Utility Assistance Programs Virtual Workshop

June 30, 2026

Agenda

- Welcome and Introduction
- Fireside Chat on Utility Assistance: The Administrators Perspective
- Universal Screening, Eligibility, and Application Presentation
- Analyzing Utility Burden Presentation
- Presentation from RMI: Targeted Customer Affordability Program Design and Implementation Challenges
- Takeaways from the Critical Medical Needs Program Evaluation Report
- Communication and its Role in Utility Assistance
- Closing

Welcome and Introduction

Rich Germinder – MO PSC

Geoff Marke – MO OPC

Utility Assistance Programs Workshop: Why Are We Here?

- Senate Bill 4: Section 393.1680 RSMo
  - “1. Notwithstanding any other provision of law to the contrary, the commission may approve a special alternative residential customer rate or bill discount from a utility company, as defined in section 393.550, based in part on household utility burden. The rate or bill discount approved shall incorporate a commission-authorized rate or bill discount from the appropriate base residential rate. For purposes of this subsection, "utility burden" means the percentage of income paid by a customer to a utility company for the cost of electricity, natural gas, or water service. Any eligibility verification needed to implement the new alternative rate shall be done by an independent third party or parties selected by a process established by the commission that includes input from the utility company and the office of the public counsel…”
- MO PSC Established a Utility Assistance Programs Docket: OW-2026-0085

Missouri PSC Public Service Commission

Utility Assistance Programs Docket and Workshop

In the Matter of a Working Case for Commission Review and Consideration of Utility Assistance Programs and Special Alternative Residential Customer Rates)))))

Case No. OW-2026-0085

ORDER OPENING WORKING CASE AND DIRECTING RESPONSES

Issued: October 1, 2025 Effective: October 1, 2025

The Commission will open this working case to review currently existing utility affordability programs and will direct regulated utilities to provide information on these programs. As part of this working case, representatives from the Commission, the Office of the Public Counsel, and any other interested stakeholders will have the opportunity to review the currently existing utility affordability programs designed for low-income and senior residential customers and may work to make recommendations or engage in further dialogue regarding the following:

(1) Efficiencies or changes to current programs and the consideration of additional programs designed to address the affordability of utility rates for low-income and senior residential customers;
(2) Establishing uniformity and simplification of programs;
(3) Special alternative residential customer rates or bill discounts contemplated by Section 393.1680, RSMo, as a result of SB4[1]; and
(4) Community outreach and customer education.

- Established a repository for data and comments from regulated utilities and stakeholders
- Regulated utilities compiled requested data on customer assistance programs and filed it in the docket
- Engaged in dialogue with utilities and stakeholders

Missouri PSC Public Service Commission

Utility Assistance Programs Workshop: Why Are We Here?

- A myriad of programs with unique eligibility criteria, enrollment requirements, and budgets
- A patchwork approach to improvement over the years
- Customers Challenges
  - Don’t know where to go for help
  - Role of the disconnection notice in LIHEAP and other programs
  - Utility literacy
    - 4 in 5 customers feel powerless over utility bills – Powerlines 2025 Review and Polling
    - Americans age 18-34 (60%), 35-49 (58%), 50-64 (58%) are more likely to say they don’t fully understand what drives these costs compared to those ages 65+ (47%)
- Resources are being left on the table and not reaching customers
- We want to do things better!

Missouri PSC Public Service Commission

Commission's Jurisdiction and Authority

Jurisdiction and Authority

1. Utility Assistance Programs offered by regulated Investor-Owned Utilities

NO Jurisdiction or Authority

1. Rural Electric Cooperatives, Municipal Utilities, Special Utility Districts – water or sewer
   - Any programs offered
2. Federal programs or programs administered by other agencies, such as:
   - Low Income Home Energy Assistance Program - LIHEAP
   - Weatherization Assistance Program – Missouri DNR and Federal DOE

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Fireside Chat on Utility Assistance: The Administrators Perspective

Johna Trapani, Moderator – Senior Research and Data Analyst, Customer Experience Department, MO PSC
Georgie Donahue – Director of Program Administration, Community Action Agency of St. Louis County
Jamie Oberly – Chief Community Services Officer, West Central Missouri Community Action Agency

Missouri PSC Public Service Commission

Break

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Missouri PSC Public Service Commission

Universal Screening, Eligibility, and Application Presentation

Todd Jordan, PhD – Vice President, Community Impact, United Way of Greater Kansas City

UNITED WAY
Greater Kansas City

Toward a Universal Screening & Eligibility Platform for Utility & Public Benefits in Missouri

Todd Jordan, PhD

June 30, 2026

This is Bigger than Utility Assistance

Asset Limited, Income Constrained, Employed (ALICE)

Gap between Federal Poverty Level (FPL) and threshold for a survival budget

Financial stress driven by: Housing, Childcare, Healthcare, Income volatility

Implication for system design:
People don’t have *one problem*

They are navigating **multiple systems simultaneously**

1 in 3

Number of Missouri households who don’t make enough to survive

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Greater Kansas City

What is Driving the Call for Help

Insights from United for Helping Our Neighbors Statewide (UHONS)

Primary drivers of crisis: Employment Disruption, Health & Medical Issues, Household Instability, Unexpected Expenses, Childcare Barriers

A striking theme across cases: One disruption → multiple system failures → rapid instability

Example typical pathway: Job loss or illness > Loss/reduction of income > Fall behind on rent/utilities > Limited access to benefits or delays > Risk of eviction or shutoff

Core message: Most households are not in long-term chronic crisis—they are experiencing **acute shocks that cascade quickly.** Intervention, at the right at moment, prevents escalation.

Why This Matters Now

Core message: demand is high, systems are fragmented, opportunity is real

Utility assistance demand continues to rise (cost pressure, seasonal volatility)

Multiple funding streams across:

- LIHEAP (federal/state)
- Utility programs (Evergy, Spire, Ameren, MO American Water)
- United Way / nonprofit programs / private funds

Current system = fragmented

- Separate applications
- Different eligibility rules
- Limited coordination

The Problem We're Solving

For residents

"What do I qualify for?" is unclear
Multiple applications, repeated documentation
Timing matters → wrong program first can reduce total support

For providers

No shared visibility into what clients already received
Conflicting rules between programs
High administrative burden

For the system

Under-enrollment in some programs, overload in others
No coordinated prioritization of funds

Example Fragmentation (Use Case)

Resident:
Facing shutoff
Applies for LIHEAP → waiting 30 days, AND/OR
Applies to multiple emergency assistance programs for immediate help

Resident outcome:
Maybe resolves crisis with combination of utility/agency/self-resolve assistance, OR
Maybe the crisis is not resolved in time, AND
Unlikely to see enrollment across programs and no longer-term stabilizing effort

System outcome: less total assistance, more churn, more cost

What’s Missing: The Layer Between Referral and Results

Today’s system:
Information & referral (211, websites)
Program-specific applications
Case management (limited, program-based)

The gap:
People are left to **navigate multiple systems on their own**

Bottom line:
We are good at telling people where to go—
We are not structured to help them actually get through multiple systems

Utility Assistance Is the Entry Point—Not the Solution

Content:
Most households aren't facing a single crisis
They are managing: Housing costs, Childcare, Healthcare, Income Volatility

Example:
Utility crisis resolved ✅
Rent instability continues ❌
Childcare cost remains ❌

Result: Household cycles back into crisis

Bottom line:
Without navigation across systems, utility assistance alone cannot stabilize households

Conceptual Clarity

Function	What it Does	Example
Screening	Suggests likely eligibility	“You may qualify for LIHEAP + CMN”
Application Assistance	Helps complete forms/gather documents	Dedicated staff or AI agent (with staff backup)
Eligibility Determination	Official decision	“You are eligible for LIHEAP” or “As a SNAP recipient you are eligible for XYZ utility program”
Enrollment	Benefit is activated	Payment sent to utility

What “Universal” Could Mean

Level 1: Basic Screener

Identifies likely programs
Refers to partners
**All levels benefit from (or depend on) effective navigation

Level 2: Coordinated Intake

One intake → many applications
Shared documentation

Level 3: Eligibility Engine

Rules-based determination across programs

Level 4: Integrated Enrollment

Automatic or near-real-time approval + benefit delivery

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Greater Kansas City

Opportunity #1: Start with Utility Ecosystem

Why start here

Shared goal: prevent disconnections

Programs already overlapping:

- LIHEAP
- Utility hardship programs
- CMN

Strong existing partnerships (Example: United Way + utilities)

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Greater Kansas City

Opportunity #2: Public Benefit Eligibility

Very important concept
SNAP, Medicaid, WIC already determine income eligibility
Example: WIC automatically accepts SNAP participants

Concept:
If someone is eligible for SNAP or Medicaid →
they should be **pre-qualified** for utility assistance

Potential:
Reduce verification burden
Speed access
Increase equity

The Big Challenge: Tech Can't Solve it All

Policy & rules

Different eligibility thresholds

Conflicting benefit logic

Funding restrictions

Data sharing

Privacy constraints (health, income)

No shared client record

Different Platforms

Governance

State vs utilities vs nonprofits

Who owns decisions?

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Design Choice: Two Paths Forward

Path A: Incremental / Partnership-Based
Shared screener
Referral + coordination
Partial data sharing

Path B: Transformational / Integrated System
Shared eligibility logic
Cross-program approvals
Unified case record

What Incremental Looks Like (Pilot)

Core components:

Universal screening tool
Common intake form
Program matching logic
Care navigation (light touch support across multiple programs)
1-2 year pilot

Enhancements:

Document vault (upload once)
Basic data-sharing agreements
Referral tracking

Outcomes:

Reduced client confusion
Faster routing to programs
Better coordination between partners

What Transformational Looks Like

Integrated Eligibility Layer

Rules engine across programs

Shared data model

Automatic Qualification

SNAP → utility programs

Medicaid → CMN eligibility for expanded program

Real-Time Decisions

Instant eligibility where possible

Unified Case Management

One household record across systems

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Greater Kansas City

Key Decisions Ahead

How far do we want to go?

What are we willing to standardize?

Where do we allow variation?

Who leads and funds this effort?

What role should care navigation play in this system?

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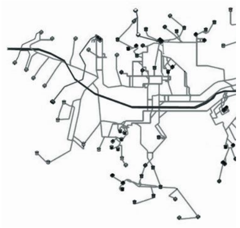
Analyzing Utility Burden Presentation

Hassan Shaban, PhD – Principal, Empower Dataworks

Analyzing Energy Burden in Missouri

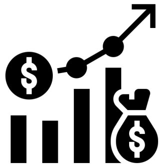
empower dataworks

What is an Energy Burden Assessment?



Data analysis (not a survey) that uses utility and third-party customer data.

Primary purpose is to estimate the energy assistance need based on household-level geographic, demographic and building data.

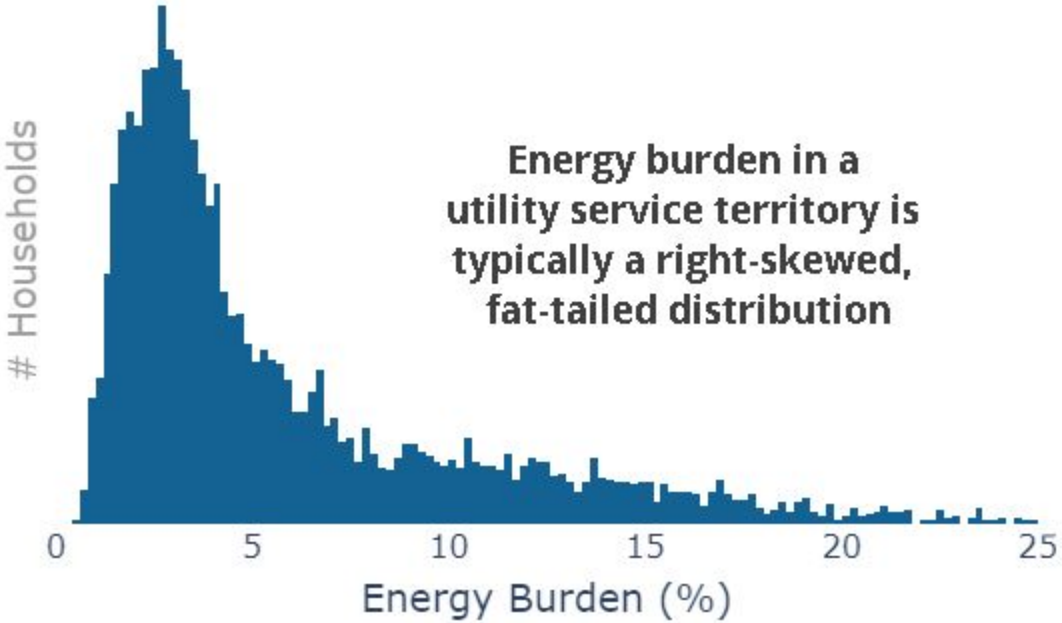


Comparing the need to actual program performance gives us an **actionable** path to improving our energy assistance programs

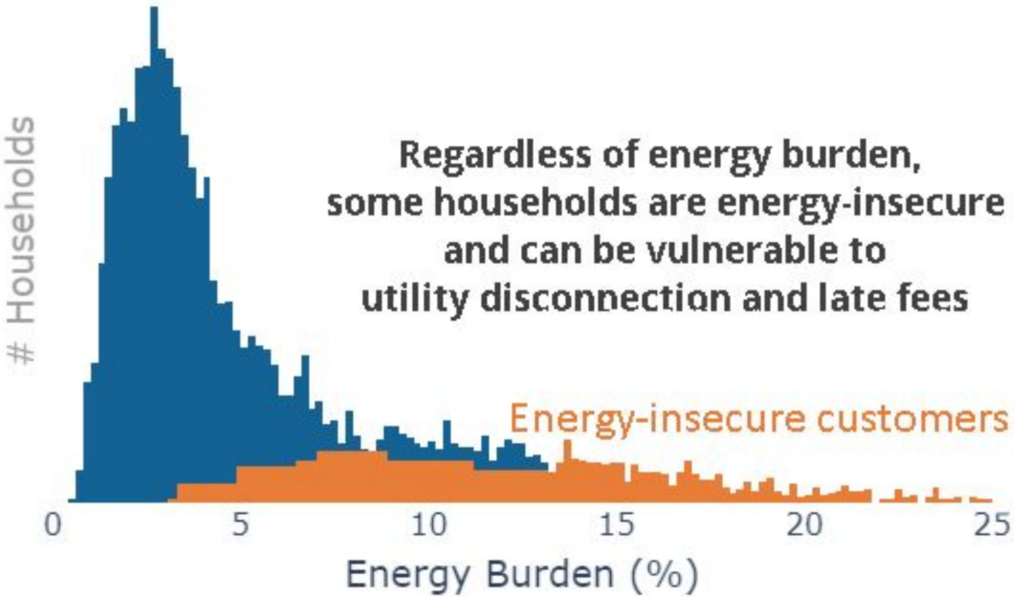
Energy Burden

The primary metric of success is reduction in energy insecurity

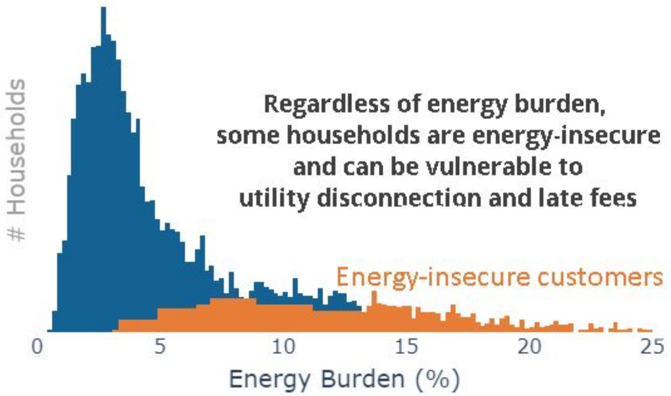
Energy Burden is a Distribution

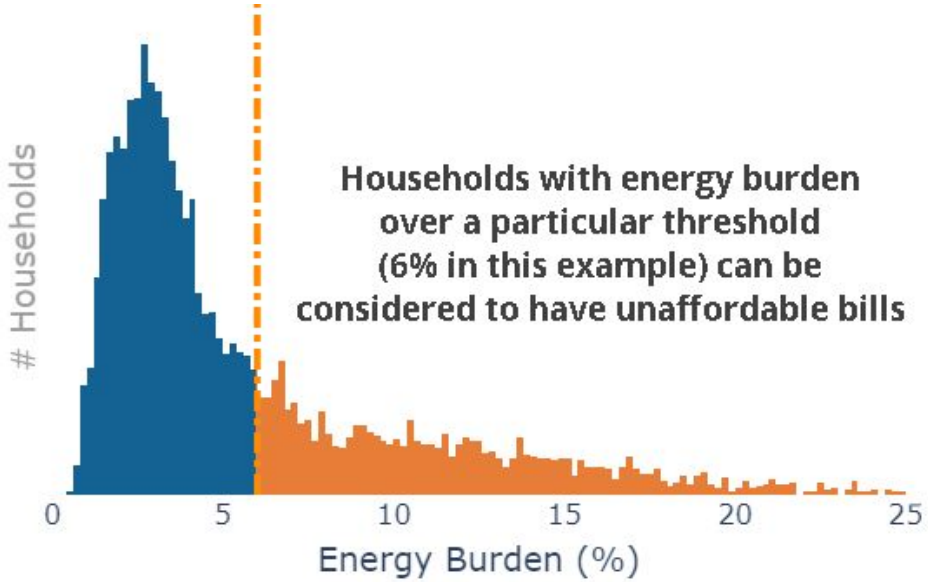


Energy Insecurity is Harder to Measure



Energy Burden is a Proxy for Energy Insecurity





6% threshold is a rule of thumb based on recommendations by Fisher, Sheehan & Colton

Energy Burden across Missouri

High Burden Households (2018)

~20-25% of customers

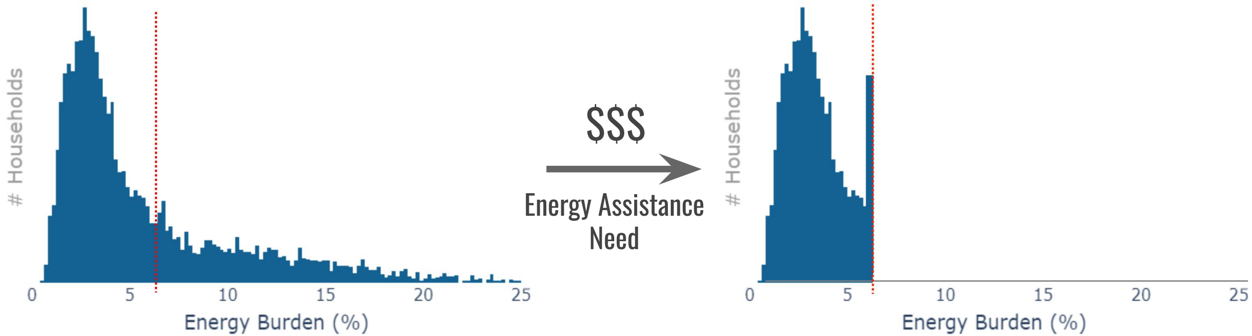
Energy Assistance Need (2018)

~750 M

16th highest state per-capita

LIHEAP Funding (2026)

~92 M



Generally, states with mature utility energy assistance programs/rates have total assistance funding that is equal to 40-60% of the energy assistance need.

Note: Estimates are outdated and intended to show the order of magnitude.

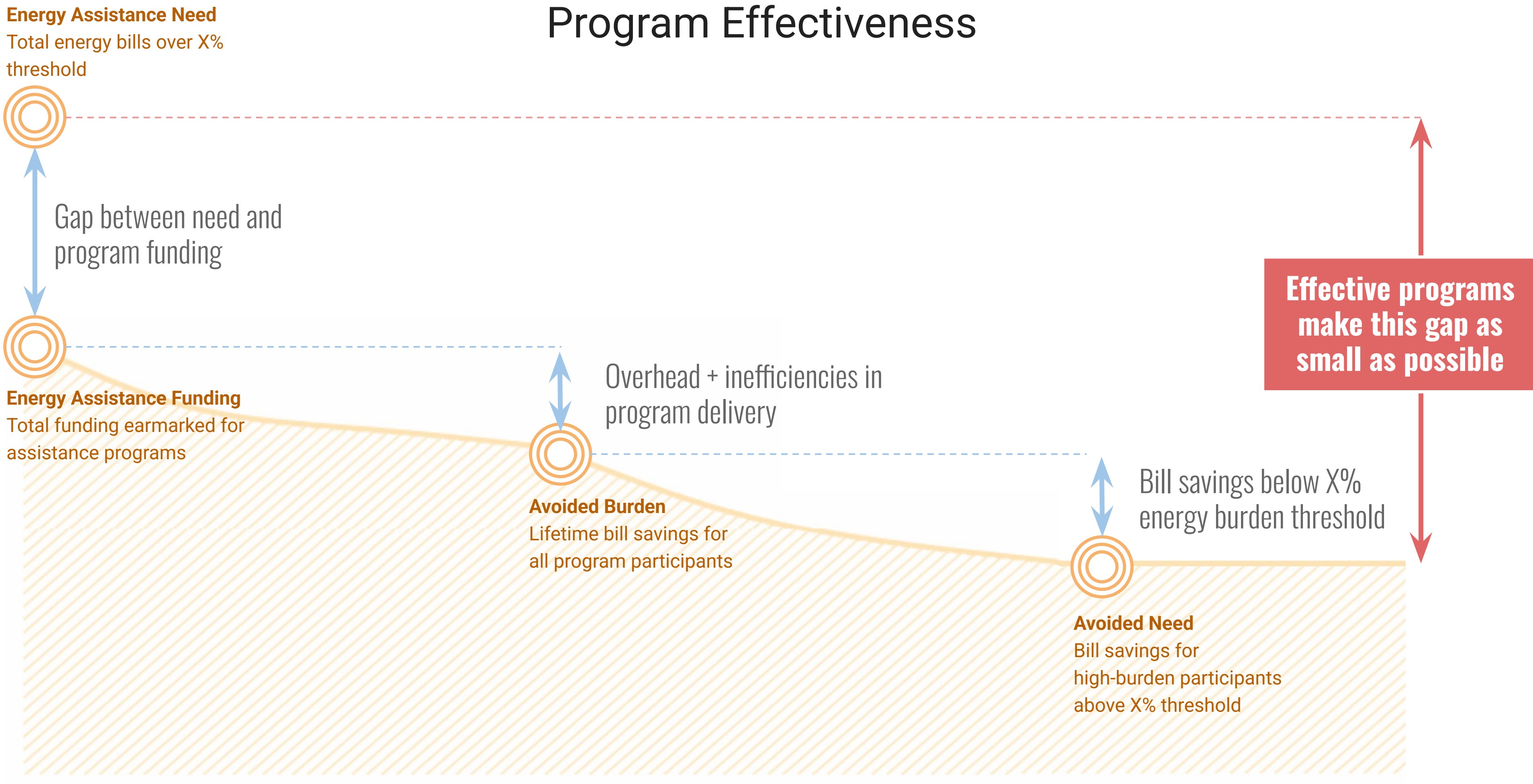
Should utilities offer energy assistance programs?

Cost-effective Energy Assistance

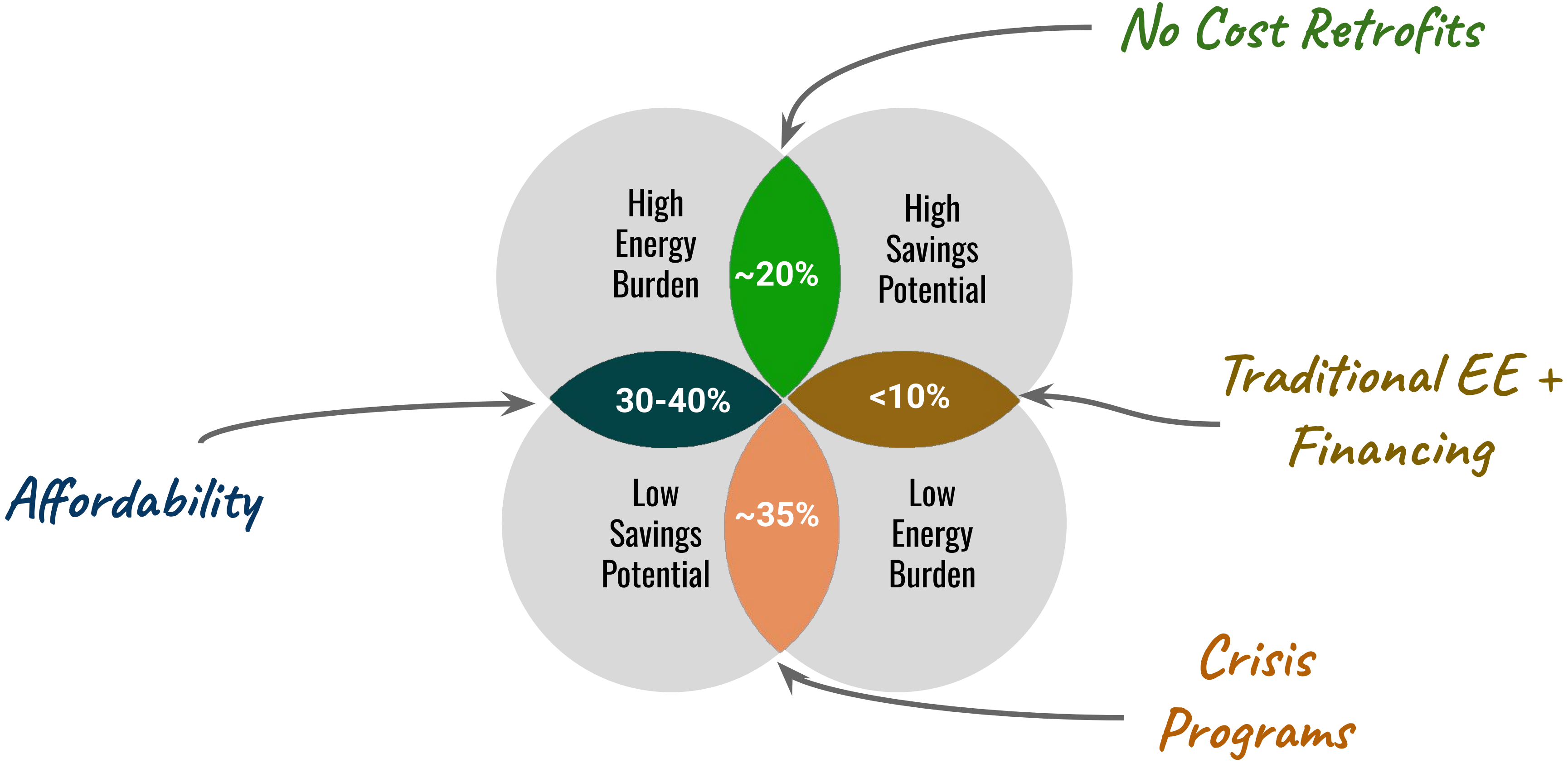
$$\textbf{Utility Assistance Cost Test} = \frac{\begin{array}{c}\text{Fewer Customer Calls (customer service staffing)}\\ \text{+ Avoided Disconnection/Reconnection Costs}\\ \text{+ Lower Collection Costs}\\ \text{+ Reduced Arrearage Carrying Cost}\\ \text{+ Reduced Debt Write-offs}\end{array}}{\begin{array}{c}\text{Utility Direct Program Costs}\\ \text{+Administrative Expenses}\end{array}} = \mathbf{0.5\text{-}1.5}$$

Plus other “soft” benefits like higher customer satisfaction, societal benefits

Program Effectiveness



Program Potential



Note: Rough estimates. Every utility and region has a different customer breakdown

Utility Overviews

Spire Missouri **Energy Burden**

Energy Assistance Need

$155M

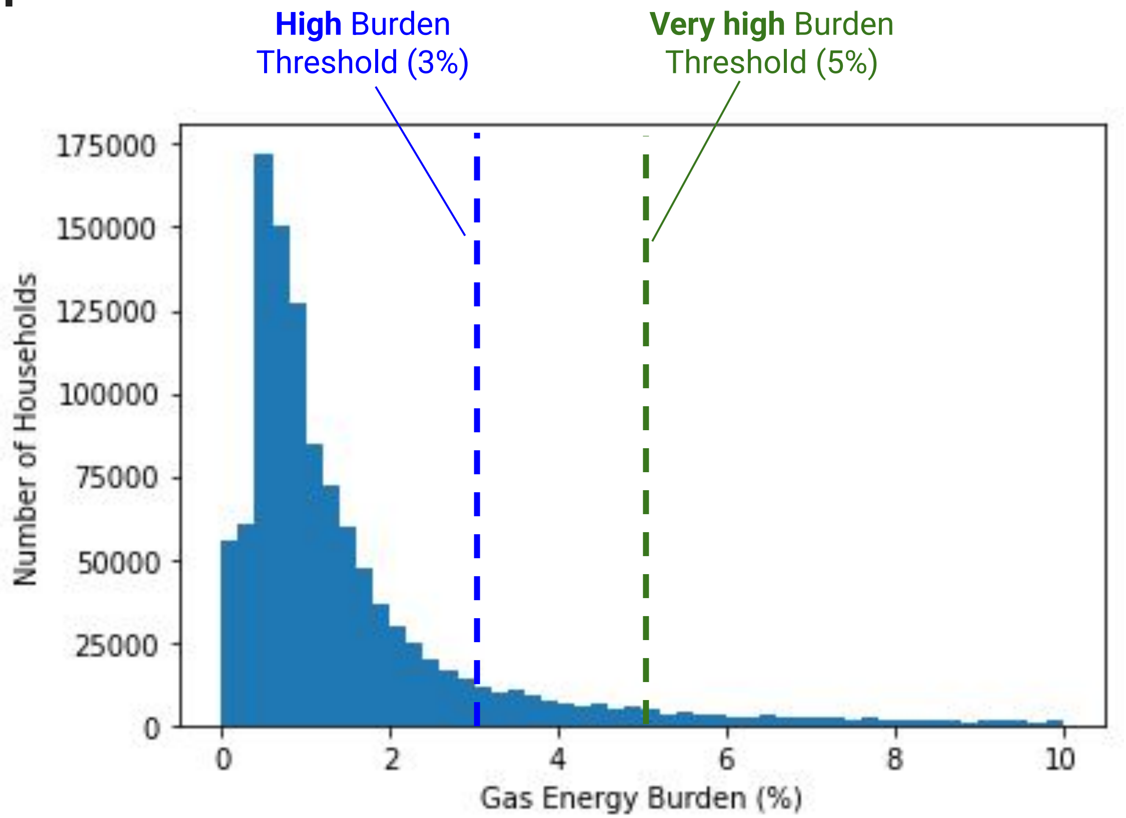
Low Income Households

Under 150% FPL: **~190k (~16% of customers)**

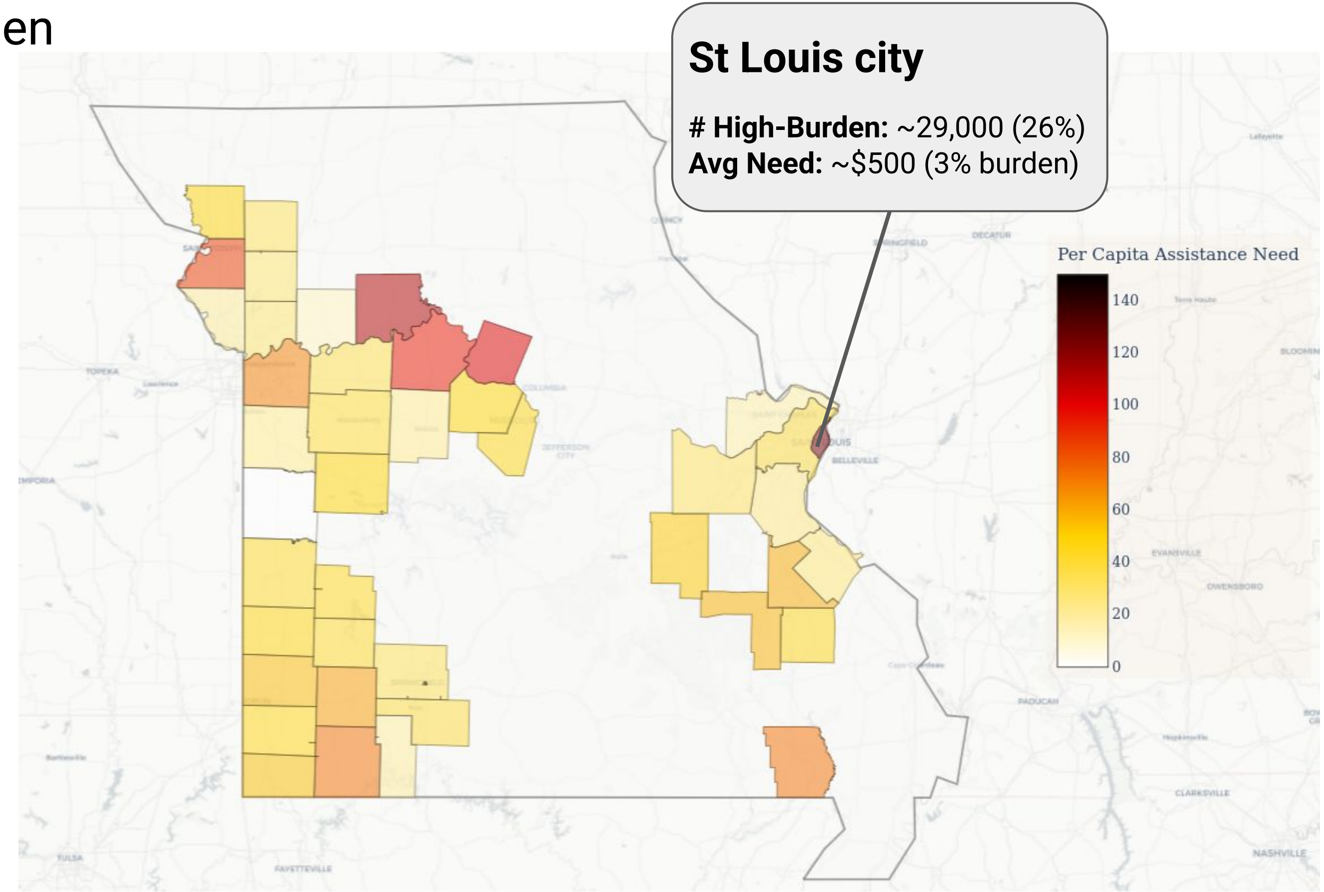
Gas Burden
All Customers: **~1.8%**
Low-Income: **4.6%**

High Burden Households

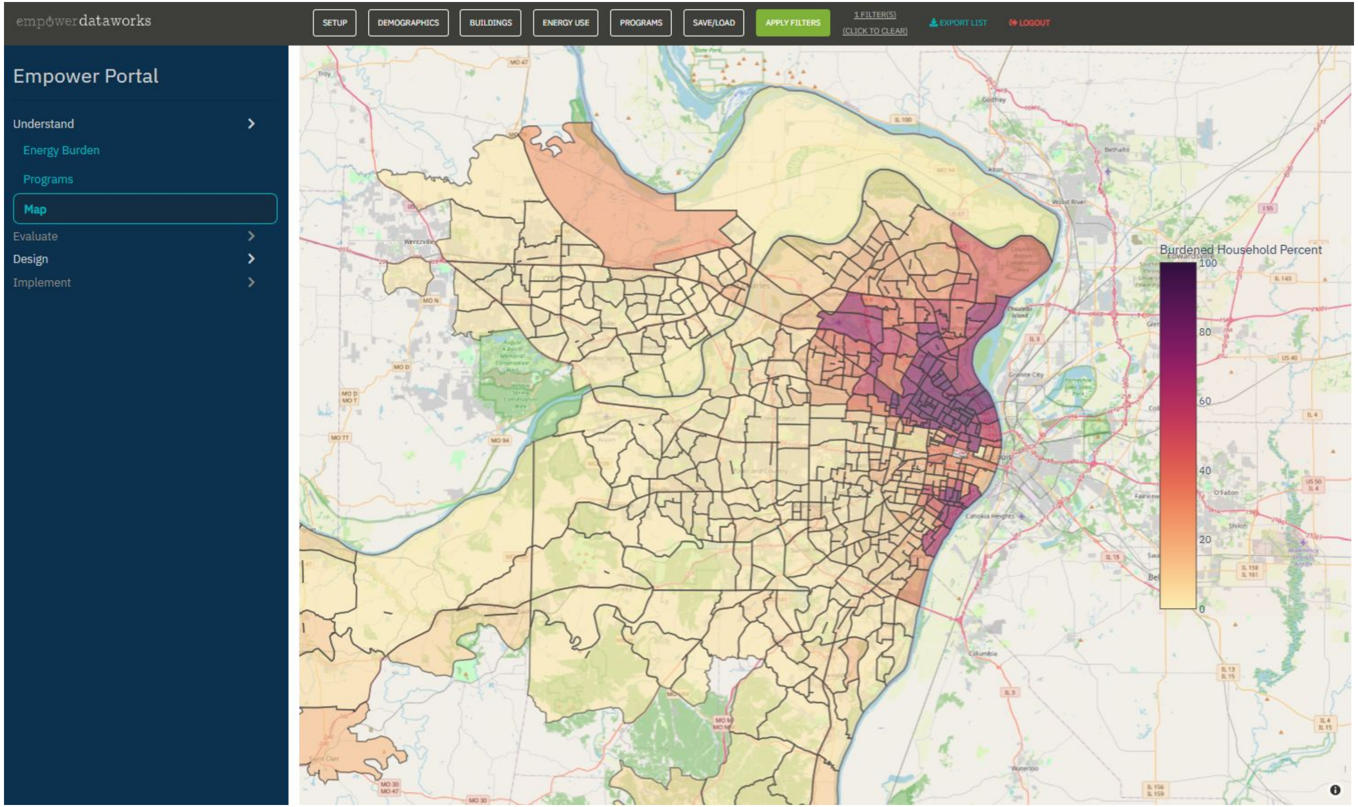
~155,000 (~13% of customers)



Spire Gas Burden Overview



Spire Missouri **Energy Burden Portal**



Liberty Missouri **Energy Burden**

Energy Assistance Need

$38M

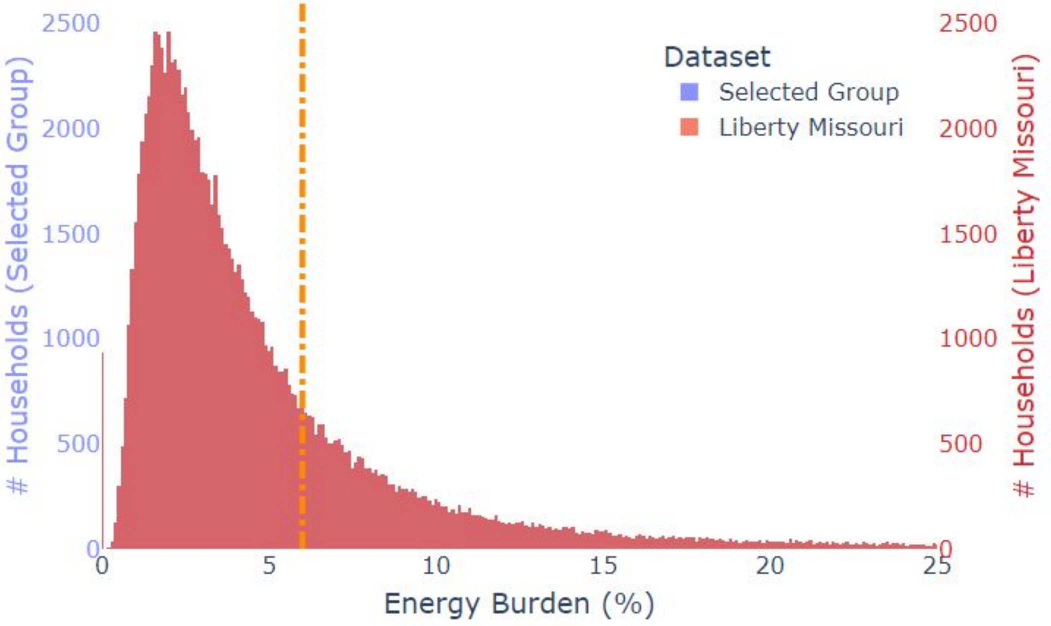
Low Income Households

<60% SMI: **~45k**

Median Electricity Burden
~3.5%

High Burden Households

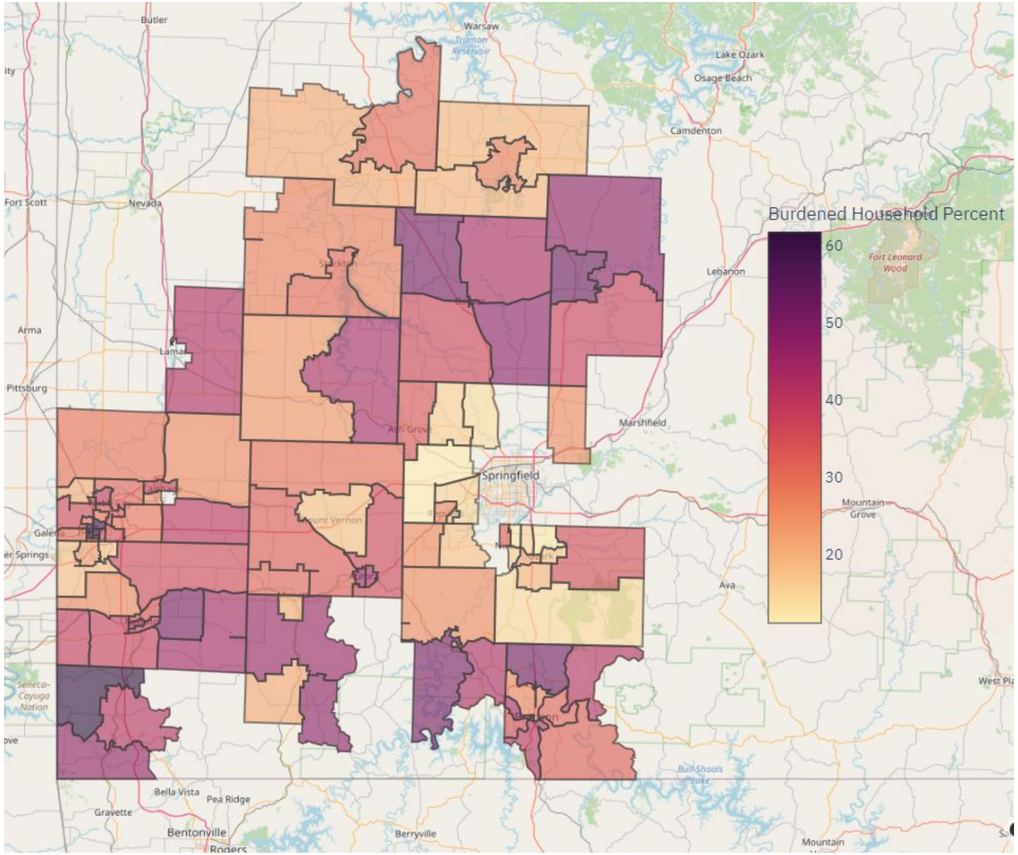
~37,000



Note: Energy burden is based on total household energy use. In this assessment, we use separate thresholds for electric heat (6%) and non-electric heat households (4%) (based on average gas bills in the area), since we don't have gas or delivered fuel data.

Liberty Electricity Burden Overview

Bottom line: Highest concentrations of energy burden in Joplin and McDonald, Polk and Dallas counties.



Observations on Missouri energy assistance (based on Liberty and Spire service areas in 2023-24)

- ***Good program impact but limited funding:*** Existing federal, state and utility programs have a significant impact on energy burden and keeping participants connected to service, but are small in size relative to the need.
- ***Intervention vs. Prevention:*** Most available federal, state and utility programs are focused on assistance after a payment crisis - not prevention through improved affordability.
- ***Participation barriers:*** Rural areas and geographic size are a challenge for outreach.
- ***Utility use of energy burden data:*** Spire/Liberty staff have been excited about using granular energy burden data for program design and targeting.

Questions?

Email: **hassan@empowerdataworks.com**

LUNCH

Return at:

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Presentation from RMI: Targeted Customer Affordability Program Design and Implementation Considerations

Maria Castillo – Manager of Low-Income Energy Affordability, RMI

Missouri PSC Public Service Commission

Targeted Customer Affordability Program Design and Implementation Considerations

MO PSC Stakeholder Workshop Presentation

June 30, 2026

Introductions

Maria Castillo
Manager,

RMI Electricity Program

Carina Rosenbach
Senior Associate,

RMI Electricity Program

RMI and Public Utility Commissions

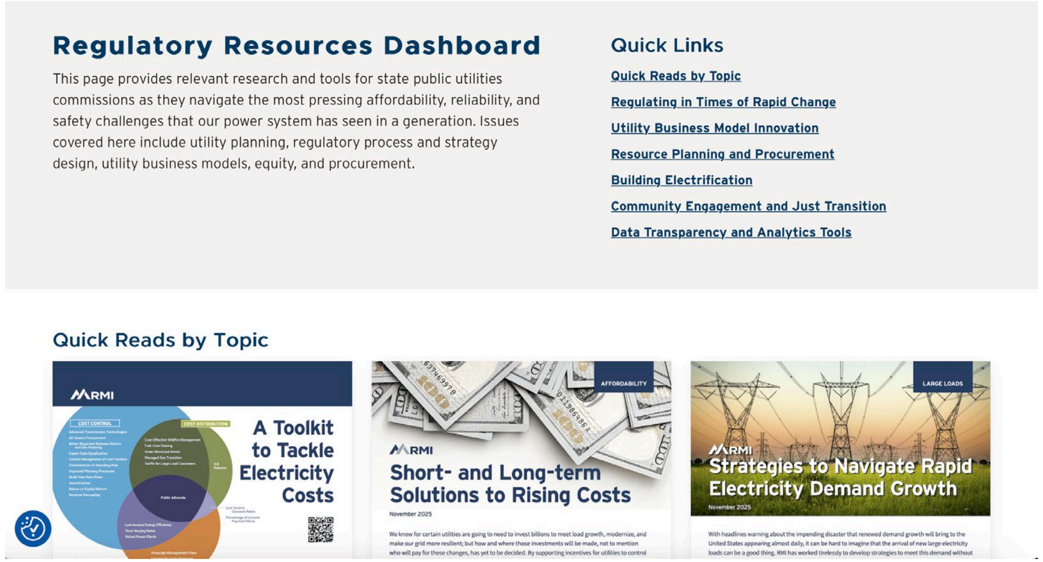
RMI is an independent, non-partisan, non-profit that works to accelerate an affordable energy transition. We bring together collaborations of decisionmakers to support change on the scale needed to support a clean and prosperous future for all. PUCs are a critical decisionmaker to enable that change across electricity, buildings, industry, and increasingly transportation.

How RMI Shows Up at PUCs

- **Direct consultants** to PUCs on specific dockets, including advisory support, facilitation, regulatory drafting, quantitative and regulatory analysis
- **Technical assistance** on PUC modernization, process design, affordability topics
- **Peer networks** for Commissioners & staff, like Reg Lab
- **Expert witnesses** for PUC staff, consumer advocates, environmental advocates, or other parties
- Sources **of data and resources** for PUC staff and parties. In rare cases, offering **public comment** or serving as parties (typically when requested by a PUC).

RMI Resources for PUCs

- https://rmi.org/regulatory-resources-dashboard/



Overview of the Energy Poverty Cycle

How do we measure affordability?

Energy affordability is the ability of a household to pay for their energy use <u>without forgoing basic necessities or risking health and safety.</u>

Metric 1: Rates — Energy price ($/ unit) × Consumption (kwh, therms) = **Metric 2: Bills** — Energy expenditures

Metric 2: Bills — Energy expenditures ÷ Household income = **Metric 3: Energy burden** — Energy burden

Energy burden is the share of income a household spends on its energy bills (electric, gas, and delivered fuels).

*A households is generally considered to be experiencing energy poverty if its energy burden is **over 6%. An energy burden over 15% is considered severe**.*

*Everyone has an energy burden,
but not everyone is energy burdened.*

Electricity Affordability Snapshot (MO)

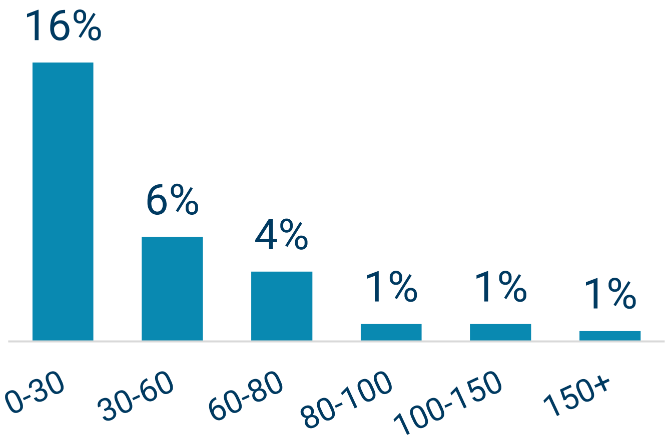
Average Monthly Bill (2024) **$114**

National Rank **23rd**

Disconnections (2024) **273k**

Disconnection Rank **15th**

Energy Burden by Income Group (% SMI)

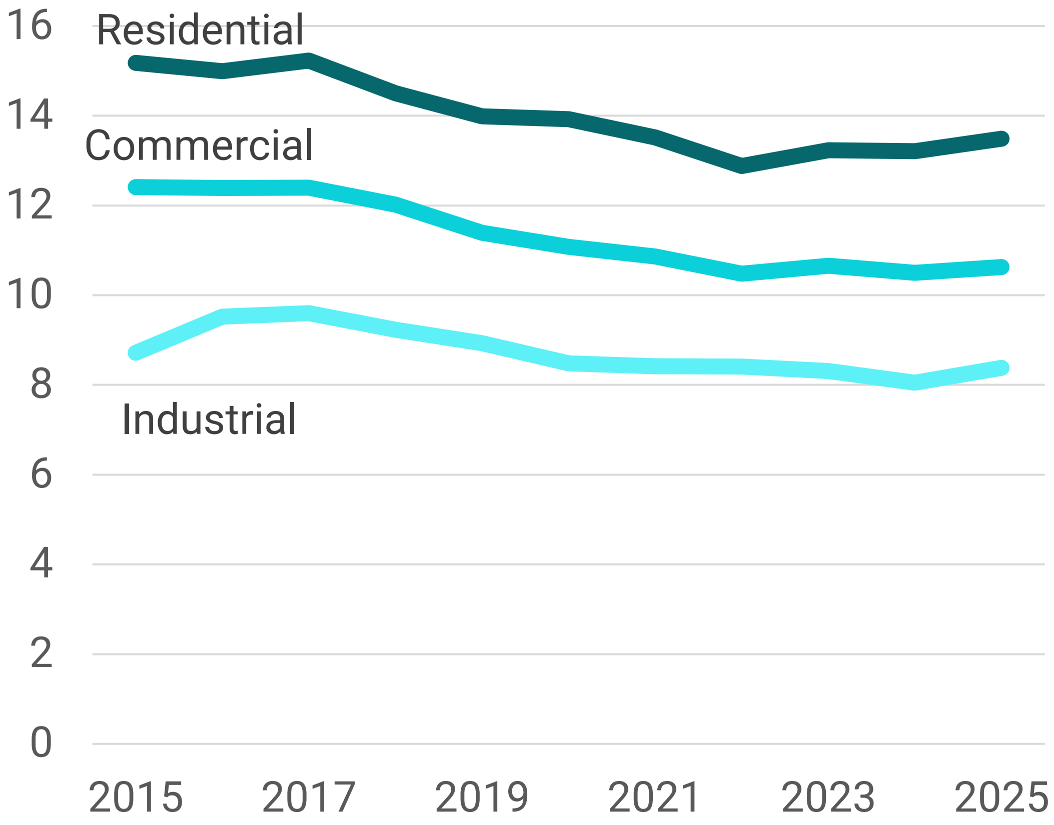


140k Households in Utility Arrears

$584 Avg. Overdue Utility Debt Balance

+18.7% change in overdue balance Q1 2022- Q2 2025

Electricity Prices by Sector
¢/kWh, 2025$



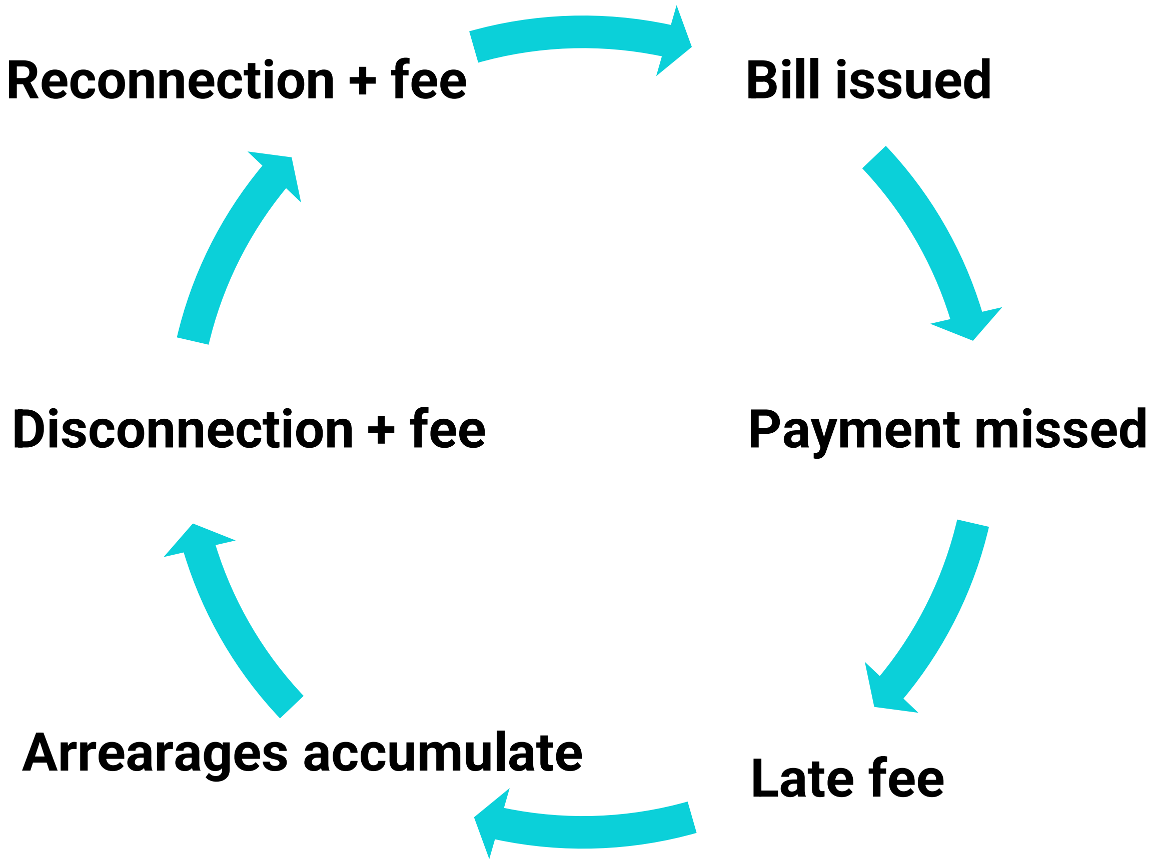
Sources: RMI, EIA, DOE, The Century Foundation, Energy Equity Project

What Happens When a Customer Can’t Pay

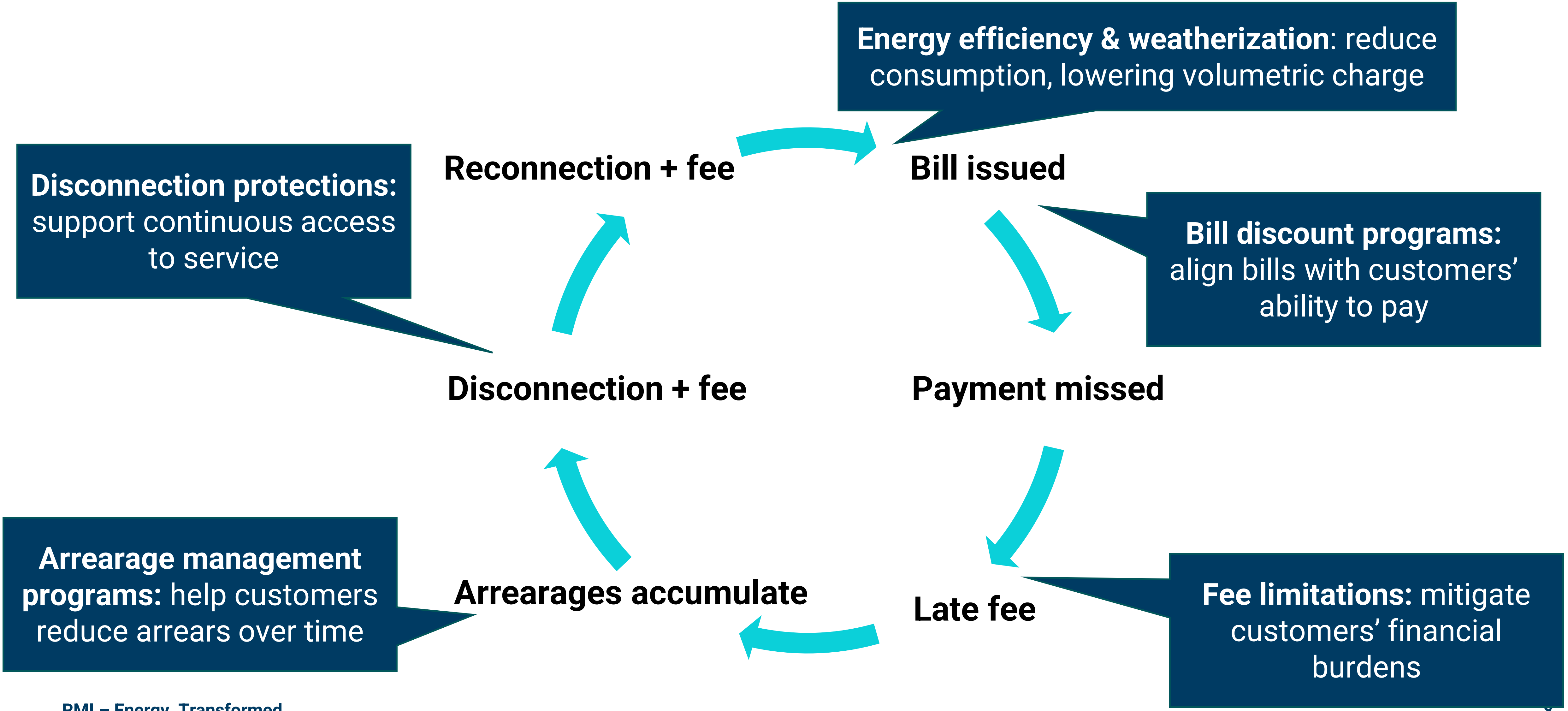
Disconnections

- Loss of access
- Exposure
- Eviction
- Child protective services

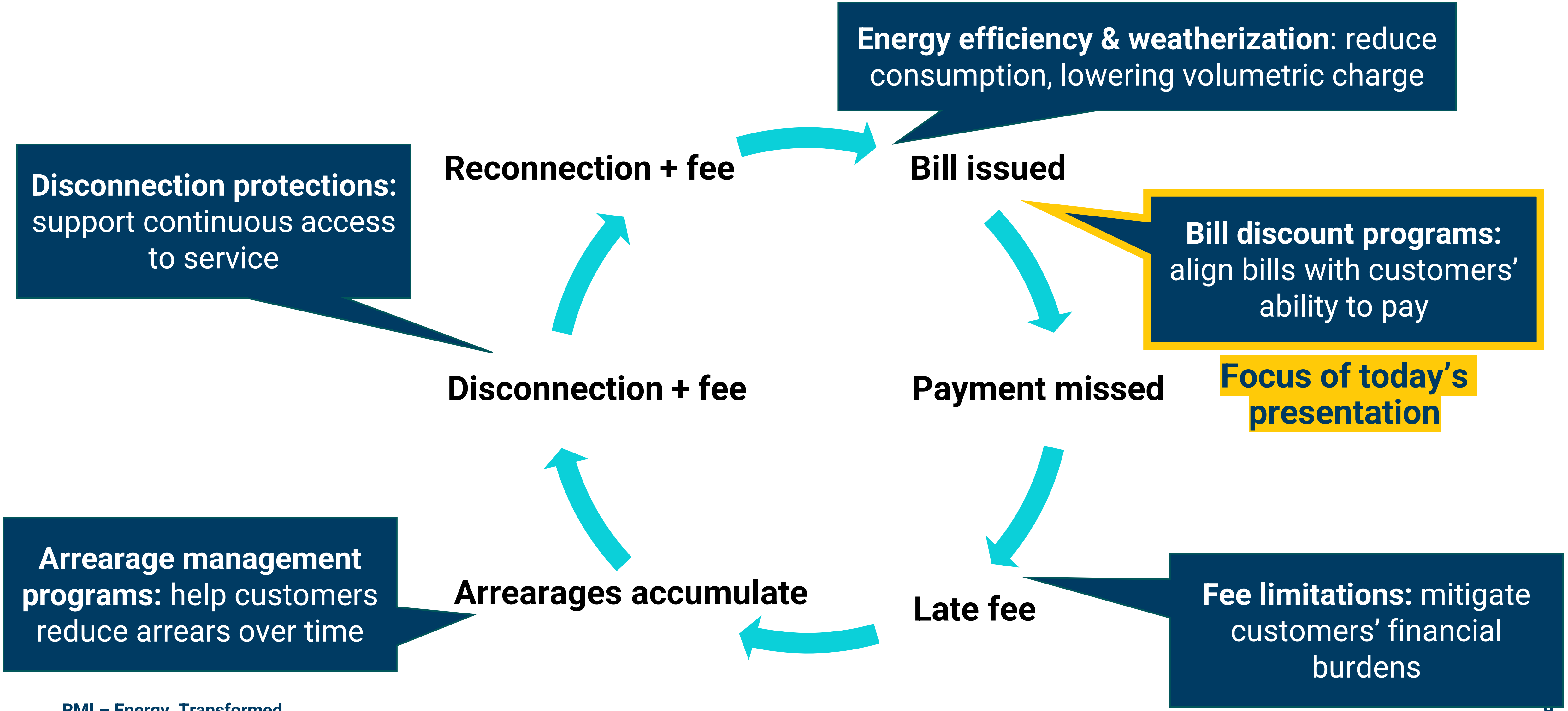
Energy Poverty Cycle



Policy Interventions to Break the Cycle



Policy Interventions to Break the Cycle



Three-Part Plan to Address Energy Affordability

Adopt the right policies

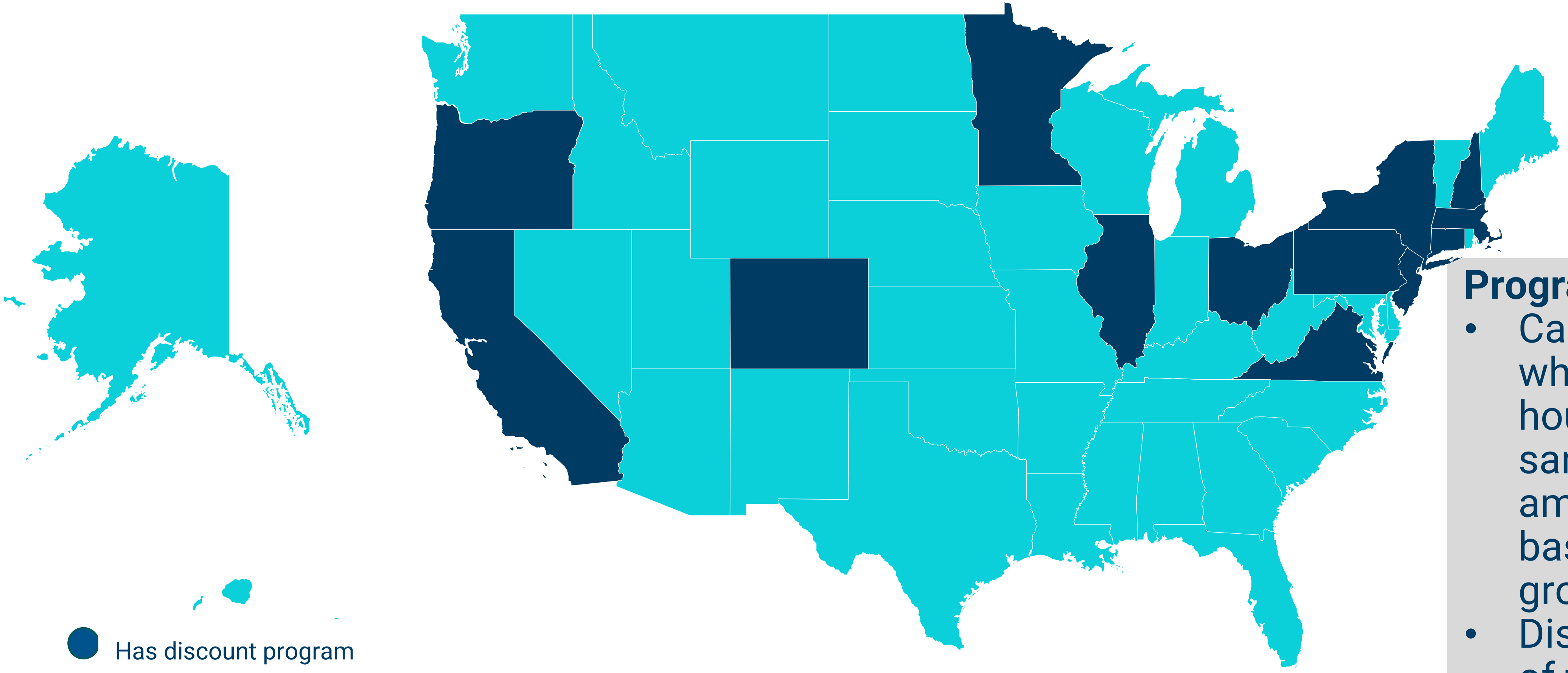
Pay for them

Increase adoption

Bill Discount Program Design

Income-Qualified Bill Discount Programs

At least 13 states offer low-income bill discount and/or percentage-of-income payment plans (PIPPs)



Has discount program

Does not have discount program

Program Variations:

- Can be **flat** discounts where all eligible households receive same benefit amount or **tiered** based on income group
- Discounted portion of the bill also varies
- Or bills can be capped based on income (e.g., PIPPs)

Bill Discount Program Structures

The design of income-qualified programs varies but generally falls into two main categories:

Percent discount off full bill

Tiered Discount

- Indiana, NIPSCO: 15-32% discount off full bill
- Arizona, APS: 25% or 60% discount off full bill
- California, CARE Program: 30-35% discount off full electric bill; 20% discount on gas

Flat Discount

- Georgia, Georgia Power: $33.50 discount per month

Percent discount off portion of bill

- D.C., Pepco: 100% off distribution charge

Low-Income Discount Benefits & Drawbacks

Benefits

- Reduce energy burden
- Proactively limit arrears accumulation + disconnection risk
- Can stimulate more timely, full payment
- Simpler to administer than PIPPs
- Still preserve some marginal incentive to save energy

Drawbacks

- May not sufficiently improve affordability for the most energy burdened customers
- Typically funded through bill surcharge for other ratepayers

Low-Income Discount Design Considerations

- Agency data sharing, geotargeting, automatic enrollment, and/or self-attestation can help scale participation
- Discounts on the total bill rather than just a portion can provide more protection
- Flat discounts are more administratively simple, while tiered discounts provide more targeted support
- Can be paired with energy efficiency and arrearage support to strengthen affordability outcomes

PIPP Benefits & Drawbacks

Benefits

- Directly cap energy burden
- Proactively limit arrears accumulation + disconnection risk
- Can stimulate more timely, full payment
- Protect against rising and/or volatile bills

Drawbacks

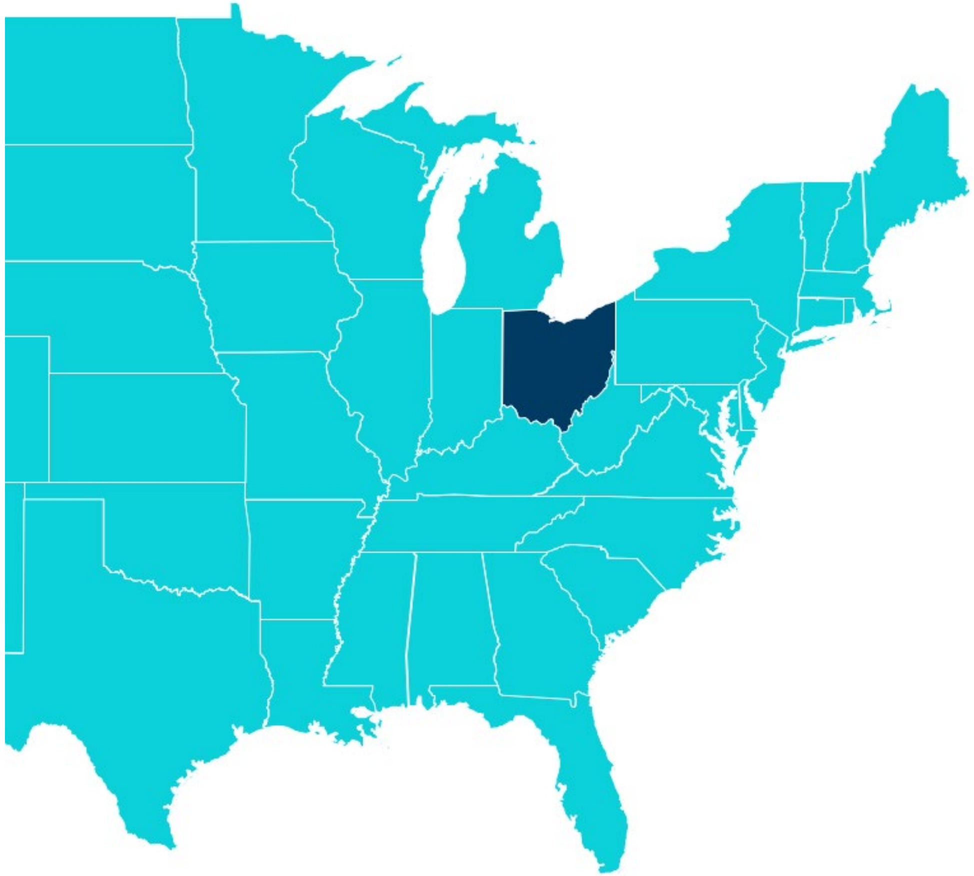
- Typically, more administratively complex relative to other assistance programs
- Administrative complexity could yield low adoption rate
- Typically funded through bill surcharge for other ratepayers
- May change customer's marginal incentive to save energy

PIPP Design Considerations

- Agency data sharing and/or geotargeting can help streamline enrollment processes
- Total household energy burden (electric and non-electric fuels) can be used to set PIPP targets
- Can be paired with energy efficiency and arrearage support to strengthen affordability outcomes

Case Study

Ohio PIPP



- **Eligible customers' bills are capped at a set percentage of household income**
  - Gas-heated homes pay 5% of income for gas + 5% for electric
  - Electric-heated homes pay 10% of income total
- **Minimum monthly bill payment = $10**
- **Arrearage forgiveness component**
  - On-time, in-full payments reduce past-due balances
  - 24 consecutive on-time payments eliminate remaining arrears
- **PIPP is funded through a Universal Service Fund rider on residential electric customer bills**

https://development.ohio.gov/individual/energy-assistance/2-percentage-of-income-payment-plan-plus

Program Eligibility and Enrollment

Determining Eligibility for Targeted Assistance

Population categorizations		
Household energy assistance guidelines	Other targeted assistance program guidelines	“Cliff” populations

Household Energy Assistance Guidelines

LIHEAP

0-60% State Median Income

0-150% Federal Poverty Guideline

Categorial eligibility (some states)

State programs

Vary by state but typically similar to LIHEAP guidelines

Other Targeted Assistance Program Guidelines

Supplemental Nutrition Assistance Program (SNAP)	Net monthly income must be <100% FPL
Supplemental Security Income (SSI)	Individuals who earn less than $2,019 each month
Temporary Assistance for Needy Families (TANF)	0-200% FPL

“Cliff” Populations

Income boundary

- Populations that do not qualify for assistance but are right on qualification boundary (e.g., household income is 65% of State Median Income for LIHEAP)

Impact

- Often, these households are also in need of relief but do not receive it

Adoption Rates Depend on Enrollment Design

Typical Adoption Rates

Enrollment Design	Detail
Manual application with documentation	Highest-friction approach: customers must know the program exists, apply, document eligibility, and renew.
Data sharing (narrow source)	Data sharing helps identify customers, but reach is constrained if the underlying dataset covers only a fraction of eligible households (e.g., LIHEAP participating customers).
Targeted outreach / streamlined eligibility	Reduces friction through proactive outreach, simplified forms, categorical eligibility, etc., but still requires customer action. customer action.
Self-attestation + verification	Streamlines upfront income documentation but adds post-enrollment audits; still requires customers to enroll.
Data sharing (broad source)	Broader benefit datasets (e.g., SNAP, Medicaid) can identify more eligible households.
Mature automatic enrollment	Lowest-friction model: broad data access, strong account matching, automatic or opt-out enrollment, and ongoing outreach to fill gaps.

Expanding Program Enrollment

Increasing adoption is key to unlocking program benefits

SELF-ATTESTATION– Customers report their own income to qualify for bill relief program, without needing to provide extensive documentation. Reduces administrative burden and increases adoption.

DATA MATCHED ENROLLMENT– Identify and enroll eligible customers through information sharing and collaboration between utilities and state agencies (e.g., cross-enroll customers in nutrition assistance and energy assistance programs).

PLACED BASED ENROLLMENT– Automatically enrolls customers within defined geographies (e.g., census block group) with no individual income verification required. Customers can opt-out.

MARKETING & OUTREACH – In addition to traditional channels such as bill inserts and marketing campaigns, consider partnering with local community-based organizations to support program marketing and outreach to customers in need.

INCREASED INCOME ELIGIBILITY – Extending program eligibility to moderate income customers when data indicates there is a need.

There are two primary types of automatic enrollment:

Place-based

- Automatically enrolls customers within defined geographies (e.g., census block group)
- Uses area-level indicators (e.g., energy burden, income proxies) to target relevant geographies for program enrollment
- No individual income verification required
- Customers typically enrolled on an opt-out basis

Data-matched

- Automatically enrolls households participating in other means-tested benefit programs (e.g., SNAP, Medicaid) on opt-out basis
- Relies on data sharing with government agencies to identify eligible customers
- Expands reach of bill assistance programs and reduces required effort for households to access benefits
- Typically no separate income verification required

Place-based automatic enrollment enables rapid participation at scale, but sacrifices targeting precision

Example: Xcel Energy's Automatic Bill Credits Pilot in Minnesota automatically enrolls residents of 63 census blocks (17,000 households) based on high electric energy burdens in those areas.

Benefits

- Very high participation with minimal customer effort
- Low administrative complexity

Tradeoffs

- Inherently imprecise targeting (over- and under-inclusion)
- Typically supports flatter or more modest benefit levels

Design Considerations

- Interaction with other affordability programs

Data-matched automatic enrollment drives high participation with precise targeting, but can entail varying degrees of administrative complexity

Example: NIPSCO's Customer Assistance for Residential Energy (CARE) bill discount program in Indiana automatically enrolls customers participating in LIHEAP.

Benefits

- Typically high enrollment rates relative to traditional outreach methods
- Relatively high precision in targeting eligible households
- Expanded program reach via data sharing
- Protecting program integrity

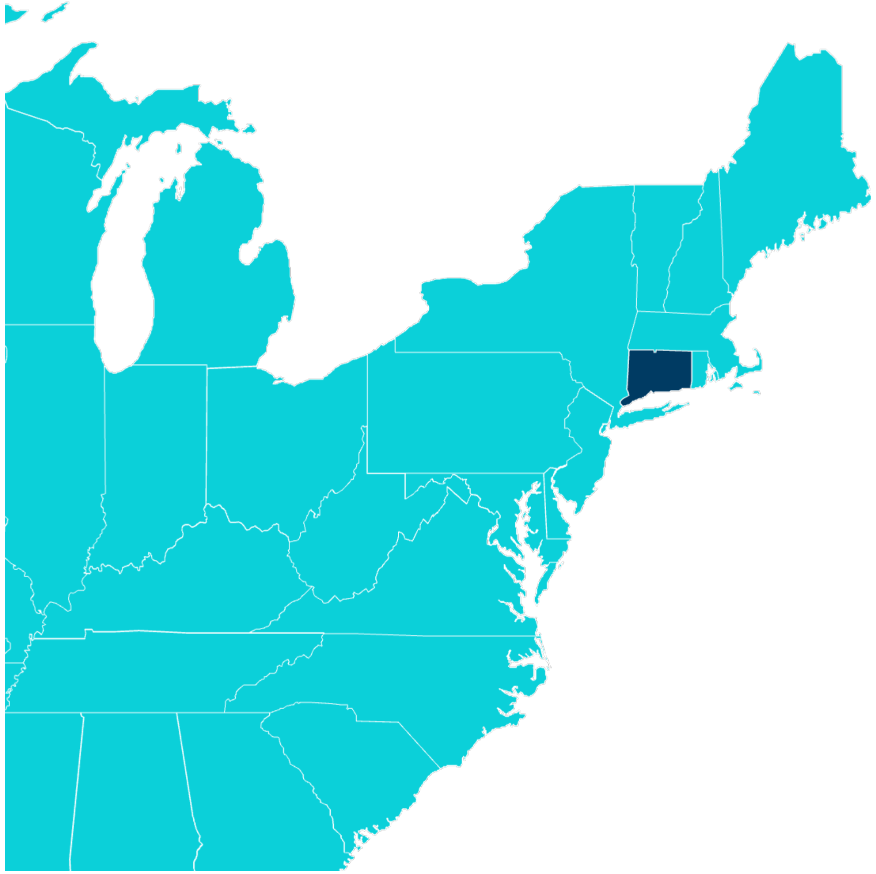
Tradeoffs

- May be administratively complex, depending on available data and social service agency capacity
- Can drive cost growth if enrollment is underestimated

Design Considerations

- Careful data privacy agreements
- Customer consent for data sharing
- Alignment of eligibility guidelines across LIHEAP and state/utility program
- Maintaining multiple enrollment pathways

Data-Matched Automatic Enrollment: Connecticut DSS Data Sharing



- **Five-tier discount rate**: 5%, 15%, 20%, 40% & 50% discounts based on income relative to federal poverty level.
- **Automatic enrollment**: Enrolls income-eligible customers participating in other state benefit programs; no application or income verification.
- **Data exchange with state agency**: Utilities signed a data sharing agreement with the Department of Social Services to access customer eligibility information. The agreement limits data to the minimum necessary for eligibility verification.
- **Customer opt-out**: Customers are notified of the data sharing agreement when they enroll in state benefit programs and may opt out then or at any time through a public webpage

Self-attestation for program enrollment can drive high participation at low administrative costs while generally preserving program integrity, depending on design

Example: Avista uses self-attestation for enrollment in low-income discount programs and arrearage forgiveness and management programs in Oregon and Washington.

Benefits

- Easy application process drives high enrollment rates relative to traditional methods
- Limited instances of free-ridership or fraud in existing state examples

Tradeoffs

- Typically lower enrollment rates than automatic enrollment methods
- Tradeoff between program integrity & attrition through auditing requirements

Design Considerations

- Application and re-enrollment process
- Customer engagement strategies for outreach & applications

Administrative complexity depends on two separate design choices

Benefit structure: what benefit is the utility administering?

Least complex → Most complex
Flat bill credit → Tiered bill credit → Flat discount → Tiered discount → PIPP / income-based plan

Complexity increases with variable benefits, billing-system changes, and recalculation.

Enrollment approach: how does the utility identify eligible customers?

Least complex → Most complex
Categorical eligibility → Self-attestation → Customer application → Data-matched auto-enrollment

Complexity increases with documentation review, eligibility verification/recertification, data sharing, and account matching

Cost Recovery

Funding Low-Income Programs

- Most common funding model for programs
- All customers vs. just residential
- Large loads

Ratepayer

- LIHEAP/WAP funding model

Federal tax

- Sometimes used for one-time or ongoing bill credits/rebates

State tax

- Sometimes used for one-time or ongoing bill credits/rebates

Shareholder

Costs & Benefits of Low-Income Programs

Low-income programs have costs, but they also deliver benefits that can reduce or offset those costs overall.

Costs (put upward pressure on rates)

- Benefit/service delivery (e.g., $$ for bill reductions)
- Program administration

Benefits (put downward pressure on rates)

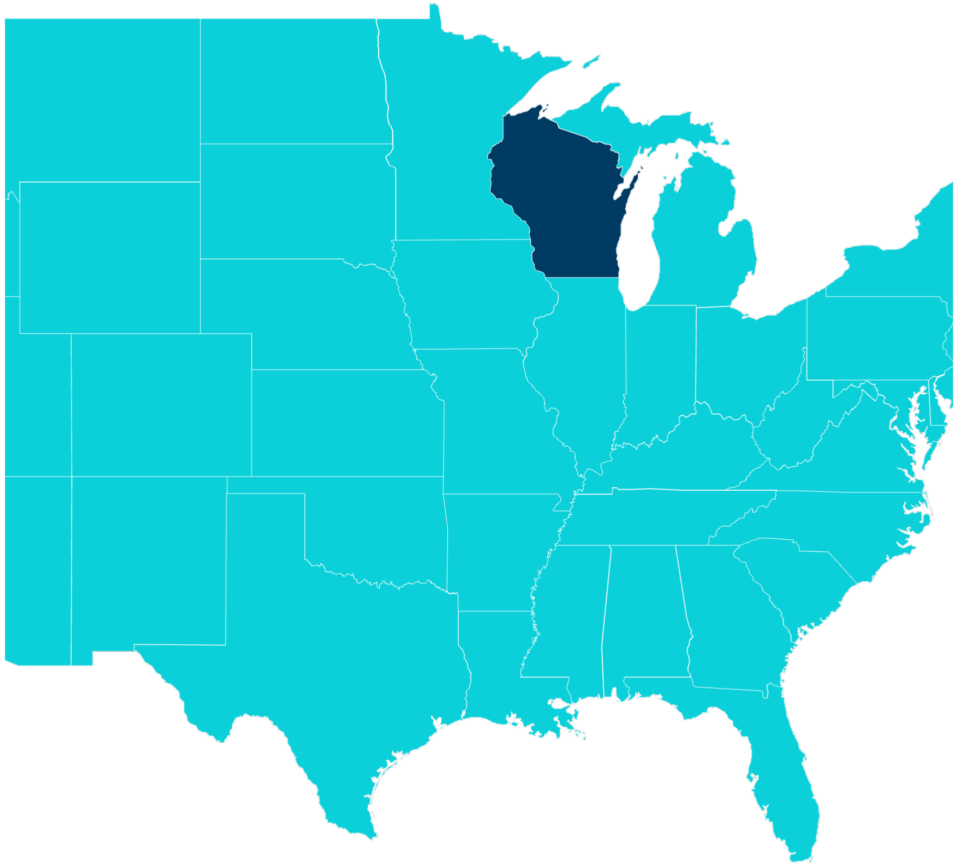
- Avoided arrears / uncollectible expense
- Avoided collection costs
- Improved payment stability
- Broader societal outcomes

RMI, "How Low-Income Customer Programs Lower Energy Costs for Everyone"

Additional Information on Benefits of Targeted Customer Assistance Programs

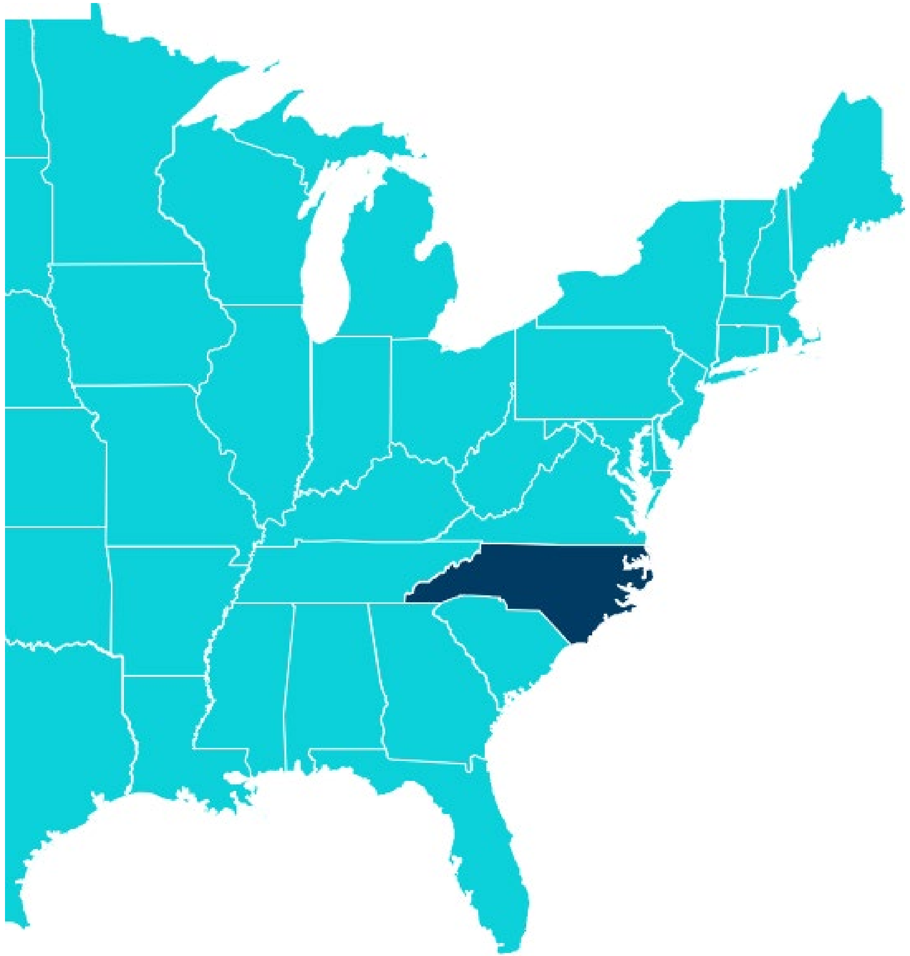
Avoided arrears	Avoided collection costs	Improved payment stability	Broader societal outcomes
• Lower bills reduce the gap between charges and ability to pay • PIPPs cap bills at an affordable share of income, preventing new arrears from accumulating	• Fewer past-due accounts mean fewer notices, calls, shutoff/reconnect actions, and payment arrangements • Lower uncollectible debt reduces costs otherwise recovered from all ratepayers	• PIPPs / bill discounts make bills predictable month to month, helping customers stay current rather than cycling in and out of delinquency	• More household cash flow for rent, food, medicine, and other essentials • Reduced risk of eviction, reliance on social services, and crisis assistance needs

Costs & Benefits Case Study: Alliant Customer Affordability Program (CAP) Pilot



- Geographically targeted electric bill credit pilot serving 5 high-need census tracts, selected based on energy burden and disconnection rates
- $26/month bill credit (≈ 25% of the average LIHEAP customer electric bill)
- Projected to ***reduce the utility revenue requirement in both years*** of the pilot, generating a net system benefit
  - Estimated costs: ~$351k (2026); ~$428k (2027)
  - Estimated avoided costs/benefits: ~$393k (2026); ~$523k (2027)

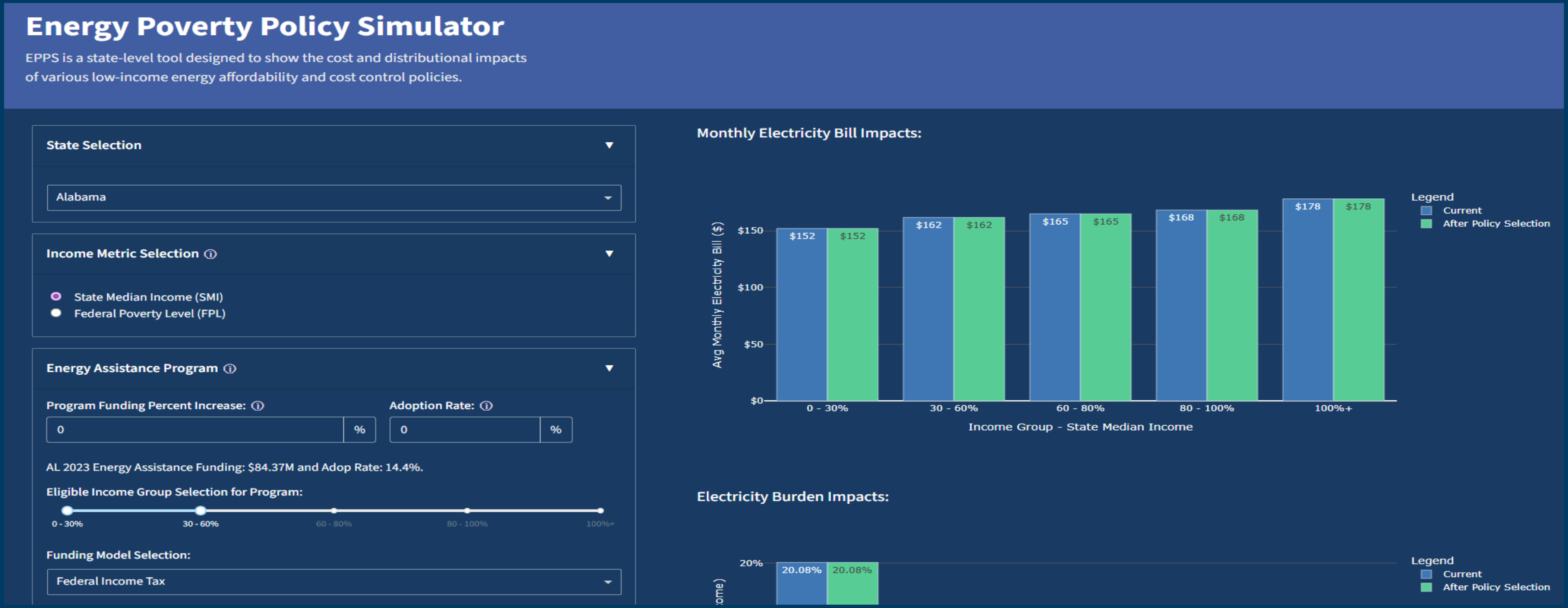
Automatic Enrollment: Duke Energy's Customer Assistance Program (CAP)



- Households can receive a bill credit of up to $42/month for 12 months, renewable
- Customers receiving LIHEAP or Crisis Intervention Program (CIP) funding are **automatically enrolled** through a data-sharing agreement between Duke Energy and the Department of Health and Social Services
- In 2024, customers participating in CAP experienced a nearly **5x decrease in uncollectible debt** compared to all residential customers

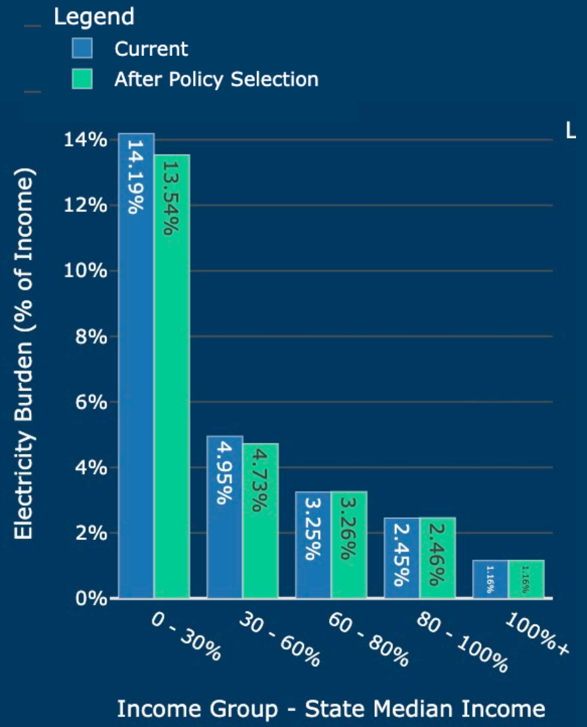
> "[Auto-enrollment] will help **minimize administrative costs**, maximize participation, and create an easy, seamless customer experience."
>
> *- Duke Energy NCUC testimony, 2023*

RMI has developed a tool to estimate the costs and benefits of enacting a bill assistance program

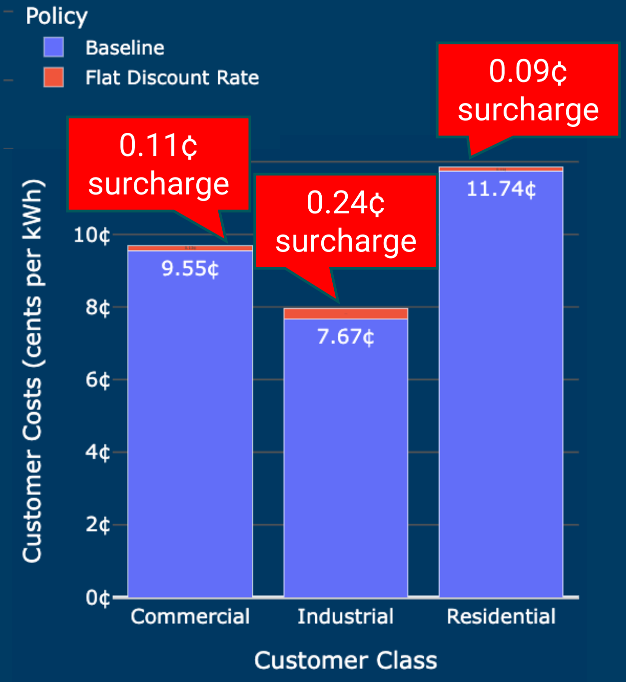


Modeling the Costs & Benefits of a Bill Discount Program in MO

Scenario #1: Modest Program, Traditional Outreach Methods for Enrollment
25% Flat Discount Program at 20% Adoption Rate
Applied for customers < 60% State Median Income (SMI)
Funded by all ratepayers



Electricity Burden Reduction for Entire Income Group



Ratepayer Costs

State	Policy	Cost
MO	Flat Discount Rate	$52.5M
MO	Savings from Avoided Arrears	$-13.0M
MO	Total Cost of All Policies	$39.6M

Costs & Savings from Avoided Arrears

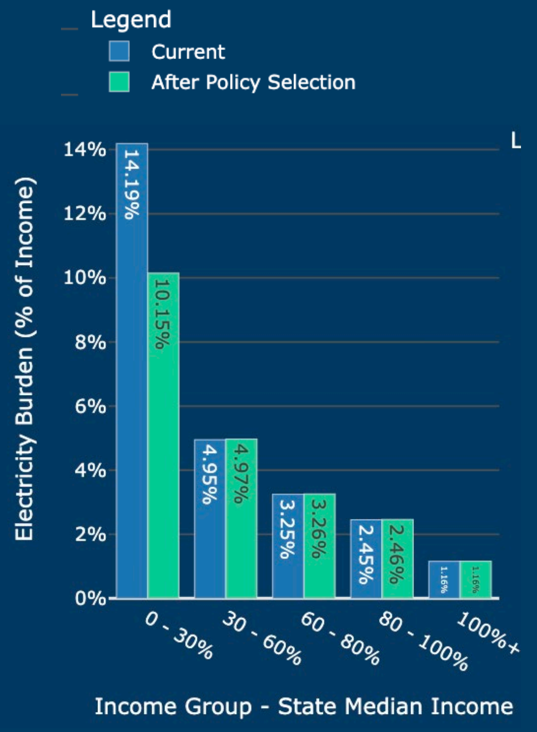
Modeling the Costs & Benefits of a Bill Discount Program in MO

Scenario #2: More Significant Benefit, Data Sharing for Enrollment (Broad Source)

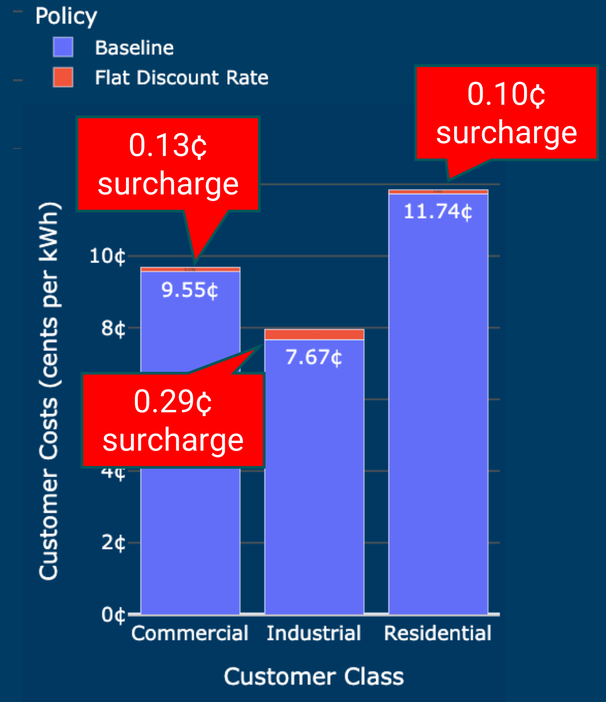
6% PIPP at 50% Adoption Rate

Applied for customers < 60% State Median Income (SMI)

Funded by all ratepayers



Electricity Burden Reduction



Ratepayer Costs

State	Policy	Cost
MO	PIPP	$119.0M
MO	Savings from Avoided Arrears	$-80.6M
MO	Total Cost of All Policies	$38.4M

Costs & Savings from Avoided Arrears

Thank you!

Reach out to us at mcastillo@rmi.org and crosenbach@rmi.org with any questions or requests for support!

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- **Takeaways from the Critical Medical Needs Program Evaluation Report**
- Communication and its Role in Utility Assistance
- Closing

Takeaways from the Critical Medical Needs Program Evaluation Report

Carrie Morrow – Customer Communications and Policy Analyst, MO OPC

CRITICAL MEDICAL NEEDS PROGRAM: A Recommendations Overview

Report by: APPRISE Group

Presented by: Carrie Morrow

Program Overview

Adopted as a 3 year pilot by Spire in 2023

- Subsequently adopted as pilot programs by Ameren, MO American Water, Evergy, and Liberty

Goals:

- Ease of use/ eligibility for multiple utilities with one point of contact
- Maintain or restore utility service
- Address customer arrearages
- Provide case management to reduce burden after 30-day hold
- Streamline process for obtaining complimentary services

Eligibility Criteria

Administered by three United Way agencies, each with slightly different rules on payment issues and repeat assistance

Core Criteria:

- Critical medical need that would worsen if utility services were not available
- Medical professional referral
- Account with contracted utility
- Outstanding balance on contracted utility bill
  - St. Louis requires arrearage
  - Joplin and KC require shutoff notice or disconnection

APPRISE Report Findings

Jacqueline Berger, Ph.D.

Applied Public Policy Research
APPRISE
Institute for Study and Evaluation

Program Design and Funding

Assistance Provided

- 30- day hold on disconnection
- Arrearage payment assistance without typical income guidelines
- Referrals and guided assistance to other energy programs

Funding Provided

- Total of $5,674,580 allocated across 5 utilities over 3 years
- Funding 50/50 split between ratepayers and shareholders
- 1,369 unique customers served from inception to June 2025

Basic Statistics

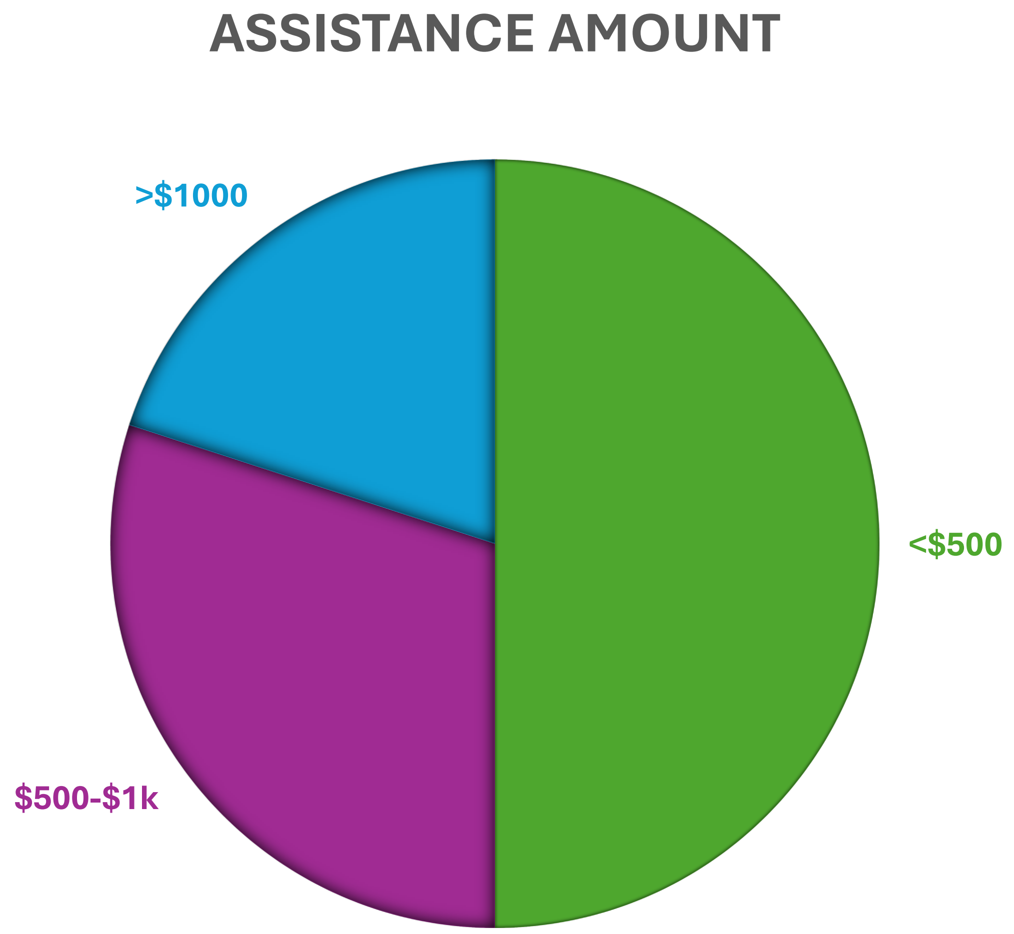
Most common ineligibility reason was customer lacking termination threat or past due amount, followed by customers not applying for assistance with a contracted utility

Outcomes assessed on average 12-13 months after CMNP receipt:

- 75% of customer still had active accounts

- Only 8-11% were enrolled in bill payment assistance programs

- Mean arrearages declined $328



Program Design Recommendations

Maintain flexible eligibility criteria without income guidelines and 30-Day disconnection hold

Potential improvement to add flexibility to who is able to sign the medical attestation forms

Assess the impact of using CMNP funding before other assistance on CMNP grant amounts and client receipt of LIHEAP and other energy assistance

Consensus formed on what elements should have statewide standardization

Discuss potential options for how to expand CMNP to municipal and cooperative customers

CMNP Outreach

United Way Outreach: Provide ongoing outreach and training to medical providers to grow the network and maintain knowledge among new medical staff

Medical Provider Communication: Convene medical providers 1-2x a year to share information about program successes and opportunities

Utility Outreach: Utilities should proactively conduct outreach to social service organizations and communicate about program with customers indicating prior medical needs

Utility Staff Awareness: Educate all staff who work directly with customers about the program

Case Management

Continue with United Way management to allow clients to receive assistance with multiple utilities through one application

Continue providing the United Way agencies with access to utility billing systems to facilitate the CMNP benefit determination process

Ask clients if they have additional needs and help obtain assistance when they provide CMNP benefits

The collaborative should work with state agencies that administer other program benefits to prioritize CMNP participants, as was done in Maryland

Utilities or agencies that administer utility bill payment assistance programs should also prioritize CMNP participants

The utilities should define and communicate follow-up expectations to the United Way agencies

The utilities should reach out to all CMNP participants (or eligible participants if they have this information) when the LIHEAP season opens in the fall to remind them to apply for a LIHEAP grant

Data and Reporting

The United Ways should develop a standardized system with information needed to further assist customers, maintain program integrity, and assess and refine the program

The United Way agencies should track and report more detailed budget and expenditure data, including costs for administration, outreach and training, case management services, and CMNP benefits awarded

The United Way agencies should report client outcomes to the providers

The utilities should provide documentation to the United Way agencies on how to access their billing systems to reduce the need for follow-up questions

Program Priority Analysis

The evaluation research found two key areas where the program does not appear to be working as it was originally intended.

1. The program is serving many customers who have long-term needs rather than a short-term medical crisis that the program can resolve and enable the customer to succeed following assistance.
2. The program does not appear to provide the level of case management services that was envisioned, through referrals and assistance at intake, and through later follow-up.

Recommendation: The collaborative should meet again to review data, discuss goals and priorities, and decide on how the CMNP should move forward, including the level of consistency that should be expected across the United Way agencies

Design Strategies

Eligibility: The program is not focusing on customers with short-term medical crises that can necessarily be overcome with a 30-day disconnection hold and assistance to remove current arrearages.

Case Management: Many participants are not receiving referrals and assistance with additional needs, and the United Way agencies are not following up to see if clients need additional help or to make sure they apply for LIHEAP when the program opens in the fall.

How Does This Apply To Other Programs?

What Have We Learned?

Broadly Applicable Concepts

Program Design

- Assess implications of program funding use when paired with LIHEAP and other assistance programs
- Statewide standardization of certain elements of program design can help reduce administrative burdens and simplify customer application streams

Outreach

- Program administrators can improve referral rates and information accuracy if they work with referral sources regularly and build an established relationship
- Utilities should incorporate assistance program training for frontline staff and lead outreach efforts to educate partners of their programs

Broadly Applicable Concepts

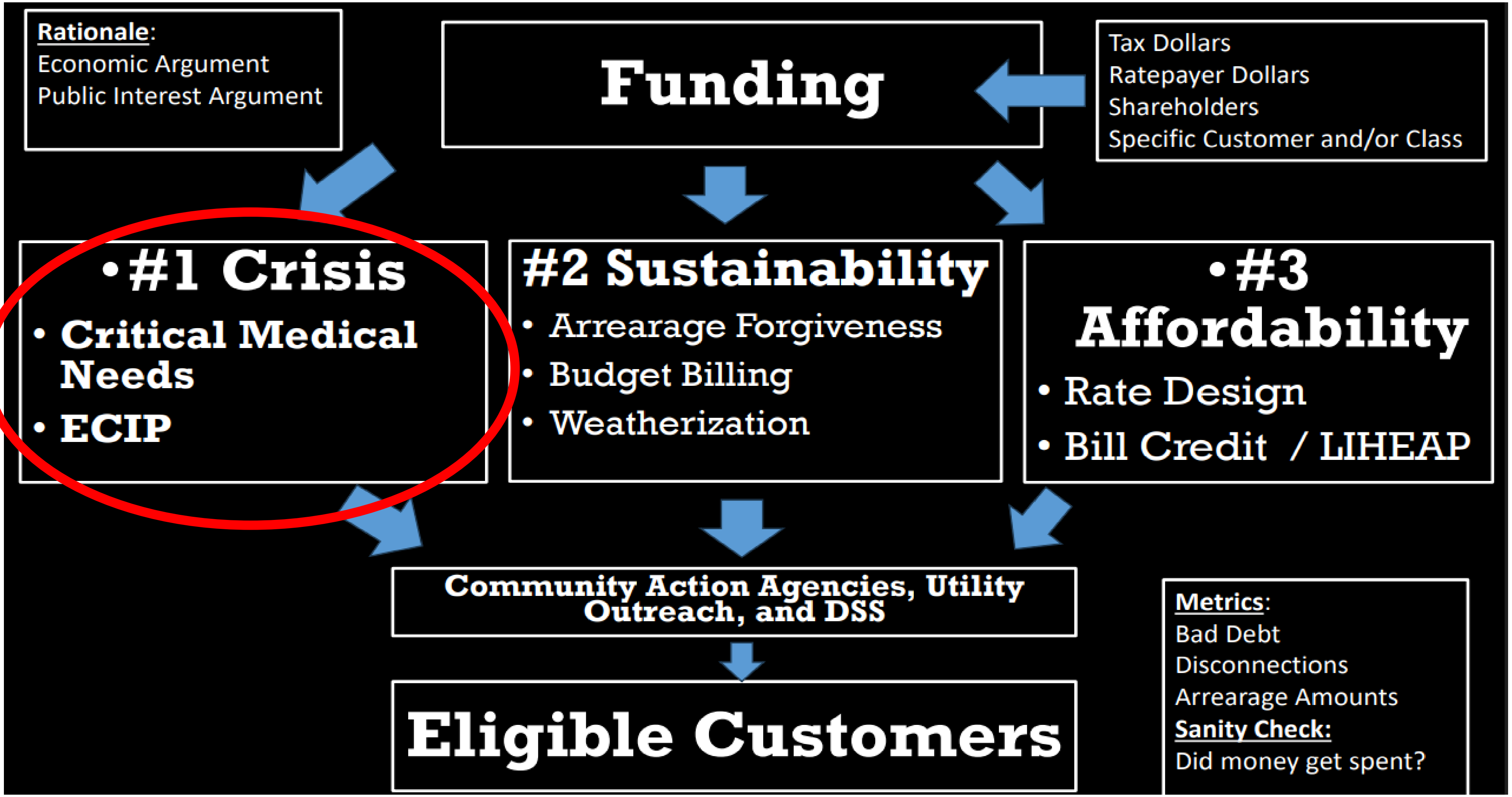
Case Management

- Access to multiple programs through one application
- Collaboration with state agencies for eligibility determination
- Program reminders established to help facilitate customer's use of programs
- Utilities and program administrators share billing access to lessen administrative burden for both sides

Data & Reporting

- Consistent documentation of administrative and programmatic practices to establish trends and help refine programs
- Utilities train program administrators on billing systems
- Reporting of successes and statistics to referral sources

No One Program to Rule Them All



Thinking Outside of the Box

- How do we find a better way around rate case restrictions for improving programming?
- Could our models be spread to municipalities and co-ops to address affordability in Missouri as a whole?
- What values are we assigning to the type of programs we are discussing? What problem do we want to solve?
- What should be the specific assistance actions (or mechanisms), keeping in mind other regulatory objectives?
- How can we apply best practices discussed today to a wider group of programs?

Thank you!

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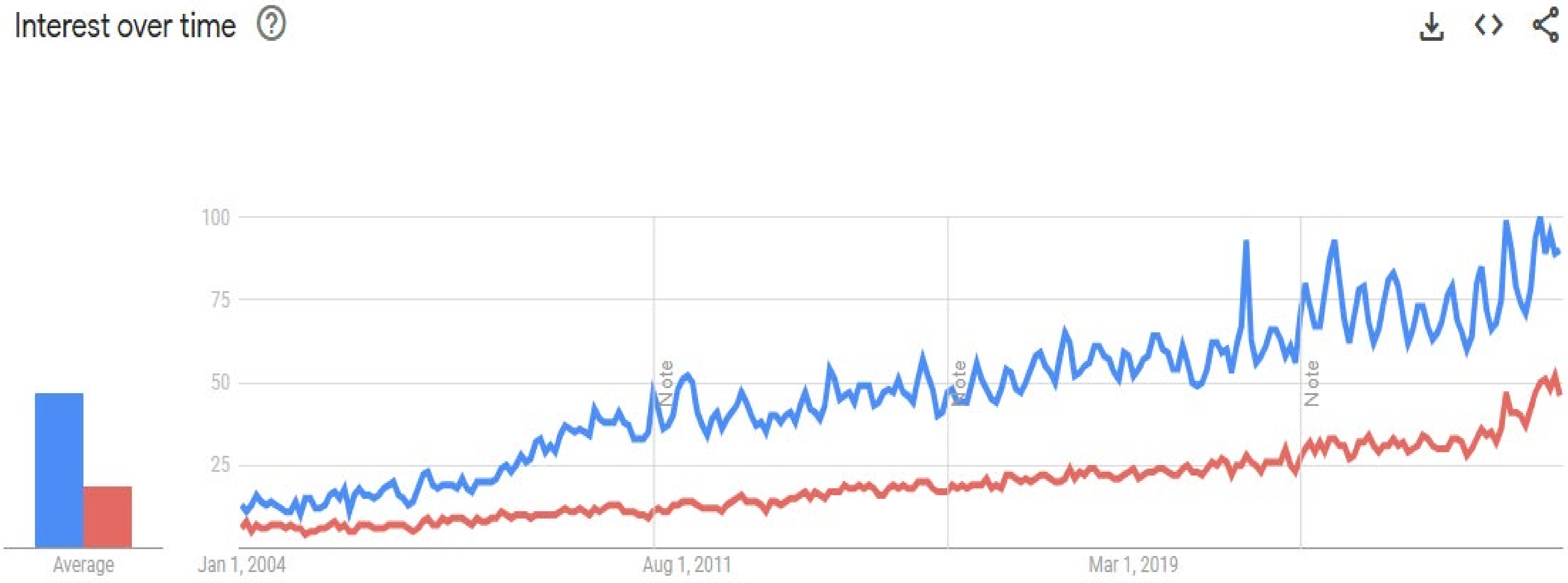
Communication and its Role in Utility Assistance

Sarah Fontaine – Director of Strategic Communications, MO PSC

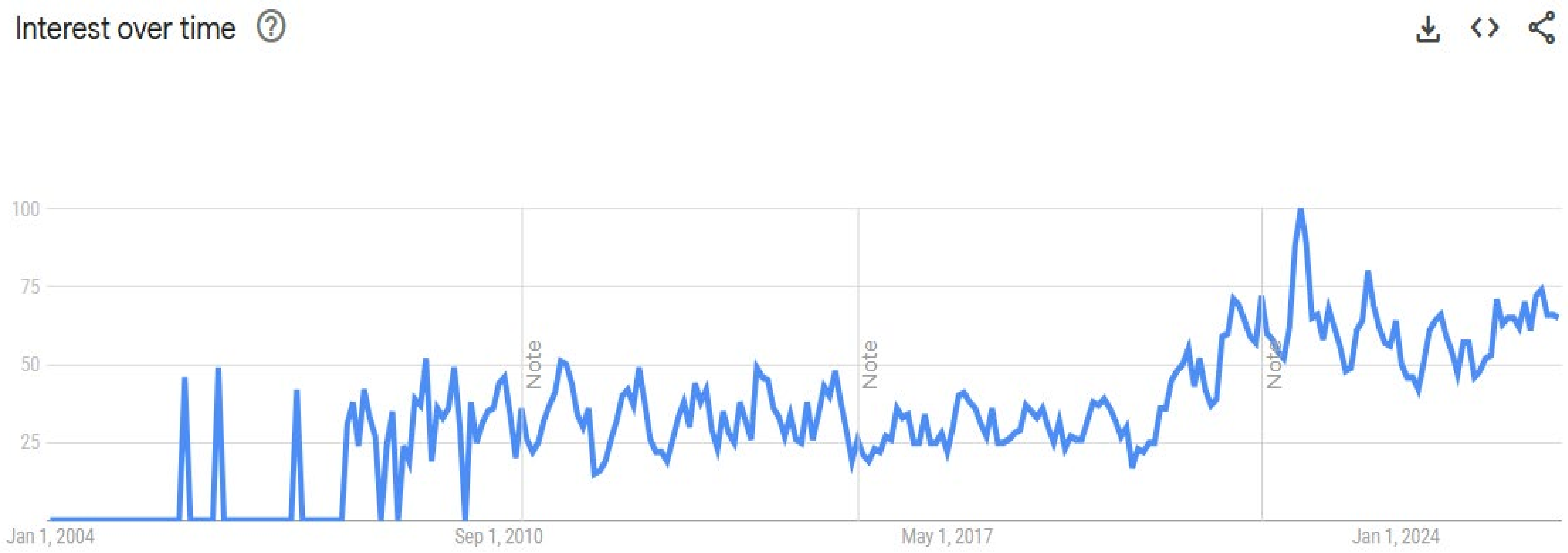
Meeting Customers Where They Are

Improving Communication to Increase Access to Utility Assistance Programs

Google Search Trends: Electric Bill & Utility Bill



Google Search Trends: Utility Bill Assistance



Why Communication Matters

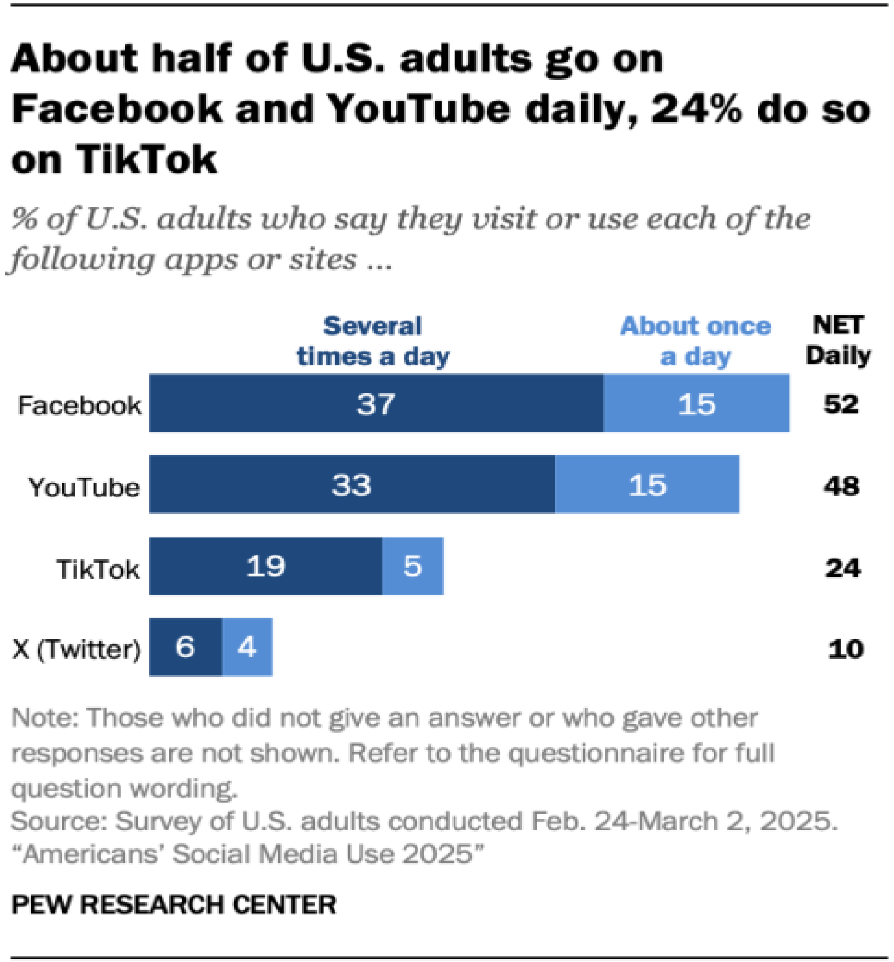
- Assistance Programs only work if customers know they exist and understand how to use them.
- Barriers to participation include:
  - Lack of awareness
  - Complex applications
  - Confusing utility bills
  - Limited digital and utility literacy
  - Difficulty finding trustworthy information

Customer Journey

- Customers interact with many organizations, but they experience one journey. They don’t think in organizational charts.
- They want to know answers to simple questions like:
  - Why is my bill so high?
  - How do I get help paying my bill?
  - How do I lower my bill?
  - Who do I call?
  - What programs am I eligible for?

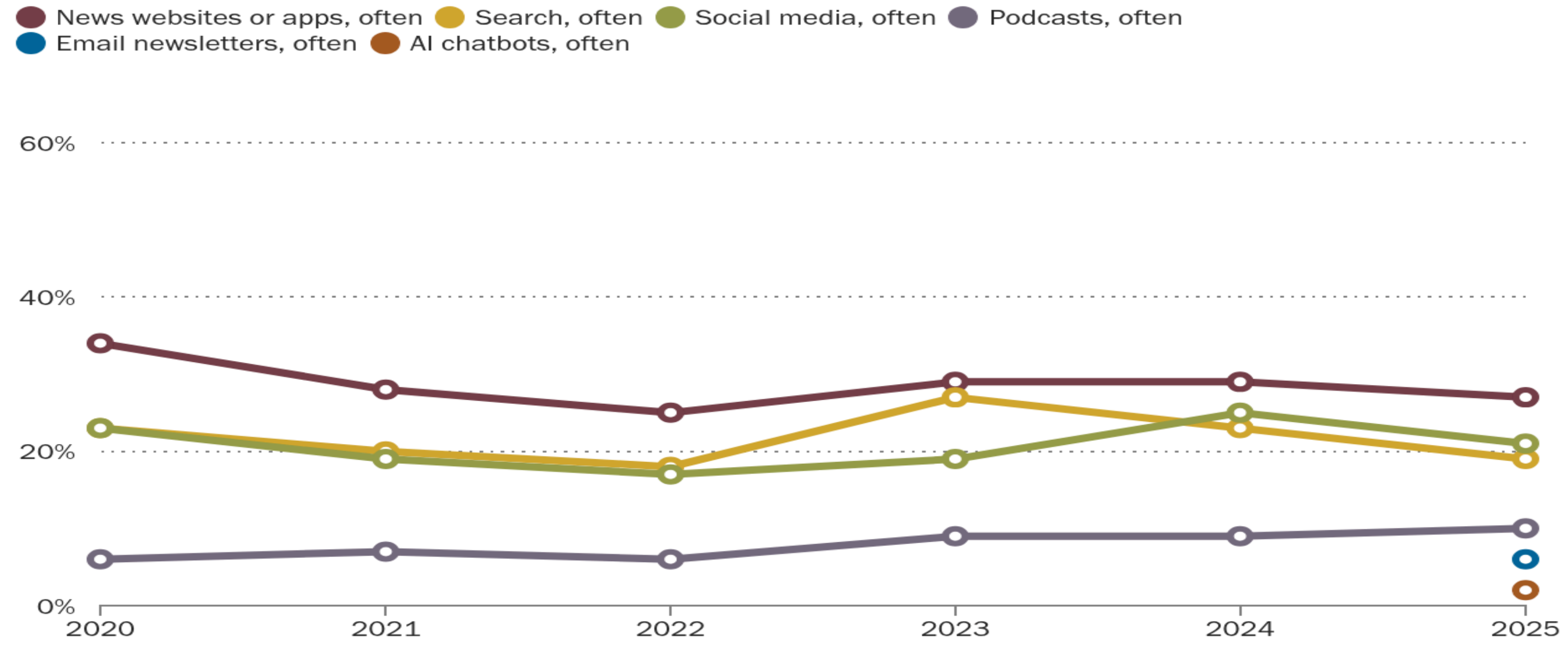
Meeting Customers Where they are

- Where are customers?
  - Online
  - Social Media
  - Mobile Devices
  - Email
  - Paper Mail
  - Community



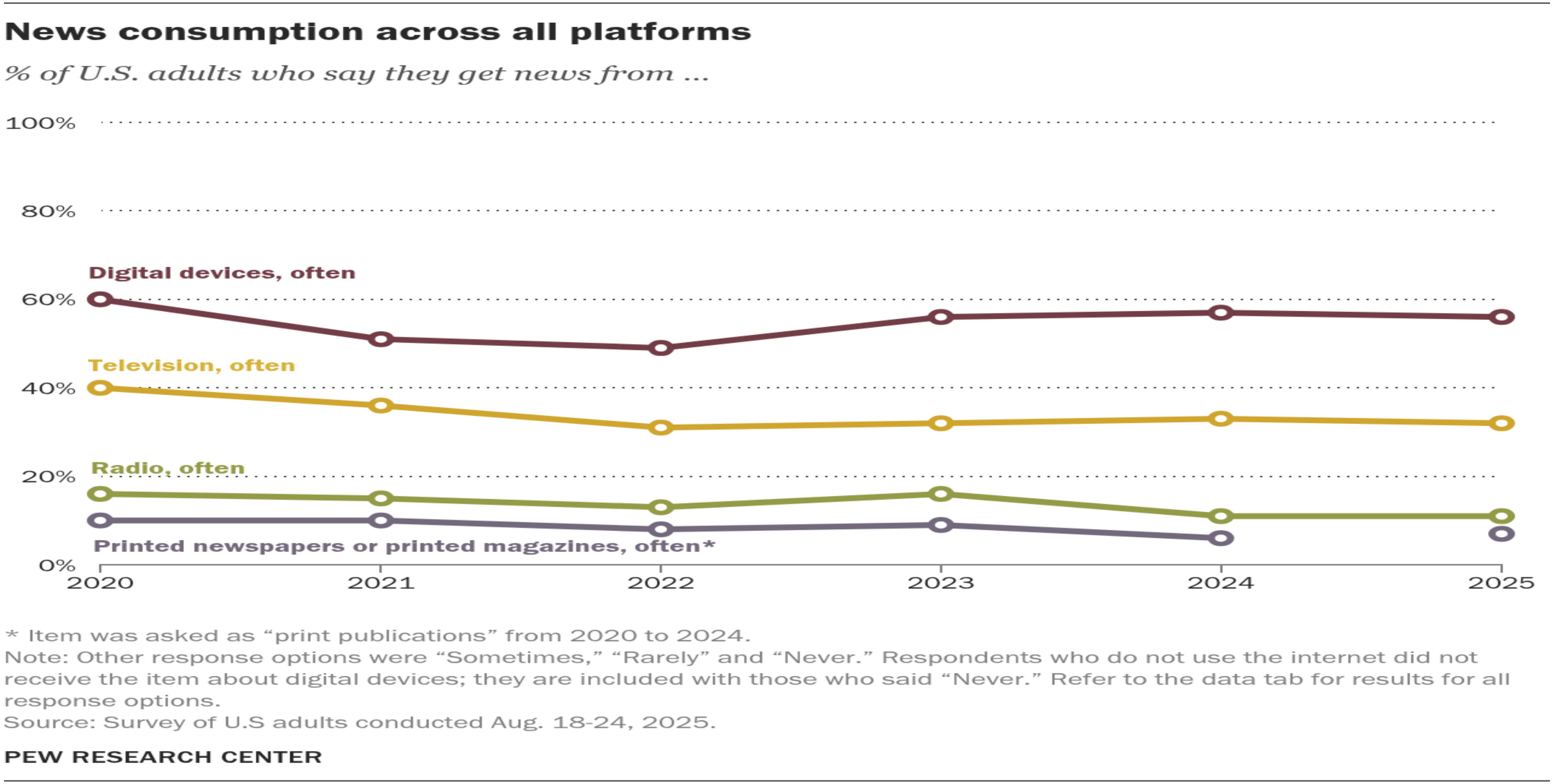
News consumption across digital platforms

% of U.S. adults who say they get news from ...



Note: Other response options were "Sometimes," "Rarely" and "Never." Respondents who do not use the internet did not receive these questions; they are included with those who said "Never," along with those who do not say they get news from digital devices. Refer to the data tab for results for all response options.
Source: Survey of U.S. adults conducted Aug. 18-24, 2025.

PEW RESEARCH CENTER



As of July 2025, **64.35%** of global web traffic originates from mobile devices, up from **~62.5%** in early 2025.

Websites: Building Around Customer Needs

- Make Finding Help Easy!
- Ways to improve:
  - Prominent “Need Help Paying Your Utility Bill?” button
  - Plain language menus
  - Mobile-friendly design
  - Searchable FAQs
  - Step-by-step guidance (written and video)
  - Accessibility compliance

Outreach Beyond the Web

- Go Where Customers Already Are – Not Every Customer Visits a Utility Website
- Expand outreach through:
  - Community Action Agencies
  - Libraries
  - Senior Centers
  - Schools
  - Health Clinics
  - Social Media
  - Bill Inserts

Explain Utility Bills Clearly

- Bills should educate, not confuse
- Most customers only look at and understand “amount due”.
- Opportunities for improvement:

  Simple explanation of:
  - Fixed Charges
  - Variable Charges
  - Fuel Adjustment
  - Seasonal Usage
  - Taxes and Fees
  - Payment Options
- Help customers answer, “What can I actually control?”

Empower Customers to Manage Their Cost

- Help customers understand:
  - Variable Costs: usage and water consumption
  - Time of Use Pricing
  - Payment Plans
  - Budget Billing
  - Energy Efficiency Programs - Weatherization
- Costs they can’t control:
  - Weather
  - Regulatory Charges
  - Infrastructure Investments
  - Taxes

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Use Plain and Consistent Language

- Instead of “income qualified residential assistance” say “you may qualify for help paying your utility bill”
- Instead of “arrearage management” say “help reducing past-due balances”
- Plain language increases:
  - Trust
  - Understanding
  - Program enrollment
  - Customer Satisfaction
- Use grade level tool in Microsoft Word

Make Every Contact Count

- Every interaction is an opportunity to help.
- When customers call about high bills, offer efficiency resources.
- When customers call for payment assistance, screen for additional programs.
- When customers call about shutoff notices, connect them with agencies before disconnection.

Consistency Builds Trust

- Customers receive information from many sources
  - Utilities
  - Government agencies
  - Community organizations
  - Non-profits
  - PSC and other regulators
- Messages should be consistent
  - Shared
    - Definitions
    - Eligibility explanations
    - Program descriptions
  - Consistency reduces confusion

Working Together

- Collaboration Improves Customer Outcomes
- Shared Resources:
  - FAQs
  - Graphics
  - Outreach Campaigns
  - Cross-Training
  - Common Messaging During Emergencies

Measuring Success

- Instead of asking "did we publish the information?", ask...
  - Did customers:
    - Find it?
    - Understand it?
    - Trust it?
    - Use it?

- Measure Success Through:
  - Program Participation
  - Website Navigation
  - Call Center Trends
  - Engagement on Social Media
  - Customer Satisfaction
  - Referral Completion
  - Reduced Disconnections

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Closing

- **When we work together to communicate clearly and consistently:**
  - Customers:
    - Find Help Faster
    - Better Understand Their Bill
    - Feel More Confident
  - Access Assistance Programs
  - Build Trust
- Final Thought

Meeting customers where they are means designing communication around their needs, not around our organizational needs. When we all communicate together, customers are better informed, better supported, and better equipped to manage their utility costs.

Missouri PSC Public Service Commission

Questions?

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Closing

Rich Germinder – MO PSC

Actions Underway and Looking Ahead

- MO PSC is realigning utility assistance oversight and evaluation to a dedicated team on PSC Staff.
  - Customer Experience Department (CXD)
  - Consistent oversight and evaluation across rate cases and utilities

- MO PSC is initiating website redesign and improved communications.
  - Embracing "Meeting Customers Where They Are"
  - Seeking feedback from stakeholders

- MO PSC is working on finding a feasible and sustainable method for the MO PSC, MO OPC, utilities, and stakeholders to collaborate and engage on improving utility assistance beyond the workshop.

- Continued evaluation of ideas and concepts presented in the docket and the workshop as we all try to do things better!

Next Steps

Submit feedback via the docket OW-2026-0085 or email to UAPrograms@psc.mo.gov

Survey on PSC Website redesign will be sent to workshop participants

Thank you for your participation today!