



**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: Apr 24, 2026

Community Action Partnership of Northeast Missouri

**Our mission is to assist and empower individuals, families, and communities to
achieve their greatest potential.**

"Our vision is a better way of life!"

Organization: Community Action Partnership of Northeast Missouri
Name: Abbie Jennings
Title: LIHEAP Director
Date of Submission: April 24, 2026
Provider? Yes Please complete both Part A and Part B
Stakeholder only? No 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. Keeping Current 2. Keeping Cool 3. Dollar More 4. Homeless Challenge Funds (New Start Energy Relief) 5. Ameren Energy Relief Grant (One time payment) 6. Share the Warmth 7. LIHEAP 8. Weatherization

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	
Ameren Missouri		Keeping Current/Keeping Cool			-	
Program Start Date	2010	Program End Date	-	Total # Employ	2	
Job Title 1	LIHEAP Director	Duties	Verifies income eligibility, entering in pledges into The Ameren and The United Way websites	# Employ	1	
Job Title 2	LIHEAP Processor	Duties	Verifies income eligibility, entering in pledges into The Ameren and The United Way websites	# Employ	1	
Job Title 3		Duties		# Employ		
Annual Average Enrollment #	79	Monthly Average Enrollment #	7			
Comments	*The funding and reports are combined for these programs on The United Way site					

Provider Question 2: EVALUATION FOR EFFECTIVENESS

Do you conduct surveys to gauge effectiveness of this utility assistance program? No
Do you conduct any non-survey evaluations to gauge effectiveness of this program? No
Do you share the results...with utility partners? N/A
If you conduct surveys or other evaluations, please explain the process you use.
We conduct a Community Needs assessment every 3 years for all constituent needs

Provider Question 3: STRENGTHS AND WEAKNESSES OF ASSISTANCE PROGRAMS
Based on experience and participant feedback, what are the STRENGTHS of this program?
Having bill credits applied, being able to budget steady amounts for their monthly bills, and agencies being able to assist with flexible dollars in crisis situations are vital when all other funding is utilized.
Based on experience and participant feedback, what are the WEAKNESSES of this program?
The funding hasn't been available since June of 2025 for new participants
If you have it, please provide empirical and/or anecdotal data that support your comments.

Utility Company		Program Name		State Agency Partner	
Ameren Missouri		Dollar More		-	
Program Start Date	2003	Program End Date	-	Total # Employ	2
Job Title 1	LIHEAP Director	Duties	Verifies income eligibility, entering in pledges into The Ameren and The United Way websites	# Employ	1
Job Title 2	LIHEAP Processor	Duties	Verifies income eligibility, entering in pledges into The Ameren and The United Way websites	# Employ	1
Job Title 3		Duties		# Employ	
Annual Average Enrollment #	105	Monthly Average Enrollment #		9	
Comments					
Provider Question 1: PROGRAM ADMINISTRATION					

Provider Question 2: EVALUATION FOR EFFECTIVENESS
Do you conduct surveys to gauge effectiveness of this utility assistance program? No
Do you conduct any non-survey evaluations to gauge effectiveness of this program? No
Do you share the results...with utility partners? N/A
If you conduct surveys or other evaluations, please explain the process you use.
We conduct a Community Needs assessment every 3 years for all constituent needs

Provider Question 3: STRENGTHS AND WEAKNESSES OF ASSISTANCE PROGRAMS
Based on experience and participant feedback, what are the STRENGTHS of this program?
Having bill credits applied, being able to budget steady amounts for their monthly bills, and agencies being able to assist with flexible dollars in crisis situations are vital when all other funding is utilized.
Based on experience and participant feedback, what are the WEAKNESSES of this program?

There isn't enough funding vs the need

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

Utility Company		Program Name		State Agency Partner	
Ameren Missouri		New Start Energy Relief/Homeless Challenge		-	
Program Start Date	2025	Program End Date	-	Total # Employ	1
Job Title 1	LIHEAP Director	Duties	Verifies old Acct/bill, contacts Ameren, enters pledges into The Ameren and The United Way websites	# Employ	1
Job Title 2		Duties		# Employ	
Job Title 3		Duties		# Employ	
Annual Average Enrollment #	15	Monthly Average Enrollment #	1		
Comments					
Provider Question 1: PROGRAM ADMINISTRATION					

Provider Question 2: EVALUATION FOR EFFECTIVENESS	
Do you conduct surveys to gauge effectiveness of this utility assistance program? No, not ongoing; however, there is a grievance process that allows for comments. Individuals often express their satisfaction when applying and being approved. Issues are addressed immediately.	
Do you conduct any non-survey evaluations to gauge effectiveness of this program? No	
Do you share the results...with utility partners? N/A	
If you conduct surveys or other evaluations, please explain the process you use.	
We conduct a Community Needs assessment every 3 years for all constituent needs	

Provider Question 3: STRENGTHS AND WEAKNESSES OF ASSISTANCE PROGRAMS	
Based on experience and participant feedback, what are the STRENGTHS of this program?	
It's an incredible program. We are able to help those that have been unhoused establish services with amounts LIHEAP may not have been able to cover.	
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.	

Utility Company		Program Name		State Agency Partner	
Ameren Missouri		Energy Relief Grant		-	
Program Start Date	2025	Program End Date	-	Total # Employ	2
Job Title 1	LIHEAP Director	Duties	Verified owed amount was over \$150.00, entered pledge into The Ameren and The United Way websites	# Employ	1
Job Title 2	LIHEAP Processor	Duties	Verified owed amount was over \$150.00, entered pledge into The Ameren and The United Way websites	# Employ	1
Job Title 3		Duties		# Employ	
Annual Average Enrollment #	262	Monthly Average Enrollment #	22		
Provider Question 1: PROGRAM ADMINISTRATION					

Provider Question 2: EVALUATION FOR EFFECTIVENESS	
Do you conduct surveys to gauge effectiveness of this utility assistance program? No, not ongoing; however, there is a grievance process that allows for comments. Individuals often express their satisfaction when applying and being approved. Issues are addressed immediately.	
Do you conduct any non-survey evaluations to gauge effectiveness of this program? No	
Do you share the results...with utility partners? N/A	
If you conduct surveys or other evaluations, please explain the process you use.	
We conduct a Community Needs assessment every 3 years for all constituent needs	

Provider Question 3: STRENGTHS AND WEAKNESSES OF ASSISTANCE PROGRAMS	
Based on experience and participant feedback, what are the STRENGTHS of this program?	
We were able to apply it to the households we felt were in need.	
Based on experience and participant feedback, what are the WEAKNESSES of this program?	
It was a one time payment for \$150.00 per account	
If you have it, please provide empirical and/or anecdotal data that support your comments.	

Utility Company		Program Name		State Agency Partner	
Liberty Utilities		Share the warmth		-	
Program Start Date	2020?	Program End Date	-	Total # Employ	2
Job Title 1	LIHEAP Director	Duties	Applies funds when households are in crisis situations into the Liberty Portal	# Employ	1
Job Title 2		Duties		# Employ	
Job Title 3		Duties		# Employ	
Annual Average Enrollment #	12	Monthly Average Enrollment #	1		
Provider Question 1: PROGRAM ADMINISTRATION					

Provider Question 2: EVALUATION FOR EFFECTIVENESS	
Do you conduct surveys to gauge effectiveness of this utility assistance program? No, not ongoing; however, there is a grievance process that allows for comments. Individuals often express their satisfaction when applying and being approved. Issues are addressed immediately.	
Do you conduct any non-survey evaluations to gauge effectiveness of this program? No	
Do you share the results...with utility partners? N/A	
If you conduct surveys or other evaluations, please explain the process you use.	
We conduct a Community Needs assessment every 3 years for all client needs	

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?	
Very little funding. With rates rising, I feel there are less people rounding their bills up to donate to these funds.	
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)?	They help by being an ongoing program, and not one time payments that provide immediate relief
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, and hardship protections
c. What customer categories (e.g., irregular income, medical debt, unbanked, etc.) are currently underserved or excluded by existing programs?	Those households that make just above the income guidelines are excluded from any assistance
d. What aspects of existing programs limit or reduce effectiveness (e.g., funding caps, restrictive eligibility windows, administrative barriers, etc.)?	Funding caps vs the actual need
e. What specific modifications or alternative models (e.g., income-based caps or automatic enrollment) could close identified gaps?	

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?	Monthly income totals vs energy amounts per household? The most vulnerable first being the elderly, disabled, and young children.
b. What income thresholds, vulnerability indicators, or energy burden metrics to determine program eligibility?	
c. Would automatic or categorical enrollment be effective?	Possibly
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 after receiving assistance to ensure accurate information was submitted.
e. What program design elements can be included that prevent fraud, collecting duplicate benefits, or mismanagement while maintaining accessibility for eligible households?	The United Way and Ameren site modified to detect duplicate names, addresses and or ss numbers that have already received program credits.

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)?	Online portals and single point of entry systems are the best.

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

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

Stakeholder Question 4: METRICS AND EVALUATION

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

Pre and Post surveys

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

Surveys

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

Satisfaction surveys

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

Random auditing

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?

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

Increases bills for every household since it is not based on their usage.

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

Bills are not steady or predictable amounts which could lead to a crisis

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

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)

Payment arrangements, payment forgiveness programs,

Stakeholder Question 7: IMPLEMENTATION CHALLENGES

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

During peak LIHEAP season, time is a major factor in entering in date, and training if it's a new program.