**
12 **the Keeping Current tariff to allow customers to remain in the program as long as they**
13 **are not terminated due to nonpayment?**

14 A. I recommend maintaining the program as-is for now, and continuing to assess
15 if a change is needed. If a customer is experiencing problems with payments, agency
16 intervention before balances become larger would be a help to the customer.

17 **Q. Would Ameren Missouri consider conducting a three-year pilot program,**
18 **utilizing Baltimore Gas & Electric's ("BG&E") Critical Needs Program framework, as**
19 **suggested by Dr. Marke?**

20 A. Dr. Marke states that BG&E's program goal is to "...implement immediate
21 access to existing resource assistance (bill payment, repair, consumer protections, etc.) to
22 customers that seek assistance in nontraditional utility Customer Service Representative

1 ("CSR") venues (e.g., hospitals, public and private assistance agencies, shelters, etc.)."¹ As I
2 understand it, the BG&E pilot did not dedicate additional money, it utilized existing LIHEAP
3 money, and partnered with hospitals for program referrals. Ameren Missouri already utilizes
4 this method of outreach and response with our Medical Hardship Extension ("MHE") program
5 - if a customer, hospital or medical office calls on behalf of a customer, we automatically offer
6 a payment extension and stop disconnection. We look to LIHEAP and Dollar More program
7 funds to assist customers with maintaining or restoring service. We also provide referrals for
8 weatherization assistance and other programs, and to agencies for case management and social
9 services. Ameren Missouri also offers the Medical Equipment Registry ("MER") program for
10 customers to register necessary medical equipment, and we proactively review MER accounts
11 in threat of disconnection, reaching out to those customers with numerous options including
12 connecting them with energy assistance agencies and reducing power rather than disconnecting.
13 Ameren Missouri will continue robust, proactive outreach with additional community partners
14 and organizations, as part of our planned outreach efforts. As Dr. Marke stated, "Ameren
15 Missouri's outreach and community engagement is already one of the best in the state."²

16 However, I believe the development of a formalized and coordinated critical needs
17 process is a good idea for our customers and for Ameren Missouri. In order to be responsible
18 with ratepayer and shareholder dollars, I would not recommend allocating \$500K to the
19 program at this point. I don't believe we know the best way to facilitate this process until we
20 engage health care professionals, existing community information exchange networks, energy
21 assistance agencies and utilities to determine the most effective and efficient path forward. I
22 believe an immediate pilot can be designed and implemented (Phase One) using existing tools,

¹ File No. ER-2021-0240, Direct Testimony of Geoff Marke, p. 26, lines 18-20.

² File No. ER-2021-0240, Direct Testimony of Geoff Marke, p. 27, lines 20-21.

1 training and the development of a joint form with Spire. Phase One should include outreach to
2 targeted health organizations. Phase Two approach would identify if a technology based
3 solution is feasible, and determine if leveraging existing systems or investing in new technology
4 is better. This could involve an RFP process and funding would be needed for this phase.
5 Customer privacy would need to be maintained throughout. This process could also incorporate
6 a collaborative to ensure oversight, inclusion and progress.

7 **Q. Does Ameren Missouri plan to continue arrearage forgiveness, as**
8 **suggested by Dr. Marke?**

9 A. Ameren Missouri has provided energy assistance grants, including arrearage
10 forgiveness through the Clean Slate and Keeping Current programs, and will continue to do so
11 as long as funds are available. Educating customers on this important benefit is part of the
12 outreach for these programs, and agencies partner with us for that education. We have offered
13 arrearage forgiveness before the pandemic, throughout the pandemic, and will continue offering
14 beyond the pandemic as long as programs are funded.

15 **Q. What additional outreach and reminders does Ameren Missouri provide**
16 **as related to applications for LIHEAP?**

17 A. Ameren Missouri provides outreach around LIHEAP in several ways – through
18 statement inserts, news releases, on our website, through Customer Care advisors, and in
19 conjunction with other programs.

1 **Q. Dr. Marke suggests that Keeping Current be revised to allow customers to**
2 **remain on the program, even after nonpayment. He also suggests they receive monthly**
3 **bill credits for all made up past due monthly bills. How do you respond to those**
4 **suggestions?**

5 **A. The purpose of Keeping Current is to help customers establish an affordable**
6 **payment and create the successful habit of making on time payments. The monthly bill credit**
7 **rewards on time payments and helps reduce the total amount owed. We did allow customers to**
8 **remain on the program with missed payments during the COVID-19 lockdown period when**
9 **there was so much uncertainty due to the pandemic. With increased state and federal funding,**
10 **and the program change in 2017 that allows one missed payment before the two counted missed**
11 **payments (i.e., three missed payments), customers have greater opportunities for success on the**
12 **program. If customers cannot make payments, they should talk to us or an agency about other**
13 **options for programs where they can be successful. Our goal is to set these customers up for**
14 **success.**

15 **Q. What are your thoughts about adopting a pilot program similar to BG&E**
16 **Critical Needs Program, as recommended by Dr. Marke?**

17 **A. I do not believe formal adoption of this program is necessary to achieve the**
18 **program's goals.**

19 **Q. Does this conclude your rebuttal testimony?**

20 **A. Yes, it does.**

