

Alimony/Child Support Form



- To be used when there is no formal agreement
 - Court order/decreed, print out from DSS Child Support, etc.
- To be signed by the custodial parent **and** the individual paying the support
 - May be signed by custodial parent only if the one paying the support cannot sign

Self-Employment Policy



- IRS Schedule SE
- For applicants who have not filed taxes, but still consider themselves self-employed must provide the following for the last 30 days:
 - Weekly, monthly, and/or quarterly books/statements, ledgers, sales slips, cancelled checks, invoices, bank statements/deposits
- Income Verification of Self-Employment Form
 - This form is required in addition to the IRS tax forms

Zero Income



- Zero Income **Individual**

- All household members 18 years and older who claim zero income:

- *Declaration of Zero Income* form must be signed
 - All individuals claiming zero income must be screened for income and verified by the local OHEP agency

- Zero Income **Household**

- In addition to the Declaration of Zero Income form:

- *Household Worksheet* must be completed
 - *Resource Provider Statement* form to be completed for any persons or organizations that have provided assistance
 - Government assistance should be documented by award letters

Household Worksheet



- Must be completed by applicant if the entire household is reporting zero income in the past 30 days
- States how basic needs are being met for things like:
 - Shelter
 - Food
 - Utility
 - Transportation
 - Other Non-food items (clothes, personal items etc.)
 - Additional comments
- The first three basic needs (shelter, food, and utilities) must be documented and verified

Resource Provider Statement



- Must be completed if the entire household is reporting zero income in the past 30 days and a person or organization outside the household has provided financial support
 - E.g. Church, friend, non-profit organization
- Form is completed by the resource provider, not the applicant
 - E.g. if church gave a charitable donation, the form should be completed by the church

Missing Information



- Customers and Navigators will receive a formal Request for Additional Information for missing documentation
- Notices will indicate the date information must be sent in before application will be denied (15 days from notice date)



Proxy Authorization Form



- To be used if applicant is physically or mentally unable to complete the application
- Proxy must be 18+ years old
- Must be signed by the applicant, proxy and a witness
- Power of Attorney may also be used to submit an application on someone's behalf

Eligibility Determination Notice



- Notification of eligibility for energy assistance
 - Approved
 - Notice is mailed to the applicant listing benefit amount(s) for electric (EUSP), heating (MEAP), and Arrearage assistance
 - Denied
 - Notice is mailed to the applicant listing reason for denial and customer appeal rights
 - Customer may reapply 30 days from the date of the denial notice
 - Customer may request a fair hearing within 30 days form the date of the denial notice



Pop Quiz!



Q6

Mr. Smith and his wife are applying for Energy Assistance. Mr. Smith is unable to work due to his medical condition and receives SSI Disability Benefits while his wife works at Food Lion. The Smiths last received Energy Assistance in 2008 when they fell on hard times because Mrs. Smith was laid off from her job. Mr. Smith has provided his Navigator with copies of his and Mrs. Smith's IDs, copies of their social security cards, a copy of Mrs. Smith's 4 most recent pay stubs, a copy of their utility bill, a completed application, and a signed Physician's Certification form. Unfortunately, Mr. Smith is not able to find his most recent benefit award letter, instead he has provided a copy of his SSA-1099 tax form for last year. Is the application complete?

Answer



Yes. While the most recent SSI benefit award letter would give the OHEP worker his current monthly payment directly, the OHEP worker can use the 1099 form to calculate Mr. Smith's current monthly benefits.

Pop Quiz!



Q7

Mrs. Johnson is applying for Energy Assistance. She is 75 years old and lives alone in the home she's owned for 30 years. She receives Social Security retirement benefits as her sole source of income. This is her first time applying for Energy Assistance after being diagnosed with cancer earlier this year. Mrs. Johnson is working with a navigator to apply for Energy Assistance through the CMNP. She provided the navigator with her completed application form, her most recent Social Security benefit award letter, a copy of her ID, and a completed Physician's Certification form. Is Mrs. Johnson's application complete?

Answer



Maybe. While Mrs. Johnson has not provided a copy of her Social Security Card or her utility bill, this information may be available within her other documents. Mrs. Johnson's Social Security award letter may include her Social Security number which would allow OHEP to verify her Social Security Number without having the card itself. As for the utility bill, if the address on Mrs. Johnson's ID is the same as the address listed on her application, then no further verification is needed for her address. However, this also assumes that Mrs. Johnson has provided her correct utility account number on her application.

Pop Quiz!



Q8

Ms. Dorsey is applying for Energy Assistance through the CMNP. She rents an apartment with her adult son Clifton. Ms. Dorsey works full time as a teacher, and her son is currently unemployed but not receiving unemployment benefits. Ms. Dorsey has provided her CMNP Navigator with a copy of her ID, both Social Security Cards, a copy of the utility bill, her 2 most recent paystubs (she is paid biweekly), and a completed Energy Assistance Application form. She has not provided any income documents for Clifton, but she did indicate that he is not receiving any income on her application. Is this a complete application?



Answer



No. The OHEP worker will need Clifton to fill out a “Declaration of Zero Income” form in order to certify that he is not receiving any income at this time. Once Clifton signs this form and provides it to the Navigator, the application packet will be complete.



OHEP Processes

IMPACT OF COVID-19

COVID-19 Changes/ Updates



- March 16- October 1: Moratorium on utility disconnections, late fees, and reconnection fees due to COVID-19 pandemic.
- Post moratorium protections from the Maryland Public Service Commission:
 - Turn off notices issued 45 days before disconnection (normally 15 days)
 - Utilities must offer payment plans with minimum terms of 12 months, or 24 months for Energy Assistance recipients. (normally payment plans range 3- 12 months regardless of income)
 - No down payments required for payment plans
 - No penalties for failed payment plan (typically a failed payment plan would preclude customers for 18 months)

What is OHEP Doing



- Early release of MEAP funds.
- Heavy reliance on redetermination process for FY 21.
- Improving forms mailout from the OHEP system.
- Prioritization of Energy Assistance in State DHS call Center.
- Suite of COVID specific informational documents and revised messaging on DHS website.
- LAAs performing outreach to their local communities through traditional and online channels.

What is next?

- OHEP will send you a Confidentiality Certification form in order to issue a Navigator Certificate, which is required to submit CMNP applications.
- OHEP will send you this presentation and important links for reference.
- Once notified, you can submit applications to CMNP.OHEP@Maryland.gov
- OHEP will send you applications and brochures electronically (you may request hard copies)



Additional Information:
dhs.maryland.gov/energy

To access application forms:
dhs.maryland.gov/energy-application

View status of applications at:
www.myohepstatus.org
1-800-332-6347

All CMNP applications and policy questions should be addressed to:

CMNP.OHEP@maryland.gov

DO NOT share this email address with customers

Critical Needs Client Utility Form (BGE)

Navigator: _____
 Date: _____ Phone: _____
 Email: _____
 Type of request (extension, restoration, other): _____

Navigator fill in Client Intake and Service Status

Client Intake

Client Name: _____ County/City: _____
 Address: _____ Phone: _____
 Utility Acct #: _____ Name on Account if different from Client: _____
 Children (under 2)?: Yes No Seniors in the home (over 65)?: Yes No

Medical Condition

Describe: _____ Equipment Required?: Yes No

Service Status

Turn Off Notice Expiration Date: _____ Date Service Turned Off (if service is off): _____
 Amount owed to BGE, if known: \$ _____ Service Used (Gas, Elec., both): _____
 Power On?: Yes No

For BGE Personnel

Medical Certification requested on: _____ Evidence of Fraud: Yes No
 Evidence of Theft: Yes No Details: _____

History of grants and programs:

EUSP Bill Assistance: Date: _____ Amount: \$ _____ EUSP Arrearage: Date: _____ Amount: \$ _____
 MEAP: Date: _____ Amount: \$ _____ Fuel Fund: Date: _____ Amount: \$ _____
 USPP enrolled?: Yes No
 Other: Source: _____ Date: _____ Amount: \$ _____

Amount owed (on all accounts): \$ _____

Payment history (four most recent payments within 12 month period, excluding current payment of assistance):

Date(s): _____ Amount of Customer Payment \$ _____
 Date(s): _____ Amount of Customer Payment \$ _____
 Date(s): _____ Amount of Customer Payment \$ _____
 Date(s): _____ Amount of Customer Payment \$ _____

OHEP

Need Appt?: Yes No
 Arrearage Available?: Yes No
 If No, Date received: _____
 Amount: _____
 Fuel Fund applied for/referred: Yes No
 OHEP App Ineligible: Yes No
 Reason Ineligible: _____
 OHEP Commitment Amounts:
 EUSP Bill Assistance _____
 Arrearage _____ MEAP _____

DSS

Need Appt?: Yes No
 Food Stamps needed?: Yes No
 EAFC: _____
 Flex Funds: _____
 Adult Services Grant: _____
 Comments: _____

Office of Aging

Grant?: _____
 Care giver grant: _____
 Comments: _____
 Other Agency Funding
 Agency: _____
 Grant Amt: _____

I confirm that the named client has provided permission for public utilities and social welfare agencies to release the information in this form to this Navigator for the limited purpose of facilitating utility bill payment assistance. Signature: _____

Navigator Critical Need Process

Emails arrive from Critical Medical Needs Navigators in agency@bge.com in box, seeking an extension or restoral for a customer with medical needs.

1. Account is NOT currently in Severance and is not coded Special Needs

a. Internet Team:

- i. Review the account to determine if Special Needs forms have been sent out *within the last 2 months*
- ii. If the Special Needs forms have never been sent:
 1. Follow the normal process to send Special Needs forms
 2. Reply by email to Navigator to advise of the 30-day hold and requirement to have the form signed by a qualified health care provider¹ and returned within 30 days
- iii. If more than 2 months have passed since forms have been sent
 1. Click the **Collection Process Active** in Alerts
 2. Click the **Cancel** button
 3. Click **OK** on warning message
 4. Navigate to the **Account** page **C&C** tab
 5. In the **Postpone Credit Review Until** field, enter the date 30 days out
 6. Click the **+** sign. In the **Start Date** field enter today's date. In the **Stop Date** field enter the same date as the **Postpone Credit Review Until** date
 7. In the **Comments** field enter – *30 day ext provided due to navigator request*
 8. Click **Save**
 9. Navigate to **Customer Contacts**
 - a. Locate the **Special Needs Certification New Participant Letter**
 10. Place a checkmark in the **Reprint Letter** box
 11. Click **Save**
- iv. If less than 2 months have passed
 1. Advise the Navigator extension denied
- v. Add a Customer Contact
- vi. **AFTER NOV. 12:** Add Critical Medical Needs characteristic (characteristic type "CRITMED") in the **Characteristics** tab of the **Account** page (*for tracking purposes*):

Effective Date	Characteristic Type	Characteristic Value
02-03-2012	Account Is Extracted Flag	<input type="checkbox"/> Yes
03-25-2015	Critical Medical Needs Program Customer	<input checked="" type="checkbox"/> Yes
02-26-1997	Deposit Refund Review Date	2013-02-14
02-14-2013	Deposit Refund Review Date	2014-02-14
02-14-2014	Deposit Refund Review Date	2015-02-14
09-14-2015	Deposit Refund Review Date	2016-02-14
12-28-2011	Legacy Account	5561440070
02-02-2012	Special Needs Patient Name	Angela Johnson
03-04-2013	Returned Check - Charged Back to Account	<input type="checkbox"/> Yes
04-02-2013	Returned Check - Charged Back to Account	<input type="checkbox"/> Yes
10-10-2013	Smart Energy Manager Control Group Status	RECIPIENT <input type="checkbox"/> Account has full access
02-03-2012	Special Needs Certification Letter Sent	<input checked="" type="checkbox"/> Yes
02-02-2012	Special Needs Relationship to Customer	Self
02-02-2012	Special Needs Requested	LIFESUP_CRITICAL <input type="checkbox"/> Life Support/Critical Illness
03-19-2012	Special Needs Status	UNCONFIRMED <input type="checkbox"/> Unconfirmed

¹ A licensed physician or certified nurse practitioner

Navigator Critical Need Process

2. **Account is NOT currently in Severance, however the account is already coded Special Needs**
 - a. **Internet Team:**
 - i. Review the account to determine if a medical extension has been granted within the last 2 months
 - ii. If more than 2 months:
 1. Click the **Collection Process Active** in Alerts
 2. Click the **Cancel** button
 3. Click **OK** on warning message
 4. Navigate to the **Account page C&C** tab
 5. In the **Postpone Credit Review Until** field, enter the date 30 days out
 6. Click the **+** sign. In the **Start Date** field enter today's date. In the **Stop Date** field enter the same date as the **Postpone Credit Review Until** date
 7. In the **Comments** field enter – **30 day ext provided due to Navigator request**
 8. Click **Save**
 9. Advise Navigator of extension date
 - iii. If less than 2 months:
 1. Advise the Navigator extension denied
 - iv. Add a Customer Contact
 - v. Add CRITMED Characteristic (*tracking purposes*)
3. **Account is in Severance**
 - a. **Internet Team:**
 - i. Call 4032 to determine if **Severance** can be cancelled
 - ii. If over 4 min wait, IM Marvin Guthrie, Kiesha Anyim or Felicia Pearce
 - b. **Collections Team**
 - i. Review the status of the field activity
 - ii. If account is in **Received** or **Assigned** status
 1. Cancel the **Severance** process
 2. Advise the Internet rep the Severance has been called
 - iii. If in **Accepted** or **En Route** status
 1. Contact dispatch to have job cancelled
 2. Ensure that the dispatcher has contacted the tech to have the job pulled before prior to ending the call and canceling the job (this will avoid a COIE)
 3. Advise the Internet rep of the status of **Severance**
 - c. **Internet Team:**
 - i. Reply by email to Navigator to advise of the status of **Severance**
 - ii. Add a Customer Contact
 - iii. Add CRITMED Characteristic (*tracking purposes*)
4. **Service OFF**
 - a. **Internet Team:**
 - i. Review Navigator's request/proposal
 - ii. If commitments sufficient for restoral:
 1. Issue order to restore service
 2. Add Customer Contact
 3. Add CRITMED Characteristic (*tracking purposes*)

Navigator Critical Need Process

- iii. If commitments are insufficient
 - 1. Forward e-mail to NavigatorInquiryMailbox@exeloncorp.com
- iv. Add a Customer Contact
- b. Collections Team
 - i. Review the account to determine if service can be restored
 - ii. Respond/Contact Navigator directly to advise of decision or what is needed to have service restored
 - iii. Add Customer Contact
 - iv. Add CRITMED Characteristic (*tracking purposes*)
- 5. Service OFF due to Theft
 - a. Internet Team
 - i. Advise Navigator service off due to Theft and that request will be forwarded to Revenue Protection to calculate charges due
 - ii. Send an e-mail to TOERevenueProtecti@exeloncorp.com
 - 1. In the subject line include "Medical Navigator"
 - 2. Include in the body of the e-mail: Customer's full name, the address where they are trying to receive service, the Navigator's name and e-mail address
 - b. Revenue Protection
 - i. Calculate charges and respond by email directly to the Navigator within 24 hrs

Maryland Office of People's Counsel

Energy Services Pilot

Background

During the 2015 Maryland General Assembly session, Chairman Middleton and Senator Benson of the Senate Finance Committee requested that OPC, Cindy Carter (Cancer Support Foundation), the Public Service Commission and Maryland utilities¹ meet with Committee members to address concerns about assisting medically vulnerable customers with continuation and restoration of utility services, especially during the winter.

At the meeting, Ms. Carter presented her concerns about current utility practices. OPC provided its perspective, and requested that utilities consider automatic extensions and restorations of service for 30 days, to allow clients to seek assistance for their pending service terminations and service shut-offs.

While there was disagreement over the issue of service extensions and restorations, the utilities in attendance did offer to coordinate with OPC to arrive at a reasonable solution, and the Senators requested that the Companies cooperate with OPC to try to reach some common ground.

BGE Critical Needs Pilot Program

Subsequent to that meeting, OPC, in partnership with the Cancer Support Foundation (CSF), has focused its attention on the development of a pilot program in the BGE service territory. The purpose is to develop and test protocols for (1) the identification of medically vulnerable customers in danger of losing utility service, or who have lost service, (2) the maintenance or restoration of service to customers with critical medical needs, and (3) an efficient process for applying for and obtaining funds to ensure maintenance of service.

OPC and CSF have worked with BGE and other public and private agencies to develop a process to assist with these objectives. Over the past several months, we have worked together to establish a pilot program with navigators from medical services (primarily cancer centers) and hospitals, as well as OHEP and local energy assistance agency programs.

Energy assistance funding is provided through a number of resources: OHEP's EUSP and MEAP, Department of Social Services (DSS) emergency programs and Office on Aging programs. The assistance is offered through teams of agency management personnel, who expedite funding for the critical needs clients with serious medical problems. As of this date, navigators from medical services and hospitals include, but are not limited to, the following:

¹ BGE, Pepco, Delmarva Power, Potomac Edison Company and SMECO attended the meeting.

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**MD Oncology
Union MedStar
Montgomery Medstar
Mercy
St Joes
Anne Arundel Medical
Johns Hopkins Bayview
St Agnes
University of Md
GBMC
Meal on Wheels
Franklin Square
Franklin Square Breast Center
Northwest
Image Center
DHMH State Cancer Control Center
Upper Chesapeake
Bel Air
Johns Hopkins
BWMC
Union Hospital of Cecil County
University of Maryland's Evelyn Jordan Center
Sinai**

Baltimore County, Baltimore City, Harford County , Carroll County, Howard, Anne Arundel and Montgomery County have management teams in place at their OHEP, DSS and Aging Offices to coordinate resources as well as appropriate application assistance.

On-Service Customers. BGE has been willing to provide 30 day extensions for on-service customers who simply notify the Company that they have a critical medical need. BGE then withdraws customers' accounts from termination status, sends customers a PSC Medical Certification Form and issues a new termination notice after the initial 30 day extension if customers' accounts are not addressed with a full payment or payment plan. This BGE protocol exceeds current COMAR regulations, which only require that certification forms be provided *before* an extension is issued. As a practical matter, the Pilot extension assistance results in

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customers receiving approximately an additional 60 days before actual service termination². This voluntary process has been of assistance to a number of customers.

Off-service customers. BGE has also been willing to respond, through a navigator processing system, within twenty four (24) hours, to assist with immediate restoration of critically ill customers identified through the Pilot program. The service restorations, however, require presentation of a reasonable financial assistance plan, as well as a statement identifying the customer as being critically ill. The restoral assistance is helpful, in that the Company does not require verification of the funding before restoration. However, the availability of this option is constrained at present by the availability of agencies with the expertise and staffing to engage in emergency case management in a 24 hour period. Currently, OPC has been filling that niche, since OPC has a successful track record in providing comprehensive assistance to customers, especially those with critical needs. However, the process requires OPC to be largely available to navigators for guidance in their presentation of cases to the Company. That level of OPC involvement is not sustainable for a full BGE program or an expansion to other utility service territories.

Goals

OPC would like to continue to work with BGE and other utilities to do the following:

- Expand the pilot program to other service territories
- Expand the availability of the process to all customers who meet the medical certification requirements
- Expand training and participation to a wider circle of navigators and agency participants
- Extend the service restoration option to permit immediate restoral of service for customers with critical needs with a commitment to pursue funding assistance.

² The 55 day rule would also apply in the event the customer applies for EUSP/MEAP assistance.

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Outstanding concerns

- Winter restrictions - Affidavit requirements to ensure that service termination does not constitute a threat to the life or health of the occupants (COMAR 20.31.03.03)
- Smart meter service disconnections – field visits
- Reasonable payment arrangements

COMMONWEALTH OF KENTUCKY
BEFORE THE PUBLIC SERVICE COMMISSION

In the Matter of:

ELECTRONIC APPLICATION OF KENTUCKY-)	
AMERICAN WATER COMPANY FOR AN)	CASE NO.
ORDER APPROVING THE ESTABLISHMENT)	2020-00257
OF A REGULATORY ASSET)	

ORDER

On July 29, 2020, Kentucky-American Water Company (Kentucky-American) filed an application, pursuant to KRS 278.220, seeking approval to establish a regulatory asset for certain expenses related to the COVID-19 emergency. On October 28, 2020, Kentucky-American supplemented its application with the monetary amounts for which it sought a regulatory asset, with expenses totaling \$1,055,890 as of September 30, 2020. Kentucky-American filed an additional supplement on December 4, 2020, with an updated total of \$1,196,603 through October 30, 2020.

The Attorney General of the Commonwealth of Kentucky, by and through the Office of Rate Intervention (Attorney General) is the only intervenor in this proceeding. Pursuant to a procedural schedule, Kentucky-American responded to one round of data requests. On December 4, 2020, the Commission granted Kentucky-American and the Attorney General's joint request to file briefs and submit this matter for a decision based on the written record. On December 9, 2020, the parties filed their respective briefs. This matter now stands submitted for a decision.

LEGAL STANDARD

A utility must obtain Commission approval for accounting adjustments before establishing any expense as a new regulatory asset. A regulatory asset is created when a utility is authorized to capitalize an expenditure that would be recorded as a current expense under traditional accounting rules. A utility may request recovery of the capitalized amount in future rates, but recovery is subject to Commission review and approval. The authority to establish regulatory assets arises out of the Commission's plenary authority to regulate utilities under KRS 278.040 and its authority to establish a system of accounts for utilities under KRS 278.220.

The Financial Accounting Standards Board's Statement of Financial Accounting Standards No. 71, Accounting for the Effects of Certain Types of Regulation, which was codified as Accounting Standards Codification (ASC) 980, Regulated Operations, provides the criteria for recognition of a regulatory asset.¹ Supplemental to generally accepted accounting principles (GAAP), long-standing Commission precedent provides

¹ ASC 980-340-25-1 provides, in full, as follows:

25-1 Rate actions of a regulator can provide reasonable assurance of the existence of an asset. An entity shall capitalize all or part of an incurred cost that would otherwise be charged to expense if both of the following criteria are met:

- a. It is probable (as defined in Topic 450) that future revenue in an amount at least equal to the capitalized cost will result from inclusion of that cost in allowable costs for rate-making purposes.
- b. Based on available evidence, the future revenue will be provided to permit recovery of the previously incurred cost rather than to provide for expected levels of similar future costs. If the revenue will be provided through an automatic rate-adjustment clause, this criterion requires that the regulator's intent clearly be to permit recovery of the previously incurred cost.

A cost that does not meet these asset recognition criteria at the date the cost is incurred shall be recognized as a regulatory asset when it does meet those criteria at a later date.