# ELECTRIC ASSISTANCE PROGRAM UTILITY PROCEDURES MANUAL

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# 1. Roles & Responsibilities

#### 1.1. Customer

- 1.1.1 Responsible for signing a contract with the Community Action Agency (CAA) acknowledging their role in the EAP.
- 1.1.2 Responsible for providing the CAA with total household income and household size in order for the CAA to determine level of tiered discount and with a copy of current electric bill to provide necessary electric account information.
- 1.1.3 Responsible for making timely payments to utilities for their electric bill.
- 1.1.4 Responsible for negotiating payment arrangements with utilities if they cannot pay their electric bill on time and in full in order to avoid disconnection for non-payment.
- 1.1.5 Responsible for engaging the CAA, as the contracting agency, as their primary point of contact regarding EAP related issues.
- 1.1.6 Responsible for notifying the CAA when there is a change in income and/or household size which would affect the customer's benefits.
- 1.1.7 Responsible for notifying CAA where there is a change in address.
- 1.1.8 Responsible for completing the re-certification process to maintain their benefits.

## 1.2. Program Administrator and CAA (Community Action Agency)

- 1.2.1 Responsible for establishing customer eligibility for EAP.
- 1.2.2 Responsible for educating the customer on how the EAP works and what the customer's role is having qualified for the program.
- 1.2.3 Responsible for certifying (signing-up) customers on the EAP and notifying the utility, via a "Certification Notification" transaction.
  - 1.2.3.1 Responsible for determining applicant's discounted benefit tier based on their total household income and household size.
  - 1.2.3.2 Responsible for assigning a universal permanent identifier for the primary customer of record for the utility bill and notifying utility with certification transaction.
- 1.2.4 Responsible for notifying the EAP participants when their EAP certification period expires.
- 1.2.5 Responsible for re-certifying the EAP participants at the end of their certification period and required to notify utility only if the customer is not re-certified or if the customer changes discount tiers.
- 1.2.6 Responsible for answering customer questions regarding the EAP, including discount benefit level.

#### 1.3. Utility

- 1.3.1 Responsible for processing customer specific enrollment and termination data received from the CAA.
  - 1.3.1.1 Responsible for contacting the CAA and resolving discrepancies with the certification and/or termination files.

- 1.3.1.2 Responsible for enrolling the customer in the EAP with the appropriate tiered discount level as determined by the CAA.
- 1.3.2 Responsible for transmitting, to the Program Administrator on a monthly basis customer specific billing and payment data used to monitor and evaluate the EAP.
- 1.3.3 Responsible for providing correct EAP customer billing.
- 1.3.4 Responsible for responding to customer's inquiries concerning payment amount due and other electric billing and payment related issues.
- 1.3.5 Responsible for terminating customers from the EAP only upon receipt of the CAA generated "Customer Removal Notification" transaction.
- 1.3.6 Responsible for the monthly reconciliation of Systems Benefit Charge collections net of program discounts applied, approved utility administrative costs and CAA administrative costs.
- 1.3.7 Responsible for marketing the EAP to their consumers.

# 2. Authorizing Participation

#### 2.1. Certification

- 2.1.1 The customer must apply for the EAP through one of the six state CAAs and be determined eligible in order to be certified for the EAP.
- 2.1.2 The local CAA will establish customer eligibility based on the customer meeting all of the following criteria:
  - 2.1.2.1 Total household income is less than or equal to 175% of the federal poverty guidelines.
  - 2.1.2.2 Applicant is the primary customer of record with the utility.
  - 2.1.2.3 The application is for the applicant's primary residence.
  - 2.1.2.4 The applicant is taking service under a residential rate.
- 2.1.3 The local CAA will have the customer sign a contract acknowledging the customer understands their responsibilities under the program.
- 2.1.4 The local CAA will determine the customer's tiered discount level using:
  - 2.1.4.1 The customer's annual total household income, as supplied by the customer;
  - 2.1.4.2 Household size;
  - 2.1.4.3 Table of "Discount Percents" approved by the Commission.
- 2.1.5 If the customer is eligible for the EAP, the local CAA will certify them as an EAP customer and notify the utility of their certification by sending a "Certification Notification" transaction. Included with the certification notification is the following:
  - 2.1.5.1 Level of tiered discount: 1-5
  - 2.1.5.2 Applicant's full name,
  - 2.1.5.3 Applicant's address of primary residence,
  - 2.1.5.4 Applicant's electric account number,
  - 2.1.5.5 Applicant's universal permanent identifier,

- 2.1.5.6 "Customer of record deceased" indicator
- 2.1.6 Upon processing the "Certification Notification" transaction, the utility will:
  - 2.1.6.1 Notify the CAA of any discrepancies in enrollment data and resolve with the CAA.
  - 2.1.6.2 Enroll the customer in the EAP with the appropriate discount tier on or before their next scheduled read cycle. If there are less than 2 days until the scheduled read cycle, the utility may enroll the customer in the EAP on the subsequent scheduled read cycle or earlier if possible.
  - 2.1.6.3 Update customer's electric account with universal identifier supplied by the CAA.
  - 2.1.6.4 Where the "customer of record deceased" indicator is yes, contact the customer regarding account name change.

#### 2.2. Customer Enrollment

- 2.2.1 The local CAA certifies that the customer is eligible for the EAP and relays that information to the utility via a "Certification Notification" transaction.
- 2.2.2 The utility updates the customer's electric account with the appropriate level of discount after processing a "Certification Notification" transaction issued by the CAA.
- 2.2.3 A valid "Certification Notification" will allow the utility to enroll a customer in the EAP when the customer is:
  - 2.2.3.1 An active residential customer taking service under a residential rate classification; and
  - 2.2.3.2 The primary customer of record for the account identified on the "Certification Notification".
    - 2.2.3.2.1 When the primary customer of record is deceased, the CAA will notify the utility in the "Certification Notification". The utility shall not reject the "Certification Notification" when the surviving spouse is identified on the "Certification Notification" but shall contact the applicant as described in 2.1.6.4.
- 2.2.4 The customer is enrolled, by the utility, on one of the following cycles depending on when the CAA's certification notice is received:
  - 2.2.4.1 If the notice is received with more than 2 days remaining before the customer's next scheduled meter read cycle then they will be enrolled no later than their next scheduled billing cycle.
  - 2.2.4.2 If the notice is received with less than 2 days remaining before the customer's next scheduled read cycle then they will be enrolled not on the next immediate cycle but on their subsequent scheduled read cycle, unless it is able to be processed sooner.
  - 2.2.4.3 If the utility can process the Program Administrator's electronic certification real time, without any need for a two day batch processing window, then enrollment will occur on the next read cycle.

2.2.5 If any of the data elements detailed in section 2.1.5 are missing or do not match the electric account, the utility will notify the appropriate CAA and resolve discrepancies.

#### 2.3. Customer Relocations and Termination of Service

- 2.3.1 Customers who terminate service with the utility, re-establish service with the same utility or another utility, and contact the CAA to re-establish their EAP participation within 30 days of originally terminating service will automatically be placed back on the discount rate.
- 2.3.2 Customers who terminate service with the utility and do not re-establish service with the same utility within 30 days or who move to the service territory of another utility must contact their local Community Action Agency to be reestablished on the discount tier.
  - 2.3.2.1 Re-establishment on the discount rate is dependent upon the availability of funds.
- 2.3.3 While it is the responsibility of the customer to contact their local CAA following a move and provide the information necessary to continue their EAP benefits, the utilities shall provide any "move" information known to them to the CAAs on a weekly or bi-weekly basis.

#### 2.4. Customer Re-certification

- 2.4.1 When a program participant re-certifies with the CAA and their discount tier changes, the CAA will send a Re-certification Notification to the utility.
- 2.4.2 If a program participant fails to re-certify before the certification period expires or is no longer eligible for the program, the CAA will send a "Removal Notification" transaction to the utility.

# 3. Billing

## 3.1. <u>Determination of Discount Levels</u>

- 3.1.1 Customers are assigned to one of five discount tiers according to total household income and household size.
- 3.1.2 The CAA, in its customer enrollment notice to the utility, will identify the tier to which the customer is to be assigned by designating a number 1-5.
- 3.1.3 Utilities will apply customer discounts based on the tier assignment authorized by the CAA.

#### 3.2. Application of Discount

3.2.1 Per NHPUC Order 24,664, the discount shall apply to all components of the distribution company bill excluding taxes.

## 3.2.1.1 Exceptions:

3.2.1.1.1 Ancillary Charges

- 3.2.1.1.1.1 Defined as any charge for which service cannot be disconnected for nonpayment.
- 3.2.1.1.1.2 The discount will not be applied to ancillary charges.
  - 3.2.1.1.1.3 Balances for ancillary charges should not be included when reporting current balances due.
- 3.2.1.1.2 Competitive Supply Charges
  - 3.2.1.1.2.1 Defined as any charges billed on behalf of or directly by a competitive electric supplier.
  - 3.2.1.1.2.2 The discount will not be applied to competitive supply charges appearing on the distribution company bill or billed directly by the competitive electric supplier.

#### 3.3. Deposits

- 3.3.1 Review of existing customer deposits.
  - 3.3.1.1 At the time a participant goes onto the EAP, the utility shall check to see if it holds a deposit from that customer and the reason why it obtained that deposit.
    - 3.3.1.1.1 Deposits obtained due to outstanding, undisputed prior balances shall be refunded to customers.
    - 3.3.1.1.2 Deposits obtained due to 4 consecutive disconnect notices, disconnection of service, or failure to provide satisfactory evidence of intent to remain at the location for which service is being requested for a period of 12 consecutive months shall be reviewed to ensure that the deposit amounts do not exceed the charge for 2 high use months. In determining the charge for 2 high use months, utilities shall reduce the charges for the 2 high use months by the amount of the discount the customer will be receiving on future bills.
      - 3.3.1.1.2.1 When the deposit exceeds the discounted amount of 2 high use months, the difference shall be refunded to the customer.
- 3.3.2 Deposits from the EAP customers.
  - 3.3.2.1 Deposits may be required from established EAP customers in accordance with the Commission's administrative rules, Puc 1200.
  - 3.3.2.2 When calculating the amount of the deposit, the utility shall reduce the amount of the high use bills by the amount of the discount when those bills were incurred prior to the customer's receipt of the EAP benefits.

#### 3.4. Rate Change from Residential to Commercial

3.4.1 The utility will notify the CAA when the customer changes from a residential rate to a commercial rate. The EAP customer switching to a commercial rate is no longer eligible for the EAP.

# 4. Removal from the Program

#### 4.1. Ineligibility

- 4.1.1 The utility shall remove the participant from the Program if the customer is no longer eligible upon recertification. The CAA will notify the utility to remove the participant.
- 4.1.2 The utility shall remove the participant from the Program at any time if the CAA determines the customer is no longer eligible and notifies the utility to remove the participant.

#### 4.2. Fraud

4.2.1 If fraud has been determined by the CAA, then the CAA will notify the utility to remove the participant from the Program.

#### 4.3. <u>Termination of Service</u>

4.3.1 If a participant terminates service at their current address and does not request service within 30 days within the utility's service territory, the utility can remove the participant from the program.

# 5. Administrative Cost Recovery

- 5.1 Utilities shall submit annual budgets no later than 60 days prior (no later than August 1) to the start of the program year, October 1. These budgets shall include the utility's allocated portion of the administrative costs of the Program Administrator.
- 5.2 The Commission shall approve the proposed budgets, subject to review at the end of the program year, for recovery during the program year.
- 5.3 Following the end of the program year, the Commission will conduct a prudency review of utility administrative costs and determine the appropriate level for utility recovery.
- 5.4 Approved monthly administrative costs shall be deducted from the SBC billed each month.

# 6. Program Funding

#### **6.1. System Benefits Charge (SBC)**

- 6.1.1 The System Benefits Charge is a Commission approved charge that is assessed to residential, commercial and industrial customers via a per kilowatt hour charge on the customer's bill, which is intended to collect funds for the purpose of financing the EAP and energy efficiency programs.
- 6.1.2 The utility is acting as agent in the collection of System Benefits Charges and all approved rules regarding the collection, accounting and reporting of SBC funds should continue as authorized.
- 6.1.3 The NH State Treasurer's Office is responsible for managing the EAP funds collected via the System Benefits Charge that are remitted to the Treasury by the utilities
- 6.1.4 The following utility EAP activities are to be funded by the SBC.

- 6.1.4.1 Approved utility EAP incremental start-up/development costs.
- 6.1.4.2 Utility on-going EAP approved administrative costs including the utility's allocation of the Program Administrator's administrative costs.
- 6.1.4.3 EAP discounts based on the tier discounts authorized by the Program Administrator and applied to customer accounts.

#### **6.2. Program Discounts**

- 6.2.1 The Program Administrator authorizes the utility to apply discounts based on the total household income and household size of the participants
- 6.2.2 The utility is responsible for developing a tracking and reporting process that will accurately report program discounts applied to the EAP accounts in any given month
- 6.2.4 The tracking and reporting month is to coincide with the revenue month (i.e. the completion of a month's cycle billing) and not the calendar month. It is also to be consistent with the month used to report System Benefit Charge billed.
- 6.2.5 EAP Discounts are to be netted against SBC funds billed before SBC funds are transferred to the NH State Treasurer.

#### **6.3.** Netting SBC Billings and EAP Discounts

6.3.1 At the close of each revenue month the utility will generate a report that displays 1) total System Benefits Charge billings, 2), interest paid on the reserve, 3) EAP Discounts applied, 4) ongoing administrative costs (including the utility's allocation of the Program Administrator's administrative costs). 5) the net of System Benefits Charge (SBC) billings and interest on the reserve balance and EAP discounts, administrative costs, and 7) the reserve balance.

#### **EXAMPLE**

For the Revenue Month of July 200X

•	System Benefit Charge Billings	\$ xxx
•	Plus: Interest paid on the reserve	+xx
•	Less: Program Discounts applied	- XX
•	Less: Administrative costs	- XX
•	Balance due/Balance owed	\$ xx

- 6.3.1.1 The <u>balance due</u> is the amount due to the NH State Treasury when System Benefits billings exceed the EAP credits applied and other program costs listed above.
- 6.3.1.2 The <u>Balance owed</u> is the amount due the utility from the NH State

  Treasury because System Benefit billings were less than the EAP credits applied and other program costs listed above.
- 6.3.2 This process is subject to audit and it is the responsibility of the utility to support the accumulated monthly EAP benefit activity in sufficient detail.

#### 6.4. Remitting Funds to Or Invoicing the State Treasury

- 6.4.1 When there is a balance due the NH State Treasury because System Benefits Charges billed were greater than the EAP benefits and the monthly administrative costs, the utility will electronically transfer the funds via an ACH or other form of electronic transfer acceptable to the NH State Treasury.
- 6.4.2 When there is a balance owed because the System Benefits Charges billed were less than the EAP benefits and the monthly administrative costs, the utility will generate an invoice to be processed as follows:
  - 6.4.2.1 The utility invoice will be submitted to the Commission. The Commission is responsible for reviewing, approving and submitting the invoice to the NH State Treasurer's office for payment.
- 6.4.3 No later than the 15<sup>th</sup> day of each month, the utility will either 1) transfer the balance due to the NH State Treasury and submit the report described in 6.3.1 to the Commission or 2) submit an invoice to the Commission for the balance owed the utility.
  - 6.4.3.1 It is the responsibility of the Commission to process the utility invoice and submit it to the Treasurer's office within 5 business days of the 15<sup>th</sup> of the month. The Treasurer's Office shall send payment to the utility within 5 business days of receiving the invoice from the Commission.

#### 7. Customer Communications

#### 7.1. Program Announcement Bill Inserts

7.1.1 It is the intent of the advisory board to have all utilities present the same message promoting the EAP to customers periodically as required.

#### 7.2. Program Marketing

- 7.2.1 It is recommended that utilities consider employing any number of the following marketing mediums in order to promote the EAP to customers over the course of any given year.
  - 7.2.1.1 Bill messages
  - 7.2.1.2 Bill inserts
  - 7.2.1.3 Web sites
  - 7.2.1.4 Integrated Voice Response system
  - 7.2.1.5 Customer/Member Service Representative
  - 7.2.1.6 Utility specific newsletters
  - 7.2.1.7 New customer/member packets / welcome packets
  - 7.2.1.8 Point of Purchase displays

# 8. Ongoing Required Reporting

#### **8.1. Daily**

- 8.1.1 The CAA will remit to the utilities the following enrollment data by customer.
  - 8.1.1.1 Full name
  - 8.1.1.2 Account Number
  - 8.1.1.3 Address
  - 8.1.1.4 CAA assigned universal permanent identifier
  - 8.1.1.5 Tier
- 8.1.2 Utilities will convey to the CAA any customers that cannot be enrolled due to enrollment data discrepancies.

#### 8.2. Monthly

- 8.2.1 Raw Data: Following the final monthly bill cycle and no later than the 15<sup>th</sup> day of the following month, the data identified below will be remitted by the utility to the Program Administrator.
  - 8.2.1.1 The dollar amount of each bill rendered for current service.
  - 8.2.1.2 The date on which each bill is rendered
  - 8.2.1.3 The total account balance at the time the bill for current service is rendered.
  - 8.2.1.4 The date on which each payment is posted.
  - 8.2.1.5 The dollar amount of each payment received on an account.
  - 8.2.1.6 The total account balance on the account resulting from posting the payment.
  - 8.2.1.7 The kWh of usage for each billing period.
  - 8.2.1.8 The discount level of the tier to which the customer is assigned.
  - 8.2.1.9 The customer account number.
  - 8.2.1.10 The customer's CAA assigned Universal Identifier.
- 8.2.2 <u>Fiscal Data</u>: The utilities will file, following the last cycle of the month, a reconciliation and/or bill or remittance of funds resulting from:
  - 8.2.2.1 Total dollars billed via the SBC
  - 8.2.2.2 Plus interest paid on the reserve
  - 8.2.2.3 Less: Discounts
  - 8.2.2.4 Less: Administrative expenses
  - 8.2.2.5 Less: Monthly utility allocation of the Program Administrator's administrative costs
- 8.2.3 <u>Program Data</u>: The utility will submit to the Commission a count of the number of active participants enrolled in the EAP broken out by tier.
- 8.2.4 <u>Aging Report</u>: The utility will submit to the Commission a report on aging comparisons between the EAP and other residential accounts.
- 8.2.5 <u>Reserve Fund Data</u>: The utility will submit to the Commission the balance of the portion of the reserve being held by the utility.
- 8.2.6 <u>Disconnection Data</u>: The utility shall submit to the Commission a report on disconnections and reconnections of service comparing EAP accounts to other residential accounts.

# **8.3. Annually:**

- 8.3.1 Utilities shall submit annual budgets no later than 60 days prior to the start of the program year.
- 8.3.2 Utilities shall submit annual SBC projections and kWh sales forecast, broken down by month, to the Commission prior to the start of the next program year.