Seattle City Light

DEPARTMENT POLICY & PROCEDURE

UTILITY DISCOUNT PROGRAM		
DPP NUMBER	DPP 500 P III-428	
EFFECTIVE DATE	May 31, 2017	**SUPERSEDES** n/a "New"
APPROVED BY		Larry Weis, General Manager and CEO

1.0 Purpose

1.1 To establish the qualifications, application process, documentation requirements, determination criteria, and eligibility for Seattle City Light's Utility Discount Program (UDP) which provides reduced electric rates to eligible low-income customers as established by Seattle Municipal Code 21.49.040.

2.0 Organization Affected

2.1 The Customer Care Division implements the Utility Discount Program on behalf of Seattle City Light.

3.0 References

3.1 City of Seattle Ordinance 125171, Electric Rates and Provisions – Seattle City Light, or as the same may be amended or superseded.

3.2 Seattle Municipal Code, 21.49.040 - Residential Rate Assistance

4.0 Policy

4.1 An applicant is eligible for UDP if the applicant is an adult household member (18 years or over), is the primary City Light electric service account holder and receives Supplemental Security Income (SSI) pursuant to title 42 United States Code (USC) sections 1381 through 1383 OR the combined income of all adult household members does not exceed 70 percent of the Washington State median income for the number of individuals in the household.

5.0 Procedure

5.1 UDP Application. Customers may apply for UDP to Seattle City Light or the Seattle Human Services Department in person, over the telephone, via the UDP website or by email. Customers applying for UDP over the telephone will be assisted in completing an application and receive detailed information regarding the required proof of eligibility.

5.1.1 Standard Application. An applicant must identify all household members and provide verification of identity and income for all adult household members.

5.1.2 Streamlined Application. An applicant who is certified for Supplemental Nutrition Assistance Program (SNAP) or Washington State Basic Food Assistance program must identify all household members and provide verification of identity of all adult household members and SNAP client ID # or Social Security numbers. No further income verification is required.

5.1.3 Auto-enrollment. A tenant of specified low-income-housing provider partners within Seattle utilities' retail service areas, including Seattle Housing Authority, Washington State Housing Finance Commission supported housing and King County Housing Authority, are enrolled automatically in UDP based on an eligibility determination made by the housing provider, unless the tenant opts out of the UDP. The housing provider transmits a list of qualified tenants to the UDP. Customers are notified of their enrollment via mail, and, in compliance with the City's Privacy Program are given the opportunity to opt out of UDP if they believe they are not qualified for the program, or choose not to participate.

The UDP auto-enrollment program participant lists are updated annually. An unenrolled tenant of a specified low-income-housing provider partner may choose to apply to participate individually using the Standard, Streamlined, or Express Application methods rather than wait for the annual auto-enrollment update.

5.1.4 Express Rate Application (ERA). Participating non-profit housing providers may assist tenants by identifying all household members and verifying the identity and incomes of all adult household members.

5.1.5 Voucher Program. Utility customers who are residents of property under a written lease that do not have individual City Light utility accounts or have third-party billing utility accounts may be able to receive utility credits. The property owner must agree to participate in the UDP and enter into an agreement to do so. The tenant must identify all household members and provide verification of the identity and incomes of all adult household members.

5.2 Application Processing. A UDP applicant is required to provide all necessary documentation in compliance with program intake procedures and eligibility guidelines. Regardless of the date the applicant places on the application, the date the UDP receives the completed application determines when benefits begin if the customer is certified as eligible. An application is considered complete only when all required documentation has been received by the UDP.

5.2.1 An applicant may be requested to clarify questions that arise during application processing by telephone, email, fax, U.S. mail, and/or in-person interviews.

5.2.2 When the UDP receives an incomplete application, UDP will contact the applicant within 3 business days to request the missing information. If the applicant is nonresponsive, UDP may contact the applicant again. If the applicant does not respond within 90 days from the date of the initial application, the application will be determined "non-responsive" and closed. If the applicant responds and takes action but does not complete the application within 90 days from the date of the initial application, UDP may require applicant to submit updated income verification information before final approval. If the applicant does not complete the application within 120 days from the date of the initial application, the application will be determined "incomplete" and closed.

5.2.3 Once an application is complete, the UDP endeavors to complete the eligibility determination within 21 business days. Once an applicant is determined eligible, the customer will be enrolled in the UDP and receive utility discounts effective the date UDP received the completed application. UDP will notify applicants of the determination.

5.3 Recertification. Customers are required to submit recertification documentation at specified intervals to ensure continued eligibility for the UDP, including identifying current household members and verifying the identities and incomes of adult household members.

5.3.1 Recertification Periods. The standard certification period is 2 years. For Senior-only (65+) households, the certification period is 3 years. For auto-enroll households, the certification period is 5 years. Auto-enroll lists are updated annually between UDP and the housing providers.

5.3.2 Recertification Processing. UDP will notify the customer at least 45 days prior to the recertification date of the need to submit a recertification application and the required documentation. If there is no response by the recertification date, UDP eligibility will be terminated and the customer removed from the program the day after the recertification date. If the customer responds on or prior to the recertification date, but the recertification application is incomplete, the UDP will contact the customer within 3 business days to request the missing information. If the recertification application is not complete, UDP eligibility will be terminated and the customer will be removed from the program 20 days after the recertification date.

5.4 Random Re-verification Audits. The UDP may request a customer to provide verification of the identities and incomes of adult household members at any time during a certification period through a random re-verification audit, which may be done as part of program management to ensure that benefits are available to qualified households only. If a customer does not complete the re-verification audit in a timely manner and in accordance with the re-verification procedures customer participation will be terminated.

5.5 Household Determinations. UDP applicants must identify all members of the household and provide documentation for the identity of each adult (18 years or older) living in the household. Minors (children under age 18) must be listed on the UDP application, but identification documents are not required. Households consisting of seniors only (age 65+) are considered senior households. Households with any other combination of minor(s) and adult household member(s), including seniors, shall be considered regular households.

5.5.1 Acceptable Identification Documentation. Adults must provide copies of government-issued personal identification, which may include the following:

- State driver license
- State identification card
- Passport
- U.S. military card
- Native American tribal document
- Permanent resident card
- Matrícula Consular (Government of Mexico ID with photo)
- School identification card
- Other documentation acceptable to the UDP

5.5.2 Ineligible Households. The following are not eligible for the UDP

5.5.2.1 Mixed-Load Accounts. Mixed loads, such as mother-in-law apartments and duplexes, with a single electric meter are not eligible for rate assistance unless all units apply as one household.

5.5.2.2 Business operated out of the home. Applicants who are self-employed and operate a business out of their home where the percentage of business use of the home is 51 percent or more, as listed on the IRS Form 8829, are not eligible for the UDP. Examples include in-home beauty salons, daycares, and mechanic shops.

5.6 Household Income Determination. UDP applicants must provide documentation of the income, and any allowable exemptions or deductions, for all adult household members in the one calendar month period preceding the date of the completed application. (Example, date of initial application July 15, applicant must provide income verification for month of June.) A 12-calendar month period may be used instead to account for work that is seasonal in nature. One-time lump sum payments, such as monetary gifts, inheritance, or insurance settlements will be averaged over 12 months. Applicants must submit documentation for income received from all sources.

5.6.1 Types of Income Included. Income is taken at gross value unless there is a specific allowable exemption or deduction. Income includes, but is not limited to:

- Temporary Aid to Needy Families (TANF) payments
- Casual labor: (payments for odd jobs and other casual labor)
- Child support: (payments made to the custodial individual)
- COPES/ Medicaid Personal Care: (care provider income is included when the care provider lives with the applicant)
- Equity income (income from the sale of securities and bonds including re-invested income)
- Estate trust and dividend distribution payments
- Foster care and adoption support payments
- Aged, Blind or Disabled Cash Assistance Program Payments
- Monetary gifts
- Industrial insurance payments and settlements
- Interest income from interest-bearing deposit accounts
- Pensions and retirement payments or distributions
- Private disability payments, including ongoing long-term benefits
- Property sales income (any gains from the sale of house, car, etc.)
- Refugee support payments by public or private agencies
- Rental income from non-owner-occupied rental properties
- Salary and wages, including overtime
- Sales commission payments
- Scholarships and educational stipends or grants
- Self-employment income
- Social Security Income
- Social Security Disability Insurance (SSDI) and Supplemental Security Insurance (SSI) income
- Spousal maintenance or alimony

- Survivor or beneficiary benefits or payments
- Third-party payments for shelter costs (e.g., rent or mortgage) made on behalf of household
- Tip income
- Unemployment compensation
- Work/study payments

5.6.2 Allowable Exemptions from income

- Food assistance (direct or third-party payments for food)
- Loans to household: (loan proceeds if a written payback schedule is provided)
- Protective payee income (income received by an adult household member acting as representative payee on behalf of an individual living outside the household, e.g. SSI)
- Minor income (any income received by household members under age 18)
- Rental Income (if a household includes an adult roommate that pays rent to another adult in the household, the rental income will be exempted from the household income to avoid double counting of income).

5.6.3 Allowable Deductions from income

- Business expenses (business expenses such as advertising, business travel expenses, business insurance, legal and professional fees, office and other supplies, postage, rent, utilities and telephone for business property use only if business use of home is less than 51 percent of use can be deducted from self-employment income).
- Education expenses (expenses for tuition, books and fees can be deducted from scholarship, educational stipends, grant or work/study income).
- Medicare premium expenses (the current standard Medicare part B premium amount may be deducted from Social Security, SSDI and SSI income. See Medicare.gov for current premium amount.

5.6.4 Acceptable Income Documentation

- Agency payments (award letters, check stubs, and other documentation from the authorizing agency, such as TANF, GAU, or GAX)
- Rental income (cancelled checks, bank statements, receipts)
- Child support (court orders or state agency documents reflecting support payment information)
- Earned income (wage stubs, year-to-date statement of earnings or employer statement reflecting gross weekly or monthly pay covering the income determination period, and/or a self-request for records form from the Employment Security Department [ESD])
- Financial aid (agency or educational institution award letter)
- Loans (Self-Declaration of Income form or written documentation from lender)
- Outside assistance (Self-Declaration of Income form indicating dates and amounts received signed by parties receiving support)
- Self-employment earnings
    - Casual labor (earnings documented using a Self-Declaration of Income form)
    - Professional services (earnings documented using a Self-Employment Profit Statement form)

    - Allowable business deductions (most recent tax return with all forms and schedules, including Schedule C and Form 8829)
- Unemployment compensation (copy of claim history reflecting weekly benefits and/or an ESD self-request for records form
- Work/study (payroll check stubs or statement of gross earnings)
- Lump Sum payments (award letters, distribution statements, check stub, or Self-Declaration of Income form)
- No income: households with adults that are without income must submit a Declaration of No Income Statement, or an explanation of how housing costs, food, utilities and other essential needs are met when income is at or below the cost of housing. UDP will also get an On-line Claim History printout from the ESD . High school students older than 18 or individuals who do not have a social security number need to complete only a Declaration of No Income Statement.

5.7 Eligibility Issues

5.7.1 Reverification audits. Up to ten percent of UDP enrolled households will be randomly selected to participate in a reverification audit. This audit requires customers to provide up to date income and household information to assure enrolled households continue to meet program eligibility requirements. Additionally, customers are expected to notify the UDP of changes in their income or housing situation.

5.7.2 Transfer Status. Customers who are moving residences within City Light boundaries, who are the primary City Light account holders on both the old and new accounts, and who are not in the process of program recertification, may transfer their UDP eligibility for the discounted rate to their new residence. Customers need to notify City Light or the UDP directly of the move and if their household composition changes so that they may be re-screened for eligibility. Auto-enrollment customers moving from one qualified housing unit to another will be able to transfer UDP status when they move. Auto-enrollment customers that move to a non-auto-enrolled qualified unit must apply using one of the other application processes.

5.7.3 Terminations/Removal from UDP. Customers may be removed from the UDP for a variety of reasons, including moving out of the service area or moving into a housing situation where they are not listed as the primary utility account(s) holder. Customers may also be terminated because they did not respond to recertification notices, did not complete the recertification process, did not respond to reverification audit notices, did not complete the reverification audit process, or because their household and/or income situation has changed. Customers may also be removed from UDP upon the customer's request.

5.7.4 Billing Adjustments. If it is discovered that a customer household has knowingly given false, misleading, or incomplete information, the customers' participation in the UDP will be terminated. The City of Seattle may adjust the customers' utility bills to reflect the full cost of utility service to recover the costs from periods the customer was not eligible for the discounted rates.

5.8 MISCELLANEOUS. UDP may implement pilot programs from time to time to evaluate new eligibility guidelines such as application methods or documentation requirements. A pilot

program may vary from the requirements of this Rule, but will be consistent with SMC 21.76 and the term of the pilot program and the alternative guidelines or requirements for applicants will be documented in writing.

6.0 Appendix:

Distribution: Posted online @ http://sclweb.light.ci.seattle.wa.us/dpp/

REVISION HISTORY:

DATE	CHANGES MADE	REVISED BY
4/7/17	New DPP to establish the qualifications, application process, documentation requirements, determination criteria and eligibility for Seattle City Light's Utility Discount Program.	Author: Kelly Enright, Jim Baggs Coordinator: Kim Kinney

INTERNAL APPROVAL:

Divisions:	
Customer Service, Communications and Regulatory Affairs	☒
Customer Care Division	☒