Exhibit No. 300

Consumers Council – Exhibit 300
Jacqueline A. Hutchinson
Direct Testimony
File No. ER-2022-0337

Exhibit No: ________________

Issue(s):

- Energy Bill Affordability
- Keeping Current Program
- Fixed Customer Charge
- Reconnect/Late Fees
- Opt-Out Rate Plans
- Protections for Low-Income and Medically Vulnerable Customers

Sponsoring Party:
Consumers Council of Missouri

DIRECT TESTIMONY OF

JACQUELINE A. HUTCHINSON

Case No. ER-2022-0337

Filed: January 23, 2023

Q. PLEASE STATE YOUR NAME, OCCUPATION, AND BUSINESS ADDRESS.

A. My name is Jacqueline A. Hutchinson, and I am the Director of Advocacy for Consumers Council of Missouri ("Consumers Council"). My business address is 3407 S. Jefferson Ave., Saint Louis, MO 63118.

Q. WHAT ARE YOUR QUALIFICATIONS AND EXPERIENCE?

A. I have a BS degree in Business Administration from Washington University in St. Louis, and a MS degree in Urban Affairs and Policy Analysis, from Southern Illinois University in Edwardsville, IL.

My career spans more than forty years with Community Action Agencies (CAA's) in the state of Missouri. I have been responsible for the implementation of Federal, State, and private donation fuel assistance and homeless prevention programs in the St. Louis area. Those programs include Low-Income Home Energy Assistance Programs (LIHEAP) and Community Services Block Grant (CSBG) programs in the St. Louis area. I have worked with low- and moderate-income consumers who cannot afford to pay their utility bills. After retirement from my long career with community action, I joined Consumers Council as staff in 2020. I am currently the Director of Advocacy for Consumers Council.

I have also been actively involved in energy policy issues and advocacy for low-income consumers on a local, state, and national level for more than 30 years. Over my career, I have participated as a presenter in numerous educational seminars and conferences focusing on utility issues and how those issues impact consumers, particularly vulnerable consumers.

Q: HAVE YOU TESTIFIED PREVIOUSLY BEFORE THE MISSOURI PUBLIC SERVICE COMMISSION?

A. I have provided testimony on behalf of low-income Missourians in almost every Missouri Public Service Commission ("Commission" or "PSC") general rate case impacting the St. Louis area since 1987.

Q. CAN YOU EXPLAIN MORE ABOUT YOUR EXPERTISE, AS IT RELATES TO THIS PSC MATTER?

A. Most notably my expertise includes the following:

Cold Weather Rule and Affordability Plans

I have provided testimony and/or been a part of negotiations in every Cold Weather Rule proceeding in Missouri, including the rulemaking case that initially created that rule. I have reviewed affordability plans with tiered credits, and low-income rates that have been proposed in other states, and have recommended that the best of such plans be implemented through rate case proceedings in Missouri. I have participated in settlement negotiations with various utilities, worked with Missouri Public Service Commission (Staff), the Office of the Public Counsel (OPC), and nonprofit advocates to develop viable low-income affordability programs, as well as programs that are designed to protect consumers who are vulnerable due to serious medical conditions.

Governor's Energy Policy Council

In 2003, I was appointed by Governor Bob Holden to the Missouri Energy Policy Council. The initial focus of the Council was to prepare a state report focusing on three key areas: an analysis of Missouri's current and future energy supplies and demand and impact on low-income consumers; an analysis of the impact on Missouri of standard market design rules proposed by the Federal Energy Regulatory Commission; and recommendations regarding how Missouri state government could demonstrate leadership in energy efficiency.

The PSC Cold Weather Rule and Long-Term Energy Affordability

I was an appointed member of the Cold Weather Rule and Long-Term Energy Affordability Task Force set up in Case No. GW-2004-0452. I worked with this group to establish agreed upon modifications to the Cold Weather Rule in 2004 that provided additional protections to disabled and low-income families and set standards for low-income energy affordability programs.

Q. FOR WHOM ARE YOU PROVIDING TESTIMONY IN THIS PROCEDURE?

A. I am providing testimony for Consumers Council of Missouri ("Consumers Council"), a nonpartisan, nonprofit corporation. Consumers Council works to build a more inclusive and equitable community through coalition building, collaboration, community education and empowering consumers statewide, and advocating for their interests.

Q. WHAT TESTIMONY DO YOU OFFER IN THIS CASE?

A. Consumers Council of Missouri opposes the increase in electric utility rates, as requested by Ameren Missouri in this case. On the heels of the 2022 Ameren increase, any rate increase at this time could significantly impact health and safety for vulnerable families already struggling to meet their basic needs.

The COVID-19 pandemic is still having a great financial impact on area families. It is now being combined with crippling inflation, causing increased in the cost for basic needs such as food, medication, fuel, and housing costs.

Q. WHAT IS THE IMPACT OF HIGH ENERGY BURDEN IN MISSOURI?

Energy burden has been widely studied across this country with similar conclusions.

According to the December 2022 Harvard University Joint Center for Housing Studies report, *Energy Insecurity Threatens to Destabilize Households this Winter,* "As winter approaches in the United States, many households are preparing for lower temperatures—and now, higher energy prices driven by the increased price of natural gas. These price increases are coming as more than one-quarter of US households were already struggling with energy insecurity, a share that stands to grow given the other challenges to affordability posed by inflation and high housing costs."

In the first year of the pandemic, 27 percent of households reported some form of energy insecurity, according to the most recent data from the Residential Energy Consumption Survey (RECS). (Attachment 1 to this testimony). Energy insecurity was especially high for lower-income households, renters, and householders of color. Fully 52 percent of households that earned less than $20,000 in 2020 experienced energy insecurity that year.

Two-fifths of all renter households experienced energy insecurity, compared to one-fifth of all homeowner households. The highest shares of households experiencing energy insecurity by race and ethnicity were among non-Hispanic Black householders (52 percent) and American Indian householders (52 percent), followed by Hispanic householders (47 percent). Energy insecurity rates were lower but still substantial for Asian householders (25 percent) and non-Hispanic white householders (20 percent)."

Q. WHAT ARE THE IMPACTS OF POVERTY AND INFLATION ON MISSOURI CUSTOMERS?

A. Poverty in Missouri, coupled with a 7% rate of inflation, has increased the number of vulnerable customers who are unable to meet their basic needs.

13% of all Missourians live below the poverty index of $23,000 per year for a family of 3.[1] Many other households with low wage jobs are struggling to make ends meet and are experiencing high energy burdens. Additionally, the rising costs of food, gas and other essentials over the past year have added economic stress to the family budget.

The 2021 Home Energy Affordability Gap Missouri report, released April 2022, stated:

> Home energy is a crippling financial burden for low-income Missouri households. Missouri households with incomes of below 50% of the Federal Poverty Level pay 29% of their annual income simply for their home energy bills. Home energy unaffordability, however, is not only the province of the very poor. Bills for households with incomes between 150% and 185% of Poverty take up 7% of income. Missouri households with incomes between 185% and 200% of the Federal Poverty Level have energy bills equal to 6% of income.[2]

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[1] Roger Colton, 2022 Home Energy Affordability Gap.

[2] Roger Colton, 2021 Home Energy Affordability Gap.

> In comparison, the average energy burden for those at the state median income in Missouri is 3% of their income.
>
> The number of households facing unaffordable home energy burdens is staggering. According to the most recent five-year American Community Survey, nearly 145,000 Missouri households live with income at or below 50% of the Federal Poverty Level and face a home energy burden of 29%. And nearly 189,000 *additional* Missouri households live with incomes between 50% and 100% of the Federal Poverty Level and face a home energy burden of 16%. In 2021 the total number of Missouri households below 200% of the Federal Poverty Level stayed relatively constant from the prior year.[3]

The Home Energy Affordability Gap in Missouri, the difference between what customers can afford to pay and what they are actually billed, exceeded $765 billion in 2021, up from $630 billion in the previous year.[4]

Q. WHAT ARE THE ONGOING IMPACTS OF COVID-19 IN COMMUNITIES?

A. Missouri's elderly and disabled residents continue to have increased health risks due to COVID-19, in addition to the rising cost of all other household necessities. Any boost in their household utility costs dramatically increases the "heat or eat" decisions that many Missouri residents are already making at an alarming rate.

A recent review of current literature on the impact of COVID-19 disruption to family functioning and well-being demonstrates that the pandemic disproportionately impacted lower-income families, families from ethnic minority and vulnerable groups, and women.[5]

Both couple and family well-being and relationships are impacted in a variety of ways because of financial stress (citations omitted), and the pandemic has had a significant

[3] Roger Colton, 2021 Home Energy Affordability Gap.

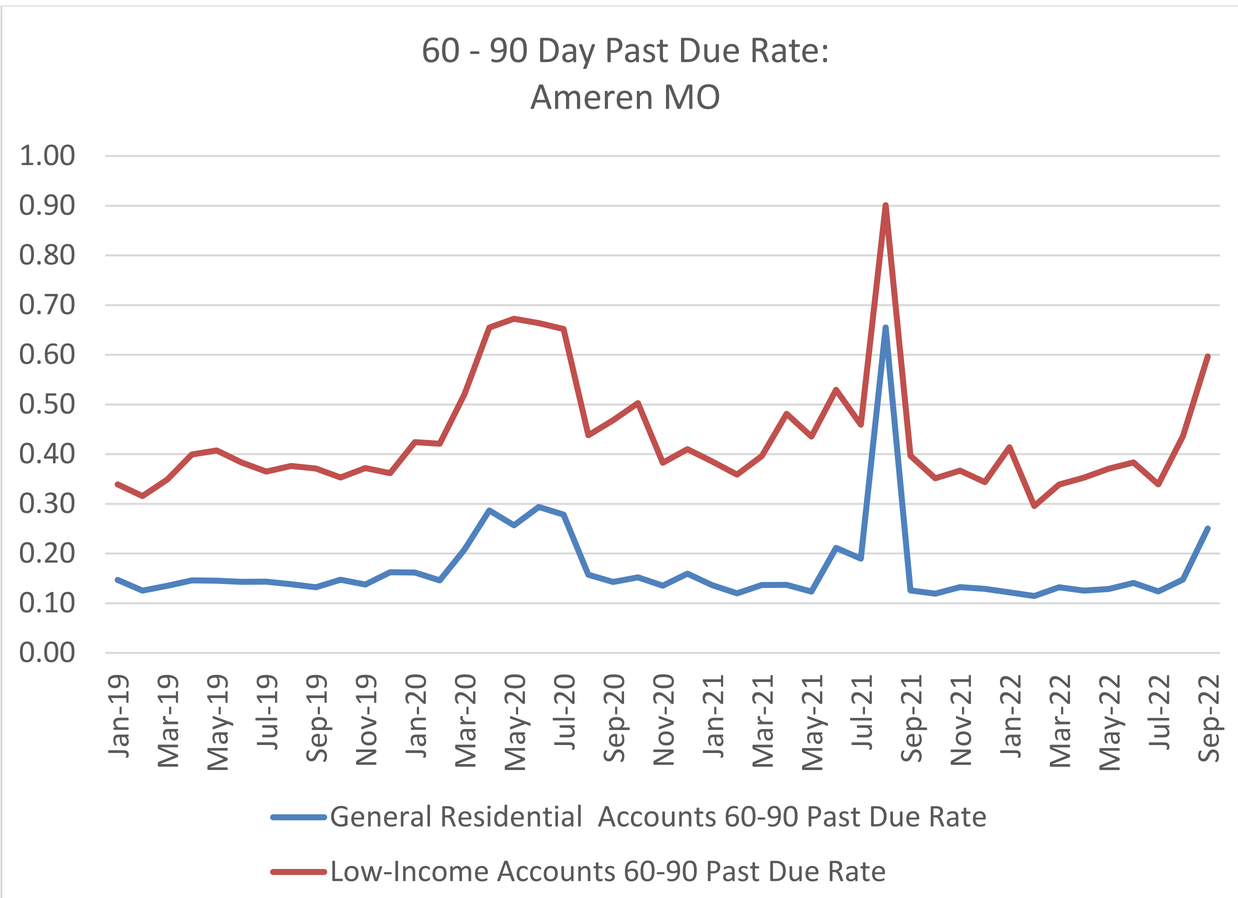
[4] HEAG Fact Sheet, Roger Colton (2022). Also attached to this testimony as Attachment 2.

[5] Andrade, C., Gillen, M., Molina, J., and Wilmarth, M. (2022) "The Social and Economic Impact of Covid-19 on Family Functioning and Well-Being: Where do we go from here?", *Journal of Family and Economic Issues* 43 (205-212).

impact on finances and relationships." Id. at 208. "The financial impacts of COVID-19 in Spring of 2020 led to fear and uncertainty regarding emergency savings, job security, income fluctuations, ability to pay utilities, and housing expenses, as well as broader concerns over the financial markets (citation omitted)." Id. "While the labor market has shown signs of improvement since the beginning of the pandemic and the immediate financial stressors have eased somewhat, it is longer-term impacts that are still concerning for many. As the pandemic lingers, financial concerns have become less pressing as compared with the early months of 2020, but many still worry about their basic needs. This is more prevalent among lower-income households and those with job or wage losses (citation omitted). The recovery appears to be having unbalanced outcomes, likely having longer and more negative effects for those who were already experiencing poverty prior to COVID-19." Id. at 209.

Q. WHAT CAN BE LEARNED ABOUT THE IMPACT OF UTILITY PRACTICES POVERTY ON IDENTIFIED LOW-INCOME CUSTOMERS OF AMEREN MISSOURI?

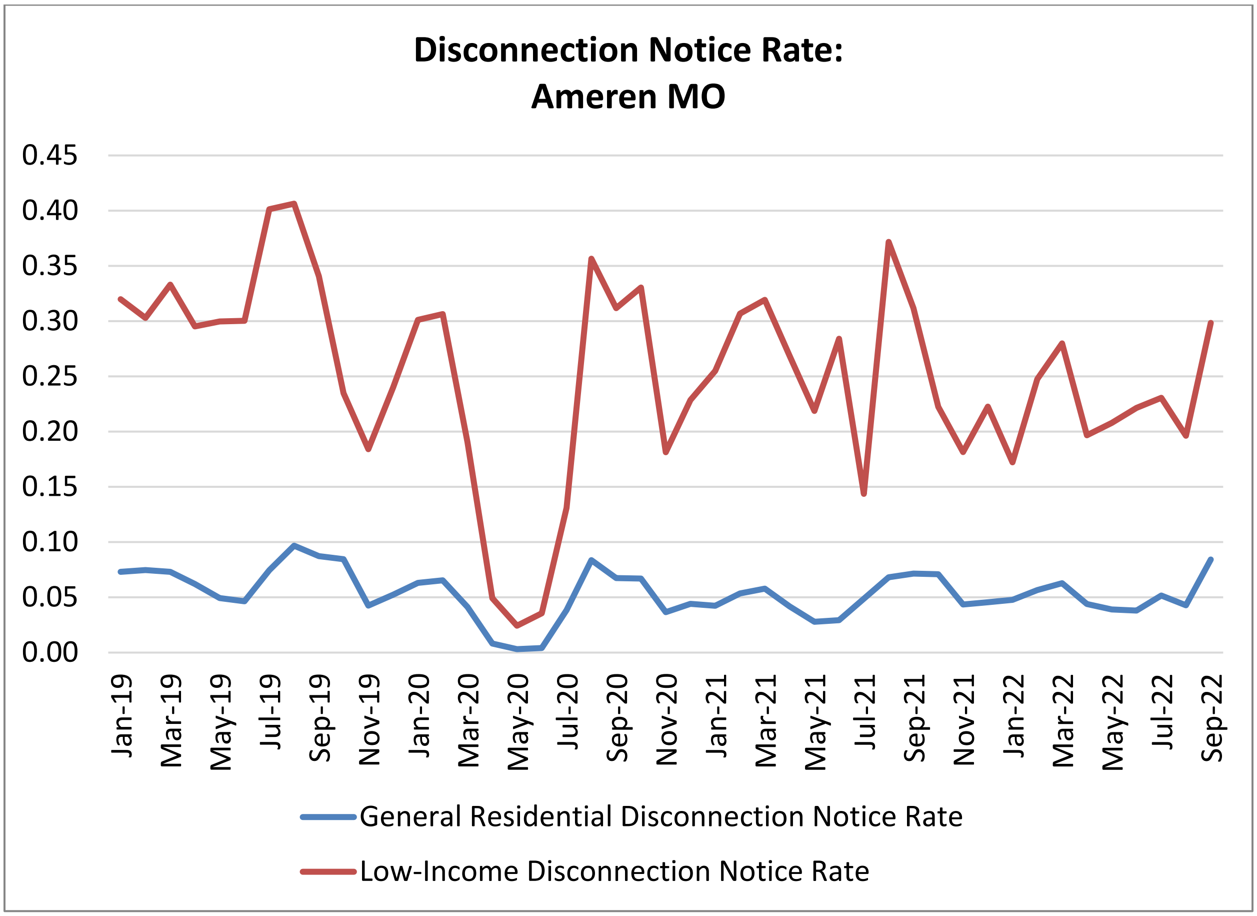
A. An examination of Ameren's credit and collections data reveals that the Company's identified low-income customers experience bill affordability challenges that far exceed those of their higher-income counterparts. As illustrated below, much higher proportions of low-income customers in the Company's service territory carry arrearages of 60-90 days or more, receive disconnection notices, and experience involuntary disconnection of vital electricity service. Each of these metrics must be viewed as key measures indicators of home energy security or insecurity. As illustrated below, Ameren's identified low-income residential customers are 3 times more likely than to general residential customers to have carried a past due balance of 60 – 90 days during the period of January 2019 – September 2022. During this period, the low-income 60-90 day arrearage rate (accounts 60-90 days past due divided by the number of general residential accounts) averaged .43. The rate for general residential customers was a somewhat more modest .17.[6] This disparity is illustrated in the chart below.



In addition to seriously past due accounts, Ameren's low-income customers receive disconnection notices at a rate 5 times higher than general residential customers. Disconnection notices in

[6] Calculated from Ameren responses to CCM 2.d, and CCM 3.f.

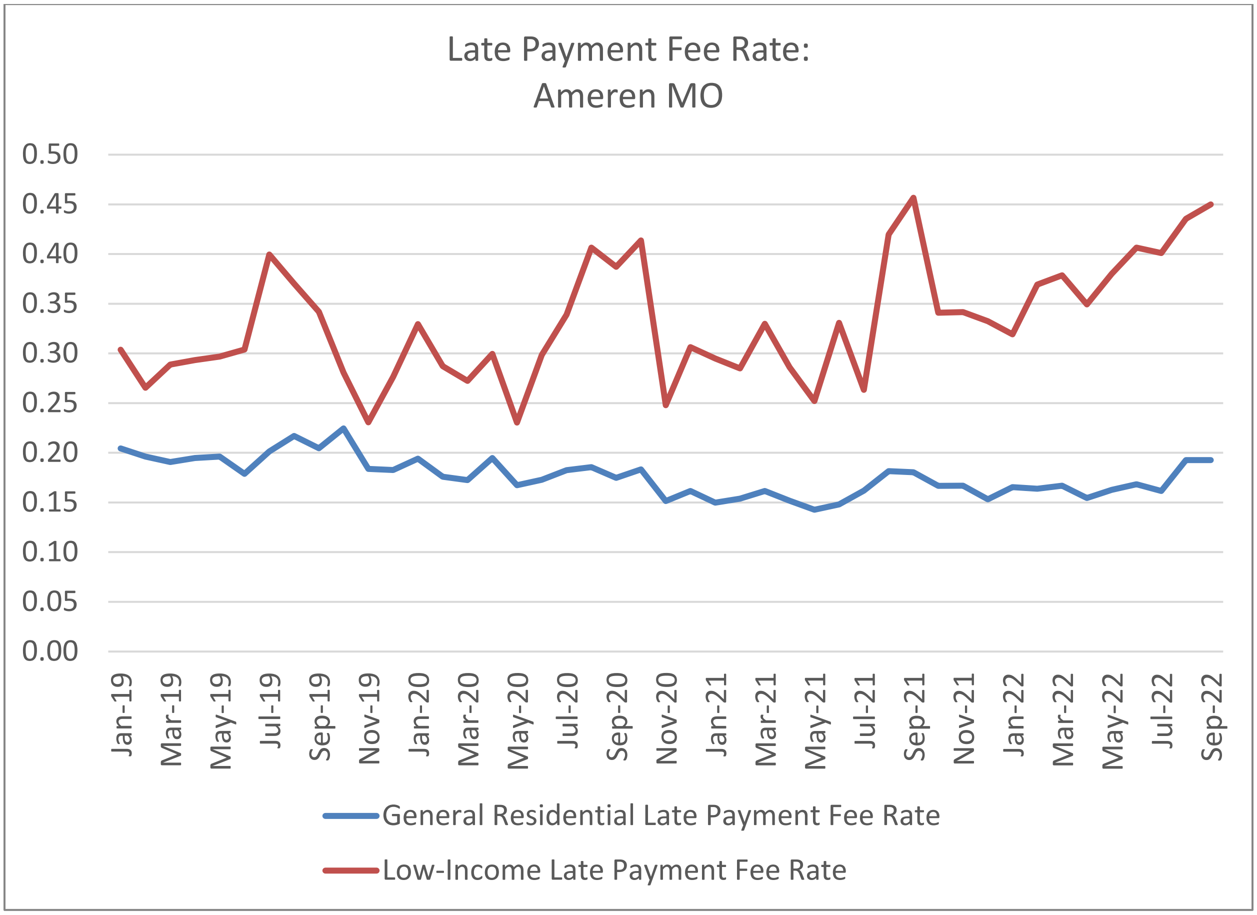
households lacking sufficient income to pay for the most basic of necessities bring tremendous stress, forcing decisions over the which necessities must be foregone to remain connected to essential service. The low-income disconnection notice rate for low-income customers was .25, while that of general residential customers was .05.[7]



Late payment fees are another accepted measure of home energy insecurity. In the Company's service territory, identified low-income customers pay late fees at a rate nearly double that of general residential customers. On average, fully one third of low-income customers bore the added

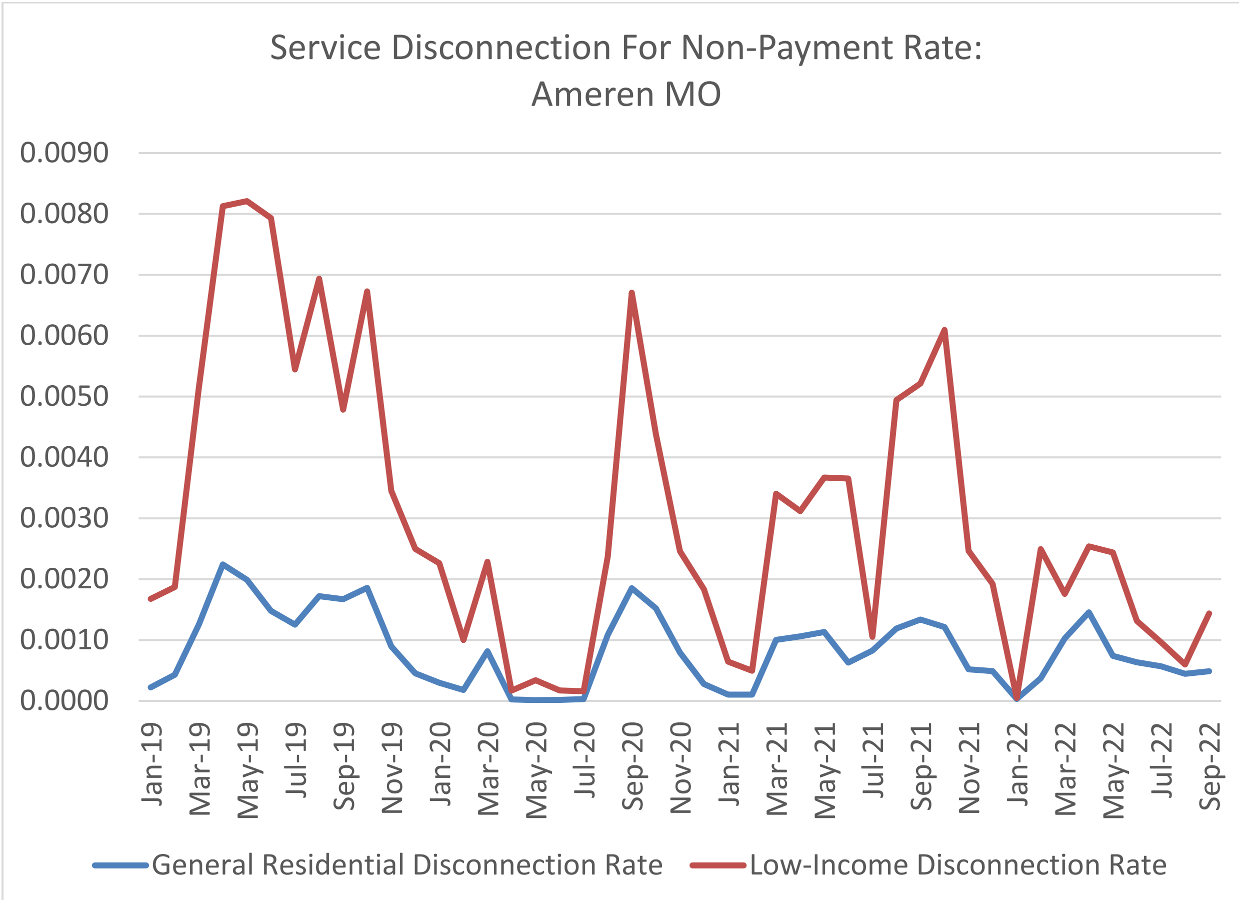
[7] Calculated from Ameren responses to 2.r and 3.t.

expense of late payment fees from January 2019 through September 2022.[8] The stark disparity is illustrated below.



Perhaps the most consequential home energy insecurity metric is involuntary service disconnection. Unwanted loss of electricity service brings a severe threat to health, safety and general well-being. Low-income households served by the Company experienced disconnection for non-payment at rate 4 times higher than that experienced by general residential customers from January 2019 through September 2002.[9] The disparity over time is shown in the graph below.

[8] Calculated from Ameren responses to 2.x and 3.z.
[9] Calculated from Ameren responses to 2.q and 3.s.



Q. WHAT ARE YOUR RECOMMENDATIONS IN THIS CASE?

Consumers Council makes the following recommendations:

1. Maintain the current residential fixed charge of $9.00. Fixed rates are regressive and disproportionately impact low-income families, especially the elderly living on fixed income.

2. Increased funding of the Ameren MO Keeping Current/Keeping Cool Program to $5 million, which would be shared equally by the ratepayers and shareholders, consistent with past precedent.

3. Revise the Keeping Current program to reflect recommendations provided below.

4. Continue funds and services for homeless individuals seeking to move to housing, allowing those individuals to receive bad debt forgiveness and to receive other benefits from the Keeping Current/Keeping Cool program that allow them equitable access to utility services.

5. Continue working collaboratively to develop and implement a Critical Needs program that is an easily accessible medical registry program, targeting medically at-risk customers.

6. Eliminate late fees, collection fees, disconnect and reconnect fees.

7. Target resources and programs to high energy burden neighborhoods, prominently African American/Black, Hispanic and any area of concentrated high energy burden. This should include energy efficiency, weatherization and assistance programs included below.

Ameren Missouri should adopt plans already being implemented by Ameren Illinois to reduce the rate of involuntary shut offs in communities that have long histories of redlining and other discriminatory practices that produce inequity in numbers of disconnections.

8. Ameren Missouri should no longer be allowed to automatically place consumers on a rate plans, unless a consumer opts out of that plan ("Opting-Out"), i.e., with regard to time-of-use utility rates. While Consumers Council is not opposed to time of use utility rates, and thinks they are a useful tool to help achieve energy efficiency, we recommend that consumers not be switched to any new rate plan without affirmatively consenting to the switch ("**Opting-In**").

Q. PLEASE EXPLAIN YOUR RECOMMENDATION RELATED TO THE FIXED CUSTOMER CHARGE.

A. Consumers Council recommends that the fixed cost remain at its current level of $ 9.00. Fixed charges are regressive and hurt many of the elderly, low-income and moderate-income level households, and those who earn below minimum wage. To promote affordability, rates should be based more on energy usage than on fixed amounts. Ideally, the rate design for residential customers should include a fixed charge that is based on nothing more than the cost of the meter, customer service, and the line to the dwelling.

Q. WHAT ARE YOUR RECOMMENDATIONS RELATED THE AMEREN MISSOURI KEEPING CURRENT/KEEPING COOL PROGRAM?

The Ameren MO Keeping Current/Keeping Cool Program has overall been a successful program that is functioning well with the guidance of the collaborative. Although there have been some challenges in enrollment this past year due to the influx of additional LIHEAP funds during COVID, those funds are temporary and are not likely to continue after 2023. The collaborative is working to target additional working families who may be living just above the LIHEAP guidelines, and working to increase partnerships among non-LIHEAP organizations. With regard to the Keeping Current/Keeping Cool programs, the Consumers Council recommends the following:

- Program design and implementation model continues under the existing collaborative model.
- Increase the amount of monthly bill credits for Keeping Cool to $75 for those with “high energy burden”, as defined by the collaborative, and $50 for all other customers.
- Increase the Keeping Current monthly bill payment to reflect energy burden, with payment levels for those with highest energy burden and the lowest income receiving up to $150, as determined by the collaborative.
- Increase the length of time customers can remain in either program to three years.
- Enroll all eligible Critical Needs and Rehousing customers in Keeping Current.
- Increase the funding for the Keeping Current Manager, as agreed by the collaborative, to continue this full-time contract employee to increase access to the programs.

- Increase the agency reimbursement for completing Keeping Current Applications from $25 to $50. Maintain the $25 incentive payment to agencies for customers who successfully complete the program.
- Increase the annual funding level by 1 million dollars to assure adequate funding for the program expansion details described above.
- Continue to have biannual third party evaluations of the Keeping Current Program/Keeping cool programs.
- Continue the income eligibility at 300% of poverty, to be reevaluated during the next Ameren Missouri rate case.

Continuing this expanded income level (300% of the federal poverty level) would provide assistance to the working poor who are feeling the impact of inflation most, and who may not receive assistance from LIHEAP or other programs.

This increase in eligibility, along with the additional funds requested, would allow Ameren to serve some of the 246,000 households who are between 200% and 300% of federal poverty level, and who may not be eligible for other forms of assistance.

The chart below, based on 2019 census data, shows the potential numbers of eligible customers up to the 300% level.

State of Missouri–HOUSEHOLDS

50% of poverty	57,783
125% of poverty	186,730
150% of poverty	247,232
185% of poverty	329,465
200% of poverty	367,826
300% of poverty	614,362

Q. PLEASE EXPLAIN YOUR RECOMMENDATION REGARDING THE MEDICAL REGISTRY PROGRAM.

A. Ameren Missouri is making progress with implementation of the Critical Needs Program, which is scheduled to start in the first quarter of 2023. Ameren Missouri should continue to work collaboratively with other utilities, intervenors, interested nonprofits, and medical professionals to develop a transparent and easily accessible medical registry program for customers who have a chronic or serious medical condition, providing heightened procedures to help prevent medical tragedies related to household disconnection from energy services. Consumers Council recommends the adoption of the assumptions and model below, which take into account best practices from other successful Critical Medical Needs programs around the country. This recommended approach borrows generously from the best practices compiled in a recent report from the National

Consumer Law Center, entitled "Protecting Seriously Ill Consumers from Utility Disconnections: What States Can Do to Save Lives Now." [10]

Consumers Council applauds the collaborative efforts that are being made to design this program, and recommends the Commission adopt the assumptions and program design elements below:

Assumptions:

- Utilities are a necessity of modern life, and the loss of utility service can pose a direct threat to the health and well-being of those living in a home where service is terminated.
- Exposure to prolonged periods of extreme heat or extreme cold can endanger a person's health. The danger is much more pronounced for consumers who have a serious illness, are medically vulnerable, rely on medical equipment that requires electricity, or need refrigerated medications.
- Seriously ill consumers who have fallen behind on their utility bills may not have the capacity to research and apply for serious illness protection, negotiate reasonable payment plans, and complete applications for federal and charitable bill payment assistance, energy efficiency programs.
- Utility commissions should err on the side of protecting lives and health. Utilities run the risk of litigation and reputational harm if the customer needs to be hospitalized or dies due to disconnection of essential utility service while seriously ill.
- Coordination among all utilities is essential for protection of customers with serious medical illnesses.

1. Who is eligible?
   Any customer or permanent household resident with an existing serious illness whose condition would be aggravated by the involuntary disconnection or suspension of utility service.

2. Who can certify?
   Physicians, physician assistants, osteopaths, nurse practitioners, hospice care professionals, nurses, or licensed mental health professionals.

[10] Wein, O. B. and Harak, C. (2021) *Protecting Seriously Ill Consumers from Utility Disconnections: What States Can Do to Save Lives Now*, National Consumer Law Center, Inc.: https://www.nclc.org/issues/energy-utilities-a-communications/protecting-seriously-ill-consumers-from-utility-disconnections.html.

The judgment of the certifying professional shall be considered presumptively valid and conclusive, unless successfully challenged in a formal complaint filed by the utility at the Missouri Public Service Commission.

3. Certificate Content (no official form required to document illness):
   1) Name and contact information of the certifying party;
   2) Service address and name of patient;
   3) A statement that the patient resides at the premises in question; and
   4) A statement that the disconnection or suspension of utility service will aggravate an existing serious illness.

4. Prompt initiation and adequate duration of protection.
   <u>Initial Protection</u>: Customer shall obtain an initial protection from disconnection (whether a reconnection or a suspension of a termination) via a phone call; certification of a serious illness must be submitted within 30 days. Utility shall promptly reconnect services during that 30-day period (if the household was already disconnected) and shall waive the reconnection fee.

   <u>Renewal</u>: The initial disconnection protection shall last one year and is renewable for the duration of the medical condition if certified by the appropriate medical or other professional.

5. Adequate Notice and Easily Accessible Notification Process.

Utilities shall notify customers of the serious illness protection rules at initiation of service and whenever collection and disconnection notices are sent. Notices shall be made available in both English and any other language used by substantial numbers of their customers within the utility's territory. Utilities shall also partner with energy assistance community organizations for outreach and referrals to the critical medical needs program.

6. Affirmative Outreach.

Utilities shall train company service representatives and field agents to solicit information regarding any serious illness in the household and they shall have the authority or ability to postpone a termination pending certification of the illness. At least three days before the scheduled disconnection, the utility must attempt to contact the customer or a responsible adult occupant by telephone, in person, or, with the customer's consent, electronically. If the utility succeeds in making contact, it must inform the customer of the serious illness protection. Utilities must include information about serious notification protections in collection and disconnection notices sent to consumers.

7. Monitoring and Enforcement.

> Utilities shall collect, report, and analyze data regarding the implementation of their serious illness rules. Utilities shall break this information down by zip code or census tract and shall include:
> - Number of serious illness protection requests.
> - Number of serious illness protection requests granted.
> - Number of payment agreements.
> - Number of serious illness account disconnections.
> - Number of serious illness protection reconnections.

Q. EXPLAIN YOUR RECOMMENDATION RELATED TO AMEREN MO'S RECONNECT CHARGES, COLLECTION TRIP CHARGES, AND LATE FEES.

A. I recommend that all of Ameren Missouri's reconnect charges, collection trip charges, and late fees be eliminated. I am not convinced that such fees provide the "deterrence" to nonpayment that is sometimes given as a justification for these fees. From my experience, these fees do not change behavior, rather they merely create an inequitable cost for struggling customers, who are likely to have high energy burden and inability to cover their current bills. These added fees also decrease the energy burden impact of limited utility assistance funds, reducing the amount of assistance applied to actual energy usage.

Q. PLEASE EXPLAIN YOUR RECOMMENDATION RELATED TO ADOPTING THE AMEREN ILL PLAN TO REDUCE SHUTOFF IN TARGETED NEIGHBORHOODS

A. In Illinois, Ameren Illinois agreed to a settlement in which the utility committed to reduce involuntary disconnections by 10% annually over a 4-year period in the 20 zip codes within its service territory with the highest disconnection rates. In its Order approving this affordability metric, the Illinois Commerce Commission notes as follows:

> In addition, Ameren commits to monitor, each month, and work to reduce disconnections in all 20 zip codes included in the affordability metric,

> notwithstanding the aggregate calculation of the metric. Ameren also agrees to not achieve this metric by simply allowing arrearages in the top 20 zip codes to grow as a result of the reduction in disconnections, narrowly focusing its efforts in reducing disconnections in the top 20 zip codes to a select-few of those zip codes, or strategically timing disconnections for maximum company benefit. Instead, the Company will actively take other measures, such as improved outreach with customers whose arrearage levels indicate they are struggling to afford essential utility service in order to connect those customers with financial assistance, and will actively explore and, where appropriate adopt, other measures that will improve long-term affordability of monthly electric bills for these customers. These commitments on Ameren's part address the concerns raised by IIEC and CUB/EDF in their respective Briefs on Exceptions that Ameren may be incentivized to engage in gaming this metric rather than taking meaningful, proactive steps to achieve reductions in disconnections. The Commission finds the metric to be reasonable and it is adopted.[11]

Consumers Council recommends that Ameren Missouri adopt a commitment with respect to disconnection reductions in its service territory similar to that approved in Illinois. Such a commitment will particularly benefit communities of color and others that have not shared equally shouldering the costs and enjoying the benefits of the utility system.

Q. PLEASE EXPLAIN YOUR RECOMMENDATION RELATED TO THE CURRENT OPT-OUT TRANSFERS TO TIME-OF-USE RATE PLANS.

A. Ameren is currently offering a variety of new rate options to customers, and Consumers Council is pleased that consumers have such options, as different rate plans could result in substantial savings, if they fit a particular customer's lifestyle. However, Consumers Council is concerned that the policy of switching electric consumers to "Opt-Out" plans should not be permitted in the future. Consumers should ideally never be switched to another rate plan without giving their clear affirmative consent.

[11] Order of the Illinois Commerce Commission, Docket 22-0063, September 27, 2022, p. 132.

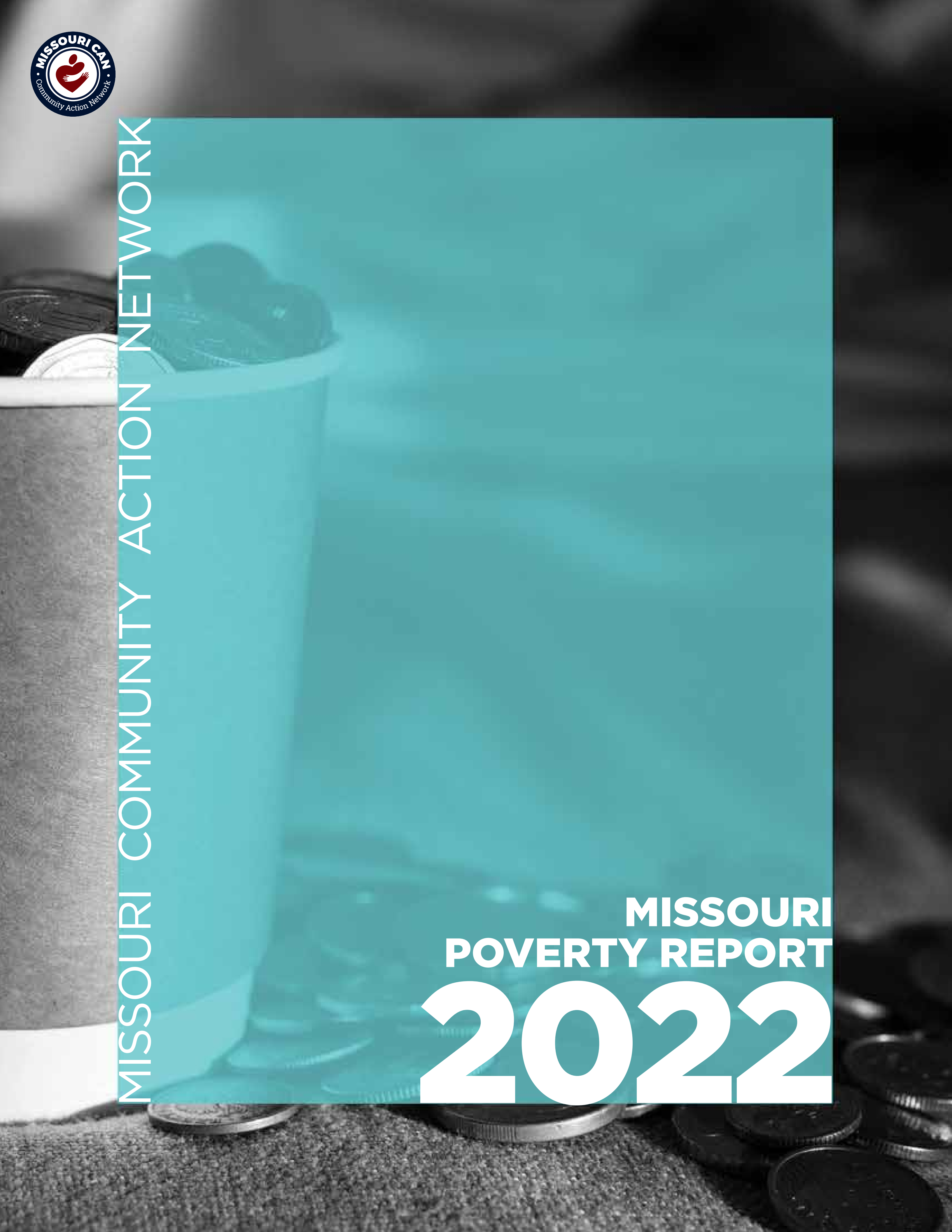
Based on an agreement in the previous rate case, Ameren Missouri will automatically switch a customer to an "Evening/Morning" time-of-use plan. Sometimes, despite the efforts to educate the consumer, the switch is made without the consumer realizing what has happened. The decision of rate plans has the potential to add additional costs, creates vulnerability for families with small children, working individuals who do not take time to read the inserts, those living with disabilities, and seniors.

It is Consumers Council's recommendation that Ameren Missouri should continue to educate customers about the various rate plans, but should also require customers to affirm their desire to participate by "Opting-In" before a switch in rate plans is allowed.

A letter to the Public Service Commission was shared with Consumers Council. (Attachment 3 to this testimony). The letter is from an Ameren customer who took no action and yet experienced a switch. The letter explains frustration with the "Opt-Out" requirement. Consumers Council is concerned that there may be many other similarly situated customers who do not know that they have been switched to a different rate.

Q. DOES THIS END YOUR TESTIMONY?

A. Yes.



MISSOURI CAN
Community Action Network

MISSOURI COMMUNITY ACTION NETWORK

MISSOURI POVERTY REPORT 2022

INTRODUCTION

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Missouri Community Action Network produces this biannual report to examine poverty in the state by utilizing data from a variety of sources, including the Bureau of Labor Statistics, Food Research and Action Center, Center on Budget and Policy Priorities, and the US Census Bureau.

The goal is to create an objective snapshot of poverty in Missouri. This report is not intended to be a definitive or even comprehensive source on poverty in the state. Rather, it is an entry point to the wealth of data that can guide our efforts to address poverty within our communities.

Sound public policy should be informed by verifiable, quality data. The figures and statistics presented in this report can help us determine the efficacy of public policy measures, and in turn, guide our efforts at the local, state, and national level.

Since our last Poverty Report the United States and the State of Missouri experienced the COVID-19 Pandemic. This once in one-hundred-year event impacted the health, employment, and poverty of Missourians from all backgrounds. The timing of the Pandemic impacted the 2020 Census. Experts and advocates continue to assess the accuracy of the census given difficulties conducting typical in person counts.

We recognize that these major events affect the Poverty Report and the quality of available data. Some data on aspects of the Pandemic is not yet available. This report is not solely focused on the pandemic. The data shows the interconnected nature of life's necessities: economic and family security, education, food and nutrition, health, and housing and energy. These are the five elements of poverty and create an overall framework we can use to examine the data presented in this report.

This year's report features a section on the anti-poverty measures in Missouri and the COVID-19 pandemic. By presenting this information, we hope to continue the conversation around the role of emergency responses to alleviate poverty during times of national crisis as well as foundational programs and services necessary to empower individuals and families to move out of poverty and achieve a level of economic security or independence.

It is our intention that this report be used as a tool by legislators, advocates, nonprofits, schools, churches, and other stakeholders to create a broader understanding of poverty and the impact it has on our state. We encourage you to utilize the sources listed at the end of this report to further explore the information. It is only through an unbiased interpretation of data that we can begin to enact measures that truly help all Missourians thrive.

MEASURING POVERTY

2022 POVERTY GUIDELINES

Persons/Household	Gross Income
1	$13,590
2	$18,310
3	$23,030
4	$27,750
5	$32,470
6	$37,190
7	$41,910
8	$46,630

Official Poverty Measure

The official poverty measure (OPM) was created in 1963 and is based on the cost of the minimum food diet in current prices, and then multiplied by three for different family sizes. This poverty measure does not consider typical household expenses, though, such as gas to get to work, childcare, prescriptions, and a host of other costs families regularly encounter. The poverty calculation also does not take into account the value of federal benefits, such as the Supplemental Nutrition Assistance Program (SNAP) or the Low-Income Heating and Energy Assistance Program (LIHEAP).

Supplemental Poverty Measure

The Supplemental Poverty Measure (SPM) considers other factors, such as family resources, including income and benefits such as SNAP, subsidized housing, and LIHEAP. Census data released in 2021 shows that when taken as a three-year average from 2018-2020, the Missouri SPM was 2.7% lower than the official poverty measure (US Census Bureau).[1]

In Missouri, the SPM by a 3-average (2018-2020) was 8.1%. The official poverty measure for that same time period was 10.8% (US Census Bureau).[2]

2022 Poverty Guidelines

The Poverty Guidelines are determined by the Department of Health and Human Services and updated annually. Amounts are based on the number of persons in a family per household. For families or households with more than eight people, $4,720 added for each additional person (US Department of Health and Human Services).[3]

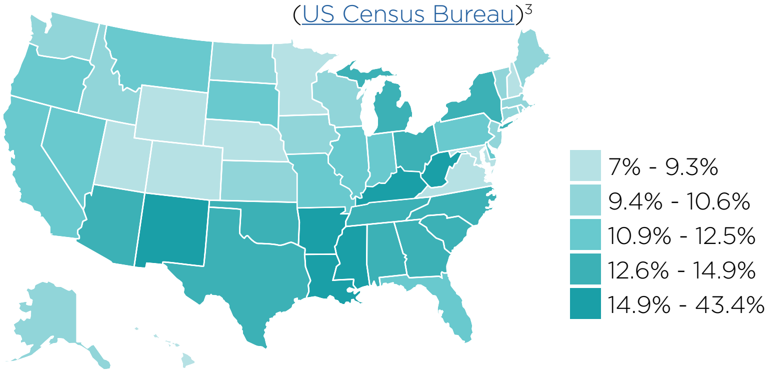
50%, 100% and 200% of Poverty

Sometimes, data refers to “100% of the federal poverty level (FPL)” or “200% FPL.” These levels are used to indicate the severity of poverty. For example, a household of five people with $31,417 adjusted gross income would be considered in poverty, or 100% FPL. 50% of poverty would be half of that, or $15,708. The 50% poverty threshold represents extreme poverty. Conversely, 200% FPL for a family of five would be $62,834 (US Census Bureau).[4]

Although the poverty level is updated annually, the methodology for determining poverty rates has seen little change since it was developed. Take inflation. Year to year, inflation outpaces the change in poverty level—the cost of goods increases while lower-income populations have a higher cost burden. These thresholds help illustrate what families require to meet basic needs.

POVERTY: OVERVIEW

US MAP OF POVERTY RATES
(US Census Bureau)[3]



POVERTY ACROSS AMERICA & MISSOURI

The US Census Bureau uses the American Community Survey (ACS) to capture data at the local level to show how public assistance impacts areas across the nation. It is the premier source for data on population and housing in the United States. This survey gives us a broad view of poverty in the United States and in Missouri.

It is worth noting that different surveys and reports will deliver different figures based on the methodology used. For example, the ACS 2016-2020 5-year estimates indicate the poverty level in the US is 12.8% (US Census Bureau).[1]

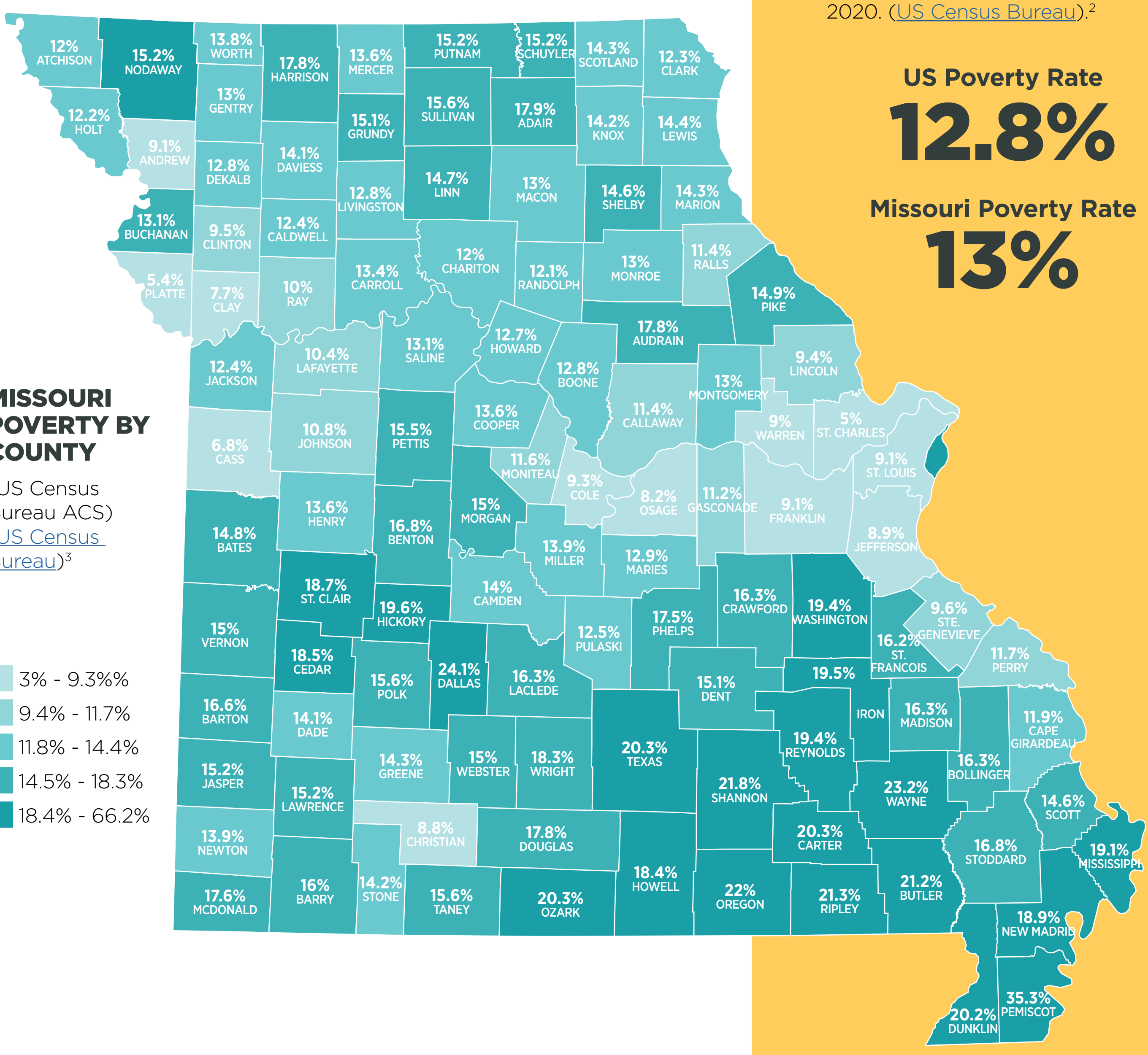
However, the Current Population Survey Annual Social and Economic Supplements from the Census Bureau estimates a poverty rate of 11.4% in 2020. (US Census Bureau).[2]

US Poverty Rate
12.8%

Missouri Poverty Rate
13%

MISSOURI POVERTY BY COUNTY

(US Census Bureau ACS) (US Census Bureau)[3]

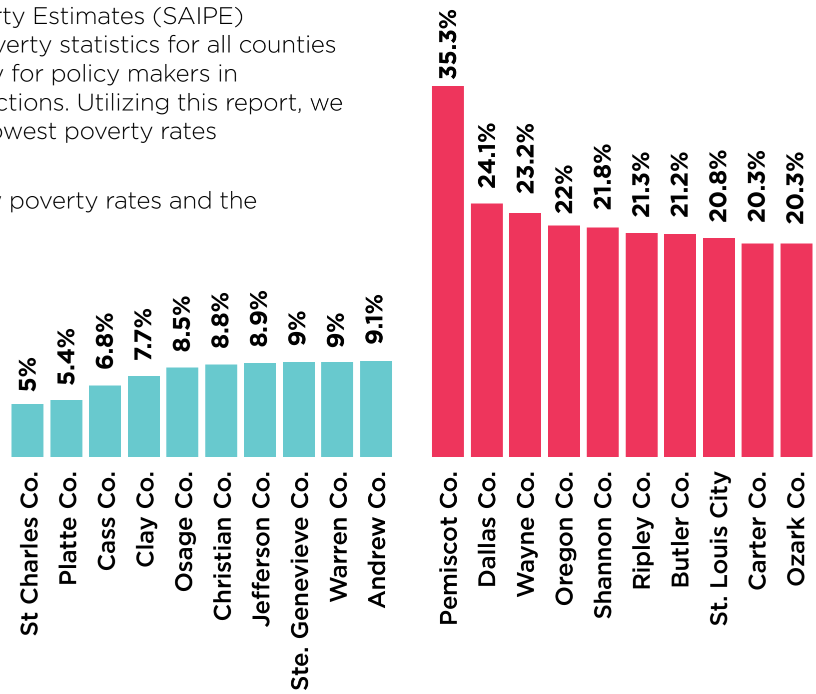


- 3% - 9.3%%
- 9.4% - 11.7%
- 11.8% - 14.4%
- 14.5% - 18.3%
- 18.4% - 66.2%

LOCAL SNAPSHOT OF POVERTY

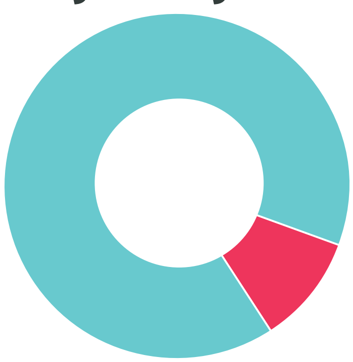
The US Census Bureau's Small Area Income and Poverty Estimates (SAIPE) program provides annual estimates of income and poverty statistics for all counties and states in the nation. The program is used primarily for policy makers in deciding the allocation of federal funds to local jurisdictions. Utilizing this report, we get a view of Missouri counties with the highest and lowest poverty rates (US Census Bureau).[4]

Observe the difference between the counties with low poverty rates and the counties with high poverty rates.



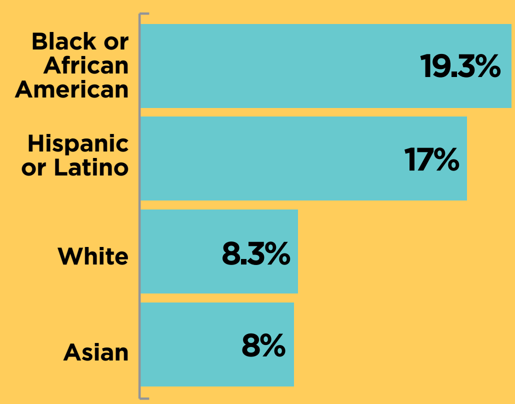
Missouri population:

5,942,813



Missouri population below poverty level:

772,992



POVERTY AND RACE

The American Community Survey show how race impacts the percentage of people in poverty across Missouri. The disparities between races are evident—white Americans experience a lower rate of poverty than people of color (US Census Bureau).[1]

POVERTY AND GENDER

The ACS also shows us the disparity between males and females. Women face a 2.3% higher rate of poverty than men (US Census Bureau).[1]

11.8%
of Missouri men in poverty

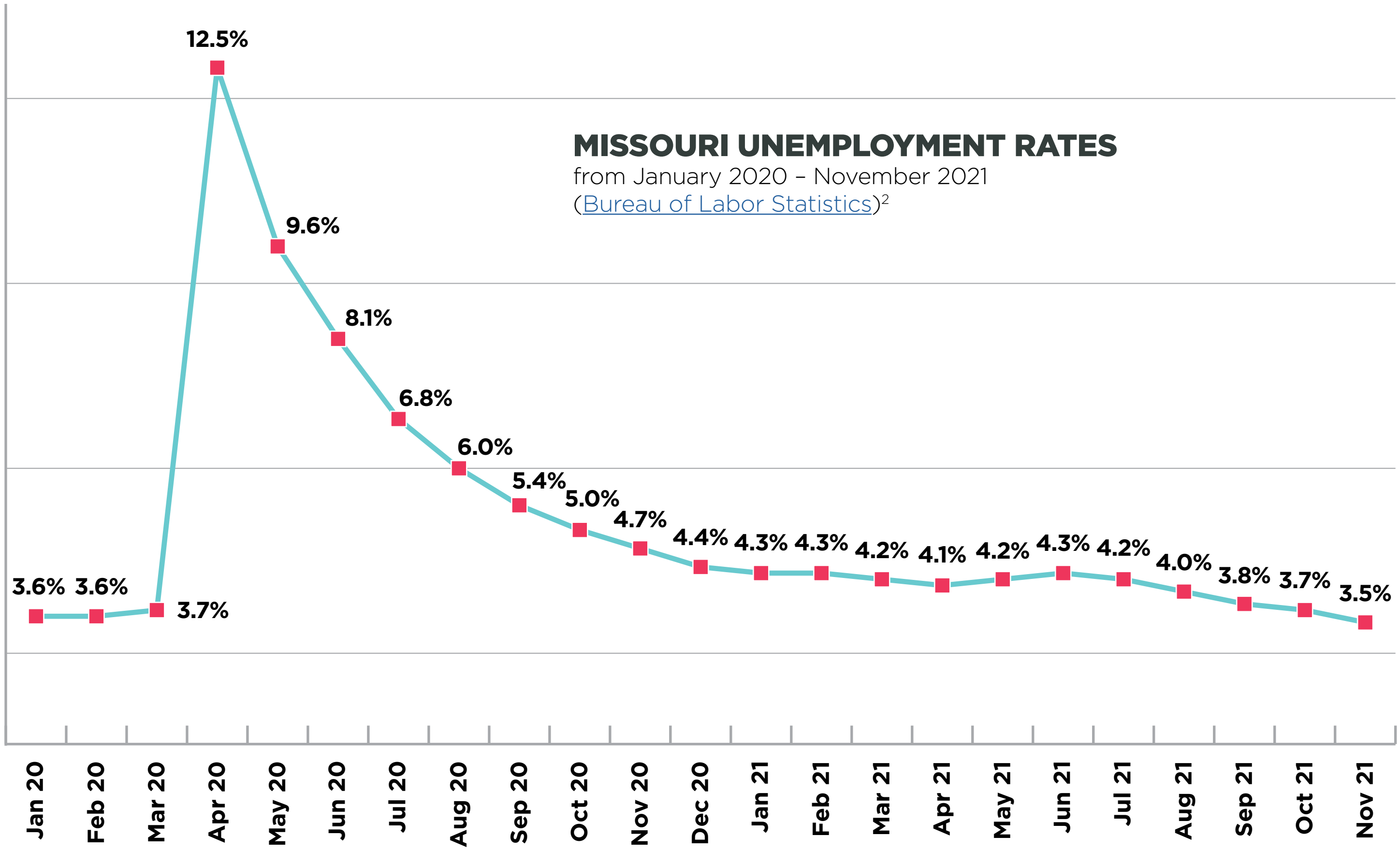
14.1%
of Missouri women in poverty

CHILDREN IN POVERTY

Children who grow up in poverty often lack food, shelter, healthcare, and education they need to thrive. This can have a profound impact on future economic stability. According to the US Census Bureau's American Community Survey, 17.4% of Missouri children live in poverty; 19.3% of children under 5 years of age in Missouri are in poverty (US Census Bureau).[1]

17.4%
of Missouri children in poverty

ECONOMIC AND FAMILY SECURITY



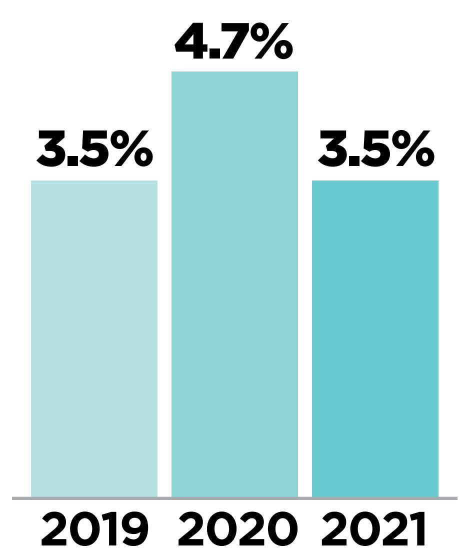
Economic and family security is the foundation for the well-being of an individual or family—in many ways, it's the starting point of what sets a family up for success. Numerous factors impact economic and family security, including the local economy, availability of jobs, minimum wage regulations, and taxes. For example, the minimum wage in Missouri is less than the living wage, as calculated by geography, race, and gender.

Nov. 2021 (Bureau of Labor Statistics)[1]

EMPLOYMENT & UNEMPLOYMENT

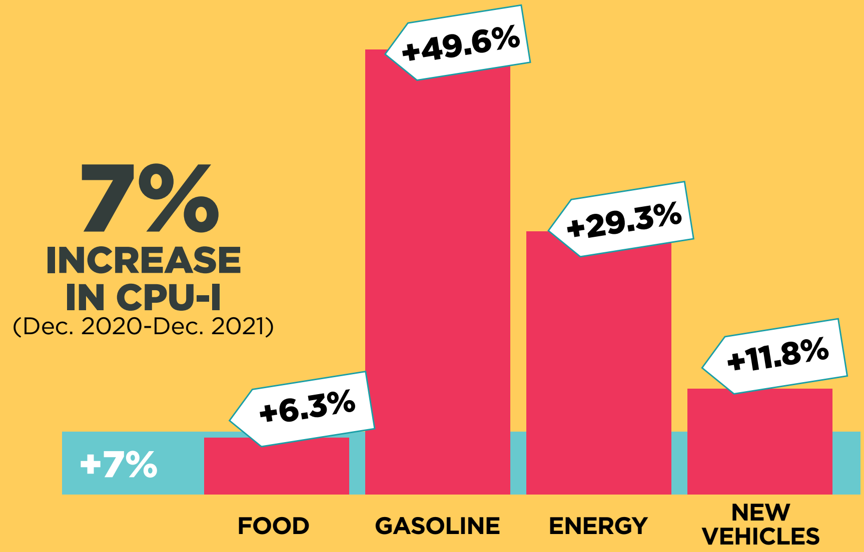
Employment is the greatest impactor of economic and family security. The unemployment rate in Missouri has fallen steadily over the last decade, from 9.3% in Jan. 2011 to 3.7% in March of 2020. Then many businesses closed in response to the COVID-19 pandemic and Missourians were left without employment. The unemployment rate for April 2020 reflects that, rising sharply to 12.5%. However, by November 2021, it had fallen below pre-pandemic rates to 3.5% (US Bureau of Labor Statistic).[1]

Missouri Unemployment 2019 vs 2020 vs 2021
(Bureau of Labor Statistics)[1]



INFLATION

Inflation impacts all Americans, but has an additional cost burden to low-income citizens, who are exponentially affected by rising prices. Inflation is not always factored into federal appropriations for public assistance, reducing the purchasing power of benefits. Inflation is also a federal concern to regulate and reduce. According to the US Bureau of Labor Statistics, inflation was 7.0% from Dec. 2020 to Dec. 2021, the largest annual percent change since 1981 (Bureau of Labor Statistics).[3]



MINIMUM WAGE

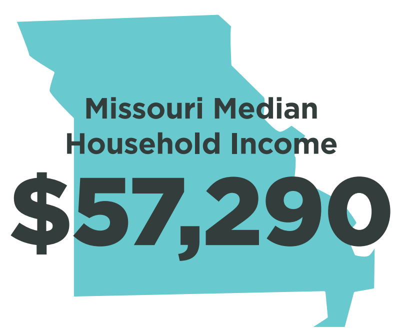
As of Jan. 2022, Missouri's minimum wage was $11.15. Several states, including Missouri, have enacted gradual minimum wage increases to take effect over the next several years. Six states do not have a state-mandated minimum wage ([MO Dept. Of Labor](#)).[4]

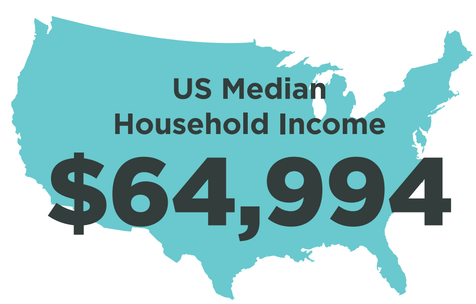
Before taxes, a Missouri working full time for 40 hours a week at the state minimum wage earns:

= **$11.15** HOURLY **$446** WEEKLY **$23,192** ANNUALLY

MEDIAN HOUSEHOLD INCOME

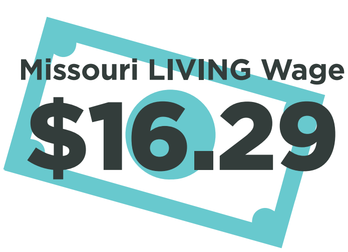
The median income of households in Missouri was $57,290 in 2020. The US median income was $64,994 ([US Census Bureau](#)).[6]

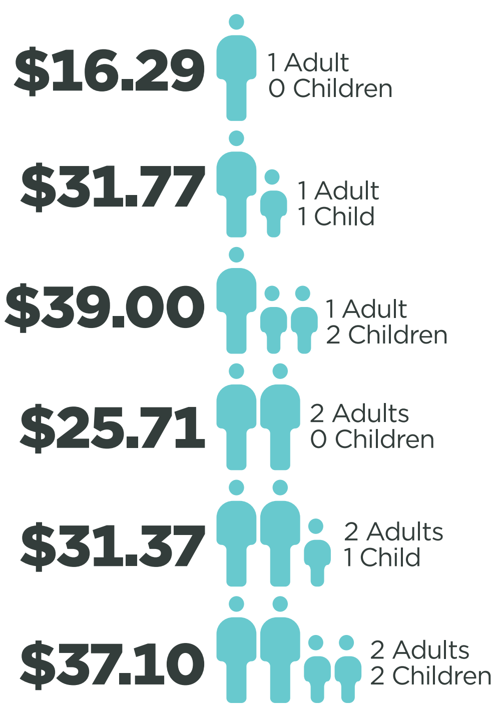




LIVING WAGE

The living wage is the hourly rate that an individual in a household must earn to support themselves. Missouri's hourly living wage is $16.29 for a single adult; for a couple with two kids, both parents would need to make $37.10 an hour. The living wage calculator was created by Dr. Amy K. Glasmeier in 2004. The tool is used to help communities and employers understand the actual hourly wage that allows people to support themselves at a basic standard of living ([Living Wage Calculator](#)).[5]





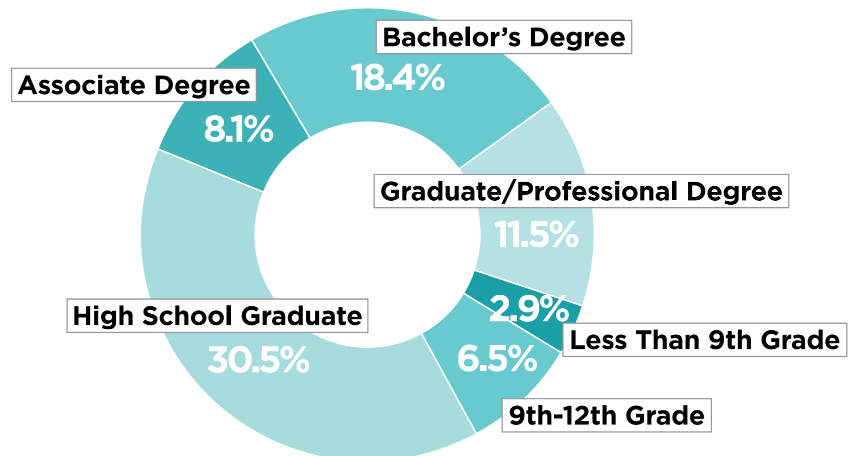
EDUCATION

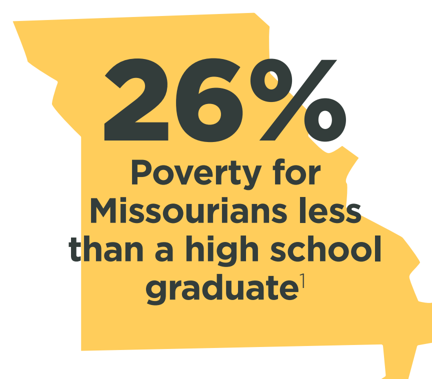
Studies consistently show that education attainment increases employment rates and earnings, which have a pronounced impact on economic and family security. Education can include traditional four-year colleges and universities, trade schools, apprenticeships, and bridge programs. Education is a key strategy in reducing poverty. There are significant barriers for low-income students to participate in education after high school. The cost of higher education continues to climb while wage growth has been stagnant. Student loan debt creates future hardships for graduates.

The foundation of education in the early years is just as important. Education for children is critical as it provides opportunity for growth and development, setting them up for long-term success and giving them a greater chance of ending the cycle of generational poverty. The poverty rates for high school graduates are lower than those without a high school diploma or equivalent.

EDUCATIONAL ATTAINMENT IN MISSOURI

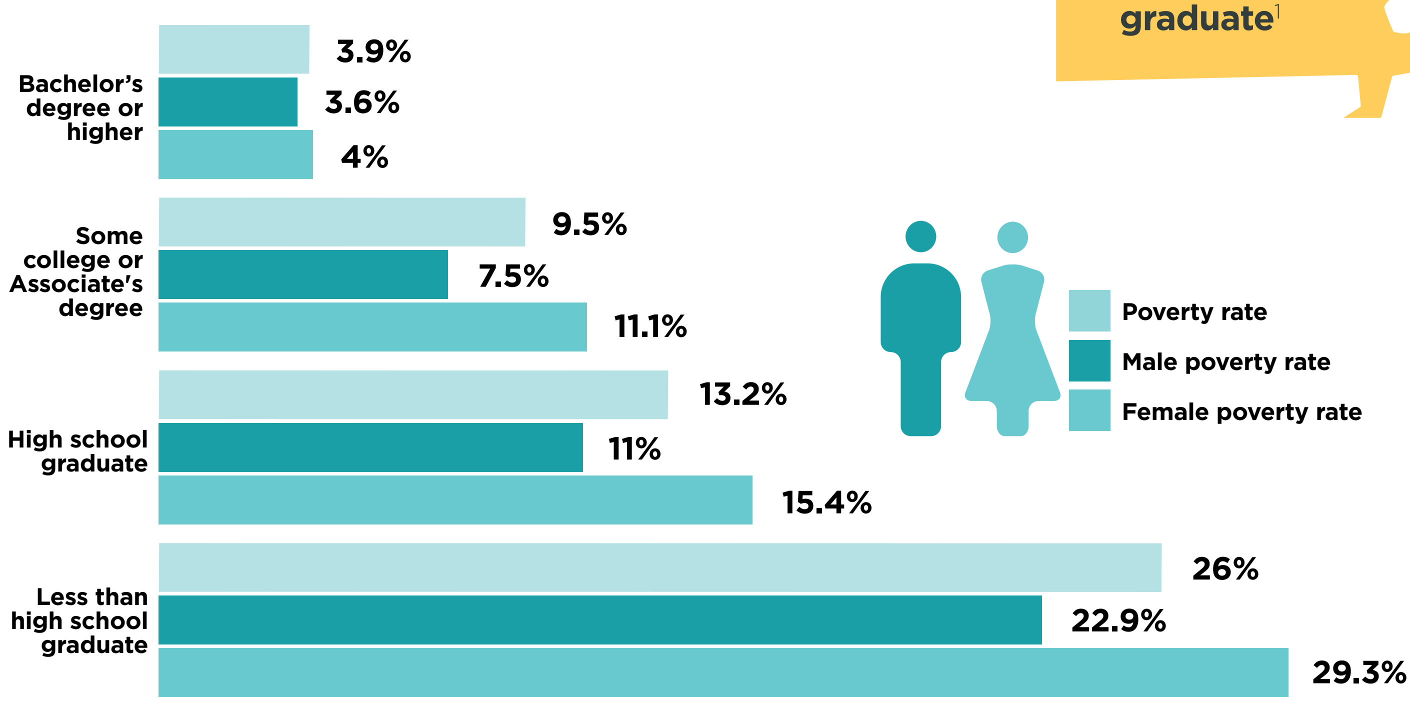
30.5% of Missourians 25 years and older have a high school diploma or equivalency, and 9.4% of Missourians have less than a high school diploma. As the level of education increases, the more skills are developed and the more access a person has to better paying occupations. 18.4% of Missourians have a bachelor's degree; 11.5% have a graduate or professional degree (US Census Bureau).[1]





POVERTY RATES BY EDUCATIONAL ATTAINMENT

US Census data reveals higher poverty rates for Missourians with lower educational attainment. The poverty rate is higher for females than males at each of the four educational attainment levels. The data shows poverty rates for Missourians 25 years and older (US Census Bureau).[1]



EMPLOYMENT AND EARNINGS BY EDUCATIONAL ATTAINMENT

Education plays a part in economic security. The following data reflects earnings for full-time, salaried workers persons aged 25 and older in the US. These education categories reflect only the highest level of educational attainment and do not consider completion of training programs such as apprenticeships and other on-the-job training. As education attainment increases, median annual earnings increase and unemployment decrease—a combination that illustrates increased economic security. Missourians with less than a high school diploma have an unemployment rate more than twice that as those with a bachelor's degree (Bureau of Labor Statistics).[2]

Earnings and unemployment rate by educational attainment

EDUCATIONAL ATTAINMENT	MEDIAN WEEKLY EARNINGS	UNEMPLOYMENT RATE
Less than high school diploma	**$619**	**11.7%**
High school diploma	**$781**	**9.0%**
Some college, no degree	**$877**	**8.3%**
Associate's degree	**$938**	**7.1%**
Bachelor's degree	**$1,305**	**5.5%**
Master's degree	**$1,545**	**4.1%**
Professional degree	**$1,893**	**3.1%**
Doctoral degree	**$1,885**	**2.5%**

Median Income Based on Educational Attainment and Gender
(US Census Bureau)[1]

EDUCATIONAL ATTAINMENT	TOTAL	MALE	FEMALE
Less than high school graduate	**$25,089**	**$30,051**	**$19,096**
High school graduate (includes equivalency)	**$31,391**	**$37,726**	**$24,978**
Some college or associates degree	**$35,924**	**$43,537**	**$30,577**
Bachelor's degree	**$50,856**	**$62,067**	**$42,427**
Graduate or professional degree	**$63,088**	**$79,013**	**$55,110**

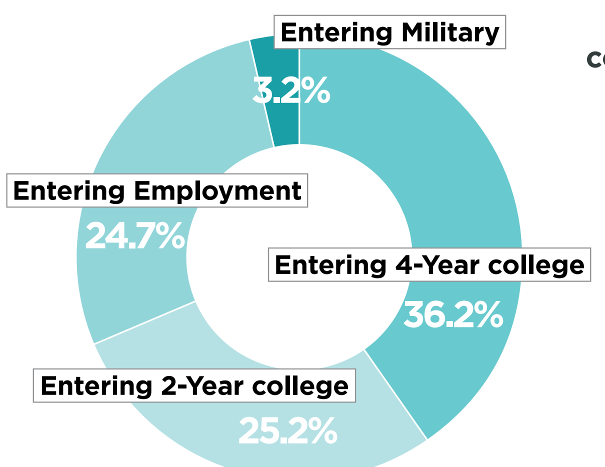
HIGH SCHOOL GRADUATION RATES

In 2019 the 4-year graduation rate for Missouri public high school students was 89.2%. The overall dropout rate was 1.6% (Missouri Department of Education and Secondary Education).[4]

4-year graduation rate for Missouri public high school students

WHERE MISSOURI STUDENTS GO

Missouri students follow one of five paths after graduation. 61.3% of students pursue continued education whether at a technical institution, 2-year college, or 4-year college/university. Almost a quarter entered the workforce after graduating from high school (Missouri Department of Education and Secondary Education).[5]



STUDENT DEBT

While education increases future earnings and lowers unemployment, student debt can create economic hardships for college graduates. The average debt for a Missouri college graduate was $28,713 (The Institute of College Access and Success).[3]

$28,713

Average debt of Missouri college graduates 2019-2020

56%

Of Missouri college students graduate with debt

FOOD & NUTRITION

Food is one of life's most basic necessities. Without access to nutritious food, people are at greater risk of disease and health issues, as well as reduced mental focus at work for adults and at school for students. Yet this basic need is a struggle for many Missourians.

Food insecurity and hunger continue to plague our state, and COVID increased those difficulties. The economic fallout from the pandemic forced many families to seek food at local food banks, even with increased assistance.

There are numerous barriers to nutritious food, including a household's low income, the affordability of food, and access to food depending on where one lives. Food deserts exist in both urban and rural locations. Whatever the barriers, the numbers show Missourians experience food insecurity at rates higher than the national average.

FOOD SECURITY VS INSECURITY

The USDA always defines food security as access by people to enough food for an active, healthy life. Food insecurity is the state of being without reliable access to enough affordable, nutritious food. Missouri ranks as the 34th highest for food insecurity at 11.5%, which is higher than the national average of 10.7% (USDA).[1]

10.7%

US households have low or very low food security

FOOD INSECURITY IN MISSOURI

Food insecure households are those that are not able to afford an adequate diet in the past 12 months. According to the US Department of Agriculture's Economic Research Service, 11.5% of Missouri households experienced low or very low food security, compared to the national average of 10.7%. The prevalence of food security varies considerably from state to state, ranging from 5.7% in New Hampshire, to 15.3% in Mississippi (USDA).[1]

11.5%

Missouri households have low or very low food security

$1 in SNAP benefits generates $1.50 in economic activity

SUPPLEMENTAL NUTRITION ASSISTANCE PROGRAM (SNAP)

The mission and purpose of the Supplemental Nutrition Assistance Program (SNAP) is to improve the diets of low-income households by increasing food access and food purchasing ability. SNAP benefits are available to recipients on an Electronic Benefits Transfer card for individuals and families to make purchasing decisions based on their specific dietary needs. SNAP is available for household-level incomes less than 130% of the poverty level (USDA).[2]

340,865

Missouri families participated in SNAP (monthly average) FY2020

715,447

Missourians participated in SNAP FY2020

$1,342,772,664

Distributed in SNAP benefits FY2020

Average monthly SNAP benefits FY2019
(Center for Budget and Policy Priorities)[3]

All households:
$250

Households with children:
$425

Working households:
$354

Households with seniors:
$106

Households with non-elderly disabled individuals:
$170

NATIONAL SCHOOL LUNCH PROGRAM

The free and reduced-price lunches offered by schools through the National School Lunch program help address food insecurity on the student level. When school districts see participation past a certain threshold, all students across the district may be eligible for this program, increasing access to a food insecurity solution that benefits the entire school community (USDA).[4]

233,066

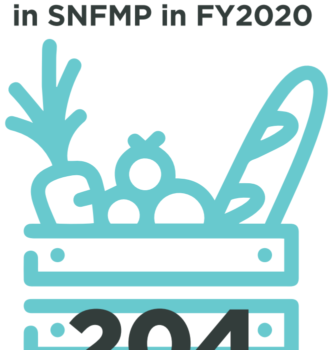
Missouri Students participated in the National School Lunch program in FY2021

SENIOR FARMER MARKET PROGRAM

The federal Senior Farmers Market Program (SNFMP) is designed to provide low-income seniors with access to locally grown fruit and vegetables (USDA).[5]

1,755

Missouri seniors participated in SNFMP in FY2020



204

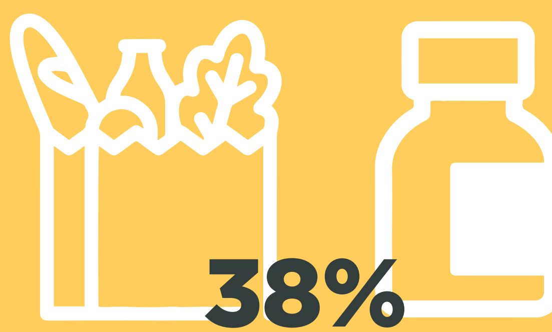
Missouri farmers participated in SNFMP in FY2020

FOOD PANTRIES IN MISSOURI

In 2021, Feeding Missouri, a nonprofit organization dedicated to alleviating hunger in the state, commissioned a study by the University of Missouri Interdisciplinary Center for Food Security to better understand food pantry clients. The study used online, telephone, and in-person surveys in the spring and summer of 2021 to gather information. They found that 54% of clients received half of their food from pantries, 41% of clients have at least one child under 18 years of age, and 17% of households included at least one veteran (Feeding Missouri).[6]

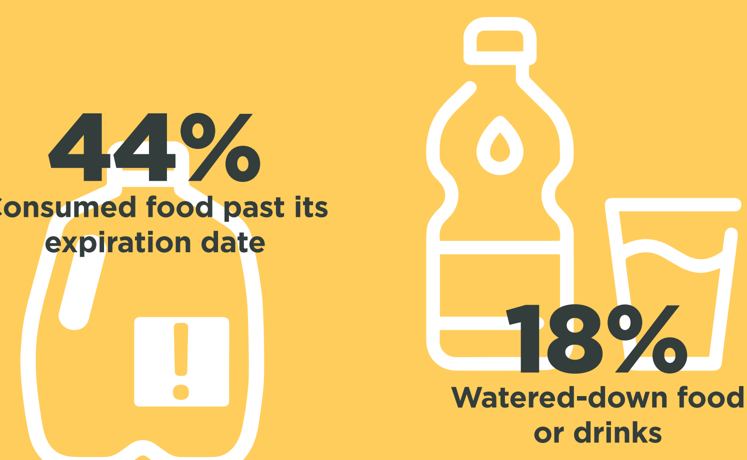
54%

Of households served in Missouri get at least half of their food from pantries



38%

Of households had to choose between food and medicine/medical care in the past year



44%

Consumed food past its expiration date

18%

Watered-down food or drinks

HEALTH & MENTAL HEALTH

Most Missourians have access to health care through employer-provided insurance, but this system leaves those at the lowest levels of income at a severe disadvantage as insurance is rarely provided by their employer. The issues with this system became apparent during the COVID pandemic, as low-income families struggled to maintain access to healthcare.

In this health care system, low-income families often pay-out-of-pocket for health care while higher income individuals receive employer subsidies.

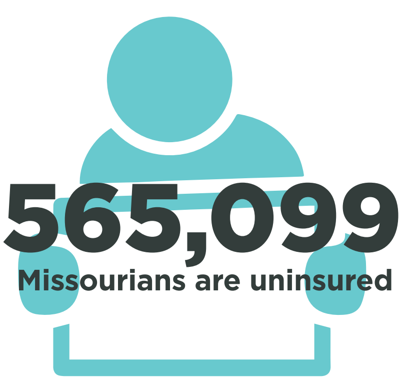
Health and longevity are influenced by income but determining the unique contributing factor can be difficult because income and health intersect with many other social determinants of health, including access to housing, workplace safety, racial segregation, social support, food insecurity, and more.

HEALTH INSURANCE COVERAGE IN MISSOURI

Most Missourians receive health insurance coverage through employer-sponsored plans, but this system leaves those at the lowest levels of income at a severe disadvantage as insurance is rarely provided for part-time employees. At the federal level, Medicare provides coverage to seniors. At the state level, Medicaid covers citizens at 138% of the federal poverty level. Together, 90.6% of Missourians are insured (US Census Bureau).[1]

90.6%

Of Missourians are insured



565,099

Missourians are uninsured

MEDICAID IN MISSOURI

MO Healthnet is Missouri's Medicaid program. In November 2020, Missourians approved a constitutional amendment that increased eligibility for the public health program to 138% of the federal poverty level. According to the Missouri Department of Social Services, 1,146,253 Missourians were enrolled in MO HealthNet as of November 2021 (Missouri Department of Social Services).[2]

1,146,253

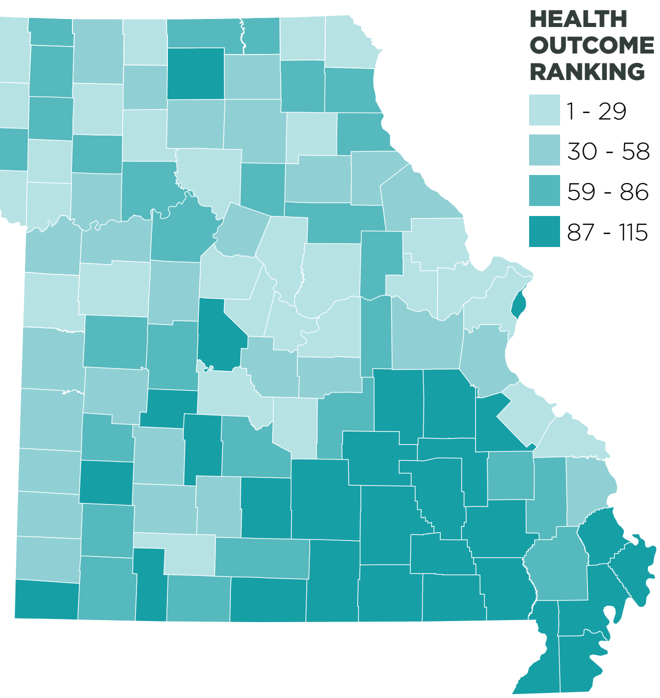
Missourians on MOHealthNet (Nov. 2021)

MISSOURI COUNTY HEALTH RANKINGS

Numerous factors impact how well and how long a person lives, from access to affordable housing or a good education for children. The County Health Rankings model, created by the University of Wisconsin Population Health Institute, shows how these factors work together to illustrate both health outcomes and health factors (University of Wisconsin Population Health Institute County Health Rankings).[3]

HEALTH OUTCOMES

Health outcomes are determined using the quality of life and the length of life. Platte County, MO is ranked 1, meaning it has the best health outcomes in the state, i.e., citizens in that county live longer and have a better quality of life compared to other counties in Missouri. Pemiscot county is ranked last at 115.



HEALTH FACTORS

Health factors represent community conditions and are measured in four categories

HEALTH BEHAVIORS

Tobacco use
Diet & exercise
Alcohol & drug use
Sexual activity

SOCIAL & ECONOMIC FACTORS

Education
Employment & income
Family & social support
Community safety

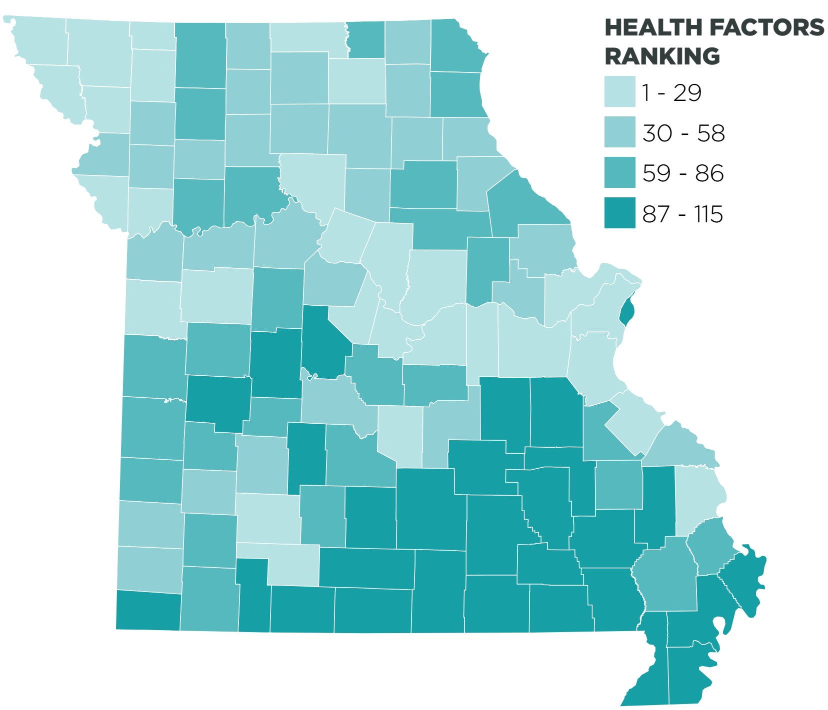
CLINICAL CARE

Access to care
Quality care

PHYSICAL ENVIRONMENT

Air & water quality
Housing & transit

The county with the highest ranking has factors in its communities that lead to positive health outcomes. Conversely, the lowest ranked county has many factors that negatively impact its citizens' health.



MENTAL HEALTH AND SUBSTANCE ABUSE IN MISSOURI

The Status Report on Missouri's Substance Use and Mental Health is published by the Missouri Department of Mental Health to gauge the prevalence of substance abuse and mental health disorders in the state. The report released in 2021 captured data during 2020, the initial year of the COVID pandemic (Missouri Department of Mental Health).[4]

22.7%
Missourians over 18 suffer from a mental illness

5.6%
Of Missourians over 18 suffer from a serious mental illness

24.1%
Of Missouri population ages +12 binge drank in the past month

19.7%
Of Missouri population ages +12 smoked a cigarette in the past month

10.6%
Of Missouri population ages +12 used illicit drugs

HOUSING & ENERGY

What happens when your housing is unaffordable, affordable housing does not exist, or you face the choice between rent and food? What if you're one paycheck or emergency away from eviction? In the worst case, you could be homeless. In many other cases, you will likely have to settle for substandard housing, including a home that is energy inefficient.

Even with stable housing, there's a strong correlation between homeownership and wealth. Young adults' homeownership rate increases with household income. This effect is compounded by parental homeownership status. Income disparities also perpetuate disparities in housing.

The COVID-19 pandemic highlighted the precarious housing situation of millions of Americans. In response to the economic fallout, the federal government and numerous states and municipalities instituted eviction bans. However, even with these measures, one in six adults in the US were behind on rent as of information collected in Sept.-Oct. 2021 (Food Research and Action Center).[1]

HOUSING AND FAMILY LIVING ARRANGEMENTS IN MISSOURI (US Census Bureau)[2]

2,804,664

Housing Units in Missouri

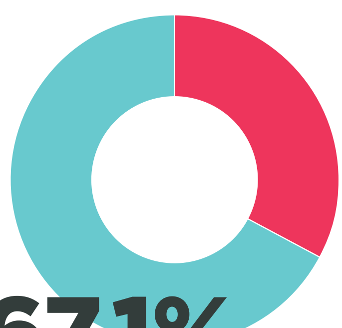
2,440,212

Households in Missouri

Media value of home

32.9%

Households in Missouri are renters



67.1%

Owner Occupied

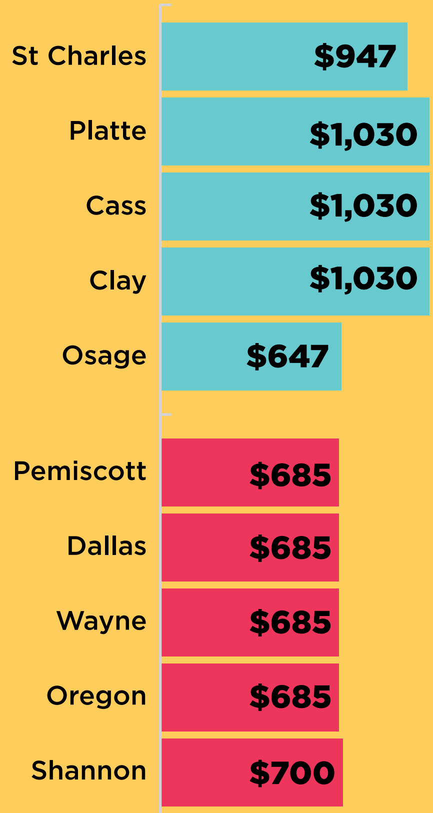
$1,287

Average mortgage in Missouri

PRICE OF HOUSING

The price of housing varies greatly by location. Here is the fair market rent for a 2-bedroom apartment for the 5 counties with the lowest poverty rate and the 5 counties with the highest poverty rates (HUD).[3]

Fair Market Rent for 5 lowest poverty rate counties and 5 highest poverty rate counties
(Effective April 1, 2021)



AVERAGE RENT IN MISSOURI AND AFFORDABILITY

$843

Median monthly rent in Missouri[2]

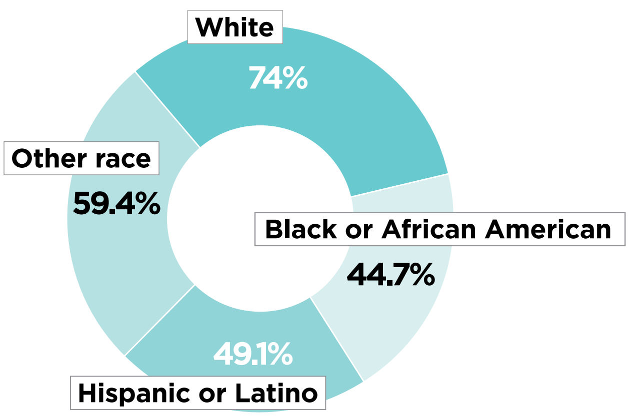
36%

Of Missourians spend more than one third (1/3) of their income on rent[2]

HOMEOWNERSHIP BY RACE AND ETHNICITY

Homeownership matters. Owning a home is an important tool for building financial stability. Homeownership impacts future generations. Young adults are more likely to own a home if their parents were homeowners. Homeownership also plays a critical role in the intergenerational transfer of wealth. Disparities in homeownership rates among races and ethnicities reflect historic poverty trends for the same demographics. Black Americans face a higher poverty rate and a lower homeownership rate (Federal Reserve Economic Data).[4]

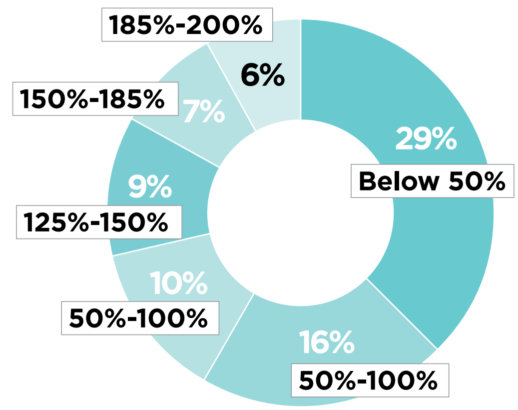
Homeownership Rates in America (2020)[4]

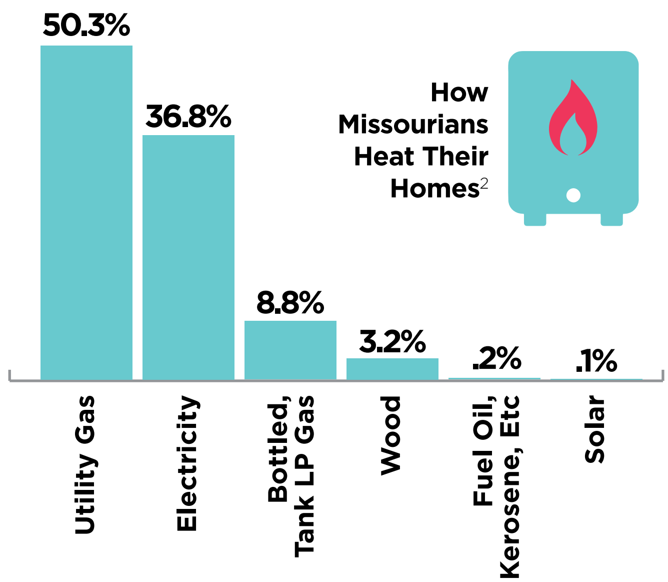


ENERGY BURDEN

The cost of home energy is a significant financial burden for low-income Missouri households. Missouri households with incomes of below 50% of the federal poverty level pay 29% of their annual income on their home energy bills. Low-income households are not the only ones affected by energy unaffordability. Bills for households with incomes between 150% and 185% of the federal poverty level pay 7% of their income; households with incomes between 185% and 200% of the federal poverty level pay 6% of their income. The percentage of income spent on home energy costs for people with higher income levels is 3% (US Census Bureau).[2]

Home Energy Burden to Poverty Level





MISSOURI FAIR MARKET RENT AND HOUSING WAGE

The Out of Reach Report, published by the National Low-Income Housing Coalition, outlines the hourly wage one must make in each state to afford a 1- or 2-bedroom rental home without paying more than 30% of income on housing. In 2021, the fair market rent (FMR) for a two-bedroom apartment is $867. To afford this level of rent and utilities—without paying more than 30% of income on housing—a household must earn $16.66 hourly to afford a two-bedroom apartment at fair market rent. This is known as the state housing wage (National Low-Income Housing Coalition)[5].

65 Hours
Per week at minimum wage to afford a 2-bedroom rental home

$16.66 vs **$11.15**

State housing wage — **Minimum wage** (2021)

1.6 FULL-TIME JOBS
At minimum wage to afford a 2-bedroom rental home (at FMR)

Rent affordable to SSI recipient $238

$536 Rent affordable with full-time job paying minimum wage

THE SOCIAL SAFETY NET

The term social safety net refers to assistance provided to vulnerable families and individuals to improve their lives. Many programs comprise this "net," including unemployment, SNAP, Medicare, and more. Social security is the largest social insurance safety net program in the United States.

During the COVID-19 pandemic, the federal government invested billions into social safety net programs to prevent millions of Americans from falling into poverty. The measures included increased unemployment benefits, SNAP funds, LIHEAP support, and rental/mortgage assistance. It was the largest push to help working families and individuals since the New Deal policies enacted by President Franklin D. Roosevelt.

There is much debate over the efficacy of these programs. The waters are even more muddied by a lack of timely data. There is often a 2–3-year lag in information on utilization of programs and their effect on families and local communities. This prevents policymakers from having an accurate picture of how services help, or don't help, low-income citizens.

The programs are often underfunded and underutilized. For example, only 16.1% of the total eligible population in Missouri received LIHEAP in 2020. Meanwhile, only 57.1% of eligible families in the US use WIC. In Missouri, around 13% of eligible individuals don't participate in the WIC program.

LIHEAP

The Low-Income Home Energy Assistance Program (LIHEAP) is a federally funded program that assists low-income households with paying their utility bills. The program plays a critical part in helping individuals in poverty pay their energy costs. In FY2020, LIHEAP benefits in Missouri prevented the loss of service 76,145 times.

As of Aug. 1, 2021, the average annual LIHEAP benefit was $334. This was less than the average benefit for high burden households, which is $313. In fact, LIHEAP assistance pays a smaller share of the home energy bill for high burden households. ([Dept. Of Health and Human Services](#)).[3]

LIHEAP by the Numbers [1]

$334
Average annual LIHEAP benefit

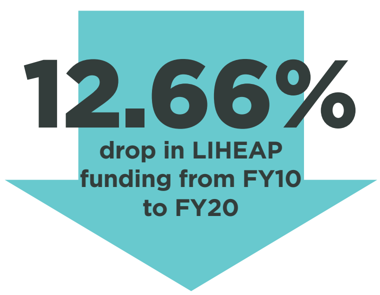
$83,198,518
Gross LIHEAP allocation

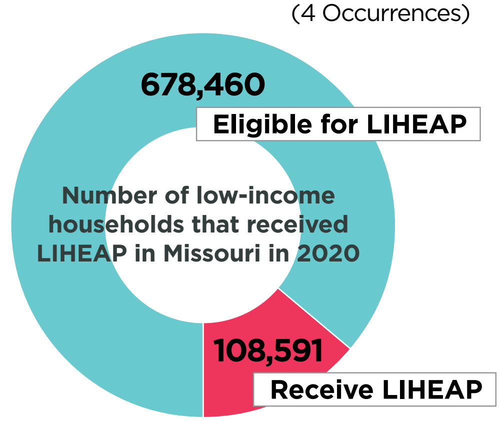
As a result of Bill Pay Assistance

87% Prevention (76,145 Occurrences) — **13% Restoration** (11,479 Occurrences)

As a result of Equipment repair or replacement

89% Prevention (31 Occurrences) — **11% Restoration** (4 Occurrences)

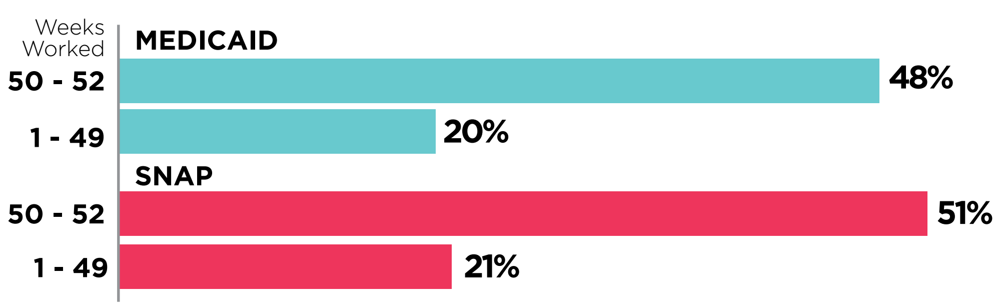




WORKING POOR

Most of the recipients in safety net programs are employed. According to the U.S. Government Accountability Office, approximately 70 percent of adult wage earners enrolled in SNAP and Medicaid worked full-time hours (35 hours or more a week) ([US GAO](#)).[2]

Estimated percentage of wage-earning enrollees/recipients (Ages 19-64)



Of LIHEAP recipients in Missouri:

77%
Have at least one vulnerable member

33.8%
Have an elderly members (60+ years of age)

53.2%
Have at least one disabled member

18.3%
Have at least one child under six

11%
of state population on SNAP
698,700 Missouri residents used SNAP (FY 2021)

42%
Are in working families

71%
SNAP participants are in families with children

WOMEN, INFANTS, AND CHILDREN PROGRAM

The Special Supplemental Nutrition Program for Women, Infants, and Children (WIC) is a federal nutrition program that provides low-income nutritionally at-risk pregnant women, postpartum mothers, infants, and children up to 5 years old with nutritious foods, nutrition education, breastfeeding support, and referrals to health care. Despite the importance of the program, it is underutilized, and participation continues to drop. In 2018, around 57% of eligible individuals in the US received WIC, and just 44.2% of eligible children. (Food Research and Action Center).[4]

$25.59
Average monthly benefit per person in Missouri

-9.7%
Decrease in participation nationally from 2020-2021

104,293 (Mar. 2019 – Feb. 2020 average) **VS** **94,223** (Mar. 2020 – Feb. 2021 average)

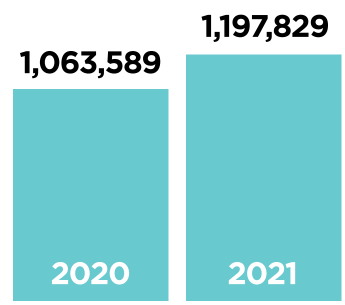
$2.8 Billion
infused into local economies through WIC (nationwide)

MEDICAID EXPANSION

MO HealthNet is Missouri's Medicaid system, which provides healthcare to citizens under a certain percent of the federal poverty level. In November 2020, Missouri voters approved a constitutional amendment that increased eligibility to 138% of the federal poverty level, expanding access to approximately 275,000 Missourians.

19,200
Fewer deaths for states that expanded Medicaid than those who didn't (CBPP)[5]

15,600
Estimated deaths attributed in non-expansion states to the failure to provide Medicaid coverage [5]



Missourians eligible for Medicaid (Missouri Department of Social Service)[6]

SNAP

The Supplemental Nutrition Assistance Program (SNAP) provides low-income families with benefits to purchase sufficient food. The program helps 13% of the total population in the United States afford groceries. In Missouri, 11% of the population participates in SNAP. Around 13% of eligible individuals do not participate in the program (CBPP).[7]

COVID-19 + IMPACT

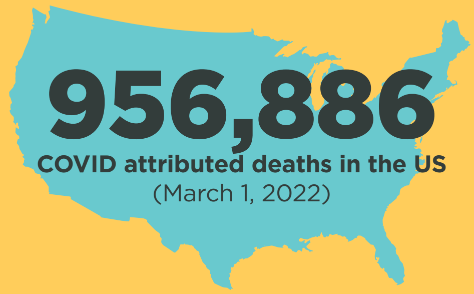
On January 20, 2020, the first COVID case was reported in the United States. By March a national emergency was declared, and Congress acted quickly to assist millions of Americans who were suddenly without work or income.

Meanwhile, hospitals overflowed with patients. By January 1, 2021, 6,899 Missourians had lost their life to the virus. That number would increase to 16,074 by the end of 2021 (CDC).[1]

We are still examining the effects of COVID on poverty. There has always been a delay in receiving data, but the pandemic exacerbated the lag in information. The 2020 Census experienced difficulties in collecting data due to concerns around COVID.

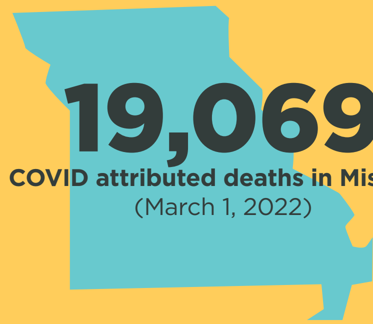
It will take years for us to truly understand the full effect of the pandemic on people in poverty. We are beginning to get an idea of COVIDs impact on Missouri's low-income citizens and the federal government's subsequent response.

COVID-19 DEATHS[1]



956,886

COVID attributed deaths in the US
(March 1, 2022)



19,069

COVID attributed deaths in Missouri
(March 1, 2022)

GOVERNMENT RESPONSE TO COVID

As businesses, schools, and other organizations closed their doors, Americans were faced with record unemployment. The job loss was immediate and widespread. The loss of income placed millions of citizens in danger of falling into poverty. In response, the federal government enacted a series of measures directed at assisting families and individuals. The Coronavirus Aid Relief and Economic Security (CARES) Act was signed into law on March 27, 2021. The $2 trillion legislation provided grants to help small businesses and nonprofits, direct stimulus payments to individuals, billions in food programs, and funds to state and local governments to respond to the emergency (Center for American Progress).[2]

5.5M

Kept out of poverty by unemployment insurance

11.7M

People lifted out of poverty by the first two stimulus checks

5.3M

People kept above poverty line by refundable tax credits

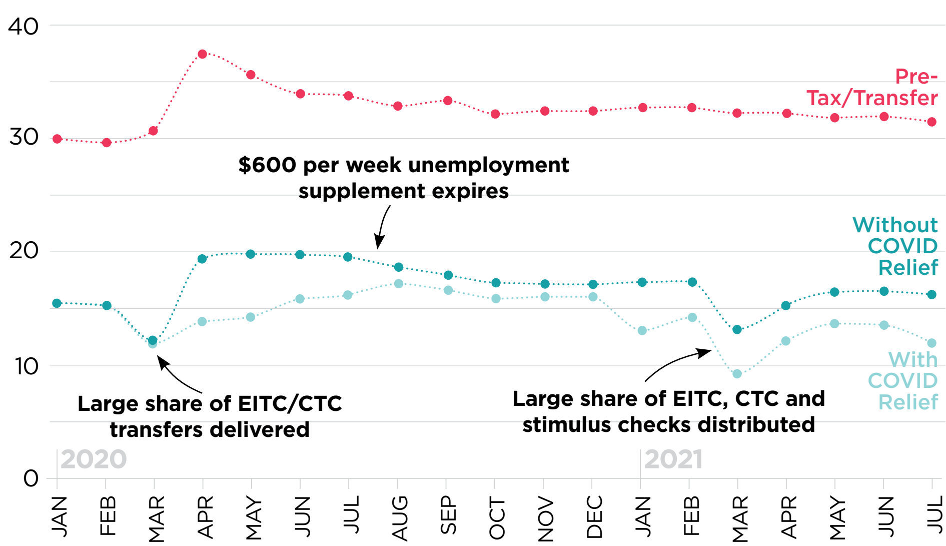
POVERTY RATE DURING COVID

According to the Center for Budget and Policy Priorities, the federal government's response to the COVID pandemic prevented an estimated 53 million people out of poverty during 2020. Without that assistance, the poverty rate would have increased during the same period by 2.8%. In short, the government's assistance had its intended effect—citizens were stopped from falling into poverty.

However, the assistance did little for families already living in poverty, especially those unable to access the increased benefits and stimulus payments. The CARES assistance was temporary, meaning those families that were lifted out of poverty faced the same factors that put them into poverty once the benefits ended.

There were differences in the poverty rate depending on which measure was used. During 2020, the official poverty measure (OPM) increased by 1%, from 10.5% to 11.4%. Meanwhile, the supplemental poverty measure (SPM) shows that poverty decreased from 11.8% in 2019 to 9.1% in 2020, thanks to historic federal aid. (Center for American Progress).[2]

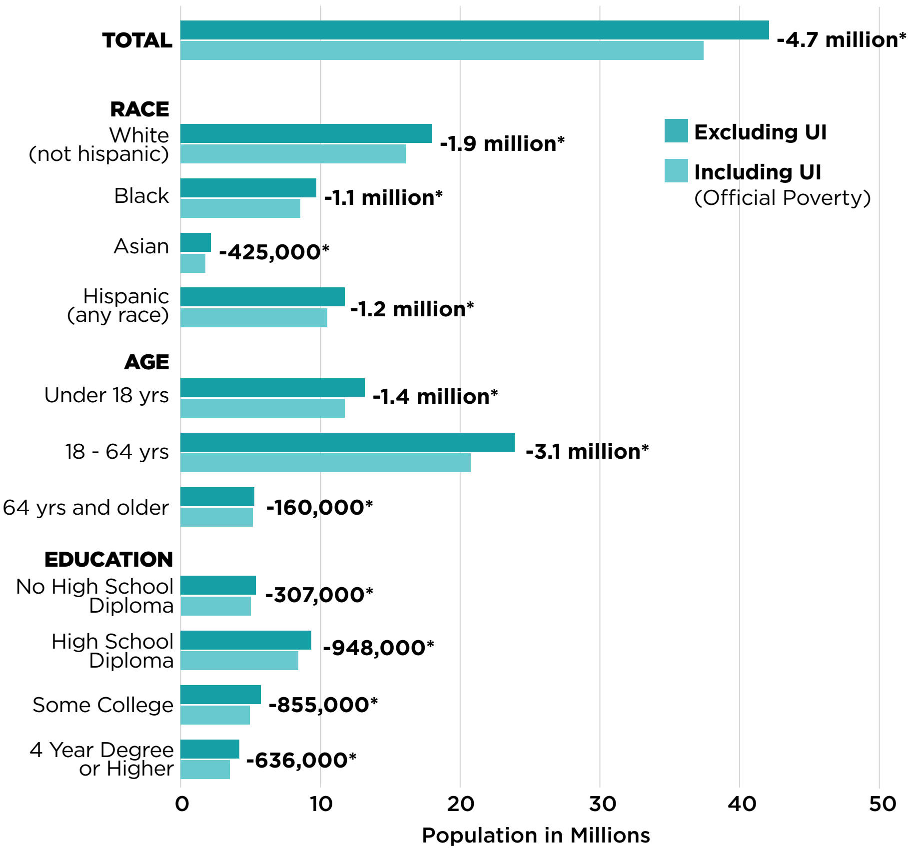
Monthly Poverty Rate During COVID-19 (Food Research and Action Center)[3]



UNEMPLOYMENT AND COVID

When COVID-19 first began, shutdowns throughout the country resulted in extensive job loss. In response, the federal government enacted the Coronavirus Aid, Relief, and Economic Security (CARES) Act. The measure expanded unemployment insurance by $600/per week, increased eligibility, and extended the benefits for 13 weeks. The payments lowered the overall poverty rate by 1.4%. Without unemployment insurance, 4.7 million people would have been in poverty (Center for American Progress).[2]

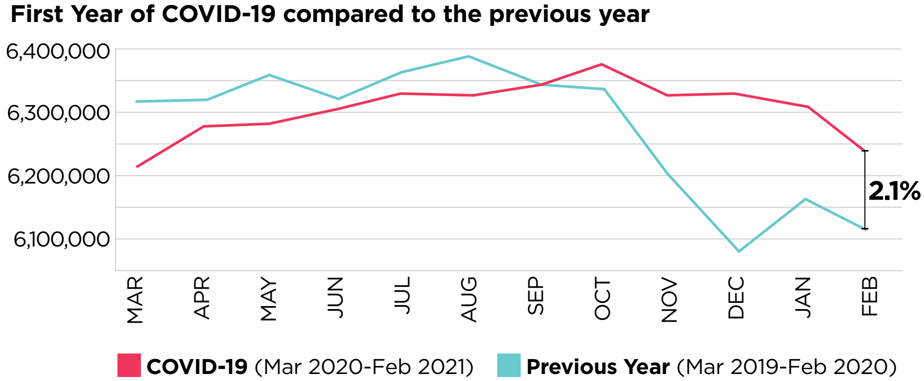
Impact of Unemployment Insurance (UI) on the number of people in Poverty: 2020 (Population as of March of the following year)



WIC PARTICIPATION DURING COVID

During the pandemic, WIC waivers increased access to the benefits, resulting in a national 2.1% increase in participation. Yet here in Missouri, the number of recipients fell by 12.6%. (Food Research and Action Center).[4]

Total Number of WIC Participants by Month, First Year of COVID-19 compared to the previous year



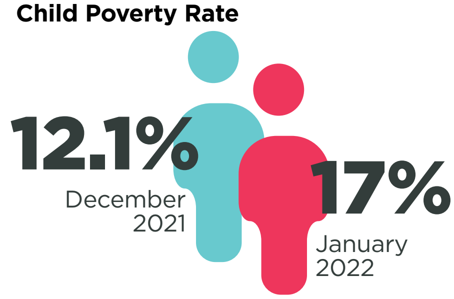
ENHANCED CHILD TAX CREDIT

In March 2021, Congress approved the American Rescue Plan Act (ARPA), the second measure passed by the federal government in response to the COVID pandemic. Among the provisions, ARPA expanded the Child Tax Credit (CTC) so more families would receive it, increased the amount, and eliminated the requirement for taxpayers to have at least earned $2500 in income to claim the credit.

The results were immediate. The first payment in July 2021 kept 3.8 million children from poverty. The child poverty rate fell from 15.9% in June 2021 to 12.2% in Nov. 2021. (Columbia University Center on Poverty & Social Policy)[5]

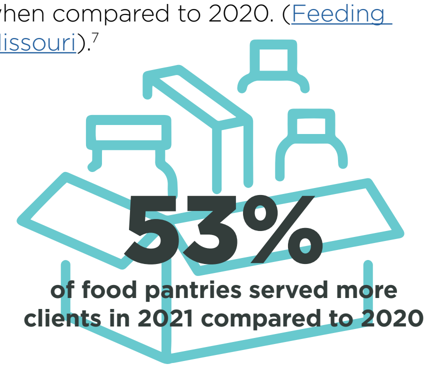
Within the first month of the benefits ending in January 2022, child poverty increased from 12.1% to 17%. (Columbia University Center on Poverty and Social Policy).[6]

Child Poverty Rate



FOOD PANTRIES DURING COVID

The Food Assistance & Hunger in the Heartland 2021 Report provides an idea of how food insecurity affected Missourians during the pandemic. The study gathered data from clients and pantries on characteristics of pantries and clients. It found food pantry use increased sharply during 2021 when compared to 2020. (Feeding Missouri).[7]



CONCLUSION

The Missouri Poverty Report provides a starting point to analyze the level of poverty in the state and the impacts of COVID-19. In March 2020, the Pandemic led to the declaration of a national emergency. As businesses and organizations closed, unemployment skyrocketed from 3.7% to 12.5%. Families faced limited access to food. Individuals couldn't afford rent or mortgages. These difficulties were faced by all Missourians, but disproportionately impacted low-income families.

The federal government provided more than $2 trillion in assistance to individuals, families, and businesses. It was the largest expansion of the social safety net since the 1930s. It is estimated that 5.5 million people nationally were kept above the poverty line through unemployment insurance, and 11.7 million were lifted out of poverty by the first two stimulus checks. The enhanced child tax credit, paid in monthly installments, significantly lowered child poverty.

Then those programs expired. Within the first month of ending the enhanced CTC, child poverty jumped by 41%. Meanwhile, households with low incomes have been slower to recover jobs from the pandemic than high wage earners. Employers report difficulty in finding qualified workers and the unemployed struggle with childcare, transportation, and the skills needed for the available jobs.

Missouri CAN looks forward to working with the Governor, the Legislature, advocates, and concerned citizens to strengthen anti-poverty measures that can expand opportunity and economic security to all Missourians.

For more information on this report or on Missouri CAN's work to fight poverty please contact info@communityaction.org of call 573.634.2969.

MISSOURI COMMUNITY ACTION NETWORK

Missouri Community Action Network is the state association for Missouri's Community Action agencies. Community Action Agencies provide services at the local level to help lift people out of poverty. Nineteen (19) Community Action Agencies cover every county in the state, ensuring no Missourian is without access to the tools they need to lead financially stable lives. MCAN educates Missouri on the impact of poverty and advocates on behalf of low-income citizens. For more information on MCAN, including how to get involved in Community Action, visit www.communityaction.org or email info@communityaction.org. To find your local Community Action Agency, visit www.communityaction.org/gethelp.

Community Action Agencies throughout Missouri provide citizens paths out of poverty through local services, including utility assistance, rental assistance, Head Start, Weatherization, job training through SkillUp, and more.

If you or someone you know is struggling, visit **www.communityaction.org/gethelp** to find the closest agency.

GET HELP

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MISSOURI

THE HOME ENERGY AFFORDABILITY GAP 2021

(2ND SERIES) PUBLISHED APRIL 2022

Finding #1

Poverty Level	Home Energy Burden
Below 50%	29%
50 – 100%	16%
100 – 125%	10%
125 – 150%	9%
150 – 185%	7%
185% - 200%	6%

Home energy is a crippling financial burden for low-income Missouri households. Missouri households with incomes of below 50% of the Federal Poverty Level pay 29% of their annual income simply for their home energy bills.

Home energy unaffordability, however, is not only the province of the very poor. Bills for households with incomes between 150% and 185% of Poverty take up 7% of income. Missouri households with incomes between 185% and 200% of the Federal Poverty Level have energy bills equal to 6% of income.

Finding #2

Poverty Level	Number of Households	
	Last Year	This Year
Below 50%	144,545	144,545
50 – 100%	188,708	188,708
100 – 125%	110,407	110,407
125 – 150%	106,824	106,824
150 – 185%	160,114	160,114
185% - 200%	68,988	68,988
Total < 200%	779,586	779,586

The number of households facing unaffordable home energy burdens is staggering. According to the most recent five-year American Community Survey, nearly 145,000 Missouri households live with income at or below 50% of the Federal Poverty Level and face a home energy burden of 29%. And nearly 189,000 *additional* Missouri households live with incomes between 50% and 100% of the Federal Poverty Level and face a home energy burden of 16%.

In 2021 the total number of Missouri households below 200% of the Federal Poverty Level stayed relatively constant from the prior year.

Finding #3

Home Energy Affordability Gap: 2011 (base year)	$665,722,385	
Home Energy Affordability Gap: 2021 (current year)	$765,833,385	
Home Energy Affordability Gap Index (2011 = 100)	115.0	

The Home Energy Affordability Gap Index (2nd Series) indicates the extent to which the Home Energy Affordability Gap has increased between the base year and the current year. In Missouri, this Index was 115.0 for 2021.

The Home Energy Affordability Gap Index (2nd Series) uses the year 2011 as its base year. The Index for 2011 is set equal to 100. A current year Index of more than 100 thus indicates that the Home Energy Affordability Gap for has increased since 2011. A current year Index of less than 100 indicates that the Home Energy Affordability Gap has decreased since 2011.

Finding #4

	Last Year	This Year
Gross LIHEAP Allocation ($000's)	$74,048	$74,937
Number of Households <150% FPL	550,484	550,484
Heating/Cooling Bills "Covered" by LIHEAP	94,570	91,834

Existing sources of energy assistance do not adequately address the Home Energy Affordability Gap in Missouri. LIHEAP is the federal fuel assistance program designed to help pay low-income heating and cooling bills. The gross LIHEAP allocation to Missouri was $74.9 million in 2021 and the number of average annual low-income heating and cooling bills "covered" by LIHEAP was 91,834.

In comparison, the gross LIHEAP allocation to Missouri in 2020 reached $74.0 million and covered 94,570 average annual bills.

Finding #5

Primary Heating Fuel	Penetration by Tenure	
	Owner	Renter
Electricity	29%	50%
Natural gas	54%	43%
Fuel Oil	0%	0%
Propane	11%	5%
All other	6%	2%
Total	100%	100%

The Home Energy Affordability Gap in Missouri is not solely a function of household incomes and fuel prices. It is also affected by the extent to which low-income households use each fuel. All other things equal, the Affordability Gap will be greater in areas where more households use more expensive fuels.

In 2021, the primary heating fuel for Missouri homeowners was Natural Gas (54% of homeowners). The primary heating fuel for Missouri renters was Electricity (50% of renters).

Changes in the prices of home energy fuels over time are presented in Finding #6 below.

Finding #6

Fuel	2019 Price	2020 Price	2021 Price
Natural gas heating (ccf)	$0.892	$0.867	$0.855
Electric heating (kWh)	$0.096	$0.098	$0.102
Propane heating (gallon)	$1.869	$1.646	$1.947
Fuel Oil heating (gallon)	$2.657	$2.626	$2.607
Electric cooling (kWh)	$0.134	$0.130	$0.134

In Missouri, natural gas prices stayed relatively constant during the 2020/2021 winter heating season. Fuel oil prices stayed relatively constant and propane prices rose 18.3%.

Heating season electric prices rose modestly 4.1% in the same period and cooling season electric prices rose 3.1%.

Home Energy Affordability Gap Dashboard -- Missouri 2021 versus 2020

AVERAGE DOLLAR AMOUNT BY WHICH ACTUAL HOME ENERGY BILLS EXCEEDED AFFORDABLE HOME ENERGY BILLS FOR HOUSEHOLDS BELOW 200% OF POVERTY LEVEL.

2020: $808 per household

2021: $982 PER HOUSEHOLD

AVERAGE TOTAL HOME ENERGY BURDEN FOR HOUSEHOLDS BELOW 50% OF POVERTY LEVEL.

2020: 27% of household income

2021: 29% OF HOUSEHOLD INCOME

PERCENT OF INDIVIDUALS BELOW 100% OF POVERTY LEVEL.

2020: 14% of all individuals

2021: 14% OF ALL INDIVIDUALS

NUMBER OF AVERAGE LOW-INCOME HEATING/COOLING BILLS COVERED BY FEDERAL HOME ENERGY ASSISTANCE.

2020: 94,570 bills covered

2021: 91,834 BILLS COVERED

PRIMARY HEATING FUEL (2021):

HOMEOWNERS - NATURAL GAS *** TENANTS - ELECTRICITY

NOTES AND EXPLANATIONS

The 2012 Home Energy Affordability Gap, published in May 2013, introduced the 2nd Series of the annual Affordability Gap analysis. The 2012 Home Energy Affordability Gap going forward cannot be directly compared to the Affordability Gap (1st Series) for 2011 and earlier years. While remaining fundamentally the same, several improvements have been introduced in both data and methodology in the Affordability Gap (2nd Series).

The most fundamental change in the Home Energy Affordability Gap (2nd Series) is the move to a use of the American Community Survey (ACS) (5-year data) as the source of foundational demographic data. The Affordability Gap (1st Series) relied on the 2000 Census as its source of demographic data. The ACS (5-year data) offers several advantages compared to the Decennial Census. While year-to-year changes are smoothed out through use of 5-year averages, the ACS nonetheless is updated on an annual basis. As a result, numerous demographic inputs into the Affordability Gap (2nd Series) will reflect year-to-year changes on a county-by-county basis, including:

- The distribution of heating fuels by tenure;
- The average household size by tenure;
- The number of rooms per housing unit by tenure;
- The distribution of owner/renter status;
- The distribution of household size;
- The distribution of households by ratio of income to Poverty Level;

Data on housing unit size (both heated square feet and cooled square feet) is no longer calculated based on the number of rooms. Instead, Energy Information Administration/Department of Energy (EIA/DOE) data on square feet of heated and cooled living space per household member is used beginning with the Home Energy Affordability Gap (2nd Series). A distinction is now made between heated living space and cooled living space, rather than using total living space.

The change resulting in perhaps the greatest dollar difference in the aggregate and average Affordability Gap for each state is a change in the treatment of income for households with income at or below 50% of the Federal Poverty Level. In recent years, it has become more evident that income for households with income below 50% of Poverty Level is not normally distributed. Rather than using the mid-point of the Poverty range (i.e., 25% of Poverty Level) to determine income for these households, income is set somewhat higher (40% of Poverty). By setting income higher, both the average and aggregate Affordability Gap results not only for that Poverty range, but also for the state as a whole, will be lower. The Affordability Gap results for other Poverty ranges remain unaffected by this change.

Another change affecting both the aggregate and average Affordability Gap is a change in the definition of "low-income." The Home Energy Affordability Gap (2nd Series) has increased the definition of "low-income" to 200% of the Federal Poverty Level (up from 185% of Poverty). While this change may increase the aggregate Affordability Gap, it is likely to decrease the average Affordability Gap. Since more households are added to the analysis, the aggregate is likely to increase, but since the contribution of each additional household is less than the contributions of households with lower incomes, the overall average will most likely decrease.

Most of the Home Energy Affordability Gap calculation remains the same. All references to "states" include the District of Columbia as a "state." Low-income home energy bills are calculated in a two-step process: First, low-income energy consumption is calculated for the following end-uses: (1) space heating; (2) space cooling; (3) domestic hot water; and (4) electric appliances (including lighting and refrigeration). All space cooling and appliance consumption is assumed to involve only electricity. Second, usage is multiplied by a price per unit of energy by fuel type and end use by time of year. The price of electricity, for example, used for space cooling (cooling months), space heating (heating months), and appliances (total year) differs to account for the time of year in which the consumption is incurred.

Each state's Home Energy Affordability Gap is calculated on a county-by-county basis. Once total energy bills are determined for each county, each county is weighted by the percentage of persons at or below 200% of the Federal Poverty Level to the total statewide population at or below 200% of the Federal Poverty Level to derive a statewide result. Bills are calculated by end-use and summed before county weighting.

LIHEAP comparisons use gross allotments from annual baseline LIHEAP appropriations as reported by the federal LIHEAP office. They do not reflect supplemental appropriations or the release of LIHEAP "emergency" funds. The number of average heating/cooling bills covered by each state's LIHEAP allocation is determined by dividing the total base LIHEAP allocation for each state by the average heating/cooling bill in that state, the calculation of which is explained below. No dollars are set aside for administration; nor are Tribal set-asides considered.

State financial resources and utility-specific rate discounts are not considered in the calculation of the Affordability Gap. Rather, such funding should be considered available to fill the Affordability Gap. While the effect in any given state may perhaps seem to be the same, experience shows there to be an insufficiently authoritative source of state-by-state data, comprehensively updated on an annual basis, to be used as an input into the annual Affordability Gap calculation.

Energy bills are a function of the following primary factors:

- Tenure of household (owner/renter)
- Housing unit size (by tenure)
- Heating Degree Days (HDDs) and Cooling Degree Days (CDDs)
- Housing size (by tenure)
- Heating fuel mix (by tenure)
- Energy use intensities (by fuel and end use)

Bills are estimated using the U.S. Department of Energy's "energy intensities" published in the DOE's Residential Energy Consumption Survey (RECS). The energy intensities used for each state are those published for the Census Division in which the state is located. Heating Degree Days (HDDs) and Cooling Degree Days (CDDs) are obtained from the National Weather Service's Climate Prediction Center on a county-by-county basis for the entire country.

End-use consumption by fuel is multiplied by fuel-specific price data to derive annual bills. State price data for each end-use is obtained from the Energy Information Administration's (EIA) fuel-specific price reports (e.g., Natural Gas Monthly, Electric Power Monthly). State-specific data on fuel oil and kerosene is not available for all states. For those states in which these bulk fuels have insufficient penetration for state-specific prices to be published, prices from the Petroleum Administration for Defense Districts (PADD) of which the state is a part are used.

The Home Energy Affordability Gap Index (2nd Series) uses 2011 as its base year. The base year (2011) Index has been set equal to 100. A current year Index of more than 100 thus indicates that the Home Energy Affordability Gap has increased since 2011. A current year Index of less than 100 indicates that the Affordability Gap has decreased since 2011. The Affordability Gap Index was, in other words, re-set in 2011. The Affordability Gap Index (2nd Series) for 2012 and beyond cannot be compared to the Affordability Gap Index (1st Series) for 2011 and before.

The Home Energy Affordability Gap is a function of many variables, annual changes in which are now tracked for nearly all of them. For example, all other things equal: increases in income would result in decreases in the Affordability Gap; increases in relative penetrations of high-cost fuels would result in an increase in the Gap; increases in amount of heated or cooled square feet of living space would result in an increase in the Gap. Not all variables will result in a change in the Affordability Gap in the same direction. The annual Affordability Gap Index allows the reader to determine the net cumulative impact of these variables, but not the impact of individual variables.

Since the Affordability Gap is calculated assuming normal Heating Degree Days (HDDs) and Cooling Degree Days (CDDs), annual changes in weather do not have an impact on the Affordability Gap or on the Affordability Gap Index.

Price data for the various fuels underlying the calculation of the Home Energy Affordability Gap (2nd Series) was used from the following time periods:

Heating prices	
Natural gas	February 2021
Fuel oil ***	Week of 02/8/2021
Liquefied petroleum gas (LPG) ***	Week of 02/8/2021
Electricity	February 2021
Cooling prices	August 2021
Non-heating prices	
Natural gas	May 2021
Fuel oil ***	Week of 10/04/2021
Liquefied petroleum gas (LPG) ***	Week of 10/04/2021
Electricity	May 2021

*****Monthly bulk fuel prices are no longer published. Weekly bulk fuel prices are published during the heating months (October through March). The prices used are taken from the weeks most reflective of the end-uses to which they are to be applied. Prices from the middle of February best reflect heating season prices. Bulk fuel prices from October best reflect non-heating season prices.**

Steve Knight
10 Clerbrook Ln.
St Louis Mo 63124

January 7, 2023

Missouri Public Service Commission
200 Madison St.
Jefferson City, MO 65101

Dear Commissioners,

I'm writing to let you know of my surprise and disappointment in the way the **Evening/Morning and Anytime** rate change option was handled with consumers.

My criticism is this:
We as Ameren customers were required to make a proactive response in order to simply keep our current plan. This is exactly the opposite of what a customer would expect and want. When I saw there was an optional change, my assumption was that I would *-of course-* stay on my existing plan unless I took action. I failed to read closely, as did my 93 year old mother (another Ameren customer at 28 Deerfield Rd St Louis 63124). As a result both of us were removed from the Anytime Plan and put on the Evening/Morning Plan.

While this change wasn't financially consequential for either of us, as retirees it seemed to us like a rather sneaky way to move inattentive customers to the new plan even if it isn't to their financial benefit. A consumer focused organization would have let customers know a new option was available *if they selected it*, not forced them to have to select 'no change' in order to keep what they were accustomed to having.

Thank you for your consideration.

Respectfully,

Steve Knight

Steve Knight
10 Clerbrook Ln
St Louis MO 63124

BEFORE THE PUBLIC SERVICE COMMISSION
OF THE STATE OF MISSOURI

In the Matter of Union Electric Company d/b/a Ameren Missouri's Tariffs to Adjust its Revenues for Electric Service.	)))	Case No: ER-2022-0337

AFFIDAVIT OF JACQUELINE A. HUTCHINSON

I, the undersigned, being duly sworn, states that my name is Jacqueline A. Hutchinson and that the foregoing Direct Testimony of Jacqueline A. Hutchinson, including attachments, was prepared by me on behalf of the Consumers Council of Missouri. This testimony was prepared in written form for the purpose of its introduction into evidence in the above utility case at the Missouri Public Service Commission.

I hereby swear and affirm that the attached testimony is true and correct to my best knowledge, information, and belief, and I adopt said testimony as if it were given under oath in a formal hearing.

Jacqueline A Hutchinson
Jacqueline A. Hutchinson

Subscribed before me on this 21 day of January, 2023:

TAWANA RACHELLE LAWSON
Notary Public, Notary Seal
State of Missouri
St. Louis City
Commission # 22433082
My Commission Expires 04-17-2026

Tawana Rachelle Lawson