

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

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

**CONSUMERS COUNCIL OF MISSOURI'S
ANSWERS TO STAKEHOLDER SURVEY**

COMES NOW the Consumers Council of Missouri (“Consumers Council” or “CCM”) and submits the following responses to questions issued by the Commission to stakeholders on March 26, 2026. The responses were prepared by Consumers Council’s Director of Advocacy Jacqueline Hutchinson, who has many decades of experience in administering utility assistance programs.

Respectfully submitted,

Dated: April 27, 2026

/s/ John B. Coffman

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Date of Submission: 4/27/2026
Provider? <input 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)
1.
2.
3.

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

Provider Question 1: PROGRAM ADMINISTRATION					
Utility Company		Program Name		State Agency Partner	
Program Start Date		Program End Date		Total # Employ	
Job Title 1		Duties		# Employ	
Job Title 2		Duties		# Employ	
Job Title 3		Duties		# Employ	
Annual Average Enrollment #			Monthly Average Enrollment #		
Comments					

Provider Question 2: EVALUATION FOR EFFECTIVENESS	
Do you conduct surveys to gauge effectiveness of this utility assistance program?	<input 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 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
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?
Based on experience and participant feedback, what are the WEAKNESSES of this program?
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)?

Existing programs such as Keeping Current and Keeping Cool are good at improving household stability on a temporary basis, however, these programs do not necessarily address long term needs of high energy burdened families.

These existing programs help households avoid immediate disconnection and reduce existing arrearages through bill credits or matching incentives. However, because these programs do not adjust the underlying cost of service based on income, most participating households continue to face monthly energy burdens well above affordability thresholds (often 10–15% or more of income). As a result, even successful participants remain at high risk of falling behind again, particularly if they miss payments, experience even minor financial disruption, or reach their term limit on a program, which usually does not exceed two years. Even a small disruption can lead many households to cycle back into debt within one to two years.

It is important to know that, in addition to the Keeping Current and Keeping Cool programs, the existing programs including Critical Medical Needs, New Start, Keeping Cool, Clean Slate, Weatherization, LIHEAP and the Cold Weather Rule, play an important part in protecting the health and safety of Missourians. These programs should continue to exist as part of a comprehensive toolbox of solutions to assure that vulnerable customers and those who have high energy burdens continue to have reasonable access to life-essential utility services.

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.)?

Utility affordability programs are most effective when they align energy costs with household income, reduce existing debt, and prevent future arrearages. Leading Midwest states like Illinois and Ohio have implemented integrated affordability models that stabilize households over time.

Several states have moved beyond traditional assistance programs and effectively created separate rate structures for low-income households, functioning as a distinct customer class within the residential category (a low-income rate class). These programs operate as tariffed sub-classes within the residential class, sometimes with different pricing rules, billing structures, and consumer protections.

The strongest example is found in Pennsylvania, where utilities are required to offer Customer Assistance Programs (CAP). Under Pennsylvania CAP, eligible households are placed on income-based tariffs, meaning their bills are calculated as a percentage of income or a fixed affordable amount, rather than standard usage-based rates. These programs also include automatic arrearage forgiveness, modified collection practices, and enhanced

consumer protections, creating a fundamentally different service model for low-income customers.

Recent research over the past five years reinforces that discount rate and percentage-of-income programs (PIPP) produce significantly better outcomes than traditional utility assistance alone. Evaluations show measurable reductions in arrearages and improved payment stability. For example, a 2025 analysis by the Rocky Mountain Institute found participants in a PIPP-style program saw average arrears decline and an 11-percentage-point increase in households with no past-due balance. Studies in states like New York found participants experienced smaller increases in arrears during COVID-19 compared to nonparticipants. A 2024 national review by NRDC found embedded bill discounts are more cost-effective than traditional collection practices, improve payment rates, and reduce disconnection cycles. Additional analyses confirm the most effective programs target an energy burden in the range of roughly 3–6% of income. These programs structurally reduce arrears and improve long-term stability.

c. What customer categories (e.g., irregular income, medical debt, unbanked, etc.) are currently underserved or excluded by existing programs?

The two classes of customers that I feel are most excluded from assistance are 1) seniors, many of whom are retired professionals from the helping professions, and 2) working families with children, who are barely making ends meet, and which are one emergency away from not being able to pay their basic necessities. Most such customers have incomes just slightly over the qualification threshold, but still cannot absorb the rising cost of all of their basic need. Utility assistance and affordability program should have expanded criteria that would help meet the needs of these families.

d. What aspects of existing programs limit or reduce effectiveness (e.g., funding caps, restrictive eligibility windows, administrative barriers, etc.)?

Funding caps and limited funding, restrictive eligibility, administrative barriers, lack of access or information about the process of receiving such assistance.

e. What specific modifications or alternative models (e.g., income-based caps or automatic enrollment) could close identified gaps?

“Categorical eligibility” is a critical design feature of effective utility affordability programs. States with the most successful programs don’t rely on customers to navigate complex applications, they use existing program enrollment to bring assistance to households automatically. Automatic enrollment based on eligibility for other state and federal programs would reduce barriers to receiving and providing assistance. Those programs could included LIHEAP, Weatherization, SNAP, TANF, Medicaid, WIC, and homes with School Lunch program participation.

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?

Most successful utility affordability programs determine eligibility using a combination of income thresholds, energy burden metrics, and categorical indicators of vulnerability such as participation in programs listed in the above question.

When resources are limited, most programs rely on tiered eligibility and prioritization strategies to direct assistance to those with the greatest need. Households with the lowest incomes, highest energy burdens, active arrearages, or imminent disconnection risk are typically served first, along with vulnerable populations such as seniors, people with disabilities, and families with young children. Benefits may be scaled based on income level, and some programs reduce assistance amounts or limit enrollment when funding is constrained.

b. What income thresholds, vulnerability indicators, or energy burden metrics to determine program eligibility?

Effective utility affordability programs rely on eligibility criteria that balance ease of access, and alignment with actual household need. First, criteria should be grounded in demonstrated need, using income thresholds that cover those on the fringe who may have medical costs or other things not reflected by income tests.

Energy burden measures should be used to ensure that assistance reaches households that cannot reasonably afford their utility bills.

Programs should prioritize administrative feasibility by using categorical eligibility to the greatest feasible extent.

Equally important is accuracy and equity in targeting, ensuring that eligibility rules reflect real-world conditions, including high energy usage due to inefficient housing or medical needs, rather than relying solely on income

c. Would automatic or categorical enrollment be effective?

Automatic enrollment based on eligibility for other state and federal programs would reduce barrier to receiving and providing assistance. Those programs could include LIHEAP, Weatherization, SNAP, TANF, Medicaid, WIC, and homes with School Lunch program participation. Automatic enrollment must be coupled with education to assure that customers fully understand their responsibilities and payment obligations and also have an opportunity to opt out. This education would best be provided by trusted community partners.

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?

Illinois provides a strong example of how utility affordability programs can maintain program integrity without creating unnecessary barriers for applicants. The state of Illinois relies heavily on data matching and categorical eligibility, allowing households already enrolled in programs such as SNAP, SSI, or Medicaid LIHEAP, Weatherization, and other programs to qualify for energy assistance, without requiring the submittal of duplicative income documentation.

e. What program design elements can be included that prevent fraud, collecting duplicate benefits, or mismanagement while maintaining accessibility for eligible households?

Illinois maintains accountability through post-enrollment verification, periodic recertification, and targeted audits, rather than requiring extensive documentation upfront from all applicants. Crisis situations, such as imminent disconnection, are prioritized with expedited enrollment and minimal initial documentation, followed by verification as needed. This balanced approach, verifying eligibility through existing systems, conducting selective audits, and simplifying enrollment, has proven effective at protecting program integrity while ensuring that assistance reaches households quickly and efficiently.

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)?

The listed examples are helpful, in addition to Categorical or automatic eligibility.

b. What program design elements would reduce administrative workload while maintaining accurate eligibility determinations?

In Illinois, verifying eligibility through existing systems, conducting selective audits, and simplifying enrollment, have proven effective at protecting program integrity while ensuring that assistance reaches households quickly and efficiently.

c. What strategies from other jurisdictions that have effectively reduced verification or recertification barriers?

Illinois maintains accountability through post-enrollment verification, periodic recertification, and targeted audits, rather than requiring extensive documentation upfront from all applicants

Stakeholder Question 4: METRICS AND EVALUATION

a. What metrics should be used to evaluate program performance, measure impacts, and assess cost-effectiveness?

Quarterly collaborative meetings that have been successful in the past in helping to design and providing oversight. . Additionally, third party evaluations performed by an independent professional evaluator, the selection of which is agreed upon by the collaborative members is key to continually improve programs. Such independent evaluations should include all aspects of the implementation program, including interviews with recipients.

b. What metrics should be used to evaluate the effectiveness of marketing, education, and outreach efforts?

The quarterly collaboration process should be involved in developing an effective marketing strategy, as members who are program providers often have a better idea as to what would be effective. To whatever extent those non-profit organizations involved with direct services could contract for education and outreach, it would increase the reach of assistance programs.

c. What customer-experience metrics should be used to evaluate program accessibility, clarity, and ease of navigation, including the application, verification, and enrollment processes?

Periodic interviews conducted by a an independent evaluator should be implemented. Metrics can be developed or suggested by third party evaluators, and then be agreed upon by the collaborative parties.

d. What metrics should be used to evaluate whether verification requirements are appropriately calibrated to risk?

Periodic reviews by a third party with expertise in this area should be performed, guided by the collaborative.

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?

Utilities should create a dashboard showing this data and it should be available and transparent to the public. Dashboards can be used to report monthly on arrears, threats and terminations for nonpayment by zip code.

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, there's a direct relationship between utility rate structures and the success of assistance programs. If the underlying rates have no relationship to what households can afford, assistance programs will struggle to produce lasting results.

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

High fixed charges increase energy burden as a share of income, particularly for households that use relatively low amounts of energy but still face the same fixed fee as higher-usage customers. This can lead to situations where customers with the least ability to pay are disproportionately impacted.

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

Seasonal rates can greatly impact those with fixed monthly income as their resources are not flexible. However, budget billing can address the volatility of utility bills,

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

Time variant pricing or (time of use pricing) can have a great budget impact for seniors and others who might be home during the day. It could also impact their health, particularly during the summer when many seniors will choose not to use air conditioning for fear of being cut off. This is the impetus for the Keeping Cool program to assure seniors that they will be able to afford summer cooling despite higher seasonal rates, and therefore not put their health at risk.

Stakeholder Question 6: EFFECTIVENESS ARE 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)

A "Clean Slate" program, defined as forgiving all arrears and setting up a monthly affordable payment plan with credits to make payments affordable, is the most successful model for successful for helping families emerge from a crisis.

Stakeholder Question 7: IMPLEMENTATION CHALLENGES

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

Launching any new utility affordability program requires careful planning to address implementation challenges. Coordinating across state agencies, utilities, and non-profits often requires new data agreements, technology upgrades, and privacy safeguards, which can delay rollout if not addressed early. This should be done with a collaborative of parties who will implement or provide oversight, ideally on a quarterly basis. Administrative capacity is a critical, agencies and utilities must be equipped to handle all changes necessary to implement the new systems. Other potential barriers could be created by proposed changes to eligibility requirement imposed by the general assembly such as work requirements for benefits. Failure to assure that there is adequate funding to cover this administrative cost for all aspects included in implementation, education and oversight could result in delays in getting the project off the ground.

Additionally, proposed changes to Medicaid and SNAP could limit access to utility help programs that use categorical eligibility. By making it harder to meet work requirements, increasing how often you need to renew eligibility, and adding extra paperwork and costs, these changes could decrease the number of people enrolled and cause more to drop out,

even if their financial situation hasn't changed. Since Medicaid and SNAP participation often determines income eligibility, fewer enrolled people means fewer automatically get utility help. This can lead families into difficult application processes or bar them entirely. Plus, new copayments and restrictions on benefits will add strain to tight budgets, increasing energy costs while access is shrinking. Altogether, these changes could weaken the effectiveness of utility help programs, leaving more vulnerable Missourians at risk of losing essential services.