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Low-Income Rate Assistance Program (LIRAP)

Annual Summary Report

For the program period October 2022 - September 2023

OREGON

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Overview

Avista Utilities' Low-Income Rate Assistance Program (LIRAP or Program), approved by the Public Utility Commission of Oregon (PUC or Commission) in 2002, collects funding through the Company's Schedule 493, "Residential Low-Income Rate Assistance Program (LIRAP) - Oregon", to be disbursed to qualified low-income households within Avista's Oregon service territory. The purpose of LIRAP is to reduce the financial burden that utility bills may place on those customers least able to pay such living expenses. LIRAP, like the Federally sponsored and State-administered Low-Income Home Energy Assistance Program (LIHEAP), is available for customers with incomes at or below 60% State Median Income (SMI), and can provide monetary assistance to households that are unable to afford their energy bills by paying for ongoing energy costs, helping the household avoid having its utilities shut off due to nonpayment, or assisting in the reestablishment of service if a disruption does ultimately occur.

While LIRAP has historically been administered in partnership with – and distributed solely by – the four distinct Community Action Agencies (CAAs or Agencies) that serve Avista's Oregon customers, the 2022-2023 LIRAP Program Year (PY)¹ represents a foundational shift in not only the way in which LIRAP is administered, but also changes to the overall assistance options available through LIRAP. These Program design changes were defined in the 2021-2022 LIRAP Annual Report,² and with one year's experience now complete, this 2022-2023 LIRAP Annual Summary Report (Report) is Avista's first opportunity to relay its resulting outcomes, observations, and learnings related to the new Program features. This Report is intended to provide a summary of the Company's LIRAP activities for the given Program Year, including, but not limited to, overall Program results; administration and Program delivery; customer impacts; and outreach and engagement.

For the 2022-23 PY, the following LIRAP options were available for each household within the income ranges provided:

¹ "Program Year" is from October 1, 2022 through September 30, 2023.

² [Docket No. RG 51](#), LIRAP 2021-2022 Annual Summary Report, pgs. 9-14.

Income Range	Bill Discount	Arrearage Assistance
Zero to 5% SMI	90%	Arrearage Forgiveness
6 to 20% SMI	60%	
21 to 40% SMI	25%	Arrearage Management Program
41 to 60% SMI	15%	

- Bill Discount:** Known as “My Energy Discount” (MED),³ the LIRAP bill discount is available to self-attested (as further described below) low-income customers up to 60% SMI. It is comprised of four distinct discount tiers, the amount of which is based on an individual household’s total income. Each income group—0 to 5% SMI, 6 to 20% SMI, 21 to 40% SMI, and 41 to 60% SMI—is provided with a specified discount percentage, which is deducted from the participating customer’s net bill each month.
- Arrearage Management Program (AMP):** Available to customers with incomes at 21-60% SMI, the AMP reduces a customer’s past due balance, or “arrearage”, over a 12-month period by providing an incentive for on-time, regular payment of their current bill, plus a portion of the past due balance. Customers within this income range that are eligible for My Energy Discount, yet have a past due balance on their account, will be offered the opportunity to pay off their arrearage using the AMP, not to exceed a maximum AMP award of \$1,000.
- Arrearage Forgiveness Program (AFP):** Available to customers with incomes at 0-20% SMI, the AFP provides complete arrearage forgiveness, up to a maximum award amount of \$1,000. Customers within this income range that are eligible for My Energy Discount, yet have a past due balance on their account, will be offered the opportunity to have their arrearage entirely forgiven.

The LIRAP elements summarized above help to both alleviate the burdensome impact that a past due balance can have on a household, as well as to lower the overall energy burden⁴ on an ongoing basis so that customers are able to better maintain affordability each month. Additionally, while not a part of LIRAP, the donation-based

³ Initially referred to as “My Energy Rate,” Avista changed its LIRAP bill discount moniker to “My Energy Discount” based on customer feedback received as a part of its April 2023 Participant Survey, which is further detailed beginning on page 31 of this Report. For purposes of this Report, the program will be referred to by its current and ongoing name, “My Energy Discount”.

⁴ “Energy burden” is defined as the percentage of household income being allocated to energy costs. Avista’s MED, as provided in the 2021-22 LIRAP Report (pg. 14) and associated Energy Burden Assessment (2021-22 LIRAP Report, Attachment A), is designed to provide the appropriate monthly bill discount needed for customers within each given income tier to achieve an energy burden of three percent or less for natural gas.

Project Share⁵ is also available to help customers experiencing hardship or an energy emergency (i.e., in jeopardy of disconnect due to nonpayment), providing yet another financial safety net to help resource-constrained customers manage their basic living costs.

With the programmatic and administrative transformation of LIRAP effective October 1, 2022, the 2022-2023 Program Year saw unparalleled growth in the number of customers served, with approximately 6,533 households provided with LIRAP benefits – MED, AMP, or Arrearage Forgiveness – at a total expense of approximately \$1,589,123 in support of these efforts. This includes about \$1,345,312 in direct service (DS) funding that was provided directly to customer accounts and approximately \$243,811 for administration and Program delivery, or “Admin” (inclusive of costs incurred by both the local CAAs as well as Avista). This performance far surpasses the Company’s preliminary estimates for participation provided in 2022⁶ as well as any historical performance of LIRAP, as further detailed throughout this Report. Comparatively, as provided in the 2021-2022 LIRAP Report,⁷ in the 20 years since LIRAP’s inception in 2002, approximately 12,367 energy grants have been provided to Avista customers, totaling approximately \$3,811,530 in assistance. This means that in just one year’s time, Avista’s LIRAP has already spent around 41% of its lifetime expenditures and, rather than a yearly average of around 593⁸ grants being provided to customers, has helped over 6,500 individual households balance their energy costs. Further details regarding these accomplishments and others, as well as lessons learned, for the 2022-2023 PY are contained within this Report.

Program Year Results

As noted in its prior Report⁹ and within Avista’s request to modify its LIRAP from a yearly lump-sum grant benefit to a monthly bill discount with arrearage assistance for

⁵ Project Share is a donation-based, community funded program sponsored by Avista that provides one-time emergency support to customers within the Company’s service territory. Avista customers, employees and shareholders help support the fund with voluntary contributions that are distributed through local Agencies to customers in need.

⁶ [Docket No. ADV 1410](#), June 1, 2022 filing at page 10.

⁷ [Docket No. RG 51](#), LIRAP 2021-2022 Annual Summary Report, pg. 3.

⁸ Average number of grants per year is based on the most recent 8 years of LIRAP performance, PYs 2014-2015 through 2021-2022.

⁹ [Docket No. RG 51](#), LIRAP 2021-2022 Annual Summary Report, pgs. 12-14.

income-qualified customers,¹⁰ the enactment of the Energy Affordability Act (also known as House Bill 2475, or HB 2475) in 2022 opened the door to expanded opportunities through which the Company could best serve its most vulnerable populations with a multitude of energy assistance options. This legislation gave utilities the discretion to consider factors such as differential energy burden and other such influences that affect affordability when establishing their rates, and, in essence, promoted the enhancement of existing bill assistance programs like LIRAP. As such, the 2022-2023 PY began a new era for Avista's LIRAP, offering relaxed eligibility requirements via self-attestation and delayed random verification; improved access to the Program via joint administration, additional application channels, and automatic enrollments; and a more effective targeting of affordability, as the new My Energy Discount was designed to meet specific energy burden thresholds rather than the lump-sum grant approach of its predecessor.¹¹ Each of these improvements, as well as the resulting PY performance for each LIRAP component, is discussed in further detail below.

Increasing Access to LIRAP Programs

Lowering Barriers

Prior to October 1, 2022, Avista customers seeking energy assistance through LIRAP were required to complete an application for such assistance with their local CAA, much like the qualification process required for LIHEAP – a process that involved, in most cases, scheduling an appointment with the Agency, providing proof of income (pay stubs, taxes, etc.), and then, often, waiting an extended period of time for the approved assistance grant to be manually applied to the customer's account. Beginning with the 2022-2023 Program Year, this burdensome customer process – regularly found to be a barrier to access for many customers seeking assistance – was all but eliminated by allowing customers to simply self-attest, or declare, their income. This declaration consists only of the customer stating their income and the size of their household, and can be completed via telephone, online application, or paper submission. This pivot from requiring proof of income in favor of an honor-based declaration means that the only criteria for receipt of LIRAP assistance is that the household is an Avista natural gas customer (the primary or co-account holder), they have self-declared an income at or

¹⁰ [Docket No. ADV 1410/](#) Advice No. 22-03-G.

¹¹ [Docket No. ADV 1410/](#) Advice No. 22-03-G.

below 60% SMI for their respective household size, and they have agreed to the terms and conditions of the Program.

To create ease in the overall application and qualification process, while also maintaining the integrity of the Program and ensuring that only those needing LIRAP are the ones actually receiving it, Avista's approval of these modifications contained a provision for randomized post-enrollment verification of income.¹² Under this provision, participants of LIRAP's My Energy Discount will be verified via a 3% random sample process, beginning no sooner than 9-months after the start of the Company's 2022-2023 PY (i.e., July 1, 2023). Conversations with its partner Agencies regarding the overall implementation of the new LIRAP elements and related administrative processes have been ongoing throughout the 2022-2023 PY, but the Company has also considered in earnest the various comments submitted within the Company's Docket No. ADV 1410 – more specifically, the recommendation that Avista “engage with stakeholders before implementing any income verification” and that this engagement “should touch on the modalities used and documentation required for verification.”¹³ Avista agrees that further engagement is necessary, with both the Agencies as well as any other external parties interested in Avista's bill assistance activities, before any form of verification process can begin and therefore has not, to-date, completed any verifications for its LIRAP participants. The Company expects this engagement with interested parties to be resolved in 2024, with the resulting 3% verification modalities to occur prior to the beginning of the third year of My Energy Discount (i.e., before the end of PY 2023-2024).

Opening Doors Through Joint Administration

Another LIRAP administration modification that became effective with the 2022-2023 Program Year, and that works in tandem with self-declaration to significantly decrease access barriers for customers, is the ability for customers to enroll in the Program through both their local CAA and/or through Avista directly.¹⁴ As alluded to previously, the funding collected for LIRAP each year has historically been divided amongst the four CAAs in Avista's Oregon service territory for disbursement to qualifying

¹² [Docket No. ADV 1410](#).

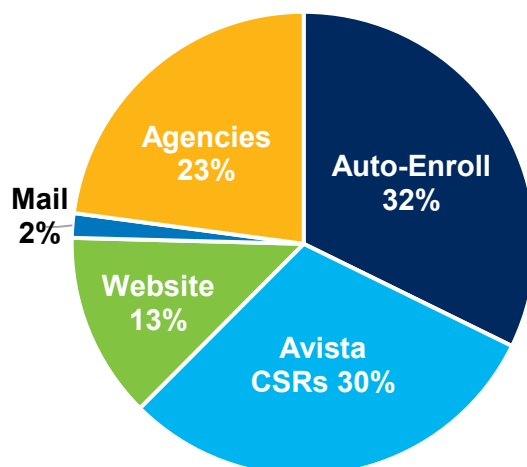
¹³ [Docket No. ADV 1410](#), “Comments on Avista's bill discount proposal”, submitted by the Community Partnership of Oregon (CAPO) on July 18, 2022.

¹⁴ Avista became a joint administrator of its LIRAP AMP in April 2022 ([See UM 2211](#), Avista AMP Modifications Update and Comment Period Notification, March 31, 2022,) and the remaining LIRAP components on October 1, 2022 ([Docket No. ADV 1410](#)).

customers and, consequently, customers in need of energy assistance could only access LIRAP through these Agencies. The opportunity for Avista to become a “joint administrator” of its Program replaces the decades-old practice of only allowing customers one point of access when seeking LIRAP assistance for their utility bill. Additionally, joint administration of the Program brought with it a need to expand the ways in which customers could access Avista or its Agencies to apply for LIRAP; rather than an in-person or telephone appointment with a CAA, customers can now apply for assistance by telephone, a paper form, or through Avista’s energy assistance website. In addition, the overall language with which Avista’s LIRAP information was presented was improved during the 2022-2023 PY, both in the verbiage used and the languages available – as discussed in further detail within the *Outreach & Engagement* section of this Report. As noted prior, all of these channels only require self-attestation of income to apply, further reducing the time and effort needed to receive assistance.

Recognizing the important role that Agencies play within the communities they serve, as well as the additional services they can provide beyond Avista programs, joint administration was designed to closely align the procedures and relationships between both Avista and the CAAs. For example, because CAAs continue to be the sole administrator for many other customer assistance programs such as LIHEAP, affordable housing, and food assistance, ensuring that the connection to these other programs is still being made in instances when customers enroll in LIRAP through Avista directly is essential. To accomplish this, the contact and energy usage information of customers who enroll in the My Energy Discount is automatically sent to the appropriate CAA (via a monthly report) so that the Agency may proactively reach out to the customer to provide additional services. To illustrate the impact of joint administration and the added access channels available to households for LIRAP’s 2022-2023 Program Year, Chart No. 1 below shows total customer enrollments for the PY by enrollment type.

Chart No. 1 – LIRAP Participants by Enrollment Method



A final modification incorporated into the 2022-2023 Program Year that helped to drastically increase the number of LIRAP customers served and to mitigate previously experienced accessibility issues was the use of automatic enrollments for My Energy Discount, which will be discussed in further detail in the *My Energy Discount* section beginning on page 9.

My Energy Discount

Auto-Enrollments & Individual Customer Discounts

With Avista’s new My Energy Discount, AMP, and AFP all effective for the new Program Year on October 1, 2022, LIRAP was poised to reach customers, both qualitatively and quantitatively, in unprecedented ways. The year’s first such accomplishment was seen in November 2022, when approximately 2,598 “known low-income” customers were automatically enrolled in My Energy Discount. “Known low-income” means customers who had received income-qualified energy assistance¹⁵ within two years of the automatic enrollment. Households determined to be eligible for this auto-enrollment were enrolled at the lowest discount tier of 15% and sent a letter advising them that the benefit is a general discount amount, and that they should contact Avista or their local Agency to update their information if they believe that the given discount is not accurately reflective of their current income situation. In the wake of this communication,

¹⁵ Income-qualified energy assistance includes LIHEAP and LIRAP funding, and excludes Emergency Assistance/Project Share and COVID-specific programs such as the Debt Relief provided pursuant to [Docket No. ADV 1237](#).

577 customers contacted Avista or an Agency to update their enrollment and receive a discount more suitable for their household's situation.

Additionally, beginning in May 2023, auto-enrolled customers' discounts were updated using monthly income and household data provided by Oregon Housing and Community Services (OHCS). This data-sharing partnership between OHCS and the Company allowed Avista to identify discrepancies between self-attested and actual income for a subset of the enrolled population (approximately 2,000 customers). As provided in Table No. 1 below, these findings revealed that 58% of customer income information matched what they had attested to, 36% of customers were receiving a discount *lower* than what they were eligible for, and 6% of customers were receiving a discount *higher* than what they were eligible for. In scenarios where the automatically enrolled 15% discount was shown to be below what the household income warranted (i.e., the income data provided to OHCS proved that the household's income was below 40% SMI and therefore should be receiving a higher discount), customers' discounts were increased to the discount tier more appropriate to their income. Customers not yet enrolled in My Energy Discount were also enrolled at the appropriate discount based on the OHCS data provided. No changes were made to those households receiving a discount that was higher than what their income warranted. As of September 30, 2023, 51% of auto-enrolled customers had updated their initial enrollment information using either customer provided information (577 accounts updated) or OHCS data (756 accounts updated).

Table No. 1 – OHCS Data, Comparison to Customer-Declared Income

Customer Situation	Percentage of Enrolled Customers
Customer is receiving smaller discount than is eligible for	36%
Customer receiving larger discount than is eligible for	6%
Declared income matches actual income	58%

Increased Participation in Energy Assistance

Overall, the LIRAP bill discount has performed exceedingly well in its first year, far surpassing the Company's preliminary estimates for participation provided in 2022.¹⁶ At

¹⁶ [Docket No. ADV 1410](#), June 1, 2022 filing at page 10.

that time, Avista had calculated a potential first year uptake of approximately 3,310 eligible customers, with a potential associated direct service expenditure of about \$878,648 for My Energy Discount. When including both the AMP and AFP in these estimates, the total was forecasted at about \$1.6 million in LIRAP funds to be spent; this forecast assumed that *all* participating My Energy Discount customers would also receive Arrearage Forgiveness or participate in the AMP. Avista's actual results for the 2022-2023 PY reflect over double its initial participation estimate but with lesser spend, with the LIRAP bill discount reaching 5,969 households in its first year and providing about \$809,250 in discounts, and with total DS spend (including AMP and AFP) coming in at just over \$1.3 million for the 6,533 total households helped with LIRAP, as further described within this Report. This is an increase of over 12 times the volume in customer participation over the 509 grants and approximately \$209,834 spend (now nearly 386% higher) reported for the prior 2021-2022 Program Year.

When evaluated against the Company's 2022 Low-Income Needs Assessment (LINA) conducted by Empower Dataworks,¹⁷ which identified that of the approximately 94,000 residential service households within Avista's Oregon service area, approximately 17,000 could qualify for a bill assistance program with an income threshold of 60% SMI, Avista's My Energy Discount alone reached nearly 38% of those eligible within the first year of its implementation.

Chart No. 2 shows discount tier enrollments on a monthly basis for the entire 2022-2023 Program Year. This chart illustrates the early impact of the auto-enrolled customers (who started out at the 15% discount tier as noted on page 8 of this Report) and how enrollments in the other discount tiers gradually climbed throughout the Program Year as (1) new customers enrolled at appropriate discount tiers and (2) auto-enrolled customers updated their income information to receive a discount amount more appropriate to their specific income. The subsequent Chart No. 3 provides a closer look at total households enrolled in My Energy Discount, by discount percentage, as of September 30, 2023.

¹⁷ [Docket No. RG 51](#), 2021-22 LIRAP Report, Attachment A.

Chart No. 2 – My Energy Discount Enrollments by Month

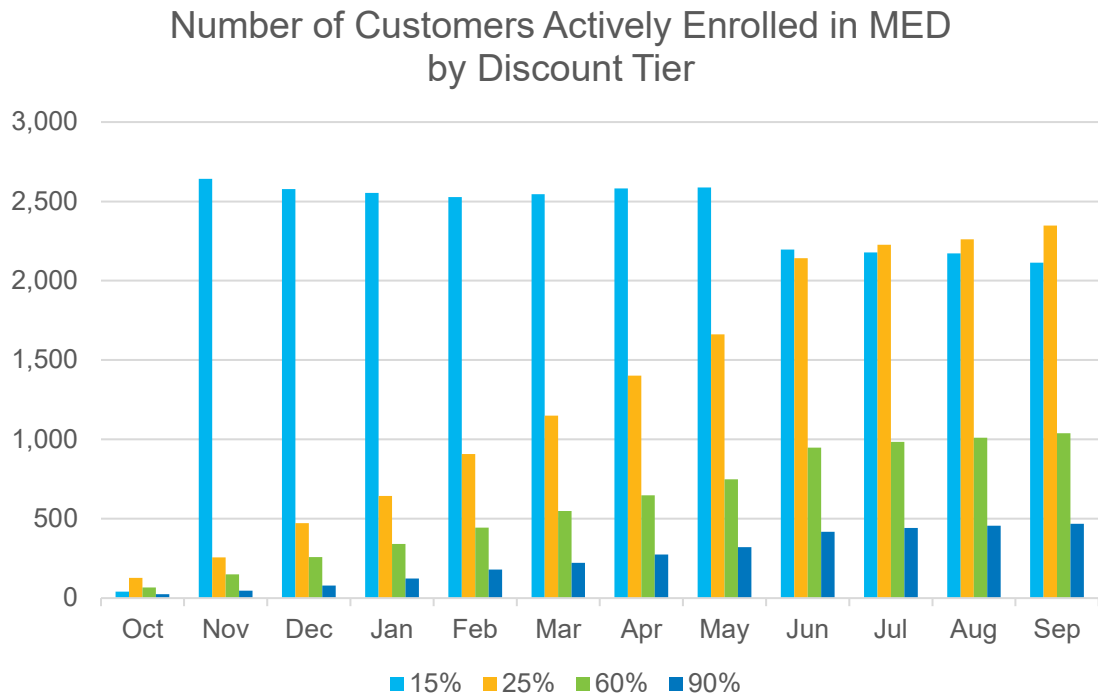
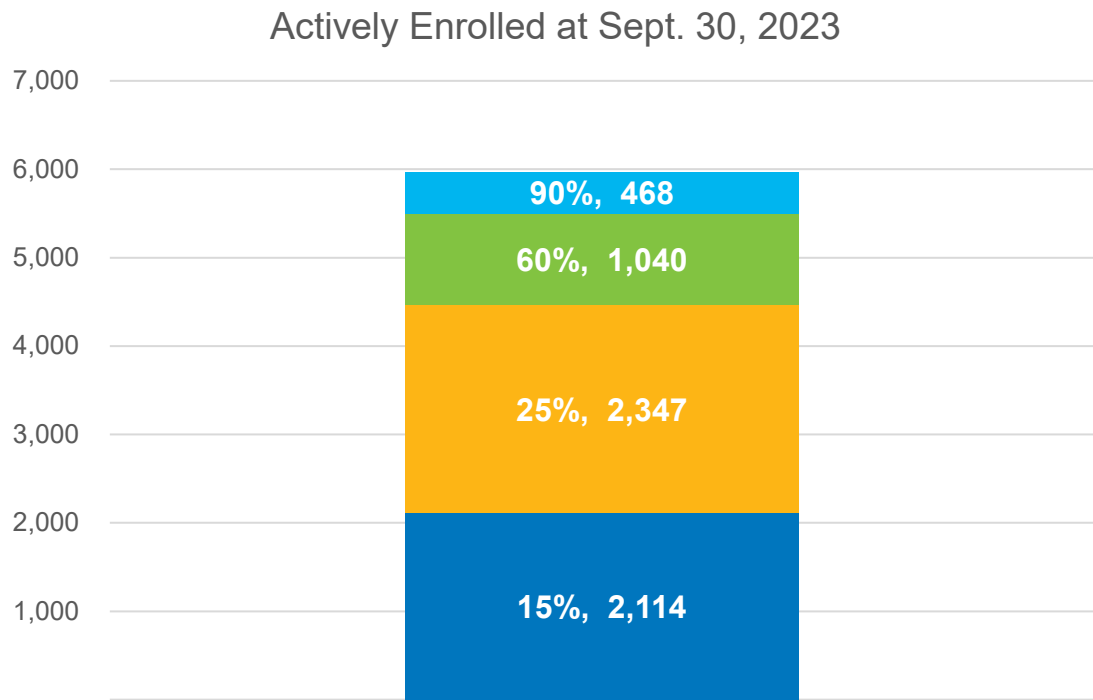


Chart No. 3 – My Energy Discount Participants by Discount Tier



Arrearage Management Plan

As detailed in the 2021-2022 LIRAP Report, Avista received support from the Commission to collaborate with CAAs to incorporate an Arrearage Management Program into its LIRAP effective October 1, 2021. The AMP benefit is designed to assist qualified customers with incomes between 21-60% SMI by reducing the amounts of an unpaid, past-due balance owed over time and by rewarding regular payment behavior. To accomplish this, upon enrollment in the AMP, 10% of the arrears the customer is responsible for will be spread out over a 12-month period. For each on-time payment the customer makes on their portion of the arrears (in addition to their current bill), 1/12th of their remaining 90% of arrears will be forgiven (i.e., paid for by Avista's LIRAP). The following is an example of how the AMP customer benefit is applied:

Sample AMP Customer Benefit:

A customer has \$300 arrears when enrolled. Under the AMP, the arrears would be divided into two parts: (1) 10% of the balance (customer responsibility), and (2) 90% of the balance (LIRAP incentive). The following is an example of the amount to be billed to the AMP customer on a monthly basis:

10% of \$300= \$30/12 months = **\$2.50/month** (to be paid by the customer)

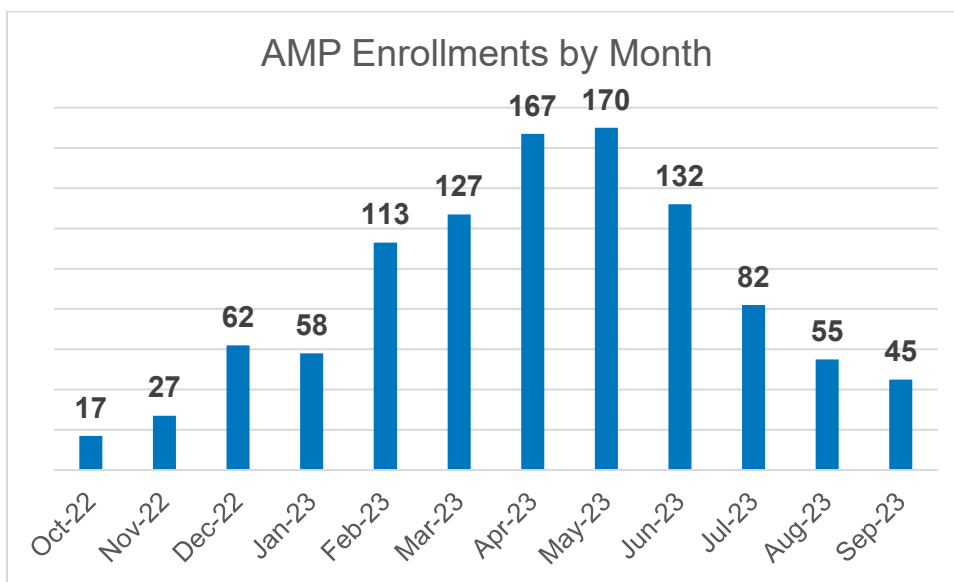
90% of \$300= \$270/12 months = **\$22.50/month** (to be paid by the LIRAP)

If the customer makes the \$2.50 payment to cover the 10%, *in addition to their current monthly bill*, they will receive a credit of \$22.50 on their bill. At the end of the 12 months, if the customer has made regular on-time payments as requested, they will have paid the full \$30 to cover their 10%, and as an incentive for this Avista will have covered the remaining \$270 (90%).

Results from the initial 6-month implementation of the AMP led to several program enhancements in April 2022, which included (1) allowing Avista to jointly administer this component of LIRAP, and (2) expanding eligibility to include self-attestation of income or previous qualification for bill assistance (within the most recent two-year period), rather than requiring an application for low-income assistance to be completed with the Agencies. Additionally, programmatic guidelines for AMP that were found to be barriers for the Agencies, the Company and customers were removed – such as the restrictions on re-enrollment (previously limited to 2 times every 7 years) and the requirement that all

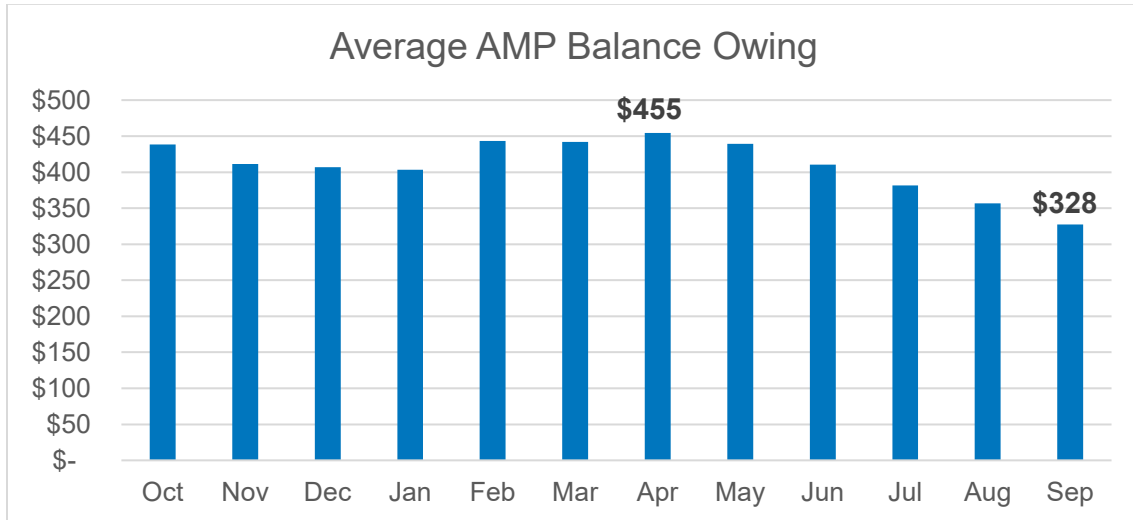
forms of energy assistance be exhausted before the AMP is applicable. These modifications, as well as the integration of My Energy Discount on October 1, 2022 and the multitude of process improvements made to help bring awareness of the AMP to Avista customers, helped to increase utilization of the AMP over time, bringing much-needed assistance to customers struggling with past due balances. Chart No. 4 below illustrates this increased uptake over time, as well as the seasonal nature of customers pursuing energy assistance, with enrollments again declining during the summer months when natural gas heating is no longer an essential bill.

Chart No. 4 – AMP Enrollments by Month, 2022-2023 PY



Throughout the 2022-2023 Program Year, Avista’s AMP provided just over \$134,000 in credits to participating customers’ accounts. In total, 1,055 customers enrolled in the AMP during the PY – 1,040 enrolled through Avista and 15 through the Agencies. At the end of the 2022-2023 PY, about 733 of these customers remained actively enrolled in the AMP, with a total of approximately \$240,094 remaining to be paid on all accounts (\$24,009 by participating customers, and \$216,085 by LIRAP). The lowest average pay off balance experienced this Program Year was \$328 per participant in September 2023, while the highest average pay off balance was in April 2023, at \$455, as shown in Chart No. 5.

Chart No. 5 – Average AMP Pay Off Balance, 2022-2023 PY



Differences between the 1,055 total enrollments and the 733 total active AMP participants at the end of the Program Year can be primarily attributed to the owed AMP balance having been paid off (either by the customer or energy assistance), customers stopping their services, or having been removed from the program due to missed payments. Of these enrollments, 290 households, or 27% of all enrolled, were removed from the program for non-payment (having missed two consecutive payments of their current bill plus AMP portion owed). Chart No. 6 below illustrates the number of enrollments per month in comparison to the number of customers removed from the AMP due to non-payment, and Table No. 2 further breaks this down to show the percentage of total enrolled customers that were removed from the program each month.

Chart No. 6 – AMP Enrollments Canceled for Non-Payment

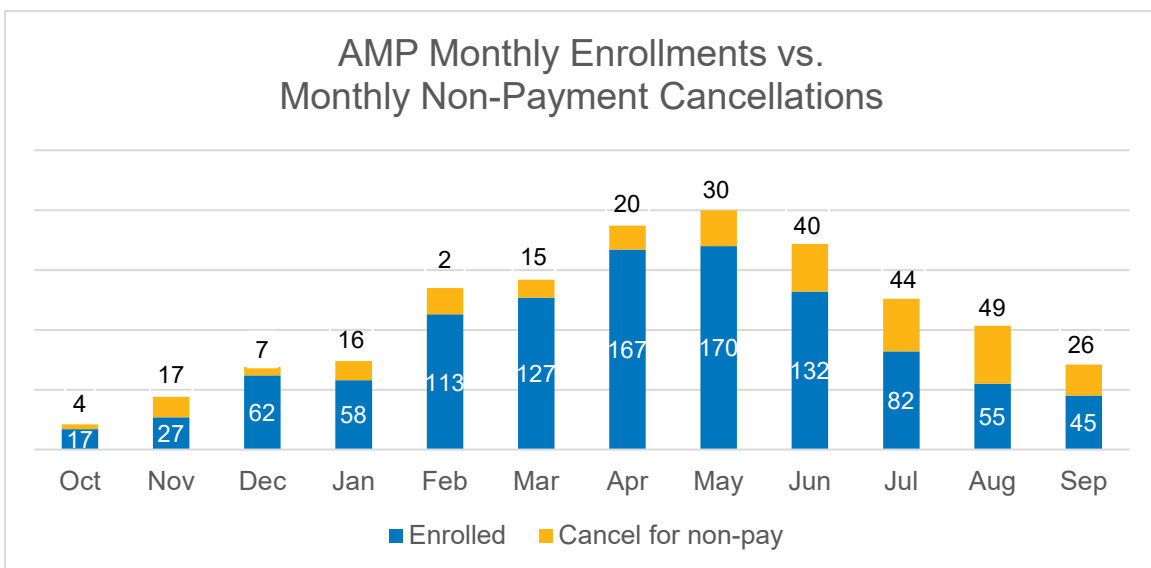
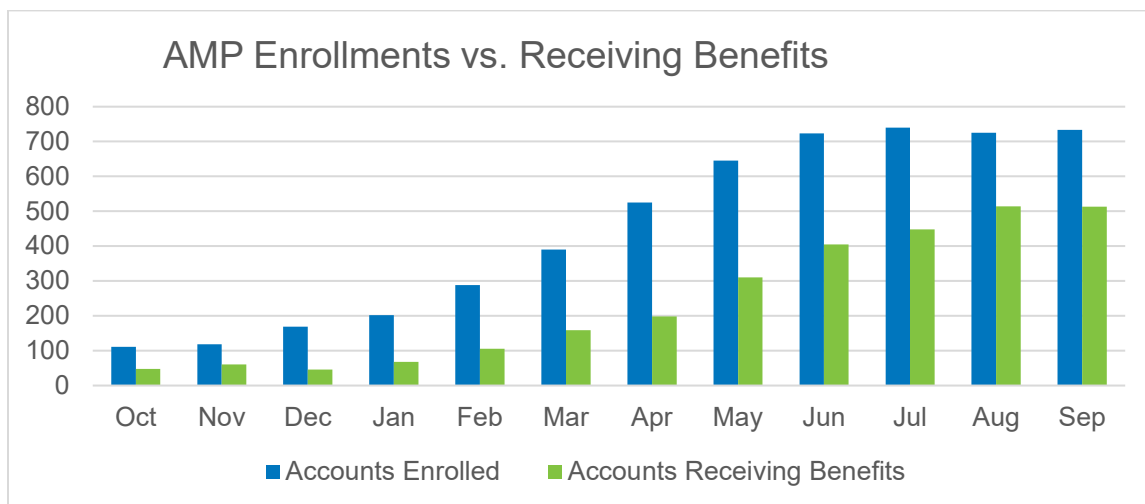


Table No. 2 – Percentage of AMP Enrollments Canceled for Non-Payment

Month	Customers Enrolled	Customers Removed for Non-Payment	Percentage of Customers Removed
October 2022	17	4	23.5%
November 2022	27	17	63.0%
December 2022	62	7	11.3%
January 2023	58	16	27.6%
February 2023	113	22	19.5%
March 2023	127	15	11.8%
April 2023	167	20	12.0%
May 2023	170	30	17.6%
June 2023	132	40	30.3%
July 2023	82	44	53.7%
August 2023	55	49	89.1%
September 2023	45	26	57.8%

Further, of the 1,055 customers who enrolled, 888 received at least one monthly credit on their bill during the Program Year; on average, customers receiving AMP benefits during the 2022-2023 PY received about 3 monthly credits. This means that approximately 167 customers enrolled in the AMP but did not receive benefits during the PY due to one of the reasons noted above or the timing at which they enrolled. For those that *have* received AMP credits, the average monthly benefit amount was \$44. Chart No. 7 shows the difference between customers enrolled in the AMP and customers actively receiving credits on their accounts.

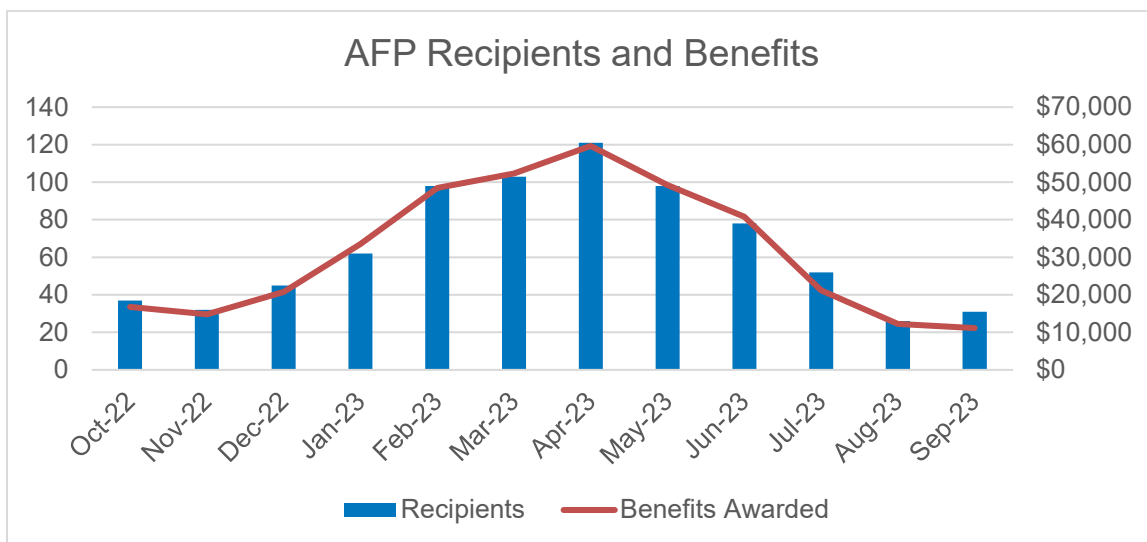
Chart No. 7 – AMP Participants Receiving Benefits



Arrearage Forgiveness Program

LIRAP’s Arrearage Forgiveness, which provides complete forgiveness of past due balances for Avista’s most income constrained customers (0-20% SMI), provided benefits to 774 customers during the 2022-2023 Program Year. In total, the AFP accounted for approximately \$380,293 in LIRAP spending, with the average past due balance forgiven being approximately \$491. Participation in the AFP demonstrated the overall seasonality Avista is accustomed to encountering for energy assistance, with enrollments peaking between February and May when natural gas balances are highest due to the heating season. Chart No. 8 below illustrates this phenomenon with a look at the number of recipients receiving this benefit, by month, during the 2022-2023 PY, as well as the dollar amount of benefits awarded:

Chart No. 8 – Arrearage Forgiveness, October 1, 2022-September 30, 2023



Anecdotally, the Arrearage Forgiveness Program has had an incredible impact on individual customers, compelling them to share their unique stories of challenge with Avista Customer Service Representatives (CSRs) and express immense gratitude. Below is one such account, which was shared by a member of the Billing Assistance Support & Enrollment (BASE) Team:

“I spoke to a single mother of two with no income, and her account was in collections process. Her service was about to get disconnected. I was able to enroll her in MED with a 90% discount, forgive her *entire* account balance and cancel collections! She was extremely grateful and so relieved...

- *BASE Team Member*

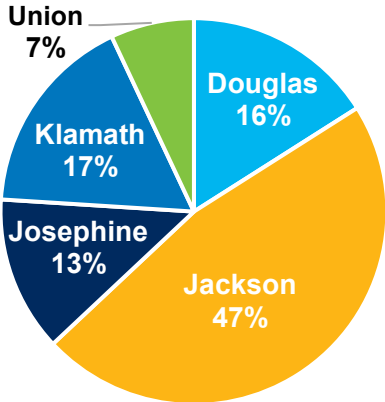
Avista continues to capture customer sentiments as part of our overall data-collection strategy, in an effort to, over time, provide insights regarding the individual customer experience and understanding regarding the long-term impact of its LIRAP.

When taken together, the above LIRAP components provide Avista customers with assistance options intended to both alleviate the burden of a past due balance, as well as address the overall lack of affordability experienced by those households chronically unable to keep up with essential living expenses. Programs such as Arrearage Forgiveness or the AMP help to offer a “clean slate” for customers that have fallen behind on their energy bills, while the MED can then decrease the energy burden of the household to a level more suited to their specific income situation. In its first year, the Company’s new LIRAP modifications assisted approximately 38% of the potentially eligible population, helping over 6,500 households with more than \$1.3 million in direct payments to their accounts.

Demographic Information

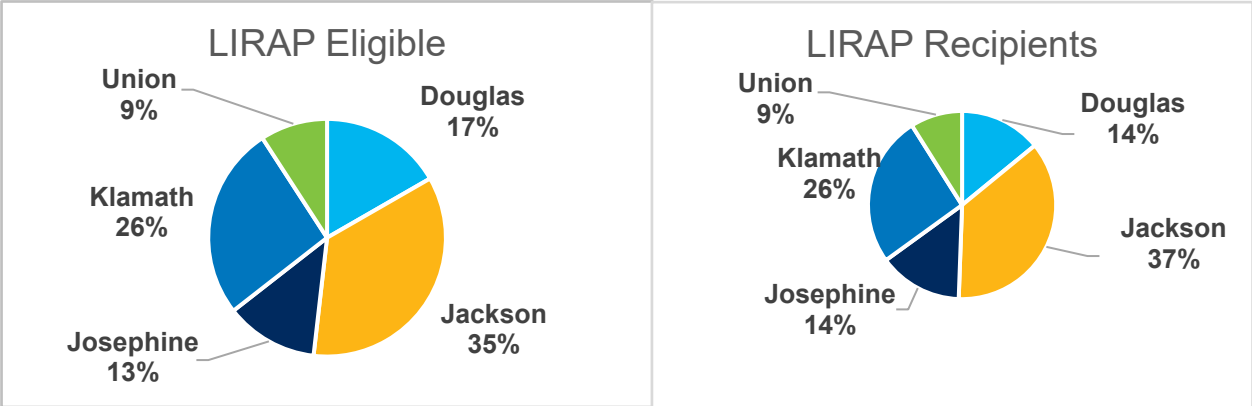
To understand the unique needs of LIRAP customers more holistically, Avista collects voluntary demographic information during enrollment. While not a part of this voluntary collection, information regarding the geographic location of LIRAP participants is also an important piece of data to help inform the overall energy assistance needs of Avista’s service territory, and is analyzed in tandem with the specific demographics provided directly from customers. In total, Avista’s service territory in Oregon consists of 5 counties – Douglas, Jackson, Josephine, Klamath and Union – each of which serves a unique portion of the total Avista customers in Oregon. The customer distribution within each of these counties is illustrated in Chart No. 9 below.

Chart No. 9 – Total Oregon Avista Customers by County



While this illustration provides a baseline for customer distribution across its entire Oregon service territory, for purposes of LIRAP the Company also looked at the distribution of potentially eligible customers (i.e., the 17,000 identified within Avista’s LINA) in comparison to those receiving LIRAP benefits across these same five counties – as seen in Chart No. 10 below. When taken together, this provides a more succinct demonstration of which counties may be encountering more need than others as well as whether those that potentially qualify for assistance are actually being enrolled in the programs they need. For example, while Klamath only accounts for 17% of Avista’s service area (Chart No. 9), it makes up approximately 26% of the potentially low-income customers (Chart No. 10); conversely, Jackson County makes up 47% of our customer distribution but only 35% of our potentially eligible group. This comparison also reveals an opportunity to reach more eligible customers in Douglas County, as it is the only county where there is a notable gap between LIRAP eligibility and recipients.

Chart No. 10 – LIRAP Eligible Customers Compared to LIRAP Recipients



With regard to demographic information voluntarily collected from LIRAP participants, Table No. 3 shows the response rate of enrollees, excluding auto-enrolled customers and OHCS-enrolled customers who did not have an opportunity to provide demographic information. In total, 5,041 customers had the opportunity to share this information during enrollment.

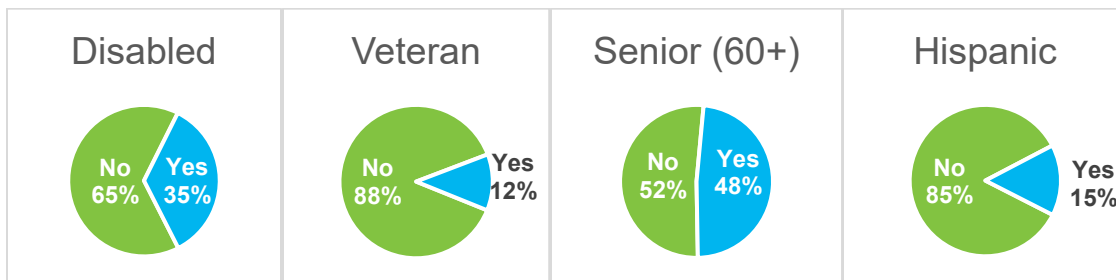
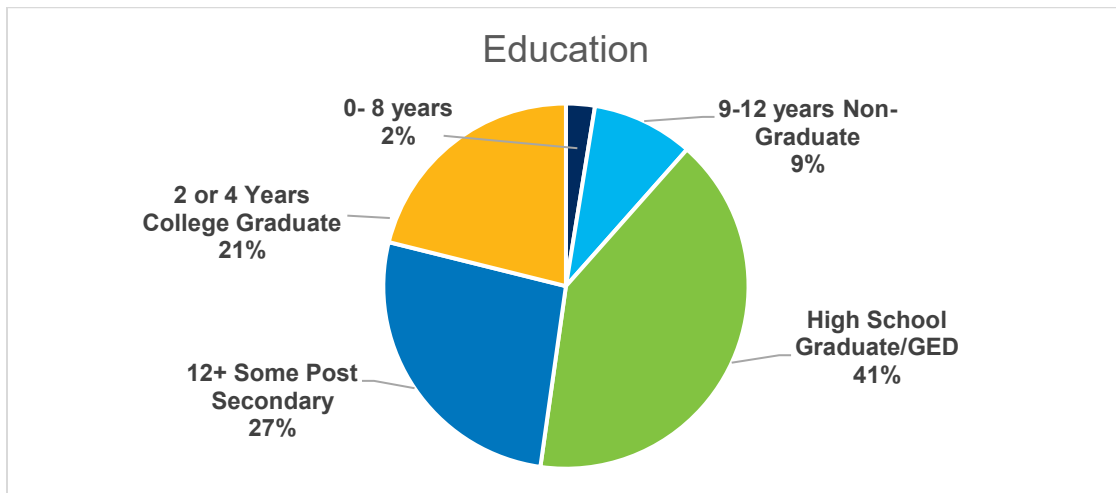
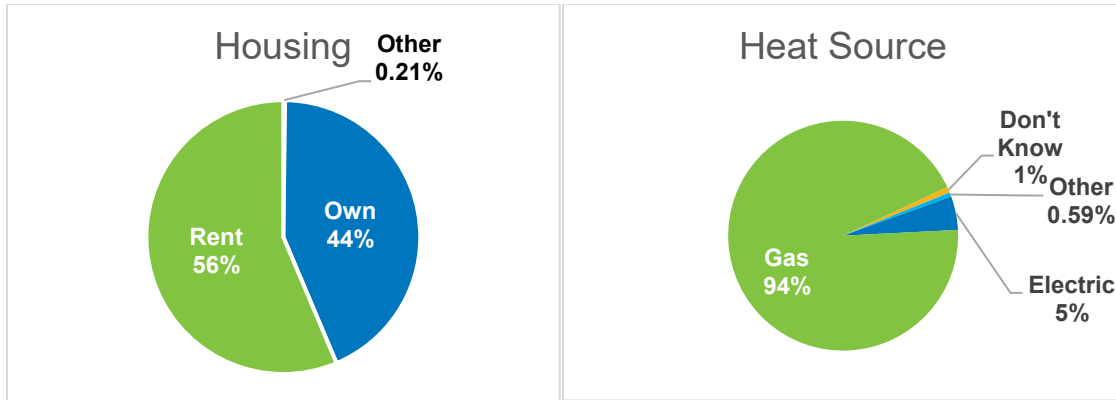
Table No. 3 – Demographic Response Rates, October 1, 2022-September 30, 2023

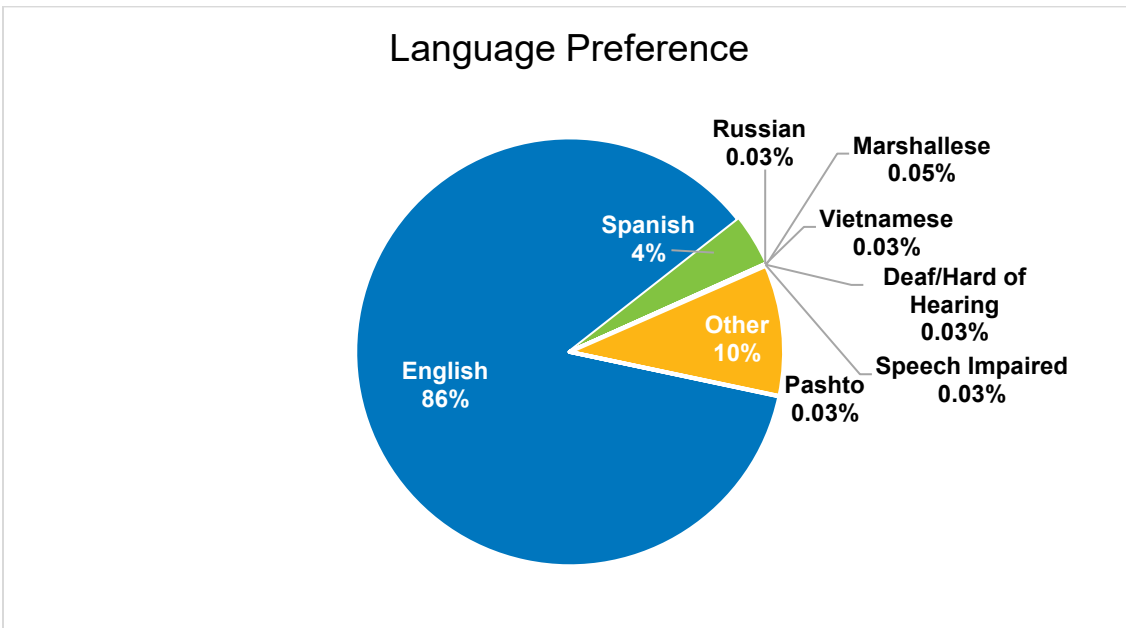
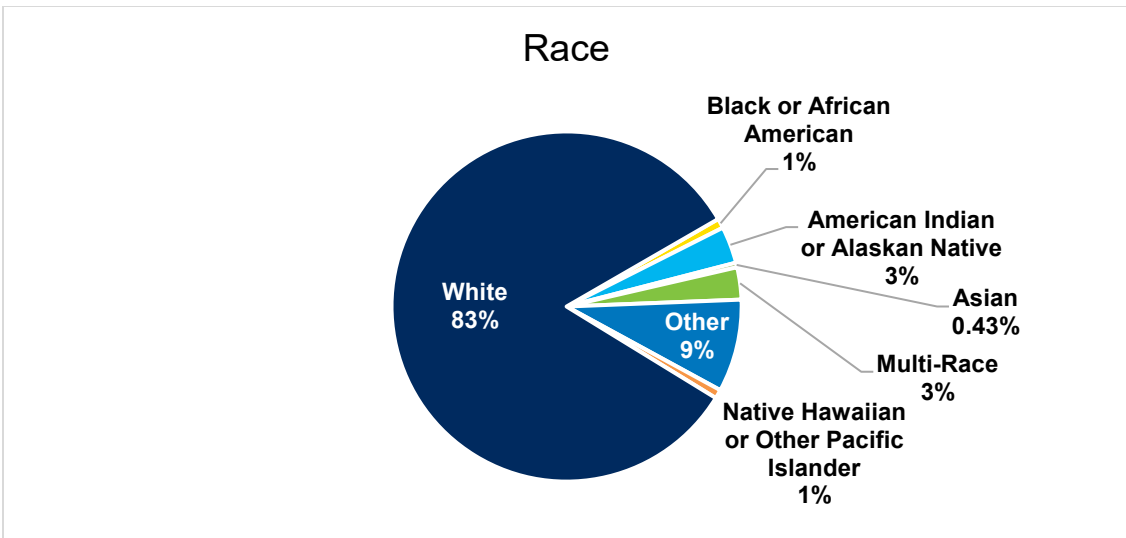
Demographic Category	Response Rate
Housing (own/rent)	86%
Heat Source	87%
Education Level	59%
Disability Status	63%
Veteran Status	61%
Senior (60 or older)	68%
Race	55%
Ethnicity (Hispanic)	53%
Language Preference	73%

Notable in the response rates is higher percentages for categories seemingly related to utility services – renter vs. homeowner and fuel sources – with an 86.5% average response rate. For demographic questions that may seem less related to utility services – or for some households, more private – such as education, disability status, Veteran status, senior status, race, ethnicity and language preference, the response rate was notably lower at an average of just 61.7%. This presents a challenge for Avista in understanding how effectively we are reaching vulnerable and underrepresented populations and will continue to be an area of focus as we work to engage and support these populations through marketing and outreach.

Of those customers that responded to the optional demographic questions, 48% identified as seniors, 35% as living with a disability, and 15% as Hispanic. These households also represent all five of Avista service counties in Oregon, and have varying levels of education, race identities, and preferred languages. Chart No. 11 below provides an illustrative summation of the demographic information received from LIRAP households electing to share this information.

Chart No. 11 – LIRAP Household Demographic Responses





When comparing the demographic information obtained for LIRAP participants with 2020 Census¹⁸ data for the counties that Avista serves in Oregon, there are many observations to be made. When considering race, for example, Census data shows that within the five counties that Avista serves, the average percentage of Hispanic or Latino population is 33.4%. Furthermore, the three Oregon counties with the highest population of Hispanic or Latino residents were all counties that Avista serves – Douglas, Josephine, and Union – at 37.9%, 37.1%, and 36.4%, respectively. When compared to the voluntary demographics collected, even if all LIRAP participants who selected “Multi-Race” or “Other” were Hispanic or Latino customers, there would still only be a representation of

¹⁸ Obtained from [Census.gov](https://www.census.gov)

around 12%; this is significantly lower than the overall Hispanic or Latino population in Avista’s service territory. This variance is noteworthy because this population represents the second largest race demographic in Oregon, as well as the second most preferred language (Spanish). While there are many other factors that could be contributing to this difference, including low demographic response rates, Avista continues to track and analyze the data it receives from customers in order to identify opportunities for program improvement – in this case, to broaden its outreach efforts, improve language accessibility, and establish partnerships with agencies that serve the Hispanic and/or Latino communities in Oregon.

Program Funding

Since the inception of LIRAP in 2002, revenues for the program have been collected through a \$0.00451 per therm charge via Schedule 493; this rate has not been changed in over two decades. Additionally, since LIRAP funding was applicable only to residential Schedule 410 customers, these customers were also the only group from which the Schedule 493 per-therm charge was collected. Funding collected through this mechanism, including interest earned, was then distributed to the Agencies for disbursement to customers and for Agency Admin costs. To balance the timing of the CAA’s receipt of federal funding, which was often not confirmed until after the heating season had begun in October, Avista allowed LIRAP funding to carry over each year so that the Agencies would have assistance funding available should they need it prior to the arrival of their additional funding sources. Under this prior funding structure, LIRAP maintained a carryover balance every year, with amounts left unspent and undistributed to customers in need. This trend is captured in Table No. 4, which depicts the total revenue collections and distribution of funds for the prior eight Program Years.

Table No. 4 – Historical LIRAP Collections and Spend*

PY	Carryover (From Prior Year)	LIRAP Revenues (Sch. 493 collections + interest)	Total Funding (Carryover + Revenues)	Admin (Provided to CAAs)	Net DS Available	Funds Distributed
2021-22	\$45,659	\$235,597	\$281,256	\$45,301	\$235,955	\$210,182
2020-21	\$72,693	\$228,982	\$301,675	\$43,655	\$258,020	\$220,620
2019-20	\$67,110	\$232,804	\$299,914	\$44,932	\$254,982	\$187,378
2018-19	\$57,431	\$231,747	\$289,178	\$45,373	\$243,805	\$179,804
2017-18	\$7,546	\$220,479	\$228,025	\$43,167	\$184,858	\$133,267
2016-17	\$26,211	\$224,315	\$250,526	\$43,918	\$206,608	\$199,062
2015-16	\$31,935	\$223,903	\$255,838	\$43,837	\$212,000	\$185,798

2014-15	\$24,563	\$201,860	\$226,423	\$39,522	\$186,902	\$154,967
Average	\$41,644	\$224,961	\$266,604	\$43,713	\$222,891	\$183,885

With the conclusion of the 2021-2022 PY, LIRAP’s funding structure began to evolve much like the rest of the LIRAP elements and administrative process. This new structure, as well as the positive customer and administrative impacts it created, will be outlined in the following section.

New LIRAP Funding Structure

With the passage of HB 2475 – and, with it, the transition of Avista’s formerly grant-based LIRAP into a jointly-administered income-based discount model with corresponding arrearage assistance options (AMP and AFP) – Avista knew that the prior revenue collection model for LIRAP would no longer provide the resources required in serving its vulnerable customers with the level of assistance needed. As such, and to address the energy burden of the households it serves, Avista bifurcated the collection of revenues used to support LIRAP. The traditional CAA-driven costs – such as AMP funding provided to customers’ accounts because of CAA enrollment, and the Agencies’ Admin expenditures – remained supported through LIRAP’s Schedule 493 revenues. The costs of all incremental expenditures prompted by HB 2475 – i.e., all spend resulting from My Energy Discount (both Agency enrollments as well as Avista) and any Avista-administered LIRAP enrollments (including MED, AMP, and AFP) – were deferred for later cost recovery. The Company received approval to defer these HB 2475 related costs effective February 10, 2022 in Docket No. UM 2232,¹⁹ repeatedly noting its intention to ultimately remedy the LIRAP funding divergence by eventually running all UM 2232 costs through the LIRAP tariff itself.²⁰ Having these two funding streams available to serve LIRAP customers for the 2022-2023 Program Year helped to best serve the new LIRAP offerings in several ways:

No Budget Restrictions. LIRAP’s Schedule 493 has always functioned as a tariff rider with an annual true-up mechanism; however, the lack of overspending and carryover policy in prior years resulted in the Company never having to utilize the true-up option. Having both the Schedule 493 collections as well as the UM 2232 deferral in place for the 2022-2023 PY allowed the funding for LIRAP to holistically

¹⁹ [Docket No. UM 2232](#), February 10, 2022 initial filing

²⁰ [Docket No. UG 471/ADV 23-06-G](#), July 31, 2023 initial filing, pgs. 3-4.

follow the actual energy assistance need within Avista’s service territory. While this principle worked in tandem with joint administration and the new discount-based model – i.e., the CAAs administering the Program alone did not typically spend their allotted budget in prior years, but by adding Avista as a direct administrator of its own Program, as well as the expanded eligibility and increased accessibility discussed previously – the freedom to “meet customers where they are” financially provided for a more impactful Program Year.

Proper Energy Burden Reduction. While the lack of budget restrictions noted above was not necessarily permission for unlimited spending, the absence of a set collections amount or budget threshold gave clearance to provide whatever amount of assistance was needed to properly reduce the energy burden of participating customers.

Comprehensive Tracking of LIRAP Costs. Avista’s UM 2232 deferral (and eventual inclusion of these costs within the LIRAP tariff itself, as noted below) presented the first time that LIRAP administration and Program delivery costs, outside of those provided to the Agencies directly each year, were tracked and recorded in a way that more closely revealed the true financial impacts of offering LIRAP. The deferral also provided a future streamlined process by which adjustments are made to the LIRAP rate to a level more suited to the actual need being experienced by Avista customers each year.

During the 2022-2023 PY, Avista requested to remedy the LIRAP funding separation by amortizing all UM 2232 costs over a 12-month period through the existing LIRAP tariff, Schedule 493, as well as to spread these costs across all retail natural gas customers (instead of only residential Schedule 410 customers, as it was previously). In the Commission’s Order No. 23-394 in Docket No. UG 471²¹, this request was granted effective November 1, 2023. Thus, for the bulk of the upcoming 2023-2024 Program Year, all LIRAP-related costs²² will be run through the LIRAP tariff, providing for one cohesive

²¹ [Order No. 23-394 in Docket No. UG 471](#), entered October 27, 2023

²² With the exception of existing [not incremental] Avista labor expenses associated with the administration of LIRAP, which remain within the Company’s Operations and Maintenance (O&M) costs recovered within the Company’s base rates. Any changes in the allocation of these costs would first require a removal of these costs from base rates, via a general rate case proceeding, and a subsequent proposal to instead run these costs through the LIRAP tariff rider.

funding structure that is more comprehensively representative of the actual funding necessary to adequately support all customers within Avista's Oregon service territory that may be experiencing energy insecurity or related burdens. Complete details regarding this change will be included within the next year's Report, to be submitted by December 31, 2024 for the 2023-2024 Program Year.

Program Year Expenditures

As described above, the 2022-2023 PY was a transitional time for LIRAP, in both programmatic and administrative changes, as well as in the funding structure. With the separation of LIRAP funding into both the tariff and the HB 2475-related deferral, this Report requires an accounting of both to provide a balanced, inclusive financial review of this LIRAP Program Year.

LIRAP Schedule 493

Since LIRAP's primary DS expenditures for the 2022-2023 PY resulted from the incremental changes caused by HB 2475 – in short, the bill discount and anything administered by Avista – the majority of accounting for the Program did not occur within the LIRAP tariff this year. The usual \$0.00451 per therm charge for all Schedule 410 customers was still in place and, as such, collected just over \$242,556 of new revenue to support LIRAP; when combined with the approximately \$7,809 of interest accrued, the total revenue available for distribution was about \$250,366. Additionally, at the end of the previous Program Year, 2021-2022, approximately \$30,764 in DS funds were left undistributed, and thus were carried forward into this Program Year. The combination of these (total LIRAP revenue plus the carryover funding from the prior year) resulted in a total LIRAP balance of approximately \$281,130 for PY 2022-2023. Of this amount, the CAAs were allocated about \$48,189 for Admin for the Program Year, and after subtracting this Admin from the total revenue and interest, the remaining net funds available for direct services to customers for the 2022-2023 PY was just above \$232,940. Of this available balance, Agencies spent approximately \$15,778 in the provision of direct services; such low spend makes sense during this transitional year, as the implementation of My Energy Discount, and all associated costs, were tracked and recorded within the HB 2475 deferral rather than distributed from tariffed funds.

As with LIHEAP, any credit balance on a closed customer account due to a LIRAP payment may be transferred to another open Avista account belonging to that customer,

or to the customer’s closed account if they have such an account with an outstanding balance. When the customer no longer has an active account with Avista, the credit balance that results from a LIRAP grant is returned to the LIRAP general fund and redistributed to the Agencies. On September 30, 2023, approximately \$2,508 was returned to LIRAP due to such adjustments for closed accounts, resulting in a total tariff spend of approximately \$63,697 and a remaining unspent balance of about \$219,670.

Table No. 5 – LIRAP Schedule 493 Funding Summary, 2022-2023 PY

DS Carried Over from Prior Year (2021-2022 PY)	\$30,764
Total Sch. 493 Funding (Revenue + Interest)	\$250,366
Admin Paid to Agencies This Program Year (2022-2023 PY)	\$(48,189)
DS Funds Disbursed by Agencies This Program Year	\$(15,778)
Net Funds Available for Direct Services	\$217,162
Adjustments – Dollars Returned to the Program	\$2,508
Funds Remaining (end 2022-2023 PY)	\$219,670

HB 2475 Deferral

As noted, the majority of LIRAP’s 2022-2023 PY funding was tracked and reported through the HB 2475 deferral.²³ On July 31, 2023, Avista requested to amortize all costs recorded under this deferral through the LIRAP tariff Schedule 493, over a 12-month period²⁴ and, as such, all future financial reporting for LIRAP will involve only Schedule 493 narrations. For this Program Year, however, LIRAP was funded by a combined effort through the existing tariff collections as well as all spending tracked within the HB 2475 deferral. In total, about \$1,329,524 was recorded as DS spend during the 2022-2023 PY, while costs related to Avista’s administration and marketing for the Program Year were approximately \$195,622 – the majority of which were communication expenses, incremental labor costs, and postage related to direct marketing of LIRAP programs. These activities are outlined in the section titled *Outreach & Engagement*. Table No. 6 below provides a brief summation of the LIRAP expenditures contained within the HB 2475 deferral, with recovery via Schedule 493 beginning November 1, 2023.²⁵

²³ [Docket No. UM 2232](#).

²⁴

²⁵ Note: due to the timing between the amortization request ([Docket No. UG 471](#)) and this Report, deferral numbers presented will not match as this Report is based on PY and the prior request contains data as of its filing date.

Table No. 6 – HB 2475 Deferred LIRAP Funding, 2022-2023 PY

LIRAP DS Funds Distributed	\$1,329,524
Avista Admin	<u>\$195,622</u>
LIRAP Program Year expense (HB 2475)	\$1,525,146

Administration and Program Delivery

Avista

In its first full year of jointly administering LIRAP, Avista spent nearly \$195,622 in support of the program; with the majority of these expenses being communications-related, further description of these efforts is detailed on pages 28-33 of this Report. While not a line item in Avista’s administrative spend for the 2022-2023 Program Year, it is worth noting that joint administration of LIRAP has significantly increased the scope of work conducted by Avista CSRs. This workload was first distributed amongst the Customer Assistance Referral & Evaluation Services (CARES) team, who support all vulnerable Avista customers, including those with high energy burdens. Then, in August of 2022, Avista identified 10 CSRs to establish a new team – Bill Assistance Support & Enrollment (BASE) – as well as a BASE Team Lead. This team received in-depth training on LIRAP, including program eligibility, enrollment processes, and interfacing with other forms of energy assistance. They also spent a portion of their training with CAA staff to better understand the culture of poverty and develop strategies for serving income-constrained customers and their unique challenges. Establishing a team of knowledgeable and caring CSRs has been a critical piece of Avista’s strategy for joint administration.

In addition, Avista hired and onboarded a new LIRAP Program Manager in June of 2023. The previous Program Manager moved into a new role within the Company in January of 2023, yet continued to oversee LIRAP throughout the approximately 6-month position vacancy. Avista finished the 2022-2023 Program Year with a full, trained staff that will continue to support and administer LIRAP into the upcoming Program Year and beyond.

Agencies

Avista continued to provide Admin to the Agencies as prescribed in its LIRAP tariff, which allows up to 21% of the total low-income bill payment assistance funds collected

via Schedule 493 to be provided to the CAAs for administration and Program delivery. With the tariff revenues remaining consistent, despite the funding transition to support the new Program components, a total of \$48,189 (19.25% of Schedule 493 revenue collections and accrued interest) was distributed to the Agencies for 2022-2023 PY Admin. This amount, when combined with the \$68,724 in Admin carried over from the previous reporting Program Year, totaled \$116,863 available for CAA Admin during the 2022-2023 Program Year.

At the time of this Report’s filing, the amount of Admin reported as spent by the Agencies from LIRAP funds (as of September 30, 2023) remains incomplete, as reporting from one of the Agencies has not been provided for the month of September. The funding has been distributed to the Agencies and can be carried forward into the next Program Year to cover Admin costs for the associated undistributed DS funding. Table No. 7 below represents a recap of the Admin funding spent during the current Program Year and the estimated amount available based on the reporting that was provided by Agencies on September 30, 2023.

Table No. 7 – LIRAP Agencies’ Admin Funding, 2022-2023 PY

Admin Carried Over from Prior Year	\$68,724
Admin Paid to Agencies for 2022-2023 PY	<u>\$48,189</u>
Net Funds Available	\$116,913
Funds Spent by Agencies for 2022-2023 PY	\$73,162 ²⁶
Unspent Funds, September 30, 2023	\$43,751
Percent Unspent in Comparison to Available Funds	37%

Outreach & Engagement

Stakeholder Meetings

As previously noted, HB 2475 and the associated Commission Staff engagements brought with them significant requirements for interim and future action with regard to assistance programs for utility customers. These new conditions made it necessary to increase the frequency of meetings between Avista and its Agency partners from

²⁶ The reported spend in Table No. 7 includes reporting from the Agencies serving Jackson, Klamath, Josephine, Douglas and Union counties with the exclusion of the Admin spend for Jackson County for the month of September; Admin spend reports had not been received from the Agency serving Jackson County for September, 2023 at the time of this Report submission.

quarterly to monthly, as reported in the 2021-2022 LIRAP Report. This monthly cadence continued throughout the 2022-2023 PY, with the following purposes:

1. Support, advise, and maintain engagement with the CAAs through the transformational programmatic changes and My Energy Discount implementation;
2. Collect feedback from CAA energy staff and administrators and respond accordingly;
3. Provide regular updates on Program enrollments, outreach and marketing efforts, and other data relevant to CAAs.

These meetings are held in recognition that the CAAs are critical partners for successful Program delivery and, as such, connections are made at a frequency appropriate for Program-level discussions. Additionally, the CAAs are an essential part of connecting customers to other programs to help stabilize the household – such as weatherization, rental and water assistance, and food security. During the 2022-2023 PY meetings, the Company reported various LIRAP metrics, including enrollments, saturation rate, credits and average balances for the AMP, and more. The Company also shared updates on marketing and outreach tactics, and engaged CAA staff in discussions about program effectiveness and enhancements.

Avista also convened stakeholders of Docket No. UM 2211 during the 2022-2023 PY to provide program updates and obtain feedback. In February 2023, the Company invited all interested parties to a workshop that included a report-out on the first quarter progress of the LIRAP bill discount and associated arrearage assistance, a marketing and outreach update, and a report on the results of the My Energy Discount participant survey.

Marketing & Outreach

Throughout PY 2022-2023, Avista continued marketing activity to raise awareness about its billing and payment options, including the availability of bill assistance. We also conducted a My Energy Discount Participant Survey to better understand the experience of those enrolled in My Energy Discount. Finally, we conducted Agency referrals and collections callouts to ensure customers experiencing financial difficulty were connected to bill assistance programs. These activities are outlined below.

Supporting Customers in Crisis

To improve connectivity to assistance options, the Company maintains an Agency referral process that ensures that customers in need are being provided with appropriate resources to obtain such assistance. Any time a customer indicates to Avista that they have been referred to seek energy assistance, are actively seeking assistance, or have an appointment for assistance, an Agency Referral is created. This referral sends the customer's contact information to their local Agency in a daily or weekly referral report. At the time this referral is created, any active collections on the customer's account are also suspended for 30 days to allow the customer time to connect with the appropriate assistance needed. Each CAA then attempts to reach the customer to offer such assistance. Customers are allowed one Agency Referral per Program Year. Of those referred, 26% end up receiving energy assistance within 90 days of the referral.

During the 2022-2023 Program Year, Avista's CARES team conducted callouts to customers who were enrolled in MED and whose accounts had gone into collections. These "Collections Callouts" consisted of a CARES representative attempting to contact AMP/AFP eligible customers after the final notice went out to enroll them in one of these arrearage assistance programs, and to cancel collections on the account. If a customer was not eligible (i.e. already received the benefit), or if CARES wasn't able to connect with the customer, then the collections process went on as normal. Customer callouts, as well as Agency referrals, are built into customer service processes as a means for avoiding service disconnections and ensuring that in moments of crisis, customers are aware of, and have access to, options for support.

My Energy Discount Customer Participant Survey

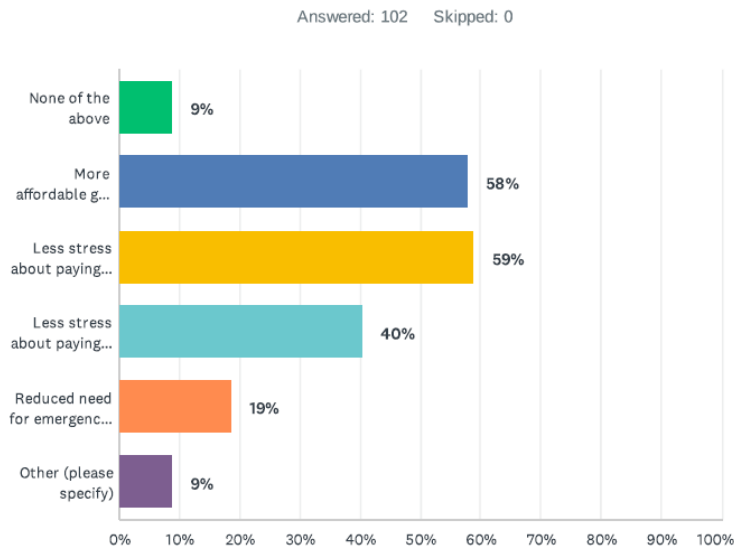
In April 2023, Avista administered a survey to My Energy Discount²⁷ enrollees with the following objective: *Obtain feedback from My Energy Discount participants about their overall satisfaction and whether their monthly bill discount has provided financial relief with improved confidence for ability to pay their bill.* The survey was promoted via email to all active participants utilizing a secure and anonymizes online survey mechanism, and 102 customers ultimately completed the survey. Of those that responded, 81% were either *very satisfied* or *satisfied* with their discount, and 90% described the enrollment

²⁷ As referenced on page 3 of this Report, My Energy Discount was previously named "My Energy Rate", and was referred to by that original name at the time the survey was conducted.

process as either *very easy* or *easy*. The figure below illustrates the impact that respondents expressed the program had on their household.

Figure No. 1 – MED Participant Survey

Q4 In which of the following ways has My Energy Rate impacted your life?
Please select all that apply.



ANSWER CHOICES	PERCENTAGE	RESPONSES
None of the above	9%	9
More affordable gas bill	58%	59
Less stress about paying gas bill	59%	60
Less stress about paying other bills or expenses	40%	41
Reduced need for emergency bill assistance from a community agency or other source	19%	19
Other (please specify)	9%	9
Total Respondents: 102		

The survey also included a question regarding the name of the program, where 74% of respondents indicated that “My Energy Discount” is more suitable, and just 17% recommended keeping the name at “My Energy Rate.” As a result of this feedback, and to align with the Washington bill discount program launching in October 2023, planning began to officially change the name of the Oregon bill discount program from My Energy Rate to My Energy Discount effective October 1, 2023.

Marketing Strategy

Connections Newsletter

Since the onset of the pandemic in 2020, the Company has included bill assistance messaging in its monthly newsletter, titled *Connections*, that is included with mailed bills. This practice continued throughout the 2022-2023 PY, with the print version of the newsletter being distributed to 63,678 OR residential customers and the *eConnections*, the digital copy, going to 62,906 customer emails. The images provided are examples of some of the key messages featured.



Need help with your energy bill?

Customers who need help paying their home energy bill may be eligible for a bill discount. If you qualify, applying is fast and easy. Learn more at myavista.com/myenergyrate or call us at (800) 227-9187.

Looking for energy bill assistance?

We have options. Avista partners with community agencies to provide financial assistance, plus we offer other services to help you manage and pay your bill.

Energy Assistance grants are available for income-qualified residential customers. Funds are distributed to qualifying customers through local community agencies — please call us at (800) 227-9187 to find your local community agency or visit us at myavista.com/assistance.

Comfort Level Billing divides yearly energy costs into 12 equal and predictable monthly payments.

Preferred Due Date helps align your bill's due date with your payday.

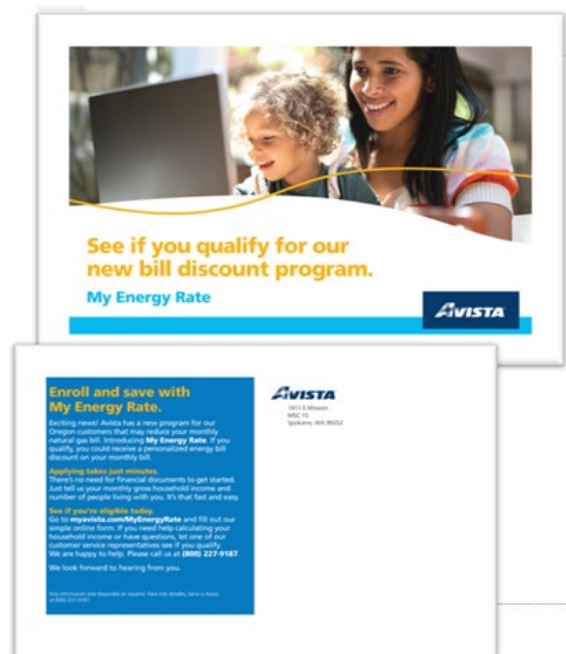
Payment Arrangements can be made on an individual basis for those in need.

We're here to help.



Direct-Mail & Email Marketing

In addition to these monthly newsletters, Avista also conducted direct customer marketing through email and direct-mail campaigns during the 2022-2023 PY. The direct-mail campaign, which began in November of 2022 and continued strategically through May 2023, sought to reach unenrolled customers who may be eligible for energy assistance. This campaign distributed a total of 11,929 customer letters and 10,677 postcards during the timeframe that it was active.



An email campaign was also initiated in December 2022 and ran through April 2023. This campaign had a similar goal of reaching unenrolled customers who may be eligible and consisted of 6,951 total sends.

Bill Inserts & Messaging

Because one of the primary means of communication from Avista to our customers are the monthly bills that we distribute, we also share energy savings opportunities through this venue. In May 2023, Oregon residential customers who continue to receive their bills in the mail (approximately 100,111 customers) also received an insert in their bill that highlighted the new My Energy Discount program. These same customers also saw a message on their Avista bill every month between October 2022 and September 2023, with the exception of June 2023, that was some variation of the following: *We're here to help! These can be challenging times, so if you're facing financial difficulties, please reach out to us by calling (800)227-9187 or email us at ask@myavista.com.* During the 2022-2023 PY, a total of 1,116,794 bills were mailed to Oregon customers, each of which encouraged them to contact Avista if they were experiencing difficulty paying their bill.

Website Update

For customers who visited Avista's website (www.myavista.com), a promotional call-to-action bill assistance creative was featured during seven of the twelve months of the Program Year. In the summer of 2023, Avista updated its bill assistance webpage (www.myavista.com/assistance) to include a Spanish-translation option, and also improve the user experience. Customers can now find a helpful community action agency search tool, billing and payment options, billing and usage insights, and more.

Participating Community Action Agencies

- Community Connection of Northeast Oregon serving Union County
- ACCESS serving Jackson County
- United Community Action Network (UCAN) serving Josephine and Douglas Counties
- Klamath Lake Community Action Services serving Klamath County

Data Collection

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

- LIRAP Database,
- CC&B (Avista Utilities' information management data base), and
- Community Action Agency records

This Report was a collaborative effort of Avista staff and Agency partners. Agency staff provide monthly reporting in aggregate, representative of those they have served with LIRAP, in addition to a comprehensive quarterly Administrative and Program Delivery spending report.

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

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