

**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: April 24, 2026



Jefferson Franklin Community Action Corporation

Mission Statement of agency: The mission of Jefferson Franklin Community Action Corporation is to serve individuals and families, especially those living in poverty, through partnerships, empowerment and education in order to strengthen and improve the entire community.

Vision Statement of Agency: JFCAC envisions communities with increased opportunities and an improved quality of life for families living in the crisis of poverty.

Organization: Jefferson Franklin Community Action Corporation	
Name: Cathy Poole	David Rose
Title: Community Services Director	Weatherization Director
Date of Submission:	
Provider? <input checked="" type="checkbox"/> Please complete both Part A and Part B	
Stakeholder only? <input checked="" 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 Utility Assistance 2. Ameren Keeping Current 3. Ameren Dollar More 4. Spire Dollar Help 5. Low Income Weatherization Assistance Program/DOE and BIL Funding 6. LIHEAP Weatherization Program 7. Ameren Special Weatherization Funds 8. Income Eligible Weatherization Assistance Program 9. Weatherization and Repair Program 	

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 Utility Assistance		MO Dept of Social Services	
Program Start Date	Mid 1970s	Program End Date		Total # Employ	8
Job Title 1	UA Coordinator	Duties	Manager day-to-day operations, processing and reporting.	# Employ	1
Job Title 2	UA Processor	Duties	Processing utility assistance applications	# Employ	5
Job Title 3	Program Assistant	Duties	Assisting clients at front desk and window, registering and uploading UA applications and documents	# Employ	2
Annual Average Enrollment #	4,500	Monthly Average Enrollment #	375		
Comments	The monthly average enrollment shows a 12-month average, but the enrollments are typically much higher 10/1-5/31 each year and lower during 6/1-9/31.				

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 type="checkbox"/> ...with state agencies? <input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/>
If you conduct surveys or other evaluations, please explain the process you use.

Provider Question 3: STRENGTHS AND WEAKNESSES OF ASSISTANCE PROGRAMS
Based on experience and participant feedback, what are the STRENGTHS of this program?
This program is essential to low-income households to provide heating and cooling assistance, without it, many would not have utility services, or pass away from heat or freezing temperatures. Many families obtain better financial security through the services they receive whether it is for keeping their utilities, obtaining utility services or reducing the energy cost burdens through weatherization services. Having working utility services, ensures safe living conditions for individuals and families, especially the most vulnerable such as the elderly and disabled.
Based on experience and participant feedback, what are the WEAKNESSES of this program?
The application process is complex and time consuming. Clients do not understand the requirements of providing proper documentation for income, household members, disability, age etc. The state of Missouri does not make it easier to prove income for elderly and disabled. Clients are required to provide Social Security and Social Security Disability award letters, as well as a full bank statement that shows the deposit of the benefit amount. The award letter should suffice. This requirement is putting extra burden on the elderly and disabled, especially those who are unbanked and receive benefits on pay cards instead of bank accounts. Funding is limited and may not cover the full amount needed, leaving gaps that families must still pay on their own with limited resources. Funding limitations restrict the number of households served. Administrative funds are very limited, which limits the number of staff to operate the program and can cause backlogs of applications.
If you have it, please provide empirical and/or anecdotal data that support your comments.

Provider Question 1: PROGRAM ADMINISTRATION					
Utility Company		Program Name		State Agency Partner	
		Keeping Current		Ameren	
Program Start Date	2018	Program End Date		Total # Employ	8
Job Title 1	UA Coordinator	Duties	Manager day-to-day operations, processing and reporting.	# Employ	1
Job Title 2	UA Processor	Duties	Processing utility assistance applications	# Employ	5
Job Title 3	Program Assistant	Duties	Assisting clients at front desk and window, registering and uploading UA applications and documents	# Employ	2
Annual Average Enrollment #	25	Monthly Average Enrollment #			2
Comments					

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.

Provider Question 3: STRENGTHS AND WEAKNESSES OF ASSISTANCE PROGRAMS

Based on experience and participant feedback, what are the STRENGTHS of this program?
This is a great program for those who do not like to get to a point of receiving a disconnect notice but also need a bit of extra help each month to maintain a current account balance. It is also a good program for those who need to pay off a back balance while working to keep their account current.
Based on experience and participant feedback, what are the WEAKNESSES of this program?
The limited funding restricts how many individuals can enroll in the program. It is not a good program for those who are just trying to avoid disconnection and do not keep up with the monthly payments.
If you have it, please provide empirical and/or anecdotal data that support your comments.

Provider Question 1: PROGRAM ADMINISTRATION					
Utility Company		Program Name		State Agency Partner	
		Dollar More		Ameren Missouri	
Program Start Date		Program End Date		Total # Employ	8
Job Title 1	UA Coordinator	Duties	Manager day-to-day operations, processing and reporting.	# Employ	1
Job Title 2	UA Processor	Duties	Processing utility assistance applications	# Employ	5
Job Title 3	Program Assistant	Duties	Assisting clients at front desk and window, registering and uploading UA applications and documents	# Employ	2
Annual Average Enrollment #	200	Monthly Average Enrollment #	16		
Comments	Number of enrollments per year varies quite a bit depending on funding availability.				

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.	

Provider Question 3: STRENGTHS AND WEAKNESSES OF ASSISTANCE PROGRAMS
Based on experience and participant feedback, what are the STRENGTHS of this program?
This is a private donation type of fund through Ameren. Ameren customers pay an extra dollar on their monthly bill that is then utilized by local agencies to assist participants who need more than the LIHEAP UA assistance provides each year. The funding is used after all other funds have been exhausted for the year.
Based on experience and participant feedback, what are the WEAKNESSES of this program?
Funding is extremely limited. Many community partners receive Dollar More funds to assist participants; however, because these funds are finite, they are often exhausted by other agencies. This creates challenges when a LIHEAP application has already been processed, and additional assistance is needed to resolve a household’s energy crisis. In cases where the household is required to pay a portion of their bill before LIHEAP pledges can be made, participants often use the Dollar More funds that were anticipated to supplement the LIHEAP assistance. When the participant later notifies the LIHEAP processor that their portion has been paid, it is discovered that the Dollar More funds have already been utilized. As a result, the household is required to pay an additional amount before LIHEAP funds can be pledged, since the LIHEAP agency had counted the Dollar More funds as part of the expected total assistance.
If you have it, please provide empirical and/or anecdotal data that support your comments.

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Provider Question 1: PROGRAM ADMINISTRATION					
Utility Company		Program Name		State Agency Partner	
		Dollar Help		Spire Gas	
Program Start Date		Program End Date		Total # Employ	8
Job Title 1	UA Coordinator	Duties	Manager day-to-day operations, processing and reporting.	# Employ	1
Job Title 2	UA Processor	Duties	Processing utility assistance applications	# Employ	5
Job Title 3	Program Assistant	Duties	Assisting clients at front desk and window, registering and uploading UA applications and documents	# Employ	2
Annual Average Enrollment #		27	Monthly Average Enrollment #		2
Comments	Number of enrollments per year varies quite a bit depending on funding availability.				

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.	

Provider Question 3: STRENGTHS AND WEAKNESSES OF ASSISTANCE PROGRAMS
Based on experience and participant feedback, what are the STRENGTHS of this program?
This is a private donation type of fund through Spire Gas. Spire customers pay an extra dollar on their monthly bill that is then utilized by local agencies to assist participants who need more than the LIHEAP UA assistance provides each year. The funding is used after all other funds have been exhausted for the year.
Based on experience and participant feedback, what are the WEAKNESSES of this program?
Funding is extremely limited. Many community partners receive Dollar Help funds to assist participants; however, because these funds are finite, they are often exhausted by other agencies. This creates challenges when a LIHEAP application has already been processed, and additional assistance is needed to resolve a household's energy crisis. In cases where the household is required to pay a portion of their bill before LIHEAP pledges can be made, participants often use the Dollar Help funds that were anticipated to supplement the LIHEAP assistance. When the participant later notifies the LIHEAP processor that their portion has been paid, it is discovered that the Dollar Help funds have already been utilized. As a result, the household is required to pay an additional amount before LIHEAP funds can be pledged, since the LIHEAP agency had counted the Dollar Help funds as part of the expected total assistance.
If you have it, please provide empirical and/or anecdotal data that support your comments.

Provider Question 1: PROGRAM ADMINISTRATION		
Utility Company	Program Name	State Agency Partner
	Low Income Weatherization Assistance Program/DOE and BIL funding	Department of Natural Resources Department of Energy

Program Start Date	Feb, 1976	Program End Date	NA	Total # Employ	3
Job Title 1	Coordinator	Duties	Manage day-to-day operations and paperwork.	# Employ	1
Job Title 2	Auditor	Duties	Initial inspection of homes and determination of scope of work.	# Employ	1
Job Title 3	Quality Control	Duties	Final inspection of homes to ensure compliance with all regulations.	# Employ	1
Annual Average Enrollment #	60	Monthly Average Enrollment #	4		
Comments	Annual are applicants. Monthly are completed homes.				
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.					
The Quality Control Inspection is an evaluation of the work requested, and the level of quality achieved. It includes testing which mirrors testing done during the initial inspection to gauge success. These results are shared with the funder. Our quality assurance department surveys clients for overall satisfaction. These results are shared in-house and publicly but not specifically with funders.					
Provider Question 3: STRENGTHS AND WEAKNESSES OF ASSISTANCE PROGRAMS					
Based on experience and participant feedback, what are the STRENGTHS of this program?					
The high level of training in the industry. Years of experience industry wide. Looks to achieve a return on investment. The investment is long term for the residence.					
Based on experience and participant feedback, what are the WEAKNESSES of this program?					
A lack of clear understanding as to the purpose of the program. Applicants all want windows and windows are not a quality return on investment item from our standpoint.					
If you have it, please provide empirical and/or anecdotal data that support your comments.					

Provider Question 1: PROGRAM ADMINISTRATION					
Utility Company		Program Name		State Agency Partner	
		Low Income Weatherization Assistance Program/LiHEAP funding		Department of Natural Resources Department of Energy	
Program Start Date	NA	Program End Date	Yearly	Total # Employ	3
Job Title 1	Coordinator	Duties	Manage day-to-day operations and paperwork.	# Employ	1
Job Title 2	Auditor	Duties	Initial inspection of homes and determination of scope of work.	# Employ	1
Job Title 3	Quality Control	Duties	Final inspection of homes to ensure compliance with all regulations.	# Employ	1
Annual Average Enrollment #	60	Monthly Average Enrollment #	4		
Comments	Annual are applicants. Monthly are completed homes.				
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.					
The Quality Control Inspection is an evaluation of the work requested, and the level of quality achieved. It includes testing which mirrors testing done during the initial inspection to gauge success. These results					

are shared with the funder. Our quality assurance department surveys clients for overall satisfaction. These results are shared in-house and publicly but not specifically with funders.

Provider Question 3: STRENGTHS AND WEAKNESSES OF ASSISTANCE PROGRAMS

Based on experience and participant feedback, what are the **STRENGTHS** of this program?
 The high level of training in the industry. Years of experience industry wide. Looks to achieve a return on investment. The investment is long term for the residence.

Based on experience and participant feedback, what are the **WEAKNESSES** of this program?
 A lack of clear understanding as to the purpose of the program. Applicants all want windows and windows are not a quality return on investment item from our standpoint.

If you have it, please provide empirical and/or anecdotal data that support your comments.

Provider Question 1: PROGRAM ADMINISTRATION

Utility Company		Program Name		State Agency Partner	
Ameren		Ameren Special Weatherization Funds		NA	
Program Start Date	1/1/26	Program End Date	12/31/28	Total # Employ	3
Job Title 1	Coordinator	Duties	Manage day-to-day operations and paperwork.	# Employ	1
Job Title 2	Auditor	Duties	Initial inspection of homes and determination of scope of work.	# Employ	1
Job Title 3	Quality Control	Duties	Final inspection of homes to ensure compliance with all regulations.	# Employ	1
Annual Average Enrollment #	60	Monthly Average Enrollment #	4		
Comments	Annual are applicants. Monthly are completed homes.				

Provider Question 2: EVALUATION FOR EFFECTIVENESS

Do you conduct surveys to gauge effectiveness of this utility assistance program? Yes No

Do you conduct any non-survey evaluations to gauge effectiveness of this program? Yes No

Do you share the results...with utility partners? Yes No ...with state agencies? Yes No

If you conduct surveys or other evaluations, please explain the process you use.
 Our quality assurance department surveys clients for overall satisfaction. These results are shared in-house and publicly but not specifically with funders.

Provider Question 3: STRENGTHS AND WEAKNESSES OF ASSISTANCE PROGRAMS

Based on experience and participant feedback, what are the **STRENGTHS** of this program?
 Ameren's generous threshold of \$8,000 before work must be approved. The ability to spend funds within and out of MoWAP specific clients. The ability to blend funds with DOE/LiHEAP/BIL in MoWAP.

Based on experience and participant feedback, what are the **WEAKNESSES** of this program?
 Limited lifespan.

If you have it, please provide empirical and/or anecdotal data that support your comments.

Provider Question 1: PROGRAM ADMINISTRATION

Utility Company		Program Name		State Agency Partner	
Ameren		Income Eligible Weatherization Assistance Program		NA	
Program Start Date	9/1/25	Program End Date	8/30/26	Total # Employ	3
Job Title 1	Coordinator	Duties	Manage day-to-day operations and paperwork.	# Employ	1
Job Title 2	Auditor	Duties	Initial inspection of homes and determination of scope of work.	# Employ	1

Job Title 3	Quality Control	Duties	Final inspection of homes to ensure compliance with all regulations.	# Employ	1
Annual Average Enrollment #	60	Monthly Average Enrollment #	1		
Comments	Annual are applicants. Monthly are completed homes.				
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 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.					
Our quality assurance department surveys clients for overall satisfaction. These results are shared in-house and publicly but not specifically with funders.					
Provider Question 3: STRENGTHS AND WEAKNESSES OF ASSISTANCE PROGRAMS					
Based on experience and participant feedback, what are the STRENGTHS of this program?					
Availability of carrying over funds from year to year. The ability to spend funds within and out of MoWAP specific clients. The ability to blend funds with DOE/LiHEAP/BIL in MoWAP.					
Based on experience and participant feedback, what are the WEAKNESSES of this program?					
All work above \$1,000.00 requires permission.					
If you have it, please provide empirical and/or anecdotal data that support your comments.					

Provider Question 1: PROGRAM ADMINISTRATION					
Utility Company		Program Name		State Agency Partner	
Ameren		Keeping Current Weatherization Program		NA	
Program Start Date	8/1/25	Program End Date	7/30/26	Total # Employ	3
Job Title 1	Coordinator	Duties	Manage day-to-day operations and paperwork.	# Employ	1
Job Title 2	Auditor	Duties	Initial inspection of homes and determination of scope of work.	# Employ	1
Job Title 3	Quality Control	Duties	Final inspection of homes to ensure compliance with all regulations.	# Employ	1
Annual Average Enrollment #	12	Monthly Average Enrollment #	1		
Comments	Annual are applicants. Monthly are completed homes.				
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 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.					
Our quality assurance department surveys clients for overall satisfaction. These results are shared in-house and publicly but not specifically with funders.					
Provider Question 3: STRENGTHS AND WEAKNESSES OF ASSISTANCE PROGRAMS					
Based on experience and participant feedback, what are the STRENGTHS of this program?					
Availability of carrying over funds from year to year. The ability to spend funds within and out of MoWAP specific clients. The ability to blend funds with DOE/LiHEAP/BIL in MoWAP.					
Based on experience and participant feedback, what are the WEAKNESSES of this program?					
For eligibility clients MUST sign up for Keeping Current. This severely limits who qualifies and drags other departments in the agency into the process.					
If you have it, please provide empirical and/or anecdotal data that support your comments.					

Provider Question 1: PROGRAM ADMINISTRATION						
Utility Company		Program Name		State Agency Partner		
Spire		Weatherization and Repair Program		NA		
Program Start Date	10/1/25	Program End Date	9/30/26	Total # Employ	3	
Job Title 1	Coordinator	Duties	Manage day-to-day operations and paperwork.	# Employ	1	
Job Title 2	Auditor	Duties	Initial inspection of homes and determination of scope of work.	# Employ	1	
Job Title 3	Quality Control	Duties	Final inspection of homes to ensure compliance with all regulations.	# Employ	1	
Annual Average Enrollment #	12		Monthly Average Enrollment #	1		
Comments	Annual are applicants. Monthly are completed homes.					
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 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.						
Our quality assurance department surveys clients for overall satisfaction. These results are shared in-house and publicly but not specifically with funders.						
Provider Question 3: STRENGTHS AND WEAKNESSES OF ASSISTANCE PROGRAMS						
Based on experience and participant feedback, what are the STRENGTHS of this program?						
The ability to spend funds within and out of MoWAP specific clients. The ability to blend funds with DOE/LiHEAP/BIL in MoWAP.						
Based on experience and participant feedback, what are the WEAKNESSES of this program?						
Limited client base in our area.						
If you have it, please provide empirical and/or anecdotal data that support your comments.						

Provider Question 1: PROGRAM ADMINISTRATION						
Utility Company		Program Name		State Agency Partner		
Spire		Weatherization Readiness		NA		
Program Start Date	10/1/25	Program End Date	9/30/26	Total # Employ	3	
Job Title 1	Coordinator	Duties	Manage day-to-day operations and paperwork.	# Employ	1	
Job Title 2	Auditor	Duties	Initial inspection of homes and determination of scope of work.	# Employ	1	
Job Title 3	Quality Control	Duties	Final inspection of homes to ensure compliance with all regulations.	# Employ	1	
Annual Average Enrollment #	12		Monthly Average Enrollment #	1		
Comments	Annual are applicants. Monthly are completed homes.					
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 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.						
Our quality assurance department surveys clients for overall satisfaction. These results are shared in-house and publicly but not specifically with funders.						
Provider Question 3: STRENGTHS AND WEAKNESSES OF ASSISTANCE PROGRAMS						
Based on experience and participant feedback, what are the STRENGTHS of this program?						

The ability to spend funds on clients whose homes are denied initial weatherization.
Based on experience and participant feedback, what are the WEAKNESSES of this program?
Limited client base in our area. Homes that receive readiness funds MUST result in a weatherized home.
If you have it, please provide empirical and/or anecdotal data that support your comments.
If a home is deferred from weatherization due to a repair or repairs outside of the scope of weatherization, like a roof replacement, readiness may take care of the costs. However, if the home still can't be weatherized after the Spire repair, the home is not eligible for those Spire funds. The agency becomes liable.

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)?
Weatherization programs invest in physical, tangible improvements to property utilized by the occupant. The improvements stay with the home and are long-term benefits designed to last years and benefit any occupant of the home, not just the immediate residents. Each improvement, other than health and safety items, is designed and expected to provide a return on the investment which the occupant benefits from for the useful life of the item.
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.)?
Reduced utility costs from reduced usage and increased comfort contribute directly to the available income clients have, to pay bills. This is a long term and recurring benefit most of which is passive and requires little effort to realize by the resident.
c. What customer categories (e.g., irregular income, medical debt, unbanked, etc.) are currently underserved or excluded by existing programs?
Irregular income and unbanked are probably the most underserved in Missouri. They struggle to provide the required income documentation, especially the elderly and disabled unbanked. They find it very hard to provide the required bank statement showing their deposit amount(s) when they use a pay card to receive benefits.
d. What aspects of existing programs limit or reduce effectiveness (e.g., funding caps, restrictive eligibility windows, administrative barriers, etc.)?
For utility assistance, administrative funding is a very large barrier. There is very little administrative funds provided to agencies to administer the LIHEAP Utility Assistance Program. More administrative funding is needed In order to hire the number of processors needed to ensure timely processing of applications. Housing stock. The ability to repair and invest in homes which are not a good investment on their own, reduces available funding for a sturdier stock home. The inability to use common sense in finding alternative solutions to housing stock issues. The \$10,000.00 dollars we invest in a home valued at \$2,000.00 may better be used for paying rent or finding an alternative residence for the client.
e. What specific modifications or alternative models (e.g., income-based caps or automatic enrollment) could close identified gaps?
For utility assistance, automatic enrollment for elderly and disabled should occur on a three-year rotation. Their incomes do not increase much each year with the small COLAs received from Social Security. If they only had to recertify once every three years, the burden of processing applications in a timely manner would decrease and providing quick emergency assistance would increase. Housing value should be considered before investment, and alternatives should be available for clients which we would either walk away from or invest massively in when home value doesn't cover the cost.

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?	Programs should start with parts of the community without the ability or opportunity to better their situation on their own. Elderly, disabled, and children.
b. What income thresholds, vulnerability indicators, or energy burden metrics to determine program eligibility?	Elderly (fixed income), disabled, and children.
c. Would automatic or categorical enrollment be effective?	Weatherization has that and the effect is limited. Utility assistance does not have that benefit, but we believe it would be very effective to allow elderly and disabled to only enroll and certify their income once every three years.
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?	LIHEAP Utility assistance already utilizes random case audits and post-enrollment verification.
e. What program design elements can be included that prevent fraud, collecting duplicate benefits, or mismanagement while maintaining accessibility for eligible households?	The utility assistance enrollment process is very effective at preventing fraud and duplication of services already.

Stakeholder Question 3: CHALLENGES OF ADMINISTRATIVE BURDEN	
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)?	For utility assistance, once every three years recertification for elderly and disabled. In Missouri, the state should allow elderly and disabled to use their Social Security award letters as verification of income. Very few on Social Security and Social Security Disability have benefits that change throughout the year. Income verification should still be required for those on Supplemental Social Security. Their benefits can change monthly based on amount of work performed each month.
b. What program design elements would reduce administrative workload while maintaining accurate eligibility determinations?	Utility assistance – provide a better and easier way to prove income eligibility for those on fixed incomes.
c. What strategies from other jurisdictions that have effectively reduced verification or recertification barriers?	Three-year recertification cycles for those on fixed incomes for utility assistance.

Stakeholder Question 4: METRICS AND EVALUATION	
a. What metrics should be used to evaluate program performance, measure impacts, and assess cost-effectiveness?	Number of participants served, number of disconnections prevented, number of households who obtained utility service after shut off, number of returning participants seeking additional assistance. Administrative – staffing levels and caseloads per staff, budget utilization, partner participation and/or resources leveraged.
b. What metrics should be used to evaluate the effectiveness of marketing, education, and outreach efforts?	
c. What customer-experience metrics should be used to evaluate program accessibility, clarity, and ease of navigation, including the application, verification, and enrollment processes?	
d. What metrics should be used to evaluate whether verification requirements are appropriately calibrated to risk?	

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?

Meter tracking. The home associated with weatherization should be tracked for KWH usage and that info should be readily available to utilities, funders, and programs. Historical data would also be welcomed. Client tracking would not work as these investments are long-term and stay with the home.

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?

Yes, clients do not understand rate structures and fees. If they don't understand it, they won't be as in tune with savings and savings opportunities.

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

Fixed charges eliminate the opportunity for savings.

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

Seasonal usage rate changes confuse clients and discourage savings.

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

Time-variant-pricing is extremely unhelpful and confusing for clients and leads to frustration.

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 levelized billing)

The Ameren Keeping Current program is very effective for the participants who are utilizing the program to actually bring their back balance down while also keeping their balance current. Unfortunately, it is not a good fit for clients who are just utilizing it to avoid a disconnect.

Stakeholder Question 7: IMPLEMENTATION CHALLENGES

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

We implement new programs all the time. Challenges come in the red tape required by funders. Getting services to clients is fairly straight forward it's the funder requirements that cause issues.