

Exhibit No.:
Issue(s): Overview of Energy
Assistance;
Income-Eligible Bill
Discount
Witness: Page Selby
Type of Exhibit: Direct Testimony
Sponsoring Party: Union Electric Company
File No.: ER-2026-0291
Date Testimony Prepared: June 26, 2026

MISSOURI PUBLIC SERVICE COMMISSION

FILE NO. ER-2026-0291

DIRECT TESTIMONY

OF

PAGE SELBY

ON

BEHALF OF

UNION ELECTRIC COMPANY

D/B/A AMEREN MISSOURI

**St. Louis, Missouri
June, 2026**

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DIRECT TESTIMONY

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I. INTRODUCTION

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Q. Please state your name and business address.

2

3 A. My name is Page Selby, and my business address is One Ameren Plaza,
4 1901 Chouteau Avenue, St. Louis, Missouri 63103.

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Q. What is your position with Ameren Missouri?

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6 A. I am Manager, Customer Advocacy for Union Electric Company d/b/a
7 Ameren Missouri ("Ameren Missouri" or the "Company").

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

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10 A. I have a B.A. in Economics and Business Administration from Illinois
11 College, and a Chancellor's Certificate in Economic Development from University of
12 Missouri-St. Louis. I have 38 years of experience in customer service and marketing. Prior
13 to joining Ameren, I was the Vice President of Marketing and Training for Mercantile Bank
14 of Illinois, and a consultant for Merger/Acquisition Communications and Compliance. In
15 2014, I joined Ameren Missouri's Business and Community Development team then led
16 customer program development for the Smart Meter Project. I transitioned to my current
17 role in 2021, responsible for the ongoing development, planning, management, and
18 communication of Ameren Missouri's customer advocacy strategy, including programs,
19 outreach, budget oversight, and relationships with community agencies.

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1 **Q. What is the purpose of your Direct Testimony?**

2 A. I provide an overview of Ameren Missouri's energy assistance programs
3 and support the proposed Income-Eligible Bill Discount (hereinafter, "Discount")
4 Program.

5 **II. ENERGY ASSISTANCE OVERVIEW**

6 **Q. What is energy assistance?**

7 A. Energy assistance refers to programs that are used to support eligible
8 households in maintaining safe and continuous access to energy. Energy assistance directly
9 impacts customer affordability and stability by keeping essential services on and
10 preventing disconnections which can trigger larger crises, reducing financial hardship
11 through one-time grants, ongoing bill credits, arrearage forgiveness and energy efficient
12 weatherization improvements, ultimately improving customer outcomes by reducing stress
13 and financial pressure for vulnerable customers.

14 **Q. What are the Company's guiding principles for energy assistance**
15 **programs?**

16 A. There is no "one-size fits all" approach. To help customers facing
17 challenges, we currently offer a menu of assistance programs in coordination with energy
18 assistance agencies, community outreach and education, and a simplified application and
19 pledge process. Ameren Missouri's approach to energy assistance programs is guided by a
20 set of principles focused on improving affordability, supporting customer stability, and
21 ensuring effective use of resources. Central to this approach is reducing energy burden by
22 providing meaningful and consistent bill relief to customers with demonstrated financial
23 need, as well as energy education. As reflected in existing program design, including

1 Ameren Missouri's Keeping Current Program, the Company emphasizes structured,
2 ongoing assistance – such as bill credits, arrearage management, and budget billing to
3 promote on-time payment behavior and long-term customer stability. Ameren Missouri
4 also relies on strong partnerships with community agencies and stakeholders to deliver
5 programs efficiently, coordinate eligibility verification and connect customers with
6 complementary resources such as federal Low Income Home Energy Assistance Program
7 ("LIHEAP") and Weatherization, recognizing that comprehensive support is necessary to
8 address both immediate affordability challenges and long-term energy use. As explained
9 further below, these guiding principles support the proposed Discount Program as a logical
10 extension of existing efforts, providing a scalable and transparent mechanism to deliver
11 consistent bill relief aligned with customers' ability to pay.

12 **Q. How much assistance is distributed to Ameren Missouri customers?**

13 A. In 2025, over 107,000 pledges¹ through one or more programs totaled more
14 than \$37 million in assistance for our most vulnerable customers. So far in 2026 (through
15 May 31, 2026), there have been more than 48,000 pledges totaling over \$16 million.

16 **Q. Please summarize Ameren Missouri's current menu of assistance**
17 **programs.**

18 A. Ameren Missouri provides customers with the following assistance options:

19 LIHEAP: LIHEAP is a federally funded program assisting income-eligible
20 households with paying their utility bills through either the Energy Assistance ("EA")
21 and/or Emergency Crisis Intervention ("ECIP") programs. EA provides a one-time
22 payment of \$318 for the customer's electric heating or cooling bills, October through May.

¹ A "pledge" is a payment credited to a customer's account.

1 Customers in financial crisis and in threat of disconnection may receive additional
2 assistance of up to \$300 for summer energy costs and up to \$800 for winter energy costs
3 through ECIP. In fiscal year 2025, LIHEAP benefits were delayed which resulted in higher
4 pledges in January through March. Through May 31, 2026, over 17,000 customers have
5 received over \$5.4 million in EA assistance, and over 11,000 have received \$5 million in
6 ECIP assistance.

7 Keeping Cool: Keeping Cool provides a \$50 bill credit for the four summer months
8 of May through September to senior citizens, those with children under 5, or customers
9 who have a disability or chronic medical condition with income eligibility at 250% of the
10 Federal Poverty Level ("FPL"). This increased income eligibility is designed to assist those
11 customers ineligible for LIHEAP. In 2025, over 1,100 bill credits totaling \$251,750 were
12 provided to customers. Through May 31, 2026, over 700 customers have received
13 approximately \$52,000 in bill credits.

14 Keeping Current: Keeping Current provides up to twelve monthly bill credits of
15 \$35 – \$90 annually, based on income and home heating eligibility criteria, along with
16 arrearage forgiveness that helps make energy bills more affordable for our vulnerable
17 customers. Eligibility is based on household size and income and aligns with LIHEAP and
18 Weatherization at 200% of the FPL — to make it easier for customers to bundle benefits
19 from numerous programs. The combined funding for Keeping Cool and Keeping Current
20 increased to \$6.0 million annually in June of 2025, 50% of which is funded by shareholders
21 "below the line" and therefore not reflected in the Company's revenue requirement. In
22 2025, 7,575 customers enrolled and received \$5.4 million in bill credits with 5,349 of those
23 customers also receiving arrearage credits of approximately \$1.3 million. Keeping Current

1 and Keeping Cool enrollments were paused in May 2025 due to budget limits, but
2 enrollments were resumed in July 2025 for Keeping Cool, and November 2025 for Keeping
3 Current re-enrollments. From January 1, 2026, through May 31, 2026, over 4,000
4 customers are enrolled and have received \$1.4 million in bill credits with nearly 1,300 of
5 those customers also receiving arrearage credits of approximately \$116,000. In 2025 and
6 2026, Ameren Missouri increased communication and focused customer education on
7 bundling program benefits. The Keeping Current Collaborative, including representation
8 from Ameren Missouri, Legal Services of Eastern Missouri, Consumers Council of
9 Missouri, Community Action Agency of St. Louis County, People's Community Action
10 Corporation, Missouri Community Action Network, Missouri Public Service Commission
11 Staff, and the Missouri Office of Public Counsel, meets quarterly to review program
12 enrollment and challenges, and develop strategies for continued success. Changes
13 implemented June 1, 2025, include:

- 14 • Reducing program term from 24 months to 12 months, allowing customers with
15 budget billing arrearages to roll the arrearage into the next program year to
16 maintain a consistent, affordable monthly budget bill amount;
- 17 • Allowing three missed payments rather than two consecutive missed payments
18 before removal from the program, allowing customers to receive LIHEAP ECIP
19 without being removed from the program; and
- 20 • Agency incentives increased \$5/per customer to \$25 for enrollment and \$15 for
21 completion.

22 Weatherization Assistance: This program, administered through the Missouri
23 Community Action Agencies, provides weatherization home improvements (such as

1 caulking, water heater jackets, weather stripping, and insulation) to qualifying income-
2 eligible homeowners and renters, based on household size and income up to 200% of the
3 FPL. In addition, Ameren Missouri's Income-Eligible Weatherization Assistance Program
4 ("IEWAP") for electric customers weatherization increased in June 2025 to \$2 million
5 annually, funded 50% from the Company and 50% through the Low-Income Pilot Program
6 Charge. IEWAP funds may be used for weatherization readiness, for properties deferred
7 due to the date of their last weatherization, or for addressing health and hazard conditions.
8 We request all agencies that enroll customers in Keeping Current/Keeping Cool also refer
9 customers to both the Weatherization and LIHEAP programs. These funds continue to be
10 fully utilized year-over-year.

11 Critical Medical Needs Pilot Program: Consistent with commitments made by
12 Ameren Missouri in a settlement agreement in File No. ER-2021-0240 in 2022, Ameren
13 Missouri, along with utilities Spire, Evergy, Liberty, and Missouri-American Water,
14 community action agencies, the United Way, and other signatories, developed a pilot,
15 Critical Medical Needs Program, with the goals of streamlining and expediting the
16 processes to help critical needs customers stay connected to utility services. In partnership
17 with United Way chapters throughout the state, Ameren Missouri shareholders provide
18 \$250,000 annually with another \$250,000 collected from customers through the Low-
19 Income Pilot Program Charge, for a total of \$500,000, toward maintaining an assistance
20 hub for medical professionals and customers, including a streamlined application and
21 training for United Way's patient/customer "navigators" who work to bundle multiple
22 program benefits. Benefits for customers include pausing disconnects for at least 30 days
23 and securing assistance for multiple utility bills. Consistent with paragraph 17 of the

1 Stipulation and Agreement approved by the Commission in File No. ER-2024-0319, the
2 Critical Needs Program was updated to allow Program funds to be the first bill assistance
3 dollars utilized, rather than first submitting applications for other programs. \$100,000 of
4 Critical Needs Program funds was allocated to a statewide third-party evaluation of the
5 Program, led by Ameren Missouri, completed by Apprise Q12026, and presented to
6 stakeholders Q2026. The stakeholder collaborative group² continues to meet quarterly to
7 review recommendations and develop action plans.

8 Rehousing Pilot "New Start Energy Relief": The Rehousing Pilot "New Start
9 Energy Relief" Program targets formerly homeless populations with previous Ameren
10 Missouri utility debt who are establishing new service with Ameren Missouri. Up to \$1,000
11 per customer is allowed, including a credit of up to \$500 on future bills. Funding for this
12 pilot is \$500,000 annually, with 50% from the Company and 50% through the Low-Income
13 Pilot Program Charge. Nineteen agency partners offer the program and focus on bundling
14 it with other programs, including LIHEAP, Keeping Current/Keeping Cool, and
15 Weatherization. In 2023, \$98,000 was awarded to 191 customers, and in 2024, \$162,146
16 was awarded to 295 customers. On June 1, 2025, changes to the program were
17 implemented to address the underutilization of funds, including adding individuals in
18 domestic violence shelters and seniors in threat of public housing eviction due to threat of
19 utility service disconnection. In addition, following the May 2025 storms that impacted

² The Critical Medical Needs Stakeholder Collaborative Group includes representatives from Ameren Missouri, Spire Energy, Evergy, Liberty Utilities, Missouri American Water, Summit Utilities, United Way of Greater St. Louis, United Way of Kansas City, Missouri Department of Social Services – LIHEAP, Missouri Public Service Commission Staff, Missouri Office of Public Counsel, Legal Services of Eastern Missouri, Missouri Community Action Network, Sierra Club, Consumer's Council of Missouri, Renew Missouri, Tower Grove Development Corporation, Missouri Department of Natural Resources – Weatherization, People's Community Action Corporation, Community Action Agency of St. Louis County, and St. Louis Integrated Health Network.

1 Ameren Missouri service territories, Rehousing funds were made available to customers
2 who were homeless due to the storms. These changes contributed to a significant increase
3 in program spend, especially following an outreach event in the city of St. Louis in
4 September where over \$100,000 was pledged to storm survivors. In 2025, \$410,000 was
5 utilized to assist 772 customers in rehousing, and so far in 2026 (through May 31, 2026),
6 157 customers have received just over \$107,000. The Rehousing Pilot program targets a
7 specific subset of vulnerable customers but addresses the same issue (arrearages) as other
8 existing programs. In addition, we continue to receive feedback that this program's
9 eligibility and arrearage benefits are confusing to both customers and administering
10 agencies, contributing to the under-utilization of program funds. As a result of this
11 feedback, my recommendation would be to eliminate this program and reallocate the
12 shareholder funding to other programs that address arrearages and bill assistance, which
13 supports the Income-Eligible Bill Discount proposal described more fully in Company
14 witness Dr. Nicholas Bowden's Direct Testimony and below.

15 Dollar More: The Dollar More program is funded 100% through donations from
16 customers and employees, historically around \$100,000 per quarter, with the Company
17 contributing an additional \$2 million of shareholder funds in December 2025. Eligibility is
18 simply any customer that is currently past due, with income eligibility increased to 300%
19 FPL in December 2025 to assist those customers struggling but above LIHEAP income
20 eligibility. In 2025, over 2,400 customers received over \$637,000 in assistance, and so far
21 in 2026 (through May 31, 2026), over 3,800 customers have received over \$1.3 million in
22 assistance.

1 Veterans Energy Assistance Program: Through a partnership with United Way 2-
2 1-1, Ameren Missouri shareholders provide \$25,000 annually for this program, and
3 increased funding three times in 2025 for a total of \$275,000. Active-duty military,
4 veterans or their spouses, can receive up to \$600 annually to help pay past-due utility bills.
5 There is no income eligibility. In 2025, 308 customers received \$123,577, and so far in
6 2026 (through May 31, 2026), 182 customers have received \$74,761, in assistance.

7 Energy Relief Grant Program: In response to 2025 summer bills, Ameren Missouri
8 made \$2 million in shareholder funds available to community action agencies in August
9 2025 to distribute \$150 to any customer with a bill of at least \$150 and "in need" as
10 determined by agency partners. So far, through May 31, 2026, \$1.93 million (97% of
11 available funds) has been awarded to 12,850 customers.

12 **Q. Did Ameren Missouri provide any additional bill relief funds after the**
13 **May 2025 St. Louis-area tornado?**

14 A. Yes. In addition to \$750,000 to community organizations to assist in
15 ongoing recovery efforts for survivors of the May 16, 2025 tornado, on May 23, 2025,
16 Ameren Missouri provided the following energy assistance support to storm survivors
17 throughout the entire service territory:

- 18 • Dollar More Disaster Relief: provided \$200,000, for customers with active
19 service experiencing hardship due to the storms, income up to 300% FPL
20 and up to \$500 per customer;
- 21 • New Start Energy Relief: increased eligibility to include anyone displaced
22 due to the storms and reestablishing electric service;
- 23 • Weatherization: allowed use of IEWAP funds for certain storm repairs;

- 1 • Special 20% down payment arrangements instituted through August 2025;
2 and
3 • Ameren Missouri held four outreach events for customers in the St. Louis
4 area in September 2025, wherein 1,290 customers were connected with
5 assistance totaling \$255,155 across several programs.

6 **Q. Please describe the other outreach events the Company holds.**

7 A. Ameren Missouri holds local outreach events focused on providing one-on-
8 one application assistance, personalized energy education, and energy assistance tools to
9 maximize each customer's benefits. Every customer receives an exit interview to ensure
10 their needs were met and they feel set up for future success. Events are scheduled in
11 vulnerable communities with local agency partners and promoted through targeted social
12 media. In 2025, 1,866 customers received over \$426,000 at 50 outreach events. Successful
13 examples in 2026 are the Jefferson City event where 220 families received \$47,000 in
14 assistance and the St. Louis City event where 300 families received \$87,000 in assistance.

15 In addition, we're seeing growing attendance at our monthly three-part online
16 webinar series focusing on Crisis Assistance Programs, Reducing your Energy Bill
17 Programs and Tools, and Programs for Medical Challenges, promoted at events, on our
18 website, and through targeted social media.

19 **Q. Could you please summarize the Company's efforts at assisting lower-**
20 **income customers?**

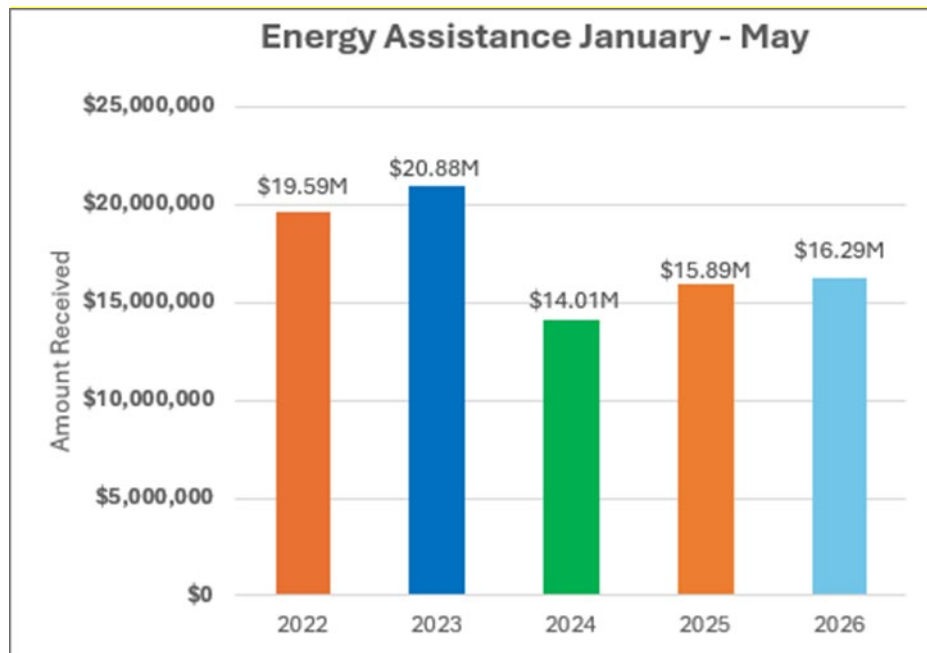
21 A. Yes. Ameren Missouri's efforts reflect a comprehensive, multi-layered
22 strategy that combines direct bill assistance, program integration and continuous
23 improvement with proven results to improve affordability, reduce energy burden, and

1 promote long-term customer energy stability. A key strength of Ameren Missouri's
2 approach is the coordination across programs and partnerships. The Company works
3 closely with agency partners and stakeholders to streamline eligibility, bundle benefits, and
4 connect customers to multiple resources. Through ongoing communication with agencies
5 and stakeholder collaboratives to review performance, the Company identifies challenges
6 and implements program improvements ensuring that assistance remains responsive and
7 effective.

8 Figure 1 below summarizes energy assistance for the first five months, January to May, of
9 each year from 2022 and thereafter. 2022 and 2023 reflect an increase in funding due to
10 the American Rescue Plan that included doubled LIHEAP benefits. 2024 (and thereafter)
11 reflect the return to pre-pandemic funding:

12

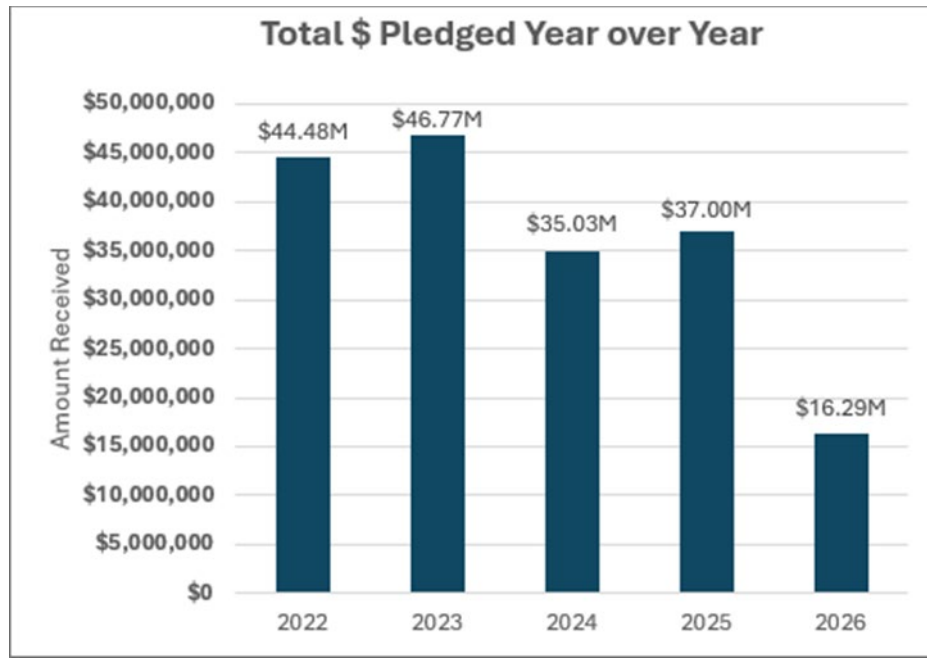
Figure 1



13

1 Figure 2 summarizes energy assistance on a calendar year basis starting in 2022 and
2 thereafter. 2022 and 2023 reflect increased funding due to the American Rescue Plan and
3 doubled LIHEAP benefits. 2026 is through May; the Company is projecting a total of
4 \$38 million for all of 2026:

5 **Figure 2**



6

7 **III. INCOME-ELIGIBLE BILL DISCOUNT PROPOSAL**

8 **Q. With so many assistance efforts already successful, why is Ameren Missouri**
9 **proposing an income-eligible discount rate?**

10 A. The proposed Discount Program represents a logical and necessary extension of
11 Ameren Missouri's current approach. By providing consistent, predictable bill relief
12 aligned with a customer's energy burden, the discount rate builds upon existing programs
13 while addressing remaining gaps in affordability. It complements—not replaces—the
14 Company's menu of assistance offerings by creating a scalable, transparent framework that

1 enhances program effectiveness, simplifies customer access to support, and reinforces
2 long-term financial stability.

3 **Q. How did the Company develop its income-eligible residential bill discount**
4 **proposal recently authorized under Senate Bill 4 (2025) as soon as practicable?**

5 A. With the passage of Senate Bill 4 (2025), Ameren Missouri gained the
6 opportunity to propose a special alternative residential customer rate or discount. The
7 Commission commenced a working docket, File No. OW-2026-0085, to review currently
8 existing utility assistance programs and gather information on how to best implement the
9 special alternative residential customer rates or bill discounts under Section 393.1680,
10 RSMo. That working docket is ongoing, already sought inventories of utility assistance
11 programs, and held an in-person workshop to discuss utility assistance program design. I
12 attended and presented at the in-person workshop held on June 2, 2026.

13 Ameren Missouri has participated in that working docket and appreciates the
14 opportunity to continue its participation. However, Ameren Missouri did not want to miss
15 the opportunity to propose an income-eligible discount option for residential customers
16 until conclusion of the working docket and the Company's subsequent rate review.
17 Therefore, we developed our proposed Discount Program to be submitted in this case in
18 hopes eligible customers could begin receiving the benefits of the discount as soon as
19 practicable but recognize that we can/will address the future conclusions from the working
20 docket in this and/or a future rate review. As noted in Company witness Robert Dixon's
21 Direct Testimony, the Company remains open to working with all parties to this case and
22 the working docket to refine the Discount proposal.

1 A deliberate constraint placed on any proposal to be developed was that it had to
2 be designed in a way to not further increase costs for other customers, i.e. net neutral bill
3 impact for non-income-eligible customers. Therefore, the process of developing our
4 proposed Discount included completing an objective assessment of all existing assistance
5 programs (their eligibility parameters, funding sources, participation levels, etc.). Our
6 assessment found that the Keeping Current program with both bill credit and arrearage
7 assistance is the gold standard of programs, compared to other programs that have not
8 produced the same success and long-term results. Our proposal consequently adopts and
9 builds on components from our highly successful Keeping Current program and reallocates
10 funds from under-performing programs to better target assistance.

11 Company witness Bowden explains the Income-Eligible Bill Discount Program
12 proposal parameters and objectives, and presents illustrative tariff sheets in his Direct
13 Testimony. To summarize though, instead of flat monthly credits and a single income
14 eligibility threshold as provided under the Keeping Current program, the Income-Eligible
15 Residential Bill Discount is based on a percentage of base rate billing components and is
16 graduated so that customers whose income is 150% or below the FPL may receive the
17 higher 20% discount while a customer's whose income is above 150% but below 200% of
18 the FPL may receive the lower 10% discount. This proposal would mean that Ameren
19 Missouri's most economically vulnerable customers who enroll will not experience a base
20 rate increase, as it would be more than offset by the Discount. The Discount will be funded
21 through reallocation of existing funding so that non-eligible customers will not see any
22 increase in their bills as a result of the Discount as proposed.

1 **Q. Do you think the Company's proposed Discount Program and**
2 **corresponding changes to the Keeping Current heating bill credit sub-program and**
3 **elimination of the New Start Energy Relief Program should be approved in this**
4 **proceeding?**

5 A. Yes. The Discount and related program/funding changes improve payment
6 consistency and financial stability for customers most in need, promote long-term
7 affordability and essential service stability, and do so without transferring costs to non-
8 eligible customers. However, as the working docket OW-2026-0085 progresses, we are
9 happy to further refine our proposal in future rounds of testimony in this case as well.

10 **Q. Does this conclude your Direct Testimony?**

11 A. Yes, it does.

