

August 22, 2019

Mark Johnson  
Executive Director and Secretary  
Washington Utilities and Transportation Commission  
621 Woodland Sq. Loop SE  
P.O. Box 47250  
Lacey, WA 98503

State Of WASH.  
UTIL. AND TRANSP.  
COMMISSION

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**Re: UE-190646/UG-190648: Avista Petition For Modification of Avista's Senior and Disabled Rate Discount Program**

The Energy Project (TEP) respectfully provides these comments supporting the petition to implement the recommendation of Avista's LIRAP Advisory Committee to make permanent the LIRAP Senior and Disabled Rate Discount Pilot Program (Pilot). The collaboration between LIRAP Advisory Committee members, including UTC Staff, Avista employees, Public Counsel, Northwest Energy Coalition, The Energy Project, and the various Community Action Partnership organizations delivering the program was exemplary. This program design and implementation was the result of many hundreds of hours of research, communication and cooperation with the end goal of meeting the specific needs of this customer class.

A brief overview of the key findings published in the evaluation of the Pilot published by Evergreen Economics in August 2017 shows that:

- The Pilot provided assistance to disabled customers who previously were not served by any specific Avista programs.
- The Pilot program provided a higher benefit to high-energy users who often struggle to pay their utility bills.
- The Pilot program drove more customers to call the agencies, even if they were not eligible, meaning the agencies were able to refer more people to other assistance programs.

The rate discount Pilot appealed to some customers who were eligible for the Senior Grant program but were averse to the program. In particular, many independent-minded seniors were reluctant to sign up for the Senior Grant program because they viewed a grant as a welfare or "hand out" program, whereas, these customers perceived the rate discount as a billing option, or perk, that they felt comfortable taking advantage of.

TEP is pleased to see this recommendation brought before the Commission and commends the Company and members of the LIRAP Advisory Committee for their dedication to this effort.

Sincerely,



Cc: Linda Gervais (via email)

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