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May 10, 2021

Mark L. Johnson  
 Executive Director and Secretary  
 Washington Utilities & Transportation Commission  
 621 Woodland Square Loop SE  
 Lacey, WA 98503

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 State Of WASH.  
 UTIL. AND TRANSP.  
 COMMISSION

Re: Docket No. U-200281 – COVID-19 Response & Disconnection Moratorium

Dear Mr. Johnson,

Avista Corporation, dba Avista Utilities (Avista or the Company), submits the following data in response to Commission Staff’s request per Attachment A to their memo for the March 25, 2021 Open Meeting.

1. Energy Assistance Disbursement in April 2021

**Response:**

	New COVID-19 Bill Assistance Programs			LIHEAP	Low-Income Rate Assistance Program (LIRAP)
	Automatic Grants	Forgiveness Grants	Total		
Total Benefits	\$2,884,773	\$160,914	\$3,045,686	\$1,142,304	\$1,481,958
Number of accounts	4,872	144	5,016	1,772	3,560
Average Benefits	\$592	\$1,117	\$607	\$645	\$416

LIHEAP and LIRAP information provided above is for the time period of April 1, 2021 through April 30, 2021. It should be noted that due to the variable distribution options available within LIHEAP and LIRAP, it is possible for one customer to receive multiple energy assistance grants. For example, a total of 2,493 LIHEAP payments were distributed to the 1,772 LIHEAP recipients listed above; likewise, the 3,560 LIRAP customers noted received a total of 4,861 payments or

discounts. Additionally, the LIRAP counts above are inclusive of customers enrolled in the Company’s LIRAP Senior and Disabled Rate Discount Program (tariff Schedules 02 and 102). In total, 831 Rate Discount customers received 1 monthly discount each for a total of \$29,270, with the average customer benefit received being \$35.

Additionally, of the \$160,914 distributed to the 144 customers referenced above for the Forgiveness Grant in April 2021, below is a breakdown of the total applications for Avista’s Debt Relief Program, listed by the source of the application—either the Community Action Agencies (CAA) or the associated Community Partner Network (CPN).

April 2021	CAA	CPN
Total Benefits	\$157,300	\$3,613
Number of Accounts	140	4

2. Past Due Balances as of April 30, 2021, (the same data as listed in Section J-8 of the Second Revised Staff Term Sheet approved in Order 02 in Docket U-200281) in a consistent format and at the same level of details with the report for the first quarter of 2021, and a calculation of the difference from data as of March 31, 2021.
  - a. The number of customers by customer class with past-due balances (arrearages);
  - b. The amount of past-due balances, by customer class, that are 30, 60, 90, and more than 90 days past due, and the total amount of arrearages;
  - c. The amount of past-due balances for known low-income households that are 30, 60, 90, and more than 90 days past due, and the total amount of these arrearages;
  - d. The amount of past-due balances classified as uncollectible;
  - e. If different than item d, the amount of past-due balances written off and classified as bad debt; and
  - f. The number of customer accounts referred to collection agencies, the total amount of debt referred for collection, and total revenue to the company from the collection process.

**Response:** Please see Attachment A to these comments. The Company would like to highlight that from the end of March 2021 to April 2021 the number of residential customers in arrears declined by 13% and the total arrears declined by 17%. These results can be attributed to the impacts of the Company’s COVID-19 Debt Relief Program, along with energy assistance provided to customers as noted in the table above.

3. Long-term Payment Agreement, Arrearage Management Plans (AMPs), and debt relief in April 2021 (the same data as listed in Section J-4 of the Second Revised Staff Term Sheet approved in Order 02 in U-200281) in a consistent format and at the same level of details with the report for the first quarter of 2021, and a calculation of the difference from data as of March 31, 2021.

- a. The number of customers, by customer class, taking service at the beginning of the month during the period under existing long-term payment agreements;
- b. The number of customers by customer class, completing long-term payment agreements in the month;
- c. The number of customers, by customer class, enrolling in new long-term payment agreements in the month; and
- d. The number of customers, by customer class, renegotiating long-term payment agreements in the month.

**Response:** Please see Attachment A to these comments.

4. Outreach activities in April 2021, both a narrative and the specific number of contacts the company made by phone, mail, email, etc.

**Response:** Avista launched its “Power of Compassion” outreach efforts during the first week of April, concurrent with the commencement of its Debt Relief Program. Inclusive of print advertising in local publications, bill inserts, brochures and flyers, social media ads, digital display advertising, reminder letters, emails, doorhangers, updates to the Avista website, and a “Compassion in Action” personal callout campaign, the Company has used multiple platforms to try to reach its customers during this difficult time. The Company continued its monthly feature regarding bill assistance in each of its Connections newsletters, as is has every month since April of 2020. Additionally, in the month of April 2021 alone, Avista advertised in 24 local publications throughout its Washington service territory, with further iterations of these advertisements (expanding to 27 total publications and including ads in Spanish) planned again in May and June. The estimate of customer impressions from the publication placements is approximately 253,350 impressions. From April 8-20<sup>th</sup>, Avista also posted ads on social media for an approximate additional reach of 12,000 viewers, and through its 12-week digital display advertising from April-June the Company estimates a reach of up to 2.25 million views.

Along with the general outreach noted above, the Company also continued sending direct mail reminder letters to customers with past due balances in April, providing them with information about the potential assistance available to them and encouraging them to contact Avista or their local CAA. 17,444 direct letters were sent to approximately 16,460 customers in April. In concert with these targeted efforts, Debt Relief Program grant recipients were also sent letters and emails as confirmation of their grant receipt. While all 4,872 Automatic Grant and 144 Forgiveness Grant recipients were sent a letter via direct mail, those with email addresses available also received an email confirmation of their grant. For the Automatic Grant, this resulted in 3,761 emails being sent to customers on April 9, 2021, and for the Forgiveness Grant, 114 emails have been sent.<sup>1</sup>

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<sup>1</sup> Forgiveness Grant letters/emails are sent on a weekly basis, with 114 emails being sent in April and 102 of these messages confirmed as deliverable.

During the month of April, Avista saw a 279% increase in the number of visits made to its assistance webpage, which can be primarily attributed to the Company’s pronounced outreach efforts. To further encourage customers to seek bill assistance, the Company also made updates to the navigation and content of its website, providing ease in access to local Community Action Agency information, and delivering state-specific pages dedicated to assistance programs available, featuring the additional COVID-19 related offerings.

The table below shows the April 2021 results of the Company’s “Compassion in Action” callout campaign, which targeted customers with past due balances 90+ days old. While this campaign focused on directly reaching these customers through personal phone calls made by a specialized team of Customer Service Representatives (CSRs), the phone calls were also accompanied by emails to customers if such contact information was available, as well as further in-person outreach to customers within this group that the Company was otherwise unable to reach or those that have had limited contact with Avista. Such visits by Avista’s Field Personnel are created as a new Outreach Order Type, with the intention to be connecting with the customers as well as verifying occupancy. At the door, customers are greeted and reassured that these are *connection* visits, not a collection visit. Callouts to reach those with 90+ arrears continued throughout the first week of May, with the final callouts completed on May 6, 2021.

<b>Compassion in Action (as of April 30, 2021)</b>	
Accounts Reviewed	<b>6,537</b>
No Call Needed (already paid, stopped service, working with EA, etc.)	<b>911</b>
Callouts Made	<b>5,626</b>
No Answer	<b>4,435</b>
Answered/Spoke with Customer	<b>1,191</b>
Left Voicemail	<b>2,971</b>
Sent Concurrent Email	<b>4,135</b>
Unable to Reach	<b>263</b>
Spanish Speaking	<b>43</b>
Field Activities Completed	<b>74</b>
Door Hangers Left	<b>44</b>
Referred to Customer Service/EA	<b>28</b>
Unable to Leave Door Hanger	<b>2</b>

Please direct any questions regarding these comments to me at 509-495-2782 or [shawn.bonfield@avistacorp.com](mailto:shawn.bonfield@avistacorp.com).

Sincerely,

*/s/ Shawn Bonfield*

Shawn Bonfield  
Sr. Manager of Regulatory Policy & Strategy