



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

File No. OW-2026-0085

Content: Response to Order Requesting
Comments and Scheduling Workshop

Date of Submission: 04/23/2026

Name of Agency: Community Services, Inc. of Northwest Missouri

Mission Statement of agency: To empower the people of Northwest Missouri to achieve their goals and to improve their quality of life.

Organization: Community Services, Inc.
Name: Bonnie Patterson
Title: Executive Director
Date of Submission: 04/23/2026
Provider? <input checked="" type="checkbox"/> Please complete both Part A and Part B
Stakeholder only? <input type="checkbox"/> Please complete only Part B
Programs Administered/Managed by your Organization (ALL utility related programs, including government funded programs such as LIHEAP and weatherization)
<ol style="list-style-type: none"> 1. Weatherization 2. Ameren Electric/Weatherization 3. Liberty Gas/Weatherization 4. Spire Energy/Weatherization 5. Evergy/Weatherization STIP 6. Evergy/Weatherization GMOPS 7. LIHEAP 8. ERPP

Part A: Provider Information Request

If you or your organization helps or has previously helped administer a utility assistance program (**weatherization, LIHEAP, PAYS, Keeping Current, Dollar Help, Dollar More, ERPP, Critical Needs, Low-Income Assistance Programs, Payment Partner Program, etc.**) please provide your name and the name of your organization and complete Part A. **If you don't manage or administer programs, skip to Part B on page 2.**

Please complete a table for each program that your organization manages

Copy and paste the tables as needed for the number of programs your organization manages

Cells will expand as needed to accommodate text

Provide information on the time and duration of administering program (for example: Weatherization – February 1976)

Provider Question 1: PROGRAM ADMINISTRATION					
Utility Company		Program Name		State Agency Partner	
		Weatherization		DNR	
Program Start Date	1976	Program End Date		Total # Employ	7
Job Title 1	Program Director	Duties	Oversee all aspects of the Weatherization program	# Employ	1
Job Title 2	Office Assistant	Duties	Inputs data into state MoWAP system, program eligibility	# Employ	1
Job Title 3	BPI Auditor/QCI Inspector	Duties	Assess homes for needed measures, inspects work completed by crew members	# Employ	2
Job Title 4	Crew Member	Duties	Perform work on the homes for the program	# Employ	3
Annual Average Enrollment #	100	Monthly Average Enrollment #	5 - 8		
Comments					

Provider Question 2: EVALUATION FOR EFFECTIVENESS	
Do you conduct surveys to gauge effectiveness of this utility assistance program?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
Do you conduct any non-survey evaluations to gauge effectiveness of this program?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
Do you share the results...with utility partners? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> ...with state agencies?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
If you conduct surveys or other evaluations, please explain the process you use.	

Provider Question 3: STRENGTHS AND WEAKNESSES OF ASSISTANCE PROGRAMS
Based on experience and participant feedback, what are the STRENGTHS of this program?
The Weatherization program assess homes for air infiltration and health and safety issues. This makes our client's home safer for them to live there as well as stops air infiltrating the home and makes it more energy efficient. This lowers their energy costs.
Based on experience and participant feedback, what are the WEAKNESSES of this program?
There are no weaknesses that our agency has incurred.
If you have it, please provide empirical and/or anecdotal data that support your comments.

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Provider Question 1: PROGRAM ADMINISTRATION					
Utility Company		Program Name		State Agency Partner	
Ameren Electric		Weatherization			
Program Start Date	2008	Program End Date		Total # Employ	
Job Title 1		Duties		# Employ	
Job Title 2		Duties		# Employ	
Job Title 3		Duties		# Employ	
Annual Average Enrollment #	3	Monthly Average Enrollment #	1		
Comments					

Provider Question 2: EVALUATION FOR EFFECTIVENESS	
Do you conduct surveys to gauge effectiveness of this utility assistance program?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
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This program enhances our regular weatherization funds to be able to address more issues with the homes of our clients. We are able to update old and nonfunctioning heating and cooling systems which helps with energy consumption and lowers costly utility bills.
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Provider Question 1: PROGRAM ADMINISTRATION					
Utility Company		Program Name		State Agency Partner	
Liberty Gas		Weatherization		DNR	
Program Start Date	2006	Program End Date		Total # Employ	
Job Title 1		Duties		# Employ	
Job Title 2		Duties		# Employ	
Job Title 3		Duties		# Employ	
Annual Average Enrollment #	4	Monthly Average Enrollment #	1		
Comments					

Provider Question 2: EVALUATION FOR EFFECTIVENESS	
Do you conduct surveys to gauge effectiveness of this utility assistance program?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
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Provider Question 1: PROGRAM ADMINISTRATION					
Utility Company		Program Name		State Agency Partner	
Spire Energy		Weatherization			
Program Start Date	2009	Program End Date		Total # Employ	
Job Title 1		Duties		# Employ	
Job Title 2		Duties		# Employ	
Job Title 3		Duties		# Employ	
Annual Average Enrollment #	18	Monthly Average Enrollment #	1 -2		
Comments					

Provider Question 2: EVALUATION FOR EFFECTIVENESS	
Do you conduct surveys to gauge effectiveness of this utility assistance program?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
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Provider Question 1: PROGRAM ADMINISTRATION					
Utility Company		Program Name		State Agency Partner	
Evergny		Weatherization STIP			
Program Start Date	2017	Program End Date		Total # Employ	2
Job Title 1	Crew Member	Duties	Weatherization measures on homes	# Employ	2
Job Title 2		Duties		# Employ	
Job Title 3		Duties		# Employ	
Annual Average Enrollment #	6	Monthly Average Enrollment #		1	
Comments					

Provider Question 2: EVALUATION FOR EFFECTIVENESS	
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Provider Question 1: PROGRAM ADMINISTRATION					
Utility Company		Program Name		State Agency Partner	
Energy		Weatherization GMOPS			
Program Start Date	1997	Program End Date		Total # Employ	1
Job Title 1	Crew Member	Duties	Weatherization measures on homes	# Employ	1
Job Title 2		Duties		# Employ	
Job Title 3		Duties		# Employ	
Annual Average Enrollment #	30	Monthly Average Enrollment #	3 - 5		
Comments					

Provider Question 2: EVALUATION FOR EFFECTIVENESS	
Do you conduct surveys to gauge effectiveness of this utility assistance program?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
Do you conduct any non-survey evaluations to gauge effectiveness of this program?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
Do you share the results...with utility partners? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> ...with state agencies? <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	
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Provider Question 1: PROGRAM ADMINISTRATION					
Utility Company		Program Name		State Agency Partner	
		LIHEAP		DSS	
Program Start Date	1981	Program End Date		Total # Employ	4
Job Title 1	LIHEAP Supervisor	Duties	Oversee program	# Employ	1
Job Title 2	LIHEAP Manager	Duties	Processor	# Employ	1
Job Title 3	Special Projects	Duties	Confidential Processor/Processor	# Employ	1
Job Title 4	County Director	Duties	Intake of applications	# Employ	1
Annual Average Enrollment #	883	Monthly Average Enrollment #	70-75		
Comments					

Provider Question 2: EVALUATION FOR EFFECTIVENESS	
Do you conduct surveys to gauge effectiveness of this utility assistance program?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
Do you conduct any non-survey evaluations to gauge effectiveness of this program?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
Do you share the results...with utility partners? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> ...with state agencies? <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	
If you conduct surveys or other evaluations, please explain the process you use.	

Provider Question 3: STRENGTHS AND WEAKNESSES OF ASSISTANCE PROGRAMS	
Based on experience and participant feedback, what are the STRENGTHS of this program?	
The strengths of this program: Alleviate utility disconnect, Clients can remain in homes, and by using these funds it leaves room for them to be able to pay for medications, rent, and other basic needs.	
Based on experience and participant feedback, what are the WEAKNESSES of this program?	
Underfunded. Does not keep up with the rising energy costs. The amount allowed for summer bills isn't enough to cover much.	
If you have it, please provide empirical and/or anecdotal data that support your comments.	

Part A: Provider Information Request

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Provider Question 1: PROGRAM ADMINISTRATION					
Utility Company		Program Name		State Agency Partner	
Energy		Economic Relief Pilot Program (ERPP)			
Program Start Date	2007	Program End Date		Total # Employ	
Job Title 1		Duties		# Employ	
Job Title 2		Duties		# Employ	
Job Title 3		Duties		# Employ	
Annual Average Enrollment #	85	Monthly Average Enrollment #	7		
Comments					

Provider Question 2: EVALUATION FOR EFFECTIVENESS	
Do you conduct surveys to gauge effectiveness of this utility assistance program?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
Do you conduct any non-survey evaluations to gauge effectiveness of this program?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
Do you share the results...with utility partners? Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> ...with state agencies? <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	
If you conduct surveys or other evaluations, please explain the process you use.	
During conversations with clients, they let us know that the program helps them to be able to manage their utility bills, stay in their homes, and to take care of other basic needs.	

Provider Question 3: STRENGTHS AND WEAKNESSES OF ASSISTANCE PROGRAMS	
Based on experience and participant feedback, what are the STRENGTHS of this program?	
Ensures their bill is more manageable, and they are able to take care of basic needs and maintain their household.	
Based on experience and participant feedback, what are the WEAKNESSES of this program?	
There are no weaknesses that our agency has incurred.	
If you have it, please provide empirical and/or anecdotal data that support your comments.	

Part B: Stakeholder Information Request

All interested stakeholders are invited to submit responses to **any or all of the following questions**. To ensure submissions are as helpful as possible, respondents are encouraged to provide specific information and data relevant to circumstances experienced in Missouri, "lessons learned" from other jurisdictions, and citations.

Stakeholder Question 1: EFFECTIVENESS OF EXISTING PROGRAMS AT REDUCING ARREARAGES AND DISCONNECTIONS FOR HIGH-BURDEN HOUSEHOLDS	
a. How much do existing programs help improve long-term household stability versus one-time crisis relief (i.e. reduce repeat disconnects)?	The programs that are operated ensures that homes are safer and more energy efficient; as well as allowing households to meet energy costs and other basic needs.
b. Which specific features are most effective at stabilizing households and preventing repeated cycles of arrearage (e.g., predictable monthly payments, income-based caps, arrearage forgiveness, and hardship protections, etc.)?	Arrearage forgiveness would be effective in allowing households to get out from under the bill that could be preventing them from obtaining a utility service.
c. What customer categories (e.g., irregular income, medical debt, unbanked, etc.) are currently underserved or excluded by existing programs?	Medical debt and payroll garnishments
d. What aspects of existing programs limit or reduce effectiveness (e.g., funding caps, restrictive eligibility windows, administrative barriers, etc.)?	
e. What specific modifications or alternative models (e.g., income-based caps or automatic enrollment) could close identified gaps?	A 3-year certification for fixed incomes, would be a reduction on paperwork and stress on the applicant and processing agency.

Stakeholder Question 2: CRITERIA AND MECHANISMS FOR PROGRAM ENROLLMENT	
a. What principles should be used to establish eligibility criteria (e.g., need, administrative feasibility, accuracy, and alignment with household need) and how should programs prioritize access to assistance when resources are limited?	Income eligibility and crisis situation; prioritized by first come, first serve as funding allows.
b. What income thresholds, vulnerability indicators, or energy burden metrics to determine program eligibility?	
c. Would automatic or categorical enrollment be effective?	Automatic enrollment for SNAP recipients could be effective.
d. What risk-management practices (e.g., random audits, post-enrollment verification, data-matching) should be used that are effective without creating undue burdens for applicants?	Random audits and more than one person checking the file for accuracy and confirming eligibility.
e. What program design elements can be included that prevent fraud, collecting duplicate benefits, or mismanagement while maintaining accessibility for eligible households?	The software has features to prevent duplicate entries that occur by social security number and address to ensure workers verify data.

Stakeholder Question 3: CHALLENGES OF ADMINISTRATIVE BURDEN	
a. What administrative practices would reduce customer burden and streamline application, verification, and recertification processes (e.g., short-form applications, online portals, single-point-of-entry systems)?	Short form applications and single point of entry
b. What program design elements would reduce administrative workload while maintaining accurate eligibility determinations?	

Importing online applications to software

c. What strategies from other jurisdictions that have effectively reduced verification or recertification barriers?

SNAP eligible=LIHEAP eligible

Stakeholder Question 4: METRICS AND EVALUATION

a. What metrics should be used to evaluate program performance, measure impacts, and assess cost-effectiveness?

Monitoring by funding sources and agency audits

b. What metrics should be used to evaluate the effectiveness of marketing, education, and outreach efforts?

c. What customer-experience metrics should be used to evaluate program accessibility, clarity, and ease of navigation, including the application, verification, and enrollment processes?

Customer surveys

d. What metrics should be used to evaluate whether verification requirements are appropriately calibrated to risk?

e. What metrics should be used to assess whether programs improve long-term household stability, reduce arrearages, prevent disconnections, and support energy-efficiency or weatherization investments?

Tracking participation in programs and amount of time between repeated assistance.

Stakeholder Question 5: RATE STRUCTURES AND ASSISTANCE SUCCESS

a. Is there a relationship between utility rate structures and the success of assistance programs? If so, what is that relationship?

Yes, In order for the program to be successful, the amount of assistance needs to be correlated with the utility prices.

B31. How does the rate design element of **fixed charges** affect households with limited or no income flexibility?

May work for the short term, but if charges are higher than fixed charges, the balance continues to accumulate.

b2. How does the rate design element of **seasonal usage and rates** affect households with limited or no income flexibility?

b3. How does the rate design element of **time-variant pricing** affect households with limited or no income flexibility?

Negatively, not logical as the time-variant pricing is lowest, typically during inconvenient hours for consumers.

Stakeholder Question 6: EFFECTIVENESS AND REDUCING RELIANCE ON CRISIS ASSISTANCE

Identify specific program elements that have demonstrated the greatest success in reducing reliance on “in crisis” assistance. (e.g., offering 1/12th debt forgiveness in exchange for on-time payments, offering levelized billing)

A majority of our clientele are on fixed incomes so with rising utility costs levelized billing helps them continue to have housing stability.

Stakeholder Question 7: IMPLEMENTATION CHALLENGES

Describe the implementation challenges that should be anticipated when launching new assistance programs.

Training, staffing, funding, eligibility requirements, and multiple computer systems