



# WASHINGTON STATE COMMUNITY ACTION PARTNERSHIP

Washington's Poverty Fighting Network. Helping People, Changing Lives.

October 18, 2024

Received  
Records Management  
Oct 21, 2024

## Via UTC Web Portal

### Electronic Filing and Service

Jeff Killip  
Executive Director and Secretary  
Washington Utilities and Transportation Commission  
621 Woodland Square Loop SE  
Lacey, WA 98503

### **RE: Comments from The Energy Project in support of Avista's LIRAP filing, UE-240651/UG-240652**

Dear Executive Director and Secretary Killip:

The Energy Project supports Avista Utilities' Tariff WN U-28, Schedule 92, Low-Income Rate Assistance Program filing from August 30<sup>th</sup>, 2024. The filing increases program funding for LIRAP & outlines a new administrative structure for future program years. TEP believes these changes enable Avista and its Community Action Partners to continue expansion of benefits that reduce energy burdens to limited-income and vulnerable populations served by Avista's LIRAP programs. Specifically, the filing's Program Implementation Funding Proposal provides a future-conscious and innovative structure for program delivery. The proposal is the result of a commendable level of collaboration with Avista and their Energy Assistance Advisory Group, Community Action Agency partners, and Empower Dataworks.

The Program Implementation Funding Proposal is based on mutually held principles between the company and community advocates, listed below:

- i. At a minimum, it should reflect the cost to implement a year-round program
- ii. It should capture the value of agency expertise and the added cost to serve their customer segment
- iii. It should incentivize program growth, and promote equitable service among hard-to-reach communities
- iv. It should strengthen accountability for ratepayer dollars, with metric tied to customer benefits, not just spending
- v. It should be relatively predictable for the utility and the agencies



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Avista's proposed model acknowledges that one point of entry and one size does not fit all among communities eligible for LIRAP services and values meeting the community where they are. The model also leverages Community Action Agency expertise in program delivery and values the need for cross-enrollments and wrap-around services in addition to energy assistance for vulnerable households.

The Energy Project thanks Avista for working collaboratively with its Community Action Agencies to propose this change, which will help overcome barriers to serve hard-to-reach populations. The Avista territory has an extremely strong group of Community Action Agencies committed to energy affordability services with deep presences in their communities. The partnership within the LIRAP program is extremely valuable for agencies, the company, and the community.

Respectfully submitted,  
*/s/ Shaylee Stokes*

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