

**EXH. BDJ-3r
DOCKETS UE-240004/UG-240005
2024 PSE GENERAL RATE CASE
WITNESS: BIRUD D. JHAVERI**

**BEFORE THE
WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION**

**WASHINGTON UTILITIES AND
TRANSPORTATION COMMISSION,**

Complainant,

v.

PUGET SOUND ENERGY,

Respondent.

**Docket UE-240004
Docket UG-240005**

**SECOND EXHIBIT (NONCONFIDENTIAL) TO THE
PREFILED DIRECT TESTIMONY OF**

BIRUD D. JHAVERI

ON BEHALF OF PUGET SOUND ENERGY

**REVISED
MARCH 4, 2024**

FEBRUARY 15, 2024

2022 Energy Burden Analysis (“EBA”) results



For 2022 Calendar Year

Puget Sound Energy (PSE) 2024 General Rate Case (GRC) (Dockets UE-240004/UG-240005)
Exhibit BDJ-3 to Prefiled Direct Testimony of Birud D. Jhaveri BDJ-1T

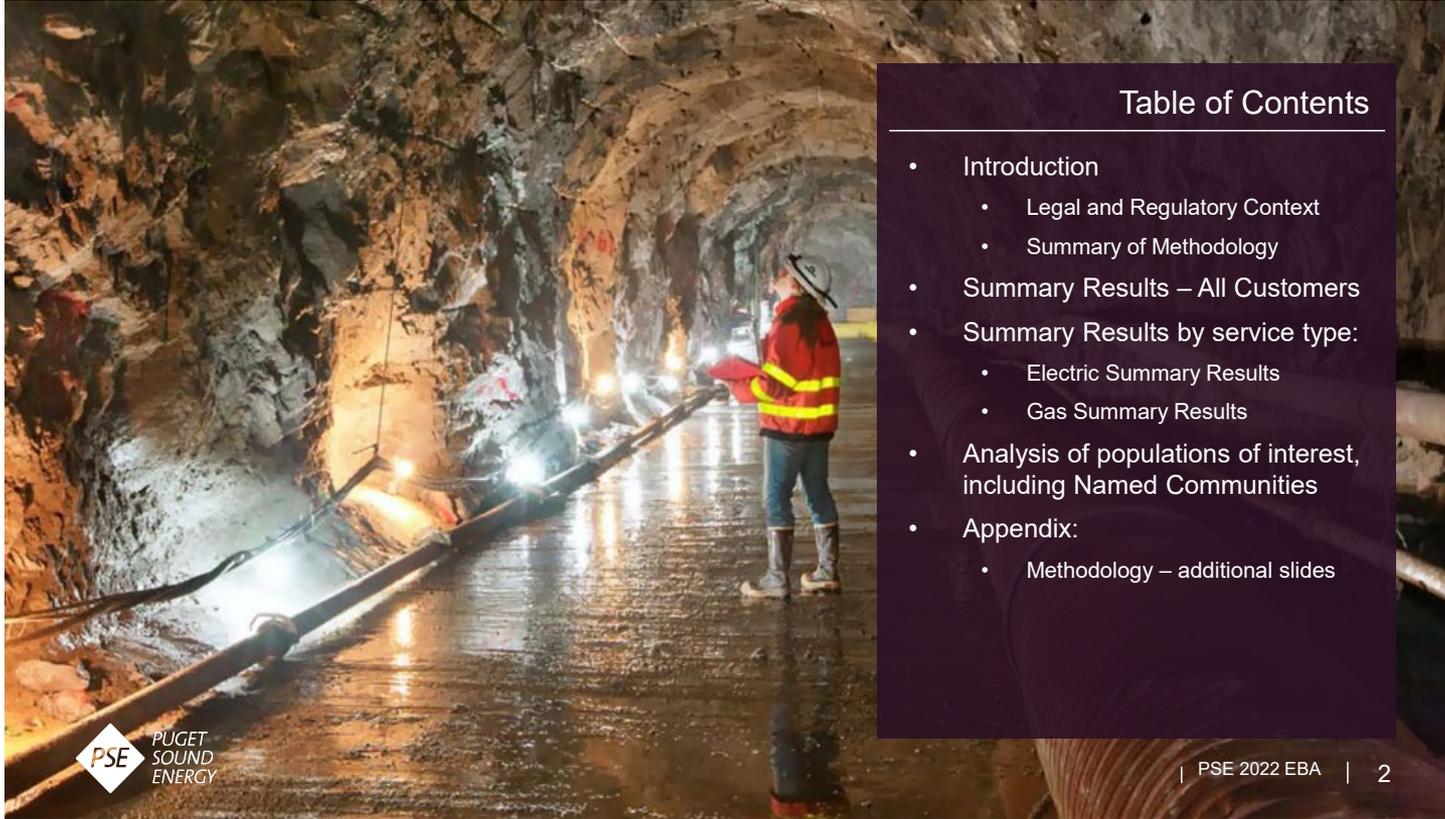


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Introduction

Legal and Regulatory Context

PSE conducted the EBA pursuant RCW 19.405.120

- PSE conducted its first energy burden analysis in 2020 to comply with RCW 19.405.120 (2019 Clean Energy Transformation Act (CETA) Section 120, Energy assistance for low-income households) which requires that:
 - all Washington electric utilities must provide energy assistance funding and programs to low-income households by July 31, 2021 (“*to the extent practicable, priority must be given to low-income households with a higher energy burden*”);
 - all Washington electric utilities are required to assess energy assistance available to low-income households across the state, the energy burden of low-income households, and the need for more assistance, and provide their findings to the Washington State Department of Commerce (“Commerce”).
 - Commerce is required to compile and aggregate these data and to publish biennial reports.

About PSE's Energy Burden Analysis (EBA)

- Allows PSE to estimate the number of PSE's low-income (LI) customers, their respective energy burdens, and energy assistance need (EAN).
- Has served to analyze and better understand some of the shared characteristics of low-income, the higher energy-burdened customers, as well as highly impacted communities, vulnerable customers, and electric deepest need.
- Has allowed PSE to design and target products and energy assistance to better address the needs of its customers that are most in need of energy assistance.
- Has become an integral part of key reporting requirements by PSE (see next slide).

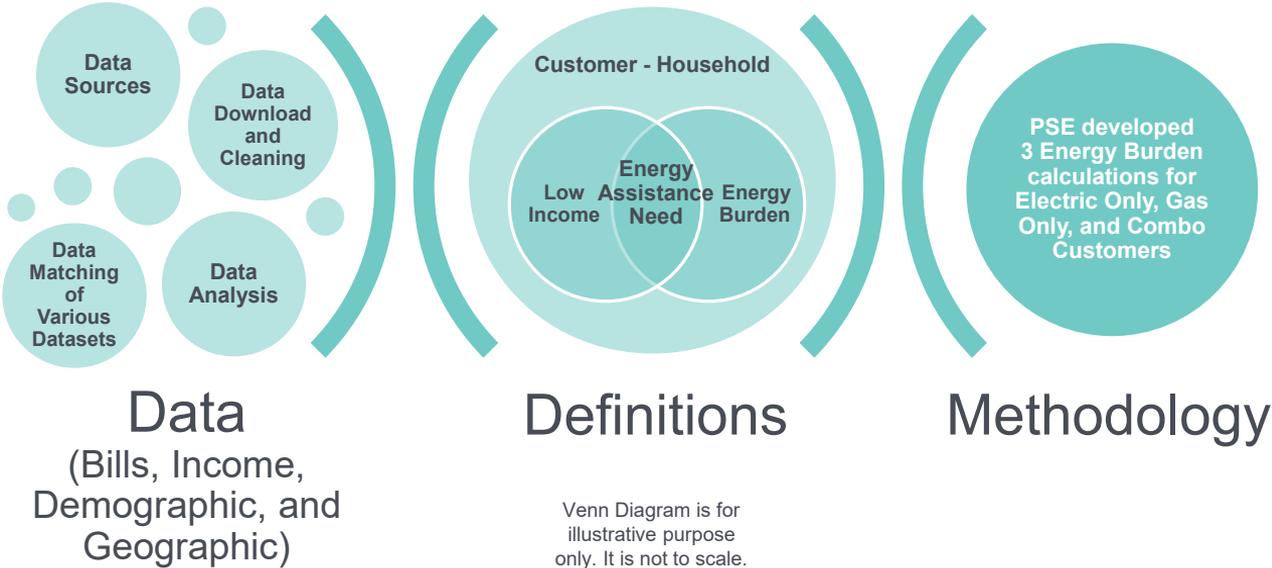
PSE's energy burden analysis results are now an integral for many critical reporting requirements

- **Clean Energy Transformation Act (CETA):**
 - RCW 19.405.120 biannual Commerce reports
 - Clean Energy Implementation Plans (CEIP) benefits metrics and CEIP annual progress reports
 - CEIP implementation: 30% to named communities
- **PSE's General Rate Cases (GRC):**
 - **2022 GRC - 2023-2024 Multi-Year Rate Plan (MYRP):**
 - Residential Electric Block Study.
 - Bill Discount Rate development.
 - 2020 Energy Burden Analysis Report.
 - **2022 GRC (2023-2024 MYRP) Compliance:**
 - Annual MYRP reports: affordability and energy burden data
- **CEM (Customer Energy Management)** for 2024-2025 Biennial conservation plan (BCP)
- **RCW 80.28.068** PSE's new Bill Discount Rates (BDR)

Introduction

Summary of methodology and definitions

Energy Burden Analysis Overview



Venn Diagram is for illustrative purpose only. It is not to scale.

Key Definitions

- **RCW 19.405.020 CETA (2019) Definitions:**
 - Section (15) "**Energy assistance**" means a program undertaken by a utility to reduce the household energy burden of its customers.
 - Section (17) "**Energy burden**" means the share of annual household income used to pay annual home energy bills.
 - Section (25) "**Low-income**" means household incomes as defined by the department or commission, provided that the definition may not exceed the higher of eighty percent of area median household income or two hundred percent of the federal poverty level, adjusted for household size.
- **Commerce Guidelines for CETA, RCW 19.405.120:**
 - Commerce set the threshold for determining **energy assistance need** at 6% energy burden.
 - An **affordable energy burden** should be at or below six percent of household income.
- **WAC 480-100-605 Clean Energy Transformation Standards Definitions:**
 - "**Energy assistance need**" as "the amount of assistance necessary to achieve an energy burden equal to six percent for utility customers."

What is Energy Burden and Why do we Care?



$$\text{Energy Burden} = \frac{\text{Annual Household Energy Bill}}{\text{Annual Household Income}}$$

Energy bill includes electric, gas, and other heating fuel sources.

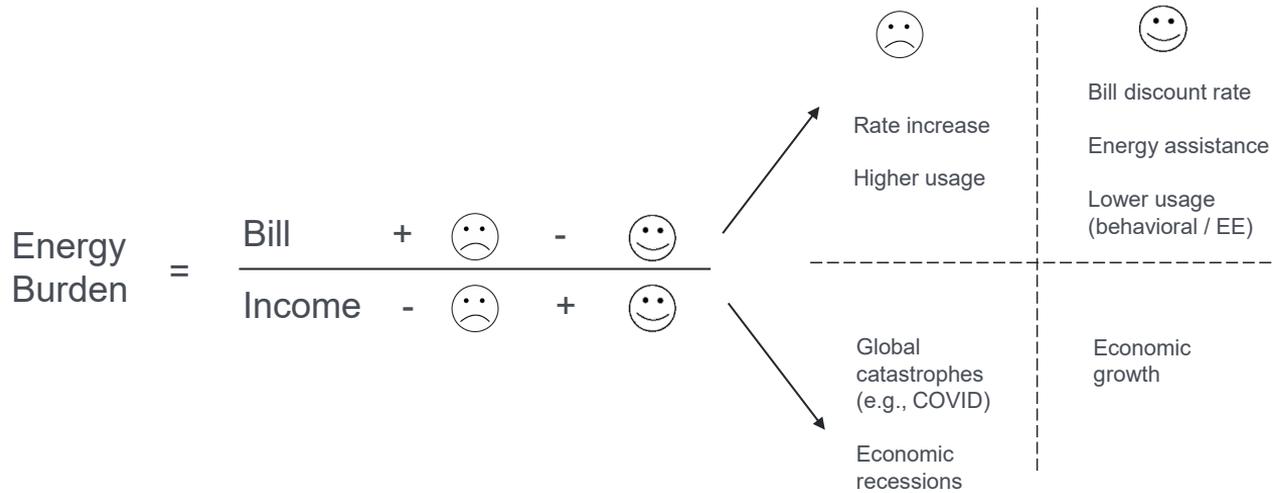


Customers with EB > **6% are energy-burdened**

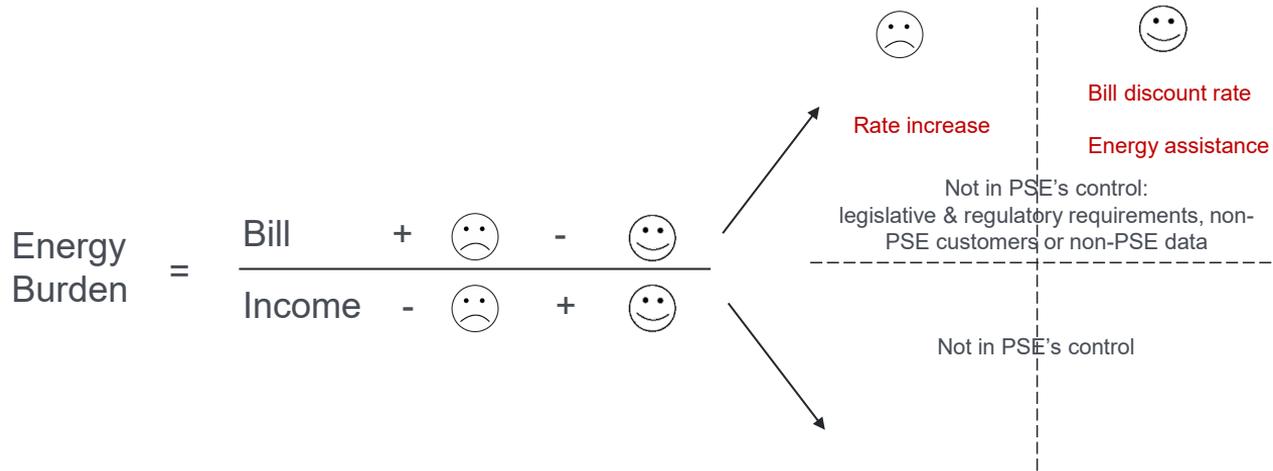


CETA (RCW 19.405.120): demonstrate progress through cumulative assessment of previous funding levels for energy assistance compared to the funding levels needed to meet 60% of the current EAN, or increasing energy assistance by 15% over the amount provided in 2018, whichever is greater by 2030; and 90% of the current EAN by 2050.

Elements of Energy Burden Change



Elements of Energy Burden Change: Simplified

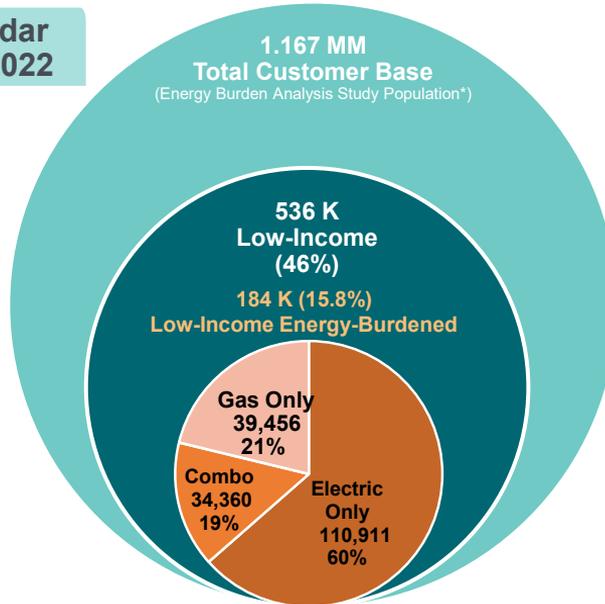


2022 EBA Results

Total Customer Base

PSE's 2022 Energy Burden Analysis: key results and takeaways

Calendar
Year 2022



The Who & Why

- Most customers have low energy burden, and **16.2% are estimated to be energy-burdened** (including non low-income)
- **Majority of energy-burdened** customers are classified as **low-income**
- While just over **a third of low-income customers are energy-burdened**, energy burden tends to concentrate at lower end of income spectrum
- **Most energy-burdened customers are electric customers**
- **Energy-burdened customers use more energy on average** than overall residential customers
- **High energy burden** is more likely among **vulnerable customers**

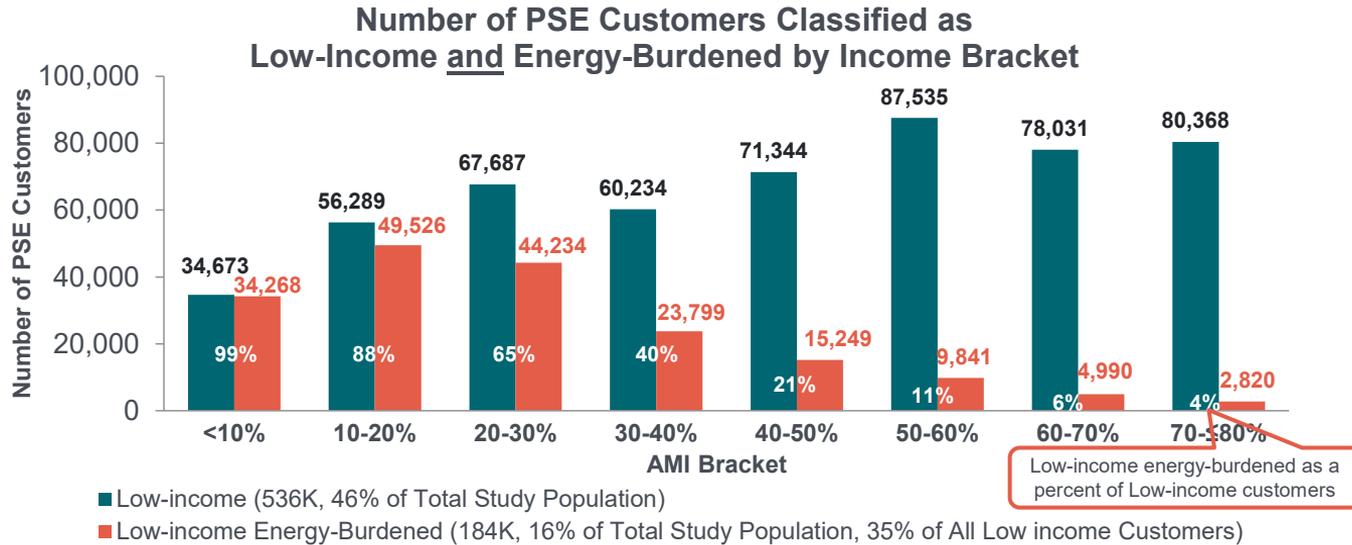
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MARCH 4, 2024

PSE's 2022 Energy Burden Analysis: Summary of Results

- Households classified as low-income per WA CETA's new definition:
 - About 536K (46%) of PSE's residential customers in the EBA study population* were estimated to earn 80% Area Median Income ("AMI") or below – i.e., classified as low-income.
 - By utility service type: 51% of Electric Only, 25% of Gas Only, and 24% of Combined Electric and Gas ("Combo") customers.
- Energy-burdened households:
 - About 185K of PSE's residential customers in the EBA* are estimated to be energy-burdened and low-income.
 - That's about 16% of total EBA study population, or 35% of customers classified as low-income.
- Low-income and energy-burdened customers by utility service type:
 - Out of all customers estimated to be energy-burdened and low-income, 60% are PSE's Electric Only customers; 21% are PSE's Gas Only customers; and 19% are PSE's Combined Electric and Gas customers.

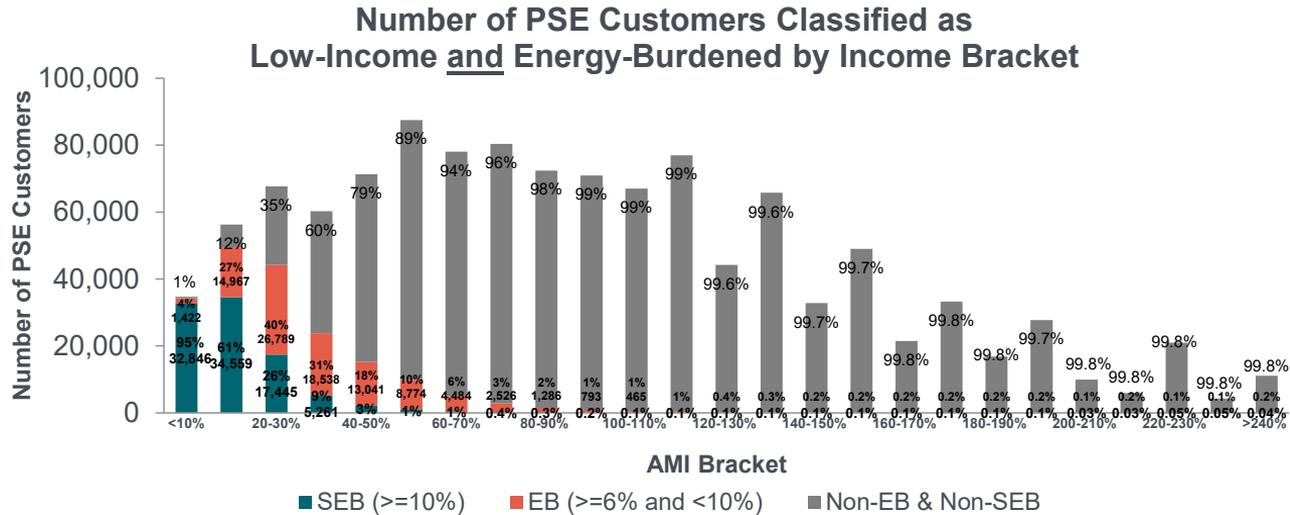
*Note: Energy Burden Analysis amounts to roughly 80% of PSE's total residential population based on 2022 10-K.

Energy burden concentrates at lower end of the income spectrum



*Note: Energy burden analysis includes roughly 80% of total residential customer base (based on 2022 10-K) because of several data challenges

As income increases, the proportion of energy-burdened customers decreases

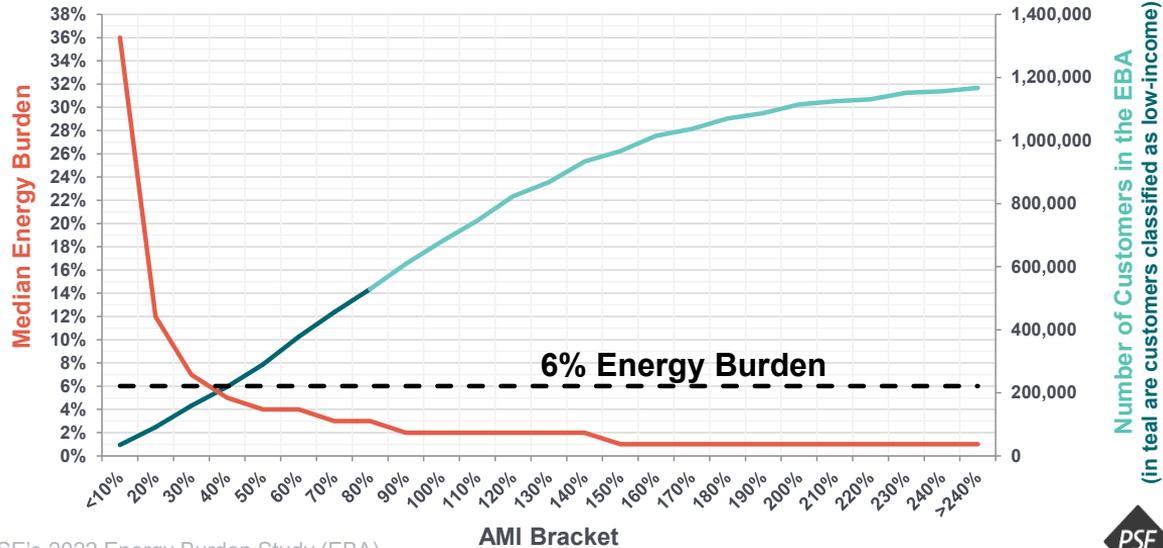


*Note: Energy burden analysis includes roughly 80% of total residential customer base (based on 2022 10-K) because of several data challenges

**SEB: Severely Energy Burdened; EB: Energy-Burdened

Median energy burden decreases significantly with increasing AMI, and for customers in the 0-40% AMI range, *median* energy burden is above 6%

**Cumulative Number of PSE Customers
versus Median Energy Burden by Income Bracket**

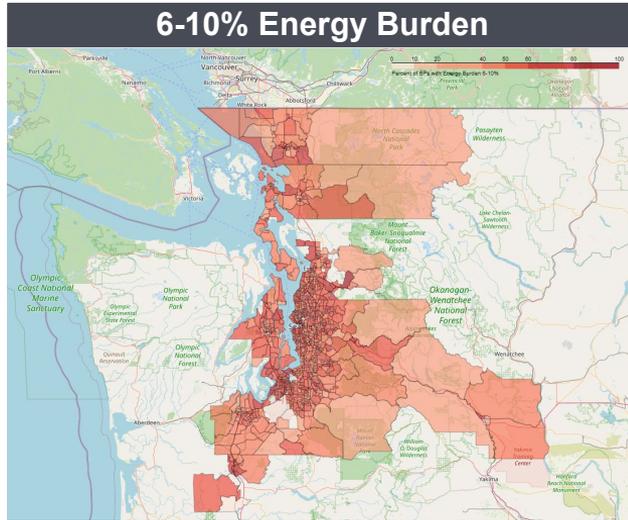


Median energy burden of estimated low-income and energy-burdened customers is 10%

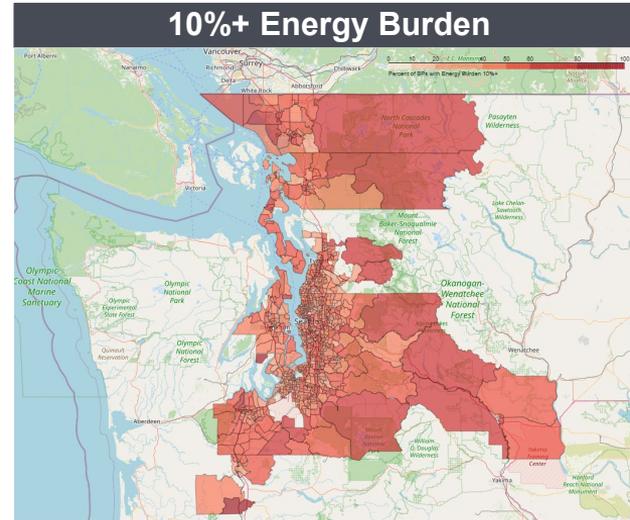
Customer segment	Median energy burden
All customers in 2022 EBA	2.4%
Estimated Upper-income (income >115% AMI)	1.5%
Estimated Moderate-income (income >80% and ≤115% AMI)	2.1%
Estimated Low-income (income ≤80% AMI)	4.4%
Estimated Low-income & Non-HEB (EB≤6%)	3.3%
Estimated Low-income & Energy-burdened (EB>6%)	10.1%

A geographical view of Energy Burden across PSE service territory highlights areas with more energy-burdened customers on average

- Interactive maps illustrate census tracts with higher portions of PSE customers in the ranges of:



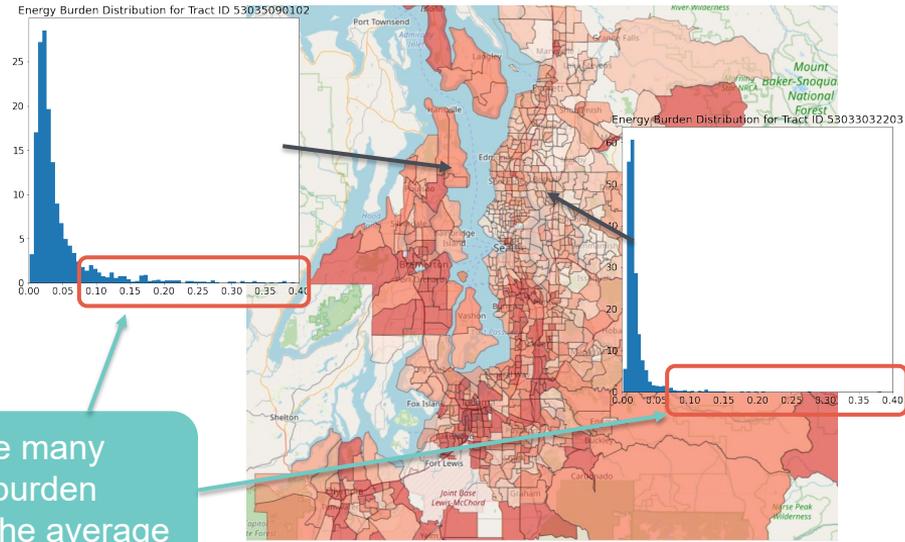
Data shown here: EB from > 6% to equals to 10% EB



Data shown here: EB > 10%

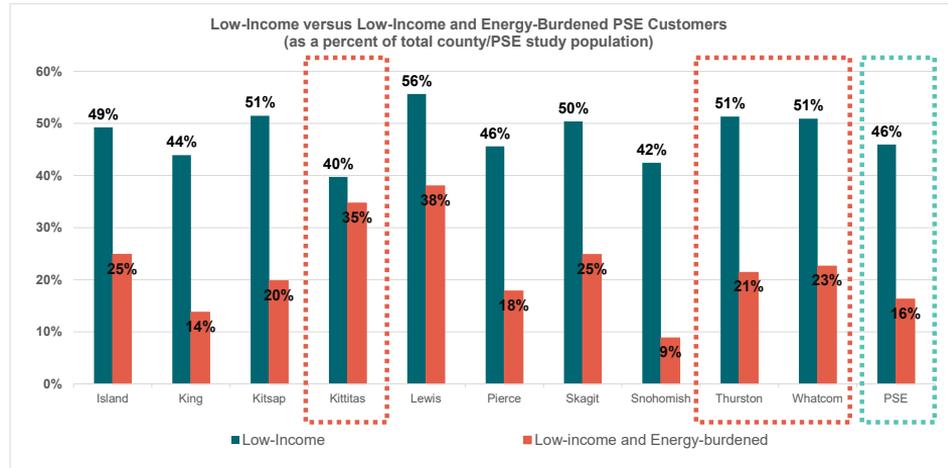
There are energy-burdened customers **within** each area

- Within each census tract, energy burden tends to reflect right-skewed shape
 - As a result, talking about “average” energy burden within any geography is misleading
- Each geography will have many households with energy burden significantly higher than the average



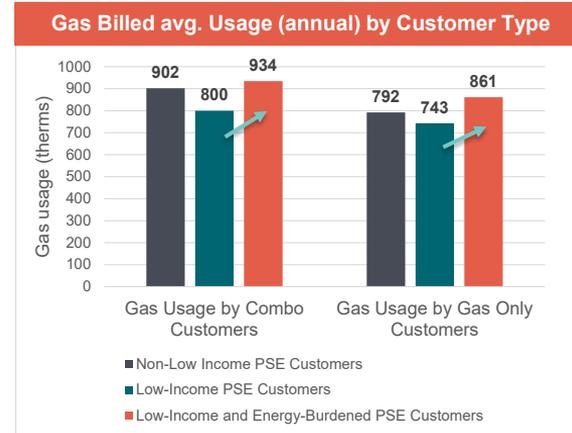
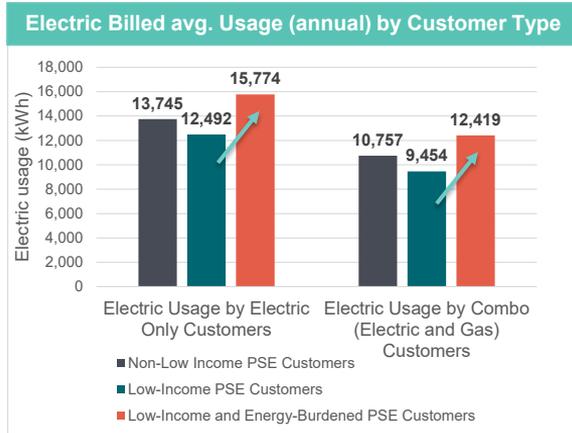
Source for map and histograms: PSE 2020 EBA

Comparisons by county also show the importance of identifying customers classified as low-income and their energy burdens



- Thurston, Whatcom, and Kitsap Counties have second highest percent of customers (51%) classified as low-income, and 20-23% were estimated to be energy-burdened.
- Kittitas County has a lower percentage of customers classified as low-income (40%) but majority of those customers are estimated as low-income and energy-burdened (35%).

Energy-burdened customers use more energy than overall EBA study population



- On average, Electric Only customers' usage is higher than Combo customers' electric usage.
- Classified low-income energy-burdened customers' electric usage is higher than for overall low-income customers in the EBA by about 30% on average
- Classified low-income energy-burdened customers' gas usage is higher than for overall low-income customers in the Energy Burden Analysis by about 16% on average

Annual energy assistance need (EAN) – PSE portion

- PSE-bill portion of EAN is about 74% of total estimated EAN
- About 80% of PSE’s EAN is for severely energy-burdened customers (EB>10%)

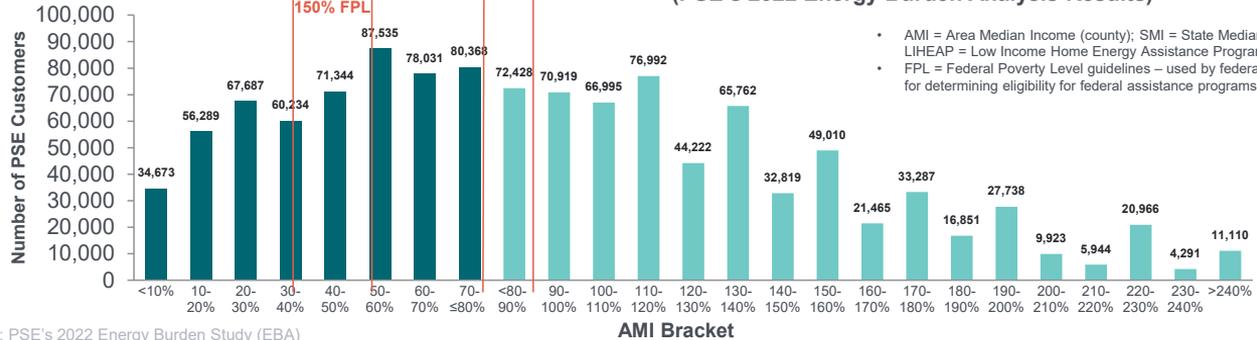
PSE-bill portion of EAN (\$ million)	Estimated EAN for Low-Income HEB Customers*	Estimated EAN for Low-Income SEB Customers
Low-Income	\$155.5 million	\$124.0 million
Electric Only	\$98.4 million	\$80.3 million
Gas Only	\$18.6 million	\$14.2 million
Combo	\$38.5 million	\$29.5 million

*Note: HEB data is inclusive of SEB data.

PSE's Current Low Income Programs: Eligibility

1. Energy Efficiency (EE) program
2. Budget Payment Plan
3. Payment Arrangements
4. Efficiency Boost Program (90% AMI)
The greater of 200% FPL or 80% AMI (CETA definition):
5. PSE HELP (eff. Oct 1, 2021)
6. Warm Home Fund (eff. Oct 1, 2022)
7. Bill Discount Rate (eff. Oct 1, 2023)
8. Community Solar Income-Qualified (eff. Oct 1, 2023)
9. Temp. Arrearage Management Program (AMP) (eff. Oct 1, 2023)
10. PSE Low-Income Weatherization (LIW) (60%SMI/200%FPL or 80% AMI)
11. Federal LIHEAP (150% FPL)

Number of PSE Customers by Income Bracket (PSE's 2022 Energy Burden Analysis Results)



- AMI = Area Median Income (county); SMI = State Median Income; LIHEAP = Low Income Home Energy Assistance Program
- FPL = Federal Poverty Level guidelines – used by federal agencies for determining eligibility for federal assistance programs.

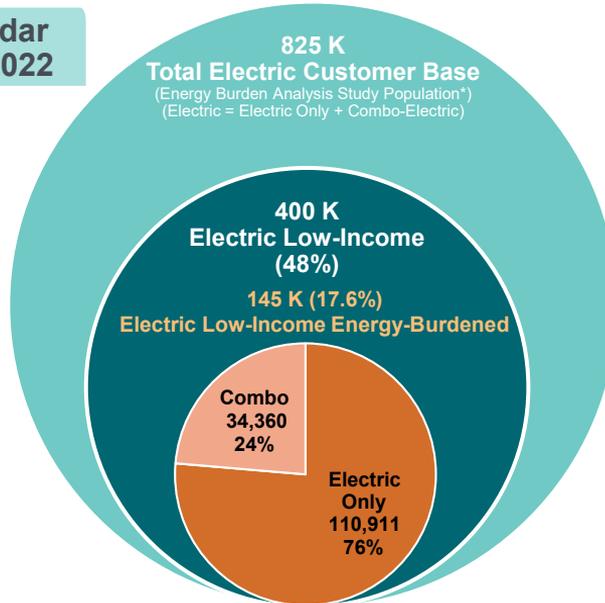
Source: PSE's 2022 Energy Burden Study (EBA)

2022 EBA Summary

Electric utility (electric only and
combined-electric customers)

Electric: PSE's 2022 EBA key results and takeaways

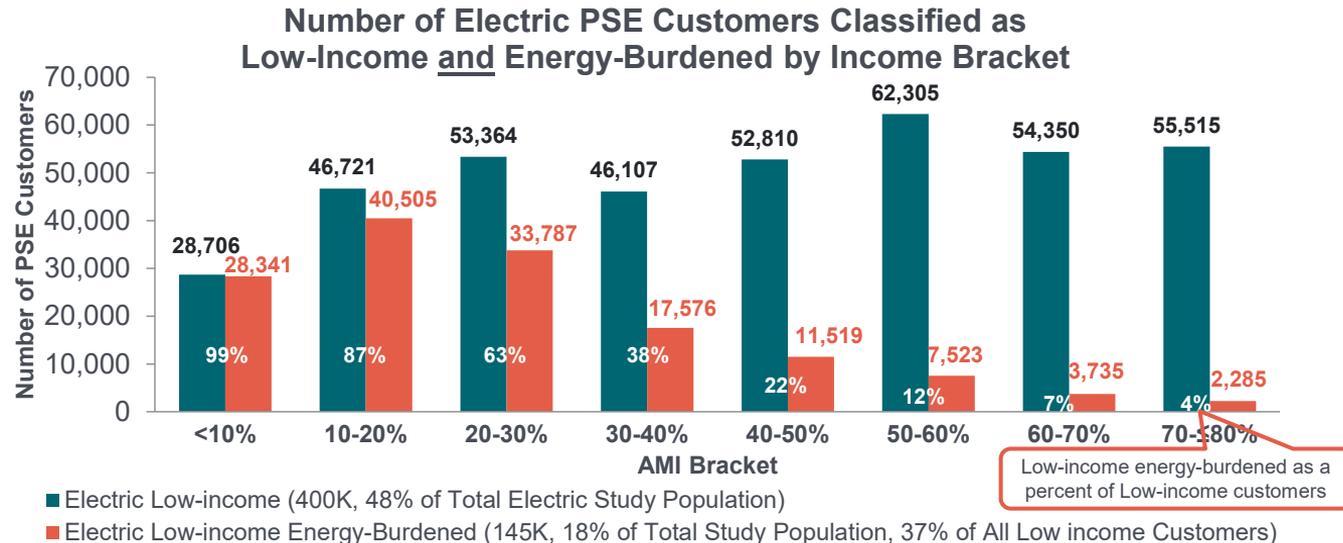
Calendar
Year 2022



The Who & Why

- Most customers have low energy burden, and **18.1% are estimated to be energy-burdened** (including non low-income)
- **Majority of electric energy-burdened** customers are classified as **low-income**
- While **over a third of low-income customers are energy-burdened**, energy burden tends to concentrate at lower end of income spectrum
- Most electric energy-burdened customers are PSE's **electric only customers**
- Energy-burdened customers **use more energy on average** than overall residential customers
- **High energy burden** is more likely among *vulnerable customers*

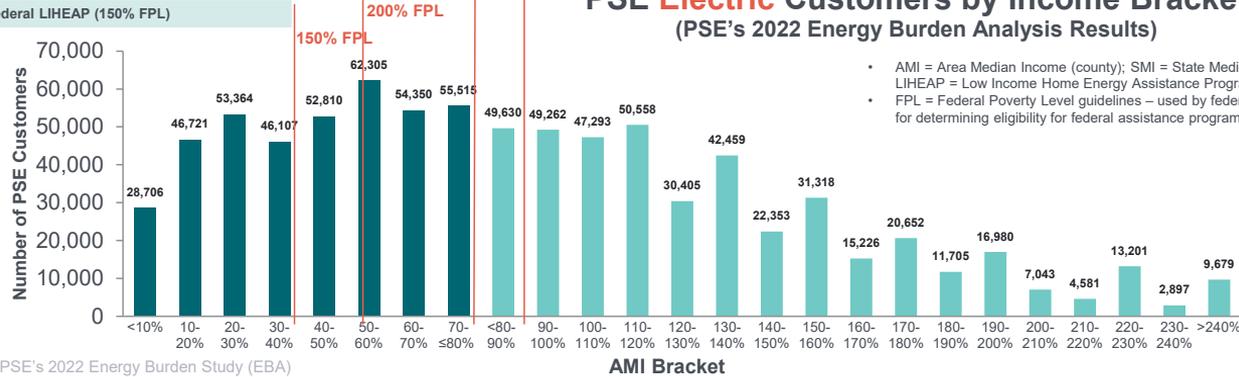
Electric: As income increases, the proportion of electric energy-burdened customers decreases



*Note: Energy burden analysis includes roughly 77% of total electric residential customer base (based on 2022 10-K) because of several data challenges

Electric: PSE’s Current Low Income Programs: Eligibility

1. Energy Efficiency (EE) program
2. Budget Payment Plan
3. Payment Arrangements
4. Efficiency Boost Program (90% AMI)
The greater of 200% FPL or 80% AMI (CETA definition):
5. PSE HELP (eff. Oct 1, 2021)
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9. Temp. Arrearage Management Program (AMP) (eff. Oct 1, 2023)
10. PSE Low-Income Weatherization (LIW) (60%SMI/200%FPL or 80% AMI)
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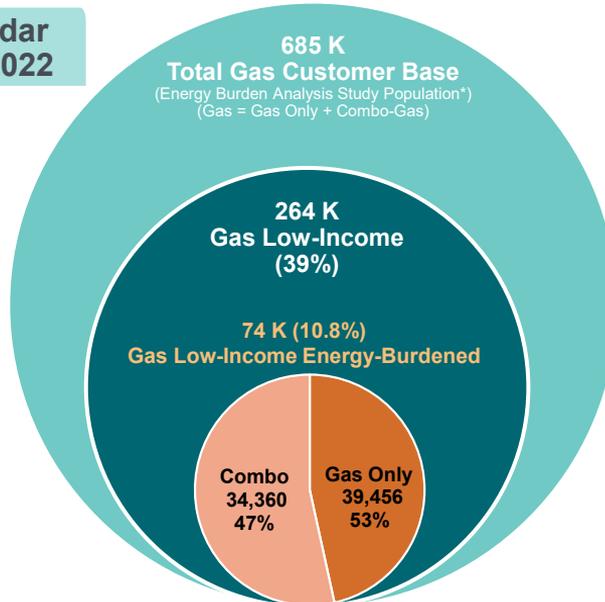
Source: PSE's 2022 Energy Burden Study (EBA)

2022 EBA Summary

Natural Gas utility (gas only and
combined – gas customers)

Gas: PSE's 2022 EBA key results and takeaways

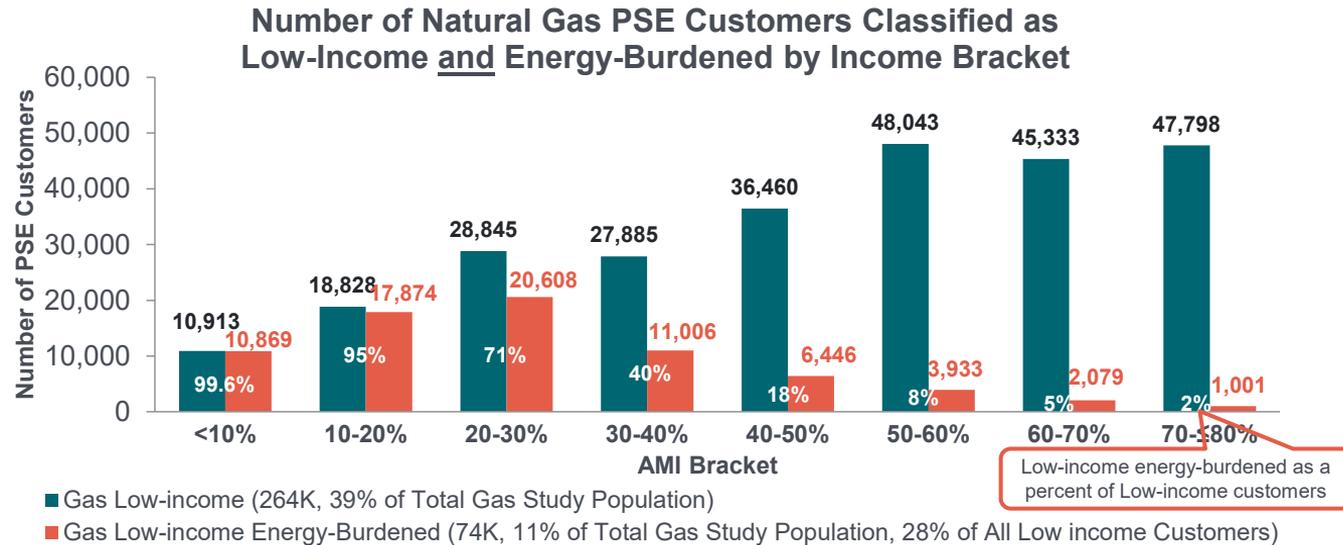
Calendar
Year 2022



The Who & Why

- Most customers have low energy burden, and **11% are estimated to be energy-burdened** (including non low-income)
- **Majority of energy-burdened** customers are classified as **low-income**
- While **just under a third of low-income customers are energy-burdened**, energy burden tends to concentrate at lower end of income spectrum
- **Most energy-burdened customers are also electric customers (dual-fuel)**
- **Energy-burdened customers use more energy on average** than overall residential customers
- **High energy burden** is more likely among **vulnerable customers**

Gas: As income increases, the proportion of natural gas energy-burdened customers decreases

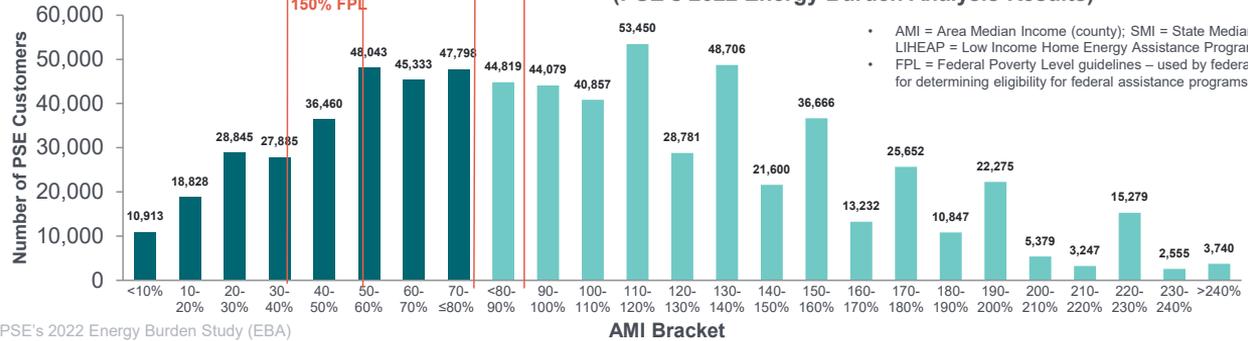


*Note: Energy burden analysis includes roughly 84% of total gas residential customer base (based on 2022 10-K) because of several data challenges

Gas: PSE's Current Low Income Programs: Eligibility

1. Energy Efficiency (EE) program
2. Budget Payment Plan
3. Payment Arrangements
4. Efficiency Boost Program (90% AMI)
The greater of 200% FPL or 80% AMI (CETA definition):
5. PSE HELP (eff. Oct 1, 2021)
6. Warm Home Fund (eff. Oct 1, 2022)
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10. PSE Low-Income Weatherization (LIW) (60%SMI/200%FPL or 80% AMI)
11. Federal LIHEAP (150% FPL)

PSE Gas Customers by Income Bracket (PSE's 2022 Energy Burden Analysis Results)



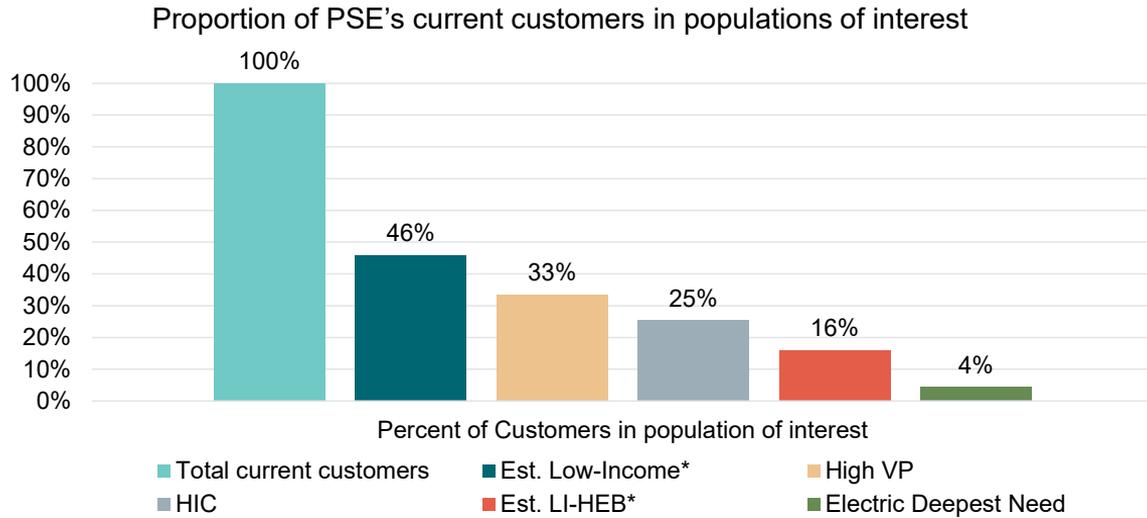
- AMI = Area Median Income (county); SMI = State Median Income; LIHEAP = Low Income Home Energy Assistance Program
- FPL = Federal Poverty Level guidelines – used by federal agencies for determining eligibility for federal assistance programs.

Analysis of Populations of Interest

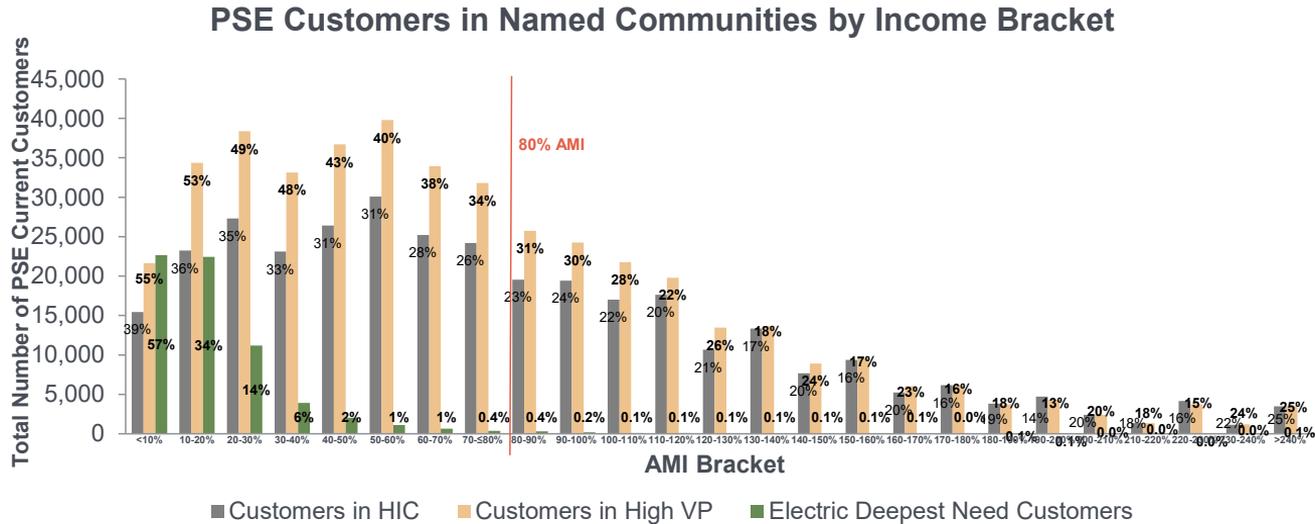
Populations of Interest:

Low-income (LI)	2022 EBA: HHs with annual income \leq 80% AMI, HH adjusted
<ul style="list-style-type: none"> • CETA: Area Median Income (AMI) \leq80% or \leq200% Federal Poverty Level (FPL), whichever is highest, adjusted for HH size 	
Low-income and Energy-Burden (LI-HEB)	2022 EBA: LI-HEB: EB > 6% and LI-SEB: EB > 10%
<ul style="list-style-type: none"> • Energy Burden (EB): Annual home energy expenses as a % of annual HH income [CETA] • High energy burden (HEB): HHs with energy burden above 6% [CETA / Commerce] • Severe energy burden (SEB): HHs with energy burden above 10% [APPRISE / DOE] 	
Named Communities	Highly Impacted Community (HIC)
	CETA: A community designated by the Department of Health based on the cumulative impact analysis required by RCW 19.504.140 or a community located in census tracts that are fully or partially on "Indian country."
	High Vulnerability Population (High VP)
	High VP: Census block groups with High level VPs. PSE identified Vulnerable Populations in conjunction with its Clean Energy Implementation Plan a methodology described in PSE's CEIP and using feedback from PSE's Equity Advisory Group.
Named Communities	CETA: HIC - Communities that experience a disproportionate cumulative risk from environmental burdens due to: adverse socioeconomic factors, including unemployment, high housing and transportation costs relative to income, access to food and health care, linguistic isolation, and sensitivity factors, such as low birth weight and higher rates of hospitalization.
	Electric Deepest Need (DN or eDN)
PSE with EAG, LIAC, and CRAG per Order 08 of 2021 CEIP: Electric customers with severe energy burdens ("SEB", energy burden at or above 10%), plus additions from: PSE used a spatial analysis technique to identify clusters of individual electric customers with SEB and included customers in the top 50th percentile of block groups with high counts of severely-energy-burdened customers.	

Percentage of PSE customers estimated in various populations of interest



Customers in Named Communities by AMI bracket

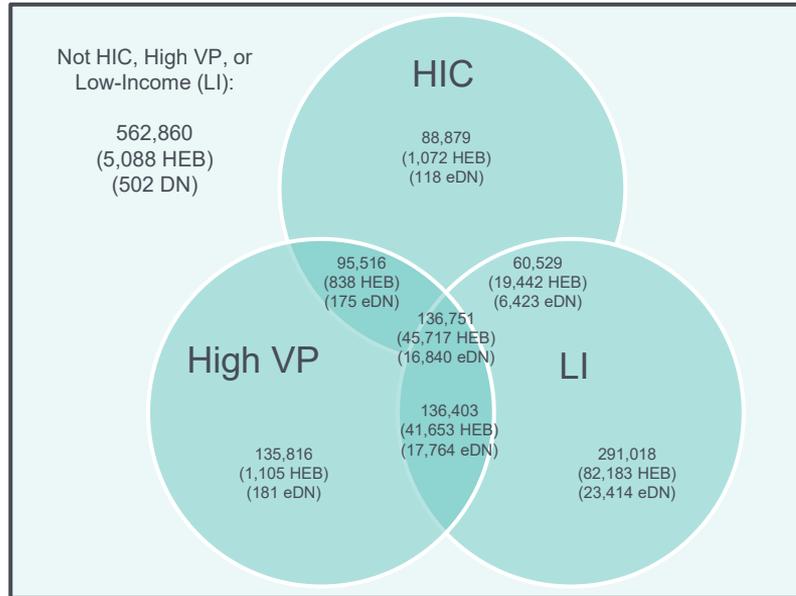


37 | *Named Communities: Electric Deepest Need (eDN), Highly Impacted Communities (HIC), and High Vulnerability Populations (High VP)



Identifying the overlap between Named Communities and low-income customers

1,507,772 Customers Total



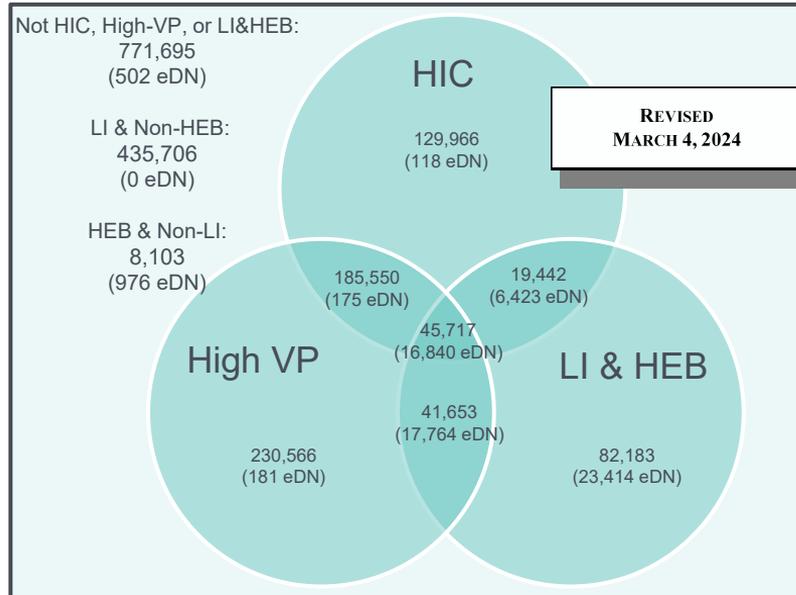
- While there is some overlap, these three groups identify somewhat distinct customer sets
- 63% of active Residential customers are either HIC, High VP, or LI
- About 137K customers are in all three groups (HIC, High-VP, and LI)
- The vast majority of electric deepest need (eDN) customers, 99.2%, are also Low-Income

*Note: LI & HEB designations are at customer level, while HIC and VP designations are at Census Block group levels (communities/areas)



Identifying the overlap between Named Communities and low-Income & energy-burdened customers

1,507,772 Customers Total

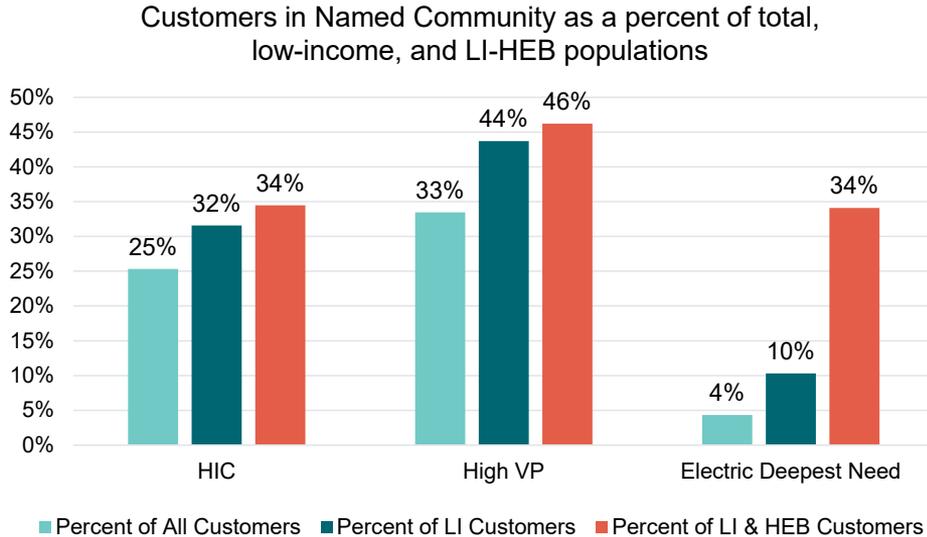


- While there is some overlap, these three groups identify somewhat distinct customer sets
- 49% of active Residential customers are either HIC, High-VP, or LI & HEB
- About 46K customers are in all three groups (HIC, High VP, and LI-HEB)
- The vast majority of electric deepest need (eDN) customers, 98.5%, are Low-Income and Energy-Burdened
 - Total eDN = 65,417 customers
 - eDN+LI&HEB = 64,441 (98.5%)
- Nearly 70% of LI-HEB customers are either HIC, High VP, or electric deepest need.
 - Total LI-HEB = 188,995
 - Total LI-HEB that are also either HIC, High VP, or eDN = 130,226 (69%)

*Note: LI & HEB designations are at customer level, while HIC and VP designations are at Census Block group levels (communities/areas)

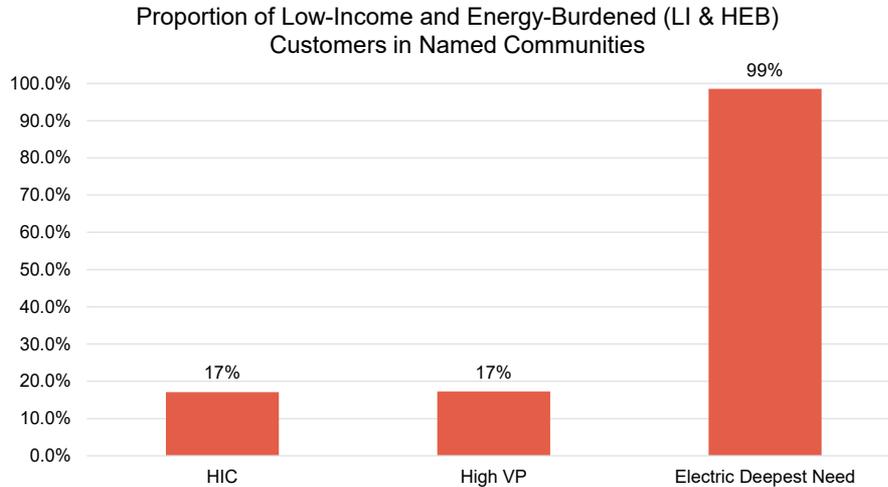


Low-income & energy-burdened customers are more likely to be in Named Communities



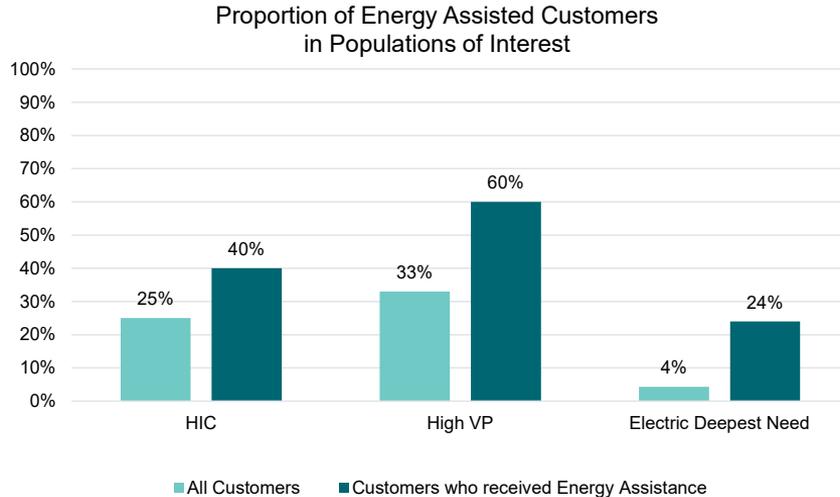
- LI & HEB customers are more likely to be in HIC or in High VP, and significantly more likely to be electric deepest need, than PSE's all current customers overall

Customers in populations of interest are more likely to be low-income and energy-burdened



- For HIC and High VP subgroups, 17.1% and 17.3% are LI-HEB, respectively
- For electric deepest need customers, 98.5% are LI-HEB

Overview of energy assistance recipients by populations of interest demonstrates strong representation of Named Communities



- From 2020-2023, 100,325 unique residential customers received energy assistance.
- Of these customers:
 - 40% are in Highly Impacted Communities (versus 25% overall customer base)
 - 60% are in High Vulnerability Population (versus 33% overall customer base)
 - 24% are electric Deepest Need (versus 4% overall customer base)
 - 52% are Energy-Burdened (versus 16% found in 2022 EBA)

Appendix

Additional methodology slides

Defining Energy Burden

- A household's energy burden is the **percentage of income spent on home energy bills**.
- Commerce set the threshold for determining **energy assistance need at 6% energy burden**.
- Customers with energy burden of **above 6%** are defined as energy-burdened.
 - Commerce set the threshold for determining **energy assistance need at six percent energy burden**. This definition comes from a widely accepted principle that total shelter costs should not exceed 30 percent of income and that utility costs should not exceed 20 percent of those shelter costs, leading to the conclusion that an **affordable energy burden should be at or below six percent** of household income (20% x 30% = 6%).

Energy Burden Equation:

$$\frac{\text{Annual (Electricity Bill + Gas Bill + Other Heating Fuels Bill)}}{\text{Annual Income}}$$

PSE Energy Burden formula permutations:

- PSE's Combined Electric and Gas customers:

$$\text{Yearly} \frac{\text{PSE Electricity Bill} + \text{PSE Gas Bill} + \text{Other Heating Fuels Bill}}{\text{Income}}$$

- PSE's Electric Only customers:

$$\text{Yearly} \frac{\text{PSE Electricity Bill} + \text{Other Gas Bill} + \text{Other Heating Fuels Bill}}{\text{Income}}$$

- PSE's Gas Only customers:

$$\text{Yearly} \frac{\text{Other Electricity Bill} + \text{PSE Gas Bill} + \text{Other Heating Fuels Bill}}{\text{Income}}$$

Working Definitions in the Energy Burden Studies:

Energy Burden (EB)

HEB: EB > 6% and SEB: EB > 10%

- Energy Burden (EB): Annual home energy expenses as a % of annual HH income [CETA]
- **High energy burden (HEB)**: HHs with energy burden above 6% [CETA / Commerce]
- **Severe energy burden (SEB)**: HHs with energy burden above 10% [APPRISE / DOE]

Household (HH)

Residential PSE customer, identified by business partner ID

- Business partners (BP) with single and up to 10 customer accounts (CA)
- Customers with available income and other data

Low-income (LI)

HHs with annual income $\leq 80\%$ AMI, HH adjusted

- CETA: Area Median Income (AMI) $\leq 80\%$ or $\leq 200\%$ Federal Poverty Level (FPL), whichever is highest, adjusted for HH size

Energy Assistance Need (EAN)

The dollar amount in assistance necessary to reduce energy burden to equals 6% for one year. [CETA / Commerce]

Data sources

- **Income data**
 - 2022 Third Party data vendor and Ground Truth Estimates from PSE Survey Data
 - 2018 DOE/NREL LEAD Tool Data
- **Billed amounts**
 - 2022 PSE billing data
 - 2018 DOE/NREL LEAD Tool data
- **Geographic Information**
 - 2010 U.S. Census Jurisdictions: Census block groups aggregated to tracts
 - 2023 PSE Premise locations aggregated to block groups
- **Named Community Information**
 - 2022 Washington State Department of Health Environmental Health Disparities Map data;
 - 2023 PSE Vulnerable Populations analysis per PSE 2021 CEIP Order 08;
 - 2023 PSE Deepest Need analysis per PSE 2021 CEIP Order 08.

The new definition of low-income: the higher of 80% Area Median Income or 200% Federal Poverty Level

2022-2023 PSE HELP Monthly Income Guidelines

Household Size	King County	Snohomish County	Kitsap County	Pierce County	Thurston County	Island County	Whatcom County	Kittitas County	Skagit County	Lewis County
1 Person	5,563	5,563	4,804	4,738	4,708	4,163	4,233	3,967	4,021	3,683
2 Persons	6,354	6,354	5,488	5,417	5,383	4,758	4,838	4,533	4,596	4,208
3	7,150	7,150	6,175	6,092	6,054	5,354	5,442	5,100	5,171	4,733
4	7,942	7,942	6,858	6,767	6,725	5,946	6,046	5,667	5,742	5,258
5	8,579	8,579	7,408	7,308	7,267	6,425	6,533	6,121	6,204	5,679
6	9,213	9,213	7,958	7,850	7,804	6,900	7,017	6,575	6,663	6,198
7	9,850	9,850	8,508	8,392	8,342	7,375	7,500	7,029	7,121	6,985
8	10,483	10,483	9,054	8,933	8,879	7,850	7,983	7,772	7,772	7,772
9	11,121	11,121	9,604	9,475	9,417	8,558	8,558	8,558	8,558	8,558
10	11,754	11,754	10,154	10,017	9,954	9,345	9,345	9,345	9,345	9,345
11	12,392	12,392	10,700	10,558	10,492	10,132	10,132	10,132	10,132	10,132
12	13,025	13,025	11,250	11,100	11,029	10,918	10,918	10,918	10,918	10,918
13	13,663	13,663	11,800	11,705	11,705	11,705	11,705	11,705	11,705	11,705
14	14,296	14,296	12,492	12,492	12,492	12,492	12,492	12,492	12,492	12,492
15	14,933	14,933	13,278	13,278	13,278	13,278	13,278	13,278	13,278	13,278
16	15,567	15,567	14,065	14,065	14,065	14,065	14,065	14,065	14,065	14,065
17	16,204	16,204	14,852	14,852	14,852	14,852	14,852	14,852	14,852	14,852
18	16,838	16,838	15,638	15,638	15,638	15,638	15,638	15,638	15,638	15,638
19	17,475	17,475	16,425	16,425	16,425	16,425	16,425	16,425	16,425	16,425
20	18,108	18,108	17,212	17,212	17,212	17,212	17,212	17,212	17,212	17,212
21	18,746	18,746	17,998	17,998	17,998	17,998	17,998	17,998	17,998	17,998
22	19,379	19,379	18,785	18,785	18,785	18,785	18,785	18,785	18,785	18,785
23	20,017	20,017	19,572	19,572	19,572	19,572	19,572	19,572	19,572	19,572
24	20,650	20,650	20,358	20,358	20,358	20,358	20,358	20,358	20,358	20,358
25	21,288	21,288	21,145	21,145	21,145	21,145	21,145	21,145	21,145	21,145

For households with less than 5 members, 80% AMI is greater than 200% FPL, across all counties in PSE's service territory.

80% AMI is the higher threshold

200% FPL is the higher threshold