



GRO- Grass Roots Organizing
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June 14, 2004

To: The Missouri Public Service Commission

From: GRO- Grass Roots Organizing

Regarding: Commission Case No. GX-2004-0496

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**Missouri Public
Service Commission**

GRO-Grass Roots Organizing is a 501C-3 nonprofit organization in Mid-Missouri that has over 300 members living in the area. Most of our families are at or below the federal poverty level. Day in and day out, they struggle for stability and survival. Keeping utilities connected and getting them reconnected is a large part of that struggle.

GRO recommends the following changes to the Missouri Cold Weather Rule:

- First and foremost, we strongly ask that the Missouri's cold temperature moratorium be revised to, "will drop below 40 degrees Fahrenheit". Even though hypothermia can occur even at 40 degrees, increasing the cutoff degrees from 30 to 40 lessens the danger. We know that our Missouri people awaiting their final Federal disability approval (those on General Relief), the disabled, sick, elderly, and children are especially vulnerable to hypothermia at 30 degrees.

The utility companies contend that they do everything they can to prevent the shutoff of low-income disabled and elderly during the cold weather period, but they do not want this moratorium "codified in the law." That means that there is no statute to prevent shutoff at 30 degrees for these vulnerable populations. Without a clear and consistent public policy, utility companies under stress for payment in difficult economic times and/or with volatile energy costs may decide that the 'bottom line' overrules their 'charitable instincts' for these vulnerable populations. Also, children are a vulnerable population not protected or considered under the 'charitable conditions' the utilities contend they use to forestall the disabled and elderly from shutoff.

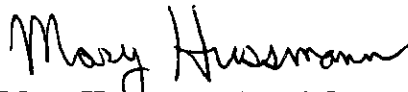
It is time-consuming, bureaucratic, and expensive to educate, screen, track, and continuously verify if a person is eligible for a 'most vulnerable population' category. The most responsible and efficient thing to do is to protect all customers by raising the temperature threshold to 40 degrees Fahrenheit.

- If a family has been shutoff, we request that more realistic payment plan option(s) for reconnect be implemented right away. It is well known that many current payment plans are wildly 'out of reach', but low-income families, desperate to keep their utilities connected, will sign these agreements.
Many low-income families are being asked to pay a staggering 38% of their annual incomes for their home energy bills. Ultimately, the Missouri PSC must, as many states have, adopt a "Universal Service Program".
- The Missouri Public Service Commission should find ways to mandate that all Missouri municipalities abide by the MO Cold Weather Rule. In fairness, the ruling should apply to public and private utilities. After July 9, 2004, we request a listing of municipalities in Missouri that do not conform to the state's Cold Weather Rule.
- Increased efforts should be made to educate utility CEO's, their employees, stockholders, and the entire Missouri public about the value of the "Cold Weather Rule". We propose that all utility companies be required every year to inform their customers (in writing) of the "Cold Weather Rule". This is especially important because of the positive changes we are hopeful the PSC will soon pass.
- We further ask that, as soon as possible, the PSC establish a "Hot Weather Rule". Exposure to high temperatures, especially in the vulnerable populations, causes illness' and deaths that are entirely avoidable under properly established and enforced "Hot Weather Rules".

Everyone needs access to affordable utilities. They are not a luxury, but a health and safety necessity. However, not all of our families are able to pay the same amount to meet their energy needs. We appreciate the Missouri Public Service Commission's efforts to assure, "Fair Treatment For All Missouri Families".

Respectfully submitted,

 *Robin Acree* MH

 *Mary Hussmann*

Robin Acree, Executive Director and Mary Hussmann, Lead Organizer for GRO

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