

WEAF Advisory Group

Agenda

February 8, 2023

KEY TOPICS: Decisions and general agreements from 1/25/23 meeting, arrearage pledges and bill discount rates by tier, income and other data to be collected by company and agencies.

GOALS FOR MEETING OUTCOME: Ensure agreement from 1/25/23 decisions, decide on arrearage pledge percentages and bill discount rates by tier, develop initial list of data to be gathered by the company and agencies.

1. Recap of decisions and general agreements from 1/25/23 meeting – Dan Tillis

Dan - The Minutes and the agenda both included a recap of key decisions or general agreements from the January 25th meeting. But the first agreement we had was the tiers to utilize, and there were two options we considered. We chose the five tiers with each having an FPL and an AMI range and that's listed here. Then we had general agreement that customers will be able to self-attest to income and household size, and that we should have a post qualification verification process of some sort that will very likely be conducted by the Community Action agencies.

Yochi – We agreed that we would have both FPL and AMI for each tier. I'm OK with five tiers, but I don't recall if that was explicitly part of the with it. I guess I might be open to a different number four or six or five, but that that seems like a good starting point.

Dan - I think that will lead us soon into the conversation for item 2 where Chris will walk us through what he did with that spreadsheet, and right now it's set up with five tiers, but it's subject to change a little bit as we evolve through the conversation. So, one thing that I wanted to ask about real quick is the new programs Cascade employees would start qualifying customers for energy discount rate discounts, and arrearage pledges whether that's complete arrearage forgiveness for some customers and some other approach for higher FPL AMI customers, or you know complete arrears forgiveness of some sort. Do we all agree that the Cascade employees will use a calculator? The same as the agencies to receive the customer self-attested income and household size, and qualify them for assistance, and then have a referral process where we get that information to the Agency so that they can work with the customer on their other programs.

The group agreed we will utilize the tier structure listed below.

T1	0-25% FPL, 0-10% AMI
T2	26-50% FPL, 11-20% AMI
T3	51-100% FPL, 21-40% AMI
T4	101-150% FPL, 41-60% AMI
T5	151-200% FPL, 61-80% AMI

There was general agreement among the group on the following:

- Customer self-attestation of income, HH size, etc.
- Establishing a post-qualification verification process.
- Post-qualification verification process likely to be conducted by the Community Action Agencies.

2. Arrearage pledges and bill discount rates by tier (see Excel attachment) – Chris Mickelson

Corey - Seems to make sense and based on the conversations we've had, but obviously we have to work out the details of exactly what that looks like.

Yochi - With these programs, as we're moving towards self-attestation, I think we're ok with having the utility enroll customers, provided that were also tracking to see how many of those customers that the utility enrolls are able to make it to a Community Action agency appointment for consideration for weatherization, and other services. We're ok with having the utility as an entry point as long as we're continuing to track and still able to get customers through to the CA and track the success of that referral process.

Chris - I thought we had agreement on tiers based off what Avista had and your concern was really tier one and two. You have 0 to 5% FPL, or 0 to 10, or 0 to 25 like we initially proposed. Unfortunately, I can't put FPL/AMI and still have calculations work. I'm showing what Tiers 1 through 5 look like as FPL and tiers 1 through 5 look like as AMI, just visually. The stepper part within this region is that arrears and management based off whatever discount percentages we come up with. I put in these numbers just to help show what calculations are. This is looking at energy discount and the bills, so here's the discount amounts. Here is each of the customer counts for each tier, what their average bill is, and this is at current rates, so that has the latest 25% increase due to the PGA and everything else. He showed what that discount would be, what that post bill would look like, and then ultimately what the cost is. I take that post bill, the average assistance we've been noticing these customers get and what their ultimate account balance would look like. Showed energy burden by tier is before the discount, and what it would look like after. Goal was to set it at 2% realizing 6% is average overall energy burden. But that includes all utilities, figuring natural gas is anywhere from half to 1/3 of that percentage, so I just set it to 2% to get everybody at 2%. He continued to review the breakout. I'm assuming 10% enrollment rate at least for that first year, we average around 2200 a week. If we get 10%, that puts us close to 6000 customers. I think that's pretty good for that first year. Obviously, we need to include agency funding fee. I just put in the current amounts right now, 75 CBO is 3% with the Commission's order of the 73, as that minimum. I have the rate spread as a drop down, so you could select different ways to spread it. So that's kind of a very quick high level. Any questions?

Yochi - I will admit that I did not have a chance to go through it in advance. I just looked at the agenda. It's great that we have these toggles and that we can play with it and see what it would do. You have a 100% discount set now for the lowest tier.

Chris – For arrears management, we haven't really talked about that, but here's the energy discounts of what we would be looking at to get to all the customers to a 2% energy burden.

Lorena - My question has to do with the arrearage management - If the current thinking of CNG is that the arrearage management won't exactly function like a traditional arrearage management

plan, which is, you know where a client is paying so much per month while part of it is being forgiven, it's going to be like an upfront grant based on what the current arrearages are kind of like what you proposed

Chris - I don't know if we came to a full conclusion on that. I think last time we talked, Yochi was interested in seeing the 1/12th approach method. Dan indicated, at least from Cascades point of view, it doesn't really matter if you give 1/12th or all of it up front, but I don't know if we exactly landed on one way or the other.

Dan - I agree we had some good discussion about it, I think, and several other folks shared their thoughts on why the 1/12th for certain income levels is preferred. And then you know the company, I think mostly be shared our perspective online. We think the other approaches is preferred. We didn't make a decision on that two weeks ago. If it's something we need to decide on before we make any decision on the discount percentages, then we could do that today. I don't know how much it would affect the discount percentages, I think we would still go with whatever the right discount percentage is for the customers in each, and I'm sure I'm the arrearage management pledge amount is for each customer based on income level and then if there's 50% leftover, do we require them to pay that 50%? Do we split it over 12 months or do we just give it to them and set up a pay plan or payment arrangement for the rest without stopping that pledge amount. If they don't meet a monthly commitment for the remaining balance would that change the pledge amount for the discount percentage.

Chris - For this calculation, no, it won't impact this analysis whether we do 1/12th or all of it up front. And it doesn't impact the energy burden.

Any thoughts on the tiers or anything else? Yochi - you indicated 4, maybe 5, maybe 6. Last time you were talking this is closer to 5%, like Avista?

Yochi - The reason why I brought up six is because as you may know, PSE is looking at figuring this out now as well. And at our last meeting they proposed 6 tiers, and I think for ease of again understanding amongst customers and perhaps agencies, I was thinking having some alignment between utilities with overlapping areas might be nice. I'm generally comparable with 5 or 6 tiers. Two things to note about the arrearage forgiveness is that you know when Avista set up their program, I believe that they have designed it so that customers up to 50% FPL get 100% of their arrearages forgiven.

Chris - I'm not sure what exactly they give for tiers 3-5, but at least on their presentations they show 100% up to 50. That is what I put in. At least these three are what currently these customers get based off WEA and I put these higher than what they would get from WEA, and it was more just placeholders. These aren't obviously set in stone, but just to start that conversation, so we could see what program costs are and what we would be looking at. It sounds like you're wanting essentially that.

Yochi - I was just pointing out that we've seen that, with Avista. I have to admit I'm interested in hearing feedback from others as well. I don't know that I'm ready to come in saying exactly what I want today having seen this for the first time.

Chris - Any others with some feedback?

Corey - I have to take a closer look at that, but where can find alignment between utilities, even if there's nothing overlapping the service territories. I think that's a good thing. The extent we can be aligned with Avista, I think that's good.

Chris – Where Tier two ends and Tiers 3,4, and 5 are exactly like a Vista. The only difference is their tier one stops at 5% versus 25, and I can make this kind of plug and play. The green areas are where you put inputs or they're a drop down of some sort. So, then you could go in change and it will all flow through. Are we looking to have the first tier to be a much smaller percentage of customers who qualify? Are we wanting to go to 25? Are we able to get agreement on that this go around or do people need more time to analyze and play with this?

Lorena – So, you changed the FPL in the arrearage management and then that automatically is updating stuff down in the energy discount section.

Chris - This automatically calculates where it would be on an AMI basis.

Corey - The longer I look at this I would be more comfortable having the first year being more income inclusive, so 25% makes more sense.

Yochi - So the trade off, I think that we're making here Corey, is if you have a tighter or a smaller first year where, say you're only going from zero to five, you can have a much higher percentage discount for those bills. And, if we're looking to keep that energy burden around 2%, then you're likely to make that first tier bigger, you're likely to have a little bit of a perhaps lower discount in that first tier to hit that target energy burden. I've been thinking about this and it could be wrong, but if you have a really small first, you can give those customers in the most need of a really big discount.

Chris - That is correct. I'm trying to keep these towards 2%. And right now, they're getting an energy discount. Obviously, those with very little income, the energy burden is very large and they're still above 10% and so it looks like a 54% would get him back to that 2% range. But you also have a much smaller group of customers, so that it that is the tradeoff of a larger range of smaller discount, a tighter range, a larger discount.

Lorena - To the count of either in the bills or the arrearage section, are those CNG's estimates of how many households will fall into each of these categories currently?

Chris - Yes. Based off our report that we filed initially, when we did an energy discount program, how many customers would fall and what percentage? And this was part of that conversation last time I indicated to Yochi, we couldn't really go down to 5%, but we could kind of make some mathematical estimates to figure out what percentage of these customers fall into that group. Obviously 50% and above was very easy. Likely, low income customers who are in that zero to 25% FPL we figured out what percentage would fall in which group. Same for AMI. We didn't have it so it's harder to go granular on AMI versus SMI. I'd have to go back to the report to find out why exactly, I think it was the systems in which we had access to. Without running this program for a year, you know these are our best guess at this point until we have a year, or two of solid data to know how many customers we would expect in which tier they would fall on a consistent basis.

And I believe we provide that a few times and I even walked you through where some of these came from in previous meetings. But happy to do it again if people would like. We went back and looked kind of historically on average we have a little over 2000 applicants within our WEAF program. So 10% I'm calling kind of that first program year would probably be a good goal. Ultimately, the goal is to get to 100% of a realistic goal is 80%, At least that first program year, 10% seems like a nice goal to try to achieve.

Yochi - As you're talking about the enrollment goals, it makes me wonder if this is comparable. I mean, I know you're not in a whole year in Oregon but where were you at similar levels where you had 2% and do you think you might be getting to around 10% in in your first program you're there?

Chris - Yeah, we're actually getting close to 20% in our program year in Oregon. Our goal was around 4000, last I checked, we were over 3000 customers and we're only four or five months into the program year.

Yochi - Do you know what you were before in your assistance program in Oregon? Was it a similar level to the 2% that you are now in Washington?

Chris - No, it was much lower.

Lorena - Without some deeper thought around it I am thinking a lower FPL also with more of a discount because I'm worried that lumping some of the zero income folks or just really little income, that the 48% may not get them to a comfortable energy burden. That's just my initial leanings.

Chris - It sounds like everybody wants a little more time to play with this to get a sense of where they would feel comfortable.

Corey - One quick clarifying question, the tradeoff comes in the move to get to 2% energy burden other than the energy discount, not the arrearage discount would have to increase because of a lower tier for the arrearage management, is that correct?

Chris - Correct. And what that discount would be is depending on where we're trying to aim for that ultimate threshold. Like I said, I put 2% but you know, the utilities of that 6% energy burden, we're only 3%, maybe that's too much so maybe we want 2 ½. Part of my goal was generate discounts for their arrearage management, I wanted discounts that were equal or larger than we currently have, and then for the energy discount, make it so we get to 2% as an after energy burden while trying to maintain overall program costs to keep those low so. And you'll find out it's hard to juggle all three of those.

Yochi – So when we're looking at an average bill for a customer with that income in that income bracket, right?

Chris - Correct.

Yochi – Looking at people in that tier that are energy burdened and some that are not, and I feel like information we don't have is what is the average bill of someone who is energy burdened within that top tier versus one who is not. Is that right?

Chris - So are you're talking Tier 5? I mean overall this would be the average for all those customers in there. So some will obviously be lower and some would be higher, whether the ones who have

higher bills have lower income. That's hard to say at this point and would be more of a guess after you have the program in place for 3-5 years, then you could probably be able to answer those kind of questions and see if there's changes we would recommend doing at that point.

Yochi - The bill discount would be set at the same amount, whether a customer has arrears or does not have arrears, correct?

Chris – Yes. I'll take one more step back. The arrears, the way I looked at it was, this doesn't come into calculation within their energy burden because I figured this was past due amounts and energy burden is more about your current bills versus your income. And so, yes, this doesn't impact the energy discount. Energy discount is really other assistance, so LIHEAP is applied first, but for me to do it I did it kind of on this particular model, but energy discounts applied 1st and then other assistance. But it still gets you to that ultimate same goal. And so really this is what you would be looking at for these customers with their likely account balance or final bills would be and this is an annual number. All of this is annual numbers so you just divide these by 12 to see what their monthly amount would be.

Yochi - Got it. Thank you. That's very helpful to understand that the energy burden does not include the arrearage grants.

Chris – Adjustment made to 150% LIHEAP, tier 5.

Dan – Let's review the spreadsheet more in the next couple of weeks. Think about it more and it will be another primary topic in 2 weeks.

3. Collection of income and other data by company and agencies – Byron Pfordte

Byron- I guess to start we need to decide on what the goal is for collecting the information that we collect. This would be used for our data fields that would possibly be included in applications and follow up surveys as well, but joining this a little bit late in the game, I'm not entirely clear on the goals that we want to achieve by capturing this information from our customers.

Yochi - one of the primary goals in collecting data about customers that are served is to understand the customers that we are reaching in order to identify if there are customers that we are not reaching, where different or unique types of outreach would be appropriate.

Byron – Are you talking about connecting the dots with somebody filling this out. If somebody fills it out geographically, we can assume that somebody else around them falls into that same category. Is that what you're saying or?

Yochi - We see that we are not serving customers that have a particular demographic type. Then we can think about why we're not reaching those customers and how the program could be designed to reach them and particularly with the focus on equity, I think we want to be able to understand if we are reaching customers that might have a lower education or a particular ethnicity or race, for example, or in a multi generational household. And if we're not reaching those customers and our needs

assessments shows that those are customers who are in need, then we have the information in order to be able to see who we're serving and who we're not and how to how to adjust the program appropriately.

Byron - I have a hard time connecting the dots because these are people that we that are actively seeking assistance and then that's fine. I mean, understanding the people that apply, makes some sense, I don't know how it would be used for outreach for those not seeking assistance. You know, we're looking to outside help to help us identify those customers but for our applications and for our surveys. I do want to keep in mind the goal of what we want to accomplish with these customers and keeping in mind that every question we ask them is going to be a barrier to them applying. So, whether you agree with me or not on that, I do want to get that out there and hopefully that will be in your mind as we go through these data fields and decide what is and isn't necessary to collect from our customers. Right now, as we put this together, we still have on our side some processes to work out. We're exploring options for being able to collect this information and securely collect it. This isn't going to be a quick thing for us unfortunately, but having the pieces and what data we intend to collect is a first step for us in determining how we're going to secure this information. Hopefully everybody had a chance to look at this and I do appreciate any input you have. I'll first off start and ask if there's anything you saw on the table that I didn't include that you feel needs to be included and then we can kind of run through each of these.

Yochi - Before we move on, can we make space for other people to discuss how they anticipate such data being used? I would appreciate hearing some other voices as well.

Byron - Sure.

Lorena - I think one of the obvious ones for me, going back to what Yochi was saying is looking at the enrollment data over time. I think when we have fields such as race and ethnicity and language spoken, that is going to really be able to highlight where we need to do a better job of potentially reaching folks, education level I think is a piece of that as well. Just to try to find those gaps and services and this is the type of analysis that we do at our agency, and cross Community Action agencies is using these data fields to identify gaps and services to know where to focus resources. That's why we collect the data because we're required to by CSBG standards, but then we use that data in order to determine service gaps.

Misty - I was going to say the same thing you just said, but I can also see where some of this information would come in into play when we would be doing auditing of files or income verification of files. And verification of household members and things like that.

Byron - If you do that, then I mean you have to collect that information first hand yourself anyways, correct?

Misty - Correct. But when we are going at that blind we would just get a name won't have anything from the client up front stating what it was that they were telling you guys when they signed up for the program. So there's no way to kind of use that as a guide of what we need to be asking for or even to be able to dig further. It's just helpful to have it from the client then it is to go in blind when you're trying to get that information from someone.

Lorena - I would say an example of that is including things like employment status, disability status, but status that can also help us determine whether there's likely income related to those different composition check boxes.

Yochi - And then I just want to expand on one other thing that we that that was mentioned briefly and that's just that Community Action agencies rely on federal grants for funding and that federal funding requires them to submit this data for customers served. And so, that is one among many reasons why it's good to collect this data as well, and that's not to say that Cascade has to keep all of that data if they don't want to or don't feel comfortable keeping that data.

Byron - So that is one part of the security aspect of it is, you know, not storing this data for a prolonged period of time. And I know RIT Group has no intention of us storing this data for any longer than needed.

Andrew - This is Andrew Roberts with the Commission staff. We had a similar conversation with Avista. The information list was a little bit different, but ultimately, they ended up moving away from some of the information because their system didn't store data to HIPAA standards. So I think that's probably a consideration, I don't know if anything here would trigger that I think I have a bit of a concern with information that's not required for the program or other requirements.

Byron – That is the gray area because for our purposes, I'm aware we're relying on the customer to self-attest to FPL or AMI percentage or even provide their household income, beyond that, to qualify for our programs, we really don't need much more information. And so from the utility side of it, very little of this is needed. I did go to some government sites on best practices, and it said what Andrew said. There is no need to collect anything beyond what is needed and so that's what I'm struggling with from the utility side, as I said, it's very little that we need.

Sylvia - I missed the first meeting so I'm not sure if I'm speaking out of line, but I'm looking at those three bullet points where it says general agreement among the group.

On the following, which was what you just talked about, self-attestation, post qualification verification process and all that. So as far as that goes, I mean I'm not sure why we're trying to make work harder for ourselves at the CAP agencies. And then we already have that other information as far as all those data fields to consider when we're helping somebody with LIHEAP and WEAFF, we're gathering that information already. I'm thinking that we've got that information, so it's not going to be something difficult.

Misty - So I'm looking at it from the aspect of, we need this information for the clients that we currently see with LIHEAP and all of that. But what about all of the people that are going to apply for this program who have never received assistance from Community actions before, because they can now we're trying to get them in touch with community actions, who they can get services from, but we don't have any information on these people at all. My point of when you're verifying information instead of going in blind, you have information on a person that you can talk to them that they've filled out the information.

Sylvia - But if the vendor is telling us that this is all right with them, then I mean, if they've already had this discussion with Cascade gas over the phone or however it's going to be, maybe that information can be forwarded to us. If that's what all they require, then why are we making it harder for us, whether

they've been for help or not, they've already discussed this with Cascade natural gas. Why is it for us to go digging more even further into somebody's income or whatever it is or just trying to get a discount on their bill? That's just my opinion, it seems like it's just a discount that whether they've been here or not, they're asking for a discount.

Misty - Right. And is it Cascade natural gases plan or is the plan to allow anybody to get on the rate discount program no matter what they self-attest. Or, are we looking at a verification process to make sure that they do qualify for this program?

Byron - That's what the audit is for the 3% and yeah. So they attest, whatever they say they make when they call is what we qualify them at.

Misty - And then there's supposed to be an audit process with so many files or whatever, or however many whatever that's decided upon type of thing and then if they are found to be over income at that point...

Byron - Then they're removed from the program, but I think we agreed they are removed without having to pay back anything.

Misty - Right. So the information that they're gathering is just helpful in that audit process. That's my way of thinking about it.

Byron - From Cascades side of it, you know our stance is we don't want to collect anything. We don't need for our purposes and in that audit process you're going to have to collect this information from the customer anyway.

Misty - There are some things on there that I agree could be off, but I think there are some really important things on there as well.

Byron - OK. We'll start with you if you want to just kind of point out what you think is definitely needed, that would be of great interest to me. And I'm assuming the group as well.

Misty - So from my agency standpoint, having to do an audit on a file or on a an application, obviously I would say that the applicant, the secondary applicant, the residence address and mailing address, what language they speak in the home, because that's going to give us whether or not I need to have a translator or somebody who can speak their language, call them. Employment status? That's going to tell me they have earned income in the home, I am going to be asking for specific types of income, number of people in the household and an e-mail because you know you're going to want multiple ways that you can contact the person. Obviously the account number so we know what account we're dealing with, the housing type, if that is something that determines a benefit, additional income and sources there. So whether or not a person is on Social Security or unemployment or whatever their income may be, any questions regarding income would be important for us. And then whether they received any other assistance because that could possibly look to whether or not you even have to do an audit on them.

Byron - And for these, I think we said if the customers qualified for LIHEAP and then gets the energy discount, they would be excluded from that audit. I believe that's what we said.

Misty - There's other assistances out there maybe, such as if a person receives food stamps. Then we couldn't potentially qualify them because they've already been income eligible through another social service agency.

Byron - Are there fields here that we just highlighted that you're going to have to ask anyway. I mean, are these helpful to know ahead of time.

Misty - Probably not. I mean, we're going to obviously have to interview the client as well, but having some information ahead of time, the housing status is not necessary.

Byron- That's what I want to accomplish - what information is necessary for us to gather and pass along so if there's any of these that aren't necessary.

Misty - I would say you would probably want to do the household composition though that's necessary so you know how many people are in the house. And who were supposed to be talking to them about?

Byron - Wouldn't that be covered under primary or secondary applicant? Who you're talking about?

Misty - Well, not necessarily, because you have children in the home that, when you have a household of six, you are going to want more than two adults in the house. And are you counting all their income? I would say the phone number.

Byron - I don't know why, but looking at the LIHEAP application, gender was the only demographic data field that was required. I'm not sure why that is, but I found that interesting.

Misty - Lorena, do you know why that's required on LIHEAP? I know it has something to do with the statistics and stuff like that.

Lorena - Yeah, it's required because they're trying to look at how many women head of household, that kind of thing to determine who is getting these services at their federal level. And to that point, I really feel strongly that race and ethnicity should be included and it in it. And just like on LIHEAP and all our other programs, it is a voluntary question, but I really feel strongly that if we don't know who is accessing these programs, we don't know who's missing out on these programs. And that just feels like a loss. So I do feel really strongly about that one and it being a voluntary field like it is in in most data collection, you know situations - the education level, the things related to the household composition like disabled veteran status, though those are also voluntary fields in LIHEAP. Those are not required fields. The required are, first name, last name, date of birth, gender. And then a lot of these are voluntary, not so much the things when we talk about the household type, the housing status - those are household level characteristics rather than individual characteristics. But we're talking about individual characteristics. Much of it is voluntary. And I would propose that they'd be voluntary. And in this application as well.

Byron - I've heard a couple times that we want to be able to use this information to pinpoint underserved and those that aren't served. But that's also the goal of our propensity studies. And so I don't want to forget that that we have other methods for reaching these underserved without creating more of a barrier to those who are seeking assistance.

Misty - I agree with what Lorena said, but I also want to bring this up - are we trying to collect this information on every single person who's in the program, or are we trying to collect this documentation because agencies need it for the people that they're going to be auditing?

Lorena - I am more specifically talking about it as the utility side of the program side being able to say who is and who isn't getting it. I realized that, going back to what you were saying and what Sylvia was saying, for those that do end up coming to the agency, whether it's via the eligibility verification or audit or because they've been referred for arrearage management, we do have mechanisms to collect this data and likely will. But it is easier if it's already on the application that we're required to use. And I feel like to a certain degree we'll be developing that application as for both the amp and for the BDR as part of this because you guys have been reliant on basically agencies create using the LIHEAP HIF agencies using whatever it's not standardized, or if it is it's standardized across lie, cheat, and so I think we're kind of moving away from that is that it's going to have its own application. But going back to what you asked, Misty - I'm thinking about it from the utility standpoint of who is getting served and do agree with you as far as thinking about it from the audit standpoint, where maybe race and ethnicity isn't as important for that standpoint. But some of the other fields are very helpful for when we're cold calling people or cold emailing people who've never worked with our agency before.

Byron - I'm going to highlight this because for our purposes, this is what we require.

Yochi - I will echo what Lorena said. You know, we think that these fields should be voluntary, but that it's important to collect the data. But I think having actual data from customers that are enrolled would be a good additional data point. Having Cascade collect this data also allows us to understand which types of customers are served by Cascade or which type of customers come to cascade to get enrolled in the program and which types of customers come to the agencies to get enrolled in the program? And I think this is going to be valuable information as well. I didn't see on this list, but I thought might be worth collecting, which would be a citizenship status. Need to understand if we are serving non-citizens.

Byron- I'm pretty sure that's a field we don't want to collect. And I mean we can talk about that a little bit more, but I mean for our services and at fear of alienating our customers, I don't think that the utility has any business collecting that information because it brings up all sorts of concerns about when infrastructure projects happen, are we targeting certain territories or group based on citizenship or, we could even do that based on low income or high income areas, you know it's a can of worms that I mean we really don't want to open up.

Lori - Byron, just to tag onto that, I think, there is some legal issues for us potentially, with having to turn that information over and that just opens up a whole set of legal issues that we don't necessarily want to be part of.

Misty - I have a question and forgive me for not knowing this answer, but if these are ratepayers essentially paying for this this program, wouldn't some of this information need to be collected so that in the future, if there were ever any concerns or programs needing to change, we had information to go back and argue points or anything like that. I mean, in rate cases, I would imagine that at some point this program could get large with the amount of people and it's going to cost the rate players more money. And at some point, do you think that they're going to come back and say enough is enough?

Byron- Yeah, I do.

Misty - And then when we need to have information that proves of the people that we're serving.

Byron- I mean we would point to the income data, which is really all we need to say that you know we're reaching the people that these programs are designed to reach. Are arrearages going down, speaking hypothetically, this is what we want to happen. Our past due accounts are down and we're seeing customers paying their bills on time. But in rate cases and lawyer, Chris can correct me, they're not asking for ethnicity of who we're serving or they're Citizenship or any of that?

Corey - Speaking from my experience working on several rate cases across utilities that concern hasn't really come up about knowing who we serve and Byron's point about gathering information about income and knowing that they're serving in customers based on income. In relation to arrearages, that is something that eventually rate payers would have to pay for anyway through uncollectible that would be included in rights as well. So that's something to think about, relative to the other components of build rates. And even as this program grow, the amount collected from each customer is very small compared to the other components of a bill. And I think customers would be more concerned about the company. For example, requesting too much money to cover various investments - that sort of thing is going to be a much bigger part of the bill.

Byron - Any other comments? We are quickly running out of time and we still have to get to a couple more pieces here. I will save this. As I said, I mean we are still several, several steps away from being able to collect this information securely anyways. But for those working on methods of securely collecting this they are interested in what we want to collect. So there is a little bit of urgency and making sure that I'm able to get these data fields to them. But at the same time, I don't want to exclude or include anything that that isn't needed, and I think this is a good starting point for me to share with that team.

Yoshi - Before we move on, if I could just say, I feel like it was pretty ad hoc as you were going through and highlighting those data fields and before the conversation is finished, I think it would be good to go through and kind of more comprehensively discuss each one that you know that, that that hasn't been highlighted. So that group members can express their preference and explain how it may or may not be used?

Byron- Yeah, I'm not setting anything in stone right now, and I do need to be respectful of everybody's time. We can talk about this, and we can set that for our next meeting as another topic.

- Data Fields to Consider (compiled from LIHEAP, PSE, Avista, and CNGC applications)

Primary Applicant Name	Secondary Applicant Name	Residence Address	Mailing Address
Marital Status	Language Spoken in Home	Ethnicity/Race	Employment Status
Phone (primary)	Gender	Date of Birth	Number of people in Household
Email	Account Number	Housing type	Time at Residence
Education Level	Household composition (ages, gender, employment status, disabled, vet, etc.)	Housing Status (own, rent, etc.)	FPL, SMI, AMI, HHI

Average Monthly/Annual Energy Costs	Additional Income Sources	Energy Type	Do you currently have a payment arrangement?
Have you applied for/received assistance in the last 12/24 months?			

4. Set key topic(s) for 2/15/23 full Advisory Group meeting – Byron Pfordte

Discuss CBO Program structure

5. Set key topic(s) for next meeting – Byron Pfordte

Customer Data Collection

Tier Structure

List of program design topics agreed to by group:

- Arrearage Management and Rate Discount Design
 - Design of income-based tiers
- Joint administration between utilities and community action agencies (CAA)
 - Ensuring utility-enrolled customers can access other services, including LIHEAP, weatherization, childcare, rental, banking, water assistance, etc.
 - Tracking number of customers enrolled by utilities that proceed to CAA intake.
 - Information sharing, i.e., individual customer demographics provided to CAAs.
- Enrollment
 - Self-attestation of income/HH size
 - Audits for verification
 - Type of income, length of enrollment, processing changes in income, time to provide documentation, selecting customers for audit, etc.
 - Use of categorical eligibility to either very incomes or enroll customers.
- Utility and CAA design a joint communication plan documenting:
 - Program launch, informing customers they are selected for audit, informing customers they are not income-qualified, and responding to media inquiries about eligibility and fraud.
- Managing overlap between LIHEAP and bill discount program; developing a plan to maximize use of federal funding.
- Reporting