



**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 13, 2026**

**Northeast Community Action Corporation**

**Mission Statement:** NECAC strives to make a difference by empowering people, changing lives and building strong communities.

**Vision Statement:** People will become empowered within their own communities to eliminate poverty so that all residents can achieve and enjoy economic independence. We are committed to building stronger communities by strengthening families. Our visualization is that all community members, including lower income people themselves, will take the responsibility and work together to alleviate the causes of poverty

<b>Organization: Northeast Community Action Corporation</b>
<b>Name: Dan Page</b>
<b>Title: President &amp; CEO</b>
<b>Date of Submission:</b>
<b>Provider? <input checked="" type="checkbox"/> Please complete both Part A and Part B</b>
<b>Stakeholder only? <input type="checkbox"/> Please complete only Part B</b>
<b>Programs Administered/Managed by your Organization (ALL utility related programs, including government funded programs such as LIHEAP and weatherization)</b>
<ol style="list-style-type: none"> <li>1. Liheap</li> <li>2. Dollar More</li> <li>3. Dollar Help</li> <li>4. Keeping Current</li> <li>5. Spire Waiver Program</li> <li>6. Liberty Funds</li> <li>7. MO American Water Funds</li> <li>8. Ameren Energy Funds</li> <li>9. Clean Slate-Gas only</li> </ol>

**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	
all		LIHEAP		MO DSS	
Program Start Date		Program End Date		Total # Employ	9
Job Title 1	LIHEAP SUPERVISOR	Duties	Oversee daily functions of EA dept and maintain quality control of work outputs	# Employ	1
Job Title 2	EMERGENCY SERVICES COORDINATOR	Duties	Pledge utility disconnect notices and maintain payment system	# Employ	2
Job Title 3	EA COUNSELOR	Duties	Processing applications for eligibility	# Employ	6
Annual Average Enrollment #	8000	Monthly Average Enrollment #	667		
Comments	Highest enrollment months are Oct-Dec, we take in 75% of all applications for the year in those 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? <b>Yes</b> <input type="checkbox"/> <b>No</b> <input type="checkbox"/> ...with state agencies? <input type="checkbox"/> <b>Yes</b> <input type="checkbox"/> <b>No</b>
If you conduct surveys or other evaluations, please explain the process you use.
We do not have specific surveys for each program we administer, we only have a general agency survey.

<b>Provider Question 3: STRENGTHS AND WEAKNESSES OF ASSISTANCE PROGRAMS</b>
Based on experience and participant feedback, what are the <b>STRENGTHS</b> of this program?
It can help fixed income households reduce the percentage of income spent on utilities for the year.
Based on experience and participant feedback, what are the <b>WEAKNESSES</b> of this program?
Clients with higher bills max out of funds quickly, especially in summer
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		Program End Date		Total # Employ	1
Job Title 1	Emergency Services Coordinator	Duties	Pledge utility disconnect notices and maintain payment system	# Employ	1
Job Title 2		Duties		# Employ	
Job Title 3		Duties		# Employ	
Annual Average Enrollment #		150	Monthly Average Enrollment #	13	
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? <b>Yes</b> <input type="checkbox"/> <b>No</b> <input type="checkbox"/> ...with state agencies?	<input type="checkbox"/> Yes <input type="checkbox"/> No
If you conduct surveys or other evaluations, please explain the process you use.	
We do not have specific surveys for each program we administer, we only have a general agency survey.	

Provider Question 3: STRENGTHS AND WEAKNESSES OF ASSISTANCE PROGRAMS
Based on experience and participant feedback, what are the <b>STRENGTHS</b> of this program?
Used as leveraging when client was out of liheap funds, helped fill gaps
Based on experience and participant feedback, what are the <b>WEAKNESSES</b> of this program?
Max amount is \$600 which sometimes does not cover the need/no admin funds to cover employee time worked with this 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		Dollar Help			
Program Start Date		Program End Date		Total # Employ	1
Job Title 1	Emergency Services Coordinator	Duties	Pledge utility disconnect notices and maintain payment system	# Employ	1
Job Title 2		Duties		# Employ	
Job Title 3		Duties		# Employ	
Annual Average Enrollment #	20	Monthly Average Enrollment #	2		
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? <b>Yes</b> <input type="checkbox"/> <b>No</b> <input type="checkbox"/> ...with state agencies?	<input type="checkbox"/> Yes <input type="checkbox"/> No
If you conduct surveys or other evaluations, please explain the process you use.	
We do not have specific surveys for each program we administer, we only have a general agency survey.	

Provider Question 3: STRENGTHS AND WEAKNESSES OF ASSISTANCE PROGRAMS
Based on experience and participant feedback, what are the <b>STRENGTHS</b> of this program?
Can help fill the gap when other funding is not enough
Based on experience and participant feedback, what are the <b>WEAKNESSES</b> of this program?
Only available during winter months, some clients need it in the summer to help with hot water and cooking needs
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	10/2010	Program End Date	2025 on hold	Total # Employ	1
Job Title 1	Emergency Services Coordinator	Duties	Pledge utility disconnect notices and maintain payment system	# Employ	1
Job Title 2		Duties		# Employ	
Job Title 3		Duties		# Employ	
Annual Average Enrollment #		180	Monthly Average Enrollment #	15	
Comments	Program has not had any funding for about a year.				

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? <b>Yes</b> <input type="checkbox"/> <b>No</b> <input type="checkbox"/> ...with state agencies?	<input type="checkbox"/> Yes <input type="checkbox"/> No
If you conduct surveys or other evaluations, please explain the process you use.	
We do not have specific surveys for each program we administer, we only have a general agency survey.	

Provider Question 3: STRENGTHS AND WEAKNESSES OF ASSISTANCE PROGRAMS	
Based on experience and participant feedback, what are the <b>STRENGTHS</b> of this program?	
Helps client maintain level bills and offers forgiveness of debt, also gives them a credit	
Based on experience and participant feedback, what are the <b>WEAKNESSES</b> of this program?	
Currently-lack of money	
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		Spire Waiver Program			
Program Start Date	2025	Program End Date		Total # Employ	1
Job Title 1	Emergency Services Coordinator	Duties	Pledge utility disconnect notices and maintain payment system	# Employ	1
Job Title 2		Duties		# Employ	
Job Title 3		Duties		# Employ	
Annual Average Enrollment #				Monthly Average Enrollment #	
Comments					

Provider Question 2: EVALUATION FOR EFFECTIVENESS	
Do you conduct surveys to gauge effectiveness of this utility assistance program?	<input type="checkbox"/> Yes <input 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? <b>Yes</b> <input type="checkbox"/> <b>No</b> <input type="checkbox"/> ...with state agencies?	<input type="checkbox"/> Yes <input type="checkbox"/> No
If you conduct surveys or other evaluations, please explain the process you use.	
We do not have specific surveys for each program we administer, we only have a general agency survey.	

Provider Question 3: STRENGTHS AND WEAKNESSES OF ASSISTANCE PROGRAMS
Based on experience and participant feedback, what are the <b>STRENGTHS</b> of this program?
No work on the side of the client to be enrolled, offers a credit every month
Based on experience and participant feedback, what are the <b>WEAKNESSES</b> of this program?
none
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	
Liberty		Liberty Funds			
Program Start Date		Program End Date		Total # Employ	1
Job Title 1	Emergency Services Coordinator	Duties	Pledge utility disconnect notices and maintain payment system	# Employ	1
Job Title 2		Duties		# Employ	
Job Title 3		Duties		# Employ	
Annual Average Enrollment #		11	Monthly Average Enrollment #	1	
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? <b>Yes</b> <input type="checkbox"/> <b>No</b> <input type="checkbox"/> ...with state agencies?	<input type="checkbox"/> Yes <input type="checkbox"/> No
If you conduct surveys or other evaluations, please explain the process you use.	
We do not have specific surveys for each program we administer, we only have a general agency survey.	

Provider Question 3: STRENGTHS AND WEAKNESSES OF ASSISTANCE PROGRAMS
Based on experience and participant feedback, what are the <b>STRENGTHS</b> of this program?
Based on experience and participant feedback, what are the <b>WEAKNESSES</b> of this 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	
MO American Water		MO American Water			
Program Start Date		Program End Date		Total # Employ	1
Job Title 1	Emergency Services Coordinator	Duties	Pledge utility disconnect notices and maintain payment system	# Employ	1
Job Title 2		Duties		# Employ	
Job Title 3		Duties		# Employ	
Annual Average Enrollment #		25	Monthly Average Enrollment #	3	
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? <b>Yes</b> <input type="checkbox"/> <b>No</b> <input type="checkbox"/> ...with state agencies?	<input type="checkbox"/> Yes <input type="checkbox"/> No
If you conduct surveys or other evaluations, please explain the process you use.	

Provider Question 3: STRENGTHS AND WEAKNESSES OF ASSISTANCE PROGRAMS
Based on experience and participant feedback, what are the <b>STRENGTHS</b> of this program?
Based on experience and participant feedback, what are the <b>WEAKNESSES</b> of this 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	
Ameren		Ameren Energy Funds			
Program Start Date	8/2025	Program End Date		Total # Employ	1
Job Title 1	Emergency Services Coordinator	Duties	Pledge utility disconnect notices and maintain payment system	# Employ	1
Job Title 2		Duties		# Employ	
Job Title 3		Duties		# Employ	
Annual Average Enrollment #	335 to date	Monthly Average Enrollment #	40		
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? <b>Yes</b> <input type="checkbox"/> <b>No</b> <input type="checkbox"/> ...with state agencies?	<input type="checkbox"/> Yes <input type="checkbox"/> No
If you conduct surveys or other evaluations, please explain the process you use.	

Provider Question 3: STRENGTHS AND WEAKNESSES OF ASSISTANCE PROGRAMS
Based on experience and participant feedback, what are the <b>STRENGTHS</b> of this program?
Can be paid without a disconnect, just have to have a balance above 150
Based on experience and participant feedback, what are the <b>WEAKNESSES</b> of this program?
150 usually will not cover a months' worth of service, if in disc threat other programs are needed, creating more admin expense
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 State-Gas only			
Program Start Date		Program End Date		Total # Employ	1
Job Title 1	Emergency Services Coordinator	Duties	Pledge utility disconnect notices and maintain payment system	# Employ	1
Job Title 2		Duties		# Employ	
Job Title 3		Duties		# Employ	
Annual Average Enrollment #		50	Monthly Average Enrollment #		5
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? <b>Yes</b> <input type="checkbox"/> <b>No</b> <input type="checkbox"/> ...with state agencies? <input type="checkbox"/> <b>Yes</b> <input type="checkbox"/> <b>No</b>	
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 <b>STRENGTHS</b> of this program?
Can help clear up a huge gas bill at once-clears the whole gas balance
Based on experience and participant feedback, what are the <b>WEAKNESSES</b> of this program?
Only helps with gas, most times it is the electric portion that is the highest amount for 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 <b>existing programs</b> help improve long-term household stability versus one-time crisis relief (i.e. reduce repeat disconnects)?	We have no way to measure the stability, the only program that showed some we have not had funding for in the last year, which is keeping current.
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.)?	Set monthly payments, arrearage reduction
c. What customer categories (e.g., irregular income, medical debt, unbanked, etc.) are currently underserved or excluded by existing programs?	Irregular/season income and other large debts such as medical
d. What aspects of existing programs limit or reduce effectiveness (e.g., funding caps, restrictive eligibility windows, administrative barriers, etc.)?	Enough funding available when needs are higher with hot summers and cold winters, administrative barriers due to no funding for the agency to process this extra work for their clients.
e. What specific modifications or alternative models (e.g., income-based caps or automatic enrollment) could close identified gaps? Auto enrolled based on being qualified for one program, no more documentation needed to grant them funds from another program	Auto enroll by systems communicating with each other, staff do not have to enroll them into each separate portal

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?	Poverty level, cost of administrative duties to administer program/when resources are limited it would have to be first come first served as there is not way to determine who will need help today vs next week, cannot hold funds because we think someone with less income may show up next week
b. What income thresholds, vulnerability indicators, or energy burden metrics to determine program eligibility?	Federal poverty level, percentage of income spent on energy vs housing cost
c. Would automatic or categorical enrollment be effective?	Only if it was able to be changed in case of dramatic income changes in household
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?	Random audits
e. What program design elements can be included that prevent fraud, collecting duplicate benefits, or mismanagement while maintaining accessibility for eligible households?	Systems need to be able to identify duplicate addresses so that multiple people in a household are not receiving the benefit-maybe limit it to only the account holder can receive a benefit

<b>Stakeholder Question 3: CHALLENGES OF ADMINISTRATIVE BURDEN</b>	
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)?	Easy online applications, one stop shop-can apply for all programs at once, don't need to bring documents in each time
b. What program design elements would reduce administrative workload while maintaining accurate eligibility determinations?	If approved for liheap automatically approved for the others, no documentation needed to be brought back each time they need assistance from another program
c. What strategies from other jurisdictions that have effectively reduced verification or recertification barriers?	Liheap system uses SS benefits request that can give us the clients benefit amount-takes 3 days, using income from snap if snap eligible

<b>Stakeholder Question 4: METRICS AND EVALUATION</b>	
a. What metrics should be used to evaluate program performance, measure impacts, and assess cost-effectiveness?	Year to year usage and percentage of returning clients
b. What metrics should be used to evaluate the effectiveness of marketing, education, and outreach efforts?	Comparing outreach numbers to participation rates.
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 clients serviced compared to those denied, especially those denied for failure to properly apply.
d. What metrics should be used to evaluate whether verification requirements are appropriately calibrated to risk?	A revamp of the guidebook is in order. It has become so strict that most do not attain goals.
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?	Would have to be some kind of data follow up method, maybe utility companies can follow client for 6 months and report if they had anymore late payments/disconnect notices issued

<b>Stakeholder Question 5: RATE STRUCTURES AND ASSISTANCE SUCCESS</b>	
a. Is there a relationship between utility rate structures and the success of assistance programs? If so, what is that relationship?	Unsure-there is no way for us as an agency to evaluate this
B31. How does the rate design element of <b>fixed charges</b> affect households with limited or no income flexibility?	They can try to budget better because they know the fixed rate-no sudden increases
b2. How does the rate design element of <b>seasonal usage and rates</b> affect households with limited or no income flexibility?	Helps reduce bills possible but only for a short time, as an agency we have no way to get data on this
b3. How does the rate design element of <b>time-variant pricing</b> affect households with limited or no income flexibility?	They can try to plan to use less when rates are at the highest due to peaks and seasons.

<b>Stakeholder Question 6: EFFECTIVENESS AND REDUCING RELIANCE ON CRSIS ASSISTANCE</b>
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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)

Debt forgiveness, credits for on time payments, budget billing, eliminated the previous debt all together

**Stakeholder Question 7: IMPLEMENTATION CHALLENGES**

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

Criteria on eligibility, enough funding for it to be administered effectively, ways to measure effectiveness of program