

Case No. AX-2013-0091 – Proposed revisions to Chapter 13 of the Commission’s Rules

Comments of Jacqueline Hutchinson, Vice President of Operations for People’s Community Action Corporation in St. Louis Missouri:

My career has spanned for more than thirty years with Community Action Agencies in the state of Missouri. Over those years, I have been actively involved in energy policy issues and advocacy for low-income consumers on a local, state, and national level. Over these years, I have also provided testimony on behalf of low-income Missourians in the majority of rate cases impacting the St. Louis area and I have provided testimony and been a part of the negotiation in every Cold Weather Rule proceeding in Missouri.

Over the past three years, I have been a part of the Chapter 13 roundtable discussions. That group has been able to reach consensus on the majority of the provisions of chapter 13 rules; however there are factors where consensus could not be reached. These rule changes will have a greater impact elderly and low-income Missourians and could pose increased risks to health and safety for our most vulnerable populations.

I concur with all comments submitted by OPC, AARP, CCM, LSEM and the attached comments submitted by Dr. Megan Sandel, outlining the existing and potentially increases to health and safety for vulnerable populations.

Changes to the rule that are most concerning to me are those that potentially put vulnerable Missouri consumers at greater health and safety risk:

1. Moving to credit scoring to establish service and elimination of the alternative methods such as a job and rent payment, for consumer to prove credit worthiness
2. Allowing water utilities to disconnect water service for unpaid sewer bills.
3. Excessive deposits, four times the average bill
4. Change in allowable disconnect hours
5. Expansion of consumer liability in estimated bills due to equipment failure
6. Eliminating the premise visit and knock on the door before utility disconnection (I recognize and commend the commission for maintaining this requirement in its proposed rule and ask that it be this language be retained.)

I ask that you consider the conditions that exist for a large segment of our population as you move forward to finalize the changes to the Chapter 13 rules. Some of the demographic factors to consider are:

- According to the 2011 Census report, more that 14.6% of the residents of the St. Louis City and County live below the poverty line, with a statewide poverty rate of 11.7 percent in Missouri. For single mothers with dependent children, the poverty level hovers around 44 percent.


- Missouri's elderly population has increased more consistently and proportionately than any other group in the state. By 2030, persons over age 65 will represent more than one-fifth of all Missourians. This population is expected to increase 87% over 2000 levels
- The 85 and over age-group is the fastest growing population in our state. This factor alone will likely lead to increased numbers of isolated and vulnerable elderly in our state.
- Low income elderly and disabled individuals continue to make "heat or eat" decisions at an alarming rate with no improvement in site.

I would like to close by saying, the collaboration between utility companies and local agencies have been vital to identifying possible vulnerable customers and preventing health and safety risks associated with cut off. Over the years, there have been many occasions where at-risk customers have been referred to our agencies after being identified by utility worker knocking at the door.

An example of one of many cases:

Recently our staff had a case that was brought to our attention by the electric company, which involved a 46 year old disabled woman who was on an oxygen machine, and is also confined to her bed. Because of her medical equipment, her utility bills are extremely; she had past due amount exceeding \$1100 and a monthly budget that exceeded \$300. Having a knock on the door before disconnection is vital to protect the health and safety of this customer and many others like her.

Thank you for your consideration,

A handwritten signature in cursive script that reads "Jacqueline A. Hutchinson".

Jacqueline A. Hutchinson