Stakeholder Comments on Low-Income Rate Workshop

Renew Missouri respectfully submits these comments regarding the recent utility affordability workshops hosted by the Missouri Public Service Commission Staff. Renew Missouri is submitting these comments with support from the following groups:

Jenn DeRose, Sierra Club

Edward Bryant, Consumers Council of Missouri

Geoff Marke, OPC

Appreciation for the Commission and Staff

First and foremost, we would like to express our sincere appreciation to the Commission and PSC Staff for the considerable time, thought, and effort invested in organizing these workshops. We are grateful for the opportunity to convene alongside utilities, Community Action Agencies, consumer advocates, policymakers, and other stakeholders to discuss one of the most pressing issues facing Missouri utility customers: energy affordability.

Both the in-person and virtual workshops were highly productive and informative. It was evident that the presenters were selected thoughtfully and brought valuable expertise and diverse perspectives to the discussion. Just as importantly, the workshops created a collaborative environment where participants could openly discuss challenges, identify common goals, and explore innovative solutions. Renew Missouri believes these workshops demonstrated the value of bringing stakeholders together and highlighted the importance of continuing this dialogue.

Request for Quarterly Utility Affordability Workshops and Report Out Document

Meaningful policy improvements require sustained collaboration. Utility affordability is not a static issue, and the economic conditions facing Missouri households continue to evolve. Rising utility costs, housing expenses, healthcare costs, and other financial pressures require continuous evaluation of assistance programs to ensure they remain effective.

Accordingly, Renew Missouri respectfully requests that the Commission direct PSC Staff to host quarterly utility affordability workshops. Continued leadership from Staff is critical to maintaining momentum, fostering collaboration among stakeholders, identifying emerging issues, and evaluating opportunities to improve customer assistance programs.

These workshops would provide an ongoing forum for utilities, Community Action Agencies, consumer advocates, state agencies, and policymakers to discuss program performance and identify opportunities to better serve Missouri's most vulnerable households.

We would also appreciate a report from the Commission summarizing the key takeaways from the workshops and outlining potential next steps. While we understand this is an interactive and ongoing process, having insight into the Commission's perspectives on these affordability issues and the direction it intends to pursue would provide valuable clarity for stakeholders and help inform future engagement.

Lessons Learned from the Workshops

a. The Need is Greater than Ever

Several consistent themes emerged throughout the workshops. First, the need for assistance has never been greater. Community Action Agencies reported that households are exhausting available assistance much earlier in the year than in previous years. Even when families are connected with every available resource, the assistance often falls short of meeting their overall financial needs.

Second, energy affordability cannot be viewed in isolation. Many households struggling to pay utility bills are simultaneously experiencing housing insecurity, rising childcare costs, medical expenses, transportation challenges, and employment instability. These overlapping burdens compound one another and leave many Missouri families in persistent financial distress.

Finally, the volume of need continues to outpace available resources. As a result, it is increasingly important that assistance programs operate as efficiently as possible and prioritize those who are most vulnerable, including older adults living on fixed incomes, households with young children, and individuals with disabilities.

For a comprehensive look at the state of utility affordability in Missouri, please see the attached fact sheet.

b. Improving Program Coordination and Data Sharing

A recurring theme throughout the workshops was the need for greater coordination among assistance programs. Stakeholders consistently identified fragmented eligibility systems as a significant barrier to helping eligible households access available benefits. Applicants often must complete multiple applications, provide the same documentation repeatedly, and navigate differing eligibility requirements across agencies. This creates unnecessary administrative burdens for both applicants and program administrators.

Workshop participants also noted several challenges related to data sharing, including:

- Different data collection methods among agencies.

- Incompatible software systems.
- Client consent requirements that limit information sharing.
- Administrative barriers that prevent efficient coordination between programs.

While these challenges are significant, they are not insurmountable. Other states have demonstrated that integrated eligibility systems, shared intake processes, and coordinated benefit administration can substantially improve access while reducing administrative costs.

Although the Commission's authority is limited to its regulatory responsibilities, we believe the Commission can play an important leadership role by highlighting these issues and encouraging state policymakers to modernize Missouri's utility assistance infrastructure. Utility commissions across the country are leading efforts to improve energy affordability programs. For example, Indiana's Utility Regulatory Commission recently released an affordability report[1] outlining actionable recommendations for regulators, utilities, and legislators—many of which will be considered by the General Assembly. Developing a similar framework in Missouri would be a valuable step toward strengthening energy affordability and support programs statewide.

Specifically, the Commission should consider recommending that Missouri policymakers pursue reforms such as:

- Establishing categorical eligibility so households enrolled in SNAP or (Medicaid) are automatically considered income-eligible for LIHEAP. (There are 12 states that already do this)
- Developing a single online eligibility portal through which residents can apply simultaneously for SNAP, Medicaid, LIHEAP, weatherization assistance, and other utility assistance programs.
- Implementing a universal screening tool with a common intake form to reduce duplicate applications and improve referrals across programs.
- Streamlining eligibility verification by allowing participating agencies to share verified income information with one another and Community Action Agencies whenever permitted by law.

The workshops also exposed the need for longer certification periods for households with stable incomes, particularly seniors and individuals with disabilities who rely on fixed incomes. Several states allow these households to remain eligible for multiple years before recertification. Extending certification periods in Missouri would reduce unnecessary administrative burdens for both applicants and Community Action Agencies while allowing limited staff resources to be directed toward assisting new applicants and households experiencing changing circumstances.

c. Improving Data Collection and Program Evaluation

---

[1] https://www.in.gov/iurc/files/IURC-Energy-Affordability-Report_July-2026.pdf

Throughout the workshops, participants repeatedly discussed the need to balance program effectiveness with administrative efficiency. Every dollar spent on unnecessary paperwork, duplicate eligibility determinations, or inefficient processes is a dollar that cannot be directed toward customer assistance.

Improving coordination between agencies, simplifying eligibility processes, and reducing administrative duplication can help ensure that a greater share of available funding reaches Missouri households in need.

The coalition also encourages the Commission to strengthen data collection related to utility affordability and customer assistance programs. Consistent, statewide reporting would provide utilities with the information necessary to evaluate program effectiveness, identify underserved populations, and measure changes in energy burden over time.

Renew Missouri recommends that utilities be required to report standardized metrics that allow stakeholders to evaluate the effectiveness of utility affordability programs. These metrics should include, at a minimum:

- Customer energy burden.
- Arrearage levels.
- Disconnection rates by census tract.
- Reconnection rates by census tract.
- Participation in customer assistance programs.
- Geographic distribution of assistance aggregated by census tract.
- Household demographics, where appropriate and privacy protections allow.

Additionally, it is recommended that the Commission consider incorporating elements of the Utility Assistance Cost Test presented by Hassan Shaban during the workshop when evaluating the cost-effectiveness of utility assistance programs. Relevant data points include:

- Number of customer service calls.
- Avoided disconnection costs.
- Arrearage carrying costs.
- Debt write-offs.
- Direct program expenditures.
- Administrative expenses tied to utility assistance programs.

Collecting these metrics consistently across utilities would provide a stronger analytical foundation for future policy decisions and help ensure that utility affordability programs deliver measurable benefits to both customers and utilities. In addition to these datasets, we encourage the Commission to explore the development of an internal tool or resource that leverages protected utility data to calculate and analyze customer energy burden and other affordability indicators at the utility level. This approach would be similar to the analysis Spire has conducted to better understand the energy burden experienced by its customers and to inform the design and targeting of its assistance and energy efficiency programs.

**We recognize that some of these data sets are already reported to the PSC.*

Conclusion

Renew Missouri appreciates the Commission's willingness to elevate the conversation around utility affordability and recognizes the significant effort Staff invested in organizing these workshops.

The workshops made clear that Missouri has an opportunity to improve the accessibility, coordination, and effectiveness of its utility assistance programs. Continued stakeholder engagement, improved data collection, streamlined eligibility processes, and stronger coordination among state agencies can help ensure that limited assistance resources reach the households that need them most.

Renew Missouri looks forward to continuing to work collaboratively with the Commission, PSC Staff, utilities, Community Action Agencies, and other stakeholders to advance practical, data-driven solutions that improve energy affordability for all Missourians.

**Note: Please see the attached fact sheet written by Renew Missouri that summarizes the state of energy affordability in Missouri.*

FACT SHEET
UTILITY AFFORDABILITY IN MISSOURI

WHY ENERGY AFFORDABILITY MATTERS

Energy affordability remains a growing challenge in Missouri, with rising arrearages, increasing disconnections, and persistently high energy burdens among low-income households. Current assistance programs—both federally funded and utility-administered—are insufficient to meet the scale and complexity of need.

Many programs fail to consider a household's actual ability to pay, relying instead on broad income thresholds that do not reflect real-world energy costs. As a result, the current state of assistance is misaligned with the current state of

DEFINITION

Energy affordability is typically understood as a condition in which, after paying utility bills, households still have enough income to cover other livelihood essential needs such as housing, transportation, food, and healthcare. However, many existing assistance and discount programs fail to account for a household's actual ability to afford its energy usage.

CURRENT TRENDS IN UTILITY AFFORDABILITY[1]

Utility affordability is not improving:

- Missouri IOU customers owed over $1.039 billion in arrearages to investor-owned utilities in 2024.
- Arrearages increased to $1.336 billion in 2025.
- Between 4.4% and 35%[2] of customers were in arrears in 2024, with most utilities reporting 15–20% of customers carrying past-due balances.
- Missouri ranked 15th in the country in electricity disconnection rate, and 13th in total electric disconnections.

Utility disconnections have increased significantly:

- More than 600,000 Missouri customers were disconnected between 2021 and 2025 (excluding 2023 due to unavailable data).
- This represents a 21.6% increase in disconnections over that period.

Gas customers face particularly high affordability challenges:

- Nearly 30–37% of Spire customers carried past-due balances.
- Gas utilities often experience higher bill volatility due to fluctuations in fuel prices.

Seasonal trends contribute to disconnections:

- Disconnections typically spike in September and October.
- Contributing factors include:
  - Accumulated summer cooling costs
  - Expiration of hot weather shutoff protections
  - Utilities disconnecting customers before winter moratoriums begin.

In 2025, Ameren disconnected 92,834 customers. Given the estimated number of Ameren customers in 2025, this represents a disconnection rate of approximately 8.4%. Spire serves approximately 1.1 million customers and disconnected 44,443 customers, or about a 3.9% disconnection rate. Evergy's disconnection rate is approximately 5.8% and Summit 3.6%.

UTILITY DISCONNECTION RATES BY UTILITY COMPANY IN 2025[3]

Utility[4]	# of Reported Disconnections in 2025	Estimated # of Customers in 2025[5]	Rate
Ameren	92,834	1,100,823	8.4%
Evergy	33,889	578,320	5.8%
Spire	44,443	1,131,880	3.9%
Summit	583	15,974	3.6%

LIHEAP LIMITATIONS

LIHEAP reaches only a small share of eligible households:

- About 16% of income-eligible households receive assistance.
- Although more than 34 million households qualified in 2023, only 5.4–5.9 million received benefits due to limited federal funding.[6]

LIHEAP benefits have not kept pace with rising energy costs:

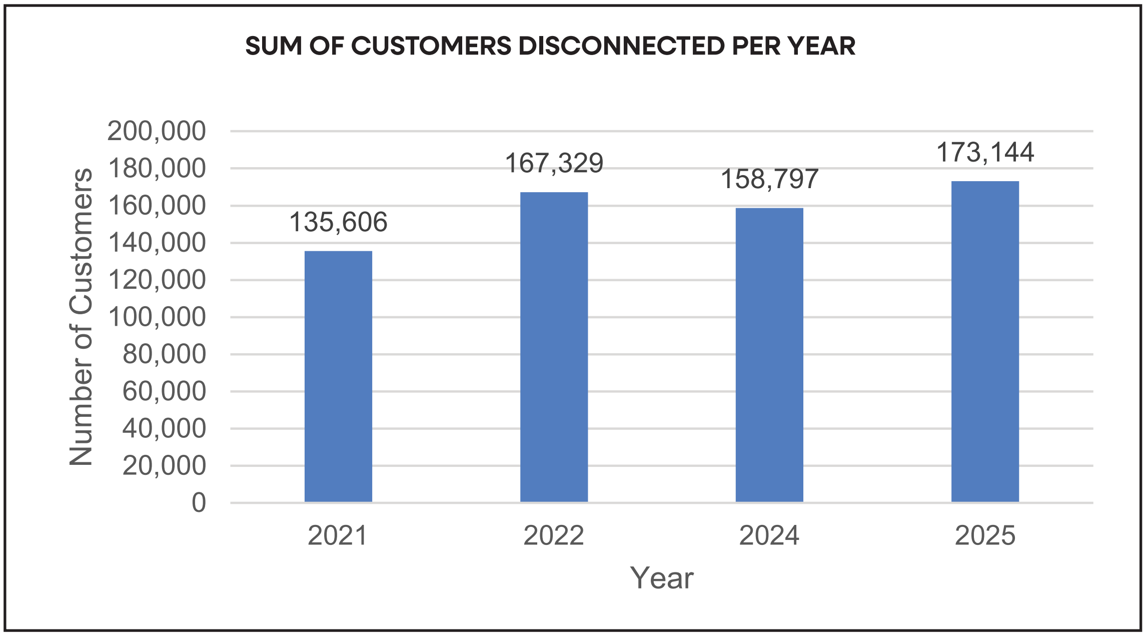
- Average benefits have declined by 26% since 1981 when adjusted for inflation.
- Meanwhile, average U.S. electricity rates have increased by 66% since 1985.[7]

A NOTE ABOUT ENERGY BURDEN

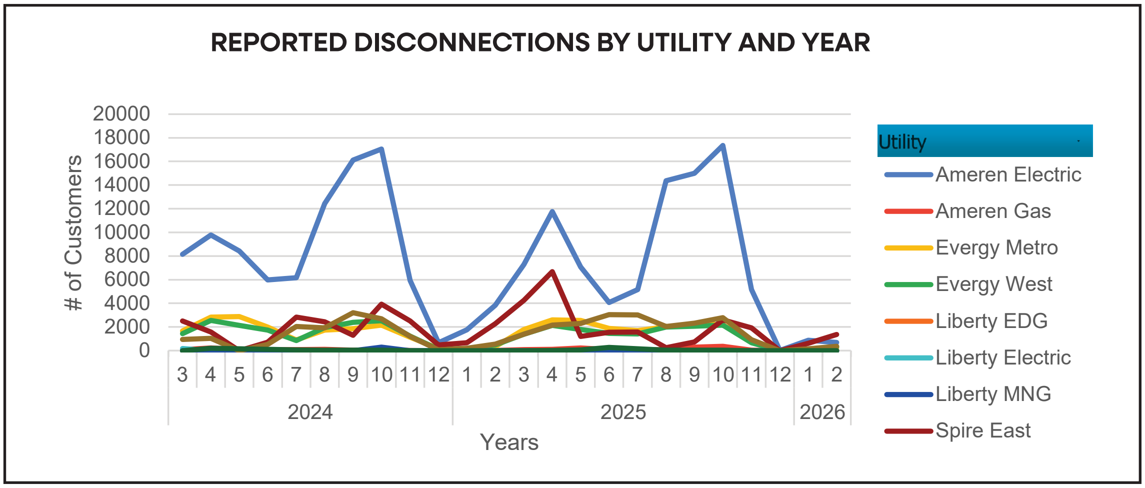
Energy burden remains a key metric for assessing how customers are faring in terms of utility affordability. The higher a household's energy burden, the less income it has available for other essential needs. In 2022, more than 78,500 households in the St. Louis Metropolitan Area had an energy burden of 10% or more, highlighting the scale of the challenge.[8]

In the St. Louis Energy Burden Report, there are broad trends across communities, showing that metrics such as health outcomes, geographic location, and race, play a significant role in energy burden. Aggregate data from Renew Missouri's Energy Burden Explorer dashboard highlights that nearly two-third of households in the St. Louis metro area with high energy burden are located in St. Louis City, showing stark differences amongst neighborhoods.

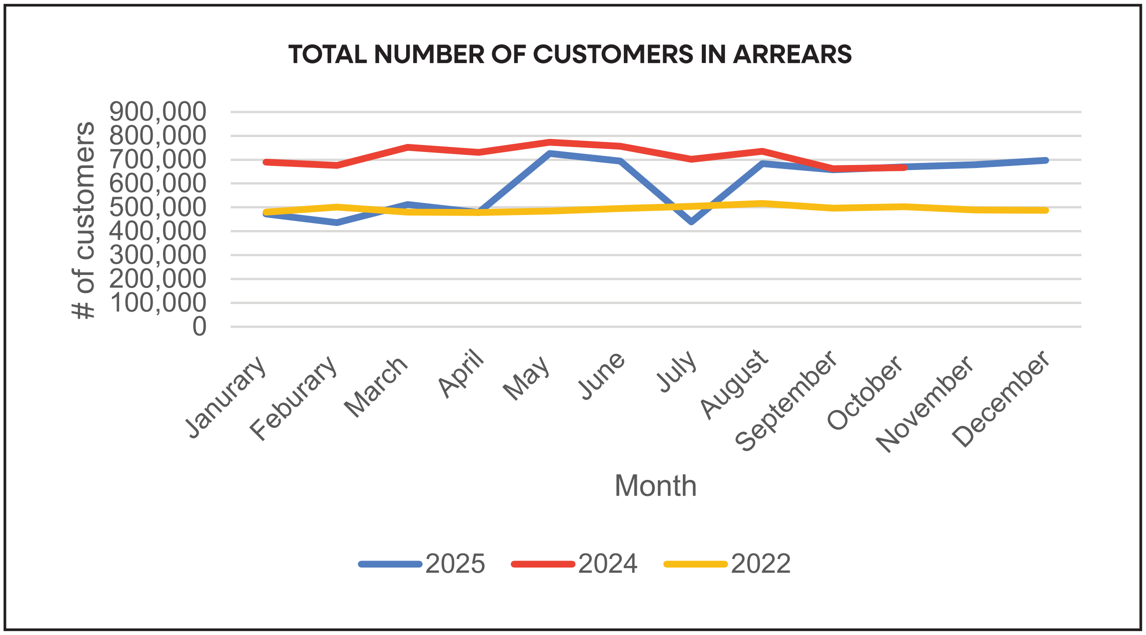
ARREARAGE AND DISCONNECTION GRAPHS



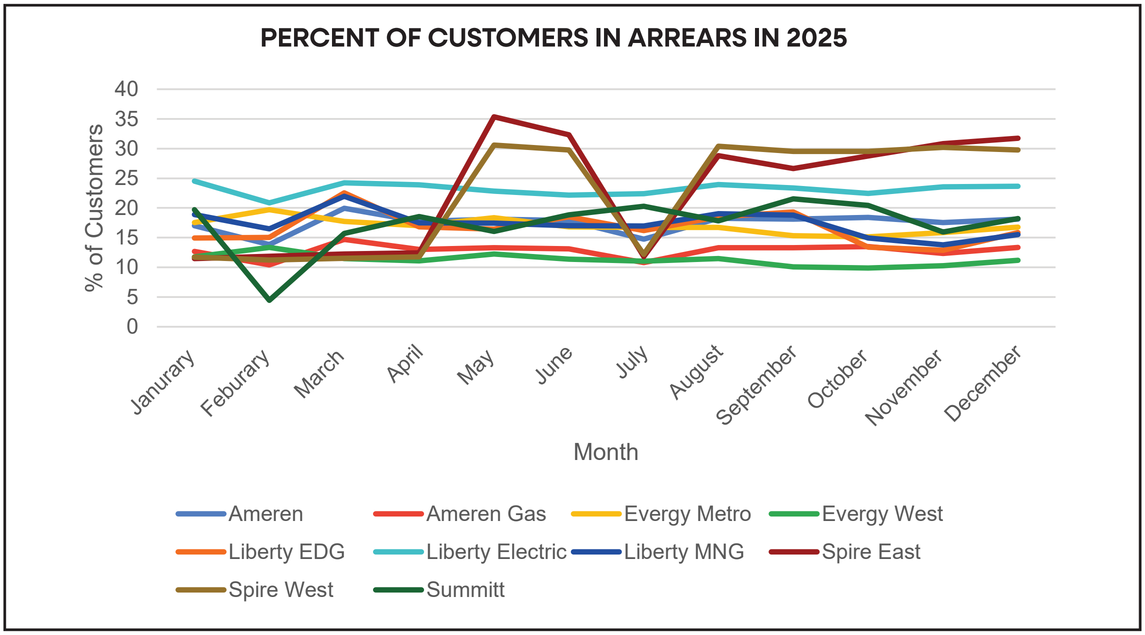
This graph shows the sum of customers disconnected per year for utilities that reported their disconnection rates to the PSC. The utilities include Ameren Gas, Ameren Electric, Evergy Metro, Liberty



This graph shows the number of customers disconnected by utility from 2024-2026.



This graph shows the total number of customers in arrears in 2025, 2024, and 2022. The utilities include Ameren Gas, Ameren Electric, Evergy Metro, Liberty EDG, Liberty Electric, Liberty MNG, Spire East, Spire West, and Summit.



This graph shows the percentage of customers in arrears in 2025 by utility.

Endnotes

1 Methodology for calculating the following numbers was sourced from data the utilities supplied in following Commission Rule 20 CSR 4240-13.075(6) and include reporting utilities: Ameren Gas, Ameren Electric, Evergy Metro, Liberty EDG, Liberty Electric, Liberty MNG, Spire East, Spire West, and Summit. The 2024 arrearage total was calculated by summing monthly arrearage amounts for these utilities from March through December, as January and February data were not reported. The 2025 total includes reported data for all months, January through December. Arrearges in 2025 for March through December is $1.110 billion. This is still an increase from the previous year.

2 The percentage of customers with arrearages was calculated by dividing the number of customers in arrears by the 'meters at the end of the month' for each month reported. Data from 2019 to 2022 is sourced from docket AW-2020-0356. 2023 data unavailable due to two separate disconnection reporting requirements.

3 Liberty/Empire was not included in this list due to lack of available disconnection data.

4 The utilities included in this calculation are Ameren + Ameren Gas, Evergy Metro + Evergy West, Spire East + Spire West, Summit

5 The disconnection rate was calculated by adding each utility's monthly disconnected numbers and dividing it by the average number of cusomters in 2025 for that utility. The estimated number of customers is an average number of meters reported at the end of the month in that year.

6 https://acf.gov/ocs/fact-sheet/liheap-fact-sheet

7 Pacyniak, G., 2022. Keeping all the lights on: a roadmap to affordable, universal electricity service in the clean energy transition. Ecol. Law Q. Forthcom. UNM Sch. Law Res. Pap. 2022-24.

8 Data is pulled from Greenlink GEM Data Mapping Tool: https://www.greenlinkanalytics.org/gem