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March 12, 2024

**VIA ELECTRONIC FILING**

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**Re: UM 2211 and UE 426 – Idaho Power’s Bill Discount Program Roadmap**

Idaho Power Company (“Idaho Power” or “Company”) respectfully submits this Bill Discount Program Roadmap (“Roadmap”) in response to discussion that occurred during the Oregon Public Utility Commission (“Commission”) Commissioner’s Workshop, held on March 5, 2024.

The Roadmap is organized as follows:

- **Background:** Overview and context regarding the development of Idaho Power’s interim program.
- **UM 2211 Timeline:** Key milestones and activities associated with Idaho Power’s work towards implementation of an interim program, which includes a summary of Idaho Power’s program proposals, stakeholder feedback received, and attachments of all public meeting presentations.
- **UE 426 Summary:** References to testimony and exhibit page numbers where Idaho Power’s proposed Schedule 63, Bill Discount for Qualified Customers (“Schedule 63” or “Bill Discount Program”) and Schedule 64, Bill Discount for Qualified Customer’s Cost Recovery Mechanism (“Schedule 64”) can be found.
- **UE 426 Discovery:** A summary of discovery related to the Bill Discount Program provided to-date in UE 426, which is included as an attachment to this document.

**BACKGROUND**

On January 1, 2022, House Bill 2475, the Energy Affordability Act (“HB 2475”) was enacted through ORS 757.230, which broadened the Commission’s authority to consider differential energy burdens on low-income customers and other economic, social equity or environmental justice factors that affect affordability for certain classes of utility customers. The Commission opened UM 2211 – HB 2475 Implementation of Differential Rates and Programs in Oregon – to provide a vehicle for Staff to work with environmental justice and community

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advocates and utilities in implementing the Commission's new authority. After considering feedback from key stakeholders, the Staff proposed a process for electric utilities to submit "interim differential rates or programs for implementation by Q2 2022."<sup>1</sup> At that time, Staff also laid out a proposed baseline evaluation criteria for interim rates or programs and sought feedback from impacted stakeholders.

Around the time of Staff's initial update, Idaho Power and Staff held an informal meeting on December 21, 2021, where Idaho Power expressed concerns about how – given the unique economics and small customer base within its Oregon service area – a quickly implemented interim program in its service area may create unintended consequences that could be mitigated through a more comprehensive evaluation of the impact to the broader residential class. Following that discussion, the Company submitted comments summarizing its concerns in the docket.<sup>2</sup>

On January 31, 2022, Staff issued a memo in UM 2211<sup>3</sup> containing its final Interim Action Proposal, where they found, in part:

Staff is cognizant of the unique challenges Idaho Power has expressed in various forums; particularly with regard to the median income levels of the service territory, customer count, and implications of cost recovery. To this end, Staff is proposing to conduct a workshop before the end of March 2022 with Idaho Power, local Community Action Partnership (CAP) agencies, Community Based Organizations (CBO), and other interested parties to discuss these challenges and explore alternative ways to address energy burden in their service territory. This workflow should not be misinterpreted as meaning Staff does not feel any action is necessary in the Idaho Power service territory, but that more meaningful action may come out of additional discussion focused on this area.

Following this Staff update, and over the course of nearly two years following, the Company engaged in a series of informal and formal discussions with Staff, Community Action Partnership agencies ("CAP Agencies"), and other Community Based Organizations ("CBOs") with an eye towards better understanding the opportunities and challenges present in the Company's service area. Additionally, the Company participated in many of the public workshops held by the other investor-owned utilities ("IOUs") as they moved to quickly implement interim programs. The Company's involvement in the other IOUs' workshops provided valuable insight into the program structures being considered elsewhere in the state and was essential in helping the Company evaluate how rolling out a program in its own service area could be most efficiently implemented.

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<sup>1</sup> UM 2211 "Staff's letter to stakeholders providing implementation strategy update," filed December 22, 2021.

<sup>2</sup> UM 2211 "Idaho Power's Response to Staff's Request for Comments," filed January 10, 2022.

<sup>3</sup> UM 2211 "Staff Interim Action Proposal Update," filed January 31, 2022.

## **UM 2211 TIMELINE**

The following summarizes key milestones throughout Idaho Power's work towards implementation of an interim program under UM 2211. While intended to be a comprehensive summary of key stakeholder meetings and workshops, the milestone list is not entirely exhaustive, as it should be noted that members of Idaho Power's staff had many informal and informational calls with CAP Agencies and other CBOs throughout the process that may not have been formally documented. The Company also notes that while Idaho Power has sought to build and enhance relationships with CBOs in its service area over the course of these activities, Idaho Power does highlight that after receiving informal feedback from Staff that participation at Idaho Power-hosted meetings could have been limited due to the very fact that they were noticed by and hosted by the Company, the Company sought Staff's assistance in noticing future workshops and scheduling meetings. The Company appreciated Staff's suggestion and subsequently begun asking Staff to notice and/or schedule workshops in an effort to enhance inclusivity and maximize stakeholder participation.

### **March 11, 2022 – Idaho Power Meeting with Staff**

Idaho Power and Staff held an initial meeting and generally discussed methods for how to engage with the Company's customers and stakeholders representing its customers most effectively. Specifically, the Company and Staff discussed the merits of the Company administering a survey of Idaho Power's residential customers to solicit input on potential customer-funded bill assistance programs. Idaho Power committed to following up with the two CAP Agencies operating in its service area, Community in Action ("CINA") who largely services customers residing in Malheur County and Community Connection of Northeast Oregon ("CCNO") who largely services customers residing in Baker County.

### **March 23 and April 4, 2022 – Idaho Power Meetings with CINA and CCNO**

The Company discussed the concept of a customer survey and solicited feedback regarding methods for distributing surveys, content, and marketing. Regarding the survey, CINA recommended sending surveys via USPS and email based on customers' preferred communication preference, and that providing an incentive may enhance participation. CCNO provided similar feedback and further recommended providing prepaid return envelopes with surveys sent via USPS as well as suggesting the Company limit the number of questions on the survey to avoid discouraging customer participation.

### **April and May 2022 – Development of Surveys**

The Company met with Staff on April 15, 2022, and provided Staff with an update regarding the discussions that had been held with CINA and CCNO. Through these meetings additional customer-advocacy and assistance organizations were identified, including Euvalcree, Immigrant and Refugee Community Organization, and Northeast Oregon Compassion Center. Generally, Staff and stakeholders were supportive of the Company seeking to understand sentiments directly from Idaho Power's customers through the administration of a survey.

The Company conducted additional outreach where it sought input from Staff, local CAP Agencies, and other stakeholders to seek alignment on the survey's implementation, including the framing of questions and overall structure.

#### **June 30, 2022 – First Idaho Power Workshop<sup>4</sup>**

##### Agenda

- Idaho Power's Oregon Service Area & Customer Demographics
- Assessment of a PGE-like Bill Discount Program
- Overview of Existing Programs
- Customer Survey

##### Feedback Received

Key takeaways from the discussion included a desire from stakeholders to increase the promotion of existing bill and arrearage assistance programs (LIHEAP, Project Share, etc.), encourage customer engagement with local CAP Agencies, and to consider customer arrearages when identifying a potential low-income program.

##### Company Proposed Next Steps

The Company committed to compiling and analyzing the survey results, evaluating program options based on feedback received, hosting a follow-up workshop, and filing a status update or proposal with the Commission.

#### **September 28, 2022 – Second Idaho Power Workshop<sup>5</sup>**

##### Agenda

- Survey Results
- Identified Program and Enhancement Opportunities

The Company provided an overview of the results from the customer survey<sup>6</sup> and discussed several options to be considered to improve access to existing programs, including targeted outreach methods like direct mail and bill inserts, broader outreach strategies, the creation of program brochures, updates to its website, collaboration with CAP Agencies, development of enhanced talking points and brochures, and the use of My Account pop-ups aimed at Oregon residential customers.

##### Company Program Straw Proposal

In the workshop, Idaho Power presented a possible program framework that could be readily implemented, included the following key elements:

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<sup>4</sup> Attachment 1, First Workshop Presentation.

<sup>5</sup> Attachment 2, Second Workshop Presentation.

<sup>6</sup> Results of the customer survey were filed in UM 2211 on October 13, 2022:  
<https://edocs.puc.state.or.us/efdocs/HAH/um2211hah134228.pdf>

- Eligibility – Customers would be eligible for the funds if they were currently receiving LIHEAP or if they self-attest their household meets the income criteria.
- Structure – Assistance would be provided in the form of an annual, lump-sum bill credit to apply towards future bills and/or existing arrears.
- Administration – The Company proposed the program be administered through the local CAP Agencies, as they could rely on systems already in place.
- Bundling – CAP Agencies would be positioned to offer complimentary services, like weatherization and the provision of Project Share bill assistance funds and could make energy efficiency or weatherization information and program resources available to participating customers.

While there was general appreciation towards the Company for proposing a program framework that could be quickly implemented, Staff and stakeholders expressed a number of concerns regarding the program proposal's structure and administration aspects. As a result of such concerns, the Company did not move forward with this proposed program design and instead committed to additional discussions with Staff prior to assess how to best move forward.

#### October 19, 2022 – Idaho Power and Staff informal meeting

Subsequent to Idaho Power's second HB 2475 workshop, the Company sought additional feedback from Staff regarding next steps and through that discussion, reached a consensus that a Low Income Needs Assessment ("LINA") would likely best position the Company to develop a more refined program proposal that balances the unique aspects of Idaho Power's service area.

#### **November 2022 through January 2023 – Selection of Third-Party to Conduct LINA**

Idaho Power initiated contact with multiple LINA providers to explore methodologies, availability, and associated costs for conducting the assessments, and ultimately contracted with Empower Dataworks to conduct a LINA for the Company's Oregon service area. The Company provided a progress update of this work and intended next steps within UM 2211 for Staff and stakeholders' review on January 13, 2023.<sup>7</sup>

#### **March 2, 2023 – Third Idaho Power Workshop<sup>8</sup> with Staff and Stakeholders**

##### Agenda

- LINA Status Update (Hassan Shaban with Empower Dataworks)
- Existing programs (Project Share and weatherization)

##### Summary

The third workshop generally provided a status update on the work undergone toward contracting with Empower Dataworks to complete a LINA. In the workshop, stakeholders were given an opportunity to provide feedback on the scope of the LINA.

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<sup>7</sup> <https://edocs.puc.state.or.us/efdocs/HAC/um2211hac111216.pdf>

<sup>8</sup> Attachment 3, Third Workshop Presentation.

Idaho Power also discussed possible bundling options, including the expansion of eligibility criteria for its weatherization program, aimed at encompassing additional non-gas heating sources which would enable Idaho Power funds to be extended to more rural customers relying on electricity but predominantly heating with wood, propane, fuel oil or other non-metered sources.

### **September 14, 2023 – Fourth Idaho Power Workshop<sup>9</sup>**

#### Agenda

- Oregon LINA Findings<sup>10</sup> Presented by Hassan Shaban with Empower Dataworks
- Idaho Power's HB 2475 Low Income Bill Assistance Framework

Following discussion regarding the LINA, Idaho Power shared elements of a possible program framework with stakeholders.

#### Updated Company Program Straw Proposal

- Eligibility – Targeted to customers that are both low income and have a high energy burden. LIHEAP recipients would be auto enrolled, and program re-enrollment would be required every two years. Customers would be eligible for enrollment via self-attestation that their household meets the income criteria.
- Structure – Bill Discount structure based on 3-tier approach that included a \$750 annual maximum benefit amount. The program's annual costs would be funded by all customers, with a \$1,000 monthly cap applied to non-residential customers.
- Administration – Customers could enroll through a CAP Agency, participating CBO, or by contacting Idaho Power directly and providing self-attestation of program eligibility. Funding would be available to cover a portion of administrative costs for CAP Agency and CBOs enrolling customers.

Additionally, the Company proposed that Idaho Power would conduct a post-enrollment survey of participants and of CAP Agencies, an option be allowed for post-enrollment income verification through a sampling of participating customers, and that the program be risk-free to customers (i.e., if a customer is later deemed ineligible, funds received while participating in the program would not be subject to repayment).

The Company received feedback throughout the meeting regarding several items including, among others: auto-enrollment of LIHEAP participants, the maximum annual benefit cap, and the funding cap for non-residential customers. While the Company had not intended to host an additional workshop before submitting a request to the Commission to implement its Bill Discount Program, Idaho Power recognized stakeholders wanted additional opportunity to discuss the final iteration of a program design prior to a filing. Accordingly, the Company asked meeting participants if a written comment period would be acceptable, so that Idaho Power could better understand stakeholders' perspectives regarding the proposed program design. Stakeholders

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<sup>9</sup> Attachment 4, Fourth Workshop Presentation.

<sup>10</sup> <https://edocs.puc.state.or.us/efdocs/HAH/um2211hah143035.pdf>

were agreeable to this approach and committed to providing written comments regarding the Company's program design.

On September 29, 2023, Community Action Partnership of Oregon ("CAPO"), Citizens' Utility Board ("CUB"), Northwest Energy Coalition ("NVEC"), Verde, and Rogue Climate submitted joint comments<sup>11</sup> regarding Idaho Power's bill discount proposal. In their comments, these stakeholders expressed support for an energy-burden threshold (i.e., only providing targeted benefits to customers), but suggested no maximum annual benefit be established. The commenting stakeholders also recommended that the energy burden screening thresholds should also be applied to LIHEAP recipients instead of automatic enrollment. Finally, the stakeholders opposed any cap on funding requirements for non-residential customers.

Additionally, the commenting stakeholders provided ideas on how Idaho Power could conduct outreach and enroll customers, and provided feedback on future considerations that could be contemplated after an interim program was established.

#### **November 1, 2023 – Fifth Idaho Power Workshop<sup>12</sup>**

##### Agenda

- General Rate Case Timing
- Idaho Power's Final Bill Discount Program Proposal, as modified based on stakeholder feedback
- Plan for expansion of Idaho Power's Weatherization Program

##### Summary

Idaho Power expressed appreciation for the dialogue and involvement from all parties over the course of the last 18 months and highlighted that in each workshop and discussion, the Company received valuable feedback and ideas that helped shape the Bill Discount Program the Company plans to propose for the Commission's approval.

Idaho Power shared stakeholder feedback received and explained that in response to such feedback, it will propose that LIHEAP participants are not auto enrolled and that there be no annual maximum on the benefit amount that participants could receive. Idaho Power acknowledged that stakeholders also requested that there be no funding cap on non-residential customers and explained that after the prior workshop and in response to stakeholder written comments, it had spent additional time evaluating that element of the program. The Company expressed that it had concern about proposing "no cap" for non-residential customer segments, given the impact to those customers who may be required to contribute towards a program that does not enhance or otherwise provide benefit to their receipt of electrical service. Accordingly, the Company modified its proposal from a monthly funding cap of \$1,000 to a monthly funding cap of \$2,000.

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<sup>11</sup> <https://edocs.puc.state.or.us/efdocs/HAC/um2211hac113447.pdf>

<sup>12</sup> Attachment 5, Fifth Workshop Presentation.

With program funding being the only outstanding item of concern for stakeholders, the Company advised stakeholders of its intent to file for approval of its Bill Discount Program in its anticipated upcoming general rate case, where the Commission and all interested parties would have an opportunity to holistically evaluate program design, funding and cost recovery, and the associated impact of these elements on all customer segments. The Company committed to filing an update in UM 2211 after filing its GRC so that stakeholders understood what was being proposed and how they could comment in the case. The Company also committed to being transparent as part of its general rate case filing and making the Commission aware of stakeholders' opposition to the Company's proposed non-residential customer monthly funding cap.

On December 15, 2023, Idaho Power filed UE 426, Idaho Power's Request for a General Rate Revision ("UE 426") and on January 2, 2024, Idaho Power filed an update in UM 2211<sup>13</sup> providing an overview of where to specifically access details regarding the Company's proposed Bill Discount Program within UE 426 and how stakeholders could submit additional comments for the Commission's consideration in UE 426.

Ultimately, the proposal outlined in UE 426 incorporated a wide range of input from stakeholders gathered during the various workshops. The program evolved from its initial concept, which involved the Company providing funding to CAPs to distribute one-time payments to eligible customers, to the one proposed in UE 426 which includes targeted eligibility and monthly on-bill discounts. The participation and feedback of interested stakeholders was instrumental in helping the Company design a Bill Discount Program that is responsive to the unique characteristics and needs of the communities it serves.

The table below represents a summary of the final written feedback from Stakeholders as filed in Docket No. UM 2211 on September 29, 2023, and to what extent the recommendations or feedback was included in the proposal filed in UE 426.

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<sup>13</sup> <https://edocs.puc.state.or.us/efdocs/HAH/um2211hah326002054.pdf>



**September 29, 2023, Written Feedback on Proposed Bill Discount Program Structure:**

<b><u>Topic</u></b>	<b><u>Stakeholder Feedback</u></b>	<b><u>Incorporated into Proposal</u></b>
LINA	Utilize a data-driven process to inform program design given Idaho Power's unique service area.	Yes
Targeted Assistance	Recommend offering discounts only to low-income customers, whose energy bills exceed 6% (3% for non-electric heating customers)	Yes
Discount tiers	The proposed discount tiers provide substantive relief and accept them as a compromise.	Yes
Annual Benefit Cap for participating customers	We oppose the annual maximum benefit of \$750.	Yes. The proposed program does not have a maximum annual benefit.
LIHEAP – application of payments	LIHEAP payments should be applied before determining a customer's energy burden.	Yes
LIHEAP – auto-enrollment of participants	Receipt of LIHEAP should not be an exception to the requirement to be energy burdened.	Yes. LIHEAP participants will not be auto enrolled; rather, determination of energy burden will still be required.
Income Verification	Intake process that relies on self-attestation.	Yes
Cost Recovery Cap	Oppose the proposed \$1,000 cost recovery cap for non-residential customers. There is no need to adopt any cap.	Partially incorporated. Modified original proposal to double the amount of the proposed monthly funding cap, increasing from \$1,000 to \$2,000.

Additionally, the stakeholders also provided several items for Idaho Power to take into consideration in future iterations of its program and/or in regard to marketing and administration of certain aspects of the initial program. The Company is appreciative of the thoughtful feedback and intends to work closely with stakeholders as it develops its plans for implementation. That feedback is summarized as follows:

**September 29, 2023, Additional Written Feedback on Bill Discount Program:**

<u>Topic</u>	<u>Stakeholder Feedback</u>	<u>Incorporated into Proposal</u>
Marketing	It may make sense to initially target enrollment efforts at the 85% of LIHEAP-eligible households that do not participate in LIHEAP due to funding limitations	TBD
Eligibility and Enrollment	Direct outreach informed by the LINA, social media engagement, on-line sign up, and working with CBOs to enroll	Idaho Power is developing an expanded portal that will allow CBOs (in addition to CAPs) to enroll eligible customers
Post-enrollment income verification	Thoughtfully design necessary income verification, including relying on metrics for selection.	TBD
Arrears	Assist with arrears, including a solution to existing high arrears for customers.	TBD
Energy Efficiency	Broaden and enhance weatherization programs to address the households identified as good candidates through the LINA.	TBD
Reporting	Regular reporting and identified performance metrics.	Yes. Additional factors to be reported upon will be considered as part of future conversations or program enhancements.

**UE 426 BILL DISCOUNT PROPOSAL**

On December 15, 2023, Idaho Power filed UE 426, where it is seeking to update rates for all Oregon customers. As part of that filing, Idaho Power presented its proposed Bill Discount Program and associated tariff Schedule 63 and its accompanying funding mechanism, Schedule 64.

Information related to the bill discount proposal, Schedule 63, can be found starting on page 25 in the Direct Testimony of Connie G. Aschenbrenner (“Aschenbrenner Direct”) submitted in Docket UE 426. An explanation of the Company’s proposed funding mechanism, Schedule 64, can be found starting on page 31 in Aschenbrenner Direct.

Additionally, the proposed Schedules 63 and 64 are provided on pages 117-119 of Exhibit 1303 of Aschenbrenner Direct. While the proposed tariff schedules outline the framework (availability, enrollment, program description, and customer terms and conditions) and the cost recovery mechanism (purpose, applicability, and monthly adjustment of rates) of the program, the Company expects that certain administrative components of the program, such as marketing methods and elements of post-enrollment surveys, will continue to be discussed with stakeholders, as described in Aschenbrenner Direct.

A summary of key programmatic elements can be found in the following table:

<b>Eligibility Criteria:</b>
Income ( $\leq 60\%$ of State Median Income (SMI), adjusted for household size)
Customers may self-certify income through Idaho Power or participating CAP Agencies and/or CBOs
No automatic enrollment for LIHEAP recipients
Option for CAP Agencies and/or Community Based Organizations (CBOs) to enroll customers in program
<b>Program Discounts:</b>
0-20% SMI – 60%
20-40% SMI – 25%
40-60% SMI – 10%
Energy burden $>6\%$ for electrically heated homes and $>3\%$ for non-electrically heated homes
No annual benefit cap
Program is risk-free to participants
<b>Post Enrollment:</b>
Participants re-enroll every 2 years
Post-enrollment survey of participants and enrolling CAP Agencies/CBOs will be conducted <sup>14</sup>
May conduct post-enrollment income verification through a sampling of participating customers <sup>15</sup>
<b>Tracking and Reporting:</b>
Track and provide reporting of costs on a quarterly basis
Report on monthly metrics on quarterly basis

<sup>14</sup> Although the Company has not yet determined the frequency for which it plans to survey these CAP Agencies and CBOs, the Company is open to meeting with Staff and stakeholders to develop questions and design of the surveys that will eventually be sent to program participants, CAP Agencies and CBOs.

<sup>15</sup> The Company intends to conduct post-enrollment income verification via a three percent sample of participants that have not received LIHEAP within the previous two years; however, it has not yet finalized this process and is open to meeting with Staff and stakeholders to collaborate on its final design.

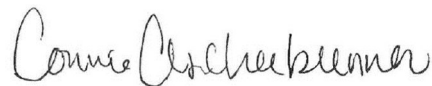
### **UE 426 DISCOVERY**

The Company has received a number of discovery requests from Staff regarding the proposed Bill Discount Program. These requests include, but are not limited to, providing further context on the cost recovery mechanism, detailing the methodology used for the proposed caps, providing estimates for anticipated customer qualification, disclosing the total program cost, furnishing LIHEAP data, and addressing other related matters. Attachment 6 – Discovery contains all discovery related to the proposed Bill Discount Program and associated cost recovery mechanism that has been submitted in UE 426 as of today's date.

### **CONCLUSION**

The Company is appreciative of the engagement of Staff and stakeholders over the course of UM 2211 as Idaho Power developed its Bill Discount Program. To the extent stakeholders wish to offer additional input on the Company's Bill Discount Program, there continue to be opportunities to do so; interested parties may offer feedback in UE 426 regarding the Company's proposed Bill Discount Program, either independently or in conjunction with other changes proposed as part of its GRC. In its January 2, 2024, update filed in UM 2211 and UE 426, Idaho Power summarized methods for interested stakeholders to provide comments and provided a link where individuals could find more information related to access to intervenor funding.<sup>16</sup>

Sincerely,



Connie Aschenbrenner

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<sup>16</sup> <https://edocs.puc.state.or.us/efdocs/HAH/um2211hah326002054.pdf>

# **ATTACHMENT 1**

# HB 2475 Workshop

June 2022

# HB 2475 Workshop



## Agenda

- 1) Opening and introductions
- 2) Idaho Power Oregon service area and customer demographics
- 3) Hypothetical bill-discount program
- 4) Existing programs
- 5) Customer survey overview
- 6) Next steps
- 7) General discussion

# Introductions





# HB 2475 Workshop



## HB 2475 Update

- **ORS 757.230 has been amended:**

*The Public Utility Commission shall provide for a comprehensive classification of service for each public utility, and such classification may take into account...**differential energy burdens on low-income customers and other economic, social equity or environmental justice factors that affect affordability for certain classes of utility customers, and any other reasonable consideration.***

- **HB 2475 also specifies that:**

*The costs of tariff schedules, rates, bill credits or program discounts allowed...**must be collected in the rates of an electric company through charges paid by all retail electricity consumers...***

- **UM 2211 - OPUC Staff Investigation**

- Staff is cognizant of the unique challenges Idaho Power has expressed in various forums particularly with regard to the median income levels of the service territory, customer count, and implications of cost recovery.
- To this end, Staff is proposing to conduct a workshop...with Idaho Power, local Community Action Partnership (CAP) agencies, Community Based Organizations (CBO), and other interested parties to discuss these challenges and explore alternative ways to address energy burden in their service area.

# HB 2475 Workshop



## Agenda

- 1) Opening and introductions
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# Idaho Power

## Oregon Service Area



# Idaho Power

## Oregon Service Area

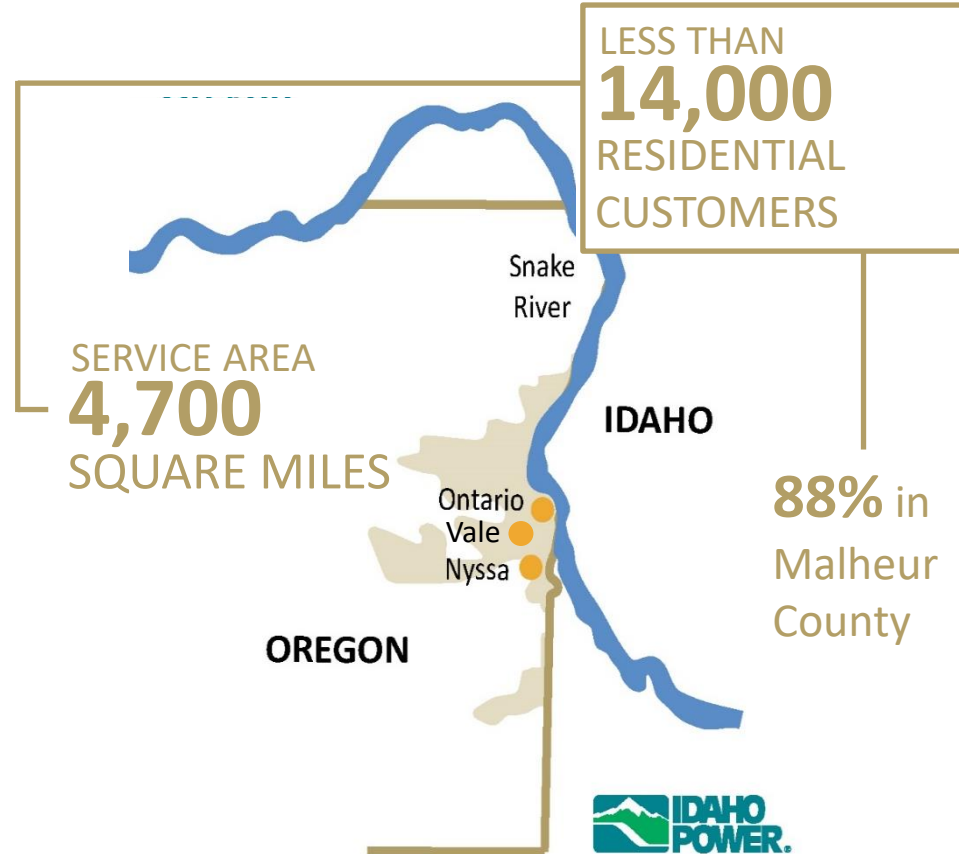


### Largest Cities/Towns

- 1 Ontario, population ~11,000
- 2 Nyssa, population ~3,200
- 3 Vale, population ~2,200

### Nearest Metropolitan Area

- 1 Boise, ID (~56 miles)
- 2 Bend, OR (~260 miles)

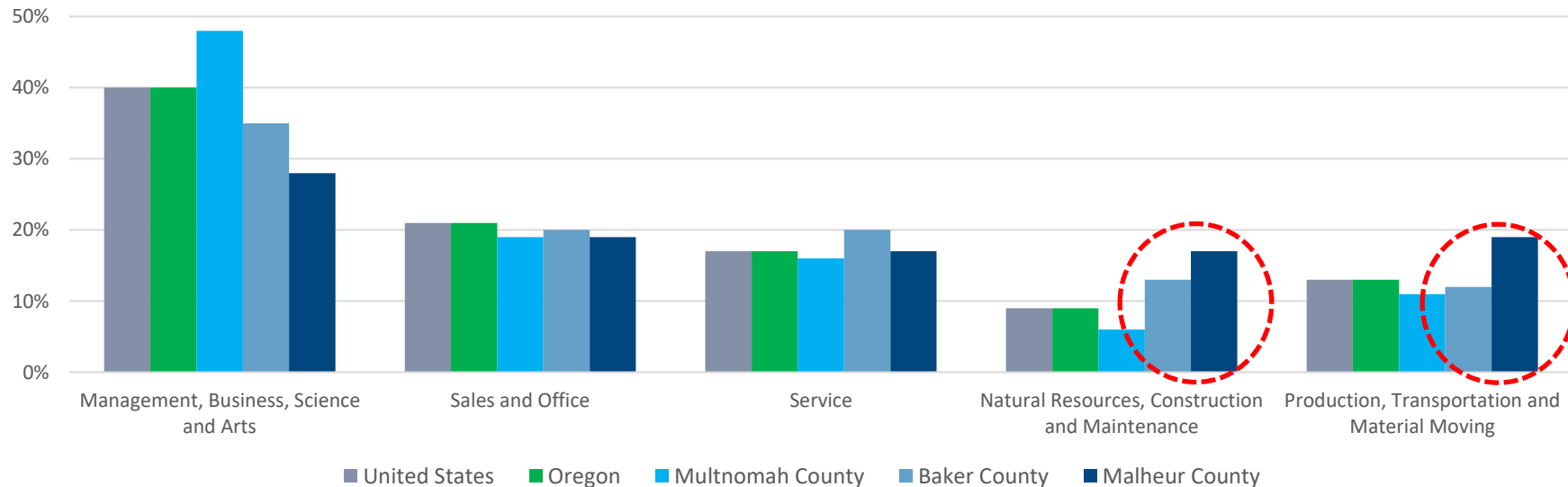


# Idaho Power

## Residential Customer Demographic Overview



### Occupations by Percent of Employment

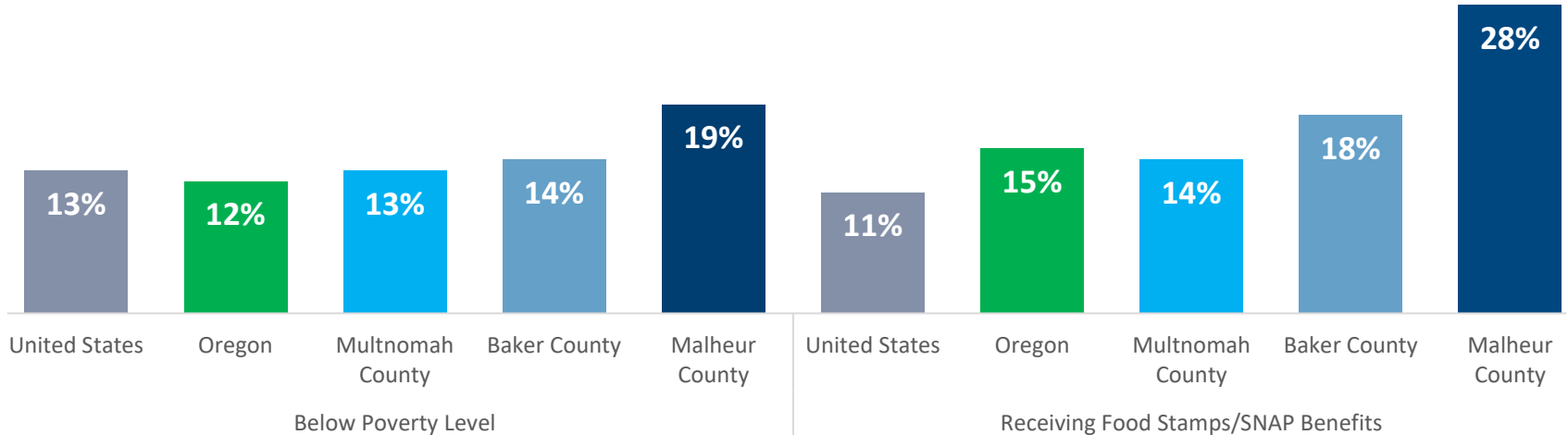


# Idaho Power

## Residential Customer Demographic Overview



### Percent of Households



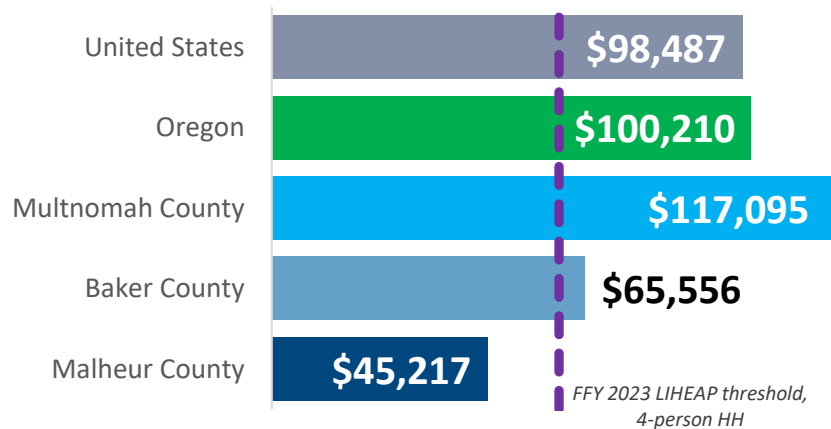
The U.S. Census defined the 2020 poverty threshold as \$13,465 for a single adult under 65 years old and as \$26,246 for a family of two adults and two children.

# Idaho Power

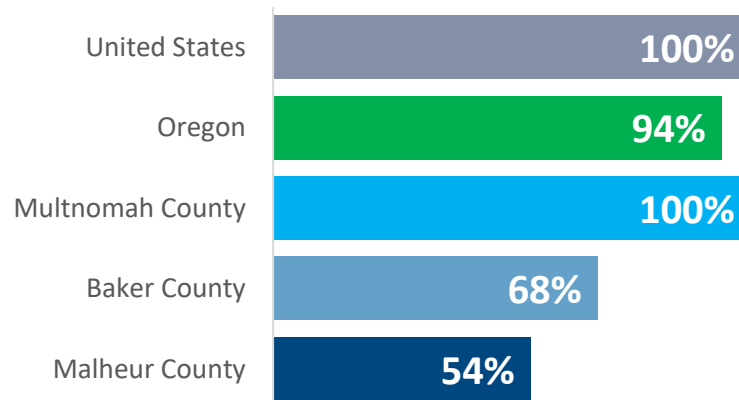
## Residential Customer Demographic Overview



### Median Household Income<sup>1</sup>



### Wealth Index



<sup>1</sup> Median household income reflects that of a 4-person family in 2020 inflation-adjusted dollars.

Sources: U.S. Census Bureau, 2016-2020 5-year estimates, American Community Survey, table B19119; U.S. Dept. of Health and Human Services' LIHEAP 2022-04 SMI Estimates; U.S. and Oregon Gazetteer, <https://www.hometownlocator.com>

The Wealth Index is based on a number of indicators of affluence including average household income and average net worth, but it also includes the value of material possessions and resources. It represents the wealth of the area relative to the national level. Values above or below 100 represent above-average wealth or below-average wealth compared to the national level. Data as of July 1, 2021.

# Idaho Power

## Residential Customer Demographic Overview



### 2022 Residential End-Use Survey

#### Of the Oregon respondents:

- 66% live in a single-family home
- 26% live in a mobile or manufactured home
- 67% live in a home built before 1980
- 63% of homes are less than 1,800 sq. ft. in size
- 23% have heating systems that are 20+ years old
- 62% use a stove/fireplace or portable room heater as an additional heating system
- 46% use a heat pump or individual room/window unit as their air conditioning system
- 47% have a manually adjusted, non-programmable thermostat



# HB 2475 Workshop



## Agenda

- 1) Opening and introductions
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# Hypothetical, PGE-like Low-Income Bill Discount Program

## Design and Assumptions

### Bill discount levels:

- Up to 30% of SMI → **25%**
- 31% - 45% of SMI → **20%**
- 46% - 60% of SMI → **15%**

### Total Estimated Income Qualified Residential Customers:

- 7,260 (~52% of residential customers)

Sources: Axiom demographic data for estimated household income by service point; PGE Advice No. 22-01 Income Qualified Bill Discount; PacifiCorp Advice No. 22-008 Residential Low Income Bill Discount

## Estimated Residential Bill Increase

### Assuming 75% participation:

Customers enrolled	5,445
Annual program funding	\$1,544,044

<b>Monthly Bill Increase*</b>	<b>\$4.07</b>
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\*Assumes a \$1,000/mo. cap for non-residential customers; does not include admin. costs

## Res. Mo. Bill Increase, Peer Comparison

Idaho Power	Portland General	Pacific Power
\$4.07 (3.4%)	\$1.58 (1.5%)	\$1.75 (2.0%)

# HB 2475 Workshop



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# Existing Programs



## Energy Efficiency Programs

- 9 EE programs available to residential customers
- Program focused directly on low-income customers.
  - ✓ WAQC (\$45,000 funded annually)

## Project Share

2020-2021 Program Year

~25  
Customers  
Received  
Funding

\$200  
Average  
Bill  
Assistance

**Project Share** Help neighbors in need with energy costs.

I pledge \$ \_\_\_\_\_ on my monthly bill.

Round up my monthly bill amount to the nearest dollar.

I would like to make a one-time donation of \$ \_\_\_\_\_

For more information, visit [idahopower.com/projectshare](http://idahopower.com/projectshare). **Thank you!**

## My Account & Usage Alerts

**55%** of residential customers have an active My Account profile

**<5%** of residential customers with an Active My Account profile are signed up for bill threshold alerts

Receive a text or email notification if your bill for the current billing period is estimated to exceed the threshold amount you select.

Account \*

Dollar Amount \*

Contact Type \*

Subscribe

\$50  
\$100  
\$150  
Custom

Mobile Phone  
Email

# HB 2475 Workshop



## Agenda

- 1) Opening and introductions
- 2) Idaho Power Oregon service area and customer demographics
- 3) Hypothetical bill-discount program
- 4) Existing programs
- 5) Customer survey overview
- 6) Next steps
- 7) General discussion

# Survey Question Categories



- Assess the need for assistance
- Assess interest in services and programs
- Assess how programs should be funded
- Assess awareness of current offerings

I am aware of Idaho Power's Project Share program administered through the Salvation Army

- Strongly agree
- Somewhat agree
- Neither agree nor disagree
- Somewhat disagree
- Strongly disagree

# HB 2475 Workshop



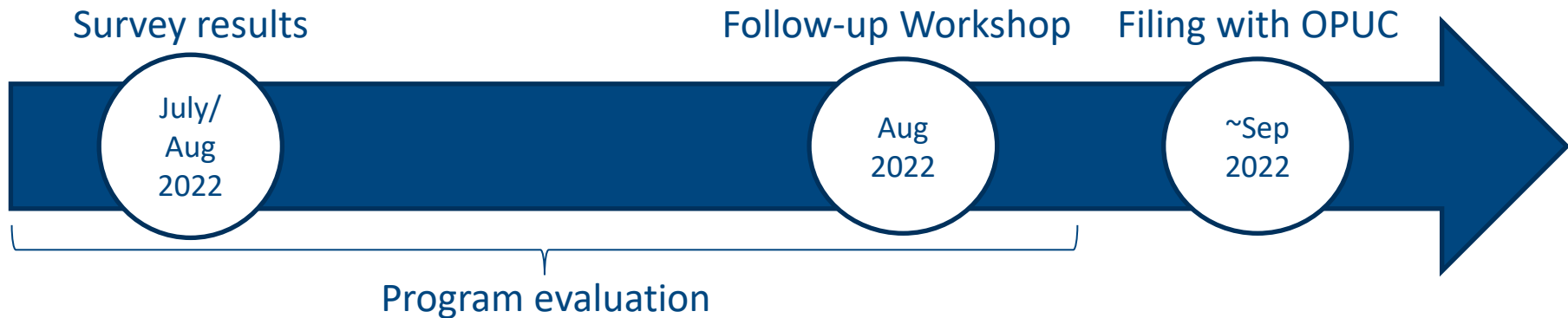
## Agenda

- 1) Opening and introductions
- 2) Idaho Power Oregon service area and customer demographics
- 3) Hypothetical bill-discount program
- 4) Existing programs
- 5) Customer survey overview
- 6) Next steps
- 7) General discussion



# Next Steps

- Compile & analyze survey results
- Evaluate program options based on feedback received
- Reconvene stakeholder group (follow-up workshop)
- File status update or proposal with OPUC





# HB 2475 Workshop



## Agenda

- 1) Opening and introductions
- 2) Idaho Power Oregon service area and customer demographics
- 3) Hypothetical bill-discount program
- 4) Existing programs
- 5) Customer survey overview
- 6) Next steps
- 7) General discussion

# General Discussion

Cheryl Paoli  
CPaoli@IdahoPower.com  
208-388-2679

# **ATTACHMENT 2**

# HB 2475 Workshop

September 2022



# HB 2475 2<sup>nd</sup> Workshop



## Agenda

- **Introductions**
- Idaho Power HB 2475 1<sup>st</sup> Workshop Recap
- Idaho Power residential customer survey results
- Program and enhancement opportunities
  - Marketing enhancement
  - Low-income weatherization program modification
  - HB 2475 low-income program
- Next steps and general discussion

# Introductions



# HB 2475 2<sup>nd</sup> Workshop



## Agenda

- Introductions
- Idaho Power HB 2475 1<sup>st</sup> Workshop Recap
- Idaho Power residential customer survey results
- Program and enhancement opportunities
  - Marketing enhancement
  - Low-income weatherization program modification
  - HB 2475 low-income program
- Next steps and general discussion

# HB 2475 2<sup>nd</sup> Workshop



## First HB 2475 Workshop Recap

- Discussed Idaho Power's Oregon service area
  - Residential customer base characteristics
  - General concern related to implementing a bill discount program
- Reviewed existing bill assistance and weatherization programs
- Discussed Idaho Power's recent customer survey
- Some feedback received feedback from attendees:
  - Increase promotion of existing programs
  - Encourage customer engagement with local CAP Agencies
  - Consider customers' arrearages when identifying potential low-income programs



# HB 2475 2<sup>nd</sup> Workshop



## Agenda

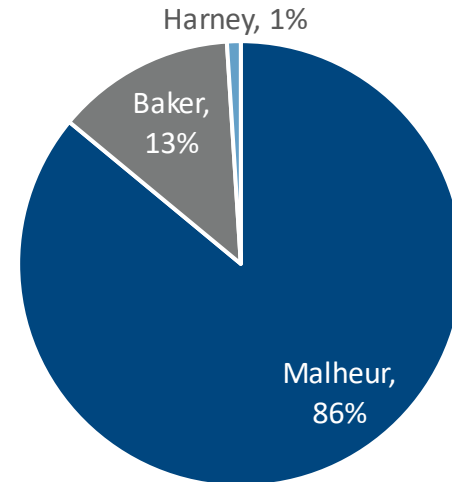
- Introductions
- Idaho Power HB 2475 1<sup>st</sup> Workshop Recap
- Idaho Power residential customer survey results
- Program and enhancement opportunities
  - Marketing enhancement
  - Low-income weatherization program modification
  - HB 2475 low-income program
- Next steps and general discussion

# HB 2475 2<sup>nd</sup> Workshop



## Idaho Power Residential Customer Survey

- Surveys sent late May 2022 to mid June 2022
- Sent to all residential customers (11,445)
  - 46% paper
  - 54% email
  - 1,243 respondents (~11% response rate)
    - 467 by email (~8% response rate)
    - 776 paper (~15% response rate)



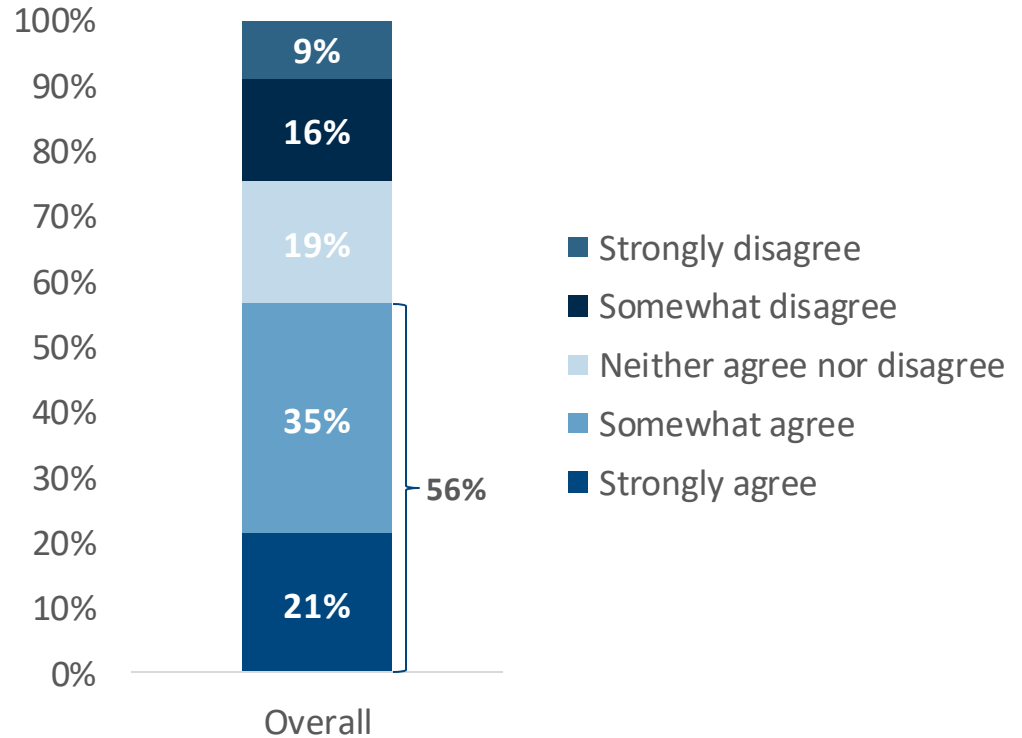
Respondents by County

# HB 2475 2<sup>nd</sup> Workshop



## Idaho Power Residential Customer Survey

Question:  
“My power bill is affordable”

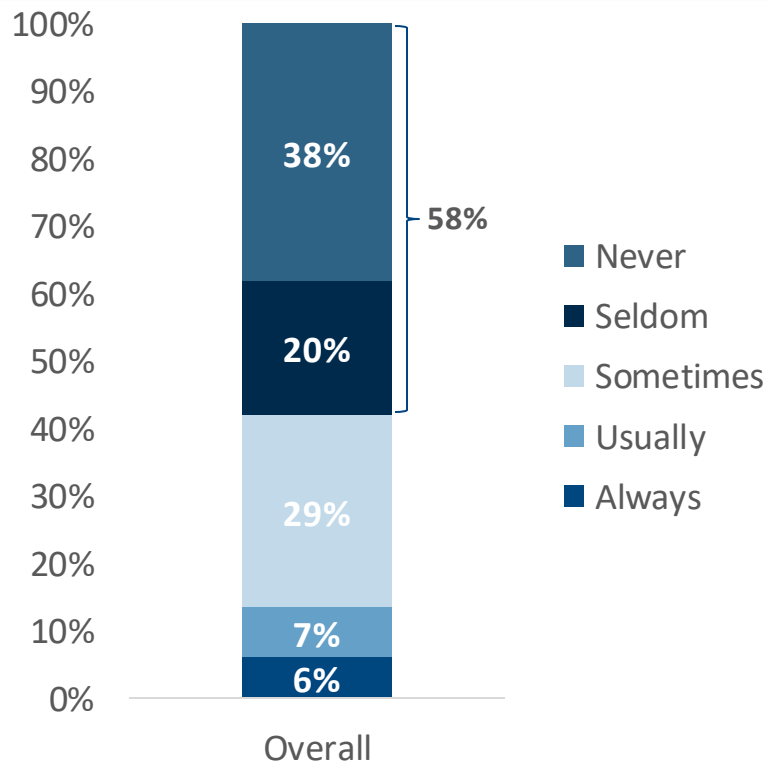


# HB 2475 2<sup>nd</sup> Workshop



## Idaho Power Residential Customer Survey

Question:  
“I have trouble paying my  
monthly power bill”

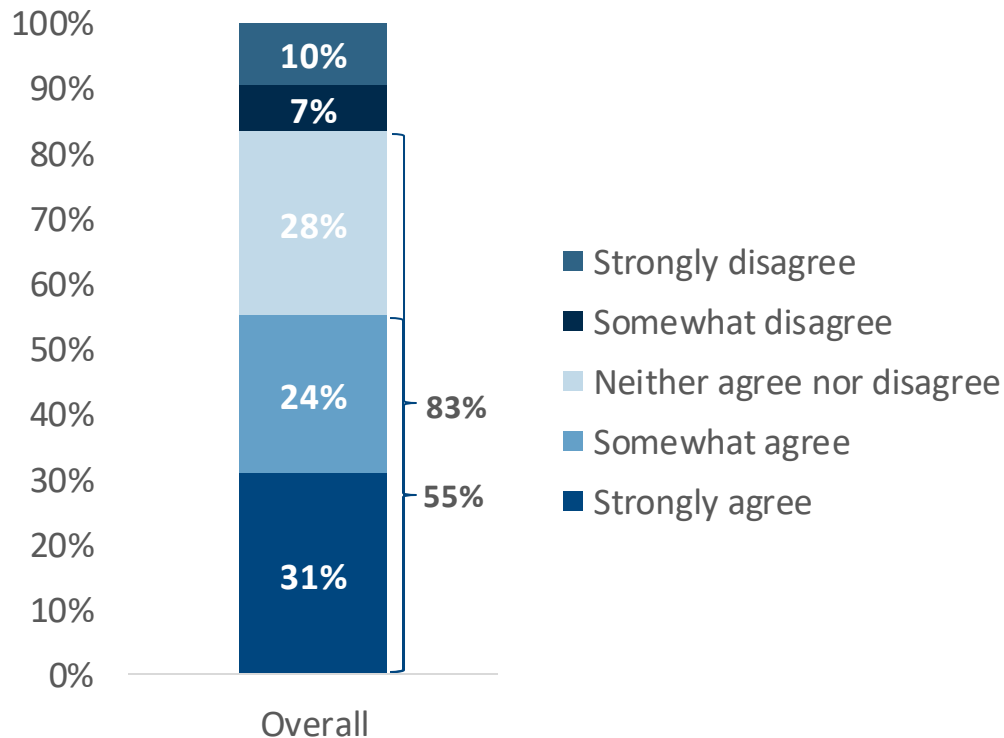


# HB 2475 2<sup>nd</sup> Workshop



## Idaho Power Residential Customer Survey

**Question:**  
“There is a need to develop a new program to assist customers who struggle to pay their power bills”



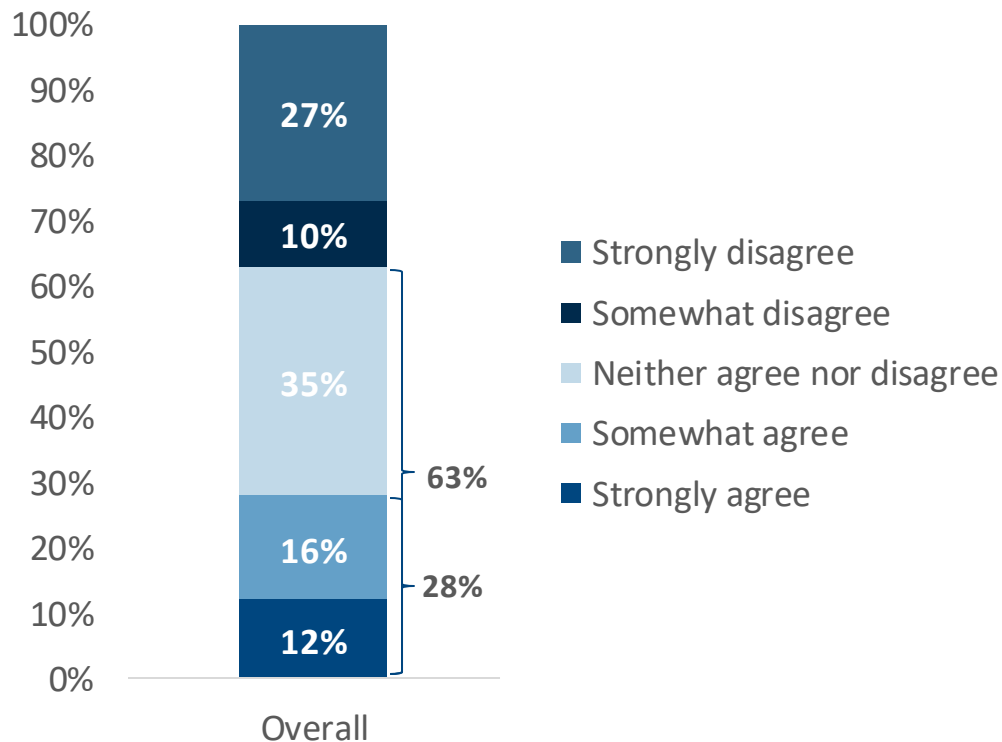
# HB 2475 2<sup>nd</sup> Workshop



## Idaho Power Residential Customer Survey

**Question<sup>1</sup>:**  
**“The costs of a bill-payment assistance program should be collected in rates paid by Idaho Power customers in Oregon”**

<sup>1</sup> Respondents who disagreed that there is a need to develop a new program to assist customers who struggle to pay their power bills were not asked this question.



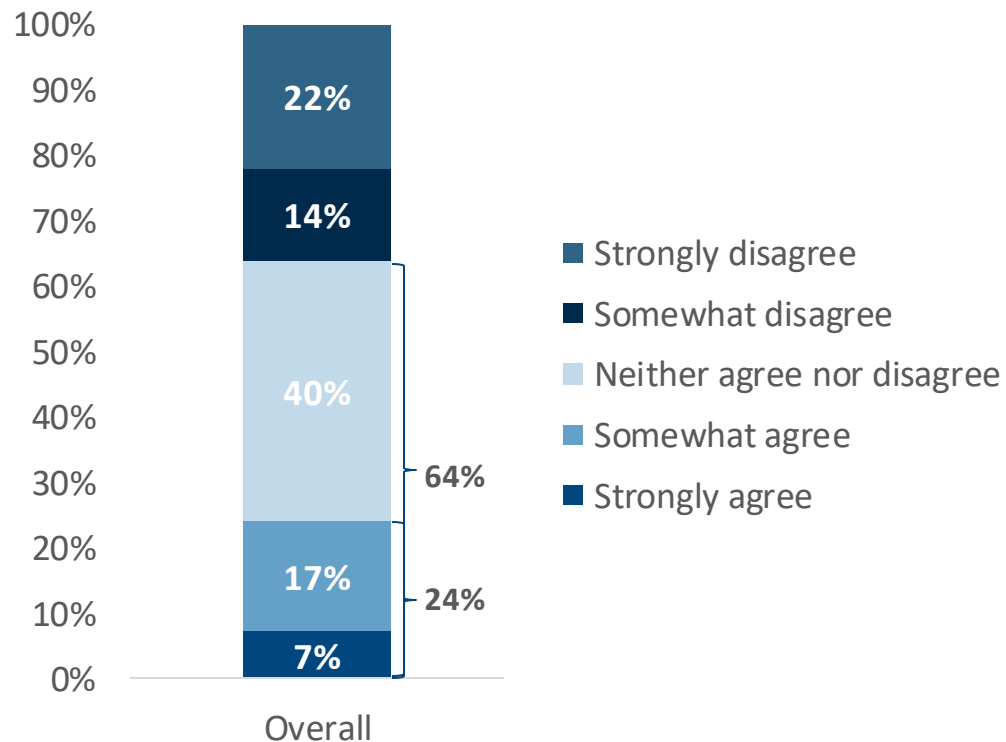
# HB 2475 2<sup>nd</sup> Workshop



## Idaho Power Residential Customer Survey

**Question<sup>1</sup>:**  
**“I would voluntarily contribute to a program to assist customers who struggle with paying their power bills”**

<sup>1</sup> Respondents who disagreed that there is a need to develop a new bill assistance program or that the costs of such a program should be collected in the rates paid by Idaho Power customers in Oregon were not asked this question.

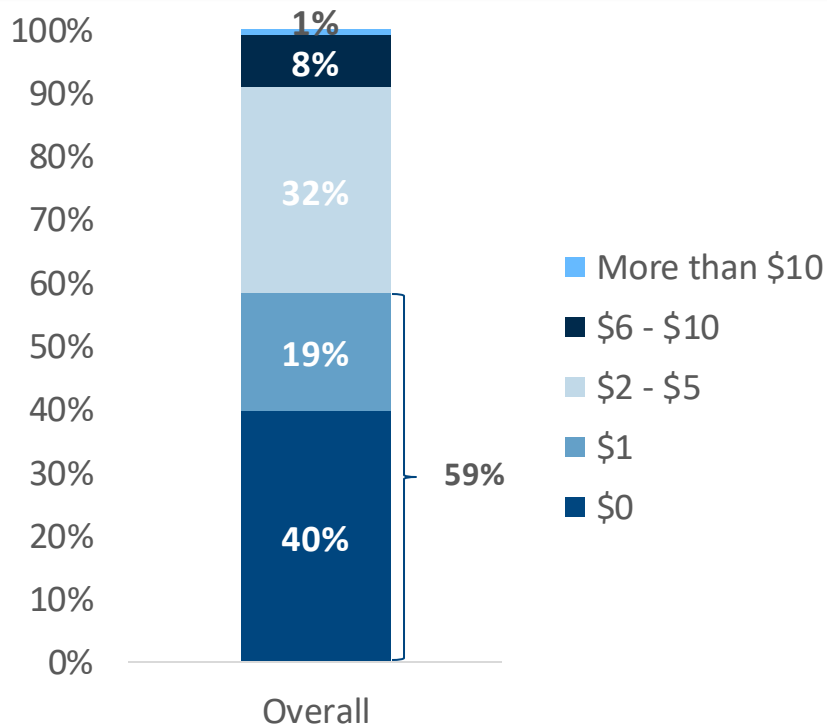


# HB 2475 2<sup>nd</sup> Workshop



## Idaho Power Residential Customer Survey

**Question<sup>1</sup>:**  
“I would voluntarily contribute \_\_\_ per month to fund a bill-assistance program for helping customers who struggle to pay their power bills”



<sup>1</sup> Respondents who disagreed that there is a need to develop a new bill assistance program or that they would voluntarily contribute to such a program were not asked this question.

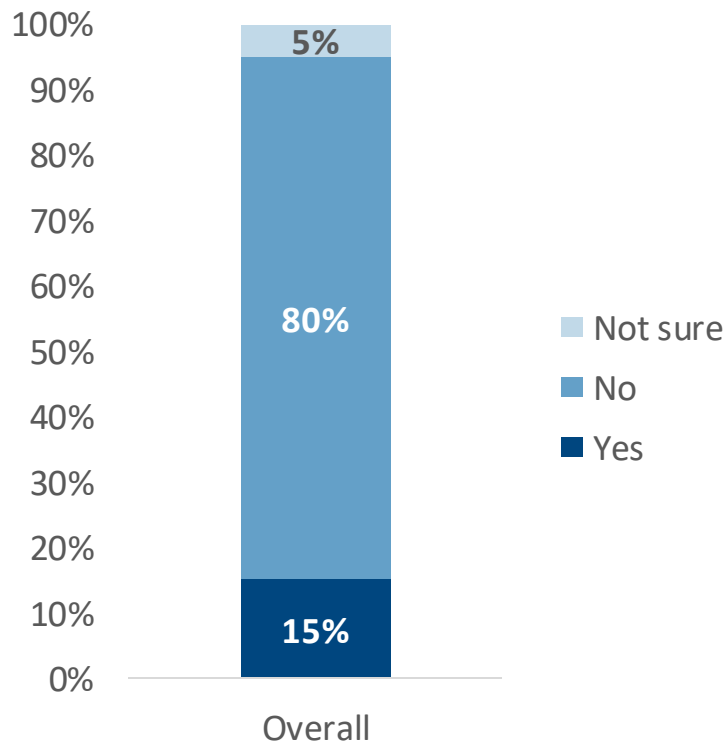


# HB 2475 2<sup>nd</sup> Workshop



## Idaho Power Residential Customer Survey

**Question:**  
“My household has requested energy bill assistance at some point since January 2021 (e.g., LIHEAP, etc.)”

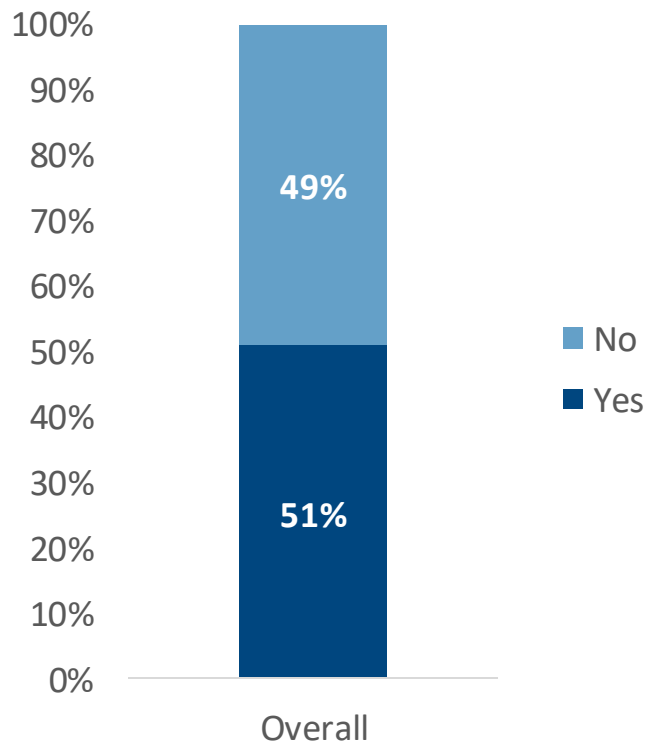


# HB 2475 2<sup>nd</sup> Workshop



## Idaho Power Residential Customer Survey

**Question:**  
“I am aware of Idaho Power’s residential weatherization program for low-income customers offered through a local assistance agency”

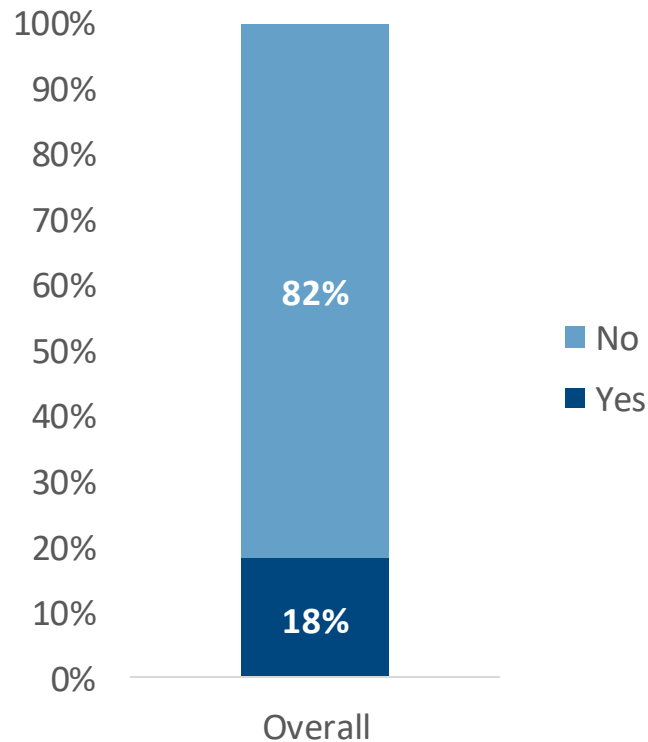


# HB 2475 2<sup>nd</sup> Workshop



## Idaho Power Residential Customer Survey

**Question:**  
“I am aware of Idaho Power’s  
Project Share program  
administered through the  
Salvation Army”

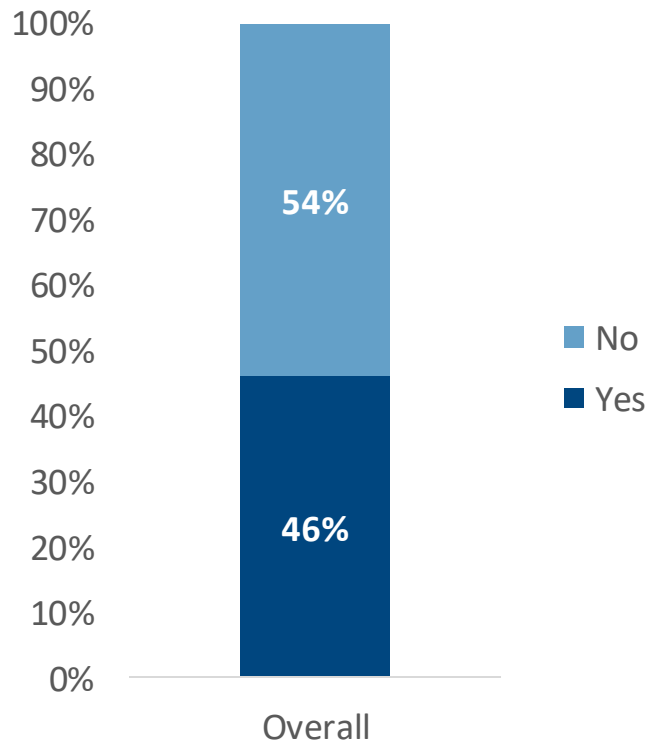


# HB 2475 2<sup>nd</sup> Workshop



## Idaho Power Residential Customer Survey

**Question:**  
“I would find value in an educational workshop that focused on helping identify ways to reduce my power bill”



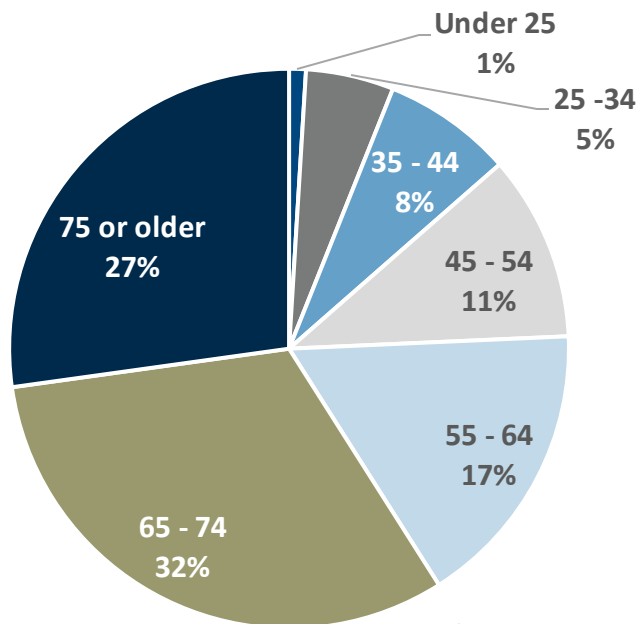
# HB 2475 2<sup>nd</sup> Workshop



## Idaho Power Residential Customer Survey

Question:

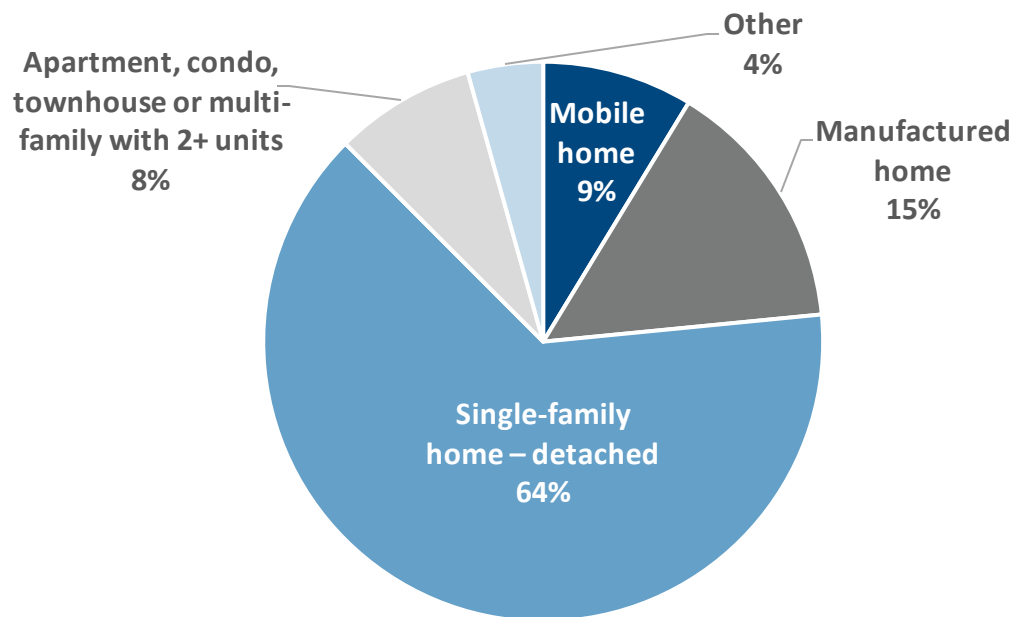
“My age is best described as...”



*\*may not sum to 100% due to rounding*

Question:

“My residence would be best described as...”



# HB 2475 2<sup>nd</sup> Workshop



## Agenda

- Introductions
- Idaho Power HB 2475 1<sup>st</sup> Workshop Recap
- Idaho Power residential customer survey results
- Program and enhancement opportunities
  - Marketing enhancement
  - Low-income weatherization program modification
  - HB 2475 low-income program
- Next steps and general discussion

# HB 2475 2<sup>nd</sup> Workshop



## Marketing Enhancement Opportunities

- Targeted outreach such as direct mail, bill inserts
- Broader outreach such as newspaper and radio ads, social media posts
- Energy Assistance, Weatherization program brochures
- Website updates on the Oregon *Get Help Paying Your Bill* page
- Promote during Idaho Power-attended CAP Agency energy fairs
- Partner with CAP Agencies and other partners to cross-promote on their channels
- Enhanced talking points and brochures for Customer Service Representatives & Energy Advisors
- My Account pop-up targeting Oregon residential customers

# HB 2475 2<sup>nd</sup> Workshop



## Agenda

- Introductions
- Idaho Power HB 2475 1<sup>st</sup> Workshop Recap
- Idaho Power residential customer survey results
- **Program and enhancement opportunities**
  - Marketing enhancement
  - Low-income weatherization program modification
  - HB 2475 low-income program
- Next steps and general discussion



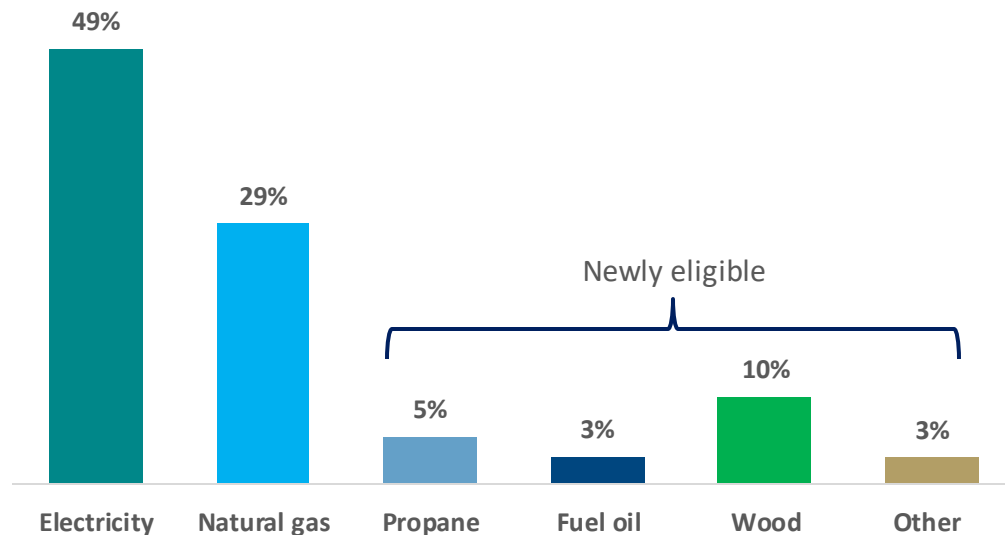
# HB 2475 2<sup>nd</sup> Workshop



## Weatherization Program Modification

Allow low-income customers to participate if their primary heat source is a non-metered fuel type but they use electric heating as a back-up/secondary heat source.

**Idaho Power Residential  
Customer Survey:  
“The Fuel used most often to heat  
my residence is best described as...”**



*\*may not sum to 100% due to rounding*

# HB 2475 2<sup>nd</sup> Workshop



## Agenda

- Introductions
- Idaho Power HB 2475 1<sup>st</sup> Workshop Recap
- Idaho Power residential customer survey results
- **Program and enhancement opportunities**
  - Marketing enhancement
  - Low-income weatherization program modification
  - HB 2475 low-income program
- Next steps and general discussion

# HB 2475 2<sup>nd</sup> Workshop



## HB 2475 Low-income Bill Assistance Framework

### Final Baseline Evaluation Criteria for Interim Action

At minimum, Staff will review utility interim rate or program filings for inclusion of the following:

KEY DESIGN ELEMENTS	Eligibility ✓	Level of relief ✓	Tracking and accounting ✓	Bundling ✓	Outreach and engagement ✓
	<p>Low-barrier enrollment component(s) should be included (e.g. self-certification; categorical eligibility; etc.)</p> <p>Auto-enrollment for energy assistance recipients should be included</p> <p>Options for CBOs to submit eligible customers to the utility should be included</p>	<p>Prioritizes lowest income with the highest energy burden</p>	<p>Monthly zip code level reporting on enrollments for first 12 months, quarterly thereafter unless guidance is updated following the broader investigation. Monthly data should include, but not be limited to:</p> <ul style="list-style-type: none"> <li>• Assistance dollars per customer;</li> <li>• Total and average arrears of participants (by 30, 60, 90+ days aged buckets);</li> <li>• Percentage of EA recipients;</li> <li>• Difference in average bill of participating versus non-participating customer.</li> </ul>	<p>Information sharing with ETO and energy efficiency and weatherization administrating agencies about interim rate and program participants</p>	<p>Transparent and informative</p>
	<p>Eligibility criteria should be income-based in the interim (the broad investigation can explore other criteria)</p>	<p>Utility proposal should explain how the interim rate was designed to provide a meaningful reduction of energy burden (e.g., Staff will look at how the utility considered a target energy burden ceiling (6%) when identifying the income tiers and discount levels provided by the proposed rate)</p>	<p>Program costs are tracked and reported quarterly in a deferral with sufficient detail for ongoing Staff review and discussion</p>	<p>Collaborates with energy efficiency and weatherization partnering agencies on complementary services and potential cross referrals</p>	<p>Regularly scheduled (monthly or quarterly) discussions and consultations with partnering agencies representing or servicing target communities; consolidating with peer utilities where possible</p>
		<p>Allows flexibility or direct engagement opportunities in program design to accommodate enrollments reasonably outside specific eligibility terms</p>	<p>Continued workshops with Staff and Stakeholders on right-sizing data collection and leveraging work done by other agencies; specific attention to more granular reporting of demographic and income data.</p>	<p>Makes energy efficiency or weatherization information and program resources available to participating customers</p>	<p>Demonstrates the Company provided meaningful engagement in advance of filing</p>
					<p>Surveys participating customers and CAP agencies at 3, 6, and 12 months of implementation</p>

# HB 2475 2<sup>nd</sup> Workshop



## HB 2475 Low-income Bill Assistance Framework

Low-income bill assistance program, administered through local CAP Agencies, that provides funding to residential customers in need in the form of an annual, lump-sum bill credit to apply towards electric bills.

- Minimum total annual program funding of \$450,000
  - Monthly bill increase of ~\$1.02 for residential customers
    - Assumes a \$1,000 monthly bill cap for non-residential customers
- Funding proportioned to CAP Agencies

# HB 2475 2<sup>nd</sup> Workshop



## HB 2475 Low-income Bill Assistance Framework

- Customers participate thru their local CAP Agency
- Customer to receive bill assistance payment of \$250 to \$500
  - Estimated to offset ~18% - 36% of participating customers' annual power bill<sup>1</sup>
- Eligible customers include:
  - Currently receiving LIHEAP, or
  - Self-attest their household meets income criteria (60% SMI)
    - Immediate relief to qualifying customers unable to collect or provide documentation
- Participants to reapply annually

<sup>1</sup> Only accounts for base rates plus power cost riders (Schedules 55 and 56).

# HB 2475 2<sup>nd</sup> Workshop



## HB 2475 Low-income Bill Assistance Framework

- CAP Agencies will encourage participation in other programs/assistance available
  - 15% of their portion of the program's annual funding toward administration
- Idaho Power will conduct a post-enrollment survey of participants and of CAP Agencies
- Idaho Power may facilitate post-enrollment income verification
  - sample of participating customers
  - excludes participants who received LIHEAP
- Program risk-free to customers
- Idaho Power will report on monthly metrics
- Idaho Power will track and provide reporting of costs on a quarterly basis

# Next Steps and General Discussion

# **ATTACHMENT 3**



# HB 2475 Workshop

March 2023



# HB 2475 3<sup>rd</sup> Workshop



## Agenda

- 1) Introductions and Recap
- 2) Low Income Needs Assessment (LINA) Overview
- 3) Project Share Update
- 4) Proposed Expansion of Weatherization Assistance Program Eligibility
- 5) Customer Education and Engagement Forums
- 6) Open Discussion

# Introductions



# HB 2475 3<sup>rd</sup> Workshop



## September 2022 HB 2475 Workshop Recap

- Reviewed Idaho Power's Residential Bill Assessment Survey Results
- Proposed an interim Bill Assistance Program
  - Feedback:
    - LIHEAP-like approach was not preferable
    - Preference for monthly bill assistance vs. annual
    - Concern raised it may not provide the desired level of targeted relief

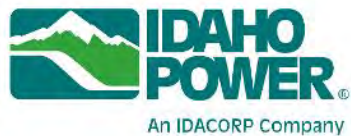
**A Low Income Needs Assessment (LINA) will best inform the level of targeted assistance and eligibility criteria that should be considered as part of a future HB 2475 proposal**

# HB 2475 3<sup>rd</sup> Workshop



Idaho Power's Low Income Needs Assessment

empower  
dataworks



# Low Income Needs Assessment

## Project Overview

empower  
dataworks



# High-level Goal

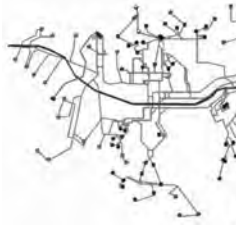
- Support Idaho Power HB 2475 differential rate or bill discount proposals, specifically the level of assistance and eligibility criteria

# Challenges in Idaho Power's Oregon service area

- ***Small cost recovery base in Oregon:*** Program costs will result in a significant bill impact for non-participants. The lowest income non-participants could potentially see a 0.5-1% increase in energy burden.
- ***Participation barriers:*** The more conservative nature of residents in eastern Oregon introduces a barrier to participation due to the stigma associated with assistance programs. Rural nature and geographic size is a challenge for outreach.
- ***Administrative challenges:*** For smaller programs, overhead and administrative complexity represent a higher fraction of program budgets.



# Our Strategy



Calculate energy assistance need based on customer-level geographic, demographic and building data.



Segment the data to identify customer groups with the highest level of need.

*Are specific customer groups in Malheur/Baker/Harney counties underserved by existing energy assistance?*



Develop program design options targeted at the highest need customers. Also explore creative ways of funding/implementing this program.

# Data Sources

→ CIS Data (by address) *Understand gaps*

→ Energy assistance data

→ Weatherization program data

→ Disconnections and late payments

*Prioritization beyond energy burden*

## Segmentation

→ Demographic data

→ Census data

→ Benchmarking data from other utilities

Data Collection

Analysis

Reporting

Data Wrangling

# Analysis

Key outputs:

- Energy burden based on geographic, demographic and building characteristics (heating fuel, building age etc.)
- Energy assistance need (\$) for different definitions of “high energy burden”
- Gap between need and energy assistance program performance
- Required assistance levels for different customer segments

Data Collection

Analysis

Reporting

Data Wrangling

# Deliverables

- Dashboard + data to facilitate iterative analysis and integration of feedback.
- New program scenarios
- Low income needs assessment report



## Idaho Power - Oregon Low Income Needs Assessment

*Tentative Project timeline*

**Start Date:** 3/13/2023

TASK ID	TASK TITLE	START DATE	END DATE	WEEK:	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19	20	21	22	23	24	25
				DATE:	3/13	3/20	3/27	4/3	4/10	4/17	4/24	5/1	5/8	5/15	5/22	5/29	6/5	6/12	6/19	6/26	7/3	7/10	7/17	7/24	7/31	8/7	8/14	8/21	8/28
1	Data collection and cleaning	3/13/23	4/23/23		█	█	█	█	█	█																			
2	Analysis and energy burden calculations	4/24/23	6/25/23								█	█	█	█	█	█	█	█	█	█									
3	Stakeholder engagement	3/13/23	9/3/23		█	█	█	█	█	█	█	█	█	█	█	█	█	█	█	█	█	█	█	█	█	█	█	█	█
4	Reporting	As Needed																█				█							

Tentative targets:

- ➔ Preliminary results presented in mid-June
- ➔ Final report ready by mid-July
- ➔ Iterate on program design through end of summer

# Stakeholder questions

- What other metrics or outputs is the group interested in learning about through this assessment?
- Other than funding, what constraints should we consider when thinking of program design proposals - e.g. agency capacity/processes, outreach?

# HB 2475 3<sup>rd</sup> Workshop



## Update to Idaho Power's Project Share

Oregon 2021-2022 Program Year

Maximum Annual Benefit

**\$296**

Average  
Bill  
Assistance

**\$300 → \$450**

For increased convenience, Baker County residents are now able to receive Project Share pledges via Community Connection of Northeast Oregon

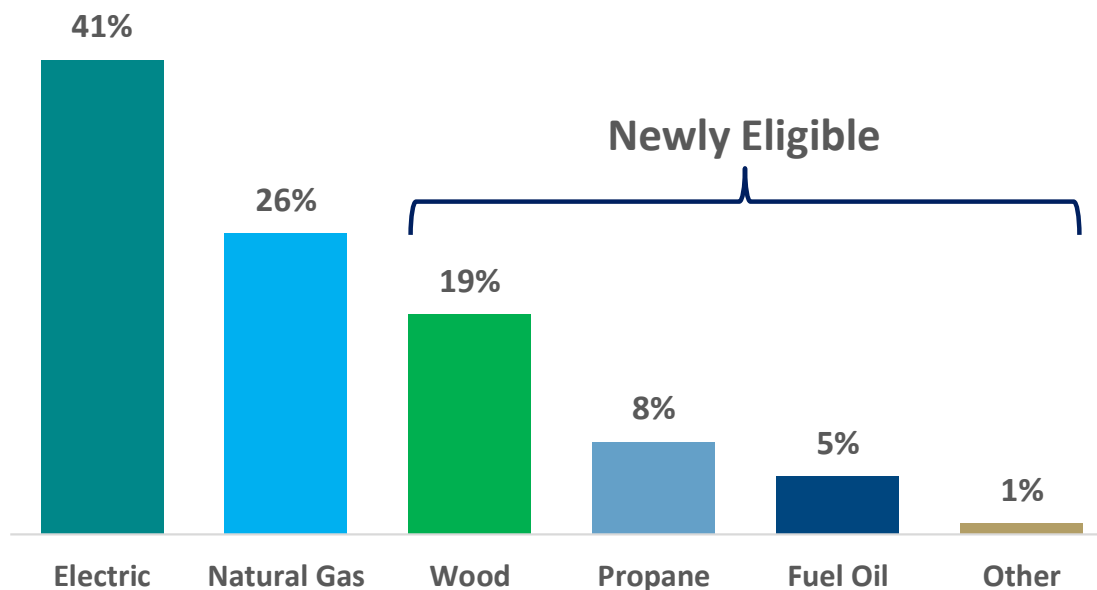
# HB 2475 3<sup>rd</sup> Workshop



## Proposed Weatherization Program Eligibility Expansion

Allow low-income customers to participate if their primary heat source is a non-metered fuel type but they use electric heating as a back-up/secondary heat source.

Residential Customers' Primary Heat Source, based on Idaho Power's 2022 Residential End-Use Survey Results





# HB 2475 3<sup>rd</sup> Workshop



## Customer Engagement Channels and Forums

- 1 Present at Community in Action's Energy Education Classes and various local senior centers and discuss:
  - Energy efficiency opportunities
  - Bill comprehension
  - Other available programs (LIHEAP, Project Share, Weatherization, etc.)
  - Q&A
- 2 Inclusion of Energy Efficiency packets in Meals on Wheels boxes
- 3 Annual Attendance at Malheur County Fair



# Discussion

# **ATTACHMENT 4**

# HB 2475 Workshop

September 2023



# HB 2475 4<sup>th</sup> Workshop



## Agenda

- 1) Introductions and Recap
- 2) Oregon Low Income Needs Assessment's Findings
- 3) Idaho Power's HB 2475 Low Income Bill Assistance Framework
- 4) Discussion

# Introductions



# HB 2475 4<sup>th</sup> Workshop



## March 2023 HB 2475 Workshop Recap

- Reached alignment that Low Income Needs Assessment (LINA) would best inform a future Idaho Power HB 2475 program proposal
  - level of targeted assistance
  - eligibility criteria
- Timeline
  - LINA to be completed in 3<sup>rd</sup> Qtr 2023
  - Reconvene stakeholders with results

# HB 2475 4<sup>th</sup> Workshop



Idaho Power's Low Income Needs Assessment

empower  
dataworks



# HB 2475 4<sup>th</sup> Workshop



## HB 2475 Low-income Bill Assistance Framework

Program eligibility is based on household income and energy burden

- Household Income:  $\leq 60\%$  of State Median Income (SMI), adjusted for household size
- Energy Burden:  $>6\%$  for electrically heated homes and  $>3\%$  for non-electrically heated homes

Customers may enroll and provide self-certified household income via the following methods:

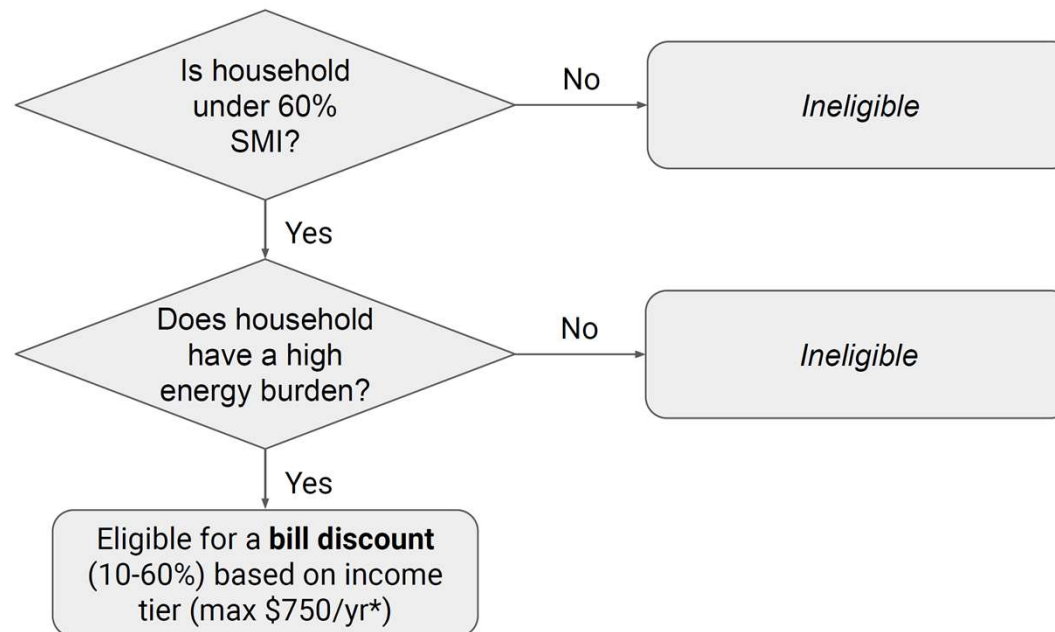
- Calling Idaho Power and speaking with a Customer Service Representative
- Through a local CAP Agency or other participating Community Based Organization (CBO), both of which would utilize an online portal to enroll customers

# HB 2475 4<sup>th</sup> Workshop



## HB 2475 Low-income Bill Assistance Framework

### Program Eligibility - with energy burden



# HB 2475 4<sup>th</sup> Workshop



## HB 2475 Low-income Bill Assistance Framework

			No minimum benefit provided		Minimum benefit provided		
Adjusted Household Income (% of SMI)	Discount %	Avg. Annual Discount Amount <sup>1</sup>	Estimated Participants <sup>2</sup>	Approximate Annual Discount Cost <sup>1,2</sup>	Annual Min. Benefit Amount	Estimated Participants <sup>2</sup>	Approximate Annual Discount Cost <sup>1,2</sup>
0-20%	60%	\$647	546	\$353,000	\$200	593	\$363,000
20-40%	25%	\$365	798	\$291,500	\$150	1,502	\$397,000
40-60%	10%	\$152	396	\$60,000	\$100	1,858	\$206,000
		<b>\$307</b>	<b>1,740</b>	<b>\$704,500</b>		<b>3,953</b>	<b>\$966,000</b>

<sup>1</sup> Estimated assuming a \$750/yr. maximum benefit amount.

<sup>2</sup> Assumes 50% participation among eligible customers.

<sup>3</sup> Assumes a \$1000/mo. bill cap for non-residential customers.

Estimated Residential Customer Monthly Bill Increase<sup>3</sup>:  
**\$1.73 (1.29%)**

Estimated Residential Customer Monthly Bill Increase<sup>3</sup>:  
**\$2.46 (1.83%)**

# HB 2475 4<sup>th</sup> Workshop



## HB 2475 Low-income Bill Assistance Framework - details

- Current LIHEAP Participants will automatically be enrolled in program, or enrollment can occur simultaneous with LIHEAP application
- Re-enrollment would occur every 2 years
- CAP Agencies and CBOs will be paid for their efforts enrolling customers in the program
- Idaho Power will conduct a post-enrollment survey of participants and of CAP Agencies
- Idaho Power may facilitate post-enrollment income verification
  - sample of participating customers
  - excludes participants who received LIHEAP
- Program risk-free to customers
- Idaho Power will report on monthly metrics
- Idaho Power will track and provide reporting of costs on a quarterly basis

# HB 2475 4<sup>th</sup> Workshop



## HB 2475 Low-income Bill Assistance Framework - Recap

- **Eligibility Criteria**
  - Income ( $\leq 60\%$  of State Median Income (SMI), adjusted for household size)
  - Energy burden ( $>6\%$  for electrically heated homes and  $>3\%$  for non-electrically heated)
- **Program Discounts**
  - 0-20% SMI – 60%
  - 20-40% SMI – 25%
  - 40-60% SMI – 10%
- **Enrollment Process**
  - Customers may self certify income
  - Through Idaho Power or participating CAP Agencies and CBOs
- **Maximum benefit of \$750**
- **Other?**

# Next Steps

# **ATTACHMENT 5**

# HB 2475 Workshop

November 2023





# HB 2475 5<sup>th</sup> Workshop



## Agenda

- 1) Introductions
  - *Please add your name and organization to the chat!*
  - General Rate Case timing and plan for seeking approval of Low-Income Bill Assistance Program
- 2) Recap of last Workshop
- 3) Recap of Stakeholder Feedback
- 4) Idaho Power's HB 2475 Low-Income Bill Assistance Program Proposal
- 5) Expansion of Idaho Power's Weatherization Program
- 6) Open discussion and Next Steps

# HB 2475 5<sup>th</sup> Workshop



## September 2023 HB 2475 Workshop Recap

- Low Income Needs Assessment (LINA) results shared
- Low-income bill assistance framework presented
- Requested stakeholders' written feedback



### HB 2475 Low-income Bill Assistance Framework - Recap

- Eligibility Criteria
  - Income ( $\leq 60\%$  of State Median Income (SMI), adjusted for household size)
  - Energy burden ( $>6\%$  for electrically heated homes and  $>3\%$  for non-electrically heated)
- Program Discounts
  - 0-20% SMI – 60%
  - 20-40% SMI – 25%
  - 40-60% SMI – 10%
- Enrollment Process
  - Customers may self certify income
  - Through Idaho Power or participating CAP Agencies and CBOs
- Maximum benefit of \$750
- Other?

# HB 2475 5<sup>th</sup> Workshop



## Written Stakeholder Feedback Received

### General support for:

- Program eligibility based on customers' household income and estimated energy burden
- Bill discount ranging from 10-60%, based on household income
- Enrollment available through Idaho Power and local CAP Agencies and/or CBOs

### Program Considerations:

- Remove the proposed \$750 maximum annual benefit cap
- Remove auto-enrollment for LIHEAP recipients
- No cost recovery cap for non-residential customers

### Future Considerations:

- Include an arrearage management component
- Address low-income weatherization
- Ensure reporting of performance metrics

# HB 2475 5<sup>th</sup> Workshop



## Idaho Power's HB 2475 Low-income Bill Assistance Program Proposal

### Eligibility Criteria:

- Income ( $\leq 60\%$  of State Median Income (SMI), adjusted for household size)
- Energy burden ( $>6\%$  for electrically heated homes and  $>3\%$  for non-electrically heated)

### Program Discounts:

- 0-20% SMI – 60%
- 20-40% SMI – 25%
- 40-60% SMI – 10%
- No annual benefit cap

### Enrollment Process:

- Customers may self-certify income
- Through Idaho Power or participating CAP Agencies and/or CBOs
- No automatic enrollment for LIHEAP recipients

# HB 2475 5<sup>th</sup> Workshop



## HB 2475 Low-income Bill Assistance Framework

				X \$750 Max Annual Benefit		✓ No Max Annual Benefit	
Adjusted Household Income (% of SMI)	Discount %	Estimated Participants <sup>1</sup>	Avg. Annual Power Bill	Avg. Annual Discount Amount <sup>1</sup>	Approximate Annual Discount Cost <sup>1,2</sup>	Avg. Annual Discount Amount <sup>1</sup>	Approximate Annual Discount Cost <sup>1,2</sup>
0-20%	60%	546	\$1,497	\$647	\$353,000	\$898	\$490,500
20-40%	25%	798	\$1,931	\$365	\$291,500	\$483	\$385,000
40-60%	10%	396	\$2,537	\$152	\$60,000	\$254	\$100,500
		<b>1,740</b>		<b>\$307</b>	<b>\$704,500</b>	<b>\$437</b>	<b>\$976,000</b>

<sup>1</sup> Assumes 50% participation among eligible customers.

<sup>2</sup> Does not include administration costs

# HB 2475 5<sup>th</sup> Workshop



## Idaho Power's HB 2475 Low-income Bill Assistance Program Proposal

Assuming an annual program cost of \$976,000 (50% participation):

Customer Class	No. of Customers	Non-residential \$1K/mo. Bill Cap <span style="color:red">X</span>		Non-residential \$2K/mo. Bill Cap <span style="color:green">✓</span>		Non-residential 1%/mo. Bill Cap <span style="color:red">X</span>		No Cost Recovery Cap <span style="color:red">X</span>	
		% of Funding	\$ Bill Increase	% of Funding	\$ Bill Increase	% of Funding	\$ Bill Increase	% of Funding	\$ Bill Increase
Residential (Schs. 1& 5)	13,691	43.4%	\$2.58/mo.	39.3%	\$2.34/mo.	50.9%	\$3.02/mo.	31.5%	\$1.87/mo.
Small General (Sch. 7)	2,720	4.9%		4.4%		2.5%		3.6%	
Large General (Sch. 9)	955	26.5%		24.0%		13.8%		19.2%	
Large Power (Sch. 19)	7	8.6%	0.11¢/kWh	17.2%	0.12¢/kWh	24.2%	0.09¢/kWh	33.7%	0.13¢/kWh
Agricultural (Sch. 24)	2,222	16.0%		14.5%		8.3%		11.6%	
Other	38	0.5%		0.6%		0.3%		0.4%	
<b>Total</b>	<b>19,633</b>								

# HB 2475 5<sup>th</sup> Workshop



## Idaho Power's HB 2475 Low-income Bill Assistance Program Proposal

### Program Details – *enrollment and participation*

- Participants re-enroll every 2 years
- CAP Agencies and/or Community Based Organizations (CBOs) will be paid for their efforts enrolling customers in the program
- Post-enrollment survey of participants and enrolling CAP Agencies/CBOs will be conducted
- Idaho Power may conduct post-enrollment income verification
  - sample of participating customers
- Program is risk-free to participants

# HB 2475 5<sup>th</sup> Workshop



## Idaho Power's HB 2475 Low-income Bill Assistance Program Proposal

### Program Details – *tracking and reporting*

- Idaho Power will track and provide reporting of costs on a quarterly basis
- Idaho Power will report on monthly metrics on a quarterly basis
  - Average assistance amount per participant
  - Arrears, by age, per participant
  - Whether participants have received energy assistance within the recent 12 mos.
  - Others?

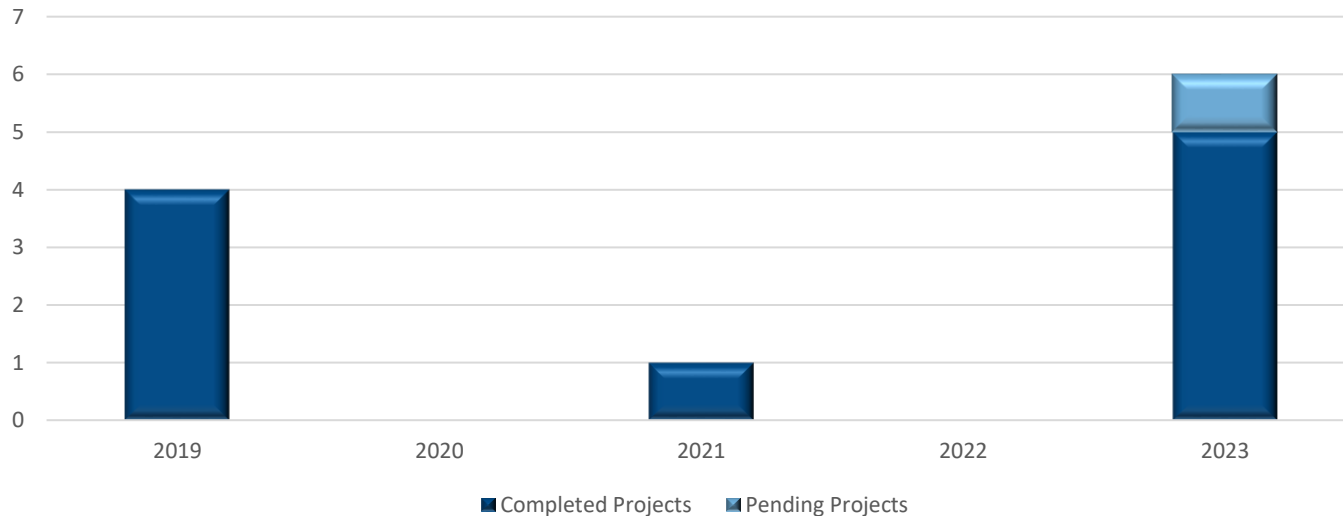


# HB 2475 5<sup>th</sup> Workshop



## Proposed Changes to Existing Weatherization Program

### Idaho Power's Oregon Customer Weatherization Projects



# HB 2475 5<sup>th</sup> Workshop



## Proposed Changes to Existing Weatherization Program

### Weatherization Barriers

Eligibility

Resources

# HB 2475 5<sup>th</sup> Workshop

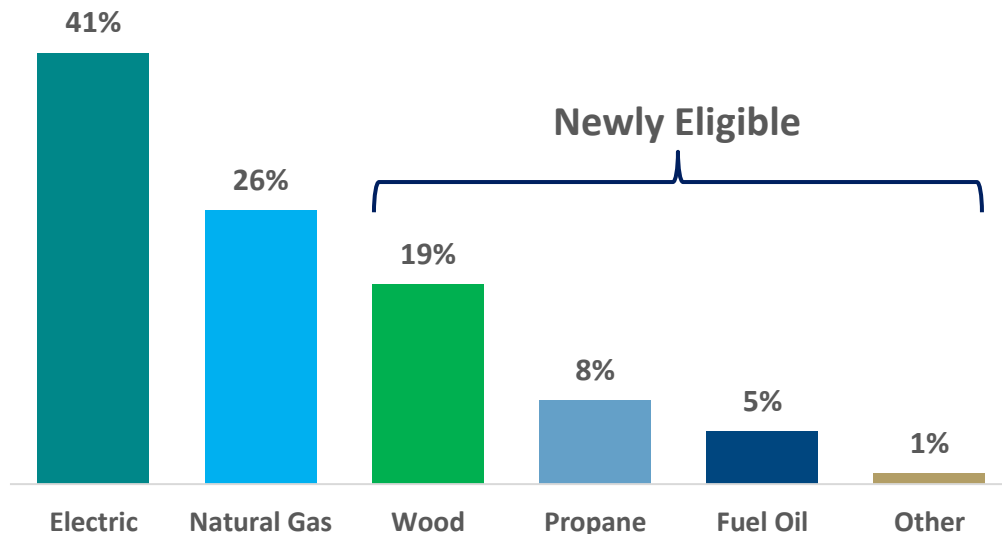


## Proposed Changes to Existing Weatherization Program

### WAQC Eligibility Criteria Changes

- Allow low-income customers to participate if their primary heat source is a non-metered fuel type but they use electric heating as a back-up/secondary heat source.

**Residential Customers' Primary Heat Source, based on Idaho Power's 2022 Residential End-Use Survey Results**



# HB 2475 5<sup>th</sup> Workshop



## Proposed Changes to Existing Weatherization Program

### New Weatherization Program proposal

- 100% Idaho Power Funded (through existing Energy Efficiency Rider)
- Increased Administration Payments
- Work with CAP Agencies to identify and remove barriers associated with federal funding such as:
  - Project caps
  - Contractor requirements
  - Contractor availability

# Next Steps

- File Bill Discount Program as part of General Rate Case
- File updates to weatherization program
- File updates in UM 2211

# **ATTACHMENT 6**

**TOPIC OR KEYWORD: Low-Income Weatherization**

**STAFF'S DATA REQUEST NO. 267:**

Please provide:

- a. A list of bill payment support programs offered by the Company.
- b. How many customers are receiving support from these programs in Oregon and Idaho for the last five years.
- c. The overall funding of each program for customers in Oregon and Idaho respectively for the last five years.
- d. Percentage of low-income customers residing in each state that have received support.

**IDAHO POWER COMPANY'S RESPONSE TO STAFF'S DATA REQUEST NO. 267:**

- a. Project Share is Idaho Power's bill payment support program offered by the Company. In addition to this bill payment support program, customers may call into the Customer Service Center to set up payment arrangements, to qualify for the Winter Protection Program, or to receive energy efficiency information. Customers may also be connected with an Idaho Power Energy Advisor to discuss high bills and energy efficiency opportunities. Customer Service Center representatives will also connect customers with Community Action Partnership Agencies for financial support as needed. Idaho Power has also proposed Schedule 63, Bill Discount for Qualified Customers Program ("Schedule 63") as part of this General Rate Case in response to HB 2475 in Oregon. For additional detail on the proposed Schedule 63, please reference the direct testimony of C. Aschenbrenner pages 25-35 in this Docket, UE 426.
- b. Number of Customers receiving Project Share support by State over the last five years.

Program Year	Number of Customers		
	Oregon	Idaho	Total
<b>2018/2019</b>	33	1,063	1,096
<b>2019/2020</b>	24	936	960
<b>2020/2021</b>	25	736	761
<b>2021/2022</b>	23	1,338	1,361
<b>2022/2023</b>	50	1,379	1,429

- c. Overall Project Share funding by State over the last five years.

Program Year	Overall Program Funding by State		
	Oregon	Idaho	Total
<b>2018/2019</b>	\$7,250	\$247,750	\$255,000
<b>2019/2020</b>	\$8,820	\$285,680	\$294,500
<b>2020/2021</b>	\$7,350	\$239,900	\$247,250
<b>2021/2022</b>	\$10,875	\$314,925	\$325,800
<b>2022/2023</b>	\$16,100	\$413,900	\$430,000

- d. According to the Company's Low Income Needs Assessment ("LINA") conducted for Idaho Power's Oregon service area in 2023, approximately 19 percent of the 12,800

residential customers in Oregon at the time (or 2,432 customers) would fall under the 100 percent of the federal poverty limit, and 62 percent of the 2,800 residential customers (or 7,936 customers) would fall under 60 percent of State Median Income. Using these approximations, 2 percent of customers in Oregon that fall under the 100 percent of federal poverty limit and 0.6 percent of the customers in Oregon that fall under 60 percent of State Median Income received assistance from Project Share in the 2022/2023 program year. Idaho Power has not conducted a LINA in Idaho, however, utilizing five-year census data through 2021, approximately 53,000 residential households in Idaho would fall under the 100 percent of the federal poverty limit. Using this assumption, 2.6 percent of Idaho customers that fall under the 100 percent federal poverty limit received assistance from Project Share in the 2022/2023 program year.



**Topic or Keyword: Bill Discount Program**

**STAFF'S DATA REQUEST NO. 282:**

As it pertains to IPCO's proposed bill discount program:

- a. Please provide the number of residential customers in IPCO's Oregon service territory on a monthly basis for 2022-2024.
- b. How many customers does IPCO estimate are able to qualify for the program? Please provide a breakdown by discount tier.
- c. How many of IPCO's residential customers are currently receiving LIHEAP?
- d. Provide an estimate of the number of customers IPCO believes will be enrolled into the Bill Discount Program by the end of the calendar years 2024, 2025 and 2026, by discount tier. Please summarize the methodology used to arrive at these figures.
- e. Provide a forecast of the total cost associated with the Bill Discount Program for the calendar years 2024, 2025, and 2026. Please provide a breakdown of cost categories. Please summarize the methodology used to arrive at these figures.
- f. Please describe how the Company plans to monitor the kWh usage of Bill Discount Program participants for outliers. If there are no plans to monitor please explain why.
- g. Please provide the monthly average kwh usage for all residential customers for 2022-2024. Please provide a breakdown of average monthly kwh usage for LIHEAP customers for the same time period. Please provide a breakdown by dwelling type.
- h. Please explain in greater detail the Company's reasoning for not including automatic enrollment of LIHEAP customers into the Bill Discount Program. Please cite any materials that show this was the intention of stakeholders.
- i. Please explain in greater detail the Company's reasoning for the inclusion of cost cap for non-residential customers. Please explain in greater detail how the Company arrived at a \$2,000 cap. Please provide any analysis conducted by the Company.

**RESPONSE TO STAFF'S DATA REQUEST NO. 282:**

- a. Please see Response to Staff's Request No. 282 – Attachment 1.
- b. Please see Response to Staff's Request No. 282 – Attachment 2.
- c. In 2023, 1,262 Oregon customers were reported as receiving LIHEAP or some form of energy assistance.
- d. The Company has not attempted to forecast the number of customers estimated to be enrolled in the proposed Bill Discount Program following its implementation due to qualifying customers having to optionally request to enroll in the program. Because customers have to optionally request to enroll, that, amongst other factors outside of the Company's control, creates a number of uncertainties which currently result in the Company being unable to reasonably forecast potential enrollment without first having some level of experience with administering this type of a program.

- e. At a 100 percent program saturation rate amongst eligible customers, the Company has estimated, based on the findings of its recently completed Low Income Needs Assessment ("LINA"), the current annual program funding requirements, not including administration costs, to be approximately \$1.7 million, as shown within Response to Staff's Request No. 282 – Attachment 2. Because the Company believes not all eligible customers will enroll in the program right away, it chose a more conservative program saturation rate of 25 percent, weighted by 2022 LIHEAP participation for customers estimated to be within one of the three discount tiers, on which to initially base its proposed cost recovery mechanism. Recognizing that the program's annual funding requirement is inherently tied to customers' participation in this optional program, the Company has requested approval of a balancing account to allow for the appropriate matching and recovery of the program's benefits and costs.
- f. An internal process currently exists where kWh usage is systematically monitored to evaluate whether the kWh usage dramatically exceeds historical norms. In the event this occurs, a notification is created so that further review of the situation, including a site visit to the premises, may occur by a Company representative to ensure the meter is functioning correctly and/or associated with the appropriate rate schedule.
- g. Please see the file labeled Response to Staff Request No. 282 – Attachment 3. Dwelling types are broken out by single family ("SF"), multifamily ("MF"), manufactured homes ("Manuf"), other/unknown for all residential customers, inclusive of LIHEAP recipients. Separately broken out within this attachment is LIHEAP recipients' average monthly usage irrespective of dwelling type.

As noted within the Company's response to Staff's Request No. 281c, the Company does not routinely systematically track or update the dwelling types of its residential customers and, as such, the provided average kWh figures for the various dwelling types should be considered as estimates and used for informational purposes only.

- h. The Company's proposed Bill Discount Program takes into account customers' energy burden to determine eligibility. Because receipt of energy assistance, such as LIHEAP, may solely reduce a customer's energy burden to below the eligibility thresholds proposed by the Company (greater than 3 percent for non-electrically heated homes, or greater than 6 percent for electrically heated homes), stakeholders requested within their comments submitted on September 29, 2023, in Docket UM 2211 that, "IP should only auto-enroll energy assistance recipients after ascertaining if they are energy burdened." As such, the Company elected to not move forward with auto-enrollment of LIHEAP recipients within its proposed Bill Discount Program. Instead, these customers' eligibility, based on estimated energy burden net of receipt of energy assistance funds, will be determined upon their request to enroll or re-enroll in the program.

- i. Implementing a cost recovery cap of \$2,000 for all nonresidential customer classes is based on the assumptive 25 percent program saturation rate, as mentioned above. When taking into consideration the Company's unique and comparatively small service area, the Company is concerned with not limiting the amount non-residential customers may be required to contribute towards a program that does not enhance or otherwise provide benefit to their receipt of electrical service. As a result, the Company believes the monthly bill cap within its proposed Schedule 64 strikes an appropriate balance between stakeholder feedback received to date, the requirement that all customer classes contribute towards the cost of the Company's proposed Bill Discount Program, and directing a majority of the program's long-term funding requirements towards the customer class able to benefit from such program. That said, the Company expects refinement and potential adjustment of the program's actual annual funding requirements, including any needed modification to the monthly bill cap applicable to non-residential classes, to occur following commencement of customer enrollment and maturity of the program.

**Count of Oregon Residential Customers<sup>1</sup>**

	<b>2022</b>	<b>2023</b>	<b>2024</b>
January	13,791	13,968	N/A
February	13,781	13,973	N/A
March	13,777	13,971	N/A
April	13,841	13,969	N/A
May	13,847	13,995	N/A
June	13,868	13,985	N/A
July	13,915	13,991	N/A
August	13,933	13,994	N/A
September	13,951	14,073	N/A
October	13,944	14,083	N/A
November	13,960	14,065	N/A
December	13,955	14,076	N/A

<sup>1</sup> Customer count is the count of active contracts (service agreements) during the respective month, as reported within the Company's Monthly Credit and Collections data submitted within Docket No. RE 187.

	<b>Adjusted Household Income</b>	<b>Discount Towards Eligible Charges</b>	<b>Number of Potential Eligible Customers<sup>1</sup></b>	<b>Avg. Annual Power Bill</b>	<b>Avg. Annual Discount Amount</b>	<b>Approximate Annual Discount Cost</b>
Tier 1	up to 20% SMI	60% discount	<b>842</b>	\$1,497	\$898	<b>\$ 756,284</b>
Tier 2	>20% up to 40% SMI	25% discount	<b>1,407</b>	\$1,931	\$483	<b>\$ 679,229</b>
Tier 3	>40% up to 60% SMI	10% discount	<b>926</b>	\$2,537	\$254	<b>\$ 234,926</b>
<b>Total</b>			<b>3,175</b>	<b>\$1,993</b>		<b>\$ 1,670,440</b>

<sup>1</sup> Number of potential eligible customers is based upon the findings of the Company's recently completed Low Income Needs Assessment.

Response to Staff Request No. 282 - Attachment 3

billmonth	SF_Avg_kWh	MF_Avg_kWh	Manuf_Avg_kWh	Other_Unkwn_Avg_kWh	All_Cust_Avg_kWh	LIHEAP_Avg_kWh	LIHEAP_Bill_Count
1/1/2022	1,756	1,258	2,002	1,547	1,735	1,754	1,110
2/1/2022	1,676	1,230	1,931	1,483	1,662	1,708	1,115
3/1/2022	1,487	1,081	1,677	1,317	1,466	1,511	1,116
4/1/2022	1,027	685	1,090	876	991	1,003	1,122
5/1/2022	1,008	656	1,037	848	963	979	1,124
6/1/2022	866	527	811	711	807	791	1,121
7/1/2022	1,085	635	936	856	991	937	1,117
8/1/2022	1,438	831	1,207	1,110	1,305	1,215	1,113
9/1/2022	1,274	752	1,076	993	1,157	1,093	1,111
10/1/2022	815	493	737	650	752	743	1,097
11/1/2022	1,053	672	1,156	876	1,015	1,031	1,086
12/1/2022	1,680	1,204	1,929	1,444	1,653	1,727	1,078
1/1/2023	1,774	1,260	2,001	1,533	1,738	1,895	1,019
2/1/2023	1,594	1,123	1,814	1,414	1,566	1,681	1,023
3/1/2023	1,545	1,123	1,739	1,337	1,516	1,645	1,029
4/1/2023	1,232	834	1,343	1,062	1,194	1,250	1,033
5/1/2023	937	593	931	765	883	901	1,037
6/1/2023	926	570	815	722	849	830	1,034
7/1/2023	1,061	632	910	813	965	926	1,032
8/1/2023	1,311	788	1,102	1,015	1,190	1,124	1,027
9/1/2023	1,074	679	901	817	977	949	1,016
10/1/2023	810	496	741	641	748	741	1,006
11/1/2023	996	654	1,050	746	947	981	998
12/1/2023	1,427	1,004	1,580	1,117	1,381	1,461	992

**TOPIC OR KEYWORD: Bill Discount Program**

**STAFF'S DATA REQUEST NO. 450:**

A) What other cost recovery mechanisms or models has the Company considered, including but not limited to percentage of bill cost recovery? B) Please provide any analysis the company has done to compare the differences between cost recovery mechanism.

**IDAHO POWER COMPANY'S RESPONSE TO STAFF'S DATA REQUEST NO. 450:**

- A. When developing its proposal, the Company considered a percent of bill or dollar cap cost recovery mechanism amounts for its non-residential customers. However, as described on page 34 in the Direct Testimony of Connie G. Aschenbrenner, the Company ultimately decided to move forward with proposing a dollar cap cost recovery mechanism amount of \$2,000 because it sought to strike an appropriate balance between all customers required to contribute towards the cost of the Company's proposed Bill Discount Program (as mandated within Section 7 of House Bill 2475), while directing a majority of the program's long-term funding requirements (as the program matures) towards the customer class that benefits from such program.
- B. Please see Response to Staff Request No. 450 – Attachment for the workbook used by the Company to compare the differences between various percent of bill, cost allocation and dollar cap cost recovery mechanism allocation structures and amounts.

**TOPIC OR KEYWORD: Bill Discount Program**

**STAFF'S DATA REQUEST NO. 451:**

Based on the 2024 test year forecast, how many customers, by service schedule, would trigger the 2,460,024-kWh cap currently proposed?

**IDAHO POWER COMPANY'S RESPONSE TO STAFF'S DATA REQUEST NO. 451:**

As more thoroughly described within Appendix A of the Company's Integrated Resource Plan, filed in Docket No. LC 84, the Company's sales and load forecast is generally constructed by developing a separate energy forecast for each of the major customer segments (residential, commercial, irrigation, industrial, and Energy Service Agreements). The specifications used differ between customer segments, but generally leverages, among other possible factors, historic weather and energy efficiency data, and economic relationships for each of the respective customer segments. The resulting forecasted sales and load amounts are then proportioned to each rate schedule and associated jurisdiction based on historical usage.

Because customers' usage is not individually forecasted, the Company is unable to identify exactly how many customers, by service schedule, might trigger the monthly 2,460,024-kWh cap currently proposed as part of Schedule 64. However, based on non-residential customers' actual 2023 usage amounts, only three customers would have exceeded the monthly 2,460,024-kWh cap at some point(s) during 2023.



**TOPIC OR KEYWORD: Bill Discount Program**

**STAFF'S DATA REQUEST NO. 452:**

A: Please provide the cost recovery rate spread and average monthly cost (and workpapers) if Idaho Power were to implement a percentage of bill cost recovery cap at each of: 2% 3% 4% and 5%. B) In the response please provide the maximum dollar amount a customer would pay under this methodology within each service schedule.

**IDAHO POWER COMPANY'S RESPONSE TO STAFF'S DATA REQUEST NO. 452:**

- A. Please see Response to Staff Request No. 452 – Attachment for the workpaper showing the cost recovery rate spread and each customer class's average monthly bill increase at the stated percent of bill cost recovery caps. Please note that the percent of bill amount can be adjusted using the drop-down menu within cell D1.
- B. Assuming the Company's Bill Discount Program's annual funding requirements and associated cost allocation methodology made it possible for the Company's largest customers to trigger the various percent of bill cost recovery cap amounts suggested, the Company estimates, using customers' actual 2023 billing information, the approximate maximum dollar amount a customer would pay under this cost recovery methodology to be as follows:
- 2 percent monthly bill cap - \$17,300/mo.
  - 3 percent monthly bill cap - \$26,000/mo.
  - 4 percent monthly bill cap - \$34,600/mo.
  - 5 percent monthly bill cap - \$43,200/mo.

**TOPIC OR KEYWORD: Bill Discount Program**

**STAFF'S DATA REQUEST NO. 453:**

Based on the 2024 test year forecast, how many customers, by service schedule, would trigger the \$2,000 effective monthly cap if the Company were to implement a percentage of bill cost recovery mechanism at each of 2%, 3%, 4%, and 5%.

**IDAHO POWER COMPANY'S RESPONSE TO STAFF'S DATA REQUEST NO. 453:**

As previously noted within the Company's response to Staff's Data Request No. 451, the Company does not forecast individual customers' usage as part of developing its test year's sales and load forecast. However, using customers' actual 2023 billing data, the following number of customers would have triggered a \$2,000 effective monthly cap, at some point(s) during the year, at the suggested percent of bill cost recovery amounts.

- 2 percent monthly bill cap – 8 customers
- 3 percent monthly bill cap – 10 customers
- 4 percent monthly bill cap – 11 customers
- 5 percent monthly bill cap – 11 customers

**Monthly Percent of Bill Increase Scenario:**

Non-residential Mo. Bill Cap Amount:	1.00%
Program Saturation Percentage	25%
Annual Program Costs (estimated at full participation) - Scenario 1	\$ 1,952,000.00
Annual Program Costs (estimated at full participation) - Scenario 2	\$ 1,500,000.00
Allocate to non-res. before res. Customers	No

**Monthly Dollar Cap Scenario:**

Non-residential Mo. Bill Cap Amount:	\$ 2,000.00
Program Saturation Percentage	25%
Annual Program Costs (estimated at full participation) - Scenario 1	\$ 1,952,000.00
Annual Program Costs (estimated at full participation) - Scenario 2	\$ 1,500,000.00

Non-residential Mo. Bill Cap Amount:	1.00%
Program Saturation Percentage	25.00%
Annual Program Costs (estimated at full participation) - Scenario 1	\$ 1,892,000.00
Annual Program Costs (estimated at full participation) - Scenario 2	\$ 1,500,000.00
Allocate to non-res. before res. Customers	No

Monthly Bill Increase - All Classes (Increase of \$488,000) @ 25% Enrollment - Scenario 1

Class	Sch.	Avg Customer	Billed Revenue	Energy kWh	Energy Proportion	Class Program Funding Requirements, Based on Energy Proportion (no cap)	% Change Billed (no cap)	Class Funding with non-res. 1.0% Mo. Cap.	% Change, Billed Rev 1.0% Mo. Cap.	Remaining Program \$ Reallocated to Non-capped Classes	Total Class Program Funding Requirements with Reallocation	% Change Billed	Proportion of Program Funding (with cap)	kWh Rate per Class	Avg. Monthly Bill Increase	Flat Cust. & kWh Increase
Residential Service	1 & 5	13,816	\$ 23,196,593	193,062,091	28.4%	\$ 138,630	0.598%	\$ 138,630	0.598%	\$ -	\$ 138,630	0.598%	28.4%	0.000718059	\$ 0.84	\$ 0.84
Small General Service	7	2,727	\$ 2,643,320	20,119,638	3.0%	\$ 14,447	0.547%	\$ 14,447	0.547%	\$ -	\$ 14,447	0.547%	3.0%	0.000718059	\$ 0.44	\$ 0.0007180
Large General Service	9	962	\$ 13,290,040	130,166,972	19.2%	\$ 93,468	0.703%	\$ 93,468	0.703%	\$ -	\$ 93,468	0.703%	19.2%	0.000718059	\$ 8.09	\$ 0.0007180
Large Power Service	19	6	\$ 22,991,653	268,724,111	39.5%	\$ 192,960	0.839%	\$ 192,960	0.839%	\$ -	\$ 192,960	0.839%	39.5%	0.000718059	\$ 2,505.97	\$ 0.0007180
Agricultural Irrigation Service	24	2,298	\$ 3,249,579	66,669,479	9.8%	\$ 47,873	0.580%	\$ 47,873	0.580%	\$ -	\$ 47,873	0.580%	9.8%	0.000718059	\$ 1.74	\$ 0.0007180
Unmetered General Service	40	2	\$ 474	5,388	0.0%	\$ 4	0.817%	\$ 4	0.817%	\$ -	\$ 4	0.817%	0.0%	0.000718059	\$ 0.16	\$ 0.0007180
Street Lighting	41	27	\$ 162,552	461,927	0.1%	\$ 332	0.204%	\$ 332	0.204%	\$ -	\$ 332	0.204%	0.1%	0.000718059	\$ 1.02	\$ 0.0007180
Traffic Control Lighting	42	11	\$ 9,909	22,985	0.0%	\$ 17	0.567%	\$ 17	0.567%	\$ -	\$ 17	0.567%	0.0%	0.000718059	\$ 0.13	\$ 0.0007180
<b>Total Uniform Tariffs</b>		<b>19,849</b>	<b>\$ 70,658,638</b>	<b>679,609,806</b>	<b>100.0%</b>	<b>\$ 488,000</b>		<b>\$ 488,000</b>		<b>\$ -</b>	<b>\$ 488,000</b>	<b>0.691%</b>	<b>100.0%</b>	<b>0.000718059</b>	<b>\$ 2.05</b>	<b>\$ 0.0007180</b>

Monthly Bill Increase - All Classes (Increase of \$375,000) @ 25% Enrollment - Scenario 2

Class	Sch.	Avg Customer	Billed Revenue	Energy kWh	Energy Proportion	Class Program Funding Requirements, Based on Energy Proportion (no cap)	% Change Billed (no cap)	Class Funding with non-res. 1.0% Mo. Cap.	% Change, Billed Rev 1.0% Mo. Cap.	Remaining Program \$ Reallocated to Non-capped Classes	Total Class Program Funding Requirements with Reallocation	% Change Billed	Proportion of Program Funding (with cap)	kWh Rate per Class	Avg. Monthly Bill Increase	Flat Cust. & kWh Increase
Residential Service	1 & 5	13,816	\$ 23,196,593	193,062,091	28.4%	\$ 106,529	0.459%	\$ 106,529	0.459%	\$ -	\$ 106,529	0.459%	28.4%	0.00051787	\$ 0.64	\$ 0.64
Small General Service	7	2,727	\$ 2,643,320	20,119,638	3.0%	\$ 11,102	0.420%	\$ 11,102	0.420%	\$ -	\$ 11,102	0.420%	3.0%	0.00051787	\$ 0.34	\$ 0.0005520
Large General Service	9	962	\$ 13,290,040	130,166,972	19.2%	\$ 71,824	0.540%	\$ 71,824	0.540%	\$ -	\$ 71,824	0.540%	19.2%	0.00051787	\$ 6.22	\$ 0.0005520
Large Power Service	19	6	\$ 22,991,653	268,724,111	39.5%	\$ 148,279	0.645%	\$ 148,279	0.645%	\$ -	\$ 148,279	0.645%	39.5%	0.00051787	\$ 1,921.70	\$ 0.0005520
Agricultural Irrigation Service	24	2,298	\$ 3,249,579	66,669,479	9.8%	\$ 36,787	0.446%	\$ 36,787	0.446%	\$ -	\$ 36,787	0.446%	9.8%	0.00051787	\$ 1.33	\$ 0.0005520
Unmetered General Service	40	2	\$ 474	5,388	0.0%	\$ 3	0.628%	\$ 3	0.628%	\$ -	\$ 3	0.628%	0.0%	0.00051787	\$ 0.12	\$ 0.0005520
Street Lighting	41	27	\$ 162,552	461,927	0.1%	\$ 255	0.157%	\$ 255	0.157%	\$ -	\$ 255	0.157%	0.1%	0.00051787	\$ 0.79	\$ 0.0005520
Traffic Control Lighting	42	11	\$ 9,909	22,985	0.0%	\$ 13	0.436%	\$ 13	0.436%	\$ -	\$ 13	0.436%	0.0%	0.00051787	\$ 0.10	\$ 0.0005520
<b>Total Uniform Tariffs</b>		<b>19,849</b>	<b>\$ 70,658,638</b>	<b>679,609,806</b>	<b>100.0%</b>	<b>\$ 375,000</b>		<b>\$ 375,000</b>		<b>\$ -</b>	<b>\$ 375,000</b>	<b>0.531%</b>	<b>100.0%</b>	<b>0.00051787</b>	<b>\$ 1.57</b>	<b>\$ 0.0005520</b>

Non-residential Mo. Bill Cap Amount:	1.00%
Program Saturation Percentage	25.00%
Annual Program Costs (estimated at full participation) - Scenario 1	\$ 1,892,000.00
Annual Program Costs (estimated at full participation) - Scenario 2	\$ 1,500,000.00
Allocate to non-res. before res. Customers	No

Monthly Bill Increase - All Classes (Increase of \$488,000) @ 25% Enrollment - Scenario 1

Class	Sch.	Avg Customer	Billed Revenue	Energy kWh	Billed Revenue Proportion	Class Program Funding Requirements, Based on Billed Rev. Proportion (no cap)	% Change Billed (no cap)	Class Funding with non-res. 1.0% Mo. Cap.	% Change, Billed Rev. 1.0% Mo. Cap.	Remaining Program \$ Reallocated to Non-capped Classes	Total Class Program Funding Requirements with Reallocation	% Change Billed	Proportion of Program Funding (with cap)	kWh Rate per Class	Avg. Monthly Bill Increase	Flat Cust. & kWh Increase
Residential Service	1 & 5	13,816	\$ 23,196,593	193,062,091	32.8%	\$ 160,206	0.691%	\$ 160,206	0.691%	\$ -	\$ 160,206	0.691%	32.8%	0.000929816	\$ 0.97	\$ 0.97
Small General Service	7	2,727	\$ 2,643,320	20,119,638	3.7%	\$ 18,256	0.691%	\$ 18,256	0.691%	\$ -	\$ 18,256	0.691%	3.7%	0.000907370	\$ 0.56	\$ 0.0006970
Large General Service	9	962	\$ 13,290,040	130,166,972	18.8%	\$ 91,787	0.691%	\$ 91,787	0.691%	\$ -	\$ 91,787	0.691%	18.8%	0.000705148	\$ 7.95	\$ 0.0006970
Large Power Service	19	6	\$ 22,991,653	268,724,111	32.5%	\$ 158,791	0.691%	\$ 158,791	0.691%	\$ -	\$ 158,791	0.691%	32.5%	0.000598066	\$ 2,062.23	\$ 0.0006970
Agricultural Irrigation Service	24	2,298	\$ 3,249,579	66,669,479	11.7%	\$ 56,975	0.691%	\$ 56,975	0.691%	\$ -	\$ 56,975	0.691%	11.7%	0.000854593	\$ 2.07	\$ 0.0006970
Unmetered General Service	40	2	\$ 474	5,388	0.0%	\$ 3	0.691%	\$ 3	0.691%	\$ -	\$ 3	0.691%	0.0%	0.000607089	\$ 0.14	\$ 0.0006970
Street Lighting	41	27	\$ 162,552	461,927	0.2%	\$ 1,123	0.691%	\$ 1,123	0.691%	\$ -	\$ 1,123	0.691%	0.2%	0.002430379	\$ 3.46	\$ 0.0006970
Traffic Control Lighting	42	11	\$ 9,909	22,985	0.0%	\$ 20	0.691%	\$ 20	0.691%	\$ -	\$ 20	0.691%	0.0%	0.000873989	\$ 0.15	\$ 0.0006970
<b>Total Uniform Tariffs</b>		<b>19,849</b>	<b>\$ 70,658,638</b>	<b>679,609,806</b>	<b>100.0%</b>	<b>\$ 488,000</b>		<b>\$ 488,000</b>		<b>\$ -</b>	<b>\$ 488,000</b>	<b>0.691%</b>	<b>100.0%</b>	<b>0.000718059</b>	<b>\$ 2.05</b>	<b>\$ 0.0007180</b>

Monthly Bill Increase - All Classes (Increase of \$375,000) @ 25% Enrollment - Scenario 2

Class	Sch.	Avg Customer	Billed Revenue	Energy kWh	Billed Revenue Proportion	Class Program Funding Requirements, Based on Billed Rev. Proportion (no cap)	% Change Billed (no cap)	Class Funding with non-res. 1.0% Mo. Cap.	% Change, Billed Rev. 1.0% Mo. Cap.	Remaining Program \$ Reallocated to Non-capped Classes	Total Class Program Funding Requirements with Reallocation	% Change Billed	Proportion of Program Funding (with cap)	kWh Rate per Class	Avg. Monthly Bill Increase	Flat Cust. & kWh Increase
Residential Service	1 & 5	13,816	\$ 23,196,593	193,062,091	32.8%	\$ 123,109	0.531%	\$ 123,109	0.531%	\$ -	\$ 123,109	0.531%	32.8%	0.000837666	\$ 0.74	\$ 0.74
Small General Service	7	2,727	\$ 2,643,320	20,119,638	3.7%	\$ 14,029	0.531%	\$ 14,029	0.531%	\$ -	\$ 14,029	0.531%	3.7%	0.000697261	\$ 0.43	\$ 0.0005350
Large General Service	9	962	\$ 13,290,040	130,166,972	18.8%	\$ 70,533	0.531%	\$ 70,533	0.531%	\$ -	\$ 70,533	0.531%	18.8%	0.000541865	\$ 6.11	\$ 0.0005350
Large Power Service	19	6	\$ 22,991,653	268,724,111	32.5%	\$ 122,021	0.531%	\$ 122,021	0.531%	\$ -	\$ 122,021	0.531%	32.5%	0.000454073	\$ 1,584.69	\$ 0.0005350
Agricultural Irrigation Service	24	2,298	\$ 3,249,579	66,669,479	11.7%	\$ 43,782	0.531%	\$ 43,782	0.531%	\$ -	\$ 43,782	0.531%	11.7%	0.000656706	\$ 1.59	\$ 0.0005350
Unmetered General Service	40	2	\$ 474	5,388	0.0%	\$ 3	0.531%	\$ 3	0.531%	\$ -	\$ 3	0.531%	0.0%	0.000466513	\$ 0.10	\$ 0.0005350
Street Lighting	41	27	\$ 162,552	461,927	0.2%	\$ 863	0.531%	\$ 863	0.531%	\$ -	\$ 863	0.531%	0.2%	0.001867607	\$ 2.66	\$ 0.0005350
Traffic Control Lighting	42	11	\$ 9,909	22,985	0.0%	\$ 15	0.531%	\$ 15	0.531%	\$ -	\$ 15	0.531%	0.0%	0.000671610	\$ 0.12	\$ 0.0005350
<b>Total Uniform Tariffs</b>		<b>19,849</b>	<b>\$ 70,658,638</b>	<b>679,609,806</b>	<b>100.0%</b>	<b>\$ 375,000</b>		<b>\$ 375,000</b>		<b>\$ -</b>	<b>\$ 375,000</b>	<b>0.531%</b>	<b>100.0%</b>	<b>0.000551787</b>	<b>\$ 1.57</b>	<b>\$ 0.0005520</b>

Non-residential Mo. Bill Cap Amount:	\$	2,000.00
Program Saturation Percentage		25%
Annual Program Costs (estimated at full participation) - Scenario 1	\$	1,952,000.00
Annual Program Costs (estimated at full participation) - Scenario 2	\$	1,500,000.00

Monthly Bill Increase - All Classes (Increase of \$488,000) @ 25% Enrollment - Scenario 1

Class	Sch.	Avg Customer	Billed Revenue	Energy kWh	Energy Proportion	Class Program Funding Requirements, Based on Energy Proportion (no cap)	% Change Billed (no cap)	Class Funding with non-res. \$2,000 Mo. Cap.	Remaining Program \$ Reallocated to Non-capped Classes	Total Class Program Funding Requirements with Reallocation	% Change Billed	Proportion of Program Funding (with cap)	kWh Rate per Class	Avg. Monthly Bill Increase	Flat Cust. & kWh Increase
Residential Service	1 & 5	13,816	\$ 23,196,593	193,062,091	28.4%	\$ 138,630	0.60%	\$ 138,630	\$ 18,306	\$ 156,936	0.68%	32.2%	0.000812878	\$ 0.95	\$ 0.95
Small General Service	7	2,727	\$ 2,643,320	20,119,638	3.0%	\$ 14,447	0.55%	\$ 14,447	\$ 1,908	\$ 16,355	0.62%	3.4%	0.000812878	\$ 0.50	\$ 0.0008130
Large General Service	9	962	\$ 13,290,040	130,166,972	19.2%	\$ 93,468	0.70%	\$ 93,468	\$ 12,347	\$ 105,815	0.80%	21.7%	0.000812878	\$ 8.16	\$ 0.0008130
Large Power Service	19	6	\$ 22,991,653	268,724,111	39.5%	\$ 192,960	0.84%	\$ 154,000	\$ -	\$ 154,000	0.67%	31.6%	0.000573078	\$ 2,000.00	\$ 0.0008130
Agricultural Irrigation Service	24	2,298	\$ 8,249,579	66,669,479	9.8%	\$ 47,873	0.58%	\$ 47,873	\$ 6,322	\$ 54,194	0.66%	11.1%	0.000812878	\$ 1.97	\$ 0.0008130
Unmetered General Service	40	2	\$ 474	5,388	0.0%	\$ 4	0.82%	\$ 4	\$ 1	\$ 4	0.92%	0.0%	0.000812878	\$ 0.18	\$ 0.0008130
Street Lighting	41	27	\$ 162,552	461,927	0.1%	\$ 332	0.60%	\$ 332	\$ 44	\$ 375	0.23%	0.1%	0.000812878	\$ 1.16	\$ 0.0008130
Traffic Control Lighting	42	11	\$ 2,909	22,985	0.0%	\$ 17	0.57%	\$ 17	\$ 2	\$ 19	0.64%	0.0%	0.000812878	\$ 0.14	\$ 0.0008130
<b>Total Uniform Tariffs</b>		<b>19,849</b>	<b>\$ 70,658,638</b>	<b>679,609,806</b>	<b>100.0%</b>	<b>\$ 488,000</b>		<b>\$ 449,040</b>	<b>\$ 38,960</b>	<b>\$ 488,000</b>	<b>0.69%</b>	<b>100.0%</b>	<b>0.000718059</b>	<b>\$ 2.05</b>	<b>\$ 0.0007180</b>

Monthly Bill Increase - All Classes (Increase of \$375,000) @ 25% Enrollment - Scenario 2

Class	Sch.	Avg Customer	Billed Revenue	Energy kWh	Energy Proportion	Class Program Funding Requirements, Based on Energy Proportion (no cap)	% Change Billed (no cap)	Class Funding with non-res. \$2,000 Mo. Cap.	Remaining Program \$ Reallocated to Non-capped Classes	Total Class Program Funding Requirements with Reallocation	% Change Billed	Proportion of Program Funding (with cap)	kWh Rate per Class	Avg. Monthly Bill Increase	Flat Cust. & kWh Increase
Residential Service	1 & 5	13,816	\$ 23,196,593	193,062,091	28.4%	\$ 106,529	0.46%	\$ 106,529	\$ -	\$ 106,529	0.46%	28.4%	0.00055179	\$ 0.64	\$ 0.64
Small General Service	7	2,727	\$ 2,643,320	20,119,638	3.0%	\$ 11,102	0.42%	\$ 11,102	\$ -	\$ 11,102	0.42%	3.0%	0.00055179	\$ 0.34	\$ 0.0005520
Large General Service	9	962	\$ 13,290,040	130,166,972	19.2%	\$ 71,824	0.54%	\$ 71,824	\$ -	\$ 71,824	0.54%	19.2%	0.00055179	\$ 6.22	\$ 0.0005520
Large Power Service	19	6	\$ 22,991,653	268,724,111	39.5%	\$ 148,279	0.64%	\$ 148,279	\$ -	\$ 148,279	0.64%	39.5%	0.00055179	\$ 1,925.70	\$ 0.0005520
Agricultural Irrigation Service	24	2,298	\$ 8,249,579	66,669,479	9.8%	\$ 36,787	0.45%	\$ 36,787	\$ -	\$ 36,787	0.45%	9.8%	0.00055179	\$ 1.33	\$ 0.0005520
Unmetered General Service	40	2	\$ 474	5,388	0.0%	\$ 3	0.63%	\$ 3	\$ -	\$ 3	0.63%	0.0%	0.00055179	\$ 0.12	\$ 0.0005520
Street Lighting	41	27	\$ 162,552	461,927	0.1%	\$ 295	0.16%	\$ 295	\$ -	\$ 295	0.16%	0.1%	0.00055179	\$ 0.79	\$ 0.0005520
Traffic Control Lighting	42	11	\$ 2,909	22,985	0.0%	\$ 13	0.44%	\$ 13	\$ -	\$ 13	0.44%	0.0%	0.00055179	\$ 0.10	\$ 0.0005520
<b>Total Uniform Tariffs</b>		<b>19,849</b>	<b>\$ 70,658,638</b>	<b>679,609,806</b>	<b>100.0%</b>	<b>\$ 375,000</b>		<b>\$ 375,000</b>	<b>\$ -</b>	<b>\$ 375,000</b>	<b>0.53%</b>	<b>100.0%</b>	<b>0.00055179</b>	<b>\$ 1.57</b>	<b>\$ 0.0005520</b>

**Summary of Revenue Impact**  
**Current Billed Revenue to Proposed Billed Revenue**

Line No	<u>Tariff Description</u>	Rate Sch. No.	Average Number of Customers <sup>(1)</sup>	Normalized Energy (kWh) <sup>(1)</sup>	Current Billed Revenue
<u>Uniform Tariff Rates:</u>					
1	Residential Service	1	13,812	192,961,362	\$23,185,050
2	Residential Service - Time-of-Day Pilot	5	4	100,729	\$11,542
3	Small General Service	7	2,727	20,119,638	\$2,643,320
4	Large General Service	9	962	130,166,972	\$13,290,040
5	Dusk to Dawn Lighting	15	0	377,216	\$121,519
6	Large Power Service	19	6	268,724,111	\$22,991,653
7	Agricultural Irrigation Service	24	2,298	66,669,479	\$8,249,579
8	Unmetered General Service	40	2	5,388	\$474
9	Street Lighting	41	27	461,927	\$162,552
10	Traffic Control Lighting	42	11	22,985	\$2,909
11	Total Uniform Tariffs		19,849	679,609,806	\$70,658,638

Non-residential Mo. Bill Cap Amount:	2.00%
Program Saturation Percentage	100.00%
Annual Program Costs (estimated at full participation)	\$ 1,952,000.00
Allocate remaining to non-res. before res. Customers	Yes

Monthly Bill Increase - All Classes (Increase of \$1,952,000) @ 100% Enrollment

Class	Sch.	Avg Customer	Billed Revenue	Energy kWh	Billed Revenue Proportion	Class Program Funding Requirements, Based on Billed Rev. Proportion (no cap)	% Change Billed (no cap)	Class Funding with non-res. 2.0% Mo. Cap.	% Change, Billed Rev 2.0% Mo. Cap.	Remaining Program \$ Reallocated to Non-capped Classes	Total Class Program Funding Requirements with Reallocation	% Change Billed	Proportion of Program Funding (with cap)	Proportion of Non-Residential Customers' Program Funding (with cap)	kWh Rate per Class	Avg. Monthly Bill Increase
Residential Service	1 & 5	13,816	\$ 23,196,593	193,062,091	32.8%	\$ 640,824	2.763%	\$ 1,002,759	4.323%	\$ 0	\$ 1,002,759	4.323%	51.4%	N/A	0.005193972	\$ 6.05
Small General Service	7	2,727	\$ 2,643,320	20,119,638	3.7%	\$ 73,024	2.763%	\$ 52,866	2.000%	\$ -	\$ 52,866	2.000%	2.7%	5.6%	0.002637602	\$ 1.62
Large General Service	9	962	\$ 13,290,040	130,166,972	18.8%	\$ 367,148	2.763%	\$ 265,801	2.000%	\$ -	\$ 265,801	2.000%	13.6%	28.0%	0.002041999	\$ 23.01
Large Power Service	19	6	\$ 22,991,653	268,724,111	32.5%	\$ 635,162	2.763%	\$ 459,833	2.000%	\$ -	\$ 459,833	2.000%	23.6%	48.4%	0.001711172	\$ 5,971.86
Agricultural Irrigation Service	24	2,298	\$ 8,245,579	66,669,478	11.7%	\$ 227,901	2.763%	\$ 164,992	2.000%	\$ -	\$ 164,992	2.000%	8.5%	17.4%	0.002474769	\$ 5.98
Unmetered General Service	40	2	\$ 474	5,388	0.0%	\$ 13	2.763%	\$ 9	2.000%	\$ -	\$ 9	2.000%	0.0%	0.0%	0.001758035	\$ 0.39
Street Lighting	41	27	\$ 162,552	461,927	0.2%	\$ 4,491	2.763%	\$ 3,251	2.000%	\$ -	\$ 3,251	2.000%	0.2%	0.3%	0.007038002	\$ 10.03
Traffic Control Lighting	42	11	\$ 2,509	22,985	0.0%	\$ 80	2.763%	\$ 58	2.000%	\$ -	\$ 58	2.000%	0.0%	0.0%	0.002510937	\$ 0.44
<b>Total Uniform Tariffs</b>		<b>19,849</b>	<b>\$ 70,658,638</b>	<b>679,609,806</b>	<b>100.0%</b>	<b>\$ 1,952,000</b>		<b>\$ 1,952,000</b>		<b>\$ 0</b>	<b>\$ 1,952,000</b>	<b>2.763%</b>	<b>100.0%</b>		<b>0.002872236</b>	<b>\$ 8.20</b>