

2021 Draft State Plan Advisory Committee Meeting Feedback
Tuesday, July 28, 2020

Speaker	Section / Subsection	Comment Summary - Full Recording of the meeting is available on the CSD Public Website	CSD Responses
<p><u>Gilda Arreguin</u> Fresno County</p>	<p>1. Program Components</p>	<p>1. I just had a quick question to get a verification on slide number 18. Are you able to show it so that I could just see it again? I wanted to make sure that the duration dates that you provided from October 2020 to September of next year, if those are the actual dates. There it is. So, basically, the duration of this contract is ending in 2021, not in December 2021, correct? It's going to be a 12-month period contract.</p> <p>Will that be the benchmark for CSD LIHEAP providers to be at the 99%?</p>	<p>Similar to our program now, the 2021 funds will be available through June 30th, 2022. October 1st to September 30th is the Federal Fiscal Year, and The State Plan requires us to use the federal fiscal year, but then we make a note that the funds will be available November 1st, 2020 through June 30th, 2022. The contract will say that the 99% benchmark needs to be achieved by December 31st. CSD intends to delay the start of the 2021 LIHEAP in order to ensure we allow adequate time for the LSPs to review the draft contract language and provisions and provide feedback. This additional time will allow CSD time to review comments, make any changes to the contract and send the contract out for execution, prior to the contract start date. This change will ensure that the LSPs have the full contract term to provide benefits to clients.</p>
<p><u>Scott Berg</u> SHHIP</p>	<p>1. Program Components 1.2 Estimated Funding Allocation</p>	<p>2. SHHIP recommends the cooling season start on May 1.</p>	<p>The methodology for determining the cooling season was recommended by APPRISE, the technical consultant for the U.S. Department of Health and Human Services. Upon review, CSD determined the methodology provides a sound and consistent measure for quantifying the percentage of households assisted during the cooling season. Note: CSD limited the analysis to electric assisted households based on electricity being the prominent fuel source for cooling in California. However, CSD will review the current data submitted and consult with APPRISE to ensure we are reporting the cooling season appropriately.</p>

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<u>Laura Glass</u> Contra Costa	1. Program Components 1.2 Estimated Funding Allocation	3. In the attachment, Section 1, the Program Components, the cooling season starts July 1. However, in many parts of this state, our county included, we need cooling starting around May 1st. So, I would really urge you to take a look at that and back it up to May 1st.	See response in question 2 above.
<u>Nichole Smith</u> GNS	1. Program Components 1.2 Estimated Funding Allocation	4. Can you go into details about what different services the definition of the Cooling Season affects?	We included the cooling season in the State Plan because HHS wanted CSD to be able to report on the percentage of funds that are available for our cooling season. We analyzed our data, which indicated that most of the electric payments were being issued toward electric companies between July 1st and October 31st. We can certainly take a look at our data again to see if there has been an increase in the electric bills that we are paying earlier in the season. That is the basis of how we determined the percentage of funds that we spend during a cooling season. To clarify, it does not have anything to do with the benefit amounts.
<u>Val Martinez</u> Redwood CAA	1. Program Components 1.2 Estimated Funding Allocation	5. Climate change has had an impact on the advent of the cooling season and we are seeing triple digit bills earlier each year. I recommend that CSD consult the LSPs in the central valley and other areas of the state.	See response in question 2 above.

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<p><u>Val Martinez</u> Redwood CAA</p>	<p>1. Program Components 1.2 Estimated Funding Allocation</p>	<p>6. I strongly agree with Laura's recommendation that you push back the cooling period to May 1st. With climate change, we are seeing increasingly hot temperatures at a much earlier part of the year. I grew up in the Central Valley and I remember that May was the beginning of the cooling season, cause it got really hot. And I think you should be recognizing that. Maybe consult with somebody who lives in the Central Valey and other parts of the state, where they can give you some guidance on when it starts getting hot.</p>	<p>See response in question 2 above.</p>
<p><u>Val Martinez</u> Redwood CAA</p>	<p>1. Program Components 1.2 Estimated Funding Allocation</p>	<p>7. If you are relying only on electric bill payments, what about the bundled services that include cooling?</p>	<p>In case of bills that include both electric and gas services, the customer will indicate on the bill and will notate "electric."</p>

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<p><u>Nichole Smith</u> GNS</p>	<p>2. Heating Assistance 2.6 Benefit Levels</p>	<p>8. We believe that CSD is undervaluing the Average Energy Cost in counties where Natural Gas is not available by not taking other fuel types into consideration. When natural gas is not available most clients use an alternative fuel type other than electricity and those energy costs are not taken into consideration when calculating the base benefit levels. Additionally, while CSD uses weighted averages to calculate a county's average energy costs, weighted averages are not being used to calculate the average state monthly energy costs, which affects a County's coefficient and thus their base benefit levels. Without having the full data set available it's hard to tell what impact it is having, but we believe it may be negatively impacting smaller, rural areas.</p>	<p>CSD's utility assistance program consists of financial assistance to eligible low-income households to offset electric, natural gas or wood, propane and oil (WPO) energy costs. While CSD does conduct a rate survey of electric and natural gas residential costs with state utility companies, the results of this survey are not used to determine WPO benefits levels. Because WPO fuel sources are non-regulated and generally more expensive than electric and natural gas, WPO benefits levels are determined locally and capped at a maximum of \$1,000. Additionally, CSD has formed a WPO workgroup to advise on the best approach to determining benefit levels for WPO in the future.</p>
<p><u>Charlaine Mazzei</u> Del Norte Senior Center</p>	<p>2. Heating Assistance 2.6 Benefit Levels</p>	<p>9. We continue to object to calculating individual benefit amounts only using household size and income without taking into account the individual household energy burden or the presence of vulnerable populations. There are models for benefit calculation that would allow smaller households with some vulnerable populations to receive increased benefits based on need. We don't feel that using statewide or even county averages sufficiently addresses the issue of vulnerable populations on fixed income, who have a greater energy burdens than larger households who have a lower energy burden.</p>	<p>The benefit levels were based on data collected in 2019. When we collect the utility rate survey data next year, the rates might show an increase, but that data will be used to determine the benefit levels for the 2022 program. Please note that multiple programs are available to agencies concurrently. Besides LIHEAP, they may use Disbursement Assistance Program (DAP) or CARES Act Program (CAP) funding to provide an additional benefit, if needed, to resolve past due amounts to prevent a disconnection or restore services.</p>

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<u>Celia Andrade</u> PACE	2. Heating Assistance 2.6 Benefit Levels	10. I support the comments earlier about recalculating the income, burden, considering a lot of the families, especially in low-income households, are staying home. Therefore, the utility bill payments are projected to rise, probably double than they used to have prior to this COVID situation. I think the recalculation should consider this factor in the eligibility guidelines.	See response to question 9 above.
<u>Val Martinez</u> Redwood CAA	2. Heating Assistance 2.6 Benefit Levels	11. Why did CSD lower the payment amounts when we are seeing increasingly large bills due to the moratorium on shut-offs? Isn't it the second year in row that CSD has lowered the payments?	See response to question 9 above.
<u>Charlaine Mazzei</u> Del Norte Senior Center	2. Heating Assistance 2.6 Benefit Levels	12. Have you ever compared the average statewide and county coefficient calculations that give you energy cost and energy burden to the actual information that is being recorded by the LSPs?	We have not done a comparison. We are supportive of reevaluating the process for next year's program. The utilities currently provide data for all residential customers in the utility rate survey; however, we can ask them if they are able to provide data on just the low income customers for future rate surveys. CSD is uncertain whether taking into consideration the monthly energy costs of the low-income population will result in increased benefits, but is willing to look into it.
<u>Eugene Ayuyao</u> SC Edison	2. Heating Assistance 2.6 Maximum Benefit	13. HEAP Water, Propaine and Oil has a max of \$1,000. Is it the same for GAs and Electric?	The maximum benefit for gas and electric payments is also \$1,000, or the total amount due, whichever is less.

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<p><u>Nicole Mihld</u> City of Colton</p>	<p>2. Heating Assistance 2.6 Maximum Benefit</p>	<p>14. Due to the Pandemic, and the fact customers have not been paying their utility bills due to job loss, and customer now have large balances, will LIHEAP be raising the limit for approval for households. This would be in an effort to assist catching up those who have had loss of jobs or reduction in work hours.</p>	<p>Since the goal of LIHEAP utility assistance is to offset a portion of the cost for residential natural gas and electric energy costs and extend LIHEAP utility assistance benefits to the maximum number of low-income clients possible, the department views utility assistance benefit levels to be adequate. However, it should be noted that CSD continues to receive billing data from the CPUC to help monitor changes in energy usage and cost during the Pandemic. Therefore, CSD will not pursue the recommendation to significantly increase utility assistance benefit levels at this time. Please note that multiple programs are available to agencies concurrently. Besides LIHEAP, they may use DAP or CAP funding to provide an additional benefit, if needed, to resolve past due amounts to prevent a disconnection or restore services.</p>
<p><u>Val Martinez</u> Redwood CAA</p>	<p>2. Heating Assistance 2.6 Maximum Benefit</p>	<p>15. We recommend that CSD increase the maximum allowable payment to \$2,000 each year due to high energy bills and the increased bill balances due to the moratorium.</p>	<p>See response to question 14 above.</p>

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<p><u>Val Martinez</u> Redwood CAA</p>	<p>2. Heating Assistance 2.6 Maximum Benefit</p>	<p>16. I would recommend once again that we increase our maximum allowable payment to \$2,000 from the current \$1,000 maximum, in order to address those increased cooling costs and heating costs, and also the balances that we are seeing on the utility bills due to the moratorium. We want to help our clients dig out of the hole and the best way to do that is to allow us to pay the maximum allowable limit and increase that in order to compensate for these increased balances that we are seeing, I am sure that the utility companies would be supportive of this as well, because we want our clients out of arrearage just as much as they want our clients out of arrearage. So, these are my two recommendations.</p>	<p>See response to question 14 above.</p>
<p><u>Laura Glass</u> Contra Costa</p>	<p>2. Heating Assistance 2.6 Maximum Benefit</p>	<p>17. I agree with Val Martinez from Redwood on the increase of the UA benefit to \$2,000.</p>	<p>See response to question 14 above.</p>
<p><u>Laura Glass</u> Contra Costa</p>	<p>5. Weatherization 5.11 Weatherization Measures</p>	<p>18. On page 17 the CFL is still checked. However, in the proposed changes you have that "We removed Compact Fluorescent Lamps and are adding LEDs."</p>	<p>CSD has updated this section of the State Plan to make it consistent.</p>
<p><u>Laura Glass</u> Contra Costa</p>	<p>6. Outreach 6.1 Outreach Activities</p>	<p>19. I would like to see it add County Health Departments.</p>	<p>The State Plan has been updated to include County Health Departments to the Outreach section.</p>
<p><u>Charlaine Mazzei</u> Del Norte Senior Center</p>	<p>11. Timely and Meaningful Public Participation 11.1 Input from the Public</p>	<p>20. Is the state plan available on the provider's website? If so, where?</p>	<p>The Draft State Plan is available on CSD's Public website at: https://www.csd.ca.gov/Pages/Public-Notices-Notice-of-Advisory-Committee-Meeting-Draft-2021-LIHEAP-State-Plan.aspx. It is a public document available for everyone to read. It includes the proposed draft and the attachments.</p>

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<p><u>Laura Glass</u> Contra Costa</p>	<p>11. Timely and Meaningful Public Participation 11.5 Comments Received</p>	<p>21. When will the transcript of this meeting be posted? On which site?</p>	<p>There is no transcript for this Advisory Committee Meeting, but the recording of this webinar has been posted at: https://www.csd.ca.gov/Pages/Public-Notices-Notice-of-Public-Hearing-Draft-2021-LIHEAP-State-Plan.aspx.</p>
<p><u>Eugene Ayuyao</u> SC Edison</p>	<p>14. Leveraging Incentive Program</p>	<p>22. I was just curious about the leveraging section in the presentation. Are there any specific metrics that you are recording or plan to report under this section? Activities with IOUs specifically.</p>	<p>The section on Leveraging is information CSD must provide in the State Plan in case HHS releases leveraging money during the program year. CSD must state that we are interested in taking the funding and how it would be used. Funding for leveraging has not been released since 2012.</p>
<p><u>Celia Andrade</u> PACE</p>	<p>14. Leveraging Incentive Program</p>	<p>23. I strongly recommend that CSD review the income guidelines of LIHEAP and that of IOU low income programs and have the income guidelines be the same. It would make leveraging easier and no additional funds will be required.</p>	<p>The income guidelines for the LIHEAP program are established by the LIHEAP Statute. According to Section 2605.b.2.B, "As part of the annual application required by subsection (a), the chief executive officer of each State shall certify that the State agrees to make payments under this title only with respect to households with incomes which do not exceed the greater of (i) an amount equal to 150 percent of the poverty level for such State; or (ii) an amount equal to 60 percent of the State median income."</p>
<p><u>Celia Andrade</u> PACE</p>	<p>14. Leveraging Incentive Program</p>	<p>24. The leveraging of LIHEAP with other low-income programs of the IOUs - I think what is definitely hindering good leveraging opportunity if the income eligibilities are not the same. The income eligibilities of IOUs are sometimes lower than the LIHEAP income eligibility. So, if we track them, it's difficult to have the programs leveraged against each other. I think something must be done to take a look into this.</p>	<p>See response to question 23 above.</p>

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<p><u>Laura Glass</u> Contra Costa</p>	<p>17. Program Integrity 17.4 Citizenship/ Legal Residency Verification</p>	<p>25. "The citizens must provide a copy of their birth certificates, naturalization papers, or passports," and I wonder if all the community action agencies were adhering to that or if they were just taking self-certifications. I know the public jurisdictions need to verify and have copies of legal residency, but I'm just wondering if the community action agencies do, because that is checked under 17.4.</p>	<p>Federal law requires that all public agencies verify that an applicant is a United States citizen, national, or an alien in a qualified immigration status. A copy of the documentation to verify their qualified status must be retained in the client file. Private, non-profit agencies are not required to verify citizenship. Line "Other" in the State Plan specifies that "County Local Service Providers are required to verify citizenship and legal residency."</p>