



Low-Income Rate Assistance Program (LIRAP)

Annual Summary Report

For the program period October 2012 through September 2013

WASHINGTON

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Overview

Avista Utilities' Low-Income Rate Assistance Program (LIRAP) approved by the Washington Utilities and Transportation Commission (UTC) in 2001 collects funding through electric and natural gas tariff surcharges on Schedules 91 and 191. These funds are distributed by Community Action Agencies (CAA's) in a manner similar to the Federal and State-sponsored Low Income Home Energy Assistance Program (LIHEAP)¹. LIRAP, like LIHEAP assistance can help a household avoid having its utilities shut off or help reestablish service after a disruption and can also help pay ongoing heating costs, assisting families who may have a hard time paying utility bills and meeting other basic household expenses such as food, prescriptions, rent, or child care.

Avista is committed to reducing the burden of energy costs for our customers most affected by rising energy prices, including low income individuals and families, seniors, disabled and vulnerable customers. To assist our customers' in their ability to pay, the Company focuses on actions and programs in four primary areas:

- 1) advocacy for and support of programs providing direct financial assistance;
- 2) low income and senior outreach programs;
- 3) energy efficiency and energy conservation education; and

¹ The Low Income Home Energy Assistance Program (LIHEAP) is a federal program established in 1981 and funded annually by Congress. These federal dollars are released directly to states, territories, tribes and the District of Columbia who use the funds to provide energy assistance to low-income households. LIHEAP offers financial assistance to qualifying low-income households to help them pay their home heating or cooling bills. Under federal law, a household must have income below either 150 percent of the federal poverty level or 60 percent of state median income level, whichever is higher. However, states can set lower income thresholds if they choose to. Some states use non-federal funds to expand their programs to include more households or to provide higher benefits.

4) support of community programs that increase customers' ability to pay basic costs of living.

We have a history of making it a priority within our Company to maintain and implement programs that are effective in assisting our customers that are experiencing difficulty paying their energy bills and seniors living on fixed incomes. Avista, along with the low income and senior/vulnerable advocates has long sought to understand the reach and effectiveness of energy assistance and energy efficiency programs. The challenge continues to be how to estimate with more certainty the level of need which could provide information for the purpose of assessing program size and design. Energy Burden will be discussed later in this report and what impact the federal LIHEAP and Avista LIRAP have had in Spokane County.

In the Company's last general rate case², the Parties agreed to increase LIRAP funding in 2013 and 2014; the funding level for the electric low income program increased by 3% and 3.68% for the natural gas low income program. On January 1, 2014 the funding level for the electric low income program will increase another 3%, and .94% for the natural gas low income program.

As part of the multi-party settlement stipulation, Avista has agreed to work with Commission Staff and all interested parties to discuss the merits of the existing LIRAP program and other potential design options, including a discounted rate program and to propose changes, if necessary, in its next general rate case.

The Company is cognizant that, while the funding from the LIRAP surcharge is distributed to qualifying customers through direct bill assistance (i.e., grants), there is

² Docket No. UE-120436 and UG-120437

interest in exploring other programs that may also help to reduce the energy burden such as a discounted rate, arrearage forgiveness plans, percentage of income payment plan, to name a few. PacifiCorp currently offers a discount rate in Washington, while Puget Sound Energy operates their low-income rate assistance program in a manner similar to that of Avista.

In May 2013, the Company sent out a “Request for Information” to all of the affected parties – the Commission Staff, Washington Investor Owned Utilities, Public Counsel, and the Energy Project. The responses to the request helped inform a meeting held on September 11, 2013 to discuss current programs and to address the issues of the administration of low-income programs.

The Company continues to review programs offered by other states, gather information, request discovery of agencies, as well as collect and analyze data to determine whether or not it merits a change to its current program. Such information will be important in identifying—and fostering the further use of—any methods of meeting the energy needs of low-income families that may be more effective than current methods. At this time, the Company believes it is a bit premature to propose a change to its current program and commits to setting up a schedule for 2014 to meet with parties to discuss results, ideas and possible proposals for future changes.

Program Year Results

Approximately \$3,782,603 of electric revenue was collected during the program year and \$1,699,151 natural gas revenue was collected for a total of \$5,481,754. For this program year, the average LIRAP heat grant averaged \$461. Over 12,680 electric and natural gas customers in the Company's Washington service territory received total energy grants averaging \$343.

In this program year, 65% of LIRAP participants had household average incomes less than \$15,000. Approximately 25% of the grant recipients had annual household incomes less than \$8,000. Over 67% of the LIRAP participants had households of two or more people. Customers renting their residences constituted 72% of the total.

The following Table reflects the total amount disbursed since the inception of the Washington LIRAP program, these numbers include amounts for Direct Services, Administration, and Conservation Education:

Table 1 – Yearly Revenues and Disbursements

Program Year October 1 - September 30	Beginning Balance	Total Revenue	Total Funds Disbursed	Ending Balance
2001-2002	\$0	\$2,731,616	\$2,476,529	\$255,087
2002-2003	\$255,087	\$2,678,068	\$2,197,150	\$736,005
2003-2004	\$736,005	\$3,158,220	\$2,533,916	\$1,360,309
2004-2005	\$1,360,309	\$3,039,672	\$3,169,051	\$1,230,930
2005-2006	\$1,230,930	\$3,157,635	\$3,230,665	\$1,157,900
2006-2007	\$1,157,900	\$3,846,394	\$4,155,463	\$848,831
2007-2008	\$848,831	\$3,302,091	\$3,320,239	\$830,683
2008-2009	\$830,683	\$4,078,532	\$2,955,033	\$1,954,182
2009-2010	\$1,954,182	\$4,220,837	\$5,534,638	\$636,267
2010-2011	\$636,267	\$4,701,900	\$3,638,166	\$1,700,001
May 2011- September 2011	\$1,700,001	\$1,607,661	\$668,243	\$2,639,419
2011 - 2012	\$2,639,419	\$5,078,131	\$5,698,838	\$2,018,713
2012 - 2013	\$2,018,713	\$5,481,754	\$6,030,999	\$1,469,468

Participants and Fund Distribution

Avista's LIRAP provided 12,680 grants in the current program year. The total grants averaged \$343 per customer. Participants may have received a total of two grants from LIHEAP, LIRAP and LIRAP Project Share at different times during the program year. The CAA's are able to serve repeat participants according to the LIHEAP/LIRAP guidelines, specifically using income qualifications and by demonstrated

need. The following table breaks out the number and amount of grants by program component:

Table 2 - Number and Amount of Grants by Component

Year 12 - October 2012 through September 2013			
Program Component	Number of Grants	Grant Amount	Avg. Grant Amt.
LIRAP Heat	6,258	\$2,888,030	\$461
LIRAP Emergency Share	5,155	\$1,123,625	\$218
Senior Outreach	1,267	\$333,335	\$263
Total	12,680	\$4,344,990	\$343

Year 11 - October 2011 through September 2012			
Program Component	Number of Grants	Grant Amount	Avg. Grant Amt.
LIRAP Heat	6,047	\$2,911,968	\$482
LIRAP Emergency Share	4,950	\$1,138,850	\$230
Senior Outreach	1,530	\$403,890	\$264
Total	12,527	\$4,454,708	\$356

Partial Year - May 2011 through September 2011			
Program Component	Number of Grants	Grant Amount	Avg. Grant Amt.
LIRAP Heat	72	\$27,660	\$384
LIRAP Emergency Share	358	\$85,157	\$238
Senior Outreach	315	\$84,041	\$267
Total	745	\$196,859	\$264

Table 3 below shows a collection of demographic data intended to be responsive to requests for general information of participating customers. This data was collected by the participating Community Action Agencies.

Table 3 -- Demographic Data

	# of Households	% of Households	Cumulative %
Home Ownership			
Own	3,585	28%	28%
Rent	9,095	72%	100%
Total	12,680		
Heating Fuel Source			
Electric	7,218	57%	57%
Natural Gas	5,406	43%	100%
Other	56	0%	100%
Total	12,680		
Size of Household			
1 Person	4,206	33%	33%
2 People	3,073	24%	57%
3 People	2,121	17%	74%
4+ People	3,280	26%	100%
Total	12,680		
Annual Income Level			
Under \$2,000	1,078	8%	8%
\$2,000-\$3,999	491	4%	12%
\$4,000-\$5,999	723	6%	18%
\$6,000-\$7,999	847	7%	25%
\$8,000-\$9,999	2,155	17%	42%
\$10,000-\$11,999	1,172	9%	51%
\$12,000-\$14,999	1,803	14%	65%
Over \$15,000	4,411	35%	100%
Total	12,680		

Program Impacts

Energy Burden - “Energy burden” is the percentage of income that households pay for energy service. This term is relevant to low-income issues as a comparison to income used for other essential needs such as food, housing, clothing, and health services. Table 4³ depicts reductions in the energy burden experienced by energy assistance participants in the current program year. The column titled “Before Benefits” represents the energy burden to low-income customers prior to receiving the energy assistance benefits. Each successive column illustrates low-income customers’ energy burden after receiving the specified energy assistance benefit. For customers receiving energy assistance benefits, the energy burden has been reduced by approximately 53% for customers between 0 and 50% of the federal poverty level (FPL); 48% for those between 51% to 100% FPL and by 39% for energy assistance recipients between 101% and 125% of the FPL.

Table 4 has been calculated as follows:

- The remaining households’ energy burden was calculated by dividing the annual household income by the annual energy costs.
- Annual income was calculated by multiplying the three-month average, required at the time of application, by four to determine the annual amount.
- Annual energy costs were determined by the actual previous 12 months energy usage from the date of application. When annual energy costs are

³ Information provided by the Spokane Neighborhood Action Program (SNAP).

not available, a backup amount developed on the average cost for households, with that fuel type and vendor, was used.

Table 4 - Energy Burden -- Total Energy costs divided by household income

ENERGY BURDEN 2012/2013								
		Energy costs are reduced by benefits for these calculations						
		Before Benefits	EAP or Avista	Plus Base and Fema	Plus PS	Plus Senior	Plus Avista Emer	All Benefits
0-50%FPL	N 1234 elec	25.9%	14%	14.0%	13.8%	14%	13.0%	12.8%
	824 gas	26.3%	13.0%	13.0%	12.8%	13.0%	11.6%	11.4%
	2058 all	26.1%	13.6%	13.6%	13.4%	13.6%	12.5%	12.3%
51-100%FPL	N 2990 elec	8.8%	5.1%	5.1	5.00%	5.1%	4.8%	4.8%
	2120 gas	8.3%	4.5%	4.5	4.50%	4.5%	4.2%	4.2%
	5110 all	8.6%	4.9%	4.9	4.8%	4.9%	4.6%	4.5%
101-125%FPL	N 829 elec	6.4%	4.3%	4.0	4.0%	4.0%	3.90%	3.8%
	792 gas	5.9%	3.7%	3.70	3.7%	3.7%	3.6%	3.5%
	1621 all	6.2%	4.0%	4.0	4.0%	4.0%	3.8%	3.8%

Program Distribution Percentage - Initially, the CAA's and the Company had mutually agreed that the percentages for program distribution among the three grant programs (i.e., LIRAP Heat, Emergency Share and Senior Outreach) would be: 80% for LIRAP Heat; 13% for LIRAP Emergency Share; and 7% for Senior Energy Outreach. In the 2010/2011 program year, in order to best leverage the additional LIHEAP funds, the CAA's and the Company agreed that the distribution should be changed to: 60% for LIRAP Heat; 26% for LIRAP Emergency Share; and 14% for Senior Energy Outreach. That distribution was maintained for the 2012/2013 program year. The results were as follows:

Table 5 – Distribution by Percentage

Agency	Heat	Emergency Share	Senior Outreach
Recommended Percent for Program Distribution	60%	26%	14%
Community Action Partnership Asotin	68.26%	29.42%	2.32%
OIC	78.33%	12.94%	8.73%
Rural Resources	71.00%	18.94%	10.06%
SNAP	66.67%	25.99%	7.34%
WGAP	85.05%	14.95%	0%
Community Action Center Whitman	4.53%	87.77%	7.70%
Total	65.82%	26.73%	7.45%

The Company recognizes that each agency service territory is unique and attributes the differences in program distribution to diversity of need that each agency experiences. However, the Company will continue to monitor and assess these

differences.

Avista Electric and Natural Gas Revenue - To improve the equitability of the distribution of LIRAP funds and based on discussions with Commission Staff and other interested parties, the Company agreed to allow electric revenue to be used for natural gas heat customers as long as those same customers also use Avista electric service. Of the total LIRAP funds distributed approximately 68% was electric and 32% was natural gas. The 2012/2013 results for heating source assistance is as follows:

Table 6 – Distribution of Revenue

Agency	Electric	Gas
A Community Action Partnership Asotin	53.18%	46.82%
OIC	89.71%	10.29%
Rural Resources	81.01%	18.99%
SNAP	52.40%	47.60%
Community Action Center Whitman	70.17%	29.83%
Total	57.53%	42.47%

Program Funding Distribution - The LIRAP program year was first established by the effective date of the Commission approved tariff on May 2, 2001. For the first nine years, the program year was May 1, through April 30. The LIHEAP program year is October 1st through September 30th and is considered the norm for the official heating season timeframe and for reporting data such as the number of households helped, amount of funding available for the year. The Company has aligned its LIRAP program year with the LIHEAP program year. With this change there is never a break in the distribution of awarding grants since it is essentially a “year-round” program.

Additionally, agencies are allocated a direct service funding amount and are paid administration/program deliver and conservation education staff and labor each month of the year, and those amounts are based on the previous month's revenues.

One of the benefits of having LIRAP funds at the beginning of the heating season enables the agencies to start providing heating assistance when the heating season begins and without confirmation of their LIHEAP funding.

Although the starting funds provide for an earlier heating season start date, it is important to note, and an area of concern for the Company, that Avista customers receive more LIRAP assistance than LIHEAP assistance. Since the programs intent has been to compliment, or extend the LIHEAP program, the chart below clearly shows that the number of LIRAP grants awarded to Avista customers, and the monetary amount associated with those awards, exceeds that of LIHEAP for the past couple of heating seasons:

Table 7 – LIHEAP and LIRAP Grant Distribution

Grant Type	2011/2012		2012/2013	
	# of Grants	Amount	# of Grants	Amount
LIHEAP	8,909	\$4,137,786	6,282	\$2,741,174
LIRAP	12,527	\$4,454,708	12,680	\$4,344,990

LIRAP Program Distribution Update

The WA LIRAP allocation, based on meter counts in each agencies service area, was updated with the 2013/2014 program year as follows:

Table 8 – New Allocation Distribution

	Distribution			
	Allocation Distribution		New Allocation Distribution based on meter count	
	Current Electric Distribution	Current Gas Distribution	Electric % New Allocation	Gas % New Allocation
Asotin	5.92%	5.78%	4.02%	4.24%
OIC	3.71%	0.99%	2.82%	0.71%
Rural Resource	13.15%	6.41%	13.62%	3.84%
SNAP	73.77%	83.26%	70.29%	85.15%
Whitman	3.46%	3.31%	9.24%	4.67%
WGAP	0.00%	0.25%	0.00%	1.40%

LIRAP Programs

LIRAP Heat: For clients receiving “regular” energy assistance (i.e., LIRAP Heat), the eligibility determination is the same as the Federal LIHEAP program. The amount of the assistance provided is based on household income, energy costs (all electric or natural gas costs, used for space heating or base load) and housing type (single family, multifamily, etc.) and then calculated using the Office of Community Development’s (OCD) mechanism. The benefits of using this mechanism include leveraging

established systems and staff knowledge already in place at the agencies as well as using a system that indexes assistance to income and need.

LIRAP Project Share (Emergency): For clients receiving “emergency” assistance (i.e., LIRAP Project Share) or small benefit amounts, the process is similar to that used for the donation-based Project Share program. The amount of emergency assistance is determined on a case-by-case basis not to exceed \$300. Emergency assistance qualification criteria include imminent danger of disconnection. All energy costs resulting from electric or natural gas usage is eligible (including kWh and therm consumption, applicable taxes, and arrearages).

LIRAP Senior Outreach: The Senior Energy Outreach program guidelines are designed to help mitigate the impact of energy costs on vulnerable seniors living in their own homes, yet who are over income guidelines for energy assistance. This program also includes conservation education workshops specifically designed for seniors.

CAA’s follow established protocols to qualify and distribute the assistance to eligible customers. These guidelines are promulgated by the Washington State Office of Community Development and cover: 1) eligibility, 2) documentation and verification, 3) energy assistance services, and 4) allowable costs. The participating CAA’s follow these guidelines for the disbursement of energy assistance funds originating from Schedules 91 and 191.

Program Process

Agency Meetings - The Company met twice this year with the LIRAP agencies – the first meeting was held before the heating season commenced and the second meeting was held right after the season ended. The discussion that occurs during the meetings provides direction for continued program refinement and clarity for program implementation. Additionally, it is an opportunity to train the agency representatives on topics that affect customers; for example for the meeting preceding the heating season, the Company Collection Manager and a CARES representative provided an overview of the billing process.⁴

In addition to the group meetings, the Company has discovered that meeting with each of the agencies at their location is extremely beneficial. During an agency site meeting, the agency staff, the Avista LIRAP Manager and CARES representative can discuss in detail how LIRAP functions at the agency, best serves their client population and any topics of special interest to the agency.

Conservation Education and Outreach

Conservation Education (Con-Ed) is a key component of the LIRAP energy assistance program as it supports the program's intent to encourage self sufficiency. Teaching and demonstrating proven approaches to managing energy use may potentially reduce customers' bills and increase customers' ability to pay. In the original

⁴ Avista Customer Assistance Referral and Evaluation Services (CARES) team is comprised of specially-trained representatives that provide referrals to area agencies and churches for customers with special needs for help with housing, utilities, medical assistance, etc. Currently, the CARES team is working with 2,336 special needs customers in Washington.

program dockets (Docket Nos. UE-010436 and UG-010437) the Commission Staff's decision memo dated April 25, 2001 states: "Staff believes that a comprehensive educational program should be designed to contribute toward changing the behavior of customers with respect to energy conservation and efficiency. The educational materials may include video, workshops, articles, brochures and newsletters, etc. The production of educational materials, including how well the message is structured, ease with which it can be comprehended by customers and whether or not there are alternative forms of educational materials to enhance conservation measures, should be evaluated by consultants." Also provided in Staff's memo is the inclusion of the 4% funding level to the Company for Conservation Education.

Based on this order, Avista has recognized the following educational strategies as efficient and effective means for delivering the energy conservation program:

- Energy Conservation workshops for groups of Avista customers with the primary focus on reaching seniors and low-income.
- Energy Conservation kits that include items such as: window plastic, V-seal, outlet draft stoppers, and other items to encourage effective energy management practices and that all Avista customers who have received an energy assistance grant be provided with energy conservation materials.
- Avista printed materials that feature information on:
 - Avista Assistance Programs, such as payment arrangements, comfort-level billing, preferred due date, and
 - Energy saving methods and resources

However, the results from the rate order⁵ effective January 1, 2012, provided for a reallocation of \$180,000 from Avista Conservation Education to direct services (e.g. the low-income energy bill assistance). For the 2011/2012 LIRAP year, to achieve compliance with the order, Avista suspended LIRAP-funded conservation education, effective January 1, 2012.

Conservation Education Activities

Home Energy Kits

It is the Company's goal that each Avista customer who applies for either a LIHEAP or LIRAP Heat grant receives both information and materials to help them manage their energy use effectively. This goal has been accomplished with the creation of an Energy Efficiency Kit that is mailed to these customers. Each kit contains energy saving items and information. For the 2012/2013 program year, the Company coordinated the distribution of 9,598 mailed conservation education kits that included an energy timer and printed materials such as tips sheet and calendar that featured no-cost/low-cost energy efficiency ideas to individuals who had received a grant at SNAP and OIC. The kits were funded out of SNAP and OIC's LIRAP conservation education allocations.

The other agencies chose to purchase energy saving items to disburse to individuals either at the time of their appointment or through other means. The Community Action Partnership that serves Asotin County allows for individuals to request items that they would like to use; the concept is that individuals will use what

⁵ Docket Nos. UE-110876 and UG-110877.

they request rather than a pre-packed kit that may contain things that they won't use. Rural Resources serving Stevens, Lincoln and Ferry counties distributed kits through local food banks. Individuals who had completed an application for energy assistance were provided with a voucher that could be redeemed at their local food bank for a home energy kit. Additionally, energy assistance recipients may receive education at the time of intake and in-depth counseling and personalized troubleshooting is provided to high energy bill customers

Outreach

The majority of households seeking assistance contact the Community Action Agencies (CAA's) directly. However, Avista has a variety of methods to support outreach efforts to engage those in need and guide them to the agencies and promote the availability of assistance programs at the agencies.

All Avista Customer Service Representatives (CSRs) are informed about the agencies that administer LIRAP so they can appropriately refer customers seeking assistance. In 2013, an agency update feature was added to the Company's low-income workbench; this feature enables the agency administrator to provide real time information regarding their agency appointment and funding status to the CSRs, therefore improving the quality of the customer referral to the agency.

Furthermore, at Avista-hosted community workshops, energy fairs and mobile outreach events, the Company staff informs participants about the local agency and the services they provide – most specifically energy assistance. In 2013, approximately 1,782 individuals were reached through these programs.

Senior Directories and Publications

The Company continues its practice of placing ads in senior publications as part of a strategic effort to reach seniors with information about energy efficiency, billing assistance, Senior Energy Outreach workshops and CARES information.

Reporting Protocols

The Company reviewed the program year report in the fall of 2012 with its Energy Efficiency Advisory Group. This Report is intended to be responsive to several areas identified for evaluation as part of the UTC's authorization of this program.

Key Terms

Key terms used in this Report are described as follows.

- Energy Cost Burden, Energy Burden—The percentage of income that households pay for energy service.
- LIRAP Heat—Benefit calculated using customer heating costs. LIRAP Project Share—Funds provided for “emergency” purposes. The term “Project_Share” is used because this LIRAP emergency funding is patterned after the Project Share Program.
- Participants—Customers who received LIRAP grant(s).
- Schedule 91—Avista tariff including the electric surcharge LIRAP rate.
- Schedule 191—Avista tariff including the natural gas surcharge LIRAP rate.

- Senior Energy Outreach—This program denotes an offering unique to low-income senior customers.

Data Collection

The data collection and measures used by Avista Utilities in the evaluation of LIRAP include:

- LIRAP Database;
- Customer Service System (Avista Utilities' information management data base);
and
- Ongoing Advisory Group review.

Participating LIRAP Agencies

- Spokane Neighborhood Action Programs
- Opportunities Industrialization Center of Washington
- Community Action Center of Whitman County
- A Community Action Partnership (Asotin County)
- Washington Gorge Action Programs
- Rural Resources Community Action

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