Low-Income Rate Assistance Program

(LIRAP)

Annual Summary Report

**For the program period October 2015 through September 2016**

**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 or “agencies”) in a manner similar to the Federal and State-sponsored Low Income Home Energy Assistance Program (LIHEAP). 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. The current LIRAP program is comprised of four components:

* LIRAP Heat: mimics the LIHEAP program in terms of income eligibility, intake requirements, and benefit calculation.
* LIRAP Emergency Share: LIRAP Emergency Share emulates the Project Share program that is funded through voluntary donations that are used to help customers in emergency situations.
* LIRAP Senior Energy Outreach: targets a third distinct customer group by providing a one-time per program year benefit of $100 or $300 to seniors with incomes up to 200 percent of the federal poverty level (“FPL”).
* Senior/Disabled Rate Discount Pilot: A rate discount program for senior and disabled households with fixed incomes between 126-200 percent FPL.

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

# Program Year Results

Approximately $4,468,665 of electric revenue was collected during the program year and $2,253,622 of natural gas revenue was collected for a total of $6,722,288[[1]](#footnote-1). For this program year, 14,811 electric and natural gas customers in the Company’s Washington service territory received total energy grants averaging $346 and the average LIRAP heat grant averaged $446.

 In this program year, 60% of LIRAP participants had household average incomes less than $15,000. Approximately 37% of the grant recipients had annual household incomes less than $8,000. Over 63% of the LIRAP participants had households of two or more people. Customers renting their residences constituted 73% 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



## Participants and Fund Distribution

Participants may have received a total of two grants from LIHEAP, LIRAP and LIRAP Emergency 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



 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 – Year 14 October 2015 – September 2016



## 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 disbursal to qualifying customers and for administration of the program. These funds are referred to as “Administration and Program Support Fees” or “Admin Fees.”

 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. Additionally, customers experiencing emergencies are eligible for assistance under LIRAP Emergency Share. 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 $1,054,675 was distributed to the Agencies for administration and program support fees support, which was 16.5% of revenue collections. This amount, including the $182,556 carry over from the previous reporting program year, totaled $1,237,231 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 $1,122,464, leaving an unspent administration and program support fees balance of $114,766 at September 30, 2016. Admin and Program Support Fees are paid out to the individual 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, 2016.

## Table 4 – Administration and Program Support Fees



## Conservation Education Staff & Labor Support

The Company allocates 4.2% of program funding 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”, or “ConEd S&L” 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 $268,462 was distributed to the Agencies for Conservation Education Staff & Labor, which was 4.2% of revenue collections. This amount, including the $140,311 carry over from the previous reporting program year, totaled $408,773 available for Conservation Education Staff and Labor.

 Excluding the amount subsidized from other funding sources, the amount spent by the agencies from LIRAP funds was $373,115, leaving an unspent Conservation Education Staff and Labor balance of $35,658 at September 30, 2016. 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, 2016.

## Table 5 – Conservation Education Staff and Labor



# 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 6 includes information provided by the Spokane Neighborhood Action Partners (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 54% for customers between 0 and 50% of the federal poverty level (FPL); 48% for those between 51% to 100% FPL and by 41% for energy assistance recipients between 101% and 125% of the FPL.

 Table 6 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 2015/2016[[2]](#footnote-2)**   |
| Energy costs are reduced by benefits for these calculations |
|   |   | **Before Benefits** | **EAP or Avista** | **Plus Senior** | **Plus Avista Emergency** | **All Benefits** |
| **0-50%FPL** |  |  |  |  |  |  |
|  | N |  |  |  |  |  |
|  | 1,012 elec | 18.3% | 10.0% | 10.0% | 8.9% | 8.9% |
|  | 475 gas | 18.0% | 8.% | 8.4% | 7.1% | 7.1% |
|  | 1,487 all | 18.2% | 9.5% | 9.5% | 8.3% | 8.3% |
|  |  |  |  |  |  |  |
| **51-100%FPL** |  |  |  |  |  |  |
|  | N |  |  |  |  |  |
|  | 2,091 elec | 7.1% | 4.2% | 4.2% | 3.9% | 3.9% |
|  | 1,148 gas | 6.3% | 3.3% | 3.3% | 2.9% | 2.9% |
|  | 3,239 all | 6.8% | 3.9% | 3.9% | 3.5% | 3.5% |
|  |  |  |  |  |  |  |
| **101-125%FPL** |  |  |  |  |  |  |
|  | N |  |  |  |  |  |
|  | 657 elec | 5.0% | 3.3% | 3.3% | 3.1% | 3.1% |
|  | 533 gas | 4.5% | 2.8% | 2.8% | 2.6% | 2.6% |
|  | 1,190 all | 4.8% | 3.1% | 3.1% | 2.8% | 2.8% |
|  |  |  |  |  |  |  |

Program Distribution Percentage

The percentages for program distribution among the three grant programs (i.e., LIRAP Heat, Emergency Share and Senior Outreach) are 60% for LIRAP Heat; 26% for LIRAP Emergency Share; and 14% for Senior Energy Outreach. The Direct Service distribution results for this program year were as follows:

## Table 7 – Direct Service Distribution

|  |  |  |  |
| --- | --- | --- | --- |
| **Agency** | **Heat** | **Emergency Share** | **Senior Outreach** |
| **Recommended Percent for Program Distribution** | **60.00%** | **26.00%** | **14.00%** |
| Community Action Partnership Asotin | 72.43% | 24.41% | 3.16% |
| OIC | 55.87% | 29.54% | 14.59% |
| Rural Resources | 75.12% | 13.97% | 10.91% |
| SNAP | 70.44% | 20.21% | 9.35% |
| WGAP | 96.79% | 3.21% | 0.00% |
| Community Action Center Whitman | 31.84% | 60.28% | 7.88% |
| **Total**  | 69.24% | 21.43% | 9.33% |

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 Assistance

 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 assistance grants issued, approximately 62% was electric and 37% was natural gas. The 2015/2016 results for heating source assistance are as follows:

## Table 8 – LIRAP Direct Service Assistance Allocation



# Regulatory Changes

## LIRAP Funding

In the Company’s 2015 general rate case[[3]](#footnote-3), the Commission approved a five-year plan to increase LIRAP funding by 7 percent or twice the percentage increase in Schedule 1 and Schedule 101 base rates, whichever is greater. This funding plan authorizes multi-year rate increases for Schedules 92 and 192, but does not change any LIRAP programs or the way that LIRAP funds are administered. These annual increases are communicated to the agencies by May prior to the start of the applicable program year. Annually the Company will file a revision to Tariff Schedules 92 and 192 to increase revenue for the program.

## LIRAP Modifications

The following modifications were approved by the Commission and were implemented for the October 2015 – September 2016 program year:

1. Funding will be allocated as a fixed annual budget, rather than collected and allocated on a month-to-month basis.
2. Avista will inform each Agency of its fixed annual budget allocation by the end of May each year.
3. Avista will establish a true-up mechanism for Schedules 92 and 192 and make an annual filing to adjust rates and collect the necessary program revenue.
4. Agencies will have discretion to spend the allocated budget during the program year in the manner that best fits their operation of the program.
5. LIRAP Heat grants may be awarded through the end of the program year according to Agencies’ planned program implementation, rather than ending concurrent with the LIHEAP grants.
6. Avista will establish an ongoing energy assistance program advisory group to monitor and explore ways to improve the program.
7. Agencies will explore using texting capabilities to improve appointment attendance.

## Senior and Disabled Customer Rate Discount Pilot

 Beginning in the October 2015 – September 2016 program year, Avista introduced a rate discount program for senior and disabled households with fixed incomes between 126-200 percent of FPL. The per kilowatt-hour and per therm rate discounts are designed to provide an average benefit of $300 per participant per program year, which is consistent with the grant amount provided through the existing LIRAP Senior Energy Outreach program[[4]](#footnote-4). Eligible customers may receive the rate discount for either one-year or the duration of the pilot intake period,[[5]](#footnote-5) whichever is longer. The rate discounts is $0.03153 per kilowatt-hour of electricity and $0.40663 per therm of natural gas. The pilot program is set to conclude at the end of the 2016/2017 program year.

The pilot program aimed to enroll a total of 800 participants (700 or 87.5% from SNAP, 100 or 12.5% from Rural Resources) between October 1, 2015 and September 30, 2017. The total budget for the two-year pilot is be $700,000, including $50,000 for a third-party evaluation.

### Participating Agencies

For purposes of the pilot, the Senior and Disabled Customer Rate Discount was conducted in both an urban (SNAP) and a rural (Rural Resources) area to allow data collection in both environments for evaluation purposes. The pilot was limited to these two agencies at this time due to several factors including, but not limited to, the cost to modify agency databases for the pilot, the impact of the cost of a third-party evaluation.

Following the third-party evaluation, the energy assistance advisory group evaluate whether to recommend continuation, modification or termination of the Rate Discount pilot, and the Company will make appropriate filings with the Commission.

### Program Results

 The Rate Discount Pilot served 763 individual households by the conclusion of the October 2015 – September 2016 program year. Of this amount, 516 customers received discounts for their electric service and 247 for their natural gas service. SNAP provided discounts to 672 customers and Rural Resources provide discounts to 91 customers. The below table summarizes this information.

## Table 9 – Rate Discount Pilot - Participants



The Rate Discount Pilot program experienced approximartly 90% of its enrollment during the months of March and April. By the end of that two month period, the total number of participants totalled 693 households. Prior to that period, the average number of residential customers receiving a rate discount was 217. Please see the table below to illustrate the enrollment of customers during the program.

## Table 10 – Participant Enrollment



The total dollar amount of discounts issued by the pilot program during the program year totaled $175,468 ($137,348 Electric, $38,120 Natural Gas). Of this amount, SNAPs customer base received $135,368 in discounts ($100,883 Electric, $34,485 Natural Gas) and Rural Resources’ customers received $40,101 in discounts ($36,465 Electric, $3,635 Natural Gas).

The goal of the Rate Discount Pilot is to provide each participating household with total annual discounts of approximately $300 for their service type. On average, customers participating in the Electric discount program received a total annualized benefit of $446.31 or an average monthly discount of $37.19. For Natural Gas customers participating in the pilot, the annualized average discount was $306.86 or an average monthly discount of $25.57. Please see the below tables to illustrate the monthly average discounts received by Rate Discount participants.

## Table 11 – Average Monthly Discount per Customer - Electric



## Table 12 – Average Monthly Discount per Customer – Natural Gas



The Rate Discount Pilot Program will continue through the October 2016 – September 2017 program year. At the conclusion of that program year, the Low-Income Advisory Group, supported by a third-party evaluation report, will evaluate the pilot program and make a recommendation to the Commission on the pilot results.

## True-Up Mechanism

 As per the Company’s joint petition, it was agreed that after the conclusion of the program year, the Company will file annually a true-up mechanism that will align the dollars collected with the annual budgeted amounts communicated to the agencies. The difference between the actual collections and the annual budgeted amount will be adjusted in the LIRAP rate schedules 92 and 192. For the current program year, LIRAP collections from customers exceeded the targeted budget by $113,246 ($97,621 Electric and $15,625 Gas). The resulting adjustment to customer rates would decrease the LIRAP rate so that actual collections from ratepayers would align with the program budget.

## LIRAP Emergency Share, temporary exception program

 Avista implemented a temporary exception for LIRAP Emergency Share for customers with extraordinarily high past due or final notices. This additional plan segment provides a solution for agencies when encountering customers where the current benefit design may not provide a solution to their situation. The temporary exception program aims to provide grants to those customers and help them remain connected to services. The program was implemented on August 8, 2016 and will conclude May 31, 2017. The parameters for qualifying for this program are that the customer can be up to 200% FPL and have made good faith payments and/or been in communication with Avista regarding their situation. Individuals applying for the exemption are approved by a CAA manager in collaboration with an Avista Customer Assistance Referral and Evaluation Services (CARES) representative. The maximum grant amount for each individual customer is up to 90% of the average annual energy bill (electric and gas) and has a maximum grant amount of $1,550.

 Since its August 8, 2016 starting date, $8,605.25 grants have been issued under Avista’s Temporary Exception program which has helped a total of to 13 customers. The average grant amount for these recipients was $661.64. It is anticipated that more grants will be distributed under the exception program as the 2016/2017 program year heads into the winter months.

# Program Process

## Agency Meetings

The Company met twice this year with the LIRAP agencies; first in May following the end of the heating season and then again in September prior to the launch of the heating season. The discussion that occurs during the meetings provides direction for continued program refinement and clarity for program implementation. Concurrent with the fall meeting, the introductory meeting for the Energy Assistance Program Advisory Committee was conducted. The original workgroup representatives along with Executive Director of Aging & Long Term Care were invited. During the meeting an overview of the committee’s purpose and introduction from the President of Evergreen Economics, the evaluator for the Rate Discount Program were presented.

In addition to the group meeting, the Company conducted training for energy intake staff at SNAP, and the Community Action Center 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 Energy Assistance workbench, where agencies can get customer usage and billing/payment history and post a grant.

# 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 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 are 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

## 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 Center (CAC) that serves Whitman County provided energy conservation information to 1,100 Avista customers during intake. During the assistance intake process, the CAC staff discusses energy saving measures and way to use conservation materials. . Rather than a pre-packaged kit, the CAC allows the families to choose the energy saving items that they will use in their home, those items include light bulbs, plastic window kits, and shower timers.

At the Community Action Partnership (CAP) that serves Asotin County customers can watch a rotating energy conservation presentation on the lobby screen and pick up informational brochures while they wait for their appointment. During the energy appointment, the intake worker reviews the customer’s bill with them, and refers those with high energy burden to the weatherization program. The CAP also posts energy conservation message on their Facebook page. The CAP provides their clients with energy saving items that are specific to their energy conservation needs; those items included night lights, light bulbs, water temperatures gauges, and refrigerator thermometers.

 Rural Resources makes, that serves Stevens, Lincoln and Ferry counties, makes energy saving items such as window plastic, weather-stripping, door sweeps, light bulbs, aerators, rope caulk, power strips, and information available to clients after their energy appointment. Additionally, at the time of intake, education and in-depth counseling and personalized troubleshooting is provided to high energy bill customers.

Serving Spokane County, SNAP’s primary LIRAP conservation education activities occur during the energy assistance intake appointment, workshops, outreach events, and televised interviews, social media, radio and website visitors. . SNAP conducted 21 conservation education workshops and participated at 46 community outreach events. Through all their activities, they reached 13,286 households and an additional 10,000 through media sources.

### 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 energy use guides, and billing and payment 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 throughout our service area, 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 2015/2016 program year, approximately 10,860 individuals were reached through 93 events through Avista hosted activities.

### 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.

# 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.
* LIHEAP: 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.

LIRAP Emergency Share: Funds provided for “emergency” purposes. Customers cannot receive both Emergency Share and Project share but can receive other forms of energy assistance.

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 Senior Energy Outreach: This program denotes an offering unique to low-income senior customers.
* Participants: Customers who received LIRAP grant(s).
* Tariff Schedule 92: Avista tariff including the electric surcharge LIRAP rate.
* Tariff Schedule 192: Avista tariff including the natural gas surcharge LIRAP rate.

# 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 Partners
* 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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1. Includes funding for both LIRAP and the Rate Discount Pilot Program. [↑](#footnote-ref-1)
2. Table 6 – Information provided by Spokane Neighborhood Action Partners (SNAP) and features their experience in Spokane County. [↑](#footnote-ref-2)
3. Dockets UE-150204 and UG-150205 Order No. 05 Issued by the Commission on January 6, 2016. [↑](#footnote-ref-3)
4. The actual benefit amount received by each customer may be more or less than $300 depending on actual usage. [↑](#footnote-ref-4)
5. Intake period runs annually from October 1, through September 30. [↑](#footnote-ref-5)