

**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 27, 2026



**People's Community Action Corporation will act as a catalyst fighting to end poverty
by empowering individuals, families, and communities to thrive.**

Serving the citizens of St. Louis City and Wellston

Organization: PEOPLE'S COMMUNITY ACTION CORPORATION
Name: JIM THOMAS
Title: DIRECTOR OF OPERATIONS
Date of Submission: 04/27/2026
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. Keeping Current 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)

KEEPING CURRENT

Provider Question 1: PROGRAM ADMINISTRATION					
Utility Company		Program Name		State Agency Partner	
Ameren		Keeping Current		na	
Program Start Date	2012	Program End Date		Total # Employ	6
Job Title 1	Case Manager-Energy	Duties	<ul style="list-style-type: none"> • Upload pledges and data into United Way assistance portal • Handle more complex cases • Assist intake as needed 	# Employ	1 FTE
Job Title 2	Intake Specialist	Duties	<ul style="list-style-type: none"> • Agency registration and demographics • Assessments and referrals • Assist clients with applications • Data entry into agency database • Transfer information for upload into United Way portal 	# Employ	2.3 FTE
Annual Average Enrollment #	FFY25 = 859	Monthly Average Enrollment #			
Comments	FFY25 = 859 (includes 219 Keeping Cool) FFY24 = 1525 (includes 294 Keeping Cool) FFY23 = 1452 (includes 334 Keeping Cool)				

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.	
PCAC does not conduct any surveys on the specific operations of this program. However, as a Community Action Agency, we conduct a Community Needs Assessment every three years. The need and demand for utility assistance programs are a part of that Assessment.	

Provider Question 3: STRENGTHS AND WEAKNESSES OF ASSISTANCE PROGRAMS
Based on experience and participant feedback, what are the STRENGTHS of this program?
Of the various programs to which PCAC has access, this is the strongest. <ul style="list-style-type: none"> • It is predictable in the benefits it offers. • It provides excellent incentives for participants to develop positive behaviors for on-time and budgeted payment of regular bills. • It has aspects of arrearage forgiveness. • Budget billing is a very positive aspect of the program, but it can also create mischief at the end of the program if participants do not actually comprehend how it works. (see WEAKNESSES below)
Based on experience and participant feedback, what are the WEAKNESSES of this program?
Conceptually, it has sometimes been difficult for administrative staff to understand. <ul style="list-style-type: none"> • Arrearage payment is by far the most in-demand benefit sought by those coming to PCAC. While Keeping Current provides some arrearage forgiveness, it is at heart not an arrearage program but a behavioral education program. • In the absence of adequate arrearage payment programs elsewhere, it is easy for PCAC employees to turn to Keeping Current as a last-gasp, stopgap measure to help clients in great need. • In looking at enrollments at PCAC over the last three years, there is great variance. This is in part because of PCAC staff gaining a greater understanding of the real purpose of Keeping Current. But it is also, in FY 2025, because new enrollments have stopped due to the program reaching its budgeted cap. • The need for the benefits of this program far outstrip the available resources.

- Although PCAC is one of the most prolific agencies utilizing Keeping Current, it is nonetheless difficult to help clients understand the program. When in crisis, which is when clients show up at our doors, it is difficult to hear about, much less truly comprehend, anything other than help for the immediate crisis.
- Budget billing is a key component of the program but can be difficult to comprehend (crisis circumstances plus possible innumeracy), leading to problems and confusion at the end of a year when the budget amount is adjusted.

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

DOLLAR MORE

Provider Question 1: PROGRAM ADMINISTRATION					
Utility Company		Program Name		State Agency Partner	
Ameren		Dollar More		na	
Program Start Date	2012	Program End Date		Total # Employ	6
Job Title 1	Case Manager-Energy	Duties	<ul style="list-style-type: none"> • Upload pledges and data into United Way assistance portal • Handle more complex cases • Assist intake as needed 	# Employ	0.2 FTE
Job Title 2	Intake Specialist	Duties	<ul style="list-style-type: none"> • Agency registration and demographics • Assessments and referrals • Assist clients with applications • Data entry into agency database • Transfer information for upload into United Way portal 	# Employ	0.3 FTE
Annual Average Enrollment #	FFY25 = 157	Monthly Average Enrollment #			
Comments	FFY24 = 98 FFY23 = 176				

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.	
PCAC does not conduct any surveys on the specific operations of this program. However, as a Community Action Agency, we conduct a Community Needs Assessment every three years. The need and demand for utility assistance programs are a part of that Assessment.	

Provider Question 3: STRENGTHS AND WEAKNESSES OF ASSISTANCE PROGRAMS
Based on experience and participant feedback, what are the STRENGTHS of this program?
Dollar More provides direct assistance to help those with past due bills. <ul style="list-style-type: none"> • This is the primary need of those who come to PCAC for support. • The administering agency has control over how the funding is allocated to clients.
Based on experience and participant feedback, what are the WEAKNESSES of this program?
As with ALL arrearage payment programs—including LIHEAP—the resources available are not adequate to meet the need. <ul style="list-style-type: none"> • Allocations are relatively small and totally unpredictable. It is very difficult to plan, administer, or promote this program. • Ameren (as is also true with Spire and Dollar Help) does not regularly and vigorously promote the program, which is entirely dependent on voluntary donations from utility customers.

- Because at the AGGREGATE level, ALL the arrearage payment programs together are inadequate to meet the need/demand, PCAC like most agencies administering these programs must place various limits and restrictions on the eligibility for and amount of assistance available from these programs.
- This need for limits and restrictions creates a chaotic and burdensome situation for those in need, who must go to multiple agencies and access multiple programs to solve a highly stressed and usually deadline situation of a threatened utility disconnect.
- Again, because of the need for agency enforced limits and restrictions, those seeking help usually cannot access it until they are in the crisis of a utility shut-off scenario.

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

AMEREN ENERGY RELIEF GRANT

Provider Question 1: PROGRAM ADMINISTRATION					
Utility Company		Program Name		State Agency Partner	
Ameren		Energy Relief Grant		na	
Program Start Date	08/2025	Program End Date	12/2025	Total # Employ	6
Job Title 1	Case Manager-Energy	Duties	<ul style="list-style-type: none"> • Upload pledges and data into United Way assistance portal • Handle more complex cases • Assist intake as needed 	# Employ	0.5 FTE
Job Title 2	Intake Specialist	Duties	<ul style="list-style-type: none"> • Agency registration and demographics • Assessments and referrals • Assist clients with applications • Data entry into agency database • Transfer information for upload into United Way portal 	# Employ	1.0 FTE
Annual Average Enrollment #	FFY25 = 377	Monthly Average Enrollment #			
Comments	FFY26 = 189				

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.	
PCAC did not conduct any surveys on the specific operations of this program. However, as a Community Action Agency, we conduct a Community Needs Assessment every three years. The need and demand for utility assistance programs are a part of that Assessment.	

Provider Question 3: STRENGTHS AND WEAKNESSES OF ASSISTANCE PROGRAMS
Based on experience and participant feedback, what are the STRENGTHS of this program?
Ameren’s Utility Relief Grant was extraordinarily well-received by both PCAC staff and clients. <ul style="list-style-type: none"> • It was simple in structure and very easy to explain and understand. • Administration was easy. • It provided assistance outside of the context of crisis intervention. • Particularly in PCAC’s service area of St. Louis City, which had been heavily impacted by the May 16, 2025 tornado, this program was very well-received. • To be honest, this was a public relations win for Ameren. Real goodwill was generated.
Based on experience and participant feedback, what are the WEAKNESSES of this program?
The only implementation issue was ensuring that applicants had not applied at other agencies. I wouldn’t call that a weakness, but just a fact of implementation.
If you have it, please provide empirical and/or anecdotal data that support your comments.

DOLLAR HELP

Provider Question 1: PROGRAM ADMINISTRATION					
Utility Company		Program Name		State Agency Partner	
Spire		Dollar Help		na	
Program Start Date	2012	Program End Date		Total # Employ	6
Job Title 1	Case Manager-Energy	Duties	<ul style="list-style-type: none"> • Upload pledges and data into United Way assistance portal • Handle more complex cases • Assist intake as needed 	# Employ	0.2 FTE
Job Title 2	Intake Specialist	Duties	<ul style="list-style-type: none"> • Agency registration and demographics • Assessments and referrals • Assist clients with applications • Data entry into agency database • Transfer information for upload into United Way portal 	# Employ	0.3 FTE
Annual Average Enrollment #	FFY25 = 32	Monthly Average Enrollment #			
Comments	FFY24 = 129 FFY23 = 78				

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.	
PCAC does not conduct any surveys on the specific operations of this program. However, as a Community Action Agency, we conduct a Community Needs Assessment every three years. The need and demand for utility assistance programs are a part of that Assessment.	

Provider Question 3: STRENGTHS AND WEAKNESSES OF ASSISTANCE PROGRAMS
Based on experience and participant feedback, what are the STRENGTHS of this program?
Dollar Help provides direct assistance to help those with past due bills. <ul style="list-style-type: none"> • This is the primary need of those who come to PCAC for support. • The administering agency has control over how the funding is allocated to clients.
Based on experience and participant feedback, what are the WEAKNESSES of this program?
As with ALL arrearage payment programs—including LIHEAP—the resources available are not adequate to meet the need. <ul style="list-style-type: none"> • Allocations are relatively small and totally unpredictable. It is very difficult to plan, administer, or promote this program. • Spire (as is also true with Ameren and Dollar More) does not regularly and vigorously promote the program, which is entirely dependent on voluntary donations from utility customers. • Because at the AGGREGATE level, ALL the arrearage payment programs together are inadequate to meet the need/demand, PCAC like most agencies administering these programs must place various limits and restrictions on the eligibility for and amount of assistance available from these programs. • This need for limits and restrictions creates a chaotic and burdensome situation for those in need, who must go to multiple agencies and access multiple programs to solve a highly stressed and usually deadline situation of a threatened utility disconnect. • Again, because of the need for agency enforced limits and restrictions, those seeking help usually cannot access it until they are in the crisis of a utility shut-off scenario.
If you have it, please provide empirical and/or anecdotal data that support your comments.

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)?
	This is a huge challenge to assess. <ul style="list-style-type: none"> • Customers in need are almost always reaching out for assistance at a moment of crisis. • The need for arrearage relief to avoid disconnection is front of mind. This is not a moment when they can easily hear messaging and promotion of programs that might enhance stability and reduce repeat need. • Because assistance often comes from widely disconnected sources that even in aggregate have trouble addressing the scale of need, those seeking assistance must navigate multiple applications, limits, and restrictions to cobble together a package of assistance that answers their immediate crisis.
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.)?
	Budget billing and staged arrearage forgiveness together can be a powerful tool. However, a participant must first get through the crisis that brings them to the door of an assistance agency before they can truly understand and benefit from stabilizing programs.
c.	What customer categories (e.g., irregular income, medical debt, unbanked, etc.) are currently underserved or excluded by existing programs?
	The irregularly and part-time employed are most likely to have difficulties in using existing programs. <ul style="list-style-type: none"> • The fact that they are working to some extent creates real challenges in having to visit multiple agencies to construct an assistance package that answers their crisis.
d.	What aspects of existing programs limit or reduce effectiveness (e.g., funding caps, restrictive eligibility windows, administrative barriers, etc.)?
	<ul style="list-style-type: none"> • Program fragmentation is a primary challenge, with sets of different names, qualifications for eligibility, etc. • Inadequate resources in any given program also create an environment where those in need can't get adequate assistance from a single source. Thus they must assemble assistance from multiple sources.
e.	What specific modifications or alternative models (e.g., income-based caps or automatic enrollment) could close identified gaps?

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?
	As a Community Action Agency, PCAC only serves those in its designated geographic service area who are at or below 200% of federal poverty level. <ul style="list-style-type: none"> • Currently, because of the severely restricted resources available to PCAC, there are requirements to first apply for LIHEAP, as well as dollar limits after LIHEAP is applied. • This is not good and enforcement can be demoralizing for agency employees. • PCAC exceptions to the above: medical need, children/seniors in the household
b.	What income thresholds, vulnerability indicators, or energy burden metrics to determine program eligibility?

Obviously for PCAC, a 200% FPL eligibility is easiest. This level closely approximates the LIHEAP 60% state median income threshold.
c. Would automatic or categorical enrollment be effective?
Uniform and cross-program eligibility based on LIHEAP and/or CSBG eligibility would provide a widely accepted threshold. Categorical or transferrable eligibility would be effective.
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?
I'm not certain what post-assistance practices would be feasible without creating undue burdens on households that are by their nature stressed.
e. What program design elements can be included that prevent fraud, collecting duplicate benefits, or mismanagement while maintaining accessibility for eligible households?
Required documentation and record-keeping by administering agencies, followed by agency monitoring.

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)?
Uniform documentation requirements across programs would assist applicants, bringing predictability to the process as applicants move between agencies to assemble a package of assistance.
b. What program design elements would reduce administrative workload while maintaining accurate eligibility determinations?
Consistency across all elements of programs, whether eligibility, application process, recertification, documentation, etc.
c. What strategies from other jurisdictions that have effectively reduced verification or recertification barriers?

Stakeholder Question 4: METRICS AND EVALUATION
a. What metrics should be used to evaluate program performance, measure impacts, and assess cost-effectiveness?
Because there is no unified system or structure for the various programs provided by utilities, it is inherently difficult to assess what works and is cost-effective. My sense is that utilities are doing an improving job of providing data program-by-program, which is certainly a start.
However, using Keeping Current as an example, and where I know the utility employees have been diligent and forthright in gathering and sharing data at its stakeholders meeting, there are large challenges in evaluation.
<ul style="list-style-type: none"> • Program has reached budgeted cap, thereby short-circuiting any understanding of data based on participant demand • Need varies by state of local, state, and national economy. • Residential rates have changed during the life of the program, thus skewing demonstration of need. • No point of data coordination with direct assistance programs, whether LIHEAP or private donation sourced. • It is intuitive that a program like Keeping Current would reduce re-application for crisis assistance. That is the underpinning assumption of the program. Yet there is currently no way to actually test this intuition through quantitative data.
Even within individual programs, there is an important missing piece, which is target setting.
<ul style="list-style-type: none"> • Enforces an upfront evaluation of program resources and capacities. • Provides a benchmark for performance on a quarterly and/or annual basis. • If retrospective analysis shows targets were not accurate, this triggers an evaluation of assumptions about how the program is or is not working.
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?

For this and the above several questions, this seems to me to be a significant challenge. With programs having different purposes (reduction of burden, crisis management, stabilization, special needs) and data in separate silos within utility companies, as well as between companies, it is hard to see how to devise effective metrics without some sort of coordinated or pooled data aggregation and analysis. How do we know if Keeping Current succeeded in reducing repeat crises if we can't make connections between clients of Keeping Current and, say, Dollar More or LIHEAP.

Fragmentation is a huge challenge to understanding the impact and effectiveness of various programs, and how they affect each other in enrollment and success.

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?

Aside from rate structure in detail, the simple and constant increase in rates deeply impacts the customer need and program success.

It seems logical that a low income rate or discount, as is under consideration here, would lessen (but NOT ELIMINATE) the need for crisis assistance followed by stabilization. However, with the disjointed nature of assistance that currently is insufficient to meet need, the actual impact may not be present. If current crisis assistance only addresses, say, 80% of total need, but a low income rate reduces total need by 10%, there will be no actual reduction in the assistance needed or provided, except by regulatory reduction of resources provided.

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

This would vary by utility provider. Ameren's fixed residential rate of \$9 x 12 = \$108 annual. Spire's of \$22 x12 = \$264. Certainly, either amount or the two combined are not insignificant. Still, for a renter whose landlord doesn't care about weatherization and faces a monthly bill of \$250 for electricity through the warm months or for natural gas during the cold months, those amounts pale beside potential arrearages should anything go wrong in that tenant's life—loss of employment, major car repair, unexpected healthcare.

Whether discounts in those amounts are significant enough to prevent delinquent bills or threats of disconnect may be another matter and only measurable with careful data. One must acknowledge that in aggregate, those amounts discounted for low income utility customers will add up for the companies.

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

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

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)

Although they can be a challenge for participants to fully comprehend, programs like Keeping Current and budget billing probably have the best hope of reducing reliance on crisis assistance.

I believe a low income rate or discount could also play a role. It will be important to establish clear and meaningful metrics for success.

Stakeholder Question 7: IMPLEMENTATION CHALLENGES

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

The single biggest challenge for all assistance programs taken as a whole is the inadequate resources available to meet the need. This can of course be expressed in the amount of funding available to those in need. It can also be expressed in the funding available to administer programs.

One can see this in LIHEAP, which is plainly underfunded for administration. Agencies struggle to have sufficient staff to run the program and remain in compliance with program regulations. PCAC does not have the LIHEAP grant but we certainly feel the impact downstream as anxious clients come to us worried that they haven't heard from their LIHEAP agency and can we help? I know from individual conversations with employees at numerous agencies that they struggle to maintain standards for LIHEAP and the stress is so high it is hard to keep good employees.

LIHEAP is outside of the purview of the Commission, but the effects of problems in that program directly impact programs that are under the Commission.

I see several areas where the development of coordinated initiatives and pooled resources might aid all of the programs under consideration here, including any low income rate or discount.

1. Categorical or some form of otherwise uniform eligibility.
2. Harmonization of documentation requirements.
3. Single source navigation of available programs and their requirements. Renew Missouri has created such a site (<https://renewmo.org/resources/missouri-energy-resource-navigator/>). Dedicated funding for them to maintain and update the site would be wise, rather than duplicating their effort elsewhere.
4. A coordinated resource for the development of truly cross-program data to measure and improve performance in a meaningful way, rather than merely within the limits of each individual program or trying to aggregate data piecemeal. I could see a coordinated funding mechanism implemented by the PSC through rate cases to create this resource. Possible homes for this could be the Missouri Community Action Network, the St. Louis Regional Data Alliance, or the University of Missouri Extension Service. Some sort of feasibility study would be needed to determine how to obtain and track meaningful data while protecting the privacy of program participants.