

WEAF Advisory Group

Agenda

April 5, 2023

KEY TOPICS: Bill discount rate percentages, post-qualification verification process, income collection as part of qualification process

GOALS FOR MEETING OUTCOME: Finalize bill discount rate percentages, outline post-qualification verification process

1. Bill discount rate percentages – Chris Mickelson

Tillis, Daniel

Let's start with number one and I can share this with Yochi separately or you can get it from the recording or the minutes. We have a couple of personnel changes, one within the company and one with one of the agencies. Byron Pfordte, who was a member of my team and was Shannon's manager, has accepted an opportunity outside of the company, his last day is tomorrow. At this time, we're not going to backfill his position. For now, Shannon will report to Teri Sovak, who is on the meeting with us this time, and going forward, she'll be invited. Teri is our Manager of Credit and Collections and has been very involved in all of the Energy Assistance Program discussions internally that we have and is very knowledgeable on Washington programs, as they exist today. She has been involved in a lot of the conversations we've had with IT on options of creating a traditional AMP and also how we can utilize LIHEAP funds first, before utilizing ratepayer funds so she's in the loop on a lot of what we've discussed. I thought it was a natural fit for right now for Shannon to report to Teri because everything we do related to energy assistance impacts the disconnect process and the collections process, bad debt for the company, write offs that impact our ratepayers, etc. Frank Martinez has joined. Do you want to introduce yourself?

Frank Martinez

My name is Frank Martinez, and beginning this week, I am the Associate Director here for this division.

Tillis, Daniel

Welcome Frank and Teri. It looks like Yochi has joined us, so I think we can just dive right into #2. Yochi, we got your e-mail and had a quick internal discussion earlier today. Chris is going to take us through the bill discount rate changes or percentages and your feedback on the on Tier 1.

Mickelson, Christopher

Yochi, within your proposal you wanted to increase Tier 1 to 20% and keep the discount at 97%, that was not what was described within your original proposal, which you can actually see about 2/3 of the way down from the e-mail you sent last night. The overall arching goal has always been the energy burden as we've discussed at somewhere between 4 to 3% is Cascades portion of the overall

energy burden, so that's what we've always been trying to target. I know at 97 it takes a that Tier 1 below 0.9% energy burden, so thus almost putting all of that energy burden on Cascade customers, which doesn't seem appropriate. As so with that information, does that change your thinking or are you still trying to readjust the Tier 1 discount?

Yochi Zakai – Screen froze, coming back on

Charlee Thompson

Maybe while we're waiting, I can share a little bit about a recent conversation with Puget Sound Energy, which was similar to this one because they also started with the first tier being with the highest discount percentage 0 to 5% range. With a higher discount expanding to 0 to 20%, because the effect it zero to 5% versus 0 to 20% of income or federal poverty level, that income represents is still effectively 0 or is incredibly low no matter the county or the area that it's in so we decided, with PSE, to increase that first Tier to 0 to 20%, which was fine and also maintain a higher discount percentage. I think that's where this conversation is stemming from, US advocates and agencies who have been involved in those other conversations and trying to kind of get alignment there to hopefully pass that benefit for the first tier to a larger group of people who are who have the same income challenges, whether they're at 20% or 5%.

Mickelson, Christopher

So the 5% and the extremely high discount obviously originates with Avista because that's what their program was designed at. And that makes sense because at 5% the income really is basically close to zero, so you need a much larger discount to effectively move that energy burden. And so yes, as we adjust those tiers to a higher threshold, in this case 20% FPL, then the discount doesn't need to be as much since while still 20% FPL is a very low income, on an energy burden basis, it's obviously, like four times greater than that of someone who had a 5% FPL. Dan and I have talked, and we could do up to 90% of a discount, which would put the Tier One at a 3% energy burden, that's still at least justified. In essence, we would be saying natural gas is half of the energy burden which isn't really the case, but we could at least live with that. But going something less than one doesn't make sense at all, and I would have a hard time advocating for that in front of the Commission, let alone the added cost that would be layered on to Cascade customers.

Charlee Thompson

Yeah, that makes sense, Chris.

Yochi Zakai

Sorry about that, I lost all my Internet. I don't know what's going on but thank you for that explanation and I'm curious to hear what people think about setting it at 90%. I feel like that's something that I'm open to exploring if other folks in the agencies are supportive of setting the first tier at that level.

Tillis, Daniel

Chris, can you make the change to 90 just to show the energy burden decrease? Right now, it would be Tier 1-90%, Tier 2-71%. Tier 40%, Tier 4-15% and Tier 5-8%. Does anyone have any objections to starting the first program year of the energy Rate Discount program at those levels? Charlee has no objections.

Yochi Zakai

And I also want to acknowledge that if someone wants to take time to think about that, we should probably make space for it.

Lorena Shah

I'm comfortable with that for a year one and just like all the little pieces where we're going to take a look at this after some time has gone by for a year or two just to ensure that we are keeping people around 3%. I'm comfortable with 90% in Tier 1.

Tillis, Daniel

Great. In addition to whether or not you have objections, if anybody wants time to think about it obviously, we want to make this decision pretty quickly here so that we can give the data to our IT team to start working on this aspect of it.

Corey Dahl (PCU-he/him) (Guest)

I echo the sentiments of everyone. I think that looks fine and acceptable for year one and just reiterate comments that it will be important to have another bite at the apple for to assess what's working here and what isn't with specific relation to the discounts and even perhaps if the tiers are set at the right income levels.

Tillis, Daniel

Great.

Mickelson, Christopher
Commission staff.

Moline, Heather (UTC)

Nothing to add. Thank you.

Tillis, Daniel

OK. Well, I think we have consensus on our five tiers. The ranges within those tiers and the discount level.

2. Post-Qualification Verification process, starting with explanation of sample – Chris Mickelson

Mickelson, Christopher

Woo Hoo! The next item Yochi was asking about the audit piece. This was more of an information that the agencies were wanting to get a sense of how many audits they would possibly be looking at within a program year. What we created was, based off the county and the number of customers of within those counties that are possibly low income, we figured out what percent of those customers would likely be self-certified, and that information is based off what we're seeing in Oregon. So, that percentage is 17%. It's a number you can adjust accordingly. You can make it 20, 15, but it's probably somewhere around there in all likelihood. And then the 5% which is being reflected right now is kind of the condition that we've been talking about whether we audit up to 3% or audit up to 5% of those customers. And so, you kind of got a sense of roughly how many you're looking at for each county and possible audits within those counties. So Yochi this more for you, is that sufficient enough or do you truly need a write up of that?

Yochi Zakai

No, that's good. The 17% was the self-attestation rate seems low to me, but if that's what you're seeing elsewhere, then that's a good to know where that assumption came from.

Mickelson, Christopher

That's what we're seeing in Oregon right now. Of course, we're only six months into the program year and so obviously after a full year, that number could go higher or lower depending on the overall number of customers who enroll.

Misty Velasquez Community Action of Skagit (Guest)

This is misty. I was just curious if there's any way to determine based off of how many people in our area are getting WEAFF currently, how many come to us for WEAFF. And because I am going to assume that all the people that we serve for WEAFF, they're going to sign up for this program once they learn about it.

Mickelson, Christopher

If you go to the assistant tab, the fourth column indicates the number of WEAFF applicants, while the third column shows the number of total company customers within those counties. And if you go seventh column, you'll see who the LIHEAP customers are.

Misty Velasquez Community Action of Skagit (Guest)

Right. I guess I'm just curious how I could figure that out on my own, how would that equate to the 17% that Oregon is showing right now.

Tillis, Daniel

Hey, Chris, I had a thought and I just put it in the chat to you, that 17%, does that include the customers we initially auto enrolled based on prior energy assistance having been received or is that 17% only the customers who have enrolled through self-attestation outside of that group of auto enrolled customers.

Mickelson, Christopher

Yeah, this 17% is only those who actually self-certify, not any auto enrollment or customers who received energy efficiency in the last 12 months.

Tillis, Daniel

OK. So those customers who we auto enrolled on or about October 1 of 2022 are not in your denominator?

Mickelson, Christopher

The numerator, I think, but yes.

Tillis, Daniel

Well, no, it'd be it'd be denominator because these are rough numbers. So, we auto enrolled about 2500 Oregon customers and those were not through self-attestation, so they should not be in the calculation, in the denominator to determine how many self-attested going through the normal qualification process, either through the company directly or through the agency, right? I'm sorry, I should have thought of this question earlier when we met.

Mickelson, Christopher

So in that instance, no, because basically we've had about 600 customers or 550 customers who self-certified out of 3300 customers. You take that 550 over the 3300, that should be right around 17%. Of that 3300, 2500 we went back and automatically signed up because they have received WEAF or LIHEAP in the last 12 months, they would have been included in the denominator.

Tillis, Daniel

But they really should be able to get to that number who are self-attesting, who potentially would need to be in the pool to be randomly selected for the post qualification verification process, right?

Mickelson, Christopher

Really all your're saying is out of the 500 customers we're going to take Oregon as an example, of the 500 and say 50 customers that have self-certify 5% of that group we will audit.

Tillis, Daniel

And then you have to take that and try to extrapolate that to Washington customer base size, so to Yochi's point earlier of being surprised by the 17%, I think that number is that low because it includes the customers we auto enrolled in the calculation in the denominator. And so, it's actually skewing the percent who have enrolled via self-attestation since October 1, either going through the company or an Oregon agency.

Yochi Zakai

Thank you. That makes sense. I would agree that we don't need to have what we prefer to call a verification process as a that's just a term that's used elsewhere in energy assistance and low-income programming. I would just encourage us to switch the terminology to verification or income verification. I think for auto enrolled customers, income verification should not be necessary because they had their income verified within the past 12 months when they originally enrolled in WEAF.

Tillis, Daniel

Agree. If a customer qualifies for an AMP, LIHEAP, or winter help through income verification, they would not be subject to post qualification verification income verification. We will want to have a process where we receive that income, data, and household FPL AMI data so that we can enroll them in the correct tier, which I think the portal will be our source for that. The pool will only be those who verify through self-attestation.

Yochi Zakai

Would Cascade have some of that income data from folks that enroll in this program year or is that something that the agencies would have to provide? Or is it kind of a mix of the two?

Tillis, Daniel

The agencies send us FPL and I think AMI through the portal, Shannon keep me straight. For any customer they qualify we should have that, I think. I'll ask a question that I should maybe know the answer to, but are the agencies the only organizations that qualify customers for LIHEAP in the state of Washington? I ask that question because in Oregon, for sure, and I'm not sure about Washington, sometimes we get a just a pledge that comes or a check that just arrives into our accounting team from the state that is to be applied to a customer's account, and those customers we've been

enrolling them just at the lowest Tier 4 level, Oregon only has 4 tiers. We've just recently gotten our hands on that OHCS data after we finalized our data sharing agreement where we now get household size and income. So, we can calculate FPL and SMI. In the case of Oregon for those customers, we get them into the right tier, there are times when customers would qualify for LIHEAP and we're not getting the FPL AMI, then we have to figure out a way to get that. Anybody have any insight on how that's working in Washington? Shannon or any of the agencies?

Steed, Shannon

Right now I do get the FPL information from the agencies when they submit pledges or AMI, if they should qualify customer that way. I do recall receiving very occasional LIHEAP pledges from, I believe it's DSHS in Washington, they're not very often, but I do believe I get those from Washington. But as far as actual income in dollars, we don't retain any of that and we don't get that from the agencies.

Tillis, Daniel

But we get the FPL or AMI that we need?

Steed, Shannon

We do.

Misty Velasquez Community Action of Skagit (Guest)

I can say that with the FPL it comes from the calculation form that we do when we are calculating the benefit. That's how we determine what the FPL is to give you guys. So, if we're not determining benefits for these clients, we wouldn't have a way of determining that FPL for you. If we're not doing WEAf, how are we determining a benefit if our LIHEAP calculator does not determine the FPL.

Tillis, Daniel

The arrearage management arrearage forgiveness you would. I think the plan is you will calculate that as well as the LIHEAP.

Misty Velasquez Community Action of Skagit (Guest)

Yes, but our LIHEAP doesn't calculate an FPL.

Tillis, Daniel

How does it calculate?

Misty Velasquez Community Action of Skagit (Guest)

We don't. It doesn't tell us what the FPL is, it just calculates a benefit. The only calculator of ours that calculates an FPL is the WEAf calculator.

Lorena Shah

Am I correct though that CNG will provide us with both a BDR and an arrearage management plan type calculator of some sort?

Tillis, Daniel

Correct, yes.

Lorena Shah

It'll just replace the WEAf one. OK.

Misty Velasquez Community Action of Skagit (Guest)

But what if clients don't have AMP, what if they are not behind in anything and they're just calling to apply for it?

Lorena Shah

Then there'll be a calculator for the BDR.

Tillis, Daniel

Right for the bill discount rate, right?

Misty Velasquez Community Action of Skagit (Guest)

OK. But you're talking about needing the FPL for the people who you're just automatically going to enroll.

Tillis, Daniel

Well, we'll auto.

Lorena Shah

Which are people that we saw this year.

Misty Velasquez Community Action of Skagit (Guest)

So we're going to go off of this year's FPL and not their current at that time, is that how we're planning on doing that?

Tillis, Daniel

Yes, and we'll send all of those customers a letter and or e-mail letting them know that they qualified in the discount level and to contact the company if they feel like they might qualify at a different level.

Misty Velasquez Community Action of Skagit (Guest)

So then maybe the easiest way would be for you guys to send us a list of everyone and then we go into our records and just fill in that spreadsheet and send it back to you.

Tillis, Daniel

Well, we should be able to pull it from our portal since you've already submitted that in in the portal, right?

Misty Velasquez Community Action of Skagit (Guest)

True, for WEAFF. If they only got LIHEAP, no, which isn't likely.

Tillis, Daniel

OK, if they got winter help, we should have it in our portal.

Misty Velasquez Community Action of Skagit (Guest)

Yes.

Tillis, Daniel

But if they got LIHEAP, you don't enter those into the portal.

Misty Velasquez Community Action of Skagit (Guest)

I don't believe so.

Tillis, Daniel

Do you enter the pledge into the portal and just not the FPL AMI? I think in that case I think you're right, I think we can pull those LIHEAP only pledges out of our portal and send them to each agency to ask you to pull their records and calculate FPL or AMI would have been on the income and household data you have using and send that back to us.

Lorena Shah

Yeah. I just wanted to say I think that'll work just fine. I think the reverse is more true that there's more people that get WEAFF. When I was looking at our numbers on the assistance tab, we had five more people that got WEAFF that didn't get LIHEAP. So, I think it's going to be such a small list, if any, that you need to send out that got LIHEAP and not WEAFF. I think the agencies will be able to go back and use a calculator to hand calculate it, it just should be so minimal. We're the biggest agency. I just don't see it being a big burden.

Misty Velasquez Community Action of Skagit (Guest)

I don't think it's going to be a burden. I was just curious of how I was going to work through it. Yeah, I don't believe we served that many more people who get LIHEAP and not WEAFF.

Sylvia Schaeffer

Here at Blue Mountain Action Council we have our database that we keep track of all our services through Cap 60, that's where we pull our FPL off of for any other information that's needed when we submit our pledges for LIHEAP on the portal. We pull them off of that because it does give us that information, so it's not going to be an issue for us for sure.

Tillis, Daniel

OK, great. Thank you, I think we that it was a good discussion. We really worked through our auto enrollment process there. We could enroll them at the Tier 4, Yochi if we don't have the income information, we know that their FPL is no higher than 150% yeah good point. We'll pull all WEAFF and winter help data out of our portal instead of our CC&B system, which is what we did and Oregon, it does not have income data or FPL or AMI and we'll utilize that to auto enroll those customers into the correct tier and then send the agencies a list of any LIHEAP only pledges we received from October 1, 2022 through September 30th, 2023. We will ask the agencies to Calculate FPL and AMI for those customers using the new calculator rule and send that back to us and we'll get those customers either auto enrolled into the correct tier. If we don't have the data at all, we'll auto enroll them into Tier 4 level discount which we agree to a 15%.

Charlee Thompson

Yeah, that sounds good to me.

3. Income collection as part of Bill discount qualification process (if time permits) – CAAs

Mickelson, Christopher

I am not as familiar with the verification process, but more than happy to take suggestions. And like Dan said, he'll kind of review the minutes later. I would just say any questions that are outstanding we will hopefully have answers next week.

Charlee Thompson

I can walk through the rest of this verification. We talked about everything on what's being displayed right now on this first slide from Avista. The main two things that we need to talk about was what to do with nonrespondents and then how many communication touch points are for the customers when they go through the utility versus the agency. The purpose of the 90-day window is to communicate to customers that they have this allotted time to respond to the request for verification to contact their agency. If they need to change that, they have time to do that. We decided if it was after that 90-day window, it's not an immediate removal from the program or removal of benefit. It will be after one more month, so on 120th day or 121st Day is the point in which the benefit actually stops. That originated from discussion surrounding data and stats from California programs; most people that are removed from non-response to verification still qualify for the program and the benefits. So, this was our determined way to keep that benefit there for as long as possible and keep that opportunity to respond to verification there for as long as possible.

Mickelson, Christopher

Quick question, and I'm just curious from my standpoint, so for 4 months, the person can basically keep receiving a benefit? Are these particular customers held harmless or how's that handled? Do these customers have to pay back any of those benefits they received or are they held harmless?

Charlee Thompson

No, they don't. They definitely don't have to pay back any benefit that they receive. In this way they are I guess held harmless but there are subsequent bullets, other measures that are trying to act as safety backdrops for the customers, but to hopefully incentivize or get customers to respond within the 90 day timeline. I can walk through those and that might give a more holistic picture and you all of course can read along.

The second bullet came out of a lot of discussion, and I think everyone in the Avista BDR subcommittee is happy with how this landed. This is to incentivize customers to respond within the 90-day window. If the customer does not respond they aren't incentivized to get back with the program to reenroll by receiving any credits for those three months up to three months that they did not respond. If they were off the program like on the 4th month or on the 5th month away from their notice to come in for verification, they reach out to their cap agency or the utility and ask to get back on this program due to circumstances. They can be credited for up to three months, three additional months that they missed. It's more incentive to get back in and call their agency and get back on the program as soon as possible. The third bullet - we had some agencies in the subcommittee say well maybe we can take this 90 day window, if we have information from LIHEAP or other programs, if we information, or the customer comes in later and has some sort of income based data that can be used to verify their income for the BDR, then the agency has the discretion to take that opportunity to try and verify the customer themselves, even if the customer does not come in. What is still being discussed at Avista is this sub bullet or I guess the second dash under the third bullet. How can we handle particularly medically friend style customers who might have data somewhere that can help them stay on the program if they don't reach out. Or are there any other backstops we want to provide for medically fragile customers such as do we give them a longer term of length of enrollment in the program? Do we give them extra time to respond to request etc. Details on the medically fragile customers are still being discussed, but this idea that agencies have discretion to verify customers if they can, if the customer is not reaching out, is available. The last

thing that I certainly want to know here is this last bullet on the page, which I think we talked about last time we met; the two-year term for enrollment or whatever length of time we decide on for the program is going to start. For customers who are verified it will restart at that date of verification because they have come in and because they're income is enrolled now, they get the benefit again of having their length start from there, so that was another incentive for having people come in within the 90 day window if they can.

Mickelson, Christopher

I'll get back to the held harmless in that for touch points, how many are there actually? Is there six?

Charlee Thompson

Yes.

Mickelson, Christopher

So there's actually six different touch points. Wow. OK, that's that seems like quite a few.

Charlee Thompson

Yes, I think this came up with PSE, too. But two of those touch points are from the utility, and that's the first one being a letter from the utility saying you've been randomly selected for verification. Here's the process and here's the information for your cap agency, please reach out, here's the timeline, etc. The 2nd letter from utility is notifying customers of removal from the program and again contact your agency to get back onto the program. The four touch points in between those two letters at the beginning and end from the utility, at least for Avista, was discussed to be coming from the agency. Three were notices, whether it's e-mail or phone call or whatever, that preferred communication method is within the 90 day period saying respond to this request so we can continue your enrollment on the program, here are some documents you can provide or whatever that might be that communication is still has to be figured out whether this stuff. The 4th communication from the agency after those notices to respond is the final, please respond before you're removed, before receiving the letter from the utility that they have been removed. I think six sounds like a lot, but it is spread out over the 100–120-day period where five of those communications are happening during the 90 days informing the customer that they've been selected and informing them to please respond

Misty Velasquez Community Action of Skagit (Guest)

So is the very first touch point from Cascade natural gas and they're informing the client to get in touch with the agency at that point in the customer doesn't reply, the agency reaches out? The agency isn't going to reach out to them. Is that what I'm gathering from this because I can see some concerns with waiting for customers to contact us if that's the route that this is going to go, or if that's what we're talking about.

Charlee Thompson

The diagram or the setup for the timeline from Avista on second page, blue arrows outlining that. Initially, the utility is going to say you've been selected for verification and then it's basically the CAP agencies are going to notify three times in the preferred communication method.

Misty Velasquez Community Action of Skagit (Guest)

The reason I see a concern with Cascade natural gas sending out a letter to the people is because, and I don't know about everyone, but when I get letters in the mail from things, I just throw them aside. I don't look at my mail but every six weeks because all of my bills I pay online. So, if something's going in the mail to a client, I can just see it being thrown away, especially with clients who have issues paying bills or things like that, they tend to ignore things that maybe are very important.

Charlee Thompson

That's a good concern. So maybe that's a discussion as who does the initial and final letter come from the utility, does it come to the agency, does that add more work to the agency, etc.?

Lorena Shah

I think it needs to be from the utility, as Dan mentioned earlier, a letter for those that have not opted into e-mail or that is their preferred will make some assumption they're reading their mail. But I hear you, Misty. So hopefully for those that have opted into e-mail or where we collect that e-mail is the preferred over mail then then they would get an e-mail. I do think however though once that communication goes out that there are going to be a handful of people or more than a handful of that are really skeptical as to why this agency is contacting them because they won't have read their e-mail and they won't have read their letter. I think it would be probably pretty handy for the agencies also to have copies of that letter so that we can squall people's fear of us being a scam. We'll have those letters available, and we can encourage all of this, I think is kind of part of that more detailed planning. We can encourage them to call CNG and verify this information and whatever that conversation looks like

Misty Velasquez Community Action of Skagit (Guest)

I agree with what you're saying, Lorena, but I also think that maybe that first touch should be the letter from Cascade Natural gas of contact, but it shouldn't be counted as one of their six contacts. If we are the ones doing the verification, we need to be contacting the client because they're not going to call us.

Lorena Shah

That's how I envision it too, is that that the letter goes out or e-mail goes out to client. We wait a normal amount of mail time and then we're picking up the phone, we're sending emails, we're sending letters, whatever that customers preference is to get them in. I would not wait on a customer to call us personally. Then we're going to try those three times, if there is no response, we do that final letter. And I guess one thing we have to determine is that letter saying you didn't respond and we're now passing you back over to the utility or is that letter you have five days to respond? There's probably a little bit of work to do in the three or four contacts, exactly what those are going to look like, but my agency is going to be proactively trying to reach these folks to wrap it up.

Corey Dahl (PCU-he/him) (Guest)

I don't have anything to add, Lorena. You touched on the point that I mentioned earlier, being mindful of the preferred method of contact and aiming to make communication via that way, particularly from the utility. The other thing that I think would be helpful and I believe the agencies would keep this information, as just keeping a record of, how customers were ultimately reached or

how they responded to the request for verification and after how many contacts? I think that's going to be really good information to have.

Mickelson, Christopher

So going back to the burn 20 days, that seems like very long time to receive benefits. I have to balance the position of helping these customers while also being good stewards to all of the other customers, money. For what 1/3 of the year seems like a long time to be able to verify, just something to consider

Misty Velasquez Community Action of Skagit (Guest)

I'm wondering if the 90 day is because by the time we get done with our 90 days trying to get in touch with the client, getting the rest of that information to you might be past that 90 days and then they're in the fourth month already receiving some kind of benefit for that fourth month. I think that's where that came from it.

Charlee Thompson

I was going to add that it's like the back facing or back-end window that 120 day isn't advertised to customers who are enrolling program. They will be told they have 90 days to complete the verification and then 120 days is what the timeline of this does working on from start to finish on sending the first notice and then officially removing them from receiving benefits.

Corey Dahl (PCU-he/him) (Guest)

There will also be some lag time in when the information is sent over or gathered, and that the next billing cycle occurs anyway so I think that's part of the issue there too.

Mickelson, Christopher

So up to 120 days, but 90s kind of the minimum, and disconnect or termination from the program can happen anytime between 90 and 120.

Corey Dahl (PCU-he/him) (Guest)

Yeah, ultimately Avista's, yes. The customer would still have 90 days to respond. That doesn't change. There's just an extra 30 days built in

Mickelson, Christopher

I'm just trying to get a solid understanding when a termination can happen. If no verification understanding, there's kind of this piece here where if you come back later and verify that you basically can hop back on the program and retroactively have the benefits applied, so you're made whole either way, if it turns out you got terminated from the program due to whatever instance in your life.

Misty Velasquez Community Action of Skagit (Guest)

Right. So that last 30 days is basically administrative paperwork and getting the information to Cascade and you sending out the final letter to the client. And then on the last day of that 120 days or whatever the 121st day, there are actually removed from the program. I think that's still up for discussion with Cascade, but Avista has decided that it will be like the full extra month of benefit, so 121st day.

Corey Dahl (PCU-he/him) (Guest)

In terms of the discussions with Avista, for example, if the customer does respond within the first 30 days and it turns out there has to be some change to their eligibility, whether that be removal from the program or just to change in benefit based on a difference in the income that they submitted throughout self-attestation, which could obviously result in a smaller or larger benefits, there's 3 pathways that can change the benefit, whether it be any of those three things that that can happen sooner than the 120 day mark, correct?

Charlee Thompson

That's my understanding.

Misty Velasquez Community Action of Skagit (Guest)

It's just the people who don't respond.

Mickelson, Christopher

And for medical emergencies, you're still discussing with Avista, but why would they need additional time? Like what situations are you guys thinking about? Where 90-120 days isn't enough.

Charlee Thompson

We haven't gotten really into specific specifics of what situations might come up and when. That was one thing we should talk about is medically fragile customers. But I think where we're headed right now in the discussion with these costs, this subset of customers is if there is a way to keep customers from any other means that agencies might have to be able to keep them on the program if they aren't being responsive within the 90-day window. The short answer is when I have more information about how Avista is handling this and what examples might come up, then I'll bring it back here.

Mickelson, Christopher

It looks like they're talking about a two-year term from verification. Are there any concerns from agencies about doing a two-year term since I know LIHEAP is annually, is there any appetite, maybe for this first program year or maybe first couple of program years only do a one-year term until we kind of get a sense of discount tier levels. It looks like there is possibly a concern about getting clients to come back on an annual base to get LIHEAP, in addition to this program. So maybe do one year term for the first couple of stages of these program might be a good idea.

Charlee Thompson

I think this is one where I want to have or hear more from other parties here on what they think Avista PC kind of split in their thinking here, Avista decided on two year to make it easier for customers who are enrolling and to because the goal of the program is to have this be an opportunity to have increased enrollment and penetration for assistance and they thought this would kind of break down a barrier, because we know that there's a significant drop off of customers after one year from California data. PSE decided on a one-year term because their PSE help program, which they're going to continue to implement, at least in the first year of the BDR program, is on a one-year basis as well. And then the concern that Misty brought up was also brought up in the PSE discussion, so I personally lean towards the two years, but curious what others think.

Corey Dahl (PCU-he/him) (Guest)

I agree, I'd like to explore the two years but it might take some more time as Lorena had mentioned in conjunction with the discussion about maximizing federal dollars along with this element of the program. And in particular, I'd like to explore the two-year term with Cascade because WEAFF would not be carrying forward so that analog that PSE has in terms of their help program continuing, it just isn't here for Cascade. So that that's why I think it makes sense to pursue discussion on two years.

4. Maximizing Federal Funding (if time permits) – Dan Tillis

Tillis, Daniel

Well, that wasn't on the agenda, but it was a great discussion and Yochi before you joined, I did share that I need a drop off 1/2 an hour early for another meeting. We've got about 20 minutes left with me on and then we'll let you all decide if you want to continue. I'm going to share the agenda again because I've added some info while we've been talking for the next topic. We also had on the agenda, if time permits the income collection as part of the bill discount qualification process and maximizing federal funding. Before we move one, I was going to go through Avista's approach to the income verification process to see if we want to align with Avista. And in that process, we talked about aligning a lot of it last week and that's how we got into the discussion of what the volume might look like. If anybody would rather talk about these other two topics, we could do that as well. Does anybody prefer to discuss either income collection during qualification or maximizing federal funding instead of trying to maybe get close to alignment on the income verification process? No- OK. We'll go through it, I apologize, the plan was for me to pull the some of the agreements we made last week on this or close to agreements on the meeting minutes. The person who does those minutes for us was off last week and didn't have the recording until yesterday, so she hasn't been able to put together the minutes yet. Between last week's discussion and this week's, we'll definitely have something for next week for us to review. We've all agreed that we'll pull a random sample without considering any other information as far as demographics or account information or anything like that, we'll pull a random sample from the pool of customers who qualify through self-attestation. We have agreed on a percent of those, we were looking at 3%. We've talked about that some in these meetings, it feels a little low. I think I've thrown out 5% recently. I'll just pause there and see if anybody has any opinions on the percentage if we wanted to do 6% to align with Avista, it's only 1% more than five. I'd be fine with that; PSE is using five. Everybody OK to use 5%? I see you in a couple thumbs up. I don't hear any objections. We'll go with 5% for right now.

We agreed many meetings ago that the agencies will conduct the income verification process. It will be a monthly random selection process with new accounts to verify provided to the agencies each month, our goal is to do that via our assist portal. We will need to see if we'll have that ready by then, but the goal is to use the assist portal. Avista is going to use 90 day window to allow the customer to provide to respond and provide income verification and I think I initially said that 90 days feels like a long time, but through the conversation I think you all convinced me that 90 days is probably a good starting point, so I'm comfortable with that at this point. Anybody have any different opinion on using 90 days? Misty is good - OK.

Yochi Zakai

Dan, can I ask for a clarification? I don't know if you went over this, the 5% would be 5% of each agency's enrollment for that month, that way we just avoid clumping if it's 5% Cascade wide, it could be that the workload disproportionately impacts an agency, which is I think something we want to avoid.

Tillis, Daniel

OK, that is definitely not something we talked about last week. I guess if we did 5% by ZIP code, we could probably get there. I would think that might be the best way to do it. Any thoughts on that Chris?

Mickelson, Christopher

So you're wanting to do 5% at basically each county? Some agencies have multiple counties, so I'm just trying to get a sense of how we would do that audit process because we wouldn't really have the agency, so we would need to use county or zip and I would think county would be more in alignment with what the agencies deal with.

Yochi Zakai

Yeah, that sounds good. It looks like that's what folks in the chat are supportive of as well.

Tillis, Daniel

So 5% by counting randomly selected.

Mickelson, Christopher

The randomly selected 5% by county, that's only for the self-certified people, correct?

Tillis, Daniel

Yes. I think that's about as far as we got on going through the income verification process in the discussion. I looked through the Avista process earlier and other than the flow chart I think we can mostly align with their contact points. We don't really collect the customers preferred method of communication. Customers can opt into e-mail and if they opt in to e-mail for something like advising them that they've been auto enrolled into the bill discount rate program, we will send them an e-mail rather than send them a letter. We would assume if they're opting in the e-mail there, that's a good communication method to reach them and if they're not opted in an e-mail then we would send them a letter for example, so we would approach it in that way. If we don't hear from them, send them a letter for example to a different touch point.

Lorena Shah

In that scenario, will we know as the Agency doing the eligibility verification if they've opted into e-mail or not? Because I think that's more for the agencies on how we can most likely get in touch with the clients once they are passed over to us, after the letter goes out or e-mail goes out from the utility. The idea would be to try to first reach them on their preferred communication method whether that's phone, e-mail, or mail. Would we get that information whether they've opted into e-mail or not?

Tillis, Daniel

I think we could definitely tell you whether or not they opted into e-mail and we don't typically share a customer's e-mail address with third parties because they've shared it with us for specific purposes. We do have an energy assistance category that they opt into and that may not be the exact name of it, but it's one of the purposes it's used for. If they're opting into that, then I'll have to check to see if we'd be OK with sharing their e-mail address with you.

Lorena Shah

I guess in my mind, I had envisioned that if they are applying with the utility company directly that the application would include that that question about what's your preferred and would have that information and then somewhere in that application there would be an acknowledgement that your information will be shared or may be shared with the Community Action Agency, whatever we decide on how we want to word that. But there would be some level of acknowledgement that they would have to acknowledge that the information would be shared with us. Otherwise, we won't have the contact information we need to reach them quickly and efficiently.

Tillis, Daniel

That's a good point. I hadn't thought about building that into the into the CSR flow and in the discussion. We can look to see if that's an option to build that in there and then record that preferred method somehow. We don't have a place in CC&B to record it currently, I don't think. We may be able to possibly add an option to collect it for the preferred method and then get their consent to share it could be part of our talk off when we tell them that they might be subject to a post qualification income verification process. Their preferred language is actually something that we're starting to collect and so we could build that in as well. Lorena from your chat - 7. We do have the ability to record that in CC&B, it's not something we've been recording, but there's actually a new requirement in Oregon that we start asking that question on new service starts. We are starting that process and so we can build that into that flow as well for Washington to start collecting that.

Charlee Thompson

I like this conversation and the creative ideas popping up here. This is this is great. I was kind of thinking also in to add ways or options or opportunities to ask what customers preferred communications methods are, whether that be people coming in to sign up for BDR or people coming in for verification. Or maybe I think Lorena mentioned this, asking it on the application itself. There are ways to ask for this and then have that effective communication with the customers.

Tillis, Daniel

I don't know that we have time to really get into all the touch points today and all could stay on after I drop and try to work through some of that if you want. But I think it would be a good topic for the next meeting to go through the details of all the touch points that Avista is going to use and just agree on what it might look like for Cascade. We can go through some of these other bullets as well, just to talk through those. If they don't respond they're removed from the bill discount rate, but if they respond shortly thereafter, they can be set back up on it. There's some of that detail in here that we can get into that next time, or you all could continue.

Yochi Zakai

We can continue staying on, I think considering our timing constraints I would support continuing the conversation for another half hour. The other thing I wanted to know was, since we were discussing the application, I don't know if we have this noted as a consensus item, but I wanted to make sure that we're on the same page about this. I was envisioning that sharing information on the application would be kind of condition

Lorena Shah

I can pipe in for Yochi for a second. We're thinking is that the customer would need to agree that their

information will be shared as a condition of enrollment, since it is likely that it will be shared at some point for the eligibility verification. So, that needs to be on the front end where a condition of enrollment is agreeing to have your information shared with the agencies.

Tillis, Daniel

That makes sense. I'll check our privacy policy; it may already be covered in there. I know that we mentioned in our privacy policy for sure that we may share information with third parties for purposes like energy efficiency. As an example. I just cannot remember what all else is in there. If it's not, then we'll have to establish a new process for that and get that consent during the conversation and recording that somehow. We will need to get it on our website if they apply it to our website, but the vast majority of our applications are likely to come through our CSR's and credit team. I need to drop, I'll let Chris and Teri take the conversation from here and I'll check the video and the minutes to catch up on everything you all talk about. Have a great rest of your day.

5. Set key topic(s) for next meeting – Dan Tillis

Yochi Zakai

I think it would be nice if we could wrap up verification and see if we can get agreement on anything and then move to have a full discussion on the one year versus two-year term.

Charlee Thompson

Seems like we have our agenda items for next time then.

Charlee Thompson

We made good progress today.

Mickelson, Christopher

Yes, we did. Thank you everyone and look forward to more of this discussion next week.

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