

PacifiCorp

Low Income Bill Assistance Program

Program Year 2023

As part of a request in the Settlement Stipulation in docket UE-191024 dated July 17, 2020, PacifiCorp dba Pacific Power & Light Company (PacifiCorp) agreed to provide an annual report on its Low Income Bill Assistance (LIBA) Program. The settlement provided for the first report to be submitted by January 1, 2022, with subsequent reports filed 120 days after the end of each LIBA program year. Additionally, PacifiCorp agreed to continue to provide current monthly State of Washington Low-Income Data Tracking report and to include information on disconnections, credit, and collection data, in the LIBA program annual report.

LOW INCOME BILL ASSISTANCE (LIBA) PROGRAM:

Background:

The LIBA Program has been available through Schedule 17 since November 2003. The Program Year runs from October 1 through September 30, aligning with the federal Low Income Home Energy Assistance Program (LIHEAP) program year. LIBA provides three discount tiers. The credit amount is based on the income qualification level for which a customer is certified. Previously, LIBA was designed to provide credits to income-eligible households for monthly usage over 600 kWh and included an annual enrollment cap. PacifiCorp proposed revisions to LIBA through Advice Letter No. 21-04 on July 2, 2021, which changed the discount program from a per kWh credit for usage in excess of 600 kWh to a percentage discount on customer's monthly net bill. PacifiCorp also proposed to remove the annual enrollment cap and expand Tier 3 income guidelines in compliance with RCW 19.405.020 (25) which defines Low Income as "household incomes as defined by the department or commission, provided that the definition may not exceed the higher of eighty percent of area median household income or two hundred percent of the federal poverty level, adjusted for household size"¹. The Washington Utilities and Transportation Commission (WUTC) approved the proposed tariff revisions effective August 1, 2021.

Budget:

The LIBA program is funded through Tariff Schedule 91 Surcharge to Fund Low Income Bill Assistance Program, which is applicable to all customers, except those participating in Schedule 17 and Schedule 18. The total cost recovery for program year 2023 was \$5,216,044.72. As of September 30, 2023, the account had an under-collection balance of \$2,578,359.21. The total amount of discount provided to enrolled customers was \$5,175,121.14 for program year 2023, and the total program administration cost was \$562,745.45.

¹ <https://app.leg.wa.gov/RCW/default.aspx?cite=19.405.020>

Administration:

PacifiCorp partners with three local Community Action Agencies to administer and deliver the program. The agencies include Blue Mountain Action Council (BMAC), which serves Columbia, Garfield, and Walla Walla counties; Opportunities Industrialization Center of Washington (OIC) serving Upper Yakima County; and Yakima Valley Farm Workers Clinic Db a Northwest Community Action Center (NCAC) serving Lower Yakima County. The agencies respond to inquiries from PacifiCorp customers regarding the program, its purpose, the benefits, and application process.

Additionally, agencies provide intake services, certify customer income eligibility, and assign them to one of the three income tiers. The Agencies currently receive a \$75.00 administration fee for each certified customer. Program administration reimbursement provided in program year 2023 was \$516,150, about 9.90 percent of the direct grant or discount amount.

PacifiCorp’s internal administration cost for program management was \$4,436.85, approximately .09 percent of the direct grant or discount.

Enrollment:

As of September 30, 2023, there were 8,132 customers enrolled in the LIBA program. Breakdown of enrollment and percentage by discount tier are detailed in Table 1 below. Most customers are enrolled in Tier 3, which include customers that would have not qualified for LIBA prior to the expansion of income guidelines. As a result, the program now better serves low-income households and can further reduce household energy burden. Tier 1, which includes customers in the lowest income qualification level, is the second largest enrollment tier.

Table 1: LIBA Enrollments by Tiers (October 1, 2022 – September 30, 2023)

TIERS	CREDIT LEVEL	INCOME GUIDELINES	COUNTS	%
1	70%	0-75% of Federal Poverty Level (FPL)	2,755	33.88%
2	35%	76-100% of Federal Poverty Level (FPL)	2,160	26.56%
3	15%	101-200% of Federal Poverty Level (FPL) or 80% Area Median Income (AMI), whichever is greater	3,217	39.56%
TOTAL			8,132	100.00%

*Low Income Energy Credit is the percentage of a customer’s net bill

Outreach and Communications:

PacifiCorp runs LIBA outreach and communications primarily in the Spring and Fall annually; times leading into periods of high bills and around the start of LIHEAP season in early Fall. The marketing strategies utilized include website, social media, bill insert/onserts, bill messages, radio ads, video ads, theater ads, newspaper ads, church ads, community outreach and distribution of program flyers and materials to partner administering agencies and local organizations who share information within their networks. Outreach communications and materials are in English and Spanish and intended to increase program awareness. The flyers include local partner agencies contact information and encourage customers to apply. The actual expenditure for marketing and outreach in program year 2023 was \$42,158.60.

DISCONNECTION DATA REPORTING:

Disconnection data reporting provided in Table 2 below. The reporting period aligns with Low Income Bill Assistance (LIBA) program year from October 1 through September 30 and includes residential services.

Table 2: Disconnection Data Reporting (October 1, 2022 – September 30, 2023)

1	Total disconnections for all purposes ¹	798
2	Total disconnections of residential customers for non-payment	395
3	Total disconnections of LIBA and LIHEAP participants for non-payment	85
4	Total remote disconnection, if any, for non-payment ²	0
5	Total remote disconnection of LIBA and LIHEAP customers for non-payment if any ²	0
6	Total disconnections of customers with a medical emergency verified at the premises within the previous two years	0
7	Number of payments, amount received, and mode of payment (cash, check, electronic, etc.) received during a field/premise visit to the service address, made by the customer to prevent disconnection	0
8	Number of free and fee-paid pay stations ³	145
9	Number and nature of customer complaints related to disconnection ⁴	1
10	Number of deferred payment plans and the amount deferred.	
	10a.	14,041
	10b.	\$13,061,246
11	Arrearage amounts	\$12,760,967

1. Disconnections include voluntary and involuntary disconnects.

2. There are no residential Advanced Metering Infrastructure (AMI) meters and, therefore, no remote discounts.

3. The State of Washington pay stations are fee free.

4. Commission Complaint – “Pacific Power plans to disconnect the customer’s electric service on June 26, 2023, due to the \$10,000 past due balance owed on their account.”

Low Income Advisory Group

Low Income Advisory Group (LIAG) include stakeholders representing WUTC Staff, The Energy Project, Public Counsel, NW Energy Coalition, Pacific Power and the three local Community Action Agencies that administer LIBA. LIAG meetings were held virtually on April 21, 2023, and August 01, 2023. Pacific Power provided updates on program budgets, enrollments, and marketing & outreach strategies. Stakeholders discussed topics outlined below, which include proposed changes to improve service to customers.

- Income Self-Declaration – Stakeholders approved recommendation to use income self-declaration form for LIBA program certification for those clients unable to provide income documentation. Self-declaration would allow LIBA enrollment for 1 year while providing an opportunity for agency to work with customer and prepare to collect documentation for recertification.
- Stakeholders approved recommendation to increase Marketing and Outreach budget to 60k from 50k annually. The budget currently includes internal administration and outreach, and the increase will help expand communication channels targeting hard to reach customers.
- Continue to explore potential additional local partners for LIBA program delivery and community organizations for program outreach.
- Publish a universal LIBA application and make accessible on Pacific Power website.