

Avista Corp.

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June 1, 2022

Public Utility Commission of Oregon Attn: Filing Center 201 High Street SE, Suite 100 Salem, OR 97301-3612

Re: Advice No. 22-03-G – Avista Utilities Low-Income Rate Assistance Program (LIRAP) Bill Discount

Filing Center:

Pursuant to ORS 757.205 and OAR 860-022-0025, Avista Corporation, dba Avista Utilities (Avista or the Company), hereby submits for electronic filing with the Oregon Public Utility Commission (Commission) its proposed modifications to its Tariff Schedule 473, "Residential Low-Income Rate Assistance Program (LIRAP) – Oregon". The Company requests that the following tariff sheets, P.U.C OR No. 5, become effective on <u>August 1, 2022</u>, to allow for an October 1, 2022 go-live date for the program modifications described within this filing:

Revised

Fifth Revision Sheet 493 Fourth Revision Sheet 493A Canceling Canceling Fourth Revision Sheet 493 Third Revision Sheet 493A

New

Original Sheet 493B

The primary purpose of the requested tariff revisions is to introduce a Bill Discount into the Company's LIRAP, consistent with Oregon House Bill 2475 (HB 2475), and to, in turn, replace the existing grant-based LIRAP in favor of an income-based bill discount model for all eligible low-income customers. While the Company looks to retain its current LIRAP Arrearage Management Program (AMP), it also proposes to add an Arrearage Forgiveness offering within LIRAP as a complementary element for customers within the lowest income range, as described in further detail below.

I. <u>BACKGROUND</u>

With the passage of HB 2475 effective January 1, 2022, language under ORS 757.230 was expanded to allow the Commission to include additional factors when establishing rate classifications, including the "differential energy burdens on low-income customers and other economic, social equality or environmental justice factors that affect affordability for certain classes of utility customers." With this guidance in place, Commission Staff (Staff) opened Docket No. UM 2211, and with it outlined the framework and timeline expected for utilities to implement differential rate programs in response to HB 2475. This framework required that natural gas utilities provide near-term relief to its customers by way of: 1) interim action proposals that provide income-eligible customers with an AMP or other enhanced bill assistance program, or explanation of existing offerings that meet the criteria by February 28, 2022; and 2) proposal of a differential rate program to become effective within the fourth quarter of 2022. In addition to these expedited customer support options, the timeline also provides for a broader investigation into the implementation of HB 2475 through which the Commission will more comprehensively explore and establish its policies regarding differential rates, including program design and administration.¹

In accordance with Staff's timeline, Avista filed its "Explanation of Existing Interim Action" in Docket No. UM 2211 on February 28, 2022, after having collaborated with its partner Community Action Agencies (CAAs or Agencies) and other interested stakeholders regarding the Company's planned approach. Continued conversations with its CAAs regarding its existing LIRAP, however, led to the development of several proposed modifications to its LIRAP AMP, which were then presented to the Agencies, as well as UM 2211 stakeholders, as part of Avista's 6-month AMP implementation update on March 30, 2022.² In addition to its proposed AMP modifications, the Company also provided an overview of its existing energy assistance (EA) programs as well as its future proposed LIRAP Bill Discount; the preliminary findings of Avista's

¹ See Docket No. UM 2211.

²https://apps.puc.state.or.us/edockets/edocs.asp?FileType=HAC&FileName=um2211hac134731.pdf&DocketID=23 122&numSequence=31

Low-Income Needs Assessment (LINA) were also presented by Empower Dataworks, as much of this data was used to help inform the design of the Bill Discount.

II. CURRENT LIRAP PROGRAM DESIGN

Avista's LIRAP, administered in partnership with the CAAs within the Company's Oregon service area and available to income-qualified customers at 60% State Median Income (SMI) or below, is currently comprised of two components: Bill Assistance and an Arrearage Management Program. The Bill Assistance portion of LIRAP is a grant-based program designed to be used in conjunction with the Low-Income Home Energy Assistance Program (LIHEAP) and other forms of assistance, as deemed necessary by the administering CAA, to best help the household with their energy costs. For its part, Avista continuously strives to provide the administering Agencies with the utmost flexibility in using their own discretion to best serve customers, including allowing determination of eligibility based on existing participation in adjacent income-qualified [nonenergy] programs such as Temporary Assistance for Needy Families (TANF), Supplemental Security Income (SSI), and Supplemental Nutrition Assistance Program (SNAP, formerly Food Stamps)-often referred to as "categorical eligibility". The AMP, introduced in late 2021 as a long-term solution to ease the energy burden for customers who accumulate a past due balance, is a program that forgives 90% of a customer's past due balance over the course of 12 months as an incentive for on-time monthly payments towards the customer's current bill plus 1/12th of the remaining 10% past due.³ The Bill Assistance and AMP provide customers with options to not only alleviate the burdensome impact that a past due balance can have, but to also lower their energy burden on an ongoing basis so that they may better maintain affordability each month. Additionally, while not a part of LIRAP, Avista's donation-based Project Share is also available to help customers experiencing hardship or an energy emergency (i.e., in jeopardy of disconnect due to non-payment), thereby providing an additional opportunity to help resource-constrained customers handle their basic living costs.

With Avista's recent AMP modifications beginning in April 2022, the Company is now able to offer the AMP to customers with past due balances directly based upon their self-attestation of income rather than requiring an application for low-income assistance to be completed with the

³ See ADV 1254/Advice No. 21-02-G.

Agencies. Alteration of previous program policies, such as the requirement that all forms of energy assistance be exhausted before the AMP is applicable, made it possible for Avista staff to enroll customers in the AMP. Additionally, the temporary suspension of the number of times a customer could qualify for the AMP helped to make the program available to customers who have been unduly impacted by the COVID-19 pandemic and subsequent inflated prices with basic living needs, such as food and gas. In collaboration with its Agency partners, the Company will continue to modify or eliminate administrative barriers and add guidelines intended to improve the customer experience in the pursuance of energy assistance.

III. PROPOSED LIRAP MODIFICATIONS

Eligibility and Level of Relief

As previously mentioned, the passage of HB 2475 opened the door to new opportunities for Avista to serve its low-income customers through offerings, such as bill discounts, that can more appropriately address an individual household's energy burden than its grant-based predecessor programs. Having worked throughout 2021 and early 2022 to develop a Bill Discount program for its Washington service territory, Avista was eager to translate the foundational understanding of the overall design of such a program, as well as feedback received throughout the design process, into a Bill Discount that would best benefit its Oregon natural gas customers. As such, Avista's proposed LIRAP will be comprised of the following three components:

<u>Bill Discount</u>: the Bill Discount will be made available to all self-attested (as described below) low-income customers (up to 60% SMI) and will be composed 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—will be provided with a specified discount percentage, to be deducted from the participating customer's net bill⁴ each month. The Bill Discount will fully replace the existing LIRAP grant. Table No. 1 below shows the percentage discount to be provided to each corresponding income range. These percentages are largely based on analysis provided by

⁴ "Net bill" is defined as all costs incurred by the customer related to the provision of utility service. This includes any charges related to electric or natural gas usage, as well as the basic charge, but does not include any applicable taxes or franchise fees that may be charged by third-party entities such as the city or county in which the customer resides.

Empower Dataworks⁵ regarding the average bill discount amount needed to reduce customer energy burden to 3%. By providing a higher discount percentage to those within the lower income ranges (and vice versa) this design provides a means for prioritizing the lowest income customers with the highest energy burden and a benefit that is more specific to the customer's need.

- 2. <u>Arrearage Management Program</u>: Avista's current AMP offering, inclusive of the April 2022 modifications, will continue for customers at 21-60% SMI. Customers within this income range that are eligible for the Bill Discount, yet have a past due balance on their account, will be offered the opportunity to pay off their arrearage using the AMP for a maximum award of \$500.
- 3. <u>Arrearage Forgiveness</u>: This program will provide arrearage forgiveness for customers at 0-20% SMI. Customers within this income range that are eligible for the Bill Discount, yet have past due balances on their account, will be offered the opportunity to have their arrearage entirely forgiven for a maximum award of \$500.

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

TABLE NO. 1 – PROPOSED LIRAP ASSISTANCE BY INCOME TIER

Qualification and Administration

Avista is already a joint administrator of its LIRAP AMP, providing ease in access to the program by allowing customers to enroll both with the Agencies or with the utility through a simple self-attestation of eligibility (either income or enrollment in income-based program). This attestation can be completed via telephone, online, or print, and consists of a customer declaring their monthly or annual income and/or that they are categorically eligible due to qualification for an assistance program based on their income level (e.g., TANF, SSI, SNAP, etc.). If a customer's

⁵ Empower Dataworks, a third-party consultant specializing in data, informed marketing, and engineering analytical services, was commissioned by the Company in 2022 to perform a Low-Income Needs Assessment, or LINA, for Avista's Oregon service territory. See <u>https://empowerdataworks.com/</u> for more detail regarding Empower Dataworks.

income is above the 60% SMI income threshold and they are not enrolled in an income-based assistance program, yet the customer expresses hardship and inability to afford their Avista bill, the intake worker has the discretion, as an exception to the usual qualification criteria, to enroll the customer in the Bill Discount at the lowest discount tier of 15%. These customers will still be subject to post-enrollment income verification as described below.

As part of its LIRAP modifications, Avista proposes to continue this self-attestation and joint administration for <u>all three</u> of its LIRAP components, however, to only require postenrollment income verification by the Agencies for participants of the Bill Discount component of LIRAP. Allowing self-attestation of income will not only help to reduce the often-burdensome barrier many low-income customers face in obtaining and submitting the necessary paperwork required for income qualification but will also provide relief to the Agencies by spreading the number of LIRAP applications received throughout the program year to a more manageable cadence.

It is important to note that while both Avista and the Agencies will be able to enroll a customer in the Bill Discount, AMP, or Arrearage Forgiveness, it is the Agencies that will conduct the official verification of each applicant's actual income qualifications in order for the customer to remain on the Bill Discount. All customers enrolled in the Bill Discount must complete the required low-income program application and provide the required documentation to their local Agency within the first six months of enrollment; failure to complete the verification process will result in removal from the program. Customers will be notified of this requirement at the time of enrollment and will receive further follow-up notice if an appointment has not been scheduled and/or the verification process is not been completed within the first three to four months of participation. For households enrolled by Avista, the Company will send an enrollment report to the Agencies so that the Agencies can then follow-up with each participant to set up the intake appointment. After a customer has been enrolled in the Bill Discount, and the Agencies have verified the customer's income eligibility, re-certification of income will be required again on or around their two-year enrollment date [two years from the date of the initial income verification]. Collaboratively, the Agencies and Avista will strive for 100% verification of all Bill Discount enrollees for the first year of program implementation. During the verification process, demographic information such as number of individuals in the household, household income, whether the beneficiary is a homeowner or renter, race, ethnicity, education, disability or military

veteran status, whether the beneficiary is a senior (over the age of 60) and preferred language will be captured. This information will help inform who the program is serving and where there are opportunities for targeted engagement. As the experience and understanding are obtained during the first years of implementation, the Company will continue its collaboration with partner Agencies to:

- refine the program design for improved impact,
- determine how to better engage underserved groups,
- modify recertification requirement (i.e., two-year recertification) to serve overburdened individuals and/or groups equitability, and
- reduce the verification requirements to a smaller percentage of enrollees to be audited in the future.

The illustration below provides a visual of the anticipated flow of responsibilities from customer access to a LIRAP benefit to actual enrollment, income verification, and reporting.

ILLUSTRATION NO. 1 – PROPOSED LIRAP ADMINISTRATION RESPONSIBILITIES



To further eliminate barriers to access for customers that are known to have difficulty affording their natural gas bills (as evidenced by historical receipt of EA), Avista also proposes to auto-enroll customers that have received income-qualified EA⁶ within the past 12 months from when the program takes effect (October 1, 2021 through September 30, 2022). The enrollment will be provided at the lowest discount percentage level of 15%, with enrollees receiving a letter explaining the program and all associated conditions for enrollment. More specifically, the letter will detail the requirement that the customer verify their income within six-months of enrollment to remain on the Bill Discount, and that verification can result in a discount amount more

⁶ This excludes Emergency Assistance/Project Share and COVID-specific programs such as the Debt Relief provided pursuant to Docket No. ADV 1237.

appropriately aligned with their actual income; the process by which they can complete such verification; and, how to opt-out in the event that their income level has changed since their recent EA receipt or they do not want to receive the discount. The customer will receive notices reminding them of the six-month verification timeframe and, if no action is taken, the Bill Discount will be suspended. Customers that have been removed from the program due to lack of income verification are still able to apply for the Bill Discount with their local agency at their earliest convenience.

With the incorporation of joint administration for all LIRAP elements, the Company is cognizant of the need to ensure that the Agencies remain appropriately compensated for their continued efforts to engage with Avista customers and provide them with much-needed assistance. Currently, LIRAP tariff revenues are distributed according to the meter count within each Agency's service area. To compensate the Agencies for the administrative and program delivery support activities, the CAAs are paid 20.06% of their monthly revenue allocation. With the transition from a grant-based program to the Bill Discount, this formula for administration and program delivery costs will be maintained. Company staff will continue discussions with partner Agencies to consider alternative compensation models in the future and will apply for approval of such a model if a better method for agency compensation is identified. Additionally, Avista will continue to work with its Agencies to processes and systems required for this transition.

In an additional effort to effectively, and more permanently, decrease customers' energy burdens, the Company will continue to work with its Agencies to ensure that complementary services and cross referrals for energy efficiency and weatherization opportunities are shared with each LIRAP participant. The majority of partner CAAs administer both bill assistance and weatherization and, therefore, have established practices for connecting bill assistance recipients that have high energy use to weatherization services as needed; the one Agency within Avista's service area that does not administer both programs in-house has a process in place for referring clients with high utilization to the entity responsible for managing the weatherization program. Additionally, upon capturing customer attestations for LIRAP enrollment, Avista will refer customers with high energy use to the associated Agency's weatherization program. Internally, the Company will share eligible customer information for referral to its existing Avista Oregon Low Income Energy Efficiency (AOLIEE) program, which provides weatherization services to its lowincome customers. As part of the LINA, further work is also underway by Empower Dataworks intended to inform Avista of other programs or best practices in implementing innovative weatherization program designs capable of reach more participants. Once this deliverable is completed in June 2022, the Company will work with its Agencies, Energy Trust of Oregon and any other necessary parties to coordinate these efforts.

Outreach and Engagement

Avista's strategy for marketing to raise awareness about its Bill Discount and arrearage assistance offerings, as well as the program benefits and ease for applying, is to promote these features through a variety of modalities that include features on the Company's website, flyers and brochures for Community Based Organizations (CBOs) to share with their clients. Additionally, the Company will consider targeted outreach as needed such as postcards, personalized letters and/or phone calls. Avista considers its promotional campaign to be ever evolving, as the level of marketing will need to consider Agency and utility capacity to serve the demand that is inspired by public awareness. As such, the Company plans to be targeted and methodical to ensure a quality customer experience.

In addition to customer communications, the Company will conduct regular meetings with its partner Agencies to collaborate on program implementation, outreach, and marketing, and will work together to make adjustments to such activities as needed. The greater UM 2211 stakeholder group will be convened for program impact updates and to obtain consult for essential refinements to improve engagement.

Tracking and Reporting

Per Staff's recommendations in Docket No. UM 2211, and in alignment with the metrics approved by the Commission in PGE's Docket No. ADV 1365, Avista plans to provide quarterly reporting of several key performance metrics during the Bill Discount's inaugural 2022-2023 program year. After the first year of reporting, the Company will transition from quarterly reporting to instead include this information on an annual basis as part of its LIRAP Report, filed by December 31st of each year in Docket No. RG 51. Information to be reported is as follows, and will be provided by zip code where possible:

- New and cumulative enrollment counts by month
- Benefit and bill statistics, including bill amount, benefit amount, and income range/discount level provided, with details regarding tier saturation by zip code

- Tracking of program costs, direct and administrative (see Cost Recovery section below)
- Customer characteristics such as language preferences, arrearages, history of EA, and medical certificates
- Participant demographics, as previously described, will also be provided for those that have been income verified by the Agencies
- Marketing and outreach activities, including post-enrollment survey data once available

IV. COST RECOVERY

On February 11, 2022, Avista filed its deferral application for expenses associated with offering differential rates to qualifying customers pursuant to HB 2475. This deferral, approved in Order No. 22-099 in Docket No. UM 2232, authorizes the Company to defer for later ratemaking treatment not only direct program costs, but also the administrative and operating costs associated with Avista's proposed Bill Discount. With this deferral in place, the Company will continue to track and record all costs associated with the Bill Discount proposed herein, inclusive of the incremental costs of the AMP modifications made in April 2022, and will request amortization of these costs late in 2023, to become effective with the 2023-2024 LIRAP program year. At that time, it is Avista's intention that all LIRAP costs, inclusive of the Bill Discount, AMP, Arrearage Forgiveness, as well as associated administrative costs, be incorporated into LIRAP's tariff Schedule 493, with future tracking utilizing the existing deferral mechanism in place for LIRAP (Docket No. UM 1978), with an annual true-up of tariff rider balances. Similar to the requirement for electric companies contained within HB 2475 Sec. 7, which necessitates that the costs of these programs be paid by <u>all</u> retail electric customers, Avista intends to make its LIRAP rate adjustment applicable to all retail natural gas customers in this future filing.⁷

Utilizing the estimates provided at its March 30, 2022 update meeting,⁸ Avista calculates that if approximately 3,310 eligible customers participated in the Bill Discount in year one, potentially expending approximately \$1.6 million in LIRAP funds, the average customer using 48 therms would see their average bill of \$68.17 increase to \$69.16 (an increase of \$0.99 or 1.5%). It is important to note that these estimates are meant to provide a <u>high</u> uptake scenario, as they assume

⁷ This includes Avista's Residential, Commercial, and Industrial customers but excludes Special Contracts and Transportation.

⁸ See Footnote 2.

that all participating Bill Discount customers will also receive Arrearage Forgiveness or participate in the AMP; this is, of course, not an accurate assumption as not all Bill Discount participants will also have a past due balance. For comparison purposes, the 2020-2021 LIRAP program year provided 541 energy assistance grants to Avista customers.⁹ Rather than request an increase to the LIRAP rate now based off of purely forecasting the potential impacts of HB 2475, deferring these costs for the first program year will allow proper time for the actual financial impact of these modifications to become better known and will help to mitigate the potential rate impact of the increased participation expected to result from these changes.¹⁰ Additionally, the Company will be able to leverage any LIRAP carryover from the 2022-23 program year to help offset any rate increase that may be needed to recover deferred costs as well as future program costs.

V. CONCLUSION

If the tariff modifications described herein are approved by the Commission, Avista's LIRAP will provide a suite of offerings that, when taken together, "meet our customers where they are at" regardless of their situation. While the AMP and Arrearage Forgiveness will help customers to manage their past due balances by forgiving either a portion of or the full balance, thereby giving the customers a "clean slate" with which to enroll in the Bill Discount, the Bill Discount will then address the ongoing affordability of the customer's bill by reducing current and future balances to a more manageable level that is based on the individual income of the particular household. Prior LIRAP grants did help to accomplish a reduction in customer energy burden, however, the individualized approach of receiving a bill discount more tailored to their actual income level offers a prioritization of benefits for low-income/high-energy burden households that is more specific to each household in need and minimizes oversubscription of benefits to non-energy burdened households. Complementary to LIRAP, customers experiencing hardship or emergency can receive a grant to help stabilize the household through the Company's donation-based program

⁹ See Docket No. RG 51 for Avista's Low-Income Rate Assistance Program Annual Summary Report.

¹⁰ While the transition from a grant-based LIRAP to a bill discount model, coupled with the opportunities for autoenrollment and joint administration for the utility, are anticipated to increase the overall throughput of Avista's LIRAP, the exact impact has yet to be determined. Estimates of potential impact were provided at the Company's March 30, 2022 6-month AMP implementation update (see Footnote 2 (pg. 2) of this filing for link to presentation).

– Project Share. The illustration below provides a visual of the proposed LIRAP program design that will be in effect October 1, 2022 if approved.

	Zero to 60% SMI Bill Discount					
Affordability	Zero to 5% SMI 90% discount	6 to 20 SMI 60% disc		21 to 40% SMI 25% discount	41 to 60% SMI 15% discount	
Past Due	Zero to 20% SMI			21 to 60% SMI		
Balances	Arrearage Forgiveness			Arrearage Management Program		
Hardship/	Customers experiencing hardship or energy emergency					
Emergency	Project Share					

ILLUSTRATION NO. 2 - PROPOSED NEW LIRAP COMPONENTS, 2023-2024 PROGRAM YEAR

Replace grant program with monthly bill discount

Add an arrearage forgiveness for the lowest income group

Continue to support hardship/emergency assistance - Project Share, donation-based program

Therefore, Avista respectfully requests that the tariff changes proposed for Schedule 493 be effective for service rendered on and after August 1, 2022. Though the Company is not requesting any changes in rates at this time, information related to this filing has been included on the Company's website, <u>www.myavista.com</u>, in addition to the promotional activities listed above that will occur upon implementation of the proposed modifications.

If you have any questions regarding this filing, please contact me at (509) 495-7839 or jaime.majure@avistacorp.com.

Sincerely,

/s/ Jaime Majure

Jaime Majure Regulatory Policy Analyst

Enclosures

BEFORE THE PUBLIC UTILITY COMMISSION OF OREGON

AVISTA UTILITIES ADVICE NO. 22-03-G

Tariff Sheets

June 1, 2022

Fifth Revision Sheet 493 canceling Fourth Revision Sheet 493

P.U.C. OR. No. 5

Fourth Revision S

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 energy assistance for Avista's qualifying low-income residential customers, in accordance with ORS 757.315(3) and ORS 757.230, and to describe the various forms of energy assistance available to qualifying low-income customers.

APPLICABLE:

To all residential Customers in the State of Oregon where the Company has natural gas service available. The Residential Low-Income Rate Assistance Program (LIRAP) Adjustment is applicable to all residential customers taking service under Schedule 410, and the energy assistance offered through LIRAP is made available to all income-qualified Schedule 410 customers. Income-qualified is defined as customers with gross household income at or below 60% of Oregon State Median Income (SMI), adjusted for household size, as described herein or established in collaboration with the Community Action Agencies ("Agencies").

MONTHLY RATE:

With Gross Revenue Factor:\$.00451 per thermWithout Gross Revenue Factor:\$.00438 per therm

LIRAP COMPONENTS:

The following energy assistance options may be available for each household within the income range provided:

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

• Bill Discount – the Bill Discount will be applied to a participating customer's monthly net bill, the amount of which is determined by the customer's income range.

(M) material transferred to Fourth Revision Sheet 493A

Advice No. 22-03-G Issued June 1, 2022 Effective For Service On & After August 1, 2022

Issued by By

Avista Utilities

Patrick Ehrbar, Director of Regulatory Affairs

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AVISTA CORPORATION dba Avista Utilities

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SCHEDULE 493 (continued)	
RESIDENTIAL LOW-INCOME RATE ASSISTANCE PROGRAM (LIRAP) – OREGON	
 Arrearage Management Program (AMP) – reduces customer arrearages owed 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, for a maximum award of \$500. 	(N)
 Arrearage Forgiveness – provides arrearage forgiveness for customers with incomes at or below 20% SMI, for a maximum award of \$500. 	(N)
SPECIAL CONDITIONS:	
 Each month, the Company will bill and collect low-income energy assistance funds from all residential customers. By the 20th of the month following the billing month, the Company will remit payment to each Agency for allowed administrative and program delivery costs. 	(T) (D)
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 and \$15,000 in outreach funding to the Company, are distributed to income-eligible residential customers of Avista Utilities.	(M)
 Total Agencies' 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). 	
 Customer eligibility for LIRAP is determined in cooperation with the Agencies and captured in the LIRAP Guidelines, including eligibility and administration of the LIRAP Bill Discount and AMP. 	(N) (M)
(M) material transferred to Original Sheet 493B	
Advice No.22-03-GEffective For Service On & AfterIssuedJune 1, 2022August 1, 2022	
Issued by Avista Utilities By Patrick Ehrbar, Director of Regulatory Affairs	1

P.U.C. OR. No. 5

Original Sheet 493B

AVISTA CORPORATION dba Avista Utilities

SCHEDULE 493 (continued)

RESIDENTIAL LOW-INCOME RATE ASSISTANCE PROGRAM (LIRAP) -OREGON

- 6. The Company will provide an annual summary evaluation report on the (M) progress of the LIRAP for review by the Commission by December 31st following the end of each program year.
- 7. The LIRAP program year is October 1st through September 30th.

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.

(M)

(M) material transferred from Third Revision Sheet 493A

Advice No. 22-03-G Issued June 1, 2022 Effective For Service On & After August 1, 2022

Issued by By **Avista Utilities**

Patrick Ehrbar, Director of Regulatory Affairs