Washington State Department of Commerce

Statewide Monthly Low-Income Energy Assistance Program Design

Submitted pursuant to Sect. 132(11) of Chapter 475, Laws 2023

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Report to the Legislature

Director Mike Fong

ENERGY POLICY OFFICE

Acknowledgments

Washington State Department of Commerce
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Table of contents

Highlights of recommended program design elements **5**

Key benefits of the recommended program design **6**

Context **7**

Executive summary **8**

Introduction **12**

Recommended program design **17**

Recommended program design process **32**

Energy burden and assistance need in Washington **51**

The impacts of energy burden on households **57**

Disproportionately impacted households **69**

Gaps in energy affordability protections for low-income households **76**

Washington's patchwork of utility bill assistance programs **82**

Alternatives under a utility-by-utility approach **92**

Conclusion **98**

Appendix A: Definitions **99**

Appendix B: the Low-Income Energy Affordability Data (LEAD) Tool **100**

Appendix C: The Residential Energy Consumption Survey **102**

Appendix D: RCW 19.405.120 (2019) **103**

Appendix E: RCW 19.405.120 (Sec. 120) Analysis **105**

Appendix F: Centering lived experiences **116**

Appendix G: Household surveys **118**

Appendix H: Community Organization Listening Sessions Summary **126**

Appendix I: Program design principles and the recommended program design summary **140**

Appendix J: Survey of utility programs and webpages **142**

Appendix K: Bill discount mechanisms **162**

Appendix L: Data sharing to streamline enrollment **164**

Appendix M: Funding options **167**

Appendix N: Caseload Forecast Council 170

Appendix O: Benefit cliffs 171

Appendix P: Best practices in social service program design 175

Appendix Q: Categorical eligibility for a statewide low-income energy assistance program 182

Appendix R: Department of Commerce outreach and community engagement 185

Appendix S: DSHS outreach and community engagement 188

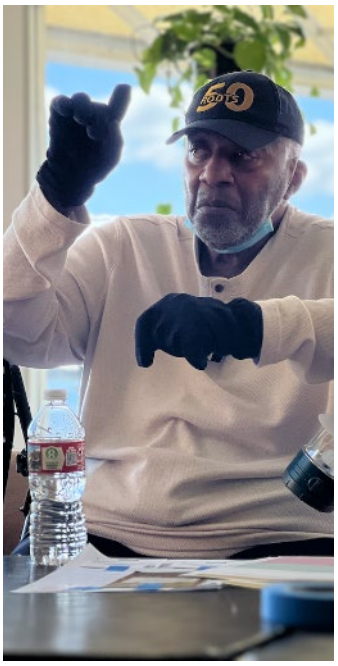
Appendix T: Opportunities for partnership and lessons learned from Department of Children, Youth, and Families Outreach 191

Appendix U: Office of Superintendent of Public Instruction outreach and community engagement 192

Appendix V: Employment Security Division outreach and community engagement case study 194

Appendix W: Acknowledgements 196

Highlights of recommended program design elements





Establishes universal access to monthly low-income energy bill assistance targeted to meet each household's energy assistance need.





- Maintains income criteria under existing law and administrative rule, which defines "low income" as the greater of 80% of area median income or 200% of the federal poverty level, adjusted for household size.
- Allows for streamlined income eligibility determination, including verification of a household's participation in other state means-tested programs for which eligibility does not exceed the low-income definition for the statewide monthly low-income energy bill assistance program.
- Offers a monthly income-tiered bill discount where benefit amounts are targeted to address energy assistance need.
- Provides a graduated benefit level that decreases as household income rises. No sudden drop in benefit or arbitrary income threshold.
- Builds on existing relationships and forges new ones with households and community-based organizations through consistent, co-created communications and community outreach plans that respect the unique needs of households and communities.
- Incorporates the desires of low-income households and national best practices in social service and human-centered design within system constraints.
- Supports education about the benefits of conservation and helps connect households to other social services and energy programs.
- Embeds ongoing program evaluations that include metrics to track equitable access, effective delivery, and compassionate integrity of the program.
- Includes a statewide advisory group to help oversee program implementation and evaluation.

Key benefits of the recommended program design

Universal access to low-income monthly energy bill assistance with uniform benefits for similarly situated households









- Highly visible program available to all low-income households statewide.
- Benefit levels targeted to meet household need and providing gradual reduction in benefits as household income rises.
- Consistent communication about program eligibility, enrollment, and benefits to facilitate sharing about the program by word of mouth and direct referrals.
- Streamlined, user-friendly applications and enrollment processes.
- Households enrolled in another state low-income program need not submit additional income documentation.
- No wrong door for accessing assistance — households can enroll online, over the phone, or in person at any community organization offering assistance to low-income households.
- Ability to self-check enrollment status, track progress over time, and chat with a customer service representative.
- Program participation does not affect eligibility for other social service programs, because it does not affect household income.
- Leverages existing communications with low-income households and service providers to raise program awareness.
- Increased awareness about other low-income energy programs and the benefits of conservation through program messaging.
- Reduces the inefficiencies of administering more than 50 separate monthly bill assistance programs across Washington's electric utilities.

Context

Low-income households in Washington face significant energy assistance need.







- More than 270,000 low-income households in Washington (25% of all low-income households) are energy burdened—that is, they spend more than 6% of their household incomes on residential energy bills.
- On average, these households spend $1,016 per year in excess of the 6% energy burden threshold. This figure reflects the comparatively low electric rates of many Washington utilities.
- The total statewide energy burden of low-income households is $275 million after taking the comparatively low electric rates of many Washington utilities into account.
- Nearly a fifth (about 17%) of low-income households in urban counties are energy burdened, and nearly two fifths (38%) of low-income households are energy burdened in rural counties.
- Energy assistance need is not a “standalone” issue, but rather impacts other major societal challenges such as housing stability, financial stability, food insecurity, physical and mental health, and broader public problems.
- Rising outdoor temperatures and subsequent interior cooling demands will exacerbate household energy burdens.
- Washington’s 50+ electric utilities are responsible, under Washington law (RCW 19.405.120), for implementing programs to address the energy assistance need of the low-income households.
- Participation rates in utility assistance programs vary widely, but in all cases are low compared to statewide programs with comparable eligibility requirements, such as the Supplemental Nutrition Assistance Program.
- The patchwork of benefit levels and eligibility standards across 50+ utility programs places an undue burden on households and community organizations seeking information about assistance, as well as community organizations trying to serve households.
- A low-income household must navigate fragmented and vastly different enrollment processes depending on their electric utility, and may not have access to monthly energy bill assistance.
- Low-income households in one utility service area may receive significantly different benefits than a similarly situated household in another utility service area.
- Rural electric utilities with a disproportionate share of low-income households face significant challenges meeting energy assistance need within the rates paid by other customers, some of whom are themselves low-income households

Executive summary

Overview

More than 270,000 low-income households in Washington (about 25% of low-income households) spend more than 6% of their annual household incomes on home energy bills. The average amount they spend above 6% of their household incomes on home energy bills is $1,016 annually. These expenditures annually exceed $275 million statewide. These costs include residential electricity, natural gas, propane, and other home heating and fuel costs, and they reflect the comparatively low electric rates charged by many Washington utilities. They do not include transportation-related costs.

This is a significant energy and housing problem. Households that spend over 6% of their incomes on residential energy bills are more likely to leave the temperature of their homes at unhealthy and unsafe levels, forgo other basic necessities, like essential food and medicine, and are more likely to lose their housing and remain in cycles of poverty.

Energy assistance programs reduce the likelihood of these harms, but Washington's current energy assistance system is a patchwork of utility energy assistance programs with many holes where crucial programs and funding remain absent. These programs serve only a small percentage (roughly 25%) of low-income households compared to individual statewide programs, such as the Supplemental Nutrition Assistance Program (SNAP), that have similar eligibility requirements.[1] These programs are described below in Washington's patchwork of low-income energy assistance programs.

Layered over this patchwork of utility programs is a federal block grant program, the Low-Income Home Energy Assistance Program (LIHEAP), and a few relatively small state programs that offer limited assistance to low-income households and often prove inaccessible to households due to limited funding, and restrictive eligibility and program design requirements mandated by the federal government.

The Legislature, in a 2023 budget proviso (Sect. 132(11) of Chapter 475, Laws 2023), directed Commerce to recommend a design for a statewide low-income energy assistance program to provide universal access to home energy assistance and meet energy assistance need. The Legislature asked Commerce for this recommendation because of the high level of energy assistance need, low participation rates in utility programs compared to statewide programs with similar eligibility criteria, and fragmentation of programs and communications across Washington's electric utilities, which have varying levels of resources.

The report and recommended program design are rooted in the perspective of serving low-income residents of Washington and so are "people first." The recommended program design is based on input received over the past year from hundreds of individuals from community providers, utilities, state agencies, environmental justice advocates, and households across Washington. It is informed by national best practices and the expertise and lived experiences of low-income households and community organizations, and input of statewide low-income advocates, utilities, and sister state agencies

[1] 2023 Energy Assistance Report

The recommended program design would…

- Provide universal access to monthly low-income home energy assistance to meet energy assistance need regardless of their utility or home fuel source
- Have one name and brand to be universally recognizable to low-income households and community organizations
- Strengthen existing relationships and forge new ones with community partners who serve low-income households
- Allow households to enroll in person at community organizations that serve low-income households, over the phone, or online
- Reduce the inefficiencies of administering 50+ separate monthly bill assistance programs across Washington's electric utilities
- Rationalize and simplify the accumulated layers of policy and process, and bring in new technology and user-friendly, human-centered design to provide increased awareness and accessibility to monthly bill assistance for households

Recommended program design

Under the recommended program design, every low-income household would have access to a highly visible monthly energy bill assistance program that would deliver monthly bill discounts to address excess home energy costs, which are home energy costs above 6% of household income. Household size and cost of living differences across Washington would be factored into determining the income eligibility of the household. Households enrolled in other state low-income programs would not need to submit additional income documentation.

Households would be able to enroll in minutes online, over the phone, or in-person at any community organization offering assistance. The program would offer streamlined, user-friendly applications and enrollment processes, and may provide households to self-certify their household income, while maintaining program integrity. Services would be provided in multiple languages.

Households would receive consistent communications about program services through networks of community-based organizations across the state and the state administrator. The recommended program design would enable the state to reach out directly to households already enrolled in statewide low-income programs to enroll them in the statewide program.

Households not enrolled in statewide programs would be connected to services through the state administrator building on existing and forging new relationships with households and community-based organizations through consistent, co-created communications and community outreach plans that respect the unique needs of households and communities. Program communications would raise awareness about other low-income social service and energy programs, and the benefits of conservation.

At the center of the recommended program design is the belief that households deserve efficient, quality, and equitable energy bill assistance programs. Continuous program evaluation would be an integral part of a statewide low-income monthly energy bill assistance program to ensure it is meeting the needs of low-income

households in a timely and equitable manner. The program would have a formal advisory group of a diverse set of households, community organizations, utilities, and national experts to provide input on key decisions standing up a program and overseeing program performance and recommendations. Regular check-ins would occur with community organizations in different regions of the state to share best practices and provide feedback on the program.

Most low-income households are not enrolled in utility energy bill assistance programs, despite significant energy assistance need. A statewide approach would relieve electric utilities responsibility under current law to address the total home energy burden of low-income households, and avoid the inefficiencies of administering more than 50 unique monthly bill assistance programs across Washington's 50+ electric utilities to meet energy assistance need, replacing a patchwork of utility bill assistance programs and fragmented communication process with a universal monthly energy bill assistance program responsive to the unique needs of low-income households.

Commerce evaluated other approaches that either layer additional policy requirements on utilities or push more funding through existing programs. Commerce found considerable drawbacks to each of these approaches that would undermine the ability of households to access monthly bill assistance programs. The benefits and drawbacks of the alternative approaches is summarized in Table P: Policy layering and supplementary funding approaches.

Conclusion

Low-income households are essential workers, single mothers, seniors, disabled persons, immigrants, tribal members, and other members of our shared Washington community. Home energy costs have a disproportionate impact on the household budgets of low-income households. Low-income households are disproportionately energy burden and disproportionately suffer from energy insecurities, such as forgoing essential necessities, such as food and medicine, to pay their home energy bills or keeping their home temperatures at unhealthy levels. Climate change, rising temperatures, and subsequent cooling demands will exacerbate household energy burdens and prove deadly for some.

Washington's current laws and utility programs are not equipped to address energy assistance need systemically or equitably. Washington's current laws are discussed in the report section Gaps in energy affordability protections for low-income households.

The Legislature first encouraged electric utilities to offer bill discounts nearly 50 years ago.[2] In 2019, the Legislature enacted Sec. 120 to address the full home energy burden of low-income households. The law puts the obligation of addressing energy assistance need directly on electric utilities. Two years later, the Legislature required Washington's three investor-owned electric utilities to redesign their assistance programs. Those redesigned bill assistance programs were launched in the latter half of 2023 with additional investor-owned utility programs being launched in October 2024.[3]

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[2] RCW 74.38.070: Reduced utility rates for low-income senior citizens and other low-income citizens. (wa.gov)

[3] In 2023, the IOUs implemented Bill Discount Rate (BDR) programs that provide assistance to low-income customers on a tiered basis. The means customers with lower incomes receive a higher percentage of assistance to help offset their energy burden. In 2024, the IOUs plan to implement Arrearage Management Plans (AMP) that forgive an income qualified customer's arrearage if their account remains in good standing and they pay off a percentage of the arrearage amount. In some instances, an IOU customer could see up to 90% of their arrearage amounts forgiven.

Despite many of their long histories, utility bill assistance program participation rates continue to underperform compared to statewide programs with similar eligibility criteria, leaving many low-income households in significant energy assistance need in every community across the state. Some utility programs have seen recent increases in their program participation due to their programmatic reforms, but there remains a significant gap between their program participation rates and participation rates of individual statewide programs with similar eligibility criteria, such as the Supplemental Nutrition Assistance Program (SNAP). Approximately four times as many households participate in SNAP as participate in electric utility bill assistance programs statewide.[4]

The program challenges are more profound for rural utilities, which often have fewer resources. The share of low-income customers is often greater for these small utilities, which makes it harder to fund energy assistance costs from the rates paid by their other customers. Fully addressing the low-income energy burden through utility rates for these rural utilities could result in other households becoming energy burdened themselves.

Commerce heard from low-income households and community organizations across the state that the fragmentation of programs, broken communication processes, and lack of a highly visible programs produce a significant challenge for low-income households in accessing needed assistance. The recommended program design intentionally simplifies and rationalizes access to monthly low-income energy assistance, and addresses program access challenges raised by households, community organizations, statewide advocates, and utilities.

There is no simple answer to addressing the excessive energy burden of low-income households, which is why the recommended program design takes a holistic, multifaceted approach to delivering efficient, quality, and equitable monthly energy bill assistance to low-income households regardless of the utility or utilities that happen to serve them.

[4] 2023 Low-Income Energy Assistance Legislative Report

Introduction

Background

Department of Commerce's Low-Income Energy Assistance 2023 Legislative Report found low-income households across Washington have significant energy assistance need, and far too often do not have access to programs and funding crucial to maintaining affordable home energy bills. RCW 19.405.120 (Sec. 120) intends to address the total home energy burden of low-income households and puts the obligation to address that burden directly on electric utilities.

Commerce's 2023 report found utility programs serve only a small percentage (roughly 25%) of low-income households (116,911 households) in 2020 compared to individual statewide programs with similar eligibility standards, such as the Supplemental Nutrition Assistance program (666,269 households).

Per RCW 19.405.120(6), Commerce in 2023 evaluated additional mechanisms to assist low-income households, including mechanisms within the existing utility-by-utility approach to monthly energy bill assistance and mechanisms under an statewide and hybrid approaches. Commerce found a number of potential benefits to the state administering monthly low-income energy bill assistance, including universal access to monthly bill assistance for low-income households, uniform benefit levels for similarly situated households, and reduced administrative costs compared to administering 50+ utility programs.

The Legislature required Commerce in the Sect. 132(11) of Chapter 475, Laws 2023 (the 2023-2025 Operating Budget) to recommend a design for a statewide energy assistance program to provide universal access to low-income households and address excessive energy burden of low-income households.

Legislative mandate

Sect. 132(11) of Chapter 475, Laws of 2023, mandates the following:

A) $300,000 of the climate commitment account—state appropriation is provided solely for the department to develop recommendations on a design for a statewide energy assistance program to address the energy burden and provide access to energy assistance for low-income households. The department may contract with a third-party entity to complete the work required in this subsection.

B) The recommendations must include considerations for data collection on the energy burden and assistance need of households, universal intake coordination and data sharing across statewide programs serving low-income households, program eligibility, enrollment, multilingual services, outreach and community engagement, program administration, funding, and reporting.

C) By January 1, 2024, the department must submit a report with the recommendations to the appropriate committees of the Legislature.

The Legislature required Commerce recommend a design of a statewide program. Commerce is not required to recommend the Legislature establish a statewide program, and the agency makes no recommendations for legislative action in this report. Furthermore, Commerce is not required to recommend a funding source, and Commerce makes no recommendation on how the Legislature would fund a statewide monthly low-income energy assistance program. Commerce did evaluate the tradeoffs of different funding sources, including the Climate Commitment Account, state general fund, and a system benefits charge. The evaluation is included in Appendix M: Funding options.

How we are providing the required information

Programs to assist low-income households have a long history of being developed with little input from those most affected—potential program participants. The result often has been flawed programs that do not achieve their intent. Commerce intentionally made it a priority to elevate the expertise and lived experiences of low-income households, and put their input front-and-centered in this report. After all, **low-income energy assistance programs are first and foremost meant to address the energy assistance needs of low-income households.**

Listening sessions with low-income households

Commerce worked closely with community-based organizations to host three listening sessions with low-income households and hired the Greater Good Studio, to design and conduct three group listening sessions with low-income households. The sessions took place in Seattle, Auburn, and Tacoma. Commerce conducted 337 surveys to provide additional insights from across the state that align with the findings of the listening sessions. Commerce will also be conducting listening sessions in other parts of the state through 2024.

The listening sessions explore experiences managing household needs and expenses, and navigating different types of assistance programs. Their stories provide important knowledge and wisdom to help us understand their priorities and key insights.

Commerce and the Greater Good Studio heard many impactful stories, including those from experts, Mr. Cornethan, Bryan, and Jah'Kharri. They provide important knowledge and wisdom and help us better understand the lived experiences and expertise of low-income households, and ground this report in the lived experiences of low-income households.

Household Story: Mr. Cornethan

Mr. Cornethan previously worked in energy, where he expressed his experience with companies doing the "bare minimum" to qualify people and connect them to assistance programs.

He emphasized the harm caused by cutting power, and how it increases challenges households and communities face.

"I was in a neighborhood where all the service was cut off… No lights, no electricity. **What does a person do when it's dark?"**

— Mr. Cornethan



Household Story: Bryan

Bryan shared how hard-working people are doing all they can but sometimes it's not enough. Describing hardship to maintain eligibility, just to receive sudden reductions in benefits.

"We are fighting these fights everyday… we don't want to be on assistance for the rest of our lives but it does help."

— Bryan



He hopes listening to people's experiences continues as a "new art," because they have a lot of important insights to share.

Household Story: Jah'Kharri

Jah'Kharri spoke of the divide that exists between people of different incomes. Often programs rely on people who have little direct lived experience to make decisions for others more directly impacted.

They advocate for more transparency and accountability from programs to deliver what they promise.

"People who've been up there so long [in high tax brackets], **they don't know what it feels like to be down here**."

— Jah'Kharri



Key insights and lived expertise of households are discussed in further detail below in Recommended program design process section of the report and Appendix G: Household surveys.

Low-income household surveys

Commerce partnered with community-based organizations across the state to conduct surveys of low-income household preferences for monthly low-income energy bill assistance.

Survey locations included:

- Yakima
- Vancouver
- Spokane Valley
- Seattle
- Republic
- Kent
- Everett
- Bellevue

The survey was made available in nine languages to better reach a diverse sample of respondents.

337 individuals completed surveys. The surveys provide insights into household preferences for accessing monthly low-income energy bill assistance and supplement the findings from Commerce's listening sessions with the voices of low-income households outside King and Pierce County.

The findings of the household surveys are covered in Appendix G: Household surveys.

In-person listening sessions with community organizations

Commerce conducted seven listening sessions in community spaces across Washington and one virtual listening session with community organizations. Each listening session was two hours long. In total, 128 people from over 95 distinct organizations participated.

Roughly 50% of the meeting participants reported over 10 years of experience serving low-income households, and roughly 25% reported over 20 years of experience serving low-income households. The in-person listening sessions occurred in seven cities:

- Colville
- Kennewick
- Port Angeles
- Seattle
- Spokane
- Stevenson
- Tacoma

Each listening session had participants from nearby communities. For example, participants in the Spokane listening session included local service providers from Clarkston (107 miles away), and the listening session in Kennewick had participants from Granger (56 miles away). This inter-regional diversity provided insights beyond the locations of each listening session. Local service providers from every region of Washington participated in Commerce's virtual listening session.

Many different types of local service providers participated in the workshops, including:

- Multi-cultural service providers
- General social service providers
- Youth and family support organizations
- Community Action Agencies
- Housing authorities
- Food banks
- Faith-based organizations
- Tribal service providers

The workshops with community organizations are discussed in detail in Appendix H: Community Organization Listening Sessions Summary.

Public workshops and comment periods

Commerce held nine public workshops, which were primarily attended by utilities and statewide advocacy organizations. A public comment period followed all but the first kickoff meeting.

The first five workshops focused on co-designing principles to guide the program design. The last four workshops focused on draft report materials, including draft outlines and reports for public comment.

Consultations with other state agencies

Commerce assembled a team of programmatic staff within Commerce and across state agencies to inform the program design. The agencies involved include:

- Department of Children Youth and Family (DCYF)
- Department of Health and Social Services (DSHS)
- Department of Labor & Industries
- Employment Security Department
- Office of the Attorney General, Public Counsel
- Office of the Superintendent of Public Instruction, Migrant Education Program
- Utilities and Transportation Commission

Commerce held state agency meetings on each element of the program design and worked with staff at each agency to better understand the opportunities and limitations for how a statewide monthly low-income energy assistance program would fit into the fabric of existing statewide low-income programs.

Consultations with national experts and research into national best practices

Commerce worked extensively with Greater Good Studio to conduct listening sessions with low-income households, and the National Consumer Law Center conducted additional research into energy insecurity in Washington and the impacts of energy burden on households more broadly. The agency consulted U.S. Digital Response about the ability to leverage data from the Supplemental Nutrition Assistance Program to enroll households in bill assistance, and hired Artesia Systems to conduct additional research into streamlining enrollment into a statewide program, while ensuring household data security and privacy. In addition, Commerce conducted extensive research into national best practices in social service design, including work from Code for America and Urban Institute.

Conclusion

This report is based on the input received over the past year from hundreds of individuals from community providers, utilities, state agencies, environmental justice advocates, and households. National best practices, staff at fellow state agencies, and national experts in human-centered design, customer software solutions, and low-income energy bill assistance programs helped identify programmatic opportunities, constraints, and ways to avoid common program design pitfalls. Each of these learnings informs the recommended program design.

Recommended program design

Background

The recommended program design is designed to provide efficient, equitable, and quality monthly low-income bill assistance programs to low-income households statewide. It begins with the recognition that people should not have to think or work hard to identify and access assistance, and that Washington's residents are diverse people that deserve a system that supports equal access to resources.

Highlights

- The program would have a single name and brand to be universally recognizable to low-income households and community organizations
- The program would provide universal access to monthly low-income energy bill assistance to meet energy assistance need, which is defined as home energy expenses above 6% of household income
- The program requires only what is necessary to determine income eligibility and deliver benefits to households
- The program would build on existing and forge new relationships with households and community-based organizations through consistent, co-created communications and community outreach plans and enrollment campaigns that respect the unique needs of households and communities
- Program materials would help connect households to other social services and energy programs, and promote conservation
- The program rationalizes and simplifies accumulated layers of policy and process, and brings in new technology and human-centered design to provide increased accessibility to monthly energy bill assistance for all low-income households irrespective of the utility that happens to provide energy services to a household or the household's heating source.
- The program places minimal administrative requirements on Washington’s 50+ energy utilities

Eligibility requirements

Income eligibility criteria

A statewide monthly low-income energy bill assistance program would maintain the current definition of low-income under statute (RCW 19.405.020) and administrative rule (WAC 190-40-030), which defines low-income as incomes that do not exceed the higher of 80% of area median income (AMI) or 200% of the federal poverty level (FPL), adjusted for household size. AMI accounts for cost of living differences across the state.

Non-income eligibility requirements

A statewide monthly low-income energy bill assistance program would only require what is necessary to certify the household is low-income and deliver assistance to them. These things include:

- Household size
- Household income
- Utility name
- Customer account number
- Service address

Categorical eligibility

Households participating in other low-income assistance programs with comparable income eligibility requirements would be able to enroll in a statewide monthly low-income energy bill assistance program without additional documentation.

The process of determining whether a household can enroll in a program based on their enrollment in another program is referred to as "categorical eligibility."

Categorical eligibility can relieve documentation-related burdens for households and program administrators. Administrative staff do not have to spend time reviewing income documents and households do not have to spend time collecting and submitting them, which reduces application wait and processing times.

Categorical eligibility for a statewide monthly low-income energy bill assistance program could include but not be limited to recipients of:

- The Supplemental Nutrition Assistance Program (SNAP)
- Temporary Assistance for Needy Families
- Low-Income Home Energy Assistance Program
- Aged, Blind, or Disabled Cash Assistance Program

Income verification

A statewide low-income energy assistance program would streamline income verification, while maintaining program integrity, through categorical eligibility and self-certification.

Verifying incomes for categorically eligible households

One way a statewide low-income energy assistance program could streamline income verification is through categorical eligibility.

Households enrolled in existing statewide low-income programs noted above could opt to provide their Social Security Number or DSHS Client ID number for verification purposes. With appropriate data sharing agreements in place, and as allowable by federal and state laws, the state administrator could query household provided information and verify the household is low-income.

Self-certification

The Legislature expressly provided investor-owned utilities the option to use categorical eligibility or self-attestation with limited documentation, also known as self-certification. The Legislature should provide a statewide low-income energy assistance program the same option.

Improving program integrity through categorical eligibility and self-certification

The integrity of self-certification could be enhanced by removing households who have already verified their incomes with the state to be removed from the state verification pool. Their incomes have already been verified by the state, and it would be a waste of resources to verify known low-income households, rather than focus on households that have not verified their incomes with the state.

Monthly bill discount mechanism

The recommended monthly bill discount mechanism would be tiered based on income, and the discount amount is tied to an approximate amount of assistance needed to meet energy assistance need for

households in each income tier. Program participants with less income would individually receive a greater level of assistance than individual households with more income.

A majority of utilities and statewide low-income advocacy organizations supported a tiered percentage approach, because it was the most equitable option that is administratively straightforward. Community organizations and low-income households also overwhelmingly favored a tiered bill discount.[5,6]

A tiered discount design entails establishing a target burden level and calculating the percentage discount required for a household at the income tier midpoint to achieve the target burden level. Average usage levels are assumed in the tiered discount approach. Ideally, tier-specific benefit levels should be adjusted annually to ensure that the value of the percentage discounts does not deteriorate as utility rates increase.

A program administrator would need to determine benefit tiers and amounts during program implementation based on a sampling of utility and household data statewide. Avista and Puget Sound Energy provide examples of how to establish income tiers and discount levels.

Ensuring no significant decrease in assistance for households receiving benefits today

Under a statewide program, households already enrolled in a bill assistance program should not receive less of a benefit than they currently do.

A statewide program administrator could ensure that households receives no less than the most generous benefit offered to households in each income tier today, or continue to provide households the discount they were receiving previously.

Addressing benefits cliffs

It is important for a statewide low-income energy assistance program to avoid households experiencing a sudden loss of benefits when they experience increases in earnings (a benefits cliff), which may leave them worse off than they would be with a more gradual transition off social services. [7]

A tiered bill discount helps address benefit cliffs by decreasing bill assistance levels gradually as household incomes rise. Furthermore, income eligibility criteria set at the greater of 80% AMI or 200% FPL, adjusted for household size, is in most cases higher than federal assistance programs, which means households would not lose access to crucial energy bill assistance at the same time they lose access to other social services. If these measures prove insufficient, a program could take additional steps to ensure that households don't suddenly lose benefits they had been counting on to help stabilize their household finances.

Addressing Utility Payments to Landlords

One challenge bill assistance programs often face is providing a monthly discount to renters that do not have accounts with their utility, but rather pay their utility bills through their landlords. One way to address this gap would be for a statewide program to provide a monthly upfront rebate to the household. The upfront rebate

[5] See Appendix G: Household surveys
[6] See Appendix H: Community organization listening sessions
[7] See Appendix O: Benefit cliffs

could be sized based on household income to target energy assistance need. Additional documentation may be needed to establish the household is paying their utility bills through their landlord.

Application requirements

The application of a statewide monthly low-income energy assistance program would only require what is necessary to enroll households in a program.

Application requirements might include:

- Household size
- Household income
- Utility name
- Customer account number
- Service address

Optional enrollment information

There is likely information to streamline enrollment through crosschecking their information in a state system; however, this information is unnecessary to enroll households in the program. The application would make clear that providing this type of information may be beneficial, but is not required to enroll.

Examples of information that would improve a household's experience with the program include:

- Phone number (optional)
- Email address (optional)
- Social Security Number (optional)
- DSHS Client ID number (optional)

Phone numbers and emails will allow the state to contact households directly via phone or email. Some households may have neither, and the program does not required they have either. Social security numbers and DSHS Client ID numbers will allow the state to verify household incomes if the household is enrolled in another state program with similar income eligibility requirements. Benefits of providing this information to the administrator will be clearly communicated in line with best practices in social service program delivery.

Another set of optional prompts would include information to improve program performance. **Example prompts in this bucket include:**

- Language (optional)
- Ethnicity (optional)
- Race (optional)
- Education (optional)
- Disability status (optional)
- Senior (60+) (optional)

Application design

A statewide monthly low-income energy assistance program would adhere to user-friendly, human-centered design principles, such as those recommended by Code for America, a civic tech non-profit organization that partners with governments to help deliver software services, particularly for low-income and marginalized

communities. The following user experience design recommendations were informed by Code for America based off of best practices for other, similar programs.

Human-centered application design[8] **recommendations include**:

- Use an application flow that sets expectations for the process and highlights support by phone, while preserving language toggle translation options
- Use familiar words, be concise, and use headlines to make it clear what each page or section is about
- Group similar questions together
- Adjust the questions you ask based on the answers you've already received (gating questions)
- Remove unnecessary questions and pages
- Minimize typing and maximize use of tapping functions
- Limit switching between tapping and typing as much as possible
- Include a progress bar that tracks where an applicant is in the application
- Use large tap targets, wide buttons, and large dropdown inputs to make it easy to share information
- Keep a conversational tone that feels warm and inviting, rather than opaque or judgmental

The application and any supporting materials will be translated into the most spoken language by Washington residents with limited English proficiency. These languages include, but not be limited to:

- Spanish
- Russian
- Chinese
- Vietnamese
- Ukrainian

A statewide program would begin with these recommendations and then co-design an application with the people most likely to use it — the low-income households and community organizations that help households enroll in programs.

Enrollment

Low-income households and service organizations emphasized the importance of having multiple enrollment options to ensure a program is accessible. While an online application may be increase access for many clients, households with limited or no internet access or who prefer in-person or phone appointments would be able to receive services in their communities or over the phone.

Online enrollment

A statewide monthly low-income energy assistance program would help households enroll online easily.

A human-centered, mobile-friendly webpage is an important aspect of program accessibility. As noted by Code for America: [9]

> "A benefits website should have a welcoming and accessible front door, which includes the homepage, navigation, and any pages that lead to an application. Intimidating pages with complex navigation and

[8] The Benefits Enrollment Field Guide — Code for America
[9] The Benefits Enrollment Field Guide — Code for America

required account registrations can discourage visitors from applying for benefits. This can mean the difference between securing benefits or becoming another household that falls through the participation gap."

A statewide monthly low-income energy assistance webpage would include the following best practices:[10]

- A guide bar to identify official state websites
- A clear button to begin applications
- Homepage that provides an explanation of the application process
- The ability to navigate by means other than keyboards
- Content that works with screen readers, including using alternate text on images
- Video captions
- Apps that work on virtually any contemporary web browser
- Clearly identified button toggles to switch between different language translations
- A font size adjuster
- Guidance to find in-person enrollment options, if desired
- The ability for households to use GPS to connect users to the nearest community organization
- Information and contacts for low-income energy efficiency, weatherization, and solar programs
- Crucial information is not buried under tabs or hyperlinks

As with the development of a program application, a statewide program would begin with these recommendations and co-design webpages with low-income households and community organizations that help households enroll in programs.

Additional support features available on online portal

As observed by Code for America, "a good program experience isn't limited to the application. It's also about being able to easily find answers to questions, ask an expert about a case with minimal wait time, make and reschedule interview appointments, see the status of an application, and renew benefits online."[11]

The online portal for a statewide program would allow applicants to:[12]

- Check their application or renewal status
- Read notices
- Upload documents
- Update their contact information
- View their benefits
- Access live chat in multiple languages
- Access digital client communication
- Find assistance at a nearby community organization
- Upload required forms by taking pictures of them
- Use GPS to connect users to the nearest community organization
- Access information and contacts for low-income energy efficiency, weatherization, and solar programs

[10] Ibid
[11] Ibid
[12] The Benefits Enrollment Field Guide — Code for America

In-person enrollment

It is important for households to be able to enroll in a statewide monthly low-income energy assistance program in person at a community organization of their choice.

A highly visible program with uniform eligibility, streamlined application requirements, and an enrollment process open to all low-income households would allow any service provider the ability to enroll households in a program.

Partner registration

Low-income service providers would be able to sign-up their organization available to assist households with getting monthly low-income energy bill assistance, and identify other services, such as language services, available at the organization.

Lead partners

While a statewide low-income energy assistance program cannot address funding shortages for community service providers statewide, the Legislature could provide funds for the program administrator to support in-person enrollment and more tailored outreach and enrollment campaigns. These partners could include organizations that serve historically marginalized communities and administrators of other energy services, such as the Low-Income Home Energy Assistance Program and energy efficiency and weatherization programs.

Phone enrollment

A statewide low-income energy assistance program would provide a call center for households seeking to enroll over phone. Phone services would be provided in the preferred language of the household either directly through the state administrator or indirectly through contracted service providers.

Data sharing and auto-enrollment

Commerce has identified data sharing opportunities with other means-tested statewide programs, such as the Working Families Tax Credit, the Supplemental Nutrition Assistance Program (SNAP), the Special Supplemental Nutrition Program for Women, Infants, and Children (WIC), the Low Income Home Energy Assistance Program (LIHEAP), the Low Income Household Water Assistance Program (LIHWAP) and Weatherization. These programs reach relatively few low-income households to those that would be eligible under a statewide monthly low-income energy assistance program.

Commerce evaluated opportunities with DSHS to identify whether households enrolled in Supplemental Nutrition Assistance Program could be auto-enrolled in a statewide program. DSHS found that federal statutory barriers prevent data sharing needed for auto-enrollment of households participating in SNAP. However, DSHS is seeking a legal waiver from the federal government to share SNAP data.

Integrated enrollment and eligibility

The Legislature required Commerce to evaluate options for universal intake of household information to facilitate co-enrollment in a statewide low-income program, at the time of enrollment in other state aid programs. This potential redundancy led Commerce to evaluate the potential of incorporating a statewide

monthly low-income energy assistance program in the Integrated Eligibility and Enrollment Modernization Program.[13]

The Integrated Eligibility and Enrollment (IE&E) Modernization Program seeks to transform how people in Washington access health and human services. This multi-year initiative aims to develop modern, integrated eligibility that better supports households and program staff. The IE&E program is still being built. Discussions about whether and how a statewide monthly low-income energy assistance program could be incorporated into IE&E are premature until a statewide monthly low-income energy assistance program is established by the Legislature.[14]

In any case, a statewide monthly low-income energy assistance program would have its own streamlined individual application process. The application would be shorter than the IE&E application, because IE&E requires more information to meet the requirements of other federal and state programs.

Outreach and enrollment campaigns

Outreach and enrollment campaigns under a statewide program would provide consistent, accessible, and inclusive information. The program would use multiple types of media and communicate information in plain speak. Communication items would be available in multiple languages.

A statewide program administrator would develop outreach plans that account for the differences in characteristics and values between communities, and tailor messages to be responsive to them. The plans would be developed with households and service providers across the state.

Outreach and enrollment campaign materials would be designed using input from local service providers and households, and would be informed by national best practices in human-centered design. These best practices include strategies for avoiding and proactively addressing poverty stigmas.

Making it easier for households and community organizations

A singular program with one set of eligibility criteria, an easy enrollment processes, and consistent messaging would allow community partners to incorporate the program into their existing messaging and outreach and tailor the program messaging to their communities with consistent facts about a singular program.

Promoting conservation while providing bill assistance

Program materials and communications would raise awareness about the benefits of power conservation, and include information about energy efficiency and weatherization opportunities.

Referring households to wrap-around services

A statewide monthly low-income energy assistance program would help households connect to other resources and programs online and in their communities through links to programs and resources on the webpage and enrollment portal.

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[13] Integrated Eligibility and Enrollment Modernization Roadmap Report (wahealthplanfinder.org)
[14] Integrated Eligibility and Enrollment Modernization Program (IE&E) | Healthier Washington Collaboration Portal (waportal.org)

Existing state community engagement and outreach opportunities

A statewide monthly low-income energy assistance program could capitalize on existing opportunities to reach low-income households through programs already administered by the state. Below is a summary of those opportunities.

Washington State Department of Commerce (Commerce)

Commerce's mission is to strengthen Washington communities. The agency conducts outreach and community engagement through a statewide outreach and community engagement team, which has staff in communities across Washington.[15]

The agency is one of seven agencies subject to the Healthy Environment for All Act, which requires the agency adopt an environmentally just community engagement plan and a tribal consultation framework with methods and tools for measuring outreach and community engagement outcomes. These outreach methods and tools will inform energy assistance program outreach and enrollment campaigns.

Commerce's Communications team has extensive experience conducting outreach and enrollment campaigns through billboard and internet advertisement, e-mailing campaigns, and other forms of mass communication, which could be leveraged to raise awareness about a statewide program open to all low-income households.

In addition to Commerce's dedicated Communications and Outreach teams, Commerce has several policy offices and programs dedicated to helping communities and households furthest from equity. These programs and offices include:

- **Outreach for Historically Underserved Communities Grants Program:** Funds community organizations that serve historically disadvantaged populations to conduct outreach and assist community members in applying for state and federal assistance programs
- **Weatherization Plus Health Program:** An Energy Division program that contracts with local service providers in all 39 counties to provide weatherization assistance to eligible households
- **Housing Division:** A division that works with local housing agencies, non-profit community organizations and community action agencies on critical housing issues
- **Office of Tribal Relations:** A standalone unit that coordinates formal government-to-government consultations between Commerce and tribes within Washington

Washington State Department of Social and Health Services (DSHS)

DSHS is the principal social service agency in Washington. DSHS has social service offices across Washington, and contacts low-income households through in-person interactions at these offices, as well as online and over the phone.

DSHS contracts with two organizations to conduct outreach and community engagement for the Supplemental Nutrition Assistance Program (SNAP): People for People and WithinReach. These contractors coordinate several different services related to food assistance, including subcontracting with over 38 community organizations across Washington. These organizations primarily interface with SNAP clients by providing

[15] See Appendix R: Department of Commerce outreach and community engagement

application assistance through Washington Connection, an online portal that helps Washington residents and businesses connect to services.[16]

DSHS and its partner organizations would be able to distribute outreach materials, such as pamphlets, for a statewide low-income energy assistance program. More involved outreach and enrollment activities would require a separate contract and funding.

Washington State Department of Children, Youth, and Families (DCYF)

DCYF is the lead agency for state-funded services that support children and families to build resilience and health, and to improve educational outcomes. It accomplishes its mission by partnering with state and local agencies, tribes, and other organizations in communities across the state of Washington. [17]

DCYF could share information about a statewide monthly low-income energy bill assistance program through social media and other online channels, raising awareness of the program's existence, as well as how households could enroll or get more information.

Office of Superintendent of Public Instruction's (OSPI) Migrant Education Program (MEP)

OSPI's MEP is a federally funded program created in 1965 that provides a variety of supplemental services for migratory children and their families to ensure migratory children have the same opportunities to achieve educational success as their peers. These supplemental services include educational programs, supports, and services, as well assistance in connecting with available health and other social services.[18]

Both MEP's recruitment teams and local educational agency program staff could help spread information about a statewide low-income energy assistance program. With the appropriate information about eligibility criteria and the enrollment process, MEP staff could inform migrant students and families about the program and direct interested households to the program application.

Outreach through community partners

Outreach and enrollment campaigns through community partners

Uniform programming and consistent communications would enhance knowledge about program services at community service organizations, and permit service providers to easily share information about low-income monthly energy bill assistance.

Streamlined application and enrollment procedures help service providers enroll households in the program in a timely fashion, furthering their mission to serve low-income households in their communities, and boosting their ability to compete for state and federal funding opportunities.

Extensive outreach and enrollment campaigns through community partners would likely require additional funding.

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[16] See Appendix S: DSHS outreach and community engagement for the Supplemental Nutrition Assistance Program
[17] See Appendix T: Opportunities for partnership and lessons learned from the Department of Children, Youth, and Families outreach
[18] See Appendix U: Office of Superintendent of Public Instruction outreach and community engagement

Outreach through utilities

Utilities could help advertise a statewide energy assistance program, and post general information about the program provided by the state on the utility's webpage per guidelines established by the state administrator.

Targeted outreach to most impacted populations

A state administrator could strengthen existing relationships and build new ones with organizations in energy burdened communities. The state has relationships with local service providers across Washington, and the Legislature has continued to make investments in improving those relationships through grant programs to increase connections between state and federal social services, and local communities.

Program evaluations and assessments of energy burden in communities using real-world data would guide a statewide program's outreach efforts to target households in greatest need.

There would be clear communications that program participation would not be considered for the purposes of making public charge determinations, and would not impact the ability for participants to change their immigration status.[19]

Language services

A statewide energy assistance program would translate and produce language materials reviewed and approved by first-language speakers. These materials include outreach materials, such as flyers and social media advertisements, as well as application materials and enrollment services. Program webpages would be translated into multiple languages.

The statewide program administrator would provide interpretation, translation, and American Sign Language services for Washington households upon request through phone, email, video call, or e-mail. In addition, program webpages would include self-identified community organizations and the language services provided by those organizations. Commerce would intentionally work with these organizations to familiarize them with the program and its outreach and enrollment materials.

Program administration

Embedded program evaluations

Continuous program evaluation integral to ensure the statewide low-income energy assistance program is effective in reaching low-income households.

Table A: Illustrative Evaluation Metrics provides a framework adapted from Code for America that captures various types of program evaluation data, such as benchmarking and performance measurement.[20]

A statewide program could leverage data from other statewide programs to identify potential points for intervention to improve outcomes for households in communities. The state would leverage geo-spatial tools that utilize multiple energy burden and program data sets to measure the effectiveness of the program, as well as strategies for generating short- and long-term assessments of the impact of programs on participants.

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[19] See Appendix U: Office of Superintendent of Public Instruction outreach and community engagement
[20] How should we measure safety net delivery? — Code for America

Regular check-ins with local service providers and surveys and listening sessions with households would provide additional data and insights. Together, this data would help the administrator make decisions about the best way to tailor program implementation to improve performance on an ongoing basis.

Table A: Illustrative Evaluation Metrics

Indicator	Definition	Metrics	Examples of measurements
Equitable access	Accessibility means removing barriers so all people can easily access services across languages, racial and ethnic identities, ages, and levels of ability. It also means a dignified, respectful, and welcoming experience that makes it as easy as possible to access benefits. An accessible program has many open doors that successfully and equitably invite in all eligible people.	• Online accessibility • Mobile accessibility • Call center accessibility • In-person accessibility • Application burden • Customer satisfaction	• Average number of minutes to complete an application and renewal, via desktop and mobile • Average wait times by language at local offices • Average call wait times and call abandonment rate
Effective delivery	Safety net programs should operate smoothly to serve everyone eligible. Programs need to get things right the first time — like determining someone's eligibility and calculating the correct benefit amount — so the experience can be fast, easy, and positive for clients.	• Application outcomes • Procedural denials • Timeliness • Notifications • Verifications • Renewals • Churn	• Percent of applicants denied for reasons beyond financial eligibility • Average number of days from application submission date to determination • Percent of households who opted in for e-mail notifications • Percent of renewal cases denied for not recertifying • Percent of new applicants that received benefits per month
Integrity	Benefits should be delivered correctly according to policy, and people should benefit to the fullest extent from available policy flexibilities.	• Participation rate • Accuracy • Appeals	• Number of program participants compared with the total number of estimated eligible people • Number of program participants compared with the total number of SNAP participants • Accuracy of determinations • Percent of appeals upheld • Percent of appeals reversed

Advisory group

Low-income service providers and households said that they often do not have a say in the design and implementation of programs meant to serve them. A statewide program would have a formal advisory group comprised of a diverse set of service providers, households, utilities, and statewide low-income advocates,

including service providers and households from historically marginalized communities. The advisory group would assist the state administrator by providing input on key decisions launching the program and supporting ongoing program implementation and evaluation.

Funding considerations

The Legislature requires Commerce to consider funding in its program design. It did not ask Commerce to make a recommendation on a funding source, and Commerce does not make one in this report.

Potential funding sources

Commerce considered three different funding sources:

- The state general fund
- Climate Commitment Act
- A system benefits charge

Commerce did not identify significant differences in these potential funding sources that would affect program administration, with exception of potential fluctuations in Climate Commitment Act revenues.[21] There are benefits and drawbacks to using different funding sources that do not directly impact the administration of a statewide monthly low-income energy assistance program. Those considerations are included in Appendix M: Funding options.

Forecasting caseloads

Funding decisions for a statewide low-income monthly energy bill assistance program would be informed by forecasts of caseloads through the Washington Caseload Forecast Council (Council).

The Council is an independent state agency governed by a bi-partisan council. The Council is charged with forecasting the entitlement and other caseloads for Washington. The Council meets several times a year to adopt official forecasts used as the basis of the governor's budget and by the Legislature developing the omnibus biennial appropriations act.[22]

The Council forecasts cover programs and services broadly grouped under children's services, public assistance, education, long term care, medical assistance, education, and corrections.

In the public assistance category, the Council provides caseload forecasts for the following programs:

- Temporary Assistance for Needy Families
- Aged, Blind and Disabled Assistance Grant
- Working Connections Child Care
- Early Achievers Tiered Reimbursement Providers
- Working Families' Tax Credit

[21] There is uncertainty about future revenues from the Climate Commitment Act, which may make it insufficient as a standalone funding source in the future. Voters may decide to repeal the Climate Commitment Act in the 2024 election, which would eliminate the Climate Commitment Act as a funding source.
[22] See Appendix N: Caseload Forecast Council

The Council's caseload forecasts would provide an open and transparent process for regular, consensus-based estimates of future program demand, which would inform budget decisions.

Limited requirements on utilities

One of the primary goals of a statewide program is to reduce the inefficiencies of administering more than 120 programs across 50+ utilities per Sec. 120, while making access to monthly low-income bill assistance available to low-income households statewide. **Electric utilities would be subject to significantly fewer responsibilities under a statewide program.**

Table B: Illustrative summary of utility obligations under a statewide approach

What utilities would do	What utilities would not do
• Apply a discount percentage to household upon notice from the state administrator • Bill the state administrator for the discounted amount • Remove the discount for an address upon change in customer service or notice from the state administrator that the household is no longer eligible • Post general information about the program, provided by the state, on the utility's webpage • Advertise the program at least twice a year using state-provided materials • Notify customers who fall behind on their payments that they may be eligible for assistance	• Design and administer their own monthly low-income energy bill assistance programs • Conduct programmatic assessments and evaluations • Verify household incomes • Develop program materials • Conduct their own independent outreach and comprehensive enrollment campaigns, unless desired • Be individually responsible for the energy burdens for home heat and power sources beyond the utility's book of business • Be responsible for program outcomes

Being careful not to overdesign a statewide program

Commerce intentionally kept many of its recommended design elements of a statewide energy assistance program from straying into granular details. This recognizes the importance of not overdesigning a program, which could constrain the program's ability to adapt to meet household or community needs.

Allowing some flexibility in program design and implementation avoids several potential pitfalls of overly rigid enacting legislation. **The risks of an overly prescriptive statutory approach to a statewide monthly low-income energy assistance program include:**

- Bureaucratic hurdles that slow the development and implementation of a statewide low-income energy assistance program and increase administrative costs.
- Difficulties adapting the program to rapid changes in technology, demographics, and environmental conditions necessitate agile responses from program developers and implementers.
- Undermine community engagement and ownership by limiting opportunities for local households, community organizations, and utilities to participate in the design and implementation of a statewide monthly bill assistance program.

Alternative frameworks within a statewide program

Voluntary opt out

An alternative design would be to allow utilities to opt out of a statewide low-income energy assistance program. Any discussion of an opt-out provision should consider the impact on that utility's low-income customers. An opt-out provision could leave households with an energy assistance program that is less visible, less accessible, and less effective in meeting energy assistance need. It could even result in those households receiving no monthly energy bill assistance at all. An opt-out mechanism would not ensure universal access, uniform benefits, or human-centered, user-friendly program options for low-income households.

An alternative statewide approach to universal access, uniform benefits, and human-centered program design

An alternative approach that provides universal access, uniform benefits, and human-centered program design would be for the Legislature to adopt a statewide program for low-income households served by small- and medium-sized utilities. It would address the funding dilemmas faced by these utilities and provide universal access to low-income monthly energy assistance programs for households.

Large utilities would need to meet other criteria to ensure consistent services to households. These requirements include:

- Meeting existing statutory income eligibility requirements
- Providing an income tiered bill discount
- Tying benefits in each tier to an approximation of benefits needed to meet energy assistance need
- Ensuring benefit level under each tier complies with a standard methodology established by rule
- Completing a biennial low-income energy assistance needs assessment
- Offering streamlined eligibility, including categorical eligibility and self-attestation
- Conducting significant outreach and submit annual reports with results of outreach efforts
- Coordinating programs with community based organizations, including those specifically serving historically marginalized communities
- Conducting reasonable and good faith efforts to attain approval for program design, outreach, and enrollment campaign plans from low-income advisory groups, according to guidelines established by Commerce for consumer-owned utilities or Utilities and Transportation Commission for investor-owned utilities
- Reporting program participation rates along with information currently submitted under Sec. 120 on a biennial basis
- For large utilities: Matching program participation rates of SNAP; if not, programs would be required by the Legislature to be phased out and households served by these utilities would be covered by the statewide monthly low-income energy assistance program

This alternative statewide approach would fragment services between large, medium, and small utilities; however, fragmentation across utility programs would decrease significantly and ensure universal access to monthly low-income energy bill assistance and uniform benefit levels for similarly situated households.

Conclusion

The recommended program design begins with the assumptions that identifying and accessing assistance should not be complicated, and Washington's diverse people deserve a system that supports equal access to resources. These assumptions and the recommended design follow input over the past year from hundreds of

individuals from community providers, utilities, state agencies, environmental justice advocates, and households, and careful consideration of alternative approaches outlined in Alternatives under a utility-by-utility approach and summarized in Table P: Policy layering and supplementary funding approaches. The remaining sections of this report discuss the process and insights that inform the recommended program design.

Recommended program design process

Background

Commerce designed its recommended program design over the course of a year with the assistance of low-income households, community organizations, statewide advocacy organizations, and utilities. This section of the report summarizes these activities and findings.

Listening sessions and surveys of low-income households

Services intended for marginalized communities are often developed with little input by those most affected: Program participants. Commerce worked closely with community-based organizations and hired Greater Good Studio, a third party consultant with human-centered design expertise, to design and conduct three group listening sessions with low-income households to further the agency's understanding of low-income household needs.

The listening sessions explored experiences managing household needs and expenses, and navigating different types of assistance programs. The stories shared provide important knowledge and wisdom to help us understand household priorities and key insights. An in-depth analysis of the listening sessions is provided in the Recommended program design process.

Five individuals from different households participated in each session. The listening sessions took place in Seattle, Auburn and Tacoma. To provide a broader statewide perspective, Commerce conducted surveys of low-income households with community organizations across the state to get a sense of their experiences accessing energy assistance programs, program design preferences, and recommendations on low-income energy assistance program designs. The methodology for these listening sessions is covered in Appendix F: Centering lived experiences.

The agency is also conducting listening sessions in rural parts of Washington through the fall of 2024. The workshops are not specific to a statewide program design. Results of those listening sessions will be made available to the Legislature before Jan. 1, 2025.

Listening sessions with community organizations

Commerce held listening sessions with social service providers and community organizations across the state. In total, 128 people from almost 100 distinct organizations participated. Roughly half of the session participants reported over 10 years of experience serving low-income households, and roughly 25% reported over 20 years of experience serving low-income households. Detailed descriptions of the sessions and their outcomes are discussed extensively in Appendix H: Community organization listening sessions summary.

Workshops with utilities and statewide low-income advocates

Commerce held nine public workshops, which were attended by utilities and statewide advocacy organizations. A public comment period followed all but the first kickoff meeting.

The first five workshops focused on co-designing principles to guide the program design. The last four workshops focused on draft report materials, including draft outlines and reports for public comment.

Highlights

- Fragmentation, inequitable distribution and access to resources, inconsistent communications, and burdensome enrollment processes affect the ability of low-income households to know about and enroll in programs, and the ability of community based organizations to help enroll low-income households in programs.
- Low-income households take initiative to get their needs met, but broken program communications slow down the process.
- Power often sits with those who administer programs, not those they are meant to serve, with program administrators determining who gains access to resources and how they do so, and providing few opportunities for households to be empowered in setting terms.
- A statewide program should have ongoing relationships with program participants and community-based organizations.
- Assistance programs need to be designed with a gradual off ramp from assistance, rather than sudden program exit for households.

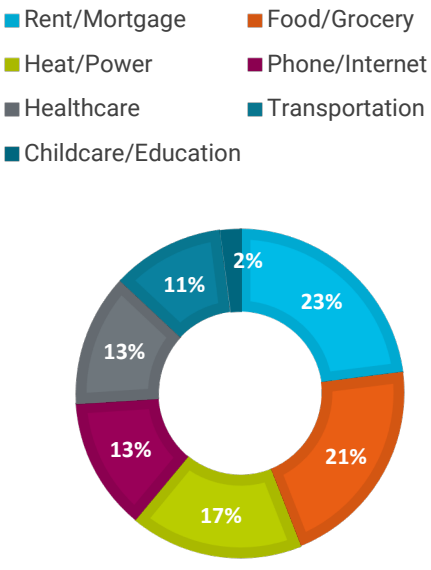
Household listening session insights

The listening sessions explored experiences managing household needs and expenses, and navigating different types of assistance programs. Their stories provide important knowledge and wisdom to help us understand household priorities and key insights.

Household priorities

Facing difficult daily choices, households often decide which needs to prioritize and which must wait. Housing and food were ranked #1 and #2, because they meet immediate basic needs. But heat and power were named as a critical concern relating to almost every category.

Figure 1: Household priorities by level of importance averaged across all listening sessions



Source: Greater Good Studio

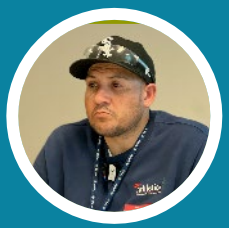
"I think [my ranking] was between heat and the power and the food. I chose the food but I know I gotta have the heat and power to make the food."

— Manuel (pseudonym used)



"I put [energy] behind a couple of the main ones... but then you're not gonna have any of that if you don't have power."

— Bryan



Household insights into programs

Insights from household experiences from interacting with low-income programs can support developing design principles that amplify positive program effects and mitigate negative ones.

People take initiative to get their needs met, but broken program communications slow down the process

The fragmented programmatic landscape causes undue burden of program participants seeking out information about assistance and their benefit status.

"When do we have funds? When do they get the grant? We don't know. **We don't know how to go at the right time to figure it out**."

— Annie



"It all comes back to being resourceful to yourself. **If you call enough people, if you go out, if you put the word out, and know something's gonna come back to you… you'll be able to get that break"**

— Jah'Kharri



When resources are available, they don't always get to where they are meant to go

It isn't enough to merely have funds to distribute or services to provide. Programs need to be set up to provide equitable and culturally sensitive support.

"We're being taken advantage of by [programs] the state has given money to. We've seen [them] saying, Okay, give it to 1, 2, 3, 4, 5 [skip 6-9]… Come on, man, we all coming in for the same thing"

— Bennie



"How do you go in one door, know the person that went into the same door…. they did [get assistance] and you didn't. And the only difference between you is skin color, or nationality. **That's not right."**

— Mr. Cornethan



Power often sits with those who administer programs, not those they are meant to serve

Programs determine who gains access to resources and how they do so, with few opportunities for households to be empowered in setting terms.

"When I see those [program requirement] papers it makes me sick. But I need to eat. **I need to do what *they* want to get my EBT."**

— Catherine

"**Meet us where we at** instead of trying to push me into doing what you want me to do."

— Jah'Kharri



You can't build effective programs that support people you don't know

Without direct information or ongoing relationship with program participants, it is difficult to determine what assistance would be or is most impactful.

"I got an advocate and she helped me out with everything… helped me with my application, all that stuff. Everything went through."

— Kandee

"Sometimes, [you] don't want anything, just need somebody to talk to. They don't have to give you no money, **just be there."**

— Annie



Assistance programs tend to penalize instead of support people experiencing transitions

Assistance programs are often not designed for transition support, which can trap people in a cycle of needing assistance instead of helping advance their lives.

I started in a transitional home. I've been there like two and a half years. And it's time to kind of graduate, get a little independence, move forward. **In doing that, I'll be taking on a lot of these other bills**…When I was talking to my housing unit, I was kind of trying to figure out the basic expenses of things..."

— Lee



Program design insights from low-income household discussions

From the value-based insights that reference the general experiences of households accessing and navigating assistance programs, Greater Good Studio developed feature-based insights to look at service offerings a statewide program may incorporate. They reflect highlights and challenges households experience across three phases:

Table C: Phases of program experiences

Awareness	Enrollment	Experience
How people find out about and first get connected to programs.	How people find out they are eligible and apply to programs.	How people navigate the program and receive services.

Source: Greater Good

Feature-based insights from listening sessions

A wide range of communication methods meets people where they are, increases visibility, and expands program reach.

Features might include:

Awareness
Print and digital media; going to the office/site

Enrollment
Interpersonal methods: Word of mouth, direct referrals

Experience
Case manager, navigator

Source: Greater Good Studio

"Well, one thing [that helped] was the bill credit. I applied for it. **I heard about it through my mail."**

— Tammy

"Being able to **talk to somebody that was able to stay on track, and give me a nice email**... and get things back to them. Or to answer the questions. How do I learn about the program with my friends and family. And also word of mouth."



— Bryan

Embrace accessibility and transparency to shift power imbalances between households and the program.

Features might include:

Enrollment
Ability to self-check enrollment status and track progress over time

Experience
Regular check-ins with program staff to address needs and share feedback

Source: Greater Good Studio

"[There are] people that are illiterate... when you in that, you don't want nobody to know. You're ashamed. **You can't read, you can't understand the small print.**"

— Annie



"The **staff was very on hand step by step**, explain[ing] and help with the computer and paperwork, bus passes, housing network..."

— Kwania



Invest in meaningful relationships to understand needs and offer appropriate assistance in real time.

Features might include:

Awareness
Work with community organizations as trusted liaisons for referrals

Experience
Provide a program navigator or advocate that is dedicated over time

Source: Greater Good Studio

"**My job developer continue[s] to help me**... with gas cards... getting me steel toed boots for work. They help you get back on your feet and it's really a blessing."

— Manuel (pseudonym used)



"People are trying to count my utility help as being monthly income... **that goes straight to my bills, I don't see any of it.**"

— Lula *(pseudonym used)*



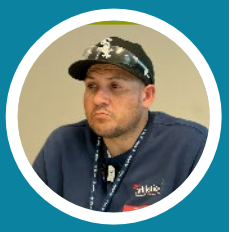
Close assistance gaps by reducing unreasonable criteria and administrative barriers

Features might include:

Enrollment
Tap into existing social service networks for coordinated eligibility check

Experience
Align income requirements with area living wage standards rather than federal poverty line

Source: Greater Good Studio



"You have to do a **lot of work and efforts [to receive assistance]** to not even make enough to pay bills or keep a roof over your head."

— Bryan

Be clear about what is being offered and follow through on providing what was promised.

Features might include:

Enrollment
Sharing relevant personal information only; accessible, responsive an easy enrollment

Experience
Follow through, customer service oriented adequate provision of assistance

Source: Greater Good Studio

"But **I've never got anything from them** nor didn't even get a response from my application and that's for energy... I just left it alone."

— Tammy

Provide flexible and sustained assistance that responds to emergent needs and eliminates sudden benefit decreases.

Features might include:

Experience
Budget for low-barrier discretionary funds that can be applied on an as-needed or emergency basis

Different assistance pathways that provide gradual rather than sudden program exit

Source: Greater Good Studio

"When you're brought to tears, about your need, all you trying to accomplish is what they allowed you to do for a month. May it be paying for your electrical bill, or may you need a new roof or you're buying enough oil. Once you get that assistance they're saying 'thank you.' **But what am I gonna do next month?"**



— Mr. Cornethan

Reflecting household insights in the recommended program design

The recommended program design incorporates the potential program design features from listening sessions with low-income households. Below is a summary table that highlights how the recommended program responds to the identified household insights.

Table D: Summary of ways a recommended program design provides a wide range of communication methods that meet people where they are, increases visibility, and expands program reach

Phase	Potential program design feature	Illustrative summary of recommended program design
Awareness	Print and digital media; going to the office or site	State administrator publishes and disseminates print and digital media in multiple languages; program webpage allows organizations to register their willingness to serve low-income households in-person, so low-income households can find them
Enrollment	Interpersonal methods; word of mouth, direct referrals	Statewide program is highly visible with a singular program name and brand, allowing households and service providers to easily recognize the program and make referrals
Experience	Case manager, navigator	Statewide program and program staff help households manage benefits directly through an online portal or over through call center; statewide program administrator works with community organizations that provide wrap-around services to help

Phase	Potential program design feature	Illustrative summary of recommended program design
		households get connected to other programs

Table E: Summary of how a program would embrace accessibility and transparency to shift power imbalances between households and the program

Phase	Potential program design feature	Recommended program design
Enrollment	Ability to self-check enrollment status and track progress over time	Households can self-check their enrollment status and track progress through the program's online portal or over the phone.
Experience	Regular check-ins with program staff to address needs and share feedback	The statewide program administrator would provide regular check-ins with households via online messages or email correspondence, including customer service surveys. Program correspondence would include information for in-person appointments

Table F: Summary of how a program would invest in meaningful relationships to understand needs and offer appropriate assistance in real time

Phase	Potential program design feature	Recommended program design
Awareness	Work with community organizations as trusted liaisons for referrals	The statewide program administrator would strengthen existing and forge new relationships with community organizations across the state family; provide regular regional check-ins; and could conduct coordinated enrollment campaigns with community organizations
Experience	Provide a program navigator or advocate that is dedicated over time	The statewide program administrator would have dedicated staff to help households navigate program requirements

Table G: Summary of how a program would close assistance gaps by reducing unreasonable criteria and administrative barriers

Close assistance gaps by reducing unreasonable criteria and administrative barriers		
Phase	Potential program design feature	Recommended program design
Enrollment	Tap into existing social service networks for coordinated eligibility check	The statewide program would plug into existing social service networks and provide categorical eligibility for households to verify their household incomes
Experience	Align income requirements with area living wage standards rather than federal poverty line	The statewide program adopts area median income standards where they are higher than the federal poverty level

Table H: Summary of how a program would be clear about what the program would offer and follow through on providing what was promised

Phase	Potential program design feature	Recommended program design
Enrollment	Sharing relevant personal information only; accessible, responsive, and easy enrollment	The statewide program requires only the information needed to determine income eligibility and deliver benefits to a household's utility account; program is accessible online, in-person, or phone with responsive communications with staff through the online portal or phone
Experience	Follow through, customer service oriented, adequate provision of assistance	Assistance is targeted to address household energy assistance need

Table I: Provide flexible and sustained assistance that responds to emergent needs and eliminates sudden benefit decreases

Phase	Potential program design feature	Recommended program design
Experience	Budget for low-barrier discretionary funds that can be applied on an as-needed or emergency basis	The recommended program design does not have an as-needed or emergency assistance funding mechanism, which could be added if desired by the Legislature
Experience	Different assistance pathways that provide gradual rather than sudden program exit	The monthly bill assistance mechanism is tiered to provide gradual reduction in benefits as household incomes rise; income eligibility requirements take into account area median income, which is often higher than income criteria of federal assistance programs, thereby

Phase	Potential program design feature	Recommended program design
		avoiding a sudden drop in household assistance overall

Household survey insights

Commerce partnered with community-based organizations in Clark, Ferry, King, Snohomish, Spokane, and Yakima counties.

The survey was made available in nine languages to better reach a diverse sample of respondents. The survey was provided digitally and physically in Arabic, Chinese (simplified and traditional), Spanish, Vietnamese, Somali, Russian, Ukrainian, and Tagalog.

337 individuals completed surveys. Open-ended questions were translated and standardized by Commerce. The survey did not ask for demographic information such as age, race, income, or household size. Survey results are not statistically significant, but provide insights into how low-income households currently access energy assistance programs and their thoughts around certain program design elements.

Additional survey details are provided in Appendix G: Household surveys.

Key survey findings

Surveyed households overwhelmingly favored universal access to monthly bill assistance

Almost all (95%) of the survey participants said low-income households should have the same ability to access bill assistance regardless of where they live.

A majority of survey households favored income tiered monthly bill assistance

Most survey participants (63%) believe low-income households with lower incomes should receive a higher bill discount, and those with more income should receive less of a discount.

Surveyed households supported categorical eligibility

Most survey participants (78%) agree that the enrollment process for assistance should be minimal if a household is already enrolled in another statewide low-income program.

Surveyed households overwhelmingly favored multiple ways to enroll in programs

Almost all survey participants (96%) agree that enrollment should be available online, over the phone, or at any local community service center serving low-income households.

Online and phone enrollment options were the most chosen responses for how households would like to enroll with in-person options also chosen lots

When asked where they would most want to be able to sign-up for statewide or local energy assistance programs, participants overwhelmingly said online. 119 participants selected more than one answer.

- 61% of survey participants selected online
- 44% of survey participants selected phone
- 22% of survey participants selected local DSHS office
- 18% of survey participants selected community action agency
- 16% of survey participants selected multicultural service center

When asked they primary reasons why survey participants wanted to enroll in an energy assistance program, survey participants said:

- 47% of survey participants included wanting to save money for me and my family
- 41% of survey participants included wanting to save money to help afford other housing costs
- 27% of survey participants included wanting to avoid being disconnected from power
- 35% of survey participants included wanting to save money for food
- Only 7% of survey participants included the statement that their home is not comfortable because it is either too hot or cold.

Most survey participants were not enrolled in utility bill assistance programs or LIHEAP

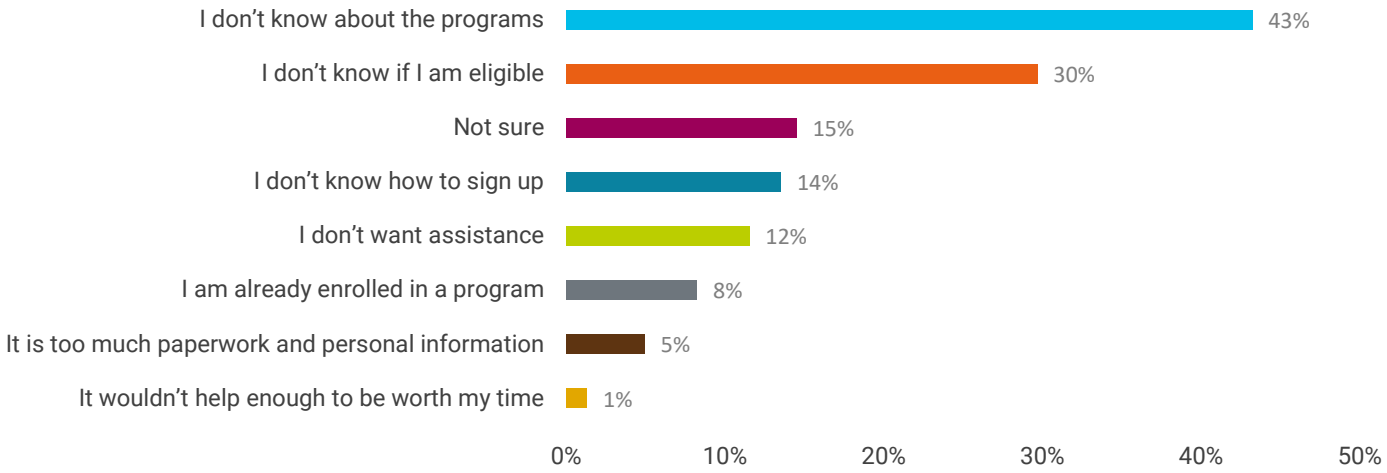
Most survey participants said they were not enrolled in LIHEAP or a utility program (72%). 9% of survey participants said they were not sure if they were enrolled in LIHEAP utility program, and 10% said they were not sure if they were enrolled in a utility bill assistance program.

Most survey participants are unaware of utility programs, which may or may be available to them

When asked why they weren't enrolled in utility bill assistance programs, 43% said they weren't aware of the programs, 30% said they didn't know if they were eligible, 15% responded they were unsure, and 14% said they didn't know how to sign up. [23]

[23] See Appendix G: Household surveys

Figure 2: Why survey participants are not enrolled in utility bill assistance programs



Suggestions for improving outreach and enrollment from survey participants

Survey participants said participation could be increased by expanding eligibility requirements, increased guidance on how to sign up, and bundling program communications and enrollment processes with other low-income assistance programs.

Methods to increase awareness included traditional methods such as flyers, TV and news ads, texts, social media posts, radio, and bill inserts.

Some participants recommended specific public places that could help spread awareness, such as the local PUD, community centers, parks schools, food banks, grocery stores, and libraries.

A few survey participants noted the importance of disseminating information in culturally relevant ways, such as in alternative languages and through trained and unbiased facilitators. Other participants noted that sites that already offer low-income assistance would be good places to provide the information, such as refugee centers, non-profits, senior centers, and DSHS offices.

Reflecting survey results in the recommended program design

The preferences of households with the recommended program design are reflected in the statewide monthly low-income energy assistance program design.

Table J: Comparison of household survey results and recommended program design

Survey results	Recommended program design
Almost all (95%) of the survey participants said low-income households should have the same ability to access bill assistance regardless of where they live	Low-income households could access monthly low-income energy assistance regardless of their utility or home fuel source
Most survey participants (63%) believe low-income households with lower incomes should receive a higher bill discount, and those with more income should receive less of a discount	Low-income households with less income would receive a larger discount than low-income households with higher incomes

Survey results	Recommended program design
Most survey participants (78%) agree that the enrollment process for assistance should be minimal if a household is already enrolled in another statewide low-income program	Enrollment is streamlined and does not require households submit additional income document if they are already enrolled in a statewide low-income program and provide their SSI or DSHS account number
Almost all survey participants (96%) agree that enrollment should be available online, over the phone, or at any local community service center serving low-income households	Low-income households can enroll online, over the phone, or in-person at any community service center

Community based organization insights

There were many insights from listening sessions with local service providers for low-income households yielded, what challenges they encounter, and what they need to connect households to services.[24]

Below are summary findings from the six in-person listening sessions and virtual workshop with service providers. Commerce identified common themes, which are highlighted below, along with responses from the sessions that underline statewide themes.

A full description of these sessions and detailed summary is included in Appendix H: Community organization listening sessions summary.

Low-income households are resilient, care for and contribute to their families and communities

> **"Their resiliency, determination, and hopefulness"**
>
> — Community based organization, Port Angeles

> **"How hard [low-income households] work to make ends meet."**
>
> — Community based organization, Spokane

> **"They are persistent and clearly know what they need to help improve their quality of life"**
>
> — Community based organization, Seattle

> **"Their ability to change and grow for the better."**
>
> — Community based organization, Stevenson

[24] See Appendix H: Community Organization Listening Sessions Summary

Additional insights from local service provider about what is most inspirational about the clients you serve?

- Their resiliency
- How resilient and enduring they are with what little they have
- Many of them go through a lot of challenges but still keep going
- They think outside the box
- How hard they work to make ends meet
- They are persistent and clearly know what they need to help improve their quality of life
- Desire to provide for their families
- Their ability to change and grow for the better

See Appendix H: Community organization listening sessions summary

Low-income and working class households and local service providers encounter many obstacles to accessing social services

> **"Inequitable distribution of resources and access to resources"**
>
> — Community-based organization, Seattle

> **"Gaps in eligibility leave households in need"**
>
> — Community-based organization, Stevenson

> **"Documentation stress and complicated requirements"**
>
> — Community-based organization, Kennewick

> **"No access to be able to apply"**
>
> — Community-based organization serving Southeast Washington, Spokane

Additional insights from service provider about what challenges do service providers encounter most when serving clients?

- Lack of clarity on how to access programs
- Complexity of requirements to access programs
- Too many steps to access resources
- Funder restrictions
- Strict guidelines that are not flexible
- Digital and technological navigation, particularly for older clients
- Being underserved, marginalized, and racial discrimination
- Getting people to come to resource events, despite many methods of advertising
- Explicit and implicit biases
- Language barriers
- Poverty stigmas

See Appendix H: Community organization listening sessions summary

Low-income and households need highly visible, easily accessible programs

> **"Greater programmatic visibility. It sometimes seems like services and resources are hidden"**
>
> — Community-based organization, Stevenson

> **"Minimizing documentation and [using] self-attestation would help reduce documentation and barriers. Clients can get discouraged when they see all the documentation required"**
>
> — Community-based organization, Port Angeles

> **"Multiple entities enrolling customers and categorical eligibility should be provided based on participation in other programs all with the mindset that no door is the wrong door when it comes to applying for and receiving assistance"**
>
> — Community-based organization, Virtual

> **"Both outreach and enrollment should be conducted with trusted community partners—would add interested parties to that because often those trusted community partners have no bandwidth to do new work, so it would be important to consider how to bring new partners into this work"**
>
> — Community-based organization, Colville

Insights from service provider workshop responses to the question: What do clients need to successfully access resources?[25]

- Structure, predictability, and certainty
- Clear, simple processes to access resources—not having to jump through hoops to access what they need
- Give what is needed and get out of the way
- For resources to be there now and in the future
- Systems that reflect who they are
- Culturally appropriate services and accommodations
- Help from people who look like them
- Culturally-specific resources for providers

[25] See Appendix H: Community organization listening sessions summary

Overlap between household service provider insights

Table K summarizes common themes from community based organizations and low-income households, and opportunities to address the identified program issues through program design.

Table K: Design opportunities

CBOs* shared…	Households shared…	Opportunity
Greater program visibility is desirable, with multiple access points	A wide range of communication methods meets people where they are, increases visibility, and expands program reach.	Utilize a variety of trusted sources to help households learn about the program.
Programs are challenging to access and navigate. Multicultural services should be provided.	Embrace accessibility and transparency to shift power imbalances between households and programs.	Design intentional opportunities for participants to influence program terms and service offerings.
Eliminate unnecessary application barriers or adversarial program requirements.	Close assistance gaps by reducing unreasonable criteria and administrative barriers.	Develop flexible criteria that promotes adequate financial living standards.
Follow-ups are important and should provide ongoing support.	Build relationships to understand and meet needs in real time.	Center building and maintaining meaningful relationships in the program.
Programs should provide structure, predictability, and certainty.	Be clear about what is being offered and follow through on providing what was promised.	Develop guidelines and processes that result in clear and reliable assistance.
Households need to be treated with dignity and respect.	Provide flexible and sustained assistance that responds to emergent needs and eliminates sudden benefit decreases.	Provide adequate assistance and gradual program exit that promotes long-term stability.

*community based organizations

Co-created program design principles

Commerce collected input from these groups to inform a statewide program design. Potential program participant experiences were centered throughout the conversations, and the resulting principles reflect areas of general consensus across the groups.

Program principles developed with utility and statewide low-income advocates

Commerce held four workshops through the fall of 2023 to gather input from utilities and statewide low-income advocates to co-develop program design principles. Commerce then workshopped the principles with local service providers across the state through the fall and winter of 2023.

The co-designed principles include:

- The program should minimize documentation required to enroll

- The program should have multiple application and enrollment methods, including methods that do not require internet access or travel to a physical location
- Categorical eligibility should be provided based on participation in other low-income assistance programs
- The program administrator should be able to cross-enroll customers in other low-income assistance programs
- Multiple entities should be able to enroll customers in a statewide program
- There should be a quick turnaround time from submission of application to receiving the benefit
- Self-attestation with limited documentation with a small set of random income verification could balance program accessibility and integrity goals
- Immigration status should not affect eligibility
- Both outreach and engagement should be conducted with trusted community partners
- Utilities could post or distribute outreach materials with consistent messaging
- Program materials and communications should use plain language, be trauma informed, and be available in multiple languages
- Communications and services should be available in multiple languages with translation services available on request.
- Outreach efforts should precede program launch

Additional principles from local service providers

The program design principles developed through workshops with utilities and statewide advocacy organizations. Through discussions with community organizations that specialize in serving low-income households, additional principles were identified to help guide the design of a statewide program. These principles include:

- No systems that are long and complicated
- The program should have a quick turnaround time from submission of the application to receiving the benefit
- Multilingual communications should be vetted by first-language speakers
- The program should acknowledge low-income seniors tend to live on fixed incomes, and reduce frequency of application renewals for these households
- The program should avoid benefits cliffs
- Program materials and communications should raise awareness about the benefits of conservation
- A statewide monthly low-income energy bill assistance program should include Black, Indigenous, and People of Color and other historically marginalized communities in the development and implementation of energy assistance program if the Legislature chooses to create a program

Co-designed principles guiding program development

The principles developed through workshops with community organizations and utilities and statewide low-income advocates were used to develop the statewide low-income energy assistance program alongside the insights of low-income households and system constraints.

Conclusion

Low-income households are resilient and take initiative to meet their needs, but fragmented program landscapes and an inequitable distribution of resources and program access mean many don't receive help.

When programs are available, they often have lengthy and unnecessary enrollment requirements. Households that manage to enroll only receive one-time assistance, which does not provide sustained, stable support that gradually reduce benefits as households move up the economic ladder.

Visible programs, clear and simply enrollment requirements, multiple ways to enroll, and culturally responsive programs were among the most cited elements for successfully reaching low-income households. Proactively addressing racism and poverty stigmas through program design were also frequently mentioned. These insights help guide Commerce's review of Washington laws and the utility monthly energy bill assistance programs, and Commerce's recommended program design.

Energy burden and assistance need in Washington

Background

The expertise and lived experiences of low-income households listened to and surveyed as part of this study are echoed in the data on household energy burden, assistance need, and energy insecurity. The next two sections of this report focus on the data.

Definitions

A household is considered energy burdened when its residential energy bills exceed 6% of its gross income. Energy assistance need is the amount of funding needed to reduce home energy bills of a low-income household to 6% of its gross income. Total energy burden refers to the sum of every household's energy burden in the state.

Highlights

- More than 270,000 low-income households in Washington state (25% of low-income households) are energy burdened—that is, they spend more than 6% of their household incomes on residential energy bills
- On average, these households spend $1,016 in excess of their home energy bills annually after taking the comparatively low electric rates of many Washington utilities into account
- The total statewide energy burden of low-income households is $275 million after taking the comparatively low electric rates of many Washington utilities into account
- Nearly a fifth (about 17%) of low-income households in urban counties are energy burdened, and nearly two fifths (38%) of low-income households are energy burdened in rural counties

Low-Income Energy Affordability Data (LEAD) Tool

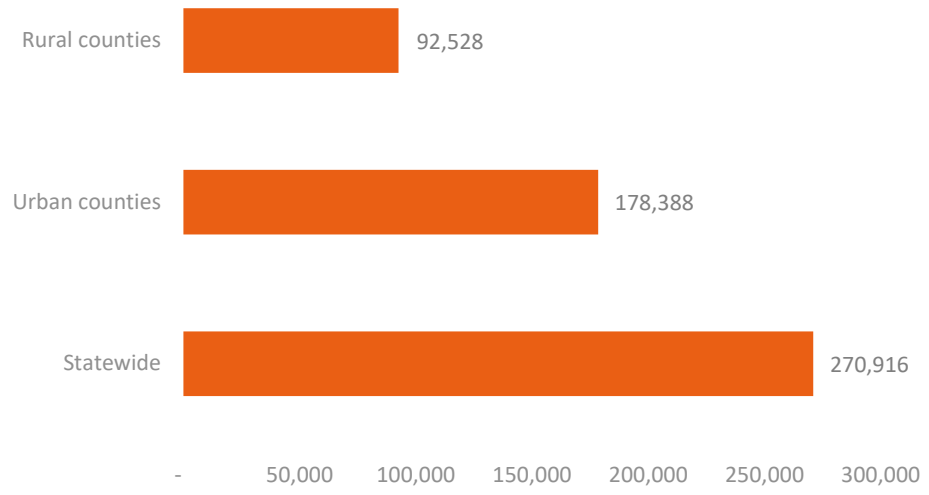
The federal Department of Energy (DOE) and the National Renewable Energy Lab (NREL) provide national, state, and local energy burden data through the Low-Income Energy Affordability Data (LEAD) Tool. It is the only statewide resource for understanding energy burden and assistance need in Washington. A full description of the DOE LEAD Tool and a summary of its strengths and weaknesses is provided in Appendix B: The Low-Income Energy Affordability (LEAD) Tool. The DOE LEAD Tool was last updated in 2024 with American Community Survey 5-year estimates for 2018-2022.

Energy burden and assistance need

The DOE LEAD Tool estimates that 25% of low-income households — which represents more than 270,000 households statewide — spend more than 6% of their household income on energy bills and are therefore energy burdened. The average annual household energy burden in excess of 6% of a household income is $1,016. This amounts to $1,016 million in energy assistance need statewide. These costs include residential, electricity, natural gas, propane, and other home heating and fuel costs, and they reflect the comparatively low electric rates charged by many Washington utilities. They do not include transportation-related costs.

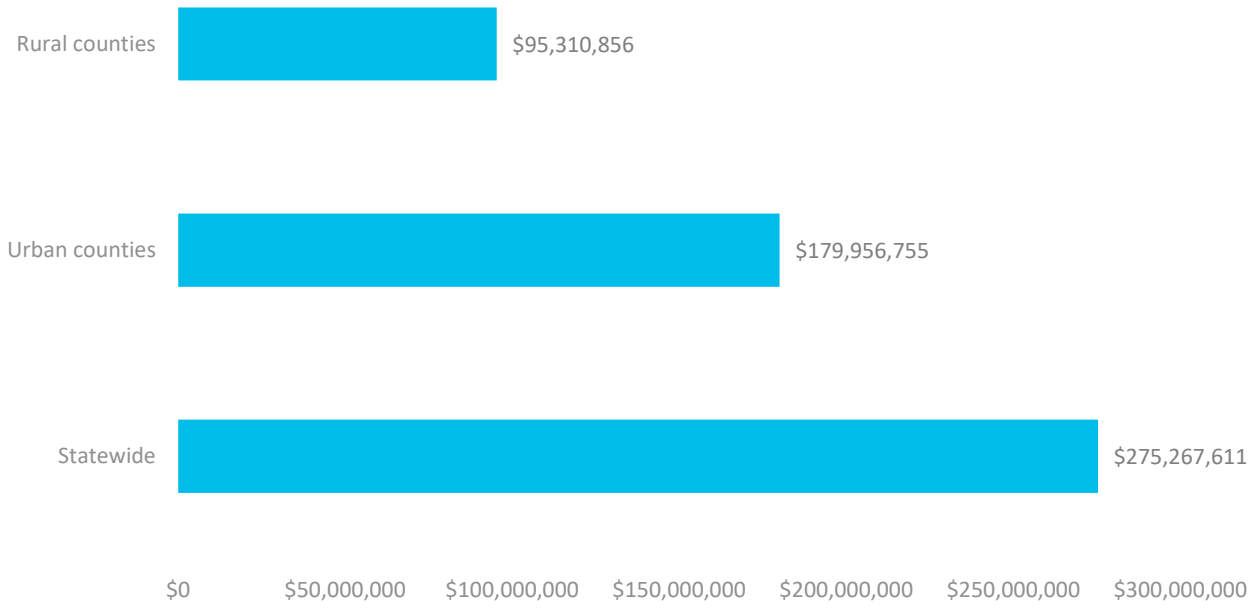
The number of energy burdened households and total energy burden are greatest in urban counties

Figure 3: Number of low-income households that are energy burden in rural and urban counties



Source: Commerce calculations using U.S. Department of Energy Low-income Energy Assistance Data WA DOE LEAD Tool Data | Powered by Box

Figure 4: Total energy burden in urban and rural counties

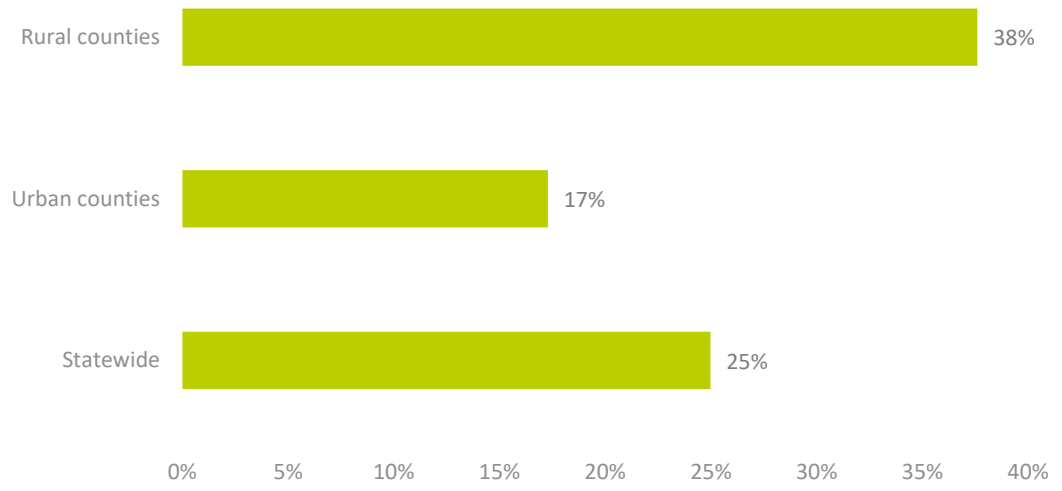


Source: Commerce calculations using U.S. Department of Energy Low-income Energy Assistance Data WA DOE LEAD Tool Data | Powered by Box

Figure 4 shows rural counties have a greater percentage energy burdened low-income households than urban counties. These same rural counties tend to have average per household energy burdens equal to or greater than urban counties. The mid-Columbia counties (Chelan, Douglas, and Grant) fall outside this pattern.

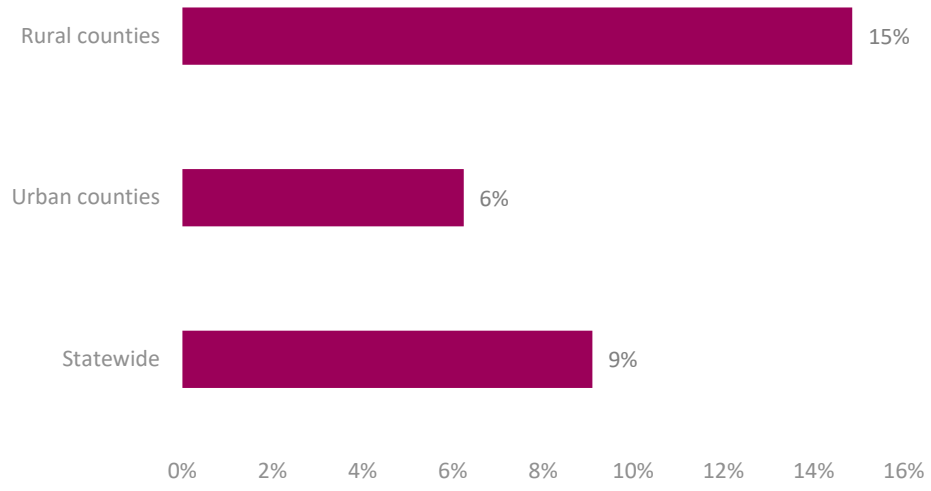
Rural counties are disproportionately energy burdened

Figure 4: Percent of low-income households that are energy burdened



Source: Commerce calculations using U.S. Department of Energy Low-income Energy Assistance Data WA DOE LEAD Tool Data | Powered by Box

Figure 5: Percent of energy burdened low-income households out of the total population



Source: Commerce calculations using U.S. Department of Energy Low-income Energy Assistance Data WA DOE LEAD Tool Data | Powered by Box

While rural counties are disproportionately energy burdened (see Figure 5), their total excess burden is often far less than their urban counterparts. For example, 81% of low-income households in Ferry County have an average annual energy burden per household of $1,354. The excess burden for all low-income households in

Ferry County totals just over $1.6 million annually. That compares to 17% of low-income households being energy burdened in King County. Low-income households in King County average an annual household burden of $1,188. The total annual excess burden for all low-income households in King County is about $63 million.

The rural electric utility dilemma

Many of the rural counties with disproportionately burdened populations are served by relatively small electric utilities. For instance, Ferry County is served by Ferry County PUD No 1 — one of the state's smallest utilities. It has 0.8% of the residential customers and 1.7% of the revenues of Seattle City Light.[26] Its service territory is one of the most low-income and energy burdened parts of the state yet it illustrates the difficulties that rural utilities with a disproportionate share of low-income households face.

It may be difficult for Ferry County PUD No 1 to provide ratepayer-funded energy assistance sufficient to address the energy burden of its low-income households without rate hikes, because of its high proportion of low-income, energy-burdened customers compared to larger utilities, such as Seattle City Light. Fully addressing the energy burden of low-income customers for utilities with a disproportionate share of low-income customers could result in other customers becoming energy burdened themselves.

Table L: Household energy burden by county

County	Number of energy burdened low-income households	Percent of low-income households that are energy burdened	Percent of energy burdened low-income households of total population	Average energy burden for energy burdened low-income household	Total excess burden of energy low-income households
Adams	896	33%	14%	$998	$893,607
Asotin	1,581	40%	17%	$963	$1,522,072
Benton	5,609	22%	7%	$866	$4,854,892
Chelan	1,069	10%	4%	$415	$443,673
Clallam	5,422	41%	16%	$989	$5,359,706
Clark	12,903	18%	7%	$741	$9,562,209
Columbia	405	60%	22%	$1,195	$484,052
Cowlitz	4,139	25%	10%	$811	$3,357,312
Douglas	579	12%	4%	$562	$325,358
Ferry	1,243	**81%**	**41%**	$1,354	$1,683,084
Franklin	2,433	23%	9%	$880	$2,140,430
Garfield	271	60%	27%	$1,559	$422,967

[26] Annual Electric Power Industry Report, Form EIA-861 detailed data files

County	Number of energy burdened low-income households	Percent of low-income households that are energy burdened	Percent of energy burdened low-income households of total population	Average energy burden for energy burdened low-income household	Total excess burden of energy low-income households
Grant	2,955	21%	9%	$705	$2,083,758
Grays Harbor	5,837	46%	20%	$1,064	$6,211,221
Island	4,729	40%	13%	$1,075	$5,081,798
Jefferson	3,323	53%	21%	$1,251	$4,157,131
King	**53,220**	17%	6%	$1,188	**$63,225,460**
Kitsap	10,124	27%	10%	$1,264	$12,791,480
Kittitas	3,286	40%	17%	$1,079	$3,545,054
Klickitat	2,058	56%	21%	$1,049	$2,159,310
Lewis	5,474	44%	17%	$853	$4,668,437
Lincoln	838	49%	18%	$1,184	$991,923
Mason	4,056	47%	16%	$1,189	$4,822,050
Okanogan	5,609	73%	33%	$1,171	$6,566,812
Pacific	1,569	34%	15%	$1,122	$1,760,451
Pend Oreille	1,231	51%	21%	$1,211	$1,490,330
Pierce	26,769	22%	8%	$985	$26,361,306
San Juan	2,008	64%	23%	**$1,561**	$3,133,877
Skagit	6,726	38%	13%	$1,032	$6,941,844
Skamania	1,449	70%	30%	$1,332	$1,930,498
Snohomish	20,241	18%	7%	$873	$17,663,347
Spokane	27,502	33%	13%	$807	$22,189,622
Stevens	4,123	54%	22%	$1,276	$5,261,346
Thurston	11,587	27%	10%	$999	$11,572,296
Wahkiakum	490	56%	25%	$1,433	$702,541
Walla Walla	3,001	33%	13%	$1,034	$3,103,309
Whatcom	10,432	30%	11%	$1,125	$11,736,144

County	Number of energy burdened low-income households	Percent of low-income households that are energy burdened	Percent of energy burdened low-income households of total population	Average energy burden for energy burdened low-income household	Total excess burden of energy low-income households
Whitman	3,926	43%	22%	$551	$2,162,197
Yakima	11,804	32%	14%	$1,009	$11,904,709

Source: Commerce calculations using U.S. Department of Energy Low-income Energy Assistance Data WA DOE LEAD Tool Data | Powered by Box

Other considerations

When examining energy burden and energy assistance need data, it is important to remember that just because a household energy bill is not greater than 6% of its income, it does not mean the household does not struggle to pay its home energy bills. Higher costs of living can reduce disposable household income and make it more difficult to pay home energy bills.

The impacts of energy burden on households

Background

This energy insecurity profile is based on data from the U.S. Department of Energy, Energy Information Administration, 2020 Residential Energy Consumption Survey (RECS). RECS results include information regarding housing type and structure, appliances and end uses, home energy consumption and expenditures, "energy insecurity," and household demographics. State-level RECS microdata was tabulated by National Consumer Law Center (NCLC) to generate the findings outlined below. Some variables, including those depicting ratio of income to poverty and home energy burdens, were calculated by NCLC using RECS microdata.[27]

Highlights

- More than one in five (22%) Washington households reported some form of energy insecurity in 2020; only 3.4% reported having ever participated in energy assistance
- About 11% of all Washington households showed chronic insecurity, in that they needed to forego necessities during some months or almost every month of the year; an additional 4% of all Washington households went without food, medicine or other necessities one or two months during the past 12 months
- Over 5% of all Washington households reported maintaining an unhealthy indoor temperature some months or almost every month, and an additional 4% reported unhealthy indoor temperature one or two months during the previous year

Energy insecurity

There is growing evidence demonstrating the links between high energy burdens,[28] energy insecurity,[29] and challenges related to housing, health, financial stability and debt.

According to results the 2020 RECS, about 13% of Washington households were energy burdened. National data and literature show that energy burdened households are about three times more likely than non-burdened households to receive an electric utility disconnection notice.

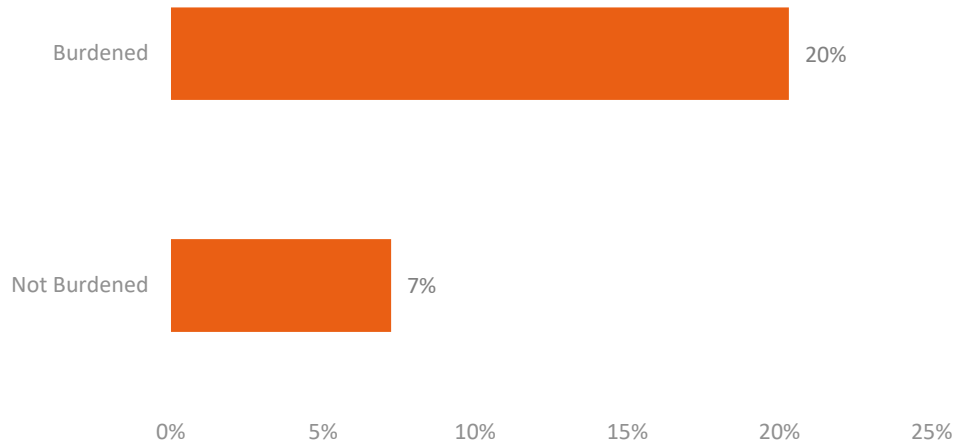
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[27] https://www.eia.gov/consumption/residential/data/2020/index.php?view=microdata

[28] "Energy burden" is defined as the proportion of household income devoted to paying for home energy service. Households with burdens of 6% or more are considered to be "energy burdened."

[29] "Energy insecurity" is defined broadly as the inability to adequately meet household energy needs. The U.S. Department of Energy/Energy Information Administration measures the prevalence of energy insecurity through the Residential Energy Consumption Survey (RECS) by querying respondents about frequency of forgoing other necessities to pay for home energy, maintaining unhealthy indoor temperatures, receipt of disconnection notices, and involuntary disconnection of home energy services or fuels. Columbia University researcher and professor Diana Hernandez noted that "(t)hose impacted by energy insecurity allocate a disproportionate share of their income to utilities-related expenses and encounter inefficiencies in the home such as older, and less efficient appliances and drafts that induce heat-loss. Concomitants of energy insecurity include extreme home temperatures, hazardous heating alternatives, and the constant threat of utility shut-offs or mounting arrearages in utility bills because of nonpayment. This problem is especially acute for low-income residents such as single parents, the elderly, the disabled, and others with low or fixed incomes." (Hernandez, "Energy Insecurity: A framework for Understanding Energy, The Built Environment, and Health Among Vulnerable Populations in the Context of Climate Change," American Journal of Public Health, April 2013).

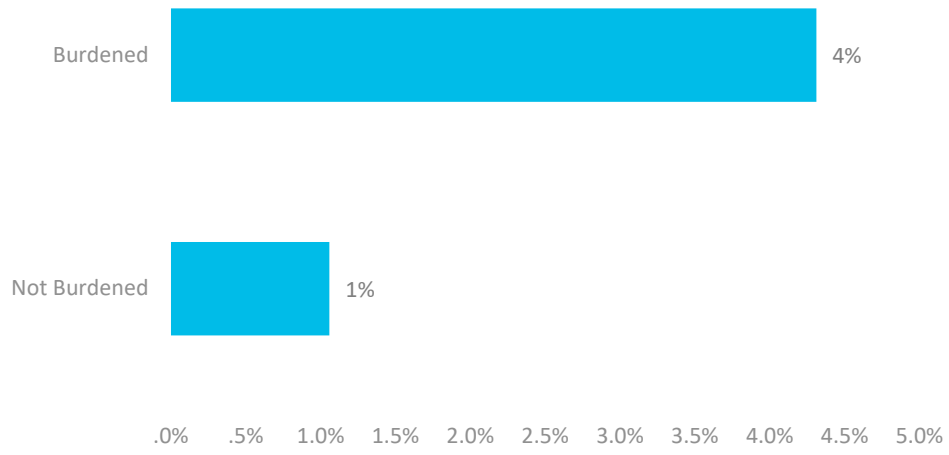
Figure 5: U.S. households that received disconnection notices by burden (2020)



Source: 2020 RECS microdata tabulated by National Consumer Law Center

Burdened households are about four times more likely than non-burdened households to experience involuntary loss of electric service and inability to operate indoor heating or cooling equipment.

Figure 6: U.S. households unable to use heating or cooling equipment in the past year because they could not afford electricity and it was disconnected (2020)



Source: 2020 RECS microdata tabulated by National Consumer Law Center

Loss of service, particularly as extreme temperatures and weather become more common, can bring grave consequences, particularly for households that include elders, infants, or those with illness or disability.

Energy insecurity variables

As indicated above, RECS results include variables related to energy insecurity. These variables include the frequency of:

- Forgoing necessities such as food or medicine to pay a home energy bill
- Maintaining unhealthy indoor temperatures to afford home energy service
- Receipt of disconnection notices
- Loss of service due to home energy bills or equipment repair expenses.

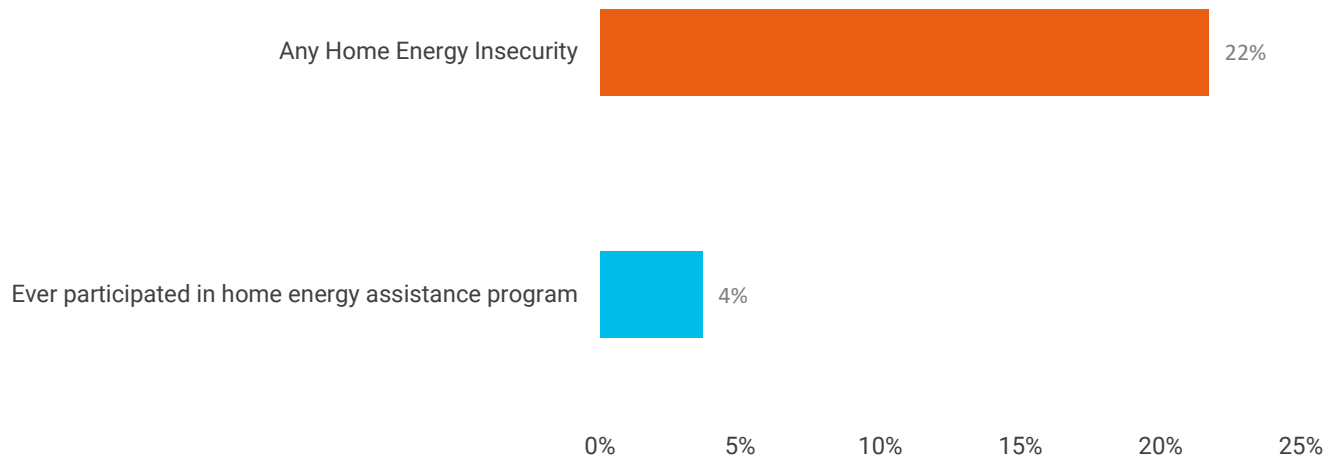
> **The presence of energy insecurity provides strong evidence of lack of affordability of essential home energy service for households experiencing such insecurity**
>
> -- National Consumer Law Center

These measures are commonly viewed as key indicators home energy affordability challenges.

Households are energy insecure, but not receiving assistance

Following is a chart illustrating the percentage of Washington households that experienced any form of energy insecurity in 2020, along with the percentage of households that have ever participated in an energy assistance program such as LIHEAP or ratepayer-funded bill assistance.

Figure 7: Home energy insecurity and energy assistance program participation in Washington (2020)



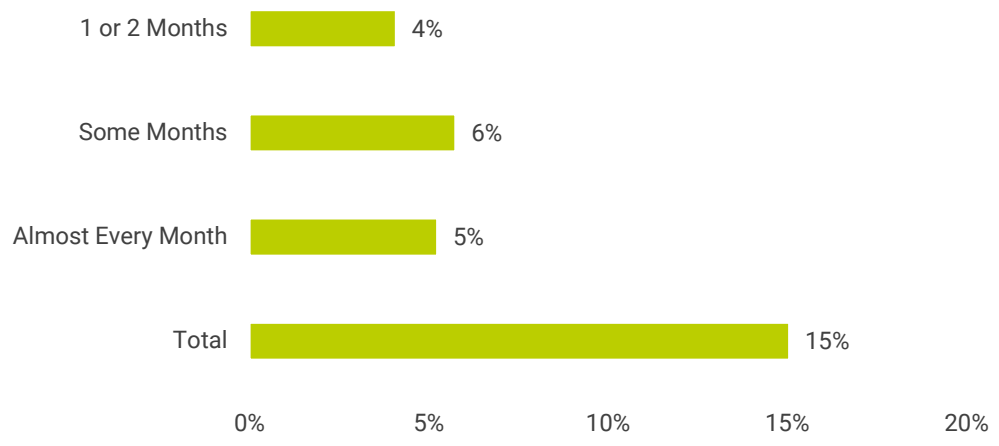
Source: 2020 RECS microdata tabulated by National Consumer Law Center

Figure 7 shows that, while over one in five Washington households reported some form of energy insecurity in 2020 alone, only 3.4% reported having ever participated in energy assistance. The overall portrait is of high need for programs and policies that enhance affordability.

Households are forgoing basic necessities and keeping their homes at unhealthy temperatures because of unaffordable home energy bills

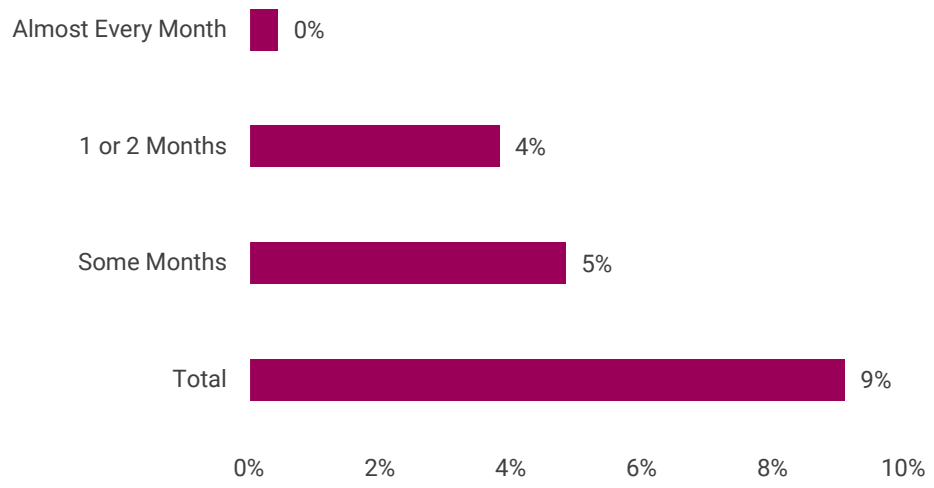
The next charts illustrate the frequency of households forgoing basic necessities because of unaffordable home energy bills and frequency of maintaining unhealthy indoor temperatures.

Figure 8: Frequency of Washington households reducing or forgoing basic necessities due to home energy bills (2020)



Source: 2020 RECS microdata tabulated by National Consumer Law Center

Figure 9: Frequency of Washington households keeping their homes at unhealthy temperatures (2020)



Source: 2020 RECS microdata tabulated by National Consumer Law Center

Chronic insecurity and other concerning cases

In 2020, about 11% of households showed chronic insecurity, in that they needed to forego necessities during some months or almost every month. An additional 4% of households went without food, medicine of other necessities 1 or 2 months during the past 12 months. More than 5% of Washington households reported maintaining an unhealthy indoor temperature some months or almost every month, while an additional 4% reported unhealthy indoor temperature one or two months during the previous year.

Unaffordable energy costs are not a standalone issue

The above findings suggest that that energy assistance need in Washington is not a "standalone" issue, but rather that it impacts other major challenges such as food insecurity and public health. At the same time, the data highlights very low participation in existing energy assistance programs, due perhaps to problems with program availability and funding, enrollment barriers, or a combination of challenges.

High energy burden and inability to meet financial obligations affect not only financial well-being, but also physical and psychological health. Because of high energy costs, low-income families often sacrifice spending on other important needs, such as groceries and medication, and reduce their energy usage in ways that harm their physical health

Energy burdens and housing instability

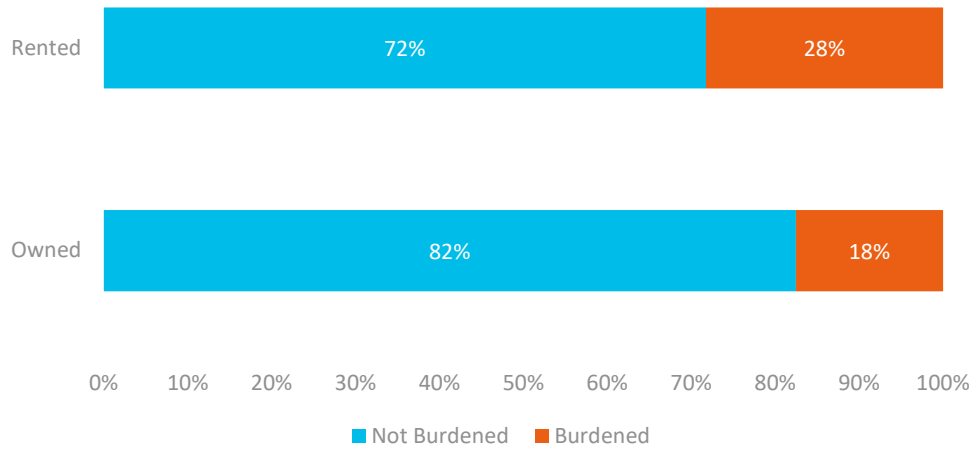
Energy insecurity and housing insecurity are inextricably linked. When monthly utility bills are unaffordable, the threat of disconnection lurks as a destabilizing force. Utility disconnections threaten housing stability for many, especially extremely low-income tenants.

Utility affordability challenges and energy insecurity are related to housing affordability. High rental or mortgage payments can strain household budgets and lead to late utility payments, past due account balances, disconnection notices and disconnection for non-payment. Similarly, in households lacking sufficient income to pay for basic necessities, unmanageable home energy costs put pressure on the ability to meet

rental or mortgage payment obligations. Effective bill assistance programming frees up household cash to pay for other necessities, such as housing costs.

As illustrated below, data from the 2020 RECS indicates that renters are 28% more likely than homeowners to carry energy burdens of 6% or more.

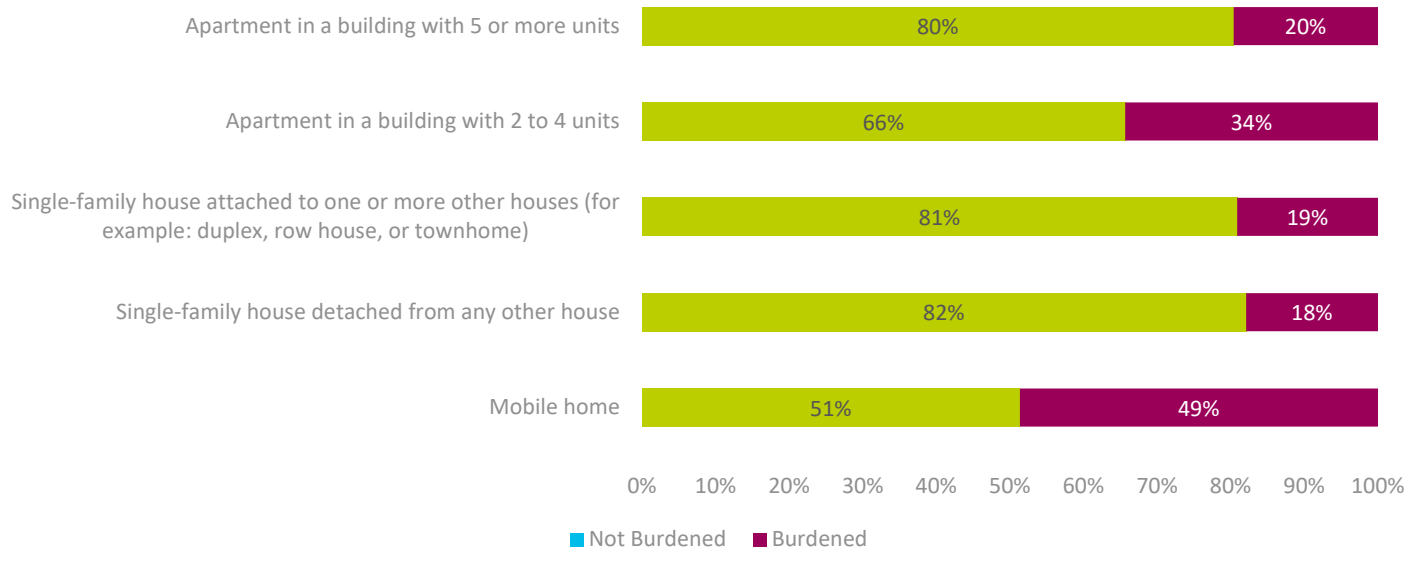
Figure 10: Frequency that U.S. renters or home owners are energy burdened



Source: 2020 RECS microdata tabulated by National Consumer Law Center

The data further show that, nationally, high energy burdens are most prevalent among residents of mobile home and small apartment buildings.

Figure 11: U.S. Energy Burden by Household Type



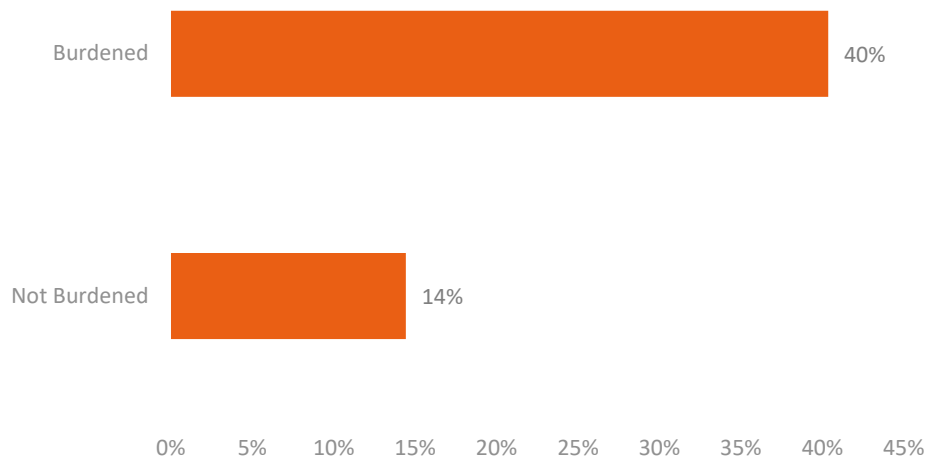
Source: 2020 RECS microdata tabulated by National Consumer Law Center

How energy burdens affect financially struggling customers first, before housing costs become a problem. For example, the U.S. Housing and Urban Development (HUD) Housing Choice Voucher (HCV) Program (Section 8) provides that building owners "may consider a family's history with respect to factors such as: payment of rent and utilities …"[30] Also, in many private-market leases, tenants are responsible for utilities and failure to maintain utility service can be considered a breach of the lease and grounds for terminating the tenancy and filing an eviction action in court.

Energy burden and its impact on the ability to afford other basic necessities

RECS data clearly illustrates that energy-burdened households are far more likely to forgo necessities such as food or medicine to pay home energy bills. The 2020 RECS included the following query: "In the past year, how many months did your household reduce or forego expenses for basic household necessities, such as medicine or food, in order to pay an energy bill?" Figure 12, based on calculations using the 2020 RECS microdata, indicates that 40% of households with home energy burdens of 6% or greater reported forgoing necessities such as food or medicine to stay connected to pay a home energy bill, in contrast to only about 14% of households with burdens below 6%.

Figure 12: Likelihood of low-income energy burdened households in the U.S. reducing or forgoing basic necessities due to home energy bill

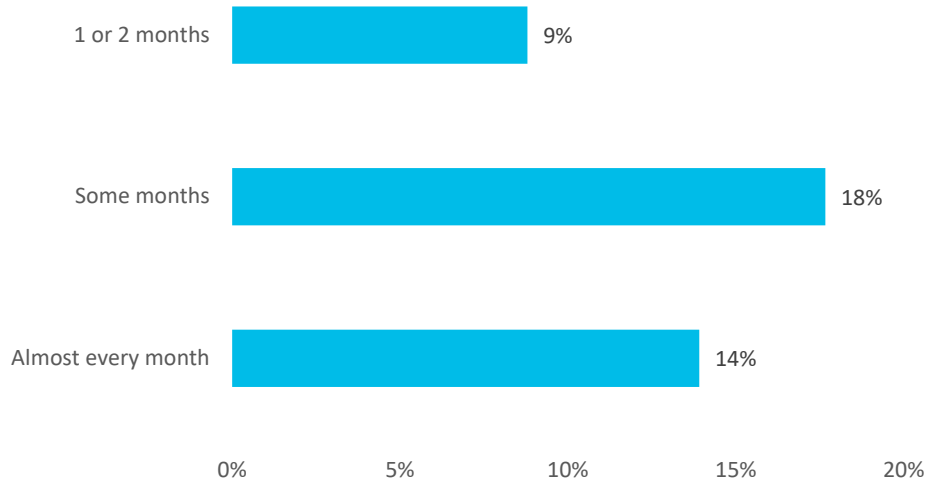


Source: 2020 RECS microdata tabulated by National Consumer Law Center

Clearly, going without food or medicine raises serious household and public health concerns. Over 30% of burdened households experience this "heat or eat" insecurity on a chronic basis (almost every month or some months).

[30] Seattle Housing Authority, HCV Program, Administrative Plan available at: https://www.seattlehousing.org/sites/default/files/HCV%20Administrative%20Plan%204.17.24.pdf

Figure 13: Frequency of reducing or forgoing basic necessities due to home energy bill by energy burdened low-income households in the U.S. by month



Effective bill assistance programming that lowers home energy bills to a more affordable level is necessary to mitigate these threats to health.

Energy burden negatively impacts physical and mental health.

There is growing evidence documenting the links between high energy burdens and negative health effects. For example, there is evidence in peer-reviewed studies of heightened respiratory illness and weight gain deficiencies in infants, as well as adult and adolescent mental health effects.[31] In a 2016 study, Columbia University's Diana Hernandez found that households facing various forms of energy insecurity correlate to high levels of asthma, chronic stress, and mental health triggers.[32]

The sacrifices families make to avoid disconnection from power also pose direct risks to their physical health. For example, families may reduce their energy usage by setting their thermostat at extreme temperatures, resulting in unhealthy home temperatures.

[31] Christine Liddell, Chris Morris, "Fuel poverty and human health: A review of recent evidence," Energy Policy, Volume 38, Issue 6, 2010, Pages 2987-2997,
[32] Diana Hernández, "Understanding 'energy insecurity' and why it matters to health," Social Science & Medicine, Volume 167, 2016, Pages 1-10.

Maintaining unhealthy temperatures in the home to avoid disconnection places families at risk of hypothermia and heat stress.[33] Among older adults and chronically-ill individuals, such extreme hot or cold temperatures in the home, may result in preventable deaths.[34] And skipping medications to pay utility bills exacerbates the health problems of individuals with chronic conditions, such as hypertension or diabetes, which disproportionately affect marginalized groups.[35]

Loss of utility service can also result in displacement from the home, and raise the risk of investigation by child protection agencies, creating significant psychological stress for families. Carrying debt of any sort also causes psychological distress, due to the fear of never being able to pay the debt or dealing with aggressive debt collectors.[36] Most debts in collections are for low-balance, non-financial accounts, such as utility bills;[37] in fact, past-due utility bills are one of the most frequent sources of collections items in consumer credit reports.[38]

Most debts in collections are for low-balance, non-financial accounts, such as utility bills. In fact, past-due utility bills are one of the most frequent sources of collections items in consumer credit reports.

Sources: Consumer Financial Protection Bureau and the Urban Institute.

Contact with a debt collector is a common experience for Americans, and it is one of the most common reasons for complaints to the Federal Trade Commission.[39] Consumers report debt collectors contacting them too often and even threatening them.[40] This stress increases an individual's risk of anxiety, depression, substance use disorders, and other mental health disorders.[41]

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[33] Hernández, D. and J. Laird, Surviving a Utility Shutoff: U.S. Households at Greatest Risk of Utility Disconnections and How They Cope (American Behavioral Scientist, May 2021), DOI:10.1177/00027642211013401; see also Klinenberg, E., Dying alone: The social production of urban isolation, *Ethnography*, 2(4), 501-531. https://doi.org/10.1177%2F14661380122231019.
[34] Hernández, D. and J. Laird, Surviving a Utility Shutoff: U.S. Households at Greatest Risk of Utility Disconnections and How They Cope (American Behavioral Scientist, May 2021), DOI:10.1177/00027642211013401; see also Klinenberg, E., Dying alone: The social production of urban isolation, *Ethnography*, 2(4), 501-531. https://doi.org/10.1177%2F14661380122231019.
[35] Hernández, D. and J. Laird, Surviving a Utility Shutoff: U.S. Households at Greatest Risk of Utility Disconnections and How They Cope (American Behavioral Scientist, May 2021), DOI:10.1177/00027642211013401; see also Haynes, Berneta, The Racial Health and Wealth Gap: Impact of Medical Debt on Black Families (National Consumer Law Center, March 2022) (also discussing the connection between chronic conditions and burdensome medical debt), available at https://www.nclc.org/wp-content/uploads/2022/09/RacialHealth-Rpt-2022.pdf.
[36] Body, Dyvonne, The Burden of Debt on Mental and Physical Health (The Aspen Institute, Aug. 2, 2018)
[37] Market Snapshot: Trends in Third-Party Debt Collections Tradelines Reporting (Consumer Financial Protection Bureau, Feb. 2023), available at https://files.consumerfinance.gov/f/documents/cfpb_market-snapshot-third-party-debt-collections-tradelines-reporting_2023-02.pdf.
[38] Thompson, Kelly et. al, Overview: Access to Utility Data for Underwriting Credit (Urban Institute, 2021), available at https://www.urban.org/sites/default/files/2022-03/access-to-utility-data-for-underwriting-credit.pdf (also noting "but only about 3 percent of consumers with utility accounts are estimated to have tradelines reflecting routine payment history in their credit files with Equifax, Experian, or TransUnion").
[39] Consumer Sentinel Network: Data Book 2021 (Federal Trade Commission, Feb. 2022), available at https://www.ftc.gov/reports/consumer-sentinel-network-data-book-2021.
[40] Consumer Experiences with Debt Collection: Findings from the CFPB's Survey of Consumer Views on Debt (Consumer Financial Protection Bureau, Jan. 2017).
[41] R. Jenkins et al., *Debt, Income, and Mental Disorder in the General Population*, 38 Psychol. Med. 1485, 1490 (2008) ("The more debts people had, the more likely they were to have . . . alcohol dependency and drug dependency."); see also Elizabeth Sweet, Arijit Nandi, Emma K. Adam, & Thomas W. McDade, *The High Price of Debt: Household Financial Debt and its Impact on Mental and Physical Health*, 91 Soc. Sci. & Med. 94, 95 (2013) ("several empirical studies have found that financial strains such as personal debt and home foreclosures are strong predictors of depression, general psychological distress, mental disorders, suicidal ideation and behavior"); see

The psychological burden of carrying debt leads to feelings of hopelessness, shame, and despair.[42] Moreover, studies show a relationship between carrying debt and risk of suicidal ideation.[43] Suicidal ideation is common enough that debt collectors frequently report encountering suicidal customers. A 2017 survey of debt collection organizations found that one in four frontline staff reported having spoken to at least one customer in the past year who seemed serious about committing suicide.[44]

Reliable utility service is a life necessity, meaning utility bill assistance represents a lifeline for many struggling families.

Loss of utility service results in dangerous and potential lethal living conditions for vulnerable groups, including children, chronically-ill people, and older adults. Disconnections and the fear of disconnections place undue stress on families as well, contributing to significant mental health harms. Bill assistance reduces these harms by helping families keep the lights and heat on.

The psychological burden of carrying debt leads to feelings of hopelessness, shame, and despair. Some studies have even shown a correlation between carrying debt and increased risk of suicide.

Sources: H. Meltzer et al., Personal Debt and Suicidal Ideation, 41 Psychol. Med. 771 (2011); Chris Fitch et al., Vulnerability: A Guide for Debt Collection (Personal Finance Research Center, Mar. 2017).

Unfortunately, quantifying the impacts of bill assistance presents an analytical challenge. For example, little public data exists about accounts in arrears and disconnections of utility service.[45] However, quantification challenges should not lead to the conclusion that bill assistance has no impacts on mental and physical health. Rather, these challenges suggest that decisions regarding the adoption and implementation of low-income bill assistance programs should not hinge entirely on the results of overly simplified impact assessments.

Excessive energy burdens lead to borrowing through credit cards, payday loans, and other financial products that push low-income households further into poverty

Energy burden and poverty are intertwined, and some researchers argue that high energy burdens and unaffordability of energy utility services push consumers into poverty.[46]

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also Thomas Richardson, Peter Elliott, & Ronald Roberts, *The Relationship Between Personal Unsecured Debt and Mental and Physical Health: A Systematic Review and Meta-Analysis*, 33 Clinical Psychol. Rev. 1148, 1154 (2013) ("Odds ratios demonstrate more than a three-fold risk of a mental disorder in those with debt, or alternatively a three-fold risk of debt in those with a mental disorder.").

[42] H. Meltzer et al., *Personal Debt and Suicidal Ideation*, 41 Psychol. Med. 771 (2011) ("Feelings of hopelessness partially mediated the relationship between debt and suicidal ideation.").

[43] H. Meltzer et al., *Personal Debt and Suicidal Ideation*, 41 Psychol. Med. 771 (2011).

[44] Chris Fitch et al., Vulnerability: A Guide for Debt Collection (Personal Finance Research Center, Mar. 2017), p. 54, available at https://www.bristol.ac.uk/media-library/sites/geography/pfrc/pfrc1701-21-steps-vulnerability-and-debt-collection-(web).pdf.

[45] What States Can Do to Help Consumers Energy Insecurity (National Consumer Law Center, January 2020), available at https://www.nclc.org/wp-content/uploads/2022/08/energy-insecurity-one-pager-1.pdf. Energy Burdens and Debt

[46] J. Bohr, A. McCreery, *Do Energy Burdens Contribute to Economic Poverty in the United States? A Panel Analysis,* Oxford University Press on behalf of the University of North Carolina at Chapel Hill, 2019, p. 4;

To pay for household necessities including utility service, low-income families may resort to borrowing through credit cards, payday lending, and other financial products such as paycheck advance apps.[47] Borrowing leads to additional financial pressures. The average annual percentage rate (APR) for credit cards reached 22.8% in 2023,[48] and interest costs put further financial burdens on families.[49] For years, utilities were one of the most common reasons consumers resort to payday loans.[50] Climate change and extreme weather may exacerbate this problem.[51]

Measures to reduce household energy burdens, such as monthly bill assistance, can have a beneficial impact on the financial health of low-income families, enabling them to repay borrowed funds and avoid debt collection actions.[52]

Arrearages

There is a great deal of evidence demonstrating that low-income households are more likely to experience a broad range of energy insecurities, including carrying seriously past due balances on their utility accounts. For example, a recent comprehensive electric utility affordability report from North Carolina concluded that households with income below 200% of the federal poverty level were far more likely to struggle with arrears.[53] Bill assistance programs, making payments more affordable for utility customers with low incomes, are required to reduce the likelihood that customers will accumulate seriously past accrued accounts and face disconnection for nonpayment.

Conclusion

Commerce heard from low-income households and community organizations that home energy is an essential need that underpins other basic needs. The Washington-specific, regional, and national data and case studies support these observations and point to harmful coping mechanisms to pay their home energy bill.

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https://jeremiahbohr.github.io/pages/publications/Bohr%20McCreery_2020_SF.pdf, citing B.K. Sovacool, R.V. Sidortsov, & B.R. Jones, *Energy Security, Equality and Justice* (1st ed.), Routledge (2013), https://doi.org/10.4324/9780203066348.

[47] Nyanya Browne, Ph.D., , "Lured into Debt: How Payday Loans and Paycheck Apps Exacerbate Financial Struggles in Underserved Communities," Howard Univ. Research Centers (2023), https://coascenters.howard.edu/lured-debt-how-payday-loans-and-paycheck-apps-exacerbate-financial-struggles-underserved

[48] Dan Martinez and Margaret Seikel, "Credit Card Interest Rate Margins at All-Time High," Consumer Financial Protection Bureau (CFPB blog), February 22, 2024, https://www.consumerfinance.gov/about-us/blog/credit-card-interest-rate-margins-at-all-time-high/.

[49] Marjin A.Bolhuis, Judd N. L. Cramer, Karl Oskar Schulz, and Lawrence H. Summers, "The Cost of Money is Part of the Cost of Living: New Evidence on the Consumer Sentiment Anomaly." Working paper 32163. Cambridge, MA: National Bureau of Economic Research (2024).

[50] Pew Charitable Trust, "Payday Lending in America: Who Borrows, Where They Borrow, and Why," July 19, 2012, https://www.pewtrusts.org/en/research-and-analysis/reports/2012/07/19/who-borrows-where-they-borrow-and-why; Pew Charitable Trust, "What Does the Research Say About Payday Loans? Pew expert looks back at 30 years of developments in the field," June 21, 2023, https://www.pewtrusts.org/en/research-and-analysis/articles/2023/06/07/what-does-the-research-say-about-payday-loans.

[51] S. Xie, V. Wenxin Xie, X. Zhang, *Extreme Weather and Low Income Household Finance: Evidence from Payday Loans*, January 8, 2024; https://www.bankofcanada.ca/2024/01/staff-working-paper-2024-1/ (having more extreme temperature days in a month increases payday loan demand, and more extreme heat days in a month leads to deteriorating performances of existing payday loans).

[52] Jennifer Andre, Breno Braga, Kassandra Martinchek, & Signe-Mary McKernan, *The Effects of the State Utility Shutoff Moratoria on Credit Delinquencies during the Covid-19 Pandemic* (January 22, 2024), https://www.sciencedirect.com/science/article/abs/pii/S0148619524000122?dgcid=rss_sd_all#:~:text=We%20find%20that%20residents%20of,debt%20sent%20to%20a%20collector or https://ssrn.com/abstract=4702669 or https://doi.org/10.1016/j.jeconbus.2024.106170.

[53] Final Report of the Low Income Affordability Collaborative, Appendix C, pp. 13 – 14, Docket E-2 Sub 1219, North Carolina Utilities Commission, August 2022.

Furthermore, the data shows that many households have never participated in home energy assistance programs. The next section of this report looks at the households that are disproportionately impacted.

Disproportionately impacted households

Background

The National Consumer Law Center (NCLC) reviewed a sampling of results from the 2020 Residential Energy Consumption Survey regarding energy insecurity in the West Census Region. NCLC reviewed West Census Region data rather than Washington state data because the state-level data sampling was insufficient to produce statistically reliable results in cross-tabulations.

The energy insecurity variables we reviewed included the following:

- Frequency of forgoing necessities to due to home energy bills
- Frequency of keeping home at an unhealthy temperature due to home energy bills
- Frequency of receiving a disconnection notice

NCLC cross-tabulated the variables cited above the following household characteristics:

- Gross household income
- Race of householder
- Housing tenure

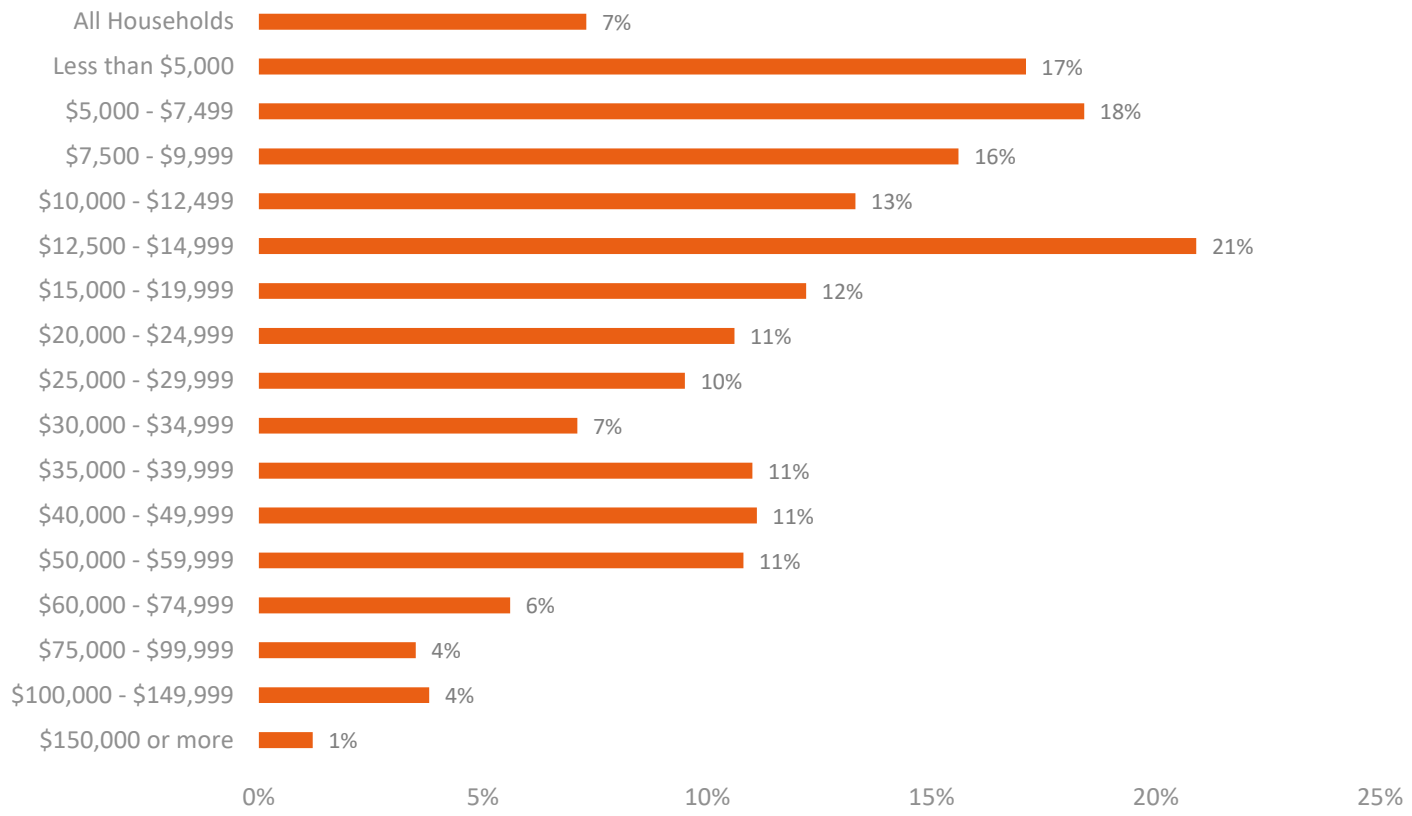
Highlights

- Low-income households in the West Census Region are disproportionately likely to suffer from energy security, such as forgoing basic necessities or receiving a disconnection request
- Black, Indigenous, and people of color experience energy insecurity more frequently than other households in the Western Census Region
- Renters experience energy insecurity more frequently than homeowners in the Western Census Region

Findings

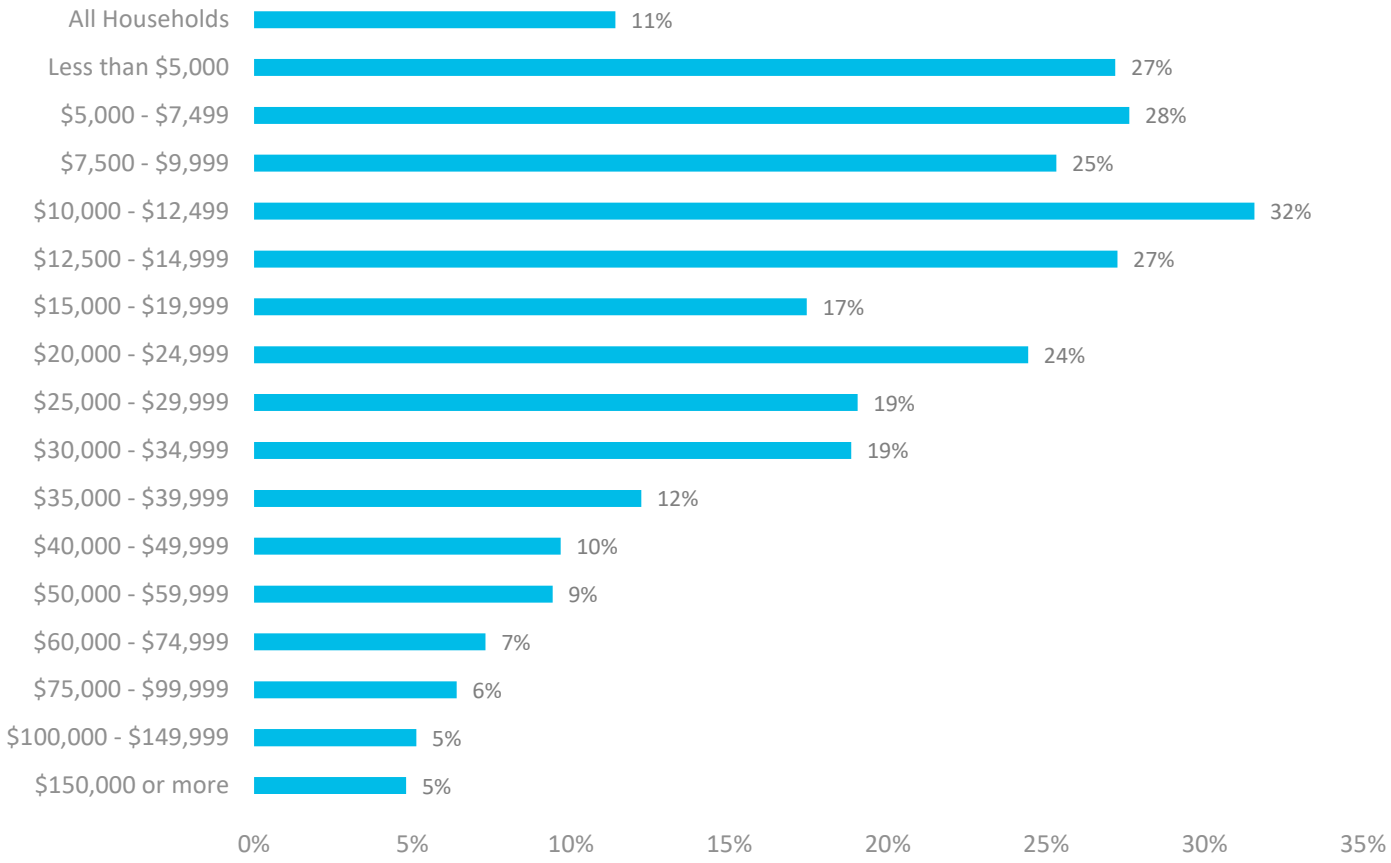
Results of this inquiry, as reflected in Figures 14-21, provide evidence of disparate energy insecurity experience by household income, race and housing tenure. For example, households with income between $12,500 and $14,999 were about four times more likely to receive a disconnection notice and about three times more likely to maintain an unhealthy indoor temperature almost every month or some months than households with income between $60,000 and $74,999.

Figure 14: Frequency of receiving disconnection notice by household income in the West Census Region



Source: 2020 RECS microdata tabulated by National Consumer Law Center

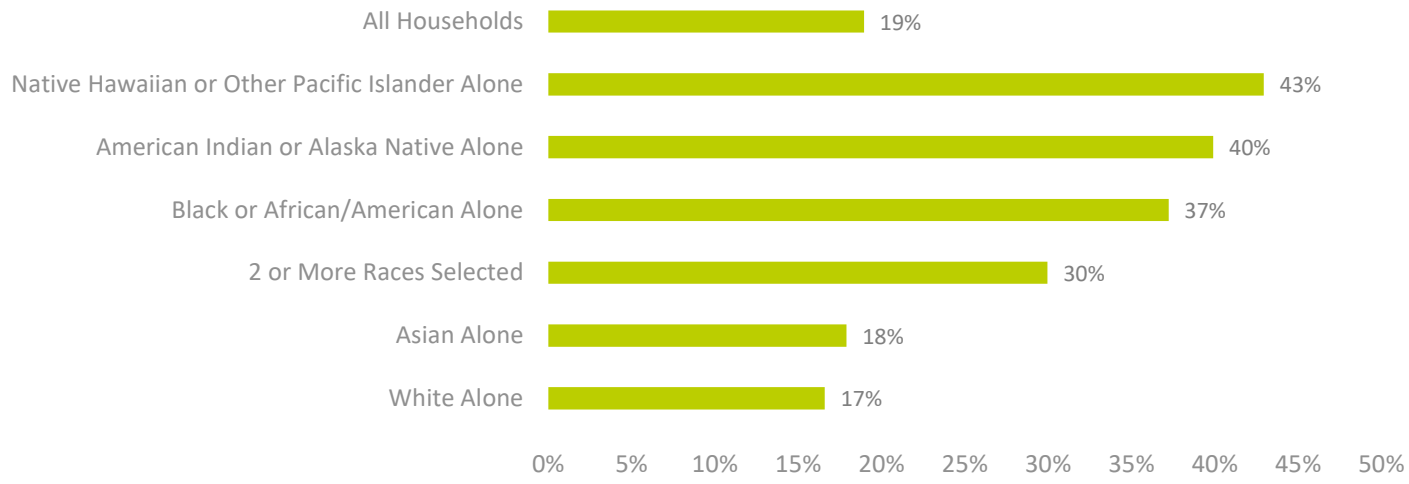
Figure 15: Frequency of maintaining unhealthy indoor temperature due to home energy bills by household income in the West Census Region



Source: 2020 RECS microdata tabulated by National Consumer Law Center

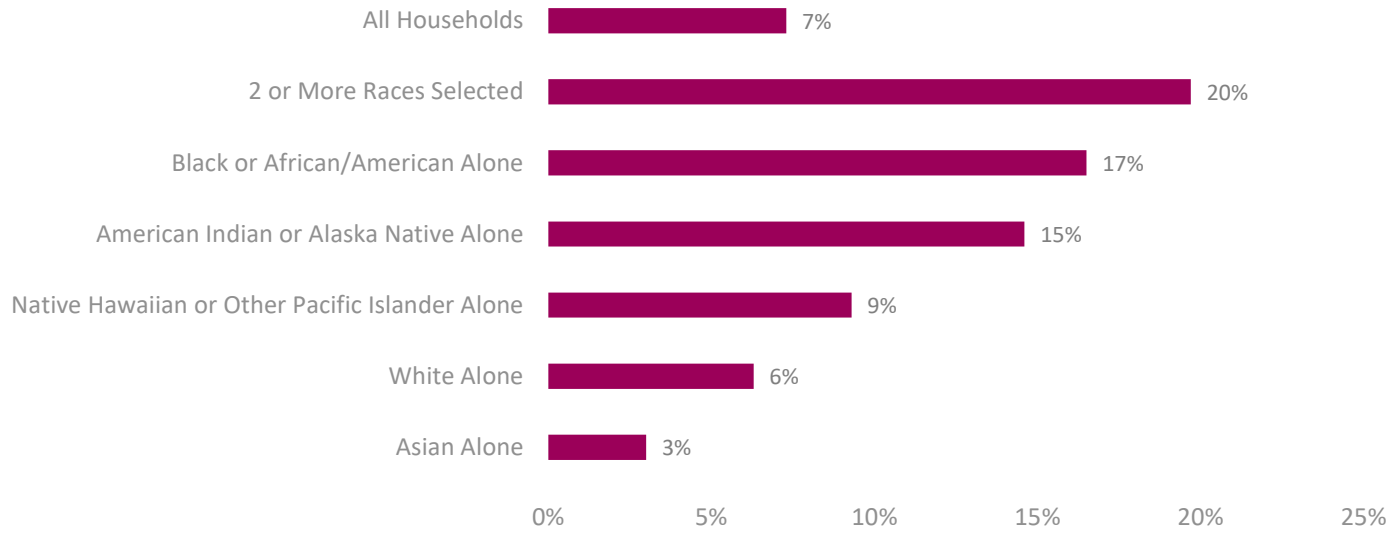
American Indian or Alaskan Native-headed households were about three times more likely to forego necessities almost every month due to home energy bills than white-headed households. Black-headed households were more than twice as likely to receive a disconnection notice as white-headed households.

Figure 16: Frequency of reducing or forgoing basic necessities due to home energy bill by race in West Census Region



Source: 2020 RECS microdata tabulated by National Consumer Law Center

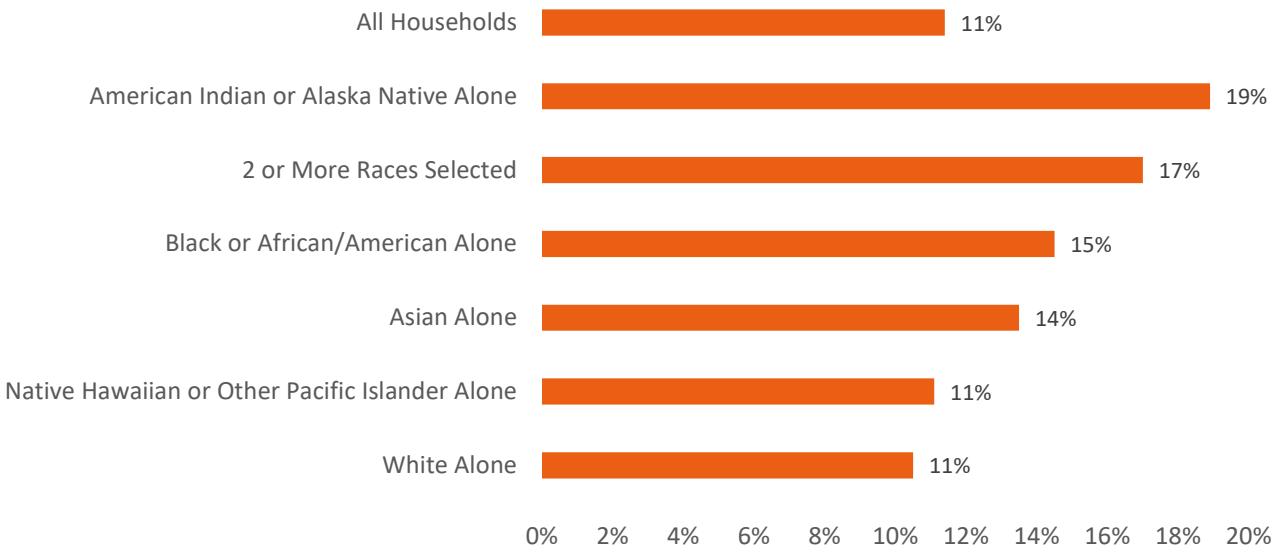
Figure 17: Frequency of receiving a disconnection notice by race in West Census Region



Source: 2020 RECS microdata tabulated by National Consumer Law Center

Results from the 2020 RECS Western Census Region data show that households headed by an American Indian or Alaskan Native person were particularly likely to report maintaining an unhealthy indoor temperature due to high energy bills. Households headed by a respondent of two or more races also reported elevated levels of this key energy insecurity indicator.

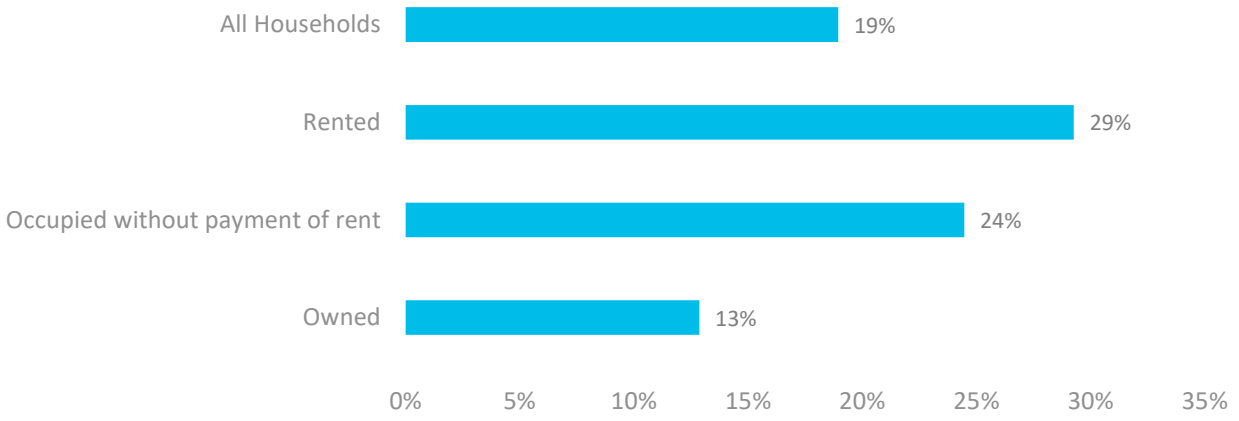
Figure 18: Frequency of keeping home at an unhealthy temperature by race in the West Census Region



Source: 2020 RECS microdata tabulated by National Consumer Law Center

Renter households were more than twice as likely to forego necessities due to home energy bills as homeowner households. Similarly, renters were about twice as likely to maintain unhealthy indoor temperatures as homeowner households.

Figure 19: Frequency of reducing or forgoing basic necessities due to home energy bill by housing tenure in West Census Region

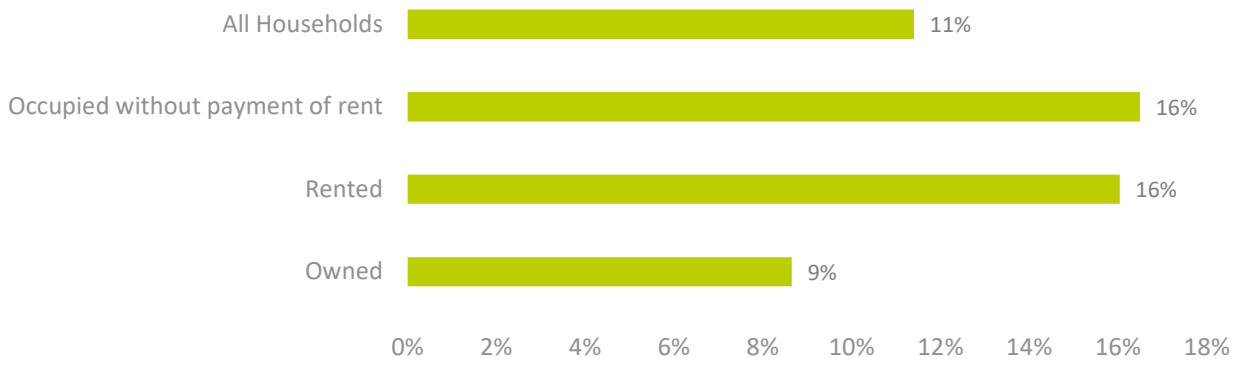


Source: 2020 RECS microdata tabulated by National Consumer Law Center

National and regional data demonstrate that one of the coping mechanisms used by some households in response to unaffordable energy bills is to maintain unhealthy indoor temperatures. This coping mechanism has been linked to serious health consequences.[54]

Examination of the data on housing tenure reveals that respondents living in rental housing or in housing occupied without payment of rent are about twice as likely as owner-occupants to report high bills leading to maintenance of unhealthy indoor temperatures.

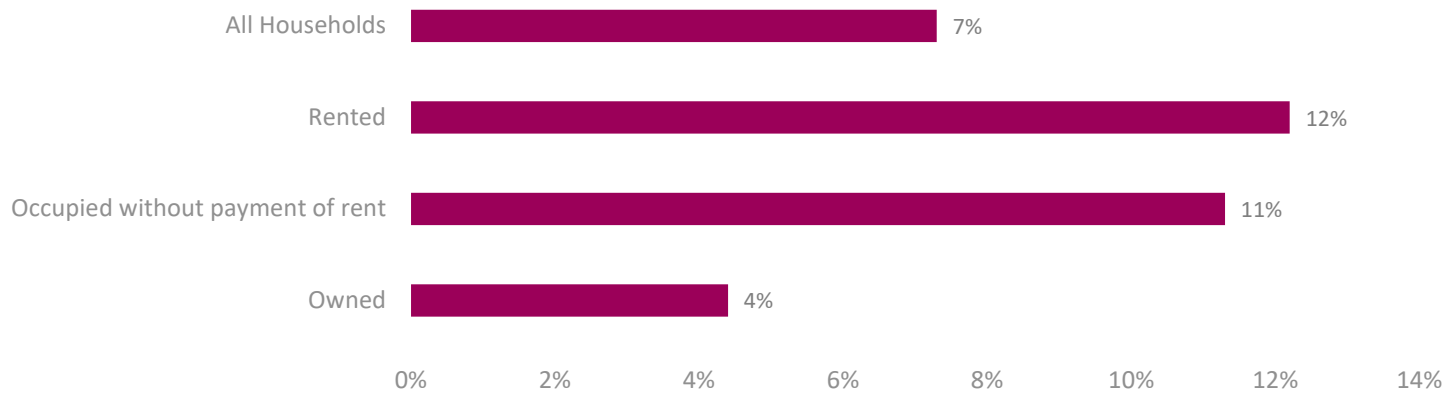
Figure 20: Frequency of keeping home at an unhealthy temperature by housing tenure in the West Census Region



Source: 2020 RECS microdata tabulated by National Consumer Law Center

[54] See, Hernandez, D., "Understanding Energy Insecurity and Why it Matters to Health," Social Science and Medicine, Vol. 167. 2016, pp. 1 - 10.

Figure 21: Frequency of receiving disconnection notice by housing tenure in the West Census Region



Source: 2020 RECS microdata tabulated by National Consumer Law Center

Conclusion

Data from the West Census Region suggests that households comprised of low-income, BIPOC and renters are more likely to experience energy insecurity. While this section looks only at quantitative data about energy insecurity, these numbers point to real human suffering that lands hardest on low-income households, BIPOC communities, and renters. The next section of this report looks at the laws intended to mitigate this suffering, and the gaps in those laws.

Gaps in energy affordability protections for low-income households

Background

RCW 19.405.120 (Sec. 120) addresses the total home energy burden of low-income households and puts the obligation of addressing that burden directly on electric utilities.

There are two main types of electric utilities:
Investor-owned utilities (IOUs), which include Avista Corp, PacifiCorp and Puget Sound Energy (PSE). Investor-owned utilities serve about 44% of residential electric utility customers.

Consumer-owned utilities (COUs), including roughly 24 public utility districts, 17 municipal utilities and 17 cooperatives providing electricity to retail customers. Consumer-owned utilities serve about 56% of residential electric utility customers.

The Utilities and Transportation Commission (UTC or Commission) regulates investor-owned utilities within the state and has broad jurisdiction over its utilities as the economic regulator. The Commission's jurisdiction and authority are enumerated under RCW Title 80.

Consumer-owned utilities have their own locally elected governing boards and are primarily self-regulated under their respective statutory frameworks.

The Legislature has passed a handful of laws governing utility low-income energy assistance that result in a patchwork of programs. Some of the more precise statues only pertain to investor-owned utilities and are enforced by the UTC. These laws and their gaps are detailed below.

Highlights

- The Legislature has enacted energy assistance requirements for all electric utilities under RCW 19.405.120 (Sec. 120) and placed additional requirements on investor-owned utilities under RCW 80.28.068.
- **Washington's current laws** do not ensure universal access to monthly energy bill assistance programs or comparable benefits to similarly situated households served by different utilities.
- **Sec. 120** allows utilities to comply with the law even if they serve few low-income households and make little progress in reducing energy assistance need.
- **Sec. 120** allows inadequately designed, insufficiently funded, inaccessible energy assistance programs unable or unlikely to serve all types of low-income households.
- **RCW 80.28.068(1)** allows the UTC to approve rates, charges, services, and/or physical facilities at a discount, or through grants, for low-income seniors and low-income customers. The statute requires utilities to use reasonable and good faith efforts to seek approval on program design, eligibility, operation, outreach, and funding proposals from its low-income and equity advisory groups. The statute requires consultation with community-based organization to help develop and expedite the programs. It does not set metrics for success, which the UTC sets on an ad-hoc basis. RCW 80.28.068 does not apply to consumer-owned utilities.
- **RCW 80.28.068(2)** allows for approved low-income programs to use means tested public benefits to enroll customers in a low-income discount rate or grant so long as the eligibility criteria for the other program does not exceed the low-income definition set forth by RCW 19.405.020. RCW 80.28.068 does not apply to consumer-owned utilities.

- **RCW 80.28.425** requires investor-owned energy utilities to submit multi-year rate plans to the Commission. Under the multi-year rate plan statute, the Commission must (at minimum) approve low-income assistance programs at double the percentage of the underlying rate increase for each year of the rate plan. When approving a multi-year rate plan, the Commission must approve performance measures that track and assess the utilities' operations in many areas including but not limited to: affordability, rate stability, cost of service, and customer satisfaction and engagement. RCW 80.28.425 does not apply to consumer-owned utilities.

Summary of prevailing statutes

RCW 80.28.068

RCW 80.28.068 was first enacted in 1999 to allow the Utilities and Transportation Commission to approve rate discounts for low-income customers of electric and gas companies. It was subsequently revised in 2009 and most recently in 2021. The law only applies to investor-owned utilities.

RCW 80.28.068 requires investor-owned utilities propose low-income discount rates to the Commission, as well as grants and other low-income assistance programs. Investor-owned utilities must make reasonable and good faith efforts to seek approval of these programs from low-income energy assistance and equity advisory groups. The programs must be delivered in coordination with community action agencies or other community-based organizations, and with streamlined eligibility rules and "substantial outreach and community engagement."

The Utilities and Transportation Commission is key to implementation of RCW 80.28.068. The Utilities and Transportation Commission has extensive powers to convene low-income advocates and utilities to design programs and drive reforms across the three investor-owned utilities.

The law does not apply to consumer-owned utilities, and the reforms at the Utilities and Transportation Commission do not impact low-income households served by consumer-owned utilities.

Relationship with RCW 80.28.425

RCW 80.28.425 requires investor-owned energy utilities to submit multi-year rate plans to the Commission. Under the statute, the Commission must (at minimum) approve low-income assistance programs at double the percentage of the underlying rate increase for each year of the rate plan. Additionally, when approving a multi-year rate plan, the Commission must approve performance measures that track and assess the utilities' operations.

The Commission has created a set of metrics that measure and evaluate IOU assistance programs. Although the metrics are subject to change or revision in the future, the UTC requires IOUs to report the following metrics on a census tract level:

- Arrearages by month
- Percentage of customers in arrears with an AMP
- Average Energy Burden
- Percentage of customer funded assistance funds disbursed
- Number of customers that participate in one or more bill assistance program

RCW 80.28.425 does not apply to consumer-owned utilities.

Gaps in RCW 80.28.068

RCW 80.28.068 includes more specific provisions around bill assistance mechanisms than RCW 19.405.120, but also relies on UTC interpretation and negotiations between low-income advocates and utilities.

Gaps in RCW 80.28.068 include:

- Absence of statutory goals to evaluate program success related to household outcomes, such as program participation rates and reductions in energy burden
- Requirements to conduct regular low-income energy assistance need assessments
- Requirement to offer assistance to households when they sign up for electric or natural gas service
- Requirement that programs meet best practices in human-centered design

RCW 19.405.120 (Sec. 120)

The Legislature in 2019 required electric utilities make programs and funding available by July 31, 2021, and places the obligation of addressing energy assistance need directly on electric utilities. Sec. 120 requires electric utilities provide assistance to low-income households, and to the extent practicable prioritize assistance to low-income households who spend more than 6% of their household income on home heat and power. [55]

Low-income is defined under state law (RCW 19.405.020) and administrative rule (WAC 194-40-030) as household incomes that do not exceed the higher of 80% of area median income or 200% of federal poverty level, adjusted for household size.

Utilities must submit assessments and reports on a biennial basis to Commerce. Utilities decide the methods and metrics used for the assessments. Commerce is then required to aggregate utility reports and provide a summary of utility programs, energy burden, and energy assistance need to the Legislature on a biennial basis.

The Legislature recognized that Sec. 120's requirements may be inadequate and not the right approach, and required Commerce to evaluate a number of additional mechanisms and alternative approaches for assisting household in Sec. 120(6).

Gaps in Sec. 120

While Sec. 120 provides a clear statement of the legislative intent that electric utilities are responsible for making progress in reducing energy burden, the statute does not ensure utility energy assistance programs are well-designed, sufficiently funded, or readily accessible. It does not require continuous data-driven evaluations or assessments, or the co-creation of bill assistance programs with households and local service providers.

Perhaps most important, Sec. 120 does not:

- Ensure universal access to low-income energy monthly bill assistance
- Ensure uniform benefit levels for similarly situated low-income households statewide
- Ensure programs are sufficiently funded to meet energy assistance need
- Require utilities work with tribes and community partners who specialize in serving low-income households
- Require utilities improve the process for households to enroll in monthly bill assistance programs and allow any community partner the ability to assist households

[55] RCW 19.405.120

- Require utilities perform ongoing outreach and enrollment campaigns tailored to historically marginalized groups, or ensure outreach and enrollment campaigns deliberately avoid and proactively address poverty stigmas
- Ensure utilities develop data-driven, evidence-based plans and assessments that align with national best practices and account for local household needs
- Systematically interrogate how the unequal distribution of household experiences might be structured by a household's position within the intersecting fields of race, income, gender, age, disability, and geographical location.
- Measure progress based on meaningful outcomes for low-income households, such as program participation rates and reductions in energy burden

These gaps in policy directly impact low-income households:

- Low-income households do not have universal access to monthly energy bill assistance no matter where they happen to live
- Low-income households do not have access to bill assistance programs with uniform benefit levels
- Low-income households do not have a uniform way to easily enroll in assistance programs
- Low-income households cannot go to any community organization and receive assistance

These gaps may also have impacts on households if utilities are not proactively addressing these areas under other statutes or the direction of their regulator:

- Outreach and enrollment campaigns may not be tailored to historically marginalized groups
- Low-income households may not benefit from programs informed by data-driven plans and assessments, such as low-income needs assessments, that align with national best practices
- Low-income households may not benefit from systematic evaluations of unequal distribution of household experiences might be structured by a household's position within the intersecting fields of race, income, gender, age, disability, and geographical location, or any corresponding programmatic reforms to address identified disparities

RCW 74.38.070

Low-income energy bill assistance first appeared in statute in 1979. The law grants permissive authority for public utility districts and municipalities to provide reduced rates for low-income seniors. Low-income disabled citizens were added to the statute in 1988. The statute received its last significant revision in 1998, when it was broadened to include all low-income citizens.

RCW 74.38. 070 requires any reduction in rates granted in any manner to low-income senior citizens or other low-income citizens be uniformly extended to low-income senior citizens or other low-income citizens in the service area.

Gaps in RCW 74.38.070

RCW 74.38.070 does not require utilities offer discounts to low-income households, and it says nothing about the design, administration, or evaluation of program beyond non-discrimination.

Conclusion

The Legislature has granted utilities explicit authority to pursue low-income energy assistance programs to low-income households for 45 years, and six years ago the Legislature mandated utilities offer programs and funding to low-income households. Investor-owned utilities have the most specific requirements, and benefit from a supportive regulator in the Utilities and Transportation Commission.

Built into each of these laws is the fragmentation of home energy assistance by utility service provider. The utility-by-utility approach to energy bill assistance does not address the fundamental challenges households and service providers highlighted in Commerce's listening sessions, surveys, and local service provider workshops. Indeed, while the laws have grown increasingly specific, the statutes still have significant gaps. None of the statutes provide universal access, uniform benefit levels, or human-centered, user-friendly monthly bill discounts for low-income households statewide, and none set statutory goals or mandates for program participation.

Table M: Summary of Washington's Principal Low-Income Energy Bill Assistance Laws

RCW	The law says	The law does not require utilities
74.38.070 (1979, 1980, 1988, 1990, 1998, 2002)	Public utility districts and municipalities may provide assistance to low-income seniors and other low-income households on a non-discriminatory basis	Make programs and funding available and accessible for low-income households Limit utility programs to seniors or customers with disabilities
19.405.120 (2019)	The law addresses the full energy burden of low-income households and puts the obligation of addressing energy assistance need directly on electric utilities Electric utilities must make energy assistance programs and funding available to households Electric utilities must submit data and assessments of their programs to Commerce on a biennial basis Commerce submits a summary report to Legislature on a biennial basis	Ensure low-income households have universal access to monthly bill assistance Ensure low-income households at one utility receive a comparable level of assistance to households of another utility Prioritize funding to households with greater assistance need Track progress based on program participation rates and reductions in energy burden Conduct third-party low-income needs assessments that examine disproportionate outcomes on historically marginalized groups Establish statutory goals related to household outcomes, such as program participation rates and reductions in energy burden Ensure rural utilities with a disproportionate share of low-income households can meet energy assistance need without rate hikes Provide assistance in the preferred languages of households beyond written translation Extend assistance to households when they sign up for electric or natural gas service
80.28.068 (2021)	Requires investor-owned utilities propose low-income discount rates to the UTC, after seeking input from advisory groups.	Apply to consumer-owned utilities Achieve statutory goals specific to household outcomes, such as program participation rates

RCW	The law says	The law does not require utilities
	Programs must delivered with community action agencies or other community organizations, and with streamlined eligibility rules	Conduct third party low-income energy assistance need assessments Extend assistance to households when they sign up for electric or natural gas service Provide service in the preferred languages of households

Washington's patchwork of utility bill assistance programs

Background

Electric utility energy assistance programs, and their low program participation rates, reflect the current utility-by-utility approach under Washington law.

Electric utility monthly energy bill assistance programs represent a patchwork of utility energy assistance programs with many holes where crucial programs and funding are absent. This patchwork has remained relatively the same since utility reported programs and expected programmatic changes in Commerce's 2023 Legislative Report.

Layered over the patchwork of utility programs is a federal block grant program, the Low-Income Housing Energy Assistance Program (LIHEAP), and a few relatively small state programs that offer limited assistance to low-income households. Additional one-time funding from the federal government and Legislature has helped reduce outstanding arrearages for low-income households in the wake of the COVID-19 pandemic.

Somewhat related, the Legislature in 2024 provided a one-time allocation of $150 million from the Climate Commitment Account to help low-income and moderate-income households with the clean energy transition. Funds will be distributed as one-time $200 payments to households by September 15, 2024.[56] Notably, the funds were appropriated to "help with the costs of the clean energy transition," including transportation costs, and could be distributed to middle income households (150% of AMI). The funds were not allocated for the expressed purpose of addressing the home energy burden of low-income households.

Highlights

- Many low-income households do not have monthly low-income bill assistance programs available to them, because consumer-owned utilities often adopt income eligibility requirements below state law and administrative rule; require households meet additional eligibility criteria; or choose to offer no monthly bill assistance program at all
- The inconsistences across the patchwork of utility energy assistance programs include varied application requirements and often limited enrollment processes, incomplete information about eligibility and application requirements, and other barriers to understanding and enrolling in utility low-income energy bill assistance programs
- Many consumer-owned utility bill assistance programs depend on unreliable funding sources that are insufficient to serve low-income households and meet energy assistance need
- Investor-owned utilities have reformed their programs yet program participation rates continue to lag significantly behind statewide programs with similar eligibility criteria, such as the Supplemental Nutrition Assistance Program, which may reflect the inherent difficulties of having utilities administer assistance programs at scale

[56] Engrossed Substitute Senate Bill 5950, Sec. 130 (2024)

Survey of utility programs in March 2024

In March 2024, Commerce surveyed utility webpages to assess the availability and accessibility of utility low-income energy bill assistance programs, and to better understand the availability and accessibility of programs from an individual household perspective.[57]

Methodology

Commerce surveyed the webpages of Washington's roughly 50 electric utilities for low-income energy bill assistance program information and followed relevant hyperlinks posted on utility webpages to view all readily available program information.

Great care was taken to thoroughly document this information to minimize potential data collection errors. Commerce collected data from utility webpages in an Excel workbook and preserved the webpages and program information in PDFs.[58] Any information that was not readily available was labeled as "unknown."

This survey includes important information, such as future utility plans or program participation rates, which will be available in Commerce's Biennial Low-Income Energy Assistance Legislative Report (Sec. 120(6)), expected before January 1, 2025.

Key findings of 2024 survey of utility webpages

- Nearly all utility low-income energy bill assistance programs do not match state law (RCW 19.405.020) and administrative rule (WAC 194-40-030).
- Most programs funded through utility operations have non-income eligibility criteria that deny many low-income households access to monthly bill assistance.
- Low-income households in one utility service area may receive significantly different benefits if they were located in another utility service area.
- Many of the programs have unreliable funding sources insufficient to meet all energy assistance need.
- Income eligibility criteria listed on utility webpages was found to be in some cases inaccurate and outdated.
- Low-income households must navigate fragmented and vastly different enrollment processes depending on their electric utility.
- Low-income households interested in applying for assistance may not find information on their utility's website about how long it may take from application to receive of benefits.

[57] RCW 19.405.120 (Sec.120) requires utilities submit data on their programs on a biennial basis. Commerce last published data on utility assistance programs in 2023. Utilities were required to submit data for the reporting years 2022 and 2023 by April 1, 2024. That data will be aggregated, cleaned, and published before Jan. 1, 2025. It will be made available on Commerce's Clean Energy Transformation (CETA) Energy Assistance webpage at that time.
[58] RCW 19.405.120: Energy assistance for low-income households. (wa.gov)

Income eligibility requirements that do not match state law and administrative rule

Many utilities use eligibility criteria that fall below the higher of 80% of the Area Median Income (AMI) or 200% of the Federal Poverty Level (FPL).[59]

By setting income requirements below state law (RCW 19.405.020) and administrative rule (WAC 194-40-030), low-income households that should be eligible for energy assistance under state law and administrative rule are denied access to utility assistance programs.

Washington's investor-owned electric utilities, under the direction of the Utilities and Transportation Commission, have deliberately matched the eligibility requirements set in state law (RCW 19.405.020) and administrative rule (WAC 194-40-030).

Commerce observed in its survey of utility webpages that Mason County PUD No 3 was the only consumer-owned utility with a program funded through utility operations that has eligibility criteria that matches state law and administrative rules in March 2024.[60] Okanogan Electric Cooperative and Benton PUD No. 1 offer donation programs that match state law and administrative rule.

Not matching state law and administrative rule is not simply a small utility issue

Washington's large consumer-owned utilities do not match state law (RCW 19.405.020) and administrative rule (WAC 194-40-030) requirements for income eligibility.

Use of income eligibility criteria that do not match state law or administrative rule may make a considerable number of low-income households ineligible for assistance.

Tacoma Power's Bill Credit Assistance program uses 300% FPL for determining income eligibility. For a one person household, 300% FPL would be $45,165. Tacoma's other bill assistance program is available to seniors who fall below 225% FPL, which is $33,885 for a one person household. In comparison, 80% AMI for a one-person household in Pierce County is $60,200. That's a difference of $15,035 and $26,315, respectively.

Snohomish Public Utility District No 1 only uses 200% FPL, although AMI is significantly higher in Snohomish County. Clark Public Utility District offers no monthly bill discount program at all.[61]

Seattle City Light uses 70% of state-median income (SMI).[62] Table N: Seattle Median Income versus State Median Income Comparisons shows the comparison between AMI and SMI income limits in Washington and the city of Seattle.

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[59] 88% of programs use more restrictive eligibility criteria than the state law (See Appendix J: Survey of utility programs and webpages)
[60] See Appendix J: Survey of utility programs and webpages
[61] Roughly 9% (5 out of 58) of Washington utilities do not offer bill assistance programs
[62] State Median Income does not match the income eligibility metrics in the state law (RCW 19.405.020)

Table N: Seattle Area Median Income versus State Median Income Comparisons

Household/Family Size	80% AMI (2023)	70% SMI (2023)	Difference
1	$70,650	$44,268	$26,382
2	$80,750	$57,900	$22,850
3	$90,850	$71,520	$19,330
4	$100,900	$85,140	$15,760
5	$109,000	$98,760	$10,240
6	$117,050	$112,392	$4,658

The difference in AMI and SMI reflects the fact that the cost of living in Seattle is significantly higher than the rest of the state.

Using statewide median income does not account for this difference in the cost of living, which deems low-income households that would be eligible under state law (RCW 19.405.020) and administrative rule (WAC 194-40-030) as ineligible under Seattle City Light's income eligibility requirements.

Low-income households may not be able to access programs because consumer-owned utilities have adopted additional eligibility requirements that rule out many low-income households from accessing monthly low-income energy assistance

Another way of restricting access to assistance is to require eligibility criteria unrelated to income. Many utilities limit their bill assistance programs to senior citizens or individuals with disabilities.[63] One program includes veterans[64] and another program includes veterans, widows and widowers.[65]

Limiting low-income energy assistance programs to a few households based on non-income criteria excludes other households. For instance, if a single mother and a child happens to be served by a utility with restricted programs, she would not be able to receive month-to-month energy bill assistance for her and her child, even if their household's energy assistance need is greater than that of someone deemed eligible for the program.

Restricting access to a subset of low-income household does not comply with the requirement in Sec. 120, which requires that utilities make programs and funding available to low-income households, and to the extent practicable prioritize funds to households who spend more than 6% of their household income on home energy bills. There is no language in the statute that allows utilities to limit access to the programs to only certain groups of low-income households and meet Sec. 120 requirements for programs and funding to be available to low-income households.

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[63] Over half (59%) of utility-funded bill assistance programs exclusively serve certain low-income groups such as seniors or individuals with disabilities
[64] Cowlitz County PUD No 1 and Benton County PUD No 1
[65] Benton County PUD No 1

Investor-owned utilities have programs open to all low-income households.

Low-income households likely encounter many challenging application and enrollment requirements to utility energy bill assistance programs

Low-income households experience vastly different enrollment processes across utilities,[66] and low-income households and community organizations face significant uncertainty about whether low-income bill assistance programs exist and how to access them.[67] The exception is community action agencies, which administer other energy-related social services.

An example of limited enrollment may be best illustrated by City of Chewelah. The Chewelah Electric Department only offers a residents five possible days to apply for its utility bill assistance program. Online applications can be submitted at 11 a.m. on Oct. 2, Feb. 1, and June 3. Applications can be taken over the phone at 11 a.m. on Dec. 1 and April 1. The city webpage notes that after submitting an application, a household may wait up to 90 days for an appointment at the local community action agency.[68]

Low-income households may have very different utility bill assistance programs offered to them with very different benefit amounts

Utility funded programs have the following bill design makeup:

- 51% of programs provide a monthly discount rate
- 18% of programs provide a lump sum bill credit monthly
- 12% of programs provide a lump sum bill credit yearly
- 12% of programs did not provide publicly available information on the bill assistance mechanism or assistance amount
- Investor-owned utilities are required to offer bill discounts and have adopted tiered bill discounts based on the recommendation of their low-income advisory groups and at the direction of the Utilities and Transportation Commission.

It is generally unclear how donation-based provide assistance:

- 77% of donation-based programs did not provide publicly available information on the bill assistance mechanism or assistance amount
- 22% of donation-based programs provide a lump sum bill credit yearly

Programs can offer significantly different assistance levels across utilities

Commerce's survey of utility webpages found flat monthly discount rates range from 20 to 60%. Monthly lump-sum bill credits range from $9.55 to $55.51. Yearly lump-sum bill credits range from $75 to $1,320.[69]

[66] See Appendix J: Survey of utility programs and webpages
[67] See Appendix G: Household surveys and Appendix H: Community organization listening sessions summary
[68] See Appendix for Webpage analysis
[69] See Appendix J: Survey of utility programs and webpages

Low-income households in some parts of the state may only receive assistance during certain times of the year

Less prominent ways of limiting assistance to low-income households occurs through placing seasonal restrictions on assistance.[70]

Households may struggle to pay their energy bills at any time during the year, and increased cooling needs during hotter and hotter summers raise significant questions about the merits of limiting bill assistance to winter months.

Low-income households may only be able to get one-time assistance insufficient to meet energy assistance need

Low-income households served by consumer-owned utilities may only have donation programs, which have been shown to be unreliable, insufficient, and do not provide a source of sustained energy burden reduction for low-income households.[71]

Pierce County case study

Pierce County provides a microcosm of the state when it comes to monthly low-income energy assistance programs. As shown in Table O: Pierce County Overview. The county has 12 utilities. Only one of the utilities, Puget Sound Energy, Inc., offers a monthly low-income energy bill assistance open to all low-income households as defined under state law and administrative rule. The other utilities tend to run limited donation programs, assistance programs that restrict eligibility to only certain persons, such as seniors and disabled, or programs with income eligibility criteria that fall below state law and administrative rule. Low-income households in Pierce County may have vastly different experiences accessing energy bill assistance based solely on where they happen to live in Pierce County. Many have access to no monthly bill assistance programs at all.

Table O: Pierce County Overview

Utilities	Energy services	Approximate service territory (in Pierce County)	Approximate number of residential customers	Number of low-income bill assistance programs, including donations	Number of low-income bill assistance programs w/o donations	Number of low-income energy bill assistance programs w/o non-income eligibility restrictions	Number of low-income energy bill assistance programs that match state law and administrative rule	Number of low-income monthly energy bill assistance programs that match state law and administrative rule
Tacoma Power	Electricity	Tacoma	183,000	2	2	1	0	0

[70] Lewis County PUD 1
[71] Low-Income Energy Assistance 2023 Legislative Report

Utilities	Energy services	Approximate service territory (in Pierce County)	Approximate number of residential customers	Number of low-income bill assistance programs, including donations	Number of low-income bill assistance programs w/o donations	Number of low-income energy bill assistance programs w/o non-income eligibility restrictions	Number of low-income energy bill assistance programs that match state law and administrative rule	Number of low-income monthly energy bill assistance programs that match state law and administrative rule
Peninsula Light Company	Electricity	Western Pierce County, including University Place	30,000	3	2	0	0	0
Puget Sound Energy, Inc.	Electricity, natural gas	Northwestern parts of Tacoma, including Puyallup and Tacoma	118,162 electric customers 159,428 gas customers	3	2	2	1	1
Lakeview Light and Power	Electricity	Greater Lakewood area, including south Tacoma and city of Lakewood	2,824	1	0	0	0	0
Ohop Mutual Light Co.	Electricity	Rural parts of Pierce County	4,808	2	1	0	0	0
Town of Eatonville	Electricity	Eatonville	1,274*	0	0	0	0	0
Parkland Light & Water Co	Electricity	Parkland	4,604*	1	0	0	0	0
Elmhurst Mutual Power & Light Co	Electricity	Greater areas around central Pierce County, including Spanaway	15,043*	1	0	0	0	0

Utilities	Energy services	Approximate service territory (in Pierce County)	Approximate number of residential customers	Number of low-income bill assistance programs, including donations	Number of low-income bill assistance programs w/o donations	Number of low-income energy bill assistance programs w/o non-income eligibility restrictions	Number of low-income energy bill assistance programs that match state law and administrative rule	Number of low-income monthly energy bill assistance programs that match state law and administrative rule
Steilacoom Public Works	Electricity	City of Steilacoom	2,904*	1	1	0	0	0
Town of Ruston Utility Dept.	Electricity	Town of Ruston	631*	0	0	0	0	0
City of Milton	Electricity	City of Milton	3,550*	1	1	0	0	0
Tanner Electric Cooperative	Electricity	Anderson Island	835*	1	0	0	0	0

Challenges utilities encounter implementing energy assistance laws

Utilities and utility staff face a number of challenges when implementing bill assistance programs. Some of these challenges can be mitigated or addressed, but many are inherent in the utility-by-utility approach to low-income energy assistance. Both these individual utility and structural challenges within the utility-by-utility approach contribute to program outcomes for low-income households. Indeed, while investor-owned utilities have adopted more extensive programs and seen boosts in program participation, they continue to struggle with relatively low-program participation rates.

The rural utility dilemma

Many of the rural counties with disproportionately burdened populations are served by relatively small electric utilities.[72] For example, Ferry County is served by Ferry County PUD No 1 — one of the state's smallest utilities. It has 0.8% of the residential customers and 1.7% of the revenues of Seattle City Light. Ferry County PUD No 1's service territory is one of the most low-income and energy burdened parts of the state.[73]

It may be difficult for Ferry County PUD No 1 to provide ratepayer-funded energy assistance sufficient to address the energy burden of its low-income households without rate hikes, because of its high proportion of low-income, energy-burdened customers compared to larger utilities, such as Seattle City Light. Fully addressing the energy burden of low-income customers for utilities with a disproportionate share of low-income customers could result in other customers becoming energy burdened.

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[72] Low-Income Energy Assistance 2023 Legislative Report
[73] Form EIA-860 detailed data with previous form data (EIA-860A/860B)

It is important to note that the rural utility dilemma extends beyond simply funding needs of households but also the costs to stand up and deliver efficient, equitable, and quality services for low-income households. These costs may be significant, and it may be highly inefficient from a statewide perspective to require these utilities perform the necessary elements for efficient, equitable, and quality programs for households.

Addressing energy burden from fuel sources other than what is provided by the utility

Sec. 120 intends to address the total household energy burden and puts the obligation of addressing that energy burden directly on electric utilities.[74] Electric utilities may struggle to cover the costs and deliver immediate assistance for households using non-electric power sources, such as natural gas, propane, and wood.

Utilities often struggle to gather and track household demographic, energy burden, and assistance need data in their service territory

Utilities have traditionally tracked their physical infrastructure and revenues — not household demographics, energy burden, or energy assistance need. Their lack of tracking important information for administering low-income programs may be because many of their service territories overlap, making it difficult to track this information.

There are ways to gather and track demographic information, energy burden, and assistance need. Only a handful of utilities have invested in this information.[75] Commerce is unaware of any utility using information from statewide low-income energy assistance programs to help inform their programs and program development.

Utilities generally do not conduct income verification procedures

Many utilities do not want to conduct income verification for eligible households, because they do not want to retain personal demographic information on their customers. Instead of doing income verification in-house, most utilities send households to community action agencies.

Investor-owned electric utilities recently started conducting income verification in-house alongside community action agencies.

Policy slippage

An immense number of staff and local decision-makers are needed to implement low-income monthly bill assistance programs for over 50 utilities. Most utilities have not implemented Sec. 120 requirements to offer two energy assistance programs open to low-income households as defined in state law and administrative rule, with exception of the investor-owned utilities, which are required to do so by the Utilities and Transportation Commission.

The slippage in implementation means state law and administrative rules that are specific are not being implemented, or may not be being implemented effectively, at the local level. Any effort to reform utility programs from the state level will require extensive coordination by more than 50 administrators and local

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[74] RCW 19.405.020; RCW 19.405.120
[75] Low-Income Energy Assistance 2023 Legislative Report

decision makers, no matter the policy; even then, it is not guaranteed that statutes and administrative rules will be uniformly implemented.

Conclusion

Washington's patchwork of programs reflects the inconsistencies and broken communications that arise when fragmenting the design and administration of essential social services across more than fifty different entities that often have overlapping service territories. This outcome matches the challenges identified by households and local social services providers of getting resources to households in need.

Even investor-owned utilities with their relatively more robust programs continue to struggle with getting their program participation rates near that of statewide programs, which may be the result of the fragmentation of programs and breakdown of communications about what assistance is available to low-income households across utility providers overall.

Alternatives under a utility-by-utility approach

Background

Utilities asked Commerce to evaluate several alternative options to a statewide approach as part of this proviso. While these alternative options do not align with the legislative requirement to recommend a design of a statewide energy program to address the energy burden and provide access to energy assistance for all low-income households through a universally accessible statewide program, Commerce is providing an analysis of these options for the Legislature to be able to compare a statewide program to alternative policy approaches.

Each of the alternative approaches tries to fix a discrete and individual problem by adding more layers or functionality to Washington's patchwork of programs or pushing more funding through existing programs. In reality, the reasons why utility programs have low program participation rates are more nuanced, complex, and sometimes structural than these options suggest.

Perhaps more importantly, additional policy layers and funding approaches under a utility-by-utility approach ignore structural inequalities that influence outcomes for low-income households in ways that are sometimes hard to see: Who has access to access human-centered, user-friendly assistance and who does not.

A statewide data clearinghouse

A "statewide data clearinghouse" is the idea that utilities simply need the state to identify low-income households for utilities. Proponents of this approach suggest the state could provide lists of households enrolled in state programs, such as the Supplemental Nutrition Assistance Program (SNAP), or federal income information, such as through information submitted to the IRS or disclosed to Medicaid.

There are many federal and state laws and administrative statutes that limit access to household income information and prohibit sharing lists of households enrolled in many state and federal programs unless the data is being shared to a program directly related to administration of the specific program or, in some cases, for implementation of programs that directly relate to purposes and goals of the programs.[76] For instance, lists of SNAP participants can be shared under certain circumstance for implementation of local food assistance programs.

There is a long history of Washington agencies, companies, and local governments seeking access to state and federal low-income information from DSHS. Commerce, DSHS, and Commerce's IT consultants spent many months exploring potential opportunities of sharing lists of households with utilities.

DSHS found that federal statutory barriers prevent data sharing. DSHS is seeking a legal waiver from the federal government to share SNAP data with Commerce. It remains unclear whether that data could be then passed to investor-owned or consumer-owned utilities.

Providing lists of households to utilities would not provide universal access or uniform benefit levels to low-income households. It would not provide a uniform way to enroll in utility programs, fix fragmented broken communications, or provide comprehensive multilingual services and enrollment campaigns. It would not address funding issues for utilities with a disproportionate share of low-income households, and may exacerbate them. A data clearinghouse would not help households not enrolled in statewide programs.

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[76] Appendix L: Data sharing to streamline enrollment

Additional funding for utility low-income energy assistance programs

Another option was for the Legislature to pump more funding through the existing patchwork of utility programs. Unfortunately, simply pushing more funding through existing system of energy assistance programs would not address current bottlenecks of having roughly 50 utilities offering programs with varying and often limited program eligibility criteria, enrollment processes, multilingual services, comprehensive enrollment campaigns, and programmatic evaluations and other quality controls.

The state could choose to condition funding based on programmatic reforms and deliver funding only to utilities unable to meet energy assistance targets with customer revenues.

This idea comes from Chapter 188, Laws of 2021, which the Washington Legislature passed in 2021. It permits the UTC to approve, disapprove, or approve with modifications energy assistance proposals of the following types:

> Any proposal to recover from ratepayers up to five percent of the total revenue requirement for each year of a multiyear rate plan for tariffs that reduce the energy burden of low-income residential customers including, but not limited to: (a) bill assistance programs; or (b) one or more special rates. For any multiyear rate plan approved under this section resulting in a rate increase, the commission must approve an increase in the amount of low-income bill assistance to take effect in each year of the rate plan where there is a rate increase. At a minimum, the amount of such low-income assistance increase must be equal to double the percentage increase, if any, in the residential base rates approved for each year of the rate plan. The commission may approve a larger increase to low-income bill assistance based on an appropriate record.

The Legislature could build on this law and provide state funding only if a utility's energy assistance expenditures exceed the 5% threshold. Amounts over the threshold could be returned to utilities as a credit against the public utility tax. Like the system benefits charge, it could be an effective mechanism to help utilities in areas of the state with high energy burden provide the necessary assistance to their customers.

The 5% threshold appears to be substantially higher than current low-income assistance funding levels, so significant increases in utility spending could occur without triggering the tax credit provision. As noted elsewhere, low-income customers who do not participate in the program and non-low-income households could see rate changes. Streamlined enrollment and improved outreach and community engagement could increase program participation and reduce the overall number of non-participating low-income households.

Additional funding for the Low-Income Home Energy Assistance Program (LIHEAP)

The Legislature could choose to provide more funding to LIHEAP, but that would not address the restrictive eligibility requirements of the program set by the federal government. The most notable restriction is the income eligibility criteria of 150% FPL, which is $30,660 for a household of two. LIHEAP also includes citizenship requirements, which further restricts availability.

Providing additional funding for LIHEAP would not address ongoing energy burden, because LIHEAP is an annual grant program. Once the grant is spent, energy bill assistance is no longer available through the program until the household navigates LIHEAP's enrollment process the following year.[77]

Additional funding for the Heat and Eat Program

The Heat and Eat program is a special energy assistance program provides up to twenty dollars and one cent in federal low income home energy assistance program (LIHEAP) benefits to households receiving both SNAP and LIHEAP. It may be possible for the amount of assistance through the Heat and Eat program to be increased; however, LIHEAP serves relatively few households in the state and therefore this mechanism would not reach many low-income households.

Additional funding for the Public Utility Tax Credit for Home Energy Assistance

Electric and gas utilities can request a public utility tax credit for energy assistance they give to low-income customers. The statute caps the total credit at $2.5 million per year. The tax credit is set to incentivize electric and gas utility companies to provide additional energy assistance to low-income customers. Although tax preference utilities report increasing amounts of energy assistance, the credit is likely of limited influence relative to statutory requirements under Sec. 120 and RCW 80.28.068. Based on these observations, increasing the public utility tax credit is likely to have negligible effects on program participation rates and reductions in energy assistance need.

Continuing Washington Families Clean Energy Credits Program

In the 2023-2025 supplemental operating budget, Commerce was instructed to start up the Washington Families Clean Energy Credits Grant Program, funded by the climate commitment account.

The Washington Families Clean Energy Credits Grant Program dedicates $150 million to assist low- and moderate-income households with the clean energy transition. This initiative will offer bill credits of $200 per household to eligible residential customers through their electric utility provider. The Department of Commerce will distribute grants to all utility companies in Washington, enabling them to pass on $200 bill credits to customer accounts by September 15, 2024.

Utilities must first prioritize bill credits for customers at or below 80 percent area median income (AMI) and if funds remain, may expand bill credits for customers up to 150 percent of area median income (AMI). Customers residing in overburdened communities and vulnerable populations as defined under RCW 70A.02.010 will receive additional prioritization. This includes individuals who have participated in programs like the Low-Income Housing Energy Assistance Program (LIHEAP), utility payment plans, or other ratepayer-funded assistance programs. Utilities may also qualify customers through self-attestation.

The Washington Families Clean Energy Credits Program does not offer monthly low-income energy bill assistance to households, and the $200 is not sufficient to address the energy assistance needs of most energy burdened low-income households nor is it targeted to households in greatest need. The program has income eligibility criteria that include households that are not low-income and the credit is intended for transportation and other energy costs, and the assistance is a one-time flat amount.

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[77] Washington State Low Income Home Energy Assistance Program (LIHEAP)

Implementation of the Washington Families Clean Energy Credits Program will provide insights for how a statewide monthly program may identify and deliver benefits to low-income households. However, the program is fundamentally not designed to provide universal access to low-income monthly energy bill assistance or address energy assistance need.

Additional statutory requirements

Another option is to tighten and expand the requirements on utility programs.

A comprehensive approach may include requiring utilities to:

- Offer monthly bill assistance programs for low-income households funded through utility operations
- Offer streamlined eligibility requirements, including self-attestation with limited documentation
- Perform biennial energy assistance needs assessments conducted through a third-party contractor with expertise in equity and environmental justice
- Conduct ongoing data-driven, evidence-based programmatic evaluations
- Track program participation rates in their bill assistance programs and disparities in program performance across demographic groups on an ongoing basis
- Partner with rural organizations in their service territory to expand program enrollment for historically marginalized communities
- Partner with directly Black, indigenous, and people of color organizations in their service territory to expand program enrollment for these historically marginalized communities
- Provide in-person translation services and multilingual materials for all languages reasonably believed to be in the service territory
- Provide an online portal and in-person options for enrolling in bill assistance programs
- Provide low-income households with information about federal, state, and local energy efficiency services and where they can apply for them
- Provide information to low-income households about where they can find additional low-income services beyond energy assistance
- Co-develop and seek approval for monthly low-income bill assistance program designs, eligibility, operation, outreach and funding from low-income households and community organizations that specialize in serving low-income households, including households and organizations from Black, indigenous, and people of color communities.

There would need to be program standards, reporting methodologies and requirements established to ensure consistent program implementation across utilities.

This policy approach would retain the utility-by-utility approach to energy assistance. If history holds, it would not avoid policy slippage absent significant investment in legislative and programmatic oversight from the state. It would not address funding issues in areas of the state with a disproportionate share of low-income households and also be highly inefficient compared to a statewide energy assistance program. It also would not address broken communication processes across overlapping utility service territories.

Commerce conducting outreach on behalf of utilities

Some utilities suggested Commerce conduct outreach and enrollment campaigns on behalf of utilities. The variety of utility programs, eligibility requirements, processes for applications and enrollment, benefit levels and amounts, ad-hoc utility programmatic changes, and other utility-by-utility considerations mean it would be implausible to create consistent messaging for low-income households. Moreover, Commerce does not have

staff to track and implement robust outreach and enrollment campaigns for multiple low-income energy assistance programs, and it would be extremely inefficient to do so.

Conclusion

The alternative approaches to patch gaps and address issues that stem from administering low-income monthly energy bill assistance programs across 50+ utilities do not address the fragmentation and fundamental inconsistencies and inefficiencies of administering 50+ monthly low-income energy bill assistance programs.

Table P: Policy layering and supplementary funding approaches

Augmented utility-by-utility approaches	Idea	The approach does not address
Data sharing with state agencies	The state provides utilities with information on households enrolled in statewide low-income programs	Federal prohibitions on sharing data from statewide programs with significant household participation, such as SNAP Universal access to monthly bill assistance for low-income households Disparate benefit amounts for low-income households served by different utilities Fragmented, restrictive eligibility requirements and enrollment processes for low-income households Fragmented, broken communication processes between utilities, community service organizations, and households Slippage in implementation of statutes, limiting household access to critical assistance and potentially affecting life outcomes Ability of rural utilities with disproportionate share of low-income customers to develop and fund programs without rate hikes
Commerce conduct outreach for each of Washington's 50+ utilities	Commerce conducts outreach and community engagement for electric utilities	Same as above Complexity of communicating details of 50+ disparate utility programs, and sending households and service providers to look for resources that may not exist Funding to support outreach on behalf of utilities
Additional statutory requirements	The Legislature addresses policy gaps on a utility-by-utility basis through legislation	Gaps depend on comprehensiveness and specificity of the law Inefficiency, slippage, and communication challenges with implementing 50+ monthly energy bill assistance programs Ability of rural utilities with disproportionate share of low-income to develop and fund programs without rate hikes
Supplementary funding for utility programs	The Legislature funds utility assistance programs	Universal access to monthly bill assistance for low-income households

Augmented utility-by-utility approaches	Idea	The approach does not address
		Inefficiency, slippage, and communication challenges with implementing 50+ assistance programs Disparate benefit amounts for low-income households served by different utilities Reduces money available for other state programs
Supplementary funding for the Low-Income Home Energy Assistance Program	The Legislature provides more funding for LIHEAP	Restrictive eligibility requirements set in federal statute Meeting home energy costs after the awarded grant is exhausted Limited enrollment opportunities
Supplementary Funding for the Heat and Eat Program	The Legislature provides more funding for the Heat and Eat Program	Households who are not enrolled in LIHEAP Universal access to monthly energy bill assistance Targeting benefits to meet home energy assistance need Variations in household energy consumption Ability of rural utilities with disproportionate share of low-income customers to develop and fund programs without rate hikes
Continuing Washington Families Clean Energy Credits Program	The Legislature continues to provide $200 to households annually for transportation and home energy expenses	Federal prohibitions on sharing data from statewide programs with significant household participation, such as SNAP Universal access to monthly energy bill assistance Targeting benefits to meet home energy assistance need Variations in household energy consumption Ability of rural utilities with disproportionate share of low-income customers to develop and fund programs without rate hikes
Energy Rebates	The Legislature provides rebates for home energy costs on an annual or monthly basis	Federal prohibitions on sharing data from statewide programs with significant household participation, such as SNAP Variations in household energy consumption Targeting benefits to meet home energy assistance need If rebates are provided on an annual basis, the program would not provide universal access to monthly bill assistance If rebates are provided on an annual basis, administrative costs could be exceptionally high to process payments on a monthly basis

Conclusion

The Legislature first requested Commerce examine a statewide approach under RCW 19.405.120 (Sec. 120), and subsequently asked Commerce under Chapter 475, Laws 2023 to recommend a design for a statewide program.

The recommended program design satisfies the Legislature's request for the agency to make recommendations on a design for a statewide energy assistance program to address the energy burden and provide access to energy assistance for low-income households. It also addresses key considerations the Legislature asked Commerce consider in its recommended design.[78] It is based on the input received over the past year from hundreds of individuals from community providers, utilities, state agencies, environmental justice advocates, national experts, and households.

At its core, the recommended program design removes barriers households confront under a fragmented utility-by-utility approach to bill assistance, and expands opportunities for low-income households to access low-income energy assistance no matter where they happen to live and in a manner responsive to their unique needs and preferences. The program also reduces the inefficiencies of administering 50+ separate monthly bill assistance programs across Washington's electric utilities.

[78] 5187-S.sl.pdf (wa.gov)

Appendix A: Definitions

Consumer-owned utility (COU) means a municipal electric utility formed under Title 35 RCW, a public utility district formed under Title 54 RCW, an irrigation district formed under Chapter 87.03 RCW, a cooperative formed under Chapter 23.86 RCW, or a mutual corporation or association formed under Chapter 24.06 RCW, that is engaged in the business of distributing electricity to more than one retail electric customer in the state.[79]

Energy assistance need means the amount of assistance necessary to achieve an energy burden at or below 6% for utility customers.[80]

Energy burden means the share of annual household income used to pay annual home energy bills.[81] It is limited to residential expenses, and includes any fuel source for energy, such as electricity, natural gas, propane, heating oil, and wood. It does not include transportation-related energy expenses, such as gasoline or electric vehicle charging.

A household is energy burdened by their home energy bills when their bills exceed 6% of their gross income. This calculation reflects that shelter costs should not exceed 30% of income, and utility costs should not exceed 20% of shelter costs. Therefore, an affordable energy burden should be at or below 6% of household income (30% x 20% = 6%).

Investor-owned utility (IOU) means a company owned by investors that meets the definition of "corporation" in RCW 80.04.010 and is engaged in distributing electricity to more than one retail electric customer in the state.[82]

Low-income means household incomes that do not exceed the higher of 80% of area median income (AMI) or 200% of federal poverty level (FPL) adjusted for household size.[83]

[79] RCW 19.405.020: Definitions. (wa.gov)
[80] WAC 194-40-030:
[81] RCW 19.405.020: Definitions. (wa.gov)
[82] Ibid.
[83] WAC 194-40-030:

Appendix B: the Low-Income Energy Affordability Data (LEAD) Tool

The LEAD Tool was developed by the U.S. Department of Energy (DOE) and National Renewable Energy Lab (NREL) as part of the Clean Energy for Low-Income Communities Accelerator (CELICA), a U.S. Department of Energy Better Buildings Initiative Accelerator, aimed to lower energy bills for low-income communities through a two-year voluntary partnership between DOE and state and local governments.

The LEAD Tool uses the U.S. Census Bureau's 2020 American Community Service data (ACS) data with microdata samples from the survey (2016-2020).

Like all U.S. Census Bureau data, the data in the LEAD Tool is self-reported by households. This includes the energy cost data, which is collected for the month the survey was conducted. Household energy costs are then extrapolated over the course of a year. DOE calibrates the energy cost data using electric utility and natural gas utility survey data submitted by utilities to U.S. Energy Information Administration. This fixes averages across geographic areas to match roughly utility reported data. For instance, electricity expenditures by households across Census tracts in a utility service area would be roughly equal to the average utility revenue by customer.

The tool contains energy burden data at the national, state, county, tribal, and city levels. The ACS is household reported data. However, as a survey, not all households are sampled. Household types are grouped together and energy expenditures are assumed to be the same within a group.

Income information is provided as a percentage of the area median income (AMI), state median income (SMI), and federal poverty level (FPL). The tool provides the number of occupied housing units and energy expenditures by:

- Tenure (renter or owner)
- Year of first construction
- Number of units in the building
- Housing unit primary heat type

Strengths and limitations

The DOE LEAD Tool provides the only publicly available resource on household energy burden. It is the only comprehensive resource to look at energy burden by Census tracts and the above dimensions.

The primary limitation of the DOE LEAD Tool is that it relies on self-reported data. Self-reported data is subject to error. A household may incorrectly identify the primary heat type of their building, for instance reporting utility gas instead of bottled gas.

Self-reported data may also overestimate or underestimate true energy costs. Extrapolating one month of energy costs over a year introduces additional uncertainty into the dataset. Households tend to use more energy in winter and summer months to heat and cool their homes, than in spring and fall. Extrapolating household energy data collected in winter and summer months may overestimate household costs, while data

collected in spring and fall may underestimate a household's annual energy costs. Bias from non-responsive households are addressed through the U.S. Census Bureau's methodology.[84]

DOE calibrates the energy price data to align it with energy price data collected through surveys of electric utilities (Survey Form 861) and natural gas utilities (Survey Form 176) to mitigate against potential errors in the ACS data. Non-responsive households are likely corrected by the Census Bureau as part of their methodology.

Perhaps importantly, some households do not pay energy costs directly – like an apartment building with a shared boiler. The actual per unit costs may differ from a similar household that pays energy costs directly.

Many utilities reported difficulties working with the LEAD Tool data because Census tracts do not align with utility service area boundaries. A utility serving the same Census tract served by other utilities cannot determine the energy burden associated with its customers from the customers of the other utilities. They must estimate it.

Utilities know the actual bills of their customers. They know arrearages, late payments and disconnection notices, conservation potential, energy assistance expenditures and other program data. Customer demographic data is available through third parties. County assessors have information on buildings and the state has customer information about households served through state programs, such as the Low-Income Heat Assistance Program (LIHEAP).[85]

This information has been used by some utilities to build household-level data dashboards for their service territories. These efforts have been limited to the three IOUs and a half-dozen COUs.

[84] An Overview of Addressing Nonresponse Bias in the American Community Survey During the COVID-19 Pandemic Using Administrative Data (census.gov)
[85] Energy Equity · Empower Dataworks

Appendix C: The Residential Energy Consumption Survey

Survey Background

The Residential Energy Consumption Survey (RECS) is the only nationwide source of energy related characteristics, consumption, and expenditures for U.S. homes.

EIA administers the Residential Energy Consumption Survey (RECS) to a nationally representative sample of housing units. Traditionally, specially trained interviewers collect energy characteristics on the housing unit, usage patterns, and household demographics. For the 2020 survey cycle, EIA used Web and mail forms to collect detailed information on household energy characteristics. This information is combined with data from energy suppliers to these homes to estimate energy costs and usage for heating, cooling, appliances and other end uses — information critical to meeting future energy demand and improving efficiency and building design.

First conducted in 1978, the fifteenth RECS collected data from nearly 18,500 households in housing units statistically selected to represent the 123.5 million housing units that are occupied as a primary residence. Data from the 2020 RECS are tabulated by geography and for particularly characteristics, such as housing unit type and income, that are of particular interest to energy analysis.

The results of each RECS include data tables, a microdata file, and a series of reports. Data tables are generally organized across two headings; "Household Characteristics" and "Consumption & Expenditures." See RECS data tables.

The RECS and many of the EIA supplier surveys are integral ingredients for some of EIA's more comprehensive data products and reports, such as the Annual Energy Outlook (AEO) and Monthly Energy Review (MER). These products allow for broader comparisons across sectors, as well as projections of future consumption trends.

RECS began in 1978 as an annual survey. The 2020 RECS is the fifteenth iteration of the survey.[86]

86

Appendix D: RCW 19.405.120 (2019)

Energy assistance for low-income households.

1) It is the intent of the legislature to demonstrate progress toward making energy assistance funds available to low-income households consistent with the policies identified in this section.

2) An electric utility must make programs and funding available for energy assistance to low-income households by July 31, 2021. Each utility must demonstrate progress in providing energy assistance pursuant to the assessment and plans in subsection (4) of this section. To the extent practicable, priority must be given to low-income households with a higher energy burden.

3) Beginning July 31, 2020, the department must collect and aggregate data estimating the energy burden and energy assistance need and reported energy assistance for each electric utility, in order to improve agency and utility efforts to serve low-income households with energy assistance. The department must update the aggregated data on a biennial basis, make it publicly accessible on its internet website and, to the extent practicable, include geographic attributes.

    a) The aggregated data published by the department must include, but is not limited to:

        i) The estimated number and demographic characteristics of households served by energy assistance for each utility and the dollar value of the assistance;

        ii) The estimated level of energy burden and energy assistance need among customers served, accounting for household income and other drivers of energy burden;

        iii) Housing characteristics including housing type, home vintage, and fuel types; and

        iv) Energy efficiency potential.

    b) Each utility must disclose information to the department for use under this subsection, including:

        i) The amount and type of energy assistance and the number and type of households, if applicable, served for programs administered by the utility;

        ii) The amount of money passed through to third parties that administer energy assistance programs; and

        iii) Subject to availability, any other information related to the utility's low-income assistance programs that is requested by the department.

    c) The information required by (b) of this subsection must be from the electric utility's most recent completed budget period and in a form, timeline, and manner as prescribed by the department.

4)

    a) In addition to the requirements under subsection (3) of this section, each electric utility must submit biennially to the department an assessment of:

i) The programs and mechanisms used by the utility to reduce energy burden and the effectiveness of those programs and mechanisms in both short-term and sustained energy burden reductions;

ii) The outreach strategies used to encourage participation of eligible households, including consultation with community-based organizations and Indian tribes as appropriate, and comprehensive enrollment campaigns that are linguistically and culturally appropriate to the customers they serve in vulnerable populations; and

iii) A cumulative assessment of previous funding levels for energy assistance compared to the funding levels needed to meet: (A) Sixty percent of the current energy assistance need, or increasing energy assistance by fifteen percent over the amount provided in 2018, whichever is greater, by 2030; and

b) ninety percent of the current energy assistance need by 2050.

(a) The assessment required in (a) of this subsection must include a plan to improve the effectiveness of the assessed mechanisms and strategies toward meeting the energy assistance need.

5) A consumer-owned utility may enter into an agreement with a public university, community-based organization, or joint operating agency organized under chapter 43.52 RCW to aggregate the disclosures required in this section and submit the assessment required in subsections (3) and (4) of this section.

6)

a) The department must submit a biennial report to the legislature that:

i) Aggregates information into a statewide summary of energy assistance programs, energy burden, and energy assistance need;

ii) Identifies and quantifies current expenditures on low-income energy assistance; and

iii) Evaluates the effectiveness of additional optimal mechanisms for energy assistance including, but not limited to, customer rates, a low-income specific discount, system benefits charges, and public and private funds.

b) The department must also assess mechanisms to prioritize energy assistance towards low-income households with a higher energy burden.

7) Nothing in this section may be construed to restrict the rate-making authority of the commission or the governing body of a consumer-owned utility as otherwise provided by law.

Appendix E: RCW 19.405.120 (Sec. 120) Analysis

Background

The Legislature made each of Washington's roughly 50 electric utilities responsible for addressing the household energy burden of its customers under Sec. 120, while recognizing that additional mechanisms may be necessary to address household energy burden.

This appendix underscores the gaps in Sec. 120, and how these gaps have direct impacts on low-income households. This section focuses exclusively on Sec. 120 and does not comment on RCW 80.28.068, which applies additional requirements to investor-owned utilities. A discussion of RCW 80.28.068 is included in the body of this report.

Key findings

Sec. 120 does not do the following:

- Ensure universal access to low-income energy monthly bill assistance
- Ensure uniform benefit levels for similarly situated low-income households statewide
- Ensure programs are sufficiently funded to meet energy assistance need
- Require utilities work with tribes and community partners who specialize in serving low-income households
- Require utilities improve the process for households to enroll in monthly bill assistance programs and allow any community partner the ability to assist households
- Require utilities perform ongoing outreach and enrollment campaigns tailored to historically marginalized groups, or ensure outreach and enrollment campaigns deliberately avoid and proactively address poverty stigmas
- Ensure utilities develop data-driven, evidence-based plans and assessments that align with national best practices and account for local household needs
- Systematically interrogate how the unequal distribution of household experiences might be structured by a household's position within the intersecting fields of race, income, gender, age, disability, and geographical location.
- Measure progress based on meaningful outcomes for low-income households, such as program participation rates and reductions in energy burden

Findings

While Sec. 120 provides a clear statement of the legislative intent for electric utilities to make progress in reducing energy burden, the statute does not ensure utility energy assistance programs are well-designed, sufficiently funded, or readily accessible by low-income householders across the state. Moreover, the statute does not require data-driven, evidence-based assessments, continuous program evaluations, or the co-creation of bill assistance programs with households and communities with the intention of serving all low-income households and meeting energy assistance need.

There are policy flaws in low-income household protections under Sec. 120, and there are inherent inefficiencies in energy assistance programs when they are administered by over 50 different entities. While some aspects of program design can be fixed through state law, others, such as slippage in utility implementation of state law, will likely persist under a utility-by-utility approach.

Both programmatic and structural failures could be more uniformly addressed under a statewide approach to the benefit of low-income households statewide.

Analysis

RCW 19.405.120(2)

An electric utility must make programs and funding available for energy assistance to low-income households by July 31, 2021.

Summary of the statute

Each of Washington's nearly 50 utilities subject to Sec. 120 must make two or more programs available for energy assistance to low-income households as defined in RCW 19.405.020(25) and WAC 194-40-030. Utilities were required to make programs available by July 31, 2021.

Noteworthy gaps in the statute

Sec. 120 allows utilities to comply with the law using programs incapable of meeting energy assistance need. This lack of specificity differs from the Legislature's directive under RCW 80.28.068, which requires investor-owned utilities offer at least one bill assistance program funded through utility operations.

Sec. 120 neither enables low-income households the ability to enroll themselves in utility bill assistance programs nor provides the opportunity for households to receive in-person help with bill assistance program enrollment from any local community organization of their choosing.

Sec. 120 does not specify that households be able to enroll in a program year round or that program benefits be available year round.

Policy impacts on low-income households

Low-income households may not have realistic energy assistance options to meet their energy assistance need. Below are a handful of examples of programs that meet the requirements of Sec. 120, but are incapable of addressing the total energy burden of households.

- Donation-based programs rely on donations, which have been shown to be unreliable and insufficient to meet energy assistance need.
- One-time waivers of customer account fees by design do not address a household's ongoing energy assistance needs.
- Energy efficiency programs do not address the total energy burden of low-income households. Energy efficiency programs often require significant investments upfront, which may be too expensive for low-income households to participate in them. Renters may also not have access to energy efficiency programs, because changes to rental units require the consent of a landlord and renters often do not want to invest in properties they do not own.

RCW 19.405.120(2) continued

Each utility must demonstrate progress in providing energy assistance pursuant to the assessment and plans in subsection (4) of this section.

Summary of the statute

Each of Washington's roughly 50 utilities must make progress in making funds available to low-income households based on their own assessments and plans.

Noteworthy gaps in the statute

Currently, each utility defines progress based on their own written assessments and plans—with the notable exception of the cumulative funding assessments in subsection 4(a)(iii). There are no assessment or planning criteria to ensure increases program participation or reductions in energy burden, and no requirement that plans and assessments be developed with low-income households or community partners that specialize in serving low-income households—in line with national best practices for public participation and program design.

Utility plans and assessments under Sec. 120(2) and the data collection that occurs under Sec. 120(3) separates many crucial aspects of data collection on energy assistance need from program implementation unless utilities decide to develop data resources in-house.

Policy impacts on low-income households

Data-driven plans and assessments of programs are crucial for monitoring program performance and closing gaps between policy intentions and real-world outcomes for low-income households is vague on what is required in utility assessments and plans, and there is no requirement for programs to be informed by the expertise and lived experiences of low-income households and community organizations in a manner consistent with national best practices. The result are suboptimal policy evaluations and missed opportunities for program improvements, which have downstream effects on programmatic outcomes for low-income households, whether it be low participation rates or unaddressed energy burden.

The bifurcated data collection process between Commerce and utilities further impedes efforts to translate data on low-income energy assistance need and program outcomes into programmatic changes that improve program participation and reductions in energy burden for low-income households.

RCW 19.405.120(2) continued

To the extent practicable, priority must be given to low-income households with a higher energy burden

Summary of the statute

Programs available to low-income households under Sec.120 must prioritize assistance to households with higher energy burden to the extent practicable.

Noteworthy gaps in the statute

Sec. 120 does not explicitly require programs be designed to help households in greatest energy assistance need even though there are plenty of practicable program designs utilities could adopt to target funds to low-income households in greatest need. For instance, a utility could use a tiered bill assistance program based on income. The amount of benefits may be calculated for each income tier based on an approximate amount of funding needed to bring household energy expenses to 6% of household income. Avista, Puget Sound Energy, and PacifiCorp utilize this approach for their customers per regulatory requirements set by the Utilities and Transportation Commission.

Policy impacts on low-income households

The ambiguity in program design in Sec. 120 means low-income households in most need may not receive sufficient funding to meet their need, while other low-income households may receive more assistance than needed to eliminate their energy burden. Some households may have no monthly utility bill assistance programs available to them at all.

RCW 19.405.120(3)

Beginning July 31, 2020, the department must collect and aggregate data estimating the energy burden and energy assistance need and reported energy assistance for each electric utility, in order to improve agency and utility efforts to serve low-income households with energy assistance. The department must update the aggregated data on a biennial basis, make it publicly accessible on its internet website and, to the extent practicable, include geographic attributes.

a) The aggregated data published by the department must include, but is not limited to:
    i) The estimated number and demographic characteristics of households served by energy assistance for each utility and the dollar value of the assistance;
    ii) The estimated level of energy burden and energy assistance need among customers served, accounting for household income and other drivers of energy burden;
    iii) Housing characteristics including housing type, home vintage, and fuel types; and
    iv) Energy efficiency potential.

Summary of the statute

Commerce must collect and aggregate data and post it on its webpage on a biennial basis. To the extent practicable, the data must include geographic attributes.

Noteworthy gaps in the statute

Sec. 120 does not require real-time, data-driven analysis to inform ongoing program performance to improve programs and outcomes for low-income households.

While there are many practicable ways for utilities to use geospatial data to improve their programs, most do not use geospatial data. When they do, they often use unreliable third party data, rather than comparisons of their programs with actual data on low-income household participation in state programs with similar eligibility criteria.

There is no standardization or integration of data tools across utilities to ensure household need from multiple fuel sources are being addressed when households are served by multiple fuels and have different service providers.

Policy impacts on low-income households

Low-income households may not be served or may be insufficiently served by utility assistance programs, because programmatic evaluations and quality controls are absent or not sufficiently embedded in utility programs. Rigorous program evaluations and quality controls help programs meet the energy assistance needs of households.

RCW 19.405.120(3)(b) and (c)

Each utility must disclose information to the department for use under this subsection, including:

v) The amount and type of energy assistance and the number and type of households, if applicable, served for programs administered by the utility;
vi) The amount of money passed through to third parties that administer energy assistance programs; and
vii) Subject to availability, any other information related to the utility's low-income assistance programs that is requested by the department.

b) Refer to (c).
c) The information required by (b) of this subsection must be from the electric utility's most recent completed budget period and in a form, timeline, and manner as prescribed by the department.

Summary of the statute

Utilities are required to disclose information on a biennial basis about the amount and type of assistance provided to households. They must also provide how much money is provided to third parties that administer energy assistance programs, and any other available information requested by Commerce related to a utility's low-income energy assistance programs.

Noteworthy gaps in the statute

The law does not require utilities conduct their own ongoing data-driven, evidence based programmatic evaluations between biennial reporting periods.

Policy impacts on low-income households

Ongoing reviews of program performance are often infrequent and result in significant slippage in program performance and ensuring compliance with affordability protections for low-income households.

RCW 19.405.120(4)(a)(i)

In addition to the requirements under subsection (3) of this section, each electric utility must submit biennially to the department an assessment of:

i) The programs and mechanisms used by the utility to reduce energy burden and the effectiveness of those programs and mechanisms in both short-term and sustained energy burden reductions

Summary of the statute

Utilities must assess their programs and mechanisms for how effective they are in both addressing "short-term" and "sustained energy burden reductions."

Noteworthy gaps in the statute

Sec. 120 leaves it up to utilities to define what is meant by programs and mechanisms, and for utilities to determine methods for evaluating whether programs and mechanisms are addressing "short-term" and "sustained" energy burden reductions, leading many utilities to use rules of thumb in the evaluation of the effectiveness of their programs for short-term and sustained reductions in energy burden.

Policy impacts on low-income households

The vagueness of Sec. 120 and lack of requirements for utilities to conduct data-driven, evidence-based evaluations of whether their programs are successfully meeting short-term and sustained energy burden needs of low-income households means low-income households are not benefitting from potential program improvements that could be revealed through more qualitatively and quantitatively rigorous assessments of whether certain bill assistance designs are more tailored to addressing short-term or sustained energy burden reductions.

RCW 19.405.120(4)(a)(ii)

Each electric utility must submit biennially to the department an assessment of:

ii) The outreach strategies used to encourage participation of eligible households, including consultation with community-based organizations and Indian tribes as appropriate, and comprehensive enrollment campaigns that are linguistically and culturally appropriate to the customers they serve in vulnerable populations

Summary of the statute

This requirement says utilities must look at their past outreach strategies and submit an assessment of their outreach and enrollment strategies.

Noteworthy gaps in the statute

The statute alludes to, but does not specifically require utilities consult with community-based organizations or tribes. Similarly, it does not require utilities conduct comprehensive enrollment campaigns that are linguistically and culturally appropriate to the customers they serve in vulnerable populations.

There are no assessment methodologies or metrics in statute.

There is nothing in Sec. 120 that ensures programs, plans, or assessments are developed with low-income households and community organizations that specialize in serving low-income households.

Policy impacts on low-income households

Low-income households may not be aware of utility programs, because utilities are not working with all of the community partners in their service territory to increase awareness and accessibility of their programs.

Multilingual households and those with little or no English proficiency may not be able to access services or find someone who can walk them through the program in the language the household is most comfortable speaking. They may also be missed in any utility outreach efforts that are not linguistically or culturally appropriate for them.

A lack of data on outreach and enrollment campaigns means there is no way to assess what is going well and what is not with each program's outreach and enrollment strategies.

Low-income households and the community organizations that serve them do not have a way of providing input into program designs to ensure outreach and enrollment campaigns suit low-income households.

RCW 19.405.120(4)(a)(iii)

Each electric utility must submit biennially to the department an assessment of:

A cumulative assessment of previous funding levels for energy assistance compared to the funding levels needed to meet: (A) Sixty percent of the current energy assistance need, or increasing energy assistance by fifteen percent over the amount provided in 2018, whichever is greater, by 2030; and (B) ninety percent of the current energy assistance need by 2050

Summary of the statute

Utilities must look at their year-to-year spending since 2018 and compare that spending to what is needed to meet 60% of current energy assistance need by 2030 or increase spending by 15% over the amount provided in 2018, whichever is greater. They must also look at the funding levels needed to meet 90% of current energy assistance need by 2050.

Noteworthy gaps in the statute

Utilities are not required to reach the funding assessment levels in Sec. 120.

The statute is vague on whether or how quickly it expects utilities to reach the 2030 and 2050 funding levels expected to meet energy assistance need.

The statute allows uneven progress across the state on increasing low-income program funding.

The statute measures an input, funding, and does not measure outcomes for households, such as program participation rates or annual reductions in energy assistance need.

There is nothing in the statute that ensures programs, plans, or assessments are developed with low-income households and community organizations that provide low-income services.

Policy impacts on low-income households

Program funding and programmatic funding assessments do not make a difference to low-income households if programs are not realistically available to low-income households or program participation rates are drastically low.

RCW 19.405.120(4)(b)

The assessment required in (a) of this subsection must include a plan to improve the effectiveness of the assessed mechanisms and strategies toward meeting the energy assistance need.

Summary of the statute

Utilities must make a plan for improving their low-income energy assistance programs and outreach strategies and enrollment campaigns toward meeting energy assistance need.

Noteworthy gaps in the statute

The requirement to “improve the effectiveness” is vague and lacks specificity.

It is unclear at what pace utilities need to act in reducing energy assistance need.

The statute does not specify a uniform methodology for developing a plan that accounts for the desires of low-income households and system constraints.

The plans for improving mechanisms and strategies do not need to align with national best practices.

The plans for improving mechanisms and strategies do not need to be comprehensive in their approach to addressing the needs of Washington households.

There is nothing in the statute that ensures programs, plans, or assessments are developed with low-income households and community organizations that provide low-income services.

Policy impacts on low-income households

Utility plans can lack quantitative and qualitative rigor and not meet the needs of their communities, setting up another two years of small or no changes in program improvements.

RCW 19.405.120(5)

A consumer-owned utility may enter into an agreement with a public university, community-based organization, or joint operating agency organized under chapter 43.52 RCW to aggregate the disclosures required in this section and submit the assessment required in subsections (3) and (4) of this section.

Summary of the statute

The Legislature provides explicit authority to consumer-owned utilities may find other entities specified in statute to assist them in performing the data gathering, assessments, and plans required under the law.

Noteworthy gaps in the statute

There is nothing in the statute that requires utilities or other entities prepare assessments and plans that align with national best practices and are conducted in a uniform manner with a consistent methodology.

Policy impacts on low-income households

Uneven and inconsistent data collection and varying quality in assessments and plans can lead to substantially different outcomes for low-income households.

Appendix F: Centering lived experiences

Background

This appendix provides a summary of the methodology used by Commerce and the Greater Good Studio to center lived experiences. This methodological summary is adapted from a presentation originally produced by the Greater Good Studio and that has been formatted into the Washington State Department of Commerce branded template. The presentation is available on Commerce's webpage.

Through this study, we aimed to learn directly from households about the importance of energy access and home energy costs, and understand their experiences navigating other low-income programs and bill assistance. Household listening sessions prioritized human-centered design methods such as deep listening, storytelling prompts, and hands-on activities to further explore barriers and opportunities directly with households.

Project scope and limitations

This project was scoped to be one component of a larger body of work exploring the potential for an energy assistance program. A summary of meeting participants is provided below:

- 15 households
- Seattle-Tacoma metro area
- Identified as low-income
- Racially diverse
- English speaking
- Experience with different assistance programs

While we learned a lot from these households, future work should include rural regions and linguistically diverse households. Commerce conducted surveys in rural regions and among linguistically diverse households

Centering lived experience

People closest to challenges are experts in their own needs and experiences.

Services meant to provide assistance to underserved members of our communities are often developed with little input by those most affected - program participants. By centering lived experience, we shift that dynamic and design interventions that are more inclusive and effective in making a meaningful difference.

Listening sessions

We engaged in three group listening sessions with low-income households. We explored experiences managing household needs and expenses, and navigating different assistance programs. Reflective activities prompted storytelling and better understanding of household perspectives.

First, we asked households to rank budget priorities by level of importance. Then, we mapped supportive and unsupportive features of assistance programs to examine what worked and what didn't.

How we process data and honor experiences

During research, we collaborate with people who have lived expertise to understand their stories in their own words.

We engage intentionally with people closest to the focus area to learn directly from them. We code each quote, story, or observation shared as its own data point, in the participant's words. Our process carefully considers and preserves each individual's lived experience to find themes across the group and develop key insights.

Sorting and combining data themes

We grouped data points to identify early themes across listening sessions. Then we looked for relationships between themes to surface deeper learnings and key insights.

Conclusion

Too often the programs designed to serve low-income households without consideration of their lived experience or expertise. The methodology used in this report offers a different approach rooted in human-centered design and that puts the needs of low-income households front and centered in discussions about the very programs intended to serve them.

Appendix G: Household surveys

Executive summary

What are the primary reasons you are enrolled or may want to enroll in an energy assistance program?

"I asked and was told there are no programs - I skip my medicine to pay my bills"
— Survey participant

"Retired, fixed income, need to make my dollars stretch"
— Survey participant

"Don't get much on disability, can hardly afford basics as is"
— Survey participant

"I have had fires and floods and other disasters and I have run out of money. I had no insurance as every insurance place applied said I live too far away for them to cover."
— Survey participant

"I am new to America and I need help with electricity"
— Survey participant

"Energy Assistance program helps me to save money for other electrical expenses as a disabled person"
— Survey participant

What would you recommend the state do to maximize participation in a potential statewide monthly low-income energy bill assistance program?

“Be available. The systems in place create more barriers”
— Survey participant

"I believe the more people that hear about the program the more will ultimately join. Advertisement in every form should maximize that"
— Survey participant

"Make it easier to sign up. We've had folks being told to all sign up at 11 am and by 11:02 the slots are full"
— Survey participant

“More people who speak Spanish. Not so many requirements - Mas personas que hablan espanol. No tantos requisites”
— Survey participant

“More people who can help you in Spanish. Longer the period to be able to register - more open hours. Mas personas que te puedan ayudar en espanol. Mas prolongedo el periodo para poder registrars - horario mas abierto”
— Survey participant

"Have more access - more locations"
— Survey participant

"Offer through avenues well-known to participants"
— Survey participant

"Have it easily accessible to apply, i.e. at DSHS, online, over the phone, at resource centers, through their bills. List the income guidelines to qualify"
— Survey participant

"Those enrolled in low-income programs get a call/email letter inviting them to enroll - or automatically enroll them"
— Survey participant

"Have trained personnel to help apply and provide information to all low-income people"
— Survey participant

"Provide interpretation, be accessible for blind and deaf individuals"
— Survey participant

Background

This survey pilots equitable community engagement and relies on equity and environmental justice best practices. Commerce partnered with low-income advocates and community-based organizations across the state to administer the surveys to households.

The survey was available in nine languages to better reach a diverse sample of respondents. The survey was provided digitally and physically in Arabic, Chinese (simplified and traditional), Spanish, Vietnamese, Somali, Russian, Ukrainian, and Tagalog.

337 individuals completed surveys. Open-ended questions were translated and standardized by Commerce. The survey did not ask for demographic information such as age, race, income, or household size.

These survey results are not statistically significant, but provide insights into how low-income households currently access energy assistance programs and their thoughts around certain program design elements. The survey results align with findings from listening sessions with low-income households, statewide participation rates in utility low-income energy assistance programs, and workshops with community organizations.

Highlights

- Almost all (95%) of the survey participants said low-income households should have the same ability to access bill assistance regardless of where they live
- Most survey participants (63%) believe low-income households with lower incomes should receive a higher bill discount, and those with more income should receive less of a discount
- Most survey participants (78%) agree that the enrollment process for assistance should be minimal if a household is already enrolled in another statewide low-income program
- Almost all survey participants (96%) agree that enrollment should be available online, over the phone, or at any local community service center serving low-income households

Conclusion

The survey results suggest Washington's electric utility customers are often unaware about home heat and power bill assistance programs.

Survey participants included households from Clark, Ferry, King, Snohomish, Spokane, and Yakima counties. Their primary languages included Spanish, Arabic, Somali, Ukrainian, and Russian.

Most participants frequently expressed that utility bill assistance would help them manage their finances in terms of saving money for current and future expenses including food and other housing costs. Some participants were specifically concerned about avoiding disconnections.

Most of the survey households are not enrolled in an energy assistance program. When asked why, most said they did not know about the programs, did not know how to sign up, or did not know they were eligible.

When asked for recommendations the participants had for maximizing participation in a potential statewide energy assistance program, the participants were largely in support of increased awareness of programs through methods such as in-person advertising, word of mouth, social media, TV, and radio. Participants also stated that increasing participation could be done by expanding eligibility requirements, increased guidance on how to sign up, and bundling the information and enrollment process with other low-income assistance programs.

Survey results

Demographics

Language

- 232 participants (69%) responded to the English survey
- 58 participants (17%) responded to the Spanish survey
- 20 participants (6%) responded to the Arabic survey
- 18 participants (5%) responded to the Ukrainian survey
- 4 participants (1%) responded to the Russian survey
- 4 participants (1%) responded to the Somali survey

County

- 124 (37%) of the survey results came from King County
- 75 (22%) of the survey results came from Spokane County
- 43 (13%) of the survey results came from Snohomish County
- 39 (12%) of the survey results came from Yakima County
- 34 (10%) of the survey results came from Clark County
- 22 (7%) of the survey results came from Ferry County

Cities:

- Everett
- Kent
- Republic
- Seattle
- Spokane Valley

- Renton
- Vancouver
- Yakima

Current enrollment in energy assistance programs

When asked if they were enrolled in the federal Low-Income Home Energy Assistance Program (LIHEAP):

- 237 participants (72%) said no
- 31 participants (9%) said they were not sure
- 64 participants (19%) said yes

When asked if they were enrolled in an assistance programs offered by their electric utility:

- 237 participants (72%) said no
- 34 participants (10%) said they were not sure
- 59 participants (18%) said yes

When asked if they had applied Low-Income Home Energy Assistance Program (LIHEAP):

- 227 participants (69%) said no
- 73 participants (22%) said yes
- 29 participants (9%) said they were not sure

When asked if they were enrolled in a federal or state social services program such as, 44% of the participants said "yes." 8 participants skipped the question. The remaining participants said they were not enrolled in a state or federal program.

Energy assistance awareness

When asked how aware they were of assistance programs offered by their electric utility:

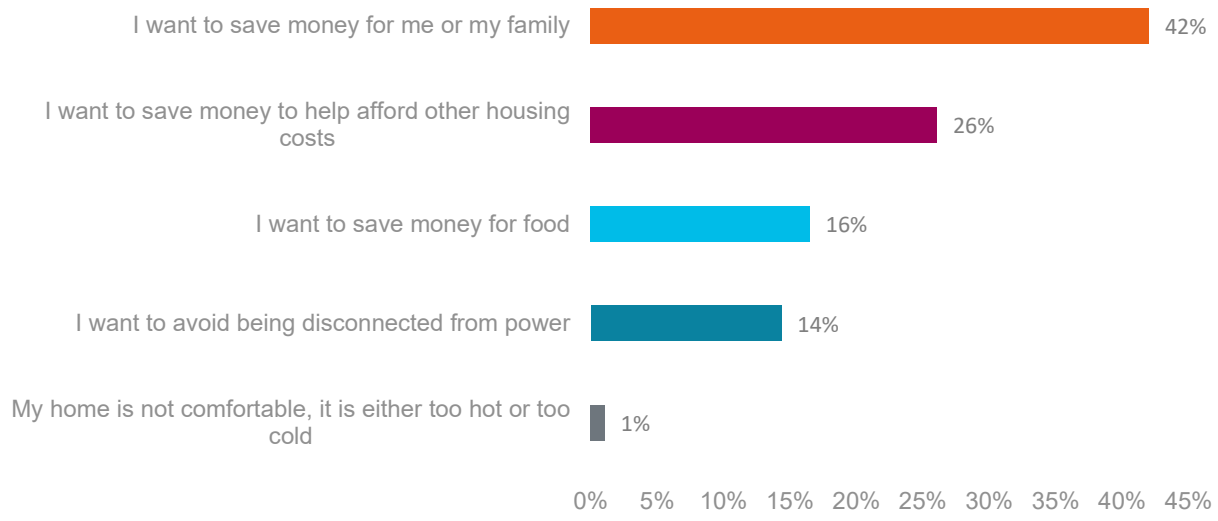
- 35 participants (16%) said they were very aware
- 128 of the participants (39%) answered they were somewhat aware of the programs offered by their electric utility
- 166 participants (51%) said they were not aware or unsure

Survey participants were asked why they were not enrolled in utility assistance programs excluding LIHEAP and 303 participants responded. 249 of the participants selected just one response.

When asked what the primary reason was for why they were not enrolled in a program with their utility:

- 131 participants (43%) said they did not know about the programs
- 90 participants (30%) said they did not know they were eligible
- 41 participants (14%) said they did not know how to sign up
- 15 participants (5%) said it takes too much paperwork and personal information to enroll
- 25 participants (8%) said they were already enrolled in a program
- 35 participants (12%) said they didn't want assistance
- 44 participants (15%) said they were not sure.
- Four participants said it wouldn't help enough to be worth their time

Responses for "If you are not enrolled in a monthly energy bill discount program, what is the main reason you haven't enrolled? The Low-Income Home Energy Assistance Program (LIHEAP) is not a utility assistance program.

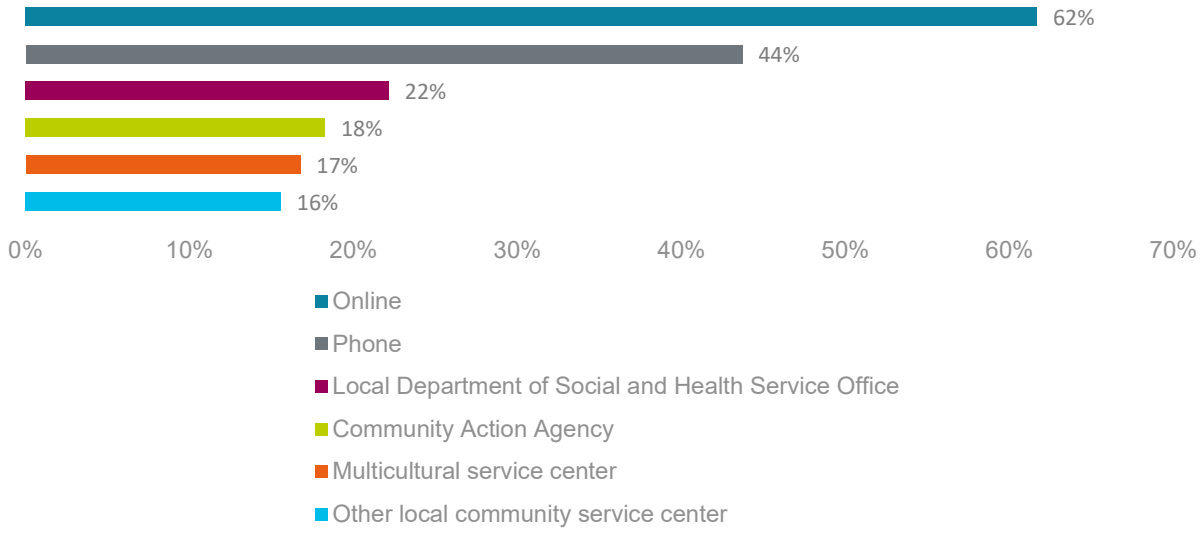


Accessing resources regarding assistance programs

When asked where they would most want to be able to sign-up for statewide or local energy assistance programs, participants overwhelmingly said online. 119 participants selected more than one answer.

- 206 participants (62%) selected online
- 146 participants (44%) selected phone
- 74 participants (22%) selected local DSHS office
- 61 participants (18%) selected community action agency
- 56 participants (17%) selected multicultural service center

Responses for "Where would you most want to be able to sign-up for a statewide or local electric utility assistance program?"



What participants would recommend to maximize awareness and participation

Survey participants were asked for recommendations on how to maximize participation in a statewide program, as well as how to increase awareness to eligible people.

Participants also stated that increasing participation could be done by expanding eligibility requirements, increased guidance on how to sign up, and bundling the information and enrollment process with other low-income assistance programs.

Methods recommended to increase awareness included traditional methods such as flyers, TV and news ads, texts, social media posts, radio, and bill inserts. Some participants recommended specific public places that could help spread awareness such as the local PUD, community centers, parks schools, food banks, grocery stores, and libraries. A few participants noted the importance of disseminating information in culturally relevant ways, such as in languages in addition to English and through unbiased facilitators.

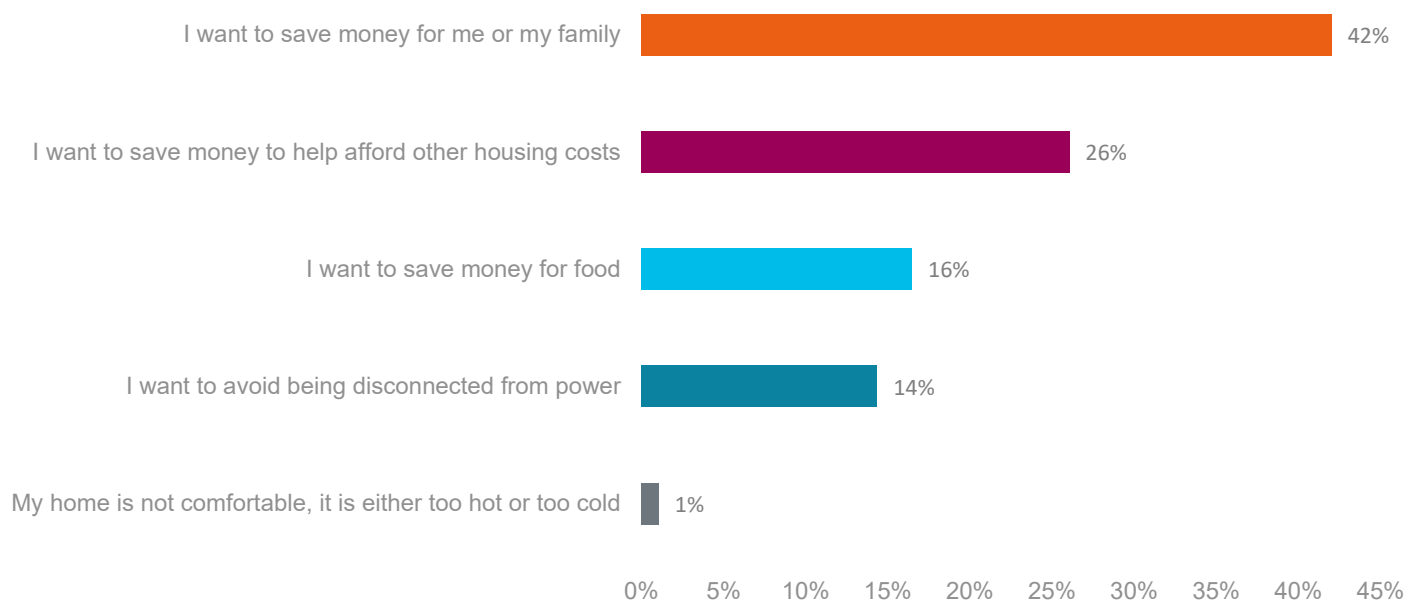
Others noted that places who already offer low-income assistance would be good places to provide the information, such as refugee centers, non-profits, senior centers, and DSHS offices.

Participants also stated that increasing participation could be done by expanding eligibility requirements, increased guidance on how to sign up, and bundling the information and enrollment process with other low-income assistance programs.

How would energy assistance help households

Survey participants were asked what the primary reason they were enrolled or would want to be enrolled in an energy assistance program. Of the 337 survey respondents, 51 skipped the question of which 45 responded "other" and mostly stated that they were not eligible for assistance programs.

Respondents who selected more than one answer to "What are the primary reasons you are enrolled or may want to enroll in an energy assistance program?"



188 respondents selected one answer

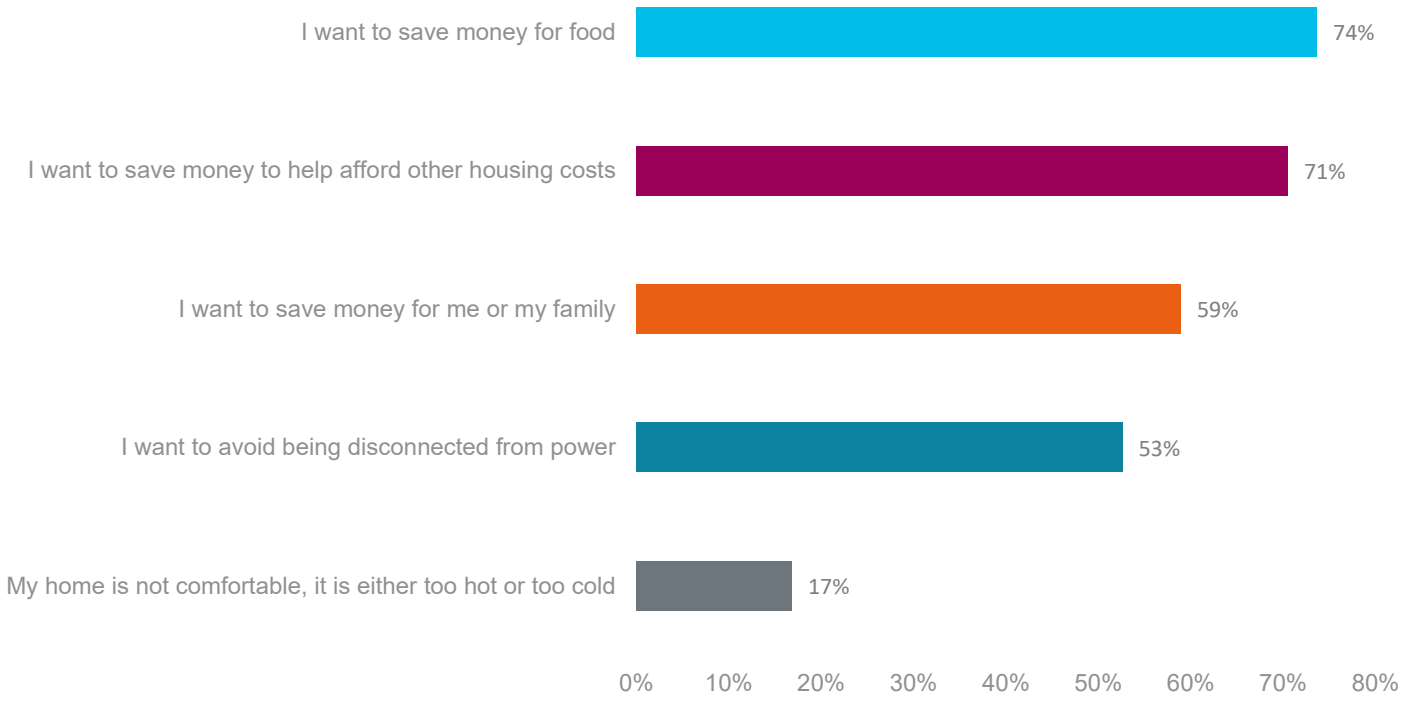
- 79 participants (42%) selected I want to save money for me or my family
- 49 participants (26%) selected I want to save money to help afford other housing costs
- 27 participants (14%) selected I want to avoid being disconnected from power
- 31 participants (16%) selected I want to save money for food
-

95 respondents provided more than one answer:

- 44 participants selected two of the answers
- 34 participants selected three of the answers
- 16 participants selected four of the answers
- 1 participant selected all five of the answers

The most common response was wanting to save money for food (70 respondents, 73%). The next most common answer was to save money to help afford other household costs (67 respondents, 70%). The third most common response was to save money for them or their family (56 respondents, 59%).

Respondents who selected only one answer to "What are the primary reasons you are enrolled or may want to enroll in an energy assistance program?"



Appendix H: Community Organization Listening Sessions Summary

Overview

Commerce conducted seven in-person workshops across Washington to co-design principles with community organizations that specialize in serving low-income households (hereafter referred to as "community organizations") that are traditionally not part of program design or policy discussions. Commerce held one virtual listening session for organization leaders who could not attend in-person. Interpretation services were offered and provided upon request. These listening sessions were in addition to Commerce's other listening sessions with utilities and statewide advocacy organizations, as well as focus groups and surveys with households.

This appendix summarizes the learnings from the in-person and virtual listening sessions with community organizations.

Methodology

Commerce conducted seven listening sessions in community spaces across Washington and one virtual listening session. Each listening session was two hours long. In total, 128 people from over 95 distinct organizations participated. Commerce sent direct invitations to participate and those that registered to participate were provided a reminder email the day before the listening session.

The listening sessions were tailored to community organizations. Great effort was taken to host a session that provided opportunity to share opinions and thoughts using adult education best practices. Small group work allowed for collective written and verbally shared thoughts and welcome activities centered participants.

Roughly half of the meeting participants reported over 10 years of experience serving low-income households, and roughly 25% reported over 20 years of experience serving low-income households. Additional details are summarized below in the Community Participation and Expertise section of this appendix.

Regional diversity

The in-person listening sessions occurred in seven cities:

- Spokane
- Colville
- Port Angeles
- Kennewick
- Stevenson
- Tacoma
- Seattle

Each listening session had participants from nearby communities. For example, participants in Spokane included community organizations from Clarkston (107 miles), and the listening session in Kennewick had participants from Granger (56 miles). This inter-regional diversity provided insights into nearby communities.

Community organizations from across the state participated in Commerce's virtual listening session.

Meeting participants

More than 128 attendees from 95 organizations that participated in the listening sessions. Attendee participation is broken out by region:

- Western Washington and the Olympic Peninsula: 44 participants
- Northwest Washington: 36 participants
- Eastern Washington: 29 participants
- Central Washington: 18 participants

Organizational diversity

Many different types of community organizations participated in the listening sessions, including:

- Multi-cultural service providers
- General social service providers
- Youth and family support organizations
- Community Action Agencies
- Housing authorities
- Food banks
- Faith-based organizations
- Tribal service providers

Notably, multi-cultural service organizations were the largest group of organizations to participate.

The meetings were designed for community organizations that specialize in providing social services to low-income households. They were open to the public and general attendance, and several utilities and statewide advocacy organizations participated.

Participant expertise

Participants had extensive experience serving low-income households:

- 70% of participants had over five years of experience serving low-income households
- Nearly 50% had over 10 years of experience
- Roughly 25% of meeting participants had over 20 years of experience serving low-income households

Only 109 of 128 participants indicated years of experience. Those who did not are not included in the percentages above.

Meeting in community spaces

Commerce met community organizations in community spaces, including:

- A local food bank
- A community economic development center
- A local non-profit organization serving overburdened communities
- Community centers
- Public libraries

Commerce's virtual listening session was held on Zoom.

Key findings

- There is a great deal of interest from community organizations across the state in the design of a statewide program and general agreement on the principles developed through earlier listening sessions with utilities and statewide advocacy organizations
- Common challenges expressed by community organizations include lack of services, limited awareness of programs and overall program navigation
- A common sentiment expressed was the hope that a statewide program could provide greater visibility and certainty to monthly low-income bill assistance, fast and easy applications and enrollment processes, and multiple doors to access the program to help provide services to households and help households get assistance, particularly for community organizations and households from historically marginalized communities
- Community organizations overwhelmingly expressed a preference for a tiered bill assistance program based on household income — which would provide greater benefits to households with less income, and less assistance to households with more income

Question: What challenges do you encounter most when serving clients?
Common response themes:

- Adversarial program requirements
- Absence of services and challenges navigating application process when programs are available
- Inequitable distribution and access to resources
- Inadequate support for households and community organizations and administrative constraints
- Institutional racism
- Poverty stigmas

Question: What do clients need to successfully access resources?
Common response themes:

- Greater programmatic visibility
- Multiple doors to access assistance
- Multicultural services
- Structure, predictability, certainty
- Easy, concise and fast applications with no unnecessary barriers to access
- Follow-ups
- Households need to be treated with dignity

Program accessibility principles
Community organizations were supportive of the following principles, developed over the course of four listening sessions and comment periods with utilities and statewide low-income advocacy organizations and additional conversation with community organizations:

- No systems that are long and complicated
- The program should have a quick turnaround time from application submission to receiving benefits
- The program should use plain language for all materials and communications
- Communications should be vetted by first-language speakers in communities
- The program should acknowledge that low-income seniors tend to live on fixed incomes, and the program should reduce the need for low-income seniors to reapply
- The program should avoid benefits cliffs

- A statewide monthly low-income energy bill assistance program should have representation of Black, Indigenous, and People of Color and other historically marginalized communities

Community participation and expertise

Commerce asked listening session participants to fill out sticky notes responding to the three questions below:

- What is most inspirational about the clients you serve?
- What challenges do you encounter most when serving clients?
- What do clients need to successfully access resources?

At the seven in-person listening sessions, participants posted their responses on easel pads with the corresponding questions. At the virtual listening session, participants shared these responses using Mural, an online collaboration space. This activity offered a different way of collecting thoughts and were summarized verbally by listening session hosts to center thoughts around households before diving into the program feedback.

Commerce shared background information about the Legislature's statewide energy assistance program design study. Commerce compiled a list of program accessibility principles developed over four program design listening sessions and comment periods in 2023 with utilities and statewide advocacy organizations. Participants were asked to review the principles and provide feedback.

Participants reviewed the benefits and limitations of different monthly energy bill discount mechanisms and ranked them. Participants were provided a handout with a summary of benefits and drawbacks of types of bill discounts based on feedback from utilities and statewide advocacy organizations. Participants could add other benefits and drawbacks, or strikethrough or amend statements on the sheet. There were also open-ended discussions at each listening session.

What is most inspirational about the clients you serve?

Resilience
The most common response was "resilience." Most of the time, this was the sole word used to describe households.

- An individual’s resiliency and ability to overcome adversity
- Their resiliency, determination, and hopefulness
- Their resilience when overcoming barriers and being able to advocate for themselves
- Many of them are going through a lot of challenges but still keep going
- They are demonstrating persistence and resilience in the face of adversity but that adversity is often the result of trauma and oppression
- They are incredibly resilient, determined, and strong
- Fighters, survivors, and unwavering.

Individual growth and betterment
Another theme was individual growth and betterment. These responses highlight the direct link between accessing social services and increased wellbeing.

- Their ability to change and grow for the better
- Being able to see [their] economic advancement and commitment

- Desire to better themselves
- Their will to live productive, caring, and socially responsible lives
- They are persistent and clearly know what they need to help improve their quality of life
- Witnessing growth, overcoming barriers and achieving goals
- Their time and being willing to share their story and invite us into their journey to a more healthy life

Thankfulness and desire to help their family and willingness to help others in their community
Community organizations stressed the gratitude of households when they receive assistance and their desire to help their family.

- Desire to provide for families
- They try hard to be there for their children
- They are part of a community
- Passion for service of their community, presenting their heritage/culture
- They want to be part of the solution
-

Another theme was the selflessness and empathy of low-income households despite their limited resources and personal hardships.

- They lift each other up by sharing knowledge, resources, or time and words
- How they hold strength for themselves and others unable to advocate for themselves
- Resistance to use of services others may need
- When they help others even if they don't have enough
-

Some community organizations specifically pointed to the positive contributions and uplifting dispositions that multicultural households bring to their communities:

- The cultural knowledge that clients bring with them
- Their positive attitude even though our elders suffered and survived a genocide; they are nonetheless grateful and optimistic

A little assistance can make a big difference for household outcomes
Community organizations highlighted how grateful households are when they receive assistance, and how rewarding it is to see the positive impact assistance has on their lives.

- Grateful, humble, and appreciative towards the little things
- They are appreciative, kind, thankful, open to assistance, and grateful
- Witnessing the positive impact that our support has on their lives
- Getting to see clients able to utilize resources offered
- Relieving stress
- Knowing our work will secure basic needs for families

What challenges do you encounter most when serving clients?

Adversarial program requirements
A common observation was that the design of low-income programs, intentionally or unintentionally, limit program accessibility.

- Complexity of requirements to access programs
- Documentation stress and complicated requirements
- Amount of personal information required to access systems or resources
- How difficult resources are to access
- Gaps in eligibility leave families in need
- Too many steps to access resources
- They become overwhelmed with how confusing it can be to access services
- Strict guidelines that are not flexible
- Having clients over income standards but not enough to meet basic needs

Absence of services and challenges navigating application process when programs are available
Many community organizations said they encounter difficulties navigating program specific requirements. Community organizations highlighted that the processes are confusing and overly complex, which prevents them and their clients from understanding what is available.

- Lack of clarity on how to access programs
- Access to services
- Lack of services in the area
- Lack of clarity on how to access programs
- Application barriers
- Navigating the application process
- Access to programs due to navigating the system
- Navigating the system
- Process barriers and unnecessary complexity
- Knowing the correct paths to get them the help they would like
- Complexity of accessing services
- Having to be creative to connect dots between service agencies – lack of collaboration
- Miscommunication due to reliance on oral or verbal communication
- They become overwhelmed with how confusing it can be to access services

Inequitable distribution and access to resources
Community organizations said that, even when resources are available, they are difficult to access and perpetuate inequities faced by their clients. Challenges included lack of resources in both urban and rural areas, as well as limited access to technology.

- Inequitable distribution and access of resources
- Challenges are lack of resources in our rural area
- No access to be able to apply
- Getting documents needed
- Accurate information and other resources

- Digital divide
- Digital and technological navigation
- Technology limitations (phone, internet), particularly for older clients
- Needing an e-mail address is a barrier
- Being able to find information in their language
- Getting people to come to resource events, despite many methods of advertising
- Digital and technological navigation
- Funder restrictions
- No access to be able to apply
- No resources to address need
- Lack of services in the area

Administrative constraints and inadequate support for households and community organizations
Community organizations said complex applications and extensive documentation requirements increase staff time spent on each applicant, and that they do not have enough staff to meet demand.

- Not enough staffing or funding
- Lack of time to serve households
- Outdated technology
- When resources run out and you hit a dead end in ways to help

Institutional racism
Community organizations noted that racial divides and disparities show up in program designs and access.

- Being underserved, marginalized, and [facing] racial discrimination
- Institutional racism
- Explicit and implicit biases
- Language barriers

Poverty stigmas
A theme most often heard in rural parts of the state was that households feel stigmatized if they seek or receive assistance.

- Some aren't open to speaking, they are resistant or closed off
- Client's pride – some are too ashamed to ask for help
- Clients do not always identify as low-income

What do clients need to successfully access resources?

Greater programmatic visibility
Community organizations stated that more outreach is needed for clients to have awareness about resources.

- It sometimes seems like services and resources are hidden
- They need to know about what is available or a place they can connect to many resources
- Outreach efforts should rely on the community relationships with us community providers that are an established trusted source for the clients
- Put more info on social media about these programs
- Information provided by radio, podcast, ads, or announcements
- More promotion

There should be multiple doors to access assistance
Community organizations stated that multiple access points would help overcome the challenges that prevent clients from seeking assistance.

- Multiple entities enrolling customers, and categorical eligibility should be provided based on participation in other programs all support the mindset that no door is a wrong door when it comes to applying for and receiving assistance. This supports ease of access and allows staff to help client apply for multiple programs
- Having it all at one location is a barrier
- For providers to make resources accessible with multiple access points and mediums

Community organizations said multiple application forms are needed. They also expressed that diverse client needs require a range of both in-person and digital resources.

- Websites that they can work with on a mobile device
- Easy to navigate one-stop website with QR code for additional information
- Households need human touch – not just filing out an application
- It is difficult for folks to get to physical location and population people serve, have documents ready, and long wait times
- Help line they can call into for assistance

Community organizations emphasized a statewide assistance program should take into account where clients currently receive resources, and barriers they often encounter when trying to access programs.

- Both outreach and engagement should be conducted with trusted community partners; would add interested parties to that, because often those trusted community partners have no bandwidth to do new work, so it would be important to consider how to bring new partners into this work
- Variety of ways to access that don't tax resources

Structure, predictability, certainty is needed for low-income households to access programs
Community organizations said the uncertain nature of program funding, eligibility determination, documentation requirements, among other things, are barriers for households pursuing enrollment.

- For resources to be there now and in the future
- Households need structure, predictability and certainty

Easy, concise, and fast applications
There was broad consensus that households need to be able to have easy, concise, and fast applications that are easily accessible.

- Easy paperwork
- If the money is available for people, they should not have to run through a maze to access that money
- Easy applications and few barriers
- Quick and direct access to resources
- Program enrollment should be easy for service providers and administrator in addition to households
- Less red tape
- Give what is needed and get out of the way
- Minimizing documentation and self-attestation help reduce documentation and barriers. Clients can get discouraged when the see all of the documents that are required

- Clear, simple processes to access resources not having to jump through hoops to access what they need
- What information does a program administrator really need to enroll in a program?
- Being able to use a different low-income program, like SNAP, to cross-enroll households would be a nice thing to have

A couple of specific suggestions include:

- Clear and understandable language
- Instructions in various audio and visual formats
- Support to follow through with application

Follow-ups are an important element of programmatic design
Community organizations noted that following up with applicants is needed to ensure households were able to access resources and receive notifications to either re-apply or update their information.

- Follow-ups to make sure they were able to get resources

Households need to be treated with dignity
Community organizations noted that basic respect and kindness need to be reflected in both individual interactions between staff and clients and within the program overall.

- Treated with dignity
- Kindness and compassion

Multicultural services should be provided
Community organizations said that language access and representation should be considered in the creation of a new program.

- Systems that reflect who they are
- Culturally appropriate services and accommodations
- Help from people who look like them
- Language access
- Culturally specific resources
- Translation materials are needed for providers

Multicultural service providers serving Hispanic immigrant communities noted challenges with existing social service programs with the hope that a statewide monthly energy bill assistance program would avoid these barriers.

- I work with a Hispanic immigrant community and many of them do not qualify due to them not having a SS# for certain energy assistance programs

Support for program principles

Commerce presented principles developed over months of conversations with utilities and statewide advocacy organizations through public listening sessions and comment periods. Local service participants asked clarifying questions and overwhelmingly expressed support of the principles.

The principle that "The program should have multiple application and enrollment methods, including methods that do not require internet access or travel to a physical location" results in significant discussion across the listening sessions.

Community organizations highlighted potential benefits and drawbacks to different ways to access the program. There comments illustrate that community organizations and households may have different needs when it comes to learning about and accessing a program.

Some community organizations stressed the importance of households being able to access services virtually:

- The program should be accessible using computers, telephones, or other means of technology besides going to a physical location

Other community organizations stressed the importance of having in-person enrollment and outreach options:

- Not having the ability to enroll folks through in-person means would create a barrier that would exclude some people in need of assistance, such as older people or those without access to the internet or the phone
- We have seen issues with households with limited technological access doing things like scanning documents

However, other service providers noted that in-person outreach and engagement can be challenging and that some households may benefit from more ways to access programs. Rural and multicultural service providers also said that in-person meetings may be stigmatizing for many households.

- Access to services in rural communities and not having access to transportation is a huge challenge, not having access to the time needed to go to appointments or interviews is another
- Trusting an online application is sometimes scary, but providing even more assistance and ways of applying (including doing it with someone in real time) could help
- In person applications can also be stigmatizing

Community organizations raised additional ways to reach households and encourage program enrollment:

- On the outreach piece, one example to look at would be the billboard campaign for the working family tax credit
- From the radio ad perspective, applications online is a big barrier for those who don't have computers. Many complaints come in about this

Additional principles

The discussions with low-income service providers led to additional principles to guide the design of a statewide program.

No systems that are long and complicated

Community organizations believe in a simplified system of providing assistance that will not be redundant or frustrating for clients.

- They should not have to run through a maze to access assistance
- It is especially good to be able to only tell your story once and be connected to as many assistance programs that you're eligible for

The program should have a quick turnaround time from submission of the application to receiving the benefit
Community organizations noted that applications should be processed quickly for applicants to receive benefits in a timely manner.

- Another barrier is the amount of time enrollment takes whether online or in-person
- Basing eligibility on net not gross income would be important, as would be enabling people to enroll immediately instead of requiring a waiting period after a life event like losing a job

The program should use plain language for all materials and communications
Community organizations requested an expansion of accessibility by simplifying language used in outreach efforts.

- Importance of supporting community partners in providing things like outreach and enrollment
- Use enrollment terms that are at a 4th grade level

Communications should be vetted by first-language speakers
Community organizations expanded on the need for increased language access through translation and verification from first-language speakers in communities to ensure that delivery matches the intent and tone.

- Communications and services should be available in multiple languages, but these communications should be vetted by first-language speakers in communities

The program should acknowledge low-income seniors tend to live on fixed incomes, and the program should reduce the need for low-income seniors to reapply
Community organizations noted that low-income seniors often do not see any year-to-year material changes in their circumstances, and that the program should try and reflect their static income in the re-application process.

- For people with a fixed income, having to re-apply year after year is unnecessarily burdensome since their material circumstances are not changing much year to year

The program should avoid benefits cliffs
Community organizations mentioned that the program should find ways to avoid abruptly pulling away support for households whose incomes rise to the point where they are ineligible for program benefits.

- Women and children are often the most vulnerable people in need of assistance, and often get caught in situations where once they are no longer eligible for assistance programs (only to face a sudden drop in the support system that helped them get to where they were going); bill assistance (without benefit cliffs) would help people in these kinds of situations, and it is important to keep this dynamic in mind
- Think through a solution to avoid loss of SNAP benefits that trickle to other disparities, and prevent advancement. Consider a transitional component, such as a three month grace period

The program should ensure protection of personal identifiable information
The idea of multiple methods of enrollment and categorical eligibility sparked discussions about data sharing and protecting information. Ensuring the security of personally identifiable information would be important for establishing community trust.

- Ensuring confidentiality and privacy may be particularly important program design features for tribes and rural households

- How to ensure cybersecurity and IT integrity

Some conservation education

- Education along with program helps with (reduce energy) consumption

Any program should have representation of Black, Indigenous, and People of Color and other historically marginalized communities

A few community organizations expressed that lack of representation of Black, Indigenous, and People of Color communities on local and state boards and committees. Community organizations said that the lack of representation discourages these historically marginalized and oppressed groups from speaking up in their hometowns or state forums to shape the policies that most impact them.

- One problem with local and state advisory boards/committees is that through observation, many people who sit on these groups are not sensitive to the needs of the people they are serving/representing
- There is discomfort around people making decisions about communities they don't have a connection with

Community organizations said there were community benefits of having more multicultural service providers be able to connect households directly to services.

- People who look like clients sharing stories, experiences and information helps build trust and spread the word

Monthly bill discount mechanisms

Commerce presented a table of monthly bill discount mechanisms with benefits and drawbacks of each. The table was developed over months of conversations with utilities and statewide advocacy organizations through public workshops and comment periods. Community organizations were invited to add additional benefits or drawbacks to the worksheet or revise those put forth by utilities and statewide low-income advocacy organizations.

The worksheet did not include a monthly grant option, because it did not receive support from utilities or statewide advocacy organizations. Community organization responses to the fixed percentage discount suggest that a lump sum grant would not have been favored either, because it would not adjust to income and not account for different needs of households.

The three mechanisms discussed were:

- **A fixed percentage discount**: Every households would receive the same flat percentage off their total monthly bill.
- **A tiered percentage discount based on income**: Households would receive a percentage off their total monthly bill that would vary based on household income tiers.
- **A personalized discount based on household energy burden**: Households would receive a lump sum amount or tiered percentage discount off their monthly energy bill based on their unique energy burden.

Community organizations expressed that all the options had pros and cons. There was an overwhelming consensus that a tiered percentage discount based on income was the best option because it was the most

equitable mechanism. The fixed percentage discount was nearly always the last choice of community organizations.

Community organizations generally agreed that the fixed percentage approach was inequitable. They generally rated a personalized discount based on household energy burden second or last of the three options, because of the administrative challenges of accounting for all the variables that can affect energy burden and potential negative impacts on energy conservation.

A hybrid option was explored, where a program would offer a tiered percentage discount based on income where the discount amount was tied to an approximate of amount of assistance needed to eliminate energy burden for households in each income tier. While there was not extensive feedback on this option at each listening session, this hybrid option appeared to receive general support from community organizations who favored either a tiered percentage discount or a personalized discount based on household energy burden.

Additional discussions

Discussion of the benefits and tradeoffs of pursuing energy assistance through energy efficiency or weatherization
Some community organizations raised energy efficiency as the primary solution to energy burden. Other community organizations said energy efficiency or weatherization cannot meet energy burden in its entirety or effectively reach many households, such as renters. They offered a number reasons why the state should focus on bill assistance.

- In community action agency partnership experience, these households (low-income households) are often most adept at conserving energy through sheer need
- [It takes a] long time to provide energy efficiency and weatherization [services]

A few providers noted the benefits a statewide bill assistance program could have on increasing awareness about conservation. Some community organizations said that once a utility knows a household is receiving a discount, it will be able to know if the household has excessive energy use and qualifies for low-income energy efficiency and weatherization programs:

- Excessive energy use might indicate weatherization/efficiency

Others noted that a statewide bill assistance program could be used to make households categorically eligible for energy efficiency and weatherization programs.

- By getting qualified for weatherization and get this at same time would be good

Community organizations in Tacoma, Stevenson and Colville also suggested that program materials for a bill assistance program could provide education about conservation and energy efficiency and weatherization programs.

Raising awareness of utility programs
A handful of community organizations suggested Commerce explore funding "navigators" for low-income energy bill assistance or lead outreach for utility programs. Commerce staff said they had considered navigators as part of its work under Sec. 120, and concluded any form of outreach on behalf of utilities would be difficult given the vast array of utility programs, lack of bill assistance programs in many areas of the state, and non-standardized eligibility requirements, enrollment processes, and benefit levels. This idea would layer

an administratively expensive outreach option on top of an already administratively expensive set of fragmented programs. It is also beyond the scope of the report, which is to look at a statewide program.

Conclusion

Commerce's listening session series took place across a wide range of rural and urban communities and utility service territories. The results of these conversations and listening sessions was the identification and refinement of program design principles and a preferred bill assistance mechanism to help inform Commerce's recommendation to the Legislature on a design of a statewide program.

Community organizations shared that low-income households are resilient, care for their families and communities, and often sacrifice their resources to support fellow community members in need. Low-income households are valuable community members and are grateful when they receive assistance. Community organizations noted that even a little bit of assistance can make a big difference in the ability to meet basic needs.

Community organizations shared that, far too often, they and the households they serve encounter complicated and confusing requirements that often intentionally or unintentionally keep households from accessing services or find no assistance program exists at all. While some community providers have direct access to program enrollment, others may not have the ability to directly enroll households in programs. Community organizations shared that households may travel significant distances to access services, only to be turned away because they do not have proper paperwork. Program materials may not be available in the language spoken by the low-income households.

Community organizations expressed that low-income services need to be highly visible with multiple doors to access assistance. Structure and predictability need to be embedded in program eligibility criteria, enrollment processes, and communications. Easy and concise applications and the elimination of unnecessary barriers to access are important for successful programs, and can reduce administrative constraints and the time it takes for households to apply and receive assistance. Community organizations also stressed the importance of elevating historically marginalized communities and addressing poverty stigmas.

Community organizations overwhelming favored a tiered bill discount program based on household income, because it was perceived to be the most equitable and not as administratively burdensome as other options.

A flat discount was not perceived to be equitable and a personalized household discount based on energy burden was widely thought to be complicated and administratively burdensome.

Commerce suggested in the listening sessions that a tiered bill assistance program could provide benefits that approximate the amount of assistance needed to eliminate household energy burden for different income tiers. Community organizations that favored either a tiered bill discount based on income or a personalized household discount based on household energy burden seemed generally receptive to this approach.

Appendix I: Program design principles and the recommended program design summary

The following principles were co-created with Washington utilities and low-income advocates over a series of workshops and comment periods. The table below summarizes some of the ways those principles are incorporated into the program design.

Table Q: Embedded Community Principles in the Program Design

Recommended statewide program design	
Principle	**Summary of how the principle was incorporated into the program design**
The program should only require application information that is required for program implementation and minimize documentation required to enroll	The program administrator should limit the information that households are required to report when applying, and should structure documentation requirements to balance ease of completing an application and preventing fraud. Strategies to accomplish this could include: Self-attestation with random post-enrollment auditing of a small sample of households Categorical eligibility for households already enrolled in other public assistance programs
The program should have multiple application and enrollment methods, including methods that do not require internet access or travel to a physical location	Application methods for a statewide energy assistance program could include: In-person at any social service organization, with assistance available if necessary User centric, mobile friendly online application Phone Mail Potential integrated benefits application
Categorical eligibility should be provided based on participation in other low-income assistance programs	The program provides categorical eligibility for federal and statewide low-income programs that align with program eligibility requirements. These include, but are not limited to: The Supplemental Nutrition Assistance Program (SNAP) Temporary Assistance for Needy Families Low-Income Home Energy Assistance Program Aged, Blind, or Disabled Cash Assistance Program
The program administrator should be able to cross-enroll customers in other low-income assistance programs	Expands organizations that provide assistance and connects programs to Washington Connection. Potential integrated application.
Multiple entities should be able to enroll customers in a statewide program	Any organization or individual can enroll a household, including: Commerce Community action agencies Multi-family community service organizations
There should be a quick turnaround time from submission of application to receiving the benefit	The discount will be applied to the household's current billing statement if the application is received within a certain number of business days before next month's billing cycle. If the application is received closer than that to the next billing cycle, the discount will be applied on next month's bill.
Self-attestation with limited documentation and small set of random income verification could balance program accessibility and integrity	The state agency will have the option to provide self-attestation. A unique advantage of a statewide program is the ability to use the Benefits Verification System (BVS) to check whether household is already enrolled in a statewide energy assistance program and remove them from verification pool. This would focus on households who are not already known to be low-income and improve the integrity of current self-attestation processes

Recommended statewide program design	
Immigration status should not affect eligibility	The program only requires what is needed to identify the household as low-income and enroll them in the program.
Both outreach and engagement should be conducted with trusted community partners	Entities that could conduct outreach or engagement for a statewide energy assistance program include: Commerce Community resource providers Administrators of other statewide assistance programs DSHS offices and subcontractor organizations Energy efficiency providers Multicultural service organizations Tribes Outreach would be supported by standardized materials designed with input of Washington low-income households and community resource providers. These materials would be translated into commonly spoken languages.
Utilities could post or distribute outreach materials with consistent messaging	Utilities would be required to post materials on their webpages (and integrate into their connection to service processes), and advertise the program at least twice a year.
Program materials and communications should use plain language and be trauma informed	Program materials and communications should: Be written at a grade school reading level Not use technical jargon or legalistic language Follow plain talk guidelines Be respectful and aim to avoid reinforcing poverty stigmas
Communications and services should be available in multiple languages with interpretation services available on request	Interpretation services should be available on-demand for clients who have limited English proficiency, and program materials should be translated into commonly spoken languages among enrolled households. Language access could be guaranteed through a mix of certified multilingual staff and contracted language services.
Outreach efforts should precede program launch	Outreach and awareness-raising campaigns should begin well before a program launches to prevent slow uptake. An illustrative schedule is initial outreach beginning 12 months before launch of the program, and ramping up 6 months before program launch.
Program materials and communications should raise awareness about the benefits of conservation	Program will be designed to include information about ways households can conserve energy, and can connect households with available energy efficiency and weatherization programs.

Appendix J: Survey of utility programs and webpages

Overview

In March 2024, Commerce surveyed utility webpages to assess the availability and accessibility of utility low-income energy bill assistance programs, and to better understand the availability and accessibility of programs from an individual household perspective.87

Methodology

Commerce surveyed the webpages of Washington's 50+ electric utilities for low-income energy bill assistance program information and followed relevant hyperlinks posted on utility webpages to view all readily available program information. Great care was taken to thoroughly document this information to minimize potential data collection errors. Commerce collected data from utility webpages in an Excel workbook and preserved the webpages and program information in PDFs, which are posted on Commerce's Sec. 120 webpage. Any information that was not readily available was labeled as "unknown."

This survey does not include important information, such as program participation rates, which will be available in Commerce's Biennial Low-Income Energy Assistance Legislative Report (Sec. 120(6)), expected before January 1, 2025.

Key findings

- Although utilities offer low-income bill assistance, nearly all (88%) of the offered programs have restrictive eligibility criteria that do not match state law (RCW 19.405.120, Sec. 120) or administrative rules (WAC 194-40-030).
- The inconsistencies across Washington's patchwork of utility bill assistance programs most often extend beyond programmatic eligibility requirements to include significantly different application requirements, varied and often limited enrollment processes, often incomplete information about eligibility and application requirements, and other barriers to understanding and enrolling in utility low-income programs.
- The Clean Energy Transformation Act (CETA) Sec. 120 set in statute the importance of providing low-income utility assistance, but it has not made a uniformly accessible bill assistance option for all low-income households statewide.

Findings

The data collected in this study shows little change in utility programs since Commerce's 2023 Legislative Report, which found Washington's utility bill assistance programs constitutes a patchwork of programs with many gaps with unavailable, inaccessible, or insufficiently funded programs. Furthermore, it finds much of the information communicated to households is incomplete or not self-evident, and in some cases outdated.

The survey's principal findings are summarized below:

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87 RCW 19.405.120 (Sec.120) requires utilities submit data on their programs on a biennial basis. Commerce last published data on utility assistance programs in 2023. Utilities were required to submit data for the reporting years 2022 and 2023 by April 1, 2024. That data will be aggregated, cleaned, and published before Jan. 1, 2025. It will be made available on Commerce's Clean Energy Transformation (CETA) Energy Assistance webpage at that time.

Most programs funded through utility operations are not open to all low-income households.

- Over half (59%) of utility-funded bill assistance programs exclusively serve certain low-income groups such as seniors or individuals with disabilities.
- Of the remaining programs, 75% (15 out of 20 programs) use income criteria that are more restrictive than what is set out in state law (Sec. 120) and administrative rules (WAC 194-40-030).
- Roughly 9% (5 out of 58) of Washington utilities do not offer bill assistance.

Many of the programs have unreliable funding sources insufficient to meet all energy assistance need.

- 42% (35 out of 84) of low-income bill assistance programs are funded through donations.
- Donation-based programs tend to only serve customers who are facing emergency situations or hardships and need to request financial assistance.

Bill assistance mechanisms have inconsistent design.

- Utility-funded programs are comprised of the following benefit mechanisms:
- 51% of programs provide a monthly discount rate.
- 18% of programs provide a monthly lump sum bill credit.
- 12% of programs did not provide publicly available information on the bill assistance mechanism or assistance amount.

Donation-based bill assistance programs are comprised of the following benefit mechanisms:

- 22% of programs provide a yearly lump sum bill credit.
- 77% of programs did not provide publicly available information on the bill assistance mechanism or assistance amount.

Low-income households see a wide range of assistance levels depending on which utility happens to serve them.

- The amount of benefit a household may receive can vary widely for utility-funded bill assistance programs.
- Donation programs offer significantly less assistance and are often only available once per year or heating season to households.

Households must navigate vastly different enrollment processes depending on their electric utility.

- The program application processes and the information available about enrollment processes vary in detail and levels of accessibility.
- 77% of donation-based programs do not list application information, and only a few offer office appointments. Less than a quarter (23%) of donation programs provide an online application.
- Utility webpages rarely provide information about when and how households can reapply for their programs.
- Utility webpages often do not provide program information in languages other than English. In many cases, utilities redirect customers to a local community action agency webpage.

Income eligibility criteria listed was found to be in some cases inaccurate and outdated

- Roughly 5% (4 out of 84) of utility webpages for low-income programs reference outdated income eligibility criteria used to determine whether a household may be eligible for bill assistance.

Information about donation-based programs is often sparse and the programs are often limited to households who can demonstrate financial hardship or emergency needs

- 77% of donation-based programs did not provide information about how to enroll in the program.

- 60% of donation-based programs provide no information on utility webpages about the amount of assistance that may be provided to households.
- 71% of donation-based programs are geared towards households facing financial hardships or emergencies.

Households interested in applying for assistance may not find information on their utility's website about how long it may take from application to receipt of benefits
It is often not clear when households will begin receiving benefits after applying for programs. Webpages that do measure timeliness often say households can wait as long as 90 days just to receive an appointment to begin the application process. This may prevent households from receiving help when they need it most.

This survey found utility low-income bill assistance program eligibility requirements often fall far below thresholds set by state laws and administrative regulations; they also deem many low-income households ineligible due to non-income-related criteria. The survey points to a number of inefficient and inequitable aspects of utility program design beyond program eligibility requirements, including inaccurate or missing information posted on utility webpages, long waitlists for appointments, an inability to enroll households through online applications, and more.

It is important to note many of these programs have existed for more than 25 years, with some nearly 50 years old. The inability to align these programs to match state laws and administrative requirements for program eligibility since the passage of CETA suggests significant challenges within the utility-by-utility approach to energy bill assistance that undermine equitable assistance to low-income households.

This would not be needed if the Legislature opts to relocate energy assistance from utilities broadly across the state through the establishment of a statewide monthly low-income energy bill assistance program.

Eligibility

Income eligibility criteria

Low-income is defined under state law (RCW 19.405.020) and administrative rule (WAC 194-40-030) as household incomes that do not exceed the higher of 80% of area median income (AMI) or 200% of federal poverty level (FPL), adjusted for household size.

Many utilities use eligibility criteria that fall below the higher of 80% of the Area Median Income (AMI) or 200% of the Federal Poverty Level (FPL). Washington's three investor-owned electric utilities and three consumer-owned utilities appear to be the only utilities to deliberately match the eligibility requirements set out in state law (RCW 19.405.020) and administrative rules (WAC 194-40-030). Okanogan County PUD No 1 and Benton County PUD No 1 use 80% AMI for their donation programs, but also limit those programs to households who are deemed to be in emergency situations.

Income criteria that fall significantly below state standards.

There are 15 utilities with income eligibility guidelines below 200% of FPL. Even if these programs raised their requirements to 200% FPL, these utilities would still have income eligibility criteria that fall below 80% AMI, adjusted for household size.

Table R: Utility-funded programs with Income Eligibility Limits below 200% FPL

Utility	Program Name	Income Eligibility Limit (FPL)
Port Angeles City Light	Low Income Discount	100-125% FPL[88]
Chelan County PUD No 1	Low Income Disabled Discount	125% FPL
Ellensburg Energy Services Dept.	Low Income Rate Seniors or Disabled	125% FPL
Richland Energy Services	Low Income, Senior Citizens, and Disabled Discount	125% FPL
City of Port Angeles	Utility Discount Program	125% FPL
Franklin County PUD No 1	Low Income Disabled Discount, Low Income Senior Discount	125% FPL, 125% - 175% FPL
Clallam County PUD No 1	Low Income Energy Assistance	138%-150% FPL[89]
Jefferson County PUD No 1	Standard Low Income	150% FPL[89]
Columbia Rural Electric Assn, Inc.	Senior Citizen Discounts	150% FPL
Pend Oreille County PUD No 1	Low-Income Senior Discount	150% FPL
Mason County PUD No 1	Canal Comfort Fund	150% FPL
Cowlitz County PUD No 1	Discounted Rate (SDDR) Program	175% FPL
City of Milton Electric Division	Reduced Utility Rates	175% FPL[90]
Centralia City Light	Senior/Disabled Discount	199% FPL[91]

Income eligibility above 200% FPL may still fall below 80% AMI.
60% of utility-funded programs list eligibility requirements at 200% FPL or higher. However, even in cases where utilities use above 200% FPL for income eligibility, Commerce found the county 80% AMI to be significantly higher.

For example, Tacoma Power's Bill Credit Assistance program uses 300% FPL for determining income eligibility. For a one-person household, 300% FPL would be $45,165. In comparison, 80% AMI in Pierce County is $60,200.

Use of other income eligibility metrics does not match state law (RCW 19.405.020) or administrative rules (WAC 194-40-030) and may make a considerable number of households ineligible.

Seattle City Light has elected against both FPL and AMI. The utility uses 70% state median income (SMI). The selection of this income criteria produces a gap in eligibility. The figure below shows the comparison between standard income limits in Washington and the city of Seattle.

[88] Range denotes programs with tiered income eligibility
[89] Utility using an income that was closest to FPL % using HHS 2024 figures
[90] Utility using an income chart that matched 200% for household sizes of one, but for households of 2+, income was not adjusted in line with 200% FPL
[91] Utility states eligibility as $30,000 per year or less for a household size of one, 2024 HHS states that 200% FPL is $30,120

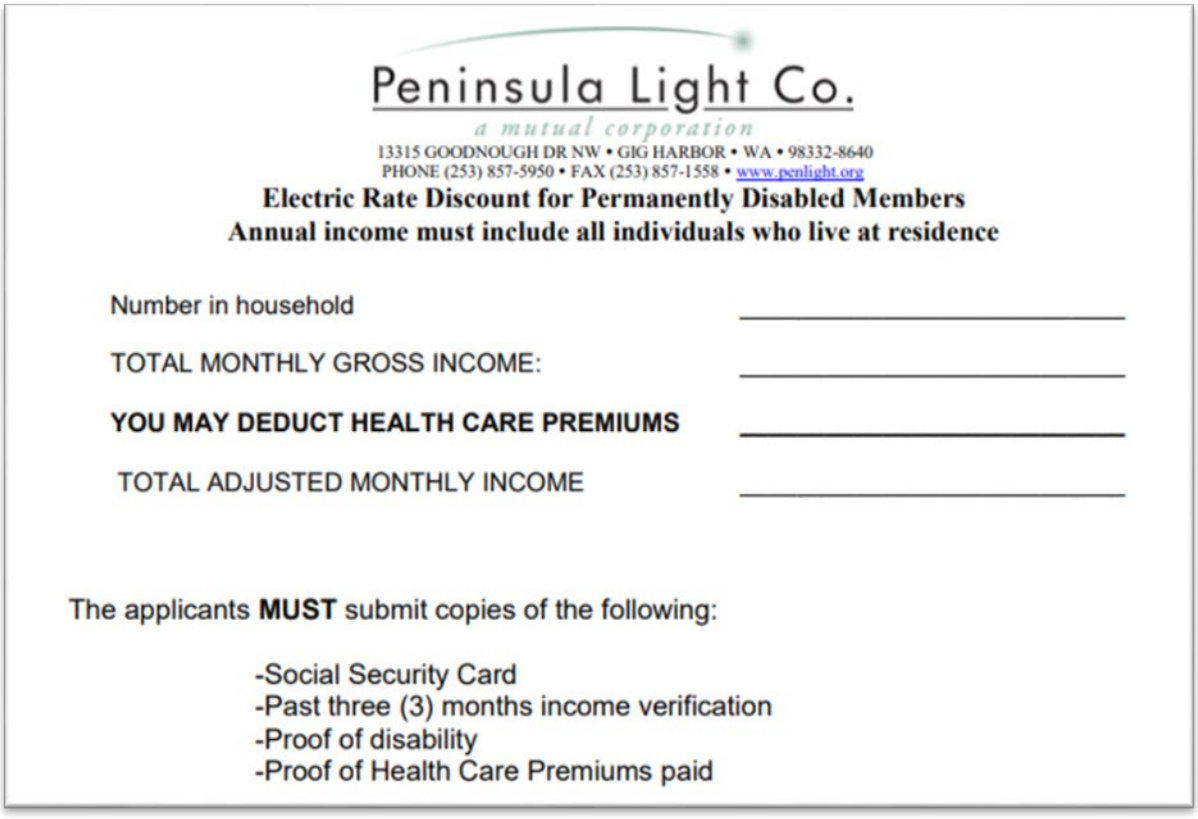
Table S: Seattle Area AMI, SMI, and FPL Comparisons

Household/Family Size	80% AMI (2023)	70% SMI	Difference
1	$70,650	$44,268	$26,382
2	$80,750	$57,900	$22,850
3	$90,850	$71,520	$19,330
4	$100,900	$85,140	$15,760
5	$109,000	$98,760	$10,240
6	$117,050	$112,392	$4,658

Utility webpages without listed eligibility criteria

There are handful of utilities with utility-funded programs that do not list any eligibility criteria on their webpages:

- Chewelah Electric Dept.
- City of Coulee Dam Light Dept.
- Modern Electric Water Company
- Peninsula Light Company
    - Peninsula Light Company does not share income eligibility requirements and requests income on the application (see screenshot below)



Peninsula Light Co.

a mutual corporation

13315 GOODNOUGH DR NW • GIG HARBOR • WA • 98332-8640
PHONE (253) 857-5950 • FAX (253) 857-1558 • www.penlight.org

Electric Rate Discount for Permanently Disabled Members
Annual income must include all individuals who live at residence

Number in household _____

TOTAL MONTHLY GROSS INCOME: _____

YOU MAY DEDUCT HEALTH CARE PREMIUMS _____

TOTAL ADJUSTED MONTHLY INCOME _____

The applicants **MUST** submit copies of the following:

-Social Security Card
-Past three (3) months income verification
-Proof of disability
-Proof of Health Care Premiums paid

Figure 1: Peninsula Light Co Application for Electric Rate Discount Program

Non-income eligibility criteria

Currently, over a third (41%) of utilities only provide programs designed for senior citizens and/or individuals with disabilities. One program includes veterans in its program for seniors and individuals with disabilities, and another program includes widows and widowers.

Different definitions for non-income eligibility criteria

Distinctions in defining non-income eligibility criteria, such as age requirements for senior assistance programs, underscore the diversity in programmatic approaches across utilities. While the majority of programs adhere to a benchmark age of 62 and over for seniors, a minority us an age threshold of 65.

Utilities defining “senior” as 65 years or older:

- Columbia Rural Electric Assn, Inc.
- Ellensburg Energy Services Dept.
- Pend Oreille County PUD No 1

Categorical eligibility for often limited programs

A handful of utilities use categorical eligibility in addition to or in place of income eligibility criteria. This approach can eliminate the need for separate income verification, simplifying the application process for customers. However, categorical eligibility may exclude individuals who do not qualify for or currently participate in the categorically eligible programs.

Many of the programs below offer categorical eligibility only for programs with income thresholds below 200% FPL or 80% AMI, adjusted for household size, and many do not include statewide low-income programs with relatively high participation rates at or above 200% FPL.

Orcas Power & Light Cooperative
OPALCO's Energy Assist program states that eligibility is determined based on participation in other programs that serve low-income households. Members who meet the qualifications for other assistance programs such as Federal Free Lunch, LIHEAP, or OPALCO’s donation-based program, Project Pal, do not have to verify their income.

Seattle City Light
The application process for Seattle City Light's Utility Discount Program and Emergency Bill Assistance eliminates income verification by accepting a SNAP (food stamps) Approval Letter for Benefits. It is unclear why the City requires an approval letter versus information readily available on an EBT card.

Jefferson County PUD No 1
Jefferson County PUD No 1's Standard Low Income program uses automatic enrollment for any customer receiving LIHEAP.

Kittitas County PUD No 1
Kittitas County PUD No 1's Low-income program also auto-enrolls customers receiving LIHEAP. Their webpage states that "Customers who qualify will be automatically enrolled annually in October, and the discount will be in effect for 12 months or until service termination." It is unclear what happens to customers who enroll in LIHEAP past October.

Public notice of eligibility requirements

Utilities typically state eligibility requirements for their assistance programs through a chart of incomes or by a percentage of AMI, FPL, or SMI.

Relying on percentages may leave customers confused and deter them from seeking assistance as income amounts based on percentages of FPL, AMI, and SMI are not readily apparent. Meanwhile, stating income amounts means the data needs to be updated annually with changes in FPL and AMI.

As of March 2024, some did not have updated numbers per the updated FPL guidelines:

- Skamania County PUD No 1
- Ellensburg Energy Services Dept.
- PacifiCorp
- Pend Oreille PUD No 1

Examples of outdated or incorrect eligibility references

Skamania PUD No. 1

Skamania PUD uses a chart to display income eligibility requirements based on FPL levels. The chart states 200% FPL for a single person household is $29,160 (see Figure 2). However, according to HHS, the 2024 FPL states that for a single-person household, 200% FPL is $30,120.

Household Poverty Guidelines

Persons in Household	100%	125%	150%	200%
1	14,580	18,225	21,870	29,160
2	19,720	24,650	29,580	39,440
3	24,860	31,075	37,290	49,720
4 or more	30,000	37,500	45,000	60,000
Rebate	**40%**	**30%**	**20%**	**15%**
Maximum Amount = $420				

Figure 2: Skamania PUD No. 1 Low-Income CETA Assistance Eligibility Criteria

Ellensburg Energy Services Dept.

The Ellensburg Energy Services Dept.'s Low-Income Senior & Disabled Discount Rate Application includes 2019 guidelines for FPL:

INCOME REQUIREMENTS. Combined household income at or below 125 percent of the federally established poverty level is:

Family Size	2019 Annual Income at or below
1	$15,612
2	$21,137
3	$26,662
4	$32,375
5	$37,712
6	$43,237
7	$39,010
8	$54,287

(For families/households with more than 8 persons, add $5,525 for each additional person.)

Figure 3: City of Ellensburg Low-income Senior & Disabled Discount Rate Application

Pend Oreille PUD No. 1

The Pend Oreille PUD No. 1 application for their Low-Income Senior Discount states that 2024 150% FPL for a single household is $20,783, but the 2024 FPL limit from HHS states $22,590. The numbers for two to nine person households do not match the 2024 FPL numbers, either.

Federal Poverty Levels

# of Persons in Household	150% of 2024 FPL	Check One
1	$20,783	☐
2	$28,207	☐
3	$35,632	☐
4	$43,056	☐
5	$50,480	☐
6	$57,905	☐
7	$65,329	☐
8	$72,754	☐
9 or more*	See below	☐

*Add $5,380 for each person in household over 8 persons.

Figure 4: Pend Oreille PUD No. 1 Low-Income Senior Eligibility Requirements

PacifiCorp

The webpage for PacifiCorp's Low-Income Bill Assistance program provides an income eligibility chart. However, when comparting them to the 2024 HHS FPL numbers, the chart references numbers for 2023 FPL. According to HHS, the 200% FPL monthly income for a single person household in 2024 is $2,510. The LIBA program states $2,430.

	Monthly Income Eligibility Upper Limits*	
Household Size	200% FPL	80% AMI Counties: Columbia Garfield Yakima
1	$2,430	$3,900
2	$3,287	$4,454
3	$4,144	$5,013
4	$5,000	$5,567
5	$5,857	$6,013
6	$6,714	$6,458
7	$7,570	$6,904
8	$8,427	$7,350

Figure 5: PacifiCorp Low-Income Bill Assistance Eligibility Requirements

Enrollment

Application

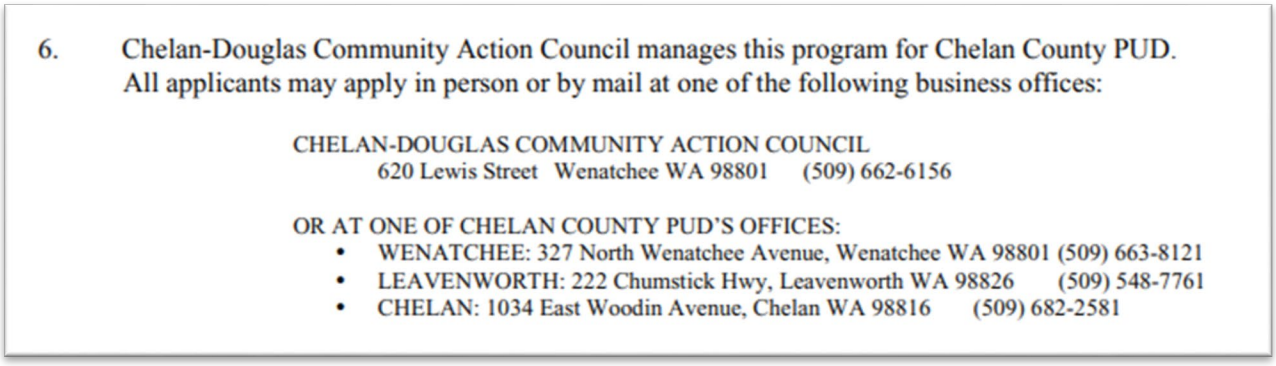
Utility webpages show differing levels of detail regarding the application process for utility-funded energy assistance programs. Most utilities offer a PDF version of the program application online. There was often little to no information on how to access donation-based programs.

The process of submitting applications also varies by utility.

Examples of application barriers

Chelan County PUD

Chelan County PUD offers a senior and disabled discount program. The application process does not include an online submission option. Applicants can submit their applications at various designated locations or by mail.



6. Chelan-Douglas Community Action Council manages this program for Chelan County PUD. All applicants may apply in person or by mail at one of the following business offices:

CHELAN-DOUGLAS COMMUNITY ACTION COUNCIL
620 Lewis Street Wenatchee WA 98801 (509) 662-6156

OR AT ONE OF CHELAN COUNTY PUD'S OFFICES:

- WENATCHEE: 327 North Wenatchee Avenue, Wenatchee WA 98801 (509) 663-8121
- LEAVENWORTH: 222 Chumstick Hwy, Leavenworth WA 98826 (509) 548-7761
- CHELAN: 1034 East Woodin Avenue, Chelan WA 98816 (509) 682-2581

Figure 6: Chelan County PUD Senior Discount Rate Program Application

Klickitat PUD No. 1

Klickitat PUD No. 1 offers no direct link to its Low-Income Elderly Rate application or submission information on its webpage. The webpage states that the Klickitat County Senior Services completes certification, but the webpage for the county does not provide any information regarding the program.



Rate Schedule: Low Income Elderly Rate

Availability

The Low-Income Elderly Rate is available for single-phase use to single family residential, farm, or tenant farm customers, age 62 or over, with a single household income of $29,160 per year or a 2-person household income of $39,440, or less. Certification will be made by Klickitat County Senior Services and requires annual enrollment. If customers move, they will need to re-apply.

Service

Service may be furnished through one meter to a single-family residence only.

	SINGLE PERSON HOUSEHOLD	2 PERSON HOUSEHOLD
DISCOUNT	Yearly Income	Yearly Income
35%	$14,580 or less	$19,720 or less
25%	$14,581 - $19,391	$19,721 - $26,228
15%	$19,392 - $21,870	$26,229 - $29,580
5%	$21,871 - $29,160	$29,581 - $39,440

Effective Date - Effective for billings issued December 2023 to May 2024.

Discounts are subject to funding limitations and may be suspended when limit is met.

Figure 7: Klickitat PUD information on Low-Income Elderly Rate

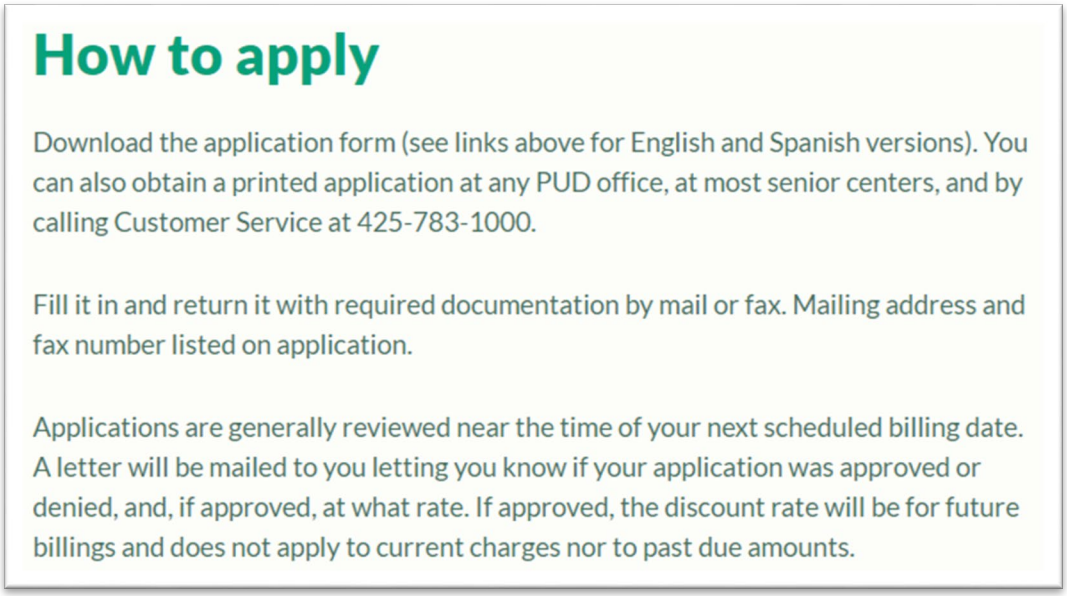
Application availability

Commerce found:

- 24% (12 out of 49) of utility-funded programs did not provide a link to the application
- 10% (5 out of 49) of utility-funded programs did not provide any application submission instructions
- 42% (21 out of 49) of utility-funded programs listed only one way to submit, including over the phone (57%) or online (33%)
- 77% of donation-based programs did not provide a link to the application

Examples of barriers to submitting applications

Snohomish PUD No 1
Snohomish PUD No 1 offers a link to their PDF application and required it to be returned by mail or fax. These submission options may be limiting for those without access to a printer or fax machine.



How to apply

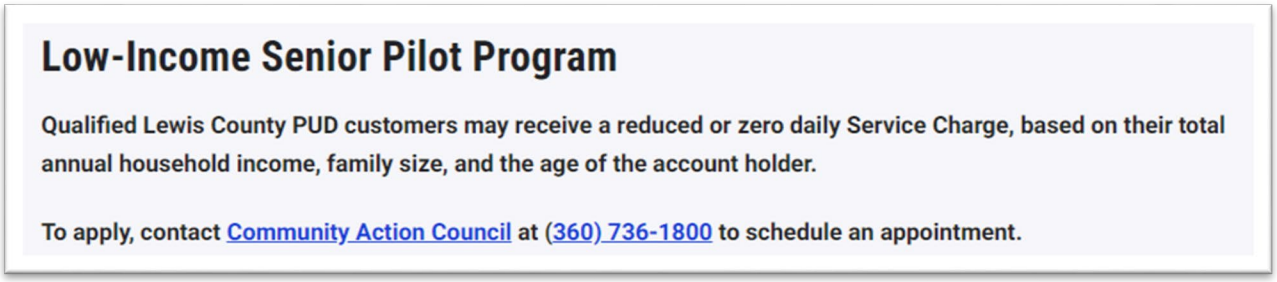
Download the application form (see links above for English and Spanish versions). You can also obtain a printed application at any PUD office, at most senior centers, and by calling Customer Service at 425-783-1000.

Fill it in and return it with required documentation by mail or fax. Mailing address and fax number listed on application.

Applications are generally reviewed near the time of your next scheduled billing date. A letter will be mailed to you letting you know if your application was approved or denied, and, if approved, at what rate. If approved, the discount rate will be for future billings and does not apply to current charges nor to past due amounts.

Figure 8: Snohomish PUD Application Instructions

Lewis County PUD No 1
Lewis County PUD No 1 does not provide a copy of the application and only provides information to schedule an appointment with the local community action agency.



Low-Income Senior Pilot Program

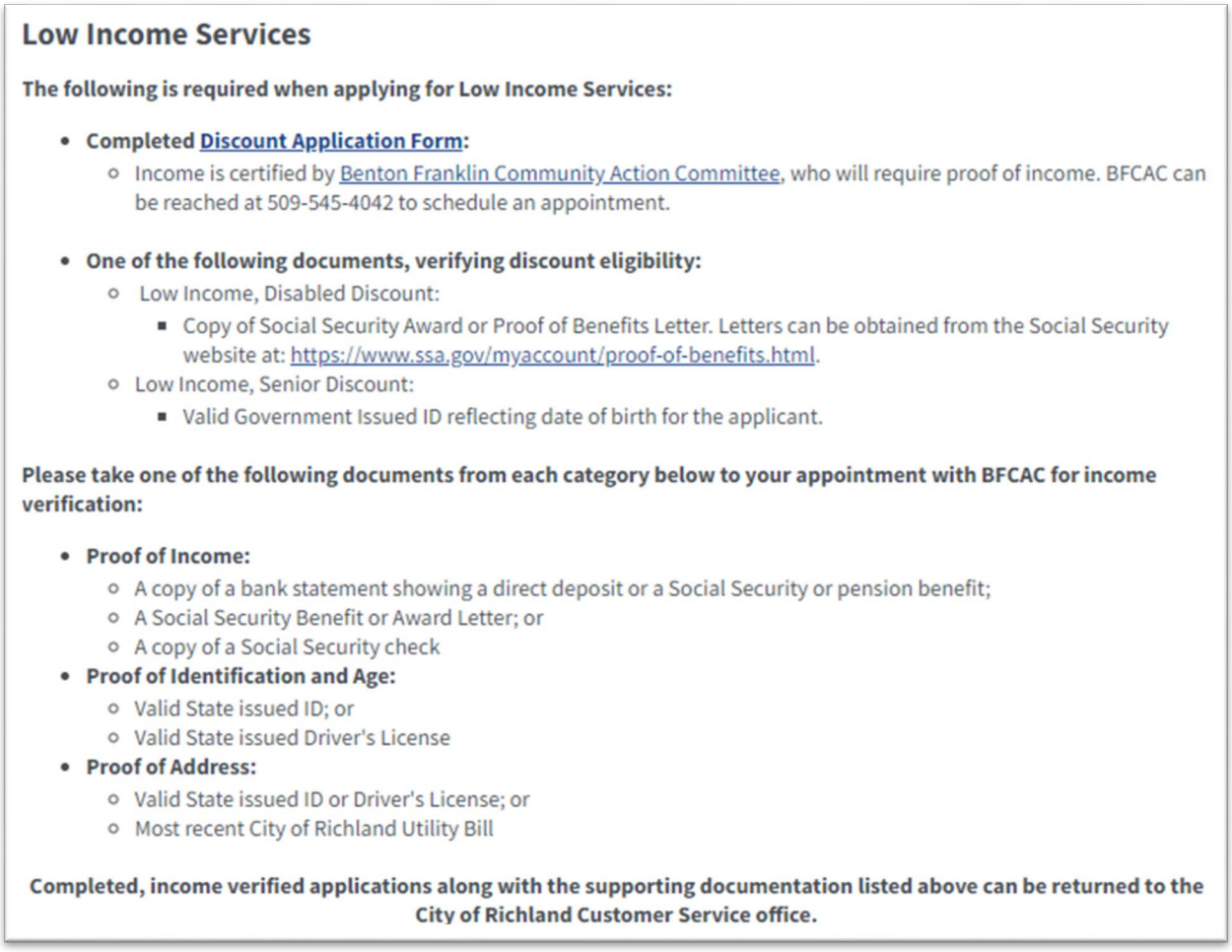
Qualified Lewis County PUD customers may receive a reduced or zero daily Service Charge, based on their total annual household income, family size, and the age of the account holder.

To apply, contact Community Action Council at (360) 736-1800 to schedule an appointment.

Figure 9: Lewis County PUD No 1 Application Process

City of Richland

Richland Energy Services provides a discounted rate program for low-income seniors and individuals with disabilities. The webpage states that the application and proof of income must be verified in person at the local community action agency, and then submitted to the City's customer service office. The webpage does not specify if the verified application can be mailed.



Low Income Services

The following is required when applying for Low Income Services:

- **Completed Discount Application Form:**
  - Income is certified by Benton Franklin Community Action Committee, who will require proof of income. BFCAC can be reached at 509-545-4042 to schedule an appointment.

- **One of the following documents, verifying discount eligibility:**
  - Low Income, Disabled Discount:
    - Copy of Social Security Award or Proof of Benefits Letter. Letters can be obtained from the Social Security website at: https://www.ssa.gov/myaccount/proof-of-benefits.html.
  - Low Income, Senior Discount:
    - Valid Government Issued ID reflecting date of birth for the applicant.

Please take one of the following documents from each category below to your appointment with BFCAC for income verification:

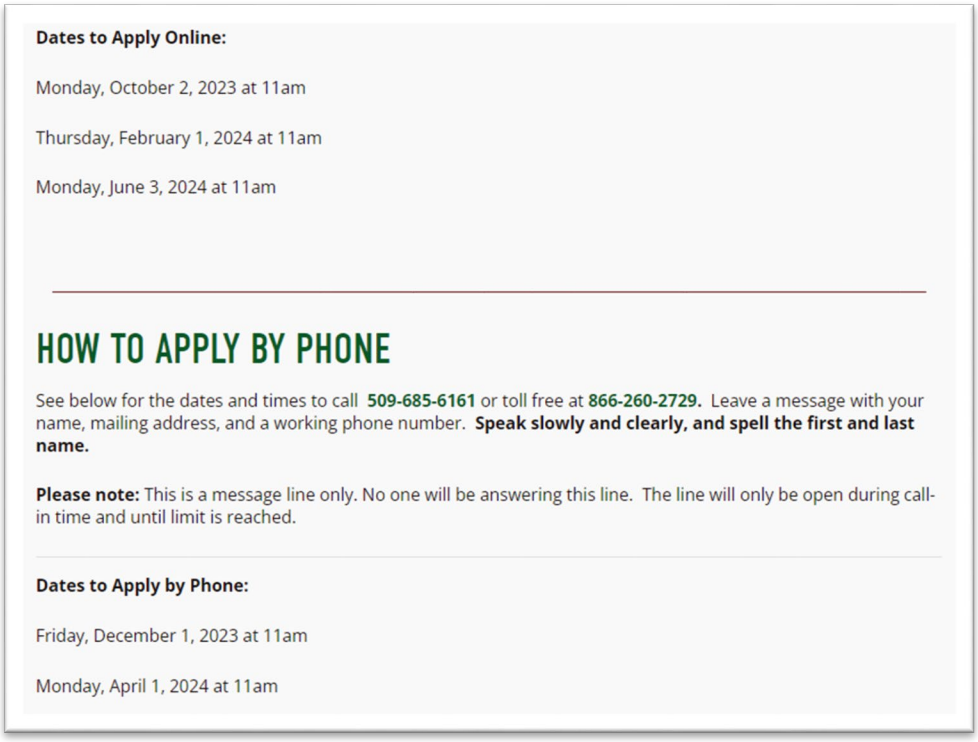
- **Proof of Income:**
  - A copy of a bank statement showing a direct deposit or a Social Security or pension benefit;
  - A Social Security Benefit or Award Letter; or
  - A copy of a Social Security check
- **Proof of Identification and Age:**
  - Valid State issued ID; or
  - Valid State issued Driver's License
- **Proof of Address:**
  - Valid State issued ID or Driver's License; or
  - Most recent City of Richland Utility Bill

Completed, income verified applications along with the supporting documentation listed above can be returned to the City of Richland Customer Service office.

Figure 10: Richland Energy Services Discounted Rate program

City of Chewelah

The utility bill assistance program administered by Chewelah Electric Department operates through Rural Resources and offers limited application dates. Online applications may only be submitted at 11 a.m. on Oct. 2, Feb. 1, and June 3. Applications can be taken over the phone starting at 11 a.m. on Dec. 1 and April 1. After submitting an application, there may be a waiting period of up to 90 days for an appointment at the local community action agency.



Dates to Apply Online:

Monday, October 2, 2023 at 11am

Thursday, February 1, 2024 at 11am

Monday, June 3, 2024 at 11am

HOW TO APPLY BY PHONE

See below for the dates and times to call **509-685-6161** or toll free at **866-260-2729.** Leave a message with your name, mailing address, and a working phone number. **Speak slowly and clearly, and spell the first and last name.**

Please note: This is a message line only. No one will be answering this line. The line will only be open during call-in time and until limit is reached.

Dates to Apply by Phone:

Friday, December 1, 2023 at 11am

Monday, April 1, 2024 at 11am

Figure 11: City of Chewelah Energy Assistance Program Application Dates via Rural Resources

Clallam County PUD No 1

Clallam County PUD No 1 subcontracts its low-income bill assistance program through the Olympic Community Action Programs, or OlyCap. OlyCap serves both Clallam and Jefferson counties. It also administers LIHEAP, which can be applied for in the same appointment scheduler on their webpage.

As of March 2024, OlyCap's webpage states that for both Clallam PUD and LIHEAP grants, there were no openings for appointments. The earliest openings are in April and customers in immediate need are directed to make payment arrangements with the utility directly. Appointments are conducted by phone.

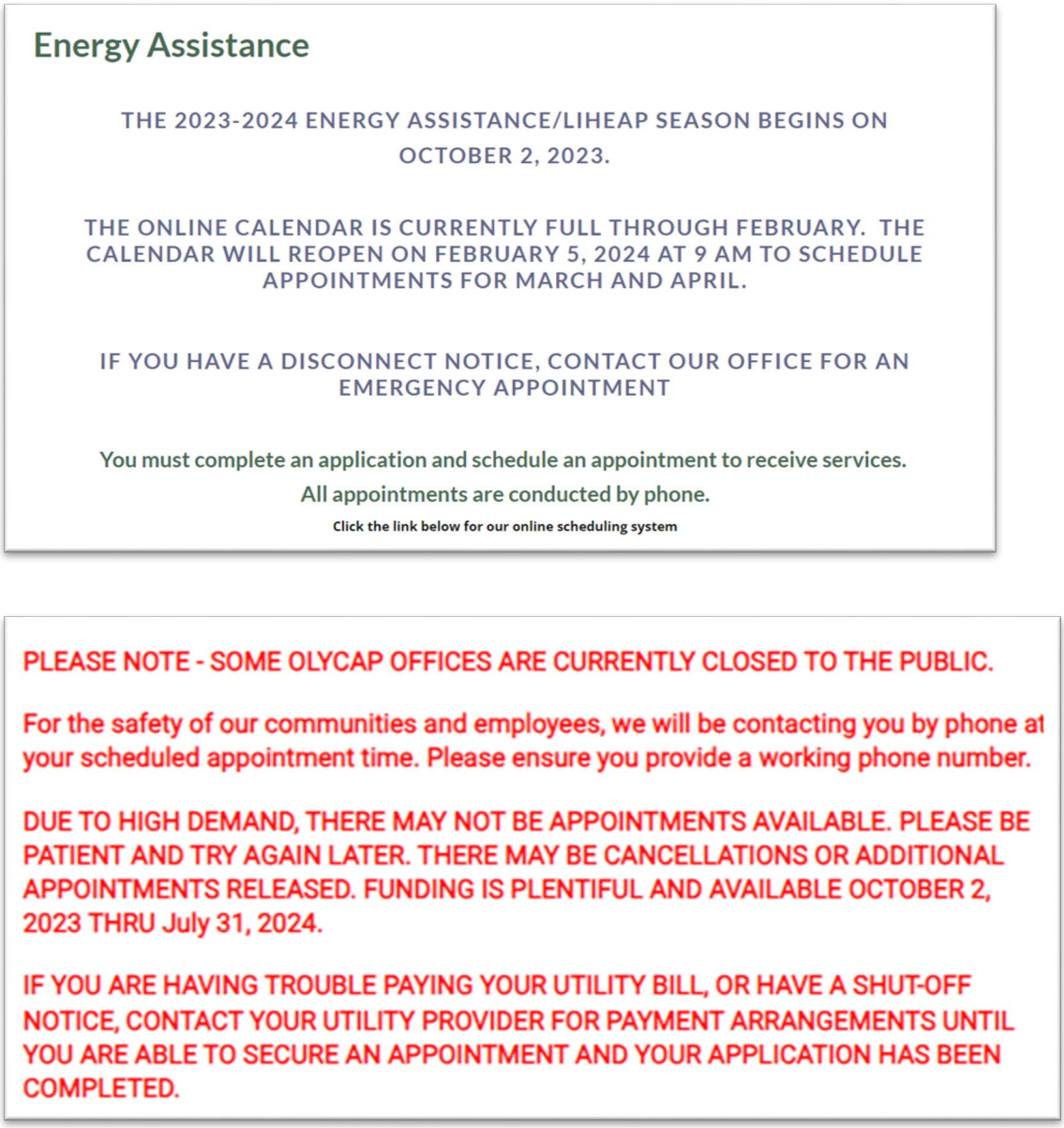


Figure 12: Clallam County PUD No. 1 Low Income Energy Assistance Application Dates

Columbia Rural Electric Co-op
Columbia REA provides eligibility and documentation requirements for its senior discount on its webpage. However, low-income seniors must call the utility to request a certification letter to be mailed, which they add their documents to and then send back.

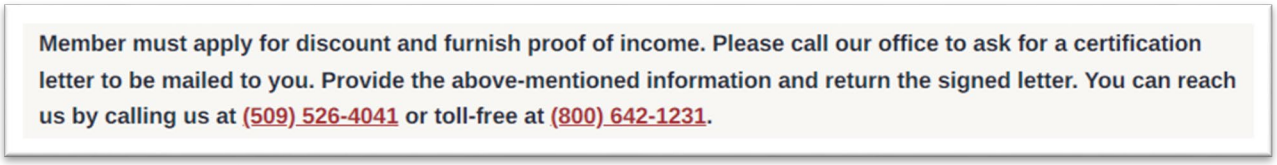


Figure 13: Columbia Rural Electric Co-op Senior Citizen Discounts Application Information

Grant PUD No 1
Grant PUD No 1 posts information for its assistance program under the "About Your Bill" portion of the webpage, which is hidden by a dropdown arrow on the "Billing & Payments" Page. Information about the assistance is not linked under "Ways to Pay", "Pay Your Bill" or "Ways to Save" The layout of the webpage does not help customers find information about assistance, as searching "assistance" did not result in a link to the program's page.

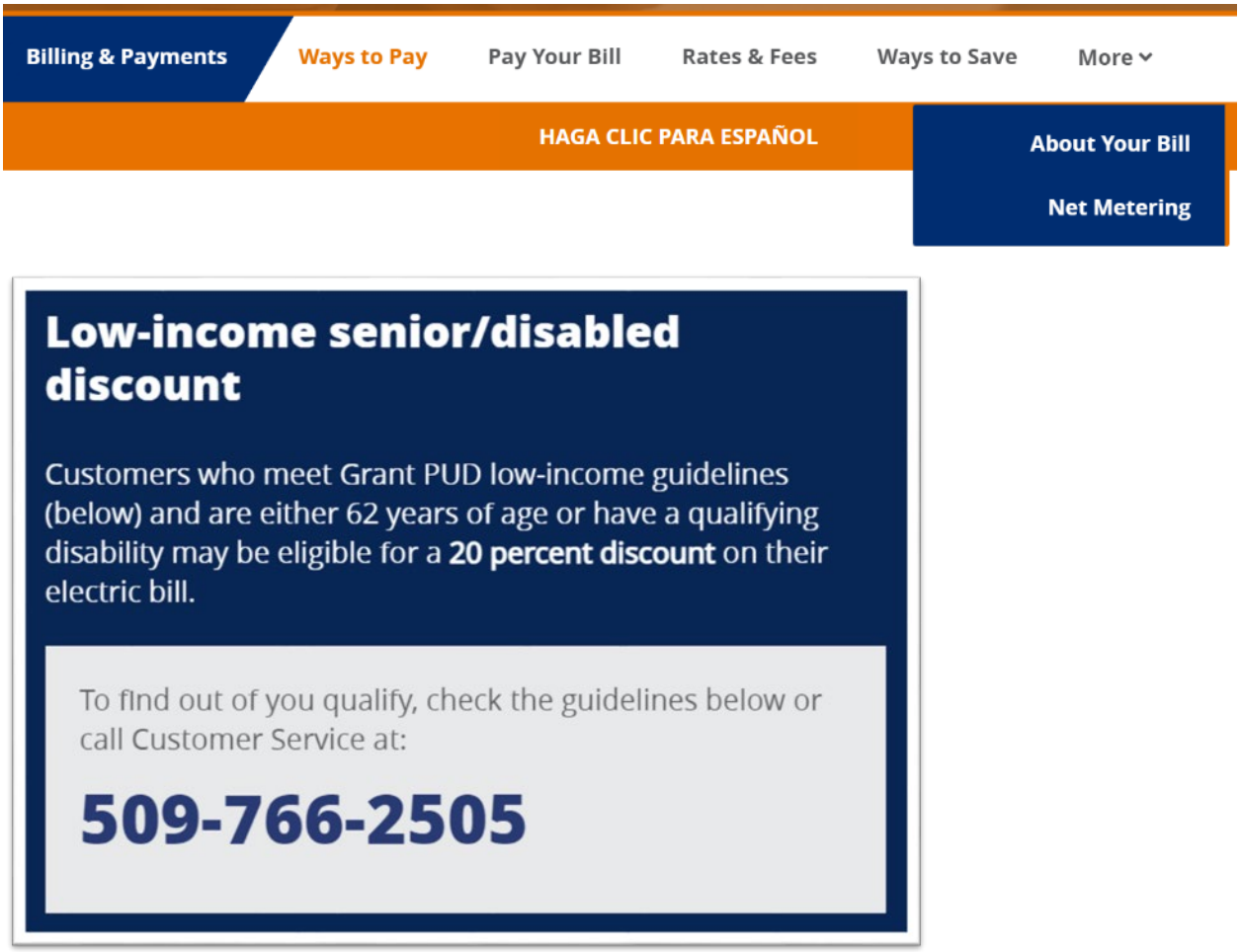
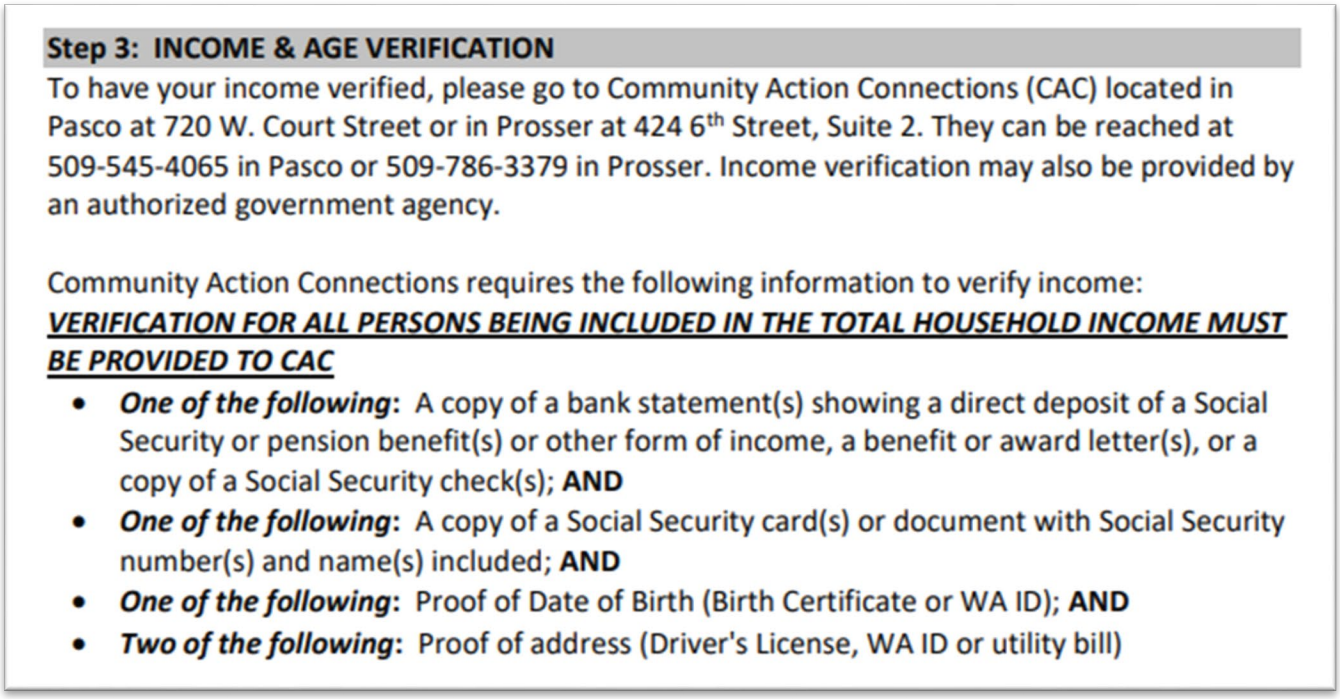


Figure 14: Grant PUD Bill Assistance Webpage

Benton County PUD No 1
Benton County PUD's Low-income discounts program requires the applicant to go to their community action agency for income verification before mailing or dropping off the application at the PUD.



Step 3: INCOME & AGE VERIFICATION

To have your income verified, please go to Community Action Connections (CAC) located in Pasco at 720 W. Court Street or in Prosser at 424 6th Street, Suite 2. They can be reached at 509-545-4065 in Pasco or 509-786-3379 in Prosser. Income verification may also be provided by an authorized government agency.

Community Action Connections requires the following information to verify income:
VERIFICATION FOR ALL PERSONS BEING INCLUDED IN THE TOTAL HOUSEHOLD INCOME MUST BE PROVIDED TO CAC

- ***One of the following***: A copy of a bank statement(s) showing a direct deposit of a Social Security or pension benefit(s) or other form of income, a benefit or award letter(s), or a copy of a Social Security check(s); **AND**
- ***One of the following***: A copy of a Social Security card(s) or document with Social Security number(s) and name(s) included; **AND**
- ***One of the following***: Proof of Date of Birth (Birth Certificate or WA ID); **AND**
- ***Two of the following***: Proof of address (Driver's License, WA ID or utility bill)

Figure 3: Benton County PUD No 1 Low-Income Discount for Seniors Application

Availability of applications in multiple languages

Program information is widely available exclusively in English. A handful of utilities provide information on the application process as well as the applications in languages in addition to English. Only three utilities included languages in addition to Spanish, which highlights a key accessibility barrier for households from a variety of cultural backgrounds.

Programs providing language translations in addition to English:

- Avista Corp: Application available in Marshallese, Spanish, Russian, Ukrainian
- Benton County PUD: Application provided in Spanish
- Benton Rural Electric Association: Application provided in Spanish
- Cowlitz County PUD No 1: Application provided in Chuukese and Spanish
- Douglas County PUD: Application and information provided in Spanish
- Franklin County PUD No 1: Program information provided in Spanish
- Mason County PUD No 3: Application provided in Spanish
- PacifiCorp: Application provided in Spanish
- Puget Sound Energy: Website language options include Spanish, Chinese, Russian, Vietnamese, Korean and Hindi
- Snohomish County PUD No 1: Application provided in Spanish
- Tacoma Power: Flyers English, Ukrainian, Vietnamese, Spanish, Russian, Korean, Khmer

Timeliness

The time between when a customer submits their application for benefits and when they begin receiving them is important information for household budgeting. This information is often not transparent.

When utilities do disclose wait times, they are often long. For example, the Chewelah Electric department said there could be a waiting period of up to 90 days for an appointment. They did disclose when benefits would begin to be applied to customer accounts after a successful appointment.

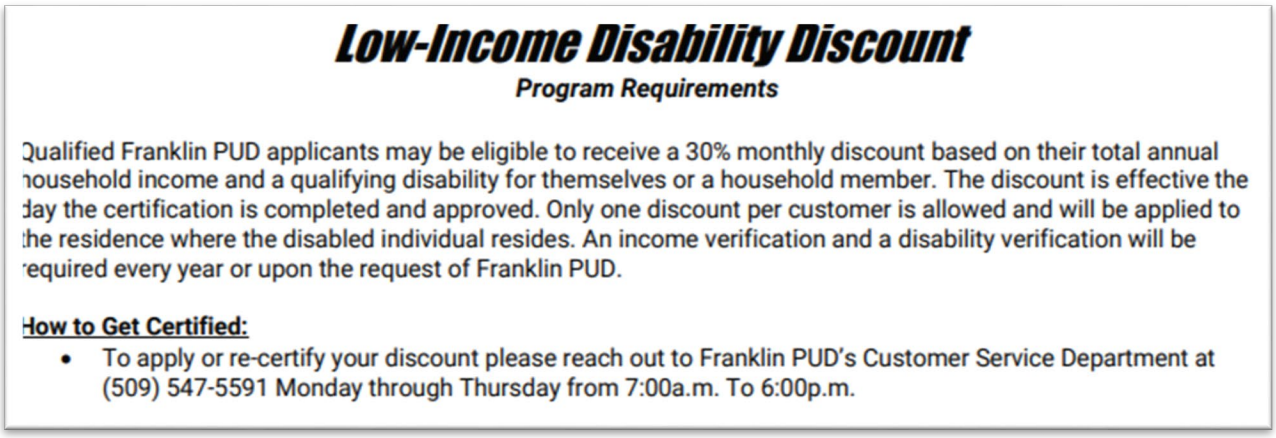
Verification and renewal process

Customers receiving benefits must undergo reapplication or reverification of income to maintain eligibility for continued benefits. Some utilities specify expectations for continuation of benefits on a biannual or annual basis. However, many programs did not provide information on the reapplication or verification process.

Examples of barriers to eligibility verification and renewal

Franklin PUD No 1

The Low-Income Disability Discount offered by Franklin PUD No 1 requires an annual re-verification of income eligibility and disability verification. This obligation for continued benefits could prove to be an unnecessary barrier for individuals, especially for those with fixed incomes or permanent disabilities.



Low-Income Disability Discount

Program Requirements

Qualified Franklin PUD applicants may be eligible to receive a 30% monthly discount based on their total annual household income and a qualifying disability for themselves or a household member. The discount is effective the day the certification is completed and approved. Only one discount per customer is allowed and will be applied to the residence where the disabled individual resides. An income verification and a disability verification will be required every year or upon the request of Franklin PUD.

How to Get Certified:

- To apply or re-certify your discount please reach out to Franklin PUD's Customer Service Department at (509) 547-5591 Monday through Thursday from 7:00a.m. To 6:00p.m.

Figure 16: Franklin PUD Low-Income Disabled Discount program requirements

Orcas Power & Light Cooperative
Orcas Power & Light Cooperative requires applications be submitted yearly by April 30. It adds a disclaimer that benefits might change due to program capacity. If a customer first applied for the program in January, it is unclear if they would still have to reapply in April despite only receiving the benefit for a few months, for example.

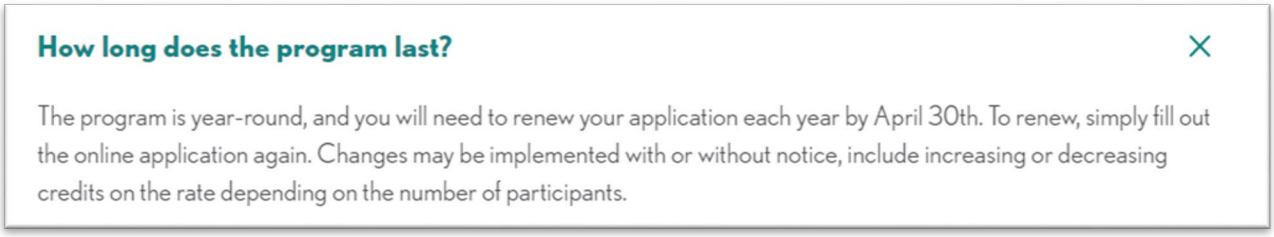


Figure 17: OPALCO FAQ Section for Energy Assist Program

Peninsula Light Company
On the Senior Discount and Disabled Discount applications, Peninsula Light Company states that the "Applicant must reapply annually in the month of April to ensure they continue to meet the program criteria."

Other programs that provide a longer timeline for program eligibility include The City of Richland's Utility Rate Discount program, which states "applicants who are eligible to receive the discount must re-apply every two years to continue their discount." Another example includes Benton Rural Electric Association's Low income Senior/Disabled Member Discount program, which is valid for three years.

Seattle City Light states that if the applicant is ineligible for the program, "Customers determined ineligible for the Utility Discount Program must wait thirty (30) days/one month to reapply." The timeline listed on their webpage for application processing is four to six weeks.

Bill assistance program design

The bill assistance programs in Washington utilize a number of mechanisms to deliver benefits to enrolled customers. The 49 low-income bill assistance programs funded through utility operations use the following mechanisms:

- 51% of the programs utilize monthly discount rates to provide ongoing relief to eligible participants
- 18% of the programs opt for monthly lump sum payments
- 12% of the programs do not specify on their webpages how benefits are determined and only provided the maximum benefit available per year
- 6% of the programs choose to reduce basic charges as a form of assistance
- 12% of the programs did not state any information regarding the benefit mechanism

Seasonal bill assistance programs and potentially confusing benefit calculations

Some utilities off bill assistance during certain months of the year. These programs aim to provide financial relief to households during periods of heightened energy consumption or increased energy costs, typically during winter. With increased cooling needs during summers, the merits of offering assistance only during the winter months is questionable.

Households may struggle to pay their energy bills at any time during the year, and the disparity between the months they may get assistance and the months they do not may pose significant challenges to them.

Examples of seasonal barriers to program access

City of Ellensburg
The City of Ellensburg states “Applications for low-income utility rate discounts are accepted year round.” However, the webpage states that applications received before November 1 are considered for the upcoming calendar year's discount. This could create confusion for customers who are not aware of the program prior to November 1.

Lewis County PUD No 1:
Lewis County PUD No 1's donation-based program, Project Share, is available for customers in need. However, the webpage states that the program "begins on November 15 and ends on May 31 of the current energy season."

Conclusion

Based on a survey of data from utility webpages in March 2024, low-income households across Washington experience a wide array of eligibility and ease of access to billing support programming based on whichever utility district they live in. The requirements of CETA did not create equity of assistance across the state. With exception of Mason County PUD No 3, only the investor-owned utilities have adopted the low-income definitions laid out by the statue and administrative rule, perhaps because their regulator, the Utilities and Transportation Commission, told them to adopt the state's income criteria.

This survey highlights that issues with utility bill assistance program design run deeper than program eligibility and touch on the human experience of searching for assistance. Perhaps not be as impactful as restrictive income eligibility criteria, inaccurate information about programs and the inability to expeditiously enroll in programs can have profound impacts on the ability of households to receive assistance.

It is unclear whether utilities can ever reach the participation rates of statewide low-income programs; however, it is clear that significant efforts would be needed to overhaul and harmonize all of these program design elements across utilities under a utility-by-utility approach to energy assistance.

Appendix K: Bill discount mechanisms

Background

There are three common bill discount programs:

- Fixed percentage discount
- Tiered percentage discount
- Percentage payment plan

These discount types are described below.

Types of discounts

A fixed percentage discount: A bill assistance discount mechanism where every household receives the same flat percentage off their total monthly bill. Some existing utility bill assistance programs provide assistance in this way, such as Seattle City Light.

A tiered percentage bill discount: A bill assistance discount mechanism where households receive a percentage off their total monthly bill, which would vary based on household income tiers. Households with lower incomes would receive a higher discount percentage and households with higher incomes would receive a lower discount percentage. Avista and Puget Sound Energy provide examples of tiered bill discount programs that target assistance to households in greatest energy assistance need.

Percentage payment plan: A bill assistance discount mechanism where a household receives a lump-sum amount off its monthly energy bill to eliminate its energy burden on a month-to-month basis. Energy burden is the percentage of household income spent on energy bills. If the energy burden threshold were to be set at 6%, for example, households would receive a bill discount calculated to keep their monthly energy bill no higher than 6% of monthly household income.

Table T: Summary of benefits and drawback of different bill assistance mechanisms

Monthly bill discount mechanisms	Description	Benefits	Drawbacks
Fixed percentage discount	Households would receive an amount off their monthly energy bill	Assistance is proportionate to energy usages. Less household information is required to administer the program.	Funds are not targeted to those with less income. Funds are not targeted to those with higher energy burdens.
Tiered percentage discount	Households would receive a percentage off their total monthly bill that would vary based on household income tiers.	Households with less income receive greater benefits than households with more income. The assistance amount could be tied to an approximate amount of a discount rate to eliminate energy burden for a households in each tier	Perhaps more difficult to administer than a flat bill discount
Percentage payment plan	Households would receive an amount off of their monthly	Energy burden specific.	Requires the most information and may be the most difficult to administer.

Monthly bill discount mechanisms	Description	Benefits	Drawbacks
	energy bill to reduce based on a percentage of household income spent on home energy.		Concern that it would cap energy costs at a percent of income and discourage energy conservation more than the other approaches.

Appendix L: Data sharing to streamline enrollment

Background

In the proviso directing Commerce to prepare this report, the Legislature specifically directed Commerce to investigate data sharing across statewide programs serving low-income households. As part of investigating such data sharing possibilities, Commerce consulted extensively with the Department of Social and Health Services (DSHS).

Commerce focused on two key data sharing questions in its consultations: the possibility of using DSHS's Benefits Verification System to streamline enrollment in a statewide energy assistance program, and the possibility of using Supplemental Nutrition Assistance Program (SNAP) data to auto-enroll households in a statewide energy assistance program.

Benefits Verification System

DSHS's Economic Service Administration's (ESA) Benefit Verification System (BVS) is public facing web-based system that allows authorized users to search for and receive a pre-determined set of information about people receiving public assistance. The BVS system requires that service providers obtain client authorization prior to searching for their information.

Commerce and DSHS discussed whether the BVS system could export data to identify and enroll households in a statewide energy assistance program. The agencies also explored if BVS could be used to identify individuals potentially eligible for energy assistance based on their receipt of public assistance benefits administered by DSHS.

The Washington State Courts attempted a similar project in 2018 to address SB 6215, "establishing a collaborative process to alleviate the burden on local courts to determine indigency through proof of receipt of public assistance." While BVS is not able to produce a list of low-income households, the Courts were able to search individual names and receive a yes or no response indicating the individual's receipt of public assistance benefits. The Courts currently use BVS for this verification, therefore potentially identifying them as indigent.

DSHS indicates that households who are enrolled in certain existing statewide low-income programs could opt to provide their social security number or DSHS Client ID number for verification purposes, and could authorize a statewide energy assistance program administrator to query BVS with their information. With appropriate data sharing agreements in place, and as allowable by federal and state laws, the state administrator could then attempt to query the household's information and verify the household is low-income.

Auto-enrollment with SNAP data

In addition to discussing use of BVS to streamline enrollment in a statewide energy assistance program, Commerce and DSHS discussed the possibility of using Supplemental Nutrition Assistance Program (SNAP) data to auto-enroll households in a statewide energy assistance program. Since SNAP uses an income threshold of 200% of the federal poverty level, and a statewide energy assistance program would likely use an income threshold of the greater of 200% of the federal poverty level or 80% of area median income, households that are enrolled in SNAP would also be eligible for an energy assistance program.

Through those discussions, it became clear that there are both federal and state legal barriers to sharing confidential information needed for auto-enrollment of SNAP recipient households in a statewide energy assistance program. ESA provided an analysis of these barriers, which comprises the remainder of this appendix.

ESA: Legal barriers to SNAP data sharing

Washingtonians trust the government with personal information to receive vital public assistance services. Public assistance information, especially food recipient data, is highly sought by many entities for excellent reasons. As responsible stewards of private information, the government examines each request to comply with state law, federal regulation, and responsibly uphold that trust.

Public assistance recipient information is private and confidential per RCW 74.04.060(1)(a). Specific federal regulations also apply to information based on the program, such as 7 CFR 272.1 for SNAP. While both have nuanced language differences, they prohibit us from disclosing client information outside of defined parameters. Foundationally, state law allows client information to be disclosed to administer a handful of state programs in Chapter 74. However, federal regulation allows SNAP client information to be used or disclosed for the purpose of administering the food program.

State law

RCW 74.04.060(1)(a) prohibits the department from disclosing records except to administer the programs in this title. Those programs include:

- WorkFirst
- Temporary Assistance for Needy Families (TANF)
- Child welfare, adoption
- Aged, Blind, or Disabled (ABD)
- Pregnant Women Assistance (PWA)
- Housing and Essential Needs (HEN) Referral
- Vulnerable Adult Abuse/Long Term Care
- Medical Assistance

Federal food client regulation

- 7 CFR 272.1 allows disclosure for:
    - Persons directly connected with:
    - administration or enforcement of the provisions of the Food Stamp Act
    - other Federal assistance programs
    - federally assisted state programs providing assistance on a means-tested basis to low income individuals
    - general assistance programs subject to joint processing requirements in 273.(j)(2)
    - programs required to participate in IEVES in 272.8(a)(2), useful to establish/verify eligibility or benefit amounts
    - verification of immigration status or aliens applying for food stamp benefits through the SAVE program
    - administration of the child support program under IV-D of SSA
- Employees of the Comptroller General's Office for audit

- Local, State, Federal law enforcement officials, on written request, to investigate alleged violation of the Food Stamp Act
- Local, State, Federal law enforcement officials, on written request, to locate an individual fleeing to avoid prosecution or custody of a crime
- Educational agencies for the National School

Appendix M: Funding options

Background

The Legislature asked Commerce to consider funding when it comes to designing a statewide low-income energy assistance program. It did not ask Commerce to recommend a funding source for a statewide low-income energy assistance program, and Commerce is not making a recommendation on a funding source.

Commerce identified and evaluated three potential funding sources to see if any of the funding choices would have any unique qualities that would impact a program design. These three funding sources include:

- The State General Fund
- Washington's Climate Commitment Account
- A system benefits charge

A commonality of all these funding sources is that they would reside within the state treasury.

The principal differences of these sources are that both the Climate Commitment Account and state general fund exist today and competition for these funds are fierce, yet they do not impact utility rate bases. A system benefits charge would need to be enacted by the Legislature and an account would need to be created within the state treasury solely for the purposes of the monthly low-income energy assistance program. A system benefits charge would be rate-based and show up on energy utility bills.

While the analysis below looks at each funding source separately, the Legislature could carefully blend funds from different sources. For instance, there may be advantages to using the State General Fund to fund program administration, a system benefits charge to fund a base amount of assistance for low-income households, and the Climate Commitment Account to supplement a system benefits charge.

Climate Commitment Account

Washington's comprehensive cap-and-invest program sets a declining cap on carbon. Carbon producers bid on allowances to emit carbon at state sanctioned auctions. Most of the revenues from those auctions go into accounts within the state general fund.

The Climate Commitment Account is one account within the state general fund funded with revenues from the cap-and-invest revenues. The list of eligible uses includes bill assistance for low-income households.

A benefit of using funding from the Climate Commitment Account is that the costs of funding energy assistance programs would not be borne electric and natural gas ratepayers. The drawbacks are that they are subject to legislative appropriation on biannual basis, and funding for the statewide program would have to compete with other priorities, albeit within a narrower range of options than the state general fund.

Sec. 47 of the Climate Commitment Act includes a statement of intent that the Legislature intends to establish policies to mitigate the cost burden of the program established by this act on consumers who use home heating fuels that are not electricity or natural gas. Funding from the Climate Commitment Account could be appropriated to a statewide energy assistance program to address energy burden from other home heating fuels, as contemplated under Sec. 47 of Washington's comprehensive cap-and-invest program, the Climate Commitment Act.

Washington Initiative 2117 (2024) would repeal the Climate Commitment Act. If the initiative passes, a statewide low-income monthly energy bill assistance program would need to be funded through the state general fund or a system benefits charge.

State General Fund

The state general fund operates on a 2-year budget cycle. The Legislature sets the biennium budget in the first year, and supplements that budget in the second year.

Funds from the state general fund would not come from ratepayers. Drawbacks to state general funds include competing needs for scarce tax dollars, the ongoing need to secure legislative appropriation, and the potential for unreliable funding due to increase-and-decreases in tax revenues from ups-and-downs in the overall economy.

System Benefits Charge

A system benefits charge is a statewide uniform charge, such as a percentage of revenue or an amount per unit of energy, assessed on energy services to fund energy assistance programs. Revenues from the charge would be placed in a state account with the explicit purpose of providing universal access and uniform benefit levels to low-income households through a statewide low-income energy assistance program.

A systems benefit charge ensures all utilities contribute to utility bill assistance for low-income households and spreads the costs across high-income and low-income areas of the state, which may mean utilities paying the most on assistance programs would pay a lower percentage of program costs under a system benefits charge.

A system benefits charge would avoid disproportionate impacts on customers of individual utilities by sharing resources across utilities to address energy burden statewide, and would especially protect customers served by small largely rural utilities with an above-average share of low-income customers with high energy burden.

A system benefits charge could be phased into the program to ensure reliable funding for a program over the medium-to-long term with the opportunity for the Legislature to review the impacts of the charge on rate payers on an annual or biennial basis. A system benefits charge would show up on customer bills.

Table U: Summary table of potential funding sources

Potential funding source	Benefits	Drawbacks	Other
Climate Commitment Account	Avoids utility rate base Potential supplement for other funding sources Fewer competing priorities compared to the state general fund	Requires legislative appropriation Fluctuations in cap-and-invest revenues Risk of funding not being consistently allocated	Funding may not exist if voters repeal the Climate Commitment Act
State General Fund	Avoids utility rate base Potential supplement for other funding sources	Competition for scarce tax dollars Requires legislative appropriation Cyclical economic dynamics Risk of funding not being consistently allocated	
System benefits charge	Dedicated funding that avoids legislative appropriation Spreads costs across high and low-income areas of the state	Hard to include non-utility energy, such as firewood and propane Dedicated account could be	Everyone contributes to low-income energy assistance Potential net transfer from some

Potential funding source	Benefits	Drawbacks	Other
		subject to legislative change in purpose Potential rate impacts to households that do not participate in the program	utilities to other utilities Uncertain if households served by utilities providing the most energy assistance today would spend more on energy assistance or less if subject to a system benefits charge

Appendix N: Caseload Forecast Council

The Washington State Caseload Forecast Council (Council) is an independent state agency governed by a bi-partisan council. The Council is charged with forecasting the entitlement and other caseloads for Washington. The Council meets several times a year to adopt official forecasts that are used as the basis of the governor's budget and by the Legislature in developing the omnibus biennial appropriations act.

The forecasts cover programs and services broadly grouped under children's services, public assistance, education, long term care, medical assistance, education, and corrections. In the public assistance category, the Council provides caseload forecasts for the following programs:

- Temporary Assistance for Needy Families
- Aged, Blind and Disabled Assistance Grant
- Working Connections Child Care
- Early Achievers Tiered Reimbursement Providers
- Working Families' Tax Credit

RCW 43.88C.030 requires the Council to produce caseload forecasts at least three times a year. The Council provides monthly monitoring reports that compare current actual caseloads with the caseload forecast. The Council provides periodic caseload forecast updates for these programs, as well as historical caseload data.

The Council produces public assistance forecasts in June, November and February, to align with major state budgetary milestones. Forecasting begins with a technical workgroup for each program. Technical workgroups include council and program staff. From the technical workgroup, forecasts next move to formal workgroups, which include more senior staff, and are then advanced to the body that oversees the agency, called the governing council. The Council is made up of representatives from the House, Senate and Executive branch. These forecasts estimate program demand through the end of the current budget period.

In combination with the Council's caseload forecasts, the agencies that administer programs use estimates of per capita program costs to estimate program costs. The Council does not forecast program costs.

If the Legislature were to create a statewide low-income energy assistance program, forecasting caseloads for this program would be within the scope of the Council's experience and mandate. The Council has recent experience forecasting demand for new assistance programs, including the Working Families' Tax Credit. Caseload forecasts from the Council for a statewide low-income monthly energy bill assistance program would provide an open and transparent process for regular, consensus-based estimates of future program demand.

Appendix O: Benefit cliffs

A benefits cliff occurs when a household experiences a sudden increase in household income that makes them ineligible for assistance programs, triggering a sudden loss of assistance. Depending on the value of the lost benefits compared with the income increase, these households can be left with fewer total resources than when they had less earned income.

With a presumptive income threshold of the greater of 200% of the federal poverty level or 80% of area median income, it is especially important for an energy assistance program to include a mechanism to avoid an abrupt benefits cliff. This is near the income thresholds for several existing public assistance programs, notably the Supplemental Nutrition Assistance Program (SNAP) and the Working Connections Child Care subsidy. SNAP has an income threshold of 200% of the federal poverty level, and the Working Connections Child Care subsidy has an income threshold of 60% of state median income upon initial application, and 65% of state median income when reapplying for benefits.

This similarity in income thresholds means that some families receiving benefits from all three programs could lose all of those benefits at the same time after a sufficiently large increase in household income. For families with child care needs, this could be particularly impactful. A 2015 study from the Seattle Jobs Initiative found that for Washington families with children, the loss of child care subsidies was often the benefits cliff with the greatest impact on total household resources because of the high cost of child care. Losing energy assistance at the same time could exacerbate this impact.

When public assistance programs and administrators take proactive action to smooth the transition from receiving an income increase and becoming ineligible for public benefits, low-income households face one less barrier to upwards economic mobility. While policy responses like earned income tax credits can help mitigate the impact of the benefits cliff across many public assistance programs, there are also a number of examples of program-specific strategies that a statewide low-income energy assistance program could emulate.

Transition periods

One such strategy is to provide a transition period following an income increase that allows households to receive benefits when they would otherwise be deemed ineligible for assistance. This transition period gives households enrolled in public assistance programs time to plan for the transition off public benefits, instead of facing a sudden loss of assistance.

Several states that have utilized or are piloting transitional periods for their social service programs. For example, the New Hampshire Department of Social and Health Services is piloting a program to close the benefits cliff, with one element of that pilot program being a temporary 100% income disregard for households enrolled in Temporary Assistance for Needy Families (TANF) with members working in high-demand jobs. In 2019, Maine passed the STEP bill, which created a six-month stepped transition for households receiving TANF that receive new income, with 100% of earned income disregarded for the first three months after an income change, 75% of earned income disregarded for the following three months, and 50% of earned income disregarded after that initial six-month period. TANF benefits reduce as a household's income increases up to the limit at which they are no longer eligible, so these income disregards allow enrolled households to work and retain more of their income without immediately affecting the benefits they receive from TANF.

Washington instituted its own changes to TANF income rules aimed at addressing the benefits cliff in 2023. Chapter 418, Laws of 2023 specifies that, effective August 1, 2024, families receiving TANF may keep the first

$500 of earned income each month that the family receives benefits. TANF families in Washington also retain half of any monthly income earned above $500.

Transitional benefits

Another means of addressing the benefits cliff is providing dedicated transitional benefits aimed at bridging the gap between an income increase and a loss of public assistance benefits. In Washington, the Transitional Food Assistance (TFA) program provides temporary food assistance benefits once households are deemed ineligible for these programs or request to leave them.

For households enrolled in TANF and SNAP, TFA provides up to five months of food assistance benefits following a household being deemed ineligible for TANF.[92] For households enrolled in SNAP only, when their reported gross income exceeds program limits, they automatically receive a $10 benefit called Temporary Cash Assistance (TCA) in their last month of SNAP eligibility. Households eligible for the TCA benefit are then also eligible for TFA for five months.[93] TFA benefits are calculated based on the monthly benefit a household received in its last month of TANF eligibility or the month it was eligible for TCA.[94] By providing households an additional five months of food assistance between becoming ineligible for TANF and SNAP, TFA aims to give households additional time to plan for and adjust to the transition off public assistance while retaining access to food benefits.

TANF support payment pass through

A TANF-specific strategy that Washington and other states have implemented is a pass through of previously withheld support payments. In order to receive TANF benefits, households must assign their rights to any child support, spousal support, alimony, maintenance, or medical support payments to the state for the duration of the time they receive TANF benefits.[95] Federal law allows states to pass through up to $100 a month of these support payments, or $200 a month for a family with two or more children, to households receiving TANF without any requirement for states to reimburse the federal government for these payments.[96]

Chapter 349, Laws of 2020 directed the Department of Social and Health Services (DSHS) to pass through up to $50 a month of support payments, or up to $100 a month for a family with two or more children, to households receiving TANF, effective February 1, 2021. Building on that, Chapter 174, Laws of 2024 directs DSHS to pass through the full amount of all support payments to households receiving TANF, and also requires DSHS not to count these pass through payments as income for the purposes of determining eligibility for TANF, or the benefit amounts that enrolled households receive. This law is effective January 1, 2026.

With support payments disregarded for determining TANF eligibility or benefit amounts, households receiving both TANF benefits and support payments can earn more income through work while remaining eligible for the program than if support payments counted against their monthly benefits.

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[92] Washington State Legislature, "WAC 388-489-0005," (2024), WAC 388-489-0005:
[93] Department of Social and Health Services, "Transitional Cash Assistance," (2022), Transitional Cash Assistance | DSHS (wa.gov)
[94] Washington State Legislature, "WAC 388-489-0010," (2024), WAC 388-489-0010:
[95] Washington State Legislature, "WAC 388-422-0005," (2024), WAC 388-422-0005:
[96] Library of Congress, "S.1932 - Deficit Reduction Act of 2005," (2024), S.1932 - 109th Congress (2005-2006): Deficit Reduction Act of 2005 | Congress.gov | Library of Congress

While pass through payments are helpful for programs that provide direct benefits to households, a low-income monthly bill assistance program benefits would be applied to a household's energy bill and would not count as income.

Benefits calculators

A final strategy to reduce the effects of the benefits cliff is benefits calculators, which allow households enrolled in public assistance programs to easily understand how changes in household income will affect the benefits they are receiving. Tennessee funded a benefits cliff initiative in 2022 that combines a benefit calculator with coaching and temporary assistance to cover household expenses like housing and childcare, with the goal of easing household transitions off public benefits as incomes rise.

Statewide energy assistance program and the benefits cliff

Local service providers and low-income households in Commerce's workshops suggested that a statewide low-income energy assistance program should avoid creating or exacerbating benefits cliffs.

Even without dedicated transitional assistance, if a program featured a tiered bill mechanism — where a household's monthly bill discount was based on their income — there would be a gradual ramping down of benefits as household income increases, until a household is no longer eligible. This could provide a smoother transition off the program than with a uniform discount, where a household's monthly bill discount would stay the same as household income increases, until dropping to zero as soon as a household is no longer eligible for the program.

Additionally, an income threshold of the greater of 80% of area median income or 200% of the federal poverty level could help prevent a statewide energy assistance program contributing to a compound benefits cliff, where multiple forms of assistance disappear following a single change in household income. Based on analysis of area median income versus the federal poverty level for households up to eight people, 80% of area median income exceeds 200% of the federal poverty level for more than 75% of household sizes across counties statewide. Since SNAP uses an income threshold of 200% of the federal poverty level in Washington, this means that as long as a household's income was below 80% of area median income, many families enrolled in a statewide energy assistance program would remain eligible for these benefits after an income increase that put them over the threshold for SNAP eligibility.

For families where household size and geography means that 200% of the federal poverty level is greater than 80% of area median income, a single income increase could mean simultaneous ineligibility for both a statewide energy assistance and SNAP, and a loss of these benefits at the same time or in close succession. Additionally, even with a tiered benefits structure, the shift from the lowest tier of benefits to no benefits after exceeding an energy assistance program's income threshold could be abrupt and disruptive for enrolled households, so it would be important to include measures to mitigate the impact of the benefits cliff, such as a transitional assistance mechanism.

There are several examples a new energy assistance program might emulate. One is Maine's stepped TANF income disregards, detailed previously, where income increases are initially disregarded for determining benefits and are gradually accounted for in increasing amounts. Under this mechanism, a household's energy assistance benefit would initially stay the same upon an increase in household income above the program threshold, and would gradually decrease until eventually disappearing.

Another example is Transitional Food Assistance, where households that exceed the SNAP income threshold are eligible to receive benefits for an additional five months. Under this mechanism, a household's energy

assistance benefit could stay the same as in their last month of eligibility for a set period following an increase in household income above the program threshold.

Finally, an energy assistance program could develop a benefit calculator or otherwise make it easy for households to understand how their bill discounts would change in response to a change in household income. This could aid households in planning for the transition off energy assistance by showing them exactly how their energy bills would change, including any available transitional assistance.

Benefits cliffs hamper households' economic mobility, so a statewide low-income energy assistance program should include design elements that can mitigate the potentially significant negative impacts of an abrupt loss of benefits.

Appendix P: Best practices in social service program design

Background

Commerce researched common pitfalls to avoid and national best practices for program design to inform its recommended design of a statewide monthly low-income energy bill assistance program.

The goal of this research was to learn from the body of research and experiences of existing federal and state public assistance programs, understand what best practices and principles should guide the development of specific elements of a statewide low-income assistance program, and provide background to guide further research and consultation on specific topics.

This appendix summarizes that research, and draws on published governmental and non-governmental sources, as well as information gained through consultation with community resource providers, low-income households, state agencies and utilities.

Common public assistance program pitfalls

National research shows that while public assistance makes a significant difference for eligible people, many struggle to access available benefits, leaving billions of dollars of assistance unclaimed each year nationwide.[97,98]

Roadblocks to access take a variety of forms, including the items below.

Restrictive and complex eligibility criteria

Many existing public assistance programs have eligibility criteria beyond household income. These additional criteria can exclude some communities entirely, and force households to make difficult choices to become eligible. For example, immigration status criteria can exclude people who are not U.S. citizens or fall into other categories of non-citizens, and some immigrants who are eligible for public assistance may choose not to apply over fears, sometimes based on misinformation, that public charge determinations could impact their ability to change their immigration status.[99] Resource-related criteria can exclude people with assets over a certain value, such as vehicles, and checking or savings accounts balances. This programmatic choice might lead people to liquidate and spend down assets. These limits can discourage households from developing savings.[100]

Program and eligibility awareness

In some cases, people cannot access available public assistance because they do not know a particular program exists. In other cases, despite knowing a program is available, people may struggle to find

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[97] Code for America, "Social Safety Net," (2024), Social Safety Net — Code for America
[98] National Council on Aging, "$30 Billion Left on the Table: Connecting More Older Adults With Money-Saving Benefits," (2024), Why Do Older Adults Miss Out on Financial Benefits? (ncoa.org)
[99] Food Research & Action Center, "Food Over Fear: Overcoming Barriers to Connect Latinx Immigrant Families to Federal Nutrition and Food Programs," (2020), NILC_Latinx-Immigrant-Families.pdf (frac.org)
[100] Andrea Louise Campbell, "Trapped in America's Safety Net," (2014), Trapped in America's Safety Net: One Family's Struggle, Campbell (uchicago.edu)

information about its eligibility criteria.[101] This uncertainty about whether they are eligible or likely to receive benefits can discourage people from applying for assistance.

Application and recertification challenges

Finally, many existing public assistance programs have application and recertification processes that can be challenging to navigate. Long application forms with legalistic or technical language and extensive documentation requirements create high workloads for applicants and increase the chance of application errors that require back-and-forth with program staff to resolve.[102] The requirement for follow-up interviews with clients after submitting an initial application can create an additional barrier if an interviewer is not available same-day or during an applicant's initial interaction with a program, since clients must then find additional time in their schedules and are sometimes given limited options by program administrators.[103] Recertifying that a household is still eligible for a program can be burdensome if the requirements for recertification are not clear, or the recertification period is short.[104]

All of these challenges are compounded if it is difficult for households to access application information or assistance from program staff.

Stigma and client experience

There is mixed research on whether poverty stigmas impact public assistance enrollment. Regardless, public program messaging can help combat stigmas. Unfortunately, pro-actively addressing poverty stigmas does not always happen, and people who interact with public assistance programs regularly report having demeaning or rude interactions with program staff. Additionally, clients of public assistance programs regularly report customer service challenges like difficulty accessing necessary information or navigating application processes.

Case study of enrollment barriers

Supplemental Nutrition Assistance Program (SNAP) is one of the largest and well-known federal public assistance programs in the county by enrollment, with an average of over 42 million monthly participating households in fiscal year 2023.[105] While SNAP's prominence, broader eligibility criteria and large enrollment make it more accessible compared with other federal programs, and there have been a host of state and national initiatives to further improve its accessibility, nationwide it still suffers from some of the common barriers above.

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[101] Congressional Hunger Center, "Barriers That Prevent Low-Income People From Gaining Access to Food and Nutrition Programs," (2011), Microsoft Word - Barriers to Food and Nutrition Programs, FRAC.doc (hungercenter.org)
[102] 101
[103] Code For America, "Think Big, Start Small: How Implementing Flexible Interviews Improves Benefits Delivery," (2021), Think Big, Start Small: How Implementing Flexible Interviews Improves Benefit Delivery — Code for America
[104] Congressional Hunger Center, "Barriers That Prevent Low-Income People From Gaining Access to Food and Nutrition Programs," (2011), Microsoft Word - Barriers to Food and Nutrition Programs, FRAC.doc (hungercenter.org)
[105] U.S. Food and Nutrition Service, "Supplemental Nutrition Assistance Program Participation and Costs," (2024), SNAP Participation and Cost (azureedge.us)

It is difficult to say with certainty why eligible households do not enroll in SNAP, but many individuals report believing they are ineligible for the program or application challenges as reasons for not starting or completing the enrollment process.106

Some groups, such as seniors, are more susceptible to some of these barriers than others. Nearly half of older adults who are eligible for SNAP do not participate, and this group commonly reports reasons like the difficulty of navigating long electronic application forms, stigma, or a lack of transportation to get to and from food assistance offices for in-person appointments.

For immigrant families, particularly households with family members who have a mix of immigration statuses, common barriers to accessing SNAP include fear or mistrust of government, fear or misinformation about public charge rules, and language and transportation barriers.

General public assistance best practices

Given the important function of public assistance programs and the many existing barriers to access, governments, non-governmental organizations and researchers have spent significant time developing best practices and strategies to make assistance programs more accessible. While much of this research focuses on mitigating barriers to accessing existing programs, the principles behind these best practices are still very relevant to designing a statewide monthly low-income energy bill assistance program.

The following best practices were collected from both community engagement sessions and research, and are organized according to their relevance to different components of public assistance programs.

Eligibility

There are several strategies a program can use to minimize the barrier that eligibility criteria might pose to program accessibility.

Make eligibility criteria easy to understand

Perhaps the simplest strategy is ensuring that eligibility criteria are easy to understand for prospective clients. Obviously a program cannot guarantee that a person is eligible before they complete the application process, but if it is difficult for someone to know if they are likely to be eligible, they may be less inclined to apply. Clearly communicating eligibility criteria can reduce the likelihood of misunderstandings that lead to an erosion of trust in a program once someone reaches the application stage.

Carefully consider appropriate income criteria

The income criteria for a public assistance program is among the most important aspects of eligibility criteria.

Lower income thresholds will limit a program's reach and exacerbate the impact of losing benefits once a household exceeds the income threshold. In addition to the income threshold, it is important to consider what a program will define as "countable income." Including payments like child or spousal support can reduce the amount of income a household can make from wages without exceeding a program threshold, and add

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[106] Economic Research Service, "Food Stamp Program Access Study — Final Report," (2004), Food Stamp Program Access Study: Final Report (usda.gov)

complexity to the application and recertification processes. Income criteria must be carefully designed to maximize accessibility within given parameters.

Forego resource thresholds

Resource eligibility thresholds can be a limiting part of existing public assistance programs. These limits can prevent people from developing savings.[107] Accordingly, raising or eliminating resource thresholds is a common suggestion for improving the accessibility of public assistance programs and improving their ability to help lift people out of poverty by allowing them to develop savings without being penalized by a loss of benefits.

Application and enrollment

The application stage can include barriers that may prevent people from accessing benefits or add unnecessary complexity and time to the process. Both the design of the process and the tools used to implement it can affect the accessibility of a program application.

There are many technologies available to program administrators that can streamline application processes.

Online forms can work for many people, although they need to be designed intentionally so it is easy for users to understand what they are being asked to provide, do not take an excessive amount of time to complete, and are optimized for easy use on a smartphone.

The ability to accept telephonic signatures is another technology that can streamline the application process, allowing program staff to complete an application with a client over the phone.[108] Technology can also assist program staff in conducting any required verification of client information, either electronically or over the phone, which can further speed the application process.

Ensure availability of multiple application methods

While online forms work well for many people, others prefer applying over the phone with assistance from program staff, and still others may lack the ability or comfort to use these application methods, instead needing a paper application in a program office.

Differences in application preferences can be for a variety of reasons, such as low level of comfort with online forms or limited internet access. Regardless of the reason, it is important that a program provide multiple methods to accommodate everyone.

Streamline documentation requirements

If a program requires extensive documentation of household characteristics or does not clearly communicate what documents are required, some households may not complete the application process and others may end up going back and forth with program staff to meet the requirements. Documentation-related barriers can be particularly difficult to navigate for people who are self-employed or work in certain fields such as agriculture. Minimizing the documentation that households are required to provide, clearly communicating

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[107] Urban Institute, "Do Asset Limits in Social Programs Affect the Accumulation of Wealth?" (2005), Do Asset Limits in Social Programs Affect the Accumulation of Wealth? (urban.org)
[108] Urban Institute, "Strategies for Improving Public Benefits Access and Retention," (2023), Strategies for Improving Public Benefits Access and Retention.pdf (urban.org)

what kinds of documents can meet program requirements, and giving applicants the ability to submit documents online or have information verified over the phone can reduce these barriers.

Recertification

Public assistance programs that require enrolled households to periodically recertify, confirming that they still meet all the program requirements and accounting for any changes in relevant household characteristics, must ensure that recertification does not create unneeded barriers. Since it shares many similarities with the application stage, recertification is subject to many similar best practices.

Carefully consider appropriate recertification periods and requirements

Longer recertification periods mean fewer opportunities for unintentional errors that may lead to the loss of benefits for a household and the resulting need to re-apply to a program. Additionally, less frequent recertification reduces administrative burden on program staff. The information that a program requires at recertification can also make a difference in the ease of the process.

The inclusion of extraneous information that does not have bearing on a household's continuing eligibility or that would not have changed during the recertification period requires additional time from both households and program staff. Limiting the information that households are required to provide at recertification reduces workload for households and staff, and helps prevent "benefits churn" as a result of unintentional errors and resulting re-applications.

Leverage available technology to streamline recertification

Technology can help streamline recertification. It can include auto-populating online forms with already known household information, accepting telephonic signatures to allow for recertification over the phone, or maintaining a portal accessible online or over the phone that can provide information about approaching deadlines.109

Ensure clear and timely client communication

Another challenging aspect of recertification is keeping track of required deadlines. For households enrolled in multiple public assistance programs, recertification deadlines are unlikely to align, so it is beneficial for a program to communicate with clients well before a deadline. This can be accomplished through automated reminder notices like emails, phone calls or text messages. Reminder notices should include clear instructions and information on how clients can recertify, and what documentation might be required.110

Outreach

Thoughtful outreach is an important way to raise general awareness of a public assistance program's existence, provide key information such as eligibility criteria, application, and benefit details, and reach historically marginalized groups. There are several best practices that can improve the effectiveness of public assistance program outreach.

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[109] Center on Budget and Policy Priorities, "Improving SNAP and Medicaid Access: SNAP Renewals," (2024), Improving SNAP and Medicaid Access: SNAP Renewals (cbpp.org)
[110] 12

Ensure information is accurate and current

One of the fastest ways a program can lose the trust of prospective clients is by giving them information that turns out to be inaccurate. This can lead to discouragement and frustration. Ensuring program outreach information is accurate and current is crucial, and is especially important when working with community partners. Care needs to be taken to regularly ensure that partners from outside the program are not unwittingly sharing inaccurate information with prospective clients, and that these partners are updated on any relevant changes to program information.

Partner with trusted community messengers

The trust between community partners and prospective clients lends credibility to a program. People are often more receptive to messages from peers or an organization they already have a relationship with than to social media ads, flyers or text messages from an unknown program. Trusted community messengers may know who in their community could benefit most from a particular program, and may be the most effective way to communicate information. Finally, outreach by community partners that can assist with the application process can make people more likely to act on information they receive.

Tailor outreach through data

Analyzing demographic data is an important way to improve the efficacy of outreach by identifying communities or groups that are underrepresented in a program. With this information, a program administrator can tailor outreach efforts to address this service gap.111 This can include seeking out new partnerships or increasing the volume of outreach directed towards a particular community or group, or adjusting the messaging of outreach for more effective communication.

Client experience

Finally, there are several important customer service best practices that involve interaction between clients and program staff.

Treat clients with respect in all program interactions

As discussed previously, embarrassment and poverty stigmas can be significant obstacles to accessing public assistance, and public assistance programs have a history of adding to feelings of indignity through practices like requiring fingerprinting as a condition of receiving assistance.112 Treating clients with decency and respect can reduce the stress of applying for and receiving public assistance, and ensure that program staff are not making an already challenging situation even worse.

Ensure program information, materials and assistance is available in multiple languages

Language access is critical if a program wants to offer assistance equitably to people who do not speak English or have limited English proficiency. For a program administrator, this means ensuring that program materials are easily accessible in commonly spoken languages other than English. It also means ensuring that

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111 Urban Institute, "Strategies for Improving Public Benefits Access and Retention," (2023), Strategies for Improving Public Benefits Access and Retention.pdf (urban.org)

112 National Public Radio, "The Clash Over Fingerprinting for Food Stamps," (2012), The Clash Over Fingerprinting For Food Stamps : NPR

clients have ready access to interpretation services when interacting with program staff in-person or over the phone.

Use plain talk and minimize legalistic or technical language

Finally, program materials should strive to use plain talk to the greatest extent possible, and avoid using legalistic or technical language. This is especially important for application and recertification materials, as well as information about eligibility criteria. While regulations and administrative rules form the structure of public assistance programs, the requirements they create should be translated into plain language that can be easily understood by someone with an elementary-school reading level. By doing so, a program ensures that its information and forms are accessible to people from a variety of backgrounds, and can reduce the risk of procedural errors due to misinterpreting or misunderstanding an unnecessarily technical form.

Appendix Q: Categorical eligibility for a statewide low-income energy assistance program

Categorical eligibility describes a method of determining a person or household's eligibility for a public assistance program in part based on their participation in a different public assistance program with comparable eligibility requirements.

Categorical eligibility can relieve documentation-related burdens for clients and program administrators. If certain client information has already been verified by another program and a program does not require categorically eligible clients to submit documentation of this information again, administrative staff do not have to spend time reviewing these documents and clients do not have to spend time collecting and submitting them. This reduces administrative burden, application wait and processing times, and makes it easier for households to complete the application process.

Supplemental Nutrition Assistance Program categorical eligibility

The Supplemental Nutrition Assistance Program (SNAP) has among the most well-documented categorical eligibility standards of existing Washington public assistance programs. Per WAC 388-414-0001, the Department of Social and Health Services determines that households are categorically eligible for the purposes of SNAP if every member in the household receives cash assistance from one of the following programs:

- Temporary Assistance for Needy Families (TANF)
- Tribal Temporary Assistance for Needy Families
- State Family Assistance
- Supplemental Security Income
- Aged, Blind or Disabled Cash Assistance
- Diversion Cash Assistance (this assistance only makes a household categorically eligible for SNAP for the month it receives diversion cash assistance and the following three months)

Households are also determined to be categorically eligible if their countable income is at or below 200% of the federal poverty level. These households are eligible for information and referral services funded by federal TANF or state maintenance of effort dollars, which makes them categorically eligible for SNAP, according to U.S. Department of Agriculture regulations.

Categorically eligible households automatically meet the following SNAP requirements:

- Countable resource limit
- Maximum gross monthly income
- Maximum net monthly income

Categorically eligible households do not need to provide the following information if it is available from another program:

- Social Security number information
- Sponsored alien information
- Residency information

Households that are categorically eligible for SNAP still need to complete an application and interview, and must meet other program requirements. Categorically eligible households also need to provide income information for the purposes of calculating their SNAP benefit.

Combining categorical eligibility with other programmatic features

One feature of the Supplemental Nutrition Assistance Program's (SNAP) worth highlighting is its broad-based categorical eligibility, which provides a means of mitigating the effect of the benefits cliff and making it easier for program participants to develop savings by effectively raising income and asset thresholds.113

Broad-based categorical eligibility for SNAP refers to the ability of states to make households categorically eligible for SNAP if they are eligible for a non-cash benefit funded by Temporary Assistance for Needy Families funds or state maintenance of effort funds. In Washington, this nominal non-cash benefit is a notification about information and referral services, available to households with gross incomes at or below 200% of the federal poverty level. This effectively raises the SNAP gross income threshold from the federal standard of at or below 130% of the federal poverty level, to 200% of the federal poverty level, and removes the federal SNAP asset limits. With this higher gross income threshold and no asset limit, households can make more earned incomes, and keep and grow savings while remaining eligible for SNAP.

Categorical eligibility program recommendations

When considering which existing public assistance programs would be good candidates for categorical eligibility for a statewide monthly low-income energy bill assistance program, there are several eligibility factors a program administrator could use to filter out programs with compatible requirements. The most salient eligibility factor is income, as additional requirements of other programs, like resource or immigration status requirements, would not disqualify applicants from a statewide energy assistance program.

Accordingly, existing public assistance programs with income thresholds that fall at or below the proposed energy assistance income threshold (whichever is greater of at or below 200% of the federal poverty level or 80% of area median income) would be good initial candidates for categorical eligibility. The following programs meet these criteria:

Assistance program	Applicable income threshold
Supplemental Nutrition Assistance Program (SNAP)	At or below 200% of federal poverty level
State Food Assistance Program	Same as SNAP
Women, Infants and Children Nutrition Program (WIC)	At or below 185% of federal poverty level
Temporary Assistance for Needy Families (TANF)	Based on set monthly gross income by household size, but does not exceed 200% of federal poverty level
State Family Assistance	Same as TANF
Refugee Cash Assistance	Same as TANF
Pregnant Women Assistance	Same as TANF
Supplemental Security Income (SSI)	Based on set monthly gross income and household circumstances, but does not exceed 200% of federal poverty level

[113] Center on Budget and Policy Priorities, "SNAP's Broad-Based Categorical Eligibility Supports Working Families and Those Saving for the Future," (July 2019), SNAP's "Broad-Based Categorical Eligibility" Supports Working Families and Those Saving for the Future | Center on Budget and Policy Priorities (cbpp.org)

Assistance program	Applicable income threshold
Aged, Blind or Disabled Cash Assistance Program (ABD)	Based on set monthly gross income and household circumstances, but does not exceed 200% of federal poverty level
Housing and Essential Needs Referral Program (HEN)	Same as ABD
Diversion Cash Assistance	Same as TANF; clients are only eligible for this program for one 30-day period per year
Washington Apple Health modified adjusted gross income-based adult programs	At or below 133% of federal poverty level for adults who are not parents or caretaker relatives; at or below 193% of federal poverty level for people who are pregnant
Washington Apple Health Medical Care Services Program	Same as ABD and HEN programs
Washington Apple Health SSI-related programs	Same as SSI
Washington Apple Health TANF-related programs	Same as TANF
Working Connections Child Care Program	At or below 60% of state median income for initial application, at or below 65% of state median income when re-applying

Making categorical eligibility a feature of a statewide low-income energy assistance program would streamline the application process for households and the program administrator, particularly in the absence of an option for households to self-attest to their income. By taking advantage of the fact that households already enrolled in other public assistance programs have had their incomes verified, these efforts would not need to be duplicated and households would not need to collect and submit income-related documentation.

Appendix R: Department of Commerce outreach and community engagement

Overview

Commerce conducts outreach and community engagement through statewide outreach and community engagement teams, resources and best practices that support the work of more than 100 programs. These teams, resources and practices ensure that program information reaches those who need it, and that communities across the state can contribute to shaping agency programs so they can best fulfill their mission. Among those 100 programs are several public assistance, housing and energy programs that could also be valuable outreach partners for a statewide low-income energy assistance program.

The Healthy Environment for All

Washington's environmental justice law, introduced as the Healthy Environment for All Act (HEAL), passed in 2021. Now in statute, Chapter 70A.02 RCW provides a roadmap for integrating environmental justice into state agencies. Commerce is one of seven agencies required by that statute to take certain actions to institutionalize environmental justice into its operations, including adopting an environmental justice-centered community engagement plan and a tribal consultation framework.

Commerce's provisional environmental justice community engagement plan introduces Commerce staff to environmental justice principles and provides guidance on implementing an environmental justice lens for community engagement. It seeks to provide resources for staff to be inclusive and proactive when engaging Washington residents in program planning and delivery, especially overburdened communities and vulnerable populations who have been exposed to a high degree of pollution and environmental harm. Additionally, it provides methods and tools for reporting key screening, assessment and engagement practices data that will help Commerce measure its engagement practices.

Community Engagement and Outreach Team

Commerce has a dedicated community engagement team and external communications team. This team has dedicated staff who live across the state and regularly engage with community organizations, leaders, businesses, and households. The team's priority is to support and advocate for Washington communities furthest from equity.

In 2019 the Community Engagement Team was asked by Commerce to design and implement a pilot to test community engagement practices in small and underserved communities. The pilot has informed engagement plans and practices across the agency, such as the environmental justice-centered community engagement plan.

The community engagement team assist agency staff with designing and facilitating community engagement activities, and developing effective program communications for external audiences. This team was integral to designing and facilitating the series of co-design workshops with community organizations across the state that Commerce hosted as part of this program design study.

Tribal Outreach Team

Commerce's Office of Tribal Relations is a standalone unit within the Director's Office that serves as the main conduit between the agency and tribes within Washington. The office coordinates formal government-to-

government consultations between Commerce and tribes when these consultations are offered or requested. It also provides consultation and support for agency programs that are engaged with tribal coordination or informal consultation.

In addition to coordinating and supporting specific consultations between agency programs and tribes, the office also develops agency tribal engagement policy and resources, provides internal trainings on tribal engagement, and hosts the Commerce Tribal Advisory Committee. The committee, which meets annually, serves as a formal and regular means of communicating between Commerce and tribal partners. The office maintains a list of publicly available resources and agency funding opportunities for tribal communities.

Programmatic overlap

Outreach for Historically Underserved Community Grant Program

Commerce houses a new grant program that specifically supports outreach for aid in accessing public assistance programs. In 2021, the Legislature created the Outreach for Historically Underserved Communities Grants, appropriating $4 million for this program in fiscal year 2022 and $6 million in fiscal year 2023. These funds were designated for "grants to community organizations that serve historically disadvantaged populations to conduct outreach and assist community members in applying for state and federal assistance programs."

Commerce has awarded outreach grant funds to 25 community organizations in 17 counties. These organizations have contacted over 20,000 people through grant-funded outreach, and these interactions have generated over 4,900 outcomes.

Housing programs

Commerce administers a number of housing and homelessness assistance programs, including the Housing Trust Fund, the Office of Apple Health and Homes and Permanent Supportive Housing, the Office of Family and Adult Homelessness, and the Office of Homeless Youth.

Since 1986, the state's Housing Trust Fund has invested over $2 billion in capital funding and helped build or preserve more than 58,600 affordable housing units statewide. The Housing Trust Fund provides capital financing through loans or grants to affordable housing projects through annual competitive application cycles. Properties financed by the program can house people earning up to 80% of area median income, but most of these properties house households with special needs or incomes below 30% of area median income.

The Office of Apple Health and Homes and Permanent Supportive Housing administers the Apple Health and Homes Initiative and Commerce's other permanent supportive housing initiatives. The Apple Health and Homes Initiative is a multi-agency initiative that pairs healthcare services with housing resources for some of the state's most vulnerable residents. It provides capital and operating funding for acquiring or developing housing units, supportive services, rental subsidies and other permanent supportive housing assistance. This office also provides capital funding for new permanent supportive housing, operations and maintenance funding for existing permanent supportive housing developments, and rental assistance for people with behavioral health and other disabling conditions.

Both the Office of Family and Adult Homelessness and the Office of Homeless Youth fund community organizations that provide homelessness crisis services, street-level outreach, homelessness diversion, rental

assistance, residential programs, and other support services and community based initiatives. The Office of Homeless Youth funds over 100 community programs in 37 counties.

Low-Income Home Energy Assistance Program

The Low-Income Home Energy Assistance Program (LIHEAP) is a state-run but federally funded program provides energy assistance to households in Washington through a network of community action agencies and local partners, primarily assisting households by making an energy assistance grant directly to the energy provider on behalf of the eligible household. LIHEAP may also help repair or replace an unsafe, dysfunctional, and inoperative heating or cooling system in some situations. Households eligible for LIHEAP may also qualify to have their homes made more energy efficient through Commerce's weatherization programs.

LIHEAP assistance is available to qualifying households whose income is at or below 150% of the federal poverty line. Households apply to the LIHEAP program by scheduling an eligibility determination appointment with one of the local partners that Commerce works with to administer the program.

Each year, Commerce must submit an annual LIHEAP plan to the U.S. Department of Health and Human Services, which includes a description of planned outreach activities. These have historically included activities such as placing flyers or posters in local service offices, placing notices in media outlets, including inserts in utility billing notices, contacting prior-year LIHEAP recipients, providing LIHEAP information upon intake for other public assistance programs, and partnering with other public assistance program administrators.

Weatherization Programs

In addition to administering LIHEAP, providing energy assistance in the form of annual lump-sum payments to cover bill payments, Commerce also provides energy assistance in the form of weatherization assistance. Commerce runs several different weatherization programs, all of which center on funding home upgrades for eligible low-income households like added insulation that reduce heat loss and energy consumption. These programs are funded by dedicated allocations from the U.S. Department of Energy, the Bonneville Power Administration and Washington state, and waivers that transfer up to 25% of LIHEAP funding to weatherization assistance. Utility companies that sell gas and electric heat also provide matching funds for qualified low-income households.

General weatherization assistance is available to households whose income is at or below 200% of the federal poverty line, or 60% of state median income, whichever is greater. The Weatherization Plus Health program provides both weatherization assistance and upgrades that improve homes for people with asthma, and is available to households whose income is at or below 80% of area median income. The Home Rehabilitation Loan program funds deferred loans to rural, low-income households needing repairs and improvements on their primary residence to increase health, safety and durability, and is available to rural households whose income is at or below 200% of the federal poverty line.

Commerce contracts with local providers in all 39 counties to provide weatherization assistance to eligible households, and the Weatherization Plus Health program uses community health education partnerships for client recruitment, assessment, and intensive home education and follow-up.

Appendix S: DSHS outreach and community engagement

Background

The Department of Social and Health Services (DSHS) contracts with two organizations to conduct outreach and community engagement for the Supplemental Nutrition Assistance Program (SNAP): People for People and WithinReach.

These contractors coordinate several different services related to food assistance, including subcontracting with over 38 community organizations. These organizations include:

- Non-profits
- Community action agencies
- Food banks
- Health districts
- Call centers
- Senior service providers

These 38 subcontracted community organizations use their networks to conduct engagement and outreach activities for SNAP. These organizations primarily interface with SNAP clients by providing application assistance through Washington Connection, an online portal that helps Washington residents and businesses to services.

How DSHS coordinates with its statewide contractors

DSHS works with People for People and WithinReach to develop individual outreach plans for each of its 38 subcontractor organizations, which then are collected into annual state outreach plans that are submitted to the United States Department of Agriculture's Food and Nutrition Service (FNS). DSHS bases its state outreach plans on FNS templates and guidance, and the plans include a statement of need, project overviews, contractor budgets and staffing details. DSHS works with its 38 subcontractor organizations to ensure that individual outreach plans lead to data driven results.

Outreach plans include goals and performance metrics that DSHS tracks on a monthly basis to assess the performance of the agency's annual outreach plan. The specific outreach goals and performance metrics that DSHS tracks are based on the outreach activities listed in a particular outreach plan. For example, if one planned outreach activity was staffing exhibits or booths at community events, DSHS might track the number of community events attended, and the number of contacts made with community members at those events. In its outreach plan template, FNS encourages that goals be measureable, and numeric if possible, and that outreach goals focus on increasing SNAP participation.

In its annual SNAP outreach plan for fiscal year 2024, the New Mexico Human Services Department indicated that its primary outreach project would be partnering with a food bank that would provide application and recertification assistance, and distribute accurate, culturally relevant, bilingual and developmentally appropriate materials and information about the state SNAP program. The goal for this project was for New Mexicans who are eligible for SNAP to receive "accurate, culturally relevant, and developmentally appropriate information regarding SNAP in providing application and recertification assistance for those community members." The outreach plan detailed that the food bank would assess its performance of these activities

based on the state SNAP participation rate, number of individuals reached via outreach work, number of applications submitted, number of applicants that asked questions, and number of materials distributed.[114]

WithinReach reports that SNAP outreach partner organizations have fairly wide latitude within certain guidelines to develop their own outreach materials targeted to the populations that they serve, although some organizations lack the resources or the capacity to do this, relying on standardized materials from WithinReach and DSHS.

Outreach partner organizations report on their activities to People for People and WithinReach, and DSHS provides quarterly holdback payments to organizations that meet their performance goals, delaying the release of a portion of matching funds until subcontractors demonstrate progress towards meeting their performance goals. These holdback payments are designed to encourage subcontractor performance and have been implemented to align with federal guidance from FNS.

WithinReach regularly aims to recruit new partner organizations as SNAP subcontractors, although it reports that the biggest challenge to bringing on new partners is the federal funding structure. SNAP outreach is funded through a 50/50 match, so organizations that cannot meet the 50% funding obligation are effectively unable to participate as subcontractors.

WithinReach convenes quarterly Basic Food Education Forums to facilitate information-sharing and the wide dissemination of best practices among SNAP subcontractors. These forums present an opportunity to share information like programmatic changes that may affect outreach messaging, and success stories and strategies that subcontractor organizations can emulate to improve the efficacy of their outreach activities. DSHS indicates that these quarterly forums would be an excellent opportunity for the administrator of a statewide low-income energy assistance program to share information about the program, and direct SNAP outreach subcontractors to program materials that they could distribute. WithinReach has also hosted population-specific forums where subcontractors can share their experiences working with particular geographic or ethnic communities so that other organizations can learn ways to better reach these communities.

DSHS conducts specific consultation on the planning of the department's service programs with tribes and recognized American Indian Organizations per its Administrative Policy No. 07.01.

Coordination with Other Public Assistance Programs
DSHS indicates that its 38 SNAP outreach subcontractor organizations are able to bring informational materials about additional programs that may be relevant to SNAP clients to community events where these partner organizations are conducting SNAP outreach. Typically, these additional materials are made available by program administrators on the Department of Enterprise Services' fulfillment services web site. Outreach partner organizations can then request these materials through fulfillment services, and program administrators can track how many of their publications are requested. Program administrators pay the costs of printing and shipping these materials.

DSHS points to its ongoing collaboration with the Department of Health (DOH) SNAP Produce Match program as an example of the kind of information-sharing partnership that could be possible with a statewide low-income energy assistance program. The SNAP Produce Match program aims to incentivize SNAP clients to buy more fruits and vegetables by providing either coupons or discounts for buying at least $10 worth of

[114] New Mexico Human Services Department, "FY24 SNAP Outreach Plan," (2023), FFY24-NM-SNAP-Outreach-Plan.pdf (state.nm.us)

qualifying products at participating grocery stores. As part of its outreach for this program, DOH makes informational materials available to SNAP outreach partner organizations, which are then able to share these materials with their clients. A statewide low-income energy assistance program could follow a similar process, making informational materials available on the fulfillment services web site, where DSHS's 38 SNAP outreach subcontractors could then access and distribute them.

While SNAP outreach partner organizations could access and distribute outreach materials such as pamphlets for a statewide low-income energy assistance program, more involved outreach and enrollment activities would require a separate contract and funding.

Appendix T: Opportunities for partnership and lessons learned from Department of Children, Youth, and Families Outreach

The Department of Children, Youth, and Families (DCYF) is the lead agency for state-funded services that support children and families to build resilience and health, and to improve educational outcomes. DCYF accomplishes this by partnering with state and local agencies, tribes and other organizations in communities across the state of Washington. DCYF's focus is supporting children and families at their most vulnerable, giving them the tools they need to succeed.

Given this focus, there could be opportunities for DCYF to share information about a statewide low-income monthly energy bill assistance program through social media and other online channels. This would raise awareness about the program and inform households about how to get more information or enroll.

The implementation of outreach for DCYF programs, such as the Working Connections Child Care Program, provide examples of using community level outreach strategies to increase program participation in social service programs.

The Working Connections Child Care Program

The Working Connections Child Care Program provides subsidies for child care to eligible families while parents participate in activities like working or attending school. In addition to meeting Washington state residency and resource requirements, with some exceptions, families must make no more than 60% of state median income upon initial enrollment, or no more than 65% of state median income when re-applying in order to be eligible for child care subsidies.

While DCYF does have staff stationed throughout the state that participate in local activities and outreach, it conducts a significant amount of outreach with social media ads and mailers. DCYF contracts with several groups to distribute these materials. Its primary outreach partner is Child Care Aware of Washington.

Child Care Aware of Washington is a non-profit whose mission is to improve access to affordable and high quality child care. It has partnered with DCYF for decades, providing referral services in addition to advocacy and training.

DCYF makes decisions about the content and targeting of outreach messaging in consultation with its outreach partners. In a recent Working Connections Child Care outreach campaign, DCYF targeted outreach efforts to Yakima County, where there is a high number of eligible families but low program enrollment compared to the other parts of the state. DCYF assessed the efficacy of that campaign by looking at the number of new program applications, and it found an increase in new applications over the same time frame compared to the previous year.

Appendix U: Office of Superintendent of Public Instruction outreach and community engagement

Background

Migratory seasonal farmworker households face unique challenges accessing public assistance programs, including language barriers, social isolation, fear or mistrust of institutions, and frequently moving to follow crops. These challenges contribute to the negative economic, educational and health consequences that affect this group. A statewide low-income energy assistance program would intentionally incorporate design elements to mitigate these unique challenges, and leverage existing networks of state agencies and providers.

Migrant Education Program

The Office of the Superintendent of Public Instruction's Migrant Education Program (MEP) is a federally funded program created in 1965 that provides a variety of supplemental services for migratory children and their families to ensure migratory children have the same opportunities to achieve educational success as their peers. These supplemental services provide educational programs, supports and services, as well assistance in connecting with available health and other social services.

Washington's MEP is one of the largest by numbers in the country. During the 2020-2021 school year, over 30,000 students were eligible for the program, and over 15,000 received services. More than 2,600 students received services during the summer of 2021.[115] MEP uses a statewide network of recruitment teams to identify students that may be eligible for the program, which is active in over 60 school districts. The program works directly with four Education Service Districts, which provide support services for school districts in their regions, to provide technical assistance and coordinate the activities of district-level programs.

Once connected with district-level programs, migratory students can receive support such as help with connecting to public assistance programs, supplemental medical screening exams, transportation to and from medical appointments, and supplemental nutrition assistance. When connecting migratory students and families with public assistance programs, MEP generally refers families to the Department of Social and Health Services or another appropriate service provider, but in some circumstances where families have greater need, the program provides limited direct enrollment assistance.

Partnership with a statewide energy assistance program

According to MEP, both the network of recruitment teams and local educational agency program staff could be utilized to help spread information about a statewide low-income energy assistance program. With the appropriate information about eligibility criteria and the enrollment process, MEP staff could inform migratory students and families about an energy assistance program's existence and direct interested households to the program application.

Under this kind of partnership, it would be important for an energy assistance program administrator to provide regular communications to MEP staff about the program, and any relevant changes to eligibility criteria or

[115] Meta Associates, "2020-2021 Evaluation Report – Washington Migrant Education Program," (2022), Washington State Priority for Service Definition (ospi.k12.wa.us)

enrollment processes. This would ensure that the energy program would be top of mind for MEP staff, and that the information they provide migratory students and families would be current.

MEP also indicated there are several important design elements that would make such a program more accessible to migratory seasonal farmworker households. Chief among these elements are language access, documentation requirements that are not overly burdensome, and multiple application methods. A waiver or separate application stream for migratory seasonal farmworker households could also make the application process easier.

Public charge considerations

According to MEP, it would also be important for communications to migratory seasonal farmworker households about a statewide low-income energy assistance program to address public charge concerns. The Department of Homeland Security can deny applications for a visa or change in immigration status from noncitizens on the basis that they are likely to become a public charge, defined as becoming primarily dependent on the government for subsistence.116 The public charge inadmissibility rules were modified in 2019 and 2022. MEP indicates that concern and confusion over these rules is common among migratory households in Washington, and in some cases prevents families from accessing public assistance, even if their concerns are unfounded. A 2022 survey by the Urban Institute found that one in four adults in families with mixed immigration status avoiding accessing public assistance programs because of green card concerns.

The most recent change to public charge inadmissibility rules clarified that being primarily dependent on the government for subsistence is demonstrated either by receiving public cash assistance for income maintenance, or long-term institutionalization at government expense. Public cash assistance for income maintenance is defined as Supplemental Security Income, cash assistance for income maintenance under the Temporary Assistance for Needy Families program, or state, tribal or local cash benefit programs for income maintenance. Other kinds of benefits, like Supplemental Nutrition Assistance Program or housing benefits, are explicitly excluded for the purposes of making public charge determinations.117

A statewide energy assistance program would intentionally develop clear communications that program participation would not be considered for the purposes of making public charge determinations, and would not impact the ability for participants to change their immigration status.

[116,39] Federal Register, "Public Charge Ground of Inadmissibility," (2022), Federal Register :: Public Charge Ground of Inadmissibility

Appendix V: Employment Security Division outreach and community engagement case study

The beginning of the Paid Family and Medical Leave program provides an instructive case study for how a statewide low-income energy assistance program might approach outreach, including pre-launch and ongoing efforts. Since this program was new, it was crucial to raise awareness well before launch to ensure that people who needed paid leave were aware of eligibility, benefits and how to apply, and so employers and employees had sufficient time to understand how premium payments would be structured. A low-income energy assistance program would likely encounter similar challenges and opportunities related to ensuring that potential clients, community organizations and utilities have accurate and thorough information, both prior to and following program launch.

In 2017, the Legislature directed the Employment Security Department (ESD) to create and administer a new paid leave program for employees experiencing events like the birth of a child or a serious health condition.[118] Premiums to fund the program started on January 1, 2019, and paid leave benefits became available January 1, 2020.

The Legislature mandated that ESD conduct outreach for the program. It further required that program information be available in English and other primary languages, including Spanish, Vietnamese, Cambodian, Laotian and Chinese.

ESD's outreach for Paid Family and Medical leave began 18 to 24 months before benefits were scheduled to begin, and were ongoing by mid-2018. Outreach targeted employers, since premium payments began one year before benefits began. Having outreach staff in workplaces speaking with employers presented opportunities to communicate with employees about program eligibility, benefit accessibility, and other aspects of the program. Staff also conducted community presentations and webinars, solicited public input, and utilized mass communication. ESD employed two to three dedicated employees to conduct this outreach, although at some points up to seven communications employees and several contractors supported outreach efforts.

More direct community outreach began about six months before the launch of the Paid Family and Medical Leave program. Integrating with existing community outreach networks and utilizing trusted messengers were key elements of outreach for Paid Family and Medical Leave. When working with trusted messengers and community partners, ESD found that, given the program was entirely new, significant technical assistance was required to ensure that outreach partners could provide accurate and timely information on elements, such as program eligibility and benefits access.

The Perigee Fund, an organization focused on early childhood health and wellbeing, undertook an initiative from 2020 to 2023 to expand Paid Family and Medical Leave enrollment and information sharing with communities that have historically faced systemic barriers to accessing social services. Perigee's mission is to invest in policy and programmatic changes that support families from pregnancy through early childhood, so ensuring that the rollout of Paid Family and Medical Leave was equitably implemented aligned with Perigee's priorities.

Perigee independently decided to invest grant funding in Washington to mitigate observed rollout challenges experienced by other states that created paid family and medical leave programs, particularly concerning

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[118] Washington State Legislature, "SSB 5975," (2017), 5975-S.SL.pdf (wa.gov)

access for groups that have historically lacked or underused paid leave. To accomplish this goal, Perigee awarded outreach and enrollment grants to community partners in Pierce and Yakima counties, with designated "convener" organizations providing leadership and other support to additional partner organizations in their regions.

Through grant funding, community partner organizations integrated information about Paid Family and Medical Leave into their existing practices in different ways, including making informational materials available in organization spaces, incorporating program information into regular communications with clients, and training staff on program details.

A cost-benefit analysis of Perigee's outreach and enrollment grant initiative found that approximately $1.8 million in grant funding contributed to an estimated $13.27 million in wage replacement for Paid Family and Medical Leave participants.

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