

STATE OF NEW YORK
DEPARTMENT OF PUBLIC SERVICE

- Case 14-M-0565 - Proceeding on Motion of the Commission to
Examine Programs to Address Energy
Affordability for Low Income Utility
Customers
- Case 23-M-0298 - In the Matter of Budget Appropriations to
Enhance Energy Affordability Programs.

STAFF WHITE PAPER ON IMPLEMENTING AN
ENHANCED ENERGY AFFORDABILITY POLICY

Dated: March 18, 2025

Table of Contents

INTRODUCTION AND BACKGROUND	3
Procedural History	3
2023 Budget Appropriation	8
Summary of Moderate-Income Programs in Other States	9
Working Group Engagement	13
THE STRAW PROPOSAL	15
Program Integration	17
Eligibility	17
Enrollment	20
Benefit Levels	24
Utility Budget Levels and Bill Impacts	28
Program Evaluation	33
Coordination with Other Programs	34
CONCLUSION	35

List of Appendices

SUMMARY OF PARTY COMMENTS	Appendix A
EXPANDED EAP SUBGROUP – PROGRAM MATRIX	Appendix B
ESTIMATED DISCOUNT LEVELS	Appendix C
ESTIMATED BUDGETS WITH ADJUSTED CAP	Appendix D
SAMPLE COLLECTION ACTIVITY REPORT	Appendix E

INTRODUCTION AND BACKGROUND

On May 20, 2016, the Public Service Commission (Commission) issued an order adopting an Energy Affordability Policy that set a target energy burden at or below six percent of household income for all low-income households in New York State.¹ To advance this goal, low income bill discount programs were established for each of the large investor-owned electric and gas distribution utilities. The Commission established key directives through the Energy Affordability Policy, including the standardization of utility energy affordability programs (EAPs) statewide to reflect best practices where appropriate, the streamlining of rate cases, and greater consistency between the programs and the Commission's statutory and policy objectives. The Commission also acknowledged that, to reach the target six percent energy burden for low-income New Yorkers, it would be necessary to coordinate and leverage all available resources at the State's disposal, including multiple sources of financial assistance to lower customers' bills, energy efficiency measures to reduce usage, and access to clean energy sources to lower the cost of the energy itself.

In the May 2016 Order, as well as the subsequent Implementation Order² and Rehearing Order,³ the Commission discussed the evolution of providing targeted financial assistance to low-income customers in pursuit of achieving the

¹ Case 14-M-0565, Order Adopting Low Income Program Modifications and Directing Utility Filings, (issued May 20, 2016), p. 3 (May 2016 Order).

² Case 14-M-0565, Order Approving Implementation Plans with Modifications (issued February 17, 2017) (Implementation Order).

³ Case 14-M-0565, Order Granting in Part and Denying in Part Requests for Reconsideration and Petitions for Rehearing (issued February 17, 2017) (Rehearing Order).

six percent household energy burden goal. At the time of that Order, it was expected that financial assistance in the form of utility discounts would serve as a first step in the overall process, and later phases of the proceeding would continue to refine this bill assistance program and incorporate other methods of assistance as necessary to realize the six percent energy burden goal for New York's low-income utility customers. Additional efforts to reduce the energy consumption of low-income households through more efficient energy usage are a necessary element for achieving the Commission's energy affordability goals.

On August 12, 2021, the Commission re-examined its Energy Affordability Policy and issued its Order Adopting Energy Affordability Policy Modifications and Directing Utility Filings, which adopted certain modifications and improvements to the energy affordability policy framework established in the May 2016 Order.⁴ In the EAP Modification Order, the Commission directed Department of Public Service Staff (Staff, or the Department) to convene a stakeholder Energy Affordability Policy Working Group (Working Group), within 60 days of the effective date of the EAP Modification Order, and encouraged participation from all interested stakeholders to work together to consider ways of improving EAPs. Beginning in September 2021, Staff convened Working Group meetings on a bi-weekly basis with discussions focused on numerous issues related to the improvement of EAPs, as well as the remediation of substantial customer arrears resulting from the COVID-19 pandemic.

Based on the recommendations of the Working Group, the Commission took historic action to address arrears amassed

⁴ Case 14-M-0565, Order Adopting Energy Affordability Policy Modifications and Directing Utility Filings (issued August 12, 2021) (EAP Modification Order).

during the pandemic and issued two orders directing one-time bill credits to customers.⁵ On June 16, 2022, the Commission issued its Arrears Phase 1 Order⁶ to address arrears held specifically by low-income customers, and on January 23, 2023, the Commission issued its Arrears Phase 2 Order⁷ to address arrears held by residential customers who did not receive arrears relief under the Phase 1 Order and small-commercial customers.

The New York State Budget for the fiscal year 2023-2024 (FY 24 Budget) included an appropriation of \$200 million designated to provide prompt utility bill relief related to the costs of utility EAP programs authorized by the Commission and administered by the Department, in consultation with the Working Group (FY 24 Budget Appropriation).⁸ In addition, the Department was charged with establishing a program to provide an “energy affordability guarantee” to participating residential customers in the EmPower Plus Program administered by the New York State Energy Research and Development Authority (NYSERDA) who fully electrify their homes. Further, the Department was tasked with establishing a new, expanded, discount program for residential customers who do not currently qualify for the existing utility energy affordability programs, but whose income is below the state median income (SMI). The Department was also asked to consider the feasibility of using area median income

⁵ Cases 14-M-0565 et al., Energy Affordability Policy Working Group Status Report (issued February 21, 2025).

⁶ Cases 14-M-0565 et al., Order Authorizing Phase 1 Arrears Reduction Program (issued June 16, 2022) (Arrears Phase 1 Order).

⁷ Cases 14-M-0565 et al., Order Authorizing Phase 2 Arrears Reduction Program (issued January 19, 2023) (Arrears Phase 2 Order).

⁸ Aid to Localities Appropriation, Chapter 53 of the Laws of 2023.

(AMI) in the event the use of SMI prevents reaching all households that have an energy burden greater than six percent. Residential customers of electric corporations regulated by the Commission and the Long Island Power Authority (LIPA), and its service provider, shall be eligible to participate in this new, expanded discount program.

The Commission took two actionable steps to date to address the duties placed upon it by the FY 24 Budget. First, the Commission issued its Order Authorizing Energy Bill Credit on February 15, 2024.⁹ This order, which adopted the recommendations of the Working Group's November 21, 2023 New York State Energy Bill Credit Report,¹⁰ provided utilities administering a low income monthly bill discount program with an pro rata allocation of the \$200 million budget appropriation in order to provide their customers prompt bill relief.¹¹ In addition, the one-time bill credit was designed to offset at least in part the effect of rapidly increasing commodity prices during and after the period of the implementation of the EAP Arrears Phase 1 and Phase 2 programs.¹² The one-time bill

⁹ Case 14-M-0565 and Case 23-M-0298, In the Matter of Budget Appropriations to Enhance Energy Affordability Programs, Order Authorizing Energy Bill Credit (issued February 15, 2024).

¹⁰ These recommendations were adopted in Ordering Clause 5 of the Order Authorizing Energy Bill Credit (issued February 15, 2024).

¹¹ The utilities administering an energy affordability program are: Central Hudson Gas and Electric Corporation (Central Hudson); Consolidated Edison Company of New York, Inc. (Con Edison); National Fuel Gas Corporation (NFG); The Brooklyn Union Gas Company d/b/a National Grid NY (KEDNY); Keyspan Gas East Corporation d/b/a National Grid (KEDLI) and Niagara Power Corporation d/b/a National Grid (NMPC); New York State Electric and Gas Corporation (NYSEG); Rochester Gas and Electric Corporation (RG&E); Orange & Rockland Utilities, Inc.

¹² Historical retail prices of electricity can be found here:

credits were reflected on customers' bills between March and October 2024. Each utility filed a report with the Secretary to the Commission that summarized the number of accounts, and the total credit applied.¹³

Second, the Commission issued its Order Approving Energy Affordability Guarantee Pilot on August 15, 2024, to establish an affordability guarantee for participating residential customers who electrify their homes as part of the EmPower Plus Program administered by NYSERDA.¹⁴ The November 15, 2024 Implementation Plan outlined operational details and associated milestones for the first two years of the pilot, including plans for implementation and outreach to eligible households.¹⁵

The next step for the Commission, and the focus of this Staff white paper, is to establish enhanced EAP bill discount programs for residential customers who do not currently qualify for a low-income EAP bill discount program but whose income is below SMI or AMI. Because utility rates and tariffs would need to be modified to effectuate this action, Commission approval is necessary. Consequently, Staff puts forth herein a proposal to establish enhanced EAP bill discount programs for residential customers who do not currently qualify for a low-income EAP bill discount program but whose income is below SMI

<https://www.nyserda.ny.gov/Energy-Prices/Electricity/Monthly-Avg-Electricity-Residential>. Typical electric bills can be found here: <https://dps.ny.gov/electric-utility-ten-year-historic-average-monthly-bill-data-typical-customers>. Typical gas bills can be found here: <https://dps.ny.gov/gas-utility-ten-year-historic-average-monthly-bill-data-typical-customers>.

¹³ Cases 14-M-0565 et al., Phase 1 Credits Reports.

¹⁴ Case 14-M-0565, Order Approving Energy Affordability Guarantee Pilot (issued August 15, 2024).

¹⁵ Case 14-M-0565, Energy Affordability Guarantee Pilot Implementation Plan (filed November 15, 2024).

or AMI.

To accomplish the goal of establishing an enhanced EAP bill discount program for residential customers who do not currently qualify for an EAP bill discount program but whose income is below SMI, Staff proposes that utilities: (1) establish a self-identification process using an information clearinghouse for eligibility verification; (2) develop monthly bill discounts; (3) program a bill discount into their respective billing systems to become effective December 1, 2025; and (4) collect certain data to assess whether the usage of AMI or other program modifications are in the public interest. Through the Working Group, Staff continues to explore the details of designing a new bill discount program, including program alternatives.

FY 24 BUDGET APPROPRIATION

The FY 24 Budget Appropriation language is as follows:

ENERGY AFFORDABILITY PROGRAM \$200,000,000
For prompt assistance to utility customers related to the costs of utility affordability programs authorized by the Public Service Commission and administered by the Department of Public Service, in consultation with the energy affordability policy working group. Additionally, the department shall establish a new, expanded discount program to provide utility bill relief to utility customers, in consultation with the energy affordability policy working group, for residential customers that do not currently qualify for the energy affordability policy program but whose income is below the state median income, provided however that the Public Service Commission shall consider the feasibility of using area median income or other eligibility thresholds in the event the use of state median income prevents reaching all households that have an energy burden greater than six percent. Residential customers of electric corporations regulated by

the Public Service Commission and the Long Island Power Authority, and its service provider shall be eligible to participate in the new, expanded discount program. The department shall also establish a program for such purpose to provide an energy affordability guarantee to participating residential customers in the EmPower Plus Program administered by the New York State Energy Research and Development Authority who electrify their homes in accordance with program standards required by the authority; provided, however, that the department is authorized to establish a cap on a residential customer's annual total electric usage by kilowatt hour applicable to the guarantee when establishing such program. The energy affordability guarantee shall provide that any participating residential customers in the EmPower Plus Program shall spend no more than six percent of household income on electric utility bills for the estimated useful life of the related electrification project. The energy affordability guarantee is to remain with the residence that participated in the Empower Plus Program and can transfer between tenants or owners through the electric corporation's application for service, provided however that the benefits of this program can only be transferred to eligible new tenants or owners. Amounts appropriated herein may be disbursed to the utilities, including the Long Island Power Authority, on behalf of utility customers as determined by the Department of Public Service based on their share of energy affordability policy program expenditures during calendar year 2022.

Summary of Moderate-Income Programs in Other States

To develop an effective policy for moderate-income utility bill relief in New York, Staff has reviewed similar programs in other states. The following provides a summary of other states with targeted moderate-income programs.

Illinois

Illinois has both a state low-income assistance fund and a Percentage of Income Payment Plan (PIPP).

Illinois uses ratepayer funds for a statewide PIPP. Under the PIPP, income-eligible participants (households with incomes up to 200 percent of the Federal Poverty Level (FPL)) pay no more than six percent of their income for gas and electric service. Customers sign up for PIPP online or through local county Department of Commerce and Economic Opportunity agencies. Customers must provide proof of past income, a copy of their most recent heating bill, Social Security card or individual taxpayer identification number (ITIN), a copy of the customer's rental agreement showing that heating is included in the monthly rental amount, and proof that the household received Temporary Assistance for Needy Families (TANF) or other income-based benefits such as Medicaid or Supplemental Nutrition Assistance Program (SNAP).

New Jersey

Funded from the New Jersey general fund, the Lifeline Assistance Program (LAP) provides an annual \$225 credit on electric or natural gas bills to disabled and senior citizen customers who are income eligible. Supplemental Security Income recipients receive LAP automatically; beneficiaries of Medical Assistance to the Aged, Medical Assistance Only, or New Jersey Care, are sent LAP applications automatically every August.

New Jersey's Universal Service Fund (Service Fund) is a program designed to make natural gas and electric bills more affordable for low-income households. It is administered by the New Jersey Department of Community Affairs and funded through a Social Benefit Charge (SBC) paid by all regulated electric and gas utility customers. Customers may enroll through a joint application federal Low-Income Home Energy Assistance Program

(LIHEAP), or they may apply directly online, in person at local LIHEAP/USF application agencies, sending the application and documentation through the mail, or through the Department of Community Affairs local agency. The customers get a notification from the Department of Community Affairs if they are eligible for their program and their designated benefit amount. If they are ineligible, they will receive a notice on why the application was denied and be afforded the opportunity to dispute the denial if they think there was an error.

The Service Fund will fund a percentage of income payment plan under which participants will be required to pay no more than six percent of their annual income toward electric and gas bills - three percent for electric and three percent for gas, or six percent for all-electric heat customers. This benefit is capped at \$1,800 for gas and electric combined. New Jersey electric and gas customers whose household income is equal to or less than 175 percent of the FPL are eligible for the program, determined by the NJ Department of Community Affairs with assistance from local Community Action Agency offices. First-year Service Fund participants are also eligible for arrearage forgiveness under a program component called Fresh Start, which forgives a customer's pre-program arrears if participants pay their monthly bills in full and on time for an entire year. As of October 2024, the Service Fund had over 205,000 participants.

The New Jersey Payment Assistance for Gas and Electric program (PAGE), administered by the not-for-profit New Jersey SHARES on behalf of the New Jersey Board of Public Utilities, is an annual assistance program designed to help low and moderate-income households that experience an economic hardship. Participants up to 100 percent of the SMI who hold at least \$100 in arrears, are eligible to receive grants up to \$700 for

natural gas service (including cooking gas) and up to \$700 for electric service once per calendar year. PAGE is provided in part by the New Jersey Department of the Treasury.

Ohio

Ohio's regulated gas and electric utilities are mandated to participate in the statewide PIPP Plus. Low-income customers who heat with natural gas pay six percent of their monthly income or \$10 (whichever is greater) to both their gas and electric company. Customers with all-electric homes pay \$10 or ten percent of their gross monthly household income each month, whichever is greater. Zero-income customers are required to pay a \$10 minimum monthly payment for both natural gas and electric. When PIPP Plus payments are made on time and in full, customers earn an incentive credit and an arrearage credit. If they make full, on-time payments for a consecutive 24-month period, all of the arrearages are eliminated. Customers must have a household income at or below 175 percent FPL to be eligible. Eligibility is verified by the Office of Community Assistance and local agencies. Customers are enrolled by filling out an Energy Assistance Program Application and mailing it to the Ohio Office of Community Assistance or by filling out the application and scheduling an appointment (in-person, on the phone, or remotely) with their local energy assistance program provider. Customers need to bring the following: copies of their most recent bills; a list of all household members and proof of income for the last 30 days or, preferably, 12 months for each member; proof of citizenship or legal residency for all household members; and, if applicable, proof of disability. These customers must annually reverify their household members' incomes by applying online or visiting a local Community Action Agency.

Customers who become income ineligible for PIPP Plus,

but are current on their PIPP Plus payment, are placed on Graduate PIPP Plus. The graduate programs are designed to provide customers with a 12-month transition from PIPP Plus to full payments. Customers generally pay an average of their most recent PIPP Plus amount and a budget-bill amount calculated by their utility. Customers who make payments on time and in full will continue to receive credits toward their monthly bill balance and a 1/12 credit to their old debt.

California

California utilities offer the Family Electric Rate Assistance Program (FERA), a flat 18 percent discount on electricity bills to households with incomes between 200 percent FPL and 250 percent FPL. Applicants follow a self-enrollment process, in which the customer provides self-attestation that they meet the income requirements or participate in an eligible assistance program. Applications are good for two years before an eligible customer must re-enroll. Since income verification is not required, utilities occasionally conduct random audits of subsets of customers at which time customers are required to provide income documentation or be un-enrolled. In addition, high energy users are also subject to energy efficiency audits and may be subject to withdrawal from the program. Estimates place FERA enrollment at approximately 20 percent of eligible households in the state.

WORKING GROUP ENGAGEMENT

The Working Group created an Enhanced EAP subgroup that informed the development of the expanded discount program recommendations contained in this white paper. The Enhanced EAP subgroup met on September 21, October 5, October 19, November 19, and November 30, 2023, to formulate and discuss a series of threshold questions that would help guide the program design and

capture the universe of households that may be eligible and identifiable.

The first threshold question that the Enhanced EAP subgroup explored was to approximate the pool of eligible households. Using U.S. Census data, the subgroup estimated approximately one million households could be eligible in New York.¹⁶ Similar to using HEAP to identify and automatically enroll households in EAPs, the Enhanced EAP subgroup next considered the feasibility of automatic enrollment for moderate-income households. To accomplish automatic enrollment, the Enhanced EAP subgroup identified and assessed multiple assistance programs and other potential data sources to use as partial proxies for identification purposes, such as Elderly Pharmaceutical Insurance Coverage (EPIC), and the Emergency Rental Assistance Program. As the Enhanced EAP subgroup found during this process, many moderate-income households either do not qualify for or do not participate in assistance programs that could be used to identify or validate eligible participants, whereas other proxy data may not be readily accessible due to privacy concerns or other legal constraints. The Working Group's conclusion was that to achieve total coverage of the moderate-income population would require comprehensive and objectively accurate income data, of the type possessed by the Department of Taxation and Finance's taxpayer data. The complete matrix of potential crossover programs for

¹⁶ A subsequent NYSEDA analysis shared with Staff and derived from the American Community Survey (ACS) 2017-2021 data set informed the Working Group that up to 1.28 million households in New York may be between 60 and 80 percent median income when accounting for the highest of state median income (SMI) or area median income (AMI). American Community Survey, 2017-2021. United States Census.
<https://data.census.gov/table/ACSDP5Y2021.DP03?q=DP03&g=040XX00US36>. (Data accessed November 8, 2024).

moderate-income households identified by the subgroup is provided in Appendix B.

Building upon the Enhanced EAP subgroup's work, Staff continued to engage with the Working Group in 2024 and early 2025 to provide additional analyses and garner stakeholder input on potential Enhanced EAP program design elements, such as eligibility, enrollment and verification methods, discount levels, and program budget. This consultation with and feedback from the Working Group stakeholders over a lengthy period of public discussion informed Staff's straw proposal.

THE STRAW PROPOSAL

In this section, Staff presents a Straw Proposal for a statewide Enhanced EAP pilot program design that builds on existing programs, offers a basic structure for program design while allowing flexibility to incorporate other elements, and incorporates best practices as well as innovative approaches suggested by the parties. Staff offers the Straw Proposal as a framework for further party comment and discussion, to inform the Commission's future actions to implement the Enhanced EAP pilot program.

In addition to the following goals, Working Group stakeholders provided a wide range of opinions on how these programs should be designed and implemented. Staff nevertheless identified several common themes and areas where there was strong consensus:

- The utility programs should be simple to understand, explain, and administer. This both helps customers understand the level of assistance available and lowers the administrative costs of the programs.
- During the initial two-year pilot phase, programs should be generally available to all customers whose

incomes are below 100 percent of SMI and who are not currently eligible for, or receiving, low-income EAP benefits. Further, the utilities should collect and report on geospatial data during the pilot phase to help determine whether the use of AMI rather than SMI in certain areas is necessary to ensure all households in the State are below a six percent energy burden.

- Until automatic enrollment opportunities are identified and implemented, each utility should engage with a clearinghouse to verify household eligibility. Utilities should report to the Department within 60 days of a Commission Order indicating: (1) whether the clearinghouse was already under contract by the utility, or if a new qualified contractor was identified; and (2) the name of the entity to be used for such purposes.
- Utilities should identify the most efficient and least intrusive means to gain customer consent for verification purposes.
- Utilities should identify the most effective methods to reach potentially eligible customers of the program.
- The programs should automatically enroll eligible customers when identification of eligible households is possible.
- Alternative discount payment structures should be considered in certain circumstances to minimize administrative cost and maximize impact of benefit (i.e. payments delivered annually rather than monthly when monthly discount levels are below a certain threshold).
- Programs should be designed to achieve the goal that recipient households do not pay more than a six percent

energy burden.

- While the costs of the programs will be borne by all classes of customers, alternative funding sources should continue to be sought to minimize ratepayer financial impacts overall, and particularly regressive impacts.

These principles have generally guided Staff's development of the straw proposal recommendations.

Program Integration

Staff proposes that utility enhanced EAPs operate under the general framework and budgets of utility low-income EAPs. Staff considered whether the enhanced EAPs should operate independently but, in addition to several factors outlined in subsequent sections, favors the lower administrative burden of developing enhanced EAP customer tiers as extensions of the low-income EAPs already in operation.

Straw Proposal Recommendations for Program Integration

- Utilities would establish enhanced EAP tiers described herein within the structural and budgetary framework of existing low-income EAPs.

Eligibility

The FY 24 Budget instructs that eligible customers shall include *"residential customers that do not currently qualify for the energy affordability policy program but whose income is below the state median income."* Further, the enabling language requires the Commission to *"consider the feasibility of using area median income or other eligibility thresholds in the*

event the use of state median income prevents reaching all households that have an energy burden greater than six percent."

Staff proposes that, during the initial two-year pilot period, eligibility be extended to all residential customers below New York's SMI who do not currently qualify for a utility low-income EAP except for in the Consolidated Edison Company of New York (Con Ed) and KeySpan Energy Delivery New York (KEDNY) utility territories, in which the AMI identified by the U.S. Department of Housing and Urban Development (HUD) shall be used.

According to 2022 U.S. Census data, New York's SMI is \$79,557¹⁷ and New York City AMI is \$113,000.¹⁸ Sixty percent of SMI is \$47,734, or a monthly income of \$3,978. Sixty percent of New York City AMI is \$67,800, or a monthly income of \$5,650. This data is inclusive of all household sizes in New York State and New York City, respectively, and will be updated as the program receives new information during the initial pilot period.

The Staff proposal breaks out eligible customers into three categories: low income households below 60 percent median income that are currently ineligible for EAPs, moderate income households between 60 and 80 percent median income, and households between 80 percent and 100 percent median income. Staff recognized some customers may have incomes below 60 percent median income and currently be ineligible for EAPs. As an example, certain households may not currently qualify for

¹⁷ U.S. Census American Community Survey Data, New York Median Income: <https://data.census.gov/table/ACSST1Y2022.S1903?t=Income%20and%20Poverty&g=040XX00US36> (last accessed February 28, 2025).

¹⁸ New York City Housing Preservation and Development, Area Median Income: <https://www.nyc.gov/site/hpd/services-and-information/area-median-income.page> (last accessed February 28, 2025).

state and federal programs used for EAP income verification. For purposes of this proposal, this pool of customers may enroll in an EAP. Preliminary stakeholder analysis provided to Staff and available in Appendix A estimates this pool of customers may include anywhere from below 100,000 to as many as 246,000 households. Using 2022 Census data, Staff estimates 650,000 households qualifying as moderate income.¹⁹ For the third category, estimates garnered from U.S. Census data identify approximately 700,000 households with between 80 and 100 percent median income. To better inform this proposal, Staff will continue to seek additional information on all three subsets of households to determine more precise estimates.

Staff finds that further study is necessary to evaluate whether determining eligibility county by county based on SMI or AMI is in the public interest, or if some other blanket method might be more effective and lessen administrative expenses. For example, while Staff agrees the use of AMI may marginally increase the number of households with a greater than six percent energy burden in certain areas of the state, the use of AMI in other areas may lead to marginal decreases in program eligibility. To illustrate this, median income for a household of two in Binghamton, NY is \$71,000 compared to the SMI of \$79,557. The use of AMI in Binghamton could lead to fewer households qualifying for discounts. In addition, in the absence of household-specific energy burden data, the use of AMI may inadvertently lead to lower discount levels for some participants. Further, the extent to which discounts would be necessary for such households to achieve the target energy

¹⁹ U.S. Census American Community Survey Data, New York Median Income, 2022. Staff notes other surveys suggest fluctuations in household count but proposes using the provided figure for modeling purposes of this white paper.

burden is unclear. Analysis conducted by Staff and described in the discount level section below demonstrates most households approaching moderate income levels do not need an additional benefit to achieve a six percent energy burden; as such, additional income-eligible households may similarly require little to no benefit to achieve the target energy burden.

The challenges identified above should not prevent further exploration of potential targeted usage of AMI to help more households achieve the six percent target energy burden; to the contrary, Staff believes targeted usage of AMI may be in the public interest and instructs the utilities to collect and report additional data during the pilot period to inform potential program modifications. Staff also seeks and anticipates thoughtful stakeholder comments on the potential benefits or burdens of using AMI versus SMI on a statewide or county by county basis, or in some more targeted manner.

Straw Proposal Recommendations for Program Eligibility

- Con Edison and KEDNY would extend eligibility to all residential customers below New York City AMI that do not currently qualify for low-income EAPs during the two-year pilot period.
- Other utilities would extend eligibility to all residential customers below SMI that do not currently qualify for low-income EAPs during the two-year pilot period.

Enrollment

Enrollment in utility-run enhanced EAPs would be managed through a self-enrollment process during the pilot period. Staff considered opportunities to identify and automatically enroll eligible customers in the moderate-income

program through matching data with comparable eligibility, including those outlined in Appendix B, but found such opportunities are currently limited due to: (1) no other program or combination of programs captures the entire eligible population;²⁰ (2) barriers such as data privacy policies limit potential data sharing arrangements; (3) fewer customers are believed to be identifiable within potential data sharing opportunities; and (4) administrative burdens related to establishing data sharing arrangements.

Nonetheless, Staff notes the potential benefit of automatic enrollment is clearly demonstrated by its use in the low-income EAP, and continues to explore such opportunities. For instance, recently enacted legislation will require a data sharing arrangement to automatically enroll eligible EPIC recipients in HEAP later this year.²¹ Given EPIC includes moderate-income households, Staff will explore whether the Department's arrangement with the Office of Temporary and Disability Assistance (OTDA) to identify data match opportunities for low-income EAPs affords an opportunity to identify and refer moderate-income EPIC recipients for the moderate-income program, or whether a similar data sharing arrangement can be established with the Department of Health (DOH). Further, several NYSERDA-managed programs similarly serve low- to moderate-income households,²² and may afford a reasonable data match opportunity. Staff will continue working with the Working Group to identify potential data match

²⁰ Moderate-income is defined by NYSERDA as 60% to less than 80% of State or Area Median Income, whichever is greater <https://www.nyserda.ny.gov/All-Programs/EmPower-New-York-Program/Eligibility-Guidelines>.

²¹ Chapter 633 of the Laws of 2024.

²² NYSERDA programs define moderate income as 60 to 80 percent SMI or AMI, whichever is more beneficial.

opportunities and will propose data sharing for the moderate-income EAPs when appropriate and feasible.

Staff proposes utilities leverage existing enrollment mechanisms when feasible, and verify income eligibility independently or through use of a clearinghouse.²³ Staff reviewed the self-attestation model used by the FERA program in California, but believes that consistent eligibility verification is essential to ensure the integrity of a bill discount program, absent objective proof that such verification is not needed. While utilities would not be prohibited from directly conducting eligibility verification, Staff recognizes clearinghouses may provide a less administratively burdensome means of verification. Utilities already utilize clearinghouses to verify customers' risk factors and should assess whether those existing clearinghouse partnerships would suffice for moderate-income program verification or whether other qualified vendors should be considered. When feasible, utilities would verify a customer's eligibility in the moderate-income program concurrently with other clearinghouse requests for that customer to avoid unnecessary duplication of verification. Utilities would also prioritize clearinghouse verification of households recently removed from the low-income EAPs given the stronger likelihood they are now eligible for the moderate-income EAPs.

Further, Staff recognizes leveraging clearinghouses for eligibility verification may pose excessive administrative burden, absent some strategizing on adopting a lesser or least cost scenario. It is thus recommended that utilities conduct a benefit-cost analysis to determine the estimated unit and

²³ For purposes of this proposal, a clearinghouse may include a qualified entity that performs data analytics, population analytics, income verification, or other service appropriate to determine customer eligibility for this program.

comprehensive program costs of verifying all estimated eligible customers in the program as compared to the level of benefit enrolled participants would receive. Such analysis should also include the use of a single clearinghouse, jointly used and paid for by the utilities.

Staff will continue to explore other verification processes to identify automated data matching or alternative income verification methods, including through potential partnerships with NYSERDA and the New York State Department of Taxation and Finance.

Straw Proposal Recommendations for Program Enrollment

- Utilities would establish a self-registration process to begin enrolling customers no later than December 1, 2025.
- Utilities would conduct a benefit cost analysis on independent verification as well as the use of an income verification clearinghouse, including a scenario in which utilities jointly procure a single entity.
- Utilities not conducting independent verification would contract, or use an existing contract, with a clearinghouse designed to verify customer income.
- Utilities would be required to disclose to self-identifying customers that income verification will be required.
- Utilities would develop and deploy outreach programs and content to inform customers of the benefit and how qualified customers may register.
- Utilities would explore automatic enrollment or verification opportunities for all customers who recently stopped receiving low-income EAP benefits.

- Other eligibility criteria (e.g., introduction of statewide moderate-income programs, income data match with New York State Department of Taxation and Finance if legally authorized) could be revisited, provided an automatic enrollment process can be implemented.
- Alternative means of enrollment, whether by file match or manual enrollment, would be permitted but not required.

Benefit Levels

The Straw Proposal recommends beginning with fixed discounts that are simple to administer and would establish discounts at the appropriate level required to achieve a six percent energy burden. Under this methodology, if approved by the Commission, during the initial data collection and implementation pilot period, discounts would be calculated based on the 70 percent median income level for moderate income customers with incomes between 60 percent and 80 percent median income and the 90 percent median income level for customers between 80 percent and 100 percent median income. Discounts for customers below 60 percent median income but who otherwise do not qualify for low-income EAP would be set at a level equivalent to the benefits provided for Tier 1 customers in low-income EAP. This structure more appropriately correlates discount levels with need and reflects potential future data match opportunities for the moderate-income tier.

Utilities are able to estimate the average usage levels of heating and non-heating participants and calculate their average monthly bills. Until moderate-income monthly

usage and billing data is available following enhanced EAP implementation, the data on average bills faced by low-income participants and furnished to Staff through the utilities' annual low-income program discount and budget workpaper submissions would serve as a proxy to identify probable moderate-income usage. Given the typical usage for heating and non-heating customers varies widely among utilities, the Straw Proposal recommends that the level of the average low-income bill at each utility be used to establish more targeted discount levels for moderate-income customers at that utility.

Staff analysis provided in Appendix C depicts estimated discount levels needed to achieve the six percent energy burden goal at varying income levels below SMI or AMI, but equal to or greater than 60 percent of SMI or AMI. As the analysis shows, estimates for the statewide average monthly discount needed to achieve the six percent energy burden for a household at 70 percent of median income, representing 60 to 80 percent median income households, is \$3.00. As with the low-income EAPs, Staff's modeling shows wide variation between utilities and between gas heat, gas non-heat, electric heat, and electric non-heat customers. For instance, a Con Edison gas heat customer at 70 percent AMI is estimated to need a \$57.45 benefit to achieve the target energy burden, whereas a National Grid upstate gas heat customer at 70 percent SMI is estimated to require no additional benefit to achieve a six percent energy burden.

Staff's analysis goes on to estimate the average monthly discount needed to achieve the six percent energy burden for a household at 90 percent of median income, representing the 80 to 100 percent median income households, at \$0.15. This low amount is reflected by few customer tiers in the 80 to 100 percent median income group across utilities

demonstrating energy burdens above six percent based on current modeling. Nonetheless, in adhering to the 2023 Budget appropriation requirement "to provide utility bill relief ... for residential customers that do not currently qualify for the energy affordability policy program but whose income is below the state median income," and acknowledging updated data during program implementation, demographic shifts, or more targeted data at a future time may demonstrate greater than six percent energy burden, customers who fall within this tier and self-identity may receive a marginal benefit.

For customers ineligible for enrollment in low-income EAPs and whose incomes are verified to be below 60 percent moderate income, Staff proposes a benefit equal to the discount provided for low-income EAP Tier 1. This benefit better aligns with customer need and conforms to the process and benefit level currently designated for customers who are not regular HEAP recipients and who self-enroll in low-income EAPs.²⁴

Staff proposes minimum discount levels for enhanced EAP participants, similar to those in place for low-income EAPs. Specifically, Staff proposes customer tiers not demonstrating a need greater than \$3 per month in the 60 to 80 percent tier receive a \$3 minimum payment; customers in the 80 to 100 percent tier not demonstrating a need greater than \$1 per month receive a \$1 minimum payment. Staff encourages comments on the appropriate benefit amount for enhanced EAP customers not demonstrating need. Given the potentially low discount amounts, Staff also seeks comments on whether less frequent discount intervals would be appropriate to allow discounts to accrue.

In sum, the Straw Proposal would apply fixed

²⁴ May 2016 Order, p. 20.

discounts, designed to achieve a targeted energy burden as a percentage of income, for a customer tier consisting of utility-specific typical usage levels of heating and non-heating customers. The discount level would vary with customer income. The amount of the discount would be reset annually, or over the terms of rate plans, using this method.

The discount is calculated based on the total bill. It therefore includes the utility's supply costs; however, it is intended to be applied as a discount to delivery charges. Retail access customers therefore would receive the same discount; and if the ESCO supply charge is less than the utility's charge, the percentage discount is amplified (and vice-versa).

Straw Proposal Recommendations for Rate Discounts

- Utilities would develop monthly rate discounts and program the discounts in their respective billing systems to become effective December 1, 2025.
- Separate discounts for 60 percent to 80 percent median income tier and 80 percent to 100 percent median income tier.
- Customers ineligible for low-income EAP but verified below 60 percent median income to presumptively receive benefits equal to low-income EAP Tier 1 benefits, provided that a potential recipient's ineligibility is not predicated upon some disqualifying characteristic(s).
- Discount amounts would be set at an amount sufficient to achieve a six percent energy burden on the levelized monthly total bill for the average participant in each tier, assuming income at 70 percent of median income, and 90 percent of median income.

- The six percent calculation is based on a customer tier corresponding to the levelized average heating and non-heating bill at each utility.
- Discount calculation includes utility supply costs but is applied solely to delivery charges (ESCO customers receive same discount).
- Discount levels to be reset annually in same manner and time as low-income EAP.
- Minimum monthly discount of \$3 for below 80 percent customer tier; minimum monthly discount of \$1 for 80 percent to 100 percent tier.
- Consideration of accrued credits paid out on semiannual/annual bases when benefit exceeds administrative cost.

Utility Budget Levels and Bill Impacts

Staff conducted modeling with the energy burden estimates in Appendix C to better understand potential enhanced EAP program budget implications for each of the three tiers addressed in this proposal. To achieve a conservative estimate on enhanced EAP customers below 60 percent median income, Staff applied the current average Tier 1 benefit in each utility territory and assumed the maximum number of households will enroll. The resulting annual cost of participant benefits for this enhanced EAP tier is up to \$90 million statewide.

To achieve a conservative estimate on enhanced EAP customers in the moderate income tier, Staff incorporated a flat \$3 minimum monthly discount such as that already extended to low-income EAP participants, extrapolated 70 percent moderate income discounts across all moderate income enhanced

EAP participants, and assumed the maximum number of households will enroll from the moderate-income pool. The resulting annual cost of participant benefits for enhanced EAP for the moderate income household tier would be up to approximately \$45 million statewide.

To achieve an estimate on enhanced EAP customers in the 80 to 100 percent median income tier, Staff incorporated a flat \$1 minimum monthly discount, extrapolated 90 percent moderate income discounts across all 80 to 100 percent median income enhanced EAP participants, and assumed the maximum number of households will enroll. The resulting annual cost of participant benefits for enhanced EAP for the 80 to 100 percent median income household tier would be up to approximately \$9 million statewide.

Importantly, Staff anticipates actual enrollment levels would be significantly lower during initial program years. For reference, Staff estimates low income EAPs, primarily driven by automatic enrollment, reflects approximately 40 percent of eligible households statewide.²⁵ Given self-enrollment processes typically result in lower enrollment totals than when customers are automatically enrolled, Staff expects enhanced EAP enrollment would not exceed EAP enrollment levels during the pilot period. Further, Staff expects enrollment would be incongruent across the three income tiers. In particular, Staff anticipates fewer enrollments in the 80 to 100 percent tier relative to the other tiers given few would qualify for discounts above the proposed minimum. The chart below demonstrates potential budget impacts based on lower enrollment levels.

²⁵ Based on assessment of Census data and November 2024 utility EAP filings in case 14-M-0565.

*Estimated Annual EAP Budget Impact by Enrollment Levels,
Statewide*

Enhanced EAP Tier	10%	40%	100%
<60% w/ Tier 1.	\$9.04m	\$36.18m	\$90.44m
60-80% w/ \$3 min.	\$4.48m	\$17.90m	\$44.76m
60-80% w/ no min.	\$2.34m	\$9.36m	\$23.41m
80-100% w/ \$1 min.	\$0.95m	\$3.81m	\$9.51m
80-100% w/ no min.	\$0.13m	\$0.52m	\$1.29m
Total w/ \$3, \$1 min.	\$14.47m	\$57.88m	\$144.71m
Total w/ no min.	\$11.51m	\$46.06m	\$115.14m

Staff is aware of the balance that must be struck between widening the scope of eligible customers and rate impacts. The benefit needed to reach all households could increase the pool of eligible customers by as many as 1.6 million households that U.S. Census data identifies as potentially income eligible for these programs, and add to administrative costs. Absent the identification of alternative funding sources, the pool of eligible customers would entail either budget increases or reduction of benefits.

Generally, utility low-income EAP budgets are established by multiplying annual discount levels by the projected number of program participants in each Tier. Within that budget, a cap is placed upon the low-income budget of two percent of each service's revenues. Staff believes it is important to continue to maintain a budget cap in order to minimize the impact to all ratepayers. However, the current budget cap is insufficient to achieve a six percent energy burden across the low-income EAP and enhanced EAP collectively.

As shown by comparison of the tables in Appendix D, the costs of achieving a six percent energy burden already exceed the budget caps for Orange and Rockland, KEDNY, and NFG, and require costs shifts to stay under the cap by NYSEG and RG&E. To offer an affordability program to more households as required by the FY 24 Budget, and to more consistently support all customers in EAP and enhanced EAP in achieving a six percent energy burden, Staff proposes the budget cap encompassing both the current and proposed programs to be increased to three percent of revenues. Estimates on the proposed three percent budget cap by utility are provided in Appendix D.

Further, Staff proposes two options for instances when a utility identifies potential benefit reductions affected by the three percent budget cap. The Commission may be petitioned for temporary budget cap adjustments to individual utilities up to 3.5 percent based on demonstrated need.²⁶ Absent adjustments to the budget limit, discount amounts for all low-income EAP and enhanced EAP participants affected by the budget cap will collectively be adjusted in the same proportionate manner currently used in the low-income EAP.²⁷

The budget limit used in low-income EAPs will be the model for recovering funds for enhanced EAPs. Similar to the current budgeting process, the only factor causing variations to the expected expenditures would be participation levels. Any over or under recovery of these funds would be fully recovered or returned to ratepayers. Staff recommends however that the Commission provide potential flexibility for unanticipated events that might require alternate methods of

²⁶ Staff anticipates the budget cap will need to be revisited if the level of federal assistance for HEAP is dramatically reduced.

²⁷ Implementation Order, p. 39.

budgeting.

Straw Proposal Recommendations for Annual Utility Budgets

- Follow Staff's annual budget methodology currently used for low-income EAPs.
- Modify the overall program cap to three percent across low-income EAPs and enhanced EAPs.
- Proportionate downward adjustment of benefits in line with low-income EAP.
- PSC may be petitioned for temporary budget cap adjustments up to 3.5 percent.
- Subject to full reconciliation to actual costs.
- If implemented statewide in December 2025 with no minimum discount, 100 percent enrollment, and no alternate funding sources, electric utilities would require revenue increases of up to 0.34 percent overall, ranging at individual utilities from an 0.06 percent increase to a 1.22 percent increase; and gas utilities would require revenue increases of up to 0.89 percent overall, ranging from an 0.15 percent increase to a 1.72 percent increase.
- If implemented statewide in December 2025 with stated minimum discounts, 100 percent enrollment, and no alternate funding sources, electric utilities would require revenue increases of up to 0.49 percent overall, ranging at individual utilities from 0.20 percent to 1.33 percent; and gas utilities would require revenue increases of up to 1.08 percent overall, ranging from 0.26 percent to a 1.83 percent increase.
- Alternative funding sources should continue to be sought to minimize ratepayer impact.

Program Evaluation

A variety of data would be collected during the pilot period and beyond to measure the performance of the enhanced EAPs. Given the varying impacts the use of AMI and SMI may have across the state, utilities would collect anonymized geolocational customer data during the pilot period to assess the potential impact of SMI and AMI on participation rates and discounts. Utilities would also consider the feasibility and administrative burden of deploying an AMI-based program on the utility service territory. Utilities would consider U.S. census tract data or more granular area data, if available and accurately applicable to utility service territories, which are generally not easily resolvable to specific county lines. The Staff straw proposal recommends utilities issue annual reports to the Commission comparing potential enrollment impacts of using service territory-wide SMI, service territory-wide AMI, and a hybrid approach in which SMI and AMI are used in targeted fashion.

Moreover, a key concern underlying ratepayer support for moderate-income programs is controlling utility arrearages and terminations. Collection cost reductions benefit all customers, and an effective moderate-income program may reduce such costs. Utilities already report on low-income customer collection data, such as the number of customers in arrears, the dollar amount of arrears, the number of deferred payment agreements negotiated, those in default, and those renegotiated, and the number of terminations. Tracking moderate-income data through the same method as low-income customer data would furnish valuable information regarding changes in their status over time and comparisons to low-income EAP and non-participating customers.

The Straw Proposal therefore recommends that utilities incorporate enhanced EAP customers in existing tracking and reporting of key collection activity data. A representative collection activity report is attached to this report as Appendix E. Further comments are invited on the categories of data from these reports to be measured and reported separately for enhanced EAP customers.

Straw Proposal Recommendations for Program Evaluation

- More data is necessary to determine whether the use of AMI, or alternatively SMI, in determining enhanced EAP eligibility and discount amounts is in the public interest. Utilities would collect anonymized geolocational customer data during the pilot period to assess the potential impact of SMI and AMI on participation rates and discounts.
- A substantial amount of collection activity data is already reported by the utilities for low-income customers. Utilities would begin tracking and reporting the same key collection activity data for the subset of moderate-income customers.

Coordination with Other Programs

While the straw proposal does not seek implementation of data matching arrangements during the pilot period, Staff envisions data matching opportunities would be leveraged to verify eligibility and automatically enroll customers in enhanced EAP. Staff will continue to explore data match opportunities for partially overlapping programs, most notably EPIC with the DOH and OTDA, and low- to moderate-income energy programs with NYSERDA. Further, Staff would continue engaging with the Department of Tax and Finance to determine whether a

more comprehensive verification and enrollment methods may be available for all eligible customers statewide.

Straw Proposal Recommendations for Coordination with Other Programs

- Staff would continue to assess opportunities to leverage programs with overlapping eligibility.

CONCLUSION

As conveyed by Governor Hochul, there is a keen interest across the state in bringing down energy costs for all New Yorkers.²⁸ Home energy costs pose a large burden to low-income, and some moderate-income, New Yorkers today. High home energy costs threaten not only the ability to retain access to energy services, but also threaten access to housing, food, medical care and other necessities of life, that may become unaffordable for low- or moderate-income residents.

In the spirit of these goals, Staff submits this white paper supporting the advancement of moderate-income energy affordability programs for party comment and Commission consideration. It is likely that no party will agree with all of the recommendations contained in the Straw Proposal, and we expect that the Straw Proposal can and will be improved by the further party comment and review that will follow. We look forward to continuing that examination.

²⁸ Keeping Money in Your Pockets: Governor Hochul Takes on Sky-High Utility Costs and Demands Accountability for New York Ratepayers. February 11, 2025.

<https://www.governor.ny.gov/news/keeping-money-your-pockets-governor-hochul-takes-sky-high-utility-costs-and-demands>.

Appendix A

**CASE 14-M-0565 - Proceeding on Motion of the Commission to
Examine Programs to Address Energy
Affordability for Low Income Utility
Customers**

Initial Stakeholder Comments

PULP "Ballpark" Estimate Of Universe Of Households Potentially Eligible For EEAP

Households Potentially Eligible For EAP Or EEAP (<60% SMI), Based On Latest ACS Data (2023):	2,187,972
Maximum EEAP Estimate Based On Estimates of Households Less Likely To Have Received HEAP And <u>Limited</u> ACS Data On Households Not Receiving Medicaid, SNAP, SSI Or PA:	435,643
Less:	
Estimate of Submetered Households (DPS FOIL)	-38,130
<u>Conservative</u> Estimate Of Undercount (Medicaid, FS, SSI and PA) ***	-151,522
Adjusted Estimate Of Universe Of <60% SMI Households Potentially Eligible For EEAP:	<hr/> 245,991 <hr/>

*** Academic literature strongly suggests that respondents to ACS surveys under-report their receipt of each of these forms of assistance. Statewide OTDA caseload statistics corroborate these findings by consistently reflecting much higher enrollment, particularly in Medicaid. It would not be unreasonable to estimate that under-reporting is double PULP's conservative estimate, which would reduce the universe of <60% SMI households potentially eligible for EEAP to below 100,000.

Comments provided by the Joint Utilities

The Joint Utilities (Central Hudson, Con Edison, National Fuel, National Grid, NYSEG, RG&E, and Orange & Rockland Utilities) and PSEG Long Island, as agent for and service provider to LIPA (collectively, the utilities), thank the Department of Public Service (DPS) Staff for the opportunity to provide initial comment on the draft Enhanced Energy Affordability Policy (EAP) Whitepaper (the “Whitepaper”) prepared by Staff in Case 14-M-0565. The following comments represent the utilities’ comments based on an initial review of the Whitepaper. The utilities will continue to review the Whitepaper and provide additional comments through the SAPA process following Commission issuance of the Whitepaper. The utilities look forward to continuing to work with DPS Staff and stakeholders through the EAP Working Group.

Overall Support for the Enhanced EAP Effort:

- The utilities are broadly supportive of the effort to develop an Enhanced EAP program. There are customers who are not eligible for the existing EAP program due to eligibility requirements, and customers whose household incomes are somewhat above the income targets for the existing EAP program but who are nevertheless economically challenged in making ends meet. Because of this broad support for the effort, the utilities have been collaborating in the working group effort from the inception. The details are important to get right, and we also need to consider this work and how it can impact other important policies and mandates, such as having just and reasonable rates for all customers and continuing to encourage conservation. The utilities’ comments here largely focus on those important details and their impact on other important state policies.

Program Integration into EAP & Eligibility:

- The utilities support use of the same methodology as the current EAP to calculate discounts for the Enhanced EAP program as described on p. 17 of the Whitepaper (*i.e.*, calculating discounts for each tier and for the four heating configuration groups in the current EAP program and applying this discount uniformly to the bills of eligible customers in each group).
- The second to last principle on p. 16, which reads “Programs must achieve a 6% energy burden for recipients” should be revised to state that “Programs should be designed to achieve a 6% energy burden” to reflect the fact that the program does not provide a customer specific guarantee.
- The utilities recommend further discussion on how customers who are enrolled through the Enhanced EAP program but whose income is at or below 60% of State Median Income (SMI) or Area Medium Income (AMI) in New York City are treated to avoid unnecessary discrepancies between their benefits and the beneficiaries of current EAP Tier 1 discount recipients.

Enrollment:

- The utilities seek clarity from Staff on what is meant by a “clearinghouse” (p. 16). Once defined, utilities can verify if they have existing contracts with clearinghouses, and whether enrollment in the Enhanced EAP can be leveraged as part of those contracts. The process of soliciting proposals from and contracting with a clearinghouse may need to be included in the timeline to

launch the program. Further discussion is recommended on the specific role of a clearinghouse in this process.

- The utilities recommend requiring the utilities to report on the cost to verify eligible customers as opposed to requiring the utilities to conduct a cost benefit analysis of the program (p. 22).

Program Budget & Benefit Level:

- The utilities support raising the program budget cap to mitigate barriers to expanding the EAP, namely, the fact that many utilities' current program budgets are approaching or have exceeded the 2% cap on program funding (Appendix D). The utilities recommend further review of the budget mechanism, however: under the proposed budget process, if the anticipated annual program budget grew to exceed the new program cap, utilities may need to reduce discounts for both moderate- and low-income customers (p. 29). The utilities recommend implementing controls to prevent this program expansion from eroding bill assistance available to low-income customers, especially given increasing uncertainty around the continued availability of federal funding for programs like the Home Energy Assistance Program (HEAP).
- A key benefit of the budget as proposed on pp. 28-30 would be to relieve budget constraints already impacting some utilities' programs that have reached the current 2% budget cap; the utilities support a budget framework that achieves this goal.
- DPS noted that the budget estimate currently includes customers in the 60-to-80% of SMI or AMI tier (p. 28); the utilities agree that further information is needed to fully understand the potential impact to EAP program budgets, particularly as it relates to customers below 60% of SMI or AMI who would be eligible for the EAP program Tier 1 benefit, as these customers' participation at this benefit level is likely to have a sizable impact on the budget.
- The utilities support DPS's proposal to use insights from the pilot period to further refine benefit levels in the future (p. 23).

Resources:

- The utilities request that a Commission order provide the utilities with cost recovery for incremental bill discounts not currently reflected in rates and for work required to launch and administer this program, including but not limited to clearinghouse income verification services, backend billing system upgrades, marketing and outreach, data collection for program evaluation, and addressing customer inquiries.¹

Timeline:

- A launch date of December 1, 2025 is not feasible. With over one million customers expected to be eligible statewide, utilities will need to leverage automation to administer this program from its inception. This means that the utilities will need to build and test system upgrades, may need to select and contract with a clearinghouse, perform cost analyses, create application and outreach processes, and set up data collection criteria and protocols – all before the program

¹ PSEG Long Island notes that LIPA's rates are established by LIPA's Board of Trustees rather than by Commission order.

launches, but only after the program design has been finalized and approved via Commission order.

- The utilities plan to provide further comment on program design with timeline in mind, considering both time- and cost efficiencies as well as customer experience, robust data collection for program evaluation, and the need for scalability given the large size of the eligible customer pool and eventual program design (e.g., monthly vs. annual bill discounts).
- PSEG Long Island notes that to the extent changes are needed to the LIPA Tariff in order to implement this program, such changes would be subject to SAPA notice and comment procedures as well a LIPA Board approval, which may impact PSEG Long Island's implementation timeline.

Appendix B

	Program Name	Administrator	Target Population	Enrollment period	Recertification Period	How to Apply	Eligibility
1	Access NYC	NYC Mayor's Office for Economic Opportunity	Immigrants, people with disabilities, low-income, children, families, job seekers, NYCHA recipients, seniors, students, veterans, and homeless.	Depends on the linked program. Many programs are hyperlinks but the Access NYC website offers step by step instructions	Depends on the linked programs.	Follow instructions to apply on the Access NYC site or follow links provided to the application on the provider's website.	Depends on the linked programs.
2	ID NYC	City of New York	Homeless, Youth, Undocumented immigrants, formerly incarcerated, any who have difficulty obtaining government ID	Open enrollment.	After expiration of the ID card, December 31st of that same year.	Pop-up centers and Online application. Reasonable accommodations exist for those unable to travel to an enrollment center. Language access for 35 languages and sign language interpretation available.	At least 10 years of age, New York City resident with valid proof of identity and residency.
3	EPIC	NYSDOH	Senior citizens covered by Medicare	Any time during the year. Subsequently, enrollees will be given a "Special Enrollment Period" to join a Medicare Part D drug plan.	EPIC sends a letter to recipients when they are required to renew EPIC coverage.	Online, mailed, or printed application form. EPIC has a toll-free hotline to request an application.	NYS resident age 65 or older, Annual income below \$75,000 if single, \$100,000 if married, enrolled or eligible to enroll in Medicare Part D, not receiving full Medicaid benefits, if part of a Medicare Advantage HMO, the HMO must have Part D drug coverage, Fee Plan - income requirement up to \$20,000 if single or \$26,000 if married, Deductible Plan - income requirement \$20,001 to \$75,000 if single or \$26,001 to \$100,000 if married.
4	NYC "fair fares"	NYC HRA	Income eligible NYC residents.	Open enrollment.	One year after application is approved. Need to find how long the recertification period is.	Online via ACCESS HRA mobile app, online, or call 311 for help applying. In person locations at five sites in New York City.	Between the ages of 18 and 64, NYC Resident, currently receiving or eligible for a discounted MetroCard through other NYC programs except Access-A-Ride customers, monthly income limits based on household size.
5	HCR Program (SHARS database)	Not able to find information in public facing documents.	Not able to find information in public facing documents.	Not able to find information in public facing documents.	Not able to find information in public facing documents.	Not able to find information in public facing documents.	Not able to find information in public facing documents.
6	School Lunch program	New York State Department of Education	High Poverty Area schools and local educational agencies.	Beginning of the school year or when a child is identified by the school the direct certified matching processes as free eligible based on SNAP or Medicaid.	Carryover eligibility during the first 30 days of the school year uses the prior year eligibility until a new eligibility determination is made for the current school year.	DCMP matching process or application submitted at any time during the school year. No application is required if the family submits proof of TANF or SNAP benefits to the school provided by the local DSS.	Free - Income up to 130% of poverty level. Reduced - Income up to 185% of poverty level. Full Price - paid by family - Income over 185% of poverty level.

	Program Name	Administrator	Target Population	Enrollment period	Recertification Period	How to Apply	Eligibility
7	STAR rebates	New York State Department of Taxation and Finance	Homeowners earning under \$500,000	Open enrollment when the homeowner's house becomes their primary residence	Automatic review of eligibility for the credit every year for as long as the homeowner owns and occupies the home.	Online application	Basic STAR - Primary residence of the owner, no age restriction, \$500,000 or less for the STAR credit, \$250,000 or less for the STAR exemption, Income exemptions are for the combined owner and spouses who reside at the property. Enhanced STAR - The primary residence for at least one age-eligible owner, 65 or older as of December 31 of the year of the exemption, 2023 benefits: \$93,200 or less, 2024 benefits: \$98,700 or less, The income limit applies to the combined incomes of all owners and any owner's spouse who resides at the property.
8	Other tax rebate programs (EITC)	IRS/NYS DTF	US Citizen or resident alien who are working and meet income guidelines.	Tax filing periods	Annual when filing taxes.	Filing taxes	US citizen or resident alien, Eaned income under \$59,187, valid Social Security Number, investment income under \$10,300 before TY 2022, not filing Form 2555 - Foreign Earned Income. There are special qualifying rules for clergy members, military members, and taxpayers and their relatives with disabilities.
9	Child Tax Credit and the Credit for Other Dependents, Child and Dependent Care Credit, Education Credits	IRS/NYS DTF	US Citizen or resident alien who are working and meet income guidelines.	Tax filing periods	Annual when filing taxes.	Filing taxes	Income and household requirements, US residency or citizenship.
10	Affordable housing assistance agencies and programs	HUD, HEAP, NYS OFTA, LTCOP, DHCR, OMH, OPWDD, NYAIL, ADA, NYS Justice Center, Medicaid, HRA, HPD, HDC, DSS, Legal Aid Society, FEHO, FHAP, FHIP.	Income eligible renters and home buyers.	Varies. Limited enrollment periods are common in these programs as well as on demand enrollment such as Section 8 housing.	Annual recertifications are common with income eligibility screenings.	Online application, in office applications, phone hotlines.	Varies. Age restrictions, income eligibility, disability status.
11	Orange County Fuel Fund	Orange County Fuel Fund	Those living on a fixed income and reluctant to utilize HEAP and similar programs.	November 1, 2022 to March 15, 2023. Or when funds are exhausted.	November 1, 2022 to March 15, 2023. Or when funds are exhausted.	Online, mail, phone.	LMI residents of Orange County, New York, income eligibility based on HEAP household income limits other housing income limits, household savings limits of \$60,00 or less, must have government identification.
12	National Grid's Hope and Warmth Energy Fund	HeartShare Human Services of New York	HEAP eligible households	Open Enrollment	Not provided	Contact by phone or in office.	Have an active NG heating account in their name, meet NYSEDA's AHP with Energy Star income guidelines, reside in a residential home/apartment, valid NG disconnect notice, an overdue balance of more than \$200.
13	Central Hudson's Good Neighbor Fund	Central Hudson	Customers at risk of termination or financial hardship.	As needed.	Customers can ask for three grants in a five year period.	Contact by phone.	Must have a hardship such as a final termination notice; customer must apply for all other available assistance first; customer must not have had three Good Neighbor grants in the past five years.

	Program Name	Administrator	Target Population	Enrollment period	Recertification Period	How to Apply	Eligibility
14	Con Edison's EnergyShare program	HeartShare Human Services of New York	Residential customers who are eligible for government financial assistance and/or meet federal HEAP income guidelines	As needed.	Annually	Contact by phone or in office.	Applicants must be HEAP income eligible and provide proof of one good faith payment in the last twelve months along with proof of ID and income for all household members. Applicants no longer need a disconnection notice on their Con Edison accounts.
15	HPD housing Program	NYC HPD	Low-income, DAC, property owners, disabled tenants/homeowners, elderly tenants/homeowners.	Depends on the programs. Section 8 enrollment period for NYC is closed and can be closed for many years. SCRIE has open enrollment.	Section 8 has annual recertifications. SCRIE has recertification form every two years	Application currently closed.	Income limits based on household size, homeless households must have a homeless shelter as a primary nighttime residence, at least one member of the household must meet documentation requirements for citizenship or eligible immigration status, social security numbers must exist for all family members who can claim citizenship or immigration status, certain restrictions on criminal conviction history.
16	Section 8	HUD	Low-income households seeking housing	Open but subject to closed lists depending on demand and availability of housing and funds. Local Public Housing Agencies coordinate the lists with HUD.	Annual	Local Public Assistance Agencies have their own procedures. Walk in offices are located throughout the state. Phone numbers are available for inquiries as well as online fact sheets.	Annual Gross Income may not exceed 50% of AMI median income. Limited to U.S. citizens and eligible immigrants. 75% of vouchers must go to those whose incomes do not exceed 30% of AMI. Income and asset information is collected by the PHA to verify family income, assets, and family composition. Verification involves employer and bank records.
17	Assisted Home Performance	NYSERDA	Residents under 60% AMI	Not provided	not provided	Complete an online application or print and mail the application	households below 80% AMI with more offerings for those under 60% AMI. Single Family home. Participation in a utility assistance program.

	Program Name	Administrator	Target Population	Enrollment period	Recertification Period	How to Apply	Eligibility
18	ERAP	OTDA	Income at or below 80% AMI	Closed January 20 80%-120% AMI Closed Feb 14	Up to 12 months of rental arrears payments	OPT IN for utility customers: Must have government ID, proof of rental amount and residency, Proof of income Copy of a gas or electric bill. Landlords: W-9 tax form, executed lease documentation of rent due, Banking information	Accumulated Rental Arrears; Income is at or below 80% of AMI; received unemployment benefits or experienced a reduction in income or financial hardship rerealted to COVID-19; Must be at risk of homelessness or housing instability.
19	Affordable Connectivity Program (ACP)	FCC	Broadband customers under 200% Federal Poverty Income Limit	Open enrollment		Apply with service provider	At or below 200% of federal poverty guidelines OR, Pell Grant recipient during the current award year, meets the eligibility criteria for a participating provider's existing low-income internet program (Free or reduced lunch program, SNAP, Medicaid, Section 8, PBRA, Section 202, Section 811, Public Housing, Affordable Housing Programs for American Indians, Alaska Natives or Native Hawaiians, SSI, WIC, Veterans Pension or Survivor Benefits, Lifeline, Bureau of Indian Affairs General Assistance, Tribal TANF, Food Distribution Program on Indian Reservations, Tribal Head Start
20	SCRIE	HPD	Senior Citizens who live in Mitchell-Lama developments				Be head of household, combined household income \$50,000 or less, spend more than one third of income on rent or maintenance, AND be at least 62 years old, Mitchell-Lama household, Redevelopment Company development, Federally-assisted 213 co-op OR HDFC shareholder
21	DRIE						
22	EmPower Plus	NYSERDA					
23	Phase 2 Data Connections						

Continuation of Program Matrix

	Program Name	Privacy Scope	Program Link	Notes
1	Access NYC	The information shared for purposes of public benefits screening will be anonymous and can be shared with City agencies to improve access to benefits and programs. Otherwise complies with HIPAA privacy and Security rules.	http://nyc.gov/accessnyc	Find help in NYC with food, money, housing, work, and apply for benefits.
2	ID NYC	Local Law 35 of 2014, the City does not collect immigration status per Executive Orders 34 and 41. Only IDNYC and HRA staff directly involved in program administration have access to IDNYC databases. Local Law 35 explicitly prevents IDNYC from sharing cardholder data unless required by warrant or subpoena.	https://www.nyc.gov/site/idnyc/index.page	Free municipal identification card.
3	EPIC	Covered under Medicaid protection laws	https://www.health.ny.gov/health_care/epic/ Questions: nysdohepic@magellanhealth.com	Helps to pay Medicare Part D plan premiums
4	NYC "fair fares"	Rules of the City of New York Title 68, § 12-07. DSS/HRA privacy rules.	https://www.nyc.gov/site/fairfares/index.page	Half Price public transportation in NYC.
5	HCR Program (SHARS database)	Not able to find information in public facing documents.	Not able to find information in public facing documents.	Not able to find information in public facing documents.
6	School Lunch program	No child may be identified as a free or reduced-price student. 42 USC 1751 states disclosure of participation in school nutrition programs requires parental consent. LEA release of information is discretionary. MOU may be required to disclose any information and is strongly encouraged. Aggregate information should be disclosed in lieu of information that identifies children. 42 USC 1758(b)(c) Section 9(b)(6) outlines the restrictions on the disclosure and use of information obtained from an application for free and reduced meals.	https://www.cn.nysed.gov/	Free or reduced meal program.

	Program Name	Privacy Scope	Program Link	Notes
7	STAR rebates	New York State Real Property Tax Law, subdivision 14 of section 425, and in the New York State Tax Law, in section 171-u, as well as 42 USC 405(c)(2)(C)(i).	https://www.tax.ny.gov/pit/property/star/	Credit payments issued by NYSDTF to homoeowners.
8	Other tax rebate programs (EITC)	The Commissioner of Taxation and Finance may collect and maintain personal information pursuant to the New York State Tax Law, including but not limited to, sections 5-a, 171, 171-a, 287, 308, 429, 475, 505, 697, 1096, 1142, and 1415 of that Law; and may require disclosure of social security numbers pursuant to 42 USC 405(c)(2)(C)(i).	https://www.irs.gov/credits-deductions/individuals/earned-income-tax-credit-eitc https://www.tax.ny.gov/pit/credits/earned_income_credit.htm	Disclosure of information on tax forms is tightly protected.
9	Child Tax Credit and the Credit for Other Dependents, Child and Dependent Care Credit, Education Credits	The Commissioner of Taxation and Finance may collect and maintain personal information pursuant to the New York State Tax Law, including but not limited to, sections 5-a, 171, 171-a, 287, 308, 429, 475, 505, 697, 1096, 1142, and 1415 of that Law; and may require disclosure of social security numbers pursuant to 42 USC 405(c)(2)(C)(i).	https://www.irs.gov/credits-deductions/individuals/child-and-dependent-care-credit-information https://www.irs.gov/credits-deductions/individuals/education-credits-aotc-lle	Disclosure of information on tax forms is tightly protected.
10	Affordable housing assistance agencies and programs	Many Programs follow New York Personal Privacy Protection Law (PPPL). 'Prohibits an agency from collecting personal information, unless it is "relevant and necessary" to a purpose of the agency that must be accomplished by law.' 'protects you against disclosures of personal information without your consent, except in circumstances specified in the law; and forbids state agencies from maintaining "secret" data banks containing personal information.'	https://nyhousingsearch.gov/Resources.html	Provides links to resources for varying housing programs.
11	Orange County Fuel Fund	Not provided.	http://www.ocfuelfund.org/	
12	National Grid's Hope and Warmth Energy Fund	Does provide for some disclosure with opt out options by contacting the Company	heartshare.org	
13	Central Hudson's Good Neighbor Fund	File matching can be provided by CH as determined by the Company and JU.	https://www.cenhud.com/en/account-resources/assistance-programs/	Last resort grant to help pay energy bills.

	Program Name	Privacy Scope	Program Link	Notes
14	Con Edison's EnergyShare program		heartshare.org	\$200 grant
15	HPD housing Program	<p>HUD is authorized to collect this information by the U.S. Housing Act of 1937 (42 U.S.C. 1437 et. seq.), Title VI of the Civil Rights Act of 1964 (42 U.S.C. 2000d), and by the Fair Housing Act (42 U.S.C. 3601-19). The Housing and Community Development Act of 1987 (42 U.S.C. 3543) requires applicants and participants to submit the Social Security number of each household member. Purpose: Your income and other information collected by HUD and HPD is used to determine your eligibility for Rental Subsidy assistance, the appropriate bedroom size of your voucher, and the amount that your family will pay toward rent and utilities. Other Uses: HPD uses your family income and other information to assist in managing and monitoring HUD - assisted housing programs, to protect the government's financial interest, and to verify the accuracy of the information you provide. This information may be released to appropriate federal, state, and local agencies, when relevant, and to civil, criminal, or regulatory investigators and prosecutors. However, the information will not be otherwise disclosed or released outside of HUD or HPD, except as permitted or required by law.</p>	https://www.nyc.gov/site/hpd/services-and-information/section-8.page	
16	Section 8	24 CFR Part 982	https://www.hud.gov/topics/housing_choice_voucher_program_section_8#hcv03	Waiting lists can be long or closed for many years.
17	Assisted Home Performance	<p>NYSERDA may collect or disclose <i>personal information</i> without consent if the collection or disclosure is: (1) necessary to perform NYSERDA's statutory duties, or necessary for NYSERDA to operate a program authorized by law, or authorized by state or federal statute or regulation; (2) made pursuant to a court order or by law; (3) for the purpose of validating the identity of the <i>user</i>; or (4) of information to be used solely for statistical purposes that is in a form that cannot be used to identify any particular person</p>	https://www.nyserd.ny.gov/All-Programs/Residential-Financing-Programs/Assisted-Home-Performance-with-ENERGY-STAR	

	Program Name	Privacy Scope	Program Link	Notes
18	ERAP		https://otda.ny.gov/programs/emergency-rental-assistance/	
19	Affordable Connectivity Program (ACP)		https://www.fcc.gov/acp	
20	SCRIE		https://www.nyc.gov/site/hpd/services-and-information/scrie-drie.page	
21	DRIE			
22	EmPower Plus			
23	Phase 2 Data Connections			

Appendix C

Enhanced EAP Energy Burden, Discount, and Budget ModelingEnergy Burden Calculations³⁰

NY State median income - household of 2	60% of SMI	70% of SMI	80% of SMI	90% of SMI	100% of SMI
\$79,557	\$47,734.20	\$55,689.90	\$63,645.60	\$71,601.30	\$79,557.00
Monthly SMI	\$3,977.85	\$4,640.83	\$5,303.80	\$5,966.78	\$6,629.75
6% Energy Burden	\$238.67	\$278.45	\$318.23	\$358.01	\$397.79
3% Energy Burden	\$119.34	\$139.22	\$159.11	\$179.00	\$198.89
NYC area median income - household of 2	60% of AMI	70% of AMI	80% of AMI	90% of AMI	100% of AMI
\$113,000	\$67,800.00	\$79,100.00	\$90,400.00	\$101,700.00	\$113,000.00
Monthly AMI	\$5,650.00	\$6,591.67	\$7,533.33	\$8,475.00	\$9,416.67
6% Energy Burden	\$339.00	\$395.50	\$452.00	\$508.50	\$565.00
3% Energy Burden	\$169.50	\$197.75	\$226.00	\$254.25	\$282.50

³⁰ Based on the 2022 American Community Survey, see: <https://data.census.gov/table/ACSST1Y2022.S1903?t=Income%20and%20Poverty&g=040XX00US36> and U.S. Department of Housing and Urban Development data [https://www.nyc.gov/site/hpd/services-and-information/area-median-income.page#:~:text=Area%20Median%20Income%20\(AMI\),-The%20AMI%20for&text=The%202023%20AMI%20for%20the,family%20\(100%25%20AMI\)](https://www.nyc.gov/site/hpd/services-and-information/area-median-income.page#:~:text=Area%20Median%20Income%20(AMI),-The%20AMI%20for&text=The%202023%20AMI%20for%20the,family%20(100%25%20AMI)) (last accessed February 28, 2025).

Utility Low Income Usage and Average Bill (as proxy for EEAP Usage and Average Bill)

Central Hudson - Utility Low Income Usage and Average Bill				
		Usage (kWh, Th, ccf)	Average Monthly Bill* (Undiscounted \$)	Adjusted Bill (Grossed up by 10%)
Gas	Heat	52	\$121.82	\$134.00
	Non-Heat	22	\$64.61	\$71.07
Electric	Heat	896	\$192.24	\$211.46
	Non-Heat	606	\$136.49	\$150.14

Con Edison - Utility Low Income Usage and Average Bill				
		Usage (kWh, Th, ccf)	Average Monthly Bill* (Undiscounted \$)	Adjusted Bill (Grossed up by 10%)
Gas	Heat	81	\$232.00	\$255.20
	Non-Heat	6	\$47.00	\$51.70
Electric	Heat	671	\$235.00	\$258.50
	Non-Heat	359	\$136.00	\$149.60

NiMo - Utility Low Income Usage and Average Bill				
		Usage (kWh, Th, ccf)	Average Monthly Bill* (Undiscounted \$)	Adjusted Bill (Grossed up by 10%)
Gas	Heat	75	\$87.41	\$96.15
	Non-Heat	12	\$34.07	\$37.48
Electric	Heat	741	\$124.72	\$137.19
	Non-Heat	594	\$103.61	\$113.97

NYSEG - Utility Low Income Usage and Average Bill				
		Usage (kWh, Th, ccf)	Average Monthly Bill* (Undiscounted \$)	Adjusted Bill (Grossed up by 10%)
Gas	Heat	76	\$99.60	\$109.56
	Non-Heat	26	\$47.03	\$51.73
Electric	Heat	1008	\$151.78	\$166.96
	Non-Heat	684	\$109.38	\$120.32

O&R - Utility Low Income Usage and Average Bill				
		Usage (kWh, Th, ccf)	Average Monthly Bill* (Undiscounted \$)	Adjusted Bill (Grossed up by 10%)
Gas	Heat	78	\$131.04	\$144.14
	Non-Heat	18	\$47.29	\$52.02
Electric	Heat	927	\$202.23	\$222.45
	Non-Heat	619	\$145.86	\$160.45

RG&E - Utility Low Income Usage and Average Bill				
		Usage (kWh, Th, ccf)	Average Monthly Bill* (Undiscounted \$)	Adjusted Bill (Grossed up by 10%)
Gas	Heat	82	\$83.64	\$92.00
	Non-Heat	58	\$65.09	\$71.60
Electric	Heat	825	\$130.94	\$144.03
	Non-Heat	635	\$106.35	\$116.99

KEDLI - Utility Low Income Usage and Average Bill				
		Usage (kWh, Th, ccf)	Average Monthly Bill* (Undiscounted \$)	Adjusted Bill (Grossed up by 10%)
Gas	Heat	79	\$139.34	\$153.27
	Non-Heat	10	\$41.82	\$46.00

KEDNY - Utility Low Income Usage and Average Bill				
		Usage (kWh, Th, ccf)	Average Monthly Bill* (Undiscounted \$)	Adjusted Bill (Grossed up by 10%)
Gas	Heat	84	\$154.57	\$170.03
	Non-Heat	6	\$30.41	\$33.45

PSEG-LI - Utility Low Income Usage and Average Bill				
		Usage (kWh, Th, ccf)	Average Monthly Bill* (Undiscounted \$)	Adjusted Bill (Grossed up by 10%)
Electric	Heat	896	192.21	\$211.43
	Non-Heat	654	\$160.85	\$176.94

NFG - Utility Low Income Usage and Average Bill				
		Usage (kWh, Th, ccf)	Average Monthly Bill* (Undiscounted \$)	Adjusted Bill (Grossed up by 10%)
Gas	Heat	84	\$81.20	\$89.32
	Non-Heat	28	\$39.02	\$42.92

Δ from 6% Burden

			60% SMI/AMI	70% SMI/AMI	80% SMI/AMI	90% SMI/AMI	100% SMI/AMI
Central Hudson	Gas	Heat	\$14.67	-\$5.22	-\$25.11	-\$45.00	-\$64.89
		Non-Heat	-\$48.26	-\$68.15	-\$88.04	-\$107.93	-\$127.82
	Electric	Heat	-\$27.21	-\$66.99	-\$106.76	-\$146.54	-\$186.32
		Non-Heat	\$30.80	\$10.91	-\$8.97	-\$28.86	-\$48.75
	Avg Benefit		\$21.57	\$6.30	\$0.00	\$0.00	\$0.00
Con Edison	Gas	Heat	\$85.70	\$57.45	\$29.20	\$0.95	-\$27.30
		Non-Heat	-\$117.80	-\$146.05	-\$174.30	-\$202.55	-\$230.80
	Electric	Heat	-\$80.50	-\$137.00	-\$193.50	-\$250.00	-\$306.50
		Non-Heat	-\$19.90	-\$48.15	-\$76.40	-\$104.65	-\$132.90
	Avg Benefit		\$3.54	\$2.37	\$1.21	\$0.04	\$0.00
NiMo	Gas	Heat	-\$23.18	-\$43.07	-\$62.96	-\$82.85	-\$102.74
		Non-Heat	-\$81.86	-\$101.75	-\$121.64	-\$141.53	-\$161.42
	Electric	Heat	-\$101.48	-\$141.26	-\$181.04	-\$220.81	-\$260.59
		Non-Heat	-\$5.36	-\$25.25	-\$45.14	-\$65.03	-\$84.92
	Avg Benefit		\$0.00	\$0.00	\$0.00	\$0.00	\$0.00
NYSEG	Gas	Heat	-\$9.78	-\$29.66	-\$49.55	-\$69.44	-\$89.33
		Non-Heat	-\$67.60	-\$87.49	-\$107.38	-\$127.27	-\$147.16
	Electric	Heat	-\$71.71	-\$111.49	-\$151.27	-\$191.05	-\$230.83
		Non-Heat	\$0.98	-\$18.91	-\$38.80	-\$58.69	-\$78.57
	Avg Benefit		\$0.57	\$0.00	\$0.00	\$0.00	\$0.00
O&R	Gas	Heat	\$24.81	\$4.92	-\$14.97	-\$34.86	-\$54.75
		Non-Heat	-\$67.32	-\$87.21	-\$107.10	-\$126.98	-\$146.87
	Electric	Heat	-\$16.22	-\$56.00	-\$95.78	-\$135.55	-\$175.33
		Non-Heat	\$41.11	\$21.22	\$1.33	-\$18.56	-\$38.45
	Avg Benefit		\$33.02	\$13.72	\$0.73	\$0.00	\$0.00
RG&E	Gas	Heat	-\$27.33	-\$47.22	-\$67.11	-\$87.00	-\$106.89
		Non-Heat	-\$47.74	-\$67.63	-\$87.52	-\$107.40	-\$127.29
	Electric	Heat	-\$94.64	-\$134.42	-\$174.19	-\$213.97	-\$253.75
		Non-Heat	-\$2.35	-\$22.24	-\$42.13	-\$62.02	-\$81.91
	Avg Benefit		\$0.00	\$0.00	\$0.00	\$0.00	\$0.00

			60% SMI/AMI	70% SMI/AMI	80% SMI/AMI	90% SMI/AMI	100% SMI/AMI
KEDLI	Gas	Heat	\$33.94	\$14.05	-\$5.84	-\$25.73	-\$45.62
		Non-Heat	-\$73.33	-\$93.22	-\$113.11	-\$133.00	-\$152.89
	Avg Benefit		\$30.47	\$12.61	\$0.00	\$0.00	\$0.00
KEDNY	Gas	Heat	\$0.53	-\$27.72	-\$55.97	-\$84.22	-\$112.47
		Non-Heat	-\$136.05	-\$164.30	-\$192.55	-\$220.80	-\$249.05
	Avg Benefit		\$0.24	\$0.00	\$0.00	\$0.00	\$0.00
PSEG	Electric	Heat	\$92.10	\$72.21	\$52.32	\$32.43	\$12.54
		Non-Heat	\$57.60	\$37.71	\$17.82	-\$2.07	-\$21.96
	Avg Benefit		\$61.57	\$41.68	\$21.79	\$3.73	\$1.44
NFG	Gas	Heat	-\$30.02	-\$49.90	-\$69.79	-\$89.68	-\$109.57
		Non-Heat	-\$76.41	-\$96.30	-\$116.19	-\$136.08	-\$155.97
	Avg Benefit		\$0.00	\$0.00	\$0.00	\$0.00	\$0.00

Estimated Maximum Monthly Discounts Using Flat Minimum Benefits

			60% SMI/AMI	70% SMI/AMI	80% SMI/AMI	90% SMI/AMI	100% SMI/AMI
Central Hudson	Gas	Heat	\$14.67	\$3.00	\$3.00	\$1.00	\$1.00
		Non-Heat	\$3.00	\$3.00	\$3.00	\$1.00	\$1.00
	Electric	Heat	\$3.00	\$3.00	\$3.00	\$1.00	\$1.00
		Non-Heat	\$30.80	\$10.91	\$3.00	\$1.00	\$1.00
Con Edison	Gas	Heat	\$85.70	\$57.45	\$29.20	\$1.00	\$1.00
		Non-Heat	\$3.00	\$3.00	\$3.00	\$1.00	\$1.00
	Electric	Heat	\$3.00	\$3.00	\$3.00	\$1.00	\$1.00
		Non-Heat	\$3.00	\$3.00	\$3.00	\$1.00	\$1.00
NiMo	Gas	Heat	\$3.00	\$3.00	\$3.00	\$1.00	\$1.00
		Non-Heat	\$3.00	\$3.00	\$3.00	\$1.00	\$1.00
	Electric	Heat	\$3.00	\$3.00	\$3.00	\$1.00	\$1.00
		Non-Heat	\$3.00	\$3.00	\$3.00	\$1.00	\$1.00
NYSEG	Gas	Heat	\$3.00	\$3.00	\$3.00	\$1.00	\$1.00
		Non-Heat	\$3.00	\$3.00	\$3.00	\$1.00	\$1.00
	Electric	Heat	\$3.00	\$3.00	\$3.00	\$1.00	\$1.00
		Non-Heat	\$3.00	\$3.00	\$3.00	\$1.00	\$1.00
O&R	Gas	Heat	\$24.81	\$4.92	\$3.00	\$1.00	\$1.00
		Non-Heat	\$3.00	\$3.00	\$3.00	\$1.00	\$1.00
	Electric	Heat	\$3.00	\$3.00	\$3.00	\$1.00	\$1.00
		Non-Heat	\$41.11	\$21.22	\$3.00	\$1.00	\$1.00
RG&E	Gas	Heat	\$3.00	\$3.00	\$3.00	\$1.00	\$1.00
		Non-Heat	\$3.00	\$3.00	\$3.00	\$1.00	\$1.00
	Electric	Heat	\$3.00	\$3.00	\$3.00	\$1.00	\$1.00
		Non-Heat	\$3.00	\$3.00	\$3.00	\$1.00	\$1.00
KEDLI	Gas	Heat	\$33.94	\$14.05	\$3.00	\$1.00	\$1.00
		Non-Heat	\$3.00	\$3.00	\$3.00	\$1.00	\$1.00
	Electric	Heat					
		Non-Heat					

			60% SMI/AMI	70% SMI/AMI	80% SMI/AMI	90% SMI/AMI	100% SMI/AMI
KEDNY	Gas	Heat	\$3.00	\$3.00	\$3.00	\$1.00	\$1.00
		Non-Heat	\$3.00	\$3.00	\$3.00	\$1.00	\$1.00
	Electric	Heat					
		Non-Heat					
PSEG	Gas	Heat					
		Non-Heat					
	Electric	Heat	\$92.10	\$72.21	\$52.32	\$32.43	\$12.54
		Non-Heat	\$57.60	\$37.71	\$17.82	\$1.00	\$1.00
NFG	Gas	Heat	\$3.00	\$3.00	\$3.00	\$1.00	\$1.00
		Non-Heat	\$3.00	\$3.00	\$3.00	\$1.00	\$1.00
	Electric	Heat					
		Non-Heat					

Estimated Maximum Program Costs (Monthly): 60-80% and 80-100% Tiers

			60-80% SMI/AMI w/\$3 min	80-100% SMI/AMI w/\$1 min	60-80% SMI/AMI w/no min	80-100% SMI/AMI w/no min
Central Hudson	Gas	Heat	\$4,614	\$1,656	\$0	\$0
		Non-Heat	\$344	\$124	\$0	\$0
	Electric	Heat	\$2,600	\$933	\$0	\$0
		Non-Heat	\$37,603	\$3,710	\$37,603	\$0
Con Edison	Gas	Heat	\$664,875	\$12,463	\$664,875	\$11,840
		Non-Heat	\$155,745	\$55,908	\$0	\$0
	Electric	Heat	\$4,695	\$1,685	\$0	\$0
		Non-Heat	\$645,508	\$231,721	\$0	\$0
NiMo	Gas	Heat	\$80,401	\$28,862	\$0	\$0
		Non-Heat	\$3,140	\$1,127	\$0	\$0
	Electric	Heat	\$37,537	\$13,475	\$0	\$0
		Non-Heat	\$170,676	\$61,268	\$0	\$0
NYSEG	Gas	Heat	\$48,343	\$17,354	\$0	\$0
		Non-Heat	\$955	\$343	\$0	\$0
	Electric	Heat	\$18,619	\$6,684	\$0	\$0
		Non-Heat	\$94,075	\$33,770	\$0	\$0
O&R	Gas	Heat	\$21,104	\$4,620	\$21,104	\$0
		Non-Heat	\$235	\$84	\$0	\$0
	Electric	Heat	\$675	\$242	\$0	\$0
		Non-Heat	\$118,590	\$6,018	\$118,590	\$0
RG&E	Gas	Heat	\$39,090	\$14,032	\$0	\$0
		Non-Heat	\$1,245	\$447	\$0	\$0
	Electric	Heat	\$4,080	\$1,465	\$0	\$0
		Non-Heat	\$46,006	\$16,515	\$0	\$0
KEDLI	Gas	Heat	\$115,722	\$8,870	\$115,722	\$0
		Non-Heat	\$2,816	\$1,011	\$0	\$0
	Electric	Heat				
		Non-Heat				

			60-80% SMI/AMI w/\$3 min	80-100% SMI/AMI w/\$1 min	60-80% SMI/AMI w/no min	80-100% SMI/AMI w/no min
KEDNY	Gas	Heat	\$131,254	\$47,117	\$0	\$0
		Non-Heat	\$161,684	\$58,040	\$0	\$0
	Electric	Heat				
		Non-Heat				
PSEG	Gas	Heat				
		Non-Heat				
	Electric	Heat	\$197,861	\$95,694	\$197,861	\$95,694
		Non-Heat	\$794,739	\$22,696	\$794,739	\$0
NFG	Gas	Heat	\$124,236	\$44,598	\$0	\$0
		Non-Heat	\$582	\$209	\$0	\$0
	Electric	Heat				
		Non-Heat				

Estimated Maximum Program Costs for EEAP-Eligible Households Below 60% SMI/AMI

Utility	Avg Tier 1 Benefit / yr³¹	<60% EEAP Eligible (Low)³²	Low Total	<60% EEAP eligible (High)³³	High Total
Central Hudson	\$457.56	918	\$419,878	2,257	\$1,032,861
Con Edison	\$593.88	43,111	\$25,602,811	106,049	\$62,980,610
NiMo	\$78.00	14,962	\$1,167,013	36,804	\$2,870,747
NYSEG	\$185.64	8,307	\$1,542,166	20,435	\$3,793,588
O&R	\$331.68	1,566	\$519,534	3,853	\$1,278,007
RG&E	\$53.52	4,637	\$248,172	11,407	\$610,481
KEDLI	\$352.56	1,412	\$497,676	3,472	\$1,224,238
KEDNY	\$304.80	15,022	\$4,578,852	36,954	\$11,263,564
PSEG	\$547.50	3,664	\$2,005,964	9,013	\$4,934,490
NFG	\$28.80	6,401	\$184,348	15,746	\$453,478
		100,000	\$36,766,413	245,991	\$90,442,066

³¹ Derived from November 2024 EAP workbooks filed under 14-M-0565.

³² Low estimate assumes approximately 100,000 eligible customers based on stakeholder modeling in Appendix A, proportionately allocated based on utility share of total EAP customers.

³³ High estimate assumes approximately 246,000 eligible customers based on stakeholder modeling in Appendix A, proportionately allocated based on utility share of total EAP customers.

Estimated Maximum Program Costs with Minimum Monthly Benefit (Annual)

	<60% SMI/AMI (Low)	<60% SMI/AMI (High)	60-80% SMI/AMI	80-100% SMI/AMI
100% Enrollment Total/Month	\$3,063,868	\$7,536,839	\$3,729,647	\$792,743
100% Enrollment Total/Year	\$36,766,413	\$90,442,066	\$44,755,760	\$9,512,920
40% Enrollment Total/Month	\$1,225,574	\$3,014,736	\$1,491,859	\$317,097
40% Enrollment Total/Year	\$14,706,565	\$36,176,826	\$17,902,304	\$3,805,168
10% Enrollment Total/Month	\$306,387	\$753,684	\$372,965	\$79,274
10% Enrollment Total/Year	\$3,676,641	\$9,044,207	\$4,475,576	\$951,292
Avg Monthly Discount	\$30.64	\$30.64	\$5.74	\$1.13
Avg Annual Discount	\$367.66	\$367.66	\$68.86	\$13.59

Estimated Maximum Program Costs with No Minimum Monthly Benefit (Annual)

	<60% SMI/AMI (Low)	<60% SMI/AMI (High)	60-80% SMI/AMI	80-100% SMI/AMI
100% Enrollment Total/Month	\$3,063,868	\$7,536,839	\$1,950,493	\$107,534
100% Enrollment Total/Year	\$36,766,413	\$90,442,066	\$23,405,912	\$1,290,414
40% Enrollment Total/Month	\$1,225,574	\$3,014,736	\$780,197	\$43,014
40% Enrollment Total/Year	\$14,706,565	\$36,176,826	\$9,362,365	\$516,165
10% Enrollment Total/Month	\$306,387	\$753,684	\$195,049	\$10,753
10% Enrollment Total/Year	\$3,676,641	\$9,044,207	\$2,340,591	\$129,041
Avg Monthly Discount	\$30.64	\$30.64	\$3.00	\$0.15
Avg Annual Discount	\$367.66	\$367.66	\$36.01	\$1.84

Appendix D

Estimated Impact of Program Budget Increase from 2% to 3% of Revenues³⁴

Utility	EAP Program Costs without Cap	Estimated Maximum Enhanced EAP Program Costs	Estimated Combined EAP and Enhanced EAP Program Costs	2% Program Cap	3% Program Cap	EAP Program Cost Percent of Revenues	Estimated Combined EAP and Enhanced EAP Program Cost Percent of Revenues
Central Hudson Electric	\$11,038,357	\$1,054,586	\$12,092,943	\$19,090,921	\$28,636,382	1.16%	1.27%
Central Hudson Gas	\$3,446,687	\$597,290	\$4,043,977	\$5,547,021	\$8,320,532	1.24%	1.45%
Con Edison Electric	\$213,651,178	\$42,093,604	\$255,744,782	\$245,908,995	\$368,863,492	1.74%	2.08%
Con Edison Gas	\$42,887,083	\$42,158,194	\$85,045,277	\$68,421,392	\$102,632,088	1.25%	2.48%
Niagara Mohawk Electric	\$44,142,396	\$4,830,839	\$48,973,235	\$70,595,257	\$105,892,886	1.25%	1.39%
Niagara Mohawk Gas	\$7,480,752	\$2,797,731	\$10,278,483	\$15,396,871	\$23,095,307	0.97%	1.33%
NYSEG Electric	\$37,365,934	\$3,734,574	\$41,100,508	\$42,308,154	\$63,462,231	1.77%	1.95%
NYSEG Gas	\$7,931,799	\$2,700,732	\$10,632,531	\$7,136,203	\$10,704,304	2.22%	2.98%
Orange & Rockland Electric	\$15,683,584	\$2,145,305	\$17,828,889	\$13,768,303	\$20,652,454	2.28%	2.59%
Orange & Rockland Gas	\$7,345,777	\$951,515	\$8,297,292	\$6,824,557	\$10,236,835	2.15%	2.43%
RG&E Electric	\$19,918,470	\$1,122,031	\$21,040,501	\$16,271,130	\$24,406,695	2.45%	2.59%
RG&E Gas	\$4,785,850	\$963,016	\$5,748,866	\$6,966,766	\$10,450,149	1.37%	1.65%
KEDLI Gas	\$12,910,991	\$2,765,264	\$15,676,255	\$33,551,170	\$50,326,754	0.77%	0.93%
KEDNY Gas	\$68,073,824	\$16,040,713	\$84,114,537	\$51,159,061	\$76,738,592	2.66%	3.29%
NFG Gas	\$18,685,886	\$2,488,982	\$21,174,868	\$14,809,103	\$22,213,654	2.52%	2.86%

³⁴ Estimates based on utility 2024-2025 EAP budgets. Assumes 100% Enhanced EAP enrollment and minimum discounts.

Appendix E

Appendix E

MONTHLY COLLECTIONS REPORT

Utility:

RESIDENTIAL SERVICE

MONTH
OF: _____

		TOTALS	
ITEM DESCRIPTION			
		Customer	Dollars
1	Arrears Greater Than Sixty Days		
2	Final Termination Notices This Month		
3a.	Unresolved Arrears (FTN Expired)		
3b.	Accounts Eligible For Field Action		
4a.	Terminations For Non-Payment - All		
4b.	Terminations For Non-Pmt - Heat Related		
4c.	Terminations For Non-Pmt - Service Limiter		
4d.	Term. Other Than Non-Pmt. or Cust. Request		
5	Reconnections for Non-Pmt.		
5a.	Reconnects Due To HEAP or DSS		
5b.	Reconnects Due To Deferred Payment Agrmt.		
6a.	Active DPA's At The Beginning Of This Month		
6b.	Deferred Payment Agreements Made		
6c.	Deferred Payment Agreements Reinstated		
6d.	Deferred Payment Agreements Defaulted		
6e.	Deferred Payment Agreements Satisfied		
6f.	Active DPA's At The End Of This Month		
6g.	Percent Of DPA's In Arrears > 60 Days		
7a.	Uncollectibles This Month		
7b.	Percent Of UCB's with Less Than 1 Year Service		

7c.	Resid. UCB Accounts with One or More DPA	
8	Residential Sales	
9a.	Residential Bankruptcies	
9b.	Percent Of Bankruptcies Compared To All UCB's	
10a	Final Bills Issued This Month (Res & NonRes)	
10b	Final Bills With Arrears This Month	
10c	Final Bills With One or More DPA (last 12 months)	
11	Deposits Received This Month	