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Roth, J. & Nick H. (2010) An Evaluation of the Experimental Low Income Program: Results of Process and Arrearage Effects Evaluations. Prepared for Empire District Electric Co. *TechMarket Works*. Located in the rebuttal testimony of Empire witness Sherrill L. McCormack, schedule slm-2. ER-2010-0130.

- Tier 1 – Annual income from 51 to 125% of the federal poverty level (up to \$20 per month).
 Tier 2 – Annual income from 0 to 50% of the federal poverty level (up to \$50 per month).
 - As the program is currently designed, a single person getting \$674 from a monthly Social Security payment would be placed into Tier 1 and only eligible for a \$20 monthly credit.
 - The information provided by the website is not listed under programs offered by Empire in Missouri, and cannot be found on either of the CAP agency websites.
 - Customers may want to let their utility bill rise to a high level of arrearage and receive a notice of disconnection. When this occurs, they can often qualify for temporary emergency relief through the Emergency Crisis Intervention Program, which will provide a larger credit to their bill.
 - Levelized payment plan is a requirement for participation. This plan takes away the emergency relief option away.
- Programs Federal Poverty Level guidelines are not in line with other low-income programs offered through Missouri’s CAP agencies, and are keeping low-income customers receiving Social Security Income out of the program’s Tier 2 benefits which provide higher bill credits.
- The results of the Low Income Public Purpose Test is 0.22 the ELIP credit is used as a non-energy benefit to the participant. Removing this participant benefit from the equation, the test result drops to 0.01. This program, like many most low income programs, is essentially a subsidy to the customers that participate.
 - The results of the Low Income Public Purpose Test will vary depending on the input values and the length of time that NEBs (non-energy benefits) are considered to be in effect.

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Brockway, N., et al. (2014) Low-Income Assistance Strategy Review: Options for the design and implementation of ratepayer-funded assistance programs for low-income electricity customers. Prepared for the Ontario Energy Board. *Synapse Energy*. <http://www.synapse-energy.com/sites/default/files/Low-Income-Assistance-Strategy-Review-14-111.pdf>

It is possible to charge less to a customer group and receive more revenue.

Table 1. Billings and Revenues under Utility Rate Affordability Program – Citizens Gas and Coke (2007)

Population	Billed Revenue	Collected Revenue	Collected Revenue / Billed Revenue
Customers on Discounted Rates	\$273,527	\$215,897	79%
Customers on Standard Rates	\$304,072	\$194,577	64%
Ratio of customers on Discounted Rates / Standard Rates	0.90	1.11	

Additionally: Xcel Pilot Energy Assistance Program in Colorado (PEAP) found that program participants paid two-thirds of their current bills, whereas PEAP-eligible non-participants paid slightly over half of their billing. Rather than collecting only \$533,684 from customers without the PEAP rates, Xcel Energy collected \$701,278 from customers enrolled in PEAP. . . . Similar results have been seen in programs in New Jersey and Pennsylvania.

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Empire Average (2015)

13,775 kWh Annual Residential Average

1,147 kWh Monthly Residential Average

National Average (2014 EIA)

10,932 kWh Annual Residential Average

911 kWh Monthly Residential Average

2015 Empire Residential Customer Energy Survey

Percentage Overall	Percentage Overall	33% Low 0 to 8,850	34% Medium 8,851 to 15,750	33% High + 15,751
77%	Own Residence	28%	34%	38%
23%	Rent Residence	48%	35%	17%
20%	1 Person in household	58%	29%	13%
40%	2 People in household	33%	38%	29%
40%	3+ People in household	20%	33%	47%
81%	Single-family detached house	30%	34%	36%
4%	Single-family house attached to others	45%	38%	17%
4%	Multi-family with 2-4 apartments/units	58%	38%	4%
4%	Multi-family with 5+ apartments/units	64%	32%	4%
6%	Mobile/Manufactured home	26%	29%	45%
13%	Home less than 1,000 square feet	57%	31%	12%
34%	1,000 to 1,499 square feet	38%	39%	23%
25%	1,500 to 1,999 square feet	25%	37%	38%
19%	2,000 to 2,999 square feet	21%	30%	49%
9%	Home is more than 3,000 square feet	21%	21%	58%
26%	Home is built prior to 1970	40%	36%	24%
23%	1970-1989	31%	35%	34%
19%	1990-1999	28%	32%	40%
24%	2000-2009	22%	35%	43%
8%	2010 to present	39%	30%	31%
30%	Annual Household income < 30K	45%	33%	23%
27%	30K - 49K	33%	40%	27%
23%	50K - 74K	25%	35%	40%
20%	75K +	23%	39%	48%

W. J. ...
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