

## Exhibit No. 249

Commission Staff – Exhibit 249  
Kory J. Boustead  
Rebuttal Testimony (Gas)  
File Nos. ER-2021-0240 & GR-2021-0241

*Exhibit No.:*  
*Issue(s):* Low Income Programs  
*Witness:* Kory J. Boustead  
*Sponsoring Party:* MoPSC Staff  
*Type of Exhibit:* Rebuttal Testimony  
*Case No.:* GR-2021-0241  
*Date Testimony Prepared:* October 15, 2021

**MISSOURI PUBLIC SERVICE COMMISSION**  
**INDUSTRY ANALYSIS DIVISION**  
**ENERGY RESOURCES DEPARTMENT**

**REBUTTAL TESTIMONY**

**OF**

**KORY J. BOUSTEAD**

**UNION ELECTRIC COMPANY**  
**d/b/a Ameren Missouri**

**CASE NO. GR-2021-0241**

*Jefferson City, Missouri*  
*October 2021*

1 **REBUTTAL TESTIMONY**

2 **OF**

3 **KORY J. BOUSTEAD**

4 **UNION ELECTRIC COMPANY**

5 **d/b/a Ameren Missouri**

6 **CASE NO. GR-2021-0241**

7 Q. Please state your name and business address.

8 A. Kory J. Boustead and my business address is Missouri Public Service Commission,  
9 P.O. Box 360, Jefferson City, Missouri, 65102.

10 Q. By whom are you employed and in what capacity?

11 A. I am employed by the Missouri Public Service Commission ("Commission") as a  
12 Research/Data Analyst, Energy Resources Department, Industry Analysis Division.

13 Q. Are you the same Kory J. Boustead that previously filed testimony in Staff's Cost  
14 of Service Report in this case?

15 A. Yes, I am.

16 Q. What is the purpose of your rebuttal testimony?

17 A. The purpose of my rebuttal testimony is to provide Staff's position regarding the  
18 recommendation in the direct testimony of Office of the Public Counsel ("OPC") witness,  
19 Dr. Geoff Marke, in regards to the proposed Critical Needs Program.

20 Q. Please give an overview of the program recommended by the Office of the Public  
21 Counsel.

1           A. In his direct testimony<sup>1</sup>, Dr. Marke gives an overview of a pilot program agreed<sup>2</sup> to  
2 in Case No. GR-2021-0108<sup>3</sup>, modeled after Baltimore Gas & Electric's ("BG&E"), Critical  
3 Needs Program ("CNP"). Dr. Marke states,

4                           The BG&E program recognized that there are vulnerable  
5 customers who may not have the capacity to research and apply  
6 for assistance, negotiate reasonable payment plans, or properly  
7 navigate the application process. Yet their circumstances make  
8 them particularly vulnerable to harm if they become  
9 disconnected. In response, the CNP streamlines and expedites the  
10 processes to help customers stay connected. The pilot's initial  
11 goal was to implement immediate access to existing resource  
12 assistance (bill payment, repair, consumer protections, etc...) to  
13 customers that seek assistance in nontraditional utility CSR<sup>4</sup>  
14 venues (e.g., hospitals, public and private assistance agencies,  
15 shelters, etc...). The CNP is a voluntary program that trains  
16 customer 'navigators,' who work in nontraditional utility CSR  
17 venues. The navigators utilize a simple form under a 'fast-track'  
18 protocol that provides an expedited process that should:

- 19           • Maintain or restore utility services;
- 20           • Avoid negative impacts on residents with serious medical
- 21           conditions;
- 22           • Address build-up of utility bill arrears; and
- 23           • Provide a streamlined process to complementary services.<sup>5</sup>

24           Q. What is OPC's recommendation in regards to this program?

25           A. Dr. Marke recommends, "program financing of up to \$100K annually  
26 (split 50/50 between ratepayers/shareholders) for the three-year pilot program, with regular

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<sup>1</sup> Direct Testimony of Dr. Geoff Marke, page 1.

<sup>2</sup> Case No. GR-2021-0108 *In the Matter of Spire Missouri Inc.'s d/b/a Spire Request for Authority to Implement a General Rate Increase for Natural Gas Service Provided in the Company's Missouri Service Areas, Order Approving Partial Stipulations and Agreement*, September 15, 2021, page 5-6.

<sup>3</sup> Case No. GR-2021-0108 *In the Matter of Spire Missouri Inc.'s d/b/a Spire Request for Authority to Implement a General Rate Increase for Natural Gas Service Provided in the Company's Missouri Service Areas, Non-Unanimous Stipulation & Agreement, Limited Income, EE*, August 5, 2021, pages 3 & 4.

<sup>4</sup> Customer Service Representative.

<sup>5</sup> Case No. GR-2021-0241, Direct Testimony of Geoff Marke, page 1, line 19 to page 2, line 12.

Rebuttal Testimony of  
Kory J. Boustead

1 meetings from interested stakeholders in the Keeping Current collaborative<sup>6</sup> to see if equivalent  
2 success can be achieved for Ameren Missouri's customers as the BG&E pilot produced."<sup>7</sup>

3 Q. Does Staff oppose OPC's recommendation?

4 A. No. Staff finds OPC's recommendation reasonable.

5 Q. Does this conclude your rebuttal testimony?

6 A. Yes, it does.

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<sup>6</sup> Keeping Current is an Ameren Electric low-income program that has designated stakeholders that make up the Keeping Current Collaborative, a non voting advisory group..

<sup>7</sup> Case No. GR-2021-0241, Direct Testimony of Geoff Marke, page 3, lines 1-5

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 Natural Gas Service            )     Case No. GR-2021-0241

**AFFIDAVIT OF KORY J. BOUSTEAD**

STATE OF MISSOURI     )  
  )  
COUNTY OF COLE     )     ss.

COMES NOW KORY J. BOUSTEAD and on her oath declares that she is of sound mind and lawful age; that she contributed to the foregoing *Rebuttal Testimony of Kory J. Boustead*; and that the same is true and correct according to her best knowledge and belief.

Further the Affiant sayeth not.

Kory J. Boustead  
KORY J. BOUSTEAD

**JURAT**

Subscribed and sworn before me, a duly constituted and authorized Notary Public, in and for the County of Cole, State of Missouri, at my office in Jefferson City, on this 13<sup>th</sup> day of October 2021.

DIANNA L. VAUGHT  
Notary Public - Notary Seal  
State of Missouri  
Commissioned for Cole County  
My Commission Expires: July 18, 2023  
Commission Number: 15207377

Dianna L. Vaught  
Notary Public