

WEAF Advisory Group

Agenda

April 26, 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)*

Bill Discount Rate – April 26 decisions/agreements:

- There will be 6 contact attempts for the post-qualification income verification process, with contacts 1 and 6 being conducted by the company and contacts 2 – 5 being conducted by the agencies.
- Cascade intends to provide the agencies with customer email addresses to use for contact attempts for customers who have provided the company their email address and are opted in to the company's cost savings category. Our Privacy Policy and WACs allow for this as long as we have agreements in place with the agencies that ensure the protection and proper use of the data.
- Process for medically fragile customers will be the same as for all customers in first year.
- LIHEAP will be applied before BDR rates
- CNGC will provide pre and post BDR billed amounts

1. CBO Program Reporting – Dan
2. Moving on to AMP discussion – Dan
3. Post-Qualification Verification process – Dan Tillis

From Avista:

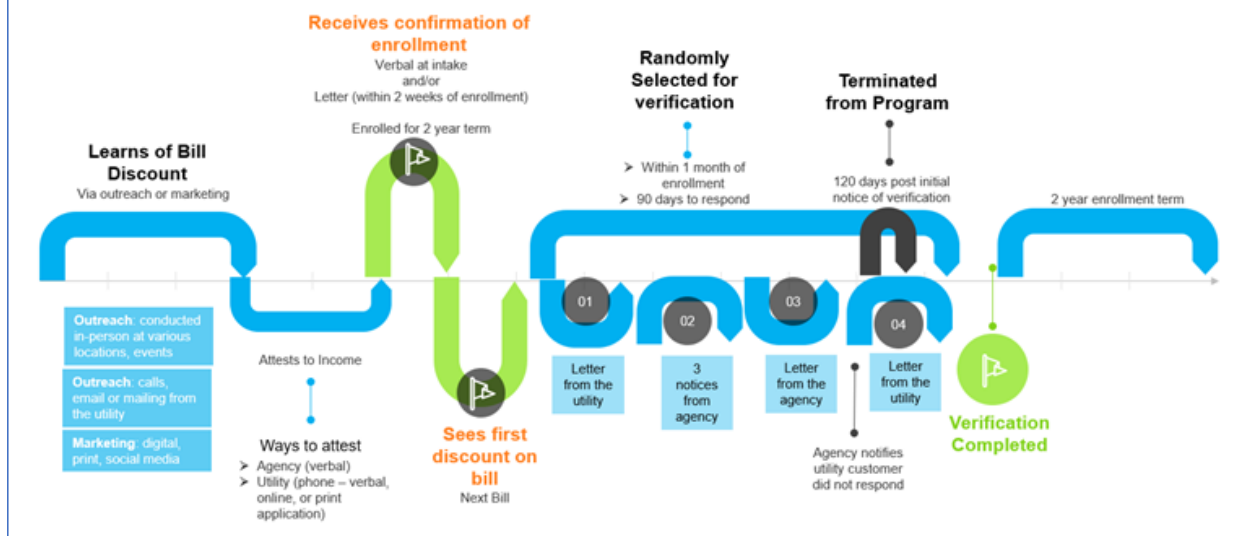
Verification What we've agreed upon

Verification	Intent to verify the program is engaging the intended population and providing the appropriate level of benefit
	<ul style="list-style-type: none"> ▪ 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
	<p>The terminated from the program letter should:</p> <ul style="list-style-type: none"> ▪ 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	<ul style="list-style-type: none"> ▪ 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. <ul style="list-style-type: none"> – 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 <ul style="list-style-type: none"> – 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: <ul style="list-style-type: none"> – 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
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Unverified, randomly selected + non-responsive



- Income collection as part of Bill discount qualification process (if time permits) – Dan Tillis
- Maximizing Federal Funding (if time permits) – Dan Tillis
- Set key topic(s) for next meeting – Dan Tillis

Tillis, Daniel

We sent out the agenda late last week and we'll stick mostly to that today. I do have a few topics I'd like to bring up before we get back into determining the post qualification income verification process. Christie from Chelan Douglas did share some feedback on the CBO quarterly report, and so I thought I'd just share that quickly. It's the only group we heard back from on the report itself, and I wouldn't say there were major changes recommended and I thought they were all good. We did decide that we would modify this from their recommendation just a little bit. I thought I'd just share this briefly and let you all look through it for a couple of minutes and then see if anybody else has any additional feedback or if we could consider this document finalized for when the first report would be due. It looks like you want to modify the dates a little bit for when things are due, but it'd be July since we'd be going by actual quarters. But I can make those changes easily. Any immediate thoughts on the changes or the report as it exists right now either by verbal confirmation or thumbs up or comment on chat.

Charlee Thompson

I think it looks good.

Lorena Shah

I think this looks good too to start with.

Tillis, Daniel

I'll ask the question the other way, just so everyone doesn't have to comment. Anybody opposed to starting with this version of the report? Alright, you've got a few in the chat, Corey and Misty saying it looks good, so I'm going to assume we're good to go on this. I'll make these other corrections on those quarterly periods and the due dates and send it out with the minutes when we send those. I'm not going to share the agenda just yet, let me get to the second topic, which is new as well. We met with our IT team on Monday to give them a status update on where we're at on making decisions for the new bill discount rate, as well as moving to an AMP. They're starting the work that they can start; they need to continue moving so we can try to get close to the October 1 day with as much automation as we can, with as few manual processes as possible. They have been asking a lot of questions about AMP decisions, so we wanted to talk through when we think we're at a point with the EDP program where we have enough to file without working out necessarily every single detail, so we can move on to make major decisions on the AMP and file them as well by July 1, which is basically two months away. Then, we can get our IT team far enough along to continue their work, while we're still working out all the details of how the flow is going to go and how we're going to refer customers to the agencies. Any thoughts after today's meeting if we're at a point where next week's meeting could really focus on starting diving into the that discussion to get our IT team moving on that as well, hopefully getting to the point of filing for both by July 1.

Zakai, Yochi

One of the things that I think would be helpful is to compare the list of decisions we've already made with the kind of letter I sent earlier that kicked off the process thinking about the key things that I wanted to be sure we work through. Before we move on, I know a couple of meetings ago you had distributed a document that had listed the major decisions that we've agreed upon so far and you've been adding those in the notes as we go. Would it be possible for you to distribute another document after this meeting that covers all the decisions we've made? And then I'll go back and compare that and make sure that we've hit all the decisions that I wanted to make sure that we covered. After I've had a chance to spend some time with that document and do that comparison, then I would be prepared to answer the question about moving on to the AMP.

Tillis, Daniel

That's where we were going to go next, program design considerations, key decisions, and agreements document. I think a lot of these goals and action items aligned with that document you sent on behalf of the group, so that should hopefully all be covered in here. I was planning on going through this briefly today to get us a level set to continue the discussions. I can do that now and then I'll also share this when we send out the minutes from this meeting so you can review it. I'll provide a quick review of this document and then I'll pause after to see if you have any questions or any other thoughts and decide if we're getting close to the point of shifting the discussion to AMP. We decided to utilize a tiered structure with both FPL and AMI included for both the bill discount rate and AMP, customers will self-attest household size and income. Cascade employees will start qualifying customers for the programs as well. We would be establishing a post-qualification verification process that we're in the middle of discussing right now and we had said it was likely going to be conducted by the agencies as far as that verification process. We've decided since then that that would be the case. We decided on March 22nd, after discussing sticking with a WEAFF type program to complement the bill discount rate or shifting to an AMP that we would shift to an AMP and arrearage management forgiveness program and eliminate WEAFF as we implemented that and the bill discount rate. On April 5th, we agreed to these discount tiers

and discount percentages, and as I mentioned we agreed that the AMP would be tiered as well, and that's not on here. We have talked about arrearage forgiveness for the first couple of tiers and then some percentage of management/forgiveness as part of an arrearage management program for the other tiers. We haven't worked that out yet as far as what those are, but that was a general discussion we had and mostly agreed on. We worked through the auto enrollment process for customers who have received energy assistance over the past year or during the current program year, essentially, and how we would do that as far as using Cascade's Assist Portal to pull customers who received assistance during this program year and Cascade Auto enrolling those customers into the correct tier. And then pulling LIHEAP pledges from the assist portal and sending those to the agencies to utilize the new calculator to tell us what their FPL and AMI would be so we could enroll them then in the correct tier as well. And then if we can't determine their FPL or AMI for some reason, if we know they qualify for LIHEAP, then we will enroll them in that Tier 4 level at a 15% discount since we know that the customer qualified for LIHEAP and has an FPL of no higher than 150% based on that. For the last several meetings we've worked through a lot of the post qualification process, it's broken up a little bit here based on when we made these agreements. I'll go over the income verification first. We discussed these parameters for income verification the last time we had this discussion since we discussed CBO program last week. We decided that customers could only self-attest to qualify for a bill discount rate one time per year, and that they could qualify again via self-attestation. We'll provide these types of income as part of the discussion, and the details on income verification, but these are the types of income we'll collect and using our calculations. The post qualification income verification process, we decided we randomly select 5% of customers who qualified via self-attestation, and we'll do that by county to attempt to evenly distribute the accounts across the agencies based on customer count and the agency size. The customers will be provided to the agencies by Cascade at the beginning of each month for a previous month's self-attested qualified customers. Our goal is to use our assist portal to provide those accounts to agencies to work from there. Customers will be provided a 90-day window for verifying their income with the agencies. If the customer's nonresponsive during that 90-day period, hopefully within the assist portal, the agencies will close that case out and notify the company via the assist portal that the customer was nonresponsive. We will give an extra 30 days before we remove that discount in case the customer does still come in or there's something in process at the time before we remove the discount. If we remove a discount for nonresponse, then we will note the account to reflect that. If customers are removed from the bill discount rate program and after those 120 days, they contact the company within 180 days from when it all started, so within 60 days after the discounts removed then our employees will advise the customer they were removed because they did not respond to the income verification request. The company will then refer the customer to the appropriate agency to go through the qualification via income verification, not self-attestation, since they can only qualify once per year via self-attestation and they were selected for an audit, so they need to go through the income verification process. If they requalify through the agency through income verification, then we'll restart the bill discount rate at the appropriate tier for 24-month period and we'll issue a credit for any discounts missed since the discount was removed. Again, agencies will close out the cases after the initial 90-day period and include a disposition of qualified at the current tier or not income qualified at all. I mentioned this already, but we did decide that we would go with a 24-month term for the energy discount for the bill discount rate and not 12. We discussed those two as options and we also agreed that we would allow the agencies to utilize alternate methods for verifying nonresponsive individuals. For example, I think Lorena advised if they have income and household size from their rental assistance

program application, they could utilize that to verify the customer without them having to contact and provide income and household size, so really income verification. I think that takes us to where we were before last week and this is just the CBO, very high-level agreements.

Zakai, Yochi

It's really helpful to have everything in one document. I'm going to look forward to reviewing it closely when I can have it out in full size on my screen. One thing that I think we had an agreement on that I don't recall seeing here and I could have missed it, was the demographic data reporting and passing that information on to the CAAs.

Tillis, Daniel

That's a great point. We'll need to get that added to the document. Before we send this out, we need to go back and look through some of the minutes where we had some agreements, can anybody else think of anything that might be missing off the top of your head?

Sovak, Teri

Just clarification and I know the decision's been made with this group, but just going back to the additional 30 days as a buffer, accounts bill every day and based on when the company is notified, I'm not sure if this is intended to be up to 30 days. If we're notified and the account could have just billed yesterday or it might be billing again in 20 days, is the expectation that we would have to hold on to that change until after it bills again to get to these 30 extra days of discount? Or is it just up to and then once we're notified basically going to that next billing period?

Tillis, Daniel

I think the reason you're asking the question in part is because we're going to be adding bill discount rates during the month's bill cycle. The 90 days is going to cross bill cycles, so you're going to have changes that are made during the month, regardless of the bill cycle.

Sovak, Teri

It will just have to be whether it gets picked up with the next bill so when that account next bills, can vary based on when we receive this information. It could next bill in a couple of days, for another account, it could next bill in 20 days. I'm just wondering if there's any expectation that if it hasn't met those 30 days after the initial 90 if there's an expectation that it must be held and we go back to a different effective date.

Tillis, Daniel

If I can ask a clarifying question - when the customer bills, if the bill discount rate is there, it's going to give them the discount for the entire month. If the bill discount rate is not there, it's not going to give them any discount at all. There's no partial discount, right?

Sovak, Teri

Right.

Tillis, Daniel

Right. So, it's either a discount or it's nothing. There's no way to partial month a discount since it's the driver of the discount in the system will be gone if it's removed.

Sovak, Teri

That's what I would expect.

Tillis, Daniel

I think it's already going to be complex enough to work these and giving that extra 30 days grace period. I think when we're notified by the agency that the customer didn't respond then we give up to that 120-day period from when that clock started and that's the day we remove it. We're already giving 120 for the customer to respond, basically. If they do respond after that then they get the discount back and they get credits if it's within 180 days from when the clock starts. There must be a clean cutoff date, 120 days, and that's it. Any different thoughts or opinions on that? No, ok. Does anybody have anything that's come to mind that might be missing from our list of agreements? We also agreed that we would utilize federal LIHEAP funds first before applying the EDP, so that's the bill discount rate, so that's probably missing. We can get that added as well. We didn't work out exactly how, but we did agree that the company would put in place processes, whether automated or manual, to utilize any LIHEAP credits, LIHEAP funds, and credits before we apply the bill discount.

Zakai, Yochi

That was a big one for me and I appreciate that you're going to apply that first and then the other part about keeping overlap. I forget if we discussed the agencies are going to want to be able to access pre discount usage to calculate usage for someone who's already on the discount rate, and so we'd want to make sure that Cascade's systems are able to provide both the discount amount and the bills so that the agencies can add those together.

Tillis, Daniel

In our new updated portal you all can access the bills themselves and you can also see 12 months of bills with usage. I believe that you should be able to have access to what you need without seeing the bill discount applied.

Charlee Thompson

I'm going back to the 120-day timeline, I just wanted to say that I appreciate Cascade's consideration and inclusion of the 120-day timeline. I know I brought this up and then it came from Avista's low-income advisory group discussions, so I just wanted to express that appreciation and I think that it will help ensure benefits are getting to the people who need it and giving them grace is a good approach for this first-year program design.

Tillis, Daniel

Maybe we can get this document updated sooner than the minutes and send it out so that you all can see it earlier. There's no reason to wait for the minutes to send it. We'll add that we'll maximize the use of LIHEAP funds or utilize all LIHEAP funds before we apply the discount rate and then we'll get this out to the group and then if you can let us know by the end of the day Friday what your thoughts are so we can move on to trying to get the big blocks of AMP put in place. Any other topics on this document or questions before I stop sharing it? No...Ok. Post income verification process or post qualification income verification process is where we left the last meeting. As I recall the discussion here on you being able to use alternate methods for income verification, there haven't been any decisions made with Avista on that or the other utilities. I suggested potentially we could use medical certificates to exclude customers from the random sample up front, if we wanted to exclude them and just avoid that process altogether for those customers. If that's a good way to define medically fragile or if there's a better way to do it.

Charlee Thompson

Within the past couple weeks since we talked about this last, Avista's BDR subcommittee has had a chance to talk about this and the decision point. At this time we're not going to have a specific path for medically fragile customers and the reasoning behind that was talking through the other safeguards that we've set up in place, which is aligning here with Cascade as well. If people come back and income verify, they get that credit and if they're removed, they have that extra month that leads up to that 120-day timeline again and we have the provisions for extended terms for customers on fixed income. I think it made sense with the CAP agencies in that discussion as we were trying to iron out what details could this be like. Is it necessary, was this an additional provision we wanted to add, and we just ended up with removing that from consideration for this year due to the other safeguards that we talked about. I'm curious if others are still interested in talking about this, but if not then it would be in alignment with the Avista to remove this for this year and keep talking about how we want to ensure these other safeguards and proper outreach as well.

Tillis, Daniel

That is very helpful. Any other input on this is approach and if we should replicate that for Cascade this year or any other ways that we might try to approach the medically fragile topic. I guess I would be comfortable with this approach; see how it goes the first year and then adjust if we feel like there needs to be additional protections in place for someone who's medically fragile or has a medical certificate.

Misty Velasquez Community Action of Skagit

You're saying anyone who has a medical certificate, do they still have to be income eligible?

Tillis, Daniel

What we're talking about is for the post verification process. There had been some discussion with Avista on ways to have additional protections for medically fragile customers, which wasn't fully defined either, how you define that or what those protections might be. As the agency gets that account for verification there are other ways to verify those customers beyond just them having to come in for income or provide income documents.

Misty Velasquez Community Action of Skagit

So a person could technically be over income, but have a medical certificate saying they have something medical wise and still get the discount?

Tillis, Daniel

No. They would still have been qualified through self-attestation by the company and then if they were randomly selected for that month to be verified to have income verified. Is there a way other than just having them come in and provide income to verify they are medically fragile?

Misty Velasquez Community Action of Skagit

So basically a person could go online self-attest stating their income is below the income level, then come in if they get picked for verification, provide documents saying they're medically needy or whatever they need is due to medical reasons and not have to provide income verification?

Tillis, Daniel

So that's not what we're saying right now. That was on the list to discuss - should there be another way for those customers to verify and stay in the program. What Charlee just shared is that Avista has

decided there would not be another way for that to occur and that they would need to follow the same process as non-medically fragile customers. It doesn't mean we can't do that, but that's what Charlee just shared.

Misty Velasquez Community Action of Skagit

OK. I was just curious and just clarifying what I'm what hearing.

Tillis, Daniel

Yeah. If we put nothing in place to be different for those customers than they those medically fragile customers would need to follow the exact same process as every other customer.

Misty Velasquez Community Action of Skagit

I'm good with that.

Tillis, Daniel

Alright. I'm going to move this along here. The last topic that was on the list that we haven't fully discussed is the contacts as far as who does them and when. We talked about Cascade doing the 1st and the agency does every other contact in between there, and then the company would do the final. If the customer's income verified, no other contact needs to happen. The last contact is the agency giving the customer the outcome. If something changes though, they are not qualified or their tier changes, then the last contact would come from the company to send the letter or e-mail stating what happened. Does anyone disagree with that? There are five total contacts from Avista, is that correct - 2 letters from the utility and 3 reminders?

Charlee Thompson

I see six when I'm looking at the slides.

Tillis, Daniel

You're right, I missed that last one there. This is from Avista's slides. The number of touches would be 2 letters from the utility, 3 notices and reminders, and the customer's preferred method for contact and one letter from the agency. Charlee or someone who's close to what's been discussed with Avista, can you walk us through this?

Charlee Thompson

The little dark circles that say 1,2,3,4, that's where I'm looking. That's the very first letter from the utility. It's going to be the notification to a customer that they've been randomly selected for verification. And here's what they must do to complete the process: here are the documents they need to bring, here is the CAP agency's info, etc. 1,2 and 3 are kind of this interim period within that 90 day period and these are the four contacts from the agency and this is where Avista is saying it's important to understand what the customer's preferred choice of communication or contact is, whether that be a letter or e-mail or text or whatever, a phone call, it would be in that form, or at least those 3 notices, the 2nd circle and those notices are saying you've been selected; here's all the information you need to complete the verification process; here's our contact information; here's the date in which you'll be disenrolled. Those 3 notices happen in the letter from the agency. The 3rd circle or 5th communication is the final communication from the agency saying 90 days is up, you will be removed from the program, but reach out if you want to be reenrolled and then that final communication is from the utility or the 4th circle is just after the 120 days have passed. The utility says it's the final notice, you've been disenrolled and you

can reenroll or reach back out if you want to reenroll, here are the steps to provide income documentation because you can only self-attest once in the program year as we decided. I know there was discussion with Avista's CAP agencies as well. And from my understanding from what I've heard from Avista's CAP agencies was that they already do a lot of work to try to reach out to customers when they're trying to get in contact for verification or things like that. All service territory agencies are different, so definitely interested to hear what everyone thinks about this timeline and this number of touch points.

Tillis, Daniel

For step 4, do you know if they are only planning to send a final communication if the customer is disenrolled, or if the customer's tier changes during the process, do you know, are they planning to send a letter or communication for that as well?

Charlee Thompson

That's a good question, and honestly, I don't 100% know that answer. Outreach and marketing are the final two or three topics we have to touch on with the Avista's subcommittee, so that might come up there as well. I want to note that so we do bring that up, that would make sense to me to have some sort of communication to let the customer know that their tier has changed.

Tillis, Daniel

Well, that was helpful for me, I have a much better understanding now. Misty, you made a comment here. There needs to be verification to the customer letting them know the outcome. We're making a change to the account, so I feel that the company should send a letter or communication to let them know that we're making some sort of change. We are doing that in Oregon today as we review the LIHEAP qualified customers that we're getting from the OHCS Oregon housing and Community services organization. If those tiers change based on the income data, we now have access after they qualify for LIHEAP, then we send a letter advising that it has changed. That's where we are getting more real time data starting with April's results. Any questions or feedback on that activity? Is anybody opposed to this process, which is this flow in in words.

Zakai, Yochi

I would say as we get closer to implementation, we should work closely on exactly what the communications from the company look like through the advisory group process.

Tillis, Daniel

That makes sense. We're happy to share what we develop for the communications. For step one and step four, we have some letters like that in place today. We'll work off those and get feedback from this group. I'm not seeing any hands or anything in the chat or anyone off mute so we're going to move on. I really think that takes us through the verification process. I did check Cascade's privacy policy and it does allow us to share customer data with organizations who are required within that agreement to handle the customer data strictly confidentially and for the specific purpose that it's intended for. I would consider our agencies in that category for the purposes of low-income assistance or energy efficiency. It's very specific there on the types of organizations that could be shared with, so I see no reason why we can't share e-mail addresses as part of the process. We don't record the customers preferred communications method right now, but I guess my approach would be if the customer has shared their e-mail address with us and they're opted into our category that would be applicable to energy assistance, then we can assume email is their preferred method. And if you send an e-mail as

one of these three contact points and Step 2 and you don't hear a response, hopefully you would shift to some other contact method. Any questions or input on that?

Roberts, Andrew

I think that at a high level that sounds OK. There are some WACs around information sharing, but as long as it's related to the primary purpose of the company, which I think energy assistance is, it's probably OK.

Tillis, Daniel

You're right, there are some WACs around e-mail, so I will go check those. We worked with that last year on another topic to make sure we were OK.

Roberts, Andrew

I'm trying to find the specific ones I'm thinking about. If I do find them during the meeting, I'll drop them in the chat.

Tillis, Daniel

Is there anything else that anyone thinks we need to discuss related to the post qualification income verification process? No...then I'm going over to the agenda. The next two topics we had if time permitted were income collection as part of the bill discount qualification process. Getting back to that agreements document where we had talked about income collection, we haven't worked out all the details on exactly how that will occur and how it will consider each type of income. It's within the calculation, so that was one item we wanted to get to next and then maximizing federal funding was the other. This doesn't mean that's all the EDP or bill discount rate topics, but those are the two we had up next on deck. I will ask this group if you have any preference to which one, we go to next.

Zakai, Yochi

I think we addressed maximizing federal funding at the beginning of the meeting, so the two points that I brought up, it sounds like we have a little bit of follow up on there, but I think we hit the key points from my perspective there.

Tillis, Daniel

Anybody else have on that topic? Anything you want to talk about today as far as maximizing federal funding, as I mentioned earlier? While it's not going to be easy at all, we are going to put as much automation in place as we can to do that, and then we'll have some manual work probably to make sure we're doing it right and consistently. But we will utilize all LIHEAP funds, including any credits created on accounts before we apply the bill discount rate, to use ratepayer funds to do that. And then, we will make sure, if they don't already, the agencies have access to both billed amounts and usage data on customer accounts. Anything else on maximizing federal funding right now?

Zakai, Yochi

The key thing on the usage was just that it would be the pre-discount amount that would be available to the agencies because when they're enrolling customers in LIHEAP, they're going to enroll them based on their usage or their total bill. And we want to make sure that the bill amount that's provided isn't the discounted amount because if we're calculating a federal benefit based on the discounted amount then we're not maximizing the federal benefit.

Tillis, Daniel

There shouldn't be any reason why the usage is impacted in any way by the discount, but only the bill amount is going to be impacted by the discount.

Misty Velasquez Community Action of Skagit

I'm wondering if because currently we see the bill amount, usage is in kilowatt hours, and we don't use that. We use what is billed to the client. I think that is what Yochi is talking about, that bill amount needs to be prior to the discount for us.

Tillis, Daniel

For what purpose?

Misty Velasquez Community Action of Skagit

To calculate our LIHEAP benefit.

Tillis, Daniel

OK, I thought for some reason you all use usage data for the LIHEAP benefit.

Misty Velasquez Community Action of Skagit

We use usage, but we use the amount of the bill to calculate our LIHEAP benefit.

Tillis, Daniel

OK, so you don't use usage then you use the bill amount.

Misty Velasquez Community Action of Skagit

Correct.

Tillis, Daniel

OK that helps. I don't know why I thought it was usage for some reason.

Zakai, Yochi

Because that's what the agencies call it. It's confusing to people who only know utility lingo.

Tillis, Daniel

I will confirm that we'll somehow make sure that the pre-discount and post-discount bill amounts are available in the portal so.

Sylvia Schaeffer

It's called B&U report. It's from Pacific Power and its billing and usage.

Tillis, Daniel

But just to be sure that when you're doing your calculations for LIHEAP, all you really need is the bill amount, not the actual usage. Is that right?

Lorena Shah

Yes, we put in dollars not therms.

Tillis, Daniel

OK, perfect.

Misty Velasquez Community Action of SkagitAnd Lorena, I'm just curious, when you're using it for weatherization, are you looking at usage?

Lorena Shah

The Con Ed and Weatherization team will look at therms to do modeling and that kind of thing. But we, no, they don't really do anything directly with it beyond that. The bill doesn't play into whether we make a referral or not, because we still use the dollar amount to determine. We still want therms on there for weatherization, it makes it handy. But we don't actually use it in LIHEAP.

Sylvia Schaeffer

For the OLIBA program, they only give a discount once you've reached over 600 kilowatts. So, for us, to explain to the client when they come in, we let them know that. It's good to see the kilowatt usage for us, you don't get the bill discount until you've reached over that 600 kilowatt. And I hope Misty and Lorena can testify to that. It does come in handy to the customer themselves looking at that report when they see it monthly for the 30-day readout to see the kilowatt usage. And then the basic charge for the 600, and anything over that 600 based on the tier Pacific power gives a certain discount on anything over those 600 kilowatts.

Tillis, Daniel

Can you confirm that you all can see the therm usage for Cascade in the portal today? I'm very confident you can, but I haven't looked at it in quite a while. Shannon can confirm for us, or I can check with our customer programs manager on my team who works on the portal and modifications to it. She's also the person I'll work with to make sure that you can somehow see pre-discount bill amount and post-discount bill amount. So, Lorena, thanks for putting that in chat you guys haven't seen it on that, Jen confirmed that they see therm, you see therms and bill dollar amount in in our portal today and there's no reason we would pull therms out of there, so that'll stay for sure. And then we'll just have to figure out access to the two bill amounts, and we don't have any minimum therm usage required to get a discount or to get any arrearage management assistance. We haven't talked about any of that, so I think we should be OK not to worry about that, but again, no reason why we would pull therms out of the portal. We have about 25 minutes left, so maybe we can have a little bit of discussion on the income collection. I want to bring one quick topic that just popped into my mind, for our next full group advisory group meeting, which should be on May 17th, I was thinking that would be an appropriate time, especially if we get some big decisions made on AMP, to provide that group with a comprehensive update on where we're at on the decisions we've all made so far and get their input and feedback before we move on too much farther. Does everyone agree that that would be a good time to do that? Alright, got a thumbs up from Sylvia. Assuming everyone else is ok with it. Ok, back to the topics, I think what we recommended was that we asked the customer for their gross income for the prior month, let's see if anybody has a different recollection of that discussion, or if that's where we left it.

Zakai, Yochi

Where we landed with PSE and Avista on this, I think, is instructive, they're going to look at the one month first and then if one-month doesn't qualify the customer, then I believe they look at three months and then if three months doesn't qualify the customer, they'll look at 12 months. I don't have those exact numbers in front of me, but that's the basic process and other folks can correct me if I didn't get that exactly right. I think doing something like that and following that process makes sense. Lorena

put in the chat 1,3,12. And I think we agreed that we were going to follow LIHEAP, so I think for consistency that would be helpful.

Tillis, Daniel

Consistent with LIHEAP, I hope you all can answer this question, in a lot of cases when Cascade gets into these conversations, it's going to be more proactive than a customer calling the agency for help, but the customer may just be calling to tell us that they need to set up a payment plan or payment arrangement, or share some other insight on the struggles they're having paying bills and our agents are going to be trained to go into that conversation about the options we have available for assistance. I think in those situations, it's reasonable for a customer to be able to pretty quickly provide their most recent month's income to help with that qualification process. Where I have a little concern is if that doesn't qualify the customer and we ask for three months and then 12 months, are they going to be able to give us that on that phone call or are they going to have to call back, which is OK if they have to call back, but any thoughts on how often someone would immediately have 3 or 12 months of income to share?

Lorena Shah

You're probably right to be concerned about that. I think most of our folks are qualifying on one month these days, so hopefully it won't be a lot, but if what they have available that day is not quite the right months that we need to look at, then we just send them out that 10-day notice to provide documentation, if we're talking about LIHEAP. Over the phone kind of immediate applications, especially when they weren't expecting to be offered a service like the BDR or an AMP because they were calling to get a payment plan, it might be a little trickier for people. Generally, a lot of people are going to be guessing on their income anyway, not everyone's going to have their pay stubs and be filling this out perfectly. You're going to run into this sort of pending application status for those folks. Jenn's adding in the chat another tool we use when people can't get their documentation, or they've lost pay stubs that kind of thing can work.

Tillis, Daniel

We'll go with that approach. We're not going to have our agents stay on the phone for 10 minutes while the customer tries to find that information. We would tell the customer to please find that and call us back. It's important that you call us so we can try to qualify you with the additional income information. If they're struggling with their bill, they're probably not seeing an increase in their income recently, but I guess it's possible that could happen.

Lorena Shah

In those events where somebody does start an application with the utility and for this reason or for another that application will be in your system like a pended application, or would the customer service rep not start one until they called back and had exact information?

Tillis, Daniel

If they start with the one month and the customer doesn't qualify, then there's not a pending application that remains in our system, but the CSR or credit rep should note on the account that they attempted to qualify the customer and they didn't qualify. The next agent, when the customer called back, would see that, and hopefully immediately shift to three months, knowing that they see that note.

Lorena Shah

So there won't be any issue if we've started an app over here because they ended up coming in and there's already one in process because you just wouldn't start one. They would just call back and start fresh.

Tillis, Daniel

We don't have the same application type process that you all have. We use a calculator much like what you're using for WEAF today that was provided for this program year, so it'd be very similar to that, and that's not saved anywhere, it doesn't connect to CC&B. Once a customer qualifies using that calculator, our agents use something called a communications app where they basically complete a form that currently goes to Shannon Steed. She will review and then in this case, see what we've pledged for the Oregon energy discount program and the bill discount rate so it is applied to the account. Our goal is to automate that without Shannon's manual intervention, but that's the way the process works today. The calculator gives what the discount should be, the form is filled out with the customer's information, the percent discount, and OLIBA and AMP assistance that should be applied. That goes to Shannon, and she reviews and does the work in CC&B. Jen's asking in chat if we will know what month they're qualifying when pulled for an audit. That's a great question. I have to see if there's a way for us to provide that, it doesn't exist on that form I mentioned earlier that ends up with Shannon and saved in our database. So when we look at our income window, here are the timeline interval periods. We look at these different types of income and know you all treat them a little differently and this is the gross deduction info on the far right. Is the desire from this group is for the company is to somehow discount those as these types of income as well in our qualification process?

Misty Velasquez Community Action of Skagit

I would think that yes, in order to qualify them, if you're doing the deductions the way that LIHEAP does the deductions you would need to have your CNG staff take off those deductions if they're giving you the gross amount.

Tillis, Daniel

OK. Anybody feel differently about that? We'll have to figure out how to do that in our calculator and how to collect the different types of income today, we don't do that today. It's just, what was your gross income last month and that's what's plugged into the calculator.

Misty Velasquez Community Action of Skagit

I would imagine there's going to be possibly some big differences when it comes to verification and people changing tiers at that point.

Tillis, Daniel

Whatever process we decide how we collect the income data would need to be the same process the agencies follow for verification. So, if we decided not to discount those income types, for example, then when you verify you would not discount those income types for the purposes of the company program, not LIHEAP, but for the company programs. I'm not saying that's what we're going to do, I'm just saying that those two things have to link.

Misty Velasquez Community Action of Skagit

So Lorena and anyone else, have we talked about how we are taking those discounts?

Lorena Shah

Yes, Misty, that's correct. They're going to set up their online application in a way that does separate out and includes a check box for all the different types of income that the household has.

Misty Velasquez Community Action of Skagit (Guest)

So for consistency within agency staff so that they're not having to remember 3 different ways of doing verification and different program wise, I would say for consistency I would vote to take the discounts.

Tillis, Daniel

And just for the record, that makes it inconsistent for Cascade employees because we don't do that for Oregon and our Cascade employees take calls from both states.

Lorena Shah

So for Oregon, you just get basically one field, one number that goes in there and that's last month's total gross income for the household.

Tillis, Daniel

Correct.

Lorena Shah

I can appreciate both of our dilemmas here. There's a part of me that's like it's more for us to manage and Misty and Jen and Marie feel free to, Sylvia, feel free to push back on me on this, but also there's a part of me that kind of likes trying it a couple different ways, like having some differences between the two utilities to kind of test over time what does make sense so we can adjust.

Misty Velasquez Community Action of Skagit

Here's my concern, Lorena. If you're doing that and we are automatically enrolling people with LIHEAP amounts, those have the discounted price or discounted amounts.

Lorena Shah

Right. Well, maybe that's a bonus for coming to the agency. You get put into a more beneficial tier because we're looking at your income in a more nuanced fashion. Yeah, it's a dilemma because I can totally understand where the utility is coming from and not wanting to manage to having things done two totally different ways and, we're looking at two to three different ways, so not quite sure what the solution is there.

Tillis, Daniel

There's a lot of things we talked about through these decisions, not only are they different for our team members, but they're going to add a lot of time to these discussions and we're going to have to figure out internally how we handle that.

Misty Velasquez Community Action of Skagit

Are you using gross or net because the reason we take those percentages off is because they pay taxes and stuff out of there. Their gross income and those percentages are supposed to offset that, so are you using going to use net income after taxes?

Tillis, Daniel

I'm just trying to check something real quick so I don't give you the wrong answer. I've been saying gross, but since you asked the question, it makes me want to confirm. So, Lorena, I'll answer your

questions while I'm looking for this. The plan is both, however the online applications won't be automated, showing you qualify and here's what you qualified for. It will be you're submitting a form and then you're going to get a call back from one of our customer support reps who will take the customer through the same qualification process that an inbound CSR would have taken the customer through on the phone. So, essentially the same process if we if we decide to collect the income, though, we'll try to set up the online form the same way, so that when that customer support rep gets that form to call the customer back or to call the customer, they'll be able to use the calculator up front. Then it'll just make them more efficient in the discussion with the customer. I can't find what I'm looking for, which makes no sense, so I'm going to have to say that I will answer that question before our next meeting. We're starting to run out of time, so I think we're going to have to decide on how we approach income collection as far as the two options we've talked about, I'd say almost three options now that we've talked about the difference between gross and net. My recommendation right now would pick up next week, try to finalize any decisions we need to make around this and then I will send you all the other document that we reviewed with the key decisions and agreements hopefully by sometime tomorrow morning, if you could let me know by the end of the day Friday if you think we are far enough along with EDP to pause those discussions and move to AMP. Try to get the big decisions made for AMP and then we can circle back to make the final decisions on both programs as far as the fine details that we're all going to have to agree to and develop and document. Jen made a comment in chat that the standardized would make sense, standardize net across all income types and I think that's fair, and if we're not using that today I would prefer to shift to using that, and just asking for that one income data point versus all these different income data points. I appreciate that input and that's why I said, I think there's three options on the table really; one is just collect gross, one is just collect net and then the other is to collect every type and apply the gross deduction that you all apply through the LIHEAP process. I think we have people in favor of all three so it's going to be a fun discussion next week.

****Dan confirmed that we currently use net income in Oregon.****

Misty Velasquez Community Action of Skagit

You mentioned if you go with one income point on the application, are you going to have a little check box so that they can mark off what kind of income they have?

Tillis, Daniel

I think the online application that someone mentioned in one of our discussions that's what PSE is planning to do. Chris is no longer on the on the meeting, but for the internal calculator, we would either have drop downs for our agents to select and then put the amounts or check boxes or maybe just open fields for them to enter for that income type next to it. He's the expert in that.

Misty Velasquez Community Action of Skagit

I'm just curious on that because when it comes to us, if we get it for verification, we want to have something to go off of for the kind of income that they specified. Tillis, Daniel

I'll just make a note of that for the next week's agenda, when we get some idea of whether we're going to move to AMP next week if we're not going to move to AMP, then the other part I would like is what other topics besides income collection you would want to discuss related to EDP next week. If your opinion is we can't move to AMP yet, please let me know what else you would like to discuss related to EDP so I can create the agenda for next week if we're not going to move to AMP. That's funny, Lorena

says we can't even get agreement amongst the agencies. Alright, thanks everyone it's been a great discussion, hopefully you're not tired of hearing me talk - I'm open to others talking more than me next week.

Charlee Thompson

Thanks, Dan. You did a good job. It was a good discussion.

Ideas and requests discussed for income collection:

Start with 1 month, if not qualified, go to 3 months, if not qualified, go to 12 months.

****Will agencies know what month they are qualifying when pulled for audit? and if 3 mo or 12 mo is used?***

****Agencies would like to know income types regardless of collection method**** Dan confirmed that income types are part of the additional data CNGC will collect and provide to the agencies.

Gross Income Type	Types of Income	Gross Deduction
Fixed Income, not taxed	SSA, SSDI, SSI, Pension, Unemployment, VA	0%
Fixed income, taxed	SSA, SSDI, Pension, Unemployment	10%
Earned Income, taxed	Regular earnings from a job	20%
Self-Employment	1040 or Any type of self-employment that has costs associated with it	50%
Other Cash Income	TANF, Child Support	0%