



Low-Income Energy Assistance 2025 Legislative Report

Report required pursuant to RCW 19.405.120

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Report to the Legislature

Director Joe Nguyễn

Acknowledgments

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Executive summary

Background

[RCW 19.405.120](#) requires Washington electric utilities make energy assistance¹ programs and funding available to low-income households. Electric utilities must demonstrate progress in providing assistance pursuant to assessments and plans conducted under the law. To the extent practicable, priority must be given to low-income households with a higher energy burden.

This report is the second report to the Legislature under Sec. 120, [the first being the Low-Income Energy Assistance 2023 Legislative Report](#),² and follows Commerce's [Statewide Monthly Low-Income Energy Assistance Program Design](#) per legislative request.³ The Department of Commerce's Low-Income Energy Assistance 2023 Legislative Report found low-income households across Washington have significant energy assistance need,⁴ and far too often do not have access to programs and funding crucial to maintaining affordable home energy bills.

This work aligns with the goals of the Clean Energy Transformation Act (CETA) ([Chapter 288, Laws of 2019](#)), which provides safeguards to maintain affordable rates and reliable service. It also requires an equitable distribution of the benefits from the transition to clean energy for all utility customers and adds and expands energy assistance programs for low-income customers.

Section 120 of CETA is interpreted to mean that all utilities should provide accessible energy assistance programs for all eligible customers in Washington. Based on our analysis, including content from written plans from utilities and public meetings, this is not occurring. To bring the state into alignment with Sect. 120 of CETA, this report analyzed the patchwork of utility programs and suggests policy alternatives to ensure equitable access to utility support for every eligible household in Washington.

Legislative mandate

Sec. 120 requires Commerce to submit a biennial report to the Legislature that:

- (i) Aggregates information into a statewide summary of energy assistance programs, energy burden, and energy assistance need
- (ii) Identifies and quantifies current expenditures on low-income energy assistance; and

¹ Energy assistance: Assistance to reduce household energy burden, such as bill assistance, energy efficiency, weatherization, or distributed energy resource programs, such as solar plus storage.

² [The Low-Income Energy Assistance 2023 Legislative Report](#) was informed by four public workshops and comment periods and over a dozen technical advisory group meetings with utilities and low-income advocates, whose primary roles were to ensure the integrity of the data in the report.

³ The Statewide Monthly Low-Income Energy Assistance Program Design report was informed by nearly a dozen local listening sessions and workshops with low-income households and community organizations across the state, and nine public workshops and eight public comment periods to co-create program design principles, refine the recommended program design, and explore alternatives with utilities, low-income advocates, and the public.

⁴ Energy assistance need: The amount of funding needed to reduce home energy bills of a low-income household to 6% of its gross income. Energy burden and assistance need do not include transportation costs.

(iii) Evaluates the effectiveness of additional optimal mechanisms for energy assistance including, but not limited to, customer rates, a low-income specific discount, system benefits charges, and public and private funds.

The law also requires Commerce assess mechanisms to prioritize energy assistance toward low-income households with a higher energy burden. This is the second report to satisfy these requirements.⁵

Key findings

This report provides required assessment of the work of 55 disparate utilities in Washington to provide low-income energy assistance per utility reporting requirements and compares that information to the agency interpretation that the law requires access for all people in Washington.

Energy burden and assistance need are fundamentally basic household affordability issues. Monthly energy bill assistance is a crucial tool to ensuring low-income households can afford to turn on the lights, heat and cool their living spaces, power medical devices, charge cellphones, and cook food. An inability to afford home power can lead to harmful curtailment, disconnections, housing instability, rationing of food and medicine, and negative physical and mental health effects. Forward-looking plans from utilities indicate many low-income households statewide will not have access to crucial assistance programs to sustainably mitigate these harms. Per statute, Commerce evaluates the tradeoffs of additional mechanisms of assistance in this report; however, it does not make recommendations.

- To date, most utility energy assistance programs are not open to all low-income households and do not provide comparable benefits to similarly situated households. While utilities are making incremental changes, there is sparse evidence to support significant transformations of programs and household outcomes across consumer-owned utilities. Customer participation rates in assistant programs in investor-owned utilities remain below 40% – and for some investor-owned utilities below 15% – as of Sept. 30, 2024. Electric utility energy assistance programs in 2023 served roughly 1 in 5 (20%) of low-income households eligible for energy assistance under state law ([RCW 19.405.020](#)) and administrative rule ([WAC 190-40-030](#)), despite significantly higher levels of energy assistance need statewide.
- No county in Washington has a utility program participation rate above 50% of eligible households under state law ([RCW 19.405.020](#)) and administrative rule ([WAC 190-40-030](#)) in 2023.
- Utility programs serve a significantly smaller share of low-income households compared to individual statewide programs with similar eligibility criteria, such as the Supplemental Nutrition Assistance Program.
- Current trends and utility plans anticipate low-income households statewide will not have access to crucial monthly bill assistance programs with uniform benefit levels for similarly situated households.

Alternatives to the utility-by-utility approach

Low-income monthly energy bill assistance targeted to addressing energy assistance need should not be restricted by time or place in Washington.

The most complete way to address the patchwork of energy assistance programs would be to create a statewide low-income energy assistance program. That was discussed at length in the [Low-Income Energy Assistance 2023 Legislative Report](#), and is highlighted in this report. Within the existing model of utility-based

⁵ [Low-Income Energy Assistance 2023 Legislative Report \(wa.gov\)](#)

programs, equitable results could be improved by offering monthly energy bill assistance programs that are open to all low-income households.

It is important that any future approach to monthly low-income energy assistance allows all low-income households to access monthly bill assistance, provides uniform benefit levels for similarly situated households, targets energy assistance need, considers the human experience of accessing assistance programs, and does not restrict access to assistance by time or place.

Overview of current programs

There are 55 unique energy utilities in Washington, and they all manage their own programs for bill assistance. Of these, nearly all low-income energy bill assistance programs fail to align with state law ([RCW 19.405.020](#)) and administrative rule ([WAC 194-40-030](#)). Most programs funded through utility operations have additional non-income eligibility criteria, such as disability or age, that deny many low-income households access to monthly bill assistance. Many of the programs rely on donations, which are insufficient to meet energy assistance need.

There are two types of electric utilities in Washington:

- **Investor-owned utilities** (IOUs) serve about 44% of residential electric utility customers. They include Avista Corp, PacifiCorp and Puget Sound Energy (PSE). The Utilities and Transportation Commission (UTC or Commission) regulates investor-owned utilities within the state and has broad jurisdiction over its utilities as the economic regulator. The Commission's jurisdiction and authority are enumerated under RCW Title 80.
- **Consumer-owned utilities** (COUs) serve about 56% of residential electric utility customers. COUs include roughly 24 public utility districts, 17 municipal utilities and 17 cooperatives providing electricity to retail customers. They have their own locally elected governing boards and are primarily self-regulated under their respective statutory frameworks.

Households with similar incomes and resources receive very different assistance levels depending on which utility serves them. This pattern is little changed from results in [Commerce's 2023 Legislative Report](#) and a more recent survey of utility webpages in March 2024 included in Commerce's [Statewide Monthly Low-Income Energy Bill Assistance Report](#).

Layered over the patchwork of utility programs to provide low-income energy burden assistance is the Low-Income Housing Energy Assistance Program (LIHEAP), a federal block grant program, and a few relatively small state programs that offer limited assistance to low-income households.⁶ These programs are designed to meet crisis needs of low-income households.

Utility assistance programs

In 2023:

- Electric utilities spent \$100 million on low-income energy assistance programs.
- The programs yielded \$68 million in bill reductions for an estimated 170,659 households.
- Donations collected by electric utilities amounted to another \$2.8 million in bill reductions.

⁶ In 2024 Commerce implemented a one-time allocation by the Legislature of Climate Commitment Account funds. Commerce provided \$200 payments to help low-income and moderate-income households with the clean energy transition. These funds were distributed as credits on customers' utility bills. However, purpose of the credits was not to address household energy burden but instead to costs of the clean energy transition, notably transportation energy costs. The program had income eligibility criteria that included households that are not low-income, and assistance was for a one-time flat \$200, which is not sufficient to address the energy assistance needs of most energy burdened low-income households nor is it targeted to households in greatest need.

Utilities that supply only natural gas to households also have energy assistance programs. These programs are estimated to have delivered about \$1.7 million in energy assistance. LIHEAP and state programs collectively amounted to around \$91 million in assistance for electric and natural gas households in 2023.

Most energy programs are direct bill assistance programs, and their bill reductions are conservatively assumed to be reflected in the household responses of the American Community Survey. Therefore, the analysis of the Department of Energy's Low-Income Energy Affordability Data (LEAD) Tool⁷ yields an annual energy assistance need of \$275 million to reduce low-income home energy bills to 6% of household income statewide.⁸ If most of the bill assistance was not reflected in the DOE LEAD Tool, energy assistance need would be smaller but still significant: greater than \$150 million statewide.

Energy burden reductions and **program participation rates** are the principal metrics to evaluate the success of low-income energy assistance programs. They are the outcomes of programmatic inputs, such as program availability, accessibility, visibility, rigorous evaluations, clear and consistent communications, and funding.

Low participation rates compared to comparable statewide programs

While there are differences across geography and communities served, electric utilities share low program participation rates despite the significant energy burden of low-income customers. Electric utility energy assistance programs served no more than 1 in 5 (20%) low-income households eligible for energy assistance under state law and administrative rule, despite high levels of energy assistance need statewide.

Commerce took a duplicate count⁹ of utility program participants by county and compared it to the number of low-income household units at 80% of the area median income minus the number of subsidized rental housing units in each county.¹⁰

The duplicate count of utility program participants likely overestimates the number of households enrolled in utility programs. Of all Washington counties:

- 32 out of 39 (87%) have enrollment rates below 25%
- 21 of 39 counties (61%) have participation rates below 15%
- No county has over 50% of low-income households enrolled in utility energy assistance programs

The agency compared the performance of utility programs to individual statewide programs with similar eligibility criteria, such as the Supplemental Nutrition Assistance Program (SNAP). The data shows that in 2023, there were three households served by SNAP for every household enrolled in a utility energy assistance program, despite SNAP having more restrictive income eligibility than what is laid out in state law and administrative rule for utility low-income energy assistance programs. These calculations likely overestimate

⁷ The DOE LEAD Tool is based on American Community Survey responses from households about their home energy costs, including their last month's electric utility bill. Household energy costs are then extrapolated over the course of a year. DOE calibrates the energy cost data using electric utility and natural gas utility survey data submitted by utilities to U.S. Energy Information Administration. This fixes averages across geographic areas to match roughly utility reported data. For example, electricity expenditures by households across Census tracts in a utility service area would be roughly equal to the average utility revenue by customer

⁸ Commerce calculations using U.S. Department of Energy Low-income Energy Assistance Data [WA DOE LEAD Tool Data](#)

⁹ A duplicate count means an individual household enrolled in more than one assistance program, such as a donation program and bill discount program, are counted multiple times.

¹⁰ Subsidized rental housing units often consider home energy costs when determining housing subsidies. Households receiving housing subsidies may still be energy burdened.

the number of households enrolled in utility programs, because households enrolled in more than one utility program are counted multiple times unless Commerce could easily identify potential duplicate counts.

The SNAP data is unduplicated, meaning even if three people living in one household were individually enrolled in SNAP, they would be counted as one household. Commerce subtracted the number of subsidized rental housing units in each county from the unduplicated SNAP count to adjust for households that would be eligible for SNAP, but who may have their energy burden already accounted for through subsidized housing programs.

The ratio of SNAP participants to utility program participants varies significantly across counties. [Appendix D](#) shows the percentage of utility program participants compared to SNAP participants by county. These numbers overestimate the number of households enrolled in utility programs, because households enrolled in more than one utility program are counted multiple times. Commerce subtracted the number of subsidized rental housing units in each county from the unduplicated SNAP count to adjust for households that would be eligible for SNAP, but who may have their energy burden already accounted for through subsidized housing programs. Statewide, there are more than half a million additional households being served by SNAP than by utility energy assistance programs.

Table A: Utility program expenditures and participation

	2023	2020
Households served	170,659	166,911
Utility spending on programs	\$100 million	\$95 million
Total bill reductions	\$68 million	\$69 million

Commerce continues to be a resource to support utilities in identifying national best practices in social service program designs to help address program accessibility and energy assistance needs of their customers. This includes:

- Hosting workshops for utilities and low-income advocates to share knowledge about implementation successes and challenges across the state, and develop best practices in bill assistance program design principles that could be adapted for their own programs
- Providing biennial summaries of utility program successes, challenges, and plans to facilitate utilities learning from one another
- Compiling and sharing national best practices in social service program designs
- Sharing the thoughts of low-income households across the state about what they say would be helpful for energy assistance program designs
- Exploring possibilities of sharing SNAP household level data with utilities per their request

Additionally, the agency compiles and convenes biennial workshops to review energy burden and energy assistance need data for utilities to improve utility efforts to serve low-income households with energy assistance.

Commerce remains dedicated to helping utilities and advocates work together to identify gaps and improve energy assistance program outcomes for households.

Income eligibility

The Clean Energy Transformation Act ([RCW 19.405.020](#)) and administrative rule ([WAC 190-40-030](#)) define a household as low-income if its income does not exceed the higher of 80% of area median income (AMI) or 200% of the federal poverty level (FPL), adjusted for household size. In Seattle, a household of four makes \$110,950 at 80% AMI;¹¹ in Spokane, it's \$78,300.¹²

The three investor-owned utilities – Puget Sound Energy, Avista Corp., and PacifiCorp – offer energy bill assistance programs open to all low-income households as defined in state law. As their regulator, the UTC required them to apply the state definition of low-income to their programs.

Nearly all of the low-income energy bill assistance programs offered by consumer-owned utilities use more restrictive eligibility standards than the definition of low-income in statute ([RCW 19.405.020](#)) and administrative rule ([WAC 194-40-030](#)). As an example, the income standard used by Seattle City Light is 70% of state median income (SMI). This is a higher income level than the 200% FPL standard, but it is significantly less than 80% of AMI as defined in state law and administrative rule. This has resulted in findings by the State Auditor for several utilities.

¹¹ [Seattle Housing Authority](#)

¹² [City of Spokane Area Median Income](#)

The human impact

Powering home heating and cooling, lighting, and appliances is an everyday necessity and key component of the cost of living. As defined in WAC 194-40-030, a household is burdened when its energy bills exceed 6% of its gross income. This calculation reflects that shelter costs should not exceed 30% of income and utility costs should not exceed 20% of those shelter costs. Therefore, an affordable energy burden should be at or below 6% of household income ($30\% \times 20\% = 6\%$). This formula stresses the interconnection between housing and home energy costs in determining housing affordability and cost of living.

According to data collected by the U.S. Census Bureau's American Community Survey (2018-2022), and calibrated by the U.S. Department of Energy and National Renewable Energy Laboratory, more than 270,000 low-income households in Washington (25% of low-income households) are energy burdened.

Energy burdened low-income households spend, on average, \$1,016 more than 6% of their household income on home energy bills annually. The cumulative annual statewide energy burden of low-income households is \$275 million.

Most energy-burdened households in Washington are in urban counties, but rural counties have a higher percentage of households that are energy-burdened:

- There are 178,388 energy burdened low-income households in urban counties, with a total energy burden of \$180 million. This represents 1 in 6 (about 17%) low-income households in urban counties.
- There are 92,528 energy burdened households in rural counties with a total energy burden of \$95 million. This represents almost 2 in 5 (38%) low-income rural households.

[Appendix D](#) provides this information for each county.

Based on this research, Ferry County has the highest percent of energy-burdened low-income households (81%).

The rural utility dilemma

Making each utility responsible for meeting the energy assistance need in its service territory poses funding challenges for Washington's small and rural utilities, particularly those with a disproportionate share of low-income households. Fully addressing the low-income energy burden through utility rates for these rural utilities could result in other households becoming energy burdened.

The effect of energy burden and energy insecurity on low-income households

Energy is an essential need, and residential energy bills disproportionately affect home affordability and household budgets of low-income households. Commerce and the National Consumer Law Center (NCLC)

recently reviewed national, regional, and state studies and surveys of the impacts on energy burden and energy insecurity¹³ on low-income households.¹⁴ Findings include:

Energy burdened¹⁵ households are more likely to forgo necessities due to their home energy bill

- Energy burdened low-income households are more likely to forgo necessities, such as food and medicine, to pay their energy bills.
- Forgoing necessities to keep the lights on and the refrigerator running show that uninterrupted access to electricity service is prioritized by low-income households, even above other goods and services.
- Utility service affordability challenges force low-income households to face the "heat or eat" dilemma, which presents serious threats to public health, as low-income households are forced into food insecurity, forgo medical services and medicines, and maintain unhealthy indoor temperatures.

Energy burden increases the likelihood of households receiving disconnection notices and experiencing an involuntary loss of service and inability to operate indoor heating or cooling equipment

- Disconnection notices often create acute stress, particularly for low-income seniors, single parents, and people with disabilities.
- Involuntary loss of essential utility service is inconvenient and disruptive to everyday activities, and it can result in avoidable, devastating tragedies such as house fires from improvised heating methods and sometimes deadly inability to use medical equipment, such as respirators.
- Loss of electricity service and refrigeration can result in loss of perishable food that can worsen pre-existing financial challenges (the cost of food replacement) and food insecurity challenges.

Energy burdened households are more likely to be in arrears

- There is a clear relationship between household income, excess energy burden, and utility past due balances.
- Low-income, energy burdened households have been shown to be more likely to carry utility arrears, and also to carry higher average past due balances than their higher-income, non-energy burdened counterparts.
- Excessive energy burdens lead to borrowing through credit cards, payday loans, and other financial products that push low-income households further into poverty.
- Past-due utility bills are one of the most frequent sources of collections items in consumer credit reports. For years, utilities were one of the most common reasons consumers used payday loans.¹⁶

Energy burden negatively impacts physical and mental health

- High energy burdens can have mental health impacts, such as chronic stress, anxiety and depression, which are associated with the fear and uncertainty around access to energy, the complexities of navigating energy assistance programs, and the inability to control energy costs.

Climate change and extreme weather will exacerbate the above identified problems.¹⁷

¹³ Energy insecurity is defined by the U.S. Department of Energy's Energy Information Administration Residential Energy Consumption Survey as the likelihood a household will be unable to meet its home energy needs. It can be measured using a number of metrics, such as: frequency of forgoing or reducing basic needs like food or medicine to pay home energy bills; frequency of keeping home at an unhealthy temperature due to home energy bills; frequency of receiving a disconnection notice. ([Commerce's 2024 Low Income Energy Assistance Program Design Report](#))

¹⁴ [Commerce's 2024 Low Income Energy Assistance Program Design Report](#)

¹⁵ Energy burdened: When a household's residential energy bills exceed 6% of its gross income.

¹⁶ [Commerce's 2024 Low Income Energy Assistance Program Design Report](#)

¹⁷ Ibid.

Alternatives

Sec. 120 instructs Commerce to evaluate the effectiveness of additional mechanisms for energy assistance. These mechanisms follow two different approaches to energy assistance:

- The **utility-by-utility approach** retains electric utilities as administrators of energy assistance programs and focuses on reforming programs.
- The **statewide approach** would have a statewide entity administer energy assistance. Each program has many variations.

This report updates the discussion of additional mechanisms in the [Low-Income Energy Assistance 2023 Report](#) with the recommended statewide program design discussed in the [Statewide Monthly Low-Income Energy Assistance Report](#). In-depth discussions of additional mechanisms under a utility-by-utility approach can be found in the [Low-Income Energy Assistance 2023 Legislative Report](#) and [Statewide Monthly Low-Income Energy Assistance Program Design report](#).

Utility-by-utility approach summary

Under the utility-by-utility approach, without changes in Sect. 120 under CETA, there will likely only be incremental adjustments for people who need assistance now. Additional mechanisms under this approach aim to reinforce Washington's patchwork of energy assistance programs through either layering additional policies on top of the existing patchwork of utility programs or providing supplementary funding to utilities.

The alternative mechanisms under this approach aim to provide additional information to address and resolve individual problems by adding more policy layers or functionality to the state's patchwork of programs or push more funding through programs. In practice, the reasons why utility programs have low program participation rates are more nuanced, complex, and sometimes structural than these options suggest.

Tracking the many potential barriers to program access and harmonizing programs across more than 50 utilities will require a significant increase in state oversight and requirements.

The alternative, a statewide approach, would provide equitable support to every low-income household in Washington.

Statewide monthly energy bill assistance program summary

The other approach, the statewide approach, would have a statewide entity administer energy assistance.

The Legislature, in Sec. 129(34) of [Chapter 475, Laws 2023](#), directed Commerce to recommend a design of a statewide low-income energy assistance program to provide universal access to home energy assistance and meet energy assistance need.¹⁸ The Legislature asked Commerce for this recommendation because of the high level of energy assistance need, low participation rates in utility programs, and fragmentation of programs and communications across Washington's electric utilities.

- The recommended program design was **developed with input from more than 300 low-income households and nearly 100 community organizations from across Washington**. The design incorporates principles

¹⁸ Universal access means all low-income household can access the program.

created with input from nine workshops with utilities and statewide advocacy organizations, local knowledge of administrators of statewide social service programs and national best practices.

- The recommended program design provides **efficient, equitable, and quality monthly low-income bill assistance programs to low-income households statewide**. It begins with the recognition that people should not have to work hard to identify and access assistance, and that Washington's residents are diverse people that deserve a system that supports equal access to resources.
- The recommended program design **provides universal access to low-income monthly bill assistance with uniform benefits targeted to address energy assistance need for similarly situated households**.
- The program would have **one name and brand to be universally recognizable** to low-income households and the community organizations that serve them.
- It would **maintain income eligibility criteria under existing law and administrative rule**, which accounts for differences in cost of living across the state.
- The program would offer a **monthly income-tiered bill discount with benefit amounts targeted to address energy assistance need**. It provides a graduated benefit level that decreases as household income rises. There would be no sudden drops in benefits (benefit cliffs) or arbitrary income thresholds.
- Consistent communication about program eligibility, and enrollment across utility service territories would facilitate sharing about the program by word of mouth and direct referrals. There would be **no wrong door** for accessing assistance – households can enroll online, over the phone, or in person at any community organization offering assistance to low-income households.

The program builds on existing relationships and forges new ones with households and community-based organizations through consistent, co-created communications and community outreach plans that respect the unique needs of households and communities. The program would support education about the benefits of conservation and help connect households to other social services and energy programs.

The program would partner with organizations that serve underrepresented communities and administrators of other energy services, such as the Low-Income Home Energy Assistance Program and energy efficiency and weatherization programs.

- The recommended program design **embeds ongoing program evaluations with metrics** to track equitable access, effective delivery, and compassionate integrity of the program.

The design intentionally **reduces the inefficiencies of administering more than 50 separate monthly bill assistance programs** across Washington's electric utilities; rationalizes and simplifies the accumulated layers of policy and process; and brings in new technology and user-friendly, human-centered design to provide increased awareness and accessibility to monthly bill assistance for low-income households.

Variations on a statewide approach

Voluntary opt-out for utilities

An alternative design would be to allow utilities to opt out of a statewide low-income energy assistance program. An opt-out provision could reduce the costs of a statewide program by reducing the number of households covered by it. **Any discussion of an opt-out provision should consider the impact on that utility's low-income households**. An opt-out provision could leave households with an energy assistance program that is less visible, less accessible, and less effective in meeting energy assistance need. It could even result in those households receiving no monthly energy bill assistance at all. An opt-out mechanism would not ensure universal access, uniform benefits, or human-centered, user-friendly program options for low-income households.

Conditional opt-out for utilities

The Legislature could adopt a statewide program for low-income households served by small- and medium-sized utilities, and provide large utilities the option to administer their own programs. It would address the funding dilemmas faced by small utilities and provide better access to low-income monthly energy assistance programs for households served by all utilities. A conditional opt-out would allow utilities that offer equivalent bill assistance programs and do not suffer from potential funding constraints to retain their programs. This approach would do better at ensuring universal access, uniform benefits, and human-centered, user-friendly program options for low-income households in rural parts of the state, but fragmentation and broken communications may remain without a singular program available to all low-income households.

Large utilities would need to meet other criteria to ensure consistent services to households. These requirements include:

- Meeting existing statutory income eligibility requirements
- Providing an income tiered bill discount
- Tying benefits in each tier to an approximation of benefits required to meet energy assistance need
- Ensuring benefit level under each tier complies with a standard methodology established by rule
- Completing a biennial low-income energy assistance needs assessment
- Offering streamlined eligibility, including categorical eligibility and self-attestation
- Conducting significant outreach and submitting annual reports with results of outreach efforts
- Coordinating programs with community-based organizations, including those specifically serving historically marginalized communities
- Conducting reasonable and good faith efforts to attain approval for program design, outreach, and enrollment campaign plans from low-income advisory groups, according to guidelines established by Commerce for consumer-owned utilities or UTC for investor-owned utilities
- Reporting program participation rates along with information currently submitted under Sec. 120 on a biennial basis
- Matching or exceeding program participation rates of SNAP; if not, the Legislature could require underperforming utility bill assistance programs be phased out and the low-income households served by those utilities would be covered by the statewide monthly low-income energy assistance program

This alternative statewide approach would likely fragment services between large utilities, and medium and small utilities; however, it would reduce the patchwork of utility programs significantly.

Funding mechanisms

The Legislature requested Commerce review funding mechanisms in its evaluation of additional mechanisms of assistance. These funding mechanisms were summarized in the [Low-Income Energy Assistance 2023 Legislative Report](#). Table B summarizes potential funding sources. A mix of these funding sources may be used to fund programs and balance tradeoffs across the different funding sources.

Table B: Summary of potential funding sources

Potential funding source	Benefits	Drawbacks	Other
Ratepayers	Each utility pays for the energy burden of its customers	Utilities with a disproportionate share of low-income customers may not be able to operate	

Potential funding source	Benefits	Drawbacks	Other
	Does not impact the state budget	<p>effective programs without significant rate hikes</p> <p>Difficult if not impossible to address energy burden from multiple fuel sources if they are delivered from different utilities</p> <p>Potential rate impacts to households that do not participate in the program</p>	
Climate Commitment Account	<p>Avoids utility rate base</p> <p>Potential supplement for other funding sources</p> <p>Fewer competing priorities compared to the state general fund</p>	<p>Requires legislative appropriation</p> <p>Fluctuations in cap-and-invest revenues</p> <p>Risk of funding not being consistently allocated</p> <p>CCA revenues are designed to decline over time</p>	
State General Fund	<p>Avoids utility rate base</p> <p>Potential supplement for other funding sources</p>	<p>Competition for scarce tax dollars</p> <p>Requires legislative appropriation</p> <p>Cyclical economic dynamics</p> <p>Risk of funding not being consistently allocated</p>	
System benefits charge¹⁹	<p>Dedicated funding that avoids legislative appropriation</p> <p>Spreads costs across high and low-income areas of the state</p>	<p>Hard to include non-utility energy, such as firewood and propane</p> <p>Dedicated account could be subject to legislative change in purpose</p> <p>Potential rate impacts to households that do not participate in the program</p>	<p>Everyone contributes to low-income energy assistance</p> <p>Potential net transfer from some utilities to other utilities</p> <p>Uncertain if households served by utilities providing the most energy assistance today would spend more on energy assistance or less if subject to a system benefits charge</p>

¹⁹ A systems benefit charge is a statewide uniform charge, such as a percentage of revenue or an amount per unit of energy, assessed on energy services to fund energy assistance programs.

Conclusion

As written, Sec. 120 envisioned utilities offering multiple programs and providing funding that was open to all low-income households. However, the law did not anticipate the many barriers low-income households could encounter accessing programs, including the limited number of places they can access programs and lack of monthly bill assistance for households. It did not anticipate a variety of benefit levels for similarly situated households, and did not consider the human experience of accessing social service programs. In addition, it overlooked the challenges faced in Washington's rural utilities, where a disproportionate share of households need assistance, and the program design needs of low-income households. Perhaps most importantly, it did not foresee the difficulties fragmented program delivery poses for households and most community organizations.²⁰ These challenges are exacerbated by utilities that limit access to bill assistance programs by adopting income eligibility criteria beyond state law and administrative rule or require additional non-income eligibility criteria, such as age and disability status. Commerce has and remains dedicated to convening utilities and low-income advocates and sharing program design best practices and the thoughts of low-income households on what program designs would best serve them. Commerce will continue to collect and aggregate energy burden and energy assistance need data and continue to explore alternative ways to increase program participation rates in utility programs.

Sec. 120 increased transparency into programmatic gaps and shortfalls of utility programs and highlighted alternative mechanisms for assistance that may better meet the needs of low-income households. However, the law will not likely drive significant changes across utilities and will leave low-income households without access to low-income monthly bill assistance with uniform benefit levels for similarly situated households. If the law is successful, rural utilities with a disproportionate share of low-income households will likely experience rate hikes, which may push more households into energy assistance need. At the same time, these households are experiencing significant energy assistance need and energy insecurity.

There are significant constraints on the existing utility-by-utility approach that limit the capacity to scale programs to serve eligible households, and ensure timely, human-centered service delivery and uniform benefit levels for similarly situated low-income households across 55 utilities.²¹

This report includes a summary of different options developed both through the [Statewide Monthly Low-Income Energy Assistance Program Design report](#) along with program variations. Each approach can be evaluated on its merits of effectiveness, cost, and durability. Ultimately, it is important that any future approach to monthly low-income energy assistance allows low-income households access to monthly bill assistance, provides uniform benefit levels for similarly situated households, targets energy assistance need, considers the human experience of accessing assistance programs, and does not restrict access to assistance by time or place.

²⁰ [Commerce's 2024 Low Income Energy Assistance Program Design report](#)

²¹ [Ibid.](#)

Appendix A: Definitions

Energy burdened: When a household's residential energy bills exceed 6% of its gross income.

Energy assistance: Assistance to reduce household energy burden, such as bill assistance, energy efficiency, weatherization, or distributed energy resource programs, such as solar plus storage.

Energy assistance need: The amount of funding needed to reduce home energy bills of a low-income household to 6% of its gross income. Energy burden and assistance need do not include transportation costs.

Energy insecurity: The likelihood a household will be unable to meet its home energy needs. It can be measured using a number of metrics, such as:

- Frequency of forgoing or reducing basic needs like food or medicine to pay home energy bills
- Frequency of keeping home at an unhealthy temperature due to home energy bills
- Frequency of receiving a disconnection notice

Low-income: Household incomes that do not exceed the higher of 80% of area median income (AMI) or 200% of the federal poverty level (FPL), adjusted for household size.

Appendix B: Summary of Washington’s principal low-income energy bill assistance laws

RCW	The law says:	The law does not:
<p>74.38.070 (1979, 1980, 1988, 1990, 1998, 2002)</p>	<p>Public utility districts and municipalities may provide assistance to low-income seniors and other low-income households on a non-discriminatory basis</p>	<p>Make programs and funding available and accessible for low-income households</p> <p>Limit utility programs to seniors or customers with disabilities</p>
<p>19.405.120 (2019)</p>	<p>Addresses the full energy burden of low-income households and puts the obligation of addressing energy assistance need directly on electric utilities</p> <p>Electric utilities must make energy assistance programs and funding available to households</p> <p>Electric utilities must submit data and assessments of their programs to Commerce on a biennial basis</p> <p>Commerce submits a summary report to Legislature on a biennial basis</p>	<p>Ensure every low-income household has access to monthly bill assistance</p> <p>Ensure low-income households at one utility receive a comparable level of assistance to households of another utility</p> <p>Prioritize funding to households with greater assistance need</p> <p>Track progress based on program participation rates and reductions in energy burden</p> <p>Conduct third-party low-income needs assessments that examine disproportionate outcomes on historically marginalized groups</p> <p>Establish statutory goals related to household outcomes, such as program participation rates and reductions in energy burden</p> <p>Ensure rural utilities with a disproportionate share of low-income households can meet energy assistance need without rate hikes</p> <p>Provide assistance in the preferred languages of households beyond written translation</p> <p>Extend assistance to households when they sign up for electric or natural gas service</p>
<p>80.28.068 (2021)</p>	<p>Requires investor-owned utilities propose low-income discount rates to the UTC, after seeking input from advisory groups.</p> <p>Programs must be delivered with community action agencies or other community organizations, and with streamlined eligibility rules</p>	<p>Apply to consumer-owned utilities</p> <p>Achieve statutory goals specific to household outcomes, such as program participation rates</p> <p>Conduct third party low-income energy assistance need assessments</p> <p>Extend assistance to households when they sign up for electric or natural gas service</p> <p>Provide service in the preferred languages of households</p>

Appendix C: Summary of utility actions and plans

Commerce reviewed utility actions since 2020 and their future plans submitted as part of their Sec. 120 reporting. The grouping of the past actions and future plans were made available to the data advisory group and the public, with both groups encouraged to suggest revisions.

The summary of past actions since the enactment of CETA show investor-owned utilities and Mason County PUD No. 3 (four utilities, or 7% of all utilities) are making significant revisions to their programs, including aligning their bill assistance programs with the eligibility criteria set in CETA and substantially bolstering their programs on multiple fronts. The majority of programs are either making tweaks, incrementally increasing existing programmatic efforts or funding, or maintaining programs or evaluating what to do.

Program element	Summary issues with Washington's patchwork of programs
Availability	Only three utilities offer monthly bill assistance programs open to all low-income households.
Accessibility	Most programs are not open to all low-income households. Many programs are not sufficiently funded to meet energy assistance need, and many are not realistic options for some households.
Visibility	Barriers to program access often extend beyond programmatic eligibility requirements to include significantly different application requirements, varied and often limited enrollment processes, often incomplete information about eligibility and application requirements, and other barriers to understanding and enrolling.
Clear and consistent communications	Where utility programs exist, there is a general lack of awareness about programs among households and community organizations, perhaps because there is no singular program applicable to or recognized by households, compared to statewide programs open to all low-income households.
Rigorous program evaluations and metrics	Communications and outreach are disjointed across utility service territories, and complicated by overlapping service territories and sometimes multiple energy utility providers per household.
Adequate funding	Most utilities do not track program participation rates or do not feel confident enough with their estimates to report participation rates to Commerce.

Utility past actions summary

Categories of past actions	Count	Percent
Utilities making incremental changes or tweaking programs	18	33%
Utilities planning to maintain programs or evaluating what to do	12	22%
Broad and deep reforms	4	7%
Created first program or programs	4	7%
Not enough information	2	4%
No information submitted	15	27%

Utility plans do not demonstrate a break from past trends, and do not signal significant transformation of assistance programs. The portion of utilities making tweaks or incrementally increasing programmatic efforts or funding, maintaining programs, or evaluating what to do is relatively unchanged.

Table I: Summary of utility plans

Plans	Utility count	Percent
Utilities making incremental changes or tweaking programs	22	40%
Utilities maintaining programs or evaluating what to do	19	35%
Broad and deep reforms	2	3%
Created first program or programs	1	2%
No information submitted	11	20%

These plans forecast uneven progress across Washington's utilities, with few expected changes from the status quo for low-income households statewide. **This is concerning because of the significant levels of need, low program participations rates, and absence of monthly bill assistance programs in many parts of the state.**

Appendix D: Utility program participation by county

State law and administrative rule define low-income as household incomes that do not exceed the higher of 80% AMI or 200% FPL, adjusted for household size. In most cases, 80% AMI is higher than 200% FPL, adjusted for household size. In only a few counties is 200% FPL higher than 80% AMI for some household sizes.

Commerce compared duplicate utility program participant data to the number of low-income households identified by the 5-year American Community Survey (2017-2022) in each county at or below 80% AMI. Commerce subtracted the number of subsidized rental housing units from the total number of eligible households, because subsidized housing programs often consider home energy costs when determining housing subsidies.

These numbers likely overestimate the number of households enrolled in utility programs, because households enrolled in more than one utility program are counted multiple times. This data indicates program participation in utility low-income energy assistance programs is roughly 20%.

County	2023 duplicate utility program participants / 2023 unduplicated SNAP households	Difference in the number of 2023 unduplicated SNAP participants and 2023 duplicate utility program participants	2023 duplicate utility program participants / Low-Income Units at 80% AMI (ACS 2017-2022)	Difference between Low-Income Units at 80% AMI (ACS 2017-2022) and 2023 duplicate utility participants
Adams	42%	1,218	32%	1,286
Asotin	41%	1,771	31%	2,457
Benton	19%	13,134	12%	18,477
Chelan	21%	4,239	10%	8,654
Clallam	14%	5,789	7%	10,481
Clark	13%	33,309	7%	60,730
Columbia	58%	74	15%	517
Cowlitz	1%	14,262	1%	14,981
Douglas	0%	4,588	0%	4,577
Ferry	18%	1,469	21%	1,138
Franklin	13%	7,594	10%	8,331
Garfield	5%	673	8%	411
Grant	10%	7,777	6%	11,211
Grays Harbor	30%	5,999	20%	9,157
Island	47%	1,787	13%	9,339
Jefferson	27%	1,655	10%	5,116

County	2023 duplicate utility program participants / 2023 unduplicated SNAP households	Difference in the number of 2023 unduplicated SNAP participants and 2023 duplicate utility program participants	2023 duplicate utility program participants / Low-Income Units at 80% AMI (ACS 2017-2022)	Difference between Low-Income Units at 80% AMI (ACS 2017-2022) and 2023 duplicate utility participants
King	79%	18,393	23%	170,420
Kitsap	18%	13,035	8%	30,178
Kittitas	29%	2,206	11%	6,135
Klickitat	13%	2,869	12%	2,904
Lewis	19%	7,846	15%	9,363
Lincoln	36%	778	25%	1,209
Mason	31%	6,562	35%	5,211
Okanogan	0%	5,415	0%	6,770
Pacific	18%	2,480	12%	3,775
Pend Oreille	5%	2,216	5%	2,124
Pierce	19%	69,883	13%	94,040
San Juan	93%	40	17%	2,303
Skagit	34%	7,526	22%	11,233
Skamania	9%	1,232	6%	1,777
Snohomish	41%	23,351	14%	82,956
Spokane	44%	29,485	28%	48,908
Stevens	47%	2,574	30%	4,999
Thurston	29%	16,801	16%	31,340
Wahkiakum	13%	480	8%	778
Walla Walla	20%	3,908	11%	6,756
Whatcom	45%	7,822	19%	24,068
Whitman	71%	743	19%	6,854
Yakima	21%	26,733	20%	24,341

Appendix E: Utility actions from 2020 to 2022

This content is published exactly as it was shared with Commerce. There has not been any editing.

Broad and deep reforms

Avista

Low-Income: Avista contracts out to a third party evaluator to conduct a Process Evaluation every other year and an Impact Evaluation annually. These recommendations are analyzed internally and program changes are made as appropriate. Evaluators review data and project documentation as well as customer, CAA, and project manager interviews. In most instances, Avista's Low-Income Weatherization program received realization rates of 99% or above.

FUNDING

Bill Assistance

- 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 seven percent, 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). In compliance with these aforementioned orders, Avista filed its annual seven percent 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 31, 2020.

- Docket No. U-200281, the Commission's Response to the COVID-19 Pandemic, which it adopted in its Order 01, included a Revised Term Sheet that set forth various requirements, such as the provision of additional funding for bill assistance programs and creation of additional customer programs to help support COVID-19 recovery efforts for Avista's low-income customers.

- 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). COVID-19 Debt Relief began in April 2021, with a budget totaling \$6,517,040,12 and provided assistance via two separate grant types: an Automatic Grant and a Forgiveness Grant. For the Automatic Grant, see "Programs" tab column K. The second element to the Debt Relief offering was available to residential customers at or below 200% FPL, but without a history of receiving income-qualifying assistance, were encouraged to contact their local Agencies 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.

Low-Income Weatherization

Funding remained steady at \$3m annually since 2020-2022. In 2023, funding increased to \$4m to serve more low-income customers who need weatherization projects to help increase energy efficiency in their homes, while reducing their bills. The Program is anticipated to receive another increase in 2024 and 2025 biennial budget of \$4.25 million annually or \$8.5 million for those two years.

MARKETING & OUTREACH

Bill Assistance

- Avista outreach was suspended for a period of time due to COVID-19 while the team strategized about how outreach could still be conducted while protecting staff and public safety. During this time, energy saving items along with information on billing and payment options and bill assistance were dropped off at food banks and provided to partners for their clients, reaching approximately 7k households.
- 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.
- In an effort to engage hard-to-reach and underserved customers to distribute funds through the Company's COVID-19 Debt Relief Program, Avista worked creatively with CAAs to develop a Community Partner Network (CPN). 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 CAAs 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.
- 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.
- To safeguard customer and community safety, the company had to pivot standard outreach strategies during the pandemic. These new strategies included: hosting virtual Energy Assistance days; mailing kits to customers (approx. 1,400 distributed via mail); sending Business Reply Cards (BRC) to all customers with past due balances to return and request a free home energy kit and Energy Guide; dropping energy kits off 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 (estimated that approximately 4,983 customers received the conservation education materials and information through these partnerships during the 2021-22 program year).

Low-Income Weatherization

- Outreach during the pandemic was problematic early on. Emerging from the pandemic around 2022, Avista cautiously revamped outreach activities to ensure public and staff safety and well-being. Outreach options including mailing energy efficiency kits and dropping up energy efficiency items to food banks, which included program flyers. To serve customers in a safe manner, the outreach team dropped off energy-saving items and information at food banks, participated in mobile food bank drive-through events, and partnered with community-based organizations to provide home energy kits to their clients. In many instances, the previous program managers for the Low-Income Weatherization program as well as Bill Assistance promoted both programs when appropriate.

- With the program delivery modifications, Avista conducted only one energy assistance day in 2022 with limited participation and a small number of workshops.

- In addition to providing the traditional path to serving income-qualified customers with energy efficiency, Avista also continued to partner with a local community action agency in Spokane County to provide no-cost weatherization services to all residents of a resident-owned mobile home community.

--As mentioned in the Outreach Assessments tab, customers who participate in the Low-Income Weatherization program are often referred through Avista's partner community action agencies as recipients of various bill assistance programs. Avista often provides referrals each year from its customers service department and the company's Customer Assistance Referral and Evaluation Services program.

- Other referrals are the result of various outreach events Avista hosted or was invited to attend through workshops, energy fairs, and mobile and general outreach efforts. Each method included demonstrations and distribution of low- and no-cost materials with a focus on energy efficiency, conservation tips, and measures, and information regarding energy assistance that may be available through CAA's.

PROGRAM DESIGN

Bill 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 electric and 36% were natural gas.

- 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.

- 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. 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 LIRAP Arrearage Management Program (AMP) launched in April 2021 and 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 can receive a benefit that covers 90% of their 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 is 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 to encourage payment behavior of regular, on-time payments, while also reducing the burden a past due balance places on customers. The AMP can also be offered to customers in instances where energy and emergency assistance have already been utilized yet there is still a need for assistance with unpaid arrears.

- In the wake of COVID-19, Avista's LIRAP was set to have an exorbitant carryover balance for the 2021-2022 program year due to the many other funding sources being provided to the Agencies to assist customers. To decrease this balance and further provide assistance to customers in need, the Automatic Hardship Grant was recommended and supported by Avista's Energy Assistance Advisory Group (EAAG) as a one-time grant for Avista customers who (1) had an account 60+ days past-due, (2) had a past-due balance larger than \$100, and (3) had not received LIRAP or Project Share assistance during the current program year. On August 22, 2022, Avista provided grants to 8,689 customers meeting these criteria.

Low-Income Weatherization

- The company continues to gather information and data about where these customer groups reside and how the weatherization message is best delivered. This occurs through a variety of ways, including input from the Company's Equity Advisory Group, Energy Efficiency Advisory Group, use of its Named Communities Map derived from the Department of Health's Health Disparities Map, and the use of the data to assist in locating Avista customers with high energy burdens.

PROGRAM EVALUATION

Bill Assistance

In February of 2021, Avista hired a full-time Bill Assistance Program Data Analyst to enhance how we were collecting and evaluating data for bill assistance programs in order to support program design, implementation and improvements as necessary. The Data Analyst provides interested parties, both internal and external, with regular reports (monthly, quarterly, annually) on individual program performance, funding distribution, participant demographics, saturation, and more.

Low-Income Weatherization

As stated before, Avista uses a 3rd party to conduct an impact evaluation and program evaluation of this program. Avista takes these recommendations to modify its program to continuously improve its design and effectiveness to serve the low-income customer within Avista's service territory. Avista continues to revisit its unit energy savings (UES) assumptions for measures as part of its annual business planning process. Avista also continues to re-evaluate the units used to set program participation goals for a given year.

Mason County PUD No 3

Several changes have been made to the district's Programs between 2020 and 2022.

1) A new program called the Low-Income Energy Assistance Grant specifically developed to comply with the Clean Energy Transformation Act (CETA) was implemented in October 2022. In the program, qualified applicants receive \$325 credit applied to their account. Two of the eligibility requirements include meeting the low-income definition in CETA and having an energy burden at or above six percent (6%). Program implementation was a large undertaking since the income verification screening and administration of the program was going to all be handled in house. The policy for the program was set, however the staff thoroughly questioned the parameters penciled in the process pathway to meet the requirements in a thoughtful and reasonable way while focusing on reducing barriers whenever possible. This meant documenting process, engaging with customers, community-based organizations, and supervisors to ultimately find what works. This work is important to recognize because it likely would not have been as successful if it was administered by a third party. Many applicants could have been denied when a change in the process would have fixed the issue. An example of this in action is the policy requirement to provide supporting documentation of income. In the first couple of months of the program, some applicants showed extenuating circumstances in which they were not able to provide proof of income or had no income. To mitigate this barrier and provide the much-needed assistance, two new forms were developed: a Self-Declaration of Household Income and a Self-Declaration of No Income. This way the applicant can execute an attestation to reflect their income for the year and use it as the supporting documentation. Adjustments such as this were made multiple times until the final process was determined. A full-time staff position was created to focus on this program.

2) The Project Share Program income eligibility was changed effective October 2022 to align with the CETA definition of low income.

Changes made since 2022 as well as any plans for the district's Programs are listed in question #2.

PacifiCorp

PacifiCorp proposed revisions to the Low Income Bill Assistance (LIBA) bill discount program filed under Docket UE-210533 on July 2, 2021, and WUTC approved proposed tariff revision effective August 1, 2021. The changes included the following:

- 1) LIBA program offer three discount tiers based on income qualifications and expanded income threshold for the Tier 3 discount level to the greater of 80% AMI or 200% FPL.
- 2) Changed the method of calculating discount from applying credit to monthly usage in excess of 600 kWh to a straight percentage discount of net monthly bill
- 3) Eliminated annual cap to allow program enrollment to all income qualified customers.

The expansion of the income guideline and removal of annual enrollment cap significantly increased program participation.

For Low Income Weatherization program, PacifiCorp submitted a filing with the Commission on December 21, 2021, to make changes to Schedule 114 and received approval for the following effective February 1, 2022:

- 1) Increase funds available for repairs from 15 percent to 30 percent. The change designed to mitigate or reduce number of homes deferred due to required repairs before weatherization work commence.
- 2) Permit installation of electric heat to replace permanently installed electric heat, space heaters or any fuel source except natural gas with adequate combustion air as determined by the Agency. The changes are

designed to promote the installation of electric heat and minimize use of wood heat, solid fuels, or natural draft equipment in specific applications where combustion safety (and indoor air quality) cannot be maintained.

3) Expanded income guideline to align with WAC 194-40-030 definition of low income

Puget Sound Energy, Inc.

PSE WAP:

Program staff continued to adaptively manage LIW in response to COVID-19 related challenges in 2021. Challenges included program delays, production impacts, and safety protocols required by Commerce for partnering agencies. The LIW program also demonstrated continuous improvement by partnering with internal and external stakeholders to develop a Phase 2 Low Income Needs Assessment (LINA) report, which was released in December 2021. This report was the qualitative complement to the LINA Phase 1 report released October 2020. PSE developed an action plan in response to the LINA Phase 2 report recommendations with a timeline for implementation and continued to make progress on the action plan through 2022 in partnership with PSE bill assistance programs, the Energy Project, and community action agencies. Examples of progress include but are not limited to, planning and the launch of a dedicated LIW PSE landing page, transcreation, participated in “Ask an Expert” events where we directly answered customer questions in a webinar format 2x annually, and worked with marketing and communications to strategically target customers who would be likely candidates for the program. Despite both program and production delays related to COVID-19, PSE demonstrated progress by launching a marketing and outreach campaign in the last quarter of the year. The campaign targeted 10 high needs census blocks in south King County, identified through the PSE LINA Phase 1 report, and consisted of targeted messaging via email and social media. Program staff were able to establish educational and awareness partnerships with 10 trusted, local community-based organizations as a result of this campaign.

PSE HELP: In 2020 PSE removed the LIHEAP “exhausted rule”, which required that customers eligible for LIHEAP receive LIHEAP prior to receiving PSE HELP. Additionally, during the pandemic years, the agencies allowed for mailed in documents and over the phone appointments rather than requiring in person documents and appointments. 10/1/21 PSE raised the income eligibility from 200% Federal Poverty Line to 200% Federal Poverty Line or 80% Area Median Income, whichever is greater. This change greatly increased the number of customers eligible for the program. PSE also raised the minimum grant amount from \$100 to \$250, providing greater assistance to each HELP recipient. In 2022, PSE adapted its grant calculation formula to better fit that new availability of the program and also added in a 15% supplemental gas usage into the calculation to inflate the grant in advance of anticipated large rate increases.

PSE HELP (Temp. AMP): This program did not exist between 2020 and 2022.

PSE WHF: At the end of 2018, PSE added the ability for customers to donate to the Warm Home Fund with their one time or recurring online payment. This resulted in an average sustained increase in donations of almost \$500K per year (2018-2023). In 2021, PSE also changed the eligibility to align with CETA definition and increased the available funding amounts from \$300 to \$600 per customer. Additionally, currently, there is also no requirement to have a disconnect notice to receive assistance from WHF, as long as the customer has already received assistance from PSE HELP or is waiting and potentially up for disconnection.

PSE BDR: While this program was not live in 2020-2022, in 2022 PSE began design and collaboration work with internal and external stakeholders on the Bill Discount Rate project in preparation of launching the program October 1, 2023.

PSE Community Solar Income-Qualified:

PSE launched the program in October 2021 with the first solar project site at Olympia High School. In 2022, three more projects were opened for subscription.

Specific to assistance programs, PSE's digital presence has evolved, focusing on reaching vulnerable populations who will benefit from accessing assistance programs. As a result of this more targeted digital presence, the PSE.com assistance pages were visited 739,537 times between January 2023 and September 28th, 2023. For the same time period in 2022 pages were visited 505,632, as compared to 130,090 in 2021.

Tweaked or retooled programs

Cowlitz PUD No 1

1. Warm Neighbor - Brought in house in end of 2020 to help better serve our customers and made slight funding changes during this time. This change will lead to streamlining the experience for customers by offering a one-stop shop for all Cowlitz PUD programs, leading to less confusion, and faster application processing times.

2. SDDR - CAP still administered during this time but we increased the discount rates in 2022 from 15% to 20% and 25% to 30%. These increased benefits will further reduce the energy burden of program participants.

Inland Power & Light Company

Before 2020, Inland did not have a direct bill assistance program or an insulation program. When members called in needing help, they were directed to a third party that could provide assistance. In 2022, inland launched its insulation program, this program installed attic insulation in homes to qualifying members. In 2023, Inland continued the insulation program and added the direct bill assistance program.

Orcas Power & Light Coop

During the period of 2020-2022, OPALCO identified new program needs due to the COVID pandemic and implemented additional bill assistance programs, upheld the Governor's moratorium on disconnections and budgeted additional funding to the existing assistance programs. The partnership with the three Community Resource Centers in the County deepened and OPALCO contracted with them to provide direct service to our members in need of energy assistance.

Seattle City Light

To unify recordkeeping and provide customers with a single form to apply for bill assistance, Seattle City Light and Seattle Public Utilities created "Utility Assistance Programs Automation," an Enterprise Content Management system. This provided our customers with the opportunity to apply for our programs online, including uploading financial eligibility documentation.

Snohomish PUD No 1

- i. We have added several auto-enrolment partner agencies to streamline the enrolment process, with more underway
- ii. We have added geospatial data to our conservation potential assessment so we can get more granular with program participation
- iii. We continue to partner with local and national groups to advocate for more direct utility funding through Federal and state packages.

Incrementally increased funding, outreach, eligibility, or benefits

Benton County PUD No 1

Benton PUD made multiple changes between 2020 and 2022 and plans to continue to make changes as necessary.

Low Income conservation funding was increased from \$230,000 (CAC \$80,000.00, BPUD Low Income Conservation Weatherization Program \$150,000.00) in 2020 to \$300,000.00 in 2022 (CAC \$200,000.00, BPUD Low Income Conservation Weatherization Program \$100,000.00). Funding for the BPUD Low Income Conservation Weatherization was decreased and applied to the CAC contract to help leverage more state matchmaker funds to enable CAC to help more customers.

In mid 2020 we started implementing service order processes through our CIS system to better track locations of where conservation measures were being installed.

In October of 2021 we changed how our approved contractor list worked. Prior to October of 2021 we required two separate contractors, one for the regular residential program and one for the low-income program. By requiring two separate contracts we noticed it limited the number of contractors low income customers could choose from to install conservation measures. We decided to combine the contracts into one giving our low income customers are much larger contractor network to choose from.

Benton PUD also increased rebates for Heat pumps from \$3,800 to \$6,200, DHPs from \$3,800 to \$4,400, and insulation from \$1.25 / sq ft to \$3.00 / sq ft.

At the end of 2020, we also started managing Helping Hands donations through a feature of our Customer Information System. This allows customers to self-enroll in the program through our app. It also offered the new option to round up their bill every month to the nearest dollar. Previously the only options were a one time donation or a fixed dollar amount every month. Another improvement to the Helping Hands program was related to amount of assistance for each customer. Donations were increasing but fewer customers were applying for the assistance. We worked with CAC to determine that the assistance amount was smaller compared to the larger sums available through LIHEAP, state COVID assistance, and state arrearage funding. Customers were choosing not to apply for the smaller amount. We increased the assistance amount to \$300 for all households, regardless of family size, and realized a resulting increase in applicants for the 2023 program year. The 2023 change increased the number of recipients from 103 in 2022 to 157 in 2023, which is a 52% increase.

Our COVID assistance program was initially launched with a three month application period (May 2021-July 2021). After seeing the initial success of the program and the impact on past due arrearage balances, the application period was extended for a second phase to allow new applications through January 2022 in order

to have a larger impact and help more customers with their accumulated pandemic balances. We expanded our Veteran/Active Military discount to include widows/widowers of these service members as well.

Douglas County PUD No 1

2022 was the first year we implemented our CETA Energy Assistance program. Since then we have evaluated the reach and increased our outreach methods.

Ferry County PUD No 1

Other than to increase the income level for participation in the Senior Low-Income Discount Program, the Utility conducted its own survey of actual customers to get a better feel for energy assistance needs.

Grays Harbor County PUD No 1

On December 22, 2021, Grays Harbor PUD (District) submitted their Clean Energy Implementation Plan that included our plan to increase effectiveness, and provide continued assistance to our customers. The District's mission is to serve our community with high value utility services at the lowest practical cost. During this period the District established the following categories to improve customers awareness and expand District outreach:

Education: This includes awareness of energy consumption and efficiency literacy topics, including how to best operate equipment to minimize energy usage and understanding the importance of preventative.

Renters/Landlord Split Incentive: This is the difference in motivations between landlords, who own the property and seek to minimize capital costs, and renters, who typically pay the utility bill.

Program Requirements and Income Limits: Seniors and others may need assistance, but may be unaware that they qualify, or may be just beyond the limits of established programs.

Based on the above considerations, the District identified the following strategies to reduce the energy burden to highly impacted communities and vulnerable populations in its service territory, some of which it has already begun to implement:

1. Expand energy education. For many years, the District has participated in the County Fair, Home and Garden Shows held at the Elma Fairgrounds, and the Ocean Shores Project Connect biennial event. The District has offered presentations about residential energy efficiency and the various programs available to groups including senior and homeowner associations as well as mobile home communities. The District continues to broaden these efforts to increase awareness of low-income program offerings among a more diverse audience by expanding their outreach to address needs of vulnerable populations in our communities.
2. Expand low-income program offerings communications. The District currently advertises its low-income program offerings through several channels, including the District website, monthly newsletters, radio programs, social media and local newspaper advertisements. The PUD website has a foreign language translation feature and text to speech for visually impaired customers. The District continues to evaluate and work towards offering additional translated print and website materials with the hope of reaching a broader audience.
3. Low-Income program administration was moved in house.

Jefferson County PUD No 1

Between 2020-2022 JPUD increased the amount of the LI discount to mitigate the effect of rate increases. Additionally the income eligibility level for the senior low-income program was increased.

Klickitat County PUD No 1

Between 2020 and 2022, KPUD undertook several initiatives to enhance the effectiveness of our programs: - Building upon our compliant low-income weatherization program and low-income senior bill discount program, we enhanced these efforts by offering increased rebate values for residential home upgrades and augmenting the budget allocation for the senior program. - Conducting audits of annual high bills enabled us to identify customers experiencing bills higher than the utility standard. We proactively reached out to these customers to provide guidance and options for reducing their energy usage. - The implementation of our AMI meters commenced during this period, providing us with real-time technology to identify energy consumption problems promptly. We utilized this technology to offer educational training to our customers, empowering them to identify areas of energy consumption within their homes. We anticipate that with additional data reporting and analysis, informed by our energy needs assessment for vulnerable populations, we will further refine our strategies for energy conservation and assistance. Following the recent State Audit, which has just concluded, we have identified a few findings that were not addressed in time for implementation before 2024. Specifically, we did not complete a cumulative assessment, failed to identify demand response targets, and did not evaluate the most suitable program income base between AMI and FPL. To rectify these gaps, we plan to engage a consultant to address these issues and implement necessary changes accordingly.

Lewis County PUD No 1

The PUD received \$1.2 million in 2020 and \$1.4 million in 2022 from the TransAlta Coal Transitions Board for our low-income energy efficiency program. With these funds, we were able to continue offering our low-income energy efficiency program focused on providing ductless heat pumps and weatherization. We held a contractor training in 2022 aimed at increasing knowledge of the program to our participating contractor base and to answer any questions about the program. Often, customers hear about the program through these local contractors so increasing their knowledge of the program is important. Lewis County added a low-income senior bill discount program in 2023.

Modern Electric Water Company

From 2020 to 2022, Modern enhanced accessibility, streamlining our application process for bill assistance programs, making it easier for customers to access and navigate. We expanded our outreach by hiring a communications coordinator and implementing targeted outreach campaigns. Our utility staff has worked diligently to increase awareness of bill assistance programs among eligible customers, ensuring that those in need are aware of the support available to them. Our staff has improved communication with our customers regarding the availability of assistance programs and the offerings we have. We use clear and concise communication strategies to effectively communicate program details, eligibility criteria, and application procedures to our customers, reducing confusion and increasing participation rates. Modern's staff often identifies trends and patterns in customer usage and payment behavior, allowing for more targeted and efficient allocation of bill assistance resources to those who need it most. Our utility has forged strategic partnerships with community organizations, social service agencies, and other stakeholders to leverage their networks and resources in reaching underserved populations and maximizing the impact of bill assistance offerings. When the opportunity arises, we gather input from customers and stakeholders, allowing for ongoing refinement and improvement of bill assistance programs based on evolving needs and challenges. In addition to providing bill assistance, our utility empowers our customers with the knowledge and skills needed to

manage their energy usage and expenses effectively, thereby promoting long-term financial stability and resilience.

Parkland Light & Water Company

Project Round Up requirements and maximums changed after the end of Covid-19. We again provide assistance to residences only who are 300% fpl, or have a life event causing hardship. The maximum pledge is \$300 per 12months. (down from \$500 due to COVID-19).

We made changes to allow funding to be distributed to more applicants that qualify.

We have also began mailing applications and resource fliers to residences that have been identified by collections.

Pend Oreille County PUD No 1

The Neighbors in Need Grant Program was modified January 1, 2022 to include the income verification component so that program participation will qualify going forward.

Peninsula Light Company

Throughout the covid-19 pandemic, Peninsula Light Co. waived the Project Help application process and immediately applied \$400 billing assistance to electric accounts if a member verbally stated they were in need. In 2022, Peninsula Light Co. increased its total household income guidelines to 225% FPL to allow for more members to be eligible for billing assistance.

Skamania County PUD No 1

Between 2020 and 2022 Skamania PUD increased the channels in which customers were reached. The District has expanded its outreach through a local organization (local church) and Klickitat County publication. The District expanded the eligibility criteria to include all low income individuals and not exclusively those over the age of 65.

Tacoma Power

For energy efficiency programs:

Low income certification has been streamlined where eligibility is automatic for customers currently approved for Low Income Home Energy Assistance Program (LIHEAP) or Bill Credit Assistance Plan (BCAP). This reduces need for a complete and redundant Low Income certification process.

For utility bill assistance programs:

Low income certification has been streamlined where eligibility is automatic for customers currently approved for Low Income Home Energy Assistance Program (LIHEAP). In addition, customers enrolled in the Bill Credit Assistance Plan automatically receive a credit each month equal to the amount of the fixed customer charge.

Tacoma Power has also entered into Memorandum of Understanding (MOUs) with multiple agencies who work with United Ways Centers For Strong Families to provide financial education along with other valuable resources for limited income households. Customers who complete a free consultation with a certified financial coach also receive a one-time credit applied to their utility account.

Began a program or programs

Benton Rural Electric Assn

Implemented a new Bill Assistance Program in January of 2022 called Power to Care. Benton REA members can voluntarily contribute by rounding up their bills, a set monthly donation or a one time donation. Benton REA also contributes to the program and to date and contributed more than \$42,000. Benton REA has made some changes to how we administer our programs, particularly with the income based energy efficiency programs and has went from no participation to a moderate level of participation. Benton REA has implemented a strategic communication plan to promote our income based programs, which has resulted in increases to all Benton REA programs. Included in our communications plan is a focus on reaching the spanish speaking population.

Big Bend Electric Coop, Inc

From 2020-2022 Big Bend Electric Cooperative has implemented two low-income programs for co-op members. We implemented a low-income energy assistance program that is operated and maintained entirely in-house. This is a short-term emergency assistance plan that credits \$200 per calendar year to eligible households. This program has been well received by our members and has continued to increase participation numbers each year.

Marketing methods have been adjusted to include radio ads, distributing flyers at area food banks and health clinics. We are continuing to research more targeted methods.

We have also implemented a low-income energy efficiency program in partnership with local CAP agencies Benton/Franklin CAC based in Pasco. This is a long-term assistance solution to our eligible members who need assistance in weatherizing their homes and improving or replacing HVAC systems. This program also allows for assistance to those who rent. Home improvements are made with energy efficiency incentives and in return, the homeowner signs an agreement to not raise rental rates for a period of time. This allows for low-income renters to benefit from reduced energy burden while also avoiding increased rental rates. This program continues to increase participation numbers and we continue to market it on a variety of platforms.

Chewelah Light Department

We began a program that did not exist.

Kittitas County PUD No 1

Initially, our Low Income Program monthly discount was set at \$1 by our Board of Commissioners and customers were required to apply. This was an attempt to begin assessing need and participation levels before additional funds were committed to the program. Based on customer feedback, the Board of Commissioners increased the monthly discount to \$10 and removed the requirement for customers to complete an additional application to qualify.

Evaluated what to do

Chelan County PUD No 1

For the work with CAC, we have tried to push the agency to do more weatherization but they have struggled with staffing. In 2024. we are working on an integrated approach to maximize both ComfortPlus funding with

CAC funds to help more homes in Chelan County. In process of evaluating energy assistance program for low-income customers.

Clark County PUD No 1

Clark Public Utilities has continued to evaluate the effectiveness of all of our current low income energy assistance programs to determine if there are measures that can be taken to improve program participation and outcome and to identify the existing gaps to meet the Clean Energy Transformation Act mandates. The Guarantee of Service Program was the first program identified for review and an in depth review was done of the program parameters, historical participation rates and program outcomes. Upon review of the data, it was determined that redesign of the Guarantee of Service Program would not successfully meet reach the goals set forth in the Clean Energy Transformation Act. It was decided that most appropriate course of action would be to redirect efforts to the design of new programs that would more effectively address the reduction of energy burden in low income households as well as serve customers up to 80% AMI.

Wahkiakum County PUD No 1

The PUD continues to market our low income programs to customers. Internally, we discuss the programs any ways to improve outreach and effectiveness. The PUD will continue to work with our partners to provide assistance to lessen the energy burden on our low income customer base. We look forward to completing a Clean Energy Transformation Act Study and implementing suggestions that will benefit our low income community.

Maintained programs

Centralia City Light

No changes needed based on current interview procedures.

City of Cheney Light Dept

Not much was done to improve the two programs, Cheney Outreach and BPA conservation. These were the COVID years and most low income assistance was provided by Federal CARES Funds and a local Spokane County program that does not qualify as a City CETA program. We continued to advertise the Cheney Outreach program on our website, in our mailers and at the Finance office.

Franklin County PUD No 1

All programs are available to all customers that meet the income level requirements for the programs. All federal funds available such as Cares, ARPA and others were requested and distributed to customers that were eligible in order to assist customers after the COVID pandemic when customer outstanding balances became very high.

Grant County PUD No 2

As of April 1, 2024 we have not received the final results of the 2019-2020 audit. Changes were not made between 2020 and 2022 to our programs due to not having received feedback from the state.

Ohop Mutual Light Co.

During the COVID disconnect moratorium most customers who were behind on their bills did not take advantage of assistance programs. Operation Round Up experienced very little interest and unfortunately the

number of seniors participating in Senior Discount decreased significantly as they left the area or passed on. We are still ramping those programs back up and are looking forward to increasing participation significantly in the coming years.

Okanogan PUD No 1

Available assistance programs during 2020-2022 were fairly effective, as our Districts arrearages from COVID were some of the lowest in the State.

Additionally, District customers who follow through with seeking assistance from either Okanogan County Community Action Council or the Confederated Tribes of the Colville Reservation, have been successful.

Pacific County PUD No 2

The District feels that its programs have been and continue to be effective at meeting the needs of our rate-payers as evidenced by our low rates and an absence of rate increases. As such, there were no substantive changes made 2020-2022. Honestly it has been a struggle to provide the staff time and funding to focus on improving program effectiveness. That being said, as mentioned elsewhere the District has improved program promotion through social media, website and direct contact with our CSRs. We have also improved our presence in our community through being involved in more events. This gives us the platform to engage our customers face to face while not being 'behind the counter.' We will continue to engage our customers in these ways.

Steilacoom Public Works

2020-2022 covered a portion of the COVID years. Additional funding became available through CARES, ARPA, and other programs. Although not specifically targeted at low income, these funds allowed us to provide additional assistance in our utility assistance program. No specific changes were made in the program offered by the Town during this time period.

Tanner Electric Coop

Made sure funds are available for those in need of assistance.

Not enough information

Elmhurst Mutual Power & Light Co

We identify challenges customers have in accessing the funds and work to simplify our processes or those of our partners to make the funds easier to access.

Richland Energy

In October 2023, we increased the incentive amounts for all low-income energy efficiency measures.

Elected not to submit information or has not reported

City of Blaine

City of Coulee Dam

City of Sumas

City of McCleary Public Utility

City of Milton Electric Division

City of Blaine

City of Port Angeles

Clallam County PUD No 1

Ellensburg Energy Services Dept

Lakeview Light & Power

Mason County PUD No 1

Nespelem Valley Electric Coop

Vera Irrigation District #15

Has no residential customers

Asotin County PUD No 1

Whatcom County PUD No 1

Organized under Idaho law

Northern Lights Incorporated

Kootenai Electric Cooperative

Clearwater Power Company

Utility plans, 2024-26

Utilities included these future plans for 2024-26 as part of their submissions. These were intended or planned actions that may not have occurred, or may not yet have occurred. They are unedited.

Broad and deep reforms

Mason County PUD No 3

1) When the Grant was developed it was focused on prioritizing those customers with a high energy burden as stipulated by CETA. After considering others' interpretations of the language to prioritize those with a high energy burden, and to provide a better experience to customers with additional program efficiencies, it was decided to combine the Grant with the Project Share Program. The change was effective March 2024. Now there is one direct assistance program, one application, one set of requirements, and a tiered funding benefit with no impact to the budget. If the applicant does not have a high energy burden, they receive the lower benefit amount of \$175 and if they do then they receive the higher benefit of \$500, the same amounts as previously offered. This change will help reduce energy burden by expanding the eligibility of the primary bill assistance program and simplify administration.

2) Administration of the Project Share Program was moved in house in October 2023. It was previously administered through the Community Action Council (CAC). Staff had been considering moving administration in house since the new Grant program was established and when CAC provided notice it was going to start assessing a screening fee of \$15 per application it was quickly decided to do it. The change provided a reduced barrier to entry into the program as district staff is more readily available than they are at CAC. This will likely be the most effective change to increase the total funding provided and number of households benefiting from the program. It also gave staff the opportunity to streamline the Grant and Project Share program processes allowing the customer to simply submit one application for eligibility into three different programs; the Grant, Project Share, and the Low-Income Energy Efficiency Program (described below). If a customer has already gone through the district's eligibility process within the last six (6) months they do not have to go through it again. As stated in #1 above, this program was combined with the grant program in March 2024. This will also improve the programs effectiveness as it will no longer have to rely solely on donations for funding.

3) The Low-Income Senior Citizen and Low-Income Disabled Discount Programs are no longer available except to customers that were qualified and receiving service under the program's rate schedule effective January 2, 2023. Once a customer in the program's rate schedule terminates service at their location the discount is no longer available. For that reason, we expect the number of households enrolled and total program costs to decline over time until it reaches zero. The aggregate annual household bill savings, however, will increase whenever the system charge increases since the discount is 100% of the system charge. Given the low-income energy assistance program mandated in CETA changes to the Programs had to be made. This was a much better outcome than a full termination of the program which was a consideration. This change will also streamline the program offerings, making it simpler to communicate with customers.

4) The surcharge exemption started in 2023 at the same time the surcharge was implemented. The intent of the surcharge is to ensure the customers qualified as low income do not have to pay for the cost of the low-income programs. Enrollment is automatic and remains in effect for as long as the eligibility requirements are met. This change directly and automatically reduces energy burden for program participants. Success of this program is directly tied to the success of the district's programs. As participation increases or decreases in those programs this one will automatically see that effect.

5) A new program called the Low-Income Energy Efficiency Program specifically implemented to comply with CETA started in October 2023. In the program, qualified applicants receive an incentive for approved equipment installations. By implementing an energy efficiency program, it will provide sustained energy burden reductions to qualified low-income customers. In order to increase the funding provided and number of households benefiting from the new program, district staff will continue to engage contractors, homeowners, and customers to educate them about it.

6) A new program that provides a reduced back bill provision for qualified low-income customers came into effect February 20, 2024. In this provision, if a back billing is required, due to a faulty meter for example, it will be reduced to a six (6) month look back as compared to the policy which states 72 months.

Other changes the district is planning to make to improve the effectiveness of the stated mechanisms and strategies include the following communications improvements: 1) pay to "boost" social media posts to garner more attention; 2) continue to expand outreach opportunities for Spanish-speaking customers; 3) collaborate with online communities (i.e. Facebook community groups) to share information about assistance programs; and 4) while redesigning the website aim to create a more accessible environment for all, both linguistically and taking differing abilities into account.

In assessing the outreach effectiveness, it was identified there are few application submissions from tribal members and Spanish speaking customers. It is found when they do apply, they often do not follow through with providing the necessary supporting documentation. The district is planning to explore this concern further and obtain assistance from the Squaxin Island Tribe, community organizations, and potentially consultants with experience working with disadvantaged communities.

Puget Sound Energy, Inc.

As outlined in the Company's 2023 Biennial Clean Energy Implementation Plan (CEIP) Update, one of PSE's current customer benefit indicators addresses energy security, and is measured through arrearages and disconnections for non-payment, and energy burden. These metrics give PSE insight to the magnitude of the challenges customers are facing, and provide insight to the next steps PSE should take. Within the Biennial CEIP, PSE describes the specific actions to mitigate these barriers through the use of energy assistance programming. The intent of energy assistance programs is to lower energy burden for customers, and minimize instances of arrearages and disconnections. Each metric will be tracked over time to give PSE insight to the effectiveness of these energy assistance programs. Below are details for how each program intends to engage with customers, especially customers within named communities, and increase participation.

PSE WAP:

1) Targeted Marketing via paid social media advertising, email campaigns, print advertising including fliers, and postcards mailed to homes. This includes email campaigns and a postcard campaign to target high-risk or vulnerable customers based on income level, Named Communities status, and high energy burden customers. PSE will continue its commitment to build on program enhancements that reach customers by providing and improving in-language outreach and tools to its income-eligible communities. It will also explore other in-language strategies for non-English-dominant customers. 2) Feature the program at in-person and virtual events, including Ask and Expert events with content tailored to PSE assistance programs. 3) Continued close coordination with agency networks and the Energy Project (TEP) and increased coordination and collaboration with State Weatherization staff/utility staff to address state-wide issues such as workforce development, agency capacity, and interaction of state and federal funding sources; 4) Continued commitment by PSE to provide utility funding that keeps pace with inflation and rising construction costs. 5) Localized outreach efforts that increase customer trust and program access.

PSE HELP: PSE is currently improving the PSE HELP/Bill Discount rate application so we may approve more applications at a quicker speed. PSE will be creating a Spanish mail-out application to make it easier for Spanish speaking customers to fill out and return to PSE. PSE will continue to engage customer outreach and marketing teams in promoting the bill assistance programs for customers. We anticipate more discussions with interested parties to potentially incorporate measurements of reaching deepest need, and reaching our goal toward continuing to lower energy burden of our income-qualified customers.

PSE HELP (Temp. AMP): In 2024, PSE will launch its Arrearage Management Program, which will replace the temporary arrearage grant program with a robust program that will forgive 1/12 of a customer's arrearage for each monthly on time payment of their current bill. As part of that project, PSE will be enabling Spanish language online application for PSE HELP, BDR, and AMP. PSE is currently working with interested parties to develop this permanent Arrearage Management Plan. There will be more marketing, outreach, and events efforts specifically to promote the program to customers.

PSE BDR: PSE will be evaluating the bill discount rate and its impact on energy burden. PSE will be creating a Spanish mail-out application to make it easier for Spanish speaking customers to fill out and return to PSE.

PSE will continue to engage customer outreach and marketing teams in promoting our bill assistance programs for customers. PSE plans to monitor the second year of Bill Discount Rate renewals to gauge the drop-off rate, and plans to discuss with the Low-Income Advisory Committee.

PSE Income-Eligible Community Solar:

- 1) Targeted marketing via paid social media advertising, email campaigns, print advertising including fliers, and postcards mailed to homes. This includes email campaigns and a postcard campaigns to target high-risk or vulnerable customers based on income level, named communities status, and high energy burden customers. PSE will continue its commitment to build on program enhancements that reach customers by providing and improving in-language outreach. It will continue to activate other in-language strategies for non-English-dominant customers.
- 2) Feature the program at in-person and virtual events, including Ask and Expert events with content tailored to PSE Assistance programs.
- 3) Continue to adjust the on-bill energy credit to align with the "value of solar" identified through the IRP.
- 4) Localized education and outreach efforts that increase customer trust, awareness and understanding of the benefits of solar energy.
- 5) Add more solar projects to the system until the program reaches its goal of 50 MW total - a minimum of 30% set aside for low-income customers at no cost.

Outreach, marketing, and events:

PSE will continue to refine and adjust its outreach strategies to leverage data obtained about where customers in deepest need are and partnering with organizations who serve these customers to share information about assistance programs with them. In addition, as PSE's outreach team is learning more about our customers in need of assistance programs, we will continue to work towards decreasing barriers to them receiving information and education about these programs and signing up. Where possible, the outreach team will support signing customers up for these programs or guiding them where to do so.

New energy burden metrics:

Additionally, in the Company's 2024 general rate case (GRC), PSE proposed two new metrics to measure PSE's progress in reducing energy burden for customers: (1) "Energy Burden Efficacy" as the median percentage reduction in energy burden from energy assistance, among high energy burden customers who receive energy assistance, and (2) "Energy Assistance Delivery Depth" as the percentage of high energy burden customers who received energy assistance.

The energy burden efficacy metric would measure PSE's performance in reducing the energy burden of customers provided the benefit of energy assistance. PSE considers this a sentinel metric in assessing whether PSE is equitably distributing this energy benefit and helping to lessen the economic pressure of being in an energy burdened status. As seen in the section "Assessment of Programs" of this report, PSE already demonstrated some data showing the energy burden efficacy for 2022 and 2023 for the energy assistance programs discussed in this report: PSE WAP/LIW, PSE HELP, Temporary AMP, WHF, BDR, and Income-Eligible Community Solar.

The Energy Assistance Delivery Depth performance metric would determine what proportion of PSE's energy burdened customer population is receiving energy assistance. To calculate this metric, PSE would take the count of its energy burdened customer population that receives energy assistance and divide by the count of the energy burdened customer population. The higher the value for this metric, the greater success PSE is achieving at directing its energy assistance resource to its customers most in need of economic benefits. Conversely, a lower score would indicate that PSE should consider adjustments in its energy assistance delivery in order to be in alignment with CETA goals.

Utilities tweaking or retooling programs

Avista Corp.

FUNDING

Bill Assistance

- As of October 1, 2023, LIRAP no longer functions under a budgeted amount, but instead is "capless". Essentially, LIRAP funds will be available to meet the demand of the eligible customers that Avista serves.

- Avista has assembled a subcommittee of its Energy Assistance Advisory Group (EAAG) to design a new funding model for joint administration between CAAs and Avista. Per 2022 GRC Settlement: Avista will collaborate with its EAAG to determine the appropriate method, amounts, and administrative structure for future program years [beyond 2023-2024].* This new model will have impacts on the funding allocated to administer LIRAP beginning in October 2025.

Low-Income Weatherization

Beginning in 2023, funding for weatherization increased from \$3m to \$4m (in addition to \$1m for the Deferred Maintenance Pilot). The budget for 2024 and 2025 is expected at \$4.25 million each year.

MARKETING & OUTREACH

Bill Assistance

- Avista is working with a social impact communications agency to develop a strategic outreach and communication plan, which explicitly includes bill assistance programs. The strategic plan will inform actionable, high-impact communication efforts, and also connect Avista to CBOs to foster long-term partnerships.

- Avista is continuing to identify organizations that can serve as entry points to communities and likely income-eligible customers (CBOs, employers, Tribes, etc.)

- Expanded language accessibility on myavista.com, as well as the My Avista mobile app and print outreach materials

- Other marketing tactics planned for the My Energy Discount Washington program from April-September 2024 include: targeted digital ads; social media posts, targeted search ads; direct email campaigns; direct mail postcard; local newspaper ads; targeted publication ads; bill inserts; print and email versions of Avista Connections Newsletter

- Avista is planning to conduct customer and agency surveys with the aim of better understanding pain points and to improve the experiences of agency staff and customers alike.

Low-Income Weatherization

- Due to the program manager staff retirement of the Department's energy efficiency outreach coordinator and weatherization program manager for energy efficiency in 2022 and 2023, activities were put on a slight pause for the first half of 2023. In mid-2023, both positions were filled and the program manager (as well as the outreach coordinator) took lead position in helping to develop an outreach strategy and plan for 2024 and 2025.

- In general, customers who participate in the Low-Income Weatherization program are often referred through Avista's partner CAA's and Avista's Customer Assistance Referral and Evaluation Services program, which provides support for disabled, elderly, and low-income customers, or customers experiencing hardships related to employment, health, or finances.

- Other referrals are the result of various outreach events Avista hosts or is invited to attend. In partnership with the Company's energy efficiency efforts, its community and economic vitality department conducts conservation education and outreach for low income customers, seniors, individuals living with disabilities, and veterans.

PROGRAM DESIGN

Bill Assistance

- Further aligning LIRAP income guidelines with those of LIHEAP (i.e. what is and is not considered income) in order to improve customer and agency experience of program enrollment

- Based on results of 6% income verification for My Energy Discount Washington, program may undergo small design changes

Low-Income Weatherization

-After the Deferred Maintenance Pilot finishes the end of 2024, an analysis will be conducted to see if the Deferred Maintenance Pilot can be rolled into the program with increased funding for pre-weatherizing homes.

-After the Workforce Training Pilot ends in December 2024, Avista will work with various stakeholders to find a solution to fill the weatherization training gaps in Eastern Washington. While the CAA's have been actively working with customers for years, many challenges persist, including finding willing and eligible participants, navigating continued increases in labor and material costs, and delays in receiving products. While several partner agencies were able to fully spend their funds, others did not have the same success. Avista will continue to collaborate with partner agencies to develop strategies to overcome these barriers, which includes using this Workforce Training Pilot to address weatherization training needed for agency staff.

-Avista will take into considerations program design changes/recommendations from our 3rd party evaluator and does so on a regular basis.

PROGRAM EVALUATION

Bill Assistance

- Avista collects dozens of data points to evaluate the success of LIRAP, with a few high-level metrics being enrollment numbers, saturation rates, distribution of enrollment between the discount tiers, direct service funds spent, demographics of participants, and impacts of arrearage assistance on ongoing payment behavior. As we continue to gather this information, we are also working towards consolidating it into an accessible dashboard. This will further assist us in evaluating the data to identify where we might have gaps in participation, how effective our marketing and outreach efforts are, and much more.

- Saturation rate is a key measure for LIRAP, as it (1) illustrates how effective we are at reaching the eligible population and (2) aligns with the goals as defined in RCW 19.405.120 to reach 60% saturation by 2030 and 90% by 2050. This will continue to be an area of focus for Avista going forward.
- Avista intends on identifying saturation rates in Named Communities, and evaluating how those compare to saturation rates in general. This will help determine targeted outreach campaigns, and also identify any unintended consequences or gaps in the existing program design or outreach tactics.
- With income information now available through customer participation in My Energy Discount, Avista intends on better understanding the energy burden of their customers and effectively it is being addressed through program participation
- Avista also plans to collect and evaluate usage data on customers enrolled in bill assistance programs to understand if any behavior changes are occurring; essentially, does more affordable energy incentivize using more, which is counterintuitive to a foundational purpose of LIRAP being to "encourage energy conservation"

Low-Income Weatherization

- The program manager intentionally works with each CAA to gather continuous feedback on the program and future improvements.
- Outreach efforts are being looked at more strategically and will be fully executed mid-2024 and beyond. This includes collaborating with the My Energy Discount program manager to collaborate the best methods to reach as many low-income customers as we can to serve their need by reducing their energy bills and increasing their energy efficiency by helping them with weatherization projects in qualified homes.
- Avista takes into consideration all program evaluation recommendations from the third party evaluator, ADM. They use data collected and reported in the Program's tracking database, online application forms, Avista TRM, and RTF values to evaluate verified savings. The approach provides the strongest estimate of achieved savings practical for the program, given its delivery method, magnitude of savings, number of participants, and availability of data. The 3rd party evaluator verifies electric and gas energy savings for the Low-Income Weatherization impact evaluation, usually receiving around a 98% total realization rates.

Benton Rural Electric Assn

Benton REA is increasing the monthly bill credit for the Senior/Disability in 2024 and has created dashboards for each of our programs to conduct quarterly analysis of the effectiveness of the programs and the promotional marketing efforts. Benton REA has established a significantly higher funding target for income based efficiency programs.

Clallam County PUD No 1

Currently, the District only has a bill assistance program with effectiveness to participants in the short term. The District is opening up two new mechanisms to help those with EAN, both of which will produce sustained energy reduction. One is a low-income community solar program, designed to allow low-income customers to realize the benefits of solar generation without the large upfront cost. The second is a low-income conservation program, designed to help with affordable efficient weatherization reducing energy burden. The District will look at increasing public outreach and continue to fund infrastructure projects improving resiliency and reliability for HIC and VP.

Cowlitz PUD No 1

We are dedicated to continually review the programs to insure our processes and procedures are effective and serving vulnerable customers these programs are intended for. We will continue to increase and improve our outreach to encourage participation in these programs through events, education, advertising, etc.

In February 2024, we heard from the State Auditor's Office about the new interpretation of "low-income" and we intend to change the income eligibility requirements of this program to match that definition.

We plan to increase the selection of measures available to low-income customers through self-funding and BPA funding

We have several new outreach activities planned for the future:

-Collaboration with community-based organizations (Elder Options and Chamber of Commerce) at the Open Benefits Fair in Longview

-Organizing a new annual fundraiser golf tournament for Warm Neighbor

-Marketing and outreach to senior centers about bill assistance and weatherization

Grant County PUD No 2

Planning to change the District's Senior and Disabled discount programs to include all low-income customers. The District is researching and developing additional programs to meet the needs of Grant County's low-income population.

Grays Harbor County PUD No 1

As mentioned in the previous section, the District continues to evaluate the effectiveness of its programs mechanisms and strategies to ensure we are moving towards our CETA goals and customer's energy assistance need. We are regularly evaluating and improving our advertising frequency and methodology, reach-out strategies, and encouraging collaboration with a variety of community-based organizations to increase awareness of our available energy assistance programs.

In addition, we continue to evaluate the following approaches and focuses to increase the effectiveness of mechanisms and strategies:

1. Continued expansion and awareness of energy education and savings opportunities. As mentioned in the previous section, the District regularly participates in the Grays Harbor County Fair, Home and Garden Shows, and Ocean Shores Project Connect. In addition, the District continues to offer in-person residential energy efficiency advisement and education on the various programs available to all District customers. The District plans to broaden these efforts and to increase awareness of energy efficiency opportunities among a more diverse audience by having expanding outreach to specifically address needs of vulnerable populations in our communities.

2. Increase frequency of low-income program offerings communications. The District continues to evaluate and work towards offering additional translated print and website materials with the hope of reaching a broader audience.

3. Explore expansion and changes to low-income program offerings. The District will also continue reevaluating the programs requirements to identify the best method to expand the programs and eligibility. The District continues outreach and has conversations with community partners to further identify povish customers that have not yet been identified by current programs.

4. Expand marketing and education to vulnerable populations: Work with community partners and tribal liaisons to better identify our target audience.

PacifiCorp

PacifiCorp continue to partner with local Community Action Agencies for Low Income Bill Assistance (LIBA) program delivery.

PacifiCorp developed and published universal Low Income Bill Assistance (LIBA) program application. Application is available on PacifiCorp LIBA program web page. Customers may print, complete and submit application to local partner agency for processing.

Pacific Power developed Pacific Power service map overlaid with partner agency information to help customers identify agency partner in their specific area.

PacifiCorp started working in December 2021 with Empower Dataworks to complete an energy burden assessment to help inform future program planning, identify underserved customers as well as develop a strategy for targeting high burden customers. The study was completed at the end of June 2022 , and provided recommendations for targeting strategies for existing programs and any new programs or initiatives. PacifiCorp has focused on exploring new outreach methods as well as improving existing strategies for program accessibility to increase program participation and reduce energy burden.

Pend Oreille County PUD No 1

The PUD's current conservation program does not operate targeted low-income conservation programs, but plans to do so in the future. The PUD is looking to implement conservation programs targeted to members of low-income households. The PUD is considering partnering with Rural Resources to promote these programs.

The PUD is also implementing an advanced metering (AMI) system, which could allow the PUD to implement pre-paid accounts to benefit low-income customers.

Tacoma Power

For energy efficiency programs:

Reviewed and improved participating requirements for IQRP based on past participation and participant's comments.

Beginning in 2024, a Ductless Heat Pump Maintenance project is being implemented, targeting 600 low income customers who received grants during 2012-2017 to have DHPs installed. The goal is to identify if DHPs are still in working order and being maintained, being operated by customers as intended, or if non-operable. If repairs are needed, we plan to address those by having repairs completed.

Conduct on-site energy assessments for all income qualified program applicants to address whole home improvements, recommend upgrades, present financial incentive options, and provide support throughout installation process.

For utility bill assistance programs:

Staff continues to identify multi-family complexes that have a high population of tenants who meet the income requirements of the Bill Credit Assistance Plan. Complexes where all tenants must meet the same income eligibility of our programs, can qualify for auto-enrollment eliminating the need for customers to submit additional paperwork.

On-site enrollments are conducted by staff at apartment complexes where some tenants may be above the income eligibility of our programs. By conducting on-site enrollments, we are able to meet with customers in multi-purpose rooms where they live eliminating the need for them to travel. Whenever possible, we also team up with other programs within the City of Tacoma as well as non-profit organizations who are seeking to connect with the same client base. During these on-site enrollments we have been able to offer enrollment in utility bill assistance programs as well as provide energy/water-efficient items. Non-profit agencies often provide free cell phones and tablets for households who need them. By having other programs and services available during the same event, it reduces the stigma of the event only being available to "low income" households.

Mason PUD No 1

The District is currently working to establish a low-income energy efficiency program that would provide long-term sustained energy burden reductions with a ductless heat-pump program, as well as a low income appliance rebate program.

Utilities incrementally increasing funding or outreach

Benton County PUD No 1

As programs develop, we plan to streamline processes for our customers. An example of this is our low-income energy efficiency programs have historically required multiple contacts with our customer including initial energy audit, selection of vendor, and approval of selected measure followed by an inspection of the installed measure. Going forward we are exploring ways to reduce the need for customers to make multiple trips into the office. We are also exploring ways to prioritize customers with higher energy burden for our conservation programs.

Additionally the District receives no direct federal or state funding. However, CAC receives funds from both of these entities along with District funds which all are used to lower our low-income customers energy burden. We plan to continue to increase funding (depending on ability to spend) to CAC which leverages dollar for dollar matching funds under the Matchmaker program from state funding. These matching funds allow for greater budgets which further assists more of our customers in reducing energy burden with long term benefits.

Big Bend Electric Coop, Inc

Big Bend Electric Cooperative (BBEC) continues to assess and improve low-income programs for our members. Our low-income energy assistance program has budget increases annually to ensure the program continues to grow and expand to meet projected needs. Program participation rates and budget totals are evaluated on a quarterly basis. We are also looking at possibly adding categorical eligibility for those receiving LIHEAP funding.

BBEC plans to increase the annual household funding limit from \$200 to \$300 per eligible household beginning Jan 1, 2024, a 50% increase. This equates to a 15% annual discount based on average kilowatt hours per residence per year.

Also, we continue to evaluate marketing outreach and plan to research more targeted marketing to those living in particularly energy burdened areas. We also plan to expand bilingual marketing to spanish radio stations in the area.

BBEC will continue to have Member Service Representatives promote the program to co-op members struggling to pay their bill.

Ellensburg Energy Services Dept

Renewed agreement with community-based organization (HopeSource). Continue and enhance energy assistance programs, expand offerings for energy assistance with local public university (CWU). Consider hiring/staffing for a full-time energy assistance for low-income households department.

City of Port Angeles

Through the committee structure we feel that our program is continually improving and evolving to address the utility household burden of our citizens: 1) Meet regularly with the Port Angeles City Council representatives and non-profits to discuss ways to help low income populations, 2) Increase messaging to make the community aware of City low income programs, 3) continue to seek additional funding opportunities.

Clark County PUD No 1

In 2024, three pilot programs were approved by Clark Public Utilities Board of Commissioners with an expected program start date of October 2024. These programs are designed to meet the various requirements of the Clean Energy Transformation Act by serving customers up to 80% AMI and reducing energy burden. These pilots are intended to improve the effectiveness of energy assistance by focusing on high burden customers and simplifying the program design. Our three pilot programs will offer the following program options to low income households. (i) A Bill assistance program which will provide a month percentage based billing adjustment to help reduce the month energy burden that low income households face. (ii) An arrearage management program that will offer payment matching to help reduce a household's arrearage balance. (iii) A one time annual credit offered to customer with a low energy burden.

In 2024, Clark Public Utilities is exploring new ways to partner with organizations that already perform income qualifications at 80% AMI or 200% FPL in-house so that we may offer low income energy efficiency measures at BPA's willingness to pay. The intent is to scale up the reach of our weatherization program and reduce the energy burden of more households.

In 2023 the Clark Public Utilities team developed, and the Commissioners approved, the new community solar project that included 199 kW of installed capacity for our low-income customers. The project was designed so the solar electricity generated by the 199 kW of system capacity will be monetized using the residential rate and deposited into our Operation Warm Heart program. The community solar project has a life span of 25 years and each year the Operation Warm Heart program will receive approximately \$20,000 in new revenue from this project. This an example of an innovative approach that results in new funding for our customers in the most need of assistance, and does so over a substantial future time period.

Franklin County PUD No 1

We will work toward achieving the 2030 and 2050 goals by informing our customers of Low-Income discount offerings as well as weatherization programs to help lower their energy usage with the following methods; Communication regarding current discount offerings will be distributed to customers by our reader board, social media, newsletter and attending events such as a Senior Expo's locally to help spread the word to Seniors who might qualify for our Low-Income discount program. The Helping Hands program was increased from an assistance of \$100 to \$200 per application starting 1/1/2024 and income criteria was changed to match WAC 194-40-030 definition of low income was changed in 4/1/2024. The Helping Hands program is funded from customer donations, so we will push for helping hands donations through our social media accounts and our online bill pay platform SmartHub seasonally. We will continue to improve outreach to customers regarding energy assistance opportunities as they become available. We also plan to make a one page quick reference of available assistance programs in English and Spanish to distribute at community events that are attended in hopes that more customers will be reached and become aware of programs that are available to them for energy assistance.

Inland Power & Light Company

Inland Power plans to enhance the program through additional advertising, identifying additional members, increasing offerings past insulation and direct bill assistance and increasing available funds.

Jefferson County PUD No 1

JPUD'S plans to improve long term assistance measures include the use of funding through the Rural Development, Rural Energy Savings Program (RESP) and through potential grant funding. Short term assistance measures for Jefferson County PUD were assessed by a third party who identified the assistance need and measures that could be taken to meet that need, while ensuring that the households with the greatest need are prioritized in funding.

Lewis County PUD No 1

We will continue to offer our low-income energy efficiency program focused on providing ductless heat pumps and weatherization. If we are unable to secure any more funds in 2024 from the TransAlta Coal Transitions Board, we will continue to offer our low-income energy efficiency program through our BPA energy efficiency incentives (EEI) while exploring any additional grant funding opportunities. We plan to evaluate the amount of BPA EEI funds that are spent on low-income vs non-low-income, commercial, and industrial customers and make changes as needed to make progress towards the energy assistance need.

We plan to help reduce the language barrier even more by making our low-income energy efficiency program application available in Spanish. We have received numerous requests from organizations (senior centers, non-profits, etc.) to present information to the community about our programs and will participate in those events as much as possible to increase awareness of our programs as these organizations may have more access to underserved or vulnerable populations.

We also plan to continue our collaboration with Community Action Council to provide low-income bill assistance and to continue to offer funding for these programs. The amount of funding and the source of the funding for these programs will be assessed as we evaluate how we plan to meet the energy assistance need.

Modern Electric Water Company

Modern is committed to enhancing the effectiveness of our mechanisms and strategies to meet the energy assistance needs of our community. To achieve this goal, we are dedicated to improving accessibility and

awareness of our energy assistance programs. This involves continuing to maintain a streamlined application process, implementing outreach campaigns, and enhance communication channels to ensure that eligible customers are informed about the support available to them. We also aim to identify trends and patterns in customer usage and payment behavior, allowing us to target assistance resources more effectively and efficiently. Continued collaboration with community partners is another key aspect of our plan. We work closely with local organizations, social service agencies, and other stakeholders to leverage their networks and resources in reaching underserved populations and maximizing the impact of our assistance programs. Overall, our plan reflects our unwavering dedication to meeting the energy assistance needs of our community in the most effective and impactful way possible. Through collaboration, innovation, and a commitment to continuous improvement, we are confident that we can continue to make a meaningful difference in the lives of those we serve.

Orcas Power & Light Coop

As described previously, the utility plans to piggyback on planned community solar projects to direct grant funds garnered through those projects into the energy assistance programs. The goal is to use these grant funds to spread the benefits of solar to low-income members while increasing the energy assistance capacity to meet the rising cost of power due to decarbonization.

Peninsula Light Company

In January 2024, Peninsula Light Co. increased the Project Help billing assistance amount per household by 25%. Additionally, PLC is planning to divert more funding toward low-income ductless heat pumps by partnering with a local community agency. PLC is currently evaluating effectiveness of programs, mechanisms, and strategies to help inform how to best meet our members needs for energy assistance responsibly and within our mission of being a non-profit consumer owned utility while keeping the lowest rates possible. PLC will continue to strive to keep member rates affordable with responsible fiscal management; this is an important method to keep members' energy burden as low as practically possible while providing reliable, safe, and clean electricity to satisfy the human demand for continually improving their quality of life.

Utilities evaluating what to do

Chelan County PUD No 1

Annual review of current low-income programs, identify any gaps, and determine means of fixing those gaps. Working towards developing a District-wide low-income strategy to better guide overall implementation.

Chewelah Light Department

We are in the process of creating a data base of low income qualifying households which will give us an idea of what the need is. We are working with a private consultant who specializes in low income weatherization. We are working with a company called Promise to help establish a qualifying household data base. We are working with BPA to further our grant money to help more households. All of these are recent 2024 developments. We received 1 million in grant funds for the HEAR program, that money is being used for no cost heat pumps for the low income, prioritizing high energy burden. We also 60,000 in funds for the Washington Families Clean Energy Credits. This does not prioritize high energy burden. With only 1250 residential customers we will be able to reach a great percentage of our most needy.

Douglas County PUD No 1

We continue to evaluate how to reach our burdened customers. This has been difficult, as with our low rates, many of our low income customers are not considered burdened.

Klickitat County PUD No 1

KPUD's strategy for evaluating our programs for CETA compliance involves partnering with consultants to identify realistic and cost-effective solutions. This includes: - Identifying the energy burden within our service territory. - Evaluating current programs and initiatives. - Establishing collection requirements and tracking metrics. - Implementing digital solutions, including website, social media, and marketing. - Expanding our portfolio of energy assistance, energy efficiency, and demand response programs. - Addressing the needs and service gaps for low-income households to promote energy equity. The overarching goal is to generate a comprehensive energy needs assessment to ensure legislative compliance. We are also researching the addition of a low income solar project program, through WSU grant funding. We also anticipate that with the additional data from our new AMI meters we will be able to enhance reporting and analysis, informed by our energy needs assessment for vulnerable populations, we will further refine our strategies for energy conservation and assistance.

Ohop Mutual Light Co.

We are exploring a variety of options to increase energy assistance from simply increasing marketing of existing programs (Senior Discount & Operation Round Up) to adding additional programs such as conservation rebates specifically for low income customers and the possible addition of community solar for low income families.

Pacific County PUD No 2

As metering technology allows, we are contemplating pre-pay, a pay as you go alternative to the traditional model for buying electricity. It allows customers to pay what they want, when they want and would eliminate late fees and upfront deposits.

Richland Energy Services

We are currently researching the best approach and revising the policy to expand our low-income program, so that it serves all low-income customers under the CETA definition.

Seattle City Light

Seattle City Light has retained an external consultant to conduct an evaluation of the utility assistance programs across Seattle City Light and Seattle Public Utilities. The final report and accompanying recommendations are scheduled to be complete in Quarter 2 of 2024. It is anticipated that the evaluation results will point to programmatic changes large and small that will reduce barriers of access to programs and prompt program design and implementation.

Snohomish County PUD No 1

i. After learning from the State Auditor Office in February 2024 about the latest guidelines for assessing income eligibility, we are exploring which programs can be expanded to serve all low-income customers under the CETA definition

ii. We are in the process of digitizing our application workflows to streamline the application processes and reduce barriers for customers

iii. We intend to use the data and results from our energy burden assessment to strategize about marketing and program design

iv. We are planning online surveys for program participants to get qualitative feedback on our programs.

Steilacoom Public Works

Town officials are currently assessing whether to expand the utility assistance program to incorporate Section 120 specific criteria to the qualifying criteria for the program and what that would look like (automatic qualification for a certain dollar amount and assess from there, etc). Town officials are also investigating expanding our BPA appliance program to possibly incorporate a Town-funded incentive for individuals/families meeting the Section 120 specific criteria. Both of these decisions should be made and if approved incorporated into the program in mid to late calendar year 2024.

Utilities planning to maintain programs

Centralia City Light

No changes needed based on current interview procedures, Community Action Council partnership, and numbers of customers participating.

City of Cheney Light Dept

Door to door visits to large apartment complexes in order to grow the program. Will continue to advertise the availability of the Cheney Outreach program.

Elmhurst Mutual Power & Light Co

We will continue to administer our Shine a Light funds and work to ensure customers who need access to the funds have them.

Ferry County PUD No 1

All of the communities within Ferry County PUD's service area are Highly Impacted Communities. The Utility's Board of Commissioners, after consideration, believes that the amount required for this assistance is excessively burdensome on its ratepayers and is advocating for a state administered and funded energy assistance program. If this does not happen, funds from the sales of the no-cost allowances allocated to the Utility under the Climate Commitment Act will be used for energy assistance.

Kittitas County PUD No 1

We will continue to work at educating customers about programs available and encouraging them to apply through HopeSource.

Okanogan PUD No 1

The District's assessment includes a plan to continue making available the programs submitted in this report, for low-income assistance to our customers. The plan to improve the effectiveness of the mechanisms and strategies toward meeting the energy assistance need, is to wait for the State of Washington to determine what is a necessary statewide monthly energy bill assistance program.

Current programs the District makes available and encourages, including LIHEAP, Salvation Army, Low-income Energy Efficiency, Project Help, and others, are currently operating effectively for reducing both short- and long-term energy burdens.

Parkland Light & Water Company

We will continue to seek programs to help reduce long-term energy burdens that can be implemented in the future.

Tanner Electric Coop

Make sure anyone in need has access to funds provided through Salvation Army and continue to provide payment plans and budget billing.

Town of Eatonville

The Town of Eatonville does not have an in-house energy assistance program. We have vendor agreements with outside agencies to offer assistance to our customers. We are a small agency and have not created and funded a program.

Create their first program

City of Sumas

The City of Sumas, has met with the State Auditor's Office as well as the Department of Commerce to better understand the requirements and the intentions of CETA. At this point the City of Sumas and the City's Finance Committee has met a couple of times to determine how to best provide and implement low-income programs. By the end of 2024 we hope to have at least two new low-income programs that fully comply with the CETA requirements.

No plan was submitted

City of Coulee Dam

No plan was submitted with the utility's report.

Lakeview Light & Power

No plan was submitted with the utility's report.

Nespelem Valley Electric Coop

No plan was submitted with the utility's report.

Skamania County PUD No 1

No plan was submitted with the utility's report.

Wahkiakum County PUD No 1

No plan was submitted with the utility's report.

Has no residential customers

Asotin County PUD No 1

Whatcom County PUD No 1

Organized under Idaho law

Northern Lights Incorporated

Kootenai Electric Cooperative

Clearwater Power Company

Appendix F: Energy burden data

Sec. 120 requires Commerce to estimate the energy burden, energy assistance need, and reported energy assistance for each electric utility. The Legislature requires Commerce do this to improve agency and utility efforts to serve low-income households. Utilities must disclose information to Commerce to assist it in its data collection efforts.

Utilities have not historically kept income and other demographic information about their customers, and most utilities did not develop the data needed to meet Commerce's statutory reporting requirements. With the advice of its Energy Assistance Advisory Group, Commerce used the Department of Energy's Low-Income Energy Affordability Data (LEAD) Tool. A summary of its strengths and weaknesses is provided in [Appendix A](#).

It is important to note that the DOE LEAD Tool is not a precise instrument; it provides an estimate of energy assistance need. The LEAD tool is produced by the U.S. Department of Energy (DOE) and the National Renewable Energy Lab (NREL) to provide national, state, and local energy burden. It is the only statewide resource for understanding energy burden and assistance need in Washington.

The estimates of energy burden and energy assistance need in the DOE LEAD Tool are based on household responses to questions about their actual energy costs. The numbers are then calibrated by NREL to ensure outliers. Therefore, energy burden and assistance need amounts reflect the extent to which Washington's electricity rates are lower than electricity rates in some other states, and bill reductions from assistance programs the household was receiving around the time of the survey.

The DOE LEAD Tool was last updated in 2024 with American Community Survey 5-year estimates for 2018-2022. A full description of the DOE LEAD Tool and a summary of its strengths and weaknesses is in [Appendix B: RCW 19.405.120 \(Sec. 120\) analysis](#).

County	Number of energy burdened low-income households	Percent of low-income households that are energy burdened	Percent of energy burdened low-income households of total population	Average energy burden for energy burdened low-income household	Total excess burden of energy low-income households
Adams	896	33%	14%	\$998	\$893,607
Asotin	1,581	40%	17%	\$963	\$1,522,072
Benton	5,609	22%	7%	\$866	\$4,854,892
Chelan	1,069	10%	4%	\$415	\$443,673
Clallam	5,422	41%	16%	\$989	\$5,359,706
Clark	12,903	18%	7%	\$741	\$9,562,209
Columbia	405	60%	22%	\$1,195	\$484,052

County	Number of energy burdened low-income households	Percent of low-income households that are energy burdened	Percent of energy burdened low-income households of total population	Average energy burden for energy burdened low-income household	Total excess burden of energy low-income households
Cowlitz	4,139	25%	10%	\$811	\$3,357,312
Douglas	579	12%	4%	\$562	\$325,358
Ferry	1,243	81%	41%	\$1,354	\$1,683,084
Franklin	2,433	23%	9%	\$880	\$2,140,430
Garfield	271	60%	27%	\$1,559	\$422,967
Grant	2,955	21%	9%	\$705	\$2,083,758
Grays Harbor	5,837	46%	20%	\$1,064	\$6,211,221
Island	4,729	40%	13%	\$1,075	\$5,081,798
Jefferson	3,323	53%	21%	\$1,251	\$4,157,131
King	53,220	17%	6%	\$1,188	\$63,225,460
Kitsap	10,124	27%	10%	\$1,264	\$12,791,480
Kittitas	3,286	40%	17%	\$1,079	\$3,545,054
Klickitat	2,058	56%	21%	\$1,049	\$2,159,310
Lewis	5,474	44%	17%	\$853	\$4,668,437
Lincoln	838	49%	18%	\$1,184	\$991,923
Mason	4,056	47%	16%	\$1,189	\$4,822,050
Okanogan	5,609	73%	33%	\$1,171	\$6,566,812
Pacific	1,569	34%	15%	\$1,122	\$1,760,451
Pend Oreille	1,231	51%	21%	\$1,211	\$1,490,330

County	Number of energy burdened low-income households	Percent of low-income households that are energy burdened	Percent of energy burdened low-income households of total population	Average energy burden for energy burdened low-income household	Total excess burden of energy low-income households
Pierce	26,769	22%	8%	\$985	\$26,361,306
San Juan	2,008	64%	23%	\$1,561	\$3,133,877
Skagit	6,726	38%	13%	\$1,032	\$6,941,844
Skamania	1,449	70%	30%	\$1,332	\$1,930,498
Snohomish	20,241	18%	7%	\$873	\$17,663,347
Spokane	27,502	33%	13%	\$807	\$22,189,622
Stevens	4,123	54%	22%	\$1,276	\$5,261,346
Thurston	11,587	27%	10%	\$999	\$11,572,296
Wahkiakum	490	56%	25%	\$1,433	\$702,541
Walla Walla	3,001	33%	13%	\$1,034	\$3,103,309
Whatcom	10,432	30%	11%	\$1,125	\$11,736,144
Whitman	3,926	43%	22%	\$551	\$2,162,197
Yakima	11,804	32%	14%	\$1,009	\$11,904,709

Source: Commerce calculations using U.S. Department of Energy Low-income Energy Assistance Data [WA DOE LEAD Tool Data | Powered by Box](#)

Other low-income energy assistance programs

Low-Income Home Energy Assistance Program

The Low-Income Home Energy Assistance Program (LIHEAP) is a federal energy assistance program administered by Commerce. The program funds community organizations to help households with energy bills, health and safety improvements, and weatherization and minor home repairs. LIHEAP provided \$62 million in benefits in 2023. With one-time Climate Commitment Act funding, Commerce expanded LIHEAP to include additional money for energy bill assistance and weatherization for households up to 80% of area median income.

Heat and Eat Program

Washington Combined Application and the Food Assistance Program for Legal Immigrants provides up to \$20.01 in LIHEAP benefits for 12 months. It provided \$4.6 million in total benefits to households in 2023.

Donations

Electric utilities collect and apply donations to customer accounts as a form of direct bill assistance. Donations are insufficient to meet energy assistance need and are an unreliable source of funds for households. Utilities and advocates disagree over whether donation programs can be counted under Sec. 120 requirements. Electric utilities provided \$2.7 million in bill reductions from donations in 2023.

Natural gas utility programs

Natural gas companies also provide energy assistance programs. The only investor-owned gas companies, Northwest Natural Gas and Cascade Natural Gas, are regulated by the UTC and offer direct bill assistance. The City of Enumclaw and City of Ellensburg distribute natural gas, but are not regulated by the UTC. Their programs are more limited. These programs provided roughly \$1.7 million in the 2023 program year, from October 2023 to November 2024.

Washington Matchmaker Program

The Legislature created the Matchmaker Program in 1987 to provide matching funds for weatherization investments made by utility and property owners. The Legislature has funded the program each biennium since 1991. The program expanded to include healthy home measures in 2015. Matchmaker expenditures on weatherization amounted to \$10 million in fiscal year 2023.

Department of Energy (DOE) Low-Income Weatherization Funding

DOE provides funding for weatherization formula grants and the Bipartisan Infrastructure Law. This funding sources amounted to \$7.4 million in fiscal year 2023.

Bonneville Power Administration Low-Income Energy Efficiency Program

The Bonneville Power Administration's Low-Income Energy Efficiency (LIEE) program benefits qualifying low-income residents by funding the installation of energy efficiency measures in their homes at no cost. These expenditures amounted to \$1.5 million in fiscal year 2023.

Case study: Pierce County

Pierce County provides a microcosm of the state when it comes to monthly low-income energy assistance programs. There are 12 utilities in the county. Only one, Puget Sound Energy, Inc. (PSE), offers a monthly low-income energy bill assistance open to all low-income households as defined under state law and administrative rule. Other utilities run limited donation programs, restrict eligibility to only certain persons (such as seniors and disabled), or adopt income eligibility criteria that fall below state law and administrative rule. The differences in composition of these utilities and the laws that apply to them are discussed in greater detail in the next section of this report.

Because of this patchwork of programs, low-income households in Pierce County have vastly different experiences accessing energy bill assistance based solely on where they happen to live. Many live in utility service territories that do not offer a monthly bill assistance program. Their experiences highlight the challenges of fragmented programs, broken communication processes, and low program participation rates felt elsewhere throughout the state.

Pierce County overview

Utilities	Energy services	Approx. service territory (in Pierce County)	Approx. number of residential customers (thousands)	Number of low-income bill assistance programs, including donations	Number of low-income bill assistance programs w/o donations	Number of low-income energy bill assistance programs w/o non-income eligibility restrictions	Number of low-income energy bill assistance programs that match state law and administrative rule	Number of low-income monthly energy bill assistance programs that match state law and administrative rule
Tacoma Power	Electricity	Tacoma	183	2	2	1	0	0
Peninsula Light Company	Electricity	Western Pierce County, including University Place	30	3	2	0	0	0
Puget Sound Energy, Inc.	Electricity, natural gas	Northwestern parts of Tacoma, including Puyallup and Tacoma	118 (electric customers) 159 (gas customers)	3	2	2	1	1
Lakeview Light and Power	Electricity	Greater Lakewood area, including south Tacoma and city of Lakewood	3	1	0	0	0	0
Ohop Mutual Light Co.	Electricity	Rural parts of Pierce County	5	2	1	0	0	0
Town of Eatonville	Electricity	Eatonville	1	0	0	0	0	0
Parkland Light & Water Co	Electricity	Parkland	4	1	0	0	0	0
Elmhurst Mutual Power & Light Co	Electricity	Greater areas around central Pierce County, including Spanaway	15	1	0	0	0	0
Steilacoom Public Works	Electricity	City of Steilacoom	3	1	1	0	0	0
Town of Ruston Utility Dept.	Electricity	Town of Ruston	0.6	0	0	0	0	0
City of Milton	Electricity	City of Milton	4	1	1	0	0	0

Utilities	Energy services	Approx. service territory (in Pierce County)	Approx. number of residential customers (thousands)	Number of low-income bill assistance programs, including donations	Number of low-income bill assistance programs w/o donations	Number of low-income energy bill assistance programs w/o non-income eligibility restrictions	Number of low-income energy bill assistance programs that match state law and administrative rule	Number of low-income monthly energy bill assistance programs that match state law and administrative rule
Tanner Electric Cooperative	Electricity	Anderson Island	0.8	1	0	0	0	0