

**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: 4/24/2026



Missouri Ozarks Community Action

Our Mission: To strengthen our communities and encourage self-reliance; we work in partnership with our communities by implementing programs and providing resources to improve lives and inspire hope for low-income individuals and families.

Organization: Missouri Ozarks Community Action
Name: Mary Mullins
Title: Community Services Director
Date of Submission: 4/23/2026
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. LIHEAP 2. Dollar More 3. Keeping Current

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	
		LIHEAP		Missouri Department of Social Services	
Program Start Date	1981	Program End Date	Present	Total # Employ	9
Job Title 1	County Projects Coordinator	Duties	Provide Energy assistance to families and assess what else the family needs to be self sufficient refers them to needed programs	# Employ	7
Job Title 2	LIHEAP Manager	Duties	Administrate Program	# Employ	1
Job Title 3	Energy Services Advocate	Duties	Process applications	# Employ	1
Job Title 4	Community Services Director	Duties	Oversight of Program		
Annual Average Enrollment #	6800	Monthly Average Enrollment #	567		
Comments					

Provider Question 2: EVALUATION FOR EFFECTIVENESS	
Do you conduct surveys to gauge effectiveness of this utility assistance program?	<input checked="" type="checkbox"/> Yes <input 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 type="checkbox"/> No <input checked="" type="checkbox"/> ...with state agencies? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	
If you conduct surveys or other evaluations, please explain the process you use.	
We collect Customer Satisfaction data it is not specific to program it has utility assistance as a choice.	

Provider Question 3: STRENGTHS AND WEAKNESSES OF ASSISTANCE PROGRAMS	
Based on experience and participant feedback, what are the STRENGTHS of this program?	
<p>LIHEAP is a vital safety-net program that helps low-income households maintain essential heating and cooling during extreme weather conditions. Participant feedback consistently indicates that LIHEAP assistance prevents utility disconnections, reduces energy-related stress, and supports the health and safety of seniors, individuals with disabilities, and families with young children.</p> <p>The program is particularly effective in crisis situations, allowing MOCA to intervene quickly for households facing imminent shutoff or fuel loss. LIHEAP’s availability across MOCA’s largely rural service area ensures access for households with limited alternative resources.</p>	
Based on experience and participant feedback, what are the WEAKNESSES of this program?	
<p>Demand for LIHEAP assistance regularly exceeds available funding. Limited program funding restricts benefit levels and contributes to processing delays during peak seasons, as high application volumes cannot always be matched with sufficient staffing and administrative capacity due to funding. Participants report that these delays can be stressful when utilities are at risk of disconnection.</p>	
If you have it, please provide empirical and/or anecdotal data that support your comments.	

Provider Question 1: PROGRAM ADMINISTRATION					
Utility Company		Program Name		State Agency Partner	
		Dollar More		Missouri Department of Social Services	
Program Start Date	1981	Program End Date	Present	Total # Employ	9
Job Title 1	County Projects Coordinator	Duties	Provide Energy assistance to families and assess what else the family needs to be self-sufficient refers them to needed programs	# Employ	7
Job Title 2	LIHEAP Manager	Duties	Administrate Program	# Employ	1
Job Title 3	Energy Services Advocate	Duties	Process applications	# Employ	1
Job Title 4	Community Services Director	Duties	Oversight of program	# Employ	1
Annual Average Enrollment #	100	Monthly Average Enrollment #	8		
Comments					

Provider Question 2: EVALUATION FOR EFFECTIVENESS	
Do you conduct surveys to gauge effectiveness of this utility assistance program?	<input checked="" type="checkbox"/> Yes <input 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 type="checkbox"/> No <input checked="" type="checkbox"/> ...with state agencies?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
If you conduct surveys or other evaluations, please explain the process you use.	
We collect Customer Satisfaction data it is not specific to program it has utility assistance as a choice.	

Provider Question 3: STRENGTHS AND WEAKNESSES OF ASSISTANCE PROGRAMS	
Based on experience and participant feedback, what are the STRENGTHS of this program?	
<p>Dollar More provides flexible, short-term assistance to households facing urgent utility needs that are not fully covered by other programs. Participant feedback indicates the program is effective in preventing utility disconnections, addressing remaining balances, and complementing LIHEAP</p>	

assistance. Its flexibility allows MOCA to respond quickly to individual household circumstances, strengthening overall service stabilization.

Based on experience and participant feedback, what are the **WEAKNESSES** of this program?

Funding for Dollar More is limited and dependent on voluntary contributions, resulting in fluctuating availability that does not consistently meet community demand. During high-need periods, limited funds can lead to delays or an inability to serve all eligible households. The program addresses immediate needs but does not resolve long-term utility affordability issues.

If you have it, please provide empirical and/or anecdotal data that support your comments.

Provider Question 1: PROGRAM ADMINISTRATION					
Utility Company		Program Name		State Agency Partner	
		Keeping Current		Missouri Department of Social Services	
Program Start Date	2010	Program End Date	Present	Total # Employ	9
Job Title 1	County Projects Coordinator	Duties	Provide Energy assistance to families and assess what else the family needs to be self-sufficient refers them to needed programs	# Employ	7
Job Title 2	LIHEAP Manager	Duties	Administrate Program	# Employ	1
Job Title 3	Energy Services Advocate	Duties	Process applications	# Employ	1
Job Title 4	Community Services Director	Duties	Program Oversight	# Employ	1
Annual Average Enrollment #	50	Monthly Average Enrollment #	4		
Comments					

Provider Question 2: EVALUATION FOR EFFECTIVENESS	
Do you conduct surveys to gauge effectiveness of this utility assistance program?	<input checked="" type="checkbox"/> Yes <input 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 type="checkbox"/> No <input checked="" type="checkbox"/> ...with state agencies?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
If you conduct surveys or other evaluations, please explain the process you use.	
We collect Customer Satisfaction data it is not specific to program it has utility assistance as a choice.	

Provider Question 3: STRENGTHS AND WEAKNESSES OF ASSISTANCE PROGRAMS

Based on experience and participant feedback, what are the STRENGTHS of this program?
The Keeping Current Program helps income-eligible households maintain on-time utility payments by placing accounts on affordable monthly payment arrangements and forgiving past-due balances when payments are made as agreed. Participant feedback indicates the program is effective in preventing disconnections and promoting long-term account stability.
Based on experience and participant feedback, what are the WEAKNESSES of this program?
Participation requires consistent monthly payments, which can be challenging for households with unstable or fixed incomes. Limited funding and capacity also restrict enrollment, and the program may not fully offset rising utility costs for households with ongoing financial hardship.
If you have it, please provide empirical and/or anecdotal data that support your comments.

Provider Question 1: PROGRAM ADMINISTRATION					
Utility Company		Program Name		State Agency Partner	
		Weatherization		Missouri Department of Social Services	
Program Start Date	2010	Program End Date	Present	Total # Employ	10
Job Title 1	Weatherization Housing Director	Duties		# Employ	1
Job Title 2	Weatherization Coordinator	Duties		# Employ	2
Job Title 3	Weatherization Final Inspector	Duties		# Employ	1
Job Title 4	Weatherization Auditor	Duties		# Employ	1
Job Title 5	Weatherization Auditor Quality Control inspector	Duties		# Employ	1
Job Title 6	Weatherization Crew Supervisor	Duties		# Employ	1
Job Title 7	Weatherization Tech	Duties		# Employ	3
Annual Average Enrollment #				Monthly Average Enrollment #	
Comments					

Provider Question 2: EVALUATION FOR EFFECTIVENESS	
Do you conduct surveys to gauge effectiveness of this utility assistance program?	<input checked="" type="checkbox"/> Yes <input 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 type="checkbox"/> No <input checked="" type="checkbox"/> ...with state agencies?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
If you conduct surveys or other evaluations, please explain the process you use.	
We collect Customer Satisfaction data it is not specific to program it has utility assistance as a choice.	

Provider Question 3: STRENGTHS AND WEAKNESSES OF ASSISTANCE PROGRAMS
Based on experience and participant feedback, what are the STRENGTHS of this program?
Based on experience and participant feedback, what are the WEAKNESSES of this program?
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)?	One time does not help long time help. Ongoing help seems to help for long term.
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.)?	Predictable monthly payments would help.
c. What customer categories (e.g., irregular income, medical debt, unbanked, etc.) are currently underserved or excluded by existing programs?	<p>Renters with Utilities Included in Rent or Split Billing Arrangements</p> <p>Some renters cannot access assistance because utilities are not billed directly in their name or are bundled with rent, limiting eligibility under standard program rules. Households with Limited Documentation Access Rural geography, limited broadband access, and documentation requirements can delay or prevent enrollment, especially for seniors and individuals with disabilities.</p> <p>Poverty Levels hurt people just above the threshold.</p>
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?	Not having enough Administration funding.
	Automatic enrollment for people with fixed income such as seniors and people on permanent disability.

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?	Prioritize by disconnect date. If they have a medical statement with life threatening medical condition they should go to the top. Seniors should be prioritized.
b. What income thresholds, vulnerability indicators, or energy burden metrics to determine program eligibility?	No suggestion
c. Would automatic or categorical enrollment be effective?	Yes for people that are on fixed income.
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?	No suggestions
e. What program design elements can be included that prevent fraud, collecting duplicate benefits, or mismanagement while maintaining accessibility for eligible households?	No suggestions

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)?	Single point entry systems. LIHEAP should share their data with other agency programs.
b. What program design elements would reduce administrative workload while maintaining accurate eligibility determinations?	No Suggestions
c. What strategies from other jurisdictions that have effectively reduced verification or recertification barriers?	No Suggestions

Stakeholder Question 4: METRICS AND EVALUATION	
a. What metrics should be used to evaluate program performance, measure impacts, and assess cost-effectiveness?	ROMA
b. What metrics should be used to evaluate the effectiveness of marketing, education, and outreach efforts?	ROMA
c. What customer-experience metrics should be used to evaluate program accessibility, clarity, and ease of navigation, including the application, verification, and enrollment processes?	ROMA
d. What metrics should be used to evaluate whether verification requirements are appropriately calibrated to risk?	ROMA
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?	

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?	When utility rates are predictable, affordable, and aligned with income, assistance programs are more successful in helping households remain current and avoid disconnection. Programs such as LIHEAP or Ameren’s Keeping Current work best when monthly bills are stable enough that assistance payments and customer contributions can realistically cover ongoing charges.
B31. How does the rate design element of fixed charges affect households with limited or no income flexibility?	Fixed charges disproportionately burden households with little or no income flexibility because they must be paid every month regardless of energy use or the household’s ability to reduce consumption.
b2. How does the rate design element of seasonal usage and rates affect households with limited or no income flexibility?	They get disconnected.
b3. How does the rate design element of time-variant pricing affect households with limited or no income flexibility?	Many low-income households, seniors, and individuals with disabilities lack the ability to adjust usage due to fixed work schedules, caregiving responsibilities, medical equipment needs, or limited access to energy-efficient appliances.

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)

With Keeping Current be able to use EA to make a payment.

Stakeholder Question 7: IMPLEMENTATION CHALLENGES

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

Training enough and new staff.