

# WEAF Advisory Group

Agenda

July 5, 2023

**KEY TOPICS: Process walk-throughs and joint communications plan**

**GOALS FOR MEETING OUTCOME: Walk-through processes to discuss details, start process of developing joint communications plan**

## **Agreements from 7/5/23 Meeting:**

**Income verification process** – should agencies start a new application? During initial income verification attempts agencies will ask the customer to verify what they provided initially via self-declaration. But after a customer is removed from the discount rate the agencies will start a new application and require customers to provide their current income data.

If a customer verifies their income at the discount tier determined through self-declaration the company will keep the customer on the current discount tier without extending the term. If a customer qualifies for a different tier, then the company will remove the current discount tier and add the new discount tier with a new 24 month term.

### 1. End to End application process walk-through – Dan

Tillis, Daniel

So I thought this would be a good meeting if we have enough folks to review the flow of how the programs will work and address any questions. It will also help create our training and process documentation. We're continuing to increase our internal activity for outlining all of the processes and training, we don't have to answer every question today, but some of it would be will be helpful. I'm going to share the flow chart that we looked at several weeks ago, we all agreed to the applications for the CARES program, both the bill discount rate and the arrearage relief pledges will go through the agencies for applications. So, if a customer calls the company and expresses a need for assistance, or we identify a potential need for assistance for them through verbal or nonverbal cues i.e., stating they can't pay the bill or seeing on their account that they're significantly behind and have a past due balance, and are consistently behind, we can make that proactive inquiry by asking if they're interested in potentially receiving bill pay assistance and then the company will refer that customer to the appropriate agency. This would be based on their location, we would have discussions about a time payment arrangement, but also make that referral to the agency, that's really the company's involvement on the front end and then either by referral from the company or through other outreach by the agencies or whatever that might be, this flow starts where the agencies would get involved. So, in this case, customer calls an agency and if it's a Cascade customer, the agency will advise the customer they can attempt to qualify for the CARES program with the bill discount rate being the lead product I would say. They can utilize self-declaration of their income and household size and the agency will go through the process to collect

income and household size data from the customer and then use that table we've all looked at, for adjusting those incomes, using the same process the agencies utilized today for LIHEAP and at the same time, the agency will also advise the customer that they can potentially qualify for LIHEAP if they're eligible, if there's already an identified citizenship concern, the agency will discuss scheduling a LIHEAP appointment with the customer.

Going up to our next step, if the customer qualifies for the bill discount rate, the agency will submit that via the CNG assist portal at the same time, if the customer's LIHEAP eligible based on the that initial conversation, the agency will also schedule an appointment with the customer and put the tier of bill discount rate that the customer qualified for as well as the fact that the customer has an appointment to potentially qualify for LIHEAP. Those actions in the portal will be the company's notification that the customer is getting help or applying for LIHEAP and we will pause the collections/disconnect process at that time. As far as sending notices to these customers, we have had some internal discussion about that since our meeting and we're looking at what our options might be, but at this time we haven't changed that decision as we're not sure if we have an option to adjust that at this point, but we'll keep this group updated on that. We'll probably have that topic on the agenda here in the next couple of weeks, maybe a month at the most as we continue to work through our options. So, at that point the customer has qualified for bill discount rate based on the income and household size collection via self-declaration and scheduled a LIHEAP appointment with the agency and that information has been provided to the company via the portal. If the customer qualified for the bill discount rate, but is not LIHEAP eligible; 2 main reasons would be citizenship or FPL is 151% or higher, the agency would then see if the customer has a past due balance and shift to arrearage relief qualification and that would be via self-declaration as well. So, same process essentially just might find that the customer, if it's a citizenship issue, their income could be anywhere in the zero to 200% range for FPL and up to 80% for AMI, they would qualify for whatever tier that is. If they're in that 151 to 200% FPL tier then through self-declaration they could qualify for Tier 5, if they are AMP qualified they would also receive a discount rate and the agencies would submit that information again via the assist portal.

We also discussed while the agencies are having those discussions about bill discount rate and AMP, if the AMP doesn't cover the full past due balance, then the agencies will also have a budget discussion with the customer to talk about what time payment arrangement they might want to schedule and really set that up for the customer verbally, and then submit that in the portal as well for our company to set that up in our in our system and confirm the customer is able to pay that remaining balance off over the course of up to 24 months as we've discussed. If a customer doesn't qualify at all in any of these steps, then the process ends after the income and household size data is collected, other than a LIHEAP appointment. Any questions or comments or concerns on that the top section?

Jumping down to what happens actually at the LIHEAP appointment since the bill discount rate will already be on the account, really, the agency just goes into the LIHEAP qualification process they follow today. If they qualify for LIHEAP and that covers all of their arrears, then the agency submits the LIHEAP pledge in the assist portal and that wraps things up. If they qualified and their arrears are not fully covered at that point, then the agency will then shift to seeing what arrears relief tier the customer would qualify for based on their verified income, then both the LIHEAP and the arrears relief pledge would need to be submitted via the portal. If they're not LIHEAP qualified, during that

appointment, the agency would see if the customer would qualify for the arrearage relief via self-declaration. If they do, then that would be submitted via the portal as well. If they don't have a past due balance, then that would end the process at that point as well. Am I missing anything?

Charlee Thompson

I was going to say I think that made sense to me than a few weeks ago, so thanks for running through it.

Tillis, Daniel

You're welcome. Shannon, Teri, and team can probably use this flow to help build out the full program document and training for the agencies.

2. Income Verification process walk-through – Dan
  - a. Open a new application?

So, the next topic on the agenda is income verification. It's going to walk through that overall process outline a little bit as well, but I think there's probably 3 different directions we could go on whether or not to open a new application, we could get a consensus agreement on what that process should be; whether or not during income verification and this would include just customers who self-declared their income and household size and did not have a follow up LIHEAP appointment to go through that income verified qualification process. That would be the pull of customers who are then randomly selected each month to be provided to the agencies for income verification, and we did decide that would start in November with our first month of October qualifications and then the agencies had a question several weeks ago on whether or not you should open a new application to go through the income verification process or whether it should be working off of the old application. I think there was a lot of interest in starting a new application, so we could either agree that's the process each agency is going to follow, or we could agree that you should work off the initial application where you could do it however you want to at the agency level as long as you're getting income verification from the customer in some way other than self-declaration.

Jen Rightsell

I just wanted to say that if I can remember correctly, I thought the agencies said we would be fine working off of the same information from the October application. If they're found to be denied for not providing any information we would keep that application denied and then start a new application if they were to comply later.

Tillis, Daniel

So, if I'm understanding that correctly, what you're saying is that you would work off of the income and household size data they provided in the original application, via self-declaration. But if they can't, then you would open a new application to have them provide you updated information you can verify and base their qualification on that updated application and information, is that right?

Jen Rightsell

Yes. So basically, if they didn't provide any information and then they get taken off of BDR, they would have to reapply for it with a new application, they wouldn't be able to go back and say, OK,

they got a denial, they got taken off BDR and then they get the notice that they've been taken off here's my pay stub from October or whenever it was, we would have him at that point start over and not use the same information they would have to start a new application once they got taken off of it for not complying I mean.

Tillis, Daniel

OK, so that makes sense. So initial income verification attempts will be asking the customer to verify what they provided initially, but after they're removed, they need to start a new application to provide their current income data.

Jen Rightsell

Right. And they would have to income verify at that point or they could also self-declare again in the future if they were picked for verification and did not follow through.

Tillis, Daniel

And they can only self-declare one time per program year so if it's in the same program year, they would have to go through income verification. But if it's in the new program here, they could self-declare again.

Jen Rightsell

Yeah, sounds good.

Tillis, Daniel

That's good clarification. I did not understand that to have been the previous discussion, so that's helpful. Does anyone disagree with what Jen just went through there as far as using the information that the customer provided on their initial application via self-declaration, using that during the four month really, but three month communicated to the customer, income verification period and if customer verifies that then they stay on the discount. If they don't, then they get removed after 120 days total and then if they want to apply again then you start a new application with using the income verification process if it's in the same program year. Everybody good with that? I'm not seeing any comments or questions. Charlee says it makes sense.

Tillis, Daniel

If somebody has the document we used for the discussion on the income verification process, the Avista flow we worked off of, feel free to share it and we'll work off that. That's what I was planning to work off of, but I'm not able to find it so I'll walk through my understanding of what we've agreed to for our income verification process post self-declaration of income and household size. So, for customers who self-declare their income and household size to the agencies for qualifying for CARES and those who don't have a follow up LIHEAP appointment, after that self-declared verification process if they have that LIHEAP appointment scheduled and they show up for that, then that is the income verification process. But, if they don't schedule an appointment, then they'll be part of the pool for random selection. We will randomly select 5% from that pool each month, that 5% is at the agency level. The plan is that we will pull those the month after, so October program start in early November we randomly select that 5%. The plan is to provide those accounts to the agencies via the assist portal. We might have to start by working off of spreadsheets that would be shared via our Secure transfer portal, if we don't have it automated by then. And then the agencies can work off of those and get them back to us securely for processing. We would provide those accounts to the

agencies and at the same time the company would send the first communication to customers advising that they've been selected for income verification, after they've qualified for the CARES program via self-declaration, that kicks off the timeline of that 90-day income verification period and from that point, the agencies take over the communication and then there's four touch points from the agencies during that time to the customer. The company is not going to be prescriptive on what those should be, the agencies really have the flexibility to try to reach out the customers in multiple ways and the best way they feel is appropriate. From there, the agencies make calls, send letters and emails. We're going to try to provide email if the customer has opted into energy assistance emails. We did agree that it's a requirement that customers agree to have their information shared with the agencies in order to qualify for the CARES program, so customers are opting into allowing the company to provide that information, but really you're having that conversation with them about the income verification anyway. That's changed a little bit since we had that initial agreement, but we share information with the agencies already and it's part of the requirement for customers to allow for that to happen. After the end of that 90-day period that the agencies will start attempting to verify income and if the customer has not contacted the agency at all or has not provided income verification, then we'll give them a 30-day grace period, so a total of 120 days from initial selection of random income verification. If after that, within that 30-day period the customer contacts the agency to provide verification, they'll remain on the program. If they don't, then after that 120-day period the customer will be removed from the bill discount rate program, and we'll have to go through income verification with the agencies if they want to be added back in. If they do go through that income verification within roughly 180 days total, then the company will add them back at the income verified Tier and provide the customer with a credit for any discounts they missed during that period they were removed. So, that's if the customer responds and verifies at the same tier, then they'll remain of that tier. If they verify and the tier is higher or lower than the agencies will provide that information to the company and the company will adjust the customers' bill discount rate tier. If the customer is removed from the program or they're tier changes, then the company will send notification of the removal from the program or discount change. If the customer verifies at the tier they were originally placed in, then the agency will just advise the customer of that, and no additional communication will be sent.

I don't know if I said this or not, but if we have the assist portal ready by the time we start the income verification process, then the agencies will submit the outcome of the verification attempts to the company for each customer via the portal. If not, we will use spreadsheets. Any questions, comments.

Charlee Thompson

I have a quick question, Dan. When customers come in and they qualify either for the tier that they declared or for different tier we did agree that their term would be extended, correct?

Tillis, Daniel

If they verify at their current tier, I don't think we agreed that their term would be extended, but if they verify at a new tier, I think we did agree their term would be extended.

Charlee Thompson

Thank you.

Tillis, Daniel

The reason we weren't going to extend it, if they verify for the existing tiers that doesn't require us to touch their account at all. But if they verified for a new tier and then we have to change the discount percentage and then we could just adjust the end date at that time.

Charlee Thompson

I'll go back and look at my notes on that. This program versus Avista's NPS, I think all kinds of have slightly different decisions on this particular topic. If anyone else remembers that differently, let me know.

Tillis, Daniel

We can open it up right now and see if that's the decision we want to stick with and it's a pretty small amount of customers who are going through the process so if we wanted to take those who did complete the verification process and renew their end date we could, Teri, I don't know if you feel like that would create any issues with the discount and if it's going to get us back into that prorated conversation or anything like that. But what are your thoughts there on billing issues that that could create?

Sovak, Teri

Billing issues just to extend the program if the customers verify at a new tier?

Tillis, Daniel

No, if they verify the new tier, I think we've agreed that we'll just remove the old tier and add the new tier with the new end date. If they verify the tier they initially qualify for and then I think the thought process there is, they're going through the income verification process so they've really qualified again, should we give them a full 24 months from that period instead of whatever is left of the 24 months?

Sovak, Teri

I don't think that there would necessarily be a billing issue other than having to touch the account when really they've qualified for what they said in the beginning through self-declaration. I don't think there would be a billing issue, it would just be a matter of is it necessary to touch that account again.

Charlee Thompson

That's good. I'm glad that there's not a billing issue. I lean towards touching the account again and extending it, even though that would be work to touch the account again. I think that's what Avista and PSE's design is. Some customers might be selected for random verification at the very end of their term and if they have to go through the income verification process like one month or two months or something before they have to come back into re-attest and go through a potential verification again soon after that, then it can be a burden on those customers. So, extending it when they do verify at that time would eliminate that potential burden. I wish Yochi and Corey were here to give some thoughts on that, but I'm definitely very curious for CAP agency thoughts on that as well.

Tillis, Daniel

Any thoughts from the agencies?

Jen Rightsell

If they qualify for a new tier that's different from when they originally applied, then yes, you update that and extend. I have no comment either way of if they qualified for the same tier, whether or not that should be like started over and extended, that will be up to Cascade I guess.

Mickelson, Christopher

Dan, can you remind me that the game plan is we pick 5% out of the pool from the previous month so these customers would only have been on the program for a month, is that correct? So, we won't really fall into a situation that Charlee brought up where they could be toward the end of their 24-month program.

Tillis, Daniel

Correct.

Mickelson, Christopher

So, in that instance, I don't think touching the account makes sense since it's only been a month. Extending it a month really doesn't make a lot of sense.

Tillis, Daniel

Yeah, more than likely the furthest away from their initial qualification that they might be out is about four months, that's if they wait until the very end to respond.

Mickelson, Christopher

Either way it's fairly early from when they sign up.

Tillis, Daniel

Correct.

Mickelson, Christopher

Personally, I would vote against touching the account again unless we find out their new income puts them in a different tier other than what they're currently getting.

Sovak, Teri

Just to piggyback off of what Chris was saying, my only concern to do it at the time that they qualify for a new tier would be even though it's not a billing issue, it just becomes more complex and difficult to explain a two-year stint on this. I just feel like it'd be difficult to explain or ever really know from when they started, why it extended, it could just involve a lot of research.

Tillis, Daniel

I think it's going to be really interesting as we get into this to see what percent of customers are requalifying every year anyways, based on getting LIHEAP every year, even state LIHEAP now, potentially as that program rolls out they will automatically re-enroll for 24 more months from that that point. We're not there yet in Oregon so we don't have Oregon to look at to say what percentage of the time this is happening, but we will be in about 3 months or so we'll start getting some insight there.

Charlee Thompson

I think that makes sense, thanks for pointing that out.

Tillis, Daniel

Anything else on the income verification process?

### 3. Initial discuss on joint communications plan – Dan

The last topic on the agenda, other than meeting topics for next week's meeting is the initial touch point on the joint communications plan and I don't know if we have enough folks on the meeting today to go into too much detail on this, but to get to the items for this week I looked through the presentation that Jennifer has created and we've worked off of in several meetings, and I looked at the pending items that we haven't discussed much yet and this is one of those that is on our list to work through. Charlee, any insight on anything the other utilities have discussed on this?

Charlee Thompson

Avista is the one that has gotten through this, PSE still has not, but what we started discussing with Avista was in the annual process of CARES or BDR, where would we want to have similar or be on the same page between the company and the agencies. One of those things was every year before the energy assistance season really gets started is having similar communications between the agencies and the company like a program announcement such as here's what's coming and the details of CARES and how to apply, when to apply and how it works. So just having the same communication between the two entities and far enough in advance of a new assistance season, but kind of being able to have a follow up. Any additional announcements about program design changes or how to enroll in the program and things like that should be the same between the two. Maybe FAQ's like if they're asking the basic questions such as what does Cascade and local Community Action agency do with customer income and household information, does being on the program mean that I can no longer get other energy assistance or you kind of like those basic questions. What happens after I sign up? I think that list of FAQ's is where we're at right now with Avista, the emphasis on having the same answer and using the same terminology, because I think there's been a few points where we've talked about in this group and others said we'll use this word and not that word. And FAQ's that are specific to Cascade about the customer portal or from the customer side of things, what will they see? I think we have room here with Cascade to build off of that, but also start diving into what else we think is needed for a specific Cascade and agency communications plan.

Tillis, Daniel

Thank you, that's really helpful. We really haven't thought much about FAQ's, but we'll have to start putting together a list of those.

Charlee Thompson

Now that I'm thinking about that there's the customer facing FAQ and there's also the agency and company side answers to the media about the inquiries of fraud, having our answers ready and similar or the same for those types of questions as well the internal questions.

Tillis, Daniel

I know you had mentioned we address the concerns from other customers about the self-declaration process and the potential for fraud and good use of customer funds, ratepayer funds, I



recall Yochi wanting to have an upfront joint communications plan as well as far as how we communicate the launch of the new program to Cascade customers in Washington.

#### 4. Topics for 7/12 Meeting – All

So, I'm thinking maybe jumping ahead to the next item is maybe we keep the Joint Communications plan discussion on the agenda as the primary topic for next week's meeting and then I was thinking another topic could be KPI. Reporting is one of the other areas where we still need to discuss and work out and that's probably enough for a meeting. I think on the Joint communications plan, Charlee, maybe if ahead of next week's meeting, you could talk to Yochi and Corey and anyone else who should be involved in the conversation and just come to the meeting with the group's recommendations on what all you'd like to see in a joint communications plan, both the initial communication and customer communication and FAQs and all of those things that kind of want to see as part of the communications plan. I think we can work from there. I'm not trying to cut this discussion short, but also if we're not ready to discuss it today in depth, I don't want to drag it out either. Does anybody else have any thoughts on the Joint Communications plan? All right, I think we have our topics for next week. If you haven't seen Jennifer Gross's email from this morning, we did submit the filing on Friday for the program and deferral and everything else so that is a great milestone to have achieved together and on time which is great, now we just wait until we get action from Commission staff and on the agenda to hopefully get approval quickly. I mentioned earlier that we're continuing to get more serious about our planning internally, now that we've gotten to this point of having the program fully designed and we have a meeting in the next several days to bring everybody who's going to be involved together to lay out everything that we have to get done between now and October 1<sup>st</sup>, hopefully sooner for a lot of the items. I don't see anything that presents any risk for us to miss that date at this point and if something does present a risk, we will find a work around for it until we get it taken care of. Thanks everyone for all the work you've done on this, I think we're in a pretty good place. Any other comments or questions or topics for today? Alright, have a great rest of your day and we'll talk on the 12th.