WEAF Advisory Group

Agenda

April 12, 2023

KEY TOPICS: Post-qualification verification process, income collection as part of qualification process

GOALS FOR MEETING OUTCOME: Outline all components of the post-qualification income verification process, finalize income collection process, begin discussion on maximizing federal funds (if time permits)

1. Post-Qualification Verification process – Dan Tillis

From Avista:

Verification
What we've agreed upon

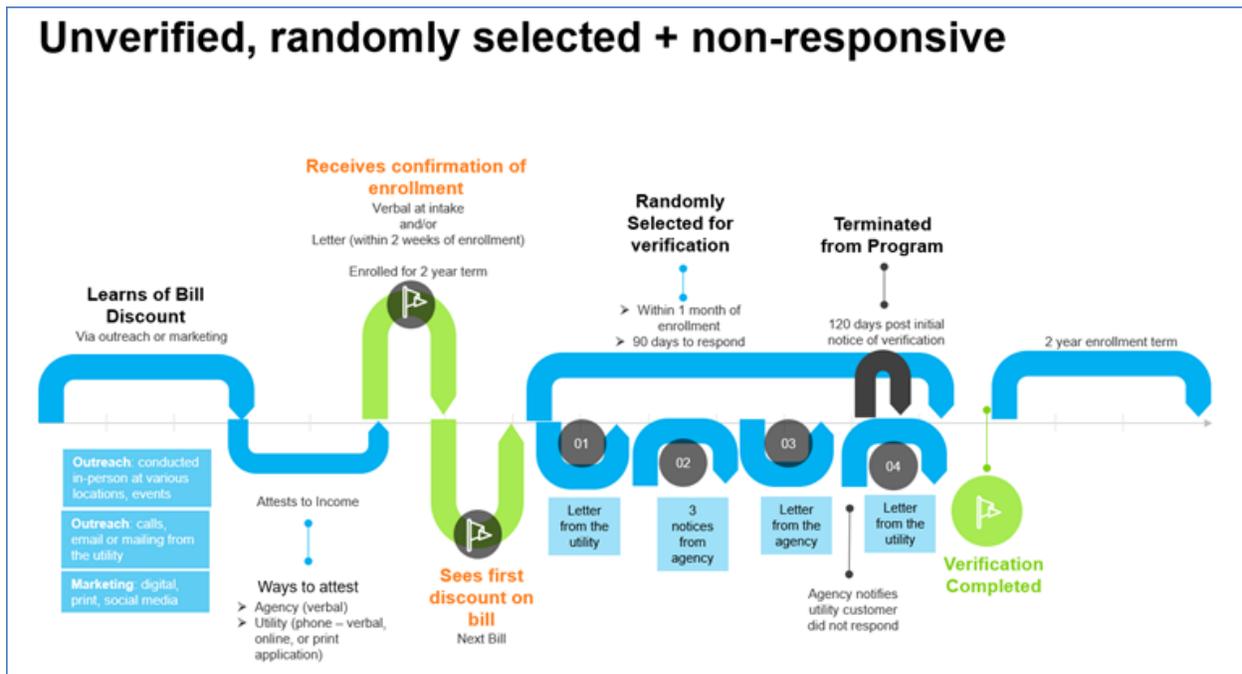| Verification	Intent to verify the program is engaging the intended population and providing the appropriate level of benefit
	▪ Completely random selected pulled from the previous month's enrollments and no use of probability characteristics for identifying customers for verification because of the potential of the perception of bias (e.g., high energy users, high discount percentage) ▪ 6% of the total enrollment pool for random selection. Those who have been verified will be captured in the verified percentage amount but will not be required to complete verification
	The agencies support the monthly verification with a 90-day completion window once the process is started
	The terminated from the program letter should: ▪ address the reason with detail around the customer situation, such as: ▪ terminated because they were found to be ineligible are informed to contact their local CAA if their household situation changes ▪ non-respondents can contact their local CAA to complete the verification process to be re-enrolled into the program, if qualified

Verification
What we've agreed upon, continued

Verification	• Randomly selected participants will be notified there is 90-day timeline to complete the verification. If they do not respond within the 90-day window they will be terminated from the program.
	  – If the participant does not complete verification, they will be terminated at 120-day point
	• Randomly selected participants who have been terminated for non-response, and complete verification within 90 days post termination will receive a credit for the months they were not enrolled in the program
	  – the credits should be specific for 1, 2 or 3 months and by income tier
	• Non-responsive individuals may be verified by either of the following methods for continued participation in the program:
	  – agency verification based on data
	  – customer is identified as medically fragile (term to be defined; with consideration for WAC 480-100-128(8) that discusses medical emergencies)
	• The verification notices/reminders from the agencies should be in the customer's preferred contact method, where possible (e.g., phone call, text, email or letter)
	• The number of touches is sufficient (i.e., 2 letters from utility, 3 notices/reminders in customer preferred method for contact, and 1 letter from the agency).
	• The 2-year term starts from the date of verification

WAC 480-100-128:

Unverified, randomly selected + non-responsive

Learns of Bill Discount
Via outreach or marketing

Outreach: conducted in-person at various locations, events

Outreach: calls, email or mailing from the utility

Marketing: digital, print, social media

Attests to Income

Ways to attest
➢ Agency (verbal)
➢ Utility (phone – verbal, online, or print application)

Receives confirmation of enrollment
Verbal at intake and/or
Letter (within 2 weeks of enrollment)

Enrolled for 2 year term

Sees first discount on bill
Next Bill

Randomly Selected for verification
➢ Within 1 month of enrollment
➢ 90 days to respond

01 Letter from the utility
02 3 notices from agency
03 Letter from the agency

Terminated from Program
120 days post initial notice of verification

04 Letter from the utility

Agency notifies utility customer did not respond

Verification Completed

2 year enrollment term

Tillis, Daniel

We had a very, very productive meeting last week. Lots of important decisions and hopefully we can continue some of that this week. I had to drop 30 minutes early last week, but I did read through the minutes, so I'm up to speed on a lot. What I pulled out of the minutes for discussion was continuing the post qualification verification process discussion and we still have income collections as part of the bill discount qualification process, as well as maximizing federal funding, both of those as next topics if time

permits. There was a lot of discussion about whether we should have the EDP, the bill discount rate last one year or two years, the collection process as part of the upfront qualification, and maximizing federal funding that we want to continue, does everyone agree with that?

Peter Damrosch
Yes, it sounds great.

Tillis, Daniel
Just a quick review of what we agreed to last week for the tiers and the percent discount, Tier 1-20% FPL, max 4% AMI, Tier 2 - 50% and 12%, Tier 3, 100% and 24%, Tier 4 - 50% and 36%, and then Tier 5 - 200% and 80% as max FPL and AMI, then discounts of 90%, 71%, 40%, 15% and 8% for those tiers. For the auto enrollment process, it wasn't on the agenda, but we took care of it anyways and this is what I collected as far as how we'll auto enroll customers and effective with the October 1, 2023, program start date, with the new bill discount rate and AMP hopefully in place by then. We'll pull all WEAF, and Winter Help pledges from the prior program year, so October 1, 2022, to September 30th, 2023, from Cascades Assist Portal. We'll utilize FPL and AMI data that is provided by the agencies and up into that portal to auto enroll those customers into the correct tier. We'll then also pull all LIHEAP pledges from the assist portal that were submitted by the agencies, send those back to the agencies for them to use the calculator to add FPL and SMI and or FPL or AMI on to whatever format we provide those customer accounts and send them back to the company and then we'll utilize that data to also enroll those customers into the correct tier. If for some reason we're not able to get FPL and AMI for LIHEAP only qualified customers, then we'll auto enroll those customers into Tier 4 since we know that customers FPL is no greater than 150% since they qualified for LIHEAP. We'll set all those customers who are auto enrolled, letters advising what we've done and to contact the company if they have any questions or concerns or feel they should qualify for a different discount level. Any questions or feedback on that? Alright, hearing nothing, I'm going to assume I got it right. That took us to the rest of the discussion for the last week's meeting which was all about the post qualification income verification process, and we got 4 agreements and then lots of great discussion after that. And so those agreements were that we would do a monthly random selection of 5% of customers who qualified via self-attestation, customers who qualify with verified income documentation would not be in the pool of the 5% random selections. We'll attempt to do that selection by county to attempt to evenly distribute the accounts across the agencies based on customer account within the counties and agency size of course. Bigger agencies would have a greater selection, random selection pool and therefore we get more accounts to verify, but it would be proportionate to the agency size and the county size. Selected customers for the random sample will be provided to the agencies at the beginning of each month for income verification. Our goal is to use our assist portal to provide the accounts for verification. We don't know what all work will be required to do that yet, so we'll need to figure that out. And if we can't have that done by November, which would be our first random sample, then we would need to figure out an alternative alternate method. We agreed that the window after the random samples pulled would be 90 days for the agencies to then verify income for the selected customers. And then there was, of course a lot of discussion about some of the other points, but I think that's as far as we got as far as agreements go. Anything I missed or misrepresented? I want to pull the Avista slides back into this just for discussion purposes to have all on one view. They've shared this with the stakeholder group they're working with on establishing their bill discount rate and including the post qualification income verification process. I think we've covered a lot of this, certainly the top half of this part where we've all agreed to the

components that are in that section, we haven't talked about what should be in the terminated from the program letter yet, so we need to talk about that still and then we haven't made decisions on the 120 days versus 90, the 30 day window as a grace period where the customers not quite removed from the program yet. I also think on that second Avista slide we still need to discuss the provisions for protecting or helping customers that don't respond that likely still qualify, which is some of those points, like Avista's proposal to give a credit to customers who after their 90 day window is up if they come back in and complete the verification process, they'll receive credit for the month that they weren't enrolled in the program. So, to the customer, they have the full 90 days or three months from the start of being notified that they should come into an agency and show proof of program eligibility. Behind the scenes from the utility and agency systems perspective, that customer who might not have responded won't be removed from the program until 120 days is advertised to the customer that they have 90 days. But from the systems perspective, the customer gets their full 90-day opportunity to remain on the benefit program and also to respond, an extra month behind the scenes is happening so that the agency and the utility can do that work to remove the customer from the program.

Tillis, Daniel
We need to talk about preferred contact method because we have some issues there. Let's start on the 90 versus 120 days for the verification of income. To recap, what Charlee just shared, what we shared with the customer would be 90 days, that's the time frame they have, but we wouldn't remove them from the program until 120 days just to give time in case there's still work being done by the agencies or some other delay which would prevent us from removing the customer and then potentially having to add them back, which is the risk if we don't do that for the company, is that there's work to get them back on the program. Does anybody have any insight into how PSE is treating them?

Charlee Thompson
I think PSE is still working through how they're going to handle nonrespondents. Right now, the only thing they've decided is at some point customers who don't respond will be removed from the program, but then what extra precautions and provisions are around that hasn't been discussed yet, but if someone else who's working with Avista knows something that I don't, feel free to jump in.

Tillis, Daniel
We haven't had a chance to meet internally but I'm going to give you, my opinion. I don't have any issues with starting with the approach that Avista is using simply because you know we can always change it if we feel like it's failing. For some reason we're six months into our program in Oregon and we don't have a verification process in place there yet. I think we're getting very close, but it was one of those things that we were able to start there without working out every detail because it's under the law, it's a temporary program that must become permanent at some point. Allowing that extra 30-day grace period I'm OK with starting that way and seeing how it goes. Anybody have any objections to that? No. OK. If customer is non respondent and the 90-day period is up, then removed at 120 days, does the clock for the additional 90 days start after the initial 90 days or does it start after the 120 days for reinstatement and the credits.

Charlee Thompson
I think it starts after the 90 so that extra 30 leads up to the 120 is behind the scenes that the customer is on but hasn't been advertised so then they have the three months or the extra 90 days to come back and get that back credit for that was my understanding anyway.

Tillis, Daniel
So it's 180 days after the randomly selected basically, or their first outreach after their randomly selected.

Charlee Thompson
Yes.

Tillis, Daniel
OK. How would operationalize monitoring that and getting credits issued? I'm thinking that would have to be a manual process. I know some of the concerns shared last week is that we're essentially giving four months of a discount to a customer who may be non-responsive and we're not pulling any of that money back because it's a risk-free program which I think that Cascade's comfortable with. And then a customer could be given 180 days to verify and then we're doing a lot of work to pull them out of the program and put them back in with credits back dated to when we started the outreach to get them to respond.

Peter Damrosch
I worked with Yochi and the energy project for people I haven't met been involved in the Avista Northwest natural parallel processes, but not on Cascades. It's nice to join you all. I'm not sure if you talked about this last week, but some of the background motivation for this proposal is coming out of seeing what's been happening in California, where they've been seeing a lot of people don't respond to what they called post roll and verification. And then later, you get back on the program realizing that they were always eligible, and something came up that month or they didn't get the notice. I think the perspective for this option is recognizing that these are people who should have always been on the program, something happened, and they were removed, but they were always eligible - it would be great to sort of treat them that way. There are some implementation steps and of course we'll defer to you on whether you think it's something you could automate or do manually. Think of the automated world you would check to see if somebody who's been added to the program was removed for nonresponse and are they reenrolling within 90 days of when they were removed and then you could apply a broad looking credit. The system is much better in terms of whether that's doable from a more automated or semi-automated perspective.

Tillis, Daniel
That makes sense. I appreciate that it's being based on what's being sent and seen in California, so we have some information from experience with it anyways. I understand that they would have been qualified the whole time had they responded, I also see the side we're planning to tell customers when they do qualify that they may be selected for a post qualification verification process. A lot of the discussion last week was that Avista is going to start the term over when a customer goes through verification, and so it'd be another 12 or 24 months, depending on what we decide on. So, a customer who gets reenrolled, calls five months into the verification process would essentially be getting a 29-month term basically which isn't the end of the world, but they're getting something that the non-verified customers aren't getting. In that case, I don't know if staff has an opinion on if that's treating customers differently. I guess if you're selecting them for post enrollment verification, you're treating them differently as well. So, I may have just answered my own question, but I don't have a strong opinion either way. I think it's going to be difficult for us to operationalize and that makes me a little

resistant. But I don't want to just be resistant because it's difficult to operationalize so Teri, you're on and you'll be helping operationalize a lot of this; what are your thoughts?

Sovak, Teri
It's hard to say. We just have the little bit of experience that we have with the one program so far and a lot of that has been manual to start, so I know what we can do at the beginning and what we can do down the road might be a couple of different things, but I anticipate that you know much of it will be manual to start.

Tillis, Daniel
Chris has mentioned in the past that we try to align with Avista because we have a lot of overlap with them and I'm trying my best to keep us as close to this as we can. Understanding we're not the same, in a lot of ways, I guess this is one we could attempt to try to do in the same way they do and if it's not working, we'll adjust. Ninety days feels like a long time. Any thoughts on making these 60 days, almost half a year versus the be five months instead of six months, essentially that they'd have from when we initially started reaching out because I don't understand the ninety. If customers don't verify within the initial 90 days, are they really going to then verify in the next 90 days?

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Misty Velasquez Community Action of Skagit (Guest)
From an agency standpoint, it's going to take close to that to probably get in touch with a lot of these clients. People don't tend to respond quickly when it comes to verifying income, at least in our experience with people, we are scheduling out for appointments right now in June. So, if and they've got from now until June to gather all their documentation that they need for their appointment they're going to come to their appointment and don't even have all of that put together, so it's going to be a lot of work on the agencies part to contact them to work with them to get the documentation that they need. I feel the 90 days is much needed for an agency standpoint.

Tillis, Daniel
Are you talking about the initial 90 days or the additional 90 days?

Misty Velasquez Community Action of Skagit (Guest)
The client applies for the BDR say in October, I would assume would start from November going out 90 days and that's the 90 days that I'm talking about.

Tillis, Daniel
OK. So, we've agreed that we'll go with 90 days from that initial verification timeline that we're talking about right now and Avista is going to if a customer is non respondent during those initial 90 days. If at some point, they contact the agency in the next 90 days after that, so a total of 180 days from when the verification process starts and then they get their income verified, then the agency will provide the company with that information. And depending on when that is in that second 90 days, the company will reinstate the customer into the program, we will issue a credit for any discounts missed.

Misty Velasquez Community Action of Skagit (Guest)
So I want to speak on just on my agencies behalf and I can say that if we're going to do an additional 90 days waiting for the client to contact us, we're not going to close out that after the 1st 90 days and they don't respond in those 90 days. That is going to put a huge burden on my staff withholding files and and

having to monitor those files separately, then the next 90 days because we're going to be getting files every single month.

Tillis, Daniel
Right.

Misty Velasquez Community Action of Skagit (Guest)
It's going to be very chaotic and having customers calling us whenever they feel like. I know my staff would rather close out that file and it's done and over with. And then the person needs to reapply for the BDR somehow and show verification at time of reapplying or something. That's how I would go with my agent knowing that it's going to be a hardship already for us to be keeping track of all of the verifications.

Peter Damrosch
And can I just chime in? Just to support that Misty, I think that sort of matches what we had in mind, which is you know they don't respond within the 90 days their files closed out. The question is if they then reapply within three months do we give them a credit for saying right now they're back on the program with the new application, but they had been removed and they never should have been removed. I don't know that you have to hold the file open. It's maybe a question of what happens if somebody who's now seeing that they're bill has gone back to its original amount.

Misty Velasquez Community Action of Skagit (Guest)
So if they're reapplying after that first initial 90 days and say they have to have an appointment at that point to come in and show verification because we are going to be very busy with verifying other LIHEAP appointments, other PSE help appointments, things like that, I am going to say at that point they're going to need an appointment to verify their income. I don't see a problem giving them a credit for that at that point. If it's within 90 days after that they come in and schedule an appointment and get verified at that point. But they're going to need, for our agency, an appointment to come in. It's not something we're going to be able to do like instantly.

Lorena Shah
Kind of just staying with where Misty's thinking, if we close from an administrative standpoint it's going to be easier to cleanly closeout that 90-day eligibility verification, send that off to the utility to pull them off the rate, and then messaging if you can get back on the rate by verifying information within the time frame. I am also thinking an appointment of some sort would probably be required to do that as well, or that would be the cleanest way to do it. But I do really support and like the idea from a workflow standpoint we can figure that out and we can all agree that these folks will have to contact the agency, have a verification, or have an intake appointment and whatever that might look like for the different agencies. But if we can then agree that if they if we do that, they can get that credit for that time missed. I think that would be a really nice carrot to offer people and would meet that desire to not kick people off who were in fact eligible. I know with BDR it's supposed to be on demand or close to on demand and so does putting people through the you did not respond to the request so we removed you, at that point, either they could go back and do a self-attestation again through the web or through the utility and get back on the rate and not get a credit. At least get back on the rate or they could go this route to verify and get credit. Would that be kind of the two routes at this point? Does that kind of satisfy the regulatory requirement of it being on demand that they would have the choice to do it

quickly through self-attestation, but if they wanted the bonus of the credit they would need to do with this other way?

Tillis, Daniel
I'm struggling with the process of a customer qualifies on demand, we add the discount rate to the account as practice as quickly as possible. Our plan really is to automate that through the portal and its connection to our CC&B system, and then the customer gets selected for verification, and they don't respond and are removed after 120 days of receiving a bill discount rate, then a month later they notice their bill discount rate is gone. They would call the company and our CSR would go through the process to qualify them again, but the CSR's not going to know that they didn't respond to verification attempts, necessarily. We do add notes when we send letters on the account, so we must have a process at the end of 90 days if they don't respond to add a note that says the BDR's removed because the customer didn't respond. And then, a process for our agents to follow a different path in that case - it's complex. It's a risk-free program you get the bill discount rate if you are selected for verification, and you don't respond then the bill discount rate is removed. And if you want it again you can contact the company or the agency to get the bill discount rate added back without having any of the prior credits or discounts removed. If you get selected for random verification again and you must go through that, then you don't keep the bill discount rate. At some point the customer has some responsibility and we're giving them 90 days plus 30 that they don't know about to verify, and I just feel like we continue to take all the responsibility off the customer and the money we're risking here and Chris pointing this out last week, as other ratepayer funds that we're applying to these accounts, the customer is not taking that responsibility to follow the process.

Misty Velasquez Community Action of Skagit (Guest)
I just have a question on something you just said is there going to be a way, once we've done verification, for us to report that verification to you guys?

Tillis, Daniel
I don't know exactly what that is, our goal would be to do it through the assist portal.

Misty Velasquez Community Action of Skagit (Guest)
I was just thinking if there was a comment box client never responded to us wouldn't whoever is doing the BDR application be able to see that?

Tillis, Daniel
Our agents don't access the assist portal. Shannon, our Consumer Specialist could see it but again, we're planning to automate those processes as much as we can to get have the file pulled from the assist portal to be inputted into CC&B, and then the discounts added to the accounts and other notes added to the accounts at the same time. We're trying to avoid a manual view of the accounts as much as we can. Obviously, the CSR's must look at the accounts as they are qualifying a customer so we could put a process in place where they handle that differently. But you know, it's just in the last several weeks we've talked about so many different processes for our CSRs, we have a limited number of resources and unless we're talking about adding head count to fund this program, we need to start really putting these processes under a magnifying glass and saying, do we really need to do those? This feels like a lot to give a customer 180 days essentially risk free to respond to a verification request. Because we're going to get those discounts back from them.

Mickelson, Christopher
So for the agencies I heard you guys' kind of talking that the initial 90 days after that, if there's no response, you're talking about closing that account or those files and then later, have these people come back. How are you viewing later as them starting the whole process over, because this talking about verification, and it sounds like if you do it that way, you're talking about 2 different initiation fees associated to the agencies for this one customer account versus the initiation fee the agencies get and then whatever this verification fee would be.

Lorena Shah
I don't know if we're thinking about it too much from a fee standpoint currently. I'm sure we will get to that conversation later but to the point, potentially talking about both the eligibility verification process and enrollment process when we're outside of those 90 days if we kind of continue down that route that we've kind of been discussing.

Mickelson, Christopher
So in that instance there would be basically the first setup, whatever that fee is then the verification fee and then this posts which I guess for verification, which would really be another initiation, so there's kind of three fees then associated with this one customer during this as Dan pointed out. So not only is this customer getting risk free access to discount our other customers are paying three times the fee associated with this customer.

Lorena Shah
There's three discrete pieces of work.

Mickelson, Christopher
Yeah, I understand, but I'm just saying they first sign up for the program, then they get verified and because they took too long to really get verified, they're signing up again. So, it's 3 distinct processes.

Lorena Shah
Yeah, but we may see them three months later to reenroll. Regardless of whether we do the credit and or keep it open they still have the right to come back in and either apply with the utility or apply with the agency.

Mickelson, Christopher
What would they reenroll for?

Lorena Shah
To get back on the discount rate. In the event somebody does not respond within 90 and we do close them out completely and then they show up in our office three months later we are going to reenroll them.

Peter Damrosch
And just to chime in on that front, I think that's what California has been seeing, which is a lot of people do come in after being removed. You know, the discounts finally removed from their bill, they start feeling the financial hit and then they come back in to reenroll. That's a sequence we'll have to plan for either way.

Mickelson, Christopher
I understand, but that that adds complexity in how we show the Commission what the program cost will be.

Roberts, Andrew (UTC)
I think when we started talking about this timeline with Avista, my first reaction was that it seemed like a long timeline. But then I started thinking about the position that the people who are going to be using this program could find themselves in how you're struggling to make ends meet day-to-day. The stress that an individual who's in that situation alters her thinking and they're focused on how I make it until tomorrow, and what do I do to make it to tomorrow. I think that's a good support for the longer timeline to get those people the opportunity to get the documentation that they need.

Tillis, Daniel
I understand that. To essentially allow a risk-free enrollment if staffs position is that you agree with the additional 90 days, I guess I would want to establish, if we go with it, a process where and Teri if I say something that we just can't do or Shannon, just tell me, after the 90 days has expired and we get notice back from the agencies that the customer has not responded and then we ultimately remove them from the program on 120 days, apply a note on the account that says customers removed from the bill discount rate due to non-response. When our agents see that note that they advise the customer of that and tell them they must contact their local agency to reapply, and then go through the agency to verify income during that reapplication process, and then the agency notifies us. Now that the customer has successfully gone through income verification qualification, we would reinstate them and issue any credits that are necessary rather than our CSR's going through a second self-attestation with a customer who is nonresponsive. I would rather we just see that note and say I see that you were getting the bill discount rate, I see you're removed from the program because we reached out to verify your income and you didn't respond, therefore you need to go to OIC, here's their contact information, they'll take you through the application and income verification process. Once they notify us that you qualify again through income verification then we will reinstate the discount at the appropriate percent or discount or tier level and issue you credit for any of the time that was missed.

Sovak, Teri
Dan, that's I think certainly possible from the CSR side, and I think it kind of goes back to a question that I heard from one of the other participants here where once dropped them to get back on, there needed to be income verification that it wasn't just a perpetual process for self-attestation.

Tillis, Daniel
I think to me that's the only effective process to prevent that loop that you're talking about.

Charlee Thompson
This conversation has come up with Avista, at least maybe PSE also but certainly with Avista like how do we prevent that endless loop of self-attestation? If that's not in the best interest of balancing the program's effectiveness and integrity, and something that came off that like we discussed with Avista was that maybe it's once per program year a customer can self-attest if they get removed from the program and want to get back on and maybe receive up to three months of credit, then they can set up the appointment with their cap and provide that income documentation. But after that they can't self-attest until the next program year has started, so a way to stop the loop but not a way to prevent the accessible benefits of self-attestation.

Tillis, Daniel
That seems reasonable, so let me see if I can state a recommendation and see if we can get consensus or modify it from what I say; if a customer qualifies initially through self-attestation and they are randomly selected to go through the post qualification income verification process and they failed to respond after 90 days, they will be removed from the program after 120 days unless they contact the agency in that last 30 day window to verify their income they will be removed from the program at 120 days and if they contact the agency. If they contact the agent or the company within 180 days from the original date they were selected or date they could receive the 1st letter indicating they were selected for verification, then the company will note the account and advise the customer they must contact their local agency to go through the application process and provide income verification and if they do that within that 180 day window, then the agency notifies us they successfully qualified in the tier, they've verified their income, the company will reinstate the program at the correct percent discount and go back and issue a credit for any time missed from when the customer was removed from the program. So that's the first part I think, and they can only self-attest one time in a program year, which the subsequent qualifications being required to go through the agencies using income verification would prevent the self-attestation from happening more than one time per year. Does anyone have any thoughts on that process?

Mickelson, Christopher
What does one time per year mean? If you self-certify for my understanding, you get on the program, we haven't really decided if it's a one year or two-year period. If we say it's a two-year period, what does one program year mean?

Tillis, Daniel
During a program year say I qualify on October 2nd through self-attestation and then I get removed from the program because I didn't respond to the verification request, I can't qualify through self-attestation again until the following year or after October of the following year, it's the October 1 through September 30th program year. You can only qualify via self-attestation during that period. If you never get selected for income verification, then you just stay qualified for the entire whatever term we decide on.

Charlee Thompson
Even if we do decide on a 2 year or 24 months term program year, in my mind was still October 1 to October 1.

Tillis, Daniel
I can try to document the flow and maybe something we want to try to come to agreement. Peter says it's a good approach.

Misty Velasquez Community Action of Skagit (Guest)
So can I just clarify, would we be closing out after the 1st 90 days at an agency level, right?

Tillis, Daniel
Yes. You'd close that out, advise us the customer didn't respond at 120 days we would remove them from the program and then the rest of that process I went through would be after that period. If they qualified through income verification again, we would reinstate and issue the credits, but must be through income verification through their local agency. I'm not opposed to restarting the term whatever

length we decide on when the customer provides income verification, because I guess technically, they are officially qualifying through income verification and requalifying at that point. And I certainly want to remove any obstacles we can to get customers in the program and retained in the program, but I know that in CC&B we have some challenges with changing these bill discount rate terms and start dates specifically. Would we just remove the bill discount rate and reapply a new one or we just change the end date on the bill discount rate on these accounts? If you need time to think about that and answer it later, that's OK too.

Sovak, Teri
Well, the discounts are picked up by the rate and that will depend on when the account next bills. Typically, we could be back dating of when this one end and when another one begins so that it gets picked up on the next bill type.

Tillis, Daniel
Let me just give you an example to maybe make it easier, at least for me to understand and I'll just go back to the data used earlier when Chris asked this question. Let's say we get this program in place and a customer qualifies on October 2nd, 2023, and then at the beginning of November, they're selected for post income post qualification, income verification. On December 2nd they go to the agency, provide their income. The agency notifies us that they income verified and qualified again that date. And then we want to update the bill discount rate to either last either 12 or 24 months, whatever we decide on from that date instead of from October 2nd. Can we have a clean process that doesn't cause billing incorrect billing for that change to restart? Essentially the bill discount rate?

Sovak, Teri
If we're changing the discount rate, it's going to be on the bills going forward. But then you're wanting it to be 24 months from that period? With what we're doing manually it would impact the automation. I'm sure if we get to the point where we wanted to automate it.

Tillis, Daniel
So that that part would have to be a manual process, but we could do it. Is that what you're saying?

Sovak, Teri
Yeah.

Tillis, Daniel
OK. I'm OK with starting the term or restarting it when the customer income verifies, it just makes sense to me even though I don't like the idea of it being manual, but they would be like getting some other type of assistance later. I feel like we need to just restart it then if the customer income verifies.

Lorena Shah
I agree. That's great to hear and appreciate recognizing it is likely to be a manual process. I'm very appreciative.

Tillis, Daniel
Alright, we're going to go with that. Thanks Charlee, we're consistent with PSE there and I think that's consistent with the Avista as well. I'm going to move this one up and ask that we talk about it now. We keep stepping around it - one year versus 2-year term and I think we need to decide. It sounds like PSE is going with one year term because they're keeping PSE help and it aligns with that term or that

qualification period and then Avista is going with a 2-year term, 24-month term. We have a two-year term in Oregon. We've been talking about two years all along, I still like 2 years. I just think a customer can qualify and you'll not worry about it for 24 months. And if they need, they can get AMP the next year, then qualify again for 24 months. If they get LIHEAP, then make sure they get they qualify again for 24 months. I don't feel like in this initial period as we're implementing a new program and I don't see any value in 12 months. It will add to our verification pool and add to that work. If we just go with 12 months because you're going to be getting customers requalifying more regularly, I think that's a negative for the customer and for everybody involved in doing that work; the agencies and the company with all these things we just talked through so I'm a big fan of two years versus 12 months. Any objections to starting with 24 months? No...ok. The termination from program letter should address the reason, such as they were found to be ineligible, or they were nonresponsive. I don't see any issue with that. I think we'll align with Avista approach on the termination letter content. As you all learn more about exactly what it might include, feel free to share it and we can reach out to Anna and others. Obviously, we would tell the customer they were terminated either because they didn't qualify, or they did not respond to the request for verification and to contact the company or their agency if they feel differently.

Charlee Thompson
I agree. I like Avista's proposal and then the only thing from Avista that I think they've maybe changed, since these slides, was the termination. I think they're planning not to use that and maybe just saying program removal.

Tillis, Daniel
We can find the right verbiage for that before we do it, and I only added as much as possible in here because I put Avista and PSE. For sure it would include the reason for termination and any actions they can take to be considered for reinstatement or whatever the right verbiage is there. I don't know that we can get through any of the rest of these, so I wanted to maybe learn a little bit more about verification income communication. The alternate methods as far as the agencies already having information to verify customer or medically fragile and how that data would be provided; I I don't think there was a ton of detail in the discussion last week that I read.

Charlee Thompson
Still need to have the discussion on medically fragile customers and what that means in this case. And then I was also going to ask Lorena to speak about agency data and information.

Lorena Shah
I can't speak to the medically fragile too much, but as far as alternative documentation, I think the idea here was that in the event of a non-respondent, or maybe it's a specific type of non-respondent, sometimes agencies can access other program data that requires income eligibility of some sort like for instance rental assistance. That would have income relevant income information documented in it to use if a client is nonresponsive. This is going to vary, though I'm guessing quite a bit among agencies depending on how agency firewalls where information is set up and specifically like which programs they're running, some have strict data sharing requirements, other ones are a little bit looser. It potentially could vary quite a bit as to how agencies are able to complete that, but that was the thinking around that. And then I think with medically fragile was just generally like still providing a benefit if somebody needed heat.

Tillis, Daniel
The rental assistance application examples is A is a good example for the agent. The data you all might already have. For medically fragile one way I thought about it is you know we have customers who have medical certificates that allow some additional protections related to disconnects for non-pay as an example, and so we could exclude any customer who has a medical certificate on file with Cascade to be excluded from the random sample for income verification. I guess that could go against the approach of saying that nothing else is considered in the random sample but it's an option. Otherwise, we'll just have to talk through what else that means. I just don't know anything else about how we might handle that so some food for thought there on an option. And if a customer is medically fragile, it would be ideal if they had a medical certificate on file with the company so that we could afford them those additional protections. Now on to the rental assistance application, have you all had any conversations with Avista or PSE on categorical eligibility for the bill discount rate program?

Charlee Thompson
We have, for the first year LIHEAP eligibility feeds into his program, but I think for all other programs that might be related to rental assistance, the various types that are offered throughout the state that the agencies can be better too. That was more on the table for discussion in year 2.

Lorena Shah
That sounds right to me. And seeing with categorical, we just kind of agreed that we couldn't quite figure that for the first year but that we'd like the idea of some level of categorical eligibility. I'd be comfortable with your proposal though Dan about those that have a medical certification and exempting them from eligibility so that I think bears more conversation.

Charlee Thompson
Kind of on a similar note, to medically fragile, but going back to a slightly earlier point, maybe we can also make space in next week's meeting to talk about enrollment terms for customers on fixed incomes. I forget if we brought that up here before, so whether that's two years or three years or four years, some sort of extended term.

Tillis, Daniel
OK, that just made my head hurt.

Charlee Thompson
Lots of details, I forgot about that one.

2. Income collection as part of Bill discount qualification process (if time permits) – Dan Tillis

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

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

Tillis, Daniel
That's the first I've heard that come up, I don't have any thoughts or opinion on it right now. Since

we only have 4 minutes left, let's talk about our agenda for next week. I think we were supposed to use next week's meeting to discuss the community-based organization program and finalize those details and try to get started soon on that program for the five agencies who wanted to be involved. So, I guess we'd really be talking about picking this topic back up on April 26th instead of the 19th. So that's a good reminder that next week's meeting would be all about CBO stuff. And I can put together an agenda for that, it will be a brief agenda, but maybe some specific topics for around the CBO program development. There are a few items for verification process and then we have the enrollment terms for customers on fixed income. We can keep income collection and maximizing federal funding on there if time permits. If everyone's OK with that because we need to get to those topics soon. Another great discussion with some agreements, so continue to make progress. If anybody has anything that can't wait until next week, just send via e-mail or reach out and we can talk then. One big ask for next week; if you're one of the five agencies who is participating, make sure someone attends. Give a lot of thought to how we want to finalize the CBO program that we were required to implement and want to implement this year and when we could get started on that. Have a great rest of your day.