



Low-Income Rate Assistance Program (LIRAP)

Annual Summary Report

For the program period October 2013 through September 2014

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 92 and 192. 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 long 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 Commission, ordered that the LIRAP funding increase proposed in the Settlement be doubled, for a total electric LIRAP funding increase of \$400,000 and a total natural gas LIRAP funding increase of \$428,000 and encouraged parties to file mutually agreed upon additions to the LIRAP program at the same time as any mutually agreed-upon modifications without waiting until the following year as contemplated by the Settlement. If the parties cannot agree upon modifications or additions to the program by June 1, 2015, they should file alternative or competing proposals with the Commission at that time.

² Docket No. UE-140188 and UG-140189 (consolidated)

Program Year Results

Approximately \$3,852,491 of electric revenue was collected during the program year and \$1,839,651.86 natural gas revenue was collected for a total of \$5,692,143. For this program year, the average LIRAP heat grant averaged \$459. Over 12,483 electric and natural gas customers in the Company's Washington service territory received total energy grants averaging \$343.

In this program year, 63% of LIRAP participants had household average incomes less than \$15,000. Approximately 24% of the grant recipients had annual household incomes less than \$8,000. Over 64% 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
2013 - 2014	\$1,469,468	\$5,692,143	\$5,671,179	\$1,490,432

Participants and Fund Distribution

Avista’s LIRAP provided 12,483 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.

Table 2 - Number and Amount of Grants by Component

Year 13 - October 2013 through September 2014			
Program Component	Number of Grants	Grant Amount	Avg. Grant Amt.
LIRAP Heat	5,858	\$ 2,690,061	\$459
LIRAP Emergency Share	5,166	\$ 1,204,700	\$233
Senior Outreach	1,459	\$ 389,473	\$267
Total	12,483	\$ 4,284,234	\$343
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

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	3,545	28%	28%
Rent	8,938	72%	100%
Total	12,483		
Heating Fuel Source			
Electric	7,076	57%	57%
Natural Gas	5,294	42%	99%
Other	113	1%	100%
Total	12,483		
Size of Household			
1 Person	4,490	36%	36%
2 People	3,019	24%	60%
3 People	1,904	15%	75%
4+ People	3,069	25%	100%
Total	12,483		
Annual Income Level			
Under \$2,000	1,094	9%	9%
\$2,000-\$3,999	527	4%	13%
\$4,000-\$5,999	621	5%	18%
\$6,000-\$7,999	720	6%	24%
\$8,000-\$9,999	2,098	17%	41%
\$10,000-\$11,999	1,121	9%	50%
\$12,000-\$14,999	1,719	14%	63%
Over \$15,000	4,583	37%	100%
Total	12,483		

Administration and Program Support Fees

A portion of the revenue collected is provided to the six Community Action Agencies in Avista's Washington service territory for disbursement to qualifying customers and for administration of the program.

Customer eligibility for LIRAP Heat is determined according to existing guidelines established by Federal and State standards used for the Low-Income Home Energy Assistance Program (LIHEAP). Additionally, customers experiencing emergencies are eligible for assistance under LIRAP Project Share. And for senior customers who exceed the federal income guidelines, there is LIRAP Senior Outreach that is designed to be used in conjunction with Comfort Level Billing. The programs and partnerships Avista has formed have been invaluable to customers who often have limited incomes or have exhausted all of their resources.

For this reporting program year, a total of \$901,635 was distributed to the Agencies for administration and program support fees support, which was 16.5% of revenue collections and accrued interest. This amount, including the \$370,726 carry over from the previous reporting program year, totaled \$1,272,361 available for administration and program support costs.

Excluding the amount subsidized from other funding sources, the amount spent by the agencies from LIRAP funds was \$896,363, leaving an unspent administration and program support fees balance of \$375,998 at September 30, 2014. This funding has already been paid out to the individuals agencies and per their discretion can be carried forward into the next reporting program year to cover future administration costs

of the agencies. The table below represents a recap of the administration and program fees spent and the amount available at September 30, 2014.

Table 4 – Administration and Program Support Fees

Table 4 Washington LIRAP Admin and Program Support Fees Funds October 1, 2013 through September 30, 2014	
Admin and Program Fees Carry Over from Program Year 12	\$ 370,726
Program Year 13 - Admin & Program Support Funds paid to Agencies	<u>901,635</u>
Net Funds Available for Admin and Program Support Fees	1,272,361
Admin and Program Support Funds Spent by Agencies	<u>(896,363)</u>
Unspent Admin and Program Support Fees at June 30, 2013	<u><u>\$ 375,998</u></u>
Percent Unspent in Comparison to Available Funds	29.55%
Note: The percent unspent is calculated by dividing \$375,998 of unspent Admin and Program Support Fees from the total funds available for Admin and Program Support Fees available to the Agencies \$1,272,361.	

Conservation Education Staff & Labor Support

Effective for the program year ending September 30, 2014, the Company began allocating 4.2% of program dollars to help support labor related to the Conservation Education program. These funds are used to support the staffing and administration needs of each agency, specifically for conservation education activities. Conservation Education Staff & Labor funds are paid out to the agencies in monthly payments along with Administration and Program Support funds.

For this reporting program year, a total of \$229,507 was distributed to the Agencies for Conservation Education Staff & Labor, which was 4.2% of revenue collections and accrued interest.

Excluding the amount subsidized from other funding sources, the amount spent by the agencies from LIRAP funds was \$165,408, leaving an unspent Conservation Education Staff and Labor balance of \$64,099 at September 30, 2014. This funding has been distributed to the individual agencies and per their discretion can be carried forward into the next reporting program year to cover future Conservation Education Staff and Labor costs of the agencies. The table below represents a recap of the Conservation Education Staff and Labor spent and the amount available at September 30, 2014.

Table 5 – Conservation Education Staff and Labor

Table 5 OREGON LIRAP Conservation Education Staff and Labor October 1, 2013 through September 30, 2014	
ConEd Staff and Labor Carry Over from Program Year 12	\$ -
Program Year 12 - ConEd Staff and Labor	<u>229,507</u>
Net Funds Available for ConEd Staff and Labor	229,507
ConEd Staff and Labor Funds Spent by Agencies	<u>(165,408)</u>
Unspent ConEd Staff and Labor at September 30, 2014	<u><u>\$ 64,099</u></u>
Percent Unspent in Comparison to Available Funds	27.93%
Note: The percent unspent is calculated by dividing \$64,099 of unspent ConEd Staff and Labor from the total funds available for ConEd Staff and Labor available to the Agencies \$229,507.	

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 4 includes information provided by the Spokane Neighborhood Action Program (SNAP), 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 50% for customers between 0 and 50% of the federal poverty level (FPL); 45% for those between 51% to 100% FPL and by 38% 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

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

Table 6 - Energy Burden - Total Energy costs divided by household income

ENERGY BURDEN 2012/2013 ³								
		Energy costs are reduced by benefits for these calculations						
		Before Benefits	EAP or Avista	Plus Base and FEMA	Plus ProjectShare	Plus Senior	Plus Avista Emergency	All Benefits
0-50%FPL	N							
	1,294 elec	26.8%	14.9%	14.9%	14.8%	14.9%	14.1%	14.0%
	723 gas	25.8%	13.3 %	13.3%	13.1%	13.3 %	12.4%	12.2%
	2,017 all	26.4%	14.3%	14.3%	14.2%	14.3%	13.4%	13.3%
51-100%FPL	N							
	2,986 elec	9.0%	5.4%	5.4%	5.4%	5.4%	5.2%	5.2%
	2,072 gas	8.8%	4.9%	4.9%	4.9%	4.9%	4.6%	4.6%
	5,058 all	8.9%	5.2%	5.2%	5.2%	5.2%	5.0%	4.9%
101-125%FPL	N							
	771 elec	6.6%	4.5%	4.5%	4.5%	4.5%	4.3%	4.3%
	781 gas	6.2%	4.0%	4.0%	3.9%	4.0%	3.8%	3.8%
	1,552 all	6.4%	4.2%	4.2%	4.2%	4.2%	4.1%	4.0%

³ Table 6 – Information provided by Spokane Neighborhood Action Partnership (SNAP) and features their experience in Spokane County.

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. The results were as follows:

Agency	Heat	Emergency Share	Senior Outreach
Recommended Percent for Program Distribution	60%	26%	14%
Community Action Partnership Asotin	65.85%	31.23%	2.92%
OIC	67.07%	23.57%	9.36%
Rural Resources	57.00%	27.04%	15.97%
SNAP	65.26%	26.28%	8.46%
WGAP	85.90%	14.10%	0%
Community Action Center Whitman	21.68%	72.35%	5.97%
Total	62.74%	28.49%	8.77%

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 2013/2014 results for heating source assistance are as follows:

Agency	Electric	Gas
A Community Action Partnership Asotin	49.76%	50.24%
OIC	89.64%	10.36%
Rural Resources	85.31%	14.69%
SNAP	52.94%	47.06%
Community Action Center Whitman	64.99%	35.01%
Total	56.88%	43.12%

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. In the 2012/2103 program year, the Company aligned its LIRAP program year with the LIHEAP program year. 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:

Grant Type	2011/2012		2012/2013		2013/2014	
	Grants	Amount	Grants	Amount	Grants	Amount
LIHEAP	8,909	\$4,137,786	6,282	\$2,741,174	6,222	\$2,757,049
LIRAP	12,527	\$4,454,708	12,680	\$4,481,107	12,483	\$4,284,234

LIRAP Audit

As outlined in the UTC Settlement Stipulation for Dockets UE-100467 and UG-100468, the Company agreed that Internal Audit would perform an annual audit, for fiscal years ended 2010 through 2013, of current accounting practices relating to

compliance with regulatory treatment of utility expenditures, accuracy of jurisdictional allocations and allocations between utility and non-utility accounts for subsidiary and corporate-wide shared expenses.

Based on the procedures performed by Internal Audit of LIRAP tariff rider revenues, allocation of revenues to CAA's, and expense transactions that occurred from 1/1/13 to 12/13/13, it was concluded that LIRAP tariff rider revenues and allocation of revenues to CAA's are appropriately recorded. Additionally, it was concluded with 95% certainty that appropriate accounting of LIRAP expenditure transactions are occurring within a tolerable rate.

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 once this year with the LIRAP agencies in June following the end of the heating season. The discussion that occurs during the meetings provides direction for continued program refinement and clarity for program implementation.

In addition to the group meeting, the Company conducted training for energy intake staff at SNAP and the Community Action Partnership prior to the beginning of the heating season. The agenda for the sessions included overview of the CARES, and Avista Customer Service – both entities that interact with agency staff on a daily basis

for the processing of energy assistance grants. The session also covers the bill cycle, Avista online resources, customer billing and payment options, and effective use of the Company's "data exchange system" - the Avista Energy Assistance workbench.

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.

Conservation Education Activities

Agency Con Ed Programs and Practices

The agencies can use up to 6% of direct service funding 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 they request rather than a pre-packed kit that may contain things that they won't use. In addition to providing energy saving items to clients at the time of intake, Rural Resources that serves 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, at the time of intake, education and in-depth counseling and personalized troubleshooting is provided to high energy bill customers.

SNAP's primary LIRAP conservation education activities occur during intake and mailing of the home energy kits to grant recipients but the funds are leveraged for other conservation education activities that benefit the greater Spokane County, which includes Avista customers. These activities include community wide public awareness campaigns via television, workshops, a living green newsletter, promotional materials, and community outreach events.

[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 2013/2014 program year, SNAP coordinated the distribution of 11,265 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 their agency. The kits were funded out of SNAP's LIRAP conservation education allocations.

[Avista Outreach and Education](#)

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 and energy conservation.

The Company has provided calendars that include energy saving tips, energy use guides, and billing and options sheets to the agencies to support their conservation education and outreach activities.

The company hosts community workshops, energy fairs, and mobile outreach events and participated in general outreach events, to provide education and resources for home energy management and to raise awareness about the local agencies and the services they provide – most specifically energy assistance. For the 2013/2014 program year, approximately 4,885 individuals were reached through 58 events.

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 2013 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 92—Avista tariff including the electric surcharge LIRAP rate.
- Schedule 192—Avista tariff including the natural gas surcharge LIRAP rate.
- LIRAP 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);
- 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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