



Low Income Utility Program Working Group Report

December 2018

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Introduction

Energy is considered an essential service in Oregon - meaning that all citizens should have access to safe, affordable, and reliable energy. A loss of energy service can significantly impact the health and safety of Oregonians. Far too many Oregonians have an energy burden that is too high to sustain utility payments while managing other household expenses and in some cases, Oregonians will forego other financial responsibilities in order to provide for their energy needs.

Low-income¹ Oregonians are disproportionately impacted by the effects of climate change and pay a larger portion of their income in energy costs. Oregon currently has programs designed to mitigate the impact of energy burden² on low-income Oregonians through energy assistance and weatherization programs. However, gaps exist in available funding and there is a lack of data on whether funding is available proportionately to all low-income Oregonians, including senior citizens, people with disabilities, and those connected with communities of color, and rural areas. Further, there is a lack of programs specifically designed to engage low-income communities, communities of color, tribes, and rural communities in the clean energy transition, including programs designed to enable access to new technologies.

Oregon's [Built Environment Energy Working Group](#) projects that there is a gap of more than \$345 million³ between what is considered to be an affordable percentage of household income to spend on energy services and what low-income customers spend as a percentage of their income. Energy programs can address only part of the energy burden equation related to energy expenses; other workforce development and poverty reduction programs address the income part of the equation. Current energy programs are estimated to meet a relatively small portion of the overall need in Oregon, though as described below a number of data gaps hinder more specific quantitative conclusions. Present energy assistance programs total \$61 million while weatherization programs have \$34 million available in funding.

¹ Low-income is defined a number of ways nationally and statewide. Some common ways to define low-income are: 100 percent of the federal poverty level which is \$25,100 for a family of four; and 50 percent of area median income which for a family of four in Portland would be \$40,700.

² Energy burden can be measured a variety of ways, but generally refers to the percentage of household income spent on energy-related expenditures. The federal government defines energy burden as paying greater than six percent of household income in energy costs (severe energy burden equates to paying more than 10 percent). Using Fisher, Sheehan and Colton (2017) energy burden calculations, total energy affordability gap of low-income households (less than 200 percent of the federal poverty level) represents a dollar amount needed to bring energy burdened households to the "affordable" (six percent or less) level of energy burden. Fisher, Sheehan and Colton (2017) *Home Energy Affordability Gap*, <http://www.homeenergyaffordabilitygap.com/>. This definition of energy burden does not include energy costs such as those related to transportation and is limited to natural gas and electricity costs.

³ The \$345 million reflects the amount above six percent which low-income Oregon households pay for energy services on an annual basis.

In May 2018, the Governor convened a collection of non-profits, electric and natural gas utilities, local jurisdictions, and legislators to review available energy assistance, efficiency and weatherization programs for low-income and historically underserved communities. She requested the group make recommendations to ensure that all customers have access to affordable and reliable energy services. This report outlines the Low Income Utility Program Working Group's recommendations for addressing some of the most pressing energy burden needs and develop a strategy to move the state forward.

The Low-Income Utility Program Working Group found that there are actions that can be taken now to reduce energy burden, decrease greenhouse gas emissions, and increase the health outcomes for low-income Oregonians. The working group also found that there is a need to develop a continuing and meaningfully inclusive strategy for addressing these concerns over the long-term. During the review of the weatherization and energy assistance programs it became clear that many communities are helping their neighbors through voluntary assistance programs and rate-based programs through the energy utilities. It is also clear that the need is far greater than the current available funding, but opportunities exist to increase information sharing between programs, and better align existing programs. Opportunities also exist to provide additional energy assistance and weatherization funding. This additional funding should have a goal of meeting all identified need which is feasibly met.

The Low-Income Utility Program Working Group makes the following recommendations:

- I. Give utilities the authority to create low-income programs and require annual reporting on data and metrics.
- II. Ensure low and moderate income customers, especially seniors, people with disabilities and environmental justice and rural communities,⁴ are resourced to participate in the clean energy transition, including allocating funding which may be available under a Cap and Invest program to mitigate the impacts of climate change on low-income customers, reduce energy burden, and decrease carbon emissions.
- III. Make permanent an Energy Burden and Poverty Task Force to formalize and continue to further the development of innovative approaches to meeting the energy burden and reducing the greenhouse gas footprint of low-income Oregonians.
- IV. Implement new programs, enhance existing program designs, and diversify funding sources to reach greater numbers of low and moderate income Oregonians.

⁴ The Oregon Environmental Justice Task Force has defined environmental justice as equal protection from environmental and health hazards, and meaningful public participation in decisions that affect the environment in which people live, work, learn, practice spirituality, and play. Environmental justice communities include minority, low-income, tribal, and underrepresented communities such as youth, elderly, or disabled. These definitions comes from the State of Oregon's Environmental Justice Task Force: Best Practices for Oregon's Natural Resource Agencies. For more information: https://www.oregon.gov/gov/policy/environment/environmental_justice/Documents/2016%20Oregon%20EJTF%20Handbook%20Final.pdf

Oregon's Built Environment Energy Working Group projects that there is a gap of more than \$345 million between what is considered to be an affordable percentage of household income to spend on energy services and what low-income customers spend as a percentage of their income.

Working Group Background and Process

In May 2018, the Governor convened a collection of non-profits, electric and natural gas utilities, local jurisdictions, and legislators to review available energy assistance, efficiency, and weatherization programs for low-income and historically underserved communities to ensure that all customers have access to affordable and reliable energy services.⁵ This collection of organizations formed the Low-Income Utility Program Working Group and was staffed by the Department of Housing and Community Services, the Public Utility Commission, and the Department of Energy.

It is worth noting that, despite outreach, there was little to no representation of low-income and other environmental justice communities in the Low-Income Utility Program Working Group and the lens of analysis was largely that of entities that deliver programs and traditional energy advocates. Missing from the conversation was the direct experience of participants in low-income energy programs.

Specifically, the Governor requested that the working group:

- 1.) Review and evaluate the status of existing programs, services provided, and communities served.*
- 2.) Identify needs and opportunities for new programming, or changes and expansion of existing programming as Oregon transitions to clean energy.*

The working group was asked to present its findings and recommendations to the Carbon Policy Office no later than December 2018.

Since May, the working group met seven times to review the existing programs and their structure to

⁵ A list of organizations and individuals which participated in work group meetings is available in Appendix A.

develop recommendations for programmatic changes. These meetings focused on the following topics:

- **July 19:** Housing and Community Services provided an overview of existing programs in the state, both those managed by the state government and those that are managed by electric and natural gas utilities. An inventory of those programs is available at: <https://www.oregon.gov/puc/utilities/Documents/LIUPWG-OR-LowIncomePrograms.pdf>
- **August 21:** Housing and Community Services gave an overview of Housing and Community Services Low-Income Energy Service Programs.
- **September 18:** Several of the state's utilities and program implementers provided overviews of their bill assistance and weatherization programs. This included how programmatic funds from several sources, such as ratepayer and federal dollars, work together.
- **October 17:** Housing and Community Services gave an overview of energy program demographics and presented a program gaps analysis. There were two presentations on materials of what other states do to mitigate energy burden.
- **November 19 and 27:** the workgroup developed a problem statement and a broad list of recommendations for consideration by the Carbon Policy Office and the Governor.
- **December 10:** the workgroup finalized its recommendations to the Carbon Policy Office and Governor, and worked toward finalizing this report.

Below we discuss some of the program information, data, and statistics reviewed in making our recommendations.

Landscape and Background

In making our assessment and recommendations, the working group reviewed the available programs in the state, sources of funding, and projected need of low-income Oregonians. We summarize the available data here, but note that a more sophisticated and representational analysis is needed to understand the existing gap between funding and need; and whether funds are proportionately and equitably distributed within communities. Below we outline the existing programs in the state and their available resources and data on the funding gap. One thing which is not considered below as part of the programs is the overall affordability of energy costs. Energy affordability should be considered as part of future discussions.

Programs Designed to Reduce Energy Burden and Funding Sources

Current programs in Oregon aimed at reducing energy burden in low-income households focus on two primary areas: (1) energy assistance and (2) weatherization. These programs vary across utilities in the state.

Energy Assistance

Energy assistance reduces energy burden by providing subsidies to assist low-income households in paying utility bills. The source of these subsidies are typically state, federal, and utility ratepayer

dollars. One of the main advantages of energy assistance is that it can provide immediate, emergency assistance to low-income households, prioritizing those in danger of disconnection.

The two largest programs in the state are administered by Housing and Community Services. The first is the federally funded Low-Income Home Energy Assistance Program (LIHEAP). This program provides resources statewide. The state was allocated \$27.5 million for bill payment assistance in federal fiscal year 2018. The second is the Oregon Energy Assistance Program (OEAP) with funding from the utility ratepayers of Portland General Electric and Pacific Power. This program collects approximately \$20 million annually for energy assistance for the ratepayers of these utilities. This funding cannot be used for other statewide utilities.

All of the state's consumer owned utilities have designed programs to provide energy assistance to their customers. Some of these programs are funded through ratepayer dollars, voluntary donations of customers and employees of the utilities, or a combination thereof. A number of the energy assistance programs target low-income seniors or the disabled, but the design is reflective of the needs identified in that utility's service territory. The total funding available through these programs is approximately \$3.7 million annually.

Some energy assistance programs are collaborations of utilities. For instance, Pacific Power, Portland General Electric, and West Oregon Electric partner with the Oregon Energy Fund to provide energy assistance through funds donated by employees and customers.

The state's three natural gas companies also offer energy assistance programs. These are the Oregon Low Income Gas Assistance (OLGA) for customers of Northwest Natural which provides approximately \$3 million annually, Oregon Low Income Bill Assistance (OLIBA) for Cascade Natural customers which provides around \$43,000 annually, and Low Income Rate Assistance Program (LIRAP) for Avista customers which provides \$224,000 annually. Funding for these programs comes from utility ratepayer dollars.

Detailed information on these energy assistance programs can be found at:

<https://www.oregon.gov/puc/utilities/Documents/LIUPWG-OR-LowIncomePrograms.pdf> as part of a statewide inventory of low-income programs developed by Housing and Community Services.

Low-Income Weatherization

Current weatherization services in the state include conservation services, household health and safety repairs, heating equipment repair/replacement, and energy education. All of these services assist in addressing physical safety of living arrangements, reducing energy spending and providing healthy living environments for residents. The services are provided at no cost to income-qualified individuals.

Housing and Community Services administers Oregon's Low-Income Weatherization Assistance Program consisting of five distinct programs and funding sources. The first is the U.S. Department of Energy funded Weatherization Assistance Program (WAP) and funding from this program is available statewide. However, in order to utilize funding certain conditions must be met, and some protocols are more stringent than ratepayer funded programs. Oregon is allocated around \$2.3 million annually.

Second, is the federally funded Low-Income Home Energy Assistance Program (LIHEAP) from the U.S. Department of Health and Human Services. These funds are available statewide. In federal fiscal year 2018, Oregon was allotted just over \$5 million.

The third is the Bonneville Power Administration Low Income Energy Efficiency Grant Program. These funds are available only to customers of the state's consumer owned electric utilities and are sourced from the utility ratepayers of those utilities. In 2018, these funds were projected to be \$1.56 million in Oregon.

The fourth is the Energy Conservation Helping Oregonians (ECHO). This program is funded through utility ratepayer dollars from Portland General Electric and Pacific Power customers. Funds are only available in those utilities' service territories for energy efficiency upgrades for those utility's electric customers. Combined these programs contribute approximately \$14.7 million to weatherization in the state annually.

The fifth is the Oregon Multifamily Energy Program (OR-MEP) which is also funded through utility ratepayer dollars from customers of Portland General Electric and Pacific Power. This program specifically targets multi-family dwellings. The combined contribution from utility ratepayers is \$1.5 million annually.

Other existing weatherization programs in the state are utility based programs for both electric and natural gas utility customers, including Oregon Low-Income Energy Efficiency (OLIEE) for Northwest Natural customers which accounts for approximately \$2.8 million, Oregon Low Income Energy Conservation (OLIEC) for Cascade Natural customers which collects approximately \$300,000, and Oregon Low-Income Energy Efficiency Program (AOLIEE) for Avista customers which collects

\$660,000. In addition to the Bonneville Power Administration Low Income Energy Efficiency Grant Program, which is funded by consumer-owned utility ratepayers, eight consumer-owned utilities have supplemental weatherization programs that total \$1.8 million.

Detailed information on these weatherization programs can be found at:

<https://www.oregon.gov/puc/utilities/Documents/LIUPWG-OR-LowIncomePrograms.pdf> as part of a statewide inventory of low-income programs developed by Housing and Community Services.

Funding Sources

The source of the funding can determine who is eligible to participate in a program. As demonstrated above, not all low-income Oregonians have access to the same level of funding or the same programs. Primarily, there are three sources of funding currently utilized in the state:

- **Federally funded programs:** These programs primarily fund local community action agencies for implementation using federal dollars. The state tracks and maintains records about these programs. These programs are the largest source of low-income energy burden assistance in the state.
- **Utility ratepayer funded programs:** These programs are funded by energy utility ratepayers and can be implemented by the utility, a local community action agency, or a non-profit. There is no consolidated or consistent mechanism for the state to track data about these programs. Information provided to this workgroup suggests that these programs are the second largest source of low-income energy burden assistance in the state.
- **Private or charitable programs:** These programs are generally implemented by non-profit organizations with varied sources of private funding. There is no consolidated or consistent mechanism for the state to track data about these programs. Anecdotal evidence reviewed in the working group suggests that these programs are generally very targeted to specific populations or locations and do not have a broad reach.

Additional approaches to addressing energy burden

Other existing programs also reduce energy burden. However, these programs have not been specifically designed to reduce energy burden or targeted to low-income households, but rather are available to all Oregonians regardless of income.

Energy efficiency programs, directed to ratepayers of all utilities regardless of income, reduces energy burden by reducing the amount of energy required to provide the same level of energy services (e.g., heating) to the home, thereby reducing the household's energy bills. One of the main advantages of energy efficiency as a mechanism to reduce energy burden is that it results in persistent savings, which in turn produces a persistent reduction in energy burden. It does this while also providing non-energy benefits to the household, such as improved health, comfort and safety. It increases the household's resiliency to fluctuations in utility costs. Energy efficiency can also reduce habitability issues in the unit and enhances long-term housing stability. At the same time, energy efficiency results

in reduced greenhouse gas emissions and increased health outcomes at a societal level. Access to traditional energy efficiency incentives requires a personal financial investment in the associated energy efficiency measure. That investment can be beyond the reach of low-income families and individuals. For income-qualified households, receiving low-income weatherization services requires no capital outlay and may be the most accessible way for qualifying households to access the benefits of energy efficiency.

Developing access to on-site **renewable energy** at reasonable cost for low-income households reduces energy burden by reducing the amount of energy the household must buy from the electric system. Like energy efficiency, renewable energy's advantages include persistent savings to the household and the societal benefit of greenhouse gas emission reduction. Depending on the technology and integration with energy storage, it also potentially has the added benefit of increasing the resiliency of the residence. However, renewable energy, such as solar, can be more expensive than cost-effective energy efficiency and with upfront costs, can prove a more expensive investment than utilizing utility system energy. As such, it is generally accepted prior to installing renewable energy systems, the energy consumption of a dwelling should first be reduced with cost-effective energy efficiency measures. However, with the decrease in the price of on-site renewable energy, it could play a more predominate role in reducing the energy cost for low-income households.

Supporting access to energy and bill credits from **shared or community renewables** is an emerging approach to mitigate energy costs. The City of Ashland was the first Oregon utility to develop a community solar project in the year 2000, offering their customers in the option of signing up for a portion of their energy from a solar project at a premium rate. In 2019, investor-owned utilities will be starting up programs that allow customers to share in the costs and benefits of community solar projects, as part of the implementation of SB 1547 (2016). In these programs, participating customers will receive a bill credit for their portion of the energy output of a community solar project, which can be located anywhere in the utility's service territory. As part of the legislation and program rules, there is a requirement that 10 percent of the capacity of the program is allocated to serve low income customers.

The Need and the Gap

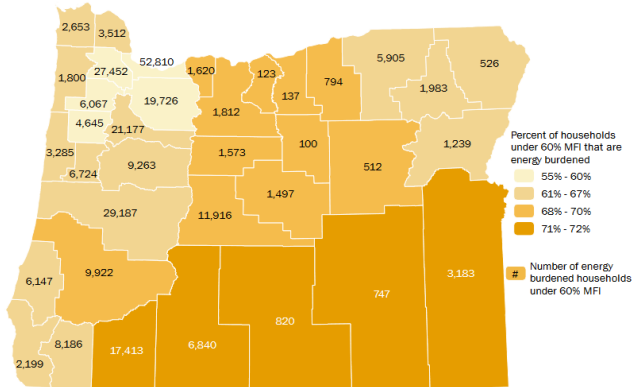
The working group reviewed available program data including information on the current funding level of energy assistance and weatherization programs, locations where weatherization projects have

occurred, and information about the energy burden in the state.⁶ Below we present a picture of what we understand the energy burden need is in Oregon, gaps in currently available funding, and share of households being served by available funding. However, we do so with the knowledge that there are significant gaps in the data that is available and barriers to developing a statewide picture. We present these gaps and barriers below and make recommendations for solutions as part of our next steps.

Energy Burden and Households Served

Sixteen and a half percent of Oregonians are living with household incomes below the poverty threshold.⁷ In 2015, there were approximately 637,000 Oregonians living below the poverty line. Using the federal definition of low-income and energy burden, Oregon's 2017 energy affordability gap amounts to \$345,733,243. This is the amount above six percent of income which low-income Oregon households pay for energy services on an annual basis even after low-income assistance has been delivered. The figure below illustrates how energy burden varies throughout Oregon.

Share of Energy Burden of Households Below 60% MFI



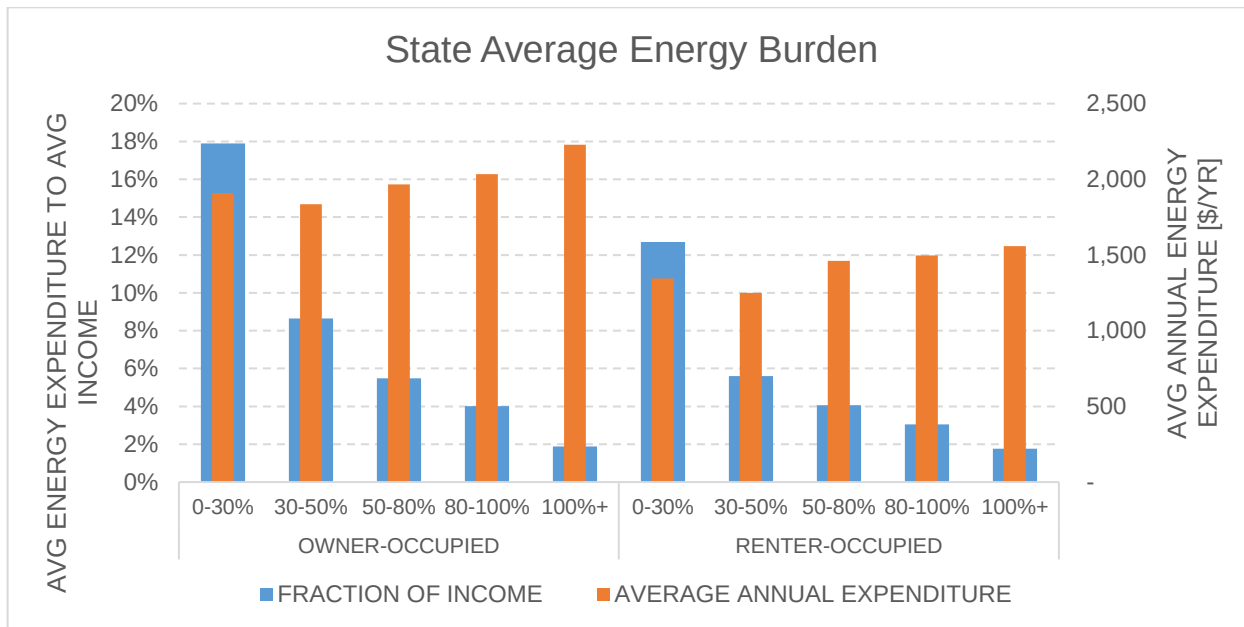


Table 1: State average energy burden and energy expenditure distribution across different household income levels in Oregon⁹

Additionally, the poverty rate in Oregon varies significantly between utility service territories, from 9.5 to 20.1 percent. Likewise, the percentage of eligible households served by LIHEAP and OEAP ranges from 0.05 percent to greater than 60 percent.¹⁰

Barriers and Information Gaps

Currently, there is no mechanism by which statewide data can be reported to ensure no double counting of households. Housing and Community Services can only collect data from the LIHEAP and OEAP programs. There is no mechanism for Housing and Community Services to collect household specific data from the utility ratepayer programs beyond OEAP, or from charitable and private organizations. This means when trying to assess unserved households, there could be double counting between programs where each program counts the same household as being served separately. This highlights two important information and data reporting gaps: (1) the state cannot comprehensively track which households are being served by which programs, and (2) the state cannot comprehensively assess the extent to which the assistance provided to low-income households addresses their energy burden.

⁹ DOE Low-Income Energy Affordability Data (LEAD) Tool, County Pacific 2015 dataset (Link: <https://openei.org/doe-opendata/dataset/celica-data>). Household numbers and percentages in the LEAD dataset are based on ACS 2011-2015 5-year estimates.

¹⁰ These numbers only represent the non-duplicated funding from LIHEAP and the OEAP, and does not account for households that are served with other funding sources like individual utility or non-profit programs. With the addition of individual utility programs and other funding sources this range may fluctuate. We offer this as a range of households serviced across the state.

To fully understand how many households in need are being served by existing energy assistance and weatherization programs, there is a need to address gaps in existing data, address varying definitions of low-income, and develop consistent reporting across federally and ratepayer funded programs. There is also an inherent difficulty in determining the exact number of households that require energy efficiency upgrades. Identifying low-income households in the state is not difficult. Knowing the building conditions of every low-income household is more difficult to gather data on. The programs assess qualification of need based primarily upon household income, but may also consider the condition of the building. While a program participant may be income eligible for the program, the buildings that they inhabit may not require weatherization or may not be eligible for weatherization if there are other structural or maintenance issues that prevent it. Housing is a static component in this case. In addition, when people move out of a building, the same building that qualified by income one year may not qualify the next.

Due to the long-term energy savings that are a result of weatherization, as part of our analysis we understand that current weatherization funding is fully not accounted for in bridging the energy affordability gap. That means, while we know there is approximately \$34 million per year available for weatherization programs in the state, the value in energy savings of those investments is not currently quantified on a statewide basis. There may be a discrepancy in the number of households qualifying for energy assistance and weatherization programs and the number of households that are being considered in measuring the energy affordability gap due to different income eligibility guidelines. Current energy affordability gap data includes low-income households' with less than 200 percent federal poverty level in the calculation of energy gap, a population definition which is not always consistent with energy assistance programs' eligibility thresholds. Energy assistance programs consider low-income as those households earning less than 60 percent area median income. There is a need for a more consistent measurement.

Additionally, the available data only provides a broad picture of energy burden and available programs, and while Housing and Community Services does report demographic data for weatherization and energy assistance programs, a full complete picture of need and access is not understood for communities of color, tribal communities, or other environmental justice communities.

National Context and Exploration of Other State's Policies

As part of the process, the workgroup received information from participants on key elements of other state's mechanisms to support low income customers and mitigate energy burden. A number of states have taken steps to implement rate discounts, incentive programs for renewables and efficiency, and direct funding mechanisms to reduce the energy costs for low income customers. A summary of some

of these programs is provided in Appendix B. As these efforts continue, there is opportunity for further learning from the best practices of other states' approaches.

Working Group Observations

The working group recommendations are described in detail within this report to the Carbon Policy Office, and, the working group would like to highlight some high level observations reviewed in developing these conclusions:

- Weatherization and energy efficiency play an important role in reducing greenhouse gas emissions and reducing energy bills, and they also support positive health outcomes for vulnerable populations.
- No general funds dollars are currently utilized to provide low-income weatherization or energy assistance programs. Ratepayer and federal funds are the primary source of energy assistance in the state, which means the availability of funding differs according to which utility serves a given low-income customer. Only the federal funds provide a fuel-blind, all territory program response to the statewide need.
- Every utility in the state provides some form of energy assistance to its customers. For the consumer owned utility, these programs have been designed by the individual utilities and funding varies based on the assessment and decisions of the local governing board.
- Energy assistance and weatherization programs vary geographically and availability depends on where you live.

Working Group Findings

The working group has developed the following four recommended actions for consideration by the Carbon Policy Office, the Governor, and the Legislature. These are described below, along with recommendations for how those actions should be carried out. We provide a summary of the recommendations in Appendix C.

Recommendation 1

Give utilities the authority to create low-income programs and require annual reporting on data and metrics.

Consumer-owned and investor-owned utilities have varying authority when it comes to developing low-income programs. We recommend that the state clarify that all utilities have the ability to develop low-income programs for their customers while considering the cost-shifting that may occur to other customers, specifically moderate-income customers who may not qualify to enroll. In addition, the low-income programs must be designed in a way that encourages energy conservation. With the investor-

owned utilities this would require giving additional authority to the Public Utility Commission to approve programs, set rates, or provide a discount based on income. In establishing the authority to approve programs, set rates, or provide a discount based on income, the legislature should ensure provided funding is non-bypassable, meaning that all energy customers contribute to funding these bill assistance program regardless of whether they receive their service from a utility or an electricity service supplier. This action would only apply to investor-owned utilities. In our program review, the working group found that consumer-owned utilities already have the ability to design programs for low-income customers.

Additionally, the working group recommends that all utilities in the state be required to devise and implement a method of reporting to Housing and Community Services information on the number of disconnects and related metrics that can indicate trends in utility service to vulnerable customers.

We also recommend that Housing and Community Services annually collect data on energy burden including its intersections with demographic data such as race, age, and disability. Housing and Community Services should also work with the interagency Built Environment Energy Working Group to complete a biennial equity and access analysis. This data will help the state develop a better understanding of energy burden trends and help state agencies better design programs to reach communities which may be disproportionately impacted by energy burden.

Action required: These recommendations will require legislative action to amend the Public Utility Commission's authority to allow it to approve programs, set rates, or provide a discount based on income for low-income customers while considering cost-shifting to other customers. Also, require Housing and Community Services and the Department of Energy¹¹ to collect data from utilities and produce a biennial statewide energy burden report. This would include Housing and Community Services and consumer-owned utilities developing a method of reporting to ensure consistent statewide reporting of data and metrics.

Recommendation 2

Ensure low- and moderate-income customers, especially seniors, people with disabilities, and environmental justice and rural communities, are resourced to participate in the clean energy transition, including allocating funding which may be

¹¹ Recommendations related to the Department of Energy could also apply to its proposed successor, the Climate Authority, as outlined in the Governor's 2019-2021 Budget: https://www.oregon.gov/das/Financial/Documents/2019-21_gb.pdf.

available under a Cap and Invest program to mitigate the impacts of climate change on low-income customers.

As we have identified, climate change will have a disproportionate impact on low-income customers especially seniors, people with disabilities, and those environmental justice and rural communities. However, there are ways to mitigate these impacts while further reducing energy burden. We can enable communities to participate in the clean energy transition by allocating funds for the development of tools and incentives for customers from funding which may be available under a Cap and Invest program.

Mitigation measures can include increased funding for weatherization, energy assistance programs (including rate design based solutions), and low-income participation in conservation programs that further reduce the out-of-pocket cost for efficiency measures. Incentive programs can include funding for low-income communities to develop renewable energy resources, such as community solar, which would further reduce emissions or invest in resiliency measures which would reduce the impact of climate change on distinct communities. Incentive measures can also be based on the carbon-intensity of energy fuels used in heating and lighting the home. For instance, a resident would receive a greater incentive for switching to a lower-carbon source of energy, which would further reduce greenhouse gas emissions.

Action required: Include statutory authority and funding through the Cap and Invest bill for the Public Utility Commission, Housing and Community Services, and/or the Department of Energy to develop programs which encourage low- and moderate-income Oregonian's participation in the clean energy transition. These programs can focus on energy efficiency, resiliency, and renewable energy, and may be targeted to support specific low-income and environmental justice communities.

Recommendation 3

Make permanent an Energy Burden and Poverty Task Force to formalize and continue to further the development of innovative approaches to meeting the energy burden and reducing the greenhouse gas footprint of low-income Oregonians.

The working group recommends that the Governor's Office convene and require annual reporting from an Energy Burden and Poverty Task Force (Task Force). Given the limited time of this working group,

we suggest the task force would continue the work of this group. The Task Force would be responsible for developing a statewide strategy to address energy burden and assessing barriers to accessing current programs.

This strategy would encompass both consumer- and investor-owned utilities as well as statewide programs. The Task Force should pay careful attention to the regional and demographic differences in energy burden when developing the statewide strategy. The development of this statewide strategy should include examination of the unique utility approaches to programmatic development for low-income programs and recommend possible policy and programmatic changes that seek to promote best practices.

As part of developing this strategy, the Task Force should explore providing assistance to all low-income Oregonians. The Task Force would be required to assess the statewide financial impact of such a program including the economic benefits of the reduction in energy burden, impact on poverty measures, increased outcomes in other arenas, including health, and potential financial benefits of those increased outcomes to other general funded programs. The Task Force should ensure equitable and just program access is a core design element of the program. The Task Force should also explore funding mechanisms that ensure that sufficient resources are available to serve every low income household experiencing energy burden, rather than a prescribed or fixed funding amount. Currently, resource constraints require many low income energy assistance and weatherization providers to limit their service based on resources available rather than based on the needs of their community, and consequently are unable to serve many households in need.

As part of the statewide strategy, special consideration should be given to developing programs to address renters, and multifamily dwellings. The Task Force should consider strategies that would help mitigate the split-incentive¹² that exists between tenants and landlords.

Additionally, the Task Force should continue to explore and address the structural barriers to low income households accessing energy programs. The working group recognizes that these barriers can include information barriers such as how outreach and education is completed, the burden of providing income verification for multiple low income programs, and how communities are included in program design. The Task Force presents an opportunity to consider prequalifying participation across low income programs such as LIHEAP, the Supplemental Nutrition Assistance Program and the

¹² The split-incentive commonly refers to “a circumstance in which the flow of investments and benefits are not properly rationed among the parties to a transaction, impairing investment decisions.” This definition is from the California Sustainability Alliance (2011): http://sustainca.org/green_leases_toolkit/glossary. In residential energy efficiency this refers to the incentive of renters to save on monthly energy costs and would benefit from energy efficiency measures. At the same time, landlords do not have the incentive to pay for energy efficiency measures to a dwelling when tenants are responsible for monthly energy costs.

Oregon Health Plan, through meaningful engagement with low income households who participate in these programs.

Further, the working group recognizes the role that rate design can have to incentivize consumers of energy to make choices to conserve energy. The more closely energy prices are related to consumption, the stronger the consumption price signal customers receive. Rate design also has impacts on low-income customers and bill affordability. The Task Force should examine the link between rate design, low-income households and energy conservation. In the meantime, the working group encourages the state's utilities to continue their work around conservation.

Action required: The Governor should convene the Energy Burden and Poverty Task Force.

This on-going Task Force should report its findings to the Governor within two years of its conception, which will ensure action items are recommended in a short timeframe. The Task Force should report to the Governor's office every two years thereafter on progress on the statewide strategy to address energy burden in Oregon. This Task Force should be managed by the Governor's Office, but should receive assistance from all relevant state agencies including Housing and Community Services, the Department of Energy, and the Oregon Health Authority. Its governance structure should be modeled after the Environmental Justice Task Force, including an acting in an advisory role for Housing and Community Services, the Public Utility Commission, the Oregon Health Authority, the Department of Energy, and other relevant agencies. It should work in tandem with the Environmental Justice Task Force to ensure that programs to address energy burden are being developed in full consideration of environmental justice. The Task Force should meet regularly with the state's Community Action Agencies and conduct community-based research within communities that are energy burdened.

Recommendation 4

Implement new programs, enhance existing program designs, and diversify funding sources to reach greater numbers of low and moderate income Oregonians.

Earlier sections of this report have discussed the compelling need for more assistance to low- and moderate-income households to alleviate energy burden. There are actions that the state can take now to address these critical needs. First, there is a need for a state source of funding to augment the federal and utility resources available for these purposes. By leveraging different sources of funding more households can be served - which directly reduces the statewide needs.

Additionally, we recommend Housing and Community Services develop a protocol by which the state can leverage existing weatherization funding with monies for critical dwelling repairs and home health interventions. Housing and Community Services should also continue its exploration and deployment of the statewide Healthy Homes pilot and continue to look for opportunities to directly address energy efficiency in manufactured homes.

Additionally, there are opportunities for improvements to existing program structures. The working group understands from reviewing existing programs that there are opportunities for efficiencies across the utility-based programs and the statewide programs. For example, working group members highlighted opportunities to share data in order to cross-qualify customers for state and utility programs. This may require additional funding support for state programs to technologically enable this type of data sharing, , and requires careful consideration of the impact of how data is used and shared, which is of particular concern for communities of color, tribes, rural, and immigrant communities.

Beyond data sharing, the working group recognizes the role that technology can play in reducing a household's energy need, specifically access to broadband. The working group recommends that the state continue to increase its work to expand broadband access. Access to high-speed internet increases the ability of residents and community members to partake in conservation technologies. For example, to enroll in a smart thermostat demand response program, customers must have access to Wi-Fi in order for the thermostat to connect to a third-party. Demand response offers customers a way to manage both their energy consumption and bills, while reducing greenhouse gas emissions.

In tandem with this working group, Housing and Community Services is undergoing a program evaluation which is anticipated to be completed in 2019. The study objectives include: assessing the impact of current state energy assistance programs; evaluating the service reliability from state, local and utility perspectives; assessing the marketing, outreach and accessibility of the state programs; evaluating the effectiveness of unique and varying current delivery models/programs in Oregon; and maximizing statewide energy assistance benefits on an annual basis by increased participation with minimal disruption.

This working group recommends that based on the outcomes of this evaluation done by Housing and Community Services, programmatic adjustments be made to incorporate the recommendations of this evaluation. This working group also recommends that Housing and Community Services present these findings to the Energy Burden and Poverty Task Force (outlined in Recommendation 3).

Further, the working group recommends that program implementers, such as utilities and Community Action Partnership agencies, examine existing outreach methods to low-income communities. This review should analyze whether implementers are effectively reaching all populations, including those that may be considered hard to reach or have language barriers. This analysis should be reported to the Energy Burden and Poverty Task Force (outlined in Recommendation 3) and utilize the data and analysis collected during the development of the statewide Energy Burden Strategy.

Action Required: The state should create a new source of funding for low- and moderate-income weatherization and mechanisms to leverage existing weatherization funding with monies for critical dwelling repairs and in home health interventions. We also strongly encourage the development of a statewide program to address weatherization and energy efficiency in manufactured homes. This could include retirement of aging manufactured homes and could build on the pilot replacement program by Housing and Community Services, the Energy Trust of Oregon, CASA of Oregon, NeighborWorks Umpqua, St. Vincent de Paul of Lane County, and regional community action agencies.¹³

Additionally, as mentioned previously, in 2018-2019, Housing and Community Services, Community Action Partnership of Oregon the Oregon Public Utility Commission, NW Energy Coalition, the Oregon Citizens' Utility Board, Portland General Electric, Pacific Power, NW Natural and Cascade Natural are collaborating on a third-party evaluation of the statewide programs. This evaluation should be presented to the Energy Burden Task Force and used to make program improvement recommendations.

Consolidation of data and elements of low-income programs will require a large information technology infrastructure investment. Housing and Community Services does have a sufficient database platform for its programs but, the platform is antiquated and would need to be updated to reliably interface with various providers' reporting metrics. We recommend Housing and Community Services further explore the cost of this information technology investment and present its findings to the Governor's Office.

Further, the state should continue to support work which expands access to broadband. The Legislature should consider expanding existing forms of funding or alternative sources to support broadband deployment across the state, specifically in rural, and hard to reach communities.

¹³ Energy Trust of Oregon, "Manufactured Home Replacement Pilot", https://www.energytrust.org/wp-content/uploads/2017/08/ManufacturedHome_FS_2017.pdf

Conclusions

We would like to thank the Governor for her foresight in putting this working group together. This working group has given those of us who have participated a great opportunity over the last few months to further develop our understanding of how these programs are working and what the gaps are in meeting the needs of Oregonians.

We acknowledge, however, that for the next phase of this work we need to engage organizations and individuals who have direct experience with participating in low-income energy programs. To ensure broad perspectives are represented, engaging communities of color, tribes, seniors, people with disabilities, and rural Oregonians to continue this conversation through the Energy Burden and Poverty Task Force should be a high priority. We look forward to the next steps and helping to develop an action plan to enact our recommendations.

Appendix A

Attendee List

Name			Organization		
1	Ted Case	Oregon Rural Electric Cooperative Association	26	Kathryn Williams	NW Natural
2	Britni Davidson	Salem Electric	27	Keith Kueny	Community Action Partnership of Oregon
3	Sen. Michael Dembrow	Oregon State Senate	28	Janice Thompson	Oregon Citizens' Utility Board
4	Rep. Pam Marsh	Oregon State House of Representatives	29	Carrie Nelson	Bonneville Power Administration
5	Rick Hodges	NW Natural	30	Rose Bak	Multnomah County
6	Jess Kincaid	Bonneville Power Administration	31	Oriana Magnera	Northwest Energy Coalition
7	Bob Jenks	Oregon Citizens' Utility Board	32	Tim Lynch	Multnomah County
8	Jennifer Joly	Oregon Municipal Electric Utilities	33	Jason Eisdorfer	Oregon Public Utility Commission
9	Tom McBartlett	City of Ashland	34	Jaimes Valdez	Spark Northwest
10	Becky Eberle	Pacific Power	35	Alex Buylova	Oregon Housing and Community Services
11	Jay Ward	Energy Trust of Oregon	36	Nicole Stoenner	Oregon Housing and Community Services
12	Hannah Cruz	Energy Trust of Oregon	37	Paul Rossow	Oregon Public Utility Commission
13	Ariel Nelson	Oregon Housing and Community Services	38	Jordan Bice	Oxley and Associates
14	Wendy Gerlitz	Northwest Energy Coalition	39	Lisa McGarity	Avista
15	Dan Elliot	Oregon Housing and Community Services	40	Maria D. Hernandez	OPAL Environmental Justice
16	Sunny Radcliffe	Portland General Electric	41	Marisa DeCristoforo	Portland General Electric
17	Danelle Romain	Oregon People's Utility District Association	42	Brian Fjeldheim	Oregon Public Utility Commission
18	Claire Seguin	Oregon Housing and Community Services	43	Ana Matthews	Avista
19	Jason Heuser	Eugene Water and Electric Board	44	Craig Patterson	Member of the public
20	Anna Wade	Eugene Water and Electric Board	45	Jaime Majure	Avista
21	Lesley Jantarasami	Oregon Department of Energy	46	Jason Hoffman	Pacific Power
22	Kristen Sheeran	Carbon Policy Office			
23	Colin McConnaha	Carbon Policy Office			
24	Kathy Zarate	Oregon Public Utility Commission			
25	Julie Peacock	Oregon Public Utility Commission			

This participant list was developed from attendee sign in logs prior to each stakeholder meeting. It may not be exhaustive; however, it does reflect the range of stakeholder participation in the Low Income Utility Program Working Group.

Appendix B

Low-Income Programs by State

The Public Utility Commission has compiled information from the National LIHEAP Clearinghouse on the low-income programs from a selection of U.S. states.

A. Bill Discount Programs:

- *Percentage of Rate or Bill:* Arizona, California, District of Columbia, Hawaii, Indiana, Minnesota, Missouri, Montana, New Hampshire, New York, Texas, Vermont, Washington, West Virginia
- *Deposit or Service Charge Waivers:* Alabama, Arkansas, Georgia, Louisiana, Mississippi, Texas
- *Bill Credit:* Missouri, Montana, New Jersey, Oklahoma

B. Percentage of Income Payment Program: Colorado, Ohio, Illinois, Kentucky, New Jersey, Pennsylvania

C. Crisis Bill Assistance: New Jersey, North Carolina

D. Tax Rebates and Exemptions: Arkansas, Colorado, Maryland, Michigan, New York, Virginia, Wyoming

E. Weatherization¹⁴: Arizona, Colorado, Florida, Hawaii, Kentucky, Montana, New Hampshire, Pennsylvania, Vermont, Washington, Wisconsin

F. System Benefit Charges: Connecticut, Vermont, Illinois, Maryland, Nevada, New Hampshire, New Jersey, Ohio, Texas, Vermont, Wisconsin

G. Arrearages Forgiveness: Connecticut, Ohio, Illinois, New York, Tennessee, Texas

H. Winter/Summer Specific Programs: Connecticut, Delaware, Minnesota, Missouri, North Dakota, Oklahoma

I. Other types of programs:

- Donation programs: several utilities offer donation programs where ratepayers can donate to assist their neighbors in need.
- Landlord and Tenant Agreements: Assessment of landlord tenant agreements in nineteen states indicates that the majority of agreements include provisions restricting increases in rent, evictions, and sale of the rental property due to weatherization improvements.¹⁵ A smaller, yet significant number of the agreements also require landlord contributions when feasible. *States with these agreements are: Alaska, California, Connecticut, Florida, Idaho, Indiana, Kansas, Kentucky, Massachusetts, Michigan, Montana, Nevada, New Mexico, New York, North Dakota, Utah, Washington, Wisconsin, and Wyoming.*

¹⁴ Through U.S. DOE all states have weatherization programs, this is a collection of states with unique weatherization programs identified which may be of interest to the work group.

¹⁵National consumer Law center , Inc. Landlord-tenant weatherization agreements in the following states: Alaska, California, Connecticut, Florida, Idaho, Indiana, Kansas, Kentucky, Massachusetts, Michigan, Montana, Nevada, New Mexico, New York, North Dakota, Utah, Washington, Wisconsin, and Wyoming.

- Documentary stamp sales: Florida
- Education Programs: Tennessee

Summary of Selected Bill Assistance and Weatherization Programs By State

Alabama

- Neighbors Helping Neighbors Fund In 1996, Senate Bill 45 was passed in the legislature providing for a state low-income weatherization program to supplement federal funds by including a *voluntary tax check-off option for state income-tax filers*. Taxpayers may designate an amount of their refund as a voluntary contribution to the "Neighbors Helping Neighbors Fund" The Department of Economic and Community Affairs will administer the monies, which will help provide weatherization assistance to eligible recipients.
- **Alabama Power Co.:** Customers who are verified as Supplemental Security Income (SSI) or Medicaid for Low Income *Families (MLIF) recipients may qualify to receive a monthly base charge discount of approximately \$14.50.*

Alaska

- Power Cost Equalization Program (PCE) PCE program provides economic assistance to customers in rural areas of Alaska where the kilowatt-hour charge for electricity can be three to five times higher than the charge in more urban areas of the state. The program seeks to equalize the power cost per kilowatt-hour statewide.

Arizona

- Energy Support Program: offers a discount up to 40 percent off the cost of electricity for customers who meet certain income guidelines. The income guidelines are based on 150% of the federal poverty guidelines and change every July 1st. The discount varies depending on how much electricity is used each month.
 - Example program: Arizona Public Service: Energy Support (E3) and Medical Care Equipment (E4) Programs: *Offers a discount up to 65 percent off the cost of electricity for customers who meet certain income guidelines.* The income guidelines are based on 150% of the federal poverty guidelines and change every July 1st. ***The discount varies depending on how much electricity is used each month.***
- Tucson Electric Power: since 1982 the Tucson Urban League and Pima County have been assisting low-income residents in reducing energy use and lowering their utility bills by implementing year-round *weatherization measures* - at no cost to eligible customers. TEP conducts energy audits and provides funding for weatherization measures.
- Salt River Project (Weatherization) SRP provides up to \$6,000 per eligible household for energy-efficiency home improvements on top of federal funding.
- Southwest Gas (*Weatherization Program*): Energy-saving measures are available to income-qualified customers, at no cost. Examples of energy-saving measures are caulking, insulation, weather-stripping, ductwork repairs and windows.
- UniSource Energy Services (*Low-Income Weatherization Program*): this program complements the federal weatherization assistance program to provide energy efficiency measures and improvements to more UES customers. UES partners with Community Action and other agencies located within the UES service territories who are responsible for outreach, arranging of the installation/work, and submittal of invoices to UES.

Arkansas

- Entergy Arkansas Sales tax exemption on the first 500 kWh used each month for customers with an annual household income of less than \$12,000.
- Empire District Electric Company Empire's Action to Support the Elderly (EASE) Provides late fee and security deposit waivers for seniors age 60 and older and disabled customers.

- CenterPoint Energy: Good Neighbor Fuel Fund, donations from customers and employees are matched by CenterPoint. The Good Neighbor Fuel Fund is integrated and coordinated with LIHEAP by supplementing LIHEAP dollars after the program has ended or when benefits are insufficient to meet the household's needs.

California

- California Alternate Rates for Energy (CARE): Low-income customers that are enrolled in the CARE program receive a 20 percent discount on their electric and natural gas bills. Check the website for income eligibility guidelines.
- Family Electric Rate Assistance (FERA) If you don't qualify for CARE, you may qualify to receive a 12% discount on your bill every month through FERA. FERA is only open to households with three or more people.
- Southern California Edison Energy Assistance Fund: Provides one-time assistance of \$100 during a one-year period.

Colorado

- Property Tax, Rent, and Heat Rebate: Operated through the state Department of Revenue, allows tax rebates for home heating payments to residents at least 65 years old, surviving spouses at least 58 years old, or to disabled. The income limit for single households is \$11,000, for married couples, \$14,700. Qualified applicants can receive a rebate of up to \$600 of their property tax and \$192 directly or as part of their rent payments, by filing the Property Tax/ Rent/Heat Rebate Application Form 104PTC.
- Black Hills Energy: If you qualify for federal low-income assistance, then you may also qualify for the Weatherization Program offered by Black Hills Energy and The Governor's Energy Office. This program provides free funding for home improvements such as space and water heating equipment upgrades, insulation, low flow showerheads and faucet aerators.
- Home Energy Resources: Homeowners and renters may be eligible for our no cost weatherization and furnace services. We serve homes in El Paso, Elbert, Douglas, Fremont and Teller Counties.

Connecticut

- Contingency Heating Assistance Program: CHAP is for households with higher incomes, 60 percent of State Median Income, than would qualify for the Connecticut Energy Assistance Program.
- A systems benefits charge (SBC) imposed on customers of the state's two investor-owned utilities — Connecticut Light & Power and United Illuminating — pays for some low-income programs. SBC-funded arrearage, uncollectibles, and hardship programs for both utilities amounted to about \$7.2 million in 2004. All gas public service companies are required by statute to operate an arrearage forgiveness program for gas heating customers. Arrearages are forgiven if customer makes regular payments. Eligibility criteria include: arrears of \$100 or more that are 60+ days overdue, income of less than 200% FPG, and have had at least \$25 paid toward bill by LIHEAP (or other assistance program). Electric utilities have voluntary arrearage forgiveness as part of budget programs.
 - New Start Customers can reduce or eliminate their past-due balance if they pay an agreed-upon budgeted amount on time, each month. Eligibility: current Eversource residential customer; arrears of \$100 or more that are 60+ days overdue; applied for, and be eligible to receive, energy assistance funds, or be able to provide other proof of income; and a "good faith" payment is required for enrollment in the New Start program and varies by customer based on payment history.
 - Matching Payment Plan Customers who maintain eligibility under the Matching Payment Program will see an additional reduction in their past-due amount for every dollar paid to CL&P.

- Winter Protection Program Protects hardship customers from electric service shut-offs or natural gas shut-offs for nonpayment from Nov. 1 to May 1. To qualify, a customer's total household income will be considered. Additional criteria that may also qualify a customer for Winter Protection can include aid to the blind, elderly and disabled, temporary family assistance, food stamps, Medicaid, general assistance, Supplemental Security Income (SSI), or a serious or life-threatening illness in the household. Customers still receive their bills and should try to pay what they can each month to avoid a larger balance due when the protection period ends.

Delaware

- **Sharing Program:** The Sharing Program assists elderly, disabled or fixed income households with winter heating costs. Customer donations and matching shareholder contributions are administered by Catholic Charities in Kent and New Castle counties and by the Salvation Army in Sussex county.
- **Delmarva Power:** Good Neighbor Fuel Fund Conectiv matches customer contributions with a donation from shareholders. A household must first apply for LIHEAP. Funds are administered by the Salvation Army.

District of Columbia

- **PEPCO Residential Aid Discount (RAD):** This program offers eligible PEPCO customers who do not have all-electric heating a 63% discount on the first 400 kilowatt-hours in summer months (June - October) and a 32% discount on the first 400 kilowatt-hours in winter months (November - May) For the typical RAD customer, this translates into a savings of \$12 per month in the summer and \$6 per month in the winter or \$102 per year. For eligible residential customers who have all-electric heating the discount is 38% on the first 700 kilowatt-hours of electricity used in summer months (June - October) and a 51% discount on the first 700 kilowatt-hours in winter months (November - May). For the typical RAD customer, this translates into a savings of \$20 a month or \$240 a year.
- **Washington Gas Company Residential Essential Service (RES):** This program offers discount gas rates, based on household size and income level, during the winter months from November through April. There are three classifications: Class C may receive a total discount up to \$142.02, Class B up to \$151.03 and Class A up to \$189.08.

Florida

- In 1992 the Florida legislature passed the William E. Sadowski Affordable Housing Act. Funding comes from a portion of documentary stamp taxes on deeds and supports two programs that supplement the state's WAP: State Housing Initiatives Partnership, which funds weatherization measures; and the Low-Income Emergency Home Repair Program, which funds emergency and energy-related home repairs.
- **Neighborhood Weatherization** The program is made possible through a partnership with Tampa Hillsborough Action Plan (THAP), a non-profit agency that distributes Tampa Electric-provided energy-saving kits at no cost. To qualify, your total household income may not be more than 200 percent above the national poverty level. Preference is given to elderly (60 years-plus) or physically disabled residents, families with children under 12 and households with a high energy burden (repeated high utility bills).

Georgia

- The regulated natural gas provider program, provided by SCANA Energy and partially funded by the state's universal service fund, provides natural gas service to low income households and to consumers who are unable to obtain or maintain natural gas service from another marketer. Households meeting the low-income requirements established by the Georgia Department of Human Resources qualify for a reduced security deposit, special rates and a lower customer service fee.

- *Low-Income Rate Assistance:* Since 1989, the Public Utility Commission (PUC) has mandated that major gas and electric utilities waive their monthly service charge for customers over age 65, who own their homes, and earn less than \$12,000 per year.

Hawaii

- **Hawaiian Electric Co.:** A new decision by the PUC allows the total amount of electricity used by qualifying low-income customers to be billed at the lowest rate tier. Eligible customers must provide a copy of their qualification letter for the federally funded Low Income Home Energy Assistance Program.
- **Kauai Island Utility Cooperative Qualifying Member Appliance Replacement Program:** The purpose of this program is to help qualifying low-income seniors (age 60+) reduce their residential electricity use by replacing older, less efficient refrigerators and defective electric water heaters with new, more efficient ones at no cost to the member. Qualified participants must own their homes, own the refrigerator and meet federal poverty guidelines for the program year. The refrigerator to be replaced must be at least 11 years old and be the primary refrigerator. There can be no additional refrigerators in the home. This program is offered in partnership with the County of Kauai. Members must contact the County of Kauai Offices of Community Assistance Agency on Elderly Affairs to determine eligibility.

Illinois

- Effective 1998, the Supplemental Low-Income Energy Assistance Fund (SLEAF) was authorized through electric utility restructuring legislation. The law directed gas and electric utilities to assess a monthly surcharge from customers and deposit it into a state fund, which the General Assembly appropriates yearly to the state Department of Commerce and Community Affairs, the LIHEAP and weatherization grantee. Annually, about 80 percent of the fund, \$65 million, goes for low-income bill payment assistance, and 10 percent, about \$7.6 million, supplements the state's weatherization program. LIHEAP makes payments from the fund directly to utilities. SLEAF funds may be used only for assistance to low-income customers of the utilities that assess the surcharge
- **Percentage of Income Payment Plan (PIPP):** Under PIPP, an eligible client pays a percentage of their income, receive a monthly benefit towards their utility bill, and receive a reduction in overdue payments for every on-time payment they make by the bill due date.
- **Warm Neighbors Cool Friends:** *Provides bill payment assistance for qualifying customers — the program is designed to help those who generally do not qualify for federal or state heating assistance. The program targets low- to moderate-income families and senior citizens at 150-200% of poverty.* Eligible households can receive up to \$700 a year to help pay for energy costs (\$350 during the heating season and \$350 during the cooling season.) To receive assistance, qualifying customers must first make a payment on their utility account; Warm Neighbors Cool Friends will then make a matching payment. A statewide network of social service agencies and community organizations determine applicant eligibility.
- **Good Samaritan Initiative:** Qualified participants can get their service restored by paying 20 percent or \$250 of their remaining balance. To qualify, utility customers must have account balances too high to be covered by the state's Low Income Home Energy Assistance Program, but less than \$3,000. The initiative is run by the Illinois Department of Healthcare and Family Services.

Indiana

- Legislation, since 1894, requires Indiana's 1,008 towns and townships to provide "poor relief" that can include housing, utility, food, and medical assistance. Townships are local governmental units within counties and cities, with elected boards and trustees. Property taxes fund "poor relief"; each local entity establishes spending guidelines for the funds.
- **CARE:** Provides bill reductions in addition to LIHEAP for customers falling within 150 percent of federal poverty guidelines. Once they are approved for LIHEAP, customers are automatically enrolled in the program and reductions range from 11 to 26 percent, depending on the same criteria used by the state in determining the level of assistance through LIHEAP.

The monthly discount will be applied starting with December bills and will continue through May 31. If you apply for LIHEAP after December, the discount will be applied on the first bill after program enrollment.

- Universal Service Program: Eligible customers, who have applied for the state's LIHEAP through local community action agencies, will automatically be enrolled in the USP and will receive bill reductions in addition to LIHEAP. *Monthly bill reductions will range from 9 percent to 32 percent of the total bill (not including LIHEAP benefits), depending on the consumer's income level and utility provider.*
- Share the Warmth: Vectren matches all public donations, up to an annual total of \$200,000. Funds are distributed annually to the Indiana Low Income Weatherization Assistance Program. Weatherization services vary with each home, depending on home construction and condition. Recipients must be at or below 150% of federal poverty guidelines and can apply by visiting their local Community Action Agency.

Kentucky

- Project WARM: Since 1982, Project WARM has provided free weatherization and energy conservation services to residents of Louisville and Jefferson County. Weatherization measures include sealing air leaks, adding attic insulation, and offering energy education. *Free self-help classes on window cover installation and conservation measures are available during the winter.*
- Home Energy Assistance Provides a year-round fixed credit that varies by month and is based on the household's income, size and utility bills for the previous 12 months, an adjustment for monthly normal heating degree days, and any significant changes in utility pricing. The credit can be applied to arrearages. Customers with household income at or below 110% of federal poverty guidelines must have a minimum monthly household income of \$100 and household utility arrearages under \$700 and to participate.

Louisiana

- Entergy Gulf States Utilities, Inc. Senior Discount Program: Waiver of \$6.00 monthly customer charge for customers who are 65 or older and have an annual income less than \$10,000.

Maine

- Low-Income Assistance Program (LIAP): Maine's transmission and distribution utilities are required to create or maintain a LIAP to make electric bills more affordable for LIHEAP-eligible customers. The Maine State Housing Authority administers, implements and coordinates the statewide plan and the individual LIAPs in conjunction with its delivery of LIHEAP. The fund amounts to approximately \$5.7 million yearly.

Maryland

- Electric Universal Service Program (EUSP): Authorized through restructuring legislation, the EUSP includes current electric bill assistance, retirement of certain old bills, and weatherization services. Its funding of \$34 million per year continues but is subject to annual review and approval by the Maryland Public Service Commission (PSC) and the legislature. Eligibility: electricity customers with incomes at or below 150% FPL. Eligible customers may receive both EUSP and LIHEAP.
- St. Mary and Prince George Counties: Local energy tax dollars are given in a rebate to low-income households in two counties. In St. Mary's County, a payment of \$55 is sent to MEAP households. In Prince George's County, the MEAP grant is \$72 per household.

Massachusetts

- Residential Assistance for Families in Transition (RAFT) Program: RAFT is a Department of Housing and Community Development (DHCD) funded homelessness prevention program. RAFT provides short-term financial assistance to low-income families who are homeless or at risk of becoming homeless. RAFT offers flexible financial assistance designed to meet each family's particular needs. Eligible uses include moving cost assistance, rent and utility arrears,

rental stipends which help families who are behind on rent, or utility bills. RAFT also helps families who have to move but do not have enough money to pay a security deposit, utility startup costs, or first/last month's rent and furniture (no more than \$1000 of the family's \$4000 assistance can be paid for furniture). Families can get up to \$4000 within a 12-month period.

- Over a dozen gas, electric and combination IOUs offer utility rate discounts totaling nearly \$40 million per year and ranging from 20 percent to 42 percent off the low-income customer bill. These discounts were negotiated during the past two decades and were required to continue under Massachusetts' restructuring legislation. Households earning less than 175 percent of Federal Poverty Guidelines, or receiving one of several means tested programs, including LIHEAP, Food Stamps, TANF and SSI are eligible.
- Discounted Residential Rates: Discounted non-heating and heating delivery charges are available to low-income customers who qualify for any means-tested public assistance programs or LIHEAP and household income is at or below 200% of the federal poverty level.

Michigan

- Low-income Rate Assistance: Basic maintenance benefits for LIHEAP are issued through the Home Heating Credit to all low-income households. The Michigan Department of Treasury determines eligibility and makes the payments. You do not need to file a state income tax return to receive the Home Heating Credit. You may apply for the Home Heating Credit only. Eligibility is based on income, number of exemptions and household heating costs.
- Residential Income Assistance Credit: Low-income customers may qualify for a \$6 per month credit on their electric, and/or a \$10.50 per month credit on their natural gas account, if served by DTE Energy.
- Senior Citizen Electric Service Rate: depending on energy use, seniors 62 and older could save up to 37 percent — about \$16 each month on their electric bill. If you use an average of less than 650 kilowatt hours per month, this rate will be beneficial to you. Your actual savings will depend on the amount of electricity you use.

Minnesota

- The Minnesota Department of Human Services provides funds for emergency crisis assistance to households who would otherwise be without heat.
- As a result of legislation passed in 1994, Minnesota requires that electric companies serving over 200,000 residential customers provide a 50 percent discount for low-income customers on the first 300 kilowatt hours consumed each month. The provision applies only to the state's largest utility, Xcel Energy. The average benefit is \$108 per household. Legislation passed in 2007 requires all natural investor-owned gas utilities to provide a Gas Affordability Program which reduces natural gas utility payments from participants to no more than 6 percent of their income. Participants may also receive credits on their monthly natural gas bill. Receipt of LIHEAP is required.
- Low Income Senior Discount: Energy Assistance Program participants may be eligible for the low-income discount. The low-income discount entitles low-income residential electric/gas customers who are 62 years of age or older and/or disabled to a 50 percent discount on their monthly electric consumption up to 300 kilowatts per hour, per billing period.

Mississippi

- Monthly base charge is waived (\$0.59 per day) for eligible low-income and elderly customers receiving SSI or TANF.

Missouri

- Eligible customers (up to 135% of poverty) will receive credits on their bills during the heating and/or cooling season if they remain current with payments. Selected energy-assistance organizations that distribute Dollar More funds will also help determine which customers qualify to enroll in "Keeping Current."

- **Economic Relief Program:** This program is for eligible lower- to moderate-income customers in Missouri who don't typically qualify for government-assistance programs. It provides a KCP&L bill credit of up to \$50 per month, for a maximum of twelve consecutive months, to qualified customers.
- **Independence Rate Assistance Program (IRAP):** Qualified elderly, 60 years or older, or disabled customers pay 50% of the electric charges on their bill. Contact the Community Services League.
- **Ameren Missouri:** Qualifying low-income homeowners and renters within the area are eligible to receive assistance in the form of weatherization improvements to their homes through local agencies. Elderly and disabled persons are given preference.

Montana

- Customers who qualify for LIHEAP, automatically receive a discount on their NorthWestern Energy electric and natural gas bills.
- **Flathead Electric Cooperative:** Eligible members receive a credit equal to half the basic charge on their bill each month. In most cases this is an \$11.36 per month credit. Residential members must qualify as low-income according to the guidelines set by LIHEAP (150% of federal poverty level). Members qualifying with LIHEAP after October 1 will automatically be eligible. All recipients must reapply each year.
- **Sun River Electric Coop Home Weatherization Program:** Provides funding to weatherize residential homes for low-income households located within the service delivery area of Sun River Electric Coop. Energy saving practices such as insulation, window replacement, weather stripping and furnace repair or replacement qualifies under this program.

Nebraska

- **Share Some Warmth:** Funds, collected by Hastings Utility and administered by the Salvation Army, are distributed for utility bills from December 1st to April 30th. Eligibility includes: age 60 or above and/or handicapped (special hardship or crisis situations may be considered); delinquent utility bill subject to cutoff; and applicant is unable to qualify under other governmental assistance programs.
- **Omaha Public Power District Energy Assistance Program (EAP):** EAP was established in 1988 to help disadvantaged families pay energy-related expenses primarily during the spring, summer and fall months. Such expenses might include higher-than-normal summer cooling bills or emergency equipment repairs. Funds for the program come from customer donations and newsletter advertising revenues.

Nevada

- In August 2001, a Universal Energy Charge (UEC) was imposed on customers of electric and gas utilities to pay for low-income energy programs. About \$10 million is raised annually with 75% to be distributed through the state LIHEAP agency to supplement LIHEAP; and 25% through the state weatherization agency for low-income energy efficiency.

New Hampshire

- An 1840's statute requires towns and cities to provide emergency welfare services to the poor, funded by local property taxes. Typically, assistance includes payments to landlords and utilities for rental and utility assistance, vouchers for food and clothing, as well as burial expenses.
- **Electrical Assistance Program (EAP):** EAP is a program for customers of Liberty Utilities, New Hampshire Electric Cooperative, Eversource and Unitil Energy Systems. If you qualify, discounts ranging from 8% to 76% on the first 750 kWh of residential electric service are available. To apply, you must contact your local Community Action Agency (CAA) and complete the EAP application. Your local CAA will determine your eligibility based on your annual household income and will notify your utility if you qualify for this program. If you

qualify, the EAP Discount amount will appear on your bill and will be deducted from your electric bill.

- As of June 1, 2002, electric utility customers can take advantage of statewide energy efficiency products and services funded by the energy efficiency portion of the System Benefits Charge (SBC). Qualified low-income customers living in an apartment or house, either rented or owned, can receive up to \$3,600 in services (\$5,900 if customers also qualify for the NH Weatherization Assistance Program), including a customized report analyzing their home, improvements including insulation, thermostats, lighting upgrades, and efficient refrigerators, and recommendations on how to use energy more efficiently.

New Jersey

- **Lifeline Assistance Program:** Funded from the New Jersey general fund, Lifeline provides a credit on electric or natural gas bills of \$225 per year to disabled and senior homeowners and tenants. Beneficiaries of Medical Assistance to the Aged, Medical Assistance Only, or New Jersey Care, are sent Lifeline applications automatically every August. Supplemental Security Income recipients receive Lifeline automatically.
- **Universal Service Fund:** USF is a program created by the State of New Jersey to help make natural gas and electric bills more affordable for low-income households. The USF will fund a fixed credit percentage of income payment plan under which participants will be required to pay no more than six percent of their annual income toward electric and gas bills. New Jersey electric and gas customers whose household income is equal to or less than 175 percent of the federal poverty level are eligible for the program
- **Payment Assistance for Gas & Electric (PAGE):** PAGE is a state-funded utility assistance program, administered by the Affordable Housing Alliance (AHA) through select state-designated agencies. It is designed to help low-to moderate-income New Jersey households who are experiencing economic hardship and struggling to pay their electric and natural gas bills.
- **New Jersey Comfort Partners:** A residential low-income program provided by PSE&G, Jersey Central Power & Light, Atlantic City Electric (Conectiv), Rockland Electric Company, New Jersey Natural Gas, Elizabethtown Gas and South Jersey Gas through the Societal Benefits Charge created under New Jersey's restructuring legislation. Energy efficiency measures include: efficient lighting products, hot water conservation measures, refrigerator replacement, programmable thermostats, insulation upgrades, air sealing, duct sealing and repair, and heating/cooling equipment maintenance, repair and/or replacement. Energy education and counseling and arrearage forgiveness for participants who agree to payment plans are included. Eligibility: Income at or below 175 percent of federal poverty guidelines or customers who receive Lifeline, LIHEAP, TANF, SSI, and PAAD, General Welfare Assistance, and Section 8 Housing Assistance.

New York

- A Home Energy Allowance is provided to public assistance recipients from state and local funds; New York law exempts the collection of utility sales tax from certain public assistance recipients; also provided from state and local funds is payment of utility arrears for public assistance clients.
- New York's eight investor-owned utilities, and one municipal power authority, have low-income energy programs totaling about \$20 million per year. The programs vary considerably by utility service territory and have varying eligibility guidelines. Most offer rate assistance and one or more other services such as arrearage forgiveness, weatherization, appliance repair and replacement and aggregation.

North Carolina

- **Dominion North Carolina Power EnergyShare:** A fuel assistance program that helps pay home heating bills for those in need living within the company's service area. It pays for any heating source: oil, gas, kerosene, wood, and electricity. It is a program of last resort for the elderly, the ill... for all who face financial hardships from unemployment or family crisis. Payments go

directly to energy vendors on behalf of those helped.

North Dakota

- Qualifying households can get a voucher for up to \$300 from their local county social services office to buy a window air conditioner and fans. To qualify, the low-income household must have at least one person with a medical need that makes him or her vulnerable to heat-related illnesses. A note is needed from a medical professional verifying that he or she has a condition.

Ohio

- **PIPP Plus:** Ohio's regulated gas and electric utilities are mandated to participate in the statewide PIPP. Low-income customers who heat with natural gas pay 6 percent of their monthly income or \$10 (whichever is greater) to their gas or electric company. Customers with all-electric homes pay \$10 or 10 percent of their gross monthly household income each month, whichever is greater. Zero-income customers are required to pay a \$10 minimum monthly payment for both natural gas and electric. When PIPP Plus payments are made on time and in full, customers earn an incentive credit and an arrearage credit. Each time they pay their required monthly payment on time and in full, they no longer owe the rest of that month's billed amount. They also receive a one-twenty-fourth credit toward any old debt. If they make full, on-time payments for 24 months straight, all of the arrearages would be eliminated. Eligibility: must receive primary or secondary heat source from a company regulated by the Public Utilities Commission of Ohio, total household income must be 150 percent FPG or below, and, if eligible, must apply for all energy assistance programs.
- Allows residential customers of regulated utilities that have been disconnected or are threatened with disconnection due to non-payment of a utility bill to have service restored by paying either the total amount they owe or \$175, whichever is less, plus a reconnection fee of no more than \$36. The Winter Reconnect Order may be used once during each heating season, which runs from mid-October through mid-April. There is no income eligibility requirement for the Winter Reconnect Program. Income-eligible households can use Emergency Home Energy Assistance Program (E-HEAP) funds for the \$175 payment. No signup is required. If service has been disconnected for non-payment or is being threatened with disconnection, the customer must pay the required fees to the utility company and follow the company's procedures to get reconnected. If paying at an authorized agent, the customer will also need to call the utility with the receipt number to report the payment.
- The Electric Partnership Program (EPP) was provided for under Ohio's 1999 electric restructuring legislation and is funded by the electric universal service rider. Its goal is to reduce electric consumption by households that participate in the state's Percentage of Income Payment Plan (PIPP). The program is targeted to high consumption, high arrears PIPP households and is composed of two types of programs:
 - A baseload efficiency program which audits lighting, appliances and all other uses of electricity not related to heating and installs appropriate measures; and,
 - A weatherization program for those who heat with electricity and who have moderate to high usage. This program adds insulation, performs heating system inspections and addresses health & safety measures.

Oklahoma

- Oklahoma Gas & Electric: Eligible LIHEAP customers certified to OGE by the Department of Human services (DHS) receive a \$10 credit per month on their bill.
- LIHEAP customers receive a reduced gas bill which averages \$5.03 a month during the winter months (October through April) and \$4.26 during the summer months

Pennsylvania

- Pennsylvania's major gas and electric utilities are required to provide Customer Assistance Programs (CAPs), which generally provide a percentage of bill plan or a percentage of income

payment plan, wherein low-income customers' utility payments are based upon their incomes and/or utility bills. Some programs include utility arrearage forgiveness; others provide flat rate discounts or bill credits. Under electric and gas restructuring legislation all electric and gas utilities are required to offer universal service programs, to include CAPs, and to continue pre-restructuring low-income programs.

- Mandated by a 1987 PUC order, the Low-Income Usage Reduction Program (LIURP) was renewed in 1992 through 1996, and continued under universal service provisions of electric and gas utility restructuring legislation. The state's 15 major gas and electric utilities participate in LIURP with a pre-restructuring funding level of about 2/10 of one percent of each utility's total revenues. LIURP includes an education component that addresses energy savings, regular bill payment behavior and provides application assistance.
- Emergency Repair Fund Offers financial assistance for the repair or replacement of natural gas furnaces, water heaters, service & house lines and space heaters serving as the primary heat source for a residential dwelling. This program is designed to address emergency situations that involve unsafe service conditions for residential heat customers with low incomes, who own and are living in their home.

Tennessee

- Memphis Light Gas and Water On Track A: payment program designed to help customers with limited incomes to manage debt and pay off their bills over a period of time. The program focuses on education, financial management and social services. To qualify for the program customers must have a steady, but limited, income and owe more than \$600 to MLGW. Participants may receive Extended Payment Plans for up to three years and deposit credited back to the account after completion of program.
- Memphis Light Gas and Water EnergySmart Memphis: A year-long energy education and home improvement initiative designed to help Memphians save money on their energy costs. Customers will receive in-depth energy conservation training and eligible customers will have weatherization improvements made to their home. As part of the initiative, MLGW also has set aside funds to weatherize of customers who meet federal poverty guidelines

Texas

- The electric competition law created a System Benefit Fund, part of which is used to help finance energy efficiency programs. The Texas Department of Housing and Community Affairs (TDHCA) will administer energy efficiency programs in coordination with existing weatherization programs. Utilities will develop standard-offer programs to install energy efficiency measures that may include: compact fluorescent light bulb lease-purchase programs, refrigerator and air-conditioner lease-purchase programs, and water-flow restrictors (low-flow shower heads and faucet aerators) provided free of charge. Independent service providers will deliver these services to customers. TDHCA operates partnership programs with: Central Power & Light, El Paso Electric, Entergy, HLP / Reliant, Southwest Public Service, Southwestern Electric Power, Texas Utilities Electric, Texas-New Mexico Power and West Texas Utilities.
- CPS Energy (San Antonio) Affordability Discount Residential customers whose income is at or below 125% of Federal Poverty Guidelines and who meet at least one of the following requirements qualify for a discount on their monthly service availability charge — \$6.55 per month for electric customers and \$3.15 for gas customers. In addition to meeting Federal Poverty Guidelines, qualified individuals: must be 60 years of age or older; have a disability; use life-sustaining medical equipment; or have pre-school aged children or children in school 18 years or younger; meet Veterans' Discount qualifications; or have extenuating circumstances determined by CPS Energy or the City of San Antonio.
- Reliant has a moratorium on disconnecting electricity service for low-income seniors, critical-care customers and other low-income residential customers who contact Reliant Energy and agree to a payment plan
- Waived residential customer deposits for senior citizens 65 and older.

- Low Income Deposit (LID) Program: Assists customers in the Centerpoint service territory to pay the deposit for their electricity service. Qualified customers include seniors aged 60-64 (deposit is waived for seniors 65 and above), families with children aged 6 years old or younger and disabled individuals.

Vermont

- General Assistance provides emergency help to meet basic needs, including fuel and utilities. Eligible are persons with little or no income and resources who are unable to work or who have employment barriers. Also persons who have experienced a crisis such as a fire, flood, death in the family or eviction may be eligible. Individuals must apply in person at district offices when they have an emergency.
- The Weatherization Trust Fund, established in 1990, is funded by a 0.5 percent gross receipts tax on regulated utilities and all fuels except wood. The trust fund has raised about \$3 million annually to supplement the Vermont Weatherization Assistance Program.
- Green Mountain Power (GMP) Energy Assistance Program (EAP): Eligible households (up to 150 percent of federal poverty guidelines) can receive a 25 percent discount off their monthly bills for the first 600 kilowatt hours used.
- Vermont Gas Low Income Energy Program (LIAP): A 20 percent discount on bills is available to eligible customers. Households with incomes no greater than 185 percent of the federal poverty level, or that meet income eligibility guidelines for LIHEAP assistance, are eligible for the discount. Eligibility will be determined by the Department for Children and Families Energy Assistance Office.
- Low-Income Energy Efficiency: A unique "energy efficiency utility" called Efficiency Vermont was created by the Vermont legislature and Vermont Public Service Board to provide energy efficiency services to low-income and other customers. The Low-Income Single Family Program provides electric efficiency improvements to eligible customers of Vermont's electric utilities (except in Burlington) who are actively enrolled in the federal Weatherization Assistance Program. Measures include energy efficiency lighting, refrigerator replacement, and water heater efficiency measures.

Virginia

- All participating vendors for the LIHEAP Fuel and Crisis Assistance components agree to waive charging the State Sales Tax on all fuel deliveries. Eligible households receive the amount that would be paid to the State for sales tax in the total amount of fuel delivered.

Washington

- Energy Matchmaker: state general funds go to "Energy Matchmaker" program and are matched by local, utility and other funds. Measures included attic, wall and floor insulation, weather stripping and furnace modifications.
- All of the utilities and Public Utility Districts listed below provide rate discounts for low-income, seniors or disabled customers. Discounts range from 5% to 40% of a customer's utility bill: Tacoma Public Utilities, Seattle City Light, AVISTA utilities, Benton PUD, Chelan PUD, City of Richland, Clark County, Columbia Rural Electric Cooperative, Franklin PUD, Grays Harbor PUD, Klickitat PUD, Mason County PUD, Pacific Power, Pacific Co. PUD, Peninsula Light Company, Snohomish Co. PUD.
- Pacific Power: Works with local agencies to provide free weatherization services to income-qualifying homeowners and renters living in single-family homes, mobile home or apartments. Based on the home's needs, a variety of measures can be installed, including insulation, energy-efficiency shower heads, compact fluorescent light bulbs and more

West Virginia

- Low-Income Rate Assistance: All gas and electric utilities offer a reduced rate of 20% from November - March. Eligible customers must receive either SSI, WV WORKS, or Food Stamps AND be 60 years of age or older. Customers must be a recipient of one of these programs

during November, December, January, February, and March to get the discount for that month. The discount is a Commission Order, dated March 10, 1984 and is administered by West Virginia Department of Health and Human Resources (DHHR), Office of Family Support. The electric and/or gas company will be responsible for determining your eligibility for the Special Reduced Residential Service Rate.

Wisconsin

- Focus On Energy is a public-private partnership offering energy information and services to energy utility customers throughout Wisconsin. The Targeted Home Performance with ENERGY STAR® program assists Wisconsin residents in making energy efficiency improvements to their homes. Wisconsin residents who receive their electricity from a participating utility, and who meet the income requirements, are eligible to participate. Depending on results from a home energy assessment, energy efficiency measures may include insulation, sealing air leaks, heating system update or energy saving devices.
- The Public Benefit Fund legislation also requires municipal electric utilities and electric cooperatives to collect fees annually per customer, with half of the funds collected going to low-income programs. Many municipals and co-ops retain the fees for their own internal low-income/weatherization programs. If approved for LIHEAP, customers of some municipals and co-ops can receive bill credits, home energy efficiency measures or refrigerator replacements.

Wyoming

- Senior Tax Rebate: Provides a tax rebate in the form of a check made out to the client for up to \$500 or \$600 depending on program guidelines. You must be 65 years of age or older, or over age 18 and 100% disabled, and a Wyoming resident for one full year at the time of application. An applicant must be income qualified. Applications available through your local senior center.

Appendix C

Recommendations Summary

- I. **Give utilities the authority to create low-income programs and require annual reporting on data and metrics.**
 - Clarify authority for all utilities, including those regulated by the Public Utility Commission, to allow them to provide a low-income rate.
 - Require reports on disconnect data by utility/region, energy burden by utility, and an equity and access analysis.
- II. **Ensure low- and moderate-income customers, especially seniors, people with disabilities, and environmental justice and rural communities, are resourced to participate in the clean energy transition, including allocating funding which may be available under a Cap and Invest program to mitigate the impacts of climate change on low-income customers, reduce energy burden, and decrease carbon emissions.**
 - Increased funding for low-income weatherization, energy assistance, low-income participation in conservation programs.
 - Develop incentives for renewables and resilience measures which can enable low-income households participate in the clean energy transition.
 - Consider incentives for the use of lower-carbon fuels.
- III. **Make permanent an Energy Burden and Poverty Task Force to formalize and continue to further the development of innovative approaches to meeting the energy burden and reduce the greenhouse gas footprint of low-income Oregonians.**
 - Explore data around low income strategic planning and develop possible policy and programmatic changes.
 - Define the structural barriers to increased access to funding.
 - Explore statewide energy assistance/access programs designed to reach every person that is low-income qualified.
 - Examine how energy burden can be mitigated for moderate-income households.
 - Develop a statewide program for renters and multi-family, based on energy burden. This includes developing a statewide approach to the split-incentive that exists between tenants and landlords/building owners.
- IV. **Implement new programs and enhance existing program designs to reach greater numbers of low and moderate income Oregonians.**
 - Develop state funding for low and moderate-income weatherization.
 - Seek opportunities for cross-qualification to increase access for low-income participation.
 - Develop a statewide program to address energy efficiency and weatherization in manufactured homes.
 - Leverage existing weatherization monies with funding for critical dwelling repairs and health.
 - Encourage exploration and deployment of the statewide Healthy Homes program pilot.
 - Require utilities and low-income assistance programs statewide to examine existing outreach programs to ensure outreach methods are effective at reaching all populations, especially those that are hard to reach or may have language barriers.
 - Support statewide efforts to increase broadband access, especially in rural areas.
 - Advance rate design which enables customer driven conservation.