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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: 4/20/2026

Name of Agency:

Ozark Action Inc.

Mission Statement of agency:

The Mission of Ozark Action Inc. is to coordinate and provide services for people with needs so that they can improve their quality of life.

Vision Statement of Agency:

OAI works with Communities, Organizations, and Residents to:

Provide Services to Improve Lives – Maximize opportunities and resources to help individuals and families move from poverty to self-sufficiency.

Empower All People – Assist people in realizing their full potential by encouraging participation in decisions that impact their lives.

Create Stronger Communities – Collaborate with partners so individuals, families, and communities can thrive.

*Investing in families in Douglas, Howell, Oregon, Ozark, Texas and Wright Counties
“An Equal Opportunity Employer”*

www.oaiwp.org • www.facebook.com/OzarkAction • www.twitter.com/OzarkActionInc

Organization: Ozark Action Inc.
Name: Terry Sanders
Title: Executive Director
Date of Submission:
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. Low Income Weatherization Assistance Program (LIWAP) 2. LIHEAP 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

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	
Summit Natural Gas		Weatherization				
Program Start Date	Est 2015	Program End Date		Total # Employ	7	
Job Title 1	Housing Director	Duties	Manage Program	# Employ	1	
Job Title 2	Weatherization Coordinator	Duties	Administrative functions	# Employ	1	
Job Title 3	Field Services Mgr/Final Inspect	Duties	Supervise field staff/perform final inspections	# Employ	1	
Job Title 4	Energy Auditor	Duties	Perform initial inspection/energy audits, develop ECM workplan	# Employ	1	
Job Title 5	Crew members	Duties	Complete work on homes/install ECMs	# Employ	3	
Annual Average Enrollment #		10 – 15	Monthly Average Enrollment #	1		
Comments	Only for customers of Summit Natural Gas					

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 checked="" type="checkbox"/> No ...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? Slightly more flexibility than the federally funded weatherization programs.
Based on experience and participant feedback, what are the WEAKNESSES of this program? Insufficient funding to have a huge benefit.
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	
		DOE Weatherization		MO DNR	
Program Start Date	1977	Program End Date		Total # Employ	7
Job Title	Housing Director	Duties	Manage Program	# Employ	1
1					

Job Title 2	Weatherization Coordinator	Duties	Administrative functions	# Employ	1
Job Title 3	Field Services Mgr/Final Inspect	Duties	Supervise field staff/perform final inspections	# Employ	1
Job Title 4	Energy Auditor	Duties	Perform initial inspection/energy audits, develop ECM workplan	# Employ	1
Job Title 5	Crew members	Duties	Complete work on homes/install ECMs	# Employ	3
Annual Average Enrollment #	70	Monthly Average Enrollment #	6		
Comments	DOE funding currently includes BIL funds. All homes are split funded across programs to maximize benefits to Missourians.				

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 type="checkbox"/> Yes <input checked="" type="checkbox"/> No	
If you conduct surveys or other evaluations, please explain the process you use.	
All homes final inspected by QCI certified inspector.	

Provider Question 3: STRENGTHS AND WEAKNESSES OF ASSISTANCE PROGRAMS	
Based on experience and participant feedback, what are the STRENGTHS of this program? Excellent program. Ability to braid funding across programs improves efficiency and maximizes benefits.	
Based on experience and participant feedback, what are the WEAKNESSES of this program? Insufficient funding results in continual wait list for 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	
		LIHEAP Weatherization		MO DNR & DSS	
Program Start Date	Est 2015	Program End Date		Total # Employ	7
Job Title 1	Housing Director	Duties	Manage Program	# Employ	1
Job Title 2	Weatherization Coordinator	Duties	Administrative functions	# Employ	1

Job Title 3	Field Services Mgr/Final Inspect	Duties	Supervise field staff/perform final inspections	# Employ	1
Job Title 4	Energy Auditor	Duties	Perform initial inspection/energy audits, develop ECM workplan	# Employ	1
Job Title 5	Crew members	Duties	Complete work on homes/install ECMs	# Employ	3
Annual Average Enrollment #		10 – 15	Monthly Average Enrollment #	1	
Comments	All homes are split funded across programs to maximize benefits to Missourians.				

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 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? Slightly more flexibility than the federally funded weatherization programs.	
Based on experience and participant feedback, what are the WEAKNESSES of this program? Insufficient funding to have a huge benefit.	
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	
		LIHEAP Energy Assistance		MO DSS	
Program Start Date	Est 2015	Program End Date		Total # Employ	7
Job Title 1	CSBG/LIHEAP Director	Duties	Manage Program	# Employ	1
Job Title 2	Community Services Pgm Manager	Duties	Manages LIHEAP/ECIP Programs	# Employ	1
Job Title 3	Customer Svc Representative	Duties	Reviews, verifies, processes customer applications for assistance	# Employ	9

Annual Average Enrollment #	6000	Monthly Average Enrollment #	500
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 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?
Based on experience and participant feedback, what are the WEAKNESSES of this program? Insufficient funding to meet need/demand. Funding has not kept up with inflation/rise in energy costs.
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)?

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.)?

A severe shortage of affordable/available housing results in many lower income households being forced to live in poor quality, very energy inefficient housing.

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

A single individual working full time at Missouri minimum wage will generally not qualify for assistance. Same for a family of 4 with 2 full time workers at min wage. In both cases, this is not a livable wage.

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

Max annual assistance is not sufficient in many cases. Some households are forced to make decisions to pay utilities, rent, food, or medical costs.

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?

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

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?

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

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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)?

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

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

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Stakeholder Question 4: METRICS AND EVALUATION

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

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

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

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

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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?

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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?

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

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

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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)

Stakeholder Question 7: IMPLEMENTATION CHALLENGES

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