**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:

 For Avista: For Public Counsel:

 David J. Meyer, Esq. Lisa W. Gafken

 Vice President and Chief Counsel Office of The Attorney General

 Regulatory & Governmental Affairs Public Counsel Unit

 Avista Corp. 800 5th Ave, Suite 2000

 P. O. Box 3727 Seattle, WA 98104-3188

 1411 E. Mission Avenue, MSC 13 Email : lisa.gafken@atg.wa.gov

 Spokane, Washington 99220-3727

 E-mail: david.meyer@avistacorp.com

 For Commission Staff: For NWIGU:

 Brett Shearer Edward A. Finklea

 Washington Utilities and Transportation Executive Director

 Commission Northwest Industrial Gas Users

 P.O. Box 40128 326 Fifth Street

 Olympia, WA 98504-0128 Lake Oswego, OR 97034

 Email: bshearer@utc.wa.gov Email: efinklea@nwigu.org

 For Energy Project: For ICNU:

 Ronald Roseman Melinda Davison

 Attorney at Law Davison Van Cleve, P.C.

 2011 14th Avenue East 333 S.W. Taylor, Suite 400

 Seattle, WA 98112 Portland, OR 97204

 Email: ronaldroseman@comcast.net Email: mjd@dvclaw.com

**II. BACKGROUND**

1. 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]](#footnote-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]](#footnote-2)
* LIRAP Heat - mimics the LIHEAP program in terms of income eligibility, intake[[3]](#footnote-3) requirements, and benefit calculation.
* LIRAP Share Emergency[[4]](#footnote-4) - 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

1. In the Company’s 2014 general rate case,[[5]](#footnote-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]](#footnote-6) held their first meeting via telephone on December 19, 2014, then followed with six face-to-face all day workshops,[[7]](#footnote-7) along with several planning conference calls from January 30 through May 1, 2015.
2. The following four goals were informed by the Commission’s order in this case,[[8]](#footnote-8) and guided the program modifications and additions ultimately agreed to by the Workgroup:
	* 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.
3. 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.
4. 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**

1. 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:
2. **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.
	1. Proposed Modification - Funding for LIRAP will be allocated as a fixed annual budget, rather than collected and allocated on a month-to-month basis.
	2. Proposed Modification - Avista will inform each Agency of its fixed annual budget allocation by the end of May each year.
	3. 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.
		1. Avista will make an annual filing by August 1st of each year, with a requested effective date of October 1st.
		2. 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.
		3. Any funds unspent by the end of a program year will remain available for the next program year.
3. **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.
	1. 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.
		1. Total LIRAP expenditures must not exceed annual contract amount.
		2. LIRAP direct service and non-direct services funding must be spent proportionately as agreed to in each agency’s annual contract with Avista.
	2. 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.
		1. LIRAP Heat grant amounts will still be calculated based on heating costs, rather than year-round energy costs.
4. **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.
	* + - 1. Proposed Modification - Avista will establish an ongoing energy assistance program advisory group to monitor and explore ways to improve the program.
		1. 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.
		2. The energy assistance advisory groups will hold at least two meetings per year.
		3. Membership
			+ 1. 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.
				2. The governance structure and meeting processes will be determined at the outset of the advisory group.
				3. 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.
5. **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.
	* + 1. 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**

1. 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.
2. 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]](#footnote-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**

1. 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.
2. **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.
3. **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]](#footnote-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.
4. **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.
5. **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 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.
6. **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:
	1. Whether the rate discount has significantly different impacts on participant disconnection rates compared to the existing LIRAP Senior Energy Outreach program.
	2. The impact of the rate discount on participant energy burden, compared to the existing LIRAP Senior Energy Outreach program.
	3. 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.
	4. Participant reactions to the pilot and the reasons customers chose one program verses the other given the choice of a discount instead of a grant through the existing LIRAP Senior Energy Outreach program.
	5. 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.
	6. The effectiveness of outreach methods.
	7. Actual customer benefits compared to pilot expectations.
	8. Recommended improvements to the pilot.
7. 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**

1. 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.
2. 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



1. 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:
2. The Northwest Industrial Gas Users have agreed that Schedule 146, Transportation Service for Customer-owned Gas,[[11]](#footnote-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.
3. 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 $113,238 effective October 1, 2015.[[12]](#footnote-12) The recovery of those funds from current Schedule 192 contributors would be on a uniform percentage of margin basis.
4. 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]](#footnote-13)
5. 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.
6. 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]](#footnote-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**

1. Beyond the proposed modifications to the existing LIRAP program and the proposed Senior/Disabled Rate Discount Pilot, the Workgroup investigated two other potential additions 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]](#footnote-15)
2. 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.
3. 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.
4. 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 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]](#footnote-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.
5. 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?

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?
1. 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**

1. 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.
2. 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 is this petition. We believe these changes all meet the goals the Commission listed in Order 05 of this case. With that, **t**he 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: \_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_ By: \_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_

 David Meyer Ron Roseman

 Avista Corp. Energy Project

 By: \_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_ By: \_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_

 Brett Shearer Melinda Davison

 Commission Staff ICNU

 By: \_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_ By: \_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_

 Lisa Gafken Chad Stokes

 Public Counsel NWIGU

# VERIFICATION

 STATE OF WASHINGTON )

 )

 County of Spokane )

 Kelly O. Norwood, being first duly sworn on oath, deposes and says: That he is a Vice President of Avista Corporation and makes this verification for and on behalf of said corporation, being thereto duly authorized;

 That he has read the foregoing Petition, knows the contents thereof, and believes the

same to be true.

 SIGNED AND SWORN to before me on this 29th day of May 2015

NOTARY PUBLIC in and for the State of
Washington, residing at Spokane.

Commission Expires:

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. [↑](#footnote-ref-1)
2. Attached as Attachment A is a diagram of Avista’s Low-Income Energy Assistance programs. [↑](#footnote-ref-2)
3. LIRAP intake is a process established to screen, acquire and record all mandatory household documentation to determine qualifications for heating assistance. [↑](#footnote-ref-3)
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. [↑](#footnote-ref-4)
5. Dockets UE-140188 and UG-140189 (consolidated). [↑](#footnote-ref-5)
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. [↑](#footnote-ref-6)
7. Meeting Agendas and Minutes are provided as Attachment B. [↑](#footnote-ref-7)
8. Dockets UE-140188 and UG-140189 (consolidated), Order 05, ¶ 39 (Nov. 25, 2014). [↑](#footnote-ref-8)
9. Disabled customers with household income above 125 percent of FPL are not currently eligible for the existing LIRAP Senior program. [↑](#footnote-ref-9)
10. Intake period runs annually from October 1, through September 30. [↑](#footnote-ref-10)
11. Transportation Service customers taking service under Schedule 146 have not contributed funding to LIRAP since the program began in 2001. [↑](#footnote-ref-11)
12. Calculation - 34.925% \* $324,230 = $113,238. [↑](#footnote-ref-12)
13. For Schedule 25, the recovery of LIRAP funding applicable to that schedule occurs in the first two volumetric blocks. [↑](#footnote-ref-13)
14. Dockets UE-150204 and UG-150205 (consolidated). [↑](#footnote-ref-14)
15. “An Estimate of the Number of Households in Poverty Served by Avista Utilities in Washington State,” dated May, 2015. Provided as Attachment D. [↑](#footnote-ref-15)
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.” [↑](#footnote-ref-16)