

**BEFORE THE PUBLIC SERVICE COMMISSION OF THE STATE OF MISSOURI**

In the Matter of a Working Case for Commission )  
Review and Consideration of Utility Assistance ) File No. OW-2026-0085  
Programs and Special Alternative Residential )  
Customer Rates. )

**COMMENTS OF GREAT RIVERS ENVIRONMENTAL LAW CENTER  
AND SIERRA CLUB**

**I. Introduction**

Great Rivers Environmental Law Center (“the Center”) and Sierra Club (collectively, “Commenters”) submit the following comments supporting the establishment of a low-income rate class and the proposal submitted by Consumers Council of Missouri (“CCM”) on February 27, 2026.

The Center is a nonprofit environmental legal advocacy organization with over twenty years of experience representing communities across Missouri and Southern Illinois on matters of environmental law and policy. Sierra Club is a national nonprofit environmental organization with more than 28,000 members and supporters in Missouri, with a long-standing commitment to clean energy equity in the state.

Senate Bill 4 (2025) enacted Section 393.1680 RSMo, granting the Commission express authority to establish special alternative residential customer rates based in part on household utility burden. Commenters urge the Commission to exercise that authority and establish a low-income rate class, and to do so by considering the comments enclosed so as to ensure that any framework adopted is grounded in the lived experience of the low-income Missouri households it is designed to serve.

**II. Commenters Urge the Commission to Convene the Stakeholder Workshop Requested by CCM Before Advancing any Proposed Rule or Changes to Existing Programs**

Before the Commission advances any proposed rule or changes to existing programs, Commenters urge it to convene the stakeholder workshop CCM has requested. The workshop is not a procedural formality. It is essential to ensuring the rule is developed in a manner that is effective and responsive to impacted individuals and families.

Organizations that administer low income utility programs, such as community action agencies, possess firsthand knowledge of how energy burden manifests in the lives of Missouri households. They administer utility assistance programs, navigate disconnection crises, and already have established relationships with the income-qualified households this proceeding is designed to serve. Any low-income rate structure developed without their direct input risks being ill-fitted to the realities it is meant to address, and any reworking required after the fact will impose unnecessary costs and delays.

Accordingly, Commenters urge the Commission to expressly invite participation from Missouri organizations and agencies that administer low income utility programs serving every region of the state. The Commission should also invite energy-focused advocacy organizations that work

directly with low-income households on utility affordability and energy equity, including organizations such as the Urban League of Metropolitan St. Louis, Action St. Louis, Tenants Transforming Greater St. Louis, and LISC Greater Kansas City. This list is not exhaustive, and the Commission should take care to include organizations representing low-income communities in both urban and rural areas and in regions of the state beyond the St. Louis and Kansas City metro, including the Bootheel, the Ozarks, and mid-Missouri.

The lived experience of those most affected by energy burden should inform the framework from the outset, not serve as a corrective after the fact.

### **III. Commenters Support CCM’s Proposed Draft Rule as a Starting Point for Rulemaking**

Commenters fully support the proposal submitted by CCM on February 27, 2026, including the draft rule attached thereto. CCM’s proposed rule is designed as a starting point — broad enough and flexible enough to cover the different situations of each regulated Missouri utility, while setting the framework and guidelines for consideration of special alternative residential customer rates. The implementation details, including the specific rates or discounts applicable to each utility, would be worked out on a utility-by-utility basis in future general rate case proceedings. Commenters urge the Commission to adopt CCM’s proposed rule as the foundation for that framework.

The proposed rule is well-designed for exactly that reason. Its use of categorical eligibility reduces administrative burden, keeps overhead low, and ensures that qualified households can access relief without unnecessary barriers. Its call for continuation of existing affordability programs recognizes that current programs provide a lifeline that must not be disrupted during any transition to a new rate structure.

### **IV. The Data Demand Action**

This proceeding was opened as a repository for information relevant to the Commission’s consideration of utility assistance programs and special alternative residential customer rates. Commenters submit the following data and research into the record, and urge the Commission to treat it as part of the evidentiary foundation for the rulemaking that follows. Copies of the reports cited in this section are attached as exhibits to this filing and incorporated by reference.

The data already in this record, combined with independent research, paint a clear picture of energy burden across Missouri’s communities. The St. Louis Energy Burden Report documents that approximately 19,300 households in St. Louis City and 12,500 households in St. Louis County reside in high energy burden census tracts, and that predominantly Black census tracts carry more than double the energy burden of predominantly white census tracts.<sup>1</sup> That disparity has a direct health cost. Households in high energy burden census tracts experience nearly twice the rate of asthma cases per tract as those in low burden areas, and Black children in St. Louis City are ten times more likely to visit the emergency room for asthma than white children. The

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<sup>1</sup> Jenn DeRose and Tori Cheatham, St. Louis Energy Burden Report: How Geography, Income, and Race Factor into Energy Costs for St. Louis Families (Jan. 2025), published by Sierra Club and Renew Missouri in partnership with Consumers Council of Missouri. Available at [https://www.sierraclub.org/sites/default/files/2025-01/stlouisenergyburdenreportjan2025\\_0.pdf](https://www.sierraclub.org/sites/default/files/2025-01/stlouisenergyburdenreportjan2025_0.pdf). Attached hereto as Exhibit A.

Report specifically recommends establishing a low-income rate class, publishing disconnection data at the census tract level, and fully funding LIHEAP.

Energy burden is not confined to urban areas. In rural Missouri, households face a distinct but equally severe set of challenges, including higher poverty rates, older and less efficient housing stock, and limited access to energy efficiency programs. These conditions contribute to disproportionately high energy burdens in rural communities, where households may spend a significant share of their income on basic utility service. State data confirms that poverty rates are higher in rural Missouri than in urban areas, at 16.5 percent compared to 12.3 percent, compounding the impact of rising energy costs and leaving many households without meaningful access to existing assistance programs.<sup>2</sup>

The Environmental Racism in St. Louis report, published by the Interdisciplinary Environmental Clinic at Washington University School of Law, further recommends that the Commission require the collection and public release of data on energy costs and disconnections, and that the Low-Income Weatherization Assistance Program be expanded.<sup>3</sup> Commenters urge the Commission to incorporate both recommendations into any framework developed in this proceeding.

## **V. Key Components of an Effective Low-Income Rate Framework**

The data in this record not only demonstrate the need for a low-income rate class, but also identify key elements necessary to ensure that any framework adopted by the Commission is effective, equitable, and responsive to community needs.

### **A. Data Transparency and Disconnection Reporting**

Commenters note that the publication of disconnection data at the census tract or zip code level would meaningfully advance the Commission's ability to understand and address energy burden disparities across Missouri communities. Granular, geographically specific data is a foundational tool for equitable policymaking and would allow Community Action Agencies and nonprofit organizations to more effectively direct outreach and assistance to households most at risk. Commenters note that utilities can release this data voluntarily without a statewide rule, and urge the Commission to encourage them to do so.

Commenters respectfully ask the Commission to consider what data publication requirements or expectations would best support the goals of this proceeding and the communities it is designed to serve. Research also confirms that state-level energy burden averages routinely obscure significant local disparities, meaning that aggregate data can create a false impression that existing programs are meeting community needs when neighborhood-level realities tell a very different story. Missouri-specific, census tract-level data would give the Commission the precision it needs to design a low-income rate structure that actually reaches the households this

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<sup>2</sup> Missouri Office of Rural Health, Biennial Report on the Status of Rural Health in Missouri (2020), p. 12. Available at <https://health.mo.gov/living/families/ruralhealth/pdf/biennial2020.pdf>. Attached hereto as Exhibit B.

<sup>3</sup> Interdisciplinary Environmental Clinic, Washington University School of Law, Environmental Racism in St. Louis 2026 (Feb. 9, 2026). Attached hereto as Exhibit C.

proceeding is meant to serve. The Powerless in the United States report similarly recommends that all public and private utilities be required to publicly report disconnection data at least monthly, paired with data identifying which communities are impacted — a recommendation Commenters echo and urge this Commission to adopt.<sup>4</sup>

## **B. Access to Affordable Clean Energy Through Community Solar**

Access to clean, affordable energy is a necessary complement to rate relief. Commenters also support the addition of a low-income community solar pilot program.

Utility-scale solar is currently the cheapest and fastest form of energy generation available, with a levelized cost as low as \$38 per MWh compared to \$138 per MWh for a new gas peaking plant or nuclear generation. That savings potential cannot reach low-income ratepayers under current conditions: Ameren's existing community solar program charges a premium above its peak demand fossil fuel retail rate, placing it entirely out of reach for households already struggling with energy costs.

Requiring electric utilities to implement a pilot program that provides low-income ratepayers with access to fairly priced renewable energy is both practically achievable and consistent with the Commission's obligations to Missouri ratepayers. Without a state-led program, voluntary and utility-led efforts will not reach underserved communities. Similar programs have been implemented in twenty-three states<sup>5</sup>. We urge Missouri to join them.

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<sup>4</sup> Selah Goodson Bell et al., *Powerless in the United States: How Utilities Drive Shutoffs and Energy Injustice*, Bailout Watch, Center for Biological Diversity, and Energy and Policy Institute (Jan. 30, 2023), p. 4. Available at [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). Attached hereto as Exhibit D.

<sup>5</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>.

## VII. Conclusion

Missouri ratepayers need relief, and they need it now. Commenters urge the Commission to adopt the CCM proposal in full, schedule a stakeholder workshop that centers the voices of Community Action Agencies before any proposed rule is advanced, and take the additional steps outlined above to ensure that the framework developed here is equitable, evidence-based, and durable. This is a generational opportunity. Missouri families are counting on this Commission to meet it.

The sources cited herein are attached as exhibits to this filing and incorporated by reference. Commenters respectfully request that the Commission include these exhibits in the information repository for this docket.

Respectfully submitted,



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