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May 20, 2024

Oregon Public Utility Commission
Attn: Filing Center
201 High Street S.E., Suite 100
Salem, OR 97301-3398

**Re: Advice No. O24-05-01 Housekeeping
Schedule 32, Oregon Low-Income Bill Pay Assistance and Schedule 36, Energy Discount Program**

Cascade Natural Gas Corporation (Cascade or Company) submits to the Oregon Public Utility Commission (Commission) the following revisions to its Tariff P.U.C. OR. No. 10, stated to become effective with service on and after July 24, 2024:

- Sixth Revision of Sheet No. ii
- First Revision of Sheet No. 32.1
- Third Revision of Sheet No. 32.2
- First Revision of Sheet No. 36.1
- First Revision of Sheet No. 36.2

The purpose of this filing is to correct language in Schedule 32, Oregon Low-Income Bill Assistance Program (OLIBA) so that the schedule reflects the programmatic changes that went into effect with the implementation of the Company's Energy Discount Program (EDP). In addition, this filing reformats Schedule 36, Energy Discount Program to conform with the rest of the Company's tariff. A description of each change by schedule is provided below:

Schedule 32, Oregon Low-Income Bill Assistance Program

In general, Schedule 32 is updated to reflect the changes to OLIBA that were put into effect when EDP was implemented on October 1, 2022. Prior to EDP, OLIBA was administered solely by Community Action Agencies (Agencies). Agencies and the Company both administer OLIBA now. Also, prior to EDP, OLIBA offered bill assistance grants; now, OLIBA offers arrearage relief, because EDP is the Company's provision of ongoing bill assistance. Specific revisions to Schedule 32 are listed below:

Sheet No. 32.1 is revised in the following ways:

- The program name is corrected from Oregon Low-Income Assistance to Oregon Low-Income Bill Assistance or OLIBA. The Company's program has historically been referred to as OLIBA and continues to be referred to as OLIBA. The index is also updated accordingly.
- The purpose statement is updated to clarify that OLIBA grants are applicable to past due balances rather than ongoing bill payment assistance. EDP bill discounts provide ongoing assistance for qualifying customers and OLIBA resources are dedicated for arrearage relief.
- Four new sections are added: Applicable, Low-Income Definition, Grants, and Program Administration. The verbiage under these sections contains no new or revised program parameters. Instead the revisions transparently put forth the program as it is currently offered per the guidance of the Company's Low-Income Advisory Group.
 - The Applicable section clarifies that service on Schedule 32 is available to qualifying low-income customers receiving gas service on Schedule 101, General Residential Service Rate.
 - The Low-Income Definition section establishes the qualifying standard for a household income for customers to receive service in the OLIBA program.
 - The Grants section provides the grant amounts offered for each tier of income eligibility. This information is currently not found in Schedule 32 but is stated in the Company's service agreements with the Agencies. The transparency of providing this information in the tariff schedule should be useful to customers wanting to understand available benefits.
 - The Program Administration section explains that a customer may apply for OLIBA by calling the Company or one of the listed Agencies. Schedule 32 currently limits administrative duties to Agencies, which was accurate prior to the implementation of EDP.

Sheet 32.2 is revised in the following manner:

- Information currently in the Special Terms and Condition is reorganized under four new headings: Income Verification, Agency Administration Fees, Program Funding and Reporting.
 - The verbiage under the new Income Verification header clarifies that Community Action Agencies will perform income verification using Low Income Home Energy Assistance Program (LIHEAP) standards for income documentation, but in no instance, will the customer need to demonstrate citizenship or provide the names of household residents.
 - Language under the Agency Administrative Fees sections is corrected to state the administrative fee paid to Agencies is simply twenty percent of the grant total; it is never less or more.
 - The information about program funding and reporting is separated under two distinct headings, Program Funding and Reporting.

Schedule 36, Energy Discount Program

Schedule 36, as currently approved, presents all the program parameters under the header of Terms and Conditions. The content is reorganized and divided with section headers such as Purpose, Applicability, etc., which is better aligned with the formatting of the Company's other tariff schedules.

Beyond reformatting the existing information, three substantive changes are proposed in Schedule 36. The first is that the language under the newly titled Income Verification section is revised to include softer, more customer friendly word choices. The terminology "income verification" replaces "audit."

The second change is to General Terms and Conditions No. 2, which states that EDP service will transfer to a customer's new account should the customer reinstate their service in a timely manner. The current Schedule 36 specifies that this option is available if the customer transfers to a new account within fifteen days. With this filing, this is changed to twenty days, which is aligned with the changes to the customer definition found in OAR 860-021-0008(3) and adopted September 30, 2022.

The third substantive change to Schedule 36 is to the reporting requirement, which is now under the heading, Reporting. The Company's original Sheet No. 36.2, filed in Advice No. O22-06-01 docketed as ADV-1409, included the requirement for an annual report. Staff's Report, dated July 19, 2022, stated that the Company would provide quarterly reporting, which it does under Docket RG-101. Cascade discussed this duplicative reporting requirement with Commission Staff, who told the Company that quarterly reporting is sufficient. As such, the annual reporting requirement is removed and replaced with the quarterly reporting requirements established in Staff's Report, dated July 19, 2022, in Docket ADV-1409.

General

The Company submits a version of its approved schedules with its proposed changes in redlined text as a courtesy.

The Company's Low-income Advisory Group has reviewed this filing and has no issues or concerns with its content.

If you have any questions regarding this filing, please contact Jennifer Gross at jennifer.gross@cngc.com.

Sincerely,

/s/ Lori Blattner

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**SCHEDULE 32
OREGON LOW-INCOME BILL ASSISTANCE PROGRAM (OLIBA)**

(T)

PURPOSE

This schedule establishes the program parameters for providing grants to be applied towards the past due balances of qualifying low-income residential customers.

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(D)

APPLICABLE

This schedule applies to residential customers or household members of a dwelling served on Schedule 101, General Residential Service Rate, who have self-declared their household is low income.

(N)

LOW-INCOME DEFINITION

A customer is considered low-income if their gross cumulative household income is less than or equal to 150% Federal Poverty Level (FPL) or less than or equal to 60% State Median Income (SMI) for the number of residents living in the household.

GRANTS

Four tiers of grants are offered based on the customer’s FPL or SMI, whichever is more advantageous to the customer. A qualifying customer may receive a cashless voucher for the percentage of their past due amount as established in the tier for which they qualify:

Tier	Income Level	Arrearage Paid
T1	0-25% FPL, 0-15% SMI	90%
T2	26-50% FPL, 16-30% SMI	86%
T3	51-100% FPL, 31-45% SMI	83%
T4	101-150% FPL, 46-60% SMI	80%

PROGRAM ADMINISTRATION

OLIBA is administered by the Company and the Community Action agencies (Agencies) listed in the table below that also administer Low Income Home Energy Assistance Program (LIHEAP) and have executed service agreements for low-income bill pay assistance program delivery with the Company.

AGENCIES
Community Connection of NE Oregon (CCNO)
NeighborImpact (NIMPACT)
Klamath Lake Community Action Services (KLCAS)
Community in Action (CINA)
Community Action Program of East Central Oregon (CAPECO)

(N)

(continued)

SCHEDULE 32
OREGON LOW-INCOME BILL ASSISTANCE PROGRAM (OLIBA)

(T)

INCOME VERIFICATION

The Agencies shall perform any income verification which will generally follow the established protocols for verifying income for LIHEAP except that citizenship and a name per each household member shall not be required.

(N)

(T)

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(T)

AGENCY ADMINISTRATIVE FEES

Each Agency will be reimbursed 20 percent of the total low-income bill payment assistance funds applied to customers' utility accounts.

(N)

(T)

(T)

PROGRAM FUNDING

Program funding is provided per Schedule 31, Public Purpose Charge. Any amounts not disbursed in the program year will carry over to the next program year.

(N)

(T)

(T)

REPORTING

The Company will provide an annual summary evaluation report on the progress of the program for review by the Commission by December 1 following the end of each program year.

(N)

(T)

(T)

**SCHEDULE 36
ENERGY DISCOUNT PROGRAM**

PURPOSE

The purpose of this schedule is to define the mechanism for providing low-income billing assistance to qualifying residential customers under the Company's Energy Discount Program (EDP).

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(K)(T)
(T)

APPLICABILITY

This schedule is for qualifying residential customers served on Schedule 101 or household members of a dwelling served on Schedule 101. An applicant for service under this schedule must demonstrate their household income is less than or equal to 150% of the Federal Poverty Level (FPL) or less than or equal to 60% Oregon State Median Income (SMI). Qualifications under EDP.

(N)

ENERGY DISCOUNT PROGRAM TIERS

Customers enrolled in EDP will have their monthly natural gas bill discounted by the percentage as listed in the table below for the tier that corresponds with their percentage of FPL or SMI for their household.

(M)
(T)

Tier	Tier Levels	Energy Discount
1	0-25% FPL, 0-15% SMI	95%
2	26-50% FPL, 16-30% SMI	70%
3	51-100% FPL, 31-45% SMI	45%
4	101-150% FPL, 46-60% SMI	15%

(M)
(T)
(M)
(T)(M)

PROGRAM ENROLLMENT

Customers may enroll in EDP by calling Cascade's customer service number at (888) 522-1130 (Monday - Friday, 7:30 A.M. - 6:30 P.M.) or completing an online application found on cngc.com. Customers may also apply for EDP energy assistance by calling a local Community Action Agency (Agency). The customer will verbally provide their monthly income and the number of household residents to enroll in the EDP within the qualifying tier.

(N)

(T)
(T)

INCOME VERIFICATION

Customers who qualify for service under this schedule by self-declaring their income may be subject to a post-enrollment income verification. Cascade may choose to income verify up to three (3) percent of customers who qualified for service on this schedule by self-declaring their income. Customers found to be ineligible for the rate discount they are receiving will be prospectively removed from the program or adjusted to the correct tier.

(N)
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(T)

(continued)

(K) Refers to language previously on Sheet 36.1 that is now on Sheet 36.2

(M) Refers to content previously found on Sheet 36.2.

(N)
(N)

**SCHEDULE 36
ENERGY DISCOUNT PROGRAM**

(N)
(N)(K)

PROGRAM ADMINISTRATION

EDP is administered by the Company and by Agencies that have executed a contract with Cascade establishing roles and responsibilities consistent with this Schedule. Failure to comply with requirements in the contract may result in the Agency's termination from the role of program administrator.

(N)
(T)
(T)

TERM

A qualifying customer is enrolled in EDP for twenty-four (24) months. The twenty-four-month term restarts upon any application of LIHEAP, OLIBA, or Winter Help.

(N)
(T)
(T)

PROGRAM YEAR

The annual program year begins October 1.

(N)
(M)

PROGRAM FUNDING

Program costs incurred for this program and outreach will be recovered through tariff rates presented on Schedule 37, Low-Income Assistance Cost Recovery.

LOW-INCOME ADVISORY GROUP

A low-income advisory group comprised of key stakeholders, including but not limited to, Company, Oregon Public Utilities Commission, Oregon Citizens' Utility Board, and Agency representatives shall discuss and advise Cascade on program related matters such as the evaluation, program specifics, performance obligations, regulatory filings, rate impacts, and program outreach efforts. This advisory group will meet at least twice annually.

(T)
(T)

GENERAL TERMS AND CONDITIONS

1. A customer who is enrolled in EDP and who moves or re-establishes service within the Company's service territory within twenty (20) business days may have the program transferred to the new account for the service address.
2. Customers who qualify for LIHEAP, OLIBA, or Winter Help will be auto-enrolled in EDP based on their qualifying income percentage eligibility.
3. Service under this schedule is subject to the rules and regulations contained in the Company's tariff.

(T)(M)
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(M)
(N)

REPORTING

The Company will file with the Commission quarterly reports on its EDP performance that will provide the following information:

1. Total number of customers enrolled in the program by month, and zip
2. Total dollars provided to customers, by discount tier, month, and zip
3. Average discount provided to customers, by discount tier, month, and zip
4. Dollars spent on administrative costs, by descriptive cost category
5. Total enrollments by Cascade
6. Total enrollments by Agency

(C)
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(C)

(K) Refers to language previously on Sheet 36.2 that is now on Sheet 36.1

(N)

(M) Refers to content previously found on Sheet 36.2.

(N)

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SCHEDULE 32
OREGON LOW-INCOME BILL ASSISTANCE PROGRAM (OLIBA)

PURPOSE

~~The purpose of this provision is to define the mechanism~~ This schedule establishes the program parameters for providing low income bill assistance funding grants to be applied towards the past due balances of ~~to the independent entities delivering the program and to define the process through which those funds will be allocated to the various entities providing services to qualifying~~ low-income residential customers, within Cascade Natural Gas's service territory in Oregon. ~~This tariff schedule works in conjunction with Schedule 31 and Schedule 33.~~

APPLICABLE

This schedule applies to residential customers or household members of a dwelling served on Schedule 101, General Residential Service Rate, who have self-declared their household is low income.

LOW-INCOME DEFINITION

A customer is considered low-income if their gross cumulative household income is less than or equal to 150% Federal Poverty Level (FPL) or less than or equal to 60% State Median Income (SMI) for the number of residents living in the household.

GRANTS

Four tiers of grants are offered based on the customer's FPL or SMI, whichever is more advantageous to the customer. A qualifying customer may receive a cashless voucher for the percentage of their past due amount as established in the tier for which they qualify:

<u>Tier</u>	<u>Income Level</u>	<u>Arrearage Paid</u>
<u>T1</u>	<u>0-25% FPL, 0-15% SMI</u>	<u>90%</u>
<u>T2</u>	<u>26-50% FPL, 16-30% SMI</u>	<u>86%</u>
<u>T3</u>	<u>51-100% FPL, 31-45% SMI</u>	<u>83%</u>
<u>T4</u>	<u>101-150% FPL, 46-60% SMI</u>	<u>80%</u>

PROGRAM ADMINISTRATION

OLIBA is administered by the Company and the Community Action agencies (Agencies) listed in the table below that also administer Low Income Home Energy Assistance Program (LIHEAP) and have executed service agreements for low-income bill pay assistance program delivery with the Company.

AGENCIES
<u>Community Connection of NE Oregon (CCNO)</u>
<u>NeighborImpact (NIMPACT)</u>
<u>Klamath Lake Community Action Services (KLCAS)</u>
<u>Community in Action (CINA)</u>
<u>Community Action Program of East Central Oregon (CAPECO)</u>

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(continued)

SCHEDULE 32
OREGON LOW-INCOME BILL ASSISTANCE PROGRAM (OLIBA)

GENERAL TERMS AND CONDITION

~~The monies provided by the public purpose funding, defined in Schedule 31, will be transferred to an internal program account and dispersed to Community Action Agencies (Agencies) for the purpose of adding or expanding low income bill assistance and weatherization programs on a monthly basis.~~

INCOME VERIFICATION

~~Each Agency~~The Agencies shall perform any income verification which will generally follow the established protocols for verifying income for LIHEAP except that citizenship and a name per each household member shall not be required. for the qualification of and disbursement to eligible participants in accordance with the guidelines promulgated by OHCS and the Low Income Energy Assistance Act of 1981 and subsequent amendments, as outlined in the OHCS Omnibus Contract.

SPECIAL TERMS AND CONDITIONS

- ~~1. In order to participate in the program, an Agency must be a legal entity, contracting or subcontracting with the State of Oregon, Department of Housing and Community Services (OHCS), which is eligible to administer funding under the Federal Low Income Home Energy Assistance Program (LIHEAP).~~
- ~~2. All funds allocated to the Agencies will be distributed only to income-eligible residential customers of Cascade Natural Gas. Fund distribution will be accomplished using a cashless voucher system. The cashless voucher system will allow the transfer of authorized payments to an individual customer's utility account from the Oregon Low Income Bill Assistance program account based on an electronic voucher list submitted to the company by each participating Agency. The company will process the voucher as soon as possible following receipt of the voucher list. In the event the Company receives a voucher authorization for a single customer from two or more Agencies, the Company will process only one voucher authorization.~~
- ~~3. The company will determine the allocation of bill assistance funds to the participating Agencies at the beginning of each program year based on the same allocation used by OHCS to allocate funds under LIHEAP during the previous program year, except that the finds may be reallocated at any time during the program year, if the company, at its sole discretion, determines that such a re-allocation is the most effective and efficient use of the available funds.~~

This tariff schedule works in conjunction with Schedule 31 and Schedule 33.

(continued)

RULE 32**OREGON LOW-INCOME ASSISTANCE PROGRAM****SPECIAL TERMS AND CONDITIONS (continued)**

~~4. Each participating Agency will have sole responsibility to screen and approve applicants for eligibility. Each Agency shall follow the established protocols for the qualification of and disbursement to eligible participants in accordance with the guidelines promulgated by OHCS and the Low-Income Energy Assistance Act of 1981 and subsequent amendments, as outlined in the OHCS Omnibus Contract. The amount of assistance for eligible participants shall be based on the LIHEAP/OEA Poverty Guidelines and Payment Matrix from the OHCS/OEA Manual for these programs. Any voucher authorization received by the Company that exceeds these guidelines will be appropriately adjusted. If a customer has a credit balance due to the receipt of low-income assistance and the customer's service is disconnected, the credit balance will be redirected to the Agency's allocation fund for distribution to other clients.~~

AGENCY ADMINISTRATIVE FEES

~~Each Agency will be reimbursed from the Oregon Low Income Bill Assistance Program account for certain administrative costs and direct program costs incurred by them in the administration and delivery of the program to Cascade's customers. Total program administration and delivery costs shall not exceed 20 percent of the total low-income bill payment assistance funds applied to customers' utility accounts. Should actual administrative and program delivery costs be lower than the 20 percent, the remaining funds shall be allocated into the program fund to support direct services.~~

~~5. Each Agency will provide a summary report providing information on the prior month's program activities. The report must identify the number of families assisted and their location, as well as the amount of funds dispersed. The Company must receive all reports by the 20th business day of each month.~~

PROGRAM FUNDING

~~The Bill Payment Program year will extend from October 1 through September 30. Program funding is provided per Schedule 31, Public Purpose Charge. Any amounts not disbursed in the program year will carry over to the next program year. The Company will provide an annual summary evaluation report on the progress of the program for review by the Commission by December 1 following the end of each program year.~~

REPORTING

~~Each Agency will provide a summary report providing information on the prior month's program activities. The report must identify the number of families assisted and their location, as well as the amount of funds dispersed. The Company must receive all reports by the 20th business day of each month. The Company will provide an annual summary evaluation report on the progress of the program for review by the Commission by December 1 following the end of each program year.~~

**SCHEDULE 36
ENERGY DISCOUNT PROGRAM**

TERMS AND CONDITIONS PURPOSE

~~The program is effective on and after October 1, 2022.~~

The purpose of this schedule is to define the mechanism for providing low-income billing assistance to qualifying residential customers under the Company's Energy Discount Program (EDP).

APPLICABILITY

This schedule is for qualifying residential customers served on Schedule 101 or household members of a dwelling served on Schedule 101. An applicant for service under this schedule must demonstrate their household income is less than or equal to 150% of the Federal Poverty Level (FPL) or less than or equal to 60% Oregon State Median Income (SMI). Qualifications under EDP:

ENERGY DISCOUNT PROGRAM TIERS

Customers enrolled in EDP will have their monthly natural gas bill discounted by the percentage as listed in the table below for the tier that corresponds with their percentage of FPL or SMI for their household.

Income qualified customers under EDP will receive the following monthly energy discounts:

<u>Tier Levels</u>	<u>Energy Discount</u>
<u>0-25% FPL, 0-15% SMI</u>	<u>95%</u>
<u>26-50% FPL, 16-30% SMI</u>	<u>70%</u>
<u>51-100% FPL, 31-45% SMI</u>	<u>45%</u>
<u>101-150% FPL, 46-60% SMI</u>	<u>15%</u>

PROGRAM ENROLLMENT

~~1. Customers enrolled in EDP, based on their qualifying household income and household size, will have their monthly natural gas bill discounted by the percentage of their qualifying income percentage tier listed below.~~

Customers may enroll in EDP by calling Cascade's customer service number at (888) 522-1130 (Monday - Friday, 7:30 A.M. - 6:30 P.M.) or completing an online application found on cngc.com. Customers may also apply for EDP energy assistance ~~by scheduling an appointment with~~ by calling a local Community Action Agency (CAA Agency). ~~The customer will verbally provide their monthly income and the number of household size residents will be provided verbally by the customer and the customer will be automatically to~~ enroll in the EDP within the qualifying tier.

INCOME VERIFICATION

Customers who qualify for service under this schedule by self-declaring their income may ~~are not income verified will~~ be subject to a post-enrollment audit income verification. Cascade ~~will~~ may ~~audit~~ choose to income verify up to three (3) percent of non-income verified ~~customers who qualified for service on this schedule by self-declaring their income.~~ Customers found to be ineligible for the

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rate discount they are receiving will be prospectively removed from the program or adjusted to the correct tier.

(continued)

SCHEDULE 36
ENERGY DISCOUNT PROGRAM

PROGRAM ADMINISTRATION

~~2. —~~

~~EDP is administered by the Company and by The CAA Agencies that have executed will execute a contract with Cascade establishing roles and responsibilities consistent with this Schedule. Failure to comply with requirements in the contract may result in the Agency's termination from the role of program administrator.~~

TERM

~~3. — A qualifying customer is enrolled in EDP for twenty-four (24) months. The twenty-four-month term restarts upon any Customers enrolled in EDP must reapply two years after the date of their most recent enrollment. Any annual application of LIHEAP, OLIBA, or Winter Help will reset the enrollment application reapply deadline.~~

PROGRAM YEAR

~~The annual program year begins October 1.~~

- ~~4. — A customer who is enrolled in EDP and who moves or re-establishes service within the Company's service territory within fifteen (15) business days, may have the program transferred to the new account for the service address.~~
- ~~5. — Customers who qualify for LIHEAP, OLIBA, or Winter Help will be auto-enrolled in EDP based on their qualifying income percentage eligibility.~~
- ~~6. — At implementation, all low-income customers who have received energy assistance in the last twelve months will be auto-enrolled into the EDP. If the customer's qualifying income percentage is known, then they will be placed in the appropriate energy discount tier level. If the customer's income percentage is not known, then the customer will be placed in the lowest energy discount tier level at 101-150% FPL or 46-60% SMI.~~

~~— The annual program year begins October 1. Service under this schedule is subject to the rules and regulations contained in the Company's tariff.~~

~~(continued)~~

SCHEDULE 36

ENERGY DISCOUNT PROGRAM

ENERGY DISCOUNT PROGRAM TIERS

~~Income-qualified customers under EDP will receive the following monthly energy discounts:~~

Tier Levels	Energy Discount
0-25% FPL, 0-15% SMI	95%
26-50% FPL, 16-30% SMI	70%
51-100% FPL, 31-45% SMI	45%
101-150% FPL, 46-60% SMI	15%

PROGRAM FUNDING

Program costs incurred for this program and outreach will be recovered through tariff rates presented on Schedule 37, Low-Income Assistance Cost Recovery.

LOW-INCOME ADVISORY GROUP

A low-income advisory group comprised of key stakeholders, including but not limited to, Company, Oregon Public Utilities Commission, Oregon Citizens' Utility Board, and ~~CAA~~ Agency representatives shall discuss and advise Cascade on program related matters such as the evaluation, program specifics, performance obligations, regulatory filings, rate impacts, and program outreach efforts. This advisory group will meet at least twice annually.

REPORTING

~~By January 31 of each year, the Company will file with the Commission an annual report on its EDP performance that will detail total customers enrolled, customers' average therm usage, total dollars spent, grant dollars awarded to customers, number of households served per CAA, and program dollars spent on outreach and administration that is done by Cascade, CBOs, or CAAs. After the first year, the report will include a comparison of the program's performance to prior years.~~

GENERAL TERMS AND CONDITIONS

1. A customer who is enrolled in EDP and who moves or re-establishes service within the Company's service territory within twenty (20) business days may have the program transferred to the new account for the service address.
2. Customers who qualify for LIHEAP, OLIBA, or Winter Help will be auto-enrolled in EDP based on their qualifying income percentage eligibility.

3. Service under this schedule is subject to the rules and regulations contained in the Company's tariff.

REPORTING

By January 31 of each year, the Company will file with the Commission quarterly reports an annual report on its EDP performance that will provide the following information: ~~detail total customers enrolled, customers' average therm usage, total dollars spent, grant dollars awarded to customers, number of households served per CAA, and program dollars spent on outreach and administration that is done by Cascade, CBOs, or CAAs. After the first year, the report will include a comparison of the program's performance to prior years.~~

1. Total number of customers enrolled in the program by month, and zip
2. Total dollars provided to customers, by discount tier, month, and zip
3. Average discount provided to customers, by discount tier, month, and zip
4. Dollars spent on administrative costs, by descriptive cost category
5. Total enrollments by Cascade
6. Total enrollments by Agency