

# **Washington Low-Income Rate Assistance Program (LIRAP)**

## **Annual Summary Report**

**For the Program Period October 2023 – September 2024**

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# LIRAP Overview & Background

## Background

Avista Utilities' (Avista or the Company) Low-Income Rate Assistance Program (LIRAP or Program) was approved by the Washington Utilities and Transportation Commission (UTC or Commission) in 2001 and collects funding through electric and natural gas tariff surcharges on Schedules 92 and 192. These funds are distributed to eligible Avista households by Avista, as well as its six partner Community Action Agencies and the Spokane Tribe of Indians (collectively, Agencies or CAAs).<sup>1</sup> LIRAP, like the federally sponsored and State administered Low Income Home Energy Assistance Program (LIHEAP), can help a household pay ongoing energy costs, avoid having its utilities shut off, or help reestablish service if a disruption due to nonpayment occurs. This document represents the LIRAP Annual Summary Report (Report) for the 2023-2024 Program Year (PY) and is intended to provide a summary of the Company's LIRAP activities for the given Program Year including, but not limited to, overall Program results; Program implementation; customer impacts; Program modifications; and outreach and engagement. With a full year of experience with the "new" LIRAP structure (as further detailed herein) now completed, this Report is also Avista's first opportunity to relay its resulting outcomes, observations, and lessons learned as it continues to refine and improve its Program to best suit the needs of the households it serves.

As discussed in Avista's 2021-2022 Report,<sup>2</sup> the enactment of the Clean Energy Transformation Act (CETA) in 2019<sup>3</sup> and the introduction of Senate Bill 5295 (SB 5295) in 2021<sup>4</sup> brought with them transformational change for LIRAP, which was only amplified by the continued hardship faced by many customers due to the COVID-19 health and economic crisis. These events introduced the opportunity to design and develop a new

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<sup>1</sup> The seven Agencies serving Avista's service territory include Spokane Neighborhood Action Partners (SNAP), Rural Resources, Opportunities Industrialization Center (OIC) of Washington, Community Action Center – Whitman County, Community Action Partnership – Asotin County, Washington Gorge Action Programs, and the Spokane Tribe of Indians.

<sup>2</sup> Docket Nos. UE-010436 and UG-010437, *2021-2022 LIRAP Annual Summary Report*, as revised January 6, 2023; <https://apiproxy.utc.wa.gov/cases/GetDocument?docID=105&year=2001&docketNumber=010436>.

<sup>3</sup> Specifically, Section 12 of CETA (codified as RCW 19.405.120).

<sup>4</sup> Codified as RCW 80.28.425.

LIRAP that would not only meet the latest legislative mandates but would also better serve customers in the pursuit of energy burden<sup>5</sup> reduction. These Program design changes were noted within last year's LIRAP Report<sup>6</sup> and are further detailed within the *LIRAP Overview* section of this 2023-2024 Report.

Lastly, during the preparation of this Report, Avista's 2024 General Rate Case (GRC) concluded with the Commission's Final Order 08 in Docket Nos. UE-240006 & UG-240007 (*Consolidated*).<sup>7</sup> In its Order, the Commission noted:

"...as set forth in Avista's rebuttal testimony, we expect the revisions in the Company's annual LIRAP reports to include:

- 1) An assessment of Energy Burden for customers participating in the MED program, and an analysis of the revised program structure that became effective October 1, 2023.
- 2) Updated saturation rates for low-income customers by fuel type, (beginning in early 2026);
- 3) Updated reporting metrics that identify arrearage and disconnection demographics, customer participation geography, demographics, data and trends, including impacts to named communities; and
- 4) An analysis of the revised program structure that became effective October 1, 2023."<sup>8</sup>

With this being the first Report since the issuance of the Order – and, notably, the contents of this Report having been created, for the most part, prior to the Order – the Company would like to highlight that it has already significantly complied with these requirements, including within this Report two of the above provisions. Avista will continue to make progress in 2025, as directed, to provide the remaining revisions in future LIRAP reporting.<sup>9</sup>

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<sup>5</sup> Per RCW 19.405.020(17), "energy burden" means the share of annual household income used to pay annual home energy bills.

<sup>6</sup> Docket Nos. UE-010436 et. al., *2022-2023 LIRAP Annual Summary Report*, pgs. 18-20.  
<https://apiproxy.utc.wa.gov/cases/GetDocument?docID=110&year=2001&docketNumber=010436>.

<sup>7</sup> Issued December 20, 2024, with a Corrected Order issued on December 23, 2024.

<sup>8</sup> Docket Nos. UE-240006 & UG-240007 (*Consolidated*), Final Order 08 at 86:325.

<sup>9</sup> Requirement 2, as noted, is not required to begin until early 2026, and requirement 3, as provided within the corresponding footnote within the Commission's order, references the Company's Rebuttal Testimony, Bonfield, Exh. SJB-5T at 27:20-24, which states: *Avista is open to including such an assessment within its existing reporting structure via its LIRAP Report, Disconnection Reduction Report, or some combination of the reports listed previously within my testimony. Future conversations with the EAAG would be warranted to help determine the best methodology and level of detail needed.*

## Purpose & Goals

To assist customers in their ability to maintain affordable energy services, Avista focuses on actions and programs in several areas, including:

- advocacy for, and support of, programs providing direct financial assistance,
- low-income and senior outreach programs,
- energy efficiency and energy conservation education, and
- support of community programs or services that improve the affordability of basic costs of living for resource-constrained customers.

The Company also places significant emphasis on the equitable distribution of resources, benefits, and offerings in these areas. As a whole, LIRAP not only exemplifies equity by addressing the individual energy burden of a household, but also directly contributes to each affordability consideration listed above by providing direct financial assistance as well as outreach and connection to complementary programs such as energy efficiency or housing assistance. As memorialized in the Commission's Final Order 07 in Docket Nos. UE-140188 and UG-140189 (*Consolidated*),<sup>10</sup> Avista's LIRAP is driven by the following goals:

1. keep customers connected to energy service,
2. provide assistance to more customers than are currently served by the Program,
3. lower the energy burden of LIRAP participants, and
4. ensure that LIRAP has appropriate data to assess Program effectiveness.

Avista remains committed to these goals, particularly for its customers most affected by rising energy prices, including low-income individuals and families, seniors, disabled and vulnerable customers.

## LIRAP Overview

The 2023-2024 Program Year represents a culmination of the transformational years and resulting Program design that followed CETA and SB 5295. Effective October 1, 2023, Avista's LIRAP transitioned from a grant-based Program to an income-based bill

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<sup>10</sup> See Final Order 07, *Granting Joint Petition and Approving Modifications and Additions to Avista's Low Income Rate Assistance Program Compliance Filing*, issued June 25, 2015.

discount model for all eligible low-income customers,<sup>11</sup> coupled with the continuation and expansion of offerings intended to address customers past due balances, or arrearages. New LIRAP provisions were also introduced, intended to decrease existing barriers customers may experience in pursuing or receiving assistance, such as joint administration of the Program and customer self-declaration of income, as further discussed in the *Joint Administration* and *Self-Attestation* sections below.<sup>12</sup>

## Program Components

Beginning with the 2023-2024 PY, Avista's LIRAP consisted of the following components:

### My Energy Discount (MED)

- Available to all low-income customers.
- Monthly bill discount composed of five distinct discount tiers, the amount of which is based on an individual household's total gross income.
- Each income group – 0 to 5% Federal Poverty Level (FPL); 6 to 50% FPL; 51 to 100% FPL; 101 to 150% FPL; and 151% FPL to 200% FPL or 80% Area Median Income (AMI), whichever is greater – is provided with a specified discount percentage, to be deducted from the participating customer's net bill each month.
- Discount percentages are designed to reduce household energy burden below the high burden threshold of 6% (or 3% for customers with natural gas only).

### Arrearage Management Plan (AMP)

- Available to customers with incomes at 51% FPL to 200% FPL or 80% AMI, whichever is greater.
- Reduces a customer's past due balance over a 12-month period by providing an incentive for regular, on-time payment of their current bill plus a portion of their past due balance.
- Maximum benefit is \$2,500, with exceptions made for extreme, extenuating customer situations (as determined in collaboration with the Company's Energy Assistance Advisory Group (EAAG or Advisory Group)).

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<sup>11</sup> In alignment with RCW 19.405.020(24), "low-income" is defined as incomes ranging from zero to 200% Federal Poverty Level (FPL) or 80% Area Median Income (AMI), whichever is greater, adjusted for household size.

<sup>12</sup> For a complete description of these LIRAP modifications, please see the direct testimony of Shawn J. Bonfield (SJB-1T), filed January 21, 2022 in Docket No. UE-220053 et. al., in addition to the respective subsequent filings made in Docket Nos. UE-230539 and UG-230540.

- Available to customers twice every seven years

### Arrearage Forgiveness Program (AFP)

- Available to customers with incomes at zero to 50% FPL.
- Provides forgiveness of a customer's past due balance, available once per lifetime of the account.
- Maximum annual benefit is \$2,500, with exceptions made for extreme, extenuating customer situations (as determined in collaboration with the Company's EAAG).

### Emergency Share

- Available to all customers experiencing a hardship or energy emergency (such as risk of disconnection), regardless of income.
- Maximum benefit amount is \$400.

### Automatic Hardship Grant<sup>13</sup>

- One-time grant for customers experiencing financial hardship, as proven by a past due balance and subject to thresholds and timing intervals as determined by the EAAG.
- Mimics Emergency Share processes.
- Maximum benefit amount is \$350.

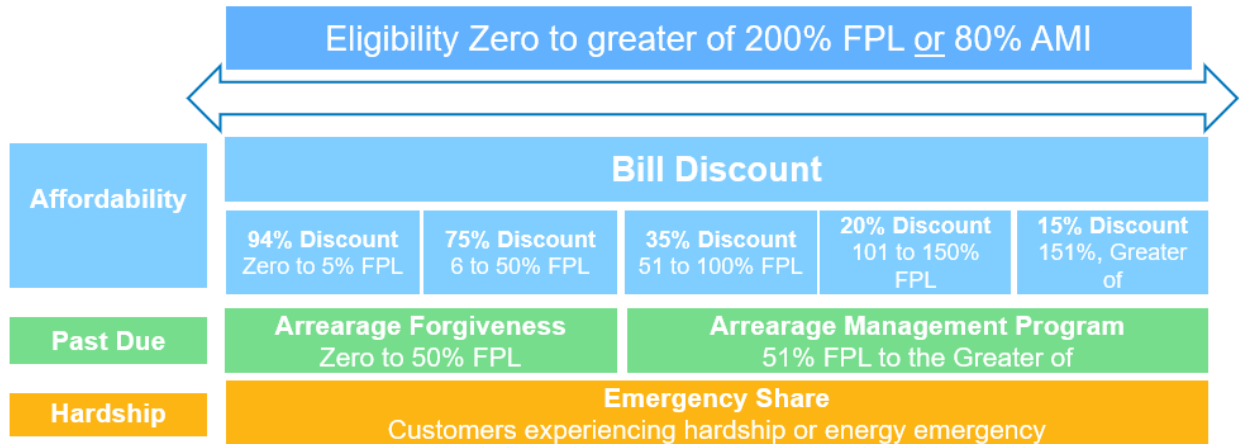
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<sup>13</sup> Introduced as an expedited grant offering on August 11, 2022, the Automatic Hardship Grant was established in collaboration and agreement with Avista's EAAG as a one-time grant intended to utilize existing unspent LIRAP funding to provide relief for customers' past due balances resulting from the COVID-19 pandemic and its effects. The Company has since maintained the availability of the Automatic Hardship Grant within its tariff, "just in case", though it has not been utilized further than the singular 2022 occurrence. Future Schedule 92 and 192 revisions may seek removal of this grant, as the budget structure for LIRAP no longer results in unspent funding as in prior years.



The LIRAP components and their corresponding income ranges (with the exception of the limited Automatic Hardship Grant) are illustrated in Chart No. 1 below.

*Chart No. 1 – LIRAP Components and Associated Income Ranges*



The LIRAP elements summarized above help to both alleviate the burdensome impact that a past due balance can have on a household, as well as to lower the overall energy burden on an ongoing basis so that customers are able to better maintain affordability each month. Additionally, while not a part of LIRAP, the donation-based Project Share<sup>14</sup> is also available to help customers experiencing hardship or an energy emergency (i.e., in jeopardy of disconnect due to nonpayment), providing yet another financial safety net to help resource-constrained customers manage their basic living costs.

## Self-Attestation

Prior to October 1, 2023, Avista customers seeking energy assistance through LIRAP were required to complete an application for such assistance with their local Agency, much like the qualification process required for LIHEAP – a process that involved, in most cases, scheduling an appointment with the Agency, providing proof of income (pay stubs, taxes, etc.), and then, often, waiting an extended period of time for

<sup>14</sup> Project Share is a donation-based, community funded program sponsored by Avista that provides one-time emergency support to customers within the Company’s service territory. Avista customers, employees and shareholders help support the fund with voluntary contributions that are distributed through local Agencies to customers in need.

the approved assistance grant to be manually applied to the customer's account. Beginning with the 2023-2024 Program Year, this burdensome customer process – regularly found to be a barrier to access for many customers seeking assistance – was all but eliminated by allowing customers to simply self-attest, or declare, their income. This declaration consists only of the customer stating their income and the size of their household, and can be completed with the local Agency, and now also with Avista via telephone, online application, or paper submission. This pivot from requiring proof of income in favor of an honor-based declaration means that the only criteria for receipt of LIRAP assistance is that the household is an Avista electric and/or natural gas customer (the primary or co-account holder), they have self-declared an income up to the greater of 200% FPL and 80% AMI for their respective household size, and they have agreed to the terms and conditions of the Program.

To create ease in the overall application and qualification process while also maintaining the integrity of the Program and ensuring that only those needing LIRAP are the ones receiving it, rather than requiring all customers to verify their income with a local Agency, Avista's LIRAP now contains a provision for randomized post-enrollment verification, or PEV.<sup>15</sup> Under this provision, participants of LIRAP's *My Energy Discount* became eligible for verification via a 6% random sample process in April of 2024 (beginning with the prior month's candidates from March), as further discussed within the *Post-Enrollment Verification* section of this Report.

## Joint Administration

Since its inception, LIRAP has historically been administered in partnership with – and distributed solely by – the seven distinct Agencies that serve Avista's Washington customers. Included with the modifications that became effective with the 2023-2024 PY, however, was the incorporation of Avista as a joint administrator of the Program. This change marks a foundational shift in the way customers access bill assistance, and one that works in tandem with self-declaration to significantly decrease access barriers for customers. With joint administration, customers are able to enroll in the Program

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<sup>15</sup> See Docket Nos. UE-230539 and UG-230540, *Avista Utilities Schedule 92 and 192 Modifications*, filed June 30, 2023, pgs. 6-9.

through both their local Agency and/or through Avista directly. As previously noted, funding collected for LIRAP each year has traditionally been divided amongst the seven Agencies that serve Avista's Washington service territory for disbursement to qualifying customers and, consequently, customers in need of energy assistance could only access LIRAP through these Agencies. The opportunity for Avista to become a joint administrator of its Program replaces the decades-old practice of only allowing customers one point of access when seeking LIRAP assistance for their utility bill.

Recognizing the important role that Agencies play within the communities they serve, as well as the additional services they can provide beyond Avista programs, joint administration was designed to closely align the procedures and relationships between both Avista and the Agencies. For example, because Agencies continue to be the sole administrator for many other customer assistance programs such as LIHEAP, affordable housing, and food assistance, ensuring that the connection to these other programs is still being made in instances when customers enroll in LIRAP through Avista directly is essential. To accomplish this, the contact and energy usage information of customers who enroll in MED is automatically sent to the appropriate Agency (via a secure weekly report) so that the Agency may proactively reach out to the customer to provide additional services. This process is discussed further within the *Connecting MED Participants with Additional Assistance* section of this Report.

# Program Year Results

With the programmatic and administrative transformation of LIRAP effective October 1, 2023, the 2023-2024 Program Year saw unparalleled growth in the number of customers served and the value of the benefits provided to those customers. This era of LIRAP offers relaxed eligibility requirements via self-attestation; improved access to the Program via joint administration, additional application channels, and automatic enrollments; and a more effective targeting of affordability, as the new *My Energy Discount* was designed to meet specific energy burden thresholds rather than the lump-sum grant approach of its predecessor.

Overall, discount-driven LIRAP performed exceptional in its first year, far surpassing the Company's 2023 preliminary estimates for participation. At that time, Avista had calculated a potential first year uptake of approximately 51,071 eligible customers, with a possible associated direct service (DS) spend<sup>16</sup> of about \$18.4 million for MED alone. When including both the AMP and AFP in these estimates, the total was forecasted at about \$24.3 million in LIRAP funds to be spent. In comparison to these estimates, year one of the new LIRAP structure resulted in approximately 56,915 households being provided with LIRAP benefits – including MED, AFP, AMP and/or Emergency Share – at a total expense of approximately \$27,092,242 in support of these efforts. This total is comprised of about \$24,078,590 in DS spend, about \$611,464 for Conservation Education (Con-Ed) Staff and Labor (funding provided to Agencies to support their individual Con-Ed programs), and approximately \$2,402,188 for Program implementation costs.<sup>17</sup> Further exceeding prior participation estimates, the 2023-2024 PY also went well beyond any historical performance of LIRAP, as further detailed within this Report. In just one year's time, Avista's discount-based LIRAP has already more than tripled its reach, helping around 56,915 individual households, in comparison to the grant-based LIRAP's prior ten-year average<sup>18</sup> of around 17,180 grants being provided to

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<sup>16</sup> Direct service spend represents funding provided directly to customer accounts (in the form of discounts, AMP, AFP, grants, etc.).

<sup>17</sup> Previously referred to as "Admin", these costs include those incurred by both the local CAAs as well as Avista in the administration and Program delivery.

<sup>18</sup> Ten-year average is the number of grants per year between the 2014-2015 PY and 2023-2024 PY.

customers each year. These major strides, as well as the resulting PY performance for each LIRAP component, is discussed in further detail below.

## Program Accessibility and Expansion

In January 2024, one quarter into the 2023-2024 Program Year, Avista updated its estimated eligible customer population as a result of reporting on the Company's Performance-Based Ratemaking (PBR) metrics for calendar year 2023.<sup>19</sup> The estimated income-eligible customer population (i.e., those that have incomes at or below 200% FPL or 80% AMI) went from 129,266 customers potentially eligible for LIRAP to 141,863 – a nearly 10% increase. For the purposes of this Report, Avista will be using the updated customer count of 141,863. Despite this mid-year increase in eligibility numbers, Avista was still able to reach a saturation rate<sup>20</sup> of 40% for energy assistance in its Washington service territory at the end of the 2023-2024 PY, much of which can be attributed to the ease of accessibility to MED. Avista will continue to update the estimated eligible population in the first quarter of each calendar year.

In addition to an expansion in those potentially eligible for the Program, the overall increased reach of LIRAP itself due to self-attestation and joint administration of the Program brought with it a need to advance the ways in which customers could access Avista or its Agencies to apply for LIRAP. Rather than the traditional in-person or telephone appointment with a CAA, customers are able to apply for LIRAP by telephone, a paper form, or through Avista's energy assistance website. The overall language with which Avista's LIRAP information was presented was also improved during the 2023-2024 PY, both in the verbiage used and the languages available – as discussed in further detail within the *Outreach & Engagement* section of this Report. All of these channels only require self-attestation of income to apply, further reducing the time and effort needed to receive assistance. To demonstrate the impact of joint administration and the added access channels available to households for LIRAP's 2023-2024 Program Year,

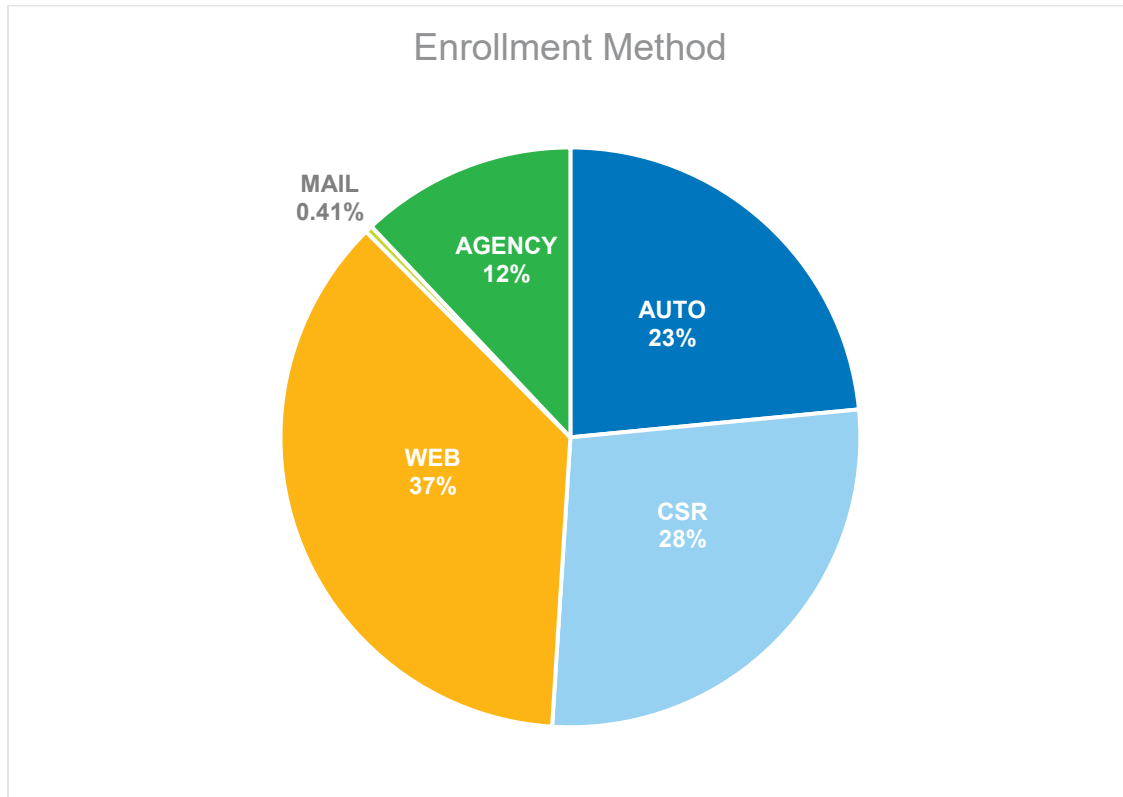
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<sup>19</sup> As part of the Company's affordability work in Docket Nos. UE-220053 et. al., Performance Based Ratemaking, as well as its Clean Energy Implementation Plan (Docket No. UE-210628), Avista updates the number of customers that may potentially be considered "low-income" on an annual basis.

<sup>20</sup> Saturation rate equals the percentage of estimated eligible customers who are receiving any form of bill assistance (including Emergency, Project Share, or miscellaneous).

Chart No. 2 below illustrates the enrollment distribution of customers for the PY, categorized by enrollment type.

*Chart No. 2 – LIRAP Participants by Enrollment Method*



A final modification incorporated into the 2023-2024 PY that helped to drastically increase the number of LIRAP customers served and to mitigate accessibility issues previously experienced by customers was the use of automatic enrollments for MED, which is discussed in further detail in the following section.

## **My Energy Discount**

MED replaced the previously offered LIRAP Heat (available to customers between 0-150% FPL) and LIRAP Energy (available to customers from 151-200% FPL or to 80% AMI, whichever is greater) grants, as well as the Senior and Disabled Rate Discount Program (available to customers 65 or older and/or living with a disability *and* with incomes between 151-200% FPL). Rather than having several grant-based offerings directed towards specified customer vulnerability characteristics (i.e., age, disability, etc.),

MED is available to all low-income customers that have service with Avista and is designed to adequately and appropriately reduce a given household's energy burden to an affordable level. MED's impressive performance in its first year can be attributed, in part, to the removal of application barriers (as previously described), as well as further actions taken by Avista and its partner Agencies to develop and expand the Program, such as automatic enrollments, described within this section, and braided marketing campaigns (as described within the *Avista Outreach and Engagement* section).

## Automatic Enrollments

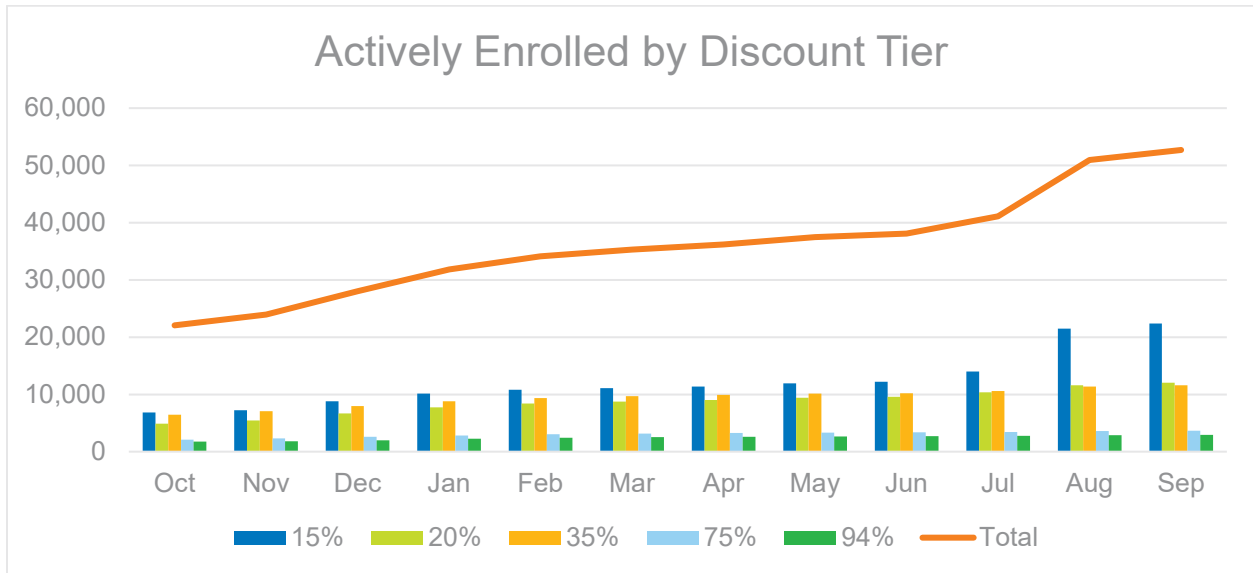
With Avista's new MED, AMP, and AFP becoming effective for the new Program Year on October 1, 2023, LIRAP was poised to reach more customers, both qualitatively and quantitatively, in unprecedented ways. The year's first such accomplishment was seen in October 2023, when approximately 17,683 customers were automatically enrolled in MED. These customers were identified by the Agencies as having received income-qualifying (such as LIHEAP or other energy assistance requiring income documentation) energy assistance within the last two years (October 1, 2021 – August 1, 2023). Using the household size and income data provided, Avista automatically enrolled these households at the appropriate discount tier. If the data provided was not specific enough to determine the appropriate discount tier, then the household was enrolled at the lowest discount tier of 15%. Avista then sent a letter advising the customer that the benefit is a general discount amount and directing them to contact Avista or their local Agency to update their information if they believe that the given discount is not accurately reflective of their current income situation. In the wake of this communication, 8,763 customers contacted Avista or an Agency to update their enrollment and receive a discount more suitable for their household's situation.

## MED Participation

Clearly illuminating the early and immediate impact of automatic enrollments, Chart No. 3 shows MED discount tier enrollments on a monthly basis for the entire 2023-2024 Program Year. After this initial group of auto-enrollments, enrollments in the other discount tiers gradually climbed throughout the Program Year as (1) new customers

enrolled at appropriate discount tiers and (2) auto-enrolled customers updated their income information to receive a discount amount more appropriate to their specific income.

*Chart No. 3 – My Energy Discount Enrollments by Month*



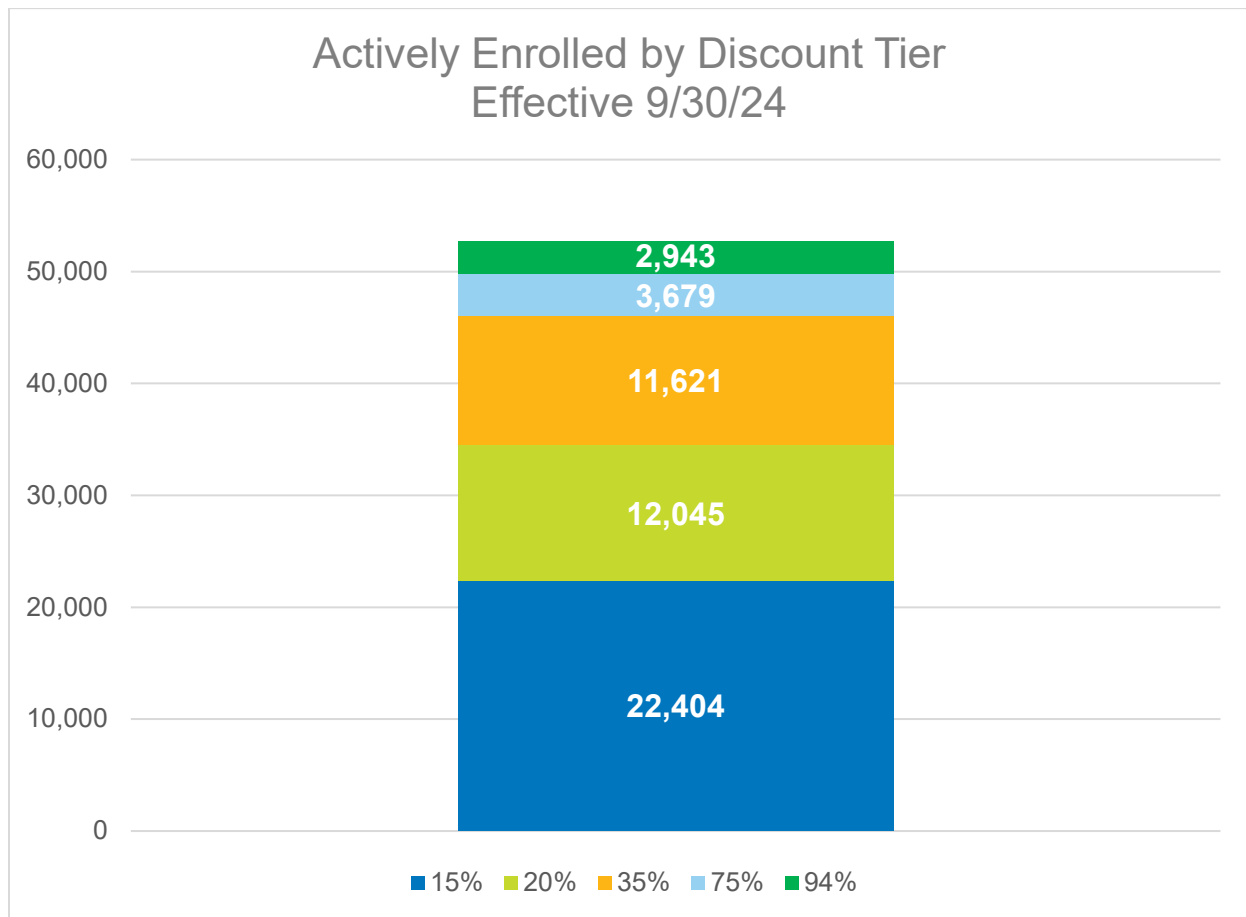
Visible in the steep enrollment incline between November and February is the impact of substantial marketing and outreach efforts that Avista engaged in during Program launch and throughout the heating season. Also notable is the surge between July and September, which is attributed to the braiding of marketing efforts related to the Washington Families Clean Energy Credit Grant Program, which provided low-income customers with a \$200 Clean Energy Credit,<sup>21</sup> and qualified them for MED if not already enrolled. Both of these successful marketing campaigns will be further detailed in the *Avista Outreach and Engagement* section of the Report.

At the end of the 2023-2024 PY, 52,692 Avista customers were actively enrolled in *My Energy Discount*. Chart No. 4 below provides a closer look at total households enrolled in MED, by discount percentage, as of September 30, 2024.

<sup>21</sup> The Clean Energy Grant was supported with funding from Washington’s Climate Commitment Act and provided Washington residents living below the greater of 80% AMI and 200% FPL with a one-time \$200 clean energy credit. All Avista customers enrolled in MED automatically received the credit because they fell within the income eligibility guidelines. Information about the CCA is available at [www.climate.wa.gov](http://www.climate.wa.gov).



Chart No. 4 – My Energy Discount Participants by Discount Tier



A stated goal of LIRAP, as mentioned earlier, is to provide assistance to more customers than are currently served by the Program, and *My Energy Discount* has made great strides in the interest of this goal during its first year of offering. This progress is illustrated in Table No. 1 with a comparison between the prior and current PYs and their respective customer benefits in terms of both number of customers served and total funding provided.

Table No. 1 – PY Comparison, LIRAP Grants and LIRAP Bill Discount

LIRAP 2022-2023 (Grant-based) vs. 2023-2024 (Bill Discount)				
Program Year	LIRAP Component	Total Customers Provided Benefits*	Total Customer Benefits	Average Annual Customer Benefit
2023-2024 (MED)	<i>My Energy Discount</i>	<i>Number of Customers Actively Enrolled (9/30/2024)</i>	<i>Total Spent on Bill Discounts During PY</i>	<i>Average Annual Customer Benefit</i>
	<b>2023-2024 PY Total</b>	<b>52,692</b>	<b>\$18,319,231</b>	<b>\$552</b>
2022-2023 (Grants)	<i>Grant Type</i>	<i>Total Grant Count</i>	<i>Total Grant Spend</i>	<i>Average Grant Amount</i>
	Heat	10,034	\$4,779,672	\$476
	Emergency Share	13,156	\$3,940,286	\$300
	Energy Grant	1,618	\$404,242	\$250
	RDP One-Time	1,438	\$359,500	\$250
<b>2022-2023 PY Total</b>	<b>26,246</b>	<b>\$9,483,700</b>	<b>\$361</b>	

\*Total Customers Provided Benefits in 2022-2023 may be less than the "Total Grant Count" reported, as some customers may have received more than one grant.

Avista’s results for the 2023-2024 PY underscore the advantages of transitioning to a low-barrier Program that emphasizes sustained and widespread financial assistance, rather than the more varied and emergency-focused support of previous years. MED is now serving nearly twice as many households, providing consistent and broad support to 52,692 households in its first year—37% of those estimated to be eligible. MED delivered approximately \$18 million in discounts to Avista customers during the 2023-2024 Program Year. Combined with the total direct service spend for LIRAP Emergency Share, AMP, and AFP, the total DS spending reached just over \$23.5 million for the households assisted through LIRAP, as detailed in this Report. This represents a more than twofold increase in customer participation compared to the 26,246 grants and approximately \$9.4 million spent in the prior 2022-2023 program year, marking a nearly 248% increase in funding.

## Connecting MED Participants with Additional Assistance

Once again, Avista recognizes the important role that Agencies play in their communities, providing access to basic needs and opportunities for economic mobility. With the transition to joint Program implementation and Avista becoming an entry point

to energy assistance, Avista and its partner Agencies sought to create a system that would ensure customers are still connected to their Agency and provided access to as many programs as they are eligible for. What resulted was both (1) a customer-initiated request for additional assistance, and (2) an automatic secure data transfer between Agencies and Avista that allowed Agencies to initiate contact with potential new clients. These processes are outlined below.

When a customer completes a MED application on Avista’s website, over the phone with Avista’s Bill Assistance Support & Enrollment (BASE) Team, or through a paper application at an outreach event, they have the opportunity to indicate interest in learning more about other forms of assistance. Figure No. 1 below depicts the online application and these options that customers can choose from:

*Figure No. 1 – MED-WA Application on myavista.com – Assistance Options*

**What other types of assistance would you like to learn about from your local Community Action Agency?  
(optional)**

- Food
- Housing
- Other Utilities
- Financial literacy
- Weatherization

Relatedly, Table No. 2 then reflects the percentage of customers completing the Avista application who ultimately request additional assistance, including which types of assistance the customer expresses interest in.

*Table No. 2 – MED Applicant Requests for Additional Assistance*

Assistance Type	Percent of Enrollees Requesting Additional Assistance <sup>22</sup>
<b>Financial Education</b>	11%
<b>Food Assistance</b>	26%
<b>Housing</b>	18%
<b>Other Utilities</b>	26%
<b>Weatherization</b>	21%
<b>Total Customers that requested at least one additional assistance type</b>	<b>38%</b>

If a customer initiates a request for additional assistance, Avista provides Agencies with this information via a weekly secure data exchange.<sup>23</sup> The Agencies then have the ability to reach out to households directly and connect them with other programs from which they may benefit.

Similarly, when a customer enrolls in MED through Avista, they are simultaneously notified that their information will be shared with their local CAA for connectivity to other potential programs. This basic customer enrollment information is then shared with the Agencies in the same secure data exchange described above. Both the customer-initiated and Avista-initiated processes provide opportunities for customers to connect with programs they may not have otherwise been aware of, in addition to expanding the reach of Agencies to new clients who may qualify for assistance and further establishing the Agency as a known, trusted entity within the communities they serve.

### **Post-Enrollment Verification**

As mentioned previously, in order to ease the overall application and qualification process through the use of self-attestation, the integration of a random post-enrollment verification process helps to safeguard the integrity of the Program by confirming that LIRAP funding is being distributed to those that qualify for it, and that it is being given in the appropriate amount to those customers, thereby ensuring responsible stewardship of this customer-funded Program. The process, timeline, and results of Avista’s experience with PEV thus far are outlined in the sections below.

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<sup>22</sup> Data includes Avista-enrolled customers only; customers who were auto-enrolled or Agency-enrolled excluded.

<sup>23</sup> SNAP receives a file transfer nightly due to the outsized volume of Avista customers they serve.

## PEV Process & Timeline

Avista began its PEV process – a randomized sampling that selects for verification 6% of enrolled MED customers – in April of 2024. The specific steps in the PEV process are outlined below:

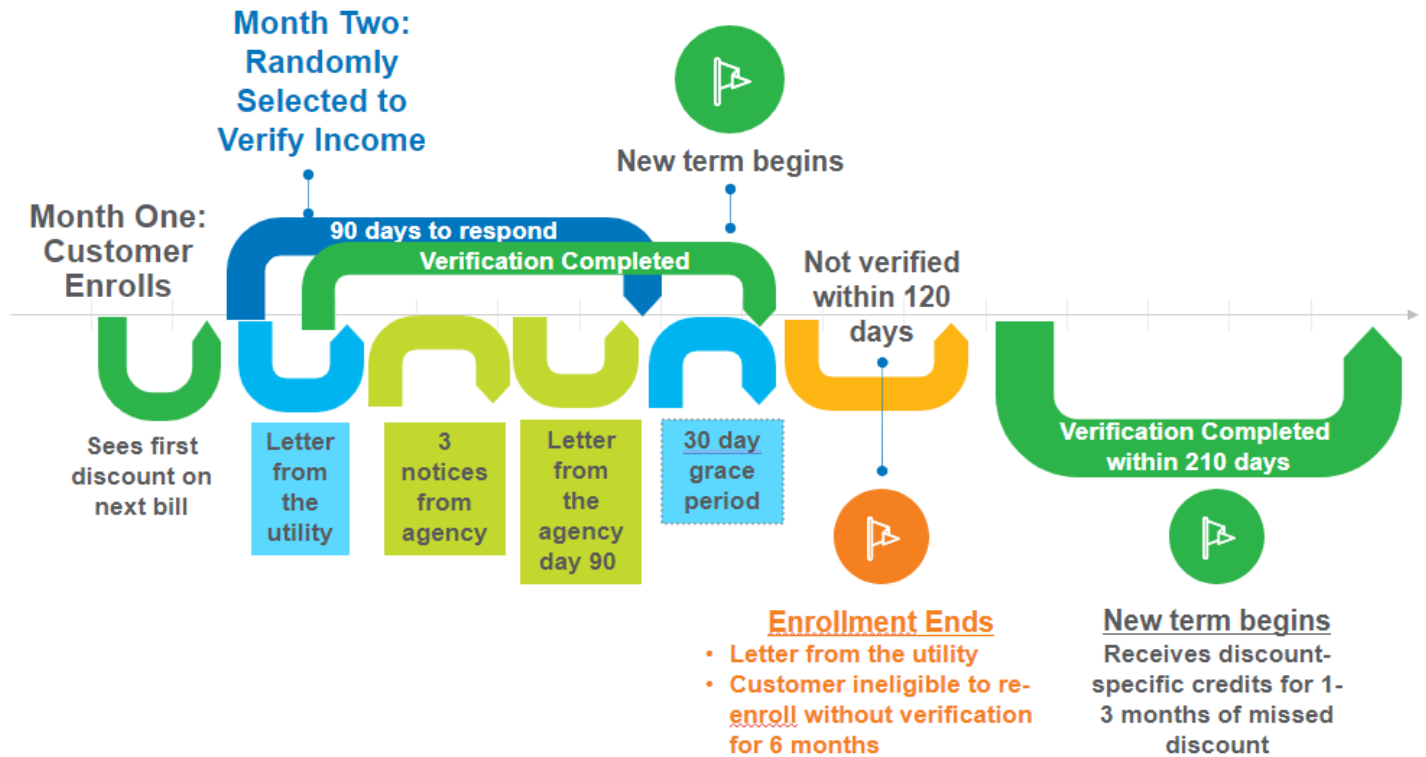
1. A customer is randomly selected for PEV the month after they enroll in *My Energy Discount*.
2. The customer receives a letter from Avista notifying them that they have been selected and instructing them to connect with their local Agency to verify their income (Agency name and contact information is provided in the letter).
3. The customer has 90 days to complete verification, with an additional 30-day grace period (total of 120 days) before they are removed from MED.
  - a. Throughout this timeframe, the customer will be contacted by their Agency up to 4 times – 3 in their preferred contact method (if available) and once via a letter at the 90-day mark.
4. If the customer responds and completes the PEV process, one of the following will apply:
  - a. If their self-attested income is the same as their verified income, their discount will not change. They will start a new two-year MED term with a verified income, effective the date the updated enrollment is submitted.
  - b. If their self-attested income is different than their verified income, they will be moved to the appropriate discount tier and start a new two-year term. Customers are not penalized for this difference in reported income, meaning that they are not required to pay back any discounts already received.
  - c. If the customer's verified income disqualifies them from MED entirely (i.e. they are over 200% FPL and 80% AMI), they will simply be removed from the *My Energy Discount* Program. This means they will no longer receive a discount moving forward but does not mean that they need to repay any of the prior discounts provided to them.
5. If the customer does not respond to the request for verification, they will be removed from MED after the 120-day deadline. They will receive a letter from Avista notifying them of the discontinuation of their discount and will be ineligible to reapply without verification for 6 months.
6. If the customer responds after the 120-day deadline and successfully verifies their income, they are eligible to receive discount-specific credits for 1-3 months of their missed discount.<sup>24</sup>

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<sup>24</sup> Credits are not account-specific, rather they are a flat amount based on the average monthly discount for each discount tier.

Figure No. 2 below provides a visual example of the ways in which a customer may experience the PEV process.

Figure No. 2 – Summary of Avista’s Post-Enrollment Verification Customer Journey



## PEV Results

Avista officially implemented the PEV process in April of 2024, about halfway through the 2023-2024 Program Year, after establishing the process in collaboration with its EAAG and working with Agency partners to prepare for the process. PEV is now conducted monthly and involves randomly selecting 6% of enrollees from the previous month to verify their income at their local Agency. From this pool of customers, any household that has already been income-verified<sup>25</sup> and/or was part of the auto-enrollment process is removed and the remaining customers are moved forward into audit status.

<sup>25</sup> When customers enroll at the Agency, the Agency can indicate via the Energy Assistance Workbench that the customer has been income-verified. This is common when they receive other forms of income-qualifying assistance, such as LIHEAP.

Table No. 3 below provides the foundational results of PEV from March<sup>26</sup> – September of 2024:

*Table No. 3 - PEV Results, March – September 2024*

PEV Results: March-September 2024		
<b>Selected for PEV</b>	1,314	100%
<b>Completed - Eligible</b>	621	47%
<b>Completed - Ineligible</b>	12	1%
<b>Pending</b>	532	40%
<b>Removed for Incompletion</b>	105	8%
<b>No Active Service</b>	44	3%

These early results demonstrate that nearly half (47%) of the customers selected for PEV are successfully verifying with an income that maintains their eligibility, while just 1% of those completing verification are removed from MED due to ineligibility. Because customers have up to 120 days – about 4 months – to complete the verification process, there is a significant percentage of customers with a “pending status”, as they have not yet reached that 120-day expiration date, so their results are still unknown. Of the 633 customers that have completed verification, however, the following results applied:

*Table No. 4 – Results of Completed Income Verifications*

Results of Completed Verifications	Customer Count	Percentage of Total
Decreased Discount	98	15%
Increased Discount	73	12%
No Change to Discount	302	48%
Did not Qualify	12	2%
Auto Enroll (Categorically Eligible) <sup>27</sup>	148	23%
<b>Total</b>	<b>633</b>	

Because Agencies are administering a significant portion of the PEV process, Avista monitors how the random selection pool represents the service territory as a whole

<sup>26</sup> Since the PEV process randomly selects customers for PEV the month after they enroll in MED, an April 2024 implementation date means that March 2024 enrollees were the first potential PEV-eligible customers.

<sup>27</sup> To help increase access to the WA Families Clean Energy Credit Grant Program, the Department of Commerce partnered with a third-party called Promise Pay and made their services available to participating utility providers throughout the state, including Avista. Promise Pay was able to verify customer participation in other income-qualified programs, allowing Avista to auto-enroll customers with “categorical eligibility” for MED.

with regard to Agency workload. Table No. 5 below illustrates the distribution of PEV random selection as compared to the distribution of MED enrollments throughout Avista’s Washington service territory.

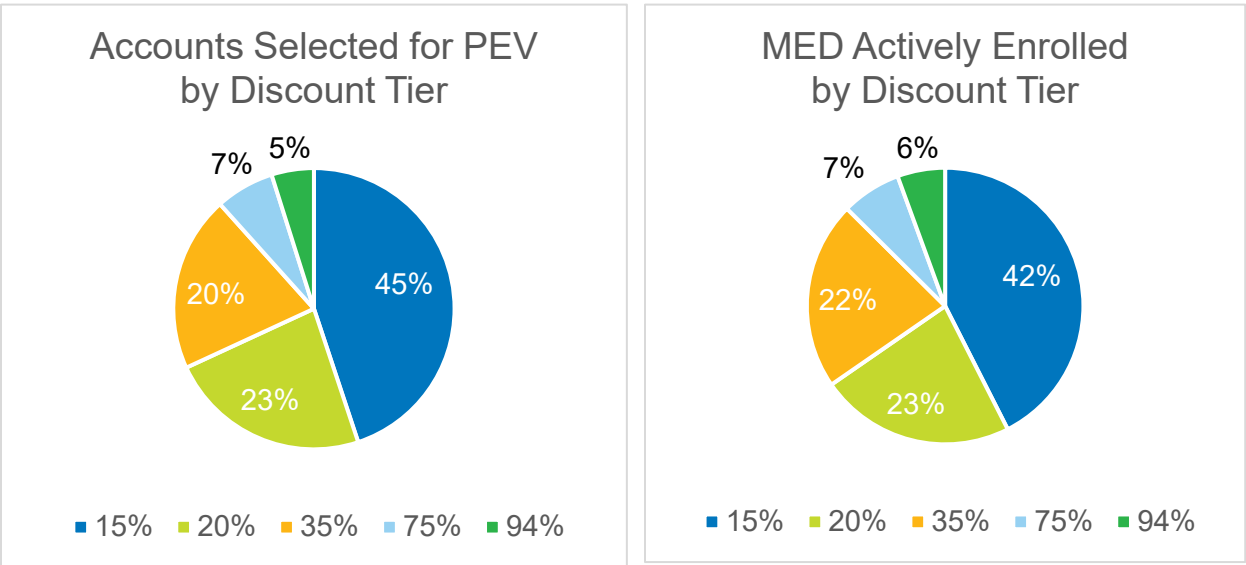
*Table No. 5 – PEV Accounts Selected by Agency vs. Enrollments by Agency*

<b>Agency</b>	<b>Corresponding Counties</b>	<b>PEV Accounts Selected</b>	<b>MED Enrollments</b>
<b>Community Action Center (CAC)</b>	Whitman	5%	6%
<b>Community Action Partners (CAP)</b>	Asotin	4%	5%
<b>Opportunities Industrialization Center (OIC)</b>	Adams, Franklin, Grant	3.08%	3.02%
<b>Rural Resources Community Action</b>	Ferry, Lincoln, Pend Oreille, Stevens	8%	10%
<b>Spokane Neighborhood Action Partners (SNAP)</b>	Spokane	80%	75%
<b>Spokane Tribe</b>	Stevens (Spokane Tribe Reservation)	0.08%	1%
<b>Washington Gorge Action Partners (WGAP)</b>	Klickitat, Skamania	0.08%	0.2%

These results indicate that, so far, the use of random selection has allowed for a closely representative distribution of PEV administrative workload throughout its service territory. Equitable distribution of Agency workload through random selection is one of the elements that Avista measures, in addition to equitable distribution of PEV selection between different discount tiers. Chart No. 5 below provides a comparison between the percentage of accounts selected for PEV by discount tier to the total MED enrollments by discount tier.



*Chart No. 5 – Accounts Selected for PEV by Discount Tier Compared to Total MED Enrollments by Discount Tier*

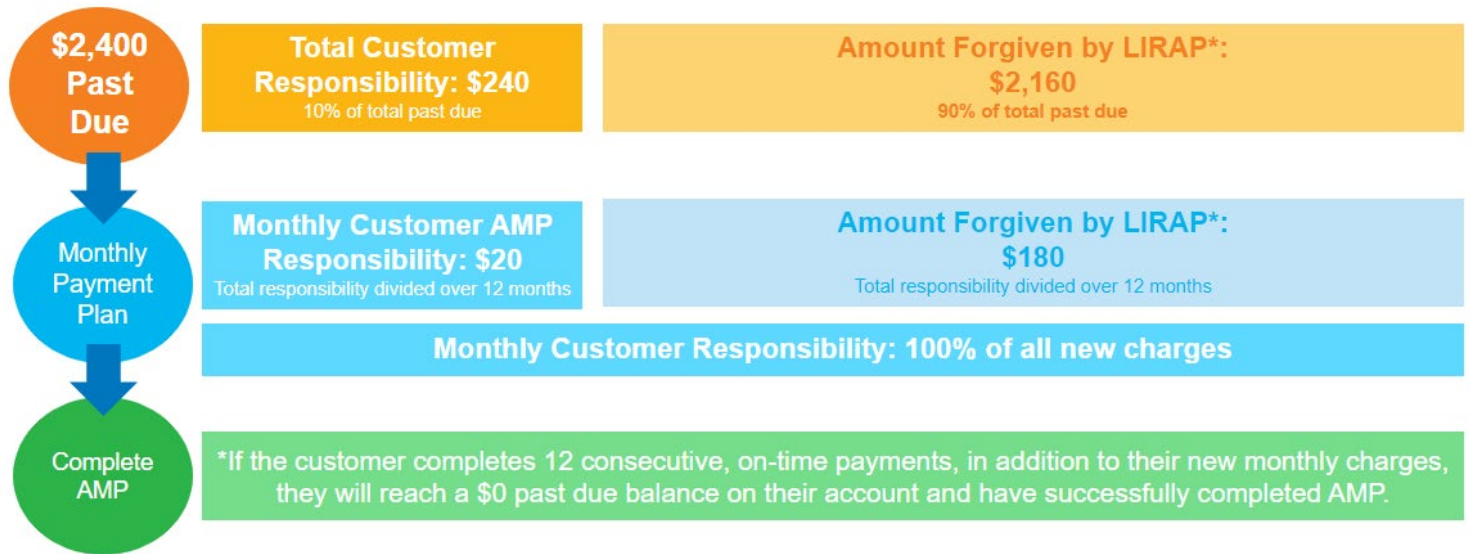


The Company will continue to monitor this distributive representation, as well as other demographic data points where available (e.g., education level, homeowners vs. renters, ethnicity, etc.) for the PEV population as it compares to the broader customer population as it continues to gather this data through program enrollment.

### Arrearage Management Plan

The AMP benefit is designed to assist qualified customers with incomes between 51% FPL and the greater of 200% FPL and 80% AMI by (1) reducing the amounts of an unpaid, past-due balance owed over time and (2) by rewarding regular payment behavior. To accomplish this, upon enrollment in the AMP, 10% of the arrears the customer is responsible for is spread out over a 12-month period. For each on-time payment the customer makes on their portion of the arrears (in addition to their current bill), 1/12<sup>th</sup> of their remaining arrears balance (the 90%) will be forgiven (i.e., paid for by Avista’s LIRAP). The following is an example of how the AMP customer benefit is applied:

Figure No. 3 – Sample AMP Customer Benefit



## AMP Participation & Benefits

Throughout the 2023-2024 Program Year, Avista’s AMP provided nearly \$649,000 in credits to participating customers’ accounts. In total, 2,734 households enrolled in the AMP during the PY: 2,677 enrolled through Avista and 77 through the Agencies. At the end of PY 23-24, about 1,936 customers remained actively enrolled in the AMP, with a total of approximately \$1,022,777 remaining to be paid on all AMP arrangement accounts (\$102,278 to be paid by participating customers and \$920,499 by LIRAP). In total, the median benefit provided to all AMP customers for the 2023-2024 PY was \$45,706 and the maximum benefit provided was \$110,996. On a per-customer basis, this median total benefit was \$217, and the maximum total customer benefit was \$1,772. An overview of monthly participation and benefit distribution is illustrated in Table No. 6 below.

Table No. 6 – AMP Participants Receiving Benefits

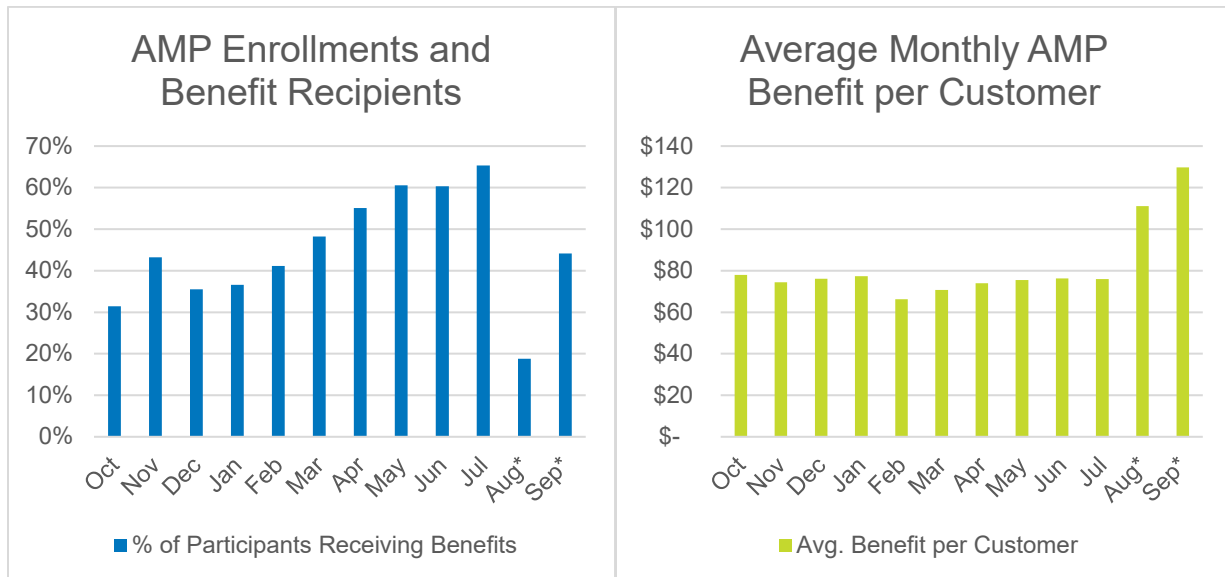
Benefit Month	Accounts Enrolled	Accounts Receiving Benefits	% of Participants Receiving Benefits	Total Benefit Applied	Avg. Benefit per Customer
Oct	350	110	31%	\$8,571	\$78
Nov	449	194	43%	\$14,449	\$74
Dec	662	235	35%	\$17,891	\$76
Jan	968	354	37%	\$27,378	\$77
Feb	1,243	511	41%	\$33,821	\$66
Mar	1,491	719	48%	\$50,816	\$71
Apr	1,742	959	55%	\$70,875	\$74

<b>May</b>	1,905	1,153	61%	\$86,980	\$75
<b>Jun</b>	1,949	1,175	60%	\$89,654	\$76
<b>Jul</b>	1,946	1,272	65%	\$96,657	\$76
<b>Aug*</b>	1,955	368	19%	\$40,896	\$111
<b>Sep*</b>	1,936	854	44%	\$110,774	\$130
<b>Total</b>	2,734	2,303	84%	\$648,762	\$282

*\*Account credits in August and September were delayed due to the method used to apply the WA Families Clean Energy Credit to customers' accounts.*

Presented another way, the chart below provides a visual of the percentage of enrolled AMP participants that received a benefit amount for the given month, as well as the corresponding average monthly benefit.<sup>28</sup>

*Chart No. 6 – 2023-2024 PY Percent of AMP Enrollees Receiving Benefits; Average Monthly Benefit Amount*

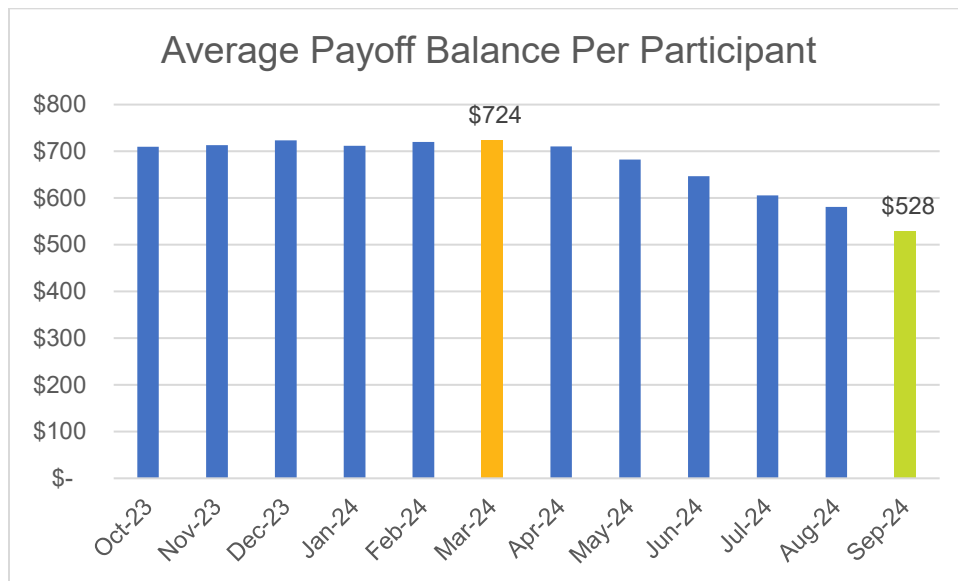


Both the decline in percentage of participants receiving benefits and the lowered average pay-off balance in August and September can be attributed to the Washington Families Clean Energy Credits for \$200 which were applied to all MED customers' accounts in the summer of 2024. Chart No. 7 below illustrates what the average pay-off balance (amount still owed on the arrangement) has been per account. The amount owed is far less than the \$2,500 maximum and has remained at a steady average of around

<sup>28</sup> AMP customers only receive a LIRAP credit when the monthly billed amount (current charges + arrangement amount) is paid in full, and they are removed from the AMP after two consecutive months of missed payments. Because of this, differences between those enrolled and those actually receiving benefits exist.

\$700 until the summer of 2024 when the Clean Energy Credits were applied. These credits paid down many AMP pay-off balances, with any resulting credit applied once the next customer payment posts to the account. The lowest average pay-off balance for the AMP this Program Year was \$528 per participant (occurring in September 2024), and the highest average pay-off balance was \$724 (in March 2024), as shown in Chart No. 7 below.

*Chart No. 7 – AMP Average Pay-off Balance Per Participant*



As previously mentioned, MED was designed to interface with other LIRAP components so that customers can not only receive assistance with past due balances or in moments of hardship, but also experience ongoing affordability. This cross-enrollment is important because AMP requires that customers continue paying their current charges while enrolled, and the increased affordability of their current charges with MED makes compliance with that requirement much more attainable. The impact of this cross-enrollment can be seen in Table No. 7 below, which compares the average number of days customers were actively enrolled in AMP for the current PY – during which customers could also receive MED – to previous PYs where this combination was not available (the AMP has been available as a LIRAP offering since the 2021-2022 Program Year).

*Table No. 7 – Comparison of Average Months Actively Enrolled in AMP*

Program Year	Accounts Enrolled	Average Days Actively Enrolled
21-22 PY	182	137
22-23 PY	302	191
23-24 PY	2,734	201
<b>Total</b>	<b>3,128</b>	<b>196</b>

While cross-enrollment in *My Energy Discount* and the Arrearage Management Plan does increase the ability for customers to successfully complete the AMP and pay off their past due balance, there are still instances where customers are unable to complete the AMP. Since the AMP is designed to promote regular, on-time payment behavior, naturally, one of the requirements of the AMP is that customers cannot miss more than two consecutive payments and remain on the program. With this requirement in place, AMP enrollments can be canceled if these payments are missed. Table No. 8 below provides further detail on this customer segment.

*Table No. 8 – Percentage of AMP Enrollments Canceled for Non-Payment*

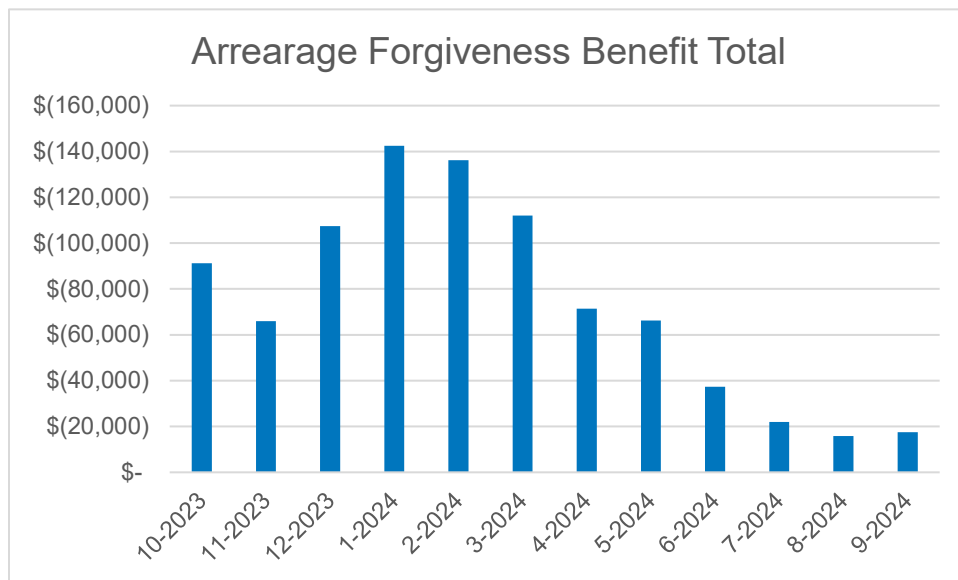
23-24 PY	Active Participants	Canceled for Non-Payment	% of Active Canceled for Non-Payment
Oct	350	0	0%
Nov	449	5	1%
Dec	662	26	4%
Jan	968	45	4%
Feb	1,243	40	3%
Mar	1,491	124	8%
Apr	1,742	66	4%
May	1,905	78	4%
Jun	1,949	108	5%
Jul	1,946	91	4%
Aug	1,955	2	0%
Sep	1,936	83	4%

## Arrearage Forgiveness Program

The AFP was first offered in the 2023-2024 Program Year and is designed to assist qualified customers with incomes between 0-50% FPL by forgiving their past-due balance

up to \$2,500.<sup>29</sup> Similar to the AMP, the AFP is compatible with MED and provides customers who have unmanageable past due balances the opportunity to both reduce or completely alleviate that past due balance and, as a result, make their ongoing monthly charges affordable. In its first full Program Year, the AFP provided \$885,817 in credits to participating customers' accounts. In total, 1,309 customers received forgiveness through the AFP during the PY: 1,162 enrolled through Avista and 147 through the Agencies. The minimum, median and maximum benefits for AFP were \$83, \$522, and \$3,692, respectively, with the average benefit being \$677. Chart No. 8 below illustrates the benefit totals per month throughout the 2023-2024 PY.

*Chart No. 8 – AFP Benefit Totals by Month – PY 2023-2024*



## Emergency Share

When Avista replaced its existing grant-based LIRAP in favor of the income-based bill discount model for all eligible low-income customers, consistent with the expectations of both CETA and SB 5295, the Company opted to retain three of the existing elements of LIRAP: the AMP, the Automatic Hardship Grant (as described on pg. 8) and Emergency Share. Emergency Share is the only consistent grant-based assistance remaining within

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<sup>29</sup> Customers are eligible for a hardship exception of up to \$5,000 if they are experiencing an extreme extenuating circumstance as defined and approved by the Energy Program Manager at their local CAA. During the 2023-2024 PY, two customers received the hardship exception over \$2,500.

LIRAP and is designed to help customers in emergency or hardship situations, providing them with a benefit of up to \$400. Also unique to Emergency Share is its sole administration through the Agencies, while all other LIRAP components became jointly administered between both the CAAs and Avista in the 2023-2024 PY. This is because Avista’s partner Agencies have better visibility into a customer’s holistic financial picture, which equips them to distribute these funds in a more data-informed way. Emergency Share also provides CAAs with an immediate option to help customers in an energy emergency while they simultaneously work with them on accessing longer term assistance like *My Energy Discount* or an arrearage assistance program.

During the 2023-2024 PY, 10,293 customers received Emergency Share grants, with the average grant amount being \$202 and the total assistance provided totaling \$3,583,504. Because of the additional offerings made available in PY 2023-2024, including MED and the AFP, the number of Emergency Share participants was only slightly higher than average despite overall LIRAP participation rates nearly doubling. Also of note is that the average benefit per customer was at 64% of the six-year historical average benefit amount, indicating a clear reduction in need amongst customers requesting Emergency Share assistance.

*Table No. 9 – LIRAP Emergency Share Grants, October 2018 – September 2024*

Program Year	LIRAP Emergency Share Grants		
	Participants	Total Benefit	Average Benefit
<b>18-19 PY</b>	10,211	\$ 2,957,944	\$ 290
<b>19-20 PY</b>	11,996	\$ 3,528,478	\$ 294
<b>20-21 PY</b>	7,337	\$ 2,306,538	\$ 314
<b>21-22 PY</b>	8,978	\$ 2,874,156	\$ 320
<b>22-23 PY</b>	12,367	\$ 3,940,286	\$ 185
<b>23-24 PY</b>	10,293	\$ 3,583,504	\$ 202
<b>Total</b>	<b>61,182</b>	<b>\$ 19,190,908</b>	<b>\$ 314<sup>30</sup></b>
<b>Avg</b>	<b>10,197</b>	<b>\$ 3,198,485</b>	<b>\$ 314</b>

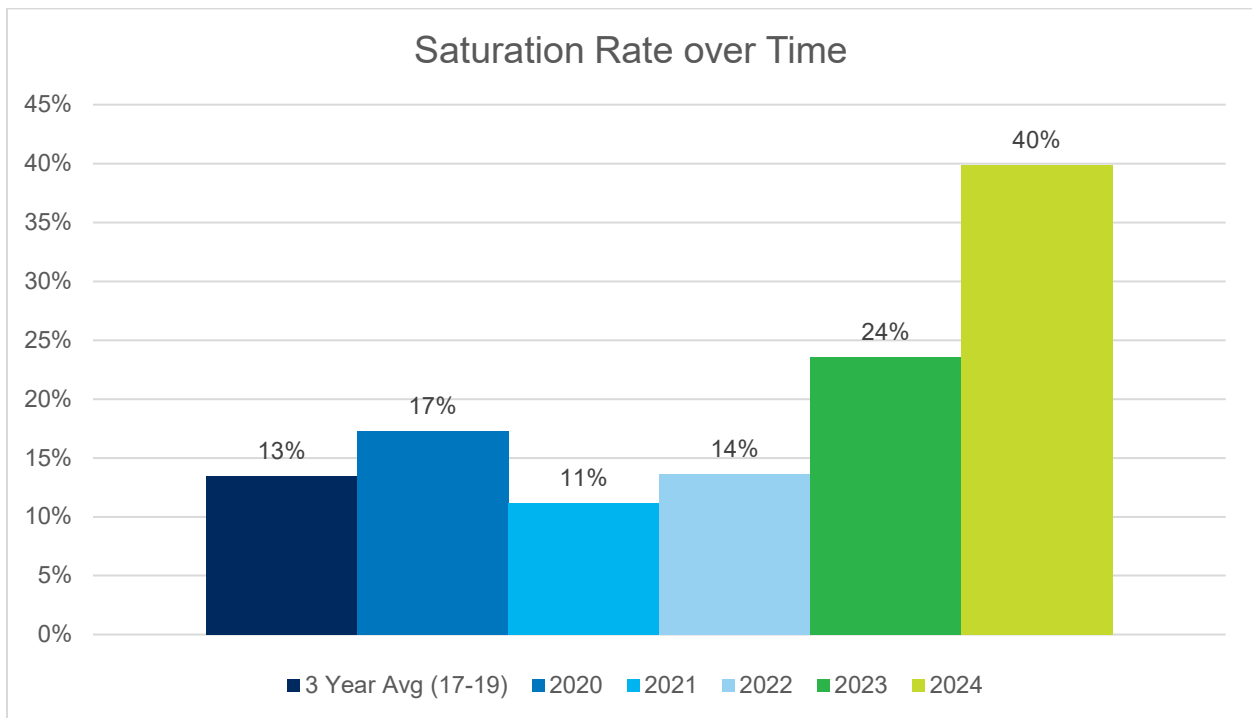
<sup>30</sup> The total average benefit is the total benefit divided by the total number of participants. Because the ratio is the same for the average, both the total and average benefits are \$314.

# Overall Impact of the 2023-2024 LIRAP Program Year

## Increased Saturation Rates

One of the primary metrics that the Company uses to measure Program success of LIRAP is saturation rate – the percentage of eligible participants who are enrolled in one or more of LIRAP’s offerings or receive any other form of traditional bill assistance. Increases in saturation rate may indicate successful marketing and outreach efforts, where stagnant saturation in particular demographics or regions can help to highlight areas where the Program may be missing its intended audience. During the 2023-2024 PY, and due to the many transformational changes highlighted throughout this Report, Avista saw unprecedented increases in its bill assistance saturation rate. Chart No. 9 below illustrates this increase from the pre-COVID 3-year average (2017-2019) saturation rate of 13% to the rate of 40% encountered at the end of the 2023-2024 Program Year – more than a threefold increase.

Chart No. 9 – Saturation Rate, 2017 - 2024<sup>31</sup>



<sup>31</sup> Saturation rate is based on estimated eligible number of customers (141,863) by calendar year for all years except for 2024 (which is through the end of the Program Year, September 30, 2024).



Also notable regarding LIRAP saturation is the increase in participation to 17% experienced in 2020, which is representative of the additional energy assistance funds that were available in response to the COVID-19 pandemic. Following the pandemic in 2021 and 2022, energy assistance saturation returned to more historically average rates as those additional funding sources were no longer available. Then, with the launch of MED in October 2023, the saturation rate increased by 10% by the end of the calendar year, with that rate only continuing to climb through September 2024 as MED, joint administration, and all the outreach that went along with it, persisted. Avista set an internal Company goal of reaching 40% saturation rate by the end of calendar year 2024 and is pleased to have reached that goal.

As noted, CETA helped to act as a catalyst for many of LIRAP's programmatic changes that went into effect in PY 2023-2024. Part of this legislation requires Washington electric utilities to assess the funding levels necessary to reach 60% of the current energy assistance need by 2030, and 90% of the current energy assistance need by 2050.<sup>32</sup> With the eligible customer population continuing to change each year, the Program participation necessary to reach those targets will also change annually. The Company will continue to update these metrics and report on them as the 2030 and 2050 deadlines approach.

## Energy Burden Reduction

One of LIRAP's primary goals is to reduce the energy burden – the percentage of a household's annual income that goes towards the cost of energy – of Avista's low-income customers. MED, in particular, is designed to address *differential* energy burden, which recognizes that different income levels experience energy burden differently and, therefore, need a more customized approach to bill assistance. MED seeks to address differential energy burden by offering five enrollment tiers, each with a unique discount percentage and corresponding income range. Customers in each tier receive a monthly discount on their Avista bill that is designed specifically to reduce their energy burden to

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<sup>32</sup>Specifically, Section 12.4.iii of CETA (codified as RCW 19.405.120).

6% or lower. Table No. 10 below reiterates the five discount tiers and their corresponding income ranges.

*Table No. 10 – MED Income Ranges & Associated Monthly Discounts*

<b>Household Income</b>	<b>Bill Discount</b>
Zero to 5% FPL	94%
6 to 50% FPL	75%
51 to 100% FPL	35%
101 to 150% FPL	20%
151% FPL to the greater of 200% FPL or 80% AMI	15%

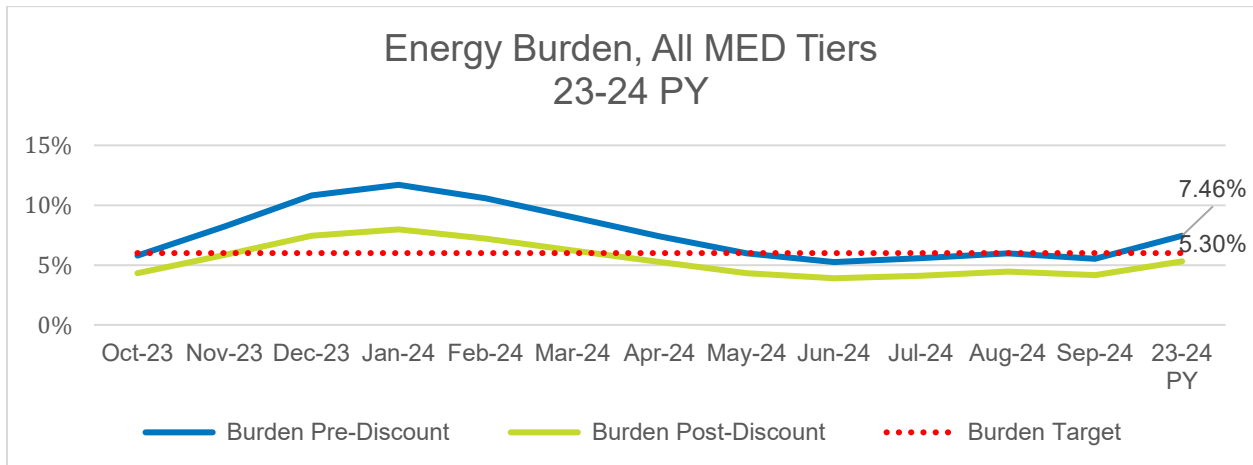
Assessing the energy burden of a household requires two foundational data points: annual household income and the annual cost expended on energy bills. While Avista has always had access to the latter of these two for its customers, income information was historically collected by and housed exclusively at the Agencies. With the move to joint implementation in PY 2023-2024, Avista has been able to gain visibility into customers' income and therefore, a better understanding of customer energy burden. It is worth noting that access to customer income information by Avista serves the sole purpose of analyzing Program effectiveness. Avista holds firm in its belief that the Agencies should continue to be the entities that collect and store customer income data and documentation in alignment with their official establishment as Community Action Agencies.<sup>33</sup>

Chart No. 10 below illustrates the impact that Avista's MED has had on participating customers throughout the 2023-2024 PY. This chart articulates the energy burden for customers both before they were enrolled in MED ("Burden Pre-Discount") and after they began receiving the discount ("Burden Post-Discount"), as well as providing a benchmark for the 6% "High Burden Threshold" (red dotted line).

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<sup>33</sup> Community Action Agencies were established under the 1964 Economic Opportunity Act as part of the War on Poverty as local non-profit organizations to fight poverty and promote self-sufficiency.

Chart No. 10 – Average Energy Burden for All MED Participants



From this view, it is evident that MED, on average, is accomplishing its goal of reducing customers’ annual energy burden to below the 6% threshold – taking the average MED participants burden from approximately 7.46% to 5.3%. However, this chart also demonstrates the major role that seasons play in energy burden, with usage peaking during the winter months when households are more likely to be heating their homes and dipping during the warmer months, and energy burden naturally following suit. It is important to note that for 9 months out of the year (March – November), MED-enrolled customers, as a whole, remained at or below the 6% energy burden threshold during the 2023-2024 PY.

Table No. 2 below dives deeper into MED’s energy burden impact by comparing average burden by discount tier, again providing this information at the pre- and post-discount levels, but also adding total energy burden for MED participants that received some other form of energy assistance (e.g., LIHEAP) in addition to MED. This disaggregation of MED participant data provides a more granular examination of the efficacy of each individual tier in reducing a household’s energy burden, as well as acknowledging that LIRAP, while a significant contributor to decreasing customer energy burden, is not intended to be the sole energy assistance mechanism available to Avista customers. Connection with federal, state, or other funding sources, as well as more long-term and far-reaching resolutions such as energy efficiency services, is paramount in the overall affordability dynamic. Customer-funded programs like LIRAP have not been, nor should they be, the primary source of energy assistance or economic solution for utility

customers. This is why Avista remains committed to maintaining its collaborative relationships with its community partners and Agencies to ensure the most holistic approach to energy burden reduction and hopes to see these external funding sources and economic improvements continue to expand and alleviate the chronic poverty faced by many Avista customers.

*Table No. 11 – Average Energy Burden for All MED Participants by Discount Tier*

Energy Burden by Discount Tier			
	Without MED	With MED	MED + Additional EA
15%	4.84%	4.14%	4.06%
20%	6.81%	5.52%	5.27%
35%	10.11%	7.06%	6.36%
75%	22.25%	8.68%	7.11%
94%	338.36%	78.37%	57.12%
<b>Combined</b>	<b>7.46%</b>	<b>5.30%</b>	<b>4.97%</b>

While the combined energy burden reduction is appropriately in alignment with the overall purpose of LIRAP, and the trend of energy burden reduction applies across all discount tiers as a result of MED enrollment, the goal of reducing energy burdens to below 6% is not achieved for *all* MED discount tiers, especially for those that do not receive additional energy assistance. In the 94% discount tier, for example, the energy burden was reduced by more than 75% through MED yet is still significantly higher than that of other tiers. For other tiers such as the 15% tier, however, those qualifying for this tier – households with incomes between 151% FPL to 200% FPL or 80% AMI, whichever is greater – are already below the energy burden threshold prior to their receipt of any energy assistance, MED or otherwise. This information will better help Avista as it continues to engage with its EAAG in the ongoing assessment and review of its LIRAP to inform future programmatic changes or enhancements.

### *Energy Burden by Service/Fuel Type*

As a provider of both electric and natural gas service, Avista also recognizes the importance of understanding how fuel type might impact energy burden. Table No. 12

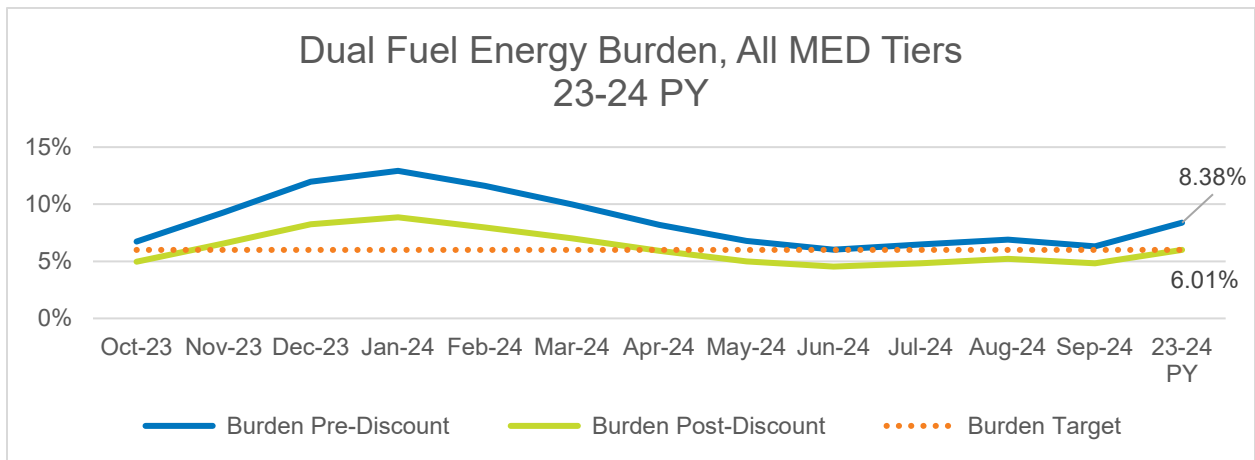
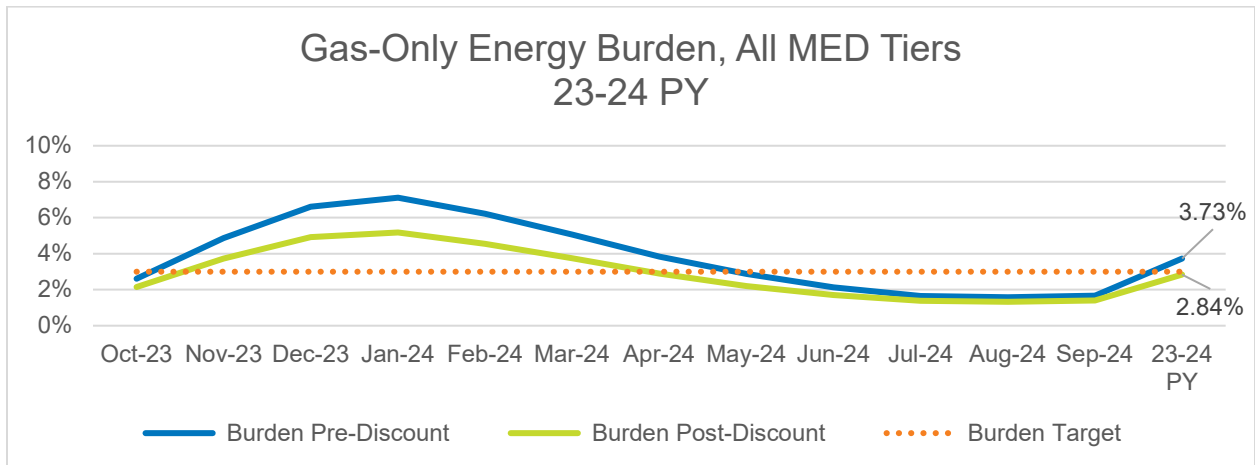
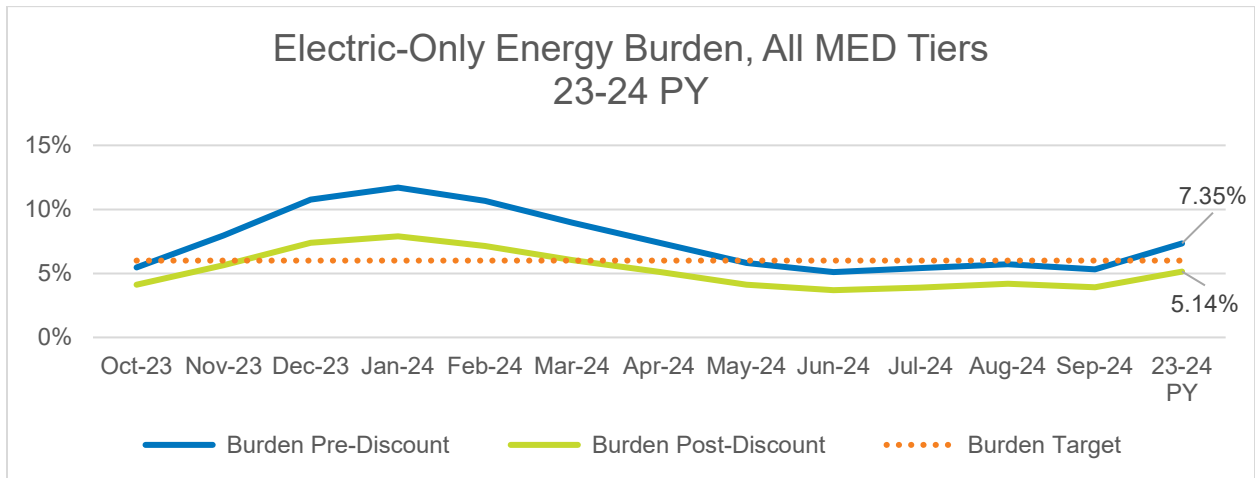
below illustrates the energy burden for electric, natural gas, and dual fuel customers with varying levels of energy assistance (none, MED, MED + additional EA), and at each discount tier.

*Table No. 12 – Energy Burden by Service Type and Discount Tier*

Energy Burden by Service Type and Discount Tier									
	Without MED			With MED			With MED & Additional EA		
	Electric	Gas	Dual	Electric	Gas	Dual	Electric	Gas	Dual
<b>15%</b>	4.29%	2.82%	5.55%	3.67%	2.43%	4.75%	3.53%	2.34%	4.70%
<b>20%</b>	6.24%	3.59%	7.81%	5.06%	2.94%	6.33%	4.73%	2.80%	6.11%
<b>35%</b>	9.37%	5.23%	12.04%	6.60%	3.70%	8.33%	5.76%	3.24%	7.74%
<b>75%</b>	20.61%	10.53%	26.16%	8.29%	4.40%	9.85%	6.51%	3.41%	8.47%
<b>94%</b>	298%	1,137%	390%	72%	262%	88%	48%	185%	68%
<b>Fuel Total</b>	<b>7.35%</b>	<b>3.73%</b>	<b>8.38%</b>	<b>5.14%</b>	<b>2.84%</b>	<b>6.01%</b>	<b>4.67%</b>	<b>2.65%</b>	<b>5.77%</b>
<b>COMBINED</b>	<b>7.46%</b>			<b>5.30%</b>			<b>4.97%</b>		

On average, MED is achieving the goal of reducing customers’ energy burden to 6% or less for all fuel types (within .01%); when coupled with additional energy assistance, this reduction is even more pronounced. However, energy burden fluctuates significantly within each discount tier and by fuel type. Customers with gas-only service, for example, consistently have a lower relative energy burden compared to those with electric-only or dual fuel service – on average, as well as within each individual discount tier – with the exception of those customers at the 94% discount tier (0-50% FPL). The burden on these customers, even when receiving the highest level of energy assistance, is outsized compared to any other discount tier. Because of the seasonal nature of energy usage described earlier, especially variable by fuel type, Avista also looked at energy burden by fuel type over the course of the Program Year. This analysis is available in Chart No. 11 below.

Chart No. 11 –Energy Burden by Fuel Type, All MED Tiers, 23-24 PY



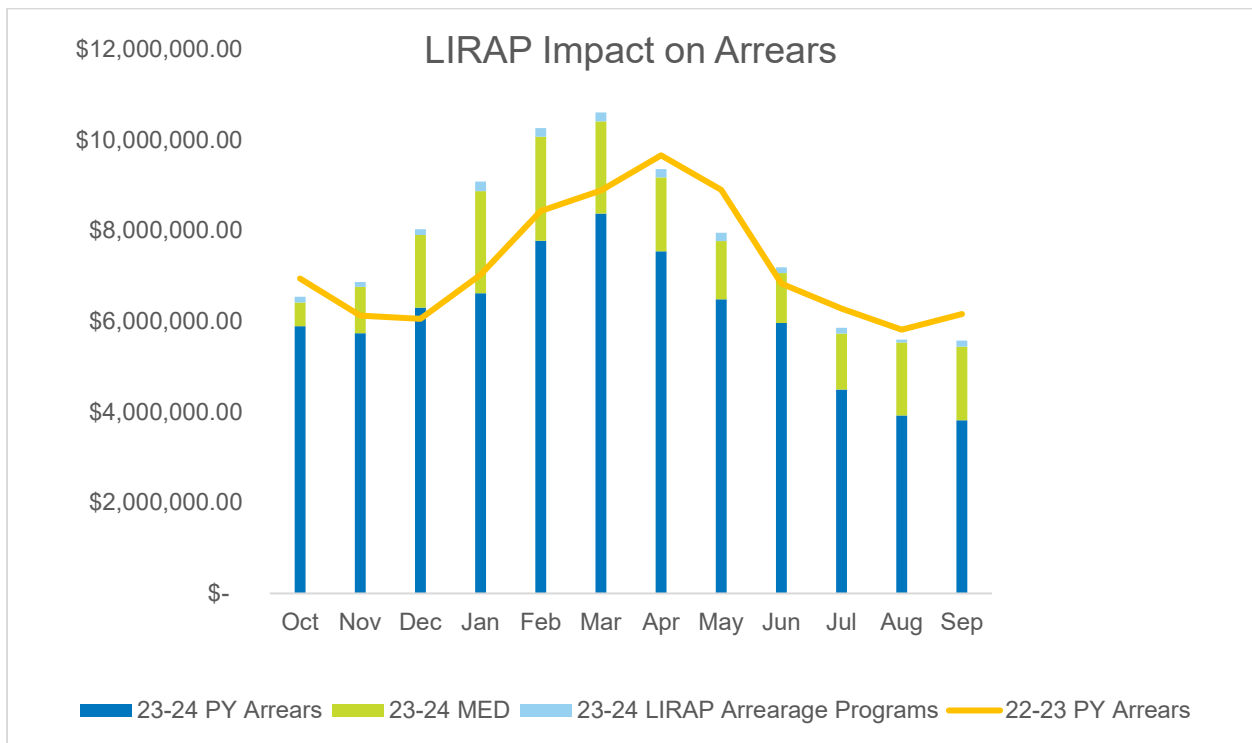
There are many factors that impact energy burden, including seasonality, level of energy assistance applied, discount tier, and fuel type. Avista intends on sharing this data with its EAAG to better understand the factors that contribute to differential energy burden and identify persistent trends; from there, Avista and its EAAG can work together to

improve the efficacy and accuracy of MED’s tiers to better meet the needs of households within the Company’s service area.

## Impact on Arrears

With another stated goal of LIRAP being to keep customers connected to energy service, an important metric for the Company is the impact that LIRAP is having on past-due balances, or arrears, which indicates risk of disconnection. Chart No. 12 below illustrates this interaction between LIRAP components – MED and arrearage assistance – and arrears from PY 2022-2023 and PY 2023-2024.

*Chart No. 12 – LIRAP Impact on Arrears, PY 22-23 to PY 23-24 Comparison*



In looking at the financial impact the new LIRAP may have on arrearages, there are early takeaways to be had, but more time is needed to see these develop over time. While arrears did not immediately show a decreasing trend during the first few months of the Program, as enrollments climbed, arrears began to drop significantly. Interestingly, LIRAP nearly completely bridged the gap between the two periods' arrears. The overall financial picture is becoming more favorable, and customers are more greatly benefitting. Although one year of data is insufficient to draw definitive conclusions, this trend suggests

that MED participation is effectively helping to prevent customers from falling into arrears and may also continue to have a positive impact on the Company's bad debt expense.

## Understanding Customer Demographics

Prior to the 2023-2024 PY, Agencies reported limited demographic data on the customers that participated in Avista's LIRAP Heat, Emergency Share and Energy Grant in order to provide basic insights into the participating customer base. This data included income and household size, home ownership vs. rental, and fuel type. With the transition from grant-based bill assistance to the bill discount, as well as the move towards joint administration, a new opportunity to better understand LIRAP recipients from a demographic perspective was presented. To fully realize this opportunity, Avista worked with its EAAG to establish a list of additional demographic characteristics that could add value and insight into the customers receiving LIRAP assistance each year. To collect this information, customers are asked if they would like to provide optional demographic information when they apply for MED, whether that be over the phone, online, via a paper application or during an appointment with their CAA.<sup>34</sup> Figure No. 4 below provides a visual of the information that is requested.

*Figure No. 4 – MED Application Optional Demographic Fields*

### DEMOGRAPHICS

To create a program that best serves our customers, the following optional demographic information would be appreciated. This voluntary information will be anonymous and will not impact your ability to receive assistance. Please select the boxes that best describe you as a participant in the My Energy Discount – Washington program:

**EDUCATION**  0-8 Grade  9-12 Non-High School Graduate  High School Graduate/GED  
 12+ Some Post-Secondary  2-4 Year College Graduate

**DO YOU IDENTIFY AS A PERSON WITH A DISABILITY OR OTHER LONG-TERM CHRONIC CONDITION?**  Yes  No

**MILITARY VETERAN**  Yes  No

**SENIOR OVER 60**  Yes  No

**RACE**  American Indian or Alaskan Native  Asian  Black or African American  
 Native Hawaiian or other Pacific Islander  White  Multi-Race  Other

**ETHNICITY** Hispanic or Latino  Yes  No

**PREFERRED LANGUAGE**  English  Spanish  Other (please note)

**HOUSING**  Own/Buy  Rent

**FUEL/HEAT SOURCE**  Electric  Natural Gas  Other  Don't Know

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<sup>34</sup> Auto-enrolled customers did not provide demographic information, as their enrollment was based on existing income/household size information that did not include demographics.



As noted in the customer application, the information customers provide is voluntary and does not impact their ability to receive assistance. The information is only ever reported anonymously, with Avista Customer Service Representatives (CSRs) having limited visibility.

### Geographic Location

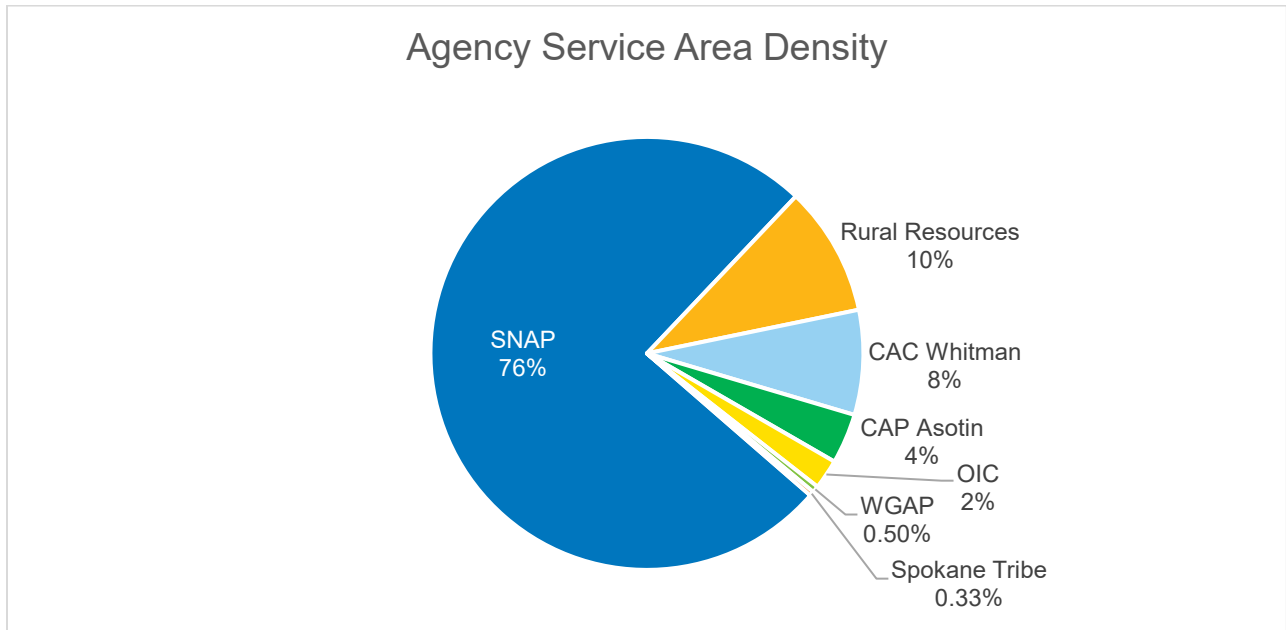
While not a part of this voluntary collection of demographics, information regarding the geographic location of LIRAP participants is also an important piece of data to help inform the overall energy assistance needs of Avista’s service territory and is analyzed in tandem with the specific demographics provided directly from customers. In total, Avista’s service territory in Washington consists of 12 counties – Adams, Asotin, Ferry, Franklin, Grant, Klickitat, Lincoln, Pend Oreille, Spokane, Skamania, Stevens and Whitman – as well as the residents of the Spokane Tribe of Indians’ Reservation, each of which serves a unique portion of the total Avista customers in Washington. The customer distribution within each of these counties, including their corresponding Agency, is illustrated in Table No. 13 below:

*Table No. 13 – Total Washington Avista Residential Premises by County*

Agency	County	Premise Count
CAC Whitman	Whitman	22,608
CAP Asotin	Asotin	10,824
OIC	Adams	6,081
	Franklin	311
	Grant	48
Rural Resources	Ferry	1,658
	Lincoln	4,570
	Pend Oreille	4
	Stevens	21,752
SNAP	Spokane	218,714
Spokane Tribe	Stevens (Spokane Tribe Reservation)	960
WGAP	Klickitat	921
	Skamania	512

Chart No. 13 below provides another look at this data, illustrating the distribution of customers throughout Avista’s service territory by Agency.

*Chart No. 13 – Agency Service Area by Density*



While this illustration provides a baseline for customer distribution across its entire Washington service territory, for purposes of LIRAP, the Company also looked at the distribution of potentially eligible customers (i.e., the 141,863 identified through Avista’s PBR Process) in comparison to those receiving LIRAP benefits across these same counties. Put more simply, are the dollars following the needs? Charts Nos. 14 and 15 below compare the distribution of estimated eligible customers within each Agency’s service territory to the distribution of LIRAP DS spend during the 2023-2024 PY.

Chart No. 14 – Estimated Eligible Premises by Agency Service Area

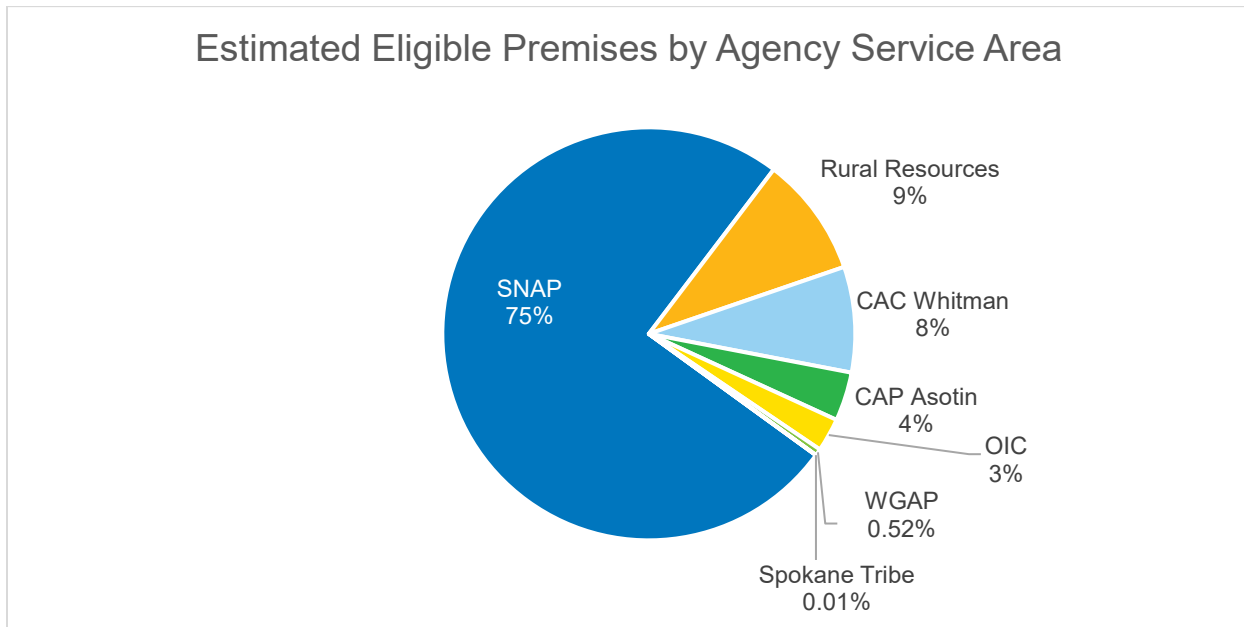
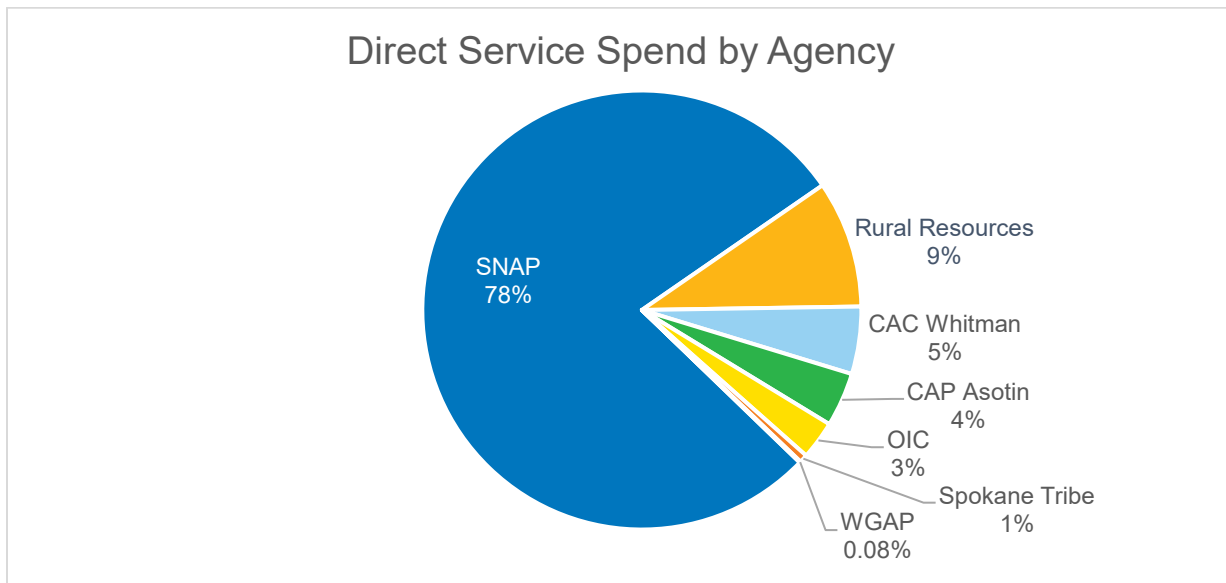


Chart No. 15 – Direct Service Spend by Agency – PY 2023-2024



Notable in this comparison is that, as a whole, the dollars are indeed following the need. In five of the seven counties, the direct service spend replicates the premise distribution within 0.5%, and for the two others, the difference is within 3%. The Company will continue to monitor this relationship between DS funding and premise distribution within each county to identify any significant disparities warranting further exploration or action.

## Additional Demographic Factors

As noted previously, demographic information is voluntarily provided by customers during their enrollment in LIRAP. During PY 2023-2024, a total of about 48,000 customers provided this optional information. Table No. 14 shows the response rates of these enrollees for various demographic categories.

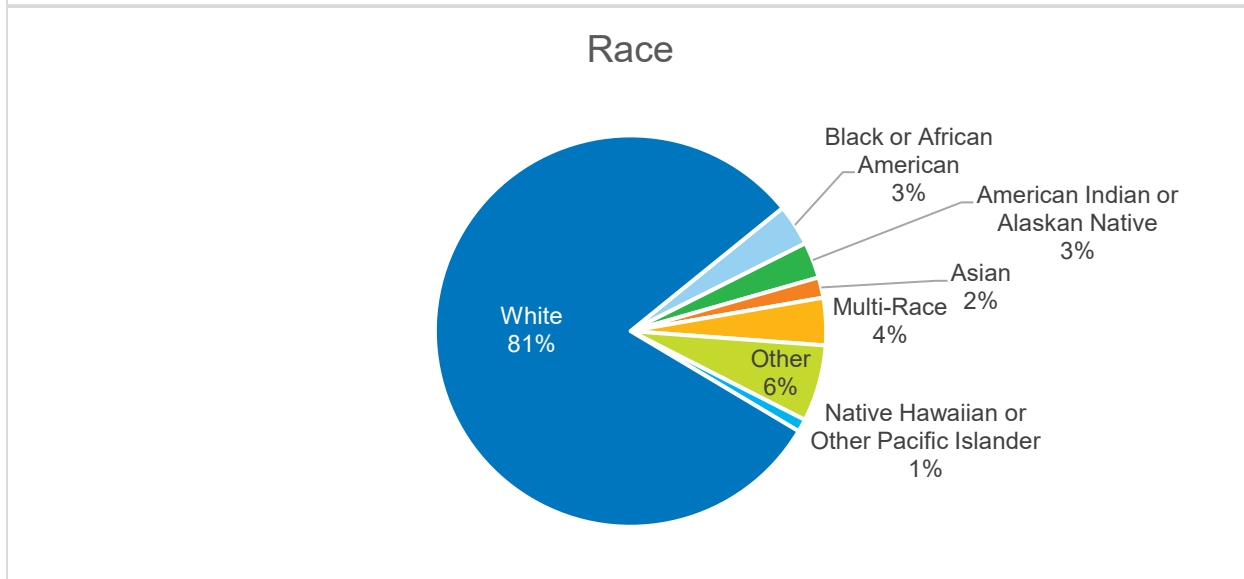
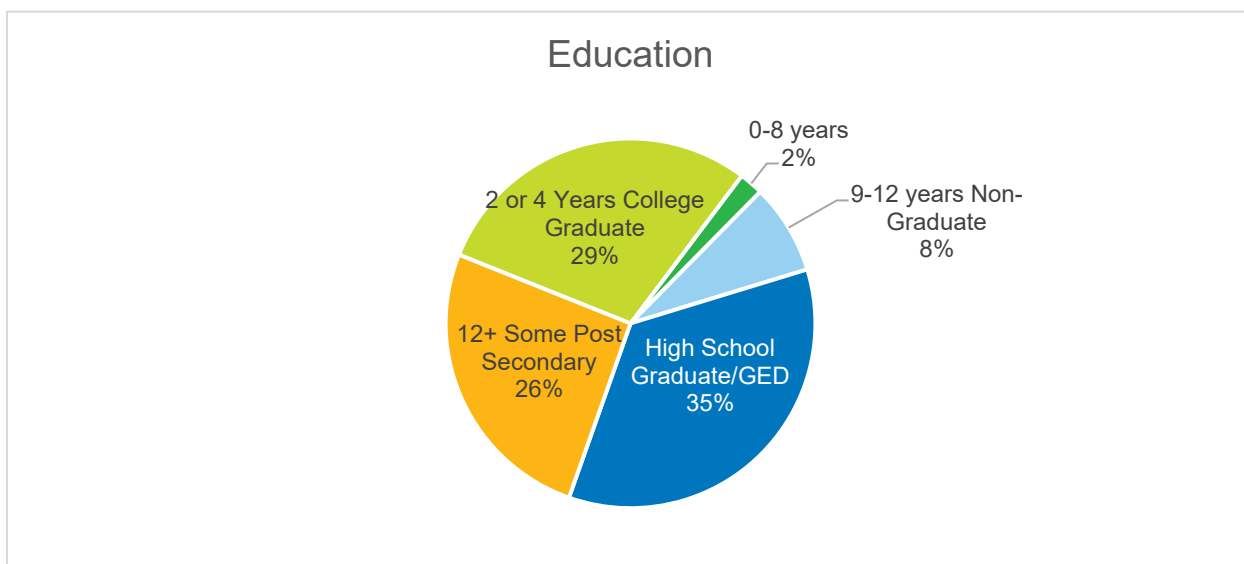
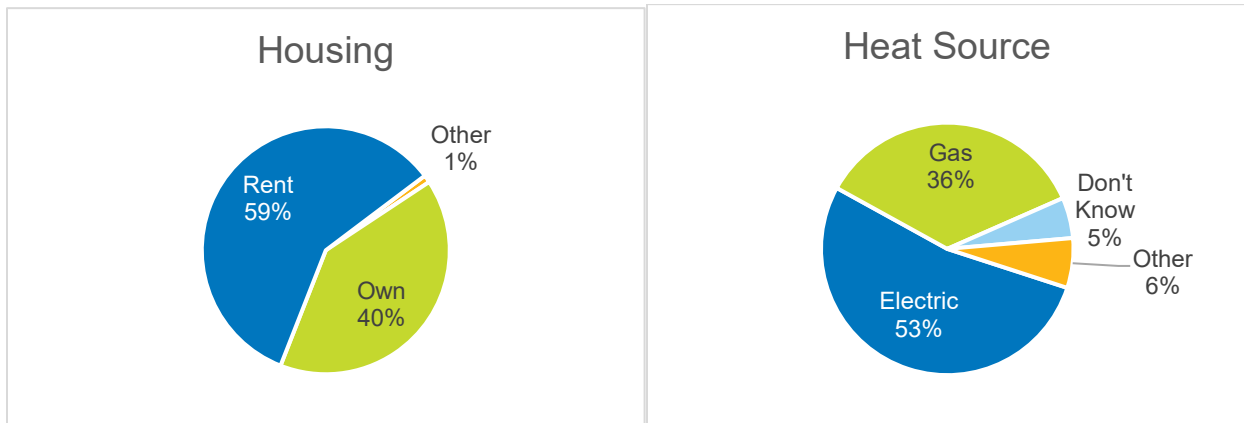
*Table No. 14 – Demographic Response Rates, October 1, 2023 - September 30, 2024*

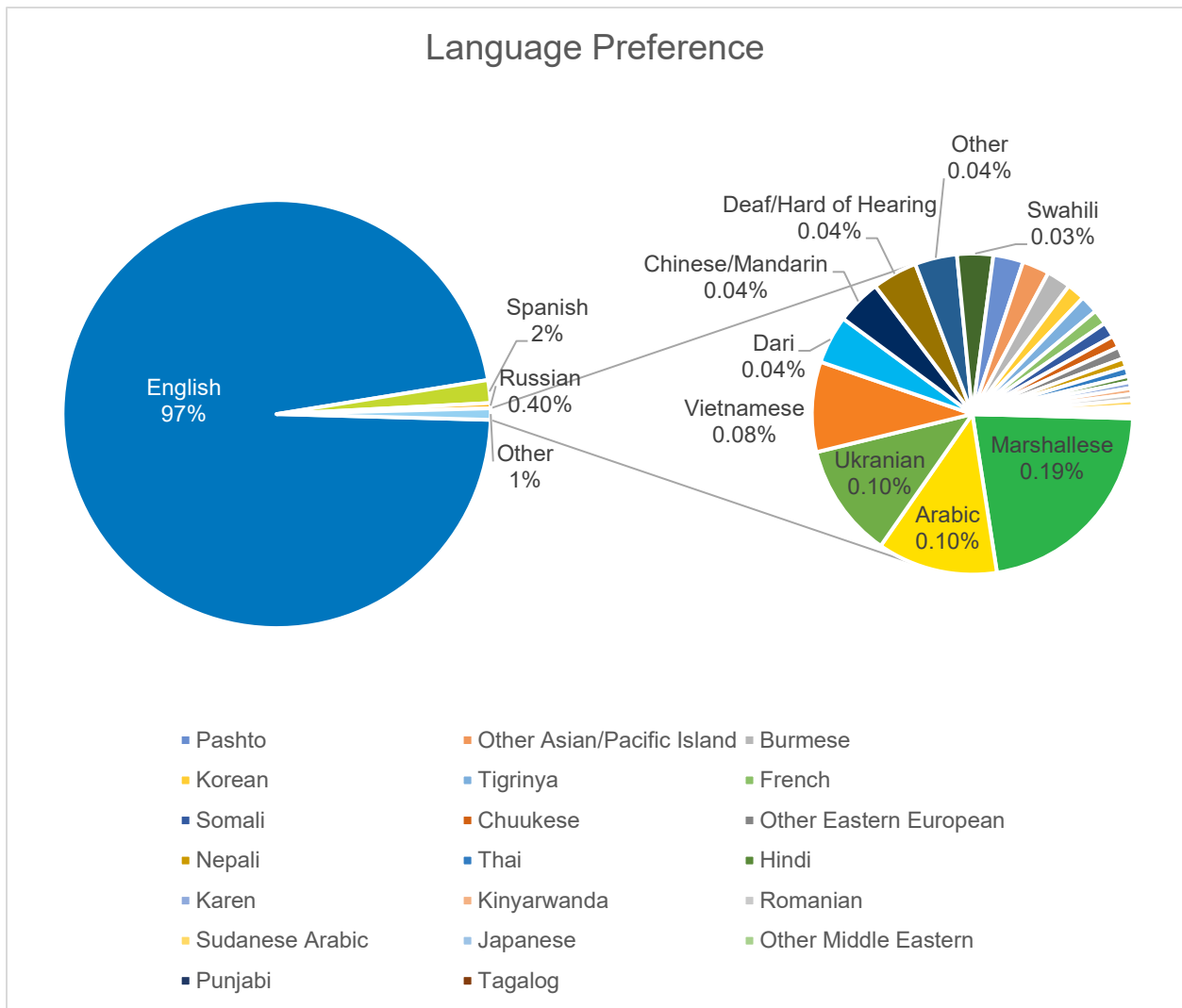
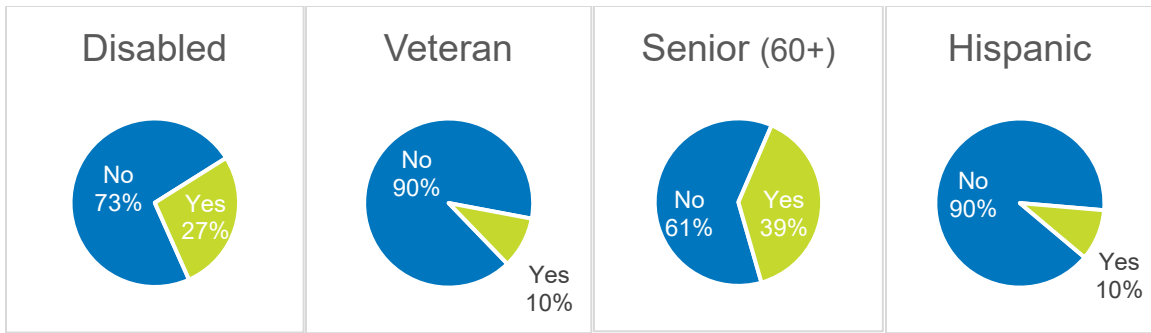
Demographic Category	Response Rate
<b>Housing (own/rent)</b>	95%
<b>Heat Source</b>	94%
<b>Education Level</b>	81%
<b>Disability Status</b>	83%
<b>Veteran Status</b>	84%
<b>Senior (60 or older)</b>	85%
<b>Race</b>	81%
<b>Ethnicity (Hispanic)</b>	78%
<b>Language Preference</b>	80%

Notable in the response rates is higher percentages for categories seemingly related to utility services – renter vs. homeowner and fuel sources – with a 94-95% average response rate. For demographic questions that may seem less related to utility services (or for some households, more private) – such as education, disability status, Veteran status, senior status, race, ethnicity and language preference – the response rate was notably lower at an average of just 82%. This presents a challenge for Avista in understanding how effectively we are reaching vulnerable and underrepresented populations and will continue to be an area of focus as we work to engage and support these populations through marketing and outreach.

Of those customers that responded to the optional demographic questions, 39% identified as seniors, 27% as living with a disability, and 10% as Hispanic – all with varying levels of education, race identities, and preferred languages. Chart No. 16 below provides an illustrative summation of the demographic information received from the approximately 48,000 LIRAP households that elected to share this information.

Chart No. 16 – LIRAP Household Demographic Responses





To better understand how some of these factors for MED enrollees compare to the broader population, Avista turned to Census data. This analysis revealed notable disparities between the voluntary participant results and the census profile of counties within Avista's service area. Renters, disabled individuals, and seniors are overrepresented among LIRAP participants, suggesting these groups are more engaged

or face specific needs that drive their participation in energy assistance. Conversely, Hispanic individuals, non-white individuals, and non-English speakers at home are underrepresented, indicating potential barriers such as language differences, cultural factors, or gaps in outreach efforts. These disparities highlight the need for more inclusive strategies and targeted outreach to ensure equitable representation and access to services for all community members.

*Table No. 15 – Census Profiles Compared to Participant Profiles in Avista’s WA Service Territory*

Demographic Category	Census Profile <sup>35</sup>	Participant Results
<b>Hispanic</b>	17%	10%
<b>Non-White</b>	25%	19%
<b>Renters</b>	35%	59%
<b>Disabled</b>	16%	27%
<b>Veterans</b>	8%	10%
<b>Senior (60+)</b>	8%	39%
<b>Non-English at Home</b>	11%	3%

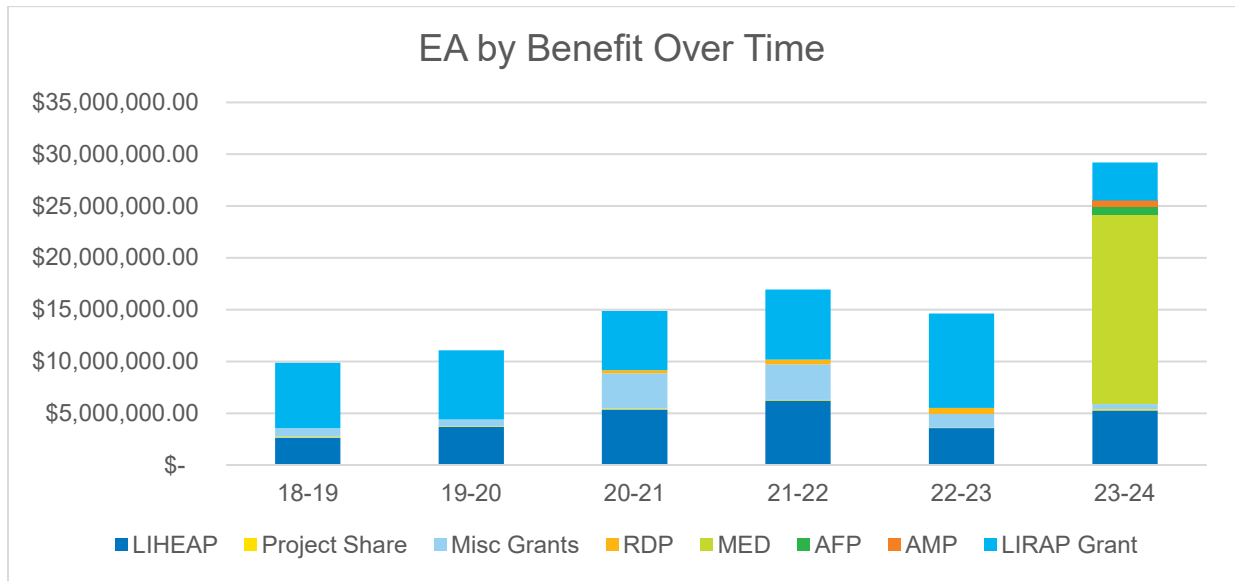
## The Broader Energy Assistance Landscape

LIRAP is one of several forms of energy assistance available to Avista customers to support their ability to pay ongoing energy costs. In addition to LIRAP, customers may have access to: Project Share, the donation-funded program that provides up to \$400 in energy assistance grants; miscellaneous grants from community-based organizations or special programs like the \$200 Washington Families Clean Energy Credit Grant Program; and/or LIHEAP, the federally funded program that provides income-qualified households with an energy assistance grant. The availability of these funds has fluctuated year-over-year, especially with the influx of miscellaneous grants and other assistance available during the COVID pandemic, yet the 2023-2024 PY brought unprecedented change to both the volume and variety of energy assistance available to customers, as well as to the total funds benefitting Avista customers. Chart No. 17 below illustrates this evolution of energy assistance over time.

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<sup>35</sup> Data retrieved from: [Census Bureau Profiles Results](#)

*Chart No. 17 – Energy Assistance Benefits by Type Over Time*



Evident in Chart No. 17 is the impact that MED has had on the energy assistance landscape, taking the total customer benefits to nearly \$30 million and nearly doubling what they had been in any previous year. LIHEAP funding also increased from the previous PY, providing just over \$5.25 million – about 118% of the six-year average – which is demonstrated in Table No. 16 below.

*Table No. 16 – Energy Assistance Benefits by Type Over Time*

Program Year	LIHEAP Funding	% of Six Year Average
2018-2019	\$ 2,633,339	59%
2019-2020	\$ 3,688,051	83%
2020-2021	\$ 5,362,372	120%
2021-2022	\$ 6,222,640	140%
2022-2023	\$ 3,563,358	80%
2023-2024	\$ 5,253,910	118%
<b>Average</b>	<b>\$ 4,453,945</b>	

While the LIHEAP funding has increased from previous years and is more than the six-year average, it represents only 87% of the \$6 million LIHEAP spend that was forecasted for PY 2023-2024. This forecast took into consideration that Avista-enrolled customers – particularly those customers that had never connected with their local Agency or received energy assistance – might be connected to LIHEAP as a result of the



referral process from Avista to the Agencies upon MED enrollment, thereby increasing LIHEAP throughput for Avista customers. Anecdotally, however, Agencies have shared that the more cumbersome process of applying for LIHEAP as compared to MED has led some customers to opt out of LIHEAP altogether; this was the case for both referred clients as well as for existing clients who simply felt that MED was offering enough relief, thereby rendering LIHEAP unnecessary. This might be contributing to the less-than-forecasted LIHEAP utilization in the 2024-2024 PY, although there is not enough data to make concrete conclusions. Avista will continue monitoring LIHEAP utilization as it applies to Avista customers and impacts LIRAP in the years to come.

# Program Funding

As previously noted, since the inception of LIRAP in 2002, revenues for the Program have been collected through Schedules 92 (electric) and 192 (natural gas), with funding collected through this mechanism then distributed to the Agencies for disbursement to customers and for the Agencies' Program implementation costs. To balance the timing of the Agencies' receipt of federal funding, which was often not confirmed until after the heating season had begun in October, Avista allowed LIRAP funding to carry over each year so that the Agencies would have assistance funding available should they need it prior to the arrival of their additional funding sources. Under this prior funding structure, LIRAP often maintained a carryover balance with amounts left unspent and undistributed to customers in need – or, in some cases, utilized in other indirect ways to assist customers.<sup>36</sup> While this carryover trend was more pronounced with the onset of the COVID-19 pandemic and the influx of funds available to customers in need, it still existed prior to the impacts of the pandemic. The funding structure that made this carryover possible worked for many years. However, with the conclusion of the 2022-2023 PY and the ensuing evolution of LIRAP's offerings and Program implementation process, the need arose to also begin evolving LIRAP's funding structure to meet the needs of customers, Agencies and the Company. This new structure, as well as the positive customer and administrative impacts it created, is outlined in the following section.

## New LIRAP Funding Structure

Again, the passage of CETA and SB 5295 catalyzed the transition of Avista's formerly grant-based LIRAP into a jointly implemented, income-based discount model with corresponding arrearage assistance options (AMP and AFP). With these changes, Avista knew that the prior revenue collection model for LIRAP would no longer provide the resources required to serve its vulnerable customers with the level of assistance

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<sup>36</sup> In collaboration and agreement with its EAAG, Avista utilized LIRAP carryover funding to commission its 2019 Low-Income Needs Assessment (LINA) completed by Evergreen Economics (January 3, 2020), and to fund its Automatic Hardship Grant in 2022 (see Docket Nos. UE-220565 and UG-220566).

needed. In order to best serve customers in this new LIRAP iteration, Avista implemented several mechanisms, which are summarized below:

**No Budget Restrictions.** LIRAP Schedules 92 and 192 have always functioned as a tariff rider with an annual true-up mechanism. In the 2023-2024 PY, Schedules 92 and 192 continued to function in the same way, but there was no longer a budget in place – the funding for LIRAP was there to holistically follow the actual energy assistance need within Avista’s service territory. In prior years, administering the Program solely through the CAAs sometimes left allotted budgets unspent, but by adding Avista as a direct administrator of its own Program in PY 2023-2024, as well as the expanded eligibility and increased accessibility discussed previously, the freedom to “meet customers where they are” financially provided for a more impactful Program Year.

**Proper Energy Burden Reduction.** While the lack of budget restrictions noted above is not permission for unlimited spending, the absence of a set budget threshold gave clearance to create data-driven discount tiers that could properly reduce the energy burden of participating customers and arrearage options that allow for whatever amount of assistance is needed – up to the approved benefit maximums, of course.

**Comprehensive Tracking of Actual LIRAP Costs.** Avista’s new LIRAP funding structure presented the first time that LIRAP administration *and* Program implementation costs, outside of those provided to the Agencies directly each year, were tracked and recorded in a way that more closely revealed the true financial impacts of offering LIRAP. While labor costs associated with the Program still exist outside of the LIRAP tariffs, these iterative changes provide a future streamlined process through which adjustments are made to the LIRAP rate to reflect a level more suited to the actual need being experienced by Avista customers each year (rather than an arbitrary budget amount).

## LIRAP Revenue

During the 2023-2024 Program Year, \$16,074,729 in electric revenue and \$8,861,089 of natural gas revenue was collected through Schedules 92 and 192, for a total of \$24,935,818.<sup>37</sup> With the expansion of LIRAP during this PY, customers were no longer bound to the existing guidelines established by Federal and State standards used

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<sup>37</sup> Includes funding for both LIRAP and the Senior/Disabled Rate Discount.

for LIHEAP, and instead gained access to a variety of LIRAP assistance through self-attestation, multiple venues through which to apply (i.e., joint implementation) and expanded income eligibility (i.e., up to the greater of 200% FPL and 80% AMI). As expected, and as reiterated throughout this Report, this removal of barriers had an outsized impact on Avista's ability to provide direct services to their customers through LIRAP, leading to total Program Year DS expenditure in the amount of \$24,078,590.

## Program Implementation and Delivery

While joint administration of LIRAP between both the Agencies and Avista brought about several changes, one aspect that did not change this first Program Year was the way in which the Agencies were funded. The Company spent much of the PY working with its EAAG to develop a new administrative structure that would better suit the new holistic budget of LIRAP<sup>38</sup> – as further discussed within the *Joint Program Implementation Funding Structure Subcommittee (JPFISS)* section – and, in the interim, continued to provide the Agencies with the budget funding allocations they were accustomed to receiving from LIRAP. Similar to previous years, a portion of the revenue collected for LIRAP was provided to the seven Agencies in Avista's Washington service territory to cover their Program implementation costs, including the necessary annual percentage increase. These Program implementation funds continue to be essential in supporting the Agencies in their ability to deliver LIRAP programs.

For this reporting Program Year, a total of \$2,402,188 was distributed to the Agencies for the purposes of program administration and implementation. This amount, in addition to the \$379,912 carry over from the previous program year, totaled \$2,782,100 available for the Agencies to use in the administration of LIRAP for 2023-2024. While Agencies may leverage other funding sources in the administration of LIRAP,<sup>39</sup> the amount of LIRAP-provided Program implementation funding utilized by the Agencies to support Program administration for 2023-2024 was \$2,489,839, which left an unspent balance of \$292,261 as of September 30, 2024. It should be noted that two of Avista's

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<sup>38</sup> In accordance with Section 24(b) of the Full Multiparty Settlement Stipulation, Final Order No. 10/04, Docket Nos. UE-220053, UG-220054, and UE-210854 (*Consolidated*).

<sup>39</sup> For example, if an Avista customer is receiving LIRAP, LIHEAP, and Project Share, the CAA may be subsidized by these other programs for Program Implementation costs in support of that same household.

partner Agencies did not report on their actual spending of Program implementation funds for the 2023-2024 PY; these Agencies received a combined total of \$11,899 for Program implementation, but it is unknown how much of this total was spent. Table No. 17 below represents a recap of the known Program implementation spent during the PY and the amount available at the end of the Program year.

*Table 17 – Program Implementation and Delivery Costs*

<b>Washington LIRAP Program Implementation Costs</b>	
<b>October 1, 2023 through September 30, 2024</b>	
Carried Over from Prior Year (2023-2023 PY)	\$379,912
Paid to Agencies This Program Year (2023-2024)	\$2,402,188
Net Funds Available For 2023-2024 PY	\$2,782,100
Funds Spent by Agencies	\$2,489,839
Unspent, September 30, 2024	\$292,261
Percent Unspent in Comparison to Available Funds	11%

## Conservation Education Staff & Labor Support

The Company budgets 4.2% of LIRAP funding each year to help support the administering Agencies’ labor related to the Conservation Education program. These funds are used to support the staffing and administration needs of each CAA, specifically for Con-Ed activities. Con-Ed funds are paid out in-full to the Agencies at the start of the program year, along with Administration & Program Delivery funds. For this program year, a total of \$611,464 was distributed to the Agencies for Con-Ed. This amount, including the \$215,239 carry over from the previous reporting program year, totaled \$826,703 available for Con-Ed.

At the end of the 2023-2024 PY, the known amount spent by the Agencies from LIRAP funds for Con-Ed was \$609,742, leaving an unspent Con-Ed balance of \$216,961. This funding has been distributed to the individual Agencies and, per their discretion, can be carried forward into the next reporting Program Year for future Con-Ed costs. It should be noted that two of Avista’s partner Agencies did not report their Con-Ed spending for the Program Year, and while they received a combined total of \$3,028 in Con-Ed funding,

it is unknown how much of these funds were spent. Table 18 below represents a recap of the Con-Ed spent and the amount available as of September 30, 2024.

*Table 18 – Conservation Education Staff and Labor*

Washington LIRAP Con-Ed October 1, 2023 through September 30, 2024	
Con-Ed Carried Over from Prior Year (2022-2023 PY)	\$215,239
Con-Ed Paid to Agencies This Program Year (2023-2024)	\$611,464
Net Funds Available for Con-Ed for 2023-2024 PY	\$826,703
Con-Ed Funds Spent by Agencies	\$609,742
Unspent Con-Ed, September 30, 2024	\$216,961
Percent Unspent in Comparison to Available Funds	26%

# Outreach & Engagement

## Engagement With Interested Parties

### Avista Energy Assistance Advisory Group

Also established as part of Order 07, Dockets UE-140188 et. al., Avista’s Energy Assistance Advisory Group, or EAAG, includes representation from Avista staff, The Energy Project, Commission Staff, Aging and Long-Term Care of Eastern Washington (ALTCEW), the Public Counsel Unit of the Attorney General’s Office (Public Counsel), Northwest Energy Coalition (NWECC), the Department of Commerce, and the Agencies that jointly administer LIRAP. The purpose of the EAAG is to monitor and explore ways to improve LIRAP by evaluating existing and alternative Program designs, to review administrative costs to ensure that more funding is directed toward meeting the Program’s goals, and to collaborate in establishing programs or ideas that may help to meet the current and future needs of Avista’s vulnerable populations. Due to the complexity of topics resulting from SB 5295 and CETA, as well as the necessity to report out on early programmatic results and emergent challenges, the EAAG met, at minimum, every other month during the 2023-2024 Program Year.

While the Advisory Group’s agenda has historically been focused on LIRAP-specific topics, recent legislation, as well as provisions stemming from Avista’s GRCs, the subject matters presented at each EAAG meeting have expanded to discussions ranging from renewables and electric vehicles to the energy assistance objectives of CETA or the Company’s Clean Energy Implementation Plan (CEIP),<sup>40</sup> including associated Customer Benefit Indicators (CBIs). The following table provides a listing of the EAAG meetings and the agenda topics that occurred during the 2023-2024 Program Year:

Meeting Date	2023-2024 Program Year Agenda Topics
11/14/23	<ul style="list-style-type: none"><li>• <i>My Energy Discount</i> – Launch Update</li><li>• Finalize the LIRAP Reporting Plan</li><li>• Establish a Subcommittee for Joint Implementation</li></ul>

<sup>40</sup> See Docket No. UE-210628.

	<ul style="list-style-type: none"> <li>• Review short-term EAAG discussion topics</li> </ul>
<b>1/9/24</b>	<ul style="list-style-type: none"> <li>• Clean Energy Implementation Plan, Biennial Report Update</li> <li>• Update: LIRAP Policy/Procedure Changes <ul style="list-style-type: none"> <li>○ Arrearage Interface</li> <li>○ Income verification for increases in income.</li> </ul> </li> <li>• EAAG Subcommittee Formation (continued)</li> </ul>
<b>3/12/24</b>	<ul style="list-style-type: none"> <li>• Avista Grants &amp; Community Benefits Plan Brainstorm</li> <li>• EAAG Subcommittee Update</li> <li>• Defining our EAAG Purpose, Values &amp; Goals</li> </ul>
<b>5/14/24</b>	<ul style="list-style-type: none"> <li>• EAAG Members &amp; Mission</li> <li>• Bill Assistance Program Performance Update</li> <li>• Joint Administration Funding Structure Subcommittee (JAFSS) Update<sup>41</sup></li> </ul>
<b>7/9/24</b>	<ul style="list-style-type: none"> <li>• Update: WA Families Clean Energy Credit Grant Program</li> <li>• Joint Program Implementation Funding Structure Subcommittee (JPIFSS) Update<sup>42</sup></li> <li>• MED-WA Customer Survey Results</li> </ul>
<b>8/21/24</b>	<ul style="list-style-type: none"> <li>• Ad hoc meeting to review the JPIFSS proposal put forth by the Subcommittee</li> </ul>
<b>9/9/24</b>	<ul style="list-style-type: none"> <li>• JPIFSS Update: Reminder of LIRAP filing and timeline for distribution of funds pending approval.</li> <li>• LIRAP Funding Update</li> <li>• LIRAP Data Collection &amp; Reporting: Review &amp; Provide Feedback</li> </ul>

As noted in the March 12<sup>th</sup> agenda above, one of the exercises that the EAAG engaged in was to establish a shared Purpose Statement, Values, and Goals. Figure No. 5 below illustrates the result of that exercise.

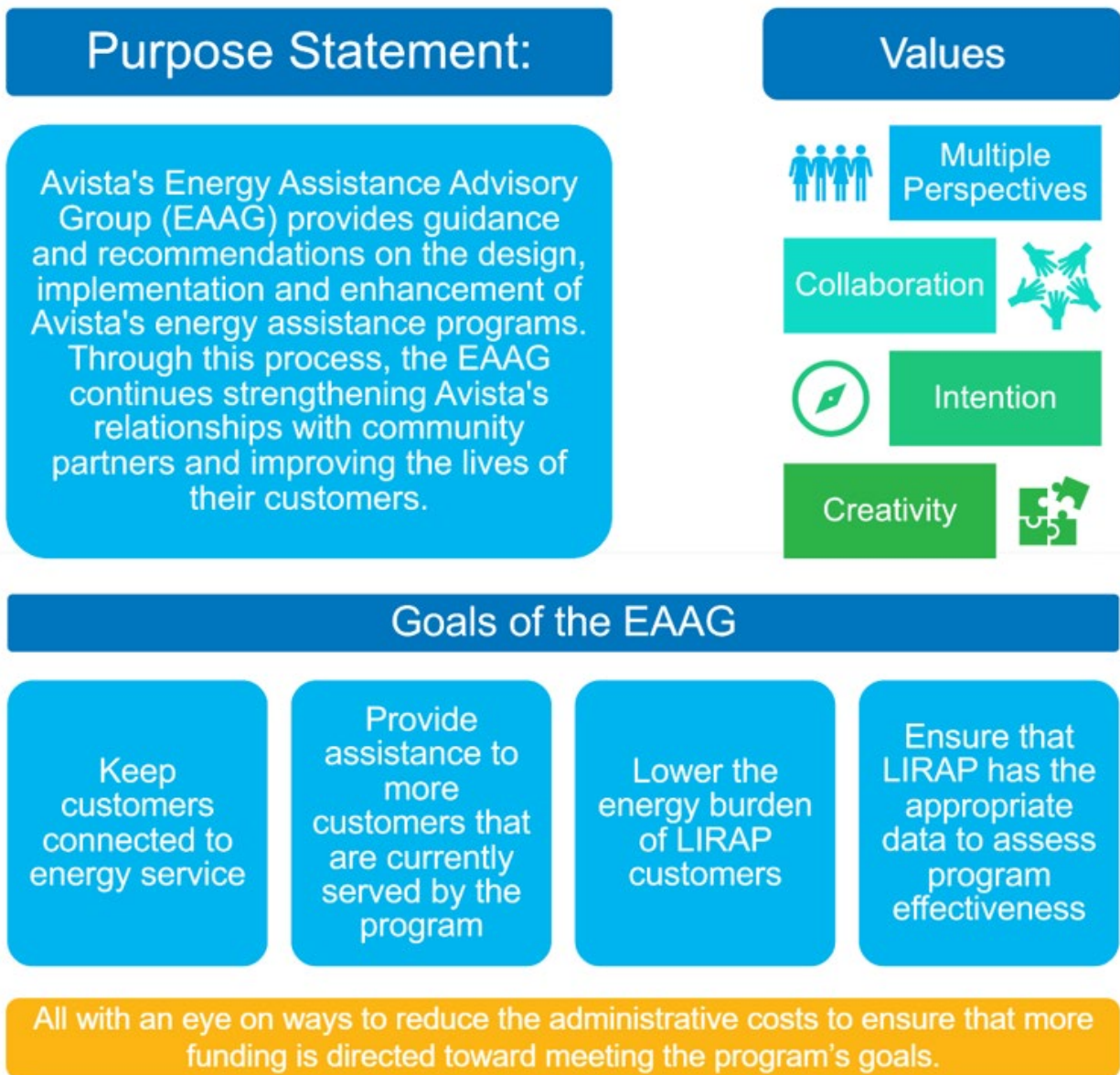
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<sup>41</sup> It was as of this meeting that the subcommittee had adopted the name above.

<sup>42</sup> Throughout conversations regarding implementing a new CAA compensation structure, the Agencies noted that they favored the term “Program Implementation” rather than “Administration” or “Admin” when referring to the funding needed/used to administer LIRAP. As a result of this feedback, these terms have been replaced with “Program Implementation” wherever possible. which is the term used throughout this Report.



Figure No. 5 – Energy Assistance Advisory Group Purpose, Values & Goals



### Joint Program Implementation Funding Structure Subcommittee (JPIFSS)

The 2022 GRC Settlement mandated Avista to *collaborate with its EAAG to determine the appropriate method, amounts and administrative structure for future program years [beyond 2023-2024.]*<sup>43</sup> This resulted in the formation of an EAAG “Subcommittee” in March 2023, which was comprised of interested members of the

<sup>43</sup> Docket Nos. UE-220053, UG-220054 and UE-210854 (consolidated); Final Order 10/04, Appendix A, "Full Multiparty Settlement Stipulation".

EAG, facilitated by Hassan Shaban of Empower Dataworks and had the goal of designing this new Program implementation funding structure for future Program Years of joint administration (i.e., Avista and Agencies). This group convened virtually for the first two meetings in March and April 2023, with the time spent focused on establishing a community agreement for the Subcommittee's work together, clarifying the purpose and goals of their group, and building a shared understanding of the current state. Then, in May 2023, Hassan met directly with each Agency, as well as Avista staff, to conduct individual informational interviews. Hassan used the information gathered within these interviews, as well as other industry-related insights, to develop a strawman proposal for the new joint Program implementation model, intended to be more data-driven and appropriate than its arbitrarily-set predecessor.<sup>44</sup> The proposal was presented to the Subcommittee during an in-person workshop in June of 2023, where the group spent several hours reviewing the proposal in detail, making recommendations, and determining what gaps or additional details and considerations needed to be made within the proposal. July 2023 contained a Subcommittee debrief of the June workshop, the distribution of a second version of the proposal, and the opportunity for all Subcommittee members to provide written comments on the updated proposal. With feedback integrated and a final proposal completed, the Subcommittee disassembled in August 2023. This Subcommittee was highly collaborative and engaged, which led to a final proposal that all parties were in support of. This proposal was filed with the Commission on August 30, 2024 as part of the Company's annual LIRAP rate adjustment and approved by the UTC in November 2024.<sup>45</sup>

## Agency Collaboration

Throughout the 2023-2024 PY, Avista representatives also facilitated monthly meetings with Agencies' Energy staff to provide an opportunity to ensure alignment between the Company and its Agency partners as they launched joint administration of LIRAP. The meetings often included general updates from Agency Energy Staff, Program

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<sup>44</sup> Prior to the Subcommittee's work, Agencies' Program Implementation budgets we set based on a certain percentage of the overall LIRAP budget, distributed based on meter count within each CAA's service area, and arbitrarily increased by the greater of 7% or 2x the base revenue increase for each GRC.

<sup>45</sup> See Docket Nos. UE-240651 and UG-240652.

reporting from Avista, and discussion around current energy assistance issues or topics of interest. Specific subjects discussed during the 2023-2024 PY included: recommended data collection and reporting; exploring better alignment between LIRAP and LIHEAP and their respective income sources; post-enrollment verification; the Washington Families Clean Energy Credit Grant Program<sup>46</sup> and how customers can access it; and presentation of the proposed Joint Program Implementation Funding Structure.

During the 2023-2024 PY, Avista also initiated a feedback cycle in April 2024, framed as a “LIRAP Midyear Check-In”, through which to gain insight into the Agencies’ experiences and how Avista might enhance or improve existing or future processes. This anonymous survey was available to all Agency partners and their staff and was structured to collect feedback in 4 distinct categories – Marketing & Outreach, Program Design, Program Delivery, and Agency-Avista Collaboration. For each of these categories, respondents were asked to answer three simple questions:

1. Start: What would you like to see started, added, or integrated into existing efforts? i.e. what are we *not* already doing that we *should* be doing?
2. Stop: What do you think should no longer be part of our existing efforts, as it is ineffective, unimportant, etc.? i.e. what are we doing that we should *not* be doing anymore?
3. Continue: What would you like to see continued on from existing efforts? i.e. what are we doing well that we should *definitely* continue to do?

Avista gleaned several insights from the feedback submitted by the Agencies. Agency staff made recommendations around improving outreach, including strategies like collaborating with low-wage employers and community groups, creating and sharing a comprehensive outreach calendar, targeting outreach using Census Tract data, and focusing on senior housing. They also highlighted some of the user experience issues with Avista’s Energy Assistance Workbench (EAWB), particularly the inability to view accounts with multiple premises. Avista responded to this recommendation with an EAWB update in September 2024 that makes these accounts available for viewing rather than having to call Avista’s CARES team to access them. Further recommendations involved improving guidelines for income verification – including veterans’ pay and self-

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<sup>46</sup> See pgs. 16-17 of the Report for further details about the Washington Families Clean Energy Credit Grant Program.

employment as well as required verification for higher discount tiers – and increasing joint trainings and meetings between Agency Staff and Avista as additional opportunities for feedback and coordination.

Avista collected and summarized the actionable feedback, and then presented it at a monthly Avista-Agency meeting in July 2024, noting (1) the ability for the recommendation to be implemented and (2) if implementable, the timeline in which that would occur. The Company intends to continue collecting feedback in this way to ensure continuous process improvements are being made regularly where possible.

## Avista Outreach & Engagement

### Marketing Strategy

With the launch of MED and the expanded accessibility of LIRAP programs through Avista, the Company launched a marketing campaign in October 2023 that continued throughout the PY 2023-2024 to promote the availability of bill assistance and payment options across multiple owned and external communication channels. Such communications typically use a call-to-action<sup>47</sup> that directs customers to the Company's website, or to contact Avista directly. In the 2023-2024 PY, Avista worked to streamline its assistance-related webpages; content was adjusted to a sixth grade reading level and call-to-actions were updated to direct customers to "Apply Now", "Let us Help", or "Start Saving". With the help of customer user experience testing, navigation of web pages was also improved. Additionally, in May 2024, Avista implemented a Spanish translation plug-in on its website, making bill assistance information and resources easily accessible to more customers. As a result, Avista's assistance webpage consistently landed in the top 50 most-viewed webpages on the Company's site, which houses over 1,600 separate pages. Between October 1, 2023 and September 30, 2024, the general assistance webpage earned over 93,000 views, and the Washington-specific assistance webpage earned over 38,000 views.

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<sup>47</sup> Call-to-actions (CTAs) are short, clear phrases that encourage the reader to take a specific action. For MED, these CTAs are intended to encourage them to apply.


In addition to web enhancements, the Company sent bill assistance inserts or included bill assistance messages within multiple customer communications throughout the 2023-2024 PY. Bill assistance inserts were included with all Washington residential customer bills in October and December 2023, as well as July 2024, totaling over 457,000 inserts sent. On-bill messaging promoting assistance resources was also utilized. Further, bill assistance messages are routinely included in the Company's monthly customer newsletter, titled *Connections*. Between October 1, 2023 and September 30, 2024, bill assistance promotion messages were included in the newsletters 10 separate times, with either the print or electronic version reaching all Washington residential customers. Those not enrolled in paperless billing receive the print version as an insert with their bill, while those enrolled in paperless receive a digital email version. Some of the key messages featured in the *Connections* newsletter are displayed here.


**A new bill discount program for Washington customers**

Avista has a new program called My Energy Discount to help Washington customers with their bills. If you're eligible for the discount, you'll save money every month.

Even if you couldn't get help with your bill before, you might be able to now. It's easier to qualify and no paperwork is required to apply. All you have to do is tell us your household's size and income. If you're approved, your discount is good for two years. Even better, you can still benefit from all the other programs and services your local community action agency offers, including other types of payment assistance and home improvement help.

Visit [myavista.com/myenergydiscountWA](http://myavista.com/myenergydiscountWA) to learn more and fill out our simple online form to apply now. Or give us a call at (800) 227-9187.





**Need help with your energy bills?**

We're here for you. Everything around us is becoming more expensive, challenging household budgets. If your paycheck isn't stretching as far as it used to, making it hard to manage your energy costs, we understand. Maybe you're unable to work, or you're simply having a hard time getting ahead – whatever the reason, we're here to assist.

Avista offers options that can relieve the stress of high winter energy use. If you're looking for ways to get caught up on or pay your bill, control or lower your monthly energy costs, here are some possible solutions:

- **Comfort Level Billing** - Divides your yearly energy usage into 12 equal payments, so you pay the same amount each month!
- **Preferred Due Date** - Aligns your bill's due date with your payday, giving you more control over when you need to make your payment!
- **Payment Arrangements** - Short-term and long-term payment plans to help you catch up on past due charges!
- **Hardship Grants** - Immediate financial help for your bill is made possible by Avista, but offered through local community action agencies.
- **Energy Assistance Grants** - Seasonal or annual financial help for your bill.
- **Energy Saving Home Upgrades** - Projects such as added insulation or a new furnace and water heater, are made possible by Avista, but offered through local community action agencies!
- **Rental, Food, Transportation and more** - Local community action agencies offer programs to help with non-energy needs!

Eligibility varies by account. Taxation and other restrictions may apply.


[Continued on back](#)

**Looking for energy bill help?**

**Need help with your energy bill?**

Avista partners with local community agencies to help customers with their energy costs. In Washington, income-eligible customers can now qualify for a new monthly bill discount program called My Energy Discount. In Idaho, financial assistance may be available through your local community action agency. Learn more about your options at [myavista.com/assistance](http://myavista.com/assistance) or by calling us at (800) 227-9187.

Let us help.



**Need help with your energy bill? We want to help you.**

Helping our customers manage energy use and costs is important to us. From financial assistance to home energy upgrades, we're partnering with local community agencies across our service territory to provide options that address customer needs.

In **Washington**, tens of thousands of Avista customers are now eligible for My Energy Discount, a new bill discount program that lowers energy costs every month. Enrolling is quick and easy, with no paperwork or appointments required.

In **Idaho**, billing and energy-saving help is made available through local community agencies.

Learn more about your options below.

[Apply Now](#)

**Need help with your energy bills?**

We're here for you. Everything around us is becoming more expensive, challenging household budgets. If your paycheck isn't stretching as far as it used to, making it hard to manage your energy costs, we understand. Maybe you're unable to work, or you're simply having a hard time getting ahead – whatever the reason, we're here to assist.

Avista offers options that can relieve the stress of high winter energy use. If you're looking for ways to get caught up on or pay your bill, control or lower your monthly energy costs, here are some possible solutions:

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- **Payment Arrangements** - Short-term and long-term payment plans to help you catch up on past due charges!
- **Hardship Grants** - Immediate financial help for your bill is made possible by Avista, but offered through local community action agencies.
- **Energy Assistance Grants** - Seasonal or annual financial help for your bill.
- **Energy Saving Home Upgrades** - Projects such as added insulation or a new furnace and water heater, are made possible by Avista, but offered through local community action agencies!
- **Rental, Food, Transportation and more** - Local community action agencies offer programs to help with non-energy needs!

Eligibility varies by account. Taxation and other restrictions may apply.

[Continued on back](#)

Between November 30, 2023 and March 31, 2024, Avista ran a paid bill assistance advertising campaign promoting billing and payment options and aiming to increase customer awareness of available support. Promotional placement lived on Avista's website, its customer-facing blog, and across its social media accounts. Paid ads ran

digitally and in print form, in both English and Spanish, achieving over 10.75 million total impressions and over 22,000 total clicks.

Additionally, Avista implemented a robust marketing plan to specifically promote MED; the strategy behind these communication efforts was developed through a collaborative process involving Agency input, customer feedback on existing bill assistance program messaging, suggestions from Avista’s EAAG, and more. Key message points, imagery and marketing tactics were identified to resonate with MED’s target audience. MED communications were also translated into Spanish, Marshallese, Russian and Ukrainian, making it easier for non-English speaking customers to connect with LIRAP. Communication included paid and unpaid efforts, such as website and social media promotion, community newsletter placement, press releases, digital display and search ads, print ads, direct emails, bill inserts, and more. Paid communications were targeted to customers identified as likely eligible using characteristics including (but not limited to) military veterans, single parents, mobile homes, renters, social security income, disability, unemployment, low credit score, seniors, apartment dwellers, etc.

In total, paid English and Spanish print, digital and search efforts achieved over 86 million impressions and over 280,000 clicks. Unpaid efforts were also successful, with the MED webpage earning over 432,000 total views, as well as direct customer emails surpassing over 683,000 sends. Examples of MED collateral and advertising are shown in Figures Nos. 6 through 8 below.

Figure No. 6 – My Energy Discount Rack Cards in English, Spanish & Marshallese

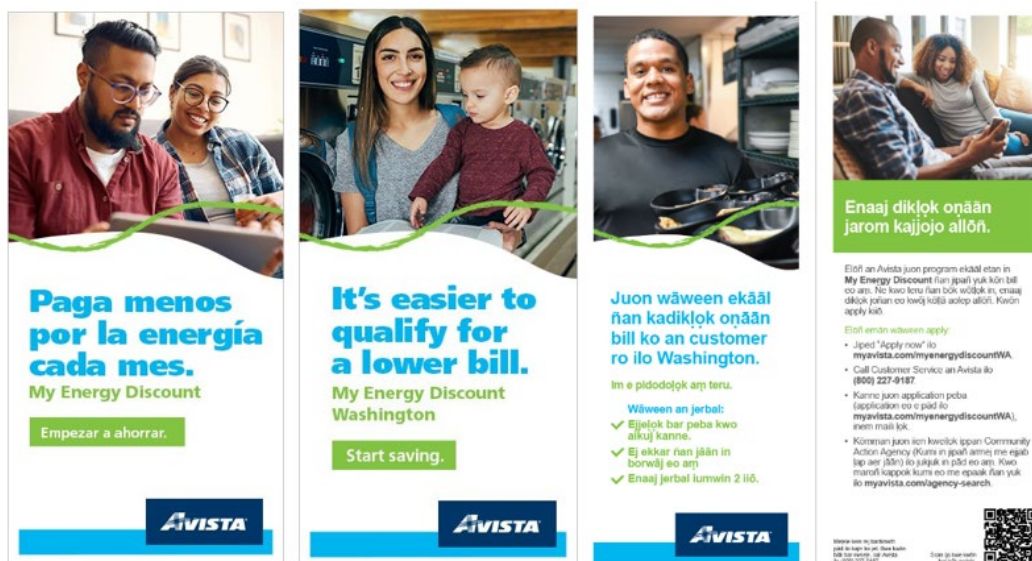


Figure No. 7 – My Energy Discount Flyer, Front & Back



**A new bill discount for Washington customers.**

**And it's easier for you to qualify.**

Avista has a new program called My Energy Discount to help with your bill. If you get the discount, you'll save money every month. Apply now.

**4 simple ways to apply:**

- Click "Apply now" at [myavista.com/myenergydiscountWA](http://myavista.com/myenergydiscountWA).
- Call Avista's Customer Service at (800) 227-9187.
- Fill out a paper application (get it at [myavista.com/myenergydiscountWA](http://myavista.com/myenergydiscountWA)), then mail it.
- Set up a meeting with your local Community Action Agency. You can find an agency near you at [myavista.com/agency-search](http://myavista.com/agency-search).

**How it works:**

- ✓ No paperwork.
- ✓ Based on income.
- ✓ Good for two years.

© 2018 Avista. All rights reserved. For details, call 800.227.9187.



**See if your household income qualifies:**

Look for your county on the left side of the chart. Then find the number of people living with you along the top row. Where the two rows meet, you'll find the most money your whole household can earn each month or year and still qualify.

County	Income Reporting	1 Person	2 Person	3 Person	4 Person	5 Person	6 Person	7 Person	8 Person
Adams	Monthly	\$3,900	\$4,454	\$5,013	\$5,567	\$6,013	\$6,713	\$7,570	\$8,427
	Annual	\$46,800	\$53,450	\$60,150	\$66,800	\$72,150	\$80,560	\$90,840	\$101,120
Asotin	Monthly	\$3,954	\$4,517	\$5,083	\$5,645	\$6,100	\$6,713	\$7,570	\$8,427
	Annual	\$47,450	\$54,200	\$60,900	\$67,750	\$73,200	\$80,560	\$90,840	\$101,120
Bury	Monthly	\$4,300	\$4,854	\$5,413	\$5,967	\$6,413	\$6,713	\$7,570	\$8,427
	Annual	\$46,800	\$58,450	\$64,950	\$71,600	\$77,150	\$80,560	\$90,840	\$101,120
Franklin	Monthly	\$4,313	\$4,929	\$5,546	\$6,158	\$6,854	\$7,148	\$7,838	\$8,427
	Annual	\$51,750	\$59,150	\$66,550	\$73,900	\$79,850	\$85,750	\$91,650	\$101,120
Grant	Monthly	\$3,938	\$4,500	\$5,063	\$5,621	\$6,071	\$6,713	\$7,570	\$8,427
	Annual	\$47,250	\$54,000	\$60,750	\$67,050	\$72,850	\$80,560	\$90,840	\$101,120
Klickitat	Monthly	\$3,900	\$4,454	\$5,013	\$5,567	\$6,013	\$6,713	\$7,570	\$8,427
	Annual	\$46,800	\$53,450	\$60,150	\$66,800	\$72,150	\$80,560	\$90,840	\$101,120
Lincoln	Monthly	\$3,900	\$4,454	\$5,013	\$5,567	\$6,013	\$6,713	\$7,570	\$8,427
	Annual	\$46,800	\$53,450	\$60,150	\$66,800	\$72,150	\$80,560	\$90,840	\$101,120
Pend Oreille	Monthly	\$3,900	\$4,454	\$5,013	\$5,567	\$6,013	\$6,713	\$7,570	\$8,427
	Annual	\$46,800	\$53,450	\$60,150	\$66,800	\$72,150	\$80,560	\$90,840	\$101,120
Skamania	Monthly	\$5,263	\$6,017	\$6,767	\$7,517	\$8,121	\$8,721	\$9,321	\$9,925
	Annual	\$63,150	\$72,200	\$81,200	\$90,200	\$97,490	\$104,690	\$111,850	\$119,100
Spokane	Monthly	\$4,154	\$4,750	\$5,342	\$5,933	\$6,408	\$6,883	\$7,570	\$8,427
	Annual	\$49,850	\$57,000	\$64,100	\$71,200	\$76,900	\$82,600	\$90,840	\$101,120
Stevens	Monthly	\$3,900	\$4,454	\$5,013	\$5,567	\$6,013	\$6,713	\$7,570	\$8,427
	Annual	\$46,800	\$53,450	\$60,150	\$66,800	\$72,150	\$80,560	\$90,840	\$101,120
Whitman	Monthly	\$3,948	\$4,508	\$5,071	\$5,633	\$6,088	\$6,713	\$7,570	\$8,427
	Annual	\$47,250	\$54,100	\$60,850	\$67,600	\$73,050	\$80,560	\$90,840	\$101,120

income-packets-03/2018



**Additional help is available:**

Your local community action agency may be able to help you with home weatherization, heating system improvements, rent and bill assistance, food and transportation, doing taxes and more. Find an agency near you at [myavista.com/agency-search](http://myavista.com/agency-search).

\*Year of 2018 used for all figures unless otherwise specified.



Figure No. 8 – My Energy Discount Customer Email Example

**Dear Customer,**

We've launched a new program to help our Washington customers with their bills. Introducing **My Energy Discount**.

**If you're eligible, you'll save money every month.**

- It's easier to qualify.
- No paperwork is required to apply.
- If approved, your discount is good for two years.

**Even if you couldn't get energy bill assistance before, you might be able to now.** All you have to do is tell us your household's size and income.

**Applying is easy and takes just a few minutes.** Go to [myavista.com/myenergydiscountWA](http://myavista.com/myenergydiscountWA) to see if you're eligible and fill out our simple online form. If you need help or have questions, please call us at **(800) 227-9187**.

Sincerely,

**Avista**

Between June 2024 and August 2024, MED received an additional promotional assist, thanks to Washington’s one-time \$200 Clean Energy Grant program (as discussed on pgs. 16-17). Because the characteristics required for eligible grant customers aligned with those of MED, Avista took the opportunity to couple its marketing for the Clean Energy Grant with that of the MED to further incent customers to pursue assistance. Supplemental marketing efforts were developed to educate customers about the one-time grant opportunity and implemented across communication channels like radio,



**Get a monthly bill discount.**

Washington electric customers: **Enroll now and get an extra \$200 credit.\***

Paying less for energy each month is easier than ever. Apply for Avista’s **My Energy Discount** today!

- ✓ No paperwork.
- ✓ No appointments.
- ✓ Good for two years.

It’s easy to apply. Call **(800) 227-9187** or go to **myavista.com/myenergydiscountWA**. (Una traducción al español de esta información está disponible en el sitio web.)

This information is available in alternate languages. For details, call Avista at (800) 227-9187.

**AVISTA**

Limited time \$200 Clean Energy Grant bill credit will be automatically applied to your Avista account upon My Energy Discount enrollment. The Clean Energy Grant is supported with funding from Washington’s Climate Commitment Act. The CCA supports Washington’s climate action efforts by putting up-and-earned dollars to work: reducing climate pollution, creating jobs, and improving public health. Information about the CCA is available at [www.climate.wa.gov](http://www.climate.wa.gov). Grants available through September 15, 2024 or until funding runs out, whichever comes first.



**Get a monthly bill discount.**

Washington electric customers, enroll in **My Energy Discount. Hurry! Get a \$200 bonus!\***

- ✓ No paperwork.
- ✓ No appointments.
- ✓ Good for two years.

Sign up now at **myavista.com/myenergydiscountWA** or call **(800) 227-9187**.

Una traducción al español de esta información está disponible en el sitio web.

**AVISTA**

Limited time \$200 Clean Energy Grant bill credit will be automatically applied to your Avista account upon My Energy Discount enrollment. The Clean Energy Grant is supported with funding from Washington’s Climate Commitment Act. The CCA supports Washington’s climate action efforts by putting up-and-earned dollars to work: reducing climate pollution, creating jobs, and improving public health. Information about the CCA is available at [www.climate.wa.gov](http://www.climate.wa.gov). Available through September 15, 2024 or until funding runs out.

college publications, and transit stops – approaches which traditional MED marketing did not encompass.

In addition to the more broadly distributed marketing and outreach efforts, Avista’s senior customers were among those demographics targeted for Avista’s paid bill assistance and *My Energy Discount* campaigns. Avista also ensured messaging for these populations was present in community resource publications and at resource events that seniors trust. During the 2023-2024 Program Year, senior print advertisements were placed in promotions for the Active Senior Living Event, as well as the Innovaging Senior Directory and Fig Tree Directory. Examples of the advertisements are shown below.



Figure No. 9 – My Energy Discount Senior Print Advertisement



**A new bill discount for Washington customers.**  
**Save monthly with My Energy Discount.**

- ✓ Based on income.
- ✓ No paperwork.
- ✓ Easier to qualify.
- ✓ Good for two years.

Apply now at [myavista.com/myenergydiscountWA](https://myavista.com/myenergydiscountWA). Just fill out the online application or print and mail a copy. Or call our customer service at (800) 227-9187. You can also meet with your local Community Action Agency. Find yours at [myavista.com/agency-search](https://myavista.com/agency-search).

Scan for more information.



This information is available in alternate languages. For details, call Avista at (800) 227-9187.

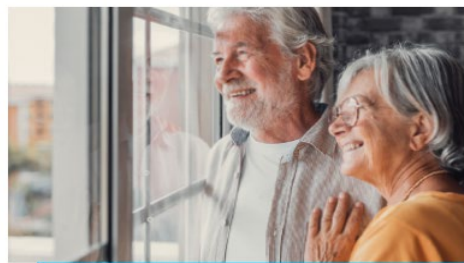



**A new bill discount for WA customers.**  
**My Energy Discount**

Start saving.



Figure No. 10 – General Energy Assistance Senior Print Advertisements



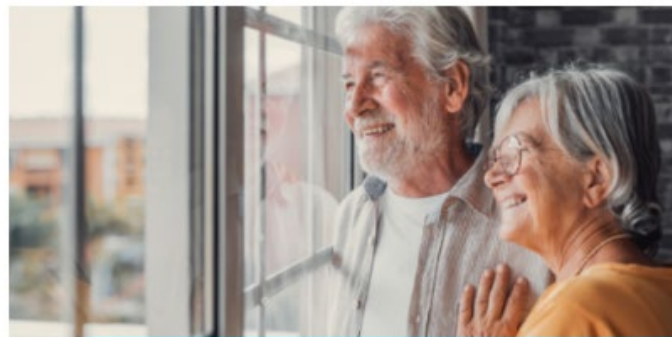
## Need help with your energy bills?

We're here for you.

Avista works with local community agencies to provide financial assistance for energy costs. Plus, we can help you manage your energy usage and monthly payments. Some programs are income qualified.

- **Comfort Level Billing**  
(Bills averaged over 12 months)
- **Payment Arrangements**
- **Preferred Due Date**
- **Hardship Grants**
- **Energy Assistance Grants**
- **My Energy Discount** (Washington only)
- **Home Improvement Services**  
(Energy efficiency)
- **Energy-Saving Tips and Tools**
- **Friendly Customer Service**

To learn more, please call (800) 227-9187 or visit [myavista.com/senior](https://myavista.com/senior)

## Need help with your energy bills?

We're here for you.

Avista works with community agencies in your area to provide financial assistance for energy costs. Plus, we offer other services to help you manage your energy usage and pay your bill.

- **Comfort Level Billing** divides yearly energy costs into 12 equal and predictable monthly payments.
- **Payment Arrangements** can be made on an individual basis for those in need.
- **Preferred Due Date** helps align your bill's due date with your payday.
- **Hardship Grants** may be available to help with urgent needs. Contact your local community action agency for options.
- **Energy Assistance Grants** may be available to income-qualified customers. Contact your local community action agency to see if you qualify.
- **My Energy Discount** (Washington only) offers ongoing monthly bill discounts to income-qualified customers in Washington.
- **Home Improvement Services** to help reduce energy usage may be available to income-qualified customers. Contact your local community action agency to learn more.
- **Friendly Customer Service** to assist with energy needs when medical or emergency situations occur.
- **Energy-Saving Tips and Tools** are available on our website to help you manage your home energy usage.

To learn more, please call (800) 227-9187 or visit [myavista.com/senior](https://myavista.com/senior)



## Strategic Outreach & Education

The 2023-2024 Program Year marked the start of a new chapter for outreach and education related to bill assistance and energy conservation for Avista. This transformation was necessitated by several years of pandemic-related restrictions, two staffing transitions directly impacting LIRAP outreach, and the launch of joint program implementation that left previous strategies not only outdated but with the potential to fall short of Avista's new level of responsibility as a joint administrator. In response to these changes and factors, Avista's deployed an outreach strategy that included the elements outlined below.

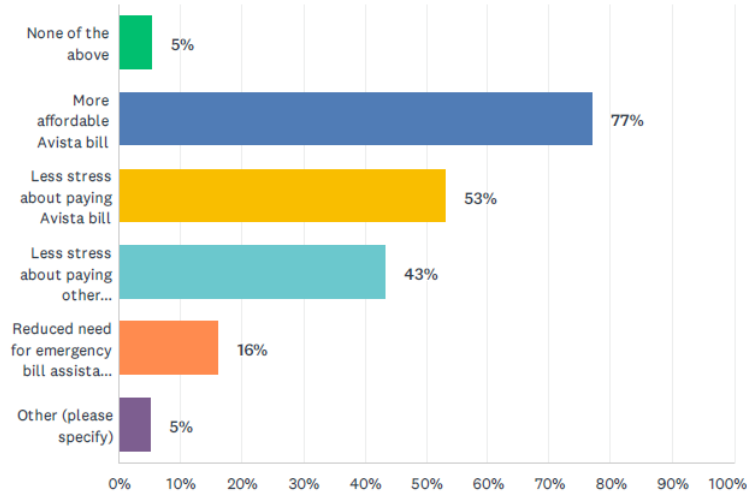
### Gathering Customer Feedback

In May 2024, Avista administered a survey to MED enrollees with the following objective: Obtain feedback from MED participants about their overall satisfaction and whether their monthly bill discount has provided financial relief with improved confidence for ability to pay their bill. The survey was promoted via email to all active participants utilizing a secure and anonymized online survey mechanism. 1,552 customers ultimately completed the survey. Of those that responded, 89% were either very satisfied or satisfied with their discount, and 92% described the enrollment process as either very easy or easy. The figure below illustrates the impact that respondents expressed the MED had on their household.

Figure No. 11 – MED Participant Survey Regarding Program Impact

Q5 In which of the following ways have you benefited from the My Energy Discount program? Please select all that apply.

Answered: 1,540 Skipped: 15



ANSWER CHOICES	RESPONSES
None of the above	5%
More affordable Avista bill	77% 1
Less stress about paying Avista bill	53%
Less stress about paying other bills/expenses	43%
Reduced need for emergency bill assistance from a community agency (or other source)	16%
Other (please specify)	5%
Total Respondents: 1,540	

Customers had the opportunity to provide comments in conjunction with all of the multiple-choice questions in the survey, and from those responses, Avista was able to assemble a list of several themes. These are outlined in Figure No 12 below.

Figure No. 12 – Customer Survey Response Themes, Positive & Constructive



- Ease of application
- Awareness came from agencies, Avista, CBOs, and miscellaneous events/venues
- Appreciative of multiple ways to apply
- Ability to purchase other things, notably groceries, medications, saving, education and transportation
- Multiple mentions of dignity, stress relief, peace of mind, and ability to live more comfortably
- Wonderful experiences with CSRs and CAP agency staff
- GRATITUDE



- Sense that general public awareness is low; that more marketing/outreach is warranted
- Grateful, but still feeling overwhelmed by expenses and rising costs
- Several mentions of rate increases
- Seniors and folks on fixed income are notably struggling
- Desire to keep discount while EA credit on account
- Desire for a higher discount, especially those at 15%-20%

Finally, customers were asked to: “Please share, in your own words, what the *My Energy Discount* program has meant for you and/or your family.” Of those that completed the survey, 428 customers responded to this question. Below are two examples of the responses received.

*“We’re a lower income family. We enrolled in the My Energy Discount program during winter, so thankfully, it is benefits were felt and appreciated immediately. With the rising cost of everything, it gave us hope that we wouldn’t have to find other ways to cut costs on basics such as heating (including water), food, clothing and our housing. It gave us peace of mind knowing that we could count on this discount for months to come. It relieved some of the stress of trying to cope with inflation in costs, while our wages have stayed the same.”*

*“Being a family on food assistance and TANF while waiting for a decision from social security. The discount program has been a complete game changer as my rent is \$450 and I only get \$702 from TANF for bills. By the time I make my car payment, phone bill and trash it seemed even with comfort level billing I wasn’t ever able to keep up with the amount Avista needed for energy. I would purposely turn heat way down and cooling way down when we needed them trying to cut costs before the discount program.”*

## Meeting Customers Where They Are

Avista recognizes that income-constrained households and communities are often living in crisis and under chronic stress. Rather than expecting these customers to take the time, effort, and resources to seek us out, we believe that we should find ways to go to them. One way that Avista materialized this belief throughout the 2023-2024 PY was attending community resource fairs throughout its service territory. These events brought together dozens of resources aimed at supporting income-constrained households, such as medical care, cell phone, food assistance, clothing, and much more. By having presence at these “one-stop-shop” resource fairs, Avista was able to reach likely eligible households with Program information, quick and easy enrollment pathways, and energy saving items such as LED lightbulbs, dawn-to-dusk nightlights, and more. An additional benefit to attending these events was the connections made with other community-based organizations, who were able to provide insight on additional outreach venues, share our Program materials with the communities they serve, and ultimately expand Avista’s outreach network. During the 2023-2024 PY, Avista attended 24 community resource fairs across six of the eleven counties it serves in Washington state.

A standout example of meeting customers where they are was when Avista outreach staff setup a booth at the Spokane Transit Plaza in downtown Spokane, which serves as the central hub for the majority of public transit trips in Spokane. Attempting to reach potentially eligible customers during their regular commute resulted in 23 unique applications for MED – one of the higher yielding outreach events for the Avista team during the Program Year.

## Partnering with Community-Based Organizations

Another outreach strategy that Avista has recently implemented is to partner with Community-Based Organizations (CBOs) to share Program information with the communities they serve. Avista focused on CBOs who serve immigrant and refugee populations, English language learners, historically marginalized communities, agencies serving the aging and/or disabled populations, and organizations serving income-constrained individuals and households. Throughout the Program Year, Avista met individually with 25 different organizations to inform them of the available bill assistance,

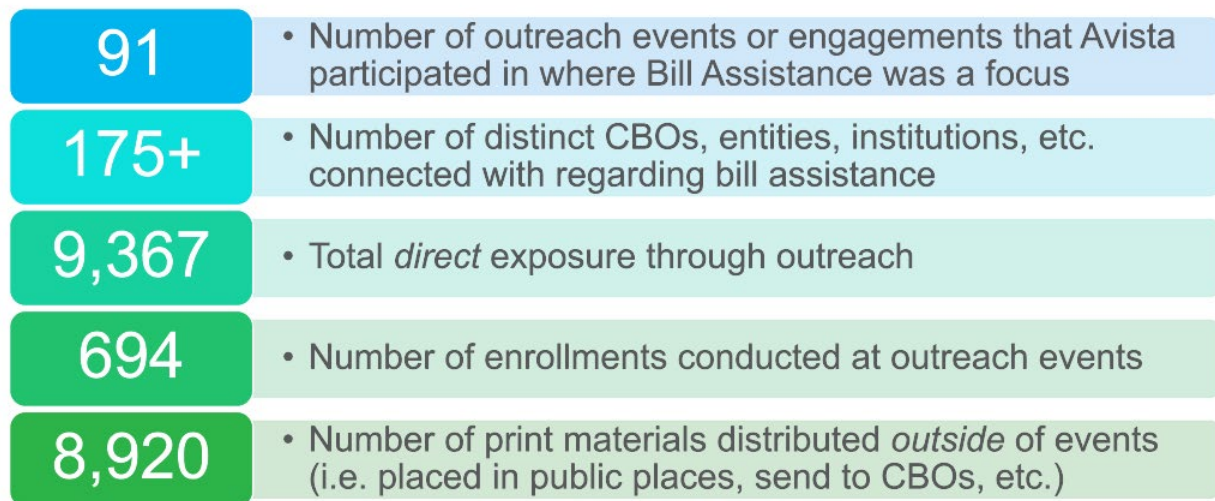
equip them with materials to share with their communities, and offer additional training and/or resources if needed.

In the fall of 2023, Avista connected with a Resource Navigator from Nuestras Raíces, a Spokane-based nonprofit organization that promotes and serves the Hispanic/Latino interest through cultural, business outreach, social justice and wellbeing programs. These bilingual Resource Navigators meet with clients, learn about their needs, and help them access assistance programs. Because self-attestation of household size and income made access to MED much easier beginning with the 2023-2024 PY, Avista saw an opportunity to train these Resource Navigators to assist their clients in completing a bill assistance application for LIRAP. This is an area that Avista will continue to engage in for future outreach, as it not only strengthens community partnerships, but also expands the impact of bill assistance.

### **Widespread Presence**

Avista is headquartered in Spokane, Washington, and a majority of its customer base in Washington resides in Spokane County – which means that there is no shortage of outreach opportunities in the greater Spokane area. Avista’s outreach strategy, however, is to have a presence in *all* the communities it serves. During the 2023-2024 Program Year, Avista attended events or met with community partners in six of the ten counties within its Washington service territory – including Spokane, Ferry, Asotin, Whitman, Stevens, and Adams – and has plans to visit all ten during the 2024-2025 PY. Figure No. 13 below provides a snapshot of Avista’s outreach efforts and the estimated impact.

Figure No. 13 – Avista Outreach Snapshot, PY 2023-2024



## Conservation Education & Outreach

Conservation Education, or Con-Ed, is a key component of LIRAP, as it supports the Program’s intent to encourage energy conservation among limited income customers. Teaching and demonstrating proven approaches to managing energy use has the potential to reduce customers’ bills, thereby increasing customers’ ability to afford and pay these bills. In LIRAP’s inception dockets (Docket Nos. UE-010436 and UG-010437), the Commission Staff’s Decision Memo dated April 25, 2001 notes:

*Staff believes that a comprehensive educational program should be designed to contribute toward changing the behavior of customers with respect to energy conservation and efficiency. The educational materials may include video, workshops, articles, brochures and newsletters, etc. The production of educational materials, including how well the message is structured, ease with which it can be comprehended by customers and whether or not there are alternative forms of educational materials to enhance conservation measures, should be evaluated by consultants.*

Also provided in Staff’s Memo was the inclusion of a 4% funding level to be allocated to Avista for Con-Ed.<sup>48</sup> Based on this Order, Avista continues to recognize the following educational strategies as efficient and effective means for delivering the energy conservation program:

<sup>48</sup> In 2015, the Company’s Conservation Education funding level was reduced to .08%.

- Energy conservation workshops for groups of Avista customers with the primary focus on reaching seniors and low-income households.
- Energy conservation kits that include items such as: window plastic, V-seal, draft stoppers, and other items to encourage effective energy management practices.
- Avista printed materials that feature information may include, and is not limited to, information regarding:
  - Avista assistance programs, such as payment arrangements, Comfort Level Billing (CLB), preferred due date, etc.
  - Energy saving methods and resources
  - Outage preparation for those with medical equipment
  - Scam avoidance
  - Electric and natural gas safety

## Agency Conservation Education & Outreach

The Agencies delivering LIRAP to Avista customers can use up to 6% of direct service funding to purchase energy saving items to disburse to households either at the time of their CAA appointment or through other means. The summaries below provide an overview of each Agency’s Con-Ed activities, as provided by each Agency, for the 2023-2024 Program Year, as well as an overview of the Company’s own activities. It should be noted that two of the partner Agencies did not report out on their Con-Ed activities.

### Community Action Center (CAC) Whitman

The Community Action Center, which serves Whitman County, conducted 2,061 Avista energy assistance appointments during the 2023-2024 Program Year, all of which included some sort of conservation education. Of these appointments, 1,145 were for LIRAP and 916 were LIHEAP and/or Hardship appointments.<sup>49</sup> The following list breaks down the LIRAP appointments by category, and may include duplicates to account for households with multiple appointments throughout the PY:

- AMP Enrollments: 5
- AFP Enrollments: 2
- LIRAP Shares Pledges: 443
- MED Appointments: 695
  - New Enrollment: 209
  - 4-year Extended Term: 312
  - Income Updates: 174

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<sup>49</sup> These sum to more than the total of 2,061 because several households received both LIRAP and LIHEAP/Hardship.



During energy assistance appointments, CAC case managers provide energy conservation consultation, including advice on how customers can save on their bill, how to make payment arrangements, and, when necessary, what they call a “tough love” chat – a discussion of why the client has not been paying their bill and the importance of doing so with the help of energy assistance. All customers receive a bag of Con-Ed materials during an energy assistance appointment, and for phone appointments (which make up about 60% of CAC’s appointments) customers are invited to come to the CAC office to pick up a bag. The Agency’s Con-Ed bags include plastic window kits, LED bulbs, a nightlight, stick on door sweep, outlet gaskets, rope caulk, Agency magnet and “Energy Assistance Information Sheet”. CAC estimates that they distributed more than 600 Con-Ed bags to customers during the 2023-24 PY through the following means: 38 bags were distributed to households who completed in-person appointments at the Pullman or Colfax Office; 28 to those that picked up Con-Ed bags from their local office throughout the year; 140 bags were distributed at fall outreach events; 237 at food bank outreaches, and; 164 were provided to households at events where CAC set up tables throughout the year.

CAC Whitman makes a significant effort to increase the awareness of available bill assistance, including conservation education, to potentially eligible households. This PY, the Agency conducted thirteen county-wide outreach activities during the fall of 2023, as well as fourteen food bank outreach activities in the summer of 2024. CAC also used other various forms for public awareness and outreach, including ads in local newspapers, flyers given to city halls & food banks, the CAC fall newsletter (8,000 were mailed out in September 2023), cold calls to client who received services the previous year, and CAC tables at local fairs/events. Because much of their appointments are over the phone, CAC sees these outreach events as critical to get in front of the community and distribute conservation education materials to them. Lindsey Brocius, Energy Assistance Coordinators, shares: *“At CAC Whitman we feel Con-Ed is an important piece of the energy assistance appointment process. Many households look forward to picking up their ‘energy goodie bag’ for the year.”*

## **Community Action Partnership (CAP)**

The CAP serves Asotin County. During the 2023-2024 Program Year, CAP provided conservation education information directly to 173 households seeking bill assistance through phone calls, in-person appointments, and weatherization referrals. They also distributed 15 conservation kits, which included items like window films, door strips, door sweeps and informational brochures. In addition to these forms of direct education, CAP estimates that they reached an additional 300 Avista customers with general energy efficiency public awareness. This was done through attendance at community resource events, flyer/brochure distribution, and the conservation education video CAP has playing for clients while they wait in the office lobby.

Because CAP only serves in one county and often has applicants drop paperwork off rather than scheduling appointments for direct contact, conservation education can present a challenge. To address these challenges, CAP intends to attend more outreach events, and also to better inform the public of the availability of conservation kits by creating a conservation flyer that will be attached to the application, in future Program Years.

## **Opportunities Industrialization Center (OIC) of Washington**

The OIC of Washington serves Grant and Adams Counties. During the 2023-2024 LIRAP Program Year, OIC's Support Service Counselors conducted intake appointments with clients to reinforce steps they could take to conserve energy within their homes. During appointments, customers were coached on how to conserve energy using basic steps such as using less hot water, washing laundry in cold water, unplugging all unused electronic devices, and setting their thermostat at or below 68 degrees. Clients were also informed of the availability of Avista's low-income weatherization program, the Avista Oregon Low-Income Energy Efficiency (AOLIEE) Program, which may help them with the installation of more permanent energy efficiency measures in their home.

OIC conducts 90% of its intakes via phone, but still has the option to conduct in-person intakes for walk-in emergency clients. As a result of transitioning from the traditional in-person intake appointments to phone-based contacts, OIC has identified an opportunity to evaluate and enhance their delivery of services while still providing

continuous service to clients. Part of this continuation of service is their ability to still distribute conservation materials to their clients, a critical piece of Avista's Con-Ed approach. OIC estimates to have distributed 2,047 Con-Ed kits containing the following materials during the 2023-2024 PY: LED lightbulbs, weather stripping, switch and outlet gaskets, and LED nightlights.

In an effort to increase general awareness of available bill assistance, including conservation education, OIC took several different approaches during 2023-2024. They placed advertisements that reached well over 7000+ clients, and also posted on their Agency social media, websites, and reader boards. OIC also setup information tables at numerous area food banks and attended community events throughout their service territory to distribute brochures and flyers, as well as sharing information with local school personnel, parenting programs, health centers, and employers to ensure that the populations they served were aware of the available assistance. Finally, OIC developed and implemented Energy and Weatherization Conservation Education Workshops which they host throughout the year.

### **Rural Resources Community Action**

Rural Resources serves Stevens, Lincoln, Pend Oreille, and Ferry Counties. In August of 2023, just prior to the start of the new Program Year, Rural Resources mailed out Energy Information Letters to approximately 2,000 Avista households who had applied for energy assistance within the past four energy seasons. A flyer was included, notifying customers they could pick up conservation items from their local Rural Resources office (Colville, Davenport, Inchelium, Lone, Newport, and Republic), the Loon Lake Food Pantry, or the Odessa Food Bank. These pre-packaged Con-Ed kits included LED bulbs, rope caulk, window plastic, surge protector, and foam insulation for outlets. As a result of these outreach efforts, Rural Resources estimates that 900 Con-Ed kits were distributed to Avista customers during the 2023-2024 Program Year.

In addition to customer outreach, the Energy Team at Rural Resources also educated Avista customers on conservation during their energy intake appointment. This education includes an overview of any energy saving items they have received, as well as simple updates they can make or behaviors they can change at home that can help

reduce their energy costs. Customers are also provided with billing and payment options to ensure they are receiving all the assistance they are eligible for. Customers with particularly high energy usage receive in-depth Con-Ed conversations to identify potential causes for the high usage, such as a leaky water tank, well pump issues, and stopping excessive air leakage. Rural Resources staff use personal examples (stories) to highlight the possible savings, including an estimate of the annual dollar amounts that can be saved and how they themselves have benefitted from the use of Con-Ed materials, to highlight the impact of energy conservation. Rural Resources also involves their Weatherization team in these cases to assess if the client might be eligible for weatherization services as yet another means of energy cost savings.

### Spokane Neighborhood Action Partners (SNAP)

SNAP serves Spokane County. During the 2023-2024 Program Year, SNAP reached thousands of income constrained Avista households through energy assistance appointments, energy conservation workshops, materials distribution, community events, and more. Table No. 19 below provides a summary of these activities, as well as corresponding estimated customer impact.

*Table No. 19 – SNAP Conservation Education Activities & Estimated Impact*

Activity	Description	Estimated Qty./Impact
<b>Con-Ed at LIRAP Appointments</b>	Includes educational materials, as well as energy saving items*	13,285
<b>Con-Ed at LIHEAP Appointments</b>	15 minutes of every LIHEAP appointment is spent going over energy conservation.	9,712
<b>Con-Ed at Energy Outreach events</b>	Includes educational materials, as well as energy saving items*	598
<b>Number of energy efficiency workshops</b>	Provided to seniors, families, co-housing communities, etc.	11
<b>Avista customers reached through EE workshops</b>		556
<b>Outreach events attended</b>	Includes school and community events, resource fairs, etc.	90
<b>Individuals reached through events</b>		4,380

<b>Print materials distributed at events</b>	Weatherization brochures, door hangers, energy assistance flyers	4,500
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*\*Energy saving items include SNAP & Avista co-branded tote bag, LED lightbulbs, LED Dusk-to-Dawn bulbs, LED battery back-up lightbulbs, LED nightlights, large window plastic, weatherstripping, outlet switches, door draft stoppers, energy saving refrigerator magnet (winter and summer), tabletop fans (summer), and printed SNAP materials.*

SNAP serves about 80% of Avista’s Washington customers, which explains their vast reach and impact in comparison to other partner Agencies. They also have a well-established presence in the community and an impressive team leading their outreach efforts. In addition to the many mediums listed above, SNAP also uses the following venues and strategies to increase the public awareness of bill assistance and energy efficiency: social media, the SNAP website, targeted neighborhood canvassing, information-sharing by community centers, schools and other local programs who service income-constrained individuals and families. Through these and other efforts, SNAP was able to *more than double* the number of individuals receiving Con-Ed materials from the previous Program Year.

# Data Collection

The data collection and measures used by Avista Utilities in the evaluation of LIRAP include:

- LIRAP Database
- Customer Service System (Avista Utilities' information management data base)
- Agency Monthly Requests for Data and Admin/Program Delivery and Con Ed Staff and Labor quarterly reports
- Ongoing Advisory Group review

This Report was a collaborative effort of Avista staff and Agency partners. Agency staff provide monthly demographic reporting in aggregate of those they have served with LIRAP. They also provide a comprehensive Admin and Con-Ed spending report quarterly.

Avista staff contributing to the Report includes representation from Regulatory Affairs, Revenue Accounting, the Contact Center, Corporate Communications, and Community & Economic Vitality.

## Participating LIRAP Agencies

Agency	Service Area
Community Action Center	Whitman County
Community Action Partnership	Asotin County
Opportunities Industrialization Center of Washington	Grant & Adams Counties
Rural Resources Community Action	Lincoln, Stevens, and Pend Oreille Ferry Counties
Spokane Neighborhood Action Partners	Spokane County
Spokane Tribe of Indians	Residents of the reservation
Washington Gorge Action Programs	Skamania and Klickitat Counties

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