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306  
Exhibit No.:  
Issues: Red Tag Repair Program  
Witness: Jordan R. Elliott  
Sponsoring Party: Missouri Department of  
Economic Development –  
Division of Energy  
Type of Exhibit: Surrebuttal Testimony  
Case No.: GR-2019-0077

**MISSOURI PUBLIC SERVICE COMMISSION**

**UNION ELECTRIC COMPANY d/b/a AMEREN MISSOURI**

**CASE NO. GR-2019-0077**

**SURREBUTTAL TESTIMONY**

**OF**

**JORDAN R. ELLIOTT**

**ON**

**BEHALF OF**

**MISSOURI DEPARTMENT OF ECONOMIC DEVELOPMENT**

**DIVISION OF ENERGY**

Jefferson City, Missouri

July 10, 2019

MDEO Exhibit No. 306  
Date 8-15-19 Reporter COT  
File No. GR-2019-0077



BEFORE THE PUBLIC SERVICE COMMISSION  
OF THE STATE OF MISSOURI

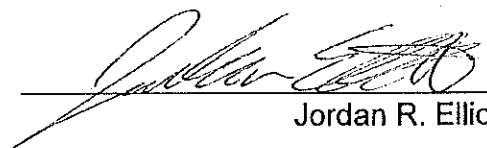
In the Matter of Union Electric Company )  
d/b/a Ameren Missouri's Tariffs to Increase ) File No. GR-2019-0077  
Its Revenues for Natural Gas Service )

AFFIDAVIT OF JORDAN R. ELLIOTT

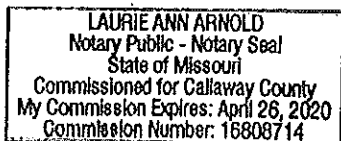
STATE OF MISSOURI )  
 ) ss  
COUNTY OF COLE )


Jordan R. Elliott, of lawful age, being duly sworn on his oath, deposes and states:

1. My name is Jordan R. Elliott. I work in the City of Jefferson, Missouri, and I am employed by the Missouri Department of Economic Development as an Energy Policy Analyst, Planner II, Division of Energy.
2. Attached hereto and made a part hereof for all purposes is my Surrebuttal Testimony on behalf of the Missouri Department of Economic Development – Division of Energy.
3. I hereby swear and affirm that my answers contained in the attached testimony to the questions therein propounded are true and correct to the best of my knowledge.

  
Jordan R. Elliott

Subscribed and sworn to before me this 10<sup>th</sup> day of July, 2019.



  
Notary Public

My commission expires: 4/26/20

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1 | **I. INTRODUCTION**

2 | **Q. Please state your name and business address.**

3 | A. My name is Jordan R. Elliott. My business address is 301 West High Street, Suite  
4 | 720, PO Box 1766, Jefferson City, Missouri 65102.

5 | **Q. By whom and in what capacity are you employed?**

6 | A. I am employed by the Missouri Department of Economic Development – Division  
7 | of Energy (“DE”) as an Energy Policy Analyst, Planner II.

8 | **Q. Have you previously filed testimony before the Missouri Public Service  
9 | Commission (“Commission”) in this proceeding?**

10 | A. Yes. I filed Rebuttal Testimony on the Red Tag Repair Program proposed by Union  
11 | Electric Company d/b/a Ameren Missouri (“Ameren Missouri” or “Company”) in this  
12 | case.

13 | **II. PURPOSE OF TESTIMONY**

14 | **Q. What is the purpose of your Surrebuttal Testimony in this proceeding?**

15 | A. The purpose of my Surrebuttal Testimony is to respond to the Rebuttal  
16 | Testimonies of Company witness Ms. Laureen M. Welikson and Commission Staff  
17 | (“Staff”) witness Ms. Kory J. Boustead. DE supports the Company's proposal to  
18 | use \$25,000 of the Income Eligible Weatherization Assistance Program (“IEWAP”)  
19 | budget for the proposed Red Tag Repair Program. However, DE is also open to  
20 | consideration of alternative funding sources for the program.

1    **III.    RESPONSE TO AMEREN MISSOURI**

2    **Q.    Ms. Welikson reiterates her recommendation to use \$25,000 of the IEWAP**  
3       **budget to support a Red Tag Repair Program.<sup>1</sup> What is DE's response?**

4    A.    As stated in the prior Rebuttal Testimony of DE Witness Mr. Martin R. Hyman,  
5       DE would accept the reallocation of \$25,000 in IEWAP funds to a Red Tag  
6       Repair Program,<sup>2</sup> particularly a program that incorporates the recommendations  
7       outlined in my Rebuttal Testimony in this case. DE's recommendations would  
8       enable the Red Tag Repair Program to support and provide supplement to  
9       weatherization assistance efforts through the consideration of energy efficiency  
10      when replacing customer space heating equipment.<sup>3</sup>

11   **IV.    RESPONSE TO COMMISSION STAFF**

12   **Q.    What is your response to Ms. Boustead's statement that, "Averaged over**  
13       **the past five years, the Company has spent 90 percent of its [IE]WAP**  
14       **annual program budgets?"<sup>4</sup>**

15   A.    The Direct Testimony of DE witness Ms. Sharlet E. Kroll in this case states that,  
16       "... the expenditure levels under the IEWAP over the past few years have  
17       exceeded 85 percent of available funds."<sup>5</sup> This statement by Ms. Kroll does not  
18       indicate an average spend of over 90 percent. IEWAP spending only exceeded  
19       90 percent of the available budget in one program year out of the previous five.<sup>6</sup>

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<sup>1</sup> GR-2019-0077 Welikson Rebuttal, page 2, lines 7-8.

<sup>2</sup> GR-2019-0077 Hyman Rebuttal, page 3, lines 10-14.

<sup>3</sup> GR-2019-0077 Elliott Rebuttal, page 6, lines 6-11.

<sup>4</sup> GR-2019-0077 Boustead Rebuttal, page 6, lines 1-2.

<sup>5</sup> GR-2019-0077 Kroll Direct, page 10, lines 3-4.

<sup>6</sup> *Id.*, lines 1-2.

1 In fact, the average spend of the previous five full program years, beginning in  
2 2013-2014 and ending in 2017-2018, is 82.71 percent of the program budget.  
3 This difference between the amount budgeted and amount spent would generally  
4 support an allocation of \$25,000 for a Red Tag Repair Program. The "Amount  
5 Unspent" column in Table 1 below substantiates this.

6 **Table 1. Company IEWAP statistics for 2013-2018.**

YEAR	BUDGET	EXPENDITURE	PERCENT	AMOUNT UNSPENT
2013-2014	\$446,206	\$276,136	61.89%	\$170,070
2014-2015	\$433,119	\$387,185	89.39%	\$45,934
2015-2016	\$308,696	\$298,917	96.83%	\$9,779
2016-2017	\$272,772	\$238,105	87.29%	\$34,667
2017-2018	\$297,805	\$254,175	85.35%	\$43,630
<b>TOTAL</b>	<b>\$1,758,598</b>	<b>\$1,454,518</b>	<b>82.71%</b>	<b>\$304,080</b>

7 Furthermore, if administration of the IEWAP were to transition back to the  
8 Company, DE would support allowing the roll-over of unspent IEWAP funds, as  
9 noted in Ms. Kroll's Direct Testimony.<sup>7</sup> This practice would allow overages from  
10 long years to cover the program's occasional short year.

11 **Q. Staff opposes using \$25,000 of the IEWAP budget to support a Red Tag**  
12 **Repair Program.<sup>8</sup> Is DE open to the consideration of other funding**  
13 **sources?**

14 **A. Yes.**

<sup>7</sup> *Id.*, page 20, line 7

<sup>8</sup> GR-2019-0077 Boustead Rebuttal, page 5, lines 19-20 & page 6, line 1

1 | **V. CONCLUSIONS**

2 | **Q. Please summarize your conclusions.**

3 | A. While DE supports the Company's proposal to use \$25,000 of the IEWAP budget  
4 | for the proposed Red Tag Repair Program, DE is also open to consideration of  
5 | alternative funding sources for the program.

6 | **Q. Does this conclude your Surrebuttal Testimony?**

7 | A. Yes.