

**BEFORE THE
WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION**

WASHINGTON UTILITIES AND
TRANSPORTATION COMMISSION,

Complainant,

v.

CASCADE NATURAL GAS
CORPORATION,

Respondent.

DOCKET UG-240008

CASCADE NATURAL GAS CORPORATION

**THIRD EXHIBIT TO THE
DIRECT TESTIMONY OF DANIEL L. TILLIS**

March 29, 2024

October 31, 2022

Ms. Amanda Maxwell
Executive Director and Secretary
Washington Utilities & Transportation Commission
621 Woodland Square Loop SE
Lacey, WA 98503

Regarding: UG-210755 Compliance Filing to Commission Request for Updates to Advisory Group Pursuant to Order 09

Dear Ms. Maxwell:

In compliance with Paragraph No. 78 of Order 09 in Docket No. UG-210755, Cascade Natural Gas Corporation encloses for filing documents from its October 19, 2022, WEAFF Advisory Group meeting. The following documents are submitted electronically as part of this filing:

- UG-210755-CNGC-Washington-Advisory-Group-Meeting-Notes-10-31-2022
- UG-210755-CNGC-WEAF-Assistance-Outreach-Presentation-10-31-2022
- UG-210755-CNGC-WEAF-Meeting-Minutes-10-31-2022

If you have any questions, please contact me at 208.377.6015 or Chris Mickelson at 509.734.4549.

Sincerely,

Lori Blattner

Lori Blattner
Director, Regulatory Affairs
Cascade Natural Gas Corporation
8113 W. Grandridge Blvd.
Kennewick, WA 99336
Lori.blattner@intgas.com

Attachments

Washington Advisory Group Meeting Notes 10.19.2022

- RealityMine data, 94% of people belonging in the lowest income bracket (household income less than \$25,000) have a smartphone.
 - this percentage is the same within the highest income bracket (\$100,000 or greater)
 - Low earning Millennials are particularly dependent on smartphones
 - low income individuals were found to generally use downloaded apps much more than those within higher income brackets.
 - Media, video, music and audio categories were also heavily dominated by those with a lower income (less than \$50,000)
- In almost every instance, Hispanics over-index when it comes to ownership of tech devices.
- According to a recent Nielson survey, 98% of Hispanics in the U.S. own a smartphone, compared with 93% among the general population. Latinos spend an average of over 30 hours per week on smartphones, more than any other device, including TV. When compared to the total population, Hispanics spent almost two more hours per week watching videos, streaming audio and social networking on their smartphones during COVID-19, as a way to bridge the social distancing gap.
- Research by H Code found that 42% of the Hispanics they surveyed spent at least 6 hours a week listening to music online. And, Hispanic adults are 21% more likely to listen to internet radio than the general online population.

Display Ad Targeting:

- Low-Income Households (<\$60,000)
- Zip Codes – and, natural gas customers and even Cascade customers

Website visits

- October 1 – 17, 2022 we're at 5,423 unique visits to our assistance page. Same time last year we had 694 unique visits.
- Average time on page is 3:13.
- Website is translatable to 14 different languages



WEAF ADVISORY GROUP MEETING AGENDA
October 19, 2022
3:00 – 4:30pm

1. Welcome and roll call – *Shannon Steed*

Community Action Agencies	Contact
Blue Mountain Action Council	Sylvia Schaefer
Community Action Connections	Dalia Ochoa, Ben Franklin
Community Action of Lewis, Mason, & Thurston Counties	Dale Lewis, Shannon K
Coastal Community Action Program	Debbie Gregg
Chelan-Douglas Community Action Council	Vern Gurnard, Kristi Hills, Alan Walker
Kitsap Community Resources	Kandi Balandran, Julie Barleta
Lower Columbia Community Action Center	Deanna Dahlberg, Kathy Bates
NW Community Action Center	Jose Alvarez
OIC of Washington	Heidi Silva, Isidra Sanchez, Casandra Ochoa
Opportunity Council	Marie Stangeland, Lorena Shah
Community Action of Skagit County	Misty Velasquez
Snohomish County Human Services Dept	Constance Hockett, Manu Morgan
WUTC Staff	
Hannah Navarro, Andy Sellards, Andrew Roberts	
The Energy Project	
Ross Quigley	
Yochi Zakai	
Public Counsel	
Corey Dahl	
Cascade Natural Gas	
Pam Archer, Regulatory Analyst	
Chris Mickelson, Mgr Regulatory Affairs	
Byron Pfordte, Mgr Customer Experience	
Shannon Steed, Consumer Specialist	
Dan Tillis, Dir Customer Service	

NW Energy Coalition – Charlie Thompson
Dept of Commerce – Michelle Debell, Jeff Takahashi

2. Establishing recurring monthly meetings – *Shannon Steed*

These regular meetings are intended to improve communication and working relationships while we navigate new program design and requirements, resolve challenges, and discuss ideas. We'll attempt to determine a day and time that works for all members each month. Meetings will also be recorded but attendance will encourage the most productivity and ensure all are heard.

Shannon - These regular meetings are attended to improve communication and working relationships while navigating through new program design and requirements, resolve challenges and to discuss ideas. We'll attempt to determine the day and time that works for all members or as many members as possible. The meetings will also be recorded, but attendance will encourage the most productivity. Shannon will send out a doodle survey to everyone to determine best day/time. Once that is determined a meeting invite will be sent. We are planning on having a meeting in November.

Dan -We can communicate more frequently, therefore only having monthly meetings. We encourage attendance, dialog, interaction. You live in communities, see the needs, we need to learn/partner with you to better design programs to help as many customers as possible.

3. WEAF budget review for the 2022-2023 program year – *Shannon Steed*

The budget for the new program year will maintain current funding levels:

PY Budget: \$1,276,000 15% Increase: \$1,467,400 Additional 5% Soft Cap: \$1,531,200

Shannon -There are no changes to the budget for this year. We'll be using the same funding levels that we used for the previous year, including the 15% increase, and the additional 5% soft cap and so altogether that makes the total funding at just over \$1.5 million. The last program year just closed and there were \$440,000 that were unspent for WEAF funding. That money will carry over into the new program year and those funds are available now for you to use as needed.

Dan – We typically don't spend all of the money in a normal year. How can we reach more customers? Goal is to meet cap. Interested in ideas to get the word out. Send Shannon and others ideas.

4. LIHEAP Program Update for the 2022-2023 program year – *Community Action volunteer*

Are there any program changes for the new year? Will COVID-related programs continue?

Michelle DeBell – Big thing right now is water and wastewater benefits. There's federal money and state money for that. The contingency monies are still available depending on the contract and how far down that spin out sparse commerce goes. We opened on October 1st. I don't know that we've received all our money yet from the federal government. My understanding is it's coming, but systems wide open. We are aware that in addition, PSE has a proposal for increasing gas benefits as the price of natural gas goes up and we've been working with them. We will continue our hardship benefits at commerce, so that's also continuing. Covid funding – still getting money in 2022.

5. General Rate Case Order 09 Requirements Introduction – *Chris Mickelson*

These will be developed in advisory group monthly meetings over the course of the program year:

a. Implementing AMI

b. CBO pilot program development with \$73,00 budget for the first year

Refer clients to Comm Act – then submit grants and tax ID – agent received admin and \$25 referral fee. This was abandoned.

Shannon – You may recall last December, Cascade created a CBO program where CBO would refer their clients, who are our customers, to Community Action, they would process the application. They

submit the grants plus the CBO name and tax ID, agency would receive regular admin fee + \$25 referral fee. That design didn't fit with needs of agency at it was abandoned.

Chris Mickelson – Eligibility threshold standard is now 80% AMI or 200% that are in poverty level, whichever is greater. Currently reviewing WEAF annual funding levels. Renew in Fall – share in early summer. Discuss funding and take to commission. Another piece, CBO program – initial budget of \$73K first year, then up to 5% of annual WEAF budget each year. This would be a pilot for 3 years. Collaborate/review/delegate any changes during that time.

Dan – We were ordered to implement a pilot CBO program. Previous proposal has not been adopted. Important for group to help develop a CBO program that can be effective, and everyone supports. Would like input from those that have worked and implemented these in the past. Send input to Shannon. The 12 agencies in WA will help us make that successful.

Lorena – Will Cascade work directly with CBO or current WEAF agencies contracting with CBO?

Dan - Still in design – either/or/both. Up to everyone to decide.

6. Re-Introduction to CNG's AMPED program design proposal – *Dan Tillis*

Dan – We utilized Forefront economics to prepare/distribute the Low-income Needs Assessment report. We will send out again.

The AMPED Proposal is not final – Cascade is looking for input.

Low Income Report – Reviewed slides/Tier levels

200,000 customers in Cascade serving territory, about 176,000 or 88% of those have incomes over 150% - significant number. 25,000 customers income less than 150%.

Proposing we cap the assistance at 150%. SMI recommendation is 60% because the 4.3% energy burden is well below 6% guideline that has typically been used. That is why the tiers.

AMPED is an arrearage management program energy discount and so it combines arrearage management approach and ongoing monthly recurring energy discount. Again, this is a proposal.

Proposed Program Overview – We need your expertise and insight to make this successful. Launched in OR on Oct 1st. This is similar but appears to be working well without major hiccups. We can implement quickly and easy for agents to administer as they are familiar with program. Designed to provide greatest assistance to those most in need.

Qualification for arrearage management pledge or credit grant – past due balance

Just energy discount – no past due balance.

Self-Certify – agents/agency enters past due balance into calculator – calc tells us what discount and tier. Agency enters new portal. Company takes care of it from there. Pledge 1 x per year, Auto enrolls in energy discount program. In place for 24 months from date applied. If customer receives AMPED pledge, following year auto enroll for 24 months from there.

Company qualifies customers (prior assistance), or customer calls and indicates they heard about program. Help as many customers as possible and take burden off agencies.

Earlier in year suggested new calculation – combined arrears and energy discount. Enter customers income, household, past due balance – gives amount of arrears and energy discount. Decided not to do that because there was a big change in calculation. Goal is to give best benefit for customer. Current calculator is being used for OR now. Going away from energy usage. Using the customers past due or total bill amount is more effective.

Q – Lorena – Is it one calculator?

A – Dan – Yes, built in for household size, FPL, AMI, SMI.

Q – Misty – During COVID, people self-declare, then when verifying, the don't qualify. If they can get it easy way, won't go through process for other programs. Afraid of losing LIHEAP clients because they can get this program. Concerned about fraud. Customers upset because they can self-certify for one and not for others. Needs to be a way to discuss with the customers.

A – Dan - Good question, possibly valid. So far, still getting pledges through agencies. Fraud is a concern but believes more interest in self-certify. Discussion about auditing approximately 3% for those that self-certify vs providing to us. Train team – qualified for AMPED, understand local agency also has programs, and provide contact info.

Q – Hanna – Eligible once a year? One time grant?

A - Dan - Arrearage management once a year. Also qualify for monthly energy discount – reoccurring 24 months.

Q – Lorena – Self Cert – agree with company about clients and make it easy. Still have work to do around how we ask the questions to get the most accurate info. Would like to look at how questions are asked. When company self-certifying, are they are connecting to other agencies such as Weatherization program? How do they get referrals to Weatherization agency?

Dan – Would love to partner with you on how team members should ask the questions. Weatherization – terrific point – discussions on how they get customers set up on that – we do refer customers but could use your help to word that.

Q – Sylvia - 1 x per year -AMPED? Will need more help for LIHEAP as that does not include electricity. Doesn't think will hurt LIHEAP other than self cert.

A – Dan - Arrearage – 1 x per year. Energy discount 24 months, if customer contacts to get another pledge, will continue for 24 months. Winter help available as well, in addition to LIHEAP.

Q – Andrew – Audit process – who? AMPED first in April – modified from then?

A – Dan – Have not decided who – looking to partner with agencies, not sure if that is an option. If not, another 3rd party to help with that. Very similar to proposal from April. Haven't considered if customer does not pass the audit how to move forward. Possible change discount level or remove all together.

Byron – Covers natural gas, they still have electricity they need help with. If in need beyond just gas, agency still part of equation. Ultimately goal is to help customer.

Auto enroll – Either through agency or company for winter help. Auto enroll all LIHEAP customers, Auto enroll into OR if we have FPL or SMI. If no income or household size, FPL/SMI/ASI – auto enroll in lowest percent discount tier. Once they provide information, they can contact agency to qualify for correct tier. Look back 12 months for previously qualified for all assistance, auto enroll to monthly energy discount. Like to look at categorical eligibility. If customer qualifies for other assistance could auto enroll. Would like a list to auto enroll.

Assistance Levels and Funding – reviewed slide - Same as what was implemented in OR.

Initial proposal in April is what we are using in OR. It's a tiered assistance program. We solved at the energy burden for customers between 0-25%. FPL is 85%. Discounting bill by 95% helps! Lower that burden to under 6% - that's the way the tiers are designed for energy discount program.

Agents set up Pay Plans or arrangements at time the discount applied. We also reconnect customers who have been disconnected – qualify for discount and reconnect.

Why SMI over AMI? 6000 more customers in WA would be eligible for assistance using SMI instead of AMI. State median income helps with SMI. Also, less cumbersome to administer.

Q-Lorena – FPL – Current proposal what we are looking at – moving to 150%, not staying at 200% - correct?

A – Dan - Yes

Q- Corey -Customers don't qualify 100% -would they opt into payment plan?

A – Dan - Yes – CSR can provide pay plan for certain timeframe, if outside that, can escalate to our Credit/Collections Team. Would need them to honor. 90% - owe \$30 – wouldn't disconnect immediately. Give them time to pay. Open to going to 200%. Helping those that don't fall under – get consistently – rework the tiers. More in-depth conversation Corey/Yochi/Dan – Not parallel to electric

Oct 1, 2023 – implement (latest date). If agreeable, mid-year, that can be done as we are currently doing this now.

Send thoughts/ideas feel free to send to Chris, Dan, Shannon, Byron.

Q- Lorena- did it look at energy burden of customers or broader?

A - Chris – Later – future meeting, company come back and do a refresh. On slide 5 of report talks about what would it take to bring customers down to less than 6% energy burden.

Dan - Open to discuss options – send to Dan, Shannon, Byron, and Chris. It's important for us to get your input on how we can reach these underserved and disadvantaged communities. We would love your insight on we can do this better, and the CBO might be a big part, so we want your ideas and thoughts.

Open Discussion – Enrollment Growth and Outreach

- a. Strategies to reach more customers, especially under-served communities – *all members (this will be an ongoing meeting topic)*

Shannon- We need your feedback and ideas.

- b. Collecting outreach feedback from customers – *Byron Pfordte*

- c. WEAFF outreach plan for the program year – *Byron Pfordte*

See attachment with Bryon's outreach activities.

Q - Lorena – When someone pays online – ignores email, etc. – is there somewhere on their account that says “I need help” with my bill. Looking for robust approach, like trusted messenger.

A – Byron - Links to payment plans for energy assistance. Outreach is there, but a lot of times it's the same customers, need to reach those that don't typically come in, how do we get new applicants through

the door? Don't want them to become frustrated if there is a bottleneck. Want whole experience a good one for the customers.

Q- Corey – Statistics online portal – smart phone – ways to send push notifications who might be behind, or by zip where help is available?

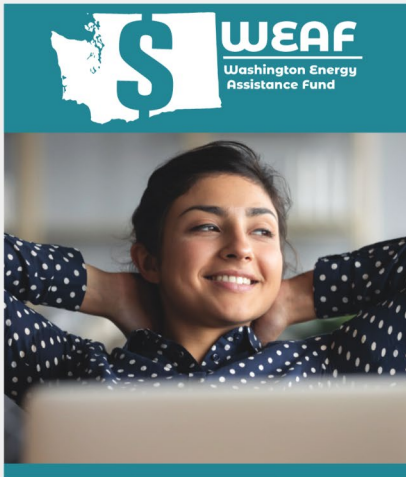
A – Byron - We don't have an app. Could be other ways to reach customers.

d. Other issues – *all members*

Shannon – Encourage ongoing discussions – don't have to wait for next meeting. Feel free to send ideas/suggestions.

Look for Doodle surveys for future meetings.

Meeting Adjourned



Financial assistance is available from Cascade Natural Gas to help with your utility bill. Our partners at Community Action process your application quickly and easily so you can get back on track.

These funds are available to anyone who qualifies, including those who have been negatively impacted by the COVID-19 pandemic. Learn how you can benefit from WEAF.

Call us at 888-522-1130 to speak with a Customer Service representative if you need to make payment arrangements for your bill. The phone number for your local Community Action agency can be found on the back of this insert or at www.cngc.com. *Los hispanohablantes están disponibles para servirle en Cascade Natural Gas y en cada agencia de Community Action.*



In the Community to Serve®

Community Action Agencies

For an appointment or more information, please call or visit online:

Blue Mountain Action Council

Walla Walla: 509-529-4980 | bmacww.org

Chelan-Douglas Community Action Council

Wenatchee: 509-662-6156 | www.cdcaac.org

Coastal Community Action Program

Aberdeen (Grays Harbor County):
800-828-4883 or 360-533-5100 | www.coastalcap.org

Community Action Connections

Pasco (Benton/Franklin Counties): 509-545-4042
Prosser: 509-786-3379 | www.bfcac.org

Community Action Council of Lewis, Mason, & Thurston Counties

Shelton (Mason County): 360-426-9726
or 800-878-5235 | www.caclmt.org

Community Action of Skagit County

Mount Vernon (Skagit County):
360-428-1011 | www.communityactionskagit.org

Kitsap Community Resources

Bremerton (Kitsap County): 360-479-1507 | www.kcr.org

Lower Columbia Community Action Council

Longview (Cowlitz/Wahkiakum Counties):
360-425-3430 or 800-383-2101 | www.lowercolumbiacap.org

NW Community Action Center

South Yakima County: 509-865-7630 | www.ncactopp.org

OIC of Washington

Yakima (Upper Yakima County):
509-452-7145 | www.yvoic.org

The Opportunity Council

Bellingham (Whatcom County): 360-255-2192
Oak Harbor (Island County): 360-679-6577 | www.oppco.org

Snohomish County Human Service Department

Everett (Snohomish County): 425-388-7200
snohomishcountywa.gov/191/Human-Services

www.cngc.com     

02/22

CNGC Energy Assistance Outreach October through April

- Bill Inserts
- Bill Onserts
- Social Media
 - Paid
 - Organic
- Google Ads
- Display
- Streaming Audio
- Emails
- Company Website
- Promotional Items
- Customer Service Representatives
- Field Technicians
- Letters

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on

Any unpaid delinquent balance not received by Feb 19, 2020, the bill cycle beginning date for the next month's bill, is subject to a late payment charge of 1% per bill cycle.

Gas Charges

BILLING PERIOD 12/19/19 - 1/21/20 **DAYS** 34

METER NUMBER [REDACTED]

METER READ DATE [REDACTED]

USAGE HISTORY (Therms)

Month	Usage (Therms)
1/1/19	280
2/1/19	320
3/1/19	280
4/1/19	100
5/1/19	80
6/1/19	80
7/1/19	80
8/1/19	80
9/1/19	80
10/2/19	80
11/1/19	120
12/1/19	280
1/21/20	320

	Jan '19	Jan '20
Average Daily Therms	9.33	9.53
Average regional temp	32	30
Days in billing period	30	34

CURRENT READING	PREVIOUS READING	DIFFERENCE (CCF)	ENERGY FACTOR	PRESSURE FACTOR	THERMS USED
7184	- 6888	= 296	x 1.106892	x 0.988472	= 324

Basic Service Charge \$5.00 per month
 Delivery Charge 324 Therms x \$0.27205
 Average Cost of Gas 324 Therms x \$0.43833
 Temp. Gas Cost Amortization 324 Therms x \$0.1353
 Energy Assistance Fund 324 Therms x \$0.00333
 Pipeline Replacement 324 Therms x \$0.0156
 Decoupling Mechanism 324 Therms x \$0.0139

Non-emergencies: Mon-Fri, 7 a.m. - 7 p.m.

Email: customerservice@cngc.com
 Mail: Cascade Natural Gas Corporation,
 Attn: Customer Service, PO Box 7608, Boise, ID 83707-1608. Please include your account number.

CALL BEFORE YOU DIG 811

Note: Charges for current services are due and payable upon receipt of bill and are past due as noted. **This bill does not extend the due date of past bills.**

Conservation 324 Therms x \$0.0263
 Protected EDIT 324 Therms x \$-0.00806
 Unprotected EDIT 324 Therms x \$-0.003005
 City Tax 6%


Total Gas Charges* [REDACTED]

*The cu

We have bill assistance options that can meet your needs.


WEAF

Washington Energy Assistance Fund



Scan the QR code with your smart device, or visit www.cngc.com/assistance to get started.

Asistencia financiera disponible en español.



MESSAGE CENTER: _____

🔗 Cascade Natural Gas can Help. Relief from financial stress is available to those who qualify through the Washington Energy Assistance Fund. Start by calling 888-522-1130. Agentes en español disponibles. Or, apply through your local Community Action Agency listed here: <https://buff.ly/3fwpNQJ>.

WEAF
Washington Energy Assistance Fund

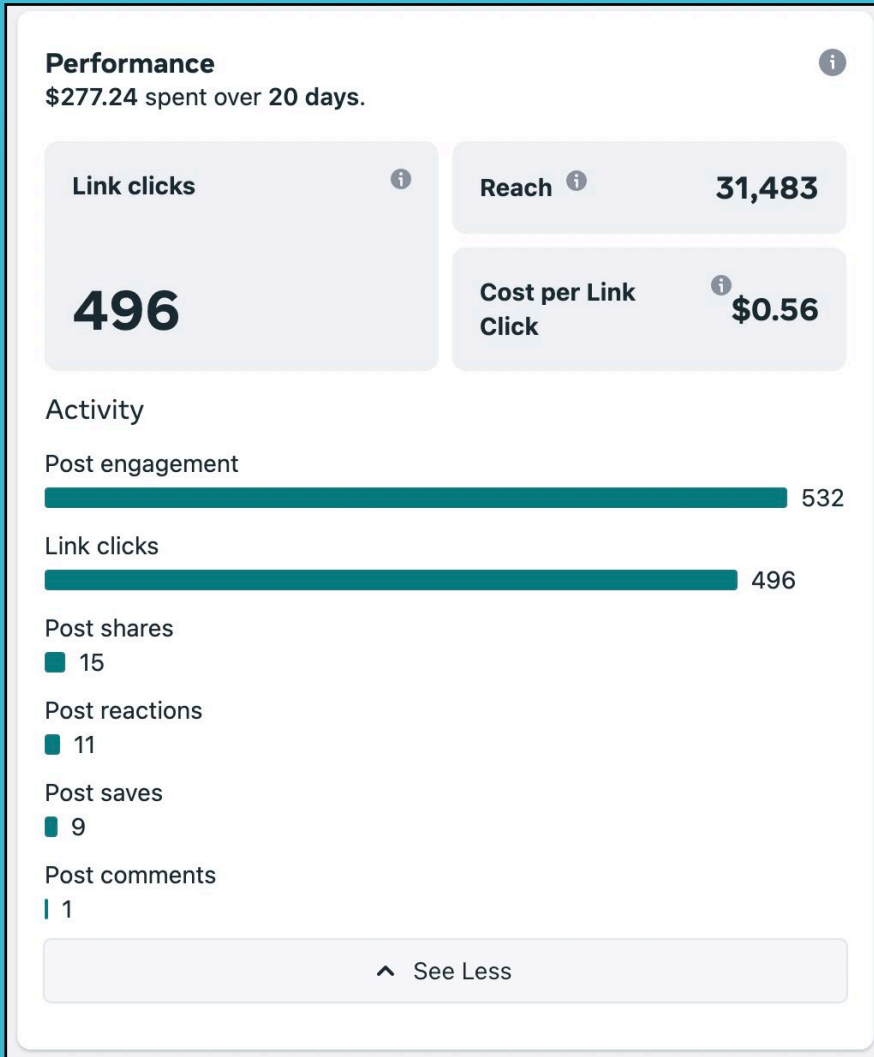
Making ends easier to meet
FOR INCOME-ELIGIBLE CUSTOMERS

CASCADE NATURAL GAS CORPORATION
A Subsidiary of MCUI Resources Group, Inc.
In the Community to Serve®

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● Ad group 1



Now, more help is available.

Individuals and families can receive the help they need.

Cascade Natural Gas

Ad	Impressions	Clicks
● Enabled	292,959	11

● Ad group 1



Energy Bill Assistance

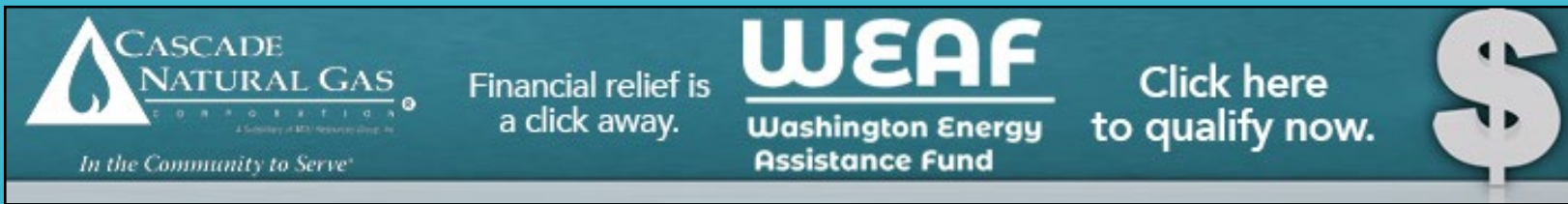


Ad	Impressions	Clicks	CTR
● Enabled	299,585	121	0.04%

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In the Community to Serve

Financial relief is a click away.

WEAF
Washington Energy Assistance Fund

Click here to qualify now.



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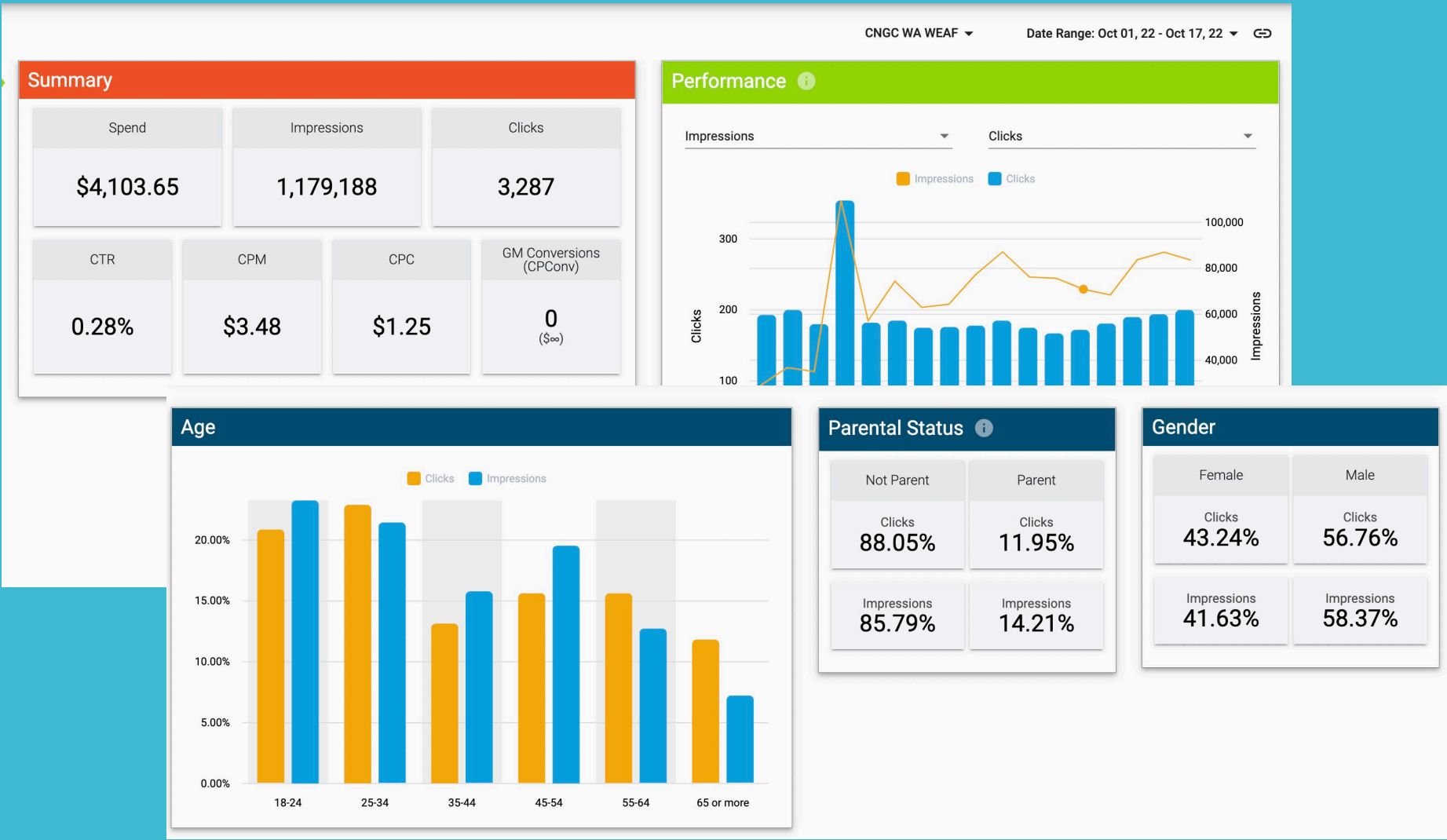
El alivio financiero está a un clic de distancia.

Haga clic aquí para calificar ahora.



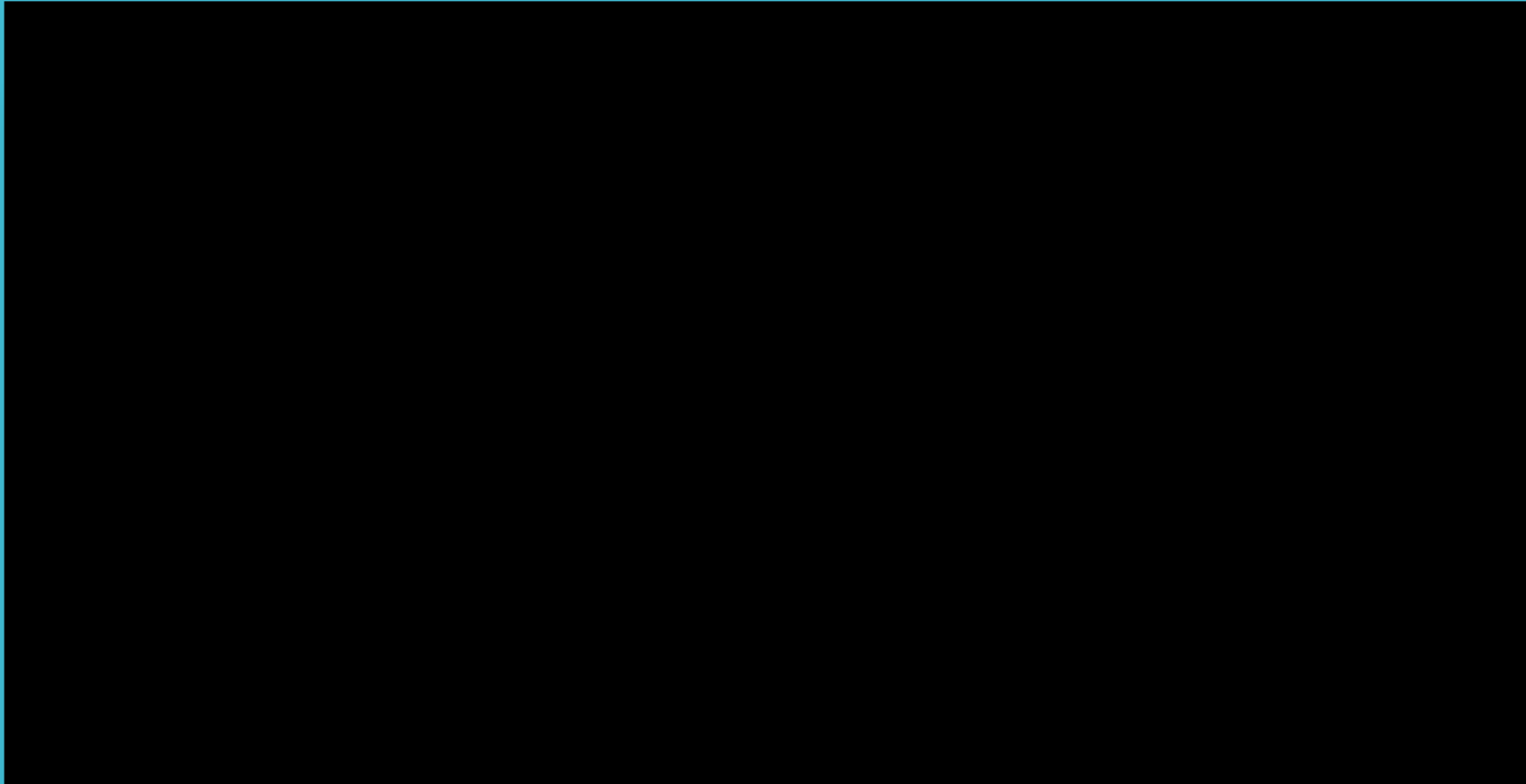
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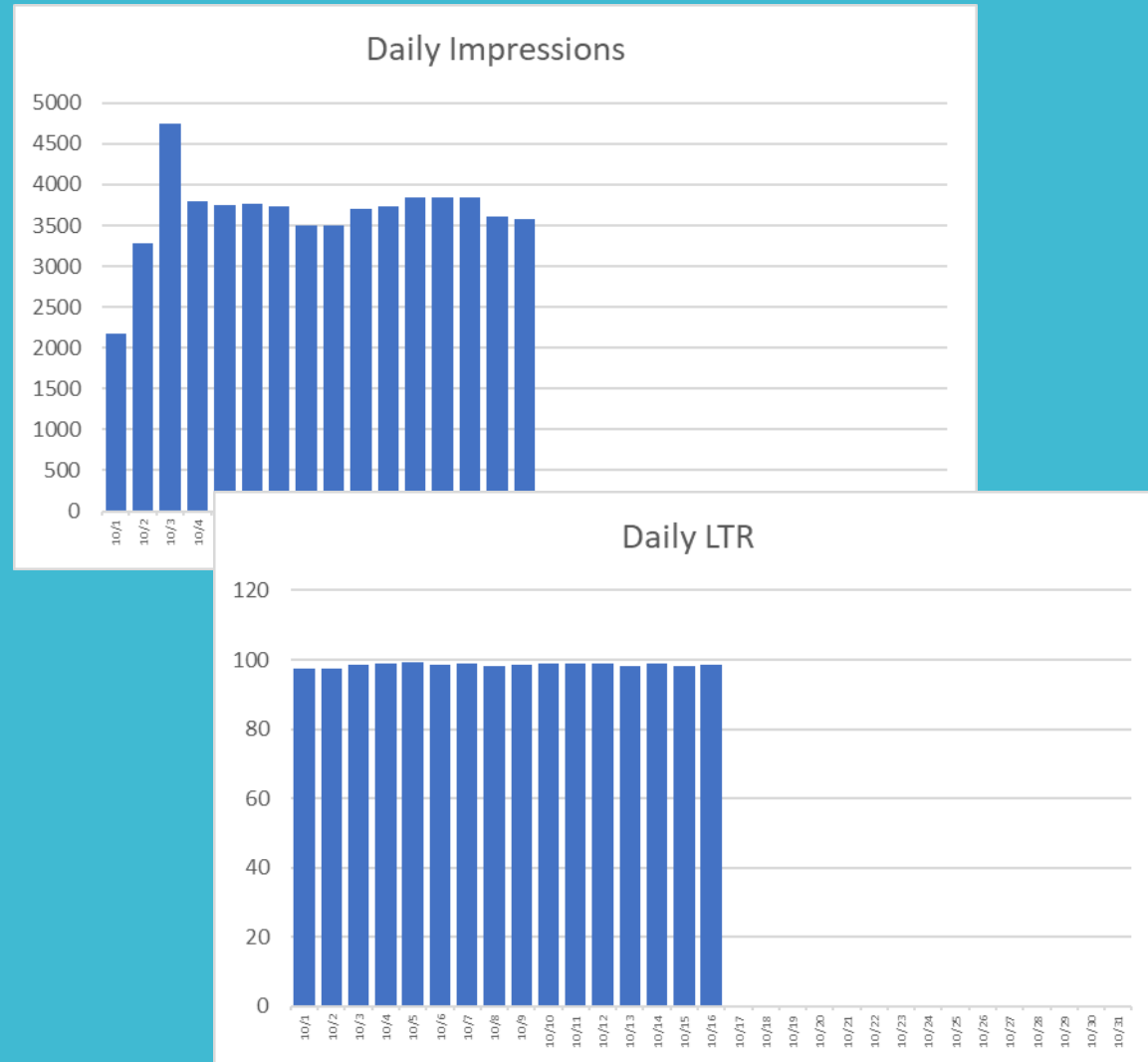


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- Through October 17th, 58,400+ impressions
- Planned net CPM was \$25 and the campaign is averaging \$30.03. October 16th was at \$32.54 and several other of the last seven days north of \$33 due to political advertising.
- Average listen thru rate coming in at an outstanding 98.5%



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Facebook Twitter Instagram YouTube LinkedIn

WEAF

Washington Energy Assistance Fund

RELIEVE THE BURDEN OF ENERGY COSTS.

Help with your Cascade Natural Gas bill is a call away.

Cascade Natural Gas believes a warm home, hot water, and natural gas energy should be available to everyone. That's why Cascade has established the Washington Energy Assistance Fund (WEAF).

Qualifying for assistance is easy through any of our partner Community Action Agencies. Qualified applicants may receive up to \$500 toward their Cascade bill each year and may qualify for other assistance options.

Get complete bill assistance information by clicking the button below.

[I NEED HELP WITH MY BILL](#)

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888-522-1130

EMERGENCY Information Contact Us Careers LOGIN

CASCADE NATURAL GAS
In the Community to Serve

Customer Service Safety & Education Rates & Services Energy Efficiency What's New?

ENERGY ASSISTANCE FOR LOW-INCOME HOUSEHOLDS

LIHEAP

The Low-Income Home Energy Assistance Program (LIHEAP) helps low-income households pay part of their energy bills. You can find out if you're eligible for this program and apply for help at one of the state agencies below. *Please note, these guidelines are updated periodically, so be sure to check back regularly.*

Income guidelines for LIHEAP

- Washington
- Oregon

Our LIHEAP brochure will also provide income guidelines, essential energy assistance facts and contact information in your area:

- Washington Energy Assistance - LIHEAP
- Oregon Energy Assistance - LIHEAP

English

888-522-1130

Información de emergencia Contáctenos Empleos Iniciar sesión

CASCADE NATURAL GAS
In the Community to Serve

De Primer Nivel Seguridad Y Educación Tarifas Y Servicios Eficiencia Energética ¿Qué Hay De Nuevo?

ASISTENCIA ENERGÉTICA PARA HOGARES DE BAJOS INGRESOS

LIHEAP

Programa de asistencia energética para hogares de bajos ingresos (LIHEAP) ayuda a los hogares de bajos ingresos a pagar parte de sus facturas de energía. Puede averiguar si es elegible para este programa y solicitar ayuda en una de las agencias estatales a continuación. *Tenga en cuenta que estas pautas se actualizan periódicamente, así que asegúrese de consultarlas periódicamente.*

Pautas de ingresos para LIHEAP

- Washington
- Oregón

Nuestro folleto LIHEAP también proporcionará pautas de ingresos, datos esenciales de asistencia energética e información de contacto en su área:

- Asistencia energética de Washington - LIHEAP
- Asistencia de energía de Oregon - LIHEAP

Asistencia de climatización

Cascade Natural Gas se complace en asociarse con los programas de asistencia de climatización en Washington y Oregon. Estas agencias de acción comunitaria y de bajos ingresos ofrecen mejoras gratuitas en la climatización del hogar y la eficiencia energética para las viviendas residenciales calificadas por ingresos que se calientan con gas natural. Comuníquese con su Agencia de Asistencia Energética para obtener información adicional o para solicitar asistencia de climatización.

Spanish

Chinese (Simplified)

English

French

Hmong

Indonesian

Japanese

Política de privacidad y cookies

CNGC Energy Assistance Outreach October through April

- Bill Inserts
- Bill Onserts
- Social Media
 - Paid
 - Organic
- Google Ads
- Display
- Streaming Audio
- Emails
- **Company Website**
- Promotional Items
- Customer Service Representatives
- Field Technicians
- Letters



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All Emergencies - 24-Hour Response (Including Outages)
Todas Emergencias - 24 Horas **888-522-1130**


Cascade Natural Gas offers many payment options that include phone, online, and in-person. For a complete list of payment options, locations, and details visit www.cngc.com and click "Payment Options."

Cascade Natural Gas Customer Service - Atención al Cliente
7:30 a.m. - 6:30 p.m. Monday-Friday (Lunes a Viernes)
888-522-1130 | www.cngc.com

IMPORTANT INFORMATION


Disconnection of service may be postponed upon receipt of a certificate from a licensed physician or public health official stating you or someone in your household has a serious illness or medical emergency that would be impaired by the loss of service.

Bill assistance is available for those who qualify by contacting Cascade Natural Gas Customer Service. More bill assistance information is at www.cngc.com/assistance or by scanning the QR code.








A complaint may be filed with Cascade or the Commission.


- Public Utility Commission of Oregon: 800-522-2404 or write to PO Box 1088, Salem, OR 97308-1088, www.oregon.gov/puc
- Washington Utilities and Transportation Commission: 888-333-9882 or write to PO Box 47250, Olympia, WA 98504-7250, www.utc.wa.gov
- Cascade Natural Gas Corporation: 888-522-1130 or write to PO Box 7608, Boise, ID, 83707-1608, www.cngc.com



CASCADE NATURAL GAS
CORPORATION
A Subsidiary of NGA Resources Group, Inc.

In the Community to Serve

www.cngc.com     



811 Know what's below.
Call before you dig.

CNG 335 PartA(10/2022)

PAGE 1 of 1

CASCADE NATURAL GAS CORPORATION
In the Community to Serve®
www.cngc.com

SERVICE FOR: [REDACTED]
ACCOUNT NUMBER: [REDACTED]
NOTICE DATE: March 10, 2021
MUST BE PAID BY: March 17, 2021
AMOUNT DUE: \$729.81

▶▶▶ Past Due Notice ◀◀◀

Dear Customer:

- We have not received payment on your Past Due Account. To avoid discontinuance of service, payment must be received, or arrangements for payment made with us prior to 5 p.m. on March 17, 2021.
- Payments may be made at local paystations. Please contact Cascade Natural Gas Corporation at 888-522-1130 or visit www.cngc.com for payment locations. **Please notify us if payment is made at a paystation.**
- To make a debit, credit card, or check-by-phone payment, simply call our customer service number and follow the prompts to be connected with our independent service provider. A convenience fee for each transaction will apply. **Please notify us if payment is made by credit card.**
- If service has been disconnected and payment is received after 12 p.m., service may not be restored until the following business day.
- Payment on past due balances with a returned check may result in discontinuance of service without further notice.
- If you are experiencing a financial hardship, contact us for individualized payment plan options. Cascade Natural Gas offers the following no-strings attached services directly, or is able to get you in contact with local Community Action Agencies for additional assistance to help get your account current:
 - Payment Plans (each designed to fit your budget)
 - Hardship Grants
 - Washington Energy Assistance Fund (WEAF)
 - Winter Help
 - Low Income Home Energy Assistance Program (LIHEAP)

If payment has been made, please disregard this notice. Thank you.

Payment Must Be Received by 5pm ▼

March						
9	M	T	W	T	F	S
1	2	3	4	5	6	
7	8	9	10	11	12	13
14	15	16	17	18	19	20
21	22	23	24	25	26	27
28	29	30	31			

PLEASE KEEP THIS PORTION FOR YOUR RECORD.
PLEASE RETURN THIS PORTION WITH YOUR PAYMENT, MAKING SURE THE RETURN ADDRESS SHOWS IN THE ENVELOPE WINDOW.

CASCADE NATURAL GAS CORPORATION
ACCOUNT NUMBER: [REDACTED]

DUE BY
March 17, 2021

AMOUNT DUE
\$729.81

Please enter amount enclosed

\$

Write account number on check and make payable to CNG Corp.

PO Box 5600
Bismarck, ND 58506-5600

47960753901100000000000000000000

SERVICE FOR: [REDACTED]
BLAINE, WA 98230-9585

ACCOUNT NUMBER: [REDACTED]
NOTICE DATE: [REDACTED]

DUE DATE: [REDACTED]
Past Due BALANCE: [REDACTED]

▲ URGENT NOTICE ▲

[REDACTED]
Seattle, WA 98117

We have not received payment for the past due amount on your account.

Our desire is that your Cascade Natural Gas account remain in good standing. To do so, the outstanding balance needs immediate attention. Your outstanding balance is [REDACTED].

If you are unable to pay your bill in full at this time, contact Customer Service at 888-522-1130 between 7:30 a.m. and 6:30 p.m., Monday through Friday to discuss payment arrangements or other options to continue service.

If you are experiencing a financial hardship, contact us for individualized payment arrangement options. Cascade Natural Gas offers the following no-strings attached services directly, or can get you in contact with local Community Action Agencies for additional assistance to help get your account current:

- Payment Plans (each designed to fit your budget)
- Hardship Grants
- Washington Energy Assistance Fund (WEAF)
- Winter Help
- Low Income Home Energy Assistance Program (LIHEAP)

Thank you for your cooperation in this matter. Our goal is to minimize hardships and for you to continue your service uninterrupted.

Cascade Natural Gas Customer Service
888-522-1130

Monday - Friday, 7:30 a.m. - 6:30 p.m.
www.cngc.com

CASCADE NATURAL GAS CORPORATION
In the Community to Serve®

CNGC Energy Assistance Outreach

October through April

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November 18, 2022

Ms. Amanda Maxwell
Executive Director and Secretary
Washington Utilities & Transportation Commission
621 Woodland Square Loop SE
Lacey, WA 98503

Regarding: UG-210755 Compliance Filing to Commission Request for Updates to Advisory Group Pursuant to Order 09

Dear Ms. Maxwell:

In compliance with Paragraph No. 78 of Order 09 in Docket No. UG-210755, Cascade Natural Gas Corporation encloses for filing documents from its November 16, 2022, WEAFF Advisory Group meeting. Also enclosed are documents distributed by The Energy Project, NW Energy Coalition, and Public Counsel for discussion at that meeting. Also enclosed are meeting minutes from the November 9, 2022, WEAFF Small Group meeting held prior to the November 16th meeting of the WEAFF Advisory Group. The following documents are submitted electronically as part of this filing:

- UG-210755-CNGC-Fall-2022-Energy-Assistance-Term-Sheet-11-18-2022
- UG-210755-CNGC-Nov-WEAF-AG-Agenda-and-Minutes-11-18-2022
- UG-210755-CNGC-TEP_Feedback-on-CNG-BDR-11-18-2022
- UG-210755-WEAF-Small-Group-Meeting-Agenda-and-Minutes-11-18-2022
- UG-210755-WEAF-Advisory-Group-Meeting-Transcript-11-18-2022

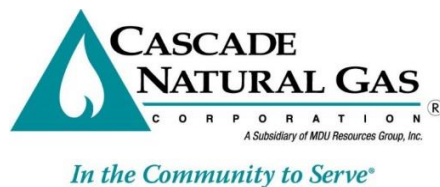
If you have any questions, please contact me at 208.377.6015 or Chris Mickelson at 509.734.4549.

Sincerely,

Lori Blattner

Lori Blattner
Director, Regulatory Affairs
Cascade Natural Gas Corporation
8113 W. Grandridge Blvd.
Kennewick, WA 99336
Lori.blattner@intgas.com

Attachments



WEAF ADVISORY GROUP MEETING AGENDA
November 16, 2022: 3:00 – 4:00pm

1. Welcome and roll call – *Shannon Steed*

Community Action Agencies	Contact
Blue Mountain Action Council	Sylvia Schaefer
Community Action Connections	Dalia Ochoa
Community Action of Lewis, Mason, & Thurston Counties	Dale Lewis, Sandra Koch
Coastal Community Action Program	Debbie Gregg
Chelan-Douglas Community Action Council	Vern Gurnard, Kristi Hills, Alan Walker
Kitsap Community Resources	Kandi Balandran, Julie Barleta
Lower Columbia Community Action Center	Deanna Dahlberg, Kathy Bates
NW Community Action Center	Jose Alvarez
OIC of Washington	Heidi Silva, Isidra Sanchez, Casandra Ochoa
Opportunity Council	Marie Stangeland, Lorena Shah
Community Action of Skagit County	Misty Velasquez
Snohomish County Human Services Dept	Constance Hockett, Manu Morgan
WUTC Staff	
Hanna Navarro, Andrew Roberts, Andy Sellards	
The Energy Project	
Ross Quigley, Yochi Zakai	
Public Counsel	
Corey Dahl	
NW Energy Coalition	
Charlee Thompson	
Department of Commerce	
Michelle DeBell	
Cascade Natural Gas	
Pam Archer, Regulatory Analyst	
Chris Mickelson, Mgr Regulatory Affairs	
Byron Pfordte, Mgr Customer Experience	
Shannon Steed, Consumer Specialist	
Dan Tillis, Dir Customer Service	
Mark Chiles, VP of Regulatory Affairs & Customer Service	

2. Presentation of *Fall 2022 Energy Assistance Term Sheet*, attached, by The Energy Project, Public Counsel, NW Energy Coalition, 40 mins

Yochi – Reviewed Cascade Fall 2022 Energy Assistance Term Sheet

Corey – Concerned no clear explanation of how the outreach would happen for new customers. Would only reach existing customers. Collaborative agreement on inclusive outreach to all customers.

Charlee – Involved in Avista’s low-income advisory committee specific to build discount programs. Process that works well, each meeting has a specific discussion based on topic. Having that planning process works well. Suggest for these meetings.

Dan – 1E – Just want to clarify this is not just for customers who have participated in past – it is for all who needs assistance. Opt in any customer who has had assistance in the past. They can seek approval through company for discount program. As in OR, we would have a comprehensive outreach program. We do not exclude any customers.

Corey – That was my understanding. Just concern that motivation for the Commissioners request was that bills would increase significantly due to no steps for mitigation. Inclusive outreach for all/as many customers is brought forward.

3. Bill discount rate issue identification, by Advisory Group, 10 mins

Yochi – Reviewed TEP Feedback on Cascade Bill Disconnect Rate Proposal

Corey – Reiterate public counsel’s commitment to make sure we meet and have a shared goal of getting assistance to our customers – take time necessary to work out the build discount program.

Yochi - Not opposing interim program – just want to talk about everything first.

Dan- Mentioned in past, we’re open to some sort of arrearage forgiveness targeting to customers verified as need in past or now. Regarding 2A – not precise enough to help customers who would likely be in need or have exhibited need in past. Open to discussion options, no leftover funds. Is now the time or wait until higher rates go in affect? On number 3, - good ideas – we need to talk internally and get a consensus.

Hanna – 2 options for interim assistance are both good ideas we should explore.

Yochi– Reviewed TEP Feedback document

Provisions made to leverage funds. Some may be eligible for LIHEAP providing doc – number of customers may exempt due to immigration status.

Dan – Heightened threshold – Cascade moved to 200% FPL 2019. We don’t have 80% AMI integrated yet, due to complexity of calculator and timing.

Corey – Continued with document.

Hannah – Not enough time in process to determine details. A lot of questions.

Dan – Haven’t gotten into the details, no agreement on temporary program. Have temporary energy discount program in place in OR now (been in place since Oct 1). Some things brought forward, we’re still working to address and will work through next couple of months. Appreciate your feedback on the energy discount program. We are committed to have a program in place, and the goal is to get as much help to all customers. We will review the documents and discuss in the next upcoming meetings.

4. Clarification on intent to file a bill discount rate this week or not, by Cascade, 5-10 mins

Dan – With disappointment, Cascade will not move forward filing temporary energy disc program. Disappointment is that we firmly believe it’s the best way for mitigation during the winter season with the new rates through the PGA. Gives customer monthly recurring discounts that help with bill rates every month instead of increasing rates in spring. Ready to move forward with working with advisory group to address concerns and we know the Oct 1, 2023, is still a good goal. Will take time to address issues. Hold off on filing. Next steps, meet internally to talk and digest, then have a follow up meeting.

Yochi – Understandable you have not been able to digest everything. Thank you for listening and agreeing not to file. Willing to put in time to get it done.

Corey – Appreciate you receiving feedback. Confident can get forms of immediate relief to customers and in a way, it can be administered. Work through discount program that we feel good about and will be successful. All players prepared to implement.

Dan – Options for arrearage forgiveness grant – working to better understand NWN, Puget and other utilities. In contact with Forefront economics. See if their approach might help higher level of accuracy to determine the customers. #3 – Shannon will start looking at what those changes would look like. Add 25% to past usage, not bill amount, current calculator works on energy usage. Typically, don't get near CAP so room to work, ask for more if needed. Could have 16 AMI calculators, 1 for each country. 1 for FPL and 1 for AMI. Would choose best assistance for customer. Open to feedback, other options.

Michelle – Advise not to use 2 calculators. Complicate things.

Dan – Yochi – maybe you can look to see if there are other options, or if agencies would be ok with utilizing 2 calculators.

Michelle – Calculation is what it is – income vary county/county

Chris – Our benefit curve is built on the FPL and having it provide AMI for 16 counties would take some time to incorporate, unless the CAAs would like to have 17 different calculators, 16 AMI for each county and 1 for FPL. Cascade will need to investigate the AMI chart for PSE that Yochi provided and how its incorporated into their usage benefit curve calculator, if at all.

Dan – We will work to get it done as soon as we can.

Sylvia – Calculators not affecting agencies – tabs at bottom now. Information received is a lot – they will adjust to changes – they will do what is best for customers. Appreciate CNG working so closely with us.

Dan – Appreciate feedback. Chris – look at 2 calculator model for Sylvia's agency, see how it works, then expand.

5. Next steps, by all, 5 mins

Dan - Small group meeting next week. Committed to meet more often.

Yochi – We've been vague to "small group", there are multiple agencies, if any others interested, reach out to get added.

Meeting Adjourned

SHUTE, MIHALY
& WEINBERGER LLP

396 HAYES STREET, SAN FRANCISCO, CA 94102
T: (415) 552-7272 F: (415) 552-5816
www.smwlaw.com

YOCHANAN ZAKAI
Attorney
yzakai@smwlaw.com

November 16, 2022

Via Electronic Mail

Cascade Washington Energy Assistance Fund
Advisory Group

Re: The Energy Project's Feedback on Bill Discount Rate Proposal

Dear Cascade Washington Energy Assistance Fund Advisory Group:

Cascade requested written feedback on its Bill Discount Rate (BDR) proposal by Wednesday November 16, 2022. Accordingly, below you will find the feedback of The Energy Project (TEP).

TEP supports the Cascade Fall 2022 Energy Assistance Term Sheet provided jointly today by members of the advisory group. As a part of this, we request that Cascade hire a third party with experience working with vulnerable populations to set the agenda and facilitate future meetings on this topic. This is necessary because TEP does not feel that Cascade's facilitation of meetings provides an appropriate opportunity for advisory group members to explain their concerns or present alternative proposals.

Further, we request that future BDR program discussions focus on one element of the BDR program at a time, instead of covering the entire program design in one meeting. An in-depth discussion of individual program elements will allow participants to think through each aspect of the BDR program design and Cascade to more carefully design its BDR proposal.

If you have any questions, please do not hesitate to contact me or Lorena Shah.

Very truly yours,

SHUTE, MIHALY & WEINBERGER LLP

Yochanan Zakai

TEP Feedback on Cascade Bill Discount Rate Proposal
November 16, 2022
Page 2

1. Design the BDR to maximize use of federal funds and minimize impacts to all ratepayers, e.g., LIHEAP and CSBG.
 - a. Calculating LIHEAP and BDR benefits: The program design should maximize the use and availability of federal funds, including LIHEAP. The proposal presented by Cascade appears to apply the bill discount rate before LIHEAP, which would mean that customers and other ratepayers miss out of a significant amount of federal funding. TEP proposes that the Company apply LIHEAP grants to a customer's bill before applying the BDR, thereby preserving the customer's original billing totals for the purposes of LIHEAP. That sequence ensures that customers get significant benefits while conserving ratepayer funds through effective use of federal funding.
 - b. Develop a to plan maximize the use of federal LIHEAP and CSBG funding: The Company and CAAs should develop a plan to encourage customers that are able to provide the documentation needed for LIHEAP enrollment and information necessary to support federal funding. A key part of this plan will be an effective script for utility call center representatives vetted by CAAs.
 - i. Information sharing: When customers enroll in the program, what information must customers provide? And what customer information do utilities share with CAAs? Cascade's program proposal does not answer these questions.
 - ii. The advisory group requires specific information on customer served in order to monitor program efficacy (including for equity considerations and statutory compliance). CAAs require specific information to enroll customers in other benefits such as LIHEAP, weatherization, childcare, rental, banking, water assistance, ect; and maintain eligibility for federal Community Services Block Grants (CSBG) and other funding.
 - iii. Cascade should collect and provide to CAAs the information that CAAs need to monitor program efficacy, equity in program delivery, and to maintain federal CSBG funding. The advisory group should identify the data that a utility is required to collect from enrolled customers and provide to the CAA. Data points that some CAAs report needing for federal CSBG funding include: name, address, zip code, email, fuel sources, gender, birth date, ethnicity, race, education level, disability status, income, number of individuals residing in household, veteran status, preferred language, health insurance, citizenship status, work status, substance abuse, and mental health.

TEP Feedback on Cascade Bill Discount Rate Proposal
November 16, 2022
Page 3

2. The BDR should serve customers with incomes above 200% FPL: At minimum, the bill discount rate should use the eligibility the Commission approved for the WEAF program in the last GRC.¹
3. Accessing other CAA services via referral: When a utility enrolls a customer, how can we ensure that customers know about and receive other services offered by CAAs? Cascade's program proposal does not answer this question.
 - a. Background: CAAs administer a range of important assistance programs, including weatherization, LIHEAP, childcare, rental, banking, food, and water assistance, among others. Implementation of BDR and AMP should include sufficient procedures to connect customers enrolled by a utility to other services and benefits provided by CAAs.
 - b. Referral process: Cascade has not presented a plan for how the referral process will work.
 - i. Cascade and CAAs should jointly design the script the call center uses, as well as written and electronic communication to the customer about the BDR.
 - ii. Cascade should collect and provide to CAAs the information that CAAs need to follow up with customers, monitor program efficacy, equity in program delivery, and to maintain federal CSBG funding. Enrollment in the program automatically results in sharing customer information with the CAA. Customers cannot opt-out from information sharing, which serves both as the referral and plays an important role in program administration.
 - c. Tracking referrals and targets for enrollment in other services: Cascade and CAAs should track and include in regular reports the number of customers who proceed from utility enrollment to CAA intake and eventually receive weatherization and other services. The advisory group should set a target for the percentage of customers who enroll through the utility and proceed to a CAA intake so that we can monitor and continuously improve referral practices.
 - i. This is necessary because outreach by CAAs to customers, a.k.a. cold calling, is resource intensive and historically has not been effective. To overcome this known barrier, the program design should facilitate and incentivize customers to proactively connect with CAAs and Cascade to support this effort.
4. Outreach Plan: Cascade should provide a plan to conduct additional inclusive outreach, particularly through community partnerships. The plan should include specific steps, timeline for implementation, and commitments to funding outreach efforts.

¹ Docket UG-210755, Order 09, ¶ 75.

TEP Feedback on Cascade Bill Discount Rate Proposal
November 16, 2022
Page 4

5. Enrollment, including self-attestation of income and audits for verification.
 - a. Background: The program should serve the greatest number of customers while ensuring public trust and confidence. Self-attestation of income is an effective tool to increase enrollment. Other states that allow customers to self-attest to income, and to monitor instances of fraud and changes in income level they audit between 3% and 10% of self-attestations. Audits should be staggered over time as not to strain CAA resources at any particular time of year.
 - b. Self-attestation: TEP supports the use of self-attestation for initial enrollment in the program, provided the information sharing and referral processes discussed above are documented supported by the advisory group.
 - c. Selecting customers for audits: The program should use transparent and equitable guidelines for selecting customers to audit. TEP opposes program approval until the Company and advisory group jointly agree on how to select the customers that will be audited, and how the need for such documentation is communicated to customers.
 - d. Type of income: No details about the income requirement are provided in Cascade's program proposal. Questions that should be answered before implementing the program include: Are customers self-attesting to net income or gross income? What time period does the self-attestation of income cover? What time period does the audit of income cover? Does the reporting income include deductions in alignment with LIHEAP? Is an additional self-attestation form required for customers enrolled in the lowest income tier?
 - e. Length of enrollment: Cascade's program proposal does not identify what happens to enrolled customers after the interim program ends on September 30, 2023. Questions that should be resolved before Cascade implements the program include: After a customer enrolls, how long do they stay enrolled in the BDR? After the initial enrollment period can the customer re-enroll with another self-attestation, or is income documentation required at that time?
 - f. Changes in income: Cascade's program proposal does not identify what happens when a customers' income changes. Are customers expected to report upward changes in income if enrolled? Can customers report a lower income to qualify for a better discount rate, and if so is documentation required?
 - g. Time to provide documentation: Cascade's program proposal does not identify the time in which customers must provide documentation. Before requesting approval of the program, Cascade and the advisory group should determine: After a customer is selected for audit, how much time do they

TEP Feedback on Cascade Bill Discount Rate Proposal
November 16, 2022
Page 5

have to provide documentation of income to the CAA? Is this time period from enrollment date or from notification of selection for audit? If, after an audit, documentation shows that the customer's income is above the eligibility threshold, can Cascade retroactively claw-back any benefits provided under the BDR? If a customer is audited and does not provide sufficient documentation of income in time, can the customer reapply, and if so is documentation required?

- h. Responsibility for conducting audits: Any requirement for audits must consider CAA capacity constraints and funding needs. CAAs can satisfy the audit requirement by confirming a customer is enrolled in another government benefit program that requires incomes verification. This could be streamlined if the Department of Social and Health Services (DSHS) provided CAAs access to the Benefit Verification System (BVS) for enrollment in all CAA-provided programs, including energy assistance.
- i. Auto-enrollment: TEP opposes automatic enrollment of customers until a plan for maximizing federal funding is developed and vetted by the advisory group. After such a plan is in place, TEP would support automatically enrolling all customers who have had their income verified in recent years, and automatic reenrollment anytime the CAA verifies the customer's income.
- j. Utility and CAAs design a joint communications plan:
 - i. TEP opposes program approval until the Company and advisory group jointly agree on a communication plan concerning customers to fail to provide documentation or are not eligible. TEP wants to ensure that the Company and CAAs communicate that benefits are not being "taken away," but rather that enrollment based on self-attestation is temporary and enrollment after a certain date depends upon the customer providing income documentation if requested.
 - ii. Other elements of a communication plan include a start-up communications and a plan for responding to media inquiries about eligibility and instances of fraud. Approval of the BDR without a plan for addressing media inquiries concerning fraud risks jeopardizing public and political support of self-attestation programs across the state. Rushing to implement an interim program for one utility should not jeopardize the use self-attestations statewide.

TEP Feedback on Cascade Bill Discount Rate Proposal
November 16, 2022
Page 6

6. Design of income-based tiers. Cascade proposes to use the following tiers:

Tier	Tier Levels	Energy Discount
1	0-25% FPL	90%
2	26-50% FPL	70%
3	51-100% FPL	40%
4	101-200% FPL	5%

- a. TEP supports a five-tiered rate.
 - b. For the purpose of an interim program, TEP does not oppose the rate for Tiers 1-3.
 - c. TEP opposes the discount provided in Tier 4. If an interim program includes four tiers, Tier 4 should provide a discount of 25%.
7. CAA funding: TEP opposes approval of the program using the current CAA funding mechanism because the BDR is likely to require additional work for the CAAs without a funding mechanism. TEP proposes moving away from a paypoint structure and instead provide the CAAs 21% of the total annual WEAFF budget. PSE and Avista fund their energy assistance program by providing a similar percentage of program budgets to CAAs. The advisory group should consider if additional payment is needed for the CAAs to follow-up on referrals and perform audits.
8. Arrearage Management Plan (AMP)
- a. Cascade has not proposed a traditional arrearage management program that would forgive a certain amount of the past-due balance with each on-time payment. What Cascade characterized as an AMP to its advisory group does not meet the traditional definition of an AMP. TEP requests that Cascade stop using the name AMP in reference to its proposal, and to develop a traditional AMP.
 - i. For the lowest income customers, e.g., 0-50% FPL, immediate forgiveness of all past-due balances.
 - ii. For other eligible customers, forgiveness of certain percent of past-due balances after on-time payment.
 - iii. Retain a hardship grant program for all residential customers experiencing a hardship or emergency regardless of income, separate from the arrearage management program.²

² For example, Avista's Emergency Share provides grants not to exceed \$350 to any customers with a hardship or risk of service disconnection.

TEP Feedback on Cascade Bill Discount Rate Proposal
November 16, 2022
Page 7

9. Reporting: The advisory group should discuss what changes to energy assistance annual reporting and evaluation, beyond the referral tracking and goals discussed above, are necessary.

Cascade Fall 2022 Energy Assistance Term Sheet

Presented by: The Energy Project, NW Energy Coalition, Public Counsel

- 1) Do not file for or ask the Commission to approve of a new bill discount rate until Cascade:
 - a) Reviews the written concerns raised by the advisory group and discusses them with the advisory group.
 - b) Listens to presentations from the advisory group discussing their concerns.
 - c) Participates in at least 90 consecutive minutes of advisory group meetings every other week. At these meetings, Cascade will engage in good faith, with the spirit of productive conversation, collaboration, and compromise, to reach our shared goal of helping more customers.
 - d) Hires a third party, with experience working with named communities, to set the agenda and facilitate WEAFA advisory group meetings and bill discount rate meetings at least until a permanent bill discount rate is implemented.
 - i) This is necessary because Cascade's facilitation of meetings does not provide an appropriate opportunity for advisory group members to explain their concerns or present alternative proposals.
 - ii) We request that future BDR program discussions focus on one element of the BDR program at a time, instead of covering the entire program design in one meeting. An in-depth discussion of individual program elements will allow participants to think through each aspect of the BDR program design and Cascade to more carefully design its BDR proposal.
 - iii) After each meeting, Cascade will provide meeting notes and respond in writing to any unresolved questions.
 - e) Provides a plan to conduct additional inclusive outreach, particularly through community partnerships. The plan should include specific steps, timeline for implementation, and commitments to funding outreach efforts.
- 2) As soon as possible, provide residential customers in need immediate assistance by automatically forgiving arrearages. We are open to identifying residential customers in need of arrearage forgiveness in many ways, including but not limited to:
 - a) Providing automatic arrearage forgiveness to all residential customers with arrearages that are a certain number of days past due and above certain dollar amount.¹
 - b) Using third-party data to identify residential customers in need. For example, PSE purchased data from Experian, and NW Natural purchased data from Epsilon, for this purpose.²

¹ This August in Docket UE-220656 and UE-220566, Avista used existing LIRAP funds to provide automatic grants up to \$350 for customer with a 60 day past-due amount larger than \$100. The Commission accepted the existence of a 60 day past-due amount larger than \$100 as an "estimate" of customers who are low-income qualified and did not require further documentation. Avista used approximately \$2.4m for the program and \$6m remained in the LIRAP program account after the grants.

² In Docket UE-210792 and UG-210792 PSE distributed approximately \$34.587 million of COVID-19 funds to help customers in arrears. PSE automatically provided grants to customers whose household income below 200 percent of the federal poverty level and had an arrear. To (footnote continued on next page)

- c) Using known low-income customers whose income was verified by a CAA in the past two years.
- 3) As soon as possible, raise the WEAF income eligibility threshold and, adjust the benefit calculation to account for the purchased gas adjustment rate increase.
 - a) On August 23, 2022, the Commission ordered Cascade to “raise the [WEAF] income eligibility threshold to 80 percent of area median household income (AMI) or 200 percent of the federal poverty level, whichever is higher.”³ We support increasing the WEAF income eligibility threshold as soon as possible.
 - b) For the 2022-2023 program year, adjust the benefit calculation by adding 25% to prior bill amounts, to account for the purchased gas adjustment rate increase of 23% and the GRC increase of 2%.⁴ Adjust the maximum benefit amount allowed per customer by adding 25%.

1588126.3

determine eligibility, PSE purchased Experian data to estimate household income. PSE estimated household size based on the average size of households in the customers census block. The maximum benefit was \$2,500.

In Docket UG-220358 NW Natural used COVID-19 funds to provide automatic grants up to \$2,500 per household for two groups: 1) customers with past-due amount who received energy assistance in the past 2 years, and 2) “Using data from a third-party, NW Natural proposes to identify past-due customers who earn up to 200% FPL for auto-enrollment for CAP grants. NW Natural has acquired Total Source Plus data from a third-party, Epsilon, which derives the data from multiple sources including census data. The Total Source Plus data set includes household size and income data. Analyzing this data and cross-referencing it with our customer data, we have identified approximately 400 customers in arrears who earn up to 200% FPL that qualify for grants totaling about \$100,000. NW Natural’s proposal to add an auto-enrollment using this data will enable these grants to be applied.” Northwest Natural used approximately \$100k for customers identified used the Epsilon data, and had approximately \$450k remaining for the program after the grants.

³ Docket UG-210755, Order 09, ¶ 75.

⁴ PSE implemented a similar change to its HELP program after the 2022 PGA increase, and agencies are recalculating awards issued prior to the change to make sure that every customer served in the 2022-2023 program years gets the increased award.

From: Steed, Shannon

Sent: Wednesday, November 9, 2022 4:31 PM

To: Blattner, Lori <LORI.BLATTNER@intgas.com>; Mickelson, Christopher <Christopher.Mickelson@cngc.com>; Chiles, Mark <MARK.CHILES@mdu.com>; Parvinen, Michael <Michael.Parvinen@cngc.com>; Archer, Pamela <Pamela.Archer@cngc.com>; Pfordte, Byron <Byron.Pfordte@mdu.com>; Tillis, Daniel <Daniel.Tillis@mdu.com>

Subject: 11/09/22 WEAF Small Group Mtg Notes

Present:

Mark Chiles
Lori Blattner
Dan Tillis
Chris Mickelson
Pam Archer
Charlee Thompson
Hanna Navarro
Lorena Shah
Andrew Sellards
Byron Pfordte
Yochi Zakai
Corey Dahl
Shannon Steed

Offered for discussion:

1. Discuss interim EDP
2. Ideas for potential WEAF enhancements or funding for this coming winter

Interim EDP Proposal slide deck presentation

Plan to file on 11/10/22 for January 1 start. The filing date was to allow CNG to begin to prepare the billing system for the program.

Discussion Topics:

- CNG's concern to meet the Commission's instruction and expectation that CNG would implement a program this winter help customers, and desire to provide customers with immediate help by reducing their monthly bills.
- EDP is an interim program that can be the foundation to create a perfected, long-term program. It doesn't require additional work by the CAAs because we would use the EA benefit information they currently provide. It also wouldn't interfere with a one-time arrearage forgiveness program which is a possibility, but the EDP program would benefit many more customers, have greater impact on reducing monthly bills, and for two years.
- External attendees expressed surprise and disagreement with filing on 11/10/22 as they have not had time to discuss the proposal with their internal teams, each other, and provide feedback to the company for necessary changes. CNG was reminded this is required by law to be a collaborative process with the advisory group. The group expressed they were not being involved and the concerns they previously brought up were not being heard or considered. There is no consensus on a program design and the members are being cut out. CNG expressed the intention is not to cut them out

- External attendees expressed surprise and disagreement with filing on 11/10/22 as they have not had time to discuss the proposal with their internal teams, each other, and provide feedback to the company for necessary changes. CNG was reminded this is required by law to be a collaborative process with the advisory group. The group expressed they were not being involved and the concerns they previously brought up were not being heard or considered. There is no consensus on a program design and the members are being cut out. CNG expressed the intention is not to cut them out and not to impose new burdens on the CAAs. This program is an interim step until the CAAs are comfortable implementing the program for their use.
- CNG noted the concerns brought by the group since the program was first introduced have been addressed in later versions of the proposal, including most recently.
- CNG requested specific objections to help address them to continue progress. Issues include:
 - Having time to develop a program design that considers how to maximize the use of LIHEAP. The LIHEAP calculation must be done before discounts are applied to maximize the use of federal dollars.
 - Communication strategy for addressing media concerns about fraud in self-attestation programs.
 - Scripting to be developed for CXT agent to use when speaking with customers about wrap-around programs available at CAAs, and getting recipients to CAAs to apply for them.
- Suggested design additions by members:
 - Increasing the maximum WEAF pledge amount
 - Using Experian data to help identify low-income customers
 - Identifying customers who have previously received EA
 - Identifying customers with past due balances
- Customer communications can be created and improved while the interim EDP program is in place and are not required to be sent to customers until the rate increase.
- Next steps:
 - Members will provide a response to the proposal within one week.
 - CNG will target November 18 as the filing date instead of 11/10/22.

Thank you,
Shannon Steed, Consumer Specialist
Cascade Natural Gas - Kennewick General Office
509-378-9546

0:0:0.0 --> 0:0:24.670

Steed, Shannon

Hi everyone again, my name is Shannon Steed and I'm the consumer specialist with Cascade natural gas. Thanks very much for joining us today. This meeting is being recorded and we will also be taking minutes. So this information will also be provided for you later. So what we'll do is we will go ahead and begin with our roll call and then we have a full agenda. So we'll go ahead and get started. Let me share my screen here with you.

0:0:33.700 --> 0:0:38.900

Steed, Shannon

OK. We'll start our roll call with our Community Action agency partners, Blue Mountain Action Council.

0:0:44.910 --> 0:0:46.380

Steed, Shannon

Meaning the action connections.

0:0:48.60 --> 0:0:50.240

3ee92f91-613f-4f72-ae9b-73c84fc64cbd

Hi Shannon, this is me. Dalia. I'm here.

0:0:52.380 --> 0:0:55.340

Steed, Shannon

Community Action of Lewis, Mason and Thurston counties.

0:1:0.220 --> 0:1:1.950

Steed, Shannon

Coastal Community Action program.

0:1:7.620 --> 0:1:9.850

Steed, Shannon

Chelan Douglas Community Action Council.

0:1:15.130 --> 0:1:16.610

Steed, Shannon

Kitsap Community resources.

0:1:17.670 --> 0:1:19.0

f28187b1-2413-40b4-8ec0-aeae9463e854

Hi, Shannon, this is candy.

0:1:19.850 --> 0:1:20.470

Steed, Shannon
I candy.

0:1:21.990 --> 0:1:24.140

Steed, Shannon
Lower Columbia Community Action Center.

0:1:28.550 --> 0:1:30.440

Steed, Shannon
Northwest Community Action Center.

0:1:31.900 --> 0:1:33.220

Jose Alvarez (NCAC)
Hi, Shannon, this is Jose.

0:1:33.790 --> 0:1:34.740

Steed, Shannon
I said I'm Jose.

0:1:35.800 --> 0:1:36.910

Steed, Shannon
Oh, I see of Washington.

0:1:42.180 --> 0:1:43.210

Steed, Shannon
Opportunity council.

0:1:44.350 --> 0:1:45.930

Lorena Shah
Lorena and Marie are here.

0:1:46.750 --> 0:1:47.930

Steed, Shannon
Hello, thank you both.

0:1:48.970 --> 0:1:50.740

Steed, Shannon
Meeting the action of Skagit County.

0:1:56.150 --> 0:1:58.260

Steed, Shannon
Snohomish County Human Services department.

0:1:59.600 --> 0:2:0.840

Hockett, Constance
Constance hockett.

0:2:2.490 --> 0:2:3.130

Steed, Shannon
I, Constance.

0:2:2.930 --> 0:2:3.400

Hockett, Constance
Hello.

0:2:6.150 --> 0:2:7.110

Steed, Shannon
UTC staff.

0:2:11.590 --> 0:2:13.180

Navarro, Hanna (UTC)
Hi, this is Hanna Navarro.

0:2:14.700 --> 0:2:16.100

Roberts, Andrew (UTC)
This is Andrew Roberts with staff.

0:2:16.580 --> 0:2:18.390

Sellards, Andrew (UTC)
And this is Andy Sellards with staff.

0:2:19.230 --> 0:2:20.120

Steed, Shannon
I think you all.

0:2:20.990 --> 0:2:21.940

Steed, Shannon
The energy project.

0:2:23.460 --> 0:2:24.600

Ross Quigley
Yeah, this is Ross Quigley.

0:2:27.550 --> 0:2:29.300

Yochi Zakai
Hey guys. These guys here as well.

0:2:30.430 --> 0:2:31.330

Steed, Shannon
I think you.

0:2:30.350 --> 0:2:31.380

Yochi Zakai
Good afternoon, everyone.

0:2:32.90 --> 0:2:32.550

Steed, Shannon
Aye.

0:2:33.290 --> 0:2:34.240

Steed, Shannon
Our public counsel.

0:2:36.810 --> 0:2:37.950

Corey Dahl (PCU-he/him) (Guest)
Yes, this is Corey Dahl.

0:2:38.870 --> 0:2:39.460

Steed, Shannon
Hickory.

0:2:40.190 --> 0:2:41.580

Steed, Shannon
Northwest Energy coalition.

0:2:42.770 --> 0:2:50.900

Charlee Thompson
Hi, this is Charlie Thompson and if possible could my name be corrected in the spelling? It's EE and not IE.

0:2:51.720 --> 0:2:54.370

Steed, Shannon
Of course, I apologize. I will. I will get that corrected.

0:2:54.870 --> 0:2:55.940

Charlee Thompson
No problem. Thank you.

0:2:57.230 --> 0:2:58.230

Steed, Shannon
Department of Commerce.

0:3:4.510 --> 0:3:5.350

Steed, Shannon
And for cascade.

0:3:4.380 --> 0:3:5.700

DeBell, Michelle (COM)
Michelle de Belle is here.

0:3:6.350 --> 0:3:7.640

Steed, Shannon
Oh, hi. Thank you, Michelle.

0:3:8.770 --> 0:3:10.940

Steed, Shannon

And for Cascade natural gas Pam Archer.

0:3:12.260 --> 0:3:13.400

Archer, Pamela

Hi Shannon, it's Pam.

0:3:14.140 --> 0:3:15.240

Steed, Shannon

Hi, Chris Mickelson.

0:3:17.500 --> 0:3:20.520

Mickelson, Christopher

Hello regulatory affairs manager for Cascade.

0:3:21.930 --> 0:3:22.740

Steed, Shannon

Byron Forte.

0:3:24.510 --> 0:3:24.890

Pfordte, Byron

Hello.

0:3:26.730 --> 0:3:27.530

Steed, Shannon

Dan tillis.

0:3:29.910 --> 0:3:30.720

Tillis, Daniel

Hi Shannon, I'm here.

0:3:31.560 --> 0:3:33.200

Steed, Shannon

Hi and Mark Chiles.

0:3:35.210 --> 0:3:38.720

Chiles, Mark

And good afternoon everyone. I'm here also thanks.

0:3:39.480 --> 0:3:40.520

Steed, Shannon

Hi, thank you, Mark.

0:3:42.150 --> 0:3:49.880

Steed, Shannon

So we have, like I said, we have a full agenda. So I will go ahead and turn over the floor to Dan Tillis with item 2. Dan.

0:3:51.350 --> 0:3:57.700

Tillis, Daniel

Hey, thanks, Shannon. And if in case everyone hasn't seen it yet, I did post a revised agenda in the chat.

0:3:59.80 --> 0:4:2.260

Tillis, Daniel

Yoki you? We received your e-mail that you sent a little over an hour ago.

0:4:2.340 --> 0:4:22.20

Tillis, Daniel

So and you know, we haven't had a chance to read through everything yet and certainly haven't had a chance to discuss it internally yet. So I think putting our current position on whether or not we're gonna move forward with the filing ahead of going through your your items two and three is.

0:4:22.760 --> 0:4:36.610

Tillis, Daniel

Our out of order, and so we'd prefer that you guys go through the attached documents you sent with your e-mail and then we can provide feedback on where we stand right now with our filing after you go through that.

0:4:41.350 --> 0:4:42.680

Yochi Zakai

Sounds reasonable to me.

0:4:41.690 --> 0:4:43.650

Tillis, Daniel

Is that is that work OK?

0:4:45.450 --> 0:4:45.920

Tillis, Daniel

Daughter.

0:4:44.960 --> 0:4:51.740

Yochi Zakai

That work for the others that uh had proposed the agenda staff, public counsel and why?

0:4:52.870 --> 0:4:53.860

Charlee Thompson

Yep, that works.

0:4:55.10 --> 0:5:0.670

Corey Dahl (PCU-he/him) (Guest)

Yeah, that that works for me. It's just important that we we get clarification on that before the end of the meeting.

0:5:1.820 --> 0:5:3.840

Tillis, Daniel

Yep, we can definitely do that so.

0:5:4.780 --> 0:5:11.990

Tillis, Daniel

So at you, OK, I don't know if you wanna leave the through those documents or who's gonna do that, but I'll turn it over to whoever is gonna take us through those.

0:5:13.40 --> 0:5:20.890

Yochi Zakai

Yeah. Thanks for being flexible and adjusting the agenda. I really appreciate it.

0:5:22.510 --> 0:5:43.560

Yochi Zakai

And for those who didn't get a chance to read the e-mail, staff and the Northwest Energy Coalition and Public Council and the Energy project kind of met this morning and put together an alternative proposal for kind of a way forward with providing assistance to customers this.

0:5:44.830 --> 0:6:12.970

Yochi Zakai

A heating season, as well as looking forward to ways to get bill discount rate implemented for Cascade and so we distributed that and then asked for the opportunity to be able to present that today. So again appreciate the flexibility and adjusting the agenda and certainly don't expect you to have been able to read everything that was sent over and that's why we wanted to take that.

0:6:13.640 --> 0:6:30.720

Yochi Zakai

Time to present and kind of walk through it today and then of course being that we can have multiple meetings to follow up and and ask questions on it in the future. And why don't I share my screen just so that if folks haven't pulled it up yet, they can see it.

0:6:30.800 --> 0:6:33.70

Yochi Zakai

Yeah. So.

0:6:33.150 --> 0:6:52.280

Yochi Zakai

Uh, hopefully that's come up. So this is a proposal again that was put together by the energy project in Northwest Energy coalition and public counsel and we worked with staff and we'll let them speak for themselves, but they, they, they've seen drafts of this.

0:6:53.480 --> 0:7:24.110

Yochi Zakai

And so our ask here is that cascade not, you know, file for approval of the new bell discount rate until you've had the opportunity to review the written concerns raised by the advisory group and listening to presentations from the advisory group discussing, you know, our concerns, we'd like the meetings that are going over this work to be longer than one hour.

0:7:24.590 --> 0:7:46.900

Yochi Zakai

We're suggesting at least 90 consecutive minutes, but it could be longer. Seems like it's just been a really

compressed time frame to try to address these issues and we want to make sure that if we get into something, we'll have time to really engage in good faith and collaboration and compromise to really try to reach our goal of helping more customers.

0:7:47.620 --> 0:7:58.30

Yochi Zakai

Umm, we also think that it would be helpful to have a third party set the agenda and facilitate these meetings.

0:7:59.170 --> 0:8:30.920

Yochi Zakai

And that's because the facilitation today, you know, we didn't feel really had provided an opportunity to explain our concerns or present alternative proposals. I feel like at the end of our last small group meeting, which I know didn't include everyone here, you know, I had kind of listed the things that we were thinking about in terms of an alternative proposal to a bill discount rate, which we have the chance to write out more thoroughly here and are having the chance to present now. But.

0:8:31.380 --> 0:8:36.790

Yochi Zakai

The only way we were able to really get the floor to make this presentation was to.

0:8:38.280 --> 0:9:5.690

Yochi Zakai

In a non collaborative way asked to rewrite the agenda for this meeting. And that's not the collaborative approach that we wanna take. So it really think that there's a way that we could have that be, you know, a little bit more of a collaborative process and think the third party facilitator would to set the agenda and to help us with facilitation would really help that.

0:9:6.270 --> 0:9:6.830

Yochi Zakai

Umm.

0:9:8.110 --> 0:9:38.460

Yochi Zakai

The the next concern is something that Lorena has brought up in the past and that is, you know, we think that the when we're talking about the bill discount rate, it would be helpful to focus on one element of the program at a time instead of trying to cover the whole program in one meeting. And that will allow us to really get in depth and to talk about the the different elements and how it's gonna work for the agencies.

0:9:38.540 --> 0:9:48.300

Yochi Zakai

How it's gonna work for customers, how it's going to work for the company and try to find something that will work best for everyone and primarily to serve customers.

0:9:48.970 --> 0:9:49.470

Yochi Zakai

Umm.

0:9:50.930 --> 0:9:58.570

Yochi Zakai

And then the opportunity to, you know, provide notes and respond in writing if they're unresolved questions.

0:9:59.780 --> 0:10:0.850

Yochi Zakai

During the meeting.

0:10:1.550 --> 0:10:2.40

Yochi Zakai

Umm.

0:10:3.600 --> 0:10:8.230

Yochi Zakai

Corey, do you wanna discuss that last point? That was something you had brought up.

0:10:11.270 --> 0:10:12.630

Yochi Zakai

If I can put you on the spot.

0:10:13.270 --> 0:10:14.440

Corey Dahl (PCU-he/him) (Guest)

Yeah, of course.

0:10:14.680 --> 0:10:20.230

Corey Dahl (PCU-he/him) (Guest)

I'm sorry, just trying to make sure that I was unmuted so one of the.

0:10:22.580 --> 0:10:30.970

Corey Dahl (PCU-he/him) (Guest)

One of the ongoing and existing concerns with the bill discount rate that public council identified.

0:10:32.180 --> 0:10:33.130

Corey Dahl (PCU-he/him) (Guest)

Was that?

0:10:35.0 --> 0:10:41.850

Corey Dahl (PCU-he/him) (Guest)

There wasn't a clear path forward on reaching out to new customers since if the interim bill discount.

0:10:42.890 --> 0:11:9.900

Corey Dahl (PCU-he/him) (Guest)

Program had been implemented or would be implemented in the near future. It would really only reach the universe of customers that are existing in programs and I'm not expand the universe of customers that are enrolled and also wouldn't reach new customers. That would likely be facing unaffordable bills as the result of significant increases to gas rates during the heat. The winter heating season.

0:11:10.940 --> 0:11:12.630

Corey Dahl (PCU-he/him) (Guest)

So as a result.

0:11:14.110 --> 0:11:33.770

Corey Dahl (PCU-he/him) (Guest)

I found it important to make sure that there was a collaborative agreement on inclusive outreach and to make sure that steps were taken to get more folks enrolled into the new program rather than just relying on the existing universe of customers.

0:11:41.850 --> 0:11:52.780

Yochi Zakai

Thanks and I don't know if you have anything else to say about that or charlee if I could put you on a spot on the spot to talk a little bit. I know you participated in a vistas.

0:11:54.340 --> 0:12:3.570

Yochi Zakai

Ongoing meetings about their bill discount program design and maybe a little bit about what's worked well with that they that you we were trying to incorporate here.

0:12:4.380 --> 0:12:6.110

Charlee Thompson

Sure. Yeah. Yeah, that's great.

0:12:7.570 --> 0:12:20.100

Charlee Thompson

So like as you he said I I have been involved in this does low income advisory committee and then their subcommittee specific to build discount right. And the process that has worked really well for all the stakeholders and I'm sure a lot of us are overlapping here.

0:12:21.610 --> 0:12:26.140

Charlee Thompson

That which point was it one of these points addresses is that?

0:12:27.340 --> 0:12:36.540

Charlee Thompson

For every meeting and it's about biweekly or so. Each of these meetings, we're having a different discussion on an element of the build build discount program. So one might be on.

0:12:37.510 --> 0:12:48.120

Charlee Thompson

Joint administration between utility and the CAP agencies. And then maybe after we have either that meeting or it takes 2 to kind of figure everything out between between folks, then we'll move on to.

0:12:49.560 --> 0:13:3.400

Charlee Thompson

Uh, self attestation in in income verification and maybe that takes a little bit. But then after each

meeting gets resolved they Vista staff has been very good about sending out notes on what was resolved, what needs to continue into the next meeting.

0:13:3.520 --> 0:13:25.610

Charlee Thompson

Umm. And I think having that planning process or maybe I don't know, maybe on the outside or on paper it kind of seems like it would be slow, it's been moving forward at a pretty consistent pace, which has been it's been a good process. So that was a point here that I I raised in our discussion earlier and I think would work well if it was me or here as well.

0:13:26.500 --> 0:13:29.470

Tillis, Daniel

A yochi before we move on. Thanks, Charlie for that.

0:13:30.650 --> 0:13:49.300

Tillis, Daniel

I I don't wanna try to respond to every item here because I don't think we'll have time to do that today. But I do for item 1 E because I think it stems from a misunderstanding of our proposal. I do want to clarify what our proposal includes. It definitely does not just.

0:13:50.480 --> 0:14:22.110

Tillis, Daniel

Or not just for the universe of customers who have participated in in Bill pay, energy assistance in the past. It is for all customers who may need any assistance at all. We would be opting in any customers who have received energy assistance of any type over the past year. But all customers who need any help can apply through an agency. Well, in this case with our temporary proposal can seek approval through the Company for energy discount program.

0:14:22.190 --> 0:14:26.370

Tillis, Daniel

And just as we have an organ, we would have a comprehensive outreach program.

0:14:27.450 --> 0:14:38.840

Tillis, Daniel

That is conducted by the company and in partnership with anybody else who wants to join us in that. So just to clarify there, it does not exclude any customers at all, any any customer could apply for assistance.

0:14:40.120 --> 0:15:2.360

Corey Dahl (PCU-he/him) (Guest)

Yeah, that, that, that's good to level set on that. That was my understanding. So, so we like, I'm glad that we're on the same page on that. But just the concern that knowing that the motivation for the Commissioners request on this was that bills would be increasing significantly due to no steps for mitigation.

0:15:4.280 --> 0:15:5.580

Corey Dahl (PCU-he/him) (Guest)

So it's.

0:15:6.100 --> 0:15:19.630

Corey Dahl (PCU-he/him) (Guest)

Uh incumbent that there is additional, concerted, inclusive outreach to make sure that all eligible customers are as many eligible customers as possible are being brought in the door.

0:15:22.510 --> 0:15:31.820

Corey Dahl (PCU-he/him) (Guest)

And and I and wasn't suggesting that it was only customers currently enrolled that would be eligible. It was just the the customers that would immediately receive that, that.

0:15:33.680 --> 0:15:34.130

Tillis, Daniel

Gotcha.

0:15:33.180 --> 0:15:34.370

Corey Dahl (PCU-he/him) (Guest)

The benefits of the program.

0:15:34.960 --> 0:15:36.40

Tillis, Daniel

OK. Thanks.

0:15:41.590 --> 0:15:49.20

Yochi Zakai

Alright, so I think I'm going to move on to two now and to just this is what I kind of mentioned briefly at the last.

0:15:49.100 --> 0:16:19.590

Yochi Zakai

Uh, a small group meeting that that we had and I've tried to have the opportunity to get into this a little bit more about, you know, a proposal that we think is workable immediately to provide additional assistance to customers. And so the first prong of this would be automatic arrearage forgiveness. And we're open to doing this in many different ways we've seen.

0:16:19.970 --> 0:16:50.160

Yochi Zakai

The first example A is something that Avista did at the end of its last program year with less than statutory notice, the Commission approved a program to provide automatic arrearage forgiveness to all residential customers with a rear ages that were 60 days past due and larger than \$100. And I think the grants were up to 350, it says. Again, the particular details of what the threshold should be.

0:16:50.240 --> 0:17:20.400

Yochi Zakai

Obviously you know should be worked out in a way that makes sense with the budget that you know we're trying to spend and the need that you know that customers have. But that's a really great example of something that could be done just kind of by crunching the data for what are we arrange is exists today, you know, for customers and you know, the Commission explicitly approved the use the existence of arrearages that were past that certain threshold as.

0:17:20.530 --> 0:17:31.60

Yochi Zakai

An estimate for customers that were qualified as as low income. And so I think that that's an option that we should consider.

0:17:32.240 --> 0:17:44.510

Yochi Zakai

The PSE and Northwest natural also identified low income customers by purchasing data from Experian and Epsilon who?

0:17:45.750 --> 0:17:51.530

Yochi Zakai

I don't want to try to categorize them. Uh, but those are companies that provide data about.

0:17:51.950 --> 0:18:21.560

Yochi Zakai

Uh in the household income or provide data about income that that could be purchased. And so they did that and then matched it with, you know, with customers and then automatically forgive diverges there. And the Commission has approved that before as well for both of those companies. And then of course we could just use customers who have already come in and ask for help and been income qualified. And we all of those are.

0:18:21.660 --> 0:18:30.180

Yochi Zakai

Something that we totally be open to and would love to see, you know, happen as as soon as possible in terms of providing help to customers.

0:18:31.900 --> 0:18:36.30

Yochi Zakai

The last one is looking at the.

0:18:36.110 --> 0:18:45.600

Yochi Zakai

A current we program and how we could make just you know, a couple of tweaks to it to to better serve customers.

0:18:45.680 --> 0:19:17.150

Yochi Zakai

So Umm the first is, you know, making it eligible up to 80% of area median income were 200% of federal poverty level as was ordered by the Commission in the last general rate case. We've had some discussion about that already. And then the other one is something that PSE is doing for its gas program right now for low income customers and that's.

0:19:17.630 --> 0:19:34.370

Yochi Zakai

You know, for the entire 2022 to 2023 program year, they're adjusting the benefit calculation based on the PGA increase that's going into effect. And so this includes you know in the future for customers that.

0:19:34.450 --> 0:19:36.700

Yochi Zakai

Uh, you know, have been.

0:19:36.770 --> 0:19:51.300

Yochi Zakai

Yeah, that that will be served and come in asking for help and and it includes looking back to customers who have already had their grant provided in this, you know, this season starting October 1st.

0:19:52.460 --> 0:20:21.530

Yochi Zakai

It's beamed. And I of course, would want, you know, your regulatory folks to make sure that you got percentages right. But I recall by looking at the PGA that that was a 23% and that the GRC increase was 2%. So it seems like if you're using last year's bills to calculate, you know, the amount that customers are eligible for that a 25% increase on that would be appropriate.

0:20:21.650 --> 0:20:51.570

Yochi Zakai

And then along with that, I think we can look at increasing the maximum benefit allowed by 25% as well. So those are some ideas about things that could be implemented right away less than statutory notice less than 30 days. And you know, at least the members of the entire group, you know that you know that are presenting this would be 100% and support of and alternate over to you know, Charlie.

0:20:51.820 --> 0:20:57.290

Yochi Zakai

Cory in favor say anything else or anyone else from the tap team if you'd like to.

0:20:57.950 --> 0:20:59.100

Yochi Zakai

Piping go ahead.

0:21:5.250 --> 0:21:17.690

Corey Dahl (PCU-he/him) (Guest)

No, I don't. I don't have anything specific to add other than I appreciate the company taking the time to to receive this proposal today and.

0:21:18.670 --> 0:21:43.180

Corey Dahl (PCU-he/him) (Guest)

You know, just reiterating public counsel's commitment to doing the work necessary to make sure that a we meet our shared goal of getting assistance immediately to customers based on the request of the Commissioners and then be making sure that we take the time necessary to work out a build discount rate.

0:21:43.520 --> 0:21:49.240

Corey Dahl (PCU-he/him) (Guest)

Umm, but in the interim or and in the long term for a permanent program that.

0:21:50.640 --> 0:22:0.740

Corey Dahl (PCU-he/him) (Guest)

Has the the cosigning of of the both the company and members of the advisory group HERE, and I think that this is a is a.

0:22:1.430 --> 0:22:5.680

Corey Dahl (PCU-he/him) (Guest)

Well laid out plan to give us a framework to do that.

0:22:11.380 --> 0:22:41.330

Yochi Zakai

And I guess I think one thing I meant to say about number one was that you know, I think they would be open to having you know in, in In interim program where we're we're we're not opposing an interim bill discount program this year. We just want to make sure we have time to talk about, talk about everything first before it gets implemented. So it's not a, there's no way this can happen before October 1st.

0:22:41.410 --> 0:22:48.880

Yochi Zakai

It it it totally. Could we just need to make sure that we feel like we've had a chance to really, you know, work through the details first.

0:22:53.560 --> 0:22:55.690

Yochi Zakai

Yeah, yeah, yeah.

0:22:51.700 --> 0:22:59.490

Charlee Thompson

That's what I was gonna say, Yogi. So thanks for bringing that up and and leading us through this and things cascade for giving us time to to go through this.

0:23:1.670 --> 0:23:24.320

Tillis, Daniel

And and I thanks for this. This specific feedback and before we get to the the feedback about the the discount program, the temporary proposed discount program itself, I'll just comment briefly on on items two and three without too much detail. I think we mentioned in the past that you know we're we're open to some sort of arrearage forgiveness.

0:23:25.820 --> 0:23:31.150

Tillis, Daniel

That is targeted to customers who are likely to be a need or have.

0:23:32.830 --> 0:23:38.550

Tillis, Daniel

Then verified as a need in the past, I will tell you we would have a very difficult time with.

0:23:39.690 --> 0:24:9.60

Tillis, Daniel

2A uh just because we feel like that's too much of a shotgun approach and not not precise enough to really help the customers who who would likely be in need or have exhibited the need in the past. But we're definitely open to discussing those options we would need to figure out the funding part because we don't have leftover funds. As we've mentioned, we'd have to figure out where that falls under WEAF and whether or not we need to request additional funds, but definitely a good discussion item and then.

0:24:9.800 --> 0:24:40.10

Tillis, Daniel

It would mean that you just talk about timing on that one too, and you know it is now the right time before people have really started experiencing the higher rates or should we wait a few months and you know, forgive arrearages once they're a little higher and see what happens there. But we can talk about that for #3. I think those are really good ideas. We need to talk about it internally and make sure we get a consensus. But I think they came up briefly in our last meeting, Lorena brought brought one of the ideas forward and it makes sense to me.

0:24:40.110 --> 0:24:44.980

Tillis, Daniel

If, as rates have gone up, you know we we we can account for that.

0:24:46.310 --> 0:24:52.240

Tillis, Daniel

We need to get work through the details, but I think those are really good ideas as my initial response to that to #3.

0:25:0.930 --> 0:25:1.530

Yochi Zakai

Thanks.

0:25:0.560 --> 0:25:10.950

Tillis, Daniel

So you wanna does anybody else have any other comments on the term sheet or if not, we'll have maybe have you if you walk us through the feedback on the discount program discount rate program?

0:25:15.200 --> 0:25:17.130

Yochi Zakai

Hanna, can I put you on the spot?

0:25:22.410 --> 0:25:23.160

Navarro, Hanna (UTC)

Umm.

0:25:23.840 --> 0:25:31.310

Navarro, Hanna (UTC)

Yeah, I I've had a chance to briefly review what you presented today and.

0:25:32.490 --> 0:25:35.40

Navarro, Hanna (UTC)

Generally supportive.

0:25:35.180 --> 0:25:45.530

Navarro, Hanna (UTC)

Umm, I think that the options the two options for interim assistance are both good ideas that we should explore.

0:25:49.110 --> 0:25:49.470

Yochi Zakai

Thanks.

0:25:51.960 --> 0:25:52.440

Yochi Zakai

Umm.

0:25:53.770 --> 0:25:58.630

Yochi Zakai

Alright, come on. That took less time than I thought it would, so that's good.

0:26:1.0 --> 0:26:28.960

Yochi Zakai

But Cory, I I guess, can I put you on the spot? I you know I provided written feedback, I totally acknowledge that the company hasn't had the time to go through that. You know that long document that TEP put together. But I feel like if I start talking, I'm not gonna be able to provide my feedback in a succinct manner that will be helpful.

0:26:29.150 --> 0:26:52.160

Yochi Zakai

Umm. And so I guess I'm wondering if I can lean on my, you know, my my partners here in, in this proposal to maybe give give some of their feedback and maybe let and and and I can I can try maybe if you have specific things they could like made a chat about it would would that be OK? Sorry, we're kind of flying by the seat of our pants here.

0:27:0.780 --> 0:27:9.280

Corey Dahl (PCU-he/him) (Guest)

Sorry, I just tried to go to zoom to unmute this. Our our system does not deal well with teams, so it's it's always an adventure.

0:27:12.80 --> 0:27:16.380

Corey Dahl (PCU-he/him) (Guest)

Yeah, I'm. I'm happy to walk through some of the.

0:27:17.110 --> 0:27:20.810

Corey Dahl (PCU-he/him) (Guest)

Umm, feedback we had. I'm just trying to pull up the document.

0:27:52.430 --> 0:28:4.290

Corey Dahl (PCU-he/him) (Guest)

OK, I am not going to be able to pull it up because it's saved on our network drive and in order to connect to teams I have to disconnect our VPN because our VPN blocks teams for some reason.

0:28:5.750 --> 0:28:6.710

Corey Dahl (PCU-he/him) (Guest)

So.

0:28:6.590 --> 0:28:9.960

Tillis, Daniel

Hey I I can share it if you want or yochi can share it.

0:28:10.520 --> 0:28:12.640

Corey Dahl (PCU-he/him) (Guest)

Yeah, that be great. That'd be great. OK.

0:28:13.950 --> 0:28:15.520

Tillis, Daniel

You want to share or would you like me to?

0:28:17.130 --> 0:28:32.730

Yochi Zakai

Sure. Yeah. I mean this, you know, this document I again this comes from tap. And so I don't want to you know, other folks didn't vet everything that's in here. And so I don't wanna.

0:28:34.40 --> 0:28:39.510

Yochi Zakai

Presented as something that comes from everyone, but I'm happy to share it so people can start to see our concerns.

0:28:46.340 --> 0:28:47.670

Yochi Zakai

Make it a little bigger too.

0:28:48.470 --> 0:28:57.420

Corey Dahl (PCU-he/him) (Guest)

And I was able to pull up a version of my comments from e-mail, so we're good to go, so I can follow along.

0:28:58.280 --> 0:28:58.610

Yochi Zakai

Yeah.

0:29:4.960 --> 0:29:35.790

Yochi Zakai

OK. So I guess I'll just start talking about it and I'll try not to be too rambly and try to be fairly succinct. As you can see it's, you know, 7 pages. So there's a lot of, yeah, here the the first thing is designing the build discount rate to maximize the use of federal funds and to minimize the impact on all rate payers. So that's looking at the overlap with LIHEAP and some suggestions to look at what Avista has proposed.

0:29:35.970 --> 0:30:5.840

Yochi Zakai

I'm doing there and the other element of maximizing the use of federal funds is Community Action

agencies getting federal community service block grants or CSBG and the information that the agencies need to collect in order to do reporting on on that piece of federal funding that that they get.

0:30:6.120 --> 0:30:11.860

Yochi Zakai

And my screen just went blank and I hope that I'm still there for you all one moment.

0:30:13.860 --> 0:30:14.910

Yochi Zakai

Can anyone still hear me?

0:30:16.340 --> 0:30:16.830

Tillis, Daniel

Yes.

0:30:16.40 --> 0:30:17.50

Corey Dahl (PCU-he/him) (Guest)

Yes. Yeah.

0:30:16.450 --> 0:30:17.440

Charlee Thompson

Yeah, we can hear you.

0:30:17.820 --> 0:30:19.250

Yochi Zakai

OK, cool. Sorry my.

0:30:18.170 --> 0:30:20.990

Corey Dahl (PCU-he/him) (Guest)

And the documents and the documents back too. Mm-hmm.

0:30:20.870 --> 0:30:21.840

Yochi Zakai

OK, great.

0:30:23.670 --> 0:30:42.890

Yochi Zakai

And so part of that is gonna involve looking at how information sharing is gonna work. You know, what information is going to be provided when, when Cascade enrolls customers in the program, what kind of information is going to be passed back to the CA as?

0:30:44.310 --> 0:31:14.460

Yochi Zakai

We're also gonna wanna use this information to monitor program efficacy, and we're also gonna wanna look at, you know, are we equitably serving customers. So we wanna make sure that we're going to collect sufficient demographic information so we can answer questions about, you know, is the is, is this program equitably serving customers. And then there's a bunch of data sort bunch of specific data.

0:31:14.580 --> 0:31:22.150

Yochi Zakai

Fields that we want to talk about, you know, collecting and providing for the purposes of federal reporting.

0:31:27.920 --> 0:31:28.260

Corey Dahl (PCU-he/him) (Guest)

And.

0:31:23.310 --> 0:31:28.520

Yochi Zakai

Uh, Next up is we have spoken about in depth we wanna serve.

0:31:29.370 --> 0:31:47.300

Corey Dahl (PCU-he/him) (Guest)

Go ahead. Yeah. I was just gonna. I was just gonna jump in here and and I'll add my feedback as it aligns with the items that you're talking about. That was an an issue that public counsel also identified was making sure that provisions are made to leverage those federal funds.

0:31:48.860 --> 0:31:52.60

Corey Dahl (PCU-he/him) (Guest)

I think as a benefit to the customers and as a benefit.

0:31:52.750 --> 0:31:53.280

Corey Dahl (PCU-he/him) (Guest)

Umm.

0:31:54.570 --> 0:32:25.730

Corey Dahl (PCU-he/him) (Guest)

At benefit to the qualifying customers and as a benefit to the to the company and customers that are paying into the budget for low income programs administered by the company that will allow those budgets to be stretched more effectively to serve customers. And another consideration that needs to be made here is that though some customers may be eligible for LIHEAP funding and provide the necessary documentation.

0:32:25.820 --> 0:32:43.300

Corey Dahl (PCU-he/him) (Guest)

To prove eligibility, there might be a number of customers who are excluded from LIHEAP eligibility due to immigration status, so we'll have to look at routes for customers that are income eligible but may not be LIHEAP eligible.

0:32:49.730 --> 0:33:10.20

Yochi Zakai

And again, I don't want to say that, you know, one of the things that I pointed out in the last document was you can't do it all in one meeting. And that was why I super hesitated to even agree to, like, walk through this document. But I'm. I'm gonna try. But like, just not gonna get to everything now. And I'm just gonna put that out there and not even try.

0:33:10.460 --> 0:33:11.50

Yochi Zakai
Ohm.

0:33:12.210 --> 0:33:13.150

Yochi Zakai
We've already talked.

0:33:12.230 --> 0:33:13.210

Corey Dahl (PCU-he/him) (Guest)
And and maybe this?

0:33:13.920 --> 0:33:14.990

Yochi Zakai
Yeah, go ahead, Cory.

0:33:14.80 --> 0:33:30.70

Corey Dahl (PCU-he/him) (Guest)
So I was gonna say that maybe this would be a good opportunity just to identify the issues that, that, that exist and we'll need to discuss in any further program discussions and and keep it at the 40,000 foot levels as as best as we can.

0:33:29.720 --> 0:33:30.230

Yochi Zakai
Yeah.

0:33:31.190 --> 0:33:32.630

Tillis, Daniel
Yeah, I think that makes sense.

0:33:31.390 --> 0:33:33.500

Yochi Zakai
Which I think I might be bad at doing.

0:33:34.730 --> 0:34:4.580

Tillis, Daniel
Yeah, I think that makes sense. And one item I intended to speak to on the last document and I see it coming up on this one. So reminded me real quick the the the threshold of the high high end threshold 200% or 80% FPL, just a reminder that Cascade voluntarily in concert with the advisory group moved to 200% FPL back on November 1st, 2019. So we've been there for three years, we don't have 80% AMI integrated yet, which is an agreement we made with the advisory group.

0:34:4.860 --> 0:34:29.710

Tillis, Daniel
Because of the complexity of the calculator and the timing, it was gonna take to shift, we tried to shift to a new type of calculator and that was rejected. And then the time it was gonna take to get to a new calculator we didn't have with 80% AMI and the traditional we've calculator integrated, we didn't have

time to get there by October 1st. So we started the program. You were just with 200% FPL. But we are at that Max 200% FPL as ordered by the Commission.

0:34:32.910 --> 0:34:47.170

Yochi Zakai

But again, the Commissioners order that we program now to serve 80% AMI and So what what we have back there is continuing with the current design of the calculator, but including 80% AMI.

0:34:49.620 --> 0:34:55.560

Yochi Zakai

The the next issue besides the income threshold is, you know making sure that.

0:34:57.140 --> 0:35:25.710

Yochi Zakai

Customers can access other Community Action agency services via our referral. What goes into the referral process? What kind of tracking of referrals and what kinds of targets for enrollment are we gonna have and how are we gonna have kind of a process for continuous improvement in the referrals and converting customers who are enrolled by the utility?

0:35:25.790 --> 0:35:32.30

Yochi Zakai

To get services. So that's I think really important and outreach plan.

0:35:33.710 --> 0:35:38.310

Yochi Zakai

This is what Cory addressed earlier. I incorporated his his suggestion.

0:35:40.530 --> 0:35:43.370

Yochi Zakai

Uh, how is enrollment gonna happen?

0:35:43.970 --> 0:35:44.600

Yochi Zakai

Umm.

0:35:46.70 --> 0:35:54.980

Yochi Zakai

So there's lots of different elements, so I'll just read the titles here so you know what goes into the self attestation.

0:35:57.50 --> 0:36:10.10

Yochi Zakai

How do you select which customers are audited? Why is the income that is being asked for? What is the income that is being audited? What are the details around those things?

0:36:10.510 --> 0:36:21.740

Yochi Zakai

Um, how long our customers enrolled for what happens when a customer's income change changes? How long do customers have to provide documentation?

0:36:22.330 --> 0:36:26.800

Yochi Zakai

Um, the responsibility for conducting audits?

0:36:28.360 --> 0:36:29.730

Yochi Zakai

Automatic enrollment.

0:36:30.900 --> 0:36:32.850

Yochi Zakai

A joint communication plan.

0:36:34.530 --> 0:36:43.920

Yochi Zakai

You know, there are many parts of this, but I just wanna raise like a couple that are of like, you know, big concern are communication about.

0:36:44.590 --> 0:36:55.620

Yochi Zakai

A benefit that was provided by self attestation that then is taken away when a customer does not provide documentation of benefits.

0:36:56.480 --> 0:37:27.190

Yochi Zakai

That's a. That's a tricky communication. It's an uncomfortable one, and it's one that we really wanna get the framing right on. And it's one that we wanna make sure that it doesn't appear that the company gives a benefit and the Community Action agency takes it away when the when the benefit is when the documentation isn't provided right. And so we want to make sure that we get that communication down well before you know the programs.

0:37:27.680 --> 0:37:29.360

Yochi Zakai

Tomorrow shall we start auditing?

0:37:29.900 --> 0:37:36.450

Yochi Zakai

Umm, the other part is startup and Umm, a plan for responding to inquiries about equity.

0:37:37.710 --> 0:37:47.960

Yochi Zakai

You know, a really concerned about a media inquiry about fraud, about a customer who's over income, who, you know, enrolled in the program.

0:37:49.40 --> 0:37:56.190

Yochi Zakai

And we wanna make sure that there's a media plan in place to respond to that such that.

0:37:57.810 --> 0:38:22.520

Yochi Zakai

You know, we're not jeopardizing the use of self attestations statewide from a really bad article that ends up in a paper and is, you know, cited by legislators and really tanks all the efforts that that we're trying to do statewide in terms of getting folks enrolled via self attestation.

0:38:25.120 --> 0:38:33.930

Yochi Zakai

Uh design of the income based tiers tower, the Community Action agencies gonna be funded for the work that they do on the bill discount rate.

0:38:34.810 --> 0:38:46.680

Yochi Zakai

Uh, how is a comparable arrearage management plan gonna be designed? And how should the annual reporting be modified as a result of implementation of the plan?

0:38:55.390 --> 0:38:57.720

Yochi Zakai

And again, don't expect you to have.

0:38:58.830 --> 0:39:3.850

Yochi Zakai

Answers to any of that or have read it and been able to respond to it, but thank you for the opportunity to present it.

0:39:5.70 --> 0:39:22.740

Corey Dahl (PCU-he/him) (Guest)

And I'll just add on that, I had a few questions about funding and recovery mechanisms, but that those are those are details that we we can talk about as that becomes a subject or when we have that allotted time for discussion of those those pieces.

0:39:26.520 --> 0:39:28.410

Tillis, Daniel

Thank you Yochi and Corey and Charlie.

0:39:28.830 --> 0:39:47.390

Tillis, Daniel

And I would open it up right now. And just before we move on, we talked about this a little bit, but then move on to the item number 3 to anybody else who has any input on related topics that have been shared or any other feedback on the, if you're familiar with the proposed EDP.

0:39:47.470 --> 0:39:47.900

Tillis, Daniel

The.

0:39:48.170 --> 0:39:52.270

Tillis, Daniel

Uh. Details or what was in the the potential filing?

0:39:53.630 --> 0:39:55.400

Tillis, Daniel

Before we continue.

0:40:0.50 --> 0:40:4.620

Navarro, Hanna (UTC)

Umm hi. This is Hannah Navarro with staff. I don't.

0:40:7.170 --> 0:40:13.960

Navarro, Hanna (UTC)

Umm I I just wanna give the feedback that I don't think there's been enough.

0:40:14.40 --> 0:40:15.850

Navarro, Hanna (UTC)

Umm. Time.

0:40:16.640 --> 0:40:25.210

Navarro, Hanna (UTC)

In this process, to determine some of the details when I was reviewing the filing, I had a lot of questions.

0:40:27.580 --> 0:40:29.40

Navarro, Hanna (UTC)

And uh.

0:40:30.50 --> 0:40:32.590

Navarro, Hanna (UTC)

Yeah, that's that's all the feedback all add.

0:40:37.150 --> 0:40:48.140

Tillis, Daniel

Yeah, you know, I I would say on that we we haven't gotten into a lot of those details yet because we have, we haven't gotten agreement on just the general.

0:40:49.730 --> 0:40:51.700

Tillis, Daniel

Per temporary program itself.

0:40:53.120 --> 0:41:2.610

Tillis, Daniel

We have an idea of how those details would work and and and that's what's taking place in Oregon right now, where we have a temporary energy discount program in place.

0:41:3.740 --> 0:41:16.170

Tillis, Daniel

The effective October 1st of this year, some of the things that have been brought forward in in the feedback are still items we're we're working to address an organ as we have that temporary program in place to help our customers there.

0:41:17.410 --> 0:41:33.160

Tillis, Daniel

So you know, we really haven't gotten that far yet and would have worked through that over the next couple of months before January 1st. So that you know, we could continue moving the ball forward here while while working through our game plan at the same time so.

0:41:35.300 --> 0:42:1.210

Tillis, Daniel

You know, I I I think the the feedback provided in the specific to the energy discount program there on that last document is are all items that are appreciate you bringing those forward and I think they're items we need to address and as I just said, I think there are some of those are items we could have addressed after agreeing on the general guidelines and then working through the details before January 1st.

0:42:2.410 --> 0:42:19.800

Tillis, Daniel

And you know, we we we're definitely committed to at some point having what we consider close to a perfect program in place. Our goal is to get as much help to customers immediately while working to get better at at the help that's provided so.

0:42:20.290 --> 0:42:29.740

Tillis, Daniel

Umm, you know, as you said, you OK, we haven't. We haven't had a chance to fully digest the feedback. Uh in in both documents just yet. We'll definitely do that.

0:42:30.820 --> 0:42:34.200

Tillis, Daniel

And we'll talk about next steps in a few minutes, but.

0:42:35.880 --> 0:42:38.90

Tillis, Daniel

Anybody else before we go to item 3?

0:42:44.100 --> 0:42:45.310

Tillis, Daniel

All right, well.

0:42:46.870 --> 0:43:9.330

Tillis, Daniel

You know it's it's with disappointment that I share that the cascade will not move forward with filing the temporary energy discount program. And that disappointment really stems from we we really firmly believe it's the the best way for mitigation during the winter season with the new rates through the PGA.

0:43:9.410 --> 0:43:9.740

Tillis, Daniel

Hey.

0:43:10.870 --> 0:43:40.440

Tillis, Daniel

You know, I think the other utilities brought mitigation to their with their PGA, but that's mitigation that pushes the problem down the road. The energy discount program actually gives customers monthly recurring discounts that help them with their bill rates every month instead of you know increasing rates again and again in the spring. So we think it's a better approach, but we we've heard the feedback, we appreciate the feedback and we're.

0:43:40.670 --> 0:43:57.300

Tillis, Daniel

I'm ready to move forward with with working, continuing to work with the advisory group to address the concerns you've brought forward and you know we we agree that still working to a date earlier than October 1st, 2023 is a good goal.

0:43:58.320 --> 0:44:5.110

Tillis, Daniel

You know, I I think it will take us some time based on the feedback we've received. If if we don't wanna move forward without addressing all those items so.

0:44:6.860 --> 0:44:11.580

Tillis, Daniel

We'll, we'll. We'll stop the we'll. We'll hold off on the filing and.

0:44:12.720 --> 0:44:34.130

Tillis, Daniel

You know, I I think next steps for me would be you know we need a little bit of time to to talk internally and digest the feedback. But then I think we have another meeting probably already scheduled for next week. I'm not sure if that will stay schedule or not because I think it's the Wednesday before the holiday weekend. So we'll see if we all want to do that or not. But whatever that next meeting is, we can maybe talk about.

0:44:35.930 --> 0:44:54.300

Tillis, Daniel

Next steps forward in responses to the term sheet and or we might respond to some of those via e-mail. Before then we'll we'll see. But so we just need to talk internally we Lori's traveling today, she's our director, director of regulatory marks on with this, but we just and Lori's team are on with this. But again, we just haven't talked at all yet, so.

0:44:58.390 --> 0:45:27.440

Yochi Zakai

Totally understandable that you had not had a chance to talk or digest things, and I promise you that if I could have gotten everything out earlier, I would have and was working as fast as we could to get everybody on board and the and the feedback we needed. And thank you for listening to our concerns and agreeing not to file and thank you for listening to us today. We appreciate it and we're optimistic that we can get something to.

0:45:27.910 --> 0:45:35.690

Yochi Zakai

In place to help customer soon, and we're willing to put in the time for, you know, whatever is necessary to.

0:45:36.410 --> 0:45:38.240

Yochi Zakai

To get it to get it done.

0:45:40.180 --> 0:45:42.480

Corey Dahl (PCU-he/him) (Guest)

No, all echo those sentiments.

0:45:42.560 --> 0:45:49.600

Corey Dahl (PCU-he/him) (Guest)

Umm, we do appreciate you receiving our feedback and taking this step because.

0:45:50.380 --> 0:45:56.600

Corey Dahl (PCU-he/him) (Guest)

I I'm confident that we can get forms of immediate relief to customers who need it and.

0:45:57.370 --> 0:46:2.190

Corey Dahl (PCU-he/him) (Guest)

Do it in a way that we know can be administered, administered through.

0:46:3.370 --> 0:46:6.430

Corey Dahl (PCU-he/him) (Guest)

Existing pathways and I'm also confident that we can.

0:46:8.90 --> 0:46:14.730

Corey Dahl (PCU-he/him) (Guest)

Work through a discount program that we feel good about, and we also feel good that it will be.

0:46:16.580 --> 0:46:24.690

Corey Dahl (PCU-he/him) (Guest)

Successful when it when it's launched and make sure all the pieces are in place to make sure that all of the the players involved in in.

0:46:25.780 --> 0:46:30.790

Corey Dahl (PCU-he/him) (Guest)

Implementing the program are are prepared to do that and and do that adequately.

0:46:34.790 --> 0:46:40.60

Tillis, Daniel

And since we have some time left, um, maybe a little bit of discussion on a few of the topics.

0:46:41.300 --> 0:46:44.620

Tillis, Daniel

Today. So we make make make full use of our our time together.

0:46:46.260 --> 0:47:14.170

Tillis, Daniel

Going back to the the options for providing arrearage forgiveness grants, as you know, as either we head into the winter season or we able farther into it since our last meeting, we have been working to better understand the approaches that Northwest natural and Puget Sound and other utilities. We haven't reached out to Avista. I think it's the first time I heard what they've done today. So unless I just forgot it, but to see to.

0:47:14.700 --> 0:47:20.630

Tillis, Daniel

Determine you know who they worked with at Epsilon and Experian. I already have the contact at Epsilon.

0:47:22.190 --> 0:47:41.910

Tillis, Daniel

Working on that experience contact, we're also in contact with forefront economics. Who did our low income needs assessment report. They've done some work for us in the past in the Yakima area where they actually did some propensity models for likely low income customers there.

0:47:43.230 --> 0:47:51.370

Tillis, Daniel

I don't think we ever did much with the data, quite frankly, but we wanna see if if their approach might help us.

0:47:52.30 --> 0:48:3.460

Tillis, Daniel

Uh have a higher level of accuracy with determining those likely low income customers. So we, we've done some work, some ground work very early, but some ground work on on that item.

0:48:5.280 --> 0:48:27.770

Tillis, Daniel

So update there and then for #3, I've already asked Shannon via via chat, Shannon C Via chat to start looking at what those changes would look like. I think for 3A the IT should be usage to add 25% to the past usage data not bill amount because we've works off the current we've calculator works off of bill amount.

0:48:28.990 --> 0:48:52.560

Tillis, Daniel

Or I've energy usage, not the amount, but she'll start looking at that as well as what 25% added to the Max benefit would look like. We typically don't get anywhere near our cap and and don't get to our soft cap for our budget. So we probably have some room there depending on what a reroute forgiveness API programming concert with that would look like and we can always ask for more money.

0:48:55.320 --> 0:48:57.970

Tillis, Daniel

And then there was one other item.

0:48:59.930 --> 0:49:2.400

Tillis, Daniel

Shoot, I'm forgetting it now. Talking too much.

0:49:5.50 --> 0:49:6.600

Tillis, Daniel

I might think about it in a minute, but.

0:49:8.580 --> 0:49:28.150

Tillis, Daniel

We we're already working on those couple of of areas a little bit just ohh I remember now and also Chad with Chris a little bit on integrating AMI you know it's there there are 16 counties and so it's a it's a challenge in the traditional we've calculator.

0:49:29.670 --> 0:49:51.240

Tillis, Daniel

You know, one option that Chris is presented as we could have 16 AMI calculators and each agency would only have to use the ones for their counties and then one FPL calculator. So the agencies would need to use the AMI calculator for their county or counties and then the FPL calculator and then choose the one that is best for the customer.

0:49:52.560 --> 0:50:8.930

Tillis, Daniel

And and so that's, you know, 11 possible approach we could move forward with, I don't know how long Chris would have to share with us how long he thinks that would take. But other than that we don't have any great answers for that right now. So we're open to feedback on other options.

0:50:11.90 --> 0:50:16.120

Tillis, Daniel

And if Chris wants to speak more about the 16 AMI calculator, she's welcome to.

0:50:25.910 --> 0:50:38.490

Yochi Zakai

And maybe if any of the agencies have thoughts on needing to use two calculators, is that something that is just not workable or is it something that, you know, maybe could?

0:50:39.360 --> 0:50:42.190

Yochi Zakai

Maybe could happen. It does sound like a little bit more work.

0:50:44.630 --> 0:50:49.210

Yochi Zakai

And maybe we just take that back and think about it a little more and be prepared to chat about it at the next meeting.

0:50:50.260 --> 0:50:50.890

Corey Dahl (PCU-he/him) (Guest)

And I would.

0:50:50.390 --> 0:50:57.50

DeBell, Michelle (COM)

This is Michelle from commerce and I would advise not to use two calculators. You're just gonna.

0:50:57.780 --> 0:51:1.350

DeBell, Michelle (COM)

Overly complicate things and create a lot of confusion.

0:51:2.500 --> 0:51:7.450

DeBell, Michelle (COM)

That's the decision of this group, but that is my recommendation. Don't try to use to.

0:51:11.620 --> 0:51:13.410

DeBell, Michelle (COM)

You'll wind up at cross purposes.

0:51:17.600 --> 0:51:34.400

Tillis, Daniel

But in Yochi think the suggestion of maybe the agencies and others give that some thought as far as multiple calculators or if we have. If you have other utilities with whom you're working, who have you know more than a couple of counties that you know they work in.

0:51:35.480 --> 0:51:44.50

Tillis, Daniel

You know, if there's an approach that they've created, it's working for you that we can steal. And I say we being Chris, he's smarter than me on that stuff.

0:51:45.350 --> 0:51:49.940

Tillis, Daniel

Then you know we we're we're happy to to still shamelessly so.

0:51:52.390 --> 0:51:53.900

Corey Dahl (PCU-he/him) (Guest)

Yeah, that's just what I was.

0:51:52.140 --> 0:51:59.870

Yochi Zakai

Yeah, I shared with you what we have from PSE. I think that's the probably the closest thing we have in the most overlap with your service territory.

0:52:0.590 --> 0:52:3.790

DeBell, Michelle (COM)

Right. And then the other thing is though it's it's.

0:52:4.700 --> 0:52:8.510

DeBell, Michelle (COM)

My point of view slightly more straightforward because.

0:52:9.490 --> 0:52:17.420

DeBell, Michelle (COM)

The calculation is what it is. It's your, it's your income that's gonna vary from county to county.

0:52:22.540 --> 0:52:23.670

Tillis, Daniel

Right, it's the.

0:52:22.840 --> 0:52:28.750

DeBell, Michelle (COM)

So you can set your. Yeah, you can set your income to be at 200% of the federal poverty level.

0:52:29.720 --> 0:52:34.600

DeBell, Michelle (COM)

And then whatever that is or 200% of the area median income.

0:52:35.910 --> 0:52:39.350

DeBell, Michelle (COM)

And then whatever that is you calculate against.

0:52:40.60 --> 0:52:41.220

DeBell, Michelle (COM)

Based on your account.

0:52:43.280 --> 0:53:13.510

Mickelson, Christopher

So this is Chris, maybe I don't quite understand how PSE is taking kind of that AMI FPL crossover chart that Yochi ultimately shared with us and gets applied to the benefit curve. So that's kind of the piece I struggle with at least with cascade is our benefit curve is built on either that FPL or AMI data and determining where.

0:53:13.650 --> 0:53:16.870

Mickelson, Christopher

Within that usage, how much they would get so.

0:53:18.380 --> 0:53:20.200

Mickelson, Christopher

And I don't I I didn't see that.

0:53:21.140 --> 0:53:28.260

Mickelson, Christopher

Connection based off that crossover chart so that that is kind of the piece I would need to see. I don't know if there's maybe another.

0:53:29.460 --> 0:53:35.190

Mickelson, Christopher

Maybe they have a calculator and this information feeds into that. I'm not sure, but that's the piece I'm missing.

0:53:38.580 --> 0:53:39.30

DeBell, Michelle (COM)

OK.

0:53:41.700 --> 0:53:45.330

Tillis, Daniel

And Chris, maybe if you have a contact at PSC, we could try to talk to them.

0:53:46.880 --> 0:53:47.510

Tillis, Daniel

You know, I think.

0:53:48.850 --> 0:53:53.930

Tillis, Daniel

We'll we'll work to get it done as soon as we can. If you all have any other ideas, let us know. Certainly will.

0:53:55.350 --> 0:53:59.840

Tillis, Daniel

May maybe since it's impacting this program year it's not EDP related.

0:54:0.360 --> 0:54:13.870

Tillis, Daniel

But, but since it is impacting this program, you're might be one of one of our first topics. We need to talk about on the top of the agenda for the next meeting, see where our progress is and any other ideas. If we haven't made much progress so.

0:54:17.120 --> 0:54:46.630

Sylvia Schaeffer

Daniel, this is Sylvia from Blue Mountain Action Council in Walla Walla. I would just say that the calculators, if he had two, is not gonna affect our agency in any way. You have tabs at the bottom of the one that we use now for WEAF calculations. So once said, 80 AMI and the other one said, you know, 200 or 150 or 200 FPL, we would just click on that tab and use whichever one we needed to use. I mean, it's not to us, it would not make.

0:54:46.710 --> 0:55:3.100

Sylvia Schaeffer

I any bit of difference whether we had two calculators or one, so I'm just saying I mean regardless, you know all this information that we just received is a lot and so you know that's as Community Action agencies doing the work it's it's.

0:55:5.100 --> 0:55:9.610

Sylvia Schaeffer

It's it's a lot. I mean, it's a lot of work. So with all these changes that are coming up all these.

0:55:9.690 --> 0:55:39.830

Sylvia Schaeffer

Some proposals and whatnot. Regardless, we'll do the work, but it's just, you know, it's we're working

with the customers, we're doing the work daily, everyday all day. So you know, I just wanted to put that out there that even though you're talking about like you're talking about WEA, whatever it is, it discount, you know, the benefit going either you use, we first use LIHEAP. I mean we've got tons of funds here while while county that we're very thankful for that we're able to help and access.

0:55:39.920 --> 0:56:10.650

Sylvia Schaeffer

Already, what you've what you're suggesting to access different funds. If you can't help with this, you know adding barriers as far as asking all these questions for clients to answer, some people don't want to answer those things that were brought out in this this presentation today. So you know it's those kind of things that people are afraid to come in here and ask for help. So I'll just put that out there. That's a lot of information. And you know this is I'm just speaking for myself. So as an just a director here for the.

0:56:10.760 --> 0:56:24.320

Sylvia Schaeffer

Energy assistance and the Rent assistance program that Blue Mountain Action Council. So it was a lot to take in, but I look forward to discussing anything that's presented to us. But it is kind of wanted to put that out there. So I appreciate cascade natural gases.

0:56:24.790 --> 0:56:32.500

Sylvia Schaeffer

Ohm always working so closely with us and you know anything we need always there for us. So I appreciate everybody there. So thank you.

0:56:35.690 --> 0:56:42.580

Tillis, Daniel

Great feedback, Sylvia. Thank you. And yeah, we it definitely is a lot. And so we have a lot to work on.

0:56:43.680 --> 0:57:6.390

Tillis, Daniel

And and we'll we'll continue doing that and you know we could maybe some Sylvia has provided feedback maybe Chris, one approach is to to build a A2 calculator model for for her agency and let them test it out for a couple weeks and see how it goes and if that's working well for them, expand that maybe one suggestion so.

0:57:12.340 --> 0:57:22.310

Tillis, Daniel

Alright, we're close to time here and I want to honor everybody's schedule. Anybody any other input on the topics we've discussed or any other topics?

0:57:29.840 --> 0:57:59.450

Tillis, Daniel

All right. Thank you, everyone. Like I said, we're supposed to have a small group meeting next week. We'll see if that holds with the holiday week. If not, we'll figure out the schedule after that. But you know, one of the things we've said, we are committed to is meeting more often and and so we'll, we'll we'll definitely get get that schedule set up so we can work out final WEA changes AMI and and possibly increasing the the caps and the past energy usage amount adder.

0:57:59.770 --> 0:58:1.460

Tillis, Daniel

Umm. And then.

0:58:2.660 --> 0:58:10.470

Tillis, Daniel

Really turn our focus to or keep our focus on a a great EDP program. So our energy discount of some sort so.

0:58:11.300 --> 0:58:21.750

Yochi Zakai

Yeah. Thanks to him. The other thing I wanted to mention is you. We've been making vague references to the small group that's been that's been meeting and.

0:58:22.930 --> 0:58:53.180

Yochi Zakai

We I think we should just name it that it's been Cascade Commission staff, Northwest Energy Coalition, Public Council and the energy project and the energy projects been working with Opportunity Council as we normally do as kind of the the Community Action Agency that we work closest with and if any of the other Community Action agencies are interested in participating, you know, I think that you know, we'd be open to that and you can feel free to, you know, reach out to me or Lorena or Ross.

0:58:53.280 --> 0:59:11.390

Yochi Zakai

And we can help out with that. And if any other advisory group members are interested in meeting more often and participating in some more detailed discussions, you know, I think we should, we should open that up too if if folks are interested because it kind of started ad hoc and we don't want to be exclusive in any way.

0:59:12.820 --> 0:59:42.390

Tillis, Daniel

Yeah, that that's great feedback yochi. I think it started with following up on the specific issues of 150% versus 200% cap. And then SMI versus AMI and the feedback we've received from Yogi and Cory. And then we brought a small group together and then decided I think there's another utility who has subcommittees that works on is working on the energy discount program for their utility. And so we decided to be a good idea to keep that going moving forward, but.

0:59:42.770 --> 0:59:49.190

Tillis, Daniel

The idea is definitely not to be exclusive, so if anybody feels like they'd like to be involved in another meeting to have those discussions, let us know so.

0:59:52.930 --> 0:59:55.420

Tillis, Daniel

Alright. Thanks everyone. Have a great rest of your day.

0:59:56.730 --> 0:59:58.220

Yochi Zakai

Thank you very much for your time.

0:59:57.0 --> 0:59:58.460

Navarro, Hanna (UTC)

Thanks. Thank you.

0:59:56.690 --> 0:59:59.460

Tillis, Daniel

Happy Thanksgiving. If we don't talk to you again. Alright, bye.

0:59:59.270 --> 0:59:59.820

Charlee Thompson

Thank you.

0:59:59.270 --> 1:0:0.340

DeBell, Michelle (COM)

Take care everybody.

From: Steed, Shannon

Sent: Wednesday, November 9, 2022 4:31 PM

To: Blattner, Lori <LORI.BLATTNER@intgas.com>; Mickelson, Christopher <Christopher.Mickelson@cngc.com>; Chiles, Mark <MARK.CHILES@mdu.com>; Parvinen, Michael <Michael.Parvinen@cngc.com>; Archer, Pamela <Pamela.Archer@cngc.com>; Pfordte, Byron <Byron.Pfordte@mdu.com>; Tillis, Daniel <Daniel.Tillis@mdu.com>

Subject: 11/09/22 WEAF Small Group Mtg Notes

Present:

Mark Chiles
Lori Blattner
Dan Tillis
Chris Mickelson
Pam Archer
Charlee Thompson
Hanna Navarro
Lorena Shah
Andrew Sellards
Byron Pfordte
Yochi Zakai
Corey Dahl
Shannon Steed

Offered for discussion:

1. Discuss interim EDP
2. Ideas for potential WEAF enhancements or funding for this coming winter

Interim EDP Proposal slide deck presentation

Plan to file on 11/10/22 for January 1 start. The filing date was to allow CNG to begin to prepare the billing system for the program.

Discussion Topics:

- CNG's concern to meet the Commission's instruction and expectation that CNG would implement a program this winter help customers, and desire to provide customers with immediate help by reducing their monthly bills.
- EDP is an interim program that can be the foundation to create a perfected, long-term program. It doesn't require additional work by the CAAs because we would use the EA benefit information they currently provide. It also wouldn't interfere with a one-time arrearage forgiveness program which is a possibility, but the EDP program would benefit many more customers, have greater impact on reducing monthly bills, and for two years.
- External attendees expressed surprise and disagreement with filing on 11/10/22 as they have not had time to discuss the proposal with their internal teams, each other, and provide feedback to the company for necessary changes. CNG was reminded this is required by law to be a collaborative process with the advisory group. The group expressed they were not being involved and the concerns they previously brought up were not being heard or considered. There is no consensus on a program design and the members are being cut out. CNG expressed the intention is not to cut them out

- External attendees expressed surprise and disagreement with filing on 11/10/22 as they have not had time to discuss the proposal with their internal teams, each other, and provide feedback to the company for necessary changes. CNG was reminded this is required by law to be a collaborative process with the advisory group. The group expressed they were not being involved and the concerns they previously brought up were not being heard or considered. There is no consensus on a program design and the members are being cut out. CNG expressed the intention is not to cut them out and not to impose new burdens on the CAAs. This program is an interim step until the CAAs are comfortable implementing the program for their use.
- CNG noted the concerns brought by the group since the program was first introduced have been addressed in later versions of the proposal, including most recently.
- CNG requested specific objections to help address them to continue progress. Issues include:
 - Having time to develop a program design that considers how to maximize the use of LIHEAP. The LIHEAP calculation must be done before discounts are applied to maximize the use of federal dollars.
 - Communication strategy for addressing media concerns about fraud in self-attestation programs.
 - Scripting to be developed for CXT agent to use when speaking with customers about wrap-around programs available at CAAs, and getting recipients to CAAs to apply for them.
- Suggested design additions by members:
 - Increasing the maximum WEAF pledge amount
 - Using Experian data to help identify low-income customers
 - Identifying customers who have previously received EA
 - Identifying customers with past due balances
- Customer communications can be created and improved while the interim EDP program is in place and are not required to be sent to customers until the rate increase.
- Next steps:
 - Members will provide a response to the proposal within one week.
 - CNG will target November 18 as the filing date instead of 11/10/22.

Thank you,
Shannon Steed, Consumer Specialist
Cascade Natural Gas - Kennewick General Office
509-378-9546

December 12, 2022

Ms. Amanda Maxwell
Executive Director and Secretary
Washington Utilities & Transportation Commission
621 Woodland Square Loop SE
Lacey, WA 98503

Regarding: UG-210755 Compliance Filing to Commission Request for Updates to Advisory Group Pursuant to Order 09

Dear Ms. Maxwell:

In compliance with Paragraph No. 78 of Order 09 in Docket No. UG-210755, Cascade Natural Gas Corporation encloses for filing the minutes and transcript from its December 2, 2022, WEAFF Small Group Advisory meeting. The following documents are submitted electronically as part of this filing:

- UG-210755-WEAF-Small-Group-Advisory-Meeting-Transcript-12-12-2022
- UG-210755-WEAF-Small-Group-Advisory-Meeting-Outcome-and -Minutes-12-12-2022

If you have any questions, please contact me at 208.377.6015 or Chris Mickelson at 509.734.4549.

Sincerely,

Lori Blattner

Lori Blattner
Director, Regulatory Affairs
Cascade Natural Gas Corporation
8113 W. Grandridge Blvd.
Kennewick, WA 99336
Lori.blattner@intgas.com

Attachments

WEAF Advisory Group

Agenda

December 2, 2022

KEY TOPIC: Reset tone of committee and reach agreement on the committee meeting process going forward.

GOAL FOR MEETING OUTCOME: Defined committee meeting processes and set topics for next meeting.

1. Define committee meeting processes:

a. Meeting scheduling

i. DECISIONS

- Should we continue to have subcommittee meetings, or should all meetings be the entire advisory group? Yes -keep small group
- Purpose of small group meetings?
 - a. Current year changes – full committee
 - b. Long term program – small group (with report back) (extend invite to everyone that's interested again) – TEP will commit to outreach to other agencies to get more participation
- What should the meeting schedule be?
 - a. Full committee Dec 21 – most agencies available
 - i. Full committee 3rd Wednesday 2:00 – 3:30
 - b. Small committee – 2nd and 4th weeks 2:00 – 3:30
- What should the meeting duration be?
- 90 minutes

b. Agendas

i. DECISIONS

- Process for agenda creation
 - a. Full Committee
 - i. Short company update
 - ii. Recap unresolved items from last meeting
 - iii. Update on new program design – focus on agency impacts
 - iv. Dedicated discussion of an agreed upon topic (i.e., CBP outreach)
 - b. Subcommittee – rate discount plus arrearage management design
 - i. Joint administration
 - ii. Self-attestation
 - iii. Income verification (audit)

- iv. LIHEAP interface
 - v. End with 1 or 2 decision points
 - vi. Set the next topic
- Timing of distribution for agenda and any pre-read materials
- a. Friday of week before for a Wed meeting
 - b. Provide feedback from group
- c. Meeting Format
- i. DECISIONS
 - What should the format of meetings look like (as an example see below)?
 - Start with question and then Discussion of proposal related to the meeting topic (the written topic will have been sent previously – set the topic at the previous meeting)
 - Feedback from each party
 - Agreement or specific plan for next steps to reach an agreement
 - What should meeting follow-up look like?
 - a. A couple slides that show how feedback from prior meeting helped set agenda (unresolved items)
 - How should decisions be documented?
 - a. Keep a list of key decisions, send out after each meeting the complete list/ here's what's coming up on same email
 - d. Discuss 3rd party facilitator – if existing staff can't handle the extra work, then hire a facilitator/ continue to check-in
2. Set topic for next meeting
- a. Company Topic Proposal – Decide on immediate changes to current WEAf program year
 - i. Small group – current year program changes/ put together topic list

Meeting Minutes

Lori – Lori indicated she thought it would be good to do a reset with the committee. Everyone has the same goal – make sure people are getting the help they need. So, we just need determine best way to make sure the meetings are productive, have a well-documented process on how the meetings will run, and how we make decisions and track items moving forward.

Lori then went into the below outline. Asked for any other ideas for agenda.

Yochi – A request was made prior to have a third-party facilitator. It might be good to discuss that.

Lori – Moved back to agenda

Charlee – Yes, makes sense to keep subcommittee, easier to coordinate, more efficient use of time – unless everyone on the WEAf groups wants to be on the subcommittee.

Lorena – She wanted to make sure she was understanding correctly, originally started small group to talk about interim EDP piece of the puzzle, while large committee continues working on permanent AMPED program. Is that still the landscape or is it this small sub-committee getting into details of the proposed AMPED?

Lori – I think that is the sort of question we're working through. If we decide to keep smaller group, what is their role.

Dan – Lorena's question is where I was going. Started smaller group meetings, then had a follow up meeting after the original one. It was a reintroduction of the full AMPED program with implementation date no later than 10/1/2023. Then we had a small group meeting about a week later because Yochi was unable to attend the larger meeting and shared some concerns via email. Cory also had some concerns later in the meeting specific to SMI vs AMI and 150% vs 200%. So, the follow up meeting was to address those and then I believe Charlee shared that other utilities have sub-committees/groups that meet more often on discount programs. And, were working towards the 10/1/23 date as well. So, discussing energy or rate discount program and then bring those to the larger group, I think was the plan.

Yochi – Would like to hear more from Lori. Think it makes sense to have a small group that meets more often. It should be open to everyone on the advisory committee and those that want to come. The small group would advise large group what was discussed. Don't have a good sense of – need to lean on Lorena more – which topics are the best topics small group should work on. I think it makes sense for smaller group to work on longer term changes to the program.

Lorena – Anything that is a change for the current season should probably be with the larger advisory group. Believes she is the only CAP Rep on this small group, at least today. Once focus is determined, may want to add more CAP Reps.

Hanna – Agree small group is valuable, then report back to large group.

Corey – Agree small group. For this current year changes, have larger group work on those. Extend invites to agencies -that have direct experience.

Lori – To sum it up – current year program changes would be discussed with full committee. Long term programs would be small group, with reporting back to large committee the plans, etc. Invite others that may want to be part of the small group.

Yochi – Sounds good. I'll commit to doing more outreach to agencies for their participation. Ideally would like to have more than 1 agency Rep at the meetings. Charlee – Do you recall how many agencies sent reps to the small Avista meetings?

Charlee – Good question. It's a small handful, more than 1 but less than 4 or 5. I can check.

Lori – That answers the first question – we will keep the small group to work on long term projects and report back to the large group. Explain the plan and re-extend invitation. Discussed meeting schedule.

Dan – Both small and large groups have meetings on 12/21. It just happened to work that way. We have a small group meeting next Wednesday, 12/7.

Lori – Is that too close to the holidays (12/21)?

Hanna/Yochi/Corey/Andrew – Would like to have a week earlier than the 21st.

Yochi – For duration, we feel like 90 minutes would give us time to dive into topics more.

Dan – What do we think of frequency for smaller groups and full advisory?

Lori – After further discussion with others, decided full committee meeting on 12/21, then every 3rd Wed -2:00-3:30 PT and small group, 2nd & 4th Wed 2-3:30 PT. Invites will be sent.

Lori – Started discussion on creating agenda items. She thought there were some standing agenda items.

Dan – He indicated there may be some minor ones, but there isn't many reoccurring. Maybe an update on how the year has gone.

Shannon – She did list a couple of items but obviously they would change during the year. Initial items for regular discussion were LIHEAP, AMPED, CBO pilot.

Dan – All great topics but based on request of focus on fewer topics, we may not be able to keep all of those.

Lori – If we're meeting with small committee, maybe have some standing updates.

Yochi – How does the communication happen in the other groups?

Charlee – Since joining at end of June, full committees – Avista has only met once or twice. Not recalling a lot of time dedicated for updates from sub-committee, but I think we should do that.

Lori – Is it a 5 min update?

Charlee – Not very consistent. Survey with CAP agencies, DR Community engagement etc.

Lori – So maybe 30 minutes of updates and the other hour for discussion on topic. Got agreement from everyone.

Hanna – LIHEAP update could be sent via email. AMPED design report at each advisory meeting. Not sure CBO outreach needs to be at every meeting. Do think 30 min update is good.

Yochi – He doesn't love the term AMPED, but terminology should not be a hang up.

Lori – Maybe break the new program into topics and prioritize them.

Yochi- Charlee – how have the topics been set at the other meetings you've participated in?

Charlee – I keep talking about Avista because their process works well. They have 4 overarching topics – joint administration between utility and agency, self-attestation, verification, and LIHEAP interface. Not 1 topic per meeting, subtopics. End with 1 or 2 decision points and then put on the next agenda. Can make an outline to share with this team.

Dan – Am I remembering correctly that those meetings are specific to creating the rate discount program targeted to start 10/1/2023?

Charlee – Yes.

Dan – So those sub-committee meetings are specific to a rate discount, not several topics.

Yochi – I would say they are designing their bill discount and arrearage management program at the same time.

Dan – Which was the plan for our small groups on AMPED or whatever it ends up being called.

Yochi- I encourage you to reach out to Avista, I'm sure they would be willing to chat about how they are doing things and perhaps share some of their materials.

Dan – I do feel like there are topics that might be good to resolve at small team level, or at least recommend to larger group before moving into rate discount. Such as current year WEAFF, arrearage forgiveness program, AMI component integration. To me, they are the higher priority.

Yochi – Didn't we decide that would be the larger group?

Dan – I think there are some things that we can talk through and make recommendations in smaller group and take to larger.

Yochi – I will defer to Lorena – do you think it's problematic if we start talking about items first in the small group?

Lorena – I go back and forth. It depends on the impact on the agencies. If it has an impact, I think it probably needs to stay with larger group and we just take time in next couple of advisory meetings to drill down on that. Maybe taking time to formulate that might be beneficial, but maybe not come to decisions.

Lori – Our next meeting will be full committee (Dec 21st). Maybe we start with the whole committee and that's our topic for the next small group meeting.

Yochi – We have a small group meeting on the 7th, so maybe we start there and then bring it to the bigger group. I want to be sensitive to Lorena's concern – we need to have sufficient time in the large group to thoroughly think it through. What would the impact be on the agencies? Thinking through it, maybe that may be a good way to think about it – how will the changes impact the CAA's rather than some of the design decisions that are company focused.

Lori – So for this update, it is more focused on impacts to agency. But we can reach out to Avista to get their topic list. Maybe we can work on that in our next meeting.

Yochi – The letter and feedback I provided had more than topics, but probably still possible to scale down into topics.

Lori – How about the distribution of agenda and pre-read materials? Would that need to be a couple of days or a week ahead?

Charlee – Maybe the Friday of the week before. Received agreement from everyone.

Yochi – One thing I've been thinking about is maybe it would be helpful to start with a discussion of the topic instead of proposal. Sometimes a proposal is the best thing that helps to get the discussion going, but I don't want it to feel like a pre-baked plan and so there is a balance there, not quite sure what the answer is to be achieving the balance.

Lori – Potentially leave open and decide which one is best. The idea of the presentation would be to get something out there to work from.

Charlee – Going back to example from Avista, say topic is income verification. Should we use net or gross income? That way you're coming in with ideas and maybe don't know justification. So Avista says, this is our topic – they talk about the pros/cons and then discussion starts. Very conversational.

Lori – I like that. Would be nice for everyone to come to the meeting with ideas.

Yochi – Might be useful to set topic before agenda goes out, won't always be able to do that but would be helpful.

Lori – The document we are talking about would help with that.

Charlee – I think it would eventually fall into place as you finish one meeting, you will know topics for next one.

Lori – I think it's important for all groups to come with their perspectives. We have to make sure we go through and have everybody provide comments. If no agreement was reached, come up with next steps. And follow up with meeting notes.

Hanna – I think PSE starts out their meetings with a couple of slides to show how feedback from prior meeting impacted setting the agenda for next meeting. Also shows questions unresolved. I can send you an example.

Lori – That would be helpful and provides closure from previous meeting.

Charlee – Another thing Avista does is send out list of key decisions and dates – like the meeting minutes.

Lori – I like idea of sending out and keeping a list of key decisions. We're at our stopping point – let's talk about Third Party Facilitator. I would like to suggest we try a few of these meetings with the process outlined and have those people down the path, if you guys are good with that.

Yochi – I think we are willing to do that. What we laid out here is much more active and time-consuming facilitation role for meetings that will take place three times a month. Certainly, open to have the company play that role. And if the work can't be done with existing staff, hire third party or make space to get it done. Avista has staff that works almost exclusively on energy assistance. Most of us on this call have other jobs not focusing on just that.

Lori – That is a good point. We'll talk about that internally and then come back with recommendation.

Cory – I do think today's meeting has been very productive – a good example is how we can build consensus and talk through things. If we decide we're not going to move forward with third party, at least in the near term, it would be good to agree if we do reach that point of third party, we need to figure out how to do that and how we decide. Maybe it's just checking in at each meeting, maybe it's an anonymous survey to give feedback. Some meetings can get tense and we may decide a third-party facilitator is needed. Cascade may realize this is a big undertaking and it would be more productive to have someone more focused. So, I think we need to figure out a way for a check in.

Lori – I think that's a good idea and it should be part of the meetings going forward. It's important everyone feels comfortable. Check in is important. So, for next week's meeting with small group – what topics should we discuss?

Yochi – There are 2 short term things, not necessarily at the next meeting but they are important. One is current year program changes, and the other is putting our topic list together and selecting the first one.

Lori – So we can start with current year program changes – that's probably the most immediate need.

Charlee – I think it will be helpful to have a check in with Avista before the meeting on the 7th

Lori – I agree. Meeting adjourned.

0:0:0.0 --> 0:0:4.420

Blattner, Lori

Thanks for joining today. I sent out a.

0:0:5.250 --> 0:0:9.90

Blattner, Lori

The agenda not with a lot of morning, but.

0:0:10.510 --> 0:0:16.50

Blattner, Lori

But with a little bit of a pre warning just to kind of set the stage for or hoping to talk about today.

0:0:16.790 --> 0:0:17.360

Blattner, Lori

Uh.

0:0:18.60 --> 0:0:27.750

Blattner, Lori

I think just internally as we're kind of talking about where we're at, it seems like it would be a good idea maybe to take a step back.

0:0:28.460 --> 0:0:31.750

Blattner, Lori

And just do a little bit of a reset with the committee.

0:0:33.900 --> 0:0:38.810

Blattner, Lori

I think it's really important. I think all of us have the same goal, right?

0:0:39.950 --> 0:0:47.520

Blattner, Lori

And I think just recognizing that the trying to figure out the best way to provide assistance to our customers.

0:0:48.870 --> 0:1:0.70

Blattner, Lori

You know, trying to make sure that the people that need help are getting it. I think we're all on the same page with that. And so it's really the when we get down to the details of of how we do that and.

0:1:1.20 --> 0:1:7.180

Blattner, Lori

Uh, I just trying to think about how we can make sure that.

0:1:7.920 --> 0:1:27.610

Blattner, Lori

That these meetings are productive and and you know that we have some well documented processes for a how the meetings run and then how we make decisions and how we track stuff moving forward. I think if we spend a little bit of time today working on that, I really think that that's gonna help us.

0:1:28.480 --> 0:1:36.370

Blattner, Lori

Uh, as we do go forward to have a a more productive process than a better working group so.

0:1:37.170 --> 0:1:43.360

Blattner, Lori

If if everybody's alright with that kind of as a project and A and an objective.

0:1:44.570 --> 0:1:47.740

Blattner, Lori

That's really what we were thinking, maybe that we can focus on.

0:1:48.590 --> 0:1:54.830

Blattner, Lori

Uh for the meeting today, so I'm seeing some head nods. But is that everybody good with that?

0:1:57.320 --> 0:1:58.130

Charlee Thompson

That's good with me.

0:1:57.750 --> 0:1:59.360

Corey Dahl (PCU-he/him) (Guest)

Yeah, that sounds good to me.

0:1:59.850 --> 0:2:0.270

Navarro, Hanna (UTC)

Yep.

0:2:0.430 --> 0:2:0.790

Blattner, Lori

OK.

0:2:2.620 --> 0:2:4.630

Blattner, Lori

So I I put up on this screen.

0:2:5.990 --> 0:2:7.570

Blattner, Lori

The agenda that we sent out.

0:2:8.510 --> 0:2:9.920

Blattner, Lori

And.

0:2:11.540 --> 0:2:13.330

Blattner, Lori

So the the 1st.

0:2:15.690 --> 0:2:19.810

Blattner, Lori

I guess the first topic will be defining the the process.

0:2:20.580 --> 0:2:36.140

Blattner, Lori

And then we thought it also might be helpful to at the end, kind of set the agenda for the next meeting so that we all kind of know what we're gonna talk about next time and we can provide some information ahead of time. But just to get that agreement on what we're going to talk about.

0:2:37.480 --> 0:2:37.930

Blattner, Lori

Uh.

0:2:39.90 --> 0:2:49.180

Blattner, Lori

So I think the first thing maybe to to talk about is I guess first, is there anything that we put on the agenda?

0:2:50.570 --> 0:2:55.700

Blattner, Lori

Anything else that we should add to the agenda as far as discussion points?

0:2:56.370 --> 0:2:57.910

Blattner, Lori

On the process side of things.

0:2:59.600 --> 0:3:1.390

Blattner, Lori

And I've got just a.

0:3:3.140 --> 0:3:9.570

Blattner, Lori

So meeting scheduling the agendas and then how the meeting format works, is there anything else that you guys wanna have?

0:3:13.480 --> 0:3:26.650

Yochi Zakai

Yeah, I guess the one thing that I think it might be good to add is you know we we made a request for a third party facilitator. So it might be good to discuss that as well.

0:3:43.630 --> 0:3:44.580

Blattner, Lori

Any other topics?

0:3:52.920 --> 0:3:58.980

Blattner, Lori

So I guess to start off with and on the scheduling side of things.

0:3:59.770 --> 0:4:5.980

Blattner, Lori

Uh, we have the larger weak committee and then we kind of.

0:4:7.90 --> 0:4:10.470

Blattner, Lori

As a result of trying to work through the.

0:4:11.310 --> 0:4:18.730

Blattner, Lori

You know the quick energy discount program implementation idea. They've added this smaller group.

0:4:19.680 --> 0:4:20.220

Blattner, Lori

Uh.

0:4:20.810 --> 0:4:22.290

Blattner, Lori

So kind of curious.

0:4:23.10 --> 0:4:25.580

Blattner, Lori

Does it make sense to continue to have these?

0:4:26.120 --> 0:4:28.690

Blattner, Lori

Uh, smaller group meetings?

0:4:29.570 --> 0:4:36.190

Blattner, Lori

Should we be having these meetings with the entire advisory group? Should we be doing both?

0:4:38.400 --> 0:4:40.400

Blattner, Lori

Just thoughts from you guys on.

0:4:41.290 --> 0:4:44.130

Blattner, Lori

You know, we want to be, we don't wanna waste people's time.

0:4:44.730 --> 0:4:46.450

Blattner, Lori

We're going to make sure everybody's included.

0:4:47.140 --> 0:4:49.500

Blattner, Lori

Uh, that wants to be Charlie. Go ahead.

0:4:51.20 --> 0:4:51.920

Charlee Thompson
Yeah. Thanks.

0:4:52.400 --> 0:5:0.390

Charlee Thompson
Umm, I think it makes sense to keep going with the subcommittee meetings. I think they're probably easier to coordinate and like you said, it might be a a more efficient use of time.

0:5:0.910 --> 0:5:13.580

Charlee Thompson
Umm, I guess unless everyone on the full leaf group wants to be on the subcommittee, then it just becomes the WEAFF group. But yeah, I'm. I'm for the smaller working group.

0:5:20.650 --> 0:5:21.260

Blattner, Lori
Video.

0:5:21.80 --> 0:5:21.390

Tillis, Daniel
And.

0:5:24.40 --> 0:5:24.730

Tillis, Daniel
Good, Lorena.

0:5:27.880 --> 0:5:28.450

Lorena Shah
Excuse me.

0:5:29.120 --> 0:5:39.410

Lorena Shah
I think one thing I just wanna check myself on just so I'm understanding it correctly. We had originally started this small group to talk about kind of that interim.

0:5:40.190 --> 0:5:51.980

Lorena Shah
Piece of you know the puzzle while as my understanding, the larger subcommittee was gonna continue working on the Permanent AMP program or is that still the?

0:5:53.50 --> 0:6:0.680

Lorena Shah
The landscape that we're in are or are we now thinking that it might be the small this subcommittee that's really?

0:6:1.580 --> 0:6:10.10

Lorena Shah
Getting down to the details on the the proposed AMPED or we still focused on a transitional program.

0:6:11.510 --> 0:6:12.180

Tillis, Daniel
Yeah, you're.

0:6:11.540 --> 0:6:15.680

Blattner, Lori
And I think that's sort of the that's sort of the question that we're working through is.

0:6:16.420 --> 0:6:16.930

Blattner, Lori
Uh.

0:6:18.100 --> 0:6:22.190

Blattner, Lori
If we if we decide to keep the smaller group, what is the role of the small group?

0:6:24.300 --> 0:6:30.970

Blattner, Lori
And how does that fit into the the larger advisory group? So I think that's a very pertinent question.

0:6:31.970 --> 0:6:41.690

Tillis, Daniel
Yeah. And and your question is exactly where I was. I was starting to go as we we actually started the the way I recall it, we actually started the smaller group meetings.

0:6:42.890 --> 0:6:50.280

Tillis, Daniel
It might have been Charlie who said it in. We had the follow up meeting after our original.

0:6:51.920 --> 0:7:20.730

Tillis, Daniel
Reintroduction of the AMPED program the larger, full AMPED program with an implementation date proposed at no later than October 1st, 2023. And then we had a meeting with a smaller group about a week later because Yochi wasn't able to attend the larger meeting and have some concerns that he shared via e-mail. And then Corey had some concerns, I think late in the meeting and they were really specific to SMI versus AMI and 150% versus 200% and so.

0:7:20.830 --> 0:7:34.980

Tillis, Daniel
The follow up meeting was to address those and then I think it was Charlie who suggested that or share with us in that meeting that some of the other utilities were had subcommittees or subgroups meeting more often on an energy discount program or discount rate program.

0:7:36.50 --> 0:7:49.460

Tillis, Daniel
And we're working toward the, you know, the October 23 date as well. And that's I think when we decided to continue having the smaller group meetings to work more specifically on some of the details of.

0:7:50.140 --> 0:8:17.470

Tillis, Daniel

A energy or a rate discount program, and then bring those items back to the larger group to discuss. I think is what the plan was. And then of course the engine reprisal happened and and that that's what we talked a lot about in between. So I think that's where we are with these or how they started. And I think as Lori just said, the question is if we wanna keep them, what is the purpose of the smaller group meetings?

0:8:18.660 --> 0:8:23.30

Tillis, Daniel

And how often and duration and all those all those questions.

0:8:31.160 --> 0:8:32.210

Yochi Zakai

Yeah.

0:8:32.980 --> 0:9:3.150

Yochi Zakai

You know, I would be interested in hearing from Lori a little bit more. This is Yoki. I'll. I'll. I'll say really quick that I think it makes sense to have a small group that meets more often. I think it should be, you know, open to everybody in the advisory committee and those that wanna come. Can I don't think we have to send out every invite. I think we did a good job at the last meeting being like hey, this group exists. We're meeting. Let us know if you want to join.

0:9:3.400 --> 0:9:18.770

Yochi Zakai

And I think what we have the big groups, it would be good to, you know the the big advisory group meetings would be good to update them on what's been accomplished in the in the small group. But I don't think they need to be a part of all the detailed discussions.

0:9:19.830 --> 0:9:45.130

Yochi Zakai

What I don't have a good sense of and I wanna lean on Lorena a little bit for is, you know, which of these discussions are appropriate to have in the bigger group from the beginning. And I think particularly you know, you've proposed starting our discussions on changes to the current year program. And so I think.

0:9:45.900 --> 0:10:16.110

Yochi Zakai

It makes sense to me. And um, the again, I wanna hear what Lorena and others think about it, but I think it makes sense to me that the smaller group would be working on kind of the longer term changes to to the program, but I'm not sure you know we're talking about, you know, current air changes as you know that are going to happen within a couple months to, you know to the WEA program. You know like we.

0:10:16.170 --> 0:10:29.300

Yochi Zakai

Outlined, you know, at the last meeting if that's something that we might wanna have, you know, the

the big group have input on right away. So I'll stop talking and and Lorena, can I get your thoughts on that?

0:10:31.360 --> 0:10:32.110

Lorena Shah

Yeah.

0:10:33.890 --> 0:10:42.200

Lorena Shah

I think that makes sense. I think anything that is a change for this current season should probably be with the larger advisory group that.

0:10:43.480 --> 0:11:18.390

Lorena Shah

So that they can weigh in on that. I am currently. It appears the only cap Rep on the small group right now that I'm aware of, or at least that's here today. And so that I if we're gonna be working on the longer term, which makes sense. I mean that's how we're doing it in PSE. There's a bill discount rates, sub work group that's a sub work group of the advisory committee. But that has a lot more cap representation on it than this one does. So I think we probably maybe once we determine the focus of this do another invite to the CAP agency. So there are a couple more representatives.

0:11:18.510 --> 0:11:23.610

Lorena Shah

On on this group to talk long term. So I think that's where where I'm at.

0:11:31.350 --> 0:11:31.780

Blattner, Lori

Well.

0:11:32.560 --> 0:11:33.270

Blattner, Lori

On the way in.

0:11:36.440 --> 0:11:36.910

Blattner, Lori

Anna.

0:11:37.920 --> 0:11:38.470

Blattner, Lori

Andrew.

0:11:41.360 --> 0:11:45.590

Navarro, Hanna (UTC)

I'm sorry, Lori, you were cutting out just a bit there.

0:11:46.770 --> 0:11:48.940

Navarro, Hanna (UTC)

Yeah, I I agree that a small.

0:11:49.870 --> 0:11:56.740

Navarro, Hanna (UTC)

Group is valuable for um discussing the details of the energy discount program.

0:11:59.910 --> 0:12:8.500

Navarro, Hanna (UTC)

Going forward, but I yeah, I think it would be useful to maybe determine in the larger group.

0:12:8.760 --> 0:12:9.550

Navarro, Hanna (UTC)

Um.

0:12:11.180 --> 0:12:21.760

Navarro, Hanna (UTC)

What issues should be dealt with through the small group versus the big group, and then just some function to report back to the bigger group?

0:12:23.40 --> 0:12:24.630

Navarro, Hanna (UTC)

I think would also be valuable.

0:12:33.190 --> 0:12:36.20

Corey Dahl (PCU-he/him) (Guest)

Yeah, I this is Corey. I I agree.

0:12:37.200 --> 0:12:41.190

Corey Dahl (PCU-he/him) (Guest)

With that I I do think that since program changes would be more imminent.

0:12:42.450 --> 0:12:49.720

Corey Dahl (PCU-he/him) (Guest)

For this year, have them with a larger group just to get everyone with the agencies looped into that conversation immediately and then.

0:12:50.850 --> 0:12:54.750

Corey Dahl (PCU-he/him) (Guest)

As Hanna said, I think reporting back to the larger group from small group work.

0:12:55.90 --> 0:13:0.440

Corey Dahl (PCU-he/him) (Guest)

Umm does make sense, especially since the small group is going to be meeting more frequently.

0:13:1.150 --> 0:13:8.560

Corey Dahl (PCU-he/him) (Guest)

Umm and extending invites to agency folks to these meetings that they can attend might be might be helpful to just to have more.

0:13:9.440 --> 0:13:9.850

Corey Dahl (PCU-he/him) (Guest)
Umm.

0:13:10.980 --> 0:13:16.130

Corey Dahl (PCU-he/him) (Guest)
More folks with that direct experience involved in those conversations to the extent they can.

0:13:17.280 --> 0:13:18.210

Corey Dahl (PCU-he/him) (Guest)
They can participate.

0:13:25.680 --> 0:13:28.310

Blattner, Lori
How does that sort of sum up so?

0:13:29.190 --> 0:13:34.830

Blattner, Lori
The current year program changes would be discussed in the full committee.

0:13:36.0 --> 0:13:40.330

Blattner, Lori
The long term program we would meet with a small group.

0:13:41.190 --> 0:13:44.500

Blattner, Lori
Plan to report back to the full committee and then.

0:13:45.810 --> 0:13:51.400

Blattner, Lori
Explained in the full committee, kind of that plan and then re extend the invitation.

0:13:52.310 --> 0:13:52.740

Blattner, Lori
Uh.

0:13:53.430 --> 0:13:56.610

Blattner, Lori
So that anybody that wants to be part of these small group meetings would have.

0:13:57.540 --> 0:14:4.110

Blattner, Lori
Yeah, with full knowledge of what the small groups going to be talking about, they they would then be able to to decide whether or not they want to.

0:14:6.570 --> 0:14:6.910

Blattner, Lori
That.

0:14:9.380 --> 0:14:10.50

Blattner, Lori

Well, that sort of.

0:14:9.150 --> 0:14:28.40

Yochi Zakai

Yeah, I think that sounds good. And we can and tap can also commit to doing some more outreach after we have that meeting if some more agencies don't voluntarily step up, we can contact them and encourage them because as Lorena said, I think ideally we have more than one one agency Rep at the meeting.

0:14:29.920 --> 0:14:39.150

Yochi Zakai

Charlie, I'm curious. You know, I know you've participated in the Avista process. Do you recall how many agencies sent reps to to the small group?

0:14:40.240 --> 0:14:47.210

Charlee Thompson

Yeah, that's a good question. I think it's a small handful, definitely more than one, probably less than four or five.

0:14:48.690 --> 0:14:50.260

Charlee Thompson

I can check quickly but yeah.

0:14:56.160 --> 0:14:56.510

Charlee Thompson

Umm.

0:14:48.950 --> 0:14:56.530

Yochi Zakai

OK, cool. Yeah, it doesn't matter. It's just good to get a sense of how things have gone elsewhere. So thank you.

0:14:59.600 --> 0:15:5.980

Blattner, Lori

I think that's sort of answers the decision on the on the purpose sort of answers the question on.

0:15:6.800 --> 0:15:14.400

Blattner, Lori

A. Whether or not to to keep the small group, I think we agreed that having the small group to talk about the long term program, I said.

0:15:28.590 --> 0:15:33.460

Blattner, Lori

Uh, and then talking about. So then the meeting schedule?

0:15:34.170 --> 0:15:39.680

Blattner, Lori

Uh, currently, I believe we've got a meeting scheduled for the small group.

0:15:40.480 --> 0:15:42.690

Blattner, Lori

And the entire group.

0:15:44.710 --> 0:15:47.970

Blattner, Lori

Help me out, Dan or Shannon. I think it is December.

0:15:49.640 --> 0:15:51.510

Blattner, Lori

Like the 21st or something.

0:15:53.760 --> 0:16:10.90

Tillis, Daniel

Yeah, they're, they're both that week. The full advisory group, actually, they're both on that date. The 21st? Yeah. It just happened to work out that way based on the advisory group being once a month. And the small group being, I think every two weeks, I think is what we had scheduled right now.

0:16:14.80 --> 0:16:25.670

Tillis, Daniel

We have another small group meeting scheduled for actually next week this coming Wednesday the 7th. This one got moved from Thanksgiving Week, so we're kind of a little bit off what the the schedule would be.

0:16:29.40 --> 0:16:33.390

Blattner, Lori

So I guess I'm curious when I think about the 21st, a couple of questions.

0:16:34.920 --> 0:16:39.890

Blattner, Lori

Is that too close to the holidays to get good representation from?

0:16:40.540 --> 0:16:43.160

Blattner, Lori

The full group, if we wanna try to make.

0:16:44.790 --> 0:16:46.240

Blattner, Lori

They're gonna try to talk about.

0:16:47.160 --> 0:16:49.380

Blattner, Lori

Yes, you're correct. Program changes.

0:16:50.740 --> 0:16:54.270

Blattner, Lori

Would we be at better off seeing if we could move that up a week?

0:16:55.900 --> 0:17:0.650

Blattner, Lori

And then it seemed to me like having both meetings the same day maybe is.

0:17:1.560 --> 0:17:4.800

Blattner, Lori

Is problematic. We're gonna try to report back.

0:17:6.150 --> 0:17:11.60

Blattner, Lori

The folders are progress, so I'll just throw those couple of things out and see what you guys do.

0:17:17.560 --> 0:17:25.960

Navarro, Hanna (UTC)

I this is Hannah with staff. I would prefer having that big group meeting a week earlier than the 21st.

0:17:31.610 --> 0:17:33.780

Blattner, Lori

The for the folder full commit.

0:17:35.580 --> 0:17:36.490

Corey Dahl (PCU-he/him) (Guest)

Yeah, that's fine with me.

0:17:39.70 --> 0:17:39.460

Charlee Thompson

Same.

0:17:38.810 --> 0:17:40.610

Sellards, Andrew (UTC)

Yes, this is Andrew with staff. I yeah, same here.

0:17:41.200 --> 0:17:41.440

Charlee Thompson

Umm.

0:17:41.480 --> 0:18:4.260

Tillis, Daniel

Yeah. And I think if if we decide that, I think it's a good decision. I just I think we send it out as that's the schedule and it if folks can't attend, that's OK because trying to find a date and time where everybody can attend is is gonna be challenging at at any time. But certainly they changed that. Now it's I think we just put it on the schedule and hope that we get good participation so.

0:18:5.490 --> 0:18:12.510

Yochi Zakai

Yeah, it's about 10 days from now. It's not or 12 days. I guess it's not a ton of time, but it is a.

0:18:13.200 --> 0:18:14.680

Yochi Zakai

Yeah. Yeah, it is noticed.

0:18:12.980 --> 0:18:16.840

Tillis, Daniel

Right. But that holiday week will be challenging, so yeah.

0:18:16.170 --> 0:18:23.600

Yochi Zakai

No, I I agree. I'm. I'm available, but don't wanna force other people who already have plans to be with family to do something else.

0:18:26.180 --> 0:18:29.270

Blattner, Lori

Was that the 14th that we're talking about then is that?

0:18:32.750 --> 0:18:34.280

Tillis, Daniel

Uh, yes, that'd be a week earlier.

0:18:33.300 --> 0:18:36.50

Blattner, Lori

I'm sure my screen. Sorry I can't delete you.

0:18:36.780 --> 0:18:38.740

Tillis, Daniel

Yeah, that'd be a week earlier the 14th.

0:18:40.150 --> 0:18:44.950

Tillis, Daniel

And I know the full advisory group is normally 4 to 5.

0:18:47.300 --> 0:18:49.790

Tillis, Daniel

Mountain time 3 to 4 Pacific times so.

0:18:54.490 --> 0:19:0.0

Lorena Shah

I'm not available on the 14th. I'm available on the 21st that time actually.

0:19:0.950 --> 0:19:4.340

Lorena Shah

That works better for my agency, but I don't know about others.

0:19:13.380 --> 0:19:20.530

Charlee Thompson

Yeah, actually it looks like NW Naturals Subcommittee on the same thing. Bill discount rate is the 14th from 3 to 4 Pacific.

0:19:24.150 --> 0:19:25.90

Tillis, Daniel

That's the challenge.

0:19:24.480 --> 0:19:25.390

Blattner, Lori

What about the?

0:19:24.240 --> 0:19:26.440

Charlee Thompson

But I don't know how much overlap, yeah.

0:19:27.10 --> 0:19:27.390

Tillis, Daniel

Yeah.

0:19:27.40 --> 0:19:28.280

Blattner, Lori

What about the 15th or?

0:19:35.130 --> 0:19:35.580

Blattner, Lori

Ah.

0:19:27.190 --> 0:19:41.120

Lorena Shah

I think a lot of the agencies tend to be their holidays. It's the in between Christmas and New Year's, the tough week or this in going into the holiday, most are still running full programs and stuff.

0:19:46.650 --> 0:19:49.930

Yochi Zakai

Sorry Lorena, I didn't catch that. Can you say it again?

0:19:50.660 --> 0:20:11.350

Lorena Shah

I was just saying I think the 21st probably is OK for a majority of the agencies. We're still usually kind of up in full running until about the Friday before Christmas when things start really slowing down. It's the week after. That's really tough. So I'm feeling like the 21st would still have a really good shot at getting most of the agencies.

0:20:17.570 --> 0:20:19.190

Charlee Thompson

Yeah, I could attend the 21st also.

0:20:19.990 --> 0:20:21.560

Yochi Zakai

I'm unavailable as I mentioned.

0:20:27.390 --> 0:20:33.690

Blattner, Lori

If we if we did the full committee meeting, left that on the 21st.

0:20:35.570 --> 0:20:37.450

Blattner, Lori

Should we try to move the?

0:20:38.550 --> 0:20:40.240

Blattner, Lori

Small groups so that it's not the same.

0:20:44.70 --> 0:20:45.770

Blattner, Lori

Or should we cancel this small group?

0:20:47.490 --> 0:21:17.520

Yochi Zakai

So if I can skip around a little bit, I think you know the the next thing you have down that is is the duration and you know one of the things that we mentioned the last time we met also and in their written document was that we feel like 90 minutes would be good because that would give us a chance to dive in a little more and so.

0:21:17.830 --> 0:21:32.580

Yochi Zakai

Yeah, I think that it probably if if we are gonna meet again. I I I think we should have probably 90 minutes set up for that. And so yeah, if we're gonna have another meeting on that day it probably doesn't make sense to do so.

0:21:37.300 --> 0:21:45.840

Blattner, Lori

There was sort of that's sort of where I was going. So it's good to bring in that the duration causes file, but it seems like that's a lot so.

0:21:47.180 --> 0:21:47.460

Blattner, Lori

Right.

0:21:48.120 --> 0:21:56.840

Tillis, Daniel

And I think that that helps us with the rest of December, maybe. So then after that, what do we think of frequency of small group meetings I I think.

0:21:58.250 --> 0:22:5.780

Tillis, Daniel

Well, I guess I'll, I won't say what I think. What do we think of frequency of small group meetings and then frequency of the the full advisory group meetings?

0:22:10.500 --> 0:22:11.880

Blattner, Lori

So this would put.

0:22:12.990 --> 0:22:18.140

Blattner, Lori

This is the think we set full green meetings. This is the third.

0:22:19.680 --> 0:22:21.10

Blattner, Lori

Uh, Wednesday, right?

0:22:24.390 --> 0:22:28.330

Tillis, Daniel

Right now, the full advisory group meetings are scheduled for the third Wednesday of every month.

0:22:31.320 --> 0:22:42.600

Blattner, Lori

It sounds like maybe that makes sense to leave that since some of the other, it sounds like the other utilities are sort of stat and so if we keep if we keep that date, maybe that's.

0:22:43.650 --> 0:22:44.720

Blattner, Lori

Clear for everybody.

0:22:46.860 --> 0:22:48.200

Blattner, Lori

To work around other utilities.

0:22:53.610 --> 0:22:53.790

Sellards, Andrew (UTC)

Yep.

0:22:52.880 --> 0:22:55.760

Navarro, Hanna (UTC)

Yeah, keeping keeping that time works for me.

0:22:56.320 --> 0:22:57.780

Sellards, Andrew (UTC)

As with that the Greeble, that's fine, I.

0:23:1.810 --> 0:23:2.250

Yochi Zakai

Yeah.

0:23:1.590 --> 0:23:2.260

Blattner, Lori
So then.

0:23:3.80 --> 0:23:5.920

Blattner, Lori
This small community van around that.

0:23:8.800 --> 0:23:16.10

Blattner, Lori
It seems like it would make sense perhaps to go on the off weeks to like the second.

0:23:17.140 --> 0:23:18.800

Blattner, Lori
Four weeks of a month, maybe.

0:23:21.680 --> 0:23:23.250

Charlee Thompson
Yeah, I think that makes sense.

0:23:24.330 --> 0:23:25.620

Charlee Thompson
Avista has been going.

0:23:26.520 --> 0:23:33.980

Charlee Thompson
Maybe since July, I think every other, so every two weeks the 1st and 3rd or I can afford for 90 minutes.
So I think that would be kind of on par.

0:23:35.380 --> 0:23:46.380

Charlee Thompson
PSE is kind of trying to get their process through faster, so I think they're doing two hour 2 hour meetings either every week or every other week. But I think this makes sense for cascade.

0:23:51.390 --> 0:23:52.60

Corey Dahl (PCU-he/him) (Guest)
Yeah, that works.

0:23:54.420 --> 0:23:55.640

Blattner, Lori
With that boy.

0:23:57.60 --> 0:23:58.630

Corey Dahl (PCU-he/him) (Guest)
Yes, sorry, that's that was Corey.

0:23:59.300 --> 0:24:3.890

Blattner, Lori
OK. Because I just want to be sure we hear from everybody, how about staff is that?

0:24:7.90 --> 0:24:8.220

Navarro, Hanna (UTC)

Yeah, that works.

0:24:9.980 --> 0:24:11.240

Blattner, Lori

And Wednesday.

0:24:14.720 --> 0:24:20.320

Lorena Shah

We still looking at 2 to 3 for that on the 2nd and 4th or two to 3:30.

0:24:23.190 --> 0:24:24.80

Lorena Shah

Was that?

0:24:26.40 --> 0:24:26.330

Blattner, Lori

Speak.

0:24:25.450 --> 0:24:27.860

Lorena Shah

Got another standing meeting at that time.

0:24:29.570 --> 0:24:30.60

Tillis, Daniel

Yeah, right.

0:24:29.240 --> 0:24:30.840

Blattner, Lori

I think that's kind of open for discussion.

0:24:31.650 --> 0:24:34.760

Tillis, Daniel

Right now it's two to three on wednes those Wednesdays, right?

0:24:35.220 --> 0:24:35.930

Lorena Shah

Right.

0:24:36.170 --> 0:24:36.540

Tillis, Daniel

OK.

0:24:39.930 --> 0:24:47.200

Tillis, Daniel

I mean, I think it's open for discussion if if you know the group thinks there's a better time on those days or a better day of the week.

0:24:58.170 --> 0:24:59.720

Lorena Shah
Looking at the 2nd and.

0:25:3.900 --> 0:25:4.490

Lorena Shah
And like.

0:25:7.250 --> 0:25:16.220

Lorena Shah
3:00 to 4:30 would be most ideal, but I can make 2:00 to 3:30. This is a disappearing small group, so my other meeting can wait for a few months if need be.

0:25:20.170 --> 0:25:21.280

Blattner, Lori
Has to be selfish.

0:25:21.370 --> 0:25:24.950

Blattner, Lori
UH-430 Pacific is 530 now so.

0:25:26.310 --> 0:25:27.590

Blattner, Lori
If be nice to do it.

0:25:26.500 --> 0:25:28.300

Lorena Shah
Very good point. Fair enough.

0:25:32.10 --> 0:25:32.420

Blattner, Lori
OK.

0:25:33.550 --> 0:25:38.160

Tillis, Daniel
Yeah. So did we decide that the small group meetings would also be 90 minutes in duration?

0:25:39.170 --> 0:25:40.640

Tillis, Daniel
So both both meetings OK.

0:25:45.130 --> 0:25:48.60

Blattner, Lori
OK. So we'll get those on the calendar.

0:25:50.500 --> 0:25:51.100

Tillis, Daniel
What about?

0:25:50.350 --> 0:25:51.360

Blattner, Lori

I guess we'll have the.

0:25:52.880 --> 0:25:53.430

Blattner, Lori

Go ahead. Yeah.

0:25:52.380 --> 0:25:59.490

Tillis, Daniel

What about earlier in the day AM instead of afternoon on the on Wednesdays for the small group meeting is or.

0:26:0.230 --> 0:26:2.160

Tillis, Daniel

Does anybody have any good options for those?

0:26:3.560 --> 0:26:4.250

Tillis, Daniel

For AM.

0:26:7.640 --> 0:26:15.90

Yochi Zakai

I'm wide open. I only have a lunch hour meeting, so noon Pacific on Wednesdays as my only recurring thing.

0:26:18.940 --> 0:26:23.530

Lorena Shah

I have a standing 10:00 o'clock meeting which is like falls right in the middle of the morning.

0:26:28.360 --> 0:26:28.990

Charlee Thompson

And I have a.

0:26:28.20 --> 0:26:30.110

Lorena Shah

I could do like an 8:30 to 10:00 or a.

0:26:30.830 --> 0:26:39.770

Lorena Shah

Are at 10:30. They usually only 1/2 hour 10:30 to noon. Something in there I don't know. Or that 2:00 to 3:30 will work for me as well.

0:26:43.80 --> 0:26:45.490

Charlee Thompson

Yeah, I was going to say I was standing 930 to 10.

0:26:47.140 --> 0:26:47.930

Charlee Thompson
To add to the.

0:26:48.850 --> 0:26:50.150

Charlee Thompson
Tango, yeah.

0:26:51.820 --> 0:26:55.510

Tillis, Daniel
So that are we saying 2:00 to 3:30 Pacific Time is still the best time.

0:26:57.90 --> 0:27:4.140

Charlee Thompson
Yeah. Or I think we're gonna just also gave a late morning time, which I don't know if that works for everyone.

0:27:3.960 --> 0:27:6.490

Yochi Zakai
Yeah, I heard 10:30 to noon also, right.

0:27:6.820 --> 0:27:7.200

Charlee Thompson
Umm.

0:27:6.20 --> 0:27:7.260

Lorena Shah
And 30 to noon.

0:27:9.370 --> 0:27:11.960

Tillis, Daniel
I'm fine with 10:30 to noon if that works for people.

0:27:14.590 --> 0:27:15.380

Charlee Thompson
That works with me.

0:27:14.820 --> 0:27:17.110

Blattner, Lori
That better than the than the afternoon.

0:27:18.950 --> 0:27:21.660

Corey Dahl (PCU-he/him) (Guest)
I'm sorry. What was the date on that again? I will double check my calendar.

0:27:22.760 --> 0:27:25.130

Blattner, Lori
As a second four weeks of the month.

0:27:25.110 --> 0:27:26.620

Corey Dahl (PCU-he/him) (Guest)
I need to unlock your iPhone first.

0:27:26.700 --> 0:27:29.680

Blattner, Lori
Either 2:00 to 3:30 or.

0:27:30.630 --> 0:27:31.570

Blattner, Lori
10:30 to move.

0:27:39.810 --> 0:27:40.940

Corey Dahl (PCU-he/him) (Guest)
Yeah, I can make that work.

0:27:43.260 --> 0:27:45.140

Blattner, Lori
Uh. Which one afternoon or morning?

0:27:59.460 --> 0:28:0.700

Pfordte, Byron
You may be checking with the dog.

0:28:3.590 --> 0:28:7.780

Corey Dahl (PCU-he/him) (Guest)
I know she there's someone out in the hallway and she's not happy about it.

0:28:11.890 --> 0:28:14.510

Blattner, Lori
Did you prefer the morning or the afternoon, please?

0:28:18.650 --> 0:28:19.590

Corey Dahl (PCU-he/him) (Guest)
I.

0:28:20.640 --> 0:28:25.410

Corey Dahl (PCU-he/him) (Guest)
You know, I I could make either work. Afternoon might be a little bit better, but I can. I can make either work. What?

0:28:32.250 --> 0:28:33.780

Blattner, Lori
I'm not sure if we get a good consensus.

0:28:35.650 --> 0:28:40.690

Tillis, Daniel
I would say it's a. It's a light. Lean toward afternoon. That's what I feel like I'm hearing, but.

0:28:43.560 --> 0:28:44.750

Yochi Zakai
Have we heard from Hannah?

0:28:47.290 --> 0:28:47.910

Yochi Zakai
Andrew.

0:28:47.520 --> 0:28:56.410

Navarro, Hanna (UTC)
I'm I'm I'm available at either of those times. I think afternoon might be a slightly preferable, but either would work.

0:28:57.880 --> 0:29:4.130

Sellards, Andrew (UTC)
Yeah. Just looking at mine and Andrew Roberts calendar, uh, simultaneous and I think afternoons typically work a little bit better.

0:29:6.350 --> 0:29:6.650

Blattner, Lori
OK.

0:29:9.430 --> 0:29:10.670

Blattner, Lori
Sounds like it's even.

0:29:12.740 --> 0:29:13.660

Blattner, Lori
That's something you know.

0:29:15.570 --> 0:29:20.680

Blattner, Lori
OK, so I think that answers all of us scheduling questions, so we'll.

0:29:22.680 --> 0:29:31.670

Blattner, Lori
We'll send out those meeting invite to the folks on this call and then after we have the a chance to make that.

0:29:33.820 --> 0:29:34.290

Blattner, Lori
Uh.

0:29:35.470 --> 0:29:43.510

Blattner, Lori
Announcement. I guess if we're both gonna be on the 21st, then we can decide or we can extend the invitation to anybody else that wants to to join that.

0:29:45.440 --> 0:29:46.790

Blattner, Lori

It's a good time blocked off.

0:29:50.430 --> 0:29:51.440

Blattner, Lori

OK. So then.

0:29:51.820 --> 0:29:54.140

Blattner, Lori

Uh on agenda list?

0:29:55.950 --> 0:29:56.500

Blattner, Lori

Ohh.

0:29:57.540 --> 0:30:0.870

Blattner, Lori

So wanted to talk a little bit about the process for.

0:30:1.560 --> 0:30:3.730

Blattner, Lori

Ohh creating the agenda.

0:30:6.140 --> 0:30:6.880

Blattner, Lori

And I think.

0:30:7.730 --> 0:30:15.800

Blattner, Lori

So I haven't obviously been part of this for a long time. I think there's sort of a standing agenda for some standing agenda items for the full committee.

0:30:16.510 --> 0:30:17.670

Blattner, Lori

That cracked.

0:30:23.160 --> 0:30:30.330

Tillis, Daniel

Umm, maybe a couple minor ones, but I don't think there's there. There aren't many that are standing recurring.

0:30:31.130 --> 0:30:33.150

Tillis, Daniel

Discussions for the full advisory group.

0:30:35.260 --> 0:30:39.930

Tillis, Daniel

Maybe typically maybe an update on how the year is gone, but.

0:30:41.700 --> 0:30:48.290

Tillis, Daniel

Not not much. That's recurring every every meeting. Not right now. But Shannon, you know, correct me if I'm wrong on that and.

0:30:50.700 --> 0:31:14.830

Steed, Shannon

I did originally lists a few items here, but obviously over time these things would change as we get through the program year. The initial items I had are regular LIHEAP program, updates, are AMPED program design, CBO pilot, program development and enrollment growth and outreach, and then open discussion or new items by all members.

0:31:18.970 --> 0:31:22.920

Tillis, Daniel

And those are all great topics, and they're all important topics. But I think based on.

0:31:23.460 --> 0:31:33.950

Tillis, Daniel

Umm, you know the request of focus on fewer topics in the meetings. I don't think we're gonna be able to keep or want to keep all of those as recurrent topics on on the agenda.

0:31:39.650 --> 0:31:40.480

Blattner, Lori

So I guess maybe.

0:31:39.620 --> 0:31:40.550

Yochi Zakai

Yeah, I.

0:31:42.410 --> 0:31:46.820

Blattner, Lori

I was just going to say that maybe that's a questions, should the full committee.

0:31:47.500 --> 0:31:51.650

Blattner, Lori

Meeting 20. Change some of these app like some standing update.

0:31:52.930 --> 0:31:53.460

Blattner, Lori

Ah.

0:31:55.720 --> 0:32:1.40

Blattner, Lori

Because it seems like if we're gonna be meeting in the small committee to try to work through some decisions on the.

0:32:2.70 --> 0:32:4.460

Blattner, Lori

Program going forward, we might be able to be.

0:32:5.230 --> 0:32:8.180

Blattner, Lori

Or just create some standing updates. Everybody knows what to buy.

0:32:9.400 --> 0:32:9.920

Blattner, Lori

Hold it.

0:32:11.400 --> 0:32:12.110

Blattner, Lori

Thoughts on that?

0:32:18.220 --> 0:32:23.830

Yochi Zakai

Charlie, I'm curious to hear how that communication happens in the in the other groups you've participated in.

0:32:25.480 --> 0:32:38.280

Charlee Thompson

Yeah, so since joining NYC at the end of June, the full committees for PSTN Avista have only met like once or twice. So I haven't quite gathered a consistent idea of how they run it.

0:32:39.400 --> 0:32:48.940

Charlee Thompson

Honestly, I'm not recalling like a a lot of time dedicated to an update from the subcommittee in the full group, but I think it is. We should do that.

0:32:50.180 --> 0:32:52.270

Charlee Thompson

To what extent or how detailed that I know?

0:32:54.930 --> 0:32:57.940

Charlee Thompson

Yeah, I don't know how helpful that is. Hopefully this a little bit helpful.

0:32:59.950 --> 0:33:3.980

Blattner, Lori

Do you think have a kind of standing agenda items is that?

0:33:5.10 --> 0:33:5.560

Blattner, Lori

5 minutes.

0:33:7.360 --> 0:33:12.940

Charlee Thompson

Yes, and give me a SEC to refresh on what what they're consistently talking about.

0:33:22.230 --> 0:33:25.20

Yochi Zakai

And while she's looking there, I would say.

0:33:26.780 --> 0:33:53.570

Yochi Zakai

I think you know tap would be interested in having a meeting devoted to, you know, the CBO outreach program. You know, we proposed it. We're excited about it, but we certainly, I think with sufficient advanced notice, you know, the gas can do some thinking about it and come prepared to discuss how to make that happen. But.

0:33:55.330 --> 0:33:55.980

Yochi Zakai

Having.

0:33:56.800 --> 0:34:6.200

Yochi Zakai

Given it the head space when it's just one item on on an agenda of many, but it deserves the headspace, so we we we we should make some time for that.

0:34:8.160 --> 0:34:10.310

Blattner, Lori

So we've got 3 minutes perhaps.

0:34:12.320 --> 0:34:12.820

Blattner, Lori

Some.

0:34:13.470 --> 0:34:15.290

Blattner, Lori

Some update times and then.

0:34:16.970 --> 0:34:18.960

Blattner, Lori

Like many meeting, maybe should be.

0:34:19.690 --> 0:34:22.670

Blattner, Lori

We should pick something as a group to discuss.

0:34:23.890 --> 0:34:26.840

Blattner, Lori

You know, I don't know, maybe it's 1/2 hour of kind of update.

0:34:28.0 --> 0:34:35.30

Blattner, Lori

Uh regular updates and then the other hour or discussion on a topic for that.

0:34:42.480 --> 0:34:46.160

Navarro, Hanna (UTC)

This is Hannah from staff.

0:34:46.280 --> 0:35:0.200

Navarro, Hanna (UTC)

Umm, I think that per like perhaps the LIHEAP update that seems like something that could be probably just emailed and then I think the AMP design update is something.

0:35:2.560 --> 0:35:3.30

Navarro, Hanna (UTC)

That.

0:35:4.220 --> 0:35:32.240

Navarro, Hanna (UTC)

Uh should be reported on at each advisory committee meeting, and then I agree with Yuki that CBO outreach. I don't know if that needs to be a standing update at every meeting, but should have a specific meeting to dedicated to that because I do think that 30 minutes at the start of each meeting just for updates might not be the most valuable use of time.

0:35:37.920 --> 0:35:38.390

Blattner, Lori

Carly.

0:35:40.780 --> 0:35:57.750

Charlee Thompson

Yeah, I just looked at what PSE universe have been talking about in their full low income advisory group meetings and it's it's kind of it doesn't seem like very consistent PSE and it might be fall under the category of updates. But PC has been talking about like a survey that they've done as cap agencies and this has been talking about.

0:35:58.270 --> 0:36:1.930

Charlee Thompson

Um, conditions that came out of their CEIP.

0:36:2.0 --> 0:36:15.780

Charlee Thompson

Be settlement or their D R&D R Community Engagement plan or or things like that. So and I think both have been giving maybe maybe this is a consistent item but giving updates on their disconnection efforts and practices.

0:36:17.720 --> 0:36:25.730

Charlee Thompson

Yeah. So things that come up out of this EP or GRC or whatever else along with this connections and community engagement.

0:36:31.630 --> 0:36:33.180

Blattner, Lori
So maybe a short.

0:36:35.360 --> 0:36:41.330

Blattner, Lori
Sounds like maybe a short update on things that the company thinks might be interesting for the advisory group.

0:36:42.160 --> 0:36:43.0

Blattner, Lori
And then uh.

0:36:44.360 --> 0:36:46.720

Blattner, Lori
Discussion on whatever the topic is.

0:36:48.720 --> 0:36:51.970

Blattner, Lori
That we that we've agreed there bringing up is that.

0:36:56.910 --> 0:37:2.220

Navarro, Hanna (UTC)
Yeah, that sounds good. I think a good way to start out each meeting too is just kind of.

0:37:3.900 --> 0:37:5.350

Navarro, Hanna (UTC)
Recap any.

0:37:5.990 --> 0:37:9.100

Navarro, Hanna (UTC)
Uh, unresolved items from the last meeting.

0:37:19.780 --> 0:37:22.290

Corey Dahl (PCU-he/him) (Guest)
Yeah, I think that makes sense. Hanna, this is Corey.

0:37:39.750 --> 0:37:40.960

Blattner, Lori
That sort of sum up.

0:37:42.20 --> 0:37:43.530

Blattner, Lori
Or I guess the other thing would be.

0:37:54.240 --> 0:37:55.430

Blattner, Lori
That sort of sum up what we.

0:38:4.740 --> 0:38:7.70

Navarro, Hanna (UTC)

Yeah, that I think that looks good to me.

0:38:13.580 --> 0:38:13.940

Yochi Zakai

Umm.

0:38:14.910 --> 0:38:16.680

Yochi Zakai

Yeah, I think.

0:38:18.580 --> 0:38:25.950

Yochi Zakai

I I guess I'm not 100% sure cuz I haven't participated in a ton of these meetings, but at first glance I think it's OK.

0:38:26.30 --> 0:38:42.60

Yochi Zakai

Umm I I don't love the term AMPED that cascade has been using for their program, but I'm OK with that in acknowledgement that that is what you have been using. But terminology should not be the hang up for getting into substance.

0:38:48.340 --> 0:38:49.710

Blattner, Lori

We'll just call it the new program.

0:38:48.770 --> 0:38:49.820

Lorena Shah

I think this looks.

0:38:48.710 --> 0:38:50.910

Pfordte, Byron

Currently, we don't have AMPED anywhere.

0:38:54.740 --> 0:39:2.440

Lorena Shah

They say I think this looks good and will feel manageable and productive for the CAP agencies.

0:39:9.110 --> 0:39:11.520

Corey Dahl (PCU-he/him) (Guest)

This looks good to public counsel too.

0:39:18.120 --> 0:39:19.570

Blattner, Lori

Anna, stop. Marie.

0:39:21.540 --> 0:39:22.100

Blattner, Lori
Uh.

0:39:24.680 --> 0:39:25.180

Blattner, Lori
I guess.

0:39:26.80 --> 0:39:35.230

Blattner, Lori
It sounded like I don't know, it's some of the feedback and and information that we received and then some of the other meeting discussions.

0:39:37.10 --> 0:39:39.740

Blattner, Lori
Maybe trying to take a?

0:39:40.870 --> 0:39:42.610

Blattner, Lori
You know this new program?

0:39:43.320 --> 0:39:43.980

Blattner, Lori
And.

0:39:44.50 --> 0:39:45.380

Blattner, Lori
It's uh.

0:39:46.180 --> 0:39:50.710

Blattner, Lori
Breaking it into topics and honestly, I don't know what that looks like, but.

0:39:51.330 --> 0:39:51.960

Blattner, Lori
Uh.

0:39:52.820 --> 0:39:55.660

Blattner, Lori
You know, calculating the number of meetings we have between.

0:39:56.310 --> 0:40:0.80

Blattner, Lori
I don't know. Now in in June or something and.

0:40:1.360 --> 0:40:9.620

Blattner, Lori
And then trying to calculate, you know, trying to come up with the topic list and prioritize that a little bit and assign those to.

0:40:10.620 --> 0:40:13.740

Blattner, Lori

Uh to different meetings? Maybe something like that would be.

0:40:15.570 --> 0:40:17.580

Blattner, Lori

I don't know a good way. At least you could start.

0:40:18.180 --> 0:40:20.910

Blattner, Lori

But I'm open to other anybody else that has ideas.

0:40:22.910 --> 0:40:23.850

Blattner, Lori

Other approach that.

0:40:35.310 --> 0:40:40.360

Yochi Zakai

Early. Can I lean on you again? Do you know how topics have been set in the other?

0:40:41.980 --> 0:40:42.440

Charlee Thompson

Yeah.

0:40:41.380 --> 0:40:42.860

Yochi Zakai

Processes you've participated in.

0:40:43.540 --> 0:40:44.460

Charlee Thompson

Yeah, sure.

0:40:46.460 --> 0:40:51.710

Charlee Thompson

So I'll keep talking about Avista because they're process, works, works pretty well and I've enjoyed being a part of that.

0:40:53.450 --> 0:41:3.610

Charlee Thompson

So they have 4 overarching topics, it's joint administration between utility and agency, self attestation verification, and then LIHEAP interface.

0:41:5.290 --> 0:41:8.440

Charlee Thompson

But it's not like 4 weeks. Let's do one topic per.

0:41:9.150 --> 0:41:17.420

Charlee Thompson

Each meeting, it's kind of like we'll do. There's probably a bunch of subtopics that could be that we could detail here under joint administration, for example.

0:41:18.40 --> 0:41:20.740

Blattner, Lori

Can you give me those four again? Slow, I type slow.

0:41:20.510 --> 0:41:27.340

Charlee Thompson

Yeah, yeah. Joint administration between utilities and cap agencies. Self attestation.

0:41:29.520 --> 0:41:31.240

Charlee Thompson

Uh, income verification.

0:41:32.920 --> 0:41:34.390

Charlee Thompson

And LIHEAP interface.

0:41:38.170 --> 0:41:38.680

Tillis, Daniel

Charlie.

0:41:38.60 --> 0:41:39.780

Charlee Thompson

And what? Umm.

0:41:40.780 --> 0:41:42.890

Tillis, Daniel

Sorry, go ahead. I'll, I'll ask after you finish.

0:41:43.620 --> 0:41:44.640

Charlee Thompson

OK. Yeah, yeah.

0:41:45.720 --> 0:41:55.520

Charlee Thompson

What Avista has been doing is kind of so like, let's this week we're gonna start first thing off with joint administration. I think they might come up with like here are some of the things that we need to talk about.

0:41:57.760 --> 0:42:0.90

Charlee Thompson

Yes, learn it and uh, verification of thought it.

0:42:1.190 --> 0:42:6.230

Charlee Thompson

Umm, so yeah, this will say. Here's something that we can talk about. And then within that meeting some of the.

0:42:6.980 --> 0:42:12.330

Charlee Thompson

Advisory group members might also say like, but we also haven't thought about this or talking about this, so that all come up as well.

0:42:14.430 --> 0:42:26.70

Charlee Thompson

And what we end with is usually after every meeting there's at least one decision point, maybe two decision points, and then we'll kind of say like, OK, this is on deck for in two weeks from now when we meet again.

0:42:28.170 --> 0:42:34.920

Charlee Thompson

And I think that's works. That's worked pretty well. And like I said, they've been doing it for about five months and we're I think finalizing.

0:42:35.970 --> 0:42:37.120

Charlee Thompson

What stage are we at?

0:42:38.940 --> 0:42:42.690

Charlee Thompson

We still talk about LIHEAP interface and then kind of talking about some data collection.

0:42:45.240 --> 0:42:47.580

Charlee Thompson

As well, but it it seems to be going.

0:42:48.620 --> 0:42:52.350

Charlee Thompson

I think going pretty smoothly with that, that process and that cadence.

0:42:54.930 --> 0:42:55.280

Tillis, Daniel

And.

0:42:54.360 --> 0:42:57.430

Blattner, Lori

But do you have a? Do you have a a?

0:42:58.470 --> 0:43:1.290

Blattner, Lori

A page that have lists out all the topics.

0:43:2.730 --> 0:43:7.800

Charlee Thompson

Um, just the broad topics and the decision points.

0:43:10.310 --> 0:43:11.60

Charlee Thompson

I can probably.

0:43:11.740 --> 0:43:19.270

Charlee Thompson

Briefly, just make an outline of like joint administration and hear all the things we talked about attestation and here all the things we talked about, if that's helpful and I can share that.

0:43:20.470 --> 0:43:21.220

Charlee Thompson

But I think.

0:43:20.150 --> 0:43:21.820

Blattner, Lori

Yeah, if you wanna share that with us though.

0:43:20.400 --> 0:43:33.90

Tillis, Daniel

Am I remembering correctly? Am I remembering correctly? The those meetings are specific to creating the the rate discount program that is targeted to start October 1st, 2023.

0:43:33.590 --> 0:43:33.850

Charlee Thompson

Yep.

0:43:34.580 --> 0:43:46.690

Tillis, Daniel

So somewhere just I'm not sure if that was clear for you. So those those subcommittee meetings are specific to a rate discount. They're not on several other topics, so.

0:43:47.360 --> 0:43:47.750

Charlee Thompson

Yeah.

0:43:49.360 --> 0:43:49.820

Tillis, Daniel

So.

0:43:48.940 --> 0:43:56.330

Yochi Zakai

I would say I do think that they are designing their bill, discount and arrearage management program at the same time.

0:43:56.940 --> 0:43:57.350

Tillis, Daniel

OK.

0:43:59.410 --> 0:44:4.90

Tillis, Daniel

Which was the plan for our small groups as well, was to be.

0:44:5.690 --> 0:44:10.520

Tillis, Daniel

On AMPED or whatever, it ends up being called and whatever the program design ends up being. So yeah.

0:44:11.180 --> 0:44:11.520

Charlee Thompson

Mm-hmm.

0:44:19.230 --> 0:44:27.290

Yochi Zakai

And again, I didn't courage. You again. I'm sure if you reach out to Avista, that they'd be willing to chat about how things go and perhaps share some of some of their materials.

0:44:28.190 --> 0:44:28.540

Tillis, Daniel

Sure.

0:44:28.390 --> 0:44:39.100

Yochi Zakai

And and and I think these four topics do overlap well with you know the you know the the issues that I laid out in.

0:44:40.80 --> 0:44:44.30

Yochi Zakai

In the the tapped feedback document I provided as well.

0:44:47.760 --> 0:44:49.50

Tillis, Daniel

Yeah, I do feel like.

0:44:51.140 --> 0:45:8.470

Tillis, Daniel

We have some topics that might be good to resolve at the smaller team, small group level, or at least make some recommendations at the smaller group level and take to the larger revisory group that we might want to start with before we, you know, move into.

0:45:9.680 --> 0:45:16.990

Tillis, Daniel

The rate discount plus orange management, such as you know some of the ideas around changes to current year we've.

0:45:18.630 --> 0:45:29.760

Tillis, Daniel

So the possibility of a of a summer reach forgiveness program, current reach forgiveness program. And then and with the weave changes at the AMI component, getting that integrated so.

0:45:30.920 --> 0:45:31.980

Tillis, Daniel

I think those are.

0:45:32.860 --> 0:45:34.710

Tillis, Daniel

To me, there are higher priority than.

0:45:36.330 --> 0:45:40.900

Tillis, Daniel

The rate discount average management you know as we have time to to address those topics.

0:45:45.680 --> 0:45:50.920

Yochi Zakai

And didn't we say we would pursue those in the larger group rather than the smaller group?

0:45:53.280 --> 0:45:54.50

Tillis, Daniel

Uh, we we.

0:45:53.10 --> 0:45:56.560

Blattner, Lori

I think that'll be part of our meeting for this family, so.

0:45:57.630 --> 0:46:13.350

Tillis, Daniel

We did say that I don't know, and that's fine, if that's what we want to do. I just didn't know if we wanted to try to talk through options and make recommendations in the smaller group and then take those to the larger group to get feedback. So I I'm OK with either approach.

0:46:20.520 --> 0:46:27.570

Yochi Zakai

I guess I defer to to Lorena if she thinks it's problematic. If we start talking about it first, then the small group.

0:46:30.40 --> 0:46:41.520

Lorena Shah

I think probably if we can spend a little bit of time in the small group and kind of tee up, tee it up for, I don't know, I go back and forth. It'll really depend on how much is.

0:46:42.500 --> 0:46:49.380

Lorena Shah

What the impact on the agencies is gonna be if there is a, you know, relatively high impact or sort of any impact it really needs to.

0:46:51.700 --> 0:47:5.110

Lorena Shah

I think it really probably needs to stay with a larger group and we just we take some time in the next couple advisory committee meetings to really drill down on that. So everybody can feel comfortable with that way forward.

0:47:5.770 --> 0:47:10.760

Lorena Shah

Now, do we spend a little bit of time here, maybe formulating that that that might be beneficial?

0:47:12.200 --> 0:47:14.230

Lorena Shah

But maybe not come to decisions here.

0:47:17.410 --> 0:47:18.900

Blattner, Lori

I think logistically.

0:47:19.60 --> 0:47:22.120

Blattner, Lori

Ohh what we decided was.

0:47:23.870 --> 0:47:38.70

Blattner, Lori

Our next meeting will be the full committee on December 21st, so maybe we start in the whole committee with that. Maybe that's our topic for the for the next meeting and then we can kind of see at the end of that meeting we'll have and decide whether.

0:47:39.220 --> 0:47:43.420

Blattner, Lori

That's a topic for the small group. Then in January, or if it's.

0:47:45.70 --> 0:47:48.60

Blattner, Lori

You know, if we get far enough along, maybe it's it's not an issue we can.

0:47:48.880 --> 0:47:50.560

Blattner, Lori

Finalized things like that.

0:48:0.780 --> 0:48:1.360

Blattner, Lori

Ohh.

0:47:52.880 --> 0:48:6.390

Yochi Zakai

Yeah, I would observe that we do have another small group on the calendar for December 7th next Wednesday. So you know, perhaps if we wanna have some initial discussions we could we could start there and then.

0:48:6.470 --> 0:48:25.750

Yochi Zakai

Umm. And then bring it to the bigger group. But I wanna be sensitive to lorena's concern which I think if I'm hearing it correctly is that we have sufficient time in the large group to thoroughly think through and vet the.

0:48:27.10 --> 0:48:36.510

Yochi Zakai

Impact on the work that the agencies will need to do is probably the the appropriate focus for for that group.

0:48:40.90 --> 0:48:41.360

Blattner, Lori

Forget about the 7th baby.

0:48:52.90 --> 0:49:16.180

Yochi Zakai

And maybe that's a good way to think about it generally to if we're gonna bring updates to the small group that we should probably try to do that with a focus on how will these changes impact the, you know, the CAA's most rather than maybe some of the design decisions that are more company focused.

0:49:16.730 --> 0:49:23.90

Yochi Zakai

I'm just thinking through this now for the first time, so hopefully that's kind of makes sense.

0:49:24.620 --> 0:49:26.100

Blattner, Lori

So this update.

0:49:29.990 --> 0:49:30.600

Blattner, Lori

For this.

0:49:30.680 --> 0:49:34.60

Blattner, Lori

Yeah, this update here more focused on.

0:49:35.180 --> 0:49:36.430

Blattner, Lori

Impacts to the agency.

0:49:56.240 --> 0:50:4.390

Blattner, Lori

But we can reach out to Avista on the on the subcommittee. These we can reach out to Avista to.

0:50:7.110 --> 0:50:9.970

Blattner, Lori

Kind of get there topic list.

0:50:11.820 --> 0:50:12.700

Blattner, Lori
And maybe that's.

0:50:13.500 --> 0:50:15.290

Blattner, Lori
Something that we can work on in our.

0:50:16.800 --> 0:50:20.660

Blattner, Lori
Meeting next week too, it's it's working for them.

0:50:22.370 --> 0:50:23.30

Blattner, Lori
The topic.

0:50:29.330 --> 0:50:37.880

Yochi Zakai
And again, the the letter and the feedback that I provided had more than topics, but it's probably possible to still that down into topics as well.

0:50:39.190 --> 0:50:43.740

Yochi Zakai
It's although it's always harder to write something short than to write something wrong, right?

0:50:45.190 --> 0:50:46.840

Blattner, Lori
Especially for an attorney.

0:50:49.990 --> 0:50:53.100

Charlee Thompson
Yeah. Yukio is also thinking your letter might be a good.

0:50:53.960 --> 0:50:55.100

Charlee Thompson
Topic list outline.

0:51:5.270 --> 0:51:5.870

Blattner, Lori
And then.

0:51:8.400 --> 0:51:11.190

Blattner, Lori
I I think another so anything else on?

0:51:12.90 --> 0:51:13.620

Blattner, Lori
Uh, kind of the agenda?

0:51:14.920 --> 0:51:15.310

Blattner, Lori
Either.

0:51:16.960 --> 0:51:23.300

Blattner, Lori
That seems like a a place to start, and then obviously these would be set in stone and we can adjust it they need.

0:51:25.120 --> 0:51:26.100

Blattner, Lori
It started.

0:51:33.510 --> 0:51:34.40

Blattner, Lori
Have you?

0:51:39.490 --> 0:51:40.220

Blattner, Lori
And then.

0:51:42.450 --> 0:51:46.130

Blattner, Lori
Distribution of agenda and pre read material.

0:51:47.210 --> 0:51:47.770

Blattner, Lori
Uh.

0:51:49.300 --> 0:51:53.70

Blattner, Lori
A couple of days ahead. Did that need to be a full week ahead?

0:51:54.360 --> 0:51:56.480

Blattner, Lori
How much? How much lead time, I guess.

0:51:58.900 --> 0:52:1.290

Blattner, Lori
On I'm sending agenda though.

0:52:5.500 --> 0:52:7.700

Charlee Thompson
Maybe by the Friday of the week before.

0:52:8.500 --> 0:52:10.180

Charlee Thompson
If the meetings are happening on Wednesday.

0:52:11.370 --> 0:52:11.600

Blattner, Lori
You.

0:52:11.670 --> 0:52:13.440

Sellards, Andrew (UTC)
That's exactly what I was thinking.

0:52:14.730 --> 0:52:15.90

Charlee Thompson
Great.

0:52:17.80 --> 0:52:20.210

Corey Dahl (PCU-he/him) (Guest)
Get that? That's sufficient for for.

0:52:20.890 --> 0:52:27.590

Corey Dahl (PCU-he/him) (Guest)
Public counsel, we would also have the ability to request additional items to be added or modified.

0:52:29.940 --> 0:52:33.770

Blattner, Lori
Yeah, that would give everybody a chance to provide a little bit of feedback to you all.

0:52:34.0 --> 0:52:34.300

Corey Dahl (PCU-he/him) (Guest)
Sure.

0:52:36.710 --> 0:52:37.520

Corey Dahl (PCU-he/him) (Guest)
That makes sense to me.

0:52:47.960 --> 0:52:48.860

Blattner, Lori
Well for them.

0:52:51.280 --> 0:52:54.920

Blattner, Lori
Trying to run something that Skype well then meeting format.

0:52:56.100 --> 0:53:0.450

Blattner, Lori
Uh, we sort of talked about this honestly in the.

0:53:2.30 --> 0:53:5.500

Blattner, Lori
I think this first part we sort of talked about in the.

0:53:6.590 --> 0:53:7.760

Blattner, Lori
Discussion on agenda.

0:53:10.990 --> 0:53:11.580

Blattner, Lori
Ohh.

0:53:11.820 --> 0:53:40.470

Yochi Zakai
Yeah. And I guess one thing that I've been thinking about looking at that is maybe it will be helpful to start with a discussion of the topic. Perhaps instead of a proposal. I'm I'm I'm a little bit torn on this cuz I can appreciate that sometimes a proposal is the best thing that helps to get discussions started. But sometimes it also feels like, I guess what I don't.

0:53:47.240 --> 0:53:47.520

Blattner, Lori
Right.

0:53:41.140 --> 0:53:53.140

Yochi Zakai
What? What I wanna avoid is having feel like it's a it's a pre baked plan that comes and so there's a balance there and I'm not quite sure what the answer to achieving that balance is.

0:53:58.370 --> 0:54:1.720

Blattner, Lori
Well, and that's a potentially something we can.

0:54:3.120 --> 0:54:5.650

Blattner, Lori
We can revoke open to and.

0:54:7.710 --> 0:54:10.80

Blattner, Lori
Decide which works best for you.

0:54:11.780 --> 0:54:15.730

Blattner, Lori
The idea what the presentation would be exactly what you said to get something.

0:54:17.20 --> 0:54:21.10

Blattner, Lori
To toss it out there, right and then and then have something to work from.

0:54:23.630 --> 0:54:30.850

Blattner, Lori
But I guess also the proposal could come either way. The company could present it or someone else to present it.

0:54:35.610 --> 0:54:36.200

Blattner, Lori
Ah.

0:54:37.300 --> 0:54:41.370

Charlee Thompson
A thought on that going again, back to an example from Avista.

0:54:42.890 --> 0:54:51.160

Charlee Thompson
Like so say the topic is, let's talk about income verification. Should we use net or gross income?

0:54:52.420 --> 0:55:14.340

Charlee Thompson
To talk about that so that we would all know going into advance like of the meeting like, OK, we're gonna talk about net or gross income. So we'll coming in with our probably our ideas and maybe I don't know justification for that. And what Vista does is they kind of say like, OK, so here's our topic net versus gross income with net like what they've already thought through like he's kind of like the pros and cons of that with gross. Here's the pros and cons of this.

0:55:14.990 --> 0:55:23.470

Charlee Thompson
Go like discussion and then people kind of hop in and then it wiggles its way down to a decision point. So it's not quite a proposal, but Avista prepares.

0:55:24.420 --> 0:55:28.280

Charlee Thompson
Such that they can talk about both, I guess and then leave it open for discussion.

0:55:29.400 --> 0:55:31.460

Blattner, Lori
So it sounds like maybe start with a question.

0:55:33.980 --> 0:55:34.350

Blattner, Lori
Right.

0:55:33.90 --> 0:55:35.120

Charlee Thompson
Yeah. Yeah, very conversational.

0:55:37.290 --> 0:55:38.250

Blattner, Lori
And then the search.

0:55:40.260 --> 0:55:41.40

Blattner, Lori
I like that.

0:55:49.200 --> 0:55:53.510

Blattner, Lori

And we can send the in the agenda, right? We can send the.

0:55:56.930 --> 0:55:57.770

Blattner, Lori

That's topic.

0:56:0.70 --> 0:56:1.360

Blattner, Lori

Like you're saying, people.

0:56:2.990 --> 0:56:9.140

Blattner, Lori

Would be nice if everybody came to the the meeting with ideas kind of already.

0:56:9.850 --> 0:56:11.80

Blattner, Lori

You know positive, so.

0:56:12.600 --> 0:56:35.710

Yochi Zakai

Yeah. And for that to happen, I think it might be useful to even set the topic a little bit earlier than the agenda goes out. I mean, I we probably won't always be able to do that, but to the extent you know, we can I think at least for me it would be helpful to have more than you know you know, 2 1/2 days if it's a.

0:56:36.730 --> 0:56:41.840

Yochi Zakai

To to to at least know the topic. If not, maybe all the details that that go into it.

0:56:44.120 --> 0:56:44.530

Blattner, Lori

That's.

0:56:43.900 --> 0:56:46.410

Charlee Thompson

I think it'll eventually. Sorry, go ahead.

0:56:47.160 --> 0:56:54.430

Blattner, Lori

I was just gonna say so that that this kind of document that we're talking about for this just seems like maybe that would help with that.

0:56:58.920 --> 0:57:11.720

Charlee Thompson

And I was going to say yochi, I think it will eventually kind of fall into that anyway, like on say we finish our meeting on Wednesday, we'll know what the next topic hopefully is for the next Wednesday, which gives us, you know a few more days. And then Friday the agenda gets sent out.

0:57:20.220 --> 0:57:20.760

Blattner, Lori
Umm.

0:57:22.200 --> 0:57:25.570

Blattner, Lori
Delete that questions like it's about that, and then.

0:57:27.90 --> 0:57:38.680

Blattner, Lori
I think it's really important. I guess I would like to suggest that I think that these meetings, it's really important for all of the groups to come with and their perspectives.

0:57:39.330 --> 0:57:44.890

Blattner, Lori
And then have time, you know, kind of like we're doing today. Just be sure that we go through and have everybody give their comments.

0:57:46.280 --> 0:57:47.680

Blattner, Lori
You know, whatever, but topic is.

0:57:55.690 --> 0:58:3.920

Blattner, Lori
And then a an agreement or either reach an agreement on it's topic or I think we need to also maybe have a specific plan.

0:58:4.960 --> 0:58:14.800

Blattner, Lori
If if we didn't reach agreement on whatever the topic is in the meeting to keep things moving forward, we need to kind of set up a plan of, OK, what do we need to investigate next? What are the next steps?

0:58:15.900 --> 0:58:16.190

Blattner, Lori
No.

0:58:18.300 --> 0:58:22.410

Blattner, Lori
Have sort of halfway to get to the agreement on whatever that topic is, but.

0:58:28.500 --> 0:58:30.630

Navarro, Hanna (UTC)
Uh, yeah, that sounds right to me.

0:58:37.560 --> 0:58:39.0

Blattner, Lori
And then follow up.

0:58:40.930 --> 0:58:45.230

Blattner, Lori

We've been sending out a meeting notes. Is there anything else that we need?

0:58:51.90 --> 0:58:51.840

Navarro, Hanna (UTC)

Um.

0:58:53.150 --> 0:58:57.870

Navarro, Hanna (UTC)

I I think PRC starts out all of their meetings with.

0:58:58.500 --> 0:59:15.410

Navarro, Hanna (UTC)

Just two slides where they show how feedback from the prior meeting impacted setting the agenda for the next meeting and I can send you an example of that, but they list out there each of those.

0:59:16.930 --> 0:59:20.860

Navarro, Hanna (UTC)

If there were any questions that were unresolved also.

0:59:24.230 --> 0:59:25.540

Navarro, Hanna (UTC)

As just a way of.

0:59:27.820 --> 0:59:33.610

Navarro, Hanna (UTC)

Highlighting things that were unresolved in a place that isn't just in the meeting notes.

0:59:35.500 --> 0:59:40.200

Navarro, Hanna (UTC)

Which I I think is useful and I can send you an example of that.

0:59:42.20 --> 0:59:43.370

Blattner, Lori

Yeah, that would be super problem.

0:59:45.110 --> 0:59:51.350

Blattner, Lori

And that sort of helps provide, it sounds like that provides the closure from the previous meeting. We didn't make a decision.

0:59:52.170 --> 0:59:56.860

Blattner, Lori

Uh allows everybody to go back, think about it, and then maybe come back and make a decision.

0:59:57.810 --> 0:59:58.620

Blattner, Lori

At the next week.

0:59:59.610 --> 0:59:59.980

Navarro, Hanna (UTC)

Yeah.

1:0:7.0 --> 1:0:8.730

Charlee Thompson

Here I'm gonna put in the chat.

1:0:9.550 --> 1:0:11.900

Charlee Thompson

What, again? What if Vista does?

1:0:13.270 --> 1:0:24.490

Charlee Thompson

So Anna Matthew sends out a follow up e-mail the day of. Or maybe the day after the meeting that we had, and she always lists key decisions that happened at that meeting, but also key decisions to date.

1:0:25.130 --> 1:0:40.620

Charlee Thompson

Um discussion points so that that's kind of like what the meeting minutes where they come in to play the discussion points where the decisions of that day were achieved and then the talking point or the decision points for the next week. So everyone can prepare in advance.

1:0:49.610 --> 1:0:53.980

Blattner, Lori

I like that idea of sending out a keeping a list of the key decisions.

1:0:59.890 --> 1:1:0.330

Charlee Thompson

Yeah.

1:0:54.630 --> 1:1:3.10

Blattner, Lori

And setting us out after every meeting. So then it's sort of a reminder, this is what we've already decided. And then there's the new decisions. And like, here's what.

1:1:2.870 --> 1:1:9.150

Charlee Thompson

Yeah, it's very helpful. I always like just go back to the previous e-mail to remind myself of what happened weeks ago, yeah.

1:1:20.580 --> 1:1:23.580

Blattner, Lori

So that's sort of gets us through. We're a little bit over on time.

1:1:26.880 --> 1:1:39.560

Blattner, Lori

So on the third party facilitator, so I I completely understand where that comes from. You know sort of giving his phone in the last meeting or the the one before that.

1:1:40.430 --> 1:1:42.930

Blattner, Lori

I guess we would like to suggest that.

1:1:43.980 --> 1:1:53.40

Blattner, Lori

We try, you know, a few of these meetings with the system that we've outlined and we have those people down that path and.

1:1:55.260 --> 1:1:56.440

Blattner, Lori

If you guys are going to go back.

1:1:58.650 --> 1:2:28.850

Yochi Zakai

Yeah, I think we're willing to do that. I think, uh, you know, just just an acknowledgement of what we, you know, what we laid out here is a much more active and time consuming facilitation role for meetings that will take place three times a month. And so, you know, I think I'm open to certainly having the company play that role with the acknowledgement that that's a lot more work to do.

1:2:28.960 --> 1:2:41.930

Yochi Zakai

That can hopefully be done within, you know and. And I guess if the work can't be done within, you know the existing staffing, then you know hopefully something can be done about that to either hire a third party or make space to make sure it gets done.

1:2:44.590 --> 1:2:45.860

Blattner, Lori

That's a good point if it's.

1:2:46.450 --> 1:2:47.40

Blattner, Lori

Uh.

1:2:54.650 --> 1:2:58.190

Yochi Zakai

Because, yeah, I mean, I think with with Avesta we're speaking with.

1:2:59.670 --> 1:3:5.600

Yochi Zakai

As as I understand it, staff that you know, work almost exclusively on the.

1:3:6.0 --> 1:3:17.30

Yochi Zakai

Umm uh, you know, energy assistance programs and I know most of the folks on this call have jobs that have them focusing on much more than that.

1:3:18.970 --> 1:3:20.760

Blattner, Lori

Yeah, spread a little bit thinner.

1:3:23.150 --> 1:3:24.760

Blattner, Lori

So that's that is a good point.

1:3:26.480 --> 1:3:28.790

Blattner, Lori

We'll talk about that a little bit internally and then.

1:3:30.270 --> 1:3:30.900

Blattner, Lori

Back with them.

1:3:32.650 --> 1:3:33.470

Blattner, Lori

Recommendation.

1:3:32.890 --> 1:3:33.850

Corey Dahl (PCU-he/him) (Guest)

Yeah, I.

1:3:34.980 --> 1:3:36.320

Corey Dahl (PCU-he/him) (Guest)

Ohh sorry for interrupting alright.

1:3:37.600 --> 1:3:40.590

Corey Dahl (PCU-he/him) (Guest)

I I I do think that, you know, I think this has been a very.

1:3:41.350 --> 1:3:45.770

Corey Dahl (PCU-he/him) (Guest)

Today's meeting especially has been productive and I think we've had.

1:3:47.80 --> 1:3:50.460

Corey Dahl (PCU-he/him) (Guest)

A good example of how we can build consensus and talk through things.

1:3:51.180 --> 1:4:3.350

Corey Dahl (PCU-he/him) (Guest)

Um, if we if after the company discusses and we decide that ultimately we're not going to move forward with a third party facilitator, at least in the immediate term.

1:4:3.950 --> 1:4:7.30

Corey Dahl (PCU-he/him) (Guest)

Umm, I think it would be good to.

1:4:9.110 --> 1:4:18.270

Corey Dahl (PCU-he/him) (Guest)

Agree to a way that we can have the conversation of if there is a. If we do reach a point where it, it looks apparent where a third party facilitator is going to be.

1:4:19.390 --> 1:4:25.380

Corey Dahl (PCU-he/him) (Guest)

Really beneficial and moving the conversation forward, I think we need to figure out how we do that, how we decide that.

1:4:26.80 --> 1:4:30.370

Corey Dahl (PCU-he/him) (Guest)

Umm. And you know, maybe that's just checking in.

1:4:33.400 --> 1:4:35.700

Corey Dahl (PCU-he/him) (Guest)

At every meeting, perhaps.

1:4:36.860 --> 1:4:45.790

Corey Dahl (PCU-he/him) (Guest)

Sending out some sort of anonymous survey to give feedback about how meetings are going. I I don't know. I think there just has to be a way.

1:4:48.230 --> 1:4:51.170

Corey Dahl (PCU-he/him) (Guest)

To move forward because it it might not even be.

1:4:51.980 --> 1:5:3.830

Corey Dahl (PCU-he/him) (Guest)

A situation where you know meetings are especially tense or contentious where we decide we need a third party facilitator. It might be something more along the lines of what Yochi had said about, you know.

1:5:5.440 --> 1:5:12.950

Corey Dahl (PCU-he/him) (Guest)

Cascade realizing that wow, this is a big undertaking, it would be more productive to have someone more focused on this than be spread thin.

1:5:13.690 --> 1:5:17.800

Corey Dahl (PCU-he/him) (Guest)

So I I think that that's a long way of saying we should figure out a way to check in.

1:5:18.760 --> 1:5:20.490

Corey Dahl (PCU-he/him) (Guest)

Amongst everyone to to figure that out.

1:5:21.840 --> 1:5:31.220

Blattner, Lori

I think that's good and I think part of the the meetings you know going forward, I think that it's important for everybody to to feel comfortable.

1:5:31.900 --> 1:5:40.0

Blattner, Lori

Uh, you know, kind of just saying how things are going too, as part of the feedback. You know, if there's issues, we certainly wanna.

1:5:40.950 --> 1:5:45.380

Blattner, Lori

Hear those that have those too so that we can hopefully dress them so.

1:5:46.810 --> 1:5:47.670

Blattner, Lori

Check in is important.

1:5:49.640 --> 1:5:51.40

Corey Dahl (PCU-he/him) (Guest)

Yeah, that makes that makes sense to me.

1:5:54.890 --> 1:5:56.980

Blattner, Lori

So for next week's meeting.

1:5:59.190 --> 1:6:1.290

Blattner, Lori

As far as uh topic?

1:6:3.580 --> 1:6:9.450

Blattner, Lori

Is it is the best topic the we've we've program here.

1:6:10.290 --> 1:6:10.740

Blattner, Lori

Uh.

1:6:11.390 --> 1:6:13.780

Blattner, Lori

Topics for the.

1:6:14.340 --> 1:6:15.760

Blattner, Lori

Uh, call groups.

1:6:17.490 --> 1:6:21.780

Blattner, Lori

You know for next year. What what do you guys think is the most important topic to?

1:6:24.140 --> 1:6:25.180

Blattner, Lori

What kind of focus on that?

1:6:31.0 --> 1:6:38.770

Tillis, Daniel

And Lori, are you asking for the meeting next week with the small group or you asking for the meeting on the 21st for the advisory group?

1:6:39.670 --> 1:6:42.50

Blattner, Lori

Yeah, a small group first.

1:6:45.590 --> 1:6:53.490

Yochi Zakai

Yeah. So I think there are two short term things that based on this conversation come to mind that would be good to talk about again.

1:6:54.570 --> 1:7:14.490

Yochi Zakai

And we don't have to do both of them at the at the next meeting, but I think they're they're they're both important for, you know, establishing next steps. And, you know, one is the current year program changes and then the other is kind of putting together our topic list and selecting the first topic that we'll dive into.

1:7:18.980 --> 1:7:20.40

Charlee Thompson

Yeah, that sounds good to me.

1:7:23.720 --> 1:7:28.200

Blattner, Lori

So maybe start with current year program changes, because that's probably the most.

1:7:29.610 --> 1:7:31.200

Blattner, Lori

Immediate need and then.

1:7:32.200 --> 1:7:34.890

Blattner, Lori

If we if we get through that quickly, then maybe we can.

1:7:36.590 --> 1:7:38.240

Blattner, Lori

Move to the topic list of that.

1:7:43.800 --> 1:7:47.270

Blattner, Lori

Well, things are hanging in with us for about 10 minutes over I'd like to.

1:7:48.10 --> 1:7:54.220

Blattner, Lori

And on time. So I apologize for that, but anything anybody have anything else before we go?

1:7:58.440 --> 1:8:8.320

Charlee Thompson

Umm, it might be helpful to check in. I think you're planning to do it, but it might be helpful to check in with the best Avista on the topic list before the meeting on the 7th next week.

1:8:9.400 --> 1:8:9.860

Charlee Thompson

AM.

1:8:9.770 --> 1:8:10.20

Blattner, Lori

Yeah.

1:8:10.830 --> 1:8:11.860

Blattner, Lori

I think that's a good idea.

1:8:14.740 --> 1:8:17.710

Blattner, Lori

Anything we can plagiarize we're all about.

1:8:20.190 --> 1:8:29.170

Yochi Zakai

They just say thank you again for the tone reset. It's been very constructive and appreciate everyone coming together with the with that approach.

1:8:32.350 --> 1:8:32.840

Blattner, Lori

Thank you.

1:8:35.960 --> 1:8:38.730

Blattner, Lori

We're we're all on the same team. I think that's the most important.

1:8:39.430 --> 1:8:43.400

Blattner, Lori

You know, for this, for this discussion, we want the same outcome.

1:8:46.570 --> 1:8:48.740

Blattner, Lori

All right. Well, everybody have a fantastic weekend.

1:8:50.60 --> 1:8:51.580

Navarro, Hanna (UTC)

Thanks, Lori. Thanks everyone.

1:8:50.720 --> 1:8:52.710

Tillis, Daniel

Thanks. Talk to everybody later. Bye.

1:8:52.930 --> 1:8:53.300

Charlee Thompson

Fail.

1:8:53.590 --> 1:8:54.160

Sellards, Andrew (UTC)

Thank you all.

1:8:52.960 --> 1:8:54.630

Blattner, Lori

Thank you. Bye.

1:8:54.650 --> 1:8:55.310

Lorena Shah

Thanks all.

1:8:56.120 --> 1:8:56.500

Corey Dahl (PCU-he/him) (Guest)

Thanks.

December 16, 2022

Ms. Amanda Maxwell
Executive Director and Secretary
Washington Utilities & Transportation Commission
621 Woodland Square Loop SE
Lacey, WA 98503

Regarding: UG-210755 Compliance Filing to Commission Request for Updates to Advisory Group Pursuant to Order 09

Dear Ms. Maxwell:

In compliance with Paragraph No. 78 of Order 09 in Docket No. UG-210755, Cascade Natural Gas Corporation encloses for filing the minutes from its December 7, 2022, WEAFF Small Group Advisory meeting. The following document is submitted electronically as part of this filing:

- UG-210755-WEAF-Small-Group-Advisory-Meeting-Outcome-and -Minutes-12-16-2022.pdf

If you have any questions, please contact me at 208.377.6015 or Chris Mickelson at 509.734.4549.

Sincerely,

Lori Blattner

Lori Blattner
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Cascade Natural Gas Corporation
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Kennewick, WA 99336
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Attachment

WEAF Advisory Group

Agenda

December 7, 2022

KEY TOPICS: *Current year WEAFF changes and initial discussion on rate discount and arrearage management program topic list.*

GOALS FOR MEETING OUTCOME: *Gain agreement on current year WEAFF changes to be presented and discussed with the full advisory group. Begin discussion on rate discount and arrearage management program design meeting topic list.*

1. Stakeholder recommendations for current year WEAFF changes related to rate increases:

Key Decisions for Agenda item #1:

Recommendation to bring to full Advisory Group:

- File for current year WEAFF changes listed in 1a and 1b.
 - For 1b, modify the WEAFF calculator to add 25% to the pledge amount the current calculator generates based on unadjusted energy usage history.
 - Increase past grants/pledges issued to customers from 10/1/22 up to effective date by 25%, Cascade would calculate and issue the grants. Cascade will provide updated credit amounts to each agency so they can update their records.
 - Timeline – discuss at full Advisory Group on 12/21. If consensus is gained file on 12/22 with goal to have on the Commission Open Meeting agenda on 1/12/23. Cascade will request approval with Less than Statutory Notice with goal to have effective date shortly after 1/12/23.
- a. Increase max grant by 25% to \$625 to adjust for the GRC and PGA increases.

Discussion:

Lorena – Would this start as of Jan 1 or go back and recalculate October through whenever the start date is?

Dan – Depending on how long it takes us to get these changes made, we could retroactively issue customer grants for 25% more than what they've already received up to the cap of \$625. It's something we could probably do internally at Cascade with the data we've already received, rather than needing to have the agencies do that if this group thinks that is the right approach.

Lorena – I like that idea a lot. That would be a question to bring up to the larger group. I know how we track, and I think it would be relatively easy to adjust our records. For those that have agency databases it might be more complicated.

Yochi – I would just note for comparison purposes, PSE was requiring the agencies go through and recalculate. To the extent Cascade doing it on their own, the agencies would welcome the help.

Dan – Did PSE retroactively do something like that with increasing past grants?

Yochi – Yes, they did to October 1st for the beginning of the program year.

Dan – It sounds like we have general support for reactively doing that.

Hanna – To effectuate this change, do you need to file a deferred accounting petition, or would this require a tariff change or both?

Lori – We looked through our WEAFF tariff and I think it would require a tariff change. We will present to the full committee on the 21st. The last Commissions open meeting for 2022 is 12/22, so we wouldn't be able to get anything on their agenda, but would be for the January 12th meeting, then the next one is the 26th.

- b. Allow agencies to gross up past energy usage data by 25% to adjust for the GRC and PGA increases.

Additional questions discussed – Should we retroactively increase grant amounts for current year recipients from 10/1 to effective date? If so, would company do it or agencies? What complexities does it create for agency records? Bring discussion back to the larger group. January open meeting.

Discussion:

Dan – How would we make the gross up change to calculation? Chris has idea but not here.

Lori – He wanted to know if instead of doing past energy usage, use bill.

Lorena – Would it work to just add 25% to what the grant amount is and not use energy usage price?

Lori – I think that is what he was suggesting.

Lorena – What if we just add 25% on top of whatever the grant was up to \$625?

Dan – So your suggestion is to use the pledge amount the current calculator provides and have a formulate to gross that up 25%? For example, if it says \$400, then you increase by 25%.

Lorena – Have another row in current calculator that adds the 25%, that would be ideal.

Dan – For the retroactive who received a grant between Oct 1 and whatever the effective date ends up being, we have reports that could add the 25% and then have those applied to the customer's account. We would then provide the updated pledge amounts to the agencies so they can update their records.

- Options for incorporating AMI into the WEAFF grant calculation.

Key Decisions for Agenda item #2:

Stakeholders indicated the agencies could work with 2 calculators. Lori and Chris to provide more information on a possible approach via email and we'll schedule a meeting with the small group to discuss further if necessary. Goal is to bring recommendation to 12/21 full Advisory Group meeting once we have consensus.

Lori – Chris is not here so I will try to relay the information accurately. Chris visited with PSE and Avista to try and get some insight on what they are doing. PSE looked at counties they serve with median income and are basing the AMI calculation off the median county. I believe Avista is trying to create a calculator for each county, but only for a certain level above FPL. For the interim piece where we serve 17 counties in WA, it would be time consuming to create 17 calculators. If you think PSE's approach will work, maybe not permanently but for this year, that would be faster.

Lorena – Question – How Avista does it, once above 150% FPL, then it goes to AMI – would it be 2 calculators? One 0-150% and the other 150% up to 80%?

Lori – That is the way I understood. Calculate FPL and then once it is reached, it was up to 150%. Then, it looked at AMI. Yes, 2 step process, not sure if 2 calculators.

Dan – Then we will need to file incorporating our AMI into our calculation, correct?

Lori – The tariff would be simple because it would just add FPL or AMI, so all of this is behind the scenes.

Dan – Ok, so then we don't need to know exactly how we'll incorporate AMI by the 22nd.

Lori – We will need to figure it out for the large group meeting on 12/21.

Lorena – The CAP agencies recognize the time it's going to take to even do simplified version so I think we can accept 2 calculators.

Dan – Lori – do you think Chris can email this group with his recommendation to have 2 calculators per agency and how that would work? And then we can get feedback via email. We have a meeting next week, so we can review his email.

Lori – I think we canceled the one on the 21st.

Yochi – Believe we changed to January.

Dan – Let's try the email approach and if that doesn't work set up a meeting?

Lori – I think the main thing is using 2 calculators for now and use the median county approach – I think we can have that in place in January.

Yochi – The eligibility is set individually by county based on the higher 200% or 80% AMI. But the benefit curve is based on median county, so the eligibility level does have to be calculated individually for each county.

Lori – Is the eligibility included in the calculator or is that something the agencies identify?

Lorena – In PSEs, that is included. Household income, household size, then determines benefit.

Yochi – I'm surprised PSE's eligibility is based on median county. For some counties there will be 1 calculator because 80% AMI is going to be lower than 200% FPL.

3. Initial discussion on topic list for rate discount and arrearage management program creation.

Key Decisions for Agenda item #2:

The group agreed to the list below as our initial topic list with understanding that the list will likely change as discussions progress.

- Arrearage Management and Rate Discount Design
 - Design of income-based tiers
- Joint administration between utilities and community action agencies (CAA)
 - Ensuring utility-enrolled customers can access other services, including LIHEAP, weatherization, childcare, rental, banking, water assistance, etc.
 - Tracking number of customers enrolled by utilities that proceed to CAA intake.
 - Information sharing, i.e., individual customer demographics provided to CAAs.
- Enrollment
 - Self-attestation of income/HH size
 - Audits for verification
 - Type of income, length of enrollment, processing changes in income, time to provide documentation, selecting customers for audit, etc.
 - Use of categorical eligibility to either very incomes or enroll customers.
- Utility and CAA design a joint communication plan documenting:
 - Program launch, informing customers they are selected for audit, informing customers they are not income-qualified, and responding to media inquiries about eligibility and fraud.
- Managing overlap between LIHEAP and bill discount program; developing a plan to maximize use of federal funding.
- Reporting

Discussion:

Dan – We would like to get your feedback on key topics for our next small group discussions scheduled for January. I think we’re at the point where those topics will be about rate discount and arrearage management program creation. One approach we could take is using the feedback the stakeholders provided on Cascade’s temporary EDP as a guide for topics.

Yochi – I provided a list based off of the EDP feedback and put it in the meeting chat. One of the topics was monitoring legislation concerning CAA’s use Dept of Social Health Services Benefit Verification System for income. Didn’t want that added.

Dan – Interesting topic. We are close to finalizing in Oregon, use of OCHS data, mostly related to LIHEAP qualification. The data from OHCS will provide us the customer name, account number and household income size, FPL, SMI type information that we can use to auto enroll those customers into rate discount program at the correct tier level. We would like to figure out how we can get similar data for WA.

Charlee – Income based tiers came up first with Avista and early with PSE – it’s a natural leaning. Allows for smooth conversation, get more in depth, then come back and rely on income-based tiers. Everyone on this call has the detailed list so we’re all familiar with it, and I don’t think there are any objections or additions.

Dan – Lori, Chris and I have been in contact with Avista since last Friday. We’ve requested information about the process they’ve been following and asked for documentation they would be willing to share. They sent recent presentations they used for one of the meetings. It looks like they have 5 tiers for EDP. Program design should probably be up front, not just talking about a rate discount but potentially redesigning WEAFA/arrearage management program as well. For example, some utilities provide certain discount for forgiveness then customer must contribute a certain amount to sustain that, which I believe the Stakeholder group sees as a traditional AMP. I don’t know how Avista is doing that.

Charlee – I don’t recall but can check.

Dan – Another topic to add to the list would be reporting for both stakeholders and commission.

4. Set key topic(s) for next meeting

Key Decisions for Agenda item #2:

After a brief discussion the group selected the topics listed below for Key Topics for our next small group meeting scheduled for 1/11/23.

- Arrearage Management and Rate Discount Design
 - Design of income-based tiers

January 10, 2023

Ms. Amanda Maxwell
Executive Director and Secretary
Washington Utilities & Transportation Commission
621 Woodland Square Loop SE
Lacey, WA 98503

Regarding: UG-210755 Compliance Filing to Commission Request for Updates to Advisory Group Pursuant to Order 09

Dear Ms. Maxwell:

In compliance with Paragraph No. 78 of Order 09 in Docket No. UG-210755, Cascade Natural Gas Corporation encloses for filing the minutes from its December 21, 2022, WEAFF Small Group Advisory meeting. The following documents are submitted electronically as part of this filing:

- UG-210755-WEAF-Small-Group-Advisory-Meeting-Outcome-and -Minutes-1-10-2023.pdf
- UG-210755-WEAF Agenda-1-10-2023.pdf
- UG-210755-WEAF-Finalized-Minutes-1-10-2023.pdf

If you have any questions, please contact me at 208.377.6015 or Chris Mickelson at 509.734.4549.

Sincerely,

Lori Blattner

Lori Blattner
Director, Regulatory Affairs
Cascade Natural Gas Corporation
8113 W. Grandridge Blvd.
Kennewick, WA 99336
Lori.blattner@intgas.com

Attachment



WEAF Advisory Group Meeting
December 21, 2022 2:00 – 3:30pm Pacific

Welcome and roll call – *Shannon Steed*

Community Action Agencies	Contact
Blue Mountain Action Council	Sylvia Schaefer
Community Action Connections	Dalia Ochoa
Community Action of Lewis, Mason, & Thurston Counties	Dale Lewis, Sandra Koch
Coastal Community Action Program	Debbie Gregg
Chelan-Douglas Community Action Council	Vern Gurnard, Kristi Hills, Alan Walker
Kitsap Community Resources	Kandi Balandran, Julie Barleta
Lower Columbia Community Action Center	Deanna Dahlberg, Kathy Bates
NW Community Action Center	Jose Alvarez
OIC of Washington	Heidi Silva, Casandra Ochoa, Candi Jaeger
Opportunity Council	Marie Stangeland, Lorena Shah
Community Action of Skagit County	Misty Velasquez
Snohomish County Human Services Dept	Constance Hockett, Manu Morgan
WUTC Staff	
Hanna Navarro, Andrew Roberts, Andy Sellards	
The Energy Project	
Ross Quigley, Yochi Zakai	
Public Counsel	
Corey Dahl	
NW Energy Coalition	
Charlee Thompson	
Department of Commerce	
Michelle DeBell	
Cascade Natural Gas	
Mark Chiles, VP of Regulatory Affairs & Customer Service	Lori Blattner, Dir Regulatory Affairs
Dan Tillis, Dir Customer Experience	Chris Mickelson, Mgr Regulatory Affairs
Byron Pfordte, Mgr Customer Experience	Pam Archer, Regulatory Analyst
Shannon Steed, Consumer Specialist	

1. Company update
 - a. November WEAF Report recap – *Shannon Steed*
 - b. WEAF Small Group update - *Dan Tillis*
2. Unresolved items from the November meeting and dedicated discussion of an agreed upon topic
 - a. Arrearage forgiveness grant
 - i. *Dan Tillis* - Modify the WEAF calculator to add 25% to the pledge amount the current calculator generates based on unadjusted energy usage history.

- ii. *Dan Tillis* - Increase past grants/pledges issued to customers from 10/1/22 up to effective date by 25%, Cascade would calculate and issue the grants. Cascade will provide updated credit amounts to each agency so they can update their records.
 - iii. *Chris Mickelson* - Discussion of incorporation of AMI into the calculator
 - iv. *Lori Blattner* - File for current year WEAFF changes to include an increase in the pledge amount and incorporation of AMI
 - 1. Timeline: If consensus is gained, file on 12/22 with goal to have on the Commission Open Meeting agenda on 1/12/23. Cascade will request approval with Less than Statutory Notice with goal to have effective date on or shortly after 1/13/23.
3. Update on new program design focusing on agency impacts - *Dan Tillis*



**WEAF Advisory Group Meeting
December 21, 2022 2:00 – 3:30pm Pacific**

Welcome and roll call – *Shannon Steed*
Highlighted name indicates the member was present.

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Mark Chiles, VP of Regulatory Affairs & Customer Service	Lori Blattner, Dir Regulatory Affairs
Dan Tillis, Dir Customer Experience	Chris Mickelson , Mgr Regulatory Affairs
Byron Pfordte , Mgr Customer Experience	Pam Archer, Regulatory Analyst
Shannon Steed, Consumer Specialist	Noemi Ortiz

1. Company update

a. November WEAF Report recap – *Shannon Steed*

Steed, Shannon – Let’s move to our agenda... Reviewing the report - This is just a brief recap of the November WEAF report that I sent out by e-mail on December 14th. This is a snapshot of the spending that occurred during November. The first is just a spending overview of pledges, which again is just a snapshot of the most recent, so we can compare that to the previous program years to give us a landmark of where we are in comparison and tell us how our program year is progressing. So, with this

just being November, we're happy to see that we've had an increase in pledge spending between October and November, and a nice increase compared to November of last year as well. And I've also included our program year budget. We have 3 tiers for our program year, which is our base of \$1.2 million. And then we also have our 15% budget increase built in at \$1.4. Then we have an additional 5% soft cap as well, which takes us up to \$1.5 million. These three tiers are the same over the last three program years because of a rate case from 2016, which created a 5-year plan for us. The 2021 program year capped out that five-year plan for the budget, and we have carried that same budget over for the current year and the previous program year. So, the spending limits have not changed. I've also included a little granular data for the agency totals for the month, just to show us the different activity that's going on between our agency partners throughout our service territory. The last bit of information I have is the updated budget totals. This tells us how much is available for each tier of the budget level. So, we have a long way to go, and we have \$1.3 million left available to our final 5% soft cap for the program year. Any questions about that before we move on?

Yochi Zakai

With the Energy Project, no questions. Thank you for sharing. I would just note that I know it's kind of a historical remnant of the prior rate cases that we have this budget, and then a budget increase, and then a cap after that. So, I think that one of the things we might want to think about is in the next rate case, maybe just taking the highest number and setting that as the budget rather than having three different numbers.

Steed, Shannon

Okay, thank you.

Mickelson, Christopher

Instead of doing the rate case, we could always try to work that as part of the next program year. If everybody agrees, I can't imagine the Commission would be against that.

Yochi Zakai

Yeah, that sounds fine. Those kinds of changes are normally done in a rate case, but you know, if there's consensus to do it outside the rate case, that's fine. I think this is more of a complication in that it just makes reporting a little more complicated on Cascade's end.

Mickelson, Christopher

But I'm also thinking you know the rate case, we wouldn't file one until probably late next year, so you wouldn't get an order until 2024, maybe in time for the 2024 program year. So, thinking ahead, you may not actually get that implemented until late 2024 or 2025. If we can get a consensus on that, then I think it would be a lot easier just to make that as part of our next program you're filing.

Yochi Zakai

Let's hear from other folks. I would be supportive of that. I don't know if there's anybody on the call who would have any concerns about just taking the highest number and using that as our budget.

Note: no one had concerns.

Mickelson, Christopher

Alright, sounds like no concerns all around, so we will get that implemented as part of our next program here.

Steed, Shannon

Thank you everyone. I'm going to turn this over to Byron, who will be filling in for Dan.

b. WEA Small Group update - Dan Tillis

Pfordte, Byron

We'll go through some of the items covered in our last small group meeting, which touches on a lot of the agenda items we have for today. As I'm going through our small group update, I may touch on some of the items under #2 as well, at the same time. The first item we discussed from our last meeting covers

the 25% addition to the WEAFF pledge and that being retroactive for customers back to the beginning of the heating season, October 1st. I think we had a pretty good consensus, making that benefit retroactive and so the question was raised from our small group meeting by Lorena on how we want to handle those retroactive credits. Cascade is willing to apply the credits and provide the agencies with the updated customer data. If that works for everyone, that's how we'll move along with that. Any concerns?

Misty

I wasn't at the last meeting. If you guys are going to do the credit, are you going to contact us to let us know who and how much? Or do we just need to note the file, Shannon?

Steed, Shannon

We want to provide this information to you and however you need to document the files, we would leave up to you. That may be an individual agency decision. Or if you feel like you don't need it, you could just let me know.

Lorena Shah

Yeah, just a little background. Misty. I was thinking about specific certain agencies that maybe have their own databases that they would want to update in that kind of thing. So, I think it is probably an agency-by-agency decision.

Misty

Yeah, I would like to know just to be able to have it, so we can document the files. I think in docuware I put a note page or something in there.

Steed, Shannon

All right, I'll plan to send it to every agency unless I hear from anyone specifically that they don't need it.

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Yochi Zakai

I just want to make sure everyone was on the same page because not everyone was at the small group meeting, so I was just going to provide a little more background. Some of the stakeholders at the last big group meeting made this proposal to increase the pledges by 25% and Cascade agreed to it, at the last small group meeting. So now we're talking about how we would implement that, there are two parts. Increasing the pledge amounts by 25% going forward, and it sounds like is Cascade also going to go back and look at the grants that we're given this program here. So, since October 1st, an increase to those by 25% and then the other part is we had proposed that Cascade agreed to was, increasing the CAP.

Misty

Is there going to be a new calculation form then, going forward?

Pfordte, Byron

That's the next part. So, moving forward, the idea is to simply add a calculation or a formula to the current calculator that takes that amount – what's currently calculated, and it adds 25% to that grant amount.

Misty

Is there going to be a new calculator that is going to do that?

Pfordte, Byron

In a moment, I'll let Chris address that a little bit more, but I just want to learn from all of you if there's any concerns with #1; Cascade applying these grants retroactively and supplying information to the agencies, and then #2; any issues with applying the grants for future grants with the method we're proposing? Keep in mind that all of these would require tariff changes, so I think the next Open Commission meeting is January 12th, and so it would be on the agenda for that meeting. The hope would be that they would, take an approval action on it at that meeting, and we would be able to implement from that point on. Chris - if you want to discuss, you know what that would look like for the calculator. We can knock that out and get through a majority of what's on the agenda item too.

Mickelson, Christopher

Unfortunately, I wasn't at the small WEAF advisory group meeting held earlier this month, so please feel to chime in if I misconstrue anything. The discussion was regarding redoing the calculator, adding in the 80% AMI and then also adding in this additional 25% both to the credit. So, it's going to go from 500 up to 625 and then also to the grant amount. So, the eligibility threshold will vary by county and as part of the AMI piece. However, the benefit curve for the AMI piece will be fixed by the medium county. And so, incorporating this they're probably will be some format issue changes to the calculator, but there will be a new calculator. The goal is to get it out by the end of next month so you could start using it February on. If there is consensus and agreement on the calculator, the 25% applying it to pledges from the start of the program year, then we will get these tariff changes in place, get it filed tomorrow. The next open meeting is tomorrow, but we won't make that one, so the next one is January 12th. We probably won't be doing LSND since the calculator won't be in place, so we'll just let it do the normal 30-day process. I'll just leave it there for right now. Any questions?

Yochi Zakai

No questions. This sounds like a good approach, but obviously if any of the agencies have any specific questions or clarifications it would be good to get those addressed.

3. Update on new program design focusing on agency impacts - *Dan Tillis*

Pfordte, Byron

That covers most of the topics from our last small group meeting and most of the topics under this meeting's agenda for #2. The last topic that was discussed has to do with agenda item 3 for this meeting and the program design for the new Arrearage management and rate discount program, specifically focusing on impacts to the agencies and the items that we discussed during our small group meeting were along the lines of creating rate based or income-based tiers for the program and I believe based on five tier levels. Then, joint administration of the program between the utilities and the Community Action agencies. The big focus there is information sharing between the utility (us) and the agencies so that all programs available to customers that they qualify for, or potentially qualify for, are made known to them and they are given the option to enroll in those. And then enrollment for the arrearage management and rate discount program through self-attestation of income and household size. Obviously, these are the items that still need to be discussed - audits for verification, and that includes percentage of audit and who should handle the audits. And the type of income and the length of

enrollment processing changes for income. Then there are several items that just fall under enrollment use of categorical eligibility and qualifying customers that way. One of the points brought up was just managing overlap between LIHEAP and the bill discount program and developing a plan to maximize use of federal funding so that those funds are put to good use.

So that wraps up what we covered in our small group meeting, and it does lead us into our third topic for this meeting and that is the design of the new program and agency impacts. The first topic is the design of the income-based tiers and originally, we had presented four tiers and the suggestion was to move that to five tiers. If we can have a consensus on those tier levels, that would be a good first step. Chris or Shannon, do you have the original tiers that we presented, you could share?

Steed, Shannon

I do not, but I can see if I can find them.

Yochi Zakai

While we're looking for that and at risk of jumping around a little bit, which I want to apologize for, can I ask if we can get an update on the Department of Commerce? Arrearage funding that I know that they were trying to get out before the end of the year.

DeBell, Michelle (COM)

You're going to have to talk to Brian Sarensen about that, because I don't have any additional news. And if I understand the question, that money for the arrearage funding for the Public Utilities is being handled by the Energy Office. The LIHEAP program's not doing it. So, if you need to have information on that, please contact Brian and he'll get it for you or he'll advise somebody who can.

Yochi Zakai

OK, I just didn't know Cascade had been in contact with them because I think we got an update our last small group meeting about that, and I was thinking it might be nice to share that with the other agencies that weren't at that small group meeting. But if we don't have it, then that can wait until the next time we meet.

Mickelson, Christopher

Can we just get confirmation that everybody was OK with the proposed? For tariff changes, Cascade will file tomorrow. Have we heard from the energy project, or public counsel staff or other agencies?

Lorena Shah

Thanks, good clarifying question. Does the tariff currently also include the minimum we forward, or just the upper limit?

Mickelson, Christopher

It just reflects upper, I don't think there is a minimum.

Yochi Zakai

We just talked about the general contents; did you distribute a draft that I missed?

Mickelson, Christopher

There's no draft. Basically, all that would happen is we add in the 80% AMI language. We've changed the \$500.00 WEAF program grant cap up to \$625. And I might even be able to do the cost change that we talked about at the very beginning and make that set at the \$1.5 million soft cap amount. But no there is no draft yet, I'll be working on that, once we have consensus. – Note- consensus received.

Yochi Zakai

So Lorena asked about the minimum award and apparently there is no minimum awarded. I know that some other utilities do have kind of a minimum award amount and I'm wondering if that's something that we could think about adding. I know this is kind of late, so if it's not appropriate then we can hold off on that, but if it's something that folks are open to and we're making some tariff changes that everybody has consensus about, I'm wondering if we might be able to include a minimum amount.

Mickelson, Christopher

So these are for customers who qualify and get something less than whatever this minimum threshold would be. Is that correct?

Lorena Shah

Yeah, that's correct. So, it's like PSE or even LIHEAP, if somebody's benefit calculation brings them in less than \$200 for LIHEAP, we think it's \$200 or \$250 for PSE, it just rounds to that minimum threshold.

Mickelson, Christopher

That 250 is based off combine utilities, right?

Lorena Shah

No, that's for both combined and electric, only PSE LIHEAP is \$200. I'm not necessarily proposing we go all the way up to \$250, but maybe.

Mickelson, Christopher

Do you know what PSE gas minimum is?

Hockett, Constance

I believe it's \$250 as well.

Lorena Shah

Is it 250 for each? I'm not quite sure.

Pfordte, Byron

We can reach out and see if we can find that. But that would be something you'd need to include in this next filing, right, Chris?

Mickelson, Christopher

Yeah, I would need to include it in the tariff and then it would also have to be something that works into the calculator. So, I'm just kind of concerned about, the timings. Unless we just agree to a minimum now and I'll do my darndest to get it built into the calculator.

Yochi Zakai

Yeah, I mean if you know the average bill amount. It might be worth it for people coming into the office and going through the whole process to get an award. If \$250 feels too high, maybe \$100 would be reasonable.

Pfordte, Byron

\$250 does seem a bit high for just a natural gas customer for me, but... Shannon, do you have any idea like the average benefit that we provide?

Steed, Shannon

No, not off the top of my head. Let me see if I can find something. Give me just a minute.

Pfordte, Byron

OK. I think if we can find a compromise between the average benefit, maybe in an average bill that might be good.

Misty

Back when we originally started, I believe we had a minimum benefit, and if I'm correct, I believe it was \$75.

Mickelson, Christopher

\$75 is what we pay the agencies.

Misty

Yes. And I believe when we originally started way back when, there was a minimum benefit and they made that decision that they didn't want the minimum to be less than what agencies were paid to complete the file, because some of the benefits that we're giving out are like \$18.00 or even less than that, I do remember at one point in time we did have a minimum benefit.

Lorena Shah

I can look that up quick. I have a way.

Marie Stangeland

Yeah, this is Maria. And I think it was \$100, but we always had a minimum up until just this last year, I think or the year before.

Steed, Shannon

Once the calculator came in, the minimums went away because it was the calculator's job to determine what the specific grant amount is. And so that takes away minimums. But if, you know the maximum \$500 is cap is still there, right? Because that's the most someone could get with WEAFF at the time. So, the calculator took care of the minimums. I did find that for the last program year the average WEAFF pledge was \$377.00.

Pfordte, Byron

Yeah, I would suggest. I mean, with inflation rates, it wouldn't be out of the scope of benefits to make that minimum around \$200.

Mickelson, Christopher

I was going to say 20% of what our Max is. I could probably build that in easy if people are OK with that.

Pfordte, Byron

The Max is \$500, correct.

Mickelson, Christopher

It will be \$625.

Pfordte, Byron

Yeah, that's right, with the 25%.

Yochi Zakai

So \$100 or \$125? Does that seem like the right range to everyone?

Pfordte, Byron

I think the upper that, \$125, the 20% would be good.

Hockett, Constance

I think the \$125 would be good.

Lorena Shah

Opportunity Council supports 125.

Pfordte, Byron

And I'm asking this just because I don't know. But if it creates a credit on their account, does that interfere with any other assistance they could potentially receive?

Steed, Shannon

Well, it depends. We have that \$300.00 credit limit and spent EA that's been received in prior program years.

Misty

But that only affects WEAFF, right?

Steed, Shannon

That only affects WEAFF. It does not affect anything like the LIHEAP programs or anything like that.

Mickelson, Christopher

It sounds like we've got consensus, but I don't think I heard from public counsel or staff. Would that override the \$300 credit threshold that can't be created on an account related to WEAFF?

Steed, Shannon

I don't think so, because that threshold is to do with prior program years.

Steed, Shannon

I mean a pledge amount is a pledge amount, whether it's a minimum of \$125 or, like the \$18.00 that someone mentioned the calculators will generate today. So, I don't think that it would.

Sellards, Andrew (UTC)

I don't have an issue with the \$125 amount.

Charlee Thompson

We support the proposed \$125 minimum.

Corey Dahl (PCU-he/him) (Guest)

That makes sense to public counsel.

Mickelson, Christopher

Alright, thank you. I will get that also worked into the tariff revisions and build that into the calculator.

Pfordte, Byron

So Chris was kind enough to put in chat the proposed tier levels. The original proposal which I think we can disregard and focus on these tier levels here. These would change with SMI going away and AMI replacing it.

Yochi Zakai

I think we should think about the benefit curve, how we're going to set the tier levels and I guess I'm curious to know what folks think about using a fixed amount like FPL or what we're going to be doing in the interim here for this program year. Are we using the median county AMI versus having a different benefit curve for each county? I'm curious to think about the benefits and drawbacks of having a separate benefit curve for each county.

Mickelson, Christopher

So I would personally like to get away from the benefit curve if possible, so we don't have to have these 1617 different benefit curves for all the different counties and FPL. It may be better just to go to a set percentage amount for example, if you're zero to 15% AMI, you get 100% or 95% or whatever that amount is. We create a percentage threshold. This is how much you get. You know you get 95% arrearage rate discount, or you get 100% arrears forgiveness for tier one and so on and so forth. Instead of trying to figure out a benefit curve for each of the counties, because then that zero to 15 AMI applies to all the counties, regardless how you fall. So, then it's really your income against your county's AMI.

DeBell, Michelle (COM)

I'd like to say something from the Department of Commerce, and this group can set up the calculation as they feel is best. LIHEAP will not move away in the foreseeable future from federal poverty. I just want everybody to be aware of that. So, you may be comparing apples to bananas here, which is still fruit but, in the future, if you decide to mix those modes, even though this is a private group, it can cause some questions. It's OK. I just want people to know what's going on.

Yochi Zakai

Yeah, I think we acknowledge that there could be different benefit curves and benefit amounts between the different programs. I think that is an acceptable variation.

Yochi Zakai

I guess I'm particularly curious to hear from the agencies. Do we need more time to think about this, which is also OK?

Pfordte, Byron

I'll just reiterate what Yochi said there. You know if there is a need for more time to think about this, that's perfectly fine. We want to get this right, obviously, and keeping in mind the financial situation with inflation and increased rates. We want to make sure that whatever we implement for 2023 in October is going to meet the needs, as best as we can foresee the financial state of a lot of our customers being which makes it a little bit more difficult task to design a program not knowing exactly where our customers are going to be. You know a year and a half from now. So, do we want to think about this for a little bit?

Lorena Shah

Do we anchor the tiers based on the median income of the median income county, or if it's individualized for each county?

Yochi Zakai

Yeah or just based on FPL.

Lorena Shah

Or just based on FPL until we hit that that 200%, then we flow up to 80? Personally, I like that for simplicity's sake.

Yochi Zakai

Yes.

Lorena Shah

I don't think that's what I would prefer, where we're only really dealing with AMI at the very top tier.

Yochi Zakai

So the way Avista did it, is they had their tiers based on FPL. It was an FPL amount as like the lower bounds of the top tier and then the higher bounds of the program were whatever the highest eligibility level was, but they didn't bother to put together a benefit curve for that vary by county. It was just uniform for the whole service area based on based on FPL.

Pfordte, Byron

So just the top tier would take the highest benefit of FPL or AMI, or it just automatically went to AMI?

Charlee Thompson

I can share a screen shot. They have their top tiers 151 FPL to the greater of 200% FPL or 80% AMI. I think we liked that method of keeping with FPL, until hitting that top tier, but open for more discussion.

Mickelson, Christopher

Alright, so tier one through 4 on the proposal that was shown earlier, that's all FPL and then Tier 5 would be the 151 up to 200%, and really, in essence, it's going to be 61 to 80% AMI. Although it sounds like Avista just says up to 80% AMI. Likely that's really kind of the percent range that those customers would fall into.

Yochi Zakai

I just found it and put it in the chat, so this first tier is 0 to 5% and then they give a 94% bill discount and then 6 to 50% FPL. You would get a 75% discount and so on. That top tier is 151 to either 200% FPL or 80% AMI, and then they give the 15% discount there.

Mickelson, Christopher

Alright, so they kind of went with what I was proposing. Where you do an anchored percentage for the tier, OK.

Yochi Zakai

And one thing that I really like about the design that Avista has, obviously they're high discount for the really, low-income folks.

Mickelson, Christopher

Which we also had as per of our initial proposal, so I would say everybody continue to think about it and think about what those tier breaks should be. It looks like a Avista, and Cascade are pretty much the same on tiers. Three from 5. It's really tier one and two where that break should be and then. Even think about what those discounts might be, which may change as we start to create something, to show what would the program cost would be.

Pfordte, Byron

The next topic within the program design is structure. It's in-depth and covers quite a bit, and that's the joint administration between the utilities and Cascade and the agencies. I think top of mind with that is just making sure that customers who enroll in the energy discount program are also being presented with other services that they potentially have or would qualify for. We've shared that with our customer service representatives and most, if not all, of our energy assistance or bill assistance outreach includes information for customers to contact agencies for LIHEAP and other services. I'm open to any

suggestions or ideas on how to cross promote programs and get customers enrolled and exposed to the programs we offer while also making sure they're getting all the assistance they can through the agencies as well.

Yochi Zakai

I think that it's going to take a lot of thought and effort and I don't think in 15 minutes or half an hour we should try to crack this nut completely because it's a big question that you've brought up. But one of the things that I have been thinking about and I wanted to put out there is, I think that as we move to the bill discount rate, we should be tracking the number of customers that are enrolled by the utility and that we are successfully able to hand off to the agencies. Ones where we were able to complete intake at the agencies for evaluation and enrollment in the other programs and services that are offered by the agencies like LIHEAP and weatherization, rental assistance, childcare assistance and all the other things that you know that that the agencies do. I think figuring out a plan to do that is important, and I don't have a fully baked proposal there. But the proposal that I do have that I have, I'm pretty sure I'd like to propose as a good idea would just be to track the number of customers so that we all acknowledge that's a goal that we have for the program, and we can measure our progress towards meeting that goal.

Pfordte, Byron

You're saying in addition to providing, on a regular basis, the exact customer information, but also the quantity so that could measure against what the agencies are enrolling - is that what you're proposing?

Yochi Zakai

So I think the referral process itself will have to include individual customer information, because you're going to say, these people have self-attested that you know they are low income, and you know the utility has enrolled them in the build discount rate, and that would then give the agency the opportunity to follow up with them to further discounts.

Pfordte, Byron

Would that equate to eventually a 100% audit then of who we enroll, since we're providing every customer?

Yochi Zakai

I don't think so, because we can't guarantee that those customers will move forward. I'm proposing to track the number of customers that make it in the door, just because you're providing contact information and perhaps more to the agency doesn't mean that the customers are going to pick up the phone or end up in an intake appointment.

Pfordte, Byron

So just I'm just thinking out loud. If one of those customers outside of the formal audit process is found to not have qualified for any services including our energy discount program at that point, what would be the process? Would it just be a random audit at that point? Would we have to disqualify the customer at that point?

Yochi Zakai

If customer is enrolled by the utility via self-attestation in the bill discount rate, and then later through the CAA process, the agency verifies their income to be in a different tier, at that point we would want to adjust them and put them in the correct tier based on their verified income. And perhaps if they don't income qualify, then they would be unenrolled from the program. But I don't think that we would want to go back and take away any benefits that were provided up until that time. At least that's the way I've been thinking about it. Other people have different ideas and I'm open to hear it.

Pfordte, Byron

Definitely something to consider.

Yochi Zakai

It could work in the customers favor also. Perhaps their self-attested income doesn't include all these

deductions that they get when they go through it with the CAA. Maybe including income, they shouldn't, or should. In a way that they might be eligible for a discount tier that gets them a higher benefit.

Pfordte, Byron

We definitely want to at least get the thought process going. Any other comments or suggestions, ideas around sharing customer information around these programs? If not, I would encourage you to at least think about it, because obviously we want these customers to be able to utilize all the funds available to them and it's important that whatever communication we can provide, is going to be key in getting them to each of these programs. Please do have that in the back of your mind as you're thinking about this program design. This kind of, a little bit off topic, but we currently have the energy discount program in Oregon and have an online form for customers to initiate the process and we collect some information. I am working with security on concerns with collecting that information on our static websites and so just for your information, I am working to get security in place so that we can collect pretty much any information we would need from the customer to qualify them through an online application. My hope is that that would be well in place before October 1st of 2023. I think that would help streamline the process and with that form we can collect demographic information which was one of the topics that was brought up earlier about providing that and sharing that information between the utility and the CAA. So, if we can get that process ironed out, we will be able to collect that information and store it, at least temporarily, and share it.

Yochi Zakai

I would say I don't think that we necessarily need to try to fill up the whole time. If there's anything else you think was worth calling out for further discussion now certainly open to having a little bit more discussion as well. I'm just going to give a pitch to the other Community Action agencies that are on the call about our small group meetings. We have established them to be occurring the 2nd and the 4th week of the month at this time on Wednesday, and then the large advisory group meetings such as this one on the third Wednesday of the month at this time. And we're hoping to get one or two more Community Action agencies reps to join the small group meeting to provide your perspective on how we should design this bill discount rate program, so I would certainly encourage anyone who's interested and might have some time to drop in on those meetings. It would really be great to get some more CAA folks in those discussions where we're really going to dive into a lot of these details. And then I think these larger meetings are kind of intended to be more of a report back about how those discussions are going.

Lorena Shah

Currently it's just me repping you all along with the energy project so, and if you're not able to make the commitment, just feel free to e-mail me, e-mail Yochi at any time with questions or thoughts you have about it so you're a part of that.

Yochi Zakai

If none of the other CAA's decide to step up, then I'm going to have to start calling people because Lorena needs some more support. So, we really need one or two more people to join us

Mickelson, Christopher

Yes, we would love to hear from all our agencies. The action item for everyone for our next time we meet is to think about those tiers and where those thresholds should be and what kind of percentages we should be looking at.

Pfordte, Byron

I do feel like we made some progress today. I appreciate the input. It's extremely valuable and much appreciated, so thank you. Meeting adjourned.

0:0:0.0 --> 0:0:2.10

Steed, Shannon

But you should be able to see here in just a second.

0:0:10.590 --> 0:0:11.860

Steed, Shannon

That available to everybody.

0:0:14.150 --> 0:0:14.920

Charlee Thompson

Looks good.

0:0:14.650 --> 0:0:15.100

Marie Stangeland

Yes.

0:0:16.40 --> 0:0:16.540

Steed, Shannon

Thank you.

0:0:16.570 --> 0:0:16.930

Hockett, Constance

Yes.

0:0:18.20 --> 0:0:21.430

Steed, Shannon

So we will go ahead and begin with our our roll call as we normally do.

0:0:22.400 --> 0:0:26.760

Steed, Shannon

If you could just let me know if you're present, we'll start with Blue Mountain Action Council.

0:0:27.610 --> 0:0:29.760

Estella Avalos

Stella here for Blue Mountain action council.

0:0:30.330 --> 0:0:31.50

Steed, Shannon

Hi Stella.

0:0:32.180 --> 0:0:37.460

Steed, Shannon

Community Action connections. I know Dalia is here. Dalia, is there anyone else with you from your agency?

0:0:38.740 --> 0:0:40.180

401078f8-86c7-463c-b235-1084ab648cc6

No, just me, Shannon.

0:0:40.660 --> 0:0:40.970

Steed, Shannon
OK.

0:0:42.400 --> 0:0:50.930

Steed, Shannon
So Dale and Sandy, let me know that they are closing early today. So they're not with us. How about coastal Community Action program?

0:0:56.180 --> 0:0:58.470

Steed, Shannon
Joanne Douglas, Community Action Council.

0:0:59.130 --> 0:0:59.680

Vern Gurnard (Guest)
Yes.

0:1:1.380 --> 0:1:2.260

Steed, Shannon
I is that Vern?

0:1:2.630 --> 0:1:3.320

Vern Gurnard (Guest)
Yeah, it is.

0:1:3.920 --> 0:1:4.650

Steed, Shannon
I think spurn.

0:1:5.290 --> 0:1:6.850

Steed, Shannon
Kitsap Community resources.

0:1:11.810 --> 0:1:13.710

Steed, Shannon
Lower Columbia Community Action Center.

0:1:18.720 --> 0:1:20.560

Steed, Shannon
Northwest Community Action Center.

0:1:22.800 --> 0:1:24.930

Jose Alvarez (NCAC)
Uh Jose Alvarez here for CAC.

0:1:25.590 --> 0:1:26.230

Steed, Shannon
Hi, Jose.

0:1:27.410 --> 0:1:28.520

Steed, Shannon

Oh, I see of Washington.

0:1:33.430 --> 0:1:36.850

Steed, Shannon

And opportunity council. I know Marie is here. Anyone else?

0:1:43.300 --> 0:1:44.810

Steed, Shannon

Reaction of Skagit County.

0:1:47.970 --> 0:1:49.260

Misty

That's me, Shannon.

0:1:50.430 --> 0:1:50.980

Misty

Misty.

0:1:55.460 --> 0:1:56.280

Hockett, Constance

Yes.

0:1:50.720 --> 0:1:56.430

Steed, Shannon

Almost funny. Thanks so much, county Human Services. Constance did. Is anyone else you?

0:1:57.200 --> 0:1:59.230

Hockett, Constance

Sarah is here with me. Sarah Haskell.

0:1:59.830 --> 0:2:0.900

Steed, Shannon

OK. Thanks Sarah.

0:2:1.910 --> 0:2:3.410

Steed, Shannon

Uh WTC staff?

0:2:8.180 --> 0:2:13.150

Navarro, Hanna (UTC)

This is Hanna Navarro. I'm here. And a couple other colleagues are here as well.

0:2:14.140 --> 0:2:14.350

Steed, Shannon

Thanks.

0:2:13.770 --> 0:2:15.920

Roberts, Andrew (UTC)

The this is Andrew Roberts. I'm here.

0:2:15.710 --> 0:2:17.880

Sellards, Andrew (UTC)

And this is Andy Sellards from staff.

0:2:20.210 --> 0:2:22.50

Steed, Shannon

Thank you all the energy project.

0:2:22.990 --> 0:2:26.610

Ross Quigley

Yeah, this is Ross Quigley and I'm attending until about 3:00. I have another meeting.

0:2:28.440 --> 0:2:29.170

Steed, Shannon

OK. Thank you.

0:2:29.850 --> 0:2:31.980

Yochi Zakai

Good afternoon. Yokosuka is here as well.

0:2:32.680 --> 0:2:33.630

Steed, Shannon

I OK. Thank you.

0:2:34.320 --> 0:2:35.90

Steed, Shannon

Public counsel.

0:2:37.890 --> 0:2:39.730

Corey Dahl (PCU-he/him) (Guest)

Yes, this is Corey doll. I'm on the line.

0:2:40.500 --> 0:2:42.900

Steed, Shannon

Agree Northwest Energy coalition.

0:2:44.10 --> 0:2:45.340

Charlee Thompson

Hi, this is Charlie Thompson.

0:2:46.120 --> 0:2:46.670

Steed, Shannon

I, Charlie.

0:2:47.350 --> 0:2:48.460

Steed, Shannon
Our Department of Commerce.

0:2:52.170 --> 0:2:53.670

DeBell, Michelle (COM)
Michelle De Bell is here.

0:2:54.360 --> 0:2:55.400

Steed, Shannon
Hi, welcome the shell.

0:2:56.340 --> 0:2:58.790

DeBell, Michelle (COM)
Welcome and Happy New Year everybody.

0:2:59.610 --> 0:3:1.20

Steed, Shannon
Yes, happy New Year to you.

0:3:2.590 --> 0:3:8.220

Steed, Shannon
And for Cascade natural gas, we've had some last minute changes. Uh because of last minute things that have come up.

0:3:8.750 --> 0:3:14.270

Steed, Shannon
Umm, so I know that Dan can't be with us and Lori is not able to join us.

0:3:14.810 --> 0:3:18.900

Steed, Shannon
Um, mark Chiles. I think he's unable to join as well.

0:3:20.400 --> 0:3:21.210

Steed, Shannon
How about Byron?

0:3:22.670 --> 0:3:23.60

Pfordte, Byron
I'm here.

0:3:24.390 --> 0:3:26.300

Steed, Shannon
And Chris is here.

0:3:27.220 --> 0:3:30.100

Steed, Shannon
And Pam is out on vacation, I believe.

0:3:35.100 --> 0:3:35.790

Mickelson, Christopher
That's correct.

0:3:34.980 --> 0:3:35.960

Steed, Shannon
Is there anyone in this?

0:3:36.810 --> 0:3:38.560

Steed, Shannon
Is there anyone whose name I did not call?

0:3:41.500 --> 0:3:44.30

Ortiz, Noemi
Just me and John penalty knowing me or this cascade.

0:3:45.230 --> 0:3:47.80

Steed, Shannon
Oh, I know. Amy, thanks for joining us.

0:3:46.830 --> 0:3:47.380

Ortiz, Noemi
I.

0:3:49.920 --> 0:3:55.850

Steed, Shannon
So we will move ahead with our agenda and I'll go ahead and begin here with our company update.

0:3:56.970 --> 0:4:26.20

Steed, Shannon
And this is just a brief recap of the November WEA report that I sent out by e-mail on December 14th. And if you look here over to the right side of your screen, I've just included this information here and what I provided was just a snapshot of the spending that occurred during November. And so I've included a few images here. The first is just suspending overview of pledges, which again is just a snapshot of the most recent.

0:4:26.160 --> 0:4:53.170

Steed, Shannon
In the previous month and can we can so we can compare that to the previous program years to sort of give us a landmark of where we are in comparison and this can tell us how our program year is progressing. So of course what this just being November, we just have our first two months here and we're happy to see that we've had a an increase in pledge spending between October and November and a nice increase compared to November of last year as well.

0:4:53.900 --> 0:5:23.750

Steed, Shannon
And I've also included our program year budget. We have 3 tiers for our program year, which is our base of 1.2 million. And then we also have our 15% budget increase built in at 1.4. And then we have an

additional 5% soft cap as well, which takes us up to 1.5 million. And you'll notice that these three tiers are the same over the last three program years. And this is because of a rate case from.

0:5:23.890 --> 0:5:44.390

Steed, Shannon

At 2016, which created a 5 year plan for us and the 2021 program year capped out that five year plan for the budget and we have carried that same budget over for the previous two for the current year and the previous program year as well. So the spending limits have not changed.

0:5:46.480 --> 0:5:59.30

Steed, Shannon

And then I've also included a little granular data here as far as the agency totals for the month, just to show us the different activity that's going on between our agency partners throughout our service territory.

0:6:0.870 --> 0:6:13.520

Steed, Shannon

And then the last bit of information I have is the updated budget totals, which takes us down to the screen down here. And this just tells us how much is available for each tier of the budget level.

0:6:14.990 --> 0:6:21.800

Steed, Shannon

So we have a long way to go and we have 1.3 million left available to our final 5% soft cap for the program year.

0:6:23.0 --> 0:6:25.90

Steed, Shannon

Any questions about that before we move on?

0:6:30.840 --> 0:7:1.30

Yochi Zakai

Hey, Shannon, this is Yoki. With the energy project, no questions. Thank you for sharing. I would just note that you know, I know it's kind of a historical remnant of the prior rate cases that we have this budget and then a budget increase and then a CAP after that. And so I think that one of the things we might wanna think about is in the next great case, maybe just taking the highest number and setting that as the budget rather than having three different numbers.

0:7:1.580 --> 0:7:2.10

Steed, Shannon

OK.

0:7:3.0 --> 0:7:3.920

Steed, Shannon

All right. Thank you.

0:7:5.210 --> 0:7:6.680

Steed, Shannon

Any other comments or questions?

0:7:11.330 --> 0:7:20.350

Mickelson, Christopher

So Yoki the Chris Mickelson instead of maybe doing the rate case, we could always try to work that as part of the next.

0:7:21.80 --> 0:7:27.240

Mickelson, Christopher

Program year and uh. If everybody agrees, I I would can't imagine the Commission would be against that.

0:7:47.360 --> 0:7:47.840

Mickelson, Christopher

It does.

0:7:30.830 --> 0:7:48.520

Yochi Zakai

Yeah, that sounds fine. Good. Those kinds of changes are normally done in a rate case, but you know, there's consensus to do it outside the rate case. That's fine. Again, I think this is more of a complication in that it just makes reporting a little more complicated on Cascades end. So, yeah, if everybody.

0:7:50.100 --> 0:7:50.590

Yochi Zakai

Yeah.

0:7:49.920 --> 0:8:17.130

Mickelson, Christopher

But I'm also thinking you know the rate case, we wouldn't file one until probably late next year, so you wouldn't get an order till 2024, maybe in time for the 2024 program year. So I'm just kind of thinking ahead like you may not actually get that implemented until 2020, late 2024 or 2025. So if we can get consensus on that, then I think it would be a lot easier just to.

0:8:18.280 --> 0:8:20.990

Mickelson, Christopher

Make that as part of our next program you're filing.

0:8:23.320 --> 0:8:34.170

Yochi Zakai

Yeah. Well, let's hear from other folks. I tap tap would be supportive of that. I don't know if there's anybody on the call who would have any concerns about just taking the highest number and using that as our budget.

0:8:37.890 --> 0:8:39.640

Charlee Thompson

I don't think anyone has any concerns.

0:8:47.40 --> 0:8:47.830

Mickelson, Christopher

Public counsel.

0:8:52.120 --> 0:8:53.170

Corey Dahl (PCU-he/him) (Guest)
That sounds fine to me.

0:8:56.140 --> 0:8:57.400

Mickelson, Christopher
UTC staff.

0:8:59.600 --> 0:9:1.470

Navarro, Hanna (UTC)
Yeah, that that's OK with.

0:9:3.140 --> 0:9:4.390

Navarro, Hanna (UTC)
With me.

0:9:10.880 --> 0:9:12.590

Mickelson, Christopher
Any of the agencies or?

0:9:24.170 --> 0:9:26.580

Lorena Shah
This Lorena know concern from our agency.

0:9:35.180 --> 0:9:37.150

Misty
This misty no concern it's gadget.

0:9:39.920 --> 0:9:42.940

Alan Walker, CDCAC (Guest)
Alan Walker, no concern from Chelan Douglas Community Action Council.

0:9:47.230 --> 0:9:47.540

Hockett, Constance
You know.

0:9:46.730 --> 0:9:52.340

Mickelson, Christopher
And I see a few people wrote in the chat saying no concerns. So sorry, it's.

0:9:51.550 --> 0:9:57.180

Hockett, Constance
No concerns from Snohomish County Energy assistance, as far as I could see.

0:10:4.510 --> 0:10:9.220

Mickelson, Christopher
Alright, sounds like no concerns all around, so we will.

0:10:11.550 --> 0:10:14.180

Mickelson, Christopher

Get that implemented as part of our next program here.

0:10:17.700 --> 0:10:18.810

Mickelson, Christopher

Shannon, back to you.

0:10:20.260 --> 0:10:28.810

Steed, Shannon

Thank you everyone. So if there are no further questions, I'm going to turn this over to Byron, who will be filling in for Dan.

0:10:30.440 --> 0:10:42.340

Pfordte, Byron

Thanks, Shannon. Yeah, we'll go through some of the items covered in the small group in our last small group meeting, which probably by no surprise touches on a lot of the agenda items we have for today.

0:10:43.580 --> 0:11:2.900

Pfordte, Byron

Under Item 2 and so since I'm covering those as well, we may just as I'm going through our small group update, I may touch on some of the items under #2 there. At the same time and try to kill two birds with one stone. The first item we discussed from our last meeting was actually it covers.

0:11:4.300 --> 0:11:21.330

Pfordte, Byron

The 25% addition to the WEAf pledge and and that being retroactive for customers back to the beginning of the heating season October 1st and and Cascade and I think we had a pretty good consensus that that.

0:11:23.510 --> 0:11:26.490

Pfordte, Byron

Making that benefit retroactive.

0:11:26.570 --> 0:11:27.990

Pfordte, Byron

From was.

0:11:29.530 --> 0:11:30.720

Pfordte, Byron

The way to go and so.

0:11:32.140 --> 0:11:55.50

Pfordte, Byron

The question was raised from our small group meeting by Lorena on on how we want to handle those retroactive credits and cascade is willing to to apply the credits and provide the agencies with the updated customer data. And so if that works for everyone, if there's no objections to that, then that's how we'll we'll move along with that. Any concerns with with taking that route.

0:11:57.390 --> 0:12:1.920

Misty

So this is Skagit, I just have a quick question. I wasn't at the last meeting but.

0:12:3.850 --> 0:12:13.350

Misty

So if you guys are gonna do the credit, you're gonna contact, you're gonna let us know who and how much. Do we just need to note the file, Shannon, is that all you want us to do?

0:12:17.610 --> 0:12:24.200

Steed, Shannon

Well, we wanted, we want to provide this information to you and however you need to document the files. Of course, we would leave up to you.

0:12:26.630 --> 0:12:28.640

Steed, Shannon

That may be an individual agency decision.

0:12:29.650 --> 0:12:32.140

Steed, Shannon

Or if you feel like you don't need it, you could just let me know.

0:12:34.700 --> 0:12:46.140

Lorena Shah

Yeah, just a little background. Misty. I was thinking about specific certain agencies that maybe have their own databases that they would want to update in that kind of thing. So I think it is probably an agency by agency decision.

0:12:50.150 --> 0:12:59.360

Misty

Yeah, I I would like to know just to be able to have it so we can and and I would just document the files I think in docuware I put a note page or something in there.

0:13:0.40 --> 0:13:0.960

Misty

That we have so.

0:13:1.720 --> 0:13:2.50

Misty

OK.

0:13:3.910 --> 0:13:9.270

Steed, Shannon

All right, I'll plan to send it to every agency unless I hear from anyone specifically that they don't need it.

0:13:13.20 --> 0:13:17.290

Pfordte, Byron

Or did you or I'm sorry. Yochi. Did you pop up because you had comment?

0:13:17.920 --> 0:13:47.780

Yochi Zakai

Ohh yeah, I just wanted to make sure everyone was on the same page because not everyone was at the small group meeting, so I was just going to provide a little more background and say that you know the some of the stakeholders that the last big group meeting made this proposal to increase the pledges by 25% and Cascade agreed to it at the last small group meeting. So now we're talking about how we would implement that and the two parts of it would be.

0:13:47.970 --> 0:14:18.560

Yochi Zakai

Alright, you know, increasing the pledge amounts by 25% going forward, what we're talking about now, it sounds like is cascades also gonna go back and look at the grants that we're given this program here. So since October 1st, an increase those by 25% and then the other part of it that we had proposed that Cascade agreed to was increasing the the CAP on.

0:14:18.640 --> 0:14:22.830

Yochi Zakai

The the highest grant amount by 25% as well.

0:14:23.890 --> 0:14:24.690

Misty

So you.

0:14:23.990 --> 0:14:29.210

Pfordte, Byron

Yeah, you're getting a little me ahead of me there. I was. I was getting that. But. But thank you. Yeah, that leads to.

0:14:29.550 --> 0:14:32.700

Pfordte, Byron

Umm, the next point, but I think somebody else had a comment there.

0:14:32.950 --> 0:14:36.750

Misty

Well, I my question is, is there going to be a new calculation form then?

0:14:37.790 --> 0:14:39.290

Misty

If we're going forward.

0:14:41.390 --> 0:14:41.780

Misty

Sorry.

0:14:37.960 --> 0:14:56.20

Pfordte, Byron

Well, yeah, and that's that's the next part. So moving forward, the the idea is to simply add a calculation

or a formula to the current calculator that takes that amount. So what's currently calculated and just adds 25% to that grant amount.

0:14:58.150 --> 0:14:58.980

Pfordte, Byron

Does that make sense?

0:15:1.150 --> 0:15:2.190

Pfordte, Byron

Any questions about that?

0:15:2.870 --> 0:15:10.410

Misty

It it makes sense, it's just it's is there going to be a new calculator that is gonna come out to do that?

0:15:11.500 --> 0:15:13.320

Misty

Automatically. OK.

0:15:11.160 --> 0:15:22.770

Mickelson, Christopher

Yes. And that's the next discussion item I'll talk about. So if you would hold your question until after that discussion and if I don't answer then.

0:15:23.50 --> 0:15:24.980

Mickelson, Christopher

Have ask your questions then.

0:15:26.120 --> 0:15:27.950

Pfordte, Byron

And we'll if if.

0:15:29.10 --> 0:15:58.560

Pfordte, Byron

In a moment, I'll let Chris adjust that or address that a little bit more, but I I just want to learn from you all. If there's if there's any concerns with #1 cascade applying these grants retroactively supplying information to the agencies and then #2 any issues with applying the grants for future grants with the method we're proposing and and all that. Keep in mind that all of these would require tariff changes, so.

0:15:59.440 --> 0:16:15.570

Pfordte, Byron

If I have the, I think the next Open Commission meeting is January 12th and so it would be on the agenda for that meeting and the hope would be that they would, you know, take an approval action on it at that meeting and we would be able to implement from that point on. But.

0:16:15.980 --> 0:16:27.880

Pfordte, Byron

Um, Chris, actually, if you if you want to discuss, you know what that would look like for the calculator.

Now we can we can knock that out and and and get through a majority of what's on the agenda item too if you want.

0:16:28.540 --> 0:16:30.270

Mickelson, Christopher

Sure. So.

0:16:31.670 --> 0:16:44.670

Mickelson, Christopher

Unfortunately, I wasn't at the small WEAFA advisory group meeting held earlier this month, so please feel free Yoki public counsel others to chime in if I.

0:16:45.770 --> 0:16:49.330

Mickelson, Christopher

Misconstrue anything? Uh, but basically, uh.

0:16:50.320 --> 0:16:51.400

Mickelson, Christopher

There was talk about.

0:16:53.10 --> 0:17:8.840

Mickelson, Christopher

Redoing the calculator, adding in the 80% AMI and then also adding in this additional 25% both to the credit, so it's gonna go from 500 up to 6:25 and then also to the grant amount that.

0:17:9.950 --> 0:17:11.560

Mickelson, Christopher

Previous applied to others.

0:17:12.540 --> 0:17:38.290

Mickelson, Christopher

And so the eligibility threshold will vary by county and as part of the AMI piece. However, the benefit curve for the AMI piece will be fixed by the medium county. And so incorporating this they're probably will be some format issue changes to the calculator, but there will be a new calculator. The goal is to get it out.

0:17:39.780 --> 0:17:44.630

Mickelson, Christopher

That by the end of next month so you could start using it February on.

0:17:45.910 --> 0:17:46.860

Mickelson, Christopher

Kind of that next.

0:17:47.900 --> 0:17:50.640

Mickelson, Christopher

A topic where it's what 2A?

0:17:51.520 --> 0:18:4.630

Mickelson, Christopher

Or it looks like, uh, if there is consensus and agreement on kind of everything we talking about the calculator, the 25% applying it to pledges that.

0:18:6.280 --> 0:18:18.650

Mickelson, Christopher

From the start of the program year, then we will get these tariff changes in place, get it filed tomorrow with the goal to it looks like the next open meeting will be.

0:18:21.410 --> 0:18:37.570

Mickelson, Christopher

Think there's one tomorrow, but we won't make that one the next one. That this would be available is for the January 12th. We actually probably won't be doing LSND since the calculator won't be in place, so we'll actually just let it do the normal 30 day process.

0:18:38.510 --> 0:18:39.250

Mickelson, Christopher

Umm.

0:18:40.60 --> 0:18:42.950

Mickelson, Christopher

I'll. I'll just leave it there for right now. Any questions?

0:18:58.40 --> 0:19:10.300

Yochi Zakai

Thanks, Chris. No questions. I'll just say like I did in the e-mail that generally this sounds like a good approach, but obviously if any of the agencies have any specific questions or clarifications would be good to get those addressed.

0:19:17.500 --> 0:19:18.890

Pfordte, Byron

Any any questions about that?

0:19:20.810 --> 0:19:21.530

Pfordte, Byron

Before we move on.

0:19:24.370 --> 0:19:25.720

Pfordte, Byron

No. OK.

0:19:26.280 --> 0:19:26.700

Pfordte, Byron

Umm.

0:19:27.820 --> 0:19:38.510

Pfordte, Byron

The that covers the majority of the topics from our last small group meeting and a majority of the topics under this meeting's agenda for #2.

0:19:39.10 --> 0:19:46.820

Pfordte, Byron

Umm, the the last topic that was discussed actually has to do with agenda item 3 for this meeting and it's the.

0:19:48.630 --> 0:19:50.540

Pfordte, Byron

Program design for.

0:19:52.120 --> 0:20:5.300

Pfordte, Byron

For the new Arrearage management and rate discount program and and specifically focusing on impacts to the agencies and the items that we discussed during our small group meeting.

0:20:6.530 --> 0:20:16.410

Pfordte, Byron

Were along the lines of creating a rate base or income based tiers for the program and I believe based on on five tier levels.

0:20:16.890 --> 0:20:24.20

Pfordte, Byron

Umm. And then joint administration of the program between the utilities and the Community Action agencies.

0:20:25.700 --> 0:20:44.410

Pfordte, Byron

And and the big focus there is is information sharing between the utility US and and the agencies. So that all programs available to customers that they qualify for potentially qualify for our are made known to them and and they are given the option to enroll in those.

0:20:45.870 --> 0:20:54.170

Pfordte, Byron

And then enrollment for the arrearage management and rate discount program through self attestation of income and household size.

0:20:56.150 --> 0:21:10.830

Pfordte, Byron

Yeah, obviously these are the items that that still need to to be discussed and and hammered out, but audits for verification and that includes you know percentage of audit, who who should handle the audits.

0:21:12.520 --> 0:21:25.350

Pfordte, Byron

Type of income and the length of enrollment processing changes for income. And then there's several items that just.

0:21:26.310 --> 0:21:30.560

Pfordte, Byron

Fall under enrollment use of categorical eligibility and.

0:21:32.830 --> 0:21:34.400

Pfordte, Byron

And qualifying customers that way.

0:21:36.550 --> 0:21:37.230

Pfordte, Byron

Let's see.

0:21:41.930 --> 0:21:56.520

Pfordte, Byron

And then one of the points brought up was just managing overlap between LIHEAP and the build discount program, developing a plan to maximize use of of federal funding so that those funds are are put to good use.

0:21:57.360 --> 0:22:15.970

Pfordte, Byron

So that that wraps up what we covered in our small group meeting and it and it does lead us into our third topic for this meeting and and that is the design of of the new program and and as I said specifically agency impacts.

0:22:16.620 --> 0:22:20.930

Pfordte, Byron

Um from this design and and so I mean if.

0:22:26.220 --> 0:22:26.720

Pfordte, Byron

If.

0:22:27.600 --> 0:22:31.30

Pfordte, Byron

If it makes sense to everyone else, I think probably the the best.

0:22:32.550 --> 0:22:33.860

Pfordte, Byron

Place to start is with.

0:22:35.10 --> 0:22:50.560

Pfordte, Byron

The the first topic and that is the design of the income income based tiers and originally we had presented and Chris you can correct me if I'm wrong, but I believe it was four tiers and the suggestion was to move that to five tiers.

0:22:52.310 --> 0:22:56.70

Pfordte, Byron

And and I forget exactly how those were broken broken up, but.

0:22:58.670 --> 0:23:1.950

Pfordte, Byron

I think if you know if we can come to some.

0:23:2.610 --> 0:23:7.60

Pfordte, Byron

Consensus on on those tier levels that would be a good first step.

0:23:10.370 --> 0:23:13.180

Pfordte, Byron

Do you have Chris or Shannon, do you have?

0:23:13.900 --> 0:23:14.650

Pfordte, Byron

The.

0:23:15.740 --> 0:23:19.460

Pfordte, Byron

Original tears that that we presented in handy that you could share.

0:23:25.990 --> 0:23:27.700

Steed, Shannon

I do not, but I can see if I can find them.

0:23:33.20 --> 0:23:51.420

Yochi Zakai

While we're looking for that and at risk of jumping around a little bit, which I wanna apologize for, can I ask you know and maybe we could save this till the end if we don't want to deal with it now, but could we also just get an update on the Department of Commerce?

0:23:51.500 --> 0:23:56.480

Yochi Zakai

Umm Arrearage funding that I know that they were trying to get out.

0:23:57.830 --> 0:23:59.240

Yochi Zakai

Uh, before the end of the year.

0:24:0.770 --> 0:24:5.730

DeBell, Michelle (COM)

You're gonna have to talk to Brian Sarensen about that, because I don't have any additional news.

0:24:8.140 --> 0:24:17.890

DeBell, Michelle (COM)

And if I understand the question, that money for the ARREARAGE funding for the Public Utilities is being handled by the Energy Office.

0:24:19.110 --> 0:24:21.290

DeBell, Michelle (COM)

My heap, the LIHEAP program's not doing it.

0:24:23.850 --> 0:24:24.160

Yochi Zakai

I.

0:24:24.10 --> 0:24:33.110

DeBell, Michelle (COM)

So if you need to have information on that, please contact Brian and he'll he'll get it for you or he'll wrap you to somebody who can.

0:24:35.550 --> 0:24:51.560

Yochi Zakai

OK, I just didn't know Cascade had had been in contact with them because I think we got an updated our last small group meeting about that and I was just thinking it might be nice to share that with the other with the agencies that weren't at that small group meeting as well.

0:25:2.810 --> 0:25:3.200

DeBell, Michelle (COM)

OK.

0:24:56.690 --> 0:25:3.550

Yochi Zakai

But if we don't have it, then that can wait until the next time we meet. So that's fine as well. Just wanted to bring it up.

0:25:7.810 --> 0:25:12.490

Pfordte, Byron

Make it Chris supplied the tier levels for this. I'm gonna. I'm gonna share my screen here and.

0:25:15.950 --> 0:25:22.410

Pfordte, Byron

Or at least this portion of it and and it's in the chat as well. If you all want to. Would prefer to look at it that way.

0:25:32.180 --> 0:25:35.120

Pfordte, Byron

Bear with me here. Just a moment. I got too many windows open.

0:25:38.570 --> 0:25:44.360

Pfordte, Byron

Ohh great, I'm just going to share my teams window and I don't think I've got anything in there confidential.

0:25:49.650 --> 0:25:59.640

Mickelson, Christopher

While we're waiting on that, can we just get confirmation that everybody was OK with the proposed?
Oh, we've tariff changes, that Cascade will.

0:26:0.530 --> 0:26:1.430

Mickelson, Christopher
File tomorrow.

0:26:2.690 --> 0:26:4.360

Mickelson, Christopher
Have we heard from?

0:26:5.650 --> 0:26:9.500

Mickelson, Christopher
The energy project so public counsel staff others.

0:26:10.160 --> 0:26:11.50

Mickelson, Christopher
If you could chime in.

0:26:11.820 --> 0:26:12.650

Mickelson, Christopher
And agencies.

0:26:16.850 --> 0:26:24.630

Lorena Shah
Thanks, good clarifying question. Does the tariff currently also include the minimum we forward?

0:26:28.310 --> 0:26:30.440

Lorena Shah
Or just the upper limit.

0:26:31.900 --> 0:26:35.500

Mickelson, Christopher
It just reflects 8 upper. I don't think there is a minimum.

0:26:36.120 --> 0:26:36.890

Lorena Shah
OK. Thanks.

0:26:41.440 --> 0:26:42.40

Pfordte, Byron
If I make this.

0:26:43.190 --> 0:26:43.830

Yochi Zakai
Proceed.

0:26:43.40 --> 0:26:44.570

Corey Dahl (PCU-he/him) (Guest)
And just to clarify the.

0:26:45.540 --> 0:26:46.0

Corey Dahl (PCU-he/him) (Guest)
Go ahead.

0:26:47.980 --> 0:26:59.600

Yochi Zakai

Ohh, I just gonna ask Chris, we we just talked about the general, the, the, the general contents, you didn't distribute a draft that I missed, did you because I didn't see a draft.

0:27:0.330 --> 0:27:12.720

Mickelson, Christopher

Correct. There's no draft. Basically all would happen is we add in the 80% AMI language. We've changed the \$500.00 WEAF.

0:27:14.250 --> 0:27:18.570

Mickelson, Christopher

Program grant cap up to 625.

0:27:20.710 --> 0:27:24.460

Mickelson, Christopher

And I might even be able to do even the program.

0:27:27.110 --> 0:27:29.980

Mickelson, Christopher

Cost change that we talked about at the very beginning.

0:27:30.900 --> 0:27:35.610

Mickelson, Christopher

And just make that set at the 1.5 million soft cap amount.

0:27:40.360 --> 0:27:46.450

Mickelson, Christopher

But no, they're they're there is not a draft yet. I'll be working on that once we have consensus.

0:27:49.20 --> 0:27:49.540

Yochi Zakai

Thanks.

0:27:49.110 --> 0:27:53.190

Corey Dahl (PCU-he/him) (Guest)

Yeah, the the tariff changes discussed that.

0:27:54.510 --> 0:27:56.460

Corey Dahl (PCU-he/him) (Guest)

No, we're just discussed or?

0:27:57.190 --> 0:27:58.500

Corey Dahl (PCU-he/him) (Guest)

Are suitable to public counsel.

0:28:3.120 --> 0:28:7.910

Charlee Thompson

This is Charlie with the Northwest Energy coalition. They're also fine with NYC. Thanks.

0:28:12.280 --> 0:28:15.410

Navarro, Hanna (UTC)

Umm yeah, those those are also good with staff.

0:28:19.740 --> 0:28:28.110

Hockett, Constance

This is Constance with Snohomish County Energy assistance. Unfortunately, my supervisor is off today. Excuse.

0:28:29.680 --> 0:28:33.330

Hockett, Constance

But I don't foresee any issues. From what I understand.

0:28:44.10 --> 0:28:45.330

Mickelson, Christopher

Alright. Well thank you everyone.

0:28:47.530 --> 0:28:52.190

Yochi Zakai

So Lorena asked about the the minimum award.

0:28:53.650 --> 0:29:6.470

Yochi Zakai

And apparently there is no minimum awarded as what is what I heard. And I know that some other utilities do have kind of a minimum award amount.

0:29:7.750 --> 0:29:19.120

Yochi Zakai

And I'm wondering if that's something that we could think about adding. I know this is kind of late, so if it's not appropriate then you know, maybe we can.

0:29:20.140 --> 0:29:32.800

Yochi Zakai

You know, we can hold off on that, but if it's something that folks are open to and we're making some tariff changes that everybody has consensus about, I'm wondering if we might be able to include.

0:29:33.800 --> 0:29:52.170

Yochi Zakai

A minimum amount as well because it seems like if we're giving out awards that are less than \$100 sometimes, maybe that's not the best use of of everyone's time. And we could maybe up it to to amount that's a little bit more significant.

0:29:54.440 --> 0:29:58.150

Mickelson, Christopher

So these are for customers who qualify.

0:29:59.130 --> 0:29:59.770

Mickelson, Christopher
But.

0:30:1.250 --> 0:30:5.310

Mickelson, Christopher
Get something less than whatever this minimum threshold would be. Is that correct?

0:30:8.410 --> 0:30:26.80

Lorena Shah

Yeah, that's correct. So it's like PSE or even LIHEAP, if somebody's calculation, you know, their benefit calculation brings them in less than two, if it's 200 for LIHEAP, we think it's 2 or 250 for PSE help it then just rounds that benefit up to to that minimum threshold.

0:30:27.520 --> 0:30:29.770

Lorena Shah

We have we have one, at least the.

0:30:28.620 --> 0:30:32.270

Mickelson, Christopher

That two 50s based off combine utilities, right?

0:30:33.980 --> 0:30:42.30

Lorena Shah

No, that that's for both combined and electric only PSE LIHEAP's 200. I'm not necessarily proposing we go all the way up to 250.

0:30:43.190 --> 0:30:44.240

Lorena Shah

But maybe.

0:30:43.210 --> 0:30:46.310

Mickelson, Christopher

Do you know what PSE gas minimum is?

0:30:49.960 --> 0:30:50.380

Lorena Shah

I.

0:30:51.310 --> 0:30:52.240

Lorena Shah

I'm not here.

0:30:51.360 --> 0:30:53.190

Hockett, Constance

I believe it's 250 as well.

0:30:54.140 --> 0:30:54.560

Hockett, Constance
Isn't it?

0:30:54.10 --> 0:30:57.640

Lorena Shah
Is it 250 for each? I'm not quite sure how the the the.

0:30:57.550 --> 0:30:58.90

Hockett, Constance
Umm.

0:30:58.540 --> 0:31:0.930

Lorena Shah
For benefits when it's both our.

0:31:2.450 --> 0:31:5.420

Lorena Shah
Nobody on the call is because we're all CNG weave.

0:31:8.820 --> 0:31:11.60

Lorena Shah
Yeah, which I don't have that answer handy.

0:31:13.10 --> 0:31:16.60

Pfordte, Byron
We can reach out and and see if we can find that.

0:31:17.520 --> 0:31:21.830

Pfordte, Byron
But that was that would be something you'd need to include in this next filing, right, Chris?

0:31:22.320 --> 0:31:30.900

Mickelson, Christopher
Yeah, I would need to include it in the tariff and then it would also have to be something that works into the calculator. So I'm I'm just kind of concerned about.

0:31:31.570 --> 0:31:32.380

Mickelson, Christopher
Those timings.

0:31:34.600 --> 0:31:37.670

Mickelson, Christopher
Unless we just agree to a minimum now and.

0:31:38.520 --> 0:31:41.310

Mickelson, Christopher
I'll do my darndest to get it built into the calculator.

0:31:44.680 --> 0:31:46.80

Yochi Zakai
Yeah, I mean it.

0:31:47.790 --> 0:31:48.450

Yochi Zakai
And we will.

0:31:49.490 --> 0:31:50.960

Yochi Zakai
Think about the.

0:31:52.100 --> 0:31:54.890

Yochi Zakai
You know the average bill amount and.

0:31:56.180 --> 0:32:5.850

Yochi Zakai
And what might be worth it for people coming into the office and going through the whole, you know, the whole process to get an award, you know?

0:32:6.630 --> 0:32:12.440

Yochi Zakai
If 250 feels feels too high, you know, maybe maybe \$100 would be reasonable.

0:32:15.310 --> 0:32:24.190

Pfordte, Byron
250 does seem a bit high for just a natural gas customer for me, but I don't. Shannon, do you have any idea like the average benefit?

0:32:25.50 --> 0:32:26.390

Pfordte, Byron
That we provide.

0:32:28.950 --> 0:32:30.620

Steed, Shannon
No, not off the top of my head.

0:32:31.310 --> 0:32:32.460

Steed, Shannon
I can let.

0:32:31.680 --> 0:32:34.20

Pfordte, Byron
So I don't throwing a lot of curve balls at you right now, yeah.

0:32:34.190 --> 0:32:37.230

Steed, Shannon
That's OK, that's alright. Keeps me on my toes.

0:32:37.620 --> 0:32:42.120

Steed, Shannon

Umm, let me see if I can find something. Wanna give me just a minute.

0:32:42.640 --> 0:32:44.690

Pfordte, Byron

OK. Yeah. I think if we can.

0:32:46.330 --> 0:32:46.940

Mickelson, Christopher

So.

0:32:46.150 --> 0:32:51.500

Pfordte, Byron

Find a compromise between the average benefit, maybe in an average bill that might be good.

0:32:52.720 --> 0:32:52.980

Mickelson, Christopher

Would.

0:32:52.240 --> 0:32:58.130

Misty

I I have a question. This is misty from Skagit. Back when we originally started with.

0:32:58.810 --> 0:33:1.540

Misty

I believe we had a minimum benefit.

0:33:2.190 --> 0:33:5.330

Misty

And if I'm correct, I believe it was \$75.

0:33:8.780 --> 0:33:11.430

Mickelson, Christopher

Have 75 is what we pay the agencies.

0:33:11.700 --> 0:33:28.60

Misty

Yes. And I believe when we originally started we way back when it originally started, there was a minimum benefit and they they made that decision that they didn't want the minimum to be less than what agencies were paid to complete the file.

0:33:33.510 --> 0:33:35.170

Misty

Because because.

0:33:36.530 --> 0:33:37.0

Misty

Yeah.

0:33:37.680 --> 0:33:38.460

Misty

Because some.

0:33:33.540 --> 0:33:39.730

Mickelson, Christopher

Unfortunately, I can't speak to that. I wasn't here at that time without going back and look at tariffs.

0:33:40.120 --> 0:33:44.180

Misty

Some of the benefits that we're giving out are like.

0:33:44.860 --> 0:33:46.440

Misty

\$18.00 benefits.

0:33:50.780 --> 0:33:58.870

Misty

Or even less than that. And and I think I've and Marie was here when I when we started. That too, but.

0:34:0.160 --> 0:34:11.640

Misty

It might have been \$100. It might have been a 5th 75 to \$100 minimum benefit. I just, I don't remember the exact minimum, but I do remember at one point in time we did have a minimum benefit.

0:34:18.630 --> 0:34:21.120

Lorena Shah

I can look that up really quick. I have a way.

0:34:15.290 --> 0:34:21.880

Steed, Shannon

You know, Misty, I'm trying to think back and I just. It's ringing a bell, but I just didn't recall because it was so long ago.

0:34:22.790 --> 0:34:23.420

Misty

Yeah.

0:34:23.400 --> 0:34:23.630

Lorena Shah

Like.

0:34:23.30 --> 0:34:26.520

Marie Stangeland

Yeah, this is Maria. And I think it was \$100, but.

0:34:27.600 --> 0:34:33.350

Marie Stangeland

And we always had a minimum up until just the last this last year, I think or the year before.

0:34:34.770 --> 0:34:53.810

Steed, Shannon

No, like once the calculator came in, the minimums went away because it was the calculator's job to determine what the minimum, you know, what the specific grant amount is. And so that takes away minimums. But it, you know, the the maximum 500 is cap is still there, right? Because that's the most someone could get with WEAFF at the time.

0:34:54.370 --> 0:34:57.550

Steed, Shannon

Umm, so the calculator took care of the minimums.

0:35:0.70 --> 0:35:7.840

Steed, Shannon

I can't. I did find that for the last program, you're the average we've pledge was \$377.00.

0:35:12.380 --> 0:35:18.80

Pfordte, Byron

Yeah, I would suggest. I mean, with inflation rates everything, I mean, it wouldn't be out of.

0:35:19.440 --> 0:35:19.890

Pfordte, Byron

Umm.

0:35:21.280 --> 0:35:26.150

Pfordte, Byron

The the scope of of benefits to maybe make that minimum around 200.

0:35:28.770 --> 0:35:30.470

Pfordte, Byron

Maybe one 5200.

0:35:28.940 --> 0:35:33.50

Mickelson, Christopher

I I was gonna say 20% of what our Max is.

0:35:34.960 --> 0:35:38.500

Mickelson, Christopher

I could probably build that in fairly easy if people are OK with that.

0:35:43.380 --> 0:35:44.930

Pfordte, Byron

The Max is 500, correct.

0:35:45.870 --> 0:35:47.560

Mickelson, Christopher

It will be 625.

0:35:48.940 --> 0:35:49.740

Mickelson, Christopher
So I think.

0:35:49.150 --> 0:35:50.980

Yochi Zakai
So that would be 125.

0:35:49.50 --> 0:35:51.20

Pfordte, Byron
Yeah, that's right. With the with the 25%.

0:35:51.400 --> 0:35:52.40

Mickelson, Christopher
Exactly.

0:35:54.980 --> 0:36:4.570

Yochi Zakai
Yeah. So how do we feel? So 100 or 125 or the two numbers that have been thrown out? Does that seem like the right range to everyone?

0:36:5.770 --> 0:36:9.780

Pfordte, Byron
I think the upper bounds of that, the 1:25, yeah, the 20% would be good.

0:36:10.590 --> 0:36:21.650

Hockett, Constance
I think the 1:25 would be good. I think. I mean, we have a minimum, but because of like been all that. But yeah, I think 125 would be great.

0:36:30.400 --> 0:36:31.560

Lorena Shah
Opportunity council.

0:36:30.170 --> 0:36:32.80

Mickelson, Christopher
Public counsel staff.

0:36:33.670 --> 0:36:36.60

Lorena Shah
Because they opportunity Council supports 125.

0:36:37.390 --> 0:36:44.850

Pfordte, Byron
And I'm asking this going just because I don't know. But you know, if it creates a credit on their account, does that interfere with any other assistance?

0:36:47.470 --> 0:36:48.990

Pfordte, Byron

That they could potentially receive.

0:36:55.280 --> 0:36:55.580

Pfordte, Byron

No.

0:36:57.340 --> 0:36:59.70

Steed, Shannon

Well, it depends on how well.

0:37:0.30 --> 0:37:2.220

Steed, Shannon

We have that \$300.00 credit limit.

0:37:3.420 --> 0:37:6.650

Steed, Shannon

And spent EA, that's been received in prior program years.

0:37:7.590 --> 0:37:8.140

Steed, Shannon

Umm.

0:37:8.650 --> 0:37:10.380

Misty

But that only affects WEA, right?

0:37:11.30 --> 0:37:17.840

Steed, Shannon

That only affects WEA. It does not affect anything like like the LIHEAP programs or or anything like that.

0:37:19.130 --> 0:37:19.460

Pfordte, Byron

OK.

0:37:24.630 --> 0:37:35.650

Mickelson, Christopher

So that brings me to 1 aspect of this Hern 25 minimum. It sounds like we've got consensus, so though I don't think I heard from public counsel or staff.

0:37:38.530 --> 0:37:38.830

Corey Dahl (PCU-he/him) (Guest)

And.

0:37:36.710 --> 0:37:41.260

Mickelson, Christopher

Uh, would that override the \$300?

0:37:42.550 --> 0:37:46.740

Mickelson, Christopher

Credit threshold that can't be created on an account related to WEAFF.

0:37:50.830 --> 0:37:54.210

Steed, Shannon

I don't think so, because that threshold is to do with prior program years.

0:38:2.790 --> 0:38:6.480

Mickelson, Christopher

Gotcha. Yeah. Yep. Yep. Yep. Yeah, so.

0:37:55.40 --> 0:38:6.500

Steed, Shannon

I mean a pledge, a pledge amount is a pledge amount, whether it's a minimum of 125 or, you know, like the \$18.00 that someone mentioned. The calculators will generate today. So I don't think that it would.

0:38:11.60 --> 0:38:14.740

Sellards, Andrew (UTC)

Yeah, there. And he's all item staff. I don't have an issue with the 1:25 amount.

0:38:18.500 --> 0:38:22.150

Charlee Thompson

This is Charlie from Enwik uh. We support the proposed 125 minimum.

0:38:25.10 --> 0:38:30.780

Corey Dahl (PCU-he/him) (Guest)

That makes sense to public counsel. Sorry I didn't try been earlier. I'm trying to multitask and unsuccessfully.

0:38:37.500 --> 0:38:41.750

Mickelson, Christopher

Alright, thank you. I will get that also worked into.

0:38:42.660 --> 0:38:46.720

Mickelson, Christopher

The tariff revisions and build that into the calculator.

0:38:49.720 --> 0:38:50.990

Pfordte, Byron

Look at that progress.

0:38:52.20 --> 0:38:52.520

Pfordte, Byron

Yay.

0:39:0.50 --> 0:39:0.590

Pfordte, Byron

OK.

0:39:7.910 --> 0:39:8.550

Pfordte, Byron
Yeah.

0:39:0.180 --> 0:39:11.530

Mickelson, Christopher
Byron, I think you're still showing your screen, but we no longer see the tears, which I think was the topic you want to see. If people wanna set for the next meeting.

0:39:13.140 --> 0:39:17.680

Pfordte, Byron
Yeah, I got tired of staring at it. So I I hit it for a bit. There we go.

0:39:22.230 --> 0:39:25.360

Pfordte, Byron
So Chris was kind enough to.

0:39:26.690 --> 0:39:30.450

Pfordte, Byron
Put in a again, I think it's in chat here for everybody to see.

0:39:31.570 --> 0:39:33.740

Pfordte, Byron
The proposed tier levels.

0:39:34.980 --> 0:39:36.530

Pfordte, Byron
The original proposal which?

0:39:37.930 --> 0:39:40.320

Pfordte, Byron
I think we can disregard.

0:39:41.560 --> 0:39:44.710

Pfordte, Byron
And and focus on these tier levels here.

0:39:47.50 --> 0:39:50.670

Pfordte, Byron
And these would change correct Chris with.

0:39:51.700 --> 0:39:56.990

Pfordte, Byron
SMI going away and and AMI replacing it, is that correct?

0:39:57.340 --> 0:39:58.530

Mickelson, Christopher
Yeah, sorry.

0:39:59.10 --> 0:39:59.290

Pfordte, Byron
Yeah.

0:40:7.30 --> 0:40:7.890

Pfordte, Byron
No, that's fine.

0:39:59.710 --> 0:40:8.350

Mickelson, Christopher
And I think that's what I meant to do on my second one through 5 tiers of, but I was going too quick.
Yes, that's supposed to be AMI.

0:40:9.90 --> 0:40:9.450

Pfordte, Byron
OK.

0:40:13.160 --> 0:40:13.800

Pfordte, Byron
Any.

0:40:14.670 --> 0:40:16.200

Pfordte, Byron
Questions or comments?

0:40:20.440 --> 0:40:20.950

Yochi Zakai
I guess.

0:40:20.200 --> 0:40:22.210

Pfordte, Byron
About the YOUR levels presented here.

0:40:22.880 --> 0:40:48.540

Yochi Zakai
Yeah, I think like one of the threshold decisions that I think we should think about is you know the you know the the benefit curve, right, how we're gonna set the tier levels and I guess I'm curious, you know what folks think about using, you know a fixed amount like?

0:40:49.920 --> 0:41:8.490

Yochi Zakai
FPL or what we're gonna be doing in the interim here for this we've program year is kind of using the median county AMI versus having a different benefit curve for each county.

0:41:10.990 --> 0:41:22.750

Yochi Zakai
You know I and and and I guess I'm curious to think about the benefits and drawbacks of having an independent, you know, having a separate benefit curve for for each county and not.

0:41:24.220 --> 0:41:51.60

Mickelson, Christopher

So I I would personally like to get away from the benefit curve if possible so we don't have to kind of have these 1617 different benefit curves for all the different counties and FPL it may be better just to go to a set percentage amount like for example, if you're zero to 15% AMI, you get 100% or 95% or whatever that amount is we just.

0:41:51.920 --> 0:41:52.420

Mickelson, Christopher

Create.

0:41:53.300 --> 0:42:13.900

Mickelson, Christopher

A percentage threshold. This is how much you get. You know you get 95% error G rate discount or you get 100% arrears forgiveness for tier one and so on and so forth. Instead of trying to figure out a benefit curve for each of the counties, because then that zero to 15 AMI.

0:42:14.650 --> 0:42:15.480

Mickelson, Christopher

Applies.

0:42:16.350 --> 0:42:18.520

Mickelson, Christopher

To all the counties, regardless how.

0:42:19.960 --> 0:42:27.320

Mickelson, Christopher

You fall. So then it's really your income against your your particular counties AMI.

0:42:28.250 --> 0:42:29.180

Mickelson, Christopher

If that makes sense.

0:42:33.950 --> 0:42:34.190

Mickelson, Christopher

Sure.

0:42:30.530 --> 0:42:35.600

DeBell, Michelle (COM)

It does, but I'd like to say something from the Department of Commerce.

0:42:36.600 --> 0:42:38.120

DeBell, Michelle (COM)

And this group can.

0:42:39.40 --> 0:42:49.790

DeBell, Michelle (COM)

Set up the calculation as they feel is best. LIHEAP will not move away in the foreseeable future from federal poverty. Double.

0:42:50.750 --> 0:42:53.60

DeBell, Michelle (COM)

I just want everybody to be aware of that.

0:42:54.330 --> 0:42:59.880

DeBell, Michelle (COM)

OK, so you may be comparing apples to bananas here, which still fruit.

0:43:1.110 --> 0:43:11.240

DeBell, Michelle (COM)

But in the future, if you decide to mix those modes, even though this is a private group, it can cause some questions. It's OK. I just want people to know what's going on.

0:43:14.680 --> 0:43:15.960

DeBell, Michelle (COM)

And I hope that makes sense.

0:43:20.750 --> 0:43:21.240

DeBell, Michelle (COM)

OK.

0:43:23.380 --> 0:43:23.810

DeBell, Michelle (COM)

All right.

0:43:27.10 --> 0:43:27.670

DeBell, Michelle (COM)

OK.

0:43:17.740 --> 0:43:30.210

Yochi Zakai

Yeah, I think we we we acknowledge that there could be different benefit curves and benefit amounts between the different programs. I think that is an acceptable variation.

0:43:31.90 --> 0:43:31.950

DeBell, Michelle (COM)

Okie doke.

0:43:33.30 --> 0:43:33.410

DeBell, Michelle (COM)

Thank you.

0:43:42.700 --> 0:43:43.140

Yochi Zakai

Umm.

0:43:43.910 --> 0:44:11.300

Yochi Zakai

I guess I'm. I'm particularly curious to hear from, you know, the agencies, you know to, you know,

curious, you know, do you think that, you know, having a benefit curve for each individual county in the in the build discount rate is something that you know might be beneficial? Do we need more time to think about this, which is also an OK question or an OK response or you know is using?

0:44:11.380 --> 0:44:17.820

Yochi Zakai

Ohm, you know a single benefit curve statewide, something that's probably OK.

0:44:39.320 --> 0:44:42.200

Pfordte, Byron

I'll just reiterate what Yochi said there. You know there's.

0:44:43.180 --> 0:44:46.730

Pfordte, Byron

You know if there is a need for more time to.

0:44:48.150 --> 0:44:52.940

Pfordte, Byron

Think about this. You know, that's perfectly we want to get this right, obviously and.

0:44:54.100 --> 0:45:2.90

Pfordte, Byron

You know, keeping in mind the financial situation with inflation and rates and things like that.

0:45:2.930 --> 0:45:7.80

Pfordte, Byron

You know, we want to make sure that whatever we implement for our.

0:45:7.940 --> 0:45:21.820

Pfordte, Byron

2023 in October is going to meet the needs you know, as as, as best as we can foresee the the financial state of a lot of our customers being and then and so that I mean.

0:45:22.750 --> 0:45:24.940

Pfordte, Byron

Keeping that in mind, you know we're going to have to.

0:45:25.800 --> 0:45:32.690

Pfordte, Byron

Kind of consult a crystal ball here a little bit, I think, and make sure that that what we set up is is.

0:45:33.800 --> 0:45:34.530

Pfordte, Byron

Is going to meet.

0:45:35.700 --> 0:45:36.550

Pfordte, Byron

Potentially.

0:45:38.140 --> 0:45:42.610

Pfordte, Byron

The the financial situation of our customers at that you know a year from now or two years from now even.

0:45:43.770 --> 0:45:44.840

Pfordte, Byron

Which makes it a little bit.

0:45:46.400 --> 0:45:48.490

Pfordte, Byron

Of of a more difficult task.

0:45:50.260 --> 0:45:50.590

Pfordte, Byron

To.

0:45:51.770 --> 0:45:56.470

Pfordte, Byron

Design a program not knowing exactly where our customers are going to be. You know a year and a half.

0:45:57.210 --> 0:45:57.680

Pfordte, Byron

From now.

0:46:2.500 --> 0:46:4.80

Pfordte, Byron

So do we want to kind of?

0:46:5.100 --> 0:46:23.810

Pfordte, Byron

Think about this for a little bit. The proposed tier levels, as I said, are in the chat, so you can consult those whenever you need. And I think we've we've had them. I think it was in our last PowerPoint presentation we presented and and again keep in mind that the SMI should be AMI in this table here, but.

0:46:26.30 --> 0:46:27.690

Pfordte, Byron

Do we want to payable this?

0:46:28.380 --> 0:46:29.920

Pfordte, Byron

For, for, for now.

0:46:32.30 --> 0:46:33.250

Pfordte, Byron

Or any questions about it?

0:46:35.320 --> 0:46:46.670

Lorena Shah

I think what might be helpful least it would be for me is to run both scenarios with some just to kind of see it a little bit differently. Like if somebody.

0:46:48.710 --> 0:46:52.60

Lorena Shah

Just trying to think, just think through here. One of my asking for.

0:46:54.120 --> 0:47:7.690

Lorena Shah

The question is whether we anchor the tiers based on the median income of the median income county, or if it's individualized for each county.

0:47:9.370 --> 0:47:10.320

Lorena Shah

I think I'm.

0:47:12.470 --> 0:47:13.460

Lorena Shah

Don't please.

0:47:9.600 --> 0:47:16.690

Yochi Zakai

Yeah. And I think the other sorry to cut you off, Lorena. The other the IT could be or or it could just be based on FPL.

0:47:18.330 --> 0:47:23.480

Lorena Shah

Or just based on FPL until we hit that that 200%, then we flow up to.

0:47:24.450 --> 0:47:24.900

Lorena Shah

80.

0:47:25.790 --> 0:47:29.310

Lorena Shah

Personally, I like that I think for simplicity sake.

0:47:33.370 --> 0:47:33.970

Yochi Zakai

Yes.

0:47:31.170 --> 0:47:36.560

Lorena Shah

I don't think that's what I would prefer, where we're only really dealing with AMI at the very top tier.

0:47:37.260 --> 0:47:50.650

Yochi Zakai

Yeah. So the way the way Avista did it is they had their tiers based on Ohdc FPL only and then the only difference was what the top threshold was. So the.

0:47:50.800 --> 0:48:6.510

Yochi Zakai

That I should be able to find it on my desk somewhere. What the what? The top of this. The tier was, but basically, you know, it was an FPL amount as like the lower bounds of the top tier and then the higher bounds of the program was.

0:48:6.790 --> 0:48:23.280

Yochi Zakai

You know what? Whatever the highest eligibility level was, but they didn't bother to put together a, you know, a benefit curve for that vary by county. It was just uniform for the whole service area based on based on FPL.

0:48:24.690 --> 0:48:24.870

Lorena Shah

Yeah.

0:48:24.430 --> 0:48:31.30

Pfordte, Byron

So just the top tier would take the highest benefit of FPL or AMI or it just automatically went to AMI?

0:48:34.490 --> 0:48:38.620

Yochi Zakai

Let me let me see if I can find it and share it to explain.

0:48:37.390 --> 0:48:39.420

Charlee Thompson

I have it. I have it pulled up.

0:48:39.960 --> 0:48:40.590

Yochi Zakai

You do.

0:48:40.240 --> 0:48:49.990

Charlee Thompson

Umm yeah. And I can share a screen shot. They have their top tiers 151 FPL to the greater of 200% FPL or 80% AMI.

0:48:52.520 --> 0:48:53.670

Charlee Thompson

And I think that was also.

0:48:55.390 --> 0:49:2.880

Charlee Thompson

Talking with others at end like we we, I think we liked that that method of keeping with FPL until that hitting that top tier.

0:49:3.800 --> 0:49:5.140

Charlee Thompson
But open for more discussion.

0:49:6.180 --> 0:49:7.560

Yochi Zakai
And do you know the?

0:49:6.680 --> 0:49:12.910

Mickelson, Christopher
Alright, so so. Ohh sorry. Didn't mean to cut off so tier one through 4 on the proposal that.

0:49:14.360 --> 0:49:15.550

Mickelson, Christopher
Prime was shown earlier.

0:49:16.270 --> 0:49:18.380

Mickelson, Christopher
Our Byron was showing earlier. Uh.

0:49:19.120 --> 0:49:41.40

Mickelson, Christopher
That's all FPL and then Tier 5 would be the 151 up to 200% and really in essence it's gonna be 61 to 80% AMI. Although it sounds like Vista just says up to 80% AMI in all likelihood that's really kind of the percent range that those customers would fall into.

0:49:43.150 --> 0:49:43.700

Mickelson, Christopher
OK.

0:49:47.370 --> 0:50:13.860

Yochi Zakai
I just found it and put it in the chat, so this this first tier is 0 to 5% and then they give a 94% bill discount and then 6 to 50% FPL. You would get a 75% discount and so on. And then that top tier is 151 to either 200% FPL or 80% AMI and then they give the the 15% discount there.

0:50:15.610 --> 0:50:22.800

Mickelson, Christopher
Alright, so they did kind of go with what I was proposing. Where you do a anchored percentage for the tier, OK.

0:50:27.860 --> 0:50:38.700

Yochi Zakai
And one thing that I I really like about the design that Avista have again is that you know, obviously they're really high discount for the you know, really, really low income folks.

0:50:43.40 --> 0:50:46.450

Mickelson, Christopher
Which we also had as per of our initial proposal, so.

0:50:47.90 --> 0:50:47.340

Pfordte, Byron
Umm.

0:51:0.330 --> 0:51:13.660

Mickelson, Christopher
Alright, well I I would say everybody continue to think about it and think about what those tier breaks should be. It looks like a Vista and cascade are pretty much the same on tiers.

0:51:14.470 --> 0:51:15.800

Mickelson, Christopher
Three form 5.

0:51:16.500 --> 0:51:21.520

Mickelson, Christopher
It's really tier one and two where that break should be and then.

0:51:22.650 --> 0:51:26.500

Mickelson, Christopher
Even think about what those discounts might be, which.

0:51:27.670 --> 0:51:30.480

Mickelson, Christopher
That may change as we start to, you know, kind of.

0:51:32.410 --> 0:51:38.330

Mickelson, Christopher
Create something to show you know what would what would the program cost be as we.

0:51:39.70 --> 0:51:45.170

Mickelson, Christopher
Do this kind of structure and that may also start to change people's minds too. So.

0:51:58.240 --> 0:51:58.730

Pfordte, Byron
Umm.

0:52:1.390 --> 0:52:2.380

Pfordte, Byron
Moving on.

0:52:4.310 --> 0:52:5.60

Pfordte, Byron
Be.

0:52:10.30 --> 0:52:14.840

Pfordte, Byron
The next kind of the next topic within the the program design is structure.

0:52:16.30 --> 0:52:25.810

Pfordte, Byron

There's a pretty indepth covers, quite a bit, and that's, you know, the joint administration between the utilities and and the OR between cascade and and the agencies and.

0:52:26.440 --> 0:52:28.660

Pfordte, Byron

Umm and that's you know.

0:52:29.670 --> 0:52:34.370

Pfordte, Byron

I think top of mind with that is just making sure that customers who enroll in the energy discount program are also.

0:52:35.280 --> 0:52:36.490

Pfordte, Byron

Being presented with.

0:52:37.800 --> 0:52:39.250

Pfordte, Byron

Other services that.

0:52:40.610 --> 0:52:45.940

Pfordte, Byron

They potentially have or would qualify for and.

0:52:50.750 --> 0:52:51.650

Pfordte, Byron

Yeah, we've.

0:52:52.780 --> 0:52:56.990

Pfordte, Byron

Shared that our our customer service representatives and and.

0:52:58.150 --> 0:52:59.600

Pfordte, Byron

I would say all of.

0:53:1.680 --> 0:53:6.270

Pfordte, Byron

Most to all, if not all of our uh energy assistance or bill assistance.

0:53:7.430 --> 0:53:9.320

Pfordte, Byron

Outreach includes information.

0:53:10.20 --> 0:53:19.590

Pfordte, Byron

Uh for customers to contact agencies for LIHEAP and and other services, and so I beyond that.

0:53:22.370 --> 0:53:31.380

Pfordte, Byron

I'm I'm open to any suggestions or ideas for kind of how to cross promote programs and get customers.

0:53:33.900 --> 0:53:38.30

Pfordte, Byron

Enrolled and exposed to the programs we offer while also.

0:53:39.210 --> 0:53:44.240

Pfordte, Byron

Making sure they're they're getting all of the assistance they can through the agencies as well.

0:53:57.280 --> 0:54:29.390

Yochi Zakai

Yeah. Thanks, Byron. So I have to say, you know, I think that it's gonna take a lot of thought and effort and I don't think in 15 minutes or half an hour we should try to crack this nut completely because it's a, it's a big, it's a big question that, that, that you've brought up. But one of the things that I have been thinking about that I wanted to put out there is that I think that as we move to the build discount rate.

0:54:29.590 --> 0:55:0.760

Yochi Zakai

That we should be tracking the number of customers that are enrolled by the utility and that we are successfully able to hand off to the agencies and are able to complete, you know, intake at the agencies for evaluation and enrollment in the other programs and services that are offered by the agencies like.

0:55:0.960 --> 0:55:31.670

Yochi Zakai

Liheap and weatherization and rental assistance and childcare assistance and all the other things that you know that that the agencies do, and so you know, I think figuring out a plan to do that is important, and I don't have a fully baked proposal there. But the proposal that I do have that I have, I'm pretty sure I'd like to propose as a good idea would just be.

0:55:31.830 --> 0:55:42.320

Yochi Zakai

To track the number of customers so that we all acknowledge that that's a goal that we have for the program and we can measure our progress towards meeting that goal.

0:55:44.640 --> 0:55:57.10

Pfordte, Byron

We're saying not not providing on a regular basis the exact customer information, but just the quantity so that that could be measured against what the agencies are enrolling because that is what you're proposing.

0:55:58.530 --> 0:56:29.60

Yochi Zakai

So I think the referral process itself will have to include individual customer information, yeah, because you're going to say, hey, these people have self attested that you know they are low income and you

know the utility is enrolled them in the build discount rate and that would then give the agency the opportunity to follow up with them to say hey, you know we know.

0:56:29.180 --> 0:56:39.960

Yochi Zakai

You know, they you believe your income qualified and therefore you know, you're probably eligible for, you know, this other suite of programs that we have to offer that could really help you out.

0:56:40.630 --> 0:56:42.540

Pfordte, Byron

Would that equate to?

0:56:42.610 --> 0:56:47.990

Pfordte, Byron

You ohdc eventually a 100% audit then of who we enroll.

0:56:49.430 --> 0:56:50.580

Pfordte, Byron

Since we're providing.

0:56:51.720 --> 0:57:20.670

Yochi Zakai

I don't, I don't think so, because we can't guarantee that those customers will actually, again, when I'm proposing to track is the number of customers that actually make it in the door, right, just because you're providing contact information and perhaps more to the agency doesn't mean that the customers actually gonna, you know, pick up the phone or end up in an intake appointment.

0:57:23.760 --> 0:57:39.750

Pfordte, Byron

So just I'm just thinking out loud. If if one of those customers outside of the formal audit process is found to not have qualified for any services including our energy discount program at that point.

0:57:41.670 --> 0:57:44.840

Pfordte, Byron

What? Uh, what would be the process, would we?

0:57:46.810 --> 0:57:52.820

Pfordte, Byron

Would we just, I mean it could. It is supposed to be a random audit at that point. So I don't know.

0:57:54.300 --> 0:57:56.70

Yochi Zakai

Yeah. So I think if.

0:57:54.630 --> 0:57:56.770

Pfordte, Byron

Would we have to disqualify the customer at that point?

0:57:57.780 --> 0:58:28.630

Yochi Zakai

Yeah. So if customer is enrolled by the utility via self attestation in the bill discount rate, and then at a later time through the CAA process, you know the agency you know verifies their income to be, let's say, in a different tier, I think, you know at that point we would wanna adjust them and put them in the correct tier based on their verified income. But I don't think we would want to.

0:58:43.660 --> 0:58:44.40

Pfordte, Byron

Yeah.

0:58:28.750 --> 0:58:45.630

Yochi Zakai

And perhaps if they don't income qualify at all, then they would be unenrolled from you know, the program. But I don't think that we would wanna go back and take away any benefits that were provided up until that time.

0:58:49.780 --> 0:58:50.270

Pfordte, Byron

Yeah, that's.

0:58:52.430 --> 0:58:53.380

Pfordte, Byron

Yeah, that's.

0:58:49.500 --> 0:58:55.140

Yochi Zakai

At least that's the way I've been thinking about it. So you know, other people have different ideas. Open to hear it.

0:58:57.120 --> 0:58:58.390

Pfordte, Byron

Definitely something to.

0:58:59.460 --> 0:59:0.230

Pfordte, Byron

Consider.

0:59:7.190 --> 0:59:8.210

Pfordte, Byron

Underground apartment.

0:59:2.50 --> 0:59:17.760

Yochi Zakai

And you know, it could work in in the customers favor also right. Perhaps their self attested income doesn't include all of these deductions that you know when they go through it with the CAA, they're like, oh, well, you shouldn't count.

0:59:18.790 --> 0:59:33.210

Yochi Zakai

You know this income for for a certain reason or you missed, you know, someone who was staying with you that should have been a member of your household or something like that. You know that that changes, that changes their income.

0:59:34.730 --> 0:59:41.730

Yochi Zakai

In in a way that they might be eligible for, you know, a a discount tier that gets them a higher benefit.

0:59:48.50 --> 1:0:1.30

Pfordte, Byron

Yeah. And I'm not looking when I when I present these topics, I'm not looking for any of these to be resolved in in 30 minutes, but definitely want at least to get the thought process going. And so this is good, yeah.

1:0:2.90 --> 1:0:6.580

Pfordte, Byron

Any other comments or suggestions, ideas around?

1:0:8.840 --> 1:0:11.50

Pfordte, Byron

I guess sharing customer information around these programs.

1:0:19.850 --> 1:0:41.290

Pfordte, Byron

If not, I would like I said I would encourage you to at least think about it, because obviously we want these customers to be able to utilize all the funds available to them and and it's important that whatever communication we can provide, however, we can provide it is going to be key in and getting them to each of these programs so.

1:0:43.560 --> 1:0:50.720

Pfordte, Byron

Please do have have that you know in the back of your mind as you're thinking about these this program design.

1:0:51.570 --> 1:0:52.160

Pfordte, Byron

Umm.

1:0:54.850 --> 1:1:20.260

Pfordte, Byron

And I will say, uh, this kind of is a little bit off topic, but we so we currently have the energy discount program in Oregon and and have a online form for customers to initiate the process and we collect some information. I am working with. There are security concerns with collecting that information on us on our static websites and so.

1:1:20.640 --> 1:1:21.200

Pfordte, Byron
Umm.

1:1:22.160 --> 1:1:26.110

Pfordte, Byron
Just for your information, I am working so to get.

1:1:28.130 --> 1:1:30.380

Pfordte, Byron
Security in place so that we can collect.

1:1:32.60 --> 1:1:50.990

Pfordte, Byron
Pretty much any information we would need from the customer to qualify them through an online application and so it would be my hope is that that would be well in place before October 1st of of 2023. So I think that would.

1:1:52.970 --> 1:2:3.990

Pfordte, Byron
Help help streamline the process and and and with that form we can collect you know demographic information which was one of the topics that.

1:2:5.260 --> 1:2:16.700

Pfordte, Byron
Was brought up earlier about providing that and sharing that information between the utility and the CAA. So if we can, if we can get that process ironed out or when we do, we will get it ironed out.

1:2:18.20 --> 1:2:24.670

Pfordte, Byron
We will be able to collect that information and store it and at least temporarily, and share it. So just an update on that.

1:2:25.310 --> 1:2:25.980

Pfordte, Byron
Uh.

1:2:28.20 --> 1:2:30.10

Pfordte, Byron
Which time do we have left here? About 25 minutes.

1:2:31.630 --> 1:2:56.520

Yochi Zakai
Yeah, I don't. I I would say I don't think that we necessarily need to try to fill up the whole time if we don't have stuff. I'm, I'm, I'm I personally would be OK ending a little bit early. So yeah, I'll leave it, leave it up to you though, if there's anything else you think was worth calling out for further discussion now certainly open to having a little bit more discussion as well.

1:2:57.80 --> 1:3:9.520

Pfordte, Byron

Yeah. No, I can certainly use another twenty 1520 minutes back of my day, that's for sure. There's a lot of lot of fires going on right now, but I let me just peruse this list, make sure there's anything that.

1:3:9.600 --> 1:3:12.950

Pfordte, Byron

The doesn't need to be addressed at this time.

1:3:15.220 --> 1:3:15.850

Pfordte, Byron

And understand.

1:3:14.780 --> 1:3:43.410

Yochi Zakai

And and while you're doing that I I'm, I'm just going to give a pitch to the other Community Action agencies that are on the call about our small group meetings. So we have established them to be occurring at this time. I believe on the second and third weeks of the month on Wednesday, Wednesday afternoons at this time. And then we're gonna have the large group.

1:3:44.750 --> 1:3:45.800

Yochi Zakai

On the 4th.

1:3:47.540 --> 1:3:48.130

Yochi Zakai

Uh.

1:3:49.50 --> 1:4:17.280

Yochi Zakai

Is that no. So the small group is going to be the 2nd and the 4th week of the month at this time on Wednesday, and then the large advisory group meetings such as this one are gonna be on the third Wednesday of the month at this time. And we're hoping to get one or two more Community Action agencies reps to join the small group meeting to provide your perspective on.

1:4:18.220 --> 1:4:24.890

Yochi Zakai

You know how we should design this bill discount rate program and so tap would certainly encourage.

1:4:25.10 --> 1:4:49.150

Yochi Zakai

Uh, you know anyone who's interested in might have some time to drop in on on somewhere. All of those meetings to join us cuz it would really be great to get some more CAA folks in those discussions where we're really going to dive into a lot of these details. And then I think these larger meetings are kind of intended to be more of a report back about how those discussions are going.

1:4:52.390 --> 1:5:7.880

Lorena Shah

Currently it's just me wrapping you all along with the energy projects so, and if you're not able to make the commitment, just feel free to e-mail me, e-mail Yoki at any time with questions or thoughts you have about it, so you're part of that.

1:5:11.860 --> 1:5:20.450

Pfordte, Byron

I don't have anything else. I do want to open it though to Shannon and Chris to see if they have anything else before we adjourn for the day.

1:5:21.430 --> 1:5:22.320

Pfordte, Byron

Jenn and Chris.

1:5:21.650 --> 1:5:41.320

Yochi Zakai

And I just say, yeah, thanks. But before you run off to that next topic and see what they have, I would just say if none of the other CPA's decide to step up, then I'm gonna have to start calling people because Lorena, Lorena, needs some more support. So we really need one or two more people to join us. So if no one steps up, expect a phone call from me soon.

1:5:50.530 --> 1:5:51.370

Pfordte, Byron

There's for sure.

1:5:50.140 --> 1:5:52.890

Mickelson, Christopher

Yes, we would love to hear from all our agencies, so.

1:5:53.790 --> 1:5:54.600

Mickelson, Christopher

Highly recommended.

1:5:55.780 --> 1:6:8.890

Mickelson, Christopher

No, nothing here. Like I said, just kind of action item for everyone for our next time we meet is think about those tiers and where those thresholds should be and what kind of percentages we should be looking at.

1:6:12.930 --> 1:6:13.790

Steed, Shannon

Nothing else from me.

1:6:16.650 --> 1:6:18.320

Pfordte, Byron

Anything from anyone else?

1:6:24.510 --> 1:6:29.420

Pfordte, Byron

Well, I do want to wish everybody a happy holidays and Merry Christmas and happy New Year.

1:6:30.640 --> 1:6:34.650

Pfordte, Byron

I appreciate you taking your time so close to the holidays and I.

1:6:35.410 --> 1:6:46.660

Pfordte, Byron

I do feel like we made some progress today. I and I appreciate the input. It's extremely valuable and and much appreciated. So thank you. And if there's no other questions or comments, we'll end the meeting for today.

1:6:48.780 --> 1:6:49.250

Pfordte, Byron

Thank you.

1:6:48.310 --> 1:6:49.500

Mickelson, Christopher

Stay warm, everyone.

1:6:50.560 --> 1:6:51.410

Steed, Shannon

Thanks everybody.

1:6:50.840 --> 1:6:51.420

Navarro, Hanna (UTC)

Thanks.

1:6:51.140 --> 1:6:52.700

Hockett, Constance

Thank you. Happy holidays.

1:6:51.120 --> 1:6:54.470

Charlee Thompson

Thanks so much. Bye. Hello. Happy holidays.

1:6:53.550 --> 1:6:54.800

Yochi Zakai

Thanks everyone. Bye.

1:6:53.330 --> 1:6:55.610

Corey Dahl (PCU-he/him) (Guest)

Thanks. Thank you. Thank you all.

1:6:56.340 --> 1:6:56.720

Pfordte, Byron

Thank you.

January 30, 2023

Ms. Amanda Maxwell
Executive Director and Secretary
Washington Utilities & Transportation Commission
621 Woodland Square Loop SE
Lacey, WA 98503

Regarding: UG-210755 Compliance Filing to Commission Request for Updates to Advisory Group Pursuant to Order 09

Dear Ms. Maxwell:

In compliance with Paragraph No. 78 of Order 09 in Docket No. UG-210755, Cascade Natural Gas Corporation encloses for filing the minutes from its January 18, 2023, WEAFF Small Group Advisory meeting. The following documents are submitted electronically as part of this filing:

- UG-210755-WEAF Agenda-1-30-2023.pdf

If you have any questions, please contact me at 208.377.6015 or Chris Mickelson at 509.734.4549.

Sincerely,

Lori Blattner

Lori Blattner
Director, Regulatory Affairs
Cascade Natural Gas Corporation
8113 W. Grandridge Blvd.
Kennewick, WA 99336
Lori.blattner@intgas.com

Attachment



WEAF Advisory Group Meeting
January 18, 2023 2:00 – 3:30pm Pacific

Welcome and roll call – *Shannon Steed*

Advisory Group Member	Contact
Blue Mountain Action Council	Sylvia Schaefer
Community Action Connections	Dalia Ochoa
Community Action of Lewis, Mason, & Thurston Counties	Dale Lewis, Sandra Koch
Coastal Community Action Program	Debbie Gregg
Chelan-Douglas Community Action Council	Vern Gurnard, Kristi Hills, Alan Walker
Kitsap Community Resources	Kandi Balandran, Julie Barleta
Lower Columbia Community Action Center	Deanna Dahlberg, Kathy Bates
NW Community Action Center	Jose Alvarez
OIC of Washington	Heidi Silva, Casandra Ochoa, Candi Jaeger
Opportunity Council	Marie Stangeland, Lorena Shah
Community Action of Skagit County	Misty Velasquez
Snohomish County Human Services Dept	Constance Hockett, Manu Morgan, Sara
WUTC Staff	Heather Moline, Andrew Roberts, Andy Sellards
The Energy Project	Ross Quigley, Yochi Zakai
Public Counsel	Corey Dahl
NW Energy Coalition	Charlee Thompson
Department of Commerce	Michelle DeBell
Cascade Natural Gas	
Mark Chiles, VP of Regulatory Affairs & Customer Service	Lori Blattner, Dir Regulatory Affairs
Dan Tillis, Dir Customer Experience	Chris Mickelson, Mgr Regulatory Affairs
Byron Pfordte, Mgr Customer Experience	Pam Archer, Regulatory Analyst
Shannon Steed, Consumer Specialist	Noemi Ortiz, Mgr OR Conservation & Weatherization

1. Company update
 - a. Small group meeting update - *Lori Blattner/Dan Tillis*
Dan – I think most of the company updates will be covered under 2A and 3A so I'll move to 2A. The only other company updated is the recent results distributed by Shannon. November 2022 WEAf pledges increased month over month from October and compared to November 2021.
2. Unresolved items from the previous meeting
 - a. Department of Commerce arrearage funding – *Dan Tillis*
Dan – WA Legislature earmarked \$100M in funds for low-income customers impacted by COVID. Dept of Commerce managed it, they started distributing funds to utilities in late 2022. In compliance with guidelines Cascade was able to secure \$65K in funds for WA customers. Customers had to accrue a past due balance between 3/1/2020 and 12/31/2021, and receive any type of assistance during that period, and/or on a time payment

- arrangement. Dec 31st 2021 was a year ago, so some customers have caught up on payments and/or already received other types of assistance to address their past due balance, which reduced the amount to \$65K. Write off accounts were eligible as well. We provided assistance to 340 active accounts, equating to \$51,749, and 150 write off accounts received \$13,251. All customers have been notified via email or letter. Questions? No*
- b. Recruiting additional CAAs for the Small Group – Yochi Zakai
Yochi- Wanted to make another pitch to Community Action Agencies that have not joined sub-committees, to become involved. Big change on how we will provide assistance to customers. You can help design the program from the ground up. Let Shannon know if you want to join.
3. Update on new program design focusing on agency impacts - Dan Tillis

Dan – We’ve talked about different ways to help low-income customers impacted by the 25% increase for the from the PGA and GRC. One request from the group was to give a one-time grant to help. The Legislative Commerce COVID funds are helping with that. Those went to low-income customers. We also discussed finding ways to determine likely low-income customers who have not reached out for assistance. We’ve engaged Mark Thompson from Forefront Economics. He is looking at a model that would identify likely low-income customers, from there we would determine if we should proactively provide one-time grant to those customers in that group who are past due. This would allow us better insight to that customer base, so we can reach out to them and partner with agencies to possibly utilize the data to improve outreach. We are doing more research on options for obtaining similar data to make sure Mark’s model is the best approach. Once we determine that, we will either move forward or change it. Mark created the same data for Yakima County few years ago, but we did not use the data at that time. The current proposal enhances the model and expands it to all WA territories. We will share that information once we have it. Any questions? No

- a. WEAFF Tariff Revisions filing and calculator redesign – Chris Mickelson/Lorena Shah

Chris – Commission approved Tariff Revisions last Thursday, effective 1/23/23. Included grant CAP at \$625, floor at \$125, rolled in 80% AMI and removed soft budget tiers – now just one budget at \$1.5M.

Misty – With these changes, are we going backwards and providing additional money?

Dan – Yes – Shannon and Byron will handle the calculations for the additional 25% up to the cap and the CNG Billing Team will apply to customer accounts. We will then provide each agency with spreadsheets with the additional pledge amounts for all accounts that received pledges from October 1 – January 20. Every customer will receive the additional 25%.

Chris – Calculator Redesign – came to Cascade’s attention there were a couple of errors on the calculator originally created by UTC Staff. Cascade only updates poverty level for each program year. When we started to dig into it the errors came to light. Another thing, some of the agencies are using their own calculators. Can you advise if you are? (Lorena said that Skagit and Opportunity Council use the same one that they create together. Chris shared the version of this calculator he has and asked if this is the one used. Lorena said yes. She also said it uses CNG’s calculator but is put into a master spreadsheet with all the other calculators they use. Chris went through CNG’s calculator in detail. Rounding should only be done at the end, in that calculator it is rounding at every step, therefore amount wasn’t calculated correctly. Discussed WEAFF Bill discount benefit (which was designed some time ago).

Could you provide an example to illustrate the WEAF bill discount benefit calculation?

Yes. For example, let's consider a low income household with average consumption and a total yearly bill of \$535,⁵⁰ of which 62 percent, or \$332, is the heating bill prior to the application of any LIHEAP benefit. If this customer falls into the income bracket of 0-50 percent of FPL, LIHEAP will provide a grant that equals between 84-90 percent of the heating bill for this income bracket. For illustrative purposes, let's assume that LIHEAP provides \$289 of support (the average between 84 and 90 percent, multiplied by the heating bill of \$332). In this circumstance, a WEAF bill discount (as Staff proposes) would provide 30 percent of the discount off of the bill. Over the span of a year, that would be a discount of \$161 (yearly bill multiplied by

In talking with small group – LIHEAP does it the above way, is that the method that was agreed too? If so, need consensus that calculator will divide annual increase in bill.

Lorena – Essentially been doing it this way for years, we supply back up heat costs – extrapolating yearly gas usage using just heat cost. Always done it that way with calculators, recommending that continue. Use back up heat cost from CNG, then formula to create gas usage, then benefit off full gas usage as opposed to just the heat cost.

Chris – Any questions on that piece? Is everyone in agreement? That is different from what we've worked on. I do need to get consensus.

Misty -Skagit – yes

Manu-Snohomish-yes

Yochi - yes

Andrew – anything related to the calculator is regulatory services area, and with him being in consumer protection, he's not comfortable speaking to the calculator

Chris noted that no one from regulatory services appeared to be in the meeting

Corey - Public Council – yes

Charlee - NW Energy – yes

Sylvia – BMAC – yes (via chat)

Julie – KCR – yes (via chat)

Jose – NCAC - yes (via chat)

Heidi – OIC – yes (via chat)

Chris - Ok will keep the formula in place.

The new calculator was then shown and walked through. No questions.

Dan – This would be the calculator we would want agencies to use starting 1/23. If you have questions, reach out to Shannon. Huge improvement over the last one.

Jen – How is it determined between which to use AMI/FPL?

Chris - Goes off whichever provides the higher benefit.

Jen – Can you show demo for backup?

Chris – Walked through the calculation – if they have been in house less than 12 months, back up is used.

Jen – Will this be adjusted to our agreed backup heat cost?

Chris – Yes

Jen – Can you delete Propane only, doesn't really apply?

Chris - Yes

Yochi – Thank you to everyone that prepared this and increased benefits.

Dan – Let's make sure we start using the calculator on Monday, 1/23. Any issues or questions, reach out to Shannon.

Chris – will send out updated calculator.

Lorena – Confirm, any pledges Monday, 1/23 or later, use the new calculator – prior to 1/23 use calculator you have now.

Shannon – Yes

4. Dedicated discussion of an agreed upon topics

a. No submissions from the group from the January 9th email request

b. Topic ideas for the February meeting

i. CBO program development – *Yochi Zakai*

Yochi – would like to discuss community-based organization trusted messenger program. He sent email on the topic earlier in the day. Open to feedback.

Shannon – Any ideas on CBO program, please feel free to share.

Yochi – Suggested working with each other in between now and the February meeting.

Dan – Review document Shannon sent and Yochi's document – prepare before next meeting.

Meeting adjourned

February 06, 2023

Ms. Amanda Maxwell
Executive Director and Secretary
Washington Utilities & Transportation Commission
621 Woodland Square Loop SE
Lacey, WA 98503

Regarding: UG-210755 Compliance Filing to Commission Request for Updates to Advisory Group Pursuant to Order 09

Dear Ms. Maxwell:

In compliance with Paragraph No. 78 of Order 09 in Docket No. UG-210755, Cascade Natural Gas Corporation encloses for filing the minutes from its January 25, 2023, WEAFF Small Group Advisory meeting. The following documents are submitted electronically as part of this filing:

- UG-210755-WEAF Agenda-2-06-2023.pdf

If you have any questions, please contact me at 208.377.6015 or Chris Mickelson at 509.734.4549.

Sincerely,

Lori Blattner

Lori Blattner
Director, Regulatory Affairs
Cascade Natural Gas Corporation
8113 W. Grandridge Blvd.
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Attachment

WEAF Advisory Group

Agenda

January 25, 2023

KEY TOPICS: Status check on new WEAF calculator and changes effective 1/22/23, Rate Discount and Arrearage Management Program design.

GOALS FOR MEETING OUTCOME: Ensure all is going well with WEAF changes and new calculator, address any issues or questions, finalize 1 – 2 key decisions for new program design.

Key Decisions or General Agreements from 1/25/23 meeting:

The group agreed we will utilize the tier structure listed below.

T1	0-25% FPL, 0-10% AMI
T2	26-50% FPL, 11-20% AMI
T3	51-100% FPL, 21-40% AMI
T4	101-150% FPL, 41-60% AMI
T5	151-200% FPL, 61-80% AMI

There was general agreement among the group on the following:

- Customer self-attestation of income, HH size, etc.
- Establishing a post-qualification verification process.
- Post-qualification verification process likely to be conducted by the Community Action Agencies.

1. Status check on new WEAF calculator and changes – Dan Tillis

Tillis, Daniel -We wanted to check in to see how things are going with the changes and the new calculator that went into effect on January 22nd. The calculator really should be taking care of the changes for the agencies as far as the minimum of \$125, max of \$625, the 25% adder and incorporating 80% AMI. So, let's start with the agencies - How are things going? Any questions? Any issues?

Lorena Shah - I think from our perspective, it's going fine. We are working on our individual one. We've been going back and forth with Chris to identify a couple of additions that have come out. But, I think all is going well at least from Opportunity Council.

Tillis, Daniel - OK, great.

Mickelson, Christopher - How about your internal calculator? I know we provided some feedback on that, has that been incorporated?

Lorena Shah -Yes, Jen incorporated those. The errors that you found in ours, yes. I don't know if she's fully deployed it yet, but she's been working on those.

Mickelson, Christopher - Ok

Misty Velasquez Community Action of Skagit - We are using the one you gave us until Jen gets the one fully incorporated. It's working fine.

Mickelson, Christopher - Good to hear.

Tillis, Daniel - OK, great.

Candi Jaeger - I've not heard anything that it's not working. I think it's working just fine with us too.

Tillis, Daniel - Great. Thank you, Candi, Marie, and Lorena. Hopefully we've seen some higher pledges with the 25% addition and have seen some hit the \$625 max instead of the \$500.00.

Misty Velasquez Community Action of Skagit - So now that we're using the new calculator, when could we expect getting the information from you guys on all the prior customers that are going to get the increases?

Tillis, Daniel - Great question. I was going to ask Shannon if she could provide a status update on how we're doing on those calculations and spreadsheets.

Steed, Shannon - It's in process, but you will get a list of your clients or customers for your agency. I'll let you know when those are coming out.

Tillis, Daniel - OK. Any other feedback or questions on any of the changes or the calculator? No

2. Design of rate discount and arrearage management programs (see below) – Byron Pfordte

Tillis, Daniel - This really is a massive topic obviously and now that prior year changes are behind us and in place, we'd really like to turn our attention and the larger full advisory group's attention, to designing and developing the new rate discount program, and hopefully the new arrearage management program that would replace WEAf, and whatever we end up calling the two programs, separately or combined. With that, I asked Byron Pfordte on my team to provide a summary of what was discussed since he led the conversation for us during the last meeting, where there was fairly extensive discussion on program design. One to refresh everyone's memory and then I think we can go from there and decide what we want to discuss today. It might be a continuation of some of those items that were discussed last time and try to get to decision points, or it could be a different topic. I did put the list of topics to discuss related to those programs in the agenda. One of the goals we have for the meeting is to maybe finalize one or two key decisions for the new program design, so hopefully we can get to that as well. Lori and I do need to drop off the meeting a little bit early today, but you all can continue the discussion if it's still ongoing, and we'll catch up later. So, with that, I'm going to turn it over to Byron.

Pfordte, Byron - I'm sharing what we discussed. We talked about tier levels a little bit in our last meeting and Chris shared these with me today. He shared the Tiers. These are the two proposed tier levels. We had SMI in there at some point and those have all been changed to reflect AMI as you can see in the first set of tiers.

Tillis, Daniel – There are some key differences. One is the ranges are a little different on FPL between the two. The second one only incorporates AMI once you get to that 151% to 200% FPL tier. So those are really the two differences between the design.

Yochi Zakai - I think that first I'll just say the second one is what Avista agreed to as its tiers. So, I think that's where that came from as we were just providing an example of what Avista will be using. And

then I think the first set is probably a modified version of what Cascade proposed earlier. Does that sound right?

Pfordte, Byron - Yes.

Yochi Zakai - I guess I would recommend that we focus our first decision on the similarity with the calculator we just rolled out. We decided to have the benefit curve fixed for the entire service area, even though the eligibility cap varies based by county. So that approach is kind of like the second grouping there, where you're just using FPL to determine the benefit tier. While in the first option, you're using both area median income and FPL to determine the tier. So, I think that's probably a good first decision - do we want to have the tiers fixed for the entire service territory, or do we want it to vary based on area median income? If I can suggest we try to tackle that specific item first.

Pfordte, Byron - Chris, correct me if I'm wrong, but with the second group of tiers the calculator is a bit simpler, correct? There are less inputs needed, is that correct?

Mickelson, Christopher - So for either one from a calculator standpoint, when we implement it, it will be simpler, and that's partly because we don't really need a benefit curve. When you fall into a tier, you're getting a flat discount amount, so either one will be simpler to apply. If anything, the first option would be more accurate and provide the most benefit to the most people.

Yochi Zakai - And can you say a little bit about why you think that?

Mickelson, Christopher - Because you're having the ability between FPL and AMI and so some customers, and we've seen this in Oregon, where maybe a customer would be at 26% FPL, but they really kind of fall in between. There's kind of these in between boundaries where they would be considered 10% AMI. And, so in that instance they would get the higher benefit of the AMI versus the second-tier benefit of an FPL. We've noticed this where they are right on that edge of that range. Where you go from 1 tier to the next - hopefully that makes sense.

Roberts, Andrew (UTC) - If the AMI tier is wider, why is there an FPL option as well?

Mickelson, Christopher - Well, it's not always that AMI will be wider. Sometimes the FPL will be a better option. It varies by county, so your higher cost counties AMI will be wider in your lower cost counties, your FPL will be wider. So, it kind of depends which counties you're looking at.

Roberts, Andrew (UTC) - OK. Thank you.

Corey Dahl (PCU-he/him) (Guest) – Taking a look at specific examples of how much customers would be receiving with either of these options, I would agree that the first one. It looks to be the more comprehensive in terms of the coverage it would provide, particularly looking at the range of incomes included in tier one, which would be the largest discount that would be offered to customers, so that that's my first impression. But, obviously interested in hearing more from others.

Charlee Thompson - That's a good point, Corey. I was trying to figure out how to say that because I was looking at that second grouping that I think came from Avista. And if we did go that route, I was going to bring up maybe increasing the first tier from zero to 5% to maybe the zero to 25% proposed in the tier one and the top grouping. But I think I agree having the more comprehensive FPL versus AMI. It sounds

like it's not any more difficult on Cascade to add that functionality? Also, curious to hear what other people think, but I do like the zero to 25% as opposed to the zero to 5% in Tier 1.

Yochi Zakai - So if I can guide our conversation a little bit, I want to encourage us to let's start with the structural decision of should we include AMI or not, before we move on to what the exact level should be. Hopefully we can accomplish at the very least that today if not more.

Tillis, Daniel - Yeah, I think that's fair. If you're looking for votes, my vote would be for the top recommendation with the FPL and AMI included at each tier level.

Pfordte, Byron - That is what sparked this whole conversation to begin with, right? We had SMI included and the goal was to include AMI, so if that is the goal of this group, then I don't know how much more effective you can be than the AMI tiers that we have presented.

Lorena Shah - I would agree, I like the idea of it being kind of household of 1. We're looking at 150% of FPL, or 200% of FPL, or 80% AMI, whichever is higher for that household size. That's how we describe that in our other programs that share income eligible or income guidelines. Thank you for explaining how the top one is and can be more expansive and include more people. So, for that reason if it's not more complicated to install an AMI calculator, I am in favor of the top one at this point. Meaning the income part of it.

Pfordte, Byron - So anybody opposed to using AMI in that top tier or group of tiers?

Yochi Zakai - I'd love to hear from some of the CAAs and anyone from the agencies who joined. Misty put in the chat that she's supportive as well of using AMI so.

Pfordte, Byron - I don't hear anybody voicing any concerns against it so we'll move forward with that and on to the next topic.

Shannon and I met with Avista, and they've broken a little more ground in this area than we have, thus far. They did a couple of tests which I found interesting, and I'll share with you what they shared with us. They reached out to customers who have not received assistance in the past but had a past due balance and did direct mail and contact with these customers. They found that only 4% of who they reached out to actually called or reached out to an agency or the utility directly for assistance. So, they were surprised by the very low return rate. Alternatively, they are sending weekly reports to agencies of customers enrolled by the utility and that they found has been much more effective. And, as we know we look to make sure that anybody contacting the utility directly for a bill assistance is also being introduced and exposed to agency funding and programs. I do like the approach, and it wouldn't be an issue for us to share who we enroll on a weekly basis, I think we had talked about that briefly in the last meeting. I did have some concerns about the extent of the information that we would share back and forth like names, phone number and contact information for customers enrolled, certainly wouldn't be an issue. I do have concerns about sharing anything else or collecting anything from our customers outside of what we would need to enroll them in our services. I've had talks with our internal security groups and they have concerns with storing information and we will continue to look at ways to securely do so, but we have a responsibility, obviously to make sure that anything we collect from our customers stays secure and so a lot of the demographic and socioeconomic questions or data that we've discussed possibly collecting, really adds quite a bit of burden to a utility that isn't normally in the business of collecting this sort of information. I am all for a weekly report to the agencies letting you know who has

reached out to us for assistance, so the agency can reach out and approach these customers with funding. And I'm open to any other ideas for how to cross promote these programs.

Yochi Zakai – If we don't collect some demographic data, then how can we track if we are actually serving the vulnerable populations that would be identified by collecting the customers demographic data?

Pfordte, Byron - Correct me if I'm wrong here, but to qualify for LIHEAP or any of the federal funding, the agency has to collect that information firsthand from the customer to enroll. Then it's my understanding is that they can't use the information we provide anyway to qualify a customer. Am I correct in that?

Yochi Zakai - I'm not talking about qualification in other programs. I'm talking about tracking the success of the bill discount rate in serving specific vulnerable populations. My point is, if you don't track who you're serving, then you can't tell if you're doing a good job of serving the vulnerable populations that the program is designed to reach.

Pfordte, Byron - Based on self-attestation and then doing these audits, I think that is where we will rely on whether or not these programs are actually serving the population that they should. I just hesitate to, I have issues with the utility collecting citizenship information, insurance information, social security, etc.

Tillis, Daniel - Couple things here, I think we've jumped ahead. I appreciate Byron sharing that information that he gathered from Avista and his thoughts on it. I think that's a great topic for future discussion, and it gives us some information to consider. I think we'd like to figure out a way where we can securely collect certain types of information. I do think there is certain information that we likely will not want to collect, and Byron just referenced a couple of those, like anything related to the customer's medical situation. I think where we wanted to go next was the actual ranges within each tier. So, let's take that step back, we want to confirm that we all decided as a group that we will have five tiers, with FPL and AMI included for each tier, correct? Yochi - if I understood you correctly, your suggestion was to then talk about the actual ranges themselves for each tier, try to maybe get to a decision on those today or at least close to that if possible. And then probably the next logical decision would be trying to figure out what the discount level at each tier might be that's missing from this information right now. So, if it's OK with the group, I think talking about those ranges might be next step. Byron, I appreciate the Information and I think it gives us food for thought for a future meeting. I would like to get a couple of these tiers settled.

Pfordte, Byron - I'm sorry, I thought we had agreed on that and moved on. My apologies if I jumped ahead.

Tillis, Daniel - No, that's OK. We agreed on the top structure. We just wanted to go to the ranges within each tier and with that does anybody have an opinion on what's on here already for the ranges. Any particular one you don't like, or you do like – I'll open it up for the group.

Yochi Zakai - Well, I'll start off by saying they think you're right, Dan, in that looking at the discount that will be applied to the bill is probably something that at least I'd like to set the income tiers and the discount percentage at the same time so that there is a tradeoff between the two. If you're only serving the lowest in your first tier, is it really focused on low income, you can feel more comfortable having a

really, really high discount for there. On the other hand, if it's a broader group, you might want the discount to be a little less, and I think that's kind of true with every tier. And so, the decision at least in my mind are the income level and the percentage of discount are intertwined.

Charlee Thompson - I agree with that Yochi.

Tillis, Daniel - That makes sense. Chris, did we have a recommendation with that top structure we're going with for the AMI and FPL on every tier level to share?

Mickelson, Christopher – No, not based off a 5 tier structure. I mean we did have what we proposed last year but that was based off of a four tier structure. We would have to re-evaluate to see what adding a fifth tier and what those kinds of numbers would look like.

Tillis, Daniel - OK. So then we're probably not ready to talk about the ranges then since we don't have the discounts to share.

Charlee Thompson – Would it help to share what Avista has proposed for those five tiers that they had?

Tillis, Daniel – They're going with the same structure. For the AMI and FPL on every tier level, did we have that already to share?

Mickelson, Christopher – No, not based off of a 5 tier structure. I mean we did have what we proposed last year but that was based off of a 4 tier structure. So, we would have to reevaluate to see adding a fifth tier and what those numbers would look like.

Tillis, Daniel – OK, so then we're probably not ready to talk about the ranges then since we don't have the discounts to share.

Charlee Thompson - Would it help at all to share what Avista has proposed for those five tiers that they had. We might have a number to work off of for the top set.

Mickelson, Christopher - 94% for tier 1, 75% for Tier 2, 35% for Tier 3, 20% for Tier 4 and 15% for tier 5.

Charlee Thompson - I think Yochi what you were saying was, like Avista's first Tier 0 to 5% and they have a really high discount at 94, which is great. But if we're now considering a 0 to 25% range, do we still want it to be like at around that 94% or because it's broad or do we want it to be 90% or something else?

Lorena Shah - One other point of clarification that might be helpful, and it may just be a reminder for me – in the new model that will be coming up in October, the rate discount will go away and there will be an arrearage management plan of some sort that will be working as needed in conjunction with the build discount rate. Is that correct?

Tillis, Daniel - That's the recommendation from Cascade.

Lorena Shah - OK, there will no longer be a WEAFF type bill assistance program anymore to consider cause with PSE, we're considering the two together. And I just want to make sure we are talking really only about the bill discount rate is going to be the main mechanism for reducing bills and the AMP will come in as necessary for people that have.

Tillis, Daniel - Correct.

Lorena Shah - Arrearages is not to be considered as a part of the overall benefit to the client in a future focused way.

Tillis, Daniel – Yes. So just the way we have things structured in Oregon right now for example, starting this past October 1st is that one calculator determines, based on customers income level, household size and arrearage amount. Current arrearage amount determines whether or not they qualify for an OLIBA discount in Oregon, which is very similar to WEAFF. So, an arrearage management pledge would offset either part or all of their current past due balance. Then, at the same time whatever tier, if any, they qualify for the rate discount and that's the way the company envisions it working in Washington as well, with maybe some minor differences, but that that's what we would like to have happen, yes.

And Chris, correct me if I'm wrong, the ranges at least for FPL that are there, and the initial 4 tiers, were informed by the low income needs assessment conducted by Forefront Economics for us. And I'm assuming Chris, you probably took that and tried to still massage it into the 5 tier ranges as well. Is that fair?

Mickelson, Christopher - Correct. And the same with AMI, but they don't go as granular. So, kind of going back to what Yochi was indicating, if we change it to smaller tiers, we may not have that granular information currently to be able to kind of analyze - we'd be making some assumptions, I'll put it that way.

Yochi Zakai - I think no matter what we do, we're going to be making some assumptions here. But I would appreciate the next time we have a discussion about the tiers, if the company wanted to try to use what data is available to you, I think that would be good. And I can commit for TEP to go back and think some more. The one thing that I have been thinking of that I know isn't super helpful, but, is a principle that I have been thinking of is, the significant overlap with PSE service territory, if it might makes sense to also think about coordinating the tiers and discount levels with PSE still in the design phase, they haven't figured this out either. I'm not saying they have to be exactly the same, but of course, one thing that comes to mind for ease of explanation to customers who are dual fuel with PSE, is that if there was a little bit of overlap that might be nice, but not a requirement for sure.

And the other thing I wanted to mention, just because we touched on the arrearage management plan as well, and this is definitely a more free flowing agenda than I was anticipating, we could drill down and now really focus on one topic that when we've been able to prepare but TEP envisions n Arrearage management program that would provide a certain percentage of forgiveness after on time payments, so if you've got 12, if you're going to do full forgiveness after 12 months, then you might forgive 1/12th of the past due balance on each payment. And I think that I would consider a kind of a more traditional type of arrearage management program is different than what the company had proposed before and that was just to give you some insight. One of the reasons why I was a little uncomfortable with the name AMP to what you were using before because that doesn't meet kind of what I see in the literature as the definition of the traditional arrearage management plan, and so one of the things that we'll have to consider is the design of an arrearage management plan and exactly what we want it to look like, and TEP's hoping that it can be more of what I described along the lines of, what I would consider a traditional arrearage management plan.

Tillis, Daniel - Once we get close to finalizing our structure for rate discount program, I think we will want to dive into the arrearage assistance program that we're going to develop. I know that there's a

desire not to call our recommendation an arrearage management plan. I guess I'm curious why TEP supports something that requires the customer to make a potential long-term commitment versus the design that Cascade previously recommended, that gives the customer immediate relief from a what could be almost all, if not all of their arrearage balance down to a smaller percentage in assistance.

Yochi Zakai - It's my understanding that coupling an arrearage management plan with a bill discount rate is a tool for bringing total energy burden down to the manageable level, which is our goal. And I think, and I'm curious to hear if Lorena or others have thoughts on the primary purpose of having forgiveness as you go is that it's a plan that encourages regular payments at the sustainable level. I have to admit I'd have to go back to the literature. I just recall that it is the best practice. But I don't remember everything that went into why it was the best practice. So, I can certainly come back if others don't know, I can do that research and bring that back to our next meeting.

Lorena Shah - I think you hit on the main purpose, or the main angle on TEP's thinking on encouraging and motivating folks to be able to make payments at both rates and payment amounts that they can afford to encourage that positive payment behavior to sort of help draw people out of that crisis mode. To help modify that payment behavior was really the reason of having the more classic AMP we considered.

Charlee Thompson - I have an example that maybe would be helpful, when I was with the energy project I studied and did some analysis on COVID programs for Washington's five IOUs, and one thing that came out of that study was that customers who received the one time COVID assistance or a couple times COVID assistance payment, eliminated all or most of their arrears. It was great because it, like Lorena said, it kind of took them out of that crisis mode for that month. But then in the following months their arrears just climbed back up, which was an issue because they didn't have a consistent way to reduce their energy burden. So, I guess in support of what you can learn, having a long term but consistent way to be able to have a manageable bill, every single month.

Tillis, Daniel - I know we're getting pretty far into this discussion, and I think it's OK because it allows us understanding for future discussions. In my opinion, and I think it's shared by a lot of folks at Cascade, there are a few reasons why we recommended what we did previously and now have in place in Oregon. Now it's still under the OLIBA umbrella, but it's working the way we previously recommended with Washington, one reason is simplicity as part of it for everyone involved. Rather than here is what you have to do for the next 12 months - here's your pledge now and that will offset either all or part of your arrears balance. And now this is your rate discount going forward. If they have remaining arrearage balance then we can discuss payment arrangements to help with those as well. But they get the pledge or the credit right away.

The other reason is when I think about those folks in that very low tier, someone that may be at 10% FPL or less than 10% AMI, one of the goals of energy assistance is to remove the stress those customers are under for paying all of their bills including their utility bills. And that's something we heard about a lot during COVID, and we hear about regularly, is that real stress of -I get my utility bill or other bills and its trauma. So, as much as we can just remove that stress and trauma and set up that pay plan arrangement if there's remaining balance or they can just be current. If it took care of most or all of the arrearage and get the discount, and hopefully be able to keep up going forward and maybe get assistance again at some point but have a better shot at keeping current. So those were the couple of reasons why we designed the program the way we did.

Yochi Zakai - I think as we're talking about serving higher income customers, different approaches might be appropriate for the different income tiers in terms of arrearage management as well. For example, Avista designed their Arrearage management program to provide immediate forgiveness for customers between 0 and 50% FPL, and then those who are 50% to the top income tier are entered into a traditional arrearage management plan. I forget if they use 12 months or 18 months for their time period. So that's something to consider as well. I don't know what went into the analysis for figuring out at what point it makes more sense to have, I'll just call it the one year program for simplicity. But for whatever longer time period we want, perhaps for the lowest income customers that immediate forgiveness does make sense, and for those that have a little bit more of an income than providing that incentive to pay on time is, coupled with the BDR is a good approach.

Tillis, Daniel - I do recall seeing that presentation on their programs. I think that was a good use of time. At least it was for me to get some thoughts there on where we might be headed with the other part of the two programs are trying to design. Maybe we jump back to EDP for a minute? I need to drop off in about 15 minutes or so, and I think Lori's dropping about similar time, but maybe we could have a little bit of conversation around another component and that's part of the qualification process and is self-attestation. Our EDP recommendation for the temporary program was using self-attestation. And so, the company is supportive of that. We have it in Oregon, and it's implemented as part of the temporary program that's in place, effective last year. Any thoughts on self-attestation? Anyone disagree with that approach? Obviously, we have to work out what that all looks like, but just in general, how do people feel about that?

Charlee Thompson - I'm all for the use of self-attestation. That's what the other four utilities in Washington are talking about right now. So, I think it makes sense to be consistent.

Corey Dahl (PCU-he/him) (Guest) - Public counsel supports self-attestation as well.

Yochi Zakai - TEP supports self-attestation as well. It is a big change for the agencies and there will be a change management aspect of implementing this program that will be necessary in order for it to be successful for all.

Candi Jaeger – OIC is in support as well.

Tillis, Daniel - Does anyone disagree with self-attestation as a concept? Nobody disagreed. Maybe continuing the thread and that chain of thought with self-attestation often comes some post some desire for a post qualification audit process. Any general thoughts on the having an audit process and then any thoughts on percentages that you might think are reasonable to audit?

Corey Dahl (PCU-he/him) (Guest) - I think from a high level, I think language and especially from a customer facing standpoint, calling it an audit, this is a really scary sounding thing. So, income verification or something like that, enrollment verification is probably a better thing from an operation standpoint, getting into the details of the number of customers that would be income verified. That's more the details that we can talk about as we go.

Charlee Thompson - Dan, that's such a big question. High level thoughts are great but with Avista we've been going through a bunch of details slowly over the past few months and we're kind of stuck on this one, it's all good and productive conversation. There's like so much to figure out about it and so many different thoughts, so I don't know how much we're going to decide on that right now. I did want to

back up, just really quickly to the self-attestation piece. Something that we'll either want to talk about now or likely in the future, is, its self-attestation of net income or gross income with LIHEAP deductions or not? And can those of us who are in other subcommittees for different utilities share what's been going on there too. But I guess just flagging that for the future.

Misty Velasquez Community Action of Skagit - I have a question regarding that, are we expecting CAP agencies to do these income verifications at some point, and if so, my vote would be to use the LIHEAP standards for income, so with the deductions that LIHEAP uses and stuff like that, just to make it easier and we don't have so many different standards to have to remember and go off of when we're doing these. If that's the route it's going.

Yochi Zakai - So you have to support the agencies, being the entity to perform the income verifications.

Tillis, Daniel - I think that's the company's position at this time, and unless there's a better option that comes up for some reason and you know, Misty, I don't know a lot about those LIHEAP standards for income, so I think that's definitely something we'll have to talk through more details on because if that's what we're going to use in the post enrollment verification process, then we'll want to have our Cascade employees asking for that kind of information in some way up front, so that you know we're verifying on the back end what we've used to qualify with on the front end. So, I think we'll have to work through that. I think we have general agreement on self-attestation with a lot of details to work out. I think the general agreement on some sort of post enrollment verification process, probably general agreement, that will be done by the agencies. So, there's some general guiding agreements that we have right now.

Corey Dahl (PCU-he/him) (Guest) - I was just about to jump in and say that I agree that. It makes sense for the agencies to be doing that income verification, since they're experts in that they know how to do it and to a large extent will be going through the process of income verifying for LIHEAP and other programs as well, so that will cover a number of customers that would be included in the income verification process.

Tillis, Daniel - I think you mentioned PSEs programs earlier and I don't know that I've seen those. Do you or does anyone else have what they're working on so far? I know you said they aren't final, but if not, I can reach out, we actually have a meeting tomorrow with Carol Wallace from PSE, I could ask then.

Yochi Zakai - Carol hasn't been involved in their committee discussions on how things are going. But I think she is the VP that things report up to over there. I would say they have been in kind of a sprint to figure stuff out there taking an IT project management approach to their decision making. They are prioritizing making decisions based on how they need to do modifications to their customer and billing systems. And so, it's a different approach than folks who are in these committees are used to taking to program design and they kind of have teed up a lot of items for discussion, and there's been some consensus, but Avista is much further along in having a design, for example of tiers and stuff like that, PSE isn't there yet. We just agreed that they would go up to 80% AMI, but we haven't figured out what the tiers are yet. So, they're kind of more where you are in terms of some of the specific design decisions.

Tillis, Daniel - Ok being tied for second is better than being in last, so that's good to hear. We will just see if they're willing to share anything they have so far, and then maybe stay connected along the way. We could try to be as close as possible knowing that they are a combo utility, and we're stand-alone natural.

gas. So, I need to drop off here in just a couple minutes, I'll ask Chris, Byron or Shannon to continue guiding the conversation along. I think we've covered a lot of ground today with getting agreement on the General 5 tier structure and general agreements on self-attestation, post qualification verification and the agencies likely doing that. Do you all want to continue, or do we want to just adjourn? For the tier discount percentages, we can talk about that in the next meeting and work around some of the other topics as well.

Pfordte, Byron - I do want to ask a quick question, and Shannon I think you brought this up, using LIHEAP to verify income and collecting some of that information up front when we qualify, I'm curious – this was brought up in a conversation that we had with Avista, if we're collecting all this information at the utility level, is there going to be confusion with customers that they're actually qualifying for LIHEAP and these other programs and expecting us to enroll them at the same time? We do the energy discount program or any of our programs as well. And so, I do have concern about collecting, you know, that type of information on the front end.

Lorena Shah - I think, correct me if I'm wrong, Misty, what Misty is trying to say is that we wouldn't be using terms like LIHEAP, income and that. It's a just about how we ask and then handle that income. So, like what we're talking about with PSE, potentially because they'll have a fairly sophisticated online application, and I don't quite know how much development CNG will plan to do. But we've talked about basically building in a couple of formulas so that when the utility is collecting the income information, there would be, for instance, a field that we would enter the last 30 days, or whatever the time frame is of gross earned income. Then, they would enter the gross income and then the behind the scenes there would be a calculator that would deduct 20% off of that, because that's how LIHEAP deducts and how it calculates. And then there might be one other area where there the gross and net differs and these are less common is with tax pensions taxed, unemployment. There could be like one additional field for entering those types of income that would take a 10% deduction and then the rest you would enter. You know, Social Security, SSI, and any other exceptions, but we don't need to get into those. Those are pretty much going to be the same whether they're gross or net. It's really, the earnings where we want to handle that. The same where we get to take a 20% deduction rather than relying on that client to enter their net, which then is different from how we calculate it. So, if there's a way for the application to do a little bit of that calculation, then I think it would be pretty straightforward to keep all of the programs in alignment as to how they calculate that income.

Misty Velasquez Community Action of Skagit - Exactly. Thank you, Lorena.

Tillis, Daniel - I need to go to another meeting. I'll let you all decide if you want to continue adjourn, thanks everyone.

Pfordte, Byron - I'll just I'll bring up this last point and see if we just wanted to go ahead and set some topics for our next meeting and that way we're not caught off guard and unprepared. Discount levels is something that we were discussing and so internally, and I think Chris is going to gather some information to develop some preliminary discount levels, and then if we want to work out these pieces of what we need to collect on our end that is going to streamline and help everything to be cohesive from us to the agency, for our surveys or online applications or however we qualify. I think that would be a good topic as well. Any other suggestions

Yochi Zakai – Can you say the second part of that again, I didn't catch it.

Pfordte, Byron - Kind of building off what we were talking about at the end there, having some form of outline for how we want to collect this or what information exactly we want to collect on our end so that we're providing everything that the agency needs and without overstepping our bounds as well. On the utility side, we're actually kind of doing this process in Oregon as well, kind of developing questions that makes sense for both sides and how we can align all of those. What the agencies needs as well as ours. I developed a form that we went through, and they critiqued, and we took some notes and that's just a work in progress. I can do the same thing here, start working on what that would look like on our end so that you all have something visually to look at and say, this isn't going to work, this is where we need to make changes, and if that's something that would help, I'm happy to do that.

Yochi Zakai – So, if we're talking about data fields to be collected, do we think it would be helpful to start with the information? And again, I'm not saying that all this information needs to be collected, but it might be helpful to start in terms of like having a list of things to start crossing things off from, looking at the information that's collected on the household information form for LIHEAP.

Pfordte, Byron - Yeah, that would be a good starting point. Shannon, do you have what's required there? I don't have what's all collected for a LIHEAP application. I don't know if Shannon has it or somebody can share that with me. But that would be great.

Steed, Shannon – No, I'm sorry I don't have it. Lorena, do you have it?

Lorena Shah – Yes, we can share that with you.

Pfordte, Byron - In my mind those two topics, based off of the last couple of conversations, will eat up the majority of our time. Anybody else have anything they want to add to that? If not, we can get out of here a little early.

Yochi Zakai - That sounds good. I would like to reiterate the request that the agendas get out by Friday and they're a little bit more specific. I think we've done some of that work now by choosing the specific topics, but it would really help us to prepare and chat in advance and think about what's going to be discussed.

Pfordte, Byron – OK. When Dan sends out the next agenda, I'll try to have those data fields included from the LIHEAP application so everybody can look at those ahead of time and hopefully have some notes and some good input for the next meeting. Alright, Chris, Shannon, anybody else have anything they want to include?

Steed, Shannon - No, I can't think of anything else from me.

Mickelson, Christopher - Nothing for myself.

Pfordte, Byron - Anybody else? Once, twice, well thank you have a good day.

3. Set key topic(s) for next meeting – All

- Arrearage Management and Rate Discount Design
 - Design of income-based tiers

T1	0-25% FPL, 0-10% AMI
T2	26-50% FPL, 11-20% AMI
T3	51-100% FPL, 21-40% AMI
T4	101-150% FPL, 41-60% AMI
T5	151-200% FPL, 61-80% AMI

T1	0-5% FPL
T2	6-50% FPL
T3	51-100% FPL
T4	101-150% FPL
T5	151-200% FPL, 80% AMI

- - Joint administration between utilities and community action agencies (CAA)
 - Ensuring utility-enrolled customers can access other services, including LIHEAP, weatherization, childcare, rental, banking, water assistance, etc.
 - Tracking number of customers enrolled by utilities that proceed to CAA intake.
 - Information sharing, i.e., individual customer demographics provided to CAAs.
 - Enrollment
 - Self-attestation of income/HH size
 - Audits for verification
 - Type of income, length of enrollment, processing changes in income, time to provide documentation, selecting customers for audit, etc.
 - Use of categorical eligibility to either very incomes or enroll customers.
 - Utility and CAA design a joint communication plan documenting:
 - Program launch, informing customers they are selected for audit, informing customers they are not income-qualified, and responding to media inquiries about eligibility and fraud.
 - Managing overlap between LIHEAP and bill discount program; developing a plan to maximize use of federal funding.
 - Reporting

February 10, 2023

Ms. Amanda Maxwell
Executive Director and Secretary
Washington Utilities & Transportation Commission
621 Woodland Square Loop SE
Lacey, WA 98503

Regarding: UG-210755 Compliance Filing to Commission Request for Updates to Advisory Group Pursuant to Order 09

Dear Ms. Maxwell:

In compliance with Paragraph No. 78 of Order 09 in Docket No. UG-210755, Cascade Natural Gas Corporation encloses for filing the minutes from its February 08, 2023, WEAFF Small Group Advisory meeting. The following documents are submitted electronically as part of this filing:

- UG-210755-WEAF Agenda-2-10-2023.pdf

If you have any questions, please contact me at 208.377.6015 or Chris Mickelson at 509.734.4549.

Sincerely,

Lori Blattner

Lori Blattner
Director, Regulatory Affairs
Cascade Natural Gas Corporation
8113 W. Grandridge Blvd.
Kennewick, WA 99336
Lori.blattner@intgas.com

Attachment

WEAF Advisory Group

Agenda

February 8, 2023

KEY TOPICS: Decisions and general agreements from 1/25/23 meeting, arrearage pledges and bill discount rates by tier, income and other data to be collected by company and agencies.

GOALS FOR MEETING OUTCOME: Ensure agreement from 1/25/23 decisions, decide on arrearage pledge percentages and bill discount rates by tier, develop initial list of data to be gathered by the company and agencies.

1. Recap of decisions and general agreements from 1/25/23 meeting – Dan Tillis

Dan - The Minutes and the agenda both included a recap of key decisions or general agreements from the January 25th meeting. But the first agreement we had was the tiers to utilize, and there were two options we considered. We chose the five tiers with each having an FPL and an AMI range and that's listed here. Then we had general agreement that customers will be able to self-attest to income and household size, and that we should have a post qualification verification process of some sort that will very likely be conducted by the Community Action agencies.

Yochi – We agreed that we would have both FPL and AMI for each tier. I'm OK with five tiers, but I don't recall if that was explicitly part of the with it. I guess I might be open to a different number four or six or five, but that that seems like a good starting point.

Dan - I think that will lead us soon into the conversation for item 2 where Chris will walk us through what he did with that spreadsheet, and right now it's set up with five tiers, but it's subject to change a little bit as we evolve through the conversation. So, one thing that I wanted to ask about real quick is the new programs Cascade employees would start qualifying customers for energy discount rate discounts, and arrearage pledges whether that's complete arrearage forgiveness for some customers and some other approach for higher FPL AMI customers, or you know complete arrears forgiveness of some sort. Do we all agree that the Cascade employees will use a calculator? The same as the agencies to receive the customer self-attested income and household size, and qualify them for assistance, and then have a referral process where we get that information to the Agency so that they can work with the customer on their other programs.

The group agreed we will utilize the tier structure listed below.

T1	0-25% FPL, 0-10% AMI
T2	26-50% FPL, 11-20% AMI
T3	51-100% FPL, 21-40% AMI
T4	101-150% FPL, 41-60% AMI
T5	151-200% FPL, 61-80% AMI

There was general agreement among the group on the following:

- Customer self-attestation of income, HH size, etc.
- Establishing a post-qualification verification process.
- Post-qualification verification process likely to be conducted by the Community Action Agencies.

2. Arrearage pledges and bill discount rates by tier (see Excel attachment) – Chris Mickelson

Corey - Seems to make sense and based on the conversations we've had, but obviously we have to work out the details of exactly what that looks like.

Yochi - With these programs, as we're moving towards self-attestation, I think we're ok with having the utility enroll customers, provided that were also tracking to see how many of those customers that the utility enrolls are able to make it to a Community Action agency appointment for consideration for weatherization, and other services. We're ok with having the utility as an entry point as long as we're continuing to track and still able to get customers through to the CA and track the success of that referral process.

Chris - I thought we had agreement on tiers based off what Avista had and your concern was really tier one and two. You have 0 to 5% FPL, or 0 to 10, or 0 to 25 like we initially proposed. Unfortunately, I can't put FPL/AMI and still have calculations work. I'm showing what Tiers 1 through 5 look like as FPL and tiers 1 through 5 look like as AMI, just visually. The stepper part within this region is that arrears and management based off whatever discount percentages we come up with. I put in these numbers just to help show what calculations are. This is looking at energy discount and the bills, so here's the discount amounts. Here is each of the customer counts for each tier, what their average bill is, and this is at current rates, so that has the latest 25% increase due to the PGA and everything else. He showed what that discount would be, what that post bill would look like, and then ultimately what the cost is. I take that post bill, the average assistance we've been noticing these customers get and what their ultimate account balance would look like. Showed energy burden by tier is before the discount, and what it would look like after. Goal was to set it at 2% realizing 6% is average overall energy burden. But that includes all utilities, figuring natural gas is anywhere from half to 1/3 of that percentage, so I just set it to 2% to get everybody at 2%. He continued to review the breakout. I'm assuming 10% enrollment rate at least for that first year, we average around 2200 a week. If we get 10%, that puts us close to 6000 customers. I think that's pretty good for that first year. Obviously, we need to include agency funding fee. I just put in the current amounts right now, 75 CBO is 3% with the Commission's order of the 73, as that minimum. I have the rate spread as a drop down, so you could select different ways to spread it. So that's kind of a very quick high level. Any questions?

Yochi - I will admit that I did not have a chance to go through it in advance. I just looked at the agenda. It's great that we have these toggles and that we can play with it and see what it would do. You have a 100% discount set now for the lowest tier.

Chris – For arrears management, we haven't really talked about that, but here's the energy discounts of what we would be looking at to get to all the customers to a 2% energy burden.

Lorena - My question has to do with the arrearage management - If the current thinking of CNG is that the arrearage management won't exactly function like a traditional arrearage management

plan, which is, you know where a client is paying so much per month while part of it is being forgiven, it's going to be like an upfront grant based on what the current arrearages are kind of like what you proposed

Chris - I don't know if we came to a full conclusion on that. I think last time we talked, Yochi was interested in seeing the 1/12th approach method. Dan indicated, at least from Cascades point of view, it doesn't really matter if you give 1/12th or all of it up front, but I don't know if we exactly landed on one way or the other.

Dan - I agree we had some good discussion about it, I think, and several other folks shared their thoughts on why the 1/12th for certain income levels is preferred. And then you know the company, I think mostly be shared our perspective online. We think the other approaches is preferred. We didn't make a decision on that two weeks ago. If it's something we need to decide on before we make any decision on the discount percentages, then we could do that today. I don't know how much it would affect the discount percentages, I think we would still go with whatever the right discount percentage is for the customers in each, and I'm sure I'm the arrearage management pledge amount is for each customer based on income level and then if there's 50% leftover, do we require them to pay that 50%? Do we split it over 12 months or do we just give it to them and set up a pay plan or payment arrangement for the rest without stopping that pledge amount. If they don't meet a monthly commitment for the remaining balance would that change the pledge amount for the discount percentage.

Chris - For this calculation, no, it won't impact this analysis whether we do 1/12th or all of it up front. And it doesn't impact the energy burden.

Any thoughts on the tiers or anything else? Yochi - you indicated 4, maybe 5, maybe 6. Last time you were talking this is closer to 5%, like Avista?

Yochi - The reason why I brought up six is because as you may know, PSE is looking at figuring this out now as well. And at our last meeting they proposed 6 tiers, and I think for ease of again understanding amongst customers and perhaps agencies, I was thinking having some alignment between utilities with overlapping areas might be nice. I'm generally comparable with 5 or 6 tiers. Two things to note about the arrearage forgiveness is that you know when Avista set up their program, I believe that they have designed it so that customers up to 50% FPL get 100% of their arrearages forgiven.

Chris - I'm not sure what exactly they give for tiers 3-5, but at least on their presentations they show 100% up to 50. That is what I put in. At least these three are what currently these customers get based off WEA and I put these higher than what they would get from WEA, and it was more just placeholders. These aren't obviously set in stone, but just to start that conversation, so we could see what program costs are and what we would be looking at. It sounds like you're wanting essentially that.

Yochi - I was just pointing out that we've seen that, with Avista. I have to admit I'm interested in hearing feedback from others as well. I don't know that I'm ready to come in saying exactly what I want today having seen this for the first time.

Chris - Any others with some feedback?

Corey - I have to take a closer look at that, but where can find alignment between utilities, even if there's nothing overlapping the service territories. I think that's a good thing. The extent we can be aligned with Avista, I think that's good.

Chris – Where Tier two ends and Tiers 3,4, and 5 are exactly like a Vista. The only difference is their tier one stops at 5% versus 25, and I can make this kind of plug and play. The green areas are where you put inputs or they're a drop down of some sort. So, then you could go in change and it will all flow through. Are we looking to have the first tier to be a much smaller percentage of customers who qualify? Are we wanting to go to 25? Are we able to get agreement on that this go around or do people need more time to analyze and play with this?

Lorena – So, you changed the FPL in the arrearage management and then that automatically is updating stuff down in the energy discount section.

Chris - This automatically calculates where it would be on an AMI basis.

Corey - The longer I look at this I would be more comfortable having the first year being more income inclusive, so 25% makes more sense.

Yochi - So the trade off, I think that we're making here Corey, is if you have a tighter or a smaller first year where, say you're only going from zero to five, you can have a much higher percentage discount for those bills. And, if we're looking to keep that energy burden around 2%, then you're likely to make that first tier bigger, you're likely to have a little bit of a of a perhaps lower discount in that first tier to hit that target energy burden. I've been thinking about this and it could be wrong, but if you have a really small first, you can give those customers in the most need of a really big discount.

Chris - That is correct. I'm trying to keep these towards 2%. And right now, they're getting an energy discount. Obviously, those with very little income, the energy burden is very large and they're still above 10% and so it looks like a 54% would get him back to that 2% range. But you also have a much smaller group of customers, so that it that is the tradeoff of a larger range of smaller discount, a tighter range, a larger discount.

Lorena - To the count of either in the bills or the arrearage section, are those CNG's estimates of how many households will fall into each of these categories currently?

Chris - Yes. Based off our report that we filed initially, when we did an energy discount program, how many customers would fall and what percentage? And this was part of that conversation last time I indicated to Yochi, we couldn't really go down to 5%, but we could kind of make some mathematical estimates to figure out what percentage of these customers fall into that group. Obviously 50% and above was very easy. Likely, low income customers who are in that zero to 25% FPL we figured out what percentage would fall in which group. Same for AMI. We didn't have it so it's harder to go granular on AMI versus SMI. I'd have to go back to the report to find out why exactly, I think it was the systems in which we had access to. Without running this program for a year, you know these are our best guess at this point until we have a year, or two of solid data to know how many customers we would expect in which tier they would fall on a consistent basis.

And I believe we provide that a few times and I even walked you through where some of these came from in previous meetings. But happy to do it again if people would like. We went back and looked kind of historically on average we have a little over 2000 applicants within our WEAF program. So 10% I'm calling kind of that first program year would probably be a good goal. Ultimately, the goal is to get to 100% of a realistic goal is 80%, At least that first program year, 10% seems like a nice goal to try to achieve.

Yochi - As you're talking about the enrollment goals, it makes me wonder if this is comparable. I mean, I know you're not in a whole year in Oregon but where were you at similar levels where you had 2% and do you think you might be getting to around 10% in in your first program you're there?

Chris - Yeah, we're actually getting close to 20% in our program year in Oregon. Our goal was around 4000, last I checked, we were over 3000 customers and we're only four or five months into the program year.

Yochi - Do you know what you were before in your assistance program in Oregon? Was it a similar level to the 2% that you are now in Washington?

Chris - No, it was much lower.

Lorena - Without some deeper thought around it I am thinking a lower FPL also with more of a discount because I'm worried that lumping some of the zero income folks or just really little income, that the 48% may not get them to a comfortable energy burden. That's just my initial leanings.

Chris - It sounds like everybody wants a little more time to play with this to get a sense of where they would feel comfortable.

Corey - One quick clarifying question, the tradeoff comes in the move to get to 2% energy burden other than the energy discount, not the arrearage discount would have to increase because of a lower tier for the arrearage management, is that correct?

Chris - Correct. And what that discount would be is depending on where we're trying to aim for that ultimate threshold. Like I said, I put 2% but you know, the utilities of that 6% energy burden, we're only 3%, maybe that's too much so maybe we want 2 ½. Part of my goal was generate discounts for their arrearage management, I wanted discounts that were equal or larger than we currently have, and then for the energy discount, make it so we get to 2% as an after energy burden while trying to maintain overall program costs to keep those low so. And you'll find out it's hard to juggle all three of those.

Yochi – So when we're looking at an average bill for a customer with that income in that income bracket, right?

Chris - Correct.

Yochi – Looking at people in that tier that are energy burdened and some that are not, and I feel like information we don't have is what is the average bill of someone who is energy burdened within that top tier versus one who is not. Is that right?

Chris - So are you're talking Tier 5? I mean overall this would be the average for all those customers in there. So some will obviously be lower and some would be higher, whether the ones who have

higher bills have lower income. That's hard to say at this point and would be more of a guess after you have the program in place for 3-5 years, then you could probably be able to answer those kind of questions and see if there's changes we would recommend doing at that point.

Yochi - The bill discount would be set at the same amount, whether a customer has arrears or does not have arrears, correct?

Chris – Yes. I'll take one more step back. The arrears, the way I looked at it was, this doesn't come into calculation within their energy burden because I figured this was past due amounts and energy burden is more about your current bills versus your income. And so, yes, this doesn't impact the energy discount. Energy discount is really other assistance, so LIHEAP is applied first, but for me to do it I did it kind of on this particular model, but energy discounts applied 1st and then other assistance. But it still gets you to that ultimate same goal. And so really this is what you would be looking at for these customers with their likely account balance or final bills would be and this is an annual number. All of this is annual numbers so you just divide these by 12 to see what their monthly amount would be.

Yochi - Got it. Thank you. That's very helpful to understand that the energy burden does not include the arrearage grants.

Chris – Adjustment made to 150% LIHEAP, tier 5.

Dan – Let's review the spreadsheet more in the next couple of weeks. Think about it more and it will be another primary topic in 2 weeks.

3. Collection of income and other data by company and agencies – Byron Pfordte

Byron- I guess to start we need to decide on what the goal is for collecting the information that we collect. This would be used for our data fields that would possibly be included in applications and follow up surveys as well, but joining this a little bit late in the game, I'm not entirely clear on the goals that we want to achieve by capturing this information from our customers.

Yochi - one of the primary goals in collecting data about customers that are served is to understand the customers that we are reaching in order to identify if there are customers that we are not reaching, where different or unique types of outreach would be appropriate.

Byron – Are you talking about connecting the dots with somebody filling this out. If somebody fills it out geographically, we can assume that somebody else around them falls into that same category. Is that what you're saying or?

Yochi - We see that we are not serving customers that have a particular demographic type. Then we can think about why we're not reaching those customers and how the program could be designed to reach them and particularly with the focus on equity, I think we want to be able to understand if we are reaching customers that might have a lower education or a particular ethnicity or race, for example, or in a multi generational household. And if we're not reaching those customers and our needs

assessments shows that those are customers who are in need, then we have the information in order to be able to see who we're serving and who we're not and how to how to adjust the program appropriately.

Byron - I have a hard time connecting the dots because these are people that we that are actively seeking assistance and then that's fine. I mean, understanding the people that apply, makes some sense, I don't know how it would be used for outreach for those not seeking assistance. You know, we're looking to outside help to help us identify those customers but for our applications and for our surveys. I do want to keep in mind the goal of what we want to accomplish with these customers and keeping in mind that every question we ask them is going to be a barrier to them applying. So, whether you agree with me or not on that, I do want to get that out there and hopefully that will be in your mind as we go through these data fields and decide what is and isn't necessary to collect from our customers. Right now, as we put this together, we still have on our side some processes to work out. We're exploring options for being able to collect this information and securely collect it. This isn't going to be a quick thing for us unfortunately, but having the pieces and what data we intend to collect is a first step for us in determining how we're going to secure this information. Hopefully everybody had a chance to look at this and I do appreciate any input you have. I'll first off start and ask if there's anything you saw on the table that I didn't include that you feel needs to be included and then we can kind of run through each of these.

Yochi - Before we move on, can we make space for other people to discuss how they anticipate such data being used? I would appreciate hearing some other voices as well.

Byron - Sure.

Lorena - I think one of the obvious ones for me, going back to what Yochi was saying is looking at the enrollment data over time. I think when we have fields such as race and ethnicity and language spoken, that is going to really be able to highlight where we need to do a better job of potentially reaching folks, education level I think is a piece of that as well. Just to try to find those gaps and services and this is the type of analysis that we do at our agency, and cross Community Action agencies is using these data fields to identify gaps and services to know where to focus resources. That's why we collect the data because we're required to by CSBG standards, but then we use that data in order to determine service gaps.

Misty - I was going to say the same thing you just said, but I can also see where some of this information would come in into play when we would be doing auditing of files or income verification of files. And verification of household members and things like that.

Byron - If you do that, then I mean you have to collect that information first hand yourself anyways, correct?

Misty - Correct. But when we are going at that blind we would just get a name won't have anything from the client up front stating what it was that they were telling you guys when they signed up for the program. So there's no way to kind of use that as a guide of what we need to be asking for or even to be able to dig further. It's just helpful to have it from the client then it is to go in blind when you're trying to get that information from someone.

Lorena - I would say an example of that is including things like employment status, disability status, but status that can also help us determine whether there's likely income related to those different composition check boxes.

Yochi - And then I just want to expand on one other thing that we that that was mentioned briefly and that's just that Community Action agencies rely on federal grants for funding and that federal funding requires them to submit this data for customers served. And so, that is one among many reasons why it's good to collect this data as well, and that's not to say that Cascade has to keep all of that data if they don't want to or don't feel comfortable keeping that data.

Byron - So that is one part of the security aspect of it is, you know, not storing this data for a prolonged period of time. And I know RIT Group has no intention of us storing this data for any longer than needed.

Andrew - This is Andrew Roberts with the Commission staff. We had a similar conversation with Avista. The information list was a little bit different, but ultimately, they ended up moving away from some of the information because their system didn't store data to HIPAA standards. So I think that's probably a consideration, I don't know if anything here would trigger that I think I have a bit of a concern with information that's not required for the program or other requirements.

Byron – That is the gray area because for our purposes, I'm aware we're relying on the customer to self-attest to FPL or AMI percentage or even provide their household income, beyond that, to qualify for our programs, we really don't need much more information. And so from the utility side of it, very little of this is needed. I did go to some government sites on best practices, and it said what Andrew said. There is no need to collect anything beyond what is needed and so that's what I'm struggling with from the utility side, as I said, it's very little that we need.

Sylvia - I missed the first meeting so I'm not sure if I'm speaking out of line, but I'm looking at those three bullet points where it says general agreement among the group. On the following, which was what you just talked about, self-attestation, post qualification verification process and all that. So as far as that goes, I mean I'm not sure why we're trying to make work harder for ourselves at the CAP agencies. And then we already have that other information as far as all those data fields to consider when we're helping somebody with LIHEAP and WEAFF, we're gathering that information already. I'm thinking that we've got that information, so it's not going to be something difficult.

Misty - So I'm looking at it from the aspect of, we need this information for the clients that we currently see with LIHEAP and all of that. But what about all of the people that are going to apply for this program who have never received assistance from Community actions before, because they can now we're trying to get them in touch with community actions, who they can get services from, but we don't have any information on these people at all. My point of when you're verifying information instead of going in blind, you have information on a person that you can talk to them that they've filled out the information.

Sylvia - But if the vendor is telling us that this is all right with them, then I mean, if they've already had this discussion with Cascade gas over the phone or however it's going to be, maybe that information can be forwarded to us. If that's what all they require, then why are we making it harder for us, whether

they've been for help or not, they've already discussed this with Cascade natural gas. Why is it for us to go digging more even further into somebody's income or whatever it is or just trying to get a discount on their bill? That's just my opinion, it seems like it's just a discount that whether they've been here or not, they're asking for a discount.

Misty - Right. And is it Cascade natural gases plan or is the plan to allow anybody to get on the rate discount program no matter what they self-attest. Or, are we looking at a verification process to make sure that they do qualify for this program?

Byron - That's what the audit is for the 3% and yeah. So they attest, whatever they say they make when they call is what we qualify them at.

Misty - And then there's supposed to be an audit process with so many files or whatever, or however many whatever that's decided upon type of thing and then if they are found to be over income at that point...

Byron - Then they're removed from the program, but I think we agreed they are removed without having to pay back anything.

Misty - Right. So the information that they're gathering is just helpful in that audit process. That's my way of thinking about it.

Byron - From Cascades side of it, you know our stance is we don't want to collect anything. We don't need for our purposes and in that audit process you're going to have to collect this information from the customer anyway.

Misty - There are some things on there that I agree could be off, but I think there are some really important things on there as well.

Byron - OK. We'll start with you if you want to just kind of point out what you think is definitely needed, that would be of great interest to me. And I'm assuming the group as well.

Misty - So from my agency standpoint, having to do an audit on a file or on a an application, obviously I would say that the applicant, the secondary applicant, the residence address and mailing address, what language they speak in the home, because that's going to give us whether or not I need to have a translator or somebody who can speak their language, call them. Employment status? That's going to tell me they have earned income in the home, I am going to be asking for specific types of income, number of people in the household and an e-mail because you know you're going to want multiple ways that you can contact the person. Obviously the account number so we know what account we're dealing with, the housing type, if that is something that determines a benefit, additional income and sources there. So whether or not a person is on Social Security or unemployment or whatever their income may be, any questions regarding income would be important for us. And then whether they received any other assistance because that could possibly look to whether or not you even have to do an audit on them.

Byron - And for these, I think we said if the customers qualified for LIHEAP and then gets the energy discount, they would be excluded from that audit. I believe that's what we said.

Misty - There's other assistances out there maybe, such as if a person receives food stamps. Then we couldn't potentially qualify them because they've already been income eligible through another social service agency.

Byron - Are there fields here that we just highlighted that you're going to have to ask anyway. I mean, are these helpful to know ahead of time.

Misty - Probably not. I mean, we're going to obviously have to interview the client as well, but having some information ahead of time, the housing status is not necessary.

Byron - That's what I want to accomplish - what information is necessary for us to gather and pass along so if there's any of these that aren't necessary.

Misty - I would say you would probably want to do the household composition though that's necessary so you know how many people are in the house. And who were supposed to be talking to them about?

Byron - Wouldn't that be covered under primary or secondary applicant? Who you're talking about?

Misty - Well, not necessarily, because you have children in the home that, when you have a household of six, you are going to want more than two adults in the house. And are you counting all their income? I would say the phone number.

Byron - I don't know why, but looking at the LIHEAP application, gender was the only demographic data field that was required. I'm not sure why that is, but I found that interesting.

Misty - Lorena, do you know why that's required on LIHEAP? I know it has something to do with the statistics and stuff like that.

Lorena - Yeah, it's required because they're trying to look at how many women head of household, that kind of thing to determine who is getting these services at their federal level. And to that point, I really feel strongly that race and ethnicity should be included and it in it. And just like on LIHEAP and all our other programs, it is a voluntary question, but I really feel strongly that if we don't know who is accessing these programs, we don't know who's missing out on these programs. And that just feels like a loss. So I do feel really strongly about that one and it being a voluntary field like it is in in most data collection, you know situations - the education level, the things related to the household composition like disabled veteran status, though those are also voluntary fields in LIHEAP. Those are not required fields. The required are, first name, last name, date of birth, gender. And then a lot of these are voluntary, not so much the things when we talk about the household type, the housing status - those are household level characteristics rather than individual characteristics. But we're talking about individual characteristics. Much of it is voluntary. And I would propose that they'd be voluntary. And in this application as well.

Byron - I've heard a couple times that we want to be able to use this information to pinpoint underserved and those that aren't served. But that's also the goal of our propensity studies. And so I don't want to forget that that we have other methods for reaching these underserved without creating more of a barrier to those who are seeking assistance.

Misty - I agree with what Lorena said, but I also want to bring this up - are we trying to collect this information on every single person who's in the program, or are we trying to collect this documentation because agencies need it for the people that they're going to be auditing?

Lorena - I am more specifically talking about it as the utility side of the program side being able to say who is and who isn't getting it. I realized that, going back to what you were saying and what Sylvia was saying, for those that do end up coming to the agency, whether it's via the eligibility verification or audit or because they've been referred for arrearage management, we do have mechanisms to collect this data and likely will. But it is easier if it's already on the application that we're required to use. And I feel like to a certain degree we'll be developing that application as for both the amp and for the BDR as part of this because you guys have been reliant on basically agencies create using the LIHEAP HIF agencies using whatever it's not standardized, or if it is it's standardized across lie, cheat, and so I think we're kind of moving away from that is that it's going to have its own application. But going back to what you asked, Misty - I'm thinking about it from the utility standpoint of who is getting served and do agree with you as far as thinking about it from the audit standpoint, where maybe race and ethnicity isn't as important for that standpoint. But some of the other fields are very helpful for when we're cold calling people or cold emailing people who've never worked with our agency before.

Byron - I'm going to highlight this because for our purposes, this is what we require.

Yochi - I will echo what Lorena said. You know, we think that these fields should be voluntary, but that it's important to collect the data. But I think having actual data from customers that are enrolled would be a good additional data point. Having Cascade collect this data also allows us to understand which types of customers are served by Cascade or which type of customers come to cascade to get enrolled in the program and which types of customers come to the agencies to get enrolled in the program? And I think this is going to be valuable information as well. I didn't see on this list, but I thought might be worth collecting, which would be a citizenship status. Need to understand if we are serving non-citizens.

Byron- I'm pretty sure that's a field we don't want to collect. And I mean we can talk about that a little bit more, but I mean for our services and at fear of alienating our customers, I don't think that the utility has any business collecting that information because it brings up all sorts of concerns about when infrastructure projects happen, are we targeting certain territories or group based on citizenship or, we could even do that based on low income or high income areas, you know it's a can of worms that I mean we really don't want to open up.

Lori - Byron, just to tag onto that, I think, there is some legal issues for us potentially, with having to turn that information over and that just opens up a whole set of legal issues that we don't necessarily want to be part of.

Misty - I have a question and forgive me for not knowing this answer, but if these are ratepayers essentially paying for this this program, wouldn't some of this information need to be collected so that in the future, if there were ever any concerns or programs needing to change, we had information to go back and argue points or anything like that. I mean, in rate cases, I would imagine that at some point this program could get large with the amount of people and it's going to cost the rate players more money. And at some point, do you think that they're going to come back and say enough is enough?

Byron- Yeah, I do.

Misty - And then when we need to have information that proves of the people that we're serving.

Byron- I mean we would point to the income data, which is really all we need to say that you know we're reaching the people that these programs are designed to reach. Are arrearages going down, speaking hypothetically, this is what we want to happen. Our past due accounts are down and we're seeing customers paying their bills on time. But in rate cases and lawyer, Chris can correct me, they're not asking for ethnicity of who we're serving or they're Citizenship or any of that?

Corey - Speaking from my experience working on several rate cases across utilities that concern hasn't really come up about knowing who we serve and Byron's point about gathering information about income and knowing that they're serving in customers based on income. In relation to arrearages, that is something that eventually rate payers would have to pay for anyway through uncollectible that would be included in rights as well. So that's something to think about, relative to the other components of build rates. And even as this program grow, the amount collected from each customer is very small compared to the other components of a bill. And I think customers would be more concerned about the company. For example, requesting too much money to cover various investments - that sort of thing is going to be a much bigger part of the bill.

Byron - Any other comments? We are quickly running out of time and we still have to get to a couple more pieces here. I will save this. As I said, I mean we are still several, several steps away from being able to collect this information securely anyways. But for those working on methods of securely collecting this they are interested in what we want to collect. So there is a little bit of urgency and making sure that I'm able to get these data fields to them. But at the same time, I don't want to exclude or include anything that that isn't needed, and I think this is a good starting point for me to share with that team.

Yoshi - Before we move on, if I could just say, I feel like it was pretty ad hoc as you were going through and highlighting those data fields and before the conversation is finished, I think it would be go be good to go through and kind of more comprehensively discuss each one that you know that, that that hasn't been highlighted. So that group members can express their preference and explain how it may or may not be used?

Byron- Yeah, I'm not setting anything in stone right now, and I do need to be respectful of everybody's time. We can talk about this, and we can set that for our next meeting as another topic.

- Data Fields to Consider (compiled from LIHEAP, PSE, Avista, and CNGC applications)

Primary Applicant Name	Secondary Applicant Name	Residence Address	Mailing Address
Marital Status	Language Spoken in Home	Ethnicity/Race	Employment Status
Phone (primary)	Gender	Date of Birth	Number of people in Household
Email	Account Number	Housing type	Time at Residence
Education Level	Household composition (ages, gender, employment status, disabled, vet, etc.)	Housing Status (own, rent, etc.)	FPL, SMI, AMI, HHI

Average Monthly/Annual Energy Costs	Additional Income Sources	Energy Type	Do you currently have a payment arrangement?
Have you applied for/received assistance in the last 12/24 months?			

4. Set key topic(s) for 2/15/23 full Advisory Group meeting – Byron Pfordte

Discuss CBO Program structure

5. Set key topic(s) for next meeting – Byron Pfordte

Customer Data Collection

Tier Structure

List of program design topics agreed to by group:

- Arrearage Management and Rate Discount Design
 - Design of income-based tiers
- Joint administration between utilities and community action agencies (CAA)
 - Ensuring utility-enrolled customers can access other services, including LIHEAP, weatherization, childcare, rental, banking, water assistance, etc.
 - Tracking number of customers enrolled by utilities that proceed to CAA intake.
 - Information sharing, i.e., individual customer demographics provided to CAAs.
- Enrollment
 - Self-attestation of income/HH size
 - Audits for verification
 - Type of income, length of enrollment, processing changes in income, time to provide documentation, selecting customers for audit, etc.
 - Use of categorical eligibility to either very incomes or enroll customers.
- Utility and CAA design a joint communication plan documenting:
 - Program launch, informing customers they are selected for audit, informing customers they are not income-qualified, and responding to media inquiries about eligibility and fraud.
- Managing overlap between LIHEAP and bill discount program; developing a plan to maximize use of federal funding.
- Reporting

February 17, 2023

Ms. Amanda Maxwell
Executive Director and Secretary
Washington Utilities & Transportation Commission
621 Woodland Square Loop SE
Lacey, WA 98503

Regarding: UG-210755 Compliance Filing to Commission Request for Updates to Advisory Group Pursuant to Order 09

Dear Ms. Maxwell:

In compliance with Paragraph No. 78 of Order 09 in Docket No. UG-210755, Cascade Natural Gas Corporation encloses for filing the minutes from its February 15, 2023, WEAFF Small Group Advisory meeting. The following documents are submitted electronically as part of this filing:

- UG-210755-WEAF Agenda-2-17-2023.pdf
- UG-210755-WEAF Agenda-Transcript-2-17-2023.pdf

If you have any questions, please contact me at 208.377.6015 or Chris Mickelson at 509.734.4549.

Sincerely,

Lori Blattner

Lori Blattner
Director, Regulatory Affairs
Cascade Natural Gas Corporation
8113 W. Grandridge Blvd.
Kennewick, WA 99336
Lori.blattner@intgas.com

Attachment



WEAF Advisory Group Meeting
February 15, 2023 2:00 – 3:30pm Pacific

Welcome and roll call – *Byron Pfordte*

Advisory Group Member	Contact
Blue Mountain Action Council	Sylvia Schaefer
Community Action Connections	Dalia Ochoa
Community Action of Lewis, Mason, & Thurston Counties	Dale Lewis, Sandra Koch
Coastal Community Action Program	Debbie Gregg
Chelan-Douglas Community Action Council	Vern Gurnard, Kristi Hills, Alan Walker
Kitsap Community Resources	Kandi Balandran
Lower Columbia Community Action Center	Deanna Dahlberg, Kathy Bates
NW Community Action Center	Jose Alvarez, Todd Hilmes
OIC of Washington	Heidi Silva, Casandra Ochoa, Candi Jaeger
Opportunity Council	Marie Stangeland, Lorena Shah
Community Action of Skagit County	Misty Velasquez
Snohomish County Human Services Dept	Constance Hockett, Manu Morgan, Sarah
WUTC Staff	Heather Moline, Andrew Roberts, Andy Sellards
The Energy Project	Ross Quigley, Yochi Zakai
Public Counsel	Corey Dahl
NW Energy Coalition	Charlee Thompson
Department of Commerce	Michelle DeBell
Cascade Natural Gas	
Mark Chiles, VP of Regulatory Affairs & Customer Service	Lori Blattner, Dir Regulatory Affairs
Dan Tillis, Dir Customer Experience	Chris Mickelson, Mgr Regulatory Affairs
Byron Pfordte, Mgr Customer Experience	Noemi Ortiz, Mgr OR Conservation & Weatherization
Shannon Steed, Consumer Specialist	

1. Company update – *Byron Pfordte*

Pfordte, Byron - I don't have a whole lot to share. I do have a series of emails and I'm not entirely sure who all was included on those, but there is going to be a focus on developing the EDP program ahead of AMP program, we've agreed to that and so the focus will be on that discount program. Chris has been addressing questions around the calculator and I want to encourage anyone who hasn't recently read through the low income needs assessment that we provided, to do so. It addresses several of the questions that have been submitted surrounding the calculator, so it may be something good to review as we continue to develop that. Outside of those updates, I don't have anything else unless there's questions from the group for the company. No, then I will turn it over to Lori.

2. Small group meeting update – *Lori Blattner*

Blattner, Lori – Chris is actually going to provide the small group meeting update today.

Mickelson, Christopher - If I mischaracterize anything or forgot something from our small groups, those who were part of those meetings, please chime in. But basically, over the last two small group meetings, we agreed to a tier structure where it reflects FPL and AMI. We are still discussing the tier breaking points, but I think for at least a couple of the tiers we pretty much have those finalized. It is more the lower tiers where we're deciding where those breaking points should be. We also came to a general agreement on customer self-attestation of income and household size, establishing post qualifications verification process, a post verification process which would be conducted by the Community Action agencies, and the company being allowed to qualify customers for these programs. That was the general discussion and agreements we had back in our January 25th small meeting. Then, last week for our February 8th small meeting, the calculator, as Byron referred to, was actually a financial model showing what pledges, bill discounts we would be looking at and what the overall cost and participation would likely be. It's still a model that was provided only to the small group, but we're willing to share that with this larger group if need be. Once we do have a final version, obviously I'll be sharing it with this larger group, but we're still in the midst of that process. As Byron alluded to, there has been a few emails asking about questions related to the model and some of the calculations, which is all based off that low-income assessment analysis report. The other aspect we talked about last week was the collection of income and other demographic and customer data.

We are still discussing that, but to give you some idea of what those were; some of the fields we were considering was language spoken, gender, account of housing type etc. I think we've got a few of them ironed out, but there's still more discussion to be had. As we come to a general agreement and conclusion, we will bring that to the larger group. Any questions? None

3. Unresolved items from the previous meeting – *Byron Pfordte*

- a. The additional 25% WEAf grant has been applied to account

Pfordte, Byron - If I'm recalling correctly, this was presented in our last meeting that we did apply the 25% WEAf and grant an additional 25% retroactively to the accounts.

- b. An additional grant to reach \$125 minimum have been added to accounts per Misty's request

Pfordte, Byron - We retroactively went back and applied additional funds to those who did not get the \$125 minimum applied to their account. So those have been taken care of. I believe Shannon notified the agencies of the accounts that were adjusted.

4. Update on new program design focusing on agency impacts – *Byron Pfordte*

- a. Propensity Model by Forefront Economics and estimated completion time

- i. Mark Thompson from Forefront Economics to join future meeting to discuss

Pfordte, Byron - I don't have an estimate for the completion time for the propensity model from Forefront Economics for Washington. I know that they're focusing on Oregon right now. Dan has been in more communication with them than I have – I should have reached out to him for more information, but I don't have an estimated completion date unfortunately. I apologize for that, but I think he will be here for our next Advisory group meeting. At some point, Mark Thompson from Forefront Economics will present on the propensity model and the needs assessment for Washington that they're conducting for us. Any questions on that? Obviously, the goal is to help us identify customers that would have a tendency or need to enroll in these programs, but for whatever reason have not. Also, allowing us to identify and target them with specific communication and outreach opportunities.

Yochi Zakai - Thanks, Byron. When you send out the notes from this meeting, could you perhaps include an estimated completion time for that?

Pfordte, Byron - Yes. No other questions.

5. Dedicated discussion of an agreed upon topic – *Byron Pfordte*

a. CBO Program Development

i. Use of funds

Pfordte, Byron - There were some emails that went around outside of this meeting, proposing some points on how the program should be developed and I believe it was proposed that the \$73,000 annual budget be provided to the CAA's and they control the outreach for for, and to, CBO's and the compensation would be for those outreach efforts – not tied to referral fees. In speaking internally, I don't think there has been any objections to that method, there would need to be, from our needs,, diligent reporting on activities to support the CBO. We'd like quarterly reporting on pledges received and compensation awarded. And, if it comes to it, a plan for unused funds, but I'm all ears and open to any suggestions on the direction for how this CBO program should be developed and administered. I will open it up for anybody's comments.

Yochi Zakai - I can chime in. I put the e-mail that I sent around earlier into the chat so folks would have it handy. Basically, the company would offer grants to CAA's that are interested. They could use that to perform outreach to community-based organizations, and then contract those community-based organizations to perform outreach programs, letting customers know about energy assistance. I'm really excited about this program and excited that we're talking about it. I reached out to many of the CAAs in advance to see who would be interested in participating in the program, and so far, I've heard back from Misty at Skagit and Lorena at Opportunity Council. They are definitely interested in learning more and seeing if they could participate. I don't think we should limit it to those two, but that just goes to say that I don't think we would expect every CAA to participate, but perhaps just more of a limited number of those that self-select, as interested. Lorena - do you want to add anything else?

Lorena Shah - I'm glad you teed up that conversation. Like Yochi said, we as an agency are very interested in this. We've been doing a little bit of this work with our rental assistance programming, which was a different way of working with the CBO's. The main points from our agencies point of view, for it to be viable is that there are funds to contract to those CBOs in order to support their capacity to do outreach, and to potentially bring people to the programs. Also, that there is sufficient capacity within whatever contracts, a certain level of FTE to be devoted to managing those contracts, and convening those CBO's together, learning from each other and going out to their location. This is not as simple as sending out subcontracts and subcontracting out all the money. We do need to retain funds to do a good job of subcontracting out because the expertise obviously lies with us on energy. And it's just really important that the agencies that do opt in, have FTE devoted to really do a good job on this type of outreach, and that there is also money to share with the CBO. So, we are paying for their knowledge and expertise in their communities that they serve. I would add just one note about thinking about what CNG is thinking regarding how many people are you signing up for the programs, I would say yes that is something we would also agree with. But, especially for folks that are new to this work, that there is definitely time that's needed to build these relationships for them to be really productive relationships. We still don't have the right recipe even in in Whatcom County all the time, a lot of times there are programs that don't quite fit the needs of the community. You're trying to advocate for the programs and for the benefits of the programs to a group of people who are kind of skeptical of your

programs. -UPDATE - Chris just sent me a message and he had the answer Yochi's question regarding when forefront is estimating to be done in Washington with their study, and it's at this time, it's mid-June.

Pfordte, Byron - Obviously having some experience, probably more experience than most of us on this call, we will likely bend your ear quite a bit on setting some goals and how to best administer this project, but I think you know the goal is to grow it so that there are more agencies involved. I think it would be good whether you plan to opt into this program initially or not, to still voice your concerns or offer your ideas in developing these programs so that it is something that, you know every agency need and capability I think is a little bit different. If we can make it as easy and uniform as we can across all the agencies, I think that would be beneficial. So please don't hesitate to speak up on this topic as, hopefully, it will be something that you utilize.

Pfordte, Byron – Lorena – to get a baseline of what to expect and make this program more successful, can you provide any insight as to realistic goals, enrollment goals?

Lorena Shah – I definitely would want to give some more thought to it but I would say I think it will definitely depend on the size of the organization that one would be working with, and what they're reach is into the community. It may be that there is different types of goals or different metrics for different types of organizations, or different sizes of organizations. I'm not sure a straight sort of percentage would work. I have to give that more thought. I would say when we're talking about some of our most vulnerable people, like it's a win to get a small handful of those who have been so disconnected from these types of services, even though it's a relatively small amount – those are really big wins for us. One example is we work with the hearing speech and deafness center here in Bellingham, and there's, to be frank, not a ton of folks that are deaf in our community. They serve a rather small group, but these folks are so disconnected from mainstream society that the benefit of bringing in such a valuable resource, whether it's rental assistance, or a bill discount rate. So, I just want to be mindful of even small amounts of increases to me as a win because we are connecting some of the most disconnected folks in our communities. But I know that doesn't really answer your question. I think I'd have to think through that because it depends on how many gas accounts we have, knowing those that you're serving and that kind of thing to come up with some sort of formula for determining what's a reasonable goal for those different types of CBO. Another example we work with is a group that works primarily with farm workers, which I know OIC is on here and you guys are going to have probably loads more experience with this than us, but this group that provides promotoras to those communities, like many of them, are in housing that this type of service isn't going to really work. But there may be a portion of those that are in housing that do have gas bills, so it's kind of trying to make some guesstimates on out of your 200 people you serve, who is seemingly going to be a fit for this, and of those, how many do we think we could enroll?

Pfordte, Byron - Maybe for enrollment goals we table that for a little while as it may paint a clearer picture of what our goal should be as we address the types of outreaches and then also how many agencies are going to participate in this program? And so, with a \$73,000 budget are there any ideas for outreach to the CBO's and then any light that can be shed on how the CBO can be assisted in their outreach with those funds. I'll also ask if there's any issues with providing detailed reports on a regular basis, at least quarterly, on these activities and what compensation has been or what amount of the funds have been used for outreach, and how they've been used?

Lorena Shah - I do think that your quarterly reports of some sort are totally reasonable. We require that in the types of outreaches that I'm doing with CBOS's right now. We have some templates that we modify for each type of different outreach, with our current funding that we're using to support them with, we're doing a flat amount each month to those organizations for outreach and have included in their scope of work the type of outreach we're expecting. We're not doing cost reimbursement, which is harder to manage, we are doing cost reimbursement in the sense that the work happens, then we pay, but we're not billing. They're not sending in expanded general ledgers to us. And we only pay the amount they that they actually spent on the program. We are paying them flat monthly rates, as low as \$1000 for one of my programs and then upwards from there with rental assistance, which is a far bigger program and was fairly robustly funded for this work. Those contracts are bigger but ideally it would be, here's the scope of work, these are the types of activities, this is what you're going to report on, and we're going to give you a flat amount each month to accomplish that work. I don't know if that is something for CNG to consider, but from my perspective, which has worked out the best and it's the cleanest.

Pfordte, Byron – You're receiving outreach info from the CBO and then you're distributing that flat fee?

Lorena Shah - Correct.

Pfordte, Byron - And you're not requiring any sort of detailed report as to how it's spent. Is that correct?

Lorena Shah – Yes.

Pfordte, Byron- So, is there any measurement for your return on that that flat fee?

Lorena Shah- The quarterly reports then give us both narrative and numeric information on what was accomplished.

Kristi Hills (Guest) - I just wanted to chime in for Chelan Douglas Community Action Council. We also engage in contracts with what we consider our buying for partners, so they reach segments of the population, maybe a little better than we do at times. We trust them with the communications and pay them also for their work in a similar way that was just being talked about. We don't track the level of detail like how many applications were completed. We feel like that level of detail is not as beneficial as getting the word out, so our partners spend the time getting the word out. The kind of tracking that you maybe would be hoping for like the actual results are just going to be a little bit harder to track in this model. But we know through some of our programs like the eviction Rental Assistance program for example, we have no doubt that the outreach our partners are doing is effective just sheerly by the numbers of people who come through the door for that service.

Pfordte, Byron – Any idea how our eventual energy discount program and arrearage management program would fit into the presentation that the CBO provides to potential customers? I'm asking out of pure ignorance as I've never really experienced how outreach efforts and programs are prioritized. Anybody have any idea that can kind of educate me on that a little bit?

Kristi Hills (Guest) - Some of our clientele really works best by verbal communication as opposed to written communication. So, knowing who our partners are, for example, a small nonprofit close to us has regular in person, verbal communication with the Hispanic population around here.

So, we can share with our partners a particular message for quite some time. It's about rent and now it's switching to the working family tax credit, we just asked them to change their messaging for us. And sometimes it's about informing of the ramping down and closing out of a program, sometimes it's about the time frame, but the partner is here for us; what our needs are for the messaging and then they change the messaging as we need them to. When they have these conversations with others, they will hand out the flyers and things like that that we produce as well, and that's always nice. They include us in social media of their own. They make efforts in other types of media as well. So, it's just that extended reach that they have and those are partners that we have really solid relationships with already. They just talk to some of our customers more regularly if that makes any sense.

Pfordte, Byron - Absolutely.

Mickelson, Christopher - Within Cascades last journal rate case, the Commission, within its order established a pilot program for the CBO funds, and they gave us three years, but they expect to see results. So, kind of getting back to the previous question Byron asked about maybe more detail, I think we may need that to show results, otherwise we're not going to have a lot to be able to show the Commission. Something to consider as we design this.

Kristi Hills (Guest) - Is this coming down from CETA, also is it what other utilities do?

Mickelson, Christopher - This was specifically for Cascade within our general rate case order. So, I don't know if there was something else that may also impact this.

Lorena Shah – I do think between the company and those of us that may be interested in in taking up this pilot, we can show reach efforts. I'm trying to remember all the metrics we are collecting through our quarterly report, though I would agree with Christi, we are also working with our CBO's as well. Some of that also depends on how people are signing up, CNG may want to consider a field on how people learning about this. But I feel like we could come up with some interim level of metrics that would hopefully make the Commission feel comfortable that these funds are accomplishing something. We don't want to lean on straight enrollments because there's a lot of preparatory work and other work that that happens, that is useful and beneficial to count as well.

Mickelson, Christopher - I understand completely. I just wanted to bring this up because this is a three-year pilot, at which point I assume Cascade will have to go back to the Commission show the results, whatever that may be, as we've designed it, to continue the program. Otherwise, if we don't really have anything we can truly show result wise, I could see three years from now they say well that was nice of you, you're no longer funded for this program. I'm just throwing it out there, just something to consider as we do design the CBO program.

Kristi Hills (Guest) - Will there be a time that this group will be able to see what those benchmarks are? Well, the outcomes that you're trying to achieve that the Commission is trying to see realized. Will we be able to see what that looks like to maybe start getting a little more creative about how we could demonstrate.

Mickelson, Christopher - The Commission is in a process of performance-based regulation and there could be some benchmarks we want to try to tie in, there's some equity and marginalized communities that were supposed to try to reach there. So maybe we'll try to use some of those benchmarks, but overall, the Commission said; Cascade work with the advisory group to come up with a process and

design for this program that provides results in essence. I think most of the benchmarking is kind of what we feel we can get, that's not an overly administrative burden, both to agency, CBO or the company and kind of go from there.

Kristi Hills (Guest) - Great. Thank you. I would agree with what was said earlier, I think that we can be creative enough to come up with some outcomes as long as we're really understanding what they are. You know, we're pretty small here and as far as our reach with your services, high electricity here and less of the Cascade natural gas, but there is probably a percent or two here and we just have a hard time getting to them but would love to be a part of being creative to help you with this.

Pfordte, Byron – From what Chris has shared about the performance based regulations that the Commission is looking for, they definitely have details tied to low-income customers and a big part of that is enrollment, specifically arrearage management plans and reduction of arrearages. So obviously the programs we develop here have a huge impact on both those metrics. In my thinking, those are the sort of metrics that they're going to be looking for to justify the effectiveness of these programs. I know that Yochi said he sent an e-mail out and only heard from I think Misty and Lorena as far as interest in participating at least initially in this CBO program. While we have, I believe most agencies represented on this call, are there any others that would be interested in participating in this program?

Kristi Hills (Guest) - I'd say Chelan Douglas has some interest. The initial presentation got us a little nervous because the administrative burden seemed pretty high, but I think the open conversation here helps for us to be a little more open to it, so I'd say we have some interest.

Sylvia Schaeffer - This is Sylvia with Blue Mountain Action Council and I agree with Christy. I think we would be interested as well.

Lorena Shah - Byron, what is the time frame on this initial \$73,000? Is this for the whole three years we would be expected to contract or is this like a year one budget?

Pfordte, Byron - It is annual.

Lorena Shah- OK, starting in September or in October, or at any point, we get this up and going?

Mickelson, Christopher - It is actually tied to our annual WEA program budget year, so start October through September.

Pfordte, Byron - I think with four or five agencies at least initially interested would be a good test group to get this off the ground. Would perhaps give a little more leeway in budget and coming from a marketing background I know that it takes a lot of trial and error and testing to find the right formula to reach customers, so we have a little bit of room to fail, which is not a bad thing.

Kristi Hills (Guest)

One question, just wondering if the agencies who are interested do agree, will we get some help from Cascade natural gas identifying, perhaps who to send mailers to or will that not be an option?

Pfordte, Byron - We will support how we can, and I think through the propensity study we will hopefully be able to identify and provide some targeting for outreach efforts for CBOs in those areas to connect with.

Pfordte, Byron – Knowing some of the metrics we need to receive, the hurdle to receiving detailed metrics about enrollment and applications, if it comes down to the Commission wanting to know quantities of applications and specifics about outreach conducted by the CBO's, are there any concerns that that will be an issue getting that information? No concerns.

Pfordte, Byron

Just for the record. Can I get agreement? I guess verbally or in the chat, if there are any issues with moving forward with the \$73,000 annual budget for outreach, for the CBO, just so we have it on the record? Or better to ask is there agreement on that with the above caveat? Full agreement.

Lorena Shah - Agreeing, as long as we can collaboratively develop those metrics, which was my only caveat.

Pfordte, Byron

And if those metrics do include quantity of applications generated by the CBO. You don't see that as an issue though, correct?

Lorena Shah - No, just more setting reasonable goals around it. But I think collecting it should be fine. In most cases, we may miss some if they are signing up in a different way. But that is something to think through too.

Kristi Hills (Guest) - I guess I would add to that too - If it is the same dollar amount across the board with the same expectation for the metrics across the board, we would be challenged with that in our area.

Pfordte, Byron - We would need to consider the demographics and geography of each of your areas and adjust goals accordingly. I don't think there can be a one size fits all for each of these CBO programs and outreach efforts from each agency. If anybody feels differently or disagrees, let me know.

Kristi Hills (Guest) – Okay, great, I think unique goals would be really important. I appreciate that you've acknowledged that. Thank you.

Pfordte, Byron - I don't think we had anything else on the agenda. I will open it up just to see if there's any general comments or questions.

Mickelson, Christopher - Our next large advisory group is March 15th. And of course, we will have two small advisory group meetings between then, so hopefully that next large meeting will come back with what our energy discount tiers are, percentages and maybe even show you some expected enrollment levels and things of that nature. We may even have demographic and customer information that we have decided on at that point. If not then, obviously that will get rolled to the next large meeting.

Pfordte, Byron - Topics for the next discussion or next meeting? I think it would be safe to add the tiers, the demographic, or at least data fields for our applications and surveys, and then I think we should probably continue discussing the CBO program. There is such a difference from one agency to the next, and the customers in the areas that you serve, we will need to rely on you for realistic metrics and goals for your agencies in this CBO program. So if you voiced interest in participating in that program please think about some realistic goals that can be achieved through that program, knowing the budget and your agency capabilities and we can we can discuss those and hopefully form some sort of plan for

measuring goals for each of you, and then collaboratively what the whole program goal can be. Meeting adjourned.

0:0:0.0 --> 0:0:18.790

Steed, Shannon

Hi everyone, this is Shannon Steed. I'm the consumer specialist for Cascade natural gas and welcome to our February full Weave Group meeting. And as always, this meeting is being recorded. So just to make you aware of that. And So what I'll do is I'll go ahead and share my screen and then we'll start with the roll call. So we can begin one moment.

0:0:25.240 --> 0:0:27.230

Steed, Shannon

I believe you should be able to see the screen. Is that right?

0:0:31.300 --> 0:0:31.700

Pfordte, Byron

Yes.

0:0:32.310 --> 0:0:33.240

Steed, Shannon

OK. Thank you.

0:0:34.270 --> 0:0:41.420

Steed, Shannon

So when I call your agency, please introduce yourself so your Members that are with you there and we will start with Blue Mountain Action Council.

0:0:42.280 --> 0:0:47.450

Sylvia Schaeffer

Hi, this is Sylvia Schaefer. I think Estella Avalos is supposed to be on, too. Thank you.

0:0:48.250 --> 0:0:48.930

Steed, Shannon

Thank you. So yeah.

0:0:49.510 --> 0:0:50.920

Steed, Shannon

Community Action connections.

0:0:52.360 --> 0:0:55.720

Dalia Ochoa

I Shannon, this is Dalia with Ben Franklin, CAC. It's just me.

0:0:56.220 --> 0:0:56.810

Steed, Shannon

My dalia.

0:0:57.440 --> 0:1:0.390

Steed, Shannon

Community Action of Lewis, Mason and Thurston counties.

0:1:6.900 --> 0:1:7.280

Steed, Shannon
Also.

0:1:5.610 --> 0:1:9.920

vern gurnard (Guest)
It's Chelan Douglas County Community Action, Vern.

0:1:11.740 --> 0:1:12.450

Steed, Shannon
Thank you very.

0:1:13.650 --> 0:1:16.260

Steed, Shannon
Anyone else from Chelan Douglas Community Action Council?

0:1:19.280 --> 0:1:23.280

vern gurnard (Guest)
I'm not sure because uh, they had a executive meeting too, so.

0:1:24.670 --> 0:1:25.30

Steed, Shannon
OK.

0:1:24.260 --> 0:1:26.770

vern gurnard (Guest)
Think of my just me, be me today you're stuck with.

0:1:27.440 --> 0:1:28.940

Steed, Shannon
Yeah, that's alright. Thank you, Vern.

0:1:30.870 --> 0:1:33.260

Steed, Shannon
Let's go back one coastal Community Action program.

0:1:38.550 --> 0:1:39.980

Steed, Shannon
Kitsap Community resources.

0:1:46.810 --> 0:1:48.790

Steed, Shannon
Lower Columbia Community Action Center.

0:1:54.10 --> 0:1:55.750

Steed, Shannon
Northwest Community Action Center.

0:1:57.890 --> 0:1:59.620

Jose Alvarez
This is Jose from NCAC.

0:2:0.450 --> 0:2:0.920

Steed, Shannon
My house.

0:2:2.140 --> 0:2:3.230

Steed, Shannon
Oh, I see a Washington.

0:2:10.940 --> 0:2:11.930

Steed, Shannon
Opportunity council.

0:2:12.850 --> 0:2:14.520

Lorena Shah
Lorena and Marie are here.

0:2:15.350 --> 0:2:15.940

Steed, Shannon
I welcome.

0:2:16.930 --> 0:2:18.740

Steed, Shannon
Community Action of Skagit County.

0:2:25.250 --> 0:2:27.320

Steed, Shannon
The home Ish County Human Services department.

0:2:33.360 --> 0:2:34.570

Steed, Shannon
We UTC staff.

0:2:37.920 --> 0:2:39.300

Brewer, Molly (UTC)
Hi, this is Molly here.

0:2:40.160 --> 0:2:40.740

Steed, Shannon
I Molly.

0:2:41.470 --> 0:2:42.640

Roberts, Andrew (UTC)
And this is Andrew Roberts.

0:2:44.170 --> 0:2:44.670

Steed, Shannon
I-100.

0:2:47.660 --> 0:2:48.750

Steed, Shannon
The energy project.

0:2:53.20 --> 0:3:11.990

Yochi Zakai

Good afternoon everyone. I guilty Zakai with the energy project. I let some of you know in advance, but I'm gonna have to leave for another meeting at 2:30. But if it only lasts for the schedule tap hour, I will return. If you all are still meeting. So sorry about that.

0:3:13.200 --> 0:3:13.740

Steed, Shannon
Thank you.

0:3:14.810 --> 0:3:15.600

Steed, Shannon
Public counsel.

0:3:24.590 --> 0:3:26.40

Steed, Shannon
Northwest Energy coalition.

0:3:27.990 --> 0:3:37.900

Charlee Thompson

Hi everyone, this is Charlie Thompson with the Northwest Energy Coalition and really quickly Cory doll from public counsel should be joining around 2:30 today.

0:3:38.740 --> 0:3:39.390

Steed, Shannon
Hey, thank you.

0:3:39.910 --> 0:3:40.220

Charlee Thompson
Umm.

0:3:40.940 --> 0:3:42.170

Steed, Shannon
And Department of Commerce.

0:3:43.500 --> 0:3:46.780

DeBell, Michelle (COM)
Michelle DeBelle here from the Department of Commerce. Hello.

0:3:47.400 --> 0:3:48.450

Steed, Shannon

Time. Michelle, welcome.

0:3:49.890 --> 0:3:51.920

Steed, Shannon

And our staff from Cascade Natural gas.

0:3:55.620 --> 0:3:58.540

Pfordte, Byron

Barn Fortes here and uh Shannon, did you see?

0:3:59.800 --> 0:4:3.70

Pfordte, Byron

That Kristi hills with Shane Douglas.

0:4:3.790 --> 0:4:4.210

Pfordte, Byron

Umm.

0:4:6.440 --> 0:4:7.580

Pfordte, Byron

Message that she's here.

0:4:8.740 --> 0:4:10.450

Steed, Shannon

I did not, but I see that now. Thank you.

0:4:8.950 --> 0:4:12.340

Pfordte, Byron

As well as Sarah with a Snohomish.

0:4:12.880 --> 0:4:13.800

Steed, Shannon

And Sarah, OK.

0:4:18.510 --> 0:4:19.270

Mickelson, Christopher

Chris Mickelson.

0:4:18.850 --> 0:4:19.400

Blattner, Lori

Shannon this.

0:4:20.80 --> 0:4:22.570

Blattner, Lori

Yep, Lori Blattner other cascade.

0:4:26.0 --> 0:4:28.380

Steed, Shannon

Alright, thank you. And I think I heard Chris as well.

0:4:29.700 --> 0:4:40.120

Steed, Shannon

And I know that Dan had to miss today's meeting for another commitment. So I believe that's all of us. Is there anyone on the line whose name I didn't call other than Sara or Kristi Hills?

0:4:40.850 --> 0:4:43.890

Hockett, Constance

Uh. Constance Hockett with Snohomish County energy.

0:4:44.550 --> 0:4:45.180

Steed, Shannon

I, Constance.

0:4:45.680 --> 0:4:46.30

Hockett, Constance

Thank you.

0:4:48.930 --> 0:4:49.660

Steed, Shannon

Anyone else?

0:4:57.490 --> 0:5:3.0

Steed, Shannon

Alright. Well, thank you everyone for being here. With that, I will turn this over to Byron for our company update.

0:5:5.210 --> 0:5:14.870

Pfordte, Byron

Thanks, Shannon. I don't have a whole lot to share. I I I do have that you know through a series of emails and I'm not entirely.

0:5:15.720 --> 0:5:21.270

Pfordte, Byron

Ohh sure, who all was included on those, but there is going to be a focus on developing the EDP program.

0:5:21.870 --> 0:5:28.620

Pfordte, Byron

Or um ahead of AMP program, we've agreed to that and and so the focus will be on that discount program.

0:5:30.440 --> 0:5:39.690

Pfordte, Byron

And I, Chris has been addressing questions around the calculator and I just, I do want to encourage anyone who hasn't or hasn't recently.

0:5:41.90 --> 0:5:45.270

Pfordte, Byron

Read through the Lena the low income needs assessment that we provided.

0:5:46.450 --> 0:5:54.720

Pfordte, Byron

It addresses several of the questions that have been submitted surrounding the calculator, so it may be something good to review as we continue to develop that.

0:5:56.540 --> 0:6:2.710

Pfordte, Byron

Outside of those updates, I don't have anything else unless there's questions from the group for the company.

0:6:11.700 --> 0:6:13.670

Pfordte, Byron

No. Then I will turn it over to Lori.

0:6:19.340 --> 0:6:24.430

Blattner, Lori

Everybody, I'm not Chris's actually gonna provide the small group meeting update today.

0:6:25.820 --> 0:6:26.150

Blattner, Lori

Thank you.

0:6:27.660 --> 0:6:57.250

Mickelson, Christopher

Yep. And by the way, if I mischaracterize anything or forgot something from our small groups, those who were part of those meetings, please chime in. But basically over the last two small group meetings, we kind of agreed to a tier structure where it reflects each tier would reflect FPL and AMI. We're still discussing where those.

0:6:58.10 --> 0:7:0.420

Mickelson, Christopher

The tier breaking points are.

0:7:1.790 --> 0:7:31.800

Mickelson, Christopher

But I think for at least a couple of the tiers were maybe pretty much have those finalized. It's more the lower tiers where we're deciding where those breaking points should be. We also came to a general agreement on customer, self attestation of income and household size, establishing post qualifications verification process, a post verification process which would be conducted by the.

0:7:32.680 --> 0:7:38.230

Mickelson, Christopher

Community Action agencies and also the company being allowed to.

0:7:40.340 --> 0:7:50.380

Mickelson, Christopher

Qualify customers for these programs, so that was kind of the general discussion and agreements we had back in our January 25th.

0:7:51.200 --> 0:7:56.870

Mickelson, Christopher

A small meeting and then last week for our February 8th small meeting.

0:7:58.890 --> 0:8:6.20

Mickelson, Christopher

The calculator, as Byron referred to, was actually a financial model, kind of.

0:8:6.280 --> 0:8:27.350

Mickelson, Christopher

Edge showing what pledges and build discounts and kind of showing what discounts we would be looking at and what the overall cost and participation would likely be. It's still it's a model that was provided only to the small group but willing to share that with this larger group if need be.

0:8:27.930 --> 0:8:47.770

Mickelson, Christopher

And once we do have a kind of final version, obviously I'll be sharing it with this larger group, but that we're still in the midst of that, as Byron alluded to, there's been a few emails asking about questions related to the model and some of the calculations.

0:8:48.310 --> 0:8:55.60

Mickelson, Christopher

Uh, and which is all based off that low income assessment analysis report.

0:8:56.310 --> 0:9:1.740

Mickelson, Christopher

The other aspect we talked about last week was the collection of income and other.

0:9:2.340 --> 0:9:2.690

Mickelson, Christopher

Uh.

0:9:3.990 --> 0:9:6.250

Mickelson, Christopher

Demographic and customer data.

0:9:6.890 --> 0:9:16.440

Mickelson, Christopher

Uh, we're still discussing that, but just kind of give you a little flavor of what those were. Some of the fields we were considering was, you know.

0:9:18.220 --> 0:9:22.430

Mickelson, Christopher

Language spoken. Gender account.

0:9:22.510 --> 0:9:45.610

Mickelson, Christopher

Of housing type things of that. And so I think we've maybe got a few of them kind of finalize or at least ironed out, but there's still more discussion along those items outside of that that kind of gives you kind of a high overview of the general topics that have been discussed and.

0:9:46.350 --> 0:9:52.70

Mickelson, Christopher

As we come to a general agreement and conclusion, we will bring that to the larger group.

0:9:57.690 --> 0:9:58.740

Mickelson, Christopher

Any questions?

0:10:4.800 --> 0:10:9.750

Mickelson, Christopher

Alright, well, I think we're on to the third item on the agenda then.

0:10:12.130 --> 0:10:28.950

Pfordte, Byron

Nice, Chris. This first one, I think it was on here, if I'm recalling correctly, this was presented in our last meeting that we did apply the 25% WEAf grant additional 25% and retroactively to the accounts. And then B there.

0:10:29.20 --> 0:10:47.500

Pfordte, Byron

Ohh the Permittees request which thank you Misty for bringing that to our attention. We retroactively went back and applied additional funds to those who did not get the \$125 minimum applied to their account. So those have been taken care of.

0:10:47.600 --> 0:10:50.410

Pfordte, Byron

Umm, any any questions on those?

0:10:53.890 --> 0:10:55.620

Pfordte, Byron

I believe Shannon, have you?

0:10:56.950 --> 0:11:1.720

Pfordte, Byron

Ohm notified the agencies of the accounts that were adjusted.

0:11:3.340 --> 0:11:5.470

Steed, Shannon

Yes, I have for both A&B.

0:11:5.810 --> 0:11:6.740

Pfordte, Byron

Yeah. OK.

0:11:7.460 --> 0:11:12.40

Pfordte, Byron

So any questions on that or any issues with the files that were sent?

0:11:18.480 --> 0:11:20.280

Pfordte, Byron

OK, then I will move on to #4.

0:11:23.20 --> 0:11:32.870

Pfordte, Byron

I don't have an estimate for the completion time for the propensity model from 4 economics. We're Washington. I know that they're focusing on Oregon right now.

0:11:34.270 --> 0:11:34.940

Pfordte, Byron

And.

0:11:36.170 --> 0:11:42.630

Pfordte, Byron

Dan has been in more, um, communication with them than I have and I I probably.

0:11:43.610 --> 0:11:54.910

Pfordte, Byron

Should have reached out to him at this and and bent his ear a little bit on it, but I don't have an estimated completion date unfortunately. I apologize for that, but he will be here, I think.

0:11:56.290 --> 0:11:58.100

Pfordte, Byron

For our next.

0:11:59.250 --> 0:11:59.890

Pfordte, Byron

Umm.

0:12:1.410 --> 0:12:8.980

Pfordte, Byron

Advisory group meeting. Uh, I'll double check on that, but he will at some point Mark Thompson will from forefront economics will present.

0:12:9.420 --> 0:12:10.970

Pfordte, Byron

Ohm the.

0:12:12.400 --> 0:12:19.450

Pfordte, Byron

Propensity model and the needs assessment for for Washington that they're that they're conducting for us.

0:12:20.870 --> 0:12:21.480

Pfordte, Byron
And.

0:12:22.480 --> 0:12:32.400

Pfordte, Byron
Any any questions on that? Obviously you know it's the goal of that is to help us identify these these customers that would.

0:12:33.670 --> 0:12:48.430

Pfordte, Byron
Have a tendency or need to uh, enroll in in these programs, but for, for whatever reason have not and allowing us to identify and target them with specific communication pieces and and outreach pieces.

0:12:49.800 --> 0:12:50.570

Pfordte, Byron
Uh, yoki?

0:12:53.310 --> 0:13:1.390

Yochi Zakai
Thanks, Byron. Yeah, when you send out the notes from this meeting, could you perhaps include an estimated completion time for that?

0:13:3.40 --> 0:13:3.350

Pfordte, Byron
Yes.

0:13:4.580 --> 0:13:4.960

Yochi Zakai
Thanks.

0:13:14.250 --> 0:13:16.370

Pfordte, Byron
Alright. Any other questions?

0:13:22.30 --> 0:13:33.300

Pfordte, Byron
And we'll move on to #5, which I anticipate taking the majority of the rest of this meeting and that has to do with our CBO program development.

0:13:34.600 --> 0:13:41.890

Pfordte, Byron
There were again couple emails that went around outside of this meeting proposing.

0:13:43.920 --> 0:13:49.390

Pfordte, Byron
Some some points for how the program should be developed and I I believe.

0:13:52.450 --> 0:13:53.320

Pfordte, Byron
There was.

0:13:55.400 --> 0:14:3.890

Pfordte, Byron
It was proposed that, you know the \$73,000 annual budget be provided to the CAA's and they.

0:14:3.970 --> 0:14:4.500

Pfordte, Byron
Now.

0:14:5.800 --> 0:14:8.450

Pfordte, Byron
Kind of, I guess.

0:14:10.90 --> 0:14:22.480

Pfordte, Byron
Control the outreach for UH-4 and two CBO and the compensation would be for those outreach efforts not tied to referral fees.

0:14:23.80 --> 0:14:31.930

Pfordte, Byron
Um and I, in speaking with internally. I don't think there's been any objections to.

0:14:33.90 --> 0:14:37.620

Pfordte, Byron
That method there would just need to be from our side, you know some.

0:14:38.20 --> 0:14:53.850

Pfordte, Byron
Um, pretty diligent reporting on activities, you know, to support the CBO. We'd like, you know, quarterly reporting on pledges received and compensation awarded. And and if it comes to it, a plan for unused funds but.

0:14:55.650 --> 0:14:58.570

Pfordte, Byron
I'm all ears and open to any suggestions on.

0:14:59.310 --> 0:15:1.270

Pfordte, Byron
On the direction for how.

0:15:2.620 --> 0:15:4.620

Pfordte, Byron
This CBO program should be.

0:15:5.380 --> 0:15:8.490

Pfordte, Byron

Uh, I guess developed and and administered so.

0:15:10.100 --> 0:15:12.760

Pfordte, Byron

I'll I'll just open it U for anybody's comments.

0:15:20.320 --> 0:15:53.10

Yochi Zakai

Thanks Byron. I can chime in. I put the e-mail that I sent around earlier into the chat so folks would have it kind of handy. But basically you know what tap is thinking about I think is is as you describe that you know the CA would get grants where well those Caas that are interested would get grants and then they could use that to you know perform outreach to community based organizations and then contract.

0:15:53.710 --> 0:16:4.740

Yochi Zakai

To those community based organizations to perform outreach programs and outreach to customers to let them know about energy assistance.

0:16:5.160 --> 0:16:20.930

Yochi Zakai

Umm, I'm really excited about this program and I'm really excited that we're talking about it. So yeah, thanks. I guess, you know, the only other thing I'll mention is that I reached out to many.

0:16:21.370 --> 0:16:32.840

Yochi Zakai

Um of the CAA's in advance to see who would be interested in participating in the program, and so far I've heard back from.

0:16:34.380 --> 0:17:1.900

Yochi Zakai

Misty at Skagit and Lorena at Opportunity Council that they are definitely interested in in learning more and seeing if they could participate. I don't think we should limit it to those two, but that just goes to say that I don't think that, especially as we're in the first three-year pilot phase, we would expect every CAA to participate, but perhaps just more of a limited number of those that self select as interested.

0:17:6.390 --> 0:17:13.160

Yochi Zakai

And I'll leave it there for now. Lori and I saw you had your hand up, but I started talking anyway. My apologies. Do you wanna add anything else?

0:17:14.180 --> 0:17:17.970

Lorena Shah

No, thank you, yochi. I'm glad you you teed up that conversation. That's great.

0:17:19.210 --> 0:17:39.660

Lorena Shah

Yeah, in in, like Yochi said, we as an agency are are very interested in this. We've been doing a little bit of this work with our rental assistance programming. That was new a different way of working with the Cbos and we historically had. And so I think the main points for.

0:17:40.280 --> 0:18:10.430

Lorena Shah

For for me, from our agencies point of view, for it to be viable is that there is a, you know, one that there are dollars two contract to those those cbos in order to support their capacity to to do outreach and to potentially bring people to the programs and that there is sufficient capacity within whatever contracts to for A at least a certain level of.

0:18:10.500 --> 0:18:17.120

Lorena Shah

FTE to be devoted to managing those contracts, which isn't which really is mostly about.

0:18:17.880 --> 0:18:36.460

Lorena Shah

You know, convening those CBO together, learning from each other, you know, going out to their location. So they're so this is it's not as simple as just like us sending out subcontracts and subcontracting out all the money. We do need to retain funds in order to do a good job of subcontracting that subcontracting that out because.

0:18:37.510 --> 0:19:3.80

Lorena Shah

You know, the expertise obviously lies with us on on energy. And so it's just it's just really important that the agencies that do opt in have have FTE devoted to to really doing a good job on this type of outreach and that there is also money to share with the CBO. So we are paying for their, you know knowledge and and expertise in their their communities that they serve.

0:19:8.610 --> 0:19:26.610

Lorena Shah

And I would maybe add just one note about you know, thinking about obviously a understand, CNG is thinking about like how many people are you signing up for, you know the programs I would say yes that's that is something we would also agree with. But there there is.

0:19:27.230 --> 0:19:31.370

Lorena Shah

Especially folks are kind of new to this work, that there is definitely.

0:19:33.220 --> 0:20:4.190

Lorena Shah

There is time that's needed to build these relationships for them to be really productive. Relationships. You know, we're we're still don't have the right recipe even in in Whatcom County all the time, you know, a lot of times are are programs don't quite fit the needs of the community. So you're kind of you know, you're trying to advocate for the programs and for the benefits of the programs to a group of people who are kind of skeptical of your programs. And so it just it just some of these communities have been raked over the coals for so long.

0:20:4.250 --> 0:20:30.310

Lorena Shah

Like things are not created with them centered and so just the relationships can take time and so I would encourage us to think about some interim metrics in order to measure that activity. That may not always just be like, OK, here's the program, get your people signed up, it's not as simple as that. So I just wanted to add that in as well.

0:20:35.950 --> 0:20:38.40

Pfordte, Byron

I thank you for those details and.

0:20:39.200 --> 0:20:49.870

Pfordte, Byron

Obviously having some experience, probably more experience than most of us on this call will likely bend your ear quite a bit on on setting some goals and and how to.

0:20:51.210 --> 0:20:59.340

Pfordte, Byron

Best administer this project, but I I think you know the goal is to to grow it so that there are more agencies involved. And so I think it would be good whether.

0:21:0.740 --> 0:21:4.610

Pfordte, Byron

You plan to opt into this program initially or not.

0:21:5.980 --> 0:21:10.630

Pfordte, Byron

To still, you know, kind of voice your concerns or or offer.

0:21:12.0 --> 0:21:24.590

Pfordte, Byron

Your ideas in developing these programs so that it is something that may you know every agency need and and capability I think is a little bit different. And so if we can make it as.

0:21:25.970 --> 0:21:39.400

Pfordte, Byron

As easy and as as uniform as we can across all the agencies, I think that would be beneficial. So please don't hesitate to speak up on this topic as hopefully it will be something that you utilize.

0:21:42.580 --> 0:21:48.390

Pfordte, Byron

Now I will say Chris just sent me a message and he had the answer yochi too.

0:21:49.870 --> 0:21:57.280

Pfordte, Byron

When forefront is is estimating to be done in Washington with their study and it's at this time it's mid June.

0:22:6.340 --> 0:22:8.140

Pfordte, Byron
Any any comments?

0:22:8.310 --> 0:22:27.500

Pfordte, Byron
Umm and if not, I'll learn. I'll ask you a question and and it's mainly to just kind of get a baseline of what to expect as as you can see there item 2 under the CBO program development is setting enrollment goals and.

0:22:29.0 --> 0:22:30.710

Pfordte, Byron
To be honest, I.

0:22:31.540 --> 0:22:42.820

Pfordte, Byron
I don't know what to expect. We have had uh CBO program in Oregon that had limited use last year and.

0:22:44.140 --> 0:22:48.720

Pfordte, Byron
You know, obviously we would like this to be more successful than than our previous attempt, but.

0:22:50.20 --> 0:22:57.300

Pfordte, Byron
If you can provide any insight as to realistic goals, enrollment goals, that would be appreciated.

0:22:57.830 --> 0:23:13.980

Lorena Shah
Yeah, that's a really good question. And when I definitely would want to give some more thought to. But I would say this that I think it will definitely depend on the, you know, the size of the organization that you know that one would be working with, what they're reach is into the community.

0:23:15.420 --> 0:23:20.470

Lorena Shah
And I would and and and you know, kind of setting it from there. So it may be in May.

0:23:21.610 --> 0:23:36.940

Lorena Shah
Could be that there's in different types of goals or different metrics for different types of organizations, or different sizes of organizations. I'm not sure a straight sort of percentage would is going to work. I have to give that more thought. I would say this though that.

0:23:38.90 --> 0:24:9.260

Lorena Shah
When we're talking about, you know, some of our most vulnerable people, like it's a win to get a small handful of those who have been so disconnected from these types of services connected to these types of services, even though it's a relatively small amount like those are really big wins for us. One example is

we work with the hearing speech and deafness center here in in Bellingham, and there's, to be frank, not a ton of folks that are deaf in our community. They're they serve a rather small group, but.

0:24:9.400 --> 0:24:40.730

Lorena Shah

These folks are so disconnected from mainstream society that the benefit of bringing in such a valuable resource, whether it's, you know, rental assistance, or you know, a build discount rate like kind of Trump's the like straight numbers. So. So I just want to be be mindful of like even small amounts of increases to me as a win because we are connecting some of the most disconnected folks in our communities.

0:24:42.230 --> 0:25:3.560

Lorena Shah

But I know that doesn't really answer your question. It calls and I'd have to. I think I'd have to kind of think through that because you know kind of depends on how many gas accounts do we have in the, you know those that you're serving and that kind of thing to do, you know, to kind of come up with some sort of formula for determining what's a reasonable goal for those.

0:25:4.910 --> 0:25:6.880

Lorena Shah

For those different types of CBO.

0:25:8.950 --> 0:25:40.0

Lorena Shah

I think about like another example we work with is a group that works primarily with farm workers, which I know OIC is on here and you guys are gonna have probably loads more experience with this than us, but this group that provides promotoras to those communities, like many of them, are in housing that this type of service isn't going to really work. But there may be a portion of those that are in housing that do have gas bills. And so it's kind of trying to make some guesstimates.

0:25:40.80 --> 0:25:50.870

Lorena Shah

Mike, OK, out of your, you're like 2000 people you serve or 200 people you serve kind of who is seemingly going to be a fit for this. And of those, how many do we think we could enroll?

0:25:59.90 --> 0:26:4.280

Pfordte, Byron

So maybe for enrollment goals we we table that for a little while as we.

0:26:6.250 --> 0:26:18.120

Pfordte, Byron

And and it may paint a clearer picture of of what our goal should be as we address, you know, the types of outreach and and then also, you know.

0:26:18.760 --> 0:26:27.480

Pfordte, Byron

How many of of how many agencies are going to participate in this program? And and so with, you know, with \$73,000 budget and.

0:26:28.120 --> 0:26:28.770

Pfordte, Byron
Ohm.

0:26:31.740 --> 0:26:33.170

Pfordte, Byron
Is is there any?

0:26:35.620 --> 0:26:40.610

Pfordte, Byron
Ideas for for outreach to the CEO's and then any?

0:26:43.680 --> 0:26:46.870

Pfordte, Byron
Any light that can be shed on on how the CBO?

0:26:48.120 --> 0:26:50.170

Pfordte, Byron
Can be assisted in their outreach with those funds.

0:27:1.240 --> 0:27:2.900

Pfordte, Byron
And also I was just a.

0:27:3.630 --> 0:27:6.300

Pfordte, Byron
I guess fuel the conversation a little more I'll also.

0:27:7.500 --> 0:27:24.840

Pfordte, Byron
Ask if there's any any issues with you know providing detailed reports on a regular basis at least quarterly on these activities and and what compensation has been or what amount of the funds have been used for outreach and how they've been used.

0:27:27.270 --> 0:27:34.380

Lorena Shah
I I'll just speak up again, but please, if somebody wants to shut me up and speak, do raise your hand or cut me off.

0:27:35.720 --> 0:27:49.220

Lorena Shah
I do think that your quarterly reports of some sort are totally reasonable. We require that in the types of outreach that I'm doing with cbos right now. So I think that's not, that's something that at least my cbos that we're working with are already used to.

0:27:50.440 --> 0:28:16.190

Lorena Shah
And you know, we have some templates for that that, you know we modify for each type of different outreach, you know, currently with our current funding that we're using to support those in with the

programs that we're supporting them with, it's we're doing a flat amount each month to those organizations for outreach and have included in their scope of work the type of outreach we're expecting. So it's not, we're not doing cost reimbursement.

0:28:16.900 --> 0:28:17.360

Lorena Shah
Which?

0:28:17.440 --> 0:28:27.970

Lorena Shah
Umm, you know, to be honest, is harder to manage but is probably I shouldn't say that we're not doing.

0:28:29.830 --> 0:29:0.830

Lorena Shah
We are doing cost reimbursement in the sense that the work happens, then we pay, but we're not. It's they're not, they're not billing. You know they're not sending in expanded general ledgers to us. And we only pay the amount they that they actually, you know, spent on the program. We are paying them flat monthly rates. You know as low as 1000 for one of my programs. And then you know upwards from there with rental assistance, which is a far bigger program and was fairly robustly funded for this work. So those are those contracts are bigger but.

0:29:1.540 --> 0:29:18.860

Lorena Shah
So like ideally it would be that kind of like here's the scope of work and these are the types of activities. These are the things that we're gonna. You're gonna report on, and we're gonna give you a flat amount each month to accomplish that work is kind of the cleanest. I don't know if that obviously something for CNG to consider, but.

0:29:20.280 --> 0:29:24.10

Lorena Shah
From my perspective, that has worked out the best and it's the cleanest.

0:29:26.460 --> 0:29:33.420

Pfordte, Byron
And the the information you get back from the CBO. So you're not, you're you're distributing that flat fee.

0:29:40.330 --> 0:29:40.740

Lorena Shah
Correct.

0:29:35.50 --> 0:29:41.770

Pfordte, Byron
And and not requiring any sort of detailed report as to how it's spent is, am I OK?

0:29:41.830 --> 0:29:42.610

Lorena Shah
Yep.

0:29:43.260 --> 0:29:48.350

Pfordte, Byron

So how are is there any measurement for your return on that that flat fee?

0:29:48.650 --> 0:29:54.480

Lorena Shah

The quarterly reports then tell us, give us both narrative and numeric information on what was accomplished.

0:30:2.620 --> 0:30:6.70

Pfordte, Byron

Your hand up. Let's see. Christy, go ahead.

0:30:7.690 --> 0:30:37.200

Kristi Hills (Guest)

Yeah. I just wanted to chime in for Chelan Douglas Community Action Council. We also engage in contracts with what we consider our buying for partners, so they reach segments of the population, maybe a little better than we do at times. So we trust them with the communications and pay them also for their work in a similar way that was just being talked about. We don't track the level of detail like how many applications were completed or what have you.

0:30:37.560 --> 0:30:40.350

Kristi Hills (Guest)

That we feel like that level of detail is.

0:30:41.890 --> 0:31:10.480

Kristi Hills (Guest)

Not as beneficial as getting the word out, so our partners spend the time getting the word out. So I think the kind of tracking that you maybe would be hoping for like the actual results are just going to be a little bit harder to track in this model. But we know through some of our programs like the eviction Rental Assistance program for example, we have no doubt that the outreach our partners are doing is effective just sheerly by the numbers of people who come through the door for that service.

0:31:18.330 --> 0:31:18.750

Pfordte, Byron

Thank you.

0:31:19.950 --> 0:31:21.180

Pfordte, Byron

Any idea how?

0:31:22.530 --> 0:31:28.870

Pfordte, Byron

You know our eventual energy discount program and and arrearage management program would fit into.

0:31:30.310 --> 0:31:32.860

Pfordte, Byron

I guess the presentation at the CBO provide.

0:31:34.120 --> 0:31:36.410

Pfordte, Byron

To potential customers is.

0:31:38.390 --> 0:31:42.400

Pfordte, Byron

Yeah, I'm. I'm. I'm asking out of pure ignorance as I've never. Never really.

0:31:44.670 --> 0:31:53.20

Pfordte, Byron

Experienced, I guess that side of it I I don't know how um, I guess outreach efforts are prioritized and programs are prioritized.

0:31:55.210 --> 0:31:59.20

Pfordte, Byron

Anybody have any idea that can kind of educate me on that a little bit?

0:32:0.300 --> 0:32:24.870

Kristi Hills (Guest)

Yeah, you know, some of that, this is Christy again, some of that is you know some of our clientele really works best by verbal communication as opposed to written communication. So knowing who our partners are, for example, a small nonprofit close to us has regular in person, verbal communication with the Hispanic population around here.

0:32:25.540 --> 0:32:59.930

Kristi Hills (Guest)

So we can share with our partners a particular message for quite some time. It's about rent and now it's switching to the working family tax credit. So we just asked them to change their messaging for us. And sometimes it's about informing of the program, sometimes it's about informing of the ramping down and closing out of a program. Sometimes it's about the time frame, but the partner is here from us, what our needs are for the messaging and then they change the messaging as we need them to when they have these conversations with others.

0:33:0.420 --> 0:33:22.970

Kristi Hills (Guest)

Uh, they will hand out the Flyers and things like that that we produce as well, and that's always nice. They include us in social media of their own. They make efforts in other types of media as well. So it's just that extended reach that they have and those are partners that we have really solid relationships with already. They just talk to some of.

0:33:23.750 --> 0:33:27.160

Kristi Hills (Guest)

Our customers more regularly if that makes any sense.

0:33:28.120 --> 0:33:28.890

Pfordte, Byron

Yeah, absolutely.

0:33:32.140 --> 0:33:32.570

Pfordte, Byron
Umm.

0:33:34.920 --> 0:33:35.820

Pfordte, Byron
No, no, go ahead.

0:33:32.160 --> 0:33:36.950

Mickelson, Christopher
So this is sorry if I were this Chris Mickelson with Cascade.

0:33:38.760 --> 0:34:10.410

Mickelson, Christopher
Within the Cascades last journal rate case, the Commission, within its order established a pilot program for the CBO funds, and they gave us three years, but they expect to see results and so kind of getting back to the previous question Byron asked about maybe more detail. I think we made need that so we can show results. Otherwise we're not gonna have a lot to be able to show the Commission.

0:34:10.510 --> 0:34:15.870

Mickelson, Christopher
If we can't really show like they help this many people and this is where money went.

0:34:17.830 --> 0:34:21.380

Mickelson, Christopher
So something to consider as we design this.

0:34:22.30 --> 0:34:26.200

Kristi Hills (Guest)
Is this coming down from CETA also like our utility, other utilities do?

0:34:33.320 --> 0:34:33.590

Kristi Hills (Guest)
Well.

0:34:27.500 --> 0:34:39.110

Mickelson, Christopher
Uh, well, this was specifically for cascade within our general rate case order. So I I don't know if there was something else in Sita that may also impact this, but.

0:34:39.610 --> 0:34:53.10

Kristi Hills (Guest)
Ohh hmm. Well, I was just wondering if like some sort of a discounted rate on going could be helpful anyway, never mind, it may just be a little different.

0:35:1.930 --> 0:35:3.840

Pfordte, Byron
Those of you that good.

0:35:1.750 --> 0:35:27.880

Lorena Shah

And do think you know between the company and between those of us that may be interested in in taking up this pilot. I I do feel like we can show reach. You know I I feel like trying to remember all the metrics we are collecting through our quarterly report though I would agree with Christy like 100% of what she said is how we are also working with our our our cbos as well.

0:35:29.180 --> 0:35:32.470

Lorena Shah

But and you know, I'm just trying to think.

0:35:33.670 --> 0:35:39.120

Lorena Shah

You know, some of that also like depending on how people are signing up, you know, CNG may wanna.

0:35:39.800 --> 0:35:47.730

Lorena Shah

Consider a field about where did you hear us from? You know, hear from us from or that kind of thing to try to gauge where. How are people learning about this?

0:35:50.240 --> 0:36:7.70

Lorena Shah

But I feel like we could come up with some interim or some some level of metrics that would hopefully make the, you know, Commission feel comfortable that that, these that we these funds are accomplishing something.

0:36:8.570 --> 0:36:12.340

Lorena Shah

It just, we just probably don't wanna lean on straight enrollments.

0:36:13.430 --> 0:36:18.310

Lorena Shah

Because there's a lot of preparatory work and other work that that happens, that is.

0:36:18.790 --> 0:36:22.720

Lorena Shah

Uh, useful and beneficial to count as well.

0:36:26.50 --> 0:36:39.850

Mickelson, Christopher

I understand completely. Like I said, I I just wanted to bring this up because this is a three-year pilot, at which point I assume Cascade will have to go back to the Commission show.

0:36:40.720 --> 0:36:46.90

Mickelson, Christopher

You know the results, whatever that may be, as we've designed it.

0:36:46.810 --> 0:37:5.360

Mickelson, Christopher

And so we can, you know, get commissioned blessing to continue the program. Otherwise, if we don't really have anything we can truly show result wise, I could see three years from now they say well that was nice of you. You're no longer fund this.

0:37:6.490 --> 0:37:13.470

Mickelson, Christopher

So I'm just throwing it out there, just something to consider as we do design the CBO program.

0:37:18.530 --> 0:37:23.500

Kristi Hills (Guest)

Will there be a time that this group will be able to see what those benchmarks are?

0:37:28.820 --> 0:37:29.210

Mickelson, Christopher

Uh.

0:37:28.970 --> 0:37:29.560

Pfordte, Byron

I think.

0:37:39.220 --> 0:37:39.900

Mickelson, Christopher

Stop.

0:37:30.330 --> 0:37:42.310

Kristi Hills (Guest)

Well, the the outcomes that you're trying to achieve that the Commission is trying to see realized what will be be able to see what that looks like to maybe start getting a little more creative about how we could demonstrate.

0:37:43.200 --> 0:37:44.80

Kristi Hills (Guest)

But she made them.

0:37:44.510 --> 0:38:2.580

Mickelson, Christopher

Yeah. So the Commission didn't really give us any benchmarks. Ohh though there is some. The Commission is in a process of performance based regulation and there could be maybe some benchmarks we wanna try to tie to there cuz there's some equity and.

0:38:5.240 --> 0:38:31.690

Mickelson, Christopher

Marginalized communities that were supposed to try to reach there. So maybe we'll try to maybe use some of those benchmarks, but overall, the Commission just kind of said cascade work with the advisory group to come up with a process and design for this program that provides results in essence. So I think most of the benchmarking is kind of what we feel we can get.

0:38:32.840 --> 0:38:42.600

Mickelson, Christopher

That's not overly administratively burden, both to agency, CBO or the company and kind of go from there.

0:38:47.300 --> 0:38:48.190

Kristi Hills (Guest)

Great. Thank you.

0:38:48.490 --> 0:38:56.970

Kristi Hills (Guest)

I I would agree with what was said earlier. I think that we can be creative enough to come up with some outcomes as long as we're.

0:38:58.200 --> 0:39:2.670

Kristi Hills (Guest)

Really understanding what they are. You know, we're pretty small here and as far as our reach with.

0:39:4.80 --> 0:39:18.140

Kristi Hills (Guest)

With your services, you know or high electricity here and less of the cascade natural gas, but there is probably a percent or two here and we just have a hard time getting to them, but would love to be a part of being creative to help you with this.

0:39:20.260 --> 0:39:20.690

Mickelson, Christopher

Thank you.

0:39:23.660 --> 0:39:29.450

Pfordte, Byron

Well, I mean from what Chris has shared about the the performance based.

0:39:35.130 --> 0:39:40.250

Pfordte, Byron

So we're our regulations that the Commission is is looking for, they definitely have.

0:39:41.590 --> 0:39:42.270

Pfordte, Byron

Some.

0:39:43.20 --> 0:39:44.570

Pfordte, Byron

Specific uh.

0:39:45.890 --> 0:39:57.980

Pfordte, Byron

Details are looking for tied to low income customers and a big part of that is enrollment in specifically arrearage management plans and.

0:39:59.150 --> 0:40:16.940

Pfordte, Byron

And in reduction of arrearages. So obviously you know the programs that we develop here have a huge impact on both those metrics. And so in in my my thinking, I mean those those are the sort of metrics that they're going to be looking for.

0:40:17.50 --> 0:40:22.120

Pfordte, Byron

Umm to justify the effectiveness of of these programs?

0:40:30.150 --> 0:40:37.320

Pfordte, Byron

I know that Yochi said he sent an e-mail out and only heard from I think, he said. Misty and Lorena as far as interest in.

0:40:38.10 --> 0:40:42.150

Pfordte, Byron

Ohh participating and it at least initially in this CBO program.

0:40:43.660 --> 0:40:47.30

Pfordte, Byron

While we have, I believe most.

0:40:48.650 --> 0:40:56.20

Pfordte, Byron

Agencies represented on on this call. Are there any others that would be interested in participating in this program?

0:41:4.490 --> 0:41:6.190

Pfordte, Byron

And I think right now we can agree that.

0:41:7.40 --> 0:41:8.370

Pfordte, Byron

The.

0:41:9.580 --> 0:41:17.710

Pfordte, Byron

The \$73,000 would be just, you know, a budget that would be allocated to to the agencies to use at their discretion.

0:41:19.80 --> 0:41:20.740

Pfordte, Byron

Keeping in mind you know that we would.

0:41:21.420 --> 0:41:23.330

Pfordte, Byron

Require quarterly reporting but.

0:41:26.430 --> 0:41:32.740

Pfordte, Byron

With with those details at least nailed down any any interest from any of the other agencies.

0:41:35.280 --> 0:41:44.180

Kristi Hills (Guest)

I'd say Chelan Douglas has some interest. Uh, the initial presentation got us a little nervous because the administrative burden seemed pretty high, but I think.

0:41:45.400 --> 0:41:51.480

Kristi Hills (Guest)

The open conversation here helps for us to be a little more open to it, so I'd say we have some interest.

0:41:52.980 --> 0:41:53.260

Pfordte, Byron

Right.

0:41:54.490 --> 0:41:55.140

Lorena Shah

Byron.

0:41:54.350 --> 0:42:0.540

Sylvia Schaeffer

This is Sylvia with Blue Mountain Action Council and I I agree with Christy. I think we would be interested as well.

0:42:14.100 --> 0:42:14.660

Pfordte, Byron

It's.

0:42:4.800 --> 0:42:15.110

Lorena Shah

Byron, what is the time frame on this initial 73,000? Is this for the whole three years we would be expected to contract or is this like a year one budget or?

0:42:15.410 --> 0:42:16.330

Pfordte, Byron

It's annual.

0:42:16.900 --> 0:42:17.350

Lorena Shah

OK.

0:42:18.500 --> 0:42:22.910

Lorena Shah

Starting in September or in October, or at any point, we get this up and going.

0:42:34.50 --> 0:42:34.370

Lorena Shah
Yeah.

0:42:25.20 --> 0:42:34.650

Pfordte, Byron
I believe it's at any point, but it would make sense to me that it would tie to our, you know, regular heating season and.

0:42:36.20 --> 0:42:41.550

Mickelson, Christopher
Yeah, it's actually tied to our annual WEA program budget year, so.

0:42:42.940 --> 0:42:44.590

Pfordte, Byron
And as that start October 1st, Chris?

0:42:45.430 --> 0:42:46.980

Mickelson, Christopher
Yes, I believe so.

0:42:49.620 --> 0:42:51.510

Mickelson, Christopher
October through September.

0:43:1.620 --> 0:43:3.650

Pfordte, Byron
Anybody else with interest?

0:43:4.630 --> 0:43:4.930

Pfordte, Byron
Just.

0:43:8.450 --> 0:43:12.520

Pfordte, Byron
I think you know four or five agencies, uh, at least initially.

0:43:15.500 --> 0:43:18.600

Pfordte, Byron
Would be a good test group to.

0:43:19.940 --> 0:43:21.820

Pfordte, Byron
To get this off the ground.

0:43:23.210 --> 0:43:26.730

Pfordte, Byron
Would perhaps give a little more leeway in budget and and.

0:43:27.800 --> 0:43:31.550

Pfordte, Byron

I I come from a marketing background and I know that it takes a.

0:43:32.480 --> 0:43:43.910

Pfordte, Byron

A lot of trial and error and testing to find the right formula to reach customers and so you know it to have a little bit of room to fail is not a bad thing. So if there's.

0:43:44.680 --> 0:43:50.810

Pfordte, Byron

You know, as I said, if we have four or five agencies participating, I think that gives that that room to fail.

0:43:52.350 --> 0:43:55.500

Pfordte, Byron

And and hopefully hone in on our target, but the.

0:43:58.430 --> 0:43:59.140

Pfordte, Byron

Any.

0:44:0.410 --> 0:44:3.620

Pfordte, Byron

Any other questions regarding the budget or?

0:44:5.190 --> 0:44:8.350

Pfordte, Byron

One last call for any other agency that wants to participate.

0:44:12.80 --> 0:44:14.720

Kristi Hills (Guest)

One question, just wondering if.

0:44:15.850 --> 0:44:19.350

Kristi Hills (Guest)

Through this process, it if the agencies who.

0:44:20.160 --> 0:44:31.570

Kristi Hills (Guest)

For interested do agree will we get some help from Cascade natural gas identifying perhaps who to send mailers to or will that be not an option?

0:44:34.430 --> 0:44:42.260

Pfordte, Byron

Yeah. No, we will support how we can and I think through the PROPENSITY study will hopefully be able to identify.

0:44:44.250 --> 0:44:51.350

Pfordte, Byron

And and provide you know some some targeting for outreach efforts and CBO and those areas.

0:44:52.510 --> 0:44:53.340

Pfordte, Byron

To connect with.

0:44:54.330 --> 0:44:54.910

Pfordte, Byron

So yes.

0:44:55.350 --> 0:44:57.280

Kristi Hills (Guest)

Great. That would be really helpful. Thank you.

0:45:8.30 --> 0:45:9.660

Pfordte, Byron

OK, moving on.

0:45:17.10 --> 0:45:18.40

Pfordte, Byron

Knowing.

0:45:20.560 --> 0:45:28.240

Pfordte, Byron

Somewhat the metrics we need to receive and I know Chris talked about this and Lorena mentioned it.

0:45:30.70 --> 0:45:31.630

Pfordte, Byron

Lorena mentioned, I guess kind of the.

0:45:31.860 --> 0:45:32.120

Pfordte, Byron

So.

0:45:33.620 --> 0:45:39.690

Pfordte, Byron

Hurdle to receiving, you know, detailed metrics about enrollment and and applications.

0:45:42.780 --> 0:45:47.400

Pfordte, Byron

If it comes down to the Commission, you know, wanting to know.

0:45:48.110 --> 0:45:48.750

Pfordte, Byron

Ohh.

0:45:51.620 --> 0:45:59.650

Pfordte, Byron

Quantities of applications and and specifics about outreach from conducted by the CBO's is any.

0:46:0.850 --> 0:46:4.90

Pfordte, Byron

Any concerns that that will be an issue getting that information?

0:46:21.870 --> 0:46:22.600

Pfordte, Byron

OK, great.

0:46:32.700 --> 0:46:33.130

Pfordte, Byron

Alright.

0:46:38.430 --> 0:46:39.540

Pfordte, Byron

Just for the record.

0:46:41.440 --> 0:46:45.210

Pfordte, Byron

Can I get agreement? I guess verbally or.

0:46:46.730 --> 0:46:50.290

Pfordte, Byron

In the chat, if there is any issues with.

0:46:51.690 --> 0:46:55.160

Pfordte, Byron

Moving forward with the \$73,000 annual budget.

0:46:56.410 --> 0:46:58.140

Pfordte, Byron

For compensation for outreach.

0:46:59.190 --> 0:47:1.310

Pfordte, Byron

For the CBO, just so we have it on the record.

0:47:6.10 --> 0:47:11.610

Pfordte, Byron

We are simply better to to ask is there agreement on that? So yeah, there would be good.

0:47:22.300 --> 0:47:23.90

Pfordte, Byron

Great. Thank you.

0:47:32.340 --> 0:47:34.90

Pfordte, Byron

Yeah, with the above caveat.

0:47:36.200 --> 0:47:41.70

Lorena Shah

Just agreeing, as long as we can collaboratively develop those metrics, that was my.

0:47:41.770 --> 0:47:42.520

Lorena Shah

My only.

0:47:44.630 --> 0:47:45.750

Lorena Shah

My only caveat.

0:47:47.140 --> 0:47:49.560

Pfordte, Byron

And if if those metrics do include though.

0:47:51.0 --> 0:47:56.240

Pfordte, Byron

Quantity of applications generated by the CBO. You don't see that as an issue though, correct?

0:47:57.650 --> 0:47:58.100

Pfordte, Byron

OK.

0:47:56.510 --> 0:48:2.690

Lorena Shah

No, I yeah, just more setting reasonable goals around it. But I think collecting it should be fine.

0:48:3.990 --> 0:48:10.590

Lorena Shah

In most cases, we may miss some if they're, you know, signing up in a different way. But that's something to think through too, so.

0:48:15.0 --> 0:48:19.430

Kristi Hills (Guest)

I guess I would add to that too. This is Christy Schland Douglas. I would add that.

0:48:20.470 --> 0:48:30.380

Kristi Hills (Guest)

If it's the same dollar amount across the board with the same expectation for the metrics across the board, we would be challenged with that in our area.

0:48:31.570 --> 0:48:34.200

Pfordte, Byron

Yeah, I think, I mean, we would need to.

0:48:35.210 --> 0:48:35.980

Pfordte, Byron
Consider.

0:48:37.760 --> 0:48:39.790

Pfordte, Byron
The demographics.

0:48:40.860 --> 0:48:52.20

Pfordte, Byron
And angiography of of each of your areas and and adjust goals accordingly. I don't think there can be A1 size fits all for for each of these.

0:48:53.780 --> 0:49:1.830

Pfordte, Byron
CBO programs are outreach efforts from each agency. If anybody feels differently or or disagrees, let me know.

0:49:4.590 --> 0:49:9.890

Kristi Hills (Guest)
Of great, I think unique goals would be really important. I appreciate that you've acknowledged that. Thank you.

0:49:28.970 --> 0:49:29.540

Pfordte, Byron
Alright.

0:49:36.440 --> 0:49:38.810

Pfordte, Byron
I don't think we had anything else on the agenda.

0:49:42.220 --> 0:49:46.50

Pfordte, Byron
I'll open it up just to see if there's any general comments or questions.

0:49:46.150 --> 0:49:52.590

Pfordte, Byron
No, not necessarily. About the CBO program, but just anything in general that may have not been covered.

0:49:56.210 --> 0:49:57.460

Pfordte, Byron
Any any questions?

0:50:1.870 --> 0:50:2.540

Pfordte, Byron
Comments.

0:50:3.940 --> 0:50:7.310

Pfordte, Byron

Anything from the Cascade team they want to add that perhaps I missed.

0:50:12.110 --> 0:50:14.880

Mickelson, Christopher

Nothing here on my end but.

0:50:16.460 --> 0:50:21.990

Mickelson, Christopher

Our necks, I guess. Uh large advisory group is March 15th.

0:50:22.660 --> 0:50:37.20

Mickelson, Christopher

And of course, we'll have two small advisory group meetings between then, so hopefully that next large meeting will come back hopefully with the maybe what our.

0:50:38.40 --> 0:50:46.940

Mickelson, Christopher

Energy discount tiers are maybe percentages, maybe even show you some expected enrollment levels and things of that nature.

0:50:47.820 --> 0:50:48.180

Mickelson, Christopher

Uh.

0:50:48.890 --> 0:50:50.440

Mickelson, Christopher

And we may even have.

0:50:51.300 --> 0:50:57.690

Mickelson, Christopher

Demographic and customer information that we've decided on at that point, if not then.

0:50:58.580 --> 0:51:1.730

Mickelson, Christopher

Obviously that will get rolled to the Knicks large meeting.

0:51:7.200 --> 0:51:11.850

Pfordte, Byron

Yeah, I know. Shannon sends out an e-mail asking for.

0:51:11.930 --> 0:51:19.30

Pfordte, Byron

Umm topics for the next discussion or next meeting? I think it'd be safe to to add the the tiers.

0:51:21.180 --> 0:51:27.290

Pfordte, Byron

And and the demographic, or at least data fields for our applications and surveys.

0:51:28.470 --> 0:51:30.860

Pfordte, Byron

To to the list of topics for next week.

0:51:32.970 --> 0:51:36.720

Pfordte, Byron

And then I think we should probably continue discussing.

0:51:39.480 --> 0:51:40.170

Pfordte, Byron

And and.

0:51:40.920 --> 0:51:46.670

Pfordte, Byron

The month between now and then, you know, hopefully we'll have some time to get creative with.

0:51:49.120 --> 0:51:52.450

Pfordte, Byron

And and and. And honestly, we're have to rely, you know, because there is such a.

0:51:53.720 --> 0:52:7.570

Pfordte, Byron

A difference from one agency to the next, and the customers in the areas that you serve, we will need to rely on you for realistic metrics and and and goals for your agencies in this CBO program. So if you.

0:52:8.840 --> 0:52:12.370

Pfordte, Byron

Voiced interest in participating in that program.

0:52:13.320 --> 0:52:13.990

Pfordte, Byron

Please.

0:52:15.350 --> 0:52:16.180

Pfordte, Byron

Do think about.

0:52:17.340 --> 0:52:31.830

Pfordte, Byron

Some realistic goals that they can be achieved through that program, you know, knowing the budget and and your agency capabilities and we can we can discuss those and hopefully form some sort of.

0:52:32.320 --> 0:52:32.820

Pfordte, Byron

Umm.

0:52:35.550 --> 0:52:36.660

Pfordte, Byron

Plan for for.

0:52:37.440 --> 0:52:38.230

Pfordte, Byron
Measuring.

0:52:40.620 --> 0:52:44.380

Pfordte, Byron
Goals were each of you, and then you know, collaboratively what the whole program.

0:52:45.660 --> 0:52:46.500

Pfordte, Byron
Goal can be.

0:52:48.700 --> 0:52:49.460

Pfordte, Byron
Does that make sense?

0:52:52.620 --> 0:52:53.840

Lorena Shah
Yes, that sounds good.

0:52:54.490 --> 0:52:54.830

Pfordte, Byron
OK.

0:52:56.480 --> 0:52:59.850

Pfordte, Byron
And while we have everybody here and and and we're running a little short.

0:53:1.120 --> 0:53:3.170

Pfordte, Byron
Might as well ask if there's any other topics that.

0:53:4.500 --> 0:53:8.70

Pfordte, Byron
Anybody wants to add to next week's agenda or next month, excuse me.

0:53:16.750 --> 0:53:17.960

Pfordte, Byron
Those topics will likely.

0:53:20.450 --> 0:53:21.770

Pfordte, Byron
Take up a good amount of time.

0:53:25.420 --> 0:53:38.890

Pfordte, Byron
But again, Shannon will send out an e-mail if anything happens to pop up that you want to add to the agenda. You can do so then and I'll give one last call for any other general questions or discussion items from anyone.

0:53:46.940 --> 0:53:49.700

Pfordte, Byron

Alright, well then, uh, get about 1/2 hour back.

0:53:50.440 --> 0:53:52.150

Pfordte, Byron

Yochi will be disappointed, I'm sure.

0:53:54.40 --> 0:53:54.570

Pfordte, Byron

Have a good day.

0:53:54.0 --> 0:53:56.410

Lorena Shah

We'll fill. Amen. Thanks, Byron.

0:53:56.960 --> 0:53:57.800

Pfordte, Byron

Alright, take care.

0:53:58.430 --> 0:53:58.770

Lorena Shah

Like.

0:53:59.550 --> 0:54:0.120

Charlee Thompson

Thank you.

0:54:2.220 --> 0:54:2.800

Blattner, Lori

Thank you.

0:54:3.800 --> 0:54:4.240

Pfordte, Byron

Go back.

0:54:4.480 --> 0:54:5.90

Jose Alvarez

Thank you.

February 24, 2023

Ms. Amanda Maxwell
Executive Director and Secretary
Washington Utilities & Transportation Commission
621 Woodland Square Loop SE
Lacey, WA 98503

Regarding: UG-210755 Compliance Filing to Commission Request for Updates to Advisory Group Pursuant to Order 09

Dear Ms. Maxwell:

In compliance with Paragraph No. 78 of Order 09 in Docket No. UG-210755, Cascade Natural Gas Corporation encloses for filing the minutes from its February 22, 2023, WEAFF Small Group Advisory meeting. The following documents are submitted electronically as part of this filing:

- UG-210755-WEAF Agenda-2-24-2023.pdf

If you have any questions, please contact me at 208.377.6015 or Chris Mickelson at 509.734.4549.

Sincerely,

Lori Blattner

Lori Blattner
Director, Regulatory Affairs
Cascade Natural Gas Corporation
8113 W. Grandridge Blvd.
Kennewick, WA 99336
Lori.blattner@intgas.com

Attachment

WEAF Advisory Group

Agenda

February 22, 2023

KEY TOPICS: Decisions and general agreements, bill discount rate tiers, data to be collected by company and agencies.

GOALS FOR MEETING OUTCOME: Ensure agreement from key decisions and agreements, decide on bill discount rate tiers, develop list of data to be gathered by the company and agencies.

1. Recap of decisions and general agreements as of 2/8/23 meeting – Byron Pfordte

The group agreed we will utilize a tier structure with both FPL and AMI included in each tier.

There is general agreement among the group on the following:

- Customer self-attestation of income, HH size, etc.
- Establishing a post-qualification verification process.
- Post-qualification verification process likely to be conducted by the Community Action Agencies.
- CNG employees will qualify customers for Arrearage Management assistance and Bill Discounts.

Tillis, Daniel – The first topic was a recap of decisions and general agreements as of our last meeting. One of the things I want to talk about is the feedback on having more than one topic on the agenda. We are tracking our general agreements on our notes and agenda. We are going to move those over to a document where we just keep those separately. But for now, we will just leave this one on here until we do that, as a very quick topic to just remind us where we're at on these items. Hopefully, everybody had a chance to go through them, removing arrears management assistance for CNG employees, qualifying customers, but it's fine to revisit it separately later on during the Oregon management program, once we get there. For now, we will edit that to add to the build discount program. Before I moved to the second topic, does anybody have any questions on these four decisions/general agreements or anything you want to discuss on this? No.... OK. I know I said Byron was going to cover that but that was because I was going to be a little bit late for today's meeting, but my other meeting got cancelled. The other two topics, just to address Yochi more direct on the feedback of having more than one topic on the agenda, our thought process is for having really two agenda items that require some detailed discussion. For the second item for example, the build discount rate tiers, if we were to get to a decision early in the meeting before an hour and a half is up, then we could move on to the third topic. Or, if we get to a point on that topic where we can't go any further with it because for example, you guys might want to go back and work with the Excel document from Chris again, and then talk about it again in two weeks, then we could move on to item number 3. In the future, we will just list the others as if time permits so that we maximize the use of all of our time, and we can continue moving this these program design discussions along. So, unless anybody has an objection to that, we will approach it that way going forward.

Yochi Zakai - That sounds good. Thanks for setting that expectation.

Tillis, Daniel - We will move to the bill discount rate discussion, I will let Chris will take it over from here.

2. Bill discount rate tiers (see updated Excel document Chris sent separately) – Chris Mickelson

Mickelson, Christopher - For my understanding, the main piece the Advisory Group wanted to talk about was crossover. Are there specific questions you would want addressed before just hopping into it? Nothing, OK. It is kind of high school algebra, so I mean it's not really rocket science, I have notes indicated in the appendix section. If you go to the appendix section it's showing FPL to SMI, but you can do also the same math to AMI. It shows different counties, and Appendix B shows the math and how that works. They even have a crossover equivalent cutoff point and what the SMI cutoff would be for FPL and vice versa. So, that is these two tables, and these are referring back to this math, figuring out what those equivalents would be. If 100% FPL in Adams County, what would that be in AMI terms and in this case 38.4% is the equivalent to 100% FPL. And so, 200% FPL, what would the equivalent AMI be for Adams 76.9%. And then this one is kind of the inverse - if you have 80% AMI, what would that equivalent be in FPL and in this case it's 208.2%. So, it's looking at each and every county based off of simple algebra. You're taking UH-3 variables and solving for X in essence, and one thing we've talked about before is the more costly counties will have those different thresholds, and so part of the reason why we have these particular taggers or AMI crossovers is because some of these counties, for example, at 100% FPL, Snohomish would be 25.4%. While you'll notice, the others are up closer to 40% and so what would 80% AMI be for Snohomish? Well, that would be equivalent to 300 and 14.3%, so that's part of the reason we're trying to create these crossover points that could be more unified. Otherwise, we would have to eighty different discount rates within our billing system, which I don't think would be doable. So, any questions about crossover?

Lorena Shah - OK, I'm pretty clear on the math around the equivalencies. And so, then the crossover, I think I'm getting clearer on. I guess my question mainly has to do with the 80% and when we talk about that top tier, I can't quite remember where we're at with our tiers to be quite honest. If we were saying the top tier is 50%, so 80% or 200%. But are we talking about that being individualized in each county?

Mickelson, Christopher - I'll take a step back. So, tier one would be FPL at 25%, hypothetically, we haven't really come to a solid number yet on this first tier or 10% AMI. Now figure calculating for the individual county like Snohomish for example, which is the costlier, you would take that individual county, their income, their household size to figure out what their personal FPL and AMI would be. So, let's just say it calculated 15% AMI, they would fall into Tier 2 bucket and maybe on the FPL they were 60%, so we would give them the lower or better benefit based off FPL or AMI. That's how we've applied it in Oregon, and I would expect a similar treatment in Washington, if we all agree on that.

Lorena Shah - OK. Thank you. That makes sense. Appreciate it.

Mickelson, Christopher - Any other questions about tiers crossover, anything else? Yochi, I know you or the group asked to have this kind of breakdown. Did that help? Is there anything you want to walk through or discuss?

Yochi Zakai - I have to say I'm relying on others that I work with here because I was not able to follow that, I would encourage everybody else to just ask questions, and make sure that you understand what's

going on because I'm going to be relying on other CA's to provide feedback and make some decisions here.

Mickelson, Christopher - Anything else on crossover? Hopefully, people had a chance to read the report and see how that's done. By the way, the reason it is set at these breaking points is, it's taking the crossover mode of all of these counties to define where that crossover happens the most, and rounds to the nearest whole percent, at least for crossover breaking point. That's how we got the 10 that corresponds to 25%, 20 corresponds to 50 and so forth to 200 to 80.

Roberts, Andrew (UTC) - What is the purpose of this crossover workbook?

Mickelson, Christopher - Just to help show how we ultimately came up with this tier structure. Avista doesn't have AMI for the first four tiers, they just have 550, 100, 150, 200 FPL and 80% AMI for that last tier. The agreement for this group was to have FPL or AMI apply to each of the tier and we will take the lower of the two or the most beneficial calculation and then put them in that tier. In the future, like we do in Oregon, we'd have some kind of WEAf. We have the WEAf calculator, but we would have some kind of calculator where you pick your county, put in the household size and the monthly income, and then it's going to calculate your actual household FPL and AMI percentage. Our Oregon calculator is automatically based off these percentages and tells you which tier you qualify for.

Yochi Zakai - I want others to ask questions, but the other tab that I think it would be helpful if you could go over, is the assistance tab, and talk about where that comes from and maybe go over each of the data fields so we can understand what those are.

Mickelson, Christopher - Basically this assistance comes from the company. This is our own internal data. We're looking at county. This is the number of customers we serve in those counties, and the number of WEAf recipients within those counties. The WEAf total bill within that county, their total assistance they received, so total bill minus assistance will show you what was left. Then you have the number of LIHEAP recipients. See recording for examples.

Lorena Shah - So the things like the LIHEAP average assistance or the arrears level forgiveness, as it pertains to the dashboard, it's basically being used for informational purposes only, or are we thinking this will be part of how we calculate a future arrearage management program?

Mickelson, Christopher - I would assume it would. So, on here, it's kind of being used to see energy burden after discount and after additional assistance received, what their account balance would be and then what their energy burden percentages would be, based off what I've seen in Avista's program. I think this was one of the things Yochi brought up earlier, wanting to utilize other assistance first, that way not all of this energy discount burden is layered on strictly the customer. So, we're kind of utilizing all that federal and state or whatever funds available. I noticed on Avista, as they're doing their mock bill, trying to figure out percentages, is they take LIHEAP first before discounts get applied, and so the best way for me to model that was to show average bill, minus the discount. Then, energy burden afterwards and that bill then taking that same number kind of that average assistant to figure out what each of those of accounts, at different tiers, would likely have as their account balance. And so then based off that try to get to an energy burden percent overall program.

Lorena Shah - Just to clarify, currently the average assistance, the 374, that was an average of all three big heart, WEAf and LIHEAP, not just LIHEAP.

Mickelson, Christopher - Correct. Are we comfortable with this kind of tier structure, 5 tiers, Tier 1 being 50% FPL, 10% AMI and then Tier 2 up to between 25 and 50% FPL and 10 to 20% and so on and so forth or?

Yochi Zakai - I think I'm still not at a point where I'm comfortable being pinned down to an exact position on what each percentage should be. I think what you have heard agreement for in the past is continuing to support a general structure with about 5 tiers and corresponding FPL and AMI that increases as we go. As we're still figuring out how to use that large amount of information that you've provided us, to be able to use in this tool. Again, I don't think I'm comfortable saying a specific amount, but the general structure is in line with what we were thinking. And I can't say that I have specific objections now, just that it's taking a while for us to absorb all the information and all the variables that are out there.

Mickelson, Christopher – Ok. By the way, I added page numbers for references of where you'll start to find some of these things.

Yochi Zakai - I appreciate how you responded to my request to put in more precise percentage numbers so that we can look at 1 and 2% energy burdens. I was playing with some of the numbers and then nothing was moving because it was rounded to 1% or 2%. So, it's nice to be able to see how a little bit more of how much an impact that has.

Mickelson, Christopher - By the way, I noticed you asked for a unlock, I'm working on a protected sheet even here, so I'm not sure what exactly you're wanting it unlocked for. Maybe my previous version it didn't allow you to click in the cell to see where things were, but if that's what you were wanting this version should.

Yochi Zakai - I was looking at energy burden and I was just trying to change the format of the cells that didn't round to the nearest whole number, and I wasn't able to do that. I don't know if Corey or Lorena spent some time in the spreadsheet, and I don't know if there's anything else they were hoping to get that was being restricted as well, or anybody else that spent time, not just them.

Corey Dahl (PCU-he/him) (Guest) - That was really the focus of what I was hoping to get from the unlocked cells after we had our discussion.

Mickelson, Christopher - By the way, as a reminder, the green shaded areas, if you plug in numbers then it will flow through everything that's a non-shaded, or just a black font with white background. Those are typically formulas, so I try not to have people play with that, but feel free, you break it, you break it. I know we haven't moved to rate design, but eventually we will, and you'll see the drop down that says open, based off that, you can actually put in how you want that to be spread across customer classes.

Yochi Zakai - Can you remind me how the WEA tariff right now is spread?

Mickelson, Christopher - I believe that's a by them.

Lorena Shah - I just had a question in the energy discount section. So, the only one that we're able to manipulate right now is in Tier 1, the 25%. So, does 5100, 5200, do they go up proportionally? Is that how that's working, or can we go up to 45% in Tier 1, 20 In Tier 2, maybe up to 55 - or can we only change cell C28?

Mickelson, Christopher - Right now you can only change Tier 1 and that was to go lower, not higher. Part of the conversation I keep hearing is having a uniform program across utilities. Well, these tiers are what Avista has. So, if you did want that, it would take some time.

Yochi Zakai - So another question, what does adjusting the arrearage frequency do and what does that mean?

Mickelson, Christopher - I thought you didn't want to get into arrears.

Yochi Zakai - I don't, but now you have me just asking questions about what everything does.

Mickelson, Christopher - So if you open up the arrears piece now, by the way, arrears do not affect energy burden, you'll need to say yes so the dollar amounts flow in down to program costs. Frequency is how many times a customer can receive some type of forgiveness within a program year. Right now, I have it as one that I built this in because this has been a talk with Oregon, whether we should allow more than one within a program year. So, if you say 2, it just doubles what that overall program is by that frequency number because that's what you expect. Without official data, especially on customer breakdown or their actual average arrears, it's kind of the best we have at this moment. Once the programs in place, say three to five years, we'll have a lot better data and probably would go back and modify accordingly. Anything else? No.... Well I guess with that I'll turn it over to Byron.

3. Data Collection during Qualification Process – Byron Pfordte

- Data Fields to Consider (compiled from LIHEAP, PSE, Avista, and CNGC applications)

Primary Applicant Name	Secondary Applicant Name	Residence Address	Mailing Address
Marital Status	Language Spoken in Home	Ethnicity/Race	Employment Status
Phone (primary)	Gender	Date of Birth	Number of people in Household
Email	Account Number	Housing type	Time at Residence
Education Level	Household composition (ages, gender, employment status, disabled, vet, etc.)	Housing Status (own, rent, etc.)	FPL, SMI, AMI, HHI
Average Monthly/Annual Energy Costs	Additional Income Sources	Energy Type	Do you currently have a payment arrangement?
Have you applied for/received assistance in the last 12/24 months?			

Pfordte, Byron - We met internally and discussed some of these and from a security standpoint, whether we collect 1 piece of personal information or 100 pieces, the security measures would still need to be the same, so with that in mind we've gone through the list and are willing to collect, many of these are

optional. Anything that's not marked with asterisk, is something that we require from the customer applying for assistance. All of those with the asterisks would be presented as optional. We had additional income sources in that original table that I sent, but I don't think that we can really get into the weeds on our end with that. And my thinking is that through the application with the agency that information can be gathered much more easily, and the agencies are set up to collect that information already. So, I'll give you a moment to kind of read through this list and if there's any disagreement or agreement, please let me know your thoughts.

Yochi Zakai – Is that everything that was in the agenda, and then it looks like minus that one where you have the strike through.

Pfordte, Byron - Every field that was in the table. I just put it into a list form. It seemed a little easier to group everything that as optional and required together.

Lorena Shah - I just wanted to point out that currently though I know census is rethinking this, but race and ethnicity, those are two separate fields. Ethnicity, being Hispanic, non-Hispanic and then race being race.

Roberts, Andrew (UTC) - So just to be clear, these items are items that the utility or are data points that the utility be collecting, but the items that the asterisk by them would be optional for the customer to answer.

Pfordte, Byron - Correct. If a customer calls or through an online application, we would either ask the questions or present them in the form as optional, and then securely passed that information along to the agency. Handoff from us to the agency is a little more smooth, and as Lorena asked, to have information when they call customers and then also to expose these customers to as much of agency programs as they can apply for and utilize. So, streamlining that piece of exposing the customer to programs outside of what we're just offering, if they contact us directly for assistance.

Misty Velasquez Community Action of Skagit (Guest) - Although I would love to have all of that information up front, I think how many people live in the home should be a requirement because isn't that needed to determine what their income level based off of how many people are in the home?

Pfordte, Byron - Not for us, we just look at household income.

Tillis, Daniel – We will need the number of people in the household as part of the rate discount program, we collect that today in Oregon and that goes into our calculator.

Lorena Shah - You need it because your AMI and FPL is all based on household size.

Tillis, Daniel -I think one another thing I noticed, we probably don't need to collect energy type because we only have one energy type, we're not a combo utility in Washington. So I think we could take that off the list.

Yochi Zakai - Isn't that heating type? I could be wrong but how did the agencies use that?

Misty Velasquez Community Action of Skagit (Guest) - We have Cascade Natural Gas customers that do not heat with gas, they heat with another source, but they do have gas in their home for cooking. So, that would come into play with our LIHEAP program to determine whether or not they heat with electric.

Yochi Zakai - And is that what energy type is designed to collect? You're really asking what is the fuel source for heating?

Misty Velasquez Community Action of Skagit (Guest) - Yeah, that's what I would interpret it to be.

Tillis, Daniel - Since the customer is either going to our website or calling us when we're collecting this information, I think it would be an odd question to ask what their energy type is since we're their natural gas provider.

Pfordte, Byron - I think if it's heating type that would make sense.

Yochi Zakai – If you want to be a little bit more exact, you could say heating fuel source.

Mickelson, Christopher - That's what I was going to recommend.

Tillis, Daniel - Our CSRs would be able to see that because we list the appliances, the customers using their natural gas for the website wouldn't know that. But our CSRS could really answer that question on their own – they could just say “it appears that you use a furnace, a natural gas furnace for your space heating, is that accurate”, and confirm that we could set it up like that and it wouldn't sound as odd.

Yochi Zakai - I'm going to defer to others about what needs to be on the necessary list versus the optional list. I'm pleased to see that Cascade is willing to ask these as optional collect questions and pass that information on to the CA, so thank you for that. And that is something that TAP would support. The only thing that you are proposing not to ask at all is additional income sources. So, I guess what I would tee up for the CIA's is, is that necessary to have? I think that would be an optional question probably and would that be helpful to include or are we OK not including that?

Misty Velasquez Community Action of Skagit (Guest) - My concern would be with not having that if we are speaking with clients, if we were doing any kind of income verification for Cascade Natural Gas, and we're talking with clients and just having that additional income sources, in my opinion it's easier when we know up front what a client's income really is coming from versus going in blind trying to get information out of someone. If we're doing that when calling a client to determine whether they're for LIHEAP, we're going to be asking them those questions anyway, and then they're probably going to be upset with us because Cascade Natural Gas didn't ask us that information; why are you asking us that information? So that's where it's going to come into play.

Tillis, Daniel – I think part of that also depends on how the calculator ends up being designed. If the type of income impacts the calculation, we might have to collect that, so that might be one we want to wait to make a final decision on.

Lorena Shah – Currently the field is additional income sources. Am I missing a field on this list? Am I correct that there isn't currently a question about what type of income?

Pfordte, Byron - We have employment status. But beyond that, no, we don't have anything that addresses what we're collecting to qualify customers for LIHEAP, I really don't want the customers to be confused that when we ask these questions. Even if our representatives tell them on the phone specifically what this is for, it doesn't qualify them for anything other than our discount programs and eventually our arrearage management programs. There will still be customers who say, “I thought I qualified”. And so that's one of my concerns with collecting this type of information.

Lorena Shah - I would say this isn't being collected just for a LIHEAP application. Part of what I think Misty was getting to is that in order to do the eligibility verification, which may or may not come with LIHEAP, these fields are very helpful to begin that interview process. So I do think they're related to BDR, not something we're just collecting for LIHEAP. Some of them have different types of eligibility, which is why the importance of race and ethnicity, it is a little bit different than just for eligibility. These may help inform LIHEAP, but they're also what's going to help an agency complete the eligibility verification.

Yochi Zakai - Yeah, I would agree, Lorena. And emphasize the data and in response to Andrew's question, the data can also be used to assess program performance and the ability to reach folks in certain communities. If we're able to track that, then we'll know who we're reaching and who we're serving. And then also by comparing that to the demographic data of a county as a whole, or an area as a whole, then we can know who we're not reaching as well. Back to the additional income sources, what we have been discussing with PSC along the lines of tracking this, is that there would a check box in the application if it was an online application, that would just say I have these types of income, then list the potential types of income that there could be. This would be an optional question, but the customer could check by all the types of income that they do have and then that way you know, if they get selected for verification or they come into the CAA's for another purpose, the CA's will be ready with that information.

Tillis, Daniel - We're missing income on here altogether and it was probably just because it's a given that you have to have that to qualify, but we should probably add it just as a field that just to show we're going to collect it, and I'm not opposed to asking for the source of the income and then asking if they have any additional sources of income in the household. It sounds like those are questions the agencies ask and they could give us the options for customers to select from. I don't know why they wouldn't be willing to share the source of the income and if they have any additional income. Going back to the discussion around the purpose of collecting the information, I agree it's for purposes other than just seeing if they might qualify for LIHEAP. When we get to the point of starting to establish the processes for our team to qualify customers for the discount program, or potentially arrearage management, that we work together to help our team members with some verbiage to use as their entering into asking these questions because this is not data we collect today and that our team members discussed with customers at all. And so we have really no experience with that, so we'll want to lean on you all for help with the best way to approach that and enter into that conversation with customers.

Misty Velasquez Community Action of Skagit (Guest) - I just saw one more thing, so FPL, SMI, AMI, HI, whatever that is, in my experience, clients and people who are applying for these programs have absolutely no clue where they fall, in that, they just know their income level. So, to have that on there as a question that they need answer, it's going to baffle them, in my opinion.

Pfordte, Byron - That's why household in HI is there. Most people know what household income refers to and those were all presented on one line. As you know, optional fields for how to get that information if they don't know their FPL or SMI or AMI percentage, that's fine, they can just include their household income.

Lorena Shah - In my mind it would be easiest, how many people are in your household? What is your monthly income or whatever we decide for the time frame for income, not even mentioning what FPL, SMI, and AMI because it seems nobody knows what that is; totally confusing to them. For marital

status, can someone remind me where that one came from? Was that one that another agency suggested?

Misty Velasquez Community Action of Skagit (Guest) - I think at one time it was on one of the applications, LIHEAP board, PSE help or something like that. I don't remember what might have been on LIHEAP at one time, but I think it's been taken off.

Lorena Shah - I was going to say we don't collect that one and so I think that unless CNG finds a need for it, I think that one can be removed. The only way I could think of that one being helpful is when your primary is not the applicant, not so much with the actual household makeup or anything so.

Misty Velasquez Community Action of Skagit (Guest) - Wouldn't that be like a Co customer or something? I agree.

Lorena Shah - Exactly. That's the only thing I could think of it would be helpful for, but I think that one to me, since that's not something we're currently asking as agencies, doesn't seem like we should add it does. I don't think there's much of value added that one.

Tillis, Daniel - I'm good with taking it off.

Lorena Shah - I just want to add to that I'm thrilled that CNG is open to having these as optional fields. And thank you for that.

Tillis, Daniel - You're welcome. Any other questions on the list or anything you see missing or that's not really needed?

Yochi Zakai - No other questions really. I'll just loop back around to income and perhaps this is something that we can spend more time on later. But the vision that I have for this is really what is your household income. Hopefully having just checkboxes saying this income comes from, or includes, and then having all the apps in an optional place where people can just select what type of income their household income includes, then it prompts them to include those which will hopefully lead to more accurate self-attestations of income.

Pfordte, Byron - Do you have those additional income sources listed anywhere that our most typical, so that we can include those as checkboxes or drop down or wherever we decide to pretend to present it.

Misty Velasquez Community Action of Skagit (Guest) - Sure do.

Lorena Shah - Yes, we can provide that.

Pfordte, Byron - If you wouldn't mind sending those to me, I'd appreciate it. Thank you.

Lorena Shah - We can also send you the ED levels that are equivalent to the CSBG ones. We have everything pretty much for household composition.

Pfordte, Byron - Anything else on this? If not, there was a topic that we were discussing right before this meeting and it doesn't have to do anything with it, but I know Chris wanted to at least introduce it.

Mickelson, Christopher - Who would have thought that we'd be so productive today? This kind of goes back to earlier conversations related to the WEA benefit calculator. I don't know if you remember that within the old calculator and also within Jean Lew's Commission staff testimony it talked about annual

cost times 62%, and then whatever that amount would have been was applied, but the calculator later actually did this divide. One thing this came up over the last week, we start getting questions from some agencies asking is this cost really the backup costs and well yes, based off dividing it by a lower percentage, it would make that average cost higher. Then we started looking at what's our average residential annual bill. And so that's what this amount is, this percent is showing what this backup gas cost is calculating over what that average Cascade residential annual bill is, so we're seeing some of these backup costs. Almost every county or every agency and county except for one is substantially higher than what our average residential bill is, so I was thinking that's probably not correct, especially since if you do have backup gas costs. In all likelihood, I would expect to see the western side of Washington state, at least gas costs, heating to be lower than that on the eastern side, where it gets much colder, and we're not seeing that, we're seeing the opposite. In addition, this is almost 78% greater versus what we typically see for residential, that's pretty extreme. So, instead of, and of course all of this comes from Department of Commerce, separating the agencies and figuring out these average heating costs, could we substitute and use Cascades annual average residential gas costs, divided by 62. Plus, we wouldn't have to wait on Department of Commerce to fill out this information, which held us up this year and in previous years. We already have this number, which we calculate at the time we do PGA, which is also right around the time we do our program, beginning of program year. We could just plug it in and that is what would be used as the average backup gas costs. Thoughts? Please speak up.

Lorena Shah - Historically, PSE gives us the backup that it is not calculated individually for each county. So, I don't know if their calculation is very similar to your calculation, but I just want to say, the concept of you giving us this number based on some level of calculation that the agents or that the company does, seems very reasonable.

Yochi Zakai – The \$902 that you're talking about using, is that the average known low-income bill or just the average customer bill for all customers?

Mickelson, Christopher - That is the average for all customers. You actually wouldn't really even need to ask for the household type because it includes all possible dwelling types, which is another thing that could increase or decrease this number.

Yochi Zakai - Would the average bill for known low-income customers be higher or lower than the average bill for all customers?

Mickelson, Christopher - Lower. I'm considering low income and then the average is 607.

Yochi Zakai - And that's the average before any assistance?

Mickelson, Christopher – Yes. Any thoughts? Decisions, maybe make that correction? Do we want to bring this up at our next full meeting and then implement it if possible, or if we get consensus.

Lorena Shah - I think that feels like a fully YAC consensus question.

Mickelson, Christopher - OK.

Lorena Shah - Can we look at the county-by-county backup that you pulled up? The heat cost back up that you had in there, so that average bill, is that total bill or heat cost?

Mickelson, Christopher - Total bill.

Lorena Shah - And then if we look back at the LIHEAP cost table, those should be actual heat cost. You know, average heat cost of LIHEAP recipients. It's just interesting that those are almost as much as the total bill. Regardless, I think we're on the right track, though. If you're 902 that that seems like a reasonable starting point. So, I just wanted to look at that one more time. Thanks.

Mickelson, Christopher - I don't know where that 62% came from, but cooking is a very small piece of a total bill, and water heating adds on average about an additional \$5 to a monthly bill. And so having this represent that averaging cost, that would be your largest portion of the bill. And those are typically the three applications we see for natural gas. We will put this on the large advisory meeting to discuss changing that.

Tillis, Daniel - Our last topic is just what we want our primary topic to be for the next meeting of this group 2 weeks from today. It sounds like the group wants to review the calculator a little more and then discuss that again in two weeks to try to get to a final decision on those tiers, is that correct?

Yochi Zakai - Yes, thank you for your patience. As we absorb lots of information that is included in that very useful tool.

Tillis, Daniel - OK, great. Yeah, it's a great calculator. Chris did an awesome job without our spreadsheet. So, any other topics that obviously will be a big topic, and I think it'd be great in that meeting to maybe get to a final decision. I'm not necessarily saying we have to have any other topics, but is there anything else on anyone's mind that you don't you'd want to add as a second if time permits topic?

Yochi Zakai – It seems like we've started to get into types of income, how we're going to do the income calculation that came up a couple times in today's conversation. Would that make sense to tee up as the next item since we've already kind of started talking about it a little bit?

Tillis, Daniel - I think that's a good idea. It's probably one that is a second if time permits, we could at least start getting into a little bit more and then continue in the next meeting. Well, if anybody thinks of any other topics you can always send an e-mail and we'll adjust and distribute the agenda the Friday before the next meeting, which is March 8th.

Mickelson, Christopher - For March 8th, is the group thinking like scenario testing that you come up with, or send to us in advance or how are you envisioning that?

Yochi Zakai – I actually don't have a vision. I am sorry, but what I can commit is that I will spend a lot of time over the next two weeks talking with my colleagues and looking at the calculator and thinking about it, and come prepared with either more questions or a proposal. But I don't have an exact vision of how that would go. If others do, I'm open to hearing that, but I'm sorry I don't have an exact vision.

Mickelson, Christopher -That's helpful. That works.

Tillis, Daniel - All right, great discussion today everyone. Thanks a lot. We will talk to you in a few weeks.

4. Set key topic(s) for next meeting – Byron Pfordte

List of program design topics agreed to by group:

- Arrearage Management and Rate Discount Design
 - Design of income-based tiers
- Joint administration between utilities and community action agencies (CAA)
 - Ensuring utility-enrolled customers can access other services, including LIHEAP, weatherization, childcare, rental, banking, water assistance, etc.
 - Tracking number of customers enrolled by utilities that proceed to CAA intake.
 - Information sharing, i.e., individual customer demographics provided to CAAs.
- Enrollment
 - Self-attestation of income/HH size
 - Audits for verification
 - Type of income, length of enrollment, processing changes in income, time to provide documentation, selecting customers for audit, etc.
 - Use of categorical eligibility to either very incomes or enroll customers.
- Utility and CAA design a joint communication plan documenting:
 - Program launch, informing customers they are selected for audit, informing customers they are not income-qualified, and responding to media inquiries about eligibility and fraud.
- Managing overlap between LIHEAP and bill discount program; developing a plan to maximize use of federal funding.
- Reporting

March 17, 2023

Ms. Amanda Maxwell
Executive Director and Secretary
Washington Utilities & Transportation Commission
621 Woodland Square Loop SE
Lacey, WA 98503

Regarding: UG-210755 Compliance Filing to Commission Request for Updates to Advisory Group Pursuant to Order 09

Dear Ms. Maxwell:

In compliance with Paragraph No. 78 of Order 09 in Docket No. UG-210755, Cascade Natural Gas Corporation (“Cascade”) encloses for filing the minutes from its March 08, 2023, WEA Small Group Advisory meeting. Additionally, Cascade encloses for filing the minutes from its March 15, 2023, WEA Small Group Advisory meeting. The following documents are submitted electronically as part of this filing:

- UG-210755-03-08-2023-WEAF-Agenda-3-17-2023.pdf
- UG-210755-03-15-2023-WEAF-Agenda-3-17-2023.pdf

If you have any questions, please contact me at 208.377.6015 or Chris Mickelson at 509.734.4549.

Sincerely,

Lori Blattner

Lori Blattner
Director, Regulatory Affairs
Cascade Natural Gas Corporation
8113 W. Grandridge Blvd.
Kennewick, WA 99336
Lori.blattner@intgas.com

Attachment



**WEAF Advisory Group Meeting
March 15, 2023 2:00 – 3:30pm Pacific**

Welcome and roll call – *Shannon Steed*

Advisory Group Member	Contact
Blue Mountain Action Council	Sylvia Schaefer, Estella Avalos, Kiana Romero
Community Action Connections	Dalia Ochoa
Community Action of Lewis, Mason, & Thurston Counties	Dale Lewis, Sandra Koch
Coastal Community Action Program	Debbie Gregg
Chelan-Douglas Community Action Council	Vern Gurnard, Kristi Hills, Alan Walker
Kitsap Community Resources	Kandi Balandran
Lower Columbia Community Action Center	Deanna Dahlberg, Kathy Bates
NW Community Action Center	Jose Alvarez, Todd Hilmes
OIC of Washington	Heidi Silva, Casandra Ochoa, Candi Jaeger
Opportunity Council	Marie Stangeland, Lorena Shah
Community Action of Skagit County	Misty Velasquez
Snohomish County Human Services Dept	Constance Hockett, Manu Morgan
WUTC Staff	Heather Moline, Andrew Roberts, Andy Sellards
The Energy Project	Ross Quigley, Yochi Zakai
Public Counsel	Corey Dahl
NW Energy Coalition	Charlee Thompson
Department of Commerce	Michelle DeBell
Cascade Natural Gas	
Mark Chiles, VP of Regulatory Affairs & Customer Service	Lori Blattner, Dir Regulatory Affairs
Dan Tillis, Dir Customer Experience	Chris Mickelson, Mgr Regulatory Affairs
Byron Pfordte, Mgr Customer Experience	Noemi Ortiz, Mgr OR Conservation & Weatherization
Shannon Steed, Consumer Specialist	

1. Company update
 - a. Small group meeting update – *Chris Mickelson*
 - i. Goals and Decisions document

Mickelson, Christopher - Basically the last meeting we showed this document. It's a program design consideration, key decisions, and agreements, so we're documenting everything here. By the way Yochi, I think I captured your edits from our small meeting last week. We want to stabilize household finances, joint communication, and information sharing. This is a high-level overview of the overall low-income program goals and what we're trying to accomplish, the action items we need to accomplish within a very short period to ultimately get this in place, the key decisions and agreements, and when that was done. Any questions?

Tillis, Daniel - I don't have any questions, but I think we covered a lot of those key decisions and agreements in our last full advisory group meeting, but briefly going through those, we will implement a bill discount rate and have agreed that there will be a tiered structure. Right now, we're looking at 5

tiers, but nothing has been finalized within the tiers as far as the percent of FPL and delineation between each tier, or what the bill discount percentage will be for each; but we have agreed that there will be a tiered approach that considers both FPL and AMI within each tier. We have agreed that we'll move to customer self-attestation of their income and household size, we still need to determine how that process will work. We've also agreed that we'll have Cascade employee's start qualifying customers for bill discounts and potentially other assistance as well. With self-attestation going into place, we've also agreed that we'll have a post qualification verification process. All of the details of that are still to be determined and then that process will likely be conducted by the Community Action agencies as far as the post qualification verification process. I just wanted to give a quick summary of those key decisions and agreements, because I can't remember if we covered them last time. We wanted to make sure this group was aware and then see if you have any questions.

Mickelson, Christopher - We did cover it last time, plus people have probably seen it within our previous agendas.

Tillis, Daniel - So any questions on anything that's on this document at all or anything that I just went through on those key decisions and agreements? We can send this out with the meeting minutes from this meeting, so if you want to review it more at that time and let us know if you have any questions, that works as well.

2. WEA Calculator proposed revisions to back-up heating – *Chris Mickelson*

Mickelson, Christopher - I think with that we move on to the next agenda item, which I believe is also me, the WEA calculator. Two items on the WEA calculator, there was a request to update where you put the current month and then have all the other months automatically filled in. Or we can go back to other approach where you put in January through December. I've added that request in, so I'll be sending that update out soon, but the other aspect is readjusting this backup cost. As you'll remember, I think it's been about two months now since we talked about backup gas costs and how it is based off each individual agency's average heating costs, but there was a formula where previous UTC staff Jing Liu, in her testimony indicated she would times that by 62%. However, her actual formula was divided by 62%. Dividing by 62% creates very large backup costs, which are in this case 78% higher than an average residential cost. So, our proposal is to take the overall average Cascade residential gas cost and use that in blue of each individual agencies service areas, hypothetical calculation. This approach is very similar to what PSE does, so if you are okay with that, we'll make that adjustment. The nice thing about doing this adjustment is we can get rid of these two input toggles because this average already is taking the overall service area and is based off of all types of housing, so we won't need these two toggles anymore. It should make this worksheet more streamlined, and we will no longer have to reach out to Department of Commerce in November to get this information, which during the new program year, delays getting the calculator out to people. Any questions on that, if not, we will move forward with both proposals. I should be able to get the revised calculator out by the end of this week.

Morgan, Manu - So the calculator I am fine with. I don't know if this is a part where I stretch out a little bit because I go to the CNG website to get a 12-month year usage, are there any plans to change it so we can get an excel spreadsheet versus having to pull out all the payments? A lot of times with PSE, I do the excel spreadsheet, copy the numbers and then I put it into the determination, so it's quick and easy. I don't know if this is the time to bring that up or not, but since you brought this up, that's why I asked.

Mickelson, Christopher- Are you talking about getting this information through our portal? If so, Shannon or Dan may be able to answer that.

Steed, Shannon – Yes, I can certainly submit your request to our development team and ask them if they can separate usage and payment history so that they are not all mixed together.

Morgan, Manu -Thank you, Shannon.

Mickelson, Christopher - Anyone else?

Yochi Zakai - I know I've asked this before, but for transparency because this is a different group, can you remind us how the average customer usage here compares to the known low-income customer average use?

Mickelson, Christopher - I believe this average is 906. And if I compare that to somewhere in the 839 range, the overall system average is slightly higher than our current low-income average.

Yochi Zakai - Great. Those are the two numbers that I think we should consider when setting this, I'm comfortable moving forward with the average customer, which is a little bit higher, and will provide a little bit more customer benefit there. Thank you.

Corey Dahl (PCU-he/him) (Guest) - I echo Yochi's comments about the average customer. I think there are some benefits there using that number.

3. Unresolved items from the previous meeting / Dedicated discussion of an agreed upon topic

a. WEAF vs AMP

Tillis, Daniel - I think the next couple topics are really Chris and I together. The third topic on the agenda, Byron's name is listed by part of it, but Byron had an activity with his kids, so he won't be with us today. The third topic is unresolved items from the previous meeting or dedicated discussion of an agreed upon topic, we have three items listed here. The first one is WEAF versus AMP, I'll try to frame this discussion and provide an update on where we're at for the larger group here. As we've been working on our bill discount rate program development, the company had a position going in to eliminate WEAF and implement a new arrearage management program to help customers with past due balances, and then have the bill discount rate help customers with future discounts to lower their future energy burden. A couple of weeks ago, Yochi and I talked, and he asked if we could revisit options for what the component to a bill discount rate will be, from an energy assistance program standpoint. Yochi shared with the group last week that Puget Sound Energy is leaving their PSE traditional ratepayer or historical ratepayer funded energy assistance plan in place as they implement their build discount rate plan, while Avista is generally eliminating their historical ratepayer funded energy assistance program while they implement their bill discount rate program. And they're replacing LIHEAP with their LIRAP program, an arrearage management plan or program. We discussed that last week in the small group but did not come to a decision, we talked about benefits of doing it either way and right now we're still considering those options, and we'll continue the discussion next week in our next small group meeting. I think it's a good topic for this group, to see if anybody has any strong opinions either way to share, since not everyone is on those small group meetings. Do we keep WEAF as is, as we implement a bill discount rate program, which would possibly mean the bill discount rate percentages are a little lower than what you've seen from Avista or go with just eliminating WEAF. We would implement an arrearage management program, where arrears would be completely forgiven, likely for anybody under 50% FPL, and then a partial forgiveness for customers from 51% to 200% FPL or 80% AMI with the remaining balance being spread over 12 months evenly with customers, making a small contribution toward the arrearage as long as the customer honors that agreement. Then, they get forgiveness for those customers between 51% and 200% FPL. Anybody from the small group have any additional thoughts since last week? No...OK. We will continue that discussion in the small group next week and then in our next full group meeting and provide an update on our recommendation, hopefully as a consensus recommendation as a group.

Moline, Heather (UTC) - I would appreciate a summary of input you did receive at the small group meeting, or if you just want to say, here are our thoughts so far on the costs and benefits of each option. I heard you say bill discount rate percentages might be a bit lower if you continue to operate the WEAF program. What other sort of considerations have folks brought up about the why on why not to these?

Tillis, Daniel - I could forward you the meeting minutes from that small group meeting, and you could read through those, they are extensive, and I'll try to summarize a little bit. If we work with an AMP, because the AMP would require a customer to be past due to get that help, that's kind of the negative of an AMP. The AMP would wipe out the entire past due balance for the lowest income customers. And then, not provide any assistance for future bills because it would not allow a credit on the account and that would lead to the bill discount rate percentages being higher because we're then applying those entire percentages to help reduce the energy burden in the future. Whereas if WEAFF were allowed to continue to be in place and allowed to continue to create a credit balance, which today can create a credit balance up to \$300.00, we would likely need to adjust to those bill discount rate percentages down to make sure we're not giving a customer a negative energy burden, for example. That's why those BDR percentages would likely be higher for an AMP with bill discount rate, versus a WEAFF with the bill discount rate. I think that the company's position is that we recommend that an AMP replace WEAFF as we believe the AMP helps pass energy burden, and then the bill discount rate helps future energy burden. So, we address both past and future energy burden for customers qualifying for assistance varying levels depending on income obviously and the FPL AMI. Then we also have winter help that could work in concert with those programs to provide crisis assistance or fill some gaps that maybe are left. The combination of those two programs, I think, and I'll defer to any of the agencies or Yochi or Cory, but I think some of the proponents of keeping WEAFF in place was that it does create a future credit that could help the customer immediately with future bills and maybe give them zero bills for a period of time, whereas a bill discount rate may only give a discount up to say 95% for the customers in greatest need of assistance. That was the biggest positive of keeping WEAFF in place that I can recall.

Moline, Heather (UTC) - Well done. Thank you very much.

Corey Dahl (PCU-he/him) (Guest) – Tagging on to that, regarding keeping WEAFF in place, I think part of the benefit of combining a WEAFF grant, in addition to what you had indicated, Dan, if we keep WEAFF with the discount, it also helps control seasonal variation in the size of bills and capture differences as a result in increases in consumption that happen on a seasonal basis. So, it's just a bit more of a robust approach to maintaining affordability. In an additional comment in terms of an arrearage management program, it's my understanding that the company is still proposing some sort of a onetime grant that would be applied to help take care of arrearages on accounts versus the more commonly considered arrearage management program, which would be a payment plan that as long as customers pay a small amount of their arrearages over a certain time period, then their overall arrearages would be zeroed out after say a 12 month period of making timely payments. So just to make sure that we're on the same page understanding what basic program design elements the company is considering.

Tillis, Daniel - Good points to bring up as far as the original arrearage management program. The company's initial preference for an AMP was to provide the arrearage forgiveness up front for all customers, and not require any portion of it, whether it be the arrearage forgiveness on the company's behalf for the customers commitment to be spread over a set of months in in 12, being the example in this case that I think is most commonly used. Our thought was just to give the customer the immediate help, get them either fully out of arrears or a long way toward that and then give them the bill discount rate to keep current and future charges down, so they could actually manage that. We recognize that when we initially brought that up other than the discussion about that not being really an AMP, there was also proponents of the other method of spreading it out over 12 months. I think the main reason was customers get used to paying their bill, their current charges plus their commitment on the past due amount. We're open to either, we've started exploring systematically what it would require for us to have a traditional AMP where it's spread over say 12 months. It is a lot more work for us systematically and our estimate from IT is 6 to 9 months to get something like that in place that is automated. If we go that direction, we'll have to likely start with a lot of manual work in place and then move to more automated when we get that work done with our systems folks, but good point, Corey. It's definitely

both options that we still haven't made a decision as a group on for sure. Chris, I think 3B would be something you would cover. I don't know if you just want to share briefly what the energy discount tiers look like again and program cost, but we haven't made a decision on 3A, so I'm not sure that's really appropriate today.

- b. Energy Discount tiers and program costs
No decisions, moved past this one
- c. CBO Program Development
 - i. Agency feedback for programs goals and individual agency budgets – *Byron Pfordte*
- d. Data fields for applications and surveys – *Byron Pfordte*

Mickelson, Christopher - Sure, I can do that.

Yochi Zakai - We can pull it up. I don't think it's right for consideration because we don't really have any specific other proposals that have been put out yet at this time, so it might be a little premature.

Mickelson, Christopher – Alright. if that's the case, do we want to just move on to the next agenda item and we'll save it for the small group?

Tillis, Daniel - I think you want to leave the spreadsheet out there because you have something on the right side that is relevant. Last full advisory group meeting you all talked about the CBO program, community-based organization program. I was not on the meeting, but I did read through the notes and so I'm familiar with the discussion. We had four agencies volunteer to be part of the required CBO program this year. And we've been a proponent of one for a few years now so, even if it weren't required, we'd likely still be having this conversation. Those that volunteered were Blue Mountain Action Council, Northwest Community Action Center, Opportunity Council and Chill and Douglas Community Action Council, hopefully you remember volunteering. We were required to invest \$73,000 out of the WEAFF fund into community-based organization program in 2023 so Chris took the liberty of allocating the \$73,000 minimum to those four agencies and Chris, you might want to just cover really quickly how you did that before we continue the conversation.

Mickelson, Christopher - It's an equal weighting based off the number of Cascade customers that are served in the counties the agency serves and the number of counties that participate. And so based off that, you get these percentages. Then out of that \$73,000 this is how much each of those agencies would get.

Tillis, Daniel - The company is ready to start moving forward with getting a CBO program in place and partnering with these agencies to do that. We've had a lot of the conversation during the last meeting centered around reporting that could be in place for the CBO and for the agencies who are participating in the program. Lorena sent out an example of CBO reporting that Opportunity Council had been receiving as part of the Emergency Rental Assistance Program. I thought there was a lot of good input that they received as part of that program from the CBO's. I think that's definitely something we could work with, Cascade also feels there's a need to get reporting from the agencies themselves on whom they're allocating funds to, kind of general use of those funds, some data around activity from those CBO's. I think we still need to determine what reporting we need. I have two questions, 1) have any of the agencies thought about this more and decided you might want to participate as well in 2023? If so, let us know here or shortly after the call. And then 2) do we want to try to get that reporting all in place in this large group meeting, or if we end up with four or five agencies who want to participate, just get those groups together and work it out with them? I don't want to waste anybody's time, though. If we don't want to have the other eight or so agencies on the line when we're working that out.

Yochi Zakai - Thank you for reviewing and supporting the template that Lorena has been using for Opportunity Council. I agree if we want to keep on working on program development here a smaller group to work through some of those other details. But I do think it would be important to continue to invite the other advisory group members that might be interested to attend as well. Some probably

won't be and that's OK. I think all four agencies, at least as I understood it, expressed an interest in looking into this and so perhaps all four won't end up moving forward, hopefully we can be flexible in terms of reallocating the dollars if one agency decides they don't want to move forward.

Tillis, Daniel - For sure, I think we could reallocate if somebody decides that it's no longer of interest to them for this year, as long as we know that before we allocate the funds.

Mickelson, Christopher – It is equally weighted as I described, it automatically does that based off of an agency dropping out or gets added because it also reflects how many Cascade customers get served in those counties.

Tillis, Daniel - Maybe I make a recommendation here that the agencies consider whether or not they want to be part of the 2023 CBO program and let us know by Friday of this week. If we don't have anybody drop, or we have some added in by Friday, we'll set up a meeting for shortly after that with the agencies. We invite all of the agencies, but those that have not indicated they want to participate we will list as optional, and work with those agencies who will participate to finalize reporting to get the CBO program started. Does that sound like a good path forward? OK, hearing no objections, please let Cascade know by Friday, if you're one of the four that did volunteer but are no longer interested, or if you're not one of the four, and you would like to join in, e-mail Shannon, me, Chris, or all of the above. We will get that list finalized and then set up some additional time to with one or two meetings at the most to get things going and funds in your hands and to the CBO for them to work with customers. Our last item that's actually on the agenda before we open it up to any other topics and I'm going to share my screen is on the customer data collection and this is as we move to implement a new energy discount program. This is data we're considering collecting as part of the application process from the customer either from Cascade agent, if there are qualifying the customer over the phone, or on our website if the customer is applying through our website. This is a spreadsheet we are working with right now internally at Cascade. We've had this discussion with the small group, and I think we've gotten to a good point with the small group where we're probably 99% in agreement on what we're going to collect and working out some details on the finer points. We thought it was good time to share this with the full group and get feedback. On the far left is just the category of data, if it's highlighted in yellow, that simply means that we already store that data in our Oracle CC&B customer information system. As you can see, we're going to have to do work to add some of this information in our CC&B system, and we'll likely want to hide some from our internal employees, so that they're not viewing data that's really not necessary for them to do their job. The middle column are the values that would be associated with each category of data. So marital status you can see married, single, married with a divorce separated and so on. And you can see that for many of the categories that have options that would be associated with them that aren't already in CC&B, and then just so you know that the agencies who are part of the small group have given us these fields so hopefully those are in good shape. And then these are just any comments which there's not a lot right now that was relevant to leave on here for this group. The one category we did have questions on since our last small group meeting which we discussed this topic was on household composition. Our understanding of this category of data was that for each member of the household, we wanted to get ages, gender, unemployment status, disabled status, veteran status. Was that an accurate understanding of request? The reason I ask is because this is going to be very difficult for us to put into our CC&B customer information system and so our preference would be to either eliminate it altogether or just change it to a number of dependents or something less data intensive. It doesn't feel that all of this data about each individual in the household is demographic data we necessarily want to analyze down to that level of all the status of every individual that lives in the household for their employment, and if they're disabled or not. Would there be any objections to just changing that field to number of dependents or something else, or removing it altogether?

Yochi Zakai – I'd like to pose this to the Community Action agencies. Can you describe what information you collect today about household members so that we can understand why the current practice is a little better.

Sylvia Schaeffer - We collect a lot of data, but I'm a little bit confused under education level and then it has the ages, gender, employment status, disabled, vet. We do collect all of that information for our reporting here at BMAC. But I mean I don't know that it necessarily needs to be on this sheet, that's my opinion.

Yochi Zakai - So for each household member, do you normally go through each household member and collect the age, gender, and employment status and such?

Sylvia Schaeffer - Yes. For each person in the household, we have to click down on an answer. All the questions, education level, sex, gender, whether they're employed or not employed.

Yochi Zakai - OK. And at the very least you want to ask about each household members employment status because you want to make sure that you're capturing all of the potential income sources, right?

Sylvia Schaeffer - Yes.

Yochi Zakai - So then you would be asking about disabled and vets' status also as kind of a prompt to make sure that we're considering all potential income sources from SSI, if they're disabled, or veterans benefits I assume?

Sylvia Schaeffer - Yes, so even if there's a child, you have to answer not in a workforce. Everybody entered into our database has that information. We track that information for CDBG and all of those reports. There's a lot that we do when we enter our services.

Yochi Zakai - And then knowing about children is important to ask, because then that triggers you to ask questions about if they're receiving child support and then you're making sure that that's included in the income as well, right?

Sylvia Schaeffer -Yes, that's part of the intake process, correct.

Yochi Zakai - Thank you for helping me think through that because I don't know all this off the top of my head and I normally rely on Lorena and she's apparently at the doctor's office with a daughter that has a broken arm. But that conversation kind of reveals why I think it's important to ask most of those questions, and that is related to making sure how we are determining income. And then there's some demographic information in there as well. That's helpful to make sure that we know the populations that were serving. And it's only when we track the populations that were serving can we understand the populations that we are not serving by omission. When we compare, the data of who we're serving to the data of what our community looks like as a whole, those are the reasons why I think it would be important to collect that information. And that being said, I think we are open to different ways of collecting and transmitting that information to the CA's so it can be used both in the income verification and in the demographic reporting activities. And we're open to working with Cascade to figure out ways to do that, which would be less burdensome and not require as much work with the systems as was originally anticipated.

Tillis, Daniel - Sylvia, can I ask, do you all ask those household compensation questions because it's required as part of the LIHEAP qualification process or any other requirements because it's not required as part of WEA, right?

Sylvia Schaeffer – Yes, it is LIHEAP asking all those questions for each household member.

Tillis, Daniel - OK. We're not going to have Cascade employees qualifying customers for LIHEAP, so that requirement won't exist. The other consideration besides just the system for us is, you we don't want customers waiting a significantly long time to talk to our team members, the more questions we ask, and especially if we ask for several people in the household it's going to take us more time to do that. So, with the system work as well as the amount of time, it would be optional for the customer to answer since it's not required as part of the qualification process outside of LIHEAP.

Yochi Zakai - I agree it would be optional, but again I want to emphasize that I think it's important because you know for both setting the agency up for success in terms of entering into the verification process and making that easier to get information from customers when they are first in contact and asking for help. Also, for demographic reporting to make sure that we know who we're serving and therefore by omission, who we're not serving with the program.

Tillis, Daniel - Looks like Dalia also put something in the chat that says the data is used for their agencies and Roma reporting yearly, regardless of Cascade. Using it, they would still need to collect this data. What is Roma reporting? I'm not familiar with that, can someone share?

Jose Alvarez (NCAC) - It's for the block grants that we received as Community Action centers.

Tillis, Daniel - OK. Thank you, Jose.

Yochi Zakai - That comes back to the Community; service block grants from the federal government, which are a significant portion of funding for the Community Action agencies as well.

Tillis, Daniel - So Dalia say we decided to remove that, and not saying we are, but if we did, then the agency would continue to collect that data to comply with LIHEAP requirements as well as the Roma reporting, so that makes sense. I'll leave it on here for now. Sylvia, do you think you could share the exact questions you all ask to collect data on members of the household, not the primary applicant, but just the other members of the household?

Sylvia Schaeffer - I was just looking at an application right now. The questions that we have to fill out on the live feed form are last name, first name, social security number, date of birth, relation to the primary applicant, gender, ethnicity, race, education level, disabled, military veteran (yes/no), health insurance (yes/no). That's basically what on the LIHEAP state application form that needs to be filled out.

Tillis, Daniel - Thank you. You don't need to send anything. I think we can get that out of the minutes for the meeting. That's a lot. Hopefully, as we've been having this discussion, you have all been able to look through this document. Moving away from the household composition topic for a minute. Any thoughts on anything that's missing? Any feedback you have at all on what we've currently agreed that we'll likely collect once we implement the energy discount program and whatever other assistance program, we have starting October 1st?

Charlee Thompson - I don't see anything that's standing out to me as I'm like looking down these rows of data. But I did just want to chime in and say that I do agree that it is important to know who we are serving and who we aren't, because it's important to have metrics of program success and this is one way to measure program success and determine where improvement should be made, so definitely in support of having or collecting data like this if I have specific feedback on missing data or something like that I can send that Cascades way, but that's all I have.

Tillis, Daniel - I will attach this document as well when we send out the minutes for this meeting so that you all have it to review and provide any additional feedback. I don't disagree at all that having demographic and excessive socioeconomic data is important to evaluate program effectiveness. I feel like we also need to balance that with the other things I mentioned, especially the average handling time for Cascade employee as they're trying to serve a lot of customers and potentially getting bogged down into asking 6 or 7 questions for maybe five or six members of the household. I'm just trying to balance that as well.

Corey Dahl (PCU-he/him) (Guest) – I want to start by saying I've appreciated the depth and detail of this conversation; it's been really beneficial. Just a couple clarifying questions here, are the additional highlighted yellow values under the person data column pieces of data that Cascade seeks to gather in addition to what agencies are collecting?

Tillis, Daniel - No. The field highlighted in yellow are actually fields that already exist in our CC&B customer information system today. The actual fields in white, not highlighted is data we don't collect today typically, and we don't store it in CC&B.

Corey Dahl (PCU-he/him) (Guest) - Got it. OK. That that makes more sense. I couldn't remember at the top of my head. And then in terms of the data values for gender, are those the values that are currently gathered by agencies and I ask because male and female are terms used to describe sex and not gender. I would also push for more inclusive values since some may identify outside the binary of manner. Woman being labeled as other is probably quite alienating, so I would push for more values to be put in there.

Tillis, Daniel – I can't recall if that's one that we got the fields from Lorena or someone else or if that's just what we put in there as a placeholder for right now, but share what you collect today for gender.

Sylvia Schaeffer - I'm sorry I missed that my phone was ringing. Did you say, what do we collect right now for that, that, that space?

Tillis, Daniel - For gender yes.

Sylvia Schaeffer - It's just those three that you have.

Tillis, Daniel - OK, so we did probably get those from Lorena then? I'd say we're open to adjusting if we have suggestions on making those changes, but that's why there are those fields, or those options are there.

Yochi Zakai - Are those perhaps the only field supported by commerce on the LIHEAP application? Or are there others that commerce would accept?

Sylvia Schaeffer - I would say they would have to adjust the form. We download from the state and the those are the three checks that you can have on that specific question, so I don't know if they would if they would adjust or not. I'm sure they would, but the at this point, that's on the LIHEAP state side page.

Yochi Zakai - OK, maybe this is something we should bring up to commerce because ideally what we have here would mirror the commerce LIHEAP forms as much as possible, so that when customers are applying for both the agencies don't have to make any changes to what they do, Corey, can I take as an action item from this bringing up to commerce.

DeBell, Michelle (COM) - As far as gender goes, we ask for what HHS asks from us. Now here's my understanding, but I cannot give you a timeline, those definitions may be expanded but I can't tell you to what and I can't tell you when. But those definitions are under discussion at Health and Human services for expansion, and I'm sorry I don't have any further information other than it is in process. I'm sorry to interrupt you but I wanted you to know.

Yochi Zakai - Thanks, Michelle. I appreciate that. I didn't realize you were on the call.

DeBell, Michelle (COM) - I'm sitting here listening.

Corey Dahl (PCU-he/him) (Guest) - I'll just jump in and just mention that's helpful information to have. Michelle and others, in terms of what these particular values are for and what set of data exists currently, there are conversations about expanding that and hopefully making it more inclusive, but also more accurate since it's my understanding that male and female are actually not terms to describe gender, they're terms to describe sex.

Tillis, Daniel - OK. Thank you, Michelle and Corey. Any other questions or input right now on the data that we're considering collecting and related values?

Moline, Heather (UTC) - When I was listening in to PSE's monthly meeting, they're doing a pilot where income is verified for a certain number of people who self-attest into the program. So just making sure I'm understanding what's going on here; Cascade is proposing to collect not just what's in yellow, which is already collected, but also what's in white for anyone enrolled in a bill discount program?

Tillis, Daniel - Correct. All of this data would be collected at the time of the application. Certain data would be required for qualification and to apply the discount to the account, we have the account number or they will have one when they become one, and customer name, address, things like that we have. But we also need household size and income to get their FPL or AMI. Those would be required fields and then most everything else would be optional for the customer to answer and then we would provide the data to the agencies in some way. If they end up being the organization that does the post

qualification verification process, similar to what PSE was talking about, then they'll have that data as they enter into those conversations with those customers.

Yochi Zakai - I think the conversations with PSE and Avista are landing in a very similar, if not kind of exactly the same place, where there would be a small set of required data from customers for enrollment and then a larger set of optional data to collect that would include geographics and most of the stuff on this list.

Tillis, Daniel - OK. Any other questions, input or feedback on the data collection that will likely end up occurring starting in the next program year. OK. That was our last topic on the agenda that was shared last week by Shannon. Any other topics that anyone wants to discuss. Any other questions anyone has?

Yochi Zakai - Can I suggest that we consider canceling next month's advisory group meeting and using the time either for discussions with just the agencies interested in implementing the CBO program, or for the small group because it seems like we're entering into a phase where we might need to have some more concerted discussions with the small group and it might be good to keep momentum up and to make progress with some smaller groups before coming back to the big group again.

Tillis, Daniel - I think that's a good idea. Anyone object to the idea presented? You could use next month to focus on finalizing CBO reporting or CBO implementation and reporting requirements or needs and other small group type topics.

Charlee Thompson - No objections.

Corey Dahl (PCU-he/him) (Guest) - No objections from public counsel.

Tillis, Daniel - Thanks, Charlie. Thanks Sylvia in chat. We'll plan to do that for the next full advisory group meeting. Any other questions or topics you want to discuss today? OK, thank you, everyone. Great conversation. Have a great rest of your day.

WEAF Advisory Group

Agenda

March 8, 2023

KEY TOPICS: New tracking document, WEAF decision, and bill discount rate tiers.

GOALS FOR MEETING OUTCOME: Finalize WEAF program status and possibly bill discount rate tiers.

Tillis, Daniel - A little bit of a shift from what we had planned to discuss this week, but these are important topics. Over the last several months Cascade has been putting together a document that covers our program; including design considerations provided by Cascade, and some documentation from the stakeholders late last year and earlier this year. We've added to that the list of key decisions or general agreements that we've had since we started these discussions, and so Chris is going to cover that for us today, it may need some editing. Yochi and I talked last week, and he wanted to have a discussion around a couple of options on how to proceed with WEAF, so that will be our 2nd topic. One option is to eliminate WEAF and implement a new arrearage management program, the other is for us to keep WEAF for now and just implement a bill discount program to work in conjunction with WEAF and then evaluate where we want to go in the future; Yochi will provide some more insight on that, hopefully we'll decide on that today. And that will dictate where we go in in our future meetings, then if we have time and it's appropriate based on the decision, Chris will talk about the spreadsheet. Again, he sent a separate document earlier today that he'll go through to explain the crossover and see how far we get into the spreadsheet. This was a topic that we put on the agenda after the last meeting. I find it unlikely we'll get to it, but if we do have time, then we'll talk about the bill discount qualification process and how we might envision that process working. I will turn it over to Chris to discuss our program design considerations and key decisions document.

1. Program Design Considerations+Key Decisions Document – Chris Mickelson

Mickelson, Christopher - The document is broken up into three parts. The first part are the goals of the Washington low-income program, the second is action items to accomplish the goals and the third part is the key decision and agreements that we've had so far, to help solidify them in a document. We all know when and what we agreed to, and now I'm going to go a bit in reverse. We obviously want to reduce the burden, keep customers connected, increase participation, and have this driven by data. We want this program to supplement LIHEAP and meet different requirements, whether that be Senate Bill 5295 or the CCA. Any questions on the goals or the key decisions and agreements?

Yochi Zakai - Thanks for taking the time with everything you've done over the past couple weeks, really appreciate it. No questions on the key decisions and agreements. With the goals, I was thinking about something that we could add; something that talks more holistically about financial stabilization because I think that is one of the things that the CAA's are trying to do. We shouldn't think about energy burden just at one point in time, but over a more long-term horizon which is implementing a discount as opposed to a single one-time grant, really covers the longer time

horizon. And, then thinking about stabilizing a household financially in more than just energy assistance, and that's not to say that the program needs to be designed to do that, but the program should be designed to support CAA efforts to do that.

Mickelson, Christopher - OK. So, you received this document, I think last Friday. Feel free to track changes, add or edit to this document and share with this group. The next piece are the action items; how programs interface, income eligibility, and getting more into those nuances. I looked at what Avista provided with their advisory group and a lot of these are what was covered as part of their program design. I took a lot of that and made it Cascade centric in our Washington low-income program design.

I won't go through each of these action items, they're pretty straightforward, but if anyone has any questions on them, please voice concerns or questions.

Yochi Zakai - What do you mean by marketability?

Mickelson, Christopher - I believe that was how the program gets marketed across our service territory and with the agencies.

Tillis, Daniel - I think it's also how attractive the program is to customers, and how do we design it and share the program with customers in a way that they respond.

Mickelson, Christopher - The program name could help with that marketability.

Yochi Zakai - So two things that have been important for the Community Action Agencies that I would want to be sure that we highlight here, joint communications plan; I think the way you're describing it, a joint communication plan probably should be separate from what you described as marketability. And then I would want to add, which we've discussed is Information sharing, a specific program design element that we would want to address and the referral process. Those things are a little bit related, but I think are separate items that I would include as distinct elements if I was coming up with a list.

Mickelson, Christopher - OK. Anyone else?

Tillis, Daniel - When we review the minutes, we can also use those to make the change in the first section or take a shot at making the change in the first section, and the other two changes in this section. We can send it out and see if we got it right or see if you'll need to edit it.

Mickelson, Christopher - I'm not sure if our goal is still to get this Washington low-income program in place for the next program year or what we would normally consider the WEAF program year, which is in October I believe, but if so, we're coming down to our last 6 to 9 meetings. So, depending on when we would need to file with the Commission a program, so it can get approved and still allow enough time for Cascade to take care of any back-office type issues, we'll need to make decisions.

Yochi Zakai - So the schedule that PSE and Avista are on, they're aiming to make a filing with the Commission, kind of describing where the program is on July 1st and then implementing on October 1st, which might require us to meet a little more often. If we are going to go for that goal, but I

would be supportive of trying to hit that same schedule to get the utilities in line in terms of the Commission process for approval.

Tillis, Daniel - I think that's the goal we've discussed internally as a July filing for October 1st effective date, I'm 100% behind that. I'd like to get a bill discount rate program in place October 1 this year, so I think that timeline takes us to the next topic because I think that's part of the decision as far as how we handle WEAFF, so if there's nothing else on the first topic, Yochi please share your information.

Charlee Thompson – I also support that the October 1st implementation.

2. Program Design Options (eliminate WEAFF or keep as is) – Yochi Zakai

Yochi Zakai - OK, as I was working with the program spreadsheet to figure out the discount tiers, aiming towards a design to provide the discount to minimize that burden, or put it at a certain percentage level, the thought came up what assistance programs should be included and excluded when we're considering energy burden for customers in each tier. I appreciated the revisions that were made to the spreadsheet so that we can now look at energy burden with the bill discount and then with the bill discount and with LIHEAP.

I think that what I was trying to wrap my head around is which one of those should we be aiming to include. And then the other decision in making that determination would be if the WEAFF program should continue, or not. Let me walk through the decision-making process that we've gone through with PSE and Avista on this same point and then we can discuss what the best thing would be for Cascade's program, any questions before we start? Talking about what the best thing for Cascade's program would be, Avista decided not to continue their traditional LIHEAP grant-based program and instead transition to primarily using just the bill discount rate. They established a bill discount rate looking at the energy burden to customers after the bill discount percentage. So, that was assuming there's no grant-based program and it was also not assuming that customers got LIHEAP and then they designed, as I understand it, their bill discount to minimize energy burden. Looking at just the impact of the bill discount rate and as a result, they ended up with some very high percentages for discounts that are provided, customers in Tier 1 and Tier 2 with the lowest incomes. As we've seen that's 94% and 75% and that's how they arrived at those numbers. Then when we were going through this process with PSE, we decided that we would retain the PSE Help program which provides usage-based grants like the WEAFF program. When PSE was looking at designing their discount tiers, they included both the impact of the bill discount rate as well as the impact of the Help program, then looked at the application of both of those programs, what is the energy burden of the customer. Again, assuming that LIHEAP was not provided to the customers, so I feel like at this point we're at kind of a similar decision point for the Cascade program. If we're going to continue WEAFF, it feels like we should design a bill discount rate that accounts for the fact that WEAFF is going to continue, or should we go more of the route that Avista went, and that Cascade was assuming we would go, and not continue the current WEAFF program and just have a discount rate that is designed to minimize energy burden. Assuming that the bill discount is the only tool that's there right now. I feel like I would be open to either of those. The other thing we've discussed is LIHEAP, and I think it's important not to assume that LIHEAP is provided because there are certain

customers who are not eligible for LIHEAP, and so for that reason, I don't think it's appropriate when setting the tiers to assume that a customer would be able to access LIHEAP. I hope that made sense and I would be happy to answer any questions.

Tillis, Daniel - I would add that the option to keep WEAFF and implement a bill discount rate is the approach we ended up taking in Oregon. There are a few reasons why we took that approach being a timing situation there as well, and in Oregon our program is considered temporary. Similar to the discussions we had late last year, but it's temporary in the sense that it's not like a one year and then we have to change it approach. It's temporary while we evaluate how it's working and make decisions on where we go for the bill discount rate and any changes to OLIBA which is the equivalent of WEAFF in Oregon. That is what we currently have in in Oregon with OLIBA still in place, works like WEAFF, and then a bill discount rate. Separately, we do qualify them together, so we have a calculator that can determine if a customer qualifies for an OLIBA pledge and at the same time, if/what tier of bill discount rate they qualify for. I would say if we went with that approach with leaving WEAFF in place in Washington, I would like to see us do that in Washington, not to get too far down the road. When we did make those changes in in Oregon, I'd say we made a couple of other changes also. At the time, our Cascade employees started qualifying customers for OLIBA and the bill discount rate program at the same time, and that's an important approach for the company because we just feel like we get to help a lot more customers sooner that way. That's another component I would like to see us have included if we decide to keep WEAFF. And I guess I would just add that based on the conversation we just had on the timeline, it may be tight getting a filing and go live for the bill discount rate program, I would be supportive of leaving WEAFF in place for now and getting all the details worked out for a bill discount rate program. Once we get that implemented, start having a conversation on the long-term future if we want to shoot for October 1, 2024, for arrearage management program or just evaluate it for a year or two to see how it goes and then decide where we want to go.

Mickelson, Christopher – Yochi, if WEAFF stays in place with an energy discount program, are there still the same cap limitations, same minimum thresholds? Do those get readjusted recognizing that these customers hopefully we'll have much lower bills and be good stewards of these funds, are look at maybe adjusting those.

Yochi Zakai - I think if WEAFF stays in place then we could set the discount percentages, assuming that the minimums and the caps are there. That's one approach, and that was kind of the approach that PSE took and what I was thinking as the default, but just because it's the default doesn't mean it's the best idea. So, if we decide to go down that road, I'm open to talking about other ways to do it as well.

Tillis, Daniel - Anybody else have any thoughts, Shannon? You work very closely with WEAFF and OLIBA both and the EDP now, what are your thoughts on whether we leave WEAFF in place and implement a bill discount rate, or if we should continue going down the path of making both changes at once.

Steed, Shannon - I think that if we make changes, those should be made at once and that would help prevent customer confusion as well as agency staff confusion. My primary concern is that the program still remain as accessible as possible to everyone, both customers and users.

Yochi Zakai - We haven't heard from any CAAs and I'd love to hear what you all think. I'm open to both approaches.

Lorena Shah – I know my preference, but this is a direction that I'm really supportive of. I like this direction because I think it will really help bring down the energy burden of some of our higher users so we're not wholly reliant on LIHEAP, and as Misty pointed out, there's a group of people that won't get LIHEAP, so I'm very supportive of this and appreciate the companies willingness to consider. And it's nice to hear that this is something similar to what's already being implemented down in Oregon. So, we're not way off base here with doing something totally different.

Tillis, Daniel – Lorena, if I can clarify, when you say you're supportive of this approach, which approach are you talking about?

Lorena Shah - Keeping WEAFF, having a discount plus be considered in the overall energy burden reduction.

Tillis, Daniel - OK, thank you.

Misty Velasquez Community Action of Skagit- I am totally on the same page as Lorena. I feel that there's a huge population of people that don't qualify for LIHEAP and to get their energy burden lower, they're going to need another program to fall back on, besides the discount program.

Tillis, Daniel - I think just for clarification, regardless of which direction we go, a customer will have the opportunity to get assistance for arrearages, which is what we've done in part today, and qualify for the bill discount rate program. So, if we stick with WEAFF then they get help with arrearages and potentially a credit on their bill in the same way they do today, plus potentially qualify for the bill discount rate program, just the tier would be the only variant there. But if we move to an arrearage management program, same thing, there would be an AMP in place to help with arrearage, they wouldn't have a credit on the account opportunity and then they could also qualify for a bill discount rate program. So, unless I'm missing something, that's how I see that the two options working, it looks like Lorena and Misty both have input.

Lorena Shah - So just to be clear, are you saying that with the idea of keeping WEAFF you would not do an AMP? Because I think I was still under the impression there would be an amp to handle arrears and then the combination of WEAFF and bill discount rate would be the more forward components to bringing down the energy burden.

Tillis, Daniel -Yochi, keep me straight, if the way I recall our discussion from last week, the two options we were considering was keep WEAFF in place as it is today and implement a bill discount rate program or eliminate WEAFF and replace it with a traditional type AMP and implement a bill discount rate program at the same time.

Misty Velasquez Community Action of Skagit - So I was kind of going on the same line as Lorena there, but I also wanted to put an input in that basically if you go with the AMP, you're saying a person has to have an arrearage in order to get their burden down instead of at the beginning. I guess the way I'm looking at it is why a person has to be behind to keep their energy burden down instead of just being able to pay their bill. And yes, having a credit possibly from the WEAFF but an arrearage management program only helps the people who are in arrearages.

Tillis, Daniel - Correct. That is traditional AMP. Would a customer be required to have a past due balance to receive assistance through an AMP?

Misty Velasquez Community Action of Skagit - Those households who are struggling to pay their bill would be forced to go into arrearages to be able to keep their cost burden or energy burden down.

Tillis, Daniel - Well, they could still qualify for a bill discount rate on future bills. Just to clarify what we've done in Oregon, we kept OLIBA, which is the equivalent of WEA and implemented a bill discount rate program. We did not also implement an AMP.

Yochi Zakai - So to respond to Misty, I think it is possible that you could design a bill discount program with discounts that are high enough such that the bill discount on its own reduces average energy burden in each tier to, you know, somewhere between 2 and 3%. You have to feel comfortable with numbers on the discount closer to what we're seeing with the Avista and obviously we'd use the Cascade data. With that being said, to respond to Dan, I think that we could also include an arrearage management program. I think you could have a bill discount program and an arrearage management program and LIHEAP, the way I envision that would work is, you process all the other payments before you start the arrearage management program. Ideally WEA will wipe out arrearages and then if it doesn't the arrearage management program is designed to deal with whatever is left. I think you could have all of them.

Lorena Shah - If people are falling behind and then we're using their grants that were traditionally designed to help pay future costs like LIHEAP, I know there's an arrearage component to it right now. But setting that aside as we don't know the future of that, now they will get their LIHEAP, WEA pledge and any additional AMP that's needed, then we get them qualified for a bill discount. But let's say that bill discount caps out at 50%, they still can't pay the bill going forward because they can't pay 50% of what they owe. That is an uncomfortable energy burden for them. And so that's where I'm struggling a little, I know I've used this example, but it is a real example; there are certain households that just won't go into arrears, and they will be struggling to pay to keep up. And so, then the only thing available for those folks are making choices between heating and eating, all those are really hard choices that they won't see their energy burden removed. They'll see it reduced through the bill discount rate, but that's like the only thing that's available to them, if they're not running arrears. I'm struggling with clearing the arrears out, using LIHEAP and potentially WEA before an AMP. It feels like we're just setting them up to have to come back in and do that all over again in a year or whenever they can get in next for an appointment, and I don't know if that were the direction I would support going. I know we need to maximize LIHEAP and we're still contending with what that looks like.

Pfordte, Byron - You mentioned people who don't have arrearages, reducing their energy burden through a WEA type program. And, I'm a little confused, if they don't have an arrearage and we're still applying an energy discount, I mean beyond that I'm not sure what more we could do. And then I think when we initially pitched this AMP program, the thought was that the relief would come in one lump sum as opposed to paying down a certain percentage each month. And in my mind that kind of kills two birds with one stone. It reduces that energy burden and gets them back on track with one program.

Lorena Shah - But how does it reduce an energy burden other than through the bill discount rate going forward? We wipe out the arrearage and then we're reducing it to a certain degree with a bill discount rate. But right now, those bill discount rates are on the low side compared to other utility like Avista's approach. So, they still have quite an energy burden and nothing to really reduce it. We reduced the past energy burden, I guess, but we're not reducing a future energy burden, except for by the bill discount rate.

Tillis, Daniel - It goes back to where Yochi was saying with the bill discount percentages to account for reducing the energy burden without help from LIHEAP or WEAf adding to a credit on the account today. WEAf doesn't require a customer to be past due. They can be obviously and that's where, at least what I've seen, a lot of those come from is a customer gets past due and asks for help. But then you have those who are past due but then they can also create a credit on their account. I believe it's up to \$300.00 if I remember right. So that helps with the past due and helps offset future arrearages and therefore future balances and therefore energy burden. It might require some changes to WEAf, we already increased the amounts. There was a reason for that, but it might have to look at the total credits that are pledges that can be provided and look at whether it does still allow for a credit on the account beyond just removing the past due balance. And then I think it would be the combination of that plus the energy discount percentages that would reduce the energy burden to a level that we're comfortable with. And I guess with that input, since it was mentioned that PSE has taken the approach of leaving their existing assistance program in place and just implementing a new bill discount rate, How are they addressing the questions about not having an AMP, WEAf and the bill discount rate all in place at the same time, that that feels confusing to me; having three programs and then four when you add in LIHEAP, and then five, when you had in Winter Help. I can't imagine how it would feel to the customer or an agency, even managing other programs, not just Cascades programs. And I guess my thoughts would be if we want to keep WEAf, let's keep WEAf alone with the bill discount program and modify WEAf to be what we want it to be, or just eliminate. We can even get an AMP and adjust the bill discount percentages. However, we think we need to adjust them to get to the right energy burden percentage.

Pfordte, Byron - I would say that if we're going to make changes to WEAf, we might as well proceed with an AMPED program.

Lorena Shah - For me, I think if the company is comfortable with significantly raising the discount for certain income tiers I am comfortable with that approach along with an AMP because I think that will help especially our lowest income folks, it will drive down their energy burden, future focus, and has a mechanism for addressing the arrears. I am supportive of either direction if we're going with a simplified program. The current kind of assumptions we've been playing with as far as bill discount rates really, really need to go up.

Tillis, Daniel – Just to take a step back so we're all our understanding what the other utilities are doing is all the same. From what I understand PSE is implementing a bill discount rate program while keeping their current energy assistance program in place, which I think is a rate payer funded program similar to WEAf and not a traditional amp. And then Avista is eliminating their traditional rate payer non-AMP assistance program and implementing an AMP, a traditional AMP, while at the same time the new bill discount rate program. Is that correct?

Yochi Zakai - Yeah, that's my understanding. I would just add that Avista also has a hardship program that allows Community Action agencies to provide a grant based to income qualified customers and other hardships, so they have up to 350 or something like that. So, there's just this other catch all for customers that need additional help that might not otherwise get it under the design of existing programs. And that's something that we've asked PSE to consider implementing as well because we are concerned with kind of that hole with addressing arrearages in the proposal as it stands now. I think having that flexibility of letting the CAA define what's a hardship and then having an additional ratepayer funded program available is helpful. I need to think more about exactly everything that's going to go into Cascade's program, but sorry I should answer your question directly and everything you said is accurate. But Avista also has this extra hardship program that's ratepayer funded.

Charlee Thompson - Avista is the one with the very high BDR tiers and percentages.

Tillis, Daniel - And we do have our winter help program for Cascade customers that can be used for additional assistance as well. One of the things that we'll have to figure out through this process is how we want that utilized within whatever the new framework is, but it's actually company and customer funded through donations.

Yochi Zakai - Both Avista and PSE have that voluntary donation program as well.

Tillis, Daniel - As we've gone through this discussion, my current opinion is that I'm totally OK with either approach. We keep what we have in place with making some modifications to it while implementing a bill discount rate or eliminating WEAf and creating an AMP while also implementing the bill discount rate. I have a difficult time understanding the need for WEAf and AMP and a bill discount rate in place altogether. I would rather see where we need to increase our bill discount rate percentages to avoid that so that we only have either WEAf or an AMP and a bill discount rate to manage and not three different programs plus Winter Help plus LIHEAP. I'd rather go one direction or the other way and not both.

Yochi Zakai - Misty or anyone else at the CAA's do you have the additional thoughts? I'd love to make some space for any more of your perspectives.

Misty Velasquez Community Action of Skagit - I'm just trying to digest what everybody is saying, so I don't really have anything more than what I've already said. I do agree that if WEAf goes away, I would advocate for higher BDR rates to benefit the clients and drop their rate plus burden percent.

Vern Gurnard— Keep WEAf.

Misty Velasquez Community Action of Skagit - Don't get me wrong, I would love to keep the program as well. I think it is a benefit to all clients, including the right discount program is a benefit with both of them together.

Tillis, Daniel - When you say you want to keep WEAf, is that how it works today or do you think if we're implementing a bill discount rate program, we should make some changes to WEAf?

Misty Velasquez Community Action of Skagit - What kind of changes are you thinking that would need to be changed?

Tillis, Daniel - One example is that it allows up for a credit to be created on the account. So, whether the customer has arrearages or not, they can qualify and then have a credit on the account to help with future bills, which is the purpose of the bill discount rate, to help with future bills. And so, you have the two programs both addressing future charges, it seems like having just one program address future charges would be a little simpler.

Misty Velasquez Community Action of Skagit - It may be simpler, but I am on the end that sees the struggle from the clients who struggle just to pay their bill, even if their bill is discounted, they're going to struggle to pay that discounted price. If we could alleviate that struggle just a little bit more with a credit that lasts for however long, few months or four or five months, so that they don't have to pay a bill, I see that as a benefit to the customer.

Tillis, Daniel – An example would help - let's say we have a customer who has \$200.00 arrearages, and they qualify for a \$700.00 WEAF credit, and they get a \$700.00 WEAF pledge, which creates a \$500.00 credit on their account. Now if I give them a bill discount rate that is X percent, how do I calculate that?

Misty Velasquez Community Action of Skagit - So I guess my question is how? I mean if we're calculating the benefit now, we're calculating it off of usage, not off of how much the client is billed. Would it continue to be billed or done off usage, or would it be done off how much that client must pay? Because if it is based off what the client is paying versus what their usage is, their amount is going to be drastically less.

Tillis, Daniel - So first, I should not have used that example with a \$500.00 credit, cause that's not possible with WEAF, but so \$300 credit. Our goal as a company would be to have a new calculator that calculates both the bill discount rate and WEAF or AMP based on past due balance, not past usage because again, the bill discount rate will account for usage because it is going to be a X percent discount on the customer's current bill. So, I guess another way to say my concern related specifically to credits being created on the accounts, is that if you allow WEAF to continue as it is today and create a credit on the account, then you have to account for that in the bill discount rate somehow.

Yochi Zakai – I'm not able to come to a decision today and will take it back, so we can all think about it. But under the option where we don't continue WEAF, I was wondering if I could share my screen, I played with the calculator kind of as we were sitting here and discussing, and I want to make sure that folks understand the kind of extent of discounts. I feel like it would be necessary to get to where we have somewhere around 2.1 or whatever low twos for the lowest tier income customers, 1.9% energy burden using just the bill discount alone. You're looking at, something in the 90s for Tier 1, something in the 80s for Tier 2. The 60s for Tier 3 and the 50s and the 30s for Tier 4/5. I just wanted to clarify that if we go down the route that like the company is preferring and that the CAA's are pushing back on, I feel like we would need very high discount rates, something along these lines in order to feel comfortable with that.

Mickelson, Christopher - I'm looking at the proposal. There are two issues that concern me - one the program costs \$43 million a year and then essentially customers with FPL of 100% percent or less

are getting free utilities. After they get other assistance; it looks like the energy discount gets them to say 2% and then other assistance gets them to negative burdens. So, in essence free utilities. I mean, if that's what we're trying to do, why not just design a program that gives customers at, say, 100% FPL. It just gives him free utilities and not have to try and design it. EDP, LIHEAP, plus an AMP and everything else, just throwing that out there.

Ortiz, Noemi - But it seems that at one point or another it would come into not necessarily a conflict of interest, but to receive both benefits. I guess you could say if it's providing the same assistance and then receiving the same duplicating efforts, customers receiving the same, but caveat that you can get either WEAFF or the bill discount program if that's in the thought. Especially in an energy discount, one that Community Action levels, it's kind of one or the other, not necessarily both, because it would turn out to be essentially going to a 0, for utility is what it would be at a 0 cost.

Tillis, Daniel - The more I think about that, having an arrearage management program and just a bill discount rate program with the appropriate correct tiers is the better approach. And because I think an arrearage management program, in a lot of cases, is going to be a customer who has gotten behind and not asked for help, they've managed to keep up in the past, now they can't keep up. They've gotten behind and they finally need to ask for help and to get caught up, an arrearage management program helps them get to 0 and get caught up. And then at the same time they qualify for the bill discount rate program which is intended to reduce their energy burden going forward to something less, to an acceptable percentage less than 6% total for all utilities is the minimum threshold for that. And so, because of the way those would work together, to me, having an AMP that addresses arrearage will help you get back whole. And now I'm going to help you reduce your burden going forward to me is the better approach.

Yochi Zakai - I'd like to respond to Chris and say I think we could design it so that we maximize the federal benefit and that there needs to be a whole conversation about how to maximize the federal benefit with LIHEAP and I think one option that we could consider is, LIHEAP is applied to the full bill amount pre bill discount and kind of pays off the entire bill for a month or two or however long it lasts. And then after LIHEAP is exhausted, the bill discount applies to keep energy burden down. So that is potentially one way, not saying it's the only way, but it's one way to address that concern and to maximize federal funding.

Charlee Thompson - That's what Avista is proposing right now too. I think they're saying to safeguard their direct service funds, the discount should apply to the remaining bill amount after LIHEAP benefit has been exhausted. So that that makes sense to me, Yochi.

Mickelson, Christopher - Do you know if they're doing that through their billing system? Because I I'm just not sure how that would work within the billing system, and I'm not our billing system guru.

Charlee Thompson - I'm also unsure as a non-billing system guru.

Yochi Zakai - I think if you're interested in that, it would be great if you could reach out to them and see what they're thinking there, I'm not sure that they have all their billing system stuff figured out, but this was actually a point that I think they decided on a couple months ago. So, I wouldn't be surprised if they've put more thought into it. The other thing to note about maximizing federal funds through LIHEAP is that we would want to continue calculating LIHEAP, assuming there was no bill

discount, so you know if in year two of the program we have a customer come in who's been receiving the discount when we go in to calculate their LIHEAP usage, we would want to assume a bill as if there was no discount so that we would maximize federal funds. I haven't looked into this myself, but I think we even heard from one of the CAA's that that was kind of a program design and requirement for LIHEAP, which is something to keep in mind for the billing system folks as well.

Tillis, Daniel - Cascade really has no impact on the LIHEAP calculation. That's completely out of our control, other than receiving the LIHEAP pledges and applying them to customer accounts, we really don't do much with LIHEAP.

Misty Velasquez Community Action of Skagit - The thing on that though is with you creating the program with the right discount program, are you going to be able to give the organizations the amount prior to the discount in a history?

Tillis, Daniel – So is LIHEAP based on past bill amounts or is it based on usage?

Misty Velasquez Community Action of Skagit - Usage.

Tillis, Daniel - OK. We could still give you usage.

Misty Velasquez Community Action of Skagit (Guest) - It's the cost of usage, so we need the amount, not the kilowatt hours.

Tillis, Daniel – I believe the bill would still show the amount the customer would have been billed and then it'll apply the discount percentage and then the new amount due. I think I'd have to look at the bill just to make sure that's how it's working. But I feel like that's correct. So that data would still be available. Misty I'm 90% confident, but I can confirm. And LIHEAP does allow credit to be created on the account, so I think systematically, if you think about, let's say we approve a customer for a bill discount rate before they get LIHEAP assistance, and then they get LIHEAP assistance, we get the pledge and we apply it. If it takes the bill to zero, the next time they get billed, they'll get that discount on the current bill amount. But if they have a credit, they'll still get a discount on what they're being billed. But it just will take longer for them to use up that credit, right.

Misty Velasquez Community Action of Skagit - Yeah, that's the way I envisioned it. The client would pay nothing until the discount is applied. It would be taken off whatever the customer owed and taken off their LIHEAP benefit. They would get a zero bill like they do now.

Tillis, Daniel - We could find a customer bill in Oregon where they've received LIHEAP and maybe got into a credit balance and see how that's working. We could see how LIHEAP and the bill discount program are working together in general and in Oregon.

Misty Velasquez Community Action of Skagit – If WEAFF goes away and we're using the LIHEAP program like that, it's all of those people who don't qualify for LIHEAP and the people above 150% to the 80% AMI or whatever it is that we're 200% FPL or all of them, that that could benefit from that WEAFF program.

Yochi Zakai - Misty, I think you're trying to get at the same point and that is we want a program that reduces energy burden for customers based on income, regardless of if they qualify for LIHEAP or not.

Misty Velasquez Community Action of Skagit - Yes.

Yochi Zakai - We have some undocumented customers who are not going to be able to qualify for LIHEAP, and we still want to have a program that can reduce their burden and not assume that they would get assistance from LIHEAP.

Misty Velasquez Community Action of Skagit - Yes, thank you, Yochi.

Tillis, Daniel - I think that's fair. I believe we can achieve that with just either a WEAFF or AMP and BDR with one of those two, not both, because it's just about setting the percentages of the right level for the bill discount rate.

Yochi Zakai - And then figuring out the interaction with LIHEAP.

Tillis, Daniel - I agree. Cory, any thoughts on all of this? You've been rather quiet today.

Corey Dahl - I don't have immediate thoughts. I'm still trying to catch up from last week since I was out all of last week, so I'll take the time that I need to look at the materials, but based on the conversations we've had around maintaining, I generally do agree with the consensus.

Tillis, Daniel - So one of the things I've asked just chatting here a little bit with Shannon, maybe in Oregon find some bills where the customer has received LIHEAP and see the interaction between it and the bill discount rate program, we have in place there and OLIBA. That again is what we have in place in Oregon. The OLIBA program that we had in place was previously like WEAFF and then a bill discount rate and then nothing has changed with the LIHEAP or Winter Help. I haven't heard of any concerns with customers not getting enough assistance through those programs to reduce their energy burden. And in Oregon, OLIBA can't create a credit balance, because it actually can only cover up to 90% of the past due balance. That's actually one of the changes I think we made during the implementation of the bill discount rate program. As we shifted to percentage pledges by tier, which we haven't gotten to that yet this round of talks, but we shared what that might look like last year when we were talking about a temporary AMPED program or at some point during the year we talked about AMP.

Yochi Zakai - I think this has been a really good discussion, but it sounds like the discussion is coming close to running its course.

Tillis, Daniel - I would agree, and I don't think we have time really to pick up any other parts of the agenda at this point. I don't know that any of the other topics would even make sense right now, since we don't have our decision on which approach we want to take. Do we want to give everyone some time to think more about the options and come back to the next meeting to decide one way or the other? And I guess with that, do we want to start meeting weekly with this group.

Charlee Thompson - I could do weekly. I think that would make sense for the timeline that we're hoping to stay on.

Corey Dahl - I think that sounds like a reasonable plan, I can do weekly as well.

Lorena Shah - Would that just be adding like one more to our schedule keeping them all at the same time but one of those weeks during the month?

Tillis, Daniel - I think that's how it would work. Unless we want to try to double up, I think there might be the occasional time where it could work. Next week, we have the full advisory group meeting, so unless you wanted to have a small group meeting and the advisory group meeting that week, then yes, you'd basically be adding one a month which will hopefully be enough. That means the additional meeting this month, for example, would be on the 29th.

Lorena Shah - And then one on the 5th potentially?

Tillis, Daniel -Yes.

Lorena Shah - So we're meeting the 2nd, 3rd and 4th I think currently. 2nd and 4th for this meeting, third for the WEAf or something like that.

Tillis, Daniel - Yes, that looks correct as I glance through the calendar here.

Lorena Shah - I'm up for adding those additional Wednesdays at this time and probably could swing a couple before the main WEAf too, if it was just like the hour before. I don't think I can really schedule outside of this Wednesday time due to other stuff.

Tillis, Daniel – We could schedule an hour if we want to have some dialogue on this before the full advisory group meeting next week. If you all want to talk separately and send a group consensus on your position ahead of time, I think that would be good. We have a meeting internally on Friday to talk about this topic and we could also come to a consensus internally, in our opinion. I've shared my opinion a lot today, but that doesn't mean everybody else on the Cascade team agrees with me, but we could come to a consensus and put together our thoughts and send them out to the group as well. Everybody good with that?

Charlee Thompson - Yep, that sounds good.

Tillis, Daniel - Any other topics for today before we wrap up? No - thanks everyone. I thought it was a great discussion. Have a have a good evening.

March 28, 2023

Ms. Amanda Maxwell
Executive Director and Secretary
Washington Utilities & Transportation Commission
621 Woodland Square Loop SE
Lacey, WA 98503

Regarding: UG-210755 Compliance Filing to Commission Request for Updates to Advisory Group Pursuant to Order 09

Dear Ms. Maxwell:

In compliance with Paragraph No. 78 of Order 09 in Docket No. UG-210755, Cascade Natural Gas Corporation (“Cascade”) encloses for filing the minutes from its March 22, 2023, WEAFF Small Group Advisory meeting. The following documents are submitted electronically as part of this filing:

- UG-210755-WEAF-Agenda-03-28-2023.pdf

If you have any questions, please contact me at 208.377.6015 or Chris Mickelson at 509.734.4549.

Sincerely,

Lori Blattner

Lori Blattner
Director, Regulatory Affairs
Cascade Natural Gas Corporation
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Kennewick, WA 99336
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Attachment

WEAF Advisory Group

Agenda

March 22, 2023

KEY TOPICS: AMP/WEAF decision, bill discount rate tiers and qualification process.

GOALS FOR MEETING OUTCOME: Finalize decision on AMP/WEAF and possibly bill discount rate tiers.

1. Program Design Options (AMP or WEAF with BDR) – Yochi Zakai

Tillis, Daniel - Item 1, we're definitely going to get to and depending on how long it takes us to get to a decision on that topic, we may or may not have time for 2 and 3, and then 4 is just discussing what we're going to talk about next time, which we will definitely spend some time doing so. I mentioned that Yochi was listed for #1, and that's just a carryover from the last meeting that I didn't change. I think it's really going to, number ones more of a group discussion anyways, but I can kick us off with a refresher on the decision we need to make and essentially a decision on what the other programs for assistance will be for customers. The other utilities we've discussed so far, Avista and Puget Sound Energy are doing two different things, with Avista eliminating their traditional LIRAP Assistance Program and implementing an arrearage forgiveness/management program for customers to complement their bill discount rate program. Then Puget Sound Energy is keeping their traditional PSE help program to compliment the new bill discount rate program. The company's position originally and still continues to be, that as we implement the new bill discount rate program, we'd like to utilize that to help customers with future energy burden and provide a significant discount depending on FPL and AMI to reduce energy burden going forward once the customer is qualified and then eliminate WEAF and implement a new arrearage management program, or an arrearage forgiveness management program, to help with past energy burden for customers who have built up a past due balance. Thinking about how that might work, similar to Avista customers at 50% FPL or lower would likely qualify for arrearage forgiveness and only use the word "likely" because we haven't set those tiers yet, and then above 51% to 200% would qualify for an arrearage management program where over the course of time maybe 12 months they would receive a set percentage of arrearage forgiveness each month, if they make a payment of past due and current charges each month, and then at the end of that period the balance would be eliminated. The other option the company has considered initially, would give arrearage forgiveness to those customers up front at a certain percentage level to eliminate somewhere between 40 and 100% of the arrearage. For those customers above 51% probably, 40% and 75% or something like that, and pay the rest of the past due balance at that point. There's been some conversation and potentially support for keeping or implementing a new arrearage forgiveness or management plan and keeping some portion of WEAF. The other part of the company's recommendation is that we utilize Winter Help, which is the company and customer donation fund, which currently sits at over \$100,000 in that fund, to help bridge any hardship or crisis situations for our customers. Just to be clear, the company's recommendation is a new bill discount rate program with tiers set at the appropriate levels that this group agrees on, an arrearage forgiveness program for customers at the

lowest income tiers and an arrearage management program at the threshold of where forgiveness stops up to 200% FPL, and then Winter Help to use as a supplemental fund to help when all those other options are exhausted. I think I'll just leave it right there and just open it up for anyone who wants to provide feedback on the company's recommendation. Any new recommendations that have been discussed since our last meeting 2 weeks ago? While I'm waiting to see if anybody jumps in, I'll just share that if we choose to go with the company's recommendation or some version of it utilizing Winter Help, we will work with this group to help recreate or revise the current guidelines for that fund to make sure it's doing what we want it to do.

Yochi Zakai - What? No one's responding? I guess I'll start. I just want to acknowledge what we heard last time from some of the agencies is that they had a preference towards keeping the WEAFF program. As I mentioned, I think that I could be comfortable going with the kind of Avista program design where we don't keep the WEAFF program as we're able to have sufficiently high rates, that without LIHEAP or other assistance, we're bringing energy burden down to the agreed upon level, whatever that is 3% or 2% energy burden. With the AMP that gives immediate forgiveness to the lowest income customers, but for others would have a 12-month payoff period. Then when it comes to the Winter Help program, I have a little bit of concern about relying on a voluntary program, but I think it should stay within that first period. Let me say this clearly, I think this also comes back to a conversation we had over e-mail about dealing with the overlap with LIHEAP. If we are not assuming that LIHEAP is available when we're setting the discount rate and the arrearage management plan, then I'm comfortable not adding a different program and keeping Winter Help. But the corollary to that is I want to make sure that we are designing the program such that we're not replacing federal dollars with ratepayer dollars, in turn would entail the Avista approach that that I sent out. I think you responded with some concerns Dan of applying the LIHEAP benefit before the bill discount such that we're not substituting what was formerly served by federal dollars with ratepayer dollars. That's my overall impression and thank you for the opportunity to respond.

Tillis, Daniel - Thanks Yochi. I'll take the last part first and that's the LIHEAP interaction with the other assistance funds, I definitely confirmed that's not what we're doing. As I shared with that example from Oregon with the bill discount rate program, we have had actually quite a few discussions with Avista about how they're doing that since you shared that e-mail and they seem to have found a way to automate it, but and I passed that on to our CIS IT team and we actually have a meeting Friday on that as well as how we can make an AMP work that spreads out over 12 months with the customer commitment and company forgiveness each month. So, that's the two big topics in that meeting. Both of those would be a lot of work for us, but we might have to start manual with some of that and then automate it. Anyways, I definitely like letting those LIHEAP funds exhaust on the account before any other assistance is applied, so I think we all agree with that. As far as the bill discount rate and Winter Help and LIHEAP, it's a lot and so I think if we decided to keep some part of WEAFF, I have a hard time figuring out where Winter Help fits in. If you have a bill discount rate to help with future energy burden, you have an average forgiveness/management plan to help with past burden, and then you have WEAFF to somehow address any other possible scenarios, then I just don't see where Winter Help is all that useful anymore. In fact, I think it's a little underutilized right now based on the amount of money that's building up in the fund, so as we sit here today with LIHEAP and WEAFF in place and nothing else, I think it seems like Winter Help is a little underutilized in both states because it is for both Washington and Oregon. I guess if we decided to keep WEAFF,

then I'd I would question whether we should continue to solicit donations for Winter Help. If we decide to eliminate WEAF, then I definitely think we want to keep Winter Help. We did learn that Avista's donation fund is a shared fuel fund, so it's shared by all the utilities who participate in Washington, where ours is just Cascade alone. There aren't any other companies who share in that with us.

Yochi Zakai - Good to know. I'm really glad that you're exploring ways that you can both have an AMP that spread things out over 12 months and figure out how to apply the LIHEAP amount before the bill discount. I think those would be to great improvements for the entire customer base. Thanks for doing the work to figure that out.

Charlee Thompson - I don't really have anything new to add, but for the sake of adding a voice to those thoughts and maybe towards a consensus, I just wanted to say that I agree with Yochi's statements, I would also be comfortable with a program that has LIHEAP and AMP and BDR interplay with each other. And I'm very happy to hear that Cascade is looking into the automation that this program is capable of using with LIHEAP as well as the AMP. I really like Avista's design. It came out of a lot of discussion and research supported by advocates and CAP Agencies in that discussion. And I know this is a different group of advocates and CAP Agencies, but I think it would be an improvement and one that we can strive towards here. So that's all. Thanks.

Tillis, Daniel - Thank you, Charlee. Any additional thoughts beyond what Yochi and Charlee have shared on this topic?

Lorena Shah - I just wanted to say that I'm also feeling really good about the AMP and this LIHEAP piece, because that is really important, and I feel really comfortable with a robust discount rate if we get a robust discount rate and doing away with WEAF. I think as long as we can agree on the bill discount rate tiers that get us to that energy burden level that we want to see, this feels like it's moving in a good direction.

Tillis, Daniel - OK. Thanks, Lorena. So maybe to try to move along here, can we say we have a tentative agreement to implement a bill discount rate program with agreed upon discount levels after discussion with this group? And while we implement that bill discount rate program, we'll eliminate WEAF as it exists today and implement a new arrearage forgiveness and arrearage management plan program similar to Avista. Maybe not exactly the same, but similar to Avista, we like it a lot, so I think it will end up being very close. And utilize Winter Help to help in crisis hardship situations where customers are about to be disconnected and they meet criteria to get that help because they don't qualify for other help, or they've already received that, or something like that. We'll partner to build out what that Winter Help crisis hardship program looks like.

Corey Dahl (PCU-he/him) - That sounds reasonable to me, Dan.

Charlee Thompson - Yeah, I think that sounds good.

2. Bill discount rate tiers (if appropriate based on item 2 decision) – Chris Mickelson

Tillis, Daniel - Any objections at all? No- awesome. Chris, I think we have time to jump into #2. I know you've been doing some work on what tiers and discount rates. I agree Charlee – we will show what the tiers and discount rates might look like for the bill discount rate program and in various scenarios.

Mickelson, Christopher - First, before I share, did anyone have questions on the FPL, FPL AMI crossover equation explanation? This has kind of been one of those items that have lingered over the last few weeks. I want to make sure we take care of any questions there first.

Corey Dahl (PCU-he/him) - I don't have any. The explainer that you sent was really helpful.

Mickelson, Christopher - Alright.

Yochi Zakai - I want to echo that. I found it very helpful, thank you.

Charlee Thompson - Agreed. Thank you.

Mickelson, Christopher - Based off what Dan laid out and as he indicated, we've looked very closely at what Avista did based on their tiers, even very similar in discount levels and on their arrears forgiveness or arrearage management type programs and so this is what we're proposing for the tiers, the discount levels and then the same for the AMP, energy burden. We're kind of using two terminologies. They both mean the same. The discount gets customers down to 3 1/2% or lower energy burden before or after the discount but before WEAFF, but with LIHEAP a lot of those customers go to essentially 0 or even a negative energy burden. At a 12% enrollment, this keeps the program just below \$3.3 million, which keeps it slightly under a 5% for that first year or just above 3% on that first year. Any questions on the last model I sent? I think Lorena asked if she could have the first tier stay, but other tiers move around. I made it so the model could do that. So, do these tiers and discount levels for the energy discount program seem appropriate? This basically aligns with Avista. This accomplishes the goal on energy burden basis while also trying to keep overall program costs down.

Yochi Zakai - Thanks Chris. I really like this framework and how we're approaching it, so thank you for sharing and putting it together. My question again is not an objection, but just one of understanding, it looks like you're targeting 3 1/2% energy burden for most of the customers, and then a 3% energy burden for those in the in the highest income tier, can you talk a little bit about the thinking that went into choosing those targets?

Mickelson, Christopher - Sure. So based off the energy burden before a discount tier, I wouldn't really give Tier 5 much of a discount, but it sounds like everybody wanted something in there and something greater than probably 1% would have been required, because that's what my minimum was. So, the way I looked at it is, the overall goal of the Senate bill was 6% energy burden figuring gas is somewhere between 1 and 3, and no more than 1/2 of that energy burden since that energy burden is both electric and gas. If we say we're one third, that means we would have to get it inverse. So, we'd have to go from 6% down to 4% and if we're half, then we have to take it to 3%. And so, I kind of split the middle and said, 3 1/2, that's in between the four and the 3% energy burden that Cascade's trying to get these customers down to and then obviously the electric will have to do the other half of that energy burden.

Yochi Zakai - Those numbers where gas is typically a third or 1/2 of the energy burden, where did those numbers come from?

Mickelson, Christopher - That was back in the initial LINA report. The low-income assessment report we had showing that; of that 6% energy burden, what makes up the majority of that electric? And then it was gas and propane and other fuel sources, so, correct.

Yochi Zakai - Great. So, remind me of the date, that was recent right within the past couple years?

Mickelson, Christopher - Yeah, that was probably this time last year.

Yochi Zakai - OK, great, thank you.

Tillis, Daniel - As I look at the percentages, I might want some rounding that could help with some of that as well. Obviously, we're not going to do these decimals of .3, .6, .7. But we might want to consider rounding Tier 1 down to 95 Tier 2 down to 70 Tier 3 we can decide down to 40 maybe and then I don't know what it does to the rest of them, but these seem like pretty reasonable discount levels for each tier.

Yochi Zakai - I agree. Well, we'll have to figure out the specifics and if we want round numbers or exactly how to design that. There is one thing that came up in **PSCM**, kind of our earlier discussions here where we were talking about adding a minimum benefit amount trying to help customers who are asking for help and making it worthwhile for them to come in if they are approaching us and saying they need help. We would provide some kind of minimum amount and, if I recall correctly, we increased the minimum amount to \$125 and now we have the average discount amount in the top tier being kind of lower than that. So that's one thing that I think is making me pause a bit as I want to think about what level of discount can we be providing to the customers in that top tier such that we are making it worth their while to come in. But obviously having it be a lower amount because those customers are on average, less burdened and then I think we will see customers approach us that are either in the more burdened half of that or the more burdened customers within that higher incomes here or that have other circumstances that have really driven them to need help. That's kind of a thought that makes me think a \$65 average discount might not be an incentive, might not make it worth it. So anyway, the one thought that I had.

Mickelson, Christopher - Well, it's more than just the energy discount. They would also be getting arrears management and so that combined benefit is around \$245.00. By the way, this discount is only looking at the average strictly on the energy discount, but that average discount is on all bills, the overall benefit that a Tier 5 customer is getting is close to \$250.

Yochi Zakai - Assuming they have arrears.

Tillis, Daniel - Correct. If they have a past due balance, then the total would be close to \$250 if they don't and they qualify going forward for the energy discount for a bill discount rate then it would be closer to that \$65 level on average. I think the good part about having five tiers. You get to distinguish between the income levels a little bit more, the negative of that is at that the top tier, you get to a much lower percentage discount because of what that income level is and the energy burden is as Chris mentioned, if we treat it the same way at 3 1/2% after the discount, then it

wouldn't even be that high. So in Oregon, for example, we have just 4 tiers and the discount percentage doesn't quite get that low.

Mickelson, Christopher - Any other thoughts?

Yochi Zakai - Can you share this proposal, Chris? I know we could probably go in and put those specific amounts there, but if you wouldn't mind emailing it out, I think that would be good.

Mickelson, Christopher- Yes, I'll send it out after this meeting.

Yochi Zakai - Again, I think generally I like the direction we're going. I think we're just going to have to think about what kind of tweaks we might want to make but I generally like the direction this is going.

Mickelson, Christopher - Alright, sounds good. By the way, kind of going slightly off topic, but wanted to give an update from our last meeting, granted probably not all these agencies are on there, but this is the breakdown of the agencies and the funds they'll get for the CBO. I believe Shannon or Dan will be working with those agencies to work on getting funds out to everyone. It looks like we got 5 participating. Woohoo.

Tillis, Daniel - I think we decided last week that we'll change the next full Advisory Group meeting out for a small group meeting, I think was the 19th. We'll work out the details during that meeting and then then we'll get the funds out.

Mickelson, Christopher - And the reporting required.

Tillis, Daniel - Correct. So, if I'm hearing you right, you want to spend some time with this updated spreadsheet. Anyone else have any initial questions here or thoughts before we wrap up this discussion and try to spend some time on the qualification process, at least open up that conversation.

Corey Dahl (PCU-he/him)- My initial reaction is I think it's definitely headed in the right direction, and I appreciate Cascade's willingness to go with the recommendation that we had. I think we're headed in the right direction, and we can set all the details.

Tillis, Daniel - All right, so this will be our primary topic for the next small group meeting next week. Hopefully, we can get the tiers in the discount levels all finalized by then. That'll be some great progress to get us to that July 1 filing date or approximate. The next topic on the agenda is the bill discount qualification process and I fully recognize we probably won't make any big decisions on that today. But I think since we have plenty of time, it's worth having some discussion about how the current qualification process works in Oregon and then we can discuss any information that you feel is relevant for the qualification processes that you're aware of, for a Avista or Puget Sound Energy. And that can drive some conversation and dialogue. I've mentioned in the past meetings, that as of October 1 of last year we implemented our bill discount rate program, EDP, in Oregon and at the same time we made some changes to OLIBA, kind of the WEAf equivalent there. Our goal was to eliminate OLIBA and get to an AMP in Oregon as well, but just the time crunch didn't allow us to do that last year. One of the key changes was it became possible for Cascade employees to qualify customers directly for OLIBA and the bill discount rate program. We also changed the OLIBA calculator to the tiered arrearage management percentages that Chris shared earlier. This would be

relevant in that with the way it works right now with OLIBA is that customers in the four tiers, for their past due balance, they get a certain amount of forgiveness right up front for that past due balance, up to 95% for the lowest of the four tiers. There's no commitment after that from the customer, they just get whatever that forgiveness is and then they need to pay the rest either immediately or enter into a pay plan or time payment arrangement, and then Winter Help is available to bridge certain gaps. For example, customers reconnecting after a disconnect for non-pay, there's an upfront amount due to allow for that reconnect. If they only qualify through OLIBA for a certain amount of coverage, then Winter Help can be used to cover that gap if the customer doesn't have that to pay at the time. Agencies and the company qualify customers for OLIBA and the bill discount rate program in Oregon; we use the same calculator, we have the same process and then the agencies use the assist portal to provide us anything that they qualify the customer for. I currently envision it working for Washington somewhat similar in that Cascade employees would be able to qualify customers for the arrearage forgiveness/management program, the bill discount rate program at the same time, hopefully the same calculator, and then utilize Winter Help for any crisis, hardship issues or bridge any gaps, and then the agencies would be able to do the same.

Yochi Zakai - I think it's reasonable to have the company enroll folks but the important thing there is just making sure that we have the referral process from when a customer is enrolled by the company to the CAAs so that they can hopefully get them in for LIHEAP and weatherization and all the other programs that they offer. As long as we're able to have that strong referral process where all of that information is passed along, including all the data fields that we discussed, and we have a mechanism to get that to the Community Action Agencies, and have metrics where we're tracking how many customers are enrolled by the company that actually make it to the Community Action Agencies and how many don't because I think that's going to be important to track, to see how successful we are. I think if we have those two then we're comfortable with moving forward with the company and rolling customers.

Tillis, Daniel - OK, thanks. I would add that our goal would be to have a calculator similar to what the new WEA calculator is, that provides both the AMP forgiveness amount and energy discount amount at the same time without having to use multiple calculators. Just plug in the key inputs and then it would generate the percent discount and arrearage plan, or plan to address the arrearage at the same time for both the company employees and the agencies. Any other thoughts on the qualification process itself?

Yochi Zakai - I guess my other thought of that is that we will also want to work with the company on a script, but your call center folks probably aren't using, to ask some of the questions that are on there. I think we'd want to coordinate to make sure that you can chat with the Community Action Agencies who have experience asking those questions, even if they are voluntary and figuring out a way to provide training so that everybody who is asking them can do so in a way that is more likely to elicit responses. The situation I want to avoid is that the company's call center folks say this isn't required, so don't bother. But this is valuable information and so some discussion around that as well I think would be helpful once we're at the implementation phase.

Tillis, Daniel - Yeah, I totally agree. I appreciate the offer to partner on developing scripting or verbiage for our team members to use to really enter in the conversations with customers who are in a difficult situation and are seeking help potentially, or we're proactively offering the help and

then also gathering the other data outside of just the qualification. I think that will be really important. With that also some verbiage at the end on the best way to transition into a referral to the agencies, so we'll be able to share the value that that will bring if they contact the agency after that referral, that will be helpful. We'll get into a lot more details on the qualification process after we figure out the discount levels and the arrearage forgiveness/management levels. There's a lot of work to be done there, but I think we have a general framework for how we want it to work.

Yochi Zakai - I would just add, I think we've kind of figured this out, at least in terms of the details of income calculation with Avista and PSE and so we might not want to get into that today but I think we could kind of provide an overview of where we landed there and see if that might be a good launching point for how we would do it here. I'm sorry, I'm in so many of these discussions I'm forgetting exactly where we've gotten into detail and where we haven't. But I would just say generally we're looking to keep it consistent with LIHEAP so that the calculation only has to be done once.

Tillis, Daniel - And with that, are you suggesting that you want the calculation to be usage based instead of bill amount based, because LIHEAP uses usage.

Yochi Zakai - Sorry, I should be more specific. The calculation of income to be consistent with the way that LIHEAP calculates income.

Tillis, Daniel - OK, great. I think sharing more on how the other utilities are going about the calculation would be good to have. I did talk to Avista briefly last week, but mostly through the e-mail conversations, they've shared a lot of their documentation. Some of which includes their calculator so we have some insight into that and can start getting some of that from PSE as well.

Yochi Zakai - Yeah, I think what we did with PSE was figuring out when you were looking at income kind of having check boxes for the different types of income. And so that way when a customer is providing their income, you can say, do you have this income, was it included, do you have this type of income, was it included and that way we're making sure that their self-attestation is a little bit more accurate and then when the customer ends up with the CAA, they will have access to those checkboxes and know the types of income that I'm likely going to need to discuss what this customer, I'm ready to hit those first and make the conversation faster.

Lorena Shah - I think also PSE's looking at bucketing those income types depending on whether they're an earned income from a job which gets a deduction or a fixed income. A fixed income where some are taxed, and some are not. So, we've been discussing, it's kind of four fields with various ways to bucket income together or in addition to the check boxes, I think we haven't quite settled on exactly what those buckets are. But looking at around 4, you would have your earned income that would take a 20% deduction, then some sort of taxed unemployment taxed, potentially, though, we thought about maybe just ditching that all together and then your fixed incomes like SSA that don't change for the year. But we haven't landed exactly on those buckets yet, the goal is to keep it aligned with the LIHEAP calculation of income.

Tillis, Daniel - That's all good to know from Yochi and Lorena because we definitely don't do it that way in Oregon today. We have a very basic process that's utilized so if we go in that direction, it'll be a very different process in Washington.

Lorena Shah - Does Oregon collect it as gross income or net income, or how do they ask for it?

Tillis, Daniel - We ask for the gross income.

Lorena Shah - OK. I'm not necessarily opposed to simplifying it. I kind of like the idea of trying two different approaches, but I was curious about gross versus net.

Tillis, Daniel - Maybe for the next meeting, if we have time after we talk through the tiers and discount levels, we can get a view of how you do that for LIHEAP and what it's looking like for PSE so far to give us some idea of how it would work.

Charlee Thompson - I think that makes sense. Avista decided on gross income with deductions in alignment with LIHEAP and then as the Lorena was pointing out PSE, still discussing this, but it sounds like they're on board with at least gross income and I think are worth though discussing the deductions and alignment with LIHEAP, component of it.

3. Bill discount qualification process (if time permits) – Dan Tillis

Tillis, Daniel - OK, so moving to our last agenda topic, and if anybody has anything on the other topics that we need to talk about again, we certainly can, if we've moved on too fast here. But, looking at the agenda and thinking we've got general agreement on number one now. So, I think two and three would be our primary topics with two being for sure the primary and then three if we have time and more of the discussion on how Avista and PSE are collecting income and how we might want to do that part of the qualification process. That seems like a good idea of topics for the next meeting. Any others, any different topics you'd rather have? Obviously, we have to have this one because that's an important next step.

Corey Dahl (PCU-he/him) - Yeah, I think those topics that are teed up look good to me in terms of future topics, since I don't think that we would be able to handle more than those two topics in one meeting. But in terms of the income verification, I think that Avista has a good model to run from in terms of the basic process that's been set up there, we can look at some of the details and what might work better for Cascade's situation and what the agencies think is reasonable in terms of the percentage of applicants through self-attestation or percentage of applicants that are verified. We can look at that, but just queuing that up for a future conversation and something for consideration.

Yochi Zakai - Yeah, thanks Corey. That was actually what I was going to suggest too. I don't think we need to put it on the calendar next time, but that seems like the other kind of big topic that would be good to address. And if you want, I actually just pulled up Avista's slides where they went over their verification process, if we have the time. If you think it would be productive, I'd be happy to put those up and we could at least ground ourselves in what that process looks like and think about if that might work for Cascade or if we're going to want to make any modifications. But I like using that as a template to build from.

Tillis, Daniel - Yeah, I think that'd be a great use of time.

Yochi Zakai - So this was Avista's presentation to their full advisory group, kind of summarizing what their committee has agreed upon to date. This is their verification program, they decided to use a

random selection from the previous month's enrollment, so they are not looking at a probability model. They decided to go with 6% of the total enrollment pool and then they also decided that those who have already been verified or everybody who enrolled, and they want to make sure and their choosing randomly 6% of those. And then if some of those 6% already had their income verified, for example, because they already requested LIHEAP or participated in weatherization or something like that, then they wouldn't have to actually do anything. But their number was called and have already been verified, so that's fine. And I would note that 6% seems to be at the high end of where discussions are with others, so I don't think we've settled on a percentage for PSE, but I think in looking around and where the discussion was, I think it was around 3%. So, the next one, the agencies were going to be looking to get the verification done within 90 days and they essentially decided that they would tell customers that it was a 90-day timeline, but termination from the program actually wouldn't occur until 120 days. So, there would be a little bit of lag for customers who were late coming in or who are coming in right at the deadline and then they also had a provision that customers that were terminated for nonresponse but then came in within 90 days and actually submitted their documentation would get back credits assuming that they were enrolled for the entire time. Should I keep going or any questions at this point?

Charlee Thompson - Avista did note that they're not going to use the word terminated or termination when talking to customers.

Yochi Zakai - Yeah, all that terminology is going to have to be carefully, carefully selected. Charlie can, can you take this?

Charlee Thompson - When you have customers that have been selected, they have the 90-day window to go to an agency and provide proof of income for verification. There's going to be some of them that don't respond. Those who don't respond can come back after their 90 day of response period had ended and if they do that within, I think it's another 90 days they can be provided that back credit to whatever amount of months that they missed. And then this provision is saying that also for those nonresponse customers. CAP agencies who have information in their system from enrollment and other programs or however they might be able to verify customers if there are capabilities they can do take the initiative to go try to verify customers income to be able to proactively keep them in the program, even though they didn't respond kind of as a safeguard or a backstop. And then Avista, there's the second dash line there. Avista, we still have to talk about this, but we're also discussing how to keep medically fragile customers enrolled for longer, or if there's a different process that we can use for them to keep them even if they don't respond. If we could keep them enrolled in the program to continue their benefits, so that was still at the point to talk about.

Yochi Zakai - The next two are pretty self-explanatory that the verification should be in the customer's preferred contact method. The letters address why the customer was terminated. I think that's pretty self-explanatory. Either they're over income or they just didn't respond and they're still eligible. And then Avista decided to do a two-year enrollment term and they said that if a customer's income is verified, this might be whatever 90 days, 100 days, whatever after they originally enrolled that the two year term would reset once they provided their income.

Charlee Thompson – It looks like there's six touch points. Communication touch points between the utility or the utility and agency will together contact the customer six times. 3 letters and three other notices in preferred form of communication that the customer specified text or call or e-mail.

Sylvia Schaeffer - I agree Yochi, that is a lot, especially when we have 10 other funds, programs that we're running. That's a lot of communication to try to track somebody down but I mean, that wouldn't be something we could do just to be fair to my staff and the amount of work that we're doing already.

Charlee Thompson - That makes sense, and I'm sure that could be adjusted for different utilities. Two of those communications that you can kind of see on Yochi's screen that there's just one letter from the utility, you've been randomly selected. It's just that first notification, the last one is a letter from the utility again, the final notice; this amount of time has passed, and you're being removed from the program, here's why and here's what you can do about it. And if you get reenrolled here are the back benefits that you can get for what you missed, so it's four notifications or four reminders, talk to your local agency, here is the contact information.

Corey Dahl (PCU-he/him) - Yeah, I'll just jump in here. Definitely more steeped in the Avista conversation than I am, but I had I filled in for one of my team members yesterday at Avista's Advisory Group. What they've agreed to is quite a few contacts and we can certainly discuss what works best in in Cascade's case here, but a couple of things to note that might reduce the lack of a better term, sticker shock of that number of communications, is that it's obviously not going to be for all customers who enroll through self-attestation, so it's going to be a percentage of that who are verified, so that obviously reduces that workload a bit. But there's another provision within the verification process that Avista has agreed to that they are going to be taking, I believe they've agreed to 6% verification, so 6% in the month after someone has self-attested will be to verify the income, so it's just that subset of customers within the month after they've applied through self-attestation and within those customers and, apologies if this is not making sense, I'm trying to walk through it the best I can through the steps, but within that 6% of those randomly selected if a customer has already verified their income through an appointment with the agency. If they've applied for other benefits, they're good to go, so there doesn't have to be any additional contact. So those are just some things to think about. I'm not saying that it's not going to result in that much more work for the agencies, but just filling in some more details that might provide a bit more perspective on what workload might look like to make those contacts.

Sylvia Schaeffer - If I can say also that I think that we try to get our customers or clients and it either Cascade or specific powers, customers applications done within two days. So I mean we work as fast as we can to make sure that the clients are getting their benefits in a timely manner. So I think when this happens, I think we'll still keep that same focus to get these applications done as quickly as we can and not the 3%, 90 days or whatever, that just piles up work for us, so we try to be a little bit more efficient in getting these things processed and we'll have the same focus as we do with our other programs with this.

Tillis, Daniel - Thanks for reviewing that, it was all really helpful, coincidentally Ana from Avista did share a few of these slides with us just this morning. In fact, in response to questions we've been asking and it's really very timely for our work in Oregon and trying to finalize our post qualification verification process there and what we're going to be doing for Washington. When I reviewed the

information this morning from Ana, I was pleased to see they're doing it monthly. That's our most recent recommendation in Oregon. There was some discussion about waiting longer to start the verification process and I think we all know customers lives can change very quickly. And if you wait 90-120 or longer days then you're not really verifying what they told you when they initially qualified, in my opinion. So, I think we were very supportive of monthly selection of customers to be verified on post qualification, my initial thoughts are 90 days feels like a long time to try to go through the verification process. Not saying I wouldn't support that, it's just that my initial response is it feels like a long time. And then the 6%; we have talked about 3% in Oregon and on some of our discussions here. I've started thinking maybe 3% feels a little low, but the 6% includes customers who have already verified through other means. I think we were intending for our 3% to just be those customers who qualify through self-attestation. There is a difference there. I guess you could do it either way and probably get to a similar percentage and I think we'd prefer to figure out a way to just pick a percentage of those who only qualified or qualified only through self-attestation and not through some other means. And then if we found that they had qualified through some other means, we could check them off as being verified. I think we're open to the different approaches that we could take there, and I think we've already agreed the agencies will do the post qualification verification, and certainly Sylvia, I hear you on the workload. That's part of why 90 days feels like a long time because you're still trying to verify each month, that workload's going to pile up, right? Unless you get people to respond and it's going to become cumulative over that period and not end as soon as you might like, you attempt to contact the customer and verify them to send in the information, so they have to balance that between giving the customer enough time to respond. So those are my initial thoughts.

Sylvia Schaeffer - I absolutely agree. With that, we would never deny anybody help. We will wait the 90 days if that's what it takes. But if we can get them done sooner, then that's what we'll do.

Corey Dahl (PCU-he/him) - Yeah, just reacting to that, I think that definitely makes sense. We want to make the process as efficient as possible for everyone, and that includes the company, the agency and the customers, but just clarifying a couple things you had mentioned, Dan; my understanding and Charlee correct me if this is not correct, how the 6% with Avista works is that they would be pulling from self-attested customers, but if in the time between the self-attestation and when customers are selected for verification, they have since provided income verification to the agency for example, then those customers would be pulled out. So, it's not necessarily that the customers come to the agency right away and they didn't do self-attestation or some other means of qualification instead. It's providing an off ramp for the agencies and the customers who have already provided income documentation after self-attestation, so it's not a duplicative process. Is that right, Charlee?

Charlee Thompson - Yeah, I think so. I think you asked a question that was kind of getting at this to Avista yesterday at their energy Assistance Division Group meeting and I know PUC is having the discussion of should we have a more formal communication or outreach to customers? That's kind of saying we're self-attesting, but if you provide income right now you won't even be put in the pool for selection for verification, that's what PSE's discussing, and Avista hasn't quite discussed that point. But I do think that if someone comes in and gets verified for another program or something like that, and that gets passed along through the agency and into this BDR program then they would also be removed from that 6% if they were selected. So short answered, yes, that makes sense.

Corey Dahl (PCU-he/him) - OK, good. I'm glad that I understood it. And I think something to keep in mind, just generally speaking is that I'm running under the assumption that we're not going to get all the details right in this first go round, so it's an iterative process. And if 6% or whatever details we're talking about, the number of contacts is too much, if 90 days is too much, we'll figure that out and agencies will probably have a really good sense of what percentage of customers respond to requests, how quickly they respond, and what type of communication they respond best to. If it's communication from the company or from the agency, that's stuff we're all going to learn, and we can certainly adjust our approach to this based on that learning to make sure that it's successful and recognize that the ultimate goal of this is to keep customers in the program.

Lorena Shah - Yeah, I totally agree with what Corey was just saying there about this being iterative and we're going to learn a lot. But I personally do like the 90 days. I assume this 90 days sequentially starts when that first utility letter goes out and then lands in the mailbox. Then we're going to pick it up. We're going to try three times or whatever we land on. I feel like Avista is pretty reasonable, because those three contacts are emails and text message or a call depending on what that client's preference is, we're going to probably do that in over a two or three-week period. Then we'll kind of let it sit for a minute, go back with that final letter around the month and 1/2 mark and then that's it if they don't respond. So, I do feel like it seems reasonable. The 90 days seems like a good place to start from. And then we learn what we learn like Cory said, and of go from there. I think functionally, two of them, the utility is handling. So really, we're just doing our best effort to try to reach out to the clients a few times based on their method of contact and then that final response letter from the agency, it doesn't feel a whole lot different from what we might be doing already to try to like to get somebody who we've got appended file with right now and don't want to deny him. Going back to Sylvia's point, we're probably going to want to do as much of this on the front end as we can, and we definitely don't want to deny anybody that we don't have to. So I just I think for me Avista's approach to the time frame and the number of contacts seems reasonable functionally even if it seems a little heavy on paper. I don't have a good sense of the percentage and what that means for the agency, so don't really have an opinion on that right now, it'll be reasonable whenever we choose.

Tillis, Daniel - Has Avista provided any insight on how the agencies will advise Avista that you've been able to verify the customers income or not. Is that going to be through their work bench, I think they call it.

Charlee Thompson - I think I also forget what it's called, Dan, but it is like a shared portal that the agencies and Avista has access to so I assume that's where their communications and data sharing would happen.

Yochi Zakai - PSE also has a portal that they maintain. It seems like there needs to be an effective and secure way for customer information to be passed, between the agencies and the company in whatever format because the customer lists and demographic information are going to have to be provided to the agencies when the company has collected it. I think they're providing every week and then there's going to have to be information obviously that comes back the other way.

Tillis, Daniel - We can start exploring our timeline on our portal to get something set up or figure out what our other options might be.

Yochi Zakai - As we're talking about enrollment, I would like to consider this because this is going to be a self-attestation program and because everybody that's getting assistance now is providing documentations of income. I think it would be great if we could go back within a certain defined period, whether that be a year or two and just take everybody who got assistance and had their income verified as a part of that process and have them enrolled as the program starts automatically. Kind of a batch enrollment to start out.

Tillis, Daniel – Definitely, that's what we did in Oregon. We went back 12 months and anybody who had qualified for any energy assistance at all, if we had their FPL or SMI in Oregon, then we qualified them at the appropriate tier. If we didn't because they just qualified for LIHEAP and we didn't get that information, then we qualified them at the top tier and then sent them a letter advising that we had done that and that they can contact the company if they feel like they might qualify for a different discount level. Just yesterday we received a final data sharing agreement with Housing and Community Services organization who handles LIHEAP in Oregon, where they will provide us, every month, file for customers who qualify for LIHEAP with their household size and income, and we'll be able to use that to enroll those customers in the appropriate tier based on their income level and their FPL or SMI in Oregon; whereas today, if they only qualify for LIHEAP, we auto enroll the customer anyways. But again, it's only at that top tier of 15%, not the appropriate level based on their income. So we want to set up a process similar to that in Washington wherever the right source of that data is, if it's the agency sending us something every month for anyone they qualify for LIHEAP, or if it's the Department of Commerce or wherever that might be, we definitely like to get that income and household size data from somewhere so that we can qualify those customers for the appropriate discount percentage.

Lorena Shah - So in that sense, Dan, you're thinking it would simply be a list with just a few fields, not really a separate sort of application that you'd be looking for us to fill out for BDR applications.

Tillis, Daniel - Correct. Maybe once we get the Oregon report, which we should get our first one soon, we could potentially just use a similar report with those fields or maybe something that can be submitted just through the portal. We can figure out the best way to do that, but it's important data, so that also saves us time on the back end if the customer calls back end to requalify. It's best for the customer to get into the right tier up front, but we definitely will do that auto enrollment right at the very beginning, on or about October 1st, where we auto enroll those customers without them having to apply for the bill discount rate.

Yochi Zakai - I wonder if over the summer that you might be able to work with the CAAs to get the people enrolled in LIHEAP which you don't have income data for if the CAA might be able to get that to you so we could have a more accurate count, a more accurate tier placement for those customers as well, because we know they'll be at least 150% FPL, so they can definitely go in that tier because they are LIHEAP. But they could qualify for an even higher discount.

Tillis, Daniel - Yeah, that's a good idea.

Yochi Zakai - I didn't run that by the agencies though.

Lorena Shah - I'll speak on behalf of my agency; I think it'd be just fine. The vast majority get WEAF anyway, so you're going to have that information on the AMI tier level or the FPL, whatever it is, the

one that we send along so I don't think that would be a problem to do at all. I did want to loop back to what I was just asking previously about sort of the perhaps a lack of application that the agencies would fill out for a BDR app, but I think there's some of those voluntary fields that we want to make sure we're capturing from both from our agencies. If we are originating the BDR application and like we've talked about that the utility would collect as well, like those the race and demographic data. So, we want to make sure we're both collecting and reporting that so that there is an aggregate somewhere, within CNG to then analyze that data as needed because if we're only sending real basic LIHEAP data, then you'll be missing all of our demographic data in order to analyze the program.

Tillis, Daniel - Yeah, that's a good point too.

Lorena Shah - If we can get away with not having an application, I do like that so we can keep it simple, but we do applications all the time too if that makes it easier.

4. Set key topic(s) for next meeting – Dan Tillis

Tillis, Daniel - I think we would definitely rather avoid you all having to duplicate any of your efforts. And so maybe if there's a way for you all to download what you put in your system once you have an application that we can work with that somehow. We're coming up against time here. I will say I've edited the agenda for next week a little bit just to add the post qualification verification process if time permits. If we have an hour and a half in these meetings, if we get to a point in the first couple of topics where we can't talk anymore, I think it's valuable to utilize the time. I will send the agenda out in the next day or two. Right now, I have bill discount tiers and rate or percent discount, the qualification process, including how we collect income; that being the primary focus, and then the post qualification verification process. Does that agenda work for everybody for next week?

Corey Dahl (PCU-he/him) - That sounds good.

Tillis, Daniel - OK, I see a few nodding heads and a thumbs up. Alright, very good. Got all three methods of affirmation. That's always great. Anything else before we wrap up for the day?

Yochi Zakai - Thanks so much. Really productive meeting.

Tillis, Daniel - Great. Thanks everyone. Have a great rest of your day.

April 11, 2023

Ms. Amanda Maxwell
Executive Director and Secretary
Washington Utilities & Transportation Commission
621 Woodland Square Loop SE
Lacey, WA 98503

Regarding: UG-210755 Compliance Filing to Commission Request for Updates to Advisory Group Pursuant to Order 09

Dear Ms. Maxwell:

In compliance with Paragraph No. 78 of Order 09 in Docket No. UG-210755, Cascade Natural Gas Corporation (“Cascade”) encloses for filing the minutes from its March 29, 2023, WEA Small Group Advisory meeting. Additionally, Cascade encloses for filing the minutes from its April 05, 2023, WEA Small Group Advisory meeting. The following documents are submitted electronically as part of this filing:

- UG-210755-03-29-2023-WEAF-Agenda-04-11-2023.pdf
- UG-210755-04-05-2023-WEAF-Agenda-04-11-2023.pdf

If you have any questions, please contact me at 208.377.6015 or Chris Mickelson at 509.734.4549.

Sincerely,

Lori Blattner

Lori Blattner
Director, Regulatory Affairs
Cascade Natural Gas Corporation
8113 W. Grandridge Blvd.
Kennewick, WA 99336
Lori.blattner@intgas.com

Attachment

WEAF Advisory Group

Agenda

March 29, 2023

KEY TOPICS: Bill discount rate tiers and discount percentages, income collection as part of qualification process, post-qualification verification process

GOALS FOR MEETING OUTCOME: Finalize bill discount rate tiers and discount percentages, potentially finalize income collection approach as part of qualification process.

1. Bill discount rate tiers and discount percentages – Chris Mickelson
2. Income collection as part of Bill discount qualification process (if time permits) – CAAs
3. Post-Qualification Verification process (if time permits) – Dan Tillis
4. Set key topic(s) for next meeting – Dan Tillis

Lorena Shah

While we are starting the recording, this is Lorena. I just wanted to say caveat that some of the other agencies have not seen this yet unless they had a chance to look at the e-mail. This was work that Yochi and I did earlier this morning.

Tillis, Daniel

Lorena - Do you want to walk us through the recommendations to share those with everyone and then we can talk about from there?

Lorena Shah

Sure. We are proposing to move tier one, which is currently at the income guideline up to 5% of FPL, to 0 to 20% of FPL. We had a similar conversation with PSE, and we moved tier one up to 20% as well. Mostly because this is just functional 0 income. Sort of the nuance between 5% and 20% of FPL is rather negligible, so we wanted to propose to move that up to 20. We are happy with the actual discount rate though for that tier, and then we are proposing to move the actual discount on Tier 5, which is our highest income lowest discount tier, moving that just up a little from 7% to 10%. And this really has to do with the optics of it, feeling like a significant enough discount for folks to make it worth their while to apply for it especially for those that are seeking assistance that are higher income. The first thing we would like to just see is rounding discounts up to the whole percentage just for easier messaging.

Mickelson, Christopher

Alright, thank you for that. So, I'll first start with going from 5% to 20%. Part of the reason Cascade proposed the 5% was to align more with Avista where we have probably more service territories. Bumping up next to Avista more than we do with PSE, which is one service area, so that's kind of the rationale why we went with 5 instead of our original proposal of 25. But if everybody wants to go with 20, that's fine. But while now we may be in alignment in one service territory that bumps up against with PSE, we won't have that alignment with Avista who is at 5% for their first tier, and we have more service territories that are closer to them, so something to consider there. The second; rounding the discounts, that's fine however, the first-tier discount will have to go down because right now it puts them below a 1% energy burden. As for the perception of 10% going to from 7 to 10, the reason we gave 7 is really this group, at least on an energy discount, before they get anything, is already below the other threshold where we were shooting in between 3 and 4% for all the tiers, so 3 1/2 is kind of where we were putting it, they're already below that before we even apply the discount. By going into this they would be getting that or arrearage management and that's still a hefty sum of a grant. Something to maybe reconsider there. Any thoughts to those aspects? I'm just giving you the reasons of why we originally proposed what we did.

Charlee Thompson

I did have a thought on expanding Tier 1 from 5% to 20%. You said that it was Cascade's reasoning that more of your service territory align with Avista, which has that 0 to 5% for the first tier versus PSE which has the zero to 20%. I personally like the expanded 20% for Yochi and Lorena's reasoning. Of course, that is still effectively 0 income, but if it helps alleviate Cascade's concern, or at least speaks to your reasoning, I anticipate that stakeholders involved in Avista's BDR program, at least for year two, as I think their tiers have been set, will probably try to change that in the future and try to increase their tier to 20% or at least higher than what it is. I would say we can try to get Avista in alignment with Cascade in year 2.

Mickelson, Christopher

I have no problem setting it at 20 and then running the analysis again, that puts that discount, once rounding everything, at 8, and I would push back on going to 10% on that 5th Tier, they're still getting the arrearage management and the discount, which will put them well below the energy burden threshold of 6%. Maybe we'll take a step back, it sounds like we're good with this type of tier breaking point levels to 20 for Tier 1, then 21 up to 50 for Tier 2, 51 to 100 for Tier 3, 101 to 150 Tier 4, 151 to 200 for Tier 5 - are we good with that?

Roberts, Andrew (UTC)

I don't see the e-mail from I'm assuming Yochi, with the proposal. My question is what's the difference between a 5% FPL and 20% FPL?

Mickelson, Christopher

What do you mean? What's the difference?

Roberts, Andrew (UTC)

What's the income at 5% FPL and what's the income at 20% FPL?

Mickelson, Christopher

It will vary based off the counties.

Corey Dahl I'll just jump in while Chris is doing some calculations here, I think the most important point to think about in terms of 5% versus 20% FPL is that though the dollar amounts are obviously going to be different at all household sizes, it's still functionally zero. The amount of income a person earns at 20% is pretty small and even in comparison to 5%, so that's the way I'm thinking about it.

Mickelson, Christopher

Yes it should be fairly small. I do agree with that. So, let's take an annual income of \$1100, which is 5%. Something tells me 5% will be under \$1000, so you're talking somewhere between 50 to \$100 a month. And then let's just say roughly it's somewhere between 400 to 450 a month at a 25%.

Roberts, Andrew (UTC)

Yeah, that's pretty low. You mentioned bringing it up to 20 would change that Tier 1 benefit level. Any idea what that would look like?

Mickelson, Christopher

It would be 88% of the bill.

Roberts, Andrew (UTC)

OK. And what is it currently or what is it at say 5 percentage?

Mickelson, Christopher

A 5%, we did 97%.

Roberts, Andrew (UTC)

OK. I think that takes care of my questions. Thank you.

Mickelson, Christopher

It looks like we agree – woohoo, we're getting there. I don't see any problem with the rounding. I think even Dan mentioned that last time we talked about rounding the discount to the whole percent. The last issue is Tier 5. Is it 8% or is it 10? I could see going to 8 and it still keeps this in a nice energy burden range. But I can't really see the point of going to 10, other than we're just increasing the program costs and that's another aspect I've been trying to consider in design. This is keeping this overall program burden that all other customers will be paying at trying to keep that as low as possible. Any thoughts?

Tillis, Daniel

I guess the thought I have on the Tier 5 percentages, is it more important to have a percentage discount for that tier that reduces the energy burden to a more favorable level than reducing the energy burden for the other tiers? Or, is it more important to have a percentage that is more motivating for those customers who fall into that income level; to motivate them to contact us or the agencies to try to qualify for the discount. I think my position is we should set it at the most appropriate level and treat those customers as similar and as fairly as other customers in the other tiers. And you know if it's enough to motivate them to contact us, great. And if it's not worth their time, then that's their decision to make.

Charlee Thompson

I've been silent here because I don't actually have a very strong opinion either way on 8% or 10% here. I

can see both and I understand the reasoning or the push for both. So, for what that's worth and also to break the silence but curious if others have strong opinions. Thanks.

Mickelson, Christopher

And by the way, because of the AMP for this set of customers, they're still going to get a substantial arrearage forgiveness which is comparable to what they get with WEAf, so if these customers are still reaching out within these income percentages now, I don't see why they would not, considering they're going to get similar to what they get in WEAf plus an additional discount. So, I don't think we're really losing the incentive.

Corey Dahl

In terms of the 8% discount versus 10% discount for Tier 5, I'm in a similar position as Charlee, I would accept a 10% discount, but looking at the effective energy burden the difference between those is pretty small. But obviously curious to hear what Misty and Lorena think about that if they have an opinion.

Lorena Shah

Misty, where are you? Just because I already kind of stated our position as you know the reason, we proposed the 10% was just to make it more attractive and to have it be more substantial for somebody to apply for. And I also completely hear Cascade's side of it this, personally speaking, I'm more concerned about the raising the income tier to 20% and as far as what we're just talking about here, I think TEP can live with 8%.

Misty Velasquez Community Action of Skagit

Lorena, I'm here and I would probably agree with you on all of that. I just know we have a hard time now getting people in at that top level tier and Cascade wants us to do a lot of outreaches to get these people in here. But I could live with either.

Charlee Thompson

I had a question that maybe we haven't discussed this in this group. Do we know if we plan to advertise the percent discounts to customers?

Tillis, Daniel

I'm trying to think about what we've been doing; I don't actually think we put the percent discounts in any of our outreach material. I think we maybe have said at some point you could qualify for discount up to a certain percentage at the highest percentage, but I'm reasonably confident that we haven't actually advertised the discount levels to customers.

Charlee Thompson

OK. And I'm not saying do one way or the other, but I guess I was thinking about that because 8% to 10% is not that much different, but we're worried about 8% not sounding as good as 10%, if we don't advertise it, that might lighten or lessen, for what that's worth.

Tillis, Daniel

Right it's a really good point. If you're a customer who's in that income bracket and you're interested in assistance if you saw it at 8%, you probably would be like, well, maybe not worth my time. But if you don't know what that number is, then you might at least ask about it. And since you're on the phone with somebody, move forward with the application process. Great point.

Corey Dahl

I do see the point about making it sound more attractive because even just me thinking about it and this is obviously anecdotal, but for whatever reason 10 does sound significantly more than 8% in my head when I think of a discount, even though it's functionally not that much bigger. And in terms of budget impact, the difference doesn't seem like it would be a deal breaker. That said, regardless of where we land on this 8 versus 10%, but particularly if we land on 8% moving forward, I think it's really important, from public counsel's perspective, that we take steps to maximize the amount of federal dollars that are being leveraged in addition to the discount to make sure that customers that do get a robust tier, would not be eligible for LIHEAP. I guess that's a bit of a moot point here. But additionally, beyond that, the way that the arrearage management program piece of this is structured will definitely factor into all of this and how all the pieces of the puzzle fit together.

Mickelson, Christopher

Keep in mind I would recommend these discounts, maybe for this initial couple of program years and then once we actually get real customers in the tiers, how their bills are, where they are able to stay on the system without ever getting into any type of disconnect type scenario, then we could always come back and reevaluate were the discounts at the right levels and readjust accordingly.

Tillis, Daniel

Could we get agreement today on the discount percentages that are listed on the spreadsheet right now, or discounts to start with and evaluate the program just like we will evaluate every other component of the program once we have it in place and make adjustments as needed?

Corey Dahl

Public Council can live with 8%, but I will say again that our general support of the proposal that goes before the Commission, we will take a holistic look at all aspects of the proposal, it's contingent upon that, if that makes sense, not wholly contingent, but we'll take a detailed look at it, but also consider it on a holistic level in terms of overall program impact, so that's the way I'm thinking about it.

Tillis, Daniel

OK, that's fair. Chris, can you just plug 10% back in there again? I didn't see the after-energy burden change. Is there reason it didn't change?

Mickelson, Christopher

It did. It's a fraction of decimal points. What really changes is your overall program costs. I think it adds, say, \$100,000 based off this level, but if we ever get up to say 100% enrollment, you're talking over \$1,000,000.

Tillis, Daniel

OK. I guess the other part of this is since we are talking ratepayer funds here, since we already have that income bracket, that tier down to 3% energy burden after receiving the discount, it's already lower than the other tiers, is that really a good use of ratepayer funds to just make it more appealing or worth the effort for customers in that income bracket? The same reason I said earlier, should we utilize those ratepayer funds elsewhere?

Charlee Thompson

I think NWEA is fine with the tiers presented right now. I agree with Cory that we'll look at the holistic picture and will continue to assess the program for changes in year two and future years.

Mickelson, Christopher

To your point and Cory's, you folks said this holistic approach - what exactly do you mean by that? One thing I did want to bring up is talking about getting these types of points ironed out so we could actually get a filing to the Commission, sooner than later. I'm thinking more like by the end of April, if possible so the Commission can act on it by June 1st, but then give our billing system folks a lot more leeway and time to get things in place for the start of the program year versus July 1st and the Commission having it for 30 days and the effective date of August 1st. Those extra few months will be very beneficial, since it sounds like a lot of the programming behind the scenes will take quite a bit of time, especially in the use of federal dollars before ratepayer dollars.

Corey Dahl I understand where you're coming from here with these thoughts. Mentioning a holistic approach doesn't envision extending this process at all It's just a matter of working through all of these important details, but ultimately our hope is to have a mutually agreed upon goal, something we can all be proud of and support before the Commission. Ultimately, our recommendation to the Commission, coming from public counsel's perspective, is really dependent upon all pieces of the program and up at this point, based on what we've worked out, the program looks good, but we still have some big details to work out. We're going to be looking at it from a total perspective in terms, not only in terms of how the discount shake out related to income tiers related to discount amounts, but also how we include federal dollars for those eligible. Also, how we incorporate the AMP and how we work through processes such as income verification.

Charlee Thompson

Corey captured what I was thinking of very well. Essentially, I was also thinking what that terminology holistic was, what are we doing with the tiers and the dollars with LIHEAP and AMP and all those design elements. But I was also thinking, as Corey just mentioned, beyond the tiers, what are the other program design elements? I first went to verification and what to do with customers that don't respond to our request for verification and if those details. The detail here wouldn't stop me from supporting this program.

Mickelson, Christopher

The way I've been kind of looking at this is there are certain things that need to be in the tariff and talked about and then there's other aspects that aren't really part of the actual tariff and is more kind of the behind the scenes. The way information is shared, what customer information is collected, all those kinds of things are not in the tariff and more behind the scenes and agreement between the company and agencies, the things in the tariff are the discount tiers, the AMP, forgiveness levels and then also the audit process would be one of those things in the tariff. So, I mean if we can do those things first so we could get a filing put together I think it would be very valuable. But if those behind the scenes are part of that overall package you folks are thinking about, then maybe we do have to wait until July 1st, which based off our CC& B folks have indicated it can take anywhere from 6-9 months. If that's the case, then there will be a lot of automation, or a lot of manual processes before we can ever get some automation in place and some additional headaches for Dan's group.

Tillis, Daniel

I know we've been having the discussions with our CC&B IT team on both using LIHEAP funds before ratepayer funds and an AMP that spreads the remaining arrearage forgiveness or the arrearage management amounts across 12 months and both are heavy lifts, especially for the LIHEAP funds being used first. We have the same core system as Avista, but they can be very different based on how they've been set up and the modifications that have been made so we can't do everything the same way. Realistically probably 6 to 9 months for some of those changes is what we're being told. What that does mean is the earlier we can file and get approval and agree on some of the key functionality of the program, then the sooner we can have automation in place. It doesn't mean we can't start October 1, we would just likely be starting with more manual processes than we would like to have, it would be nice if we could file sooner than July 1 if at all possible. It sounds like we have agreement from everyone unless someone wants to raise their hand or provide a different opinion. At this point, I think we have agreement on the tiers and the percent discounts that are listed here. I think Yochi said he was going to miss at least the first hour. Maybe if he joins us late, we could just revisit the 8 versus 10% or the tiers that are in there now since it's a little different than what he sent in. If not Lorena, can check in with Yochi and share what we've discussed and give us feedback via e-mail before next week? That would be great, but tentatively, I'd say we have agreement and then we can move on and learn. I saw couple thumbs up. So good news. I think we can move on to the next topic which is the income collection as part of the bill discount and AMP qualification process. But since we're not really talking AMP just yet, we'll go with bill discount. Maybe someone from one of the agencies can walk us through your process for collecting income during the qualification process today, maybe both for LIHEAP and when you have a WEAFF applicant and the types of income you're collecting, how you're separating that and treating it differently, those kinds of things.

Misty Velasquez Community Action of Skagit
Are you looking at how we document our income?

Tillis, Daniel

No. Last week we had a pretty good discussion about how we are going to collect income to qualify customers for AMP and the bill discount and there's some discussion about maybe how Puget Sound's going to do it. There was some discussion about how we're doing it today in Oregon, and I think we talked about continuing that discussion today with more detail on how the agencies are collecting income.

Misty Velasquez Community Action of Skagit

I guess I could say here we set up an appointment with our client and they bring in their income documentation. We tell them at the time they schedule their appointment, what income documentation we need and then they bring that to us, at that time we then calculate their benefit. It gets pretty in depth of what income documentation we need from them.

Tillis, Daniel

Misty - how do you collect the types of income?

Misty Velasquez Community Action of Skagit

When we're on the phone with them, we go through all the different types of income that we count as income. So, our application that we have to schedule an appointment is like our pre application, we get a lot of the information that we need ahead of time to complete the file other than the document the

client brings to us. We ask them do you get Social Security; do you get child support; we go through all of the different income types with them when we're scheduling that appointment.

Tillis, Daniel

OK. And somehow you enter that into the application?

Misty Velasquez Community Action of Skagit

We have an intake form that we fill out. So, we have all of their information at the time of the appointment, and we can just go off of what we get from the client over the phone screening and then go from there at the time of the appointment for collecting their documentation and completing the files.

Tillis, Daniel

OK. And based on the income type, you treat some of those differently, like regular earned income you discount?

Misty Velasquez Community Action of Skagit

So earned income we give a 20% discount, if they have a retirement income like a pension and it's taxed, we take a 10% discount off of their pension as long as taxes are being taken out of it. If they get unemployment and they're unemployment is taxed, they get a 10% discount taken off of that income. I think if they're getting FMLA, they get a 20% discount off of that because that's treated just like earnings.

Tillis, Daniel

That's exactly what we wanted to dive into a little bit more. It came up in our last meeting and it will help determine how far into the detail we want to get in, in the income collection process. But in Oregon today, we basically just ask the customer what your current gross monthly income is, and that's what we plug into the calculator too, along with household size and arrearage. Since the calculator gives both the discount percentage and OLIBA amount that they will receive. The pledge they'll receive is to help with their past due balance and we plug that into the calculator. We don't go into the detail of different types of income and discounting. So, the question is, do we want to try to use more of the agency approach that you're using today, or do we want to utilize what we're doing in Oregon? And that's both the company and the agencies in Oregon who followed that process.

Misty Velasquez Community Action of Skagit

Right now the way we do our scheduling, if a client calls us and schedules over the phone, we go through that whole process with them. The whole paper process that I just described to you. But if they go online, currently we're doing our scheduling through Puget Sound Energy on their scheduling tool, they just put in their total gross income, how many people live in their home and they schedule their appointment where they come into our office, at which point we then have to spend more time with the client than originally. We give an hour for the appointment, and it usually takes a lot longer for clients who schedule online because we don't have all of that information up front. If we are doing auditing and we don't have that information up front, it's going to take a lot longer for us to determine what that client's actual income is and talking to that client a little bit longer, so it's going to take longer on the agency part is what I'm trying to get at there.

Tillis, Daniel

I think we're going to need to link the upfront income collection process for the company to the audit process for the agency. And if we decide to take the Oregon approach and only collect monthly gross income, without all the details of how the customer gets that monthly gross income, then that's what we would expect the agency to verify is just that total gross amount. But if we decide to take a more detailed approach and get income by type and discount certain types and things like that then we would collect that up front and then pass that on to the agencies for you to use in your verification process.

Misty Velasquez Community Action of Skagit

I understand, if you folks are only collecting the total gross and there's no stating where that total gross is coming from, it's going to take the agencies a lot longer to determine where that income is coming from because the clients don't always put in their amount. It's sounding like you want us to. So, for LIHEAP, we go through a BVS system with a state which tells us specific like they have earnings, they have unearned income which could be Social Security, child support, all of that. But a lot of families don't consider child support as income. And so, they don't report that off the top when they're reporting their income. They look at solely their income as being just work, they don't look at other income in the household income. It would be a lot easier if there were check boxes for the clients to be able to say this is where our income comes from.

Tillis, Daniel

That makes sense, and that's one of the things we talked about last week and I can't remember if someone said PSE is taking that approach where they might go through a list and ask what your monthly income is, and then of your monthly income is some of it child support, some of it SSI or some of it this type, and if so, how much. I don't think right now we have a hard position on the best approach and that's what we're really wanting to try to figure out.

Lorena Shah

Is the plan when somebody is applying through the utility that there will be an online application?

Tillis, Daniel

We have an online application for Oregon right now. We don't collect income. We currently ask them if they know their FPL or SMI level. We're considering changing that to income. We haven't yet because conversations we've had in this meeting about securing the data we're going to collect, our IT team is not happy with, they're also not happy with what we're already collecting and in the way it is being transmitted. So, we've been reluctant to change FPL SMI entry to income because it's a little bit more customer specific when it's income, you'd have to have the household size to back into the income but for the individual, when they submit that online application. We're working on getting that data behind a more secure method and once we do, we would want to collect income on that initial online application from the customer. That's part of why we need to make this decision too, we need to get that work done if we're going to just collect gross monthly income that's pretty easy to add. If we're going to have customers selecting check boxes and putting in amounts for each type and data like that, it's a little bit more work.

Lorena Shah

That makes sense. We haven't quite figured out exactly what the buckets are for the handful of fields we will have, but my assumption is that you would put in your earnings from your job on one line, it would then calculate 20% off those gross earnings behind the scenes. There would be a box for fixed income

that's not taxed, fixed income that is taxed, self-employment and maybe other cash. I think four and five buckets of income that may have a calculation on the back end that it's doing in order to like to calculate it. And then we were talking about after deductions, we calculate your income as X and then that puts you into discounts. But these are generally the income sources that we're working with, and LIHEAP and what the corresponding deductions are. I put that in the chat.

Misty Velasquez Community Action of Skagit

I would say that my preference would be to at least let them put in their gross income and then check box what income they're counting and their household as part of their income, so we have at least something to go off of when we are trying to verify income.

Tillis, Daniel

Not necessarily get the amount for each type, but get the gross and then the types that they are considering and the gross - is that what you're saying?

Misty Velasquez Community Action of Skagit

Yes, that is what I'm saying. How Lorena is saying PSE is doing it, I am all for that. But if we are trying to go for less, I'd advocate for doing a gross with a check box of income so that we have something to go off of so we're not going blind when we call a client and say verify the amount of money and where it comes from.

Tillis, Daniel

That makes sense.

Sylvia Schaeffer

I agree with Misty

Corey Dahl I also agree with Misty on this, but I still have to agree with Misty in terms of what the minimum of information needed is but have a preference to collect more detailed information. And as far as some of the concerns that some of the folks that Cascade who are helping to build out these systems and would build the systems around how the data is collected and stored, it would be viable to connect them with PSE. See how they are going about it, I'm sure it's through their portal, so that's probably a third party, but it may be a useful exercise.

Tillis, Daniel

Thanks, Cory. We can definitely connect with PSE to find out how they are going to collect and store the data, we've had some initial conversations with them on their programs. I did have a meeting with our IT and cybersecurity teams on Monday morning to talk about the collection of the income data and then all the other data we have talked about in this forum, and we think we have a solution. The good news is we need to get it in place for Oregon anyway, so we do not need to wait to get that process started. I would anticipate we will be good with that by the time October 1 rolls around and we implement the new programs in Washington, and I don't expect a delay on that beyond that date. The sooner we can lay out how we want to collect the data, less risk we will have and not being able to collect what we want as far as building out the form itself. So, what I am hearing right now is at a minimum that gross monthly income and then the types of income that make up that total, and then potentially asking the customer to provide the amounts for each of those sub income types. To me that actually feels easier on the website than in the conversations with the CSRs. I am a little concerned that the customer tells us

they make \$1000 a month and then we ask for the amounts of the subtypes, they add up to 1400. Then, we have to say, which one is right and then go back and reduce and those are not conversations our team's accustomed to and could really put us in a position of some staffing concerns if the calls are taking too long, so just something to think about there. Lorena, as I look at that table you put in the chat, I think one of the things we will need from the agencies as we start to outline for our team is the training and process to collect this data is maybe some more descriptions around what each of those income types are. Again, our team members are not accustomed to discussing income with customers at all other than in Oregon. When we ask them for their gross monthly income, we do not get into any details about the types of income they receive and so I would really want our team members to have a good understanding of what each income type is in case they ask that question. And the customer says, I do not know what that is, can you tell me. If you all have something, some resource you could provide that would give that the more detail or description or definition of those income types that would be really helpful. I am sure there are sources out there we could go find it, but if you have something handy, it would be helpful and save us some time. Anything else on the topic of how we collect income, what we collect? We have a good framework right now of the minimum and we'll consider also trying to get the sub amounts for each of those types if it works out.

Misty Velasquez Community Action of Skagit

When we do our phone intakes it takes our Screener about 10 to 15 minutes per phone call to do that.

Tillis, Daniel

We're anticipating these to be longer calls than normal and we know we're going to have to consider that in our staffing needs, the other part of the challenge is that mid-September through mid-November is actually our busiest time of the year because it's getting colder obviously, and some customers turn their gas off in the summer, especially if they use it for heat only, then call us in the early fall, typically, depends on the temperatures, to turn it back on and so we're extremely busy especially through the month of October, and that's not just Cascade it's for other brands as well. It is just all the things we have to consider as part of this is, we don't want those customers wanting to turn their service back on or customers calling to get help or for any other reason to have to wait too long. We have worked really hard to get our answer time and service level back to a really good place and we want to keep it there, so we want our team to be as efficient as possible through all of our processes, including this one. The third topic we had on the list was post qualification verification process if time permits. Do we want to get into that today in our last twenty-five or so minutes that we have scheduled, or just talk about our key topics for next week. Obviously, we agreed in the past that the agencies will conduct that for us, and I think a big part of this is tied to the discussion we just had, and Misty did an excellent job of stating this, the agencies are going to need info based on our intake process at the company. We are talking about 6%, in Oregon, we've been talking about 3%, I think I mentioned in the last meeting that I'm starting to think maybe that's a little too low. We could talk about that today, if anybody has a strong opinion on that 6% number, I did not ask Ana how they picked that, I should have, I was thinking maybe 5% to have a rounder number but we're open to whatever volume the agencies think they could handle. We also talked about the 90-day window after the verification process starts and the agencies made some really good points on why that might be a reasonable time frame to start with. We have not had this discussion internally at the company yet. My position would be I am pretty comfortable with a lot of this this framework and don't have any major objections to launch what they're doing right now but would want to talk about the percentage a little bit more to land on the number. I am comfortable with

the 90 days to start with random sample of the self-attested population. Does anybody have any opinions on any of that or any other parts of the verification process you want to talk about today?

Lorena Shah

Does CNG have a breakdown of what 3-6% would look like for each agency's area? That really helped us when we were looking at it with PSE last week. I hoping we are going to land somewhere in the five to six range with them but wasn't sure if you have that data available to share with us.

Tillis, Daniel

We do not, but I bet my friend Chris could put something together for us with some estimates.

Lorena Shah

I think that would be really helpful for us.

Mickelson, Christopher

So based off Oregon, and we have been kind of averaging between 80 and say 100 customers a month and that was with an initial enrollment target of around 30%. Obviously, Washington service territory is a little bit bigger. Historical look assistance recipients over the last 12 years and auto enroll those customers, and if we know their discount levels or energy income percentage will place them in the correct tier. Otherwise, we will default them to the lowest tier until they reach out to readjust and for those customers, we wouldn't audit them since they've in all likelihood, they've already gone through the agencies to receive assistance, whether that's LIHEAP or whatever else.

Tillis, Daniel

If you just took the Oregon data and you know, even doubled it, even though we don't quite have twice the residential customers in Washington as we do in Oregon, but it's close. Overall, especially with twelve agencies in Washington versus just five in in Oregon with whom we work in, just add on to that for point of clarification, in Oregon, we have just started the process where we get, for LIHEAP qualified customers. We get their household size and income level and so we can actually plug that into the calculator and enroll them in the correct discount tier up front instead of the top tier, and then have them calling back in to requalify if they feel like they might qualify for a greater discount. We talked about last meeting; it would be great if we could get that data for those LIHEAP only customers from the agencies through the portal potentially so that we could enroll them in the correct tier as well instead of at the 8 or 10% level. It helps get the customer in the right tier initially, but it also helps us avoid that additional call from the customer once we notify them that they have been auto enrolled. Yochi had the clever idea of, through the summer as we're preparing to do the initial auto enrollment, if we could collect that data ahead of time from the agencies that would be a big win. When we get the minutes for this meeting, I will pull out of those minutes, some of the key parameters that we've talked about that are going to be very similar to Avista and then some of the decisions we need to make around the verification process. We can keep this one as one of the topics for the next meeting.

Lorena Shah

I was just going to ask one more aspect of the verification that we have a chance to talk about today is, with PSE, our working plan is that the company will send over whatever that percentage is monthly to us so that we have 90 days to complete verification. Is the company at this point thinking similarly that the main thing is that these verifications be spread out over the year rather than having them given to us once a year? I am just trying to remember, is that kind of our current our thinking here too?

Tillis, Daniel

That definitely is one of the discussions points we have had in Oregon recently, there was some thought from the stakeholders that maybe they just do the verification annually and we very much disagree with that approach for a lot of reasons. One is the volume the agencies would have to work with and instead of more regular frequent volume and then just customers' lives are different a year from now and having asked them to remember the fact that they were going to need to potentially verify their income a year from now is difficult and getting them to answer the phone because they, you know, don't know why anybody's calling it. We definitely think monthly is the best and that would be a similar process at the end of the month, pull the selected percent of self-attested customers and then you work it from there. And then of course, we send our notifications from that list as well.

Misty Velasquez Community Action of Skagit

And we are thinking about quality doing the verification from the point of application, right? So, say they applied in November, we are looking at the prior month's income, October's income, that's how we do it now, is that like how you're planning on us doing it?

Tillis, Daniel

Yes, that's my current thinking, and that's current thinking in Oregon as well. I'm going to start wrapping us up here. I'll pull out these talking points into a separate list for us to go through the next meeting and keep the verification process as one of our discussion topics and so I think that brings us to our last the agenda item, which is setting the key topics for our next meeting. Lorena, you were going to touch base with Yochi on the current discounts, and Chris, are you going to send out an updated spreadsheet with those percentages or at least an e-mail with that section of the spreadsheet so that everybody can see that, and Lorena can share it?

Mickelson, Christopher

Yes, I can.

Tillis, Daniel

OK, great. Unless something changes, I'll assume we'll pull bill discount rate tiers and discount percentages off of our agenda items and add that to our agreements list. Our main topics will be post qualification verification process and potentially income collection. If we want to talk about that a little bit more - any suggestions on other topics? I was going to suggest getting started with the AMP discussion, since we're getting close to settling on the on the bill discount rate.

Lorena Shah

Was maximizing federal funds on that list?

Tillis, Daniel

It's on our list of things that we need to work on for sure. We can talk about that next if you want.

Lorena Shah

I know all of it feels equally important, so I understand the challenge of prioritizing, but if we could move that up to at least start the conversation, while we finish up these other ones, which would be awesome.

Tillis, Daniel

OK, sounds good. And I think Chris alluded to this earlier, but just to make sure everybody understood

what we're talking about, we have asked our IT team to figure out how we do that, how we exhaust any LIHEAP grant and credit it might create before we apply the EDP or the bill discount rate. That's fairly easy to do upfront if the LIHEAP grant comes in and creates a credit at the same time that we're adding the EDP, where it gets very difficult is that you know later getting it added to the discount and then later again if the during that two year discount period if the customer gets another LIHEAP grant that creates a credit, how do you then manage pulling that discount back for a while and then adding it again? Very likely it would be a manual process. I think Avista has set it up to have more automation and we probably will be able to get some automation. But again, our CC&B doesn't work exactly the way Avista's does. And so, you know we don't necessarily need to get in all the details with you, but just understand that we're working on that. That's our goal to make that happen. It just may be more with manual processes than we would like to. Alright, we'll start with maximizing federal funding, then circling back to the post qualification verification process as we review the list that we've talked about today. Potentially discussing the income collection process, if we get a list of those definitions before next meeting, we can see if we have any questions about those and talk about that a little bit more.

Mickelson, Christopher

I posted the spreadsheet. By the way, as part of the revised worksheet, I added a section here within the worksheet showing the audit based off 3% and this is it just kind of a rough number of how many of self-attestations in Oregon were getting say about 40% of the total, and so by county, you're kind of seeing roughly how many audits you would expect to see within the year, so some will have more and some will obviously have less, and that's partly due to population and everything else. So, you can say what if we did 5%, and maybe more people go through the agency and not the company, maybe it's 30% only go through the company, things of that nature. You can kind of play with it that way. Basically, what I'm saying is of this overall enrollment, 30% of them do self-attestation of that group, we will audit 5% of those customers. That's a yearly count.

Tillis, Daniel

We'll get the minutes out, next week because our team member who does those for us or a lot of that part of it for us is off all this week. But we'll get the agenda out with that as well.

Lorena Shah

Dan, do you want to take the next 5 minutes? Yochi just jumped on.

Tillis, Daniel

Oh, sure, yeah. Chris, share the spreadsheet again and I'll let you take back over.

Mickelson, Christopher

Here is, in essence, the tier levels we've come to agreement on. When you folks change this tier level you need to change the discount but rounding the discounts to the nearest whole percent. Initially we were proposing 7, you came with a 10, we kind of talked about our reasoning why the seven and we in essence settled at 8 with kind of the notion that, you know this program, it's kind of stage one and so as the program goes on throughout the years, we'll be looking at the data, taking actual data instead of some of the kind of hypotheticals based off good low-income research and analysis. But we'll have actual data points and see real bills for these customers once they're ultimately in these tiers and be able to go back and reevaluate. So, we settled with eight.

Yochi Zakai

The reason for 10 was because I was thinking that the customers that are going to come to us and ask for help within this top tier are going to be those that are experiencing either hardship or high energy burden and that we're not likely to see folks that are in need. And so, if we're seeing folks that are within that tier that are probably on the needy side, then it would be appropriate to give them a discount. That is a little bit more significant similarly to how we kind of set a minimum grant amount earlier.

Mickelson, Christopher

So you're talking the tier one discount?

Yochi Zakai

No, I'm talking about the Tier 5 discount.

Mickelson, Christopher

Tier 5 right now these customers technically really don't quite need it on an energy burden basis, and so using those funds in other places made more sense. These customers come to us for WEAFF and they're getting this type of funds to help with arrears, or however they're using WEAFF, and they'll still have that. So, this is really just kind of an added benefit to those customers.

Yochi Zakai

And if I could make one more point and just that when you look at the energy burden, I think especially in that top income tier, the thing we need to be mindful of is that that is an average for all customers in that tier. We are likely to see people coming to us and asking for assistance when they are in a situation that indicates a higher energy burden than the average or another form of hardship, so I think that is particularly true when you talk about the higher income tiers. You're not going to get someone who's in 80% AMI and is otherwise doing ok, that's likely to come in and ask for assistance. You're going to get people who actually need help.

Tillis, Daniel

Yeah, I think that's fair. And I think we're giving them help, whether it's 8% or 10%, but if we move it up to 10 just to give those individuals enough motivation to ask for help and follow through with the application process required to get that assistance and we're already decreasing their burden to lower than we're decreasing all the other tiers. I think it's more important to set the discount percentage at the right number in a consistent way of how we're setting it for the other tiers and let those customers decide if the percent discount is enough or is worth their effort. I think that's more important than taking the number that we think is more is going to be worth the customer's effort.

Yochi Zakai

I don't want to drag this on any longer. I apologize that I was late, but I guess the one part of it that I am going to continue to push back on is the assumption that it's the average customer that's seeking help in the top income tier because I think we're going to be seeing is customers that are more burdened and not at the average. But let me take this back and chat with the folks at TEP.

Tillis, Daniel

OK, thanks.

Sylvia Schaeffer

I just wanted to say, Yochi, you can listen to the audio. But Lorena, Misty and I were part of the conversation on being OK with the 8%. So, you can listen to what we talked about. And like Dan is talking about, you know, just making that 10% visually look like it's more even. I understand what you're talking about, the average but I think it's the agency doing the work, we're OK with the 8% and I think our clients will be as well. But that's just my opinion. I know Lorena is going to touch base with you on the conversation that was had, but I just wanted to throw that in.

Yochi Zakai

Yeah, sounds good. Happy to listen to the recording.

Tillis, Daniel

Thank you, Sylvia. Yochi, let me know if you all decide we should keep the percent discount as a topic for the next meeting. We had removed that since we had agreed on those percentages. Thanks everyone. Have a great rest of your day.

WEAF Advisory Group

Agenda

April 5, 2023

KEY TOPICS: Bill discount rate percentages, post-qualification verification process, income collection as part of qualification process

GOALS FOR MEETING OUTCOME: Finalize bill discount rate percentages, outline post-qualification verification process

1. Bill discount rate percentages – Chris Mickelson

Tillis, Daniel

Let's start with number one and I can share this with Yochi separately or you can get it from the recording or the minutes. We have a couple of personnel changes, one within the company and one with one of the agencies. Byron Pfordte, who was a member of my team and was Shannon's manager, has accepted an opportunity outside of the company, his last day is tomorrow. At this time, we're not going to backfill his position. For now, Shannon will report to Teri Sovak, who is on the meeting with us this time, and going forward, she'll be invited. Teri is our Manager of Credit and Collections and has been very involved in all of the Energy Assistance Program discussions internally that we have and is very knowledgeable on Washington programs, as they exist today. She has been involved in a lot of the conversations we've had with IT on options of creating a traditional AMP and also how we can utilize LIHEAP funds first, before utilizing ratepayer funds so she's in the loop on a lot of what we've discussed. I thought it was a natural fit for right now for Shannon to report to Teri because everything we do related to energy assistance impacts the disconnect process and the collections process, bad debt for the company, write offs that impact our ratepayers, etc. Frank Martinez has joined. Do you want to introduce yourself?

Frank Martinez

My name is Frank Martinez, and beginning this week, I am the Associate Director here for this division.

Tillis, Daniel

Welcome Frank and Teri. It looks like Yochi has joined us, so I think we can just dive right into #2. Yochi, we got your e-mail and had a quick internal discussion earlier today. Chris is going to take us through the bill discount rate changes or percentages and your feedback on the on Tier 1.

Mickelson, Christopher

Yochi, within your proposal you wanted to increase Tier 1 to 20% and keep the discount at 97%, that was not what was described within your original proposal, which you can actually see about 2/3 of the way down from the e-mail you sent last night. The overall arching goal has always been the energy burden as we've discussed at somewhere between 4 to 3% is Cascades portion of the overall

energy burden, so that's what we've always been trying to target. I know at 97 it takes a that Tier 1 below 0.9% energy burden, so thus almost putting all of that energy burden on Cascade customers, which doesn't seem appropriate. As so with that information, does that change your thinking or are you still trying to readjust the Tier 1 discount?

Yochi Zakai – Screen froze, coming back on

Charlee Thompson

Maybe while we're waiting, I can share a little bit about a recent conversation with Puget Sound Energy, which was similar to this one because they also started with the first tier being with the highest discount percentage 0 to 5% range. With a higher discount expanding to 0 to 20%, because the effect it zero to 5% versus 0 to 20% of income or federal poverty level, that income represents is still effectively 0 or is incredibly low no matter the county or the area that it's in so we decided, with PSE, to increase that first Tier to 0 to 20%, which was fine and also maintain a higher discount percentage. I think that's where this conversation is stemming from, US advocates and agencies who have been involved in those other conversations and trying to kind of get alignment there to hopefully pass that benefit for the first tier to a larger group of people who are who have the same income challenges, whether they're at 20% or 5%.

Mickelson, Christopher

So the 5% and the extremely high discount obviously originates with Avista because that's what their program was designed at. And that makes sense because at 5% the income really is basically close to zero, so you need a much larger discount to effectively move that energy burden. And so yes, as we adjust those tiers to a higher threshold, in this case 20% FPL, then the discount doesn't need to be as much since while still 20% FPL is a very low income, on an energy burden basis, it's obviously, like four times greater than that of someone who had a 5% FPL. Dan and I have talked, and we could do up to 90% of a discount, which would put the Tier One at a 3% energy burden, that's still at least justified. In essence, we would be saying natural gas is half of the energy burden which isn't really the case, but we could at least live with that. But going something less than one doesn't make sense at all, and I would have a hard time advocating for that in front of the Commission, let alone the added cost that would be layered on to Cascade customers.

Charlee Thompson

Yeah, that makes sense, Chris.

Yochi Zakai

Sorry about that, I lost all my Internet. I don't know what's going on but thank you for that explanation and I'm curious to hear what people think about setting it at 90%. I feel like that's something that I'm open to exploring if other folks in the agencies are supportive of setting the first tier at that level.

Tillis, Daniel

Chris, can you make the change to 90 just to show the energy burden decrease? Right now, it would be Tier 1-90%, Tier 2-71%. Tier 40%, Tier 4-15% and Tier 5-8%. Does anyone have any objections to starting the first program year of the energy Rate Discount program at those levels? Charlee has no objections.

Yochi Zakai

And I also want to acknowledge that if someone wants to take time to think about that, we should probably make space for it.

Lorena Shah

I'm comfortable with that for a year one and just like all the little pieces where we're going to take a look at this after some time has gone by for a year or two just to ensure that we are keeping people around 3%. I'm comfortable with 90% in Tier 1.

Tillis, Daniel

Great. In addition to whether or not you have objections, if anybody wants time to think about it obviously, we want to make this decision pretty quickly here so that we can give the data to our IT team to start working on this aspect of it.

Corey Dahl (PCU-he/him) (Guest)

I echo the sentiments of everyone. I think that looks fine and acceptable for year one and just reiterate comments that it will be important to have another bite at the apple for to assess what's working here and what isn't with specific relation to the discounts and even perhaps if the tiers are set at the right income levels.

Tillis, Daniel

Great.

Mickelson, Christopher
Commission staff.

Moline, Heather (UTC)

Nothing to add. Thank you.

Tillis, Daniel

OK. Well, I think we have consensus on our five tiers. The ranges within those tiers and the discount level.

2. Post-Qualification Verification process, starting with explanation of sample – Chris Mickelson

Mickelson, Christopher

Woo Hoo! The next item Yochi was asking about the audit piece. This was more of an information that the agencies were wanting to get a sense of how many audits they would possibly be looking at within a program year. What we created was, based off the county and the number of customers of within those counties that are possibly low income, we figured out what percent of those customers would likely be self-certified, and that information is based off what we're seeing in Oregon. So, that percentage is 17%. It's a number you can adjust accordingly. You can make it 20, 15, but it's probably somewhere around there in all likelihood. And then the 5% which is being reflected right now is kind of the condition that we've been talking about whether we audit up to 3% or audit up to 5% of those customers. And so, you kind of got a sense of roughly how many you're looking at for each county and possible audits within those counties. So Yochi this more for you, is that sufficient enough or do you truly need a write up of that?

Yochi Zakai

No, that's good. The 17% was the self-attestation rate seems low to me, but if that's what you're seeing elsewhere, then that's a good to know where that assumption came from.

Mickelson, Christopher

That's what we're seeing in Oregon right now. Of course, we're only six months into the program year and so obviously after a full year, that number could go higher or lower depending on the overall number of customers who enroll.

Misty Velasquez Community Action of Skagit (Guest)

This is misty. I was just curious if there's any way to determine based off of how many people in our area are getting WEAFF currently, how many come to us for WEAFF. And because I am going to assume that all the people that we serve for WEAFF, they're going to sign up for this program once they learn about it.

Mickelson, Christopher

If you go to the assistant tab, the fourth column indicates the number of WEAFF applicants, while the third column shows the number of total company customers within those counties. And if you go seventh column, you'll see who the LIHEAP customers are.

Misty Velasquez Community Action of Skagit (Guest)

Right. I guess I'm just curious how I could figure that out on my own, how would that equate to the 17% that Oregon is showing right now.

Tillis, Daniel

Hey, Chris, I had a thought and I just put it in the chat to you, that 17%, does that include the customers we initially auto enrolled based on prior energy assistance having been received or is that 17% only the customers who have enrolled through self-attestation outside of that group of auto enrolled customers.

Mickelson, Christopher

Yeah, this 17% is only those who actually self-certify, not any auto enrollment or customers who received energy efficiency in the last 12 months.

Tillis, Daniel

OK. So those customers who we auto enrolled on or about October 1 of 2022 are not in your denominator?

Mickelson, Christopher

The numerator, I think, but yes.

Tillis, Daniel

Well, no, it'd be it'd be denominator because these are rough numbers. So, we auto enrolled about 2500 Oregon customers and those were not through self-attestation, so they should not be in the calculation, in the denominator to determine how many self-attested going through the normal qualification process, either through the company directly or through the agency, right? I'm sorry, I should have thought of this question earlier when we met.

Mickelson, Christopher

So in that instance, no, because basically we've had about 600 customers or 550 customers who self-certified out of 3300 customers. You take that 550 over the 3300, that should be right around 17%. Of that 3300, 2500 we went back and automatically signed up because they have received WEAF or LIHEAP in the last 12 months, they would have been included in the denominator.

Tillis, Daniel

But they really should be able to get to that number who are self-attesting, who potentially would need to be in the pool to be randomly selected for the post qualification verification process, right?

Mickelson, Christopher

Really all your're saying is out of the 500 customers we're going to take Oregon as an example, of the 500 and say 50 customers that have self-certify 5% of that group we will audit.

Tillis, Daniel

And then you have to take that and try to extrapolate that to Washington customer base size, so to Yochi's point earlier of being surprised by the 17%, I think that number is that low because it includes the customers we auto enrolled in the calculation in the denominator. And so, it's actually skewing the percent who have enrolled via self-attestation since October 1, either going through the company or an Oregon agency.

Yochi Zakai

Thank you. That makes sense. I would agree that we don't need to have what we prefer to call a verification process as a that's just a term that's used elsewhere in energy assistance and low-income programming. I would just encourage us to switch the terminology to verification or income verification. I think for auto enrolled customers, income verification should not be necessary because they had their income verified within the past 12 months when they originally enrolled in WEAF.

Tillis, Daniel

Agree. If a customer qualifies for an AMP, LIHEAP, or winter help through income verification, they would not be subject to post qualification verification income verification. We will want to have a process where we receive that income, data, and household FPL AMI data so that we can enroll them in the correct tier, which I think the portal will be our source for that. The pool will only be those who verify through self-attestation.

Yochi Zakai

Would Cascade have some of that income data from folks that enroll in this program year or is that something that the agencies would have to provide? Or is it kind of a mix of the two?

Tillis, Daniel

The agencies send us FPL and I think AMI through the portal, Shannon keep me straight. For any customer they qualify we should have that, I think. I'll ask a question that I should maybe know the answer to, but are the agencies the only organizations that qualify customers for LIHEAP in the state of Washington? I ask that question because in Oregon, for sure, and I'm not sure about Washington, sometimes we get a just a pledge that comes or a check that just arrives into our accounting team from the state that is to be applied to a customer's account, and those customers we've been

enrolling them just at the lowest Tier 4 level, Oregon only has 4 tiers. We've just recently gotten our hands on that OHCS data after we finalized our data sharing agreement where we now get household size and income. So, we can calculate FPL and SMI. In the case of Oregon for those customers, we get them into the right tier, there are times when customers would qualify for LIHEAP and we're not getting the FPL AMI, then we have to figure out a way to get that. Anybody have any insight on how that's working in Washington? Shannon or any of the agencies?

Steed, Shannon

Right now I do get the FPL information from the agencies when they submit pledges or AMI, if they should qualify customer that way. I do recall receiving very occasional LIHEAP pledges from, I believe it's DSHS in Washington, they're not very often, but I do believe I get those from Washington. But as far as actual income in dollars, we don't retain any of that and we don't get that from the agencies.

Tillis, Daniel

But we get the FPL or AMI that we need?

Steed, Shannon

We do.

Misty Velasquez Community Action of Skagit (Guest)

I can say that with the FPL it comes from the calculation form that we do when we are calculating the benefit. That's how we determine what the FPL is to give you guys. So, if we're not determining benefits for these clients, we wouldn't have a way of determining that FPL for you. If we're not doing WEAf, how are we determining a benefit if our LIHEAP calculator does not determine the FPL.

Tillis, Daniel

The arrearage management arrearage forgiveness you would. I think the plan is you will calculate that as well as the LIHEAP.

Misty Velasquez Community Action of Skagit (Guest)

Yes, but our LIHEAP doesn't calculate an FPL.

Tillis, Daniel

How does it calculate?

Misty Velasquez Community Action of Skagit (Guest)

We don't. It doesn't tell us what the FPL is, it just calculates a benefit. The only calculator of ours that calculates an FPL is the WEAf calculator.

Lorena Shah

Am I correct though that CNG will provide us with both a BDR and an arrearage management plan type calculator of some sort?

Tillis, Daniel

Correct, yes.

Lorena Shah

It'll just replace the WEAf one. OK.

Misty Velasquez Community Action of Skagit (Guest)

But what if clients don't have AMP, what if they are not behind in anything and they're just calling to apply for it?

Lorena Shah

Then there'll be a calculator for the BDR.

Tillis, Daniel

Right for the bill discount rate, right?

Misty Velasquez Community Action of Skagit (Guest)

OK. But you're talking about needing the FPL for the people who you're just automatically going to enroll.

Tillis, Daniel

Well, we'll auto.

Lorena Shah

Which are people that we saw this year.

Misty Velasquez Community Action of Skagit (Guest)

So we're going to go off of this year's FPL and not their current at that time, is that how we're planning on doing that?

Tillis, Daniel

Yes, and we'll send all of those customers a letter and or e-mail letting them know that they qualified in the discount level and to contact the company if they feel like they might qualify at a different level.

Misty Velasquez Community Action of Skagit (Guest)

So then maybe the easiest way would be for you guys to send us a list of everyone and then we go into our records and just fill in that spreadsheet and send it back to you.

Tillis, Daniel

Well, we should be able to pull it from our portal since you've already submitted that in in the portal, right?

Misty Velasquez Community Action of Skagit (Guest)

True, for WEAFF. If they only got LIHEAP, no, which isn't likely.

Tillis, Daniel

OK, if they got winter help, we should have it in our portal.

Misty Velasquez Community Action of Skagit (Guest)

Yes.

Tillis, Daniel

But if they got LIHEAP, you don't enter those into the portal.

Misty Velasquez Community Action of Skagit (Guest)

I don't believe so.

Tillis, Daniel

Do you enter the pledge into the portal and just not the FPL AMI? I think in that case I think you're right, I think we can pull those LIHEAP only pledges out of our portal and send them to each agency to ask you to pull their records and calculate FPL or AMI would have been on the income and household data you have using and send that back to us.

Lorena Shah

Yeah. I just wanted to say I think that'll work just fine. I think the reverse is more true that there's more people that get WEAFF. When I was looking at our numbers on the assistance tab, we had five more people that got WEAFF that didn't get LIHEAP. So, I think it's going to be such a small list, if any, that you need to send out that got LIHEAP and not WEAFF. I think the agencies will be able to go back and use a calculator to hand calculate it, it just should be so minimal. We're the biggest agency. I just don't see it being a big burden.

Misty Velasquez Community Action of Skagit (Guest)

I don't think it's going to be a burden. I was just curious of how I was going to work through it. Yeah, I don't believe we served that many more people who get LIHEAP and not WEAFF.

Sylvia Schaeffer

Here at Blue Mountain Action Council we have our database that we keep track of all our services through Cap 60, that's where we pull our FPL off of for any other information that's needed when we submit our pledges for LIHEAP on the portal. We pull them off of that because it does give us that information, so it's not going to be an issue for us for sure.

Tillis, Daniel

OK, great. Thank you, I think we that it was a good discussion. We really worked through our auto enrollment process there. We could enroll them at the Tier 4, Yochi if we don't have the income information, we know that their FPL is no higher than 150% yeah good point. We'll pull all WEAFF and winter help data out of our portal instead of our CC&B system, which is what we did and Oregon, it does not have income data or FPL or AMI and we'll utilize that to auto enroll those customers into the correct tier and then send the agencies a list of any LIHEAP only pledges we received from October 1, 2022 through September 30th, 2023. We will ask the agencies to Calculate FPL and AMI for those customers using the new calculator rule and send that back to us and we'll get those customers either auto enrolled into the correct tier. If we don't have the data at all, we'll auto enroll them into Tier 4 level discount which we agree to a 15%.

Charlee Thompson

Yeah, that sounds good to me.

3. Income collection as part of Bill discount qualification process (if time permits) – CAAs

Mickelson, Christopher

I am not as familiar with the verification process, but more than happy to take suggestions. And like Dan said, he'll kind of review the minutes later. I would just say any questions that are outstanding we will hopefully have answers next week.

Charlee Thompson

I can walk through the rest of this verification. We talked about everything on what's being displayed right now on this first slide from Avista. The main two things that we need to talk about was what to do with nonrespondents and then how many communication touch points are for the customers when they go through the utility versus the agency. The purpose of the 90-day window is to communicate to customers that they have this allotted time to respond to the request for verification to contact their agency. If they need to change that, they have time to do that. We decided if it was after that 90-day window, it's not an immediate removal from the program or removal of benefit. It will be after one more month, so on 120th day or 121st Day is the point in which the benefit actually stops. That originated from discussion surrounding data and stats from California programs; most people that are removed from non-response to verification still qualify for the program and the benefits. So, this was our determined way to keep that benefit there for as long as possible and keep that opportunity to respond to verification there for as long as possible.

Mickelson, Christopher

Quick question, and I'm just curious from my standpoint, so for 4 months, the person can basically keep receiving a benefit? Are these particular customers held harmless or how's that handled? Do these customers have to pay back any of those benefits they received or are they held harmless?

Charlee Thompson

No, they don't. They definitely don't have to pay back any benefit that they receive. In this way they are I guess held harmless but there are subsequent bullets, other measures that are trying to act as safety backdrops for the customers, but to hopefully incentivize or get customers to respond within the 90 day timeline. I can walk through those and that might give a more holistic picture and you all of course can read along.

The second bullet came out of a lot of discussion, and I think everyone in the Avista BDR subcommittee is happy with how this landed. This is to incentivize customers to respond within the 90-day window. If the customer does not respond they aren't incentivized to get back with the program to reenroll by receiving any credits for those three months up to three months that they did not respond. If they were off the program like on the 4th month or on the 5th month away from their notice to come in for verification, they reach out to their cap agency or the utility and ask to get back on this program due to circumstances. They can be credited for up to three months, three additional months that they missed. It's more incentive to get back in and call their agency and get back on the program as soon as possible. The third bullet - we had some agencies in the subcommittee say well maybe we can take this 90 day window, if we have information from LIHEAP or other programs, if we information, or the customer comes in later and has some sort of income based data that can be used to verify their income for the BDR, then the agency has the discretion to take that opportunity to try and verify the customer themselves, even if the customer does not come in. What is still being discussed at Avista is this sub bullet or I guess the second dash under the third bullet. How can we handle particularly medically friend style customers who might have data somewhere that can help them stay on the program if they don't reach out. Or are there any other backstops we want to provide for medically fragile customers such as do we give them a longer term of length of enrollment in the program? Do we give them extra time to respond to request etc. Details on the medically fragile customers are still being discussed, but this idea that agencies have discretion to verify customers if they can, if the customer is not reaching out, is available. The last

thing that I certainly want to know here is this last bullet on the page, which I think we talked about last time we met; the two-year term for enrollment or whatever length of time we decide on for the program is going to start. For customers who are verified it will restart at that date of verification because they have come in and because they're income is enrolled now, they get the benefit again of having their length start from there, so that was another incentive for having people come in within the 90 day window if they can.

Mickelson, Christopher

I'll get back to the held harmless in that for touch points, how many are there actually? Is there six?

Charlee Thompson

Yes.

Mickelson, Christopher

So there's actually six different touch points. Wow. OK, that's that seems like quite a few.

Charlee Thompson

Yes, I think this came up with PSE, too. But two of those touch points are from the utility, and that's the first one being a letter from the utility saying you've been randomly selected for verification. Here's the process and here's the information for your cap agency, please reach out, here's the timeline, etc. The 2nd letter from utility is notifying customers of removal from the program and again contact your agency to get back onto the program. The four touch points in between those two letters at the beginning and end from the utility, at least for Avista, was discussed to be coming from the agency. Three were notices, whether it's e-mail or phone call or whatever, that preferred communication method is within the 90 day period saying respond to this request so we can continue your enrollment on the program, here are some documents you can provide or whatever that might be that communication is still has to be figured out whether this stuff. The 4th communication from the agency after those notices to respond is the final, please respond before you're removed, before receiving the letter from the utility that they have been removed. I think six sounds like a lot, but it is spread out over the 100–120-day period where five of those communications are happening during the 90 days informing the customer that they've been selected and informing them to please respond

Misty Velasquez Community Action of Skagit (Guest)

So is the very first touch point from Cascade natural gas and they're informing the client to get in touch with the agency at that point in the customer doesn't reply, the agency reaches out? The agency isn't going to reach out to them. Is that what I'm gathering from this because I can see some concerns with waiting for customers to contact us if that's the route that this is going to go, or if that's what we're talking about.

Charlee Thompson

The diagram or the setup for the timeline from Avista on second page, blue arrows outlining that. Initially, the utility is going to say you've been selected for verification and then it's basically the CAP agencies are going to notify three times in the preferred communication method.

Misty Velasquez Community Action of Skagit (Guest)

The reason I see a concern with Cascade natural gas sending out a letter to the people is because, and I don't know about everyone, but when I get letters in the mail from things, I just throw them aside. I don't look at my mail but every six weeks because all of my bills I pay online. So, if something's going in the mail to a client, I can just see it being thrown away, especially with clients who have issues paying bills or things like that, they tend to ignore things that maybe are very important.

Charlee Thompson

That's a good concern. So maybe that's a discussion as who does the initial and final letter come from the utility, does it come to the agency, does that add more work to the agency, etc.?

Lorena Shah

I think it needs to be from the utility, as Dan mentioned earlier, a letter for those that have not opted into e-mail or that is their preferred will make some assumption they're reading their mail. But I hear you, Misty. So hopefully for those that have opted into e-mail or where we collect that e-mail is the preferred over mail then then they would get an e-mail. I do think however though once that communication goes out that there are going to be a handful of people or more than a handful of that are really skeptical as to why this agency is contacting them because they won't have read their e-mail and they won't have read their letter. I think it would be probably pretty handy for the agencies also to have copies of that letter so that we can squall people's fear of us being a scam. We'll have those letters available, and we can encourage all of this, I think is kind of part of that more detailed planning. We can encourage them to call CNG and verify this information and whatever that conversation looks like

Misty Velasquez Community Action of Skagit (Guest)

I agree with what you're saying, Lorena, but I also think that maybe that first touch should be the letter from Cascade Natural gas of contact, but it shouldn't be counted as one of their six contacts. If we are the ones doing the verification, we need to be contacting the client because they're not going to call us.

Lorena Shah

That's how I envision it too, is that that the letter goes out or e-mail goes out to client. We wait a normal amount of mail time and then we're picking up the phone, we're sending emails, we're sending letters, whatever that customers preference is to get them in. I would not wait on a customer to call us personally. Then we're going to try those three times, if there is no response, we do that final letter. And I guess one thing we have to determine is that letter saying you didn't respond and we're now passing you back over to the utility or is that letter you have five days to respond? There's probably a little bit of work to do in the three or four contacts, exactly what those are going to look like, but my agency is going to be proactively trying to reach these folks to wrap it up.

Corey Dahl (PCU-he/him) (Guest)

I don't have anything to add, Lorena. You touched on the point that I mentioned earlier, being mindful of the preferred method of contact and aiming to make communication via that way, particularly from the utility. The other thing that I think would be helpful and I believe the agencies would keep this information, as just keeping a record of, how customers were ultimately reached or

how they responded to the request for verification and after how many contacts? I think that's going to be really good information to have.

Mickelson, Christopher

So going back to the burn 20 days, that seems like very long time to receive benefits. I have to balance the position of helping these customers while also being good stewards to all of the other customers, money. For what 1/3 of the year seems like a long time to be able to verify, just something to consider

Misty Velasquez Community Action of Skagit (Guest)

I'm wondering if the 90 day is because by the time we get done with our 90 days trying to get in touch with the client, getting the rest of that information to you might be past that 90 days and then they're in the fourth month already receiving some kind of benefit for that fourth month. I think that's where that came from it.

Charlee Thompson

I was going to add that it's like the back facing or back-end window that 120 day isn't advertised to customers who are enrolling program. They will be told they have 90 days to complete the verification and then 120 days is what the timeline of this does working on from start to finish on sending the first notice and then officially removing them from receiving benefits.

Corey Dahl (PCU-he/him) (Guest)

There will also be some lag time in when the information is sent over or gathered, and that the next billing cycle occurs anyway so I think that's part of the issue there too.

Mickelson, Christopher

So up to 120 days, but 90s kind of the minimum, and disconnect or termination from the program can happen anytime between 90 and 120.

Corey Dahl (PCU-he/him) (Guest)

Yeah, ultimately Avista's, yes. The customer would still have 90 days to respond. That doesn't change. There's just an extra 30 days built in

Mickelson, Christopher

I'm just trying to get a solid understanding when a termination can happen. If no verification understanding, there's kind of this piece here where if you come back later and verify that you basically can hop back on the program and retroactively have the benefits applied, so you're made whole either way, if it turns out you got terminated from the program due to whatever instance in your life.

Misty Velasquez Community Action of Skagit (Guest)

Right. So that last 30 days is basically administrative paperwork and getting the information to Cascade and you sending out the final letter to the client. And then on the last day of that 120 days or whatever the 121st day, there are actually removed from the program. I think that's still up for discussion with Cascade, but Avista has decided that it will be like the full extra month of benefit, so 121st day.

Corey Dahl (PCU-he/him) (Guest)

In terms of the discussions with Avista, for example, if the customer does respond within the first 30 days and it turns out there has to be some change to their eligibility, whether that be removal from the program or just to change in benefit based on a difference in the income that they submitted throughout self-attestation, which could obviously result in a smaller or larger benefits, there's 3 pathways that can change the benefit, whether it be any of those three things that that can happen sooner than the 120 day mark, correct?

Charlee Thompson

That's my understanding.

Misty Velasquez Community Action of Skagit (Guest)

It's just the people who don't respond.

Mickelson, Christopher

And for medical emergencies, you're still discussing with Avista, but why would they need additional time? Like what situations are you guys thinking about? Where 90-120 days isn't enough.

Charlee Thompson

We haven't gotten really into specific specifics of what situations might come up and when. That was one thing we should talk about is medically fragile customers. But I think where we're headed right now in the discussion with these costs, this subset of customers is if there is a way to keep customers from any other means that agencies might have to be able to keep them on the program if they aren't being responsive within the 90-day window. The short answer is when I have more information about how Avista is handling this and what examples might come up, then I'll bring it back here.

Mickelson, Christopher

It looks like they're talking about a two-year term from verification. Are there any concerns from agencies about doing a two-year term since I know LIHEAP is annually, is there any appetite, maybe for this first program year or maybe first couple of program years only do a one-year term until we kind of get a sense of discount tier levels. It looks like there is possibly a concern about getting clients to come back on an annual base to get LIHEAP, in addition to this program. So maybe do one year term for the first couple of stages of these program might be a good idea.

Charlee Thompson

I think this is one where I want to have or hear more from other parties here on what they think Avista PC kind of split in their thinking here, Avista decided on two year to make it easier for customers who are enrolling and to because the goal of the program is to have this be an opportunity to have increased enrollment and penetration for assistance and they thought this would kind of break down a barrier, because we know that there's a significant drop off of customers after one year from California data. PSE decided on a one-year term because their PSE help program, which they're going to continue to implement, at least in the first year of the BDR program, is on a one-year basis as well. And then the concern that Misty brought up was also brought up in the PSE discussion, so I personally lean towards the two years, but curious what others think.

Corey Dahl (PCU-he/him) (Guest)

I agree, I'd like to explore the two years but it might take some more time as Lorena had mentioned in conjunction with the discussion about maximizing federal dollars along with this element of the program. And in particular, I'd like to explore the two-year term with Cascade because WEAFF would not be carrying forward so that analog that PSE has in terms of their help program continuing, it just isn't here for Cascade. So that that's why I think it makes sense to pursue discussion on two years.

4. Maximizing Federal Funding (if time permits) – Dan Tillis

Tillis, Daniel

Well, that wasn't on the agenda, but it was a great discussion and Yochi before you joined, I did share that I need a drop off 1/2 an hour early for another meeting. We've got about 20 minutes left with me on and then we'll let you all decide if you want to continue. I'm going to share the agenda again because I've added some info while we've been talking for the next topic. We also had on the agenda, if time permits the income collection as part of the bill discount qualification process and maximizing federal funding. Before we move one, I was going to go through Avista's approach to the income verification process to see if we want to align with Avista. And in that process, we talked about aligning a lot of it last week and that's how we got into the discussion of what the volume might look like. If anybody would rather talk about these other two topics, we could do that as well. Does anybody prefer to discuss either income collection during qualification or maximizing federal funding instead of trying to maybe get close to alignment on the income verification process? No- OK. We'll go through it, I apologize, the plan was for me to pull the some of the agreements we made last week on this or close to agreements on the meeting minutes. The person who does those minutes for us was off last week and didn't have the recording until yesterday, so she hasn't been able to put together the minutes yet. Between last week's discussion and this week's, we'll definitely have something for next week for us to review. We've all agreed that we'll pull a random sample without considering any other information as far as demographics or account information or anything like that, we'll pull a random sample from the pool of customers who qualify through self-attestation. We have agreed on a percent of those, we were looking at 3%. We've talked about that some in these meetings, it feels a little low. I think I've thrown out 5% recently. I'll just pause there and see if anybody has any opinions on the percentage if we wanted to do 6% to align with Avista, it's only 1% more than five. I'd be fine with that; PSE is using five. Everybody OK to use 5%? I see you in a couple thumbs up. I don't hear any objections. We'll go with 5% for right now.

We agreed many meetings ago that the agencies will conduct the income verification process. It will be a monthly random selection process with new accounts to verify provided to the agencies each month, our goal is to do that via our assist portal. We will need to see if we'll have that ready by then, but the goal is to use the assist portal. Avista is going to use 90 day window to allow the customer to provide to respond and provide income verification and I think I initially said that 90 days feels like a long time, but through the conversation I think you all convinced me that 90 days is probably a good starting point, so I'm comfortable with that at this point. Anybody have any different opinion on using 90 days? Misty is good - OK.

Yochi Zakai

Dan, can I ask for a clarification? I don't know if you went over this, the 5% would be 5% of each agency's enrollment for that month, that way we just avoid clumping if it's 5% Cascade wide, it could be that the workload disproportionately impacts an agency, which is I think something we want to avoid.

Tillis, Daniel

OK, that is definitely not something we talked about last week. I guess if we did 5% by ZIP code, we could probably get there. I would think that might be the best way to do it. Any thoughts on that Chris?

Mickelson, Christopher

So you're wanting to do 5% at basically each county? Some agencies have multiple counties, so I'm just trying to get a sense of how we would do that audit process because we wouldn't really have the agency, so we would need to use county or zip and I would think county would be more in alignment with what the agencies deal with.

Yochi Zakai

Yeah, that sounds good. It looks like that's what folks in the chat are supportive of as well.

Tillis, Daniel

So 5% by counting randomly selected.

Mickelson, Christopher

The randomly selected 5% by county, that's only for the self-certified people, correct?

Tillis, Daniel

Yes. I think that's about as far as we got on going through the income verification process in the discussion. I looked through the Avista process earlier and other than the flow chart I think we can mostly align with their contact points. We don't really collect the customers preferred method of communication. Customers can opt into e-mail and if they opt in to e-mail for something like advising them that they've been auto enrolled into the bill discount rate program, we will send them an e-mail rather than send them a letter. We would assume if they're opting in the e-mail there, that's a good communication method to reach them and if they're not opted in an e-mail then we would send them a letter for example, so we would approach it in that way. If we don't hear from them, send them a letter for example to a different touch point.

Lorena Shah

In that scenario, will we know as the Agency doing the eligibility verification if they've opted into e-mail or not? Because I think that's more for the agencies on how we can most likely get in touch with the clients once they are passed over to us, after the letter goes out or e-mail goes out from the utility. The idea would be to try to first reach them on their preferred communication method whether that's phone, e-mail, or mail. Would we get that information whether they've opted into e-mail or not?

Tillis, Daniel

I think we could definitely tell you whether or not they opted into e-mail and we don't typically share a customer's e-mail address with third parties because they've shared it with us for specific purposes. We do have an energy assistance category that they opt into and that may not be the exact name of it, but it's one of the purposes it's used for. If they're opting into that, then I'll have to check to see if we'd be OK with sharing their e-mail address with you.

Lorena Shah

I guess in my mind, I had envisioned that if they are applying with the utility company directly that the application would include that that question about what's your preferred and would have that information and then somewhere in that application there would be an acknowledgement that your information will be shared or may be shared with the Community Action Agency, whatever we decide on how we want to word that. But there would be some level of acknowledgement that they would have to acknowledge that the information would be shared with us. Otherwise, we won't have the contact information we need to reach them quickly and efficiently.

Tillis, Daniel

That's a good point. I hadn't thought about building that into the into the CSR flow and in the discussion. We can look to see if that's an option to build that in there and then record that preferred method somehow. We don't have a place in CC&B to record it currently, I don't think. We may be able to possibly add an option to collect it for the preferred method and then get their consent to share it could be part of our talk off when we tell them that they might be subject to a post qualification income verification process. Their preferred language is actually something that we're starting to collect and so we could build that in as well. Lorena from your chat - 7. We do have the ability to record that in CC&B, it's not something we've been recording, but there's actually a new requirement in Oregon that we start asking that question on new service starts. We are starting that process and so we can build that into that flow as well for Washington to start collecting that.

Charlee Thompson

I like this conversation and the creative ideas popping up here. This is this is great. I was kind of thinking also in to add ways or options or opportunities to ask what customers preferred communications methods are, whether that be people coming in to sign up for BDR or people coming in for verification. Or maybe I think Lorena mentioned this, asking it on the application itself. There are ways to ask for this and then have that effective communication with the customers.

Tillis, Daniel

I don't know that we have time to really get into all the touch points today and all could stay on after I drop and try to work through some of that if you want. But I think it would be a good topic for the next meeting to go through the details of all the touch points that Avista is going to use and just agree on what it might look like for Cascade. We can go through some of these other bullets as well, just to talk through those. If they don't respond they're removed from the bill discount rate, but if they respond shortly thereafter, they can be set back up on it. There's some of that detail in here that we can get into that next time, or you all could continue.

Yochi Zakai

We can continue staying on, I think considering our timing constraints I would support continuing the conversation for another half hour. The other thing I wanted to know was, since we were discussing the application, I don't know if we have this noted as a consensus item, but I wanted to make sure that we're on the same page about this. I was envisioning that sharing information on the application would be kind of condition

Lorena Shah

I can pipe in for Yochi for a second. We're thinking is that the customer would need to agree that their

information will be shared as a condition of enrollment, since it is likely that it will be shared at some point for the eligibility verification. So, that needs to be on the front end where a condition of enrollment is agreeing to have your information shared with the agencies.

Tillis, Daniel

That makes sense. I'll check our privacy policy; it may already be covered in there. I know that we mentioned in our privacy policy for sure that we may share information with third parties for purposes like energy efficiency. As an example. I just cannot remember what all else is in there. If it's not, then we'll have to establish a new process for that and get that consent during the conversation and recording that somehow. We will need to get it on our website if they apply it to our website, but the vast majority of our applications are likely to come through our CSR's and credit team. I need to drop, I'll let Chris and Teri take the conversation from here and I'll check the video and the minutes to catch up on everything you all talk about. Have a great rest of your day.

5. Set key topic(s) for next meeting – Dan Tillis

Yochi Zakai

I think it would be nice if we could wrap up verification and see if we can get agreement on anything and then move to have a full discussion on the one year versus two-year term.

Charlee Thompson

Seems like we have our agenda items for next time then.

Charlee Thompson

We made good progress today.

Mickelson, Christopher

Yes, we did. Thank you everyone and look forward to more of this discussion next week.

6.

April 14, 2023

Ms. Amanda Maxwell
Executive Director and Secretary
Washington Utilities & Transportation Commission
621 Woodland Square Loop SE
Lacey, WA 98503

Regarding: UG-210755 Compliance Filing to Commission Request for Updates to Advisory Group Pursuant to Order 09

Dear Ms. Maxwell:

In compliance with Paragraph No. 78 of Order 09 in Docket No. UG-210755, Cascade Natural Gas Corporation (“Cascade”) encloses for filing the WEAFF advisory meeting minutes. The following documents are submitted electronically as part of this filing:

- UG-210755-WEAF-Agenda-04-14-2023.pdf

If you have any questions, please contact me at 509.734.4549.

Sincerely,

Christopher Mickelson

Christopher Mickelson
Manager, Regulatory Affairs
Cascade Natural Gas Corporation
8113 W. Grandridge Blvd.
Kennewick, WA 99336
Christopher.Mickelson@cngc.com

Attachment

WEAF Advisory Group

Agenda

April 12, 2023

KEY TOPICS: *Post-qualification verification process, income collection as part of qualification process*

GOALS FOR MEETING OUTCOME: *Outline all components of the post-qualification income verification process, finalize income collection process, begin discussion on maximizing federal funds (if time permits)*

1. Post-Qualification Verification process – Dan Tillis

From Avista:

Verification What we've agreed upon	
Verification	Intent to verify the program is engaging the intended population and providing the appropriate level of benefit
	<ul style="list-style-type: none">▪ Completely random selected pulled from the previous month's enrollments and no use of probability characteristics for identifying customers for verification because of the potential of the perception of bias (e.g., high energy users, high discount percentage)▪ 6% of the total enrollment pool for random selection. Those who have been verified will be captured in the verified percentage amount but will not be required to complete verification
	The agencies support the monthly verification with a 90-day completion window once the process is started
	The terminated from the program letter should: <ul style="list-style-type: none">▪ address the reason with detail around the customer situation, such as:▪ terminated because they were found to be ineligible are informed to contact their local CAA if their household situation changes▪ non-respondents can contact their local CAA to complete the verification process to be re-enrolled into the program, if qualified

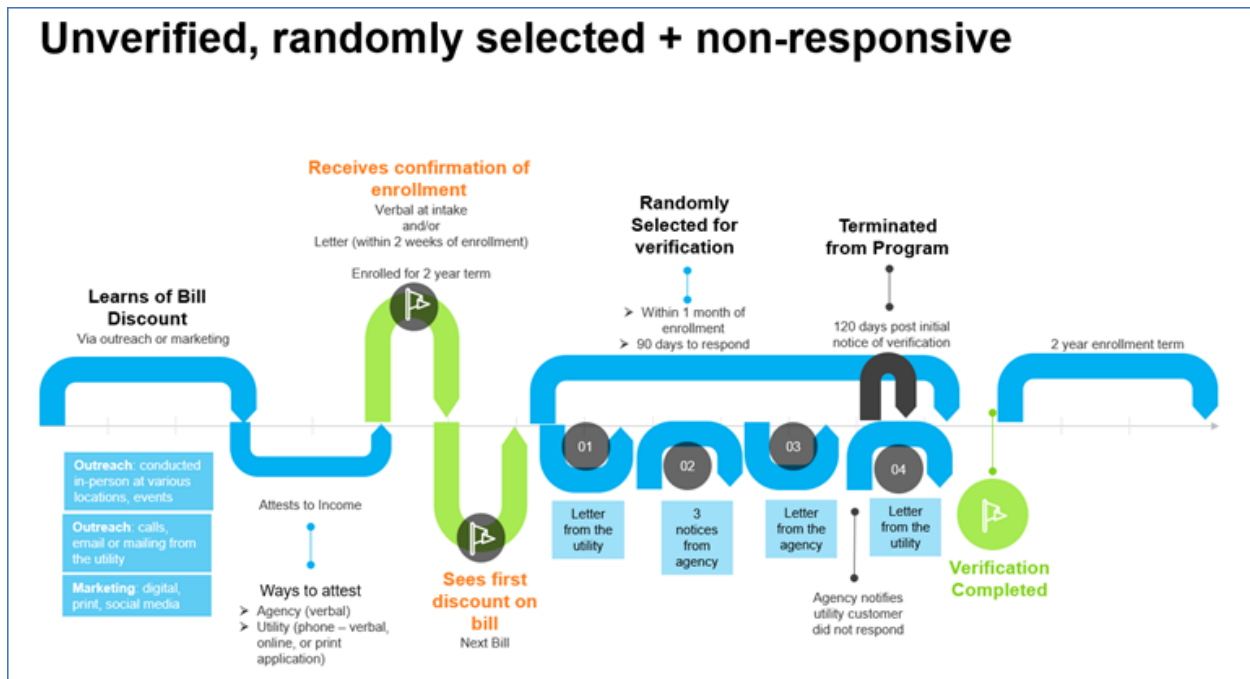
Verification What we've agreed upon, continued

Verification

- Randomly selected participants will be notified there is 90-day timeline to complete the verification. If they do not respond within the 90-day window they will be terminated from the program.
 - If the participant does not complete verification, they will be terminated at 120-day point
- Randomly selected participants who have been terminated for non-response, and complete verification within 90 days post termination will receive a credit for the months they were not enrolled in the program
 - the credits should be specific for 1, 2 or 3 months and by income tier
- Non-responsive individuals may be verified by either of the following methods for continued participation in the program:
 - agency verification based on data
 - customer is identified as medically fragile (term to be defined; with consideration for WAC 480-100-128(8) that discusses medical emergencies)
- The verification notices/reminders from the agencies should be in the customer's preferred contact method, where possible (e.g., phone call, text, email or letter)
- The number of touches is sufficient (i.e., 2 letters from utility, 3 notices/reminders in customer preferred method for contact, and 1 letter from the agency).
- The 2-year term starts from the date of verification

WAC 480-100-128

Unverified, randomly selected + non-responsive



Tillis, Daniel

We had a very, very productive meeting last week. Lots of important decisions and hopefully we can continue some of that this week. I had to drop 30 minutes early last week, but I did read through the minutes, so I'm up to speed on a lot. What I pulled out of the minutes for discussion was continuing the post qualification verification process discussion and we still have income collections as part of the bill discount qualification process, as well as maximizing federal funding, both of those as next topics if time

permits. There was a lot of discussion about whether we should have the EDP, the bill discount rate last one year or two years, the collection process as part of the upfront qualification, and maximizing federal funding that we want to continue, does everyone agree with that?

Peter Damrosch

Yes, it sounds great.

Tillis, Daniel

Just a quick review of what we agreed to last week for the tiers and the percent discount, Tier 1-20% FPL, max 4% AMI, Tier 2 - 50% and 12%, Tier 3, 100% and 24%, Tier 4 - 50% and 36%, and then Tier 5 - 200% and 80% as max FPL and AMI, then discounts of 90%, 71%, 40%, 15% and 8% for those tiers. For the auto enrollment process, it wasn't on the agenda, but we took care of it anyways and this is what I collected as far as how we'll auto enroll customers and effective with the October 1, 2023, program start date, with the new bill discount rate and AMP hopefully in place by then. We'll pull all WEAFA, and Winter Help pledges from the prior program year, so October 1, 2022, to September 30th, 2023, from Cascades Assist Portal. We'll utilize FPL and AMI data that is provided by the agencies and up into that portal to auto enroll those customers into the correct tier. We'll then also pull all LIHEAP pledges from the assist portal that were submitted by the agencies, send those back to the agencies for them to use the calculator to add FPL and SMI and or FPL or AMI on to whatever format we provide those customer accounts and send them back to the company and then we'll utilize that data to also enroll those customers into the correct tier. If for some reason we're not able to get FPL and AMI for LIHEAP only qualified customers, then we'll auto enroll those customers into Tier 4 since we know that customers FPL is no greater than 150% since they qualified for LIHEAP. We'll set all those customers who are auto enrolled, letters advising what we've done and to contact the company if they have any questions or concerns or feel they should qualify for a different discount level. Any questions or feedback on that? Alright, hearing nothing, I'm going to assume I got it right. That took us to the rest of the discussion for the last week's meeting which was all about the post qualification income verification process, and we got 4 agreements and then lots of great discussion after that. And so those agreements were that we would do a monthly random selection of 5% of customers who qualified via self-attestation, customers who qualify with verified income documentation would not be in the pool of the 5% random selections. We'll attempt to do that selection by county to attempt to evenly distribute the accounts across the agencies based on customer account within the counties and agency size of course. Bigger agencies would have a greater selection, random selection pool and therefore we get more accounts to verify, but it would be proportionate to the agency size and the county size. Selected customers for the random sample will be provided to the agencies at the beginning of each month for income verification. Our goal is to use our assist portal to provide the accounts for verification. We don't know what all work will be required to do that yet, so we'll need to figure that out. And if we can't have that done by November, which would be our first random sample, then we would need to figure out an alternative alternate method. We agreed that the window after the random samples pulled would be 90 days for the agencies to then verify income for the selected customers. And then there was, of course a lot of discussion about some of the other points, but I think that's as far as we got as far as agreements go. Anything I missed or misrepresented? I want to pull the Avista slides back into this just for discussion purposes to have all on one view. They've shared this with the stakeholder group they're working with on establishing their bill discount rate and including the post qualification income verification process. I think we've covered a lot of this, certainly the top half of this part where we've all agreed to the

components that are in that section, we haven't talked about what should be in the terminated from the program letter yet, so we need to talk about that still and then we haven't made decisions on the 120 days versus 90, the 30 day window as a grace period where the customers not quite removed from the program yet. I also think on that second Avista slide we still need to discuss the provisions for protecting or helping customers that don't respond that likely still qualify, which is some of those points, like Avista's proposal to give a credit to customers who after their 90 day window is up if they come back in and complete the verification process, they'll receive credit for the month that they weren't enrolled in the program. So, to the customer, they have the full 90 days or three months from the start of being notified that they should come into an agency and show proof of program eligibility. Behind the scenes from the utility and agency systems perspective, that customer who might not have responded won't be removed from the program until 120 days is advertised to the customer that they have 90 days. But from the systems perspective, the customer gets their full 90-day opportunity to remain on the benefit program and also to respond, an extra month behind the scenes is happening so that the agency and the utility can do that work to remove the customer from the program.

Tillis, Daniel

We need to talk about preferred contact method because we have some issues there. Let's start on the 90 versus 120 days for the verification of income. To recap, what Charlee just shared, what we shared with the customer would be 90 days, that's the time frame they have, but we wouldn't remove them from the program until 120 days just to give time in case there's still work being done by the agencies or some other delay which would prevent us from removing the customer and then potentially having to add them back, which is the risk if we don't do that for the company, is that there's work to get them back on the program. Does anybody have any insight into how PSE is treating them?

Charlee Thompson

I think PSE is still working through how they're going to handle nonrespondents. Right now, the only thing they've decided is at some point customers who don't respond will be removed from the program, but then what extra precautions and provisions are around that hasn't been discussed yet, but if someone else who's working with Avista knows something that I don't, feel free to jump in.

Tillis, Daniel

We haven't had a chance to meet internally but I'm going to give you, my opinion. I don't have any issues with starting with the approach that Avista is using simply because you know we can always change it if we feel like it's failing. For some reason we're six months into our program in Oregon and we don't have a verification process in place there yet. I think we're getting very close, but it was one of those things that we were able to start there without working out every detail because it's under the law, it's a temporary program that must become permanent at some point. Allowing that extra 30-day grace period I'm OK with starting that way and seeing how it goes. Anybody have any objections to that? No. OK. If customer is non respondent and the 90-day period is up, then removed at 120 days, does the clock for the additional 90 days start after the initial 90 days or does it start after the 120 days for reinstatement and the credits.

Charlee Thompson

I think it starts after the 90 so that extra 30 leads up to the 120 is behind the scenes that the customer is on but hasn't been advertised so then they have the three months or the extra 90 days to come back and get that back credit for that was my understanding anyway.

Tillis, Daniel

So it's 180 days after the randomly selected basically, or their first outreach after their randomly selected.

Charlee Thompson

Yes.

Tillis, Daniel

OK. How would operationalize monitoring that and getting credits issued? I'm thinking that would have to be a manual process. I know some of the concerns shared last week is that we're essentially giving four months of a discount to a customer who may be non-responsive and we're not pulling any of that money back because it's a risk-free program which I think that Cascade's comfortable with. And then a customer could be given 180 days to verify and then we're doing a lot of work to pull them out of the program and put them back in with credits back dated to when we started the outreach to get them to respond.

Peter Damrosch

I worked with Yochi and the energy project for people I haven't met been involved in the Avista Northwest natural parallel processes, but not on Cascades. It's nice to join you all. I'm not sure if you talked about this last week, but some of the background motivation for this proposal is coming out of seeing what's been happening in California, where they've been seeing a lot of people don't respond to what they called post roll and verification. And then later, you get back on the program realizing that they were always eligible, and something came up that month or they didn't get the notice. I think the perspective for this option is recognizing that these are people who should have always been on the program, something happened, and they were removed, but they were always eligible - it would be great to sort of treat them that way. There are some implementation steps and of course we'll defer to you on whether you think it's something you could automate or do manually. Think of the automated world you would check to see if somebody who's been added to the program was removed for nonresponse and are they reenrolling within 90 days of when they were removed and then you could apply a broad looking credit. The system is much better in terms of whether that's doable from a more automated or semi-automated perspective.

Tillis, Daniel

That makes sense. I appreciate that it's being based on what's being sent and seen in California, so we have some information from experience with it anyways. I understand that they would have been qualified the whole time had they responded, I also see the side we're planning to tell customers when they do qualify that they may be selected for a post qualification verification process. A lot of the discussion last week was that Avista is going to start the term over when a customer goes through verification, and so it'd be another 12 or 24 months, depending on what we decide on. So, a customer who gets reenrolled, calls five months into the verification process would essentially be getting a 29-month term basically which isn't the end of the world, but they're getting something that the non-verified customers aren't getting. In that case, I don't know if staff has an opinion on if that's treating customers differently. I guess if you're selecting them for post enrollment verification, you're treating them differently as well. So, I may have just answered my own question, but I don't have a strong opinion either way. I think it's going to be difficult for us to operationalize and that makes me a little

resistant. But I don't want to just be resistant because it's difficult to operationalize so Teri, you're on and you'll be helping operationalize a lot of this; what are your thoughts?

Sovak, Teri

It's hard to say. We just have the little bit of experience that we have with the one program so far and a lot of that has been manual to start, so I know what we can do at the beginning and what we can do down the road might be a couple of different things, but I anticipate that you know much of it will be manual to start.

Tillis, Daniel

Chris has mentioned in the past that we try to align with Avista because we have a lot of overlap with them and I'm trying my best to keep us as close to this as we can. Understanding we're not the same, in a lot of ways, I guess this is one we could attempt to try to do in the same way they do and if it's not working, we'll adjust. Ninety days feels like a long time. Any thoughts on making these 60 days, almost half a year versus the be five months instead of six months, essentially that they'd have from when we initially started reaching out because I don't understand the ninety. If customers don't verify within the initial 90 days, are they really going to then verify in the next 90 days?

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Misty Velasquez Community Action of Skagit (Guest)

From an agency standpoint, it's going to take close to that to probably get in touch with a lot of these clients. People don't tend to respond quickly when it comes to verifying income, at least in our experience with people, we are scheduling out for appointments right now in June. So, if and they've got from now until June to gather all their documentation that they need for their appointment they're going to come to their appointment and don't even have all of that put together, so it's going to be a lot of work on the agencies part to contact them to work with them to get the documentation that they need. I feel the 90 days is much needed for an agency standpoint.

Tillis, Daniel

Are you talking about the initial 90 days or the additional 90 days?

Misty Velasquez Community Action of Skagit (Guest)

The client applies for the BDR say in October, I would assume would start from November going out 90 days and that's the 90 days that I'm talking about.

Tillis, Daniel

OK. So, we've agreed that we'll go with 90 days from that initial verification timeline that we're talking about right now and Avista is going to if a customer is non respondent during those initial 90 days. If at some point, they contact the agency in the next 90 days after that, so a total of 180 days from when the verification process starts and then they get their income verified, then the agency will provide the company with that information. And depending on when that is in that second 90 days, the company will reinstate the customer into the program, we will issue a credit for any discounts missed.

Misty Velasquez Community Action of Skagit (Guest)

So I want to speak on just on my agencies behalf and I can say that if we're going to do an additional 90 days waiting for the client to contact us, we're not going to close out that after the 1st 90 days and they don't respond in those 90 days. That is going to put a huge burden on my staff withholding files and and

having to monitor those files separately, then the next 90 days because we're going to be getting files every single month.

Tillis, Daniel
Right.

Misty Velasquez Community Action of Skagit (Guest)

It's going to be very chaotic and having customers calling us whenever they feel like. I know my staff would rather close out that file and it's done and over with. And then the person needs to reapply for the BDR somehow and show verification at time of reapplying or something. That's how I would go with my agent knowing that it's going to be a hardship already for us to be keeping track of all of the verifications.

Peter Damrosch

And can I just chime in? Just to support that Misty, I think that sort of matches what we had in mind, which is you know they don't respond within the 90 days their files closed out. The question is if they then reapply within three months do we give them a credit for saying right now they're back on the program with the new application, but they had been removed and they never should have been removed. I don't know that you have to hold the file open. It's maybe a question of what happens if somebody who's now seeing that they're bill has gone back to its original amount.

Misty Velasquez Community Action of Skagit (Guest)

So if they're reapplying after that first initial 90 days and say they have to have an appointment at that point to come in and show verification because we are going to be very busy with verifying other LIHEAP appointments, other PSE help appointments, things like that, I am going to say at that point they're going to need an appointment to verify their income. I don't see a problem giving them a credit for that at that point. If it's within 90 days after that they come in and schedule an appointment and get verified at that point. But they're going to need, for our agency, an appointment to come in. It's not something we're going to be able to do like instantly.

Lorena Shah

Kind of just staying with where Misty's thinking, if we close from an administrative standpoint it's going to be easier to cleanly closeout that 90-day eligibility verification, send that off to the utility to pull them off the rate, and then messaging if you can get back on the rate by verifying information within the time frame. I am also thinking an appointment of some sort would probably be required to do that as well, or that would be the cleanest way to do it. But I do really support and like the idea from a workflow standpoint we can figure that out and we can all agree that these folks will have to contact the agency, have a verification, or have an intake appointment and whatever that might look like for the different agencies. But if we can then agree that if they if we do that, they can get that credit for that time missed. I think that would be a really nice carrot to offer people and would meet that desire to not kick people off who were in fact eligible. I know with BDR it's supposed to be on demand or close to on demand and so does putting people through the you did not respond to the request so we removed you, at that point, either they could go back and do a self-attestation again through the web or through the utility and get back on the rate and not get a credit. At least get back on the rate or they could go this route to verify and get credit. Would that be kind of the two routes at this point? Does that kind of satisfy the regulatory requirement of it being on demand that they would have the choice to do it

quickly through self-attestation, but if they wanted the bonus of the credit they would need to do with this other way?

Tillis, Daniel

I'm struggling with the process of a customer qualifies on demand, we add the discount rate to the account as practice as quickly as possible. Our plan really is to automate that through the portal and its connection to our CC&B system, and then the customer gets selected for verification, and they don't respond and are removed after 120 days of receiving a bill discount rate, then a month later they notice their bill discount rate is gone. They would call the company and our CSR would go through the process to qualify them again, but the CSR's not going to know that they didn't respond to verification attempts, necessarily. We do add notes when we send letters on the account, so we must have a process at the end of 90 days if they don't respond to add a note that says the BDR's removed because the customer didn't respond. And then, a process for our agents to follow a different path in that case - it's complex. It's a risk-free program you get the bill discount rate if you are selected for verification, and you don't respond then the bill discount rate is removed. And if you want it again you can contact the company or the agency to get the bill discount rate added back without having any of the prior credits or discounts removed. If you get selected for random verification again and you must go through that, then you don't keep the bill discount rate. At some point the customer has some responsibility and we're giving them 90 days plus 30 that they don't know about to verify, and I just feel like we continue to take all the responsibility off the customer and the money we're risking here and Chris pointing this out last week, as other ratepayer funds that we're applying to these accounts, the customer is not taking that responsibility to follow the process.

Misty Velasquez Community Action of Skagit (Guest)

I just have a question on something you just said is there going to be a way, once we've done verification, for us to report that verification to you guys?

Tillis, Daniel

I don't know exactly what that is, our goal would be to do it through the assist portal.

Misty Velasquez Community Action of Skagit (Guest)

I was just thinking if there was a comment box client never responded to us wouldn't whoever is doing the BDR application be able to see that?

Tillis, Daniel

Our agents don't access the assist portal. Shannon, our Consumer Specialist could see it but again, we're planning to automate those processes as much as we can to get have the file pulled from the assist portal to be inputted into CC&B, and then the discounts added to the accounts and other notes added to the accounts at the same time. We're trying to avoid a manual view of the accounts as much as we can. Obviously, the CSR's must look at the accounts as they are qualifying a customer so we could put a process in place where they handle that differently. But you know, it's just in the last several weeks we've talked about so many different processes for our CSRs, we have a limited number of resources and unless we're talking about adding head count to fund this program, we need to start really putting these processes under a magnifying glass and saying, do we really need to do those? This feels like a lot to give a customer 180 days essentially risk free to respond to a verification request. Because we're going to get those discounts back from them.

Mickelson, Christopher

So for the agencies I heard you guys' kind of talking that the initial 90 days after that, if there's no response, you're talking about closing that account or those files and then later, have these people come back. How are you viewing later as them starting the whole process over, because this talking about verification, and it sounds like if you do it that way, you're talking about 2 different initiation fees associated to the agencies for this one customer account versus the initiation fee the agencies get and then whatever this verification fee would be.

Lorena Shah

I don't know if we're thinking about it too much from a fee standpoint currently. I'm sure we will get to that conversation later but to the point, potentially talking about both the eligibility verification process and enrollment process when we're outside of those 90 days if we kind of continue down that route that we've kind of been discussing.

Mickelson, Christopher

So in that instance there would be basically the first setup, whatever that fee is then the verification fee and then this posts which I guess for verification, which would really be another initiation, so there's kind of three fees then associated with this one customer during this as Dan pointed out. So not only is this customer getting risk free access to discount our other customers are paying three times the fee associated with this customer.

Lorena Shah

There's three discrete pieces of work.

Mickelson, Christopher

Yeah, I understand, but I'm just saying they first sign up for the program, then they get verified and because they took too long to really get verified, they're signing up again. So, it's 3 distinct processes.

Lorena Shah

Yeah, but we may see them three months later to reenroll. Regardless of whether we do the credit and or keep it open they still have the right to come back in and either apply with the utility or apply with the agency.

Mickelson, Christopher

What would they reenroll for?

Lorena Shah

To get back on the discount rate. In the event somebody does not respond within 90 and we do close them out completely and then they show up in our office three months later we are going to reenroll them.

Peter Damrosch

And just to chime in on that front, I think that's what California has been seeing, which is a lot of people do come in after being removed. You know, the discounts finally removed from their bill, they start feeling the financial hit and then they come back in to reenroll. That's a sequence we'll have to plan for either way.

Mickelson, Christopher

I understand, but that that adds complexity in how we show the Commission what the program cost will be.

Roberts, Andrew (UTC)

I think when we started talking about this timeline with Avista, my first reaction was that it seemed like a long timeline. But then I started thinking about the position that the people who are going to be using this program could find themselves in how you're struggling to make ends meet day-to-day. The stress that an individual who's in that situation alters her thinking and they're focused on how I make it until tomorrow, and what do I do to make it to tomorrow. I think that's a good support for the longer timeline to get those people the opportunity to get the documentation that they need.

Tillis, Daniel

I understand that. To essentially allow a risk-free enrollment if staffs position is that you agree with the additional 90 days, I guess I would want to establish, if we go with it, a process where and Teri if I say something that we just can't do or Shannon, just tell me, after the 90 days has expired and we get notice back from the agencies that the customer has not responded and then we ultimately remove them from the program on 120 days, apply a note on the account that says customers removed from the bill discount rate due to non-response. When our agents see that note that they advise the customer of that and tell them they must contact their local agency to reapply, and then go through the agency to verify income during that reapplication process, and then the agency notifies us. Now that the customer has successfully gone through income verification qualification, we would reinstate them and issue any credits that are necessary rather than our CSR's going through a second self-attestation with a customer who is nonresponsive. I would rather we just see that note and say I see that you were getting the bill discount rate, I see you're removed from the program because we reached out to verify your income and you didn't respond, therefore you need to go to OIC, here's their contact information, they'll take you through the application and income verification process. Once they notify us that you qualify again through income verification then we will reinstate the discount at the appropriate percent or discount or tier level and issue you credit for any of the time that was missed.

Sovak, Teri

Dan, that's I think certainly possible from the CSR side, and I think it kind of goes back to a question that I heard from one of the other participants here where once dropped them to get back on, there needed to be income verification that it wasn't just a perpetual process for self-attestation.

Tillis, Daniel

I think to me that's the only effective process to prevent that loop that you're talking about.

Charlee Thompson

This conversation has come up with Avista, at least maybe PSE also but certainly with Avista like how do we prevent that endless loop of self-attestation? If that's not in the best interest of balancing the program's effectiveness and integrity, and something that came off that like we discussed with Avista was that maybe it's once per program year a customer can self-attest if they get removed from the program and want to get back on and maybe receive up to three months of credit, then they can set up the appointment with their cap and provide that income documentation. But after that they can't self-attest until the next program year has started, so a way to stop the loop but not a way to prevent the accessible benefits of self-attestation.

Tillis, Daniel

That seems reasonable, so let me see if I can state a recommendation and see if we can get consensus or modify it from what I say; if a customer qualifies initially through self-attestation and they are randomly selected to go through the post qualification income verification process and they failed to respond after 90 days, they will be removed from the program after 120 days unless they contact the agency in that last 30 day window to verify their income they will be removed from the program at 120 days and if they contact the agency. If they contact the agent or the company within 180 days from the original date they were selected or date they could receive the 1st letter indicating they were selected for verification, then the company will note the account and advise the customer they must contact their local agency to go through the application process and provide income verification and if they do that within that 180 day window, then the agency notifies us they successfully qualified in the tier, they've verified their income, the company will reinstate the program at the correct percent discount and go back and issue a credit for any time missed from when the customer was removed from the program. So that's the first part I think, and they can only self-attest one time in a program year, which the subsequent qualifications being required to go through the agencies using income verification would prevent the self-attestation from happening more than one time per year. Does anyone have any thoughts on that process?

Mickelson, Christopher

What does one time per year mean? If you self-certify for my understanding, you get on the program, we haven't really decided if it's a one year or two-year period. If we say it's a two-year period, what does one program year mean?

Tillis, Daniel

During a program year say I qualify on October 2nd through self-attestation and then I get removed from the program because I didn't respond to the verification request, I can't qualify through self-attestation again until the following year or after October of the following year, it's the October 1 through September 30th program year. You can only qualify via self-attestation during that period. If you never get selected for income verification, then you just stay qualified for the entire whatever term we decide on.

Charlee Thompson

Even if we do decide on a 2 year or 24 months term program year, in my mind was still October 1 to October 1.

Tillis, Daniel

I can try to document the flow and maybe something we want to try to come to agreement. Peter says it's a good approach.

Misty Velasquez Community Action of Skagit (Guest)

So can I just clarify, would we be closing out after the 1st 90 days at an agency level, right?

Tillis, Daniel

Yes. You'd close that out, advise us the customer didn't respond at 120 days we would remove them from the program and then the rest of that process I went through would be after that period. If they qualified through income verification again, we would reinstate and issue the credits, but must be through income verification through their local agency. I'm not opposed to restarting the term whatever

length we decide on when the customer provides income verification, because I guess technically, they are officially qualifying through income verification and requalifying at that point. And I certainly want to remove any obstacles we can to get customers in the program and retained in the program, but I know that in CC&B we have some challenges with changing these bill discount rate terms and start dates specifically. Would we just remove the bill discount rate and reapply a new one or we just change the end date on the bill discount rate on these accounts? If you need time to think about that and answer it later, that's OK too.

Sovak, Teri

Well, the discounts are picked up by the rate and that will depend on when the account next bills. Typically, we could be back dating of when this one end and when another one begins so that it gets picked up on the next bill type.

Tillis, Daniel

Let me just give you an example to maybe make it easier, at least for me to understand and I'll just go back to the data used earlier when Chris asked this question. Let's say we get this program in place and a customer qualifies on October 2nd, 2023, and then at the beginning of November, they're selected for post income post qualification, income verification. On December 2nd they go to the agency, provide their income. The agency notifies us that they income verified and qualified again that date. And then we want to update the bill discount rate to either last either 12 or 24 months, whatever we decide on from that date instead of from October 2nd. Can we have a clean process that doesn't cause billing incorrect billing for that change to restart? Essentially the bill discount rate?

Sovak, Teri

If we're changing the discount rate, it's going to be on the bills going forward. But then you're wanting it to be 24 months from that period? With what we're doing manually it would impact the automation. I'm sure if we get to the point where we wanted to automate it.

Tillis, Daniel

So that that part would have to be a manual process, but we could do it. Is that what you're saying?

Sovak, Teri

Yeah.

Tillis, Daniel

OK. I'm OK with starting the term or restarting it when the customer income verifies, it just makes sense to me even though I don't like the idea of it being manual, but they would be like getting some other type of assistance later. I feel like we need to just restart it then if the customer income verifies.

Lorena Shah

I agree. That's great to hear and appreciate recognizing it is likely to be a manual process. I'm very appreciative.

Tillis, Daniel

Alright, we're going to go with that. Thanks Charlee, we're consistent with PSE there and I think that's consistent with the Avista as well. I'm going to move this one up and ask that we talk about it now. We keep stepping around it - one year versus 2-year term and I think we need to decide. It sounds like PSE is going with one year term because they're keeping PSE help and it aligns with that term or that

qualification period and then Avista is going with a 2-year term, 24-month term. We have a two-year term in Oregon. We've been talking about two years all along, I still like 2 years. I just think a customer can qualify and you'll not worry about it for 24 months. And if they need, they can get AMP the next year, then qualify again for 24 months. If they get LIHEAP, then make sure they get they qualify again for 24 months. I don't feel like in this initial period as we're implementing a new program and I don't see any value in 12 months. It will add to our verification pool and add to that work. If we just go with 12 months because you're going to be getting customers requalifying more regularly, I think that's a negative for the customer and for everybody involved in doing that work; the agencies and the company with all these things we just talked through so I'm a big fan of two years versus 12 months. Any objections to starting with 24 months? No...ok. The termination from program letter should address the reason, such as they were found to be ineligible, or they were nonresponsive. I don't see any issue with that. I think we'll align with Avista approach on the termination letter content. As you all learn more about exactly what it might include, feel free to share it and we can reach out to Anna and others. Obviously, we would tell the customer they were terminated either because they didn't qualify, or they did not respond to the request for verification and to contact the company or their agency if they feel differently.

Charlee Thompson

I agree. I like Avista's proposal and then the only thing from Avista that I think they've maybe changed, since these slides, was the termination. I think they're planning not to use that and maybe just saying program removal.

Tillis, Daniel

We can find the right verbiage for that before we do it, and I only added as much as possible in here because I put Avista and PSE. For sure it would include the reason for termination and any actions they can take to be considered for reinstatement or whatever the right verbiage is there. I don't know that we can get through any of the rest of these, so I wanted to maybe learn a little bit more about verification income communication. The alternate methods as far as the agencies already having information to verify customer or medically fragile and how that data would be provided; I I don't think there was a ton of detail in the discussion last week that I read.

Charlee Thompson

Still need to have the discussion on medically fragile customers and what that means in this case. And then I was also going to ask Lorena to speak about agency data and information.

Lorena Shah

I can't speak to the medically fragile too much, but as far as alternative documentation, I think the idea here was that in the event of a non-respondent, or maybe it's a specific type of non-respondent, sometimes agencies can access other program data that requires income eligibility of some sort like for instance rental assistance. That would have income relevant income information documented in it to use if a client is nonresponsive. This is going to vary, though I'm guessing quite a bit among agencies depending on how agency firewalls where information is set up and specifically like which programs they're running, some have strict data sharing requirements, other ones are a little bit looser. It potentially could vary quite a bit as to how agencies are able to complete that, but that was the thinking around that. And then I think with medically fragile was just generally like still providing a benefit if somebody needed heat.

Tillis, Daniel

The rental assistance application examples is A is a good example for the agent. The data you all might already have. For medically fragile one way I thought about it is you know we have customers who have medical certificates that allow some additional protections related to disconnects for non-pay as an example, and so we could exclude any customer who has a medical certificate on file with Cascade to be excluded from the random sample for income verification. I guess that could go against the approach of saying that nothing else is considered in the random sample but it's an option. Otherwise, we'll just have to talk through what else that means. I just don't know anything else about how we might handle that so some food for thought there on an option. And if a customer is medically fragile, it would be ideal if they had a medical certificate on file with the company so that we could afford them those additional protections. Now on to the rental assistance application, have you all had any conversations with Avista or PSE on categorical eligibility for the bill discount rate program?

Charlee Thompson

We have, for the first year LIHEAP eligibility feeds into his program, but I think for all other programs that might be related to rental assistance, the various types that are offered throughout the state that the agencies can be better too. That was more on the table for discussion in year 2.

Lorena Shah

That sounds right to me. And seeing with categorical, we just kind of agreed that we couldn't quite figure that for the first year but that we'd like the idea of some level of categorical eligibility. I'd be comfortable with your proposal though Dan about those that have a medical certification and exempting them from eligibility so that I think bears more conversation.

Charlee Thompson

Kind of on a similar note, to medically fragile, but going back to a slightly earlier point, maybe we can also make space in next week's meeting to talk about enrollment terms for customers on fixed incomes. I forget if we brought that up here before, so whether that's two years or three years or four years, some sort of extended term.

Tillis, Daniel

OK, that just made my head hurt.

Charlee Thompson

Lots of details, I forgot about that one.

2. Income collection as part of Bill discount qualification process (if time permits) – Dan Tillis
3. Maximizing Federal Funding (if time permits) – Dan Tillis
4. Set key topic(s) for next meeting – Dan Tillis

Tillis, Daniel

That's the first I've heard that come up, I don't have any thoughts or opinion on it right now. Since

we only have 4 minutes left, let's talk about our agenda for next week. I think we were supposed to use next week's meeting to discuss the community-based organization program and finalize those details and try to get started soon on that program for the five agencies who wanted to be involved. So, I guess we'd really be talking about picking this topic back up on April 26th instead of the 19th. So that's a good reminder that next week's meeting would be all about CBO stuff. And I can put together an agenda for that, it will be a brief agenda, but maybe some specific topics for around the CBO program development. There are a few items for verification process and then we have the enrollment terms for customers on fixed income. We can keep income collection and maximizing federal funding on there if time permits. If everyone's OK with that because we need to get to those topics soon. Another great discussion with some agreements, so continue to make progress. If anybody has anything that can't wait until next week, just send via e-mail or reach out and we can talk then. One big ask for next week; if you're one of the five agencies who is participating, make sure someone attends. Give a lot of thought to how we want to finalize the CBO program that we were required to implement and want to implement this year and when we could get started on that. Have a great rest of your day.



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April 20, 2023

Ms. Amanda Maxwell
Executive Director and Secretary
Washington Utilities & Transportation Commission
621 Woodland Square Loop SE
Lacey, WA 98503

Regarding: UG-210755 Compliance Filing to Commission Request for Updates to Advisory Group Pursuant to Order 09

Dear Ms. Maxwell:

In compliance with Paragraph No. 78 of Order 09 in Docket No. UG-210755, Cascade Natural Gas Corporation ("Cascade") encloses for filing the WEAf advisory meeting minutes. The following documents are submitted electronically as part of this filing:

- UG-210755-WEAF-Agenda-04-20-2023.pdf

If you have any questions, please contact me at 509.734.4549.

Sincerely,

Christopher Mickelson

Christopher Mickelson
Manager, Regulatory Affairs
Cascade Natural Gas Corporation
8113 W. Grandridge Blvd.
Kennewick, WA 99336
Christopher.Mickelson@cngc.com

Attachment

WEAF Advisory Group

Agenda

April 12, 2023

KEY TOPICS: *Post-qualification verification process, income collection as part of qualification process*

GOALS FOR MEETING OUTCOME: *Outline all components of the post-qualification income verification process, finalize income collection process, begin discussion on maximizing federal funds (if time permits)*

Agreements during the 4/12/23 Meeting

Income verification process:

- Customers may only qualify via self-attestation once per program year (Oct 1 – Sep 30).
- Customers will have 90 days after randomly selected to contact agencies to verify income.
- If the customer is non-responsive the agencies will notify the company and Cascade will remove the discount after 120 days. The company will notate the account to reflect removal of the discount. The additional 30 days is an administrative buffer that will not be communicated to customers.
- If a customer is removed from the BDR program and then contacts the company within 180 days of being selected for income verification (within 90 days after initial 90-day verification timeframe), the company's employees will advise the customer they were removed due to not responding to income verification requests. The company will then refer the customer to the appropriate agency to go through qualification via income verification. Agencies will notify the company when customers requalify via income verification. The company will then restart the BDR at the appropriate tier and issue a credit for any discounts missed since being removed from the program.
- Agencies will close out income verification requests/cases after the initial 90-day period. This will include the disposition – e.g., income qualified, not income qualified, qualified at new tier, no response, etc.
- The intent is to use Cascade's Assist Portal for the post qualification income verification process.

Term Length – we agreed the term length will be 24 months. The EDP term will restart when a customer successfully completes the agency income verification process.

Alternate methods for verifying non-responsive individuals – agreed agencies can utilize other income/FPL/AMI data they have to income verify BDR eligibility – e.g., from a rental assistance application.

1. Post-Qualification Verification process – Dan Tillis

From Avista:

Verification What we've agreed upon	
Verification	Intent to verify the program is engaging the intended population and providing the appropriate level of benefit
	<ul style="list-style-type: none">▪ Completely random selected pulled from the previous month's enrollments and no use of probability characteristics for identifying customers for verification because of the potential of the perception of bias (e.g., high energy users, high discount percentage)▪ 6% of the total enrollment pool for random selection. Those who have been verified will be captured in the verified percentage amount but will not be required to complete verification
	The agencies support the monthly verification with a 90-day completion window once the process is started
	The terminated from the program letter should: <ul style="list-style-type: none">▪ address the reason with detail around the customer situation, such as:▪ terminated because they were found to be ineligible are informed to contact their local CAA if their household situation changes▪ non-respondents can contact their local CAA to complete the verification process to be re-enrolled into the program, if qualified

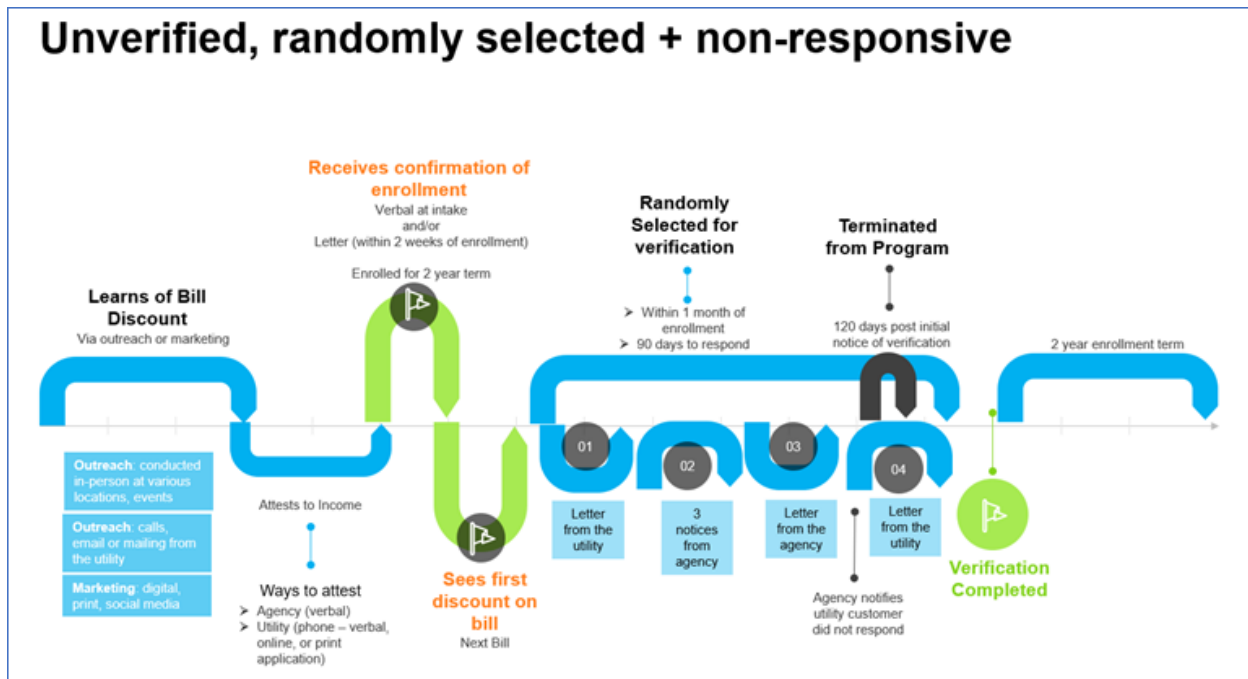
Verification What we've agreed upon, continued

Verification

- Randomly selected participants will be notified there is 90-day timeline to complete the verification. If they do not respond within the 90-day window they will be terminated from the program.
 - If the participant does not complete verification, they will be terminated at 120-day point
- Randomly selected participants who have been terminated for non-response, and complete verification within 90 days post termination will receive a credit for the months they were not enrolled in the program
 - the credits should be specific for 1, 2 or 3 months and by income tier
- Non-responsive individuals may be verified by either of the following methods for continued participation in the program:
 - agency verification based on data
 - customer is identified as medically fragile (term to be defined; with consideration for WAC 480-100-128(8) that discusses medical emergencies)
- The verification notices/reminders from the agencies should be in the customer's preferred contact method, where possible (e.g., phone call, text, email or letter)
- The number of touches is sufficient (i.e., 2 letters from utility, 3 notices/reminders in customer preferred method for contact, and 1 letter from the agency).
- The 2-year term starts from the date of verification

WAC 480-100-128

Unverified, randomly selected + non-responsive



Tillis, Daniel

We had a very, very productive meeting last week. Lots of important decisions and hopefully we can continue some of that this week. I had to drop 30 minutes early last week, but I did read through the minutes, so I'm up to speed on a lot. What I pulled out of the minutes for discussion was continuing the post qualification verification process discussion and we still have income collection as part of the bill discount qualification process, as well as maximizing federal funding, both of those as next topics if time

permits. There was a lot of discussion about whether we should have the EDP, the bill discount rate last one year or two years, the collection process as part of the upfront qualification, and maximizing federal funding that we want to continue, does everyone agree with that?

Peter Damrosch

Yes, it sounds great.

Tillis, Daniel

Just a quick review of what we agreed to last week for the tiers and the percent discount, Tier 1-20% FPL, max 4% AMI, Tier 2 - 50% and 12%, Tier 3, 100% and 24%, Tier 4 - 50% and 36%, and then Tier 5 - 200% and 80% as max FPL and AMI, then discounts of 90%, 71%, 40%, 15% and 8% for those tiers. For the auto enrollment process, it wasn't on the agenda, but we took care of it anyways and this is what I collected as far as how we'll auto enroll customers and effective with the October 1, 2023, program start date, with the new bill discount rate and AMP hopefully in place by then. We'll pull all WEAFA, and Winter Help pledges from the prior program year, so October 1, 2022, to September 30th, 2023, from Cascade's Assist Portal. We'll utilize FPL and AMI data that is provided by the agencies and uploaded into the portal to auto enroll those customers into the correct tier. We'll then also pull all LIHEAP pledges from the assist portal that were submitted by the agencies, send those back to the agencies for them to use the calculator to add FPL and SMI and or FPL or AMI on to whatever format we provide those customer accounts and send them back to the company and then we'll utilize that data to also enroll those customers into the correct tier. If for some reason we're not able to get FPL and AMI for LIHEAP only qualified customers, then we'll auto enroll those customers into Tier 4 since we know that customer's FPL is no greater than 150% since they qualified for LIHEAP. We'll send all those customers who are auto enrolled letters advising what we've done and to contact the company if they have any questions or concerns or feel they should qualify for a different discount level. Any questions or feedback on that? Alright, hearing nothing, I'm going to assume I got it right. That took us to the rest of the discussion for last week's meeting which was all about the post qualification income verification process, and we got 4 agreements and then lots of great discussion after that. And so those agreements were that we would do a monthly random selection of 5% of customers who qualified via self-attestation, customers who qualify with verified income documentation would not be in the pool of the 5% random selections. We'll attempt to do that selection by county to attempt to evenly distribute the accounts across the agencies based on customer account within the counties and agency size of course. Bigger agencies would have a greater selection, random selection pool and therefore would get more accounts to verify, but it would be proportionate to the agency size and the county size. Selected customers for the random sample will be provided to the agencies at the beginning of each month for income verification. Our goal is to use our assist portal to provide the accounts for verification. We don't know what all work will be required to do that yet, so we'll need to figure that out. And if we can't have that done by November, which would be our first random sample, then we would need to figure out an alternate method. We agreed that the window after the random sample is pulled would be 90 days for the agencies to then verify income for the selected customers. And then there was, of course a lot of discussion about some of the other points, but I think that's as far as we got as far as agreements go. Anything I missed or misrepresented? I want to pull the Avista slides back into this just for discussion purposes to have all on one view. They've shared this with the stakeholder group they're working with on establishing their bill discount rate and including the post qualification income verification process. I think we've covered a lot of this, certainly the top half of this part where we've all agreed to the components that are in that

section, we haven't talked about what should be in the terminated from the program letter yet, so we need to talk about that still and then we haven't made decisions on the 120 days versus 90, the 30 day window as a grace period where the customer's not quite removed from the program yet. I also think on that second Avista slide we still need to discuss the provisions for protecting or helping customers that don't respond that likely still qualify, which is some of those points, like Avista's proposal to give a credit to customers who after their 90 day window is up if they come back in and complete the verification process, they'll receive credit for the month that they weren't enrolled in the program.

Tillis, Daniel

We need to talk about preferred contact method because we have some issues there. Let's start on the 90 versus 120 days for the verification of income. To recap, what Charlee just shared, what we shared with the customer would be 90 days, that's the time frame they have, but we wouldn't remove them from the program until 120 days just to give time in case there's still work being done by the agencies or some other delay which would prevent us from removing the customer and then potentially having to add them back, which is the risk if we don't do that for the company, is that there's work to get them back on the program. Does anybody have any insight into how PSE is treating them?

Charlee Thompson

I think PSE is still working through how they're going to handle nonrespondents. Right now, the only thing they've decided is at some point customers who don't respond will be removed from the program, but then what extra precautions and provisions are around that hasn't been discussed yet, but if someone else who's working with Avista knows something that I don't, feel free to jump in.

Tillis, Daniel

We haven't had a chance to meet internally but I'm going to give you my opinion. I don't have any issues with starting with the approach that Avista is using simply because you know we can always change it if we feel like it's failing. For some reason we're six months into our program in Oregon and we don't have a verification process in place there yet. I think we're getting very close, but it was one of those things that we were able to start there without working out every detail because under the law, it's a temporary program that must become permanent at some point. Allowing that extra 30-day grace period I'm OK with starting that way and seeing how it goes. Anybody have any objections to that? No. OK. If customer is non respondent and the 90-day period is up, then removed at 120 days, does the clock for the additional 90 days start after the initial 90 days or does it start after the 120 days for reinstatement and the credits.

Charlee Thompson

I think it starts after the 90 so that extra 30 leads up to the 120 is behind the scenes that the customer is on but hasn't been advertised so then they have the three months or the extra 90 days to come back and get that back credit for that was my understanding anyway. So, to the customer, they have the full 90 days or three months from the start of being notified that they should come into an agency and show proof of program eligibility. Behind the scenes from the utility and agency systems perspective, that customer who might not have responded won't be removed from the program until 120 days is advertised to the customer that they have 90 days. But from the systems perspective, the customer gets their full 90-day opportunity to remain on the benefit program and also to respond, an extra month behind the scenes is happening so that the agency and the utility can do that work to remove the customer from the program.

Tillis, Daniel

So it's 180 days after the randomly selected basically, or their first outreach after they're randomly selected.

Charlee Thompson

Yes.

Tillis, Daniel

OK. How would they operationalize monitoring that and getting credits issued? I'm thinking that would have to be a manual process. I know some of the concerns shared last week is that we're essentially giving four months of a discount to a customer who may be non-responsive and we're not pulling any of that money back because it's a risk-free program, which I think that Cascade's comfortable with. And then a customer could be given 180 days to verify and then we're doing a lot of work to pull them out of the program and put them back in with credits back dated to when we started the outreach to get them to respond.

Peter Damrosch

I work with Yochi and the energy project for people I haven't met been involved in the Avista and Northwest Natural parallel processes, but not on Cascade's. It's nice to join you all. I'm not sure if you talked about this last week, but some of the background motivation for this proposal is coming out of seeing what's been happening in California, where they've been seeing a lot of people don't respond to what they called post enrollment verification. And then later, you get back on the program realizing that they were always eligible, and something came up that month or they didn't get the notice. I think the perspective for this option is recognizing that these are people who should have always been on the program, something happened, and they were removed, but they were always eligible - it would be great to sort of treat them that way. There are some implementation steps and of course we'll defer to you on whether you think it's something you could automate or do manually. Think of the automated world you would check to see if somebody who's been added to the program was removed for nonresponse and are they reenrolling within 90 days of when they were removed and then you could apply a broad looking credit. The system is much better in terms of whether that's doable from a more automated or semi-automated perspective.

Tillis, Daniel

That makes sense. I appreciate that it's being based on what's being seen in California, so we have some information from experience with it anyways. I understand that they would have been qualified the whole time had they responded, I also see the side we're planning to tell customers when they do qualify that they may be selected for a post qualification verification process. A lot of the discussion last week was that Avista is going to start the term over when a customer goes through verification, and so it'd be another 12 or 24 months, depending on what we decide on. So, a customer who gets reenrolled, calls five months into the verification process would essentially be getting a 29-month term basically, which isn't the end of the world, but they're getting something that the non-verified customers aren't getting. In that case, I don't know if staff has an opinion on if that's treating customers differently. I guess if you're selecting them for post enrollment verification, you're treating them differently as well. So, I may have just answered my own question, but I don't have a strong opinion either way. I think it's going to be difficult for us to operationalize and that makes me a little resistant. But I don't want to just

be resistant because it's difficult to operationalize so Teri, you're on and you'll be helping operationalize a lot of this; what are your thoughts?

Sovak, Teri

It's hard to say. We just have the little bit of experience that we have with the one program so far and a lot of that has been manual to start, so I know what we can do at the beginning and what we can do down the road might be a couple of different things, but I anticipate that you know much of it will be manual to start.

Tillis, Daniel

Chris has mentioned in the past that we try to align with Avista because we have a lot of overlap with them and I'm trying my best to keep us as close to this as we can. Understanding we're not the same, in a lot of ways, I guess this is one we could attempt to try to do in the same way they do and if it's not working, we'll adjust. Ninety days feels like a long time. Any thoughts on making these 60 days, almost half a year versus the be five months instead of six months, essentially that they'd have from when we initially started reaching out because I don't understand the ninety. If customers don't verify within the initial 90 days, are they really going to then verify in the next 90 days?

Misty Velasquez Community Action of Skagit From an agency standpoint, it's going to take close to that to probably get in touch with a lot of these clients. People don't tend to respond quickly when it comes to verifying income, at least in our experience with people, we are scheduling out for appointments right now in June. So, if they've got from now until June to gather all their documentation that they need for their appointment they're going to come to their appointment and don't even have all of that put together, so it's going to be a lot of work on the agencies part to contact them to work with them to get the documentation that they need. I feel the 90 days is much needed for an agency standpoint.

Tillis, Daniel

Are you talking about the initial 90 days or the additional 90 days?

Misty Velasquez Community Action of Skagit The client applies for the BDR say in October, I would assume would start from November going out 90 days and that's the 90 days that I'm talking about.

Tillis, Daniel

OK. So, we've agreed that we'll go with 90 days from that initial verification timeline that we're talking about right now and Avista is going to if a customer is non respondent during those initial 90 days. If at some point, they contact the agency in the next 90 days after that, so a total of 180 days from when the verification process starts and then they get their income verified, then the agency will provide the company with that information. And depending on when that is in that second 90 days, the company will reinstate the customer into the program, we will issue a credit for any discounts missed.

Misty Velasquez Community Action of Skagit

So I want to speak on just on my agencies behalf and I can say that if we're going to do an additional 90 days waiting for the client to contact us, we're not going to close out that after the 1st 90 days and they don't respond in those 90 days. That is going to put a huge burden on my staff withholding files and having to monitor those files separately, then the next 90 days because we're going to be getting files every single month.

Tillis, Daniel
Right.

Misty Velasquez Community Action of Skagit

It's going to be very chaotic and having customers calling us whenever they feel like. I know my staff would rather close out that file and it's done and over with. And then the person needs to reapply for the BDR somehow and show verification at time of reapplying or something. That's how I would go with my agency knowing that it's going to be a hardship already for us to be keeping track of all of the verifications.

Peter Damrosch

And can I just chime in? Just to support that Misty, I think that sort of matches what we had in mind, which is you know they don't respond within the 90 days their files closed out. The question is if they then reapply within three months do we give them a credit for saying right now they're back on the program with the new application, but they had been removed and they never should have been removed. I don't know that you have to hold the file open. It's maybe a question of what happens if somebody who's now seeing that they're bill has gone back to its original amount.

Misty Velasquez Community Action of Skagit

So if they're reapplying after that first initial 90 days and say they have to have an appointment at that point to come in and show verification because we are going to be very busy with verifying other LIHEAP appointments, other PSE help appointments, things like that, I am going to say at that point they're going to need an appointment to verify their income. I don't see a problem giving them a credit for that at that point. If it's within 90 days after that they come in and schedule an appointment and get verified at that point. But they're going to need, for our agency, an appointment to come in. It's not something we're going to be able to do like instantly.

Lorena Shah

Kind of just staying with where Misty's thinking, if we close from an administrative standpoint it's going to be easier to cleanly close out that 90-day eligibility verification, send that off to the utility to pull them off the rate, and then messaging if you can get back on the rate by verifying information within the time frame. I am also thinking an appointment of some sort would probably be required to do that as well, or that would be the cleanest way to do it. But I do really support and like the idea from a workflow standpoint we can figure that out and we can all agree that these folks will have to contact the agency, have a verification, or have an intake appointment and whatever that might look like for the different agencies. But if we can then agree that if they do that, they can get that credit for that time missed. I think that would be a really nice carrot to offer people and would meet that desire to not kick people off who were in fact eligible. I know with BDR it's supposed to be on demand or close to on demand and so does putting people through the you did not respond to the request so we removed you, at that point, either they could go back and do a self-attestation again through the web or through the utility and get back on the rate and not get a credit. At least get back on the rate or they could go this route to verify and get credit. Would that be kind of the two routes at this point? Does that kind of satisfy the regulatory requirement of it being on demand that they would have the choice to do it quickly through self-attestation, but if they wanted the bonus of the credit they would need to do it this other way?

Tillis, Daniel

I'm struggling with the process of a customer qualifies on demand, we add the discount rate to the account as quickly as possible. Our plan really is to automate that through the portal and its connection to our CC&B system, and then the customer gets selected for verification, and they don't respond and are removed after 120 days of receiving a bill discount rate, then a month later they notice their bill discount rate is gone. They would call the company and our CSR would go through the process to qualify them again, but the CSR's not going to know that they didn't respond to verification attempts, necessarily. We do add notes when we send letters on the account, so we must have a process at the end of 90 days if they don't respond to add a note that says the BDR's removed because the customer didn't respond. And then, a process for our agents to follow a different path in that case - it's complex. It's a risk-free program you get the bill discount rate if you are selected for verification, and you don't respond then the bill discount rate is removed. And if you want it again you can contact the company or the agency to get the bill discount rate added back without having any of the prior credits or discounts removed. If you get selected for random verification again and you must go through that, then you don't keep the bill discount rate. At some point the customer has some responsibility and we're giving them 90 days plus 30 that they don't know about to verify, and I just feel like we continue to take all the responsibility off the customer and the money we're risking here and Chris pointing this out last week, as other ratepayer funds that we're applying to these accounts, the customer is not taking that responsibility to follow the process.

Misty Velasquez Community Action of Skagitl just have a question on something you just said is there going to be a way, once we've done verification, for us to report that verification to you guys?

Tillis, Daniel

I don't know exactly what that is, our goal would be to do it through the assist portal.

Misty Velasquez Community Action of Skagit

I was just thinking if there was a comment box client never responded to us wouldn't whoever is doing the BDR application be able to see that?

Tillis, Daniel

Our agents don't access the assist portal. Shannon, our Consumer Specialist could see it but again, we're planning to automate those processes as much as we can to have the file pulled from the assist portal to be inputted into CC&B, and then the discounts added to the accounts and other notes added to the accounts at the same time. We're trying to avoid a manual view of the accounts as much as we can. Obviously, the CSRs must look at the accounts as they are qualifying a customer so we could put a process in place where they handle that differently. But you know, it's just in the last several weeks we've talked about so many different processes for our CSRs, we have a limited number of resources and unless we're talking about adding head count to fund this program, we need to start really putting these processes under a magnifying glass and saying, do we really need to do those? This feels like a lot to give a customer 180 days essentially risk free to respond to a verification request. Because we're going to get those discounts back from them.

Mickelson, Christopher

So for the agencies I heard you guys' kind of talking that the initial 90 days after that, if there's no response, you're talking about closing that account or those files and then later, have these people come back. How are you viewing later as them starting the whole process over, because this talking

about verification, and it sounds like if you do it that way, you're talking about 2 different initiation fees associated to the agencies for this one customer account versus the initiation fee the agencies get and then whatever this verification fee would be.

Lorena Shah

I don't know if we're thinking about it too much from a fee standpoint currently. I'm sure we will get to that conversation later but to the point, potentially talking about both the eligibility verification process and enrollment process when we're outside of those 90 days if we kind of continue down that route that we've kind of been discussing.

Mickelson, Christopher

So in that instance there would be basically the first setup, whatever that fee is then the verification fee and then this posts which I guess for verification, which would really be another initiation, so there's kind of three fees then associated with this one customer during this as Dan pointed out. So not only is this customer getting risk free access to discount our other customers are paying three times the fee associated with this customer.

Lorena Shah

There's three discrete pieces of work.

Mickelson, Christopher

Yeah, I understand, but I'm just saying they first sign up for the program, then they get verified and because they took too long to really get verified, they're signing up again. So, it's 3 distinct processes.

Lorena Shah

Yeah, but we may see them three months later to reenroll. Regardless of whether we do the credit and or keep it open they still have the right to come back in and either apply with the utility or apply with the agency.

Mickelson, Christopher

What would they reenroll for?

Lorena Shah

To get back on the discount rate. In the event somebody does not respond within 90 and we do close them out completely and then they show up in our office three months later we are going to reenroll them.

Peter Damrosch

And just to chime in on that front, I think that's what California has been seeing, which is a lot of people do come in after being removed. You know, the discounts finally removed from their bill, they start feeling the financial hit and then they come back in to reenroll. That's a sequence we'll have to plan for either way.

Mickelson, Christopher

I understand, but that that adds complexity in how we show the Commission what the program cost will be.

Roberts, Andrew (UTC)

I think when we started talking about this timeline with Avista, my first reaction was that it seemed like

a long timeline. But then I started thinking about the position that the people who are going to be using this program could find themselves in how you're struggling to make ends meet day-to-day. The stress that an individual who's in that situation alters her thinking and they're focused on how I make it until tomorrow, and what do I do to make it to tomorrow. I think that's a good support for the longer timeline to get those people the opportunity to get the documentation that they need.

Tillis, Daniel

I understand that. To essentially allow a risk-free enrollment if staff's position is that you agree with the additional 90 days, I guess I would want to establish, if we go with it, a process where, and Teri if I say something that we just can't do or Shannon, just tell me, after the 90 days has expired and we get notice back from the agencies that the customer has not responded and then we ultimately remove them from the program after 120 days, apply a note on the account that says customer's removed from the bill discount rate due to non-response. When our agents see that note that they advise the customer of that and tell them they must contact their local agency to reapply, and then go through the agency to verify income during that reapplication process, and then the agency notifies us. Now that the customer has successfully gone through income verification qualification, we would reinstate them and issue any credits that are necessary rather than our CSRs going through a second self-attestation with a customer who is nonresponsive. I would rather we just see that note and say I see that you were getting the bill discount rate, I see you were removed from the program because we reached out to verify your income and you didn't respond, therefore you need to go to OIC, here's their contact information, they'll take you through the application and income verification process. Once they notify us that you qualify again through income verification then we will reinstate the discount at the appropriate percent or discount or tier level and issue you credit for any of the time that was missed.

Sovak, Teri

Dan, that's I think certainly possible from the CSR side, and I think it kind of goes back to a question that I heard from one of the other participants here where once dropped them to get back on, there needed to be income verification that it wasn't just a perpetual process for self-attestation.

Tillis, Daniel

I think to me that's the only effective process to prevent that loop that you're talking about.

Charlee Thompson

This conversation has come up with Avista, at least, maybe PSE also, but certainly with Avista like how do we prevent that endless loop of self-attestation? If that's not in the best interest of balancing the program's effectiveness and integrity, and something that came off that like we discussed with Avista was that maybe it's once per program year a customer can self-attest. If they get removed from the program and want to get back on and maybe receive up to three months of credit, then they can set up the appointment with their CAP and provide that income documentation. But after that they can't self-attest until the next program year has started, so a way to stop the loop but not a way to prevent the accessible benefits of self-attestation.

Tillis, Daniel

That seems reasonable, so let me see if I can state a recommendation and see if we can get consensus or modify it from what I say; if a customer qualifies initially through self-attestation and they are randomly selected to go through the post qualification income verification process and they failed to respond after 90 days, they will be removed from the program after 120 days unless they contact the

agency in that last 30 day window to verify their income they will be removed from the program at 120 days. If they contact the agency or the company within 180 days from the original date they were selected or date they receive the 1st letter indicating they were selected for verification, then the company will note the account and advise the customer they must contact their local agency to go through the application process and provide income verification and if they do that within that 180 day window, then the agency notifies us they successfully qualified in the tier, they've verified their income, the company will reinstate the program at the correct percent discount and go back and issue a credit for any time missed from when the customer was removed from the program. So that's the first part I think, and they can only self-attest one time in a program year, which the subsequent qualifications being required to go through the agencies using income verification would prevent the self-attestation from happening more than one time per year. Does anyone have any thoughts on that process?

Mickelson, Christopher

What does one time per year mean? If you self-certify for my understanding, you get on the program, we haven't really decided if it's a one year or two-year period. If we say it's a two-year period, what does one program year mean?

Tillis, Daniel

During a program year say I qualify on October 2nd through self-attestation and then I get removed from the program because I didn't respond to the verification request, I can't qualify through self-attestation again until the following year or after October of the following year, it's the October 1 through September 30th program year. You can only qualify via self-attestation during that period. If you never get selected for income verification, then you just stay qualified for the entire whatever term we decide on.

Charlee Thompson

Even if we do decide on a 2 year or 24 months term program year, in my mind was still October 1 to October 1.

Tillis, Daniel

I can try to document the flow and maybe something we want to try to come to agreement. Peter says it's a good approach.

Misty Velasquez Community Action of Skagit

So can I just clarify, would we be closing out after the 1st 90 days at an agency level, right?

Tillis, Daniel

Yes. You'd close that out, advise us the customer didn't respond at 120 days we would remove them from the program and then the rest of that process I went through would be after that period. If they qualified through income verification again, we would reinstate and issue the credits, but must be through income verification through their local agency. I'm not opposed to restarting the term whatever length we decide on when the customer provides income verification, because I guess technically, they are officially qualifying through income verification and requalifying at that point. And I certainly want to remove any obstacles we can to get customers in the program and retained in the program, but I know that in CC&B we have some challenges with changing these bill discount rate terms and start dates specifically. Would we just remove the bill discount rate and reapply a new one or we just change the

end date on the bill discount rate on these accounts? If you need time to think about that and answer it later, that's OK too.

Sovak, Teri

Well, the discounts are picked up by the rate and that will depend on when the account next bills. Typically, we could be back dating of when this one end and when another one begins so that it gets picked up on the next bill type.

Tillis, Daniel

Let me just give you an example to maybe make it easier, at least for me to understand and I'll just go back to the data used earlier when Chris asked this question. Let's say we get this program in place and a customer qualifies on October 2nd, 2023, and then at the beginning of November, they're selected for post qualification income verification. On December 2nd they go to the agency, provide their income. The agency notifies us that they income verified and qualified again that date. And then we want to update the bill discount rate to either last either 12 or 24 months, whatever we decide on from that date instead of from October 2nd. Can we have a clean process that doesn't cause incorrect billing for that change to restart? Essentially the bill discount rate?

Sovak, Teri

If we're changing the discount rate, it's going to be on the bills going forward. But then you're wanting it to be 24 months from that period? With what we're doing manually it would impact the automation. I'm sure if we get to the point where we wanted to automate it.

Tillis, Daniel

So that that part would have to be a manual process, but we could do it. Is that what you're saying?

Sovak, Teri

Yeah.

Tillis, Daniel

OK. I'm OK with starting the term or restarting it when the customer income verifies, it just makes sense to me even though I don't like the idea of it being manual, but that would be like getting some other type of assistance later. I feel like we need to just restart it then if the customer income verifies.

Lorena Shah

I agree. That's great to hear and appreciate recognizing it is likely to be a manual process. I'm very appreciative.

Tillis, Daniel

Alright, we're going to go with that. Thanks Charlee, we're consistent with PSE there and I think that's consistent with the Avista as well. I'm going to move this one up and ask that we talk about it now. We keep stepping around it - one year versus 2-year term and I think we need to decide. It sounds like PSE is going with one year term because they're keeping PSE help and it aligns with that term or that qualification period and then Avista is going with a 2-year term, 24-month term. We have a two-year term in Oregon. We've been talking about two years all along, I still like 2 years. I just think a customer can qualify and you'll not worry about it for 24 months. And if they need, they can get AMP the next year, then qualify again for 24 months. If they get LIHEAP, then make sure they qualify again for 24 months. I don't feel like in this initial period as we're implementing a new program and I don't see any

value in 12 months. It will add to our verification pool and add to that work. If we just go with 12 months because you're going to be getting customers requalifying more regularly, I think that's a negative for the customer and for everybody involved in doing that work; the agencies and the company with all these things we just talked through so I'm a big fan of two years versus 12 months. Any objections to starting with 24 months? No...ok. The termination from program letter should address the reason, such as they were found to be ineligible, or they were nonresponsive. I don't see any issue with that. I think we'll align with Avista approach on the termination letter content. As you all learn more about exactly what it might include, feel free to share it and we can reach out to Anna and others. Obviously, we would tell the customer they were terminated either because they didn't qualify, or they did not respond to the request for verification and to contact the company or their agency if they feel differently.

Charlee Thompson

I agree. I like Avista's proposal and then the only thing from Avista that I think they've maybe changed, since these slides, was the termination. I think they're planning not to use that and maybe just saying program removal.

Tillis, Daniel

We can find the right verbiage for that before we do it, and I only added as much as possible in here because I put Avista and PSE. For sure it would include the reason for termination and any actions they can take to be considered for reinstatement or whatever the right verbiage is there. I don't know that we can get through any of the rest of these, so I wanted to maybe learn a little bit more about income verification via alternate methods as far as the agencies already having information to verify customer or medically fragile and how that data would be provided; I don't think there was a ton of detail in the discussion last week that I read.

Charlee Thompson

Still need to have the discussion on medically fragile customers and what that means in this case. And then I was also going to ask Lorena to speak about agency data and information.

Lorena Shah

I can't speak to the medically fragile too much, but as far as alternative documentation, I think the idea here was that in the event of a non-respondent, or maybe it's a specific type of non-respondent, sometimes agencies can access other program data that requires income eligibility of some sort like, for instance, rental assistance. That would have income relevant income information documented in it to use if a client is nonresponsive. This is going to vary, though I'm guessing, quite a bit among agencies depending on how agency firewalls where information is set up and specifically like which programs they're running, some have strict data sharing requirements, other ones are a little bit looser. It potentially could vary quite a bit as to how agencies are able to complete that, but that was the thinking around that. And then I think with medically fragile was just generally like still providing a benefit if somebody needed heat.

Tillis, Daniel

The rental assistance application example is a good example for the agency. The data you all might already have. For medically fragile one way I thought about it is you know we have customers who have medical certificates that allow some additional protections related to disconnects for non-pay as an example, and so we could exclude any customer who has a medical certificate on file with Cascade to be

excluded from the random sample for income verification. I guess that could go against the approach of saying that nothing else is considered in the random sample but it's an option. Otherwise, we'll just have to talk through what else that means. I just don't know anything else about how we might handle that so some food for thought there on an option. And if a customer is medically fragile, it would be ideal if they had a medical certificate on file with the company so that we could afford them those additional protections. Now on to the rental assistance application, have you all had any conversations with Avista or PSE on categorical eligibility for the bill discount rate program?

Charlee Thompson

We have, for the first year LIHEAP eligibility feeds into this program, but I think for all other programs that might be related to rental assistance, the various types that are offered throughout the state that the agencies can be better too. That was more on the table for discussion in year 2.

Lorena Shah

That sounds right to me. And seeing with categorical, we just kind of agreed that we couldn't quite figure that for the first year but that we'd like the idea of some level of categorical eligibility. I'd be comfortable with your proposal though Dan about those that have a medical certification and exempting them from eligibility so that I think bears more conversation.

Charlee Thompson

Kind of on a similar note, to medically fragile, but going back to a slightly earlier point, maybe we can also make space in next week's meeting to talk about enrollment terms for customers on fixed incomes. I forget if we brought that up here before, so whether that's two years or three years or four years, some sort of extended term.

Tillis, Daniel

OK, that just made my head hurt.

Charlee Thompson

Lots of details, I forgot about that one.

2. Income collection as part of Bill discount qualification process (if time permits) – Dan Tillis
3. Maximizing Federal Funding (if time permits) – Dan Tillis
4. Set key topic(s) for next meeting – Dan Tillis

Tillis, Daniel

That's the first I've heard that come up, I don't have any thoughts or opinion on it right now. Since we only have 4 minutes left, let's talk about our agenda for next week. I think we were supposed to use next week's meeting to discuss the community-based organization program and finalize those details and try to get started soon on that program for the five agencies who wanted to be involved. So, I guess we'd really be talking about picking this topic back up on April 26th instead of the 19th. So that's a good reminder that next week's meeting would be all about CBO stuff. And I can put

together an agenda for that, it will be a brief agenda, but maybe some specific topics around the CBO program development. There are a few items for verification process and then we have the enrollment terms for customers on fixed income. We can keep income collection and maximizing federal funding on there if time permits. If everyone's OK with that because we need to get to those topics soon. Another great discussion with some agreements, so continue to make progress. If anybody has anything that can't wait until next week, just send via e-mail or reach out and we can talk then. One big ask for next week; if you're one of the five agencies who is participating, make sure someone attends. Give a lot of thought to how we want to finalize the CBO program that we were required to implement and want to implement this year and when we could get started on that. Have a great rest of your day.



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May 01, 2023

Ms. Amanda Maxwell
Executive Director and Secretary
Washington Utilities & Transportation Commission
621 Woodland Square Loop SE
Lacey, WA 98503

Regarding: UG-210755 Compliance Filing to Commission Request for Updates to Advisory Group Pursuant to Order 09

Dear Ms. Maxwell:

In compliance with Paragraph No. 78 of Order 09 in Docket No. UG-210755, Cascade Natural Gas Corporation ("Cascade") encloses for filing the WEAFF advisory meeting minutes. The following documents are submitted electronically as part of this filing:

- UG-210755-WEAF-Agenda-05-01-2023.pdf

If you have any questions, please contact me at 509.734.4549.

Sincerely,

Christopher Mickelson

Christopher Mickelson
Manager, Regulatory Affairs
Cascade Natural Gas Corporation
8113 W. Grandridge Blvd.
Kennewick, WA 99336
Christopher.Mickelson@cngc.com

Attachment

WEAF Advisory Group

Agenda

April 26, 2023

KEY TOPICS: *Post-qualification verification process, income collection as part of qualification process*

GOALS FOR MEETING OUTCOME: *Outline all components of the post-qualification income verification process, finalize income collection process, begin discussion on maximizing federal funds (if time permits)*

Bill Discount Rate – April 26 decisions/agreements:

- There will be 6 contact attempts for the post-qualification income verification process, with contacts 1 and 6 being conducted by the company and contacts 2 – 5 being conducted by the agencies.
- Cascade intends to provide the agencies with customer email addresses to use for contact attempts for customers who have provided the company their email address and are opted in to the company's cost savings category. Our Privacy Policy and WACs allow for this as long as we have agreements in place with the agencies that ensure the protection and proper use of the data.
- Process for medically fragile customers will be the same as for all customers in first year.
- LIHEAP will be applied before BDR rates
- CNGC will provide pre and post BDR billed amounts

1. CBO Program Reporting – Dan
2. Moving on to AMP discussion – Dan
3. Post-Qualification Verification process – Dan Tillis

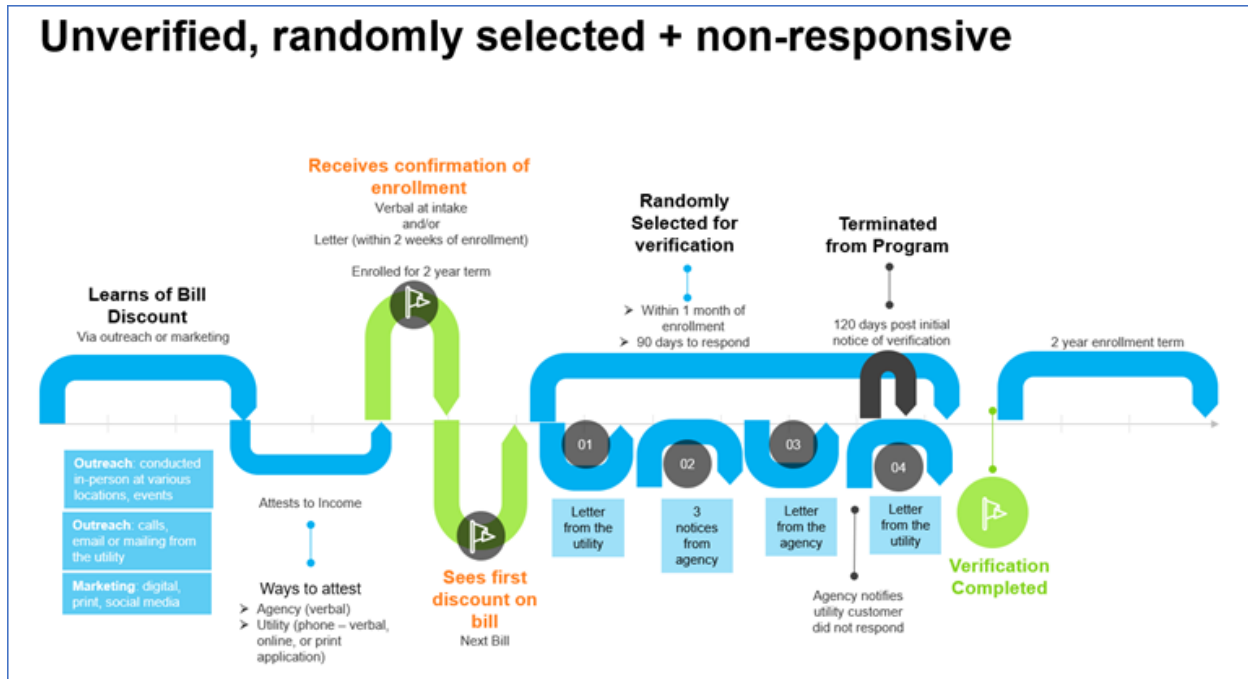
From Avista:

Verification What we've agreed upon

Verification	Intent to verify the program is engaging the intended population and providing the appropriate level of benefit
	<ul style="list-style-type: none"> ▪ Completely random selected pulled from the previous month's enrollments and no use of probability characteristics for identifying customers for verification because of the potential of the perception of bias (e.g., high energy users, high discount percentage) ▪ 6% of the total enrollment pool for random selection. Those who have been verified will be captured in the verified percentage amount but will not be required to complete verification
	The agencies support the monthly verification with a 90-day completion window once the process is started
	<p>The terminated from the program letter should:</p> <ul style="list-style-type: none"> ▪ address the reason with detail around the customer situation, such as: ▪ terminated because they were found to be ineligible are informed to contact their local CAA if their household situation changes ▪ non-respondents can contact their local CAA to complete the verification process to be re-enrolled into the program, if qualified

Verification What we've agreed upon, continued

Verification	<ul style="list-style-type: none"> ▪ Randomly selected participants will be notified there is 90-day timeline to complete the verification. If they do not respond within the 90-day window they will be terminated from the program. <ul style="list-style-type: none"> – If the participant does not complete verification, they will be terminated at 120-day point ▪ Randomly selected participants who have been terminated for non-response, and complete verification within 90 days post termination will receive a credit for the months they were not enrolled in the program <ul style="list-style-type: none"> – the credits should be specific for 1, 2 or 3 months and by income tier ▪ Non-responsive individuals may be verified by either of the following methods for continued participation in the program: <ul style="list-style-type: none"> – agency verification based on data – customer is identified as medically fragile (term to be defined; with consideration for WAC 480-100-128(8) that discusses medical emergencies) ▪ The verification notices/reminders from the agencies should be in the customer's preferred contact method, where possible (e.g., phone call, text, email or letter) ▪ The number of touches is sufficient (i.e., 2 letters from utility, 3 notices/reminders in customer preferred method for contact, and 1 letter from the agency). ▪ The 2-year term starts from the date of verification
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4. Income collection as part of Bill discount qualification process (if time permits) – Dan Tillis
5. Maximizing Federal Funding (if time permits) – Dan Tillis
6. Set key topic(s) for next meeting – Dan Tillis

Tillis, Daniel

We sent out the agenda late last week and we'll stick mostly to that today. I do have a few topics I'd like to bring up before we get back into determining the post qualification income verification process. Christie from Chelan Douglas did share some feedback on the CBO quarterly report, and so I thought I'd just share that quickly. It's the only group we heard back from on the report itself, and I wouldn't say there were major changes recommended and I thought they were all good. We did decide that we would modify this from their recommendation just a little bit. I thought I'd just share this briefly and let you all look through it for a couple of minutes and then see if anybody else has any additional feedback or if we could consider this document finalized for when the first report would be due. It looks like you want to modify the dates a little bit for when things are due, but it'd be July since we'd be going by actual quarters. But I can make those changes easily. Any immediate thoughts on the changes or the report as it exists right now either by verbal confirmation or thumbs up or comment on chat.

Charlee Thompson
I think it looks good.

Lorena Shah
I think this looks good too to start with.

Tillis, Daniel

I'll ask the question the other way, just so everyone doesn't have to comment. Anybody opposed to starting with this version of the report? Alright, you've got a few in the chat, Corey and Misty saying it looks good, so I'm going to assume we're good to go on this. I'll make these other corrections on those quarterly periods and the due dates and send it out with the minutes when we send those. I'm not going to share the agenda just yet, let me get to the second topic, which is new as well. We met with our IT team on Monday to give them a status update on where we're at on making decisions for the new bill discount rate, as well as moving to an AMP. They're starting the work that they can start; they need to continue moving so we can try to get close to the October 1 day with as much automation as we can, with as few manual processes as possible. They have been asking a lot of questions about AMP decisions, so we wanted to talk through when we think we're at a point with the EDP program where we have enough to file without working out necessarily every single detail, so we can move on to make major decisions on the AMP and file them as well by July 1, which is basically two months away. Then, we can get our IT team far enough along to continue their work, while we're still working out all the details of how the flow is going to go and how we're going to refer customers to the agencies. Any thoughts after today's meeting if we're at a point where next week's meeting could really focus on starting diving into the that discussion to get our IT team moving on that as well, hopefully getting to the point of filing for both by July 1.

Zakai, Yochi

One of the things that I think would be helpful is to compare the list of decisions we've already made with the kind of letter I sent earlier that kicked off the process thinking about the key things that I wanted to be sure we work through. Before we move on, I know a couple of meetings ago you had distributed a document that had listed the major decisions that we've agreed upon so far and you've been adding those in the notes as we go. Would it be possible for you to distribute another document after this meeting that covers all the decisions we've made? And then I'll go back and compare that and make sure that we've hit all the decisions that I wanted to make sure that we covered. After I've had a chance to spend some time with that document and do that comparison, then I would be prepared to answer the question about moving on to the AMP.

Tillis, Daniel

That's where we were going to go next, program design considerations, key decisions, and agreements document. I think a lot of these goals and action items aligned with that document you sent on behalf of the group, so that should hopefully all be covered in here. I was planning on going through this briefly today to get us a level set to continue the discussions. I can do that now and then I'll also share this when we send out the minutes from this meeting so you can review it. I'll provide a quick review of this document and then I'll pause after to see if you have any questions or any other thoughts and decide if we're getting close to the point of shifting the discussion to AMP. We decided to utilize a tiered structure with both FPL and AMI included for both the bill discount rate and AMP, customers will self-attest household size and income. Cascade employees will start qualifying customers for the programs as well. We would be establishing a post-qualification verification process that we're in the middle of discussing right now and we had said it was likely going to be conducted by the agencies as far as that verification process. We've decided since then that that would be the case. We decided on March 22nd, after discussing sticking with a WEAFF type program to complement the bill discount rate or shifting to an AMP that we would shift to an AMP and arrearage management forgiveness program and eliminate WEAFF as we implemented that and the bill discount rate. On April 5th, we agreed to these discount tiers

and discount percentages, and as I mentioned we agreed that the AMP would be tiered as well, and that's not on here. We have talked about arrearage forgiveness for the first couple of tiers and then some percentage of management/forgiveness as part of an arrearage management program for the other tiers. We haven't worked that out yet as far as what those are, but that was a general discussion we had and mostly agreed on. We worked through the auto enrollment process for customers who have received energy assistance over the past year or during the current program year, essentially, and how we would do that as far as using Cascade's Assist Portal to pull customers who received assistance during this program year and Cascade Auto enrolling those customers into the correct tier. And then pulling LIHEAP pledges from the assist portal and sending those to the agencies to utilize the new calculator to tell us what their FPL and AMI would be so we could enroll them then in the correct tier as well. And then if we can't determine their FPL or AMI for some reason, if we know they qualify for LIHEAP, then we will enroll them in that Tier 4 level at a 15% discount since we know that the customer qualified for LIHEAP and has an FPL of no higher than 150% based on that. For the last several meetings we've worked through a lot of the post qualification process, it's broken up a little bit here based on when we made these agreements. I'll go over the income verification first. We discussed these parameters for income verification the last time we had this discussion since we discussed CBO program last week. We decided that customers could only self-attest to qualify for a bill discount rate one time per year, and that they could qualify again via self-attestation. We'll provide these types of income as part of the discussion, and the details on income verification, but these are the types of income we'll collect and using our calculations. The post qualification income verification process, we decided we randomly select 5% of customers who qualified via self-attestation, and we'll do that by county to attempt to evenly distribute the accounts across the agencies based on customer count and the agency size. The customers will be provided to the agencies by Cascade at the beginning of each month for a previous month's self-attested qualified customers. Our goal is to use our assist portal to provide those accounts to agencies to work from there. Customers will be provided a 90-day window for verifying their income with the agencies. If the customer's nonresponsive during that 90-day period, hopefully within the assist portal, the agencies will close that case out and notify the company via the assist portal that the customer was nonresponsive. We will give an extra 30 days before we remove that discount in case the customer does still come in or there's something in process at the time before we remove the discount. If we remove a discount for nonresponse, then we will note the account to reflect that. If customers are removed from the bill discount rate program and after those 120 days, they contact the company within 180 days from when it all started, so within 60 days after the discounts removed then our employees will advise the customer they were removed because they did not respond to the income verification request. The company will then refer the customer to the appropriate agency to go through the qualification via income verification, not self-attestation, since they can only qualify once per year via self-attestation and they were selected for an audit, so they need to go through the income verification process. If they requalify through the agency through income verification, then we'll restart the bill discount rate at the appropriate tier for 24-month period and we'll issue a credit for any discounts missed since the discount was removed. Again, agencies will close out the cases after the initial 90-day period and include a disposition of qualified at the current tier or not income qualified at all. I mentioned this already, but we did decide that we would go with a 24-month term for the energy discount for the bill discount rate and not 12. We discussed those two as options and we also agreed that we would allow the agencies to utilize alternate methods for verifying nonresponsive individuals. For example, I think Lorena advised if they have income and household size from their rental assistance

program application, they could utilize that to verify the customer without them having to contact and provide income and household size, so really income verification. I think that takes us to where we were before last week and this is just the CBO, very high-level agreements.

Zakai, Yochi

It's really helpful to have everything in one document. I'm going to look forward to reviewing it closely when I can have it out in full size on my screen. One thing that I think we had an agreement on that I don't recall seeing here and I could have missed it, was the demographic data reporting and passing that information on to the CAAs.

Tillis, Daniel

That's a great point. We'll need to get that added to the document. Before we send this out, we need to go back and look through some of the minutes where we had some agreements, can anybody else think of anything that might be missing off the top of your head?

Sovak, Teri

Just clarification and I know the decision's been made with this group, but just going back to the additional 30 days as a buffer, accounts bill every day and based on when the company is notified, I'm not sure if this is intended to be up to 30 days. If we're notified and the account could have just billed yesterday or it might be billing again in 20 days, is the expectation that we would have to hold on to that change until after it bills again to get to these 30 extra days of discount? Or is it just up to and then once we're notified basically going to that next billing period?

Tillis, Daniel

I think the reason you're asking the question in part is because we're going to be adding bill discount rates during the month's bill cycle. The 90 days is going to cross bill cycles, so you're going to have changes that are made during the month, regardless of the bill cycle.

Sovak, Teri

It will just have to be whether it gets picked up with the next bill so when that account next bills, can vary based on when we receive this information. It could next bill in a couple of days, for another account, it could next bill in 20 days. I'm just wondering if there's any expectation that if it hasn't met those 30 days after the initial 90 if there's an expectation that it must be held and we go back to a different effective date.

Tillis, Daniel

If I can ask a clarifying question - when the customer bills, if the bill discount rate is there, it's going to give them the discount for the entire month. If the bill discount rate is not there, it's not going to give them any discount at all. There's no partial discount, right?

Sovak, Teri

Right.

Tillis, Daniel

Right. So, it's either a discount or it's nothing. There's no way to partial month a discount since it's the driver of the discount in the system will be gone if it's removed.

Sovak, Teri

That's what I would expect.

Tillis, Daniel

I think it's already going to be complex enough to work these and giving that extra 30 days grace period. I think when we're notified by the agency that the customer didn't respond then we give up to that 120-day period from when that clock started and that's the day we remove it. We're already giving 120 for the customer to respond, basically. If they do respond after that then they get the discount back and they get credits if it's within 180 days from when the clock starts. There must be a clean cutoff date, 120 days, and that's it. Any different thoughts or opinions on that? No, ok. Does anybody have anything that's come to mind that might be missing from our list of agreements? We also agreed that we would utilize federal LIHEAP funds first before applying the EDP, so that's the bill discount rate, so that's probably missing. We can get that added as well. We didn't work out exactly how, but we did agree that the company would put in place processes, whether automated or manual, to utilize any LIHEAP credits, LIHEAP funds, and credits before we apply the bill discount.

Zakai, Yochi

That was a big one for me and I appreciate that you're going to apply that first and then the other part about keeping overlap. I forget if we discussed the agencies are going to want to be able to access pre discount usage to calculate usage for someone who's already on the discount rate, and so we'd want to make sure that Cascade's systems are able to provide both the discount amount and the bills so that the agencies can add those together.

Tillis, Daniel

In our new updated portal you all can access the bills themselves and you can also see 12 months of bills with usage. I believe that you should be able to have access to what you need without seeing the bill discount applied.

Charlee Thompson

I'm going back to the 120-day timeline, I just wanted to say that I appreciate Cascade's consideration and inclusion of the 120-day timeline. I know I brought this up and then it came from Avista's low-income advisory group discussions, so I just wanted to express that appreciation and I think that it will help ensure benefits are getting to the people who need it and giving them grace is a good approach for this first-year program design.

Tillis, Daniel

Maybe we can get this document updated sooner than the minutes and send it out so that you all can see it earlier. There's no reason to wait for the minutes to send it. We'll add that we'll maximize the use of LIHEAP funds or utilize all LIHEAP funds before we apply the discount rate and then we'll get this out to the group and then if you can let us know by the end of the day Friday what your thoughts are so we can move on to trying to get the big blocks of AMP put in place. Any other topics on this document or questions before I stop sharing it? No...Ok. Post income verification process or post qualification income verification process is where we left the last meeting. As I recall the discussion here on you being able to use alternate methods for income verification, there haven't been any decisions made with Avista on that or the other utilities. I suggested potentially we could use medical certificates to exclude customers from the random sample up front, if we wanted to exclude them and just avoid that process altogether for those customers. If that's a good way to define medically fragile or if there's a better way to do it.

Charlee Thompson

Within the past couple weeks since we talked about this last, Avista's BDR subcommittee has had a chance to talk about this and the decision point. At this time we're not going to have a specific path for medically fragile customers and the reasoning behind that was talking through the other safeguards that we've set up in place, which is aligning here with Cascade as well. If people come back and income verify, they get that credit and if they're removed, they have that extra month that leads up to that 120-day timeline again and we have the provisions for extended terms for customers on fixed income. I think it made sense with the CAP agencies in that discussion as we were trying to iron out what details could this be like. Is it necessary, was this an additional provision we wanted to add, and we just ended up with removing that from consideration for this year due to the other safeguards that we talked about. I'm curious if others are still interested in talking about this, but if not then it would be in alignment with the Avista to remove this for this year and keep talking about how we want to ensure these other safeguards and proper outreach as well.

Tillis, Daniel

That is very helpful. Any other input on this is approach and if we should replicate that for Cascade this year or any other ways that we might try to approach the medically fragile topic. I guess I would be comfortable with this approach; see how it goes the first year and then adjust if we feel like there needs to be additional protections in place for someone who's medically fragile or has a medical certificate.

Misty Velasquez Community Action of Skagit

You're saying anyone who has a medical certificate, do they still have to be income eligible?

Tillis, Daniel

What we're talking about is for the post verification process. There had been some discussion with Avista on ways to have additional protections for medically fragile customers, which wasn't fully defined either, how you define that or what those protections might be. As the agency gets that account for verification there are other ways to verify those customers beyond just them having to come in for income or provide income documents.

Misty Velasquez Community Action of Skagit

So a person could technically be over income, but have a medical certificate saying they have something medical wise and still get the discount?

Tillis, Daniel

No. They would still have been qualified through self-attestation by the company and then if they were randomly selected for that month to be verified to have income verified. Is there a way other than just having them come in and provide income to verify they are medically fragile?

Misty Velasquez Community Action of Skagit

So basically a person could go online self-attest stating their income is below the income level, then come in if they get picked for verification, provide documents saying they're medically needy or whatever they need is due to medical reasons and not have to provide income verification?

Tillis, Daniel

So that's not what we're saying right now. That was on the list to discuss - should there be another way for those customers to verify and stay in the program. What Charlee just shared is that Avista has

decided there would not be another way for that to occur and that they would need to follow the same process as non-medically fragile customers. It doesn't mean we can't do that, but that's what Charlee just shared.

Misty Velasquez Community Action of Skagit

OK. I was just curious and just clarifying what I'm what hearing.

Tillis, Daniel

Yeah. If we put nothing in place to be different for those customers than they those medically fragile customers would need to follow the exact same process as every other customer.

Misty Velasquez Community Action of Skagit

I'm good with that.

Tillis, Daniel

Alright. I'm going to move this along here. The last topic that was on the list that we haven't fully discussed is the contacts as far as who does them and when. We talked about Cascade doing the 1st and the agency does every other contact in between there, and then the company would do the final. If the customer's income verified, no other contact needs to happen. The last contact is the agency giving the customer the outcome. If something changes though, they are not qualified or their tier changes, then the last contact would come from the company to send the letter or e-mail stating what happened. Does anyone disagree with that? There are five total contacts from Avista, is that correct - 2 letters from the utility and 3 reminders?

Charlee Thompson

I see six when I'm looking at the slides.

Tillis, Daniel

You're right, I missed that last one there. This is from Avista's slides. The number of touches would be 2 letters from the utility, 3 notices and reminders, and the customer's preferred method for contact and one letter from the agency. Charlee or someone who's close to what's been discussed with Avista, can you walk us through this?

Charlee Thompson

The little dark circles that say 1,2,3,4, that's where I'm looking. That's the very first letter from the utility. It's going to be the notification to a customer that they've been randomly selected for verification. And here's what they must do to complete the process: here are the documents they need to bring, here is the CAP agency's info, etc. 1,2 and 3 are kind of this interim period within that 90 day period and these are the four contacts from the agency and this is where Avista is saying it's important to understand what the customer's preferred choice of communication or contact is, whether that be a letter or e-mail or text or whatever, a phone call, it would be in that form, or at least those 3 notices, the 2nd circle and those notices are saying you've been selected; here's all the information you need to complete the verification process; here's our contact information; here's the date in which you'll be disenrolled. Those 3 notices happen in the letter from the agency. The 3rd circle or 5th communication is the final communication from the agency saying 90 days is up, you will be removed from the program, but reach out if you want to be reenrolled and then that final communication is from the utility or the 4th circle is just after the 120 days have passed. The utility says it's the final notice, you've been disenrolled and you

can reenroll or reach back out if you want to reenroll, here are the steps to provide income documentation because you can only self-attest once in the program year as we decided. I know there was discussion with Avista's CAP agencies as well. And from my understanding from what I've heard from Avista's CAP agencies was that they already do a lot of work to try to reach out to customers when they're trying to get in contact for verification or things like that. All service territory agencies are different, so definitely interested to hear what everyone thinks about this timeline and this number of touch points.

Tillis, Daniel

For step 4, do you know if they are only planning to send a final communication if the customer is disenrolled, or if the customer's tier changes during the process, do you know, are they planning to send a letter or communication for that as well?

Charlee Thompson

That's a good question, and honestly, I don't 100% know that answer. Outreach and marketing are the final two or three topics we have to touch on with the Avista's subcommittee, so that might come up there as well. I want to note that so we do bring that up, that would make sense to me to have some sort of communication to let the customer know that their tier has changed.

Tillis, Daniel

Well, that was helpful for me, I have a much better understanding now. Misty, you made a comment here. There needs to be verification to the customer letting them know the outcome. We're making a change to the account, so I feel that the company should send a letter or communication to let them know that we're making some sort of change. We are doing that in Oregon today as we review the LIHEAP qualified customers that we're getting from the OHCS Oregon housing and Community services organization. If those tiers change based on the income data, we now have access after they qualify for LIHEAP, then we send a letter advising that it has changed. That's where we are getting more real time data starting with April's results. Any questions or feedback on that activity? Is anybody opposed to this process, which is this flow in in words.

Zakai, Yochi

I would say as we get closer to implementation, we should work closely on exactly what the communications from the company look like through the advisory group process.

Tillis, Daniel

That makes sense. We're happy to share what we develop for the communications. For step one and step four, we have some letters like that in place today. We'll work off those and get feedback from this group. I'm not seeing any hands or anything in the chat or anyone off mute so we're going to move on. I really think that takes us through the verification process. I did check Cascade's privacy policy and it does allow us to share customer data with organizations who are required within that agreement to handle the customer data strictly confidentially and for the specific purpose that it's intended for. I would consider our agencies in that category for the purposes of low-income assistance or energy efficiency. It's very specific there on the types of organizations that could be shared with, so I see no reason why we can't share e-mail addresses as part of the process. We don't record the customers preferred communications method right now, but I guess my approach would be if the customer has shared their e-mail address with us and they're opted into our category that would be applicable to energy assistance, then we can assume email is their preferred method. And if you send an e-mail as

one of these three contact points and Step 2 and you don't hear a response, hopefully you would shift to some other contact method. Any questions or input on that?

Roberts, Andrew

I think that at a high level that sounds OK. There are some WACs around information sharing, but as long as it's related to the primary purpose of the company, which I think energy assistance is, it's probably OK.

Tillis, Daniel

You're right, there are some WACs around e-mail, so I will go check those. We worked with that last year on another topic to make sure we were OK.

Roberts, Andrew

I'm trying to find the specific ones I'm thinking about. If I do find them during the meeting, I'll drop them in the chat.

Tillis, Daniel

Is there anything else that anyone thinks we need to discuss related to the post qualification income verification process? No...then I'm going over to the agenda. The next two topics we had if time permitted were income collection as part of the bill discount qualification process. Getting back to that agreements document where we had talked about income collection, we haven't worked out all the details on exactly how that will occur and how it will consider each type of income. It's within the calculation, so that was one item we wanted to get to next and then maximizing federal funding was the other. This doesn't mean that's all the EDP or bill discount rate topics, but those are the two we had up next on deck. I will ask this group if you have any preference to which one, we go to next.

Zakai, Yochi

I think we addressed maximizing federal funding at the beginning of the meeting, so the two points that I brought up, it sounds like we have a little bit of follow up on there, but I think we hit the key points from my perspective there.

Tillis, Daniel

Anybody else have on that topic? Anything you want to talk about today as far as maximizing federal funding, as I mentioned earlier? While it's not going to be easy at all, we are going to put as much automation in place as we can to do that, and then we'll have some manual work probably to make sure we're doing it right and consistently. But we will utilize all LIHEAP funds, including any credits created on accounts before we apply the bill discount rate, to use ratepayer funds to do that. And then, we will make sure, if they don't already, the agencies have access to both billed amounts and usage data on customer accounts. Anything else on maximizing federal funding right now?

Zakai, Yochi

The key thing on the usage was just that it would be the pre-discount amount that would be available to the agencies because when they're enrolling customers in LIHEAP, they're going to enroll them based on their usage or their total bill. And we want to make sure that the bill amount that's provided isn't the discounted amount because if we're calculating a federal benefit based on the discounted amount then we're not maximizing the federal benefit.

Tillis, Daniel

There shouldn't be any reason why the usage is impacted in any way by the discount, but only the bill amount is going to be impacted by the discount.

Misty Velasquez Community Action of Skagit

I'm wondering if because currently we see the bill amount, usage is in kilowatt hours, and we don't use that. We use what is billed to the client. I think that is what Yochi is talking about, that bill amount needs to be prior to the discount for us.

Tillis, Daniel

For what purpose?

Misty Velasquez Community Action of Skagit

To calculate our LIHEAP benefit.

Tillis, Daniel

OK, I thought for some reason you all use usage data for the LIHEAP benefit.

Misty Velasquez Community Action of Skagit

We use usage, but we use the amount of the bill to calculate our LIHEAP benefit.

Tillis, Daniel

OK, so you don't use usage then you use the bill amount.

Misty Velasquez Community Action of Skagit

Correct.

Tillis, Daniel

OK that helps. I don't know why I thought it was usage for some reason.

Zakai, Yochi

Because that's what the agencies call it. It's confusing to people who only know utility lingo.

Tillis, Daniel

I will confirm that we'll somehow make sure that the pre-discount and post-discount bill amounts are available in the portal so.

Sylvia Schaeffer

It's called B&U report. It's from Pacific Power and its billing and usage.

Tillis, Daniel

But just to be sure that when you're doing your calculations for LIHEAP, all you really need is the bill amount, not the actual usage. Is that right?

Lorena Shah

Yes, we put in dollars not therms.

Tillis, Daniel

OK, perfect.

Misty Velasquez Community Action of SkagitAnd Lorena, I'm just curious, when you're using it for weatherization, are you looking at usage?

Lorena Shah

The Con Ed and Weatherization team will look at therms to do modeling and that kind of thing. But we, no, they don't really do anything directly with it beyond that. The bill doesn't play into whether we make a referral or not, because we still use the dollar amount to determine. We still want therms on there for weatherization, it makes it handy. But we don't actually use it in LIHEAP.

Sylvia Schaeffer

For the OLIBA program, they only give a discount once you've reached over 600 kilowatts. So, for us, to explain to the client when they come in, we let them know that. It's good to see the kilowatt usage for us, you don't get the bill discount until you've reached over that 600 kilowatt. And I hope Misty and Lorena can testify to that. It does come in handy to the customer themselves looking at that report when they see it monthly for the 30-day readout to see the kilowatt usage. And then the basic charge for the 600, and anything over that 600 based on the tier Pacific power gives a certain discount on anything over those 600 kilowatts.

Tillis, Daniel

Can you confirm that you all can see the therm usage for Cascade in the portal today? I'm very confident you can, but I haven't looked at it in quite a while. Shannon can confirm for us, or I can check with our customer programs manager on my team who works on the portal and modifications to it. She's also the person I'll work with to make sure that you can somehow see pre-discount bill amount and post-discount bill amount. So, Lorena, thanks for putting that in chat you guys haven't seen it on that, Jen confirmed that they see therm, you see therms and bill dollar amount in in our portal today and there's no reason we would pull therms out of there, so that'll stay for sure. And then we'll just have to figure out access to the two bill amounts, and we don't have any minimum therm usage required to get a discount or to get any arrearage management assistance. We haven't talked about any of that, so I think we should be OK not to worry about that, but again, no reason why we would pull therms out of the portal. We have about 25 minutes left, so maybe we can have a little bit of discussion on the income collection. I want to bring one quick topic that just popped into my mind, for our next full group advisory group meeting, which should be on May 17th, I was thinking that would be an appropriate time, especially if we get some big decisions made on AMP, to provide that group with a comprehensive update on where we're at on the decisions we've all made so far and get their input and feedback before we move on too much farther. Does everyone agree that that would be a good time to do that? Alright, got a thumbs up from Sylvia. Assuming everyone else is ok with it. Ok, back to the topics, I think what we recommended was that we asked the customer for their gross income for the prior month, let's see if anybody has a different recollection of that discussion, or if that's where we left it.

Zakai, Yochi

Where we landed with PSE and Avista on this, I think, is instructive, they're going to look at the one month first and then if one-month doesn't qualify the customer, then I believe they look at three months and then if three months doesn't qualify the customer, they'll look at 12 months. I don't have those exact numbers in front of me, but that's the basic process and other folks can correct me if I didn't get that exactly right. I think doing something like that and following that process makes sense. Lorena

put in the chat 1,3,12. And I think we agreed that we were going to follow LIHEAP, so I think for consistency that would be helpful.

Tillis, Daniel

Consistent with LIHEAP, I hope you all can answer this question, in a lot of cases when Cascade gets into these conversations, it's going to be more proactive than a customer calling the agency for help, but the customer may just be calling to tell us that they need to set up a payment plan or payment arrangement, or share some other insight on the struggles they're having paying bills and our agents are going to be trained to go into that conversation about the options we have available for assistance. I think in those situations, it's reasonable for a customer to be able to pretty quickly provide their most recent month's income to help with that qualification process. Where I have a little concern is if that doesn't qualify the customer and we ask for three months and then 12 months, are they going to be able to give us that on that phone call or are they going to have to call back, which is OK if they have to call back, but any thoughts on how often someone would immediately have 3 or 12 months of income to share?

Lorena Shah

You're probably right to be concerned about that. I think most of our folks are qualifying on one month these days, so hopefully it won't be a lot, but if what they have available that day is not quite the right months that we need to look at, then we just send them out that 10-day notice to provide documentation, if we're talking about LIHEAP. Over the phone kind of immediate applications, especially when they weren't expecting to be offered a service like the BDR or an AMP because they were calling to get a payment plan, it might be a little trickier for people. Generally, a lot of people are going to be guessing on their income anyway, not everyone's going to have their pay stubs and be filling this out perfectly. You're going to run into this sort of pending application status for those folks. Jenn's adding in the chat another tool we use when people can't get their documentation, or they've lost pay stubs that kind of thing can work.

Tillis, Daniel

We'll go with that approach. We're not going to have our agents stay on the phone for 10 minutes while the customer tries to find that information. We would tell the customer to please find that and call us back. It's important that you call us so we can try to qualify you with the additional income information. If they're struggling with their bill, they're probably not seeing an increase in their income recently, but I guess it's possible that could happen.

Lorena Shah

In those events where somebody does start an application with the utility and for this reason or for another that application will be in your system like a pended application, or would the customer service rep not start one until they called back and had exact information?

Tillis, Daniel

If they start with the one month and the customer doesn't qualify, then there's not a pending application that remains in our system, but the CSR or credit rep should note on the account that they attempted to qualify the customer and they didn't qualify. The next agent, when the customer called back, would see that, and hopefully immediately shift to three months, knowing that they see that note.

Lorena Shah

So there won't be any issue if we've started an app over here because they ended up coming in and there's already one in process because you just wouldn't start one. They would just call back and start fresh.

Tillis, Daniel

We don't have the same application type process that you all have. We use a calculator much like what you're using for WEAF today that was provided for this program year, so it'd be very similar to that, and that's not saved anywhere, it doesn't connect to CC&B. Once a customer qualifies using that calculator, our agents use something called a communications app where they basically complete a form that currently goes to Shannon Steed. She will review and then in this case, see what we've pledged for the Oregon energy discount program and the bill discount rate so it is applied to the account. Our goal is to automate that without Shannon's manual intervention, but that's the way the process works today. The calculator gives what the discount should be, the form is filled out with the customer's information, the percent discount, and OLIBA and AMP assistance that should be applied. That goes to Shannon, and she reviews and does the work in CC&B. Jen's asking in chat if we will know what month they're qualifying when pulled for an audit. That's a great question. I have to see if there's a way for us to provide that, it doesn't exist on that form I mentioned earlier that ends up with Shannon and saved in our database. So when we look at our income window, here are the timeline interval periods. We look at these different types of income and know you all treat them a little differently and this is the gross deduction info on the far right. Is the desire from this group is for the company is to somehow discount those as these types of income as well in our qualification process?

Misty Velasquez Community Action of Skagit

I would think that yes, in order to qualify them, if you're doing the deductions the way that LIHEAP does the deductions you would need to have your CNG staff take off those deductions if they're giving you the gross amount.

Tillis, Daniel

OK. Anybody feel differently about that? We'll have to figure out how to do that in our calculator and how to collect the different types of income today, we don't do that today. It's just, what was your gross income last month and that's what's plugged into the calculator.

Misty Velasquez Community Action of Skagit

I would imagine there's going to be possibly some big differences when it comes to verification and people changing tiers at that point.

Tillis, Daniel

Whatever process we decide how we collect the income data would need to be the same process the agencies follow for verification. So, if we decided not to discount those income types, for example, then when you verify you would not discount those income types for the purposes of the company program, not LIHEAP, but for the company programs. I'm not saying that's what we're going to do, I'm just saying that those two things have to link.

Misty Velasquez Community Action of Skagit

So Lorena and anyone else, have we talked about how we are taking those discounts?

Lorena Shah

Yes, Misty, that's correct. They're going to set up their online application in a way that does separate out and includes a check box for all the different types of income that the household has.

Misty Velasquez Community Action of Skagit (Guest)

So for consistency within agency staff so that they're not having to remember 3 different ways of doing verification and different program wise, I would say for consistency I would vote to take the discounts.

Tillis, Daniel

And just for the record, that makes it inconsistent for Cascade employees because we don't do that for Oregon and our Cascade employees take calls from both states.

Lorena Shah

So for Oregon, you just get basically one field, one number that goes in there and that's last month's total gross income for the household.

Tillis, Daniel

Correct.

Lorena Shah

I can appreciate both of our dilemmas here. There's a part of me that's like it's more for us to manage and Misty and Jen and Marie feel free to, Sylvia, feel free to push back on me on this, but also there's a part of me that kind of likes trying it a couple different ways, like having some differences between the two utilities to kind of test over time what does make sense so we can adjust.

Misty Velasquez Community Action of Skagit

Here's my concern, Lorena. If you're doing that and we are automatically enrolling people with LIHEAP amounts, those have the discounted price or discounted amounts.

Lorena Shah

Right. Well, maybe that's a bonus for coming to the agency. You get put into a more beneficial tier because we're looking at your income in a more nuanced fashion. Yeah, it's a dilemma because I can totally understand where the utility is coming from and not wanting to manage to having things done two totally different ways and, we're looking at two to three different ways, so not quite sure what the solution is there.

Tillis, Daniel

There's a lot of things we talked about through these decisions, not only are they different for our team members, but they're going to add a lot of time to these discussions and we're going to have to figure out internally how we handle that.

Misty Velasquez Community Action of Skagit

Are you using gross or net because the reason we take those percentages off is because they pay taxes and stuff out of there. Their gross income and those percentages are supposed to offset that, so are you using going to use net income after taxes?

Tillis, Daniel

I'm just trying to check something real quick so I don't give you the wrong answer. I've been saying gross, but since you asked the question, it makes me want to confirm. So, Lorena, I'll answer your

questions while I'm looking for this. The plan is both, however the online applications won't be automated, showing you qualify and here's what you qualified for. It will be you're submitting a form and then you're going to get a call back from one of our customer support reps who will take the customer through the same qualification process that an inbound CSR would have taken the customer through on the phone. So, essentially the same process if we if we decide to collect the income, though, we'll try to set up the online form the same way, so that when that customer support rep gets that form to call the customer back or to call the customer, they'll be able to use the calculator up front. Then it'll just make them more efficient in the discussion with the customer. I can't find what I'm looking for, which makes no sense, so I'm going to have to say that I will answer that question before our next meeting. We're starting to run out of time, so I think we're going to have to decide on how we approach income collection as far as the two options we've talked about, I'd say almost three options now that we've talked about the difference between gross and net. My recommendation right now would pick up next week, try to finalize any decisions we need to make around this and then I will send you all the other document that we reviewed with the key decisions and agreements hopefully by sometime tomorrow morning, if you could let me know by the end of the day Friday if you think we are far enough along with EDP to pause those discussions and move to AMP. Try to get the big decisions made for AMP and then we can circle back to make the final decisions on both programs as far as the fine details that we're all going to have to agree to and develop and document. Jen made a comment in chat that the standardized would make sense, standardize net across all income types and I think that's fair, and if we're not using that today I would prefer to shift to using that, and just asking for that one income data point versus all these different income data points. I appreciate that input and that's why I said, I think there's three options on the table really; one is just collect gross, one is just collect net and then the other is to collect every type and apply the gross deduction that you all apply through the LIHEAP process. I think we have people in favor of all three so it's going to be a fun discussion next week.

****Dan confirmed that we currently use net income in Oregon.****

Misty Velasquez Community Action of Skagit

You mentioned if you go with one income point on the application, are you going to have a little check box so that they can mark off what kind of income they have?

Tillis, Daniel

I think the online application that someone mentioned in one of our discussions that's what PSE is planning to do. Chris is no longer on the on the meeting, but for the internal calculator, we would either have drop downs for our agents to select and then put the amounts or check boxes or maybe just open fields for them to enter for that income type next to it. He's the expert in that.

Misty Velasquez Community Action of Skagit

I'm just curious on that because when it comes to us, if we get it for verification, we want to have something to go off of for the kind of income that they specified. Tillis, Daniel

I'll just make a note of that for the next week's agenda, when we get some idea of whether we're going to move to AMP next week if we're not going to move to AMP, then the other part I would like is what other topics besides income collection you would want to discuss related to EDP next week. If your opinion is we can't move to AMP yet, please let me know what else you would like to discuss related to EDP so I can create the agenda for next week if we're not going to move to AMP. That's funny, Lorena

says we can't even get agreement amongst the agencies. Alright, thanks everyone it's been a great discussion, hopefully you're not tired of hearing me talk - I'm open to others talking more than me next week.

Charlee Thompson

Thanks, Dan. You did a good job. It was a good discussion.

Ideas and requests discussed for income collection:

Start with 1 month, if not qualified, go to 3 months, if not qualified, go to 12 months.

****Will agencies know what month they are qualifying when pulled for audit? and if 3 mo or 12 mo is used?***

****Agencies would like to know income types regardless of collection method**** Dan confirmed that income types are part of the additional data CNGC will collect and provide to the agencies.

Gross Income Type	Types of Income	Gross Deduction
Fixed Income, not taxed	SSA, SSDI, SSI, Pension, Unemployment, VA	0%
Fixed income, taxed	SSA, SSDI, Pension, Unemployment	10%
Earned Income, taxed	Regular earnings from a job	20%
Self-Employment	1040 or Any type of self-employment that has costs associated with it	50%
Other Cash Income	TANF, Child Support	0%



May 08, 2023

Ms. Amanda Maxwell
Executive Director and Secretary
Washington Utilities & Transportation Commission
621 Woodland Square Loop SE
Lacey, WA 98503

Regarding: UG-210755 Compliance Filing to Commission Request for Updates to Advisory Group Pursuant to Order 09

Dear Ms. Maxwell:

In compliance with Paragraph No. 78 of Order 09 in Docket No. UG-210755, Cascade Natural Gas Corporation ("Cascade") encloses for filing the WEAf advisory meeting minutes. The following documents are submitted electronically as part of this filing:

- UG-210755-WEAF-Agenda-05-08-2023.pdf

If you have any questions, please contact me at 509.734.4549.

Sincerely,

Christopher Mickelson

Christopher Mickelson
Manager, Regulatory Affairs
Cascade Natural Gas Corporation
8113 W. Grandridge Blvd.
Kennewick, WA 99336
Christopher.Mickelson@cngc.com

Attachment

WEAF Advisory Group

Agenda

May 3, 2023

KEY TOPICS: CNGC Accounting Order Petition, Income collection as part of qualification process, TEP Feedback, AMP

GOALS FOR MEETING OUTCOME: Review and address questions/concerns related to the CNGC Accounting Order Petition, finalize income collection process, level set on agreements, begin discussion on AMP

Agreements from 5/3/23 meeting:

- Cascade will utilize income collection process that is consistent with the agency process for LIHEAP qualification. See below under agenda item #2 for the table with income types and deduction percentages.
- Agencies will also utilize self-attestation for qualification. The process for qualifying customers for the BDR/AMP and LIHEAP at the same time is TBD.
- Cascade will create a paper application for agency use. The paper application will also be available to be printed from our website or mailed to customers upon request.
- Qualified customers will be required to opt into allowing the company to provide their account, contact income, HH size, and optional demographic data to the agencies for the purpose of determining if they qualify for additional assistance and for income verification. The full list of data to be provided and method for providing are TBD.
- Income Changes – Reporting increases in income is optional, not required. If a customer reports a decrease in income after qualifying via self-attestation the company will refer the customer to their local CAA for income verification before any changes to the BDR are made.

1. CNGC Petition for Accounting Order for Program Cost Deferral – Chris
2. Income Collection Process – Dan

Gross Income Type	Types of Income	Gross Deduction
Fixed Income, not taxed	SSA, SSDI, SSI, Pension, Unemployment, VA	0%
Fixed income, taxed	SSA, SSDI, Pension, Unemployment	10%
Earned Income, taxed	Regular earnings from a job	20%
Self-Employment	1040 or Any type of self-employment that has costs associated with it	50%
Other Cash Income	TANF, Child Support	0%

3. Review TEP's feedback for Agreements and AMP - Yochi
4. Avista AMP Overview and General Discussion – Shay Bauman
5. Set key topic(s) for next meeting – Dan
6. Topics for 5/10 Meeting – All

Tillis, Daniel

Our first item on the agenda, Chris are you ready to discuss that topic this week or would you like to delay it for any reason? Yochi suggested delaying in chat.

Mickelson, Christopher

I'm ready to talk about this now, but if people want to push it off another week, that's fine too.

Tillis, Daniel

Let's talk about it now. Anybody else have an opinion one way or the other?

Yochi Zakai

The thought that this discussion could occur at the end of one of our meetings because I think it is most relevant to a smaller group and I was specifically thinking that some of the Community Action Agencies might be interested in dropping offline since we're talking the regulatory weeds of accounting.

Tillis, Daniel

OK. That makes sense. We will hold 15-20 minutes at the end. The next topic we had was income collection as part of the qualification process, specific to Cascade employees collecting that income data. It was a really good discussion last week and I think we talked through the options we have available. We have three options, but I don't think the way we're doing it in Oregon today with asking for gross income is an acceptable option for this group, and I agree with the reasons why that's the case. In my opinion, we have two options - One is to ask for the most recent month's net income for the household, and then if one month doesn't qualify, we go to six months and if that doesn't qualify, go to 12. So that would likely be part of the process, and that's certainly a simpler process for the customer to just give a total combined net income, and it's certainly a better process for the company's employees to collect the income data. The other option was to ask for each type of income that is listed on this table and discount them with those gross deductions. For example, 10% for SSA, SSDI, pension, and unemployment; 20% for regular job earnings; and 50% for self-employment income. Our employees would need to ask for each of those types of incomes, input them into our calculator, and Chris would need to discount them and determine the customer's qualification. We are at the point where we need to verify the calculator would have the ability to discount those income types. It makes the calculator more complex as well for the Cascade employees, so I think you can tell that my recommendation would be for us to ask the customer for their total net income for a month, six months or 12 months and then utilize that in the calculator. I know we want to collect the different income types as part of the optional demographic questions. I'll just open it up to other thoughts and feedback or recommendations.

Mickelson, Christopher

Dan, I heard you say net. Do you mean gross like we do in Oregon, or do you truly mean net? And this may be for the other folks in the group when we do this gross income type, I see the gross deduction;

let's take self-employment, if a person who's self-employed indicates they make \$6000 a month, does this gross deduction say then you get a 50% reduction. So really, we would only say \$3000.

Lorena Shah

Yes, if that is their gross profits before their own cost of doing business deductions are taken out. If \$6000 is their gross profit, then we would take 50% deduction and enter \$3000 if that's how we would handle it. We asked for gross profits.

Tillis, Daniel

And Chris, I do mean gross. That's not the way we're doing it in Oregon, the reason these deductions are applied in the LIHEAP qualification process is to get to a customer's net income, essentially, so by collecting gross in Oregon, one would argue that we're calculating the customers energy burden or their FPL or AMI in this case, money they're earning but not money they're bringing home. The desire here is to calculate based on money they have to spend, which is net income.

Lorena Shah

I would say generally speaking deviating from the chart will make it more challenging for training for our staff because they'll have to handle CNG quite a bit differently than we handle PSE and probably Avista and LIHEAP, so I'm leery of that. But I also hear your position as well as the company. I'm curious to hear what other agencies are thinking. I'm also wary to use just straight net income because it can vary so much based on optional deductions that people take from their paychecks. I think it'll be fine one way or the other for most of the fixed income types; those have less of a deduction associated with them. It's really the earned income.

Misty Velasquez Community Action of Skagit

I'm very leery to deviate as well. My other concern is we have trained our communities in this way with the gross income, and we take the deductions to calculate their income. They're fully aware for an energy assistance appointment that this is how it goes. We also have people who are self-employed, and I love the 50% deduction because I have had people bring me suitcases full of documents and have had to figure out what their net income is that way because they don't know how to do it. Now that we can just go with the 50% that it makes it so much easier, but for training wise keeping everything similar is what I would vote for.

Tillis, Daniel

Yes, one of the topics we haven't really discussed too much is if the agencies continue their process today of requiring appointments and getting income data or income collection up front and income verify customers to qualify for these new programs, or will the agencies utilize self-attestation as well?

Misty Velasquez Community Action of Skagit

Through Puget Sound Energy we're going to follow the self-attestation because that's the way that program is being created and I don't have any intentions of asking for documentation up front. When I do a PSE Help appointment with clients or process the PSE Help stuff, when they schedule their LIHEAP appointment, they will be required to bring in that documentation. How does Cascade Natural Gas want us to proceed with that, fully self-attestation or do you want us to collect documents if we are seeing clients in office and signing them up?

Tillis, Daniel

My thoughts were that we would go with self-attestation as well unless you're doing a LIHEAP appointment at the same time. We just haven't talked about it explicitly.

Misty Velasquez Community Action of Skagit

I would imagine we would probably follow the same process we're going to do with PSE when we determine how we're going to set up our programs here at Skagit.

Lorena Shah

We've got kind of two different things going on. We've got both the BDR and PSE help and so, like Misty said, using self-attestation for the PSE programs, we have to for the BDR because of the way the legislation is written so we can't really take the time to wait for income documentation to come in to process a BDR where we still have that discretion for PSE help if an agency determines that it makes more sense with their business flow to wait for documents to come in to process the PSE help. I think most of us would know if somebody's coming in for the first time and getting BDR and Help for PSE, we would use a self-attestation now with PSE program. We have some rules written in, or we're finalizing some working rules that state if PSE help pledge is not paid yet and the income is changed or you determine something differently you can adjust it, so I don't know with this process if we want to have a rule that says if processing LIHEAP and BDR at the same time you start using self-attestation. But if income verification comes back through the LIHEAP process, you would adjust a tier. It might be something we want to consider. We are planning to also honor the self-attestation when we process those. It's just going to be a little bit of a tricky conversation with clients if we're trying to do both at the same appointment because we're talking about LIHEAP and what is needed, and then trying to get them to self-attest differently to in order to process the BDR application.

Tillis, Daniel

I hear the concerns about it being a different process for the agencies with PSE and Avista. If we start with just total net income in Washington, we will actually shift Oregon to net income as well so that our employees are using the same process for both states. I'm just sharing that with the group, we would align that in Oregon with Washington. We probably would not align asking for the different income types in Oregon if that's the direction we go, we would just have two different processes.

Tillis, Daniel

Chris, what are your thoughts on the calculator itself if we utilize the table to collect the different income types and then apply deductions to those?

Mickelson, Christopher

That shouldn't be an issue. By the way, I just want to have it on the record, energy burden is defined as a percent of gross household income spent on energy costs. So, going with the gross income method like we do in Oregon would be the proper method.

Tillis, Daniel

Has that come up in any of the conversations with Avista or PSE?

Lorena Shah

I would say the deductions that we take on the gross, we don't consider it net after we do this. I can see

where that terminology can make sense. Somebody on here probably knows this language better than me, but it's like adjusted gross income. I think is what we call it, rather than net income.

Misty Velasquez Community Action of Skagit
Yes, that's what it's called.

Lorena Shah
So it's not truly net, it is adjusted gross income.

Tillis, Daniel
Chris, is what you're looking at for energy burden, does it say gross income, or does it say adjusted gross income? Just curious.

Mickelson, Christopher
So Department of Energy, that's where the definition came from, says gross household income. It doesn't say adjusted or anything of the sort. I understand why maybe LIHEAP has this adjusted gross income. Maybe they have a slightly different definition.

Misty Velasquez Community Action of Skagit
Does Oregon verify the income?

Tillis, Daniel
Well, that's an interesting question. The short answer is not currently. In our tariff we included that we would conduct audits and verification of up to 3% of customers who qualify via self-attestation. There is low interest among the Oregon Stakeholder and Commission staff communities to conduct income verification. In our advisory group meeting last week, we shared a high-level overview of what we've agreed upon for Washington. We try to align between the two states as much as we can to make it easier for our employees and we like a lot of what we've done. There was low interest and some pushback on even starting a verification process.

Misty Velasquez Community Action of Skagit
The reason I asked that is because since we are going to be having these rules for the deduction set up, that is going to be a way that everybody can count the income the same way. If you're looking at a person's income when they're coming in and we don't take deductions off or we're looking at net or we're looking at gross it, some of these check stubs that we get daily, they're hard to read, they have gross and then they have an adjusted gross. The customers say I pay my medical coverage and it's pre-taxed so they have an adjusted gross that they can count instead of the gross income, but both are listed as gross income. I think having specific rules is going to help with deductions to help with the customers getting the right information to you all when they sign up for the program.

Tillis, Daniel
I think we discussed last week- whatever we decide for income collection will need to link to the process you follow for income verification. So, if we decide to do total gross income and just use that in the calculator, then the number you'll be looking for will be total gross income that the customer can provide verification of.

Misty Velasquez Community Action of Skagit
Didn't we decide that you are going to auto enroll people who benefit from LIHEAP? So, if you're going

to do that, this is the way we calculate that income. Wouldn't it be fair to everybody overall to take this as the income if we're going to use that program entrance into the BDR program?

Tillis, Daniel

I think that's a fair point that the qualification methods should match. That would mean we're probably not aligned with that in Oregon, so it sounds like the agencies would like to utilize the process for LIHEAP today. Are there any agencies who disagree with that? Chris - You're saying we can do it in the calculator, right?

Mickelson, Christopher

Yeah, we should be able to accommodate.

Tillis, Daniel

I think when we get into the process development internally for our calculator and for our team, we may need to lean on the agencies a little bit more to get a more thorough walkthrough of your process. We would want to know how you collect the income types and how you ask the questions about those income types. In the past we haven't discussed income with many of our customers at all. And in Oregon, when we discuss it for the current qualification process, we just ask for the most current month, most recent month gross income, and don't get into any additional detail. We need to make sure we have our team prepared for more detailed conversations on that, and I'm concerned that customers may not be ready with that level of detail with each type of income we talked about last week on a more reactive basis where they're not expecting to get engaged in a conversation about qualifying for energy assistance. I think Lorena mentioned they could give estimates and then later if they go through income verification and all is good, great. If it doesn't, then they may go to a different tier, but I do think asking for this level of detail could result in customer's needing to get that information and call us back. We'll wait a little while for customers to get the information, but we have other customers waiting in queue.

Misty Velasquez Community Action of Skagit

Are customers only going to be able to apply for this through a phone call?

Tillis, Daniel

No. We will have an online application.

Misty Velasquez Community Action of Skagit

So on that online application, is there going to be a paper application regarding it as well so that you can mail one to customers if they ask for it to be mailed to them?

Tillis, Daniel

We don't currently have a paper application for energy assistance. I don't know that I see a lot of value in that if they can do it over the phone and just call back and share with us the level of detail that they need, versus waiting for a letter and then sending that back in.

Misty Velasquez Community Action of Skagit

Right, but my only thing is you're concerned about clients not being ready with information when they call, but if they can go online and they can print out an application online and see what is needed for them when they make that call to sign up, then more than likely they'll be prepared with what they need.

Tillis, Daniel

We could certainly create something paper, but I'm just going to share with you what we currently have for Oregon today. I don't know if you've ever seen this. This is not what we're going to end up with for Oregon or Washington. We're in the process of redeveloping this for Oregon so don't get too stuck on any one item on here. Certainly, we will take any feedback you have as we go through this process, but this is not the final version that we'll have in Washington. This is the current online application in Oregon for our energy discount program, which is the bill discount rate program. It's basic with the information that's requested and that's one of the reasons why this will evolve. Rather than having a paper application, they would go online to submit their application, which will be different since we've decided to get the different income types. There would be either checkboxes or dropdowns for that income type. They would select it and input the number for each income type, and then submit. The form goes to our customer support team, which is part of our customer service team, and they review it, do some pre work to qualify the customer using the calculator and then contact the customer to finalize that process. They then complete all the work on the back end to get them enrolled in the discount program and AMP, if applicable. I would think a customer would want to go online rather than request or print a form and send it in, don't you?

Misty Velasquez Community Action of Skagit

I know that a lot of customers prefer to have something in writing and a lot of our seniors don't go online at all, and they'll either call to make an appointment, or they'll ask to have an application mailed to them so that they can fill it out and mail it back. When we're working with CBO, they're going to want an application that they can physically show to their clients and they're not always going to be behind a computer when they're out in the community working with clients, so I think a paper application is necessary, but that's my opinion.

Tillis, Daniel

It's really interesting the idea of a paper application never came up in Oregon over the last year or so. I can't recall any of our employees suggesting that a customer has asked for a paper application or any of the agencies in Oregon. Addressing the comment about someone going online and printing a paper application, I would think if they went online to print a paper application, it'd be as easy, if not easier for them to fill out an online application. The CBO point, I think, is a very good one. Honestly, I would prefer a customer call us and apply over the phone than have a paper application, and to me that would be giving the customer a card to call you or to call the company and apply over the phone versus handing a paper application and having the customer mail that in. If we decide to have a paper application, and we give it to the CBOs, as an example, is that going to be mailed to the agency, or is that going to be mailed to the company for processing?

Misty Velasquez Community Action of Skagit

If we're working with the CBOs, I would imagine it would be mailed or given to the agencies that are working with those CBOs to process that application at that point.

Tillis, Daniel

I get accessibility concerns, but if a customer has the option to call and fully apply over the phone, doesn't that address accessibility concerns?

Roberts, Andrew (UTC)

I don't think it addresses my concerns. A lot of low-income cell phone plans are by the minute.

Customers may only get a certain number of minutes, so they may be not able to spend the time on the phone to work through the application with the company. I think customers need to be able to request a paper application, not just go online and print it out because not everybody has internet access. I think they need to be able to call and request that application.

Tillis, Daniel

OK, sounds like I'm the only one that disagrees with the paper application, but I think it's going to be extremely low usage and we'll keep track of that and share that with the groups.

Lorena Shah

Dan, you're right that it will probably be low usage, but I think it's a really critical usage for those folks that just can't utilize the other two options.

Tillis, Daniel

I'll just say again in, in Oregon, and we're going on seven months of having that program in place and we do not have a paper form in Oregon, and I don't know of one request from any employee for the company or stakeholder where a customer has asked for a paper form. I won't debate it anymore; we have consensus other than myself, it sounds like, so we'll create a paper form. I don't recall what got us into the discussion about the paper form.

Misty Velasquez Community Action of Skagit

It was having the ability for clients to look at a form when they make a call or be able to see what they need at the time when they make that call, to be able to have the information available to them to determine what their income is and for your staff to be able to determine what their income. Flyers about the program could have information that they need to have prepared for when they called to make the appointment. When we advertise, we kind of list out on our advertising what is needed at the time of making an appointment, which is specific information about your income. If we just create the ways that they know ahead of time when they're finding out about the program, they'll have that information ready.

Tillis, Daniel

If you could share the flyers, you share what has the detail of what a customer needs, that that would be helpful for us both preparing our employees but also creating the paper form and any outreach that we'll have in place to educate customers on the new programs. So anything you can share, as early as possible, would be appreciated. I would like to get back to the paper form for just a minute. If the agencies are using the paper form to give to somebody or the CBOs are using it, are those going to be handled by the agencies for processing?

Lorena Shah

This may not be the final, but I'm thinking if we are working with one of our CBO partnerships, we likely would want to receive those so we could record them to use in our in our reporting that I'm doing for CNG. There may be other entities around our communities that would like to also keep paper copies to make it easier to connect to their clients. If we're not directly partnering or contracting with those CBOs, I could see the option to just send those straight to you all for processing. So, I think I would only want to see the ones that we're really working closely with and have reporting agreements with.

Tillis, Daniel

OK, we'll have to figure out the best process for those. We'll probably have to list all 12 agencies on the back of the application or something like that, we do that for some of our outreach already where we list all the agencies and state to contact your local agency.

Lorena Shah

If you don't want to mess around with listing all 12, you could have sort of a community stack for us and our CBO that just has the utility company on it, and then for those that are for our contracted CBOs, perhaps you just leave us some space and we can just enter our own information on there. I think we've got some options if room starts becoming an issue or if we think that having all 12 is too confusing.

Misty Velasquez Community Action of Skagit

I agree 100% with what Lorena just said and that's probably how we would utilize it as well. I also like having the application that a client would fill out so that when we go back to do verification, we have that to go off of when we're contacting the clients, as well and we would keep that in our file system after creating the application online or going in and creating, however the process works.

Tillis, Daniel

Any other comments or topics related to income collection? So just to recap, we've decided to go with the approach that's currently used by the agencies for LIHEAP and that sounds like will also be used by the other utilities with collecting gross amounts for each income type and then applying deductions to those. As part of that discussion, we decided in addition to applying over the phone and online as an option, we'll also create a paper form to be used and we'll need to work through all of those details as we get a little closer, after we get all of the big items decided on for filing. I'm not seeing any hands up or comments in chat. Our next topic is the email from Yochi in response to our request to move from the discount rate discussions to AMP design. Within that Yochi and others agreed, in separate emails, that we could do that starting this week, that we were far enough along on the bill discount rate to start trying to work out the high-level details of the AMP as well. Hopefully, we can file by July 1st for both programs. Yochi also shared some comments about agreements that may have been missing from the agreements document and the tariff, and then I replied with some comments as well. Is there anything else we need to discuss before we move into the AMP discussion? I do want to reiterate what I said in my response at the beginning of this email that we understand the draft tariff still needs some work and as we get closer to filing, it will need to be reviewed by this group with the opportunity to provide input and make adjustments. That was not intended to be even close to final.

Yochi Zakai

I thought that was the case. Just so you know, in responding to one, I wanted to make sure I was responding to both.

Tillis, Daniel

I think we could probably go through a lot of these fairly quickly because we're on the same page on many of them. Yochi, do you want to lead this part?

Yochi Zakai

I'd be happy to. You've done a great job facilitating today. It looks like we're on the same page for the first point that the customer can enroll by contacting either the Community Action Agency or Cascade. The second point was enrollment in the program, as a part of enrollment in the program, the customer

is also consenting to share whatever data is in their application with the Community Action Agency. The dual purpose of that one is the referral so the Community Action agency can follow up about providing additional services like LIHEAP and all the other programs that are offered, and the second one is for the purposes of income verification. If the customer is selected for income verification, then that information will need to be shared with the Community Action Agency. I think there are some other reasons as well that I could go into, but I'll leave it there for now and can expand on that more later if necessary.

Tillis, Daniel

I'm OK with that requirement. I just want to make sure from a Commission staff standpoint that they didn't have any concerns with that. It could be seen, I think, as a barrier to entry for those customers if that requirement exists and we're trying to keep those barriers entry as low as possible.

Roberts, Andrew (UTC)

I don't recall exactly what information will be collected on the Cascade form. I know earlier on in the process with Avista there was a significant discussion on this point and where things ended up was kind of a compromise. Is there somewhere that I can see specifically what data points would be included in the in the information sharing?

Tillis, Daniel

I can share that.

Yochi Zakai

While you're getting that, I would just observe that I think what most people would consider the more sensitive demographic information. All of those questions are optional, so the customer is not required to provide that information, and I think this is the same place we landed with Avista and PSE. The customer isn't required to provide the information, but if the customer provides the information, then it will be shared.

Roberts, Andrew (UTC)

Alright, thank you Yochi. I don't think we need to hold up this meeting for that. If you could just send me what the data points are in email, I can get back to you.

Roberts, Andrew (UTC)

OK. Thank you.

Yochi Zakai

I'm pretty sure this is the same place we ended up with in the Avista conversation. I would point out I hope that Cascade decides to store preferred language in their customer system so that they'll know a customer has a preferred language.

Tillis, Daniel

Yeah, that's where it will be stored and we've started the process to collect that information, but it's very early so we don't have much data at all in that area. Are they going to get this opt in consent to share information with the agencies before they ask those optional questions, did you get that far?

Yochi Zakai

I don't think we've developed scripts yet.

Tillis, Daniel
All right.

Yochi Zakai
I think that's kind of a communication plan and call center scripts, which I don't think anybody's at yet.

Tillis, Daniel
I think we're ready to move the next one.

Yochi Zakai
The next one was the referral process. This is very similar to what I said before, which is sharing contact information for the customers who apply for BDR, so that the CAAs can follow up and offer to provide additional services.

Tillis, Daniel
With that you mean that for every customer who applies and qualifies through the company, we send that customer's information to the agencies?

Yochi Zakai
I'm going to defer to the agencies to ask how this would best be accomplished.

Lorena Shah
I think my thought is either a weekly or monthly report. I don't think we need a ton of information from them. I think their FPL or AMI will be helpful to have so we can do a quick scan to see if they are eligible for LIHEAP or if we have other programs they may be eligible for. But I'm more of the mind to keep it simple with their contact information and their preferred contact.

Misty Velasquez Community Action of Skagit
I'm thinking along the same lines like their name, address, their preferred means of contact, because that's how we're going to get in touch with them, and either they're income that they reported to you or the percent of FPL so we can do a quick scan to see if they even qualify for any programs that we may offer, and then we would be able to give them a call to see if they would like to schedule an appointment.

Yochi Zakai
I just wanted to add, the optional demographic information would also be included if the customer provided it.

Misty Velasquez Community Action of Skagit
I would prefer how many people live in the household as well, because if I'm just looking at a name and address with an FPL, I'm going to assume it's a one-person household and then not going to be able to determine if they're eligible or not if I don't know how many people are living in the home.

Tillis, Daniel
The data we're providing, I think everything you've talked about would be in any reports we have. If we're going to use this referral process, we'd send that over to you so customer name, address, email address, and then all of the income, household size, and optional demographic data. We don't currently ask customers what their preferred contact method is, so we don't have a lot of insight into that right

now. It might have to be something we add to our process and include going forward, but I'll have to get that added to the list.

Misty Velasquez Community Action of Skagit
Do you have a contact method though?

Tillis, Daniel

We have a lot of contact methods. We have bill inserts; we have phone numbers.

Misty Velasquez Community Action of Skagit

No, I mean when you create an account with Cascade, do you collect a contact phone number so you would be able to provide that information to us?

Tillis, Daniel

From a safety standpoint, there has to be a contact number, so we're almost always going to have that unless it gets missed somehow. We ask for email addresses, customers can opt in to providing their email and of course, we have their mailing address. Since it's a valid business purpose and as long as we're sharing those with contracted third parties for the purposes of energy assistance, I think we're covered there with our privacy policy. This is the first time I thought about it being a company driven referral process where we provide this information directly to the agencies versus when we're qualifying the customer, we tell them you can also qualify for other services like LIHEAP and rental assistance and provide the local agency's phone number and address. We assume as a company that if the customer gives us their email address that is their preferred contact method. You will have the other contact methods also if you want to use those if the customer is not responding. I think it makes sense for us at some point to add asking that question somewhere in our flow, we don't provide that today as an explicit question that we've asked the customer.

Yochi Zakai

The next items are what I flagged that I'd like us to consider in the future. If you'd prefer to use our time now to discuss changes in income or your question about demographic data, I'm happy to do so. I also want to be cognizant of your request to start the discussion on the AMP program and put these on the agenda for future weeks.

Tillis, Daniel

I appreciate that. For the KPI's, I don't think we need to outline all those before we file. I think we probably need to decide on the possible extended enrollment term. I don't know if we need to answer that one before we file or not, so I think we need to address any of these that we need to come to a decision on before we file probably today.

Yochi Zakai

Well, then let's go through it, because I think that those first three are probably things we should talk about before you file. We've already received agreement on language and disability status, and it looks like Cascade had a question about what options are available for disability status. Could one of the agencies could answer that?

Tillis, Daniel

Lorena and Misty helped me via email this morning on that one, so we're good there.

Yochi Zakai

Next was change in income. The proposal that I want to put forward is that we don't tell customers that they're required to report any changes in income for the enrollment period. Some of these programs do tell the customer that they're required to come back and report changes. But I guess my preference is not to do that, but I think we do allow customers to tell us that their income has changed if they want to and then there are two options. If they do, one would be the customer says that they have an increase in income and one the customer says that they have a decrease in income. My preference is if the customer says they have a decrease in income, then what PSE decided is that they would enroll the customer in the new tier based on a self-declared income and then trigger the post enrollment verification process so that the that customer would be required to provide income documentation to the CAA. I think another option that could work is if Cascade can say that they don't want to deal with changing decreases in income after our customers already enrolled and just say that that's something that has to go through the Community Action agency, then the CAA would require documentation in order to process a decrease in income that changes the bill discount tier. I guess the last part about my thoughts on changes in income is that if someone wants to tell us that their income went up and that they want less of a discount then they should be allowed to do that via self-attestation to either the company or the agency.

Tillis, Daniel

Does anyone have any thoughts on customers not being required to report an increase in income?

Lorena Shah

I agree with Yochi's stance on that.

Tillis, Daniel

I don't recall what we have in the tariff in in Oregon, or what we have in our program guidelines in Oregon, Chris or Shannon? I don't feel like it's called out that a customer's required to report an increase in income, but I could be wrong on that, and I don't think our Cascade employees advise a customer that they're required to give us that.

Mickelson, Christopher

They're not required to do that, both the customer or our reps.

Tillis, Daniel

I would be OK with starting that way for increases in income and seeing if we have any concerns. I don't think there will be any. As far as customer's decrease in income. I think we addressed that a few weeks ago where we agreed that a customer could only self-attestation to qualify once per year. If they contact the company within that one-year period to requalify that we would refer them directly to the Agency for the income verification process, I think that's a good process to follow. A customer can only qualify via self-attestation once per program year. If they qualify via self-attestation on October 2nd and then they call us back in March and say my income has gone down to X and I'd like to see if I can get a greater discount, our CSR should look at the account, see the self-attestation already occurred, and then advise the customer they need to go through your local Community Action Agency to provide verification of that income decrease essentially.

Yochi Zakai

Yeah, I think that's reasonable.

Tillis, Daniel

Anybody have a different opinion? I see thumbs up. Now for enrollment.

Yochi Zakai

We agreed to a two-year enrollment term for everyone who comes on to the program, although there are the possibilities of an extended enrollment term for customers who have fixed incomes. I believe with Avista we did agree to an extended term, but I need to look that up because I don't have it off the top of my head. Lorena, could I call on you to discuss the types of customers that are on fixed incomes that typically we wouldn't expect that to change over a very long period of time.

Lorena Shah

That's going to be folks where the only income in the household is the fixed income, so that's going to be your SSI, your regular Social Security, probably also SSDI. So, the three that are administered by the Social Security Administration, pension potentially as well as if somebody has a private pension or employee union pension of some sort.

Misty Velasquez Community Action of Skagit

I don't know if we're going to be counting veterans as income, but that would be another one.

Lorena Shah

But VA income, which is kind of another piece, that's different. It's really going to be different between the utility and LIHEAP, because LIHEAP now doesn't count VA benefits at all. I think it's the Social Security and then a VA pension or a regular pension. What we don't count is the fixed income is TANF or unemployment because those are subject to change throughout the year.

Misty Velasquez Community Action of Skagit

Right. So basically, any income that's not going to change: a person's retirement, permanent disability, elderly, or something along those lines.

Lorena Shah

And we know they change from year to year, that there's always an increase, but it's minimal enough even on the big years that it won't make a tier difference or shouldn't warrant somebody having to reapply early.

Mickelson, Christopher

So Yochi, is the purpose of this extended enrollment term to essentially not touch these accounts for a longer period of time or because we know they have fixed income is that basically why?

Yochi Zakai

Yeah, to make it easier for the customer; they don't have to come in as often.

Mickelson, Christopher

I, myself, would disagree with doing this and I get that reasoning, but my reasoning is this would not be beneficial to those customers if they're truly on fixed income and we think it really doesn't change from year to year. What will change is the FPL and AMI baseline, which will be going, I would assume, up, but it could go down. If it goes up, then so does energy burden and where they fall within the tiers could drastically change. So, three years from now, maybe they were Tier 3, but because AMI or FPL changed, they now may qualify for Tier 2. I get why you're wanting to do it, but it may actually be detrimental to

those customers. This may be one of those things we just let this program go in place for two 3-4 years and reevaluate.

Misty Velasquez Community Action of Skagit

So the majority of these customers are probably also going to be getting LIHEAP from us.

Mickelson, Christopher

So then they'll certify anyway so it doesn't make sense then to have this.

Misty Velasquez Community Action of Skagit

Right, so what if there was a way if they came in for LIHEAP, we were able to go in and just adjust their income, but they didn't have to come in or they don't have to call, they don't have to go through the whole process again for a recertification.

Tillis, Daniel

Misty, if at any time the customer requalified with you in the next program year, they'll automatically be reenrolled for 24 months.

Misty Velasquez Community Action of Skagit

It sounds like it's going to do that anyway, if they're getting assistance through us.

Yochi Zakai

If they come in for LIHEAP every year or two.

Misty Velasquez Community Action of Skagit

I guess that's where that referral process is going to come into play too, for people who are on fixed income.

Tillis, Daniel

Chris mentions a great point, if customers are not requalifying, it could be to their detriment since they might qualify in the future, especially over a two- or three-year period, at a higher tier. So, it could be negative and then I think the other is you're treating these customers with a fixed income more favorably than you are a customer with a non-fixed income, but they may have the same FPL/AMI and so now because your income is fixed, treating you differently than I am, because your income it's not fixed and I'm not sure that's the right approach. Corey asked Shay Bauman to join us today to go over Avista's approach. Hopefully 13 minutes is enough time to do that, but if everyone's OK, maybe we can table the rest of this discussion and the other couple of topics on this email for next week and allow Shay the rest of the time in the meeting to go over Avista's program with us. Shay, I'll turn it over to you.

Shay Bauman (PCU)

Thank you. So, for those that haven't met me, my name is Shay Bauman and I'm a regulatory analyst with Public Counsel. I think I've sat in on a couple Cascade meetings before when Corey was out, but I'm mostly on the Avista group. I'm going to give an overview and I can definitely keep it short for you. Avista first implemented its arrears management plan back in 2021 and this slide here shows an overview of the current AMP guidelines, AMP being arrearage management plan or program. It is available to customers at 51 to 200% of federal poverty level, and it has an arrearage forgiveness program for those at zero to 50%. The benefit uses LIRAP funds to cover 90% of customer arrears as an incentive for regular on time payments, up to a maximum of \$2500. So, the way it works in practice, as

you can see what this example here on the slide is, they would calculate 10% of the total arrearage balance divided by 12, which would be the monthly payment for the customer and the other 90% would be the monthly payment from LIRAP, which would appear as a credit on the customer bill. If the customer misses two payments that are not in full or on time, they would be terminated from the program. But assuming they make all of their payments after 12 months, that bridge would be fully paid down. Recently, the LIRAP subcommittee has been working on evaluating the program and doing an AMP revamp, if you will, and some of the changes that we've made to the program so far are adjusting the maximum program benefit from 2500 to 5000 for customers that are experiencing an extenuating circumstance as long as that customer has made good faith payments and or been in communication with Avista regarding their situation. Now with the previous program design, the AMP could only be used once all other methods of assistance have been exhausted. This one does add a little bit of discretion for the Community Action agencies to enroll prior to all other forms of assistance being exhausted, as long as it aligns with their processes or can best serve the customer to avoid collections or something like that.

Mickelson, Christopher

Real quick before you go on the maximum is that for, since Avista and PSE are both dual utilities, is that for both electric and gas?

Shay Bauman (PCU)

Correct, annual amount but the program is only going to be implemented for a year. This extenuating circumstance maximum is only used once, at which point the group is going to evaluate the success of the program and if it should continue. So, one of the things that we had been grappling with is what qualifies as an extenuating circumstance and how do we want to verify that? As you can see at the top here with our initial program language, we had a list of all these different situations that could qualify as an extenuating circumstance, but we ran into a few issues with this. One was, whatever the reason may be, some of these situations can be very private and sensitive matters for that household, and the extent to which you know we want the agencies to ask for data to verify. That could be an issue, particularly with, you know, medical issues and such and one thing that the SNAP representatives had brought up is given sort of this broad definition of what could be an extenuating circumstance at one point, do they actually say no? If you think about it, simply being in a situation where a household has an arrearage balance that's greater than \$2500 alone is pretty extenuating in and of itself, so we changed the language to the below to basically add some discretion to the Energy Supervisor and Cares Representatives, which will be collaborating and evaluating each case. And because it has this broad discretion, we noted that if an application is denied, they should fully document why it was denied, and if a customer feels that they were wrongfully denied, they should be able to appeal that similar to how they can with LIHEAP benefits. In practice this looks pretty much identical to the previous program design, but just with a higher maximum. In the example here, the customer pays 1/12th of 10% of the total arrearage each month and is credited 1/12th of 90%. The plan right now, as I mentioned, is to keep it in place for one year to gather some data to determine if it should continue and make any necessary changes. If it does continue, since it is only one year, it can only be used once. But the terms for the AMP previously will remain for the customers up to \$2500, a customer could use it twice in a seven-year period with agency discretion to allow a third use within those seven years if the situation calls for it. And actually, when preparing this, I realized we hadn't really discussed how this would interact with how many times the customer can use the program, so I brought that up to Ana and she said we do need to

talk about that a little bit. That will definitely be worked out as we keep going through all of the language and then we have some preliminary KPIs on how we'll evaluate the AMP as well, was collections or severance avoided by program enrollment, what percent of those who are 60 days past due have enrolled in the AMP or received the arrearage forgiveness and the overall success over time and how was it administering for the Community Action agencies and the overall customer experience that we're going to evaluate. So that was a high-level overview, if anyone has any questions, I'd be happy to answer them. No questions.

Yochi Zakai

I just want to clarify my understanding of what the one-year term is for extending forgiveness from \$2500 to \$5000 as the maximum benefit, but everything else you've described is the permanent program, right?

Shay Bauman (PCU)

Correct.

Tillis, Daniel

So meaning that's a one-year kind of trial term for the extenuating circumstances?

Mickelson, Christopher

But for the \$2500 normal maximum amount, that's an annual number for each program, you're correct.

Shay Bauman

Yes.

Tillis, Daniel

I'll throw this question out there to ask you if there's been any discussion about an alternative option with Avista, and then maybe if we have any time left to get the group's thoughts on any appetite for an alternative approach for Cascade. Was there any discussion at any point of rather than using a 12-month period during which the customer would have an obligation of 10% of the arrearage amount and the AMP program would forgive 90% over that 12-month period, and then if arrears would be taken care of, in tiers one and two or 100% forgiveness is in place, but tiers 3 through 5 where it's a lower than 100% percent amount just giving that forgiveness right up front, applying a credit or pledge to the account up front and then working with the customer on a time payment arrangement that doesn't require an obligation to get that arrearage management or forgiveness up front.

Shay Bauman

You know, there might have been. They implemented this in 2021 and I started working here and being in Avista groups late 2020, so all of those conversations kind of happened before I started, so they might have discussed it and I could definitely ask my contacts over at Avista if they had, but I know that the design that we're doing now is sort of building on that foundation of the program.

Tillis, Daniel

Thank you. And I sent out that alternative approach, just Cascade's recommendation as a reminder of conversations we had months ago, to this group via email. Corey replied, indicating that he preferred the traditional AMP 12-month approach. I listed in there, what the company believes are the benefits of giving that percentage of forgiveness that's not 100% up front, and then working with the customer on an extended TPA that could be longer than 12 months depending on how much is remaining for the

arrears. We only have a couple minutes left but I really want to know if there's any appetite at all for considering that as an option for the reasons the companies presented.

Corey Dahl (PCU-he/him)

I'll just jump in and say I think it might be worth discussing and having the program before the group I certainly wouldn't suggest foreclosing that conversation before we even have it.

Tillis, Daniel

The main benefit I've heard where you stated in your email is that the 12 months gets the customer in the habit of making regular on time payments, and I appreciate that benefit. I think the company's position is that the other benefits of giving that assistance right up front with no requirement for the customer to maintain on time payments for that 12-month period feels like a greater benefit for the customer. That's really our greatest reason for wanting to take that approach. It does require less system work as well and would likely result in a more accurate process, but the main driver is really the greater benefit that we see for the customer, so with that, we're out of time. I know we had some lengthy discussions on several topics but all good stuff and Shay again, I appreciate your patience with us and that overview. I think for next week my suggestion would be to pick up where we left off on that email and then really pick up from Shay's review and I'll include screenshots I took of the slides and the agenda, if she's OK with that, or if she wants to share the presentation we could do that too, and pick up from there. I think that discussion on potential alternative approach and then whatever we decide on to really dive into the AMP design. I'll send out a suggested agenda, and if you all have anything you want to change or add, just let me know and Shay, thanks for forwarding the slides. Anything else before we wrap up? All right, thanks everyone.



May 15, 2023

Ms. Amanda Maxwell
Executive Director and Secretary
Washington Utilities & Transportation Commission
621 Woodland Square Loop SE
Lacey, WA 98503

Regarding: UG-210755 Compliance Filing to Commission Request for Updates to Advisory Group Pursuant to Order 09

Dear Ms. Maxwell:

In compliance with Paragraph No. 78 of Order 09 in Docket No. UG-210755, Cascade Natural Gas Corporation ("Cascade") encloses for filing the WEAFF advisory meeting minutes. The following documents are submitted electronically as part of this filing:

- UG-210755-WEAF-Agenda-05-15-2023.pdf

If you have any questions, please contact me at 509.734.4549.

Sincerely,

Christopher Mickelson

Christopher Mickelson
Manager, Regulatory Affairs
Cascade Natural Gas Corporation
8113 W. Grandridge Blvd.
Kennewick, WA 99336
Christopher.Mickelson@cngc.com

Attachment

WEAF Advisory Group

Agenda

May 10, 2023

KEY TOPICS: TEP Feedback on Agreements/Decisions to Date, AMP Options, AMP Program Design

GOALS FOR MEETING OUTCOME: Level set on agreements to date, decide on upfront relief vs. 12-month installments for relief, begin discussion on overall AMP design

1. Finish review of TEP's feedback for Agreements and AMP – Yochi

Tillis, Daniel

OK, so to save us a little bit of time, I'm not going to share the agenda as we start. I sent it out via e-mail. If you don't have it for some reason, I'll put the topics in the chat. Last week we decided we would continue where we left off on the discussion of TEP's feedback for the agreements, and in this case, AMP. We've had discussions on whether or not we want to go with the company's recommendation to provide all relief, whether it's full forgiveness or partial forgiveness up front or spread the partial forgiveness part over a 12-month relief period for Tiers 3 through 5. At that point I'll likely leave the meeting and then turn it over to Chris and Shannon to facilitate the AMP discussion. As far as starting to build the major components of that program design depending on where we decide on #2, that will take that conversation down whichever path we decide. Next week is the full advisory group meeting and we have a draft agenda for that. One of the items on the draft agenda includes providing the full advisory group an update on where we're at with the decisions we've made so far in this small group. And Jennifer Gross, on our regulatory team, has put together a draft of a presentation to share with that group. After today's meeting, we will update that with any decisions made around AMP. We'll actually socialize it with this group to give us feedback before next Wednesday's full advisory group meeting. So, we'll probably have that out by early Friday and would like to have feedback by midday Tuesday so that we have time to make any edits before the Wednesday afternoon meeting on the 17th. The other topic to share that we're going to cover, and it's within the presentation a little bit, for bill discount rate and AMP is the CBO program we all agreed on, so we'll update the group on where we landed with that and what the plans are for the rest of this year. We will also discuss other agencies opting in for next year. If you have any other thoughts on any other topics, let us know. That will probably be quite a bit of time on those two topics. I'm going to share the e-mail we were reviewing last week on TEP's feedback on the decisions and agreements. Where we left last week was a discussion around a potential extended term for customers on fixed income and the agency shared three or four types of income that would be considered in that fixed income category. The reason TEP asked to consider it is because those customers' income rarely change and when it does it's not significant changes and wouldn't force a requalification for enrollment. The company shared feedback that we think that could actually harm customers in the fixed income category because if their income is lagging farther behind, and they initially qualified for Tier 3 to 5, but now they might qualify for Tier 2 or 1, then we won't know that unless they contact the company or an agency to requalify. We also felt that 24 months is already an

the extended term; customers can requalify when they possibly get an AMP or LIHEAP or Winter Help. Any of those programs would automatically requalify the customer in any program year. It seems like it might be treating a customer with a fixed income at \$500.00 a month differently than a customer with a non-fixed income at \$500.00 a month. So same income, potentially same financial situation. I think we talked about all of that and then we decided to move to Shay presenting Avista's AMP program or components of that and decided to come back to this this week. If I missed anything, feel free to jump in and share. Jenn asked if the Winter Help pledge range is still \$50 to \$200 for the next program year; we really haven't gotten into any Winter Help changes we need to make or want to make. That's a topic we need to discuss, and I think that's open for remaining the same or potentially changing. The company's position at this point would be stay with the 24-month term for every customer regardless of fixed or non-fixed income and qualify them for the tier based on their income level and requalify every two years if they don't get any other assistance in between that time period or if they happened to qualify for some other assistance.

Yochi Zakai

So I guess I'll throw this question towards the agencies to hear your experiences working with fixed income. Are these the kind of people that we could see some benefit in extending this longer than two years because they struggle to make contact and reach out when they need help or is this a population where we generally see people may be coming in every year for LIHEAP anyway.

Misty Velasquez

From Skagit standpoint, our seniors are ones that we know call every single year. They know when they've got their last assistance. They know when they need to call in again. Those aren't the ones that I worry about having the proof or having the information needed. They're pretty on top of their finances.

Yochi Zakai

And the other major group is disabled folks that are in this fixed income category.

Misty Velasquez It's pretty much the same. They know what their income is and what their income is going to be. They know about the programs, and they come and get their assistance regularly every single year. They're part of our group that we target at the beginning of our season, so they're getting notices from us.

Lorena Shah

I would say for Whatcom, similar to Skagit, I think this is normal and customary. Seniors and other fixed income folks with disabilities are well attuned to getting in touch with us. There is probably some argument that there is a group of fixed income folks that may be newly welcoming into these programs that don't normally come to the CAPs. I'm fine with starting off with the two years for folks and then this might be an area that we revisit to see if it makes sense to extend these folks depending on what we learn in the next year or so.

Tillis, Daniel

I think that approach makes sense. I think there's a lot of components we'll want to revisit and see how it's going. And I think this is a really good one to put in that category about newly entered folks in the program who maybe aren't working with today. That leads me to ask if we could partner with you all to effectively reach seniors and disabled populations so our outreach is more effective,

whether that's direct outreach or whether that's through you all through the CBOs. It might be a good use of the CBO program if there are organizations out there who work with the disabled for an example and can help us educate those customers on the new programs.

Charlee Thompson

I also agree with Lorena. That was one thing I was thinking; we could just do a two-year term for now and revisit this next year. Another thought that I had was regarding the concern of having an extended term for fixed income folks could potentially harm them if they qualify for higher discounts and aren't receiving that higher discount. Hearing from Misty and seeing the comments in the chat from the other agencies about how many of the regular fixed income folks that they've been working with so far, seniors and disabled, knowing that they come in frequently and are on top of their finances and come back every year does make me think if there is some sort of change to their income, they would report that or would qualify for a higher discount, so I'm going to reconnect with the CAP or the company anyway. All that to say, I'm not sure if it's a huge concern, but I don't know this as well as the CAP agencies.

Tillis, Daniel

Yeah. One of the things that we're all going to have to figure out and we haven't even discussed it in Oregon is what does it look like at the end of two years as far as a communication to those customers who are coming off of their two-year term, to say your two-year term on your discount ends on X date and if you feel like you still qualify, you need to contact the company or the local agency by X date to keep that discount? The company does plan to have proactive communication to those customers to remind them that the term is ending, and they need to requalify.

Jen Rightsell

For fixed income they usually are subject to just a COLA increase every year so if they qualify in 2023, then if we extend this for two years, they wouldn't really qualify for a lesser discount next year because their income could be higher than this year.

Misty Velasquez I was just going to say the same thing as Jen, that their income really doesn't change all that much other than the COLA at the beginning of the year.

Tillis, Daniel

So it sounds like we have consensus to start with everybody receiving at a 24-month term for the bill discount rate and then evaluating how that's working for fixed income customers sometime within the first year or two of the programs. Anybody object with making that decision?

Yochi Zakai

That sounds good. My one last question on this topic would be, is there data that we could include in the annual report that would help us look at this question like the frequency at which fixed income customers are reenrolling? That might require tracking folks who are disabled or fixed income and not all folks who are senior or fixed income.

Tillis, Daniel

We are going to collect income types as part of the qualification process so we should be able to use that data point to track and identify their activity, behavior, and requalification; that's a good item to put on the reporting list.

Mickelson, Christopher

I think we had a disability as one of the optional questions in the demographics, so if the customer answers, then we would have that information too.

Yochi Zakai

Great. So, can the company note that as an addition to the annual report?

Tillis, Daniel

Yes, we'll put that on the reporting list. That takes us to the next item on as far as the key performance indicators and reporting. Typically, in our filing for programs like this, we do state that will have reporting and typically we state the interval, monthly or quarterly. We don't typically list every type of report we're going to provide. Two questions: one is does anybody have any thoughts on the frequency of reporting? And then do you have any KPIs that you've all decided upon yet that you could share with this group and the company? I think in Oregon we only do quarterly reporting on our bill discount rate program there. Any answers to those questions or any other thoughts on the topic of KPI so reporting?

Yochi Zakai

We haven't discussed tracking the success of customers enrolled by the company. How many have contacted the Community Action Agency for additional services? So that's something that I'm interested in seeing if we can develop as kind of a joint reporting between the company and the agencies. In terms of the Commission enrollment reporting and stuff like that, I haven't really thought about it but quarterly seems reasonable. But I think for most of the KPI's I would probably be OK with just an annual report to being an addendum to or replace the existing WEAf annual report.

Corey Dahl (PCU-he/him)

Yes, I'll second the request for referral data in terms of the success of customers enrolling in other programs when they're referred to the agencies. I guess just in terms of other indicators, I think it will be really helpful to review the requirements and duplicate those in Washington.

Tillis, Daniel

OK. Thank you, Yochi and Corey. And would it be fair to say that we agree that we'll provide reporting on certain KPI's quarterly and then we'll file an annual report with the Commission to replace the WEAf annual report, and the KPI's themselves are TBD, once we get to that part of the discussion.

Corey Dahl (PCU-he/him)

Yeah, I think that makes sense.

Charlee Thompson

That sounds good.

Tillis, Daniel

OK, great. Any objections to that approach? All right, the last is on a communication plan. I know this was on the original emails you sent Yochi as far as creating one of these, and I definitely think it's something we're going to need to work on. I don't think it's necessary we make any decisions on

this topic today and that anything there would be critical to filing. If we wanted to state in there the company and CAAs will design and implement a joint communication plan, we could do that.

Yochi Zakai

Yeah, I think that's good for the purpose of this filing.

Tillis, Daniel

We're keeping a list of agreements and decisions and also on things that still need to be decided and those are actually included in that presentation that Jennifer Gross put together that I referenced earlier.

Corey Dahl (PCU-he/him)

I assume that also means that items we discussed that we'll come back to next year and reassess will be included, correct?

2. AMP – Upfront relief for all tiers vs. 12-month relief period for tiers 3 – 5 – Dan

Tillis, Daniel

We'll try to identify what we've talked about as far as that goes and get those added to a list. We haven't been collecting those items to this point as far as I know, but we'll put together a list of those items that we want to evaluate during the first year or two of the program and discuss more and share it with this group. I think that covers everything that was in the email. The next topic on the agenda is the decision we need to make today on the design, the idea of providing forgiveness including tiers 3 through 5 partial, partial forgiveness there or split up, the company forgiveness or ratepayer forgiveness over 12 months and then a customer's obligated to make on time monthly payments of their percentage of the agreement over that 12-month period as well. I sent an email on the company's position on why we think the upfront forgiveness approach is better.

Yochi Zakai

I think it would be helpful if you could kind of summarize your thoughts on why your approach is better. Again, sorry, I know you put it in an email, but for me at least the verbal back and forth is how I engage best.

Tillis, Daniel

We think the biggest reason is the immediate help provided to the customer where, with the 12-month approach, the customer has to be concerned with their commitment for the 12-month period in order to earn the forgiveness in Tiers 3 through 5. With the upfront approach and Tier 3, there is 80%; The customer would get that forgiveness immediately on their past due balance and then we would work with them on the remaining 20% on a TPA the customer is comfortable with, within reason up to 12-18 months. If they've missed one of those commitments, we wouldn't take the arrearage forgiveness back and we would then work with them on another arrangement or on other options, potentially Winter Help, or something like that so there's no risk to the customer whatsoever. We think it's less complex and easier to understand for everybody involved-- the company, the agencies, the customer. Granted the agencies would be working with a different approach for the other utilities, but we think it's less complex and easier to understand. It's less complex implementation for the company, which means we would have fewer manual processes

and less opportunity for failure in a manual process, lower costs would be eligible for recovery from for the company. And, the one a few folks in this group have mentioned a few times is that it might be interesting for the utilities to try a couple of different approaches in various components of the programs as we've been working on design and we agree it would be interesting to see, when we look at all the KPIs and the reporting, if this approach is more or less effective than what Avista or PSE might be doing, whereas if we all go with the traditional AMP, where we spread over 12 months and we really don't have any way of knowing if one is better than the other. The TPAs really also help a customer acclimate to a routine of making on time payments. There's no risk that they might lose any financial benefit, but there is risk that they could go into the collections process so there is motivation there to make those on time payments. Anybody else from the company can feel free to jump in and share anything I might have missed.

Corey Dahl (PCU-he/him))

To your last point that you made, Dan, in terms of getting in the habit of on time payments, I think that is the real benefit or one of the real benefits of the other approach similar to what Avista is doing. And given the burden placed on the customer for the payments, it seems like those are more manageable payments. They would have to take care of their portion of the 10% of the arrearage. That brings me to my next question just in terms of what these discount percentages that you've listed would mean in terms of what the average responsibility would be for those customers at that income level. For customers in the Tier 5 income level, how big on average are the arrearages, being responsible for 60% of that spread out over time, is that reasonable or not? I don't know. What does the actual customer's responsibility under a payment arrangement actually look like?

Tillis, Daniel

The average bill for low-income customers designated as low income is \$860.00 annually.

Mickelson, Christopher

We did have it by the income. That's how it was reflected in the model. Here's the average arrears; here's the grant; here's what their post balance would be. I just calculated what their monthly payment arrangement would be, and as you can see, it arranged between \$13 and \$43, probably roughly on average.

Yochi Zakai

And that's assuming a 12-month payment plan?

Mickelson, Christopher

Yes.

Misty Velasquez

And that's on top of their bill.

Mickelson, Christopher

They're normal bills, but as Dan said, the payment arrangement for these balances could be greater than 12 months, maybe 18.

Tillis, Daniel

That's another advantage. With the traditional 12-month approach, the customers are required to go with that structure. If we go with the upfront forgiveness and then work with the customer on a

customized TPA, it's really up to the customer on what they want to schedule and it's between 151% and 200% FPL, so a customer might say you're taking care of 40%, I can take care of the 60% today or they might say spreading it over three months or they might say I need it over 12 months because my financial situation has changed drastically. It really gives the customer the opportunity to drive that partnership with our team to establish that TPA for their needs.

Corey Dahl (PCU-he/him)

I'd be curious to hear what folks from the agencies are thinking here since they are the ones that deal with customers on a more direct basis to understand what would be more manageable and ultimately for customers here.

Misty Velasquez

What we see when we have clients coming in now and they owe big amounts, and if we aren't able to help them pay off their entire amount that they owe currently, we talk to them about their budget, how much are they willing to put towards above and beyond. Are your people going to be talking to them about any of that kind of stuff because some of our clients who come in say, "We can't afford a single penny." I like having them come to the agency for help because we can go over all of that with them and talk to them about other options that might be available, so I'm wondering, are your customer service people going to be talking to them about how much they can afford?

Tillis, Daniel

I don't know if I would describe it as our team talks to customers about their budget, but that's exactly what our TPA conversations are like, and Teri is much more the expert on the details of those conversations than I am. That's where that customized TPA comes into play. We forgive 80%, \$160.00, how would you like to set that up for payment arrangements? That's the flexibility. Do you want to pay it now or do you want to pay it over 12 or 18 months? And when customers receive any type of payment including an AMP pledge or a WEAF pledge, it reduces and really takes them off the risk of disconnect as well. Teri's team works a broken payment arrangement report or pay plan report and they attempt to contact the customer who might break a pay plan or arrangement to find out what happened and what else they might need or what's going on to prevent them from being at risk of disconnect for non-pay. That's part of our collections process. We don't just automatically treat any account that might break an arrangement. We contact that customer again to try to get them back on another arrangement or get them to you all for LIHEAP or Winter Help to complement the AMP and what our options would be there.

Corey Dahl (PCU-he/him)

I'm just curious about the pathways that customers take into payment arrangements. I'm not familiar offhand with how the automated voice response system works with Cascade versus other utilities, but I do know with other utilities customers can get into a payment arrangement with the automated voice system that only offers limited options and so customers aren't aware that they might be able to pay over a longer period and understand exactly what their options are. So, I'm just wondering is there an automated process that Cascade customers go through or is there always a conversation that Cascade customers will have with the customer service representative? Because my concern would be if there is an automated process that customers would just get jammed into one option and not actually do what's best for them.

Tillis, Daniel

We do have both our IVR and our website where customers can enter into a pay plan. They can't enter into an extended payment arrangement on either of those platforms. I don't can't recall exactly what the limitations are off the top of my head, but there are limitations. However, if a customer chooses to do that, we're not going to have that conversation with them on that inbound call to discuss EDP or bill discount rate or AMP. They're going to either need to respond to outreach from us or an agency or potentially end up in the collections process and be contacted by one of our outbound collections reps to discuss options, which would include bill discount rate and AMP. If that customer is choosing to go through automation to set up something then regardless of what we decide on program design, we're not really going to be able to discuss BDR or AMP with them until until they decide to talk to us one way or the other.

Corey Dahl (PCU-he/him)

Why aren't customers notified through the self-serve automated options that they might be eligible for these programs? That seems like a really easy point of access to these programs, and if customers aren't made aware how are they supposed to know that those options are available?

Tillis, Daniel

That's a great question. I would have to find out if it's technically possible. It may just not be something our IVR can do as far as when they select that option to say, by the way, you may also be eligible for, what today would be, Winter Help, LIHEAP. So that's a question I have to ask. I've never been asked that question before and never thought about it, so I can't answer it right now. I think it's a really good idea though, if we can do it.

Yochi Zakai

I agree. If one of the options is enter into a payment plan, it seems like there could be an additional option that says if you meet certain income thresholds, you're eligible for credits; select this option. And it seems like even that might be something even worth mentioning in an automated way to every customer that is going into a payment plan that; we're happy you're interested in payment plan, but also want to let you know that there are there are options available.

Tillis, Daniel

I think it's a good idea and the person on my team who manages our IVR flow is here at these meetings with me in Portland so when I see her, I'll ask if we've ever thought about doing something like that. And we'll keep it on the list of things to consider, regardless of what we decide.

Yochi Zakai

I see two decision points here for us; the first one that we've been talking about is should the arrearages be forgiven up front versus the 1/12th per month, and then the other is the percentage of forgiveness for each income tier. It seems like you've aligned with Avista in terms of the 100% discount for up to 50% FPL and I think we heard that Avista was providing a 90% arrearage forgiveness for all other income qualified customers, so what are the correct percentages for Tier 3 through Tier 5 customers. What I am interested in thinking through and hearing from the agencies and others in the advisory group is, it seems like giving the customer the arrearage grant and then requiring that every customer who gets the grant goes on some kind of payment plan and maybe has a default of 12-18 months that would put the customer bill in the same place as the more traditional arrearage management plan that we looked at. I'm curious to hear from the agencies and

the others. It seems to me like it might be a viable alternative to forgiving 1/12th with every payment is providing the upfront payment and then making sure that every single one of those people also end up on an extended payment plan.

Charlee Thompson

I like that idea because the main concern that I had, which is the one that I think Corey initially provided feedback on, was that the traditional 12-month approach. While it's more complex, it is intended to reduce customer burden in the long run because they figure out how to make those regular payments. It's not immediate relief, but hopefully it would be better for both the customer and the company in the long run to have a more sustainable and durable practice at the customer level and not just because of payments.

Tillis, Daniel

What are the thoughts on what we've discussed so far on Yochi's thoughts? I would say if we decide to go with the upfront versus 1/12, this would be at the top of the list of items to evaluate, and I think it'd be great if we could share our data with Avista and PSE, and they share with us and we can all look at it together and see if anybody's having a greater impact than the other and discern the reason for that greater impact.

Charlee Thompson

The idea of like if we did something different, a very strong pro for that or benefit for that would be being able to try out a different approach and see how that compares with other utilities. I think that was the strongest argument that Cascade made for the upfront approach or upfront with a long-term payment arrangement or something like that.

Corey Dahl (PCU-he/him)

In terms of overlap of customers that are served by another IOU for their electric service that they might be in a situation where their approach to taking care of arrearages for their varying utility services would look different and I don't know how much of a concern that is or not is, just something that I'm thinking about.

Tillis, Daniel

I think that's a really fair point. I think about today, we have different processes between electric and gas for sure in a lot of different areas and we're trying to align as much as we can within a lot of what we're doing, and we did that through the bill discount rate. To me, this one's valuable enough to try something different and give customers the upfront benefit and put them on an extended pay payment arrangement that's worth the difference.

Mickelson, Christopher

I was also going to say most of the IOUs you guys are working with have electric and gas and serve most of their territory overlaps where it doesn't really overlap with Cascade. We serve a lot more PUDs and municipalities where none of these programs actually exist, so you will find customers may be asking their PUD why they can't have this kind of treatment.

Lorena Shah

I don't think I'm too concerned with the differences between the utilities too much because there's always been differences with the utilities. It would be nice, as we pilot all these different

methodologies over the next few years that we can kind of land on a best practice around the state. But until that point, things will look different and I kind of like that for a way to kind of test these approaches and as far as you know the option of the upfront forgiveness, kind of a customized payment plan, it seems like a good test. That seems reasonable.

Tillis, Daniel

This seems really formal, but I'm going to make a motion to start Cascade's arrearage management plan type program and we can decide what we want to call it, with an upfront forgiveness for all tiers, 100% for sure for tiers one and two and then TBD on Tiers 3 through 5 on those percentages. And then establish TPAs where those customers who don't get 100% forgiveness to meet their budget and needs and parameters around that, guardrails to make sure that they're not getting into the Collections process if breaking those arrangements. We can evaluate that and see how it goes and then shift to the 1/12th if we feel like that's working better for the other utilities and Cascade as well.

Yochi Zakai

Yeah, I think that sounds good as long as customers are given the option for the extended payment plan and perhaps even with a default at 12 or 18 months is what I was thinking. That sounds good.

Tillis, Daniel

I certainly have no objection to starting the conversation with - you've qualified for X percent of arrearage forgiveness, which leaves you with the \$200.00 balance; we can spread that over up to 18 months or whatever we decide. It makes the most sense and then let the customer tell us if they want to pay off faster than that and then have them negotiate us down to something shorter; I'm OK with that approach.

Corey Dahl (PCU-he/him)

I am not going to commit to saying whether or not Public Counsel approves of this option at this time. I'm going to have to take it back to our team to see what we think is best and what we can ultimately support down the line. Given the conversation, if Cascade would move forward, if Public Counsel would support this option, I think it would be necessary to include the option of payment plans longer than 12 months in order to provide support for this plan.

Tillis, Daniel

I don't think we actually even have a max on the number of months we're willing to set the customer up for a payment arrangement. We do know that the data shows that the shorter the arrangement the greater likelihood of success in completing that arrangement when they're extended out longer. A lot of things can happen in someone's life that could have an impact on being able to honor the arrangement, but I'd say up to 18 months is certainly acceptable to the company. Our goal is to get the customer help and also to ensure they can take care of the rest of their balance so they can stay connected and continue paying us for gas service. I don't know if Public Council not being able to commit to that today allows us to do that, but it seems like we had most everyone else agreeing that we could start there with the upfront forgiveness.

Yochi Zakai

We could go to discussing the percentage of forgiveness at each tier because that's a decision that has to be made either way, right?

Tillis, Daniel
Right.

Corey Dahl (PCU-he/him) (Guest)

I think that definitely could impact Public Counsel's position on this too.

Tillis, Daniel

Well, with that, unless there's something else for me specifically, I'm going to drop and let Chris and Shannon facilitate the rest of that or facilitate that topic. I'll read the minutes for the rest of the meeting, and then I'll create the agenda based on that as well. Make sure you save about 5 minutes to talk about the agenda for the 24th before you wrap up.

3. AMP discussion based on decision for #2 – Chris and Shannon

Mickelson, Christopher

You should be seeing the discount AMP percentages that Dan shared in his previous e-mail back to Yochi. Corey and other indicated they may be less liking the company's proposal. Obviously, any percent changes will add to the program cost and we're already starting to become very costly, and I do have concerns about the overall program costs and how that will look when we present this to the Commission.

Corey Dahl (PCU-he/him)

My position on this isn't necessarily that I like this less than the other option. It's just different than what we've discussed internally. Since I'm not sitting on all of the utilities' low-income advisory groups, I just want to run it by my colleagues to make sure that this is something we can support, or if we want to approach this with a consistent across the board. I want to be clear that I definitely see that there could be benefits to Cascade's proposed approach. I just want to make sure that our position is characterized correctly.

Mickelson, Christopher

Sorry, I'm not trying to mischaracterize anyone's position, just trying to have that open as a candid conversation, so please don't misconstrue the open candidness.

Corey Dahl (PCU-he/him)

It didn't feel antagonistic, so don't worry about that. I just wanted to make sure that our position is clearly stated, and I probably could have done a better job of stating it up front.

Mickelson, Christopher

Maybe I'll back-up a little and explain how Cascade came to these discounts. It's based very similar to WEAf and the benefit curve. Essentially the lower your FPL, the closer you are to 100% forgiveness. It never actually went to 100% forgiveness; I think it went up to 90% forgiveness. And then as you got up towards 200% FPL, you got somewhere in the 45-50% range I believe, so slightly less on the low end, but you're getting a lot more on the upper end and we figure those are the customers who need a lot more help and forgiveness because they have extremely low incomes, extreme poverty levels. Those are the people we really should be trying to focus to help. We're trying to focus on those making \$500.00 or less a month than those making \$3000 a month, and so looking at the WEAf benefit curve and where these FPL tier breaks were, I tried to round it up to the nearest 10 of a percent.

Yochi Zakai

Thanks, Chris. It's always super helpful to hear where the proposal came from and how you came up with that. Would you mind pulling up the spreadsheet again because I think this discussion would be well informed by being able to see the average arrearage and the grant amounts and then can I also ask in this version of the spreadsheet where is the arrearage data from?

Mickelson, Christopher

The arrearage data is based off of arrearage level. It's the percent, it comes from the assistance tab. It's based off what we've noticed over a two-year time period based off the different programs whether it was LIHEAP or Big Heart. Analyzing those different programs and seeing how much this different assistance helped customers pay off a lot of their arrearages, you get that percent off of the balance. And then we're multiplying how much of that average arrears would we forgive.

Yochi Zakai

So are you saying that the average arrears is calculated by looking at known low-income customers average arrears over the past two years?

Mickelson, Christopher

Correct. We had those average bills. We grossed it up for 25% for the most recent PGA and other pass-through increases that happened in the fall. Based off the different income levels, we were taking those averages that ultimately comes up with all this information. So yes, everything you're looking at on this dashboard is based off low-income bills or arrearages, or also from our report kind of given it into the different income tier levels.

Yochi Zakai

So I think those average arrearages are a higher than a version I had from a previous spreadsheet. Do you know why the one that I'm looking at, I think was more in the \$300 for average arrearage?

Mickelson, Christopher

I have this toggle on arrearages instead percent, so is that more what you were seeing on a previous version?

Yochi Zakai

Yes, exactly. Can you explain to me the difference in those two?

Mickelson, Christopher

Based off what I've been hearing, especially with the some of the maximum amounts, I was looking at different ways; one is the historical percent type base and then one based off just full average arrears and what that would possibly look like impacting the overall program costs. So, I built a new toggle. I don't think you have that yet, but kind of depending on where we put our maximum cap limit on this program would probably indicate which toggle will want to reflect.

Yochi Zakai

I'm going to have to ask you to explain again the difference between the two inputs when you toggle it.

Mickelson, Christopher

It is based off that average arrear forgiveness level. One is basing it on the average bill and the

portion they would get so unfortunately, it's a formula. You could maybe kind of figure it out, but I could try to think of another way to explain.

Yochi Zakai

Yeah. Could you? I'm sorry because the numbers are really different. And so, I just want to understand because I assume that you have well thought out reasons for why both are important to consider. And so, if maybe you could try to put that in writing to us, I would appreciate it because I think that would help me think about the decision that we have to make here.

Misty Velasquez

I'm just so confused. I know that you took numbers from WEA and what people are getting from WEA, but those top three tiers, all of those people would qualify for LIHEAP as well, which would probably take them down to not owing anything and not having to use an AMP if they got LIHEAP. You made a statement in there that you're focusing on that group of people more because they're going to be the ones who definitely need the help more, but they have more help than any of the other people available to them. Am I thinking about this wrong?

Mickelson, Christopher

So unfortunately, this is where we're kind of taking our internal historical information based off county. So, you can see the information here, what the total bills were by county, how many customers got served and the total assistance they received through WEA,, So you see total bill minus the total assistance. There was something left there. Now we're kind of taking this information and combining that with our LINA report to figure out what portion coincides within those counties, at what income tier. There are some assumptions based within that and so it's not going to be perfect. That's kind of where I've indicated along the way, obviously a lot of this will change, especially after we have the program in place 3-5 years, and we have real good solid data. We will have a trend line we can start to go back really then and look at our discount levels, look both for their arrearage management and energy discount to make sure there is proper alignment. So unfortunately, right now we don't have all the information we need to make the soundest decision.

Did that help?

Misty VelasquezNo, but that's OK. The reason I'm bringing it up is because I know that we want to help people who are most in need, but those people probably will never have to use this program because they're going to come and get the other assistance that they have available to them. But the people who really, in my opinion, are most needing of this program are the people who don't qualify for LIHEAP.

Mickelson, Christopher

So you're saying we wouldn't even need 100% for these top two tiers if I'm hearing correctly?

Misty Velasquez

If the clients are coming to us and getting LIHEAP, I don't see why they would need an AMP program at all because they're going to be coming to us and getting LIHEAP. They're going to be getting the rate discount program which would take their bill down, probably won't have an arrearage. If they do, I understand we need to have that in there, but I don't foresee a client who's at that income

level needing an AMP because they have so many more programs available to them than the people who are above 150%. Does that make sense?

Yochi Zakai

Misty, could I respond to that? So, I think there are two things: one is should eligibility be contingent upon exhausting other forms of assistance? You know primarily LIHEAP and I think that's a question for this group to consider. Is this the kind of program where you're going to have to come in and try to get LIHEAP first before you can get arrears? And if so, then it seems like it is the kind of program which is probably best provided exclusively by the agencies. Because getting LIHEAP is going to be one of the needs or one of the prerequisites. And then the second thing that this brings up, and this is more of a direct response to your point, is they are going to be customers who don't have papers and who are at that lower income level but still are not eligible for LIHEAP. And I think for those customers it would be important to keep the program design as is.

Misty Velasquez

I agree, but that's why I said most of the people who would be coming in wouldn't really need this. But I agree that there are going to be some people who do.

Yochi Zakai

And do you think we should require folks to come in and try to get LIHEAP first?

Misty Velasquez

Oh, definitely. I think we need to utilize the LIHEAP program for everything that we can because in my opinion, all these programs are going to harm the federal program at some point.

Yochi Zakai

And that also goes to Chris's point about the total cost of the program. If we're requiring folks to come in for LIHEAP first, before getting this arrearage forgiveness, then we're ensuring that we're maximizing federal dollars instead of using ratepayer dollars.

Lorena Shah

I share the fear with Misty around maximizing the federal dollars and Yochi, I think in a perfect world it would be nice to have these AMPs exclusively delivered by the CAP agency. I don't think we have a sense of how many of those we would be getting on a regular basis, which makes it a little bit hard to commit to that, but I think that would be a worthy goal to have those come to the agency so that we can apply Federal funds, and Winter Help, if appropriate. And then looking at bringing the AMP in as the last piece of it. Many of our lowest income are going to be coming to us and so maybe they won't be using an AMP regularly, but I still think there's going to be times. I mean we have seen throughout this pandemic, we have thrown a lot of money through a lot of different programs that are arrears, and they are staying persistently high so. I do think these will be coming into play even for some of our lowest income folks who it appears shouldn't need it. But I think you're going to see that data seems to be showing when we look at arrears across the state landscapes, so I do definitely hear the argument for the higher income folks perhaps needing a bit more. I think its an interesting one to track over time. These numbers are adjustable over the years as we learn more, but they do definitely have more resources than our lowest income folks, even though I know we hear that they just can't be squeezed another dollar. Hopefully, by applying everything they are eligible for, the CAP agency will leave them with an AMP plan and the resulting payment agreement

plan that they can meet. I mean, we do know that clients all the time enter into payment agreements just to avoid disconnect today

Misty Velasquez

Exactly. That's what I am afraid is going to start happening.

Lorena Shah

I think with the approach that Dan talked about with their customer service reps, our own way of how we approach it, hopefully we can sort of get them into a payment plan that's going to work for them. But I do think the data is going to tell us the story. And just like Chris said, we'll see trend lines and we can adjust as needed.

Yochi Zakai

We're running out of time, but I wonder if we if folks want to have more discussion about the idea of requiring folks to go to the agency and get LIHEAP before receiving this arrearage program. Or, if that's something that we can come away with from this meeting as a decision point.

4. Topics for 5/17 Meeting – All

Mickelson, Christopher

I say we bring it up again at the next meeting or maybe towards the end of the next meeting. Just to kind of wrap that up, plus we can then talk about again the toggles and how these different average arrears calculations came into place. And the accounting deferral application, there was a question about a rate spread and the current rate spread in place that I reflect here, which is a base revenue is how the WEA program was initially set up. After that initial setup, from that point forward, it was an equal percent to all rates based off however much the program actually grew. So, I would say we will likely do that same approach for this program too. Maybe we can get consensus on that topic also.

Yochi Zakai

Chris, I would just repeat the request that we made earlier, that the description of the toggles be provided in writing. I found it really helpful when you did that write-up before and even after hearing it verbally a couple times, it's stuck once it came through in writing. If you wouldn't mind doing that as well, I'd appreciate it. It would be helpful to have it written for the proposal for the rate spread too.

Mickelson, Christopher

OK. I think Dan did indicate we have an agenda which is mostly going over everything we've talked about and after that, maybe we'll pick up some of these issues. Another thing I would ask everyone to think about is an actual name for the arrears management program and energy discount. We are running out of time between when we ultimately are trying to get these things filed and program set up so having a good name, we could start getting that taken care of for logo paper, flyers, notices, etc. Gives you something fun to do. Use family and friends.

Corey Dahl (PCU-he/him)

Before we go, Chris, I put an observation in the chat. We don't need to discuss it, but it might be worth considering. I'm wondering if the average arrearages estimated here are artificially low

compared to the full population of income-eligible customers. My thinking is that known low-income customers are those who have qualified for assistance and have received those dollars which would reduce bills and, thus, reduce how much would be in arrears. It can be folded into a future discussion.

Mickelson, Christopher

When you say artificially low, are you talking these 300 numbers you're seeing currently right here.

Corey Dahl (PCU-he/him)

Just that the arrearages among known low-income customers versus the overall population of income eligible customers. The best projection we can have based on available data might not be telling the full story just given the fact that we are looking at customers who have been served by some type of energy assistance program, which is how we know they're low-income customers, so I'm just concerned that this may not be displaying the full extent of arrearages among low-income customers that the numbers might actually be higher.

Mickelson, Christopher

That's part of the reason I reflect this current toggle earlier and so I'll try to explain how it was calculated and how we came to that. So hopefully that will answer your question. Alright, thank you everyone.

Yochi Zakai

An item for next week's agenda - since we're back with the big group, there was originally many months ago a discussion of Cascade using an algorithm to provide targeted arrearage forgiveness. I haven't heard anything about that in a couple of months and I was wondering if we might be able to add a status update on that.

Mickelson, Christopher

We should be able to provide a status. I do know our consultant got sick and then his father got sick, so that project got delayed probably a month or so from what we were originally proposing. But we could add some kind of update for that too. Alright, thank you.



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May 19, 2023

Ms. Amanda Maxwell
Executive Director and Secretary
Washington Utilities & Transportation Commission
621 Woodland Square Loop SE
Lacey, WA 98503

Regarding: UG-210755 Compliance Filing to Commission Request for Updates to Advisory Group Pursuant to Order 09

Dear Ms. Maxwell:

In compliance with Paragraph No. 78 of Order 09 in Docket No. UG-210755, Cascade Natural Gas Corporation ("Cascade") encloses for filing the WEAFF advisory meeting minutes. The following documents are submitted electronically as part of this filing:

- UG-210755-WEAF-Agenda-05-19-2023.pdf
- UG-210755-WEAF-CBO-Quarterly-Report-Template-05-19-2023.pdf
- UG-210755-WEAF-Arrear-Balance-Rate-Spread-and-Toggle-Explanation-05-19-2023.pdf
- UG-210755-WEAF-Overview-of-Small-Group-Agreements-05-19-2023.ppt

If you have any questions, please contact me at 509.734.4549.

Sincerely,

Christopher Mickelson

Christopher Mickelson
Manager, Regulatory Affairs
Cascade Natural Gas Corporation
8113 W. Grandridge Blvd.
Kennewick, WA 99336
Christopher.Mickelson@cngc.com

Attachment



WEAF Advisory Group Meeting
May 17, 2023 2:00 – 3:30pm Pacific

Welcome! Please sign in to record your attendance by adding your name and organization in the chat.

Advisory Group Member	Contact
Blue Mountain Action Council	Sylvia Schaefer
Community Action Connections	Dalia Ochoa
Community Action of Lewis, Mason, & Thurston Counties	Dale Lewis, Sandra Koch
Coastal Community Action Program	Debbie Gregg
Chelan-Douglas Community Action Council	Vern Gurnard, Kristi Hills, Alan Walker
Kitsap Community Resources	Kandi Balandran
Lower Columbia Community Action Center	Deanna Dahlberg, Kathy Bates
NW Community Action Center	Jose Alvarez, Todd Hilmes
OIC of Washington	Heidi Silva, Casandra Ochoa, Candi Jaeger
Opportunity Council	Marie Stangeland, Lorena Shah
Community Action of Skagit County	Misty Velasquez
Snohomish County Human Services Dept	Constance Hockett, Manu Morgan
WUTC Staff	Heather Moline, Andrew Roberts, Andy Sellards, Corey Cook
The Energy Project	Ross Quigley, Yochi Zakai
Public Counsel	Corey Dahl
NW Energy Coalition	Charlee Thompson
Department of Commerce	Michelle DeBell
Cascade Natural Gas	
Mark Chiles, VP of Regulatory Affairs & Customer Service	Lori Blattner, Dir Regulatory Affairs
Dan Tillis, Dir Customer Experience	Chris Mickelson, Mgr Regulatory Affairs
Teri Sovak, Mgr Customer Service, Credit & Collections	Noemi Ortiz, Mgr OR Conservation & Weatherization
Shannon Steed, Consumer Specialist	Jennifer Gross, Regulatory Analyst

1. Company Update – *Dan Tillis*

a. Forefront Economics Needs Assessment Study update

Tillis, Daniel

As a reminder, rather than taking a roll call like we've done historically we're just going to ask everyone to check into the chat with your attendance. The first topic on the agenda is the low-income propensity model that we had agreed to pursue; the last update was that we hired Forefront Economics to create that propensity model for us. You might recall that Mark Thompson from Forefront worked with a few others to create our low-income needs assessment last year. Mark sent us an update last week, so good timing for the question. The propensity model was going to be completed in April to early May; however, the data assessment and the matching took a little longer than expected so that delayed us by a few weeks, then his father got sick and he's the primary caretaker, and then Mark got sick, so those

two things combined caused about a month delay. Long story short, we expect to have the Washington report by early to mid-June, which is right around the corner. Once we get the propensity model from Mark, we'll share it with this larger group as soon as we're able to do so and work through any questions we have with Mark or any issues we experience as we're going through it. Our goal is twofold; one was to see if there are any customers identified in that group who maybe didn't get the Washington Commerce COVID dollar assistance late last year and we might want to provide arrearage relief proactively without the customer calling in, and then more long term is using the model to more effectively identify and conduct outreach to those households that are identified as high propensity to be low income or need assistance based on the model. Any questions or input on that topic?

Yochi Zakai

No questions, but since I made the request, I will say with The Energy Project we're looking forward to hopefully being able to get some customers some more arrearage relief based on what the model provides, so thank you.

b. Overview of Small Group Agreements presentation

Tillis, Daniel

You're welcome. Anything else before we move on to the 2nd and main topic of the day? The other agenda items are really about the new bill discount rate and arrear management plan that is under development by the company and in conjunction with the stakeholders in our small group meetings. I'm going to share this presentation, Jennifer Gross on our regulatory team primarily created this presentation as she's been tracking our minutes and our agreements in the small group. Late last year we started working on getting a bill discount rate in place and then agreed to create a subgroup of this advisory group to meet regularly. Initially it was once a month and then we quickly decided that wasn't going to be enough and so we meet once a week now with the focus almost entirely on the bill discount rate creation and the arrearage management plan creation. Today's presentation is to update this larger group on where we're at in those program design discussions and get any additional input from you on those decisions and or questions you might have. The majority of the presentation will center around the bill discount rate program because that's the part we started with first and then we've just recently gotten to the point on the bill discount rate program where we still have a lot to work out in the details, but the big blocks of the BDR are designed and now we've moved to the arrearage management program to design the big blocks. I'd say this will be about 80-90% on the BDR or bill discount rate and about 10% maybe 15% on the arrearage management program or AMP. I'll just jump into the slides; we worked together initially to establish some goals with the group, and this does not include all of those goals, but it has the major goals of the bill discount rate and arrearage management programs, and obviously, we all know we want to reduce energy burden, keep customers connected to, in this case, natural gas service and other utility service and increase participation in energy assistance programs. WEAFF has increased a ton this year, which is great, and we want to continue to increase participation. We want to have a data-driven evaluation and so we want to utilize data to analyze whether or not the programs are working or if we need to adjust, and we know we will adjust some things to supplement LIHEAP, obviously not replace it, and utilize ratepayer funds to supplement federal funds that customers might receive. And then our goal is to file by July 1st of this year to give plenty of time to get Commission approval and then implement with the new program year of October 1st, 2023. So, for the bill discount rate and AMP, the qualifications as far as the AMI and FPL go, will be exactly what WEAFF is now with having added AMI a few months ago to our WEAFF program. So, 80% for AMI and 200% for FPL, and of course, the number of folks in the household are in that calculation with income to get us to those AMI or FPL numbers. With the new programs, customers will be allowed to self-attest their household income and size to both Cascade or a Community Action agency for qualification. The

company agreed to utilize the current approach used for LIHEAP by the agencies where it's utilizing adjusted gross income, and I won't go into all the information below-- you all should be familiar with the types of income you accept and review, and then the gross deductions you apply to those income types to get to that adjusted gross income; so, the company will follow that same process for qualifying customers. And I should say, if you have any questions, you're welcome to raise your hand in Teams and I'll try to keep an eye on it and pause for questions. We will have plenty of time after we go through the slides to answer any questions you might have. Again, customers can apply through our Cascade customer service team, through a Community Action Agency, by completing an online form on cngc.com, or by requesting a paper form application over the phone or downloading one from our website and returning that hardcopy application. They might also receive that hardcopy application from an agency or CBO and return it as well. We have agreed that we will have a post-[GJ1]qualification income verification process where self-attestation is the main avenue that the company and the agencies will utilize unless they're applying for LIHEAP through an agency at the same time. But with self-attestation, we have decided we will select randomly 5% of all self-attested applications each month for income verification, and the company will provide those accounts to the agencies at the beginning of the month through the Assist Portal that you use today. The goal is to use the Assist Portal. I can't promise right now that we will absolutely have the Assist Portal ready by October 1, so if we don't, we'll have to determine if we delay starting the income verification process until that's ready or if we utilize some alternative spreadsheets to provide that data and get it back from the agencies. We did agree-- and I think it's a good goal to try to have an even distribution across the agencies on those accounts that are eligible for income verification each month-- we'll base that on the county and agency size to try to have that even distribution. Once an account is selected for income verification, the company will provide the initial notification to the customer, advising that they have been selected to verify income and then the agency will have 90 days to verify income for the customer. The customer will need to contact the agency to establish a way to verify their income and the agencies will also have four touch points within that 90-day period where they will attempt to contact customers who haven't reached out yet and verified income. It can be via a call, e-mail, or letter. There will be flexibility in there for the agencies. We will be providing account data that we have including customer e-mail for customers who have opted into energy assistance notifications from the company and agencies will be able to utilize those to attempt to contact customers as well. If after that 90-day period the customer has not responded or provided income verification, the agencies will disposition that verification case in the Assist Portal, advising the company of that non respondent and the company will send a letter to the customer notifying that they have been removed from the bill discount rate program and that their discount will be ending. It's a risk-free program, so the company will not charge back the discounts the customer has received up to that point and it also doesn't say here that there is a 30-day grace period in this window. So, if after 90 days the customer hasn't verified income, the agency will still notify the company that that's the case. The company will allow the discount to stay on the account for 30 more days and then remove it. That gives kind of an administrative buffer so that if the customer is delayed in responding, but they do respond in that window, which gives them a little bit more time. We're not going to tell the customer they have 120 days, but they do and we're still figuring out all the details on how that's going to work. We don't have all that lined up yet, but the customer will basically get the discount for at least 120 days even if they don't verify their income. Also, if they are removed after 120 days and then let's say on day 150, they contact the agency and they verify income, the company will add the discount back at the appropriate discount level and we'll retroactively provide the customer with a credit for any discounts they miss between that 120- and 180-day window. So, essentially, we know the customer was income verified; they just didn't take the action needed to verify their income and we're going to give them the benefit and credit during that time period they missed out on their discount. Agencies can verify income via alternate methods for customers who aren't responding to set

up some time to verify their income; an example would be if the agency has recently verified a customer for some other assistance like rental assistance, they could utilize that income documentation to verify customer's qualification. On the 90-day window, if a customer does verify their income during that time period, the agencies will also disposition the case in in the Assist Portal as income verified at current discount percentage, customer doesn't qualify, or income verified and new tier needed. The company will take the action needed to either remove the customer from the program if they didn't qualify or update their percent discount up or down depending on the new tier level that's required. If they never responded, we'll send a letter advising they've been removed for the program. If any other changes occur, we'll also send notification to the customer that something has changed and advise what has changed. We decided on five tiers, and FPL and AMI are both going to be used for qualification. Tier one is 0 to 20% FPL or 0 to 4% AMI and that's a 90% discount then 21% to 50% FPL and 5 to 12% AMI with a 71% discount. The top two tiers are the customers most in need, most energy burdened and, therefore, they receive significantly higher discounts. Tier 3 is 51% FPL to 100% and 13 to 24% AMI with a 40% discount. Tier 4 is 101 to 150% FPL and 15 to 36% AMI with a 15% discount and then Tier 5 is 151% to 200% FPL and 37 to 80% AMI with an 8% discount. All of these percent discounts are designed to reduce the customers energy burden in general to below 3%; that's all based on data and calculations to get to that number without LIHEAP being considered in in the calculation. We will auto enroll any customer who qualified for any WEAFF, LIHEAP or Winter Help during the current program year, which is October 1, 2022, through September 30th, 2023. For customers who qualified for WEAFF or Winter Help in conjunction with LIHEAP, and their FPL or AMI is submitted in the portal, we will auto enroll the customer in the correct tier. If a customer qualifies only for LIHEAP, we aren't always receiving the AMI or FPL, so we will send those accounts to the appropriate agency and ask them to give us the AMI & FPL. The agencies will have to calculate AMI & FPL if you haven't already and then send it back to us and we'll auto enroll the customer in the correct tier. If for some reason you don't have the income data for that customer, we know that their FPL was no greater than 150% FPL since they qualify for LIHEAP, so we will auto enroll those customers into Tier 4. We don't expect to have many of those since you're typically going to have their income and household size information. Those customers who were auto enrolled will receive a letter advising that they've been auto enrolled and into which tier they were auto enrolled, and the letter will also indicate to them if they feel like they might qualify for a different discount level to contact the company and we'll evaluate that. They can do that at any time. And in Oregon, where we already have a bill discount rate in place, we do have customers who do respond to those letters and give us updated information and enroll in a different tier. This is kind of a topic within the topic and through this process in the small groups, we also finalized all the details for our CBO outreach program. This is a topic we've discussed a few times in this larger group meeting and in early May we finalized all the details of the program for this year to get started. I'll share a document with you after we get through this presentation to cover a couple of other things. There are five agencies who have who opted into participating in the CBO program this year. Those agencies will contract with CBOs to help promote WEAFF to start with, because we've basically already started the CBO program and then ultimately starting in the late part of this year, the BDR and AMP programs. The funding for the first year is \$73,000 spread out based on agency size and CNG account population in those areas. After this year it will be up to 5% of the WEAFF annual budget every year thereafter and we'll provide that budget at the beginning of each program year. The last thing is we are asking agencies to provide quarterly reporting. Lorena shared a template that they've used for their CBOs for the Emergency Rental Assistance program, and we modified that for the purpose of the CBO program. At least to start with, I'm sure it'll be a living, breathing, evolving document that we will continue to develop and I'll share that template as well when we get to the specific CBO topic, and we'll get through some terms and conditions. Transitioning a little bit to AMP for a minute, we did decide that we would eliminate WEAFF as it exists today, with LIHEAP and Winter Help continuing as the energy assistance programs, in addition to the new BDR and AMP.

Essentially the BDR will replace WEAFF, but as far as arrearage assistance with past due balance, AMP will serve that purpose. A customer may only self-certify once during the program year so if they self-certify with the company or the agency in October and then they call back in December to self-certify again, they'll go through an income verification process because they can't self-certify again. If they contact the company, the company will refer that customer to their local agency to go through the income verification qualification process. Customers aren't required to report a change in income, but they may voluntarily do so. If a customer's income goes up and they want to report that because they feel like they shouldn't get the same level of discount, then they can do that, and we'll get them into a new tier. If their income goes down, we hope they would report that and get into a higher discount tier, but they're not required to do it either way. The term of the discount will be 24 months and that term will restart with each application or assistance grant so if a customer qualifies for a bill discount rate, and they don't contact us again for 24 months, their discount will last two years. If they contact us the next year to qualify for a discount or an AMP or Winter Help, then their discount will start over for another 24-month term. So anytime the customer qualifies for LIHEAP or other assistance they will reset their 24-month term discount essentially. We had some discussion on whether or not there should be any special provisions for medically fragile customers and decided because it's a bit of a gray area and difficult to develop those special provisions and identify those medically fragile customers and how to handle them, that we would start the program initially without any special provisions for those customers. Continuing with terms or agreements with the agencies, the company will ask customers to voluntarily provide demographic data and when they do voluntarily provide that demographic data, we will provide that to the agencies monthly and that can be utilized for various reasons, including helping you understand the customer before you try to contact them for income verification; the table on the right includes all of the different demographic questions we've agreed to ask and the values for those that we still have, some under development as far as the values go. We haven't decided exactly what to list for preferred language. We need to figure out what we believe we should include in there, but I'll spend a little bit more time on this slide so that you all can look through those items. One important point here is that when we qualify customers for the bill discount rate program and we ask them the voluntary demographic questions, we will share with the customer that by participating in the program, they are opting into the company providing their account information, as well as any voluntary demographic data, to the agencies and if a customer does not agree to that, then they won't be able to participate in the bill discount rate program. If they do agree and they participate, then we'll provide the data. Misty asked are we asking for monthly or yearly gross income? That one has changed since we put this together, we changed to monthly Misty, so we'll need to update this. And Jenn, we don't really have an application that a customer completes to apply for the bill discount rate internally when they apply with the company. This data will be placed into the Assist Portal and that's how it will be provided to you on a monthly basis so when you when you receive that data, if that account qualified or was selected for income verification, then this data will be there for you to view while you're working with that customer. Or if you're just looking at the accounts to determine if they qualify for the bill discount rate but they haven't received LIHEAP and you want to contact them to see if they participate in the LIHEAP program, then you'll have that data available as well before you try to contact that customer for other assistance purposes. It will be tied to the account in the Assist Portal. Yochi made a point that the agencies can continue to use the one-month, three-month, twelve-month income clock qualifying method. Actually, the company agreed to do that as well. We didn't call that out here, but one of our agreements is that we'll start with one month and, if the customer doesn't qualify, we'll go to three and if they don't qualify, we'll go to 12. If the customer doesn't have 3 or 12 months available, they'll need to call the company back or qualify through the agency. We won't be able to wait for an extended period of time for the customer to go find that information. They'll have options to reach back out to us, or the agency.

Misty Velasquez Community Action of Skagit

You said there was no application. Since they're self-attesting their income, will there be any signatures required on anything?

Tillis, Daniel

No, we record all of our calls and keep those for a year, and so they're verbally allowing sharing of their account information.

Misty Velasquez Community Action of Skagit

So clients are only going to be going through Cascade to get approved for BDR?

Tillis, Daniel

No, they'll go through the agencies for BDR as well.

Misty Velasquez Community Action of Skagit

We don't record our calls to get all of that. I think we should have some kind of application, and I thought we had discussed this, and we were going to come up with a paper application of some sort.

Tillis, Daniel

Well, we did agree to have a paper application and if you all want to use that, you're welcome to use that. I don't know how you would get a customer to sign that though if they're on the phone with you and qualifying via self-attestation.

Misty Velasquez Community Action of Skagit

We would have a script to read to them and then taking a verbal signature over the phone from them. The script would let them know what they're saying is true.

Tillis, Daniel

I think I understand what you're saying. I don't think we've talked about that yet. And so, it may be something we need to discuss more. Today, we don't do that in Oregon, where customers can qualify via self-attestation, both through the company and the agencies. I don't know if the Oregon agencies are doing something like that or not, but we can certainly talk about how we want to handle that. If anybody else who's in the small group meetings has an opinion on that or thinks we talked about it and decided on and we missed, feel free to jump in here. But it sounds like something we may need to discuss more.

Yochi Zakai

It's one of those things we can discuss if it should be a Cascade requirement, but it might be the kind of thing that we allow agency discretion because some agencies might want something more formal. Other agencies might be OK having a more informal verbal signature. We should think about if there's a need to formalize a requirement around that or not.

Tillis, Daniel

Jennifer Gross, can you please add that to our list of items that we need to discuss more? I appreciate the comments in chat. That probably gave everybody time to look through the data some more as well. We will apply and expend LIHEAP funds before applying the bill discount, and so we know that sometimes LIHEAP pledges will create a credit balance on an account and we're working to put in

mechanisms to not apply a bill discount until that credit has been completely used and the customer starts having a bill amount due so that we maximize the use of federal funds before we utilize any ratepayer funds. We learned that you all utilize the usage data today to calculate LIHEAP and so we'll provide both the pre- and post-bill discount energy usage and bill amount data for you to utilize for that purpose. I already talked about utilizing the Assist Portal for post income verification. Again, I can't 100% commit it will be ready by October 1, but we're doing what we can, and we'll figure it out if it's not. We talked about whether or not fixed income customers should have an extended term beyond the 24 months, but we decided that we'd start with every customer, fixed or non-fixed income, will have a 24-month term. When customers are nearing the end of the 24-month term, the company will communicate with customers that they are near the end of the term and that they'll need to reapply if they feel that their discount should continue. We're going to have an annual report that will replace the WEAf annual report, and we have not determined all of the KPI's or metrics that will need to be included in that report yet. One thing we did decide based on prior discussions is whether or not fixed income customer should have a longer term. The annual reporting will include the number of customers with a fixed income or disability status, the percentage of those customers who reapplied into the 24-month term and the number of customers who contacted the agency to inquire about other social services. That will require some partnership with the agencies to get us some of that data, whether or not a customer is disabled or not is a voluntary question, so we won't have that data for every customer. We've agreed to work on a joint communication plan with all of the stakeholders involved in the development of the programs and with the agencies. This next one is a key decision, for the arrearage management program, a traditional program called an arrearage management program forgives a certain amount of an arrearage over a period of 12 months, with 1/12th of that forgiveness occurring every month as long as the customer makes their percentage of the past due amount that's not forgiven over that 12-month period on time and regularly, in addition to their normal bill each month. The company proposed trying something different and forgiving all the arrearage amounts up front. We haven't decided on the percentages for each tier yet. Hopefully we'll decide that next week. We have to make sure everybody's still on board with this approach. When we do forgive that, for the bottom 2 tiers--50% FPL or 20% AMI--I think it is the equivalent or below, those customers will get 100% arrears forgiveness. We haven't determined the percent forgiveness for tiers 3 through 5 yet; that's still TBD. When those customers in tiers 3 through 5 receive the arrearage forgiveness, the company will also proactively offer those customers a time payment arrangement up to 18 months, as the initial thought that hasn't been finalized yet, but that's the current plan and is not 100% final. Some items we've added to a list is program evaluation items. In a couple of years--we'll determine the right time period to ask these questions. Back to the medically fragile customer question of whether or not we should have special provisions for those customers, we want to evaluate that and how that's going for those customers in the future, so we can decide if they should have special provisions of some sort. That is the same with fixed income customers, is 24 months the right term period or should it be longer? We want to determine if hardcopy applications are being used by someone other than maybe the agencies with the CBOs or are they actually being requested by customers from the company or being downloaded from our website by customers. And then the arrearage forgiveness that I just shared on the AMP, is that upfront forgiveness working effectively compared to what PSE and others are going to do without 12 months? Which one is working better and does Cascade need to change their approach to that? Other things we still need to discuss are the program name, and if we want to have an overall umbrella name for the two programs, BDR and AMP together, the percentages of arrears forgiveness for those tiers 3 through 5, as I mentioned, if LIHEAP is a prerequisite for arrears forgiveness. In the last meeting there were some discussions on whether or not a customer should be required to go through an agency first to see if they qualify for LIHEAP before they're qualified for the AMP program. We need to continue that discussion if an agency qualifies a customer for LIHEAP and the bill discount or AMP programs at

the same time. LIHEAP requires income verification; BDR and AMP do not, so how are the agencies going to handle that? We have to determine Cascade's payment arrangement, payment plan programs, how we discuss that with customers, how it's shared with them when they are self-serving either on our IVR or our website and creating a time payment arrangement. I can tell you based on our meeting from last week and in conversations I've had since then, we will be updating our IVR to advise customers of a longer-term payment being available if they speak to an agent, or energy assistance being available if they speak to an agent rather than self-serving on the IVR for the pay plan. I want to share that verbiage with the small group before we submit those changes but it shouldn't be any issue getting that made well ahead of this program you're starting. We haven't talked about agency fees at all as far as income verification process goes. We haven't worked out all the marketing outreach for the program or the details of the joint communication plan. We have not finalized how we'll recover costs for the program. Chris actually sent out a document today that helps address some questions around that and then we have to finalize all the KPI key performance indicators and reporting details and the interval for those as well, in addition to the annual report that will replace the WEAf annual report. That's it for the information to share on the bill discount rate, BDR and AMP. We'll pause here for a few minutes to see if anybody has any questions or feedback on what we've decided so far. Ok, nothing.

[GJ2]

c. CBO Program Update

Tillis, Daniel

I am going to now go to the CBO document very briefly. I think most of what's in here, we just talked about, but I just want to make sure this group has all the information and I want to share the notes that went out after we made the CBO decisions so that you see exactly what we decided. We listed the official program start date as May 1st. We recognize that each agency will get started at a different time and at a different rate of adoption. These decisions by the way, were all finalized on April 19th in our small group meeting. These are the five agencies who have opted in for this year and I just approved invoices today so each of those agencies should start receiving their CBO funding within the next week or so. It will be with your normal agency fee payments; you can see that the \$73,000 was in the 22-23 program year and was split across the agencies by the CNG customer count in those areas. Those agencies will receive those funds to work with CBOs in their area in any way they see as appropriate, providing reporting quarterly on their activity, successes and needs. The agencies have the flexibility to use the funds however they see is the best use of the funds. Thanks again to Lorena for sharing this and just some basic information up here about the program. In this case, the agencies will complete these, not the CBO. Several questions are free flow answers. Obviously, we want good data, information, and feedback on how things are going, which CBO did you partner with, most recent quarter to promote WEAf--in this case, will update this for the new program year and to reflect BDR and AMP as the new programs. We also need to know what funds were provided to each CBO during the quarter and what those were used for, so outreach or staffing, events, the cost for printing, food, things like that. Examples of outreach conducted by the CBO, did they conduct workshops, have meetings, some language information in there, if there was some success or activity around outreach to customers who speak a different language as the primary language, success the CBO had connecting people to energy assistance. I'll just say during the quarter, include any data available; if a CBO can say we were able to connect with these fifty people at this workshop and we handed out 28 Flyers, that'd be great to know. Insight into the community served during the quarter, demographics, underserved communities reached, feedback provided from any groups or organizations that could be helpful; and then what additional help or resources does the agency need to improve or enhance CBO outreach? How do we keep making the

CBO program better; it's going to be critical information we get back. The best way they see fit to spend those funds and reporting will really help us understand what's working well and share across the agencies and with the Commission at some point on how the program is working. Any questions on the CBO program at all? As we get closer to the new program year, we'll update on the funding amount for the 23-24 program year and ask if the five agencies who are opted in would like to stay in the program and ask if any other agencies would like to opt in as well.

2. Rate Spread – *Chris Mickelson*

a. Reviewing the written description provided by request

Mickelson, Christopher

I'll ask if people had time to read that document I sent out.

Yochi Zakai

I did get a chance to read that, and I think that it probably makes sense for us to continue using the same spread as is currently used for the WEAf program because this is replacing the WEAf program and should be providing similar benefits. So, it makes sense to recover the costs in a similar way. Thanks.

Mickelson, Christopher

OK. Did anyone have any questions on the model? There are 4 different rate spread options, but I guess if we have consensus on just going with our current rate spread application similar to WEAf then maybe that portion of the discussions is already done, but figured I'd ask if there are any questions on the other toggles and what they meant. I did provide an explanation of each of the toggles and what they did.

Yochi Zakai

I think the other parties that are most likely to be interested in rate spread would be Public Council and Commission Staff. So, I don't think we should say we have consensus until we've heard that those parties have actually had a chance to think about it. I was lucky that I had time today between when you sent it out and this meeting, but that's not always the case for me.

Corey Dahl (PCU-he/him)

I haven't had a chance to dive deeper into that since you sent that out earlier today. I'll do that and obviously have to consult with our attorneys as well, since that's a bigger issue outside simply the scope of this program makes sense.

Cook, Corey (UTC)

My sentiments are essentially going to echo Corey Dahl's. I haven't had a chance to look through anything that's been sent out yet, regrettably.

Mickelson, Christopher

Alright. Do you think you'll have time and be able to come back next week to talk about that and hopefully try to come to some type of agreement.

Corey Dahl (PCU-he/him)

I should have time between now and next week's meeting.

Cook, Corey (UTC)

So right now, me and Heather Moline, my supervisor, are both in a rate training all week, so I won't have

any opportunity to look at it until Monday at the absolute earliest. I'd say that two weeks from now would be the earliest I can guarantee.

Mickelson, Christopher

OK. Keep in mind we are trying to meet that July 1st filing deadline so having some of these issues keep lingering closer and closer to that deadline could create other hang ups or issues, so just putting that out there, but sounds good.

Tillis, Daniel

I did check by the way we have six small group meetings left before the 1st week of July. So, if we're trying to file by that first week, we have six, maybe 7 if we file by the end of that first week of July.

Mickelson, Christopher

Alright, well I guess the last item would be the arrear balances and the two different tools to analyze the data. There was a percentage method and then an average method and this kind of went back to your question, Corey, at our last small group, but considering you may not have had a chance to read that we can always maybe postpone that discussion until next week. I don't think I have much more to share related to rate spread or arrear balance.

3. Continuation of Arrearage Management program design – *All*
a. LIHEAP Prerequisite

Tillis, Daniel

Thanks Chris. Does anyone have any questions on the document Chris sent? I would encourage you to read through that document and if you have any questions, go ahead and reply all to the e-mail to ask. And if you feel like you don't want to reply to all, then certainly reply to Chris at least and ask to get clarification and if he feels like the group could benefit from the answer, then he can share it with the group as well. We don't need to necessarily wait until another meeting to get some of those questions answered. The last item that was on the agenda is a continuation of the arrearage management program design and specifically that LIHEAP prerequisite. This came up again the last 20-30 minutes of the last week's meeting and I wasn't on it but my understanding from our Cascade team is that there was an ask to add it to this week's agenda. I don't know if Yochi or others wanted the full group to stay on for that discussion or if you wanted to give the option to stay on or drop if they want to. We can spend our last half hour together on requiring a customer to go through an agency for LIHEAP qualification before they could potentially be eligible for AMP.

Yochi Zakai

We can't force anyone to stay on a call at any time so if anybody wants to drop off, you're obviously welcome to. But as Dan said that the discussion is really going to be about the arrearage forgiveness program requirement, which would also mean requiring the arrearage plan to go through the agency if the customer hasn't gotten LIHEAP yet. One of TEPs goals in designing the program is to make sure that we're fully utilizing the federal dollars that are available before we're utilizing ratepayer dollars. We acknowledge that expanding assistance is going to expand the number of ratepayer dollars that are going to be necessary to run the program. But that being said, we should still try to use all the federal dollars where that's available. I don't think it makes sense to require customers to have received LIHEAP because I want to make sure that customers who aren't eligible, either because of their citizenship status or because they are over income, that they can still receive arrearage forgiveness. But I think it does make sense to have customers who would qualify for LIHEAP to be required to apply first before

getting the arrearage forgiveness through the rate payer funded program. So that's kind of my thoughts and hopefully that's good to recap and let folks know at least where the energy project is coming from.

Tillis, Daniel

I've given it some thought since last week. I read through the minutes and then asked the team for some clarification on some context, and I totally understand the thought process of that. To me it is the most effective way to make sure we're maximizing LIHEAP before we use rate payer funds for AMP. The only concerns I have are it reduces the number of resources available to qualify customers for AMP and so by taking the company out of the AMP qualification process for the customer, because we can't qualify customers for LIHEAP, you're essentially taking 30-40 resources out of the qualification process and then the 40 resources, and I'm giving you an estimated number, would be able to qualify customers for BDR, but if customer has a past due balance while they're qualifying them for BDR, they wouldn't be able to help them with that, except for maybe set them up on a TPA in the meantime and refer them to an agency. I don't know if that's a bad process; it doesn't feel quite as efficient as if they could qualify them for both at the same time. So, I'm not opposed to the customer being required to go through the agency to make sure we maximize LIHEAP before an AMP. Those are the challenges I see with it. I would absolutely prefer to maximize LIHEAP before rate payer funds for sure.

Corey Dahl (PCU-he/him)

I agree with both Dan and Yochi that it's important to prioritize funded dollars when and where we can. A couple of thoughts and concerns and these aren't necessarily concerns that would sway my opinion in terms of supporting this requirement or not but definitely some logistical things to consider. The first is including this requirement, which would obviously require income verification would it create a barrier that we're trying to eliminate? Essentially the primary goal of self-attestation is obviously to expedite the process of enrollment and reduce barriers to enrollment for customers. The other question I have is, would this put customers potentially in a situation where they would have to disclose their immigration status unintentionally and would that be potentially a deterrent to applying for those customers?

Tillis, Daniel

I can try to address the barrier question. I'm not sure I'm the right person to try to address the citizenship part, but barrier for the customer, if you call the company and you have a past due balance, we will typically get into a conversation about your options and that includes a BDR for future help. But if we could qualify for AMP, then they would also include a discussion about potentially helping with your past due balance, or part of it, depending on the income level and then take care of both of those at the same time and refer the customer to the agencies for other assistance. I do think if the process becomes qualifying for BDR based on self-attestation for discount starting with your next bill cycle and I can also give you your local agency information to contact for possible help with your past due balance, then you're asking that individual to take one additional step to get help, so I think that could be seen as a barrier, yes.

Misty Velasquez Community Action of Skagit

I can see it as a barrier contacting the agency because, for one, with LIHEAP, they're going to be scheduling an appointment, so it's not an immediate pledge right away. They'll have to come in for an appointment to show their income if they qualify for LIHEAP. But here's a question: if you were to set them up on an AMP and the client came in and got LIHEAP from us, would you be able to take them off of that AMP and then have LIHEAP cover whatever arrearages because I can see them calling you getting set up for an AMP or something along those lines? They get signed up for their BDR, they come to us to get energy assistance a couple of months down the line, and we give them LIHEAP. How does that all

work out? Or is that just going to go forward and they're still responsible for their portion of their past due amount if it didn't get 100% waived.

Yochi Zakai

I think that's the kind of key thing that I feel like if we're accepting the AMP it's going to provide arrearage forgiveness as a grant and not kind of 1/12th along the way. It seems like it would be a very complicated process for the company to say we're going to take that forgiveness that was applied in the past and switch that from ratepayer funding to federal funding to the extent the LIHEAP grant covers all of that or more, and then additionally, even if the company did figure out technically how to do that, wouldn't the customer incentive for getting LIHEAP go away because the customer would have already gotten the grant up front, especially for those receiving 100% forgiveness.

Misty Velasquez Community Action of Skagit

I agree with that. I also want to say on top of that, if they do come in, they call you; they come in; you've set them up on a BDR;, are you going to stop that BDR because we're going to give them a LIHEAP grant? And then their LIHEAP grant has to end before the BDR will pick up?

Tillis, Daniel

I think you could potentially have that issue regardless of what we decide, because you could give them a LIHEAP grant that's large enough to take care of their arrears and give them a credit balance, right?

Misty Velasquez Community Action of Skagit

True, they could get up to \$1000.

Tillis, Daniel

And that's part of our internal challenge with our systems of trying to use those LIHEAP funds before BDR is applied; if it creates a credit balance. it's a difficult thing for us to do our systems and our IT folks.

Misty Velasquez Community Action of Skagit

If somebody is put on a BDR and they're given a LIHEAP grant, why can't that LIHEAP grant just cover their payment that they are supposed to make until it's gone and not take them off of the BDR?

Tillis, Daniel

That's a good question. I don't know. Teri, do you know the answer to that question? It could be something we could present as an option of how to do it to our IT team that I'm not sure they've thought about. I think our IT team is trying to figure out how they cannot allow the BDR to happen as long as the account has a LIHEAP credit on it, which is the opposite of what you just said. Any thoughts on that, Teri?

Sovak, Teri

I think they were going down that path because we asked them to. Now we're saying they could still receive a discount so that the amount billed was less, but it would be covered by their LIHEAP credit. Is that what Misty's asking?

Misty Velasquez Community Action of Skagit

Yes. Why are we not thinking about just letting the LIHEAP grant cover the client's portion of their BDR payment until it runs out? It would take care of their arrearage. The client wouldn't have to make a payment until they're LIHEAP grant ran out.

Tillis, Daniel

I think the reason we weren't doing that is because we were following the ask to follow the Avista approach of allowing a regular bill amount without a discount to eliminate all of the LIHEAP funds, including any that create a credit on the account before any ratepayer funded bill discount rate is applied.

Sovak, Teri

Dan, does the discount get charged back to the program?

Tillis, Daniel

Yes, it's part of the ratepayer funds that would fund both the discount and the arrearage management program.

Yochi Zakai

I think I can just explain again why I think it's important to apply the LIHEAP funds first before the bill discount and that is the same reason of maximizing the federal funds, right? So obviously LIHEAP would first take care of any arrearages on the account and then after that, if there's a credit, to me it makes sense, in order to maximize the use of federal funding so we're not using ratepayer dollars, have everything covered by LIHEAP first and then once that runs out, then have the discount program use ratepayer funds to provide additional assistance. And the thinking that I have is if a customer qualifies for LIHEAP and they do end up with a little bit of credit on their account, then their energy burden would actually end up being a little bit lower than what our target is because for a month or three months or however long they would get a full credit on their bill rather than a partial credit. But, if we do it the other way and allow the LIHEAP to be applied after the bill discount rate, we're actually reducing the customers energy burden to lower than our target of 3% and I think also risk trading what would have been federal funding for ratepayer funding.

Misty Velasquez Community Action of Skagit

I get that Yochi. My only concern is we see LIHEAP clients all year long and they are obviously going to call and sign up for BDR all year long, but they may come in and that's going to be a lot of manual work for Cascade to put someone on the BDR, then take them off of a BDR when they get their LIHEAP grant and then put them back on a BDR after their LIHEAP grant has ended. I want to utilize LIHEAP to the fullest, but if we are creating all of these programs for clients to use and right now clients are not having to make a payment each month because the LIHEAP covers their payment every month, right? It's a lot of work, I understand where you're coming from, and utilizing it first before utilizing ratepayer funds and I agree with that 100%, but I can see there's a lot of room for error unless there's a computer program that stops it, turns it back on, stops it, and turns it back on.

Yochi Zakai

I am open to reevaluating when we have data on how this actually looks, but the reason why I feel like it's important to start this way is at the end of the day lowering costs for ratepayers, assuming the amount of work is less than the cost, which I am fairly confident it will be, but I guess I don't have data to support that, so I will always be open to reevaluating with data. But again, the impact is the reason why I think it's worth asking, because at the end of the day the benefit to rate payers who many of which are moderate income or low income, who have not actually asked for help.

Misty Velasquez Community Action of Skagit

Jen has a good point as well on the chat. She asked, would CNG apply the LIHEAP based on the pledge or based on when the payment for the pledge is received, because that can be at a very long period of time in between the pledge and the payment?

Tillis, Daniel

I'm sorry. Can you ask that again?

Jen Rightsell

Does CNG apply the LIHEAP pledge based on when we make the pledge onto the account or when the payment for that pledge is received? It could be up to six weeks to two months for that to possibly happen.

Steed, Shannon

We note on the account that we're expecting a LIHEAP payment because we've received a pledge, but we can't apply any sort of payment until we receive it from the agency, so there can be a delay. Like Jen said, the time could vary depending on the agency and how they work internally.

Lorena Shah

Even if Cascade continues with their current policy, which it sounds like you'll have to, which is when you get payment, they'll still already be on a BDR, so we'll continue to receive the benefit of that until the payment is made or we'll have to process an application, so they'll go on the BDR and then there'll be an adjustment once the payment is made. I don't feel like the client is really losing out by being delayed by the payment because they'll receive the BDR until that payment is received.

Tillis, Daniel

There are a few scenarios, the interaction between LIHEAP and the BDR, when an agency approves a customer for a BDR and LIHEAP at the same time. Then when we receive that through the portal, we would immediately apply the BDR and then once we receive funding for LIHEAP, then it sounds like we would apply that payment to the account. If it doesn't create a credit balance, the customer continues to get the BDR. If it creates a credit balance, then we have to essentially stop it and then restart it once they have a debit balance again. You might have the same scenario next year when the customer gets LIHEAP again, and then if the company qualifies a customer for BDR and then that customer is referred to or contacted by an agency for LIHEAP, you'd have a similar scenario. So, to your point, it's very complex for us. Now our IT team would do backflips and cartwheels if we told them we did not have to take that approach and that we could just let the BDR stay on the account regardless of LIHEAP or not LIHEAP, credit or not. But it sounds like Yochi wants to stick with that decision we made previously where we're not going to allow BDR to apply to the account anytime there's a credit on the account that was created by a LIHEAP pledge.

Misty Velasquez Community Action of Skagit

So there could be essentially a period of time where a client's only going to be on the BDR for maybe three months because the LIHEAP grant could potentially take care of 3/4 of a year for them.

Tillis, Daniel

Right. We're running out of time, and this is taking us down a different path that I didn't think we were going to go down but it's a good conversation. One of the counter arguments to not applying the BDR when a customer is getting a LIHEAP grant that provided them with a credit balance is that it probably

means they have very low income and high bills. They're not getting the same opportunity for that LIHEAP or that BDR discount as they would otherwise if you just apply it to the account and it maybe isn't lasting as long.

Misty Velasquez Community Action of Skagit
Which is a deterrent for them to apply for LIHEAP.

Tillis, Daniel

Sounds like it could be. We might want to revisit that conversation in our next meeting as well. Next Wednesday's small group meeting we have the AMP discussion and whether or not the customer should be required to apply for LIHEAP first. Again, I'm OK with that approach and I understand the reasoning for it. I think one option that we could have is that if the customer's applying for BDR through the company and they have an arrears balance, we could automatically offer them a TPA, which we would typically do anyways. We get them set up on the TPA and tell them to go to their agency to see if they qualify for LIHEAP or AMP. You can apply LIHEAP and try to figure out what we do with those funds combined. For our next meeting, I think we probably need to lay out our options on how we would handle that if we required a LIHEAP application to see if a customer qualifies for that before they can apply for AMP. We will probably have 3 different options: one of those is not having that requirement and just talk through that and hopefully decide in that small group meeting. We have the percentage discount for tiers 3 through 5 or percentage forgiveness for tiers 3 through 5 and then if we have time revisit the BDR approach as far as LIHEAP funds first or not if there is a credit balance, whether or not we allow the BDR discount to trigger and apply to the current month's charges. I hope this was helpful as far as an update for those of you who have not been involved in the small group meetings, we'll plan to do this again in June. This really means we have five small group meetings left because we'd like to do this again before we file. Again, we plan to file in early July, hopefully by July 1st, for both BDR and AMP. And if you have any questions at any point or if you want to join the small group discussions, you're more than welcome to; just let us know. Thanks everyone. Have a great rest of your day.

Arrear Balance, Rate Spread, and Toggles Explanation

This document provides an explanation of the two methods Cascade used to calculate arrear balances in the model, along with Cascade's proposal for the recovery of program costs. Additionally, it includes a short description of each toggle within the model.

Arrear Balance

Cascade proposes using the "average" toggle to calculate the arrear balances for the program, instead of using a percentage basis. The two methods available are "percentage" and "average," both of which utilize historical data related to low-income individuals. The percentage method calculates the average arrear level forgiven during COVID, based on all Big HEART data applicable to customers at 200% of the Federal Poverty Level (6,221 customers). On the other hand, the average method takes the arrear balances from the Weatherization Energy Assistance Funding Program (WEAF) and Low-Income Home Energy Assistance Program (LIHEAP) for recipients (2,208 customers) and calculates the average past due balance.

Rate Spread

Cascade proposes using the same methodology currently used by WEAF. The initial rate spread used by WEAF has costs allocated based on customer class base revenue from the most recent general rate case. This allocation is controlled by the "Base Rev" toggle for the "RD Spread" indicator. This approach ensures that the program is allocated proportionally to each customer class. The allocation is then converted to a rate on a cost per therm basis using the annual therm usage for each customer class. After the initial implementation, annual program true-ups will be calculated as an equal percentage applied to all rates (cost per therm) based on the increase or decrease in the program's amount and percentage from the previous year.

Toggles

1. *Arrearage Frequency: An input field that represents the frequency at which recipients receive arrearage grants.*
2. *Enrollment Level: An input field that represents the level of participation within the program relative to the total number of eligible low-income recipients in the company's service area.*
3. *Assistance Received: A drop-down field that represents the average assistance provided to account holders, indicating the energy burden after receiving assistance.*
4. *Percentage Type: A drop-down field that switches the underlying data between income percentages, such as the Federal Poverty Level (FPL), Area Median Income (AMI), the greater of FPL or AMI (MAX), or the Avista approach of FPL for all tiers with AMI on the last tier (AVA).*
5. *Agency Fee: An input field that specifies the amount the agency receives for signing up a new recipient account into the program.*
6. *CBO Funding %: An input field that represents the percentage of funding community-based organizations receive based on arrearage management costs.*
7. *CBO Funding \$ (min): An input field that specifies the minimum amount of funds to be distributed to community-based organizations to increase program participation.*
8. *RD Spread: A drop-down field that switches between different types of rate spreads and allocation methods. This includes options such as allocating to residential only, applying an equal percentage, allocating based on customer count in each class, allocating based on therms in each class, allocating based on base revenues from the last general rate case for each class, allocating based on the cost of service results from the last general rate case, and an open field to create a custom allocator for each class.*
9. *Verification Fee: An input field that determines the amount the agency receives for verifying a self-certified recipient account.*
10. *Arrearage Mgmt: A drop-down field that switches between having an arrearage management program or not.*

WA Community Action Agency Quarterly Report to Cascade Natural Gas
CBO WEAFF Outreach Services

Please send to: shannon.steed@mdu.com

Organization:

Completed by:

Quarterly Period:

Jul/Aug/Sept 2023 (Due Oct 15, 2023)

Oct/Nov/Dec 2023 (Due Jan 15, 2024)

Jan/Feb/Mar 2024 (Due April 15, 2024)

Apr/May/June 2023 (Due July 15, 2023)

What CBOs did you partner with in the reporting quarter for the promotion of WEAFF?

Please list the WEAFF funds provided to each CBO for the reporting quarter. Please include the purpose/use of the funds – e.g., Outreach/Staffing, Event Cost, Printing, Food/Meals, etc.

Briefly describe examples of outreach activities conducted by the CBOs during the reporting quarter. – e.g., Workshops, Mailers, Meetings, etc. (in what languages?)

Briefly describe any successes the CBOs had connecting people to WEAFF during the reporting quarter, including any data available on the number of referrals.

Please provide any insight available into communities served by the CBOs during the quarter funds – e.g., Demographics reached, Strategies tried and results, Feedback provided, etc.

What additional help/resources do you need to enhance or improve CBO outreach?

Bill Discount Rate and Arrearage Management Program

Program Parameters from the WEAFF Small Group

Program Goals



Program Eligibility

gross income does not exceed 80% of Area Median Income (AMI) or 200% Federal adjusted Poverty Level (FPL), adjusted for number of occupants in the household.

Gross Income Type	Types of Income	Gross Deduction
Fixed Income, not taxed	SSA, SSDI, SSI, Pension, Unemployment, VA	0%
Fixed income, taxed	SSA, SSDI, Pension, Unemployment	10%
Earned Income, taxed	Regular earnings from a job	20%
Self-Employment	1040 or Any type of self-employment that has costs associated with it	50%
Other Cash Income	TANF, Child Support	0%

Applying



Post-Qualification Income Verification

- The goal will be to have an even distribution across agencies based on the county's/agency's size.
- Cascade will send a letter or email notifying the customer of the income verification process.
- The Agency will attempt to verify income for 90 days, sending the customer up to four communications.
- If after 90 days the customer has not verified income, Cascade will send a letter to notify the customer that service on the discount will be discontinued.
- If a customer verifies income within two months of being removed from the program (within 180 days of service initiation), a discount will be applied retroactively.
- Agencies may use alternate methods to verify income for non-responsive individuals.
- Enrolled customers who do not verify income will not be required to pay back discounts.

Bill Discount Rate

Income Tier Level			
Tier	FPL	AMI	Energy Discount
1	0-20%	0-4%	90%
2	21-50%	5-12%	71%
3	51-100%	13-24%	40%
4	101-150%	15-36%	15%
5	151-200%	37-80%	8%

Auto-Enrollment

- Cascade will auto-enroll all customers who received WEAFF, LIHEAP, or Winter Help in the prior program year.
 - Assist Portal data and Agency data (LIHEAP) will be used to enroll customers into the correct tier.
 - When FPL/AMI data is not available for customers who only qualified for LIHEAP, the Company will auto-enroll customers into Tier 4.
 - Auto-enrolled customers may provide income information to qualify for a more discounted tier.

Community Based Organizations

- Agencies will contract with Community Based Organizations (CBOs) to improve outreach to all customers for a pilot period of three years (Oct. 1, 2023, through Sept. 30, 2026).
- Funding for CBOs—\$73K in the first year and up to 5% of the WEAFF annual budget each year thereafter—will be provided to agencies at the start of each program year.
- Agencies will provide quarterly reporting on CBO activities.

Terms and Conditions

- A customer may only self-certify once during a program year.
 - Requests to qualify with lower income will be referred to Agencies.
- WEAF will be discontinued but LIHEAP and Winter Help will continue to be available.
- Term of service will be 24 months and that term will restart with each application or assistance grant.
- Customers will not be required to report a change in income but may voluntarily do so.
- Medically fragile customers will not have special provisions.

Agreements with Agencies

- The Company will ask customers to voluntarily provide demographic data and will provide that data monthly to the agencies.
- Enrollment in the program implies customer consent to have their account and demographic information shared with the Agencies.

Personal Data	Values
Marital Status	Single, Married, Widowed, Divorced, Separated
Ethnicity	Hispanic or Latino, Non-Hispanic
Race	American Indian or Alaska Native, Asian, Black or African American, Native Hawaiian or Other Pacific Islander, White, Multi-Race, Other
Gender	Male, Female, Other
Number of People in Household	drop down numeric field - 1-10 and 10+
Education Level	Drop down value - 0-8 grade, 9-12 non-graduate, high school graduate/GED, 12+ some post-secondary, 2- or 4-year college degree
Household Income	Drop down values: 0 - 25,000, 25,001 - 50,000, 50,001 - 75,000, 75,001 - 100,000, 100,000 - 150,000, 150,001 - 200,000, 200,000 +
Average Annual Energy Costs	Formatted as \$0.00
Additional Income Sources	Drop down values: Earned, Social Security (SSA), Supplemental Security Income (SSI), Unemployment, Self-Employment, Child Support, GAU/ABD, L&I, Retirement pension, TANF, VA, Military, Work in lieu of rent, Other, No Income
Primary Heating Source	Nat Gas, Electric, Propane, Other
Have you applied for/received assistance I the last 12 to 24 months?	Yes, No
Veteran Status	Yes, No
Disability Status	Yes, No
Preferred Language (spoken and read)	



Agreements with Agencies

- Cascade will apply and expend the LIHEAP credit before applying the bill discount.
- Cascade will provide the Agencies with pre- and post-energy discount bill amounts in the Assist Portal.
- Agencies will use the Assist Portal for post-income verification.
- Extended terms will not be offered to fixed income customers.
- Cascade will proactively communicate with customers near the end of their term of service in the program to ensure they reapply in a timely manner.

Agreements with Agencies

- Annual reporting will include number of customers with a fixed income or disability status; percentage of those who reapply at the end of their 24-month term; and number of customers who contact the agency to inquire about other social services.
- Cascade and the Agencies will work on a joint-communications plan.
- Arrearage forgiveness will be offered upfront rather than monthly for up to a year and these customers will be offered extended time payment arrangements (up to 18 months).

Questions to ask in a Couple Years

- Should medically fragile customers be treated differently? Should they be removed from the income verification process?
- Should fixed income customers remain enrolled for a term longer than 24-months?
- Is the hardcopy application being used?
- Has the payment arrearage forgiveness upfront worked well, or should the program offer 1/12 the of the arrearage discount each month for a year?
- Should Cascade revise how it discusses payment plan options with customers?

Unresolved Items

- The program name
- The percentages of arrearage forgiveness offered per tier
- If LIHEAP is a prerequisite for arrearage forgiveness
- The Agencies' process for qualifying customers for LIHEAP and the bill discount/arrearage forgiveness programs at the same time

Unresolved Items

- Agency fees
- Program marketing, the details of the joint-communications plan
- Program cost recovery
- Key Performance Indicators (KPIs) and reporting details
- CBO reporting details

QUESTIONS?



May 26, 2023

Ms. Amanda Maxwell
Executive Director and Secretary
Washington Utilities & Transportation Commission
621 Woodland Square Loop SE
Lacey, WA 98503

Regarding: UG-210755 Compliance Filing to Commission Request for Updates to Advisory Group Pursuant to Order 09

Dear Ms. Maxwell:

In compliance with Paragraph No. 78 of Order 09 in Docket No. UG-210755, Cascade Natural Gas Corporation ("Cascade") encloses for filing the WEAFF advisory meeting minutes. The following documents are submitted electronically as part of this filing:

- UG-210755-WEAF-Agenda-05-26-2023.pdf

If you have any questions, please contact me at 509.734.4549.

Sincerely,

Christopher Mickelson

Christopher Mickelson
Manager, Regulatory Affairs
Cascade Natural Gas Corporation
8113 W. Grandridge Blvd.
Kennewick, WA 99336
Christopher.Mickelson@cngc.com

Attachment

WEAF Advisory Group

Agenda

May 24, 2023

KEY TOPICS: Maximizing LIHEAP Funds, AMP Design, Rate spread and spreadsheet toggles

GOALS FOR MEETING OUTCOME: Finalize decisions on approaches to maximizing LIHEAP Funds, AMP upfront relief vs. 12-month installments for relief, review rate spread and toggles email

Agreements

Account credits created by LIHEAP must be utilized before BDR discounts are applied.
AMP applications will go through the CAAs.

TPAs will be offered up to 24 months.

1. Exhaustion of LIHEAP funds before EDP applied – Dan
2. Requirement of LIHEAP application before AMP – Dan

Tillis, Daniel

We left off from the last full group full advisory group on the discussion about the decision we previously made to apply LIHEAP before bill discount rate. I have EDP on here which stands for Energy Discount Program which is what we call it in Oregon and still want to call it, and we can talk about that. If a LIHEAP pledge creates a credit on an account, then we don't allow the bill discount rate to apply until that credit is exhausted on normal monthly charges. Previously we decided to take the approach of exhausting all LIHEAP created credits before the BDR was applied, so we want to determine if we should hold on that decision and whether or not we should be required to see if a customer qualifies for LIHEAP before we see if they qualify for an AMP again to maximize the use of federal funds first. The third topic is the support that Public Counsel provided for the arrearage forgiveness approach of forgiveness upfront versus spread over 12 months with 1/12th being forgiven each month. We all agreed that we would try that approach for Cascade's program and then evaluate it later. When Public Counsel sent an e-mail with their support, they listed these conditions, so we wanted to talk about those even though I replied in e-mail but finalize that discussion and if we have time go back to the rate spread and toggle email Chris sent and then talk about topics for next week. Just a reminder that we're trying to file by July 1st, which in reality is probably July 3rd, so if we hold our full advisory group meeting in June, then that would mean we really only have five meetings including today with this small group to get all the decisions we need to make before that filing actually occurs. So, we definitely have some urgency here to make these decisions.

For the first agenda item, I want to open it up to the group to continue the discussion from last week and Misty was sharing some concerns about the approach of exhausting the LIHEAP credit first. Yochi or anyone else, do you want to jump in and open up the discussion and see how it goes?

Yochi Zakai

Sure, I can start. Misty and I had a chance to have some follow-up conversations offline last week, and I think I'll let her speak for herself in a little bit, but one of the things that really struck me coming out of that conversation is that it's going to be important for us to check in on this issue after a year or two, because I want to acknowledge the concerns that she had and we heard Cascade say that if we go forward with pausing the BDR while there's a LIHEAP credit that would be a manual process. And so, first of all, can I just confirm that is correct, Dan?

Tillis, Daniel

I believe it will be partially manual, partially automated. There will be some manual steps because there's just no way for our system to fully recognize, stop, and reapply BDR in those situations.

Sovak, Teri

Yeah, that is the one piece that the CC&B team has stated. They would work on automating that. If there's a payment that's posted, and it's noted to be from LIHEAP sitting as a credit on the account, they would actually stop the discount and then have to restart it once the credit has been exhausted, they are working to automate that piece.

Yochi Zakai

What does working mean? Does that mean it might get done in time for rollout or it might get done after rollout or it might never get done? What does that mean?

Sovak, Teri

I was still under the impression that would be something they would be able to automate.

Tillis, Daniel

It is a lot of work for them, and they feel like there's a lot of risk with the automation, I think, but it sounds like they're at least going to give it a shot.

Sovak, Teri

Yeah, we don't know what will fall out of the testing or what issues they'll run into, but as far as planning for that and having an idea what to do, they are working towards that date.

Misty Velasquez

If a person gets put on the BDR and then is taken off for LIHEAP are they going to be put in for verification and then they're taken off for LIHEAP, and then they get put back on? Where does the verification happen if they get chosen at that point?

Tillis, Daniel

I believe it should happen only once in the early stages of being put on the BDR, so what we've talked about so far is that when someone is approved for the BDR, then in the next bill cycle they are subject to random selection for income verification at that point. They would not be subject to

that if they have the BDR removed due to a LIHEAP credit and then added back once that LIHEAP credit exhausts.

Misty Velasquez

So if a person comes in or applies online for the BDR and is approved for it and by chance gets in the same month they have a LIHEAP appointment with us; they get put on LIHEAP and they're BDR is stopped. Is that going to take them out of the pool at that point for verification because they received LIHEAP and essentially, it's going to be considered done?

Tillis, Daniel

You could just use that data to say income verified.

Misty Velasquez

Right. OK.

Tillis, Daniel

Now that's a good question and I think that's one of those things we'll probably have some scenarios we'll have to work out after we get started. I don't know that we can think of every scenario.

Misty Velasquez

But other than that, I'm on board with Yochi and everything as well. As long as in the future we can revisit it if it's not working out with taking them off, putting them back on if it's not an automated thing. I'm just worried that clients are going to fall within the cracks and they're not going to get put back on.

Tillis, Daniel

It doesn't sound like we'll have that issue based on what Teri is saying, and I would imagine that there might be some fallout reports that we could end up working. Yochi – while you were signing back in, Misty just confirmed that she's good with the previously agreed on approach with exhausting LIHEAP credits before LIHEAP pledges that create a credit and LIHEAP pledges, in general, before applying the bill discount rate discounts. So, it sounds like everybody is in alignment now, but I will give one more opportunity - anybody object to that approach or want to comment additionally on it?

Yochi Zakai

That's the only other thing I'll say is I'm open to reevaluating after a year or two and seeing how things are going. I think that's true with everything, but I'll call it out for this in particular topic.

Tillis, Daniel

We can add that specifically to our list of future evaluation items and the discussion of requiring at least a review of customer's eligibility for LIHEAP before we attempt to qualify them for AMP. I use those words because if someone has a citizenship issue, they may not be able to apply for LIHEAP, but that makes them potentially unqualified, and so they would then go through the application process.

Misty Velasquez

I just wanted to mention here that I think we still should have them come through the agency

because even if they don't qualify for the federal LIHEAP. From my understanding, our state is going to have a state LIHEAP program for people and I'm not sure yet on the rules of that if people who are undocumented will qualify for that because it is a state program and not a federal program.

Tillis, Daniel

Does anyone else know about the state program?

Yochi Zakai

For the most part I think we should have folks go through the agency so they can evaluate them for the entire suite of federal funding and other sources of assistance that are available.

Tillis, Daniel

I think generally we're OK with that. I think the only concern we expressed in prior meetings was the potential bottleneck as far as the number of resources available at the agencies to qualify customers for an AMP compared to the number of resources available combined with the agencies and the company. I think Corey Dahl had mentioned that as a potential concern as well, so we can open that up for discussion. We're trying to avoid creating additional barriers and trying to remove barriers, and I believe someone expressed that as potential concerns with adding a barrier.

Corey Dahl)

I don't really have anything to add. I'm still curious if that is a valid concern or not? If it is a concern, would it be one to rise to the level of not proceeding this way. Some agency folks and maybe others that might have more direct experience with that might be able to provide some insight.

Tillis, Daniel

I've tried to continue thinking about this a little bit over the last couple of weeks because I think it came up for the first-time two weeks ago. We have the BDR, we have AMP, and then you have LIHEAP in there, and if customers are required to go through the agencies for AMP but not BDR then you'll have customers who don't have arrearage who qualify for BDR, and that's great; we can get them set up on that and we can refer them to the agencies for additional assistance, LIHEAP and other assistance. Customers with an arrearage, if we go through the BDR qualification process, our prior recommendation had been that we would use one calculator that would qualify the customer for both BDR and AMP and so in that situation I think we would be saying we qualify the customer for a BDR and then refer them to the agencies to see if they qualify for arrearage assistance and we can do that for sure. It'll be interesting if we go that direction to see what the fall out rate is between BDR and AMP. They may say I received BDR so I'm not going to bother trying to get help with my arrearage. It almost makes me wonder, should all qualification for BDR, AMP, and LIHEAP continue to go straight through to the agencies? I think the good of that is it's the one-stop shop. The agencies can qualify customers for everything and send the pledges over to the company via the portal. It actually helps with the LIHEAP EDP issue as well because we'll know up-front if that LIHEAP credit is going to create a credit on the account. The negative to me is a potential bottleneck of resources and it led me through that train of thought to wonder if we should try a different approach, where maybe out of the energy assistance funds, we directly fund staffing for the agencies, whatever amount they think they need to handle what will likely be an increased volume. Direct all customers over to the agencies for qualification and just fund that resource rather than pay on a per pledge basis. I know it's out of the blue a little bit but as I've been thinking about this,

it's just a thought that came to my mind. I say all of that without really knowing how much additional headcount you would need. Obviously it's going to vary by agency and in some cases that might be a full head count or more and for some it may only be a partial and we'd have to figure all that out. It may just be a terrible idea, and that's OK if that's your opinion. I'm not sure how I feel about it entirely either, so any thoughts?

Yochi Zakai

I can start out; I am open to the idea of moving away from a per pledge payment model and would be open to doing that. It's something that I would like to explore and I'm interested in hearing from the agencies what they would be able to do in terms of enrollment via self-attestation, a streamlined appointment, or a different process, because that would require agencies to change their processes so that they can get people enrolled without the full intake appointment that they have now, that includes income verification. As Marie's message says now, it's something that I think they might need some time to think about. What does that reorg look like to make that possible?

Tillis, Daniel

That's fair. It's a kind of a big idea that you weren't already thinking about already or not too much. What are the thoughts on whether a customer should go through agencies for all assistance or the split between the company and qualify for BDR, and then refer for AMP and LIHEAP to the agencies?

Yochi Zakai

I would really love to get some agency input, even if you need more time.

Marie Stangeland

I like the idea, but I'm just not sure how it would work. I feel like the agencies are the experts on doing all this kind of work but not sure how bombarded we would be. We're trying to get people signed up for the BDR right away.

Misty Velasquez

I like the idea as well. I've already been thinking about our process going forward with PSE and all that with clients calling us, we're going to be doing the self-attestation for PSE and doing that, I'm hoping at the time when the client calls us without an appointment and then schedules an appointment for LIHEAP the way that we normally schedule an appointment, I'm hoping to be fully staffed and possibly have a few more staff just as backup at the beginning of the season so I can have teams like one for Cascade Natural Gas and they can just be directed to that team of mine and then PSE can just be sent directly to the PSE team that's focusing directly on those self-attestation ones and then when clients get scheduled, an appointment for LIHEAP. They're going to see a completely different group of staff members of mine. That does require a little bit more funding to come in, so I can be fully staffed to have all of that by separating their job duties. Right now everybody does all of it, but I can't have my receptionist doing three different appointments while I have someone on the phone and doing different things. That's where I need to look at it a little bit more and be able to plan and see what I'm capable of doing come October. I do have a good amount of staff at the moment, and I am hiring for a couple of more positions so I could possibly do it that way where we could be taking the phone calls and they just get directed to people who can do it instantly.

Tillis, Daniel

I don't have any idea what you all pay your intake folks and what their titles are even, but I was just doing some math last week as I was thinking about this, and it would be a higher administrative cost that versus the per pledge fee that you earn today, so the agencies would receive more funding. And we want it to be enough staffing to not be a bottleneck so that would be an important goal in my opinion. We wouldn't want to understaff for sure. And I think if we overstaff a little then that could give those individuals some time to qualify for the other assistance those customers might need. I think there's a lot of advantages for the agencies. There's also advantages for the company if we're not doing any qualification outside of receiving website applications and maybe referring those over to the agencies. We could figure out the process for that, but if we're not doing any qualification at all, then we're not collecting the data we've talked about collecting, some of the timing of things for LIHEAP and AMP and EDP isn't fixed, but it's better.

Misty Velasquez

It also gives us the opportunity to screen at the same time for LIHEAP for any other programs that we may have in our pot of money that we currently have, and I think the clients are served a little bit better at that point.

Tillis, Daniel

While it may cost more out of the ratepayer funds to staff the agencies, it would likely result in maximizing the use of LIHEAP, so that would that would be offset by making sure we're using those LIHEAP funds first before AMP and before the EDP bill discount rate and not have that process where the company qualifies for part and then refers for the other part, and have that possible dropout in between with the customers who don't follow up because they don't have time or they don't perceive it as worth their effort.

Yochi Zakai

I shouldn't go too far into speculation, but I wouldn't be surprised if the agency staffing costs were lower than Cascade's staffing costs. I don't know if it would be a one-for-one comparison there. It probably wouldn't be, but it will be different costs.

Misty Velasquez

I don't know what Cascade Natural Gas pays their staff, but I can say my intake staff are paid from a range of \$18-21 but that's covered by multiple different programs that feed into that.

Tillis, Daniel

That's good to know. It's very comparable to what we pay our CSR's and our other frontline employees. And I'm assuming you give them benefits, which means you'd have a loaded labor rate in there, which is what we use as well since the company's paying for the majority of the benefits, so very comparable. And to your point, Yochi and it's a great point, whether we paid out the ratepayer Energy Assistance Fund or we have to staff more and pay labor costs that go into rates, it's a wash. In this case, we'd be paying people who have experience in this field, they do it every day, all day. The resource is probably going to be more efficient and more effective at the job.

Sylvia Schaeffer

I think we would be fine with doing the intake for the BDR. We don't start our appointments until January. We do crisis starting October 1st, but as far as qualifying people for the BDR, we can do that

as well as OLIBA and all those other programs that aren't tied to LIHEAP, starting October 1st. I think that would work out good for us.

Yochi Zakai

Interesting. So, I can understand better what you're saying is that you do OLIBA enrollment all year, but you don't do enrollment for LIHEAP between October and December, but only for crisis?

Sylvia Schaeffer

We do, if it's a crisis. We won't turn somebody away if they're in danger of getting shut off. But we do have a process where we register people first and then from that we do a random selection and then we schedule our appointments starting in January all the way through whenever we run out of people that have registered. But definitely we do LIHEAP starting when our contract starts in October. But based on the way our process is here at BMAC, we do not start seeing actual LIHEAP appointments until January, but crisis LIHEAP starting October 1st.

Yochi Zakai

OK, great. I know we've already said this, but I'm just going to repeat it again so that I'm 100% clear, because I'm learning about this process for the first time, but for OLIBA and for what you could do for Cascade you would be able to do that year-round, right?

Sylvia Schaeffer

Blue Mountain Action Council, correct.

Tillis, Daniel

And just to give you a little bit of additional data, I talked to Chris about this a little bit last week, too, and the current estimate is about 500 BDR qualified customers per month, which really comes out to about 25 a day and spread across agencies. I know it's not all equal, but you know, a couple per agency per day so that's the volume in the forecast. That doesn't mean that's going to be the actuals; we're hopeful that it's higher, but just to give you some data to think about it a little bit as far as staffing goes. I don't think we're talking about a few resources per agency or anything like that, and my estimate of one to two per agency would still be in line with what we might be paying in fees or even a little higher, but not drastically higher.

Yochi Zakai

I'm sure everybody or most people probably already know this, but of course the distribution of service within the past year or two has been very much focused on three large agencies: Opportunity Council and Skagit and OIC, I think, was the third., The other agencies are much smaller and have a much lower throughput of pledges.

Misty Velasquez

I can see us qualifying the customer for Cascade, if they have gas, we're going to qualify them for PSE all at the same time so that client could potentially be served with all of the programs with the BDRs at the same time instead of having to call Cascade Natural Gas, then call PSE and then call us. They're getting it all at one time instead of individual areas. If I were a client, I would much rather call one location and get everything than having to make three separate phone calls and sit on hold, potentially, at three different places.

Tillis, Daniel

That's a great point that I hadn't thought of for sure. We haven't talked about agency fees at all in this discussion yet; it's \$75 per WEAFF pledge today and \$25, I think, for Winter Help and if you do the math on that you're talking about a \$500,000 dollars per month if we keep them there, and if we gave each agency 1 FTE, and I'm just throwing it out there, talking about \$750K. So, it's, you know, it's 50% higher potentially, but all those other benefits are in there and Cascade doesn't have to add staffing necessarily to process those calls and applications so it's probably a wash with what we were anticipating and probably three to four headcount, which is going to be a few hundred thousand dollars so it's pretty close to a wash. This is a little off agenda and I guess feels like maybe first thing we should do is see if we can make a decision. It sounds like Yochi and Misty, and I don't want to put words in anybody's mouth, but it sounds like you're supportive of the direction to require customers to go through the agency for an AMP. Anybody object to customers being required to go through the agencies for an AMP application? OK, I'm not seeing any hands up or any comments in chat, so I'll take silence as agreement.

Tillis, Daniel

The first two items on the agenda we had decisions and on, the third topic is whether or not there should be direct funding to the agencies for staffing for all energy assistance from Cascade going through the agencies. I'm not saying we need to make a decision on the staffing levels today, but is there an opportunity to make a decision on that approach today?

Yochi Zakai

I guess my recommendation here was because we heard from a couple of folks that they'll need some time to think about it and make sure it works and I think that this would also be related to the change in funding, since it would be an increase in work. Could Cascade come back with a more thought-out proposal on funding and then we can consider that and then folks will have a chance to think about kind the overall approach? I'm leaning towards 'yes,' but I do want to give people time to think about it, it feels premature to ask for an answer today.

Tillis, Daniel

That's fair. I think Charlee and Jenn are not with us today, that will give them some opportunity to consider it as well. We'll make sure we encourage them to either watch the recording or read the minutes to get the insight on the discussion. We'll list it as one of the first items on the next agenda and pick it up from there. Chris and I can discuss putting together a recommendation based on the forecast and if somebody at the agencies could share with us what you use for a loaded labor rate with all of the benefits and everything because we want to make sure we fund it at that level and not just the hourly rate level, so your true cost, that would be helpful for our calculations. We use about \$65,000 per CSR as an example, even though they're hourly and would only put them at about \$40K. So, if somebody could share via e-mail or something that would help us. Otherwise, based on your hours, we'll make an assumption that is similar to our CSR.

3. AMP – Discuss PC's conditions for Upfront relief for all tiers vs. 12-month relief period for tiers 3

- a. Discussion and adjustment of the percentage of arrears relieved upfront for customers with incomes >50% FPL. We would like to make sure that the percentage amounts are meaningful enough to ensure that customers will indeed be able to pay the monthly additions resulting from payment arrangements of their remaining arrears.
- b. Future assessment of program outcomes after implementation and discussion with the advisory group to make any needed adjustments to the program.
- c. Availability of payment plans >12 months to align with what customers know they will be able to pay. Additional discussion of payment plan terms (i.e., if customers miss a payment, are unable to pay in full, etc.)
- d. Evaluation and revision, as appropriate, of how the Company communicates with customers about payment plan options (i.e., customers are presented with options, rather than being enrolled in a “default” payment plan through IVR or other means).

I'm going to move on to item 3 unless anybody has anything else on that topic. As I opened with, we have the agreement on the upfront, arrearage forgiveness approach for our program and then Public Counsel's agreement on that was with conditions. If you all will indulge me, I'm going to go through 3B through D first and then come back to 3A because that's a big topic that may take us the rest of the meeting. I totally agree that this is on the list of future assessment of program outcomes as far as how the upfront forgiveness for tiers 3 through 5 is working. In fact, it might be on the top of the list, and then as far as availability of payment plans, payment arrangements, we're in on greater than 12 months. We typically use up to 18 months and I think we'd be willing to go up to 24 months. In general, if a customer tells us they need extended months, then we work with them on that, so we have no objection to that. I think with this group we just need to see where we are comfortable with the update 18 months or up to 24 months, does anybody have a preference of using up to 18 months or up to 24 months for TPA time payment arrangement?

Misty Velasquez

I know that clients right now are given 18 months through some utilities. They're being given up to 18 months to pay on payment arrangements, so I think that's beneficial to the client and they would possibly be able to make their payment and keep current on their regular bill. I would vote for 18 months.

Yochi Zakai

And what's your thinking and not going up to 24, Misty?

Misty Velasquez

I think people move out of their homes very quickly. They'll possibly end up going to collections. I don't know what your policies are at Cascade. If a customer goes on a payment arrangement and they're living in a home, and then they happen to close but they moved to a new residence, they get a new bill account number because they have a new residence. Does that old stuff follow them, or would that go away?

Tillis, Daniel

I'm going to defer immediately to Teri.

Sovak, Teri

It doesn't automatically transfer to the new account. There would have to be conversation with a CSR to ask to do that. If they're stopping and starting service online, it wouldn't automatically happen.

Tillis, Daniel

We do have prior obligations in Washington which means a customer can move and not pay their past due balance and really not suffer any consequences because we're currently not charging deposits; that moratorium still exists. The only possible hit would be if it's a credit report hit, and frankly, we don't report to credit reporting agencies, so there's not even that. If they voluntarily move and aren't turned off for nonpayment, then the prior obligation doesn't apply so they would fall in the scenario of us trying to figure out what to do with that. The longer the payment arrangement, the less likely it is that the customers honor it so I think that could be one argument against going beyond 18 months to continue extending that out, and I think it's kind of what Misty was saying. Life changes a lot in 18 months, good or bad. During the COVID moratorium in Washington, the requirement was up to 24 months for TPA.

Sovak, Teri

We're still at 18 months for Washington, but I'd have to go back and check.

Tillis, Daniel

OK, maybe in Oregon that was 24 months.

Sovak, Teri

Oregon was 24 months.

Tillis, Daniel

If Oregon was 24 , Washington was 18, so we used 18 during COVID and we really still use 18 honestly. Again, if customers say I need 18 months, we'll set it up and hopefully they honor it. This is one of the items that was on Public Counsel's list, so do you have any preference for 18 or 24 months?

Corey Dahl

I prefer 24 just to maybe gather some data on where customers land and customer success, at least in the first year or two, and then we can maybe tailor it from there.

Yochi Zakai

But I'd like to prompt the other agencies to see if they have thoughts on the timeline for the payment plan. We welcome hearing more input from the agencies on this.

Sylvia Schaeffer

Can they have a choice? To me, it doesn't really make a difference. I think it's all depending on what the client or the customer is able to pay.

Tillis, Daniel

Yeah, absolutely. It's really tailored for the customer and the conversation. There are a couple of ways it could work: you all could qualify a customer for LIHEAP and/or an AMP or BDR and then if they have an arrearage that's not fully covered by the AMP, then refer that customer to the

company to discuss an arrangement for the remaining balance that they'll have; then our team members would just open it up with how much can you pay each month and how many months would you like to extend the payment arrangement? So, it's really tailored for the customer and our employees are trained to have that conversation on TPA.

Yochi Zakai

If the agencies are going to be doing all the AMP, can the agencies tell Cascade how long the customers want to set it up for? It could be something additional for the agencies, but I think from the customer perspective, it would be a lot easier if the person that gave them the arrears grant also enrolled them in the payment plan at the same time.

Misty Velasquez

So the time payment arrangements will be for anything that's owed after the AMP?

Tillis, Daniel

After LIHEAP and AMP, correct.

Misty Velasquez

Has anybody done any data on how many people actually have bills that are really past due that would need to go on that after they've gotten LIHEAP and AMP? I guess my question is, is it really going to be a lot of people?

Yochi Zakai

I think so, Misty, because maybe not in the lower income brackets where people qualify for LIHEAP, but where folks don't qualify for LIHEAP and when we're talking about above 150% FPL, we're only going to be giving them a certain percentage, so there's going to be a leftover amount.

Misty Velasquez

Right, I understand that. I am also thinking about the state LIHEAP program that I was talking about, that is going to be for people 151% up to 80% AMI. I know that's a very new program and it's going to start on October 1st, and nobody really has all of the ins and outs of that program yet, but for the people who don't qualify for the regular LIHEAP, I don't know that it's going to be a lot of extra people needing the time payment arrangements. Maybe it is, but I could see our agency possibly being able to handle that if it's built into what we're qualifying a person for. It doesn't sound like it's a lot. It sounds like you're asking the client how much they can pay and for how long they need payment arrangements.

Tillis, Daniel

I think we really like the idea, but I would envision it as you're extending that conversation to, you're going to have some balance leftover; how many months would you like to spread it out? OK, that's X dollars a month; are you comfortable with that and then submit that in the portal with the other pledges and the BDR discount percentage. As long as we staff the agencies correctly, hopefully you can handle whatever volume that might be and that would prevent a call to Cascade which would prevent us from maybe needing that staffing. So probably a wash there as well.

Misty Velasquez

As long as we can plan our staffing correctly and we are working all of that into budgeting, I don't see us not being able to type something into the portal. We're already having that conversation with

the client, so we've already figured out what the client qualifies for, so I don't see that being an issue for Skagit.

Tillis, Daniel

Thoughts from other agencies on having that time payment arrangement discussion as far as how many months?

Sylvia Schaeffer

I agree with Misty. I don't think it would be an issue for BMAC either. Besides the new state program that's coming on October 1st, we also have CDBG funds through our City of Walla Walla and so when people still have a balance, we usually tend to use that also to pay off people's bills that were not covered by either LIHEAP or WEAFF, so it's possible that we will also use that if a person still has an outstanding balance.

Tillis, Daniel

Maria put in the chat that she thinks it's probably fine but needs some time to think on that as well, which is fair. I don't think giving Cascade the number of months for the TPA is necessarily something we have to decide today so I think we're comfortable with 24 months if that's where this group wants to go. I think Sylvia brings up a great point: it doesn't have to be 24 months; it's really up to the customer and the company to a certain extent, but really mostly up to the customer as far as how long that is. For the sake of time, any objection to just starting with up to 24 months for the TPA and evaluating as needed?

Corey Dahl

One more thing that I'll just say is these payment arrangements going up to 24 months is made with the knowledge that not everyone is going to opt for 24 months and I think a lot of the success of the program will come in how the options are presented to customers who qualify for the payment arrangements and are looking to enter them after arrearage relief. If customers are given the information they need to make those decisions, such as if you go for 18 months, this is how much your monthly bill will increase; if you go with 24 months, etc. I think there could also be other information provided like most customers with an arrearage near what you're paying off are successful with 18-month arrangement or whatever that may be, so I think that it just comes in how information is delivered and empowering customers to make the decisions that are best for them and their families.

Tillis, Daniel

Someone had brought up in one of our meetings that the agency staff is trained to have budget discussions with customers, and I think the TPA discussion is really about what are you comfortable with in your budget to pay for your gas bill in this case each month to catch up to on that leftover past due balance so it feels like a natural part of the conversation.

Corey Dahl

Absolutely.

Tillis, Daniel

On to Item D - within the IVR on our website, customers can make pay plans, set pay plans, short-term pay plans typically, and there are some exclusions on when those can be set via the IVR or

website, so we can definitely add in some verbiage in both our IVR and on our website to make sure customers who are setting up short-term pay plans are aware of the longer term arrangements that are available. I won't go into all the detail on this IVR flow but basically when a customer selects the option to say I want to set up a pay plan, we would insert another option in there that says you may also qualify for energy assistance or long-term payment arrangement options, press 1 to speak to an agent about those options or press 2 to continue to create a Pay Plan . So I wanted to just share that we're able to do that with you all and also get your feedback on the verbiage. We can also put similar verbiage on our website in that process when the customer is going through that online pay plan establishment where we say you can continue setting this pay plan or you may also qualify for energy assistance, and then we could do one of two things; we could refer them to our customer service number or to an agency, or we could also just refer them to an online application where they could just apply at that point as well and figure out referral process. Any immediate feedback on the verbiage we have here initially? We want to get this finalized because it does take some time to get IVR and website changes made. So, we'd like to get those started. We don't really even need to wait until we have the new programs in place to get these changes made. We'd like to get them made as soon as possible, but no later than October 1st for sure.

Yochi Zakai

Is energy assistance too much of a wonky term? We might want to say something simpler like "based on your income, you may qualify for help with your bill" or is 'assistance' a well-known word. I'm just trying to think if folks who work with agencies have thoughts on what you're outreach material normally uses and what's well understood.

Tillis, Daniel

I worry a little bit about using the word income a lot just because it almost sounds like we know their income and we definitely don't. We could say something like there are income-qualified customers who may be eligible for bill pay assistance.

Yochi Zakai

So in the chat, Misty suggested bill assistance and all the other agencies immediately thumbed it up.

Tillis, Daniel

OK, so maybe you may qualify for bill payment assistance or long-term payment arrangements?

Yochi Zakai

Yep.

Tillis, Daniel

OK, easy enough.

Yochi Zakai

My other thought is providing this to people once they say they want a payment plan, but I'm wondering do we want to make the option one level up that everybody who gets their bill balance may qualify for bill payment assistance or a payment plan? That would kind of put it even more prominently.

Tillis, Daniel

Yeah, there are a lot of customers who call in to get their balance who aren't in need of assistance

and so it feels out of place there to me because the other options are, I just want to go pay my bill, that's all I wanted, and hang up. I feel like where we're suggesting it is the right place. Anyone else have an opinion on that? No, ok. As far as the website part, I've asked for a screenshot of where it might be placed on our website and as far as through the pay plan process and what that would look like. I'll share that with the group as well when I have it. It really doesn't matter because the customer could set up a long-term payment arrangement without even getting any assistance if they really wanted to.

OK, last topic that we're going to get to today is the percent discounts or percent arrears forgiveness for tiers 3 through 5. Chris, I'm going to turn it over to you for this discussion. I'm assuming you'll want to share the spreadsheet and we could open it up for discussion on what we think each tier should be.

4. Rate Spread – *Chris Mickelson*

- a. Review the written description provided by request

Mickelson, Christopher

This is the area where we're focused. We've thrown out our proposals., Are there any other thoughts?

Yochi Zakai

My only other point of reference at this time is Avista, who I believe did 100% for the first two and then 90% for the bottom 3. I admit that I have not gotten the most recent version of this spreadsheet and haven't thought through exactly what a proposal would be, but I'm willing to start some numbers at 90, or 80/60.

Mickelson, Christopher

Well, with the 90% like Avista, you're looking at a program at full enrollment of over 62 million a year, so that seems pretty substantial, which would be around a 60% increase in our rates. I don't know if the Commission would go for this but it's something I guess you're talking about with Avista and maybe others.

Tillis, Daniel

Chris, what would 09/80/60 look like?

Mickelson, Christopher

About 52 million.

Tillis, Daniel

Compared to 80/60/40.

Mickelson, Christopher

We were at 42.

Tillis, Daniel

So about a 10 million difference.

Corey Dahl

One thing I'd like to point out or suggest we think about is that if the programs we are proposing here work as intended, to make customers' bills more affordable, this isn't the type of program that customers would enroll in year after year for the arrearage forgiveness. So, I think that kind of changes the longer-term cost of the program, considering we don't anticipate full enrollment to happen in one year or probably even several years after the implementation of this program. My educated guess is that this would not be an annual budget of over \$60 million, and in fact, I think that those dollars would be spread out over the course of many years.

Mickelson, Christopher

And that's why I've always been showing the enrollment level at 10%. I figure that is about what we would expect to see for the first year so then these numbers would be very comparable to what you're seeing.

Yochi Zakai

As we discussed via e-mail, I just want to confirm, the assumption here is based on arrearage data from most of 2020 and 2021, right?

Mickelson, Christopher

Correct.

Yochi Zakai

So that's assuming that arrearage is from 2020 and 2021 are similar to what we'll see in the future.

Mickelson, Christopher

Also correct. This kind of goes back to our accounting petition having that both revenues and expenses all go into the bucket and you're ultimately trueing up over/under. It would be no different than a PGA or conservation or any other type of pass-through type mechanism. So even if we over project say one year then rates would stay flat or maybe even decrease the following year for other customers that fund this.

Tillis, Daniel

What would 85/70/50 look like?

Mickelson, Christopher

Around 44.8 million at a 10% enrollment. So, it would be 40 million. But like Cory said, not sure if the same levels would be at 100%.

Yochi Zakai

I'm really hoping that LIHEAP is going to cover a lot of this.

Mickelson, Christopher

Well, if it covers AMP then you probably don't see it cover as much energy discount; it's hard to say. Another aspect we could do is, I think I heard the group indicate that PSE, you can only get AMP during the two-year cycle so you can only, I guess, tap this program one time within a two-year period. Well that would also help half this number.

Yochi Zakai

I guess my assumption would be if customers are enrolled in the bill discount rate, then we set their energy burden at a reasonable level, then hopefully they will be able to pay and stay current. And I was just looking at a report from LADWP. they recently ended all disconnections because they have a discount program that does self-attestation and sets energy burden reasonably, and they have found that once they get people enrolled on the discount program, the vast majority are able to stay current on their accounts. I think they have almost 70% of their customers enrolled in the bill discount were able to stay current.

Tillis, Daniel

Right now I think we've made the assumption that a customer could qualify for an AMP once per year or similar to qualifying for LIHEAP once per year or WEAF once per year. Are we thinking once every two years, or along with the EDP cycle, or do we want customers to be eligible once per year if they need it; what are the thoughts there?

Yochi Zakai

Would that make Cascade more comfortable with having a higher arrearage forgiveness amount if we had customers only qualifying once every two years for the AMP?

Mickelson, Christopher

What do you mean by a higher arrear forgiveness amount?

Tillis, Daniel

The percentage of discount for Tier 3 through 5, Chris.

Mickelson, Christopher

That would allow, but I guess that also then goes to other utilities, mostly Avista and PSE had caps on how much was eligible and they're also dual utilities. If we take the same aspect like energy burden, where gas is about 1/3 of that burden, then if I take 25 therms by 1/3 think, that puts me somewhere in the \$900 - \$1100 pricing cap, which would be over a year and a half for Cascade on an annual basis.

Yochi Zakai

We're talking about a lot of different things at the same time, but I'm willing to go there. I would be open to a cap as long as there were a process for exceptions. But I think generally it is reasonable to say that there should be some sort of cap as long as we have a way to process hardship and extraordinary circumstances. And I've got to be honest, sorry, I'll just say a little more and then that's similar to my thinking with the payment plans: it's like most people aren't going to want more than 12 months. I think it's going to be more of an exception to the rule when we would go beyond that.

Mickelson, Christopher

By the way, this is what their TPA would be.

Tillis, Daniel

If we limit AMP qualification to once every two years and have a reasonable cap with a potential exception process, the higher percentages are acceptable from just from a program cost standpoint.

Corey Dahl

Hopefully even after a year or a little more than a year we revisit these tiers and determine if they are adequate or if people are falling behind again. An important thing to remember here is that this isn't set in stone. This is a novel program that we'll have to revisit and fine tune as we go.

Mickelson, Christopher

I know we have our list of things we plan to come back and revisit, but I would say there's quite a few of these things probably within the two- or three-year-timeframe we would probably come back and revisit once we actually have a couple of years of data. I would say three because at that point we kind of know trends.

Tillis, Daniel

Chris, what's the total program cost with no cap set right now with customers being eligible every two years for an AMP at these percent arrearage forgiveness levels?

Mickelson, Christopher

The 1.8 for the AMP per year.

Yochi Zakai

If that's acceptable to the company--my preference would be to limit the number of times a customer can enroll to the number of times they're enrolling in the BDR and they could kind of make sense to have those synced up. If I had to choose between the two, I'd take that over a dollar cap. Especially because we know some people are still recovering from large arrearages from the downturn of the last couple of years.

5. Topics for 5/31 Meeting – All

Tillis, Daniel

OK. Are we at a point where we want to approve these Tier 3 through 5 discount levels with qualification eligible every two years and in alignment with the bill discount rate program with the CAP amount and the exception process TBD?

Yochi Zakai

Do we want to revisit this at the start of the next one?

Tillis, Daniel

Yeah, we can do that. Chris, maybe if you can send out an updated spreadsheet after you make any other tweaks you want to make, and then give people a little bit of time to review it. This and the funding model could be our top two topics for next week and then potentially the item topic we didn't get to today with the rate spread e-mail from Chris.

Mickelson, Christopher

I will send an updated model after I get with Dan to talk about kind of the agency funding piece so people can see all that. I'll try to provide by the end of close on Friday.

Tillis, Daniel

OK then that sets our agenda for next week. Thanks everyone have a great Memorial Day weekend.



June 02, 2023

Ms. Amanda Maxwell
Executive Director and Secretary
Washington Utilities & Transportation Commission
621 Woodland Square Loop SE
Lacey, WA 98503

Regarding: UG-210755 Compliance Filing to Commission Request for Updates to Advisory Group Pursuant to Order 09

Dear Ms. Maxwell:

In compliance with Paragraph No. 78 of Order 09 in Docket No. UG-210755, Cascade Natural Gas Corporation ("Cascade") encloses for filing the WEAFF advisory meeting minutes. The following documents are submitted electronically as part of this filing:

- UG-210755-WEAF-Agenda-06-02-2023.pdf

If you have any questions, please contact me at 509.734.4549.

Sincerely,

Christopher Mickelson

Christopher Mickelson
Manager, Regulatory Affairs
Cascade Natural Gas Corporation
8113 W. Grandridge Blvd.
Kennewick, WA 99336
Christopher.Mickelson@cngc.com

Attachment

WEAF Advisory Group

Agenda

May 31, 2023

KEY TOPICS: Maximizing LIHEAP Funds, AMP Design, Rate spread and spreadsheet toggles

GOALS FOR MEETING OUTCOME: Finalize decisions on approaches to maximizing LIHEAP Funds, AMP upfront relief vs. 12-month installments for relief, review rate spread and toggles email

Agreements from 5/31/23 meeting:

- Agreed on the Arrearage Forgiveness Percentages listed below.

Arrearage Management			
<i>Tier</i>	<i>FPL %</i>	<i>AMI %</i>	<i>Discount</i>
T1	20%	4%	100.0%
T2	50%	12%	100.0%
T3	100%	24%	90.0%
T4	150%	36%	70.0%
T5	200%	80%	50.0%

- Agreed on the rate spread listed in the WA LI Program Funding v3 spreadsheet.

1. Agencies handling all Energy Assistance Applications – Yochi/Misty
 - a. Agency Staffing/Funding Model review - Chris

Tillis, Daniel

I'd say the last several weeks we've had great discussions and last week we got close to a couple of really key important decisions, and we are getting close to the last handful of big decisions we need to make before we might be ready to file. We only have about four meetings left before that date is here and so the agenda that I shared on Friday. Yochi and Misty, hopefully you're OK that I put you as part of that first topic. I thought you could help lead the discussion with where TEP and the agencies might be now on all of the energy assistance program applications and BDR, along with LIHEAP already going through the agencies and the company not being an intake for those at all other than referring them to the agencies. We might get some online applications that we would refer to the agencies. Chris on here for 1A which maybe we start with by sharing some staffing funding models you put together for the agencies. Chris and I had a chance to chat about those on Friday and then shared those in the updated spreadsheet and cost allocation model among other things.

Yochi Zakai

I can mention via way of transition, I think we said last week that we would be open to having the

agencies be the primary point of contact. They do like a website application on Cascade's website that folks could fill out that would feed into the agencies. It all depends on making sure that this discussion includes funding and making sure that the agencies feel like they're going to be compensated for the additional work it would entail to be taking all the phone calls about applications considering the higher expected enrollment amounts. So, we're looking forward to that discussion and I appreciate you providing the spreadsheet in advance. I was able to take a look at it, but I haven't had a chance to discuss it with any of the agencies yet and so we might not be able to give you a response on that today. And I wanted to start off by saying we appreciate that we are going to learn more about this proposal and then figure out what additional questions we have and take it back for consideration after this meeting. I just wanted to set that expectation that I don't think I'm going to be able to give an answer on if the funding is going to work or not at the end of the call today.

Mickelson, Christopher

So basically there's this new toggle you can select fee or staffing. There are two types of staffing. I'll get into that in a little bit. Personally, I like the staffing fee and I'll explain why. This information was provided by Misty, thank you by the way. We found out what the average FTE rate is, the benefit rate; we're using the standard 2080 for hours, which gives us the average FTE cost.. Then based off that we figured out how many FTEs would be needed based off the enrollment level and how many anticipated customers would be signed up. In this instance it's at 10% enrollment. We're looking at 5.7 FTEs. If we go to say 30 then the FTE changes. And then obviously the average cost times need indicates what your staffing cost would be, so that's just a straight staffing cost amount. The staffing with P (stands for performance) is taking a piece of the history of WEAFF and what each agency typically signed-up, so as you signed-up more, we figured it made sense to reward those agencies with more funds than those who may not have signed-up customers. And there's a few counties and agencies that historically have maybe only signed up two or three WEAFF recipients throughout the year; that's a very low percentage of the possible low-income customers in those counties. So, they would still get more money than the agency fee compared to historically, but obviously, if they signed up more, they would get more funds in the future; if they signed up less, then obviously, they'd get less funds, but that's kind of what this column ended up doing. Overall, it kind of provides a little more additional funding to recognize that performance piece and then essentially it takes that amount, figures out for each of the agencies, and then how much they would get. Now some agencies, they would be able to hire 1 ½ agents and others a little less. Some agencies historically signed up, say 5 WEAFF recipients on average each year, and so if I took $5 * 75$ that would be \$375. We're still recommending giving them \$1000, so it's still almost three times what they would normally have gotten from the fee base. We're trying to incent them to try to focus a little more on getting people signed-up, but if they still perform lower than expected, then obviously they don't quite get nearly the funds some of these other agencies get. Any questions? I know that was kind of high level and may have been quick.

Charlee Thompson

What is the performance column in column N?

Mickelson, Christopher

That is figuring out a weighted average out of the possible Cascade customers, how many are eligible for this program and then the performance piece is how often did that agency sign up WEAFF

recipients within that county. By the way, on calculating what FTE is needed, it's taking the eligible AMI count within that county, times whatever our enrollment level is, taking 365 days in a year, minus out all the weekends and then determining what an FTE, how many daily applicants they could do. Talking with Misty, she indicated on average they do about five and she expects if someone was solely doing this, they'd be able to do more than five. In doing so, I actually decided to go with a lower number; I did four and part of the reason for going with that was to hopefully help reduce any backlogs because I know the agencies right now get people signed up, but they can't really see them until maybe two or three months down the road, so by doing a lower number you can work through some of that backlog.

Misty Velasquez Community Action of Skagit

When I said five, that's five appointments that we're seeing today where we actually schedule the client. They have to come in to provide all their documentation to us and in the future, when we're not going to be doing appointments, it's all going to be self-attestation over the phone with the clients. I figure my staff will be able to see a lot more people, but it's just going to determine how we set up our program. It's going to be a phone call and then doing a very small amount on the website when we get them approved.

Mickelson, Christopher

You'll still be doing appointments to get LIHEAP and AMP, is that not correct?

Misty Velasquez Community Action of Skagit

Isn't AMP also going to be self-attestation?

Tillis, Daniel

Yes, but the customer will be required to go to the agency first or to attempt to qualify for LIHEAP first, which is not self-attestation, and then the only customers who wouldn't have to go through that would be the customers who don't have the citizenship status required to qualify for LIHEAP. So, if you do AMP first, you could do that via self-attestation.

Misty Velasquez Community Action of Skagit

My understanding was we were going to do self-attestation to get these people on as quickly as possible, and we then schedule LIHEAP appointments as we were able to fit those appointments in. Am I thinking about this wrong?

Yochi Zakai

I think we're still thinking about it. If we can enroll people in BDR right away and then for those people who we think are going to qualify for LIHEAP, get them an appointment so they immediately start getting a discounted bill, but then once they come in for the LIHEAP appointment, we're going to be able to forgive arrearages and then use the AMP to cover whatever is left if LIHEAP does not fully forgive their past due balances at that time.

Tillis, Daniel

I think that process would work. The BDR could be submitted through the portal. We could apply it and then leave everything else as is at that time until we receive additional pledges on the portal from the agencies.

Misty Velasquez Community Action of Skagit

I would say we will probably be able to serve a lot more people than just the five a day because we're going to be signing them up for the BDR with self-attestation and just scheduling an appointment for a later date.

Jen Rightsell

Right now if this person has a LIHEAP appointment or an energy appointment, it can be noted onto the account, but it doesn't prevent them from being disconnected if they're up for disconnect. What if a customer comes in for BDR and we approve them for BDR and we schedule them for an upcoming LIHEAP appointment, but they have an arrearage on their account, is the goal to do LIHEAP before the AMP? Would it make sense for Cascade Natural Gas to be able to hold an account to prevent disconnection until the LIHEAP can be reviewed? The LIHEAP appointment can be reviewed, and the AMP applied.

Tillis, Daniel

If a customer tells us they have an appointment with an Energy Assistance Agency, we do not progress to the point of disconnected service for non-pay.

Misty Velasquez Community Action of Skagit

You might want to check with Shannon because we mark it in the portal that they have an appointment, but we have been told that is not stopping disconnections.

Tillis, Daniel

I can tell you that our process for our credit and collections team is that if we're on the phone with the customer and they tell us they have an appointment with an agency or even that they're trying to get an appointment with an agency, that credit rep, who has to manually create that disconnect order, should not create that disconnect order. They should defer that account for further review in the future. Shannon, I don't know if the portal currently writes anything that the agencies are telling us about the appointment date to the account in CC&B.

Steed, Shannon

It does automatically once they submit it. There's a drop-down list of three different types of notes that they would like to add to an account and once they make their selection and hit submit, it just takes a moment for that to turn into a note on the customer's account.

Tillis, Daniel

Our credit and collections process is that no disconnect for non-pay order goes out without a manual review by a credit and collections rep. That's the final step before the order would actually be sent to our field technicians to disconnect the customer's service. Part of the process for that credit and collections rep is to do a thorough review of the account before they even try to call the customer. If they see a note that states that the customer has an appointment, they might still try to call them to see if there's anything else that can be done, but they should not send out that disconnect order. That's our process even if the note is not on the account and a customer verbally tells us I have an appointment with BMAC on June 1st; the credit and collections rep should not send out that disconnect order. The account should be protected with the note you provide in the portal with whatever process we decide when you qualify customer for any type of assistance.

Corey Dahl (PCU-he/him)

So my one thought has turned into two questions. Based on this conversation, I guess this is directed at Jen, are you hearing that customers are still receiving disconnection notices, despite the fact they've scheduled appointments. Is that what's happening?

Tillis, Daniel

Well, that's different. Our credit and collections process does not stop as far as automated calls and disconnect notices and such while the customer is getting an appointment or has an appointment. However, we will not disconnect service That manual process at the end where the credit and collections rep is involved, that's where they say they have an appointment, we're not sending out that disconnect order.

Corey Dahl (PCU-he/him)

OK, that's helpful to understand.

Jen Rightsell

We've had a couple of our staff earlier this morning in fact that said that their client they were seeing today had their gas turned off and then called to get it turned back on a couple of times since they made the appointment for energy assistance. It says that they had called the call center to provide the appointment date and then turn it on only to have it turned off again later and then told that they have to have a pledge amount to get it restarted.

Tillis, Daniel

If that happened, then it's a breakdown of the process and somebody is not following the process. If you have those accounts you could share with us, we can definitely review them to see what happened. I can tell you; we had a complaint recently from WA Commission where a customer service rep didn't do their job right and that did result in the customer being disconnected when they should not have been, and we made an exception to our reconnect process. We did make it right, even though it obviously was a bad experience for the customer and getting their service turned off. It was a human error and it's unfortunate, but it does happen.

Jen Rightsell

If someone gets disconnected, is payment or pledge required to get it reconnected or just working through the prior obligation process, and then if a deposit is needed that gets billed later?

Tillis, Daniel

If the customer is disconnected for non-pay, they can choose not to pay the outstanding balance and start a new account, using prior obligation rules, and currently in Washington, deposits are still on moratorium and so they wouldn't even be required to pay a deposit and they could set up new service. If the deposit moratorium were to go away, then they would be required to pay a deposit on the new account.

Jen Rightsell

So it's the moratorium that's preventing needing the deposit to reconnect now - OK.

Tillis, Daniel

Correct. The Commission is currently reviewing disconnect, reconnect, and fee rules. There's actually a workshop scheduled for second half of June on that topic, but until that review is

completed, all of those deposits, reconnect fees, late fees, all of that is on moratorium. I think we got into this discussion because of what the order would be in the qualification process for BDR and AMP.

Corey Dahl (PCU-he/him)

That's a good segway into the first question that arose since we got the second one taken care of. So, this is responding to something that Yochi had mentioned about the process that BDR would initially be applied to an account and then customers would be referred for LIHEAP and then AMP would be applied for eligible customers. How does this work for customers that are ineligible for LIHEAP, due to an attested income above LIHEAP eligibility and or a circumstance where they do not meet the immigration status requirements.

Tillis, Daniel

If they had self-attested income above LIHEAP eligibility that means that they could still qualify between 151 and 200% for AMP and BDR, so there are a few options. They could immediately self-attest for BDR and AMP through the agencies, if that's what we choose to do and then they might be in the pool for later income verification processes, which we might have to work back through a little bit depending on what decision we make here on where customers are going to go for qualification for the different programs, but they could still be eligible for BDR. If their self-attested income ends up between 150 and 200, they would be eligible and then that would be submitted to the company via the portal and then the portal would be our source for the random pool selection for self-income verification. If they aren't eligible because of citizenship status it would be somewhat similar, but they could still be eligible at any point within the income spectrum at the different tiers, they just wouldn't be eligible for LIHEAP so they wouldn't have a later LIHEAP appointment, since that's out of the question at that point. But, based on their self-attested income and household size, if they're between 0 and 200, then they would be placed in that tier for both BDR and if they have a past due balance, they will receive the arrearage forgiveness for that tier. And again, I think they would then end up in that pool for random selection for post qualification, income verification. If we decide to continue with that, that would be the only pool because if somebody comes back in for a LIHEAP appointment, they would be income verified then.

Corey Dahl (PCU-he/him)

Right. That all makes sense in terms of benefits that those individuals will be qualified for. I'm just thinking about the process flow and maybe I'm misunderstanding what was being discussed and proposed earlier, but it sounded like those who attest to an eligible LIHEAP income and would also be eligible for AMP, would be referred for a LIHEAP appointment automatically.

Tillis, Daniel

What we're trying to work through is that, and I think we were close to an agreement last week is that we would like for all AMP and BDR qualifications go through the agencies if WEAFF is going away and if we could get staffing levels right, agree on the funding for staffing levels. I think the question is, if a customer called an agency can they qualify customer via self-attestation for BDR over the phone and then schedule a LIHEAP appointment for later to then try to qualify them for LIHEAP, and if they qualify for LIHEAP but it doesn't cover all the arrearages or if they don't qualify for LIHEAP then add AMP on if they qualify.

Corey Dahl (PCU-he/him)

I think that makes sense. It's pretty hard for me to visualize it without some sort of actual process flow in front of me.

Tillis, Daniel

I was actually thinking earlier, Corey, that it might make sense at some point—we're going to want to come back to see if anybody has any questions on the staffing models—but it sounds like we're probably not going to make a final decision on this today, but in the interim, it might make sense for the agencies and TEP to take a shot at the flow of what you would like to see happen for BDR, AMP and LIHEAP altogether going through the agencies.

Yochi Zakai

What you described Dan makes sense: a customer would call and based on self-attestation on the phone, get enrolled in BDR and then you'd ask some basic questions about eligibility for LIHEAP and get them an appointment for LIHEAP, if that doesn't cover all of their arrearage then give them AMP for further arrearage forgiveness at that time, if Cascade is able to follow its processes and not disconnect folks in that time period. If customers are not eligible either due to income or other type of status then I think on that phone call they could be eligible to get AMP right away getting the arrearage forgiveness and the payment plan. Based on them not being eligible, there's going to be a state funded energy assistance similar to LIHEAP that is going to be available for customers up to 80% AMI. And so, I do think if we're going to have state funding available that we're going to want to make sure we're qualifying customers for that too. So it could be that with the state funded grant, we're going to want most folks to come in for an appointment first. I'm not sure exactly what the eligibility criteria will be for those. I'll acknowledge what you said in the chat Corey about customers being forced to disclose their immigration status. And I guess I defer to the agencies to see how they deal with that today.

Misty Velasquez Community Action of Skagit

As we're taking down their information for our application, we ask if they have Social Security number. If they state no, we move on from that and we wait until the end, after we get everybody in the household, to determine because as long as there is someone in the household with Social Security numbers, they still may qualify for LIHEAP. It's the way that the program works, the majority of the people we see, even undocumented people, still qualify for LIHEAP because of their other household members that live in the home, so I don't foresee a problem with that. When you were talking about scheduling LIHEAP, we would only schedule a LIHEAP appointment if they qualified for it, and if they didn't qualify for one reason or another, we would then do the self-attest at that time with the client to get them qualified for the AMP.

Corey Dahl (PCU-he/him)

OK, those are very helpful pieces of information, which helps me better understand the process.

Tillis, Daniel

I just want to restate to make sure we're all on the same page on what we're hearing. The desired flow from the agencies is that the customer who calls the agency and indicates that the need for assistance; you would like to have the ability to allow them the opportunity to self-attest income and household size immediately to qualify for BDR. The agency would submit that pledge through the portal and indicate that they have an appointment for LIHEAP so they will be protected from

disconnect for non-pay, and then, once you have the LIHEAP appointment, you'll try to process the LIHEAP application 1st and then use AMP as needed based on that LIHEAP application qualification. If in that initial conversation you discover they won't qualify for LIHEAP for some reason, immediately you could qualify them via self-attestation over the phone for both BDR and AMP, and then you submit that in the assist portal, and that would really be the end of the process. Other than later, that would be our pool for potential post qualification, income verification and random selection. Is that an accurate summary of the flow that you all think would be best? Misty said in chat that's how she's envisioning it. Chris, based on that, does that change how you would that change the model option in any way.

Corey Dahl (PCU-he/him)

Based on what I'm hearing and understanding, that makes sense. Is it possible for Cascade to develop a visual of that process so we can all see it and make edits to what the company's understanding of the flow would be at this point?

Tillis, Daniel

I can try to put that into a flow.

Mickelson, Christopher

And Dan, as for your question, when you said model, are you talking about an AMP calculator like we have in Oregon or are you talking this particular model reflected on the screen?

Tillis, Daniel

Yeah, I was actually talking about the agency staffing funding models that you put together that are on the screen.

Mickelson, Christopher

At the moment I don't think it really changes the proposal and the staffing piece. The one caveat I haven't mentioned that I will here is, these agency fund dollar amounts you get at the beginning of the program year, that's how we envisioned it versus the fee as you sign people up. So, it's more of an ongoing basis and so that could also help staffing and planning for the agencies. That is something to consider when thinking about these two different agency-type funding methods.

Misty Velasquez Community Action of Skagit

So what year did we take these number of clients that we've seen for our WEA numbers, what year is that from?

Mickelson, Christopher

Last year.

Misty Velasquez Community Action of Skagit

OK. By this gadget basically it's less than a full-time person based on last year's numbers, but this year's numbers are way up.

Mickelson, Christopher

Yes, the numbers are way up. Since it's really based off the eligible customers that are 80% AMI out of the county, that the number of Cascade customers served within those counties and that's really what we're trying to target, all of these eligible customers within the county on these programs.

Tillis, Daniel

Chris, as I look at this again, one of the thoughts that I have is I think your model has 500 BDR applicants are qualified customers per month, right? And then when I look at those counts for historical years, that comes out to about somewhere just shy of 200 per month, so it makes me wonder if that's understating what we'd likely see with additional outreach on BDR and AMP together, that might go to the agencies starting October 1 of this year once we have the new program in place and it's via self-attestation. Let's say we'll have a ton more hours because we already do a lot of outreach for WEA, but we'll certainly try more. I don't know if there's a way to build a model that's more about what we expect the BDR total to be, which is the higher number. Working CBO will hopefully drive some of that up, which is new.

Yochi Zakai

Can I ask a question? The total staffing costs are based essentially on the enrollment level toggle, is that correct? And then it's only the apportioning of those costs between the agency that changes when you switch that toggle.

Mickelson, Christopher

Correct.

Yochi Zakai

So if we wanted higher compensation amounts, we would use in this model to support those assumptions and that would be the enrollment level and then the number of daily applicants that the agencies were able to process, if I understand that correctly.

Mickelson, Christopher

Correct. Keep in mind though, enrollment level does impact the AMP and energy discount because that is also determining how many we think we'd actually get and realistically, I would say 10% for this first year would be a very good goal because, like Dan said, historically we've been getting maybe 2 1/2, maybe 3% per week. So, getting two to three times what we get would be a substantial increase, then next year, 25-30% maybe should be our goal.

Yochi Zakai

Thank you. I really appreciate having all the notes explaining all the toggles. That's really helpful.

Misty Velasquez Community Action of Skagit

So the daily applicants is not considered, I'm concerned about that because our daily applicants, when its self-attestation, is going to be pretty much almost every phone call that we take. We take in anywhere from 150 to 200 phone calls a day.

Mickelson, Christopher

Well, we're only expecting 4.

Misty Velasquez Community Action of Skagit

I am concerned about that. Our phones ring nonstop, every three to four minutes we're on a different call.

Tillis, Daniel

Are all of those Cascade customers?

Misty Velasquez Community Action of Skagit

Not all of them, but we are screening them for all programs. So, when they call in, we're asking them what their heating bill is and some use Cascade for cooking. So, we are screening every single person that comes through our door and responding. I think Jen said she has 900 calls in an hour. Our phone lines have crashed. There are some days that we're pulling in 400 to 500 hundred calls. I've got 10 staff members answering calls and seeing clients at the same time.

Yochi Zakai

This is a model that underpins some assumptions that guide what funding for the agencies should be. I am not envisioning that Cascade is creating a model that will reflect the actual operations of any agency, either in aggregate or on any specific day. I'm open to push back here but the way I was thinking about it was that I would recommend we take back now for TEP and the agencies to look at the overall funding amounts and say, based on a rough estimate of the amount of work that we anticipate this new program would bring in, do we think that this is an appropriate compensation amount regardless of whether the actual calculation is exactly how the staffing will end up being used? Is that a fair task for the next week and does that kind of line up with what everybody else is thinking?

Tillis, Daniel

I was assuming that question might have been more for the agencies or others, but I'll just go back to BDR, and Chris, this is partially for you as well, but we assume BDR is going to be about 500 qualified customers per month, probably a really high qualification rate if it's via self-attestation. We don't see a lot of customers giving us income levels that aren't qualified via self-attestation. It happens but it's a very high qualification rate when they apply. Are we really factoring in that 500 a year when we're based on historical WEAf data because we have a new program that we're expecting more customers to qualify for? I think we have some room and Chris would know better than I, but maybe some room in the model to adjust that a little bit for the funding to account for that. If the agencies want to take a shot at what you think, if you tell me it's 500 and we could give you a spread of what that would look like by customer population and tell us what you think that incremental BDR load would increase your staffing need, I think that's one way to take a shot at it as well.

Mickelson, Christopher

And by the way, the 500 is on a monthly basis that works out to be about 2 customers per day per agency. Going with four daily applicants, part of our goal was to help reduce the backlog. You're talking about 500 customers overall, not 500 customers per month per agency. The overall possibility for this program is around 60,000 of our customers and as you can see this by county. In essence, look at your county and see what the eligible low-income customers that are up to 80% AMI and get a sense of how many in your county that you could possibly see.

Tillis, Daniel

You could see the WEAf numbers on here for a year, so agencies on average the last few years are approving 2,208 Cascade customers for WEAf, so you're looking at going to 6,000 who would qualify for BDR, and then within that maybe the AMP and LIHEAP; it's basically 2 ½ times what you're doing today for WEAf already.

Jen Rightsell

Agencies might focus on LIHEAP first and then bring on these other programs during the appointment as they find that customers are eligible for them. With having customers come in this way, it's like coming in for the utility programs and then determining if LIHEAP is eligible for them so it's kind of a backwards way that we are used to doing things. It'll take some time trying to figure this out.

Misty Velasquez Community Action of Skagit

And not only that, when we do our advertising, because of the way Jen just described it, we focus on LIHEAP first, we're focusing on the lowest poor in our communities. Our focus has never been really on the 151% or up to 80% AMI. People this year are just finding out because PSE moved up to 80% AMI that we are able to serve at this higher rate and people are coming in. By this time, we dramatically slow down for appointments, and I can tell you I'm booked out until the end of July right now for people who are coming in that will qualify for WEAFF up until the end of July right now, which is not heard of.

Mickelson, Christopher

OK. Thank you. This really should probably be looked at in congruence with LIHEAP utility programs and it sounds like maybe even state funds in the future. So, you may have three different buckets being looked at at the same time, and I think a well-designed calculator or verification model would be able to do all three at the same time just by putting in the income, the household size, and answering the questions that we've all discussed.

Tillis, Daniel

I keep going back to 500 BDR per month and you going through that just now; maybe we're talking about intake calls that the agencies are taking instead of setting up an appointment for later or to qualify them for LIHEAP where they'll be going through the BDR qualification self-attestation process on that upfront phone call. It's going to be more real time, which means more customers are likely to go through it and then later they're going to have that LIHEAP and AMP appointment. Hopefully some of that's funded by the LIHEAP Fund, so it shouldn't all be carried by Cascade, obviously. I just think there's something from a volume standpoint we're missing here.

Mickelson, Christopher

Well, if so, then that's the enrollment level. It sounds like maybe we'll be able to do more than two or three times what we've historically done and maybe it's closer to 20% of the enrollment level.

Tillis, Daniel

I guess we're at a point where we need to probably move to Yochi's suggestion of maybe having TEP and the agencies talk over the next week and build some models of what they believe staffing levels would need to be for the primary intake for a BDR and later AMP with LIHEAP and some AMP up front. Based on their experience and knowledge of their daily call volume and historical WEAFF data, I do think we should consider some sort of gross up for WEAFF volume just because we know that it's been higher this program year in volume and increases in cost and pledge amounts based on that. We could extrapolate what we think 22-23 program year is going to end through May data with just a few months left in the year, and I think ideally the way we want to staff this is to avoid booking appointments over a month out. We would like to get those appointments taken care of earlier rather than later to get customers the relief and not to continue to move the customer through the

collections process for their arrearage balance. Not every customer that qualifies for BDR is going to qualify for AMP because they may not have a past due balance.

Mickelson, Christopher

And to take advantage of federal funds getting those funds sooner, too. Yes Misty, the 7760 is the entire counties eligible low-income population. I can't imagine you would get 100%. That would be great if you got it in one year. Then I guess year two, you would have nothing but LIHEAP.

Misty Velasquez Community Action of Skagit

I'm not saying that we're going to have it. I'm just saying that's the potential and its completely self-attestation. You will be surprised how many people come out to try to get on this program and people that we're going to be turning people away because they're not going to qualify. You have to figure that in too; how much time are we going to be turning people away who are going to call and want to get on this program because they think they can.

Tillis, Daniel

Yeah, I mean that that's where the enrollment rate comes into to play so you have to assume some sort of enrollment rate and then that gives you your monthly volume, and the daily volume, of course. So, we will go with the approach of TEP and the agencies talk about this and come back next week with some recommendations or thoughts. And then internally we can see if there are ways to think more about that BDR volume compared to the historical WEA volume and what other options we might think are viable. Jenna asked what is the current enrollment rate for 2023 so far?

Steed, Shannon

I can check on that.

2. Arrearage Forgiveness Program Design – Tier 3 – 5 Percentages, Forgiveness Cap and Frequency
– Chris

Tillis, Daniel

OK, so we'll let Shannon do that and then maybe once she has it maybe she can provide that to Chris separately in the chat and then we'll come back with some enrollment rate data for us. Let's move to the next topic in the meantime and we'll be working with the spreadsheet for that as well and that was the Tier 3 through 5 arrearage forgiveness percentages. And this was another topic where everyone wanted to take a week to think about it and see if we're comfortable with the percentages that are there for Tier 3 through 5, which are 90% for Tier 3, 70% for Tier 4 and 50% for Tier 5, so I'll open it up for input and thoughts on that. Alright, everybody's quiet. So that means you're good with the percentages, right?

Yochi Zakai

I'd love to hear from the agencies specifically looking into three through five. I'm comfortable with 90 percent, you know for Tier 3. Tier 4 looks like our average arrearages are going to be \$811.00 and then Tier 5 it's \$850 and so for folks up to 150% FPL for giving 70% of that upfront and then for folks in that highest income bracket between 150 and 80% AMI, we'd be giving 50% of it with the remainder going on a payment plan.

Tillis, Daniel

We have a couple agencies in the chat who have said they're good with the it Yochi - OppCo and BMAC.

Jen Rightsell

It's just a curiosity question for the discount rate. We're not good with round numbers for the discount rate, so I see 71% or 8%. Why not go with round numbers for those why 71 versus 70 or something like that?

Mickelson, Christopher

That was decided a while back, but it was to get a particular energy burden percentage.

Tillis, Daniel

It keeps them all on that 35 to roughly 3 1/2% range. Misty said that Skagit is good as well and Charlee has said that in NWECC is good. Thank you both. Is anybody not OK with those arrears management arrearage forgiveness percentages?

Yochi Zakai

I think I can be good with it, and I think this is something that we're going to want to look at in a year as well. But I think for the first year I can be good with it.

Tillis, Daniel

Great. Thank you.

Corey Dahl (PCU-he/him)

As a quick refresher, I know these are updated numbers, but I can't remember off the top of my head what the originally proposed discount percentages were for tiers 3 through 5.

Mickelson, Christopher

I think it was 80/60/40.

Corey Dahl (PCU-he/him)

That's what I was thinking, but I wasn't totally sure. Public Counsel would not oppose these percentages.

Tillis, Daniel

Great. That looks like we have a decision on that, which is excellent. Chris, do you have what you need to answer the question from earlier about the current year WEAF info?

Mickelson, Christopher

We've done about 1% so far of our customers so that's a little less than 2000.

Tillis, Daniel

Which is what we've done historically for full year, right?

Mickelson, Christopher

Exactly. We're still close to our historical average. It looks like it's maybe more front loaded than spread out evenly throughout the year.

Tillis, Daniel

I would expect the volume is not going to be up the same percentage because the dollar amounts are higher because rates are higher, and we increased the max grant to \$625 and established a minimum. We also went back and gave some customers who had already qualified some increased amount of pledge amounts as well, so the volume is not going to be up. It looks like a little bit, but the total dollar amount pledges are up significantly.

Mickelson, Christopher

Alright, do we have time to go to the next item on the agenda? It sounds like everybody's good with the AMP percentages.

3. Rate Spread – *Chris Mickelson*

- a. Review the written description provided by request

Tillis, Daniel

The next item is going to be about the spreadsheet and the functionality of it, the toggles and the rate spread, so we're where we need to be. By the way, if I were to take the average per month for the WEAf pledges, if it stays flat, it won't, but there would be 2,866 pledges for the year--obviously the summer is going to be a little bit lower--but it's still definitely going to be higher than what we've seen historically as far as the volume goes; we've done about 1,658 so far this year so we're only 600 short of our best for the year.

Tillis, Daniel

The next topic was a carryover from the last few week and Chris had sent out a written description of the various toggles and the data that's in the spreadsheet and the rate spread that you see in cells G35 through roughly L35, which is the rate spread. Chris had answered some questions about it so wanted to see if anybody still needs any explanation or anything that's in the spreadsheet or has any questions on it. OK I don't see any hands up.

4. Program Name – Dan

Our second to last topic is program name. We want to market the combination of the bill discount rate and the arrearage forgiveness program. We need an official external name for the programs like we have for WEAf today - Washington Energy Assistance Fund. We do need to have this before we file. In the state of Oregon, externally and internally, we call the bill discount rate the energy discount program or the EDP. At one point we were going to name both programs in both States AMPED for Arrearage Management Program Energy Discount. We didn't get to an AMP in Oregon for a lot of different reasons, so we left just the AMP part out. Internally we call it EDP as well. We'd certainly love to continue to call the Washington bill discount rate the EDP for simplicity's sake, so I'm just trying to think of a good name or acronym for these programs. I just want to get this group really thinking about some ideas for names, we're certainly open to ideas.

Corey Dahl (PCU-he/him)

How about Cascade Arrearage Relief Energy Discount - that says CAREED.

Tillis, Daniel

I like that a lot. that was fast, Corey.

Corey Dahl (PCU-he/him)

In my brain, I tend to think of arrearage or debt relief rather than forgiveness. You know, it's not a sin to have debt.

Yochi Zakai

I like it too, and much better work than I could ever do, Corey - good job.

Tillis, Daniel

We have a leader in the clubhouse if anybody else comes up with any other great ideas, let us know, and you don't have to wait until next week. Feel free to send them via e-mail if you want. You can even post them in this chat anytime you want to. The last topic, that we're going to talk about next week and I think that's going to be pretty easy to start with is revisiting the staffing models for the agencies handling BDR and AMP qualification being the primary intake for that. In addition to that topic, I'll leave the program name on for us to come back to any ideas you might have in between this week and next week, we made a decision on Tier 3 through 5 for forgiveness, so that's good. We don't need to continue to keep that one on there. And no one had any additional questions on the spreadsheet, so we don't need to keep that specific topic as far as asking questions about the spreadsheet. Any other topics for next week?

5. Topics for 6/7 Meeting – All

Yochi Zakai

Can the company think about a timeline for providing a draft tariff and filing to the group for review?

Tillis, Daniel

Chris, do you want to think about that and reply via e-mail before next week or do you want me to put that on the agenda for next week?

Mickelson, Christopher

Put it on the agenda for next week, but I would say once we get the name and I don't think we need much more from that, we could get something sent around the week of June 19th. Obviously, you guys would only probably have that week to look at it and provide input the following week, so we'd be filing--if we're trying to still keep with the July 1st, which I think is a Saturday, so we either need to do it that Friday or push it out to the 3rd which right before a holiday.

Yochi Zakai

The other thing that I've been thinking about with the tariff is if we want the actual discount percentages to go in the tariff or if we just want to put that in the cover letter where we're explaining more of the program design and then maybe put in the tariff that the discount will be set to bring energy burden down to under 3.6%. That way we might have a little bit more flexibility in working with the advisory group to do adjustments in future years without needing to make a tariff change. I think that future year adjustments would still involve full discussions with the advisory group as well as a filing with the Commission, but that filing could be something a little bit more informal perhaps included in an annual report or a separate filing, and maybe not have the exact

discount percentage in the tariff. Or if we do have the discount percentage in the tariff to also include that goal because I guess the point that I'm trying to make is I want the Commission and the and folks reading the tariff to understand that the goal of the discount is to bring energy burden down to a certain percentage and not to provide a discount of a fixed amount.

Mickelson, Christopher

We were planning to explain as part of I believe it was Senate Bill 59, that the goal is to bring energy burden below 6% and that's what the Senate bill stated. I believe we were planning to put the percentages in and I think our draft already reflects the percentages in there so any modifications through this advisory group in the future in a year or two when we review these programs, would most likely have to do a tariff change anyway to accommodate a lot of those modifications we decide to go with.

Charlee Thompson

I was just going to jump in and say that I actually think that's a really good idea Yochi. I like the idea of not necessarily etching the percentages into stone, but as you said, highlighting the goal of reducing the energy burden. But if we're going to have to change the tariff anyway, which I didn't necessarily think about, then I guess that makes sense and look forward to reviewing the draft filing soon.

Mickelson, Christopher

If commission staff is on board with not having percentages in there then we could look at some way to design the tariff that way, but I would definitely want to get their input and buy in on that.

Tillis, Daniel

Cory said in chat that he thinks memorializing it in the filings cover letter is fine.

Gross, Jennifer

I think it's a good idea to have it in the tariff because it gives clarity to the customer and also clarity that we're not discriminating between customers. There's a clear rule of what we will apply.

Yochi Zakai

We can talk about this more next week. I'll think about it a little more, again the goal which I think could probably be accomplished in multiple ways is to clearly identify that we are setting it based on percentage of energy burden and ultimately the group's goal is that the actual percentage amounts will be adjusted to maintain that goal of reducing energy burden it consistent with state law.

Tillis, Daniel

Corey - your question in the chat about the name, I do think CARED, the past tense doesn't market as well as CARES does, but I can't think of a good S. You could go with Cascade Arrearage Relief Energy Savings, and we could still call it EDP internally. It is energy savings if it's a discount, but that's an option and CARES markets better than CARED.

Corey Dahl (PCU-he/him)

I think so too. It probably doesn't send the right message, but we used to care, not so much anymore. We still have some time to think about it, but I think we're on the right track.

Tillis, Daniel

Yeah, I agree and I'm sure you all will stay awake tonight trying to think of a good name and probably will help you fall asleep a little faster than normal. Next week's agenda we will start with agency staffing models being primary intake, maybe some follow up conversation on the draft tariff filing and the timeline on that program name. Anything else we want on next week's agenda? Anything else big we need to make a decision on before filing? I won't send the agenda probably until Friday afternoon so if anybody in the group thinks of anything that we don't have on the agenda yet, let me know. Any final comments, questions, or topics before we wrap up this week? Thanks everyone. Have a great rest of your Wednesday.



July 14, 2023

Director Amanda Maxwell
Executive Director and Secretary
Washington Utilities & Transportation Commission
621 Woodland Square Loop SE
Lacey, WA 98503

Regarding: UG-210755 Compliance Filing to Commission Request for Updates to Advisory Group Pursuant to Order 09

Dear Director Maxwell:

In compliance with Paragraph No. 78 of Order 09 in Docket No. UG-210755, Cascade Natural Gas Corporation ("Cascade") encloses for filing the WEAFF advisory meeting minutes. The following documents are submitted electronically as part of this filing:

- UG-210755-WEAF-Agenda-07-14-2023.pdf

If you have any questions, please contact me at 509.734.4549.

Sincerely,

Christopher Mickelson

Christopher Mickelson
Manager, Regulatory Affairs
Cascade Natural Gas Corporation
8113 W. Grandridge Blvd.
Kennewick, WA 99336
Christopher.Mickelson@cngc.com

Attachment

WEAF Advisory Group

Agenda

July 12, 2023

KEY TOPICS: Joint communications plan and Reporting/KPIs

GOALS FOR MEETING OUTCOME: Create outline for joint communications plan, discuss current list for reports and KPIs for possible additions/edits

1. Initial discuss on joint communications plan – Dan

Tillis, Daniel

Before we jump into the actual agenda, which only has a couple topics, Jen and Shannon had a conversation on a topic related to customers who are disconnected and reconnect with a new account number and how the bill discount rate process will work. Teri will actually provide an update on that.

Sovak, Teri

So my understanding of the question was for customers that voluntarily disconnect service and are active with a bill discount; how will that be handled if when they start service again. They will have a new account number and our plan is to have reporting process in place where we can monitor stops in service with accounts that have active bill discount so we can review to see if there is a new service where the discount can be transferred to, so it will be a manual process and we still have that report to develop.

Jen Rightsell

Would that also work with people who have been disconnected for non-payment?

Sovak, Teri

We are planning to review accounts that have active bill discounts prior to disconnecting for nonpayment. I'm not sure of what the exact scenario would be where that customer would end up being disconnected for non-payment, but if there is debt on the account and it's considered prior obligation, then we absolutely do need to start them on a new account ID. But it would be the same process where we would review to see if that bill discount could be transferred. I don't think that we will run into that frequently, especially if the customer has a significant discount, where they would be disconnected for non-pay.

Jen Rightsell

OK, as long as there's a process, because there could be customers who may not qualify for the deepest discounts but qualify for smaller discounts and not be able to pay their bill and they happen to get disconnected because they're not aware they can call and get the arrearage management or anything else. So, that would be good to have some sort of process that you guys keep a look out for.

Sovak, Teri

There's always potential. We would be looking at it again in those instances where they have the discount, so as long as they're in contact with us, they can enter into a payment arrangement on any additional funds that they had difficulty with, then we should be in a good place.

Charlee Thompson

The initial question that was asked, which was for the customers that voluntarily disconnect service and have an active BDR or BDR on their account, how will that be handled if they go to a new account or set up a new account? So just repeating it back, Teri from my understanding, the plan is to monitor accounts that have active BDR and then Cascade will manually apply the discount rate on to the new account when the customer starts that new account. Is that right? Do customers have to be the ones to reach out and say I had this discount on my old account could you apply it to my new one or is that part of the manual process that Cascade is going through.

Sovak, Teri

That is what we would be monitoring for; wherever we see a stop in service on a service agreement that has the discount, they do not need to let us know that the discount needs to be transferred. They certainly can mention it, but our plan is for our reporting to capture that scenario for review.

Tillis, Daniel

Any other questions on that topic? OK, Jen, thanks for the question. And Teri, thanks for the explanation. I think it's a good question and we'll share the process. The other update I was going to provide, and it's somewhat related, is that we've been working on planning and implementation as an internal team at Cascade all along, but as we have submitted our filing, we've started putting a more formal process in place to plan for implementation, so a project plan. We'll make sure to fully define that process as a task on that project plan as far as monitoring any accounts that stop and have the BDR and what the solution is for the discount to continue to be there for the customer if it's appropriate. We are in full implementation mode even though we don't have approval yet and we feel like with this group having consensus and agreement on what was filed that we should have a pretty good shot at that happening.

Jen Rightsell

Another thing that comes up often is that we see is people who get disconnected for non-payment and have to go into prior obligation. Since we have an arrearage management type of program available for people who have active accounts, would there be some sort of arrearage management that could be possible for closed accounts for those that got disconnected for non-payment in terms of if they make good on a couple of payments that they've set up? Would they be eligible for forgiveness for the rest of the balance amount, because that would help a lot of low-income individuals?

Tillis, Daniel

Great question. We historically haven't been allowed to utilize refunds. Jen is your question where the customer has utilized prior obligation and opened a new account, we want to use any arrearage relief funds to help with that old account? Or is it, they just moved out of the area, for example, or no longer need Cascade service, but they have a balance still and would we use arrears relief funds to help with that? I need to understand the scenario a little bit more.

Jen Rightsell

I would probably advocate for people who have nonpayment issues like they got prior obligation through nonpayment first, before looking at other bills, that would be what I would prefer.

Tillis, Daniel

I guess I would open it up for anybody else who has any thoughts on that.

Jen Rightsell

And I can answer for LIHEAP for what Yochi had asked a question about how does LIHEAP handle this; with LIHEAP you we can only apply grants to current accounts; we cannot apply grants to closed accounts.

Tillis, Daniel

And that's currently the case with WEAFF as well, right?

Jen Rightsell

Yes.

Tillis, Daniel

Any other thoughts? The goal of the programs is to avoid that disconnect, both the ongoing bill discount as well as the arrearage relief portion of it. It doesn't hurt the company to apply arrearage relief to closed accounts. I think there are some ratepayers who have an opinion on whether or not someone's disconnected account should receive ratepayer funds to offset that. Corey, Shannon, Jennifer, Chris, feel free to jump in but my understanding is that the company has asked in the past if we were permitted to apply funds to prior obligation accounts, and we were told no that it could only be applied to active accounts to help customers with active service and prior obligation and help that customer who might have gotten disconnected set up new service with fewer obstacles. Andrew, what is your take on it since you're with Commission staff?

Roberts, Andrew (UTC)

I'm not sure of communications specifically sent to Cascade, but I do have a letter in front of me dated from May 11, 2011, from a Commission staff to all the energy utilities that says in bold, the purpose of energy assistance is to prevent services from being disconnected, not to repay bad debt. So, based on that, that's been my understanding; energy assistance funds are to pay off that or keep the service connected. I do see benefit in helping the customer with the prior obligation amount so I think it's something that could be discussed, but the way it currently is, I don't think those ones can go to prior obligation.

Tillis, Daniel

That's really helpful, Andrew.

Corey Dahl (PCU-he/him)

Just something to think about, and this is just for the purposes of discussion on this, without weighing in on the overall value of approaching relief for prior obligations, is that for uncollectible amounts that is already covered by ratepayers, that goes into rates anyway so that's just something to think about. Either way, ratepayers are subsidizing debt that can't be collected from customers.

Tillis, Daniel

Yep, totally. That's a more difficult thing for your average customer to understand, though, and you know, just in our response to our customer notices on the CARES program filing, we're hearing from customers who are unhappy that we filed for this program and that they'll have to help pay for it. We can explain to them that one way or the other, they're going to pay for it. It's not an easy conversation for our team members to have with customers to really explain it in detail on how it works and the regulatory mechanisms, so I totally agree. I'm not opposed to exploring whether or not we want to use the arrearage relief portion of CARES to help in that situation and I don't know how we would go about that; Andrew I don't know what your thoughts are on the right way to see if there's any appetite for a shift in that 2011 position. You know, a dozen years later, but I think as a company we'd be willing to have the conversation.

Corey Dahl (PCU-he/him)

I also think it's worth discussing.

Roberts, Andrew (UTC)

I agree, I think it's worth discussing. I'm just not sure what the first step of that discussion would be. I could reach out to staff over here and get back to you.

Tillis, Daniel

That sounds like a good first step. I mean, if you get a response that's never going to change, we can just move on or if you get some response that we need to take some steps to try to explore it more, then we can see what those are.

Roberts, Andrew (UTC)

Yeah, I will tie that up. Thanks.

Tillis, Daniel

Ok thank you, Andrew. Anything else unrelated to the agenda before we get into the agenda items? The first agenda item was the initial discussion on the Joint Communications Plan. I did want to share the logo that we put together for the CARES program with this group, that will be on our messaging outreach to customers, on the application, online and paper and the various places. I would take your feedback if you have any. It's similar to our energy discount program logo in Oregon. We tried to keep those fairly consistent. Any thoughts?

Charlee Thompson

It looks great.

Tillis, Daniel

All right, I will stop sharing that and then I will share the document that Charlee sent, I appreciate you sending that. I'll be completely honest and say that I haven't really had a chance to look at it much, so I'm hoping Charlee or someone else will walk us through it and we can all look at it together.

Charlee Thompson

The document is based off of a similar one put together by Avista's advisory group when we started having conversations about what a joint communications plan for the company and the agencies could look like. This version has been updated to apply more specifically to Cascade and things that

we've talked about in our advisory group. There are three main components of it. I tried to separate them by having the underlying larger text section, but the three components are responding to inquiries of fraud, so in this case it's just these two questions – how do we know that customers aren't paying for free riders and how do we ensure the integrity of the CARES program? I tried to list what's the purpose of this section, who's the intended audience, who can use this plan and the purpose. Intended audience would be for Cascade staff and for the agency staff, so we're using the same language, getting at the same viewpoints etc. I don't know if I could walk through the others really quickly, but maybe we could. I'll pause here just so people can read it because my guess is not everyone has had the chance to look at it in depth. The other thing I was going to say while you're reading that is, the intention of this drafted plan isn't to be the final plan, and two, it's not supposed to be prescriptive for the company and for the agencies. You'll see it doesn't tell you, and it's not supposed to tell you how many times to send an email versus a letter, or when you should send an email versus a letter or by what date you need to have a certain communication completed by. It's not a full set of like responses to common questions. These are just ideas that I listed. We can make it more concise or whatnot, so I think the intention of having this was a more to start the conversation and to have something to work from, because that's always easier than not.

Tillis, Daniel

I notice it says for Cascade and Agency reference only; this would be just responding to media inquiries or customer inquiries, right?

Charlee Thompson

Right.

Tillis, Daniel

So not FAQ that would be on our website or something like that. Good.

Charlee Thompson

We could add FAQs on this, thought it was important to differentiate this because this is probably going to be a key communication that we want to be ready to answer.

Tillis, Daniel

The other question I would have on this, since it is more reactive to inquiries, is there anything we want to do on this topic in an initial communication? If we decided, and I don't know if we will or not, but if we decided a press release once it's approved and ready to implement, we want to proactively address the fraud concern or just be more reactive in that. I'm just asking that question more for thoughts. I don't know which way my opinion would be.

Charlee Thompson

My opinion would be to be proactive and not reactive. It's good to have the reactive plan as well and you'll see the next section – what general advertising communications should go out. Marketing the program as it's about to go out next year when we're still talking about it because people will just then be hearing of it, etc., and one of the points in it was about the 5% of monthly applicants who will be randomly selected for verifying their income and what was the purpose of that. Being transparent about what that process is because customers will have to undergo the verification process if they choose to enroll in the program. Also, what main things do we want to have in pamphlets or on a website when asked what is the program like?

Tillis, Daniel

I think it's really good. The only thing I feel like is missing there is, there's nothing about the arrearage relief portion of CARES in that section. Is that handled in a different section?

Charlee Thompson

I'm going to note that.

Yochi Zakai

Can I go back where you had 5%? It doesn't say what happens to the 5% and so I think we should include randomly chosen for income verification.

Charlee Thompson

Yeah, that sounds good. What are some common FAQ's that the company and the CAA should be able to respond to in the same way, with the same talking points? Again, for those two organizations or entities staff, we can start reading what the questions are, what the responses are, Cascade privacy policy; maybe a link or a resource for CAA staff and CNG staff, in case they need to dive deeper or want to refer a customer to an additional resource. The second bullet point enrolled in CARES means the customer can no longer get assistance from LIHEAP - that question I was like trying to workshop a lot yesterday because I don't know if this is exactly what we would be asked or if it would be a broader question. When we're talking about Community Action agencies, I'm sure Cascade staff already has this on hand, but customers might wonder who is my Community Action agency and having a resource would be helpful as well.

Tillis, Daniel

We will typically include a list of all 12 agencies on any communication we send if it's more of a general program type communication that's going to be printed all the same and go to every customer. If it's something were targeting by the customer's address or something, then we would list the specific agency in that customer's area. We will definitely do that and or link them to our website if it's an email or something like that where they can see the list of agencies as well.

Yochi Zakai

The sign ups going to happen through the agency with Cascade, so that's a difference from Avista. That probably needs to be reflected here because this says that Cascade's going to do everything, but I think that most of this is probably going to be the agency, although I'm not sure exactly who's going to do what, and I don't know how much we've talked about the process of what Cascade's going to do with enrollments via the website that it gets, and so maybe those are points for further conversation.

Tillis, Daniel

I don't think we will do anything with those online applications other than have a process to get them to the correct agency to process. So, I think the that second bullet on this page can be updated to reflect the agencies doing pretty much all of that. And then I think that first bullet, the last part there, with Cascade probably needs to be removed. The customer can contact us about the programs and then we can educate them on the programs, but then we'll refer them to the agency for application. I would remove Cascade from that first bullet since we're not involved in LIHEAP applications.

Misty Velasquez

Where it says Cascade will send the customer a communication letter or email, is that going to actually happen or is that coming from Community Action as well on this?

Tillis, Daniel

If you speak to a customer on the phone and they qualify for the bill discount rate through self-declaration, is a verbal notification to the customer that they were approved and the discount percentage they were approved for enough or is the letter necessary?

Misty Velasquez

My thoughts on that from an agency standpoint is I'm going to be trying to handle all of these applications without having to talk to the customers as much as possible. They're going to submit if the ones that are submitting stuff online submit their information online and then we're going to just process those files and if it's just self-attestation, we're going to take whatever they put on that application as their self-attestation, and I don't want to have to contact every single client. So yes, I think a letter in that instance would be good. But again, I just want to know is that going to fall on Cascade or is that going to fall on Community Action? Is that something we need to figure out still because I don't know if we have to contact every single client; that's going to take up a lot of time. And when we can just be processing applications with the information that they provide when they apply online or if they're calling us, we're going to fill out a form on our end and probably not talk directly to the person who's going to be completing that file at the top. It will come in through our screener, and then it'll get sent off to our person who's going to actually complete all the information. That's kind of how I'm thinking about it, but am I thinking about that wrong?

Charlee Thompson

I wonder if the communication in that case would be and I think the communication would be on their account, so customers would know that they are now enrolled in the BDR, so not necessarily reaching out to them. But if they wanted to check, it would say that they are.

Misty Velasquez

But do customers have an online way through Cascade? Do they have an online way of logging into their account and seeing what statuses are?

Tillis, Daniel

Well, they don't for any bill discount rate applications. The way it works in Oregon today, where both the company and the agencies can approve customers for the bill discount rate is verbal notification to the customer, either from the company employee or from the agency during the application process. So it's a bit of a different process, but once we make that verbal notification, we do not have any additional written notification that goes to customers unless their tier changes; then we will notify them of that but otherwise it's just verbal, so to answer one of your questions, Misty, is we do have to figure it out, because at this time the company was not planning any communication to the customers assuming that the agencies would make that verbal notification at the time that the agency approved the customer for the bill discount rate.

Misty Velasquez

OK, so that's fine. I'm OK with that as long as I know up front that it's on us and we need to come up with the verbiage to put in or create a letter we can send out to all of our applications. I just want

time to be able to create that on our end and then is that also true for applications that are pulled up for auditing. Are we going to also be required to do 100% of the communication back and forth with the customer regarding being pulled for audit? If they're determined one way or another over income or not, or is that all that communication coming from us as well on that end?

Tillis, Daniel

We did discuss that as part of that income verification process and our current plan for that is if the customer qualifies at the same tier that they were originally qualified for, then you just verbally advise them of that as an agency. But if their tier changes and you let us know that or they don't respond at all, then that last communication will come from the company to advise the customer of the change, or that they never responded and therefore they're being removed from the program.

Yochi Zakai

Two thoughts; I'm curious to hear, but I think verbal notifications probably OK for people that have a phone call. It could be up to the CAAs to decide to follow up with a letter also. But, for folks who are enrolling via the website, it does seem like we need to notify them somehow. In Oregon, you have folks enrolling via the website, and if so, how does notification happen there?

Tillis, Daniel

Our website right now is very basic. As far as the process, the customer submits their requests online via our website and that actually goes to our customer support team that's part of our customer service organization and they make an outbound call to the customer to get the self-declared income and household size over the phone and use the calculator to determine the pledge or the discount and OLIBA pledge amount potentially if the customer has past due balance and then they advise the customer of that preliminary approval for those amounts over the phone. Then, Shannon reviews those to ensure they're accurate and only contacts the customer if something was inaccurate that was submitted by the agent. Otherwise that verbal communication is the only thing provided for those online applications. Not knowing the agencies process well enough, if when we send you an online application, you're going to process that and approve or not approve the customer, I would agree that some notification has to happen whether that's an outbound call or whether we require the customer to give us their email address on the application and we use that to send them an email with the outcome of the qualification application. There are a couple of options.

Yochi Zakai

And before we make the decision that it's all on the agency, I guess I'm curious; is there an easy system that the company could access to notify the customer via email or mail or bill insert when after the enrollment has been accepted? If there's some other thing that we could just plug into, that's an existing company process, it seems like that might be more efficient. If there isn't, then maybe it makes sense for the CAA to do it, but I just kind of want to think through that.

Tillis, Daniel

Not knowing exactly what process each agency is going to follow. I was under the impression that a lot of the qualifications were going to happen with the customer on the phone and I was assuming they would be told, you are qualified, this is the percentage discount and let's get your LIHEAP appointment scheduled, that kind of conversation happening. Is that not the process that's going to be followed for most of the agencies?

Misty Velasquez

While we aren't 100% sure because agencies haven't really had a whole lot of time to talk about processes, I know that I've been thinking about our process the entire time and it depends on how many people call us on a daily basis and how many people come through, but I know that we have to do this for PSE and Cascade, and then we're also scheduling for LIHEAP at the same time. So, a phone call with a client taking 1/2 an hour to get all the information we need, possibly versus a screener taking that information down on an application and passing it off to somebody who can just process the files really quickly and just kind of be streamline processing part of it. That's more where I'm leaning towards because I think I can do that with the amount of staff that I have, but may not have to hire a lot more staff to be able to answer and make phone calls type of thing.

Tillis, Daniel

If the screeners passed it on to someone else, that person would just process the application based on the screener's input into the application and approve or deny, and that's where the communication point needs to come in. It could be an outbound call from the screener or some other communication from the agency, or some other communication from the company--is that what I'm hearing?

Misty Velasquez

My screener won't have time to make calls back to people because we get on a daily basis anywhere from 300 to 400 phone calls a day.

Tillis, Daniel

We do have a process in Oregon where customers who qualify for LIHEAP through OHCS, they send us a file every month and we take that file that has the actual customer's income level and household size, plug it in our calculator, determine the tier, and then add the discount to the customer's account. That generates a letter out of our CC&B system to the customer to advise of the tier that they've been placed in, so we do have a mechanism that would probably allow us to do that. I would have to check to see if we could replicate that process in a way out of the portal. So, what that would look like probably is that the agency puts in the discount in the portal and then somehow that discount that's put in the portal, gets applied in a way that generates that letter as well for Washington customers. That might take a week to get to the customer; it's not going to be a fast notification necessarily like on the phone getting it done right away or a call back might be, but it's an option.

Yochi Zakai

Jen, is that an option that we should explore? It seems to me like we should but I'm curious to hear your thoughts.

Misty Velasquez

I am OK with either way. I think on our end the minute we've done the application and we put it in the system, it's just as easy for us to pull up a pre-form that we just put in the amount, the tier amount or whatever and what they're discounts going to be, print it off and send it out to the client in the mail. So, it's going to be kind of similar to the same thing. If it's part of our process we can make that happen. If we don't have to, I'm fine with that too. Either way works for me.

Yochi Zakai

Misty, I am cognizant that you have excellent processes at your organization and that there are a lot of agencies that Cascade works with and maybe I'm wrong, but my gut tells me some of them might end up doing this manually, and if Cascade has a way to automate it for everyone, that that might be a better solution.

Misty Velasquez

I agree, that's why I said if they have a way of doing it, it's fine.

Charlee Thompson

While we wait in case other agencies or anyone else wants to speak on that specific topic, I see Jen's comment. It sounds like, at least for the joint comms plan, the answer for this question should be 1.

Yochi Zakai

So it sounds like Opportunity Council prefers that Cascade, does it. So, I guess could Cascade look into it and see if it's feasible to do similar to the way that it's done in Oregon?

Tillis, Daniel

Yep, we'll do that.

Charlee Thompson

Thank you.

Yochi Zakai

And then the other thing that I wanted to bring up before we move on is the contact to the customer after they're selected for verification, because I guess I thought that the customers selected for verification were going to receive letters from both the utility and the agency because I thought when we had gone over that Avista process and we had agreed it would kind with a letter from the utility and then there would be notices and reminders from the agency over the course of the time that the customer had to respond. At the end, the kind of final letter saying you haven't responded, would come from the company as well?

Tillis, Daniel

Correct. Communication one and five comes from the company and then the others from the agency.

Charlee Thompson

If the customer qualifies, what else should they know about the program? This could be a very long answer or a short one. In the second paragraph, the discount only applies to new charges billed after enrollment. Customers should contact their local Community Action agency or Cascade for help with past due charges. Is it appropriate to say or Cascade there as well?

Tillis, Daniel

Sort of, Cascade can help them with TPA's at that point, but we can't help them with any assistance other than referring them to their agency to apply. Hopefully if they've already qualified for the bill discount program, then the agencies already had a conversation with them about LIHEAP and then CARES arrearage relief if they didn't qualify for LIHEAP or if LIHEAP didn't cover all of the past due balance.

Tillis, Daniel

The question I have here is what is the plan with this document after we review it today, should we have a few folks from the advisory group and the company work together on continuing the edits you know based on the stakeholders perspective as well as the company so that we have a good combined agreed upon document for these questions and answers and items, and make sure that it's accurate as well as far as what we were seeing in the way of how our processes are going to work. Charlee Thompson

I like the idea of having everyone interested in at least kind of continuing this to finalize it and then we can bring back a more finalized version to this group so everyone can sign off.

Yochi Zakai

I guess I'd suggest maybe if after this call the company could do a round of edits and then send it around and then maybe the advisory group could take a look at what the company does and hopefully provide written feedback. At that point we can see if we need to talk about it or if we're just OK based on the written feedback, we can do it without a meeting.

Tillis, Daniel

I think Charlee already has some edits to make, so maybe Charlee, after you make those and we continue to go through it, you could send us an updated version and we can work from that.

Charlee Thompson

So if they're no questions on those top two bullet points right now, if we could scroll down because I wanted Cascade to look at this list, how does the discount apply to customers monthly bill was included. does this is this accurate for Cascade?

Tillis, Daniel

You can remove area lighting and pump.

Gross, Jennifer

I would take off franchise fees.

Tillis, Daniel

We can have our billing team give us a full list of what it's going to apply to, but there might be one or two others we want to add. Monthly usage costs and basic charge are going to encompass most of everything that's going to apply.

Charlee Thompson

OK, great.

Misty Velasquez

Where it says it does not apply to outbuildings, what are you meaning by outbuildings? What if they have a detached garage that is heated with gas, and it's all included on the same meter?

Tillis, Daniel

That's a good point. For us we're not really going to distinguish out-buildings. If it's a charge on the customer's bill, then it's going to apply. As long as it's on the residential service, which actually might be a good FAQ to add is, do commercial customers qualify or do you know if it only applies to residential or something might be a question. Certainly, sometimes we get some small commercial

customers who might be requesting assistance and CARES doesn't apply to them, other than they help fund it through the charge on the bill. Claims charges, I'm not 100% sure what's meant by that. Can anybody elaborate on that?

Charlee Thompson

I guess it's a very specific Avista charge.

Tillis, Daniel

I'm wondering if it could be non-utility charges like damage that's caused by someone while they're digging or something like that and we have to do work to repair that, then we send the contractor or the customer the bill depending on who caused the damage?

Misty Velasquez

That's what I would think that is.

Tillis, Daniel

We would probably call it non-utility charges, right, Teri?

Sovak, Teri

We don't bill those out of this system.

Charlee Thompson

I noted that and again if there's one as you guys are doing your review and you see a different way to organize these or add or delete of course feel free. The next one is pretty straightforward. What is the discount amount that a customer will receive based on customer's income and household size and with the intention of that, where will I be able to see that I'm receiving this discount or what the discount is, and I didn't know if we have a plan for the customer to be able to see the discount on their monthly bill that's mailed to them. This might be one we return to if we need to talk about that more or if there was a process in place that I'm not thinking about.

Tillis, Daniel

Yeah, I feel like the very straightforward answer is customers will see the discount on their monthly bill, which can either be viewed on the paper bill they receive or on their online bill if they're enrolled in Cascade online self-service or whatever it is we call it. But basically, it is a line item on their bill with the actual discount percentage. I think I've shared what it looks like on the Oregon bill before, but I can certainly share that if anybody wants to see it. And the only thing about this answer is that if a customer receives Winter Help, the discount will still apply to the monthly charges, so that answer is very specific to LIHEAP.

Charlee Thompson

Maybe there are two questions there.

Tillis, Daniel

Maybe if they get LIHEAP, then that's the answer. If they get Winter Help, the discount will still apply to the customer's monthly charges or something like that. As I look at this next question where it says what should you do if you have a past due balance and it says contact your Community Action Agency or Cascade for help, if it's our team answering the question, then we would either discuss a TPA or refer them to another Community Action Agency or both of them typically. So, I think leaving

that answer that way is fine or our team is going to know if they see Cascade there, that they're going to do their job and have those discussions with the customer.

Charlee Thompson

Awesome. Next on the list for you guys, again, I think we'll need Cascade to take a look to make sure we're all in the same understanding there.

Jen Rightsell

We were trying to make a comment about but forgot to or didn't have time to make the comment about the income not used for qualifying includes the second bullet there says income for people in high school or under 18. It should be earnings for people 18 and younger in high school is what it should be because they could be 19 and still be in high school, but it actually applies to those who are 18 and under in high school and it's just earnings income.

Charlee Thompson

OK.

Misty Velasquez

Did you guys talk about veterans' benefits?

Charlee Thompson

We did not.

Misty Velasquez

We do not currently count veteran's benefits for LIHEAP. Does CNG want us to count veterans' benefits?

Tillis, Daniel

I think we're generally remaining consistent with LIHEAP. So, if that change is occurring with LIHEAP, then I think we should be consistent with that.

Misty Velasquez

So then we would need to remove the veteran's benefits, OK?

Charlee Thompson

Awesome. The last section is really reaffirming a commitment that as we have already noted that we are going to review design elements of the program. We should probably come back to the Joint Communications plan and see if we need to change anything based off of those revisions, that was all I had.

Tillis, Daniel

Thanks Charlee for taking the lead. After last week's meeting and working with the Group to get us this document, I think it's a great start to the Joint Communications plan. Does anybody else have any comments or questions on what we've reviewed on this document before we move on from this topic because I do have another question on the topic, but before we move from the document, I guess anybody have any questions or other feedback? OK, as I mentioned earlier, with our planning that we've accelerated internally, part of that is our outreach communications plan to customers on the CARES program and we will build off of outreach we typically do for Big Heart and other programs we've had. We have all the different media we'll use with letters, inserts, onserts, emails,

social or website, third party banner ads, streaming audio ads, lots of different items and I just wanted to see if this group had any input on specific tactics or if you have an opinion on that we should try-- obviously this an important new program for us to use for this. Any other thoughts that you have that you wanted to share on actual customer outreach and communications?

Corey Dahl (PCU-he/him)

Yeah, I don't know if the avenues that you pointed to would cover this, but is there any way to do some sort of pop up when a person accesses their online portal?

Tillis, Daniel

Yes.

Corey Dahl (PCU-he/him)

Especially if they may be identified as someone who is likely to be low income or is behind on their bill.

Tillis, Daniel

Yeah, we can definitely do pop-ups when people sign into their online account, and there are triggers for that, past due balance might be a good example, maybe a pop up if the customer has a past due balance or if they have a past due balance over x amount. We can definitely do that for sure. We are working on modifying both our IVR and our online account site where customers can establish payment arrangements to offer customers the option to seek energy assistance before setting up the payment arrangements. As we've talked about in the past, that work is in progress as well, but popups is a really good idea that we can add to the list.

Misty Velasquez

Our agency has a lot of outreach that we're going to be doing in the months of August and September with many, many, local events that are going to have approx. 2000 or more people at them and was curious if we are going to have any kind of advertising materials that can be ready by or soon or wording where we could create some flyers or something to be able to talk to people who are coming to these big huge events in our community?

Tillis, Daniel

I'm going to initially answer your question with a question to Andrew Roberts and just wondering if he has any thoughts on when he thinks we might know if we have approval or not on the on the program?

Roberts, Andrew (UTC)

You're talking about tariff filing?

Tillis, Daniel

Correct.

Roberts, Andrew (UTC)

I think Corey Cook is on the line and is actually leading the tariffs so I would direct that question to Corey.

Tillis, Daniel

The last question asked is if we might have the opportunity to provide any marketing material in the

CARES program for them fairly soon as they're doing outreach and in August and September and I wanted to have an idea or wanted to know if you all have an idea when we might know if the program is approved or not, kind of a timeline there, because I would kind of need to know that before we know if we can provide any marketing.

Cook, Corey (UTC)

Staff goal is for all of the current bill discount programs to become effective September 1st. As we were planning on sending that request out to all of the companies that have something in right now, today or tomorrow, so September would definitely be doable, but August is unlikely.

Tillis, Daniel

OK. When do you think we'll know that our program is definitely approved and can be effective September 1st?

Yochi Zakai

I was going to say if there's going to be a September 1st effective date looking at the Commission's open meeting calendar, it would probably end up on the August 20th no later than the August 24th open meeting. So, we're likely to have a decision on August 24th. Corey, I think what I heard you say was that you were going to ask for a September 1st effective date, right?

Cook, Corey (UTC)

Correct. That's what we discussed earlier today.

Mickelson, Christopher

Is there a reason why September 1st?

Cook, Corey (UTC)

Right now we have companies that have requested August 1st, August 11th, and another date so September 1st was the most realistic for staff that we were able to come to today and we know there's more work that needs to be done on these files as well.

Tillis, Daniel

I'd say if that timeline holds, then we could probably look to have some marketing material for you to use in September to prepare for the upcoming program year. We are starting to work on those customer communications. We have to get those ready to be used for our own purposes of direct outreach from the company to customers in that early October time frame, so we are starting to work on that and should be able to have something for you all to use even if it's fairly basic in September.

Misty Velasquez

I don't know about other agencies, but we start scheduling in September for October appointments and so we try to get all of our stuff out to clients in the August time frame. I don't know if the Commission needs or is interested in that kind of thing, and that's why I'm worried about it.

Tillis, Daniel

What are you thinking as far as what you would like to have and that'll give us some idea of what we want to work on and that's for Misty, as well as the other agencies since we would all receive them.

Misty Velasquez

I would be interested in wording to put on our website to inform our clients that our programs are changing so that they're well aware when they call us. They're not going to just get all three programs all at the same time like they normally do there; it's going to be different processes type of thing, so I'm not 100% sure other than we need to make it clear to our clients that programs are changing the way that they're used to getting energy assistance. Maybe something that describes what the BDR program is for, I'm just trying to throw something out there.

Tillis, Daniel

Are you looking for Flyers to hand out?

Misty Velasquez

Flyers and wording so we can update our website so we can hand out stuff to clients when we're at these. I mean, we're going to in the month of August; we're probably going to see a good 10,000 people.

Tillis, Daniel

I'm just hesitant to do anything in August without approval. I think September is probably the best we can do, maybe very late August right after we get approval and have stuff ready.

Misty Velasquez

As soon as possible, but I understand we have to wait.

Tillis, Daniel

Any other thoughts on customer outreach and communication as far as educational programs, how to apply, what the programs are, tactics media? Any anything else on the communication's Joint communications plan?

2. Reporting and Key Performance Indicators – Dan

Tillis, Daniel

All right, so our last topic was reporting and key performance indicators, and we only have 9 minutes left and I don't want to do this topic a disservice so I'm thinking we could spend a few minutes and start throwing together a laundry list if we want to, or we could take the same approach we took over this past week where the stakeholders get together and create a list of KPIs including and in addition to what we have in the filing already, as an example in the presentation as well that has been shared a few times and then we can all come to the next meeting ready to spend the majority of that meeting on reporting and KPIs, annual reporting that the company will provide as well as any other periodic reporting the group might want to see. Hopefully no more than quarterly, ideally. And then also what KPIs we might want to have a list of for tracking. So, is everyone good without approach to prepare for that topic for next week?

Charlee Thompson

I think that sounds good, Dan. Do you want the stakeholders to do something similar and come up with a list and then we can add, revise, etc.

Tillis, Daniel

Yeah, I think so. What does everyone think as far as what KPIs we want to track and frequency? What do we want in the annual report that gets submitted to the Commission, things like that.

Charlee Thompson

That sounds good to me.

Tillis, Daniel

OK, awesome. That is really the only agenda item for next week.

Yochi Zakai

I'll do my best to get KPI's and reporting put together for next week, but I was unable to look at the communications document this week and I'm just super busy and might not be able to do that next week. So, if Charlee's able to get a start on that or someone else, I'd appreciate it.

Charlee Thompson

I can take a crack at, by trying to get everyone on the same email and then maybe even starting a list.

3. Topics for 7/19 Meeting – All

Tillis, Daniel

So, try to cover all those topics, at least initially, next week, and keep building off of whatever we come up with next week, maybe in the same way we're going to work on the communications plan together.



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July 18, 2023

Director Amanda Maxwell
Executive Director and Secretary
Washington Utilities & Transportation Commission
621 Woodland Square Loop SE
Lacey, WA 98503

Regarding: UG-210755 Compliance Filing to Commission Request for Updates to Advisory Group Pursuant to Order 09

Dear Director Maxwell:

In compliance with Paragraph No. 78 of Order 09 in Docket No. UG-210755, Cascade Natural Gas Corporation ("Cascade") encloses for filing the WEAFF advisory meeting minutes. The following documents are submitted electronically as part of this filing:

- UG-210755-WEAF-Agenda-07-18-2023.pdf

If you have any questions, please contact me at 509.734.4549.

Sincerely,

Christopher Mickelson

Christopher Mickelson
Manager, Regulatory Affairs
Cascade Natural Gas Corporation
8113 W. Grandridge Blvd.
Kennewick, WA 99336
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Attachment

WEAF Advisory Group

Agenda

July 5, 2023

KEY TOPICS: Process walk-throughs and joint communications plan

GOALS FOR MEETING OUTCOME: Walk-through processes to discuss details, start process of developing joint communications plan

Agreements from 7/5/23 Meeting:

Income verification process – should agencies start a new application? During initial income verification attempts agencies will ask the customer to verify what they provided initially via self-declaration. But after a customer is removed from the discount rate the agencies will start a new application and require customers to provide their current income data.

If a customer verifies their income at the discount tier determined through self-declaration the company will keep the customer on the current discount tier without extending the term. If a customer qualifies for a different tier, then the company will remove the current discount tier and add the new discount tier with a new 24 month term.

1. End to End application process walk-through – Dan

Tillis, Daniel

So I thought this would be a good meeting if we have enough folks to review the flow of how the programs will work and address any questions. It will also help create our training and process documentation. We're continuing to increase our internal activity for outlining all of the processes and training, we don't have to answer every question today, but some of it would be will be helpful. I'm going to share the flow chart that we looked at several weeks ago, we all agreed to the applications for the CARES program, both the bill discount rate and the arrearage relief pledges will go through the agencies for applications. So, if a customer calls the company and expresses a need for assistance, or we identify a potential need for assistance for them through verbal or nonverbal cues i.e., stating they can't pay the bill or seeing on their account that they're significantly behind and have a past due balance, and are consistently behind, we can make that proactive inquiry by asking if they're interested in potentially receiving bill pay assistance and then the company will refer that customer to the appropriate agency. This would be based on their location, we would have discussions about a time payment arrangement, but also make that referral to the agency, that's really the company's involvement on the front end and then either by referral from the company or through other outreach by the agencies or whatever that might be, this flow starts where the agencies would get involved. So, in this case, customer calls an agency and if it's a Cascade customer, the agency will advise the customer they can attempt to qualify for the CARES program with the bill discount rate being the lead product I would say. They can utilize self-declaration of their income and household size and the agency will go through the process to collect

income and household size data from the customer and then use that table we've all looked at, for adjusting those incomes, using the same process the agencies utilized today for LIHEAP and at the same time, the agency will also advise the customer that they can potentially qualify for LIHEAP if they're eligible, if there's already an identified citizenship concern, the agency will discuss scheduling a LIHEAP appointment with the customer.

Going up to our next step, if the customer qualifies for the bill discount rate, the agency will submit that via the CNG assist portal at the same time, if the customer's LIHEAP eligible based on the that initial conversation, the agency will also schedule an appointment with the customer and put the tier of bill discount rate that the customer qualified for as well as the fact that the customer has an appointment to potentially qualify for LIHEAP. Those actions in the portal will be the company's notification that the customer is getting help or applying for LIHEAP and we will pause the collections/disconnect process at that time. As far as sending notices to these customers, we have had some internal discussion about that since our meeting and we're looking at what our options might be, but at this time we haven't changed that decision as we're not sure if we have an option to adjust that at this point, but we'll keep this group updated on that. We'll probably have that topic on the agenda here in the next couple of weeks, maybe a month at the most as we continue to work through our options. So, at that point the customer has qualified for bill discount rate based on the income and household size collection via self-declaration and scheduled a LIHEAP appointment with the agency and that information has been provided to the company via the portal. If the customer qualified for the bill discount rate, but is not LIHEAP eligible; 2 main reasons would be citizenship or FPL is 151% or higher, the agency would then see if the customer has a past due balance and shift to arrearage relief qualification and that would be via self-declaration as well. So, same process essentially just might find that the customer, if it's a citizenship issue, their income could be anywhere in the zero to 200% range for FPL and up to 80% for AMI, they would qualify for whatever tier that is. If they're in that 151 to 200% FPL tier then through self-declaration they could qualify for Tier 5, if they are AMP qualified they would also receive a discount rate and the agencies would submit that information again via the assist portal.

We also discussed while the agencies are having those discussions about bill discount rate and AMP, if the AMP doesn't cover the full past due balance, then the agencies will also have a budget discussion with the customer to talk about what time payment arrangement they might want to schedule and really set that up for the customer verbally, and then submit that in the portal as well for our company to set that up in our in our system and confirm the customer is able to pay that remaining balance off over the course of up to 24 months as we've discussed. If a customer doesn't qualify at all in any of these steps, then the process ends after the income and household size data is collected, other than a LIHEAP appointment. Any questions or comments or concerns on that the top section?

Jumping down to what happens actually at the LIHEAP appointment since the bill discount rate will already be on the account, really, the agency just goes into the LIHEAP qualification process they follow today. If they qualify for LIHEAP and that covers all of their arrears, then the agency submits the LIHEAP pledge in the assist portal and that wraps things up. If they qualified and their arrears are not fully covered at that point, then the agency will then shift to seeing what arrears relief tier the customer would qualify for based on their verified income, then both the LIHEAP and the arrears relief pledge would need to be submitted via the portal. If they're not LIHEAP qualified, during that

appointment, the agency would see if the customer would qualify for the arrearage relief via self-declaration. If they do, then that would be submitted via the portal as well. If they don't have a past due balance, then that would end the process at that point as well. Am I missing anything?

Charlee Thompson

I was going to say I think that made sense to me than a few weeks ago, so thanks for running through it.

Tillis, Daniel

You're welcome. Shannon, Teri, and team can probably use this flow to help build out the full program document and training for the agencies.

2. Income Verification process walk-through – Dan
 - a. Open a new application?

So, the next topic on the agenda is income verification. It's going to walk through that overall process outline a little bit as well, but I think there's probably 3 different directions we could go on whether or not to open a new application, we could get a consensus agreement on what that process should be; whether or not during income verification and this would include just customers who self-declared their income and household size and did not have a follow up LIHEAP appointment to go through that income verified qualification process. That would be the pull of customers who are then randomly selected each month to be provided to the agencies for income verification, and we did decide that would start in November with our first month of October qualifications and then the agencies had a question several weeks ago on whether or not you should open a new application to go through the income verification process or whether it should be working off of the old application. I think there was a lot of interest in starting a new application, so we could either agree that's the process each agency is going to follow, or we could agree that you should work off the initial application where you could do it however you want to at the agency level as long as you're getting income verification from the customer in some way other than self-declaration.

Jen Rightsell

I just wanted to say that if I can remember correctly, I thought the agencies said we would be fine working off of the same information from the October application. If they're found to be denied for not providing any information we would keep that application denied and then start a new application if they were to comply later.

Tillis, Daniel

So, if I'm understanding that correctly, what you're saying is that you would work off of the income and household size data they provided in the original application, via self-declaration. But if they can't, then you would open a new application to have them provide you updated information you can verify and base their qualification on that updated application and information, is that right?

Jen Rightsell

Yes. So basically, if they didn't provide any information and then they get taken off of BDR, they would have to reapply for it with a new application, they wouldn't be able to go back and say, OK,

they got a denial, they got taken off BDR and then they get the notice that they've been taken off here's my pay stub from October or whenever it was, we would have him at that point start over and not use the same information they would have to start a new application once they got taken off of it for not complying I mean.

Tillis, Daniel

OK, so that makes sense. So initial income verification attempts will be asking the customer to verify what they provided initially, but after they're removed, they need to start a new application to provide their current income data.

Jen Rightsell

Right. And they would have to income verify at that point or they could also self-declare again in the future if they were picked for verification and did not follow through.

Tillis, Daniel

And they can only self-declare one time per program year so if it's in the same program year, they would have to go through income verification. But if it's in the new program here, they could self-declare again.

Jen Rightsell

Yeah, sounds good.

Tillis, Daniel

That's good clarification. I did not understand that to have been the previous discussion, so that's helpful. Does anyone disagree with what Jen just went through there as far as using the information that the customer provided on their initial application via self-declaration, using that during the four month really, but three month communicated to the customer, income verification period and if customer verifies that then they stay on the discount. If they don't, then they get removed after 120 days total and then if they want to apply again then you start a new application with using the income verification process if it's in the same program year. Everybody good with that? I'm not seeing any comments or questions. Charlee says it makes sense.

Tillis, Daniel

If somebody has the document we used for the discussion on the income verification process, the Avista flow we worked off of, feel free to share it and we'll work off that. That's what I was planning to work off of, but I'm not able to find it so I'll walk through my understanding of what we've agreed to for our income verification process post self-declaration of income and household size. So, for customers who self-declare their income and household size to the agencies for qualifying for CARES and those who don't have a follow up LIHEAP appointment, after that self-declared verification process if they have that LIHEAP appointment scheduled and they show up for that, then that is the income verification process. But, if they don't schedule an appointment, then they'll be part of the pool for random selection. We will randomly select 5% from that pool each month, that 5% is at the agency level. The plan is that we will pull those the month after, so October program start in early November we randomly select that 5%. The plan is to provide those accounts to the agencies via the assist portal. We might have to start by working off of spreadsheets that would be shared via our Secure transfer portal, if we don't have it automated by then. And then the agencies can work off of those and get them back to us securely for processing. We would provide those accounts to the

agencies and at the same time the company would send the first communication to customers advising that they've been selected for income verification, after they've qualified for the CARES program via self-declaration, that kicks off the timeline of that 90-day income verification period and from that point, the agencies take over the communication and then there's four touch points from the agencies during that time to the customer. The company is not going to be prescriptive on what those should be, the agencies really have the flexibility to try to reach out the customers in multiple ways and the best way they feel is appropriate. From there, the agencies make calls, send letters and emails. We're going to try to provide email if the customer has opted into energy assistance emails. We did agree that it's a requirement that customers agree to have their information shared with the agencies in order to qualify for the CARES program, so customers are opting into allowing the company to provide that information, but really you're having that conversation with them about the income verification anyway. That's changed a little bit since we had that initial agreement, but we share information with the agencies already and it's part of the requirement for customers to allow for that to happen. After the end of that 90-day period that the agencies will start attempting to verify income and if the customer has not contacted the agency at all or has not provided income verification, then we'll give them a 30-day grace period, so a total of 120 days from initial selection of random income verification. If after that, within that 30-day period the customer contacts the agency to provide verification, they'll remain on the program. If they don't, then after that 120-day period the customer will be removed from the bill discount rate program, and we'll have to go through income verification with the agencies if they want to be added back in. If they do go through that income verification within roughly 180 days total, then the company will add them back at the income verified Tier and provide the customer with a credit for any discounts they missed during that period they were removed. So, that's if the customer responds and verifies at the same tier, then they'll remain of that tier. If they verify and the tier is higher or lower than the agencies will provide that information to the company and the company will adjust the customers' bill discount rate tier. If the customer is removed from the program or they're tier changes, then the company will send notification of the removal from the program or discount change. If the customer verifies at the tier they were originally placed in, then the agency will just advise the customer of that, and no additional communication will be sent.

I don't know if I said this or not, but if we have the assist portal ready by the time we start the income verification process, then the agencies will submit the outcome of the verification attempts to the company for each customer via the portal. If not, we will use spreadsheets. Any questions, comments.

Charlee Thompson

I have a quick question, Dan. When customers come in and they qualify either for the tier that they declared or for different tier we did agree that their term would be extended, correct?

Tillis, Daniel

If they verify at their current tier, I don't think we agreed that their term would be extended, but if they verify at a new tier, I think we did agree their term would be extended.

Charlee Thompson

Thank you.

Tillis, Daniel

The reason we weren't going to extend it, if they verify for the existing tiers that doesn't require us to touch their account at all. But if they verified for a new tier and then we have to change the discount percentage and then we could just adjust the end date at that time.

Charlee Thompson

I'll go back and look at my notes on that. This program versus Avista's NPS, I think all kinds of have slightly different decisions on this particular topic. If anyone else remembers that differently, let me know.

Tillis, Daniel

We can open it up right now and see if that's the decision we want to stick with and it's a pretty small amount of customers who are going through the process so if we wanted to take those who did complete the verification process and renew their end date we could, Teri, I don't know if you feel like that would create any issues with the discount and if it's going to get us back into that prorated conversation or anything like that. But what are your thoughts there on billing issues that that could create?

Sovak, Teri

Billing issues just to extend the program if the customers verify at a new tier?

Tillis, Daniel

No, if they verify the new tier, I think we've agreed that we'll just remove the old tier and add the new tier with the new end date. If they verify the tier they initially qualify for and then I think the thought process there is, they're going through the income verification process so they've really qualified again, should we give them a full 24 months from that period instead of whatever is left of the 24 months?

Sovak, Teri

I don't think that there would necessarily be a billing issue other than having to touch the account when really they've qualified for what they said in the beginning through self-declaration. I don't think there would be a billing issue, it would just be a matter of is it necessary to touch that account again.

Charlee Thompson

That's good. I'm glad that there's not a billing issue. I lean towards touching the account again and extending it, even though that would be work to touch the account again. I think that's what Avista and PSE's design is. Some customers might be selected for random verification at the very end of their term and if they have to go through the income verification process like one month or two months or something before they have to come back into re-attest and go through a potential verification again soon after that, then it can be a burden on those customers. So, extending it when they do verify at that time would eliminate that potential burden. I wish Yochi and Corey were here to give some thoughts on that, but I'm definitely very curious for CAP agency thoughts on that as well.

Tillis, Daniel

Any thoughts from the agencies?

Jen Rightsell

If they qualify for a new tier that's different from when they originally applied, then yes, you update that and extend. I have no comment either way of if they qualified for the same tier, whether or not that should be like started over and extended, that will be up to Cascade I guess.

Mickelson, Christopher

Dan, can you remind me that the game plan is we pick 5% out of the pool from the previous month so these customers would only have been on the program for a month, is that correct? So, we won't really fall into a situation that Charlee brought up where they could be toward the end of their 24-month program.

Tillis, Daniel

Correct.

Mickelson, Christopher

So, in that instance, I don't think touching the account makes sense since it's only been a month. Extending it a month really doesn't make a lot of sense.

Tillis, Daniel

Yeah, more than likely the furthest away from their initial qualification that they might be out is about four months, that's if they wait until the very end to respond.

Mickelson, Christopher

Either way it's fairly early from when they sign up.

Tillis, Daniel

Correct.

Mickelson, Christopher

Personally, I would vote against touching the account again unless we find out their new income puts them in a different tier other than what they're currently getting.

Sovak, Teri

Just to piggyback off of what Chris was saying, my only concern to do it at the time that they qualify for a new tier would be even though it's not a billing issue, it just becomes more complex and difficult to explain a two-year stint on this. I just feel like it'd be difficult to explain or ever really know from when they started, why it extended, it could just involve a lot of research.

Tillis, Daniel

I think it's going to be really interesting as we get into this to see what percent of customers are requalifying every year anyways, based on getting LIHEAP every year, even state LIHEAP now, potentially as that program rolls out they will automatically re-enroll for 24 more months from that that point. We're not there yet in Oregon so we don't have Oregon to look at to say what percentage of the time this is happening, but we will be in about 3 months or so we'll start getting some insight there.

Charlee Thompson

I think that makes sense, thanks for pointing that out.

Tillis, Daniel

Anything else on the income verification process?

3. Initial discuss on joint communications plan – Dan

The last topic on the agenda, other than meeting topics for next week's meeting is the initial touch point on the joint communications plan and I don't know if we have enough folks on the meeting today to go into too much detail on this, but to get to the items for this week I looked through the presentation that Jennifer has created and we've worked off of in several meetings, and I looked at the pending items that we haven't discussed much yet and this is one of those that is on our list to work through. Charlee, any insight on anything the other utilities have discussed on this?

Charlee Thompson

Avista is the one that has gotten through this, PSE still has not, but what we started discussing with Avista was in the annual process of CARES or BDR, where would we want to have similar or be on the same page between the company and the agencies. One of those things was every year before the energy assistance season really gets started is having similar communications between the agencies and the company like a program announcement such as here's what's coming and the details of CARES and how to apply, when to apply and how it works. So just having the same communication between the two entities and far enough in advance of a new assistance season, but kind of being able to have a follow up. Any additional announcements about program design changes or how to enroll in the program and things like that should be the same between the two. Maybe FAQ's like if they're asking the basic questions such as what does Cascade and local Community Action agency do with customer income and household information, does being on the program mean that I can no longer get other energy assistance or you kind of like those basic questions. What happens after I sign up? I think that list of FAQ's is where we're at right now with Avista, the emphasis on having the same answer and using the same terminology, because I think there's been a few points where we've talked about in this group and others said we'll use this word and not that word. And FAQ's that are specific to Cascade about the customer portal or from the customer side of things, what will they see? I think we have room here with Cascade to build off of that, but also start diving into what else we think is needed for a specific Cascade and agency communications plan.

Tillis, Daniel

Thank you, that's really helpful. We really haven't thought much about FAQ's, but we'll have to start putting together a list of those.

Charlee Thompson

Now that I'm thinking about that there's the customer facing FAQ and there's also the agency and company side answers to the media about the inquiries of fraud, having our answers ready and similar or the same for those types of questions as well the internal questions.

Tillis, Daniel

I know you had mentioned we address the concerns from other customers about the self-declaration process and the potential for fraud and good use of customer funds, ratepayer funds, I

recall Yochi wanting to have an upfront joint communications plan as well as far as how we communicate the launch of the new program to Cascade customers in Washington.

4. Topics for 7/12 Meeting – All

So, I'm thinking maybe jumping ahead to the next item is maybe we keep the Joint Communications plan discussion on the agenda as the primary topic for next week's meeting and then I was thinking another topic could be KPI. Reporting is one of the other areas where we still need to discuss and work out and that's probably enough for a meeting. I think on the Joint communications plan, Charlee, maybe if ahead of next week's meeting, you could talk to Yochi and Corey and anyone else who should be involved in the conversation and just come to the meeting with the group's recommendations on what all you'd like to see in a joint communications plan, both the initial communication and customer communication and FAQs and all of those things that kind of want to see as part of the communications plan. I think we can work from there. I'm not trying to cut this discussion short, but also if we're not ready to discuss it today in depth, I don't want to drag it out either. Does anybody else have any thoughts on the Joint Communications plan? All right, I think we have our topics for next week. If you haven't seen Jennifer Gross's email from this morning, we did submit the filing on Friday for the program and deferral and everything else so that is a great milestone to have achieved together and on time which is great, now we just wait until we get action from Commission staff and on the agenda to hopefully get approval quickly. I mentioned earlier that we're continuing to get more serious about our planning internally, now that we've gotten to this point of having the program fully designed and we have a meeting in the next several days to bring everybody who's going to be involved together to lay out everything that we have to get done between now and October 1st, hopefully sooner for a lot of the items. I don't see anything that presents any risk for us to miss that date at this point and if something does present a risk, we will find a work around for it until we get it taken care of. Thanks everyone for all the work you've done on this, I think we're in a pretty good place. Any other comments or questions or topics for today? Alright, have a great rest of your day and we'll talk on the 12th.

July 21, 2023

Director Amanda Maxwell
Executive Director and Secretary
Washington Utilities & Transportation Commission
621 Woodland Square Loop SE
Lacey, WA 98503

Regarding: UG-210755 Compliance Filing to Commission Request for Updates to Advisory Group Pursuant to Order 09

Dear Director Maxwell:

In compliance with Paragraph No. 78 of Order 09 in Docket No. UG-210755, Cascade Natural Gas Corporation (“Cascade”) encloses for filing the WEAf advisory meeting minutes. The following documents are submitted electronically as part of this filing:

- UG-210755-WEAF-Agenda-07-21-2023.pdf
- UG-210755-WEAF-Washington-2023-Li-Propensity-Results-2023-EAAG-07-21-2023.ppt

If you have any questions, please contact me at 509.734.4549.

Sincerely,

Christopher Mickelson

Christopher Mickelson
Manager, Regulatory Affairs
Cascade Natural Gas Corporation
8113 W. Grandridge Blvd.
Kennewick, WA 99336
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Attachment



WEAF Advisory Group Meeting
July 19, 2023 2:00 – 3:30pm Pacific

Welcome! Please sign in to record your attendance by adding your name and organization in the chat.

Advisory Group Member	Contact
Blue Mountain Action Council	Sylvia Schaefer
Community Action Connections	Dalia Ochoa
Community Action of Lewis, Mason, & Thurston Counties	Dale Lewis, Sandra Koch
Coastal Community Action Program	Debbie Gregg
Chelan-Douglas Community Action Council	Vern Gurnard, Kristi Hills, Alan Walker
Kitsap Community Resources	Kandi Balandran
Lower Columbia Community Action Center	Deanna Dahlberg, Kathy Bates
NW Community Action Center	Jose Alvarez, Todd Hilmes
OIC of Washington	Heidi Silva, Casandra Ochoa, Candi Jaeger
Opportunity Council	Marie Stangeland, Lorena Shah
Community Action of Skagit County	Misty Velasquez
Snohomish County Human Services Dept	Constance Hockett, Manu Morgan
WUTC Staff	Heather Moline, Andrew Roberts, Andy Sellards, Corey Cook, Jacque Hawkins-Jones
The Energy Project	Ross Quigley, Yochi Zakai
Public Counsel	Corey Dahl
NW Energy Coalition	Charlee Thompson
Department of Commerce	Michelle DeBell
Cascade Natural Gas	
Mark Chiles, VP of Regulatory Affairs & Customer Service	Lori Blattner, Dir Regulatory Affairs
Dan Tillis, Dir Customer Experience	Chris Mickelson, Mgr Regulatory Affairs
Teri Sovak, Mgr Customer Service, Credit & Collections	Noemi Ortiz, Mgr OR Conservation & Weatherization
Shannon Steed, Consumer Specialist	Jennifer Gross, Regulatory Analyst

1. Forefront Economics Propensity Analysis presentation – *Dan Tillis / Mark Thompson*

Tillis, Daniel

Just a reminder that we no longer take roll call on these meetings, please indicate in chat that you're here and which group you're representing, we would appreciate that for attendance purposes. I pasted this week's agenda into the chat, there is a slight modification to the agenda that Shannon sent out, we have a couple of updates that we want to provide you on both the filing for CARES, some changes that have occurred there as far as the original filing and then the current status of the WEAF fund for the 2022/23 program year, so you'll see that info added to the agenda, but we're going to kick it off today with Mark Thompson from Forefront Economics and hopefully you will all recall that late last year, early this year we engaged Mark to start having discussions about low income propensity models and I think

at some point we were asked if we ever use any external third party data to try to identify likely low income customers and we had not up to that point. -Mark has done several projects for us in the past and most recently the low income needs assessment that this group has seen and hopefully completely read through that informed our work for designing the CARES program and Mark had also, several years ago, done a smaller low income propensity model for us in Yakima, WA, and he recalled that when we started having the discussions and felt he could continue the work from there and build on that to create a low income propensity model for the entire Cascade serving territory in Washington. He's been working on it for several months and finished a month to six weeks ago. He reviewed it with us internally and this was our next opportunity to get in front of the full advisory group for Mark to review his findings and so he has a presentation he'll share and go through and if you have any questions, feel free to raise your hand or put them in the chat and Mark we will try to stop you if somebody raises their hand and obviously we'll save some time for questions at the end as well. So, with that, Mark, I'll turn it over to you.

Mark Thompson

Thanks, Dan. Stop me if there are questions that come up. It's good to be with you all again and like Dan said, we've completed the analysis just fairly recently and look forward to sharing them with you. There are some [contrastcontrasts](#) to how we did the Yakima study and I'll point those out along the way, some interesting differences that are real positive in terms of going forward with this type of analysis both in this study and in the future. So, a little review of the agenda, we've gone through introductions but a little about me for those of you who weren't in the January meeting, my name's Mark Thompson, I'm President of Forefront Economics, a company I started almost 30 years ago now, to do quantitative analysis for the energy industry and we really focus on what's going on behind the meter. Some of that is how are the customers using the energy, what affects customer usage, how income programs affect consumption and other areas, and energy efficiency programs demand side management planning and in general those kinds of things. So, with that, I'll just jump right in, and I look forward to a questions and discussions either as we go along or at the end either way. Here is just a little summary of objectives and approach and things that are sort of redundant from what we talked about in January I'll skip over or go over them fairly quickly to get to the meat of the results, which I know is where most people's interest is today and also to be respectful of your time, you've got quite an agenda today. It's good to remind ourselves of the objectives and overview of approach; what we're trying to do here is develop a low income or a complete residential database with data on every residential customer to help characterize low-income program participants from the rest of the population and then also use that data to model and be able to predict or score the likelihood of a residential customer having an interest in participating in a low-income program. So, the approach we use is to gather a lot of Cascade customer information records and we'll go through that information as well, and also pull in secondary data and combine the two and from that then develop statistical models, use those models then to score, which just means to develop an estimate of the probability that each individual premise level customer would participate or not participate in a in a low-income program. Data development is a big part of any kind of empirical project and this one is especially true, we collected a lot of information from Cascade around the things like typical billing information, usage and dollar billed and that sort of thing, but also low-income participation records and payment data. So, how many late payments occurred in a string of customer records and what was the average arrearage balance through time, we can put information in the model along with every other variable to help understand what's going on. We have two kinds of secondary data, one is at the household level, and that's the purchased data where we did buy data for this project and from that [datadata](#), we get information such as household income, premise size, age, and market value and that's at the household level. There are a number of issues with it, but one of the big issues is coverage and I'll get into that later. Secondary data is census at the census tract level, we have the

energy burden data and also concentration of low-income households within a census tract; what percentage of households in that census tract are low income? This is essentially the same source data that we used for the energy burden analysis that Dan mentioned during the introduction that we did for you last year and of that, the one difference is simply in the granularity of the data. Last year, we did all of our analysis at the county level in this kind of work we want to get down to as close to the premise as we can, that energy burden data is available down to the census tract level, so we acquired that data down to the census tract level and merged it in with all of this other information. We have service premise records at the service address and related information like county and of course if we know the address we know a lot of information about location, and this serves as the basic unit of analysis. [Next](#)Next, we will talk about the Energy Bill Assistance Program history. What we see here in this table is the summary of the actual data that we had on program participation, program participation really serves to identify the dependent variable as whether or not a residence is a low-income program participant or not. Basically 01 a binary variable that says yes, this premise is a low-income program participant and no, this isn't and we're talking about Energy Bill assistance programs, the four programs for which we have history for are listed below. You can see that there's a real uptick in participation levels during the pandemic of 2021-2022 and you see that in the Big Heart grant and also to some extent you see it in the LIHEAP data as well. So, combining the CIS, Cascades Customer Information System with secondary addresses is a labor-intensive process but it begins with address standardization to improve the match results, so we process every address both from the Cascade side and in the secondary household data that we received to improve the match rates because we're matching on address and to the extent the address is in one way in one data set and then in a different way in another data set. If we standardize those two data sets, we can improve the match rate and then the census tract numbers, but through that process we also get some other information too, one of which is census tract numbers and that's very important because it allows us to tie back to different secondary data. We not only got the 2020 census tract numbers, but we also went back and got 2010 census tract numbers as well through this process and the reason that's important is because the [lead-LEAD](#) data, the low-income energy assistance data that gives us energy burden uses a 2010 census tract to identify that data, so we need that to match it back to the CIS records. We run these match routines, combine the information, and then add in the [lead-LEAD](#) data by the census tract and at the end we have a pretty rich data set of content for premises and we have the Cascade data, the household data, and the census tract, or rather the [lead-LEAD](#) data, the energy burden data all of that for a household now. Of course, the energy burden data for all households within the census tract will have that same value, but it's still pretty rich information.

For geocode and match rates, the first table shows that there was a very high level of geocoding. This is the part of the address standardization process, to say that a home was geocoded indicates that the street address was found in the geocoding record and so you've matched the record to a street address file from that street address file, then you can append the census tract. You can even put latitude, longitude data for mapping things like that, so all of that kind of information we added to the record, and you can see here very high rates, the 94% for Cascades Records, 98% for household data, those are very high geocode rates, meaning that we have really good quality street address even going into it. But maybe we improved them slightly to the match results and then on the match results, we're taking Cascade records and the household records and putting the two together and we found [104,000 Cascade](#)104,000 Cascade premises were matched to the household data, that's 53% of the geocoding results. That's ~~a fair~~ a fair amount lower than I would prefer, I'd rather see in the 70-80% range and that's what I'm typically used to seeing. I started looking into the reasons why and discussions back and forth with the data vendor and found out that because of concerns about sharing privacy data, they have these business rules to prevent the mismatch of occupant and attribute data and so that prevented them from sharing some records just to prevent the disclosure of information that they're

not allowed to disclose. So, in a way, it improves the quality of what we did match because we know it's for that particular premise and household, we have a good match, but the at the same time it lowers the level of availability of that information across the study as a whole. We still have over 100,000 premises with this ~~information, plenty~~ ~~information, plenty~~ of premises to do that analysis—. So, comparing some of these attributes in the enhanced database, we're looking at a table for Washington, we can see the data is broken into three kinds of variables, Cascade data, secondary household data, and then front data from ~~lead~~ ~~LEAD~~, the low-income energy assistance data and you can see the two columns on the right, those are energy bill assistance participant, yes or no. Again, that's binary and to be in the yes column that premise had to have participated in one of those programs we looked at earlier over that 2018-2022 period and then if we compare those premises to no premises we can see some interesting contrast jump out here on the Cascade side, somewhat higher energy bill for the non-participant and a high consumption, much higher turnover for energy assistance program participants ~~then~~ ~~than~~ nonparticipants. These are how many times an account turns over a period of time. One of the biggest contrasts is in this next variable down, the average monthly arrearage balance, nearly ten times the balance of a participant ~~then~~ ~~than~~ a nonparticipant and all that makes sense, more late payments as well, again these are the households that are struggling with energy bills most likely and need assistance and so it stands to reason that you would see these kinds of relationships in the data and in fact we are seeing them. The secondary information is very interesting as well, it's not too surprising in terms of things like program participants have significantly less income, they live in older homes and homes that have less market value, they're smaller, probably ~~any of~~ none of that is too surprising. What might be surprising though, is that when we combine that with the therm consumption from the Cascade side is the energy intensity results we see on the ~~energy~~ ~~Energy~~ Assistance program participant side has a much higher energy intensity therms per square foot ~~then~~ ~~than~~ we see from non-participants and then on the ~~lead~~ ~~LEAD~~ data. This is all kind of in line, there aren't as extreme differences as we see in the household data, and part of this gets back to we're not dealing with household level data when we're talking about ~~LEAD~~ ~~lead~~, we're dealing with census tract ~~ck~~ data, which is averaged across many households. So, because of that, the differences between census tract ~~cks~~ ~~centrally~~ ~~essentially~~ tends to be smaller than the differences that are observed when you look at differences between households. At any rate, you do still see the differences in household income, which is lower among participants than nonparticipants, the percentage of gas heated with less than 150% of the federal poverty level is higher so higher concentration of low-income gas, heated homes you again you would probably expect that higher energy burden in total and higher electric and natural gas energy burdens as well. So, that's just some comparing and contrast that's possible from this enriched data set.

So, propensity models, I'll just introduce the propensity model from this first bullet and then skip the rest, and I've already covered this in January, but feel free to go back and read this or some examples of propensity models and use, but it's really just a model to explain or predict the probability of any particular given event or outcome. In this case, we're looking at the probability of a premise participating in a low-income energy assistance program and the explanatory variables that we try to put in the model are what we call drivers to determine the outcome in another way. In other words, that's basically what a propensity model is, and the last major bullet on this slide talking about scoring is another important concept that I want to emphasize. Scoring is once we have a model, we take that model and apply it to every premise for which we have the data for and estimate a probability across the board so essentially for all customers, we're trying to score every customer for which we have data for from the model that we estimated from a sample of data and that then gives us our prediction of the probability of low-income program participation, and we can use that to channel our marketing efforts. Another concept here is a decile and as we score all of the customer homes as to probability of participation, we have an estimated probability when we sort in order from highest probability to lowest and we take the first 10%, that's the decile one; it gives us the highest 10% of the customer base with

the highest probability of participation, decile 2 is the next 10% and so on. So, a little bit about ~~scoring,~~ ~~thescoreing, the~~ way the model is estimated, we took a sample of 5000 premises of program participants and 5000 nonparticipants so it's a balanced sample and we're looking at the 2018-22 period to define a participant, so 10,000 total records in the sample. The model that we talked about, basically the probability of participation is what we're trying to estimate, and the model is comprised of variables which are represented by the X's in this equation, so these are the driver variables things like age of home or average arrearage balance, it's things like that and the estimated model are these beta terms the B coefficients, B1, B2 etc. So, we estimated these models, and we were going for two kinds of models and going into this talking with Cascade, we were wanting to try to come up with at least a comparison that said, OK, we're going after this household data and purchasing it and it's an expensive proposition, what if we were just to use Cascade and census data, how would that compare to a model that we had available both Cascade Census and this purchased data, how would the two models compare? One objective we had was to develop two models from each of those classes and models, one with all of the variables available and one with just a variables from Cascade and census data. We really looked at dozens of combinations of variables in the analysis of the final model or the best model, and the final model was selected had to meet a couple of criteria, one, every variable to stay in the model had to be not only statistically significant, but correctly signed. For example, if you had a model that said the higher the income, the more likely the household is to participate in a low-income program, well, that's nonsense so I would throw the income variable out and go from there.

Tillis, Daniel

We have a question from Jen Rightsell from Opportunity Council. She asked, where the participants of 5000 were those premises or customers?

Mark Thompson

Those are premises. We're looking at the customer record from those customers that were in those premises, but the basic unit of analysis was a premise. That's important to keep in mind.

Yochi Zakai

So am I understanding correctly that you evaluated the inclusion of purchased household income data along with other variables when deciding what variables to use in your propensity model?

Mark Thompson

Yes, that's correct. And then we use each of these models to predict participation levels and from these results we can estimate a number of things in order to evaluate and compare different models, and so we took these two models that were sort of best in class, again the models were one with all of the variables available, both purchased data and other data, and a model that only included basically the free stuff, the Cascade variables, and the data from public sources such as census. From these two models we compared what's called the receiver operating characteristics curve, those are the ~~rock-ROC~~ curve for those that are familiar with this type of analysis, but it's basically just a way to compare how well the model predicted, and there the ~~rock-ROC~~ values run at range from .5 to 1, and the higher the better, and values that are between .8 and .9 are generally considered excellent, and you can see in the bottom table here we've got the two models. First one listed is the one that has all of the variables, including purchased data in it and the second one is the model that's only Cascade and census variable models. Now notice that the one with all of the variables in it because of the availability of secondary data, which is somewhat restricted for data privacy issues, the number of observations that we have to work with is lower, but still, that's a very huge sample. I'm not too concerned at all with the sample number, there are other issues associated with that that are more concerning, but not the sample

number itself, so there's plenty of observations. You can see nearly twice as many as our premises are available to estimate the Cascade and census variable model and then we looked at this ~~rock-ROC~~ curve compared between the two and while there is a slightly higher ~~rock-ROC~~ curve for all variables model, it's really the difference between those two values is immaterial. It's insignificant and ~~essentially~~essentially, we're saying that both of these models have excellent predictive accuracy, and neither model stands out as better than the other.

Let's talk about the contents of each model in terms of the variables. These are the X's that we looked at before, we had probability on the left and the X's on the right went, these are the X's into the model and we can see the variable name on the far left and then in the middle section we have all data sources model, the best model from that category and three columns under that the impact on the probability, that means what direction does this move when household income goes up, the probability of participation goes down so there's an inverse or a negative association between the two, that's as expected. You would expect that statistical significance is high in this case and the influence in other words, when this variable changes, how much does the probability of change the estimated probability. It's also high so we can see here then how this best all data sources model what's in it and kind of the level of how statistically significant influence each of these drivers have. It's interesting to take a look at the contents, the first three variables are from the secondary data that was purchased, we've got household income, market value of home and the age of home, and they all have high influence, and all are highly statistical significant except age, which is still pretty significant at moderately significant and then therms per square foot is derived from both the secondary data and Cascade, we wouldn't have this variable had we not purchased the data, and it's highly significant with moderate levels of influence. And then the next 3 variables, the average monthly arrearage balance and number of late payments and also the late payments during the moratorium as a separate variable just to test if there's any difference there, we see all three of those are highly statistically significant and highly influential, that's followed by account turnover, also highly significant and highly influential. The last two variables shown under the best all data sources, model energy burden and the concentration of low-income homes in the census tract are also in the model and are there because of statistical significance, and although they have a weak influence, they still have an influence that is important in the model. So that's all data sources model and then if we look at what did we come up with when we only include Cascade and census only variables in the model, how did that compare? We can see here that in terms of commonality, starting with average monthly arrearage they share the next 6 variables, so they have in common these the six variables average monthly arrearage, late payments, late payments during the moratorium, account turnover, energy burden and concentration of low income households in the census tract, all in the Cascade and census only model that we're looking at on the far right here, all of those variables are highly significant, those six I just went through. The first four of which are also highly influential and like we saw in all variables model including the secondary purchased data, these ~~lead-LEAD~~ data energy burden and the concentration of ~~low-income~~low-income homes are weekly influential but still important in the model, so I kept them there, by the way, is not uncommon. I would expect that because the predictive power of a variable is highly dependent on if you're trying to predict what a household will do if you have household data for that household, that's far more valuable typically than if you have data on the average of all their neighbors or the average of all their neighborhood, or the average of all their zip code, or the average of all their ~~accounting-county~~ by the time you get up to the county level, you might as well forget it, it's hardly even worth using in a model. So, what we're seeing here, we have better than county level we have census tract level data, but it's still not anywhere as useful as household specific data. Then we also have 4 variables that show up in the Cascade and census only model that did not make all data sources model and those are the annual energy bill and premise type, is this a multifamily or a manufactured home? You can see that both of those, if you're either a multifamily home or a manufactured home, then the probability of participating in a ~~low-income~~low-

income program goes up and then have there been any nonpayment disconnects and it's weakly statistically significant but still statistically significant and it seems to have a high influence on the predictive probability, so it was kept in there. This is important for comparing and contrasting the two classes of models that we looked at and for understanding what's in each, so happy to entertain any questions if you have any or we could go on and then talk about the results further.

Yochi Zakai

I'd like to just talk about that last one, the nonpayment disconnect. So, what you're saying is that there is a statistically significant correlation between customers who have been disconnected for nonpayment in the past and customers who are low income, but it's just not as high of a statistical correlation as the other variables that you've identified?

Mark Thompson

Exactly, yes.

Yochi Zakai

I don't know about the correlation, but it makes sense that a customer who has been disconnected in the past is more likely to be low income, so thank you.

Mark Thompson

I actually expected it to be significantly higher, I even expected it to come in all data sources model, so this had a weaker influence or weaker statistical correlation than I expected, but it did make this Cascade and census only model. It tells us how well a model performs at identifying highly likely prospects for participation relative to a baseline, which is basically the average level of participation across the entire customer record database, the green variable line that we're looking at is the all variables model and the blue line is the Cascade only Cascade and census only variables model and that black straight line at the bottom there is baseline at one and the baseline says this is the average level of program participation. So, when we see values of six and seven, we're saying that there are six and seven times more likely to participate in a low-income program in this first decile of customers. That's the other thing I should describe here, we're looking across the bottom here, deciles 1 through 10 and remember when I was talking about deciles, decile 1 represents 10% of the customers scored that have the highest probability of program participation that 10% ~~are~~ 6 to 7 times more likely based on these models to participate in a low income program than what we find in the average of the customer base. Likewise, in decile 2 we find an improvement over the black line, but not a whole lot, there is still an improvement, and then somewhere about halfway between two and three we break even so that gives us a sense of how deep we can go on our customer list before we hit diminishing returns in terms of ~~a~~-recruiting people into low-income energy assistance program participation. But another important take away from here is that we're not seeing all variables model significantly outperforming the Cascade model, in fact, it's even a little lower, again, I don't think that difference is meaningful 6 or 7, both are good at ferreting out high probability participants, but neither has a significant advantage, and I think that's important finding. Well, if we take a look at these deciles more closely and we can profile a customer, in other words, what is an average customer in decile 1 look like compared to an average customer and say decile 2 or 3 and then in the lower deciles, in other words, going from left to right across this table from one on down to the last column, we have increasingly less likelihood of participating in a low income energy bill assistance program. You see household income, it goes steadily up as we move across so that makes sense, market value of home same thing, and that makes sense. I don't see many real surprises here, but there are some interesting attributes, and you can kind of take a look for yourself. The energy intensity as we saw before high

likelihood of participation, customers tend to be more energy intensive than low likelihood of program participation, so I won't go through all of these in interest of time, but that's there for your perusing. And of course, we use this to score all customers and that's exactly what we did you can use this result to identify who are your most likely prospects, what premises should you be marketing to, and of course, you're marketing to the customers that don't reside in those premises. So which customers should you be spending your efforts to recruit into an energy assistance program if you didn't want to try to recruit your entire customer base, and then you can also do things like identify neighborhoods or basically census tracts with the highest likelihood of program participation. This particular table on the right shows by census tract sorted in declining order of decile 1 and 2 premises, these are the premises most likely to participate in a ~~low income~~low-income program and you can see this census tract 700 in Yakima County has the most decile 1 and 2 premises. Maybe we can go in there and have a neighborhood event or something and recruit, or somehow concentrate recruitment efforts into these high likely census tracts or high concentration census tracts. So, with that, I've gone through my prepared ~~exam~~ comments and happy to stick around for any discussion or questions and you might have.

Corey Dahl (PCU-he/him) ~~(Guest)~~

Based on your findings in this model, what are some of the suggested applications you'd have, and I guess kicking that over to folks from Cascade, what do you anticipate this this modeling might be used for?

Tillis, Daniel

Mark could certainly share his ideas, I think on the previous slide he had a suggestion of how you might target the top 25% of a certain group or maybe use the data to do an outreach activity in a certain neighborhood that ~~is~~ has a higher percentage of ~~low income~~low-income premises. ~~s~~Since we've had the data, we've started working to add account information to the premises. So again, this study and the detailed data that in addition to this presentation that Mark provided us as part of the model, is all premise level, so we've asked our IT team to add current accounts at those premises, aging of the past due balances, whether or not the account is in a collections or severance process, energy assistance history, ~~of~~ all of that type of data. I just wanted to share what Mark had shared in case you missed it, but our plan from a practical standpoint is to utilize that data to try to figure out better ways to reach the decile 1 and 2 customers. That's really where our focus will be because those are the deciles that are likely to be ~~low~~-income premises, as we look at the data and we sort it by highest ~~areas~~arrears just to lowest arrearages and then maybe ~~how~~have they received assistance or not, if the answer is no, those customers have a past due balance, but they're not engaging in ~~in~~ the energy assistance process, so how do we more effectively get the message to them that those options are available, especially as we start to roll out CARES here in about 2 months. It's interesting, while we've been talking, ~~and~~ we just got the most current update from our IT team to review, as far ~~as~~ this data we forgot to ask you to add this and I hope to have final version of that data, from there we'll start working on what our options are for creatively trying to reach those customers and improve our outreach. We can more effectively spend funds on more targeted outreach, ~~hopefully with having up~~ to those premises versus ~~near~~ the shotgun approach. I think the other practical approach could be working with the agencies to provide data for their areas and collaborate on what they can do for events in additional outreach and through their own work and partnerships with the CBO, community based organizations, and groups like that. We don't have any brilliant ideas at this moment, but that's how we're thinking of utilizing the data and I think those are all great ideas and I'll just also add that you could even use it as a mailer to send out to the highest prospect for example, mail recruitment isn't always the best approach, but that's one idea of how it could be used. Right ~~now~~now, when we send out messages about the programs, we probably

~~should send~~ them to every customer not having previously had this data. ~~!~~In the future we can send something periodically to every customer but for those customers who are likely living in low-income premises and have a past due balance is something we should send a postcard or provide an insert for or send an email to if we have their email address on a more regular basis to try to reach them in various ways and more frequently so that hopefully they eventually ~~get recognized~~ recognize that they have help available for them. Or, is there a way for us to more effectively and more frequently partner with the agencies to say how can we reach these customers in this neighborhood because not only are they likely low-income premises but you know X number of them ~~have~~ currently have a past due balance so part of the plan as we have the final data from our IT team and we have time to spend with that data and analyze it is to bring some of that data to the group to talk about it and brainstorm ideas on different approaches.

Mark Thompson

If I could just add maybe in wrapping my comments, but I think that one of the biggest takeaways for me from the findings was just to the emphasis of just how valuable Cascade's own records are in this whole question of identifying prospects for low-income energy assistance. If you think about it, I don't think it's surprising either, the utility has so much information that is unique to their own customer base and unique to that customer's interaction with their product and services. That doesn't come from anywhere else and in many ways it's more important than other secondary data.

Jen Rightsell

I just wanted to say that when we're thinking of ways to reach populations that we haven't been able to reach for low-income households or possible low-income households, we have come across several people when they come in for assistance that they would have bills that they have not opened, so think of that if you're thinking about doing inserts. They might reach some but then again, there's going to be people who will avoid opening the bill so in their minds, if I don't see it, it's not real, so mailers may be tossed away. And then also phone calls, they think any phone calls from utilities might be a collection call, so just wanted to you to keep those thoughts in, in our minds, while we're thinking of how to do outreach.

Tillis, Daniel

Those are very valid thoughts, and you know definitely as part of the current challenge we have ~~with getting~~with getting the word out on assistance that's available and that's where we really want the partnership with this group to think creatively on how we do this. A couple of ideas, as you were talking, are can we have our service mechanics go out to some of these and just put a CARES door tag on the door, not going out for disconnect, but you have a resource today to go out and put 100 of these in this neighborhood at these addresses. And then if the call from the utility is not answered for concerns they have of talking to the utility, then maybe that list goes to the agencies, and you make those calls, or we figure out some other way to do that where hopefully the phone will get answered and the customer will get the information. I think this is a good opportunity, a good discussion.

Charlee Thompson

I'm curious whether we consider rerunning this model after the first year of the CARES program, or whatever amount of time after the CARES program has been implemented, because as we know, CARES will increase Cascade's data on low income customers and its service area, and this model is based on or partially based on existing low-income customer data, which could be made more accurate after CARES captures more folks. Not saying we should rerun it in a year, but I see the value in it so I was curious if

that hadn't come up or come across your [guysguy's](#) thoughts as well how this model can be bettered with CARES.

Tillis, Daniel

Good question. Mark has done a lot of work here and one of the great things he's done is built the model that allows Cascade to update it periodically and he's given us the instructions on how to do that, so we definitely want to do that to periodically. We will want to discuss when the right time and years is after CARES is in place.

Charlee Thompson

Awesome, thank you.

Tillis, Daniel

Any questions on anything, I will share this presentation with you. Once we decide how we're going to use it as a group, when I say we, it's the collective group here.

Yochi Zakai

Thanks again for the presentation, this learning more about and seeing this model has been a long time coming since we first had conversations about it over the heating season. I think in the fall about the potential for using it to automatically qualify customers for arrearage forgiveness. That was a discussion that we had earlier, we're much farther along in developing the CARES program now and are pretty close to implementation but I do think it might be worth considering that use case that was brought up in the fall again as well to identify areas in which to target additional community based organizations for partnerships. And then the last one would be to identify customers to automatically enroll in other low-income programs and one area where the [Eenergy Pproject](#) has been thinking it would be good to start doing that would be when the Climate Commitment Act costs start being passed back to customers, low-income customers aren't supposed to be included in that and are going to get the credits and so perhaps customers who are identified by the propensity model as low-income could get those low income CCA credits. [aA](#) lot of ideas. I know we have more items on the agenda, so we don't have to talk about all of that now, but I wanted to add those to the areas to explore for potential use of this data.

Tillis, Daniel

I think the CBO ideas, one that I mentioned [earlie, rearlier](#) we definitely want to continue to evolve that program and utilize this data to help us do that. The CCA part is a really big discussion that we definitely don't want to get into today, but it's an interesting idea that we'll add to the list. As far as proactively providing some arrearage relief that we discussed using the model for when we started these discussions on creating a model, that's actually one of the ways we're trying to evaluate the data that we have available and it's actually about one of the last changes we asked our IT team to make yesterday to the data they've added to the detailed file, is to help us identify those customers a little more effectively, especially those who are in the severance process, which means they're in the last couple of steps of potentially being disconnected. As a company, we're definitely open to looking at that. [fF](#)or the reasons I'm going to share in the next a topic we recommend waiting until we have CARES in place to do that, because we're actually forecasting that we're going to run out of [we-WEAF](#) funds at the end of July.

2. Current Program Year WEAF Fund Balance

As you all know, one of the changes we made earlier this year in our filing to modify that WEAF program, [ais](#) we typically have an initial budget, then a soft cap and then a hard cap and we changed

that with the filing earlier this year to make the budget the highest amount possible and that's a little north of \$1.5 million, so that's the budget for 2023. Congratulations, you've all done such a great job ~~getting~~ distributing WEAF ~~re~~ funds to our customers that we are forecasting that for the first time ever that WEAF funds will actually be exhausted by the end of July. And you know, there are a lot of drivers of that ~~and most~~ and most of those go back to those changes we made earlier this year, but you all have also signed up approximately 7% more customers this year than last year and distributed more funds than any year ~~we~~ we've had. Partially because we increased the max of \$625, also because we implemented the minimum pledge of \$125 and we also utilized \$73,000 of the WEAF funds to fund the CBO program for the five agencies who opted in so Misty and Jen to answer your questions or I think it was Morgan actually who asked this question, we are asking the last day for you to approve an application to be July 28th which is next Friday. So, to approve an application for WEAF and then we'll honor all pledges approved through that date and then we'll resume Cascade ~~R~~atepayer funded programs on October 1st with the CARES program. I think that's also a good time to look at if we have an arrearage relief component with CARES to also look at the data for those customers who have a past due balance to see if we wanted to do anything proactive on the arrearage relief side and we know we're going to opt in anybody who's received assistance in the last year for the bill discount rate, but do we also want to do anything proactive as Yochi was talking about for arrearage relief? Keep in mind that ~~w~~Winter ~~h~~Help is still available for crisis assistance, we have about \$40,000 in that fund available to Washington customers and a fair amount of money, but it's not a ton so we want to be careful not to exhaust it as well.

Misty Velasquez Community Action of Skagit ~~(Guest)~~

Can I just ask one more quick question on the Winter Help that's supposed to be for any ~~w~~Winter ~~h~~Help, that is considered an emergency, right?

Tillis, Daniel
Correct.

Misty Velasquez Community Action of Skagit ~~(Guest)~~

So they need to be in a disconnect status to use that fund.

Tillis, Daniel

I would recommend we continue to use it that way for emergency crisis funds.

Yochi Zakai

Thanks for bringing this to the advisory group's attention. Since Cascade already has a tariff filing before the Commission that's proposing to revise the WEAF tariff to include an end date for when new folks can sign up, I'm wondering if we could consider also using that tariff filing to increase the budget so that we have more funding available to disperse to customers rather than not serving customers with energy assistance for two months of the year.

Tillis, Daniel

Yes, we can. It's something we've talked about, and we can do and actually, Chris and Jennifer have an update from a regulatory filing standpoint to share for the CARES filing. That actually impacts the WEAF component, so I'll turn it over to either Chris or Jennifer to share that and then share how it will work if we ask to increase the WEAF funds to bridge the gap the next two months before CARES starts.

3. Company / new program design update

a. CARES program filing – Chris Mickelson

a-

Mickelson, Christopher

That would have worked until a recent proposal by staff and the interpretation of a notification, especially for WEAF and how they think we are restricting access, even though CARES is basically a much more beneficial program that is in lieu of WEAF, and it applies to the exact same customers. Staff has asked, basically so we can meet certain notifications, that the WEAF piece and the funding piece will get extended until September but the overall program, which is Rule 20, and I can't remember the other schedule number will be on the normal open meeting agenda for July, so next Thursday. If we were able to keep all of that combined, we were thinking about doing a supplement for tomorrow and changing the CAP amount up to say \$1.7-1.8M just to make sure there was enough funds to cover the next two months with this extension, we'll work with staff but there's also very limited time. We could always try to do an LSN, do a separate filing, but now it starts getting really messy.

Yochi Zakai

I know that there are lots of different procedural options out there and lots of different thoughts on what the best procedural methods are for approving the new program, I'm happy to have conversations about that, but it really seems like if we can figure out a way that we could get a filing in that would make the program available it would be really nice to do that as soon as practical so that we could raise the budget. I don't think there would be any opposition from the advisory group for making a tariff revision either associated with other revisions or independently that would raise the budget so that energy assistance could be available for some or all of the next two months.

Mickelson, Christopher

Agreed and we have staff on the line so Corey Cook or Andrew Sellers, maybe you guys could weigh in, that'd be helpful.

Sellards, Andrew (UTC)

If I'm understanding it correctly, the issue with this filing is that there's a cost increase to the customers; that component triggers a 30 day notice requirement to customers, so then that means the notification to customers wouldn't get the full 30 days, so that was the other basis for the extension for the cost components of the filing.

Mickelson, Christopher

This is specifically for the WEAF component and how it is restricting access to customers and the notification for that.

Sellards, Andrew (UTC)

That's overstated the restriction of WEA~~FR~~ or the ending of the WEAF program is considered restriction service, so that triggers another the same ~~30-day~~30-day time frame similar to a rate increase.

Tillis, Daniel

I think I understood this a little differently than or maybe I misunderstood what you just said a few minutes ago, but the way I understood some of our conversations yesterday was that we're splitting ending WEAF out in its own separate filing now, right?

-

Mickelson, Christopher

So staff was looking into just having to extend the effective date and what they could do procedurally

internally to handle that whether that gets put into another docket, I'm not sure we still haven't heard back.

Hawkins-Jones, Jacque (UTC)

We have reached out to our administrative law division and we're waiting to get some information back. As far as if this needs to be a separate filing, since we have pulled out some of the tariff sheets based off our discussion yesterday, I believe that's how it's going to go where the company will need to provide a revised cover sheet to kind of show which schedules are being pulled out of the filing, which ones will be proceeding on to the July 27th open meeting with the August 1st effective date and then a separate filing under a new docket number. And, we'll have a September 4th, I believe effective date. Once we get our procedural approval, will let you know as soon as possible, but that's how it's looking right now.

Yochi Zakai

Would staff be supportive if the company was able to put in a filing with less than statutory notice to raise the budget of the current program so that we could continue accepting applications and providing assistance for the next two months? Perhaps even completely separately from the company that just looks at the at the budget for the existing WEA program over the next two months.

Hawkins-Jones, Jacque (UTC)

Staff would be open to supporting that.

Sellards, Andrew (UTC)

I would agree with that as well, yes.

Cook, Corey (UTC)

Agreed yes.

Yochi Zakai

Would the company be willing to make such a filing?

Mickelson, Christopher

Yeah.

Gross, Jennifer

I guess I'm confused. If we were to do that, wouldn't that keep us from having the ~~30-day~~30-day notice requirement?

Mickelson, Christopher

We would have to ask for that within it.

Gross, Jennifer

OK.

Mickelson, Christopher

And we would ask for a 28th effective date, the day after the open meeting so there ~~is~~are continuous funds.

Yochi Zakai

That'd be great. The ~~E~~energy ~~P~~project would be happy to show up at the meeting while I'm on vacation and support it.

Mickelson, Christopher

Look forward to that, we may need that help.

Tillis, Daniel

I think the budget was ~~\$~~1.53 million, I think we've talked internally about if we go this way, we'll probably ask for somewhere around ~~\$~~1.8 million just to you know, have plenty and not have the situation where we run out in late September or something and have any problems with that, that should easily clear what we would need with some comfort built in there, Chris and Jennifer will work on that.

Yochi Zakai

Great. And just so that we're clear for the agencies who aren't used to all this regulatory speak, we have basically come to an agreement where there will be funding available for the WEA program for the remainder of the year, so thank you very much for Cascade and staff for working with us on this.

Tillis, Daniel

And I would just say, we'll give the official update after the filing and the meeting with the ~~Commission,~~ ~~but~~Commission, ~~but~~ we'll definitely let you know that it's officially approved, and you can continue after July 28. Chris, you provided the update on the change in the filing, was there anything else you wanted to add there?

Mickelson, Christopher

No, that's it.

4. Recap unresolved items from last meeting – *Dan Tillis*

- a. Exception process to the \$1000 cap
- b. Communications plan

Tillis, Daniel

The last couple items on the agenda are a pretty fast anyway, so I think we have time to cover those. The last time we met with this full group and gave you an update on the CARES program we talked about the fact that the small group was having a discussion on the \$1000 cap for the Arrearage ~~R~~relief program, as well as the provision where customer can only receive that average relief once per 24 month period and we have agreed ~~but that~~ there will be an exception process for those two limitations and so under certain circumstances, customers will be considered for an exception to go over \$1000 in a 24 month period, as well as possibly receive more than one arrearage relief pledge, during a 24 month period. So, the company has that on our implementation plan list to define exactly what that process looks like in partnership with the small group. We're still meeting weekly, and so we'll keep the larger group updated on that. And then as far as the Joint Communications plan, again the small group is working on that, that was the core focus of our meeting last week in our small group meeting and we have a document that Charlee Thompson took the lead on to create for us. The stakeholder group collaborated to edit it and send it off to Cascade, and we just sent it back late in the day yesterday with our edits, questions, and comments so we'll continue that collaboration until we have a joint communications document that will share with this group to provide feedback on as well over the next

month or so. And then the last thing I'll share is part of that, as I mentioned, the implementation plan and while we don't have official approval for the CARES program yet, our stakeholder group is all on board with the program we've designed so we feel confident we'll get that hopefully next Thursday on the Commission open meeting, as a company we put together a detailed implementation plan, everything we need to make happen between now and then and we're working on that. A lot of that will include the processes that you'll all be following, and eventually in September that will include training for you on all of those processes and changes and the details of the programs and Misty, I'll circle back to a question or request you had last week in the small group meeting. If we do get on the Commission meeting next week and we stay on the timeline of an August 1st approval date for the program, we will work to get you a postcard and a brochure type material as soon as possible for CARES sometime, hopefully in the early part of August, but we'll definitely get you that as soon as we can. I think that's all of the company updates and recap on a couple of things that we've talked about in the past or update on a couple of things we've talked about. What questions do you have on anything we've talked about or feedback or comments or any other topics as we have 5 minutes or so left here? OK, I'm not seeing any hands up or items in the chat, so I think we can go ahead and wrap up about 5 minutes early. Thanks everyone for the engagement today and the questions and the feedback and we'll send out the meeting minutes and we'll attach the presentation to it as well. Have a great rest of your day.

5. Dedicated discussion of an agreed upon topic - *TBD by 7/12 Small Group meeting*

Cascade Washington: Low Income Program Participation Propensity Analysis

Cascade Natural Gas
Energy Assistance Advisory Group: July 19, 2023

Mark E. Thompson



Forefront
Economics Inc



Review Meeting Agenda

- Introductions
- Project Overview
 - Objectives & Approach
 - Results
 - Deliverables and Uses
- Wrap-up and Next Steps Discussion



Summary of Project Objectives and Approach

- Project Objectives
 - Develop premise level residential database for better understanding characteristics of low-income program participants
 - Use the enhanced residential database to identify residential prospects for low-income programs
 - Use results to target best prospects as a means of cost effectively driving low-income program participation rates higher
- Approach
 - Combine Cascade Natural Gas (Cascade) customer information with secondary data
 - Profile and contrast low-income participants with other residential customers
 - Model low-income program participation as a function of customer attributes
 - Apply model to “score” customers for program targeting



Developing the Data

- Combine Cascade CIS Data with Secondary Data
- CIS Data
 - Billing (usage, dollars)
 - L-I program participation
 - Payment data
 - Late payments
 - Arrearage balances
- Secondary Data – Household Level
 - Household income
 - Premise size, age and market value
- Secondary Data – Census Tract
 - Energy burden data
 - Concentration (percentage) of low-income households in Census Tract

CIS Data

- Energy Use
- Low-Income Program Participation
- Late Payment and Arrearage History

Secondary Data

- Premise Level
 - HH Income
 - Size of Home
 - Age of Home
- Census Tract
 - Energy Burden



Types of Cascade Data

- Premise Records
 - Service address and related location information
 - Serves as the basic unit of analysis
- Energy Bill Assistance Program History
 - The basis of dependent variable in propensity models
- Billing Records
 - Annual therms and dollars billed
- Payment history
 - Number of late payments
 - Arrearage balance
 - Non-payment related disconnects



Energy Bill Assistance Program Data (Cascade)

- Energy bill assistance program participation history obtained for the past five years.
- Participant counts jumped over the last two years from special pandemic relief assistance (Big Heart).
- This history is the basis for establishing dependent variable in low-income program participation propensity models.

--- Washington ---					
Program Name	2018	2019	2020	2021	2022
LIHEAP Washington	1,375	1,355	1,229	1,549	1,564
WA Big Heart Grant	0	0	0	6,690	3,697
WA Energy Assistance Fund (WEAF)	2,206	2,146	2,639	2,326	2,186
Winter Help	478	371	878	419	397
Total	4,059	3,872	4,746	10,984	7,844



- **Geocode Cascade and Secondary Addresses**
 - Standardizes addresses for improved match rates
 - Appends Census Tract numbers (2010 and 2020)
 - Appends latitude & longitude for GIS applications
- **Match Cascade Records to Secondary Household Data**
 - Run data enhancement routines, data cleaning, and reduction:
 - Calculate therms per square foot
 - Combine common fields (e.g. address fields)
- **Match Cascade Records to US DOE Energy Burden Estimates**
 - Source: Low-Income Energy Assistance Data (LEAD)
 - Census Tract level data
- **Result**
 - An information rich and site-specific data set for residential customers



Geocode and Match Results

- High percentage of records geocoded in both datasets
 - Indicates street addresses

--- Washington ---			
	Records	Geocoded	Percent Geocoded
CNG Premises	213,407	200,555	94%
Household Data (Secondary)	371,783	364,165	98%

- Nearly 104,000 premises (53% of geocoded premises) matched to household data
- Household data restricted due to business rules designed to prevent mismatch between occupant and attribute data
 - Example: If site record shows occupant moved and record has not been updated for a new occupant, the record was omitted.
- Plenty of matched premises for statistical modeling



Comparing Attributes

- Combined data allow for comparison of premises receiving energy bill assistance (EBA) with those that did not

- Have lower gas bills
- Higher Cascade account turnover
- More late payments and much higher arrearage balances
- Lower household incomes
- Live in smaller, older, less valuable homes
- Use significantly more gas per square foot.

--- Washington ---	EBA Participant	
	No	Yes
Cascade Data	N=183,120	N=10,903
Annual bill (2022)	\$871	\$817
Annual therm usage (2022)	619	576
Account turnover at premise	9%	16%
Avg monthly arrearage balance (2018-2022)	\$6	\$55
Avg annual late payments (2018-2022)	0.5	1.9
Secondary Household Data	N=115,232	N=4,161
Household income	\$112,068	\$77,695
Age of home (years)	42.21	55.19
Market value of home	\$404,062	\$284,783
Size of home (square feet)	2,455.62	1,962.61
Therms/Sq ft (CNG & household data)	0.289	0.354
Low-income Energy Assistance Data (LEAD)	N=201,405	N=11,952
Mean household income	\$89,617	\$80,030
Pct of gas heated homes < 150% FPL	12%	16%
Energy burden - Total	1.8%	2.1%
Energy burden - Natural Gas	0.7%	0.8%
Energy burden - Electric	1.1%	1.3%



Propensity Models

- Statistical models used to explain and predict the probability of a given event or outcome
 - Models relate the “outcome” (e.g. participation in low-income programs) to explanatory variables (“drivers”)
- Propensity models used extensively in:
 - Medical Research
 - What is the probability that a patient will develop lung cancer?
 - Driver variables: years smoking, years since last cigarette, sex, age, income
 - Social Research
 - What is the probability a student will graduate from college?
 - Driver variables: income, parents education, parents occupation, SAT/ACT scores
 - Economic Research
 - What is the probability a consumer will purchase a product or service?
 - Driver variables: price, price of competing and complimentary products, income



Propensity Models (cont'd)

- Results of logistic regression models are evaluated using many criteria
 - Experience table: number of “true” positives vs. false positives/negatives
 - “Lift” (preferred for model selection)
 - Actual experience using model (experience is the best teacher)
- Model results used to “score” other data beyond the sample used to estimate the model
 - Score: the estimated probability of event (e.g., low-income program participation) for a single observation (e.g., Cascade premise)
 - Sorting by estimated probability shows relative probability
 - Decile assignments based on sort ordered
 - More meaningful than absolute probability
 - A model with a poor experience table may still provide useful relative probability estimates



Sample of Premises for Propensity Modeling

- Select random sample of 5,000 premises that have been occupied by a low-income bill assistance program participant within the last 5 years (2018-2022)
- Select random sample 5,000 premises that have not been occupied by a low-income bill assistance program participant within the last 5 years (2018-2022)

--- Washington ---	
Program Participation Status	Premises
Billing Assistance Program Participants	5,000
Non-Participants	5,000
Total Number of Premises in Sample	10,000



Model Estimation

$$prob = (b_1 \cdot X_1) + (b_2 \cdot X_2) + \dots$$



Propensity Model Results

- Models using all Cascade variables, Census variables and variables from purchased household data
- Models using only variables from Cascade and Census

- Statistically significant and correctly signed
- Overall model performance deteriorates significantly if variable is removed

- Area under ROC varies from 0.5 to 1.0
 - No set rules but values between 0.8 and 0.9 are generally considered excellent
- ROC curves show
 - both models have excellent prediction accuracy
 - neither model stands out from the other as a better predictor.

--- Washington ---		
Model	Premises	ROC
Best All Variables Model	4,558	0.863
Best CNG and Census Variables Model	9,136	0.854



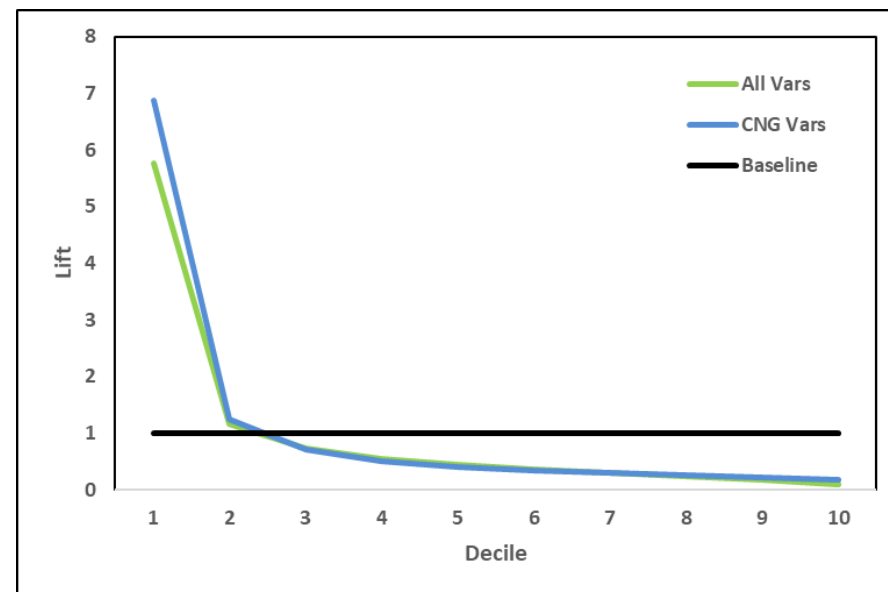
Variables in Final Models

--- Washington ---						
Variable	Best Model - All Data Sources			Best Model - CNG and Census Only		
	Impact on Probability	Statistical Significance	Influence	Impact on Probability	Statistical Significance	Influence
Household Income	-	High	High			
Market Value of Home	-	High	High			
Age of Home	+	Moderate	High			
Therms per Square Foot	+	High	Moderate			
Average Monthly Arrearage	+	High	High	+	High	High
Late Payments	+	High	High	+	High	High
Late Payments - Moratorium	+	High	High	+	High	High
Account turnover	+	High	High	+	High	High
Energy Burden - Total	+	Moderate	Weak	+	High	Weak
Percent homes < 150 % FPL	+	High	Weak	+	High	Weak
Annual CNG Bill - Dollars				-	High	High
Premise Type - Multifamily				+	High	High
Premise Type - Manuf. Home				+	High	Moderate
Non-Payment Disconnect				+	Weak	High



Model Results - Lift

- Lift – how well a model identifies high likelihood prospects relative to average participation rate
 - Allows comparison of models ability to identify likely program prospects
- Lift shows the ratio of model predicted probability to average probability
 - Higher lift means better low-income program prospects
 - Lift of 1.0 means model no better than average of current participation
- Results in chart sorted from most likely to participate in low income programs (decile 1) to least likely (decile 10)
- In terms of ability to predict program participation, the best models from each category are not meaningfully different.
- Both provide excellent in first decile (10% of the premises predicted by model).
- Model using only Cascade and Census variables (CNG Vars)
 - Has better coverage (almost all Cascade premises can be predicted with model)
 - Does a slightly better job of identifying premises with the highest probability of program participation (Decile 1)





Customer Profiles by Decile

- Shows how decile groups compare across variables in the analysis
 - Use to contrast top prospects for program participation (decile 1 and decile 2) to other customers.
 - Top three deciles shown separately and remaining deciles grouped to better illustrate differences in analysis variables between groups of customers.

--- Washington ---					
Variable	Variable Means by Decile				
	1	2	3	4-5-6	7-8-9-10
Household Income	\$81,193	\$83,378	\$88,886	\$102,519	\$131,410
Market Value of Home	\$277,662	\$300,460	\$324,157	\$383,848	\$465,737
Age of Home	58	56	54	42	35
Home Square Footage	1,981	2,019	2,100	2,289	2,765
Therms per Square Foot	0.331	0.314	0.304	0.281	0.284
Energy Burden - Total	2.2%	2.2%	2.1%	1.8%	1.6%
Percent homes < 150 % FPL	18.3%	17.5%	15.2%	12.5%	8.6%
Average Monthly Arrearage	\$64	\$11	\$5	\$2	\$0
Late Payments	2.7	1.3	0.7	0.3	0.1
Late Payments - Moratorium	46	10	5	2	1
Account turnover	24%	23%	18%	11%	3%
Non-Payment Disconnect	16%	4%	1%	0%	0%
Annual CNG Bill - Dollars	\$780	\$752	\$772	\$800	\$993

Scoring All Customer Premises



- Scoring refers to using model to predict low-income program participation probability for Cascade customers
- Final model based on Cascade and Census variables used to “score” all premises



Interpreting Results

- Uses (relative probability)
 - Identifies premises with high probability of program participation relative to other premises
 - Identifies Census Tracts with high number of premises with high probability of program participation relative to other premises
- Limitations (absolute probability)
 - Can not use probability estimates as absolute estimates. Examples of absolute probability uses include:
 - Which premises will participate in low-income programs next year
 - How many premises will participate in low-income programs next year



Application of Results

- Drive program participation higher through targeted outreach
 - Example: Contact top 20%-25% of prospects
 - Example: Neighborhood events (top 20 Census Tracts shown in table)

- Other Possible Uses
 - Targeting of other customer service (e.g. DSM programs and services)

Service County	Census Tract (2020)	Number of Decile 1 and 2 Premises
Yakima	000700	917
Yakima	001202	771
Mason	960900	647
Kitsap	080200	643
Yakima	002003	500
Whatcom	000700	496
Whatcom	001000	490
Franklin	020504	458
Whatcom	010411	427
Yakima	000500	423
Kitsap	080600	402
Yakima	000600	401
Franklin	020605	400
Walla Walla	920600	391
Franklin	020606	382
Skagit	952401	377
Yakima	940006	375
Whatcom	001203	374
Adams	950500	370
Skagit	952500	355



Wrap-Up and Discussion of Next Steps



Deliverables

- Document Files
 - PowerPoint documenting approach and findings
 - Technical notes
 - Variable list, labels and coded values
- Programs and Tables
 - Excel workbooks with premise data and propensity model scores
 - Excel workbook with separate sheets for decile 1 and decile 2 prospects: “****_Final_Decile_1and2.xlsx”
 - Excel workbook with consolidated county and Cascade residential data: “****_Final_All.xlsx”
 - Score Code
 - Provides for easy updating of scores as underlying data changes
 - Consult with us before using to avoid misapplication