

March 17, 2026

Missouri Public Service Commission  
Kayla Hahn, Chair  
200 Madison Street, PO Box 360  
Jefferson City, MO 6502-0360

Dear Chair Hahn and Commissioners,

Missouri Coalition for the Environment (MCE) is a nonprofit, non-partisan advocacy organization that seeks to empower Missourians to protect their environment and their health. In the matter of Docket Sheet OW-2026-0085, MCE applauds the Commission for considering action to improve Missourians' access to affordable, life saving energy through a low-income rate class. The program, if executed well, has the potential to relieve the tens of thousands of Missourians already struggling under extraordinary energy burden today.<sup>1</sup> MCE respectfully urges the Commission to wholly adopt the proposal submitted by Consumers Council of Missouri (CCM) on February 27, 2026 and additionally to consider a low-income community solar pilot program.

The proposal submitted by CCM contains three vital components, all of which MCE supports. First, it structures a low income rate around categorical eligibility. This eases the administrative burden on all parties, improving program efficiency and keeping overhead costs low. Consumers Council secondly asks the Commission to continue current affordability programs necessary to many Missourians' survival. A stakeholder workshop conducted during the rulemaking process is the third intervention CCM suggests and MCE supports. This ensures those most affected by the potential low-income rate have a real seat at the decision making table. Doing so will avoid costly reworking of programs that, without input of those most affected, may not work well from the start.

It is abundantly clear that current programming, though vital, is not sufficiently meeting Missourians' needs. These efforts should be expanded and combined with the low-income rate proposed by CCM. Missouri ranked 6th in the nation for the number of households disconnected from utility service in 2022.<sup>2</sup> A low income rate would help prevent those customers from falling into arrears. For example, Liberty Electric published a report in 2023 showing that approximately 37,000 households (32% of customers) in their service territory alone suffer from high energy burden, or spending 6% or more of their annual income on utilities.<sup>3</sup> This clearly demonstrates the need for low-income households to be provided additional assistance with paying their utility bills. Consumers Council estimates this problem will worsen if current conditions persist due to utility legislation passed last year: SB4 (2025) is expected to cost Missouri households an additional \$1,115 per year.<sup>4</sup>

---

<sup>1</sup> A full breakdown of energy burden statewide is available in the Renew Missouri Energy Burden Explorer: <https://app.power-d.city/dashboard/missouri>. In St. Louis City and County alone, over 31,000 households experience energy burden.

<sup>2</sup> Bell, Selah Goodson, et al. Powerless in the United States. Bailout Watch, Center for Biological Diversity, and the Energy and Policy Institute, 30 Jan. 2023, p. 4. [https://www.biologicaldiversity.org/programs/energy-justice/pdfs/Powerless-in-the-US\\_Report.pdf](https://www.biologicaldiversity.org/programs/energy-justice/pdfs/Powerless-in-the-US_Report.pdf).

<sup>3</sup> Shaban, Hassan. "Liberty Utilities: 2023 Missouri Energy Burden Assessment," Empower Dataworks and Liberty Utilities, p. 18, December, 2023. <https://www.efis.psc.mo.gov/Document/Display/840300>

<sup>4</sup> SB 4, Consumers Council of Missouri. n.d. Accessed March 16, 2026. <https://moconsumers.org/tag/sb-4/>.

The state's continued overreliance on fossil fuels and active interest in nuclear energy will also exacerbate today's utility crisis. As a result, MCE supports the addition of a low-income community solar pilot program. Renewable energy is the sole option for zero-pollution energy generation, and thus the only energy source capable of decreasing the significant externalized costs of fossil fuel generation already being borne by the very customers this program targets.<sup>5</sup> Additionally, utility scale solar specifically is the cheapest and fastest to deploy form of energy on the market today, even despite lost federal funding: at their lowest, the levelized cost of utility scale solar is \$38/MWh while a new gas peaking plant or new nuclear generation is \$138/MWh, meaning investing in solar produces a savings of over 70%.<sup>6</sup> However, Ameren's current "community solar" program currently charges 10% more than their peak-demand fossil-fuel-based retail electric rate, making it inaccessible to customers already struggling to pay their bills.<sup>7</sup> While the utility companies in Missouri could simply choose to pass the enormous savings of the renewable energy transition on to customers without PSC intervention, clearly, they will not. Income-qualified community solar programs have been executed successfully in twenty-three states.<sup>8</sup> MCE asks that the PSC consider joining the list by requiring all electric utilities in the state to implement a pilot program designed to provide low-income ratepayers with access to fairly priced, clean, renewable energy.

Missouri ratepayers need clean, affordable energy now more than ever. Thank you for considering a statewide low-income rate class.

Sincerely,



Elyse Dianne Schaeffer, Policy Coordinator  
Missouri Coalition for the Environment  
314-246-0178  
eschaeffer@moenvironment.org

---

<sup>5</sup> For example, the Labadie Coal Plant alone is responsible for nearly 200 deaths per year (Prull, Daniel. *Out of Control: The Deadly Impact of Coal Pollution*, Sierra Club, February 2023, pp. 10. <https://coal.sierraclub.org/sites/nat-coal/files/Out%20of%20Control%20coal%20mortality%20report%20FINAL.pdf>); St. Louis experienced the second most asthma deaths in the country in 2024 (*2024 Asthma Capitals: The Most Challenging Places to Live with Asthma*, Asthma and Allergy Foundation of America, 2024, p. 13.); and asthma cases are highly concentrated in low income neighborhoods (*Environmental Racism in St. Louis 2026*, The Interdisciplinary Environmental Clinic, Washington University School of Law, pp. 9-10, February 9, 2026.).

<sup>6</sup> *Levelized cost of Energy+*, Lazard Power, Energy, and Infrastructure Group, June 2025, pp. 8-9. <https://www.lazard.com/media/eijnqja3/lazards-lcoeplus-june-2025.pdf>

<sup>7</sup> At time of writing, Ameren's community solar rate is \$0.1732/kWh, its residential summer rate is \$0.1560/kWh, and its off peak season rate is \$0.1062. "Community Solar." Accessed March 16, 2026. <https://www.ameren.com/service/renewables/community-solar>.

MO PSC Case No. ER-2024-0319. <https://www.ameren.com/-/media/rates/missouri/residential/electric-rates/rates/uecsheet54rate1mres.ashx>

<sup>8</sup> Hausman, Nate. "How Community Solar Can Benefit Low- and Moderate-Income Customers," *World Resources Institute*, June 16, 2022. <https://www.wri.org/insights/community-solar-low-income-customers>.