Puget Sound Energy

Attachment A to Low Income Program Outcome Compliance Filing

Annual Report on Program Outcome of PSE's Low Income Program

Of

Electric and Natural Gas Schedules 129

Home Energy Lifeline Program ("HELP")

For 2021 Program Year October 2021 through September 2022

Filed May 24, 2023



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Introduction and Background

Puget Sound Energy's ("PSE's") low income bill assistance program, the Home Energy Lifeline Program ("HELP") under the electric and natural gas Schedules 129, Low Income Program, provides energy bill-payment assistance to eligible PSE customers whose household is considered as a low-income household.

PSE's HELP bill-payment assistance is separate but supplemental to the federally-funded Low-Income Home Energy Assistance Program ("LIHEAP") that is available year-round to help eligible households paying for their home heating and cooling bills. For the 2021 program year, October 2021 through September 2022, eligible households may receive up to \$1,000 per year per customer in HELP credit to offset their PSE electricity or natural gas bills, which is the same maximum as the 2009 through 2021 program years. The maximum of \$1,000 HELP credit is consistent with the maximum LIHEAP benefit level as adopted by the Washington State Department of Commerce in its distribution of the LIHEAP benefit.¹

PSE's HELP was first implemented in accordance with Exhibit G to Settlement Stipulation Agreement ("Exhibit G") approved by the Washington Utilities and Transportation Commission ("Commission") in consolidated Dockets UE-011570 and UG-011571 Twelfth Supplemental Order dated June 20, 2002. As outlined in Paragraph 20 of the Exhibit G:

"Program outcomes will be monitored and analyzed through an annual report the Company will submit to the Commission no later than May 31st of each year in a form to be developed by the Low Income Agencies, NW Energy Coalition, Commission Staff, Public Counsel, and PSE. Such reports will be used to modify the LIP [Low Income Program] where indicated. At a minimum, the annual report shall include: number of participants, total amount of assistance paid, and average level of assistance per household."

HELP was further amended by the Partial Settlement Agreement approved by the Commission on January 5, 2007, in Dockets UE-060266 and UG-060267. The HELP settlement terms allow eligible low-income customers to receive bill-payment assistance with no limitation on how the HELP bill-payment assistances are applied to any amounts owed (past, present, and future) by these customers to PSE.

On October 8, 2008, the Commission approved three additional HELP changes in its Order 12 of the consolidated Dockets UE-072300 and UG-072301 ("2007 Order 12"). Appendix D to the 2007 Order 12 detailed of the three changes that became effective for program years starting 2008.

- 1. HELP funding is distributed to electric and natural gas customers at the fixed percentages of 75% and 25%, respectively.
- 2. The total annual HELP funding is increased from \$10.25 million to \$15 million.
- 3. Any HELP funds not distributed to customers in any single program year will be carried over to the next program year as supplemental HELP funding.

With the merger of PSE and Puget Holdings LLC, these three changes above were further affirmed as Commitments 22, 23, and 42 of the Multi-Party Settlement Stipulation approved by the

¹ Washington State 2022 LIHEAP State Plan (PDF): https://www.commerce.wa.gov/wp-content/uploads/2021/06/2022-Draft-LIHEAP-State-Plan.pdf

Commission on December 30, 2008, in Order 8 of Docket U-072375, Approving and Adopting Settlement Stipulation; Authorizing Transaction Subject to Conditions.

Additional funding has been available to low-income customers to mitigate the effect of PSE electric and natural gas rate changes (Supplemental HELP Funding Adjustment). This Supplemental HELP Funding Adjustment was described in PSE's Initial Brief in the PSE's 2009 General Rate Case ("2009 GRC") under the consolidated Dockets UE-090704 and UG-090705, as follows:

The company proposed to increase the annual level of low-income electric and natural gas bill assistance funding by the corresponding percent increase to the residential class that are approved by this Commission. The amount of this percentage increase would be added to the low income tariff in the next program year.

This Supplemental HELP Funding Adjustment has been incorporated into PSE's annual electric and natural gas Schedules 129 HELP funding requirement true-up for the HELP periods since the 2010 HELP year.

On May 7, 2012, per Order 8 of the consolidated Dockets UE-111048 and UG-111049, the base funding for the low-income bill assistance program was increased to \$20.2 million, based on 0.665 percent of PSE's 2010 operating revenues. Prior funding level reflected about 0.51 percent of PSE's 2010 operating revenues. The base HELP funding is distributed to electric and natural gas customers at the fixed ratio of 75% and 25%, respectively, as set forth in 2007 Order 12.

On June 25, 2013, as a condition for the Commission's approval of PSE's Expedited Rate Filing ("ERF") and Decoupling mechanisms², the Commission ordered an increase of HELP funding of \$1.0 million per year during the three-year rate plan for the two mechanisms. The additional \$1.0 million per year became the base HELP funding to \$21.2 million for the program years starting from October, 1 2013. In addition, per paragraph 177 on page 76 in Order 7 of ERF and Decoupling dockets (jointly Dockets UE-121697 and UG-121705 (Consolidated) and Dockets UE-130137 and UG-130138 (Consolidated)), HELP funding is increased in proportion to the residential bill impacts of decoupling.

In the low income filings for the 2016 program year, UE-161039 and UG-161047, the total annual funding cap became \$23.503 million, which was reflected in the total HELP funding for the 2017 program of October 1, 2017, through September 30, 2018.

For the 2018 program year of October 1, 2018, through September 30, 2019, additional HELP funding was made available and the associated allocation between electric and natural gas services became 80% and 20%, respectively. These funding changes were approved by the Commission in Order 08 of the consolidated Dockets UE-170033 and UG-1700340 ("Order 08"). Order 08 also adopted new HELP eligibility criteria that are based upon federal poverty level and approved a two-year eligibility certification process for certain income-qualified customers. Both eligibility changes became effective on October 1, 2018.

² Order 7 of consolidated Dockets UE-121697 and UG-121705 (Decoupling) and consolidated Dockets UE-130137 and UG-130138 (Expedited Rate Filing)

Per the Commission's approval of the HELP tariff schedule revisions in Dockets UE-210792 and UG-210793 on November 12, 2021, the following HELP changes become effective starting from the 2021 HELP year of October 2021 through September 2022:

- 1. Reallocation of HELP funding annual cap: The fixed funding allocation between electric and natural gas services became 90% and 10%, respectively.
- 2. Low-income Eligibility: Eligible HELP households were revised to be consistent with the "low-income households" as defined by RCW 19.405.020(25). That is, a household with an income not to exceed the highest of 80% of area median income in an area or 200% of federal poverty level adjusted for household size.

As described above, PSE's electric and natural gas tariff Schedules 129 set forth the amount of HELP funding to be made available to eligible low-income customers via the Schedules 129 charges collected from all PSE customers. Another source of the HELP funding are the potential penalties associated with PSE not meeting its service quality index ("SQI") benchmarks set forth in its Service Quality program. When the total annual penalty amounts are less than the equivalent of \$12 per customer, the applicable SQI penalty are allocated to the appropriate PSE HELP fund based upon the energy service affected by each missed SQI. For the 2021 HELP year, there was no additional funding resulting from SQI penalties.

Description of HELP Bill-Payment Assistance

HELP Bill-Payment Assistance by Fuel Type and Program Year

The following table shows the number of PSE residential low-income customers who received billpayment assistance from PSE's HELP during the 2021 program year, the 12-month period of October 1, 2021, through September 30, 2022.

Electric customers:	23,655
Natural gas customers:	6,585

The number of eligible low-income households that received HELP bill-payment assistance is lower than the sum of the two numbers above since some households are both PSE natural gas and electric customers. The total number of low-income households that received bill-payment assistance is 26,280 (i.e., there are 3,760 HELP households that received both PSE electric and natural services during the period of October 1, 2021, through September 30, 2022). Of the electric customers who received bill-payment assistance, 16% were also natural gas customers. Of the natural gas customers who received bill-payment assistance, 57% were also electric customers. The chart below is a comparison of the number of customers who received bill-payment assistance since the 2017 HELP year by fuel type and by program year.





The number of eligible low-income customers that received HELP bill-payment assistance as percentage of the total number of residential customers by electric and natural gas is 2.2% (23,655 out of 1,062,410) and 0.8% (6,585 out of 808,211), respectively. Overall 1.6% of PSE residential customers received either or both electric and natural gas HELP bill-payment assistance.

The chart below shows the distribution of the number of years a customer received HELP billpayment assistance for either their PSE electric or natural gas service or both during the 2017-2021 program years. 46% of the HELP customers received only one HELP bill-payment assistance during those years; while 14% of HELP customers received at least one HELP assistance every year during that 5-year period.



The total dollar amount of HELP bill-payment assistance distributed to customers during the 2021 program year was:

Electric	\$11,987,950
Natural Gas	\$2,264,344
Total	\$14,252,294

The total HELP funding provides for the bill-payment assistance to customers, PSE program costs, and the fees to agencies that administer HELP as outlined in PSE's electric and natural gas tariff Schedules 129. The actual percentages of HELP bill-payment assistance distributed to the customers of each fuel type are 84% electric and 16% natural gas for the 2021 HELP year.

The base 2021 HELP year funding was allocated initially as 90% for electric and 10% for natural gas, as approved by the Commission in Dockets UE-210674 and UG-210675. The final allocation of 89% and 11% reflects the true-up estimate in prior year filing, under collection through September 2021 (excluding revenue sensitive items), and the 90%/10% allocation of Public Utility Tax Credits PSE received from Washington State Department of Revenue under RCW 82.16.0497.

The table and charts below show a comparison, by fuel type, of the percentages of HELP billpayment assistance distributed with the percentages of total residential customers and total residential revenues. Electric residential customers were allocated significantly more HELP payment assistance than natural gas residential customers based upon the proportion of total residential revenue and total residential customer count percentages.



The following charts show the relative amount of bill-payment assistance distributed to eligible low-income electric and natural gas residential customers by program year.



Monthly Pattern of Distribution of HELP Bill-Payment Assistance

The following two charts show the monthly pattern of distribution of HELP bill-payment assistance to eligible low-income PSE customers during the 2021 program year by fuel type. The first chart is a side-by-side bar chart with both the electric and natural gas payment assistance.



The second chart is a stacked bar chart with both the electric and natural gas payment assistance by month.



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The chart below shows the combined electric and natural gas distributed HELP bill-payment assistance on a monthly basis for the 2021 program year (depicted by the heavy line) and the previous two program years (in light lines). As the qualifying low-income agencies exhaust the LIHEAP funding throughout the program year, the distribution of PSE HELP funding increased to make up the difference in the available low-income bill-payment assistance. The timing that the qualifying low-income agencies notified PSE of the eligible HELP customers also affected the monthly distribution pattern. For the 2021 HELP year of October 2021 through September 2022, 24% of the annual amount of HELP bill-payment assistance was distributed to the eligible very-low income customers in the first four months of, October through January, before and during the peak of winter heating season whereas that percentages for the 2020 and 2019 HELP years were 39% and 51%, respectively.



The chart below shows a comparison of the cumulative amount of distributed HELP bill-payment assistance on a monthly basis for the 2021 program year (shown in heavy line) and the previous two program years (in light lines). Among the 2019-2021 program years, the 2021 HELP year has the highest amount of distributed HELP bill-payment assistance -- an increase of 8% from the 2020 HELP year or 30% increase from the 2019 HELP year.



Among the HELP bill-payment distribution results for the past ten program years, the 2019 program year had the lowest amount of \$10,948,422 during the 2011-2021 HELP years. The 2016 HELP year had the highest amount of HELP bill-payment distribution of \$16,795,824. The 2021 program year ranks the 6th in the annual results of the HELP bill-payment distribution.





Demographics of Customer Households

HELP Bill-Payment Assistance by County Area

The average level of HELP bill-payment assistance to each eligible low-income household is \$538 for the 2021 program year ending September 31, 2022. The overall average HELP bill-payment assistance per PSE energy account that received HELP bill assistance is \$484 due to the fact that 3,760 households have both PSE electric and natural gas services. The average HELP bill-payment assistance per PSE electric account that received electric HELP bill assistance is \$507. The average HELP bill-payment assistance per PSE natural gas account that received natural gas HELP bill assistance is \$344.

The chart below shows the average HELP bill-payment assistance per household for the various county areas in PSE's service territory. Kittitas County and the combined Counties of Thurston and Lewis have the highest average of HELP bill-payment assistance per household whereas Snohomish County, where PSE provides mostly natural gas service, has the lowest average HELP assistance amount.



HELP Bill-Payment Assistance and Annual Bill by County Area

For the purpose of comparison among all the county areas, the average residential and the HELP customer annual bill information presented in the following charts and the customer count information used in the calculation is based upon 12 months ending September 30, 2022, to coincide with the 2021 HELP year.

The chart below shows a comparison by county area of the average annual bill per HELP account and per PSE residential account, thus comparing the average bill of a HELP customer to the average bill a general residential customer. For the 2021 program year, the customers who received HELP bill-payment assistance had, on average, annual bills that were higher than that of average PSE residential customers, which is consistent with results from the prior HELP years. Most of the county areas show similar relationship except Kitsap and Snohomish Counties.



The chart below compares the ratio of average HELP bill-payment assistance per HELP account to the average annual bill per HELP account for the 2021 program year by county area. It demonstrates, on average, how much of an electric and/or natural gas PSE HELP customer's PSE annual energy bills was mitigated by PSE's HELP bill-payment assistance. The overall average ratio is 36%, i.e. the HELP bill-payment assistance alone could pay for 36% of a HELP customer's annual energy bills. Among the current PSE service areas, Snohomish County has the highest ratio of 43% and Kittitas County has the lowest ratio of 30%.





The following charts show the number of eligible low-income customers receiving HELP billpayment assistance as percentage of the number of residential customers in a county area. The overall percentages for electric and natural gas are 2.2% and 0.8%, respectively.



Percentage of Electric Residential Customers Received HELP Bill-Payment Assistance

Percentage of Natural Gas Residential Customers Received HELP Bill-Payment Assistance



The chart below shows the percentage distribution of PSE residential customers, including both electric and natural gas, by county area along with the percentage of PSE HELP customers in that area during the same period of October 2021 through September 2022. Snohomish, Pierce, and Kitsap Counties have proportionally significantly less number of HELP customers than the rest of the county areas.

- 7.7% of PSE residential customers are in Snohomish County but only 2.9% of the PSE HELP customers are in the county.
- Whatcom and Island Counties combined have 6.8% of PSE residential customers but 12.5% of the PSE HELP customers are in the county.



The chart below shows the percentage by county area of PSE total residential electric and natural gas billed amount in a county area compared to the percentage of PSE HELP bill-payment assistance distributed to that area.

- King, Pierce, Kitsap, and Snohomish Counties received less HELP bill-payment assistance than the rest of the county areas in terms of the percentage of the residential billed amount.
- Thurston/Lewis, Whatcom/Island, and Skagit Counties received higher percentages of PSE HELP bill-payment assistance than that of PSE residential billed amount from these areas.



HELP Customers Average Monthly Energy Usage

The following charts show the patterns of the average monthly energy usage of PSE HELP customers in comparison with that of all PSE residential customers for the 2021 program year of October 1, 2021, through September 30, 2022, by electric and natural gas. These two charts are based upon the customers who received either electric and/or natural gas PSE HELP assistance/s during the 2021 HELP year. Both natural gas and electric usage of a PSE HELP customer are included in the analysis, e.g., the average natural gas monthly usage chart reflects the natural gas usage of both natural gas and electric PSE HELP bill-assistance customers.

For the 2021 program year, PSE HELP customers had higher average electric monthly usage than that of PSE residential customers except during the summer months.



For the natural gas usage, the HELP customers' usage during the winter months was less than that of residential customers but about the same as that of PSE residential customers during the summer months.



HELP Bill-Payment Assistance by Residential Housing Structure

The two charts below show comparisons by fuel type and residential housing structure type between PSE residential customers and the eligible low-income customers who received HELP bill-payment assistance during the 2021 program year. Electric HELP customers were more likely to live in a multi-family structure whereas natural gas HELP customers were mostly living in a single-family structure.









HELP Bill-Payment Assistance Impacts

During the 2021 HELP year, PSE resumed its non-payment disconnection after the Commission issued Order 01 in Docket U-200281 to end the suspension of the disconnection of energy services for nonpayment. This Washington State Covid-19 pandemic restriction was effective between February 2019 and September 2021.

The charts below show the relationship between the low income customers who became eligible HELP customers during the 2021 program period of October 2021 through September 2022 and the non-payment/credit disconnections associated with these customers that occurred during the same period.

Percent of Customers Who Became HELP Customers and Were Disconnected due to Electric/Gas Non-payment/Credit During October 2021-September 2022 Percent of Non-payment/Credit Disconnected Customers Who Became Electric/Gas HELP Customers During October 2021-September 2022



Administration of Program

During the 2021 program year, there were eleven³ qualifying low-income agencies administering PSE's HELP and distributing bill-payment assistance to PSE customers. In addition to the distribution of the HELP bill-payment assistance to eligible low-income customers, these agencies also received allotment of funds from PSE as administrative fees to run the HELP and related support services such as customer education, eligibility evaluation, bill-assistance amount determination, and other services.

The charts below illustrate the amounts of the HELP administration costs and bill-payment assistance to customers by program year. For the 2021 program year, the overall agency administration fees comprised 22% of the total actual spending of the HELP and PSE's own administrative program costs were 3%.



³ Opportunity Council, Kitsap Community Resources, CA of Skagit Co., Pierce Co. Human Services, Multi-Service Center, MDC, Hope Source, Byrd Barr Place, Snohomish Human Services, CAC for Thurston/Lewis, and Hopelink.

Marketing of PSE Home Energy Lifeline Program

During the 2021 program year of October 2021 through September 2022, Puget Sound Energy made customers aware of the HELP and through bill inserts, bill mailing envelopes, bill-print messages, and in-person conversations.

The samples below illustrate some of the communications used to raise awareness about PSE's Home Energy Lifeline Program.

1. January 2022: Monthly Customer Newsletter

We're here to help With the end of Washington's utility moratorium, disconnections have resumed. If you are behind on payments, we want to help you keep the lights on. Explore extended payment plans or see if you qualify for up to \$4,500 through our assistance programs. Visit **pse.com/help.**

2. January 2022 Bill envelope, also posted on pse.com



3. February 2022: Monthly Customer Newsletter

Difficulty paying your bill?

Set up a payment arrangement to make smaller weekly, bi-weekly, or monthly payments, which will help you manage your energy costs and keep your account in good standing.

Learn more: Log in to your account at pse.com/login or call customer service at 1-888-225-5773.

We stand behind our service to you. We constantly track our performance and use your feedback to make improvements. We'll credit your bill if we fail to meet our service guarantees.





4. February 2022: Bill envelope, also posted on pse.com

	PSE PU	JGET SOUND ENERGY	1101 02/22
	Q	Help us help you You may qualify for assistance with your heating bill. Visit pse.com/help.	
F	This envelope is recyclable February 2022: Bill message Ebruary 2022 bill print messages ummary page		

We're here to help

5.

If you're having difficulty paying your bill, please call us or go to your myPSE account for payment arrangements. pse.com/mypse

6. March 2022: Monthly Customer Newsletter

We have resources to help

If you are struggling with high bills, we have home weatherization and bill assistance programs to help. It's easy to learn if you are eligible for home upgrades or billing assistance by going online at pse.com/help or by contacting your local community agency to schedule your appointment.

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Catch up with payment arrangements

Just by adding a little more to your bill each month, setting up a payment arrangement allows you to pay down your past due balance over a period up to 18 months. Select a payment schedule that works for you by choosing weekly, bi-weekly or monthly payments. Login into your PSE online account to set up your payment arrangement today.

7. March 2022: Bill print messages

March 2022 bill print messages Summary page

Get Help with your heating bill Depending on income and household size, you may be eligible for free weatherization assistance as well as payment assistance. pse.com/assistance

8. April 2022: Monthly Customer Newsletter

Help your neighbors in need

Consider donating to The Salvation Army Warm Home Fund, which provides short-term, emergency bill payment assistance to PSE customers facing financial difficulties. To give a little extra on your next PSE bill payment, specify the donation amount on your payment stub or when you pay online.

9. May 2022: Monthly Customer Newsletter

Difficulty paying your bill?

If you're having difficulty paying your PSE bill, consider setting up payment arrangements for multiple smaller payments over time. This can help you better manage your energy costs and keep your PSE account in good standing. Visit **pse.com** and sign into your PSE online account or call us at **1-888-225-5773** for more information.

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10. May 2022: Billing Envelope



11. May 2022: Billing Message

We're here to help

If you're having difficulty paying your PSE bill, consider setting up payment arrangements for smaller, multiple payments over time. Sign in to your account or contact us. pse.com/paymentarrangement