Low-Income Rate Assistance Program

(LIRAP)

Annual Summary Report

**For the program period October 2014 through September 2015**

**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[[1]](#footnote-1). 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)[[2]](#footnote-2). 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[[3]](#footnote-3) requirements, and benefit calculation.
* LIRAP Share Emergency[[4]](#footnote-4): LIRAP Share Emergency emulates the Project Share program funded through voluntary contributions 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[[5]](#footnote-5).

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 $4,130,679 of electric revenue was collected during the program year and $1,791,331 of natural gas revenue was collected for a total of $5,922,010. For this program year, 12,481 electric and natural gas customers in the Company’s Washington service territory received total[[6]](#footnote-6) energy grants averaging $362 and the average LIRAP heat grant averaged $461.

In this program year, 62% of LIRAP participants had household average incomes less than $15,000. Approximately 21% of the grant recipients had annual household incomes less than $8,000. Over 60% 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

|  |  |  |  |  |
| --- | --- | --- | --- | --- |
| 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 |
| 2014 - 2015 | $1,490,432 | $5,922,010 | $5,869,750 | $1,542,693 |

## 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



## 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.

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 Emergency Share. And for senior customers who exceed the federal income guidelines, there is LIRAP Emergency Share 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 $938,046 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 $375,998 carry over from the previous reporting program year, totaled $1,314,044 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 $1,113,074, leaving an unspent administration and program support fees balance of $200,970 at September 30, 2015. This funding has already been 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, 2015.

## Table 4 – Administration and Program Support Fees



## Conservation Education Staff & Labor Support

The Company allocates 4.2% of program 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 $238,775 was distributed to the Agencies for Conservation Education Staff & Labor, which was 4.2% of revenue collections and accrued interest. This amount, including the $64,099 carry over from the previous reporting program year, totaled $302,874 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 $192,373, leaving an unspent Conservation Education Staff and Labor balance of $110,501 at September 30, 2015. 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, 2015.

## 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 2014/2015[[7]](#footnote-7)** | | | | | | |
| 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 |  |  |  |  |  | |
|  | 736 elec | 24.9% | 12.8% | 12.8% | 12.0% | 12.0% | |
|  | 394 gas | 27.1% | 12.6% | 12.6% | 11.5% | 11.5% | |
|  | 1,130 all | 25.6% | 12.7% | 12.7% | 11.8% | 11.8% | |
|  |  |  |  |  |  |  | |
| **51-100%FPL** |  |  |  |  |  |  | |
|  | N |  |  |  |  |  | |
|  | 1,834 elec | 8.2% | 4.7% | 4.7% | 4.5% | 4.5% | |
|  | 1,130 gas | 7.9% | 4.0% | 4.0% | 3.8% | 3.8% | |
|  | 2,964 all | 8.1% | 4.4% | 4.4% | 4.3% | 4.2% | |
|  |  |  |  |  |  |  | |
| **101-125%FPL** |  |  |  |  |  |  | |
|  | N |  |  |  |  |  | |
|  | 497 elec | 6.3% | 4.0% | 4.0% | 3.9% | 3.9% | |
|  | 482 gas | 5.4% | 3.3% | 3.3% | 3.2% | 3.2% | |
|  | 979 all | 5.9% | 3.7% | 3.7% | 3.5% | 3.5% | |
|  |  |  |  |  |  |  | |

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 58.80% was electric and 41.20% was natural gas. The 2014/2015 results for heating source assistance are as follows:

## Table 8 – LIRAP Direct Service Assistance Allocation

|  |  |  |
| --- | --- | --- |
| **Agency** | **Electric** | **Gas** |
| A Community Action Partnership Asotin | 53.57% | 46.43% |
| OIC | 90.27% | 9.73% |
| Rural Resources | 83.77% | 16.23% |
| SNAP | 53.38% | 46.62% |
| Community Action Center Whitman | 73.73% | 26.27% |
| **Total** | 58.80% | 41.20% |

# Regulatory Changes

Avista has a history of prioritizing the development and implementation of programs designed to assist customers experiencing difficulties paying their energy bills. The main challenge faced by Avista and other parties continues to be determining the level of need in the community and how that information can help to further develop assistance programs.

In the Company’s 2014 general rate case,[[8]](#footnote-8) the Commission modified the settlement and 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. Further, the Commission established a process for parties to file mutually agreed upon modifications and additions to the LIRAP program in a shorter timeframe than contemplated by the Settlement. A workgroup comprised of various stakeholders that included representation from the Commission, Commerce, Attorney General’s Office, low-income advocates and the company (“Workgroup)[[9]](#footnote-9) held their first meeting via telephone on December 19, 2014, then followed with six face-to-face all day workshops, along with several planning conference calls from January 30 through May 1, 2015.

The following four goals were informed by the Commission’s order in that case, and guided the program modifications and additions ultimately agreed to by the Workshop:

* + - Keep customers connected to their energy service;
    - Provide assistance to more customers than are currently served;
    - Lower the energy burden of LIRAP participants; and
    - Ensure that LIRAP has the appropriate data to assess program effectiveness.

## LIRAP Modifications

In an effort to understand potential impacts of proposed modifications or additions, the Workgroup spent time examining some of the challenges arising from the existing LIRAP program design. 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.

## LIRAP Additions

The Workgroup explored various new program designs aimed at the four primary goals identified previously. After considering alternatives, the Workgroup agreed to the addition of a senior/disabled rate discount pilot to LIRAP. The rate discount pilot is designed to reach an additional customer group and may reach more senior customers than are currently being served under the LIRAP senior’s outreach program. Additionally, it lowers customers’ energy burden, and may be more effective in keeping customers from getting disconnected than a one-time grant.

A rate discount will be offered to fixed-income seniors and fixed-income customers with a disability, whose household income is between 126-200 percent of the FPL. This income eligibility requirement is consistent with the existing LIRAP Senior Energy Outreach requirement. 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.

The rate discount pilot will be implemented by SNAP and Rural Resources, which will aim to enroll a total of 800 participants between October 1, 2015 and September 30, 2017. The total budget for the two-year pilot will be $700,000, including $50,000 for a third-party evaluation.

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

# 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, the Community Action Center 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 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 reviews a “talk sheet” to discuss free energy saving tips, program information and vendor contact information. CAC also clients to pick up supplies early in the season (before their energy appointment) to provide opportunity to use the materials before the cold weather sets in. 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 the energy assistance intake appointment, workshops, outreach events, and televised interviews, social media, radio and website visitors. . SNAP conducted 64 conservation education workshops and participated at 38 community outreach events. Through all their activities, they reached 13,733 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 calendars that include energy saving tips, 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, 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 2014/2015 program year, approximately 7,475 individuals were reached through 79 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.
* LIRAP Heat: Benefit calculated using customer heating costs.
* LIRAP Emergency Share: Funds provided for “emergency” purposes.
* 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 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. LIRAP funding was removed from tariff Schedules 91 and 191 (Energy Efficiency tariffs) to Schedules 92 and 192 in 2014. [↑](#footnote-ref-1)
2. 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. [↑](#footnote-ref-2)
3. LIRAP intake is a process established to screen, acquire and record all mandatory household documentation to determine qualifications for heating assistance. [↑](#footnote-ref-3)
4. Emergency Assistance funded by LIRAP that replicates Project Share, customers cannot receive both but can receive other forms of energy assistance. Maximum payment guideline: $300. [↑](#footnote-ref-4)
5. Beginning in the 2015-2016 heating season. [↑](#footnote-ref-5)
6. 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 Emergency Share: For clients receiving “emergency” assistance (i.e., LIRAP Emergency 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. [↑](#footnote-ref-6)
7. Table 6 – Information provided by Spokane Neighborhood Action Partners (SNAP) and features their experience in Spokane County. [↑](#footnote-ref-7)
8. Dockets UE-140188 and UG-140189 (consolidated). [↑](#footnote-ref-8)
9. The Company, Commission Staff, The Energy Project, Public Counsel, NWIGU, and Agency representation from Spokane Neighborhood Action Partners (“SNAP”) and Rural Resources Community Action. [↑](#footnote-ref-9)