



# Oregon

Kate Brown, Governor

**Public Utility Commission**

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July 14, 2020



BY EMAIL

Avista Corporation, dba Avista Utilities

Shawn.bonfield@avistacorp.com

RE: Advice No. 20-04-G

At the public meeting on July 14, 2020, the Commission adopted Staff's recommendation in this matter docketed as ADV 1134. The Staff Report and a receipted copy of the sheets in your advice filing are attached.

Nolan Moser

Chief Administrative Law Judge

Public Utility Commission of Oregon

(503) 378-3098

ITEM NO.

**PUBLIC UTILITY COMMISSION OF OREGON  
STAFF REPORT  
PUBLIC MEETING DATE: July 14, 2020**

REGULAR \_\_\_\_\_ CONSENT  X  EFFECTIVE DATE  July 25, 2020

**DATE:** June 30, 2020

**TO:** Public Utility Commission

**FROM:** Kathy Zarate

**THROUGH:** Bryan Conway, Michael Dougherty, John Crider, and Matthew Muldoon **SIGNED**

**SUBJECT:** AVISTA UTILITIES:  
(Docket No. ADV 1134/Advice No. 20-04-G)  
Application to change the language regarding customer eligibility in the  
Company's tariff Schedule 493.

**STAFF RECOMMENDATION:**

Approve Avista Utilities' (Avista) filing Advice No. 20-04-G, effective with service on and after July 25, 2020, as requested.

**DISCUSSION:**

Issue

Whether the Public Utility Commission of Oregon (Commission) should allow Avista to modify the language of Residential Low Income Rate Assistance Program (LIRAP) program, and associated with tariff Schedule 493.

Applicable Law

The Commission may approve tariff changes if they are deemed to be fair, just, and reasonable per ORS 757.210. Tariff revisions or corrections may be made by filing revised sheets with the information required under the Commission's administrative rules, including OAR 860-022-0005 and OAR 860-022-0025. OAR 860-022-0025(2) specifically requires that each energy utility changing existing tariffs or schedules include in its filing a statement plainly indicating the increase, decrease, or other change

made with the filing, the number of customers affected by the proposed change and the resulting change in annual revenue; and the reasons or grounds relied upon in support of the proposed change.

Filings that make any change in rates, tolls, charges, rules, or regulations must be filed with the Commission at least 30 days before the effective date of the change. ORS 757.220; OAR 860-022-0015.

### Analysis

Avista filed Advice No. 20-04-G on June 26, 2020. The purpose of the filing is to make modifications to the language in the Low Income Rate Assistance Program (LIRAP). Avista's LIRAP program eases the energy burden on limited income customers. The advice filing will allow Community Action Agencies ("Agencies") within Avista's service territory the utmost flexibility when determining eligibility for low-income programs. The language in Schedule 493, Special Condition 3, currently states, "Income Eligibility will be determined by the respective agencies and will be consistent with the eligibility determinations for state low-income energy assistance programs". The advice filing proposes to change this language to read, "Customer eligibility for LIRAP is determined in cooperation with the agencies and captured in the LIRAP Guidelines."

Hence, and according to the company,

[T]his change will maintain the current alignment with state low-income energy assistance programs, but also provide the Agencies with the discretion to determine eligibility based on existing participation in adjacent income-qualified [non-energy] programs such as Temporary Assistance for Needy Families (TANF), Supplemental Security Income (SSI), and Supplemental Nutrition Assistance Program (SNAP, formerly Food Stamps).<sup>1</sup>

The Company also states that it continuously strives to provide its Agencies with an open and adaptable low-income program and as the impacts of the COVID-19 pandemic remain widespread. The Community Action Partnership of Oregon (CAPO) requested and supports this change.

The filing contains additional changes that are housekeeping in nature. Avista has adjusted the maximum percentage available for total program administration and

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<sup>1</sup> Avista's filing, Docket ADV 1134, June 25, 2020, Page 2.

delivery costs from 21.78 percent to 21 percent<sup>2</sup> as part of these housekeeping updates. This alteration does not reflect a change in process, as 21 percent has been the benchmark utilized by the Agencies for the past several years. Instead, this update is for clarification purposes and alignment with the Company's Washington LIRAP. However, there are no proposed changes to any customer rates or charges in this filing.

### Conclusion

Staff supports Commission action to approve the Company's filing.

### **PROPOSED COMMISSION MOTION:**

Approve Avista's Advice No. 20-04-G to go into effect for service rendered on and after July 25, 2020.

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<sup>2</sup> Avista's page 3, schedule 493.

AVISTA CORPORATION  
dba Avista Utilities

SCHEDULE 493

RESIDENTIAL LOW INCOME RATE ASSISTANCE PROGRAM (LIRAP)-  
OREGON

PURPOSE:

The purpose of this schedule is to adjust rates in Schedule 410 – General Residential Natural Gas Service – Oregon, to generate funds to be used for bill payment assistance for Avista’s qualifying low-income residential customers, in accordance with ORS 757.315.

APPLICABLE:

To all residential Customers in the State of Oregon where the Company has natural gas service available. This Residential Low Income Rate Assistance Program (LIRAP) Adjustment is applicable to all residential customers taking service under Schedule 410.

MONTHLY RATE:

With Gross Revenue Factor: \$.00451 per therm  
Without Gross Revenue Factor: \$.00438 per therm

SPECIAL CONDITIONS:

1. Each month, the Company will bill and collect low-income bill payment assistance funds from all Residential Customers. By the 10<sup>th</sup> of the month following the billing month, using the Company’s internal cashless voucher system, the Company will determine and send the monthly voucher amount showing the Program funds available to each participating Community Action Agency. By the 20<sup>th</sup> of the month following the billing month, the Company will remit payment to each Agency for allowed administrative and program delivery costs. Each agency will process client intake, authorize payments, and provide the Company with a payment report. Based on this payment report, the Company will transfer the authorized payments to the individual customer’s utility account.

(continued)

Advice No. 20-04-G  
Issued June 25, 2020

Effective For Service On & After  
July 25, 2020

Issued by Avista Utilities  
By



Patrick Ehrbar, Director of Regulatory Affairs

Received  
Filing Center  
JUN 25 2020

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AVISTA CORPORATION  
dba Avista Utilities

SCHEDULE 493 (continued)

RESIDENTIAL LOW INCOME RATE ASSISTANCE PROGRAM (LIRAP)-  
OREGON

- 2. The Company will compute interest each month based on the average monthly fund balance undistributed at the company's currently authorized rate of return.
- 3. The Company is responsible for program administration and funds distribution to qualifying local agencies in accordance with terms and conditions ("Guidelines") established by the Company and the entity. All funds collected under this program, less program administration and delivery costs paid to the individual agencies, are distributed to income-eligible Residential Customers of Avista Utilities. (T)
- 4. Total program administration and delivery costs shall not exceed 21 percent of the total low-income bill payment assistance funds collected. Utilization of program administration and delivery costs will be summarized in the annual evaluation report described herein (Special Condition 6). (C)  
(D)  
(T)  
(T)
- 5. Customer eligibility for LIRAP is determined in cooperation with the agencies and captured in the LIRAP Guidelines. (T)  
(T)
- 6. The Company will provide an annual summary evaluation report on the progress of the LIRAP for review by the Commission by December 31<sup>st</sup> following the end of each program year.
- 7. The LIRAP program year is October 1<sup>st</sup> through September 30<sup>th</sup>. (T)

RULES AND REGULATIONS:

Service under this schedule is subject to the General Rules and Regulations contained in the tariff of which this schedule is a part, and to those prescribed by regulatory authorities.

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