

BEFORE THE MISSOURI PUBLIC SERVICE COMMISSION

Comments of Google LLC

Docket Sheet - OW-2026-0085

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

INTRODUCTION

Google LLC ("Google") submits these comments in response to the Missouri Public Service Commission's ("Commission") request for public comments in Case No. OW-2026-0085 regarding investor-owned utility assistance programs and the implementation of special alternative residential customer rates authorized under Section 393.1680 RSMo.

As a major commercial electricity customer with operations and ongoing data center development across Missouri, Google has a direct, long-term interest in ensuring the state's electric grid remains reliable, clean, resilient, and affordable for all users.

Google has [committed \\$20 million](#) to support energy affordability, energy efficiency, and community resilience in Missouri, including an initial \$1.5 million partnership with the North East Community Action Corporation (NECAC) to support residential weatherization in Montgomery County. We will continue to partner with local governments, utilities, and non-profits in Missouri to deploy the remainder of funds. Google is encouraged by the potential catalytic impact these investments can have, especially when paired with existing utility, state, and federal funds. We believe these funds are most effective when deployed to address remaining systemic gaps, such as workforce development and essential pre-weatherization initiatives.

Google supports the Commission's efforts to review and modernize utility assistance programs. Drawing on our experience partnering with state energy offices, utilities, and local community action agencies across the country, Google highlights four broad principles for the Commission's consideration:

OPPORTUNITIES TO STRENGTHEN MISSOURI'S ENERGY AFFORDABILITY FRAMEWORK

Flexibility to Layer and Braid Funding Sources: Energy affordability programs deliver the greatest impact when different funding streams can be seamlessly combined. Google supports regulatory frameworks that provide utilities and program administrators the flexibility to "braid" ratepayer-funded assistance with state initiatives, federal resources (such as Weatherization Assistance Program funds and Home Energy Rebates), and philanthropic contributions. Enabling these funding sources to work in tandem maximizes the total financial benefit delivered to participating households and ensures that program dollars stretch further. This paired with increased transparency and stakeholder information sharing can shed light on gaps remaining.

Supporting Critical Home Repairs, Pre-Weatherization, and Health & Safety Upgrades: A frequent barrier to delivering energy efficiency is the physical condition of older or

deferred-maintenance homes. Structural issues, roof leaks, moisture, and outdated electrical wiring often disqualify vulnerable households from participating in standard utility or government weatherization programs. Google supports expanding opportunities within utility-assistance programs to fund critical pre-weatherization repairs and health-and-safety improvements. Addressing these foundational barriers ensures that Missouri families can remain safe, dry, and healthy in their homes while unlocking their ability to access deeper, long-term energy savings through available state and federal funding.

Streamlining Eligibility, Intake, and Program Implementation: To ensure available assistance funds are fully deployed and reach the greatest number of eligible families, program accessibility should be as frictionless as possible. Google supports:

- **Simplified Verification:** Leveraging categorical eligibility to reduce redundant paperwork.
- **Integrated Intake:** Supporting "one-stop" application and intake processes through trusted local partners, such as Community Action Agencies.
- **Easing Implementation Burdens:** Designing turnkey implementation models that minimize the administrative, time, and coordination burdens placed on homeowners and renters during home energy improvements.

Enabling Households to Support and Benefit from a Stronger Grid: Affordability programs can empower households to become active participants in building a more resilient electric grid. Google supports program designs that open pathways for LMI customers to participate in distributed energy resources (DERs), voluntary demand response initiatives, and community solar programs. By participating in clean energy and load-flexibility solutions that lower their own bills, residential customers can simultaneously help reduce peak grid strain and support system-wide reliability for all Missourians.

There is significant untapped demand side management potential beyond the data centers' fencelines. At scale, energy efficiency and similar efforts have quantifiable positive impacts on the total energy system, driving down system demand and lowering costs for all ratepayers. Demand side resources can be deployed now and immediately benefit all ratepayers.

Large customers who are willing to fund system-benefitting demand side resources, including investments in energy efficiency and distributed energy resources, could receive credit for some portion of the additional capacity unlocked by those investments while supporting energy affordability statewide.

To socialize this concept with stakeholders and utilities and to understand its practical value, Google was proud to sponsor a [study](#) published by the Alliance to Save Energy and The Ad Hoc Group this year. The report introduces the 'Bring Your Own Distributed Capacity' (BYODC) framework, under which a large-load customer (like a hyperscaler) directly funds strategic demand-side investments—such as home weatherization, heat pumps, and smart thermostats—on the local utility's distribution network. By targeting these investments in low-to-moderate-income (LMI) communities, the model directly reduces local energy burdens while simultaneously relieving stress on the local grid and supporting new load growth.

The Commission should encourage utilities to adopt new regulatory frameworks to incentivize and reward demand-side participation - be it through on-site demand response or support for off-site DSM resources that benefit the grid.

CONCLUSION

Google commends the Commission for opening this working docket (Case No. OW-2026-0085) and creating a collaborative forum to evaluate and enhance utility assistance across the state. We look forward to continuing our engagement with the Commission, investor-owned utilities, Community Action Agencies, and local community partners to help advance practical, impactful energy affordability solutions in Missouri.