

**In the Matter of a Working Case for
Commission Review and Consideration of
Utility Assistance Programs and Special
Alternative Residential Customer Rates.**

File No. OW-2026-0085

Content: Response to Order Requesting
Comments and Scheduling Workshop

Date of Submission: 04/28/2026



Name of Agency Community Action Partnership of Greater Saint Joseph

Mission Statement of agency: The mission of Community Action Partnership of Greater St. Joseph is to help people, change lives and engage communities to end poverty.

Vision Statement of Agency: The vision of Community Action Partnership of Greater St. Joseph is a community committed to ending poverty.

Organization: Community Action Partnership of Greater Saint Joseph
Name: Heidi Surrutt
Title: LIHEAP Manager
Date of Submission:
Provider? <input checked="" type="checkbox"/> Please complete both Part A and Part B
Stakeholder only? <input type="checkbox"/> Please complete only Part B
Programs Administered/Managed by your Organization (ALL utility related programs, including government funded programs such as LIHEAP and weatherization)
<ol style="list-style-type: none"> 1. LIHEAP 2. Dollar Help 3. Dollar More 4. Ameren Energy Relief Grant

Part A: Provider Information Request

If you or your organization helps or has previously helped administer a utility assistance program (weatherization, LIHEAP, PAYS, Keeping Current, Dollar Help, Dollar More, ERPP, Critical Needs, Low-Income Assistance Programs, Payment Partner Program, etc.) please provide your name and the name of your organization and complete Part A. **If you don't manage or administer programs, skip to Part B on page 2.**

Please complete a table for each program that your organization manages

Copy and paste the tables as needed for the number of programs your organization manages

Cells will expand as needed to accommodate text

Provide information on the time and duration of administering program (for example: Weatherization – February 1976)

Provider Question 1: PROGRAM ADMINISTRATION						
Utility Company		Program Name		State Agency Partner		
		LIHEAP		Missouri Department of Social Services		
Program Start Date	1981	Program End Date	Ongoing	Total # Employ	4	
Job Title 1	LIHEAP Program Manger	Duties	Oversight of reception and LIHEAP staff, supporting staff with complex LIHEAP guidelines, serving as primary contact for suppliers and state officials for day to day processing issues, ECIP budget tracking.	# Employ	1	
Job Title 2	LIHEAP Specialists	Duties	Processing paper and email applications, managing client case files, entering payments for pledges.	# Employ	2	
Job Title 3	LIHEAP Client Support Specialist	Duties	Answering complex client inquiries, checking application status and registering new applications, assisting with crisis pledges.	# Employ	1	
Annual Average Enrollment #	2048	Monthly Average Enrollment #	170.6			
Comments						

Provider Question 2: EVALUATION FOR EFFECTIVENESS	
Do you conduct surveys to gauge effectiveness of this utility assistance program?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
Do you conduct any non-survey evaluations to gauge effectiveness of this program?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No

Do you share the results...with utility partners? Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> ...with state agencies? <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
If you conduct surveys or other evaluations, please explain the process you use.
Quarterly State-Led Self-Monitoring: Each quarter, our agency receives a targeted list of applications from the state for review. We utilize a standardized monitoring format to audit these files for accuracy and compliance. Following this review, we meet with LIHEAP staff to analyze any findings and develop a corrective action plan to prevent future errors.
Triennial Community Needs Assessment (CNA): Every three years, our agency conducts a comprehensive Community Needs Assessment. This involves gathering data and community feedback to identify gaps in service, energy burdens, and the overall effectiveness of our utility assistance programs in meeting the needs of the residents in our counties.
Continuous Internal Audits: Beyond state requirements, we conduct regular internal file audits to ensure that the improvements made in staff performance are being maintained across all application types.

Provider Question 3: STRENGTHS AND WEAKNESSES OF ASSISTANCE PROGRAMS
Based on experience and participant feedback, what are the STRENGTHS of this program?
The CNA and Community outreach allow us to create or strength our programs and processes based on the feedback we get from the people who use our services.
Based on experience and participant feedback, what are the WEAKNESSES of this program?
The changes in the LIHEAP guidelines (specifically shifting from Covid to now) can be difficult for the community to understand. It takes years for people to get used to changes so making everything uniform across the state and keeping those guidelines in place with minimal changes would be extremely beneficial for the community in the long run. The community could know they could count on us if they are in crisis.
If you have it, please provide empirical and/or anecdotal data that supports your comments.

Provider Question 1: PROGRAM ADMINISTRATION					
Utility Company		Program Name		State Agency Partner	
Spire		Dollar Help			
Program Start Date	1982	Program End Date	Ongoing	Total # Employ	4
Job Title 1	LIHEAP Program Manger	Duties	Oversight of fund distribution, Requesting allocations of additional funds. Updating staff on changes to the program and fund balances.	# Employ	1
Job Title 2	LIHEAP Specialists	Duties	Identifying eligible households during the standard LIHEAP application process, verifying gas utility account status, and processing the supplemental "Dollar Help" pledges.	# Employ	2
Job Title 3	LIHEAP Client Support Specialist	Duties	Identifying eligible crisis households verifying gas utility account status and placing the Dollar Help pledges on the client's account.	# Employ	1
Annual Average Enrollment #	81	Monthly Average Enrollment #	6.75		
Comments	Enrollment numbers are based of Fiscal Year 2025				
Provider Question 2: EVALUATION FOR EFFECTIVENESS					
Do you conduct surveys to gauge effectiveness of this utility assistance program?			<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No		
Do you conduct any non-survey evaluations to gauge effectiveness of this program?			<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No		
Do you share the results...with utility partners? Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>			...with state agencies? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No		
If you conduct surveys or other evaluations, please explain the process you use.					
We do not conduct formal surveys or outreach for this program. Instead, our effectiveness is measured by our ability to restore service for households that have already been disconnected. We report these numbers monthly to the board.					
Provider Question 3: STRENGTHS AND WEAKNESSES OF ASSISTANCE PROGRAMS					
Based on experience and participant feedback, what are the STRENGTHS of this program?					
The primary strength of this program is that it provides a vital funding stream that exists even after federal and state emergency funds (ECIP) are exhausted. Having these funds available allows us to help families who would otherwise have no other options for restoring their utility service.					
Based on experience and participant feedback, what are the WEAKNESSES of this program?					
Because the funding pool is limited and depletes quickly, we have to restrict usage to households whose service is already off. This means we cannot use these funds for households with a "disconnect notice" to prevent the shut-off from happening in the first place, which is a difficult but necessary limitation to ensure the funds reach those in the absolute worst-case scenarios.					
If you have it, please provide empirical and/or anecdotal data that supports your comments.					

Provider Question 1: PROGRAM ADMINISTRATION					
Utility Company		Program Name		State Agency Partner	
Ameren		Dollar More			
Program Start Date	1982	Program End Date	Ongoing	Total # Employ	4
Job Title 1	LIHEAP Program Manger	Duties	Oversight of fund distribution, Requesting allocations of additional funds. Updating staff on changes to the program and fund balances.	# Employ	1
Job Title 2	LIHEAP Specialists	Duties	Identifying eligible Ameren customers during the standard LIHEAP processing and making Dollar More pledges for those who have exhausted their state crisis benefits.	# Employ	2
Job Title 3	LIHEAP Client Support Specialist	Duties	Identifying eligible crisis households verifying Ameren account status and placing the Dollar More pledges on the client's account.	# Employ	1
Annual Average Enrollment #		6	Monthly Average Enrollment #	0.5	
Comments	Enrollment numbers are based on Fiscal year 2025				
Provider Question 2: EVALUATION FOR EFFECTIVENESS					
Do you conduct surveys to gauge effectiveness of this utility assistance program?			<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No		
Do you conduct any non-survey evaluations to gauge effectiveness of this program?			<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No		
Do you share the results...with utility partners? Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> ...with state agencies?			<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No		
If you conduct surveys or other evaluations, please explain the process you use.					
Since we do not conduct formal outreach or surveys for this program, effectiveness is measured by our ability to resolve a client's crisis after state ECIP funding is depleted. We monitor the success of these funds by verifying that pledges effectively stop a pending disconnect or successfully restore service for terminated accounts. These numbers are reported monthly to the board.					
Provider Question 3: STRENGTHS AND WEAKNESSES OF ASSISTANCE PROGRAMS					
Based on experience and participant feedback, what are the STRENGTHS of this program?					
he primary strength of Dollar More is the availability of additional funding for Ameren clients who have hit their federal crisis maximum. Unlike some other supplemental funds, we are able to utilize these for anyone with a disconnect notice or a terminated service, allowing for more proactive intervention before the power is actually shut off.					
Based on experience and participant feedback, what are the WEAKNESSES of this program?					
The biggest weakness of this program for our specific agency is that we do not have a high concentration of Ameren customers across the four counties we serve. This means the funds are only accessible to a small segment of our service population compared to other utility providers.					
If you have it, please provide empirical and/or anecdotal data that supports your comments.					

Provider Question 1: PROGRAM ADMINISTRATION					
Utility Company		Program Name		State Agency Partner	
Ameren		Energy Relief Grant			
Program Start Date	2022	Program End Date	Ongoing	Total # Employ	4
Job Title 1	LIHEAP Program Manger	Duties	Oversight of program rollout and funding, managing the specific \$150 flat-rate pledge process,	# Employ	1
Job Title 2	LIHEAP Specialists	Duties	Screening Ameren accounts for the specific \$150 balance requirement and processing payments for active accounts that meet the grant criteria.	# Employ	2
Job Title 3	LIHEAP Client Support Specialist	Duties	Screening Ameren accounts for the specific \$150 balance requirement and processing payments for active accounts that meet the grant criteria.	# Employ	1
Annual Average Enrollment #	9	Monthly Average Enrollment #	0.75		
Comments	Enrollment numbers are based on Fiscal year 2025				

Provider Question 2: EVALUATION FOR EFFECTIVENESS	
Do you conduct surveys to gauge effectiveness of this utility assistance program?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
Do you conduct any non-survey evaluations to gauge effectiveness of this program?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
Do you share the results...with utility partners? Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> ...with state agencies?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
If you conduct surveys or other evaluations, please explain the process you use.	
We do not conduct formal surveys for this program however we are including it in our outreach efforts next month in the service area where there is a higher population of Ameren customers. We monitor the success of the program by ensuring the flat-rate \$150 payment is applied correctly to active accounts with the required minimum balance.	

Provider Question 3: STRENGTHS AND WEAKNESSES OF ASSISTANCE PROGRAMS	
Based on experience and participant feedback, what are the STRENGTHS of this program?	
The greatest strength of this program is that it does not require a disconnect notice or the exhaustion of ECIP funds. This allows us to provide proactive assistance to households before they enter a crisis state. The flat \$150 payment provides clear, predictable relief for active accounts that may not typically qualify for emergency programs but still carry a significant energy burden.	
Based on experience and participant feedback, what are the WEAKNESSES of this program?	
The requirement for an active account to have a balance of at least \$150 can be a barrier for some lower-income households who work hard to keep their balance low but still need financial support. As with other Ameren-specific programs, the small number of Ameren customers in our four-county service area makes it difficult to maximize the impact of the grant locally.	
If you have it, please provide empirical and/or anecdotal data that supports your comments.	
This program has been particularly helpful for "working poor" households who stay current on their bills but struggle to reduce their overall debt; it provides a rare opportunity for assistance without requiring a "shut-off" status.	

Part B: Stakeholder Information Request

All interested stakeholders are invited to submit responses to **any or all of the following questions**. To ensure submissions are as helpful as possible, respondents are encouraged to provide specific information and data relevant to circumstances experienced in Missouri, "lessons learned" from other jurisdictions, and citations.

Stakeholder Question 1: EFFECTIVENESS OF EXISTING PROGRAMS AT REDUCING ARREARAGES AND DISCONNECTIONS FOR HIGH-BURDEN HOUSEHOLDS	
a. How much do existing programs help improve long-term household stability versus one-time crisis relief (i.e. reduce repeat disconnects)?	Existing programs primarily provide one-time crisis relief rather than long-term stability. While assistance prevents immediate disconnection, the underlying energy burden remains, leading many households to return for crisis assistance annually.
b. Which specific features are most effective at stabilizing households and preventing repeated cycles of arrearage (e.g., predictable monthly payments, income-based caps, arrearage forgiveness, and hardship protections, etc.)?	Programs that allow for assistance without requiring a "service off" status are far more effective. If more programs offered assistance to the "working poor" before they hit a crisis, we would be incentivizing people to keep their bills caught up rather than effectively telling them to stop paying in order to qualify for help.
c. What customer categories (e.g., irregular income, medical debt, unbanked, etc.) are currently underserved or excluded by existing programs?	The "working poor" are often excluded because most programs require a disconnect notice to trigger funding. When these households are forced to get behind to get help, they enter a "never-ending cycle" of high payment plans with energy suppliers that they cannot sustain.
d. What aspects of existing programs limit or reduce effectiveness (e.g., funding caps, restrictive eligibility windows, administrative barriers, etc.)?	The lack of competition in utility markets means customers are "stuck" with their provider and have no option to shop for better rates . When they cannot meet basic human needs and have no alternatives, they often resort to putting bills in other people's names. This leads to a messy web of multiple people's past-due debts, which ultimately makes their financial situation much worse.
e. What specific modifications or alternative models (e.g., income-based caps or automatic enrollment) could close identified gaps?	Modifications should include "Pre-Crisis" grants and categorical enrollment. Closing the gap requires moving away from a model that waits for a shut-off to occur and moving toward a model that supports consistent payment habits.

Stakeholder Question 2: CRITERIA AND MECHANISMS FOR PROGRAM ENROLLMENT	
a. What principles should be used to establish eligibility criteria (e.g., need, administrative feasibility, accuracy, and alignment with household need) and how should programs prioritize access to assistance when resources are limited?	
b. What income thresholds, vulnerability indicators, or energy burden metrics to determine program eligibility?	
c. Would automatic or categorical enrollment be effective?	Yes, this would be highly effective. If a client is already verified through SNAP or LIHEAP, they should be automatically eligible for supplemental grants like Dollar Help or Dollar More. This saves the client from having to prove their poverty multiple times to different portals.
d. What risk-management practices (e.g., random audits, post-enrollment verification, data-matching) should be used that are effective without creating undue burdens for applicants?	

We should move back to allowing the use of SSA/SSI Award Letters or, ideally, grant agencies access to real-time benefit verification. Currently, telling elderly clients that their official award letters are not acceptable creates a massive burden. Real-time data-matching would provide 100% accuracy without requiring the client to track down new paperwork
e. What program design elements can be included that prevent fraud, collecting duplicate benefits, or mismanagement while maintaining accessibility for eligible households?
Using data-matching between the State, the MIS system, and Utility portals is the most effective way to prevent duplicate benefits while maintaining accessibility. Random audits are a more efficient risk-management tool than requiring 100% manual, high-barrier verification for every single supplemental grant.

Stakeholder Question 3: CHALLENGES OF ADMINISTRATIVE BURDEN
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a. What administrative practices would reduce customer burden and streamline application, verification, and recertification processes (e.g., short-form applications, online portals, single-point-of-entry systems)?
A major burden is the lack of integration between payment and tracking systems. Currently, our agency must enter the same client data into multiple platforms: the State EA system, the MIS system, the utility supplier portals, and the United Way portal (for supplemental funds). Creating a "bridge" or an integrated API between these systems would drastically reduce data entry time and minimize the risk of entry errors.
b. What program design elements would reduce administrative workload while maintaining accurate eligibility determinations?
Granting agencies real-time access to benefit information for SSA or SSI would be transformative. Currently, we are restricted from using traditional award letters for verification, which is difficult to explain to elderly clients and creates significant delays as they struggle to obtain alternative documentation. Real-time access would eliminate this hurdle.
c. What strategies from other jurisdictions that have effectively reduced verification or recertification barriers?
We should implement multi-year certifications (e.g., every 3 years) for elderly or disabled individuals on fixed incomes. Since their financial situation rarely changes year-to-year, re-processing their full application every season is an inefficient use of staff time that could be better spent on complex crisis cases.

Stakeholder Question 4: METRICS AND EVALUATION

a. What metrics should be used to evaluate program performance, measure impacts, and assess cost-effectiveness?
We should measure the reduction in total household arrearages after assistance is applied. Success should not just be "preventing a shut-off" today, but whether the household is left with a manageable balance that they can actually maintain moving forward.
b. What metrics should be used to evaluate the effectiveness of marketing, education, and outreach efforts?
We should track the staff time required to manage a single application across the State EA system, MIS, and the United Way portal. High administrative costs often stem from redundant data entry across unlinked platforms.
c. What customer-experience metrics should be used to evaluate program accessibility, clarity, and ease of navigation, including the application, verification, and enrollment processes?
A successful program should require a client to provide income documentation only once. We should also track "Status Transparency," measuring how easily a client can check their application's progress without needing to call the agency.
d. What metrics should be used to evaluate whether verification requirements are appropriately calibrated to risk?
We should track how many applications from elderly or disabled residents are delayed specifically because of the current SSA/SSI verification requirements. This metric would show if the verification barrier is too high for the vulnerable population it aims to serve.

e. What metrics should be used to assess whether programs improve long-term household stability, reduce arrearages, prevent disconnections, and support energy-efficiency or weatherization investments?

Track the rate of repeat crisis requests. If a household requires emergency assistance every single year, it is a metric that the one-time grant is not addressing the underlying energy burden or providing long-term stability.

Stakeholder Question 5: RATE STRUCTURES AND ASSISTANCE SUCCESS

a. Is there a relationship between utility rate structures and the success of assistance programs? If so, what is that relationship?

High fixed monthly charges act as a barrier to self-sufficiency. Even when a client conserves energy, the fixed portion of the bill remains the same. This punishes responsible consumption and makes it impossible for ALICE households to "save" their way out of a high balance.

B31. How does the rate design element of **fixed charges** affect households with limited or no income flexibility?

Volumetric spikes during extreme Missouri weather disproportionately affect clients in inefficient housing. A single month's high usage can exceed an entire LIHEAP grant, leaving the household in immediate crisis despite receiving state aid.

b2. How does the rate design element of **seasonal usage and rates** affect households with limited or no income flexibility?

Our agency's firm stance is that reduced rate structures must complement, not replace, assistance programs. Reduced rates act as "preventative care" by making the monthly energy burden more sustainable, but they do not eliminate the need for crisis programs when emergencies occur.

b3. How does the rate design element of **time-variant pricing** affect households with limited or no income flexibility?

Because clients cannot "shop around" for better utility rates, they are stuck with the provider's structure. Without the combination of fair rates and supplemental assistance, families are often driven to desperate measures, such as identity-swapping on accounts, just to maintain basic human needs.

Stakeholder Question 6: EFFECTIVENESS AND REDUCING RELIANCE ON CRISIS ASSISTANCE

Identify specific program elements that have demonstrated the greatest success in reducing reliance on "in crisis" assistance. (e.g., offering 1/12th debt forgiveness in exchange for on-time payments, offering leveled billing)

We advocate for a dual-track system where reduced rates and direct assistance programs work together; reduced rates act as 'preventative care' to make monthly bills sustainable for the working poor, while robust assistance programs remain the essential 'emergency safety net' that prevents families from falling into a never-ending cycle of debt and crisis

Stakeholder Question 7: IMPLEMENTATION CHALLENGES

Describe the implementation challenges that should be anticipated when launching new assistance programs.

To move Missouri from a reactive crisis model to a proactive stability model, we must maintain a dual-track system where reduced rates make monthly bills sustainable for the working poor, while robust assistance programs are preserved as the essential emergency safety net that prevents long-term debt and instability.