Exhibit No.:	
Issues:	Ameren Missouri's Proposed MEEIA Cycle II Residential Low-Income program
Witness:	Annika Brink
Sponsoring Party:	National Housing Trust
Type of Exhibit:	Rebuttal Testimony
Case No.:	EO-2015-0055
Date Testimony Prepared:	March 20, 2015

MISSOURI PUBLIC SERVICE COMMISSION

CASE NO. EO-2015-0055

REBUTTAL TESTIMONY

OF

ANNIKA BRINK

ON

BEHALF OF

NATIONAL HOUSING TRUST

March 20, 2015

Q. Please state your name and business address.

A. Annika Brink, National Housing Trust, 1101 30th Street NW, Suite 100A, Washington, DC 20007.

Q. On whose behalf are you testifying?

A. I am testifying on behalf of the National Housing Trust (NHT). All work developing my testimony has been completed by me or under my direction.

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

A. I am employed by the National Housing Trust (NHT) as their Energy Efficiency Advisor. In this capacity I work with state and local partners across the country to make multifamily housing healthy and affordable through energy efficiency. I have primary responsibility for NHT's energy efficiency policy work in the Midwest, including Missouri.

Q. Please provide a summary of your qualifications and experience.

A. I earned a Bachelor of Arts in both History and German Studies from Wesleyan University in 2005 and subsequently spent a year studying Architecture and Urban Planning at the Universität Stuttgart in Stuttgart, Germany. In 2011, I earned a Master in Public Policy from Harvard University where I focused on energy, sustainability, and social/urban policy and during which time I produced research on state and local policy solutions for rental sector energy efficiency.

I have five years of professional experience with energy policy, affordable housing, and green building, both from an energy and a housing perspective. Beginning in 2011, I spent over two years leading the nonprofit Alliance to Save Energy's engagement of publicly-owned not-for-profit electric power utilities, helping utilities share best practices, consider energy efficiency program models, benchmark their energy efficiency portfolios, develop innovative online tools, and achieve consensus on priority topics. Since 2013 I have been a LEED Green Associate.

In my work for the National Housing Trust, I analyze state, local, and utility efficiency policies and programs, help disseminate best practices, and facilitate coordination among housing and energy stakeholders. I have filed comments with utility regulators in both Minnesota and Missouri. In 2014-2015

I worked with staff at the Natural Resources Defense Council to organize a series of five St. Louis metro area convenings to explore the experience, barriers, solutions, and potential recommendations related to expanding energy efficiency for affordable multifamily housing in Missouri and Illinois. I was a member of the energy usage stakeholder group that provided input to the Missouri Division of Energy's as they developed the forthcoming State Energy Plan.

In addition to my work at the National Housing Trust, I have worked for affordable housing developers in Grand Rapids, Michigan (internship) and Minneapolis, Minnesota, including work on green affordable housing, community development, and multifamily rehabilitation projects.

Q. Have you previously testified before this Commission?

A. No, this is my first time providing testimony. I presented to the Commissioners and stakeholders at the October 2014 State-Wide Collaborative meeting.

Q. Please summarize your testimony.

A. My testimony addresses how Ameren's proposed MEEIA Cycle II programs for 2016-2018 ("Cycle II") impact low-income and/or affordable multifamily housing. I address how Ameren's programs offerings should be changed to better serve these vulnerable and hard-to-reach market segments: these comments focus on serving multifamily with its own targeted program, program design, eligibility and program size, and coordination with key non-utility stakeholders. I also address how Ameren has applied cost-effectiveness tests to low-income programs and suggest that Ameren take account of the many non-energy benefits flowing from energy efficiency in low-income multifamily housing, such as reduced gas, water, and sewer expenses, improved resident health and comfort, and reduced bill arrearages, customer calls, collection activities, and safety-related emergency calls.

Q. You indicate that you support changes to Ameren's programs for low-income and/or affordable multifamily housing in order to better serve these market segments. Please outline the types of program changes you recommend.

A. <u>There are four areas in which I recommend changes: 1) serving multifamily with its own targeted program, 2) program design, 3) eligibility and program size, and 4) coordination with key non-utility</u>

stakeholders. These comments are most relevant to the proposed “Residential Low-Income” program, but also impact Commercial offerings for which affordable multifamily housing is eligible.

Over a series of five St. Louis metro area convenings in 2014, the National Housing Trust, the Natural Resources Defense Council, and a wide range of stakeholders explored the experience, barriers, solutions, and potential recommendations related to expanding energy efficiency for affordable multifamily housing in Missouri and Illinois. Representatives from both Ameren and Laclede participated in the majority of these conversations and were very helpful in providing information on existing utility programs as well as feedback on a variety of topics. The culmination of these conversations was a White Paper entitled “Scaling Up Energy Efficiency in Missouri and Illinois Multifamily Affordable Housing.”(Attached as Exhibit A), which outlines recommendations that were supported by a strong majority of the participants. I highly recommend the Commission review this short, extremely informative document.

Q. Why is it important that Ameren serve multifamily and single-family housing in separate programs?

A. Affordable multifamily housing is a sector with unique barriers and needs: neither multifamily nor single family homes are well served by a program that seeks to serve both. Ameren changed its program description from Cycle I to Cycle II to include single family in its residential low-income program that previously served only multifamily: Cycle I language states there is “a *possibility* of broadening the target market to include duplex and single family, low-income rental homes” (emphasis added) whereas Cycle II now states “the target market *is* residential communities consisting of single family and apartment buildings” (emphasis added). While we appreciate the impulse to serve low-income residents across building types and recognize the importance of serving low-income single-family households, a program that tries to cater generally across the multifamily and single family sectors cannot simultaneously tailor itself to the unique needs of the multifamily sector.

We urge Ameren to further tailor its existing low-income multifamily offering(s) for streamlined delivery to affordable multifamily buildings, rather than expand it to serve additional, very different building types. Multifamily is already considered a "hard-to-serve" sector: we encourage Ameren to build on its Cycle I success in this sector by further refining its ability to overcome this sector's unique barriers. Among the factors that can make multifamily buildings uniquely difficult to serve are: the existence of multiple "commercial" and "residential" meters across common area and tenant spaces, split incentives, complex financing and capital needs, complex management and decision-making structures, limited staff time to manage incentive processes, unfamiliarity of contractors with multifamily building stock, extended rehabilitation/retrofit timelines coordinated with periodic recapitalization cycles, and energy usage data that are difficult for building owners to access. Furthermore, while multifamily buildings can successfully be weatherized via the federal Weatherization Assistance Program, many local implementers have difficulty working with U.S. Department of Energy regulations for serving multifamily buildings and thus often decline to do so.

As discussed below, there are improvements to Ameren's proposed Cycle II program that would help overcome the many barriers to serving the affordably multifamily sector, e.g. a one-stop shop program design.

Q. What does the phrase "one-stop shop" refer to in the context of efficiency programs targeted to low-income and affordable multifamily properties?

A. A "one-stop shop" program takes a whole-building, full-service approach to in order to streamline participation and achieve deeper savings per building: it provides multifamily owners with a single point of contact for both electric and gas, as well as in-unit and common area/building system measures (regardless of whether the impact is to a residential or commercial meter). It is targeted to breaking down barriers that prevent affordable multifamily building owners and tenants from participating in programs. This includes assistance with conducting an energy assessment, selecting measures, choosing contractors, securing low-cost financing if needed, applying for incentives, making the improvements themselves, and quality assurance. This program approach avoids undue administrative burdens on program participants and can generate deeper energy savings that reduce tenant bills in a more impactful way while enabling owners to maintain affordable rents.

Q. Please describe your recommendation related to creating a one-stop-shop program design.

A. The stakeholder recommendations that emerged from the St. Louis area convenings in 2014, which Ameren has not yet endorsed, include Sub-recommendation 1.3: "Provide "one-stop shop" programs that deliver access to incentives for multiple fuels and meter types via a single access point," a topic that attracted considerable interest throughout the convening process. As the White Paper states,

> Owners and managers of affordable multifamily properties are often asked to navigate a complicated maze of programs and requirements in order to access energy efficiency incentives for their properties. Electric and gas programs may require separate applications and processes. Utilities often provide incentives for common-area spaces through participation in commercial programs, while incentives for adjacent apartments are available only through separate residential programs. […] These program design barriers and silos in delivery unnecessarily discourage participation in energy efficiency programs…

ACEEE also cites the one-stop shop model as a multifamily program best practice in its 2013 "*Apartment Hunters: Programs Searching for Energy Savings in Multifamily Buildings*" report (Attached as Exhibit B).

Q. How does Ameren Missouri's proposed MEEIA Cycle II Plan address the "one-stop shop" model?

A. Unfortunately, Ameren Missouri proposed its MEEIA Cycle II Plan before the St. Louis area stakeholder process had concluded, and the proposal does not reflect a move toward the multifamily best practice of a "one-stop shop" design. Instead, Ameren addresses multifamily affordable housing in its "Residential Low-Income" program by providing direct install measures only. These buildings may also be eligible separately for Ameren's "Business Custom" offerings. This bifurcated model (in-unit savings via one program and common-area/building systems savings via another) does not enable a whole-building approach to achieve deeper savings and Ameren does not propose to offer one-stop shop model assistance. The proposed program does not outline additional assistance in navigating the process or securing financing, etc.

Q. How do you recommend Ameren Missouri address ACEEE and the White Paper's recommendation for a one-stop shop model?

A. I recommend that Ameren amend its program to offer a single unified one-stop shop program for affordable multifamily housing that takes a whole-building approach across meters and fuels, shepherding owners through the retrofit process from start to finish.

An alternative/transitional step to a one-stop shop model is creating an affordable multifamily "one-stop portal" that creates the appearance of a unified program for building owners via creative marketing. In this approach, all eligible offerings, across residential (in-unit) and commercial (common-area/building systems) meters and across both electricity and gas would be marketed as if they were a single program. Marketing materials would reflect a single, unified program with a single application; budget allocations among residential and commercial offerings and electric/gas utilities would occur behind the curtain without the program participant's awareness. A dedicated implementer or Ameren representatives would serve as a single point of contact for program access. It would be helpful to provide an energy assessment as part of this approach and for program representatives to be trained to direct participants to additional resources (e.g. financing). As in the case of a traditional one-stop shop model, this approach would require close coordination with Laclede Gas, perhaps as part of a joint program offering(s). This option is not preferred over the traditional one-stop shop model, but is recommended as a preferable alternative to the currently proposed program design.

Q. What other recommendations are you making related to program design?

A. I recommend that Ameren incorporate two additional program design best practices into its proposed programs. First, I recommend that Ameren offer bonus incentives for affordable multifamily buildings participating in the "Business Custom" or other commercial programs. As an example, CenterPoint Energy in Minnesota (another traditionally-regulated state) currently offers a 25% bonus incentive for affordable multifamily applicants to its business programs: so, if an incentive were set at $100 dollars for a given measure, the affordable multifamily applicant would instead receive $125 (Exhibit B, p. 19).

Second, Ameren should provide owners with easy access to aggregate whole-building monthly energy usage data for their buildings. Such information is essential in enabling multifamily owners to efficiently operate their buildings and to identify energy savings opportunities. This can lead to increased participation in energy efficiency programs, especially among owners of poorly performing buildings with significant energy savings potential. Targeting resources to these buildings would help program implementers achieve the greatest "bang for the buck" and would help Ameren better achieve its MEEIA savings targets. This best practice is included in the collaborative White Paper (Exhibit A) as Sub-recommendation 3.1.

Q. And which changes to eligibility do you support for Ameren's programs for low-income and/or affordable multifamily housing?

A. I applaud Ameren for achieving a high penetration of direct install measures within its narrowly-defined target market within the low-income multifamily sector. However, this target market must be redefined in three key ways in order to ensure that Ameren's program serves the entire low-income multifamily sector. Ameren's currently-proposed eligibility standard for its "Residential Low-Income" program serves only HUD, USDA, and Public Housing customers. <u>There are approximately 124,400 affordable multifamily units (in buildings of 3+ units) in Ameren's service territory. However, Ameren has defined its target market too narrowly as just 29,100 of these units</u>, or those "participating in one or more of the federally subsidized housing programs: HUD, USDA and Public Housing." (NHT's estimate of these units is very close to Ameren's 29,100: 32,300 units.) (See Table 1-1 below.)

<u>A building's ownership or financial structure should not prevent its low-income residents from benefiting from MEEIA programs</u>. Eligibility for this program (and other programs that target low-income and/or affordable multifamily buildings) should be: 1) expanded to include unsubsidized affordable multifamily buildings; 2) expanded to include State Low Income Housing Tax Credit (LIHTC) buildings to the fullest extent allowed by statute; and 3) determined according to a flexible checklist of options that minimizes administrative burden wherever possible.

Table 1-1

Estimates of Housing Unit Counts for Missouri and the Ameren Missouri Service Territory

Utility	All Housing Units (SF+MF) Total	All Multifamily (in buildings of 3+ units) Total	Market-Rate	**Total Affordable**	*Affordable* Unsubsidized Affordable	Subsidized Affordable (HUD, LIHTC, Rural, etc.)		PHA-Owned Affordable
Missouri Statewide	2,710,506	505,058	222,929	282,129	154,877		109,488	18,260
				100%	55%		39%	6%
Ameren MO (electric)	1,150,566	252,647	128,259	**124,388**	67,711		48,587	8,378
				100%	54%		39%	7%
						LIHTC*: 24,653	Non-LIHTC: 23,934	
				100%	54%	20%	19%	7%
							Ameren's own target market estimate: 29,107	
							21,055	8,052

Sources: U.S. Census American Community Survey 5-year estimates (2009-2012), National Housing Preservation Database (NHPD) from the Public and Affordable Housing Research Corporation and the National Low Income Housing Coalition, New Market Tax Credits Census tract data, 2014 Platts Geospatial Data. Analysis by Elevate Energy and the National Housing Trust.
All subsidized information was pulled from the National Housing Preservation Database (NHPD) from the Public and Affordable Housing Research Corporation and the National Low Income Housing Coalition. This includes any property that has received at least one subsidy of any sort, including HUD, USDA Rural, LIHTC, PHA, and FHA. The "unsubsidized affordable" units are any units on low/moderate income census tracts, designated by the New Market Tax Credits, which do not have subsidies. These are calculated based on a combination of ACS 2012 5-year estimate total unit counts and the tract-level unit counts from NHPD. In some areas, the census estimates credited fewer units in total on a tract than were represented by NHPD subsidized unit records. In these cases, geocoded NHPD counts were trusted as reliable and used as total counts, so final unit estimates were slightly higher in some areas than the census data. After unit counts were determined at the census tract level, they were aggregated up to electric utility territories with 2014 Platts Geospatial Data.
*The number of LIHTC units in Ameren's service territory was determined after the original data analysis by matching federal LIHTC properties found in the National Housing Preservation Database to zip codes served by Ameren. Federal LIHTC awards closely track state LIHTC awards, so the number of federal LIHTC properties is used as a close proxy for state LIHTC properties.

Q. Why is it important that Ameren include unsubsidized affordable housing as eligible for this program?

A. Research and analysis indicate that fully 54% of affordable multifamily units in Ameren's service territory—or approximately 67,700 units—occur in <u>unsubsidized buildings.</u> Although these buildings do not receive state or federal subsidies, they are nevertheless essential in offering affordable homes to low-income residents.[1] Unsubsidized affordable units are often found in older buildings that could benefit

[1] We define unsubsidized affordable buildings as those where someone making 80% of the area median income pays no more than 30% of their income for rent plus utilities. The U.S. Department of Housing and Urban Development defines a low-income household as one making 80% of the Area Median Income and defines affordable housing costs as paying no more than 30% of income for rent plus utilities.

greatly from energy improvements. Ameren should change its target market description to make unsubsidized affordable multifamily buildings eligible for participation in Ameren's residential low-income program.

Q. Why is it important that Ameren include LIHTC units as eligible for this program?

A. There is a compelling case for the inclusion of the 24,700 State Low-Income Housing Tax Credit (LIHTC) units in Ameren's self-defined target market (see Table 1-1). While barriers may remain, a recent tweak to the MEEIA statute (Section 393.1075, RSMo.) has opened the door for Ameren to provide incentives for in-unit measures provided to low-income customers in these buildings. There is no reason to continue excluding these customers from accessing appropriate MEEIA programs.

Q. How do you recommend that Ameren modify their requirements for determining eligibility for this program?

A. In order to serve all affordable multifamily housing with the lowest administrative burden—regardless of ownership or financial structure— Ameren's revised program eligibility for low-income multifamily buildings/residents should leverage existing definitions and data. Currently, owners show eligibility by indicating which of the three subsidy types apply to their property: Ameren can expand this by providing a checklist of options for owners to establish their building's eligibility. For example, low-income may be defined by income (e.g. 80% of Area Median Income), by poverty level (e.g. 200% of Federal Poverty Level), by the eligibility of a property or tenant to participate in certain Federal, state, or local programs intended for low-income populations (e.g. Weatherization Assistance Program), or by other appropriate criteria. Wherever possible, Ameren should not require owners to collect income information: where this is necessary, Ameren should follow the precedent of its current tariff and only require the owner to establish that 51% of the building's units house low-income residents. Other potential low-burden options for establishing eligibility include blanket eligibility for buildings within certain high-poverty zip codes or Census tracts (e.g. as defined by the federal New Market Tax Credit program). This suggestion is covered in the collaborative White Paper (Exhibit A) under Sub-recommendation 4.1.

In order to achieve all cost-effective energy savings across these additional buildings, Ameren should expand its proposed budget and participation goals accordingly.

Q. You mentioned coordination with key non-utility stakeholders as the fourth area in which you recommend changes to Ameren's proposed offerings for low-income and/or affordable multifamily housing. What is your recommendation in this area?

A. Ameren should take steps to coordinate more closely with key non-utility stakeholders, regardless of which other program design changes it pursues. First, Ameren should continue to cooperate with Laclede for joint program delivery and explore ways to strengthen and streamline this collaboration.

Second, Ameren should open an ongoing dialogue with the Missouri Housing Development Commission (MHDC), a key funder of subsidized affordable housing. This will allow Ameren to better understand the unique constraints faced by subsidized buildings, to coordinate program offerings with subsidized buildings' financing cycles and periodic major rehabilitation, and to leverage MHDC's unique relationship to owners in order to better market program offerings and create a reliable pipeline of MEEIA program participants.

Third, Ameren should reach out to providers of energy efficiency financing, including Community Development Financial Institutions (CDFIs) as well as PACE districts operating within its service territory, in order to see how these offerings can be integrated into affordable multifamily buildings' MEEIA program participation.

Fourth, Ameren should seek local, state, and other partners that can fund "walk away" issues, which are building repair needs such as mold or a leaky roof, that cause an energy efficiency contractor to "walk away" from an energy efficiency project without implementing measures. These recommendations track closely with issues addressed in the White Paper included here as Exhibit A.

Q. You indicated that your testimony will address how Ameren has applied cost-effectiveness tests to low-income programs. What are your recommendations in this area?

A. The MEEIA statute (Section 393.1075.4, RSMo.) states that "Programs targeted to low-income customers or general education campaigns do not need to meet a cost effectiveness test, so long as the commission determines that the program or campaign is in the *public interest*." (emphasis added.) Therefore, I believe that low-income programs must pass a "public interest" test in order to be approved, rather than a cost-effectiveness test.

I believe that Ameren and/or the Public Service Commission should outline a methodology for determining whether low-income programs are in the public interest, and that Ameren should defend its low-income programs on this basis to the Public Service Commission. Public interest may be determined according to a diverse set of criteria, which I expect would include economic, health, stability, and comfort benefits to low-income households, reduced gas, water, and sewer expenses, reduced utility costs related to bill arrearages, customer calls, collection activities, and safety-related emergency calls, and broader societal considerations such as job creation and environmental benefits, as well as other benefits.

My understanding is that, while Ameren does not require its low-income programs to pass the Total Resource Cost (TRC) test with a value of at least 1.0, Ameren does plug the low-income program back into its portfolio-level cost-effectiveness calculations in order to ensure that the portfolio as a whole passes the TRC with a value of at least 1.0. This, in effect does subject low-income programs to a cost-effectiveness test, just with slightly less stringency. While I am not an attorney, I believe the impact of this practice is to unfairly limit the size of Ameren's low-income programs in a manner that is not supported by the MEEIA statute.

Q. You indicated that Ameren should account for the many non-energy benefits flowing from energy efficiency in low-income multifamily housing. What is your recommendation in this area?

A. I recommend that Ameren include the value of non-energy benefits (NEBs) regardless of whether Ameren ultimately uses the TRC or a public interest test.

Utility regulators across the country are increasingly recognizing that substantial non-energy benefits—or co-benefits—occur as a result of energy efficiency improvements, and that utilities should attempt to quantify the value of these benefits for inclusion in cost-effectiveness tests. In the affordable multifamily sector, these benefits serve many public policy objectives and may include:

- utility benefits such as reduced arrearage carrying costs, reduced customer collection calls/ notices, reduced termination/reconnection costs, and reduced bad debt write-offs;
- societal benefits such as economic development, job creation, energy security, reduced emissions and environmental impacts, reduced health care spending, and maintenance of affordable housing;
- participant benefits such as water/wastewater bill savings, reduced maintenance costs, lower turnover rates, increased comfort, increased durability, improved safety, and improved health (e.g. less asthma resulting in fewer work/school sick days);
- and other additional benefits.

Quantifying NEBs/co-benefits can enable Ameren to more accurately value the benefits of proposed programs and could allow Ameren to direct MEEIA program resources toward high-benefit energy efficiency improvements in multifamily affordable housing.

Recognizing that it can be difficult to accurately measure NEBs/co-benefits,[2] but that it is nevertheless important to incorporate them, many states rely on so-called "adders" wherein the benefits side of a utility cost-effectiveness equation is multiplied by an adder that reflects a conservative estimate of benefits. The following states use adders of between 7.5% and 25%: Colorado, Iowa, New York, Oregon, Vermont, Washington, and the District of Columbia. In total, at least 17 states and the District of Columbia allow the incorporation of certain NEBs/co-benefits via adders or other methods.[3] Additionally, utilities in Illinois began using NEBs adders in 2014.

Although I am not an attorney, my reading of the MEEIA rules is that Ameren is in no way restricted from including non-energy benefits (NEBs) in its cost-effectiveness testing, and therefore Ameren should begin doing so. For administrative ease, I recommend the use of a NEBs adder, at a minimum for low-

[2] There are several methods for quantifying NEBs/co-benefits, including engineering/modeling estimates, incremental incidence/marginal valuation estimates, and specialized comparative/ranking surveys.

[3] Skumatz, Lisa A., Ph.D., 2014. "Non-Energy Benefits / Non-Energy Impacts (NEBs/NEIs) and Their Role & Values in Cost-Effectiveness Tests: State of Maryland", prepared for Natural Resources Defense Council (NRDC), Superior, CO, March.

income programs. For example, Colorado has a 10% NEBs adder for utility energy efficiency programs and a 25% NEBs adder for <u>low-income</u> utility energy efficiency programs.

Q. Please summarize your testimony.

A. Over the last year I have been encouraged to see local stakeholders express high interest in energy efficiency in multifamily affordable housing. I look forward to working alongside these stakeholders, including Ameren and the Public Service Commission, to break down barriers and develop innovative solutions for serving this hard-to-reach sector.

I commend Ameren's Cycle I decision to create a program targeted at affordable multifamily housing. However, I find that Ameren's proposed Cycle II offerings for multifamily affordable housing (the Residential Low-Income" program, and also Commercial offerings for which affordable multifamily housing is eligible) do not include many best practices for this sector. I urge Ameren to implement, and the Public Service Commission to support, the recommendations I have outlined, which are:

1. Serve multifamily housing with its own targeted program, separately from other building types;
2. Offer a one-stop shop program for affordable multifamily housing that takes a whole-building approach across meters and fuels, shepherding owners through the retrofit process from start to finish (or, as a less-preferred alternative/transitional step, a one-stop shop portal);
3. Offer bonus incentives for affordable multifamily buildings participating in the "Business Custom" or other commercial programs;
4. Provide owners with easy access to aggregate whole-building monthly energy usage data for their buildings;
5. Expand the eligibility for affordable multifamily buildings to include all of the approximately 124,400 affordable multifamily units (in buildings of 3+ units) in Ameren's service territory, including the following buildings not currently eligible for low-income progams:
    a. Unsubsidized affordable multifamily buildings: approximately 67,700 units, and
    b. State LIHTC buildings (to the fullest extent allowed by statute): approximately 24,700;

6. Leverage existing definitions and data to provide a flexible checklist of options for owners to establish their building's eligibility for low-income offerings;
7. Continue to cooperate with Laclede for program delivery;
8. Open an ongoing dialogue with the Missouri Housing Development Commission in order to coordinate program offerings and create a reliable pipeline of MEEIA program participants;
9. Reach out to providers of energy efficiency financing, including Community Development Financial Institutions (CDFIs) and PACE programs in order to see how these offerings can be integrated into affordable multifamily buildings' MEEIA program participation;
10. Seek local, state, and other partners that can fund "walk away" issues;
11. Outline a methodology for determining whether low-income programs are in the public interest, and defend low-income programs on this basis to the Public Service Commission; and finally;
12. Include the value of non-energy benefits (NEBs) regardless of whether Ameren ultimately uses the TRC or a public interest test.

Q. Does this conclude your rebuttal testimony?

A. Yes it does.

BEFORE THE PUBLIC SERVICE COMMISSION
OF THE STATE OF MISSOURI

In the Matter of Union Electric Company d/b/a Ameren Missouri's 2nd Filing to Implement Regulatory Changes in Furtherance of Energy Efficiency as Allowed by MEEIA	))))	File No. EO-2015-0055

AFFIDAVIT OF ANNIKA BRINK

CITY OF WASHINGTON,

DISTRICT OF COLUMBIA

Annika Brink, being first duly sworn on her oath, states:

1. My name is Annika Brink. I work in the City of Washington, District of Columbia and I am employed by The National Housing Trust as Energy Efficiency Advisor.
2. Attached hereto and made a part hereof for all purposes is my Rebuttal Testimony on behalf of The National Housing Trust, which has been prepared in written form for introduction into evidence in the above-referenced docket before the Missouri Public Service Commission.
3. I hereby swear and affirm that my answers contained in the attached testimony to the questions therein propounded are true and correct.

Annika Brink

Annika Brink

District of Columbia: SS
Subscribed and sworn to me this 20th day of March, 2015

Josh Zinman

Notary Public
Joshua Zinman, DC

My commission expires: January 31, 2020

JOSHUA ZINMAN NOTARY PUBLIC EXP. 1-31-2020 DISTRICT OF COLUMBIA