

Cascade Fall 2022 Energy Assistance Term Sheet

Presented by: The Energy Project, NW Energy Coalition, Public Counsel

- 1) Do not file for or ask the Commission to approve of a new bill discount rate until Cascade:
 - a) Reviews the written concerns raised by the advisory group and discusses them with the advisory group.
 - b) Listens to presentations from the advisory group discussing their concerns.
 - c) Participates in at least 90 consecutive minutes of advisory group meetings every other week. At these meetings, Cascade will engage in good faith, with the spirit of productive conversation, collaboration, and compromise, to reach our shared goal of helping more customers.
 - d) Hires a third party, with experience working with named communities, to set the agenda and facilitate WEAFF advisory group meetings and bill discount rate meetings at least until a permanent bill discount rate is implemented.
 - i) This is necessary because Cascade’s facilitation of meetings does not provide an appropriate opportunity for advisory group members to explain their concerns or present alternative proposals.
 - ii) We request that future BDR program discussions focus on one element of the BDR program at a time, instead of covering the entire program design in one meeting. An in-depth discussion of individual program elements will allow participants to think through each aspect of the BDR program design and Cascade to more carefully design its BDR proposal.
 - iii) After each meeting, Cascade will provide meeting notes and respond in writing to any unresolved questions.
 - e) Provides a plan to conduct additional inclusive outreach, particularly through community partnerships. The plan should include specific steps, timeline for implementation, and commitments to funding outreach efforts.
- 2) As soon as possible, provide residential customers in need immediate assistance by automatically forgiving arrearages. We are open to identifying residential customers in need of arrearage forgiveness in many ways, including but not limited to:
 - a) Providing automatic arrearage forgiveness to all residential customers with arrearages that are a certain number of days past due and above certain dollar amount.¹
 - b) Using third-party data to identify residential customers in need. For example, PSE purchased data from Experian, and NW Natural purchased data from Epsilon, for this purpose.²

¹ This August in Docket UE-220656 and UE-220566, Avista used existing LIRAP funds to provide automatic grants up to \$350 for customer with a 60 day past-due amount larger than \$100. The Commission accepted the existence of a 60 day past-due amount larger than \$100 as an “estimate” of customers who are low-income qualified and did not require further documentation. Avista used approximately \$2.4m for the program and \$6m remained in the LIRAP program account after the grants.

² In Docket UE-210792 and UG-210792 PSE distributed approximately \$34.587 million of COVID-19 funds to help customers in arrears. PSE automatically provided grants to customers whose household income below 200 percent of the federal poverty level and had an arrear. To (footnote continued on next page)

- c) Using known low-income customers whose income was verified by a CAA in the past two years.
- 3) As soon as possible, raise the WEAF income eligibility threshold and, adjust the benefit calculation to account for the purchased gas adjustment rate increase.
 - a) On August 23, 2022, the Commission ordered Cascade to “raise the [WEAF] income eligibility threshold to 80 percent of area median household income (AMI) or 200 percent of the federal poverty level, whichever is higher.”³ We support increasing the WEAF income eligibility threshold as soon as possible.
 - b) For the 2022-2023 program year, adjust the benefit calculation by adding 25% to prior bill amounts, to account for the purchased gas adjustment rate increase of 23% and the GRC increase of 2%.⁴ Adjust the maximum benefit amount allowed per customer by adding 25%.

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determine eligibility, PSE purchased Experian data to estimate household income. PSE estimated household size based on the average size of households in the customers census block. The maximum benefit was \$2,500.

In Docket UG-220358 NW Natural used COVID-19 funds to provide automatic grants up to \$2,500 per household for two groups: 1) customers with past-due amount who received energy assistance in the past 2 years, and 2) “Using data from a third-party, NW Natural proposes to identify past-due customers who earn up to 200% FPL for auto-enrollment for CAP grants. NW Natural has acquired Total Source Plus data from a third-party, Epsilon, which derives the data from multiple sources including census data. The Total Source Plus data set includes household size and income data. Analyzing this data and cross-referencing it with our customer data, we have identified approximately 400 customers in arrears who earn up to 200% FPL that qualify for grants totaling about \$100,000. NW Natural’s proposal to add an auto-enrollment using this data will enable these grants to be applied.” Northwest Natural used approximately \$100k for customers identified used the Epsilon data, and had approximately \$450k remaining for the program after the grants.

³ Docket UG-210755, Order 09, ¶ 75.

⁴ PSE implemented a similar change to its HELP program after the 2022 PGA increase, and agencies are recalculating awards issued prior to the change to make sure that every customer served in the 2022-2023 program years gets the increased award.