

**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: 04.24.2026



Empowering People, Enriching Communities

Ozarks Area Community Action Agency

Mission: To create lasting solutions to poverty for families and communities in Southwest Missouri

Vision: OACAC envisions people living an optimal, empowered life, free from poverty.

Organization: Ozarks Area Community Action Corporation
Name: Jennifer Olson
Title: Executive Director
Date of Submission: 04.24.2026
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. Weatherization 3. Project Share 4. Social Responsibility Funds-Liberty

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	
Liberty, Spire		Weatherization		DNR/DE	
Program Start Date	1974	Program End Date	-	Total # Employ	22
Job Title 1	Weatherization Director	Duties	Responsibility for the overall leadership, management, and coordination of the project(s), and provide staff with updated information and technological changes. Supervision of weatherization employees. Prepares and monitors budget(s), reviews production each month. Spokesperson for the weatherization department to the media and public. Contact person for client's complaints when problem cannot be resolved by the contact person	# Employ	1
Job Title 2	Data Processor	Duties	Data entry, record keeping, inventory, preparation of the monthly and quarterly report(s) to the program funding sources, determining cost breakdown per job and funding source. Running of the NEAT and MEHA audits.	# Employ	2
Job Title 3	Crew Supervisor/Quality Control Inspector	Duties	Knowledge of the Weatherization program and the SWS, the Missouri work standards and technical requirements. This position is responsible for final inspections of client's home, to ensure all program requirements are correctly followed and all material was installed properly.	# Employ	1

			Crew Supervisor will also supervise all Crew Chiefs and Retrofit Installer Technician		
Job Title 4	Crew Chief	Duties	Knowledge of the Weatherization Program, the work standards and technical requirements. Must have the ability to oversee a crew member(s) on the job site and be able to work well the auditors, final inspector, director, office staff, and sub-contractors. Must be able to understand and follow work orders as well as keep an inventory of all materials and tools. Must have the ability to install and repair infiltration materials such as doors, windows, insulation and general air sealing measures. Must be able to operate power tools and any other equipment associated with this position.	# Employ	4
Job Title 5	Vent Combust Tech	Duties	Will install all ASHRAE 62.2 compliant exhaust fans along with some HVAC work.	# Employ	1
Job Title 6	Contract/Support Specialist	Duties	Will perform such duties as maintaining client files, verifying client income and other required documentation, contracts, vehicle records, safety meetings, schedule finals for final inspectors, and make reports to the Neighborhood centers. Contracts for contractors, furnace Bids, contractor insurance information, maintain petty cash records, make bank deposits. Incoming / outgoing calls for clients and staff.	# Employ	1

Job Title 7	Energy Auditor	Duties	Knowledge of the Weatherization program and the SWS, the Missouri work standards and technical requirements. This position is responsible for initial inspections of client's home, to evaluate the home for potential energy efficiency improvements and any potential health and safety problems related to Weatherization.	# Employ	3
Job Title 8	Retrofit Installer Tech	Duties	Knowledge of the weatherization program, the work standards and technical requirements. Have the ability to work well with Crew Chief, auditors, final inspector, director, office staff and the public. Must be able to follow work orders, ability to install and repair infiltration materials such as doors, windows, insulation and general air sealing measures. Must be able to operate power tools and any equipment associated with this position.	# Employ	8
Job Title 9	Office Assistant	Duties	The Weatherization Office Assistant(s) will perform such duties as data entry, answering phones, filling, and assist in processing weatherization applications, entering NEAT/MHEA data, entering information into MoWAP, experience with Microsoft Word, Excel and ability to use a calculator.	# Employ	1

Annual Average Enrollment #	120 homes final	Monthly Average Enrollment #	10 homes final	
Comments	This will vary from year to year and month to month.			

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.	
Customer Satisfaction surveys are given in March and September of each year to all customers in any of OACAC's seven programs. The survey process is not specific to this utility program. These results are communicated to OACAC's Board of Directors and used in the Community Needs Assessment and Strategic Planning processes for the agency.	

Provider Question 3: STRENGTHS AND WEAKNESSES OF ASSISTANCE PROGRAMS	
Based on experience and participant feedback, what are the STRENGTHS of this program?	
<p>Weatherization is an income-based assistance program that allows families and individuals to live in healthier, more energy-efficient homes. There are very few other programs that provide improvements in our low-income neighbors living conditions like Weatherization does.</p> <p>The program is able to assist both tenants and homeowners and provides lasting value to those that receive the service.</p> <p>In addition, the program is supported by a Network throughout the state where best practices are shared so that services are rooted in excellence for those served. This Network supports Weatherization staff throughout the state in maintaining programmatic efficiencies, while also staying mission-focused.</p>	
Based on experience and participant feedback, what are the WEAKNESSES of this program?	
<p>It is difficult to attract and retain hourly-employee talent. While Weatherization programs are in the sphere of construction, program funding does not allow for comparable wages, which directly impacts the number of applicants and the retention of employees.</p> <p>Many applicants have additional repairs that need to be made prior to Weatherization services being implemented. There are very few funds for these sorts of repairs.</p>	

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

OACAC's most recent Community Needs Assessment, based on local qualitative and quantitative data, identified safe and sanitary housing as a key priority for SWMO. Many respondents noted the need for repairs and substandard living conditions in their rental homes. OACAC is currently in the middle of conducting another Community Needs Assessment and even though the data has not yet been analyzed, there has been a prevalence of comments about "slumlords" with unsafe rental conditions.

Provider Question 1: PROGRAM ADMINISTRATION

Utility Company		Program Name		State Agency Partner	
Liberty		Social Responsibility Funds			
Program Start Date		Program End Date		Total # Employ	22
Job Title 1	Weatherization Director	Duties	Responsibility for the overall leadership, management, and coordination of the project(s), and provide staff with updated information and technological changes. Supervision of weatherization employees. Prepares and monitors budget(s), reviews production each month. Spokesperson for the weatherization department to the media and public. Contact person for client's complaints when problem cannot be resolved by the contact person	# Employ	1
Job Title 2	Data Processor	Duties	Data entry, record keeping, inventory, preparation of the monthly and quarterly report(s) to the program funding sources, determining cost breakdown per job and funding source. Running of the NEAT and MEHA audits.	# Employ	2

Job Title 3	Crew Supervisor/Quality Control Inspector	Duties	<p>Knowledge of the Weatherization program and the SWS, the Missouri work standards and technical requirements. This position is responsible for final inspections of client's home, to ensure all program requirements are correctly followed and all material was installed properly.</p> <p>Crew Supervisor will also supervise all Crew Chiefs and Retrofit Installer Technician</p>	# Employ	1
Job Title 4	Crew Chief	Duties	<p>Knowledge of the Weatherization Program, the work standards and technical requirements. Must have the ability to oversee a crew member(s) on the job site and be able to work well the auditors, final inspector, director, office staff, and sub-contractors. Must be able to understand and follow work orders as well as keep an inventory of all materials and tools. Must have the ability to install and repair infiltration materials such as doors, windows, insulation and general air sealing measures. Must be able to operate power tools and any other equipment associated with this position.</p>	# Employ	4
Job Title 5	Vent Combust Tech	Duties	<p>Will install all ASHRAE 62.2 compliant exhaust fans along with some HVAC work.</p>	# Employ	1
Job Title 6	Contract/Support Specialist	Duties	<p>Will perform such duties as maintaining client files, verifying client income and other required documentation, contracts, vehicle records, safety meetings, schedule finals for final</p>	# Employ	1

			<p>inspectors, and make reports to the Neighborhood centers. Contracts for contractors, furnace</p> <p>Bids, contractor insurance information, maintain petty cash records, make bank deposits. Incoming / outgoing calls for clients and staff.</p>		
Job Title 7	Energy Auditor	Duties	<p>Knowledge of the Weatherization program and the SWS, the Missouri work standards and technical requirements. This position is responsible for initial inspections of client's home, to evaluate the home for potential energy efficiency improvements and any potential health and safety problems related to Weatherization.</p>	# Employ	3
Job Title 8	Retrofit Installer Tech	Duties	<p>Knowledge of the weatherization program, the work standards and technical requirements. Have the ability to work well with Crew Chief, auditors, final inspector, director, office staff and the public. Must be able to follow work orders, ability to install and repair infiltration materials such as doors, windows, insulation and general air sealing measures. Must be able to operate power tools and any equipment associated with this position.</p>	# Employ	8
Job Title 9	Office Assistant	Duties	<p>The Weatherization Office Assistant(s) will perform such duties as data entry, answering phones, filling, and assist in processing</p>	# Employ	1

			weatherization applications, entering NEAT/MHEA data, entering information into MoWAP, experience with Microsoft Word, Excel and ability to use a calculator.		
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 type="checkbox"/> Yes <input 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? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>	
If you conduct surveys or other evaluations, please explain the process you use. At the final we have the applicant fill out a Final Inspection Evaluation which ask if they are or are not satisfied with the Wx work and if their home needs anything else not covered by Wx.	
Customer Satisfaction surveys are given in March and September of each year to all customers in any of OACAC's seven programs. The survey process is not specific to this utility program. These results are communicated to OACAC's Board of Directors and used in the Community Needs Assessment and Strategic Planning processes for the agency.	

Provider Question 3: STRENGTHS AND WEAKNESSES OF ASSISTANCE PROGRAMS
Based on experience and participant feedback, what are the STRENGTHS of this program?
This program allows Weatherization staff to complete needed home repairs for low-income neighbors. These funds help Weatherization staff to complete repairs that would be ineligible to do under Weatherization funding.
Based on experience and participant feedback, what are the WEAKNESSES of this program?
The funds are limited and cannot be counted on to be sustainable. Even so, the need for this type of assistance still exists with very limited resources in SWMO to address the need.

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

OACAC's most recent Community Needs Assessment, based on local qualitative and quantitative data, identified safe and sanitary housing as a key priority for SWMO. Many respondents noted the need for repairs and substandard living conditions in their rental homes. OACAC is currently in the middle of conducting another Community Needs Assessment and even though the data has not yet been analyzed, there has been a prevalence of comments about "slumlords" with unsafe rental conditions.

Provider Question 1: PROGRAM ADMINISTRATION

Utility Company		Program Name		State Agency Partner	
Liberty, Spire		LIHEAP		DSS	
Program Start Date	1977	Program End Date	-	Total # Employ	9
Job Title 1	LIHEAP Director	Duties	Directs the LIHEAP program; Supervises LIHEAP staff; Accountable for LIHEAP regulations adherence; Maintains LIHEAP budget; Assures adherence to LIHEAP contract with DSS	# Employ	1
Job Title 2	LIHEAP Data Entry Clerk	Duties	Enters customer information into data base and facilitates energy assistance payments for income qualifying applicants	# Employ	2
Job Title 3	Administrative Assistant	Duties	Oversees agency MIS usage; Enters customer information into data base and facilitates energy assistance payments for income qualifying applicants	# Employ	1
Job Title 4	Office Assistant 2	Duties	Files customer paperwork; processes mail in applications; completes clerical duties as assigned; answers customer inquiries	# Employ	1
Job Title 5	Energy Assistance Support	Duties	Oversees training of new employees; provides support to LIHEAP Director; Enters customer information into data base and facilitates energy assistance payment for income qualifying applicants	# Employ	1
Job Title 7	Office Assistant 1	Duties	Files customer paperwork; processes mail in applications; answers customer inquires	# Employ	2
Annual Average Enrollment #		22,000		Monthly Average Enrollment #	
				1,833	

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.	
Customer Satisfaction surveys are given in March and September of each year to all customers in any of OACAC's seven programs. The survey process is not specific to this utility program. These results are communicated to OACAC's Board of Directors and used in the Community Needs Assessment and Strategic Planning processes for the agency.	

Provider Question 3: STRENGTHS AND WEAKNESSES OF ASSISTANCE PROGRAMS	
Based on experience and participant feedback, what are the STRENGTHS of this program?	
This program has clear and easy guidelines for assistance. It is an easy application process and an appointment does not need to be made. Customers can apply online or in person, whichever they prefer. It provides direct payment to the utility company to be efficient for the customer.	
Based on experience and participant feedback, what are the WEAKNESSES of this program?	
There is not enough funding to truly alleviate every crisis for every customer. In an era of rising fuel costs, the assistance caps cannot meet the needs of our low-income neighbors. And while the assistance helps, it still leaves many vulnerable in regards to their utilities.	
In addition, the amount of admin funds do not allow agencies to provide the level of customer service needed. Families and individuals that are applying are scared and often want to know the status of their application. And, while we do offer a call in line to check their status, they often want to speak with a live person. There are not enough staff or admin funds to give them the information they need, when they want it.	
If you have it, please provide empirical and/or anecdotal data that support your comments.	
As fuel costs increase, we continue to hear from our neighbors about their struggles to pay for utilities. As an agency, we are also noticing how these increases impact our programmatic budget and are requiring us to make budgetary decisions.	

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)?	Current direct utility assistance programs cannot provide long-term household stability for the majority of applicants. The programs do their best to alleviate crisis. However, with increasing fuel costs, these capped payments do not make as large of an impact as they used to. Combined with increasing housing and food costs, many families served by our agency are making choices about what bills they should pay.
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 are helpful, as long as there some sort of mechanism that gives grace if a payment is missed and there is no balloon amount due at the end of the year. Income-based caps could be helpful if the application process is clear and not overly cumbersome. Applicants often have questions about application processes and there would need to be a measure of customer service built into an income-based cap program. Arrearage forgiveness is likely the most helpful based on conversations with our customers.
c. What customer categories (e.g., irregular income, medical debt, unbanked, etc.) are currently underserved or excluded by existing programs?	Current programs that are funded through Federal means cannot serve noncitizens. In addition, the income limitations currently in place often exclude the working poor that make just too much for agency programming, yet not enough to be free of a utility burden.
d. What aspects of existing programs limit or reduce effectiveness (e.g., funding caps, restrictive eligibility windows, administrative barriers, etc.)?	Funding caps are likely the biggest barrier to program effectiveness
e. What specific modifications or alternative models (e.g., income-based caps or automatic enrollment) could close identified gaps?	Automatic enrollment processes would certainly increase the scope of our neighbors served.

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?

Prioritization should be based on income with consideration for household utility burden. Income-based prioritization would provide consideration for those on SSI, SSDI, TANF, etc. In addition, if funds are statewide, the localized poverty percentage should be a factor in funds distribution.

Administrative feasibility should also be taken into account in program design. Application processes should be clear and available via multiple methods with guidelines and timelines clearly communicated.

b. What income thresholds, vulnerability indicators, or energy burden metrics to determine program eligibility?

A 200% FPL captures many vulnerable families. However, we operate Senior Tax programs that have a 300% FPL and we still find many of these seniors vulnerable when an unexpected cost arises. HUD generally suggests rent should no more than 30% of your income. We are seeing many, many neighbors with a much higher housing burden, due to rising costs. For that reason, it is difficult to offer a firm energy burden metric. However, we feel overall rent/mortgage costs as a ratio of income should also be a factor.

c. Would automatic or categorical enrollment be effective?

Recipients of SSI, SSDI, TANF, SNAP

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 quality assurance audits would be a solid risk-management process. In addition, applicants can be provided a post-assistance survey to help inform administrators.

e. What program design elements can be included that prevent fraud, collecting duplicate benefits, or mismanagement while maintaining accessibility for eligible households?

Partnership with Community Action Agencies would help coordinate activities. These agencies already have systems in place, including a database, that tracks information and assistance. In addition, an application process that allows for easy upload of needed documentation (income, lease, utility bill, etc.) would ensure the correct documentation is attached. Many of those served access the internet through phones rather than large screen devices. All application processes should be mobile friendly with a paper application process for those who prefer it.

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)?

As stated above, most people served by our agency access the internet on their phone. Many do not have large screen devices. Any application process must be available online and it must be mobile friendly. An online portal could be helpful as long as it is clear and has a chat or help function. In addition, in program design, the needed documentation should be identified, as well as any alternatives that may be used. Many that we serve have a hard time finding all of the documentation needed for application processes. Example: For income, a guideline could be established that said they could submit a paycheck stub, a screenshot of an online payment portal (common in many service jobs) or a letter from their employer.

b. What program design elements would reduce administrative workload while maintaining accurate eligibility determinations?

Unknown other than a cohesive system with online access

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

One funding source, during ARPA funding, allowed applicants to sign an attestation regarding their income. The program proactively aimed to decrease the applicant burden.

Stakeholder Question 4: METRICS AND EVALUATION

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

Number of days from application until payment is made; Number of households that avoided disconnection; Average payment/household; Average payment by applicant income

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

Number of applicants per defined community

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

Survey to evaluate all of these given pot-assistance; Average time to complete application; Average time for questions answered

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

Results of quality assurance monitoring per defined time period

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?

Number of repeat applicants; For Wx, average energy cost before and after service

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?

Any utility rate structure is going to have an impact on assistance programs for low-income neighbors.

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

It is more predictable and makes it easier to budget. However, there are going to be unexpected costs that arise for these families and should there be fixed charges, there has to be grace built into the program. Missing or being late on a fixed charge account should not result in exorbitant increases for the family.

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

Many families cannot absorb seasonal change costs. It is inevitable, after a cold snap or a heat wave, that we hear from many folks. Many of them report their utilities to be medically necessary or have young children in the home. One particular utility that is susceptible to this is propane. Those that can afford it, can prebuy their propane in the summer when it's cheaper and they will be set for the upcoming winter and fall. However, those that cannot do this have to pay the higher prices, as needed in the winter, often just getting the minimum delivery because that's all they can afford.

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

I know that households accommodate this by trying to be mindful of what appliance are running at any particular time. Some have reported getting up in the middle of the night to use their large appliances, such as their washer, so they don't have a large surcharge.

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)

I'm not sure that we have identified these elements. Often, when other household budgetary needs are met (through other types of assistance or on their own,) utilities become less of a burden. For those that are low-income, it's about the full picture.

Stakeholder Question 7: IMPLEMENTATION CHALLENGES

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

A network of those providing the assistance should be developed so best practices can be shared and so problem solving can be accomplished.

In addition, reporting requirements and timelines should be clearly communicated and be designed with administrative burden in mind.