

**BEFORE THE WASHINGTON  
UTILITIES AND TRANSPORTATION COMMISSION**

WASHINGTON UTILITIES AND  
TRANSPORTATION COMMISSION,

Complainant,

v.

PUGET SOUND ENERGY,

Respondent.

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DOCKET UE-240004 and UG-240005  
(*Consolidated*)

EXHIBIT SNS-4

LIAC Presentation (July 9, 2024)

August 6, 2024

# Low Income Advisory Committee

July 9, 2024



# Customer Facing Name for AMP

## AMP is now Past Due Bill Forgiveness

- ◆ Could not come to a decision on the customer facing name after discussions internally and with LIAC small working group
- ◆ Surveyed customers enrolled in BDR and arrearage of \$300+ that is 30+ days past due
  - ◆ Sent to 6,000 customers
  - ◆ Received 547 (9%) responses
  - ◆ Expected response rate was 5%
  - ◆ 201 free form responses
- ◆ Decision made based on feedback from customers' voice

# Bill Discount Rate Year 2 Discussion Topics

## Eligibility Verification Outcomes – February Selection

	#	% of Selected	% of Completed
Correct tier	182	45.4%	51.0%
No docs	137	34.2%	38.4%
Over income	2	0.5%	0.6%
Tier change	36	9.0%	10.1%
In process	42	10.5%	-
Removed from EV	2	0.5%	-

## Eligibility Verification Outcomes – February Selection, Tier Change

	#	%
Discount increased	14	39%
Discount decreased	22	61%
Total tier changes	36	-

# Eligibility Verification

- ◆ Are we satisfied with 5% verification?
- ◆ Are we satisfied with random selection or do we want to explore other options like a propensity model?
- ◆ Is useful information being gathered at time of verification (i.e. assess the outcome in more than binary terms to determine if customer was ineligible due to misunderstanding or qualified for additional benefit)?



# Eligibility Verification

- ◆ Are we asking for accessible forms of income documentation?
- ◆ Examples of income documents:
  - ◆ A month of paystubs
  - ◆ An unemployment award letter
  - ◆ A social security or TANF letter
- ◆ Examples of household size documents:
  - ◆ A lease agreement that states the household members
  - ◆ Social security card for each household member
  - ◆ Health insurance card
  - ◆ A piece of business mail sent to them showing the service address and name
  - ◆ A birth certificate
  - ◆ School records that show residence
  - ◆ A foster care award letter
- ◆ Identification (optional): A government issued photo ID with date of birth that is currently active or expired within the last 12 months

# Customer Confusion



What parts of the program process, application, and outreach are confusing to customers?

- ◆ Updates to pse.com page layout
- ◆ Expansion of HELP and BDR FAQs
- ◆ Updates to online and paper applications
- ◆ In process: Updates to mailed letter notifying of EV selection
- ◆ Upcoming: additional updates to online application 10/1

# September LIAC Meeting

- ◆ Should medically fragile customers be treated differently? Including exclusion from EV?
- ◆ Should fixed income customers have a longer term?
- ◆ We selected a 13-month program term. Should we consider a 24-month term?
- ◆ How do we integrate an AMP with HELP and BDR if we choose to keep HELP?

## After 9/30

- ◆ Are Agencies being compensated sufficiently for their experienced workload?
- ◆ Are marketing budgets and efforts correctly set to encourage workload?
- ◆ What communications need to be revised for the utility, agencies or both?
- ◆ Are BDR tiers and discount percentages working with PSE HELP to reduce energy burden to 6%?
- ◆ Do we need to revise KPIs in order to measure the program's effectiveness and efficiency?
- ◆ Do we continue PSE HELP or remove it and instead follow Avista's model of BDR + AMP?

# Requested BDR Reporting

# Age of BDR Applications not in Final Status

Age in Days	Apps	% of All Apps
0-6	695 (32%)	1.0%
7-35	431 (20%)	0.6%
36-105	638 (29%)	0.9%
106-175	342 (16%)	0.5%
176-245	56 (3%)	0.1%
246-315	41 (2%)	0.1%
<b>Total</b>	<b>2203</b>	<b>3.2%</b>

## Notes:

- Data pulled June 26, 2024
- 66,288 (96.8%) of the 68,491 applications are in final status

## After 9/30

- ◆ Adoption rates in highly impacted communities and vulnerable populations
- ◆ Disconnection/dunning:
  - ◆ # that arrive at final notice status for disconnection
  - ◆ # and % in lowest two tiers of TSI scores
    - # and % issued disconnection notice
    - # and % disconnected
- ◆ LIHEAP
  - ◆ # receiving versus not receiving
  - ◆ # receiving before versus after enrollment in BDR
- ◆ BDR applications not in final status and their age from initial creation in EnergyHelp

# Bill Discount Rate and Cap & Invest Low Income Prioritized Credits



## Original Enrollment Group

- ◆ October 2023 to jumpstart the program, we looked at HELP and LIHEAP recipients and added the CCA low income prioritized credits flag to their account with an end date of 24 months from their most recent qualifying event
- ◆ The result was 35,364 accounts had the flag added
- ◆ Of the 35,364 accounts, 30,938 are still active
- ◆ Of the 35,364 accounts,
  - ◆ 22,220 have a customer created application
  - ◆ 368 have an app PSE created from SHA data

## Group to hit 70k target

- ◆ December 2023: added the CCA low income prioritized credits flag to 56,409 accounts
- ◆ January 2024: initial reach out
- ◆ February 2024: enrollment in Tier 6 of BDR
- ◆ May 2024: reminder to apply
- ◆ Of the 56,409 accounts, 52,869 are still active
- ◆ Of the 56,409 accounts:
  - ◆ 3,858 have a customer created app
  - ◆ 800 have an app PSE created from SHA data

## Group to hit 70k target

- ◆ The ask: explore extending the CCA flag and BDR enrollment from end of August to end of November
- ◆ Not Extending Pros/Cons
  - ◆ Timing with rate increases and winter heating
  - ◆ Noticing the discount fall off
  - ◆ Option for additional reach out after the end date
- ◆ Extending Pros/Cons
  - ◆ Timing with ballot measure
  - ◆ Option for additional reach out before end date
  - ◆ Forecast did not include these customers for CCA flag
  - ◆ System capacity with WA Families Clean Energy Credits
- ◆ Decision

# WA Families Clean Energy Credits

## Program Description

- ◆ \$150 million total funding from Dept of Commerce
- ◆ Intention of helping low and moderate income households with the clean energy transition
- ◆ \$200 bill credit per household
- ◆ For residential, electric, active accounts
- ◆ Credits must be used by 9/15/2024
- ◆ At or below 80% AMI then up to 150% AMI
- ◆ Additional prioritization of overburdened communities and vulnerable populations (RCW 70A.02.010) including LIHEAP and rate payer funded assistance program participants in last 12 months

## Selection Method

- ◆ Funds to serve at least 217,961 households
- ◆ Prioritization
  - ◆ Group 1: applied for and received BDR, LIHEAP, or HELP from 9/1/2023. About 54,423 customers
  - ◆ Group 2: Estimated income 0-80% AMI within a highly impacted community and highly vulnerable population not within Group 1. About 91,776 customers
  - ◆ Group 3: Estimated income 0-80% AMI with a current past due amount of \$100 or more. About 68,464 customers
  - ◆ Group 4: Will start with lowest estimated income and work up until we reach the number of households
- ◆ Any unspent admin dollars will help additional households or be returned to Dept of Commerce

# Outreach Plan

- ◆ Email or letter, depending on customer preference
- ◆ Due to multi step process with Commerce, we will be notifying customers at the same time we are applying the credit but will allow customers a period of time to notify us if they would like us to remove the credit

## Final data pull

- ◆ Given the gap from the large data pull to the deadline to distribute funds, we will pull an additional group close to the distribution deadline
- ◆ These customers will receive a notification informing them they have received the credit and will not have an opt out period
- ◆ This will be customers who apply for and receive BDR, HELP, or LIHEAP during this gap who were not already included in Groups 1-4
- ◆ This will be funded through unspent admin dollars we expect to have



# PSE HELP Allocation Method

# PSE HELP Allocation Method

- ◆ Something to discuss starting this fall for 2026 PSE HELP program year
- ◆ Current method is based off of LIHEAP
- ◆ Issues with current method:
  - ◆ LIHEAP and HELP criteria are not lined up
  - ◆ HELP dollar expenditure is not lined up with LIHEAP