

Exhibit No.:
Issue(s): Low Income Programs
Witness: Amy L. Eichholz
Sponsoring Party: MoPSC Staff
Type of Exhibit: Rebuttal Testimony
Case No.: GR-2024-0369
Date Testimony Prepared: April 4, 2025

MISSOURI PUBLIC SERVICE COMMISSION

INDUSTRY ANALYSIS DIVISION

ENERGY RESOURCES DEPARTMENT

REBUTTAL TESTIMONY

OF

AMY L. EICHHOLZ

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

CASE NO. GR-2024-0369

*Jefferson City, Missouri
April 2025*

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OF

AMY L. EICHHOLZ

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

CASE NO. GR-2024-0369

Q. Please state your name and business address.

A. My name is Amy L. Eichholz, and my business address is Missouri Public Service Commission, P. O. Box 360, Jefferson City, Missouri 65102.

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

A. I am employed by the Missouri Public Service Commission (“Commission”) as a Research/Data Analyst of the Energy Resources Department.

Q. What is your educational background and work experience?

A. Please refer to the attached Schedule ALE-d1.

Q. Have you previously filed testimony before this Commission?

A. Yes. Please also refer to the attached Schedule ALE-d1 for a list of cases in which I have previously participated in.

Q. What is the purpose of your rebuttal testimony?

A. The purpose of my rebuttal testimony is to briefly discuss certain aspects of income eligible programs discussed in the direct testimony of Union Electric d/b/a Ameren Missouri (“Ameren Missouri”) witness Ms. Shelly Harmon.

ENERGY EFFICIENCY PROGRAM

Q. Briefly describe Ameren Missouri witness Shelly Harmon's recommendations for Ameren Missouri's natural gas energy efficiency programs.

1 A. In her direct testimony¹, Ms. Harmon proposes changes to Ameren Missouri's
2 natural gas energy efficiency program, which currently only consists of the Pay As You Save
3 (PAYS®) program. Ms. Harmon is proposing expansion of the natural gas program to also
4 include single-family and multi-family income-eligible natural gas programs for co-delivery
5 with the electric programs. To establish boundaries on incentives for co-delivered measures,
6 Ms. Harmon proposes adopting a similar approach as the Ameren Missouri electric programs
7 by filing a specified incentive range within which payments will be made. Ms. Harmon also
8 proposes to continue to apply the same savings assumptions for natural gas measures used by
9 Spire Missouri Inc. d/b/a Spire ("Spire"), as Spire natural gas programs are evaluated by a third-
10 party evaluator. Savings will be determined for each custom measure through an individualized
11 assessment and cost will be based on the savings for each measure, with the savings
12 assumptions derived from Spire's evaluated savings assumptions.

13 Q What is the proposed co-delivered multi-family and single-family income-
14 eligible program offerings?

15 A. The multi-family income-eligible program offering will use a one-stop shop
16 concierge approach to assist property owners through the process of applying for and securing
17 energy efficiency upgrades using a single application. The program helps multi-family property
18 managers understand their buildings energy usage amounts, achieve immediate energy savings
19 through low or no-cost direct install water consumption reduction and heat retention measures,
20 and move beyond initial measures to investments in standard and/or custom measures for
21 common areas, building shell, and whole-building systems to benefit from deeper
22 energy savings.

¹ Direct Testimony of Shelly Harmon page 2, lines 9-15

1 The single-family income-eligible program will be offered to residential
2 customers residing in single family detached housing, duplexes, and mobile homes
3 (wood-frame bolted to steel chassis, designed to be transported). The program will use a
4 targeted neighborhood approach and collaborate with community-based organizations to
5 identify income-eligible areas with the greatest need such as those with high energy usage, and
6 high incidence of arrearages or payment delinquencies. The program will provide energy
7 assessments and/or diagnostic testing and install a comprehensive package of whole house
8 energy saving measures at no cost to customers.

9 Q. Are the income-eligible and multi-family customers eligible to participate in
10 this program?

11 A. Approved participants will be required to meet one of the following income
12 eligibility requirements:

13 1. Reside in federal, state, or local subsidized housing and fall within the
14 subsidized housing program's income guidelines.

15 2. Reside in non-subsidized housing with proof of income levels at or below
16 80% of median income.

17 3. Fall within a census tract that indicates at least 85% of customers are at or
18 below 80% of median income.

19 4. Targeting underserved communities in Ameren Missouri's list of income-
20 eligible census tracts.

21 With respect to a multi-family program, where multi-family property does not
22 meet one of the income eligibility criteria listed above, and as a combination of qualifying

1 tenants and non-qualifying tenants, at least 50% of the tenants must be eligible to qualify the
2 entire property.

3 Q. Why is Ms. Harmon proposing to expand the natural gas energy efficiency
4 program to include income-eligible programs?

5 A. Ms. Harmon is concerned that the PAYS® program may underspend its
6 annual budget². With Ms. Harmon's proposed expansion of the natural gas energy efficiency
7 program, it will be able to provide energy efficiency opportunities to a wider network of
8 income-eligible customers.

9 Q. Will any of Ms. Harmon's proposals affect the revenue requirement for
10 Ameren Missouri?

11 A. No, there will be no impact on Ameren Missouri's revenue requirement request
12 in this current general rate case compared to the revenue requirement used to set rates in
13 Ameren Missouri's last general rate case. Ms. Harmon is proposing to keep the current base
14 annual funding amount of \$700,000, and keep the current allocation to energy efficiency
15 programs at \$450,000 and keep the current allocation for weatherization agencies at \$250,000.

16 Q. Does Staff support Ms. Harmon's proposal to expand the natural gas energy
17 efficiency program to not only include the residential PAYS program but also include income-
18 eligible programs to be co-delivered with the electric programs?

19 A. Yes, Staff supports Ms. Harmon's proposals regarding the co-delivery of
20 income-eligible programs. Ameren Missouri currently co-delivers natural gas programs for the
21 income-eligible programs with Spire. Ameren Missouri also previously co-delivered income-
22 eligible programs with its electric and natural gas programs from September 2019 through

² Direct Testimony of Shelly Harmon page 3, lines 14-19

Rebuttal Testimony of
Amy L. Eichholz

1 January 2022. The natural gas program changed to a PAYS® only natural gas program in
2 February 2022. Ms. Harmon is not proposing additional funding, but instead proposing an
3 option for any potential unspent PAYS® budget to be used.

4 Q. Does this conclude your rebuttal testimony?

5 A. Yes.

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-2024-0369

AFFIDAVIT AMY L. EICHHOLZ

STATE OF MISSOURI)
) ss.
COUNTY OF COLE)

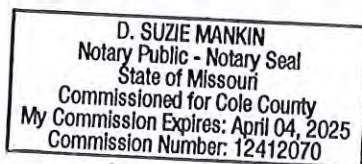
COMES NOW AMY L. EICHHOLZ and on her oath declares that she is of sound mind and lawful age; that she contributed to the foregoing *Rebuttal Testimony of Amy L. Eichholz*; and that the same is true and correct according to her best knowledge and belief.

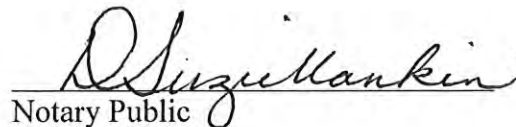
Further the Affiant sayeth not.


AMY L. EICHHOLZ

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 31st day of March 2025.




Notary Public