

BEFORE THE
MANITOBA PUBLIC UTILITY BOARD

Manitoba Hydro :
2014/15 and 2015/16 General :
Rate Application : Docket No. _____
:

APPENDICES TO
DIRECT TESTIMONY AND EXHIBITS OF
ROGER D. COLTON

ON BEHALF OF
GREEN ACTION CENTRE (GAC)

April 24, 2015

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Appendix A

ROGER D. COLTON

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EDUCATION:

J.D. (Order of the Coif), University of Florida (1981)

M.A. (Economics), McGregor School, Antioch University (1993)

B.A. Iowa State University (1975) (journalism, political science, speech)

PROFESSIONAL EXPERIENCE:

Fisher, Sheehan and Colton, Public Finance and General Economics: 1985 - present.

As a co-founder of this economics consulting partnership, Colton provides services in a variety of areas, including: regulatory economics, poverty law and economics, public benefits, fair housing, community development, energy efficiency, utility law and economics (energy, telecommunications, water/sewer), government budgeting, and planning and zoning.

Colton has testified in state and federal courts in the United States and Canada, as well as before regulatory and legislative bodies in more than three dozen states. He is particularly noted for creative program design and implementation within tight budget constraints.

National Consumer Law Center (NCLC): 1986 - 1994

As a staff attorney with NCLC, Colton worked on low-income energy and utility issues. He pioneered cost-justifications for low-income affordable energy rates, as well as developing models to quantify the non-energy benefits (*e.g.*, reduced credit and collection costs, reduced working capital) of low-income energy efficiency. He designed and implemented low-income affordable rate and fuel assistance programs across the country. Colton was charged with developing new practical and theoretical underpinnings for solutions to low-income energy problems.

Community Action Research Group (CARG): 1981 - 1985

As staff attorney for this non-profit research and consulting organization, Colton worked primarily on energy and utility issues. He provided legal representation to low-income persons on public utility issues; provided legal and technical assistance to consumer and labor organizations; and provided legal and technical assistance to a variety of state and local governments nationwide on natural gas, electric, and telecommunications issues. He routinely appeared as an expert witness before regulatory agencies and legislative committees regarding energy and telecommunications issues.

PROFESSIONAL AFFILIATIONS:

Coordinator: BelmontBudget.org (Belmont's Community Budget Forum)
Coordinator: Belmont Affordable Shelter Fund (BASF)
Chair: Belmont Solar Initiative Oversight Committee
Co-Chair: Belmont Energy Committee
Member: Massachusetts Municipal Energy Group (Mass Municipal Association)
Past Chair: Housing Work Group, Belmont (MA) Comprehensive Planning Process
Past Member: Board of Directors, Belmont Housing Trust, Inc.
Past Chair: Waverley Square Fire Station Re-use Study Committee (Belmont MA)
Past Member: Belmont (MA) Energy and Facilities Work Group
Past Member: Belmont (MA) Uplands Advisory Committee
Past Member: Advisory Board: Fair Housing Center of Greater Boston.
Past Chair: Fair Housing Committee, Town of Belmont (MA)
Past Member: Aggregation Advisory Committee, New York State Energy Research and Development Authority.
Past Member: Board of Directors, Vermont Energy Investment Corporation.
Past Member: Board of Directors, National Fuel Funds Network
Past Member: Board of Directors, Affordable Comfort, Inc. (ACI)
Past Member: National Advisory Committee, U.S. Department of Health and Human Services, Administration for Children and Families, Performance Goals for Low-Income Home Energy Assistance.
Past Member: Editorial Advisory Board, International Library, *Public Utility Law Anthology*.
Past Member: ASHRAE Guidelines Committee, GPC-8, *Energy Cost Allocation of Comfort HVAC Systems for Multiple Occupancy Buildings*
Past Member: National Advisory Committee, U.S. Department of Housing and Urban Development, Calculation of Utility Allowances for Public Housing.
Past Member: National Advisory Board: Energy Financing Alternatives for Subsidized Housing, New York State Energy Research and Development Authority.

PROFESSIONAL ASSOCIATIONS:

National Association of Housing and Redevelopment Officials (NAHRO)
Association for Enterprise Opportunity (AEO)
Iowa State Bar Association

Energy Bar Association
Association for Institutional Thought (AFIT)
Association for Evolutionary Economics (AEE)
Society for the Study of Social Problems (SSSO)
International Society for Policy Studies
Association for Social Economics

BOOKS

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Colton, *et al.*, *Tenants' Rights to Utility Service*, National Consumer Law Center: Boston (1994).

Colton, *The Regulation of Rural Electric Cooperatives*, National Consumer Law Center: Boston (1992).

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Colton (2010). *Home Energy Affordability in Manitoba: A Low-Income Affordability Program for Manitoba Hydro*, prepared for Resource Conservation of Manitoba, Winnipeg (MAN).

Colton (2009). *Mirror, Mirror on the Wall: How Well Does Belmont's Town Meeting Reflect the Community at Large*, prepared for Fisher, Sheehan & Colton, Public Finance and General Economics, Belmont (MA).

Colton (2009). *An Outcomes Planning Approach to Serving TPU Low-Income Customers*, prepared for Tacoma Public Utilities, Tacoma (WA).

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Roger Colton (2009). *The Earned Income Tax Credit (EITC) as “Energy Assistance” in Pennsylvania*, prepared for Pennsylvania Utility Law Project (PULP).

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Colton (2009). *Energy Efficient Utility Allowances as a Usage Reduction Tool in Pennsylvania*, prepared for Pennsylvania Utility Law Project, Harrisburg (PA).

Colton (2009). *Home Energy Consumption Expenditures by Income (Pennsylvania)*, prepared for Pennsylvania Utility Law Project, Harrisburg (PA).

Colton (2009). *The Contribution of Utility Bills to the Unaffordability of Low-Income Rental Housing in Pennsylvania*, prepared for Pennsylvania Utility Law Project, Harrisburg (PA).

Colton (2009). *The Integration of Federal LIHEAP Benefits with Ratepayer-Funded Percentage of Income Payment Programs (PIPPs): Legal and Policy Questions Involving the Distribution of Benefits*, prepared for Pennsylvania Office of Consumer Advocate, Harrisburg (PA).

Colton (2008). *Home Energy Affordability in Indiana: Current Needs and Future Potentials*, prepared for Indiana Community Action Association.

Colton (2008). *Public Health Outcomes Associated with Energy Poverty: An Analysis of Behavioral Risk Factor Surveillance System (BRFSS) Data from Iowa*, prepared for Iowa Department of Human Rights.

Colton (2008). *Indiana Billing and Collection Reporting: Natural Gas and Electric Utilities: 2007*, prepared for Coalition to Keep Indiana Warm.

Colton (2008). *Inverted Block Tariffs and Universal Lifeline Rates: Their Use and Usability in Delivering Low-Income Electric Rate Relief*, prepared for Hydro-Quebec.

Colton (2007). *Best Practices: Low-Income Affordability Programs, Articulating and Applying Rating Criteria*, prepared for Hydro-Quebec.

Colton (2007). *An Outcome Evaluation of Indiana’s Low-Income Rate Affordability Programs*, performed for Citizens Gas & Coke Utility, Vectren Energy Delivery, Northern Indiana Public Service Company.

Colton (2007). *A Multi-state Study of Low-Income Programs*, in collaboration with Apprise, Inc., prepared for multiple study sponsors.

Colton (2007). *The Law and Economics of Determining Hot Water Energy Use in Calculating Utility Allowances for Public and Assisted Housing*.

Colton (2007). *Comments of Belmont Housing Trust on Energy Conservation Standards for Residential Furnaces and Boilers*, Belmont Housing Trust (Belmont MA).

Colton (2006). *Indiana Billing and Collection Reporting: Natural Gas and Electric Utilities: 2006*, prepared for Coalition to Keep Indiana Warm.

Colton (2006). *Home Energy Affordability in Maryland: Necessary Regulatory and Legislative Actions*, prepared for the Maryland Office of Peoples Counsel.

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COLTON EXPERIENCE AS EXPERT WITNESS

1988 – PRESENT

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I/M/O PPL Utilities	Office of Consumer Advocate	R-2015-2469275	Rate design / customer service	Pennsylvania	15
I/M/O Columbia Gas Company	Office of Consumer Advocate	R-2015-2468056	Rate design / customer service	Pennsylvania	15
I/M/O PECO Energy Company	Office of Consumer Advocate	R-2015-2468981	Rate design / customer service	Pennsylvania	15
I/M/O Philadelphia Gas Works	Office of Consumer Advocate	P-2014-2459362	Demand Side Management	Pennsylvania	15
I/M/O SBG Management v. Philadelphia Gas Works	SBG Management	C-2012-2308454	Customer service	Pennsylvania	15
I/M/O Manitoba Hydro	Resource Action Centre		Low-income affordability	Manitoba	15
I/M/O FirstEnergy Companies (Met Ed, WPP, Penelec, Penn Power)	Office of Consumer Advocate	R-2014-2428742 (8743, 8744, 8745)	Rate design / customer service / storm communications	Pennsylvania	14
I/M/O Xcel Energy Company	Energy CENTS Coalition	E002/GR-13-868	Rate design / energy conservation	Minnesota	14
I/M/O Peoples Gas Light and Coke Company / North Shore Gas	Office of Attorney General	14-0224 / 14--0225	Rate design / customer service	Illinois	14
I/M/O Columbia Gas of Pennsylvania	Office of Consumer Advocate	R-2014-2406274	Rate design / customer service	Pennsylvania	14
I/M/O Duquesne Light Company Rates	Office of Consumer Advocate	R-2013-2372129	Rate design / customer service / storm communications	Pennsylvania	13
I/M/O Duquesne Light Company Universal Service	Office of Consumer Advocate	M-2013-2350946	Low-income program design	Pennsylvania	13
I/M/O Peoples-TWP	Office of Consumer Advocate	P-2013-2355886	Low-income program design / rate design	Pennsylvania	13

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I/M/O PECO CAP Shopping Plan	Office of Consumer Advocate	P-2013-2283641	Retail shopping	Pennsylvania	13
I/M/O PECO Universal Service Programs	Office of Consumer Advocate	M-201202290911	Low-income program design	Pennsylvania	13
I/M/O Privacy of Consumer Information	Legal Services Advocacy Project	CI-12-1344	Privacy of SSNs & consumer information	Minnesota	13
I/M/O Atlantic City Electric Company	Division of Rate Counsel	BPU-12121071	Customer service / Storm communications	New Jersey	13
I/M/O Jersey Central Power and Light Company	Division of Rate counsel	BPU-12111052	Customer service / Storm communications	New Jersey	13
I/M/O Columbia Gas Company	Office of Consumer Advocate	R-2012-2321748	Universal service	Pennsylvania	13
I/M/O Public Service Company of Colorado Low-Income Program Design	Xcel Energy d/b/a PSCo	12A--EG	Low-income program design / cost recovery	Colorado	12
I/M/O Philadelphia Water Department.	Philadelphia Public Advocate	No. Docket No.	Customer service	Philadelphia	12
I/M/O PPL Electric Power Corporation	Office of Consumer Advocate	R-2012-2290597	Rate design / low-income programs	Pennsylvania	12
I/M/O Peoples Natural Gas Company	Office of Consumer Advocate	R-2012-2285985	Rate design / low-income programs	Pennsylvania	12
I/M/O Merger of Constellation/Exelon	Office of Peoples Counsel	CASE 9271	Customer Service	Maryland	11
I/M/O Duke Energy Carolinas	North Carolina Justice Center	E-7, SUB-989	Customer service/low-income rates	North Carolina	11
Re. Duke Energy/Progress Energy merger	NC Equal Justice foundation	E-2, SUB 998	Low-income merger impacts	North Carolina	11
Re. Atlantic City Electric Company	Division of Rate Counsel	ER1186469	Customer Service	New Jersey	11
Re. Camelot Utilities	Office of Attorney General	11-0549	Rate shock	Illinois	11
Re. UGI—Central Penn Gas	Office of Consumer Advocate	R-2010-2214415	Low-income program design/cost recovery	Pennsylvania	11
Re. National Fuel Gas	Office of Consumer Advocate	M-2010-2192210	Low-income program cost recovery	Pennsylvania	11
Re. Philadelphia Gas Works	Office of Consumer Advocate	P-2010-2178610	Program design	Pennsylvania	11
Re. PPL	Office of Consumer Advocate	M-2010-2179796	Low-income program cost recovery	Pennsylvania	11
Re. Columbia Gas Company	Office of Consumer Advocate	R-2010-2215623	Rate design/Low-income program cost recovery	Pennsylvania	11

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Crowder et al. v. Village of Kauffman	Crowder (plaintiffs)	3:09-CV-02181-M	Section 8 utility allowances	Texas Fed Court	11
I/M/O Peoples Natural Gas Company.	Office of Consumer Advocate	T-2010-220172	Low-income program design/cost recovery	Pennsylvania	11
I/M/O Commonwealth Edison	Office of Attorney General	10-0467	Rate design/revenue requirement	Illinois	10
I/M/O National Grid d/b/a Energy North	NH Legal Assistance	DG-10-017	Rate design/revenue requirement	New Hampshire	10
I/M/O Duquesne Light Company	Office of Consumer Advocate	R-2010-2179522	Low-income program cost recovery	Pennsylvania	10
I/M/O Avista Natural Gas Corporation	The Opportunity Council	UE-100467	Low-income assistance/rate design	Washington	10
I/M/O Manitoba Hydro	Resource Conservation Manitoba (RCM)	CASE NO. 17/10	Low-income program design	Manitoba	10
I/M/O TW Phillips	Office of Consumer Advocate	R-2010-2167797	Low-income program cost recovery	Pennsylvania	10
I/M/O PECO Energy—Gas Division	Office of Consumer Advocate	R-2010-2161592	Low-income program cost recovery	Pennsylvania	10
I/M/O PECO Energy—Electric Division	Office of Consumer Advocate	R-2010-2161575	Low-income program cost recovery	Pennsylvania	10
I/M/O PPL Energy	Office of Consumer Advocate	R-2010-2161694	Low-income program cost recovery	Pennsylvania	10
I/M/O Columbia Gas Company	Office of Consumer Advocate	R-2009-2149262	Low-income program design/cost recovery	Pennsylvania	10
I/M/O Atlantic City Electric Company	Office of Rate Council	R09080664	Customer service	New Jersey	10
I/M/O Philadelphia Gas Works	Office of Consumer Advocate	R-2009-2139884	Low-income program cost recovery	Pennsylvania	10
I/M/O Philadelphia Gas Works	Office of Consumer Advocates	R-2009-2097639	Low-income program design	Pennsylvania	10
I/M/O Xcel Energy Company	Xcel Energy Company (PSCo)	085-146G	Low-income program design	Colorado	09
I/M/O Atmos Energy Company	Atmos Energy Company	09AL-507G	Low-income program funding	Colorado	09
I/M/O New Hampshire CORE Energy Efficiency Programs	New Hampshire Legal Assistance	D-09-170	Low-income efficiency funding	New Hampshire	09
I/M/O Public Service Company of New Mexico (electric)	Community Action of New Mexico	08-00273-UT	Rate Design	New Mexico	09
I/M/O UGI Pennsylvania Natural Gas Company (PNG)	Office of Consumer Advocate	R-2008-2079675	Low-income program	Pennsylvania	09

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I/M/O UGI Central Penn Gas Company (CPG)	Office of Consumer Advocate	R-2008-2079660	Low-income program	Pennsylvania	09
I/M/O PECO Electric (provider of last resort)	Office of Consumer Advocate	R-2008-2028394	Low-income program	Pennsylvania	08
I/M/O Equitable Gas Company	Office of Consumer Advocate	R-2008-2029325	Low-income program	Pennsylvania	08
I/M/O Columbia Gas Company	Office of Ohio Consumers' Counsel	08-072-GA-AIR	Rate design	Ohio	08
I/M/O Dominion East Ohio Gas Company	Office of Ohio Consumers' Counsel	07-829-GA-AIR	Rate design	Ohio	08
I/M/O Vectren Energy Delivery Company	Office of Ohio Consumers' Counsel	07-1080-GA-AIR	Rate design	Ohio	08
I/M/O Public Service Company of North Carolina	NC Department of Justice	G-5, SUB 495	Rate design	North Carolina	08
I/M/O Piedmont Natural Gas Company	NC Department of Justice	G-9, SUB 550	Rate design	North Carolina	08
I/M/O National Grid	New Hampshire Legal Assistance	DG-08-009	Low-income rate assistance	New Hampshire	08
I/M/O EmPower Maryland	Office of Peoples Counsel	PC-12	Low-income energy efficiency	Maryland	08
I/M/O Duke Energy Carolinas Save-a-Watt Program	NC Equal Justice Foundation	E-7, SUB 831	Low-income energy efficiency	North Carolina	08
I/M/O Zia Natural Gas Company	Community Action New Mexico	08-00036-UT	Low-income/low-use rate design	New Mexico	08
I/M/O Universal Service Fund Support for the Affordability of Local Rural Telecomm Service	Office of Consumer Advocate	I-0004010	Telecomm service affordability	Pennsylvania	08
I/M/O Philadelphia Water Department	Public Advocate	No Docket No.	Credit and Collections	Philadelphia	08
I/M/O Portland General Electric Company	Community Action--Oregon	UE-197	General rate case	Oregon	08
I/M/O Philadelphia Electric Company (electric)	Office of Consumer Advocate	M-00061945	Low-income program	Pennsylvania	08
I/M/O Philadelphia Electric Company (gas)	Office of Consumer Advocate	R-2008-2028394	Low-income program	Pennsylvania	08
I/M/O Columbia Gas Company	Office of Consumer Advocate	R-2008-2011621	Low-income program	Pennsylvania	08
I/M/O Public Service Company of New Mexico	Community Action New Mexico	08-00092-UT	Fuel adjustment clause	New Mexico	08
I/M/O Petition of Direct Energy for Low-Income Aggregation	Office of Peoples Counsel	CASE 9117	Low-income electricity aggregation	Maryland	07

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I/M/O Office of Consumer Advocate et al. v. Verizon and Verizon North	Office of Consumer Advocate	C-20077197	Lifeline telecommunications rates	Pennsylvania	07
I/M/O Pennsylvania Power Company	Office of Consumer Advocate	P-00072437	Low-income program	Pennsylvania	07
I/M/O National Fuel Gas Distribution Corporation	Office of Consumer Advocate	M-00072019	Low-income program	Pennsylvania	07
I/M/O Public Service of New Mexico--Electric	Community Action New Mexico	07-00077-UT	Low-income programs	New Mexico	07
I/M/O Citizens Gas/NIPSCO/Vectren for Universal Service Program	Citizens Gas & Coke Utility/Northern Indiana Public Service/Vectren Energy	CASE 43077	Low-income program design	Indiana	07
I/M/O PPL Electric	Office of Consumer Advocate	R-00072155	Low-income program	Pennsylvania	07
I/M/O Section 15 Challenge to NSPI Rates	Energy Affordability Coalition	P-886	Discrimination in utility regulation	Nova Scotia	07
I/M/O Philadelphia Gas Works	Office of Consumer Advocate	R-00049157	Low-income and residential collections	Pennsylvania	07
I/M/O Equitable Gas Company	Office of Consumer Advocate	M-00061959	Low-income program	Pennsylvania	07
I/M/O Public Service Company of New Mexico	Community Action of New Mexico	Case No. 06-000210-UT	Late charges / winter moratorium / decoupling	New Mexico	06
I/M?O Verizon Massachusetts	ABCD	Case NO. DTE 06-26	Late charges	Massachusetts	06
I/M/O Section 11 Proceeding, Energy Restructuring	Office of Peoples Counsel	PC9074	Low-income needs and responses	Maryland	06
I/M/O Citizens Gas/NIPSCO/Vectren for Univ. Svc. Program	Citizens Gas & Coke Utility/Northern Indiana Public Service/Vectren Energy	Case No. 43077	Low-income program design	Indiana	06
I/M/O Public Service Co. of North Carolina	North Carolina Attorney General/Dept. of Justice	G-5, Sub 481	Low-income energy usage	North Carolina	06
I/M/O Electric Assistance Program	New Hampshire Legal Assistance	DE 06-079	Electric low-income program design	New Hampshire	06
I/M/O Verizon Petition for Alternative Regulation	New Hampshire Legal Assistance	DM-06-072	Basic local telephone service	New Hampshire	06
I/M/O Pennsylvania Electric Co/Metropolitan Edison Co.	Office of Consumer Advocate	N/A	Universal service cost recovery	Pennsylvania	06
I/M/O Duquesne Light Company	Office of Consumer Advocates	R-00061346	Universal service cost recovery	Pennsylvania	06

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I/M/O Natural Gas DSM Planning	Low-Income Energy Network	EB-2006-0021	Low-income gas DSM program.	Ontario	06
I/M/O Union Gas Co.	Action Centre for Tenants Ontario (ACTO)	EB-2005-0520	Low-income program design	Ontario	06
I/M/O Public Service of New Mexico merchant plant	Community Action New Mexico	05-00275-UT	Low-income energy usage	New Mexico	06
I/M/O Customer Assistance Program design and cost recovery	Office of Consumer Advocate	M-00051923	Low-income program design	Pennsylvania	06
I/M/O NIPSCO Proposal to Extend Winter Warmth Program	Northern Indiana Public Service Company	Case 42927	Low-income energy program evaluation	Indiana	05
I/M/O Piedmont Natural Gas	North Carolina Attorney General/Dept. of Justice	G-9, Sub 499	Low-income energy usage	North Carolina	05
I/M/O PSEG merger with Exelon Corp.	Division of Ratepayer Advocate	EM05020106	Low-income issues	New Jersey	05
Re. Philadelphia Water Department	Public Advocate	No docket number	Water collection factors	Philadelphia	05
I/M/O statewide natural gas universal service program	New Hampshire Legal Assistance	N/A	Universal service	New Hampshire	05
I/M/O Sub-metering requirements for residential rental properties	Tenants Advocacy Centre of Ontario	EB-2005-0252	Sub-metering consumer protections	Ontario	05
I/M/O National Fuel Gas Distribution Corp.	Office of Consumer Advocate	R-00049656	Universal service	Pennsylvania	05
I/M/O Nova Scotia Power, Inc.	Dalhousie Legal Aid Service	NSUARB-P-881	Universal service	Nova Scotia	04
I/M/O Lifeline Telephone Service	National Ass'n State Consumer Advocates (NASUCA)	WC 03-109	Lifeline rate eligibility	FCC	04
Mackay v. Verizon North	Office of Consumer Advocate	C20042544	Lifeline rates—vertical services	Pennsylvania	04
I/M/O PECO Energy	Office of Consumer Advocate	N/A	Low-income rates	Pennsylvania	04
I/M/O Philadelphia Gas Works	Office of Consumer Advocate	P00042090	Credit and collections	Pennsylvania	04
I/M/O Citizens Gas & Coke/Vectren	Citizens Action Coalition of Indiana	Case 42590	Universal service	Indiana	04
I/M/O PPL Electric Corporation	Office of Consumer Advocate	R00049255	Universal service	Pennsylvania	04

CASE NAME	CLIENT NAME	Docket No. (if available)	TOPIC	JURIS.	YEAR
I/M/O Consumers New Jersey Water Company	Division of Ratepayer Advocate	N/A	Low-income water rate	New Jersey	04
I/M/O Washington Gas Light Company	Office of Peoples Counsel	Case 8982	Low-income gas rate	Maryland	04
I/M/O National Fuel Gas	Office of Consumer Advocate	R-00038168	Low-income program design	Pennsylvania	03
I/M/O Washington Gas Light Company	Office of Peoples Counsel	Case 8959	Low-income gas rate	Maryland	03
Golden v. City of Columbus	Helen Golden	C2-01-710	ECOA disparate impacts	Ohio	02
Huegel v. City of Easton	Phyllis Huegel	00-CV-5077	Credit and collection	Pennsylvania	02
I/M/O Universal Service Fund	Public Utility Commission staff	N/A	Universal service funding	New Hampshire	02
I/M/O Philadelphia Gas Works	Office of Consumer Advocate	M-00021612	Universal service	Pennsylvania	02
I/M/O Washington Gas Light Company	Office of Peoples Counsel	Case 8920	Rate design	Maryland	02
I/M/O Consumers Illinois Water Company	Illinois Citizens Utility Board	02-155	Credit and collection	Illinois	02
I/M/O Public Service Electric & Gas Rates	Division of Ratepayer Advocate	GR01050328	Universal service	New Jersey	01
I/M/O Pennsylvania-American Water Company	Office of Consumer Advocate	R-00016339	Low-income rates and water conservation	Pennsylvania	01
I/M/O Louisville Gas & Electric Prepayment Meters	Kentucky Community Action Association	200-548	Low-income energy	Kentucky	01
I/M/O NICOR Budget Billing Plan Interest Charge	Cook County State's Attorney	01-0175	Rate Design	Illinois	01
I/M/O Rules Re. Payment Plans for High Natural Gas Prices	Cook County State's Attorney	01-0789	Budget Billing Plans	Illinois	01
I/M/O Philadelphia Water Department	Office of Public Advocate	No docket number	Credit and collections	Philadelphia	01
I/M/O Missouri Gas Energy	Office of Peoples Counsel	GR-2001-292	Low-income rate relief	Missouri	01
I/M/O Bell Atlantic--New Jersey Alternative Regulation	Division of Ratepayer Advocate	T001020095	Telecommunications universal service	New Jersey	01
I/M/O Entergy Merger	Low-Income Intervenors	2000-UA925	Consumer protections	Mississippi	01
I/M/O T.W. Phillips Gas and Oil Co.	Office of Consumer Advocate	R00994790	Ratemaking of universal service costs.	Pennsylvania	00

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I/M/O Peoples Natural Gas Company	Office of Consumer Advocate	R-00994782	Ratemaking of universal service costs.	Pennsylvania	00
I/M/O UGI Gas Company	Office of Consumer Advocate	R-00994786	Ratemaking of universal service costs.	Pennsylvania	00
I/M/O PFG Gas Company	Office of Consumer Advocate	R00994788	Ratemaking of universal service costs.	Pennsylvania	00
Armstrong v. Gallia Metropolitan Housing Authority	Equal Justice Foundation	2:98-CV-373	Public housing utility allowances	Ohio	00
I/M/O Bell Atlantic--New Jersey Alternative Regulation	Division of Ratepayer Advocate	T099120934	Telecommunications universal service	New Jersey	00
I/M/O Universal Service Fund for Gas and Electric Utilities	Division of Ratepayer Advocate	EX00200091	Design and funding of low-income programs	New Jersey	00
I/M/O Consolidated Edison Merger with Northeast Utilities	Save Our Homes Organization	DE 00-009	Merger impacts on low-income	New Hampshire	00
I/M/O UtiliCorp Merger with St. Joseph Light & Power	Missouri Dept. of Natural Resources	EM2000-292	Merger impacts on low-income	Missouri	00
I/M/O UtiliCorp Merger with Empire District Electric	Missouri Dept. of Natural Resources	EM2000-369	Merger impacts on low-income	Missouri	00
I/M/O PacifiCorp	The Opportunity Council	UE-991832	Low-income energy affordability	Washington	00
I/M/O Public Service Co. of Colorado	Colorado Energy Assistance Foundation	99S-609G	Natural gas rate design	Colorado	00
I/M/O Avista Energy Corp.	Spokane Neighborhood Action Program	UE9911606	Low-income energy affordability	Washington	00
I/M/O TW Phillips Energy Co.	Office of Consumer Advocate	R-00994790	Universal service	Pennsylvania	00
I/M/O PECO Energy Company	Office of Consumer Advocate	R-00994787	Universal service	Pennsylvania	00
I/M/O National Fuel Gas Distribution Corp.	Office of Consumer Advocate	R-00994785	Universal service	Pennsylvania	00
I/M/O PFG Gas Company/Northern Penn Gas	Office of Consumer Advocate	R-00005277	Universal service	Pennsylvania	00
I/M/O UGI Energy Company	Office of Consumer Advocate	R-00994786	Universal service	Pennsylvania	00
Re. PSCO/NSP Merger	Colorado Energy Assistance Foundation	99A-377EG	Merger impacts on low-income	Colorado	99 - 00

CASE NAME	CLIENT NAME	Docket No. (if available)	TOPIC	JURIS.	YEAR
I/M/O Peoples Gas Company	Office of Consumer Advocate	R-00994782	Universal service	Pennsylvania	99
I/M/O Columbia Gas Company	Office of Consumer Advocate	R-00994781	Universal service	Pennsylvania	99
I/M/O PG Energy Company	Office of Consumer Advocate	R-00994783	Universal service	Pennsylvania	99
I/M/O Equitable Gas Company	Office of Consumer Advocate	R-00994784	Universal service	Pennsylvania	99
Allerruzzo v. Klarchek	Barlow Allerruzzo	N/A	Mobile home fees and sales	Illinois	99
I/M/O Restructuring New Jersey's Natural Gas Industry	Division of Ratepayer Advocate	GO99030123	Universal service	New Jersey	99
I/M/O Bell Atlantic Local Competition	Public Utility Law Project	P-00991648	Lifeline telecommunications rates	Pennsylvania	99
I/M/O Merger Application for SBC and Ameritech Ohio	Edgemont Neighborhood Association	N/A	Merger impacts on low-income consumers	Ohio	98 - 99
Davis v. American General Finance	Thomas Davis	N/A	Damages in "loan flipping" case	Ohio	98 - 99
Griffin v. Associates Financial Service Corp.	Earlie Griffin	N/A	Damages in "loan flipping" case	Ohio	98 - 99
I/M/O Baltimore Gas and Electric Restructuring Plan	Maryland Office of Peoples Counsel	Case No. 8794	Consumer protection/basic generation service	Maryland	98 - 99
I/M/O Delmarva Power and Light Restructuring Plan	Maryland Office of Peoples Counsel	Case No. 8795	Consumer protection/basic generation service	Maryland	98 - 99
I/M/O Potomac Electric Power Co. Restructuring Plan	Maryland Office of Peoples Counsel	Case No. 8796	Consumer protection/basic generation service	Maryland	98 - 99
I/M/O Potomac Edison Restructuring Plan	Maryland Office of Peoples Counsel	Case No. 8797	Consumer protection/basic generation service	Maryland	98 - 99
VMHOA v. LaPierre	Vermont Mobile Home Owners Association	N/A	Mobile home tying	Vermont	98
Re. Restructuring Plan of Virginia Electric Power	VMH Energy Services, Inc.	PUE960296	Consumer protection/basic generation service	Virginia	98
Mackey v. Spring Lake Mobile Home Estates	Timothy Mackey	N/A	Mobile home fees	State ct: Illinois	98

CASE NAME	CLIENT NAME	Docket No. (if available)	TOPIC	JURIS.	YEAR
Re. Restructuring Plan of Atlantic City Electric	New Jersey Division of Ratepayer Advocate	E097070457	Low-income issues	New Jersey	97-98
Re. Restructuring Plan of Jersey Central Power & Light	New Jersey Division of Ratepayer Advocate	E097070466	Low-income issues	New Jersey	97-98
Re. Restructuring Plan of Public Service Electric & Gas	New Jersey Division of Ratepayer Advocate	E097070463	Low-income issues	New Jersey	97-98
Re. Restructuring Plan of Rockland Electric	New Jersey Division of Ratepayer Advocate	E09707466	Low-income issues	New Jersey	97-98
Appleby v. Metropolitan Dade County Housing Agency	Legal Services of Greater Miami	N/A	HUD utility allowances	Fed. court: So. Florida	97 - 98
Re. Restructuring Plan of PECO Energy Company	Energy Coordinating Agency of Philadelphia	R-00973953	Universal service	Pennsylvania	97
Re. IES Industries Merger	Iowa Community Action Association	SPU-96-6	Low-income issues	Iowa	97
Re. New Hampshire Electric Restructuring	NH Comm. Action Ass'n	N/A	Wires charge	New Hampshire	97
Re. Merger of Atlantic City Electric and Connectiv	Division of Ratepayer Advocate	EM97020103	Low-income	New Jersey	97
Re. Connecticut Power and Light	City of Hartford	92-11-11	Low-income	Connecticut	97
Re. Comprehensive Review of RI Telecomm Industry	Consumer Intervenors	1997	Consumer protections	Rhode Island	97
Re. Natural Gas Competition in Wisconsin	Wisconsin Community Action Association	N/A	Universal service	Wisconsin	96
Re. Baltimore Gas and Electric Merger	Maryland Office of Peoples Counsel	CASE NO. 8725	Low-income issues	Maryland	96
Re. Northern States Power Merger	Energy Cents Coalition	E-002/PA-95-500	Low-income issues	Minnesota	96
Re. Public Service Co. of Colorado Merger	Colorado Energy Assistance Foundation	N/A	Low-income issues	Colorado	96

CASE NAME	CLIENT NAME	Docket No. (if available)	TOPIC	JURIS.	YEAR
Re. Massachusetts Restructuring Regulations	Fisher, Sheehan & Colton	DPU-96-100	Low-income issues/energy efficiency	Massachusetts	96
I/M/O PGW FY1996 Tariff Revisions	Philadelphia Public Advocate	No Docket No.	Credit and collection / customer service	Philadelphia	96
Re. FERC Merger Guidelines	National Coalition of Low-Income Groups	RM-96-6-000	Low-income interests in mergers	Washington D.C.	96
Re. Joseph Keliikuli III	Joseph Keliikuli III	N/A	Damages from lack of homestead	Honolulu	96
Re. Theresa Mahaulu	Theresa Mahaulu	N/A	Damages from lack of homestead	Honolulu	95
Re. Joseph Ching, Sr.	Re. Joseph Ching, Sr.	N/A	Damages from lack of homestead	Honolulu	95
Joseph Keaulana, Jr.	Joseph Keaulana, Jr.	N/A	Damages from lack of homestead	Honolulu	95
Re. Utility Allowances for Section 8 Housing	National Coalition of Low-Income Groups	N/A	Fair Market Rent Setting	Washington D.C.	95
Re. PGW Customer Service Tariff Revisions	Philadelphia Public Advocate	No Docket No.	Credit and collection	Philadelphia	95
Re. Customer Responsibility Program	Philadelphia Public Advocate	No Docket No.	Low-income rates	Philadelphia	95
Re. Houston Lighting and Power Co.	Gulf Coast Legal Services	12065	Low-Income Rates	Texas	95
I/M/O Petition to Stay PGW's Suspension of CRP customers who did Not Assign LIHEAP Grant to PGW	Philadelphia Public Advocate	No Docket No.	Low-Income rates	Philadelphia	95
Re. PGW Tariff Changes, Programs and Information Systems	Philadelphia Public Advocate	No Docket No.	Credit and collection	Philadelphia	95
Re. Request for Modification of Winter Moratorium	Philadelphia Public Advocate	No Docket No.	Credit and collection	Philadelphia	95
Re. Dept of Hawaii Homelands Trust Homestead Production	Native Hawaiian Legal Corporation	N/A	Prudence of trust management	Honolulu	94
Re. SNET Request for Modified Shutoff Procedures	Office of Consumer Counsel	94-06-73	Credit and collection	Connecticut	94
Re. Central Light and Power Co.	United Farm Workers	128280	Low-income rates/DSM	Texas	94
Blackwell v. Philadelphia Electric Co.	Gloria Blackwell	N/A	Role of shutoff regulations	Penn. courts	94

CASE NAME	CLIENT NAME	Docket No. (if available)	TOPIC	JURIS.	YEAR
U.S. West Request for Waiver of Rules	Wash. Util. & Transp. Comm'n Staff	UT-930482	Telecommunications regulation	Washington	94
Re. U.S. West Request for Full Toll Denial	Colorado Office of Consumer Counsel	93A-6113	Telecommunications regulation	Colorado	94
Washington Gas Light Company	Community Family Life Services	Case 934	Low-income rates & energy efficiency	Washington D.C.	94
Clark v. Peterborough Electric Utility	Peterborough Community Legal Centre	6900/91	Discrimination of tenant deposits	Ontario, Canada	94
Dorsey v. Housing Auth. of Baltimore	Baltimore Legal Aide	N/A	Public housing utility allowances	Federal district court	93
Penn Bell Telephone Co.	Penn. Utility Law Project	P00930715	Low-income phone rates	Pennsylvania	93
Philadelphia Gas Works	Philadelphia Public Advocate	No Docket No.	Low-income rates	Philadelphia	93
Central Maine Power Co.	Maine Assn Ind. Neighborhoods	Docket No. 91-151-C	Low-income rates	Maine	92
New England Telephone Company	Mass Attorney General	92-100	Low-income phone rates	Massachusetts	92
Philadelphia Gas Works	Philadelphia Public Advocate	No Docket No.	Low-income DSM	Philadelphia	92
Philadelphia Water Dept.	Philadelphia Public Advocate	No Docket No.	Low-income rates	Philadelphia	92
Public Service Co. of Colorado	Land and Water Fund	91A-783EG	Low-income DSM	Colorado	92
Sierra Pacific Power Co.	Washoe Legal Services	N/A	Low-income DSM	Nevada	92
Consumers Power Co.	Michigan Legal Services	No Docket No.	Low-income rates	Michigan	92
Columbia Gas	Office of Consumer Advocate (OCA)	R9013873	Energy Assurance Program	Pennsylvania	91
Mass. Elec. Co.	Mass Elec Co.	N/A	Percentage of Income Plan	Massachusetts	91
AT&T	TURN	90-07-5015	Inter-LATA competition	California	91
Generic Investigation into Uncollectibles	Office of Consumer Advocate	I-900002	Controlling uncollectibles	Pennsylvania	91

CASE NAME	CLIENT NAME	Docket No. (if available)	TOPIC	JURIS.	YEAR
Union Heat Light & Power	Kentucky Legal Services (KLS)	90-041	Energy Assurance Program	Kentucky	90
Philadelphia Water	Philadelphia Public Advocate (PPA)	No Docket No.	Controlling accounts receivable	Philadelphia	90
Philadelphia Gas Works	PPA	No Docket No.	Controlling accounts receivable	Philadelphia	90
Mississippi Power Co.	Southeast Mississippi Legal Services Corp.	90-UN-0287	Formula ratemaking	Mississippi	90
West Kentucky Gas	KLS	90-013	Energy Assurance Program	Kentucky	90
Philadelphia Electric Co.	PPA	N/A	Low-income rate program	Philadelphia	90
Montana Power Co.	Montana Ass'n of Human Res. Council Directors	N/A	Low-income rate proposals	Montana	90
Columbia Gas Co.	Office of Consumer Advocate	R-891468	Energy Assurance Program	Pennsylvania	90
Philadelphia Gas Works	PPA	No Docket No.	Energy Assurance Program	Philadelphia	89
Southwestern Bell Telephone Co.	SEMLSC	NF-89749	Formula ratemaking	Mississippi	90
Generic Investigation into Low-income Programs	Vermont State Department of Public Service	Case No. 5308	Low-income rate proposals	Vermont	89
Generic Investigation into Dmnd Side Management Measures	Vermont DPS	N/A	Low-income conservation programs	Vermont	89
National Fuel Gas	Office of Consumer Advocate	N/A	Low-income fuel funds	Pennsylvania	89
Montana Power Co.	Human Resource Develop. Council District XI	N/A	Low-income conservation	Montana	88
Washington Water Power Co.	Idaho Legal Service Corp.	N/A	Rate base, rate design, cost-allocations	Idaho	88

Appendix B

Low-Income Rate Affordability Assistance: 25 Years of Independent Third Party Program Evaluations

Compiled by:

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December 2014 (3d ed.)

Items for which Electronic Copies Exist	Date Report Published	Jurisdiction of Program Subject to Evaluation	Utility/Program	Consultant Preparing Evaluation Report	Report Title
Reports for which electronic copies do not exist:	1985	Ohio	State	Tractell, Inc.	A Study of the Commission's Procedural Determination of Customer Payment Options Pursuant to the Investigation into the Long-Term Solutions Concerning Disconnection of Gas and Electric Service in Winter Emergencies.
	1988	Illinois	State	Brenda Griffin	IRAPP: Preliminary Evaluation of the Illinois Residential Affordable Payment Program.
	1989	Montana	State	Thomas Schneider	Evaluation of Ravalli County Percentage of Income Payment Plan (PIPP) Pilot Project.
	1992	Pennsylvania	State	Pennsylvania PUC, Bureau of Consumer Services	Final Report on Investigation into the Control of Uncollectible Balances (Vol. 1 and Vol. 2).
1.	Dec-87	Rhode Island	State	Nora Barnes	A Study of Client Satisfaction: Rhode Island Percentage of Income Payment Plan
2	Jan-88	Rhode Island	State	Roger Colton	Evaluation of Warwick (Rhode Island) Percentage of Income Payment Plan (PIPP) Demonstration Project

Items for which Electronic Copies Exist	Date Report Published	Jurisdiction of Program Subject to Evaluation	Utility/Program	Consultant Preparing Evaluation Report	Report Title
3	1990	National	Non-program	Roger Colton	Client Consumption Patterns within an Income-Based Energy Assistance Program, Journal of Economic Issues, Vol. 24, Issue 4 (1990)
4	Jun-91	Philadelphia	Non-program	Institute for Public Policy Studies, Temple University	An Examination of the Relationship Between Utility Terminations, Housing Abandonment and Homelessness
5	Jan-93	Philadelphia	Philadelphia Gas Works (PGW)	Response Analysis (now Apprise)	Energy Assurance Program Pilot: Year One Report
6	Jan-96	NY	National Fuel Gas	Barakat & Chamberlin	Final Report: Process and Impact Evaluation of National Fuel Gas Distribution's Low-Income Residential Assistance Program
7	Dec-96	Colorado	PSCO	Steve Brown	Affordable Rate Pilot Project: Report on Two Evaluations of Public Service Company of /Colorado Payment Assistance Programs
8	1997	Wisconsin	Non-program	Ron Grosse	Win-Win Alternatives for Credit and Collection
9	Aug-99	Pennsylvania	National Fuel Gas	Barakat & Chamberlin	Final Evaluation Report: Low-Income Residential Assistance Program
10	Jun-00	Iowa	Non-program	Mercier Associates	Iowa's Cold Winters: LIHEAP Recipient Perspective
11	Feb-02	NY	Niagara Mohawk	Apprise	Low Income Customer Assistance Program: Impact on Payments and Arrearages
12	Jun-02	Penn	PECO	Gil Peach	Customers with Incomes to 50% of the Federal Poverty Level in PECO Energy's Customer Assistance Program
13	Jun-02	Penn	PGW	Gil Peach	Philadelphia Gas Works Universal Service Programs: Pathways to Compliance.
14	Aug-02	NY	Niagara Mohawk	Apprise	LICAP Program Evaluation: Final Report
15	Jan-03	Oregon	State	quantec	Oregon Energy Assistance Program Evaluation: Final
15A	Apr-03	National	Non-program	NRRI	Where Consumers Go for Help Paying Utility Bills

Items for which Electronic Copies Exist	Date Report Published	Jurisdiction of Program Subject to Evaluation	Utility/Program	Consultant Preparing Evaluation Report	Report Title
16	Sep-03	California	State	quantec	Evaluation of California Alternate Rates for Energy (CARE) Program's Outreach and Administrative Practices
17	Oct-03	Penn	Allegheny Power	RETEC Group	Evaluation of LIPURP and Other Allegheny Power Universal Service Programs
18	Oct-03	Penn	Duquesne Light	RETEC Group	Evaluation of CAP and Other Duquesne Light Universal Service Programs
19	Oct-03	Washington	PacifiCorp	quantec	Final Report: Washington Low-Income Bill Assistance Program: Phase II Impact Analysis
20	Oct-03	Missouri	Missouri Gas Energy	Roger Colton	The Impact of Missouri Gas Energy's Experimental Low-Income Rate (ELIR) on Utility Bill Payments by Low-Income Customers: A Preliminary Assessment
21	Apr-04	National	Non-program	Apprise	National Energy Assistance Survey Report: 2003
22	Jul-04	Penn	Columbia Gas	Melanie Popovich	Columbia Gas of PA, Inc.: Universal Service Program Impact Evaluation
23	Oct-04	Penn	First Energy: Penelec	Gil Peach	Impact Assessment of the First Energy Pennsylvania Universal Service Programs (Pennelec component)
24	Oct-04	Penn	First Energy: Met Ed/Penn Power	Gil Peach	Impact Assessment of the First Energy Pennsylvania Universal Service Programs: Met Ed and Penn Power components)
25	Nov-04	Penn	TW Phillips	Apprise	TW Phillips Energy Help Fund Program Evaluation: Final Report
26	Nov-04	NV	State	Gil Peach	State Fiscal Year 2003 Evaluation of the NRS 702: Energy Assistance Program and Weatherization Assistance Program
27	Nov-04	Penn	Dominion Peoples	Melanie Popovich	Dominion Peoples Universal Service Program: Impact Evaluation
28	Jan-05	Utah	PacifiCorp	quantec	Utah HELP: Program Evaluation
29	Apr-05	NV	State	Gil Peach	State Fiscal Year 2004 Evaluation of the NRS 702: Energy Assistance Programs and Weatherization Assistance Programs
30	Jun-05	Ohio	Non-program	Triad Research Group	Focus Groups with PIP Participants

Items for which Electronic Copies Exist	Date Report Published	Jurisdiction of Program Subject to Evaluation	Utility/Program	Consultant Preparing Evaluation Report	Report Title
31	Jul-05	National	Non-program	Apprise	LIHEAP Burden Evaluation Study: Final Report
32	Aug-05	Penn	PG Energy	Apprise	PG Energy: Universal Services and Energy Conservation Programs: Final Report
33	Sep-05	National	Non-program	Apprise	National Energy Assistance Survey Report: 2005
34	Nov-05	NJ	JCPL	Apprise	Evaluation of the New Jersey Universal Service Fund: Fresh Start Program: Jersey Power and Light Payment Counseling Program
35	Feb-06	Penn	PGW	Apprise	Philadelphia Gas Works Customer Responsibility Program: Final Evaluation Report
36	Feb-06	Missouri	Empire District Electric	Roger Colton	Experimental Low-Income Program (ELIP): Empire District Electric Company Final Program Evaluation
37	Apr-06	NJ	NJ BPU	Apprise	Impact Evaluation and Concurrent Process Evaluation of the New Jersey Universal Service Fund: Final Report
38	Apr-06	Penn	PECO	Apprise	PECO Energy Universal Services Program: Final Evaluation Report
39	Apr-06	Penn	PPL Electric	Apprise	PPL Electric Utilities: Winter Relief Assistance Program: Final Evaluation Report
40	May-06	NV	State	Gil Peach	State Fiscal Year 2005 Evaluation of the NRS 702: Energy Assistance Program and Weatherization Assistance Program
41	Oct-06	Penn	PECO	Apprise	PECO Energy Customer Assistance Program for Customers Below 50 Percent of Poverty: Final Evaluation Report
41	May-07	NV	State	Gil Peach	State Fiscal Year 2006 Evaluation of the NRS 702: Energy Assistance Program and Weatherization Assistance Program
43	May-07	MD	MD PSC	PA Consulting Group	Electric Universal Service Program Evaluation: Final Evaluation Report
44	Jul-07	Indiana	NIPSCO, CGCU, Vectren Energy	Roger Colton	An Outcome Evaluation of Indiana's Low-Income Rate Affordability Programs: 2007 Report
45	Jun-08	National	Non-program	Apprise	2008 Energy Cost Survey
46	Oct-08	Penn	PPL	Apprise	PPL Electric Utilities: Universal Service Programs: Final

Items for which Electronic Copies Exist	Date Report Published	Jurisdiction of Program Subject to Evaluation	Utility/Program	Consultant Preparing Evaluation Report	Report Title
					Evaluation Report
47	Dec-08	National	Non-program	Apprise	National Energy Assistance Survey Report: 2008
48	Apr-09	National	Non-program	Apprise	National Energy Assistance Survey Report: 2009
49	Aug-09	Indiana	NIPSCO, CGCU, Vectren Energy	Roger Colton	An Outcome Evaluation of Indiana's Low-Income Rate Affordability Programs: 2008/2009 Report
50	Oct-09	Penn	Duquesne Light	AECOM	Evaluation of Duquesne Universal Service Programs
51	Dec-09	IL	State	Apprise	Illinois PIP Program Impact Evaluation: Draft Report
52	Feb-10	National	Non-program	Apprise	LIHEAP Special Study of the 2005 Residential Energy Consumption Survey: Dimensions of Energy Insecurity for Low Income Households: Final Report
53	Jul-10	Penn	Allegheny Power	Apprise	Allegheny Power Universal Service Programs: Final Evaluation Report
54	Aug-10	Penn	Peoples Natural Gas	Melanie Popovich	Peoples: Universal Service Impact Evaluation
55	Oct-10	Penn	First Energy (Met Ed, Penelec, PennPower)	Gill Peach	2010 Impact Assessment of the First Energy Pennsylvania Universal Service Programs: Metropolitan Edison, Pennsylvania Electric Co., PennPower
56	Nov-10	Penn	Columbia Gas	Melanie Popovich	Columbia Gas: Universal Service Impact Evaluation§
57	Jan-11	NV	State	Gil Peach	SFY 2010 Evaluation: Energy and Weatherization Assistance Programs
58	May-11	Penn	Equitable Gas	Melanie Popovich	Equitable Gas: Universal Service Impact Evaluation
59	Nov-11	NV	State	Gil Peach	SFY 2011 Evaluation: Energy and Weatherization Assistance Programs: Executive Summary
60	Dec-12	NV	State	Gil Peach	SFY 2012 Evaluation: Energy and Weatherization Assistance Programs
61	Jun-07	Penn	UGI	Melanie Popovich	UGI Utilities Inc.: Universal Service Program Evaluation

Items for which Electronic Copies Exist	Date Report Published	Jurisdiction of Program Subject to Evaluation	Utility/Program	Consultant Preparing Evaluation Report	Report Title
62	Aug-06	Penn	NFG	Melanie Popovich	National Fuel Gas Distribution Corporation: Universal Service Program Evaluation
63	Feb-12	CO	Public Service Co. Colorado	Roger Colton	Public Service Company of Colorado Pilot Energy Assistance Program (PEAP) and Electric Assistance Program (EAP): 2011 Final Evaluation Report
64	Mar-12	Mass	State	Roger Colton	Attributes of Massachusetts Gas/Electric "Arrearage Management Programs" (AMP); 2011 Program Year
65	Oct-12	Penn	PECO	Apprise	PECO Energy Universal Services Program: Final Evaluation Report
66	Nov-11	National	Non-program	Apprise	National Energy Assistance Survey Report: 2011
67	May-11	Kentucky	Louisville Gas & Electric	Roger Colton	The Percentage of Income Payment Plan in Jefferson County, Kentucky: One Alternative to Distributing LIHEAP Benefits
68	Jul-12	Pennsylvania	UGI Utilities	Apprise	UGI Utilities, Inc. (Gas Division), UGI Penn Natural Gas Universal Service Program Final Report
69	Sept-13	Pennsylvania	PECO	PECO	Alternative Models for the Delivery of Customer Assistance Program Benefits
70	Oct-13	Pennsylvania	PECO	Roger Colton	Review of PECO Energy's Report on Alternative Models for the Delivery of Customer Assistance Benefits
71	Nov-11	Maryland	BGE	Apprise	Baltimore Gas and Electric Limited Income Pilot Payment Program: Final Evaluation Report

Appendix C

The Beneficial Business Implications of Improved Household Finances Resulting from A Utility Bill Affordability Program

Prepared for:

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Adoption of a bill affordability program for the low-income customers of a public utility is frequently argued to be a utility response to the “social” problem of poverty. The responsibility for responding to such social problems, some would argue, lies within the exclusive province of government, not the utility industry. The discussion below offers a different perspective. As the discussion will conclude, by increasing available household resources, and improving ability-to-pay, even the “social” benefits to individual households arising from a bill affordability program have distinct beneficial business implications to the utility offering the program.

Reaching this conclusion does not detract from the income benefits to households. It simply demonstrates that these benefits are not the exclusive benefits, and individual households are not the exclusive beneficiaries, from bill affordability assistance.

Improved Payment Outcomes

It is unarguable in today’s world that a bill affordability program will substantially and significantly improve payment patterns by participating low-income customers. The basis for this conclusion lies in the third party evaluations of every bill affordability program that has been implemented in the last thirty years. These improved payment patterns have direct business benefits to the utility in the form of increased revenue and decreased expenses. The discussion below, however, considers the additional indirect business ramifications arising from the improved household finances attributable to the improved payment patterns.

Two improved payment patterns are discussed below:

- Avoiding the disconnection of service leading to reconnections;
- Avoiding the disconnection of service leading to forced mobility.

Disconnections followed by reconnections: Avoiding the disconnection of utility service means that there is an avoided need of the household to undertake those efforts needed to reconnect service. The reconnection of service to an inability-to-pay customer does not “just happen” after service has been terminated for nonpayment. The actions a customer must take to find money, contact the utility, make payment arrangements, and await the physical reconnection all take time. The lost work time¹ devoted to the reconnection of service represents permanently lost wages to the household. Previous studies of the lost work time devoted to the reconnection of service after a disconnection have found that households lose eight (8) hours of work time.² Each hour of lost work time should be valued at the average wage for working poor households. Each lost hour of wages represents a reduced ability to pay a current or future utility bill.

Disconnections followed by forced mobility: Research has found that one-in-three utility service disconnections results in the customer moving to a new housing location. For example, one study in Philadelphia found that 32% of homes were abandoned in the first year after electric service was disconnected.

Even assuming that such relocation does not result in the loss of the customer’s job, the process of finding new housing and arranging for the move costs the customer time. Because low-wage workers overwhelmingly do not have leave time to devote to this housing search, the relocation will directly result in lost wages. Previous research into the lost wages attributable to housing searches after utility service terminations has found that customers devote 32 hours to the search.³ As indicated above, the value of these lost wages should be set at the average wage for a working poor household, with a resulting reduced ability-to-pay utility bills.

Improved Household Outcomes

Improved household outcomes (not merely payment outcomes as discussed above) from addressing inability-to-pay utility bills will also increase the household’s available resources to devote to utility bill payment. Three household outcomes are considered in this analysis:

¹ Most low-income, low-wage workers do not have paid leave time. National Fuel Funds Network (2002). A Fragile Income: Deferred Payment Plans and the Ability to Pay of Working Poor Utility Customers, at 4 – 5, National Fuel Funds Network: Washington D.C.

² Lisa Skumatz (March 2001). Non-Energy Benefits (NEBS): Recognizing and Measuring All Net Program Benefits, at 81, Skumatz Economic Research Associates (SERA): Superior (CO).

³ See, e.g., Measuring All Net Program Benefits, supra, at 86; see also, Jeff Riggert, et al. (November 1999). An Evaluation of the Non-energy Impacts of Vermont’s Weatherization Assistance Program, at 55, TecMRKT Works: Arlington (VA) (relying on Measuring All Net Program Benefits).

- Reductions in the extent to which low wage workers miss days of work due to the illness of the wage earner attributable to unaffordable energy;
- Reductions in the extent to which low wage workers miss days of work due to family care responsibilities attributable to unaffordable energy; and
- Reductions in the “forced mobility” (not attributable to service disconnections) of low-income households resulting from unaffordable home energy.

Avoided work lost to illness of wage earner: Previous research regarding the non-energy benefits of low-income programs has identified the prevention of illness as one primary non-energy benefit generated. One researcher reports that “households with sufficient and continuous heating may tend to experience fewer colds and other illnesses per year.”⁴ This researcher found that “one in fourteen households may have had one fewer sick day per year” after participating in a low-income program. Given the lack of paid leave time for low-wage employees, these avoided sick days represent a real increase in household income that would be available to pay home energy bills.

Avoided work lost to family care responsibilities: The discussion of improved health in the documentation of lost sick days should also include a consideration of lost wages due to family care responsibilities. According to the National Fuel Funds Network, “home energy crises contribute to lower nutrition for children and high rates of illness that contribute to the conflict between work and family care. One of the most significant causes of employee absenteeism and turnover is the inability to find child care.”⁵

A study of Niagara-Mohawk’s low-income assistance program confirms the role that energy assistance can play in preventing this conflict between work and family care responsibilities. The Niagara-Mohawk program evaluation considered the reduction of customer-reported health problems associated with the home being too cold in the wintertime.⁶ The evaluation reported a 69% reduction in the number of persons who perceived having health problems caused by their house being too cold (from 36% to 11%). In addition, the evaluation of the Indiana REACH⁷ program found that the energy assistance provided through that program resulted in an 18% increase in the children’s school attendance.⁸ The Indiana REACH evaluation found that the program reduced the number of school days

⁴ Measuring All Program Net Benefits, *supra*, at 95.

⁵ National Fuel Funds Network (October 2002). Local Layoffs as National Emergencies: Using the National Emergency Grant Program to Respond to the Unmet Home Energy Needs of Displaced Low-wage Workers, at 7 – 8, NFFN Toolkit #7, National Fuel Funds Network: Washington D.C., citing, Research and Policy Committee (1993). Why Child Care Matters: Preparing Young Children for a More Productive America, A Statement by the Research and Policy Committee of the Committee for Economic Development, at 1, Committee for Economic Development: New York.

⁶ Harrigan, M. (1992). Evaluating the Benefits of Comprehensive Energy Management for Low- Income, Payment-troubled Customers. Final Report on Niagara Mohawk Power Partnerships Pilot, Alliance to Save Energy: Washington D.C.

⁷ REACH is the Residential Energy Assistance Challenge (REACH) grant program operated by the U.S. Department of Health and Human Services.

⁸ M. Sami Khawaja (2001). Final Findings: Indiana REACH Evaluation, at III-9, III-11, Quantec: Portland (OR).

missed by the children of participating households. As with avoided sick time for the employee, himself/herself, this reduction in lost work-time devoted to family care will result in an increase in household income available to pay home energy bills.

Avoided forced mobility (not associated with nonpayment disconnections): One frequent impact of unaffordable home energy is the forced mobility of households even when no disconnection of service is involved. One study of Head Start families in Missouri found that 40% of all Head Start families were “frequently mobile.”⁹ Of these frequently mobile households, 50% cited unaffordable home energy bills as being an important factor in their most recent move.

Skumatz¹⁰ reported survey data indicating that 16% of weatherization program participants indicated that the weatherization activities “yes, definitely” helped them avoid having to move to another home. An additional 8% reported that the weatherization activities “yes, maybe” helped them avoid having to move to another home. This range (16% to 24%) brackets the Missouri findings (50% x 40% = 20%).

In addition to the lost wages associated with frequent mobility discussed above, the very process of moving imposes expenses on a household. In addition, the mobile household will be faced with the need to post a new rental security deposit. Third, the household will need to pay the utility-imposed fee for beginning or transferring service. All of these dollars are thus dollars that will not be available to pay future home energy bills.

Community-Wide Impacts

While the discussion above identifies the increased income available to pay home energy bills on at the household level, there is a community-wide impact of increasing income as well. Existing research indicates that low-income households tend to shop at local retail establishments. For food in particular, low-income households tend to shop at small, local food stores. Moreover, not only are low-income *households* more likely to shop locally, but the *businesses* serving low-income households are more likely to shop locally as well. Research in Oakland, California, for example, found that businesses serving low-income communities “strengthen other locally based business--even more than stores in middle-income neighborhoods.”¹¹ According to this research:

Oakland's low-income area businesses have a distribution network (incoming goods) that is 54 percent Oakland-based. Nineteen percent say their main suppliers are half inside the city and half outside, and 27 percent have suppliers outside the city borders. In stark contrast, only 19 percent of [more middle income neighborhood] stores have main suppliers in Oakland. Twenty-five percent report that half their suppliers are Oakland-based and half are not. Yet 56 percent have main suppliers from outside the city.

⁹ Roger Colton. “A Road Oft Taken: Unaffordable Home Energy Bills, Forced Mobility, and Childhood Education in Missouri,” 2 *Journal of Children and Poverty* 23 (1996).

¹⁰ Measuring All Program Net Benefits, *supra*, at 85.

¹¹ David Dante Troutt (1993). *The Thin Red Line: How the Poor Still Pay More*, at 35, Consumers Union: San Francisco (CA).

The research concluded that "low-income area businesses of whatever kind purchase the bulk of their goods from Oakland-based suppliers. These suppliers are themselves sources of local employment* * *."¹²

The increased income of individual low-income households will thus multiply to increase the income of the broader low-income community. In turn, this multiplier effect improves the community's capacity to pay the bills of the local provider of home utility service.

Summary and Conclusions

The inability-to-pay home energy service imposes direct financial costs on a public utility, in the form of expenditures such as credit and collection costs, uncollectible accounts, and working capital. Improving a utility's ability to collect its billed revenue can directly occur by making bills more affordable through the offer of a bill affordability program. The offer of a bill affordability program, however, also indirectly improves the ability of a utility to collect its billed revenue by improving household financial circumstances and increasing the household resources available to pay for utility bills.

The discussion above is not intended to present a comprehensive identification of individual household impacts that benefit the utility. It is instead intended to provide sufficient illustrations to demonstrate that while improved household circumstances inure to the benefit of the individual households, they also benefit the utility seeking to collect its bills. To argue that inability-to-pay is exclusively a "social" problem to be redressed by the government ignores these business benefits inuring to the benefit of the utility in its capacity as a utility.

¹² Id., at 36.

Appendix D



COMMONWEALTH OF PENNSYLVANIA
PENNSYLVANIA PUBLIC UTILITY COMMISSION
P.O. BOX 3265, HARRISBURG, PA 17105-3265

IN REPLY PLEASE
REFER TO OUR FILE

M-2012-2290911

April 25, 2014

To: Parties of Record in M-2012-2290911 and all parties served with the Commission's April 4, 2013 order at that docket

Re: CAP Design Issue

On April 4, 2013, the Commission approved a Final Order at M-2012-2290911 relative to PECO Energy Company's (PECO) proposed Universal Service and Energy Conservation Plan (USECP) for 2013-2015, which, *inter alia*, details PECO's customer assistance plan (CAP). *PECO USECP for 2013-2015*, Docket No. M-2012-2290911. The order resolved all issues pertaining to PECO's USECP except for PECO's CAP design. The order called for further information from PECO on this one issue and allowed for comments. PECO filed its Second Amended USECP for 2013-2015 on May 6, 2013.¹ On September 30, 2013, PECO filed its *Report on Alternative Models for Delivery of CAP Benefits Including Fixed Costs Option (FCO) (Report)* analyzing several CAP design models. In response to informal inquiries by three advocate groups, PECO filed supplemental information on October 15, 2013.

On October 21, 2013, the Tenant Union Representative Network, *et al.* (TURN), the Coalition for Affordable Utility Services and Energy Efficiency in Pennsylvania (CAUSE-PA), and the Office of Consumer Advocate (OCA) individually filed comments regarding the *Report*, analyses, and premises asserted by PECO relative to the CAP design models and the FCO analysis. On October 31, 2013, OCA filed reply comments. On November 1, 2013, PECO filed reply comments asserting that there is no alternative CAP design superior to the design currently in place. Clearly, there is a difference of opinion among the parties regarding PECO's CAP design.

As it stands, PECO's proposed USECP for 2016-2018 is due to be filed by February 2, 2015. Based on comments regarding PECO's CAP design, it appears that the disagreements among the stakeholders will not be rectified in time to be implemented as

¹ On May 17, 2013, OCA filed comments requesting further clarifications to several components of PECO's Second Amended USECP for 2013-2015. On November 18, 2013, in response to OCA's May 17, 2013 comments regarding issues other than CAP design, PECO addressed OCA's concerns through reply comments.

part of PECO's USECP 2016-2018 absent concerted effort by the parties or by an on-the-record proceeding before an Administrative Law Judge.

Accordingly, the parties are directed as follows:

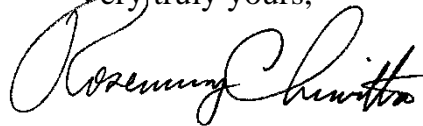
- Indicate, on or before June 30, 2014, in writing at Docket No. M-2012-2290911, if they have resolved some or all of their differences regarding PECO's CAP design as reflected in the record by comments and reply comments filed in response to PECO's September 30, 2013 *Report*. This may be a joint filing, with notice to the Office of Administrative Law Judge (OALJ), the Bureau of Consumer Services (BCS), and the Law Bureau.
- Consider enlisting the services of the Commission's mediation process in the interim between now and June 30, 2014, in an attempt to resolve their differences relative to PECO's CAP design.
- Indicate, by July 31, 2014, in writing, to BCS and OALJ, the elements of any partial or complete consensus resolutions. This may be a joint summary submission.

If the parties reach a full resolution of the CAP design issues, PECO shall include the proposed resolutions to CAP design issues in its proposed USECP for 2016-2018.

Failure to reach a full resolution by June 30, 2014 will result in this matter being assigned to the OALJ for an on-the-record proceeding and to prepare a recommended decision reflecting any consensus positions and recommending resolution of any remaining contested CAP design matters. Should this matter go to hearings, the parties are encouraged to continue to attempt to reach a consensus while the matter is before the OALJ. The OALJ proceeding, if necessary, is to be completed by October 31, 2014.

Questions may be directed to Grace McGovern, gmcgovern@pa.gov, in BCS.

Very truly yours,

A handwritten signature in black ink, appearing to read "Rosemary Chiavetta". The signature is fluid and cursive, with the first name "Rosemary" written in a larger, more prominent script than the last name "Chiavetta".

Rosemary Chiavetta
Secretary

cc: Kim Hafner, OALJ, khafner@pa.gov
Grace McGovern, BCS, gmcgovern@pa.gov
Joseph Magee, BCS, jmagee@pa.gov
Louise Fink Smith, Law Bureau, finksmith@pa.gov



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June 27, 2014

Rosemary Chiavetta, Secretary
Pennsylvania Public Utility Commission
Commonwealth Keystone Building
400 North Street, Second Floor
Harrisburg, PA 17120

RE: PECO CAP Design Mediation Status Update, Docket No. M-2012-2290911

Dear Ms. Chiavetta:

On April 25, 2014, the Commission issued a Secretarial Letter directing the stakeholders in this proceeding to:

- Indicate, on or before June 30, 2014, in writing at Docket No. M-2012-2290911, if they have resolved some or all of their differences regarding PECO's CAP design as reflected in the record by comments and reply comments filed in response to PECO's September 30, 2013 *Report*. This may be a joint filing, with notice to the Office of Administrative Law Judge (OALJ), the Bureau of Consumer Services (BCS), and the Law Bureau.
- Consider enlisting the services of the Commission's mediation process in the interim between now and June 30, 2014, in an attempt to resolve their differences relative to PECO's CAP design.
- Indicate, by July 31, 2014, in writing, to BCS and OALJ, the elements of any partial or complete consensus resolutions. This may be a joint summary submission.

This letter provides the June 30, 2014 status update.

As recommended, key stakeholders – PECO, the Office of Consumer Advocate, Community Legal Services on behalf of TURN, et al, the Pennsylvania Utility Law Project on behalf of CAUSE-PA, and Direct Energy -- did enlist the service of the Commission's mediation process. During May and June 2014 the stakeholders held four extensive mediation sessions (each nearly a full day). A fifth mediation session is scheduled for July 11, 2014.

The stakeholders are optimistic that they will be able to reach settlement on a proposed new design for PECO's CAP program, and would like to continue to utilize the mediation process toward that end. While substantial progress has been made, the parties are currently negotiating key details and collectively believe that additional mediation sessions will be necessary to fully explore the remaining issues.

Consequently, the parties request that they be allowed a one-month extension – until Friday, August 29 – to fulfill the additional reporting requirement set forth in the April 25, 2014 Secretarial Letter – that is, to indicate, by August 29, 2014, in writing, to BCS and OALJ, the elements of any consensus resolutions.

This status update has been reviewed and approved by the above-named stakeholders.

Sincerely,



Ward Smith
Counsel for PECO Energy Company

cc: (Via First Class Mail and/or email)

Cynthia Lehman, Commission Mediator
Administrative Law Judge Cynthia Fordham
Kim Hafner, Office of Administrative Law Judge
Grace McGovern, Bureau of Consumer Services
Joseph Magee, Bureau of Consumer Services
Louise Fink Smith, Law Bureau

Christy Appleby, Amy Hirkis, Candis Tunilo, Office of Consumer Advocate
Thu Tran, Rob Ballenger, Josie Pickens, Maripat Pillegi, Community Legal Services
Patrick Cicero, Harry Geller, PULP
Ron Cerniglia, Ashley Ramer, Direct Energy

Lauren Feldhake, Patricia King, Rich Schlesinger, Mark Kehl, Scott Neumann, PECO

**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

PECO Energy Company	:	
Universal Service and Energy	:	
Conservation Plan for 2013-2015	:	Docket No. M-2012-2290911
Submitted in Compliance with 52 Pa.	:	
Code §§ 54.74 and 62.4	:	

JOINT PETITION FOR SETTLEMENT

This Joint Petition for Settlement (“Joint Petition”) is submitted by the following parties in the above-captioned proceeding: PECO Energy Company (“PECO”), the Office of Consumer Advocate (the “OCA”), the Tenant Union Representative Network and Action Alliance of Senior Citizens of Greater Philadelphia (together, “TURN *et al.*”), and the Coalition for Affordable Utility Services and Energy Efficiency in Pennsylvania (“CAUSE-PA”) (collectively, the “Joint Petitioners.”)

The terms and conditions of the proposed settlement in this matter are set forth in the PECO CAP Mediation Settlement Term Sheet (“Term Sheet”), which is attached as Exhibit A. The Term Sheet is a comprehensive settlement among the aforementioned parties that resolves all issues pertaining to the above-captioned docket. The Joint Petitioners aver that this comprehensive settlement is in the public interest and, therefore, request that the Commission approve the settlement in its entirety.

Each of the Joint Petitioners will separately submit a Statement in Support of this Joint Petition.

The Joint Petitioners provide the following background regarding this Joint Petition:

1. The Term Sheet sets forth a comprehensive proposal to revise PECO's Customer Assistance Program ("CAP") and certain other programs that provide assistance to PECO's low-income customers.
2. Pursuant to the Commission's regulations, 52 Pa. Code §54.71 *et seq.*, every three years Pennsylvania electric distribution companies are required to file with the Commission their "universal service and energy conservation plans." This docket initially involved PECO's universal service and energy conservation plan covering the three-year period 2013-15 (the "2013-15 Plan") which PECO filed in this docket on February 28, 2012.
3. On November 8, 2012, the Commission issued a Tentative Order inviting written comments on the 2013-15 Plan. Written comments were filed by the Joint Petitioners and other parties, and the matter was subsequently set for litigation. During that litigation, the litigants discussed, but were not able to reach agreement regarding, a CAP design known as the "Fixed Credit Option," or "FCO."
4. On April 4, 2013, the Commission issued an Order in which it required PECO to make certain changes to its 2013-2015 Plan. The Commission's Order also directed PECO to conduct a study of the FCO, and other possible CAP design alternatives, for potential use by PECO in its three-year plan covering the period 2016-2018.
5. PECO filed the required report on September 20, 2013. In that report, PECO recommended that it stay with its existing CAP design, and not move to the FCO or other alternative design. The Joint Petitioners filed comments and reply comments on that report.
6. On April 25, 2014, the Commission issued a Secretarial Letter in which it directed the parties to this docket to attempt again to reach agreement on a new CAP design that all stakeholders could support. The Secretarial Letter recommended that the parties utilize the

Commission's mediation services, and stated that if negotiated resolution could not be obtained, the matter would be sent again to litigation.

7. The Joint Petitioners engaged the services of the Commission's mediation office, and conducted extensive mediation sessions. At least eight half-or full day sessions over the next several months, with extensive exchange of data and other information between the Joint Petitioners.
8. As a result of that extensive mediation effort and related settlement discussions, the Joint Petitioners reached agreement on a new CAP design and related issues, as set forth in the Term Sheet.
9. As stated previously, each of the Joint Petitioners will file a Statement in Support of this Joint Petition.

CONCLUSION

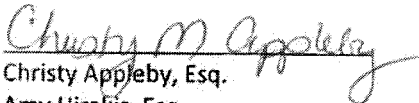
WHEREFORE, the Joint Petitioners, intending to be legally bound, respectfully request that the Commission approve this Joint Petition, including all terms and conditions set forth in the Term Sheet, and then terminate and mark closed the proceedings at Docket No. M-2012-2290911.

Respectfully submitted on March 20, 2015,



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215-981-3777

Exhibit A

**PECO CAP Mediation Settlement Term Sheet
("Term Sheet")**

PECO CAP Design Mediation
Settlement Term Sheet
Docket No. M-2012-2290911

A. FCO/CAP Design

1. Determination of Credits:

Beginning with PECO's October 2016 IT push, PECO will implement a new design for its Customer Assistance Program ("CAP"). The new CAP design will be based upon the Fixed Credit Option ("FCO"), with customer benefits calculated as follows:

Step 1: Determine customer's prior year's undiscounted charges:

- For each CAP customer, PECO will review the customer's bills at that residence for the prior 12 months and determine the dollar amount that the customer would have been charged *on an undiscounted basis* in those prior 12 months for their PECO-supplied utility service, including both the regulated and unregulated portions of that service (that is, including generation service, whether obtained from an EGS or PECO, and natural gas commodity service, whether obtained from an NGS or PECO) (the "Base Charge(s)").
- For regulated charges, the undiscounted charge will be calculated using the PECO tariff rates in effect for the time period being examined. For generation charges, the undiscounted charges will be calculated using PECO's generation price-to-compare ("PTC") for the time period being examined. For natural gas commodity charges, the undiscounted charges will be calculated using PECO's natural gas PTC for the time period being examined. (For the effect of base rate cases and quarterly GSA filings on determination of Base Charges, see Step 6 below.)
- Pro forma method of determining prior year's usage: If the customer does not have 12 months of prior service at their current residence at the time the above calculation is conducted, then PECO will create a pro forma profile to calculate that customer's trailing twelve months usage/charges. The pro forma profile will be based on the following, in order of preference if data is available:¹

¹ Because of the quarterly recalculations discussed in Step 6 below, these pro forma calculations will start to be replaced by data on the customer's actual usage three months after the pro forma calculation is done.

- Usage at that residence by the customer for the months available and actual usage by prior customers for the months unavailable.
 - Usage at that residence by prior customers;
 - Usage at similar residences or CAP residences in the same area; or
 - System-wide usage or CAP usage averages.
- PECO will prepare a weather normalization table that compares the weather in each of the trailing twelve months to “normal” weather for that calendar month, and which gives an adjustment factor to normalize usage and charges for each month on a weather-adjusted basis. This chart will be updated each month so that, at any time, PECO has available adjustment factors for the trailing 12 months. Once PECO has determined the Base Charges, those charges will be weather-normalized using the weather normalization table to create the “Weather-Normalized Base Charges.”

Step 2: Determine Verified Household Income and Federal Poverty Level:

- PECO’s existing income verification procedures will be used to determine Verified Household Income. PECO will then use that information and the number of people in the household to determine the household’s Federal Poverty Level.² Customers determined eligible as a result of receipt of a LIHEAP Cash Grant will, if possible, be placed into the federal poverty level commensurate with the grant amount. If PECO is not able to determine the FPL of a customer from LIHEAP Cash Grant materials, then PECO will utilize the LIHEAP Cash Grant recipient list to perform FCO outreach to the Grant recipients.

Step 3: Determine customer’s allowable Energy Burden:

- Once the household’s Federal Poverty Level has been determined, PECO will determine the household’s allowable Energy Burden, as follows:³

² A customer’s Federal Poverty Level percentage will be determined by reference to the then-current version of the Federal Poverty Guidelines published by the Federal Department of Health and Human Services.

³ The table is based upon the ranges found at 52 Pa. Code §69.265 (2)(i)(A). In each case, the energy burden listed in the table is the maximum allowable energy burden for that poverty level. If the Commission changes the energy burden ranges set forth in its Policy Statement, PECO will utilize the new maximum allowable energy burden for each poverty level.

Table 1: Energy Burdens

FPL	Electric Non-Heating ⁴	Electric Heating ⁵	Electric with Gas Heating ⁶
0-50%	5%	13%	13%
51-100%	6%	16%	16%
101-150%	7%	17%	17%

Step 4: Calculate customer's Annual Credit:

- PECO will determine the customer's Annual Credit by multiplying the Verified Household Income times that household's allowable Energy Burden to determine an Annual CAP Bill amount. The Annual CAP Bill will then be subtracted from the Weather-Normalized Base Charges; the resulting amount is the Annual Credit amount for that household. That is: Weather-Normalized Base Charges – Annual CAP Bill = Annual Credit.
- The maximum Annual Credit for any household will be⁷:

⁴ Applies to PECO Rate R customers who use a non-PECO heating fuel source, including PGW, propane, and oil.

⁵ Applies to PECO Rate RH customers.

⁶ Applies to PECO dual commodity customers.

⁷ The maximum Annual Credit was calculated to provide bills within Commission energy burden guidelines to approximately 93% of Rate R customers (including dual fuel customers), and approximately 96% of Rate RH customers. In addition, application of the Commission-required minimum monthly bills (\$12 for Rate R; \$30 for Rate RH) results in bills above Commission energy burden guidelines for approximately 6% of PECO's CAP customers overall. The combination of those two effects will result in 12% of PECO's Rate R, and 10% for PECO's Rate RH, with bills exceeding Commission energy burden guidelines, assuming a normal weather year.

The maximum Annual Credit levels set forth above will remain at these levels for four years after the program is implemented in October 2016. After four years, PECO will confer with the other signatories to determine whether there is a consensus new maximum Annual Credit level. If so, PECO will adopt that new level in its next-filed Three-Year Plan. If no consensus is reached, PECO may propose a new maximum Annual Credit level in its next-filed Three-Year Plan.

The maximum Annual Credits set forth in the table have been determined in an effort to reduce the number of CAP customers whose bills exceed commission energy burden guidelines. The Commission has previously granted PECO permission to apply maximum annual credits on a system-wide average,

Table 2: Maximum Annual Credits

FPL	Electric Non-Heating (Rate R) ⁸	Electric Heating (Rate RH) ⁹	Electric with Gas Heating (PECO Dual Commodity Customer) ¹⁰
0-50%	\$2,048	\$2,922	Same as Rate R for electric service; no maximum for gas service ¹¹
51-100%	\$1,389	\$1,881	
101-150%	\$1,241	\$1,661	

(These are the credit limits for any given household. As noted below in the Cost Containment section, PECO will also continue to apply a system-wide cost containment mechanism in which the total cost of its program is limited to the number of participants in the program times the inflation-adjusted Maximum Annual Credit set forth set forth in the Commission’s guidelines at 52 Pa. Code § 69.265(3)(v).)

Step 5: Apply Annual Credit to Bill:

- PECO will apply the total dollar amount of the Annual Credit over the course of the year. The credits will be applied in a manner intended to track the seasonal nature of usage, using the following monthly percentages¹²:

rather than as an individual customer limit. This settlement continues that practice. See also section A3 (Cost Containment) below.

⁸ If PECO is granted an electric base rate increase, the maximum allowable credits will be increased by a percentage equal to the system-wide residential distribution rate increase, applied to the portion of the Maximum Credit that is attributable to distribution rates.

⁹ If PECO is granted an electric base rate increase, the maximum allowable credits will be increased by a percentage equal to the system-wide residential heating distribution rate increase, applied to the portion of the Maximum Credit that is attributable to distribution rates.

¹⁰ If PECO is granted a gas base rate increase, the maximum allowable credits will be increased by a percentage equal to the system-wide residential distribution rate increase, applied to the portion of the Maximum Credit that is attributable to distribution rates.

¹¹ This continues PECO’s current gas CAP program policy.

¹² PECO may adjust these percentages to reflect the most current data available to it at any given time. However, any such adjustments will affect only the distribution of the Annual Credit to bills, not the amount of the Annual Credit.

Table 3: Seasonality Distribution

Month	Rate R	Rate RH	Gas
Jan	9.6%	13.9%	20.6%
Feb	8.9%	14.2%	19.5%
Mar	8.9%	12.2%	14.5%
Apr	7.0%	9.0%	9.6%
May	5.8%	5.3%	4.5%
June	7.7%	5.2%	2.6%
July	11.3%	6.4%	2.0%
Aug	10.6%	5.9%	1.8%
Sept	9.3%	5.4%	2.0%
Oct	6.6%	4.5%	2.6%
Nov	6.6%	6.4%	6.9%
Dec	8.7%	11.7%	13.6%
Total	100.0%	100.0%	100.0%

- Credits will be applied on a “rolling” basis; that is, if the customer’s credit in a month exceeds the outstanding balance, the credit will be “rolled” forward to future months and used to offset future balances.

Step 6: Periodic Recalculation and Adjustment of Annual Credit

- PECO will recalculate Step 2 for each customer during a biennial certification and recalculation. At that time, each customer will be required to re-verify their income level and size of household.
- PECO will recalculate Steps 1,3,4 and 5 annually to determine a new Annual Credit for each customer. PECO currently intends to perform this recalculation on or near the anniversary of a customer’s enrollment in the FCO, but retains the right to spread the recalculation event across the full calendar year for work management purposes.
- Every three months, PECO will recalculate Step 1 using the customer’s most recent three months’ data on usage/charges. PECO will then use the results of the Step 1 recalculation as inputs to complete Steps 2 through 5 to determine a Quarterly Recalculation of the Annual Credit. The adjusted Annual Credit will be applied to bills on a going-forward basis. This quarterly recalculation will be coordinated with the results of PECO’s quarterly Generation Services Adjustment filing and approval

so that, in each such quarterly adjustment, PECO's just-approved PTC will replace the oldest three months of PTC data in the underlying calculation.

- At any time during the year, a customer may verify to PECO that their household income or size of household has changed. Upon completion of that verification, if the changes result in a change in FPL tier, then PECO will recalculate Steps 1 through 5 to determine and apply a new Annual Credit for that household. The new Annual Credit will be applied prospectively beginning with the next monthly bill after the recalculation is completed and processed through PECO's billing system.
- At any time during the year, a customer may verify to PECO that a member of their household has increased usage as a result of medical reasons documented by a medical professional and that such increased, medically-driven usage is expected to be a part of that customer's long-term (more than 12 months) usage pattern. PECO will verify, through field visits or otherwise, that the increased usage is expected to be long-term. Upon such verification, PECO will increase the customer's Annual Credit by an amount equal to the estimated charges for increased usage as a result of medical equipment for the remainder of that quarter, provided however that the Annual Credit cannot exceed the maximum Annual Credit specified above in Step 4.
- Base rate case adjustments:
 - If PECO is granted an electric base rate increase, the portion of each Rate R customer's Annual Credit that is attributable to distribution rates will be increased by a percentage equal to the system-wide residential distribution rate increase .
 - If PECO is granted an electric base rate increase, the portion of each Rate RH customer's Annual Credit that is attributable to distribution rates will be increased by a percentage equal to the system-wide RH distribution rate increase.
 - If PECO is granted a gas base rate increase, the portion of each Rate R customer's Annual Credit that is attributable to distribution rates will be increased by a percentage equal to the system-wide residential gas distribution rate increase.

Step 7: New entrants to CAP program after program begins

- Customers who enter CAP after the FCO program begins will be required to verify income and household size. PECO will then apply Steps 1 through 6 to the new CAP participant.

2. Customers Who Do Not Receive An Annual Credit

- In the FCO, it is possible for a customer to be income-eligible for CAP (defined as having income of less than 150% of the Federal Poverty Level), but nonetheless receive a \$0 credit.
- Phase-Out Benefit: PECO estimates that, under the FCO approach, approximately 40,000 households that receive rate discounts under PECO's current program will not receive discounts under the FCO. PECO will identify the individuals in that category as of the October 2016 FCO implementation date and, for that population, will provide a Phase-Out Benefit of \$50 per household. The Phase-Out Benefit will be provided as a monthly bill credit of \$4.17 for each month the household continues to take service, up to a maximum of 12 consecutive months
- Other Benefits: Any customer who is verified to be eligible for CAP, but who does not receive an Annual Credit, will nonetheless be eligible for any other benefits that may be available to CAP customers including, but not limited to, PPA forgiveness, LIURP priority, etc., according to the terms of those program components.

3. Cost Containment

- Minimum monthly billing amounts: The Commission's CAP Guidelines, 52 Pa. Code §69.265(3)(i), state that CAP participant payments should be at least:

Rate R: \$12 per month

Rate RH: \$30 per month

Gas Heat: \$25 per month

Each monthly bill rendered under this program will have an asked-to-pay amount equal or greater to these monthly minimums, even if a rolling credit creates an overall credit or owed amount of less than the applicable minimum (\$12, \$25 or \$30).

- Maximum Annual Credits: The maximum Annual Credits set forth in Table 2 of this settlement exceed the maximum annual credits set forth in the Commission's guidelines at 52 Pa. Code § 69.265(3)(v). However, the Commission has previously granted PECO permission to apply those maximum annual credits on a system-wide average, rather than as an individual customer limit. This settlement continues that practice.

As of December 31, 2014, the inflation-adjusted maximum Annual Credit for Rate R is \$686.83 per customer, and the inflation-adjusted maximum credit for Rate RH is \$1,766.13. PECO's CAP population is approximately 127,000 Rate R customers and approximately 13,000 Rate RH customers. Applied on a system-wide basis, the current limit on electric CAP program costs¹³ is:

	Maximum Per Customer	Number of Customers	Systemwide Limit
Rate R	\$686.83	127,000	\$87.2 m
Rate RH	\$1,766.13	14,000	\$23 m
Max Total Program Cost			\$110.2 m

4. Cost Recovery

- “Shortfall” cost recovery: The total amount of credits to customers is known as the “shortfall” amount. The shortfall amount is recovered through PECO’s Universal Services Fund Charge (“USFC”). At present, USFC cost recovery includes a reduction of 22% for presumed reduction in PECO’s uncollectible expense, and 5% for presumed improvement in PECO’s cash working capital. Recovery of shortfall amounts, including the Phase-Out Benefit, shall continue on that same basis; provided, however, that the signatories reserve the right to challenge the appropriateness of the 22% and 5% offsets in any PECO base rate case.
- IT cost recovery: PECO estimates that it will incur \$7-11 million in IT transition costs to implement the FCO system. PECO shall not be required to move forward with the FCO program until it is satisfied that the Commission has approved or will approve recovery of its IT transition costs. The parties agree that PECO, in its discretion, may request that a maximum of \$11 million in IT transition costs be treated as a regulatory asset and deferred for accounting and financial reporting purposes subject to the following conditions:
 - A. That authorization for deferred accounting treatment is not an assurance that there will be future rate recovery;
 - B. That PECO claim the deferred costs at the first available opportunity in a base rate case;

¹³ The maximum total program cost changes with inflation and number of CAP participants.

- C. That PECO be directed to commence amortization on a reasonable schedule beginning with the IT in-service date;
- D. That any authorization for deferred accounting be limited to the IT expense and not extend to capital costs; and
- E. That any order will not limit any party in its ability to contest rate recovery of the deferred costs.

5. External review of FCO program:

Expert external evaluation of the new FCO program will require two full calendar years of operational data, plus a six-month period for data analysis and evaluation. With a nominal start date of October 2016, this timeline will require until December 2018 for operational data collection, and until June 30, 2019 to complete data analysis and evaluation. PECO's periodic six-year evaluation is currently required to be filed with the Commission on October 1, 2018. As part of its filing, PECO will therefore request that its six-year evaluation be rescheduled for filing on June 30, 2019. The evaluator's report will be provided to the Commission and to each member of PECO's USECP Advisory Committee and the signatories to this agreement at that time.

B. Arrearage Forgiveness

1. In a separate petition or in its next base rate case, in either case, to be filed on or before the first calendar quarter of 2016 to permit PUC review to occur before FCO program implementation in October 2016, PECO will propose an in-program arrearage forgiveness program with the following core provisions:
 - For each customer who is a CAP participant when PECO transitions to the FCO program in October 2016, PECO will determine the amount, if any, of that customer's IPA balance (the "Initial IPA Balance"). PECO will enter into a 60-month payment arrangement for an amount equal to 1/3rd of that customer's Initial IPA Balance (the "Payment Arrangement Amount").
 - For each dollar of the customer's Initial IPA Balance that the customer pays via its payment arrangement or otherwise, the customer's Initial IPA balance will be reduced by an additional \$2.00.
 - A proposed cost recovery mechanism for the in-program arrearage forgiveness program. If the proposal is made in a base rate proceeding, PECO agrees that it will not seek recovery of more than 2/3 of the projected cumulative Initial IPA balance for the entire CAP population as of October 1, 2016 from CAP customers in arrears or other ratepayers. If the proposal is made in a proceeding other than a base rate proceeding, PECO may propose a cost recovery mechanism that has substantially similar financial effect. All other parties reserve all rights to address PECO's

proposed IPA cost recovery mechanism when PECO makes its IPA arrearage forgiveness filing.

2. PECO will use its best efforts to obtain final PUC approval of the IPA forgiveness program and the core provisions described in paragraph 1.
3. PECO shall serve its petition on the signatories to this settlement and the Commission's Bureau of Investigation and Enforcement.
4. PECO shall not be required to proceed with the arrearage forgiveness program unless the cost recovery mechanism is approved by the Commission in substantially the form proposed by PECO or which PECO agrees to in subsequent settlement discussions with the parties to that proceeding.
5. If the proposed PECO's IPA forgiveness program obtains final Commission approval, including (a) the core arrearage forgiveness provisions described in paragraph 1 (or forgiveness provisions substantially as beneficial to CAP participants as the core provisions described in paragraph 1, as determined by TURN, Action Alliance and CAUSE-PA, in their discretion), and (b) cost recovery that meets the requirements of Paragraph 4 above, and such approval is obtained from the PUC prior to FCO program implementation, PECO will implement the approved arrearage forgiveness program at or before the implementation of the FCO program. If such approval is not obtained, then upon implementation of the FCO program in October 2016, PECO shall provide each CAP participant a 60-month payment agreement on their full Initial IPA Balance. Such 60-month payment agreement shall remain in effect: (a) until such time as final approval of PECO's IPA forgiveness program is obtained, or (b) in the event no such final approval is obtained, then for 60 months.

C. Usage reduction

1. Low-Income Usage Reduction Program ("LIURP"):

PECO will make the following changes to its LIURP program:

- Beginning October 2017, for a period of three years PECO will commit \$1 million annually in additional funds to LIURP to reduce the energy burden of CAP customers whose bills exceed the Commission's energy burden guidelines. These funds are in addition to the \$700,000 designated in this settlement to address de facto heating, but at PECO's discretion may be used for the de facto heating program if PECO determines that there is demand for additional de facto heating services and that such additional expenditures can be made within de facto heating program requirements.

- Prior to the implementation of the FCO program, PECO will identify CAP customers with extremely high use and benefits for highest priority LIURP treatment¹⁴, including the de facto heating treatment described below.
- After the FCO program begins, PECO will identify those customers whose calculated Annual Credit exceeds the allowable maximum. Again, that list of customers will be given highest priority for LIURP treatment,¹⁵ including the de facto heating treatment described below.
- Collectively, the groups of high users identified before and after the start of the FCO program are designated as the “De Facto Target Population”.

2. De facto heating:

“De facto” heating refers to Rate R customers, whose residence is nominally heated by a source other than electricity, but where the customer is in-fact heating with electricity (usually space heaters) because the other-fuel heating is not available. This can be due to a broken gas or oil furnace; it can also be due to inability to pay gas or oil bills, resulting in termination of that service. As noted, in such situations the customer often heats their home using inefficient electric space heaters, driving their electric bills.

The stakeholders believe that use of LIURP funds to address certain de facto heating situations is an appropriate use of LIURP funds where: (1) the mitigation measure is repair or replacement of a broken heater or furnace (but not payment of a gas or oil bill to re-establish oil or gas service); and (2) the mitigation measure has a payback period that meets certain criteria set forth below.

- PECO will assess members of the De Facto Target Population for de facto heating mitigation. PECO may offer to implement de facto heating mitigation measures in any De Facto Target Population household in which:
 - The mitigation measure is repair or replacement of a broken gas or oil heater or furnace;
 - The residence does not have other structural issues that would make it inappropriate under LIURP to perform a heater or furnace repair; and

¹⁴ Many of the noted customers were previously offered LIURP services, and have either received or rejected those services. However, at that time, the de facto heating pilot was not available. LIURP services that include the de facto heating pilot may be more successful in reducing usage at these residences.

¹⁵ See prior footnote.

- The mitigation measure, on average, has a payback period of 15 years or less, or is less than the expected life of the new measure, as determined by data available to PECO at that time.¹⁶
- Beginning October 2017, for a period of three years PECO will increase its current annual electric LIURP budget by \$700,000 per year for the purpose of implementing measures for the De Facto Target group.
- PECO may spend these de facto heating funds on any de facto heating measure in which the payback period for de facto heating measures up to the expected length of life of the new measure (furnace, etc.).

3. Act 129 Advocacy

- PECO will propose a budget addition to its low-income LEEP of \$1 million annually to be used in its Act 129 Phase III program to target programs to address the needs of the portion of the CAP population that has income in the 0-50% FPL range and which has high usage. This proposal will be an addition to the budget designated for PECO's Act 129 LEEP, and the de facto heating mitigation budget, and will not be a reallocation of Act 129 low-income designated resources.

4. Overall Advocacy: The signatories agree that they will support PECO's additional low-income LIURP, de facto heating and Act 129 funding levels.

5. Collaborative

Within 90 days of final Commission approval of this settlement, PECO will convene a stakeholder collaborative to address the following issues:


- i. Development of a detailed and comprehensive consumer education program regarding the CAP design changes and the effect of the changes on CAP participant benefits and obligations;
- ii. Educational materials regarding the effect on CAP customers of shopping decisions and the interrelationship of price changes to the CAP bill. (This

¹⁶ The Commission's regulations, 52 Pa. Code §58.11, provide that "space heating system replacement" measures should meet a 12-year payback period. In a 1996 audit of PECO's LIURP program, the auditors noted that: "As of December 4, 1995 the auditors have been instructed to use the 15 year payback criteria for recommending all allowable treatments that fall within this payback period."

collaborative agenda item will not be addressed until final resolution of the CAP shopping docket);

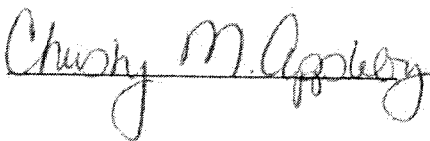
- iii. Educational materials regarding the importance of LIURP and Act 129 measures.
- iv. The intended audiences of these education programs will be: CAP participants, low-income customers who are not CAP participants, and social service and health agencies;
- v. Determination of alternative languages for the translation of educational materials.
- vi. Suggested measures to be pursued in the de facto heating program.
- vii. For each of the above, cost recovery mechanisms for the program involved.

Agreed:



Romulo L. Diaz, Jr. Vice-President and General Counsel
Ward L. Smith, Assistant General Counsel
For PECO Energy Company

3/5/15
Date



For The Office of Consumer Advocate

3/12/15
Date

For TURN et al.

Date

For CAUSE-PA

Date

Appendix E

Ontario to Remove Debt Retirement Charge and Launch Low-Income Electricity Support Program

Province Assisting Low-Income Ontarians with Electricity Costs

March 26, 2015 9:40 A.M.

Ontario is helping make electricity more affordable for families by removing the Debt Retirement Charge for all residential consumers and introducing the [Ontario Electricity Support Program](#) for low-income families.

The proposed program, administered through the Ontario Energy Board, would come into effect on January 1, 2016 and would help low-income Ontarians by providing them with financial assistance.

Qualifying individuals could be eligible for a \$20 to \$50 monthly credit based on the size of the household and income. For example, a family of four with an annual income of less than \$28,000, would be eligible for a \$38 monthly credit -- a total of about \$455 per year.

In addition, the Debt Retirement Charge for all residential consumers will be removed from the bill.

Helping low-income households with the cost of electricity is part of the government's economic plan for Ontario. The four-part plan is building Ontario up by investing in people's talents and skills, building new public infrastructure like roads and transit, creating a dynamic, supportive environment where business thrives and building a secure savings plan so everyone can afford to retire.

QUOTES

" The Ontario Electricity Support Program would provide ongoing assistance directly on the bills of eligible low-income electricity consumers as of January 1, 2016. This targeted assistance would be available to those who need it most, ensuring all Ontarians have continued access to clean and reliable electricity."

- Bob Chiarelli

Minister of Energy

" LIEN commends the Ontario government for establishing the Ontario Electricity Support Program. This program closes the loop in terms of addressing energy poverty in Ontario and is part of a comprehensive approach to the challenge that LIEN has been advocating for since 2004. We look forward to sharing program information with our stakeholders and the public."

- Theresa McClenaghan

Executive Director, Canadian Environmental Law Association (CELA) and a Founding Member, The Low-Income Energy Network

" As the largest municipal electricity distribution in Canada serving a diverse, urban community, Toronto Hydro is pleased to have another assistance program available to our more vulnerable customers to help them manage their electricity costs."

- Anthony Haines

President and CEO, Toronto Hydro

QUICK FACTS

- Removing the Debt Retirement Charge will save the typical residential electricity ratepayer \$5.60 per month.
- Electricity represents a significantly greater share of monthly expenses for low-income households than for higher-income households. Low-income households spend as much as 10% or more of their income on electricity bills, while consumers in the highest income bracket only use 2% or less.
- The proposed Ontario Energy Support Program would be ratepayer funded with an estimated charge of less than one dollar a month for a typical residential customer in 2016.
- The implementation of the Ontario Electricity Support Program would follow the conclusion of the Ontario Clean Energy Benefit on December 31, 2015. The [Ontario Clean Energy Benefit](#) started in 2011 for a five-year term and provides approximately \$1 billion in relief to eligible consumers annually.

LEARN MORE

- For more information, please visit the Ontario Energy Board's website at www.ontarioenergyboard.ca/oesp.

Jennifer Beaudry Minister's Office
416-319-3573
Lynn Wong Communications Branch
416-326-4542

[Available Online](#)
[Disponible en Français](#)

On March 26, 2015, the Minister of Energy announced a proposed support program for low-income electricity consumers in Ontario. At the Minister's request, the Ontario Energy Board (OEB) provided recommendations on a program design that would provide ongoing, and on-bill, rate assistance and we are pleased that the Minister largely endorsed our plan. Dubbed the Ontario Electricity Support Program, or OESP, it's one of several programs to help customers with limited financial resources.

Over the past year, we consulted with social service agencies, utilities, low-income advocates, First Nations and Métis communities among others in the design of this new rate program. We also looked at programs in other jurisdictions.

Now, we are moving forward towards the full design and implementation of the OESP, set to be available on January 1, 2016.

How it Works - Those in Greatest Need Will Get the Most Support

The OESP could benefit more than 500,000 low-income Ontario households. The recently updated Statistics Canada Low-Income Measure (LIM) will be used to determine eligibility for consumers of electric utilities, unit sub-meter providers and retail energy companies.

Consumers must apply, or opt-in, to the program which would be administered by a central service provider. Ontarians requiring assistance with the application process would be supported by local social agency partners, to be determined. A tailored process for communications and intake assistance will be developed for First Nations and Métis communities to help address their unique needs.

Once qualified, consumers will continue to also have access to a suite of low-income conservation programs to encourage reduced electricity use.

Funding for the program would come through a per kilowatt-hour charge on electricity bills. The Independent Electricity System Operator would manage the collection and distribution of funds to utilities (local electricity distributors and sub-meter providers). Utilities would apply OESP credits to customers' bills.

On-Bill Credits

A monthly credit would be applied to eligible customer bills. The average credit is estimated to be \$27, but will change depending on the number of residents and annual income per household.

A second funding level is also being considered for customers with special electricity requirements, such as electric heat, medical devices requiring electricity and First Nations and Métis consumers.

Designed With Efficiency in Mind

An efficient intake process will simplify the consumer experience. Consumers will be qualified for all energy relief programs simultaneously:

- OESP
- Special customer service rules for low-income consumers (e.g. Waiver of security deposit requirements)
- Low-income conservation programs
- Access to LEAP Emergency Financial Assistance (LEAP EFA) grants

They should only have to re-qualify every two years. Further, the requirement to re-qualify every two years could be extended for certain customers whose circumstances are unlikely to change e.g. some seniors and those with permanent disabilities on fixed incomes or medical assistance program clients.

LEAP EFA is Different

There is an important distinction between the OESP and the currently available LEAP EFA. Notably, the OESP is intended to provide *ongoing* support to low-income consumers struggling to pay their electricity bill while LEAP EFA offers *one-time* support for consumers who are temporarily unable to make ends meet due to emergency or illness and have received a disconnection notice.

Next Steps

The OEB will be working with the Ministry of Energy, IESO, electric utilities, unit sub-metering providers, energy retailers, low-income consumer advocates, social agencies and First Nations and Métis to facilitate a smooth program implementation. On-bill credits would begin for electricity consumption commencing January 1, 2016.

ONTARIO ELECTRICITY SUPPORT PROGRAM

FREQUENTLY ASKED QUESTIONS

1. WHAT IS THE OESP PROGRAM AND WHY DID THE OEB DESIGN IT?

The Ontario Energy Board (OEB) designed Ontario Electricity Support Program (OESP), at the request of the Minister of Energy, to provide ongoing, and on-bill, rate assistance to low-income customers.

The Ontario Clean Energy Benefit (10% bill credit) will end on December 31, 2015. This program will assist low income consumers, after the OCEB ends.

2. WHO WAS INVOLVED IN THE DESIGN OF THE PROGRAM?

We consulted with social service agencies, utilities, low-income advocates, First Nations and Métis communities among others in the design of this new rate program. We also looked at programs in other jurisdictions.

The OEB submitted a report with recommendations and the Minister of Energy has largely endorsed the program approach.

3. WHEN WILL THE PROGRAM LAUNCH/BE AVAILABLE?

First on-bill credits will begin after January 1, 2016.

The application process will begin this fall.

4. CAN THE OESP PROGRAM LAUNCH NOW?

For low-income consumers, this program will replace the Ontario Clean Energy Benefit (10% on-bill credit), which will end on December 31. So, the start date is January 1, 2016.

We have more work to do. The OEB is moving forward now with the detailed design and implementation of the Ontario Electricity Support Program.

5. WHAT IS THE IESO'S ROLE?

The Independent Electricity System Operator will assist with the financial matters - the collection of funds and then sending the money on to utilities who will apply the credit to low-income customer bills.

ON BILL CREDITS

6. HOW MUCH MONEY WILL BE CREDITED TO MY BILL?

It will depend on how many people live in your home and their combined annual income.

It is estimated that on-bill credits will range from \$20-\$50.

Sliding Scale Credit Chart (Available in the Report which will be public on March 26):

		Household Size						
		1 Person	2 Persons	3 Persons	4 Persons	5 Persons	6 Persons	7 or More Persons
Income Bracket	< \$28,000	\$20	\$30	\$34	\$38	\$42	\$46	\$50
	\$28,001 - \$39,000	-	-	\$30	\$34	\$38	\$42	\$46
	\$39,001 - \$48,000	-	-	-	-	\$30	\$34	\$38
	\$48,000 - \$52,000	-	-	-	-	-	-	\$30

7. WILL THERE BE A DIFFERENT PROGRAM FOR CUSTOMERS WITH SPECIAL ELECTRICITY REQUIREMENTS?

A second funding level is also being developed for low-income customers with special electricity requirements, such as electric heat, medical devices requiring electricity and First Nations and Métis communities.

We intend to have the program available on January 1, 2016.

ELIGIBILITY

8. HOW MANY PEOPLE WILL THE PROGRAM HELP?

The OESP could benefit more than 500,000 low income Ontario households. Those in greatest need will get the most support.

9. HOW DOES THE OEB DEFINE “LOW-INCOME”?

The recently updated Statistics Canada Low-Income Measure (LIM) will be used to qualify eligible customers. Then, the number of people living in the household and their combined income will be used to calculate the benefit. LIM is used to qualify consumers for other low-income programs as well.

10. WHO CAN I APPLY?

The program is available to all low-income electricity consumers of electric utilities, unit sub-meter providers and retail energy companies. Consumers must apply, or opt-in, to the program.

11. HOW DO I QUALIFY? (THE PARAMETERS)

Beginning this fall, we expect eligible low-income consumers will:

- Formally apply, or opt-in, to the program through a central service provider
- Meet the low-income definition as set by the recently updated Statistics Canada Low-Income Measure (LIM)
- Meet certain thresholds according to the number of people living in the home and total household income.

12. WHEN WILL YOU BE ACCEPTING APPLICATIONS?

This fall.

13. HOW DO I APPLY?

Beginning this fall, applications will be accepted. Watch for more information from the OEB and check our website periodically at ontarioenergyboard.ca/oesp for more information.

A central service provider will intake applications online, verify household income, and confirm eligibility with consumers.

Ontarians needing in-person support with an online application will be supported by local social agency partners [organizations to be determined].

14. HOW IS THIS PROGRAM DIFFERENT FROM LEAP, EFA?

There is an important difference between the OESP and the currently available LEAP EFA. Notably, the OESP is intended to provide *ongoing* support to low-income consumers struggling to pay their electricity bill while LEAP EFA offers *one-time* support for customers who are temporarily unable to make ends meet due to emergency or illness and have received a disconnection notice.

In some circumstances, an applicant may qualify for both programs.