

**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: 5/11/26



Name of Agency: Community Action Agency of St. Louis County, Inc. - CAASTLC

Mission Statement of agency: The mission of CAASTLC is to stabilize and enrich vulnerable households by instilling hope and creating pathways to empowerment. We are committed to helping the families and communities of St. Louis County transition from poverty to self-sufficiency for present and future generations.

Vision Statement of Agency:

- Healthy families thriving in their community free from poverty and social exclusion.
- A wide range of opportunities and accessibility to education, healthcare, careers, and safe, affordable, energy efficient housing
- Inclusive communities that sustain economic opportunities and business growth
- Communities where everyone is treated with dignity and respect and the barriers of structural and systemic inequities have been removed.

Organization: CAASTLC
Name: Georgie Donahue
Title: Director Program Administration
Date of Submission: 5/11/26
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 Help 4. Dollar More 5. Critical Medical Needs 6. Keeping Current 7. H2O Help to Others 8. Heat Up/Cool Down St. Louis 9. EA – Ameren 10. Ameren -Keeping Cool 11. Spire – Customer Charge Waiver Program 12. Ameren – Clean slate 13. Spire Red Tag 14. MSD - CAP

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		CAASTLC	
Program Start Date	1987, 88?	Program End Date	current	Total # Employ	Varies 15-25
Job Title 1	Dir. Prog. Admin	Duties	Oversees budget, staffing, daily operations	# Employ	1
Job Title 2	LIHEAP Manager	Duties	Hands on daily operation, training staff	# Employ	1
Job Title 3	Team Leads	Duties	Work with assigned staff on assigned tasks	# Employ	3
Job Title 4	Data Entry/Customer Service staff	Duties	Register, process, pledge, MIS entry, mail, emails, faxes, customer service, vendor verification, phone calls	# Employ	12-21
Annual Average Enrollment #	17,000	Monthly Average Enrollment #	Varies 300-1,700		
Comments	Everyone must reapply at the start of each program year. It is impossible to register and process the applications in a timely manner due to the high demand at the beginning of the program every year.				

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 checked="" type="checkbox"/> Yes <input type="checkbox"/> No ...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 conduct client satisfaction surveys each year and since the majority of our clients participate in the LIHEAP program, client comments are often focused on LIHEAP. Every 3 years we conduct a Comprehensive Community Needs Assessment, (CAN) the involves written surveys and focus groups. Again, LIHEAP is always a focus. Our CAN is submitted to the state, shared with community partners, and posted on our website.	

Provider Question 3: STRENGTHS AND WEAKNESSES OF ASSISTANCE PROGRAMS	
Based on experience and participant feedback, what are the STRENGTHS of this program?	
It literally saves lives. It keeps electricity in the home to provide heat, cool air, and appliances operating. Gas provides heat and hot water for clients with gas appliances. Thousands would be left without heat and lights if not for the LIHEAP program. The LIHEAP EA onetime payment often stabilizes seniors; they typically do not return during the program year for any crisis funds. A strength of the EA program is that a disconnect notice is not required.	
Based on experience and participant feedback, what are the WEAKNESSES of this program?	
<ul style="list-style-type: none"> • Every year it is the same inefficient application process, elderly and disabled apply in October, no payments processed until November, everyone else can apply in November, no payments processed until December. This practice consistently leaves the most vulnerable households under constant stress while waiting along with thousands for their applications to be registered and processed. • The application is long and complicated. Every year approximately 50% of all applications received are incomplete which causes a delay in processing while we send a letter requesting additional documents. When the documents are submitted the application must be located and worked again causing more delays and duplicative work. • The elderly and disabled on a fixed income do not see a significant change in their income from year to year but must complete the entire application process every year. As technology progresses they are often left behind in understanding the process of applying online and accessing their accounts online for updates. Their applications are often incomplete and delayed in processing, which puts this very vulnerable population at further risk of disconnection. 	

- Education on how to manage utilities is not currently a part of the LIHEAP program. As utility rates continue to rise the LIHEAP eligible households need the tools to understand how to manage their utilities. Instead, we provide an entitlement program that increases dependency for our clients.
- The LIHEAP payment amounts have not increased to keep pace with the increasing utility bills our clients are faced with. The exception was during the COVID years. Increasingly our clients are maxing out their eligibility for crisis funds in the winter before the cold months have passed. Maximum assistance is \$800. The maximum ECIP amount of \$300 in the summer is often the amount of 1 or 2 months in bills leaving our clients to constantly struggle with the threat of disconnection July – September.
- Must be in threat of disconnect to receive crisis funds. We are seeing a significant number of accounts with extremely high bills, over \$2,000 that are not in disconnect status, so we are unable to help. When they finally get a disconnect notice the bill is so high that we do not have enough funds to prevent the disconnection.

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	Prior to 1982	Program End Date	current	Total # Employ	Same as LIHEAP
Job Title 1	All the same as LIHEAP	Duties		# Employ	
Job Title 2		Duties		# Employ	
Job Title 3		Duties		# Employ	
Annual Average Enrollment #	337 in 2025	Monthly Average Enrollment #			
Comments	Dollar More is used when LIHEAP funds have been exhausted. More and more clients are maxing out of Dollar More funds before the program year expires. Number of households assisted based on funds available to our agency.				

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? <input checked="" type="checkbox"/> Yes <input 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.
When clients apply for LIHEAP we automatically apply whatever funds we have available to meet the need for reconnection or to prevent disconnection. Clients are not aware that they are applying for ECIP, Dollar More, Dollar Help, or whatever funds we have available. They just know whether we have been able to prevent the disconnection. When there are not enough combined funds to meet the minimum payment clients are notified of an additional payment that they need to make. They receive a detailed listing of the fund sources and dollar amount that were used to assist them.

Provider Question 3: STRENGTHS AND WEAKNESSES OF ASSISTANCE PROGRAMS	
Based on experience and participant feedback, what are the STRENGTHS of this program?	
<ul style="list-style-type: none"> Dollar More keeps the lights on when LIHEAP funds have been exhausted. The funding has been increased so we are able to help additional families, but the maximum allocation has remained at \$600. Flexibility allows us to assist even if the household is not off or in disconnect status. Flexibility allows us to assist based on needed opposed to strict income guidelines. Application process is simple; it is determined by the LIHEAP application. No additional information is needed. 	
Based on experience and participant feedback, what are the WEAKNESSES of this program?	
<ul style="list-style-type: none"> Limited maximum payment of \$600. Not enough overall funding to meet needs. Short term solution. Does not provide stability. 	
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		Keeping Current			
Program Start Date	Late 1990's?	Program End Date	current	Total # Employ	Same as LIHEAP
Job Title 1	All the same as LIHEAP	Duties		# Employ	
Job Title 2		Duties		# Employ	
Job Title 3		Duties		# Employ	
Annual Average Enrollment #		193 in 2025	Monthly Average Enrollment #		
Comments	Would have enrolled more but the funds were frozen.				

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? <input checked="" type="checkbox"/> 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.
When clients apply for LIHEAP we automatically apply whatever funds we have available to meet the need for reconnection or to prevent disconnection. Clients are not aware that they are applying for ECIP, Dollar More, Dollar Help, or whatever funds we have available. They just know whether we have been able to prevent the disconnection. When there are not enough combined funds to meet the minimum payment clients are notified of an additional payment that they need to make. They receive a detailed listing of the fund sources and dollar amount that were used to assist them.

Provider Question 3: STRENGTHS AND WEAKNESSES OF ASSISTANCE PROGRAMS
Based on experience and participant feedback, what are the STRENGTHS of this program?
<ul style="list-style-type: none"> Helps client's budget with regular payments with instant rewards and prevents disconnection. Helps to reduce arrears.
Based on experience and participant feedback, what are the WEAKNESSES of this program?

<ul style="list-style-type: none"> • If the budgeted monthly amount is higher than the client can pay, the program does not work and becomes a crisis, temporary solution. • When one payment is missed, the client is put out of the program, and they must pay the entire amount due to prevent disconnection. • It is complicated for the client to understand. • Can not be enrolled in Keeping Cool and Keeping Current at the same time.
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		Energy Relief - ER			
Program Start Date	2025	Program End Date	current	Total # Employ	Same as LIHEAP
Job Title 1	All the same as LIHEAP	Duties		# Employ	
Job Title 2		Duties		# Employ	
Job Title 3		Duties		# Employ	
Annual Average Enrollment #	1,848 in 2025	Monthly Average Enrollment #			
Comments	Onetime payment of \$150. No disconnect is required but must owe more than \$150 because no credit can be created.				

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.
When clients apply for LIHEAP we automatically apply whatever funds we have available to meet the need for reconnection or to prevent disconnection. Clients are not aware that they are applying for ECIP, Dollar More, Dollar Help, or whatever funds we have available. They just know whether we have been able to prevent the disconnection. When there are not enough combined funds to meet the minimum payment clients are notified of an additional payment that they need to make. They receive a detailed listing of the fund sources and dollar amount that were used to assist them.

Provider Question 3: STRENGTHS AND WEAKNESSES OF ASSISTANCE PROGRAMS
Based on experience and participant feedback, what are the STRENGTHS of this program?
<ul style="list-style-type: none"> • Client does not need to be off or in threat of disconnection to receive this one-time payment. • Easy application, if eligible for LIHEAP, eligible for ER. • Can be used to bundle payments to stop disconnection.
Based on experience and participant feedback, what are the WEAKNESSES of this program?
<ul style="list-style-type: none"> • Must owe at least \$150 to be eligible. Must get the entire amount at one time.
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		Keeping Cool			
Program Start Date	Late 1990's	Program End Date	Current	Total # Employ	Same as LIHEAP
Job Title 1	All the same as LIHEAP	Duties		# Employ	
Job Title 2		Duties		# Employ	
Job Title 3		Duties		# Employ	
Annual Average Enrollment #		Data not available.	Monthly Average Enrollment #		
Comments	Originally \$25/month for 3 summer months. Now \$50/month for 5 summer months.				

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.
When clients apply for LIHEAP we automatically apply whatever funds we have available to meet the need for reconnection or to prevent disconnection. Clients are not aware that they are applying for ECIP, Dollar More, Dollar Help, or whatever funds we have available. They just know whether we have been able to prevent the disconnection. When there are not enough combined funds to meet the minimum payment clients are notified of an additional payment that they need to make. They receive a detailed listing of the fund sources and dollar amount that were used to assist them.

Provider Question 3: STRENGTHS AND WEAKNESSES OF ASSISTANCE PROGRAMS
Based on experience and participant feedback, what are the STRENGTHS of this program?
<ul style="list-style-type: none"> \$50 credit helps seniors feel comfortable to use their air conditioning during the summer months because once enrolled they receive \$50 credit each month for 5 months over 2 years. Stabilizing impact because the seniors can count on the credit. Easy to enroll. If eligible for LIHEAP, eligible for Keeping Cool. Eligibility goes up to 250% of poverty. Can enroll at any time during the summer and will receive credits for the remaining months.
Based on experience and participant feedback, what are the WEAKNESSES of this program?
<ul style="list-style-type: none"> With the rate increases, \$50 does not provide the comfort level that seniors once felt.
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		Clean Slate			
Program Start Date	?	Program End Date	It has not been funded in the last 5 or 6 years.	Total # Employ	Same as LIHEAP
Job Title 1	All the same as LIHEAP	Duties		# Employ	
Job Title 2		Duties		# Employ	
Job Title 3		Duties		# Employ	
Annual Average Enrollment #		Data not available	Monthly Average Enrollment #		
Comments	Program gave clients the opportunity to start fresh with a \$0 balance. It did not encourage budgeting or regular bill payments. No current data available.				

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.
When clients apply for LIHEAP we automatically apply whatever funds we have available to meet the need for reconnection or to prevent disconnection. Clients are not aware that they are applying for ECIP, Dollar More, Dollar Help, or whatever funds we have available. They just know whether we have been able to prevent the disconnection. When there are not enough combined funds to meet the minimum payment clients are notified of an additional payment that they need to make. They receive a detailed listing of the fund sources and dollar amount that were used to assist them.

Provider Question 3: STRENGTHS AND WEAKNESSES OF ASSISTANCE PROGRAMS
Based on experience and participant feedback, what are the STRENGTHS of this program?
<ul style="list-style-type: none"> Opportunity to start fresh with a \$0 balance.
Based on experience and participant feedback, what are the WEAKNESSES of this program?
<ul style="list-style-type: none"> Did not encourage budgeting or payment.
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	
Spire		Dollar Help			
Program Start Date	1982	Program End Date		Total # Employ	Same as LIHEAP
Job Title 1	All the same as LIHEAP	Duties		# Employ	
Job Title 2		Duties		# Employ	
Job Title 3		Duties		# Employ	
Annual Average Enrollment #	270 in 2025	Monthly Average Enrollment #			
Comments	Number assisted based on funds available for our agency.				

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? <input checked="" type="checkbox"/> 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.
When clients apply for LIHEAP we automatically apply whatever funds we have available to meet the need for reconnection or to prevent disconnection. Clients are not aware that they are applying for ECIP, Dollar More, Dollar Help, or whatever funds we have available. They just know whether we have been able to prevent the disconnection. When there are not enough combined funds to meet the minimum payment clients are notified of an additional payment that they need to make. They receive a detailed listing of the fund sources and dollar amount that were used to assist them.

Provider Question 3: STRENGTHS AND WEAKNESSES OF ASSISTANCE PROGRAMS
Based on experience and participant feedback, what are the STRENGTHS of this program?
<ul style="list-style-type: none"> • Can be bundled to assist with reconnections or to prevent disconnections. • Easy application, if eligible for LIHEAP, eligible for Dollar Help. • Eligibility up to 300% poverty.
Based on experience and participant feedback, what are the WEAKNESSES of this program?
<ul style="list-style-type: none"> • Last resort for assistance when all other sources have been depleted. Must be off or have a disconnect. • Maximum assistance is \$1,000 but can only be used to pay the minimum amount due leaving the client with a balance still due. • Limited funding.
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	
Spire		Customer Charge Program			
Program Start Date	2026	Program End Date	current	Total # Employ	Same as LIHEAP
Job Title 1	All the same as LIHEAP	Duties		# Employ	
Job Title 2		Duties		# Employ	
Job Title 3		Duties		# Employ	
Annual Average Enrollment #		Data not available	Monthly Average Enrollment #		
Comments	We automatically enroll households eligible for LIHEAP that we make a pledge on their Spire bill when the service is on..				

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.
When clients apply for LIHEAP we automatically apply whatever funds we have available to meet the need for reconnection or to prevent disconnection. Clients are not aware that they are applying for ECIP, Dollar More, Dollar Help, or whatever funds we have available. They just know whether we have been able to prevent the disconnection. When there are not enough combined funds to meet the minimum payment clients are notified of an additional payment that they need to make. They receive a detailed listing of the fund sources and dollar amount that were used to assist them.

Provider Question 3: STRENGTHS AND WEAKNESSES OF ASSISTANCE PROGRAMS
Based on experience and participant feedback, what are the STRENGTHS of this program?
<ul style="list-style-type: none"> Monthly assistance that eligible clients can count on. We enroll our Spire LIHEAP clients automatically. For one year, \$22 is forgiven on every monthly bill. Easy enrollment. If eligible for LIHEAP, eligible for the Customer Charge Program. Provides some degree of stability with this monthly payment that can be counted on with no requirement from the client.
Based on experience and participant feedback, what are the WEAKNESSES of this program?
<ul style="list-style-type: none"> Not well known. Clients are uncertain how to apply for the program.
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	
Spire		Red Tag Program			
Program Start Date	?	Program End Date	current	Total # Employ	2
Job Title 1	Director Program Administration	Duties	Make referral to Spire for assistance based on LIHEAP application	# Employ	1
Job Title 2	Manager LIHEAP	Duties	Make referrals to Spire for assistance based on LIHEAP application	# Employ	1
Job Title 3		Duties		# Employ	
Annual Average Enrollment #		1 or 2/year	Monthly Average Enrollment #		
Comments	Referrals made to Red Tag when a furnace is out. This is coordinated with our Weatherization Program to make sure we are not duplicating service. Red Tag can be quicker than the Weatherization process if a simple repair is needed.				

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? <input checked="" type="checkbox"/> Yes <input 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.	
The Red Tag program is not used very often by the LIHEAP team, 1 or 2 times a year. It does not come up during our surveys since very few people know about or benefit from the program.	

Provider Question 3: STRENGTHS AND WEAKNESSES OF ASSISTANCE PROGRAMS	
Based on experience and participant feedback, what are the STRENGTHS of this program?	
<ul style="list-style-type: none"> It can be a quick and efficient resolution to repair a furnace. With a maximum allocation of \$2,000 it may not be enough to repair a furnace, and it is definitely not enough to replace a furnace. In these instances, we coordinate with our Weatherization program to cover the total costs. 	
Based on experience and participant feedback, what are the WEAKNESSES of this program?	
<ul style="list-style-type: none"> The maximum allocation is not enough to cover most repairs so customers must also apply for and be approved for Weatherization, which is a longer and more complicated application process. This program is not well known. 	
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 & Spire		Heat Up/Cool Down St. Louis			
Program Start Date	2000	Program End Date	current	Total # Employ	Same as LIHEAP
Job Title 1	All the same as LIHEAP	Duties		# Employ	
Job Title 2		Duties		# Employ	
Job Title 3		Duties		# Employ	
Annual Average Enrollment #		Varies depending on funds allocated to us		Monthly Average Enrollment #	
				Funding received one time a year during their annual Winterizing Event	
Comments					

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? <input checked="" type="checkbox"/> 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.
When clients apply for LIHEAP we automatically apply whatever funds we have available to meet the need for reconnection or to prevent disconnection. Clients are not aware that they are applying for ECIP, Dollar More, Dollar Help, or whatever funds we have available. They just know whether we have been able to prevent the disconnection. When there are not enough combined funds to meet the minimum payment clients are notified of an additional payment that they need to make. They receive a detailed listing of the fund sources and dollar amount that were used to assist them.

Provider Question 3: STRENGTHS AND WEAKNESSES OF ASSISTANCE PROGRAMS
Based on experience and participant feedback, what are the STRENGTHS of this program?
<ul style="list-style-type: none"> Valuable assistance to help with Ameren and Spire bills for those needing immediate help to prevent disconnection.
Based on experience and participant feedback, what are the WEAKNESSES of this program?
<ul style="list-style-type: none"> We never know until the last minute the amount of funding that is allocated to our agency. Referrals are made to our agency on the day of the event, and it is difficult to manage staffing and pledging with unknow dollars, unknow number of client referrals and a very short turnaround of a couple of days. Clients must be in the specific eligibility window on the day of the event 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	
Missouri American Water		Help to Others Program			
Program Start Date	2000?	Program End Date	current	Total # Employ	3
Job Title 1	Director Program Administration	Duties	Oversee budget and daily program operations	# Employ	1
Job Title 2	Program Administrative Assistant	Duties	Process and pledge applications when funding is available	# Employ	1
Job Title 3	Customer Service Representative	Duties	Process and pledge applications when funding is available	# Employ	1
Annual Average Enrollment #		1,668 in 2025	Monthly Average Enrollment #	200 when funds available	
Comments					

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.
The H2O program is small in comparison to LIHEAP and does not typically get mentioned in our surveys.

Provider Question 3: STRENGTHS AND WEAKNESSES OF ASSISTANCE PROGRAMS
Based on experience and participant feedback, what are the STRENGTHS of this program?
H2O Help to others provides assistance with a very basic need, water. The application process is simpler than LIHEAP. People apply throughout the year when they need assistance, so applications are spread out and manageable.
Based on experience and participant feedback, what are the WEAKNESSES of this program?
Since the program no longer provides a disconnect notice we are seeing an increase in applications for very low bills where the assistance may not be needed to prevent a disconnect. On the other hand, the majority of applicants need the entire maximum payment of \$250 to prevent disconnection. With the rate increases we are seeing higher bills and more applicants. Unfortunately, the current funding is not enough to meet the need, and we are forced to close the program until we receive our next quarterly allocation. This leaves months when there is no assistance available.
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 & Spire		Critical Medical Needs			
Program Start Date	?	Program End Date	current	Total # Employ	2
Job Title 1	LIHEAP Manager	Duties	Respond to referrals and process and pledge LIHEAP application for those eligible.	# Employ	1
Job Title 2	LIHEAP Team Lead	Duties	Respond to referrals and process and pledge LIHEAP application for those eligible	# Employ	1
Job Title 3		Duties		# Employ	
Annual Average Enrollment #				Monthly Average Enrollment #	
Comments	We receive referrals from the United Way of individuals with critical medical needs necessitating active utility accounts for health and wellbeing.				

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.	

Provider Question 3: STRENGTHS AND WEAKNESSES OF ASSISTANCE PROGRAMS	
Based on experience and participant feedback, what are the STRENGTHS of this program?	
<ul style="list-style-type: none"> The 30-day hold put on the account provides time for their LIHEAP application to be completed and pledged. Case managers assigned are a strength. They can facilitate the application process including gathering documents. Prioritizes individuals with serious mental and physical health conditions. If the client is off, the utilities reconnect them immediately. If not eligible for LIHEAP or other programs the Critical Medical Needs Program has funding available. 	
Based on experience and participant feedback, what are the WEAKNESSES of this program?	
<ul style="list-style-type: none"> Sometimes only a referral is made, and we cannot complete the process because we do not have an application on file. As the program grows Critical Medical Needs funding may be depleted. The application is completed by the medical staff case managers for the patient, but other household member information is not included. If the bills are not in the patient's name the LIHEAP application cannot be completed. 	
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	
Missouri Sewer District - MSD		Customer Assistance Program - CAP			
Program Start Date	?	Program End Date	current	Total # Employ	2
Job Title 1	LIHEAP Manager	Duties	Respond to request and release of information form from MSD staff housed in CAASTLC to provide verification of LIHEAP eligibility	# Employ	1
Job Title 2	LIHEAP Team Lead	Duties	Respond to request and release of information form from MSD staff housed in CAASTLC to provide verification of LIHEAP eligibility	# Employ	1
Job Title 3		Duties		# Employ	
Annual Average Enrollment #				Monthly Average Enrollment #	
Comments	CAASTLC staff do not process MSD CAP applications, but an MSD staff person is present in our office 3 days a week to accept and process their applications. When a client is eligible for LIHEAP they are automatically eligible for MSD's program and by signing a release of information form, we can provide verification of their income eligibly which makes the application process for MSD much simpler.				

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.

Provider Question 3: STRENGTHS AND WEAKNESSES OF ASSISTANCE PROGRAMS
Based on experience and participant feedback, what are the STRENGTHS of this program?
Simple application process for one time bill forgiveness for half of the total bill and monthly partial bill forgiveness for a year. Simple process with verification of LIHEAP eligibility. MSD staff located in our office makes accessibility to the program quick and easy.
Based on experience and participant feedback, what are the WEAKNESSES of this program?
The program is not well known.
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)?	I think most of the programs do not provide stability; they provide one-time crisis or repeated crisis relief. I believe that the inefficiency of the LIHEAP enrollment process requiring everyone to apply at the same time every year creates a crisis for many of our families. With no education regarding usage or incentive to control utility use, we are perpetuating a dependency on crisis funds as the solution to paying utility bills. Programs like Ameren’s Keeping Current, MSD’s CAP and Spires Customer Charge Program all provide monthly assistance which helps to stabilize the family and provides a better awareness of usage.
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.)?	Programs that keep a household out of repeated disconnection status are most effective at stabilizing households. Requiring a disconnect notice before assistance can be received causes constant stress and uncertainty for the household. Predictable monthly payments are only effective if they are affordable.
c. What customer categories (e.g., irregular income, medical debt, unbanked, etc.) are currently underserved or excluded by existing programs?	
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"> • The LIHEAP process of everyone having to reapply every year in October or November greatly reduces effectiveness. The number of applications received during October – January exceeds the capacity of agencies to process them in a timely manner. • Requiring the elderly and disabled on a fixed income to reapply every year reduces effectiveness. • The administrative allocation for LIHEAP does not allow agencies to hire the number of staff needed to process the applications at the beginning of the program year efficiently. • Households that are only eligible one time a year for assistance like the H2O program, are left vulnerable the majority of the year. • Lack of education on controlling utility usage encourages households to not think about it.
e. What specific modifications or alternative models (e.g., income-based caps or automatic enrollment) could close identified gaps?	<ul style="list-style-type: none"> • Automatic enrollment for those on a fixed income like the elderly and disabled would remove substantial stress and vulnerability. • Providing a one-time payment of an increased amount above the current allocated for EA and no crisis funds could encourage households to maintain a budget and control their utility usage.

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?	Vulnerable households prioritized, elderly, disabled, those with children under 5 and households with critical medical needs. Utility rates based on income.
b. What income thresholds, vulnerability indicators, or energy burden metrics to determine program eligibility?	

c. Would automatic or categorical enrollment be effective?
Yes for the elderly and disabled on a fixed income.
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?
The elderly and disabled do not become younger or in most instances no longer disabled. Random audits should substantiate the effectiveness of the auto enrollment. Running date of death reports as currently done for LIHEAP will be effective.
e. What program design elements can be included that prevent fraud, collecting duplicate benefits, or mismanagement while maintaining accessibility for eligible households?
<ul style="list-style-type: none"> • Running reports for household members being listed in more than one household. • Verifying employment in the state employment database. • Verifying current status of utilities in the utility portals to ensure the applicant account is still active at the listed address. • Running social security date of death reports • Verifying income through the state food stamp data

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)?
One application process like MSD’s CAP program. If the household is eligible for LIHEAP they are automatically eligible for MSD. The LIHEAP application calculates poverty level so programs with a higher income eligibility could still be screened through the LIHEAP application.
b. What program design elements would reduce administrative workload while maintaining accurate eligibility determinations?
Requiring applicants to submit a complete application or it is immediately denied while at the same time having sites for those needing assistance in completing the application correctly. LIHEAP must accept all applications and provide a list of missing documents to the applicant and give them 10 days to submit them. Trying to match submitted documents to the original application is time consuming and often impossible with varying last names for household members.
c. What strategies from other jurisdictions that have effectively reduced verification or recertification barriers?
<ul style="list-style-type: none"> • Requiring the elderly and disabled on fixed incomes to reapply every 3 years has been successfully implemented in other states. • Using annual tax filings to determine income eligibility and allocating a one-time benefit payment to the utility of the applicants choosing.

Stakeholder Question 4: METRICS AND EVALUATION
a. What metrics should be used to evaluate program performance, measure impacts, and assess cost-effectiveness?
The number of households receiving LIHEAP that are still disconnected at some point during the year. Is there a trend of the month households are disconnected? For instance, February or March due to maxing out winter crisis funds. Or August because summer crisis funds are maxed out. For gas, are households allowing their gas to be turned off in the summer to focus on keeping their electricity on and air conditioning then waiting for the winter crisis program to start so they can get their gas turned back on?
b. What metrics should be used to evaluate the effectiveness of marketing, education, and outreach efforts?
Tracking usage, for those participating in an education program. Has it decreased? For those receiving a monthly allocation, are they more likely to avoid disconnection?

c. What customer-experience metrics should be used to evaluate program accessibility, clarity, and ease of navigation, including the application, verification, and enrollment processes?
The number of applications that are complete when submitted. This is an indication that the process is easily understood and attainable.
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?
Tracking reduction in usage with corresponding temperatures factored in. Tracking reductions in terminations and disconnect notices.

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?
B31. How does the rate design element of fixed charges affect households with limited or no income flexibility?
The fixed charges would need to be realistic and affordable. Budget billing is a nice concept, but if the monthly bill amount is more than the customer can pay the household will be in constant disconnect status.
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?
Education and immediate incentives to enroll and practice would be needed to encourage people to enroll.

Stakeholder Question 6: EFFECTIVENESS AND REDUCING RELIANCE ON CRSIS 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.
As long as the LIHEAP crisis funds remain structured the way that they are, many households will not worry about following the new program guidelines because they will know they can always fall back on LIHEAP. We have created dependency on the crisis funds over the year. We have clients who have listed CAASTLC as their address so their bills come automatically to us so we can pay them.