

services to participate. It is most common for a program to require a customer to enroll in a utility low-income energy efficiency program.

- *Targeting:* About 25 percent of participants have income at or below 50 percent of the poverty level, 50 percent have income between 51 and 100 percent of the poverty level, and 25 percent have income between 101 and 150 percent of the poverty level.
- *Bill Subsidy Determination:* The programs utilize a variety of methods to determine the bill subsidy. These include a percent discount, rate discount, percentage of income program, fixed credit program, monthly subsidy, and annual subsidy. Percentage of income is the most common subsidy type, with 16 out of 27 programs using this subsidy type.
- *Bill Subsidy Benefit Levels:* The mean subsidy amount ranges from \$40 to \$1,206 with an average of \$600 across the programs. Several programs provide different subsidy amounts based on the household's heating type.
- *Minimum Monthly Payment & Maximum Credit:* Programs may require a minimum monthly payment amount or a maximum credit to control program costs. These restrictions can depend on fuel type, household size, income, or poverty level. The mean minimum monthly bill is \$23, and the mean annual maximum credit is \$1,345.
- *Bill Consistency:* Customers tend to prefer fixed monthly bills and report that predictable bills are easier to pay. Fifteen programs offer fixed bills through a percentage of income payment plan and three offer fixed bills through budget billing.
- *Arrearage Forgiveness Parameters:* Most programs offer arrearage forgiveness over 12 to 36 months. This arrearage forgiveness is received every month that the customer pays their bill in full, however most programs provide forgiveness for previous months when customers make up missed payments. A few programs require a co-pay of five dollars per month toward the accumulated arrearages.
- *LIHEAP Coordination:* Eleven of the assistance programs offer referrals to LIHEAP. These referrals were commonly made by utility representatives or staff at local agencies. One common requirement for participating in the bill payment assistance programs is applying for LIHEAP. Twelve utilities reported that this was a requirement for their bill payment assistance program.
- *Program Removal:* Non-payment, failure to recertify, and failure to seek other services such as LIHEAP or weatherization were common removal reasons. Other removal reasons included being income ineligible for the program, moving, failing to provide income or

household documentation, establishing multiple accounts, failing to allow access to meter reads, and successfully completing the program.

- *Holistic Service Delivery and Case Management:* Referrals to weatherization services was the most common type, made by 15 programs, followed by referrals to hardship services, made by ten programs, and referrals to special needs assistance by nine programs.
- *Other Challenges:* In response to the Coronavirus, about half of the states implemented a shutoff moratorium. Additional moratoriums were implemented at the utility level. Many utilities also introduced additional assistance programs during the emergency.

Outcomes

This section reviews the outcomes that were assessed to determine the success of bill payment assistance programs based on available program evaluation reports. Key findings are summarized below.

- *Participation:* The number of participants varied widely, ranging from 2,515 to 359,655 with an average of 70,986.
- *Participant Characteristics:* Across all programs, 18 percent of households had someone aged 65 years or older, 44 percent had a child aged 18 years or younger, 30 percent were employed, two percent received unemployment income, and 22 percent received disability income. Programs that conducted outreach at community events had a higher share of participants with a child in the household. Programs that conducted outreach through United Way, company representatives, and bill inserts had a higher share of participants with an elderly household member.
- *Retention:* The percent of participants who remained in the program for a full year ranged from 46 to 86 percent with a mean of 65 percent. The percent of participants who re-certified to continue their enrollment in the program ranged from 43 to 72 percent with an average of 57 percent. The mean number of years participants remained in the program ranged from 2.0 to 4.6 years with a mean of 3.2 years.
- *Affordability:* The bill declined from the pre-period to the post-period for all 13 programs with information. The energy burden declined for all ten programs with information. The discount received by the customers ranged from \$191 to \$1,054 with an average of \$467. The net change for customers' energy burden ranged from a decline of nine percentage points to a decline of two percentage points, with an average decline of six percentage points.

Customers below 50 percent of the FPL were more likely to have a greater energy burden than those in the other poverty level groups. Therefore, programs that do a better job of targeting this group can have a greater impact on energy burden. While those with income at or below 50 percent of the FPL had an average reduction of 12 percentage points, those

between 51 and 100 percent had an average reduction of five percentage points, and those between 101 and 150 percent had an average reduction of two percentage points.

- *Bill Payment:* The total charges increased for one program and decreased for 12 programs. The total payments and credits increased for nine programs and decreased for four programs. The net change for customers' total charges ranges from a decline of \$272 to an increase of \$29, with an average decline of \$98. The net change for customers' payments and credits ranged from a decline of \$115 to an increase of \$538, with an average increase of \$166.
- *Arrearages:* Participants' shortfall decreased for all 13 programs with information. Participants' ending balance increased for one program and decreased for eight programs. A decrease in the ending balance was characteristic of programs that provided high levels of discounts and included an arrearage forgiveness component. The amount of arrearage forgiveness ranged from \$26 to \$720, with a mean of \$230.
- *Collections Actions:* The number of collections actions increased for two programs and decreased for six programs. The cost of collections actions increased for one program and decreased for six programs. The average net change in collections cost was a decline of \$38.
- *Other Benefits:* The percent of customers who received LIHEAP increased from 42 percent to 51 percent following program enrollment, with a net change of four percent. Programs that required customers to enroll in LIHEAP were more likely to have a positive and significant net change in the percentage of customers who received LIHEAP in the post period.
- *Other Affordability Issues:* All bill payment assistance programs were effective at helping customers with non-energy related issues according to survey responses. These non-energy related issues included helping households with food and medical expenses. Programs that used a percent of income or a percent discount bill subsidy with budget billing were more likely to help customers meet other financial obligations.
- *Satisfaction:* Eighty-five percent of participants across all programs said that the program was very important in helping them make ends meet and eighty-six percent of participants across all programs were very satisfied with the programs. Program satisfaction was loosely related to the change in energy burden.

Best Practices

This section provides a discussion of program design advantages, disadvantages, and best practices for low-income energy bill payment assistance programs across the country. Key findings are summarized below.

- *Outreach:* Programs are most effective at reaching the eligible population when they employ a variety of outreach techniques that reach customers with various characteristics and when they partner with trusted community organizations.
- *Intake:* As with outreach, intake methods should differ based on participants' characteristics and programs that offer several options will be the most successful.
- *Income Eligibility:* Most programs reviewed use 150 percent of the Federal Poverty Level (FPL) as an eligibility guideline. Some programs use a percent of the state median income or base eligibility on LIHEAP. Income eligibility should be determined to ensure that customers in need are served at a level of benefits that impacts their energy affordability.
- *Other Eligibility Requirements:* The program should consider requirements that incentivize customers to participate in other assistance programs and increase the probability of success but avoid requirements that can pose barriers to participation.
- *Enrollment Level:* Programs should balance enrollment and benefit levels to ensure that they significantly impact participants and do not adversely impact the ratepayer due to a large bill adder.
- *Bill Subsidy Determination:* Percent of income programs provide more equitable benefits based on energy burden, result in fixed monthly payments, serve lower-income households, and have greater impacts on energy burden.
- *Energy Burden Target:* Furnishing a benefit level to achieve a set energy burden target provides the greatest assurance that customers will receive benefits in proportion to their need for assistance.
- *Bill Consistency:* Customers have expressed a preference for predictable monthly energy bills that do not fluctuate over the course of the year, and such equalized billing provides greater opportunity for bill management.
- *Arrearage Forgiveness:* Arrearage forgiveness allows participants to remove debt built up prior to program participation and meet current bill payment obligations. Customers who were unable to afford their bills prior to program participation are unlikely to afford the discounted bill if they also have responsibility for paying off large, accumulated arrearages.

Educating customers about the arrearage forgiveness benefit can help incentivize customers to pay their bills. Providing arrearage forgiveness when customers make up their missed payments enables customers to receive the benefit even if they cannot stay current and provides an additional opportunity for customers to become current on their utility bills.

- *LIHEAP Coordination:* Coordination with LIHEAP can increase benefit receipt and provide additional potential for customers to succeed on the bill payment assistance program.
- *Energy Efficiency Services:* Energy efficiency services should be targeted to high-usage payment program participants. Additional funding can be provided to remediate conditions that prevent measure installation and additional efforts can be made to provide outreach to landlords to obtain agreement for service delivery.
- *Program Removal:* Allowing customers to remain on the bill payment assistance program until service termination for nonpayment will provide another opportunity for customers to make up their bills at the lower payment rate and remain in the program.
- *Recertification:* Recertification ensures that customers remain eligible for the program, but the process should not be too burdensome.
- *Other Challenges:* Shutoff moratoriums can provide customers with time to make their payments but can lead to reduced need for assistance that has been made available during a crisis such as COVID-19 or extreme weather. Requiring customers to apply for available assistance can help to ensure that available assistance is leveraged.

Recommendations

Key recommendations for various program design parameters are summarized below.

1. *Administration:* Ameren should continue to administer Keeping Current with assistance from the agencies on outreach, intake, and data management.
2. *Outreach:* Ameren should conduct additional outreach for Keeping Current through agencies and their own call center representatives.
3. *Intake:* Agencies should continue to encourage customers to visit offices for in-person Keeping Current intake but should also provide flexibility to customers who are unable to visit the office.
4. *Income Eligibility:* Ameren should maintain the current income eligibility level of 150 percent of the FPL. They should base eligibility on one month of income to ensure that customers who recently became unemployed due to COVID-19 are eligible.

5. *Other Eligibility Requirements:* Ameren should continue the following additional eligibility requirements.
 - Weatherization: Apply for the program.
 - LIHEAP: Apply for the program (continued) and apply benefits to Ameren bill if an Ameren gas or Ameren electric heating customer (new).
 - Consistent Bill: Enroll in budget billing (in the absence of a new Percentage of Income Program that provides a fixed monthly bill).
6. *Additional Populations:* Ameren should consider enhanced benefits for formerly homeless customers to help them pay off past balances and open a new Ameren account.
7. *Recertification:* Ameren should continue to require participants to re-certify their eligibility every two years. This will be especially important if they move to a Percentage of Income Payment Program (PIPP).
8. *Enrollment Level:* Ameren and their agencies should provide additional outreach as discussed above to reach more customers with this program.
9. *Bill Subsidy Determination:* Ameren should consider moving to a PIPP to provide participants with a fixed energy burden at an affordable level.
10. *Target Energy Burden:* Ameren should consider targeting a three percent energy burden for alternative electric heat participants and a six percent energy burden for electric heat participants. If the cost of these energy burden targets is beyond a target program budget, Ameren should consider a somewhat higher energy burden to reduce costs.
11. *Minimum Payments and Maximum Credits:* Ameren should consider a minimum monthly payment and a maximum annual credit to limit program costs. Customers who reach the maximum annual credit should be targeted for weatherization.
12. *Arrearage Forgiveness:* Ameren should continue the arrearage forgiveness program. We recommend that forgiveness be provided for bills that are made up following the initial bill due date. Participants should receive education so that they understand that this is an important benefit of the program.
13. *LIHEAP:* Ameren and the agencies should provide additional education and outreach to ensure that participants apply for LIHEAP assistance. They should send reminders to participants to re-apply to LIHEAP and emphasize that they can receive benefits from both LIHEAP and Keeping Current at the same time.
14. *Energy Efficiency:* Ameren should prioritize high usage Keeping Current participants for weatherization. They should educate landlords about the program and encourage landlords to provide authorization for program measures.

15. *Program Removal*: Participants are currently removed from Keeping Current if they are not current within two billing cycles. We recommend that customers remain on Keeping Current as long as they remain customers and are not terminated due to nonpayment. We also recommend that customers receive monthly bill credits for all made up past due monthly bills.

Projected PIPP Costs

We recommended that Ameren consider a Percentage of Income Program (PIPP) to better target those most in need, provide more equitable energy burdens across program participants, and reach the goal of affordable energy. Therefore, it is important to understand the potential costs of a PIPP. This section provides projections of average participant credits by poverty level and total subsidy costs for various levels of program participation. These are only the costs for the bill subsidy, so there would be additional costs for arrearage forgiveness and program administration.

Program Credits

Modelled PIPP credits are significantly greater than the Ameren Keeping Current Program credits.

- Keeping Current annual credits averaged \$575 for electric heat participants at or below 50 percent of the Federal Poverty Level (FPL) and \$199 for Alternative Heat participants at or below 50 percent of the FPL.
- The six percent burden target for Electric Heat participants at or below 50 percent of the FPL provided a mean annual credit of \$1,843 with no minimum payment or maximum credit and a mean credit of \$1,484 with the minimum payment and maximum credit.
- The ten percent burden target for Electric Heat participants at or below 50 percent of the FPL provided a mean credit of \$1,622 with no minimum payment or maximum credit and a mean credit of \$1,332 with the minimum payment and maximum credit.
- Differences in annual credits between the current program structure and the PIPP are smaller for the higher poverty level groups, and the credits for Electric Heat participants between 101 and 150 percent of the FPL are greater under Ameren's current program than under the higher burden PIPP structure.

Bill Credit Costs

- With the current level of program participation (as of July 2020), total credit costs under the Keeping Current structure are projected to be \$681,953 compared to costs of \$2.1 million for the six and three percent PIPP burden targets with no minimum payment or maximum credit and \$1.8 million with a minimum payment and maximum credit.
- With a ten percent participation level, total credit costs under the current structure are projected to be \$2.4 million compared to costs of \$22.2 million for the six and three percent PIPP burden targets with no minimum payment or maximum credit and \$19.7 million with a minimum payment and maximum credit.

I. Introduction

Ameren Missouri introduced the Keeping Current Program in October 2010. The energy assistance program has two components – The Keeping Current year-round program and the Keeping Cooling summer assistance program. The Keeping Current Program provides monthly bill credits and arrearage reduction for customers who continue to make monthly bill payments. The Keeping Cooling Program provides bill credits in the summer months, primarily June, July, and August to offset the costs of air conditioning usage.

A. *Keeping Current Program*

The objectives of the Keeping Current program are as follows.

- Improve affordability of utility payments for very low-income customers.
- Promote a level of usage that ensures health and safety.
- Minimize program costs and maximize efficiencies by working with agencies that serve low-income households.
- Minimize program costs and maximize efficiency by linking program participation to application for Weatherization and LIHEAP.

APPRISE has conducted four process and impact evaluations of the Keeping Current and Keeping Cooling programs. These evaluations assessed program design, implementation, participation, retention, and impacts; and made recommendations for program improvements. The evaluations found that the program has been successful in enrolling low-income households, improving energy affordability, improving participants' bill payment regularity and coverage rates, and reducing collections actions. The evaluations made recommendations for program refinements that Ameren implemented and that resulted in improved outcomes for the participants.

B. *Research Activities*

The stakeholder group has requested that Ameren conduct a program design review to assess alternative bill payment designs and make recommendations for refinement or redesign of Ameren's program. The following research activities were conducted.

- Needs Assessment – We analyzed the number and characteristics of customers potentially eligible for Keeping Current within Ameren's service territory under various assumptions about eligibility criteria.
- Goal Setting – We assessed potential goals for bill payment assistance programs. There are many different goals that can conflict with one another, so the program should acknowledge how these goals are incorporated and prioritized.
- Parameter Selection – We reviewed program parameters that can impact the success of Keeping Current, and which parameters have been selected in other low-income bill payment assistance programs that are offered around the country.

- Outcomes – We analyzed the outcomes of other bill payment assistance programs that have been evaluated.
- Best Practices – We assessed the best practices for low-income energy bill payment assistance programs based on the other research in this study.
- Recommendations – We offer guidance for Ameren’s Keeping Current Program based upon a synthesis of this study’s findings, stakeholder feedback, and the current and expected economic impact of the Coronavirus.

C. Organization of the Report

Six sections follow this introduction.

- Section II – Needs Assessment: This section presents the findings of the needs assessment.
- Section III – Goal Setting: This section assesses the various goals of the bill payment assistance programs.
- Section IV – Parameter Selection: This section reviews program parameters from bill payment assistance programs across the country.
- Section V – Outcomes: This section reviews outcomes that were assessed to determine the success of bill payment assistance programs based on available program evaluation reports.
- Section VI – Best Practices: This section provides a discussion of best practices for low-income energy bill payment assistance programs across the country.
- Section VII – Recommendations: This section presents key recommendations for Ameren Missouri’s Keeping Current Program based on all of the research conducted in this study and the findings from previous Ameren Keeping Current evaluations. The section also provides projected costs for a Percentage of Income Payment Program under various assumptions about targeted energy burden and program participation levels.

APPRISE prepared this report under contract to Ameren Missouri. Ameren facilitated this research by furnishing data and information to APPRISE. Any errors or omissions in this report are the responsibility of APPRISE. Further, the statements, findings, conclusions, and recommendations are solely those of analysts from APPRISE and do not necessarily reflect the views of Ameren.

II. Needs Assessment

This section provides a profile of low-income households in Ameren Missouri's electric service territory using data from the 2016-2018 American Community Survey (ACS). These data were used to estimate the number of households, poverty level distribution, demographic characteristics, and energy burden. These data represent Ameren's electric service territory in 2018.

A. Introduction and Methodology

The ACS data are organized into Public Use Microdata Areas (PUMAs), which may comprise part of a county, a whole county, or parts of several counties. Several of the PUMAs in Missouri are comprised of a mixture of counties that are and are not included in Ameren's service territory. We used a detailed map of Ameren's electric service territory to determine which PUMAs to include in the analysis. Group Quarters, vacant units, and non-head of household records were not included in the analysis.

Tables II-1A and II-1B display the counties in Ameren Missouri's electric service territory. Counties were combined in the tables when they were included together in one ACS PUMA and could not be separately analyzed. For each group of counties, the tables show the ACS estimate of the number of households, an indicator of whether or not the counties were included in the analysis, and a brief explanation of why that determination was made. In general, counties or PUMAs were included in the analysis if at least half of their total area was contained within Ameren's service territory.

**Table II-1A
Ameren Missouri Electric Service Territory Analysis
PUMAs Included in Analysis**

Counties in PUMA		ACS Household Estimate	Included in Analysis	Reason for Inclusion
Served by Ameren	Not Served			
Adair, Clark, Knox, Lewis, Marion, Monroe, Ralls, Schuyler, Scotland	Macon Shelby	47,690	Yes	Ameren covers about half the area. PUMA represents northeastern part of Ameren's territory.
Lincoln, Warren, Audrain, Pike, Montgomery		52,220	Yes	Ameren covers the entirety of these counties.
Cole, Callaway, Moniteau, Osage		55,717	Yes	Ameren covers the entirety of these counties.
Boone		70,473	Yes	Ameren covers the entire county.
Franklin		40,222	Yes	Ameren covers most of the county.
St. Charles		146,144	Yes	Ameren covers the entire county.
St. Louis County		406,079	Yes	Ameren covers the entire county.
City of St. Louis		140,602	Yes	Ameren covers the entire independent city.
Jefferson		84,649	Yes	Ameren covers the entire county.
St. Francois, Washington, Ste. Genevieve	Perry	47,366	Yes	At least half in Ameren. Washington, St. Francois served, all Perry and most Ste. Genevieve not.
Dunklin, Stoddard, New Madrid, Pemiscot, & Mississippi		42,302	Yes	Ameren covers the entirety of all counties.
Included Household Estimate		1,133,464		

Table II-1B
Ameren Missouri Electric Service Territory Analysis
PUMAs Not Included in Analysis

Counties in PUMA		ACS Household Estimate	Included in Analysis	Reason for Exclusion
Served by Ameren	Not Served by Ameren			
Daviess, Gentry, Livingston, Linn, & Sullivan	Atchison, Grundy, Harrison, Holt, Mercer, Nodaway, Putnam, & Worth	42,606	No	Daviess, Gentry, Livingston, Linn, and Sullivan counties are all only partially within Ameren territory. The other counties are not served by Ameren.
Dekalb	Buchanan & Andrew	44,214	No	Dekalb County is only partially in Ameren territory. Buchanan and Andrew counties are not served by Ameren.
Pettis, Randolph, Saline, Cooper, Howard, Carroll, & Chariton		47,762	No	Ameren serves most of Cooper, Howard, and Randolph, but only a very small portions of the remaining counties, and none of Saline County.
Ray, Clinton, & Caldwell	Johnson & Lafayette	52,826	No	All of Lafayette and Johnson counties, and most of Ray county, are not in Ameren territory.
Clay		86,678	No	Only a small portion of the county is in Ameren territory.
Camden, Miller, & Morgan	Pulaski	47,336	No	Ameren serves most of Morgan and Miller counties, but only serves a small portion of Camden and does not serve Pulaski at all.
Crawford, Gasconade, & Maries	Dent & Phelps	43,384	No	All of Gasconade is in Ameren service territory, but most of Crawford and Marie counties are not. Dent and Phelps counties only receive gas service from Ameren.
Cape Girardeau, Scott, & Bollinger		48,822	No	All of Scott and half of Gape Girardeau are in Ameren territory, but Bollinger is not.
Madison, Iron, & Reynolds	Carter, Butler, Ripley, & Wayne	39,785	No	Ameren serves all of Butler County, half of Wayne County, and a small portion of Reynolds County. Carter and Ripley counties are not in Ameren territory.
Excluded Household Estimate			453,413	

B. Ameren's Electric Service Territory Analysis

This section provides information on the number of households, poverty level, demographic characteristics, and energy burden for all households within Ameren's electric service territory.

Table II-2A displays the number of households in the analyzed area with direct electric service as well as the number of households without direct electric service, either because their utilities were included in their rent or because they did not use electricity. The table shows that 96 percent of the households had direct electric service, three percent had their utilities included in their rent, and one percent did not use electricity. All subsequent tables only include households with direct electric service.

**Table II-2A
Ameren Electric Service Territory
Electric Service Status**

Service Status	Number of Households	Percent of Households
Direct Electric Service	1,093,350	96%
Electric Charge Included in Rent	29,333	3%
No Electric Charges	10,782	1%
Total	1,133,465	100%

Table II-2B breaks down the number of households with direct electric service into those who heat their home with electricity and those who heat their home with another fuel. The majority of these households, 67 percent, do not heat with electricity.

**Table II-2B
Ameren Electric Service Territory
Electric Service Type**

Service Type	Number of Households	Percent of Households
Electric Heating	365,982	33%
Non-Electric Heating	727,368	67%
Total	1,093,350	100%

Table II-3 displays the number and percent of households with income at or below each of the indicated poverty levels by service type. The table shows the following.

- 10 percent had income at or below the poverty level.
- 17 percent had income at or below 150 percent of the poverty level.
- 25 percent had income at or below 200 percent of the poverty level.
- 34 percent had income at or below 250 percent of the poverty level.
- 42 percent had income at or below 300 percent of the poverty level.

Households with electric heat had lower poverty levels.

Table II-3
Ameren Electric Service Territory
Households Below Indicated Poverty Levels

Poverty Level	Service Type					
	Electric Heating		Non-Electric Heating		Total	
	#	%	#	%	#	%
All Households	365,982	100%	727,368	100%	1,093,350	100%
100% FPL	45,639	12%	60,893	8%	106,532	10%
150% FPL	78,375	21%	110,547	15%	188,922	17%
200% FPL	113,599	31%	164,976	23%	278,575	25%
250% FPL	144,870	40%	223,548	31%	368,418	34%
300% FPL	178,978	49%	281,967	39%	460,945	42%

Table II-4 displays the poverty level distribution by service type only for households at or below 300 percent of the poverty level. The table shows that 23 percent had income at or below the poverty level.

Table II-4
Ameren Electric Service Territory
Poverty Level Distribution at or Below 300% of Poverty

Poverty Group	Service Type					
	Electric Heating		Non-Electric Heating		Total	
	#	%	#	%	#	%
0% - 100%	45,639	26%	60,893	22%	106,532	23%
101% - 150%	32,736	18%	49,654	18%	82,390	18%
151% - 200%	35,224	20%	54,430	19%	89,653	19%
201% - 250%	31,271	17%	58,571	21%	89,842	19%
251% - 300%	34,108	19%	58,420	21%	92,527	20%
Total	178,978	100%	281,967	100%	460,945	100%

Table II-5 displays the number and percent of households at or below each of the indicated poverty levels that included a child under 18, an individual older than 62, or a disabled member. Among households at or below 100 percent of the poverty level, 36 percent included a child under 18, 25 percent included an elderly member, and 38 percent included a disabled member.

Table II-5
Ameren Electric Service Territory
Vulnerable Households Below Indicated Poverty Levels

Poverty Level	Households	Vulnerable Households					
		Child Under 18		Elderly		Disabled	
		#	%	#	%	#	%
100% FPL	106,532	38,198	36%	26,761	25%	41,003	38%
150% FPL	188,922	67,263	36%	59,383	31%	74,296	39%
200% FPL	278,575	96,848	35%	93,576	34%	105,292	38%
250% FPL	368,418	126,056	34%	129,446	35%	132,753	36%
300% FPL	460,945	154,410	34%	161,860	35%	158,217	34%

Table II-6 displays the language spoken by households with income at or below each of the indicated poverty levels. The table shows that at all the poverty levels listed, 92 percent of households spoke English, three percent spoke Spanish, two percent spoke a different Indo-European language, and three percent spoke some other language.

Table II-6
Ameren Electric Service Territory
Language Spoken Below Indicated Poverty Levels

Poverty Level	Households	Language							
		English		Spanish		Indo-European		Other	
		#	%	#	%	#	%	#	%
100% FPL	106,532	97,821	92%	2,806	3%	2,250	2%	3,654	3%
150% FPL	188,922	174,024	92%	5,114	3%	3,848	2%	5,937	3%
200% FPL	278,575	256,117	92%	7,656	3%	6,837	2%	7,965	3%
250% FPL	368,418	340,018	92%	10,162	3%	8,694	2%	9,544	3%
300% FPL	460,945	425,803	92%	12,357	3%	11,198	2%	11,587	3%

Table II-7 displays the mean annual energy bill and mean annual electric energy burden for households with income at or below each of the indicated poverty levels by service type. The mean burden ranged from six percent for households at or below 300 percent of poverty to 19 percent for households at or below 100 percent of poverty. The mean electric energy burden was higher for electric heating households than non-electric heat households at all indicated poverty levels.

Table II-7
Ameren Electric Service Territory
Mean Annual Energy Bills and Burden Below Indicated Poverty Levels

Poverty Level	Service Type								
	Electric Heating			Non-Electric Heating			Total		
	#	Energy Exp.	Energy Burden	#	Energy Exp.	Energy Burden	#	Energy Exp.	Energy Burden
100% FPL	45,639	\$1,919	21%	60,893	\$1,629	17%	106,532	\$1,753	19%
150% FPL	78,375	\$1,914	13%	110,547	\$1,615	10%	188,922	\$1,739	11%
200% FPL	113,599	\$1,944	10%	164,976	\$1,601	8%	278,575	\$1,741	9%
250% FPL	144,870	\$1,953	8%	223,548	\$1,588	6%	368,418	\$1,732	7%
300% FPL	178,978	\$1,960	7%	281,967	\$1,583	5%	460,945	\$1,729	6%

Table II-8 provides a breakdown of the mean annual energy bill and mean annual electric energy burden by poverty level and service type for households at or below 300 percent of the poverty level. The mean electric bill among all households with electric service below 300 percent of the poverty level was \$1,729 and the mean electric burden was roughly six percent. Electric heating households had a mean electric bill of \$1,960 and a mean electric burden of seven percent, while non-electric heating households had a mean bill of \$1,583 and a mean burden of five percent. While electric heating households below the poverty level had a mean electric burden of 21 percent, those between 101 and 150 percent of the poverty level had a mean burden of nine percent. This shows the importance of targeting assistance to those in the lowest poverty level group.

Table II-8
Ameren Electric Service Territory
Mean Annual Energy Bills and Burden by Poverty Level

Poverty Group	Service Type								
	Electric Heating			Non-Electric Heating			Total		
	#	Energy Exp.	Energy Burden	#	Energy Exp.	Energy Burden	#	Energy Exp.	Energy Burden
All Households Below 300%	178,978	\$1,960	7%	281,967	\$1,583	5%	460,945	\$1,729	6%
0% - 100%	45,639	\$1,919	21%	60,893	\$1,629	17%	106,532	\$1,753	19%
101% - 150%	32,736	\$1,908	9%	49,654	\$1,597	7%	82,390	\$1,721	8%
151% - 200%	35,244	\$2,011	7%	54,430	\$1,574	5%	89,653	\$1,746	6%
201% - 250%	31,271	\$1,985	5%	58,571	\$1,552	4%	89,842	\$1,703	4%
251% - 300%	34,108	\$1,990	4%	58,420	\$1,561	3%	92,527	\$1,719	4%

C. Public Use Microdata Area / County Group Level Analysis

This section provides information on the number of eligible households, poverty level, demographic characteristics, and energy burden by PUMA for all households within the defined analysis territory. This provides information on how household characteristics vary across Ameren Missouri's service territory.

Figure II-1 and Table II-9 display the counties that were included in each PUMA Group in the analysis territory. While many counties were within a single PUMA, other counties included multiple PUMAs. Thus, while most of the PUMA Groups contained only a single PUMA, Group 6 included the three PUMAs that make up St. Charles County, Group 7 included the eight PUMAs that make up St. Louis County, Group 8 included the two PUMAs that make up the City of St. Louis, and Group 9 included the two PUMAs that make up Jefferson County.

Figure II-1
PUMA Groups in Ameren's Service Territory

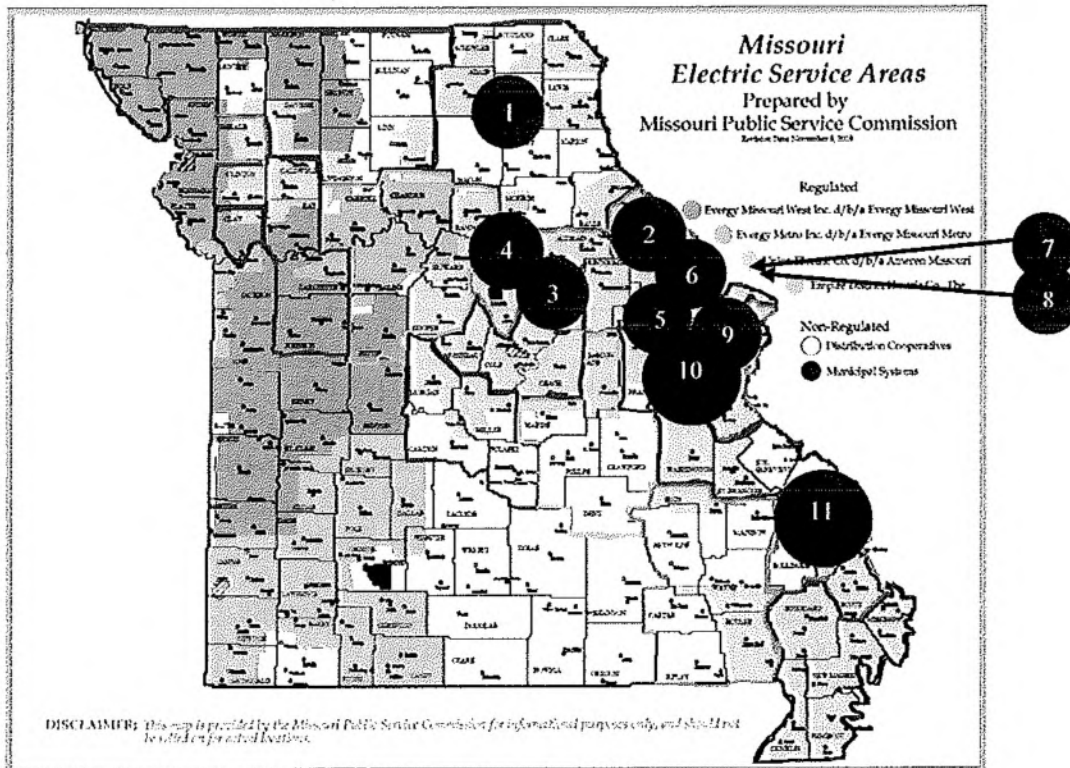


Table II-9
PUMA Groups in Ameren's Service Territory

PUMA Group	Counties	Number of PUMAs
PUMA 1	Adair, Clark, Knox, Lewis, Macon, Marion, Monroe, Ralls, Schuyler, Scotland, & Shelby	1
PUMA 2	Lincoln, Warren, Audrain, Pike, & Montgomery	1
PUMA 3	Cole, Callaway, Moniteau, & Osage	1
PUMA 4	Boone	1
PUMA 5	Franklin	1
PUMA 6	St. Charles	3
PUMA 7	St. Louis (County)	8
PUMA 8	St. Louis (City)	2
PUMA 9	Jefferson	2
PUMA 10	St. Francois, Washington, Perry, & Ste. Genevieve	1
PUMA 11	Dunklin, Stoddard, New Madrid, Pemiscot, & Mississippi	1

Table II-10 displays the heating type for households with income at or below 300 percent of the poverty level. There were more households with non-electric heat than households with electric heating in the St. Louis area, northeast Missouri, and St. Charles. A few regions in central Missouri had more households with electric heat than households with another heating source.

Table II-10
Service Type by PUMA
Households at or Below 300% of Federal Poverty Level

Service Type	Electric Service Households in Analyzed Territory					
	PUMA 1	PUMA 2	PUMA 3	PUMA 4	PUMA 5	PUMA 6
	Northeast Missouri	Lincoln, Warren, Audrain, Pike, Montgomery	Cole, Callaway, Moniteau, & Osage	Boone	Franklin	St. Charles
# Households ≤ 300%	25,063	25,139	23,281	30,031	17,603	39,225
Electric Heat	34%	61%	53%	46%	72%	35%
Non-Electric Heat	66%	39%	47%	54%	28%	65%
Total	100%	100%	100%	100%	100%	100%

Service Type	Electric Service Households in Analyzed Territory				
	PUMA 7	PUMA 8	PUMA 9	PUMA 10	PUMA 11
	St. Louis (County)	St. Louis (City)	Jefferson	St. Francois, Washington, Perry, Ste. Genevieve	Dunklin, Stoddard, New Madrid, Pemiscot, Mississippi
# Households ≤ 300%	143,804	68,574	34,889	25,081	28,255
Electric Heat	23%	32%	61%	60%	38%
Non-Electric Heat	77%	68%	39%	40%	62%
Total	100%	100%	100%	100%	100%

Table II-11 displays the percent of households with income at or below the indicated poverty levels in each PUMA Group. The table shows that eligibility varied significantly across PUMA Groups. St. Charles County had a lower percentage of low poverty level households and Group 11 in the southeast had a higher percentage of low poverty level households. For example, while only eight percent of households in St. Charles County had income at or below 150 percent of the FPL, 36 percent of those in Group 11 had income at or below 150 percent of the FPL.

Table II-11
Ameren Electric Service Territory by PUMA
Households Below Indicated Poverty Levels

Poverty Level	Electric Service Households in Analyzed Territory					
	PUMA 1	PUMA 2	PUMA 3	PUMA 4	PUMA 5	PUMA 6
	Northeast Missouri	Lincoln, Warren, Audrain, Pike, Montgomery	Cole, Callaway, Moniteau, & Osage	Boone	Franklin	St. Charles
Total # Households	44,930	50,624	53,868	65,625	39,592	143,211
100% FPL	14%	9%	10%	11%	8%	4%
150% FPL	25%	19%	17%	19%	16%	8%
200% FPL	37%	29%	26%	29%	26%	14%
250% FPL	46%	39%	35%	38%	34%	20%
300% FPL	56%	50%	43%	46%	44%	27%

Poverty Level	Electric Service Households in Analyzed Territory				
	PUMA 7	PUMA 8	PUMA 9	PUMA 10	PUMA 11
	St. Louis (County)	St. Louis (City)	Jefferson	St. Francois, Washington, Perry, Ste. Genevieve	Dunklin, Stoddard, New Madrid, Pemiscot, Mississippi
Total # Households	391,801	132,558	83,834	45,788	41,519
100% FPL	8%	17%	8%	12%	21%
150% FPL	14%	27%	14%	25%	36%
200% FPL	21%	36%	23%	37%	48%
250% FPL	29%	44%	32%	47%	58%
300% FPL	37%	52%	42%	55%	68%

Table II-12 displays the poverty level distributions for households with income at or below 300 percent of the poverty level in each of the PUMA Groups. There was notable variability in the distribution across PUMA Groups.

Table II-12
Ameren Electric Service Territory by PUMA
Poverty Level Distribution

Poverty Group	Electric Service Households in Analyzed Territory					
	PUMA 1	PUMA 2	PUMA 3	PUMA 4	PUMA 5	PUMA 6
	Northeast Missouri	Lincoln, Warren, Audrain, Pike, Montgomery	Cole, Callaway, Moniteau, & Osage	Boone	Franklin	St. Charles
# Households ≤ 300%	25,063	25,139	23,281	30,031	17,603	39,225
0% - 100%	24%	18%	23%	25%	17%	16%
101% - 150%	21%	19%	17%	17%	18%	14%
151% - 200%	21%	20%	20%	22%	22%	20%
201% - 250%	17%	20%	22%	18%	19%	22%
251% - 300%	17%	22%	19%	18%	23%	28%
Total	100%	100%	100%	100%	100%	100%

Poverty Group	Electric Service Households in Analyzed Territory				
	PUMA 7	PUMA 8	PUMA 9	PUMA 10	PUMA 11
	St. Louis (County)	St. Louis (City)	Jefferson	St. Francois, Washington, Perry, Ste. Genevieve	Dunklin, Stoddard, New Madrid, Pemiscot, Mississippi
# Households ≤ 300%	143,804	68,574	34,889	25,081	28,255
0% - 100%	21%	32%	20%	22%	32%
101% - 150%	16%	21%	15%	24%	21%
151% - 200%	19%	17%	20%	22%	18%
201% - 250%	22%	16%	22%	17%	15%
251% - 300%	22%	15%	24%	15%	14%
Total	100%	100%	100%	100%	100%

Table II-13 displays the percent of households at or below 300 percent of the poverty level that included a child under 18, an elderly member, or a disabled member by PUMA Group.

- Children Under 18: The percentage ranged from 29 percent in the city of St. Louis to 40 percent in Jefferson County and in Cole, Callaway, Moniteau, and Osage counties combined.
- Elderly: Boone County had only 24 percent of households with an elderly member and St. Charles County had 43 percent of households with an elderly member.
- Disabled: PUMA Groups 10 and 11 in the southeast had the highest proportion of households with a disabled member.

Table II-13
Ameren Electric Service Territory by PUMA
Vulnerable Households

Vulnerable Households	Electric Service Households in Analyzed Territory					
	PUMA 1	PUMA 2	PUMA 3	PUMA 4	PUMA 5	PUMA 6
	Northeast Missouri	Lincoln, Warren, Audrain, Pike, Montgomery	Cole, Callaway, Moniteau, & Osage	Boone	Franklin	St. Charles
# Households ≤ 300%	25,063	25,139	23,281	30,031	17,603	39,225
Child Under 18	31%	39%	40%	33%	38%	34%
Elderly Member	39%	35%	35%	24%	36%	43%
Disabled Member	34%	38%	27%	28%	39%	30%

Vulnerable Households	Electric Service Households in Analyzed Territory				
	PUMA 7	PUMA 8	PUMA 9	PUMA 10	PUMA 11
	St. Louis (County)	St. Louis (City)	Jefferson	St. Francois, Washington, Perry, Ste. Genevieve	Dunklin, Stoddard, New Madrid, Pemiscot, Mississippi
# Households ≤ 300%	143,804	68,574	34,889	25,081	28,255
Child Under 18	32%	29%	40%	31%	33%
Elderly Member	37%	28%	36%	40%	36%
Disabled Member	32%	33%	36%	48%	48%

Table II-14 displays the language spoken at home by PUMA Group among households with income at or below 300 percent of the poverty level. There was little variability in the languages spoken across Ameren's service territory and more than 90 percent of households spoke English in all but two of the PUMA Groups. Spanish speaking households were most heavily concentrated around St. Louis, in St. Charles, and in the southeast region.

Table II-14
Ameren Electric Service Territory by PUMA
Language Spoken at Home

Language	Electric Service Households in Analyzed Territory					
	PUMA 1	PUMA 2	PUMA 3	PUMA 4	PUMA 5	PUMA 6
	Northeast Missouri	Lincoln, Warren, Audrain, Pike, Montgomery	Cole, Callaway, Moniteau, & Osage	Boone	Franklin	St. Charles
# Households ≤ 300%	25,063	25,139	23,281	30,031	17,603	39,225
English	96%	97%	97%	92%	97%	93%
Spanish	1%	1%	2%	1%	2%	4%
Indo-European	2%	<1%	1%	3%	1%	1%
Other	1%	1%	1%	4%	<1%	2%
Total	100%	100%	100%	100%	100%	100%

Language	Electric Service Households in Analyzed Territory				
	PUMA 7	PUMA 8	PUMA 9	PUMA 10	PUMA 11
	St. Louis (County)	St. Louis (City)	Jefferson	St. Francois, Washington, Perry, Ste. Genevieve	Dunklin, Stoddard, New Madrid, Pemiscot, Mississippi
# Households ≤ 300%	143,804	68,574	34,889	25,081	28,255
English	89%	89%	95%	98%	95%
Spanish	3%	3%	2%	<1%	5%
Indo-European	4%	3%	3%	1%	1%
Other	4%	4%	<1%	1%	<1%
Total	100%	100%	100%	100%	100%

Table II-15 displays the mean annual energy bill and mean annual energy burden for households at or below each of the indicated poverty levels by PUMA Group. There was only slight variation among the PUMA Groups and every Group’s mean burden for those below 100 percent of the FPL was within three points of the overall mean burden of 19 percent.

Table II-15
Ameren Electric Service Territory by PUMA
Mean Energy Bills and Burden

Poverty Level	Electric Service Households in Analyzed Territory											
	PUMA 1		PUMA 2		PUMA 3		PUMA 4		PUMA 5		PUMA 6	
	Northeast Missouri		Lincoln, Warren, Audrain, Pike, Montgomery		Cole, Callaway, Moniteau, & Osage		Boone		Franklin		St. Charles	
	\$	Burden	\$	Burden	\$	Burden	\$	Burden	\$	Burden	\$	Burden
100% FPL	\$1,846	18%	\$1,966	19%	\$1,888	21%	\$1,773	18%	\$2,083	22%	\$1,668	18%
150% FPL	\$1,879	12%	\$2,086	11%	\$1,801	12%	\$1,713	11%	\$2,005	12%	\$1,635	11%
200% FPL	\$1,937	9%	\$2,097	9%	\$1,804	9%	\$1,789	8%	\$1,958	9%	\$1,670	8%
250% FPL	\$1,973	8%	\$2,042	7%	\$1,849	7%	\$1,759	7%	\$1,947	7%	\$1,646	6%
300% FPL	\$1,981	7%	\$2,040	6%	\$1,853	6%	\$1,792	6%	\$1,947	6%	\$1,636	5%

Poverty Level	Electric Service Households in Analyzed Territory									
	PUMA 7		PUMA 8		PUMA 9		PUMA 10		PUMA 11	
	St. Louis (County)		St. Louis (City)		Jefferson		St. Francois, Washington, Perry, Ste. Genevieve		Dunklin, Stoddard, New Madrid, Pemiscot, Mississippi	
	\$	Burden	\$	Burden	\$	Burden	\$	Burden	\$	Burden
100% FPL	\$1,543	17%	\$1,784	21%	\$1,870	19%	\$1,942	16%	\$1,869	18%
150% FPL	\$1,542	10%	\$1,757	13%	\$1,868	12%	\$1,925	11%	\$1,789	12%
200% FPL	\$1,527	8%	\$1,700	10%	\$1,912	9%	\$1,949	9%	\$1,825	9%
250% FPL	\$1,499	6%	\$1,686	8%	\$1,959	7%	\$1,923	8%	\$1,910	8%
300% FPL	\$1,489	5%	\$1,654	7%	\$2,018	6%	\$1,950	7%	\$1,909	7%

D. Participation

Table II-16 displays the number of participants in Keeping Current and Keeping Cooling as of July 2020.

Table II-16
Keeping Current Participation, July 2020

Keeping Current Electric Heating	Keeping Current Alternative Heating	Keeping Current Total	Keeping Cooling	All Participants
1,266	291	1,557	739	2,296

Eligibility for Keeping Current and Keeping Cooling is 150 percent of the FPL, although Keeping Cooling participants between 100 and 150 percent of the FPL must also use electricity for cooling and be elderly, disabled, have a chronic medical condition, or live in a household with children five years of age or younger.

Table II-17 shows that only 1.2 percent of households at or below 150 percent of the FPL participated in Ameren's Keeping Current or Keeping Cooling Programs. However, the Keeping Current program is targeted to those households who agencies feel will be able to make their monthly payments, remain on the program, and receive arrearage forgiveness, so this is only a subset of the income-eligible population.

Table II-17
Keeping Current Participation Rate, July 2020

	Keeping Current – Electric Heating	Keeping Current – Alternative Heating	Keeping Current & Keeping Cooling
Participants	1,266	291	2,296
≤150% FPL	78,375	110,547	188,922
Participation Rate	1.6%	0.3%	1.2%

If eligibility was increased to 250 percent of the FPL and households participated at the same rate as the currently eligible do, expected participation would be 1.2 percent of 368,418 households or 4,421 households. However, the number of households at these poverty levels has probably increased due to the economic downturn.

E. Summary

This section provided an analysis of the characteristics of customers in Ameren Missouri's electric service territory who had income at various poverty levels. Key findings from the analysis are summarized below.

- *Service Type:* The majority of households in Ameren's service territory had non-electric heating service. Non-electric heating was especially prevalent among low-income households in the St. Louis area, northeast Missouri, and St. Charles. Electric heating customers were more likely to have income at lower poverty levels.
- *Households at or Below Indicated Poverty Levels:* Ten percent of the households in Ameren Missouri's service territory had income at or below the poverty level and 17 percent had income at or below 150 percent of the poverty level. If Keeping Current eligibility was expanded to 250 percent of the poverty level, 34 percent of Ameren's customers would be income eligible.

Households at or below 150 percent of the poverty level were more heavily concentrated in the southeast part of Ameren's service territory, the city of St. Louis, and Northeast Missouri.

- *Vulnerable Households:* Thirty-six percent of households at or below 150 percent of the poverty level had a child under 18, 31 percent had a household member over 62, and 39 percent had a disabled household member. These vulnerable households may have the greatest need for bill assistance.
 - Jefferson County and in Cole, Callaway, Moniteau, and Osage counties combined were most likely to have households with children under 18.
 - St. Charles County was most likely to have households with an elderly member.
 - The southeastern part of Ameren's service territory was mostly like to have households with a disabled member.
- *Language:* Approximately eight percent of low-income households spoke a language other than English, and approximately three percent spoke Spanish. Spanish-speaking households were most heavily concentrated in the southeast part of Ameren's territory. Households that spoke languages other than English and Spanish were most heavily concentrated in the St. Louis area, Boone, and St. Charles. These are the areas where multilingual outreach is most needed.
- *Energy Burden:* The mean energy burden ranged from four percent for households between 250 and 300 percent of the poverty level to 19 percent for households at or below 100 percent of the poverty level. The mean energy burden was consistently higher for

electric heating households. There was only slight variation in energy burden across geographic regions.

- *Keeping Current Participation:* Only 1.2 percent of households at or below 150 percent of the poverty level participated in Ameren's Keeping Current or Keeping Cooling Programs.

However, the Keeping Current program is targeted to those households who agencies feel will be able to make their monthly payments, remain on the program, and receive arrearage forgiveness, so this is only a subset of the income-eligible population.

If eligibility was increased to 250 percent of the FPL and households participated at the same rate as the currently eligible participate, expected participation would be 1.2 percent of 368,418 households or 4,421 households. However, the number of households at these poverty levels has probably increased due to the economic downturn.

III. Goal Setting

This section reviews various goals that should be considered when assessing whether and how Ameren's Keeping Current Program should be refined. There are many different goals that can conflict with one another, so the program design needs to acknowledge how these goals are prioritized. While many programs do not explicitly define their goals in each of these areas, it is important to consider the alternatives and the choices that are explicitly or implicitly made.

The following specific areas are explored.

- Participation
- Retention
- Energy Burden
- Equity
- Arrearages
- Other Needs
- Incentives
- Other Benefit

A. *Participation*

Goals for participation will relate to program funding and budgeting decisions. In some cases, there is a set budget that can be utilized for bill payment assistance. In other cases, there is a projected budget, but actual expenditures will depend on the number of enrollments and actual benefit amounts. In this case, if enrollments are higher than expected and result in expenditures that are higher than budgeted, the utility is usually able to recover the additional costs for the program from ratepayers.

If there is a set program budget, the specific goals for participation may include the following.

- Prioritize Affordability: To meet this goal, the program would enroll those customers who are most in need of assistance and provide as much assistance as needed to reach an affordable bill. This method would prioritize affordability for those who are most in need and who choose to enroll in the program. Need for assistance would be defined as the highest energy burdens (energy bills as a percentage of income), highest energy bills, and/or lowest poverty levels. Potentially large assistance amounts would be provided to achieve affordable energy bills (this may be defined as a particular energy burden) for the participants. With a fixed program budget, this participation strategy would prioritize affordable bills for the participants over high participation rates for all eligible customers.
- Prioritize Participation Rate: To meet this goal, the program would provide extensive outreach and work to enroll all eligible and interested customers. This method would prioritize participation rates over higher bill payment assistance. Assistance levels would be set lower, if needed, to serve a higher expected number of participants within the available budget.
- Balance Competing Priorities: To meet this goal, the program would set benefits at a level that was expected to assist low-income households in need, while still assisting a certain

number of customers who requested assistance. The program would provide moderate benefits and aim for moderate participation levels.

If there is a flexible program budget that could expand as needed to accommodate higher program costs, the program would not need to choose between the options listed above. The program could aim to enroll all eligible customers and provide benefits at the level needed to meet the targeted affordability level. Given current economic conditions due to the COVID pandemic and the potential need for higher assistance among a greater number of customers, it is more likely that these decisions will need to be made.

B. Retention

Bill payment assistance programs have various strategies for assisting customers. Some are viewed as a temporary fix to pay off past due balances and meeting a short-term need for help with current bills, and others are seen as a longer-term strategy to keep low-income households connected and paying their bills for as long as the assistance is needed. Goals for program retention may include the following.

- **Specified Duration**: The program may aim to retain customers in the program for a fixed duration as defined by the program, such as a year or two years. The program would aim to help customers pay off past due amounts or reduce bills for a specified period time until customers were back on their feet. This goal may be appropriate for customers who experienced a temporary crisis such as an illness or a period of unemployment, but it is unlikely to be successful for customers with longer-term needs, such as those on fixed incomes or those who are not able to obtain employment that fully meets their income requirements.
- **Arrearage Removal**: The program may aim to retain customers until the accumulated pre-program arrearages are paid off. This type of program would only enroll customers who were behind on their bills, specify a period of time over which the customer and/or the company would pay off the arrearages, set specific conditions for company arrearage forgiveness, and remove the customer from the program once all past due amounts had been paid off. The potential success of a program designed with this goal would again depend on the customers' needs, and this design would also have the greatest chance of success for customers who faced temporary financial hardship. Under this design, customers who manage to pay off their arrears may question why they are being removed from the program, and state that they are still unable to afford the full monthly bill. If customers are told that they can re-enroll if they build up arrearages again, the design creates an adverse incentive for bill payment. This policy would not be beneficial for the customer or the ratepayers.
- **Full Bill Affordability**: The program may aim to retain customers in the program until they can afford their utility bills without a subsidy. Full bill affordability may be reached prior to the time that the customer's income exceeds the program's guidelines if the customer participates in an energy efficiency program that reduces usage to an affordable level, the customer begins to regularly apply for LIHEAP assistance, or the customer's bill is gradually increased over a period of time until the customer pays the full monthly bill.

- **Income Eligible:** The program may aim to have customers continue to participate in the program until their income exceeds the eligibility level. The goal is to provide an affordable payment level through a reduced bill as long as the customer is eligible for the program.
- **Program Compliant:** Regardless of which retention goal is chosen, the program may keep the customer on as a program participant as long as the customer is not terminated due to nonpayment, or the customer may be removed after a certain number of missed payments.

C. Energy Burden

Energy burden, the percentage of income that is spent on energy, has been found to be a useful indicator of energy affordability. Programs that aim to achieve a specific affordability level often set a goal for the post-benefit energy burden. Other program assistance goals relate to the amount of benefits provided.

- **Benefit Level:** Some programs aim to provide a fixed benefit amount to participants, which may vary by income or by poverty level. Table III-1 provides an example where the benefit level is fixed. This results in a higher burden for the household in the lowest poverty level group.

**Table III-1
Fixed Benefit**

Poverty Level	Income	Pre-Benefit		Benefit	Post-Benefit	
		Bill	Burden		Bill	Burden
<=50%	\$10,000	\$2,000	20.0%	\$700	\$1,300	13.0%
51%-100%	\$20,000	\$2,000	10.0%	\$700	\$1,300	6.5%
101%-150%	\$35,000	\$2,000	5.7%	\$700	\$1,300	3.7%

- **Fixed Burden:** Other programs aim to reduce the energy burden for all participants to a specified level, such as six percent for electric heating customers. Table III-2 shows an example where a customer in the two lowest poverty level groups would reach a six percent burden and a customer with income between 100 and 150 percent of the poverty level would not receive a benefit because that customer's pre-benefit energy burden was only 5.7 percent. Note that energy burden goals may not be reached if the customer does not participate in the program for the full year, if the program is not structured as a percentage of income plan, or if the program has a minimum monthly bill or a maximum annual credit.

**Table III-2
Fixed Burden Target**

Poverty Level	Income	Pre-Benefit		Benefit	Post-Benefit	
		Bill	Burden		Bill	Burden
≤50%	\$10,000	\$2,000	20.0%	\$1,400	\$600	6.0%
51%-100%	\$20,000	\$2,000	10.0%	\$800	\$1,200	6.0%
101%-150%	\$35,000	\$2,000	5.7%	\$0	\$2,000	5.7%

- **Burden by Poverty Level:** Other programs aim to reach a lower targeted energy burden for the lowest poverty level customers. Table III-3 shows an example where a customer with income below 50 percent of the poverty level would have a post-benefit burden of four percent, a customer with income between 51 and 100 percent of poverty would have a post-benefit burden of six percent, and the customer with income between 101 and 150 percent of the poverty level would not receive a benefit because that customer's pre-benefit energy burden was only 5.7 percent.

**Table III-3
Burden Varying by Poverty Level**

Poverty Level	Income	Pre-Benefit		Burden Target	Benefit	Post-Benefit	
		Bill	Burden			Bill	Burden
≤50%	\$10,000	\$2,000	20.0%	4.0%	\$1,600	\$400	4.0%
51%-100%	\$20,000	\$2,000	10.0%	6.0%	\$800	\$1,200	6.0%
101%-150%	\$35,000	\$2,000	5.7%	8.0%	\$0	\$2,000	5.7%

- **Varying Assistance:** Some programs have a goal to provide additional assistance to high-burden customers depending on their needs. This additional assistance may come in the form of energy efficiency, other types of financial assistance, or case management.

D. Equity

Equity goals may relate to equality of the benefit amount for customers with similar characteristics or equality of the post-benefit energy burden for customers with similar characteristics. Discussion and examples are provided below.

- **Benefit Equality:** With this goal, a program would aim to provide the same benefit level for all customers in a poverty level group, or with other similar characteristics. Table III-4 provides an example for customers below 50 percent of the poverty level. The table shows that there can be considerable variation in energy burden within a poverty level group. The examples in the table show a pre-benefit energy burden ranging from 15.4 percent to 66.7 percent and a post-benefit energy burden ranging from 7.7 percent to 33.3 percent. The table shows that while this structure of equal benefits provides a significant burden reduction for each customer, the two customers with the lower income levels, and

especially the customer with the \$3,000 annual income, have a high energy burden following receipt of program assistance.

**Table III-4
Benefit Equality**

Poverty Level	Income	Pre-Benefit		Benefit	Post-Benefit	
		Bill	Burden		Bill	Burden
<=50%	\$3,000	\$2,000	66.7%	\$1,000	\$1,000	33.3%
<=50%	\$8,000	\$2,000	25.0%	\$1,000	\$1,000	12.5%
<=50%	\$13,000	\$2,000	15.4%	\$1,000	\$1,000	7.7%

- **Energy Burden Equality:** With this goal, a program would aim to achieve the same energy burden target for customers within a poverty level group or with other similar characteristics. Table III-5 shows that benefit levels would need to vary considerably to achieve the equalized post-benefit burden and that the benefit for the lowest-income customer would be very high, at \$1,820. Even programs that have an equal burden goal sometimes place a limit on the maximum benefit or minimum monthly payment to control program costs.

**Table III-5
Energy Burden Equality**

Poverty Level	Income	Pre-Benefit		Benefit	Post-Benefit	
		Bill	Burden		Bill	Burden
<=50%	\$3,000	\$2,000	66.7%	\$1,820	\$180	6.0%
<=50%	\$8,000	\$2,000	25.0%	\$1,520	\$480	6.0%
<=50%	\$13,000	\$2,000	15.4%	\$1,220	\$780	6.0%

E. Arrearages

Programs may aim to prevent the accumulation of additional arrearages for program participants, or to eliminate arrearages that have been developed prior to program participation.

- **Arrearage Accumulation:** Programs sometimes focus on helping the customer to pay the current energy bill, without addressing pre-program arrearages that have been built up. Such a program would only provide assistance on the current bill.
- **Arrearage Elimination:** Other programs aim to eliminate arrearages that were developed prior to program participation. Programs that have an arrearage reduction goal typically provide a set percentage reduction of pre-program arrearages each month (sometimes with a small participant co-pay), sometimes with a requirement that the participant pay the monthly obligation on time, and in full, in order to receive the arrearage forgiveness.

F. Other Needs

Some programs focus strictly on the energy bill, and others have additional goals for assisting the participant.

- Other Household Expenses: Some programs aim to increase the affordability of household expenses in addition to the energy bill. These programs may provide holistic case management or referral services to educate customers about additional benefits and services for which they may be eligible.
- Comfort, Health, and Safety: Other programs focus on participants' housing needs and refer or enroll customers in the utility's low-income energy efficiency program, the state Weatherization Assistance Program (WAP), and/or home repair programs. Some of these services can reduce the customers' energy bills and further improve bill affordability or reduce the ratepayer cost for participant bill subsidies.

G. Incentives

Bill payment assistance programs sometimes consider other incentives that the program benefit structure may or may not provide.

- Bill Payment: Programs may aim to incentivize customers to make regular and timely bill payment. This is often done by providing forgiveness of pre-program arrearages when customers make their payments on time and in full. If payment is required to obtain the arrearage forgiveness, it is important to ensure that participants understand those program parameters and potential forgiveness of a large debt to the utility.
- Usage Stabilization: Program designers are often concerned that the program structure could lead to an increase in energy usage. The literature has not shown a relationship between Percentage of Income Payment Programs (PIPPs) (where customers' bills relate to their income rather than their energy usage) and increased energy usage. However, program designers are often concerned that a PIPP will result in increased energy usage.
- Usage Reduction: Programs sometimes aim to incentivize customers to reduce energy usage. While not commonly seen, programs have included a conservation incentive bonus to customers who reduce their usage by a certain percentage. Programs that aim to reduce usage should focus on participants with high energy usage and refer those customers to the utility's low-income energy efficiency program. Sometimes such programs require bill payment assistance participants to accept energy efficiency services as a condition for continued participation in the bill payment assistance program.

H. Other Benefits

Programs can improve their potential for success by assisting customers to receive other services. Some bill payment assistance programs provide specific goals for other benefit receipt.

- LIHEAP: Customers who participate in the utility's bill payment assistance program may not apply for LIHEAP or stop applying for LIHEAP because they no longer need that assistance. Programs that do not provide extensive LIHEAP outreach often experience a

reduction in LIHEAP participation following enrollment in the utility's bill payment assistance program.

- WAP: Programs may have a goal for WAP or utility energy efficiency program participation. Bill payment assistance programs with that goal may require their high-usage participants to accept the utility's energy efficiency services to continue receiving the utility discount or credit.
- Case Management: Some programs aim to assist customers with needs outside of energy bill payment. These programs may provide holistic case management to help customers receive other needed assistance.

I. Summary

Key information on potential goals for utility bill payment assistance programs is summarized below.

- *Participation*: Given a set or limited budget, the program may prioritize affordability, with fewer participants; participation rates, with lower benefit levels; or a balance between these two goals.
- *Retention*: Goals for program retention may include enrollment for a specified duration, until pre-program arrearages are removed, until customers can afford the full bill, or as long as customers are eligible for the program.
- *Energy Burden*: Programs may aim for a fixed benefit level, potentially varying by income or poverty level; a fixed post-benefit energy burden for all participants; or a post-benefit energy burden that varies by poverty level.
- *Equity*: Goals for equity may relate to equal benefits, or equal post-benefit energy burdens.
- *Arrearages*: Some programs focus on the current bill and others also aim to eliminate arrearages that were developed prior to program participation.
- *Other Needs*: Some programs focus strictly on the energy bill, others provide referrals with a goal of increasing the affordability of other household expenses, and others provide energy efficiency services or repair referral services to improve the home condition and energy efficiency.
- *Incentives*: Programs sometimes design benefits with the goal of improving bill payment compliance, or stabilizing or reducing energy usage.
- *Other Benefits*: Programs may have goals for other benefit receipt including LIHEAP, WAP, or other needed services or assistance.

IV. Parameter Selection

This section reviews program parameters from bill payment assistance programs around the country.

A. Administration and Enrollment

Table IV-1 shows how the program administration and enrollment responsibilities are divided between the utility and/or state, contractor(s), and/or community-based organizations. Customer intake for the bill payment assistance programs is conducted by local agencies, state government agencies, community-based organizations, contractors, and utility companies.

- **Utility Administration:** Eighteen programs have the utility company as the program administrator. Utility companies have the advantage of complete access to customer billing and payment histories and direct application of benefits.
- **State Agencies:** Nine programs have a state agency as the program administrator. State agencies that administer these programs usually administer LIHEAP as well, so they have the potential advantage of access to other program participation and application information. This could allow for enrollment without the collection of additional data or documentation.

Intake for these programs is often conducted by local community agencies. These agencies interact with the low-income households on other program benefits and have often already developed a trusted relationship with the client.

**Table IV-1
Program Administration**

State	Program Name	Administrator Type	Program Administrator	Intake	Benefit Award
CA	Energy Assistance Program Rate (EAPR) ¹	Municipal Utility	Sacramento Municipal Utility-District	Local Agencies Contractors	-
CO	Colorado Natural Gas Customer Assistance Program (CAP) ²	Utility	Colorado Natural Gas Energy Outreach Colorado (EOC) Colorado LIHEAP	-	-
CO	SourceGas Percentage of Income Payment Plan (PIPP) ²	Utility	SourceGas Colorado LIHEAP	-	-
CO	Xcel Energy Affordability Program (EAP) ²	Utility	Xcel Energy Colorado LIHEAP	-	-
DC	Residential Aid Discount (RAD) ³	State Agency	Department of Energy & Environment	DOEE Local Agencies	PEPCO
DC	Residential Essential Service (RES) ⁴	State Agency	Department of Energy & Environment	DOEE Local Agencies	WGL

State	Program Name	Administrator Type	Program Administrator	Intake	Benefit Award
IL	Percentage of Income Payment Plan (PIPP) ²	State Agency	Department of Commerce & Economic Opportunity	Local Agencies	Ameren IL, ComEd, Nicor Gas, Peoples Gas/North Shore Gas
KY	LG&E-KU Home Energy Assistance Program (HEA) ¹	Utility	LG&E and KU	Local Agencies	LG&E and KU
MD	Electric Universal Services Program (EUSP) ⁵	State Agency	Maryland Department of Human Services	Local Agencies	-
ME	Central Maine Electric Lifeline Program (ELP) ²	State Agency	Maine State Housing Authority Local Agencies	Local Agencies	-
MN	CenterPoint Energy Gas Affordability Program (GAP) ²	Utility	CenterPoint Local Agencies	-	-
MN	Great Plains Natural Gas – Gas Affordability Program (GAP) ²	Utility	Great Plains Natural Gas Local Agencies	-	-
MN	IPL/MERC Gas Affordability Program (GAP) ²	Utility	IPL/MERC Local Agencies	-	-
MN	Xcel Energy Gas Affordability Program (GAP) ²	Utility	Xcel Energy Local Agencies	-	-
NH	Electric Assistance Program (EAP) ²	State Agency	Office of Energy & Planning	Local Agencies	-
NJ	Universal Service Fund (USF) ²	State Agency	Department of Community Affairs	Department of Community Affairs	-
NV	Fixed Annual Credit (FAC) ²	State Agency	Department of Health & Human Services	Department of Health & Human Services Local Agencies	-
OH	Percentage of Income Payment Plan Plus (PIPP) ¹	State Agency	Ohio Development Services Agency	Local Agencies State of Ohio	-
PA	Allegheny Low Income Payment & Usage Reduction Program (LIPURP) ¹	Utility	Allegheny	Dollar Energy Local Agencies	Allegheny
PA	Duquesne Light Customer Assistance Program (CAP) ¹	Utility	Duquesne Light	Holy Family Institute (HFI) Catholic Charities	Duquesne Light
PA	FirstEnergy Pennsylvania Customer Assistance Program (PCAP) ¹	Utility	FirstEnergy	Local Agencies	FirstEnergy
PA	NFG Low-Income Residential Assistance Program (LIRA) ¹	Utility	National Fuel Gas	Contractor	National Fuel Gas
PA	PECO Customer Assistance Program (CAP) ¹	Utility	PECO	PECO	PECO
PA	People's Gas Customer Assistance Program (CAP) ¹	Utility	People's Gas	Dollar Energy Fund Local Agencies	People's Gas

State	Program Name	Administrator Type	Program Administrator	Intake	Benefit Award
PA	PGW Customer Responsibility Program (CRP) ¹	Utility	PGW	PGW	PGW
PA	PPL OnTrack (CAP) ¹	Utility	PPL	Local Agencies	PPL
PA	UGI Customer Assistance Program (CAP) ¹	Utility	UGI Local Agencies	Local Agencies	UGI

Sources: 1) APPRISE Evaluation 2) LIHEAP Clearinghouse: Ratepayer Funded Programs 3) Pepco's RAD Tariff – Revised (Docket FC1120-59) 4) WGL's Annual RES Surcharge Current Factor (Docket FC1127-114) 5) EUSP. 2019. Annual Administrative Report.

B. Budget and Participants

Table IV-2 displays the program funding source and budget, the number of households served, and the average annual benefit. Most of the programs are funded by ratepayers, but there are significant differences between the programs in terms of the budget, number of customers served, and benefit levels. These differences will impact the type of administration that is needed for the program.

- **Budget:** The amount of funding varies widely, ranging from \$37,769 for a small utility program, to \$220.8 million for a statewide electric program. The mean funding across all programs is \$38 million.
- **Participants:** The number of households served ranges from 180 to 359,655 households with a mean of 55,588.
- **Benefit Level:** The average annual benefit ranges from \$72 to \$1,206 and can depend on the customer's fuel type. The mean benefit across all programs and fuel types is \$600.

Table IV-2
Program Funding & Households Served

State	Program Name	Funding Source	Budget (Millions)	Participants	Mean Annual Benefit
CA	Energy Assistance Program Rate (EAPR, 2010) ¹	Ratepayers	\$33.6	100,849	\$343
CO	Colorado Natural Gas Customer Assistance Program (CAP, 2015) ²	Ratepayers	< \$0.1	180	-
CO	SourceGas Percentage of Income Payment Plan (PIPP, 2015) ²	Ratepayers	\$0.2	4,375	-
CO	Xcel Energy Affordability Program (EAP, 2015) ²	Ratepayers	\$6.8	24,009	-
DC	Residential Aid Discount (RAD, 2019) ³	Electric Ratepayers	\$5.8	20,565	\$272
DC	Residential Essential Service (RES, 2019) ⁴	Natural Gas Ratepayers	\$0.5	6,877	\$72
IL	Percentage of Income Payment Plan (PIPP, 2015) ²	Ratepayers	\$72.7	55,863	-
KY	LG&E-KU Home Energy Assistance Program (HEA, 2013) ¹	Ratepayers & Donations	\$2.1	LG&E: 2,515 KU: 3,511	LG&E: \$641 KU: \$391
MD	Electric Universal Services Program (EUSP, FY 2019) ⁵	Ratepayers & State	\$60.8	93,523	\$650
ME	Central Maine Electric Lifeline Program (ELP, 2015) ²	Ratepayers	\$8.0	11,500	\$285 ⁵

State	Program Name	Funding Source	Budget (Millions)	Participants	Mean Annual Benefit
MN	CenterPoint Energy Gas Affordability Program (GAP, 2015) ²	Ratepayers	\$10.2	27,177	-
MN	IPL/MERC Gas Affordability Program (GAP, 2015) ²	Ratepayers			
MN	Great Plains Natural Gas – Gas Affordability Program (GAP, 2015) ²	Ratepayers			
MN	Xcel Energy Gas Affordability Program (GAP, 2015) ²	Ratepayers			
NH	Electric Assistance Program (EAP, 2014) ²	Electric Ratepayers	\$13.6	33,444	-
NJ	Universal Service Fund (USF, FY 2018) ⁶	Ratepayers	\$105.4	162,000	-
NV	Fixed Annual Credit (FAC, 2015) ²	Ratepayers	\$9.2	27,370	\$776
OH	Percentage of Income Payment Plan Plus-Electric (PIPP, 2014) ¹	Ratepayers	\$220.8	359,655	Elec Heat: \$1,206 Non-Elec Heat: \$689
PA	Allegheny Low Income Payment & Usage Reduction Program (LIPURP, 2009) ¹	Ratepayers & Shareholders	\$5.9	29,957	\$201
PA	Duquesne Light Customer Assistance Program (CAP, 2013) ¹	Ratepayers	\$31.2	31,379	Elec Heat: \$354 Non-Elec Heat: \$253
PA	FirstEnergy Pennsylvania Customer Assistance Program (PCAP, 2015) ¹	Ratepayers	\$43.1	68,351	Elec Heat: \$914 Non-Elec Heat: \$592
PA	NFG Low-Income Residential Assistance Program (LIRA, 2019) ¹	Ratepayers	\$2.4	9,856	\$219
PA	PECO Customer Assistance Program (CAP, 2018) ¹	Ratepayers	\$97.8	120,122	Elec & Gas: \$457 Elec Only: \$431
PA	People's Gas Customer Assistance Program (CAP, 2015) ¹	Ratepayers	\$9.8	36,426	\$467
PA	PGW Customer Responsibility Program (CRP, 2017) ¹	Ratepayers	\$58.4	62,200	\$703
PA	PPL OnTrack (CAP, 2018) ¹	Ratepayers	\$106.0	82,661	Elec Heat: \$1,087 Non-Elec Heat: \$626
PA	UGI Customer Assistance Program (CAP, 2011) ¹	Ratepayers	\$7.2	15,333	\$294
Mean		-	\$38.0	55,588	\$600

Sources: 1) APPRISE Evaluation Report 2) LIHEAP Clearinghouse Ratepayer Funded Programs 3) Pepco's RAD Tariff – Revised (Docket FC1120-59) 4) WGL's Annual Residential Essential Service Surcharge Current Factor (Docket FC1127-114) 5) EUSP. 2019. Annual Administrative Report 6) Communication with Maureen Clerc, Utility, Program Manager, NJ BPU. 2020

Note: See 2018 Report on Universal Service Programs & Collections Performance for most recent estimates on Pennsylvania CAP Program Discounts

C. Outreach

Table IV-3 shows that the programs use a variety of outreach methods to develop awareness among potential clients. Use of many different types of outreach methods provides the opportunity to reach the various segments of the population that prefer one type of contact over another.

Outreach methods include the following.

- Utility Bill Inserts: Used by nine programs.
- Mailed Information to Targeted Groups: Used by five programs.
- Community Events: Used by ten programs.
- Company's Website: Used by 13 programs.
- Company Representatives: Used by ten programs.
- Partnering with Local Agencies: Used by 12 programs.
- United Way Outreach: Used by four programs.

Other outreach methods include posting information at mass transit sites and partnering with elected officials to spread awareness of the programs. The most common outreach methods are posting on the company website and partnering with local agencies.

**Table IV-3
Program Outreach**

State	Program Name	Outreach Methods ¹							
		Bill Inserts	Targeted Mailings	Community Events	Company Website	Company Reps	Local Agencies	United Way	Other
CA	Energy Assistance Program Rate (EAPR) ¹	X	-	X	X	X	X	-	-
KY	LG&E-KU Home Energy Assistance Program (HEA) ¹	-	-	-	X	-	X	X	-
OH	Percentage of Income Payment Plan Plus (PIPP) ¹	X	-	X	X	X	-	-	-
NH	Electric Assistance Program (EAP) ²	-	X	-	X	-	X	-	-
NV	Fixed Annual Credit (FAC) ³	-	-	X	X	-	X	-	X
PA	Allegheny Low Income Payment & Usage Reduction Program (LIPURP) ¹	-	-	X	X	X	X	-	X
PA	Duquesne Light Customer Assistance Program (CAP) ¹	X	-	X	X	X	X	X	X
PA	FirstEnergy Pennsylvania Customer Assistance Program (PCAP) ¹	X	-	-	X	X	X	-	-
PA	NFG Low-Income Residential Assistance Program (LIRA) ¹	-	X	X	X	X	X	X	X
PA	PECO Customer Assistance Program (CAP) ¹	X	X	X	X	X	X	-	X
PA	People's Gas Customer Assistance Program (CAP) ¹	X		X	X	X	X	X	-

¹Only programs with available information are included in the table.

State	Program Name	Outreach Methods ¹							
		Bill Inserts	Targeted Mailings	Community Events	Company Website	Company Reps	Local Agencies	United Way	Other
PA	PGW Customer Responsibility Program (CRP) ¹	X	X	X	X	X	X	-	-
PA	PPL OnTrack (CAP) ¹	X	X	X	X	X	X	-	X
PA	UGI Customer Assistance Program (CAP) ¹	X	-	-	-	-	-	-	X
Total		9	5	10	13	10	12	4	7

Sources: 1) APRISE Evaluation Report 2) NH EAP. 2015. CAA Procedures Manual 3) NV Department of Welfare and Social Services 2019. Energy Assistance Programs Evaluation.

In addition to the program review, we conducted in-depth telephone interviews with four of Ameren's administering agencies to understand the outreach challenges faced in different parts of the service territory and the types of outreach that work best for the individual agencies. The following agencies were interviewed.

- East Missouri Action Agency (EMAA): EMAA serves eight rural counties in southeast Missouri. They provide housing, weatherization, and women's wellness assistance in addition to Head Start and community services.
- Good Samaritan Center (GSC): GSC serves two rural counties in northwest Missouri. They cater specifically to low-income and homeless senior citizens. They provide a variety of resources for families and individuals, including assistance with budgeting, rent, food, shelter, utilities, and transportation.
- Jefferson Franklin Community Action Corporation (JFCAC): JFCAC serves Jefferson and Franklin counties in eastern Missouri. This area is a mixture of suburban and rural. They provide recovery support, behavioral health, Women Infants and Children (WIC), and Head Start services. They additionally provide assistance for housing, weatherization, and energy.
- People's Community Action Corporation (PCAC): PCAC serves the city of St. Louis and the small, neighboring city of Wellston. They offer a wide range of services including food services, youth programs and youth employment programs, school-based counseling programs, job readiness for young adults and adults, homeless prevention, energy assistance, and rental assistance.

Table IV-4 provides a summary of the characteristics of the interviewed agencies and the populations they serve.

**Table IV-4
Agency Service Area Characteristics**

Agency	Areas Served	Area Characteristics	Poverty Rate	Racial Diversity
EMAA	8 counties in Southeast MO	Very rural	15%	6% non-white
GSC	2 counties in Northwest MO	Mostly rural	<10%	12% non-white
JFCAC	2 counties in Mideast MO	Mix of suburban and rural	<10%	1% non-white
PCAC	St. Louis	Urban	25%	52% non-white

The agencies conduct outreach in a variety of ways. These methods consist of providing information during client intake, at community events, with flyers, at senior centers and complexes, through websites and social media, and by word of mouth. All four agencies conduct outreach through client intake and community events.

**Table IV-5
Agency Outreach Methods**

Agency	Client Intake	Community Events	Flyers	Senior Centers	Website/Social Media	Word of Mouth
EMAA	X	X	X		X	
GSC	X	X	X	X		X
JFCAC	X	X		X		X
PCAC	X	X	X	X	X	

All four agencies will recommend Keeping Current to clients if they believe the client will be a good fit for the program. The agencies use different criteria to determine if the client will be right for the program. All four agencies see if the client is an Ameren customer, three determine if the client can make timely payments, and two require the client to have an income.

**Table IV-6
Keeping Current Client Eligibility Assessments**

Agency	Ameren Customer	Timely Payment Ability	Income Source
EMAA	X	X	X
GSC	X	X	X
JFCAC	X	X	
PCAC	X		

Prior to the Coronavirus, all four agencies required most clients come in person to their offices to apply for Keeping Current (with some exceptions). During the Coronavirus, the agencies utilized a mixture of in-person and virtual application methods, which include phone, email, and text.

Table IV-7
Agency Keeping Current Application Process

Agency	Application Process					
	Prior to Coronavirus	During Coronavirus				
	In-Person	In-Person	Phone	Email	Text	Dropbox
EMAA	X	X				X
GSC	X	X	X	X		
JFCAC	X		X	X		
PCAC	X	X		X	X	

We also conducted telephone interviews with homeless shelters to assess whether they work with formerly homeless individuals and provide access to Ameren's Keeping Current program. It appears that homeless shelters are a good opportunity for increased access to Keeping Current.

- St. Patrick Center: St. Patrick Center works with individuals transitioning out of shelters and places them into permanent housing. St. Patrick Center provides wraparound services to help these individuals maintain their current homes. While clients are not responsible for rent payments, they are responsible for utility bill payment. St. Patrick partners with Ameren Missouri and Spire Inc. to provide resources to individuals transitioning from a homeless shelter to permanent housing. Ameren Missouri and Spire both allow case managers to log into a portal system to review clients' bill histories and make pledges to prevent disconnection of services. Clients can complete an application and St. Patrick Center can perform the intake.
- The Haven of Grace refers individuals to St. Patrick Center's rapid rehousing program that provides support for individuals to quickly exit homelessness. However, they felt it would also be helpful to partner with Ameren because some of the women who have come through The Haven of Grace have had past due utility bills and would benefit from energy assistance. The Haven of Grace is potentially interested in working with Ameren to provide energy assistance to formerly homeless individuals. They reported that while clients do not reside at the shelter for very long, they remain connected through the childcare service. They felt that Ameren could increase outreach for the Keeping Current/Keeping Cooling programs among homeless shelters.
- Gateway180 connects homeless individuals to resources and programs that reduce housing barriers. Their rapid rehousing case manager prioritizes helping individuals to secure housing and connects these individuals to utility assistance programs. Gateway180 has

spoken with Ameren but currently does not have a formal partnership. They are interested in such a partnership with their rapid rehousing program. Currently they refer clients to St. Patrick Center and the Urban League for enrollment in Keeping Current.

D. Intake

Table IV-8 shows that the programs provide different ways for customers to submit their applications. The method that will work best for a particular household will depend on the household characteristics and individual preferences.

- **In-Person Enrollment:** Some households may prefer to come into an office and can receive the additional benefit of assessment of other needs and referral to additional programs. Other households may have difficulty visiting an office due to work schedules or childcare responsibilities. Individuals who live in rural areas may reside too far from the office to visit, homebound clients will need other options, and other households may have transportation barriers. Eighteen programs reported that they offer in-person intake appointments.
- **Email and Online Enrollment:** These methods provide more flexibility and can work very well for clients who are comfortable with the technologies and have computer access at home or at a nearby public facility. Two programs allow clients to enroll via e-mail and eight allow clients to enroll online. Online application is becoming more common and participants are more frequently suggesting this option if it is not available.
- **Mail Enrollment:** This method allows clients to complete paperwork at their convenience but may result in delayed enrollment and several iterations if potential participants do not initially submit all required documentation. Thirteen programs offer clients the opportunity to enroll by mail. This was the second most common intake method.
- **Telephone and Fax:** These methods also provide flexibility and may provide greater assistance to clients that have questions about the application process. Six programs offered this intake method.

The most common intake method is in-person, followed by mail.

Table IV-8
Program Intake

State	Program Name	Intake Methods ²					# of Methods
		In-Person	Email	Mail	Online	Phone	
CA	Energy Assistance Program Rate (EAPR) ¹	X	-	X	X	-	3
DC	Residential Aid Discount (RAD) ²	X	-	-	X	X	3
DC	Residential Essential Service (RES) ³	X	-	-	-	-	1
KY	LG&E-KU Home Energy Assistance Program (HEA) ¹	X	-	X	-	-	2

²Only programs with available information are included in the table.

State	Program Name	Intake Methods ²					# of Methods
		In-Person	Email	Mail	Online	Phone	
MD	Electric Universal Services Program (EUSP) ⁴	X	-	-	X	-	2
ME	Central Maine Electric Lifeline Program (ELP) ¹	X	-	-	-	X	2
MN	CenterPoint Energy Gas Affordability Program (GAP) ⁵	-	-	X	X	-	2
MN	Great Plains Natural Gas -- Gas Affordability Program (GAP) ⁶	-	-	X	-	-	1
MN	IPL/MERC Gas Affordability Program (GAP) ⁷	-	-	X	-	-	1
MN	Xcel Energy Gas Affordability Program (GAP) ⁸	-	-	X	-	-	1
NH	Electric Assistance Program (EAP) ⁹	X	-	-	-	-	1
NJ	Universal Service Fund (USF) ¹⁰	X	-	-	-	-	1
NV	Fixed Annual Credit (FAC) ¹¹	X	X	X	-	-	3
OH	Percentage of Income Payment Plan Plus (PIPP) ¹	X	-	X	X	-	3
PA	Allegheny Low Income Payment & Usage Reduction Program (LIPURP) ¹	X	-	X	-	X	3
PA	Duquesne Light Customer Assistance Program (CAP) ¹	X	-	-	X	-	2
PA	FirstEnergy Pennsylvania Customer Assistance Program (PCAP) ¹	X	-	-	-	X	2
PA	NFG Low-Income Residential Assistance Program (LIRA) ¹	-	-	X	-	X	2
PA	PECO Customer Assistance Program (CAP) ¹	X	X	X	X	-	4
PA	PPL OnTrack (CAP) ¹	X	-	X	-	X	3
PA	People's Gas Customer Assistance Program (CAP) ¹	X	-	-	-	-	1
PA	PGW Customer Responsibility Program (CRP) ¹	X	-	X	X	-	3
PA	UGI Customer Assistance Program (CAP) ¹	X	-	-	-	-	1
Total		18	2	13	8	6	-
Average		-					2

Sources: 1) APPRISE Evaluation Report 2) PEPCO RAD Program 3) Washington Gas RES Program 4) MD DHS Applying for Energy Assistance 5) CenterPoint Energy Gas Affordability Program 6) Great Plains Natural Gas Co. Low-Income Assistance Program 7) MN Energy Resources Gas Affordability Program 8) Xcel Energy. PowerOn and Gas Affordability Program Application 9) NH EAP. 2019. Triennial Process Evaluation 10) NJ BPU USF 11) NV DHHS. Apply for Assistance.

E. Income Eligibility

Table IV-9 displays the income eligibility guidelines for the bill payment assistance programs.

- Nineteen programs determine eligibility based on percent of the Federal Poverty Level (FPL). The FPL values range from 125 to 200 percent.
 - 125% FPL: One program.
 - 130% FPL: One program.
 - 150% FPL: Thirteen programs.
 - 175% FPL: Two programs.
 - 200% FPL: Two programs.
- Two programs use 60 percent of the State Median Income (SMI).
- One program bases eligibility on household income and energy usage.
- Four programs base program eligibility on LIHEAP eligibility.

**Table IV-9
Program Income Eligibility**

State	Program Name	Income Eligibility ³			
		% FPL	% SMI	LIHEAP Receipt	Other
CA	Energy Assistance Program Rate (EAPR) ¹	200%	-	-	-
CO	Colorado Natural Gas Customer Assistance Program (CAP) ²	150%	-	-	-
CO	SourceGas Percentage of Income Payment Plan (PIPP) ²	125%	-	-	-
DC	Residential Aid Discount (RAD) ³	-	60%	-	-
DC	Residential Essential Service (RES) ³	-	60%	-	-
IL	Percentage of Income Payment Plan (PIPP) ²	150%	-	-	-
KY	LG&E-KU Home Energy Assistance Program (HEA) ²	130%	-	-	-
MD	Electric Universal Services Program (EUSP) ²	175%	-	-	-
ME	Central Maine Electric Lifeline Program (ELP) ²	-	-	-	X
MN	CenterPoint Energy Gas Affordability Program (GAP) ²	-	-	X	-
MN	Great Plains Natural Gas – Gas Affordability Program (GAP) ²	-	-	X	-
MN	IPL/MERC Gas Affordability Program (GAP) ²	-	-	X	-
MN	Xcel Energy Gas Affordability Program (GAP) ²	-	-	X	-
NH	Electric Assistance Program (EAP) ²	200%	-	-	-
NJ	Universal Service Fund (USF) ²	175%	-	-	-
NV	Fixed Annual Credit (FAC) ²	150%	-	-	-
OH	Percentage of Income Payment Plan Plus (PIPP) ¹	150%	-	-	-
PA	Allegheny Low Income Payment & Usage Reduction Program (LIPURP) ¹	150%	-	-	-
PA	Duquesne Light Customer Assistance Program (CAP) ¹	150%	-	-	-
PA	FirstEnergy Pennsylvania Customer Assistance Program (PCAP) ¹	150%	-	-	-
PA	NFG Low-Income Residential Assistance Program (LIRA) ¹	150%	-	-	-
PA	PECO Customer Assistance Program (CAP) ¹	150%	-	-	-
PA	PPL OnTrack (CAP) ¹	150%	-	-	-
PA	People's Gas Customer Assistance Program (CAP) ¹	150%	-	-	-
PA	PGW Customer Responsibility Program (CRP) ¹	150%	-	-	-
PA	UGI Customer Assistance Program (CAP) ⁴	150%	-	-	-
Total		19	2	4	1

Sources: 1) APPRISE Evaluation Report 2) LIHEAP Clearinghouse: Ratepayer Funded Programs 3) Department of Energy & Environment – Receive Discounts on Your Utility Bills.

³Only programs with available information are included in the table.

F. Other Eligibility Requirements

Table IV-10 displays other eligibility requirements, including demonstration of payment issues, budget billing participation, LIHEAP application, WAP application, and utility low-income energy efficiency program participation.

- **Payment-Troubled:** Payment-troubled customers are defined in different ways, those that have an arrearage on their account, are enrolled or have defaulted on a payment program, or have high housing and utility costs compared to their income. Some programs strictly enforce the requirement, while others list it, but allow others to enroll. Requiring customers to miss payments to enroll in a program could provide adverse incentives to potential enrollees or former participants. Three of the studied programs have this requirement. Some previously had the requirement but eliminated it.
- **Budget Billing:** Customers on budget billing pay a set amount each month that may be adjusted on a quarterly or less frequent basis. Customers prefer to have predictable energy bills and report that the consistent monthly bills make them easier to pay. Four of the listed programs require customers to enroll in budget billing.
- **LIHEAP Application:** Twelve programs, all run by utilities, require customers to enroll in LIHEAP. This benefit makes it easier for customers to meet their monthly utility payment obligations. However, some customers stop participating in LIHEAP following enrollment in the bill payment assistance program, because they feel that they no longer need the LIHEAP benefit.
- **WAP Application:** Two programs require customers to apply for the Weatherization Assistance Program (WAP), a low-income energy efficiency program run by the state.
- **Utility Low-Income Energy Efficiency Program:** Eleven of the programs report that they enforce this requirement.

**Table IV-10
Other Eligibility Requirements**

State	Program Name	Payment Troubled	Budget Billing	LIHEAP	WAP	Utility LI EE Program ⁴	Total
CO	Xcel Energy Affordability Program (EAP) ¹	-	-	X*	-	-	1
IL	Percentage of Income Payment Plan (PIPP) ²	-	X	-	X	-	2
KY	LG&E-KU Home Energy Assistance Program (HEA) ³	-	-	X	-	X	2
ME	Central Maine Electric Lifeline Program (ELP) ³	-	-	-	-	X	1
MN	CenterPoint Energy Gas Affordability Program (GAP) ¹	-	-	X*	-	-	1
MN	Great Plains Natural Gas – Gas Affordability Program (GAP) ¹	-	-	X*	-	-	1
MN	IPL/MERC Gas Affordability Program (GAP) ¹	-	-	X*	-	-	1

⁴Only programs with available information are included in the table.

State	Program Name	Payment Troubled	Budget Billing	LIHEAP	WAP	Utility LI EE Program ⁴	Total
MN	Xcel Energy Gas Affordability Program (GAP) ¹	-	-	X ¹	-	-	1
OH	Percentage of Income Payment Plan Plus (PIPP) ³	-	-	-	X	-	1
PA	Allegheny Low Income Payment & Usage Reduction Program (LIPURP) ³	-	-	X	-	X	2
PA	Duquesne Light Customer Assistance Program (CAP) ³	X	X	X	-	X	4
PA	FirstEnergy Pennsylvania Customer Assistance Program (PCAP) ³	-	X	X	-	X	3
PA	NFG Low-Income Residential Assistance Program (LIRA) ³	X	X	X	-	X	4
PA	PECO Customer Assistance Program (CAP) ³	-	-	-	-	X	1
PA	People's Gas Customer Assistance Program (CAP) ³	X	-	-	-	X	2
PA	PGW Customer Responsibility Program (CRP) ³	-	-	X	-	X	2
PA	PPL OnTrack (CAP) ³	-	-	-	-	X	1
PA	UGI Customer Assistance Program (CAP) ³	-	-	X	-	X	2
Total		3	4	12	2	11	-
Average				-			2

Sources: 1) LIHEAP Clearinghouse: Ratepayer Funded Programs 2) Illinois General Assembly, Energy Assistance Act 3) APPRISE Evaluation report
* Customers must be LIHEAP recipients to enroll in program.

G. Enrollment Level

Table IV-11 shows that some of the programs target particular enrollment levels. Some have set goals for enrollment through a minimum or maximum number of participants. However, it has become increasingly common for bill payment assistance programs to serve all applicants.

**Table IV-11
Target Enrollment Levels**

State	Program Name	Enrollment Level Target ⁵
NH	Electric Assistance Program (EAP) ¹	• Approximately 30,000 customers.
OH	Percentage of Income Payment Plan Plus (PIPP) ²	• Maximize customer participation.
PA	NFG Low-Income Residential Assistance Program (LIRA) ²	• No cap on enrollment. • Target participation rate of 9,000.
PA	PGW Customer Responsibility Program (CRP) ²	• No limit on the number of customers that can enroll.
PA	UGI Customer Assistance Program (CAP) ²	• Maximum enrollment up to 17,500 participants through 2013. If exceeded, utilities will file a petition to increase.

Sources: 1) NH EAP, 2019, Triennial Process Evaluation. 2) APPRISE Evaluation Report.

⁵Only programs with available information are included in the table.

H. Targeting

Table IV-12 displays the distribution of participants by percent of the Federal Poverty Level for the bill payment assistance programs.

- The number of customers at or below 50 percent of the FPL ranges from 18 percent to 38 percent. The mean percent at this level is 26 percent.
- The number of customers between 51 and 100 percent of the FPL ranges from 41 to 60 percent. The mean percent at this level is 48 percent.
- The number of customers between 101 and 150 percent ranges from 12 to 36 percent and the number of customers greater than 150 percent ranges from zero to five percent. The mean percent at the 101 to 150 percent level is 25 percent.

Forty-eight percent of participants are within the 51 to 100 percent of FPL category.

Table IV-12
Participant Poverty Level

State	Program Name	Year	Percent of Participants by Poverty Level ⁶			
			≤ 50%	51%-100%	101%-150%	> 150%
KY	LG&E-KU Home Energy Assistance Program (HEA) ¹	2013	24%	60%	16%	0%
OH	Percentage of Income Payment Plan Plus (PIPP) ¹	2014	38%	41%	19%	0%
PA	Allegheny Low Income Payment & Usage Reduction Program (LIPURP) ¹	2009	29%	45%	24%	1%
PA	Duquesne Light Customer Assistance Program (CAP) ¹	2013	23%	49%	23%	5%
PA	FirstEnergy Pennsylvania Customer Assistance Program (PCAP) ¹	2015	22%	46%	31%	2%
PA	NFG Low-Income Residential Assistance Program (LIRA) ¹	2019	18%	47%	35%	0%
PA	PECO Customer Assistance Program (CAP) ¹	2018	25%	45%	30%	0%
PA	People's Gas Customer Assistance Program (CAP) ¹	2015	26%	47%	27%	0%
PA	PGW Customer Responsibility Program (CRP) ¹	2017	32%	55%	12%	<1%
PA	PPL OnTrack (CAP) ¹	2018	19%	45%	36%	0%
PA	UGI Customer Assistance Program (CAP) ¹	2011	26%	52%	22%	0%
Mean			26%	48%	25%	1%

Sources: 1) APPRISE Evaluation Report.

Table IV-13 provides information on the percent of participants in vulnerable groups with various sources of income. This information provides an understanding of whether programs are serving the working poor, the elderly, families, the unemployed, or households with disabled members.

- Elderly: The percent of participants who are at least 65 years of age ranges from six to 36 percent with a mean of 18 percent.

⁶Only programs with available information are included in the table.

- Children: The percent of participants who have a child under 18 years old in the household ranges from 16 to 62 percent with a mean of 44 percent.
- Employed: The percent of employed participants ranges from 20 to 49 percent with a mean of 31 percent.
- Unemployment: The percent of participants receiving unemployment income ranges from one to five percent with a mean of three percent.
- Disability Income: The percent of customers receiving disability income ranges from less than one percent to 35 percent with a mean of 24 percent.

Table IV-13
Participant Characteristics

State	Program Name	Year	% of Participants in Vulnerable Groups		% of Participants Income Type ⁷		
			Senior	Children	Employed	Unemployed	Disability
KY	LG&E-KU Home Energy Assistance Program (HEA) ¹	2013	31%	36%	20%	2%	23%
OH	Percentage of Income Payment Plan Plus (PIPP) ¹	2014	16%	48%	33%	4%	10%
PA	Allegheny Low Income Payment & Usage Reduction Program (LIPURP) ¹	2009	11%	62%	49%	1%	<1%
PA	Duquesne Light Customer Assistance Program (CAP) ¹	2013	15%	51%	35%	5%	30%
PA	FirstEnergy Pennsylvania Customer Assistance Program (PCAP) ¹	2015	36%	16%	23%	3%	35%
PA	NFG Low-Income Residential Assistance Program (LIRA) ¹	2019	6%	38%	32%	1%	-
PA	PECO Customer Assistance Program (CAP) ¹	2018	-	-	28%	2%	23%
PA	People's Gas Customer Assistance Program (CAP) ¹	2015	27%	46%	20%	2%	11%
PA	PGW Customer Responsibility Program (CRP) ¹	2017	7%	37%	21%	2%	27%
PA	PPL OnTrack (CAP) ¹	2018	15%	58%	49%	3%	29%
Mean			18%	44%	31%	3%	24%

Sources: 1) APPRISE Evaluation Report.

I. Bill Subsidy Determination

Table IV-14 displays the bill subsidy type, the subsidy amount, and how the subsidy was calculated. The programs provide a variety of bill subsidy types, which include a percent discount, rate discount, a percentage of income, a fixed credit, a monthly subsidy, and an annual subsidy.

- Percent Discount: Under this method, the bill is discounted by a specified percentage, which may depend on household size and income. Five programs use the percent discount subsidy type with the discount ranging from eight percent to a maximum of 80 percent.
- Percentage of Income Program: Participants in this type of program pay a fixed amount equal to a specified percentage of the annual household income, where the percentage may vary based upon the household's poverty level. Sixteen programs use this subsidy type,

⁷Only programs with available information are included in the table.

but the percentage of income paid varies drastically. Participants pay as little as two percent of income up to 17 percent of income.

- Fixed Credit Program: Participants receive a credit each month so that the energy cost does not exceed a targeted energy burden, where the credit is based on household size, income, or usage. Two programs use this subsidy type.
- Monthly or Annual Subsidy: This type of program provides a credit to customers, where the subsidy may depend on energy burden. Two programs use this subsidy type.
- Rate Discount: The RAD rate discount program covers the full customer charge for distribution, the energy distribution charge, and a few surcharges. The RES rate discount program reduces the distribution charge and covers certain surcharges.

Percentage of income is the most common subsidy type, with 16 out of 27 programs using this subsidy type.

**Table IV-14
Program Bill Subsidy Determination**

State	Program Name	Subsidy Type				
		% Discount	% of Income	Annual/Monthly Credit	Fixed Credit	Rate Discount
CA	Energy Assistance Program Rate (EAPR) ¹	X	-	-	-	-
CO	Colorado Natural Gas Customer Assistance Program (CAP) ²	-	X	-	-	-
CO	SourceGas Percentage of Income Payment Plan (PIPP) ²	-	X	-	-	-
CO	Xcel Energy Affordability Program (EAP) ²	-	X	-	-	-
DC	Residential Aid Discount (RAD) ³	-	-	-	-	X
DC	Residential Essential Service (RES) ³	-	-	-	-	X
IL	Percentage of Income Payment Plan (PIPP) ²	-	X	-	-	-
KY	LG&E-KU Home Energy Assistance Program (HEA) ¹	-	-	-	X	-
MD	Electric Universal Services Program (EUSP) ⁴	-	-	X	-	-
ME	Central Maine Electric Lifeline Program (ELP) ²	-	X	-	-	-
MN	CenterPoint Energy Gas Affordability Program (GAP) ²	-	X	-	-	-
MN	Great Plains Natural Gas – Gas Affordability Program (GAP) ²	-	X	-	-	-
MN	IPL/MERC Gas Affordability Program (GAP) ²	-	X	-	-	-
MN	Xcel Energy Gas Affordability Program (GAP) ²	-	X	-	-	-
NH	Electric Assistance Program (EAP) ²	X	-	-	-	-
NJ	Universal Service Fund (USF) ⁵	-	X	-	-	-
NV	Fixed Annual Credit (FAC) ²	-	-	X	-	-
OH	Percentage of Income Payment Plan Plus (PIPP) ²	-	X	-	-	-
PA	Allegheny Low Income Payment & Usage Reduction Program (LIPURP) ¹	-	X	-	-	-
PA	Duquesne Light Customer Assistance Program (CAP) ¹	X	-	-	-	-

State	Program Name	Subsidy Type				
		% Discount	% of Income	Annual/Monthly Credit	Fixed Credit	Rate Discount
PA	FirstEnergy Pennsylvania Customer Assistance Program (PCAP) ¹		X	-	-	-
PA	NFG Low-Income Residential Assistance Program (LIRA) ¹	X	-	-	-	-
PA	PECO Customer Assistance Program (CAP) ¹	-	-	-	X	-
PA	People's Gas Customer Assistance Program (CAP) ¹	-	X	-	-	-
PA	PGW Customer Responsibility Program (CRP) ¹	-	X	-	-	-
PA	PPL OnTrack (CAP) ¹	X	-	-	-	-
PA	UGI Customer Assistance Program (CAP) ¹	-	X	-	-	-
Total		5	16	2	2	2

Sources: 1) APPRISE Evaluation Report 2) LIHEAP Clearinghouse: Ratepayer Funded Programs 3) DC Public Service Commission: Low-Income Discount Programs & Seniors and Disabled Residents Credit 4) EUSP. 2019. Annual Administrative Report 5) LIHEAP Clearinghouse: NJ State PBF/USF History, Legislation, Implementation.

Table IV-14B
Program Bill Subsidy Determination

State	Program Name	Amount	Subsidy Determination			
			HH Size	Income/Poverty Level	Usage	Other
CA	Energy Assistance Program Rate (EAPR) ¹	30-35% discount	X	X	X	-
CO	Colorado Natural Gas Customer Assistance Program (CAP) ²	2-3% of income	-	X	-	-
CO	SourceGas Percentage of Income Payment Plan (PIPP) ²	2-3% of income	-	X	-	-
CO	Xcel Energy Affordability Program (EAP) ²	3% of income	-	X	-	-
DC	Residential Aid Discount (RAD) ³	~30% discount	-	-	-	-
DC	Residential Essential Service (RES) ³	~25% discount	-	-	-	-
IL	Percentage of Income Payment Plan (PIPP) ²	6% of monthly income	-	X	-	-
KY	LG&E-KU Home Energy Assistance Program (HEA) ¹	\$200-\$1,000 annual subsidy	X	X	X	-
MD	Electric Universal Services Program (EUSP) ⁴	~\$506 annual benefit	-	-	-	-
ME	Central Maine Electric Lifeline Program (ELP) ²	4% - 10% of income	-	X	-	-
MN	CenterPoint Energy Gas Affordability Program (GAP) ²	6% of income	-	X	-	-
MN	Great Plains Natural Gas – Gas Affordability Program (GAP) ²	4% of income	-	X	-	-
MN	IPL/MERC Gas Affordability Program (GAP) ²	6% of income	-	X	-	-
MN	Xcel Energy Gas Affordability Program (GAP) ²	4% of income	-	X	-	-
NH	Electric Assistance Program (EAP) ²	8-77% discount	X	X	-	-
NJ	Universal Service Fund (USF) ⁵	3-6% of income	X	X	-	-
NV	Fixed Annual Credit (FAC) ²	~\$776 annual benefit	-	X	-	X

State	Program Name	Amount	Subsidy Determination			
			HH Size	Income/Poverty Level	Usage	Other
OH	Percentage of Income Payment Plan Plus (PIPP) ²	6-10% of monthly income	-	X	-	-
PA	Allegheny Low Income Payment & Usage Reduction Program (LIPURP) ¹	5-17% of monthly income	X	X	-	X
PA	Duquesne Light Customer Assistance Program (CAP) ¹	~22% discount	X	X	-	-
PA	FirstEnergy Pennsylvania Customer Assistance Program (PCAP) ¹	3-9% of income	X	X	X	X
PA	NFG Low-Income Residential Assistance Program (LIRA) ¹	10-80% monthly discount	X	X	-	-
PA	PECO Customer Assistance Program (CAP) ¹	\$0 - \$2,922 annual subsidy	X	X	X	-
PA	People's Gas Customer Assistance Program (CAP) ¹	8-10% of monthly income	X	X	-	-
PA	PGW Customer Responsibility Program (CRP) ¹	8-10% of monthly income	X	X	-	-
PA	PPL OnTrack (CAP) ¹	20-50% discount	X	X	-	-
PA	UGI Customer Assistance Program (CAP) ¹	7-9% of monthly income	-	X	-	-
Total		-	12	24	3	2

Sources: 1) APPRISE Evaluation Report 2) LIHEAP Clearinghouse: Ratepayer Funded Programs 3) DC Public Service Commission: Low-Income Discount Programs & Seniors and Disabled Residents Credit 4) EUSP. 2019. Annual Administrative Report 5) LIHEAP Clearinghouse: NJ State PBF/USF History, Legislation, Implementation.

J. Bill Subsidy Benefit Levels

Table IV-15 displays the mean subsidy level for the bill payment assistance programs. The subsidy amount ranges from \$40 to \$1,206 with a mean annual benefit of \$600. The table shows that several programs provide different subsidy amounts based on the household's heating type.

Table IV-15
Mean Subsidy Level

State	Program Name	Mean Subsidy Level (\$) ⁸
CA	Energy Assistance Program Rate (EAPR) ¹	\$343
DC	Residential Aid Discount (RAD) ²	\$272
DC	Residential Essential Service (RES) ³	\$72
KY	LG&E-KU Home Energy Assistance Program (HEA) ¹	LG&E: \$641 KU: \$391
MD	Electric Universal Services Program (EUSP) ⁴	\$650
ME	Central Maine Electric Lifeline Program (ELP) ¹	\$285
NV	Fixed Annual Credit (FAC) ⁵	\$776
OH	Percentage of Income Payment Plan Plus (PIPP) ¹	Elec Heat: \$1,206 Non-Elec Heat: \$689
PA	Allegheny Low Income Payment & Usage Reduction Program (LIPURP) ¹	\$201

⁸Only programs with available information are included in the table.