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Electric Ratepayer Advisory Council Second Annual Report, December 1, 2023

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Janet T. Mills
GOVERNOR

William S. Harwood
PUBLIC ADVOCATE

December 1, 2023

Joint Standing Committee on
Energy, Utilities and Technology
c/o Legislative Information Office
100 State House Station
Augusta, ME 04333-0100

RE: Report from the Electric Ratepayer Advisory Council

Dear Committee Members,

Pursuant to Public Law 2021, Chapter 623, attached please find the second Annual Report of the Electric Ratepayer Advisory Council, which includes SAGE Management Consultants "Low-Income Electric Assistant Program Best Practices Study" (Attachment A) and OPA's Arrearage Management Program Report (Attachment B).

We look forward to presenting the Report and the Council's recommendations to the Committee. We are happy to answer any questions you may have and look forward to receiving your feedback.

Sincerely,

A handwritten signature in cursive script that reads "William S. Harwood".

William S. Harwood
Public Advocate

Cc: Electric Ratepayer Advisory Council

State of Maine
Electric Ratepayer Advisory Council



Second Annual Report
December 1, 2023

The Electric Ratepayer Advisory Council is pleased to submit its 2023 Report to the Joint Standing Committee on Energy, Utilities and Technology. It represents many hours of hard work by the 18 Council members, the Office of the Public Advocate (OPA) Staff, and our consultants at Sage Consulting.

The Report concludes that the approximately 115,000 low-income households in Maine need approximately \$126M of financial help each year to pay their electricity bills. Unfortunately, currently we are only providing approximately \$22.5M of assistance to less than half of those who need help. The Report includes a number of specific recommendations for transitioning to greater affordability for all low-income households, including gradually increasing funding, streamlining enrollment in the LIAP program, minimizing the costs of administering the program, and promoting efficient use of electricity in low-income households. There are 10 specific recommendations for 2024.

Many of the recommendations are straightforward and the Council hopes they can be implemented without delay. Others may require additional analysis before they are ready for final adoption. Specifically, the implementation of some of these recommendations may require significant and time-consuming modifications to the utilities' billing systems.

Although the recommendations and findings in this Report do not necessarily reflect the views of all of the individual Council members, nor the organizations they represent, a significant number of the voting members of the Council believe that each of the 10 recommendations has substantial merit and deserves the careful consideration of the Legislature and policy makers. It is important to note that the five ex-officio members on the Council representing State Agencies (Office of the Public Advocate, Governor's Energy Office, Public Utilities Commission, Efficiency Maine Trust, and Maine State Housing Authority) are non-voting members of the Council.

In addition, several subject matter experts from Maine agencies and the public contributed to the Council's work. The Council is charged to meet at least once per year and each meeting is a public proceeding that may allow for public comment.

The public participated in multiple meetings of the Council. Recordings of each 2023 meeting can be found on the OPA's website here:

<https://www.maine.gov/meopa/about/reports-and-testimony/council>

The recommendations are supported by two Reports that were prepared for the Council and attached hereto: (a) Sage Consulting updated its 2022 Report by performing a

“best practices” analysis of several low-income programs in other states (Attachment A); (b) OPA Report recommending continuance of the PUC’s Arrearage Management Program (AMP) (Attachment B).

Goals

The Council reiterates its recommended goals for the Maine low-income electricity assistance programs:

- Fund assistance as much as possible, up to fully funding all low-income ratepayers’ assistance needs.
- All low-income ratepayers are offered a chance to participate in the programs.
- Enrollment in the program and annual requalification is easy for the participant.
- If full funding of all assistance needed is not possible, lower income ratepayers would get proportionately greater benefits than higher income ratepayers.
- Reductions in electricity usage are encouraged through energy efficiency education, referrals to energy efficiency programs, and price signals to reduce inefficient usage.
- Program design is administratively efficient; that is, as much assistance funding as possible goes to the participants, rather than to administering the program.
- Alternative funding sources (other than ratepayers) should be explored and implemented.

Status of the 2022 Recommendations

In preparing the 2023 recommendations, we reviewed the progress that has been made in implementing our 2022 recommendations. We are pleased with much of the progress but there is more work to be done. The following provides a brief status report on our progress.

Low Income Assistance Program

1. Make Low-Income Assistance Program (LIAP) benefits monthly rather than two lump sum credits per year.

In the PUC proceeding (Docket No. 2023-00056) to set the LIAP program funding amount for Program Year (PY) 2023-24, the OPA recommended this change, citing the ERAC 12/1/22 Annual Report. However, this change was not included in the PUC’s Final Order (Order, March 30, 2023).

2. Simplify the LIAP benefit from a variable allocated annual dollar credit benefit to a consistent dollar discount on the participant's total monthly bill.

Also in Docket No. 2023-00056, the OPA suggested that the LIAP benefit be a monthly uniform rate discount, citing the ERAC 12/1/22 Annual Report. But this suggested change was not adopted by the PUC in its Final Order (Order, March 30, 2023).

3. Provide higher benefits for lower incomes.

On September July 13, 2023, the PUC opened a new proceeding to allocate a one-time addition of \$15 million to LIAP's budget from the General Fund (Docket No. 2023-00175). Half of this temporary funding (\$7.5 million) will be added to LIAP's PY 2023-24 budget, and the PUC predicts this will result in a 31% increase in the average customer benefit amount (Docket 2023-00056, Order, September 27, 2023). The remaining \$7.5 million will be added to LIAP's 2024-25 budget.

4. Increase Department of Health and Human Services (DHHS) expedited LIAP enrollment program to include DHHS client households with incomes equal to or less than 150% of the Federal Poverty Level (FPL).

As a result of the additional \$15 million in LIAP funding allocated from the State budget, the PUC temporarily expanded FPL eligibility for those applying directly through the new DHHS enrollment program to those with up to 150% FPL household income (Docket 2023-00056, Order, September 27, 2023.) The PUC expects that this will increase the number of customers eligible to apply directly through the new DHHS program by approximately 46,000.

5. Make LIAP enrollment automatic for DHHS clients with household incomes equal to or less than 150% of the federal poverty level with an opt-out provision.

On July 11, 2023, Governor Janet Mills signed Public Law 2023, ch. 412 (L.D. 258) which advanced the possibility of automatic enrollment (Part VV). Specifically, DHHS is directed to develop a program whereby DHHS can provide income qualification information to utilities for the purpose administering LIAP.

6. Make LIAP annual requalification automatic in the enrollment month.

Continuing to work with DHHS and the Utilities to have annual re-enrollment occur in the same month in which the participant initially enrolled.

7. Set up an annual adjustment mechanism to allow utilities to provide the full specified monthly discounts to each participant even if the total discounts exceed the budgeted funding in that program year.

In the PUC proceeding (Docket No. 2023-00056) to set the LIAP program funding amount for PY 2023-24, the OPA recommended this change, citing the ERAC 12/1/22 Annual Report. However, this change was not part of the final order (Order, March 30, 2023).

8. Apply LIAP discounts to current bills, not arrearages; encourage participants with arrearages to join the Arrearage Management Program (AMP).

See items #1 and # 2 above.

9. Reconsider the LIAP funding amount when the standard offer rate changes during each program year.

In the PUC proceeding (Docket No. 2023-00056) to set the LIAP program funding amount for PY 2023-24, the OPA recommended this change, citing the ERAC 12/1/22 Annual Report. However, this change was not included the PUC's Final Order (Order, March 30, 2023).

Arrearage Management Program

10. Add LIAP participation as a way to qualify for AMP eligibility.

PUC is considering this change in its current proceeding to amend Chapter 317 of its Rules (Docket No. 2023-00134), as suggested by the OPA citing the ERAC 12/1/22 Annual Report.

11. Repeal the sunset of AMP in 2024.

This will be before the Legislature this session via L.R. 2780, "An Act to Continue Arrearage Management Program Availability for Low-income Residential Customers" (Rep. Foster, Dexter).

12. Switch the use of expiring net energy billing credits for additional arrearage forgiveness in AMP to additional funding for LIAP.

Adopted by Legislature. Enacted Public Law 2023, chapter 230 (L.D. 509).

13. Allow an AMP participant to miss two payments before disqualification.

PUC is considering this change in its current proceeding to amend Chapter 317 of its Rules (Docket No. 2023-00134), as suggested by the OPA citing the ERAC 12/1/22 Annual Report.

14. Allow AMP eligibility once every seven years, rather than just once.

PUC is considering this change in its current proceeding to amend Chapter 317 of its Rules (Docket No. 2023-00134), as suggested by the OPA citing the ERAC 12/1/22 Annual Report.

Electric Cooperative Unclaimed Capital Credit Refunds

15. Allow the electric cooperatives to keep unclaimed capital credit refunds in their communities to use for local low-income ratepayer assistance, rather than sending them to the Maine treasury.

With the help and support of Maine's two electric cooperatives Eastern Maine Electric Cooperative (EMEC) and Fox Islands Electric Cooperative (FIEC), this was adopted by Legislature. Enacted Public Law 2023, chapter 483 (L.D. 2013).

Energy Efficiency

16. Ensure all electric assistance participants have a clear understanding of the energy efficiency programs available to them.

Subject to ongoing work with EMT.

Funding

17. Increase LIAP funding and add new funding sources to the current ratepayer funding of LIAP. Adopted by Legislature.

On July 11, 2023, Governor Janet Mills signed Public Law 2023, ch. 412 (L.D. 258) which, inter alia, provides one-time funding of \$15 million for Maine's statewide Low-Income Assistance Plan (LIAP): \$7.5 million in Fiscal Year 2023-2024 and another \$7.5 million in Fiscal Year 2024-2025.

2023 RECOMMENDATIONS

Recommendations for the Maine Low-income Assistance Program (LIAP)

Based on the recommendations of the Sage Report, the Council makes the following recommendations for modifying the Low-Income Assistance Program (LIAP):

1. Continue expanding funding for LIAP to eventually achieve a four percent affordability target¹ for LIAP participants.
2. Convert program from an annual lump sum benefit to monthly discounts.
3. Set LIAP discount percentages for each of the four FPL tier to achieve an affordability target in each tier, on average.
4. Consider Implementing a consistent charge per kWh for all ratepayers across all utilities to fund LIAP.
5. Increase the LIAP funding from ratepayers.²
6. Increase taxpayer funding by dedicating a portion of the state sales tax on electricity to LIAP funding.
7. Implement an annual true-up with each utility to ensure that they are fully reimbursed for all LIAP benefits and program costs.
8. Implement automatic enrollment for all DHHS clients with household incomes at or below 150 percent of the FPL.
9. Make reasonable accommodations in the implementation of these recommendations for the consumer-owned utilities (COUs) that have limited resources.

Recommendations for the Arrearage Management Program (AMP)

1. Based on the Office of Public Advocate Report, the Council recommends repealing the 2024 sunset of the Program.

The Council believes that these recommendations are consistent with Maine policies and initiatives on climate change, beneficial electrification, and clean energy.

The Council recognizes that its statutory authority goes well beyond the PUC's LIAP and AMP programs. However, because the Council's primary focus is on the affordability of electricity, in its first two years it has concentrated on programs that provide much needed financial assistance to low-income ratepayers. In its third year, the Council looks forward to

¹ Reevaluate the affordability target of 4% over time as beneficial electrification increases electric heating, the use of electric vehicles, and other increases in electricity usage, as usage and costs associated with other fuels decrease.

² An Act to Create the Electric Ratepayer Advisory Council, Public Law 2021, chapter 623 (LD 1913), the legislation creating the Council, includes the language, "Identify methods to fund electric assistance programs that do not result in shifting costs to ratepayers." This recommendation includes funding from taxpayers and allocating the electricity sales tax to LIAP in addition to increasing LIAP funding from ratepayers. We do not believe the statute prohibits increasing LIAP funding from ratepayers; it does require considering other alternatives, which are included here. The Best Practices Study found that the principal funding for all other surveyed states' assistance programs was from ratepayers. New Hampshire was the only surveyed state that had temporary assistance program funding from taxpayers, like Maine.

addressing other issues that affect affordability, including rate design, energy efficiency, and the rate impact of renewable energy subsidies.

Electric Ratepayer Advisory Council Background Information

An Act to Create the Electric Ratepayer Advisory Council, Public Law 2021, chapter 623 (L.D. 1913), was approved by the Governor on April 18, 2022, and took effect that day as an emergency measure. The Act is attached to the Sage Report. In addition to creating the Council, the Act mandated several actions, including:

- The Council shall make recommendations to the Public Advocate regarding methods to ensure that ratepayers are able to afford electricity in the state.
- In developing the recommendations, the Council shall consider existing and projected rates and existing and planned electric assistance programs.
- The Council shall identify methods to:
 - Fund electric assistance programs that do not result in shifting costs to ratepayers.
 - Improve education and outreach efforts regarding electric assistance programs, the retail electricity supply market, and energy efficiency programs.
 - Make energy efficiency programs more accessible to low-income, moderate-income, and small business ratepayers, including renters.
 - Any other methods that may improve the affordability of electricity.

In the Act creating the Low-Income Assistance Program (LIAP) program (P.L. 1997, Ch. 316, An Act to Restructure the State's Electric Industry), the Maine legislature set the following policy:

A. In order to meet legitimate needs of electricity consumers who are unable to pay their electricity bills in full and who satisfy eligibility criteria for assistance and recognizing that electricity is a basic necessity to which all residents of the State should have access, it is the policy of the State to ensure adequate provision of financial assistance.

The Legislature's 2022 creation of the Electric Ratepayer Advisory Council (Council) recognized that there are still unmet low-income electric ratepayer assistance needs; that is, a gap between what assistance is needed and what assistance is available. The Electric Ratepayers Advisory Council Act states:

B. The Council shall make recommendations to the Public Advocate regarding methods to ensure that ratepayers are able to afford electricity in the state.

These mandates recognize that, ideally, financial assistance would be available to ensure the electric bill did not exceed the amount the ratepayer can afford to pay.

The Act created the Electric Ratepayer Advisory Council and specified its membership. The members were appointed by the Public Advocate to three-year terms. The following table lists the seats as specified in the Act and the person appointed to each seat along with the staff support provided as required by the Act from The Office of the Public Advocate (OPA) and the Maine Public Utilities Commission (PUC).

Seat as Described in Statute	Council Member	Organization	Title
Ex Officio (non-voting) Members:			
Public Advocate/OPA Designee	Bill Harwood	OPA	Public Advocate
Director of Governor's Energy Office	Dan Burgess	GEO	Director
Public Utility Commission Chair/PUC Designee	Phil Bartlett	PUC	Chairman
Director of Efficiency Maine Trust/EMT Designee	Ian Burnes	EMT	Director of Strategic Initiatives
Director of Maine State Housing Authority Designee	Erik Jorgensen	MaineHousing	Senior Director of Government Relations and Communications
Voting Members:			
Senior Citizens/Aging Population	Jess Maurer	Maine Council on Aging	Executive Director
Equal Justice Advocacy Org	Ann Danforth	Maine Equal Justice Partners	Policy Advocate
Community Action Agency	Claire Berkowitz	Midcoast Maine Community Action	President/CEO
Statewide Affordable Housing Advocate	Amy Racine	Saco Falls Management	Director of Property Management
Central Maine Power	Linda Ball	CMP	Vice President, Customer Service
Versant	Lisa Henaghen	Versant	Manager, Billing & Payment
Consumer Owned Utility Representative	Amy M. W. Turner	Fox Islands Electric Cooperative	CEO

Seat as Described in Statute	Council Member	Organization	Title
Large Industrial Employer	Shawn Lovley	Pineland Farms Potato Co.	Plant Manager
Research Organization (Economic)	Sharon Klein	University of Maine	Associate Professor
Central Maine Power Customer	Tina Riley	Citizen	CMP Customer
Versant Customer	John Fitzpatrick	Citizen	Versant Customer
Small Business Owner	Kim Brackett	Brackett's Market (Bath)	Owner
Federally Recognized Tribal Representative	Reese Chavaree	Penobscot Nation	Community Services Coordinator
Staff:			
Office of the Public Advocate	Benjamin Frech	OPA	Senior Assistant to Public Advocate
Public Utilities Commission	Deirdre Schneider	PUC	Legislative Liaison

2023 ACTIVITIES

- The Public Advocate and Council worked toward implementation of the 2022 recommendations with many successes as noted above.
- The Council met nine times for updates on the 2022 recommendation implementation progress, planning for the 2023 Report, review of the Sage Consultants' 2023 best practices study, and development of 2023 recommendations.
- The voting members of the Council reviewed and approved this 2023 Report.

SAGE MANAGEMENT CONSULTANTS, LLC

**LOW-INCOME ELECTRIC ASSISTANCE PROGRAM
BEST PRACTICES STUDY
AND ASSISTANCE GAP UPDATE**

FOR THE

**STATE OF MAINE
OFFICE OF THE PUBLIC ADVOCATE**



AND THE

ELECTRIC RATEPAYER ADVISORY COUNCIL

December 1, 2023

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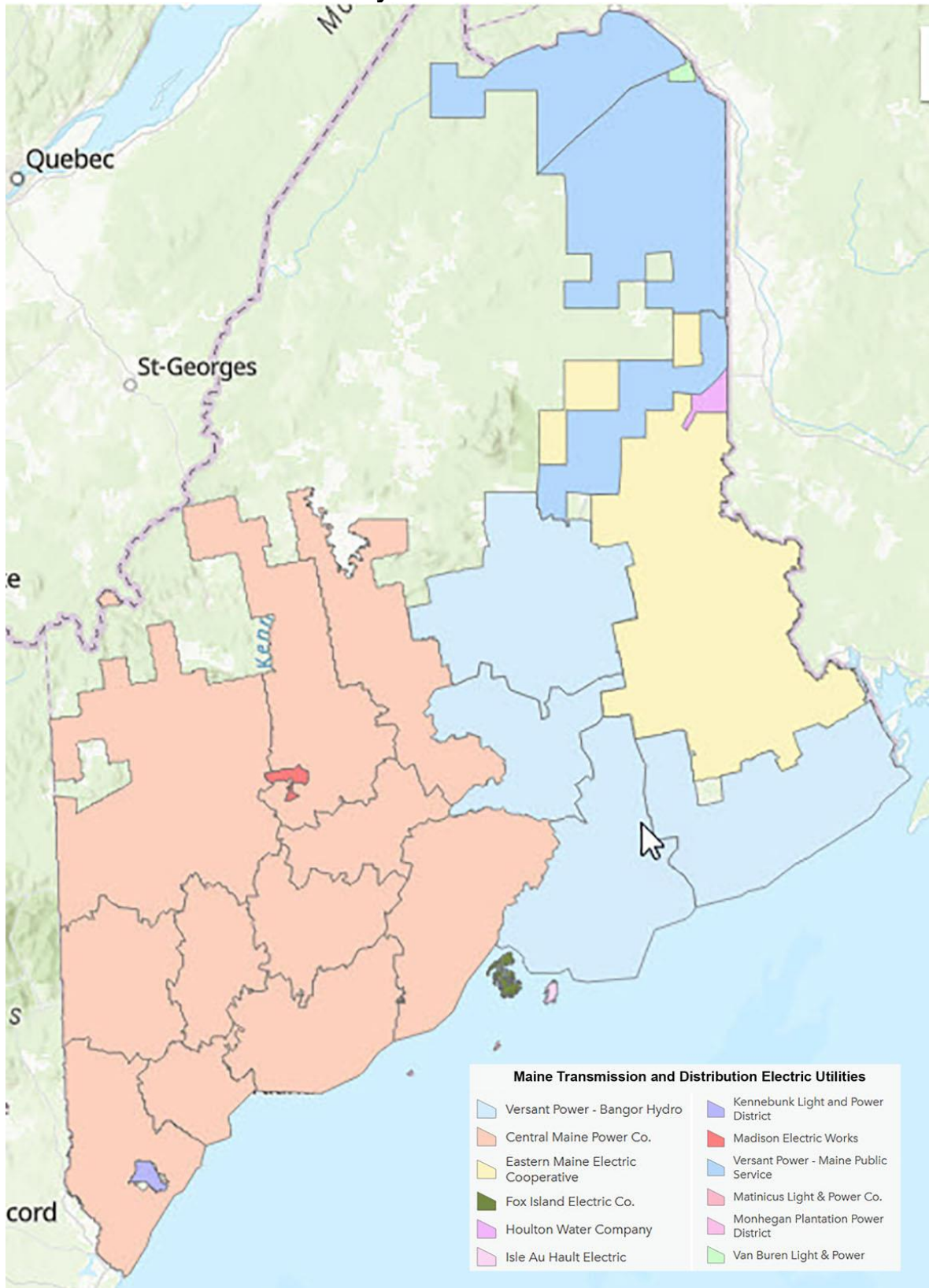
I. BACKGROUND

The Maine Office of the Public Advocate (OPA) and the Electric Ratepayer Assistance Council (ERAC) commissioned SAGE Management Consultants, LLC (SAGE) to conduct a 2023 Best Practices Study of other states' electric ratepayer assistance programs and to update the assistance gap in Maine, that is, the difference between the amount of assistance needed by low-income ratepayers and the assistance available. SAGE previously assisted the ERAC with its 2022 annual report.

A. ELECTRIC UTILITIES

According to the Maine Public Utilities Commission (PUC) website, there are 11 electric transmission and distribution utilities in Maine. Two are investor owned (one with two non-contiguous districts) and nine are consumer owned (three cooperatives and six municipal or plantation). Following is a map of the utilities' service territories as shown on the PUC website.

Utility Service Territories



B. ELECTRICITY SUPPLY

Residential electric customers in Maine may choose to have their electricity supplied through the PUC administered standard offer or from Competitive Electricity Providers (CEPs). Following is a table from the OPA website showing the standard offer and a representative sample of CEPs supplying electricity in Maine. The rates on this table are accurate as of October 4, 2023.

Competitive Electricity Provider Rates

Competitive Electricity Provider	Rate for CMP Customers (¢/kWh)	Rate for Versant (Bangor Hydro) Customers (¢/kWh)	Fixed Rate Term	Early Termination Fee
Residential and Small Commercial Standard Offer (PUC)	17.631	16.438	1/1/23 – 7/14/23	No
	16.631	15.438	7/15/23 – 12/31/23	
Ambit Energy	14.00	14.00	12 Months	No
	14.75	14.75	Ultimate Perks 12	
	19.50	19.50	Winter Break 12	
	19.75	19.75	Winter Break 24	
Clearview Energy	21.19	15.59	6 Months	\$150
	19.49	14.89	12 Months EV Charging Incentives	
C.N. Brown Electricity	14.20	14.20	12 Months	No
	15.20 (100%)	15.20 (100%)	12 Months GreenChoice	
Electricity Maine	14.99	15.49	12 Months	No
	15.49 (100%)	15.75 (100%)	12 Months GreenChoice	
Major Energy	13.99	13.99	12 Months	No
North American Power	13.59	13.39	10 Months	No
	13.29	12.99	12 Months	
SmartEnergy	13.80	13.00	12 Months	No
XOOM Energy	13.49	13.49	12 Months	No
	13.99	13.49	24 Months	
	16.49 (50% Green)	16.49 (50% Green)	Variable	

Source: <https://www.maine.gov/meopa/electricity/electricity-supply>

C. RESIDENTIAL ELECTRIC RATES

The following table lists each of the utilities and their number of residential customers, the percentage of the total state residential load, the number of kWh provided, the rate components, and the total rate as of July 31, 2023.

Maine Residential Electric Utilities, Residential Customers, and Rates

RESIDENTIAL ELECTRICITY RATES IN MAINE As of July 1, 2023									
Utility	Number of Customers (Residential) ²	% of State Residential Load	kWh ³	Delivery Rates				Standard Offer Rate (¢/kWh)	2023 Total Rate (¢/kWh)
				Distribution (¢/kWh)	Transmission (¢/kWh)	Stranded Cost (¢/kWh)	Total Delivery (¢/kWh)		
INVESTOR-OWNED UTILITIES									
Central Maine Power	605,052	80.0%	4,053,651,315	6.6	3.8	1.0	11.4	16.6	28.0 ¢/kWh
Versant Power-BHD	135,497	12.6%	639,905,091	8.7	4.4	1.7	14.8	15.4	30.2 ¢/kWh
Versant Power-MPD	37,449	3.8%	194,466,683	8.5	2.6	1.1	12.2	14.9	27.1 ¢/kWh
COOPERATIVES and MUNICIPAL-OWNED UTILITIES									
Eastern Maine Electric Cooperative	12,614	1.2%	60,364,172			N/A	9.0	5.9	14.9 ¢/kWh
Houlton	5,360	0.6%	32,476,052			N/A	6.3	6.2	11.4 ¢/kWh
Van Buren	1,481	0.2%	7,743,352			N/A	6.3	6.2	12.5 ¢/kWh
Kennebunk Light & Power	6,307	1.1%	54,353,402			N/A	2.1	10.4	12.5 ¢/kWh
Madison Electric Works	2,525	0.4%	19,130,590			N/A	5.8	7.7	13.5 ¢/kWh
Matinicus	128	0.0%	217,334	Exempt from Standard Offer requirements					49.2 ¢/kWh
Monhegan	135	0.0%	369,248	Exempt from Standard Offer requirements					75.2 ¢/kWh
Fox Island	1,940	0.1%	7,356,821			N/A	20.8	18.2	39.0 ¢/kWh
Isle au Haut	134	0.0%	182,040			N/A	15.2	16.8	32.0 ¢/kWh
Total Residential Customers	808,622								
STATE AVERAGE	N/A	100.0%	5,070,216,100						¢/kWh

¹ Standard Offer rates effective July 15, 2023.

² Information provided for each utility for rates effective July 1, 2023.

³ Rates as of December 2022. July information will be provided as it becomes available.

⁴ Information will be updated as it becomes available.

The table shows that 808,622 residential ratepayers consumed 5.1 billion kWh. This is an average of 6,270 kWh per year or 522.5 kWh per month per residential ratepayer.

The following table shows that the total residential rates increased substantially for the investor-owned utilities from December 31, 2021, to July 31, 2023. The December 31, 2021, rates were first reported in the 2022 ERAC annual report.

Changes in Investor-Owned Utility Total Residential Rates

Utility	Percent of State Residential Load	December 31, 2021 Total Residential Rate (Cents/kWh)	July 31, 2023 Total Residential Rate (Cents/kWh)	Percent Change
INVESTOR-OWNED UTILITIES				
Central Maine Power	80.0%	21.2	28.0	32.1%
Versant Power – Bangor Hydro District	12.6%	23.3	30.2	29.6%
Versant Power – Maine Public District	3.8%	20.4	27.1	32.8%
COOPERATIVES and MUNICIPAL-OWNED UTILITIES				
Eastern Maine Electric Cooperative	1.2%	17.3	14.9	-13.9%
Houlton	0.6%	11.8	11.4	-3.4%
Van Buren	0.2%	12.1	12.5	3.3%
Kennebunk Light & Power	1.1%	13.3	12.5	-6.0%
Madison Electric Works	0.4%	15.5	13.5	-12.9%
Matinicus	0.0%	50.2	49.2	-2.0%
Monhegan	0.0%	69.1	75.2	8.8%
Fox Island	0.1%	33.0	39.0	18.2%
Isle au Haut	0.0%	47.3	32.0	-32.3%
Calculated Weighted Average Rate for All Utilities (Cents/kWh)		27.7		
* Percent of load times the total rate for each investor-owned utility.				

The amount of change in total rates for utility customers ranged from a negative 32.3% to positive 32.8% from 2021 to 2023. However, for the investor-owned utilities that account for 96.4% of the residential customers and load in Maine, the increases ranged from 29.6% to 32.8%.

The weighted average total rate for all utilities is 27.7 cents per kWh. The average residential consumption of 6,270 kWhs times the weighted average rate of 27.7 cents per kWh produces an annual average residential electric customer cost of \$1,737, or \$145 per month.

D. LOW-INCOME ELECTRIC RATEPAYER ASSISTANCE

The Maine electric Low-Income Assistance Program (LIAP), also known as the Electric Lifeline Program (ELP) in the Central Maine Power (CMP) territory, is a state program providing assistance with electric bills to low-income electric ratepayers. Each utility is assessed a proportionate share of the total LIAP funding amount set by the PUC according to its percentage of residential ratepayers in the state. Each utility is then apportioned part of the total funding according to its percentage of LIAP eligible participants. Utilities with larger percentages of the State's residential customers are assessed more, and utilities with smaller percentages of the LIAP eligible customers are

apportioned less, and vice versa. Utilities recover the assessed amounts in rates set during regular rate cases.

Each year in February or March, the PUC opens a docket to determine the assessment and apportionment amounts for the upcoming LIAP year, which runs from October 1 through September 30. The assessment levels are set by April 1 based on the standard offer electric rates in effect at that time. However, the standard offer rates are reset as of January 1 of each year and may be more or less than the standard offer rates used to set the assessment levels.

ASSISTANCE

There is a LIAP benefit calculation model used by utilities other than CMP that intends to provide benefit amounts based on need. Higher benefit amounts are provided to lower-income ratepayers and lower benefit amounts are provided to higher-income ratepayers. The PUC standard benefit tiers are based on the percentage of income compared to the federal poverty threshold:

- 0 – 75%
- 76 – 100%
- 101 – 125%
- 126 – 150%

CMP uses its own benefit formula based on income level and usage amount. Inputs into the model include the rates charged for service, the average usage for low-income customers in the utility's service area, the income level of the participant, and an electricity affordability amount of four percent of total annual income.

ELIGIBILITY

LIHEAP eligible [up to 150% of the federal poverty level (FPL)] households are also eligible for LIAP. Also, as of October 1, 2022, households participating in a Department of Health and Human Services (DHHS) program (e.g., Supplemental Nutrition Assistance Program or Medicaid) with a household income of 75% of the FPL or less became qualified for LIAP. The DHHS client eligibility increased to 150% of the FPL for the 2024 program year.

PARTICIPATION, FUNDING, AND BENEFITS

LIAP participation and funding increased substantially from the 2022 to 2023 program years as shown in the following table.

LIAP Participants and Funding

Factor	2022	2023
LIAP Participants	27,123	38,091
LIAP Funding	\$7.8 Million	\$15.0 Million
Average Funding per Participant*	\$288	\$360
* LIAP uses tiered benefit program with lower income participants receiving more benefits proportionately than higher income participants.		
Source: LIAP Reports, 2022 year end and 2023 year end		

The number of LIAP participants increased by 10,968 from 27,123 in 2022 to 38,091 in 2023, a 40.4% increase. The LIAP funding almost doubled from \$7.8 million in 2022 to \$15.0 million in 2023. This increased funding allowed the average benefit to increase by 25% from \$288 in 2022 to \$360 in 2023 despite the large increase in participants.

In the 2023 LIAP program year, Maine DHHS clients at or below 75% of the FPL, which totaled 21,629 households, were invited to join LIAP by letter. This was in addition to the regular qualification for LIAP by qualifying for LIHEAP at 150% or less of the FPL. The utilities estimate that this DHHS linked program added approximately 2,800 participants of the 10,968 new participants in 2023 (38,091 2023 participants minus 27,123 2022 participants). It is likely that the other 8,168 new LIAP participants were motivated to join LIAP by the significantly higher electricity prices in 2023.

The 2024 and 2025 program year funding will increase with the addition of \$7.5 million in temporary funding from taxpayers. The PUC set LIAP funding for 2024 will remain at \$15 million, meaning the total 2024 funding will be \$22.5 million.

LIAP BENEFITS BY FPL CATEGORY

Across all utilities (IOUs and COUs), of the 38,091 participants in 2023, 8,923, or 23.4%, had household incomes of 75% or less of the FPL. The remaining 29,168 participants had household incomes between 76% and 150% of FPL.

The table below displays the LIAP benefits by FPL category as reported for just the two IOUs for program years 2022 and 2023. The totals do not match the table above because they exclude COUs and because of timing and other reporting differences.

LIAP Benefits by FPL Category

Program Year 2021–2022												
	Central Maine Power			Versant – Bangor Hydro District			Versant – Maine Public District			Totals		
FPL	Number of Participants	Benefits	Average Benefits	Number of Participants	Benefits	Average Benefits	Number of Participants	Benefits	Average Benefits	Number of Participants	Benefits	Average Benefits
0–75%	3,242	\$2,575,408	\$794	1,129	\$743,671	\$659	530	\$442,862	\$836	4,901	\$3,761,941	\$768
>75%	16,040	\$4,935,416	\$308	4,436	\$828,122	\$187	2,609	\$379,910	\$146	23,085	\$6,143,448	\$266
Total	19,282	\$7,510,824	\$390	5,565	\$1,571,793	\$282	3,139	\$822,772	\$262	27,986	\$9,905,389	\$354
Program Year 2022–2023												
0–75%	5,851	\$4,335,990	\$741	1,633	\$1,028,947	\$630	754	\$502,916	\$667	8,238	\$5,867,853	\$712
>75%	19,245	\$4,868,425	\$253	4,985	\$1,389,724	\$279	3,209	\$894,826	\$279	27,439	\$7,152,975	\$261
Total	25,096	\$9,204,415	\$367	6,618	\$2,418,671	\$365	3,963	\$1,397,742	\$353	35,677	\$13,020,828	\$365
PY Change	5,814	\$1,693,591	–\$23	1,053	\$846,878	\$83	824	\$574,970	\$91	7,691	\$3,115,439	\$11
Percent Change	30%	23%	–6%	19%	54%	29%	26%	70%	35%	27%	31%	3%

This table shows that the average benefits per participant varied significantly among the three reporting areas. In 2023, the average benefits for participants at 0 to 75% of the FPL ranged from \$630 in the Versant Bangor Hydro District to \$741 in the Central Maine Power District, a \$111 difference or 17.6%. For participants above 75% of the FPL, the range of average benefits was from \$279 in the two Versant Districts to \$253 in Central Maine Power, a \$26 difference or 10.3%.

II. LOW-INCOME ELECTRIC RATEPAYER ASSISTANCE PROGRAM BEST PRACTICES STUDY

In addition to assisting the Office of Public Advocate with the implementation of the 2022 recommendations, the Electric Ratepayer Assistance Council sponsored a targeted best practices study of low-income electric ratepayer assistance programs in other states and the development of updated recommendations for the Maine Low-Income Assistance Program (LIAP).

Several preliminary activities were conducted in preparation for the best practices study:

- A survey of Energy Assistance Funding Sources was reviewed. A summary of this survey is presented as Appendix A. The federal Low-Income Home Energy Assistance Program (LIHEAP) can apply to ratepayers with electric heat and is funded by federal taxpayers. State level low-income electric ratepayer assistance programs are primarily funded by ratepayers. Some states, like Maine currently, have additional assistance provided by taxpayers and most states have additional emergency-type assistance provided by charities.
- A survey of other states' targets for low-income electricity affordability was conducted. The affordability is stated as a percentage of household income that a low-income ratepayer can afford to pay for electricity. The results of the survey are presented in Appendix B. The surveyed states' targets for electricity affordability ranged from two percent in New Jersey up to ten percent for ratepayers with electric heat in Ohio.
- A review of publicly available information from the Public National Consumer Law Center, United States Department of Energy Office of State and Community Energy Programs, individual state Departments of Energy, and State Citizens Utility Boards was conducted for information relevant to the best practices survey topics for low-income electric ratepayer assistance programs. No directly relevant information was found. However, the Citizens Utility Board of Illinois published a comparison of the states which is summarized in the Panel of States section below.

A. PANEL OF STATES

Five states were selected for the best practices study- three other New England states, New Jersey, and Ohio. Vermont, New Hampshire, and Connecticut have similarities to Maine and are the New England states mentioned in the 2022 ERAC report. The 2022 ERAC report also identified New Jersey and Ohio as having innovative low-income electric ratepayer assistance programs.

The panel of states was first profiled through internet research as shown in the following tables.

Panel of States – Demographics

State	Population	Median Income	Per Capita Income	Percent at or Below the FPL
Maine	1,385,340	\$63,182	\$36,171	10.8%
Connecticut	3,626,205	\$83,572	\$47,869	9.8%
New Hampshire	1,395,231	\$83,449	\$43,877	7.2%
Vermont	647,064	\$67,674	\$37,903	10.4%
New Jersey	9,261,699	\$89,703	\$46,691	9.7%
Ohio	11,756,058	\$61,938	\$34,526	13.4%
Sources: https://www.census.gov/quickfacts/fact/table/ME/HSG010222 ; https://www.census.gov/quickfacts/fact/table/CT/PST045222 ; https://www.census.gov/quickfacts/NH ; https://www.census.gov/quickfacts/fact/table/VT/PST045222 ; https://www.census.gov/quickfacts/NJ ; https://www.census.gov/quickfacts/OH ?				

Panel of States – Energy Assistance Programs, State Administrative Agency, and Annual Amount of Funding

State	Program, State Administrative Agency	Federal Funded	State Funded	Ratepayer Funded
Maine	Program	LIHEAP		LIAP / Arrearage Management Program
	State Agency	MaineHousing		DHHS / MaineHousing
	Annual Funding	2023 \$53,964,957	State will add \$7.5 million of taxpayer funding to LIAP for 2024 and 2025	\$15 million for LIAP
	Source:	HHS block grant funding PDF	2022 ERAC Report	2022 ERAC Report
Connecticut	Program	LIHEAP (CEAP)		Systems Benefit Charge (SBC) “hardship customer costs” and arrearage. Operation Fuel (partial ratepayers)
	State Agency	Department of Social Services		
	Annual Funding	2023 \$116,642,257		SBC: Eversource: \$67.4M & United Illuminating: \$26.7M (2023)
	Source:	HHS 2023 block grant funding PDF		https://portal.ct.gov/OCC/Electricity/Electricity/Electricity

State	Program, State Administrative Agency	Federal Funded	State Funded	Ratepayer Funded
New Hampshire	Program	LIHEAP (Fuel Assistance Program)	Emergency Fuel Assistance	Electric Assistance Program (EAP)
	State Agency	Department of Energy		
	Annual Funding	2023 \$45,823,487		SBC: \$15-16M/year
	Source:	HHS block grant funding PDF	2022 NH bill HB2023	2022 SBC Report
Vermont	Program	LIHEAP (Seasonal Fuel Assistance)		Energy Assistance Program (EAP)
	State Agency	Department for Children and Families (DCF)		Green Mountain Power and Vermont Gas
	Annual Funding	2023 \$34,346,336		
	Source:	HHS block grant funding PDF		
New Jersey	Program	LIHEAP (HEAP)		Universal Service Fund (USF) USF Fresh Start (arrearage) through the Societal Benefits Charge (SBC)
	State Agency	Department of Community Affairs (DCF)		
	Annual Funding	2023 \$207,488,217		USF & Fresh Start: \$146M (2022)
	Source:	HHS block grant funding PDF		
Ohio	Program	LIHEAP (HEAP)		Percentage of Income Plan (PIPP) & PIPP Plus. Now called the Universal Service Fund.
	State Agency	Department of Development		Department of Development
	Annual Funding	2023 \$255,708,365		
	Source:	HHS block grant funding PDF		NJBPU 2G Order 2022-2023 USF

Panel of States – Regulator, Consumer Advocate, and Largest Electric Utilities

State	Regulator	Consumer Advocate	Largest Utility	Second Largest Utility
Maine	Public Utilities Commission (MPUC)	Office of the Public Advocate	Central Maine Power	Versant Power
Connecticut	Public Utilities Regulatory Authority (PURA)	Office of Consumer Counsel	Eversource	United Illuminating Company
New Hampshire	Public Utilities Commission (NHPUC)	Office of the Consumer Advocate	Eversource	Unitil
Vermont	Public Utility Commission (PUC)	Attorney General's Office Consumer Protection Unit	Green Mountain Power	Burlington Electric Co-op
New Jersey	Board of Public Utilities (NJBPU)	Division of Consumer Affairs	Public Service Electric & Gas Co (PSE&G)	Jersey Central Power & Light (JCP&L)
Ohio	Public Utilities Commission of Ohio (PUCO)	Ohio Consumer's Counsel	AEP Ohio	Duke Energy

Source: Internet research

Panel of States – Citizens Utility Board of Illinois Comparative State Data

State	Ranking (Best to Worst)	Affordability Average	Reliability Average	Environmental Average	Average Rank
Alabama	45	37.7	39.5	23.3	33.5
Alaska	50	42.2	38.3	34.0	38.2
Arizona	7	29.8	4.0	19.8	17.9
Arkansas	38	18.0	42.7	29.3	30.0
California	22	32.8	21.8	17.3	24.0
Colorado	6	13.2	14.0	24.7	17.3
Connecticut	42	47.0	27.2	21.6	31.9
Delaware	29	30.3	21.7	33.1	28.4
District of Columbia	3	13.0	5.5	31.0	16.5
Florida	25	30.0	13.2	33.8	25.7
Georgia	44	35.3	34.0	30.0	33.1
Hawaii	40	43.8	16.0	32.8	30.9
Idaho	17	12.8	35.7	18.3	22.3
Illinois	5	16.7	14.8	19.3	16.9
Indiana	43	31.0	27.3	39.9	32.7
Iowa	20	22.2	29.7	19.2	23.7
Kansas	12	28.8	11.5	19.4	19.9
Kentucky	35	20.0	25.3	42.2	29.2
Louisiana	47	18.0	47.0	37.7	34.2
Maine	39	29.0	44.7	18.8	30.8
Maryland	16	33.7	10.8	22.0	22.2
Massachusetts	48	42.3	34.0	28.1	34.8
Michigan	46	33.0	37.5	30.3	33.6
Minnesota	8	20.3	12.8	21.2	18.1
Mississippi	49	28.3	44.5	35.1	36.0
Missouri	24	22.2	16.3	37.7	25.4
Montana	15	14.5	29.2	22.6	22.1
Nebraska	10	16.5	10.2	29.9	18.9
Nevada	2	19.7	4.3	22.2	15.4
New Hampshire	36	38.2	33.3	16.3	29.3
New Jersey	23	26.2	27.7	21.3	25.1
New Mexico	13	17.3	21.5	23.7	20.8
New York	19	32.7	22.5	13.8	23.0
North Carolina	26	21.5	35.3	23.8	26.9
North Dakota	11	20.3	10.2	28.9	19.8
Ohio	37	21.3	29.0	37.7	29.3
Oklahoma	28	21.0	43.0	19.2	27.7
Oregon	9	15.0	26.8	13.7	18.5
Pennsylvania	31	33.7	26.0	27.1	28.9
Rhode Island	41	41.8	24.8	26.2	31.0
South Carolina	27	33.7	27.8	20.6	27.4
South Dakota	4	27.8	9.2	13.3	16.8
Tennessee	32	28.8	35.8	22.7	29.1
Texas	33	25.5	34.0	28.0	29.2
Utah	18	4.7	28.2	34.1	22.3
Vermont	33	38.0	34.5	15.0	29.2
Virginia	30	23.7	33.3	29.2	28.7
Washington	1	8.7	26.3	10.4	15.1
West Virginia	51	30.8	45.3	42.3	39.5
Wisconsin	14	19.7	13.7	32.6	22.0
Wyoming	21	13.2	24.2	34.1	23.8
Source: https://www.citizensutilityboard.org/wp-content/uploads/2022/09/Electric-Utility-Performance-Report-Second-Edition-final.pdf					

B. BEST PRACTICES SURVEY

A set of topics was developed for the best practices survey of other states' assistance programs for low-income electric ratepayers. The Low-Income Home Energy Assistance Program (LIHEAP) was excluded as it is a federal program, and all states surveyed implement it in a similar manner complying with federal guidelines. Also, in Maine, LIHEAP is primarily used for fuel oil, natural gas, and other non-electric heating fuels. Only state-level low-income electric ratepayer assistance programs, like LIAP, were surveyed.

The states low-income electric ratepayer assistance program surveyed for comparison to Maine's LIAP were:

- Connecticut Low-Income Discount Rate (LIDR)
- New Hampshire Energy Assistance Program (EAP)
- Vermont Energy Assistance Program (EAP)
- New Jersey Universal Service Fund (USF)
- Ohio Percentage of Income Payment Plan (PIPP) Plus

The topics surveyed for each state low-income electric ratepayer assistance program included:

- Overview of the Program
- Organization Roles
- Assistance Available
- Current Funding and Source(s)
- Future Changes to Funding and Source(s)
- Eligibility
- Qualification Process
- Enrollment and Reenrollment Process
- Number of Ratepayers Eligible
- Number of Participants
- Affordability Target
- Benefit Calculation
- Achievement of Affordability Target
- Outreach Efforts
- Annual Administrative Cost/FTEs/Level of Effort
- Manual Processes

The survey for each state began with research of publicly available information on each topic followed by interviews with representatives of organizations in each state who were knowledgeable about the program. The organizations interviewed varied by state but included regulatory commissions, public advocates, and utilities.

III. BEST PRACTICES STUDY CONSIDERATIONS AND RECOMMENDATIONS FOR MAINE

A. BEST PRACTICES CONSIDERATIONS FOR MAINE

A summary of the research and interviews for each survey topic for each state program is presented in Appendix C. A further summary of the range of practices of state low-income electric ratepayer assistance programs and potential options considered by the Council for the Maine LIAP follows.

Range of State Practices and Potential Options Considered for Maine LIAP

Topic	Range of State Practices	Potential Options Considered for Maine LIAP
Organization Roles	<ul style="list-style-type: none"> In all states surveyed, regulatory commissions oversee the programs. Ohio and New Hampshire also have separate program advisory boards. In New Hampshire, Vermont, Ohio, and New Jersey, a state agency other than the commission administers the program. In all states, the utilities implement the programs. New Jersey has one state agency that provides all oversight and administrative services utilizing state employees including a single information system and database that all parties utilize. 	<ul style="list-style-type: none"> Streamlining the number of agencies involved. Developing one statewide information system for program administration and operation. Evolving ERAC into a LIAP advisory board.
Assistance Available	<ul style="list-style-type: none"> All surveyed states, like Maine, have fixed total funding for benefits each year. Unlike Maine's fixed dollar budget apportionment amount, the states other than Vermont have a fixed charge per kWh. Vermont has a fixed fee per month for each customer class. However, the total benefit amount varies based on the 	<ul style="list-style-type: none"> Converting from a fixed apportionment amount to a consistent charge per kWh or customer class across all utilities. Implementing an annual true up mechanism with the utilities that allows provision of full scheduled benefits to all participants.

Topic	Range of State Practices	Potential Options Considered for Maine LIAP
	<p>number of participants and energy costs.</p> <ul style="list-style-type: none"> All surveyed states except New Hampshire have annual true ups with the utilities that allow funding to be increased to provide full scheduled benefits to all participants. 	
Benefit Caps	<ul style="list-style-type: none"> New Jersey – \$180 per month for electric and gas total. Connecticut – 800 kWh non-heating; 1,200 kWh heating. New Hampshire – 750 kWh. Ohio and Vermont have no caps. 	<ul style="list-style-type: none"> Setting kWh or dollar benefit caps to control program costs with referrals to funded energy counseling and energy efficiency programs for participants who exceed the caps.
Affordability Targets	<ul style="list-style-type: none"> Electricity affordability targets (percentage of household income) range from 2% in New Jersey to 6% in New Hampshire for non-electric heating and 4% in New Jersey to 10% in Ohio for electric heating. Vermont is the only state that does not have an affordability target. It simply provides a 25% discount for participants up to 185 % of FPL. 	<ul style="list-style-type: none"> Lowering the electricity affordability target less than the current 4% after the 4% target has been achieved to provide greater assistance to low-income ratepayers. Increasing the electric affordability target above 4% if funding is not available to achieve the 4% target.
Benefit Delivery	<ul style="list-style-type: none"> All states surveyed provide a consistent monthly benefit on the electric bill. The discount is usually on the electric commodity cost, but Connecticut includes the customer charge as well. Ohio and New Jersey have a percentage of income program in which the participant pays the affordable amount of the household income, 2% in NJ and 5% in Ohio, and the benefit is the remainder of the total bill. 	<ul style="list-style-type: none"> Implementing a monthly, consistent discount benefit on the electric commodity, and, possibly, the customer charge, or the total bill. Implementing a percentage of income program in which the ratepayer pays the affordable amount, and the benefit is the remainder of the total bill.

Topic	Range of State Practices	Potential Options Considered for Maine LIAP
Affordability Target Achievement	<ul style="list-style-type: none"> ▪ All states except New Hampshire achieve the affordability target, on average, up to the program caps, through the annual funding true ups with the utilities. ▪ New Hampshire has temporary taxpayer funding to make up the funding difference. ▪ Connecticut and Vermont have tiered discounts that achieve the affordability target, on average, for each tier. ▪ Ohio and New Jersey have percentage of income plans that customize the benefit for each participant to achieve the affordability target more precisely. 	<ul style="list-style-type: none"> ▪ Implementing an annual true up mechanism with the utilities that allows provision of full scheduled benefits to all participants. ▪ Replacing the current tiered system of benefits with a percentage of income program that achieves the targeted affordability for each participant.
Funding Sources	<ul style="list-style-type: none"> ▪ All programs are ratepayer funded, either by a charge per kWh or by a fee per customer class. ▪ New Hampshire, like Maine, added temporary taxpayer funds to the program to account for the high electricity prices. 	<ul style="list-style-type: none"> ▪ Using taxpayer funding to make up any shortfalls from ratepayer funding to provide full scheduled benefits for all participants.
Eligibility	<ul style="list-style-type: none"> ▪ Eligibility ranges from 60% of State Median Income in three states up to a high of 185% of the FPL in Vermont. ▪ New Jersey also has automatic enrollment for Supplemental Nutrition Assistance Program (SNAP) and Lifeline rate participants. ▪ Connecticut has automatic enrollment for financial hardship ratepayers. ▪ Vermont, like Maine, offers participation to other health and 	<ul style="list-style-type: none"> ▪ Increasing eligibility to 185% of FPL. (It has been raised to 150% for the current program year.) ▪ Automatic enrollment for SNAP, Medicaid, and other health and human service program participants which determine household income with an opt-out provision for each eligible ratepayer.

Topic	Range of State Practices	Potential Options Considered for Maine LIAP
	human services program participants.	
Qualification Process	<ul style="list-style-type: none"> All states except New Jersey use contractors to qualify participants, often in conjunction with applications for other assistance programs. New Jersey uses state employees to qualify participants. Qualification can be in-person, by telephone, mail, online, or home visits for home bound participants. 	<ul style="list-style-type: none"> Ensuring that qualification is available to all potential participants in-person, by telephone, mail, online, or home visits. Only piggy-backing on qualification for other low-income programs such as LIHEAP, SNAP, Medicaid, and other household income and size qualified social programs. This would eliminate the need for a separate LIAP qualification and requalification process.
Benefit	<ul style="list-style-type: none"> Vermont simply provides a 25% discount on the electric commodity bill to all participants. New Hampshire has a more complex system with five electric commodity discount tiers ranging from 8% to 76% depending on household income. Connecticut uses two tiers that still meet the affordability target, on average, for all participants. New Jersey and Ohio have percentage of income plans that customize the benefit for each participant. 	<ul style="list-style-type: none"> Simplifying the current tier structure to make it easier to communicate, understand, and implement but still meet the affordability target for participants, on average. Replacing the tiered structure with a percentage of income plan that customizes the benefit for each participant.
Enrollment and Reenrollment Process	<ul style="list-style-type: none"> Enrollment is annual for all surveyed states. Reenrollment is annual except for New Hampshire that allows 60 years old and above participants to reenroll every two years and Vermont that 	<ul style="list-style-type: none"> Extending reenrollment for fixed income seniors to five years.

Topic	Range of State Practices	Potential Options Considered for Maine LIAP
	allows seniors to reenroll every three years.	
Ratepayers Eligible and Participation Rate	<ul style="list-style-type: none"> In general, states do not know the number of ratepayers eligible for the program and therefore do not know the participation rate, but it is estimated to be, like Maine, low, in the 20% to 30% range. 	<ul style="list-style-type: none"> Working with DHHS to identify all potential participants who have qualified for other assistance programs and targeting outreach to individual ratepayers who may be eligible.
Outreach Efforts	<ul style="list-style-type: none"> State agency efforts include website information, social media, broadcast television, streaming advertising, and promotions at public events. State agencies and CAAs also promote the electricity assistance programs when contacted for other assistance programs. Utilities promote electricity assistance programs with customers struggling to pay their bills through their websites, mailings, and contact centers. There is a general consensus that eligible ratepayers are aware of the electricity assistance programs. There is also a general consensus that it is unknown why many eligible ratepayers do not apply for the assistance. 	<ul style="list-style-type: none"> Conducting a survey to determine program awareness level among eligible households and why many eligible ratepayers do not apply for assistance. Modifying outreach efforts to improve awareness, as necessary. Modifying the application process to encourage participation, such as by piggybacking on other assistance program applications and having multiple avenues to apply (in-person, mail, online, and home visits).
Annual Administrative Costs	<ul style="list-style-type: none"> Regulatory agencies are not reimbursed by the programs. State agencies are reimbursed for their costs by the programs. Utilities are fully reimbursed either by the assistance program, general rate cases, a rider, or a combination of these. 	<ul style="list-style-type: none"> Increasing CAA reimbursements to fully fund program outreach, outbound calls to potentially eligible ratepayers, financial counseling, and energy efficiency referrals. Adding incentive payments for

Topic	Range of State Practices	Potential Options Considered for Maine LIAP
	<ul style="list-style-type: none"> Contractors are reimbursed for expenses by the program or, in Connecticut, an incentive payment for each participant enrolled. 	each participant enrolled to increase participation.
Manual Processes	<ul style="list-style-type: none"> Application information is manually entered into an information system. New Jersey has added artificial intelligence that can enter scanned information automatically. Communication among the agencies, CAAs, and utilities varies from emailed Excel spreadsheets to a fully integrated single system in New Jersey. Individual information systems used by each party in states other than New Jersey reduce manual efforts but are costly to modify. 	<ul style="list-style-type: none"> Developing one modern system for all parties to use with as much AI as practical to reduce manual efforts. Alternatively, piggybacking on other household income and size qualified programs to eliminate a separate LIAP application process.
Future Changes	<ul style="list-style-type: none"> No significant planned future changes were discovered. However, the Connecticut program is new and will begin in 2024. 	

This information was considered in the context of the Council's goals for LIAP and the 2022 recommendations for LIAP as follows.

B. BEST PRACTICES SURVEY CONSIDERATIONS FOR LIAP GOALS

Following are best practices study ideas in the context of the seven goals for Maine low-income electric ratepayer assistance:

- Fund assistance as much as possible, up to fully funding all low-income ratepayers' assistance needs.

New Jersey, Ohio, Connecticut, and Vermont fully fund the ratepayer assistance for ratepayers up to the program caps with annual true ups with the utilities.

New Jersey and Ohio customize the benefit to achieve the electric affordability target more precisely for each participant through their percentage of income programs.

New Jersey has a more generous affordability target of 2% each for electric and gas.

- All low-income ratepayers are offered a chance to participate in the programs.

Connecticut and New Jersey have better linkages with parallel Human Services programs like the Supplemental Nutrition Assistance Program and Medicaid for enrollment in electric assistance programs.

However, all states reported unknown or low participation rates despite eligible ratepayers being aware of the program.

- Enrollment in the program and annual requalification is easy for the participant.

Connecticut and New Jersey have better linkages with parallel Human Services programs like the Supplemental Nutrition Assistance Program and Medicaid for enrollment in electric assistance programs.

New Hampshire and Vermont have two- or three-year requalification for seniors rather than every year.

New Jersey and Ohio offer applications by in-person interviews, mail, internet, telephone, or home visit.

- If full funding of all assistance needed is not possible, lower income ratepayers would get proportionately greater benefits than higher income ratepayers.

All states except Vermont have tiered or customized benefits to provide income-adjusted assistance to participants.

All surveyed states except New Hampshire provide full funding of scheduled program benefits through annual true ups with the utilities. New Hampshire has current temporary taxpayer funding to make up the difference.

- Reductions in electricity usage are encouraged through energy efficiency education, referrals to energy efficiency programs, and price signals to reduce inefficient usage.

Connecticut, New Hampshire, and New Jersey have usage or dollar caps on the benefit. New Hampshire refers higher usage participants to energy efficiency programs.

- Program design is administratively efficient; that is, as much assistance funding as possible goes to the participants, rather than to administering the program.

New Jersey has one state-run information system for the program that is used by all parties – the government agencies, utilities, and participants.

- Alternative funding sources (other than ratepayer) should be explored and implemented.

One state, New Hampshire, like Maine, supplemented the ratepayer funded program with taxpayer funds for two years.

Vermont has a flat rate per customer class for funding rather than the typical percentage of the kWh consumption bill.

All surveyed states charge all customer classes to fund the residential program.

C. BEST PRACTICES SURVEY CONSIDERATIONS FOR 2022 LIAP RECOMMENDATIONS

1. Make Low-Income Assistance Program (LIAP) benefits monthly rather than one or two lump sum credits per year.

All other states surveyed apply the benefits monthly.

2. Simplify the LIAP benefit from a variable allocated annual dollar credit benefit to a consistent percentage discount on the participant's total monthly bill.

All other states surveyed provide a consistent monthly benefit.

3. Provide higher benefits for lower incomes.

All states except Vermont have a sliding scale based on household income level.

4. Increase Department of Health and Human Services (DHHS) program LIAP eligibility to include DHHS client households with incomes equal to or less than 150% of the federal poverty guidelines.

Ohio offers participation up to 175% of FPL and Vermont offers participation up to 185% of FPL.

5. Make LIAP enrollment automatic for DHHS clients with household incomes equal to or less than 150% of the FPL with an opt-out provision.

New Jersey has auto enrollment from SNAP and Lifeline rates. Connecticut has automatic enrollment for financial hardship ratepayers.

6. Make LIAP annual requalification automatic in the enrollment month.

States send requalification letters before enrollment month.

New Hampshire and Vermont have two- or three-year requalification for seniors.

7. Set up an annual adjustment mechanism to allow utilities to provide the full specified monthly discounts to each participant even if the total discounts exceed the budgeted funding in that program year.

All states surveyed except New Hampshire have annual true ups with the utilities that allow full payment of scheduled program benefits to all participants.

8. Apply LIAP discounts to current bills, not arrearages; encourage participants with arrearages to join the Arrearage Management Program (AMP).

All other states surveyed apply the assistance to current bills.

9. Reconsider the LIAP funding amount when the standard offer rate changes during each program year.

All surveyed states except New Hampshire have mechanisms to fully fund the targeted benefits for all participants each year.

17. Increase LIAP funding and add new funding sources to the current ratepayer funding of LIAP.

All surveyed states except New Hampshire have mechanisms to fully fund the targeted benefits for all participants each year. However, New Hampshire has temporary supplemental taxpayer funding currently.

D. UPDATED 2023 RECOMMENDATIONS FOR LIAP

Following are updates to each 2022 LIAP recommendation based on the best practices survey and experience to date.

2022 LIAP Recommendations	2023 LIAP Recommendations Update
1. Make LIAP benefits monthly rather than two lump sum credits per year.	<ul style="list-style-type: none">▪ Recommendation reiterated.▪ This recommendation is supported by all surveyed states providing consistent monthly benefits.
2. Simplify the LIAP benefit from a variable allocated annual dollar credit benefit to a consistent dollar discount on the participant's total monthly bill.	<ul style="list-style-type: none">▪ Simplify the LIAP benefit from a variable allocated annual dollar credit benefit to a consistent dollar or percentage discount on the participant's total monthly bill or the electric commodity cost.▪ This recommendation is supported by all surveyed states having this practice.
3. Provide higher benefits for lower incomes.	<ul style="list-style-type: none">▪ Convert LIAP to a percentage of income payment plan that accurately achieves the four percent affordability target for each program participant.▪ This recommendation is supported by the New Jersey and Ohio percentage of income payment plans. OR:▪ If the percentage of income payment plan is not implemented, set the discounts for each tier to achieve the 4% affordability target, on average, in each tier.▪ This recommendation is supported by Connecticut and New Hampshire which achieve their affordability targets, on average, in each tier.
4. Increase Department of Health and Human Services (DHHS) program LIAP	<ul style="list-style-type: none">▪ Recommendation reiterated.▪ This recommendation will be

2022 LIAP Recommendations	2023 LIAP Recommendations Update
eligibility to include DHHS client households with incomes equal to or less than 150% of the FPL.	implemented in the 2024 LIAP program year.
5. Make LIAP enrollment automatic for DHHS clients with household incomes equal to or less than 150% of the FPL with an opt-out provision.	<ul style="list-style-type: none"> ▪ Recommendation reiterated.
6. Make LIAP annual requalification automatic in the enrollment month.	<ul style="list-style-type: none"> ▪ Make annual requalification automatic in the enrollment month based on continued participation in the qualifying DHHS assistance program or LIHEAP. ▪ If requalification is not automatic, extend the period for requalification for fixed income seniors to multiple years. ▪ This recommendation is supported by New Hampshire and Vermont which have multi-year qualifications for fixed income seniors.
7. Set up an annual adjustment mechanism to allow utilities to provide the full specified monthly discounts to each participant even if the total discounts exceed the budgeted funding in that program year.	<ul style="list-style-type: none"> ▪ Recommendation reiterated. ▪ This recommendation is supported by all surveyed states except New Hampshire having annual true-ups to provide the full scheduled benefits to all participants.
8. Apply LIAP discounts to current bills, not arrearages; encourage participants with arrearages to join the Arrearage Management Program (AMP).	<ul style="list-style-type: none"> ▪ Recommendation reiterated. ▪ This recommendation is supported by all surveyed states applying benefits to the current monthly bills.
9. Reconsider the LIAP funding amount when the standard offer rate changes during each program year. AND: 17. Increase LIAP funding and add new funding sources to the current ratepayer funding of LIAP.	<ul style="list-style-type: none"> ▪ Increase the LIAP funding amount to achieve the four percent affordability target for all program participants. ▪ Make the current temporary taxpayer funding for LIAP permanent. ▪ Allocate the state electricity tax revenue to LIAP. ▪ Continue to explore possible funding sources for LIAP.

RESTATED LIAP RECOMMENDATIONS

These recommendations for LIAP build on the Council's 2022 LIAP recommendations.

1. Eventually achieve the four percent affordability target¹ for all LIAP participants with a payment plan in which each participant pays just the household four percent affordability amount and LIAP pays the rest. For example, a household with \$12,000 in annual household income would pay \$480 per year. LIAP would pay the rest of the bill to the utility. This requires full funding of the LIAP program to meet all participants' assistance needs at the four percent affordability target level. See Chapter IV for an estimation of the total funding needed to meet the four percent affordability target for all potential participants.
 - ◆ This means converting from an annual lump sum benefit scheme to consistent monthly payments for each participant.
 - ◆ This also means having one consistent payment calculation for all Maine utilities for each participant.
 - ◆ Additionally, this means that there would be no electricity usage or benefit dollar caps as those would mean the four percent affordability target is not met for high electricity usage participants.
2. In the interim until full LIAP funding is achieved, redesign LIAP discount benefit percentages for each tier to achieve an affordability target in each tier, on average, for all participants across all utilities to stay within the annual LIAP funding available.
 - ◆ This means setting an interim affordability target for each tier that best utilizes the available funds and provides higher benefits for lower-income participants and lower benefits for higher-income participants.
 - ◆ This also means having one consistent discount percentage for each tier for all Maine utilities so that the interim affordability target is achieved, on average, in each tier, for all participants across Maine.
 - ◆ Interim electricity consumption or total dollar benefit caps could also be utilized to stay within the available funding.
3. Implement a consistent charge per kWh for all ratepayers across all utilities to fund LIAP.
4. Convert to a monthly discount benefit in the interim rather than the current annual benefit so participants can have better visibility of their monthly costs and better control of their budgets. The benefit discount would be applied to the current bill rather than any arrearage.
5. Increase LIAP funding to enable the State to get closer to the four percent affordability target for each participant. Recommended sources of the additional funds include:

¹ Reevaluate the affordability target of 4% over time as beneficial electrification increases electric heating, the use of electric vehicles, and other increases in electricity usage, as usage and costs associated with other fuels decrease.

- ◆ Increasing the LIAP funding from ratepayers.²
 - ◆ Making the current temporary LIAP funding from taxpayers permanent and increasing the amount.
 - ◆ Allocating the state electricity tax revenue to LIAP funding.
6. Implement an annual true-up with each utility to ensure that they are fully reimbursed for all LIAP benefits and program costs. Each utility would collect the state-wide consistent LIAP charges from each of their non-LIAP ratepayers and provide the state-wide consistent discounts specified by LIAP to each of their LIAP participants. At the end of each year, the differences between LIAP collections and LIAP costs (LIAP benefits and program costs) at each utility would be reconciled through a true-up process with the state (utilities remit overcollections to the state, and the state reimburses utilities for under-collections). The use of regulatory asset accounts at under-collected utilities would be used if there are state-wide under-collections in a year.
 7. Phase in automatic enrollment, with an opt-out provision, for all DHHS clients with household incomes at or below 150 percent of the FPL and all LIHEAP households. The lowest income households would come first and the higher income households would be added as additional funding becomes available. The current application and enrollment processes should be retained until automatic enrollment is implemented for all qualified participants. Annual reenrollment would be automatic as well with confirmation from DHHS or MaineHousing that the participant still meets the qualifications.
 8. Accommodations for the consumer owned utilities (COUs) that have fewer resources should be made in the implementation of these recommendations. Examples of accommodations might include extra time to implement any changes, advance funding from the state (e.g., taxpayer funds or prior year overcollections) to cover benefit discounts that exceed collections, and quarterly rather than monthly benefits.

These recommendations are consistent with Maine policies and initiatives on climate change, beneficial electrification, and clean energy.

² An Act to Create the Electric Ratepayer Advisory Council, Public Law 2021, chapter 623 (LD 1913), the legislation creating the Council, includes the language, “Identify methods to fund electric assistance programs that do not result in shifting costs to ratepayers.” This recommendation includes funding from taxpayers and allocating the electricity sales tax to LIAP in addition to increasing LIAP funding from ratepayers. We do not believe the statute prohibits increasing LIAP funding from ratepayers; it does require considering other alternatives, which are included here. The Best Practices Study found that the principal funding for all other surveyed states’ assistance programs was from ratepayers. New Hampshire was the only surveyed state that had temporary assistance program funding from taxpayers, like Maine.

IV. UPDATED LOW-INCOME RATEPAYER ASSISTANCE NEEDS

2023 LIAP PROGRAM YEAR PARTICIPATION AND FUNDING

As noted in Chapter I, LIAP participation and funding increased substantially from the 2022 to 2023 program years³ as shown in the following table.

LIAP Participants and Funding

Factor	2022	2023
LIAP Participants	27,123	38,091
LIAP Funding	\$7.8 Million	\$15.0 Million
Average Funding per Participant*	\$288	\$360
* LIAP uses tiered benefit program with lower income participants receiving more benefits proportionately than higher income participants.		
Source: LIAP Reports, 2022 year end and 2023 year end		

QUALIFIED RATEPAYERS

LIAP is open to ratepayers with 150% or less of the FPL for their household incomes. The FPL for a household varies by the number of household members, age, and members who are children as shown in the following table.

³ The LIAP program year runs from October through September. For example, the 2023 program year ended on September 30, 2023.

Poverty Thresholds for 2022 in Dollars by Size of Family and Number of Related Children Under 18 Years

Size of Family Unit	Related Children Under 18 Years								
	None	One	Two	Three	Four	Five	Six	Seven	Eight or more
One person (unrelated individual):									
Under age 65	15,225								
Aged 65 and older	14,036								
Two people:									
Householder under age 65	19,597	20,172							
Householder aged 65 and older	17,689	20,095							
Three or more people									
Three people	22,280	23,556	23,578						
Four people	30,186	30,679	29,678	29,782					
Five people	36,402	36,932	35,801	34,926	34,391				
Six people	41,869	42,035	41,169	40,339	39,104	38,373			
Seven people	48,176	48,477	47,440	46,717	45,371	43,800	42,076		
Eight people	53,881	54,357	53,378	52,521	51,304	49,760	48,153	47,745	
Nine people or more	64,815	65,129	64,263	63,536	62,342	60,699	59,213	58,845	56,578
Source: U.S. Census Bureau, 2023									

The range of the FPL is from \$14,036 for a single senior 65 years or older to \$65,129 for a household with nine people or more, with one related child under 18 years of age. For a two-person household, the FPL ranges from \$17,689 for householders over 65 to \$20,172 for householders under 65. The average household size in Maine in 2022 is 2.23.⁴ Therefore, we estimate the average FPL for Maine to be approximately \$20,000. 150% of this FPL estimated average is \$30,000.

MAINE HOUSEHOLDS AT OR BELOW 150% OF FPL

The following table shows the estimated number of Maine households by LIAP tier range according to the US Census Bureau.

Households by Income Ranges

LIAP Tier	Percent of FPL	Income Range	US Census Bureau Estimated Households	Cumulative Number of Households
1	0 – 75	0 - \$15,000	52,664	
2	75 – 100	\$15,000-19,999	21,187	73,851
3	100 – 125	\$20,000-24,999	24,819	98,670
4	125 – 150	\$25,000-29,999	23,003 ¹	121,673
¹ Mid-point between \$25,000 and \$34,999				
Source: U.S. Census Bureau, American Community Survey 2022, Table S1901				

⁴ U.S. Census Bureau, 2023

It is estimated that there are 121,673 total households in Maine at or below 150% of the FPL (\$30,000 in household income). Of those, 52,664 are at or below 75% of the FPL and 69,009 are between 76% and 150% of the FPL.

2023 LIAP PARTICIPATION RATE BY INCOME LEVEL

As noted in Chapter I, the number of 2023 LIAP participants at or below 75% of the FPL was 8,923. This is only 16.9% of the 52,664 households at or below 75% of the FPL in Maine. Further, 29,168 LIAP participants were between 76% and 150% of the FPL, which is 42.3% of the 69,009 households in that range. Overall, there were 38,091 2023 LIAP participants, which is 31.3% of the 121,673 households at or below 150% of the FPL.

PROJECTED LIAP PARTICIPATION RATE

While there are approximately 122 thousand households in Maine that are at or below 150% of the FPL, not all of them will participate in LIAP. Some households have their electricity costs bundled into their rent or receive electricity in some other manner and, therefore, are not electric ratepayers. Other eligible households will choose not to participate in LIAP for some reason.

Going forward, it is expected that working with DHHS to identify and automatically enroll (with an opt-out provision) DHHS clients at or below 150% of the FPL will increase the participation rate substantially above the current 31% rate (38,901 participants out of 121,673 potential participants).

Future participation in LIAP is expected to be similar to the participation rate in the Supplemental Nutrition Assistance Program (SNAP). The SNAP program offers assistance for households up to 130% of the FPL or approximately \$26,000 in household income. To estimate the number of households in Maine that would fall within 130% of FPL requires an extrapolation using the table above. Adding 20% of the 125% to 150% number of households, 23,003, to get to 130% FPL adds another 4,601 households for a total of approximately 103,271 (98,670 up to 125% + 4,601 from the next range) households at or below 130% FPL. The United States Department of Agriculture Food and Nutrition Service reported that there were 97,983 Maine households participating in SNAP in July 2023. This is a 95% participation rate of the approximately 103,271 qualified households. This same 95% participation rate is used to estimate the expected eventual LIAP participation.

ELECTRIC BILLS IN MAINE

As shown earlier in this report, the weighted average total residential electricity rate in Maine as of July 31, 2023, is 27.7 cents per kWh and the average annual residential electricity consumption is 6,270 kWhs. Multiplying these together yields an average annual electricity cost for Maine residential ratepayers of \$1,737.

TOTAL LIAP ASSISTANCE NEEDED

The total LIAP assistance needed is the difference between what ratepayers can afford to pay and the total electric bill. For example, a household with \$12,000 in income can afford \$480 per year in electric costs at an affordability rate of 4%. With an average

electric bill of \$1,737, that household would need \$1,257 in annual assistance. The following table shows the total projected LIAP assistance needed in Maine for all potential LIAP participants by multiplying the calculated assistance needed in each income tier by the potential number of participants.

2023 LIAP Assistance Needed Model

Tier	Percent FPL	Income Range	Income Mid-Point	Households	Participation Rate	Participants	Affordability	Average Electric Bills	Individual Assistance Needed	Total Assistance Needed	Percentage Discount Needed
95% Participation Rate											
1	0-75	\$ 0-15,000	\$ 7,500	52,664	95%	50,031	\$ 300	\$ 1,737	\$ 1,437	\$ 71,894,260	83%
2	75-100	\$ 15-20,000	\$ 17,500	21,187	95%	20,128	\$ 700	\$ 1,737	\$ 1,037	\$ 20,872,373	60%
3	100-125	\$ 20-25,000	\$ 22,500	24,819	95%	23,578	\$ 900	\$ 1,737	\$ 837	\$ 19,734,828	48%
4	125-150	\$ 25-30,000	\$ 27,500	23,003	95%	21,853	\$ 1,100	\$ 1,737	\$ 637	\$ 13,920,265	37%
Totals				121,673		115,589				\$ 126,421,726	
Less: 2024 Assistance										\$ (22,500,000)	
Shortfall										\$ 103,921,726	
NOTES:											
Federal Poverty Level Estimated at \$20,000											
Income Range from US Census											
Income Mid-Point is Half Way in the Range											
Households from US Census											
95% Average Participation Rate based on SNAP experience.											
Participants is Households times Participation Rate											
Affordability is 4% of Income Mid-Point											
Electric Bills is the 7/15/23 Calculated Average											
Individual Assistance is the Electric Bills minus Affordability											
Total Assistance Needed is Individual Assistance times Participants											
Percentage Needed Discount is Individual Assistance Needed divided by the Electric Bills											

The calculations show a total LIAP assistance need of \$126.4 million to achieve the four percent affordability target for all eventual participants. The total electric bill discount needed for each of the four tiers is 83% for tier one, 60% for tier two, 48% for tier three, and 37% for tier four.

FUNDING SHORTFALL

The LIAP program year funding for 2024 and 2025 is augmented by a temporary \$7.5 million per year from Maine taxpayers. With the continued PUC approved LIAP funding of \$15 million per year from the ratepayers, the total funding for 2024 is \$22.5 million. This is much improved from the \$7.8 million total funding in the 2022 program year. However, it is \$103.9 million less than the \$126.4 million needed to meet the four percent affordability target for the eventual approximately 116 thousand participants expected.

FACTORS THAT COULD AFFECT THE ASSISTANCE NEEDED ESTIMATE

This analysis is based on the best available current information and recent experience. However, any or all of the assumptions and estimates may have higher or lower values that would increase or decrease the need for low-income electric ratepayer assistance. These factors include:

- The number of Maine households at or below the 150% FPL level may be higher or lower than the 121,673 estimated.
- The percentage of qualified households who choose to participate in LIAP may be higher or lower than the estimated 95%.
- The average incomes in each tier could be higher or lower than the mid-point of the range used.
- The total average annual electric bill could be higher or lower than the estimated \$1,737.

APPENDIX A. SUMMARY OF ASSISTANCE PROGRAMS AND FUNDING BY STATE

State/Program	Funding			
	Federal	State	Ratepayer	Charity
Alabama				
a. LIHEAP	X			
b. Low-Income Rate Assistance			X	
c. Multiple utility-run assistance programs			X	X
Alaska				
a. LIHEAP	X			
b. Power Cost Equalization Program (PCE)		X		
c. General Relief Assistance (GRA)		X		
Arizona				
a. LIHEAP	X			
b. Low-Income Rate Assistance			X	
Arkansas				
a. LIHEAP	X			
b. Low-Income Rate Assistance			X	
d. Multiple utility-run assistance programs			X	X
California				
a. LIHEAP	X			
b. California Alternative Rates for Energy (CARE)			X	
c. Family Electric Rate Assistance Program (FERA)			X	
d. Multiple utility-run assistance programs			X	X
Colorado				
a. LIHEAP	X			
b. Property Tax/Rent/Heat Credit (PTC) Rebate		X		
c. Percentage of Income Payment Plan (PIPP)			X	
d. Multiple utility-run assistance programs			X	X
Connecticut				
a. Low-Income Discount Rate (LIDR)			X	
Delaware				
a. LIHEAP/Delaware Energy Assistance Program (DEAP)	X			
b. Good Neighbor Energy Fund				X

State/Program	Funding			
	Federal	State	Ratepayer	Charity
Florida				
a. LIHEAP	X			
b. Multiple utility-run assistance programs			X	X
Georgia				
a. LIHEAP	X			
b. Multiple utility-run assistance programs			X	X
Hawaii				
a. LIHEAP	X			
b. Low-Income Rate Assistance			X	
Idaho				
a. LIHEAP	X			
b. Project Share (Idaho Power)				X
c. Multiple utility-run assistance programs			X	X
Illinois				
a. LIHEAP	X			
b. PIPP			X	
Indiana				
a. LIHEAP	X			
b. "Poor relief" (State directed but paid by individual townships)				
c. Customer Assistance for Residential Energy (CARE)			X	
d. Multiple utility-run assistance programs			X	X
Iowa				
a. LIHEAP	X			
b. Multiple utility-run assistance programs			X	X
Kansas				
a. LIHEAP	X			
b. Multiple utility-run assistance programs			X	X
Kentucky				
a. LIHEAP	X			
b. Home Energy Assistance			X	
c. Multiple utility-run assistance programs			X	X
Louisiana				
a. LIHEAP	X			
b. Low-Income Rate Assistance			X	
c. Multiple utility-run assistance programs			X	X

State/Program	Funding			
	Federal	State	Ratepayer	Charity
Maine				
a. LIHEAP	X			
b. LIAP			X	
Maryland				
a. LIHEAP/Maryland Energy Assistance Program (MEAP)	X			
b. Electric Universal Service Program (EUSP)		X		
c. Multiple utility-run assistance programs			X	X
Massachusetts				
a. LIHEAP	X			
b. Low-Income Rate Assistance			X	
c. Good Neighbor Energy Fund				X
Michigan				
a. LIHEAP/MEAP	X			
b. Home Heating Credit (funded by LIHEAP)	X			
c. Multiple utility-run assistance programs			X	X
Minnesota				
a. LIHEAP/EAP	X			
b. Low-Income Rate Assistance			X	
c. HeatShare				X
c. Multiple utility-run assistance programs			X	X
Mississippi				
a. LIHEAP	X			
b. Low-Income Rate Assistance			X	
c. Multiple utility-run assistance programs			X	X
Missouri				
a. LIHEAP	X			
b. Various utility-run rate assistance programs			X	
c. Multiple utility-run assistance programs			X	X
Montana				
a. LIHEAP	X			
b. Multiple utility-run assistance programs			X	X
Nebraska				
a. LIHEAP	X			
c. Multiple utility-run assistance programs			X	X

State/Program	Funding			
	Federal	State	Ratepayer	Charity
Nevada				
a. LIHEAP	X			
b. Universal Energy Charge (state mandate)			X	
c. Multiple utility-run assistance programs			X	X
New Hampshire				
a. LIHEAP	X			
b. Emergency assistance program		X		
c. Electrical Assistance Program (EAP)			X	
c. Multiple utility-run assistance programs			X	X
New Jersey				
a. LIHEAP	X			
b. Lifeline Utility Assistance		X		
c. Payment Assistance for Gas & Electric (PAGE)		X		
d. Universal Service Fund (USF)			X	
e. Multiple utility-run assistance programs			X	X
New Mexico				
a. LIHEAP	X			
b. Multiple utility-run assistance programs			X	X
New York				
a. LIHEAP	X			
b. Electric and Gas Bill Relief Program ¹		X		
c. EnergyShare				X
d. Electric and Gas Bill Relief - toward past due balances				
North Carolina				
a. LIHEAP	X			
b. Multiple utility-run assistance programs			X	X
North Dakota				
a. LIHEAP	X			
b. Multiple utility-run assistance programs			X	X
Ohio				
a. HEAP	X			
b. PIPP			X	
c. Multiple utility-run assistance programs			X	X

State/Program	Funding			
	Federal	State	Ratepayer	Charity
Oklahoma				
a. LIHEAP	X			
b. Low-Income Rate Assistance			X	
c. Multiple utility-run assistance programs			X	X
Oregon				
a. LIHEAP	X			
b. Oregon Energy Assistance Program (OEAP)			X	
c. Multiple utility-run assistance programs			X	X
Pennsylvania				
a. LIHEAP	X			
b. Customer Assistance Program (CAP)			X	
c. Multiple utility-run assistance programs			X	X
Rhode Island				
a. LIHEAP	X			
b. Low-Income Rate Assistance			X	
c. The Good Neighbor Energy Fund				X
d. Keep the Heat On				X
South Carolina				
a. LIHEAP	X			
b. Multiple utility-run assistance programs			X	X
South Dakota				
a. Low-Income Energy Assistance Program	X			
b. Multiple utility-run assistance programs			X	X
Tennessee				
a. LIHEAP	X			
b. Multiple utility-run assistance programs			X	X
Texas				
a. LIHEAP	X			
b. Low-Income Rate Assistance			X	
c. Multiple utility-run assistance programs			X	X
Utah				
a. LIHEAP	X			
b. Home Electric Lifeline Program (HELP)			X	

State/Program	Funding			
	Federal	State	Ratepayer	Charity
Vermont				
a. LIHEAP	X			
b. Emergency/General Assistance ²		X		
c. Energy Assistance Program (EAP)			X	
d. Lend a Hand / WARMTH			X	X
Virginia				
a. LIHEAP	X			
b. State sales tax waived for LIHEAP participants		X		
c. Multiple utility-run assistance programs			X	X
Washington				
a. LIHEAP	X			
b. Low-Income Rate Assistance			X	
c. Multiple utility-run assistance programs			X	X
Washington DC				
a. LIHEAP	X			
b. Utility Discount Program (UDP)			X	
c. Electric Universal Service Program (EUSP)			X	
d. Residential Aid Discount (RAD)			X	
West Virginia				
a. LIHEAP	X			
b. 20% reduced rate Nov-Mar			X	
c. West Virginia Utility Assistance Program			X	X
Wisconsin				
m a. Wisconsin Home Energy Assistance Program (WHEAP)	X			
b. Public Benefits Program			X	
c. Multiple utility-run assistance programs			X	X
Wyoming				
a. Low-Income Energy Assistance Program (LIEAP)	X			
b. Energy Share			X	X
Source: Internet research				

APPENDIX B. EXAMPLE ELECTRICITY AFFORDABILITY PERCENTAGES BY STATE

Example Electricity Affordability Percentages for Low-Income Customers by State

State	Electricity Affordability Percentage of Income	Natural Gas Affordability Percentage of Income	Comments
Maine	4%		4% is the electricity affordability percentage used for LIAP. Oil and natural gas heat costs are assisted by LIHEAP.
Rhode Island	3% with no electric heat 6% with electric heat		Proposed legislation.
Connecticut	3% implied	3% implied	The program is 6% affordability total for all building energy costs.
New Jersey	2% with no electric heat 4% with electric heat	2%	The program is 4% affordability total for electricity and natural gas.
Ohio	5% with no electric heat 10% with electric heat	5%	The program is 10% affordability total for electricity and natural gas.
Illinois	3% implied	3% implied	The program is 6% affordability total for electricity and natural gas.
Colorado	3% implied	3% implied	The program is 6% affordability total for electricity and natural gas.

State	Electricity Affordability Percentage of Income	Natural Gas Affordability Percentage of Income	Comments
California	4%	4%	This is a four-year pilot program begun in 2021 covering 15,000 customers in each of four utilities.
Source: Internet research			

APPENDIX C. LOW-INCOME ELECTRIC RATEPAYER ASSISTANCE PROGRAM BEST PRACTICES STUDY RESEARCH AND INTERVIEW SUMMARY

The best practices study compared the Maine Low-Income Assistance Program (LIAP) practices to the practices for low-income electric ratepayer assistance programs in Connecticut, New Hampshire, New Jersey, Ohio, and Vermont. Connecticut, New Hampshire, and Vermont are New England states with similarities to Maine. New Jersey and Ohio have innovative low-income ratepayer assistance programs.

Research of publicly available information on each state's assistance program was conducted followed by interviews of individuals knowledgeable about the programs in each state. Interviews were conducted with:

- The interview for Maine was conducted on August 9, 2023, by SAGE with representatives from Maine Public Utilities Commission (MPUC), Central Maine Power (CMP), and Versant Power (Versant).
- The interview for Connecticut was conducted on October 11, 2023, by SAGE with representatives from the Connecticut Public Utilities Regulatory Authority (PURA), Office of Technical and Regulatory Analysis.
- The interview for New Hampshire was conducted on August 30, 2023, by SAGE with the Director of Consumer Services, New Hampshire (NH) Department of Energy (DOE).
- The interview for New Jersey was conducted on September 8, 2023, by SAGE with representatives from the New Jersey Bureau of Public Utilities (NJBPU).
- The interview for Ohio was conducted on October 12, 2023, by SAGE with representatives from the Public Utilities Commission of Ohio (PUCO), Service Monitoring and Enforcement Department (SMED), Reliability and Services Analysis Division (RSAD).
- The interview for Vermont was conducted on September 6, 2023, by SAGE with the Assistant Program Administrator, VT Department for Children and Families (DCF), Office of Economic Activity. An interview was also conducted on September 25, 2023, by SAGE with the Green Mountain Power (GMP) Vice President, Chief Innovation Officer.

Below are the results of the research and interviews with Maine, Connecticut, New Hampshire, New Jersey, Ohio, and Vermont organized into tables based on the best practices study topics:

- Overview
- Lead Organization Roles
- Assistance Available
- Current Funding and Sources

- Eligibility
- Qualification Process
- Enrollment and Reenrollment Process
- Number of Ratepayers Eligible
- Number of Participants
- Affordability Target
- Benefit Calculation
- Percentage of Need Met
- Outreach Efforts
- Annual Admin Costs
- Manual Processes
- Future Changes

Overview of Program, Governance, History, and Performance Reporting

State	Data
Maine Low-Income Assistance Program (LIAP)	<ul style="list-style-type: none"> ▪ Enacted by the Legislature in 1997 which directed the MPUC to oversee the program. ▪ In 2001, the MPUC created the program. ▪ In 2018/19, created a model for utilities to calculate benefit amounts. However, one utility uses its own model. ▪ In 2022/23, expanded eligibility to include Department of Health and Human Services (DHHS) program participating households at 75% or less of Federal Poverty Guidelines (FPG) and increased funding from \$7.8M to \$15M.
Connecticut Low Income Discount Rate (LIDR)	<ul style="list-style-type: none"> ▪ 10/2/20 – Public Act 20-5 authorized the Public Utilities Regulatory Authority (PURA) to begin proceedings to consider low-income rates to help poor citizens. ▪ 6/1/22 – PURA issued a low-income discount rate straw proposal which directed Electric Distribution Companies (EDC) to submit proposals for implementing a three-tiered LIDR. ▪ 10/19/22 – PURA directed Eversource and United Illuminating to establish a two-tier low-income discount rate no later than 1/1/24 and to start accepting proof of eligibility by 8/1/23. ▪ Pre-enrollment with CAAs started 8/1 and will continue until 1/1/24. ▪ A second LIDR objective is to reduce uncollectable expenses and the need for service disconnects/reconnects.
New Hampshire Energy Assistance	<ul style="list-style-type: none"> ▪ As directed by legislative bill, the Public Utility Commission (PUC) adopted the EAP as part of electric restructuring in 2002. The PUC and now the Department of Energy (DOE) submit annual

State	Data
Program (EAP)	<p>reports to the applicable house and senate legislative committees.</p> <ul style="list-style-type: none"> ▪ The EAP was created by Commission order. DOE Customer Services has control over the EAP fund; utilities transfer received funds in and get paid from the fund.
New Jersey Universal Service Fund (USF)	<ul style="list-style-type: none"> ▪ The Electric Discount and Energy Competition Act mandated the New Jersey Bureau of Public Utilities (NJBPU) to establish a non-lapsing USF for low-income assistance with electric and natural gas utility costs was signed into law 2/9/1999. ▪ The NJBPU ordered an interim USF 11/21/2001 for Elizabethtown Gas, NJNG, PSE&G, SJG, Connectiv, and RECO but not JCP&L with its previously ordered Customer Assistance Program (but JCP&L was added when the order became permanent). ▪ On 3/21/2002 NJBPU approved an interim USF of \$15M; based on this budget, customers that met LIHEAP requirements received a one-time \$200 fixed credit with the balance used to give a \$100 credit to renters. ▪ On 4/30/2003 the Board ordered a USF be established: <ul style="list-style-type: none"> ○ At \$30M for the first year and expenses capped at 10% ○ Eligibility to be based on 175% of FPG with Lifeline and LIHEAP participants automatically screened. ○ With a PIPP designed to give low income a credit based on assessments of income and consumption that reflect their ability to make monthly payments. ○ USF participants earn a credit such that they pay no more than 6% of annual income for gas and electric (3% max for each) or 6% if electric only. ○ Total USF credit capped at \$1800 per household. ▪ USF rates were effective 8/1/2003. ▪ Compliance filing date changed to July 1. ▪ In June 2010, NJBPU approved seven stipulations to resolve past USF administrative cost issues; raised eligibility to 400% FPG; increased monthly benefit cap from \$150 to \$180/month; increased the affordability threshold from 3% to 2% for gas and electric and from 6% to 4% for electric only; created a \$5 USF monthly benefit for those who meet income but not energy affordability requirements (this was temporary – expired 9/30/23). ▪ Rates were changed in Sept 2021. ▪ Rates changed again in Sep 2022, but they were interim rates. ▪ On 6/29/2023 BPU ordered the current rules which started

State	Data
	<p>10/2/2023:</p> <ul style="list-style-type: none"> ○ Align USF income ceiling with LIHEAP income ceiling (currently 60% of State Median Income). ○ Maintain the USF affordability at 2% of annual income for gas and non-heating electric and 4% for electric heating. The USF covers any electric and gas costs over these thresholds up to the benefit cap. ○ Originally 3% and 6% were based on a Coltan and Sheehan study when started but during the pandemic a working group recommended 2% be chosen and post pandemic, BPU decided to keep it there – public opinion supported. ○ The average amount of benefit is \$50 for gas and electric each, \$100 total. Also, most ratepayers are covered under LIHEAP. An estimated 70% of New Jersey ratepayers use natural gas. ○ Maintain the monthly benefit cap at \$180/month for gas and electric combined. [This controls total program costs but does not meet the 2%/4% target for seven percent of the participants who likely have low income and high energy costs.] ○ Maintain the minimum \$5 monthly benefit for individuals who meet the income threshold but not the energy bill threshold. ○ The minimum benefit was created primarily to get them into Fresh Start, the arrearage forgiveness program. Also, a customer in USF is protected from termination during the heating season. Another purpose was to get people in rentals who might not be qualified. Fresh Start is a component of USF. When started, it was only for first time participants but now, if a person is participating in USF with an arrearage over \$60 and has not participated in Fresh Start for the last five years, they will be auto enrolled.
Ohio Percentage of Income Payment Plan (PIPP) Plus	<ul style="list-style-type: none"> ▪ PIPP Plus is also referred to as PIPP. ▪ Ohio Administrative Code 122:5-3-02 effective 11/25/21. ▪ A Universal Service Fund (USF) was established to fund this and other low-income assistance programs. ▪ Also established a Public Benefits Advisory Board ▪ In 2019, the statute changed and allowed the Department of Development (DoD) to manage the electric PIPP plan. PUCO also manages the rates.

State	Data
	<ul style="list-style-type: none"> ▪ The program started in 1983. There have been several modifications to the program with a major modification in 2010. <ul style="list-style-type: none"> ○ In 2010 the payment was changed from 6% of income to 5%. ○ In 2022, eligibility was changed from 150% FPG to 175% FPG. ▪ Responsibility for PIPP is assigned to DoD because they are also responsible for LIHEAP and Summer Crisis funding to assist with electricity due to increased cooling needs. They also provide fans. Important support for seniors (60+). Summer Crisis can provide help with electrical payments. Funding comes from HEAP if there is money left over after winter. They can pay up to \$500.
Vermont Energy Assistance Program (EAP)	<ul style="list-style-type: none"> ▪ On 7/22/2011, VT Public Service Board [which changed its name to Public Utilities Commission on 7/1/2017] approved the order that established the EAP for Green Mountain Power (GMP) and Central Vermont Public Service (CVPS). [CVPS was bought by Quebec's Gaz Metro 6/27/2012 and merged into its GMP subsidiary.] ▪ "GMP has operated the EAP since 2012. Over time, the program has adjusted its design and evolved its practices and approaches to delivering the program." ▪ A recent PUC rulemaking on 3/3/23 changed several aspects of the program including expanded eligibility from 150% to 185% of FPG, increased EAP charges for ratepayers, auto renewal, and use of federal and state funds for arrearage forgiveness. ▪ EAP arrearage forgiveness has been started and stopped several times – each time it was reinstated, enrollment jumped up. In late 2016, arrearage forgiveness was made permanent. Arrearage is forgiven only the first time a customer enters program – one time only for life. ▪ Originally the discount only applied to the first 600kWh used; this restriction was removed in late 2016. ▪ GMP does have an arrearage program. A first-time applicant who is eligible can have their arrearage forgiven. This is automatic with acceptance to EAP – GMP looks at the account and decides to apply. ▪ The program is only residential. The only people not served are those if the account is not in their name. GMP covers 70% of the state but there are 16 other electric suppliers. There is no Vermont PUC approved program for the other 30% However, the other utilities may implement programs at their own initiative. For example, Burlington Electric has a low-income assistance

State	Data
	program which provides a 12.5% discount (bill credit) for eligible customers. Those who are enrolled in the VT Fuel Assistance Program, or the federal Housing Choice Voucher (Section 8) Program can apply.

Lead Organization Roles

State	Data
Maine LIAP	<ul style="list-style-type: none"> MPUC oversees the program created by a PUC rule. MaineHousing (MH) administers the fund created by the program. The individual utilities are responsible for developing their own programs to conform to the requirements of the rule.
Connecticut LIDR	<ul style="list-style-type: none"> Currently, PURA manages and oversees the program. Connecticut's Office of Consumer Counsel and Department of Energy also participate. Administration/assistance from the Department of Social Services (DSS) and Community Action Agencies (CAA) is still being worked out.
New Hampshire EAP	<ul style="list-style-type: none"> DOE manages/oversees. There is still some "overlap" with the PUC that is being worked out. The DOE was formed two years ago, primarily from PUC personnel. The PUC is now smaller. CAAs are the program administrators – client outreach and intake, application processing, enrollment, periodic review of ongoing program eligibility, and compliance monitoring for adherence to program guidelines. CAAs deal directly with the utilities; there are two-way communications, and the utility provides billing info through Electronic Data Interchange (EDI) transactions. CAAs maintain this info for monitoring usage and to help determine future program design changes/modifications. This data can also be used to target specific households with high usage for help. CAAs are overworked and underfunded in Vermont also but it is part of their budget to provide that help. There are five CAAs in NH with one designated as the lead agency. The lead agency coordinates to help with high usage households identified in other agency areas. The 1.5 mill per kWh was set by the NH legislature. The PUC can reduce this, but the cap is set. Also, an EAP Advisory Board with representatives from the four utilities, DOE, Office of Consumer Advocate, CAAs, NH Local

State	Data
	Welfare Administrators Association, and NH Legal Assistance – meets quarterly on the last Fri of Jan, Apr, Jul, and Oct. It monitors the EAP, drafts recommendations for programmatic changes, and provides clarification and guidance to the parties responsible for administering the program.
New Jersey USF	<ul style="list-style-type: none"> ▪ NJBPU provides oversight and control (determine funding, the appropriate admin, and purposes of the programs funded with the USF). ▪ The Department of Community Affairs (DCA) administers the program for the PUC. They qualify the participants.
Ohio PIPP Plus	<ul style="list-style-type: none"> ▪ The Department of Development (DoD) manages and administers the electric PIPP program. ▪ PUCO manages the gas PIPP. ▪ DoD central offices are in Columbus, and they utilize the CAAs in each county. There are coordinators for each agency and a coordinator for each district for the state of Ohio. ▪ There is at least one CAA in each county (88 counties). There are about 91 CAAs in total.
Vermont EAP	<ul style="list-style-type: none"> ▪ Vermont PUC provides rulemaking and oversight. ▪ Department of Human Services (DHS), Department for Children and Families (DCF) -administers eligibility. ▪ GMP operates the program – they have a contract with PUC and DCF. DCF takes the application and reviews and determines eligibility and informs GMP about them – also the applications for renewal. GMP pays them a contracted amount for this work – it does cover their expenses. The annual amount is \$175,000 which includes salary and benefits for staff that determine eligibility and other costs such as postage and envelopes for mailing determination letters and renewal applications. State employees at DCF do the work, not CAAs. DCF employees do all the assistance programs including SNAP, LIHEAP, etc. CAAs do crisis assistance and weatherization under contract with DCF. ▪ Newly qualified and requalified customers are reported to GMP by DCF daily via an emailed spreadsheet. GMP then applies the monthly discount to the qualified ratepayers.

Assistance Available

This includes such data as total amount of assistance, range to each participant, average to each participant, and frequency of support.

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State	Data
Maine LIAP	<ul style="list-style-type: none"> ▪ \$15M starting 2022–23. ▪ MPUC sets the funding level (\$15M) based on the statute requirement to cover the need that exists and to address economic exigencies. If the state-wide cost of electricity increases, they increase the funding level. ▪ There are four benefit levels based on the percent of FPG for all utilities except CMP. ▪ The average participant amount in 2021–22 was \$325. Amount will stay same but increased numbers in 2022–23.
Connecticut LIDR	<ul style="list-style-type: none"> ▪ Tier 1: 10% discount on monthly electric bill. ▪ Tier 2: 50% discount on monthly electric bill. ▪ Monthly usage caps were established based on EDC rates. ▪ The Final Decision (10/11/23) requires the discount to be applied to the customer service charge (CSC) and the electric commodity. The utilities planned to only apply it to kWh usage, but they were told to also apply it to the CSC but not to things like loans. The CSC is around \$12 but varies depending on utility. ▪ Usage caps are applied but they vary depending on the utility and on whether electricity or fuel/gas is used for heating. They use proxies for United Illuminating (UI) which involves using historical rates for electric heating customers. Eversource has more detailed data. The usage cap is 800 kWh for non-electric and 1200 kWh for electric usage. They looked at the average usage for each type of customer from each utility. ▪ To be eligible for arrearage, a customer has to be designated a financial hardship customer. The PURA reps were not sure a customer would be auto enrolled if they were already in one of the programs.
New Hampshire EAP	<ul style="list-style-type: none"> ▪ Through the System Benefits Charge (SBC), ~\$15–16M is collected annually for EAP. For 2022, ~\$14.7M received and ~\$12.8M in bill assistance provided. ▪ During energy deregulation, the SBC was created. The PUC used this language to create the two programs. In 1998–2000 there was concern with bill assistance for low income and the legislature created the cap of 1.5 mill per kWh. ▪ Monthly electric bill discount on the first 750 kWh ranging from 8–76% based on income and household size. (Usage above 750 kWh is billed at a non-discounted rate, serving as an incentive for energy efficiency and conservation.) ▪ About 80% of EAP participant households use 750 kWh or less. The other 20% may be flagged for energy efficiency assistance

State	Data
	<p>due to high usage.</p> <ul style="list-style-type: none"> As of 9/19/22, the percentage of enrolled households for each discount tier were: 17% at 76% tier, 18% at 52% tier, 17% at 36% tier, 15% at 22% tier, and 33% at 8% tier.
New Jersey USF	<ul style="list-style-type: none"> The USF benefit is designed to help pay no more than 2% on a natural gas bill alone and no more than 2% on an electric bill alone (or, if heated with electricity, no more than 4% of income on electricity). The USF credit is capped at \$180/month for both electric and gas combined. Only 7% of participants receive the maximum benefit, meaning 93% receive a benefit that meets the 2%/4% target. Annual revenue: \$268M was the estimated budget covered by the SBC in 2022.
Ohio PIPP Plus	<ul style="list-style-type: none"> Monthly payment by customer is: <ul style="list-style-type: none"> Electricity: \$10 or 5% of your gross monthly household income each month, whichever is greater. (Gas is the same) All-electric homes: \$10 or 10% of your gross monthly household income each month, whichever is greater. There is no program max payment; the 5% or 10% is the max they will pay each month. Most ratepayers who join have arrearage amounts. Once their arrearage is paid off (see below), their bill can be less than the 5% or 10% they are paying, so they leave the program. The balance of the monthly bill plus 1/24 of any arrearage is paid by USF. The customer is responsible for their PIPP payment amount. The remainder is put into their account balance. As long as they pay on time and in full, they receive two credits: (1) Delta credit – the difference between the actual bill and their PIPP payment will be credited by the utility to their account balance; (2) 1/24 credit of their arrearage. The majority of those who join PIPP have arrearages. PIPP seems to be primarily for those behind on payments.
Vermont EAP	<ul style="list-style-type: none"> All enrolled households receive a 25% discount on their monthly electric bill for the kWh used only. Originally this was restricted to the first 600 kWh, but this restriction was removed in late 2016.

Current Funding and Sources

State	Data
Maine	<ul style="list-style-type: none"> Funding is from utility ratepayers; the amount is set by PUC and

State	Data
LIAP	<p>recovered by the utilities through their individual rate cases.</p> <ul style="list-style-type: none"> ▪ The additional \$7.5M in funds for 2023–24 and 2024–25 comes from taxpayers.
Connecticut LIDR	<ul style="list-style-type: none"> ▪ Estimated costs will be \$32M for Eversource and \$39M for UI. However, this does not include implementation and administrative costs. ▪ The PURA rep was not sure about these estimates. The negotiated monthly payment amount will change this amount so the utilities would incur additional expenses for this. ▪ Service Benefit Charge (SBC). PURA directed Electric Distribution Companies (EDC) to submit their incurred costs for LIDR for one year in the next year’s annual review of the Revenue Adjustment Mechanisms (RAM). All costs shall be reconciled through the SBC. ▪ Each utility allocates the SBC differently. For UI, the percentage of kWh usage for each rate class. Residential households pay about 43% of SBC and commercial/industrial pay more. Eversource takes the net cumulative SBC costs incurred by each customer class and allocates the revenue required to recover these costs to the same customer class, so it is skewed more toward residential which pays approximately 90% of the SBC. This is under review as part of the rate adjustment review process. In its 10/11/23 decision, PURA decided to delay making a decision about modifying the Eversource plan until it has more information. ▪ The SBC covers other things besides LIDR including energy affordability programs like arrearage. ▪ The SBC is a line item on the bill. ▪ “Pretty sure” the SBC is a dollar amount per kWh. ▪ The annual rate adjustment mechanism (RAM) is the process for making utilities to be made whole for all the discounts given during the year. This covers all of the SBC components. Also, this year they are anticipating higher costs once the program starts, so the SBC was increased to cover this. Some costs have already been incurred (IT costs plus admin costs and similar) and were included in this year’s RAM. ▪ Companies have modified the Memoranda of Understanding (MOU) with the CAAs to include enrollment for the discount rate. There is a small financial incentive (\$5 for each participant enrolled) in the MOU for the CAA to promote the Tier 2 discounts. They also receive funding through DSS. ▪ Operation Fuel, Inc. (OF) has an MOU with the utilities that

State	Data
	provides an incentive (\$5 for each participant enrolled) to enroll customers in Tier 2. It is a nonprofit state fuel bank to provide heating assistance. It receives some funding through electric rates. Ratepayers can donate to it but there is also funding through energy bills and they do their own fund raising. Also, if utilities commit violations, the fines can be directed to OF.
New Hampshire EAP	<ul style="list-style-type: none"> Regulated utilities (Eversource, Unitil. Liberty, and New Hampshire Electric Co-op) bill ratepayers through the System Benefits Charge (SBC) on their electric bills. The state treasurer manages the fund, but disbursement is only by authorization of DOE.
New Jersey USF	<ul style="list-style-type: none"> The USF Trust Account is funded through gas and electricity USF rates which are part of the Societal Benefits Charge (SBC). The SBC also includes the clean energy and lifeline programs. The SBC is included with all electric and gas bills for all customer classes. It is determined by usage – per kw charge. The average billing impact depends on average usage. Billing is 0.0111 for gas and .003417 for electric. The average annual total bill was \$52.97. It averaged \$26.65/mo. for electric for a year for 650 kw of use. All funds are collected and sent to the USF Trust Fund monthly. All funds are collected each month, and the utilities are reimbursed the next month. Sometimes there is not enough in the fund to cover all the expense. The BPU does a true-up with the utilities at the end of each year. The difference is then funded not through base rates or the USF but through its own special temporary rate addition to adjust for the shortfall. The NJBPU audit division does the annual true ups with each utility.
Ohio PIPP Plus	<ul style="list-style-type: none"> Funded from the USF which is funded by the Universal Service Rider on all electric bills. For gas there is a gas PIPP rider. Riders are updated annually. Utilities update the amount through rate cases. For the USF, they do a projection and then it is tried up at the end of the year. Large industrials get a break on the electric side. Electric Case number for 2022: 22-0556-EL-USF. Gas side case number for Dominion: 22-0419-GA-TIP. CAAs are paid an admin fee. They are allocated a budget based on how many people in the county are estimated to use their services. Funding for PIPP work comes from the USF.
Vermont EAP	<ul style="list-style-type: none"> EAP is funded by a monthly fee charged to all ratepayers. <ul style="list-style-type: none"> Residential: \$1.50 Commercial: \$3.00

State	Data
	<ul style="list-style-type: none"> ○ Industrial: \$75.00 (six customers) ▪ DHS oversees the eligibility process. ▪ This represents a fixed amount of funding. ▪ The fees were raised back up to \$1.50, \$3.00, and \$75.00 to resolve the negative balance in the fund (\$3M behind when started this year). After the change, GMP estimates it will take five years to return to zero. GMP is also practicing increased diligence in monitoring eligibility to remove those no longer eligible. ▪ At one time, GMP considered dropping the discount to 20% but instead decided to implement the fee change. Will continue to evaluate every 3–5 years. ▪ EAP is its own tariff, but it's calculated as a 25% discount off the standard tariff.

Eligibility

State	Data
Maine LIAP	<ul style="list-style-type: none"> ▪ LIHEAP eligible households are eligible and households participating in a DHHS program with income 75% of FPG or less. (However, it was noted this did not bring as many people as expected/desired. Will probably increase to 100% at next adjustment.)
Connecticut LIDR	<ul style="list-style-type: none"> ▪ Two Tiers: <ul style="list-style-type: none"> ○ Tier 1 (lower-level discount) up to 60% State Median Income. ○ Tier 2 (higher level discount) up to 160% FPL. ▪ There are additional eligibility levels depending on what other programs a household might be involved in. ▪ Confidentiality – engendered a lot of conversation in Connecticut. They currently do not have an auto enrollment program. A person is auto-enrolled only if they are already identified as a financial hardship or if receiving HEAP. ▪ PURA is working with DSS – they have an application for assistance which can be used for all benefits and in the terms of that application they have conditions which identify who this data can be shared with. Starting in Jan 2024, the application includes a note that they will provide the information to the utilities with an opt out option. They have not started data sharing yet in order to allow people to learn about it. They will start next year sometime. ▪ There is no opt-out data available. Since implementation in 2022, 27K have opted in.
New Hampshire	<ul style="list-style-type: none"> ▪ 60% of NH State Median Income (SMI).

State	Data
EAP	
New Jersey USF	<ul style="list-style-type: none"> USF: Households with income at 60% of State Median Income or less are eligible; however, the benefit is also based on how much is paid for energy each year.
Ohio PIPP Plus	<ul style="list-style-type: none"> Gross household income at or below 175% FPG DoD personnel process applications and verify income. Utilities use DoD and the CAAs for determining eligibility and processing.
Vermont EAP	<ul style="list-style-type: none"> 185% of FPL.

Qualification Process

State	Data
Maine LIAP	<ul style="list-style-type: none"> Qualification is determined during an interview at a CAA.
Connecticut LIDR	<ul style="list-style-type: none"> EDCs were directed to provide PURA by 2/1/23 their proposed methods for verifying customer eligibility for Tiers 1 and 2. Customers can go to three different places to prove eligibility/apply – the utilities, CAAs, or OF. They provide their household income plus other data. A customer only has to provide household income. If they are receiving a public assistance benefit, they just need to show proof of that. All three entities can then enroll the customer. There is a social agency portal that CAAs and OF can utilize that allows them to enroll the customer in the correct Tier. There is one portal for each utility which is managed by that utility. A customer could also apply over the phone with a utility customer service representative or email/fax the application to the utility themselves. The income qualification requirement reads: “To qualify, your household annual income for all adults over 18 must be at or below 60% of the state median income, or you can show receipt of a public assistance benefit for at least one household member.”
New Hampshire EAP	<ul style="list-style-type: none"> Phone call to make appointment at local CAA. The CAA will inform them as to what documents to bring. There are five NH CAAs. One is the lead CAA. At the capbm.org website, the mail-in application form can be downloaded along with 8 other forms.
New Jersey USF	<ul style="list-style-type: none"> The Department of Community Affairs handles qualifications. A person can create a login at the DCAid Service Portal (myNewJersey ID) and answer qualification questions and provide the necessary documents or they can mail in the application and documents.

State	Data
	<ul style="list-style-type: none"> ▪ CAAs make appointments with people and have an outreach where they can visit homebound folks. They are contracted with DCA. There are approx. 40 CAAs in NJ. ▪ (Note, the Dept of Community Affairs webpage [https://www.nj.gov/dca/divisions/dhcr/offices/caalist.html] lists 32 CAAs.) ▪ Once these steps are done, they then complete a program application. This is for both USF and Home Energy Assistance (HEA) (LIHEAP). ▪ Required documents can be uploaded here also.
Ohio PIPP Plus	<ul style="list-style-type: none"> ▪ The first time someone applies for PIPP, they must make an appointment with a CAA. ▪ Download an application from DoD website and submit: <ul style="list-style-type: none"> ○ Online at DoD website. ○ By calling or in-person at a local CAA. ○ Mail application and required docs. ▪ Must provide: <ul style="list-style-type: none"> ○ Primary household member name, address, etc. ○ Proof of income for each household member over 18 ○ Most recent utility bills. ○ List of all household members with SSN and date of birth. ○ Proof of US citizenship, legal residency, etc. ○ If renting, landlord info.
Vermont EAP	<ul style="list-style-type: none"> ▪ Download a printable application form from DCF webpage or call and have one mailed, complete and mail to the Economic Services Division. Note that there is a document uploader link but only for any additional docs requested. ▪ There is one application for all programs except Medicaid and EAP. EAP is a separate application because when the program started, initially DCF did not believe they had the bandwidth to support it; later they agreed if it was done outside of their IT programs. So, it's all still done manually – Excel spreadsheets. May be quite some time before it is merged into their regular Access program. With only two people, it is manageable. ▪ The application for multiple programs is large (30 pages) but there is an option to apply only for Fuel Assistance and also a separate small two-page application for just Fuel Assistance also. Lots of people use that so some may find it easier to have the separate application. EAP is separate from Fuel Assistance. ▪ DCF sends a list to GMP every week of new enrollees and requalified enrollees. GMP's process is computerized and basically

State	Data
	“flips a switch” to enable the program for the customers.

Enrollment and Reenrollment Process

State	Data
Maine LIAP	<ul style="list-style-type: none"> ▪ Included as part of the LIHEAP application process. Requires annual re-enrollment. If qualified for LIHEAP, the CAA asks if they wish to enroll in LIAP. They can also call the utility direct and, if they provide documentation showing LIHEAP qualification, they will be enrolled. ▪ If enrolled in a DHHS program and are at or below 150% FPG in 2024, DHHS will send a letter that the customer signs, adds their account number, and presents to the utility for enrollment.
Connecticut LIDR	<ul style="list-style-type: none"> ▪ All customers coded as financial hardship by the EDCs and all electric customers receiving CEAP awards shall be automatically enrolled in Tier 1. ▪ There is no automatic enrollment for the state programs except for CEAP. They haven’t started data sharing yet, maybe next year. There is an “opt out” option on the application, but it has not been activated yet. (See pages 23 and 24 of the 10/11/23 Final Decision)
New Hampshire EAP	<ul style="list-style-type: none"> ▪ A person can apply anytime. However, they must recertify each year. ▪ If they are 60 years old and above, they can recertify every two years. ▪ Many apply for the fuel assistance program (FAP) (funded by LIHEAP) at the same time. Many requirements are the same. DCF tries to mirror the procedures as much as possible. The CAAs let customers know when to recertify. Recertification has the same process as the initial certification as households and incomes change over time.
New Jersey USF	<ul style="list-style-type: none"> ▪ Apply for LIHEAP and USF at same time – it is a single application, except during the period when LIHEAP is not accepting apps, then a person can apply for USF only. A person can apply year-round but around September the portal shuts down the LIHEAP portion to prepare for a new season on Oct. 1. ▪ Download an application or request from the “LIHEAP/USF application agency” DCA has a webpage with the list and link for the portal to do everything online. ▪ A person must recertify each year. They must complete a new application if they have moved. Also, there are auto enrollees – people on food stamps (SNAP) and the lifeline program for

State	Data
	<p>seniors and disabled. These come from DHS. They can also provide household income though they define “household” differently (food for DHS vs heat for NJ) but the state accepts it. Once a person/household is determined eligible for one of these programs, they are auto enrolled in USF.</p> <ul style="list-style-type: none"> Probably a participant is informed of this possible use of their data on the application and signs a release.
Ohio PIPP Plus	<ul style="list-style-type: none"> Provide proof of income every 12 months. If there’s a change in the household, they must notify the CAA/utility within 30 days. This usually coincides with applying for HEAP. Pay the full PIPP Plus amounts in full every month. Can enroll anytime and once enrolled, that is the start of the 12-month period. DoD has a database that interfaces with agencies, DoD, and the utilities.
Vermont EAP	<ul style="list-style-type: none"> Per the ruling in Mar 2023, they are supposed to end annual re-enrollment but this was predicated on the “programmatic” resources of DCF. They are still working on this. There is a small group of people in EAP that only have to renew every three years (they have a stable life) – they are talking about that coming over to EAP but currently, all in EAP do still have to renew annually. Requalification is done by DCF. GMP sends a list of all EAP participants at 12 months to DCF. DCF mails a package to these for requalification and, when responses are received, they notify GMP of who has requalified. GMP gives the customer four months to complete the requalification process. GMP sends a letter to them also at the two month point to remind them they need to do the paperwork. Even if they get dropped, they can reapply and get re-entered. There is no limit to how many times a customer can be on the program.

Number of Ratepayers Eligible

State	Data
Maine LIAP	<ul style="list-style-type: none"> In 2021–22, approximately 132,898 households

State	Data
Connecticut LIDR	<ul style="list-style-type: none"> No estimate of the number of people eligible. An attempt was made using marketing data through Experion but found it was not accurate. They only have the number who are designated financial hardship – these people will be auto enrolled. As of August 2023, there are 28,137 UI financial hardship customers and 74,926 Eversource financial hardship customers.
New Hampshire EAP	<ul style="list-style-type: none"> Approximately 120,000.
New Jersey USF	<ul style="list-style-type: none"> Have heard from LIHEAP that the number who are eligible and enrolled is low. But people with low income can still pay their utility bill.
Ohio PIPP Plus	<ul style="list-style-type: none"> No data.
Vermont EAP	<ul style="list-style-type: none"> At 185% of FPG ~ 59,594 for the state and ~ 56,090 served by GMP based on 2017 EIA data. At 150% of FPG ~ 35,869 served by GMP.

Number of Participants

State	Data
Maine LIAP	<ul style="list-style-type: none"> In 2021–22 approximately 27,000 In the past, 40K in Maine enrolled in LIHEAP and generally, 24-26K of those participate in LIAP, so maybe 60% of those eligible.
Connecticut LIDR	<ul style="list-style-type: none"> Unknown
New Hampshire EAP	<ul style="list-style-type: none"> ~27,500 households. Currently, ~32,300 today. Perhaps the increase was due to higher electricity costs. The number increased by a factor of five this past winter. Would make participation rate about 27% (32.3 K / 120 K).
New Jersey USF	<ul style="list-style-type: none"> At the end of August 2023, LIHEAP 227k, and in USF 220K.
Ohio PIPP Plus	<ul style="list-style-type: none"> As of end of Dec 2022 340,649 on gas and/or electric. (total residential in Ohio is 7.4 million).
Vermont EAP	<ul style="list-style-type: none"> At 150% of FPG ~ 10,560 as of 5/31/2019 or 30% of those eligible. Vermont did a study a few years back and estimated that 30K customers were at the 185% level. Of that, GMP has 22-23K eligible and 10-11K in the program. So, a little less than half of the potential customers are on EAP. Many refused to sign up out of

State	Data
	principle. And many are still not aware of the program.

Affordability Target (Percent of Income)

State	Data
Maine LIAP	<ul style="list-style-type: none"> Initially, CMP (which services 86% of the state's residential population) had a program that used 5% of income as the affordable amount. All the other utilities use the commission's model which is based on 4%. For the model, the PUC used the mid-points of four FPG levels (0–75%, 75–100%, 100–125%, and over 125% of FPG) and the average usage of low-income customers in the area or general usage if that was not available.
Connecticut LIDR	<ul style="list-style-type: none"> PURA aims to limit household energy costs to 6% of annual household income. 2–3% electric non-heating but 6% if electric heating. Both tiers are expected to achieve the 6% affordability level while acknowledging that this is an average, so there will be some exceptions. The 6% figure was estimated to be the appropriate amount for the average customer; also based on experts' opinions.
New Hampshire EAP	<ul style="list-style-type: none"> The goal of the EAP is to provide bill discounts that reduce, on average, participant electric bills to between 4% and 5% of the average income for each discount tier. NH EAP Advisory Board defines an affordable percentage of income as 6%. However, the DOE representative says that the target is to get between 4–5%.] There is a fixed collection amount but a variable payout. They monitor enrollment and do projections. Based on these, they may need to implement a waiting list, which they've done in the past in 2010 or 2012. The \$7M was appropriated to cover the shortage last year. What to do when funding gets low and who makes the decision is an issue still being worked out. In the past, the Commission implemented a wait list for new participants until adequate funding was available. Nearly half the total home energy burden for low-income households in NH can be attributed to electricity bills.
New Jersey USF	<ul style="list-style-type: none"> 2% electric; 2% gas; 4% if electric only.
Ohio	<ul style="list-style-type: none"> The analysis performed in the move from 6% to 5% in 2021: In

State	Data
PIPP Plus	<p>2010, PUCO, working with DoD, looked at the energy burden for customers and how much they could pay, how many could make the monthly payments, how many could keep service on, and similar. Worked with DoD to make sure percentages were the same for gas and electric.</p> <ul style="list-style-type: none"> Percentage of ratepayers participating in PIPP: On the gas side it fluctuates due to the changing commodity rates. When commodity rates are low, people don't join PIPP or only for a short time to get their arrearage credited. Once they have no more debt, they remove themselves because their bill is less than their percentage payment. For electric PIPP, the five-year participation trend is down. During Covid there was a lot of additional funding available so many got their balances resolved. With that funding gone, the trend might be up again this year.
Vermont EAP	<ul style="list-style-type: none"> None, just aligning with the 185% FPG, the same percentage as used by other Vermont programs.

Benefit Calculation

State	Data
Maine LIAP	<ul style="list-style-type: none"> Depends on how much electricity the customer uses. If they use more than average, they don't get the 4%, if they use less, they will get more than the 4%.
Connecticut LIDR	<ul style="list-style-type: none"> Both tiers are expected to achieve the 6% affordability level while acknowledging that this is an average, so there will be some exceptions.
New Hampshire EAP	<ul style="list-style-type: none"> Five discount tiers based on household size and income. 76%, 52%, 36%, 22%, and 8%. When the program started, there were 8 tiers, but these five are set now.
New Jersey USF	<ul style="list-style-type: none"> The database system auto collects the information. CAAs enter income and household size, a record is sent to the utility weekly, they request the energy cost for the past year and the system auto calculates the dollar amount of the credit. It calculates the amount over the 2% up to the \$180 amount. This is based on average historical annual usage. The system also deducts the LIHEAP and Lifeline amounts before calculating the USF amount. The NJ Office of Information Technology manages the database, and all the data is fed into it. One system. The portal (DCAid Service Portal) is new but connects to the database.

State	Data
Ohio PIPP Plus	<ul style="list-style-type: none"> Customers pay up to 5% or 10% (if electric heated) of their income, and anything over that is credited to the utility. As long as a customer's bill is less than 5% (or 10%) of their income, no assistance is received.
Vermont EAP	<ul style="list-style-type: none"> Flat rate – 25%. Just on the electricity – kWh. Other charges – pay the full amount including the EAP fee. The 25% discount is for the full bill – all kWh.

Percentage of Need Met/Assistance Gap

State	Data
Maine LIAP	<ul style="list-style-type: none"> Potential needed assistance ranges from \$28.8M to \$89.6M per year. Current assistance is \$17M with possible expired solar credits adding \$2M. This leaves assistance gap of \$9.8M to \$70.6M with midpoint of \$40.2M.
Connecticut LIDR	<ul style="list-style-type: none"> The math says the total need will be met, on average, for both tiers up to the maximum consumption.
New Hampshire EAP	<ul style="list-style-type: none"> Generally speaking, the 4–5% goal is achieved. A consultant was hired to review the program and made specific recommendations for each tier. Not successful with the latest highest rates, especially the 76% tier. There is no mechanism to keep everyone at 4–5%. Discount amounts are set. Yearly review has led to upcoming changes to the 76% and 8% tiers by the Commission.
New Jersey USF	<ul style="list-style-type: none"> All except for 7% over the maximum benefit and possibly greater than 60% of median income with high energy bills.
Ohio PIPP Plus	<ul style="list-style-type: none"> Based on the monthly PIPP Plus payments, 5% for gas and electric but 10% for all electric homes.
Vermont EAP	<ul style="list-style-type: none"> Vermont did a study (contract with GDS) a few years back and estimated that ~30K customers were at the 185% level. Of that, GMP has ~22–23K who are eligible and ~10–11K in the program. So, a little less than half of the potential customers are on EAP. Many refused to sign up out of principle. And many are still not aware of the program.

Outreach Efforts

State	Data
Maine LIAP	<ul style="list-style-type: none"> PUC has info on their website, provide info to 211, and participate in functions with different groups where info is provided; they rely primarily on CAA interaction. They have also done TV and media

State	Data
	<p>messages.</p> <ul style="list-style-type: none"> ▪ All DHHS customers that are at or below 75% FPG receive a letter that they are eligible with instructions on how to contact their utility and to retain the letter as proof. ▪ Versant uses their website and any time a customer calls, they are asked if they would like information on assistance programs – all callers, and direct mailing to those who applied the previous year. Info is not just for LIAP but all available programs. They also ran a Twitter campaign with information on LIHEAP and low-income assistance. ▪ CMP: individual handouts at community events, info stuffers with bills, assistance/info page on website, direct mailings to those who applied the previous year, newspaper and radio interviews, and if someone calls with billing problems it is offered.
Connecticut LIDR	<ul style="list-style-type: none"> ▪ Utilities will auto enroll all financial hardship cases in Tier 1. They will send an email to notify them of this, provide the Tier guidelines, and encourage them to see if they are Tier 2 eligible. ▪ Utilities have developed training materials for Customer Service Representatives (CSR) to communicate about the programs to those with financial/payment problems. There is a specific group of CSRs identified to handle this. ▪ There is also training for CAA representatives to learn how to use the portal and to sign people up. ▪ The 10/11/23 decision requires the utilities to host in-person events with CSRs and CAA representatives attending to inform and enroll customers at the event.
New Hampshire EAP	<ul style="list-style-type: none"> ▪ DOE and CAA websites. ▪ DOE has a contract with a digital marketing firm that does radio ads, on-line ads, streaming ads. It is a robust outreach program.
New Jersey USF	<ul style="list-style-type: none"> ▪ Certification forms are sent to all who qualified the previous year. DCF does outreach. State agencies have utility assistance week. The utilities do the bulk of outreach to customers in arrears. This includes mailings, call center contacts, outreach events where the application agencies also attend. Every discontinuance notice during heating season has to include USF info.
Ohio PIPP Plus	<ul style="list-style-type: none"> ▪ PUCO, Utility, and DoD websites. ▪ PUCO has outreach through public affairs and its low-income division. They attend events where they promote PIPP. Website and brochures. ▪ Utilities are required to advise customers that are struggling to pay about PIPP. They also use information inserts with bills and

State	Data
	disconnection notices.
Vermont EAP	<ul style="list-style-type: none"> ▪ DCF and GMP websites though the latter just points to DCF's. ▪ For DCF, the CAAs, area agencies on aging staff, and district offices staff all are encouraged/trained to promote the program. ▪ GMP uses their website; social media posts; notices with bills; and the customer care team discusses with customers, especially if the call concerns billing.

Annual Admin Costs/FTEs/Level of Effort

State	Data
Maine LIAP	<ul style="list-style-type: none"> ▪ PUC does not separate them out, just part of their jobs. MH received \$291,000 in admin costs this year which they use to pay the CAAs. Estimate 1–3 FTEs depending on changes or other extra work requirements. ▪ Versant estimates 1-2 FTEs. They don't really track LIAP program costs, only the arrearage program costs. ▪ CMP, with its automated system, has very low costs. But if changes are needed, this is therefore more expensive. Update: CMP estimates 1 FTE for LIAP/AMP together. They pay CAAs approx. \$20K to process applications and provide financial assistance. They pay MH approx. \$215K for Electricity Lifeline Program admin costs. Most CAAs are not able to provide financial coaching due to staffing constraints.
Connecticut LIDR	<ul style="list-style-type: none"> ▪ Admin costs are captured and recovered through the SBC and trued up through the RAM. ▪ There was an original estimate for FTEs for ongoing LIDR implementation and ongoing support but there has not been anything more specific yet. ▪ Payments made to CAAs for 2021–2023 by each utility are as follows: <ul style="list-style-type: none"> ○ Eversource – \$603,805 ○ Avangrid – \$12,480
New Hampshire EAP	<ul style="list-style-type: none"> ▪ For 10/1/21–8/31/22, ~\$1.6M for admin costs for CAAs and utilities. ▪ All admin budgets proposed by the CAAs are reviewed/approved by the PUC. See the PUC website for the most recent budgets filed. See each utility budget including allocation and CAA budget. The admin costs have been ~ \$1.8M recently. ▪ The utilities contract the CAAs and pay the CAA costs and have their own costs paid through the SBC.

State	Data
	<ul style="list-style-type: none"> DOE is not pursuing a connection with DHS; not sure if the CAAs are but they were recommended to.
New Jersey USF	<ul style="list-style-type: none"> 2022–23. Electric \$7,263,714 to DCA; \$3,307 for utility postage and handling. DCA and some utilities expenses are paid from the USF fund, but most utilities costs are paid through base rates. There is no reimbursement from USF for NJBPU.
Ohio PIPP Plus	<ul style="list-style-type: none"> For DoD, the PUCO reps were not sure how many FTEs are involved. PUCO works with at least 10–15 people at DoD who work on this. However, they also do HEAP and home weatherization. They have multiple programs, so not sure how many are just PIPP. The utilities have PIPP people as part of their consumer invoicing and billing department.
Vermont EAP	<ul style="list-style-type: none"> DCF's contract is for \$175,000 per year which includes salary and benefits for staff that determine eligibility and other costs such as postage and envelopes for mailing determination letters and renewal applications. State employees at DCF do the work, not CAAs. DCF employees do all the assistance programs including SNAP, LIHEAP, etc. CAAs do crisis assistance and weatherization under contract with DCF. Very minimal effort for GMP. It's just part of the job and takes little time for the billing team to turn the program on or off (computer process). Estimate is ¼ FTE/year, and that may be high.

Manual Processes

State	Data
Maine LIAP	<ul style="list-style-type: none"> Part of the LIHEAP process, including the interview. However, different utilities have different processes. CMP is fully automated and developed a portal the CAA logs into which connects with the CMP system and determines eligibility. Versant Power (less digital) gets a weekly file on Fridays from CAAs with enrollments, customer account numbers and names. They then enroll them in their system.
Connecticut LIDR	<ul style="list-style-type: none"> Can complete the application manually and submit or go for interview at CAA or OF and they will complete and submit through a utility portal.
New Hampshire EAP	<ul style="list-style-type: none"> Enrollment is manual. (1) Call local CAA to make an appointment. (2) Go to the appointment with docs instructed to bring. Can enroll in person, on-line, or through the mail. Have to present

State	Data
	<p>documentation.</p> <ul style="list-style-type: none"> There are EDI transactions every day between CAAs and the utilities, but DOE is not involved with those. The (utility or CAA, not sure) file reports with DOE using their electronic system or by email.
New Jersey USF	<ul style="list-style-type: none"> Data entry by agencies is manual but they are starting to use AI which is reducing time. AI use example: an online application with a document upload. The AI can read and pull info from the document (maybe a utility bill) and feed it into the system. Also, information from food stamps applications frequently has incomplete data but AI can pull from other databases to populate the missing fields. Makes it easier for both CAA and the applicants.
Ohio PIPP Plus	<ul style="list-style-type: none"> First time applicants for PIPP must make an appointment at a CAA to complete the application and provide proof documents.
Vermont EAP	<ul style="list-style-type: none"> As noted above, the enrollment process is all manual for DCF including tracking qualifications using an Excel spreadsheet. The process is: call for or download the application, complete and mail with copy of electric bill. (Note, however, that if they want additional documents, there is a document uploader at the DCF site). DCF emails the data of eligible households to GMP each day.

Future Changes to Funding and Source(s)

State	Data
Maine LIAP	<ul style="list-style-type: none"> The legislature authorized an additional \$7.5M for 2023–24 and 2024–25. However, it has not yet been established how this money will be spent (whether more people eligible or increased benefit payments).
Connecticut LIDR	<ul style="list-style-type: none"> While there are no planned changes yet, PURA has directed the EDCs to submit as a compliance filing a report on LIDR customer verification and enrollment success to date. PURA is concerned with LIDR eligibility verification and enrollment while there is still no opt-out data-sharing agreement between the EDCs and DSS.
New Hampshire EAP	<ul style="list-style-type: none"> Due to the recent fast rise in electricity prices, HB 2023 was signed in Sep 2022 and provided a \$7M infusion to the EAP fund. It is expected to allow continued payment of benefits through the end of August.
New Jersey USF	<ul style="list-style-type: none"> These are new procedures beginning 10/2/23. No other changes planned.

State	Data
Ohio PIPP Plus	<ul style="list-style-type: none"> No planned changes provided.
Vermont EAP	<ul style="list-style-type: none"> As the eligibility and rates just changed this year (2023), nothing else currently planned.

**State of Maine
Office of the Public Advocate**



**Arrearage Management Program Report
December 1, 2023**

OPA Report to ERAC on Future of AMP

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I. Introduction

Maine’s Arrearage Management Program (AMP) is one of several low-income programs, along with the Low-Income Assistance Program (LIAP) and the Low-Income Heating Assistance Program (LIHEAP), that each support electricity customers in a unique way. AMP provides financial assistance and on-time bill payment incentives to eligible customers. Specifically, low-income customers with significantly past-due balances (accumulated arrears) who pay monthly usage charges on time receive a monthly credit towards their arrears as long as they remain in compliance with the terms of the program. In addition, AMP participants have access to a complementary energy efficiency program from Efficiency Maine Trust to help reduce their energy consumption.

This program has improved the lives of low-income Mainers. Since September 2021,¹ 915 Mainers have successfully completed AMP, meaning that they complied with the terms of AMP such that their entire arrearage was forgiven.² Recent data³ show that the need for this program is growing, where participation in the 3rd quarter of PY 2022-23 Q3 jumped 242%, 65%, and 171% above participation in the 3rd quarter of PY 2021-22 Q3 for Versant – Bangor Hydro District (BHD), Versant – Maine Public Service District (MPS), and Central Maine Power (CMP), respectively. Since AMP began in 2015, 2050 participants had their entire arrearage forgiven.⁴ The total amount of arrearage forgiven was \$5,510,358.43.

The statute enacting AMP, Title 35-A Section 3214(2-A), has a built-in “sunset provision” meaning that on September 30, 2024, Maine’s AMP program will automatically end unless the statute is amended to remove the sunset provision. In the meantime, no later than January 28, 2024,⁵ the Maine Public Utilities Commission (the Commission or the PUC) must prepare a report assessing the effectiveness of the utilities’ AMP programs.⁶

¹ The beginning PY 2021-22 Q1. The AMP program year (PY) is October 1-September 30.

² There were 248 and 667 for Versant (formerly Emera Maine) and CMP, respectively.

³ T&Ds with AMP programs are required to file quarterly reports.

⁴ Summarized from AMP quarterly reports filed by the T&Ds with the PUC.

⁵ 35-A M.R.S. § 3214(2-A)

⁶ Only the investor-owned utilities are required to implement an AMP program. 35-A M.R.S. § 3214(2-A).

The purpose of this report is to update the Electric Ratepayer Advisory Council on the status of AMP.

II. Description and Support for AMP

A. The AMP Approach

AMP provides relief to low-income customers with arrears on their utility bills. These customers may be able to pay for their monthly usage but cannot afford the extra expense of paying off the arrears. To put it simply, these customers can keep up, but they can't catch up. Rather than keeping these vulnerable customers in a situation where they are eventually faced with disconnection, and putting the utilities in a situation where they are owed amounts that will likely never be paid, AMP creates a positive relationship and a communication channel between the customer and the utility, leading to a mutually beneficial outcome.

AMP enrollment is also an opportunity to inform customers about other programs and services that can help make their bills more affordable. All AMP participants receive a free “Electricity Usage Assessment” performed by the Efficiency Maine Trust⁷ and must accept the free energy management measure and programs offered by the utility, EMT, and the MSHA. For example, between July 1, 2022 and June 30, 2023, EMT has helped 69 AMP customers to install new heat pump water heaters in their homes, thereby reducing their dependence on costly fossil fuel.⁸ All AMP enrollees receive Efficiency Maine Energy Efficiency Tips⁹ booklets in the mail.

The risk of future disconnection can be reduced through AMP. Even if the participant does not complete the entire program, but makes some monthly payments, the amount of the arrearage will be permanently reduced, thereby decreasing the financial pressure of trade-offs between necessary heat, food, medication, on the one hand, and electricity, on the other.

⁷ 65-407 C.M.R. ch. 317, § 3(C)(6).

⁸ *Efficiency Maine*, Low-Income Advisory Group Meeting Presentation, September 7, 2023.

⁹ <https://www.efficiencymaine.com/docs/Energy-Efficiency-General-Education-Booklet-FNL.pdf>

B. How It Works

AMP began in 2014, when the Legislature launched an AMP pilot, Title 35-A M.R.S. Section 3214(2-A), which was followed by rulemaking in 2015 at the PUC to create Chapter 317 - “Statewide Arrearage Management Program.” All the participating T&D utilities can recover in rates all the costs of its AMP program including incremental costs, reconnection fees and administrative and marketing costs, but not including the amount of any arrearage forgiven that is treated as bad debt for purposes of cost recovery.¹⁰

The program works as follows:

- A customer falls behind by at least \$500 for at least 90 days.
- Up to \$3,600 of the customer’s overdue arrearage can be forgiven per year.
- For each month the customer makes a full payment of their current bill, 1/12th of their amount in arrears, up to a maximum of \$300, is forgiven. If the customer remains on the program for a full year, the full amount is forgiven up to \$3,600.
- The customer may remain on the program for more than one year until the full amount of the overdue arrearage has been forgiven, but they must reapply every 12 months.
- Rather than a direct payment, AMP benefits are earned through on-time payment behavior. Debt is only forgiven when on-time payments are made.
- The program is only offered to CMP and Versant Power customers. The other T&D utilities are able to participate, but none are doing so currently.

Currently, there are two open PUC proceedings that will affect AMP. First, on June 9, 2023, the Office of the Public Advocate (OPA) filed a request for the Commission to recommend four amendments to Chapter 317 (Docket No. 2023-00134) supported by ERAC¹¹ to: 1) allow participants to miss two payments before disqualification from the

¹⁰ 65-407 C.M.R. ch 317, § 5.

¹¹ The Electric Ratepayers Advisory Council.

program; 2) allow a ratepayer to participate once every seven years rather than once in a lifetime; 3) allow all LIAP-eligible ratepayers to qualify for AMP; and, 4) increase the maximum monthly AMP benefit to \$500 a month (which increases the total amount eligible for forgiveness to \$6,000 a year). The Commission added its own proposal to make changes to the enrollment process to clarify the start date when bill payments qualify for AMP and also proposed to add certain tracking and reporting requirements.¹² A Public Hearing on the proposed amendments was held on September 27, 2023, at the Commission, and a final order should be issued soon.

Second, in anticipation of the January 28, 2024, report that it is preparing, the PUC has opened an inquiry to seek public comment on AMP and to collect additional information from the T&D utilities on AMP participant patterns and administrative costs (Docket No. 2023-00239.) A stakeholder meeting will be held on December 6, 2023, and final comments are due December 20, 2023.

C. Support for AMP from the Utilities

OPA has discussed the future of the AMP program with a number of interested parties. The following are some of the more noteworthy comments:

In the words of Maine's two utilities whose customers benefit from AMP:

“The Arrearage Management Program provides a valuable opportunity for Mainers who have been through a difficult time and built up an arrearage with their utility company that’s just too much for them to manage. It’s a chance to keep up with their current bills while the program catches up the arrearage for them, forgiving some of the arrearage every time a current monthly bill is paid on time.”

- Linda Ball, Vice President, Customer Service, CMP

“There are no other holistic debt forgiveness programs out there like this.” “The AMP program provides a second chance for customers who have fallen behind on

¹² If customer already have a current, unpaid bill and they are enrolled in AMP, that unpaid balance will not be included in the arrearage total.

their utility bills. Simply by keeping current on their monthly bills, a customer can become debt free over time. But it's not only that- In addition, the customer is eligible for financial coaching from the agencies, which benefits the customer not only in the AMP program but with other monthly budgeting situations they face. Customers in the AMP program also get the support of Efficiency Maine, who looks for ways to improve the customer's usage in order to bring their monthly bills down."

- Lisa Henaghen, Manager of Billing & Payments, Versant Power.

D. Support for AMP from Low-Income Household Advocates

The utilities are not the only entities in the State to see the benefit of the program – low-income advocates see AMP's role as part of the suite of tools and programs to support low-income Mainers as crucial:

"The Maine State Housing Authority (MSHA) administers state and federal programs that provide rate relief for Maine's low-income utility ratepayers. With bills as high as they've ever been, we believe that the Arrearage Management Program works together with LIAP to create a lifeline for folks who have fallen behind on their electric bills. We support continuing the Arrearage Management Program."

- Erik Jorgensen, MSHA

"At Maine Equal Justice, I advocate alongside Mainers with low income who face rising electric bills that have put an untenable burden on their households. The Arrearage Management Program is a lifeline because it allows customers with low-income who have fallen behind in their bills an opportunity to become current and avoid disconnection. I support continuing the Arrearage Management Program."

- Ann Danforth, Maine Equal Justice Partners

"At AARP Maine, we advocate for Maine's elderly ratepayers. With today's sky high price of electricity, it is clear that many of our elderly are struggling to pay their electric bills and some of them are falling behind in their payments, through no fault of their own. The Arrearage Management Program gives these consumers an opportunity to dig out of their stressful financial predicament by making on time

payments of just the current amount due. Accordingly, AARP Maine strongly supports continuing the AMP program.”

- Noël Bonam, AARP Maine State Director

E. Anecdotes from Those That Have Successfully Completed AMP

In the nearly 10 years since its launch, thousands of low-income ratepayers have benefitted from utilities forgiving at least some of their past-due bills through the AMP. This can be life-changing help for Mainers facing tough times, like:

- **Tori T.**, who unfortunately faces multiple medical conditions, along with a brain injury that caused memory issues. Upon approval for AMP, Central Maine Power also helped her sign up for autopay so she could keep on track despite multiple hospitalizations, and she successfully completed the program and prioritizes making her CMP payments to this day despite the other challenges she’s facing.
- Versant customer **Mary B.** has now become a customer in good standing after enrolling in the AMP program in March 2022 with a substantial past due balance and paid monthly bills averaging \$300. Over the past year, she made several calls to Versant with questions regarding her consumption, which she had no previous history of doing so prior to enrolling in AMP. She also called Versant to make her monthly payments over the phone so she could verify they went through so she would not jeopardize her enrollment in the AMP program. She had good credit for 12 months and recently received her deposit plus a small amount of interest back. She successfully completed the AMP in March 2023 and was still current on her account, five months later.
- When electricity prices dramatically increased in January of 2023 due to skyrocketing natural gas prices and other factors, current AMP participant **Amelia**¹³ fell behind with her electric bill. “Our electric bill had quadrupled from when we first moved here, and we just couldn’t afford \$800 electric bill every month on top of the

¹³ Name changed to protect anonymity.

mortgage,” explained Amelia. “CMP got me set up on this program, and now I’m paying toward my electric bill on every pay day—it’s really helped out a lot. Sometimes people get into situations outside of their control, and they need a little forgiveness.”

- Similarly, AMP graduate **Jerry**¹⁴ found himself behind on his electric bill when both he and his wife suffered career impacts due to the COVID pandemic. “The pandemic really adversely affected our incomes in a tremendous way – my wife lost her job where she’d been working for five years, and the pandemic also hit me hard in terms of being able to sell my work as a writer,” said Jerry. Then the furnace broke. “For two winters, we couldn’t afford to replace our furnace and fuel tank, so we were using multiple space heaters to keep the house from freezing – we closed off half the house and wore thick sweaters, but we still needed some heat to make it through the winter,” Jerry explained. Jerry was able to apply for LIHEAP and got help getting his furnace replaced—but still had a large amount of past-due electric bills hanging over him. Working with his local Community Action Agency, Jerry was able to apply for AMP after being approved for LIHEAP, where over time, his debt has now been forgiven. “I can’t even begin to say how important AMP has been to me and my wife. It’s life-changing and potentially life-saving, but at the same time it has built in safeguards for the providers because if the person doesn’t make the payments, they’re off the program. It’s a win-win for everyone.” Jerry, originally from New York, is not surprised there’s a program like AMP in Maine. “In Maine, you can live your life in a caring community—that’s what drew us to Maine 25 years ago. People try to help each other here.”

III. What Other States are Doing

Maine is not the only state to recognize the benefits of an AMP. Many other states offer AMP to utility customers, among them Connecticut, Massachusetts, Rhode Island, Ohio, Pennsylvania, Illinois, Maryland, and California. In addition, Vermont’s Green

¹⁴ Name changed to protect anonymity.

Mountain Power forgives all arrears once a ratepayer qualifies for the state's Energy Assistance (this is a one-time opportunity.) Of note:

- In Rhode Island, ratepayers for Rhode Island Energy who qualify for LIHEAP can participate in what's called the "Forgiveness Program," if they have a balance of at least \$300 that's more than 60 days past due. If participants make payments on time, a portion of their past-due amount will be forgiven, up to \$1,500 per year.
- In California, eligible SoCal Gas customers can get up to \$8,000 forgiven per enrollment period if they participate in the AMP, as they pay up to 12 months of bills in full and on time.
- Connecticut's Fresh Start program for income-eligible EverSource electric customers forgives up to \$20,000 annually, wiping up 1/12th of their debt with each on-time payment made.
- All Massachusetts utilities have some form of AMP, for LIHEAP or low-income eligible ratepayers who owe at least \$300 in overdue bills, are up to 6 months past due on their bill, agree to a payment plan, make payments on time, as well as participate in budget counseling and EE programs. Benefits vary by utility, but most set up an affordable payment plan for past due and current charges, won't disconnect service for non-payment if the payment plan is followed; and forgive part or all of client debt if payment plan is followed and forgive all or part of a client debt up to \$1,500 - \$2,000 if payment plan is followed.
- In Maryland, Arrearage Retirement Assistance helps customers with large, past due electric and gas bills. If eligible, customers may receive a grant for up to \$2,000 towards their past due bill. Customers must have a past due bill of \$300 or greater to be considered eligible. Customers may only receive an arrearage grant once every five years, with certain exceptions.
- Ohio has an AMP for both gas and electric utilities as part of its Percentage of Income Payment Plan (or PIPP) Plus low-income program. PIPP Plus customers must apply for the regular Home Energy Assistance Program (HEAP) and the Home Weatherization Assistance Program (HWAP). In addition to paying utility bill

amounts based on their income, PIPP Plus customers earn 1/24th credit on their outstanding arrearage for on-time and in-full payments.

IV. AMP vs. Bad Debt

When electricity bills go unpaid and it is determined they will not be recovered, utility companies roll the unpaid bills into bad debt. This bad debt expense is then recovered through the ratemaking process where the T&D utilities are allowed to include their test year's total bad debt expense in rates. Bad debts include both the T&D portion of unpaid bills as well as the standard offer supply portion. Portions of unpaid electricity bills that are due to supply purchased through a Competitive Electricity Provider (CEP) are not included in this process.

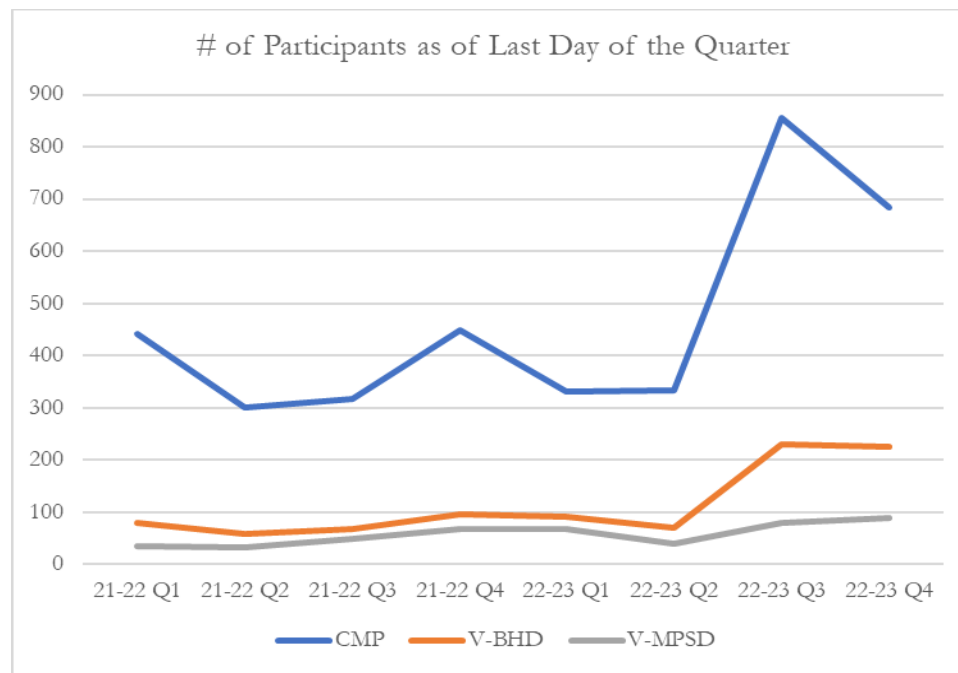
Like unpaid bills, amounts of arrearage that are reduced as part of the Arrearage Management Program are also rolled into bad debt and recovered through the ratemaking process. When a participant is issued a credit on their unpaid balance, the credited dollar amount is moved to bad debt and recovered through the ratemaking process as described above. As with non-AMP unpaid bills, any portion of an AMP participant's bill that is due to supply purchased from a CEP will not be credited as part of the program and will not be moved to bad debt. The AMP program is important to establishing a positive relationship between the utilities and customers who are behind on their bills. CMP acknowledges the program "is intended to cost-effectively and sustainably improve the payment behavior of residential customers who qualify for LIHEAP and are in arrears on their electricity bills."¹ If the program gets participants in the habit of making regular payments, the risk of missed future payments is reduced, and in turn the overall level of bad debt that ends up being recovered in rates by all customers is reduced.

Relative to the total amount of bad debt that results from unpaid electricity bills, the portion attributable to AMP is very small. For the 5-year period from January 1, 2018, through December 31, 2022, AMP on average accounted for just 3.35% of all residential bad debt and 3.05% of total bad debt (including non-residential) for CMP. As of October 23, 2023, the calendar year-to-date average shows AMP accounting for 4.80% of residential bad debt and 4.36% of total bad debt for CMP.

V. Statistics from the Maine Utilities

Since AMP began in 2015, 2050 participants have successfully completed the program such that their entire arrearage was forgiven.¹⁵ The total amount of arrears forgiven was \$5,510,358.43.

Between PY 2021-22 Q1 and PY 2022-23 Q2, the average number of AMP participants was 77, 49, and 362 for BHD, MPS, and CMP, respectively. Participation in PY 2022-23 Q3 jumped 242%, 65%, and 171% above participation in PY 2021-22 Q3 for BHD, MPS, and CMP, respectively.

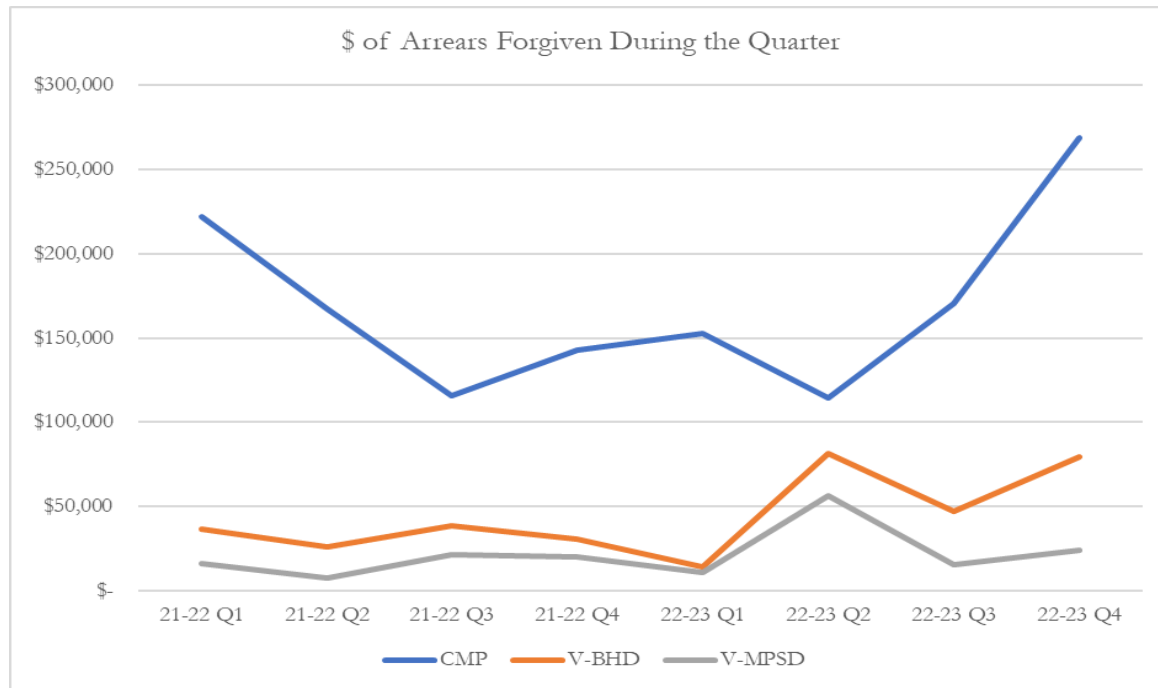


Between PY 2021-22 Q1 and PY 2022-23 Q4, the average total amount of arrears forgiven¹⁶ in each quarter was \$44,352.69, \$21,624.33, and \$169,381.82 for BHD, MPS, and

¹⁵ Summarized from AMP quarterly reports filed by the T&Ds with the PUC.

¹⁶ The sum of funds applied to the arrears of all participants.

CMP, respectively.



During PY 2021-2022 the total amount of arrears forgiven was \$132,234.33, \$65,692.48, and \$648,533.33 for BHD, MPS, and CMP, respectively. The total arrears forgiven for all 3 T&Ds was \$846,460.14 in PY 2021-22 and \$1,036,410.51 in PY 2022-23.

Total \$ Arrears Forgiven				
	CMP	V – BHD	V - MPSD	Total
PY 2021-22	\$648,533.33	\$132,234.33	\$65,692.48	\$846,460.14
PY 2022-23	\$706,521.20	\$222,587.15	\$107,302.16	\$1,036,410.51

Between PY 2021-22 Q1 and PY 2022-23 Q4, the number of participants who successfully completed AMP such that their entire arrearage was forgiven was: 155, 93, and 667 for BHD, MPS, and CMP, respectively.

Individual Participant Success

CMP		V - BHD		V - MPSD	
Completed 12m	All Arrears Forgiven	Completed 12m	All Arrears Forgiven	Completed 12m	All Arrears Forgiven

21-22 Q1	56	61	11	11	7	6
21-22 Q2	72	114	27	26	8	8
21-22 Q3	68	183	37	37	15	15
21-22 Q4	19	19	4	4	0	0
22-23 Q1	26	33	44	4	4	3
22-23 Q2	186	190	4	65	7	58
22-23 Q3	38	39	4	4	1	1
22-23 Q4	26	28	6	4	2	2
Total		667		155		93

VI. Conclusion

Mainers are barraged by multiple, alarming economic stressors that challenge their ability to keep current with household expenses. An unfortunate result is that they fall behind on paying their electric bills. Even if they are able to recover their financial stability, they may still be unable to pay off the overdue balance (arrearage) they have amassed and thus continue to face the threat of disconnection. The AMP program gives low-income customers a chance to reduce those unpaid amounts, and even to have their arrearage forgiven entirely if they consistently comply with the program terms. They are also put in contact with Efficiency Maine Trust to help reduce their energy consumption. AMP is a relatively small, but valuable program that has assisted low-income families for 10 years.

The data summarized in this Report, especially from the current AMP program year, demonstrate both how the program has helped low-income customers and growing importance of the program. The testimonials from the utilities, low-income advocates, and successful AMP participants reflect its high value. The AMP program alone will not produce a large reduction in Maine poverty, but it is one important piece of a network of government programs that collectively will relieve a substantial portion of the economic hardship and burden on low-income Mainers.

The OPA recommends that the Council support continuation of this important program by removing AMP's statutory "sunset provision."