

ITEM NO.

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

REGULAR CONSENT 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).¹

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

¹ Avista's filing, Docket ADV 1134, June 25, 2020, Page 2.

delivery costs from 21.78 percent to 21 percent² 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.

² Avista's page 3, schedule 493.