Agency / Utility Data Sharing: Low Income Programs

National Conference of Regulatory Attorneys May 7, 2024

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Pennsylvania Utility Law Project

PULP is a statewide legal services project of Regional Housing Legal Services and is a member of the Pennsylvania Legal Aid Network.

PULP's mission is to secure just and equitable access to safe and affordable utility services for Pennsylvanians experiencing poverty.

We work to achieve our mission by empowering individuals and communities through:

- Legal Representation, Groups, and Individuals
- Education and Training
- Policy Advocacy
- Supportive Services
- Consultation



Harnessing Data to Understand and Address Utility Insecurity

Utility Insecurity in Pennsylvania

Over **330,000** Pennsylvania households experienced an involuntary utility shut off in 2023 due to non-payment.

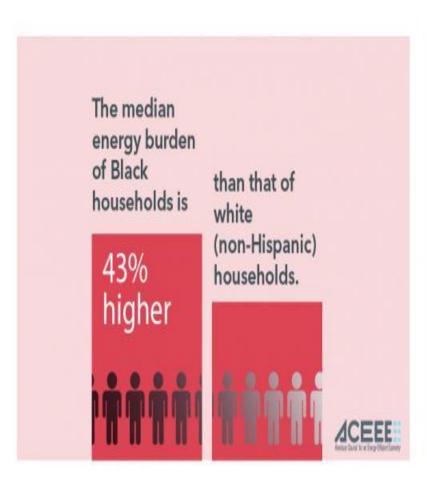
Over **20,000** Pennsylvania households entered winter without a safe heating source.

Over 14,000 were still without safe heat as of Feb. 2024.

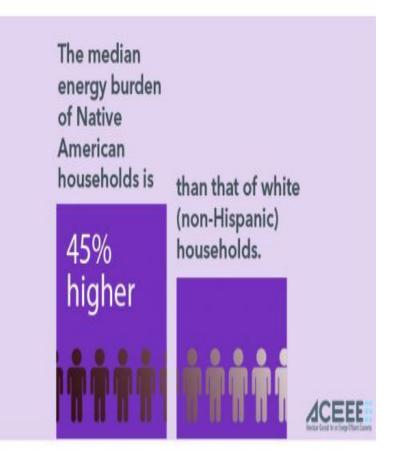


Pennsylvania Home Energy Affordability Gap

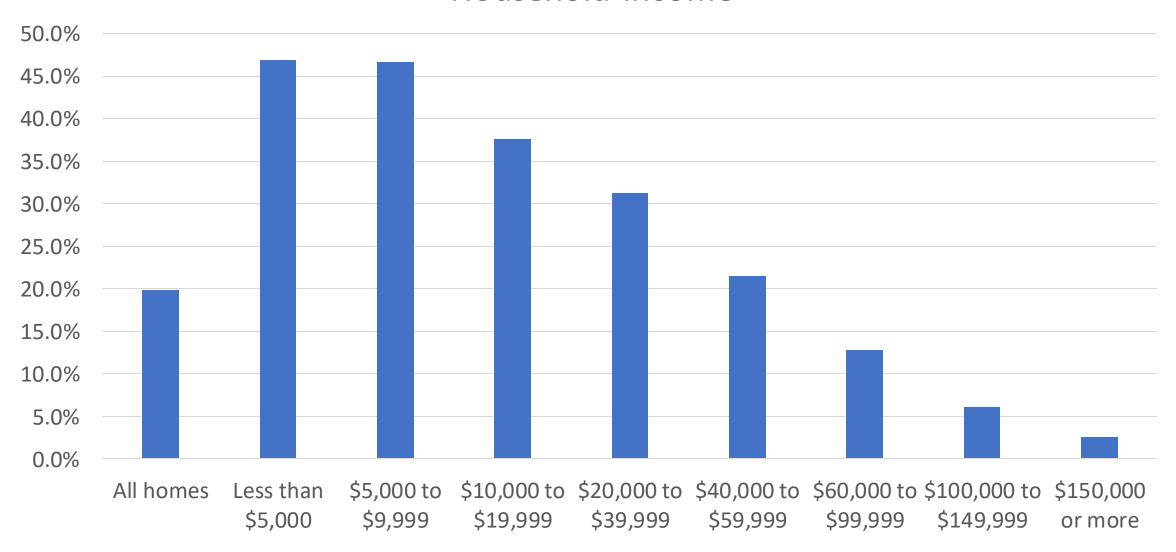
Federal Poverty Level	Home Energy Burden	# of Households
Below 50%	33%	282,747
50-100%	18%	329,656
100-125%	12%	183,370
125-150%	10%	192,284
150-185%	8%	285,880
185-200%	7%	129,934
Total		1,403,871

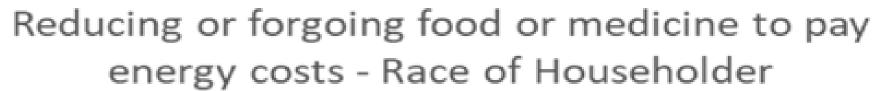


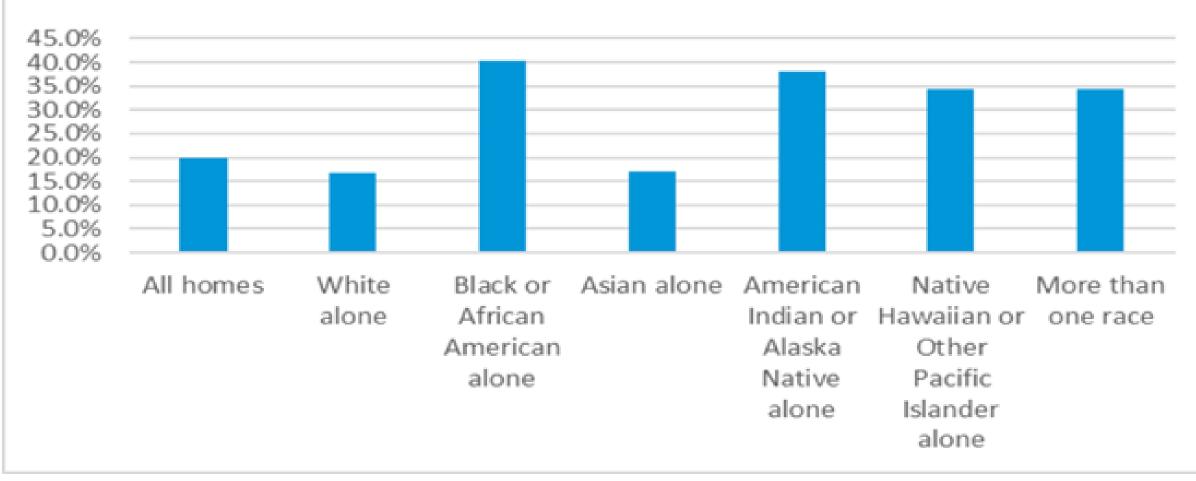
The median energy burden of Hispanic than that of white households is (non-Hispanic) households. ACEEE



Reducing or forgoing food or medicine to pay energy costs - Household Income



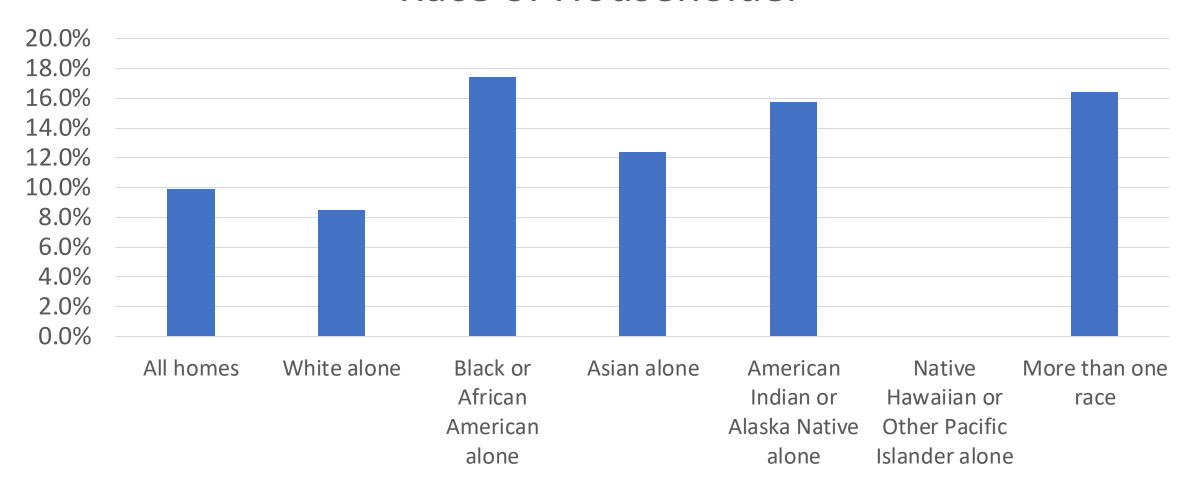


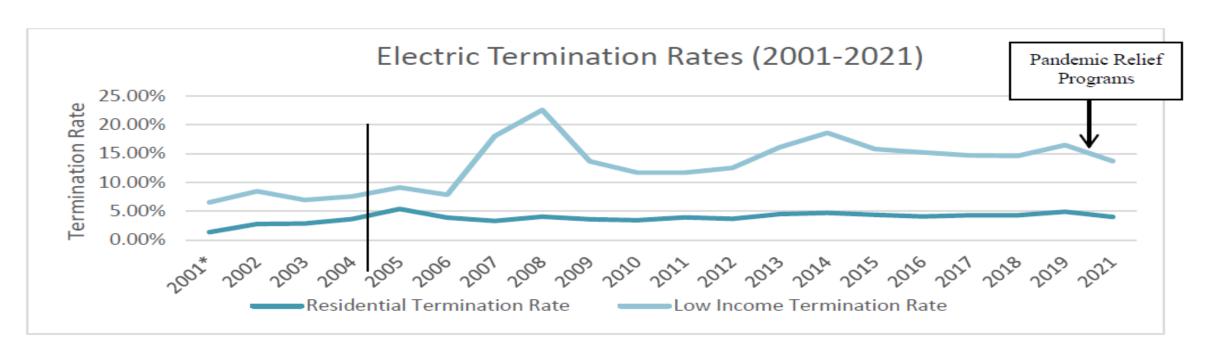


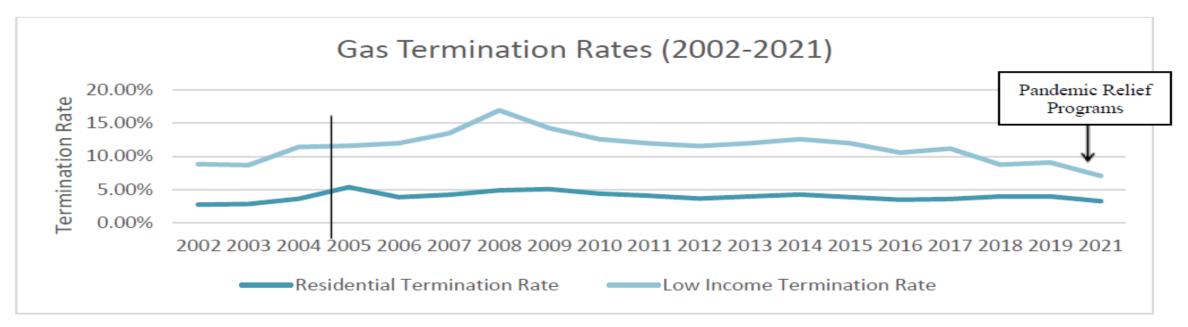
Leaving home at unhealthy temperature - Household Income



Leaving home at unhealthy temperature – Race of Householder







Confirmed Low Income Customer Debt

	Residential \$ In Debt	Confirmed Low Income (CLI) \$ In Debt	% Debt - CLI	CLI % of Residential Class
Electric	\$375,388,503	\$190,842,367	51%	12%
Gas	\$175,246,559	\$52,674,654	30%	15%

CAP Participation – Electric Utilities – 2020-2022

	20	20	202	21	2022		
Utility	Participants Enrolled as of 12/31/20	CAP Participant Rate	Participants Enrolled as of 12/31/21	CAP Participant Rate	Participants Enrolled as of 12/31/22	CAP Participant Rate	
Duquesne	33,638	70.6%	35,229	73.2%	38,092	74.5%	
Met-Ed	19,310	26.4%	21,280	36.7%	21,325	36.7%	
PECO-Electric	114,735	84.6%	121,408	86.1%	121,487	83.7%	
Penelec	25,345	28.1%	28,463	39.1%	28,988	39.8%	
Penn Power	5,546	27.9%	6,281	38.9%	6,835	41.9%	
PPL	65,862	34.0%	64,673	32.9%	68,949	34.6%	
West Penn	22,591	30.0%	24,792	39.3%	25,124	39.8%	
Total/Industry Average	287,027	45.2%	302,126	50.7%	310,800	51.3%	

CAP Participation - Natural Gas Utilities - 2020-2022

	202	20	202	21	2022		
Utility	Participants Enrolled as of 12/31/20	CAP Participant Rate	Participants Enrolled as of 12/31/21	CAP Participant Rate	Participants Enrolled as of 12/31/22	CAP Participant Rate	
Columbia	23,542	34.6%	24,459	35.9%	23,982	34.2%	
NFG	7,793	22.1%	7,201	25.7%	6,793	29.0%	
PECO-Gas	20,188	77.0%	21,776	79.2%	22,334	77.1%	
Peoples	31,202	28.7%	32,421	29.9%	28,367	26.3%	
PGW	55,497	41.5%	53,466	48.4%	50,385	43.8%	
UGI Utilities – Gas	24,236	31.3%	22,493	28.7%	19,914	23.4%	
Total/Industry Average	162,458	36.1%	161,816	38.4%	151,775	35.2%	

Monthly Average Percent Electric CAP Participation by Poverty Level - 2020-2022

		2020 2021 2022							
Utility	0%-50% FPIG	51%- 100% FPIG	101%- 150% FPIG	0%-50% FPIG	51%- 100% FPIG	101%- 150% FPIG	0%-50% FPIG	51%- 100% FPIG	101%- 150% FPIG
Duquesne	20.5%	49.6%	29.9%	21.6%	48.0%	30.4%	25.7%	46.7%	27.6%
Met-Ed	27.6%	42.5%	29.9%	31.9%	40.4%	27.7%	35.7%	38.3%	26.0%
PECO-Electric	23.4%	48.5%	28.1%	25.2%	47.5%	27.3%	28.1%	45.3%	26.6%
Penelec	21.1%	47.2%	31.7%	24.9%	45.4%	29.7%	28.5%	43.8%	27.6%
Penn Power	21.5%	44.9%	33.6%	25.3%	43.4%	31.4%	30.5%	42.2%	27.2%
PPL	17.0%	45.5%	37.5%	18.9%	42.6%	38.5%	22.8%	43.0%	34.3%
West Penn	24.1%	45.0%	30.9%	28.0%	43.0%	28.9%	31.4%	41.6%	26.9%
Total/Industry Average	21.7%	47.2%	31.1%	24.1%	45.3%	30.6%	27.6%	43.9%	28.5%

DHS - LIHEAP Weekly Energy Assistance Reports

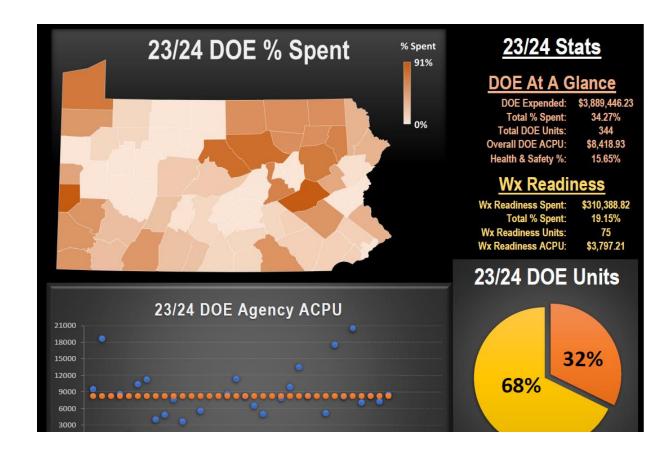
- Statewide and County-Specific
- Housing Type
 - Renter
 - Homeowner
 - Subsidized
- Race
- Disability Status
- Children Under 5
- Adults Over 60
- Heating Type
- Income Range
- Average Grant

HOUSING Owner 109,041 \$38,875,866 39 \$357 PAYMENT SENT Electric 97,304 \$36,943,650 35	% AVG 5 \$380 7 \$369
STATE WIDE Cash Demographic Report (LIH660-R01) ITEM COUNT AMOUNT % AVG ITEM COUNT AMOUNT 9 HOUSING Owner 109,041 \$38,875,866 39 \$357 PAYMENT SENT Electric 97,304 \$36,943,650 35	5 \$380 7 \$369
Cash Demographic Report (LIH660-R01) ITEM COUNT AMOUNT % AVG ITEM COUNT AMOUNT 9 HOUSING Owner 109,041 \$38,875,866 39 \$357 PAYMENT SENT Electric 97,304 \$36,943,650 35	5 \$380 7 \$369
ITEM COUNT AMOUNT % AVG ITEM COUNT AMOUNT 9 HOUSING Owner 109,041 \$38,875,866 39 \$357 PAYMENT SENT Electric 97,304 \$36,943,650 35	5 \$380 7 \$369
HOUSING Owner 109,041 \$38,875,866 39 \$357 PAYMENT SENT Electric 97,304 \$36,943,650 35	5 \$380 7 \$369
	\$369
Renter 128,996 \$48,973,120 46 \$380 FuelOil 47,107 \$17,400,721 17 RenterWithHeat 2.937 \$567.238 1 \$193 Coal 1.414 \$492.855 1	
RenterWithHeat 2,937 \$567,238 1 \$193 Coal 1,414 \$492,855 1 SubsidizedWithHeat 35 \$11.698 0 \$334 NaturalGas 118.465 \$43.086.814 42	
Subsidized No Heat 34,198 \$13,280,209 12 \$388 Kerosene 2,331 \$862,569 1	
Roomer 158 \$43,584 0 \$276 Propane 10,670 \$3,821,310 4	
Other 3,710 \$1,530,002 1 \$412 WoodOrOther 1,172 \$442,342 0	
Blended Fuel 612 \$231.456	
RACE AmericanIndian 805 \$329.829 0 \$410 INCOMERANGE 0 - 999 15,997 \$15,793,209 6	
Other 25.175 \$9.398.679 9 \$373 1000 - 1999 2.418 \$2.402.835	\$994
NativeHawaiian 509 \$220,181 0 \$433 2000 - 2999 2,361 \$2,279,810	\$966
Black 62,530 \$23,857,303 22 \$382 3000 - 3999 2,799 \$2,270,272	\$811
White 180,265 \$65,893,574 65 \$366 4000 - 4999 3,097 \$2,253,865 1	\$728
Asian 5,316 \$1,853,983 2 \$349 5000 - 5999 2,969 \$1,737,990 1	\$585
Unknown 4,475 \$1,728,168 2 \$386 6000 - 6999 3,156 \$1,616,970 1	\$512
DISABLED YES 80,140 \$24,611,197 29 \$307 7000 - 7999 4,275 \$1,908,547 2	\$446
NO 198,935 \$78,670,520 71 \$395 8000 - 8999 3,896 \$1,525,415 1	\$392
AGE 60 & ABV YES 122,711 \$38,977,749 44 \$318 9000 - 9999 5,280 \$1,799,432 2	\$341
NO 156,364 \$64,303,968 56 \$411 10000 - 10999 8,101 \$2,527,427 3	\$312
AGE 5 & BLW YES 48,329 \$19,345,800 17 \$400 11000 - 11999 42,794 \$12,839,837 15	
NO 230,746 \$83,935,917 83 \$364 12000 - 12999 11,779 \$3,515,188 4	
PAY_TYPE DIRECT 4,080 \$1,257,988 1 \$308 13000 - 13999 12,495 \$3,725,789 4	
PROVIDER 276,129 \$102,409,140 99 \$371 14000 - 14999 12,156 \$3,626,187 4	
15000 - 15999 12,649 \$3,771,163 5	
REFUNDS 8,336 \$2,014,085 \$242 16000 - 16999 13,837 \$4,123,800 5	
17000 - 17999 13,068 \$3,900,000 5	
18000 - 18999 12,498 \$3,727,650 4 AVERAGE HOUSEHOLD SIZE; 3.06 19000 - 19999 12,211 \$3.643,200 4	
AVERAGE HOUSEHOLD SIZE: 3.06 19000 - 19999 12,211 \$3,643,200 4 > 19999 81,231 \$24,288,750 29	
* Counts, Amounts (\$), % and AVG from HOUSING, RACE, DISABLED, PAYMENT TYPE Regular 279,075 \$103,281,717	\$370
OVER-60 and INCOME RANGE category are from Regular payments only Reissue 127 \$40,282	\$317
Secondpay 906 \$310.125	\$342
** Counts, Amounts (\$), % and AVG from PAY_TYPE category are from All Underpay 76 \$23,610	\$311
Payment Types (Regular, Reissue, Secondpay, Underpay and Extraordinary) Extraordinary 25 \$11,395	\$456
TOTAL PMT 280,209 \$103,667,129	\$370
*** Counts, Amounts (\$), % and AVG from PAYMENT_SENT category are from All RECOUPMENTS 388 \$116,582	\$300
Payment Types (Regular, Reissue, Secondpay, Underpay and Extraordinary) NET PAID \$103,550,547	
PMT SUB TYPE APD 0 \$0	\$0
STD 280,209 \$103,667,128	\$370

DCED – Weatherization Assistance Program

Report	created:	05.18	202

	DOE - To Date					Wx Readiness - To Date						
Agency	Allocation	Total Balance	% Spent	Average Cost (per Unit)	% Health & Safety	Units Completed	Estimated Units per Budget	Allocation	Total Balance	% Spent	Average Cost per Unit	Units Completed
Action Housing, Inc.	1,456,690.00	703,404.17	51.71%	9,496.64	20.25%	53	134	151,912	98,296.62	0.00%	8,943.67	5
Agency for Community EmPOWERment of NEPA	336,182.00	120,158.25	64.26%	18,639.18	5.83%	10	33	30,514	27,329.00	0.00%	3,185.00	1
Armstrong County Community Action Agency						0	0	13,666	8,541.47	37.50%	0.00	0
Berks Community Action Program	363,653.00	173,412.15	52.31%	8,635.85	17.04%	16	33	46,029	40,562.28	11.88%	4,691.22	1
Blair County Community Action Program	234,463.00	231,633.52	1.21%	1,186.82	19.20%	2	21	20,449	18,041.88	11.77%	2,407.12	1
Bucks County Opportunity Council, Inc.	335,653.00	222,782.82	33.63%	10,401.28	11.41%	9	31	38,561	35,136.00	8.88%	3,425.00	1
Carbon County Action Committee for Human Svs	153,117.00	92,674.09	39.47%	11,265.16	12.06%	4	14	12,367	5,898.56	52.30%	1,828.37	3
Center for Community Action	522,731.00	400,306.35	23.42%	4,007.86	17.40%	18	46	57,272	57,010.31	0.46%	0.00	0
Central Pennsylvania Community Action, Inc.	334,055.00	273,428.09	18.15%	4,874.54	29.62%	8	31	33,492	33,492.00	0.00%		0
Commission on Economic Opportunity	454,611.00	139,022.71	69.42%	7,668.32	18.11%	33	42	42,480	42,480.00	0.00%		0
Community Action Agency of Delaware County	1,543,786.00	1,514,723.68	1.88%	3,659.56	32.36%	6	143	203,141	190,014.30	6.46%	2,010.28	6
Community Action Committee of Lehigh Valley								71,413	37,011.85	48.17%	5,408.36	6
Community Action Partnership of Mercer County	324,011.00	280,836.36	13.33%	5,600.88	7.98%	7	30	38,484	10,751.63	72.06%	5,960.59	4
Community Action, Inc.								24,663	15,017.47	39.11%	8,555.65	1
Energy Coordinating Agency								245,201	189,656.00	22.65%	3,267.35	17
Erie County Housing Authority	415,517.00	121,167.16	70.84%	8,587.30	16.71%	26	41	40,731	37,747.88	7.32%	1,241.56	2
Housing Authority of the County of Beaver	223,205.00	20,459.38	90.83%	11,372.65	20.74%	11	21	22,192	22,192.00	0.00%		0
Lawrence County Community Action Partnership	186,057.00	107,150.16	42.41%	8,242.43	16.40%	7	18	16,842	16,302.09	3.21%	0.00	0
Lycoming/Clinton Counties Comm Cty Action	252,976.00	55,484.06	78.07%	6,531.93	22.43%	23	23	29,327	10,917.06	62.77%	1,300.31	13
Monroe County Redevelopment Authority	197,964.00	190,226.65	3.91%	5,032.41	33.68%	1	18	22,253	22,253.00	0.00%		0
Northern Tier Community Action Corp.	259,467.00	259,467.00	0.00%				24					
Northumberland County Weatherization	207,304.00	74,710.93	63.96%	7,906.49	3.65%	15	20	17,277	116.58	99.33%	8,128.00	2
Northwest Pennsylvania Weatherization, Inc.	196,398.00	97,410.31	50.40%	9,900.50	8.07%	8	18	17,184	17,184.00	0.00%		0
Redevelopment Auth of the County of Fayette	249,852.00	185,950.91	25.58%	13,488.87	9.59%	4	26	22,993	22,993.00	0.00%		0
Schuylkill Community Action	217,056.00	21,902.99	89.91%	8,295.28	10.81%	16	21	22,008	22,008.00	0.00%		0
SEDA-Council of Governments	438,913.00	438,913.00	0.00%				42	72,462	62,010.19	14.42%	3,318.03	3
South Central Community Action Program Inc.	660,314.00	595,062.94	9.88%	5,184.70	24.51%	10	63	88,743	87,785.00	1.08%	0.00	0
Tableland Services	172,434.00	84,801.30	50.82%	17,541.68	4.05%	4	20	14,949	14,946.00	0.00%	0.00	0
The Trehab Center	352,006.00	154,748.40	56.04%	8,184.85	10.24%	19	35	55,337	49,281.00	10.94%	5,562.94	1
Warren/Forest Counties EOC	245,014.00	220,448.92	10.03%	20,502.38	10.49%	1	23	33,316	32,993.00	0.97%	0.00	0
Wavne County Redevelopment Authority	212.418.00	143.152.89	32.61%	7.100.65	12.04%	8	20	24.452	23.622.45	3.39%	276.52	3

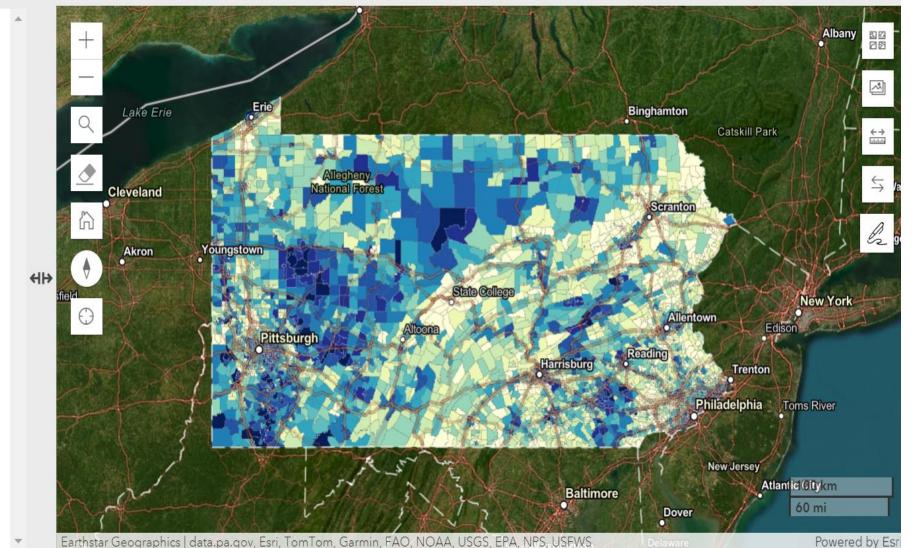


DEP – Environmental Justice Areas, 32 Indicators

pennsylvania
DEPARTMENT OF ENVIRONMENTAL PROTECTION

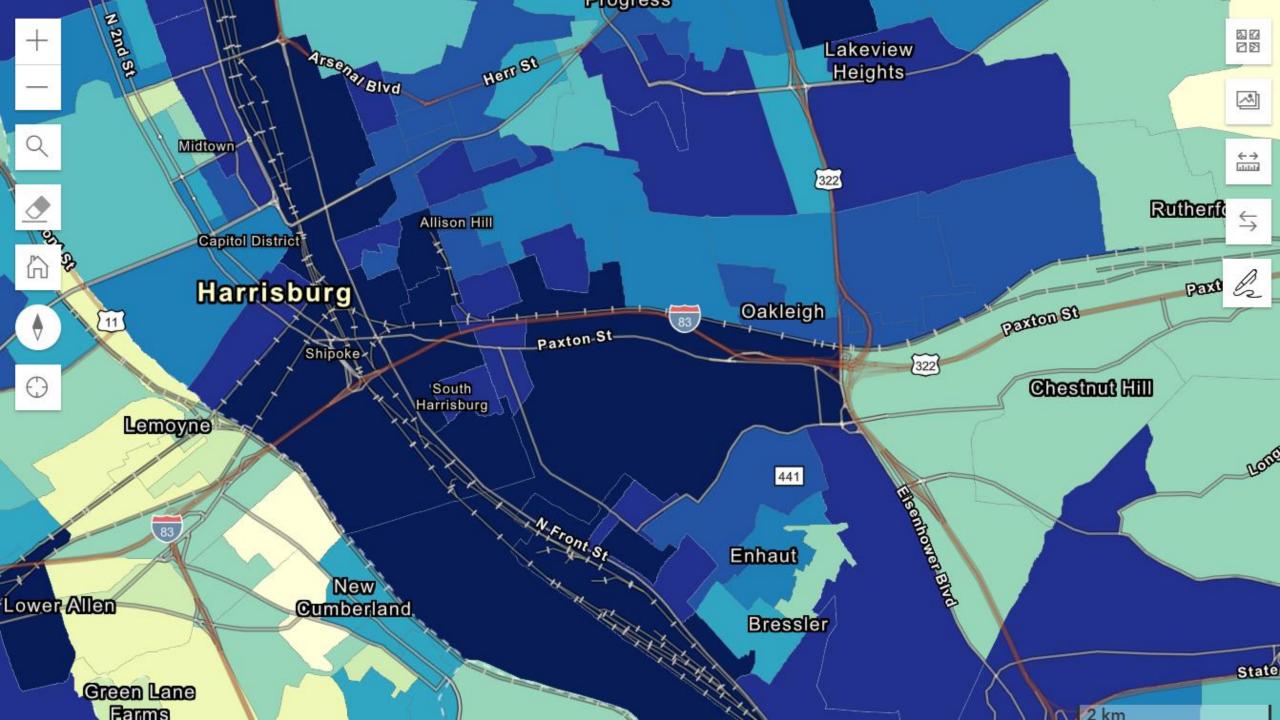
PennEnviroScreen DEP

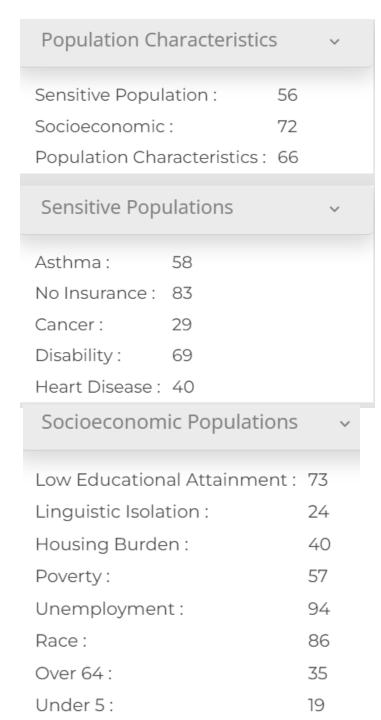
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☑ Print	>
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☐ Bookmarks	>



Feedback

About





Final Score Percentile:	96	
EJ Area :	Yes	
Pollution Burden		~
Exposure:	98	
Environment Effects: 9	94	
Pollution Burden:	99	
Environmental Expos	ures	~
Ozone:	31	
PM25:	95	
Diesel PM10:	70	
Toxic Air Emissions:	81	
Toxic Water Emissions:	81	
Pesticide:	62	
Traffic:	99	
Compressor Stations :	0	
Children's Lead Risk:	11	

Environmental Effects	~
Conventional Oil Gas Well :	0
Unconventional Oil Gas Well:	0
Railroads:	62
Land Remediation :	98
Hazardous Waste and Storage Sites :	99
Municipal Waste :	100
Coal Mining :	0
Impaired Lakes and Streams :	67
Mining Concerns:	0
Flood Risk :	18



LIHEAP / Utility Data Sharing Policy

Led by LIHEAP Advisory Committee to DHS (LAC)

- First Formal LAC Data Sharing Subcommittee Meeting: April 2018
- Included Both Formal Members and Stakeholders:
 - PUC, DCED, Consumers, Service Agencies, Utilities / Trade Associations
- Initial Goals:
 - Identify Information Utility Vendors Need
 - Identify How Information Obtained/Received
 - Identify Barriers to Providing Information / Whether Barriers Can be Overcome
 - Identify Consumer Privacy Concerns
 - Identify Next Steps within DHS, Utilities, PUC

LIHEAP / Utility Data Sharing Policy

Developed <u>Consensus</u> Recommendations

- List of Agreed-to-Data Points
 - Name of utility account holder
 - Name of all household members, regardless of the household member's eligibility for LIHEAP
 - Income (annual or monthly) for all household members
 - Source of income for all household members (e.g. employment, Social Security, etc.)
 - Date income was verified
 - Service address
 - Account number (or other unique identifier) for head of household
 - Age or DOB of all household members (USRR reporting requirement)
 - Telephone number
 - Email address
- Must Obtain Opt-In Consent
- Strict Limits on the Use and Application of Data
 - "Singular purpose" to streamline enrollment / facilitate outreach

Reviewed Implementation Documents

- Consumer Consent "Check-Box"
- Data Sharing Agreement
- Implementation Target: Fall 2024

PUC Policy Advancement

SW Pennsylvania Common Application Working Group

- Community leaders at Pittsburgh United, with help of PULP, organized individual meetings and regional roundtables with SW Utility leaders
 - Goal: Build on Work of LAC to Identify Barriers to Common Application
 - Outcome: Developed Common Application Template

PUC Universal Service Working Groups

- Working Groups met from October 2023 through January 2024
 - Data Sharing
 - Common Application
 - Statewide Administration
 - Website / Statewide Application Portal
- Working Group Report Filed with PUC in March

Other Emerging Data Sharing Examples

- Philadelphia City / Water Department
 - Municipally Owned Utility
 - Data Agreement Water Rate Case
 - Enrolled over 30,000 in Tiered Assistance Program
- Dep't of Human Services / Low Income Household Water Assistance
 - Executed Data Sharing Agreements with Public and Private Water
 - Waiting for Data to be Shared
- Pittsburgh Water / Sewer Authority / Allegheny County DHS
 - Rate Case Settlement Terms
 - Must Explore Coordination Opportunities
- Utilization of Mapping Tools for Targeted Outreach / Programming
 - Prioritization of Lead Line / Stormwater Projects
 - Targeted Mailings / Outreach Events

...And of course...Inflation Reduction Act Programs!!

Effective Cross-Sector Collaboration

- Strong Directives from Agency / Administration Leadership
- Established Channels for Communication
- Accessible to Community Leaders / Service Agencies
- Clear Timeline and Stated Goals
- Established Decision-Making (Consensus / Majority)
- Manageable Agendas
- Realistic Objectives
- Active and Empowered Subcommittees

3 Components of Effective Program Design

Bill Discount

- Sets bill at an affordable rate.
- Benefits: Increased bill payment and bill coverage rates.
- Possible Structures:
 - Percentage of Income
 - Percentage of Bill
 - Discount on Specific Charges

Arrearage Management

- Offers an alternative collections method to reasonably resolve debts accrued before program enrollment
- Benefits: Reduced uncollectible expenses and improved bill payment and bill coverage rates.
- Possible Structures:
 - Percentage of arrears forgiven with each payment
 - Set amount of forgiveness with each payment

Conservation / Leak and Line Repair

- Provides free conservation and leak repair services to help control program costs and prevent
- Should target high-usage customers within bill discount / arrearage management programs.

Contact PULP

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