



Low-Income Rate Assistance Program (LIRAP)

Annual Summary Report

For the program period October 2019 through September 2020

WASHINGTON

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Table of Contents

Overview	3
Program Year Results	4
Participants and Fund Distribution	5
Table 2 - Number and Amount of Grants by Program Component.....	6
Administration and Program Support Fees.....	9
Conservation Education Staff & Labor Support.....	11
Program Impacts	12
Program Distribution Percentage.....	12
Avista Electric and Natural Gas Assistance.....	13
Energy & Heat Burden.....	14
Program Administration	15
Senior and Disabled Customer Rate Discount Implementation.....	15
Senior/Disabled Rate Discount Outreach.....	16
True-Up Mechanism.....	18
Avista Energy Assistance Advisory Group	19
Agency Meetings.....	22
COVID-19 Hardship Grant & Referrals	23
2019 Low Income Needs Assessment	24
Conservation Education and Outreach	25
Agency Conservation Education Activities.....	27
Avista Outreach and Education.....	30
Avista and SNAP Energy Assistance Day	31
Energy Assistance Outreach.....	33
Senior Directories and Publications.....	37
Key Terms.....	38
Data Collection	39
Participating LIRAP Agencies	39
Contacts	39

Overview

Avista Utilities' Low-Income Rate Assistance Program (LIRAP), approved by the Washington Utilities and Transportation Commission (UTC or "Commission") in 2001, collects funding through electric and natural gas tariff surcharges on Schedules 92 and 192. These funds are distributed by Community Action Agencies (CAAs 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 energy costs.

Avista is committed to reducing the energy burden 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 improve affordability of basic costs of living for resource-constrained customers.

The current LIRAP program is comprised of five sub-programs:

- **LIRAP Heat:** mimics the LIHEAP in terms of intake requirements and benefit calculation. Effective October 1, 2020 the income eligibility for both LIHEAP and LIRAP Heat is 150% of the Federal Poverty Level ("FPL").
- **LIRAP Emergency Share:** LIRAP Emergency Share emulates the Project Share community fuel fund that is funded through voluntary donations to help customers in emergency or hardship situations.
- **LIRAP Senior/Disabled Energy Outreach:** targets a third distinct customer group that have incomes between 151% to 200% FPL by providing a one-time per program

year benefit of \$100 for customers who have an alternative heat source, or \$400 for customers who heat with Avista. Effective October 1, 2017 customers receiving disability income were added to the eligibility criteria for this grant. This program will end on September 30, 2021.

- **LIRAP Senior/Disabled Rate Discount:** A rate discount program for senior and disabled households with incomes between 151-200% FPL. This program was approved for full implementation for income qualified customers and launched on October 1, 2019.
- **LIRAP COVID-19 Hardship Grants:** Temporary modifications to LIRAP were implemented in April 2020, to help mitigate some of the economic impacts of the COVID-19 pandemic being experienced by Avista customers. These modifications allow customers to receive an additional emergency grant, similar to LIRAP Share, up to \$350. These temporary modifications have been extended to September 30, 2021.

Program Year Results

During the 2019-2020 program year, \$6,269,234 in electric revenue and \$3,638,922 of natural gas revenue was collected through Schedules 92 and 192, for a total of \$9,908,156.¹ In the Company's Washington service territory, 19,723 electric and natural gas customers received total energy grants averaging \$339 and the average LIRAP Heat grant averaged \$414.

56% of LIRAP participants during the 2019-2020 program year had household average incomes less than \$15,000, and approximately 28% of the grant recipients had annual household incomes less than \$8,000. 61% of the LIRAP participants had households of two or more people. Customers renting their residences constituted 71% of the total.

Table 1 below reflects the total budget of the Washington LIRAP program, the amount collected through Schedule 92 and Schedule 192, and the expenditures during the 2019-2020

¹ Includes funding for both LIRAP and the Rate Discount Pilot Program.

program year. Expenditure amounts include Direct Services, Administration, and Conservation Education.

Table 1 – Program Budget and Program Year Expenditures

Program Year October 1 - September 30	WA Program Budget	Program Year Expenditures²	Unspent Funding
Electric	\$6,230,483	\$5,627,190	\$603,293
Natural Gas	\$3,620,468	\$3,597,238	\$23,230
Total	\$9,850,951	\$9,224,428	\$626,523

The remaining unspent balance of \$626,523 is made available to Agencies in the 2020-2021 program year.

Participants and Fund Distribution

Avista’s LIRAP provided 19,723 grants in the 2019-2020 program year, with the total grant amount averaging \$339. Typically, participants may receive a total of two grants from LIHEAP/LIRAP Heat and LIRAP Emergency Share at different times during the program year. To address the financial hardships experienced as a result of the COVID-19 crisis, participants became eligible to receive an additional COVID-19 Hardship LIRAP Grant beginning in April 2020. This additional grant will continue to be offered through the 2020-2021 program year. The CAAs can serve a customer more than once in a program year if the household continues to experience hardship after receiving assistance, but the emergency grant maximum of \$350 can only be exceeded for customers with extenuating circumstances. To demonstrate the program impact in meeting the need, Table 2 below shows a year-to-year comparison of the number of grants issued for each program component, with the total and average amounts for each.

² Includes adjustments for refunds back to agencies of \$24,858. These adjustments release unused LIRAP funding back to the LIRAP program.

Table 2 - Number and Amount of Grants by Program Component

Year 19 - October 2019 through September 2020			
Program Component	Number of Grants	Grant Total	Avg. Grant Amount
LIRAP Heat	6,756	\$2,797,846	\$414
LIRAP Emergency Share*	11,996	\$3,528,478	\$294
Senior Outreach**	971	\$368,000	\$379
Total	19,723	\$6,694,324	\$339

*Includes 2,752 COVID Hardship Grants

**Does not include 516 Rate Discount enrollments

Year 18 - October 2018 through September 2019			
Program Component	Number of Grants	Grant Total	Avg. Grant Amount
LIRAP Heat	6,710	\$2,828,633	\$422
LIRAP Emergency Share	10,211	\$2,957,961	\$290
Senior Outreach	1,420	\$530,050	\$373
Total	18,341	\$6,316,644	\$344

Tables 3a, 3b, and 3c below show 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 and compiled by utility’s LIRAP Program Analyst. The information is sorted by traditional grants (LIRAP Heat, LIRAP Share, LIRAP Senior/Disabled Outreach), COVID-19 Hardship Grants, and the Rate Discount Program participants.

Table 3a – Demographic Data - Traditional Grants: October 1, 2019 – September 30, 2020

Washington LIRAP			
Data Compilation - TRADITIONAL GRANTS			
October 1, 2019 through September 30, 2020			
	# of Households	% of Households	Cumulative %
Home Ownership			
Own	4,797	28%	28%
Rent	12,174	72%	100%
Total	16,971		
Heating Fuel Source			
Electric	10,900	64%	64%
Natural Gas	6,071	36%	100%
Other	0	0%	100%
Total	16,971		
Size of Household			
1 Person	6,805	40%	40%
2 People	3,869	23%	63%
3 People	2,370	14%	77%
4+ People	3,927	23%	100%
Total	16,971		
Annual Income Level			
Under \$2,000	1,537	9%	9%
\$2,000-\$3,999	713	4%	13%
\$4,000-\$5,999	435	3%	16%
\$6,000-\$7,999	565	3%	19%
\$8,000-\$9,999	2,279	13%	33%
\$10,000-\$11,999	1,151	7%	39%
\$12,000-\$14,999	1,866	11%	50%
Over \$15,000	8,425	50%	100%
Total*	16,971		

*September demographic data not provided by one agency undergoing system upgrade. A weighted average was used.

Table 3b – Demographic Data - COVID-19 Hardship Grants: October 1, 2019 – September 30, 2020

Washington LIRAP			
Data Compilation - COVID HARDSHIP GRANTS			
October 1, 2019 through September 30, 2020			
	# of Households	% of Households	Cumulative %
Home Ownership			
Own	859	31%	31%
Rent	1,893	69%	100%
Total	2,752	100%	
Heating Fuel Source			
Electric	1,724	63%	63%
Natural Gas	1,028	37%	100%
Other	0	0%	100%
Total	2,752	100%	
Size of Household			
1 Person	824	30%	30%
2 People	690	25%	55%
3 People	458	17%	72%
4+ People	780	28%	100%
Total	2,752	100%	
Annual Income Level			
Under \$2,000	1,454	53%	53%
\$2,000-\$3,999	693	25%	78%
\$4,000-\$5,999	84	3%	81%
\$6,000-\$7,999	44	2%	83%
\$8,000-\$9,999	67	2%	85%
\$10,000-\$11,999	38	1%	86%
\$12,000-\$14,999	64	2%	89%
Over \$15,000	308	11%	100%
Total*	2,752		

*Demographic data available for 65% of participants. A weighted average was used.

Table 3c – Demographic Data - Rate Discount Participants: October 1, 2019 – September 30, 2020

Washington LIRAP - Data Compilation			
Senior and Disabled Rate Discount Program			
October 1, 2019 through September 30, 2020			
	# of Households	% of Households	Cumulative %
Home Ownership			
Own	391	76%	76%
Rent	125	24%	100%
Total	516		
Heating Fuel Source			
Electric	357	69%	69%
Natural Gas	159	31%	100%
Other	0	0%	100%
Total	516		
Size of Household			
1 Person	297	58%	58%
2 People	152	29%	87%
3 People	59	11%	98%
4+ People	8	2%	100%
Total	516		
Annual Income Level			
\$18,000/19,999	274	53%	53%
\$20,000/21,999	104	20%	73%
\$22,000/23,999	37	7%	80%
\$24,000/25,999	21	4%	84%
\$26,000/27,999	31	6%	91%
\$28,000/29,999	16	3%	94%
\$30,000/31,999	12	2%	96%
\$32,000 & over	21	4%	100%
Total*	516		

*Demographic data available for 49% of participants. A weighted average was used.

Administration and Program Support Fees

A portion of the revenue collected for LIRAP is provided to the six Agencies in Avista’s Washington service territory for the administration and delivery of the program to qualified customers. These funds are referred to as “Administration and Program Support Fees” or “Admin Fees” and are essential in supporting the Agencies in their ability to implement LIRAP. Avista and

its partner Agencies have developed and delivered essential LIRAP measures to ensure ease of access and sufficient benefit for low-income customers struggling to afford basic costs of living and to reduce energy burden.

Customer eligibility for LIRAP Heat is determined according to existing guidelines established by Federal and State standards used for LIHEAP. Effective October 1, 2017, LIRAP Heat income eligibility was increased to 150% FPL, thereby separating the eligibility guidelines upon which LIHEAP and LIRAP Heat were based, as LIHEAP income eligibility remained at 125% FPL. However, for the 2020-2021 program year, LIHEAP income eligibility will be changed to the same 150% FPL guideline.³

Customers experiencing energy emergencies and/or financial hardship are also eligible for assistance under LIRAP Emergency Share. Additionally, senior and disabled customers who exceed the LIRAP Heat income guidelines may qualify for LIRAP Senior/Disabled Outreach that is designed to be used in conjunction with the Company's Comfort Level Billing (CLB) payment option. Avista's CLB provides an approximate monthly average of the customer's estimated annual billings, therefore allowing the customer to pay a fixed 1/12th of their estimated annual bill each month.

For this reporting program year, a total of \$1,621,767 was distributed to the Agencies for Administration and Program Support Fees. This amount, including the \$420,812 carry over from the previous reporting program year, totaled \$2,042,579 available for the Agencies to use in the administration of LIRAP. Excluding the amount subsidized from other funding sources, the amount utilized by the Agencies to support program administration was \$1,623,545, which left an

³ The Company will continue to discuss LIRAP eligibility guidelines with its Energy Assistance Advisory Group, specifically the need to increase eligibility to the greater of 200% FPL or 80% Area Median Income as directed by the UTC's definition of low-income household in the context of the rulemakings implementing the Clean Energy Transformation Act.

unspent Admin Fees balance of \$419,034 at September 30, 2020. Table 4 below represents a recap of the Administration and Program Support Fees spent, and the amount available at September 30, 2020.

Table 4 – Administration and Program Support Fees

Admin and Program Support Fees	
October 1, 2019 through September 30, 2020	
Admin and Program Fees Carry Over from Program Year 18	\$420,812
Program Year 19 - Admin & Program Support Funds paid to Agencies	1,621,767
Net Funds Available for Admin and Program Support Funds Spent by Agencies	2,042,579
Admin and Program Support Funds Spent by Agencies	(1,623,545)
Unspent Admin and Program Support at September 30, 2020	<u>\$419,034</u>
Percent Unspent in Comparison to Available Funds	21%

Conservation Education Staff & Labor Support

The Company budgets 4.2% of program funding to help support the CAAs’ 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 “Con Ed S&L” funds are paid out to the Agencies in monthly payments, along with Administration and Program Support funds.

For this program year, a total of \$413,740 was distributed to the Agencies for Conservation Education Staff & Labor. This amount, including the \$138,543 carry over from the previous reporting program year, totaled \$552,283 available for Conservation Education Staff and Labor.

The amount spent by the Agencies from LIRAP funds was \$391,805, leaving an unspent Conservation Education Staff and Labor balance of \$160,478 at September 30, 2020. This funding

has been distributed to the individual Agencies and, per their discretion, can be carried forward into the next reporting program year for future Conservation Education Staff and Labor costs. Table 5 below represents a recap of the Conservation Education Staff and Labor spent and the amount available at September 30, 2020.

Table 5 – Conservation Education Staff and Labor

Conservation Education Staff and Labor	
October 1, 2019 through September 30, 2020	
Con-Ed Staff and Labor Carry Over from Program Year 18	\$138,543
Program Year 19 – Con-Ed Staff and Labor paid to Agencies	413,740
Net Funds Available for Con-Ed Staff and Labor	552,283
Con-Ed Staff and Labor Funds Spent by Agencies	(391,805)
Unspent Admin and Program Support at September 30, 2020	<u>160,478</u>
Percent Unspent in Comparison to Available Funds	29%

Program Impacts

Program Distribution Percentage

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

Table 6 – Direct Service Distribution

Agency	Heat	Emergency Share	Senior/Disabled Outreach	COVID-19 Hardship
Recommended Percent for Program Distribution	60%	26%	14%	No Distribution Target
Community Action Partnership Asotin	65%	21%	3%	10%
OIC	58%	28%	1%	13%
Rural Resources	60%	28%	3%	8%
SNAP	36%	45%	6%	13%
WGAP	88%	12%	0%	0%
Community Action Center Whitman	18%	58%	7%	16%
Total	40%	42%	5%	13%

Avista recognizes that each CAA’s service territory is unique and attributes the differences in program distribution to the diversity of need that each agency experiences.

Avista Electric and Natural Gas Bill 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 if those same customers also use Avista electric service. Of the total LIRAP assistance grants issued, approximately 64% were electric and 36% were natural gas. The 2019/2020 results for heating source assistance are as follows:

Table 7 – Percentage of LIRAP Grants Issued by Fuel Type

Agency	Electric	Gas
Community Action Partnership Asotin	41%	59%
OIC	97%	3%
Rural Resources	83%	17%
SNAP	62%	38%
Community Action Center Whitman	75%	25%
Total	64%	36%

Energy Burden

“Energy burden” is the percentage of income that households pay for energy service for a 12-month period. 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 8 below, which includes information provided by the Spokane Neighborhood Action Partners (SNAP), depicts reductions in the energy burden experienced by Spokane County bill assistance participants in the 2019/2020 program year. The column titled “Before Benefits” represents the energy burden to low-income customers prior to receiving the bill assistance benefits. Each successive column illustrates low-income customers’ energy burden after receiving the specified bill assistance benefit. Information for customer Energy Burden (Table 8) is for October 2019 through August 2020.

Due to the implementation of a new database during the program year, the information provided by SNAP is for eleven months, rather than twelve months. However, customer burden was calculated for twelve months.

Table 8 has been calculated as follows:

- The household 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 approximate annual income.
- Annual energy costs were determined by the actual previous 12 months energy usage from the date of application.

Table 8 - Energy Burden: Total Energy costs divided by household income

ENERGY BURDEN 2019/2020⁴						
Energy costs are reduced by benefits for these calculations						
% of FPL	Number of Customers	Before Benefits	Energy Assistance or Avista	Senior/Disabled	Avista Emergency	All Benefits
0-50%FPL	966 Electric	27.2%	14.9%	14.9%	14.9%	14.4%
	442 Gas	23.6%	13.9%	13.9%	13.9%	13.7%
	1,408 Total	26.1%	14.6%	14.6%	14.6%	14.2%
51-100%FPL	3,300 Electric	8.6%	5.2%	5.2%	5.2%	5.1%
	1,524 Gas	7.3%	4.7%	4.6%	4.7%	4.6%
	2,905 Total	8.2%	5.0%	5.0%	5.0%	5.0%
101-125%FPL	1,762 Electric	5.6%	3.8%	3.8%	3.8%	3.8%
	1,255 Gas	4.7%	3.3%	3.3%	3.3%	3.3%
	3,017 Total	5.2%	3.6%	3.6%	3.6%	3.6%

For customers receiving bill assistance benefits, the energy burden was reduced by approximately 45.5% for customers between 0 and 50% FPL; 39% for those between 51% to 100% FPL; and by 30.7% for bill assistance recipients between 101% and 125% of the FPL.

Program Administration

Senior and Disabled Customer Rate Discount Implementation

After a two-year pilot program from 2015-2019, Avista’s Senior/Disabled Rate Discount was approved by the UTC for full program implementation and permanent incorporation into its LIRAP offerings effective October 1, 2019. Senior and disabled households with fixed incomes between 151% to 200% of FPL are eligible to receive a rate discount on either their electric or natural gas service. The per kilowatt-hour and per therm rate discounts were designed to provide

⁴ Table 8 – Energy Burden information provided by SNAP features their experience in Spokane County; includes 11 months of data (October 2019 through August 2020).

an average benefit of \$400 per participant per program year, consistent with the grant amount provided through the existing LIRAP Senior/Disabled Energy Outreach program.⁵ The rate discount is \$0.03864 per kilowatt-hour of electricity and \$0.48469 per therm of natural gas.

To support the implementation of the rate discount for the Agencies, each agency was provided \$10,000 to support any administrative/program delivery work and system changes needed to establish the program within their organization. Rural Resources and SNAP already had the infrastructure to support the full program implementation, as both organizations were originally paid the same amount to implement the Rate Discount Pilot in 2015, and each agency had maintained their customer enrollment from the pilot.

Senior/Disabled Rate Discount Outreach

Rate Discount enrollments comprised 35% of total senior/disabled assistance during the 2019-2020 program year, while Senior/Disabled Outreach assistance increased by approximately 1% from the previous program year. A referral process was put in place to connect Rate Discount candidates identified by Avista Customer Service Representatives (CSRs) directly to the CAAs to initiate the application process. The Rate Discount referral process includes a screening procedure through which CSRs determine a customer's potential eligibility for the Rate Discount at the time the customer contacts the Company and expresses financial difficulty in paying their bill. If the customer is a senior (over the age of 60) and/or receives disability income and is within the income qualification range, the CSR informs the customer that he/she may qualify for the Rate Discount and if they are interested, their information will be shared with the local CAA organization and representative from the CAA will be in contact with them to complete the application and enrollment process. The CSR then initiates a letter notifying the customer that they may qualify

⁵ The actual benefit amount received by each customer may be more or less than \$400 depending on actual usage.

for the Rate Discount; the letter includes contact information for the local CAA as well as instructions for how to prepare for the call from the agency representative. Twice a week, a listing of Rate Discount candidates (as identified by Avista CSRs) is forwarded to the respective agency; the listing includes the candidates' contact information for the agency to initiate contact.

The Direct Service expenditures for the Rate Discount Program totaled \$220,422 in the first year of the discount's implementation. Table 9 below compares the distribution of Senior/Disabled Outreach grants and Rate Discount enrollments for the 2019-20 program year:

Table 9 – Senior/Disabled Grant & Rate Discount Participants and Funds Distributed

Senior/Disabled Outreach and Rate Discount 2019/2020 Program Year			
	<u>Participants</u>	<u>Total Grant/Discount Amount</u>	<u>Avg. Grant/Discount Amount</u>
Grant:	971	\$368,000	\$379
Rate Discount:	<u>516</u>	<u>\$208,918</u>	<u>\$405</u>
Total:	1487	\$576,918	\$388

As noted previously in this Report, the Senior/Disabled Outreach Grant program is currently being phased out, to be replaced fully by the Senior/Disabled Rate Discount and will conclude on September 30, 2021.

To raise awareness of and encourage enrollment for the newly implemented Rate Discount, Avista sought to promote the program through print advertisements in local publications, email and flyers throughout the 2019-2020 program year. All promotional materials featured information for the local CAA and flyers were available in Spanish for Grant and Adams Counties, in addition

to Russian and Ukraine languages for Spokane County. The following is a sample promotional flyer:



Avista Rate Discount Program
for senior citizens and people with disabilities

Avista has a rate discount for income-eligible seniors and customers living with disabilities. The program is administered by Rural Resources Community Action for Avista customers residing in Stevens, Lincoln, and Ferry Counties.

To find out if you're eligible, please contact Rural Resources at (509) 685-6000 or email energy@ruralresources.org.

Appointments will open on November 1st, 2019.

Program Overview

- › Rate discount can be applied to either electric or natural gas service (not both).
- › Approximate discounts of 3¢ per kilowatt-hour of electricity, or 48¢ per therm of natural gas.
- › Total discount amounts are based on customers' annual energy usage and may vary.

General Eligibility Guidelines

- › Avista electric or natural gas customer.
- › Either a senior citizen (60+ years of age) and/or individual living with a disability as verified by disability income.
- › An income within the following ranges (out of pocket, non-reimbursed medical expenses can be deducted from income total):

people in household	monthly income must be OVER	monthly income must be UNDER
1	\$ 1,562	\$ 2,082
2	\$ 2,115	\$ 2,818
3	\$ 2,667	\$ 3,555
4	\$ 3,220	\$ 4,292
5	\$ 3,772	\$ 5,028
6	\$ 4,325	\$ 5,765
7	\$ 4,877	\$ 6,502
8	\$ 5,430	\$ 7,238

If your income is lower than the lowest income in the chart shown you may qualify for other Avista assistance programs. Please contact Rural Resources or visit www.myavista.com/assistance to learn more.



True-Up Mechanism

Per the Commission's Order 07 in Docket Nos. UE-140188 and UG-140189, Avista developed an annual true-up mechanism for LIRAP Schedules 92 and 192 to ensure recovery of

the annual budget each year. The true-up mechanism established an annual filing by the Company, to adjust rates and collect the necessary program revenue, thereby aligning the dollars collected with the annual budgeted amounts communicated to the Agencies. Further, Order No. 05 in Docket Nos. UE-150204 and UG-150205 (*Consolidated*) established a five-year plan and true-up schedule which required Avista to file revisions to Schedules 92 and 192 by August 15th of each year, to increase LIRAP funding by seven percent, with annual funding increases beginning effective October 1, 2016, to continue through October 1, 2019. Order 09 in Docket Nos. UE-190334 et. al. then extended the five-year funding plan through Avista's next general rate case (GRC). In compliance with these aforementioned orders, Avista filed its annual seven percent rate increase, and its true-up of the estimated revenues collected for LIRAP to the actual collections for the prior October to September LIRAP program year, on July 31, 2020.⁶

For the 2019-2020 program year, LIRAP collections from customers were lower than the targeted budget by \$242,000 (\$177,970 under-collected for electric and \$64,030 under-collected for natural gas). These figures were included in the Company's July 31, 2020 filing, and were thereby taken into account with the rates approved by the Commission in Docket Nos. UE-200706 and UG-200707 for the upcoming program year (effective October 1, 2020).

Avista Energy Assistance Advisory Group

Avista's Energy Assistance Advisory Group (EAAG or Advisory Group) includes representation from The Energy Project, UTC Staff, SNAP, Rural Resources, OIC of Washington, Aging and Long-Term Care of Eastern Washington, Public Counsel, Northwest Energy Coalition (NVEC) and the Department of Commerce, as well as Avista staff from Regulatory Affairs and Customer Solutions. The purpose of the Advisory Group is to monitor and explore ways to

⁶ Docket Nos. UE-200706 and UG-200707.

improve LIRAP by evaluating existing and alternative program designs, to review administrative costs to ensure that more funding is directed toward meeting the program's goals, and to collaborate in establishing programs or ideas that may help to meet the current and future needs of Avista's vulnerable populations. The EEAG surpassed its typical cadence of meeting at least twice a year during the 2019-2020 program year, meeting a total of six times during the reporting period. Many of these additional meetings stemmed from responses to the COVID-19 public health and economic crisis, or to discuss other matters pertaining to various GRC requirements involving EEAG participation.

The year began with a regularly scheduled EAAG meeting in January, consisting of a presentation of the 2019 Low-Income Needs Assessment and LIRAP updates, but in March the group was quickly convened to strategize ways to best help customers in the midst of the COVID-19 pandemic and the associated economic impacts. The tasks for the Advisory Group further expanded in June 2020, as a provisions from the Company's 2019 GRC Settlement Stipulation came into play.⁷ Additional need to meet resulted from Docket No. U-200281, the Commission's Response to the COVID-19 Pandemic, which it adopted in its Order 01, a Revised Term Sheet that set forth various requirements, such as the provision of additional funding for bill assistance programs and creation of additional customer programs to help support COVID-19 recovery efforts for Avista's low-income customers, that made additional collaboration amongst the EEAG essential. During the last meeting of the year, a Company analysis to identify vulnerable populations in support of the Clean Energy Transformation Act (CETA) was presented, along with preliminary discussions regarding CETA's requirement to implement an Equity Advisory Group.

⁷ Order 09 approving the Settlement Stipulation in Docket Nos. UE-190334, UG-190335, and UE-190222 (*Consolidated*) contains provisions to develop a Disconnection Reduction plan within the confines of the EEAG, as well as a commitment to discuss potential renewable programs for low-income customers.

The following chart provides a listing of the 2020 EAAG meetings and the agenda topics:

Meeting Date	Agenda Topics
01/07/2020	(1) Low Income Needs Assessment, presented by Evergreen Economics (2) Update on Rate Discount Implementation (3) LIRAP 2018/2019 Program Year
03/26/2020	Emergency Meeting for COVID-19 Response (1) LIRAP Modification Proposal (2) The Energy Project COVID-19 Response
06/02/2020	(1) Update COVID-19 Modifications (2) Update Rate Discount Implementation (3) Staying Connected: Disconnection Reduction Plan (4) Renewables and Other Initiatives
07/14/2020	(1) LIRAP Update (2) Collections Data Overview (3) Uncollectible Rate Impact (4) Income Based Payment Plan & Balance Management Arrangement Program Impact
08/11/2020	(1) Review Staying Connected Framework (2) LIRAP Update
09/28/2020	(1) LIRAP Update (2) COVID-19 Modifications: Term (3) Disconnection Reduction: PIPP & AMP Design (4) Clean Energy Transformation Act

During the March “Emergency Meeting for COVID-19 Response”, the EEAG supported the implementation of a temporary COVID-19 Hardship Grant, along with other guideline modifications covered in detail later in this Report.

Additionally, as a result of the June 2020 discussions regarding the Company’s Disconnection Reduction Plan, a subcommittee was formed to work on the design for a Percent of Income Payment Plan (PIPP) and Arrearage Management Program (AMP) for customers with zero-income. The subcommittee included representatives from The Energy Project, UTC Staff, Public Counsel, the CAAs, and Avista staff from Customer Service, Regulatory Affairs and Customer Solutions. The EEAG unanimously supports the implementation of a PIPP and AMP in 2021, as part of the Company’s Disconnection Reduction Plan. A tariff revision proposing these

programs will be filed early in 2021. Finally, as a way to maintain momentum and stay informed of the ever-changing status of COVID-19 and other issues facing Avista’s low-income customers, the EEAG has agreed to meet regularly every other month from now until such time that the regular meeting intervals seem more appropriate.

Agency Meetings

Similar to the EEAG, the Company usually meets with the Agencies twice a year: first in the spring to review the activity of the heating season and to identify areas of strength or opportunity; then again in the fall, just before the heating season commences to share plans for appointments and outreach. COVID-19 presented a compulsory need to increase the frequency of connection between Avista and the Agencies to ensure that both parties were in sync to serve customers optimally during these unique and uncertain times.

The Agencies were convened on April 7, 2020 for the Company’s presentation of the proposed LIRAP COVID-19 Temporary Modifications that included the COVID-19 Hardship Assistance Grant, suspension of the LIRAP Emergency Share guideline that restricted award of emergency grant to one-time per year, and the update to mimic recently-instituted LIHEAP emergency modifications – specifically the eligibility verification requirements. The Company then met with the Agencies on April 9, 2020 to confirm the COVID-19 Hardship Grant referral procedure, application processing, reporting and eligibility criteria/verification.

The spring meeting on May 19, 2020 had an ambitious agenda, as several important topics needed to be discussed. These topics included: review of the 2019 Low-Income Needs Assessment (LINA),⁸ LIRAP Modifications, COVID-19 Hardship Grant, the implementation of the

⁸ Avista’s Low-Income Needs Assessment has been included as Attachment A to this Report.

Senior/Disabled Rate Discount, utilization of LIRAP Emergency Share, Agency Referrals, Working with Tribes, Outreach and the 2019 GRC provisions described previously.

Another meeting was held on July 23rd to provide an opportunity to connect and clarify any questions the agencies had due to the newly implemented Rate Discount and quickly implemented COVID Hardship grant and referral process as well as receive an update on Direct Service spending and balance.

COVID-19 Hardship Grant & Referrals

To provide support and assistance to customers who had been adversely affected by the pandemic financially, the Company drafted, obtained the support of the EEAG and submitted a tariff revision for the implementation of temporary COVID-19 Hardship Grant.⁹ The one-time grant is intended to provide assistance to customers who express financial hardship due to the coronavirus public health and economic crisis, consistent with the following criteria:

- No income guideline requirement;
- Customer vocalized COVID-19 related hardship;
- Maximum grant amount of \$350. However, each agency has the discretion to award an additional emergency grant for a total combined maximum grant allowance of \$700;
- Benefit covers only the amount owing on the customer's account (what is needed to bring the account current), up to the \$350 maximum, but should not result in credit on the account. However, at its discretion, the agency may contact Avista's Customer Assistance Referral Evaluation Services (CARES) department to obtain customer account history

⁹ Docket Nos. UE-200307 and UG-200308, filed on April 2, 2020 and approved by the Commission on April 10, 2020 to become effective on April 13, 2020.

information and, based on the information provided, may decide to award a Hardship Grant that *does* result in a credit if they determine that the circumstances warrant such an overage.

When the COVID-19 Hardship Grant was implemented on April 13, 2020, the LIRAP Direct Service balance was \$4.1 million. It was determined that funding would be ample enough to assist customers with LIRAP and inclusion of the COVID-19 Hardship grant. However, the EEAG supported the utilization of Direct Services in excess of 10% of the budget, if needed, and this “soft cap” provision was included in the approved tariff modifications.

In collaboration with the Agencies, Avista established a COVID-19 Hardship Referral Process that included warm transfers to the Agencies for customers who had called the Company and expressed financial hardship due to the pandemic. The Company obtained phone line information from each agency, inclusive of the times that the phone line is staffed and whether the line was a message line. The referral process also included a daily referral report that listed the customers that were transferred, to assure that customers were not lost through the referral process.

Additionally, the Company collaborated with three Agencies¹⁰ in September to provide an additional emergency grant to customers who had received a bill assistance grant, and possibly another emergency grant but who had a past due unpaid balance.

2019 Low-Income Needs Assessment

Avista contracted with Evergreen Economics to conduct a Needs Assessment of residential customers in their service area who would qualify for energy assistance up to 200% FPL. The full report is included as Appendix A.

¹⁰ SNAP, Rural Resource and CAC Whitman each submitted payment reports to provide an additional emergency grant for qualified customers.

Key highlights from the report:

- 95,387 customers are 200% FPL and below and qualify for federal LIHEAP and tariff funded LIRAP energy assistance programs (the latter includes the recently implemented Senior/Disabled Rate Discount).
- 20,255 received energy assistance benefits (LIHEAP, LIRAP Heat and Senior/Disabled Outreach) during the study period, there were 75,132 that did not receive an energy assistance benefit.
- Overall penetration of energy assistance among income-eligible customers is 21%. 24% in Spokane County to 0% in Franklin County - in general the highest penetration is where the majority of our customers are located and the counties farthest from Spokane that have a relatively small number of households served by Avista have the lowest rate of penetration among income-eligible customers (i.e. Skamania, Franklin, Grant, and Pend Oreille).
- Energy assistance penetration is higher among single household with a person living with disability, income levels 51-100% FPL, and those with high energy burden.
- Energy assistance penetration is lower among renters, income levels 101-125% and single senior households.
- Arrearage risk is higher in regions located on a reservation, among those receiving food stamps, and where there are children or seniors in the household. Arrearage risk is lower among limited English-speaking household and those receiving Supplemental Security Income (SSI).

Conservation Education and Outreach

Conservation Education (Con-Ed) is a key component of LIRAP bill assistance, as it supports the program's intent to encourage self-sufficiency among limited income customers.

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.¹¹ Based on this Order, Avista recognizes 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 a bill assistance grant are provided with energy conservation materials.
- Avista printed materials that feature information that may include but is not limited to:
 - Avista Assistance Programs, such as payment arrangements, comfort-level billing, preferred due date, and
 - Energy saving methods and resources
 - Outage preparation for those with medical equipment

¹¹ In 2015, the Company's Conservation Education funding level was reduced to .08%.

- Scam avoidance
- Electric and Gas Safety

Agency Conservation Education Activities

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 provides 1-on-1 conservation education to Avista clients in their offices in Pullman, Colfax, and other outreach locations throughout the county and their senior meal sites. Unfortunately, the pandemic forced the agency to close their office to the public and they have not been able to conduct any in-person conservation education since March 13, 2020. When their office shut down, the energy staff switched to mailing a brochure or flyer with an application and gave clients the option to pick up a conservation education bag in the CAC parking lot. During this program year, 1,953 Avista customers received conservation education through various assistance programs. An estimated 2,000 individual items were given out prior to the COVID-19 shutdown; this included LED light bulbs, plastic window kits, weather-stripping, door sweeps, and informational materials.

CAC uses various public information formats which include the CAC Energy Assistance Brochure, Energy Saving Tips Talk Sheet, Avista Energy Guides, and Avista Calling Cards. Their Agency Fall Newsletter provides information about bill assistance appointment availability, outreach locations, and tips for saving energy; the agency sends this out every year to anyone that has received services through CAC previously.

Rural Resources serving Stevens, Lincoln, Pend Oreille and Ferry counties, notified Avista customers in their annual application mailing that individuals could pick up a home energy kit from their local Rural Resources office (Colville, Ione, Davenport and Newport), or the Loon Lake Food Pantry. Approximately 700 of conservation kits were distributed to Avista customers. The

kits included LED light bulbs, rope caulk, weather stripping, and window plastic. 1,769 Avista customers received conservation education during their intake appointment. Customers with high usage receive education and in-depth counseling and personalized troubleshooting to address underlying causes and are referred for weatherization services. Rural Resource staff conducted outreach at Colville School District free immunization clinic and Head Start meetings, reaching approximately 56 families at these events. Con-Ed materials were distributed with instructions provided on how to use the items. Due to COVID-19, Rural Resources also gave away free masks to low-income households. Households had the option of receiving the masks by mail, and Avista flyers that provided information on billing and payment options were inserted in those mailings. The masks with flyers were sent to approximately 150 households.

OIC of Washington has a television in the lobby area. The intent of the television is that every client who walks in for service will be informed on how to improve energy conservation in their home. The slow running PowerPoint presentation includes energy saving tips that highlight the highest consumption for energy use, common areas for air leaks, thermostat settings, and how to save water. The PowerPoint is English and Spanish. Additionally, a case manager follows up with clients during intake to reinforce the steps they can take to conserve energy. OIC also conducts outreach by setting up tables at local food banks, community events, health centers, and connecting with school personnel and parenting programs. OIC also has announcements that are featured in the newspaper and radio broadcasts. The agency estimates that 6,000 Avista customers were reached through their public awareness campaign in Grant and Adams counties, and 3,400 were provided with energy saving items, such as caulking tape, LEDs bulbs, switch/outlet gasket covers and print materials.

Serving Spokane County, SNAP's primary LIRAP conservation education activities occur during the bill assistance intake appointments and through other mediums such as displays in

offices, workshops, outreach events, partner communication, SNAP ambassadors, social media, the agency reader board and the organization's website. SNAP conducted three conservation education workshops for approximately 84 Avista customers and non-Avista individuals living in Spokane County (with an estimated 80% of attendees being Avista customers) during the 2019-2020 program year. SNAP also provided conservation education to 25,858 households (80% Avista customers), of which 16,847 received materials. 2,500 of these households were assisted at a four-day bill assistance walk-in event which was held at the fairgrounds in October 2019; the first two days were conducted in partnership with Avista. During 20 community partner outreach events, SNAP provided 524 individuals with conservation education and energy efficiency items. Additional outreach occurred at school events, including parent night at a local middle school, an elementary community meal event, and an ECEAP parent resource fair. A total of 204 households received energy efficiency items at school events. An additional 33 residents attended a supported living apartment workshop and obtained conservation education and efficiency items.

SNAP was forced to cancel a total of seven scheduled outreach events due to COVID-19. In lieu of these canceled events, 13 area food banks received LED lightbulbs and program printed materials, reaching a total of 600 people. SNAP also organized food delivery outreach which included LED lightbulbs for 40 families as well as provided conservation education kits to their single-family and essential home repair clients. The conservation items provided included: LED lightbulbs, large window plastic, LED nightlights, outlet switches, summertime magnets, rope caulk and hot water temperature measurement cards. Face masks were provided to 650 face masks within the community. While SNAP's Conservation Education outreach was significantly restricted after March 10, 2020 due to COVID-19, program changes have been implemented for the 2020-2021 season in response to the continued community shut down. These changes include contactless delivery of Con-Ed kits to residents, as well as allowing participants to request kits via

phone and email. SNAP will also continue to provide Con-Ed resources to local food banks, community centers and other community partners as part of outreach efforts.

The Community Action Partnership (CAP) serving Asotin County conducted conservation education conversations with 418 LIRAP recipients from October 1, 2019 to March 24, 2020. They also offered brochures and a conservation education slide show in their lobby. The office was closed to the public from March 25, 2020 onward due to COVID-19 which impacted their ability to implement further conservation education activities.

Avista Outreach and Education

The majority of households seeking assistance contact the Community Action Agencies directly. However, Avista has a variety of methods to support outreach efforts to engage those in need to promote the availability of assistance programs, guide them to the Agencies and provide energy conservation education and resources.

The Company has provided energy use guides, and billing and payment options sheets to the agencies to support their conservation education and outreach activities. Avista also hosts community workshops, energy fairs, and mobile outreach events and participates 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 bill assistance.

Avista outreach was suspended for a period of time due to COVID-19 while the team strategized about how outreach could still be conducted while protecting staff and public safety. During this time, energy saving items along with information on billing and payment options and bill assistance were dropped off at food banks and provided to partners for their clients. For the 2019/2020 program year, approximately 7,012 individuals were reached through 89 Avista-hosted

events and activities. Where possible, the Company and Agencies collaborate to participate at community events. At these events, Avista focuses on providing energy saving information and resources and the Agency will promote their services, with a focus on bill assistance and weatherization.

In the summer months, fans were purchased and distributed by SNAP, Rural Resources and Avista to customers who were identified as needing help with keeping cool.

Avista and SNAP Energy Assistance Day

The 4th annual Energy Assistance Day, hosted by Avista and SNAP, was again a two-day event held on October 1 and 2, 2019. The objective was to process bill assistance appointments for approximately 700 income-qualified customers each day, and to achieve the following goals:

- Build awareness of bill assistance programs;
- Reach new customers;
- Connect with customers and reinforce Avista’s commitment and advocacy for vulnerable customers; and,
- Further leverage SNAP’s infrastructure by reaching more customers through the event.

To help conduct the event, approximately 100 Avista employees, along with over 50 SNAP employees, are needed each day. In 2019, 1,437 Avista customers were qualified for bill assistance at the two-day event. Prior to the event, eligible customers were able to schedule a bill assistance appointment at a time that was convenient for them.

Walk-ins were served on an “as available” basis. After each attendee completed their appointment, they could visit the energy fair, where they received an energy savings kit that included items to help weatherize their homes. At the fair, customers could visit demonstrations tables where Avista employees demonstrated the easy ways to install the weatherization materials in the kit. Attendees could also visit with community service partners who provided information

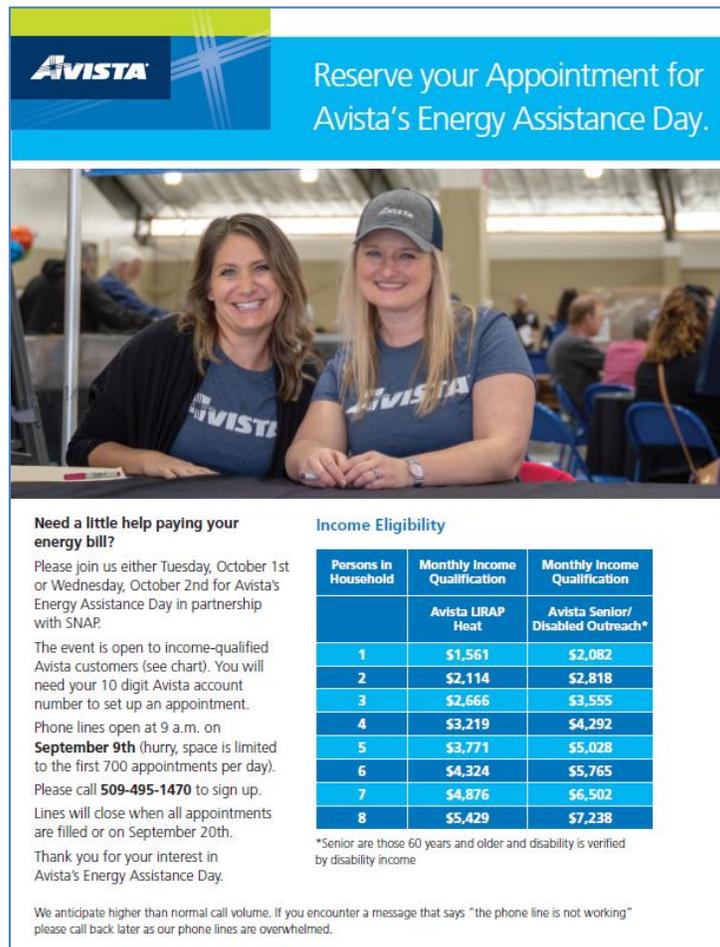
on a variety of topics such as Medicaid Enrollment, employment, affordable health insurance and health care, transportation services, air quality, water conservation, 211 referral services, kinship and caregivers support, the city library, and meal delivery. All attendees were also provided with a meal. The energy fair is free and open to the general public. 2,800 kits were distributed during the two-day event, which is a sizable increase in comparison to the 2,286 kits distributed at the 2018 energy fair. Customer feedback from the program was overwhelmingly positive, and the event was followed by walk-in days hosted by SNAP. At this event, Avista Outreach provided 224 home energy kits to attendees.

The Company also partnered with Rural Resources to host a similar event in Colville to make the energy fair service available in a rural setting. The shared objective was to conduct appointments for 100 individuals during a one-day event. In addition to completing close to 100 appointments, 229 kits were distributed to customers through the energy fair.

Hosting these collaborative events also provides an opportunity for Avista Customer Service Representatives and agency intake workers to meet in-person. Much too often these staff interact daily and several times a week by telephone; the event provides them an opportunity to meet in person, connect a face with a name and helps to foster the spirit of partnership for the work they do to help customers collectively. Below is a picture of Avista and SNAP intake workers at the October 2019 event at Spokane County Fair & Expo Center.



Included below is a sample of the flyer that was distributed to community partners to share with their clients. Similar promotions were used for email and print advertisement in local publications.



AVISTA Reserve your Appointment for Avista's Energy Assistance Day.

Need a little help paying your energy bill?
 Please join us either Tuesday, October 1st or Wednesday, October 2nd for Avista's Energy Assistance Day in partnership with SNAP.
 The event is open to income-qualified Avista customers (see chart). You will need your 10 digit Avista account number to set up an appointment.
 Phone lines open at 9 a.m. on **September 9th** (hurry, space is limited to the first 700 appointments per day). Please call **509-495-1470** to sign up.
 Lines will close when all appointments are filled or on September 20th.
 Thank you for your interest in Avista's Energy Assistance Day.

Income Eligibility

Persons in Household	Monthly Income Qualification	
	Avista LIRAP Heat	Avista Senior/Disabled Outreach*
1	\$1,561	\$2,082
2	\$2,114	\$2,818
3	\$2,666	\$3,555
4	\$3,219	\$4,292
5	\$3,771	\$5,028
6	\$4,324	\$5,765
7	\$4,876	\$6,502
8	\$5,429	\$7,238

*Senior are those 60 years and older and disability is verified by disability income

We anticipate higher than normal call volume. If you encounter a message that says "the phone line is not working" please call back later as our phone lines are overwhelmed.

Energy Assistance Outreach

When requested by an agency to help promote the availability of bill assistance to customers, Avista will send targeted emails informing customers of their local CAA and the assistance that is available. The email includes the income guidelines for qualification along with the agency contact and appointment information. The Agencies that have requested this promotional support report that the emails are effective in heightening the number of scheduled bill assistance appointments. In April 2020, the Company sent out email notices to customers to

raise awareness about bill assistance resulting in a 218% increase in the *Agency Search* page being utilized on the company website, in comparison to April 2019.

Ensuring customers are aware of and connected to assistance is an important objective of Avista's Outreach and Education program. In addition to including assistance and agency information to customers during outreach activities, referrals to the Agencies from Avista staff is process that is effective closing the gap between referring a customer to an agency and ensuring they are connected to the program. An example of a process that supports connecting possible candidates for assistance is SNAP's secure vendor referral site for customers. Avista CARES staff can access the site through a secure log-in, enter customer information and SNAP will contact the customer to set up an appointment.

To provide customers with information about the bill assistance options available to them, Avista arranges digital and print advertisements throughout its Washington Service area and provides similar inserts in all residential bills. An example of that advertisement along with the bill insert are featured on the following pages.



Looking for energy bill assistance? We have options.

Avista partners with community agencies to provide financial assistance, plus we offer other services to help you manage and pay your bill.

- **Energy Assistance Grants** are available for income-qualified residential customers. Funds are distributed to qualifying customers through local community agencies – please call us at 1-800-227-9187 to find your local community agency or visit myavista.com/assistance.
- **Comfort Level Billing** divides yearly energy costs into 12 equal and predictable monthly payments.
- **Preferred Due Date** helps align your bill's due date with payday.
- **Payment Arrangements** can be made on an individual basis for those in need.

For more ways we can help, please call 1-800-227-9187 or visit myavista.com/covid-19.



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- **Energy Assistance Grants** are available through local community agencies for income-qualified residential customers. To find an agency near you, call Avista at 1-800-227-9187 or visit myavista.com/assistance.
- **Comfort Level Billing** divides yearly energy costs into 12 equal and predictable monthly payments.
- **Preferred Due Date** helps align your bill's due date with payday.
- **Payment Arrangements** can be made on an individual basis for those in need.

In addition to the Company's outreach efforts, Avista has a dedicated team of specialized customer service representatives – its CARES Department – that works with customers experiencing circumstances such as medical crisis, unemployment, family hardships, or other special conditions that may impact the customer's ability to pay their utility bill. CARES strives to connect qualified customers to bill assistance programs, provides specialized payment arrangements, and often delay disconnection processes to accommodate this work. Periodically, the Avista CARES team sends out letters or makes calls to customers on their caseload to ensure

they are connected to bill assistance; approximately 44% of those on the CARES caseload receive bill assistance.

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. Additionally, as part of our outreach program for seniors we provided home energy kits in the fall to home bound seniors through *Meals on Wheels* in Spokane and Stevens counties.

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 bill 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% of the federal poverty level or 60% 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 bill assistance.
- LIRAP Heat: For clients receiving “regular” bill assistance (i.e., LIRAP Heat), the eligibility determination is the same as the Federal LIHEAP program; however, LIRAP income guideline goes to 150% FPL. 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 (Spokane County)
- Opportunities Industrialization Center of Washington (Grants & Adams Counties)
- Community Action Center of Whitman County
- A Community Action Partnership (Asotin County)
- Washington Gorge Action Programs (Skamania and Klickitat Counties)
- Rural Resources Community Action (Lincoln, Stevens, and Ferry Counties)

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