

# 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 )  
Programs and Special Alternative )  
Residential Customer Rates )

**File No. OW-2026-0085**

## ORDER REQUESTING RESPONSES AND SCHEDULING WORKSHOP

Issue Date: March 26, 2026

Effective Date: March 26, 2026

The Commission opened this working case to review currently existing utility assistance programs and further gather information on how best to implement the special alternative residential customer rates or bill discounts contemplated by Section 393.1680, RSMo. The Commission directed regulated utilities to provide information regarding their utility assistance programs. Commission Staff conducted follow up meetings and additional information was filed in the case.

The Commission now finds it would be helpful to receive information from other stakeholders, including stakeholders who administer utility assistance programs. The Commission is including a series of questions and information requests with this order and is providing the opportunity for stakeholders to respond.

The Commission will also schedule a workshop meeting in this matter for stakeholders to attend. The workshop meeting will be held on June 2, 2026, in Room 450 of the Governor Office Building. More information about registration and the agenda for the workshop meeting will be filed in this case.

As this is not a contested case, anyone may file a response or comment without legal counsel and without ex parte constraints. Intervention requests are not necessary to submit comments or view documents.

The public is welcome to submit comments online, by email, in writing or by telephone. All comments should reference related submission number OW-2026-0085. Electronic comments may be submitted through the Commission's website at <https://psc.mo.gov>. (Click on the Submit Comments link on the upper right side of the page.) Comments in hard copy should be addressed to the Commission, Attn: Consumer Services Unit, at P.O. Box 360, Jefferson City, Missouri, 65102. E-mailed comments may be sent to [pscinfo@psc.mo.gov](mailto:pscinfo@psc.mo.gov) and telephone comments may be made by calling 1-800-392-4211<sup>1</sup>.

The public can view the contents of the file by accessing the Commission's E-Filing system (EFIS) on the Commission's website at <https://psc.mo.gov>.

**THE COMMISSION ORDERS THAT:**

1. Stakeholders are invited to provide responses and comments to the questions and information requests in Attachment A no later than April 27, 2026.
2. The Commission will schedule an in-person only workshop meeting on June 2, 2026, in the Governor Office Building, Room 450, 200 Madison St., Jefferson City, MO 65102.
- 3 This order shall be effective when issued.

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<sup>1</sup> TTY: 1-866-735-2460. Relay Missouri: Dial "711" and ask for 1-800-392-4211.



Dippell

**BY THE COMMISSION**

*Nancy Dippell*

Nancy

Secretary

Ronald D. Pridgin, Deputy Chief  
Regulatory Law Judge, by delegation  
of authority pursuant to Section  
386.240, RSMo 2016.

Dated at Jefferson City, Missouri, on  
this 26<sup>th</sup> day of March, 2026.

## 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. Please include the following:

1. List the name of each assistance program that you help/helped administer and include your utility partner (i.e., Ameren, Evergy Metro and/or West, Missouri-American Water, Summit Gas, Liberty Utilities (Empire), Spire Gas). If you work directly with a state agency, please list the state agency.
  - a. If your organization is a current program administrator, please provide the initial date of the contract for each program. If your organization no longer assists with the administration of a utility assistance program, please provide the timeframe in which you were contracted to administer the program(s).
  - b. How many employees from your organization perform or performed intake and approval for each program? Please break down the duties for each employee assigned to processing applications.
  - c. For each program, please provide the average number of applications that are processed each month. If there are seasonal changes or other factors that increase or decrease the number of assistance requests, please explain.
2. Does your organization conduct internal surveys or evaluations to gauge the effectiveness of the programs that you help or helped administer? If yes, please explain the process and indicate whether the results are shared with utility partners and/or state agencies.
3. Based on your experience and feedback from customers that participate in assistance programs, what are the strengths and weaknesses of each program that you help or helped administer? If you have empirical and/or anecdotal support for your comments, please provide them as well.

## 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.

1. Please provide information on the adequacy of any existing programs in reducing disconnections and arrearages for high-burden households. Specifically:
  - a. The degree to which current programs improve long-term household stability (e.g., reduction in "repeat" shutoffs) versus providing one-time crisis relief,  
Our data indicates that 59% of our customers who have received LIHEAP assistance since October 1, 2025, have also received at least one intent to disconnect notice. Of those customers, 80% have received multiple intent to disconnect notices.
  - b. The specific program features (e.g., predictable monthly payments, income-based caps, arrearage forgiveness, and hardship protections) demonstrated to be most effective at stabilizing households and preventing "repeated cycles" of late payments,  
City Utilities offers flexibility with payment arrangements. By meeting customers where they are and allowing them to make multiple payment arrangements within the year, we have managed to keep our arrears at a minimum and our bad debt write off to less than one third of a percent. Of the customer accounts that received a LIHEAP payment since October 1, 2025, 55% of the accounts have a current balance where 31% have a balance with a 31–60-day arrears, 12% have a 61–90-day arrears, and 2% have a 91+ day arrearage.
  - c. The customer categories (e.g., irregular income, medical debt, unbanked) currently underserved or excluded by these programs,  
From our experience the elderly population is the most underserved. These customers are either not aware of the program, or they are too proud to ask for assistance.
  - d. The primary factors limiting the effectiveness of current designs, such as funding caps, restrictive eligibility windows, or administrative barriers, and  
We receive feedback from customers regarding the administrative aspects of the program. Some customers experience difficulty with completing the application – either due to the complexity of the questions or limited access to a computer. To address this, we provide printed copies of the application each year, making them readily available in our lobby. We also offer to mail applications directly to the customer’s home upon request.
  - e. The specific modifications or alternative models (e.g., income-based caps or automatic enrollment) that could close identified gaps.  
It is helpful that previous LIHEAP applicants receive an application each year, as this supports a smoother enrollment process. Automatic enrollment could offer additional benefits. For example, only 57% of our customers who received assistance during the 2024-2025 program year have received assistance this year. If program administrators have access to household and financial information, they may be able to pre-approve eligible clients or streamline the application process, reducing the need for customers to reapply annually. This would save time for clients and enable them to receive assistance more quickly, potentially preventing utility service disconnections. In turn, this could help customers manage their balances more effectively and avoid accumulating large past-due amounts.

2. What criteria and mechanisms should be used to determine program enrollment? Please provide any information or suggestions on the following:
  - a. Principles that should be used to establish eligibility criteria (e.g., need, administrative feasibility, accuracy, and alignment with household need) and how to prioritize access to assistance when resources are limited,  
It can be challenging to recommend how to prioritize access to assistance, as every customer's situation is urgent from their perspective. However, when resources are limited, it may be appropriate to prioritize support for vulnerable populations, such as elderly individuals and households with children.
  - b. Income thresholds, vulnerability indicators, or energy burden metrics for determining program eligibility,  
Some of the customers applying for assistance do not have a steady or consistent income, which can result in them being ineligible one month but qualifying the next. Addressing income variability along with prioritizing vulnerable populations could help improve the efficiency and fairness of the application and approval process.
  - c. Effectiveness of automatic enrollment,  
Other than the State providing customers with an application each year, we do not have experience with automatic enrollment.
  - d. Risk-management practices (e.g., random audits, post-enrollment verification, data-matching) that are effective without creating undue burden for applicants, and  
City Utilities participates in random audits related to our LIHEAP processing procedures. Conducting regular audits of both the administering agency and the utility provider helps ensure that all parties are adhering to the standards established in the LIHEAP contract.
  - e. Program design elements that prevent fraud, collecting duplicate benefits, or mismanagement while maintaining accessibility for eligible households.  
Our internal LIHEAP program includes safeguards to ensure that the Social Security number provided on an application matches the information in our Customer Information System. In addition, both our organization and OACAC have measures in place to prevent customers from submitting multiple applications.
  
3. Please describe:
  - a. Administrative practices that reduce customer burden and streamline application, verification, and recertification processes (e.g., short-form applications, online portals, single-point-of-entry systems),  
Allowing previous applicants to use a short-form application could reduce processing time for administrators and help clients receive assistance more quickly. For applicants who have applied in prior years, it may be beneficial to require only updates to any changes in income or household status, rather than a full application each year. While online portals can be effective, not all clients have access to digital tools, and some may face challenges using them.

- b. Program design elements that reduce administrative workload while maintaining accurate eligibility determinations, and  
City Utilities has not been involved in the design of the LIHEAP program and does not participate in its administration.
  - c. Strategies from other jurisdictions that have effectively reduced verification or recertification barriers.  
We are not aware of any strategies from other jurisdictions.
4. Please identify and provide any information on the following:
- a. Metrics that should be used to evaluate program performance, measure impacts, and assess cost-effectiveness,  
The following metrics could be useful when evaluating program performance:
    - Tracking the number of returning applicants each year can help assess whether the need for assistance is decreasing over time.
    - Measuring the turnaround time from application submission to processing, and from processing to disbursement of payment, can help evaluate program efficiency and cost-effectiveness. Additionally, it may be worth considering whether increasing staffing levels could reduce turnaround times and enable clients to receive benefits more promptly.
  - b. Metrics for evaluating the effectiveness of marketing, education, and outreach efforts,  
Tracking the number of new applicants each year could assist with the evaluation of marketing, education, and outreach efforts. Daily, we speak with customers who are unfamiliar with the LIHEAP program.
  - c. Customer-experience metrics that should be used to evaluate program accessibility, clarity, and ease of navigation, including the application, verification, and enrollment processes,  
Conducting a customer survey for LIHEAP applicants after they have applied for assistance could provide valuable insight into the application experience, including how accessible the application was to obtain, how easy the application was to complete, and whether the instructions were clear and easy to understand.
  - d. Metrics for evaluating whether verification requirements are appropriately calibrated to risk, and
  - e. Metrics that should be used to assess whether programs improve long-term household stability, reduce arrearages, prevent disconnections, and support energy-efficiency or weatherization investments.  
The following metrics could be helpful:
    - How many clients received an intent to disconnect notice(s) after receiving assistance?
    - What do the arrears of each client's account indicate? Did they remain current after receiving assistance.

5. Please identify and evaluate:
  - a. The relationship between utility rate structures and the success of assistance programs.
  - b. How the following rate design elements affect households with limited or no income flexibility:
    - i. fixed charges
    - ii. seasonal usage and rates
    - iii. time-variant pricing

Our rate structure does not impact the energy assistance programs.

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

We do not offer a debt forgiveness program however we do offer Level Pay to all our customer. Currently, only 160 customers who received LIHEAP benefits this year are enrolled in our Level Pay program.

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

The biggest challenge on the utility side would be the coordination of any new program with the utility software. We would need time to make the necessary changes on our side to accommodate the requirements of the program.

**STATE OF MISSOURI**

**OFFICE OF THE PUBLIC SERVICE COMMISSION**

**I have compared the preceding copy with the original on file in this office and I do hereby certify the same to be a true copy therefrom and the whole thereof.**

**WITNESS my hand and seal of the Public Service Commission, at  
Jefferson City, Missouri, this 26<sup>th</sup> day of March 2026.**



*Nancy Dippell*

Nancy Dippell

Secretary

**MISSOURI PUBLIC SERVICE COMMISSION**

March 26, 2026

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Case

No: OW-2026-0085

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Enclosed find a certified copy of an Order or Notice issued in the above-referenced matter(s).<sup>1</sup>

Sincerely,

*Nancy Dippell*

Nancy Dippell

Secretary

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<sup>1</sup> Recipients listed above with a valid e-mail address will receive electronic service. Recipients without a valid e-mail address will receive paper service.

