

**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:



Economic Security Corporation of S W Area

Mission Statement of agency: To provide comprehensive services that instill hope and share opportunities to eliminate the conditions of poverty and help neighbors achieve self-sufficiency.

Vision Statement of Agency: A thriving community of neighbors that is free from poverty.

Organization: Economic Security Corporation of S W Area
Name: Tammy Walker
Title: Deputy Director
Date of Submission:
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. H2O 3. Dollar Help 4. Weatherization- Spire 5. Weatherization – Liberty 6. Weatherization - DOE

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		Dept. of Social Services	
Program Start Date	11/1/2025	Program End Date	9/30/2026	Total # Employ	7-10
Job Title 1	LIHEAP Coordinator	Duties	Program oversight, process applications and review applications.	# Employ	1
Job Title 2	Assistant LIHEAP Coordinator	Duties	Program oversight, process applications and review applications.	# Employ	1
Job Title 3	Energy Assistance Worker	Duties	Process applications	# Employ	4
Job Title 4	Temporary Workers	Duties	Process applications	# Employ	1-3
Job Title 5	Admin Assistant	Duties	Check apps and Bill & Batch	# Employ	1
Annual Average Enrollment #	12,965	Monthly Average Enrollment #	1080		
Comments	We've had the program since 1991				

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 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.	

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We collect success stories of how the assistance helped the family.
We have surveys available in all county offices, we encourage other departments to utilize the survey in their outer offices, we have surveys available online and we mail them out with each ECIP letter.

Provider Question 3: STRENGTHS AND WEAKNESSES OF ASSISTANCE PROGRAMS
Based on experience and participant feedback, what are the STRENGTHS of this program?
Funds to help with repairs and replacements of heating and ac units.
EA Program assists the primary heating cost, for eligible households, one time a year.
Based on experience and participant feedback, what are the WEAKNESSES of this program?
Policy guidelines on how quickly to process applications, definition of crisis and the benefit amounts are too low and often don't make a dent on the high bills.
Program changes during the program year.
Not having a Program Manual at/before the program year starts.
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	
Missouri American Water		H2O		None	
Program Start Date	2025	Program End Date		Total # Employ	
Job Title 1	Outreach Worker	Duties	Conduct intake, assessment & referral. Determine eligibility for program.	# Employ	1
Job Title 2		Duties		# Employ	
Annual Average Enrollment #	94 HH	Monthly Average Enrollment #		10 HH	
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 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 type="checkbox"/> Yes <input checked="" type="checkbox"/> No	
If you conduct surveys or other evaluations, please explain the process you use.	
We have surveys available in all county offices, we encourage other departments to utilize the survey in their outer offices, we have surveys available online and we mail them out with each ECIP letter.	
We collect success stories on how the assistance helped the family.	

Provider Question 3: STRENGTHS AND WEAKNESSES OF ASSISTANCE PROGRAMS
Based on experience and participant feedback, what are the STRENGTHS of this program?
There are few resources for water assistance in our four-county area so having access to funds to help some customers is good.
Based on experience and participant feedback, what are the WEAKNESSES of this program?
We do not receive enough funds to fully meet the need. We receive a very small admin fee that does not cover our costs. We must use other funds to cover our costs.
If you have it, please provide empirical and/or anecdotal data that support your comments.
We are allotted funds quarterly and we spend our funds before the quarter ends. We receive many calls for assistance after we spend our funds.

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Provider Question 1: PROGRAM ADMINISTRATION					
Utility Company		Program Name		State Agency Partner	
Spire		Dollar Help		None	
Program Start Date	11/1/2025	Program End Date	9/30/2026	Total # Employ	6-9
Job Title 1	LIHEAP Coordinator	Duties	Program oversight, pledge on accounts and review applications.	# Employ	
Job Title 2	Assistant LIHEAP Coordinator	Duties	Program oversight, pledge on accounts, and review applications.	# Employ	
Job Title 3	Energy Assistance Worker	Duties	Pledge on accounts	# Employ	4
Job Title 4	Temporary Workers	Duties	Pledge on accounts	# Employ	1-3
Job Title 5	Admin Assistant	Duties	Check apps and Bill & Batch	# Employ	1
Annual Average Enrollment #	214	Monthly Average Enrollment #	17.8		
Comments	Program runs with LIHEAP Start/End dates. We've had this program since 2019?				

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 checked="" type="checkbox"/> Yes <input type="checkbox"/> No
Do you share the results...with utility partners? <input checked="" type="checkbox"/> 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 have surveys available in all county offices, we encourage other departments to utilize the survey in their outer offices, we have surveys available online and we mail them out with each ECIP letter.	
We collect success stories on how the assistance helped the family.	

Provider Question 3: STRENGTHS AND WEAKNESSES OF ASSISTANCE PROGRAMS	
Based on experience and participant feedback, what are the STRENGTHS of this program?	
Having the extra funds to pledge toward accounts is helpful as sometimes more funds are needed to keep service on.	
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.	

Provider Question 1: PROGRAM ADMINISTRATION					
Utility Company		Program Name		State Agency Partner	
Spire		Weatherization		None	
Program Start Date	2019	Program End Date		Total # Employ	7-10
Job Title 1	Weatherization Director	Duties	Program oversight. Reports for fiscal invoicing. Direct staff day to day.	# Employ	1
Job Title 2	Weatherization Tech	Duties	Hands on in the field. Responsible for day to day activities on the job.	# Employ	1-3
Job Title 3	Weatherization Crew Chief	Duties	Hands on in the field. Supervises Weatherization Techs.	# Employ	1-2
Job Title 4	Weatherization Auditor	Duties	Home inspection for initial and quality control. Confirms that jobs are ready and complete.	# Employ	1-2

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Job Title 5	Weatherization Coordinator	Duties	Intake and follow up with clients along with inventory.	# Employ	1-2
Annual Average Enrollment #	120	Monthly Average Enrollment #	10		
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 type="checkbox"/> No <input type="checkbox"/> ...with state agencies?	<input 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?	
Having the funds is extremely important to help families feel comfortable and safe.	
Based on experience and participant feedback, what are the WEAKNESSES of this program?	
Guidelines on reporting and receiving the funds in a timely manner	
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	
Liberty		Weatherization		None	
Program Start Date	1999	Program End Date		Total # Employ	7-10
Job Title 1	Weatherization Director	Duties	Program oversight. Reports for fiscal invoicing. Direct staff on day to day.	# Employ	1
Job Title 2	Weatherization Tech	Duties	Hands on in the field. Responsible for day to day activities on the job.	# Employ	1-3
Job Title 3	Weatherization Crew Chief	Duties	Hands on in the field. Supervises Weatherization Techs.	# Employ	1-2
Job Title 4	Weatherization Auditor	Duties	Home inspection for initial and quality control. Confirms jobs are ready and complete.	# Employ	1-2
Job Title 5	Weatherization Coordinator	Duties	Intake and follow up with clients along with inventory.	# Employ	1-2
Annual Average Enrollment #	144	Monthly Average Enrollment #	12		
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 type="checkbox"/> No <input type="checkbox"/> ...with state agencies?	<input 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?	

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Having the funds is extremely important to help families feel comfortable and safe.
Based on experience and participant feedback, what are the WEAKNESSES of this program?
Guidelines on reporting and receiving the funds in a timely manner
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		DOE	
Program Start Date	1977	Program End Date		Total # Employ	7-10
Job Title 1	Weatherization Director	Duties	Program oversight. Reports for fiscal invoicing. Direct staff on day to day.	# Employ	1
Job Title 2	Weatherization Tech	Duties	Hands on in the field. Responsible for day to day activities on the job.	# Employ	1-3
Job Title 3	Weatherization Crew Chief	Duties	Hands on in the field. Supervises Weatherization Techs.	# Employ	1-2
Job Title 4	Weatherization Auditor	Duties	Home inspection for initial and quality control. Confirms jobs are ready and complete.	# Employ	1-2
Job Title 5	Weatherization Coordinator	Duties	Intake and follow up with clients along with inventory.	# Employ	1-2
Annual Average Enrollment #	180	Monthly Average Enrollment #	15		
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 type="checkbox"/> No <input type="checkbox"/> ...with state agencies?	<input 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?	
Having the funds is extremely important to help families feel comfortable and safe.	
Based on experience and participant feedback, what are the WEAKNESSES of this program?	
Guidelines on reporting and receiving the funds in a timely manner	
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	
SPIRE		Customer Charge Program			
Program Start Date	3/1/2026	Program End Date		Total # Employ	6
Job Title 1	LIHEAP Coordinator	Duties	Program oversight, pledge on accounts and review applications.	# Employ	1
Job Title 2	Assistant LIHEAP Coordinator	Duties	Program oversight, pledge on accounts, and review applications.	# Employ	1
Job Title 3	Energy Assistance Worker	Duties	Pledge on accounts	# Employ	4

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Annual Average Enrollment #	102 (new program)	Monthly Average Enrollment #	51
Comments	This is the first year we have had this program. Hopefully, it will be an ongoing program.		

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 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 type="checkbox"/> Yes <input checked="" type="checkbox"/> No	
If you conduct surveys or other evaluations, please explain the process you use.	
We have surveys available in all county offices, we encourage other departments to utilize the survey in their outer offices, we have surveys available online and we mail them out with each ECIP letter.	
We collect success stories on how the assistance helped the family.	

Provider Question 3: STRENGTHS AND WEAKNESSES OF ASSISTANCE PROGRAMS
Based on experience and participant feedback, what are the STRENGTHS of this program?
Easy to enroll a household in the program.
Saves each enrolled household about \$20 per month for 12 months.
We earn \$15.00 per enrollment.
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.

10**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)?
	Our existing programs do have a positive impact on housing stability. Some families utilize programs like LIHEAP to stretch their budgets from year to year.
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.)?
	The monthly reduction of the customer service charge is very helpful. The Energy Assistance payment in the winter months is helpful too as customers do not need to be in crisis to receive it.
c.	What customer categories (e.g., irregular income, medical debt, unbanked, etc.) are currently underserved or excluded by existing programs?
	We see that some elderly households are less likely to apply for ECIP as they do not want to receive a shut off notice to get assistance.
d.	What aspects of existing programs limit or reduce effectiveness (e.g., funding caps, restrictive eligibility windows, administrative barriers, etc.)?
	Funding caps for LIHEAP – ECIP – winter and summer caps are way too low. We have families max out on assistance with one application due to very large bills. ECIP – the crisis definition is too restrictive. We were able to serve many more families, more easily, when families could simply say they were unable to afford their bill. We were allowed to do this for one year only. EA benefits are too low as well. Energy Assistance- this program should be year-round and not just in the winter months. Families can buy propane at a much cheaper cost in the summer with that program if it were available year-round. The time frame in which we must adhere to in processing crisis and terminated applications is very restrictive.
e.	What specific modifications or alternative models (e.g., income-based caps or automatic enrollment) could close identified gaps?
	Change crisis definition, make it less restrictive. Automatic enrollment for elderly households.

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?
	Administrative feasibility. We receive very little funds to administer LIHEAP. The program is complicated and cannot be run solely on temporary and new staff each year as training and learning the program takes a lot of time.
b.	What income thresholds, vulnerability indicators, or energy burden metrics to determine program eligibility?
	LIHEAP (60% SMI, to receive ECIP they must be in a verifiable crisis)
c.	Would automatic or categorical enrollment be effective?
	It would be for elderly customers for LIHEAP.
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?
	Currently, a quarterly audit of files is conducted during the year. We also receive a variety of reports weekly from the state that are used to monitor the progress of our processing, etc.
e.	What program design elements can be included that prevent fraud, collecting duplicate benefits, or mismanagement while maintaining accessibility for eligible households?

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With LIHEAP there are already a number of reports that the state shares with us that help prevent fraud. Example: Date of Death report. The system that is used for Energy Assistance processing will also alert us if someone with the same SS# exists in another household.

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 for elderly households. Online portals would be helpful but not as the only way to apply as some customers don't have access to internet or are not comfortable with technology.

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

For LIHEAP, if they are a SNAP household we should not have to inquire about resources if over \$3,000; SNAP office should have already done that.

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?

Follow up data and client interviews. Possibly even a year later

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

Number of applications received/enrollments/number served compared to previous years

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 satisfaction via a survey.

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

SNAP

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?

Follow up conversations and data with the clients.

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?

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

Seasonal rates: propane is cheaper in the summer however the energy assistance program ends May 31st so this benefit cannot be used to purchase propane when it is at a cheaper rate. With the limit of \$300 in the summer for ECIP – households are not using this benefit for propane but rather an electric bill.

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)

Debt forgiveness would be helpful as some customers' bills are so high they are likely to never get it paid down. Even with our very limited assistance we are unable to help make a dent in these high bills. My example is with Liberty. We have seen many customers come in for assistance with bills in the thousands. The highest bill we have seen so far was \$14,000 and we have had many others over \$5,000.

Stakeholder Question 7: IMPLEMENTATION CHALLENGES

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