BEFORE THE PUBLIC SERVICE COMMISSION
OF THE STATE OF MISSOURI

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

Comments of Promise

SUBMITTED AUGUST 21, 2026

Promise submits these comments in response to Attachment A of the Commission's March 26, 2026 Order, through the public comment period open through August 31, 2026. Promise is a technology company headquartered in Oakland, California. Promise does not fund assistance or set eligibility policy, and takes no position on funding levels, rate design, or any contested matter between parties.

Promise's role in administering assistance programs

Promise operates the application intake, document verification, and enrollment infrastructure behind assistance programs for state agencies and utilities nationwide. Recent examples of Promise's work include as the sole administrator for the New York Enhanced Energy Affordability Program (a PSC-mandated, income-qualified discount program provided by all 9 IOUs in NY state), as the backbone technology provider for LIHEAP in Florida (contracted by FL COMMERCE), and as a data matching and targeted outreach provider encouraging Kansas Evergy customers to apply for LIEAP. In addition to administering assistance programs, Promise also works directly with dozens of utilities to administer payment assistance, payment plan, and arrearage management programs for public and investor-owned water utilities, among them WSSC Water, Arkansas Water, Veolia, Connecticut Water, Baltimore City Department of Public Works, and Greater Cincinnati Water Works. Promise has worked on federally funded assistance programs since 2022 and on utility-administered programs since 2020.

Promise's software platform facilitates these programs. Intake and first pass eligibility determinations are performed by software rather than by assigned caseworkers. The platform receives and structures the application, reads and validates submitted documents, matches against authoritative data sources where the administering entity has authority to permit it, applies that entity's eligibility criteria to the verified record, detects duplicates and anomalies, and creates the audit record. Human review is exception-based, reserved for failed document validation, failed or conflicting data matches, flagged anomalies, applicants falling outside the standard criteria, and applicants requesting help. Those cases go to the administering utility or agency's staff, who set the eligibility criteria, hold determination authority, decide denials, and handle appeals. Promise instruments the process and reports to each partner on completion rate, drop-off by step, time to determination, and share of applications requiring manual review.

Promise is glad to provide fuller detail on any of these programs, including contract history, application volumes, staffing, and program-level strengths and weaknesses, on request or as a supplemental filing.

Response to Part B: Stakeholder Information Request

B.1.D AND B.1.E

Factors limiting the effectiveness of current designs, and modifications that could close identified gaps.

A Missouri household seeking help with utility bills generally establishes its eligibility more than once. A household served by an electric utility and a gas utility, already receiving state assistance, may prove the same income and the same household composition separately to each, in a different format each time, after the State has already made that determination on better data than either utility holds. The second and third proofs add nothing to accuracy. What they add is attrition, and the attrition falls hardest on the households with the least time, transportation, and administrative capacity.

The remedy is a common application across Missouri's investor-owned utilities, built on categorical eligibility. A household enrolled in HEAP, SNAP, Medicaid, SSI, or TANF has already been verified by a state agency with direct access to income and household data. Treating that determination as sufficient for utility assistance eliminates the household's application rather than shortening it, which matters because every step in an application sheds a portion of the eligible households that begin it, and removing the application removes the most. Ameren Missouri, Evergy Missouri Metro, Evergy Missouri West, Spire, Missouri American Water, Liberty Utilities, and Summit Utilities each maintain separate programs with separate eligibility processes and separate documentation today. A common application and a common eligibility basis across them would resolve most of that fragmentation without changing any utility's program budget.

B.2.C

Effectiveness of automatic enrollment.

New York demonstrates that this operates across many utilities at once. Promise supports the New York Energy Affordability Program across nine investor-owned utilities, and those utilities share one application and one eligibility basis. The New York Public Service Commission directed the state's major electric and gas investor-owned utilities to establish Energy Affordability Programs, with eligibility triggered by receipt of a HEAP benefit regardless of fuel or benefit type and later expanded to other public assistance programs, and it standardized discount levels across utilities so a customer's benefit does not depend on which company serves them. Enrollment then happens without the household acting: the discount applies automatically when a HEAP grant posts to the account, and for a household receiving HEAP through a different utility, enrollment occurs through a file match with the State Office of Temporary and Disability Assistance. Enrollment also carries forward on its own, since participating utilities are required to place enrolled customers into budget billing with an opt-out, and affordability enrollment serves as the eligibility gate for additional statewide bill credit programs.

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> The number of utilities is the point Promise would emphasize for Missouri. Nine separate companies, with nine different billing systems, nine different service territories, and nine different customer bases, run off one application. The technical and legal work of getting there is real, and it has been done.

B.3.A

Administrative practices that reduce customer burden across application, verification, and recertification.

One application should not lead to one outcome. Households arrive in different circumstances and a single answer serves them badly. A household with a temporary shortfall and an otherwise affordable bill needs a payment plan and generally completes it. A household whose ongoing bill exceeds what its income can carry does not need a payment plan; offering one sets up a second failure and returns the household to the same place with a larger balance. That household needs LIHEAP, an affordability rate, arrearage forgiveness, or a combination, and it needs weatherization more than any of them. Promise recommends that a common application assess the household once and route to what actually fits, rather than enroll everyone in whichever program the household happened to find. Promise makes this point against its own product interest, since payment plans are its core business and this recommendation reduces the share of households for whom a payment plan is the right answer.

The same assessment should govern recertification, which is where programs lose households they have already stabilized. A household paying reliably for a year is dropped for failing to return a form and returns months afterward through crisis assistance with a larger balance than it had when enrolled. Recertifying by match against continued participation in the qualifying program, with household action required only where the match fails, holds those households in place.

B.3.B AND B.4.B

Design elements that reduce administrative workload, and metrics for evaluating outreach effectiveness.

The households these programs serve reach the internet through a phone. Many have no home broadband, no computer, no printer, and no scanner, and a portion are on metered data. A process assuming a desktop, a printed form, or a scanned attachment excludes them by design rather than by intent. Promise builds for that constraint. The application arrives as a text message carrying a direct link, opens on mobile web with no download and no account creation required to begin, accepts documents as photographs taken with the phone camera, validates them automatically and says so immediately when an image is unreadable rather than mailing a rejection weeks later, and saves progress so an application interrupted by a missing document is not lost.

Text is also the channel that reaches this population when outreach begins, since mail to a delinquent account has low effective reach and email is read inconsistently by households using a phone as their primary device. Text outreach carries a specific obligation. Utility customers are targeted by disconnection scams and are right to treat an unfamiliar message about their bill as fraud, which makes consistent sender identity, clear utility branding, a utility-hosted destination, and coordination with the utility’s call center necessary rather than preferable. Promise also recommends the Commission treat contact data quality as a distinct and measurable problem, because contact information on delinquent accounts is disproportionately stale and no program reaches a household whose phone number is wrong.

Enrollment is not the outcome. Sustained payment is, and this is where reminders matter. Scheduled text reminders ahead of a due date, and ahead of a recertification deadline, are among the few low-cost interventions that measurably change completion. In Promise's work with the Baltimore City Department of Finance on residential payment plans, plan completion moved from approximately six percent to approximately ninety percent after enrollment moved to a mobile channel with text reminders. Promise offers this as evidence that the gap between enrollment and completion is frequently a function of process design rather than household willingness.

Self-service does not serve every household, and Promise operates a supported channel for those it does not reach. Households without a phone, without connectivity, with a disability, with limited literacy, or with limited English need a person, and a portion of customers will not respond to electronic outreach under any circumstances. Promise staffs a call center path for applicants who cannot complete an application on their own, and language parity extends across the application, the notices, the reminders, and that support rather than the application alone. Digital enrollment should be understood as freeing staff capacity for the households that need human help, not as replacing that capacity.

All of this should be visible while it can still be acted on. Promise provides the administering utility or agency a dashboard showing application queue and aging, drop-off at each individual step, the distribution of reasons applications route to manual review, enrollment and completion by channel and language, and cost per completed enrollment by channel. A paper process rarely reveals where applicants give up. A digital one identifies the exact step, which lets the administering entity fix the specific barrier rather than guess at it, and gives the Commission a reporting basis on which to evaluate whether a program is working. Promise recommends that whatever design the Commission adopts, the reporting requirements be specified at the outset, since a baseline not captured before implementation cannot be reconstructed afterward.

B.3.C AND B.7

Strategies from other jurisdictions, and implementation challenges to anticipate.

Data sharing between state agencies and utilities is the hardest part of this work, and Promise will not represent otherwise. Determining what a utility and a state agency may lawfully exchange, and under what authority, routinely takes longer than building the connection that exchanges it, and it involves parties with different governing statutes, different privacy obligations, and no established habit of working together. It is also the part that makes everything else possible, since without it the household remains the transport mechanism between two entities capable of exchanging the data directly.

Promise has done this successfully in other states, and offers that experience to the Commission. Promise has established and operated data sharing between state agencies and utilities in New York, where the OTDA file match drives affordability enrollment across nine utilities, and holds direct state agency experience through its work with the Mississippi Department of Human Services on SNAP verification. Promise is familiar with the legal questions that arise, the sequence in which they are best resolved, and the practical shape of the agreements that result, and is accustomed to sitting between a state agency and a utility and holding that conversation productively. Promise would make that experience available to the Commission, Staff, the Department of Social Services, and Missouri's utilities in whatever form is useful, without regard to whether Promise has any commercial role in what follows.

Two further implementation notes. Enrollment will exceed historic uptake, because removing access barriers surfaces eligible households previously deterred, and a program funded to its historic enrollment will exhaust its funds sooner than projected. And pre-implementation completion rates, determination times, and error rates should be captured before any change is made, since a program that does not record them cannot afterward demonstrate what it improved.

Promise appreciates the opportunity to contribute to the record and is available to respond to questions from Staff, to provide additional detail on any program described above, and to facilitate direct contact with the utilities and agencies that administer them. Promise would welcome participation in any further workshop the Commission convenes.

Respectfully submitted,

Carter Cross
Promise

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Submitted in File No. OW-2026-0085 via the Commission’s public comment form, referencing related submission number OW-2026-0085.