

# Low-Income Rate Assistance Program (LIRAP)

## **Annual Summary Report**

For the program period October 2020 through September 2021

**WASHINGTON** 

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## **Overview**

Avista Utilities' Low-Income Rate Assistance Program (LIRAP), approved by the Washington Utilities and Transportation Commission (UTC or Commission) in 2001, collects funding through electric and natural gas tariff surcharges on Schedules 92 and 192. These funds are distributed by Community Action Agencies and Spokane Tribe of Indians (collectively, Agencies) in a manner similar to the Federally sponsored and State-administered Low-Income Home Energy Assistance Program (LIHEAP). LIRAP, like LIHEAP assistance, can help a household pay ongoing energy costs, avoid having its utilities shut off or help reestablish service after a disruption occurs.

Avista remains committed to reducing the burden of energy costs for our customers most affected by rising energy prices, including low-income individuals and families, seniors, disabled and vulnerable customers. To assist our customers in their ability to pay, the Company focuses on actions and programs in four primary areas:

- 1) advocacy for and support of programs providing direct financial assistance,
- 2) low-income and senior outreach programs,
- 3) energy efficiency and energy conservation education, and
- 4) support of community programs that improve affordability of basic costs of living for resource-constrained customers.

Additionally, the Commission's Final Order 07 in Docket Nos. UE-140188 and UG-140189 (*Consolidated*), established the following goals to guide program design:

- 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.

<sup>&</sup>lt;sup>1</sup> Final Order 07, issued June 25, 2015, Granting Joint Petition and Approving Modifications and Additions to Avista's Low Income Rate Assistance Program Compliance Filing.

In support of these goals and focus areas, the Company's LIRAP, for the 2020-2021 program year, was comprised of six components:

- **LIRAP Heat**: mimics the LIHEAP program in terms of intake requirements and benefit calculation. Effective October 1, 2020 the income eligibility for both LIHEAP and LIRAP Heat is 150% of the Federal Poverty Level (FPL).
- **LIRAP Emergency Share**: LIRAP Emergency Share emulates the Project Share community fuel fund that is funded through voluntary donations to help customers in emergency or hardship situations.
- LIRAP Senior/Disabled Energy Outreach (Senior/Disabled Outreach): targets a third distinct customer group that have incomes between 151% to 200% FPL by providing a one-time per program year benefit of \$100 for customers who have an alternative heat source, or \$400 for customers who heat with Avista. Effective October 1, 2017 customers receiving disability income were added to the eligibility criteria for this grant. This program ended on September 30, 2021.
- LIRAP Senior/Disabled Rate Discount (RDP or Rate Discount): A rate discount program for senior and disabled customers with incomes between 151-200% FPL. This program was approved for full implementation for income qualified customers and launched on October 1, 2019.
- LIRAP COVID-19 Hardship Grant (Hardship Grant): Temporary modifications to LIRAP were implemented in April 2020, to help mitigate some of the economic impacts of the COVID-19 pandemic being experienced by Avista customers. These modifications allow customers to receive an additional emergency grant, similar to LIRAP Share, up to \$350. These temporary modifications ended September 30, 2021.
- Arrearage Management Plan (AMP): Implemented in April 2021 and available to customers with incomes at 51-200% FPL, this program reduces customer arrearages owed over a 12-month period by providing an incentive for regular, on-time payment of these balances. Available twice within a 7-year period.

## **Program Year Results**

With the enactment of the rules for the Clean Energy Transformation Act (CETA) and Senate Bill 5295 (SB 5295), along with the need to provide relief for customers experiencing economic hardship due to the COVID-19 pandemic, 2020 and 2021 proved to be catalyzing years for Avista's LIRAP as well as for customer assistance programs overall. During the 2020-2021 program year, \$7,410,704 in electric revenue and \$4,002,535 of natural gas revenue was collected through Schedules 92 and 192, for a total of \$11,413,239. In total, 22,783 of Avista's Washington electric and natural gas customers received energy grants (including LIRAP, LIHEAP, and other community sources), with the average grant amount at approximately \$344. Of the 10,916 customers that received the 16,172 LIRAP grants disbursed during 2020-2021 (inclusive of Heat, Emergency Share, Senior/Disabled Outreach, and Hardship Grant), the average grant amount was \$353.

Table 1 below reflects the total budget of Avista's LIRAP, the amount collected through Schedule 92 and Schedule 192, and the actual expenditures during the 2020-2021 program year. Expenditure amounts include Direct Services (DS), Administration (Admin), and Conservation Education (ConEd).

**Table 1 – 2020-2021 LIRAP Budget and Expenditures** 

	Prog	gram Budget	ogram Year penditures	019-2020 over Funding	Unspent Funding
Electric	\$	7,071,599	\$ 5,346,384	\$ 1,047,023	\$ 2,772,238
<b>Natural Gas</b>	\$	4,059,850	\$ 2,980,627	\$ 574,494	\$ 1,653,717
Total	\$	11,131,449	\$ 8,327,011	\$ 1,621,517	\$ 4,425,955

<sup>&</sup>lt;sup>2</sup> Includes funding for both LIRAP and the Senior/Disabled Rate Discount.

The remaining unspent balance of \$4,425,955 is made available to Agencies in the 2021-2022 program year.

#### **Grant Participants and Fund Distribution**

Avista's LIRAP provided 16,172 grants in the 2020-2021 program year, with the total grant amount averaging \$353. As provided above, customer eligibility for LIRAP Heat is determined according to existing guidelines established by Federal and State standards used for LIHEAP. Customers experiencing energy emergencies and/or financial hardship are also eligible for assistance under LIRAP Emergency Share. Additionally, senior and/or disabled customers who exceed the LIRAP Heat income guidelines may qualify for the LIRAP Senior/Disabled Outreach or the Rate Discount. The LIRAP Senior/Disabled Outreach is designed, ideally, to be used in conjunction with the Company's Comfort Level Billing (CLB) payment option. Avista's CLB provides an approximate monthly average of the customer's estimated annual billings, therefore allowing the customer to pay a fixed 1/12<sup>th</sup> of their estimated annual bill each month.

Typically, participants may receive a total of two grants from LIHEAP/LIRAP Heat and LIRAP Emergency Share at different times during the program year. To address the financial hardships experienced as a result of the COVID-19 crisis, participants also became eligible to receive an additional COVID-19 Hardship Grant beginning in April 2020; this grant continued to be offered through the 2020-2021 program year. The Agencies can serve a customer with LIRAP funds more than once in a program year if the household continues to experience hardship after receiving assistance, but the emergency grant maximum of \$350 can only be exceeded for customers with extenuating circumstances. To demonstrate the program impact in meeting the need of its customers, Table 2 below shows a year-to-year comparison of the number of grants issued for each program component, with the total and average amounts for each.

Table 2 - Number and Amount of Grants by Program Component

Year 20 - October 2020 through September 2021							
Program Component	Number of Grants	<b>Grant Total</b>	Avg. Grant Amount				
LIRAP Heat	4,646	\$1,952,745	\$420				
LIRAP Emergency Share	7,337	\$2,306,538	\$314				
Senior/Disabled Outreach*	291	\$111,000	\$381				
COVID-19 Hardship Grant	3,898	1,344,191	\$345				
Total	16,172	\$5,714,474	\$353				

<sup>\*</sup>Does not include 893 Rate Discount participants

Year 19 - October 2019 through September 2020								
Program Component Number of Grants Grant Total Avg. Grant Am								
LIRAP Heat	6,756	\$2,797,846	\$414					
LIRAP Emergency Share*	11,996	\$3,528,478	\$294					
Senior/Disabled Outreach**	971	\$368,000	\$379					
Total	19,723	\$6,694,324	\$339					

<sup>\*</sup>Includes 2,752 COVID-19 Hardship Grants

With regard to income and household size, 59% of LIRAP participants during the 2020-2021 program year had household average incomes less than \$15,000, and approximately 26% of the grant recipients had annual household incomes less than \$8,000. Additionally, 62% of the LIRAP participants had households of two or more people, while customers renting their residences constituted 69% of the total.

Tables 3a and 3b below show a collection of demographic data intended to be responsive to requests for general information of participating customers. This data was collected by the participating Agencies and compiled by Avista's LIRAP Analyst. The information is sorted by traditional grants (LIRAP Heat, Emergency Share, and Senior/Disabled Outreach) and Hardship Grants, respectively.

<sup>\*\*</sup>Does not include 516 Rate Discount enrollments

Table 3a – Demographic Data - Traditional Grants: October 1, 2020 – September 30, 2021

Washington LIRAP Data Compilation - TRADITIONAL GRANTS							
	•	n September					
	# of Households	% of Households	Cumulative %				
Home Ownership							
Own	3,831	31%	31%				
Rent	8,443	69%	100%				
Total	12,274						
Heating Fuel Source							
Electric	7,874	64%	64%				
Natural Gas	4,400	36%	100%				
Other	0	0%	100%				
Total	12,274						
Size of Household							
1 Person	4,616	38%	38%				
2 People	2,475	20%	58%				
3 People	2,431	20%	78%				
4+ People	2,753	22%	100%				
Total	12,274						
Annual Income Level							
Under \$2,000	2,122	17%	17%				
\$2,000-\$3,999	419	3%	21%				
\$4,000-\$5,999	263	2%	23%				
\$6,000-\$7,999	314	3%	25%				
\$8,000-\$9,999	1,744	14%	40%				
\$10,000-\$11,999	996	8%	48%				
\$12,000-\$14,999	1,338	11%	59%				
Over \$15,000	5,079	41%	100%				
Total	12,274						

 $\begin{tabular}{ll} Table~3b-Demographic~Data-COVID-19~Hardship~Grants:~October~1,~2020-September~30,~2021 \end{tabular}$ 

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		D HARDSHIP h September	
October 1,	zozo umougi	i September	30, 2021
	# of Households	% of Households	Cumulative %
Home Ownership			
Own	1,237	32%	32%
Rent	2,661	68%	100%
Total	3,898		
Heating Fuel Source			
Electric	2,360	61%	61%
Natural Gas	1,538	39%	100%
Other	0	0%	100%
Total	3,898		
Size of Household			
1 Person	1,416	36%	36%
2 People	888	23%	59%
3 People	596	15%	74%
4+ People	998	26%	100%
Total	3,898		
Annual Income Level			
Under \$2,000	947	24%	24%
\$2,000-\$3,999	110	3%	27%
\$4,000-\$5,999	68	2%	29%
\$6,000-\$7,999	86	2%	31%
\$8,000-\$9,999	378	10%	41%
\$10,000-\$11,999	194	5%	469
\$12,000-\$14,999	314	8%	549
Over \$15,000	1,801	46%	1009
Total	3,898		

#### **Administration and Program Support Fees**

A portion of the revenue collected for LIRAP is provided to the seven Agencies in Avista's Washington service territory for the administration and delivery of the program to qualified customers. These Admin funds are essential in supporting the Agencies in their ability to implement LIRAP programs. Avista and its partner Agencies have developed and delivered crucial LIRAP programs to ensure ease of access and sufficient benefit for low-income customers struggling to afford basic costs of living and to reduce energy burden.

Avista's 2019 Low-Income Needs Assessment, as completed by Evergreen Economics and provided as an Attachment to the Company's 2019-2020 LIRAP Report, identified that customers residing on tribal reservations, along with seniors and households with children, were more likely to have a past due balance on their utility account. As a result of this assessment, Avista pursued the ability to make LIRAP available to those residing on tribal land, thus engaging the Spokane Tribe of Indians Health & Human Services LIHEAP department to become administrators of LIRAP. Prior to this partnership, those residing on the reservation who were senior and/or receiving disability income or needed emergency assistance would have had to contact Rural Resources to apply for those programs. Beginning in 2021, customers can now apply with the local LIHEAP department on the tribal reservation to receive assistance.

For this reporting program year, a total of \$1,868,119 was distributed to the Agencies for Admin purposes. This amount, including the \$419,034 carry over from the previous reporting program year, totaled \$2,287,153 available for the Agencies to use in the administration of LIRAP for 2020-2021. Excluding the amount subsidized from other funding sources, the actual amount utilized by the Agencies to support program administration was \$1,804,735, which left an unspent Admin balance of \$482,418 at September 30, 2021. Table 4 below represents a recap of the Administration and Program Support Fees spent, and the amount available at September 30, 2021.

**Table 4 – Administration and Program Support Fees** 

WASHINGTON LIRAP				
Admin and Program Support Fees				
October 1, 2020 through September 30, 2021				
Admin and Program Fees Carry Over from Program Year 18	\$419,034			
Program Year 19 - Admin & Program Support Funds paid to Agencies	1,868,119			
Net Funds Available for Admin and Program Support Funds Spent by Agencies	2,287,153			
Admin and Program Support Funds Spent by Agencies	(1,804,735)			
Unspent Admin and Program Support at September 30, 2020	\$482,418			
Percent Unspent in Comparison to Available Funds	21%			

## **Conservation Education Staff & Labor Support**

The Company budgets 4.2% of program funding 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 agency, specifically for ConEd activities. ConEd funds are paid out to the Agencies in monthly payments, along with Admin funds. For this program year, a total of \$474,574 was distributed to the Agencies for ConEd. This amount, including the \$160,478 carry over from the previous reporting program year, totaled \$635,052 available for ConEd.

The amount spent by the Agencies from LIRAP funds was \$440,967, leaving an unspent ConEd balance of \$194,085 at September 30, 2021. 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 Conservation Education Staff and Labor costs. Table 5 below represents a recap of the ConEd spent and the amount available at September 30, 2021.

**Table 5 – Conservation Education Staff and Labor** 

WASHINGTON LIRAP					
Conservation Education Staff and Labor					
October 1, 2020 through September 30, 2021					
ConEd Staff and Labor Carry Over from Program Year 18	\$160,478				
Program Year 19 – ConEd Staff and Labor paid to Agencies	474,574				
Net Funds Available for ConEd Staff and Labor	635,052				
ConEd Staff and Labor Funds Spent by Agencies	(440,967)				
Unspent Admin and Program Support at September 30, 2020	194,085				
Percent Unspent in Comparison to Available Funds	30%				

## **Program Impacts**

## **Program Distribution Percentage**

The recommended percentages for program distribution among the three grant programs (i.e., LIRAP Heat, Emergency Share and Senior/Disabled Outreach) are 60% for LIRAP Heat, 26% for LIRAP Emergency Share, and 14% for Senior/Disabled Outreach. The Direct Service funding distribution results for this program year were as follows:

**Table 6 – Direct Service Funding Distribution** 

Agency	Heat	Emergency Share	Senior/Disabled Outreach	COVID-19 Hardship
Recommended	60%	26%	14%	No Distribution
Percent for Program				Target
Distribution				
<b>Community Action</b>	72%	10%	2%	16%
<b>Partnership Asotin</b>				
OIC of Washington	45%	16%	1%	38%
Rural Resources	57%	28%	3%	12%
SNAP	30%	29%	2%	39%
WGAP	100%	0%	0%	0%
<b>Community Action</b>	3%	62%	8%	28%
Center Whitman				
Spokane Tribe	15%	45%	0%	40%
Total	36%	27%	2%	35%

Avista recognizes that each agency's service territory is unique and attributes the differences in program distribution to the diversity of need that each agency experiences.

#### **Avista Electric and Natural Gas Assistance**

To improve the equitability of the distribution of LIRAP funds and based on discussions with Commission Staff and other interested parties, the Company agreed to allow electric revenue to be used for natural gas heat customers if those same customers also use Avista electric service.

Of the total LIRAP assistance grants issued, approximately 64% were utilized as electric and 36% were natural gas. The 2020-2021 results for assistance by heating source are as follows:

**Table 7 – Percentage of LIRAP Grants Issued by Fuel Type** 

Agency	Electric	Gas
Community Action Partnership Asotin	43%	57%
OIC	96%	4%
Rural Resources	82%	18%
SNAP	60%	40%
Spokane Tribe	100%	0%
Community Action Center Whitman	72%	28%
Washington Gorge	0%	100%
Total	64%	36%

#### Energy Burden, as provided by SNAP

Per RCW 19.405.020, "Energy burden" means the share of annual household income used to pay annual home energy bills. This term is relevant to low-income issues as a comparison to income used for other essential needs such as food, housing, clothing, and health services. Table 8 below, which includes information provided by the Spokane Neighborhood Action Partners (SNAP), depicts reductions in the energy burden experienced by Spokane County bill assistance participants in the 2020-2021 program year. The column titled "Before Benefits" represents the energy burden of low-income customers prior to receiving bill assistance benefits, and each successive column illustrates the percentage by which the low-income customers' energy burden was reduced after receiving the specified bill assistance benefit.<sup>3</sup>

Table 8 has been calculated as follows:

• The household energy burden was calculated by dividing the annual household income by the annual energy costs.

<sup>&</sup>lt;sup>3</sup> Each new energy burden reduction is reflective of only the one specified benefit being applied, not a cumulative effect of all prior benefits listed in the chart.

- Annual income was calculated by multiplying the three-month average required at the time of application, by four to determine the approximate annual income.
- Annual energy costs were determined by the actual previous 12 months energy usage from the date of application.

Table 8 - Energy Burden, as provided by SNAP<sup>4</sup>

Energy Burden 2020/2021 <sup>5</sup>							
% of FPL	Number of Customers	Before Benefits	Energy Assistance	COVID Hardship	Senior/ Disabled	Project Share	Total % Change
0-50% FPL	900 Electric <u>435 Gas</u> 1,335 Total	45% 64%	18.28% 6.43%	19.05% 7.60%	0% 0%	11.06% 1.43%	18.65% 6.18%
51-100% FPL	2,172 Electric <u>884 Gas</u> 3,056 Total	17% 8%	9.07% 3.46%	10.12% 4.62%	0% 0%	4.24% 3.20%	9.10% 2.67%
101-150% FPL	951 Electric <u>554 Gas</u> 1,505 Total	7% 4%	5.69% 2.22%	5.33% 2.65%	0% 0%	2.54% 2.26%	5.22% 1.85%
151 to 200% FPL	275 Electric 233 Gas 508 Total	1% 1%	4.63% 1.65%	1% 0%	0% 0%	1.33% 1.86%	3.0% 1.87%

<sup>• 5,896</sup> unique households served in reported date range; includes all clients served (not just Avista customers)

In summary, according to the data provided by SNAP for the 2020-2021 program year, the energy burden for customers <u>after</u> receipt of bill assistance benefits, was approximately 26% for electric customers and 58% for natural gas customers between 0 and 50% FPL 39%; 8% for electric and 5% for natural gas for those between 51 to 100% FPL; 2% for electric and 2% for natural gas for those between 101 and 150% FPL; and by -2% for electric and -1% for natural gas bill assistance recipients with incomes at 151% to 200% FPL.

During the reported program year there were so few Senior/Disabled Outreach grants that the averages did not have a statistically significant impact on their burden rates.

<sup>&</sup>lt;sup>4</sup> This table has been modified from previous LIRAP Reports in that rather than reporting the resulting energy burden of each customer group after receipt of the specified benefit, it now shows the <u>amount by which</u> the energy burden was reduced.

<sup>&</sup>lt;sup>5</sup> Table 8 – Energy Burden information provided by SNAP features their experience in Spokane County.

## **Program Administration**

#### **LIRAP Senior and Disabled Rate Discount**

Avista's Senior/Disabled Rate Discount has been in place since October 1, 2019. Through the RDP, senior and/or disabled households with incomes between 151% to 200% of FPL are eligible to receive a Rate Discount on either their electric or natural gas service. The per kilowatt-hour and per therm discounts were designed to provide an average benefit of \$400 per participant per program year, consistent with the grant amount provided through the existing LIRAP Senior/Disabled Outreach. The current RDP rate is \$0.03064 per kilowatt-hour of electricity and \$0.48469 per therm of natural gas.

RDP Enrollments comprised 64% of total senior/disabled assistance during the 2020-2021 program year, while Senior/Disabled Outreach assistance decreased by approximately 70% from the previous program year. This decrease was primarily driven by the anticipated sunset of the Senior/Disabled Outreach program, which was fully replaced by the RDP on September 30, 2021.

To provide ease in access to the RDP, a referral process was put in place to connect Rate Discount candidates identified by Avista Customer Service Representatives (CSRs) directly to the Agencies to initiate the application process. The Rate Discount referral process includes a screening procedure through which CSRs determine a customer's potential eligibility for the RDP at the time the customer contacts the Company and expresses financial difficulty in paying their bill. If the customer is a senior (over the age of 60) and/or receives disability income and is within the income qualification range, the CSR informs the customer that he/she may qualify for the Rate Discount and if they are interested, their information will be shared with the local CAA

<sup>&</sup>lt;sup>6</sup> The actual benefit amount received by each customer may be more or less than \$400 depending on actual usage.

organization so that a representative from the CAA can contact them to complete the application and enrollment process. The CSR then initiates a letter notifying the customer that they may qualify for the Rate Discount; the letter includes contact information for the local CAA as well as instructions for how to prepare for the call from the agency representative. Twice a week, a listing of RDP candidates (as identified by Avista CSRs) is forwarded to the respective agency; the listing includes the candidates' contact information needed for the agency to initiate contact.

In March 2021, a team of Avista employees and agency representatives from Rural Resources and SNAP met to improve the business process for RDP referrals, with the primary goal of this work being to improve the overall effectiveness of the referrals. At the time, only 16% of customers referred to the Agencies were enrolled in the RDP. To increase participation and efficacy, the process was streamlined for both the CSRs and the Agencies. This, combined with additional communication and training regarding the program, resulted in an increase of referral effectiveness to 22% as of September 30, 2021. The Company and its partner Agencies aspire to have referrals prove effective at least 48% of the time. This metric of referral success continues to be monitored quarterly and monthly.

The Direct Service expenditures for the RDP totaled \$313,146 for the 2020-2021 program year. Table 9 below compares the distribution of Senior/Disabled Outreach grants and Rate Discount enrollments for this timeframe:

**Table 9 – 2020-2021 Senior/Disabled Outreach & Rate Discount Distribution** 

Senior/Disabled Outreach and Rate Discount 2020/2021 Program Year							
	Participants Total Grant/Discount Average Grant/Discou						
		Amount	Amount				
Grant	291	\$111,000	\$381				
<b>Rate Discount</b>	893	\$313,146	\$351				
Total	1,184	\$424,146	\$358				

As noted previously, the Senior/Disabled Outreach program concluded on September 30, 2021, and has been replaced fully by the Senior/Disabled Rate Discount. To provide ease in the transfer from the grant-based offering to the Rate Discount, 243 of the 291 Senior/Disabled Outreach grant recipients were automatically enrolled in the Rate Discount in September 2021, and will remained enrolled until the next program year (October 1, 2022) or until they request to be removed from the RDP. The Agencies will follow up with these customers in the spring of 2022 to complete their certification and extend their enrollment period to two years.

#### **LIRAP COVID-19 Hardship Grant & Referrals**

To provide support and assistance to customers who had been adversely affected by the pandemic financially, the Company requested, and received subsequent approval, to implement a temporary COVID-19 Hardship Grant in April 2020.<sup>7</sup> The one-time grant is intended to provide assistance to customers who express financial hardship due to the Coronavirus public health and economic crisis, consistent with the following criteria:

- No income guideline requirement.
- Customer vocalized COVID-19 related hardship.
- Maximum grant amount of \$350. However, each agency has the discretion to award an additional emergency grant for a total combined maximum grant allowance of \$700.
- Benefit covers only the amount owing on the customer's account (what is needed to bring the account current), up to the \$350 maximum, but should not result in credit on the account. However, at its discretion, the agency may contact Avista's Customer Assistance Referral Evaluation Services (CARES) department to obtain customer account history

<sup>&</sup>lt;sup>7</sup> See Docket Nos. UE-200307 and UG-200308. Avista obtained approval of its proposed COVID-19 Hardship Grant from its EAAG ON March 26, 2020, filed for approval on April 2, 2020 and received approval from the Commission on April 10, 2020, to become effective on April 13, 2020.

information and, based on the information provided, may decide to award a Hardship Grant that *does* result in a credit if they determine that the circumstances warrant such an overage.

In partnership with the Agencies, Avista established a COVID-19 Hardship Referral Process that included warm transfers to the Agencies for customers who had called the Company and expressed financial hardship due to the pandemic. The Company obtained phone line information from each agency, inclusive of the times that the phone line is staffed and whether the line was able to accept messages. The referral process also included a daily referral report that listed the customers that were transferred, to assure that customers were not lost through the transfer process. The Hardship Grant ended on September 30, 2021, but the Hardship Referral process remains in place as a way to connect customers experiencing hardship to assistance programs that may be available.

#### **LIRAP AMP Implementation**

The Arrearage Management Program, launched in April 2021, provides relief for residential customers with incomes between 51-200% FPL who have an unmanageable past-due balance (arrears) on their account. Through the AMP, customers in this income range will receive a benefit that covers 90% of the customer's arrears as an incentive for regular, on-time payments from the time of enrollment. Upon enrollment, the 10% of the arrears the customer is responsible for will be amortized over a 12-month period. For each on-time, in-full payment the customer makes on their portion of the arrears and their current bill, 1/12th of their arrears will be forgiven. The intent of this offering is that the incentive will influence desired payment behavior of regular, on-time payments, while also reducing the burden a past due balance places on customers. The AMP will be offered to customers in instances where energy and emergency assistance have already been utilized yet the customer still needs assistance with their unpaid arrears. Likely due

to the additional energy assistance resources made available to customers in response to the COVID-19 pandemic, such as increased LIHEAP funding or the COVID-19 Debt Relief Program described later in this Report, the AMP was not utilized by any Agencies during the 2020-2021 program year.

#### **True-Up Mechanism**

Per the Commission's Order 07 in Docket Nos. UE-140188 and UG-140189, Avista developed an annual true-up mechanism for LIRAP Schedules 92 and 192 to ensure recovery of the annual budget each year. The true-up mechanism established an annual filing by the Company, to adjust rates and collect the necessary program revenue, thereby aligning the dollars collected with the annual budgeted amounts communicated to the Agencies. Further, Order No. 05 in Docket Nos. UE-150204 and UG-150205 (Consolidated) established a five-year plan and true-up schedule which required Avista to file revisions to Schedules 92 and 192 by August 15th of each year, to increase LIRAP funding by 7% or two-times the amount of any residential base rate increase, with annual funding increases beginning effective October 1, 2016, to continue through October 1, 2019. Order 09 in Docket Nos. UE-190334 et. al. then extended the five-year funding plan through Avista's next general rate case (GRC), and Final Order No. 08/05 in Docket Nos. UE-200900 et.al. further extended this funding mechanism. In compliance with these aforementioned orders, Avista filed its annual 7% rate increase, and its true-up of the estimated revenues collected for LIRAP to the actual collections for the prior October to September LIRAP program year, on July 30, 2021, with a substitute filing made on September 13, 2021 to correct an inadvertent calculation error.<sup>8</sup> For the 2020-2021 program year, LIRAP collections from customers were higher than the targeted budget by \$17,146 (\$75,523 over-collected for electric and \$58,377 under-collected for natural

<sup>&</sup>lt;sup>8</sup> See Docket Nos. UE-210588 and UG-210589.

gas). These figures were included in the Company's annual filing and were thereby taken into account with the rates approved by the Commission for the upcoming program year (effective October 1, 2021).

#### **Avista Energy Assistance Advisory Group**

Also established as part of Order 07, Dockets UE-140188 and UG-140189 (Consolidated), Avista's Energy Assistance Advisory Group (EAAG or Advisory Group) includes representation from the Agencies that administer LIRAP, The Energy Project, Commission Staff, Aging and Long-Term Care of Eastern Washington, the Public Counsel Unit of the Attorney General's Office (Public Counsel), Northwest Energy Coalition (NWEC), the Department of Commerce, and Avista staff. The purpose of the Advisory Group 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. The EAAG surpassed its typical cadence of meeting at least twice per year during the 2020-2021 program year, meeting a total of nine times during the reporting period. The additional meetings topics discussed during these meeting included, but were not limited to: incorporation of various CETA obligations into Avista's LIRAP, 9 strategies for the provision of debt relief funding for COVID-19 arrears, <sup>10</sup> various commitments resulting from general rate cases, and collaboration regarding the SB 5295 requirement to present a rate discount for all income-eligible customers.

The following chart provides a listing of the EAAG meetings and the agenda topics during the 2020-2021 program year:

<sup>&</sup>lt;sup>9</sup> See Docket Nos. UE-210490 and UG-210491 for Avista's request to incorporate CETA's new definition of "low-income", which provides that income qualification for low-income programs should be available for customers with incomes up to the greater of 200% FPL or 80% Area Median Income (AMI).

<sup>&</sup>lt;sup>10</sup> See Docket Nos. UE-210114 and UG-210115 regarding Avista's COVID-19 Debt Relief Program.

<b>Meeting Date</b>	2020-2021 Program Year Agenda Topics		
11/10/2020	<ul> <li>(1) Clean Energy Transformation Act (CETA)</li> <li>(2) COVID-19 Terms: Additional Funding for Customer Programs</li> <li>(3) LIRAP 2020 Program Year Overview</li> <li>(4) Looking Forward to 2021</li> </ul>		
01/12/2021	<ul><li>(1) COVID-19 Terms: Additional Funding for Customer Programs</li><li>(2) Clean Energy Transformation Act (CETA)</li></ul>		
03/9/2021	<ol> <li>(1) Disconnection Reduction Plan</li> <li>(2) Discuss Avista Notices</li> <li>(3) Update for the COVID-19 Debt Relief</li> <li>(4) Community Partner Networks</li> <li>(5) Arrearage Management Program Update</li> <li>(6) Outreach &amp; Marketing</li> <li>(7) New LIRAP Partners Update</li> <li>(8) CETA Equity Update</li> </ol>		
05/11/2021	<ul><li>(1) LIRAP and Advisory Group Review</li><li>(2) LIRAP Updates</li><li>(3) CETA: Income Eligibility</li><li>(4) Avista LIRAP Administration Costs</li></ul>		
05/21/2021	Special Meeting to Discuss UTC requirement (1) Requirement Review (2) Area Median Income Chart (3) Programs Overview		
06/14/2021	Special Meeting of Increased Income Eligibility Threshold (1) LIRAP Goals (2) Energy Burden Review (3) Program Recommendation		
06/21/2021	Special Meeting of Increased Income Eligibility Threshold (1) Recent Legislation (2) Path Forward (3) Program Recommendation		
07/13/2021	<ul> <li>(1) Debt Relief Update</li> <li>(2) LIRAP Update</li> <li>(3) Review Senate Bill 5295</li> <li>(4) Moving Forward: Subcommittee</li> </ul>		
09/14/2021	<ul><li>(1) Avista Programs &amp; Activities: Energy Smart Loan and Draft Clean Energy Implementation Plan</li><li>(2) LIRAP Update</li></ul>		

During the May and June meetings, the EAAG collectively agreed a tariff revision for the inclusion of an Energy Grant, as a sub-program of LIRAP, would be filed to meet the CETA requirement of having a program in place for all customers that meet the new "low-income"

definition described above. The Energy Grant was approved for implementation October 1, 2021 and provides a flat \$250 benefit for customers with verified incomes at 151% FPL to the greater of 200% FPL or 80% Area Median Income. Also included in this filing was a request to temporarily suspend the anticipated October 1, 2021 launch of the LIRAP Percentage of Income Payment Plan (PIPP) and Past Due Payoff (PDP) offerings, which had already been approved effective April 1, 2021 in Dockets UE-210077 and UG-210078. With the incorporation of the new Energy Grant, and the recent passage of SB 5295, Avista and its EAAG decided it would be best to pause the implementation of any new LIRAP offerings that may ultimately end up duplicative or misaligned with the intent of SB 5295.

Instead, at its June 21 Advisory Group meeting, the Company established a subcommittee made up of interested parties from its EAAG (Subcommittee), tasked to review the current LIRAP suite of programs for compliance with CETA and SB 5295 and propose any potential modifications to LIRAP that may be warranted as a result. The Subcommittee, comprised of representatives from UTC staff, agency representatives, Public Counsel, The Energy Project and Avista staff, began meeting in mid-July and continued to meet on a bi-weekly basis through November 2021. To provide a common foundation of knowledge among Subcommittee members, informational sessions were conducted by Company staff and agency representatives to provide the background of LIRAP in addition to explanations of the fundamental rules and operations for bill assistance programs at the Agencies and the utility. Once these informational sessions were completed, and a baseline of understanding set amongst Subcommittee members, the Company presented a proposal for an income-based bill discount model, to be made available to all eligible low-income customers, to the Subcommittee for consideration and design collaboration. In considering the specifications for the future LIRAP Bill Discount (Bill Discount), Avista commissioned an independent third-party, Empower Dataworks, to provide analyses regarding

customer energy burden, general program design criteria, and self-certification models—including the potential impacts, both programmatic and financially, of all presented program components. Among other things, this work helped the Company to pinpoint potential discounts amounts per income tier that would appropriately help participants achieve an energy burden of six or less percent, using data that was specific to Avista customers. The Subcommittee's resulting Bill Discount proposal was presented to the greater Advisory Group on October 26, 2021, with the results of those subsequent discussions with the EAAG helping to shape the LIRAP revisions that will be proposed in the Company's 2022 GRC.

#### **Agency Meetings**

Under usual circumstances, the Company hosts meetings with the Agencies twice a yearfirst in the spring to review the activity of the heating season and to identify areas of strength or
opportunity, then again in the fall, just before the heating season commences to share plans for
appointments and outreach. For the 2020-2021 program year, the COVID-19 pandemic, along with
rapid and frequent program changes, presented a need to increase the frequency of connection
between Avista and the Agencies to ensure that both parties were working in tandem to serve
customers optimally during these unique and uncertain times. Monthly LIRAP check-in meetings
were set up to provide regular updates and opportunities to discuss the variety of activities that
were occurring. As such, the Agencies and Avista staff met nearly every month during this
program year to share awareness of the program changes and ensure that all implementation details
were worked through collaboratively.

#### **COVID-19 Debt Relief Assistance & Outreach**

Many funds beyond LIRAP were expanded or developed anew in response to the financial impacts of the COVID-19 pandemic. These include CARES Act funds, expanded LIHEAP

allowances, American Rescue Plan Act funds, and the Department of Treasury's Rental Assistance Program (that includes provisions for utilities). Another such funding option made available to Avista customers during the 2020-2021 program year to help address the unprecedented economic strain brought on by the pandemic was the Company's COVID-19 Debt Relief Program (Debt Relief).<sup>11</sup>

In partnership with the EAAG, and in compliance with the Commission directives set forth in Order No. 01 in Docket No. U-200281, Avista developed an additional program for low-income customers early in 2021 that was designed specifically to provide financial relief to customers experiencing pandemic-related hardship. COVID-19 Debt Relief began in April 2021, with a budget totaling \$6,517,040, <sup>12</sup> and provided assistance via two separate grant types: an Automatic Grant and a Forgiveness Grant. For the Automatic Grant, residential customers with past due balances who had received income-qualifying assistance within the past 24 months received a grant that was automatically applied to their Avista account, paying off their total past due balance up to a maximum of \$2,500. As a second element to the Debt Relief offering, residential customers at or below 200% FPL, but without a history of receiving income-qualifying assistance, were encouraged to contact their local Agencies or Community Partner Network, or CPN (as described later in this Report) to apply for a Forgiveness Grant. Forgiveness Grants provided eligible customers with up to \$2,500 to pay their past due balance via a one-time grant. These grant amounts were intended to cover the full past-due balance accumulated on the customer's account, minus any customer payments, and should not result in a credit on the account. However, as an exception, the administering entity had discretion to place an additional benefit, not to exceed

<sup>&</sup>lt;sup>11</sup> See Docket Nos. UE-210114 and UG-210115.

<sup>&</sup>lt;sup>12</sup> Per Order No. 01 in Docket No. U-200281, the funds for the Company's COVID-19 Debt Relief program (equal to 1% of Avista's 2019 revenues) were to be deferred, with Avista seeking later recovery of all associated program costs not otherwise included in rates in accordance with Commission Order No.01 in Docket Nos. UE-200407 and UG-200208.

\$100, intended to stabilize the household and allowed to result in a credit on the customer's account. The grant totals for COVID-19 Debt Relief are broken down as follows:

#### Funding

\$6,517,040 available \$6,356,340 spent on grants \$160,700 allocated for Agencies' Admin

#### **Grant Type**

Automatic Grants: 7,786 issued

\$4,838,266 spent

Forgiveness Grants: 1,607 issued

\$1,518,074 spent

To support expedience and ease in access to benefits for customers to alleviate their pandemic-related arrears, the Company employed new approaches for the distribution of Debt Relief funds. Such tactics included the instant financial relief provided by the Company's administration of Automatic Grants, as well as the creation of a Community Partner Network intended to expand the reach of the program. Two rounds of Automatic Grants were conducted throughout the course of the Debt Relief program's existence, intended to provide immediate assistance to the customer segment known to struggle with the affordability of their bills, even prior to the pandemic. The first set of grants were awarded to those customers that had received income-qualified energy assistance programs in the past two years, and the second for those with balances who had received emergency assistance within that same timeframe. <sup>13</sup> In total, Automatic Grants comprised 74% of the total spend for Debt Relief grants.

**Table 10 – Automatic Grant Distribution** 

<b>Automatic Grants</b>	<b>Total Dollars</b>	<b>Customer Count</b>	Average Benefit
April 2021	\$2,884,948	4,872	\$592
June 2021	\$1,953,317	2,914	\$670
Total	\$4,838,266	7,786	\$621

In an effort to engage hard-to-reach and underserved customers, the option to establish a CPN was made available to the Agencies within Avista's service territory as part of COVID-19

<sup>&</sup>lt;sup>13</sup> Emergency assistance does not require income qualification but is an indicator of customer need or hardship.

Debt Relief. 14 CPN organizations, which include representation from entities that serve marginalized communities such as rural, immigrant, tribal, or people of color, are recognized as trusted sources for help and support among their communities. The Company looked to the Agencies to establish partnerships with such organizations that provide aid to underserved populations, in order to develop these networks through which they could engage their clients for the Debt Relief program. SNAP, serving Spokane County, engaged with approximately ten organizations to make the Debt Relief program available to their clients. Those organizations included Latinos in Spokane, Jesus is the Answer, the Emmanuel Family Life Center, Pacific Islander Community Association of WA, and the Hispanic Business Professional Association for outreach in Black, Indigenous, and People of Color (BIPOC) communities. For seniors and homebound customers, Aging & Long-Term Care of Eastern Washington was also engaged. Additionally, to reach those residing in one of the most impoverished neighborhoods in Spokane County, Our Place Community Outreach helped connect those neighborhoods to Debt Relief. And finally, for rural communities on the Spokane borders, the Green House and New Hope Resource Centers were brought on board to administer the program for their clients.

Demographic data was collected from Debt Relief participants and reported by the Agencies and CPNs, as shown in Table 11 below.

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<sup>&</sup>lt;sup>14</sup> Approved as part of Avista's COVID-19 Debt Relief, the CPN was approved as a permanent component of LIRAP in Docket Nos. UE-210490 and UG-210491.

**Table 11 – COVID-19 Debt Relief, Forgiveness Grant Demographics** 

	gton Covid [		
Forgivenes	s Grant Data	Compilation	-
April 1, 2020	0 through Au	gust 31, 202	:1
II O	# of Households	% of Households	Cumulative %
Home Ownership Own	415	260/	260
Rent	-	26% 74%	26%
	1,192	/4%	100%
Total	1,607		
Heating Fuel Source	1.000	(20/	620
Electric Natural Gas	1,009	63%	63%
	586	36%	99%
Other	11	1%	100%
Total	1,607		
Size of Household			
1 Person	527	33%	33%
2 People	356	22%	55%
3 People	294	18%	73%
4+ People	430	27%	100%
Total	1,607		
Annual Income Level			
Under \$2,000	965	60%	60%
\$2,000-\$3,999	455	28%	88%
\$4,000-\$5,999	49	3%	91%
\$6,000-\$7,999	8	0%	92%
\$8,000-\$9,999	13	1%	93%
\$10,000-\$11,999	12	1%	93%
\$12,000-\$14,999	17	1%	94%
Over \$15,000	89	6%	100%
Total	1,607		
Ethnicity*			
Hispanic or Latinx	160	10%	10%
Not Hispanic or Latinx	1,447	90%	100%
Total	1,607		
Race*	, , , , ,		
American Indian/Alaskan Native	2	0.12%	0.12%
Asian	18	1%	19
Black/African American	21	1%	3%
Native Hawaiian/Pacific Islander	49	3%	69
White	1,386	86%	92%
Multi-Race	8	0.47%	92%
Other	124	8%	100%
Total	1,607	0 /0	1007
Total Education*	1,007		
D-8	40	20/	20.
	48	3% 15%	3%
9-12 Non-Graduate	242		189
High School Grad/GED	642	40%	58%
12+ Some Post-Secondary	415	26%	849
2 or 4 Year College Graduate	259	16%	100%
Total	1,607		
Disabled*			
Yes	347	22%	22%
No	1,260	78%	100%
Total	1,607		
Military Veteran*			
Yes	73	5%	5%
No	1,534	95%	100%
Total	1,607		
Senior (over 60)*			
Yes	221	14%	149
No	1,386	86%	100%
Total	1,607		

To raise awareness of the availability of financial relief for customers economically affected by the pandemic, the Company executed a robust promotional campaign that sought to connect with customers – specifically those who had a past due balance – through a variety of mediums including digit, print, and social media advertisements along with emails to customers and flyers to Agencies and community organizations. Outreach also included a proactive call campaign conducted by a specialized group of CSRs who attempted to reach approximately 6,903 customers whose accounts were more than 90 days past due. In instances where the customer could not be contacted by phone, voicemails were left, emails were sent, and, in some instances, Avista staff visited customers at their home to ensure awareness of the various payment options and assistance programs available. Supporting these efforts, and for broader reach, was a marketing campaign the Company called *Power of Compassion*, that included print, digital and social media advertisements. The image below provides a sample of the marketing message that was included in all *Power of Compassion* pieces. Marketing and outreach was also conducted in Spanish in areas known to have an increased need for such translation services (e.g. Grant and Adams counties). In addition to the marketing mediums noted previously, this message was also available in door hanger format.



## **Conservation Education and Outreach**

Aligns your bill's due date with your payday to help your budgeting during the month.

Preferred due date

Conservation Education, or ConEd, is a key component of the LIRAP bill assistance program, as it supports the program's intent to encourage self-sufficiency 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 pay. 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 ConEd. 15 Based on this Order, Avista recognizes the following educational strategies as efficient and effective means for delivering the energy conservation program:

- Energy conservation workshops for groups of Avista customers with the primary focus on reaching seniors and low-income.
- Energy conservation kits that include items such as: window plastic, V-seal, outlet draft stoppers, and other items to encourage effective energy management practices. All Avista customers who have received a bill assistance grant are provided with energy conservation materials.
- Avista printed materials that feature information that may include, but is not limited to, information regarding:
  - Avista assistance programs, such as payment arrangements, CLB, preferred due date, and
  - Energy saving methods and resources
  - Outage preparation for those with medical equipment
  - Scam avoidance
  - Electric and natural gas Safety

<sup>&</sup>lt;sup>15</sup> In 2015, the Company's Conservation Education funding level was reduced to .08%.

#### **Agency Conservation Education Activities**

The Agencies can use up to 6% of Direct Service funding to purchase energy saving items to disburse to individuals either at the time of their appointment or through other means.

#### **Community Action Center (CAC) Whitman**

As a result of various COVID-19 safety precautions, the Community Action Center that serves Whitman County conducted 90% of their conservation education activities over the phone during the 2020-2021 program year. The phone consult included advice on how to save on energy costs, along with instruction about how to make payment arrangements. Clients who went to the agency or the county food bank were also provided with ConEd kits. During this program year, 1,458 Avista customers received conservation education from CAC through its LIRAP and LIHEAP conservation education efforts. It is estimated around 40 individuals obtained the ConEd kits from the CAC office, and 120 were distributed at the food bank. The CAC also mailed flyers and brochures throughout the county through other Agencies, city halls, libraries, food banks, and churches. These public information formats include the CAC Energy Assistance Brochure, Energy Saving Tips Talk Sheet, and Avista Energy Guides. Additionally, their Agency Fall Newsletter provided information about bill assistance appointment availability, outreach locations, and tips for saving energy. <sup>16</sup>

#### **Rural Resources**

Rural Resources – serving Stevens, Lincoln, Pend Oreille and Ferry counties – notified Avista customers in their annual application mailing that individuals could pick up a home energy kit from their local Rural Resources office (Colville, Republic, Ione, Davenport and Newport), or the Loon Lake Food Pantry. Approximately 700 of these kits were distributed to Avista customers,

<sup>&</sup>lt;sup>16</sup> CAC sends their Agency Fall Newsletter out annually, to all customers that have received services through CAC previously (approximately 2,000 newsletters are distributed each year).

which included LED bulbs, rope caulk, door sweeps, kitchen aerator, weather-stripping, window plastic, surge protector, and foam for outlets and gaskets. While Rural Resources is unable to estimate the total number of Avista households assisted during the 2020-2021 program year, as many Avista customers declare alternative heat sources (other than electric or natural gas) as their primary heat source and are therefore not eligible to be helped by LIRAP, the agency reported that approximately 1,436 Avista LIRAP recipients received conservation education during their intake appointments. As part of these intake interviews, Rural Resources' staff solicit feedback from their clients regarding whether they used their previous conservation items or other means of conservation within the last year; this input from clients is then used to make any warranted modifications to future kit contents. Additionally, customers with high energy usage receive indepth ConEd conversations to identify potential causes for the high usage; in these cases, the Rural Resources Energy Department works with its Weatherization staff to obtain weatherization services for the customer whenever possible. Rural Resources staff has reported that it is often challenging to convince customers of the savings that can be achieved by taking time to use the free ConEd items, and they strive to use personal examples (stories) to highlight the possible savings, including an estimate of the annual dollars amount that can be saved, to express the benefits of the ConEd kit's contents. Rural Resources also noticed a reduction in the distribution of the kits for the 2020-2021 program year, attributing the under-utilization of the kits primarily to COVID-19, in that that some individuals may be electing to only leave their home when absolutely necessary.

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

The OIC of Washington case managers reinforce energy conservation during all customer intake appointments, which were conducted primarily over the phone for 2020-2021. As an additional means of access to ConEd, OIC clients were provided with specific dates during which

they could pick up an energy kit at a local food bank. OIC also conducted outreach by setting up tables at local food banks, community events, connecting with school personnel and parenting programs, health centers, and local employers. Additionally, OIC had announcements featured in both newspaper and radio broadcasts, which were estimated to reach over 8,000 clients. Through these efforts, the agency estimates that 3,500 Avista customers were provided with energy saving items, such as caulking tape, LEDs bulbs, weather-strips, and switch and outlet gasket covers.

#### **SNAP**

Serving Spokane County, SNAP's Conservation Education Specialist dropped off home energy kits to partner organizations, such as World Relief, food pantries, the American Indian Community Center, Cheney Outreach, affordable housing, senior housing, farmer's markets, Backpack for Kids events and a blitz conducted at various convenience and grocery markets to give out kits to shoppers. The agency reports that approximately 3,166 individuals were contacted through these outreach activities. Along with general energy saving items – LED bulbs, window plastic kits, weather-stripping outlet switches, showerhead kits – individuals were provided with a night light and magnet, as well as printed SNAP materials. During each SNAP energy assistance appointment, approximately 15 minutes is spent reviewing the customer's energy usage and providing conservation education; 9,726 appointments were conducted for LIRAP clients during the 2020-2021 program year. These clients were given the option to stop by a SNAP office and pick up conservation items, and 300 individuals took advantage of this offering.

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

The Community Action Partnership serving Asotin County suspended conservation education activities during this program year due to the pandemic and anticipates hiring a staff person dedicated to this program for the upcoming 2021-2022 program year.

#### **Avista Outreach and Education**

Avista has a variety of methods for outreach and marketing to promote the availability of assistance programs and provide energy conservation education and resources.

To safeguard customer and community safety, the company suspended its annual Energy Fairs and instead endeavored to connect with customers through several different avenues. First, kits were mailed to the 1,365 customers who had attended the Energy Assistance Day that was conducted in partnership with SNAP at the Spokane County Fair and Expo Center in 2019. Since the event could not be conducted in-person for 2020 and 2021, it was important to connect with these customers to provide them with information about the upcoming heating season along with conservation items and information for the cold weather months. Additionally, a Business Reply Card (BRC) was sent to all customers with past due balances. To receive a free home energy kit, the customer simply had to return the prepaid BRC and the free kit would then be sent to the customer's home. They could also request a free Home Energy Guide and/or Energy Kids Booklet. A sample of the BRC is included below. Of the 10,000 BRCs mailed, approximately 2,753 customers returned the BRC and received a kit. Avista Outreach staff also dropped off kits at food banks and other community-oriented organizations, such as the regional health district, early childhood learning centers and an affordable living complex, throughout the Company's service area; it is estimated that approximately 4,983 customers received the conservation education materials and information through these partnerships.





### **Energy Assistance Outreach**

During the cold weather month of February, the Company included an insert promoting the availability of assistance through the Agencies, along with information billing and payment options. These inserts reached approximately 183,000 customers.



Additionally, in the Fall of 2020, the Company partnered with OIC to conduct a virtual Energy Assistance Day. Emails and promotional advertisements were distributed to market the availability of phone appointments for bill assistance; 65 customers participated in the day's event and received a home energy kit by mail.

Since the onset of the pandemic in 2020, Avista has included bill assistance messaging in its monthly Connections newsletter that is included with mailed bills. Below is an example of that messaging.

## Do you need help paying your bill?

We understand that there may be instances when customers find themselves facing financial difficulties. Avista partners with community agencies to provide financial assistance, plus we offer other services to help you manage and pay your bill such as Comfort Level Billing,

Preferred Due Date, and Payment Arrangements.

We're here to help. Please call us at (800) 227-9187 to discuss your options with a Customer Service Representative or for more information visit myavista.com/assistance.

We have options.

Avista's website also includes a page dedicated to assistance resources where individuals can learn about the options available, in addition to a tool that allows customers to locate their local CAA.

#### **Senior Directories and Publications**

The Company continues its practice of placing ads in senior publications as part of a strategic effort to reach seniors with information about energy efficiency, billing assistance, Senior Energy Outreach workshops and CARES information. As part of our outreach program for seniors we also provided home energy kits in the fall to home bound seniors through Meals on Wheels in Spokane and Stevens counties.

## **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);
- Ongoing Advisory Group review.

## **Participating LIRAP Agencies**

Agency	Service Area	
Community Action Partnership	Asotin County	
Community Action Center	Whitman County	
Opportunities Industrialization Center of	Grant & Adams Counties	
Washington		
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	

## **Utility Program Contacts**

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