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Department of Commerce
Division of Public Utilities

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Memorandum

TO: Public Service Commission

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DATE: June 30, 2021

SUBJECT: 20-035-20 - Home Electric Lifeline Program, Calendar Year 2020 Report

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In accordance with the Public Service Commission's (Commission) order in Docket No. 99-035-10, the subsequent Joint Stipulation developed by various interested parties and adopted by the Commission in Docket No. 00-035-T07, and the Order in Docket Nos. 03-035-01 and 04-035-21, the Division of Public Utilities (Division) hereby submits its Calendar Year 2020 report of the Home Electric Lifeline Program (HELP). It contains the Division's Calendar Year 2020 audit of the program, evaluation of the measures adopted by the Division, and the Division's conclusions and recommendations.

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The HELP Report

HOME ELECTRIC Lifeline PROGRAM

2020 ANNUAL REPORT

TO THE

UTAH PUBLIC SERVICE COMMISSION

FROM THE

UTAH DIVISION OF PUBLIC UTILITIES

June 30, 2021

HELP
2020 ANNUAL
REPORT

EXCECUTIVE SUMMARY

This report constitutes the Division's evaluation of the Home Electric Lifeline Program, HELP, for Calendar Year 2020. The results of the evaluation show that of the ten measures adopted by the Division to evaluate HELP, six have met or exceeded their associated standards (Administrative Costs, Process of Granting Credit, Process of Collecting Surcharge, Penetration Rate, Write-Offs, and Terminations per Customer). Among these measures that meet their respective standards were three measures considered as being useful and three measures that were considered as having limited value in determining the success of HELP. Four measures failed to meet their associated standards (Ending Account Balance, Recoveries per Customer, Balance in Arrears, and Accounts sent to Collection Agencies). Of these four measures three are among the group of measures the Division considers as having limited value, whereas the other one (Ending account balance) is among those measures considered as being useful in determining the success of HELP.

Regarding the attainment of the goals the program was designed to attain, the results are mixed. The program met four of the seven goals. These include: 1) Complying with Ordered Procedures, 2) Providing Benefits to Low-Income Recipients, 3) Administratively Simple and Easy to Administer, and 4) Not Overly Burdening Other Customers. The program did not meet the remaining goals, which include providing benefits to PacifiCorp, providing benefits to ratepayers in general, and positive impacts outweighing negative impacts.

In summary, based on its evaluation and audit of the HELP program, the Division concludes the program is being administered reasonably, with eligibility of applicants and the funds collected and disbursed in accordance with Utah Public Service Commission order in Docket No. 00-035-T07. The Division further concludes that recipients are benefiting without overly burdening either the ratepayers or the Company. However, because some of the goals and measures failed to meet their respective standards, the Division concludes that the program evaluation is inconclusive in terms of the success and effectiveness of the program. Despite this, the Division recommends no further action at this point.

The Division noticed that the ending account balance was higher than its standard and has been so for the last few years. The ending account balance for the calendar year 2020 was $1,779,586. This, apparently shows that this measure does not meet its standard. Hence, to bring the ending account balance down to its standard, the Division recommends setting the surcharge at zero for 6 months. This will bring the ending account balance down to approximately $102,316, which is within the limit for this measure. The Division also recommends PacifiCorp to file tariff revisions to comply with this recommendation.

BACKGROUND

The Salt Lake Community Action Program (SLCAP) and the Cross Roads Urban Center (CUC) initially proposed the Home Electric Lifeline Program (HELP) in Docket No. 97-035-01. In that Docket the Commission established a Low-Income Task Force to further study the program. On December 17, 1999, the task force submitted its report containing its findings to the Commission.

In Docket No. 99-035-10, the Commission ordered the implementation of the electric lifeline program, which consisted of a lifeline tariff, Schedule No. 3, and a lifeline tariff rider, Schedule No. 91. The mechanics of the program were established by a stipulation in 2000, which was approved by the Commission in its August 30, 2000 Report and Order in Docket No. 00-035-T07.

In its Report and Order (Docket Nos. 03-035-01 and 04-035-21) dated November 23, 2005, the Commission directed the Division "…to report annually to the Commission on its review, financial audit, cost-benefit analysis and recommendations regarding HELP."

On January 29, 2021, the Commission issued an Action Request with a due date of March 1, 2021, which was later extended to June 30, 2021, to the Utah Division of Public Utilities ("Division") requesting the Division to review the Company's filings for compliance and make recommendations. This report constitutes the Division's response to the Commission's Action Request and contains the evaluation of HELP for the Calendar Year 2020 and the Division's audit report for the Calendar Year 2020.

Program Goals

To help establish a set of Measures and Standards, the Division reviewed the Commission's orders in Dockets 97-035-01, 99-035-10, and 00-035-T07. Based upon this review, the Division concludes that the Commission's intended goals are as follows. To be successful, the HELP program will:

A. Provide benefits to utility customers in general;

B. Provide benefits to the low-income program recipients;

C. Not overly burden other customers;

D. Provide benefits that offset negative impacts;

E. Be administratively simple and inexpensive to administer;

F. Provide benefits to PacifiCorp in the form of lower overhead costs;

G. Comply with ordered procedures on Tariffs, Certification and Administrative charges.

The Division, with the help of R.W. Beck and the HELP work group, identified 26 potential measures and defined their standards. In the first annual report to the Commission, filed on December 7, 2003, the Division placed these measures into three categories: measures that are useful, measures that have a limited value, and measures that are not useful in evaluating the success and effectiveness of the HELP program[1]. However, in its Report and Order in Docket Nos. 03-035-01 and 04-035-21, issued on November 23, 2005, the Commission eliminated one of these measures, program annual collection cap. The following table depicts the remaining 25 measures and their respective categories.

[1] For a more detailed discussion of the measure classification see the Division's first annual HELP report to the Commission, December 2003. Pages 17-30.

Table 1. Categories of the Measures Adopted by the Division.

	Measure	Category
1	Administrative Cost	Useful
2	Ending Account Balance	Useful
3	Process Granting Credit to Recipients	Useful
4	Process Collecting Surcharge from Ratepayers	Useful
5	Penetration	Limited Value
6	Write-offs per Customer	Limited Value
7	Recoveries per Customer	Limited Value
8	Terminations per Customer	Limited Value
9	Balance in Arrears	Limited Value
10	Accounts Sent to Collection Agencies	Limited Value
11	Benefit to Recipients	Not Useful
12	Benefit to PacifiCorp	Not Useful
13	Cost to Ratepayers in General	Not Useful
14	Cost to Other Parties	Not Useful
15	Reconnections	Not Useful
16	Energy Consumption Trend	Not Useful
17	Donor's Missed Investment Opportunities	Not Useful
18	Donor's After Tax Contribution Compared to Pre-tax	Not Useful
19	Constitutional Measures	Not Useful
20	Broad-Based Macroeconomic Benefits	Not Useful
21	Accrued Interest	Not Useful
22	Recipient and Donor Perspectives and Attitudes	Not Useful
23	Program Stability	Not Useful
24	Returned Checks	Not Useful
25	Average Electricity Energy Burden	Not Useful

For the purpose of evaluating the effectiveness of the HELP program, the Division decided to use only those measures that are in the categories of measures that are useful and measures that have a limited value.

DIVISION AUDIT[2] REPORT OF HELP

The Division, through a series of data requests and meetings with Rocky Mountain Power and the Program Administrators of the Home Energy Assistance Target (HEAT) Program located in the Department of Workforce Services (DWS), has reviewed the HELP Program along with its policies and procedures and has determined that the HELP Program operates as intended and complies with Public Service Commission (Commission) requirements except as noted herein. Specifically, the account balance is not compliant with past Commission direction. To reduce the account balance, the Division recommends that the collection rates be set to zero for all customer classes on a temporary basis for approximately six months. The Division can then monitor program compliance through the account balance and the individual class schedule collection rates.

The Division's procedures and findings in connection with its audit of the HELP Program are as follows:

- Review of applicable orders, tariffs and stipulations establishing the program.
- Review the HELP application process administered by Salt Lake Community Action Program (SLCAP). SLCAP notifies past applicants that they must recertify each year to continue to receive the HELP benefit. SLCAP accepts HELP applications throughout the year.
- Review the HEAT application process administered by DWS. Households eligible for the HEAT Program also qualify for the HELP Program. DWS has approximately 41 offices under contract that handle HEAT applications statewide. The HELP Program is available year round whereas HEAT applications are accepted beginning November 1 and the program closes April 31 of the following year (HEAT is available year round in four counties). All applications approved for the HEAT program are input into the SEALWorks Program by an intake worker and then approved by an auditor who verifies the supporting documentation.

[2] In using the term "Audit" the Division notes that it did not conduct an independent audit as defined and conducted under Generally Accepted Auditing Standards as promulgated under the Auditing Standards Board of the American Institute of Certified Public Accountants. In this instance "Audit" means compliance review.

- Review a random sample of HEAT approved applications submitted for both the HEAT and HELP Programs for the 2020 program period. The purpose of the review was to determine if applicants satisfied the eligibility requirements as ordered by the Commission. The Division's review confirmed, on the basis of the information provided, that applicants were approved in accordance with Commission eligibility requirements.
- DWS provides the Company with a weekly updated list of eligible HEAT/HELP participants.
- Determine, on the basis of discussions that the Company gives applicants the appropriate monthly credit on a timely basis and that participants who are not re-certified are promptly removed from the HELP Program.
- Review a random sample of customer billing records selected from a list of eligible Utah customers to verify that the Low Income Lifeline Credit (Schedule 3) of $13.14 appears as a credit on the bills of eligible customers as a separate line item. The Division also verified that the Low Income Funding Surcharge (Schedule 91) was properly excluded from the bills of eligible customers for the lifeline rate. No exceptions were noted.
- Review a random sample of customer billing records selected from all Utah customers (excluding HELP eligible customers) to verify that the Low Income Funding Surcharge (Schedule 91) was appropriately included on power bills. No exceptions were noted.
- Review the HELP program's administrative costs charged by the Company and DWS for the year 2020. The Company charges were $2,874.12. The Company made a payment to DWS of $25,004.22. The maximum annual amounts allowed by the Commission are $10,000 for the Company and $40,000 for DWS. Included in the administrative cost category are the expired net metering credits for the annual year ending March 2020. The credit amount of $286,569.42 was included in the 2020 Customer Owned Generation and Net Metering Annual Report in Docket No. 20-035-32.
- Review and verify the carrying charge on the HELP account balance to ensure that it meets Commission orders. In Docket No. 20-035-T03, the Commission decreased the carrying charge rate from 4.37% to 3.88%, effective April 1st, 2020.

HELP Account Balance and Recommendation

Rocky Mountain Power's HELP report for the quarter ended December 31, 2020, shows the monthly activity for the program from its inception (September, 2000 through December 31, 2020). On January 1, 2021, the Commission approved an increase to the monthly HELP credit from $13.14 to $13.47 in Docket No. 20-035-04. Credits granted in 2018, 2019, and 2020 totaled $3,404,442, $3,317,224, and $3,348,505 respectively. The annual collection amount over the last four years, 2017 – 2020, were $3,400,519, $3,118,149, $3,165,518, and $3,203,968. The account balances at the end of 2017, 2018, 2019, and 2020 were $(1,578,414), $(1,510,555), $(1,557,248), and $(1,779,586) respectively.

The HELP Program account beginning balance on January 1, 2017 was $(1,581,730). On February 24, 2017 in Docket 17-035-T03, the Company asked the Commission to reduce the HELP surcharge rate because of the continuing over collected balance in the account. Based on the Company's estimates at the time, the account balance was predicted to be reduced to approximately $600,000 by mid-2019. With the reduction in surcharge rates, the balance has not reduced as predicted. One factor contributing to the account balance is the annual value of expired credits from net metering customers. The Commission has ordered a targeted HELP account balance of approximately three months' worth of surcharge collections[3]. The average amount of three months' worth of surcharge collection over the last five years is approximately $800,000. To reduce the account balance, the Division recommends that the collection rate for each customer schedule be set to zero on a temporary basis for six months. Six months of HELP credits is approximately equal to the current balance in the account. The expired net metering credits from this year should provide a buffer for the account. At the end of the six months, the collection rates can automatically be set at the currently approved rates for each class. Nevertheless, RMP should monitor the account balance month-to-month and request an earlier restart if necessary.

The Division has discussed program collections and the account balance with the Company. The Division concludes that the HELP Program operates as intended: collections and credits are roughly in balance. The Division can efficiently monitor the program through the annual collections, credits, and the account balance. The Division recognizes that the ending balance has remained relatively the same over the last five years with the annual credit amount granted being

[3] Docket 04-035-21 Report and Order pg. 19

similar to the annual collection. However, our recommendation to set the surcharge from Schedule 91 to zero for a period of six months should lower the credit balance to around $(300,000) to $(500,000).

Audit Conclusion

Based on its audit of the HELP program, the Division recommends the Company not collect any funds from Schedule 91 for a period of six months. The Company should monitor the account balance and request to reinstate the surcharge sooner if needed. The Division concludes, the program is being administered in a reasonable fashion and operates as intended. Eligibility of applicants and the funds collected and disbursed appear to be in accordance with Utah Public Service Commission order (Docket No. 00-035-T07)

DATA COLLECTION

All of the data used by the Division to develop this report was provided by PacifiCorp.

EVALUATION OF HELP

The evaluation of the HELP program for Calendar Year 2020 is exclusively based on those measures that were categorized as either useful or having a limited value in evaluating the performance of the HELP program. However, given the HELP program's small size relative to the state and national economy, the impact that the HELP program may have on these measures are dwarfed by the general macroeconomic conditions of the state and the nation. Therefore, any changes in these measures cannot be easily attributed to the HELP program. Hence, the Division will evaluate the impact of the HELP program on these measures based on the agreed upon standards.

1. Administrative Costs

The Commission allowed DWS and PacifiCorp to charge their ongoing direct administrative costs of up to $40,000 and $10,000, respectively. The Division Audit Report shows that DWS was paid $25,004.22. PacifiCorp charged $2,874.12 for the Calendar Year 2020. Both charges are well below the amount authorized by the Commission for administrative cost. Therefore, we conclude that this measure meets its standard.

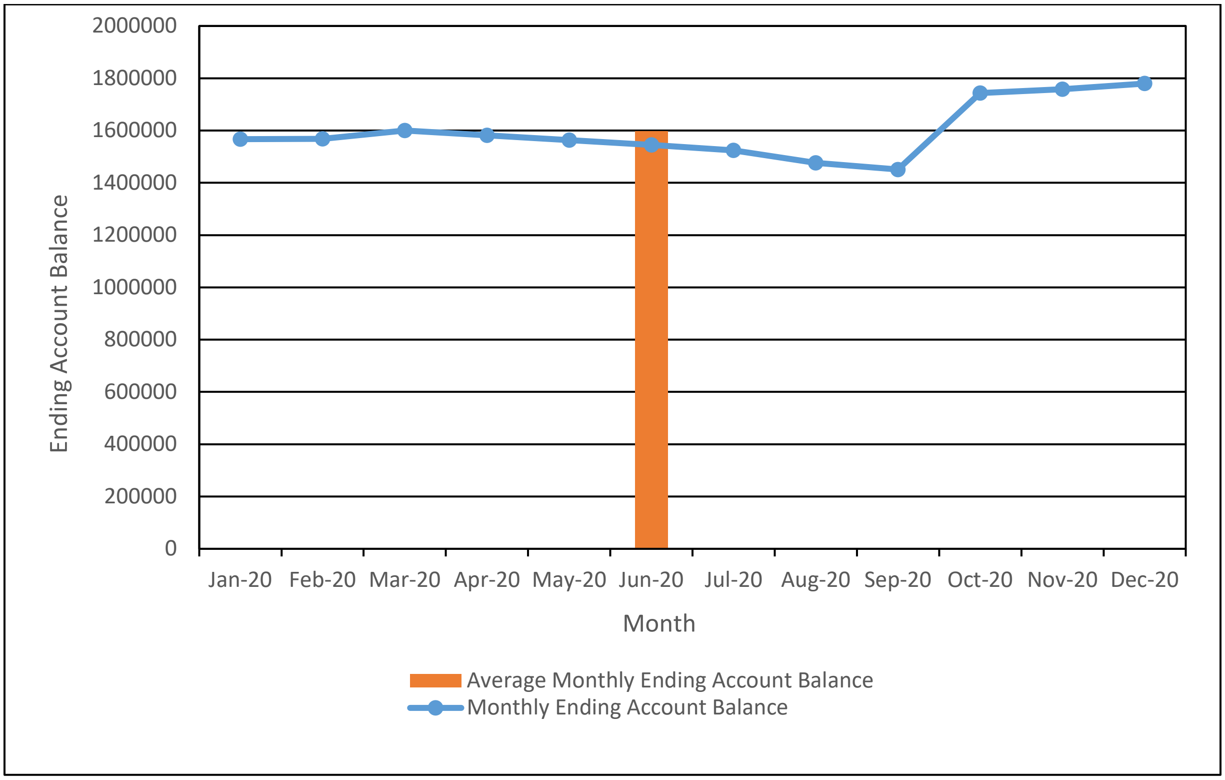
2. Ending Account Balance

The measure is the amount in the account at the end of the annual period under consideration – in this case December 2020. The standard for this measure was set by the Commission in its November 23, 2005 Report and Order in Docket Nos. 03-035-01 and 04-035-21 as approximately three months-worth of surcharge collections, which was estimated at the time of the Order as $450,000.

The Division understands the intent of this Order as to keep the ending account balance around three months-worth of collections. The estimated $450,000 at the time of the Order was based on a surcharge and a number of customers that were both lower than they currently are. The current three months-worth of surcharge collection is $838,635.17 (based on the monthly average for the last five years from 2016 to 2020). The ending account balance for the calendar year 2020 was $1,779,586. This, apparently shows that this measure does not meet its standard. Hence, to bring the ending account balance down to its standard, the Division recommends to set the surcharge at zero for 6 months. This will bring the ending account balance down to $102,316, which is within the limit of the standard for this measure. The Division also recommends PacifiCorp to file tariff revisions to comply with this recommendation.

Figure 1 shows that the ending account balance was steadily decreasing throughout the first three quarters of 2020 after which it increased. With the effect of Covid-19 around, the Division will keep monitoring the monthly ending account balance for consistency with the standard.

Figure 1. Monthly Ending Account Balance for Calendar Year 2020.



3. Process Granting Credit

The Division's auditor determined that PacifiCorp gives HELP recipients the appropriate monthly credit on a timely basis and that participants who are not re-certified are promptly removed from the HELP program. The auditor also determined that the Low Income Lifeline Credit (Schedule 3) of $13.14 appears on the bills of eligible customers as a separate line item. Therefore, we conclude that this measure meets its standard.

The Division also verified that the Low Income Funding Surcharge (Schedule 91) was properly excluded from the bills of eligible customers for the lifeline rate. No exceptions were noted.

4. Process Collecting Surcharge from Ratepayers

The Division's Auditor has verified that the Low Income Funding Surcharge (Schedule 91) was appropriately included on power bills. Therefore, we conclude that this measure meets its standard.

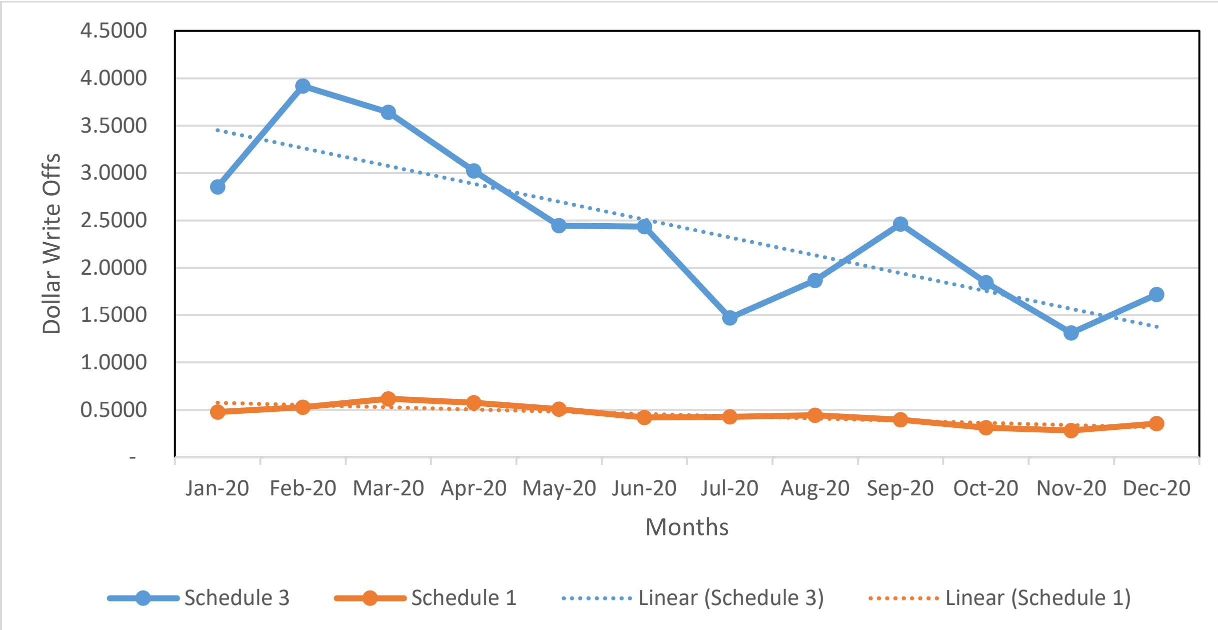
5. Penetration Rate

The measure is the proportion of eligible households receiving a credit under HELP. The standard for this measure is 42% of the eligible households. The average number of households participating in this program was 21,846 per month. If there were 45,000 eligible households in Utah, a figure estimated by Salt Lake CAP, then the penetration rate would be approximately 48.54%. If we assume that the number of eligible households in Utah estimated by the SLCAP is correct, then, based on the available data, we conclude that this measure meets its standard.

6. Write-Offs

The measure is the number of recipient accounts written-off and the associated dollar per customer amount. The standard is a reduction in these two figures. For Schedule 3, write-offs per customer initially increased from $2.85 to $3.92, then trended down to a low of $1.47 in July 2020. In August and September, the write-offs per customer ramped up to a high of $2.46 after which it declined (Figure 2). Figure 2 also shows that the dollar amounts of write-offs per customer for the Schedule 1 customers was relatively stable throughout the year and averaged $0.45. Since the dollar amount of write-offs per customer is generally decreasing for Schedule 3 customers and is relatively stable for Schedule 1 customers, we conclude that this measure meets its standard.

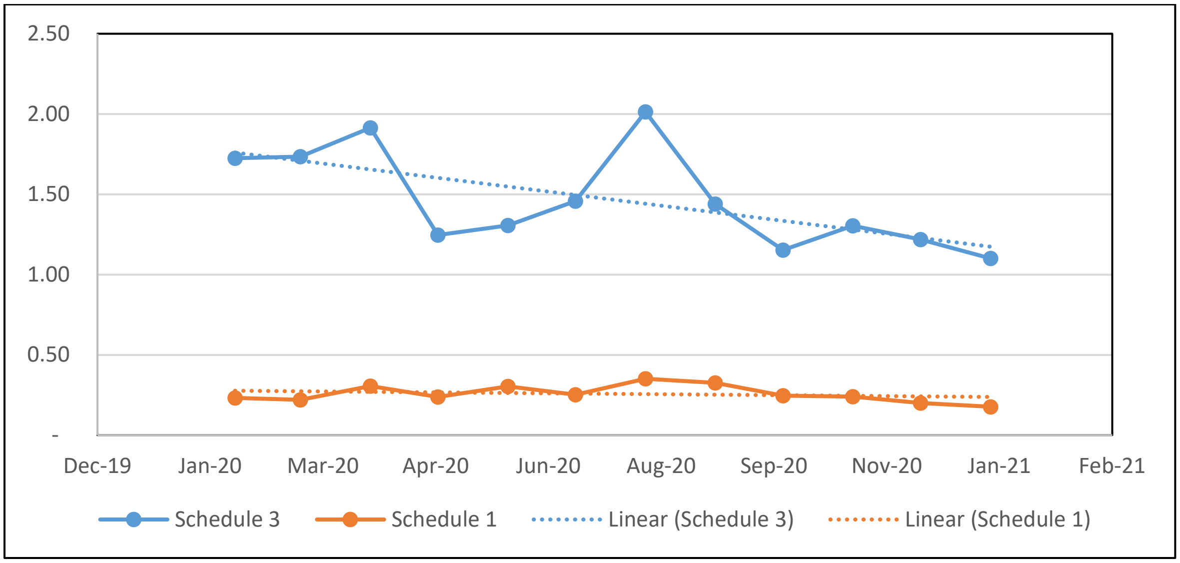
Figure 2. Dollar Write Offs per Customer



7. Recoveries per Customer

The measure is the dollar amount per customer being recovered from Schedule 3 customers whose arrearages have been sent to a collection agency. The associated standard is an increase in the amount recovered per customer. Figure 3 shows that the monthly recoveries per customer have been increasing during the first quarter of 2020. It decreased sharply during April, after which it increased to a high of $2.01 in July. Thereafter, it steadily declined for Schedule 3 customers. The Figure also shows that the monthly recoveries per customer have been stable around $0.26 throughout the year for Schedule 1 customers. Therefore, this measure did not meet its standard. The Division does not know how much of the changes in the recoveries per customer can be attributed to Covid-19. Hence, the Division will keep monitoring this measure for consistency with the standard.

Figure 3. Recoveries ($ per Customer)



8. Terminations

The standard for this measure is a reduction in the number of monthly termination notices and service terminations per customer. The number of termination notices per customer for Schedule 3 declined from a high of 0.15 in January to a low of 0.00 in April 2020, and it stayed there until the end of June (Figure 4) as a result of a Covid moratorium. Then it increased to a high of 0.11 in September, after which it declined to a low of 0.01 in December. Even though the impact of Covid is evident, the overall trend for this part of the measure was downwards. Hence, we conclude that this part of this measure meets its standard.

The number of actual terminations per customer for Schedule 3 customers in Calendar Year 2020, initially declined from 0.0011 in January to zero in April 2020. It remained at zero until July, as a result of Covid, after which it increased to 0.0015 in October and declined thereafter. The actual terminations for the customers in Schedule 1 followed the same trend though much lower than those of Schedule 3 over the Calendar Year 2020 (Figure 5). Hence, we conclude that this part of this measure did not meets its standard. The Division doesn't know how much the change in this measure is due to Covid. Thus, the Division will keep monitoring this measure for consistency with the standard.

Figure 4. Number of Termination Notices

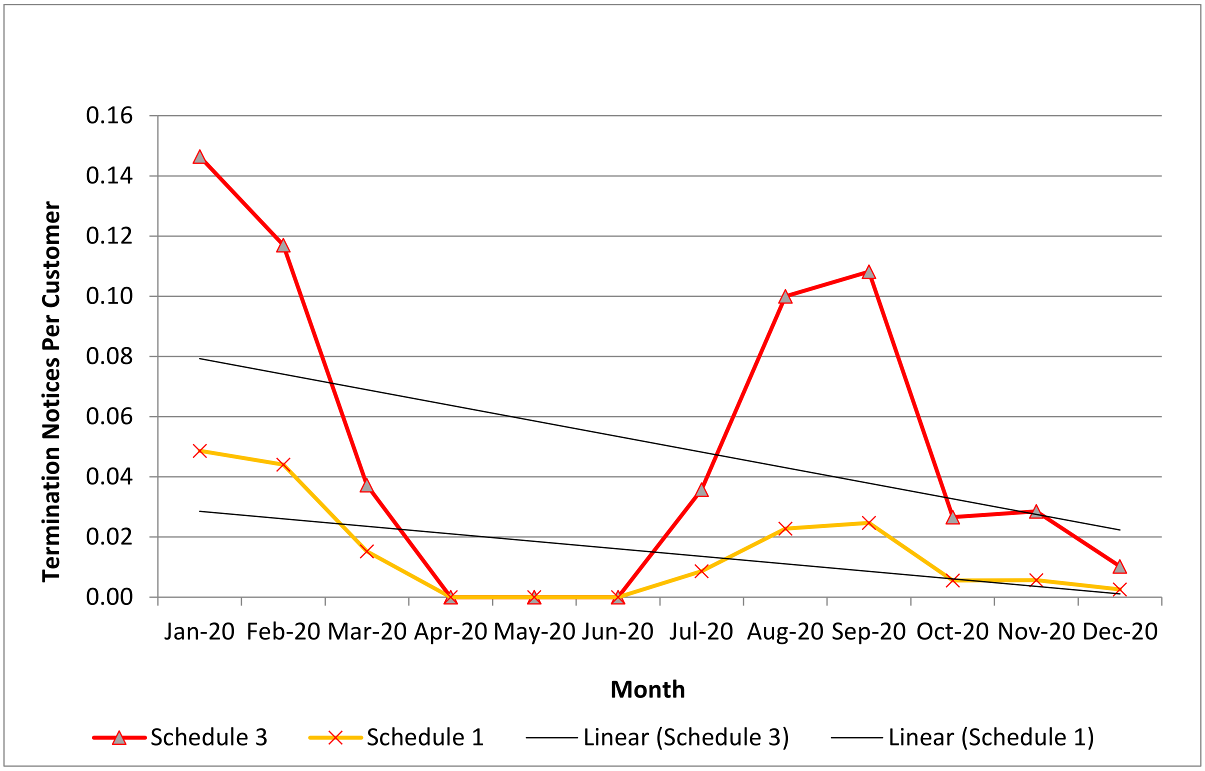
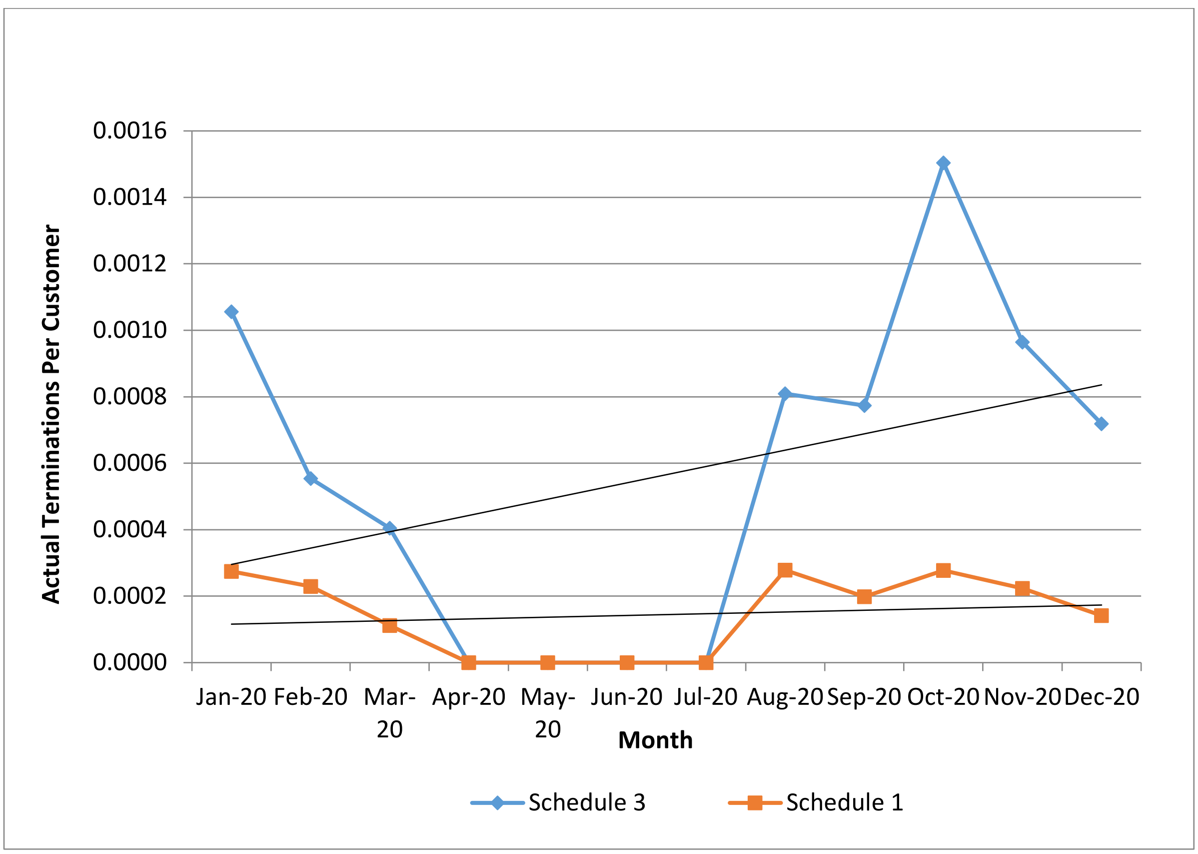


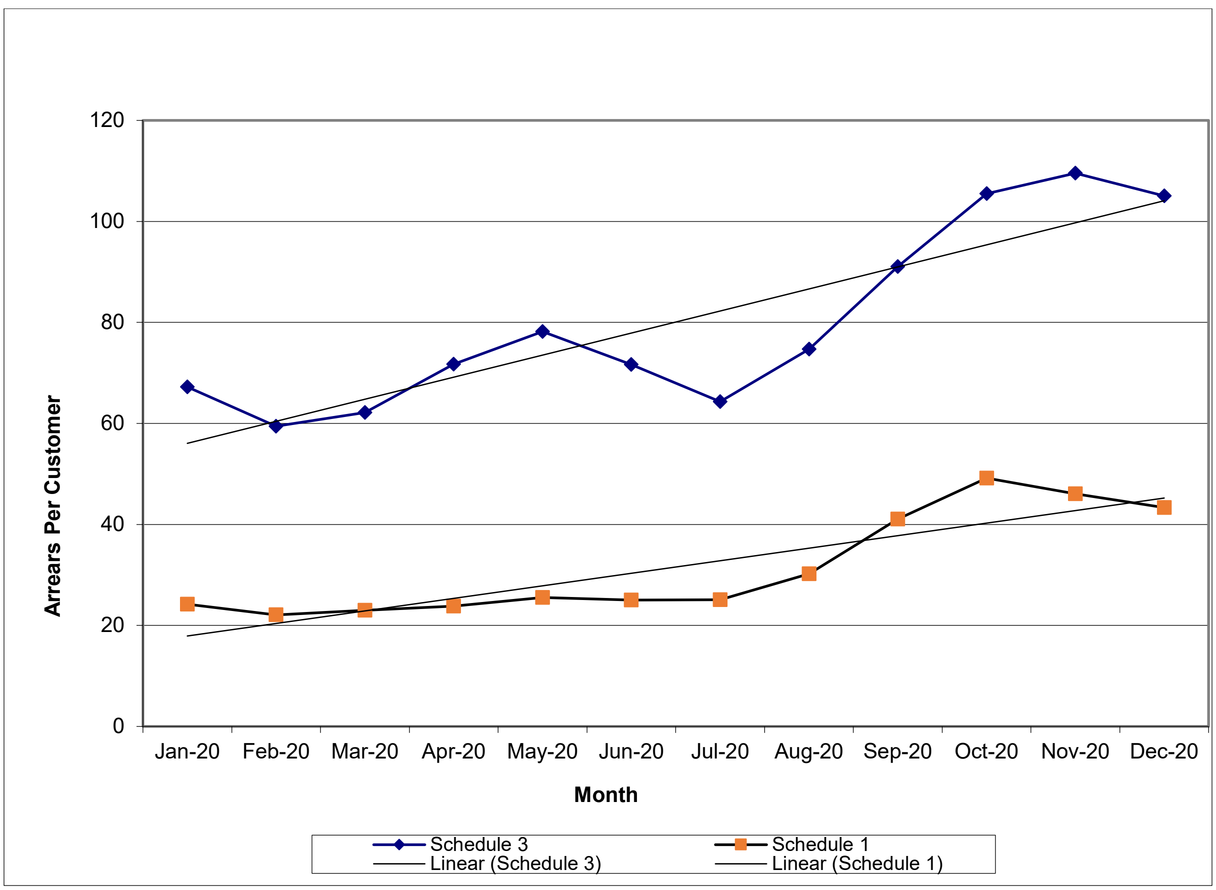
Figure 5. Actual Termination per Customer



9. Balance in Arrears

The standard for this measure is a reduction in the balance in arrears. Over the Calendar Year 2020, as the arrears per customer for Schedule 1, the arrears per customer for Schedule 3 depicted an upward trend and were more than twice as high as those for Schedule 1 (Figure 6). Hence, we conclude that this measure failed to meet its standard. However, the Division doesn't know how much of the change in the outstanding arrears per customer is due Covid. Hence, the Division will keep monitoring the monthly outstanding arrears per customer for consistency with the standard.

Figure 6. Monthly Outstanding Arrears per Customer for Calendar Year 2020.



10. Accounts sent to Collection Agencies

The standard for this measure is a reduction in the number of the recipient accounts and account balances sent to collection agencies. In Calendar Year 2020, the monthly number of recipient accounts (customers) sent to collection agencies decreased to a low of 430 accounts, then it increased to a high of 4,668 accounts in November. It then declined in December (Figure 7). The account balance per customer sent to collection initially declined to a low of 0.5 in June, then it increased to a high of 3.7 in November, after which it declined (Figure 8). The number of accounts sent to collection agencies for Schedule 1 and their balances per customer were relatively stable over the same period. We did not find evidence to suggest that HELP has reduced the number of accounts sent to collection agencies and their balances per customer for Schedule 3 customers. Therefore, we conclude that this measure fails to meet its standard. However, the Division does not know how much of the changes in the number of customer accounts sent to collection agencies and how much of the change in the balance of the accounts sent to collection can be attributed to Covid-19. Therefore, the Division will keep monitoring the trends of these measures for consistency with their respective accounts.

Figure 7. Number of Customer Accounts Sent to Collection Agencies

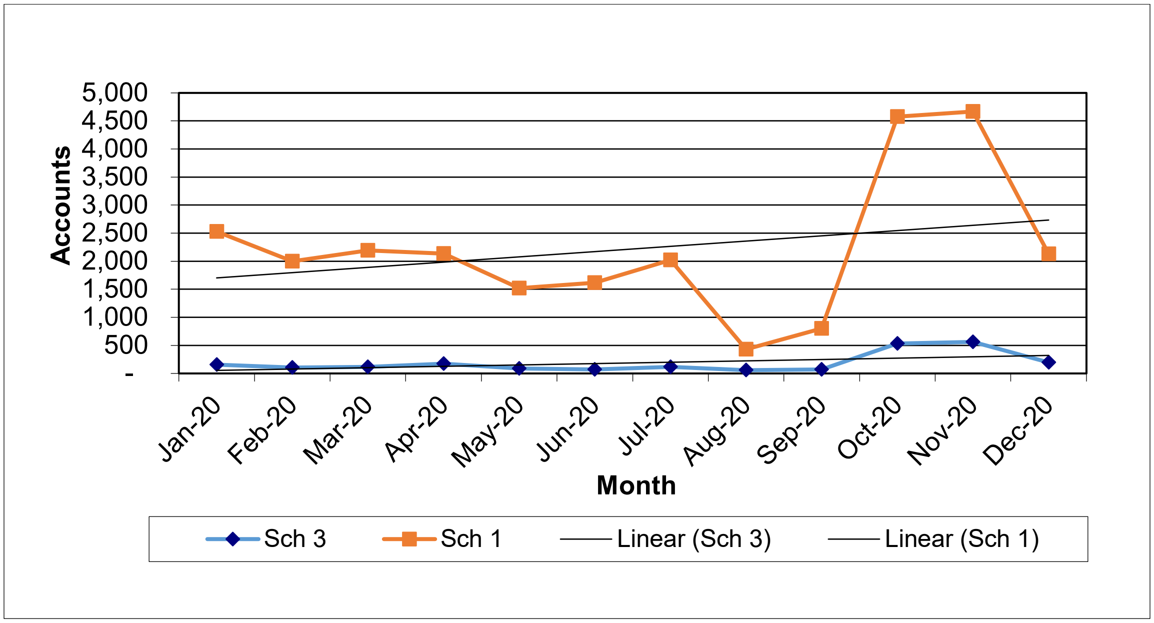
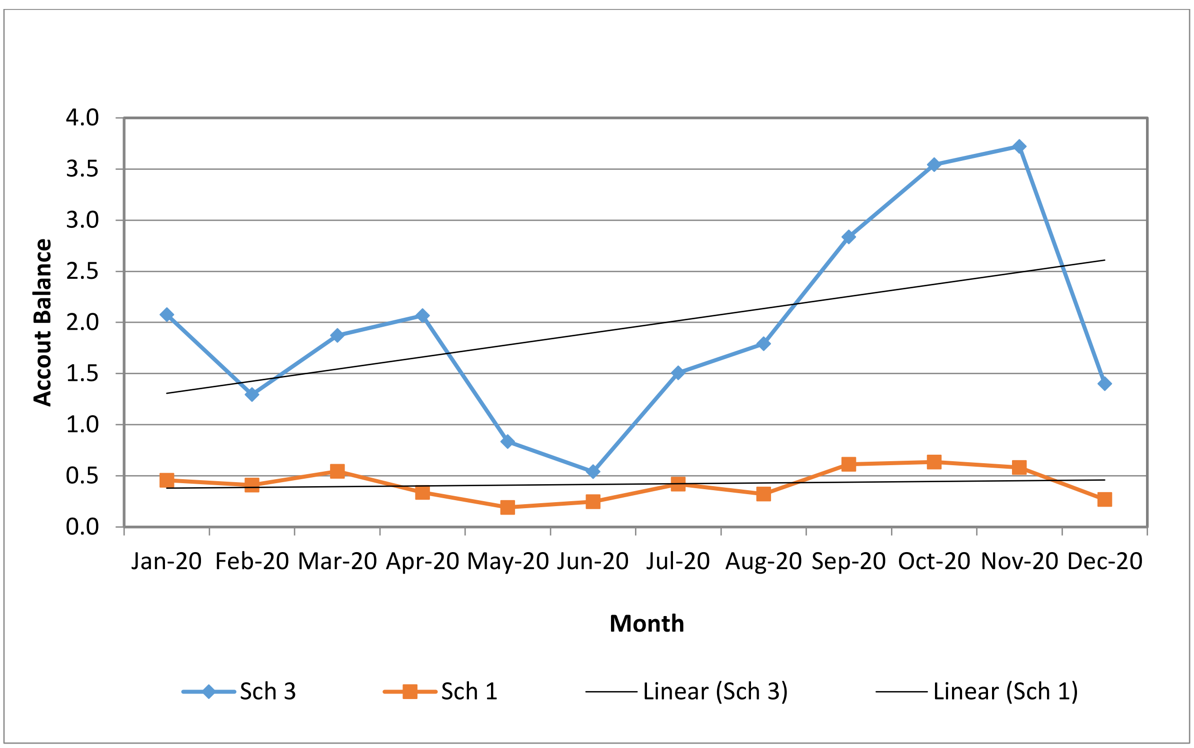


Figure 8. Monthly Balances of the Accounts Sent to Collection



EVALUATION SUMMARY

The evaluation of the measures yielded mixed results. Of the ten measures adopted by the Division, six met their standards (three measures in the category of the measures that are useful and three of the measures in the category of limited value in determining the effectiveness and success of the program) and four failed to meet their standards (one in the category of the measures that are useful and three were measures categorized as having a limited value in determining the effectiveness of the HELP program). Table 4 shows the measure evaluation summary.

Table 4. Measure Evaluation Summary.

Measure Description	Outcome of Evaluation Meets or Exceeds Standard
Administrative Costs	Yes
Process Granting Credit	Yes
Process Collecting Surcharge	Yes
Ending Account Balance	No
Penetration Rate	Yes
Terminations	Yes
Recoveries Per Customer	No
Write-Offs	Yes
Balance in Arrears	No
Accounts Sent to Collection Agencies	No

Achieving Commission Goals

The measures' outcomes discussed above indicate that of the seven goals of the HELP program, only four have been achieved by the HELP program. The achievement of the remaining three goals of the HELP program was inconclusive. Table 5 shows the goals of the HELP program and their respective achievement status.

Table 5. Evaluation of HELP's Goals

Goal	Goal Achieved
Comply With Ordered Procedures	Yes
Provide Benefits to Low-Income Recipients	Yes
Administratively Simple and Easy to Administer	Yes
Not Overly Burden Other Customers	Yes
Provide Benefits to PacifiCorp	No
Provide Benefits to Ratepayers in General	No
Positive Impacts Outweigh Negative Impacts	No

CONCLUSION AND RECOMMENDATIONS

The HELP program was implemented to achieve certain goals. First, it should provide benefits to the low-income program recipients, PacifiCorp, and utility customers in general while not overly burdening non-recipient customers. Furthermore, the benefits that the HELP program provides should offset the negative impacts of the program. Second, the program should be administratively simple and comply with Commission ordered procedures on tariffs, certification, and administrative charges.

Of the ten measures the Division used to evaluate the HELP program, six have met or exceeded their associated standards, four measures failed to meet their associated standards (Ending Account Balance, Recoveries per Customer, Balance in Arrears, and Accounts sent to Collection Agencies,) three of the failing measures are among the group of measures categorized as having limited value and one is among the group of measures categorized as being useful in determining the effectiveness of the HELP program.

Over Calendar Year 2020 of the program, HELP provided benefits to the recipients in the amount of $3,348,506. However, the Division has been unable to find demonstrable benefits accruing to either PacifiCorp or ratepayers in general. Without stronger evidence, the Division must conclude that the evaluation of the above listed goals is inconclusive.

Though HELP collected about $3,203,968 from non-recipients, the average monthly residential bill is $78.25 and the monthly residential surcharge under Schedule 91 is $0.16. This indicates that the non-recipient monthly surcharge represents 0.20% of the average monthly residential bill. Based on this it appears that the amount of money collected from the non-recipient customers under Schedule 91 is not overly burdensome.

Finally, the ending account balance for Calendar Year 2020 was $1,779,587, which is more than three months-worth of surcharge collections. Hence, to bring the ending account balance down to its standard, the Division recommends to set the surcharge at zero for 6 months. This will bring the ending account balance down to $102,316, which is within the limit of the standard for this measure. The Division also recommends PacifiCorp to file tariff revisions to comply with this recommendation.

Therefore, the Division concludes that the program is administered well and the recipients are benefiting without overly burdening either the ratepayers or the Company. However, since some of the goals and measures failed to meet their respective standards, the Division concludes that the program evaluation is inconclusive in terms of the success and effectiveness of the program. The changes in some of the measures have been impacted by Covid, the Division will monitor those measures for consistency to their respective standards. Despite the inconclusive program evaluation, the Division recommends no further action at this point.