

Exhibit No. 802

Consumers Council of Missouri – Exhibit 802
Testimony of Jim Thomas
Direct
File No. ER-2024-0261

Exhibit No.: _____

Issues: **Affordability Concerns
Residential Rate Design
Assistance Programs**

Witness: **Jim Thomas**
Type of Exhibit: **Direct Testimony**
Sponsoring Party: **Consumers Council of
Missouri**

Case No.: **ER-2024-0261**

Date Prepared: **July 21, 2025**

DIRECT TESTIMONY

OF

JIM THOMAS

**ON BEHALF OF
THE CONSUMERS COUNCIL OF MISSOURI**

Case No. ER-2024-0261

July 21, 2025

Table of Contents

INTRODUCTION, EXPERTISE, AND PURPOSE OF TESTIMONY	3
DATA PRESENTATION.....	6
Poverty Data	6
Energy Burden Data	9
LIHEAP Data and Funding Benefits per Household	11
FEDERAL FUNDING DECISIONS AND IMPACT.....	14
RECOMMENDATIONS	16
Residential Customer Fixed Charge	16
Fees and Charges.....	17
Disconnections	17
Stakeholder and Low-Income Programs Collaborative	18
Low Income Pilot Program (LIPP), transition to Fresh Start.....	18
Critical Medical Needs Program	21
Action to Support the Elderly (EASE).....	22
Project Help	23
Community Outreach for Utility Bill Assistance Programs	24

1 **INTRODUCTION, EXPERTISE, AND PURPOSE OF TESTIMONY**

2 **Q. PLEASE STATE YOUR NAME AND BUSINESS ADDRESS.**

3 A. My name is Jim Thomas. My address is 5412 S. 37th Street, St. Louis MO 63116.

4 I was asked by Consumers Council of Missouri (Consumers Council) to provide
5 my professional opinions and recommendations regarding : (1) the affordability of
6 the rates proposed in this case for residential customers, including the effect of
7 those rates would have on low- and moderate-income customers, and (2) whether
8 Liberty's low-income customer assistance programs, as designed, are sufficient to
9 enable Liberty customers to maintain their electric service.

10 **Q. WHAT IS YOUR EDUCATIONAL BACKGROUND AND WORK EXPERIENCE?**

11 A. I earned a Bachelor of Arts degree from Oberlin College. I have been employed
12 by People's Community Action Corporation (PCAC) since 2013 and serve as
13 Director of Operations. PCAC is a Community Action Agency, receiving its
14 identifying funding from the Community Services Block Grant, a federal grant
15 distributed to and administered by the states to help families and individuals move
16 from poverty to self-sufficiency. Missouri has 19 such agencies that serve every
17 county in the state. However, I am not representing my employer in these
18 proceedings.

19 In my position at PCAC, I research and author a comprehensive Community
20 Needs Assessment every three years, manage our Strategic Planning process,
21 develop programs to meet identified needs and strategic goals, complete our

1 annual Work Plans for approval by the State of Missouri, along with other various
2 managerial responsibilities. I also provide leadership and supervision to staff who
3 provide direct assistance, including utility assistance, to families unable to meet
4 their basic needs, while providing a gateway to services to change their lives.

5 I've conducted workshops and given presentations on data aggregation,
6 management, and analysis on numerous occasions, most recently before a
7 statewide professional alliance of the Missouri Community Action Network.

8 **Q. CAN YOU EXPLAIN MORE ABOUT YOUR EXPERTISE AS IT RELATES TO THE**
9 **SUBJECT MATTER OF YOUR TESTIMONY IN THIS RATE CASE?**

10 A. I am a Certified Community Action Professional (2023) and am certified for
11 Results Oriented Management Accountability (ROMA) (2019). ROMA is a federally
12 mandated standard practice for all community action agencies, requiring that
13 programs of the agency identify numerical targets, clearly defined measures to
14 achieve those targets, services that will facilitate that achievement, and periodic
15 and regular evaluation of performance standards and achievement.

16 As mentioned above, I have the lead role in developing my agency's Community
17 Needs Assessment. The Assessment is the foundation upon which all planning,
18 program development, and program implementation are based. It is an extensive
19 and comprehensive aggregation and analysis of both qualitative and quantitative
20 data that identifies the needs of Community Action's target population, those with
21 income below 200% of the federal poverty level, the community context in which

1 they live, and the state of resources to help move them toward self-sufficiency. The
2 most recent Assessment I authored was 173 pages.

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

4 **A.** I am providing testimony for Consumers Council, a nonpartisan, nonprofit
5 corporation. Consumers Council works to build a more inclusive and equitable
6 community through coalition building, collaboration, community education and
7 empowering consumers statewide, and advocating for their interests.

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

10 **A.** Yes. I have provided testimony on similar issues and concerns in the Spire rate
11 case GR-2025-0107.

12 **Q. WHAT IS THE PURPOSE OF YOUR TESTIMONY?**

13 **A.** The purpose of my testimony is to address issues surrounding the affordability
14 of the rates Liberty is proposing for residential electric customers, including the
15 effect of those rates on low- and moderate-income customers. I also address the
16 reasonableness of the utility's proposed residential customer charge.

17 I will further provide recommendations for certain programs designed to assist
18 Liberty customers in maintaining household electric service, in the interests of
19 protecting the health, safety, and well-being of the individuals in those households.

20

DATA PRESENTATION

Q. WHAT DOES POVERTY DATA SHOW IN RELATION TO YOUR TESTIMONY?

A. This section will include data on poverty, energy burden, LIHEAP benefits, and a sampling of counties across these indicators. It is understood that Liberty does not cover every county inclusively. However, county-wide data remains the best unit of measure to understand the context of demographics for counties where Liberty maintains service.

Poverty Data

With one outlier exception (Christian County), the demographics for low- and moderate-income individuals and households fall within a rather consistent range of numbers and percentages across the 16 counties in which Liberty provides service. The indicators for the 15 counties, removing Christian from our present consideration, are all worse than statewide indicators. By certain measures, they are all worse than those for St. Louis.

In the public imagination of many Missouri citizens, St. Louis City is the signifier of poverty in the state. Conversely, southwest Missouri has the reputation of a high growth and prosperous region. And St. Louis does indeed have a very high poverty rate. St. Charles County in the St. Louis Metropolitan Area has the lowest poverty rate of any county in the state. I will use these locations as occasional comparison points. I will also sometimes reference Springfield data. Even though the city itself is not served by Liberty, it is the most important city in the region, and it is in Greene County.

Below is a table containing population and poverty rate data for the 16 counties, plus the comparison jurisdictions. It is notable that three of the counties have higher or comparable poverty rates to St. Louis City, as does Springfield. Seven other counties have poverty rates just a few points below that of St. Louis. All but Christian County have poverty rates above the statewide rate. This data is from 2023, the last year available at this writing from the US Census Bureau.

County	Population	Pov Pop	Poverty #	Poverty %
Barton	11,685	11,518	2,559	22.2%
Dallas	17,344	17,077	3,649	21.4%
Hickory	8,501	8,337	1,627	19.5%
Polk	32,109	30,677	5,486	17.9%
McDonald	23,492	23,234	3,998	17.2%
Cedar	14,440	14,227	2,417	17.0%
Barry	34,831	34,286	5,714	16.7%
Lawrence	38,392	37,512	6,202	16.5%
Saint Clair	9,451	9,146	1,489	16.3%
Jasper	125,056	122,534	19,941	16.3%
Greene	304,611	296,062	43,037	14.5%
Taney	56,382	54,559	7,870	14.4%
Dade	7,627	7,454	1,052	14.1%
Stone	31,697	31,228	4,363	14.0%
Newton	59,490	58,164	7,810	13.4%
Christian	94,422	93,742	5,864	6.3%
TOTALS	869,530	849,757	123,078	14.5%

MISSOURI	6,196,156	6,025,993	720,210	12.0%
St Louis City	281,754	272,271	53,418	19.6%
Springfield	170,178	162,351	30,815	19.0%
St Charles Co	416,659	409,161	22,665	5.5%

Pov Pop is the number of people for whom poverty level could be determined

Source: US Census Bureau, 2023 data, 1-year estimates

The next table shows poverty rates for children 0-17 years of age. This data has much wider swings, with Dallas County having an astonishingly high rate of 34.8%. Again, all except Christian have rates higher than the statewide rate.

County	Population	0-17 Total	0-17 Pov #	0-17 Pov %
Dallas	17,344	4,112	1,431	34.8%
Barton	11,685	2,677	744	27.8%
Barry	34,831	7,662	1,915	25.0%
Lawrence	38,392	9,398	2,321	24.7%
McDonald	23,492	5,875	1,406	23.9%
Polk	32,109	7,303	1,652	22.6%
Taney	56,382	11,527	2,286	19.8%
Jasper	125,056	29,871	5,783	19.4%
Cedar	14,440	3,489	642	18.4%
Stone	31,697	5,100	933	18.3%
Hickory	8,501	1,455	262	18.0%
Greene	304,611	62,566	11,125	17.8%
Newton	59,490	13,993	2,420	17.3%
Saint Clair	9,451	1,882	308	16.4%
Dade	7,627	1,583	251	15.9%
Christian	94,422	23,826	1,581	6.6%
TOTALS	869,530	192,319	35,060	18.2%

MISSOURI	6,196,156	1,343,427	193,269	14.4%
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The data for seniors is a more complicated story. The range of poverty levels between counties is much narrower and, at least at the level of 100% of the federal poverty thresholds, seniors are often significantly better off than children. However, their numbers may increase at higher poverty levels, such as 200%, which is the threshold used by Community Action Agencies.

In part this is because most seniors have some form of fixed income that keeps them from deep poverty. However, this may not take them much beyond low income or lower moderate income.

In addition, higher costs related to medical and prescription needs, special transportation, housing, and diet may present specific challenges to both seniors and the disabled.

County	Population	Sr Total	Sr Pov #	Sr Pov %
Barton	11,685	2,385	373	15.6%
Hickory	8,501	2,668	410	15.4%
Saint Clair	9,451	2,330	358	15.4%
Polk	32,109	5,587	739	13.2%
McDonald	23,492	3,619	444	12.3%
Jasper	125,056	19,837	2,382	12.0%
Barry	34,831	7,462	841	11.3%
Dade	7,627	1,732	196	11.3%
Cedar	14,440	3,331	372	11.2%
Greene	304,611	51,677	5,721	11.1%
Stone	31,697	9,747	1,069	11.0%
Lawrence	38,392	6,558	649	9.9%
Taney	56,382	12,293	1,132	9.2%
Dallas	17,344	3,488	315	9.0%
Newton	59,490	10,704	912	8.5%
Christian	94,422	16,149	934	5.8%
TOTALS	869,530	159,567	16,847	10.6%

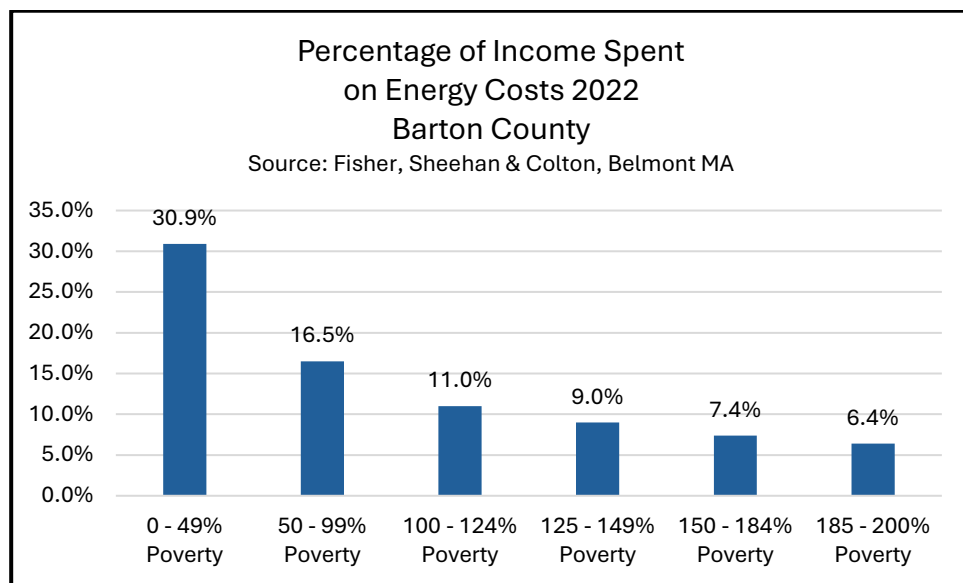
MISSOURI	6,196,156	1,102,363	119,123	10.8%
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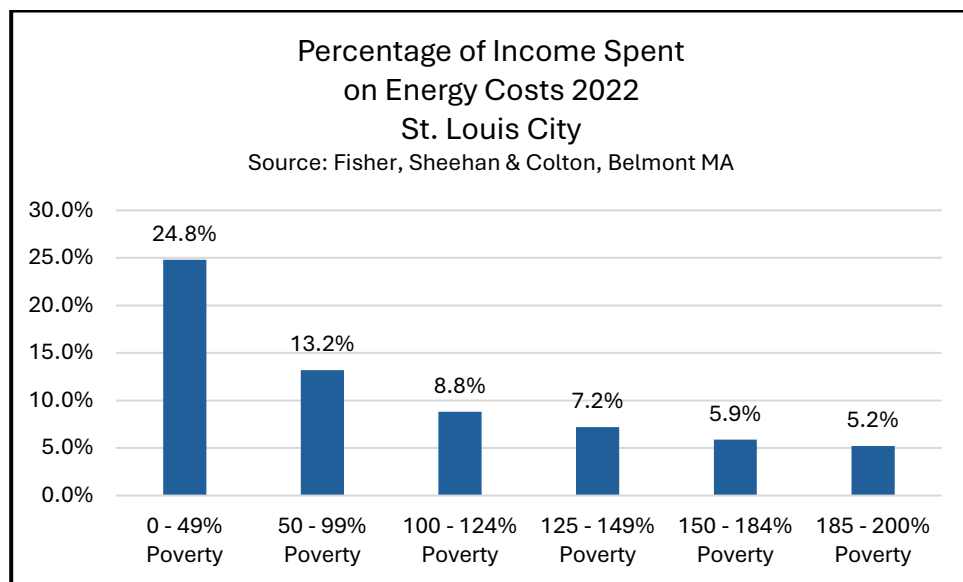
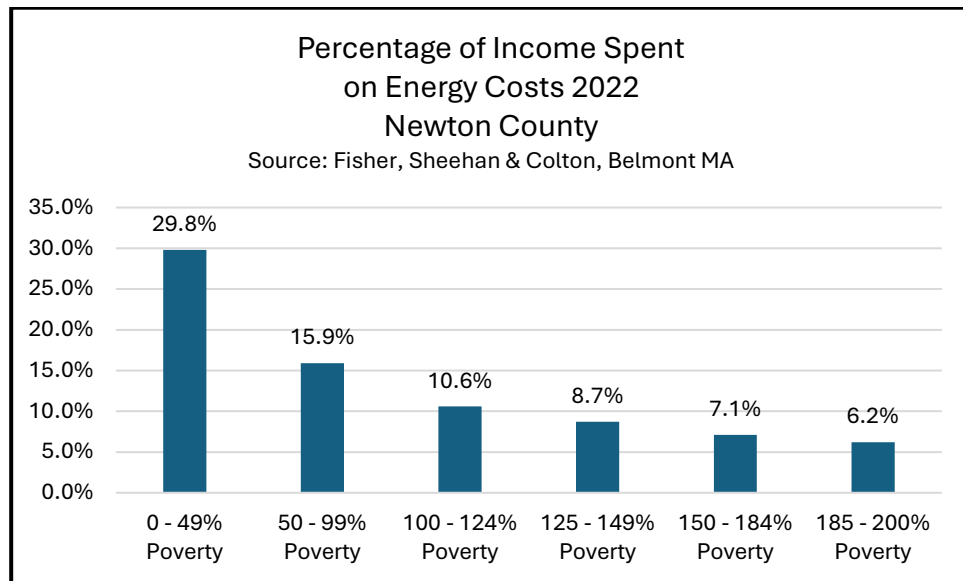
Energy Burden Data

Closely related to poverty, energy burden data shows how much of a household's income is spent on energy. As a general rule, anything above 5% is considered elevated. Of course, that is all energy spending. For electricity

1 alone, that figure might be about 2-3%. However, the data here is not able to
2 show specific spending percentages by electricity and natural gas.

3 The tables below present data from 2022, the latest year available. I've
4 chosen two counties to highlight. Setting aside Christian County as an
5 outlier, the tables are for Newton County, which has the lowest poverty rate
6 of the remaining 15 counties, and Barton County, which has the highest. I am
7 also including St. Louis City data. All 15 counties, excluding Christian, have
8 higher energy burdens across all poverty levels than St. Louis City.





LIHEAP Data and Funding Benefits per Household

The federal Low Income Home Energy Assistance Program, or LIHEAP, is the anchor program that helps customers when they are unable to pay their bill in a timely way. Utility sponsored assistance programs are much smaller in comparison. The Commission itself has used LIHEAP in its rulings as a reference point to determine eligibility for utility sponsored programs. Below

are the amounts available to households annually. Except for 2023 in the wake of the Covid pandemic, rates have mostly remained stable with two exceptions: A substantial increase in the heating minimum available to families, and a decrease in the maximum available for summer crises. Of course, electricity bill crises, relevant to this rate case, are almost always in the summer.

FFY	Heating Min	Heating Max	Crisis Winter Max	Crisis Summer Max
2018	\$45	\$450	\$800	\$300
2019	\$47	\$495	\$800	\$300
2020	\$47	\$495	\$800	\$600
2021	\$47	\$495	\$800	\$600
2022	\$47	\$495	\$800	\$600
2023	\$306	\$990	\$1,600	\$1,200
2024	\$219	\$495	\$800	\$600
2025	\$213	\$495	\$800	\$300
Source: LIHEAP State Plans, https://dss.mo.gov/fsd/energy-assistance/state-plan-liheap-lihwap-ffy.htm				
Source FFY 19 and FFY 20: LIHEAP Clearinghouse				
Source FFY 23: https://mydss.mo.gov/media/pdf/liheapstateplanfy23				

LIHEAP eligibility is set at 60% of state median income. Data is scarce by that measure; however, it does approximate relatively well the 200% poverty threshold that Community Action Agencies use more generally.

This data shows the number of **individuals** below 200% of poverty, as versus **households**, which will be shown next.

County	Population	Individuals Poverty < 200%
Barry	34,831	13,425
Barton	11,685	5,287
Cedar	14,440	6,785
Christian	94,422	21,128
Dade	7,627	3,032
Dallas	17,344	7,150
Greene	304,611	103,397
Hickory	8,501	4,650
Jasper	125,056	45,649
Lawrence	38,392	15,942
McDonald	23,492	11,414
Newton	59,490	20,685
Polk	32,109	12,558
Saint Clair	9,451	4,074
Stone	31,697	11,327
Taney	56,382	20,964
TOTALS	869,530	307,467
MISSOURI	6,196,156	1,766,563

The table below shows highly variable usage of LIHEAP that does not correspond with poverty levels. In some counties, usage seems high, at 1 in 10 households. However, the variability may be due to any number of factors. These may be whether a LIHEAP agency has an office in the county, has effective outreach (or not) to build awareness of LIHEAP, and even whether an agency runs out of LIHEAP funds, which happens. Again, this table shows **households**.

County	Total # HH	# LIHEAP	% LIHEAP
Barry	13,360	854	6.4%
Barton	4,425	454	10.3%
Cedar	5,636	364	6.5%
Christian	35,654	1,102	3.1%
Dade	3,038	201	6.6%
Dallas	6,621	557	8.4%
Greene	132,232	5,911	4.5%
Hickory	3,457	347	10.0%
Jasper	52,000	3,777	7.3%
Lawrence	14,694	855	5.8%
McDonald	8,512	727	8.5%
Newton	22,084	1,393	6.3%
Polk	11,957	914	7.6%
Saint Clair	4,090	378	9.2%
Stone	13,161	553	4.2%
Taney	22,145	1,092	4.9%
TOTALS	353,066	19,479	5.5%

MISSOURI	2,556,271	129,771	5.1%
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FEDERAL FUNDING DECISIONS AND IMPACT

Q. HOW WILL THE CURRENT PROSPECTS FOR FEDERAL FUNDING OF PROGRAMS AFFECT LIBERTY'S LOW- AND MODERATE-INCOME CUSTOMERS?

A. These customers will face great challenges.

One can accept the logic of the work requirements just added to the Medicaid and SNAP programs by the US Congress through the reconciliation bill yet acknowledge that those affected will not be able to instantaneously obtain work, or that the burden of time and paperwork to comply will force many working families who are qualified to nonetheless lose benefits. Even proponents of these

1 restrictions admit that many millions will lose benefits. That is, in fact, how funding
2 reductions are to be achieved.

3 Tax provisions around Medicaid funding are very likely to cause the elimination of
4 health care resources for rural Missourians. In addition, the Trump Administration
5 froze \$500 million in assistance to food banks, which provide major assistance to
6 local food pantries, greatly exacerbating food scarcity for those in need. The
7 “Section 8” housing choice voucher program is also proposed to be cut.

8 Having to spend more on housing, health, and food, many households will face
9 extremely hard choices from the ripple effect of program cuts. Already precarious
10 lives will be further stretched. Even a responsible working adult in a low wage job
11 can have chaos erupt when her clunker of a car gives out and must be replaced, or
12 when his daughter has a medical emergency. The fact is that utility bill
13 delinquencies are certain to skyrocket.

14 Although remaining LIHEAP funding for FY 2025 was finally released after being
15 frozen by the Trump Administration, **all** LIHEAP federal employees were fired on
16 April 1, 2025. The President has not yet proposed a full budget to Congress, but he
17 has provided a partial or “skinny” budget. In that skinny budget, the President
18 specifically cited LIHEAP for total elimination in FY 2026.

19 Community Action Agencies are the core of utility assistance programs in
20 Missouri, providing the resources (administrative support, physical facilities,
21 computers, database software and management, etc.) needed to verify customer

1 eligibility and provide enrollment. Their foundational funding is the federal
2 Community Services Block Grant, which the President has also specifically targeted
3 for elimination. Virtually all of Missouri's utility assistance programs will flounder if
4 the state's Community Action Agencies are debilitated or closed.

5 Things can change, as they sometimes do in politics, but as things stand now,
6 Missouri is headed toward a train wreck for low- and moderate-income utility
7 customers, their ability to afford and pay for their services and, frankly, for the utility
8 companies as well.

9 Each rate case contains its own set of facts and should be decided on the
10 circumstances and evidence as presented to the Public Service Commission.
11 Nonetheless, the Commission should be fully aware of the larger context in which
12 utility companies are proposing their rate changes. It is to everyone's benefit, not
13 just low-income customers, to recognize these dire circumstances, and act and
14 decide accordingly.

15 **RECOMMENDATIONS**

16 **Q. WHAT ARE YOUR RECOMMENDATIONS IN THIS CASE?**

17 A. My recommendations are based on the data and considerations provided
18 above, as well as other witness testimony in this case.

19 **Residential Customer Fixed Charge**

20 Keep the fixed residential customer charge at its present level of \$13.00.

21 The residential customer fixed charge ought to correspond only with the
22 costs of providing service specifically to a customer. As explained in the

1 testimony of Consumers Council witness Caroline Palmer, Liberty's
2 customer charge should only include the meter, customer service and billing
3 costs, along with the line to the dwelling (the "basic customer method").
4 Applying any rate increase to volumetric charges allows a customer to retain
5 greater control over their monthly bills, by engaging in conservation and
6 energy efficiency.

7 **Fees and Charges**

8 All of Liberty's reconnect charges, collection trip charges, and punitive late
9 fees should be eliminated.

10 In my experience working with customers who are low- and moderate-
11 income, such charges rarely impact bill paying behaviors, and the added
12 cost simply makes it harder to maintain essential services, or to re-establish
13 such services after disconnection.

14 Even should the Commission decide to allow retention of the fees and
15 charges in principle, given Liberty's fiasco with customer service and billing,
16 these charges in reality and at present are of highly questionable validity.
17 Thus, at least in this case, these extra charges should be eliminated until
18 such time as a new rate case might allow re-evaluation.

19 **Disconnections**

20 I recommend continuation of the moratorium on disconnections. Liberty
21 currently operates with a moratorium on disconnections. With its continuing
22 problems with customer service and billing, the moratorium must continue.

Stakeholder and Low-Income Programs Collaborative

1. Liberty should create a Low-Income Programs Collaborative beyond or in place of its annual stakeholder outreach meeting. Currently, Liberty hosts a low-income stakeholder meeting annually. In the direct testimony of Nathaniel Hackney, p. 12, it proposes to continue this practice. This is good but insufficient.
2. The Collaborative should be for all Liberty programs directed at low- and moderate-income customers.
3. The Collaborative should meet quarterly rather than annually. This will facilitate better communication, timely reporting, and promote accountability.
4. The Collaborative should have leadership selected from among the stakeholders by the stakeholders to work in partnership with company representatives. While Fresh Start and other programs geared toward low- and moderate-income customers must be run in accordance with the agreements in this rate case, shared leadership around facilitation, agenda setting, and other operational matters will allow for more significant and meaningful engagement from stakeholders.

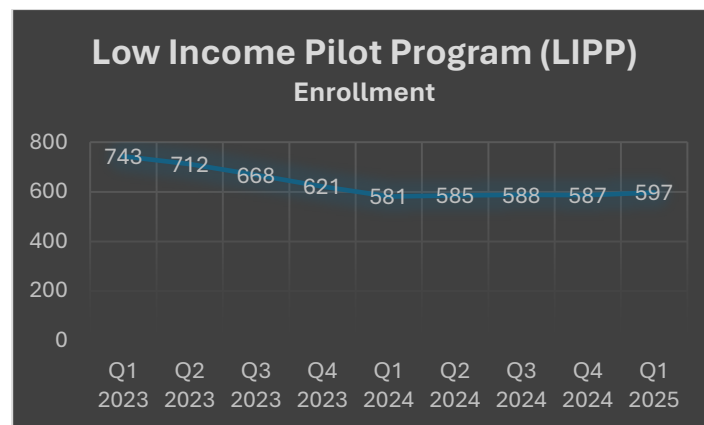
Low Income Pilot Program (LIPP), transition to Fresh Start

I make these recommendations.

1. I support the transition of LIPP to the Fresh Start program, as outlined in the direct testimony of Nathaniel Hackney, pp. 16-20.

- 1 2. Funding for Fresh Start should be set at \$900,000, rather than \$500,000 as
2 currently budgeted for LIPP, with corresponding enrollment targets.
- 3 3. The \$900,000 should be split 50/50 between shareholders and rate
4 payers.
- 5 4. The enrollment target should be much higher than Liberty's proposed
6 target of 374. I recommend retaining the program cap of 2000, with
7 annual/quarterly targets to be established in coordination with the
8 Collaborative outlined above.

9 Enrollment in LIPP has declined and stagnated (Q1 2023 = 743; Q1
10 2024 = 581; Q1 2025 = 597; overall a 20% decline). It has certainly never
11 come close to the program cap of 2000 participants.



12 Liberty proposes smaller enrollments (and thus, smaller funding) with
13 larger rewards, targeting 374 enrollments to match its funding
14 recommendation of \$300,000. The target of 374 is too low given the
15 number of people eligible for the program. Using various methods of
16 calculation (e.g. increased target in parity with increased funding; past
17

1 peak performance as baseline, etc.), I would recommend a target
2 somewhere between 1250 and 1600 to start.

3 It must be highlighted that this is the only company funded program
4 that actually includes any arrearage forgiveness. I've already
5 demonstrated the financial challenges low- and moderate-income
6 people are likely to face in the future. This is not a time to actually reduce
7 commitments to assist customers restore and maintain their financial
8 well-being.

- 9 5. The company should track retention based on participation or non-
10 participation in budget billing, as the company suggests. Liberty is
11 modeling Fresh Start on Ameren's Keeping Current program and has
12 raised a valid concern. Ameren, too, has found confusion among
13 enrollees about budget billing and annual adjustments in the budget
14 billing amount in their Keeping Current program. I know this also from
15 personal knowledge of the program at my own agency. This opportunity
16 will produce important data to evaluate operations.
- 17 6. A clear and systematic process should be developed for establishing
18 need, annual budgeting, annual targets of customers served, and annual
19 achievement of targets, and all such information be reportable to
20 stakeholders and partner agencies. Systematic planning and tracking of
21 targets would provide a better opportunity for improved success, with

1 specified targets and outcomes accountable to affected communities
2 and stakeholders.

- 3 7. The development and maintenance of this process must include input
4 from stakeholders and partner agencies in a formal collaborative process.

5 Regular reporting would occur at the quarterly Collaborative meetings.

- 6 8. The third-party audit suggested by Liberty should be budgeted at \$40,000
7 and must include customer and stakeholder interviews.

8 The company is to be commended for suggesting the audit. However,
9 its budget of \$25,000 is too small. The budget must incorporate customer
10 and stakeholder interviews, which will increase costs. A larger budget is
11 required for a comprehensive audit.

- 12 9. The Collaborative members must be directly involved in selecting the
13 third-party program auditor.

14 **Critical Medical Needs Program**

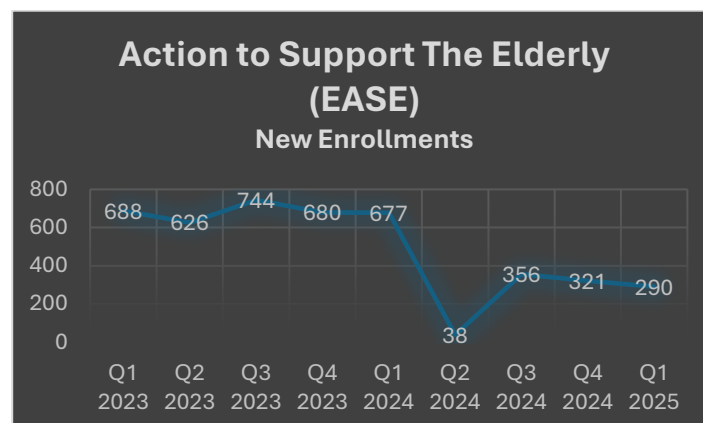
- 15 1. Like the Fresh Start program, Liberty should create a clear and
16 systematic process of establishing need, annual budgeting, annual
17 targets of customers served, and annual achievement of targets, all
18 reportable to stakeholders and partner agencies. The program has had
19 success so far in enrolling customers, but my recommendation would
20 provide a better opportunity for improved success with targets and
21 outcomes accountable to affected communities and stakeholders.

1 The CMNP program began midway through 2023, so 2024 is the only
2 year with full reporting of enrollment, which stood at 56. This feels
3 underutilized to me. In fairness to Liberty, similar programs at other
4 companies feel underutilized to me, too. These are new programs gaining
5 their footing. The planning and reporting process I recommend here
6 should help clarify how to evaluate success.

7 **Action to Support the Elderly (EASE)**

- 8 1. Again, Liberty should create a clear and systematic process of
9 establishing need, annual budgeting, annual targets of customers
10 served, and annual achievement of targets, all reportable to stakeholders
11 and partner agencies.

12 As is the case with most of the programs I'm examining, enrollment
13 has declined and/or stagnated. This is a worthwhile program, and the
14 benefits are meaningful to participants.



Project Help

1. Project Help should expand the scope of crisis situations it covers to include all households in crisis.

As a program entirely supported by donations, Project Help may not fall under the jurisdiction of this Commission. Still, I must address it.

It is the only assistance program unequivocally targeted to help those in crisis. Yet it is restricted to seniors and the disabled. Its reported assistance is accordingly quite small. It assisted 27 households in 2023 and 29 in 2024. This is a program that needs both to grow resources and to expand its parameters.

Liberty, in response to a query from Consumers Council, reported donations to the program for 2023, 2024, and Q1 2025. Once again, even in that short reporting period, we see a sharp falloff, from \$57,103 in 2023, to \$19,024 in 2024.

These figures are useful in demonstrating the trajectory of fundraising, but incomplete in showing the capacity, that is, the total financial resources available to the program, which has existed since 1987.

This program appears to be neglected, which is unfortunate. In a world where true crisis assistance is limited and likely to become ever scarcer, donor driven programs like Project Help are essential.

2. Liberty should create a clear and systematic process of establishing need, annual budgeting, annual targets of customers served, and annual

1 achievement of targets, all reportable to stakeholders and partner
2 agencies.

3 **Community Outreach for Utility Bill Assistance Programs**

- 4 1. Liberty should target specific resources and programs to educate
5 customers about the availability and services of their low-income
6 customer assistance programs. This marketing should focus on high
7 energy burden communities. However, this should not be a substitute
8 for, or instead of, more general promotion of the programs to all
9 customers.
- 10 2. Liberty should recommit to and increase promotion of its Project Help
11 program, in light of reduced funding for governmental assistance
12 programs helping those in crisis.

13 **Q. Does this conclude your testimony?**

14 A. Yes, it does.

1 **BEFORE THE PUBLIC SERVICE COMMISSION**
2 **OF THE STATE OF MISSOURI**
3
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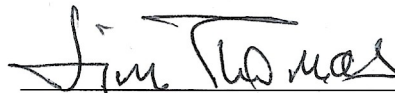
5 In the Matter of the Request of The Empire)
6 District Electric Company d/b/a Liberty for)
7 Authority to File Tariffs Increasing Rates for)
8 Electric Service Provided to Customers in Its)
9 Missouri Service Area)

File No. ER-2024-0261

10 **AFFIDAVIT OF JIM THOMAS**
11

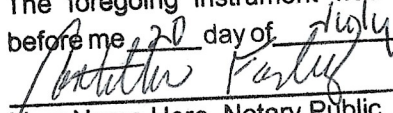
12 I, the undersigned, being duly sworn, states that my name is Jim Thomas, and that the
13 foregoing Direct Testimony of Jim Thomas, including attachments, was prepared by me on
14 behalf of the Consumers Council of Missouri. This testimony was prepared in written form
15 for the purpose of its introduction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

17 I hereby swear and affirm that the attached testimony is true and correct to my best
18 knowledge, information, and belief, and I adopt said testimony as if it were given under oath
19 in a formal hearing.
20
21
22

23 
24

25 Jim Thomas
26
27

28 Subscribed before me on this 20 day of July, 2025:
29

State of: Missouri
County of: St. Louis City
The foregoing instrument was acknowledged
before me 20 day of July, 2025

Your Name Here, Notary Public
My Commission Expires Sept 18, 2026

CONELLA FARLEY
Notary Public - Notary Seal
STATE OF MISSOURI
St. Louis City
My Commission Expires: Sep. 18, 2026
Commission # 22692025