

**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: May 11th, 2026



Name of Agency: Delta Area Economic Opportunity Corporation

Mission Statement of agency: The Mission of Delta Area Economic Opportunity Corporation, a community action agency, is to empower people to make positive change in their personal lives, family and community.

Vision Statement of Agency: Delta Area Economic Opportunity Corporation (DAEOC) is a 501 (3)c not-for-profit organization that assists those living in poverty across six Missouri Bootheel counties: Scott, New Madrid, Mississippi, Stoddard, Dunklin, and Pemiscot. As a Community Action Agency, DAEOC has its roots in Lyndon B. Johnson's War on Poverty and was established in 1965 as one of the first CAAs in the state of Missouri. Today, there are nineteen of these agencies; all having the explicit purpose of providing social services that stabilize households, empower individuals, and advocate for those living below the poverty line.

Organization: Delta Area Economic Opportunity Corporation
Name: Tara Ruby
Title: Community Services Unit Lead
Date of Submission: 5/11/2026
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. LIHEAP 2. Weatherization 3. Dollar More

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			
Program Start Date	1981	Program End Date		Total # Employ	17
Job Title 1		Duties		# Employ	
Job Title 2		Duties		# Employ	
Job Title 3		Duties		# Employ	
Annual Average Enrollment #	10,000	Monthly Average Enrollment #		833	
Comments					

Provider Question 2: EVALUATION FOR EFFECTIVENESS	
Do you conduct surveys to gauge effectiveness of this utility assistance program?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
Do you conduct any non-survey evaluations to gauge effectiveness of this program?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
Do you share the results...with utility partners? <input type="checkbox"/> 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.	
We have a customer satisfaction survey that is located at each of our outreach locations and we also complete a community needs assessment every 3 years.	

Provider Question 3: STRENGTHS AND WEAKNESSES OF ASSISTANCE PROGRAMS
Based on experience and participant feedback, what are the STRENGTHS of this program?
Prevents utility disconnect, helps with mental health from not having to worry if utilities will be shut off,
Based on experience and participant feedback, what are the WEAKNESSES of this program?
Application process, limited funding
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	
		Weatherization			
Program Start Date	1976	Program End Date		Total # Employ	6
Job Title 1		Duties		# Employ	
Job Title 2		Duties		# Employ	
Job Title 3		Duties		# Employ	
Annual Average Enrollment #	75	Monthly Average Enrollment #		6	
Comments					

Provider Question 2: EVALUATION FOR EFFECTIVENESS	
Do you conduct surveys to gauge effectiveness of this utility assistance program?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
Do you conduct any non-survey evaluations to gauge effectiveness of this program?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
Do you share the results...with utility partners? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> ...with state agencies?	<input checked="" 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?	
Lowering heating and cooling bills. People that do not have heat are able to receive HVAC in their homes.	
Based on experience and participant feedback, what are the WEAKNESSES of this program?	
It's a slow process due to lack of qualified contractors, state credentials and the amount of documents needed to receive 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	
Ameren		Dollar More			
Program Start Date	2008	Program End Date		Total # Employ	4
Job Title 1		Duties		# Employ	
Job Title 2		Duties		# Employ	
Job Title 3		Duties		# Employ	
Annual Average Enrollment #	85	Monthly Average Enrollment #		7	
Comments					

Provider Question 2: EVALUATION FOR EFFECTIVENESS	
Do you conduct surveys to gauge effectiveness of this utility assistance program?	<input checked="" type="checkbox"/> Yes <input checked="" type="checkbox"/> No
Do you conduct any non-survey evaluations to gauge effectiveness of this program?	<input checked="" type="checkbox"/> Yes <input checked="" type="checkbox"/> No
Do you share the results...with utility partners? Yes <input checked="" type="checkbox"/> No <input 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.	
We have a customer satisfaction survey that is located at each of our outreach locations and we also complete a community needs assessment every 3 years.	

Provider Question 3: STRENGTHS AND WEAKNESSES OF ASSISTANCE PROGRAMS	
Based on experience and participant feedback, what are the STRENGTHS of this program?	

Helps avoid utility disconnect
Based on experience and participant feedback, what are the WEAKNESSES of this program?
Only involves Ameren customers
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)?
LIHEAP is effective at preventing immediate disconnections and providing crisis relief, but long-term stability is limited when assistance is only one-time support. Programs combined with weatherization, budgeting, and case management are more effective long term
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, payment plans
c. What customer categories (e.g., irregular income, medical debt, unbanked, etc.) are currently underserved or excluded by existing programs?
Households with irregular income, working families slightly over income limits, medical debt
d. What aspects of existing programs limit or reduce effectiveness (e.g., funding caps, restrictive eligibility windows, administrative barriers, etc.)?
Eligibility limits, limited funding, staffing
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?
Eligibility should prioritize vulnerable households, including elderly individuals, disabled individuals, families with children, and households facing disconnection, while balancing fairness and administrative efficiency
b. What income thresholds, vulnerability indicators, or energy burden metrics to determine program eligibility?
Income, medical needs, vulnerable households
c. Would automatic or categorical enrollment 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?
File reviews, staff training
e. What program design elements can be included that prevent fraud, collecting duplicate benefits, or mismanagement while maintaining accessibility for eligible households?

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)?
b. What program design elements would reduce administrative workload while maintaining accurate eligibility determinations?
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?
Number of households served, cost per household served
b. What metrics should be used to evaluate the effectiveness of marketing, education, and outreach efforts?
Number of applications received, social media engagement, increase in first time participants
c. What customer-experience metrics should be used to evaluate program accessibility, clarity, and ease of navigation, including the application, verification, and enrollment processes?
Customer satisfaction surveys, number of complaints, processing times
d. What metrics should be used to evaluate whether verification requirements are appropriately calibrated to risk?
Number of missing documents during file review, number of processing delays
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?
Reduced repeated crisis applications, lower arrearage balances, reduced disconnections, overall participation

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. Higher fixed costs and seasonal spikes can increase energy burden and make it harder for households to remain current on utility bills
B31. How does the rate design element of fixed charges affect households with limited or no income flexibility?
High fixed charges can negatively affect low-income households because costs remain high even when energy usage is reduced, limiting flexibility to lower bills
b2. How does the rate design element of seasonal usage and rates affect households with limited or no income flexibility?
Seasonal rates and high winter or summer usage can create sudden increases in utility bills, making it difficult for households with limited income to maintain payments consistently
b3. How does the rate design element of time-variant pricing affect households with limited or no income flexibility?
Time-variant pricing may benefit some households but can create challenges for low-income families who cannot easily shift energy use to lower-cost times due to work schedules, medical needs, or household demands.

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)

Stakeholder Question 7: IMPLEMENTATION CHALLENGES

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

Limited staff, increased application volume, delays in systems or tech updates, coordinating with utility vendors and partner agencies