



Oregon's Poverty Fighting Network

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Public Utility Commission
Attn: Filing Center
P.O. Box 1088 Salem
OR 97308-1088

RE: Comments on Avista's bill discount proposal – ADV 1410, Avista Corporation's Advice No. 22-03-G

The Community Action Partnership of Oregon (CAPO) submits the following comments regarding Avista's interim low-income bill discount program (bill discount). We appreciate the opportunity to comment on Avista's bill discount proposal. One of the main purposes of the Energy Affordability Act (HB 2475 2021) is to reduce disparate energy burdens, with income being one of the main pathways of measurement. We want to emphasize the importance of continuing to investigate a range of options to address energy affordability, including percent of income payment plans and considering factors beyond income that make families energy insecure. We appreciate Avista's pro-active engagement with stakeholders and commitment to program evaluation to inform long-term program design. In the following, we offer comments on the bill discount proposal, informed by our experience in serving diverse populations with low incomes all across the state of Oregon.

Eligibility and Outreach

We appreciate the effort to make eligibility and enrollment as easy as possible. Auto-enrollment is a good step to enroll people as unbureaucratically as possible. We encourage Avista to work with Oregon Housing and Community Services (OHCS), Department of Human Services (DHS), and other state/federal agencies to receive information about eligible individuals and offer them discounted electricity. Available programs (e.g., bill discount, arrearage management, grants) should be clearly described (in plain language and containing actual numbers) on Avista's website so customers can have a good idea of whether reaching out for help is worth their effort. Unfortunately, this is currently not the case.¹ Instead of saying, "Payment Arrangements can be made on an individual basis for those in need," the website should clearly state what low-income customers are entitled to, for instance the current AMP. Furthermore, the information should be easy to find.

We also encourage Avista to work with community action agencies (CAA) to allow them to directly enroll their clients through an online tool. Collaboration of this type is essential to capture customers who are least likely to enroll in the assistance programs they need due to language barriers, lack of capacity,

¹ [https://www.myavista.com/your-account/power-of-compassion/oregon-assistance;](https://www.myavista.com/your-account/power-of-compassion/oregon-assistance)
[https://www.myavista.com/your-account/need-other-payment-options.](https://www.myavista.com/your-account/need-other-payment-options)

mistrust, or other factors. If CAAs shoulder a large part of the outreach burden, we think that the program should include some outreach funding for these organizations, so that outreach efforts are consistent and sustainable.

The need for collaboration with organizations in the community for outreach is underlined by up-to-date performance of Avista's AMP. Despite nearly 10,000 customers with arrears, many of them presumably low-income, enrollment in the AMP has only reached 30 as of July 14.

Income Verification

We commend Avista's intake process that relies on self-attestation. Income verification is often burdensome to eligible individuals and expensive to administer, thereby excluding those who need it the most. We encourage Avista to make participation in the program relatively risk-free, for instance by not requiring paybacks for individuals, who fail income verification, and allowing them to re-enroll if their income changes.

We recommend that Avista adopt an approach to income verification (3% random sample) that recognizes how intrusive such a process can be on individuals' lives and recognizes individuals' variable capacity to participate in such a process. Important barriers to consider include: not being able to produce required paperwork, highly variable income, language barriers, privacy concerns due to experiences of domestic violence or immigration status, or lacking capacity to engage in such a process due to various medical conditions. We recommend, as currently proposed, to work with CAAs, that have experience in conducting income verification in a respectful and culturally-appropriate manner, to implement this part of the program. Proper enumeration would include funding to conduct income verification and outreach. Currently, average costs for income verification, including various fixed components, run around \$50. We recommend that Avista engage with stakeholders before implementing any income verification. Such engagement should touch on the modalities used and documentation required for verification.

Level of Relief

We commend that Avista's discount tiers are based on a detailed assessment of energy burdens. Current levels seem sufficient to offer significant relief to families in all income groups.

Considering average stock market returns compared to PUC-approved return on equity, we would urge Avista to consider that all company stakeholders, including shareholders, should contribute to the goal of reducing disproportionate energy burdens. For instance, a fixed portion of the company's profits could be set aside for helping low-income people in the community that generates these profits. In meetings, Avista has repeatedly pointed at their ProjectShare as such a mechanism. We are unclear on how much executives and shareholder actually contribute to that fund, and how large this fund is. If possible, we would like Avista to report these numbers so we can have a more informed discussion about this.

We appreciate that Avista's proposal combines the bill discount with a program to manage arrears, streamlining the various components. This is beneficial to customers, who can avoid disconnections, stress, and impacts on credit, as well as to Avista, who can reduce its amount of uncollectible debt.

Tracking and Accountability

We believe that the best way to ensure the bill discount program works effectively is to include reporting requirements in the tariff filing, as Avista does. In our view, a successful program would enroll at least 80% of eligible customers in the long run. Since non-participants are paying for the program, eligible but non-enrolled customers will be subsidizing those enrolled. This would create a situation with obvious ethical problems and is best avoided. We rejected the idea, stated by an Avista team member during the presentation on July 12, 2022, that 50% is the highest possible participation rate in any program. For instance, nearly all income-eligible people in Oregon participate in SNAP.

Enrollment numbers should be reported quarterly to the public for at least five years (instead of one). It will take more than one year for the program to reach maturity. In this phase, we need regular updates to see that adequate progress is made. These updates should also include details on the outreach activity undertaken. To ensure equitable roll-out, some basic demographic data should be captured during program enrollment. While post-launch stakeholder engagement and surveys are important, it is also important to be mindful of the already disproportionate time burdens that our society places on people with low incomes.

Connecting Customers to Other Services

We appreciate Avista's commitment to referring participants to Community Action Programs, including weatherization services, energy assistance, and other cost-free benefits. To streamline this process, we suggest to refer all program participants as a default, but allow them to opt-out during sign-up.

Timeline

We urge Avista to make enrollment for the program available BEFORE the start of the heating season in Fall 2022.

Conclusion

We appreciate the interim program that Avista has laid out so far and hope that Avista will continue to work with stakeholders in program design and delivery.

Respectfully,

/s/Benedikt Springer

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