

**BEFORE THE
WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION**

In the Matter of the Joint Petition of)	
Avista Corporation, Commission Staff,)	DOCKET NOS. UE-140188 & UG-140189
Public Counsel, Energy Project, NWIGU)	(Consolidated)
and ICNU Request Modification and a)	
Proposed Addition to the Company’s)	JOINT PETITION
Low-Income Rate Assistance Program)	
)	
)	
)	

I. PETITIONER

1 COMES NOW, Avista Corporation (“Avista” or the “Company”), the Washington Utilities and Transportation Commission Staff (“Staff”), the Public Counsel Unit of the Office of the Attorney General (“Public Counsel”), the Energy Project (“Energy Project”), Northwest Industrial Gas Users (“NWIGU”), and the Industrial Customers of Northwest Utilities (“ICNU”), (collectively referred to as the “Petitioners”) hereby request that the Washington Utilities and Transportation Commission (“Commission” or “UTC”) issue an Order approving the modifications, additions and associated tariff’s related to the Company’s Low-Income Rate Assistance Program (“LIRAP”) as proposed in this petition. In accordance with WAC 480-07-395, required names and addresses of Petitioners are as shown below. Please direct all correspondence related to this Petition as follows:

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II. BACKGROUND

2 Avista's LIRAP, approved by the UTC in 2001, collects funding through electric and natural gas tariff surcharges on Schedules 92 and 192. These funds are distributed by Community Action Agencies ("Agencies") in a manner similar to the Federal- and State-sponsored Low-Income Home Energy Assistance Program ("LIHEAP").¹ LIRAP, like LIHEAP assistance, can help a household avoid having its utility service shut off, or help reestablish service after a disruption, and can also help pay ongoing heating costs, assisting households that are least able to pay their energy bills. The current LIRAP program is comprised of three components:²

¹ The LIHEAP is a federal program established in 1981 and funded annually by Congress. These federal dollars are released directly to states, territories, tribes and the District of Columbia who use the funds to provide energy assistance to low-income households. LIHEAP offers financial assistance to qualifying low-income households to help them pay their home heating or cooling bills. Under federal law, a household must either have members whom receive Social Security income or Supplemental Nutrition Assistance Program benefits, or have income below either 150 percent of the federal poverty level (FPL) or 60 percent of state median income level, whichever is higher. However, states can set lower income thresholds if they choose to. Some states use non-federal funds to expand their programs to include more households or to provide higher benefits. Washington State chooses to use 125% of the FPL as the threshold and is qualified only for heating days, not cooling.

² Attached as Attachment A is a diagram of Avista's Low-Income Energy Assistance programs.

- LIRAP Heat - mimics the LIHEAP program in terms of income eligibility, intake³ requirements, and benefit calculation.
- LIRAP Share Emergency⁴ - LIRAP Share Emergency emulates the Project Share program funded through voluntary contributions that are used to help customers in emergency situations.
- LIRAP Senior Energy Outreach - targets a third distinct customer group by providing a one-time per program year benefit of \$100 or \$300 to seniors with incomes up to 200 percent of the federal poverty level (“FPL”).

III. INTRODUCTION

³ In the Company’s 2014 general rate case,⁵ the Commission modified the settlement and ordered that the LIRAP funding increase proposed in the Settlement be doubled, for a total electric LIRAP funding increase of \$400,000 and a total natural gas LIRAP funding increase of \$428,000. Further, the Commission established a process for parties to file mutually agreed upon modifications and additions to the LIRAP program in a shorter timeframe than contemplated by the Settlement. If the parties are not able to agree upon modifications or additions to the program by June 1, 2015, they may file alternative or competing proposals with the Commission by July 1, 2015. A workgroup comprised of various stakeholders (“Workgroup”)⁶ held their first meeting via telephone on December 19, 2014, then followed with six face-to-face all day workshops,⁷ along with several planning conference calls from January 30 through May 1, 2015.

⁴ The following four goals were informed by the Commission’s order in this case,⁸ and guided the program modifications and additions ultimately agreed to by the Workgroup:

³ LIRAP intake is a process established to screen, acquire and record all mandatory household documentation to determine qualifications for heating assistance.

⁴ Emergency Assistance funded by LIRAP that replicates Project Share, customers cannot receive both but can receive other forms of energy assistance. Maximum payment guideline: \$300.

⁵ Dockets UE-140188 and UG-140189 (consolidated).

⁶ The Company, Commission Staff, The Energy Project, Public Counsel, NWIGU, and Agency representation from Spokane Neighborhood Action Partners (“SNAP”) and Rural Resources Community Action.

⁷ Meeting Agendas and Minutes are provided as Attachment B.

⁸ Dockets UE-140188 and UG-140189 (consolidated), Order 05, ¶ 39 (Nov. 25, 2014).

- Keep customers connected to their energy service;
- Provide assistance to more customers than are currently served;
- Lower the energy burden of LIRAP participants; and
- Ensure that LIRAP has the appropriate data to assess program effectiveness.

5 Petitioners propose modifications to the current LIRAP program, as discussed below, as well as a rate discount program for senior and disabled households with fixed incomes between 126-200 percent of FPL.

6 Accordingly, by this Joint Petition, it is requested that the Commission:

1. Approve the proposed modifications to the LIRAP Program;
2. Approve new tariffs Schedules 2, 102, 89, and 189 for establishing the Rate Discount Pilot Program for Low-Income Seniors and Disabled Households;
3. Approve an increase of the funding plan under the LIRAP for the Senior/Disabled Rate Discount Pilot through Schedules 92 and 192; and
4. Recognize the need for additional time to explore other alternatives such as Percent of Income Payment Plan (“PIPP”) and an Arrearage Management Plan (“AMP”), with pilot proposals or status updates by January 15, 2017.

IV. PROPOSED MODIFICATIONS

7 In an effort to understand potential impacts of proposed modifications or additions, the Workgroup spent time examining some of the challenges arising from the existing LIRAP program design. The following list of challenges and proposed modifications are the results from that work:

- a. **Challenge** – The current LIRAP design relies upon a practice whereby the Company reports to the Agencies monthly the amount of LIRAP funding collected in the prior

month and available for Agency use. This practice makes it challenging for Agencies to accurately estimate the number of clients to be served and staffing to retain at the start of the LIRAP program year.

- i. Proposed Modification - Funding for LIRAP will be allocated as a fixed annual budget, rather than collected and allocated on a month-to-month basis.
 - ii. Proposed Modification - Avista will inform each Agency of its fixed annual budget allocation by the end of May each year.
 - iii. Proposed Modification - Avista will establish a true-up mechanism for Schedules 92 and 192 and make an annual filing to adjust rates and collect the necessary program revenue, similar to the process for Schedules 91 and 191 for Avista's conservation programs.
 - a. Avista will make an annual filing by August 1st of each year, with a requested effective date of October 1st.
 - b. The total LIRAP revenue requirement would still be set in a general rate case or other proceeding. The true-up will adjust rates to collect the total LIRAP revenue requirement for each year.
 - c. Any funds unspent by the end of a program year will remain available for the next program year.
- b. **Challenge** – Each Agency that administers LIRAP dollars does so based on a variety of unique community and agency variables. Agencies currently lack flexibility to deploy LIRAP funding prior to monthly allocation.
- i. Proposed Modification - Agencies will have discretion to spend the allocated budget during the program year in the manner that best fits their operation of the program.
 - a. Total LIRAP expenditures must not exceed annual contract amount.
 - b. LIRAP direct service and non-direct services funding must be spent proportionately as agreed to in each agency's annual contract with Avista.
 - ii. Proposed Modification - LIRAP Heat grants may be awarded through the end of the program year according to Agencies' planned program implementation, rather than ending concurrent with the LIHEAP grants.
 - a. LIRAP Heat grant amounts will still be calculated based on heating costs, rather than year-round energy costs.

- c. **Challenge** – Currently there is no formalized forum focused on low-income energy assistance efforts. Over the course of the workshops it became clear that there is a need for an ongoing forum to discuss potential program modifications, collaboratively trouble-shoot challenges, and examine alternatives to better serve customers.
 - i. Proposed Modification - Avista will establish an ongoing energy assistance program advisory group to monitor and explore ways to improve the program.
 - a. Once established, the energy assistance advisory group will continue to explore possible pilots, as discussed in Section VII below, assess the results of the changes described in this proposal, and consider other subjects as appropriate, including an option to spread LIRAP benefits across multiple months, rather than as a one-time lump sum credit to a customer’s bill.
 - b. The energy assistance advisory groups will hold at least two meetings per year.
 - c. Membership
 - i. Avista will extend an invitation to all Washington LIRAP-providing Agencies, the Energy Project, the Washington Department of Commerce, Staff, Public Counsel, NWIGU, and ICNU to participate in the advisory group. Meetings will be open to other interested parties or individuals.
 - ii. The governance structure and meeting processes will be determined at the outset of the advisory group.
 - iii. Avista will not use LIRAP funds for any costs associated with the advisory group meetings. Avista will cover costs, as appropriate, for advisory group meetings as Washington utility-related operating costs.
- d. **Challenge** – Agencies experience increasing appointment no-show rates during warmer times of the year. When customers fail to attend appointments, Agencies experience higher administrative costs attempting to fill appointment slots.
 - i. Proposed Modification- Agencies will explore using texting capabilities to improve appointment attendance. The ability to use a text message to

remind clients of their upcoming appointment could assist in them keeping their appointments.

V. PROPOSED ADDITIONS

8 During the course of the workshops, the Workgroup explored various new program designs aimed at the four primary goals identified in Section III. In order to meet the goals of keeping customers connected and serving more customers, the Workgroup agreed that proposed additions to LIRAP should avoid reducing the total amount of LIHEAP funds allocated to the counties in Avista's service territory. The Washington Department of Commerce allocates LIHEAP funds to counties based on a rolling three-year average of recipient grants and number of low-income individuals. Additionally, so long as funds are available, LIHEAP assistance cannot be denied to eligible applicants. Avista originally designed LIRAP Heat to be implemented identical to LIHEAP in order to avoid the possibility of customers receiving both LIHEAP and LIRAP Heat assistance. Allowing customers to receive a different form of LIRAP assistance and then be eligible for LIHEAP assistance would reduce the customer's LIHEAP grant, and therefore over time, reduce the county-wide average grant amount on which county allocations of LIHEAP are based. Therefore, the parties decided not to pursue program designs that would adversely impact LIHEAP grant amounts.

9 The Workgroup discussed the pros and cons of many different program addition options including bill credit/grant programs, rate discounts, PIPP, percent of bill payment plans and AMP. Ultimately, the group narrowed its review to senior/disabled rate discounts, PIPP, and AMP program designs. After detailed exploration of each of these options, including modeling and draft proposals, the Workgroup agreed to propose the addition of a

senior/disabled rate discount pilot to LIRAP. The Workgroup selected this option because it is designed to reach an additional customer group and may reach more senior customers than are currently being served under the LIRAP senior's outreach program.⁹ Additionally, it will lower customers' energy burden, and may be more effective in keeping customers from getting disconnected than a one-time grant.

Senior/Disabled Rate Discount Pilot

10 The Workgroup proposes a rate discount program for senior and disabled households with fixed incomes between 126-200 percent of FPL. The Agencies have found that in some instances these customers will not currently take a grant because they believe others may be in greater need of those dollars. We believe this pilot design will better serve this population. It also expands the availability of assistance to a population not previously served: the disabled population with incomes in the 126-200 percent FPL range.

1. **Eligibility.** A rate discount will be offered to fixed-income seniors and fixed-income customers with a disability, whose household income is between 126-200 percent of the FPL. This income eligibility requirement is consistent with the existing LIRAP Senior Energy Outreach requirement. For example, recipients who have already been qualified for Social Security Disability (SSD). Senior customers who are eligible but do not want to receive the rate discount may still opt for the existing LIRAP Senior Energy Outreach grant.

⁹ Disabled customers with household income above 125 percent of FPL are not currently eligible for the existing LIRAP Senior program.

2. **Benefit Description.** The per kilowatt-hour and per therm rate discounts are designed to provide an average benefit of \$300 per participant per program year, which is consistent with the grant amount provided through the existing LIRAP Senior Energy Outreach program. The actual benefit amount received by each customer may be more or less than \$300 depending on actual usage. Dual fuel customers may receive the rate discount for either their electric bill or their natural gas bill, but not both. The customer may choose which bill to apply the discount to. Eligible customers may receive the rate discount for either one-year or the duration of the pilot intake period,¹⁰ whichever is longer. The rate discounts will be \$0.03153 per kilowatt-hour of electricity and \$0.40663 per therm of natural gas. The rate discount will be available year-round and applied equally to all three residential rate blocks. See Attachment C for the calculation of the rate discounts.
3. **Pilot Scope.** The rate discount pilot will be implemented by SNAP and Rural Resources, which will aim to enroll a total of 800 participants (700 – 87.5% SNAP, 100 – 12.5% RR) between October 1, 2015 and September 30, 2017. The total budget for the two-year pilot will be \$700,000, including \$50,000 for a third-party evaluation. The break out of the budget is included in Table No. 1 on page 12. Funding for the pilot will be additional to and tracked independently from the existing LIRAP program funding.
4. **Implementation.** For purposes of the pilot, the Senior/Disabled Rate Discount will be implemented in both an urban (SNAP) and a rural (Rural Resources) area to allow data collection in both environments for evaluation purposes. The pilot

¹⁰ Intake period runs annually from October 1, through September 30.

will be limited to these two Agencies at this time due to several factors including, but not limited to, the cost to modify Agency databases for the pilot, the impact on the cost of the third party evaluation, as well as additional monitoring by Avista operational staff. SNAP and Rural Resources will provide intake and determine customer eligibility for the rate discount. Avista will place eligible customers on the rate discount schedule, and assist with outreach for the pilot. Agencies will provide Avista and the energy assistance advisory group with updates on the pilot every six months. Avista will provide the Agencies with monthly updates on customer usage and actual benefits accrued to customers.

5. **Evaluation.** Avista will issue a Request for Proposals for a third-party evaluation of the rate discount pilot on or before July 16, 2015, to be completed by December 31, 2017. The evaluation should consider:
 - a. Whether the rate discount has significantly different impacts on participant disconnection rates compared to the existing LIRAP Senior Energy Outreach program.
 - b. The impact of the rate discount on participant energy burden, compared to the existing LIRAP Senior Energy Outreach program.
 - c. The overlap between rate discount participants and prior recipients of LIRAP Senior Energy Outreach grants; the number of new customers enrolled in the rate discount program who have not received prior assistance; and whether there are additional participants in the existing LIRAP Senior Energy Outreach program due to migration of customers to the rate discount.

- d. Participant reactions to the pilot and the reasons customers chose one program versus the other given the choice of a discount instead of a grant through the existing LIRAP Senior Energy Outreach program.
- e. Process elements, including whether the intake process for the rate discount is more or less resource intensive compared to the existing LIRAP Senior Energy Outreach program.
- f. The effectiveness of outreach methods.
- g. Actual customer benefits compared to pilot expectations.
- h. Recommended improvements to the pilot.

11 The design of the pilot avoids negative impact on county LIHEAP allocation because the rate discount pilot is available to customers who are above income eligibility requirements for LIHEAP. The pilot duration strikes a balance between ensuring sufficient data is available to assess the pilot's impact and effectiveness, and providing a meaningful benefit to customers in the second year of the pilot. Although allowing certain customers to receive the rate discount after the intake period may complicate the third-party evaluation, the Workgroup agreed that this is an appropriate trade-off to ensure adequate participation. Following the third-party evaluation, the energy assistance advisory group will discuss whether to recommend continuation, modification or termination of the Senior/Disabled Rate Discount pilot, and the Company will make appropriate filings with the Commission.

VI. FUNDING PLAN FOR MODIFICATIONS AND PROGRAM ADDITIONS

12 As it relates to the proposed modifications discussed earlier in this document, the Workgroup believes that a change in overall LIRAP funding is not required to implement those changes, as they are primarily administrative in nature.

13 For the proposed Senior/Disabled Rate Discount Pilot, the Workgroup proposes that overall LIRAP funding should be increased by \$350,000 per year for two years. This increase in annual funding will provide \$700,000 to fund the customer rate discount, start-up costs, administration, and evaluation of the pilot. The workgroup agreed to a contingency budget of approximately ten percent, because the actual customer benefits depend on usage. The summary table below provides an estimated budget of how the funds would be used:

Table No. 1

Startup Costs	\$ 25,360
Discount Rate	\$ 480,000
Program Support & Administration	\$ 81,848
Evaluation	\$ 50,000
Contingency	<u>\$ 62,792</u>
Total	<u>\$ 700,000</u>

14 Avista has included in this filing the tariff sheets for LIRAP Adjustment Schedules 92 and 192 with increased rates to generate \$350,000 in annual funding. For natural gas service, the funding will come from two sources:

1. The Northwest Industrial Gas Users have agreed that Schedule 146, Transportation Service for Customer-owned Gas,¹¹ would contribute 1% of overall Schedule 146 revenues to LIRAP Schedule 192 starting on October 1, 2015. This level of funding will provide approximately \$25,770 annually.
2. After subtracting the LIRAP contribution generated from Schedule 146, \$324,230 in increased funding is required. Approximately 35% of current LIRAP funding is provided through natural gas Schedule 192. Therefore, Schedule 192 is to be increased by

¹¹ Transportation Service customers taking service under Schedule 146 have not contributed funding to LIRAP since the program began in 2001.

\$113,238 effective October 1, 2015.¹² The recovery of those funds from current Schedule 192 contributors would be on a uniform percentage of margin basis.

3. The remaining funds required for the program will be generated through a rate increase for electric Schedule 92. The annual increase applicable to Schedule 92 is \$210,992. The recovery of those funds from current Schedule 92 contributors would be on a uniform percentage basis.¹³

15 As it relates to the funding of the Senior/Disabled Rate Discount Pilot, the Workgroup agreed that if the expenditures under the Pilot exceeded the \$700,000 budget, the overage would be recovered from all LIRAP contributing customers in a later rate true-up. However, should some pilot funding go unspent by the end of the two-year pilot, those funds would be available first for a possible extension of the rate discount, or second for additional LIRAP Heat grants. Pages 1 and 2 of Attachment C provide the overall level of LIRAP funding increase by fuel, and by schedule.

16 The Workgroup also discussed the overall level of LIRAP funding, and ultimately agreed that this issue is better addressed in Avista's current electric and natural gas general rate case.¹⁴ Therefore, this Petition does not include any request for additional or multi-year funding for general LIRAP purposes.

VII. REQUEST FOR ADDITIONAL TIME TO EXPLORE OTHER PILOT ADDITIONS

17 Beyond the proposed modifications to the existing LIRAP program and the proposed Senior/Disabled Rate Discount Pilot, the Workgroup investigated two other potential additions

¹² Calculation - $34.925\% * \$324,230 = \$113,238$.

¹³ For Schedule 25, the recovery of LIRAP funding applicable to that schedule occurs in the first two volumetric blocks.

¹⁴ Dockets UE-150204 and UG-150205 (consolidated).

to LIRAP: PIPP and AMP. Preliminary research provided by SNAP (in collaboration with Eastern Washington University) on the incidence of poverty in Avista’s service territory indicates a higher number of households living at or below 125 percent of FPL than was recognized previously, with a significant number in the 50 percent or below range.¹⁵

18 A PIPP targets reducing a customer’s energy burden by establishing a payment plan where the customer pays a set percentage of his or her total household income for the energy services. Generally, this ranges from 3-15 percent, depending on whether the customer receives energy service for one or two fuels. New Jersey, for example, requires a 3 percent of income payment for natural gas and 3 percent for electricity, totaling 6 percent overall. Ohio requires a six percent of income payment for gas and electricity separately in dual fuel households, but ten percent if the household is all-electric. In other instances the percent varies by household income.

19 An AMP similarly focuses on the customer’s ability to pay by establishing achievable monthly payments that the customer pays over time to mitigate the hardship a large arrearage may cause. To the extent that these programs encourage customers to pay what they can, they free up funds to assist other customers and reduce the cost of collections, the disconnection/reconnection cycle, and write-offs.

20 The Washington State winter moratorium on heating utility disconnection, RCW 80.28.010(4) codified in WAC 480-100-143(e)(ii), includes both PIPP-like and AMP-like elements. PIPPs and AMPs have met with great success around the country. Ohio has operated the oldest and largest PIPP in the country since 1983. Over time it evolved into a statewide PIPP with an AMP component called “PIPP Plus.” Other statewide PIPPs exist in

¹⁵ “An Estimate of the Number of Households in Poverty Served by Avista Utilities in Washington State,” dated May, 2015. Provided as Attachment D.

Illinois, New Jersey, and Nevada. Various utilities in Colorado, Pennsylvania, New Hampshire and Maine have also implemented a PIPP to help customers afford utilities services. A PIPP is currently under discussion in Oregon.¹⁶ At the same time, Connecticut, Illinois, Maryland, Massachusetts, Nevada, New York, Ohio, Pennsylvania, Ohio, and Rhode Island all have utilities with experience running an AMP. In some cases both PIPP and AMP programs are available; in others only one is employed. Members of the Workgroup are interested in Ohio's model where the combination of the AMP and PIPP further incentivize timely payment behavior. The Workgroup is interested in further investigating these two options because of their potential to keep customers connected to vital services, to reduce energy burden, and to extend energy bill assistance services to more customers. Specifically, the Workgroup saw value in establishing a PIPP for customers at the lowest income levels.

21 However, the Workgroup was not able to investigate these two options thoroughly enough, at this time, to recommend a pilot or pilots. The Workgroup primarily researched the Ohio and New Jersey PIPPs and the Massachusetts AMP, but there are other examples to explore. A number of questions need to be considered more completely, both in terms of decisions about program implementation as well as considerations about customer impact, such as:

PIPP Considerations

- What is an appropriate payment level for a PIPP?
- How should the payment be applied?
- Should the program target a specific income level or levels?
- How should the PIPP address dual fuel homes?
- What are appropriate eligibility requirements?
- Should the PIPP be coupled with an AMP?

¹⁶ The Public Utility Commission of Oregon held a public workshop on March 25, 2015, to discuss Commission Staff's "Low Income Issues Report to the Commission."

AMP Considerations

- What arrearage payment level should an AMP require?
- How much of the arrearage should be retired through participation in an AMP?
- Over what time period should the arrearage retirement occur?
- Can a customer take advantage of the AMP more than once?

Overall Considerations

- If a customer misses a payment or part of a payment, should they lose the option to participate or only some partial benefit?
- Can a customer make up payments and continue on the program?
- What level of funding is needed to serve the target population and how should it be collected?
- What role should the utility have in either of these programs? What role should the Agencies have in either of these programs?
- Is the PIPP and/or AMP compatible with the other LIRAP offerings? Do they enhance program delivery or overall benefit to low-income customers?
- How does the program impact the provision of LIHEAP?
- What adjustments need to be made to either the Company's or the Agencies' customer service systems to accommodate such programs?
- What data needs to be collected to determine the success of the program?

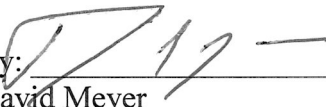
22 The Workgroup recognizes that this may be a partial list of the questions that need to be resolved to properly evaluate the addition of a PIPP and/or AMP LIRAP. At the same time, modifying the existing program and instituting the proposed Senior/Disabled Rate Discount Pilot, if accepted, will require substantial attention for the first year or more. For this reason, the Petitioners propose moving ahead with investigation of these options as part of the ongoing advisory group function. Once the Company and Agencies have achieved a reasonable level of comfort in operating the Senior/Disabled Rate Discount Pilot, the advisory group will take up further in-depth investigation of these two program options, with the intention to file a pilot proposal or status update by January 15, 2017.

VIII. CONCLUSION

23 The purpose of the LIRAP program is to reduce the energy cost burden among those customers least able to pay energy bills and to keep those households connected to service. This program and the partnerships the Company has formed with Agencies have been invaluable to customers who often have nowhere else to go for help while benefitting Avista's overall customer base by assisting to avoid disconnections, bad debt, and other costs borne by ratepayers.

24 In the spirit of collaboration, the Workgroup was able to agree on the modifications as well as design a Senior/Disabled Discount Rate as explained earlier in this petition. We believe these changes all meet the goals the Commission listed in Order 05 of this case. With that, the Petitioners request that the Commission issue an order approving the modifications, additions and associated tariffs related to the Company's Low-Income Rate Assistance Program as provided for in this petition. Due to the time necessary to design and implement the Senior/Disabled Rate Discount Program by the start of the next program year in October, 2015, the Petitioners respectfully request that the Commission issue an order by July 15, 2015.

DATED this 29th day of May, 2015.

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VIII. CONCLUSION

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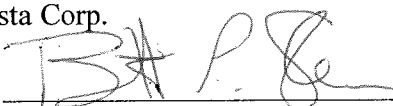
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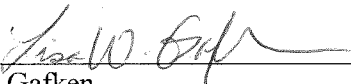
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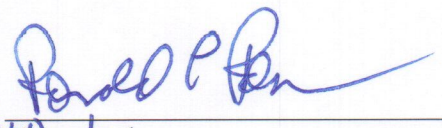
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24 In the spirit of collaboration, the Workgroup was able to agree on the modifications as well as design a Senior/Disabled Discount Rate as explained earlier in this petition. We believe these changes all meet the goals the Commission listed in Order 05 of this case. With that, the Petitioners request that the Commission issue an order approving the modifications, additions and associated tariffs related to the Company's Low-Income Rate Assistance Program as provided for in this petition. Due to the time necessary to design and implement the Senior/Disabled Rate Discount Program by the start of the next program year in October, 2015, the Petitioners respectfully request that the Commission issue an order by July 15, 2015.

DATED this 29th day of May, 2015.

By: _____
David Meyer
Avista Corp.

By: 
Ron Roseman
Energy Project

By: _____
Brett Shearer
Commission Staff

By: _____
Melinda Davison
ICNU

By: _____
Lisa Gafken
Public Counsel

By: _____
Chad Stokes
NWIGU

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By: _____ *on behalf of*
Melinda Davison
ICNU

By: _____
Chad Stokes
NWIGU

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Lisa Gafken
Public Counsel

By:  _____
Chad Stokes
NWIGU

Joint Petition for LIRAP Modifications-Additions
(May 2015)

ATTACHMENT A

Energy Assistance

General Program Overview

General Program Guidelines

Low-Income Home Energy Assistance Program (LIHEAP)

Federal heating and cooling assistance program for low-income households

125% FPL

Avista Low-Income Rate Assistance Program (LIRAP)

Energy assistance program for low-income customer households. Funded by tariff rider

Purpose: Reduce the energy burden among those customers who experience difficulty in paying their energy bill

Intent: Encourage customers to explore ways of becoming self-sufficient

LIRAP HEAT

Replicates LIHEAP

Customer cannot receive both LIHEAP and LIRAP

LIRAP Share Emergency

Emergency Assistance that replicates Project Share, customer cannot receive both but can receive other form of energy assistance.

Maximum payment guideline: \$300

LIRAP Senior Energy Outreach

For seniors on fixed incomes, 60+ years, income at or below 200% FPL when adjusted for non-reimbursed medical expenses (exceptions are available with CARES approval)

Standard benefit of \$300 for heating customers and \$100 for non-heating customers; designed to work in conjunction with Comfort Level Billing

Avista CARES

Intent: To provide energy assistance support to social service agencies that do not have an established energy assistance funding source, and as a resource for CARES referrals

- Hardship
- Recipient must heat with Avista electric or natural gas.
- Available once all other energy assistance resources have been exhausted

Project Share

Established to provide emergency energy assistance to those who have exhausted **ALL** other available energy assistance sources. Fuel-blind.

- Self declaration of income
 - Maximum benefit is \$300
- Agencies vary on the following guidelines
- With/without disconnect notice
 - 1x per calendar year/heating season

Joint Petition for LIRAP Modifications-Additions
(May 2015)

ATTACHMENT B

Avista Energy Assistance Work Group
Day 1 Agenda
9:00 AM – 5:00 PM Spokane, WA

Workshop 1 – Understanding the Existing Program

- I. Facilitation Logistics, Ground Rules, Goals, common language – *Dr. Fein*
 - A. Goals of process: Develop near-term and long-term strategy to meaningfully serve more people, and help customers stay connected? (*Juliana*)
 - B. Common Definitions – *Chuck lead*
 - 1. Program Modifications: adjusting the current structure to be more efficient and effective in reaching customers?
 - 2. Alternate Designs: different ways of determining assistance amount, what form assistance takes and when assistance is provided?
 - 3. Program “administration”, “implementation”, “indirect”, etc. (*SNAP/Avista*)
 - 4. Other?

- II. Background in existing program from various perspectives – *Agencies/Avista (plus)*
 - A. Regulatory (*Juliana*) and Structural Framework
 - B. Alignment with LIHEAP (*Cecil Daniels - Commerce*)
 - C. Eligibility and Certification
 - D. Benefit amount and application to bill
 - E. Outreach and Appointments
 - F. Reporting
 - G. Tracking Systems
 - H. Funding

- III. Barriers – *Dr. Fein lead*
 - A. What might prevent customers from participating?
 - B. What might prevent the agencies from reaching/engaging potential participants?

- IV. Data – *Dr. Fein lead*
 - A. What do we know? (*Agencies/Avista*)
 - 1. Certification data
 - 2. Program reporting metrics
 - B. What do we not know? (*Avista/All*)
 - 1. Disconnection rates, causes and timing
 - 2. Non-participant population size and demographics
 - 3. Market segmentation
 - C. How could Compass help with data gaps? What can Compass do? (*Avista*)
 - D. How can outreach and/or targeting be used to improve response?
 - E. What data is necessary for this process to move forward? What data is necessary for long-term improvements?

- V. Next steps – Research that needs to be done between first and second workshops – *Dr. Fein lead*

**Avista LIRAP Workshop #1 Minutes
Held Friday, January 30, 2015
Huetter Mansion, Gonzaga University Spokane Washington**

Facilitated by: Dr. Al Fein, Gonzaga University

Present:

SNAP: Julie Honekamp, Carol Weltz, Lucy Lepinski, and Brandy Marsh

Energy Project: Chuck Eberdt and Michael Karp

Rural Resource: Dena Battin

Avista: Linda Gervais, Pat Ehrbar, Chris Drake, Wendy Manskey, and Ana Matthews

Public Counsel: Lea Fisher

Department of Commerce: Cecil Daniels

UTC: Juliana Williams

Participating by telephone:

Public Counsel: Lisa Gafken

UTC: Roger Kouchi

NWIGU (Northwest Industrial Gas Users): Edward Finklea

1. The meeting opened with introductions and discussion around general ground rules. Al distributed a document titled: Proposed Group Agreements. The following additions were recommended and agreed upon by the group:
 9. Ask for clarification, when you don't understand.
 10. Be thoughtful of individuals on the phone by stating your name before making comment, and identifying documents that are being discussed.

The participants unanimously agreed that the Proposed Group Agreements would be the Group Agreements for the ground rules for future workshops as well. Additionally, it was agreed that sufficient consensus would be the standard of group agreement for workshop activity but that each party would be represented by their organization for the filing. The Voting Representatives for each organization are as follows:

Linda Gervais-Avista
Lea Fisher-Public Counsel
Juliana Williams-Staff
Ed Finklea-NIWGU
Chuck Eberdt-Energy Project
Julie Honekamp-SNAP
Dena Battin-Rural Resources
Cecil Daniels-Department of Commerce

Cecil will decide at the time of each vote whether or not to vote or abstain. A consensus will constitute 6 of 8 votes or 5 of 7 votes, according to the total number of votes.

2. Juliana Williams provided an overview of the Program and Workshop Goals, as detailed:

- I. Program Goals
 - a. Keep customers connected
 - b. Look to serve more customers
 - c. Lowering energy burden for participants in LIRAP
 - d. Identifying the appropriate data to assess program effectiveness

- II. Workshop Goals
 - a. Filing dates
 - June 1, 2015 – consensus filing on modifications and additions
 - July 1, 2015 – non-consensus filing
 - b. Proposal for long term funding protocol (inform funding decisions)

Comments:

- The program design should include a methodology for funding
- A annual “true-up” method should be assessed
- It is important to recognize that consensus may not be able to be achieved with other stakeholders who are not participating in the workshops
- A future regulatory process should be determined
- A definition of Energy Burden should be established, and include consideration of all customers, not just low-income.

3. Chuck Eberdt provided an overview of definitions, as follows:

- Modifications are small change, near term, might not require tariff filing with the Commission
- Additions are new structures, alternative design and would need tariff revisions, and would implement originally in the form of a pilot
- Energy Burden is the percentage of household income that is used to pay the energy bill; the average for WA is 3% and for low-income, program participants it can be as high as 30%.
- Julie shared three broad headings for expenditures
 - i. Administrative Costs include HR, accounting, leadership and information systems
 - ii. Program Support Costs include staffing, resources needed to serve clients
 - iii. Direct Benefits are the participant benefit (grant and materials)

Comment:

- Commerce has federal definitions that could be used for LIRAP.

4. The following comments were provided as perspectives of the program:

- Julie Honekamp shared that SNAP programs are designed to help low-income that are struggling with their energy bills.
- Juliana identified that the regulatory context is that it is fair, just and reasonable and sufficient - clarified that utilities may provide an exemption for different rates for low-income customers.
- Linda Gervais reviewed the LIHEAP Clearinghouse “History Article”

5. Carol Weltz presented a comprehensive overview of LIRAP

Carol identified that planning is a challenge for agencies due to the timing of LIHEAP awards and LIRAP annual estimate sheet and monthly vouchers.

The group discussed that LIRAP is a year around program and LIHEAP recently extended the contract year to 18 months both of these structures benefit the agencies in having funding available at the beginning of the heating season. It was identified that the original LIRAP 20% of direct service amount carryover fits with LIHEAP concept. The challenge is the unpredictability with LIHEAP funding.

Comment:

- More discussion should occur regarding the funding ramifications for agency planning.

Action Items:

- samples of the LIRAP monthly vouchers that are provided to the agencies (Ana)
- chart that lays out LIRAP revenues, LIHEAP allocations, and expenditures, separated by gas and electric for a program year, broken down by month (Ana and Cecil to collaborate)
- timeline of the cash flows that lays out LIRAP and LIHEAP allocation information distribution (Ana and Cecil to collaborate)
- LIHEAP average annual benefit and agency awards. The intent is to identify if the implementation of a discounted rate had an effect on agency awards - specifically Snohomish County, and all agencies that administer PacifiCorp's program. (Cecil, Juliana and Chuck to collaborate)
- Detailed chart of disconnects in relation to receipt of energy assistance, along with identification of disconnects by agency service area (Ana and Linda to collaborate)
- **Please provide all Action Items to Wendy by February 10, 2015 11am.**

6. Brandy Marsh provided an overview of SNAP's reporting capabilities. SNAP reporting abilities now include the ability to track if a customer has ever been disconnected.

Cecil Daniels shared that the LIHEAP database includes LIRAP data as provided by the agencies. The agencies use the LIHEAP database to determine benefit amount, and store demographic data that is used for LIRAP reporting. Additionally, with the new LIHEAP Performance Measures energy burden can now be reported by all agencies.

Comment:

- We don't know if the benefit is really enough or too much to help the customer. The workshop should assess the amount of funding by determining how much funding per customer, per month is needed as identified by the Community Action Agencies' funding per customer per month. Additionally, acceptable rates of incremental increases should be determined along with consideration for the agencies' ability to implement the increases.

- It is challenging to conduct analysis whether energy assistance has helped to reduce write-offs.
 - Keeping customers connected helps all customers paying for the fixed costs to serve them.
7. Carol Weltz presented a comprehensive listing of the barriers customers may encounter that keep them from participating, along with listing of obstacles to agencies in reaching and engaging the eligible population as identified by SNAP. Lucy Lepinski read a list that was generated by SNAP regarding outreach and targeting activity that could be implemented to improve participation.

Comment:

- A consideration is the ability to move individuals from awareness to action
 - Education is a critical element for the program effectiveness
 - It is unknown how many customers are turned away because there isn't any funding.
8. Upcoming Workshop Schedule
February 13 - Seattle
March 17 - Spokane
March 31 – Possibly Seattle
April 16 - Spokane
Hold: May 1 and May 8 for possible meetings in Spokane if needed.

Workshop #2 will be held on February 13, 2015 at:

**Attorney General's Office
Public Counsel
800 5th Avenue, Suite 2000
Seattle, WA**

Please provide any hand outs to be distributed to the group, to Wendy no later than February 10, 2015 at 11am. This will allow for the agreed upon 48-hour window for group materials distribution. Please contact Wendy if you have any questions at 509-495-4564 or wendy.manskey@avistacorp.com.

Avista Energy Assistance Workgroup
– Workshop 2 - Modifications to the Existing Program –

Office of the Public Counsel, 800 5th Ave, Suite 2000
February 13, 2015

9:00 Check in.
Group Agreements
Voting Agreement Clarification

9:15 Approve minutes from last meeting

Program Goals

1. Keep customers connected.
2. Serve more customers.
3. Lower LIRAP participants' energy burdens.
4. Identify appropriate date to assess program effectiveness.

“Homework”

Sample LIRAP monthly voucher to agencies (Ana)

Chart of LIRAP revenues, LIHEAP allocations, and expenditures by month, separated for fuel type (Ana and Cecil)

Timeline of LIRAP and LIHEAP allocation cash flow (Ana and Cecil)

Impact of rate discounts on agency average LIHEAP annual benefit and overall allocation; e.g., PacifiCorp agencies and Snohomish (Cecil, Juliana, and Chuck)

Detailed chart of disconnects in relation to receipt of energy assistance and disconnects by agency service area (Ana and Linda)

9:30 How can the existing structure be modified to achieve the defined program goals?

- i. Funding Structure (timing, certainty, etc., independent of amount)
- ii. Alignment with LIHEAP
- iii. Timing of assistance relative to need

10:30 BREAK

10:45 Continue discussion

- iv. Eligibility: required criteria, duration
- v. Certification process
- vi. Outreach

12:00 LUNCH

1:00 Continue discussion

- vii. Appointment Scheduling
- viii. Reporting requirements
- ix. Role of utility, agencies
- x. Other?

Avista Energy Assistance Workgroup
– Workshop 2 - Modifications to the Existing Program –

Office of the Public Counsel, 800 5th Ave, Suite 2000
February 13, 2015

- 2:20 BREAK
- 2:30 Revisit funding implications of modifications discussed: need for additional funding and impact on other ratepayers.
- 4:00 Next Steps – Modeling effects of certain modifications (to be determined by group)
- 4:15 Revisit Group Agreements
Appreciations and Requests
- 4:30 Adjourn

Avista LIRAP Workshop #2 Minutes
Held Friday, February 13, 2015
Office of the Public Counsel, 800 5th Ave, Suite 2000

Facilitated by: Dr. Al Fein, Gonzaga University

Present:

SNAP: Julie Honekamp, Carol Weltz,

Energy Project: Chuck Eberdt, Shawn Collins and Michael Karp

Rural Resource: Dena Battin

Avista: Linda Gervais, Chris Drake, Wendy Manskey, Ryan Finesilver, and Ana Matthews

Public Counsel: Lisa Gafken, Stephanie Johnson joined in the afternoon

Department of Commerce: Cecil Daniels

UTC: Juliana Williams, Roger Kouchi

NWIGU (Northwest Industrial Gas Users): Edward Finklea

Participating by telephone:

SNAP: Lucy Lepinski

Department of Commerce: Tony Hanson

1. The meeting opened with a discussion about the Group Agreements. The following additions were recommended and agreed upon by the group:
 13. All materials for the meeting should be distributed to the group, when possible, at least 48 hours before the scheduled workshop.
 14. When referring to items written up on the wall, please take a picture and send to the people participating by phone so that they may follow the discussion.
2. The group voted to approve Workshop #1 minutes with two changes.
 - A. Voting Clarification: The Voting Representatives for each organization are as follows:

Linda Gervais-Avista
Lea Fisher-Public Counsel
Juliana Williams-Staff
Ed Finklea-NIWGU
Chuck Eberdt-Energy Project
Julie Honekamp-SNAP
Dena Battin-Rural Resources
Cecil Daniels-Department of Commerce

Cecil will decide at the time of each vote whether to vote or abstain. A consensus will constitute 6 of 8 votes, or 5 of 7 votes, according to the total number of votes.

Julie shared there are three broad headings for expenditures

- i. Administrative Costs include HR, accounting, leadership and information systems
- ii. Program Support Costs include staffing, resources needed to serve clients
- iii. Direct Benefits are the participant benefit (grant and materials)

Corrections to the minutes will be made and redistributed.

Program Goals

1. Keep customers connected.
2. Serve more customers.
3. Lower LIRAP participants' energy burdens.
4. Identify appropriate data to assess program effectiveness.

"Completed Homework"

Sample LIRAP monthly voucher to agencies (Ana)

Chart of LIRAP revenues, LIHEAP allocations, and expenditures by month, separated for fuel type (Ana and Cecil)

Timeline of LIRAP and LIHEAP allocation cash flow (Ana and Cecil)

Impact of rate discounts on agency average LIHEAP annual benefit and overall allocation; e.g., PacifiCorp agencies and Snohomish (Cecil, Juliana, and Chuck)

Detailed chart of disconnects in relation to receipt of energy assistance and disconnects by agency service area (Ana and Linda)

Al Fein asked about the impact of the Avista's General Rate Case on the outcome of the LIRAP workshops.

Linda Gervais explained that the LIRAP Workshops are the result of an order from the previous rate case. Juliana Williams added the only way the General Rate Case might affect LIRAP is if we decide to consolidate the filing with the current General Rate Case.

How can the existing structure be modified to achieve the defined program goals, was the general topic for the day.

1. Carol Weltz went through the LIRAP Design handout and reviewed some historical information regarding LIRAP. Agencies are sent vouchers reporting actual income from the previous month.
2. Carol Weltz clarified that LIHEAP funding usually becomes available sometime between October and December, with a spending limit. It has had a zero percent spending limit the past few years. Historically the contract period was the same as LIRAP and no carryover of funds were allowed, but LIHEAP has now adopted an 18 month contract that does allow agencies to carry money into the next heating season. All unused money is returned to Department of Commerce.

Comments

- Tony Hanson explained that Commerce tells the agencies the Hold Harmless amount, although they cannot let the agencies spend until they know they have the money from the Federal Government.

A. Carol Weltz presented modifications that would help the agencies reach the program goals. A budget is the main objective for structure and timing. Staffing and number of appointments would be better determined.

Comments

- Estimates for Revenues are based on the Test Year

B. Ryan Finesilver provided an overview of the Monthly LIRAP Vouchers that Avista sends to the agencies. Included in his overview were details on monthly activity, balances and timeline for reporting.

Comments

- Julie Honekamp explained that it is difficult because they don't know the revenues and can't budget or provide staffing as effectively.
- Dena Battin shared that in the past she has spent money she did not have, but knew it would come back. This approach worked because she later got money back from LIRAP and other agencies to make up the deficit.
- Julie Honekamp suggested front loading LIRAP. For example in the Spring can you say, "You have x amount of money to spend no matter the temperature."

C. Linda Gervais reviewed the handout LIRAP Analysis. She explained that the agreed upon amount is set and then Avista creates a rate design to come up with the funding. The handout shows revenues collected from schedule 92 (Electric) and 192 (Gas) to fund LIRAP.

Comments

- Michael Karp asked the relationship of Administrative Costs to Direct Service Costs. "How do agencies budget when all the Administrative Costs are spent and the Direct Services are not?"
- Chuck Eberdt shared that the agencies understand the budget differently. The agencies believe they are getting more or less based on weather.

D. Carol Weltz continued with the hand out, historically LIRAP Heat has mimicked LIHEAP as a "heating" program. Intent was to serve more households by not duplicating and making dollars go further.

Comments

- Juliana Williams suggested that if LIRAP was an energy program, a modification could be spreading the grant across a year like Comfort Level Billing. This could be an option in the design and make it voluntary.
- Chuck Eberdt pointed out that an incentive for spreading the grant out could possibly be a higher percentage of money, which would encourage people to take this option.
- Juliana Williams recommended non-monetary incentives as another avenue.
- Roger Kouchi clarified that spreading the payment out fits well into regulatory requirements.
- Linda Gervais shared two ideas, increasing the grant amount for choosing the spread out option and not being eligible for another one until the next year, if the arrangement was broken.
- A possible modification would be to change the way LIRAP dollars are allocated to communities beyond meter count.
- Cecil Daniels explained that too many changes in the project will result in the Commerce Database not working for LIRAP needs. Possible need to modify or create new reporting system for LIRAP.
- Chris Drake clarified that meter count was by design when creating LIRAP program, but Avista is open to changes
- Michael Karp suggested priority of service go to seniors and children under 5.

E. Carol Weltz continued with possible modifications regarding the timing of LIRAP.

Continue to serve LIRAP Heat after June 30th and market LIRAP as an energy assistance program and engage clients at a different time of the year.

Tony explained that the LIHEAP benefit is based on a percentage. It will be the same calculation no matter when they come in, but LIHEAP cannot be distributed in the summer.

Comments

- Linda Gervais pointed out the need for clarification around rules and regulations applying to a grant for a customer account that is in jeopardy of disconnect and then gets disconnected. In Washington it goes into Prior Obligation.
- Dena Battin suggested using LIRAP to avoid shut off in summer months.
- Linda Gervais clarified a data need for how many low income customers carry a balance into summer.

7. Carol Weltz suggested some modifications in eligibility and required criteria that would make it easier for the agencies to qualify clients.
 - i. Categorical eligibility, i.e. Food stamps, Social Security, Disability, Aging and Long Term Care.

- ii. A two year certification, for the categorically eligible groups.
- iii. Increase LIRAP to 150% of Federal Poverty Level (FPL).
- iv. Modify the program to provide larger grants to households at 0-50% FPL
- v. Giving top priority to the highest energy burden households

Comments

- Cecil Daniels explained Heat to Eat. Clients get a bump in their food stamps if they qualify and get LIHEAP minimum benefit of \$20. The impact to the agencies' LIHEAP budget has been significant.
- Juliana Williams suggested that people who have signed up before could have an advantage to sign up early. Do the agencies keep a list and use it to fill in when they have open appointments.
- Dena Battin shared that she keeps a list of people she did not serve. That way she can check in with them and see if they qualify.

F. Carol Wertz continued with the LIRAP Design handout. Certification is another area for modification.

Comments

- Juliana Williams suggested linking databases so that some of the potential client's information would automatically populate. Could clients upload their own information to the agencies for an intake? An electronic documentation option for certification.

G. Possible modifications for Outreach could be identifying minority leaders in the communities to outreach, SNAP expanding hours of operation, and to retain a poverty expert to help with marketing and communication.

Comment

- Linda Gervais clarified that SNAP has the highest outreach in the country.

H. Scheduling modifications could include on-line applications.

Comments

- Dena Battin prioritizes appointments by level of poverty, and households with Seniors or children under five.
- Michael Karp suggested group intakes for discussion purposes.
- Juliana Williams explained that a concern for the Commissioners is that first come first served is not necessarily fair. What other options are there?

- Michael Karp how can we lower the no show rate issue?
- Julie Honekamp said SNAP uses texting and calls to confirm appointments.
- Linda Gervais shared that Avista knows that 75% of our customers pay off their bill when they get the past due bill.
- Ana Matthews clarified that with Compass, Avista does not currently have the capability to text customers for the agencies to remind them of their appointments, etc.

I. Reporting requirements

Comments

- Dena Battin suggested having reports that will stay in the system instead of having to pull a lot of information and manipulating it each time.
- Cecil Daniels let the group know that Commerce is in flux.
- Carol Weltz recommended LIRAP include more funding to support the creation of additional reporting fields and agencies ability to collect longitudinal data and staff outcome analysis.
- Juliana Williams let the group know that there might be a small amount of funding available from the Commission to support research activities.
- Chuck Eberdt clarified that we want more information from other Utilities.
- Lucy Lepinski shared that if the program is modified, the SNAP database would need time to change.
- Juliana Williams suggested short term changes and long term changes.
- Linda Gervais clarified that whatever modifications are chosen, we must know what it means to the utility, the agencies and clients. How much does the cost of the program change long term? Modifications must be prudent.
- Julie Honekamp requested a model of the decisions before the final LIRAP outcome is reached.

There was a voting consensus reached on the following modifications. The group agreed that these are necessary modifications. Avista agreed to research regarding cost and time.

- a. Fixed annual Budget (not an estimate)
- b. Earlier commitment of budget
- c. Explore a true up mechanism
- d. Allow agencies to spend more of their budget than is collected by Avista month to month.

The group will research how expensive or effective it would be to do the following modifications. If at all possible they will provide the information at the next meeting and if not, then the following meeting.

- A. Level billing-including grant and different incentives for choosing this option. Year around- program-dual peak. –Juliana Williams and Chuck Ebert
 - B. Allocation beyond meter count-Ana Matthews
 - C. Serve LIRAP Heat after 6/30-Carol Weltz and Commerce
 - D. Categorically eligible-i.e. Food Stamps-Carol Weltz
 - E. 2 year income verification-Carol Weltz
 - F. Self-Certification-Carol Weltz
 - G. Increase LIRAP to 150% of Federal Poverty Level and Larger Grants 0-50% Federal Poverty Level- Julie Honekamp
 - H. Prioritize by highest Energy Burden and other things-Dena Battin and Juliana Williams
 - I. Apply on-line-Lisa Gafken, Sara J. Public Counsel
 - J. Appointment Schedule Options and No show rates-Juliana Williams
 - K. Text Ability-Use technology to its fullest-Chuck Ebert, Lisa Gafken
 - L. More Funding for Studies-Juliana and SNAP
 - M. Additional reporting capabilities-Cecil Daniels
 - N. More funding for data analysis-Document Data Needs-Julie Honekamp and Michael Karp
 - O. Low Income Exempt from Schedule 92 and 192-Pat Ehrbar
-
- J. Upcoming Workshop Schedule
 - March 17 - Spokane
 - March 31 – Possibly Seattle
 - April 16- Spokane
 - Hold: May 1 and May 8 for possible meetings in Spokane if needed.

Workshop #3 will be held on March 17, 2015 at:

**SNAP
3102 W. Fort George Wright Drive
Spokane, WA 99224**

Please provide any hand outs to be distributed to the group, to Wendy no later than March 11, 2015 at 11am. This will allow for the agreed upon 48-hour window for group materials distribution. Please contact Wendy if you have any questions at 509-495-4564 or wendy.manskey@avistacorp.com.

Avista EAP Work Group
Workshop 3 – Alternate Program Design Elements
3102 W. Fort George Wright Dr, Spokane, WA

Dialing in? Use 559-726-1000; access code when prompted: 120527#

- 9:00 Revisit introductions, ground rules, review agenda - *Al*
- 9:15 Broad Overview of Basic Design Alternatives – see handout, additions, simple clarifying questions - *Chuck*
- 9:45 The Deeper Dive into Specific Alternatives considering: advantages, disadvantages, what form assistance should take, what amount is appropriate, how the amount is determined, the timing and frequency of program participation
- OPTION 1: RATE DISCOUNT – *Juliana*
- 10:30 OPTION 2: BILL CREDIT/GRANT - *Dena*
- 10:45 BREAK
- 11:00 OPTION 3: PERCENT OF INCOME PAYMENT PLAN - *Ana*
- 11:30 OPTION 4: PERCENT OF BILL PLAN - *TBD*
- 12:00 LUNCH (some folks have to go off site)
- 1:00 OPTION 5: ARREARAGE MANAGEMENT - *Lea*
- 1:30 OPTION 6: OTHER (Targeted Burden, Resources Available, other models?) - *Michael*
- 2:00 SUMMATION - *Al*
- 2:30 BREAK
- 2:45 Data Needs Discussion
1. Homework from last meeting related to needed data.
 2. Can we identify data that we need? What can we readily gather?
 3. Can we begin modeling any programs? If so, which?

From the end of the last meeting minutes:

The group will research how expensive or effective it would be to do the following modifications. If at all possible they will provide the information at the next meeting and if not, then the following meeting.

- A. Level billing-including grant and different incentives for choosing this option. Year around- program-dual peak. –Juliana Williams and Chuck Ebert
- B. Allocation beyond meter count-Ana Matthews
- C. Serve LIRAP Heat after 6/30-Carol Weltz and Commerce
- D. Categorically eligible-i.e. Food Stamps-Carol Weltz
- E. 2 year income verification-Carol Weltz
- F. Self-Certification-Carol Weltz
- G. Increase LIRAP to 150% of Federal Poverty Level and Larger Grants 0-50% Federal Poverty Level- Julie Honekamp
- H. Prioritize by highest Energy Burden and other things-Dena Battin and Juliana Williams
- I. Apply on-line-Lisa Gafken, Sara J. Public Counsel
- J. Appointment Schedule Options and No show rates-Juliana Williams
- K. Text Ability-Use technology to its fullest-Chuck Ebert, Lisa Gafken
- L. More Funding for Studies-Juliana and SNAP
- M. Additional reporting capabilities-Cecil Daniels
- N. More funding for data analysis-Document Data Needs-Julie Honekamp and Michael Karp
- O. Low Income Exempt from Schedule 92 and 192-Pat Ehrbar

Avista LIRAP Workshop #3 Minutes
Held Tuesday, March 17, 2015
SNAP, 3102 West Fort George Wright Drive

Facilitated by: Dr. Al Fein, Gonzaga University

Present:

SNAP: Julie Honekamp, Carol Weltz, Lucy Lepinski

Energy Project: Chuck Eberdt, Shawn Collins and Michael Karp

Rural Resource: Dena Battin

Avista: Patrick Ehrbar, Chris Drake, Wendy Manskey, Ryan Finesilver, and Ana Matthews

UTC: Juliana Williams

Participating by telephone:

UTC: Roger Kouchi

Department of Commerce: Cecil Daniels

Public Counsel: Lea Fisher and Lisa Gafken

1. The meeting opened with introductions and a reading of the Group Agreements
2. The group voted to approve Workshop #2 minutes with two changes.
 - a. On page 5, Michael Karp suggested group intakes and the words “for discussion purposes” will be added.
 - b. Juliana Williams asked for the items on the parking lot to be added to the minutes.
 - i. Parking Lot Items:**
 1. LIRAP Energy versus heat
 2. Multi-year funding amount
 3. Larger grants for 0-50% Federal Poverty Level
 4. No show rate
3. Chuck Eberdt began with the handout, Bill Assistance Program Designs, and explained the focus of the meeting would be a broad overview of basic design alternatives. Features of a program may work for other programs and not necessarily the way the particular program is written.
 - A. Juliana Williams presented the Straight Rate Discount which is a set across-the-board percentage reduction in the monthly bill, and given to any qualified customer.

Comments

- Pat Ehrbar asked for clarification. Is it a Rate Discount or a Bill Discount?
- Chuck Eberdt explained that Pat’s question gets into the core of the debate about the statute itself. The statute says discounts in rates versus usage based focus.
- Al Fein asked if there is an advantage to either method.

- Juliana Williams explained that it depends. The bill will be lower, but the difference is in the implementation.
- B. Juliana Williams continued with the Income-Based Straight Rate Discount. Based on Income levels customers would get a certain type of discount on their rate or their bill. This is often set up in tiers so that lower income customers would get more of a discount.
- C. Juliana Williams presented the Usage-Based Rate Discount. It is a discount that applies to certain blocks of usage. The customer receives the bill reduction through a reduced charge or applied credit per kWh used. This is clearly a discount rate design. This would not apply a discount to the basic charge.

Comments

- Lea Fisher asked how the discounted rate helps low income users?
 - Chuck Eberdt explained the level of the discount the customer receives will be delivered by and is going to vary based on their consumption. In PacifiCorp's program they tried to focus more on levels of poverty rather than levels of usage, but it does address usage.
- D. Chuck Eberdt described the Marginal Cost-Based Rate. The rate the customer pays is structured to recover the variable (commodity) costs plus some contribution to the fixed cost of the system.

Comments

- Pat Ehrbar clarified that most of the talk has been around the Electric side, but the Gas side must be considered. The margin component of the rate as a chunk, the marginal costs, the gas cost rate of it, is the bigger chunk. So if you did a marginal rate with the gas cost in there, you would actually be worse off than if it went to the discount rate which could actually eat into gas cost. On the Electric side it might be appealing because there is a three cent variable rate for energy, but on the gas side we would be talking about \$.50 to \$.60 per Therm right off the bat for the marginal cost. It would not be very beneficial on the Gas side.
 - Juliana Williams suggested that some of the program designs on the handout are not necessarily endorsements, but for context of what has been done.
 - Michael Karp expressed that the concepts are important overall to other rate payers benefiting from low income people not being kicked off the system with disconnects because of fixed costs and even contributing something to it. This helps in keeping people connected.
- E. Chuck Eberdt continued with #6 on the handout, Available Resource Discount. He shared that this one did not work because what was supposed to happen is the expenses,

the customer had, for instance rent, medical, child care, etc. would be subtracted from the income. Once a reasonable amount for those necessities was subtracted from income, the left over portion was the “Available Resource”. So the bill would be based on or the discount would come from what is available after the other expenses are subtracted from the income. It was abandoned because arguments arose from deciding what was allowable.

Comments

- Chuck Eberdt commented there was a “Big Brother” element to #6 that made it uncomfortable to impose on customers.
- Al Fein suggested that the group should strike this one.
- Juliana Williams shared her vision of allowing the group to choose what they were interested in and the ones no one was interested in would fall away without requiring a formal vote.

F. Juliana Williams asked for some open discussion concerning specifics, if a discounted rate would be pursued, what is the basis for determining the size of the discount? What would be an appropriate way of determining discount blocks? Usage levels? For what part of the population does a discounted rate make sense? Who? How much and what part of the bill?

Comments

- Juliana Williams suggested that a Straight Rate Discount does not meet our goals, and does not address the diversity of people’s financial situations. The Marginal-Cost Base rate, and the Available Resource Discount Base rate, may be a little problematic, although there may be some benefit to all rate payers to recover some of the fixed costs/system costs. Depending on design, an Income-Based Straight or Usage-Based Rate Discount could be very useful. The question remains, would this be more useful than a grant? Some groups that this may help are Seniors and those on fixed incomes.
- Lucy Lipinski reminded the group of 3 of our goals for these workshops, 1) Keep customers connected 2) Look to serve more customers 3) Lowering energy burden for participants in LIRAP
- Patrick Ehrbar clarified that something that is not on the list of Goals is contribution towards the fixed cost of the Company. So the Marginal-Cost Base rate method would be problematic on the Gas side. After working through some scenarios, to make the discount meaningful on the Gas side, and get the percentages of funding, the bill/grant and getting them equal on the electric and gas side, it would go deeply negative on a margin stand point on the Gas side. It actually starts eating into the commodity cost itself. On the Gas side, no margin can be preserved unless it gives a small discount disproportionate to the Electric side. So if we try to keep those somewhat equal to eat up the same bucket of money, using \$500,000 from Juliana’s testimony, for example \$.34 to \$.48 range depending on income tiers and our Gas

cost in rates is \$.53 to \$.58, plus or minus, so while trying to preserve margin while having customers contribute toward the fix costs of the company and even modify the basic charge. It is lost on the Gas side.

- Michael Karp reminded the group about non-duplication of services because of LIHEAP.
- Chuck Eberdt explained the program could serve more households even though there is a duplication of service, but there are other things that play into that choice and that is the administration of the program and the cost of the administration of the program.
- Carol Wertz suggested Seniors as a great place for a discount. A lot of times Seniors don't want to use money that is taken away from someone else. They don't want to apply for welfare, a lot of preconceived notions that keeps Seniors from getting help from LIRAP. Anyone would take a discount, whether a coupon or some discount for that population would work. The word "grant" seems to be a trigger. What is better to consider usage based or income based? Right now the way LIRAP works is they get \$100 credit if they are a non-heating customer and a \$300 credit if they are a heating customer. Unknown as to usage, counted by bill amount. Data is currently not collected on usage for this group.
- Patrick Ehrbar asked how seniors would qualify for a rate over a grant.
- Carol Wertz shared that Seniors never come in the door, they qualify on the telephone. They are contacted and qualified by income and it is a fairly simple process. Maybe in this design scenario, we could also qualify Seniors if they were categorically eligible for instance SSI for two years and they would qualify for the discount for two years and then re-qualify every couple years.
- Dena Battin shared that the discount percentage might be more effective because it would take into consideration the amount of usage. It would be more helpful than the current system because people who are in apartments use very little energy and people in their homes, use more.
- Lucy Lepinski added that different programs where we could serve more people, could negatively impact the other goal of keeping people connected. If we do not provide them assistance in a meaningful way that gets their bill down to a reasonable amount of their income they are still going to get disconnected. 80 percent of LIRAP recipients are renters and they cannot really impact the energy efficiency of the home.
- Michael Karp questioned if a cap was possible on a discounted rate due to discriminatory implications and asked for Juliana Williams' feedback.
- Juliana Williams shared that we want to take a look at the size of the population and some sub-populations such as Seniors, people on limited incomes, and households with children. If we are looking at a program that would just apply to folks on a fixed income that would be a smaller proportion than the total eligible population. So a design could look at the total eligible population and the expected participation to figure out an estimated budget for the program for the year and whether or not a cap was needed. The Commission is interested in pilots and they are interested in

trying new things, but want to see what the experience is before making something permanent.

- Lucy Lepinski commented that when looking at the fixed income eligibility, they may not have energy burden because of their housing situation. Energy Burden should be considered at well.
- Juliana Williams described the amount of discount that customer might receive. In the previous rate case she suggested that the LIRAP and LIHEAP amounts to be very close to being the same. What part of the bill or what part of the year would be appropriate for a discount?
- Chris Drake suggested we consider how rate discounts might interact with LIHEAP state allocations.
- Carol Wertz shared a discount could change allocations of LIHEAP depending when usage is pulled. If the discount is applied before the usage is pulled it would reduce the LIHEAP amount. LIHEAP is based on three years of experience of grant amounts, poverty levels and other factors.
- Patrick Ehrbar added that a discount rate would not affect LIHEAP for the Senior discounted rate unless they fit income profile, they are not on LIRAP.
- Michael Karp asked where the group is on Energy program versus Heating program?

The Group conducted a straw poll to see where preferences lie on an Energy Program versus a Heating program.

Energy Program-Patrick Ehrbar, Chris Drake, Dena Battin, Ana Matthews, Lucy Lepinski, Julie Honekamp, Michael Karp, Lea Fisher, Lisa Gafken
Heating Program-Ana Matthews, Lea Fisher, Lisa Gafken
Year Round Program-Juliana Williams, Patrick Ehrbar, Chris Drake, Dena Battin, Ana Matthews, Chuck Eberdt, Lucy Lepinski, Julie Honekamp Michael Karp, Roger Kouchi
Pass-Ryan Finesilver, Carol Wertz, Shawn Collins, Cecil Daniels

Comments

- Juliana Williams questioned is it appropriate to expand service for those sub populations without expanding the service to the standard LIHEAP eligible population.
- Lea Fisher would like the discount to be available to all customers and not just sub groups.
- Shawn Collins asked if we are not going to meet the needs of all eligible households then how will we prioritize whose needs we meet?
- Patrick Ehrbar believes we should keep LIHEAP unchanged or higher within the new program parameters.
- Chuck Eberdt explained targeting and sub populations are just other ways of focusing outreach.

4. Dena Battin went over the handout, Fixed Credit. The handout addresses the process we are using at this time.

Comments

- Juliana Williams it is a finite amount but there are other ways of looking at credits to bills. A credit and a rate discount could be blended.
- Carol Weltz shared other options such as metering the credit out over six months or twelve months. There are also other ways of applying a fixed credit than the way we are doing it now.
- Chuck Eberdt asked what the reaction would be from customers if the grant was metered out over twelve months.
- Carol Weltz and Dena Battin suggested volunteers for spreading the grant over six to twelve months.
- Chuck Eberdt questioned how often LIRAP is used for a large arrearage and that this is a data point we need.
- Ana Matthews shared that the agencies would put the monthly payments on the report because the utility does not have a back office fix.
- Lucy Lepinski suggested that spreading the grant out over time may eliminate arrearages.
- Chris Drake clarified that a separate rate schedule would be very low administrative costs.

G. Ana Matthews presented option #7 on the hand out, Bill Assistance Program Designs. Percentage of Income Payment Plans (PIPP)-under this model, the customer's bill payment is set at a predetermined percentage of their annual income, generally in the range of 4%-6%, though it can be higher for all electric households. The following are three ways the customer can be billed.

1. Straight PIPP-The customer simply pays a set percent of income each month, so long as an annual bill is expected to exceed the set percent of the household income.
2. Fixed Credit PIPP-Amount based on their income, etc. one time per calendar year.
3. Percent of Bill PIPP-the customer's percent of income is used to establish what percent of the annual bill, the customer is responsible. They will pay that percent of the monthly bill based on usage.

Comments

- Patrick Ehrbar explained this could also be a modification to the current program. Do LIHEAP first and get the initial bill lump sum down, then look at their energy burden, if they still need more relief apply LIRAP.
- Chris Drake maybe a 4th model under the PIPP, but it would be a modification. If LIHEAP only gets them 6% energy burden then LIRAP would come in and get them to a 4% or whatever the goal is.

- Chuck Eberdt explained if the energy burden is set and that is the target we use, however we get to that target, we get there. Should we pilot this?
- Michael Karp shared that lowering the energy burden my not keep people connected.
- Lucy Lepinski stated that we would still need an emergency program, but believes we would have more people stay connected.

H. Lea Fisher continued with Arrearage Management, this program provides a process for a customer who has built up unpaid bills to pay down the debt over an extended period, often with an incentive to reward steady, timely payment. Each time the customer makes a timely payment their arrearage is reduced until completely eliminated. One of the key pieces is to develop the new utility charges that customer will pay, estimated by usage under a low income discount rate or low income bill assistance. This program is not developed using the standard residential rate. The company estimates what the bill will be over a 12 month period, and then divide it by 12 so the customer is asked to pay the same level amount each month. In design, a threshold arrears amount will help set eligibility, and if the customer is on the plan there are no threatened disconnections or other collection efforts.

Comments

- Lea Fisher pointed out some benefits of this program, it helps customers stay connected, improves the relationship between the utility and the customer, and it reduces collection, termination and uncollectable debt. The utility will actually recover a larger percentage of amounts billed from people that are in these energy arrearage programs than if they were not in the program.
- Juliana Williams asked what approaches are used to determine the amount of arrearage to be reduced or forgiven. What determines the benefit the customer receives in terms of reduction to their bill?
- Chuck Eberdt stated that it depends upon how long the Company allows the customer to pay down the arrearage.
- Michael Karp asked if this reduces the energy burden.
- Juliana Williams pointed out that if the goals needed to be prioritized, keeping people connected would come before energy burden. Realizing that any assistance customers receive will reduce their energy burden.
- Patrick Ehrbar agreed with Juliana and believes there is one even higher goal and that is keeping people connected. This would let the customer double dip and it would allow us to serve fewer low income customers.
- Ana Matthews believes that this type of program could increase administrative costs because there is a lot of work on each account.

5. Michael Karp presented another design option-targeted energy burden. This would be in conjunction with other program designs.

6. The group came up with a list of Factors to consider across program design
 - Impact of Design on LIHEAP allocation
 - Grant applied over multiple months
 - Is consistent payment required (are customers removed from assistance if payment is missed)
 - Multi-year certification
 - Does benefit apply to whole bill or rate
 - Is benefit determined by tier, usage, or other
 - Impact of administrative and operational activities (utility and agency)
 - Modeling of design on real client data- low, average, and high
 - Eligibility
 - How will benefit be allocated/applied
 - Is design compatible with other designs
 - Increasing Federal Poverty Level for existing or new program
 - Identify optimal target population
 - How to shape customer expectation with pilot programs

7. The group decided that Sub Committees will develop these proposals to present on March 31st.
 1. Arrearage Management Program-Lea Fisher, Dena Battin, and Ana Matthews
 2. Senior Discount/Coupon Rate-Pat Ehrbar, Carol Weltz, Juliana Williams, and Ryan Finesilver
 3. LIHEAP/ PIPP-Juliana Williams, Julie Honekamp, Ana Matthews, Linda Gervais, Cecil Daniels

8. Homework items were presented
 1. Ana Matthews provided a handout, Funding Allocation Models and reviewed it with the group.
 2. Carol Weltz provided a handout with information on serving LIRAP Heat after June 30th Categorically eligible customers, and 2 year certification
 3. The rest of the Homework items will be presented at the March 31st meeting

Upcoming Workshop Schedule

March 31 – Seattle

April 16 - Spokane

Hold: May 1 and May 8 for possible meetings in Spokane if needed.

Workshop #4 will be held on March 31, 2015 at:

**Westin Hotel
1900 5th Avenue
Seattle, WA 98101**

Please provide any hand outs to be distributed to the group, to Wendy no later than March 27, 2015 at 11am. This will allow for the agreed upon 48-hour window for group materials distribution. Please contact Wendy if you have any questions at 509-495-4565 or wendy.manskey@avistacorp.com.

Avista EAP Work Group Workshop #4
March 31, 2015
Office of the Public Counsel, 800 5th Ave. Suite 2000, Seattle WA
Checking Our Homework

Call-in information: (800) 531-9574 passcode 697494# for participants

Program Goals:

- Keep customers connected
- Look to serve more customers
- Lower the energy burdens of LIRAP participants
- Identify the appropriate data to assess program effectiveness.

Group Agreements

1. I will try to consciously lay aside the assumption that my view of the truth is superior to others' views of the truth and that I am always right (whatever my belief or opinion happens to be on an issue). This openness is remarkable in its facilitation of personal learning.
2. I will try to consciously lay aside all of the prejudices I have regarding other groups of people (employees, bosses, men, women, people in specific occupations, etc.) in order to be open to learning what they can teach me.
3. I will assume positive intentions of others and treat all others with personal and professional respect. I have something to learn from every person who is here
4. I will be as mentally "present" as possible during the workshop, meaning that I will try not to be mentally "somewhere else" while I'm here.
5. I will make every effort to balance my own participation with the participation of others. If I am taking too much "air time," I will try to modify my behavior and encourage others to speak.
6. It is always acceptable to pass.
7. I will speak openly when something is getting in the way of the group or its work together--to the group as a whole, to another participant, or to the trainers.
8. I will attempt to be on time for agreed-upon starting times.
9. I agree to keep confidential all personally identifiable information. This agreement protects individuals who choose to share a relevant example from their own experience without having to worry about it being discussed by others in a very different setting.
10. I agree to ask for clarification when something is not clear to me.

11. I agree to state my name before speaking and to reference any document to which I am referring so the individuals participating by phone can track the conversations more easily.
12. If I am present at the meeting, I will signal my desire to speak by turning my name card vertically. Phone participants will need to verbally indicate when they wish to speak.
13. All materials for the meeting should be distributed to the group, when possible, at least 48 hours before the scheduled workshop.
14. When referring to items written up on the wall, please take a picture and send to the people participating by phone so that they may follow the discussion.

- 9:00 Introductions; procedural check-in; additions/adjustments to the agenda
- 9:15 Senior Discount /Coupon option – Pat, Carol, Juliana, Ryan, Shawn
- 9:45 PIPP/LIHEAP option – Juliana, Julie, Ana, Linda, Cecil, Chuck
- 10:15 BREAK
- 10:30 Arrearage Management option – Lea, Dena, Ana, Michael
- 11:00 Other Homework Discussions/Proposals
- A. Funding/Budgeting/True-Up Discussion – Ryan F.
 - B. Level Billing – Juliana and Chuck
 - C. Increasing LIRAP to 150% FPL/providing larger grants to 0-50% FPL - Julie
 - D. Prioritize by highest energy burden or other characteristic – Dena and Juliana
- 12:00 LUNCH
- 1:00 Homework continued
- E. On-line applications – Lisa and Stefanie (?)
 - F. App't scheduling options/no show rates – Juliana
 - G. Text ability – using technology to the fullest – Lisa and Chuck
 - H. Funding for studies or data analysis – Juliana and SNAP
 - I. Additional reporting Capabilities – Cecil to provide overview of Commerce database.
- 2:30 BREAK
- 3:00 Developing a near term/long term plan
What can be adjusted outside a rate case vs. what must be in a rate case

Avista LIRAP Workshop #4 Minutes
Held Tuesday, March 31, 2015
Westin Hotel, 1900 5th Avenue

Facilitated by: Dr. Al Fein, Gonzaga University

Present:

SNAP: Julie Honekamp, Carol Weltz, and Lucy Lepinski

Energy Project: Chuck Eberdt, Shawn Collins and Michael Karp

Rural Resource: Dena Battin

Avista: Patrick Ehrbar, Linda Gervais, Ryan Finesilver, and Ana Matthews

UTC: Juliana Williams

Department of Commerce: Cecil Daniels

Public Counsel: Lea Fisher and Lisa Gafken

The telephone was not operational for participants by phone.

1. The meeting opened with all attendees reviewing the Group Agreements.
2. Discounted Rate Proposal.

Juliana Williams provided an overview of the Discounted Rate proposal. The key points are:

- The average percent of participants will get a \$300 benefit.
- The low-use customer will get a lower level discount.
- The benefit is based on the average
- There is a potential that someone could get more than a \$300 benefit.
- The discounted rate is applied to the energy rate rather than the basic charge. The benefit in the rate will help the higher user.
- The administration is similar to existing program.
- Timing of eligibility
 - 2 year pilot
 - Participants are signed up for course of a year
 - No recertification for duration of pilot
 - Once signed up, will stay on the program for the duration of the pilot
 - The pilot will run through 2018, and end with the program year in September (e.g. not calendar year).
- The pilot will be only in the SNAP service area (Spokane County).
- Administrative impacts will be assessed
- The proposal includes an assumption on administrative dollars based on the same eligibility as the existing LIRAP Senior Outreach program.
- There will be some overlap with the existing program, with the hope to get more dollars for LIRAP senior into the rate discount.
- With the senior preference for a discounted rate, there is the potential for increased participation. Additional funding will need to be dedicated, but the amount is unknown.

Comments

- Chuck Eberdt asked if the potential of attracting interest among the 125% FPL and below group was considered.
- Juliana Williams responded that the current design avoids affecting LIHEAP. The group was intentional to preserve the LIHEAP allocations. The pilot will help to learn if the discounted rate is more appealing for eligible seniors and the impact on keeping people connected. Other programs will still be available.
- Chuck Eberdt questioned whether individuals interested in the discount will be educated about existing programs or if those seeking general energy assistance will be educated about the discounted rate.

Pat Ehrbar reviewed the Senior Discount rate models.

Comments

- Lucy Lepinski asked for clarification that the \$300 average benefit is the annual benefit amount, and Pat Ehrbar confirmed.
- Juliana Williams asked for clarification on the difference between dual fuel, and heat source.
- Pat Ehrbar explained that the customer will choose which rate (electric or gas) and the intake worker would present the options to the potential participants.
- Julie Honekamp questioned the customer's ability to choose which rate.
- Carol Wertz said that most people generally know their heat source and that part of intake is to review their usage with them.
- Lucy Lepinski asked if the impact for a household of one at 126% FPL Energy Burden had been considered in Pat's models.
- Pat Ehrbar stated that it hadn't because we don't know how many households, occupancy, or income; but that they would look at electric and gas.
- Carol Wertz added that currently SNAP doesn't track usage for Senior program.
- Pat Ehrbar suggested that a model could be provided to help the customer determine the best rate for their situation.
- Dena Battin shared the example of her home, where only she resides and has both electric and gas, she would always choose electric because it is higher benefit and would be more a year around benefit.
- Pat Ehrbar agreed that it would help with her energy burden.
- Dena Battin shared that she can provide energy burden information for seniors as her agency serves lots of seniors and she has income, usage and bill information.
- Chuck Eberdt commented that to figure energy burden, there will need to be collaboration between the utility and agency to share usage and income information. He questioned low income are higher electric vs. gas users (a debate in every rates case), and that low income in the LIRAP are higher than average user based on their need.
- Lea Fisher noted that the model included a finite budget, with finite number of customers and questioned if that meant the program was first come, first serve.
- Pat Ehrbar stated that would be one of the things learned from the pilot.
- Ryan Finesilver added we will see how many participant we have that how many will elect the discounted rate will be learned from the pilot.

- Juliana Williams commented that some of the customers may elect either pilot or existing Senior program, but we are not sure how many.
- Chuck Eberdt asked with the pilot timeframe when intakes would stop in relation to the end of the pilot.
- Juliana Williams responded that the group did not discuss, but trying to learn payment behavior and whether the program helps participants to stay connected.
- Carol Wertz pointed out that with rolling funding, it is hard to capture outcomes and timeframe will be needed.

AI conducted a poll of each group representative for their rating of the program (1 to 5; 5 being most favorable) and support of the program moving forward:

- Linda Gervais for Avista: Rating 4, and supports moving forward
- Julie Honekamp for SNAP: She doesn't have enough information to assess against goal; there may be some benefit for helping with energy burden. But she is generally favorable to move forward.
- Lea Fisher for Public Counsel: Acknowledged there are good components, no concerns just need more time to figure out the unknowns; is favorable for moving forward.
- Juliana Williams for the UTC: Rating 3.5 or 4 and supports moving forward.
- Chuck Eberdt for the Energy Project: Echoes Julie's comments, wants to know answers to play with them but doesn't want to drop something that doesn't work originally. Supports moving forward.
- Dena Battin for Rural Resource: Feels the same as everyone else and would like to see those below 125% FPL have a chance to get enrolled because of a shortage of funds in her area.
- Cecil Daniels for Department of Commerce: Abstained.
- Ed Finklea for NWIGU: Was not present.

3. PIPP

Ana Matthews provided an overview of the PIPP proposal and Juliana Williams presented a model on how PIPP could help participants.

Comments

- Lucy Lepinski questioned the concept of shaping that was mentioned for the fixed credit model for the credit to be increased during the colder weather months.
- Juliana Williams explained that as an example it is like a set escalator of how the credit is applied to the bill to align with the cold weather months.

It was noted that dual fuel may also be set at the 7% of income.

- Michael Karp shared concern about designs that are based on federal LIHEAP because of the uncertainty with funding and questioned what happens to the program design if the federal program is gone, would the program fail?
- Juliana Williams said that the PIPP could work without the federal program. She also commented that the pilots will be a work in progress with learning on how to implement in conjunction with LIHEAP.

- Pat Ehrbar recognized that it could be difficult to cram the program together before June 1, and asked how can we do it?
- Julie Honekamp stated that the issue around money and timing is a question for all projects.
- Al Fein questioned if it would be okay to note in the proposal that the first year would be for planning and implementation would be later.
- Juliana Williams responded that it would be okay to include that in the plan and that the commission is not necessarily expecting implementation by the beginning of the heating season, just some agreement.
- Chuck Eberdt pointed out that there needs to be a better sense of monetary need for the target population, how the project will affect LIHEAP, agencies staff needs to serve more people, and there is no way to know all that by June.

There was a question around when LIHEAP is applied to the account, and Juliana Williams noted that would increase LIHEAP grant benefit impact if applied to the lowest income group.

- Chuck Eberdt shared that Dave from Ohio had mentioned that it was an arbitrary decision that PIPP participants only received 50% LIHEAP benefit. In Washington the LIHEAP benefit varies based on number living in the household, income and consumption.

Al Fein conducted a poll of each group representative for their rating of the program (1 to 5; 5 being most favorable) and support of the program moving forward:

- Julie Honekamp for SNAP: Generally support although there are still quite a few variables to consider recommend keeping looking at it.
- Lea Fisher for Public Counsel: Rating 2.5 but she is not sure that it meet the goal of serving more customers, does think it would lower energy burden and that the data gaps still need to be filled. But the program has merit and she would like to keep discussing it.
- Juliana Williams for UTC: Agrees with Lea, the design recognizes that it won't serve additional, but will serve participants better and will help with energy burden. There is merit in looking at especially in combination with LIHEAP, just need to work out the kinks.
- Chuck Eberdt for the Energy Project: He is trying to see how to make it work, and has questions of funding and whether it will help to serve more or keep more connected but it is worth funding.
- Dena Battin for Rural Resource: She questions the possibility of achieving the dream goal 7% of income.
- Cecil Daniels for Department of Commerce: Generally supports but feasibility is at play and meeting the goals is a caveat but he supports with more research and data.
- Linda Gervais for Avista 3 with more work.

Comments

- Michael Karp commented that a PIP would not necessarily serve more customers, which would require more money.
- Lucy Lepinski noted that serving more with LIHEAP because better serving low-income; it just depends which universe you are looking at.

4. Arrears Management Program (AMP)

Lea Fisher, Dena Battin and Ana Matthews provided an overview of the AMP.

Comments

- Chuck Eberdt questioned the interface between the customer, agency and utility and whether the process could be that the utility would refer customers with high arrears to the agencies. And the agency would need to have a role in what is payment.
- Dena Battin commented that it would need to depend on which program the customer qualifies for. She also noted that an intent of AMP is to prevent Prior Obligation for those customers who want to pay, it gives them a way to make reasonable payment; provides an option and gives enough support to move outside of a disconnect situation.
- Carol Weltz commented that she doesn't want the utility to have income information.
- Pat Ehrbar questioned that bad debt is recoverable in expenses, if the debt is good, is the write-off recoverable, and is the expectation that the utility would forgive the debt out the goodness of heart? He also commented that arrears forgiven would need to be recovered.
- Chuck Eberdt responded that hopefully the forgiven arrears would reduce collections costs.
- Lucy Lepinski shared that in her reading general funds from disconnects were used to cover the costs.
- Michael Karp identified that LIRAP funding is for three components, additional funding for AMP would add a fourth component.
- Dena Battin stated that admin/operational costs and impact would be minimal, as it is not a whole new program.
- Chuck Eberdt said that it is a different animal; it's not bill assistance, its debt recovery. He questions that the expectation is that people would pay \$250 level bill. The AMP he has read expects some contribution from customer within a reasonable timeframe and that utility continues to renegotiate payment arrangements with customer who are having difficulty paying the originally agreed upon amount. Additionally, the literature shows arrears reduction of payment in the first and second months, forgiveness in six months is designing for failure.
- Lisa Gafken suggested that the cost of service and forgiveness amount out of general rates could cover the forgiven amounts.
- Julie Honekamp commented that Ohio allows 24 months for forgiveness.
- Dena Battin stated the program is cost effective.
- Michael Karp cautioned that when looking at other state models look at design, not costs (e.g. the amount of arrears).

Representative comments in regards to supporting the program moving forward:

- Chuck Eberdt for the Energy Project is concerned that the payment plan is affordable for the customer; otherwise the program won't work for those who don't have resources. The program offers a positive so the customer can feel good about making a payment. The utility will get more money than otherwise, and difference may be operational savings, more payments from the customer. He likes the equal payment plan, but doesn't understand if customer misses a payment then they get thrown off the program, the

customer should have the option to make up missed payments and the equal payment plan gets it to affordable. He would like to see this program move ahead.

- Lea Fisher for Public Counsel commented that the key is setting up customer for affordable payments, but is not sure whether there is 50% or a CAP on the forgiven amount. She does think, after conversation that the 12 month timeframe is better. She also pointed out the LIRAP benefit would need to be applied to the monthly payment to keep it affordable.
- Dena Battin for Rural Resource is adamant that AMP is needed.
- Linda Gervais for Avista stated that payment arrangements are something the Avista Customer Service Representatives (CSRs) do every day; there are 75,000 arrangements each year. If a customer missed a payment, we renegotiate the arrangement with them. We do a good job of serving customers in this regard. Additionally, customers can enroll in Comfort Level Billing with two months of arrears. But people want the lower bill in the warm weather months, and want the level bill in the winter. She stated that AMP doesn't fit into the context of the goals of keeping people connected. It is not something that can be supported as proposed; she would like to see it ironed out on how it all comes together.
- Cecil Daniels for Department of Commerce abstained from the vote.
- Julie Honekamp for SNAP leans toward coordinating with other design programs.

Al Fein questioned why wouldn't the utility "match" a portion if someone is willing to pay a half? There were comments that changing the term from "forgiveness" to "match" may be an approach.

5. Ryan presented the proposed modification for Funding/Budgeting/True-Up.

Comments

- Julie Honekamp stated that true-up in October defeats the purpose of award notification in May.
- Michael Karp suggested an 18 month program year similar to LIHEAP might be helpful.
- Juliana Williams stated there could be a rates change to provide certainty for the agencies that is not dependent on collections.
- Pat Ehrbar explained that the rate is designed to achieve the budget, and a change could be recovered to annual rate adjustment.
- Lucy Lepinski stated that adjusting in October doesn't help SNAP, and that deferring to another heating season would be helpful.

The group discussed that a set budget amount would be beneficial in helping to better serve the population. The tradeoff for the agencies is they won't get revenue increases.

- Carol Weltz noted that the level/set amount will help her to do her work better, and maybe even more with better planning and ability due to predictability.
- Lucy Lepinski questioned the need to disperse funds quarterly.
- Ryan Finesilver explained there are Admin election options. Which include the monthly (current method), or before or after quarter because it aligns with reporting.

The group unanimously supported the modification with note that favors a variable rate to match that budget.

6. Pat Ehrbar proposed that a modification be the formation of a LIRAP Advisory Group that would meet regularly (quarterly) to talk through issues of modifications and additions, with the possibility of merging with DSM Advisory Group.

Comments

- Michael Karp recommended not combining the two groups.
- Lea Fisher supported Michael's recommendations, and stated that two different funding sources shouldn't be combined.
- Lucy Lepinski shared it could be beneficial for some participants of the Advisory Group to participate in both programs (DSM and LIRAP).
- Linda Gervais stated that weatherization is \$2,000,000.
- Shawn Collins noted that program refinements could be accomplished in smaller increments and that combining the two groups may work because it is the same clientele and there may be a constructive way of pulling the two groups together.
- Juliana Williams suggested that they could be two separate groups that meet jointly periodically.

The group unanimously agreed to establish the LIRAP Advisory Group, with the following comments:

- Chuck Eberdt stated it is a great idea, but don't plant it in concrete.
- Linda Gervais suggested that it be written into the modifications to meet two times a year, Pat Ehrbar agreed semiannually.
- Al Fein pointed out that it helps to move through the issues of the proposal.

7. Cecil provided an overview of the Commerce database capabilities.

The following agencies use the LIHEAP system direct entry form:

- Community Action Partnership of Idaho
- Washington Gorge Action Program
- Rural Resources Development Association
- Community Action Center

The following agencies use the LIHEAP system to upload LIRAP information from their own data systems:

- Spokane Neighborhood Action Partners
- OIC (soon to begin using the direct entry form)

The agencies are using all required fields for calculating a LIHEAP benefit, demographic information for federal reporting; household information, benefit award vendor and amount are used for LIRAP and stored in the database. There are also a number of optional fields related to households that receive LIHEAP. These can be entered on households for LIRAP benefits as well.

A blank hard copy of the LIHEAP Household Information Form contains all the LIHEAP fields available in the system. However there are special LIRAP Services fields provided for LIRAP only agencies that are generated by the system and reflected on a hard copy HIF for LIRAP payments.

The four direct entry agencies use reports from the system. There are three special LIRAP reports and an Agency Spending report that provides LIRAP information from the system. We do not know if upload agencies use the system reports, but it is highly unlikely as they can provide that service from their own system.

Comments

- Juliana Williams asked about the capability of accessing data to help with determining energy burden and Cecil Daniels confirmed the information is available.

8. Juliana Williams and Chuck Eberdt discussed spreading the grant over a 12 month period, and that exploration is not needed with the work being done for the program proposals.

9. Julie Honekamp presented regarding the modification of moving from 125% FPL to 150% FPL. LIHEAP guidelines state that the maximum is 150% FPL, Washington goes lower at 125% but many states are at 150% FPL. An Apprise report identified that two Utility programs in WA state are at 175%. The modification could be accomplished by de-coupling/splitting LIRAP from LIHEAP.

Comments

- Dena Battin stated that figuring out LIRAP Heat differently than LIHEAP could add an administrative burden because the Commerce database figures it at 125%.

10. Regarding the proposed modification of prioritizing by highest energy burden or other characteristic. Juliana Williams acknowledged that it could be a scale factor for the agencies, but recommends processing with the current processes and the conversation could be continued with the advisory group.

Comments

- Dena Battin said it could be difficult for larger agencies to prioritize customers. At her agency, she is able to prioritize for disabled and fixed income.
- Michael Karp said that the federal program prioritizes outreach for seniors, disabled and households with young children.
- Lucy Lepinski suggested a wait list for special characteristics.
- Juliana Williams stated that a priority list could be based on energy burden, and PIPP would help to fill the need. She shared a need for a waiting list for those who didn't get an energy assistance appointment was a good idea, but we don't have a good sense of how many were turned away and how those numbers should be tracked. We need to learn the difference between eligible population, and those who were turned away.
- Michael Karp noted the program needed to expend funds in time to assess energy burden. He gave the comparison of weatherization, where a home is easy to assess the program

impact, but there is no way around the need to spend time with an individual to determine energy burden. There is some risk in prioritizing.

11. Lisa Gafken led the conversation regarding the online application modification, and the need to assure access is a concern. She had obtained information regarding an initiative in New Hampshire. There is a group that seems similar in structure to the LIRAP workshop group that is working on the NH online solution. They are considering that the application will need to be printed, and the online experience to be similar to completing the online tax form. The group is considering software capabilities, and certification happens outside of the online activity. The group had not considered accessibility, or cost to agencies.

Comments

- Julie Honekamp commented that Ohio has one online application for both energy assistance and weatherization.
- Al Fein identified that it relates to the goal of data.

13. Juliana Williams noted the need to track people who didn't get appointments and the process for that needs to be worked out but she is willing to put it off for now.

14. Lisa Gafken reviewed the texting document that she and Chuck Eberdt created. Some key notes are:

- Accessibility issue with low-income individuals, with penetration further down the poverty scale.
- There are wireless rules (Linda Gervais stated: FCC rules) around when, how commercial business can text individuals, one is a requirement that customers opt-in to receive texts from the entity.
- There are issues with standard messaging costs

Comments

- Linda Gervais shared that Avista is hopeful to have outage information, planned outage information and restoration texting capabilities by the end of the year.
- Utility would need to send through aggregator entity. An essential component is the requirement to have a short code; the application process takes two-three months. Short codes have leases.
- Chuck Eberdt stated that utilities in Texas do send texts regarding account status and load increases. Low income have trouble with utility, probably have phone bill issues too, may not be a reliable communication source.
- Carol Weltz said that CAP in Idaho uses text messaging to remind clients of their appointments and what their grant is.
- Lisa Gafken doesn't want to disregard texting as an option. It shouldn't be primary but it should be on the radar as a method.

- Ryan Finesilver questioned what kind of information and who would text message.
- Lisa Gafken provided some examples that utilities send messages around appointment reminders, and usage and pointed out that it could be a way to make the program operate better; however a formal way of communicating should be established.
- Linda Gervais shared the example of Flat Head Valley Co-op that offers flex-pay (pre-pay). Through their Text Smart Hub, they send text messages to customers, five days ahead of when customer only has X amount left in account; the program is growing in popularity among customers by leaps and bounds (as is Kootenai Electric's program). Under the program the customer matches their cash flow to their usage; it is not exclusive to low-income. Customers pay at kiosk for their advanced meter.
- Julie Honekamp said it could be a supplement to client customer. Through SNAP's voicemail program they have learned many individuals run through their minutes by the middle of the month. Additionally, Facebook seems to work as an effective method for notifying eligible persons about appointments. SNAP believes texting may help with the no-show rates.
- Juliana Williams questioned whether non-profits would fall under the same commercial guidelines, and to obtain client authorization to send text at initial appointment scheduling.
- Linda Gervais said it would be helpful to get an idea how many individuals would be interested in this form of communication.
- Lisa Gafken commented that the application form could include the opt-in option for receiving text messages.
- Juliana Williams asked about the costs for the short code. Lisa Gafken said there wasn't a lot of public information around costs. Linda Gervais will research costs.

15. Juliana Williams and Julie Honekamp will provide information regarding funding for studies or data analysis at a later meeting.

14. Chuck Eberdt suggested that we should start crafting language around modifications and additions that we have agreement on. Additionally, a clear structure for funding (instead of every rate case, e.g., what can we do within a rate case and outside of a rate case) is needed. He posed that a subgroup could craft a plan that would work for the next three to five years.

Comments

- Linda Gervais offered that the core group would need to decide and to include Pat Ehrbar because he does rates and the proposal includes implementation of the discounted rate, then phase in PIPP over a few years. Furthermore, the Avista attorney, and all parties in the directive should assure the proposal is within the order requirements.
- Julie Honekamp commented that the plan for the next five years needs to include the models to figure out what the group wants to do and the money needed.
- Michael Karp said that the funding steps over multiple years, with categories and increases in households served should be modeled out. He cautioned that we don't wait too long for the one while moving forward to meet the goals of the collaborative.
- Julie does not see them as exclusive.

- Lucy Lepinski noted that the scope is greater than today, and should pinpoint modifications from the last workshop in short and longer term.
- Juliana Williams said that additional detail is needed for the PIPP group characteristics from Commerce to help determine the scope of the program, number of customers, the cost per customer on average to resolve the pot of money needed to address the population.
- Dena Battin stated the easiest to implement is senior discount, and the costs would not be too extraordinary, just a training curve to overcome.
- Chuck Eberdt reviewed the next workshop agenda.
- Lea Fisher suggested group should determine how to move forward with the options.
- Julie Honekamp proposed moving forward with the following modifications:
 - a) Ryan’s proposal: earlier budget notification, fixed budget, agency Admin/Program Support and ConEd S&L payment options, Avista Con Ed share reduced to .8%, and removing the standing electric to gas adjustment for SNAP
 - b) Discount Rate Pilot this fall, PIPP and AMP at a later date
 - c) LIRAP year around
 - d) LIRAP Advisory Group
 - e) Two year verification for seniors
 - f) Text capability
 - g) Option spread grant over multiple months
- Pat Ehrbar concurred, and pointed out that all presented options can be worked on under the LIRAP Advisory Group.
- Juliana Williams stated that the collective proposal should include what will happen now, and next program year, and the PIPP and AMP would need a sense of scale and it would be unlikely that we would be able to serve the entire eligible population.
- Michael Karp presented a concept that laid out the LIRAP Modifications and pilot Additions, including added households served by year with start and end dates, the initial budget for filing the report, reporting, research, and the need to identify the cost of doing a pilot that includes evaluation and additional households served.

The group came up with a list of Modifications that will move forward in the filing

1. Funding as fixed annual budget
 2. Earlier (May) communication of budget
 3. True-up Mechanism
 4. Flexible use of budget
 5. LIRAP Advisory Group
 6. LIRAP year-round
- Lucy Lepinski reviewed the modification list with the group to call out what would **not** be moving forward with the current proposal, but would be considered under the LIRAP Advisory Group:
 - Level billing – including grant and different incentives for choosing this option
 - Allocation beyond meter count
 - Categorically eligible

- Self-certification
 - Increase LIRAP to 150% FPL, and larger grants for 0-50% FPL
 - Prioritize by highest energy burden and other things
 - Apply on-line
 - Appointment Schedule Options and No Show rates
 - Two year certification for seniors
- It was determined that “more funding for studies” and “document data needs” are not program modifications. And based on the last meeting “low-income exempt from Schedule 92 and 192” is not a viable modification.
 - Lea Fisher questioned how texting is a program addition.
 - Juliana Williams stated that it is a program enhancement.
 - Carol Wertz commented the Lewiston CAP currently texts their clients.
 - Michael Karp commented that funding is embedded in modification and additions.
 - Juliana Williams noted that a funding plan will be needed.
 - Michael Karp questioned about the modification of heat versus energy.
 - Carol Wertz commented that LIHEAP is only Heat.

Representative support of the modifications as presented:

- SNAP is good with one caveat; the two year verification should be for those on fixed incomes, therefore for LIRAP Senior.
- Avista is good with all but the option to spread grant over multiple months, as it may need to be the agency to send the credit if Avista CC&B cannot perform the function. Julie Honekamp commented that could be a challenge.
- Lucy Lepinski read a note from the SNAP Finance Director that taking and tracking the grant award over two program years would be problematic.
- Lisa Gafken and Lea Fisher are good with one concern about flexible use of budget. They don’t believe that it would be abused but wonder where the backstop is, and the fiscal responsibility.
- Dena Battin shared that spending is monitored by Avista.
- Carol Wertz said they are contractually responsible to LIHEAP provide service till March 15th.
- Chuck Eberdt explained that this needs to be clear, especially for the filing.
- Juliana Williams said she is not ready to fully support the two year certification for seniors.
- Chuck Eberdt added that he is still puzzled by the text capabilities.
- Dena Battin commented that she has concerns with two year certification because of household changes that occur in her area, but assumed the pilot could monitor the rate of that occurrence.
- Chuck Eberdt said that if someone qualifies as one household one year, and then the household size increases they will seek more assistance based on the need.
- Dena Battin stated that with the annual applications they send out annually they find new situations and the household will qualify for other programs.

Comments

- Pat Ehrbar recommended and it was agreed to move the two-year existing verification for seniors to the LIRAP Advisory Group.
- Lucy Lepinski pointed out that the option to spread grant over multiple months is problematic as SNAP would have to set up an encumbered system; Pat Ehrbar believes that Avista can do that.
- Juliana Williams needs to consult with others at her agency.

Overall, all were in favor of the modifications with the changes noted.

15. Juliana Williams suggested that small groups may be needed to do the financial modeling to get the pilot proposals past 70% completion.

The Additions/New Program Designs were agreed upon by the Group

- A. Rate Discount (seniors, disabled)
- B. PIPP
- C. Arrearage Management Plan (will be discussed in LIRAP Advisory Group)
- D. LIRAP Energy

Comments

- Lea Fisher shared that if the group is not certain about any one pilot proposal moving forward, then we should make the determination so the teams don't do the work; it didn't seem like it was time for AMP.
- Dena Battin would like to see more on the models before making that determination.
- Pat Ehrbar doesn't know if he can overcome issues within to get company buy-in as AMP is not LIRAP related, it would require a billing change to implement, and doesn't see that happening by June 1.
- Chuck Eberdt agreed that AMP would not be done by June 1 but over the long-term would like to figure out how to make it work. Through his reading he has learned that utilities are reluctant at first, but after one year say they would never get rid of the program.
- Pat Ehrbar commented that a longer term would be needed to ruminate over the idea. LIRAP Energy grant model calculated on annual vs. heat would constitute removal from current design. Pat explained the amount of the grant would change.
- Chuck Eberdt commented that consumption amounts considered would be affected.
- Dena Battin added the benefit would be towards the base-load.
- Lisa Gafken wondered what the visceral feelings were about the remaining pilots to prioritize.
- Michael Karp said pilot should be prioritized and staggered.
- Lucy Lepinski said for agency capacity, we should only take on one at a time and recommended that it should be PIPP.
- Julie Honekamp concurred that a senior discount is easier, but PIPP impacts a broader group.
- Dena Battin suggested LIRAP Energy would need to be recalculated and it can't be in the filing in the next four weeks. She supports starting with senior discount with follow-up

compliment of PIPP and AMP but it will take work. Then will have specific program for all our target groups, maybe by next heating season.

- Michael Karp commented that falls into the funding, timeline strategy.
- Chuck Ebert recommends limiting scope to the discounted rate pilot then we would have between the filing and October to put pilot together to start.
- Pat Ehrbar said the commission liked the discounted rate, so it is a quick win for the group.
- Shawn Collins supports Rate Discount, PIPP, and AMP. The LIRAP Energy should be agency discretion about when to implement. It has to be determined for PIPP ramp up or down, and there seems to be momentum round the idea to shape and for a timeline, such as five years.
- Lucy Lepinski liked Shawn's proposal; the caveat would be that for the LIRAP Energy, if LIRAP and LIHEAP are de-coupled, people could get both then program will serve less because they can qualify for both.
- Chuck Eberdt said that option should be up to the agency.
- Dena Battin supported that she likes it calculated as a separate grant, in addition to LIHEAP.
- Carol Weltz likes Rate Discount and PIPP, doesn't want to run two pilot programs at one time.
- Michael Karp shared that under PSE Help there is a percentage that get LIHEAP and HELP, so they start HELP before LIHEAP and then close it when LIHEAP comes. Clients are blind as to whether they are receiving LIHEAP heat or LIRAP energy.
- Juliana Williams is concerned that making the decision who to get heat vs. energy may be introducing unfairness, may not be impactful, and she is less inclined to move forward with heat vs. energy in terms of filing.
- Carol Weltz suggested that changing to LIRAP Energy program will need longer discussion and needs to go to the LIRAP Advisory Group.
- Chuck Eberdt commented that PIPP is different from LIHEAP.
- Michael Karp stated that year around program is moot.
- Juliana Williams said that PIPP is based on income not usage, so it becomes energy.
- Lucy Lepinski asked if the proposal to move forward is with rate discount for the fall with the list of modifications and a commitment to explore the potential of PIPP. The group was in favor of this proposal.
- Julie Honekamp said PIPP and AMP get to LIRAP energy.
- Al Fein suggested that rather than a five year program, it could be a multi-year program.
- Juliana Williams said the commission would have final approval for the proposal and PIPP or AMP would need a subsequent proposal to the commission for approval.
- Michael Karp suggested a draft proposal should include a timeline and funding strategy that identifies when the pilot would kick in, and the amount of years, number of added households served, the approximate cost range and evaluation.
- Julie Honekamp commented that funding will depend on additional data, as an example it will help inform the expected range of benefit, expected cost per customer, and give an idea of how much.
- Carol Weltz stated that she doesn't want to do two pilots at the same time, but it will be okay to have an evaluation with a new pilot start at the same time.

- Lucy Lepinski wondered if Carol Weltz and Pat Ehrbar can work together to start to draft the models.
- Pat Ehrbar said he needs to have an internal conversation about the money needed to implement the modifications.
- Michael Karp stated a group is needed to work on the modifications, the new LIRAP design is over x amount of year to meet criteria for the goals, and the financial impact of the pilot, and clarity around additional households. The goal is to serve additional households, he wants to do that immediately or they will forego millions of dollars, and as an advocate it was the commission's desire to help more households.
- Pat Ehrbar said the increase with the last order is used for these purposes, what we need to work through is to see where we are with increased funding.
- Julie Honekamp commented that a five year program with no increase is a problem.
- Michael Karp questioned what is the agency capacity and need, for an annual percent increase in the fall. With the rate case coming up, is it to be dealt with in testimony or settlement.
- Pat Ehrbar said to get to a number agreement would be with the workshop.
- Juliana Williams said the group achieved progress in the last hour with modifications and additions, and could devote time to funding at the next meeting. There is still additional work needed before weighing in.
- Linda Gervais noted that it doesn't preclude anyone from coming in with straw-man of how it could work at the next meeting.
- Lucy Lepinski said more work is needed on the discounted rates proposal, need more data from Commerce.
- Pat Ehrbar clarified that Commerce only has up to 125% FPL, and that Avista already has done that work.
- Ryan Finesilver confirmed that his model included electric, gas and combo.
- Pat Ehrbar said what will be put forth in the rate discount may be different for the population, and we will learn from pilot participants rather than from an arbitrary group.
- Linda Gervais said the pilot would help inform, and the program can be tailored based on what is learned.
- Carol Weltz will work with Michael Karp on his proposal.
- Chuck Eberdt said the usage characteristics may be different between LIRAP Senior, Heat and overall and a range is needed.

Upcoming Workshop Schedule

Hold: May 1 and May 8 for possible meetings in Spokane if needed.

Workshop #5 will be held on April 16, 2015 at:

SNAP

3102 W. Fort George Wright Drive

Spokane, WA 99224

Please provide any hand outs to be distributed to the group, to Wendy no later than April 13, 2015 at 11am. This will allow for the agreed upon 48-hour window for group materials distribution. Please contact Wendy if you have any questions at (509)495-4564 or wendy.manskey@avistacorp.com.

Avista EAP Work Group Workshop #5
April 16, 2015
SNAP, 3102 W. Fort George Wright Dr., Spokane, WA

Call-in information: 800-531-9574 – pass code 697494#

Program Goals:

- Keep customers connected
- Look to serve more customers
- Lower the energy burdens of LIRAP participants
- Identify the appropriate data to assess program effectiveness.

Group Agreements

1. I will try to consciously lay aside the assumption that my view of the truth is superior to others' views of the truth and that I am always right (whatever my belief or opinion happens to be on an issue). This openness is remarkable in its facilitation of personal learning.
2. I will try to consciously lay aside all of the prejudices I have regarding other groups of people (employees, bosses, men, women, people in specific occupations, etc.) in order to be open to learning what they can teach me.
3. I will assume positive intentions of others and treat all others with personal and professional respect. I have something to learn from every person who is here
4. I will be as mentally "present" as possible during the workshop, meaning that I will try not to be mentally "somewhere else" while I'm here.
5. I will make every effort to balance my own participation with the participation of others. If I am taking too much "air time," I will try to modify my behavior and encourage others to speak.
6. It is always acceptable to pass.
7. I will speak openly when something is getting in the way of the group or its work together-- to the group as a whole, to another participant, or to the trainers.
8. I will attempt to be on time for agreed-upon starting times.
9. I agree to keep confidential all personally identifiable information. This agreement protects individuals who choose to share a relevant example from their own experience without having to worry about it being discussed by others in a very different setting.
10. I agree to ask for clarification when something is not clear to me.
11. I agree to state my name before speaking and to reference any document to which I am

referring so the individuals participating by phone can track the conversations more easily.

12. If I am present at the meeting, I will signal my desire to speak by turning my name card vertically. Phone participants will need to verbally indicate when they wish to speak.
13. All materials for the meeting should be distributed to the group, when possible, at least 48 hours before the scheduled workshop.
14. When referring to items written up on the wall, please take a picture and send to the people participating by phone so that they may follow the discussion.

9:00 Introductions; procedural check-in; additions/adjustments to the agenda

9:15 **Summation/Discussion of Agreed-to Modifications to the existing LIRAP** with particular attention to the ongoing Advisory Group function - Chuck will provide a summary for examination before the meeting.

10:15 **BREAK**

10:30 **Details of the Senior/Disabled Discount Rate Pilot**

- A. Description to date
- B. Timing – when should the pilot begin, how long should it run, when evaluated?
- C. Size – how determined (# customers, funding level, agencies involved, statistical significance)
- D. Funding – how determined, collected, allocated and accounted for?

12:00 **LUNCH**

1:00 **PIPP/AMP Pilot option** – what detail is needed for the June 1 proposal

- A. Description to date
- B. Timing
- C. Size
- D. Funding

2:00 **Issues/Questions that require further determination:**

How does this process interface with the GRC? and
Can we create a multi-year plan with step increases in clients assisted?
How do we establish revenue for future pilots?
Can the utility charge A&G costs to Schedule 92/192?
What still needs to be determined to begin the draft response?
Who will draft the response?

2:30 **BREAK**

2:45 Continue discussion

4:30 ADJOURN

Avista LIRAP Workshop #5 Minutes
Held Tuesday, April 16, 2015
SNAP, 3102 West Fort George Wright Drive

Facilitated by: Dr. Al Fein, Gonzaga University

Present:

SNAP: Julie Honekamp, Carol Weltz, and Lucy Lepinski

Energy Project: Chuck Eberdt, Shawn Collins and Michael Karp

Rural Resource: Dena Battin

Avista: Linda Gervais, Ryan Finesilver, Ana Matthews, Chris Drake, and Wendy Manskey

UTC: Juliana Williams

Public Counsel: Lisa Gafken

There were no participants by phone.

I. The meeting opened with all attendees reviewing the minutes from Workshop number four.

II. Chuck Eberdt and Juliana Williams took the group through the handout, **Modifications to the Existing Low-Income Rate Assistance Program (LIRAP) and Outline for June 1 LIRAP Filing**. The two documents were used to come up with a draft outline for the June 1, 2015 filing.

Outline for June 1 LIRAP filing

1. Background
 - a. Brief history of LIRAP
 - b. UE-140188/UG-140189 Rate Case Settlement and Order
 - c. Series of workshops and party participation
 - d. Desire to avoid negative impacts on state allocation of LIHEAP funds
2. Proposed Modifications
 - a. Funding for LIRAP will be allocated as a fixed annual budget, rather than collected and allocated on a month-to-month basis.
 - b. Avista will inform agencies with a fixed annual budget allocation by the end of May, each year.
 - c. Agencies will have discretion to spend allocated budget during the program year in the manner that best fits their operation of the program. All Non-Direct¹ expenditures must not exceed agreed upon amount.
 - d. LIRAP Heat grants may be awarded through the end of the program year, rather than ending concurrent with the LIHEAP grants, according to agencies' planned program implementation.
 - i. Grants still based on heating costs, rather than energy costs.
 - e. Avista will establish a true-up mechanism for Schedules 92 and 192 and make an annual filing to adjust rates and collect the necessary program revenue, similar process to Schedules 91 and 191 for Avista's conservation programs.

¹ Non-Direct expenditures include Conservation Education, Administration, Program Support, Staff and Labor.

- i. Date of annual filing will be June 1.
 - ii. Total LIRAP revenue requirement would still be set in [rate cases or this settlement]
 - iii. The true-up will only adjust rates to collect the total LIRAP revenue requirement of each year. Any funds unspent by an agency by the end of the program year will remain available to the agency for the next program year.

- f. Avista will establish an ongoing energy assistance program advisory group to monitor and explore ways to improve the program.
 - i. Continue to explore possible pilots, assess the results of the changes in this proposal.
 - ii. At least two meetings per year.
 - iii. Ground rules and goals should be established as well as the governance structure
 - iv. Membership-Avista will extend an invitation to all agencies, Public Counsel, NIGU, ICNU, Staff, Energy Project, and others and it would be voluntary participation. Any interested parties who may have an opinion may come and speak at the meetings.
 - v. Avista will not charge the LIRAP program for any funds associated with advisory group meetings. Avista will cover travel costs, when appropriate, for agencies to attend the advisory group meetings, out of Washington Gas and Electric (general) funds.
 - vi. Avista and the agencies will explore the option of spreading LIRAP benefits across multiple months, rather than as a one-time lump sum credit to a customer's bill.

A vote was taken to approve the content of the outline so far and to the modifications. There was one hundred percent approval of concepts.

III. Juliana Williams presented the **Senior/Disabled Rate Discount Pilot** outline. The group provided input and changes.

1. A rate discount will be offered to interested fixed-income seniors and fixed-income customers with disability, whose household income is between 126-200% of FPL.
2. Senior customers who are eligible and do not want to receive the rate discount may still opt for the Senior LIRAP grant.
3. This program is available to a new population of customers who have not previously had assistance (disabled customers 126-200% FPL).
4. The \$/kwh and \$/therm discounts are designed to provide an average benefit of \$300 per participant per year.
5. The actual benefit amount each customer receives may be more or less than \$300 depending on usage.

6. The discount will be applied to all three rate blocks.
7. The rate discount will be available year-round.
8. Eligible customers may receive the rate discount for either one year or the duration of the pilot intake period, whichever is longer.
9. The rate discounts will be: [RYAN TO PROVIDE]
10. Dual fuel customers may only receive the rate discount for either their electric bill or their natural gas bill, but not both. The customer may choose which bill to apply the discount to.
11. The agencies will provide intake and determine eligibility for the rate discount pilot.
12. The pilot will enroll participants from October 2015 to September 2017 (intake period).
13. Agencies will provide Avista and the advisory group with pilot updates monthly. Avista will provide updates on customer usage and actual benefits to the agencies monthly.
14. Avista will issue an RFP for an evaluation of the rate discount pilot. The evaluation will consider:
 - a. Whether the rate discount has significantly different impacts on participant disconnection rates compared to the existing Senior LIRAP program.
 - b. The impact of the rate discount on participant energy burden, compared to the existing Senior LIRAP program.
 - c. The overlap between the rate discount participants and prior recipients of the Senior LIRAP grant; the number of new customers enrolled in the rate discount program that have not received prior assistance; whether there are additional participants in the Senior LIRAP program due to migration of customers to the rate discount.
 - d. Participant reception/reaction to the pilot.
 - e. Process elements, including whether the intake process for rate discount program is more or less resource intensive compared to the existing Senior LIRAP program.
 - f. The effectiveness of outreach methods.
 - g. Why customers choose a rate discount instead of a grant.
 - h. How the customer benefit compared to pilot expectations.
 - i. Recommended improvements to the program going forward.
15. Agencies will aim to enroll 800 customers over the 24-month pilot.
16. Avista will assist with outreach for the pilot.
17. The pilot will be run by SNAP and Rural Resources [?] with a split of [TBD].
18. The total budget of the 24-month pilot will be [\$\$\$].
19. Funding for the pilot will be a three year plan, in addition to the existing LIRAP budget, and would be tracked independently.

During this discussion Julie Honekamp provided a **LIRAP Draft Timeline and Initial Draft Conversation Budget**.

Comments

- Linda Gervais suggested members of the group meet with the Commissioners before the filing in order to discuss and explain the modifications and the pilot program.
- Julie Honekamp would like to come up with the split of participants, in the pilot. (This is in regards to number 17 above).

The Senior/Disabled Rate Discount Pilot discussion continued and Linda Gervais presented **Low Income Funding as a Percent of Revenue** and possible **Electric and Gas Funding Ramp Up** for the next five years. This plan would be in addition to the current LIRAP funding in rates. There was no consensus, on funding, by the participants.

A vote was taken to approve the content of the Senior/Disabled Rate Discount Pilot. There was one hundred percent approval of the above outline in concept.

The group discussed what detail is needed for **PIPP and AMP Pilot** for the June 1 filing. PIPP and AMP are going to be tabled and sent to the LIRAP Advisory Group for future exploration and program design. The proposal for the PIPP will be filed, on or before January 15, 2017. The filing will need to include the following. Chuck Eberdt and Shawn Collins will draft the proposal by April 24, 2015.

1. The background. What is a PIPP? Describe the statutory background and why we are really interested in it, our vision of who it would be available to, parties to say why they are interested in it, or why we were unable to resolve the issues by June 1 filing.
2. Benefit Description-7% energy burden (has been discussed)
3. Timing-we have a time frame for assessing the program
4. Touch on the relationship with LIHEAP
5. The applicability to a range of customers
6. How this solution reaches our goals
7. Funding for program and funding for Advisory Group
8. AMP has many issues and fewer that have been agreed upon

A vote was taken to approve the content of the PIPP and AMP filing. There was one hundred percent approval of the above outline in concept.

The filing to the Commission will be drafted by members of the group before the next meeting.

Linda Gervais will draft the template and build in the background and work with Juliana Williams and others. She will also put together the Tariffs including the additional funding rate and the true-up mechanism, as well as the Modifications section by April 24, 2015.

Juliana Williams will draft the Rate Discount Portion of the filing and a specific date requesting a decision from the Commission by April 27, 2015.

Upcoming Workshop Schedule

Hold: May 8 for possible meeting in Spokane if needed.

Workshop #6 will be held on May 1, 2015 at:

SNAP

3102 W. Fort George Wright Drive

Spokane, WA 99224

Please provide any hand outs to be distributed to the group, to Wendy no later than April 29, 2015 at 11am. This will allow for the agreed upon 48-hour window for group materials distribution. Please contact Wendy if you have any questions at (509)495-4564 or wendy.manskey@avistacorp.com.

Avista EAP Work Group Workshop #6
May 1, 2015
SNAP, 3102 W. Fort George Wright Dr., Spokane, WA

Call-in information: 800-531-9574 – pass code 697494#

AGENDA

Listed below are the topics that will comprise the discussion for the 6th workshop. They will be taken up in the order listed. Please keep in mind the following program goals and group agreements.

1. The process going forward regarding the proposed advisory group and further work on PIPP and/or AMP proposals/pilots.
2. Budget/Interaction with the GRC process
 - a. Budget for the agreed to modifications and Fixed-Income Disabled/Seniors pilot.
 - b. Budget for the process going forward: for the process, for any future pilots, other.
 - c. Interaction with the GRC, ongoing LIRAP funding aside from the pilots/process.
3. Walk-through the Filing Draft to be sent 4/28/15.

Program Goals:

1. Keep customers connected
2. Look to serve more customers
3. Lower the energy burdens of LIRAP participants
4. Identify the appropriate data to assess program effectiveness.

Group Agreements

1. I will try to consciously lay aside the assumption that my view of the truth is superior to others' views of the truth and that I am always right (whatever my belief or opinion happens to be on an issue). This openness is remarkable in its facilitation of personal learning.
2. I will try to consciously lay aside all of the prejudices I have regarding other groups of people (employees, bosses, men, women, people in specific occupations, etc.) in order to be open to learning what they can teach me.

3. I will assume positive intentions of others and treat all others with personal and professional respect. I have something to learn from every person who is here
4. I will be as mentally “present” as possible during the workshop, meaning that I will try not to be mentally “somewhere else” while I’m here.
5. I will make every effort to balance my own participation with the participation of others. If I am taking too much “air time,” I will try to modify my behavior and encourage others to speak.
6. It is always acceptable to pass.
7. I will speak openly when something is getting in the way of the group or its work together--to the group as a whole, to another participant, or to the trainers.
8. I will attempt to be on time for agreed-upon starting times.
9. I agree to keep confidential all personally identifiable information. This agreement protects individuals who choose to share a relevant example from their own experience without having to worry about it being discussed by others in a very different setting.
10. I agree to ask for clarification when something is not clear to me.
11. I agree to state my name before speaking and to reference any document to which I am referring so the individuals participating by phone can track the conversations more easily.
12. If I am present at the meeting, I will signal my desire to speak by turning my name card vertically. Phone participants will need to verbally indicate when they wish to speak.
13. All materials for the meeting should be distributed to the group, when possible, at least 48 hours before the scheduled workshop.
14. When referring to items written up on the wall, please take a picture and send to the people participating by phone so that they may follow the discussion.

Avista LIRAP Workshop #6 Minutes
Held Tuesday, May 1, 2015
SNAP, 3102 West Fort George Wright Drive

Facilitated by: Dr. Al Fein, Gonzaga University

Present:

SNAP: Carol Weltz, and Lucy Lepinski

Energy Project: Chuck Eberdt, Shawn Collins and Michael Karp

Rural Resource: Dena Battin

Avista: Linda Gervais, Patrick Ehrbar, Ana Matthews, and Wendy Manskey

UTC: Juliana Williams

Participating by telephone:

Public Counsel: Lisa Gafken and Lea Fisher

- I. The meeting opened with all attendees reviewing the minutes from Workshop number five and approving them as amended.

- II. The Workgroup began by going through the draft of the Petition. Each part of the Petition was presented by the drafter of the segment. Members of the group were assigned various sections to draft verbiage.
 1. Votes were taken for each section of the Petition, with 100 percent support of the concepts.
 2. To eliminate confusion, as well as for version control purposes, the edits and suggestions made to the Petition, as reviewed during the meeting are currently being drafted by the voting members .

- III. Process for going forward with the advisory group and further work on PIPP and AMP proposals.
 1. Avista will initiate the discussions for the PIPP and the AMP in the future.

Timeline to Complete Filing

Juliana Williams will contact Industrial Customers of Northwest Utilities.

Patrick Ehrbar will contact Ed Finklea.

Wednesday, May 6th, additions and changes to the draft from the Workgroup will be sent to Linda Gervais.

Friday, May 8th, Linda Gervais will send out Version Two of the filing to only the voting members of the Workgroup.

Wednesday, May 13th, the Workgroup will return their edits to Linda Gervais.

Friday, May 15th, Linda Gervais will send out Version Three of the filing to only the voting members of the Workgroup.

Tuesday, May 19th, at 9am there will be a conference call for voting members to make any small changes and approve the Final Draft by vote.

Joint Petition for LIRAP Modifications-Additions
(May 2015)

ATTACHMENT C

Avista Electric
LIRAP Rate Calculation

		Present Sch. 92 <u>LIRAP Rate</u>	Present LIRAP Billing <u>Determinants</u>	Present LIRAP <u>Revenue</u>	LIRAP Funding <u>Allocation</u>	Proposed LIRAP <u>Revenue</u>	Proposed Sch 92 <u>kWh Rate</u>	Rate Impact	LIRAP Funding Increase	Present Billed Revenue	LIRAP Percentae Increase
1 Residential	1	\$ 0.00081	2,378,478,031	\$ 1,926,567	\$ 93,330	\$ 2,019,898	\$ 0.00085	\$ 0.00004	4.8%	\$209,870,080	0.04%
2 General Service	11/12	\$ 0.00117	588,401,236	\$ 688,429	\$ 33,350	\$ 721,780	\$ 0.00123	\$ 0.00006	4.8%	\$72,174,501	0.05%
3 Large General Service	21/22	\$ 0.00085	1,419,228,271	\$ 1,206,344	\$ 58,440	\$ 1,264,784	\$ 0.00089	\$ 0.00004	4.8%	\$131,529,019	0.04%
4 Extra Large General Service	25	\$ 0.00053	684,890,760	\$ 362,992	\$ 17,585	\$ 380,577	\$ 0.00056	\$ 0.00003	4.8%	\$65,303,120	0.03%
5 Pumping Service	30/31/32	\$ 0.00074	137,227,044	\$ 101,548	\$ 4,919	\$ 106,467	\$ 0.00078	\$ 0.00004	4.8%	\$11,536,413	0.04%
6 Street & Area Lights	41-48	0.99%	25,127,765	<u>\$ 69,495</u>	<u>\$ 3,367</u>	<u>\$ 72,862</u>	1.04%	0.05%	4.8%	<u>\$7,299,487</u>	0.05%
7 Total			5,233,353,107	\$ 4,355,376	\$ 210,992	\$ 4,566,368				\$497,712,619	0.04%

* The 3rd block billing determinants of Schedule 25 excluded per UE-140188.

Allocation \$ 210,992

Avista Natural Gas
LIRAP Rate Calculation

		Present Sch 192 <u>Therm Rate</u>	Billing <u>Determinants</u>	Present LIRAP <u>Revenue</u>	LIRAP Funding <u>Allocation</u>	Proposed LIRAP <u>Revenue</u>	Proposed Sch 192 <u>Therm Rate</u>	Rate Impact	LIRAP Funding Increase	Present Billed Revenue	LIRAP Percentage Increase
1	General Service	101 \$ 0.01410	120,721,607	\$ 1,702,175	\$ 82,460	\$ 1,784,635	\$ 0.01478	\$ 0.00068	4.8%	\$ 126,234,040	0.07%
2	Large General Service	111/112 \$ 0.01182	47,537,282	\$ 561,891	\$ 27,220	\$ 589,111	\$ 0.01239	\$ 0.00057	4.8%	\$ 39,284,679	0.07%
3	Large General Svc.-High Annual Load Factor	121/122 \$ 0.01079	5,735,037	\$ 61,881	\$ 2,998	\$ 64,879	\$ 0.01131	\$ 0.00052	4.8%	\$ 4,345,438	0.07%
4	Interruptible Service	131/132 \$ 0.01037	1,115,704	\$ 11,570	\$ 560	\$ 12,130	\$ 0.01087	\$ 0.00050	4.8%	\$ 761,567	0.07%
5	Transportation Service	146 \$ -	30,580,202	\$ -	\$ 25,770	\$ 25,770	\$ 0.00084	\$ 0.00084		\$ 2,575,572	1.00%
6	Special Contracts	148 \$ -	<u>49,497,099</u>	\$ -	\$ -	\$ -	\$ -	\$ -		<u>\$ 1,606,576</u>	0.00%
7	Total		255,186,931	\$ 2,337,516	\$ 139,008	\$ 2,476,525				\$ 174,807,871	0.08%
					Allocation	\$ 113,238					
					Sch 146	\$ 25,770					
						\$ 139,008					
					Schedule 146						
					Base Revenue	\$ 2,577,000					
					1% LIRAP	\$ 25,770					

**AVISTA UTILITIES
WASHINGTON ELECTRIC
PILOT LOW-INCOME RATE DISCOUNT BUDGET AND AVAILABILITY**

Total Low-Income Rate Discount Budget	Distribution of revenue to electric customers	Electric Low-Income Rate Discount Budget
\$240,000	58%	\$139,200

Income tier	Average LIRAP Heat grant	Budget per customer	Proportion of LIRAP HEAT Recipients	Budget per income tier	Estimated participants per income tier
(a)	(b)	(d)	(e)	(f)	(g)
126-200% FPL	\$300	\$300	100.0%	\$139,200	464

**AVISTA UTILITIES
WASHINGTON ELECTRIC
PILOT LOW-INCOME RATE DISCOUNT BUDGET AND AVAILABILITY**

Total Low-Income Rate Discount Budget	Distribution of revenue to electric customers	Electric Low-Income Rate Discount Budget
\$240,000	42%	\$100,800

Income tier	Average LIRAP Heat grant	Budget per customer	Proportion of LIRAP HEAT Recipients	Budget per income tier	Estimated participants per income tier
(a)	(b)	(d)	(e)	(f)	(g)
126-200% FPL	\$300	\$300	100.0%	\$100,800	336

**AVISTA UTILITIES
WASHINGTON ELECTRIC
PILOT LOW-INCOME RATE DISCOUNT PROPOSAL**

Type of Service (a)	Present Billing Rate (b)	Rate Discount as a Percentage of Billing Rate (c)	Schedule 89 - LIRAP Rate Discount (d)	Total Billing Rate (e)
Residential Service - Schedule 1, 126-200% of FPL				
Basic Charge	\$ 8.50	0.0%	\$ -	\$ 8.50
First 800 kWhs	\$ 0.07316	43.1%	\$ 0.03153	\$ 0.04163
800 - 1,500 kWhs	\$ 0.08546	36.9%	\$ 0.03153	\$ 0.05393
All over 1,500 kWhs	\$ 0.10055	31.4%	\$ 0.03153	\$ 0.06902

**AVISTA UTILITIES
WASHINGTON NATURAL GAS
PILOT LOW-INCOME DISCOUNT RATE PROPOSAL**

Type of Service (a)	Present Billing Rate (b)	Rate Discount as a Percentage of Billing Rate (c)	Schedule 189 - LIRAP Rate Discount (d)	Total Billing Rate (e)
General Service Schedule 101, 126-200% of FPL				
Basic Charge	\$ 9.00	0.0%	\$ -	\$ 9.00
First 70 Therms	\$ 0.86998	46.7%	\$ 0.40663	\$ 0.46335
All over 70 Therms	\$ 0.97611	41.7%	\$ 0.40663	\$ 0.56948

Customer would receive discounted rate for whichever service is their primary energy source.

Bill Impact Analysis at Different Usage Levels

Schedule 1 Billing Rates

Basic Charge	\$ 8.50
First 800 kWhs	\$ 0.07316
Next 700 kWhs	\$ 0.08546
Over 1500 kWhs	\$ 0.10055

Residential Service - Schedule 1, 126-200% of FPL

Basic Charge	\$ 8.50
First 800 kWhs	\$ 0.04163
Next 700 kWhs	\$ 0.05393
Over 1500 kWhs	\$ 0.06902

Schedule 101 Billing Rates

Basic Charge	\$ 9.00
First 70 Therms	\$ 0.86998
Over 70 Therms	\$ 0.97611

General Service Schedule 101, 126-200% of FPL

Basic Charge	\$ 9.00
First 70 Therms	\$ 0.46335
Over 70 Therms	\$ 0.56948

Electric Bill Impact Analysis

	Full Bill	126-200% FPL	Savings	Savings %
Bill at 600 kWhs	\$ 52.40	\$ 33.48	\$ 18.92	36%
Bill at 792.8 kWhs	\$ 66.50	\$ 41.50	\$ 25.00	38%
Bill at 1000 kWhs	\$ 84.12	\$ 52.59	\$ 31.53	37%
Bill at 1200 kWhs	\$ 101.21	\$ 63.37	\$ 37.84	37%
Bill at 1400 kWhs	\$ 118.30	\$ 74.16	\$ 44.15	37%
Bill at 1600 kWhs	\$ 136.91	\$ 86.45	\$ 50.45	37%
Bill at 1800 kWhs	\$ 157.02	\$ 100.25	\$ 56.76	36%
Bill at 2000 kWhs	\$ 177.13	\$ 114.06	\$ 63.07	36%
Bill at 2200 kWhs	\$ 197.24	\$ 127.86	\$ 69.37	35%
Bill at 2400 kWhs	\$ 217.35	\$ 141.66	\$ 75.68	35%
Bill at 2600 kWhs	\$ 237.46	\$ 155.47	\$ 81.99	35%

Natural Gas Bill Impact Analysis

	Full Bill	126-200% FPL	Savings	Savings %
Bill at 15 therms	\$ 22.05	\$ 15.95	\$ 6.10	28%
Bill at 30 therms	\$ 35.10	\$ 22.90	\$ 12.20	35%
Bill at 50 therms	\$ 52.50	\$ 32.17	\$ 20.33	39%
Bill at 61.48 therms	\$ 62.49	\$ 37.49	\$ 25.00	40%
Bill at 70 therms	\$ 69.90	\$ 41.43	\$ 28.46	41%
Bill at 80 therms	\$ 79.66	\$ 47.13	\$ 32.53	41%
Bill at 90 therms	\$ 89.42	\$ 52.82	\$ 36.60	41%
Bill at 100 therms	\$ 99.18	\$ 58.52	\$ 40.66	41%
Bill at 120 therms	\$ 118.70	\$ 69.91	\$ 48.80	41%
Bill at 140 therms	\$ 138.23	\$ 81.30	\$ 56.93	41%
Bill at 160 therms	\$ 157.75	\$ 92.69	\$ 65.06	41%

Average Electric Monthly Use 792.80 kWh

Average Natural Gas Monthly Use \$ 61.48 Therms

Electric Bill Impacts (Budget Look)

Customers	792.8 kWhs	Total Savings
126-200% FPL	464	\$ 139,201 \$ 300.00

Natural Gas Bill Impacts (Budget Look)

Customers	61.48 Therms	Total Savings
126-200% FPL	336	\$ 100,798 \$ 300.00

Customer would receive discounted rate for whichever service is their primary energy source.

Joint Petition for LIRAP Modifications-Additions
(May 2015)

ATTACHMENT D

**INSTITUTE FOR PUBLIC POLICY
AND ECONOMIC ANALYSIS**

**An Estimate of the Number
of Households in Poverty
Served by Avista Utilities in
Washington State**

By:

Brian Kennedy, MS

D. Patrick Jones, Ph.D.

May, 2015



EASTERN
WASHINGTON UNIVERSITY

start something **big**

An Estimate of the Number of Households Served by Avista Utilities in Washington State in Poverty

By

Brian Kennedy, MS

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D. Patrick Jones, Ph.D.

Institute for Public Policy and Economic Analysis, EWU
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May, 2015

For SNAP, Spokane, Washington

SNAP has requested that EWU's Institute of Public Policy & Economic Analysis (the Institute) estimate the number of residential customers of Avista Utility in the state of Washington who live at various levels of poverty. The Avista service territory in the state includes the following counties, ranked by customer count: Spokane, Stevens, Whitman, Asotin, Adams, Lincoln, Klickitat, Skamania, Franklin and Grant.

Since Avista's billing records do not contain information of household income, an additional source was needed. Census, in particular, the American Community Survey, provided this information. Due to the wide variation of incomes within many counties, Institute analysts opted to examine poverty at the smallest level of geography easily available to us, the census tract. A census tract is a unit of measure typically encompassing 4,000 to 8,000 people. While there is undoubtedly some variation of incomes within census tracts, it is undeniably less than at the county level, especially for counties such as Spokane and Stevens.

The first step in the analysis was to learn which census tracts fall into Avista's Washington service territory. Per request, the GIS department of Avista geocoded all their Washington residential customers by census tract and sent the Institute a summary of all tracts with at least one residential household as customers and the customer count. (Thank you, Allen Cousins and Robert Cloward.) The tracts numbered 147.

The remaining steps employed the most recent estimates of households in each census tract. At this level of geography, Census provides 5-year rolling estimates and the most recent period

covered 2009-2013. A ratio was developed for each census tract, showing the estimated share of Avista residential customers (households) in the tract. Within each tract, this share was then applied to a count of households with income at or below five levels of the Federal Poverty Level (FPL): 50%, 125%, 150%, 185% and 200%.

The FPL varies by the size of the family, although not by location. Counted are all forms of monetary income, including transfer payments, unemployment compensation and alimony. Not counted, however, are noncash benefits from federal or state programs, such as food stamps, housing subsidies, or Medicaid payments? FPL thresholds increase every year, in direct proportion to the national CPI. For 2013, the (100%) FPLs for various family sizes, assuming adults under the age of 65, were:

- One adult: \$12,119
- Two adults: \$15,600
- Two adults and one child: \$18,751
- Two adults and two children: \$23,624

A five year average for these years would produce lower thresholds.

Once all calculations had been done for each FPL within each tract, the tracts were rolled up into county totals for each of the five FPLs. These are given in the following tables in the shaded column.

For some counties – Asotin, Stevens and Whitman – the household estimate was lower than the Avista county roll. In all but one case, however, the Avista count was less than the upper bound of the ACS estimate. For the case where the Avista count exceeded the upper bound of the confidence interval of the relevant total household estimate, Stevens County,

Institute analysts opted to use the Avista number, as it comes from administrative records.

In a further step, Institute analysts expressed the estimated number of Avista customers (households) at or below a given FPL as a share of all Avista customers. These shares are given by county by FPL in the right-hand column of each table. As one observe, there is substantial variation among the counties of the incidence of poverty among Avista customers. One should, however, treat the results for Whitman County with caution, since poverty rates are typically higher in counties with a substantial percentage of the population who are students living off-campus. This would seem to apply to the Pullman area and to a lesser degree, Spokane.

With these qualifications, one can observe that the estimate of the total number of Avista customers living at or below the 50%, 125%, 150%, 185% & 200% of the FPL were: **18,624, 51,130, 62,946, 79,285** and **85,159**, respectively. We emphasize that these counts are not of people, but of households. With the exception of Whitman, average household size for all counties is around 2.5. Consequently, the people count of those living at or below certain FPLs is much higher.

Beyond the following tables, this report contains an appendix of maps of the estimated distribution of Avista-served households for the geographies considered, by the five FPLs. These maps offer the detail of within-county, or in some case, within-counties, variation of poverty, using census tracts as the base unit. Due to the small presence of Avista in several counties, some of the maps consolidate two or more counties.

The maps break out the distribution of households living at or below certain levels of poverty within each census tract into eight brackets. Colors in yellows to red indicate an increasing higher percentage; colors light green to dark green connote a decreasing percentage of poverty. As one case readily observe, for those maps portraying the distribution at or below the 50% FPL, most census tracts contain small percentages. The results vary by county or county grouping, however. For Spokane County, 17 census tracts have at least 12.6% of the households living at or below that FPL. In Ferry and Stevens counties, three of thirteen census tracts fall into that category. There is but one census tract in the counties of Adams, Franklin, Grant and Lincoln served by Avista at this FPL; similarly, in the two census tracts of relevance in Klickitat and Skamania counties, none shows up in this look at household poverty.

In contrast, an examination of the incidence of household poverty measured at the 200% FPL reveals few census tracts in any of the counties escape the presence of some poverty. For Spokane, one can find only five with shares in the lowest bracket (0.1-12.5%). For Ferry and Stevens counties, not one tract falls into this low incidence bracket. In the counties covered in south central Washington, only one tract (Lincoln County) shows the lowest incidence of poverty. Finally, neither one of the two census tracts in Klickitat and Skamania Counties demonstrates a low incidence at the 200% FPL.

In general, poverty is concentrated when measured at the most acute measurement levels. At the broadest level (200% FPL), however, very few census tracts escape having a non-trivial percentage of their households in poverty.

Table 1. Estimates of the Number of Households in Avista’s Service Area at or Below 50% FPL

County	American Community Survey Estimated Households	Total Avista Customers (Households)	Estimated Avista Customers: 50% of Poverty Limit	Estimated Share of Avista Customers: 50% Poverty Limit
Adams	5,747	4,540	518	11.4%
Asotin	9,052	9,294	393	4.2%
Ferry	1,669	1,630	197	12.1%
Franklin	2,683	167	14	8.5%
Grant	1,163	10	0	4.6%
Klickitat	3,656	763	67	8.8%
Lincoln	4,463	3,462	180	5.2%
Skamania	764	320	26	8.2%
Spokane	186,259	169,287	12,000	7.1%
Stevens	17,569	19,972	1,584	7.9%
Whitman	16,630	17,437	3,644	20.9%
Total	249,657	226,882	18,624	8.2%

Table 2. Estimates of the Number of Households in Avista’s Service Area at or Below 125% FPL

County	American Community Survey Estimated Households	Total Avista Customers (Households)	Estimated Avista Customers: 125% of Poverty Limit	Estimated Share of Avista Customers: 125% Poverty Limit
Adams	5,747	4,540	1,425	31.4%
Asotin	9,052	9,294	1,835	19.7%
Ferry	1,669	1,630	480	29.4%
Franklin	2,683	167	47	28.1%
Grant	1,163	10	3	26.6%
Klickitat	3,656	763	229	30.1%
Lincoln	4,463	3,462	714	20.6%
Skamania	764	320	66	20.7%
Spokane	186,259	169,287	35,070	20.7%
Stevens	17,569	19,972	4,596	23.0%
Whitman	16,630	17,437	6,665	38.2%
Total	249,657	226,882	51,130	22.5%

Table 3. Estimates of the Number of Households in Avista’s Service Area at or Below 150% FPL

County	American Community Survey Estimated Households	Total Avista Customers (Households)	Estimated Avista Customers: 150% of Poverty Limit	Estimated Share of Avista Customers: 150% Poverty Limit
Adams	5,747	4,540	1,692	37.3%
Asotin	9,052	9,294	2,264	24.4%
Ferry	1,669	1,630	667	40.9%
Franklin	2,683	167	61	36.7%
Grant	1,163	10	3	32.1%
Klickitat	3,656	763	263	34.5%
Lincoln	4,463	3,462	866	25.0%
Skamania	764	320	82	25.6%
Spokane	186,259	169,287	43,613	25.8%
Stevens	17,569	19,972	6,113	30.6%
Whitman	16,630	17,437	7,322	42.0%
Total	249,657	226,882	62,946	27.7%

Table 4. Estimates of the Number of Households in Avista’s Service Area at or Below 185% FPL

County	American Community Survey Estimated Households	Total Avista Customers (Households)	Estimated Avista Customers: 185% of Poverty Limit	Estimated Share of Avista Customers: 185% Poverty Limit
Adams	5,747	4,540	2,046	45.1%
Asotin	9,052	9,294	3,102	33.4%
Ferry	1,669	1,630	783	48.0%
Franklin	2,683	167	78	46.7%
Grant	1,163	10	4	40.8%
Klickitat	3,656	763	345	45.2%
Lincoln	4,463	3,462	1,102	31.8%
Skamania	764	320	91	28.6%
Spokane	186,259	169,287	55,279	32.7%
Stevens	17,569	19,972	8,079	40.5%
Whitman	16,630	17,437	8,375	48.0%
Total	249,657	226,882	79,285	34.9%

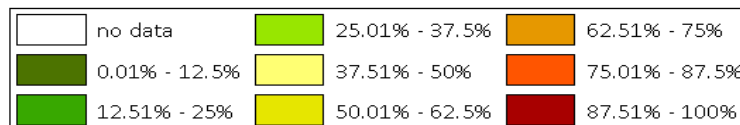
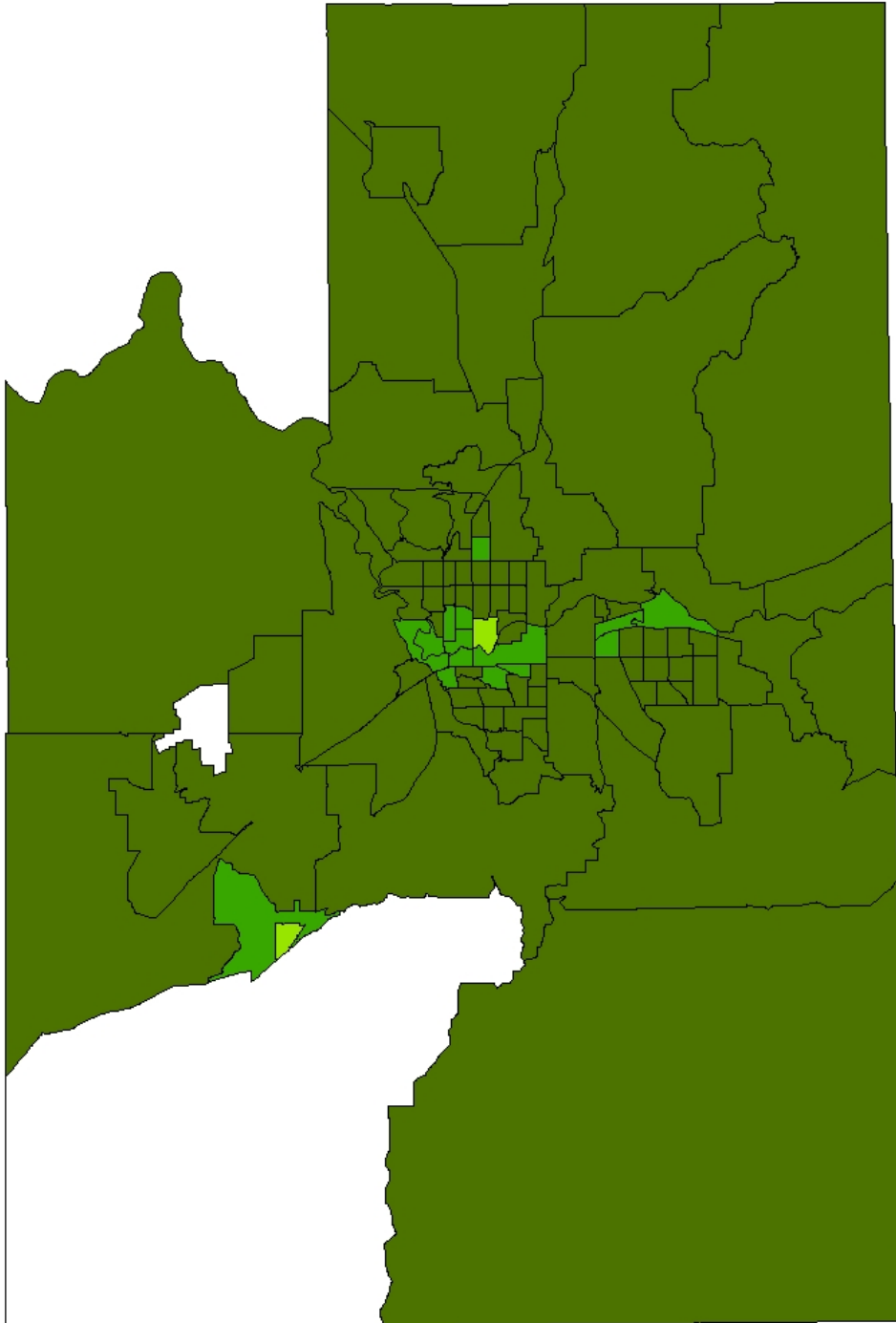
Table 5. Estimates of the Number of Households in Avista’s Service Area at or Below 200% FPL

County	American Community Survey Estimated Households	Total Avista Customers (Households)	Estimated Avista Customers: 200% of Poverty Limit	Estimated Share of Avista Customers: 200% Poverty Limit
Adams	5,747	4,540	2,310	50.9%
Asotin	9,052	9,294	3,488	37.5%
Ferry	1,669	1,630	813	49.9%
Franklin	2,683	167	85	51.1%
Grant	1,163	10	5	49.8%
Klickitat	3,656	763	376	49.2%
Lincoln	4,463	3,462	1,242	35.9%
Skamania	764	320	100	31.3%
Spokane	186,259	169,287	59,532	35.2%
Stevens	17,569	19,972	8,412	42.1%
Whitman	16,630	17,437	8,796	50.4%
Total	249,657	226,882	85,159	37.5%

Appendix A.

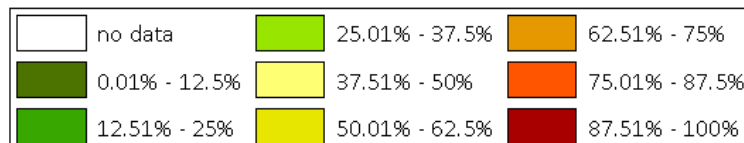
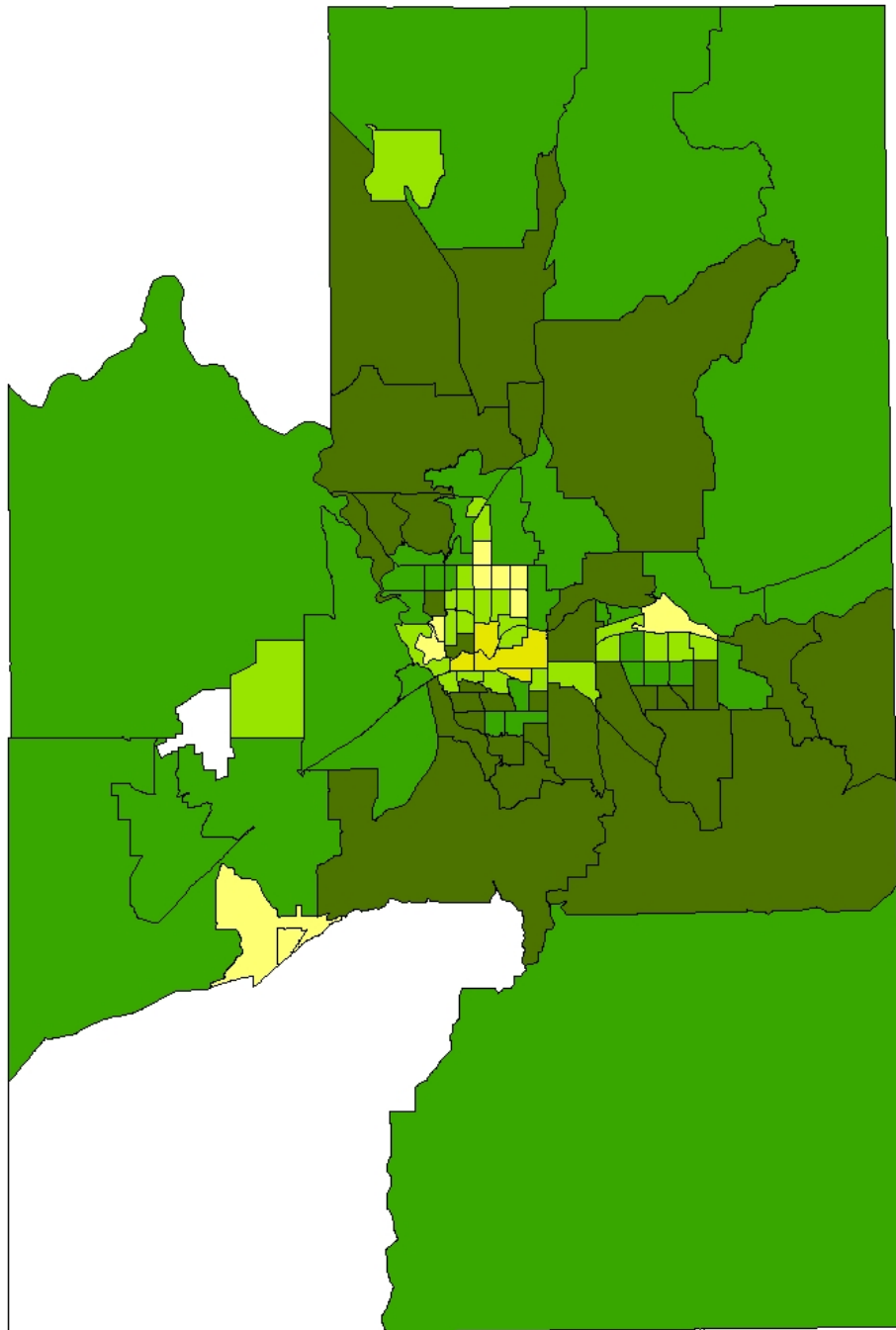
Spokane County:

Share of the population living at or below 50% of the poverty level by census tract



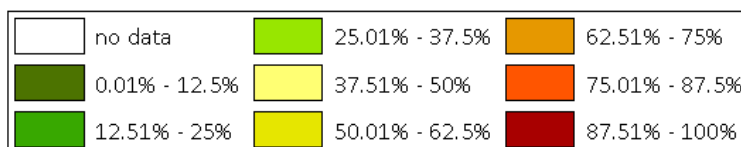
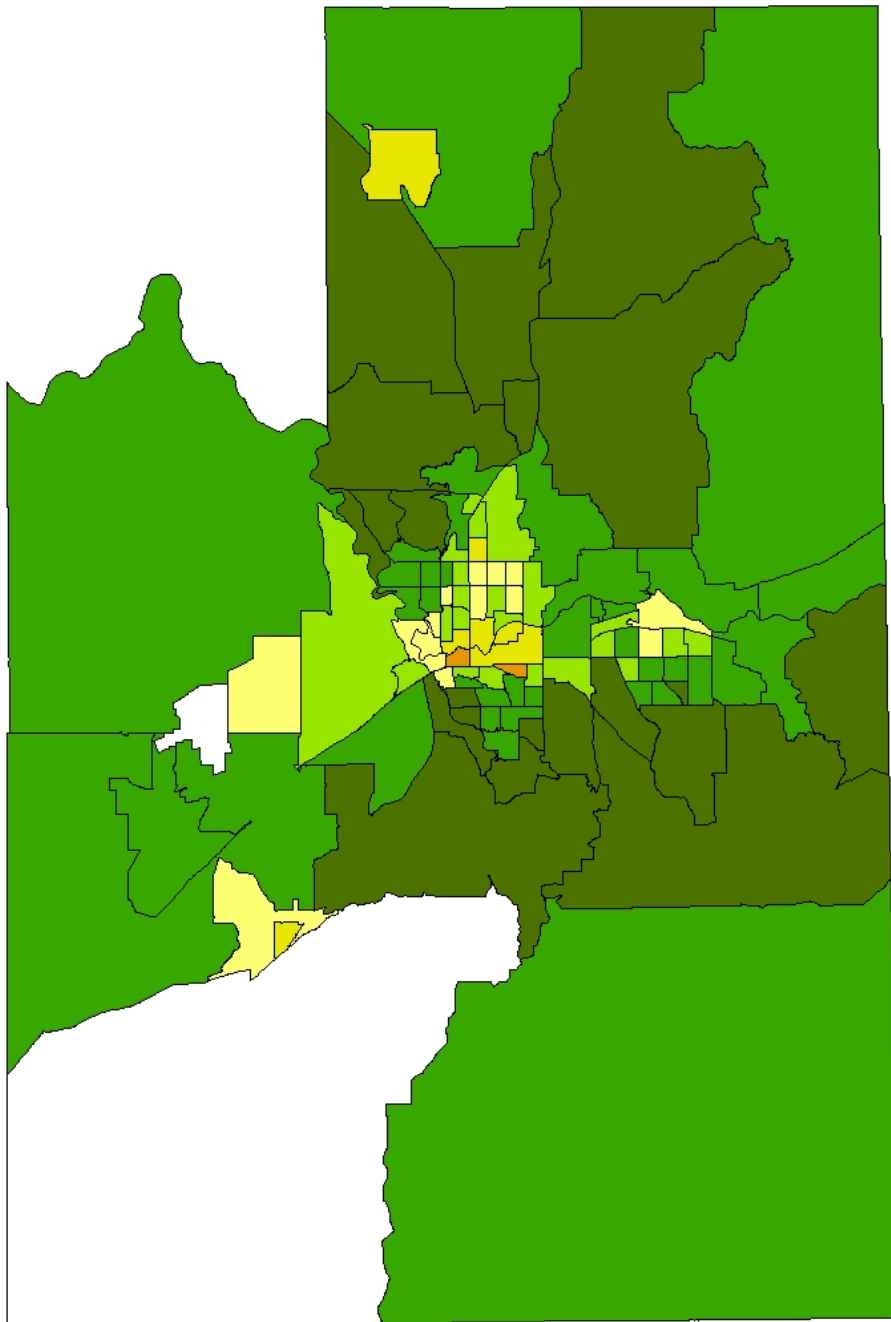
Spokane County:

Share of the population living at or below 125% of the poverty level by census tract



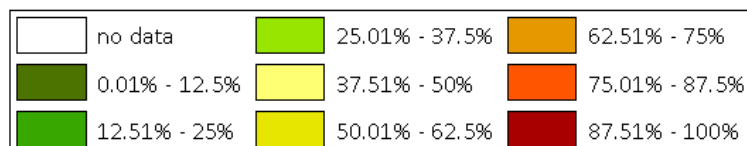
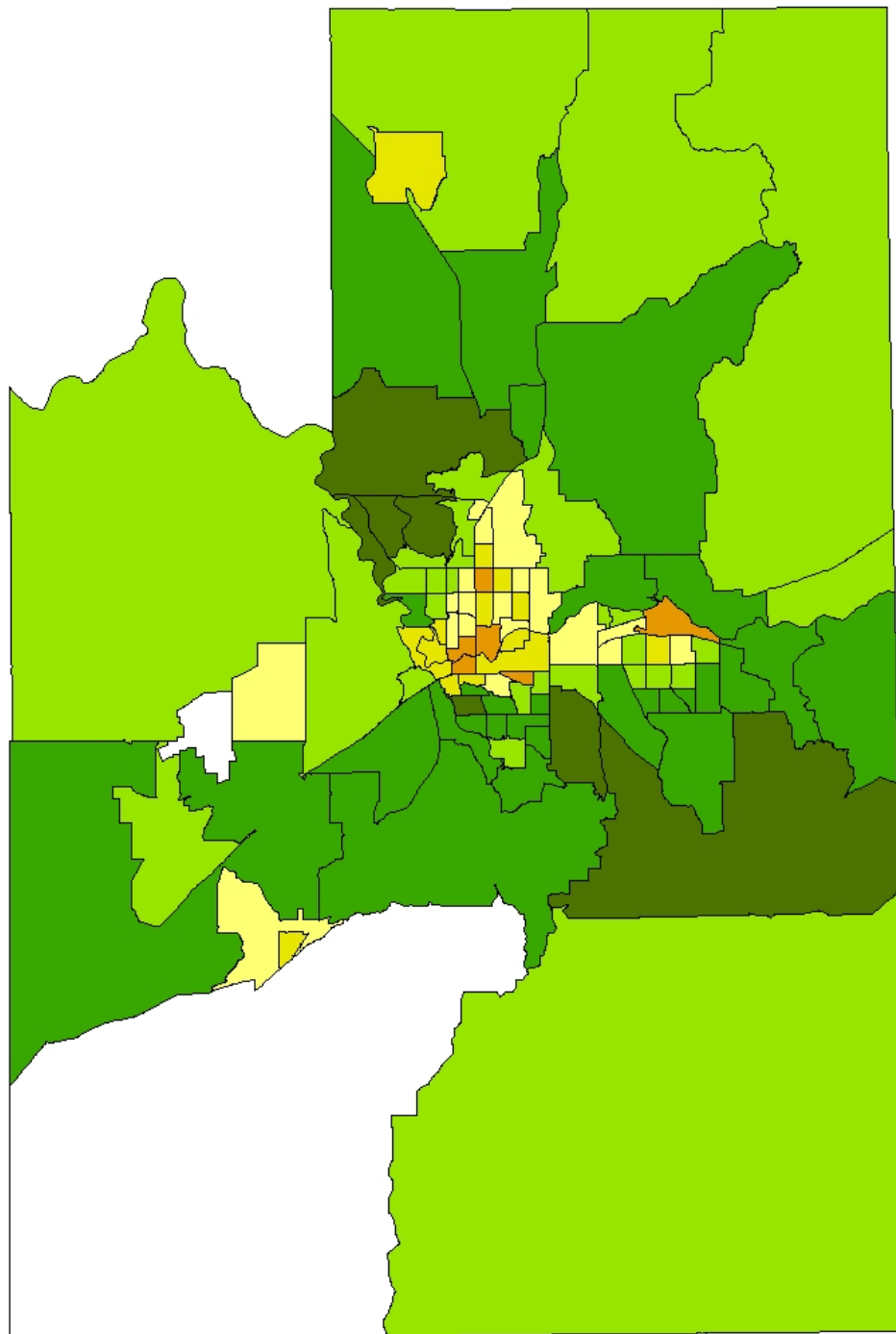
Spokane County:

Share of the population living at or below *150%* of the poverty level by census tract



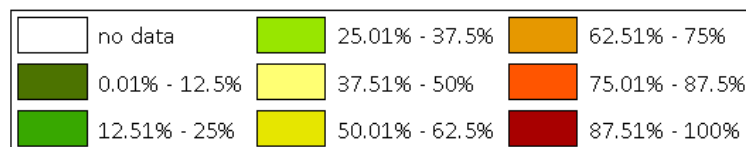
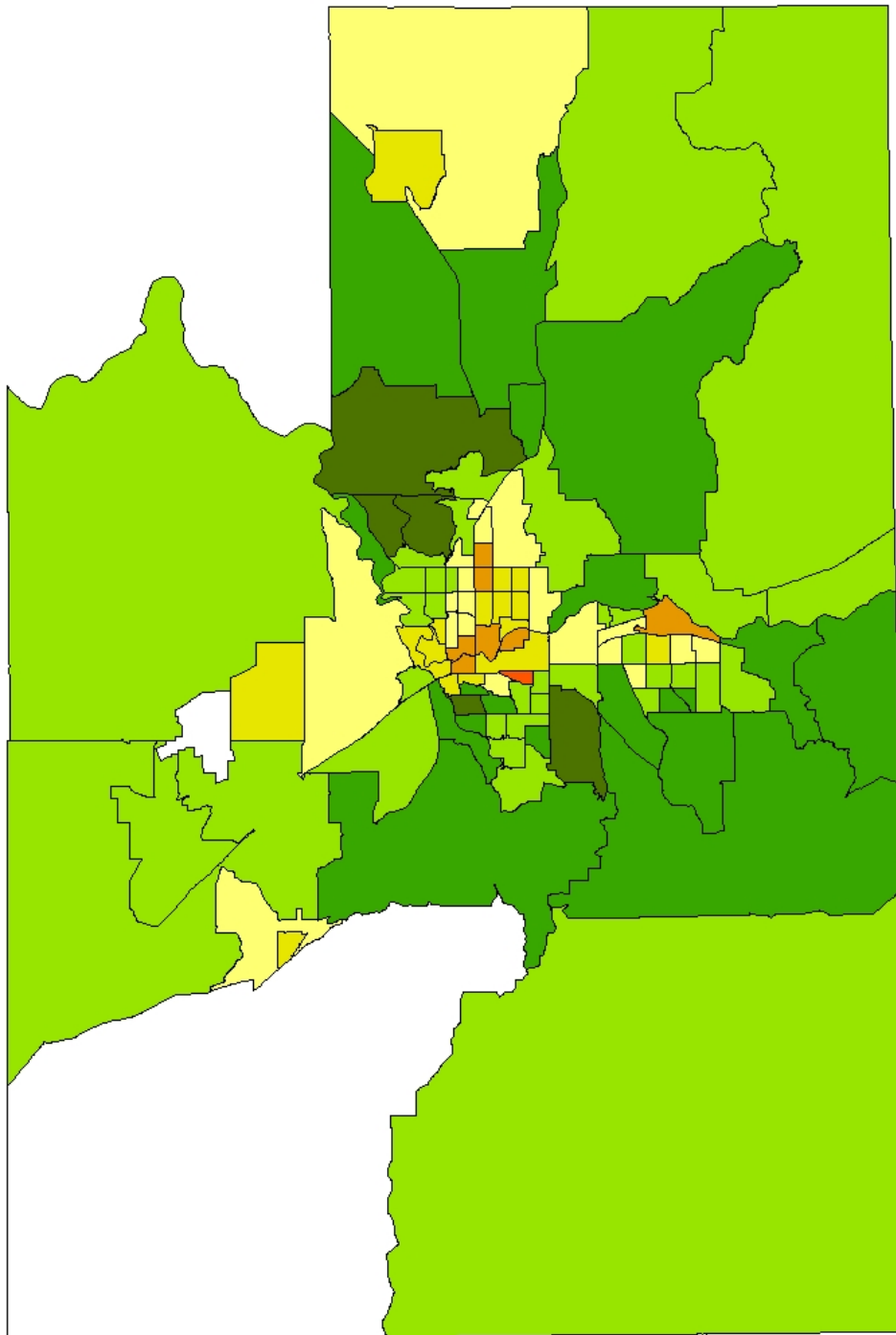
Spokane County

Share of the population living at or below 185% of the poverty level by census tract



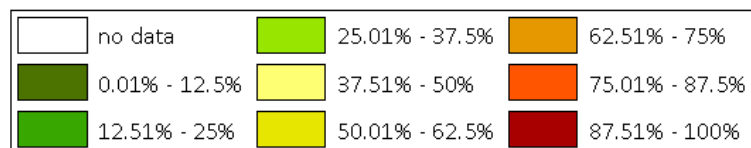
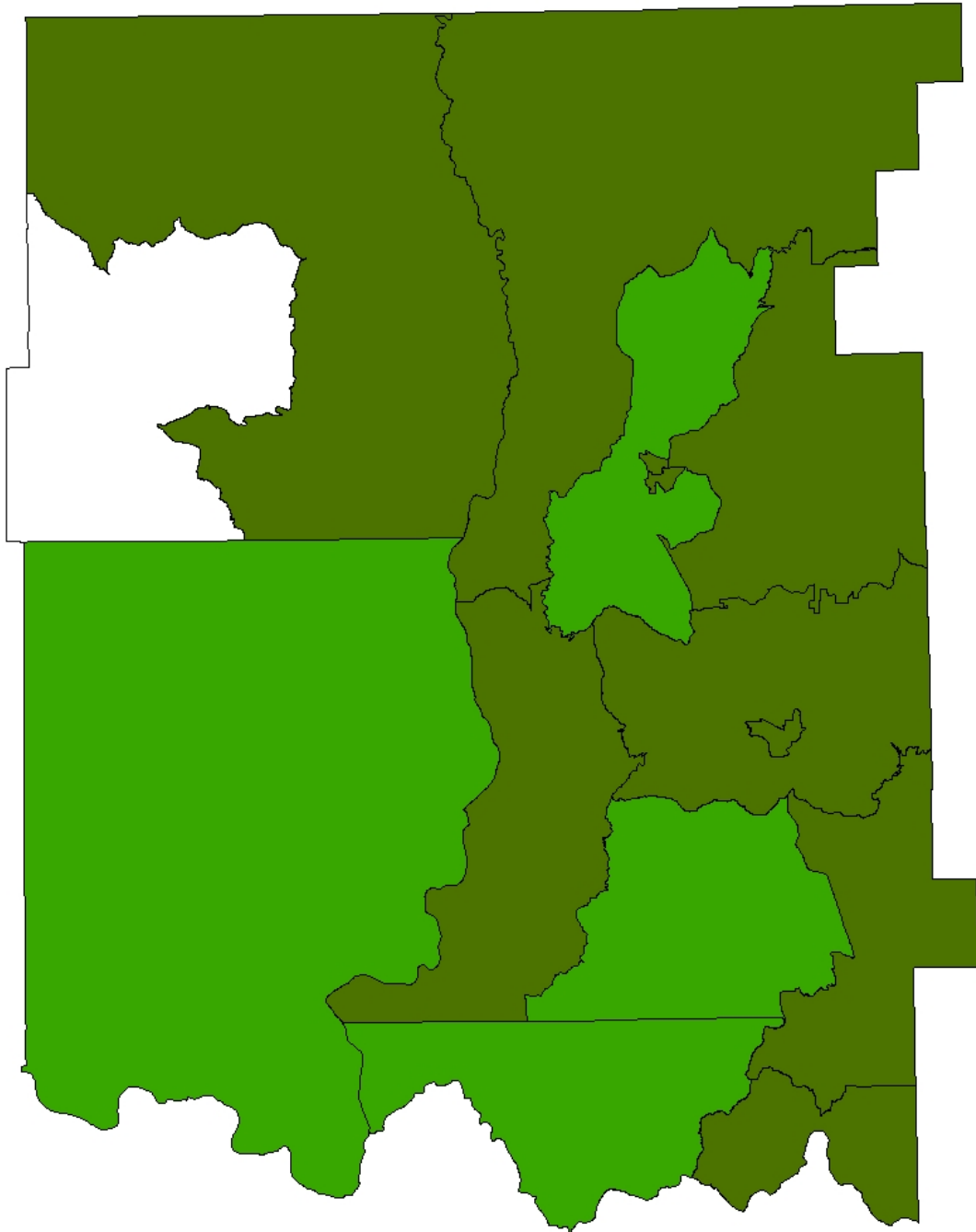
Spokane County

Share of the population living at or below 200% of the poverty level by census tract



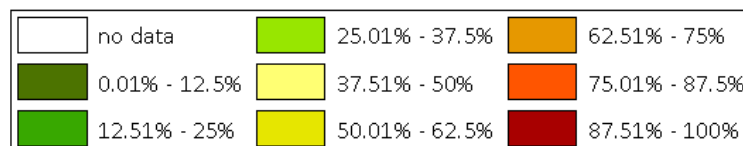
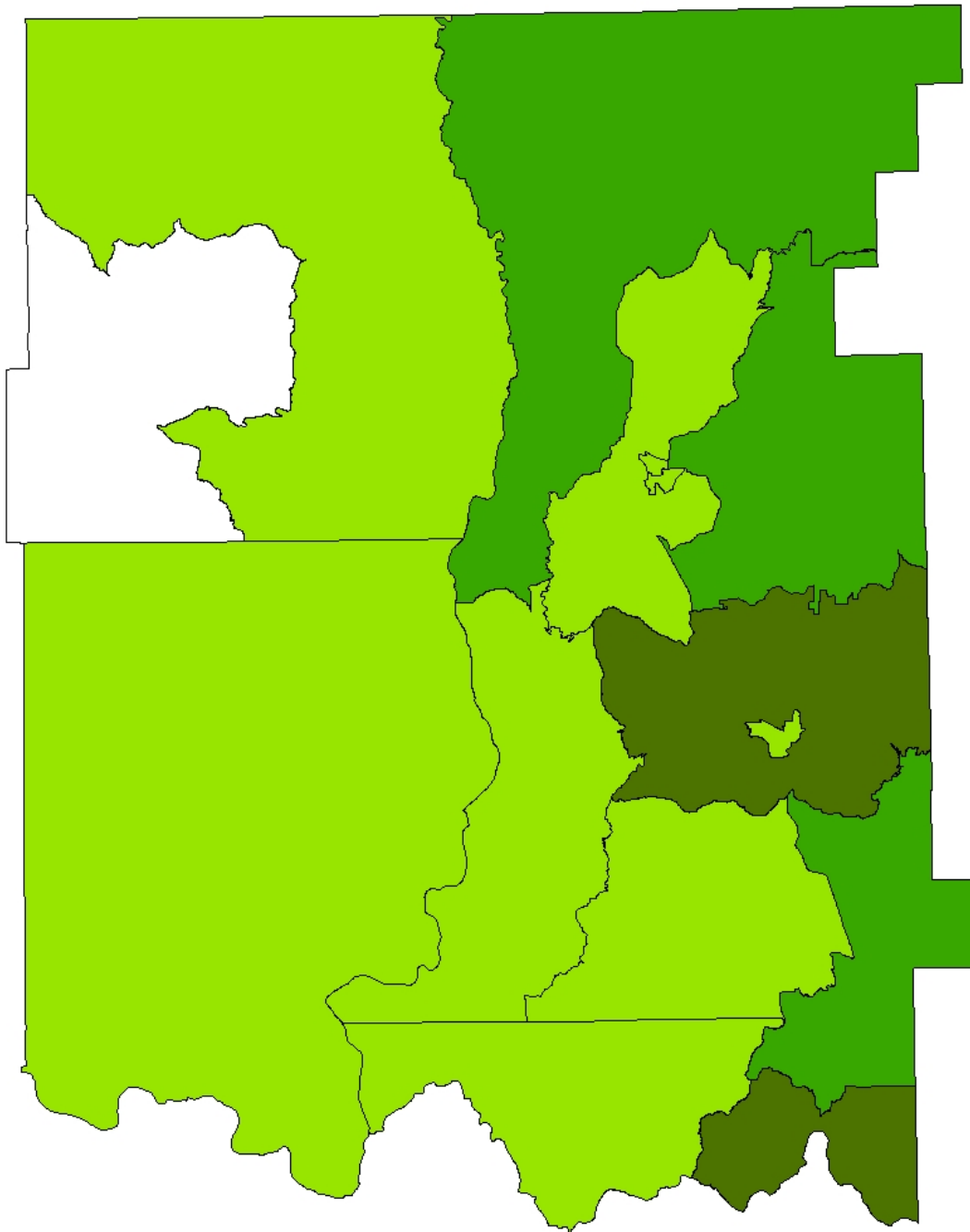
Ferry & Stevens Counties

Share of the population living at or below 50% of the poverty level by census tract



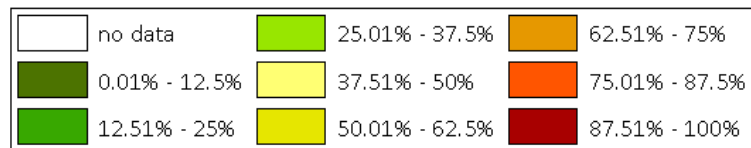
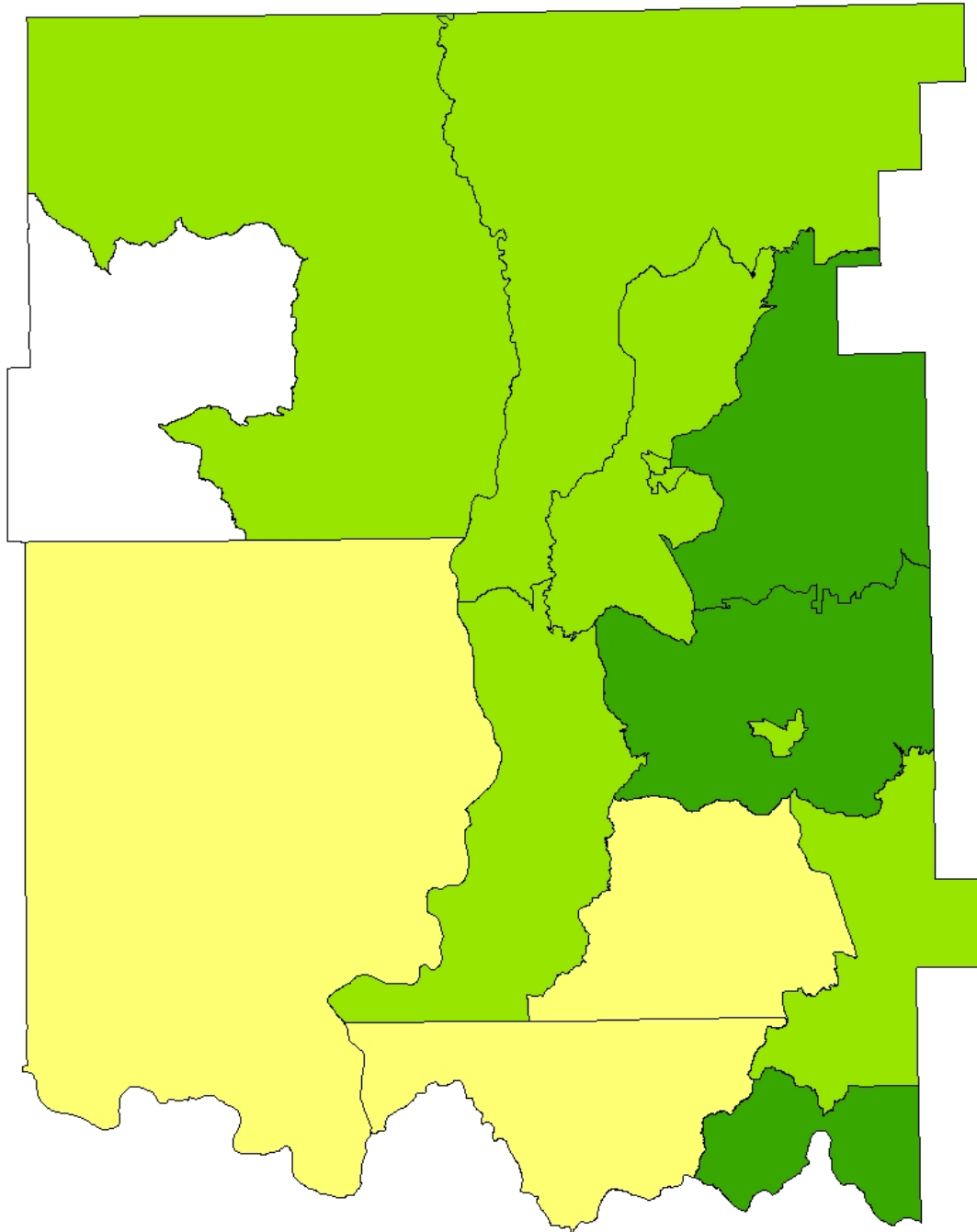
Ferry & Stevens Counties

Share of the population living at or below 125% of the poverty level by census tract



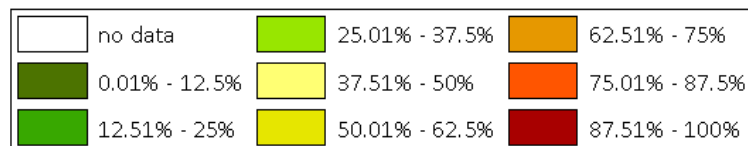
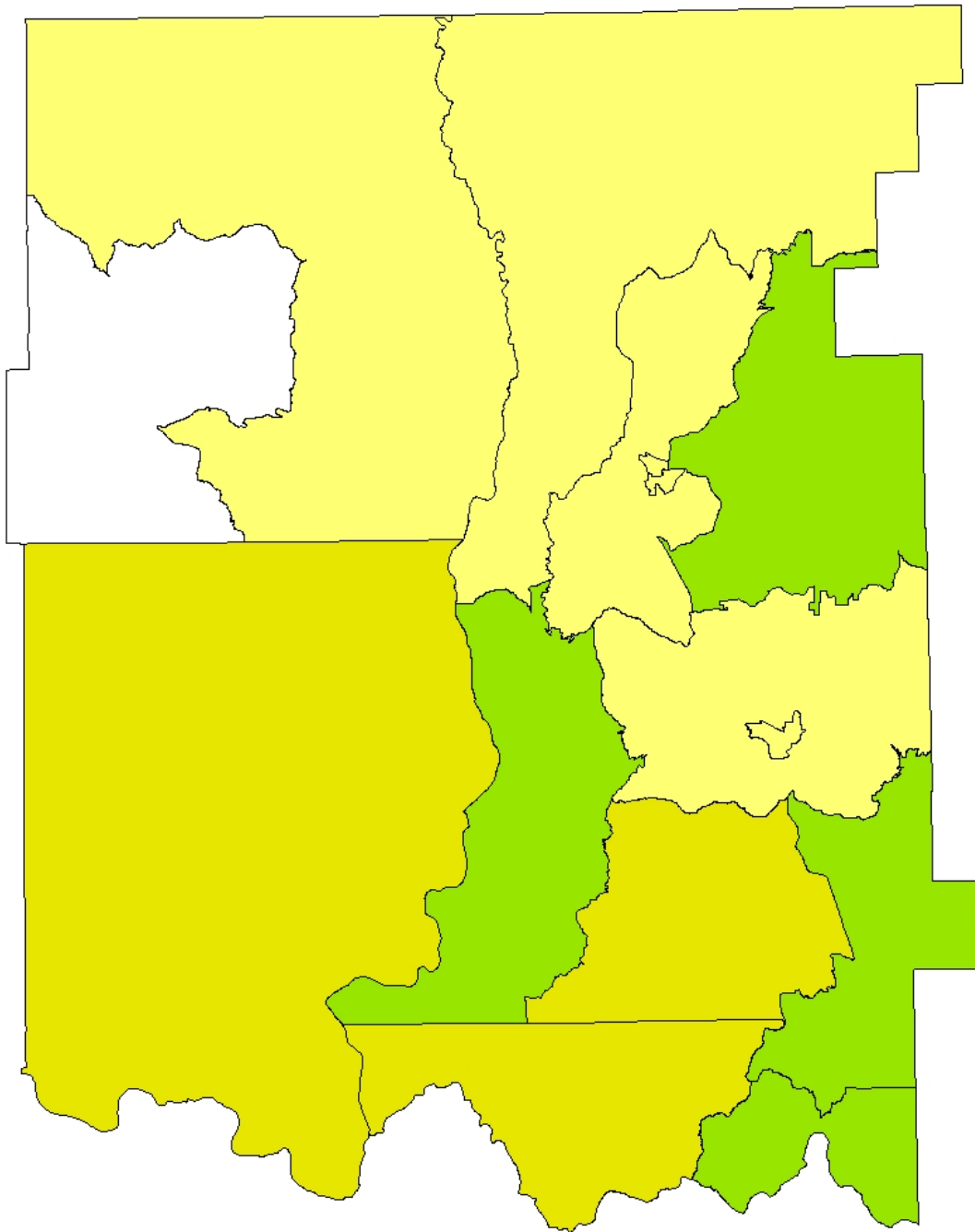
Ferry & Stevens Counties

Share of the population living at or below *150%* of the poverty level by census tract



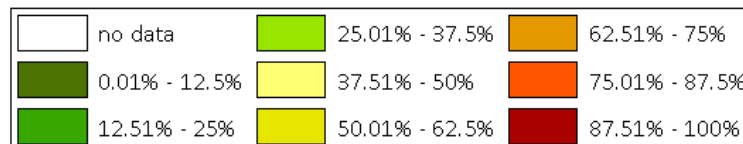
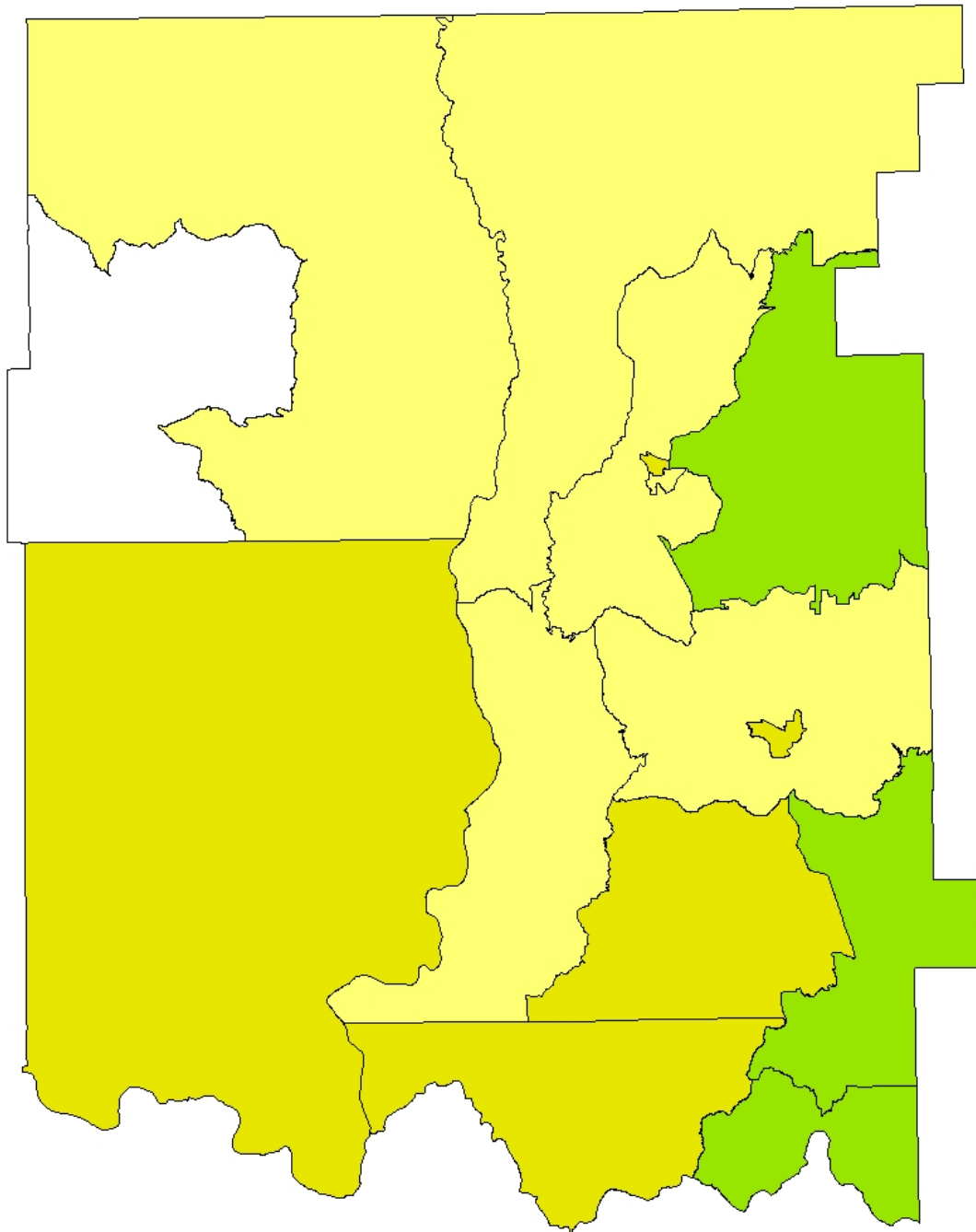
Ferry & Stevens Counties

Share of the population living at or below 185% of the poverty level by census tract



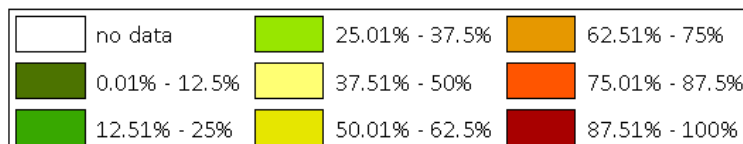
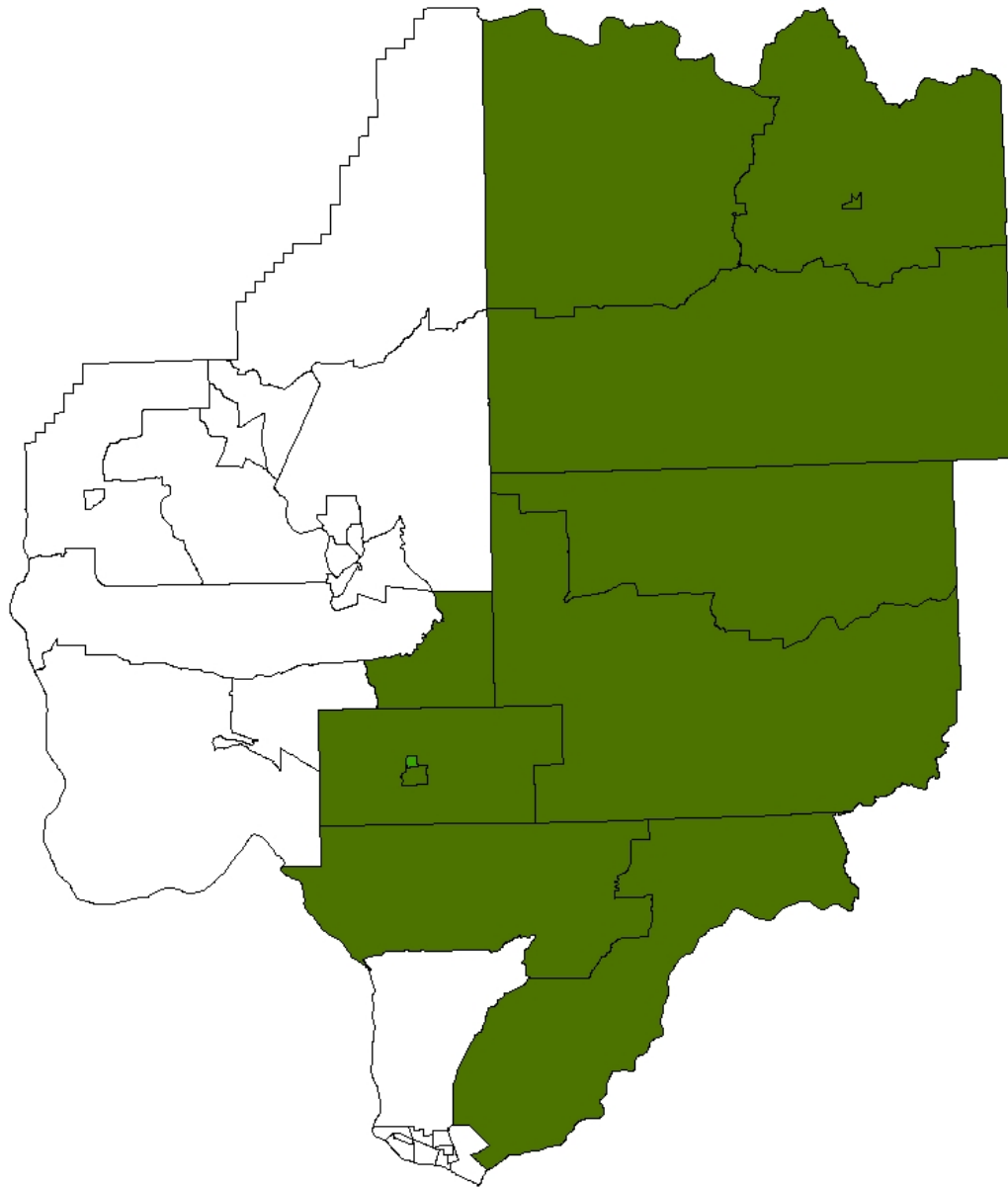
Ferry & Stevens Counties

Share of the population living at or below 200% of the poverty level by census tract



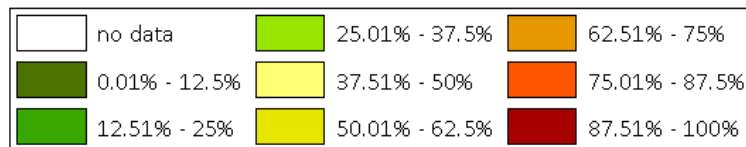
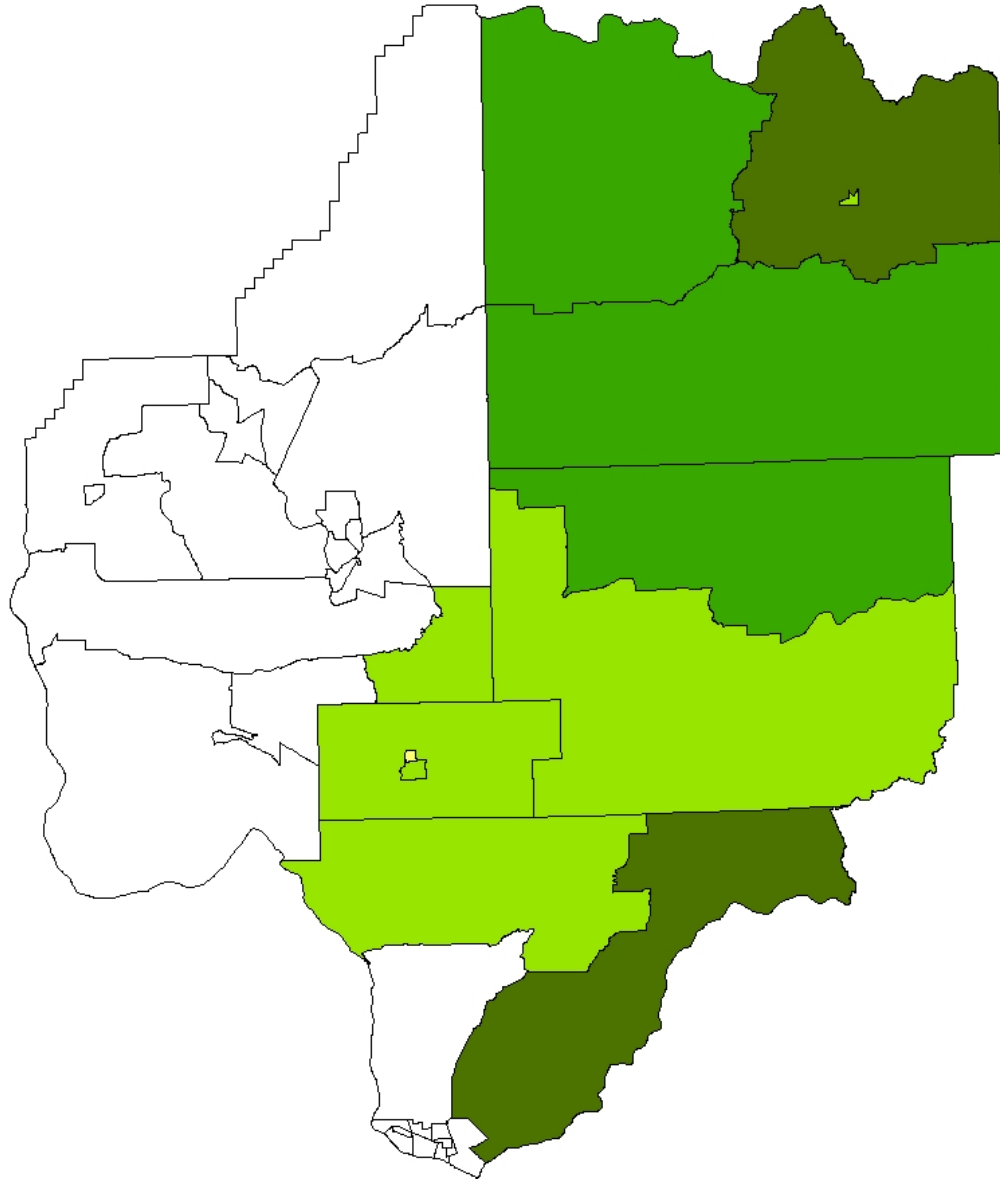
Adams, Franklin, Grant, & Lincoln Counties

Share of the population living at or below 50% of the poverty level by census tract



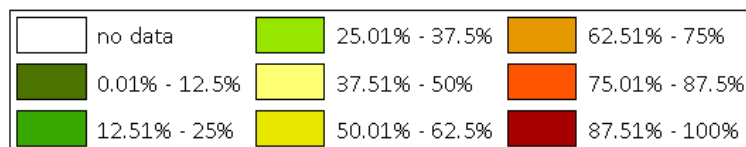
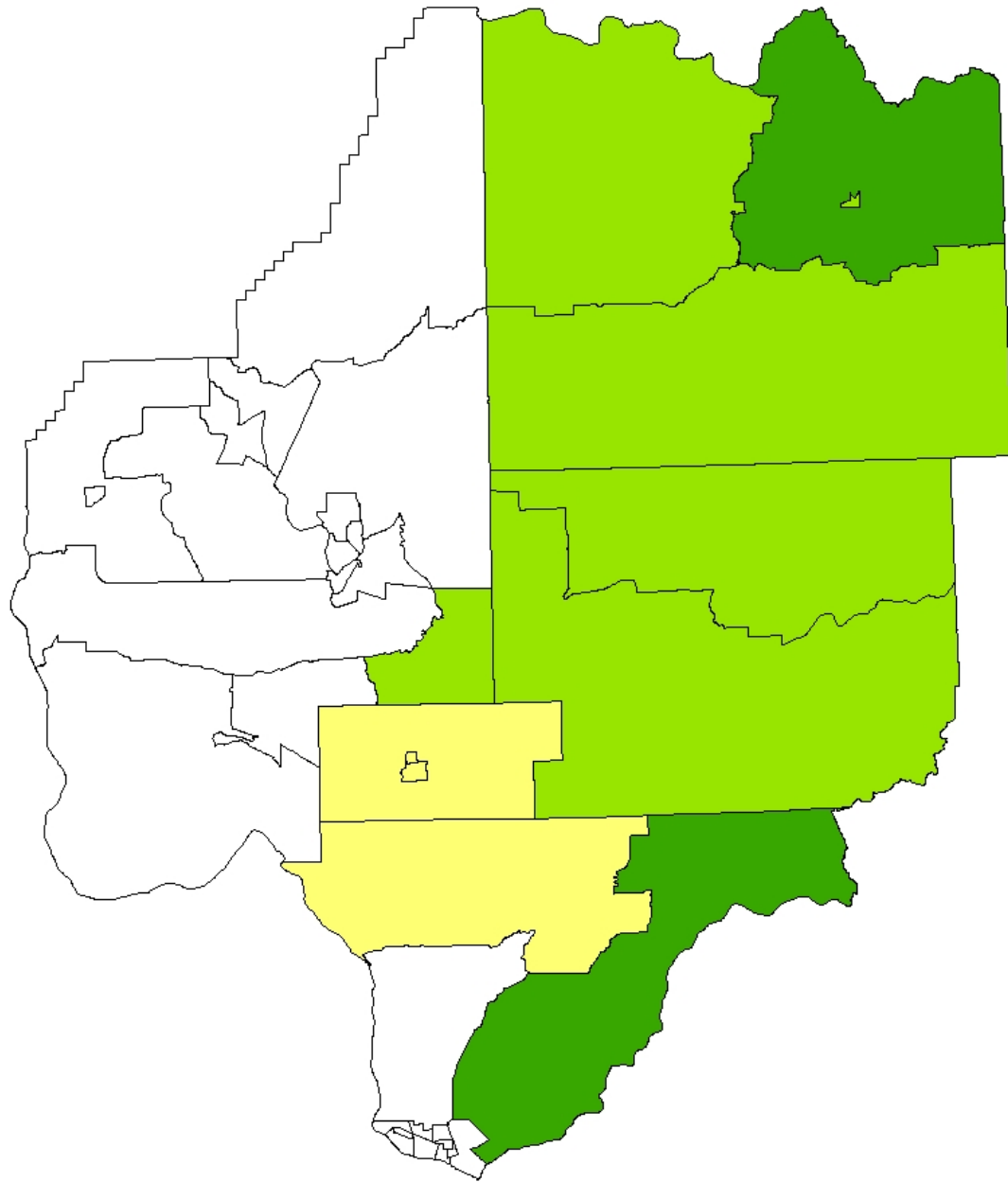
Adams, Franklin, Grant, & Lincoln Counties

Share of the population living at or below 125% of the poverty level by census tract



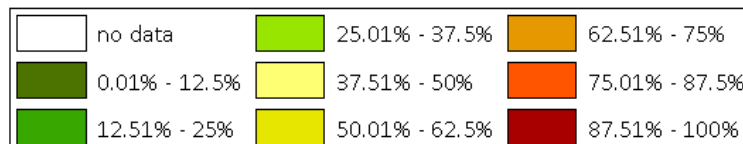
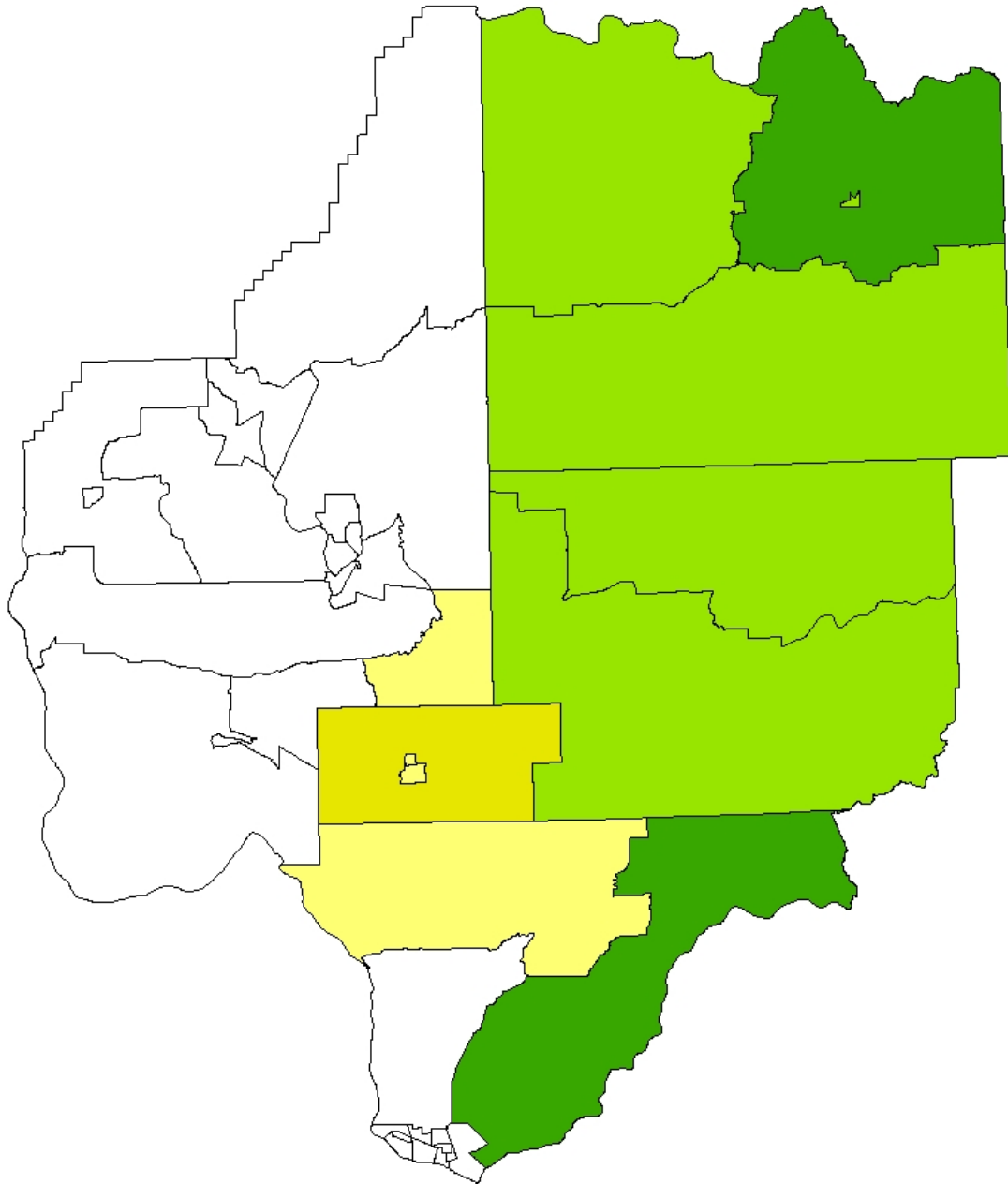
Adams, Franklin, Grant, & Lincoln Counties

Share of the population living at or below 150% of the poverty level by census tract



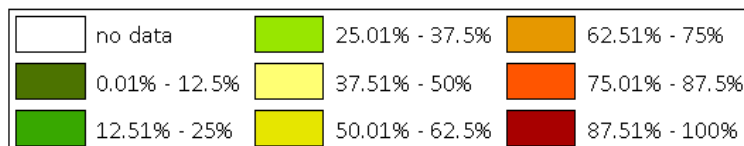
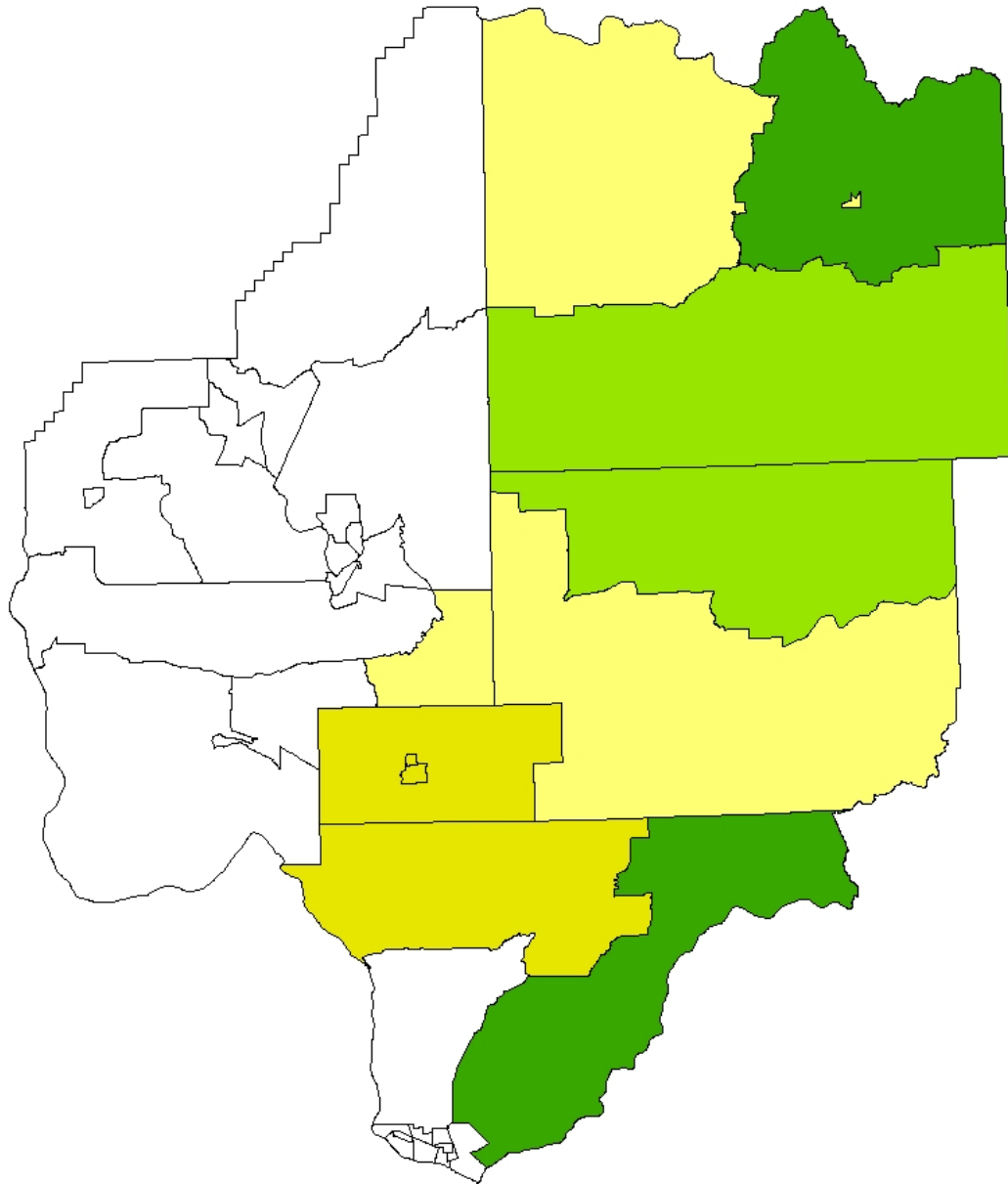
Adams, Franklin, Grant, & Lincoln Counties

Share of the population living at or below 185% of the poverty level by census tract



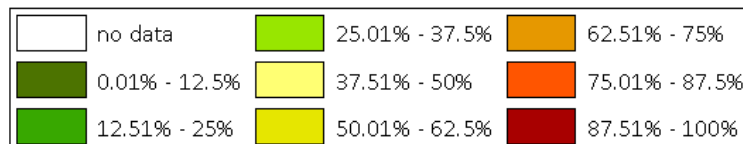
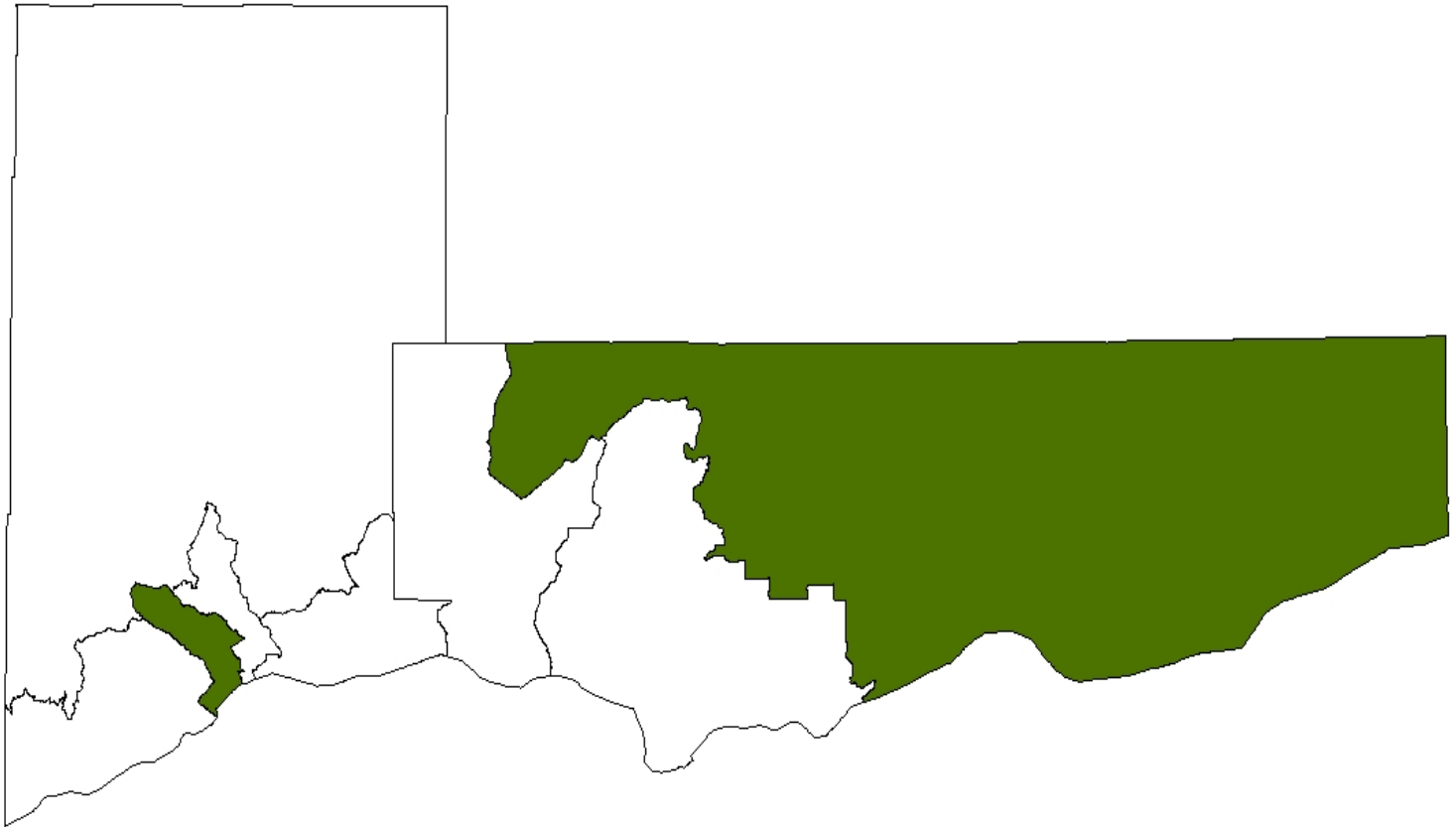
Adams, Franklin, Grant, & Lincoln Counties

Share of the population living at or below 200% of the poverty level by census tract



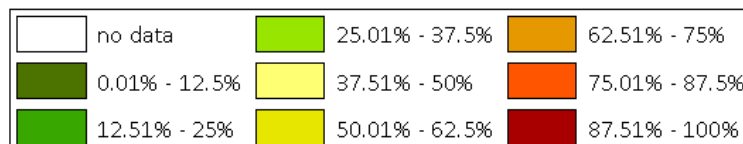
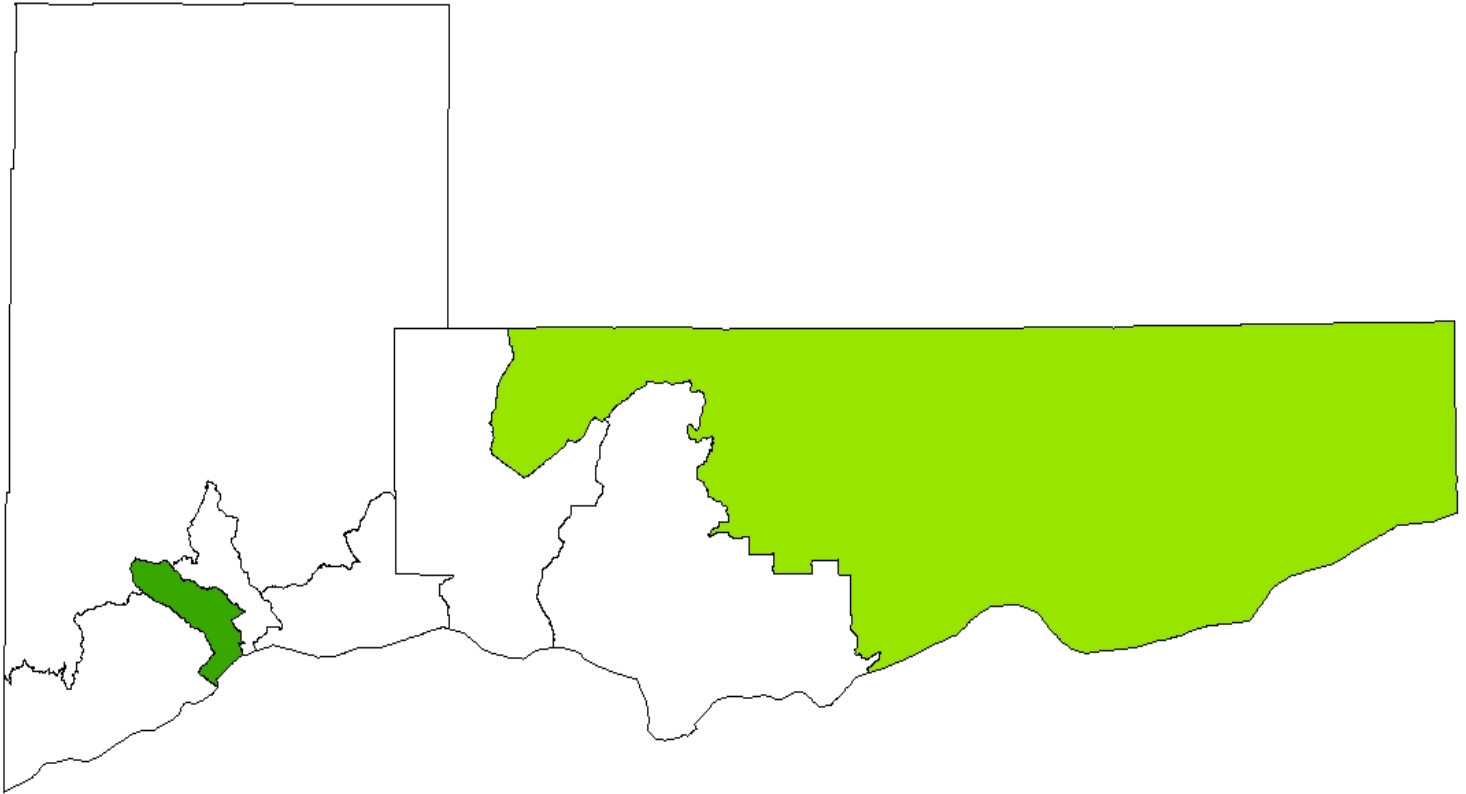
Klickitat & Skamania Counties:

Share of the population living at or below 50% of the poverty level by census tract



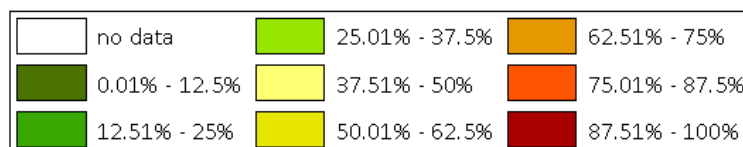
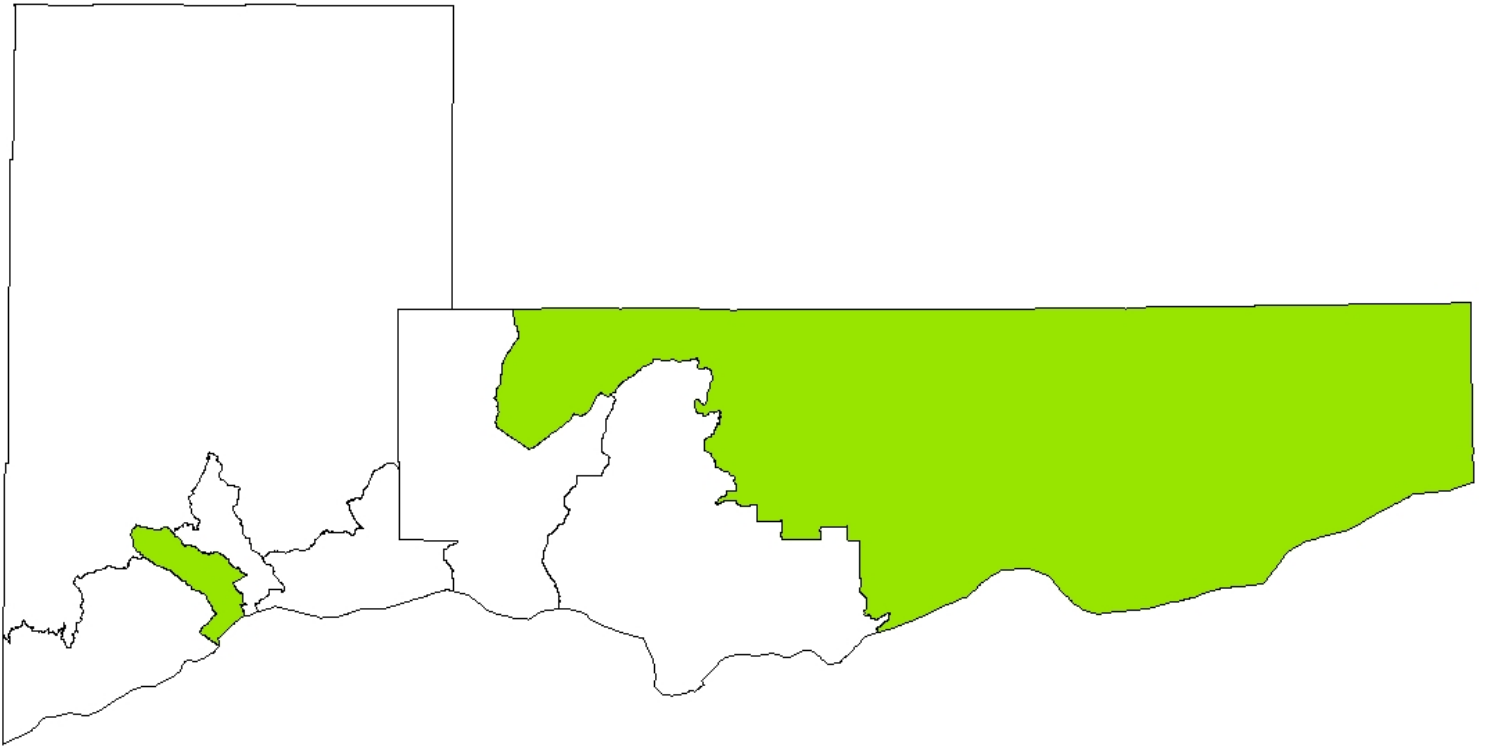
Klickitat & Skamania Counties:

Share of the population living at or below 125% of the poverty level by census tract



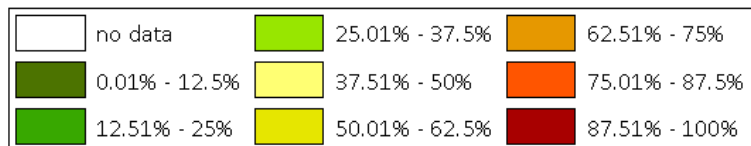
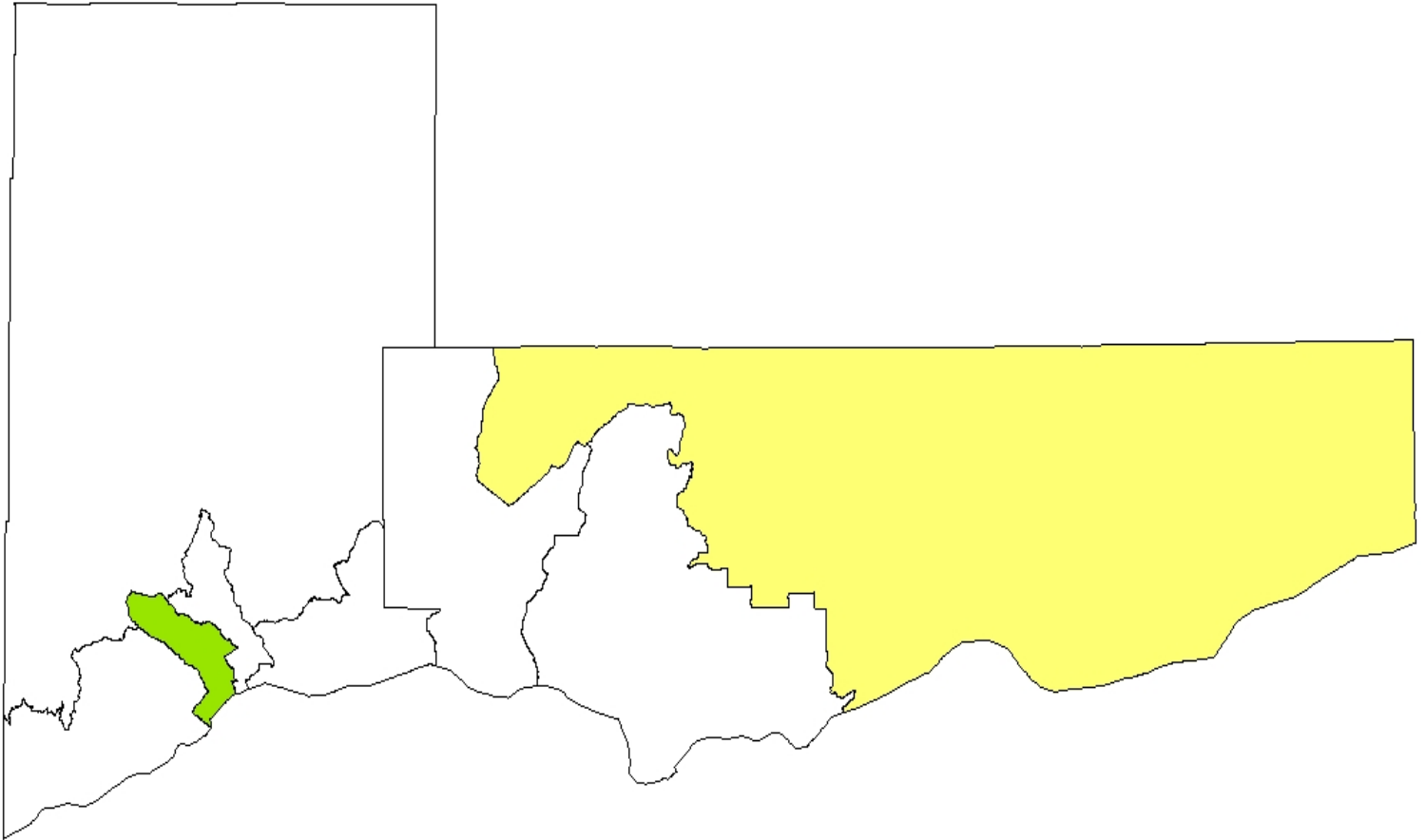
Klickitat & Skamania Counties

Share of the population living at or below *150%* of the poverty level by census tract



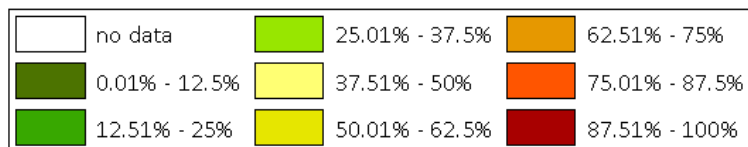
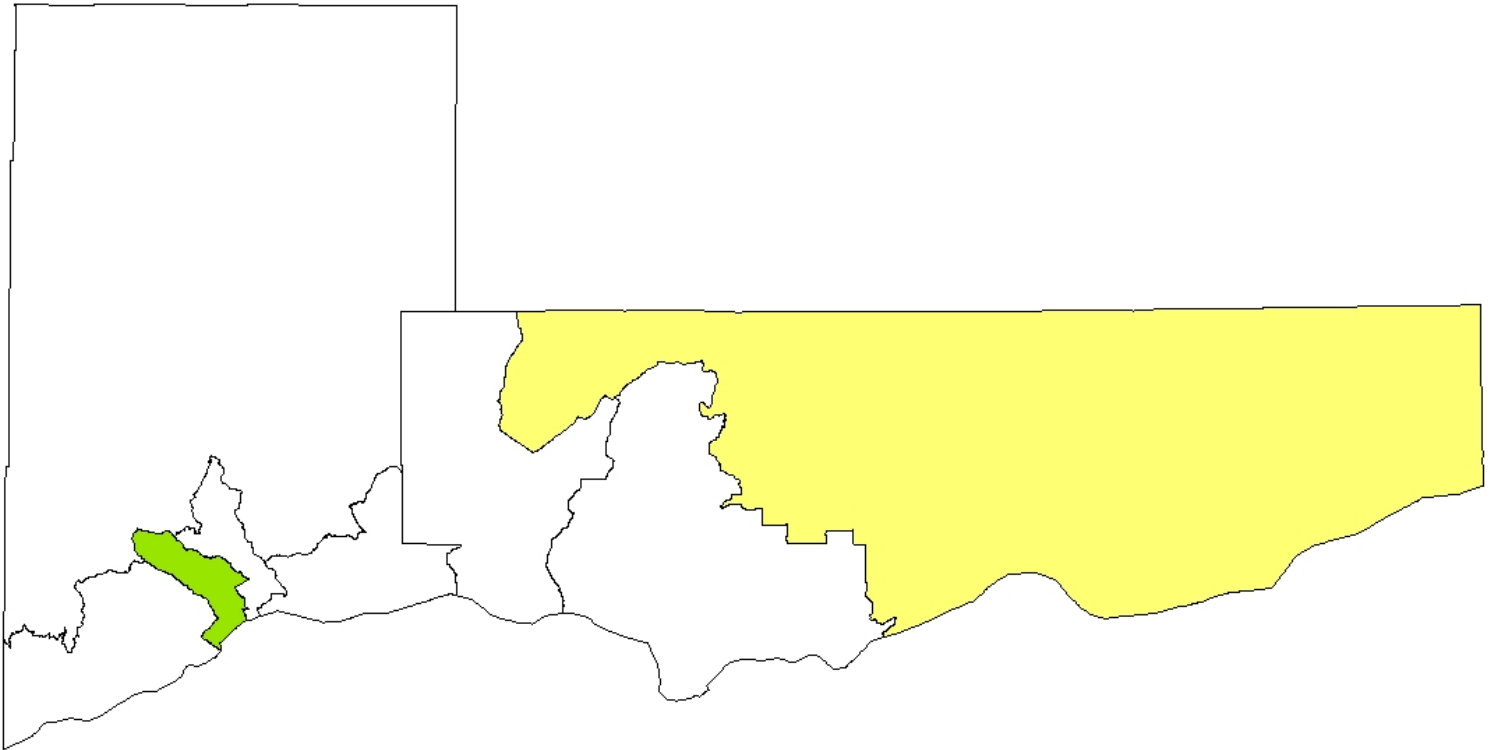
Klickitat & Skamania Counties

Share of the population living at or below 185% of the poverty level by census tract



Klickitat & Skamania Counties

Share of the population living at or below 200% of the poverty level by census tract



Appendix B.

Northern Counties by Avista Census Tract and Poverty Level

County	Census Tract	American Community Survey Estimated Households	Total Avista Customers	Estimated Avista Customers: 50% of Poverty Limit	Estimated Avista Customers: 125% of Poverty Limit	Estimated Avista Customers: 150% of Poverty Limit	Estimated Avista Customers: 185% of Poverty Limit	Estimated Avista Customers: 200% of Poverty Limit
Ferry	9400	637	862	112	276	386	453	482
Ferry	9701	1032	768	85	204	282	330	331
Stevens	9410	789	829	128	292	339	463	483
Stevens	9501	3289	4219	232	1041	1501	1685	1754
Stevens	9502	1470	1963	261	548	651	856	858
Stevens	9503	1253	1239	82	310	412	599	621
Stevens	9505	1024	1041	124	367	389	483	490
Stevens	9506	968	1461	113	270	274	396	396
Stevens	9507	1167	786	79	242	290	366	398
Stevens	9508	1290	1798	94	206	343	689	736
Stevens	9509	708	1102	76	281	353	412	434
Stevens	9511	1338	2000	257	553	784	1107	1122
Stevens	9513	1561	1960	80	335	506	619	710
Stevens	9514	2714	1574	59	151	269	405	409

Southern Counties by Avista Census Tract and Poverty Level

County	Census Tract	American Community Survey Estimated Households	Total Avista Customers	Estimated Avista Customers: 50% of Poverty Limit	Estimated Avista Customers: 125% of Poverty Limit	Estimated Avista Customers: 150% of Poverty Limit	Estimated Avista Customers: 185% of Poverty Limit	Estimated Avista Customers: 200% of Poverty Limit
Asotin	9601	1611	1487	66	173	281	396	413
Asotin	9602	1992	2166	19	132	185	323	441
Asotin	9603	1500	1628	131	498	591	784	842
Asotin	9604	951	999	66	268	327	431	480
Asotin	9605	1550	1475	67	493	547	701	738
Asotin	9606	1448	1539	44	271	335	467	574
Franklin	207	518	6	0	1	1	1	2
Franklin	208	2165	161	14	46	60	77	84
Klickitat	9501	3656	763	67	229	263	345	376
Skamania	9503	764	320	26	66	82	91	100

Central Counties by Avista Census Tract and Poverty Level

County	Census Tract	American Community Survey Estimated Households	Total Avista Customers	Estimated Avista Customers: 50% of Poverty Limit	Estimated Avista Customers: 125% of Poverty Limit	Estimated Avista Customers: 150% of Poverty Limit	Estimated Avista Customers: 185% of Poverty Limit	Estimated Avista Customers: 200% of Poverty Limit
Adams	9501	1013	879	54	211	236	325	329
Adams	9502	658	441	42	114	140	153	168
Adams	9503	1821	1218	126	384	499	621	743
Adams	9504	911	767	151	301	328	366	411
Adams	9505	1344	1235	145	415	489	580	659
Grant	113	1163	10	0	3	3	4	5
Lincoln	9601	740	745	46	208	213	275	312
Lincoln	9602	1239	618	12	73	96	148	151
Lincoln	9603	1119	967	68	203	257	323	387
Lincoln	9604	1365	1132	53	229	300	356	392
Whitman	1	1271	1388	779	1204	1230	1265	1272
Whitman	2	2602	2988	269	637	752	901	1014
Whitman	3	2061	2126	188	439	489	604	626
Whitman	4	1701	1645	241	445	473	539	552
Whitman	5	338	300	164	252	258	283	283
Whitman	6	3063	3845	1747	2811	3001	3239	3334
Whitman	7	1488	1528	96	254	336	465	477
Whitman	8	1531	1474	73	280	309	396	478
Whitman	9	1683	1486	54	259	363	515	572
Whitman	10	892	657	32	84	110	168	187

Spokane County by Avista Census Tract and Poverty Level

County	Census Tract	American Community Survey Estimated Households	Total Avista Customers	Estimated Avista Customers: 50% of Poverty Limit	Estimated Avista Customers: 125% of Poverty Limit	Estimated Avista Customers: 150% of Poverty Limit	Estimated Avista Customers: 185% of Poverty Limit	Estimated Avista Customers: 200% of Poverty Limit
Spokane	2	1937	1881	195	722	830	925	947
Spokane	3	1842	2114	212	841	1014	1242	1296
Spokane	4	1681	1759	154	770	854	1134	1166
Spokane	5	1379	1519	59	415	490	640	676
Spokane	6	1198	1278	24	171	254	342	390
Spokane	7	2041	2206	112	350	495	586	651
Spokane	8	1881	1959	86	279	433	550	623
Spokane	9	2360	2505	153	394	497	660	732
Spokane	10	2371	2452	116	335	476	603	665
Spokane	11	1466	1436	19	171	260	380	394
Spokane	12	892	983	64	264	381	432	446
Spokane	13	1576	1598	137	455	569	692	739
Spokane	14	2828	2723	252	910	1114	1410	1463
Spokane	15	1944	2191	140	610	756	1023	1116
Spokane	16	1352	1460	171	630	686	778	828
Spokane	18	1191	1207	84	321	432	562	706
Spokane	19	1385	1654	215	523	590	712	759
Spokane	20	1391	1942	253	614	693	836	892
Spokane	21	977	1079	113	450	495	548	548
Spokane	23	2027	2360	306	998	1106	1285	1341
Spokane	24	1055	1021	254	52	553	643	668
Spokane	25	2300	2136	619	1159	1193	1339	1401
Spokane	26	2162	2173	186	726	1170	1310	1408
Spokane	29	1284	1225	36	334	369	422	447
Spokane	30	954	1006	141	541	646	714	777
Spokane	31	1992	2046	362	703	737	796	796
Spokane	32	1584	1293	121	401	472	661	689
Spokane	35	1705	193	32	109	121	133	135
Spokane	36	2538	2605	482	976	1173	1328	1347
Spokane	38	861	939	54	233	249	328	349
Spokane	39	1012	1112	21	87	127	230	255
Spokane	40	2744	2822	398	991	1256	1442	1494
Spokane	41	1062	1022	32	123	147	176	219
Spokane	42	1913	2046	84	139	186	233	237
Spokane	43	1372	1458	62	115	161	216	222

Spokane County (continued) by Avista Census Tract and Poverty Level

County	Census Tract	American Community Survey Estimated Households	Total Avista Customers	Estimated Avista Customers: 50% of Poverty Limit	Estimated Avista Customers: 125% of Poverty Limit	Estimated Avista Customers: 150% of Poverty Limit	Estimated Avista Customers: 185% of Poverty Limit	Estimated Avista Customers: 200% of Poverty Limit
Spokane	44	1971	1982	142	303	341	461	567
Spokane	45	1495	1581	88	188	229	303	325
Spokane	46.01	1888	1678	129	336	396	488	515
Spokane	46.02	1114	1231	29	143	189	294	343
Spokane	47	2790	2734	207	417	520	626	848
Spokane	48	1590	1812	22	142	175	241	252
Spokane	49	2508	2476	157	300	401	649	683
Spokane	50	1802	1432	72	127	169	341	390
Spokane	101	2422	946	20	124	234	245	255
Spokane	102.01	1474	223	6	28	27	56	60
Spokane	102.02	2480	1716	35	135	208	229	263
Spokane	103.01	1581	1780	213	621	914	1076	1107
Spokane	103.03	1083	493	4	51	55	68	77
Spokane	103.04	2090	1174	35	198	225	417	440
Spokane	103.05	2049	2075	16	112	152	299	331
Spokane	104.01	1450	1328	155	462	526	619	687
Spokane	104.02	2548	876	10	120	182	234	235
Spokane	105.01	2998	3095	159	629	697	872	911
Spokane	105.03	2486	2587	69	164	195	276	315
Spokane	105.04	1274	985	15	93	116	149	161
Spokane	106.01	1350	1377	19	74	86	164	189
Spokane	106.02	2748	2909	27	197	208	307	307
Spokane	107	2101	2359	31	76	125	180	231
Spokane	108	937	858	101	258	293	338	368
Spokane	109	1499	1536	81	276	365	442	472
Spokane	110	1487	1478	62	272	383	521	555
Spokane	111.01	2627	2456	556	1120	1278	1444	1536
Spokane	111.02	1522	1430	78	474	527	620	631
Spokane	112.01	3453	3267	256	694	880	1321	1441
Spokane	112.02	1626	1569	90	308	375	508	560
Spokane	113	2934	3180	189	328	424	611	655
Spokane	114	2132	2185	74	332	369	541	592
Spokane	115	592	631	37	129	147	225	228
Spokane	116	755	800	66	139	188	227	269

Spokane County (continued) by Avista Census Tract and Poverty Level

County	Census Tract	American Community Survey Estimated Households	Total Avista Customers	Estimated Avista Customers: 50% of Poverty Limit	Estimated Avista Customers: 125% of Poverty Limit	Estimated Avista Customers: 150% of Poverty Limit	Estimated Avista Customers: 185% of Poverty Limit	Estimated Avista Customers: 200% of Poverty Limit
Spokane	117.01	1000	784	123	219	272	328	361
Spokane	117.02	2457	2540	415	1031	1159	1596	1627
Spokane	118	2262	564	53	188	208	261	264
Spokane	119	1753	796	91	285	303	413	422
Spokane	120	1787	986	60	153	192	310	353
Spokane	121	1127	1199	200	407	438	491	544
Spokane	122	988	1055	28	124	172	464	499
Spokane	123	2317	2589	192	686	761	867	959
Spokane	124.01	1626	1726	47	149	211	285	316
Spokane	124.02	2240	1879	25	161	209	262	268
Spokane	125	1509	1240	96	251	313	389	473
Spokane	126	1552	1072	77	146	215	340	362
Spokane	127.01	1618	763	12	128	191	252	266
Spokane	127.02	813	612	10	45	48	78	81
Spokane	128.01	1556	1619	75	197	256	328	362
Spokane	128.02	1266	1196	31	104	225	266	351
Spokane	129.01	1211	683	62	183	231	249	312
Spokane	129.02	2527	1535	67	188	314	376	428
Spokane	130	2721	1856	119	305	369	432	494
Spokane	131	3864	4675	104	553	603	769	866
Spokane	132.01	2838	2895	138	374	413	835	925
Spokane	132.02	3497	4055	95	229	460	610	619
Spokane	133	958	454	12	28	38	53	66
Spokane	134.01	1743	1913	37	63	87	142	172
Spokane	135	3082	2075	14	128	214	276	284
Spokane	136	1685	1439	74	242	301	334	411
Spokane	137	1509	1137	106	189	292	414	455
Spokane	139	1929	1926	71	314	417	599	660
Spokane	140.01	1810	460	117	217	237	263	271
Spokane	140.02	1949	650	139	260	277	312	317
Spokane	141	2164	1549	56	211	319	379	406
Spokane	143	1186	993	42	175	229	321	372
Spokane	144	1752	1850	72	379	566	754	816
Spokane	145	846	880	138	475	489	529	531