

March 23, 2020

Subject: Investor Owned Energy Assistance Programs Emergency Response to COVID-19

To whom it may concern

In response to the COVID-19 pandemic, the [White House](#) and [Washington State have declared States of Emergency](#). Last week, The Energy Project, in collaboration with Washington State Community Action Partnership, WA State Department of Commerce, and the agencies delivering energy assistance throughout the state convened to discuss protocols to protect the health and safety of clients, as well as the service providers themselves, while continuing to deploy assistance programs to keep people connected to essential electric and natural gas utility service. This document aims to make recommendations to not only further that goal, but also to significantly increase the number of households able to access energy assistance to meet what is expected to be an exponential increase in the need for utility assistance in the coming weeks and months.

Agencies are currently engaged in modifying their service delivery models to allow for social distancing in their delivery of LIHEAP and utility funded programs. These modifications include over-the-phone appointments, digital transmission of applications and documents, and mail-in applications. In addition to processing utility assistance applications, agencies continue to make referrals to other critical local services that support households' health and well-being. Additional LIHEAP and federal/state resources will also be available to households seeking investor owned utility assistance and agencies are preparing for these scenarios. Agencies are gearing up for delivering these benefits. Furthermore, based on actions taken in California and other states, agencies expect to be considered essential service providers in the case of a shelter in place declaration

The following are recommendations for consideration to reduce the expected negative impact from COVID-19:

Recommendation #1

Increase Available Funding for Energy Assistance through December 2020

While each individual investor owned utility has differing balances of unspent funds, The Energy Project's recommendation is to consider an increase of 50% of the annual budget for each of the investor owned utility's energy assistance budgets to account for a significant expected increase in unemployment. These funds would be made available through December of 2020 and would be collected in future rates through a true up mechanism.



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Recommendation #2

Modify Eligibility Requirements for Energy Assistance Programs

This recommendation is focused on meeting the immediate needs of households impacted by COVID-19 while reducing the administrative burden of processing applications.

- Allow for income verification from last 30 days of employment in lieu of full 3 months of income verification, as many impacted households will have instances of sudden loss of employment that may be long lasting.
- Allow for retroactive enrollment in two-year eligibility. Two-year enrollment in assistance programs has recently become available to clients in many investor owned utility service territories. Allowing agencies to retroactively enroll households in this offering will ensure that benefits continue with minimal administrative burden.

Recommendation #3

Modify Eligibility Documentation Requirements for Energy Assistance Applicants

In order to expedite the eligibility process, three tiers of income verification are recommended.

- Tier 1 (preferred)
 - Client is able to send over current income documentation electronically.
 - Client can send previous year's tax returns electronically.
 - Agency is able to determine eligibility through categorical means: household is eligible for SNAP, TANF, ERDC, UEI, SSDI/SSI.
- Tier 2 (accepted)-
 - If client is on a fixed income such as SSI/SSDI and has received energy assistance in the past 5 years, using income information from last appointment and calculating the increase.
- Tier 3 (last resort)
 - If unable to determine eligibility by any of the above means, client can self-declare their income. Staff will fill out self-declaration form and "sign" with a verbal authorization from the client.



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Recommendation #4

Allow for increased Administrative Support for Increasing Program Capacity

This recommendation allows agencies to incur additional expenses associated with delivering energy assistance to a significantly larger number of clients.

Expected costs may include mobile technology purchases, increased staffing, and overtime pay.

The Energy Project has requested emergency meetings with the five investor owned utilities' low-income Advisory Groups, UTC staff, Public Counsel, NW Energy Coalition, CAP agencies and other stakeholders during the week of March 23rd to discuss these recommendations as well as others from participants. We look forward to working collectively in identifying effective and comprehensive responses to the crisis at hand.

Sincerely,



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