Draft Summary of Utility Plans under Sec. 120

August 29, 2022

Document Overview and Review Deadline

This draft document is a compilation of electric utility plans to improve the effectiveness of their energy assistance programs, and outreach and enrollment strategies, toward meeting the energy assistance need of their customers.[[1]](#footnote-1) Responses were compiled and categorized by the Washington State Dept. of Commerce.

If you believe Commerce has incorrectly categorized or summarized utility plans submitted as part of their assessments under RCW 19.405.120(4)(iii), please submit your suggested revision by Sept. 16, 2022, to Austin Scharff (Austin.scharff@commerce.wa.gov).

Summary Compilation

Investor-owned utilities

Broad and deep reforms under RCW 80.28.068

**Avista**

Avista is modifying its LIRAP program from a grant-based benefit to a discount based program in line with RCW 80.28.068. It is also expanding its income thresholds to align with Sec. 120. The bill discount will be based on the participant's income level. Avista will serve as a joint administrator of the program and rely on limited documentation and self-attestation to verify eligibility for the program. Avista is in the process of designing targeted conservation programs that will be offered to low-income households and highly impacted communities.[[2]](#footnote-2) Avista intends to use 2022 to develop program design concepts and outreach strategies. It aims to roll out new conservation programs in 2023.

**PacifiCorp**

PacifiCorp is expanding the income thresholds for its programs and changing the method of calculating its discount credit for monthly usage in excess of 600 KWh to a straight percentage discount of the net monthly bill. It eliminated an annual cap on its programs, which will open enrollment to all low-income households. PacifiCorp has also proposed revisions to its Weatherization program, including an increase of funds available for repairs from 15% to 30% of annual eligible measure cost. The program will also permit installation of electric heat to replace permanently installed electric heat, space heaters, or any fuel source except natural gas with adequate combustion air. The changes are designed to promote the installation of electric heat and minimize wood heat, solid fuel, or natural draft equipment where combustion safety and air quality cannot be maintained.

**Puget Sound Energy (PSE)**

PSE is proposing a new low-income bill discount rate program pursuant to RCW 80.28.068. The program has been designed to significantly reduce the monthly PSE bill for customers who have the highest energy burdens. PSE is also proposing an arrearage management program which will forgive 1/12 of the customer arrearage with each on-time monthly payment, effectively paying off any past due balance after one year of on time payments. PSE has proposed the creation of an income validation process for its bill discount rate and PSE HELP. The new process relies on limited documentation and customer self-attestation. It is updating its web translation services to support more languages, and is leveraging findings from its Low Income Needs Assessment and Dept. of Health's cumulative impact assessment to inform program design and customer engagement. PSE has prioritized short-term reductions in energy burden through the pandemic. The company hopes to begin prioritizing both short-term and long-term programs.

Public Utility Districts (PUDs)

PUDs setting up their first low-income programs

**Kittitas County PUD No 1**

Kittitas County PUD No 1 added a bill discount program for its low-income customers to comply with Sec. 120. Kittitas County PUD No 1 plans to gather information about low-income households in its service area and identify the actual energy assistance need, so it can adapt its program offerings to meet Sec. 120’s 2030 and 2050 targets.

PUDs tweaking or redesigning their programs

**Chelan County PUD No 1**

Chelan County PUD No 1 invested in creating an energy burden mapping tool and plans to use it to target energy efficiency services to areas of Chelan County where there are a larger percentage of customers who have high energy burden. The County sent a gift box with showerheads and lights and provided an option to receive a thermostat as well. Households will also be able to submit a self-addressed card back to the utility letting it know they want to participate in other offerings through this program. The PUD intends to follow up with more costly items like weatherization (windows, air sealing and insulation), appliances and water heater improvements. The PUD intends to not require income requirements for this program, but rather spot check through a QA/QC process internally. This should help the ease entry into the program.

**Clallam County PUD No 1**

 Clallam County PUD No 1 stated it restructured its existing program to align with the goals and initiatives listed within Sec. 120 of CETA. Clallam County PUD No 1 is funding a new program with more than $350,000 or 115% of the 2018 funding assistance level. Clallam County PUD No 1 has allocated most of its funding for direct financial assistance as a way to reach the most amount of customers with the funding available.

**Clark County PUD No 1**

Clark County PUD No 1 reported that it was launching a new Clark Public Utilities COVID Relief program targeted at low-income customers in the fourth quarter of 2021. The program will be available to residential households with a total household income that does not exceed 225% of the federal poverty level. It intends to offer a bill credit of up to $750 (not to exceed the past due balance) to address the past due balance on the account that is over a month past due. Customers can receive a payment matching benefit of up to $500, based on eligible past due balance, after the CPR bill credit is posted. Utility staff continue to develop targeted conservation programs and aim to implement a new program in 2023.

**Cowlitz County PUD No 1**

Cowlitz County PUD No 1 is assessing its low-income discount rate programs using updated customer demographic data to ensure eligibility requirements, income limits, and discount rates are applicable to vulnerable populations and highly impacted communities with high energy burden. It is also making program adjustments in response economic pressures, customer access constraints and identified gaps for customers with high energy burden that are ineligible for other energy assistance resources. Cowlitz County PUD No 1 intends to track the effectiveness of its programs over the long-term and establish a ductless heat pump and heat pump water heater incentive and installation program with targeted promotion to tenant households in high energy burden census tracts.

**Douglas County PUD No 1**

Douglas County PUD No 1 is considering the feasibility and need for direct assistance programs for its low-income customers. It contracted with a consultant to design its own tools to calculate energy burden. It found that high conservation potential customers make up most of its high energy burdened customers. The utility intends to emphasize conservation rather than direct discounts or grants, and increase outreach to vulnerable and high-burden customers. It intends to eliminate its matchmaker weatherization program, and in 2022, will be designing programs and allocating funds that are needed to meet our energy efficiency and energy assistance targets.

**Mason PUD No 3**

In 2022, Mason PUD No 3 is considering the feasibility and need for assistance program designs for customers up to 80% AMI. It is going use an energy burden dashboard developed by a consultant to identify vulnerable populations for more targeted outreach. In addition, it will partner with its community action council to offer low income residential energy efficiency programs and assistance. The utility intends to make sure its programs are compatible with its CEIP.

**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. The PUD’s current conservation program does not target low-income households, but plans to do so in the future. It will target members of the Kalispel Tribe of Indians, low-income households, and seniors living in poverty. The PUD plans to work with landlords and multi-family housing owners on potential conservation measures. The PUD is considering partnering with Rural Resources to promote these programs.

Pend Oreille County PUD No 1 also reported that it plans to self-fund targeted low-income energy efficiency programs, but hopes that it will have a BPA Energy Efficiency allocation in the near future. It would like to allocate a portion of those funds towards low-income targeted energy efficiency. While the PUD has relied on BPA conservation funding in the past to operate energy efficiency programs, due to the loss of its largest industrial customer in 2020, the PUD has not received additional funding since that time. A future BPA budget will be critical to the success of lowering customer’s energy burden and addressing energy assistance need. Last, the PUD is exploring the implementation of an advanced metering (AMI) system, which could allow the PUD to implement pre-paid accounts and time-of-use rates to benefit low-income customers.

**Skamania County PUD No 1**

Skamania County PUD contracted with a consultant in 2021 to estimate program funding targets and goals to comply with [RCW 19.405.120(4)(a)(iii)](https://app.leg.wa.gov/RCW/default.aspx?cite=19.405.120). A mix of short-term (low-income energy assistance) and long-term (conservation, energy efficiency) programs will be explored and expanded to demonstrate progress. The utility is scheduled to implement energy assistance surcharges beginning in 2023 on billing statements. These funds will be restricted to energy assistance programs. Increased efforts to receive donations for high burden energy customers will continue.

**Snohomish County PUD No 1**

Snohomish PUD is currently planning to streamline enrollment for its income qualified discount program. Snohomish plans to add to its partnerships LIHEAP and DSHS to include a partnership with IQA in health care to limit redundancies and reach all areas across the utility's service area.

PUDs expanding their programs or outreach

**Grays Harbor County PUD No 1**

Grays Harbor County PUD No 1 plans to broaden its energy education programs to vulnerable populations and translate its materials with the hope of reaching a broader audience. The PUD will also continue to maintain its programs and specific actions taken in its clean energy implementation plan.

**Benton County PUD No 1**

Benton County PUD No 1 plans to continue to provide its short-term billing assistance programs and expects a temporary increase in those customers from the COVID-19 pandemic. It hopes to use this temporary increase in enrollment to sign up more customers for other ongoing energy efficiency programs. Benton County PUD No 1 long-term energy efficiency program funding and participation levels are planned to increase incrementally over the years targeting more low-income customers to further reduce energy burden. The utility is working with its Community Action Council to provide additional funding and increase its low-income energy efficiency program.

**Franklin County PUD No 1**

Franklin County PUD No 1 focused on residential insulation in its service territory. It added a Spanish speaking specialist to help explain the program and process to customers. Franklin County PUD No 1 employees met with customers and walked them through its low-income program. Franklin County PUD No 1 has also promoted its low-income to multifamily housing allowing landlords to take advantage of the program, which ultimately benefits our customers. Franklin County PUD’s main funding for its conservation program is through the Bonneville Power Administration. Utility funding is also budgeted and utilized to ensure as many customers as possible can utilize the program.

PUDs maintaining programs

**Grant County PUD No 2**

Grant County PUD No 2 intends to continue its Home Energy Assessments. Each audit will consist of a survey, energy inspection, energy saving recommendations, tips on ways to save energy, information on assistance programs, direct install of LED light bulbs, weather stripping replacement, blower door and duct testing, if applicable. The PUD will work with contractors for upgrades such as insulation, duct sealing and thermostat replacement.

**Lewis County PUD No 1**

Lewis County PUD intends to maintain its existing programs, work with third party agencies, and explore grant funding opportunities to assist low-income customers.

**Mason PUD No 1**

Mason PUD No 1 reported that it does not have capacity to fund a low-income energy assistance program on its own without significantly raising rates.

PUDs evaluating what to do

**Ferry County PUD No 1**

Ferry County PUD No 1 reported that its service area consists entirely of highly impacted communities containing diverse vulnerable populations. It said that subsidizing the energy burden of any vulnerable population within our service area, will inevitably shift that burden to other vulnerable populations. Before implementing any additional, rate funded assistance programs, the Districts Commissioners have requested that a survey of our customers be conducted to help determine their energy burdens, and better define the need for assistance.

**Jefferson County PUD No 1**

Jefferson County PUD No 1 is working with consultants to study the current low-income rate discount program and determine paths forward to improve the program. The utility has discussed increasing the income guidelines for qualification, increasing its flat rate discount or moving to a percentage discount, energy efficiency measures, energy audits, and customer education.

**Klickitat County PUD No 1**

Klickitat County PUD No 1 is currently working to complete an Energy Assistance Need (EAN) assessment. The assessment should include a plan to improve effectiveness of its assessed mechanisms, strategies and obstacles, program offerings, rate and fee considerations, community partnerships, staffing level needs, and vulnerable population needs.

**Pacific County PUD No 2**

Pacific County PUD No 2 is conducting an Energy Assistance Need (EAN) assessment. The district will undertake planning and implement policies after doing a more in-depth analysis into how energy assistance need can be met while maintaining low electricity rates.

Municipalities

Municipalities setting up their first low-income programs

**City of Chewelah**

Chewelah’s program began in July 2021. It is using Rural Resources to determine household eligibility and distribute funds. Rural Resources will provide demographic information and overall need as the program progresses. It will start collecting data about its vulnerable populations. Its programs have been focused on avoiding shutoffs.

Large municipal utilities redesigning programs

**Seattle City Light**

Seattle City Light is liberalizing the municipal code governing debt forgiveness terms to address a growing need for arrearage forgiveness. It is investing in an enterprise content management system to bring together previously siloed programs into a “one-stop shop” for customers. The system will also serve its utility discount program, providing an ongoing 60% reduction in electric bills to our income-qualified customers. Looking forward, it will examine retooling of our Powerful Neighborhoods program to capture new conservation opportunities for our income-qualified customers.

**Tacoma Power**

Customer Service/Customer Solutions Assistance: Targeting approximately $2,775,660/year in continued and expanded Power Low-Income Elderly (LIE) discount rate enrollment; Bill Credit Assistance Plan (BCAP) and Low-Income Assistance Donation (LIAD) programs. Lobby open since late July, 2021 for customer payment assistance and scheduling.

Once the TPU disconnect moratorium is ended (March 31, 2022) automatically sign up Power customers in arrearage for 24 month payment plan. Continue to urge customers to take advantage of available federal funding.

Power Customer Energy Programs are targeting approximately $780,965/yr. in qualifying low-income Power customer conservation programs, marketing & outreach and administration. As of August 2021, qualifying low-income customer income levels are now up to 80% Area Median Income or 200% Federal Poverty level. The following programs are currently implemented or planned for 2022/2023.

Rebates/Grants for HVAC (Central and Ductless Heat Pumps), Attic, Floor and Wall insulation, Window replacement; Duct sealing and line-voltage/smart thermostats, hybrid water heaters for both Owner Occupied and Rentals. We will be offering 100% grant for insulation measures for qualifying rental properties. We are evaluating up to 100% grants for HVAC and single-pane window replacement for qualifying rental properties.

Deferred zero-interest loans for qualifying customers and loan repayment not due until the home is no longer occupied by the customer or their spouse. We are adding central heat pumps and raising loan cap rates for HVAC, Insulation, Hybrid water heaters and Window replacement to eliminate any income-qualifying customer out of pocket expenses. A real estate lien is used to secure the loan and customers have the option of loan pay off at any time during the life of the loan.

Behavior-Savings program will be initiated in late 2022 to help customers understand their energy use and learn about opportunities to save energy for up to 70,000 customers. Customers will receive quarterly Home Energy Reports (HERS). A portion of the participants will be qualifying low-income customers in targeted census tracts.

Partnership programs continue with two CAP agencies: Metropolitan Development Corporation (MDC) and Pierce County Health Department along with non-profit Re-Build South Sound to engage in qualifying low-income whole home energy retrofits involving HVAC, insulation, hybrid water heaters, thermostats and window replacement rebates will continue.

Custom Projects for single-family and multifamily customers will be identified and pursued where possible to assist reduce energy burden.

Home Energy Audits reinstating virtual and eventually on-site energy audits for all customers, including those living in rentals, with a focus on income qualified customers. Income qualified tenants will receive a leave-behind EE kit.

**City of Richland**

Staff conducted an energy burden assessment and found that the utility needs a holistic approach that combines conservation and direct assistance will be needed. The city plans to explore options to update or redesign its Low Income Senior Citizens and Disabled Discount.

Small municipalities maintaining programs

The City of Centralia did not make any changes to its programs. City of Cheney said it would maintain its existing programs and had limited funds to create new programs. Port Angeles and City of McCleary plan to maintain their programs. City of Sumas and Coulee Dam did not mention anything.

Cooperatives

Coops starting their first direct bill assistance programs for low-income households

Big Bend Electric Coop, Benton Rural Electric Association, Columbia Rural Electric Association, and Okanogan Electric Cooperative are all focused on establishing programs.

Other coops maintaining existing programs

Orcas Power and Light plans to maintain its existing programs and will ask for more donations if it needs more funds. Elmhurst Mutual and Tanner Electric Cooperative plan donate to Salvation Army. Peninsula Light is figuring out how to prioritize energy burden reductions. Lakeview Light did not provide a response.

Coops considering expanding programs

Vera Power and Water is exploring adding energy efficiency programs and working with a third party program to scope a program and better understand the financial and socio-economic needs of its customers.

1. [RCW 19.405.120: Energy assistance for low-income households. (wa.gov)](https://app.leg.wa.gov/RCW/default.aspx?cite=19.405.120) [↑](#footnote-ref-1)
2. 2022-2023 Biennial Conservation Plan (see Docket Nos. UE-210826 and UG-210827) [↑](#footnote-ref-2)