Low-Income Assistance Strategy Review

Options for the design and implementation of ratepayer-funded assistance programs for low-income electricity customers

Prepared for the Ontario Energy Board

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CONTENTS

1. INTRODUCTION

Low-income consumers face a particular challenge when it comes to paying their electricity bills. A monthly electric bill of 800 kilowatt hours (kWh) – the average use for a residential customer – is $133. For a family in Ontario with an annual income of $20,000, this amounts to eight percent of the household's total monthly income (Ministry of Energy 2014). To assist such customers in affording energy, many governments have put in place rate assistance, emergency assistance, and conservation programs designed to assist low-income consumers with managing their energy costs. Ontario has implemented the Low-Income Energy Assistance Program (LEAP), which provides emergency financial assistance, special billing and collection terms and conditions, and SaveONEnergy to assist consumers in reducing unnecessary electricity use.

On April 23, 2014, the Ontario Ministry of Energy (Ministry) issued a letter requiring the Ontario Energy Board (Board or OEB) to report on developing and implementing an appropriate long-term electricity rate-affordability program for low-income electricity consumers (Rate Affordability Program). The Ministry seeks to develop a program that meets the needs of low-income electricity consumers while balancing the need for just and reasonable distribution rates. The Ministry expects the new Rate Affordability Program to complement the existing Ontario LEAP elements. The new Rate Affordability Program is also expected to result in benefits for all ratepayers, i.e., "system benefits," due to reductions in costs from fewer disconnections, reduced delinquent account management expenses, and lower amounts of bad debt losses for electricity distributors.

This report is designed to assist the Board in developing its report for the Ministry on an appropriate electricity rate-affordability program for low-income electricity consumers. This report presents research conducted on low-income energy assistance programs in various jurisdictions in Canada, Australia, the United Kingdom, and the United States. The research is intended to provide examples of low-income energy assistance programs to the Board so that they can be incorporated into the Board's report to the Ministry.

The report is organized such that it presents a summary of the research conducted on the various programs and jurisdictions, followed by an analysis of key program elements such as program design and customer intake, and finally policy options and considerations for the Board to contemplate as it prepares its report to the Ministry.

2. Low-Income Energy assistance in Other Jurisdictions

2.1. Jurisdictions Researched

Programs in the following jurisdictions were researched to prepare this report: Australia on a federal level, Australia's Victoria State, California, Colorado, Illinois, New York, Pennsylvania statewide, Pennsylvania PPL Electric (a distribution utility), Seattle, Washington, the United Kingdom and the United States' federal program known as Low-Income Home Energy Assistance Program (LIHEAP). We also gathered some related information on programs in Indiana, Maine, Massachusetts, New Jersey, Nevada, Ohio, Oregon, Washington, and Wisconsin. This information is presented where applicable in the report itself. Our list of references at the end of the report can assist in finding additional facts about all of these programs.

The jurisdictions we chose for research represent a diverse set of geographical and regulatory conditions resulting in a variety of programs. Geographically, the sample of jurisdictions includes provinces, cities, countries, federal programs, and state programs, all of which are in different locations throughout the world with different climates and populations. From a regulatory perspective, the jurisdictions range in utility structures (i.e., regulated versus deregulated) and in the level of oversight provided by the jurisdiction's electric utility regulatory bodies for the low-income assistance programs. From a program perspective, the selected jurisdictions range from statutorily mandated to utility-created programs and from programs that have been in place for decades to programs that are currently undergoing change to better assist customers. Program funding includes both government budgetary allotments and ratepayer funding. Such a variety of jurisdictions provides a broad assessment of the options available to the Board and Ministry when designing a low-income program for Ontario.

Additionally, the Board requested that this report present information on long-term bill assistance programs fielded by Native Americans in the United States or First Nations and Métis communities in Canada. After researching these types of programs, it was determined that limited information is available for inclusion in this report. However, one example was discovered of a Native American tribe in Oklahoma using its own funds (casino receipts) to fund an emergency assistance program (such as that contained in LEAP). Questions of affordability for these communities are complicated by the remoteness of some settlements, and the lack of a modern power supply in some areas. These issues require targeted research and analysis, and therefore are not thoroughly addressed in this report.

2.2. Research Areas

A specific list of nine research areas and questions was developed to ensure consistent, pertinent information was gathered for each jurisdiction. The nine research areas are identified and explained below. Given the Ministry's letter and the Board's requirements, the research concentrated closely on the customer intake process, how low-income eligibility is defined and determined, and on the program designs. However, useful information is presented on all the research areas.

1. **Reasons for Establishing Low-Income Energy Assistance Programs and Mechanism for Adoption.** Generally speaking, the reason for establishing such programs is to provide assistance to customers in need of support, but there are other purposes, and other benefits of such programs. Related to this are the net benefits of making electricity affordable for all consumers, by improving payment patterns, reducing disconnections, and reducing credit and collections costs. In addition, low-income energy assistance programs have been established through legislation, through a utility's own initiative, and by regulatory action; this determines the mechanism for adoption.

2. **Program Design**. Programs apply different approaches for providing benefits to customers. Emergency and charitable programs (not discussed in this report) provide one-time cash assistance to prevent disconnection or help a family in distress. Energy efficiency and modified credit and collection costs are similarly part of a comprehensive package of policies to address the need for assistance to low-income consumers. In some jurisdictions, aid is provided annually in a lump sum. To provide a more permanent basis of aid for low-income customers, however, longer-term programs with more frequent distribution of benefits have been developed. Programs include flat dollar reductions off the otherwise applicable bill, percent discounts off the bills, and more targeted forms of assistance. Some provide a scale of benefits with the highest aid given to those with the lowest income among those eligible for assistance. The most precisely-targeted programs determine benefits based on the burden that the bill represents of monthly household income (e.g., the percentage of income that the bill represents).

3. **Eligibility requirements**. To ensure that assistance is provided only where it is determined to be needed, most programs allow customers to participate if they meet certain requirements, primarily related to income. A small number of programs have provided assistance to vulnerable customers without requiring a means test. Typically, the regulatory body in the jurisdiction will specify a percentage of some poverty guidelines as the maximum income for eligibility. To simplify administration but retain a means test, eligibility is often based on whether a customer is enrolled in another means-tested program. Eligibility can also be based on additional hardships faced by the customer (disability, medical issues, etc.).

4. **Intake process**. Programs have different processes for identifying, verifying, and enrolling customers into their assistance programs. Depending on the jurisdiction, a utility is not likely to conduct the majority of outreach and intake, and instead relies on government and social welfare agencies that are already performing these functions for other low-income programs. Most recently, utilities have been identifying likely participants by comparing their customer list with lists of beneficiaries of means-tested assistance. Confidentiality must be observed, and programs must decide if the customer is to be given the opportunity to opt in, or opt out, of the utility bill assistance program.

5. **Delivery mechanics/administration**. Low-income assistance programs are delivered by a range of entities including utilities, government departments, utility regulators, social agencies, or some combination thereof. The delivery channel can depend on the type of benefit the customer receives, namely reduced bills or increased income. Customers typically receive increased income from governments directly or through non-governmental organizations that provide various forms of welfare to households.

Reduced bills, by contrast, are generated by the utility. In either case, the utility usually provides credit and collection functions related to utility bill payment.

6. **Funding sources**. Low-income assistance programs are funded through a variety of sources, primarily customer-benefit charges to the utility's rate classes, as well as taxes. Sometimes programs use funds that were gathered as penalties and refunds for unsatisfactory utility behavior, or from payments to open-ended public benefit programs such as regional greenhouse gas initiatives.
7. **How funding levels are established**. Programs can have open-ended enrollment, and budgets are adjusted to meet the enrollment. Some programs have fixed budgets, requiring benefit adjustments, or closing of applications if enrollment becomes too high for the budget. Sometimes the participation targets and the associated funding levels, whether capped or not, are determined by a needs assessment. Even where program enrollment is uncapped, regulators usually supervise the level of spending and may make program changes to adjust the amount of funds dedicated to the program.
8. **Funding dedicated to program administration**. The amount of funding dedicated to program administration is sometimes explicitly limited (e.g., ten percent of all funding) to maximize the benefit to customers, although not all jurisdictions set a specific value. In most utility discount programs (whether or not burden-based), the utility administrative costs are not separated out from other operations and maintenance costs recovered in base rates.
9. **Program results or impacts**. Any information that is available about recent results or impacts of the program is provided (e.g., program uptake, number of people assisted, unanticipated benefits and/or consequences, etc.).

2.3. Methodology

The authors researched each jurisdiction through a literature review and through discussions with staff involved in the oversight of the low-income assistance programs in the respective jurisdictions. Specifically, the authors reviewed state-specific dockets, the United States federal LIHEAP program clearinghouse website, legislation and orders, as well as third-party research reports. All of the documents referenced are provided in the Reference section of this report.

Appendix A provides the detailed results of the research conducted for a number of the primary jurisdictions. These and other jurisdictions are referenced throughout this report in the context of the various policy options, while Appendix A provides the complete information for each state to support the policy analysis and considerations. Further, Appendix B provides the same information for each jurisdiction as provided in Appendix A, but organized by research area rather than by jurisdiction.

3. PROGRAM ANALYSIS

3.1. Reasons for Low-Income Energy Affordability Programs

Background and Historical Development of Assistance Programs

Low-income electricity affordability programs have been developed for many reasons by utilities, utility regulators, and governments. Generally, the reason for such programs is to make essential electricity service more affordable for people without enough money to afford a basic monthly quantity of electricity. Low-income affordability programs result from the recognition that low-income households by definition are unable to pay for all of their basic living expenses. Inability to pay, or difficulty paying consistently, often leads to consumers falling into arrears, becoming subject to collection practices including loss of service, and facing additional barriers in their attempts to have service restored.

Low-income energy assistance programs have been developed for a number of purposes, and the program designs generally reflect the purpose of the program.

Charity and community relations were some of the first types of assistance programs to be offered by utilities. Since the turn of the nineteenth century, utilities on their own motion offered discounts to customers they deemed vulnerable, particularly seniors and the disabled.[1] These offerings might be characterized as part of utility image-building, if not always driven by purely charitable aims.

Government energy assistance programs have also provided benefits to customers for many years. Partly in response to ever-increasing energy costs, governmental welfare income assistance programs have long included electricity service in their definition of necessities. In response to increasing costs for essential energy services, however, governments have developed publicly-funded assistance programs that were specifically designed to address the affordability of electricity and other energy needs. Examples of governmental assistance programs include Australian concessions[2] and allowances, the United Kingdom allowances, and LIHEAP in the United States.

Long-Term Assistance Programs

The Minister, in his letter directing the Board to undertake this research, stated the government's desire "to protect low-income residential electricity consumers" (Ministry of Energy 2014). The government

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[1] Consideration of special hardship circumstances continues to play a role in affordability programs. Proof of fuel poverty is still not necessary to qualify for allowances or discounts in some jurisdictions. This report, however, will focus on the program elements designed to make essential service affordable for low-income customers, in recognition of the gap between their incomes and the costs of essential services such as electricity, and the attendant risk of credit and collection activities and loss of service.

[2] "Concessions" is a term used in Australia to describe discounts or rebates provided to eligible customers for specific necessary goods and services. Some operate in a fashion similar to LIHEAP – a once a year payment to the electricity provider to be applied towards the bill. The Service to Property concession offered by the state of Victoria is a recurring monthly credit that reduces the utility bill to only the cost for energy usage when the total bill is high as a result of the customer service charge.

has already taken steps to address emergency situations, where immediate assistance is needed to forestall disconnection. LEAP eases the burden and complexity of utility credit and collection policies. LEAP also includes coordination with the SaveONenergy Home Assistance Programs delivered by gas and electric utilities, which provides support to low-income households to improve the energy efficiency of their homes. The Minister's charge to the Board points to a component of affordability assistance that is currently missing from the Province's initiatives to protect low-income residential electricity consumers. Emergency assistance, reasonable credit rules, and energy conservation are essential tools, but cannot by themselves assure that electricity will be affordable; a longer-term approach is also needed.

The Minister has asked for options to develop a plan "that meets the needs of low-income electricity consumers while balancing the need for just and reasonable distribution rates" (Ministry of Energy 2014). The experience of other jurisdictions facing this challenge can help inform the range of options available to Ontario.

Utilities, their stakeholders, regulators, and legislatures have in the last 40 years developed assistance and affordability programs that are increasingly more broad and detailed. As utility service became more expensive in the last quarter of the twentieth century, regulators began approving rate discounts and other long-term forms of low-income assistance with costs recovered from ratepayers as a cost of service.

Purposes of long-term utility assistance initiatives have included, without limitation:

- meeting the energy needs of low-income households,
- easing the burden of energy costs on low-income households,
- fostering equality in energy burdens as a percent of household incomes,
- preventing disconnections, mitigating the impacts of price spikes and similar emergencies,
- promoting improved bill-payment behavior,
- reducing utility credit and collection costs,
- maximizing net revenue, and/or
- protecting customers with special needs for electricity.

Affordability Programs and Utility Business Models

A major trigger for introducing or strengthening a low-income affordability program has been a spike in electricity prices. As examples, in Victoria State, a 13.5 percent concession was introduced for off-peak prices when, in the early 2000s, off-peak prices increased sharply. Similarly, the Federal Australian carbon tax legislation included a new Household Assistance Package to assist households to help meet expected price rises due to the introduction of a price on carbon.[3] The Ohio Commission first justified its approval of a percentage-of-income payment plan (PIPP) when the state was faced with an emergency – rising customer bills that put increasing numbers of low-income customers at risk of disconnection.

Another spur to the development of affordability programs was the introduction of retail competition. In the mid-1990s, policy makers in Commonwealth countries, the United States, and elsewhere considered whether to replace the vertically-integrated structure of the electric industry. Many legislatures that deregulated the supply portion of their electric industry included explicit statutory mandates to protect low-income consumers; they were felt to be least likely to benefit from competition, and advocates successfully argued for affordability and efficiency programs to mitigate their expected disadvantage.[4]

Similar protections were built into the National Energy Market (NEM) negotiated by Australian stakeholders, which formed the basis for utility deregulation in that country. The NEM provided for assorted Community Service Obligations (CSOs). CSOs are requirements to deliver targeted assistance to consumers. In the United States, 22 states that restructured their electric utilities industry included a mandate for universal service programs and funding in their restructuring legislation. Where low-income programs were already in place, the legislation preserved or expanded the existing funding for such universal service programs. (NCLC 2014, Section 7.2.7.1, p. 212).

Regulators have also turned to affordability pricing upon observing that traditional credit and collection practices generally do not produce the desired results in the case of low-income customers. A survey of payment-troubled customers of a large Wisconsin utility revealed that only about 14 percent of customers in arrears had sufficient disposable income to pay the bill in response to a shut-off notice (Grosse 2008). Most of the rest of the payment-troubled customers simply did not have enough income to pay for the bare necessities of life.[5] The utility realized that using an unforgiving method to induce payment by those customers was counterproductive.

In line with this insight, the Pennsylvania regulatory commission approved long-term low-income assistance programs for all large electric and gas utilities. The reasons provided by the Pennsylvania commission in approving its burden-based Customer Assistance Program (CAP) are representative of the reasons regulators in the United States initiated or approved such programs:

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[3] With the repeal of the carbon tax effective July 1, 2014, the Australian government revised the Clean Energy Supplement, which had been paid automatically to pensioners, families who receive family assistance, and others on government income support. The Clean Energy Supplement was a "sweetener" added to household assistance when the carbon tax was enacted. Originally proposed to be eliminated when the carbon tax was repealed, it was retained, and renamed the "Energy Supplement." In addition, the rate of payment as of June 30, 2014 was fixed for future payments, rather than increasing in future as had been the case with the Clean Energy Supplement. (Conversation 2014).

[4] As of 2010, 22 states and the District of Columbia had enacted some form of electric and/or gas utility restructuring legislation. None of the United States has adopted restructuring legislation since 2000, and seven states that had initially passed restructuring legislation have retreated through legislation or regulation (Arizona, New Mexico, Nevada, California, Arkansas, West Virginia, and Oklahoma). (NCLC 2014, Section 7.2.7.1, pp. 211-212).

[5] A small number of other customers likely had sufficient funds, but needed help managing a household budget. The utility provided education, information, and referrals for this group to address the underlying reasons for non-payment.

> We, in conjunction with utilities, and social service agencies, have all worked hard to devise ways to [e]nsure that low-income Pennsylvanians have utility services which really are necessities of life as the tragic fire deaths associated with the loss of utility service underlined. . . "However, for the poorest households with income considerably below the poverty line, existing initiatives do not enable these customers to pay their bills in full and to keep their service. . .
>
> Consequently, to address realistically these customers' problems and to stop repeating a wasteful cycle of consecutive, unrealistic payment agreements that cannot be kept, despite the best of intentions, followed by service termination, then restoration, and then more unrealistic agreements, we believe that new approaches like PECO's CAP program … should be tried." (PA PUC v EGC 1990, p. 63).

3.2. Benefits of Low-Income Assistance Programs

Affordable Rates can Bring Higher Net revenues

Another reason for implementing assistance programs is that they can provide benefits not just to the customer participating in the program, but to the utility, to the utility system, and customers in general.

One barrier to more affordable rates has been the misperception that lowering billed revenues to low-income customers automatically reduces a utility's net revenues, and by the same amount. Affordable rates provide savings in many aspects of utility operations. In the 1990s, Roger D. Colton (Mr. Colton), then of the National Consumer Law Center now at Fisher, Sheehan, and Colton, began analyzing how reduced rates to low-income customers created savings in credit and collection costs, working capital, and other costs. These savings have helped demonstrate that low-income assistance is not unreasonably discriminatory, which has led to wider support for such programs. Following the example of energy efficiency cost-benefit analysis, analysts have also identified additional non-energy benefits, which in turn lend further support to the institution of low-income energy programs.

It may appear counter-intuitive, but charging an affordable rate may enable a utility to receive greater net revenues than charging an undiscounted rate. An affordable rate improves the payment patterns of the participating customers; a greater percentage of participants pay a higher percentage of their bills than do non-participants. This in turn can lead to higher total net payments; a higher percentage paid of a lower bill can produce more revenues than a lower percentage paid of a higher bill. More customers can and do pay the affordable bill than the unaffordable bills. Results from impact analyses of two affordability programs provide an example of this effect, as summarized in Table 1, below. In one study, the analyses confirmed that it is possible to charge less to a customer group and receive more revenue. (Colton 2010, Table 19).

Table 1. Billings and Revenues under Utility Rate Affordability Program – Citizens Gas and Coke (2007)

Population	Billed Revenue	Collected Revenue	Collected Revenue / Billed Revenue
Customers on Discounted Rates	$273,527	$215,897	79%
Customers on Standard Rates	$304,072	$194,577	64%
Ratio of customers on Discounted Rates / Standard Rates	0.90	1.11	

From the results one can see that the participants were billed only 90 percent of the revenue that non-participants were billed. However, the utility collected almost 80 percent of the revenue billed to participants. By contrast, it collected only about two-thirds of the revenue billed to non-participants. The participants' higher payment ratio more than overcame the revenue impact of their lower billings.

A recent evaluation of the Xcel Pilot Energy Assistance Program in Colorado (PEAP) found that program participants paid two-thirds of their current bills, whereas PEAP-eligible non-participants paid slightly over half of their billing. According to the evaluation, rather than collecting only $533,684 from customers without the PEAP rates, Xcel Energy collected $701,278 from customers enrolled in PEAP. That is, their bills were reduced below the otherwise applicable residential rate, but the revenue they provided was more than $167,000 above what these customers would have paid without the PEAP assistance. (Colton 2010, p 89).

A 2006 evaluation of a New Jersey program found that customers were able to pay a higher portion of their bills when the bills were kept at or below an affordable burden:

> [M]ore than 80% of households with a [net energy burden] below 3 percent covered 100 percent or more of their annual bill. Less than 60 percent of households with a [net energy burden] at or above 8 percent covered 100 percent of their annual bill. (Colton 2010, p. 51).

Put another way, more than 25 percent of participants with energy burdens greater than eight percent of their income paid between 50 and 90 percent of their bill. In contrast, only six percent of participants with energy burdens between two and three percent of their income paid similar portions of their bills. (Colton 2010, p. 51).

In Pennsylvania, the commission determined that the Equitable Gas affordability program cost was substantially less than the uncollectible expense associated with program participants. Customers eligible to participate in the Equitable Gas program who had payment arrangements either negotiated by the Commission's Bureau of Consumer Services or by the Company paid on average "little more than 50 percent of the presubscribed amount." The commission concluded that the evaluation suggested that "the $1.8 million future test year [program] expenses should result in an overall reduction to the Company's cost of service, through its uncollectible expense and savings in credit and collection expenses." (PA PUC v EGC 1990, p. 71).

Pursuing standard collection practices causes the utility to spend money on ultimately fruitless efforts. The relative inefficiency of a traditional collection processes (delivering unaffordable bills, sending late and disconnect notices, and disconnecting customers unable to pay in full and on time) is manifest in the level of activity that it takes to achieve a reduction both in dollars of arrears and in the number of accounts in arrears.

A study of utility affordability in Manitoba investigated some of the tasks involved in pursuing payment the traditional way. Looking at the patterns of payment between 30-day arrears and 60-day arrears, the study observed that Manitoba Hydro without an affordability approach has to handle between five and ten collection calls for every $1,000 reduction in arrears. To prevent 30-day arrears from becoming 60-day arrears, the Company must handle between 1.3 and 2.1 collection calls for every such account. (Colton 2010, p. 21).

A number of regulatory commissions have found that affordability programs brought to them for approval were cost-effective, including Colorado, Pennsylvania, Ohio, Maryland and Missouri. (CO PUC 2000, pp. 13-21; PA PUC 1992, p. 2; OH PUC 1983; MD PSC 2003, pp. 17-18; WGLC 2005, p. 2; MI PSC v UEC 2002).

In Maryland over the 2004-2005 heating season, the arrearages of customers who were not participants but whose income was low enough to qualify for a utility affordability program increased at a rate that was three times higher than the rate of increase for arrearages for program participants. The utility, Washington Gas Light, said that the trends viewed over time were encouraging: "...even over the short period of time that the … Pilot Program has been in effect, there appear to be positive trends" among eligible customers with respect to Pilot Program participation levels and the levels of average account arrearages." Similarly, the Maryland commission staff observed:

> ... the total number of [Pilot] customers in arrearage deceased significantly. There is a correlation between an increase in customer arrearage and an increase in commodity gas prices. The decrease in number of [Pilot] program participants in arrearage shows that the program is effective and is actually reaching its goals of keeping low-income customers on service and promoting positive payment patterns, which in turn trickles to other firm customers by lowering collection costs and other costs associated with charge-offs. (PA PUC 1992, p. 2).

Whether an affordability program increases net costs depends on the program, and is an empirical question. A 2007 review of a number of evaluations of low-income affordability programs gathered data on the credit and collection savings identified by the evaluations. The savings on credit and collections costs were typically modest, and did not offset the entire amount of foregone billings, but they were not insignificant. (APPRISE 2007, p. 81).

The analysts found that having an equal payment per month for program participants was important in improving participant payment behavior. One program reviewed in the 2007 study showed a statistically significant increase in bill payment regularity – this program was unique in that it put participants on an equal monthly payment plan. Arrearage forgiveness also made significant contributions to affordability, which in turn improved payment patterns as a component of an affordability program. (APPRISE 2007, pp. 90-91).

The authors of the 2007 study highlighted that the evaluations they reviewed could not determine whether the program increased payments and reduced costs more than the amount of revenue not billed because of the affordability benefit. They observed that:

> To measure cost neutrality, a program would have to measure the net cost of services for customers prior to enrollment (cost minus payments) compared to the net costs after program enrollment. Further, the analysis would require an experimental design where customers in similar situations were randomly assigned to test and control groups. Utility cost of service information is generally inadequate to measure true service delivery costs. Additionally, programs that we have researched have not employed an experimental design. Therefore, we have not found any evidence to either support of refute the hypothesis that programs can be cost neutral. (APPRISE 2007, p. 94).

Reducing Disconnections

Utility affordability programs have the benefit of enabling customers to maintain service and avert disconnection. For example, Indiana utilities studied the impact of a low-income affordability program on the disconnection of service by comparing participant's disconnections to non-participant disconnections. The utilities also compared the rate of disconnections for participants to the rate of disconnections for the entire residential class. In both cases, the utilities' affordability program was more effective in achieving uninterrupted service than the traditional collections approach. (Colton 2009, pp. 87-88).

The affordability approach reduced the rate of disconnections of program participants to close to the rate for all residential consumers. The evaluation further found that the rate of disconnections of program participants in arrears was lower than the rate of disconnection of the entire residential class.

The evaluation also compared the rate of disconnection for program participants to the rate of disconnection of low-income customers not receiving payment assistance. Not surprisingly, customers paying more affordable rates experienced a decrease in disconnections, while low-income customers not receiving bill assistance continued to see an increase in the number of disconnections. (Colton 2009, p. 88).

Non-Utility Benefits

Reducing disconnections has many benefits for society. Stinting on other necessities to keep utilities on, low-income households may reduce the household food consumption to levels not healthy for their children. This in turn has led to higher rates of childhood malnutrition (Frank 1996; Bhattacharya 2003). Loss of utility service is also a frequent cause of a low-income family having to move, or even to become homeless. For example, in surveys of individuals living in Philadelphia emergency shelters, eight percent of respondents cited disconnection of utilities as the reason for their homelessness. Similarly, a study of homelessness in Northern Kentucky showed that utility shutoffs were among the primary causes of homelessness in that region (Woods 1990, p. 2).

Further information about the effects of fuel poverty is gathered periodically by the National Energy Directors Association (NEADA), an association of national Low-Income Home Energy Assistance Program delivery organizations in the United States. NEADA conducts surveys of LIHEAP recipients to document the experiences of the families and how they are coping with high energy prices and whether or not higher funding levels are helping to reduce arrearages and shut-offs for those families receiving assistance. The 2011 National Energy Assistance Survey documented impacts of the unaffordability of energy bills, the need for LIHEAP, and the choices that low-income households have to make when faced with unaffordable energy bills. According to the survey, nearly 90 percent of LIHEAP recipient households have at least one vulnerable member—defined as someone age 60 or older, age 18 or younger, or disabled. The survey paints a picture of households at risk:

- 40 percent have someone age 60 or older,
- 72 percent have a family member with a serious medical condition,
- 26 percent use medical equipment that requires electricity,
- 37 percent went without medical or dental care,
- 34 percent did not fill a prescription or took less than their full dose of prescribed medication,
- 19 percent became sick because the home was too cold,
- 85 percent of people with a medical condition are seniors (Choate 2011).

Unaffordable electricity and resulting loss of service have also caused dangerous conditions in low-income households and neighborhoods. In October 2013, for example, three children died in a fire started by the candle the household was using for light after the utility disconnected service for non-payment. The building suffered heavy smoke and fire damage and some other occupants had to leave their apartments. The parents were in the process of making payments towards the bill, but the utility had followed its regulator-approved protocol of notice and disconnection. (Sanders 2013; Ahrens 2001, p. 55). Similarly, where gas for heating is shut off, residents often resort to heating with electric ovens or substandard electric space heaters, each a safety hazard. In the United States, 120,000 fires are caused annually by supplemental heaters. These fires kill 600 people every year, and represent 22 percent of all residential fires. (US CPSC).

Affordable Bills Bring Benefits

Any mechanism that enables low-income customers to avert disconnection by lowering the customer's bill will tend to produce the expense savings and non-energy benefits described above. Thus, the energy efficiency portion of LEAP already helps make electricity more affordable for some customers, and produces associated benefits. In most situations, however, conservation alone will not reduce usage far enough to produce an affordable bill. The key is making sure the bill is low enough for the customer to be able to pay it.

The more a program can make bills affordable, the greater the customer, utility, and societal benefits. As discussed below, burden-based affordability programs do the best job of matching bill with affordability. This is particularly the case if they are linked to the household's situation: level of poverty based on income, numbers in the household, and perhaps other variables (rural/urban for example). At the same time, however, the better a program tailors the bill reduction to the actual burden on each household, the more administrative resources will be required to calculate this burden and translate it to a bill reduction. These costs will undermine at least some of the expense savings achieved through affordability. Policy makers have to determine the balance between targeted assistance and other *desiderata.* This issue is further discussed below in the context of program design and administration.

3.3. Program Design

Long-term low-income utility affordability programs can be categorized into a few standard designs: flat dollar per month bill reduction, percentage reduction in bill, and burden-based billing.[6] The advantages and disadvantages of each of these types of programs, as well as others, are discussed in detail below.

Annual Cash Equivalent Payment

Some programs provide an annual supplement to offset energy costs, in addition to benefits already provided by other government programs.

In a small number of the United States, moneys collected from ratepayers by statute are turned over to a government agency, and bundled with an annual benefit that is paid to the participant's energy supplier to help pay for annual energy costs. Usually utility moneys are added to the federally-funded LIHEAP. The funds are administered by the agency that administers the LIHEAP program. In effect they are mingled with the federal and state LIHEAP grants, and are a further source of funding for that program. LIHEAP is distributed to program participants once a year in a lump sum.[7]

The United Kingdom and most Australian concessions and allowances work in a similar way, but are not supplemented by ratepayer moneys.

Once a year benefit programs, however, lack a number of important characteristics. They ignore the reality that for most low-income customers it can be virtually impossible to save money; this leaves little opportunity for the customer to evenly distribute a lump sum benefit over the course of the year. Often the customer accrues arrearages waiting for such a lump sum benefit. Also, a lump sum payment does not provide equal monthly billing or opportunities to earn arrearage forgiveness for regular payment of current bills. These features have been shown to be important for improving affordability.

[6] Burden-based rates are tied to the impact of the rates on the household, rather than to the allocated costs of the utility. The burden is usually defined as the percent of income the household must use to pay for electric or gas utility bills. Programs reduce the bill to a level deemed affordable, by crediting or discounting the bill.

[7] LIHEAP is not an entitlement – households are not guaranteed a LIHEAP benefit if they meet the criteria for receiving such a benefit. There are statutory requirements that target available aid to certain vulnerable households, but once funding for a year has been exhausted, no further benefits are distributed.

Reduce or Eliminate Monthly Customer Charge

In New York and Victoria State, the bill is made more affordable by reducing or eliminating the flat per-month customer charge.[8] This reduces the overall bill, but has rate design effects as well. The effective per kWh rate paid by customers after the application of a customer charge reduction will vary depending on the consumer's usage level. Lower-usage customers will see a higher percentage reduction of their effective per kWh rate than higher-usage participants if both receive the same flat dollar per month reduction in bills.

Reducing the customer charge is likely to provide more relief to lower income customers, as a large portion of them use less electricity. On the other hand, some low-income families use large amounts of electricity, whether because their families are large; or their housing is old, cheaply built, or inefficient; or they have a medical need for electricity to support equipment, refrigeration, or space conditioning. Reducing the customer charge can provide important affordability assistance to many vulnerable customers, but it produces an inexact match of need and assistance. Utilities can easily apply the benefit to participant's bills, leaving the intake process as the main administrative cost.

Percentage Discount on Rates or Bills

Many utilities apply a common percentage discount to the overall bill (or the distribution part of the bill in some restructured jurisdictions). This form of assistance is relatively easy for a utility to calculate: calculate the bill as usual, then apply the designated percentage reduction, and render the discounted bill. As with reduced customer charges, this approach is fairly easy to administer, all participants enjoy the same percentage discount, and no further data need be collected for monthly billing than the usage of the household.

As can be seen from the example below in Table 2, a flat dollar benefit will reduce the effective unit rate paid by low-use customers more than that of high-use customers. By contrast, a fixed percentage discount off the entire bill will reduce the effective rate paid by higher-usage participants to a greater extent than the rate paid by lower-usage participants.[9]

[8] Residential bills often are made up of a flat monthly charge intended to provide a contribution to the fixed costs of connecting a customer, and a volumetric charge (e.g., per kWh) to recover the balance of allocated costs.

[9] The example is purely hypothetical. The percent reduction was estimated by determining the unit rate that, over 800 kWh, would produce a $10 benefit.

Table 2. Impact on Program Benefit of Different Program Designs (Example)

Customer & Program Details	Flat Monthly Benefit ($10/bill)			Per kWh Benefit ($0.0125/kWh)		
Rate and Bill Overview						
Usage (kWh)	400	800	1500	400	800	1500
Per kWh rate	$0.16	$0.16	$0.16	$0.16	$0.16	$0.16
Monthly customer charge	$5	$5	$5	$5	$5	$5
Pre-Benefit Rates and Bills						
Total bill	$69.00	$133.00	$245.00	$69.00	$133.00	$245.00
Effective rate	$0.173	$0.166	$0.163	$0.173	$0.166	$0.163
Post-Benefit Rates and Bills						
Total bill	$59.00	$123.00	$235.00	$64.00	$123.00	$226.25
Effective rate	$0.148	$0.154	$0.157	$0.160	$0.154	$0.151
Program Benefit						
Total bill	$10.00	$10.00	$10.00	$5.00	$10.00	$18.75
Effective rate	$0.025	$0.012	$0.006	$0.013	$0.012	$0.012

Burden-Based Programs

Better matching of bills with need can be accomplished by adjusting the assistance so that it is based on household size and income. The objective is to bring the electricity cost burden of the household down to what is considered an affordable level.

The same dollar expenditure for a low-income household will consume a greater portion of available income than that same expenditure does for a household with higher income. The lower-income household thus has relatively fewer resources remaining for other necessary expenses after paying the same energy bill as that of a higher-income household. The difficulty of paying the energy bill is heavier for such a household, and this burden limits the household's ability to afford other necessities more than the same bill will burden a higher-income household. Using a percent of income measure recognizes this fact. To put the impact of bills on low-income customers on a comparable plane to the impact of bills on high-income customers, or to a percentage deemed affordable, the burden of the bill is measured, rather than the absolute level of the bill. Thus, a higher-income household must have a higher energy bill to have the same *burden* as a lower-income household.

Three types of burden-based programs have evolved: straight PIPPs, fixed-credit PIPPs, and tiered discounts. In a straight PIPP, the dollar value of an affordable burden is calculated for the customer, and this is the amount the customer pays each month.[10] The maximum percent of income considered affordable is determined as a program design feature, and applied to each household's income to derive the dollar energy bill that is at or below the maximum affordable amount. Thus, a customer with an annual income of $8,000 who is required to pay six percent for home energy (including heating) will be expected to pay no more than $480 per year for energy. The required household payment is determined

[10] Additional characteristics beyond household size and income can be included in the matrix as well.

by applying the burden limit to the income, as follows: $8,000 x 6% = $480. So long as the income level does not change, the burden limit will produce the same bill payment obligation, regardless of usage. The monthly bill will be derived by applying the six percent limit to whatever the bill would have been without the affordability program. The bill will accordingly increase or decrease as usage (and thus the underlying bill amount) adjusts.

Under a fixed credit PIPP approach, the annual income, usage, associated undiscounted bill, and required dollar reduction are determined, as in the case of a straight PIPP. However, rather than limit the monthly bill to the resulting percent of income, the benefit is provided in the form of a fixed dollar amount each month. So long as the customer's usage remains the same (and the underlying rates do not change), the customer will see the same net bill each month.[11] The customer's bill would increase, however, if the household uses more energy over the year than estimated when developing the credit.

Tiered discounts apply the limiting percent of income to groups of low-income customers, rather than specifically to each participant. The impact of the burden in light of the income level of the household is approximated, rather than defined customer by customer. A greater benefit is provided to customers whose income is further below a determined poverty level. Low-income customers are divided into tranches, and the lower the range of income, the higher the discount rate applied. The discount is derived by applying the burden limit to the average bill of the customers in the tranche, and using that discount for all the participants in the tranche. Thus, tiered discounts lower the bill to the desired percent of income only for those whose usage (and thus bill) is the same or lower than the median usage (and bill) of the tranche of customers within which the household is grouped.

Whatever the means by which the bill reduction is achieved, PIPPs require a decision as to the maximum affordable burden a household may be expected to carry. There are a number of ways to determine such a level, and there is no single method that is universally used.

Dr. Colton has recommended using an affordability standard of six percent of income. He derives that standard by combining the widely-held view that a household can afford to spend about 30 percent of income on shelter costs with the observation that about 20 percent of shelter costs are used for energy bills; the affordable residential energy burden is thus 30% * 20% = 6% of income. APPRISE – a non-profit research institute dedicated to collecting and analyzing data and information to assess and improve public programs – has proposed definition of "high energy burden." The APPRISE approach identifies a severe shelter burden as 50 percent of income or more, with energy costs at about 22 percent of shelter

[11] There is little information available on the so-called "rebound" effect postulating that lower bills will spur greater usage. There is some evidence that the relationship may be the other way – lower bills result in lower usage – where bill assistance receipt is tied to participation in an efficiency program. For example, UGI Utilities in Pennsylvania charge its bill assistance customers an equal payment each month, based on a calculation of burden. The usage of customers in this program did not increase as a response to lowered bills. (APPRISE 2012, pp. v, x).

costs. Using this approach, APPRISE estimates the figure of 11 percent of income as an indicator of high energy burden: 50% * 22% = 11% of income. (APPRISE 2007, pp. 15-16).[12]

Another approach is to define the maximum affordable percent of income as equivalent to the actual average burden carried by non-low-income residential customers. Thus, if the median income family spends three percent of its income on electricity, the bills of low-income households should be brought down to the same percentage or less of their household income. The percentages can be calculated separately for households heating with electricity and for those that do not heat with electricity. This approach is considered by some to be more equitable than more tailored reductions, in that "rich and poor" are treated the same. But by the same token, differences within the target group of customers are left out of the design.

Other Considerations

If a utility or regulator must limit the budget[13] for a program, the main choice presented is whether to provide a small amount of assistance to the widest possible number of people, or exclude some from the program so as to be able to give a substantial amount of assistance to a smaller number of people. The latter approach will better enable the program to achieve affordability, at least for the limited number of participants. On the other hand, a smaller dollar bill reduction will still be valuable, and assist many low-income customers in achieving better payment patterns and reducing hardship.

It is also worth noting that arrearage management has become an increasingly valuable component of a long-term affordability program.[14] Under an arrearage management program, a customer who pays the affordable bill going forward earns the forgiveness of some share of past-due balances. Participants who do not continue payment of their affordable bills no longer enjoy the arrearage forgiveness, and are returned to the general population for the traditional billing and collection procedures.

In New Jersey, a program required participants to pay down pre-program arrearages on top of their affordable bill. Participants were required to pay bills higher than the amount deemed to be affordable, and as a result did much worse than those whose bills did not exceed the affordable percentage. (APPRISE 2006, p. 66).

Some consider this opportunity to "earn" forgiveness of past due balances an essential component of a long-term affordability program. However, it is beyond the scope of this report to analyze all the nuances of arrearage management programs.

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[12] The authors suggest that burden limits developed in this way can be refined by varying the formula by level of poverty, and by the presence of vulnerable persons in the household (such as elderly individuals, or children under age 12) (APPRISE 2007, pp. 17-18).

[13] "Budget" is used here to refer to the extent by which billed revenues are reduced below non-discounted bills, without regard to offsetting savings or non-utility benefits.

[14] Without limitation, the following jurisdictions include arrearage forgiveness as part of their affordability program: Ohio, Maine, Massachusetts, New Jersey, and Maryland.

Examples of Program Design

Table 3 below lists a number of affordability programs and characterizes their various means of lowering the bills of participants.

In addition to the programs listed in Table 3, it should also be noted that many affordability programs include, or are companions to, low-income energy efficiency and emergency assistance programs, such as those offered today in Ontario under the LEAP program.

Table 3. Summary of Program Designs

Jurisdiction	Design
Australia: Federal	Once per year grants paid to utility on consumer's behalf
Australia: Victoria	Once per year grants paid to utility on consumer's behalf. Cents per day reduction on service-to-property (customer) charge. Waiver of fee for transferring to new supplier
California	Flat 30-35% discount [CARE and FERA] off inverted block rates. Reduced charges for medically need by adjusting usage amounts.
Colorado	PIPP-adjusted rates [to make bill 3% of income on electric; 3% on gas]. Includes arrearage forgiveness program.
Indiana gas utilities	Tiered rate discount. Value when combined with LIHEAP = discounts of 27%/40%/50% or 35%/ 50%/60%, depending on utility. Percentages in inverse proportion to income tranches. Designed so that resulting bills to low-income approximate affordable home energy burden for households with average incomes and usage levels. Includes arrearage forgiveness program.
Maine	CMP provides fixed credit, based on household income and electricity usage (ME Need Help Paying Bills 2014).
Maryland	Benefit = Annual kWh usage x Average Cost per kWh x Utility Index x poverty level percentage. Usage figure = average usage for that tier. Benefits adjusted annually to maintain budget set by statute (plus any additional funds received, e.g., from RGGI). Percent of bill discounted based on household bill (up to a limit), and level of poverty. In 2012, averaged 35% for those at 0-75% FPL, 30% if 75% -110% FPL, 25% if 110% -150, 17% if 150% -175% FPL, and 14% for families living in Subsidized Housing. Includes arrearage forgiveness program.
Massachusetts	Fixed percentage discounts based on pre-restructuring discounts- moving towards common %. Now 25-35%. Also offers arrearage forgiveness program.
New Hampshire	Tiered rate discount. Benefits and participation are subject to availability of funds. The discount is from 9% to 77% depending on gross household income, household size and electricity usage (PSNH 2014).
New Jersey	Monthly augmentation of LIHEAP, amount determined by annual PIPP calculation. Includes arrearage forgiveness program.
Nevada	Increase to annual LIHEAP grants.
New York	Flat dollar reduction in overall bill.
Pennsylvania	Varies. PPL Electric has 3 methods to calculate most affordable rate – Minimum bill, Percent of Bill Income Tiers, and specially calculated. Customers pay fixed dollar amount per month. CARE usually includes arrearage forgiveness program.
Ohio	Straight % of income PIPP. Includes arrearage forgiveness program.
Oregon	Increase to annual LIHEAP grant.
US Federal (LIHEAP)	Once per year and monthly grant paid to utility on consumer's behalf.
United Kingdom	Once per year and monthly grants paid to utility on consumer's behalf.

3.4. Eligibility Requirements

Defining Low-Income

The key question in determining eligibility is how to define "low-income." The objective of many programs is to help vulnerable customers such as seniors, disabled persons, persons dependent on electricity for health and safety. These programs do not always include poverty or fuel poverty as a condition of eligibility.[15] But if the objective is to make bills affordable, some measure of poverty is required.

Income-eligibility has many parameters, not all of which are included in any given program's eligibility criteria. There is the income of the household, of course; while the bill is in one person's name, it is fair to take into account all the income that can be used to support the household's electricity use. Also, the same income can be livable for a single person but wholly inadequate for a family of five. Electric needs can be different for young healthy adults than it is for elders, infants, or disabled persons who are more dependent on the functions electricity makes possible in the home, such as space conditioning. Having a higher income limit for such vulnerable households can be appropriate, as it recognizes that their needs are greater and that they are not likely able to increase their means.

Low-Income Guidelines in Canada

Canada has no formal definition of low-income, and various measures are used for various purposes. Statistics Canada periodically publishes calculations of three different low-income lines: the Low-Income Cut-Offs (LICOs), the Low-Income Measures (LIMs) and the Market-Basket Measures (MBMs).[16] As Statistics Canada states in the abstract of its most recent report, these measures "are not measures of poverty, but strictly measures of low-income."

The LICOs define the income thresholds below which a family will likely devote a larger share of its income on the necessities of food, shelter, and clothing than the average family. LICOs are derived by estimating the income threshold at which households are expected to spend 20 percent more than the average household on basic necessities of life (food, shelter, and clothing). The 20 percent reference is based on the "rationale that a family spending 20 percentage points more than the average would be in 'straitened circumstances'" (Statistics Canada 2014, note 1). The average-household spending levels are derived from data in the Family Expenditure Survey. LICOs are separately estimated for households of different sizes and located in areas with different living costs.

The LIMs are based on the distribution of household income across the Canadian population as a whole. They are estimated according to international standards. The LIM is set at 50 percent of the median

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[15] Programs in Australian and the United Kingdom are more likely to focus on vulnerability as a key concern (see, e.g., Deloitte and Touche 2013, p. 8).

[16] The most recent Low-Income Line published by Statistics Canada is for 2011-2012 (Statistics Canada 2014).

adjusted household income for families of different sizes. The income data is taken from a household survey.

MBM is based on the cost of a basket of goods and services needed to sustain a modest, basic standard of living, including the costs of food, clothing, footwear, transportation, shelter, and other expenses, for a reference family of two adults aged 25 to 49 with two children (aged 9 and 13). The MBM distinguishes between the costs of the market basket between locations of different densities in the different Provinces. In this way, it provides thresholds for a finer geographic level than the LICO. Low-Income status is determined by comparing a household's income to the market basket cost for households of the same size in the same geographic area. The Canadian low-income lines do not include a separate means test, although the market basket measure is differentiated by homeowner mortgage status.

Low-Income Guidelines in the United States

The Federal Poverty Guidelines, or Federal Poverty Limit (FPL), published annually for the United States by the Department of Health and Human Services, is the standard guidelines for many United States programs, although it is typically adjusted by states. The guidelines state a household income limit for households of different sizes, and provide a cut-off for eligibility for some federally-funded programs. They are often used by state and local governments and utility regulators as the starting point in identifying income eligibility limits for means-tested benefit programs. While they are duly published in the Federal Register, they are not an official United States government definition of low-income. In fact, they are so widely as outdated that few social welfare programs use the income limits as published. Rather, program eligibility based on the FPL is typically set at some multiple of the FPL for any given household size.

For many years, the common upper limit to define a low-income household in the United States was 150 percent of the FPL. More recently, programs have specified higher limits, such as 185 percent (e.g., Vermont) or 200 percent (e.g., New Jersey, California) (VT LIHEAP 2014; NJCR 2014; CA AB 327). Other measures have come into use as well, particularly percentages of an area's median household income. States can make their grants for federally-funded LIHEAP benefits available to households with incomes no greater than 60 percent of the state median income (NA LIHEAP 2014, p. 7). For non-LIHEAP programs, higher percentages of the median income have also been used to define the boundary between low-income and non-low-income households. These higher limits have been adopted with the recognition that the FPL is both outdated and flawed in a number of other ways, most importantly being the failure to adjust the line for costs of living, except to give Hawaii and Alaska separate lines. In effect, the poverty line varies by jurisdiction and by enabling legislation, and there is usually some effort to avoid the shortcomings of the FPL.

Leveraging Other Means-Tested Programs

Where many low-income households are recipients of one or more means-tested benefits, the income test for that program can be used to define the maximum income for participation in a low-income electricity affordability program. In Australia, holders of most federal "concession cards" are deemed eligible for the various utility bill assistance offerings (Harmer 2009, p. 122).

In the United States, it is common to declare recipients of Supplementary Security Income (support for aged, blind, and disabled low-income persons), Transitional Assistance for Needy Families (more popularly known as "welfare"), Supplemental Nutritional Assistance Program (SNAP) benefits (historically called "food stamps"), LIHEAP, and other means-tested programs as "categorically eligible" for other means-tested programs. A low-income program might be open to the categorically eligible, and also admit persons whose income relative to the FPL or the median income for the area are deemed below the defining limit of low-income.[17]

If an affordability program is limited to those whose income has already been verified by another agency, it is economic to piggy-back on that determination. The cost of intake and income verification can be a major component of the costs of administering a utility low-income rate. At the same time, limiting participation to those who meet the eligibility guidelines of other programs will necessarily exclude some households whose income is too low to afford basic electricity, but who do not meet some other eligibility criterion of those other programs. Program designers must choose among a set of options: expand eligibility to capture all who find electricity unaffordable, or keep administrative costs low and rely solely on the income-verification already performed by other agencies.[18]

Other Considerations

Within wider definitions of the eligible low-income population, program designers may wish to focus limited funds to groups deemed particularly at risk or otherwise deserving. To accomplish this, administrators will need an outreach plan, to avoid the situation where the first-come applicants are not in the target population, but exhaust the total benefits available. Groups that an electricity low-income program might wish to target have included households with senior members, households with young children, households with medical needs, and households who might not hear about and apply for the program absent such outreach. Such populations include those with language barriers, those living in remote areas, native populations, and others who are not likely to be first in line to apply.

3.5. Intake Process

Utility and Community-Based Organization Roles

Since utility long-term bill affordability programs usually take the form of a special rate or tariff, utilities often perform outreach and intake functions as part of their operations. It has also become common for additional utility program intake to be contracted to a community-based organization or a government

[17] Most of these federal/state programs are administered at the state level.

[18] To further complicate the choices, some of these means-tested programs have asset tests. One can debate the fairness and usefulness of applying asset tests without coming to a firm conclusion. As with most eligibility criteria, assets tests are both under- and over-inclusive of the population of interest.

agency, or both. Social agencies have direct ties to relevant communities, and sometimes are used by other assistance programs as a point of intake. Similarly, government agencies that enroll households in various forms of assistance programs have experience with the application process, including the documentation needed. Governmental agencies and larger social agencies will tend to have sophisticated systems for keeping track of a household's status.

Some utilities, like Pacific Gas & Electric (PG&E), offer their programs on their webpages, and allow customers to apply on-line. In this way, they not only provide a convenient portal for enrollment in a discounted rate program, but they "brand" the affordability program as their own. In addition, they both control information about the program and put the authenticity of the utility behind the program. However, lack of internet access and other barriers to completing on-line forms can limit participation and make program application difficult for some customers.

For these reasons, PG&E contracts with community-based organizations to assist in outreach to customers who may not hear of the offering in the utility's direct mail, on-line, and through mass-media. There is likely a high correlation between populations that are out of the mainstream of information and referral, and populations who are at risk of being unable to afford utility services. There are also some populations of people who do not "trust" utilities (or government agencies), but who will listen to a local member explain the options and assist with an application. Further, such organizations can make internet access available to assist in the on-line application process. For example, the Creek Indians of Oklahoma run 20 community centers throughout their territory. They make computer access available through these centers, and help members make application for a variety of programs.

Questions frequently arise about how to protect the privacy of utility customers and of customers receiving some form of assistance based on their income. Customers can be asked at the time of application for the assistance if they would permit the agency to conduct such a match. This can be done through a box on the application indicating the desire to enroll in the utility program.

In the United States, a common arrangement is the promotion of an affordability program together with LIHEAP, and any other emergency/hardship assistance and energy efficiency services that are available in the jurisdiction. Even if there is not a unitary application, LIHEAP agencies will often include a checkbox on the LIHEAP application for a customer to indicate the desire for the LIHEAP application to serve as an application for participation in the low-income utility affordability program. The LIHEAP application may also provide an opportunity for the consumer to expressly waive privacy rights, so that documentation of income and of participation in other means-tested programs can be obtained by the utility or by the program administrator.

Automatic and Self Enrollment

Another intake feature intended to enable the widest number of eligible customers to participate is the automatic enrolment of customers who do participate in another means-tested program. Consolidated Edison of New York provides an example of this. Twice a year, Consolidated Edison shares the names and addresses of its non-participating residential customers with the New York City Department of Human Services, which administers most means-tested programs offered in the city. The Department of

Human Services matches the names with its lists of participants of the allowed categorical eligibility programs and identifies those customers who appear on both lists. At this point, the Department of Human Services sends a letter to the customers advising them of their eligibility to participate in the utility's long-run affordability program. In New York, the letter provides an opportunity to opt out; if the customer does not object within 30 days, the utility automatically enrolls the household in the utility affordability program.

Automatic enrollment allows a utility to provide its long-term low-income assistance to a wide number of presumably-needy customers, at a very small administrative cost. The matching and letter-issuing process in New York costs between $50,000 and $100,000 (USD), and reaches several hundred thousand New Yorkers.

A few programs, such as the California CARES discount, allow self-certification. Some allow conditional approval based on self-certification with a requirement for later documentation. Here again, if a customer participates in another means-tested program that is accepted as proving categorical eligibility, the certification process is made considerably easier.

Recertification Processes

The question of documentation requires program designers to make a trade-off between the perception of reduced fraud on behalf of customers and the encouragement of eligible households to participate. While there is little evidence of customers filing fraudulent applications, the general public may be reassured if the documentation requirements are high. But by the same token, many otherwise eligible households will be barred from participation because they cannot provide all the information and documentation required.

The desire to reassure the public that customers do not receive aid without meeting the eligibility requirements has led some programs to require annual recertification. Many evaluations of utility affordability programs, however, have shown that large numbers of eligible customers are dropped from the program at recertification time. Customers are not aware of the need to recertify or may have difficulty re-amassing the required documentation, which discourages application for continued participation.

In light of these facts, programs are moving to an 18 month cycle, or longer, rather than a 12 month recertification obligation. In addition, to the extent the customers are recipients of means-tested programs in which they are likely to continue to participate, the recertification obligation can be eliminated. This provision would apply, for example, to those receiving benefits from other programs open only to those whose need is unlikely to be reduced, such as the aged customer or one who is permanently blind or disabled. This allowance may be extended to other customers, to the extent it does not raise undue questions regarding fiscal integrity.

3.6. Delivery Mechanics/Administrator

Long-term low-income affordability programs have a number of administrative requirements. These include without limitation: determining the need for assistance in the utilities' service areas, outreach and marketing the program, taking applications, identifying the eligible customers, verifying their eligibility, determining the amount of assistance they will receive under the program, managing the flow of funds used for bill assistance, paying assistance grants to utilities on behalf of customers,[19] reporting on and evaluating program success, and proposing budgets. Often these administrative functions are parceled out to a number of governmental and private entities, but there is necessarily a role for the utility.

At the very least, the utility must adjust the customers' bills to reflect the amount of reduction afforded by the program. The type of benefit makes it easier or harder for a utility to reflect these program benefits in the bill. The once a year lump sum added to an energy-assistance benefit such as LIHEAP is the least burdensome process for a utility. Further, a uniform benefit for all households would be the least burdensome determinant of a benefit level. And the utility can piggy-back directly on LIHEAP-type government programs to deliver a ratepayer-funded affordability benefit.

As discussed above, however, the annual lump sum approach has the drawback that it does not address the customer's month-to-month need to pay the utility bill. Low-income households by definition do not have enough to meet basic necessities. They typically have difficulty saving money received in a lump sum and spreading it over the course of the year. The lump sum approach does not obviate the need to negotiate a manageable and affordable payment plan, such as one based on the burden left on the household. To this extent, using a lump sum approach excludes some of the tools that are best able to allow customers to pay their reduced bills on time and in full. It eliminates the portions of an affordability program that create a new, more positive ongoing relationship with the utility. An arrearage management program and budget billing are necessary tools to be used along with a lump sum benefit approach.

3.7. Program Funding

As noted above, program budgets are primarily defined as the extent to which the utility reduces it billings to program participants. This bill reduction is by far the largest "cost" of any affordability program. Program budgets typically do not reflect any estimated offsets, such as reduced credit and collection costs.

[19] Affordability programs do not typically provide cash to participating customers, but rather arrange for the benefit to be used to reduce the participant's energy bill. If provided by the utility with ratepayer funds, it is accomplished by the utility rendering a lower bill. If provided as a grant from other sources, it is paid to the utility on behalf of the customer.

There are two fundamental issues policy makers must decide when considering program funding. The first is whether to allow the budget to vary depending on enrollment (at least in any given period), or to make design decisions against a fixed budget constraint.[20]

The second issue is to determine what form of rates will be used by the utility to recover its out of pocket costs for the program. For these purposes, we assume that the bulk of funding will come from other ratepayers. Within this issue are the questions of the rate classes that will be asked to contribute to the program cost, and the design of the rates (usage-based, per-customer, or other).

Fixed versus Flexible Budget

The fixed versus flexible budget decision has certain consequences. If policy makers wish to assure other ratepayers that their contribution will be limited and defined, than a fixed budget is preferable. The New Jersey legislature specifies a dollar amount to be recovered from ratepayers, as well as the amount to be recovered from residential and non-residential customers. The Nevada statute accomplishes a similar result by specifying the surcharge rate to be applied to customers' bills. Where funding levels are set by the statute, it is more difficult to adjust the funding levels.

The corollary of a fixed budget is the need to restrain participation or benefit levels to stay within the budget. Some otherwise eligible low-income customers are bound to be unable to participate in this case, or will have their discount reduced with corresponding impacts on bill affordability. It will be necessary for program administrators to be vigilant about enrollment levels if the goal is to avoid reducing benefits per participant. If stakeholders also wish to target specific groups (e.g., the lowest income, those with the highest burdens, those with seniors in the household, etc.), than both funding projections and efforts to attract those groups must be closely watched.

If policy makers are prepared to allow the budget to vary with the levels of participation (including distribution among tranches of poverty or other determinants of actual benefit levels), it will be easier to manage funding levels. There will be no need to restrict enrollment to first come-first served, or to manage outreach intensively. Maryland,[21] California, and Massachusetts are among the states that cover the gross lost revenue in this way. The corollary is that the sum of bill reductions in any given year will vary by participation levels, as will needed support from other customers to address the program's unbilled revenues.[22]

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[20] For example, benefits from the Maine Energy Assistance Program discounts are subject to availability of funds (PSNH 2014). Nevada limits the surcharge for funding the program, which has the effect of limiting program funding (NRS Chapter 702, §160(1)).

[21] Maryland's universal service funds and programs are supervised by the Office of Home Energy Programs. The Maryland commission reviews the application of funds, determines benefit levels, and makes a report to the legislature. In recent years, Maryland has faced the problem that expenditures have not kept pace with funding, most likely indicating insufficient program outreach, intake and recertification.

[22] The United Kingdom and Australian benefits are typically funded with tax dollars (out of general revenues) and thus are funded by taxpayers in proportion to their obligations.

Note, however, that even where an affordability program has no maximum participation level and associated budget, prudent management is still need to oversee expenditures. Pennsylvania does this by requiring utilities to file a needs assessment every three years, and a plan for meeting the identified needs. The plan can be reopened during its term, if circumstances require. But if the budget is over- or underspent, program managers and regulators can adjust any of the program factors to bring the expected funding more in line with program costs. California similarly requires a triennial needs assessment.

One way to simplify the management of budget levels is to provide a fixed benefit to all participants, leaving only participant level to be estimated. Such programs should be based on a needs assessment, and it should be possible to estimate the number of participants, at least after a period of years. Further, if the data is available on the distribution of income and other eligibility determinants among the low-income population, it is possible to provide a tiered credit while still managing the budget closely. The budget may be open-ended at any given time but can be adjusted if needs be.

Designing Rates to Collect Program Funding

As for collecting the necessary funds, the costs of utility administration could be melded into base rates, or can be recovered by some form of rider with particular rate designs. If the utility is to recover the costs in base rates, the costs (and any associated operational savings) will be reviewed in its base rate case proceedings. However, most utility programs are funded with a dedicated fee collected through a rider on utility rates. These riders are typically subject to an annual true-up, which enables the utility to collect an amount that matches precisely its actual loss in revenue over time.[23]

Historically the level of fees to cover unbilled revenues from universal service programs has been modest (less than a half-dollar per month per customer). With increasing pressure on rate levels in recent years, more attention has been paid to the size of universal service funding. Also, some jurisdictions in the United States have “raided” universal service funds (e.g., Texas, Connecticut) and diverted them to other general budget purposes. A dedicated fee allows it to be isolated from utility’s total costs, and exposes the fund to demands for “re-purposing.”

In most jurisdictions with programs funded by ratepayers, the costs are allocated to all classes, including commercial and industrial classes. Ohio has a hybrid approach: costs are recovered from all customers in a surcharge that is updated annually, except in the case of customers with usage over 700 MWh per month (very large industrial customers). For these customers, the surcharge for usage over 700 MWh is fixed at the lower rate that was in effect before changes were made to the program in 1999.

[23] Just as budgets are typically based on the reductions in billings, it is unusual for a regulator to attempt to capture the offsetting considerations when setting the fees to fund the program. In part this is because it is difficult to do so, given data limitations. As for credit and collection costs, they are typically reflected in base rates without isolation and review.

Funding For Administration

In some cases, program designs build in a limit on expenditures for program administration. The LIHEAP program limits grantees administrative costs to ten percent of funding. In Maryland, statute limits the administrative funding for the state agency that administers the program to 12 percent. Interestingly, this is the same state agency that administers the LIHEAP program; by federal law, the agency can only use ten percent of LIHEAP funds for administration.

In Nevada, the statute's terms are quite prescriptive. The Nevada statute limits administration costs of the regulator to three percent of program funds, and of the state LIHEAP agency to five percent of the 75 percent of total funds assigned (NRS Chapter 702, §170(4), 260(1)). The LIHEAP agency is thus limited to 3.75 percent of total funds (5% * 75% = 3.75%). Therefore, the total administrative draw on the fund is limited to 6.75 percent of total funds (3% + 3.75% = 6.75%). The addition of utility affordability funds to the already-administered LIHEAP-type benefit can reduce utility administrative costs.

Administrative costs for energy efficiency programs have been challenged on some occasions. Administrative costs for low-income bill affordability programs have not drawn great notice. One reason may be that it is difficult to assign costs to administration as opposed to other functions, making determination of over- or under-spending difficult.

4. Policy Options and Considerations

Our review has identified a number of areas where there is tension between tools to achieve program objectives. They generally lie along the line between simple and poorly targeted, and costly but well-targeted. Of course, there are myriad sets of decisions to be made. The policy makers can construct a program with a mix of techniques in an effort to achieve the desired balance between maximizing affordability and minimizing gross revenue losses and administrative expenditures.

Table C in Appendix C shows a number of long-term affordability programs, and the set of tools selected by the program designers. As can be seen, the range of options is wide. Even within burden-based programs, for example, there are several ways to determine and apply the bill assistance.

A program that usefully balances competing program goals for Ontario might contain the following features:

a) Eligibility based on participation in another means-tested low-income program as well as by proof of low-income and utility burden;

b) Outreach and intake by the utility on its webpages, and by contract with agencies that have offices in the communities staffed for similar functions.

c) Benefit in the form of a monthly fixed credit.

d) Amount of benefit pegged to average utility burden for the median income household in the community.

e) Equal monthly billing for participants.

f) Consideration of arrearage-forgiveness component.

g) No recertification required where eligibility is likely to persist; two to four year recertification in cases where circumstances are subject to change; outreach to customers regarding recertification to improve compliance.

h) Evaluation of program success in (1) reducing disconnections, (2) improving payment patterns, and (3) reaching intended beneficiaries.

i) Periodic review of program to consider expansion of eligibility, feasibility of improving affordability and targeting features of program, and opportunities to streamline administration without undermining program effectiveness.

These features represent an effort to achieve widespread eligibility at reasonable costs, with little administrative complexity, and with maximum likelihood of improving affordability and payment patterns. Piggy-backing on existing means-testing, especially where intake offices are widely dispersed in the Province, will keep administrative costs low while reaching a large portion of those facing affordability problems. Using a fixed dollar credit, and tying it to the burden borne by the customer of median household income, simplifies determination and application of the credit. Providing an equal payment plan allows a low-income customer to manage limited resources through the year and improve payment patterns.

Each of the above features is discussed in more detail below.

a) **Eligibility based on participation in another means-tested low-income program as well as by proof of low-income and utility burden.**
It greatly reduces administrative costs if a bill assistance program piggy-backs on the evaluation of income and eligibility being done already for other means-tested programs. Exclusive reliance on this method will likely exclude many households whose needs are just as great as those of households who are "categorically eligible." The categorical eligibility needs to be supplemented by a program-specific means test for those households who would not otherwise qualify and receive assistance.

b) **Outreach and intake by the utility on its webpages, and by contract with agencies that have offices in the communities staffed for similar functions.**
It is valuable for the utility to "own" the program. Such an approach allows the utility to brand the program through its existing advertising channels, make the program's existence known to its customers periodically, and perform intake (at least to the point of making specific referrals to community-based organizations doing intake on a contract basis, or government agencies that qualify categorically-eligible customers).

c) **Benefit in the form of a monthly fixed credit.**
While there is almost no evidence that a bill varying by usage induces higher usage, it is useful to avoid that issue by providing the benefit as a fixed credit. This places the entire

burden of higher bills resulting from higher usage on the household. There should be exceptions allowed if the household's circumstances change such that its usage is impacted by the change.

d) **Amount of benefit pegged to average utility burden for the median income household in the community.**
There are no universal definitions of the affordable energy burden. Most programs are about six percent of income, with ranges from three to ten percent or more of income in the case of electrically heated homes. Pegging the burden to that of the median income household has an inherent "fairness" appeal.

e) **Equal monthly billing for participants.**
In addition to a fixed credit, customers should be provided budget billing. Some budget billing programs true-up a customer's annual bill, up or down, at the end of a year. Having a predictable and fixed bill to pay greatly enables planning and improves bill payment behavior.

f) **Consideration of arrearage-forgiveness component.**
Arrearage forgiveness programs have been highly effective in motivating positive bill payment behavior, and lowering disconnections for low-income customers.

g) **No recertification required where eligibility is likely to persist; two to four year recertification in cases where circumstances are subject to change; outreach to customers regarding recertification to improve compliance.**
The desire to avoid fraudulent benefit claims by the customer has led to cumbersome recertification requirements, which tend to push customers out of the program at the time of recertification. No fraud has ever been established in these programs. In the case of customers whose income is not likely to increase significantly year over year (such as pensioners and the disabled, or families with very young children dependent on income support), certification should only be done after two or four years from entry into the program.

h) **Evaluation of program success in (1) reducing disconnections, (2) improving payment patterns, and (3) reaching intended beneficiaries.**
These are the kinds of improvements that a utility should expect to enjoy with a successful bill assistance program. Evaluations could also be more detailed or target other indicators of success.

i) **Periodic review of program to consider expansion of eligibility, feasibility of improving affordability and targeting features of program, and opportunities to streamline administration without undermining program effectiveness.**
Any program should be revisited periodically to see if it is achieving its goals, and doing so in the most cost-effective manner.

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APPENDIX A: RESEARCH DETAIL BY JURISDICTION

Introduction

Appendix A provides the detailed results of the research conducted for a number of jurisdictions. It provides the complete information for each state to support the policy analysis and considerations contained within this report.

Australia, Federal

	Program Type	Rate Assistance	Emergency Assistance	Other (1)	Other (2)
	Program Name	Energy concessions	Hardship assistance	Australia Utility Allowance	Household Assistance Package
Overview	Reason/Mechanism for Establishing Program	Currently, energy concessions and hardship payments for vulnerable customers are provided by State and Territory Governments under the Australian Energy Market Agreement (2006), which opened retail electricity to competition.	Energy concessions and hardship payments for vulnerable customers are provided by State and Territory Governments under the Australian Energy Market Agreement (2006), which opened retail electricity to competition.	Supplement basic assistance grants to those receiving disability support pension, partner allowance or widow allowance.	Government created a $15(AU) billion package when carbon tax enacted, to cushion price increase impacts. With the repeal of the carbon tax effective July 1, 2014, the Australian government revised the Clean Energy Supplement, which had been paid automatically to pensioners, families who receive family assistance, and others on government income support. The Clean Energy Supplement was a "sweetener" added to household assistance when the carbon tax was enacted. Originally proposed to be eliminated when the carbon tax was repealed, it was retained, and renamed the "Energy Supplement." In addition, the rate of payment as of 30 June 2014 was fixed for future payments, rather than increasing in future as had been the case with the Clean Energy Supplement.
Design & Admin.	Utility and/or Program Administrator	In Australia, energy concessions (payments targeted at vulnerable customers to assist them to pay their energy bills) are predominately provided by state and territory governments and administered by energy retailers as an automatic deduction from energy bills.	The Australian Capitol Territory (ACT), Tasmania and the Northern Territory Governments do not offer direct emergency hardship payments, although retailers in these states do operate hardship programs which involve bill smoothing and payment plans. The ACT has a hardship program operated by the ACT Civil and Administrative Tribunal, and provides an external avenue through which customers experiencing hardship may apply to be put onto a retailer's payment plan or into a hardship program. The Tribunal has the power to direct a retailer to discharge part or all of an outstanding energy bill, including any interest or fees incurred, in exceptional hardship circumstances.	In addition to state concessions, the Australian Government provides an energy concession – known as a Utilities Allowance – for those receiving the disability support pension, partner allowance or widow allowance.	Usually automatic.
	Intake Process	Apply at Department of Work and Assistance.	Not available at this time.	Usually automatic.	Not available at this time.
	Program Design	Energy concessions (payments targeted at vulnerable customers to assist them to pay their energy bills) are predominately provided by state and territory governments and administered by energy retailers as an automatic deduction from energy bills.	In contrast to regular energy concessions, hardship assistance payments (emergency payments to customers already in financial stress) are provided on a temporary basis.	Flat monthly grant.	Flat monthly grant.
	Delivery Mechanics	Not available at this time.	Administration of hardship payments varies by jurisdiction. Hardship assistance is either directly provided by state governments or distributed in partnership with electricity retailers and charitable organizations such as St Vincent de Paul and the Salvation Army. The ACT has a hardship program operated by the ACT Civil and Administrative Tribunal.	Not available at this time.	
	Eligibility Requirements	Not available at this time.	In some states, payment eligibility is assessed by community welfare organizations on the basis of circumstances rather than automatic eligibility as a result of holding a Commonwealth concession card.	Not available at this time.	Given to pensioners, families who receive assistance and those on income support.
Funding	Funding Source	Not available at this time.	Not available at this time.	Not available at this time.	Federal budget.
	How Funding Levels are Established	Not available at this time.	Hardship payments are more variable in nature among the states than regular concessions, with amounts paid on a case-by-case basis, as assessed by the relevant department.	Not available at this time.	Not available at this time.
	Funding Dedicated to Program Admin.	Not available at this time.	Not available at this time.	Not available at this time.	Not available at this time.
	Entity Receiving Admin. Funding and Why	Not available at this time.	Not available at this time.	Not available at this time.	Not available at this time.
Other	Program Results/ Impacts	Analysis by consulting firm hired by Energy Supply Association of Australia concludes that four potentially vulnerable customer groups are at risk of "falling through the cracks": Family Formation Group (e.g. young families with small children), single renters with low income, regional (non-urban) customers with low income not connected to the energy network (mostly delivered gas customers but also some master-metered electricity customers), and new home buyers with low after-housing-cost income).	Analysis by consulting firm hired by Energy Supply Association of Australia concludes that four potentially vulnerable customer groups are at risk of "falling through the cracks": Family Formation Group, single renters with low income, regional (non-urban) customers with low income not connected to the energy network (mostly delivered gas customers but also some master-metered electricity customers), and new home buyers with low after-housing-cost income).	Not available at this time.	With the repeal of the carbon tax effective July 1, 2014, the Australian government revised the Clean Energy Supplement, which had been paid automatically to pensioners, families who receive family assistance, and others on government income support. The Clean Energy Supplement was a "sweetener" added to household assistance when the carbon tax was enacted. Originally proposed to be eliminated when the carbon tax was repealed, it was retained, and renamed the "Energy Supplement." In addition, the rate of payment as of 30 June 2014 was fixed for future payments, rather than increasing in future as had been the case with the Clean Energy Supplement. (Conversation 2014).
	Other	Not available at this time.	Not available at this time.	Not available at this time.	Australian Government has proposed welfare changes to make it harder to receive aide if able to work.

Australia, Victoria

	Program Type	Rate Assistance	Off-peak concession	Other State-specific (1)	Other State-specific (2)
Overview	Program Name	Annual Electricity Concession	Off-peak concession	Service-to-property-charge concession	Electricity Transfer Fee Waiver
	Reason/Mechanism for Establishing Program	The Victorian Hardship Enquiry's Main Report established the following core principles or reasons for supporting vulnerable energy customers: that energy should be provided on 'fair and reasonable' terms, that a legitimate inability to pay should not result in disconnection, and that there is a balance to be struck between consumer welfare and the commercial realities that energy companies face.	Introduced in response to large increases in off-peak prices in the early 2000s.	To assist vulnerable customers with rising energy bills by removing monthly charge for line extension.	To assist vulnerable customers wishing to shop for competitive supplier.
Design & Admin.	Utility and/or Program Administrator	Department of Human Services	Department of Human Services	Department of Human Services	Department of Human Services
	Intake Process	Customers call their electricity retailer and give their concession card details over the phone. The electricity retailer checks the customer's concession card details with Centrelink, and applies the discount to the customer's bill. Centerlink is a service offered by the Australian Government's Department of Human Services, and delivers payments and services for retirees, job seekers, families, parents, people with disabilities, Indigenous Australians, and people from culturally and linguistically diverse backgrounds, and provides services at times of major change. Many of Australia's assistance programs are connected to concession cards, which are identification cards related to health care, seniors, students, veterans, low-income, and other types of situations that cause customers to be on low or fixed incomes.	Not available at this time.	Not available at this time.	Not available at this time.
	Program Design	17.5% discount on electricity bills	13% discount on the off-peak tariff of electricity bills for households with separately metered electric hot water or slab heating. Not available in relation to the flexible or time-of-use tariffs enabled by a smart electricity meter or similar technology.	Provides a reduction on the (fixed cents/day) supply charge for concession households with low electricity consumption. The concession is applied if the cost of electricity used is less than the supply (or service) charge. The service charge is then reduced to the same price as the electricity usage cost.	Provides a full waiver of the fee that is normally payable to electricity retailers when there is a change of occupancy at a property.
	Delivery Mechanics	Utility applies discount/government pays for discounts.	Utility applies discount/government pays for discounts.	Utility applies discount/government pays for discounts.	Utility applies discount/government pays for discounts.
	Eligibility Requirements	Commonwealth Concession card. Many of Australia's assistance programs are connected to concession cards, which are identification cards related to health care, seniors, students, veterans, low-income, and other types of situations that cause customers to be on low or fixed incomes.	Commonwealth concession card.	Commonwealth concession card.	Commonwealth concession card.
Funding	Funding Source	Government	Government	Government	Government
	How Funding Levels are Established	Budget Process	Budget Process	Budget Process	Budget Process
	Funding Dedicated to Program Admin.	Not available at this time.	Not available at this time.	Not available at this time.	Not available at this time.
	Entity Receiving Admin. Funding and Why	Not available at this time.	Not available at this time.	Not available at this time.	Not available at this time.
Other	Program Results/ Impacts	Not available at this time.	Not available at this time.	Not available at this time.	Not available at this time.
	Other	Not available at this time.	Not available at this time.	Operates like the waiver of a customer charge. Greater percent discount thus to lower use customers.	Not available at this time.

California

Overview	Program Type	**Rate Assistance**	**Rate Design (1)**	**Rate Design (2)**
	Program Name	California Alternate Rates for Energy (CARE)	Medical Baseline	Family Energy Rate Assistance program
	Reason/Mechanism for Establishing Program	Commission authorized; statutory requirement and limits; Cal. Pub. Util. Code §382.	To assist customers with medical needs for electricity.	To help large families with utility bills.
Design & Admin.	Utility and/or Program Administrator	Pacific Gas & Electric/Utilities	Pacific Gas & Electric/Utilities	Pacific Gas & Electric/Utilities
	Intake Process	Application forms can be obtained from the utility, or completed online through the utilities' website. Application forms also are available through numerous community agencies. For PG&E's CARE program, no proof of income is necessary for enrollment. Once a customer's application is approved, they see the CARE/FERA Program and monthly savings listed on the first page of their bill. The CARE discount appears on the bill after the completion of a full billing cycle. Customers receive the discount for two years (or four years if they are on a fixed income). Three months before the discount expires, PG&E sends a letter and re-certification application giving customers the opportunity to reapply if they still qualify under the current program guidelines.	Customers may call utility or apply on line.	Customers may call utility or apply on line.
	Program Design	30-35% discount off electric bill, depending on utility.	All residential customers are billed a certain amount of their natural gas and electricity use at their utility company's lowest residential rate. This is called the "Baseline Allowance" and it is set depending on what climate zone the home is in and whether it is the utility's "winter" or "summer" season. Extra allowances of natural gas and electricity are billed at the lowest rate for customers who rely on life support equipment, or those who have life threatening illnesses or compromised immune systems. The extra allowances are called Medical Baseline.	Families whose household income slightly exceeds the low-income energy program allowances will qualify to receive FERA discounts, which bills some of their electricity usage at a lower rate. FERA is available for customers of Southern California Edison, San Diego Gas and Electric Company, and Pacific Gas and Electric Company.
	Delivery Mechanics	Utility renders discounted bill.	Utility renders discounted bill.	Utility renders discounted bill.
	Eligibility Requirements	Customers with incomes under 200% of the Federal Poverty Levels are eligible for CARE. Customers may also qualify they are enrolled in public assistance programs such as Medicaid/Medi-Cal, Women, Infants and Children Program (WIC), Healthy Families A & B, National School Lunch's Free Lunch Program (NSL), Food Stamps/SNAP, Low Income Home Energy Assistance Program (LIHEAP), Head Start Income Eligible (Tribal Only), Supplemental Security Income (SSI), Bureau of Indian Affairs General Assistance, and Temporary Assistance for Needy Families (TANF) or Tribal TANF. CARE is also available to the following PG&E customers: Tenants of Sub-Metered Residential Facilities Qualified Non-Profit Group Living Facilities Agricultural Employee Housing Facilities Migrant Farm Worker Housing Facilities.	Customers with household member needing life-support equipment. "Life support equipment" means equipment that uses mechanical or artificial means to sustain, restore, or supplant a vital function, or mechanical equipment that is relied upon for mobility both within and outside of buildings. This includes: All types of respirators, iron lungs, hemodialysis machines, suction machines, electric nerve stimulators, pressure pads and pumps, aerosol tents, electrostatic and ultrasonic nebulizers, compressors, IPBB machines and motorized wheelchairs. Also, in consideration of their increased heating and cooling needs, the Medical Baseline allowance is available to paraplegics and quadriplegics, multiple sclerosis patients, scleroderma patients, and people being treated for a life threatening illness or who have a compromised immune system.	Families whose household income slightly exceeds the low-income energy program allowances will qualify to receive FERA discounts, which bills some of their electricity usage at a lower rate. FERA is available for customers of Southern California Edison.
Funding	Funding Source	All ratepayers via nonbypassable volumetric charge on distribution services.	Residential cost responsibility is redistributed in rate design process.	All ratepayers - nonbypassble volumetric distribution charge.
	How Funding Levels are Established	Low Income needs assessment as required by Cal. Pub. Util. Code §382(d); participation of customers and effect of applicable discounts.	Function of participation and associated rates.	Function of participation and associated rates.
	Funding Dedicated to Program Admin.	Not available at this time.	Not available at this time.	Not available at this time.
	Entity Receiving Admin. Funding and Why	Not available at this time.	Not available at this time.	Not available at this time.
Other	Program Results/ Impacts	Not available at this time.	Not available at this time.	Not available at this time.
	Other	Not available at this time.	Inverted block rates under consideration by Commission - Assigned Commissioner has proposed moving to TOU rates, which would make baseline rates inapplicable. Consumer groups are fighting the proposed change. Recent statute continues bar on requiring residential TOU rates before 2018.	Not available at this time.

Colorado

	Program Type	Rate Assistance - PIPP	State Energy Assistance
Overview	Program Name	Percentage of Income Payment Plans (PEAP)	Low Income Energy Assistance Program (LEAP)
	Reason/Mechanism for Establishing Program	Established in 2012. Mandated by the CPUC which oversees the utilities and regulates the terms.	To help address declining federal LIHEAP funding.
Design & Admin.	Utility and/or Program Administrator	Xcel Energy (4 other utilities also provide this program)	Colorado Department of Human Services (CDHS)
	Intake Process	The State LEAP office provides utilities with data on LEAP approved households, which is used for direct outreach to these clients. Xcel Energy created a portal to assist counties with eligibility determination by transmitting daily data on customer heating costs to the state's centralized LIHEAP eligibility processing system.	CDHS sends out a mass mailing of applications prior to the start of the season to all previous year clients. New clients hear about the program through 1) mass media (tv and radio advertising, community columns, call-in with major news stations), 2) county local outreach with community agencies (flyers, brochures, events), 3) state website (w/ access to the application), 4) Program Eligibility Application Kit (PEAK) (website where clients can determine if they are eligible for LEAP) and 5) statewide heat help line where clients can call and get information.
	Program Design	Monthly reductions in low-income customers' bills, both current and those in arrears. Also educates customers on ways to manage their monthly bill. Participants pay between 2 and 3 percent of their household income, and have the opportunity to have past-due amounts forgiven. Requires participants to be billed 3 percent of their electric bills and 3 percent of their gas bills, bringing their maximum total payment to six percent of income. Arrearage forgiveness plan forgives existing arrears over a 24-month period.	Pays a portion of a customers bill directly to their utility company.
	Delivery Mechanics	Utilities manage the program.	CDHS manages the program.
	Eligibility Requirements	LEAP approved households.	150% FPG. Eligibility is based on household income and federal poverty guidelines. Those approved for this program may also receive Emergency Assistance.
Funding	Funding Source	Customer surcharges.	LIHEAP funding from the state as well as private funds from oil and gas companies, foundations, and private donations.
	How Funding Levels are Established	Not available at this time.	Not available at this time.
	Funding Dedicated to Program Admin.	Not available at this time.	Not available at this time.
	Entity Receiving Admin. Funding and Why	Each of the five largest utility companies maintains departments dedicated to working with their low-income clients to ensure those households get the heating they need and can manage their bill payments.	Not available at this time.
Other	Program Results/ Impacts	8,500 households assisted.	90,000 households served in the 2013-2014 program year with an average benefit of $438.
	Other	Not available at this time.	Commission on Low Income Energy Assistance coordinates state-funded efforts. The state and EOC maintain an 800 number, run by a contractor, to provide centralized information and referrals to those seeking help with energy costs.

Illinois

Overview	Program Type	**Rate Assistance**
	Program Name	Percentage of Income Payment Plan (PIPP)
	Reason/Mechanism for Establishing Program	First required by the Low Income Home Energy Assistance Act of 1981, and amended by Illinois Energy Assistance Act of 1989. The Illinois Energy Assistance Act (IL EAA) details the requirements for low-income energy assistance programs in the state. The IL EAA requires four programs: (1) the energy assistance program, (2) a state weatherization program, (3) the percentage of income payment plan (PIPP or PIP), and (4) an arrearage reduction program as part of the PIPP. The Department of Commerce and Economic Opportunity (DCEO) (the state department that sponsors statewide economic development) has interpreted the IL EAA such that LIHEAP carries out the energy assistance program requirements of the IL EAA. (305 ILCS 20; IL LIHEAP 2014c).
Design & Admin.	Utility and/or Program Administrator	Utilities serving more than 100,000 customers as of 1/1/2009 are required to offer the program, which includes Ameren Illinois, ComEd, Nicor Gas, and Peoples Gas/North Shore Gas.
	Intake Process	PIPP eligibility is determined by Local Administrative Agencies (LAAs). These are local community action agencies, other community-based organizations or units of local government that implement the LIHEAP at the local level. These agencies are responsible for the provision of outreach, referral, energy-related counseling and educational materials, taking applications, verifying eligibility information and issuing assistance payments to energy vendors. LAAs are required to notify applicants of their eligibility status within 30 days of the date the client application is complete. (DECO 2013, p 4). Applications for PIPPs are handled centrally by the state Department of Commerce and Economic Opportunity's Office of Energy Assistance and not through the individual vendors, but the participating utility companies have helped design the program from its beginning in 2011. The utilities offering PIPPs use a real-time integrated data system in which they enter and track customer information such as Social Security Number and termination status to aid in program administration. (ASPE 2014, p 30).
	Program Design	A bill payment assistance program for low-income customers. Participants pay no more than 6 percent of their income for gas and electric service. The maximum PIPP benefit is $1,800 per year, with a maximum of $100 per month for the participant's natural gas bill and $50 for the electric bill. The PIPP program has an arrearage reduction component, which provides participants with a monthly benefit towards their utility bill and a reduction in overdue payments for every on-time payment they make by the bill due date. Participants who make their monthly PIPP payments on time receive a monthly credit amounting to one twelfth of their past due bills, up to $1,000 total per year for both gas and electric bills. (305 ILCS 20/18, (c)(5);IL LIHEAP 2014c). The PIPP includes client education to inform customers about the PIPP and about their rights and responsibilities under the program. If clients miss their payments, the local agencies attempt to contact them and help them stay on the program. (IL LIHEAP 2014c).
	Delivery Mechanics	The DCEO remits, through the LAAs, to the utility or participating alternative supplier that portion of the plan participant's bill that is not the responsibility of the participant. Essentially, the DCEO collects program funding (as described below), determines the customer's program eligibility, and pays the funding to the utility on behalf of the customer.
	Eligibility Requirements	Up to 150 percent of federal poverty guidelines. The DCEO establishes the specific eligibility levels, and in so doing considers factors such as economic conditions, state and federal funding levels, and energy costs. PIPP eligibility is based on whether the customer is on retail competition, and whether their supply vendor collects the SLEAF charge. If the vendor does not collect the charge, then the customer cannot receive benefits from that funding source. PIPP participants have the option of signing up for PIPP or receiving a one-time direct vendor payment, either through LIHEAP funds or the ratepayer (meters charge) funds. If a customer participates in PIPP, it cannot participate in another energy assistance program for the year. (305 ILCS 20/18, (c)(2)).
Funding	Funding Source	There are two sources of funding for this program. The Supplemental Low-Income Energy Assistance Fund (SLEAF) is funded by voluntary donations from individuals, foundations, corporations, and other sources. The Energy Assistance Charge collects funds from all ratepayers to fund the assistance programs.
	How Funding Levels are Established	Funding levels are based on availability for each funding source. The SLEAF level of funding is based on the donations provided. The Energy Assistance Charge is as follows: residential customers are charged $0.48 a month, small C&I customers are charged $4.80 a month, and large C&I customers are charged $360 a month.
	Funding Dedicated to Program Admin.	The amount of the SLEAF funds spent on administrative expenses in a year must not exceed 10 percent of the amount collected during that year. Illinois utilities were required to pay a one-time payment of $22 million with the passage of the IL EAA. These funds were used for the DCEO's cost of program implementation. It is not clear if administrative requirements are associated with the Energy Assistance Charge.
	Entity Receiving Admin. Funding and Why	Funding is eventually transferred to the Department of Commerce and Economic Opportunity, but may be collected through utilities or through the State Treasury.
Other	Program Results/ Impacts	For FY 2012, the program enrolled over 37,000 households and spent $21.6 million for PIPP benefits and another $37.3 million for direct vendor payments to PIPP households. At the end of FY 2013, at least $35 million had been obligated on behalf of about 52,000 participants. From 2011 to 2012, there was a 6% decrease in residential electric terminations.
	Other	Not available at this time.

New York

Overview	Program Type	**Rate Assistance (1)**	**Rate Assistance (2)**
	Program Name	Low-Income Rate Assistance (in general)	ConEd's Low Income Program
	Reason/Mechanism for Establishing Program	Not available at this time.	Since 1989, the New York PSC has directed the creation and expansion of targeted low-income rate assistance program. The New York legislature has had little involvement.
Design & Admin.	Utility and/or Program Administrator	Administered by the utilities.	Con Edison, with assistance from human services agency eligibility determination or categorically-eligible.
	Outreach and Intake	Varies by utility.	The Company pays the out-of-pocket costs for the city and county [NYC and Westchester] Departments of Human Services to run a computer match twice a year of categorically-eligible households and the utility's residential customers. The utility sends a list of residential customers to the agency, which then conducts the computer match. The agency notifies the utility of the matches, and sends a letter advising the customer that she will be enrolled in the low-income program unless she opts out. The utility must enroll the customer within 30 days of receiving the information that the customer is a match.
	Program Design	Discounts off the basic monthly service charge for electricity and/or gas. Monthly discounts range from $2 to $24 off the monthly fixed customer charge. Some gas companies provide discounts on consumption up to a specified level. For example, Con Edison provides a 50 percent discount on the first 90 therms to 165,000 customers. Some of these programs offer arrearage forgiveness and case management as well. For example, KeySpan's "On-Track" program provides financial assistance, education, and energy and financial management to a limited number of low-income customers. Customers on the payment plan may receive credits on past due accounts.	Flat dollar reduction off monthly bill, plus waiver of reconnection fees.
	Delivery Mechanics	Varies by utility.	Company has billing software to compute effect of discount off participating customers' bills.
	Eligibility Requirements	For most programs, households in receipt of or eligible for LIHEAP are automatically enrolled into the program.	Customers enrolled in the Utility Guarantee or Direct Vendor programs administered by local human resource agencies; receive benefits under Temporary Assistance for Needy Persons/Families, Safety Net Assistance, Supplemental Security Income, or the Supplemental Nutrition Assistance Program; or received a Home Energy Assistance Program [LIHEAP] grant in the last twelve months. In last rate case, low-income advocates urged that Medicaid receipt be added to the list of programs receipt of which make a customer "categorically eligible." The PSC deferred its decision, pending research to estimate how many Medicaid eligible customers are served by Con Edison that are not already participants in the electric low-income program. On August 21, Con Edison provided those numbers, along with its analysis of how its low-income program budget could adapt to any anticipated changes in volume.
Funding	Funding Source	Funded through utility rates recovered from all customer classes.	Funded through utility rates recovered from all customer classes.
	How Funding Levels are Established	Rate cases and settlements.	In most recent rate case, 13-E-0030, order issued 2-14-14, all but low-income intervenors agreed to settlement that would set the budget at $[US] 47.5 million, assuming a $9.50 per month per participant bill reduction (up from $8.50), and the program having on average, approximately 417,000 customers. Con Edison reported in August that adding Medicaid as qualifying means-tested program for categorical eligibility would add 129,000 more customers to program. Assuming same $9.50 credit for all participants, the budget would have to increase by about $15 million, to $65.2 million for rate credits. The Commission has not ruled on the issue.
	Funding Dedicated to Program Admin.	Varies by utility.	See How Funding Levels are Established.
	Entity Receiving Admin. Funding and Why	Utilities plus any contract assistance (e.g. intake).	Con Ed staffing is part of O&M in base rates. Small payment for matching and opt-out letters is made to agencies.
Other	Program Results/ Impacts	As of mid-2013, the state's major electric and gas companies were providing about $112 million annually for low-income rate assistance programs that assisted over one million households.	In most recent year, 417,000 customers were enrolled.
	Other	Not available at this time.	Not available at this time.

Pennsylvania

	Program Type	Discount, DSM, credit and collection rules	Emergency Assistance
	Program Name	Customer Assistance Programs (CAPs) Discount	Customer Assistance and Referral Evaluation Services (CARES)
Overview	Reason/Mechanism for Establishing Program	Pennsylvania statute requires protections, policies, and services that assist low-income customers to maintain electric service known as Universal Services and Energy Conservation. This term also includes customer assistance programs, termination of service protection and policies and services that help low-income customers to reduce or manage energy consumption in a cost-effective manner, such as the low-income usage reduction programs, application of renewable resources and consumer education. (PA Title 66, Chapter 28, §§2802(10), 2803). To fulfill the Universal Services and Energy Conservation requirements, the Pennsylvania Public Utility Commission (PA PUC) established standard reporting requirements for the utilities in the state (PA Title 52, Chapter 54, §§ 54.71-54.78). Historically, utilities offered various forms of assistance programs. As part of the transition to deregulated supply markets, universal service programs were defined as part of the statute and made mandatory for larger utilities, although utilities still offer various types of assistance programs.	Pennsylvania statute requires protections, policies, and services that assist low-income customers to maintain electric service known as Universal Services and Energy Conservation. This term also includes customer assistance programs, termination of service protection and policies and services that help low-income customers to reduce or manage energy consumption in a cost-effective manner, such as the low-income usage reduction programs, application of renewable resources and consumer education. (PA Title 66, Chapter 28, §§2802(10), 2803). To fulfill the Universal Services and Energy Conservation requirements, the Pennsylvania Public Utility Commission (PA PUC) established standard reporting requirements for the utilities in the state (PA Title 52, Chapter 54, §§ 54.71-54.78). Historically, utilities offered various forms of assistance programs. As part of the transition to deregulated supply markets, universal service programs were defined as part of the statute and made mandatory for larger utilities, although utilities still offer various types of assistance programs.
Design & Admin.	Utility and/or Program Administrator	The programs are administered by the largest utilities in the state, which includes six electric utilities, seven gas utilities, and one combination electric and gas utility. Each of these utilities is required to submit a universal services plan every three years, which includes a projected needs assessment and projected enrollment level for its universal services programs for the upcoming three years (PA PUC 2012, p 34). The utilities' plans are then reviewed by the PA PUC.	Same as Discount, LIURP
	Intake Process	Utilities use a variety of methods to reach customers, and each utility uses a different approach. In general, local agencies and utility support staff communicate directly with eligible customers. They attempt to match customers' needs with existing utility and/or community programs. For example, PPL uses Customer Programs Directors (CPDs), who have responsibility for the day-to-day administration of the utilities universal service programs. PECO uses community partners that provide opportunities and access to resources that offer the assistance that low-income customers may need. Utilities identify potential enrollees through a variety of means such as, customer telephone inquires; when a customer receives energy assistance grants; referrals from community groups, other utilities or state agencies; public outreach sessions, community workshops and advocate-sponsored events for low income customers. After the utility identifies potential enrollees, its asks these customers if they are interested in receiving information about Universal Services programs, and provides information and applications to those who are interested.	Utilities use a variety of methods to reach customers, and each utility uses a different approach. In general, local agencies and utility support staff communicate directly with eligible customers. They attempt to match customers' needs with existing utility and/or community programs. For example, PPL uses Customer Programs Directors (CPDs), who have responsibility for the day-to-day administration of the utilities universal service programs. PECO uses community partners that provide opportunities and access to resources that offer the assistance that low-income customers may need. Utilities identify potential enrollees through a variety of means such as, customer telephone inquires; when a customer receives energy assistance grants; referrals from community groups, other utilities or state agencies; public outreach sessions, community workshops and advocate-sponsored events for low income customers. After the utility identifies potential enrollees, its asks these customers if they are interested in receiving information about Universal Services programs, and provides information and applications to those who are interested.
	Program Design	An alternative collection method that provides payment assistance. CAP participants agree to make regular monthly payments that are for an amount that is less than the current bill in exchange for continued provision of electric utility services. The individual programs do have some variances from the CAP Policy Statement. One area in particular that may vary is the amount of the maximum CAP credit. The CAP discount has an arrearage forgiveness component, which is provided generally over a two to three year period. The customer receives arrearage forgiveness for each on-time, in full CAP payment received. The structure and exact requirements of the arrearage forgiveness program is established on a case by case basis through plan filings.	This program helps selected, payment-troubled customers maximize their ability to pay utility bills. Provides a casework approach to help customers secure energy assistance funds and other needed services. The structure and requirements of the CARES program varies from utility to utility. For example, the emphasis of NFG's CARES Program is towards those customers with short-term and temporary hardships. Qualifying households may receive counseling and/or direct referrals to community resources that can aid in resolving the emergency.
	Delivery Mechanics	Payments are made directly to companies on behalf of eligible customers.	As utilities have expanded their CAP programs, the focus of CARES has changed, and is now a component of CAP. CARES is a component of CAP for each of the utilities that are required to maintain a CAP program.
	Eligibility Requirements	At or below 150 percent of federal poverty guidelines; must have made a payment agreement with their utility. The CAP Policy Statement states that customers should apply for LIHEAP. The LIHEAP grant may be applied to either the electric or natural gas account. There is not a requirement that customers receive a LIHEAP grant in order to participate in CAP.	Payment-troubled customers. CARES is about referring CAP customers to other available resources in the community. For example, PECO's CARES program directs its CARES resources to customers at or below 50% of the Federal Poverty Level (FPL). PECO's CARES resources are provided for customers who are low-income; have "special needs" which are defined as CAP customers below 50% of the Federal Poverty Level; and have extenuating circumstances. NFG's CARES Program, however, directs its resources to low income, fixed income, special needs, and payment troubled customers who are experiencing short-term financial hardships. The CAP Policy Statement states that customers should apply for LIHEAP. The LIHEAP grant may be applied to either the electric or natural gas account. There is not a requirement that customers receive a LIHEAP grant in order to participate in CARES. CARES provides information about resources available in the community, and LIHEAP may be one of those resources available.
Funding	Funding Source	Program costs are included in utility rates as part of the distribution cost passed on to all residential customers. The costs may be collected through distribution base rates and/or a universal service surcharge mechanism.	CARES is funded as part of the universal service program surcharge. It is not funded by LIHEAP cash and crisis grants.
	How Funding Levels are Established	CAP Programs must be cost-effective, but there is no specific formula for establishing the budget level for the CAP programs. The budgets are determined on a case by case basis by the PA PUC. The utilities presents a proposed budget in its three-year Universal Service and Energy Conservation Plan. In that proceeding, the utilities will present a Needs Assessment based on the company's current CAP enrollment levels and the U.S. Census results in the service territory. In the filing, the utility will make a proposal about how much to ramp up the program each year, and the parties will evaluate the proposal and may make recommendations in the case. The size and costs of the programs varies depending upon the needs of the service territory and from utility to utility. Funding levels are sometimes negotiated as part of disposition of rate cases or other dockets, such as merger applications.	CAP Programs must be cost-effective, but there is no specific formula for establishing the budget level for the CAP programs. The budgets are determined on a case by case basis by the PA PUC. The utilities presents a proposed budget in its three-year Universal Service and Energy Conservation Plan. In that proceeding, the utilities will present a Needs Assessment based on the company's current CAP enrollment levels and the U.S. Census results in the service territory. In the filing, the utility will make a proposal about how much to ramp up the program each year, and the parties will evaluate the proposal and may make recommendations in the case. The size and costs of the programs varies depending upon the needs of the service territory and from utility to utility. Funding levels are sometimes negotiated as part of disposition of rate cases or other dockets, such as merger applications.
	Funding Dedicated to Program Admin.	In 2011 and again in 2012, the utilities' weighted average spending on administration costs was 4% of overall costs.	In 2011 and again in 2012, the utilities' weighted average spending on administration costs was 4% of overall costs.
	Entity Receiving Admin. Funding and Why	Utilities receive administrative funding as they are the ones that implement the programs.	Utilities receive administrative funding as they are the ones that implement the programs.
Other	Program Results/ Impacts	Electric CAP spending for 2012 totaled $234.4 million and gas CAP spending was $105.3 million, with 309,570 customers enrolled in electric utility programs and 175,015 in gas utility programs. In 2011, electric CAPs spent $250 million and enrolled 306,213 households, and gas CAPs spent $151.7 million and enrolled 189,690. In 2012, 37% of electric arrearages (in dollars) were on an agreement plan.	Electric CAP spending for 2012 totaled $234.4 million and gas CAP spending was $105.3 million, with 309,570 customers enrolled in electric utility programs and 175,015 in gas utility programs. In 2011, electric CAPs spent $250 million and enrolled 306,213 households, and gas CAPs spent $151.7 million and enrolled 189,690. In 2012, 37% of electric arrearages (in dollars) were on an agreement plan.
	Other	From 2011 to 2012, there was a 6% decrease in residential electric terminations.	From 2011 to 2012, there was a 6% decrease in residential electric terminations.

Pennsylvania, PPL

Overview	Program Type	**Rate Assistance**
	Program Name	PPL Electric Utilities On Track
	Reason/Mechanism for Establishing Program	Competition Acts require Commission to ensure universal service and energy conservation services and to continue, at a minimum, the same level and nature of consumer protection policies and services that were in place at the time the Competition Acts became effective.
Design & Admin.	Utility and/or Program Administrator	Commission's Universal Service and Energy Conservation Reporting Requirements require each large EDC to submit a universal service and energy conservation Plan every 3 years for approval.
	Intake Process	CSRs refer payment-troubled customers to the CBOs. DurMust have proof of income. PPL uses 10 CBOs [2 county government offices and 8 C0mmunity Action Agencies - nonprofits that administer LIHEAP] to administer OnTrack 65 caseworkers at 27 sites.
	Program Design	Primary features: Reduced payment arrangement based on ability to pay [flat monthly payment at program-determined level]. Arrearage forgiveness over 18 mos. Protection against shutoff of electric service. Referrals to other programs and services PL Electric establishes an 18-month debt forgiveness plan. 4 major purposes: 1. Improve customers' bill payment habits and attitudes; 2. Stabilize or reduce customers' energy usage; 3. Eliminate uncollectible balances for program participants; and 4. Provide the customer with other beneficial services and/or programs through a network CBOs.
	Delivery Mechanics	Presently 5 methods for determining affordable amount. All have effect of relating pmt requirement to customer's % of FPL. Small charge to defray part of back balances.
	Eligibility Requirements	Act does not define “affordability;” PAPUC Policy Statement provides guidance. PPL's CAP available to customers with incomes at or below 150% of the FPL, and who are "payment-troubled."
Funding	Funding Source	PAPUC must ensure that the utilities run the programs in a cost-effective manner. Utilities recover approved costs through universal service charge on all customers.
	How Funding Levels are Established	The Company has proposed CAP expenditure funding of approximately $56.6 million in 2014, $62.8 million in 2015, and $65.4 million in 2016.
	Funding Dedicated to Program Admin.	Most recent 3-Year Plan recites intention to bring collection functions in house to save money.
	Entity Receiving Admin. Funding and Why	Utility through Universal Service Charge; CBOs through contracts with utility.
Other	Program Results/ Impacts	Not available at this time.
	Other	In 2012, for example, CSRs made nearly 120,000 referrals to OnTrack administering organizations prompted by information provided by customers apply in person.

Seattle, Washington

Overview	Program Type	**Rate Assistance**
	Program Name	Seattle Utility Discount Program
	Reason/Mechanism for Establishing Program	City leaders consider Seattle electric rates high, and living costs high and rising, and want to make sure all in City can afford utilities.
Design & Admin.	Utility and/or Program Administrator	Seattle City Light and City of Seattle Human Services Department per Memorandum of Agreement with Seattle City Light utility.
	Intake Process	Not available at this time.
	Program Design	60% discount off electricity bill [Note: Seattle Public Utilities offers companion 50% discount from water/sewer/trash removal bills].
	Delivery Mechanics	Rendered bill is regular rate discounted 60%.
	Eligibility Requirements	Seattle City Light customer, =/<70% of state minimum income, not living in subsidized housing.
Funding	Funding Source	Cost allocation in rates; i.e. other ratepayers.
	How Funding Levels are Established	Utility's rates are set every 2 years by mayor and city council.
	Funding Dedicated to Program Admin.	2014 budget - $8.1 million [including $87.85 per client for SPU admin].
	Entity Receiving Admin. Funding and Why	Seattle City Light has 9 FTEs; Human Services Department has 13.5 FTEs for electricity and water/sewer MOA work combined. SCL and SDP split MOA admin costs 56/44 based on relative size of customer base.
Other	Program Results/ Impacts	2014 expected average benefit: $8.8 million/16,800 participants = $524
	Other	In 2014, mayor and city utilities began a multi-year effort to raise participation.

United Kingdom

	Program Type	Rate Assistance (1)	Rate Assistance (2)	Rate Assistance (3)
Overview	Program Name	Warm Home Discount scheme	Winter Fuel Payments	Cold Weather Payments
	Reason/Mechanism for Establishing Program	To address those who are income poor.	To address seniors who are likely to be income/fuel poor.	To address those who are fuel poor, not necessarily income poor.
Design & Admin.	Utility and/or Program Administrator	Department of Energy and Climate Change (DECC)/Ofgem/Npower (not every supplier provides this discount to low income customers)	Department for Work and Pensions (DWP)	Department for Work and Pensions (DWP)
	Intake Process	Automatic, no application is necessary. If a customer meets the conditions set out in law, they will receive a payment or grant. If they are not happy with the decision, they, or someone else who has the authority to act on their behalf, can 1) ask for an explanation, 2) ask for a written statement of reasons for the decision, 3) ask for the agency to look again at the decision or 4) appeal against the decision to an independent tribunal (this must be in writing). Customers can do any or all of these actions.	Automatic, no application is necessary. If a customer meets the conditions set out in law, they will receive a payment or grant. If they are not happy with the decision, they, or someone else who has the authority to act on their behalf, can 1) ask for an explanation, 2) ask for a written statement of reasons for the decision, 3) ask for the agency to look again at the decision or 4) appeal against the decision to an independent tribunal (this must be in writing). Customers can do any or all of these actions.	Automatic, no application is necessary. If a customer meets the conditions set out in law, they will receive a payment or grant. If they are not happy with the decision, they, or someone else who has the authority to act on their behalf, can 1) ask for an explanation, 2) ask for a written statement of reasons for the decision, 3) ask for the agency to look again at the decision or 4) appeal against the decision to an independent tribunal (this must be in writing). Customers can do any or all of these actions. Customers who have recently had a child or are caring for a child younger than five may need to inform the agency that provides these funds.
	Program Design	An annual rebate of £140 provided to vulnerable customers in or at risk of fuel poverty.	Annual tax-free cash transfers of between £100-300 to seniors. The amount paid depends on where you live (i.e., care facility or at home), how many people you live with and the ages of those people. These living conditions are assessed during one qualifying week per year. There is no customer obligation to spend any of the payment on energy.	£25 to vulnerable customers for each seven day period of "very cold weather" between 1 November and 31 March. Vulnerable customers are defined as those on income support or those who receive pension credit and are disabled, have a child who is disabled, or are raising a child younger than five years old. Very cold weather is defined as when the local temperature is either recorded as, or forecast to be, an average of zero degrees Celsius or below over 7 consecutive days.
	Delivery Mechanics	DECC is currently coordinating aid to the Core Group of eligible, Ofgem the remaining three. The Scheme is divided into four groups, namely the Core Group, the Broader Group, Legacy Spend and Industry Initiatives. The Core group and Broader group are the two major components of the scheme.	Payments are made directly into the customer's nominated bank account, without restriction on how they are spent.	Monitored by the DWP. Benefits are paid automatically into the same customer account as the one in which they receive their benefit payments. Customers receive payments within 14 working days after each period of cold weather. Participation in this program does not preclude participation in any of the other programs.
	Eligibility Requirements	The Core Group is comprised of poorer pensioner households identified by the Department of Work and Pensions (DWP). The DWP shares information about recipients of Pension Credits with retailers. Eligible Core group members receive an automatic annual rebate on their energy bill. Customers must apply to be a member of the Broader Group and they must receive certain additional benefits to be eligible. Suppliers are also required to provide annual rebates to these customers, but suppliers set the eligibility criteria, in line with WHD regulations. As an example, Npower's customers are considered part of the Broader Group if they receive any of 1) Income support/Income based jobseeker's allowance/income related employment and support allowance; 2) and one of Child tax credit/disability premium/Disability Living Allowance/Long Term Incapacity Benefit.	Customers are eligible if they are recipients of State pensions or another social security benefit (excluding Housing Benefit, Council Tax Benefit and Child Benefit). Generally, they are eligible if they were born on or before July 5, 1951 (date changes every year) and normally live in the UK throughout the coldest week in September. The amount available depends on whether the customer meets certain additional criteria. For example, eligible customers aged 80 or over on a Pension Credit will receive £300, whereas an eligible customer living with someone who also qualifies will receive just £100.	Customers are generally eligible if they receive benefits including Pension Credit, Income Support, Jobseeker's Allowance (assuming they meet sub-criteria such as receiving a Child Tax Credit), and Employment and Support Allowance (assuming they meet sub-criteria such as receiving a severe or enhanced disability premium).
Funding	Funding Source	Energy suppliers	The Social Fund	The Social Fund
	How Funding Levels are Established	The Warm Home Discount Scheme that came into effect on April 1, 2011 provides £1.13b to fuel poor customers over the four years until 2015.	Mandated by law.	Mandated by law.
	Funding Dedicated to Program Admin.	Not available at this time.	Department for Work and Pensions (DWP), possibly others	Department for Work and Pensions (DWP), possibly others
	Entity Receiving Admin. Funding and Why	Not available at this time.	Not available at this time.	Not available at this time.
Other	Program Results/ Impacts	70% of Core group recipients are actually defined as fuel poor.	41% of recipients actually do use the payment for energy when the benefit is earmarked as a transfer to assist with energy bills (compared to just 3% when it is marked as income alone). One major concern is that this measure fails to target vulnerable groups, as only 26% of recipients are fuel poor.	This policy targets low-income households quite effectively, as it is restricted only to customers receiving certain benefits. Many of these households are also likely to be vulnerable to rising energy bills. From a targeting perspective, this is viewed as a more precise measure than the Winter Fuel Payments However, it is difficult to predict the number of days of extreme weather on which payments must be made to vulnerable customers, and as such, budgeting can be difficult and imprecise.
	Other	Not available at this time.	Not available at this time.	Not available at this time.

United States Federal Programs (LIHEAP)

Overview	Program Type	**Cash Grant**
	Program Name	Low Income Home Energy Assistance Program (LIHEAP)
	Reason/Mechanism for Establishing Program	Originally a response by federal government to skyrocketing costs as a result of Arab oil embargo, and funded with oil overcharge income from oil producers. In 1981, brought into federal budget. Continued year to year to address energy affordability.
Design & Admin.	Utility and/or Program Administrator	Federal government sends block grants [not entitlement program] to states, tribes and territories, most of which sub grant to local agencies, mostly "Community Action Agencies", to administer program. CAAs are private, non-profit corporations, established under state law but in accordance with federal guidelines, to receive and administer certain funds for low-income households and communities. Cities and other local entities provide administration in some areas. "In 2014, all 50 states, the District of Columbia, five U.S. territories (Puerto Rico, Virgin Islands, America Samoa, Commonwealth of the Northern Mariana Islands, and Guam), and 154 tribes or tribal organizations received LIHEAP grants." LIHEAP 101, at 1.
	Intake Process	Conducted by sub grantees. Wide discretion in selecting approach. Valuable alternatives to or additions to information and referral include: (a) matching customer lists with lists of those receiving other means-tested assistance, with automatic enrollment [sometimes with opt-out], (b) unitary application for all benefits - only one application needed, (c) requirements that households seeking utility program assistance apply for LIHEAP for that utility's bills. Households reapply each year. If they are eligible, agency calculates grant per that year's formulae, and typically the award is paid to the energy vendor in the household's name.
	Program Design	Block grant to states, the District of Columbia, territories and commonwealths, and Indian tribal organizations, to fund assistance to low-income households in paying for home energy needs. From APSE: Small portion of federal dollars support leveraging incentive funds to reward states for raising additional funding from nonfederal sources, and funds for demonstration projects that focus on the intersection of energy, health and safety. States have the discretion to use up to 15 percent of their LIHEAP grants (or up to 25 percent with an approved waiver) for weatherization activities." Federal government sets broad policy choices on eligibility and administration, states set state policies within those limits. Typically funds to assist eligible households are paid directly to vendors.
	Delivery Mechanics	"Cash" grant on behalf of participant paid to designated utility, one time per year for regular grant.
	Eligibility Requirements	From APSE: "The LIHEAP statute requires that each grantee set income eligibility thresholds at or below 150 percent of the HHS poverty guidelines or 60 percent of the state median income, provided that no income threshold is lower than 110 percent of the HHS poverty guidelines. Each grantee has the discretion to set the specific income threshold as well as define countable and noncountable income. Grantees also have the option of applying assets tests and creating additional eligibility requirements not related to income." Households with highest energy burden and/or including children/disabled persons/persons 65+ should get priority, but often it is first-come-first served in practice. Must apply each year, but many CAAs send opt-in or opt-out letters to past recipients.
Funding	Funding Source	Federal annual appropriations. In a few cases supplemented by state appropriations. Often administered in tandem with other low-income energy assistance programs, such as utility discount rates.
	How Funding Levels are Established	Congress authorizes and appropriates funds in each year, based on its conception of need, when seen in context of overall budget considerations. States may determine how to distribute the funds [e.g. a little to many households or a lot to fewer households]. The statute provides for two types of funding: regular funds (sometimes referred to as block grant funds) and emergency contingency funds. Regular funds are allocated to grantees based on a formula, while contingency funds may be released to one or more grantees at the discretion of the Secretary of the Department of Health and Human Services based on emergency need. Regular LIHEAP funds are allocated to the states according to a formula that has a long history, and is complicated. When Congress reauthorized LIHEAP in 1984 (P.L. 98-558), it changed the program's formula by requiring the use of more recent population and energy data and requiring that HHS consider both heating and cooling costs of low-income households (a change from the focus on the heating needs of all households). The effect of these changes meant that, in general, funds would be shifted from cold-weather states to warm-weather states. To prevent a dramatic shift of funds, Congress added two "hold-harmless" provisions to the formula. The result of these provisions is a three-tiered formula (sometimes referred to as the "new" formula), the application of which depends on the amount of regular funds that Congress appropriates.
	Funding Dedicated to Program Admin.	State programs limited to 10%. Tribal programs limited to 15% depending on size.
	Entity Receiving Admin. Funding and Why	State agency and program delivery entities [e.g. Community Action agencies.]. To cover administrative costs - note, states and other block grantees have considerable leeway in defining administrative costs.
Other	Program Results/ Impacts	"The historic funding low was in 1996 with just $900 million in regular funds, supplemented by $480 million in emergency funds. The historic high was 2009, when the program received $5.1 billion. Similarly, the number of households served has varied from a low of about 3.6 million in 1999 to a high of 9.5 million in 2011." LIHEAP 101, at 5. The National Energy Assistance Directors' Association (NEADA) representing the state directors of the LIHEAP programs reported that the FY 2013 Congressional budget cuts kept 300,000 families from receiving heating or cooling assistance. NEADA Press Release November 14, 2104. The cuts reduced total funding by about $155 million [from $3.47 billion to $3.32 billion]. As a direct result of that first round of budget cuts, the total number of households receiving home heating assistance declined by 194,000 from 6.9 million in FY 2012 to about 6.7 million in FY 2013 and those receiving cooling assistance declined by about 104,000 from 1.1 million to about 996,000. As a result of budget cuts in recent years the total number of households receiving assistance declined by 17% from about 8.1 million in FY 2010 to 6.7 million in FY 2013. Cuts enacted since FY 2010 have reduced the program's purchasing power from 52.5% of the cost of home heating for the average household to 44% during the 2012-2013 winter heating season. Higher fuel costs and further budget cuts were forecast to drop the purchasing power to 41% of home heating during the 2013-2014 heating season.
	Other	Not available at this time.

Appendix B: Research Detail by Research Area

Introduction

Appendix B provides the same detailed results of the research conducted for the jurisdictions provided in Appendix A. However, the information is presented by research area, rather than by jurisdiction.

Reason / Mechanism for Establishing Program

Jurisdiction	Program Type	Program Name	Reason/Mechanism for Establishing Program
Australia, Federal	Rate Assistance	Energy concessions	Currently, energy concessions and hardship payments for vulnerable customers are provided by State and Territory Governments under the Australian Energy Market Agreement (2006), which opened retail electricity to competition.
	Emergency Assistance	Hardship assistance	Energy concessions and hardship payments for vulnerable customers are provided by State and Territory Governments under the Australian Energy Market Agreement (2006), which opened retail electricity to competition.
	Other (1)	Australia Utility Allowance	Supplement basic assistance grants to those receiving disability support pension, partner allowance or widow allowance.
	Other (2)	Household Assistance Package	Government created a $15(AU) billion package when carbon tax enacted, to cushion price increase impacts. With the repeal of the carbon tax effective July 1, 2014, the Australian government revised the Clean Energy Supplement, which had been paid automatically to pensioners, families who receive family assistance, and others on government income support. The Clean Energy Supplement was a "sweetener" added to household assistance when the carbon tax was enacted. Originally proposed to be eliminated when the carbon tax was repealed, it was retained, and renamed the "Energy Supplement." In addition, the rate of payment as of 30 June 2014 was fixed for future payments, rather than increasing in future as had been the case with the Clean Energy Supplement.
Australia, Victoria	Rate Assistance	Annual Electricity Concession	The Victorian Hardship Enquiry's Main Report established the following core principles or reasons for supporting vulnerable energy customers: that energy should be provided on 'fair and reasonable' terms, that a legitimate inability to pay should not result in disconnection, and that there is a balance to be struck between consumer welfare and the commercial realities that energy companies face.
	Off-peak concession	Off-peak concession	Introduced in response to large increases in off-peak prices in the early 2000s.
	Other State-specific (1)	Service-to-property-charge	To assist vulnerable customers with rising energy bills by removing monthly charge for line extension.
	Other State-specific (2)	Electricity Transfer Fee Waiver	To assist vulnerable customers wishing to shop for competitive supplier.
California	Rate Assistance	California Alternate Rates for Energy	Commission authorized; statutory requirement and limits; Cal. Pub. Util. Code §382.
	Rate Design (1)	Medical Baseline	To assist customers with medical needs for electricity.
	Rate Design (2)	Family Energy Rate Assistance	To help large families with utility bills.
Colorado	Rate Assistance - PIPP	Percentage of Income Payment	Established in 2012. Mandated by the CPUC which oversees the utilities and regulates the terms.
	State Energy Assistance	Low Income Energy Assistance	To help address declining federal LIHEAP funding.
Illinois	Rate Assistance	Percentage of Income Payment Plan (PIPP)	First required by the Low Income Home Energy Assistance Act of 1981, and amended by Illinois Energy Assistance Act of 1989. The Illinois Energy Assistance Act (IL EAA) details the requirements for low-income energy assistance programs in the state. The IL EAA requires four programs: (1) the energy assistance program, (2) a state weatherization program, (3) the percentage of income payment plan (PIPP or PIP), and (4) an arrearage reduction program as part of the PIPP. The Department of Commerce and Economic Opportunity (DCEO) (the state department that sponsors statewide economic development) has interpreted the IL EAA such that LIHEAP carries out the energy assistance program requirements of the IL EAA. (305 ILCS 20; IL LIHEAP 2014c).
New York	Rate Assistance (2)	ConEd's Low Income Program	Since 1989, the New York PSC has directed the creation and expansion of targeted low-income rate assistance program. The New York legislature has had little involvement.
Pennsylvania	Discount, DSM, credit and collection rules	Customer Assistance Programs (CAPs) Discount	Pennsylvania statute requires protections, policies, and services that assist low-income customers to maintain electric service known as Universal Services and Energy Conservation. This term also includes customer assistance programs, termination of service protection and policies and services that help low-income customers to reduce or manage energy consumption in a cost-effective manner, such as the low-income usage reduction programs, application of renewable resources and consumer education. (PA Title 66, Chapter 28, §§2802(10), 2803). To fulfill the Universal Services and Energy Conservation requirements, the Pennsylvania Public Utility Commission (PA PUC) established standard reporting requirements for the utilities in the state (PA Title 52, Chapter 54, §§ 54.71-54.78). Historically, utilities offered various forms of assistance programs. As part of the transition to deregulated supply markets, universal service programs were defined as part of the statute and made mandatory for larger utilities, although utilities still offer various types of assistance programs.
	Emergency Assistance	Customer Assistance and Referral Evaluation Services (CARES)	Pennsylvania statute requires protections, policies, and services that assist low-income customers to maintain electric service known as Universal Services and Energy Conservation. This term also includes customer assistance programs, termination of service protection and policies and services that help low-income customers to reduce or manage energy consumption in a cost-effective manner, such as the low-income usage reduction programs, application of renewable resources and consumer education. (PA Title 66, Chapter 28, §§2802(10), 2803). To fulfill the Universal Services and Energy Conservation requirements, the Pennsylvania Public Utility Commission (PA PUC) established standard reporting requirements for the utilities in the state (PA Title 52, Chapter 54, §§ 54.71-54.78). Historically, utilities offered various forms of assistance programs. As part of the transition to deregulated supply markets, universal service programs were defined as part of the statute and made mandatory for larger utilities, although utilities still offer various types of assistance programs.
Pennsylvania, PPL	Rate Assistance	PPL Electric Utilities On Track	Competition Acts require Commission to ensure universal service and energy conservation services and to continue, at a minimum, the same level and nature of consumer protection policies and services that were in place at the time the Competition Acts became effective.
Seattle, Washington	Rate Assistance	Seattle Utility Discount Program	City leaders consider Seattle electric rates high, and living costs high and rising, and want to make sure all in City can afford utilities.
United Kingdom	Rate Assistance (1)	Warm Home Discount scheme	To address those who are income poor.
	Rate Assistance (2)	Winter Fuel Payments	To address seniors who are likely to be income/fuel poor.
	Rate Assistance (3)	Cold Weather Payments	To address those who are fuel poor, not necessarily income poor.
US Federal (LIHEAP)	Cash Grant	Low Income Home Energy Assistance Program (LIHEAP)	Originally a response by federal government to skyrocketing costs as a result of Arab oil embargo, and funded with oil overcharge income from oil producers. In 1981, brought into federal budget. Continued year to year to address energy affordability.
	Emergency Assistance	LIHEAP Emergency Assistance	In addition to the block grant, LIHEAP has included emergency contingency funds that may be released by the Secretary of HHS during times of energy price increases or extreme weather (although no contingency funds have been appropriated since 2011).

Utility and/or Program Administrator

Jurisdiction	Program Type	Program Name	Utility and/or Program Administrator
Australia, Federal	Rate Assistance	Energy concessions	In Australia, energy concessions (payments targeted at vulnerable customers to assist them to pay their energy bills) are predominately provided by state and territory governments and administered by energy retailers as an automatic deduction from energy bills.
	Emergency Assistance	Hardship assistance	The Australian Capitol Territory (ACT), Tasmania and the Northern Territory Governments do not offer direct emergency hardship payments, although retailers in these states do operate hardship programs which involve bill smoothing and payment plans. The ACT has a hardship program operated by the ACT Civil and Administrative Tribunal, and provides an external avenue through which customers experiencing hardship may apply to be put onto a retailer's payment plan or into a hardship program. The Tribunal has the power to direct a retailer to discharge part or all of an outstanding energy bill, including any interest or fees incurred, in exceptional hardship circumstances.
	Other (1)	Australia Utility Allowance	In addition to state concessions, the Australian Government provides an energy concession – known as a Utilities Allowance – for those receiving the disability support pension, partner allowance or widow allowance.
	Other (2)	Household Assistance Package	Usually automatic.
Australia, Victoria	Rate Assistance	Annual Electricity Concession	Department of Human Services
	Off-peak concession	Off-peak concession	Department of Human Services
	Other State-specific (1)	Service-to-property-charge	Department of Human Services
	Other State-specific (2)	Electricity Transfer Fee Waiver	Department of Human Services
California	Rate Assistance	California Alternate Rates for Energy (CARE)	Pacific Gas & Electric/Utilities
	Rate Design (1)	Medical Baseline	Pacific Gas & Electric/Utilities
	Rate Design (2)	Family Energy Rate Assistance program	Pacific Gas & Electric/Utilities
Colorado	Rate Assistance - PIPP	Percentage of Income Payment Plans (PEAP)	Xcel Energy (4 other utilities also provide this program)
	State Energy Assistance	Low Income Energy Assistance Program (LEAP)	Colorado Department of Human Services (CDHS)
Illinois	Rate Assistance	Percentage of Income Payment Plan (PIPP)	Utilities serving more than 100,000 customers as of 1/1/2009 are required to offer the program, which includes Ameren Illinois, ComEd, Nicor Gas, and Peoples Gas/North Shore Gas.
New York	Rate Assistance (1)	Low-Income Rate Assistance (in general)	Administered by the utilities.
	Rate Assistance (2)	ConEd's Low Income Program	Con Edison, with assistance from human services agency eligibility determination or categorically-eligible.
Pennsylvania	Discount, DSM, credit and collection rules	Customer Assistance Programs (CAPs) Discount	The programs are administered by the largest utilities in the state, which includes six electric utilities, seven gas utilities, and one combination electric and gas utility. Each of these utilities is required to submit a universal services plan every three years, which includes a projected needs assessment and projected enrollment level for its universal services programs for the upcoming three years (PA PUC 2012, p 34). The utilities' plans are then reviewed by the PA PUC.
	Emergency Assistance	Customer Assistance and Referral Evaluation Services (CARES)	Same as Discount, LIURP
Pennsylvania, PPL	Rate Assistance	PPL Electric Utilities On Track	Commission's Universal Service and Energy Conservation Reporting Requirements require each large EDC to submit a universal service and energy conservation Plan every 3 years for approval.
Seattle, Washington	Rate Assistance	Seattle Utility Discount Program	Seattle City Light and City of Seattle Human Services Department per Memorandum of Agreement with Seattle City Light utility.
United Kingdom	Rate Assistance (1)	Warm Home Discount scheme	Department of Energy and Climate Change (DECC)/Ofgem/Npower (not every supplier provides this discount to low income customers)
	Rate Assistance (2)	Winter Fuel Payments	Department for Work and Pensions (DWP)
	Rate Assistance (3)	Cold Weather Payments	Department for Work and Pensions (DWP)
US Federal (LIHEAP)	Cash Grant	Low Income Home Energy Assistance Program (LIHEAP)	Federal government sends block grants [not entitlement program] to states, tribes and territories, most of which sub grant to local agencies, mostly "Community Action Agencies", to administer program. CAAs are private, non-profit corporations, established under state law but in accordance with federal guidelines, to receive and administer certain funds for low-income households and communities. Cities and other local entities provide administration in some areas. "In 2014, all 50 states, the District of Columbia, five U.S. territories (Puerto Rico, Virgin Islands, America Samoa, Commonwealth of the Northern Mariana Islands, and Guam), and 154 tribes or tribal organizations received LIHEAP grants." LIHEAP 101, at 1.
	Emergency Assistance	LIHEAP Emergency Assistance	Same as LIHEAP.

Intake Process

Jurisdiction	Program Type	Program Name	Intake Process
California	Rate Assistance	California Alternate Rates for Energy (CARE)	Application forms can be obtained from the utility, or completed online through the utilities' website. Application forms also are available through numerous community agencies. For PG&E's CARE program, no proof of income is necessary for enrollment. Once a customer's application is approved, they see the CARE/FERA Program and monthly savings listed on the first page of their bill. The CARE discount appears on the bill after the completion of a full billing cycle. Customers receive the discount for two years (or four years if they are on a fixed income). Three months before the discount expires, PG&E sends a letter and re-certification application giving customers the opportunity to reapply if they still qualify under the current program guidelines.
	Rate Design (1)	Medical Baseline	Customers may call utility or apply on line.
	Rate Design (2)	Family Energy Rate Assistance program	Customers may call utility or apply on line.
Colorado	Rate Assistance - PIPP	Percentage of Income Payment Plans (PEAP)	The State LEAP office provides utilities with data on LEAP approved households, which is used for direct outreach to these clients. Xcel Energy created a portal to assist counties with eligibility determination by transmitting daily data on customer heating costs to the state's centralized LIHEAP eligibility processing system.
	State Energy Assistance	Low Income Energy Assistance Program (LEAP)	CDHS sends out a mass mailing of applications prior to the start of the season to all previous year clients. New clients hear about the program through 1) mass media (tv and radio advertising, community columns, call-in with major news stations), 2) county local outreach with community agencies (flyers, brochures, events), 3) state website (w/ access to the application), 4) Program Eligibility Application Kit (PEAK) (website where clients can determine if they are eligible for LEAP) and 5) statewide heat help line where clients can call and get information.
Illinois	Rate Assistance	Percentage of Income Payment Plan (PIPP)	PIPP eligibility is determined by Local Administrative Agencies (LAAs). These are local community action agencies, other community-based organizations or units of local government that implement the LIHEAP at the local level. These agencies are responsible for the provision of outreach, referral, energy-related counseling and educational materials, taking applications, verifying eligibility information and issuing assistance payments to energy vendors. LAAs are required to notify applicants of their eligibility status within 30 days of the date the client application is complete. (DECO 2013, p 4). Applications for PIPPs are handled centrally by the state Department of Commerce and Economic Opportunity's Office of Energy Assistance and not through the individual vendors, but the participating utility companies have helped design the program from its beginning in 2011. The utilities offering PIPPs use a real-time integrated data system in which they enter and track customer information such as Social Security Number and termination status to aid in program administration. (ASPE 2014, p 30).
New York	Rate Assistance (1)	Low-Income Rate Assistance (in	Varies by utility.
	Rate Assistance (2)	ConEd's Low Income Program	The Company pays the out-of-pocket costs for the city and county [NYC and Westchester] Departments of Human Services to run a computer match twice a year of categorically-eligible households and the utility's residential customers. The utility sends a list of residential customers to the agency, which then conducts the computer match. The agency notifies the utility of the matches, and sends a letter advising the customer that she will be enrolled in the low-income program unless she opts out. The utility must enroll the customer within 30 days of receiving the information that the customer is a match.

Jurisdiction	Program Type	Program Name	Intake Process
Pennsylvania	Discount, DSM, credit and collection rules	Customer Assistance Programs (CAPs) Discount	Utilities use a variety of methods to reach customers, and each utility uses a different approach. In general, local agencies and utility support staff communicate directly with eligible customers. They attempt to match customers' needs with existing utility and/or community programs. For example, PPL uses Customer Programs Directors (CPDs), who have responsibility for the day-to-day administration of the utilities universal service programs. PECO uses community partners that provide opportunities and access to resources that offer the assistance that low-income customers may need. Utilities identify potential enrollees through a variety of means such as, customer telephone inquires; when a customer receives energy assistance grants; referrals from community groups, other utilities or state agencies; public outreach sessions, community workshops and advocate-sponsored events for low income customers. After the utility identifies potential enrollees, its asks these customers if they are interested in receiving information about Universal Services programs, and provides information and applications to those who are interested.
	Emergency Assistance	Customer Assistance and Referral Evaluation Services (CARES)	Utilities use a variety of methods to reach customers, and each utility uses a different approach. In general, local agencies and utility support staff communicate directly with eligible customers. They attempt to match customers' needs with existing utility and/or community programs. For example, PPL uses Customer Programs Directors (CPDs), who have responsibility for the day-to-day administration of the utilities universal service programs. PECO uses community partners that provide opportunities and access to resources that offer the assistance that low-income customers may need. Utilities identify potential enrollees through a variety of means such as, customer telephone inquires; when a customer receives energy assistance grants; referrals from community groups, other utilities or state agencies; public outreach sessions, community workshops and advocate-sponsored events for low income customers. After the utility identifies potential enrollees, its asks these customers if they are interested in receiving information about Universal Services programs, and provides information and applications to those who are interested.
Pennsylvania, PPL	Rate Assistance	PPL Electric Utilities On Track	CSRs refer payment-troubled customers to the CBOs. DurMust have proof of income. PPL uses 10 CBOs [2 county government offices and 8 C0mmunity Action Agencies - nonprofits that administer LIHEAP] to administer OnTrack 65 caseworkers at 27 sites.
United Kingdom	Rate Assistance (1)	Warm Home Discount scheme	Automatic, no application is necessary. If a customer meets the conditions set out in law, they will receive a payment or grant. If they are not happy with the decision, they, or someone else who has the authority to act on their behalf, can 1) ask for an explanation, 2) ask for a written statement of reasons for the decision, 3) ask for the agency to look again at the decision or 4) appeal against the decision to an independent tribunal (this must be in writing). Customers can do any or all of these actions.
	Rate Assistance (2)	Winter Fuel Payments	Automatic, no application is necessary. If a customer meets the conditions set out in law, they will receive a payment or grant. If they are not happy with the decision, they, or someone else who has the authority to act on their behalf, can 1) ask for an explanation, 2) ask for a written statement of reasons for the decision, 3) ask for the agency to look again at the decision or 4) appeal against the decision to an independent tribunal (this must be in writing). Customers can do any or all of these actions.
	Rate Assistance (3)	Cold Weather Payments	Automatic, no application is necessary. If a customer meets the conditions set out in law, they will receive a payment or grant. If they are not happy with the decision, they, or someone else who has the authority to act on their behalf, can 1) ask for an explanation, 2) ask for a written statement of reasons for the decision, 3) ask for the agency to look again at the decision or 4) appeal against the decision to an independent tribunal (this must be in writing). Customers can do any or all of these actions. Customers who have recently had a child or are caring for a child younger than five may need to inform the agency that provides these funds.
US Federal (LIHEAP)	Cash Grant	Low Income Home Energy Assistance Program (LIHEAP)	Conducted by sub grantees. Wide discretion in selecting approach. Valuable alternatives to or additions to information and referral include: (a) matching customer lists with lists of those receiving other means-tested assistance, with automatic enrollment [sometimes with opt-out], (b) unitary application for all benefits - only one application needed, (c) requirements that households seeking utility program assistance apply for LIHEAP for that utility's bills. Households reapply each year. If they are eligible, agency calculates grant per that year's formulae, and typically the award is paid to the energy vendor in the household's name.
	Emergency Assistance	LIHEAP Emergency Assistance	Same as LIHEAP.

Program Design

Jurisdiction	Program Type	Program Name	Program Design
Australia, Federal	Rate Assistance	Energy concessions	Energy concessions (payments targeted at vulnerable customers to assist them to pay their energy bills) are predominately provided by state and territory governments and administered by energy retailers as an automatic deduction from energy bills.
	Emergency Assistance	Hardship assistance	In contrast to regular energy concessions, hardship assistance payments (emergency payments to customers already in financial stress) are provided on a temporary basis.
	Other (1)	Australia Utility Allowance	Flat monthly grant.
	Other (2)	Household Assistance Package	Flat monthly grant.
Australia, Victoria	Rate Assistance	Annual Electricity Concession	17.5% discount on electricity bills
	Off-peak concession	Off-peak concession	13% discount on the off-peak tariff of electricity bills for households with separately metered electric hot water or slab heating. Not available in relation to the flexible or time-of-use tariffs enabled by a smart electricity meter or similar technology.
	Other State-specific (1)	Service-to-property-charge concession	Provides a reduction on the (fixed cents/day) supply charge for concession households with low electricity consumption. The concession is applied if the cost of electricity used is less than the supply (or service) charge. The service charge is then reduced to the same price as the electricity usage cost.
	Other State-specific (2)	Electricity Transfer Fee Waiver	Provides a full waiver of the fee that is normally payable to electricity retailers when there is a change of occupancy at a property.
California	Rate Assistance	California Alternate Rates for Energy (CARE)	30-35% discount off electric bill, depending on utility.
	Rate Design (1)	Medical Baseline	All residential customers are billed a certain amount of their natural gas and electricity use at their utility company's lowest residential rate. This is called the "Baseline Allowance" and it is set depending on what climate zone the home is in and whether it is the utility's "winter" or "summer" season. Extra allowances of natural gas and electricity are billed at the lowest rate for customers who rely on life support equipment, or those who have life threatening illnesses or compromised immune systems. The extra allowances are called Medical Baseline.
	Rate Design (2)	Family Energy Rate Assistance program	Families whose household income slightly exceeds the low-income energy program allowances will qualify to receive FERA discounts, which bills some of their electricity usage at a lower rate. FERA is available for customers of Southern California Edison, San Diego Gas and Electric Company, and Pacific Gas and Electric Company.
Colorado	Rate Assistance - PIPP	Percentage of Income Payment Plans (PEAP)	Monthly reductions in low-income customers' bills, both current and those in arrears. Also educates customers on ways to manage their monthly bill. Participants pay between 2 and 3 percent of their household income, and have the opportunity to have past-due amounts forgiven. Requires participants to be billed 3 percent of their electric bills and 3 percent of their gas bills, bringing their maximum total payment to six percent of income. Arrearage forgiveness plan forgives existing arrears over a 24-month period.
	State Energy Assistance	Low Income Energy Assistance Program (LEAP)	Pays a portion of a customers bill directly to their utility company.
Illinois	Rate Assistance	Percentage of Income Payment Plan (PIPP)	A bill payment assistance program for low-income customers. Participants pay no more than 6 percent of their income for gas and electric service. The maximum PIPP benefit is $1,800 per year, with a maximum of $100 per month for the participant's natural gas bill and $50 for the electric bill. The PIPP program has an arrearage reduction component, which provides participants with a monthly benefit towards their utility bill and a reduction in overdue payments for every on-time payment they make by the bill due date. Participants who make their monthly PIPP payments on time receive a monthly credit amounting to one twelfth of their past due bills, up to $1,000 total per year for both gas and electric bills. (305 ILCS 20/18, (c)(5);IL LIHEAP 2014c). The PIPP includes client education to inform customers about the PIPP and about their rights and responsibilities under the program. If clients miss their payments, the local agencies attempt to contact them and help them stay on the program. (IL LIHEAP 2014c).

Jurisdiction	Program Type	Program Name	Program Design
New York	Rate Assistance (1)	Low-Income Rate Assistance (in general)	Discounts off the basic monthly service charge for electricity and/or gas. Monthly discounts range from $2 to $24 off the monthly fixed customer charge. Some gas companies provide discounts on consumption up to a specified level. For example, Con Edison provides a 50 percent discount on the first 90 therms to 165,000 customers. Some of these programs offer arrearage forgiveness and case management as well. For example, KeySpan's "On-Track" program provides financial assistance, education, and energy and financial management to a limited number of low-income customers. Customers on the payment plan may receive credits on past due accounts.
	Rate Assistance (2)	ConEd's Low Income Program	Flat dollar reduction off monthly bill, plus waiver of reconnection fees.
Pennsylvania	Discount, DSM, credit and collection rules	Customer Assistance Programs (CAPs) Discount	An alternative collection method that provides payment assistance. CAP participants agree to make regular monthly payments that are for an amount that is less than the current bill in exchange for continued provision of electric utility services. The individual programs do have some variances from the CAP Policy Statement. One area in particular that may vary is the amount of the maximum CAP credit. The CAP discount has an arrearage forgiveness component, which is provided generally over a two to three year period. The customer receives arrearage forgiveness for each on-time, in full CAP payment received. The structure and exact requirements of the arrearage forgiveness program is established on a case by case basis through plan filings.
	Emergency Assistance	Customer Assistance and Referral Evaluation Services (CARES)	This program helps selected, payment-troubled customers maximize their ability to pay utility bills. Provides a casework approach to help customers secure energy assistance funds and other needed services. The structure and requirements of the CARES program varies from utility to utility. For example, the emphasis of NFG's CARES Program is towards those customers with short-term and temporary hardships. Qualifying households may receive counseling and/or direct referrals to community resources that can aid in resolving the emergency.
Pennsylvania, PPL	Rate Assistance	PPL Electric Utilities On Track	Primary features: Reduced payment arrangement based on ability to pay [flat monthly payment at program-determined level]. Arrearage forgiveness over 18 mos. Protection against shutoff of electric service. Referrals to other programs and services PL Electric establishes an 18-month debt forgiveness plan. 4 major purposes: 1. Improve customers' bill payment habits and attitudes; 2. Stabilize or reduce customers' energy usage; 3. Eliminate uncollectible balances for program participants; and 4. Provide the customer with other beneficial services and/or programs through a network CBOs.
Seattle, Washington	Rate Assistance	Seattle Utility Discount Program	60% discount off electricity bill [Note: Seattle Public Utilities offers companion 50% discount from water/sewer/trash removal bills].
United Kingdom	Rate Assistance (1)	Warm Home Discount scheme	An annual rebate of £140 provided to vulnerable customers in or at risk of fuel poverty.
	Rate Assistance (2)	Winter Fuel Payments	Annual tax-free cash transfers of between £100-300 to seniors. The amount paid depends on where you live (i.e., care facility or at home), how many people you live with and the ages of those people. These living conditions are assessed during one qualifying week per year. There is no customer obligation to spend any of the payment on energy.
	Rate Assistance (3)	Cold Weather Payments	£25 to vulnerable customers for each seven day period of "very cold weather" between 1 November and 31 March. Vulnerable customers are defined as those on income support or those who receive pension credit and are disabled, have a child who is disabled, or are raising a child younger than five years old. Very cold weather is defined as when the local temperature is either recorded as, or forecast to be, an average of zero degrees Celsius or below over 7 consecutive days.
US Federal (LIHEAP)	Cash Grant	Low Income Home Energy Assistance Program (LIHEAP)	Block grant to states, the District of Columbia, territories and commonwealths, and Indian tribal organizations, to fund assistance to low-income households in paying for home energy needs. From APSE: Small portion of federal dollars support leveraging incentive funds to reward states for raising additional funding from nonfederal sources, and funds for demonstration projects that focus on the intersection of energy, health and safety. States have the discretion to use up to 15 percent of their LIHEAP grants (or up to 25 percent with an approved waiver) for weatherization activities." Federal government sets broad policy choices on eligibility and administration, states set state policies within those limits. Typically funds to assist eligible households are paid directly to vendors.
	Emergency Assistance	LIHEAP Emergency Assistance	The 1998 reauthorization of LIHEAP added a new section that specified additional conditions under which LIHEAP emergency funds could be released, to include: 'a natural disaster, any other event meeting criteria the Secretary determines appropriate, or a significant increase in: (1) home energy supply shortages or disruptions; (2) the cost of home energy;(3) home energy disconnections; (4) participation in a public benefit program such as the food stamp program; or (5) a significant increase in unemployment or layoffs.' LIHEAP 101, at 4.

Delivery Mechanics

Jurisdiction	Program Type	Program Name	Delivery Mechanics
Australia, Federal	Emergency Assistance	Hardship assistance	Administration of hardship payments varies by jurisdiction. Hardship assistance is either directly provided by state governments or distributed in partnership with electricity retailers and charitable organizations such as St Vincent de Paul and the Salvation Army. The ACT has a hardship program operated by the ACT Civil and Administrative Tribunal.
Australia, Victoria	Rate Assistance	Annual Electricity Concession	Utility applies discount/government pays for discounts.
	Off-peak concession	Off-peak concession	Utility applies discount/government pays for discounts.
	Other State-specific (1)	Service-to-property-charge concession	Utility applies discount/government pays for discounts.
	Other State-specific (2)	Electricity Transfer Fee Waiver	Utility applies discount/government pays for discounts.
California	Rate Assistance	California Alternate Rates for Energy (CARE)	Utility renders discounted bill.
	Rate Design (1)	Medical Baseline	Utility renders discounted bill.
	Rate Design (2)	Family Energy Rate Assistance program	Utility renders discounted bill.
Colorado	Rate Assistance - PIPP	Percentage of Income Payment Plans (PEAP)	Utilities manage the program.
	State Energy Assistance	Low Income Energy Assistance Program (LEAP)	CDHS manages the program.
Illinois	Rate Assistance	Percentage of Income Payment Plan (PIPP)	The DCEO remits, through the LAAs, to the utility or participating alternative supplier that portion of the plan participant's bill that is not the responsibility of the participant. Essentially, the DCEO collects program funding (as described below), determines the customer's program eligibility, and pays the funding to the utility on behalf of the customer.
New York	Rate Assistance (1)	Low-Income Rate Assistance (in general)	Varies by utility.
	Rate Assistance (2)	ConEd's Low Income Program	Company has billing software to compute effect of discount off participating customers' bills.
Pennsylvania	Discount, DSM, credit and collection rules	Customer Assistance Programs (CAPs) Discount	Payments are made directly to companies on behalf of eligible customers.
	Emergency Assistance	Customer Assistance and Referral Evaluation Services (CARES)	As utilities have expanded their CAP programs, the focus of CARES has changed, and is now a component of CAP. CARES is a component of CAP for each of the utilities that are required to maintain a CAP program.
Pennsylvania, PPL	Rate Assistance	PPL Electric Utilities On Track	Presently 5 methods for determining affordable amount. All have effect of relating pmt requirement to customer's % of FPL. Small charge to defray part of back balances.
Seattle, Washington	Rate Assistance	Seattle Utility Discount Program	Rendered bill is regular rate discounted 60%.
United Kingdom	Rate Assistance (1)	Warm Home Discount scheme	DECC is currently coordinating aid to the Core Group of eligible, Ofgem the remaining three. The Scheme is divided into four groups, namely the Core Group, the Broader Group, Legacy Spend and Industry Initiatives. The Core group and Broader group are the two major components of the scheme.
	Rate Assistance (2)	Winter Fuel Payments	Payments are made directly into the customer’s nominated bank account, without restriction on how they are spent.
	Rate Assistance (3)	Cold Weather Payments	Monitored by the DWP. Benefits are paid automatically into the same customer account as the one in which they receive their benefit payments. Customers receive payments within 14 working days after each period of cold weather. Participation in this program does not preclude participation in any of the other programs.
US Federal (LIHEAP)	Cash Grant	Low Income Home Energy Assistance Program (LIHEAP)	"Cash" grant on behalf of participant paid to designated utility, one time per year for regular grant.
	Emergency Assistance	LIHEAP Emergency Assistance	Same as LIHEAP.

Eligibility Requirements

Jurisdiction	Program Type	Program Name	Eligibility Requirements
Australia, Federal	Emergency Assistance	Hardship assistance	In some states, payment eligibility is assessed by community welfare organizations on the basis of circumstances rather than automatic eligibility as a result of holding a Commonwealth concession card.
	Other (1)	Australia Utility Allowance	Not available at this time.
	Other (2)	Household Assistance Package	Given to pensioners, families who receive assistance and those on income support.
Australia, Victoria	Rate Assistance	Annual Electricity Concession	Commonwealth Concession card. Many of Australia's assistance programs are connected to concession cards, which are identification cards related to health care, seniors, students, veterans, low-income, and other types of situations that cause customers to be on low or fixed incomes.
	Off-peak concession	Off-peak concession	Commonwealth concession card.
	Other State-specific (1)	Service-to-property-charge concession	Commonwealth concession card.
	Other State-specific (2)	Electricity Transfer Fee Waiver	Commonwealth concession card.
California	Rate Assistance	California Alternate Rates for Energy (CARE)	Customers with incomes under 200% of the Federal Poverty Levels are eligible for CARE. Customers may also qualify they are enrolled in public assistance programs such as Medicaid/Medi-Cal, Women, Infants and Children Program (WIC), Healthy Families A & B, National School Lunch's Free Lunch Program (NSL), Food Stamps/SNAP, Low Income Home Energy Assistance Program (LIHEAP), Head Start Income Eligible (Tribal Only), Supplemental Security Income (SSI), Bureau of Indian Affairs General Assistance, and Temporary Assistance for Needy Families (TANF) or Tribal TANF. CARE is also available to the following PG&E customers: Tenants of Sub-Metered Residential Facilities Qualified Non-Profit Group Living Facilities Agricultural Employee Housing Facilities Migrant Farm Worker Housing Facilities.
	Rate Design (1)	Medical Baseline	Customers with household member needing life-support equipment. "Life support equipment" means equipment that uses mechanical or artificial means to sustain, restore, or supplant a vital function, or mechanical equipment that is relied upon for mobility both within and outside of buildings. This includes: All types of respirators, iron lungs, hemodialysis machines, suction machines, electric nerve stimulators, pressure pads and pumps, aerosol tents, electrostatic and ultrasonic nebulizers, compressors, IPBB machines and motorized wheelchairs. Also, in consideration of their increased heating and cooling needs, the Medical Baseline allowance is available to paraplegics and quadriplegics, multiple sclerosis patients, scleroderma patients, and people being treated for a life threatening illness or who have a compromised immune system.
	Rate Design (2)	Family Energy Rate Assistance program	Families whose household income slightly exceeds the low-income energy program allowances will qualify to receive FERA discounts, which bills some of their electricity usage at a lower rate. FERA is available for customers of Southern California Edison.
Colorado	Rate Assistance - PIPP	Percentage of Income Payment Plans (PEAP)	LEAP approved households.
	State Energy Assistance	Low Income Energy Assistance Program (LEAP)	150% FPG. Eligibility is based on household income and federal poverty guidelines. Those approved for this program may also receive Emergency Assistance.
Illinois	Rate Assistance	Percentage of Income Payment Plan (PIPP)	Up to 150 percent of federal poverty guidelines. The DCEO establishes the specific eligibility levels, and in so doing considers factors such as economic conditions, state and federal funding levels, and energy costs. PIPP eligibility is based on whether the customer is on retail competition, and whether their supply vendor collects the SLEAF charge. If the vendor does not collect the charge, then the customer cannot receive benefits from that funding source. PIPP participants have the option of signing up for PIPP or receiving a one-time direct vendor payment, either through LIHEAP funds or the ratepayer (meters charge) funds. If a customer participates in PIPP, it cannot participate in another energy assistance program for the year. (305 ILCS 20/18, (c)(2)).

Jurisdiction	Program Type	Program Name	Eligibility Requirements
New York	Rate Assistance (1)	Low-Income Rate Assistance (in general)	For most programs, households in receipt of or eligible for LIHEAP are automatically enrolled into the program.
	Rate Assistance (2)	ConEd's Low Income Program	Customers enrolled in the Utility Guarantee or Direct Vendor programs administered by local human resource agencies; receive benefits under Temporary Assistance for Needy Persons/Families, Safety Net Assistance, Supplemental Security Income, or the Supplemental Nutrition Assistance Program; or received a Home Energy Assistance Program [LIHEAP] grant in the last twelve months. In last rate case, low-income advocates urged that Medicaid receipt be added to the list of programs receipt of which make a customer "categorically eligible." The PSC deferred its decision, pending research to estimate how many Medicaid eligible customers are served by Con Edison that are not already participants in the electric low-income program. On August 21, Con Edison provided those numbers, along with its analysis of how its low-income program budget could adapt to any anticipated changes in volume.
Pennsylvania	Discount, DSM, credit and collection rules	Customer Assistance Programs (CAPs) Discount	At or below 150 percent of federal poverty guidelines; must have made a payment agreement with their utility. The CAP Policy Statement states that customers should apply for LIHEAP. The LIHEAP grant may be applied to either the electric or natural gas account. There is not a requirement that customers receive a LIHEAP grant in order to participate in CAP.
	Emergency Assistance	Customer Assistance and Referral Evaluation Services (CARES)	Payment-troubled customers. CARES is about referring CAP customers to other available resources in the community. For example, PECO's CARES program directs its CARES resources to customers at or below 50% of the Federal Poverty Level (FPL). PECO's CARES resources are provided for customers who are low-income; have "special needs" which are defined as CAP customers below 50% of the Federal Poverty Level; and have extenuating circumstances. NFG's CARES Program, however, directs its resources to low income, fixed income, special needs, and payment troubled customers who are experiencing short-term financial hardships. The CAP Policy Statement states that customers should apply for LIHEAP. The LIHEAP grant may be applied to either the electric or natural gas account. There is not a requirement that customers receive a LIHEAP grant in order to participate in CARES. CARES provides information about resources available in the community, and LIHEAP may be one of those resources available.
Pennsylvania, PPL	Rate Assistance	PPL Electric Utilities On Track	Act does not define "affordability;" PAPUC Policy Statement provides guidance. PPL's CAP available to customers with incomes at or below 150% of the FPL, and who are "payment-troubled."
Seattle, Washington	Rate Assistance	Seattle Utility Discount Program	Seattle City Light customer, =/<70% of state minimum income, not living in subsidized housing.
United Kingdom	Rate Assistance (1)	Warm Home Discount scheme	The Core Group is comprised of poorer pensioner households identified by the Department of Work and Pensions (DWP). The DWP shares information about recipients of Pension Credits with retailers. Eligible Core group members receive an automatic annual rebate on their energy bill. Customers must apply to be a member of the Broader Group and they must receive certain additional benefits to be eligible. Suppliers are also required to provide annual rebates to these customers, but suppliers set the eligibility criteria, in line with WHD regulations. As an example, Npower's customers are considered part of the Broader Group if they receive any of 1) Income support/Income based jobseeker's allowance/income related employment and support allowance; 2) and one of Child tax credit/disability premium/Disability Living Allowance/Long Term Incapacity Benefit.
	Rate Assistance (2)	Winter Fuel Payments	Customers are eligible if they are recipients of State pensions or another social security benefit (excluding Housing Benefit, Council Tax Benefit and Child Benefit). Generally, they are eligible if they were born on or before July 5, 1951 (date changes every year) and normally live in the UK throughout the coldest week in September. The amount available depends on whether the customer meets certain additional criteria. For example, eligible customers aged 80 or over on a Pension Credit will receive £300, whereas an eligible customer living with someone who also qualifies will receive just £100.
	Rate Assistance (3)	Cold Weather Payments	Customers are generally eligible if they receive benefits including Pension Credit, Income Support, Jobseeker's Allowance (assuming they meet sub-criteria such as receiving a Child Tax Credit), and Employment and Support Allowance (assuming they meet sub-criteria such as receiving a severe or enhanced disability premium).
US Federal (LIHEAP)	Cash Grant	Low Income Home Energy Assistance Program (LIHEAP)	From APSE: "The LIHEAP statute requires that each grantee set income eligibility thresholds at or below 150 percent of the HHS poverty guidelines or 60 percent of the state median income, provided that no income threshold is lower than 110 percent of the HHS poverty guidelines. Each grantee has the discretion to set the specific income threshold as well as define countable and noncountable income. Grantees also have the option of applying assets tests and creating additional eligibility requirements not related to income." Households with highest energy burden and/or including children/disabled persons/persons 65+ should get priority, but often it is first-come-first served in practice. Must apply each year, but many CAAs send opt-in or opt-out letters to past recipients.
	Emergency Assistance	LIHEAP Emergency Assistance	Same as LIHEAP.

Funding Source

Jurisdiction	Program Type	Program Name	Funding Source
Australia, Victoria	Rate Assistance	Annual Electricity Concession	Government
	Off-peak concession	Off-peak concession	Government
	Other State-specific (1)	Service-to-property-charge concession	Government
	Other State-specific (2)	Electricity Transfer Fee Waiver	Government
California	Rate Assistance	California Alternate Rates for Energy (CARE)	All ratepayers via nonbypassable volumetric charge on distribution services.
	Rate Design (1)	Medical Baseline	Residential cost responsibility is redistributed in rate design process.
	Rate Design (2)	Family Energy Rate Assistance program	All ratepayers - nonbypassble volumetric distribution charge.
Colorado	Rate Assistance - PIPP	Percentage of Income Payment Plans (PEAP)	Customer surcharges.
	State Energy Assistance	Low Income Energy Assistance Program (LEAP)	LIHEAP funding from the state as well as private funds from oil and gas companies, foundations, and private donations.
Illinois	Rate Assistance	Percentage of Income Payment Plan (PIPP)	There are two sources of funding for this program. The Supplemental Low-Income Energy Assistance Fund (SLEAF) is funded by voluntary donations from individuals, foundations, corporations, and other sources. The Energy Assistance Charge collects funds from all ratepayers to fund the assistance programs.
New York	Rate Assistance (1)	Low-Income Rate Assistance (in general)	Funded through utility rates recovered from all customer classes.
	Rate Assistance (2)	ConEd's Low Income Program	Funded through utility rates recovered from all customer classes.
Pennsylvania	Discount, DSM, credit and collection rules	Customer Assistance Programs (CAPs) Discount	Program costs are included in utility rates as part of the distribution cost passed on to all residential customers. The costs may be collected through distribution base rates and/or a universal service surcharge mechanism.
	Emergency Assistance	Customer Assistance and Referral Evaluation Services (CARES)	CARES is funded as part of the universal service program surcharge. It is not funded by LIHEAP cash and crisis grants.
Pennsylvania, PPL	Rate Assistance	PPL Electric Utilities On Track	PAPUC must ensure that the utilities run the programs in a cost-effective manner. Utilities recover approved costs through universal service charge on all customers.
Seattle, Washington	Rate Assistance	Seattle Utility Discount Program	Cost allocation in rates; i.e. other ratepayers.
United Kingdom	Rate Assistance (1)	Warm Home Discount scheme	Energy suppliers
	Rate Assistance (2)	Winter Fuel Payments	The Social Fund
	Rate Assistance (3)	Cold Weather Payments	The Social Fund
US Federal (LIHEAP)	Cash Grant	Low Income Home Energy Assistance Program (LIHEAP)	Federal annual appropriations. In a few cases supplemented by state appropriations. Often administered in tandem with other low-income energy assistance programs, such as utility discount rates.
	Emergency Assistance	LIHEAP Emergency Assistance	Same as LIHEAP.

How Funding Levels are Established

Jurisdiction	Program Type	Program Name	How Funding Levels are Established
Australia, Federal	Emergency Assistance	Hardship assistance	Hardship payments are more variable in nature among the states than regular concessions, with amounts paid on a case-by-case basis, as assessed by the relevant department.
Australia, Victoria	Rate Assistance	Annual Electricity Concession	Budget Process
	Off-peak concession	Off-peak concession	Budget Process
	Other State-specific (1)	Service-to-property-charge concession	Budget Process
	Other State-specific (2)	Electricity Transfer Fee Waiver	Budget Process
California	Rate Assistance	California Alternate Rates for Energy (CARE)	Low Income needs assessment as required by Cal. Pub. Util. Code §382(d); participation of customers and effect of applicable discounts.
	Rate Design (1)	Medical Baseline	Function of participation and associated rates.
	Rate Design (2)	Family Energy Rate Assistance program	Function of participation and associated rates.
Illinois	Rate Assistance	Percentage of Income Payment Plan (PIPP)	Funding levels are based on availability for each funding source. The SLEAF level of funding is based on the donations provided. The Energy Assistance Charge is as follows: residential customers are charged $0.48 a month, small C&I customers are charged $4.80 a month, and large C&I customers are charged $360 a month.
New York	Rate Assistance (1)	Low-Income Rate Assistance (in general)	Rate cases and settlements.
	Rate Assistance (2)	ConEd's Low Income Program	In most recent rate case, 13-E-0030, order issued 2-14-14, all but low-income intervenors agreed to settlement that would set the budget at $[US] 47.5 million, assuming a $9.50 per month per participant bill reduction (up from $8.50), and the program having on average, approximately 417,000 customers. Con Edison reported in August that adding Medicaid as qualifying means-tested program for categorical eligibility would add 129,000 more customers to program. Assuming same $9.50 credit for all participants, the budget would have to increase by about $15 million, to $65.2 million for rate credits. The Commission has not ruled on the issue.
Pennsylvania	Discount, DSM, credit and collection rules	Customer Assistance Programs (CAPs) Discount	CAP Programs must be cost-effective, but there is no specific formula for establishing the budget level for the CAP programs. The budgets are determined on a case by case basis by the PA PUC. The utilities presents a proposed budget in its three-year Universal Service and Energy Conservation Plan. In that proceeding, the utilities will present a Needs Assessment based on the company's current CAP enrollment levels and the U.S. Census results in the service territory. In the filing, the utility will make a proposal about how much to ramp up the program each year, and the parties will evaluate the proposal and may make recommendations in the case. The size and costs of the programs varies depending upon the needs of the service territory and from utility to utility. Funding levels are sometimes negotiated as part of disposition of rate cases or other dockets, such as merger applications.
	Emergency Assistance	Customer Assistance and Referral Evaluation Services (CARES)	CAP Programs must be cost-effective, but there is no specific formula for establishing the budget level for the CAP programs. The budgets are determined on a case by case basis by the PA PUC. The utilities presents a proposed budget in its three-year Universal Service and Energy Conservation Plan. In that proceeding, the utilities will present a Needs Assessment based on the company's current CAP enrollment levels and the U.S. Census results in the service territory. In the filing, the utility will make a proposal about how much to ramp up the program each year, and the parties will evaluate the proposal and may make recommendations in the case. The size and costs of the programs varies depending upon the needs of the service territory and from utility to utility. Funding levels are sometimes negotiated as part of disposition of rate cases or other dockets, such as merger applications.
Pennsylvania, PPL	Rate Assistance	PPL Electric Utilities On Track	The Company has proposed CAP expenditure funding of approximately $56.6 million in 2014, $62.8 million in 2015, and $65.4 million in 2016.
Seattle, Washington	Rate Assistance	Seattle Utility Discount Program	Utility's rates are set every 2 years by mayor and city council.
United Kingdom	Rate Assistance (1)	Warm Home Discount scheme	The Warm Home Discount Scheme that came into effect on April 1, 2011 provides £1.13b to fuel poor customers over the four years until 2015.
	Rate Assistance (2)	Winter Fuel Payments	Mandated by law.
	Rate Assistance (3)	Cold Weather Payments	Mandated by law.
US Federal (LIHEAP)	Cash Grant	Low Income Home Energy Assistance Program (LIHEAP)	Congress authorizes and appropriates funds in each year, based on its conception of need, when seen in context of overall budget considerations. States may determine how to distribute the funds [e.g. a little to many households or a lot to fewer households]. The statute provides for two types of funding: regular funds (sometimes referred to as block grant funds) and emergency contingency funds. Regular funds are allocated to grantees based on a formula, while contingency funds may be released to one or more grantees at the discretion of the Secretary of the Department of Health and Human Services based on emergency need. Regular LIHEAP funds are allocated to the states according to a formula that has a long history, and is complicated. When Congress reauthorized LIHEAP in 1984 (P.L. 98-558), it changed the program's formula by requiring the use of more recent population and energy data and requiring that HHS consider both heating and cooling costs of low-income households (a change from the focus on the heating needs of all households). The effect of these changes meant that, in general, funds would be shifted from cold-weather states to warm-weather states. To prevent a dramatic shift of funds, Congress added two "hold-harmless" provisions to the formula. The result of these provisions is a three-tiered formula (sometimes referred to as the "new" formula), the application of which depends on the amount of regular funds that Congress appropriates.
	Emergency Assistance	LIHEAP Emergency Assistance	Same as LIHEAP.

Funding Dedicated to Program Administration

Jurisdiction	Program Type	Program Name	Funding Dedicated to Program Administration
Illinois	Rate Assistance	Percentage of Income Payment Plan (PIPP)	The amount of the SLEAF funds spent on administrative expenses in a year must not exceed 10 percent of the amount collected during that year. Illinois utilities were required to pay a one-time payment of $22 million with the passage of the IL EAA. These funds were used for the DCEO's cost of program implementation. It is not clear if administrative requirements are associated with the Energy Assistance Charge.
New York	Rate Assistance (1)	Low-Income Rate Assistance (in general)	Varies by utility.
	Rate Assistance (2)	ConEd's Low Income Program	See How Funding Levels are Established.
Pennsylvania	Discount, DSM, credit and collection rules	Customer Assistance Programs (CAPs) Discount	In 2011 and again in 2012, the utilities' weighted average spending on administration costs was 4% of overall costs.
	Emergency Assistance	Customer Assistance and Referral Evaluation Services (CARES)	In 2011 and again in 2012, the utilities' weighted average spending on administration costs was 4% of overall costs.
Pennsylvania, PPL	Rate Assistance	PPL Electric Utilities On Track	Most recent 3-Year Plan recites intention to bring collection functions in house to save money.
Seattle, Washington	Rate Assistance	Seattle Utility Discount Program	2014 budget - $8.1 million [including $87.85 per client for SPU admin].
United Kingdom	Rate Assistance (2)	Winter Fuel Payments	Department for Work and Pensions (DWP), possibly others
	Rate Assistance (3)	Cold Weather Payments	Department for Work and Pensions (DWP), possibly others
US Federal (LIHEAP)	Cash Grant	Low Income Home Energy Assistance Program (LIHEAP)	State programs limited to 10%. Tribal programs limited to 15% depending on size.
	Emergency Assistance	LIHEAP Emergency Assistance	Same as LIHEAP.

Entity Receiving Administration Funding and Why

Jurisdiction	Program Type	Program Name	Entity Receiving Administration Funding and Why
Colorado	Rate Assistance - PIPP	Percentage of Income Payment Plans (PEAP)	Each of the five largest utility companies maintains departments dedicated to working with their low-income clients to ensure those households get the heating they need and can manage their bill payments.
Illinois	Rate Assistance	Percentage of Income Payment Plan (PIPP)	Funding is eventually transferred to the Department of Commerce and Economic Opportunity, but may be collected through utilities or through the State Treasury.
New York	Rate Assistance (1)	Low-Income Rate Assistance (in general)	Utilities plus any contract assistance (e.g. intake).
	Rate Assistance (2)	ConEd's Low Income Program	Con Ed staffing is part of O&M in base rates. Small payment for matching and opt-out letters is made to agencies.
Pennsylvania	Discount, DSM, credit and collection rules	Customer Assistance Programs (CAPs) Discount	Utilities receive administrative funding as they are the ones that implement the programs.
	Emergency Assistance	Customer Assistance and Referral Evaluation Services (CARES)	Utilities receive administrative funding as they are the ones that implement the programs.
Pennsylvania, PPL	Rate Assistance	PPL Electric Utilities On Track	Utility through Universal Service Charge; CBOs through contracts with utility.
Seattle, Washington	Rate Assistance	Seattle Utility Discount Program	Seattle City Light has 9 FTEs; Human Services Department has 13.5 FTEs for electricity and water/sewer MOA work combined. SCL and SDP split MOA admin costs 56/44 based on relative size of customer base.
US Federal (LIHEAP)	Cash Grant	Low Income Home Energy Assistance Program (LIHEAP)	State agency and program delivery entities [e.g. Community Action agencies.]. To cover administrative costs - note, states and other block grantees have considerable leeway in defining administrative costs.
	Emergency Assistance	LIHEAP Emergency Assistance	Same as LIHEAP.

Program Results / Impacts

Jurisdiction	Program Type	Program Name	Program Results/ Impacts
Australia, Federal	Rate Assistance	Energy concessions	Analysis by consulting firm hired by Energy Supply Association of Australia concludes that four potentially vulnerable customer groups are at risk of "falling through the cracks": Family Formation Group (e.g. young families with small children), single renters with low income, regional (non-urban) customers with low income not connected to the energy network (mostly delivered gas customers but also some master-metered electricity customers), and new home buyers with low after-housing-cost income).
	Emergency Assistance	Hardship assistance	Analysis by consulting firm hired by Energy Supply Association of Australia concludes that four potentially vulnerable customer groups are at risk of "falling through the cracks": Family Formation Group, single renters with low income, regional (non-urban) customers with low income not connected to the energy network (mostly delivered gas customers but also some master-metered electricity customers), and new home buyers with low after-housing-cost income).
Colorado	Rate Assistance - PIPP	Percentage of Income Payment Plans (PEAP)	8,500 households assisted.
	State Energy Assistance	Low Income Energy Assistance Program (LEAP)	90,000 households served in the 2013-2014 program year with an average benefit of $438.
Illinois	Rate Assistance	Percentage of Income Payment Plan (PIPP)	For FY 2012, the program enrolled over 37,000 households and spent $21.6 million for PIPP benefits and another $37.3 million for direct vendor payments to PIPP households. At the end of FY 2013, at least $35 million had been obligated on behalf of about 52,000 participants. From 2011 to 2012, there was a 6% decrease in residential electric terminations.
New York	Rate Assistance (1)	Low-Income Rate Assistance (in general)	As of mid-2013, the state's major electric and gas companies were providing about $112 million annually for low-income rate assistance programs that assisted over one million households.
	Rate Assistance (2)	ConEd's Low Income Program	In most recent year, 417,000 customers were enrolled.
Pennsylvania	Discount, DSM, credit and collection rules	Customer Assistance Programs (CAPs) Discount	Electric CAP spending for 2012 totaled $234.4 million and gas CAP spending was $105.3 million, with 309,570 customers enrolled in electric utility programs and 175,015 in gas utility programs. In 2011, electric CAPs spent $250 million and enrolled 306,213 households, and gas CAPs spent $151.7 million and enrolled 189,690. In 2012, 37% of electric arrearages (in dollars) were on an agreement plan.
	Emergency Assistance	Customer Assistance and Referral Evaluation Services (CARES)	Electric CAP spending for 2012 totaled $234.4 million and gas CAP spending was $105.3 million, with 309,570 customers enrolled in electric utility programs and 175,015 in gas utility programs. In 2011, electric CAPs spent $250 million and enrolled 306,213 households, and gas CAPs spent $151.7 million and enrolled 189,690. In 2012, 37% of electric arrearages (in dollars) were on an agreement plan.
Seattle, Washington	Rate Assistance	Seattle Utility Discount Program	2014 expected average benefit: $8.8 million/16,800 participants = $524
United Kingdom	Rate Assistance (1)	Warm Home Discount scheme	70% of Core group recipients are actually defined as fuel poor.
	Rate Assistance (2)	Winter Fuel Payments	41% of recipients actually do use the payment for energy when the benefit is earmarked as a transfer to assist with energy bills (compared to just 3% when it is marked as income alone). One major concern is that this measure fails to target vulnerable groups, as only 26% of recipients are fuel poor.
	Rate Assistance (3)	Cold Weather Payments	This policy targets low-income households quite effectively, as it is restricted only to customers receiving certain benefits. Many of these households are also likely to be vulnerable to rising energy bills. From a targeting perspective, this is viewed as a more precise measure than the Winter Fuel Payments However, it is difficult to predict the number of days of extreme weather on which payments must be made to vulnerable customers, and as such, budgeting can be difficult and imprecise.
US Federal (LIHEAP)	Cash Grant	Low Income Home Energy Assistance Program (LIHEAP)	"The historic funding low was in 1996 with just $900 million in regular funds, supplemented by $480 million in emergency funds. The historic high was 2009, when the program received $5.1 billion. Similarly, the number of households served has varied from a low of about 3.6 million in 1999 to a high of 9.5 million in 2011." LIHEAP 101, at 5. The National Energy Assistance Directors' Association (NEADA) representing the state directors of the LIHEAP programs reported that the FY 2013 Congressional budget cuts kept 300,000 families from receiving heating or cooling assistance. NEADA Press Release November 14, 2104. The cuts reduced total funding by about $155 million [from $3.47 billion to $3.32 billion]. As a direct result of that first round of budget cuts, the total number of households receiving home heating assistance declined by 194,000 from 6.9 million in FY 2012 to about 6.7 million in FY 2013 and those receiving cooling assistance declined by about 104,000 from 1.1 million to about 996,000. As a result of budget cuts in recent years the total number of households receiving assistance declined by 17% from about 8.1 million in FY 2010 to 6.7 million in FY 2013. Cuts enacted since FY 2010 have reduced the program's purchasing power from 52.5% of the cost of home heating for the average household to 44% during the 2012-2013 winter heating season. Higher fuel costs and further budget cuts were forecast to drop the purchasing power to 41% of home heating during the 2013-2014 heating season.
	Emergency Assistance	LIHEAP Emergency Assistance	Since 1984, LIHEAP Emergency Funds have been released to grantees nearly two dozen times for reasons such as energy price increases, extremely hot or cold weather, and damages caused by natural disasters. LIHEAP 101, at 4. "It is important to note that, historically, LIHEAP has served less than 20 percent of eligible households... The 2009 Home Energy Notebook, the latest for which official data have been compiled, says that the average has remained fairly steady at around 17 percent since 1997." LIHEAP 101 at 5.

Other Information

Jurisdiction	Program Type	Program Name	Other Information
Australia, Federal	Other (2)	Household Assistance Package	Australian Government has proposed welfare changes to make it harder to receive aide if able to work.
Australia, Victoria	Other State-specific (1)	Service-to-property-charge concession	Operates like the waiver of a customer charge. Greater percent discount thus to lower use customers.
California	Rate Design (1)	Medical Baseline	Inverted block rates under consideration by Commission - Assigned Commissioner has proposed moving to TOU rates, which would make baseline rates inapplicable. Consumer groups are fighting the proposed change. Recent statute continues bar on requiring residential TOU rates before 2018.
Colorado	State Energy Assistance	Low Income Energy Assistance Program (LEAP)	Commission on Low Income Energy Assistance coordinates state-funded efforts. The state and EOC maintain an 800 number, run by a contractor, to provide centralized information and referrals to those seeking help with energy costs.
Pennsylvania	Discount, DSM, credit and collection rules	Customer Assistance Programs (CAPs) Discount	From 2011 to 2012, there was a 6% decrease in residential electric terminations.
	Emergency Assistance	Customer Assistance and Referral Evaluation Services (CARES)	From 2011 to 2012, there was a 6% decrease in residential electric terminations.
Pennsylvania, PPL	Rate Assistance	PPL Electric Utilities On Track	In 2012, for example, CSRs made nearly 120,000 referrals to OnTrack administering organizations prompted by information provided by customers apply in person.
Seattle, Washington	Rate Assistance	Seattle Utility Discount Program	In 2014, mayor and city utilities began a multi-year effort to raise participation.

APPENDIX C: COMMON CHARACTERISTICS OF LONG-TERM AFFORDABILITY PROGRAMS

Table C: Common Characteristics of Long-term Affordability Programs in the Unites States, Australia, and the United Kingdom

	Jurisdiction		AU	CA	CO	ME	MD	MA	NJ	NV	NY	PA	OH	OR	WA	WI	UK
Overview	**Reason/Mechanism for Establishing Program**	Required by statute	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	No	Yes	Yes	Yes	Yes	No	Yes
		Programs before restructuring/statute	Yes	Yes	No	Yes	?	Yes	?	?	Yes	No	Yes	n/a	n/a	n/a	Yes
Design & Administration	**Utility and/or Program Administrator**	All in state vs. by utility	All	All	By utility	All	All	All	All	All	All	All	By utility	By utility	All	All	All
		Availability of utility by utility details	No	Yes	No	?	?	No	No	?	Yes	Yes	Yes	Yes	Yes	?	No
	Intake process	Intake administrator (1)	Utility & Gov	Utility & CBOs	Utility	CBOs	CBOs	Utility & CBOs	CBOs	CBOs	Utility	Utility & CBOs	CBOs	Utility	Utility	Utility	Utility
	Program Design	Uniform Design (2)	Both	Yes	No	No	Yes	Yes	Yes	Yes	Yes	Yes	Yes	No	No	Yes	Yes
		Burden Based	No	No	Yes	Mixed	Yes	No	Yes	Yes	No	Yes	Yes	No	No	No	Yes
Funding	**Funding Source**	Cost recovery	Taxes	Rates	Mixed	Rates	SBC	SBC	SBC	SBC	Rates	Rates	Rates	Rates	Rates	Mixed	Taxes
		Customer classes	n/a	All	Res.	Retail	All	All	All	Retail	All	Mixed	All	Res.	Res.	All	n/a
		Administrator	Govt	PUC	Utility	PUC	DOER	PUC	PUC	PUC	PUC	PUC	PUC	Utility	LIHEAP	PUC	Govt
	How Funding Levels are Established	Open-ended funding (3)	No	Yes	Mixed	Varies	Set	Yes	Varies	Set	Set	Yes	Varies	Set	Set	Varies	No
Other	**Program Results/ Impacts**	Low, medium or high benefit	?	High	?	?	Medium	High	High	?	Low	High	High	?	?	?	?

Sources:
Adapted from chart "Legal and Regulatory Framework for Low Income Programs," in APPRISE, p. 56.

Notes:
1) CBOs are community based organizations; in most cases this is the same entity that takes federal LIHEAP applications; can be governments.
2) Uniform design refers to the high level characterization (i.e., PIPP, flat annual grant, % off monthly bill, etc.).
3) Where funding is open-ended, there is no limit on participation, but the PUC can adjust the program funding up or down over time.