Seattle City Light

CUSTOMER OPERATIONS

JULY 2024 INTERNAL

Utility Discount Program

PROGRAM BUSINESS OBJECTIVE

Seattle City Light (SCL) is committed to ensuring all customers have access to clean, affordable electricity no matter their financial circumstances. The Utility Discount Program strives to help income-eligible residential customers who are struggling to pay their electricity, water, and waste utility bills across City Light service areas by offering discounted billing. In addition to Seattle, City Light service areas include parts of Shoreline, Lake Forest Park, Unincorporated King County, Burien, Renton, Tukwila, SeaTac and Normandy Park.

PROGRAM OVERVIEW

The Utility Discount Program (UDP) provides bill assistance for income-eligible customers. Households with incomes at or below 70% of State Median Income (SMI) adjusted for household size are offered a discount of 60% on their SCL bills. All income-eligible customers who receive a Seattle Public Utilities' (SPU) bill will receive a 50% discount on their water, sewer, and solid waste services from Seattle Public Utilities. UDP customers whose Seattle Public Utilities services are paid by a landlord or homeowner's association may receive credits for water, sewer, and solid waste services on their City Light bill.

ELIGIBILITY

An applicant is eligible for UDP if the applicant is an adult household member (18 years or over), is the primary City Light residential service account holder and the combined income of all adult household members does not exceed 70% of SMI adjusted for the number of individuals in the household. UDP is open to all customers regardless of their citizenship status, race, gender, ethnicity, or ability. City employees do not ask about citizenship status and serve all customers regardless of immigration status.

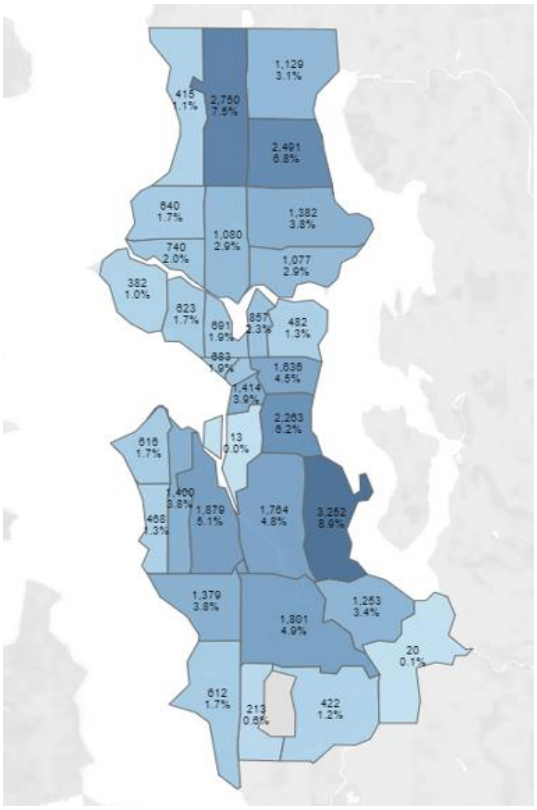
SCL and SPU contracts with the Human Services Department (HSD) to implement key elements of UDP. HSD's team of Program Intake Representatives ensure customers meet eligibility requirements for UDP, as well as being responsible for recertifying customer eligibility (every two years for standard households, three years for elder-only [65+] households). As part of this MOA, HSD also supports UDP outreach and marketing efforts.

2024 Income Eligibility:

(Maximum monthly/yearly household income before taxes and deductions)

People in household	Utility Discount Program (Monthly)	Utility Discount Program (Yearly)
1	$3,689	$44,268
2	$4,825	$57,900
3	$5,960	$71,520
4	$7,095	$85,140
5	$8,230	$98,760
6	$9,366	$112,392
Each Additional	+ $213	+ $2,556

UDP Enrollment by Zip Code/Council District (July 2024):



PROGRAM KEY CONTACTS

Program Manager: Thor Peterson

Financial Assistance Portfolio Manager: Melissa Bookwalter

GOVERNANCE

The Utility Discount Program is governed by SMC 21.49.040, SCL DPP (III-428), City of Seattle Ordinance 125171, and SPU Director's Rule CS-700. SCL and SPU also maintain the MOA with HSD described above for

program implementation. In addition, a Utility Assistance Steering Committee comprised of SCL, SPU and HSD leadership and staff help to inform and align program and policy changes across departments.

FAST FACTS

Portfolio Segment	Financial Assistance
Enrollment Snapshot July 2024 YTD:	**36,614** Customers, Residential
# Staff (SCL) **(HSD)** **(SPU)**	SA: 1.5 PIR: 17 SUP: 1 MGR: 0.5 SA: 1
Eligibility	70% SMI
Product/Offer	Discount on bi-monthly utilities
Application Process	Administered by HSD: Online, Phone, Email, In-Person, Mail https://seattle.gov/human-services/services-and-programs/utility-discount-program.
Administration	Internal
Launch	1982

ENROLLMENT ENHANCEMENT STRATEGIES

According to the Mayor's Innovation and Performance team's Household Eligibility Estimator approximately 126,000 households within SCL's service territory are eligible for UDP under current 70% SMI income

guidelines. SCL, SPU and HSD increased enrollment in the Utility Discount Program (UDP) from approximately over 36,000 in 2024 enrollment. Strategies for increasing enrollment pathways and reducing barriers:

Leveraging Categorical Enrollment (also called cross-enrollment) relies on third-party verification of program eligibility, reducing the need for customers to repeatedly provide income documentation for means-tested programs. Categorical enrollment is typically underpinned by data sharing agreements that allow for exchange of enrollee lists of one-off verification of a household's enrollment status UDP currently uses the following types of categorical enrollment:

- **Auto-enrollment** leverages large lists of households enrolled in other income-eligible programs for bulk enrollment in UDP and uses an opt-out enrollment model shown to dramatically increase enrollment rates. Currently, SCL maintains an auto-enrollment agreement with the Seattle Housing Authority (SHA) for SHA residents and households holding SHA Housing Choice Vouchers (HCV) in private-market housing. Seattle Housing Authority provides an annual global list of SHA residents and HCV holders to SCL for bulk enrollment of new customers and extension of eligibility for existing UDP enrollees. SCL also receives a weekly list of new residents and move-outs from SHA to help keep UDP enrollment current. SCL is seeking additional auto-enrollment opportunities with affordable housing providers and exploring options for partnerships with organizations managing means-tested health care and tax relief programs.
- **The UDP Express Application** allows residents in affordable housing units to allow representatives of the housing provider to verify the applicant's UDP eligibility. In this individual (as opposed to bulk), opt-in process initiated by the applicant, an abbreviated two-page application is completed by both the resident and the housing provider representative. Like Auto-Enrollment, UDP Express relies on agreements with the associated housing providers to ensure enrollee eligibility, and its use could be expanded beyond affordable housing providers.
- **Streamlined enrollment** is an opt-in enrollment mode that utilizes a customer or household's active status in one means-tested program with equal or less-stringent household income requirements as evidence of eligibility in another program. UDP currently allows evidence of active enrollment in Supplemental Nutrition Assistance Program (SNAP) as qualification for UDP enrollment. Customers can provide their SNAP benefits verification letter or SNAP ID or Social Security Number to allow a UDP program intake representative to verify the applicant's SNAP enrollment status in the Washington Department of Social and Health Services' Benefits Verification System database. No additional eligibility documentation is required. Streamlined enrollment could be expanded to many other federal, state, and City programs beyond SNAP.

Self-Attestation allows an applicant to attest to their household's eligibility for the UDP benefit. UDP has not fully implemented self-attestation to date. However, in response to the financial disruption caused by the COVID-19 pandemic, UDP temporarily relied on a household's self-attestation of income for eligibility rather than submission and program verification of documentation prior to receiving benefits. This resulted in over 20,000 unique applications to the program between March 2020 and January 2022. The current program evaluation described below identifies actions to continue to increase enrollment and remove income verification barriers which may have caused many customers to drop from UDP in addition to their circumstances changing after COVID-19**.**

Utility Assistance Programs Automation (UAPA) system launched in 2022, allowing customers to enroll in all three utility assistance programs: UDP, SCL Emergency Bill Assistance (EBA) and SPU Emergency Assistance

Program (EAP) with a single customer-facing online application. On the UAPA back-end, a single household object for each applicant allows for simplification of eligibility documentation across the Utility Assistance programs.

Targeted outreach and cross-promotion - when a program targets enrollment outreach to a group of households identified as likely eligible through specific indicators like the household's participation in another income-eligible program.

- **Affordable Seattle Executive Order 2023-05:** SPU, Department of Education and Early Learning (DEEL), Seattle Parks and Recreation (SPR), the Office of Sustainability and Environment (OSE) and the Seattle Department of Transportation (SDOT) and additional city departments each operate programs that help income-qualified residents. Each program has different income eligibility criteria; however, all include income verification processes, and we are committed to finding options for cross-enrollment. The UDP team is an active participant in this work with these departments through the Affordable Seattle IDT to develop data-sharing consent language so that a resident's application to one program serves as an application to all other citywide programs.
- **Community Connectors at Foodbanks**: HSD contracts with 10 foodbanks and community-based organizations to help communities access programs such as UDP. Community Connectors promote the program to their clients, assist community members in filling out the UDP application and help submit income verifying documentation.
- **Ongoing communications** activities include in-person outreach at community events, some outreach examples include at the 2024 Summer Food Service Programs (SFSP) Kick-off Event at Jefferson Park in Beacon Hill, Northgate Community Center 18th Anniversary, Impact Schools Family Carnival in Tukwila and Byrd Barr's Neighborhood Block Party in the Central District. Promotional materials continue to be available at over 60 public facilities throughout the city (Community Centers, Libraries, Customer Service Centers) and shared out through City Departments newsletters, outreach to Community Based Organizations and direct communications to customers in arrears.

EXPANSION OPPORTUNITIES

Current projects and/or strategies that may help to increase UDP program participation:

(1) Utility Assistance Programs Evaluation (June 2024): A recent program evaluation with over 70 recommendations to streamline operations and increase program participation is being incorporated into a workplan due by December 2024. One key recommendation is to raise income eligibility limits to 80% Area Median Income (AMI) from 70% State Median Income (SMI) to increase access and enrollment, helping to remove many barriers for customers. Program redesign work hopes to center customers with the highest energy burden and include an attestation pathway for program enrollment.

2024 Income Eligibility						
70% State Median Income				80% Area Median Income		
Household Size	Gross Yearly Income	Household Size	Gross Monthly Income	Household size	Gross Yearly Income	Gross Monthly Income
1	$44,268	1	$3,689	1	$77,700	$6,475
2	$57,900	2	$4,825	2	$88,800	$7,400
3	$71,520	3	$5,960	3	$99,900	$8,325
4	$85,140	4	$7,095	4	$110,950	$9,246
5	$98,760	5	$8,230	5	$119,850	$9,988
6	$112,392	6	$9,366	6	$128,750	$10,729
7	$114,936	7	$9,578	7	$137,600	$11,467
8	$117,492	8	$9,791	8	$146,500	$12,208
9	$120,048	9	$10,004	9	$155,350	$12,946
10	$122,604	10	$10,217	10	$164,200	$13,683
Source:	SMI: Washington State Dept of Social and Health Service					
	AMI: Seattle Housing Authority https://www.seattlehousing.org/housing/sha-housing/eligibility/income-level-low-income-public-housing					

(2) Washington State Department of Commerce Clean Energy Credits (September 2024): As part of the Climate Commitment Act, WA State Department of Commerce is providing SCL $19,131,893.35 to distribute to 90,876 customers $200 in Clean Energy Credits per customer households at or below 80% Area Median Income. Funds must fully be distributed by 9/15/24. SCL plans to automatically apply this credit to approximately 40,000 households of residential customers who currently or previously participated in any of the following on or after January 1, 2022: Participation in the Utility Discount Program; recipient of financial assistance from LIHEAP, Emergency Bill Assistance, or Project Share; Previous or current participant in an SCL payment arrangement or payment plan. Customers who are receiving this credit may also qualify for UDP and will have opportunities to enroll for ongoing bill assistance through SCL Communications Team outreach.