

**MARYLAND PUBLIC
SERVICE COMMISSION**

ELECTRIC UNIVERSAL SERVICE PROGRAM

2022 ANNUAL REPORT

Pursuant to
§ 7-512.1(c) of the Public Utilities Article
Annotated Code of Maryland

Prepared for the Maryland General Assembly

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ELECTRIC UNIVERSAL SERVICE PROGRAM 2022 ANNUAL REPORT

I. OVERVIEW

The Electric Universal Service Program (“EUSP”), enacted in the Electric Customer Choice Act of 1999 (“the Act”), was designed by the Maryland General Assembly to assist low-income electric customers to retire utility bill arrearages, to make current bill payments, and to access home weatherization following the restructuring of Maryland’s electric companies and electricity supply market. The Act, codified as Public Utilities Article, *Annotated Code of Maryland*, § 7-512.1 (“PUA § 7-512.1” or “EUSP Legislation”), required the Maryland Public Service Commission (“Commission”) to establish the program, make it available to low-income electric customers statewide, and provide oversight to the Office of Home Energy Programs (“OHEP”), within the Department of Human Services, Family Investment Administration (“DHS”), which is responsible for administering the EUSP.

II. LEGISLATIVE REQUIREMENTS

Under the Act, the Commission is required to oversee the EUSP as it is administered by DHS, through OHEP. PUA § 7-512.1(c)(1) requires the Commission to report annually to the General Assembly regarding the following:¹

- (i) A recommendation on the total amount of funds for the program for the following fiscal year, subject to the amounts that are to be collected under PUA § 7-512.1(e) and based on:
 1. the level of participation in and the amounts expended on bill assistance and arrearage retirement during the preceding fiscal year;
 2. how bill assistance and arrearage retirement payments were calculated during the preceding fiscal year;
 3. the projected needs for the bill assistance and the arrearage retirement components for the next fiscal year; and
 4. the amount of any bill assistance or arrearage retirement surplus carried over in the electric universal service program fund under PUA § 7-512.1(f)(6)(i).
- (ii) For bill assistance, the total amount of need, as determined by the Commission, for electric customers with annual incomes at or below 175% of the federal poverty level and the basis for this determination;

¹ Numbering is as it appears in the PUA.

(iii) The amount of funds needed, as determined by the Commission, to retire arrearages for electric customers who have not received assistance in retiring arrearages under the electric universal service program within the preceding seven fiscal years, and the basis for this determination;

(iv) The amount of funds needed, as determined by the Commission, for bill assistance and arrearage retirement, respectively, for customers for whom income limitations may be waived under § 7-512.1(a)(7) of the PUA, and the basis for each determination;

(v) The impact on customers' rates, including the allocation among customer classes, from collecting the total amount recommended by the Commission under item (i) above; and

(vi) The impact of using other federal poverty level benchmarks on costs and the effectiveness of the electric universal service program.

To assist the Commission in preparing its recommendations, OHEP is required under PUA § 7-512.1(c)(2) to report the following information to the Commission each year:

1. the number of customers and the amount of distributions made to fuel customers under the Maryland Energy Assistance Program ("MEAP") identified by funding source and fuel source;
2. the cost of outreach and educational materials provided by OHEP for the EUSP; and
3. the amount of money that DHS receives, and is expected to receive for low income energy assistance from the Maryland Strategic Energy Investment Fund/Regional Greenhouse Gas Initiative ("SEIF/RGGI"), the MEAP (for electric customers only), and any other federal, State, local, or private source.

III. BASIS FOR FINDINGS AND RECOMMENDATIONS

The Commission's consideration and review of EUSP operational plans and proposals, workgroup reports, program reports, and filings is docketed in Case No. 8903, *In the Matter of the Electric Universal Service Program*. On July 29, 2022, OHEP filed its EUSP Proposed Operations Plan for Fiscal Year ("FY") 2023. Following receipt of comments from interested parties, the Commission held a hearing to consider the Proposed Operations Plan. On September 13, 2022, the Commission approved OHEP's Operations Plan for FY 2023 and authorized the allocations for FY 2023 proposed by OHEP from ratepayer funding, as provided under PUA § 7-512.1(e).²

² See Order No. 90387, issued October 12, 2022.

In Order No. 90387, the Commission noted that OHEP anticipates total funding for the EUSP in FY 2023 to be \$118,862,000 after an addition of \$82,817,693 from the SEIF/RGGI.³ OHEP also administers federal funding from the Low Income Home Energy Assistance Program (“LIHEAP”); however, this funding is outside the EUSP.

By Order No. 90387, the Commission also directed OHEP to continue to provide the Commission semiannual updates on its integration into MD THINK and its transition to categorical eligibility and directed Staff to continue to participate in the Limited-Income Mechanisms and Assistance Work Group and provide periodic reports to the Commission. Finally, the Commission directed OHEP to include in its Proposed Operations Plan for FY 2024 its plan to reduce future administrative costs to a more sustainable level.

On December 15, 2022, OHEP filed its *FY 2022 Electric Universal Service Program Annual Report* (“Annual Report”) in compliance with PUA § 7-512.1(c)(2).

a. OHEP FY 2022 ANNUAL REPORT

In its Annual Report, OHEP provided highlights pertaining to the operation of the EUSP for the July 1, 2021–June 30, 2022 program year. Table 1 shows the total households served, the total benefits expended, and the average benefit awarded per household for both bill assistance and arrearage retirement.⁴ OHEP’s Annual Report indicates that 4.7 percent fewer households received bill assistance in FY 2022 compared to FY 2021. However, 17 percent more households received arrearage retirement assistance during FY 2022 in comparison with FY 2021.⁵

Table 1 Comparison of EUSP Data for FY 2021 and 2022⁶

	Households Served	Total Benefit Expense	Average Grant
Bill Assistance			
FY 2021	83,702	\$41,800,000	\$504
FY 2022	79,951	\$60,800,000	\$763
Difference	-4.7%	45.5%	51.4%
Arrearage Retirement			
FY 2021	17,774	\$18,600,000	\$1,047
FY 2022	20,792	\$20,700,000	\$997
Difference	17.0%	11.3%	-4.8%
EUSP Total			
FY 2021	83,702	\$60,400,000	\$722
FY 2022	79,951	\$81,500,000	\$1,019

³ FY 23 exhibited a large increase in total EUSP funding due to the increase in RGGI/SEIF funding for FY 2023.

⁴ *FY 2022 Electric Universal Service Program Annual Report to the Maryland Public Service Commission* (“Annual Report”) at p. 5.

⁵ *Id.*

⁶ *Id.*

OHEP did project that \$70 million for bill assistance and arrearage benefit assistance would be adequate to meet the demand for assistance in FY 2023. However, OHEP noted that it expects to maintain the current service level to serve all households at the previous year's benefit levels.⁷ In FY 2022, \$27.5 million in ratepayer funds went to fund bill payment assistance.⁸ MEAP and SEIF/RGGI also provided assistance for the EUSP's bill payment assistance component of approximately \$35.4 million.⁹ In recent years, arrearage retirement has been fully funded by SEIF/RGGI monies;¹⁰ and this year all electric arrearage requests were satisfied with SEIF funding. OHEP notes that during fiscal year 2022 the collection of ratepayer funds was \$32,060,743.¹¹ The remaining \$4.56 million in ratepayer funds that are not used for EUSP bill payment assistance are applied to OHEP's administrative expenses.¹²

OHEP also administers MEAP, which is federally funded through the Low Income Home Energy Assistance Program ("LIHEAP"). Because MEAP pays for heating assistance, its grants are not limited to public service companies providing electricity and gas heating service,¹³ but also go to vendors of non-regulated fuels such as oil and propane. For customers who heat with electricity, EUSP and MEAP work in tandem, resulting in increased EUSP benefits for electric heating customers because MEAP funds are used to cover heating costs. Benefit expenditures for MEAP in FY 2022 totaled \$63,800,000, of which approximately 47.9 percent went to electricity.¹⁴

OHEP states that its outreach activities continued to be conducted by its local administering agencies in FY 2022.¹⁵ OHEP's outreach is often done in partnership with utilities and organizations performing low-income energy-related work, including those which focus on children, the elderly, and the ill and disabled.¹⁶ OHEP's Annual Report is attached to this Report as an Appendix.

b. How Benefits Were Calculated for FY 2022 and Will Be Calculated for FY 2023

For bill assistance under the EUSP, OHEP uses a formula to customize the benefit amount to be paid to each participant. The following factors contribute to the size of a participant's EUSP benefit: (1) gross household income, (2) household size, (3) electricity usage, and (4) price of electricity for a given customer. In administering the EUSP, OHEP divides

⁷ Annual Report at 18.

⁸ *Id.* at 5.

⁹ *Id.*

¹⁰ *Id.* at 13.

¹¹ *Id.* at 18.

¹² *Id.* at 10.

¹³ OHEP discusses a gas arrearage program in its Annual Report; this program is funded by MEAP using LIHEAP funding.

¹⁴ *Id.* at 21.

¹⁵ *Id.* at 22.

¹⁶ OHEP's outreach activities and customer services are described on pages 15-16 of its Annual Report.

participants into groups based on gross household income using the federal poverty levels (“FPL”), as suggested at PUA § 7-512.1(a)(1). The EUSP groups are as follows: (1) Poverty Level 1 (0 to 75 percent FPL), (2) Poverty Level 2 (76 percent to 110 percent FPL), (3) Poverty Level 3 (111 percent to 150 percent FPL), (4) Poverty Level 4 (151 percent to 175 percent FPL) including households with one or more members over the age of 67 with household income between 175 percent and 200 percent FPL,¹⁷ and (5) Poverty Level 5, which is composed of subsidized housing occupants, whose incomes vary and who receive rental subsidies including varying utility service subsidies. The lower an EUSP participant’s poverty level, the higher the benefit they receive. The FPL income limit varies with household size. OHEP awards participants in Poverty Level 5 a relatively small benefit in recognition of the fact that these participants already receive some energy assistance through a housing subsidy.

The electricity usage of each EUSP participant as certified by the participant’s electric company is taken into account up to a set limit, with additional bill assistance provided from MEAP to participants who heat with electricity. A final adjustment is made for the relative cost of electricity for each EUSP participant such that EUSP participants served by an electric company with rates either higher or lower than the average receive a slightly higher or lower benefit. OHEP’s formula results in an equitable distribution of benefit grants to EUSP participants with the most pressing needs, based on income and usage.

Table 2 Distribution of Bill Assistance by Poverty Level for FY 2022¹⁸

Poverty Level	Income Level	Participants	% of Distribution
1	0-75%	29,936	37.4%
2	76% - 110%	21,773	27.2%
3	111% - 150%	19,358	24.2%
4	151% - 175%	8,022	10.0%

OHEP uses the FPL poverty levels described above to assess a household’s eligibility for arrearage assistance as well as bill payment assistance. For FY 2022, OHEP set a minimum arrearage amount of \$300 for a household to qualify for arrearage assistance from the EUSP; the maximum arrearage benefit allocated from the EUSP for one household was \$2,000.¹⁹ Applicants requiring arrearage assistance beyond the OHEP maximum of \$2,000 or below the \$300 minimum are referred to community-based programs.

In FY 2014, OHEP instituted a new arrearage waiver policy allowing households having a member over the age of 65 or under the age of 2, or a household member who is considered to be disabled, including but not limited to medically fragile persons, to apply for additional funds not to exceed the \$2,000 cap, if these households had received \$800 or less in arrearage

¹⁷ PUA 7-512.1(a)(2).

¹⁸ *Id.*, Table 5 at 12.

¹⁹ Annual Report at 13.

retirement assistance during the past seven years. In FY 2022, 132 households considered vulnerable, based on the previously stated criteria, received benefits totaling \$109,149.²⁰

OHEP recommends continuing the use of its current methodology for calculating benefits because it customizes the benefit to the needs of the individual recipient, allows for the equitable distribution of funds, and allows for the integration of a MEAP benefit without duplication.²¹

c. OHEP Projections for Funds to Be Expended in FY 2023

OHEP anticipates that \$70 million for bill assistance and arrearage benefit assistance is adequate to meet demand for assistance in FY 2023. OHEP also acknowledges that, based on current projections, it will be able to maintain the current service level needed to serve all households at the previous year's benefits level. This is discussed in more detail below.

IV. FINDINGS AND RECOMMENDATIONS

a. Total Amount of Funding Recommended for FY 2023

Under the current funding structures and eligibility criteria, the Commission recommends the FY 2023 EUSP funding levels outlined in Table 3 below. This recommendation is based on current participation levels as detailed in Table 1 and the collection of funds at the statutory level. Methods for calculating bill payment assistance and awarding arrearage retirement assistance are discussed in Section III B above and will remain unchanged.

Table 3 Projected Funds Available for FY 2023 from All Sources

Funding Source	Amount
Ratepayer Statutory Collection	\$37,000,000
Allocation from RGGI Auctions	\$22,400,000
MEAP Funding for EUSP Participants	\$39,000,000 ²²
Dominion Cove Point Settlement	\$400,000
Total	\$98,800,000

The Commission supports OHEP's practice of using SEIF/RGGI funds for arrearage retirement because this allocation allows more ratepayer funding to be used for bill assistance while simultaneously covering more EUSP participants in need of arrearage retirement assistance. OHEP projects that \$70 million is needed for both bill assistance and arrearage

²⁰ *Id.*

²¹ Annual Report at 18.

²² This is an estimate. OHEP states that it has been allocated approximately \$78M, of which approximately 50 percent is usually allocated to low-income winter heating needs.

benefit assistance in FY 2023.²³ The Commission supports the continuation of an average OHEP bill assistance grant of at least \$500. The Commission recommends that 12 percent of ratepayer money be set aside for administration and supports the continuation of outreach at the proposed level of \$200,000. To further support the success of the EUSP, the Commission recommends that OHEP use the portion of SEIF/RGGI funds for bill assistance that OHEP does not allocate to arrearage assistance or EUSP direct program costs.

The Commission recognizes that OHEP may face as yet unknown challenges and agrees that close monitoring of these and other circumstances through the OHEP Advisory Group and direct communication with the Commission and its Staff is necessary to respond to any unexpected needs.²⁴

b. Total Amount of Need for Bill Assistance (Electric Customers with Annual Incomes at or below authorized Federal Poverty Levels and the Basis for this Determination)

Under PUA § 7-512.1(a)(1), EUSP eligibility extends to 175 percent of the federal poverty level as a general matter²⁵ with exceptions for those within subsidized housing and households with one or more occupants over 67. OHEP’s Report shows that applications for EUSP Bill Payment Assistance have decreased 20 percent since FY 2021, and bill assistance benefit expenditures totaled \$44 million.²⁶ OHEP makes no specific projections regarding the number of applications for 2023. However, OHEP states that current funding levels are adequate to meet the need for bill assistance and arrearage assistance needs. In addition, OHEP will continue to work with its Advisory Board, on which Commission Staff is a participant, to monitor funding availability.

The Commission notes that the number of actual participants in EUSP has decreased in recent years. In addition, the manner in which participants are enrolled is expected to be tied to eligibility in other low income programs, known as categorical eligibility, which should, over time, help provide benefits to more eligible Maryland households.

The EUSP statutory mandate is to assist qualifying electric customers through bill assistance, arrearage retirement, and weatherization. OHEP’s Annual Report projects that \$70 million for bill assistance and arrearage benefit assistance will be adequate to meet the EUSP needs for FY 2023.²⁷ OHEP’s Annual Report indicates, as reflected in Table 3 above, the approximate funds that will be available in FY 2023 from the ratepayers’ statutory collection, SEIF/RGGI and MEAP.

²³ See Annual Report at 18.

²⁴ *Id.*

²⁵ Exceptions are made for those within subsidized housing where there is no specific income requirement after a family is assigned to such housing and households with one or more occupants over 67. The income limit for these older individuals is 200% FPL; however, the household is treated as if it were FPL 1, 2, or 3, as applicable.

²⁶ Annual Report at 17.

²⁷ *Id.* at 18.

In light of the EUSP's statutory mandate and OHEP's current participation levels, the Commission recommends the EUSP budget and funding levels discussed broadly in OHEP's Annual Report inclusive of SEIF/RGGI and LIHEAP funds. Specifically, the Commission agrees with OHEP that the EUSP will require \$70 million of funding in FY 2023. The Commission notes that the average benefit should continue to be weighted to FPL 1 and FPL 2, where the need is greatest.

c. Arrearage Retirement Assistance Funding

The Electric Customer Choice Act limits arrearage retirement assistance for EUSP participants to once every seven years. The total amount of ratepayer funds that may be spent on arrearage assistance is limited by statute to \$1.5 million. In FY 2022, OHEP awarded \$20.7 million of non-ratepayer funds for EUSP arrearage retirement.²⁸ It is the Commission's long-standing position that the EUSP should fund current bills over past arrearages. Due to funding provided by SEIF/RGGI, OHEP generally expends non-ratepayer funds for this purpose, and the Commission supports this expenditure.

d. Income Limitation Waivers

Under PUA §7-512.1(a)(7), OHEP may waive the income limitations for customers who could qualify for a similar waiver under MEAP. In light of the funding available to OHEP and the use of consistent income limitation structures for both the EUSP and the MEAP, the Commission has supported OHEP's ongoing practice of offering no waivers to households above the EUSP statutory limit. OHEP recommends retaining this policy and requests no funding for this purpose. The Commission does not oppose OHEP's continuation of this policy.

e. Impact on Customers' Rates Including the Allocation among Customer Classes

By Order No. 89105, issued April 24, 2019, the Commission lowered the residential rate for EUSP from \$0.36 to \$0.32 and also reduced rates for nonresidential customers by 30.64 percent for each of the 24 tariff tiers.²⁹ All Maryland electric utilities were directed to file revised tariffs. The tariffs were filed and approved by the Commission with effective dates of May 2019 and June 2019. Staff was directed to conduct an annual review in April of each year, and, should an over-collection exist for the previous fiscal year, file a recommendation with the Commission on how to change the rates to refund the over-collection to customers. The first review was scheduled to take place in April 2020. In its 2019 Annual Report, OHEP noted that

²⁸ *Id.* at 3.

²⁹ Non-residential customers, from C&I classes, are allocated charges based on annual utility billings according to a 24-tier matrix. During the first quarter of each year, the electric companies are required to review the revenue received during the previous year and to reallocate EUSP charges to non-residential customers as necessary. Growth in the number of residential customers and changes in the amount of revenues from non-residential customers cause fluctuation in the amounts collected.

approximately \$6.8 million in funds in excess of the statutory limit had been collected during FY 2019.³⁰ Staff originally anticipated that the overcollection would return to \$0 by July 2020 due to the revised tariffs. OHEP reports that it has under-collected in the most recent fiscal year. Commission Staff is in the process of reviewing the status of the statutory collections. OHEP recommends that the rate of collection be examined to ensure adequate funding in the future. The Commission agrees with OHEP's recommendation.

f. The Impact of Using Other Federal Poverty Program Benchmarks

OHEP uses the federal poverty level to determine eligibility for EUSP assistance. Under the EUSP legislation, eligibility is capped at 175 percent FPL. The FPLs are based on gross household income and family size and are updated periodically based on various cost of living indices. The FPLs are publicly available and widely used. OHEP uses a consistent eligibility system for the EUSP and the federally-funded MEAP. This similarity facilitates administration of the two programs and, by creating certain synergies, enables OHEP to make more efficient use of its combined federal, State, and ratepayer funding.

OHEP stated that it is focused on streamlining the process for people that choose to apply for energy assistance, and have implemented numerous new initiatives to improve access to energy assistance. The Low Income Utility Workgroup, in which OHEP is a participant, has also explored possible ways in which EUSP program eligibility criteria could become more aligned with eligibility criteria of other programs such as: SNAP (Supplemental Nutrition Assistance Program), Medical Assistance, Supplemental Security Income, and TANF (Temporary Assistance to Needy Families). OHEP states that it will support any legislative action to enable this programmatic alignment. The Commission will continue to monitor potential updates to the program.

The benchmark for determining eligibility for participation in the EUSP is crucial to determining the aggregate funding needed by the EUSP. To the extent that aggregate funding interacts with benefit size, these benchmarks and the manner in which they are applied greatly impact the success and effectiveness of the EUSP. The Commission does not recommend changing the existing OHEP benchmarks.

V. CONCLUSION

Based on the OHEP FY 2022 Annual Report, the Commission recommends that the total amount of funds for the EUSP for FY 2023 be at least \$98.8 million as discussed above.³¹ The Commission approved the ratepayer funding requested by OHEP in September 2022 and supports OHEP's plans for the remaining funds. For the reasons stated herein, the Commission finds that this amount of funding is necessary to protect low-income electric customers in Maryland.

³⁰ Annual Report at 18.

³¹ This recommendation is inclusive of MEAP funds.

APPENDIX



**FISCAL YEAR 2022
ELECTRIC UNIVERSAL SERVICE PROGRAM
ANNUAL REPORT
TO THE
MARYLAND PUBLIC SERVICE COMMISSION**

MARYLAND DEPARTMENT OF HUMAN SERVICES
FAMILY INVESTMENT ADMINISTRATION
OFFICE OF HOME ENERGY PROGRAMS

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Introduction

The Deregulation Act of 1999, codified in Md. Code Ann., Public Utilities §7-512.1 established the Electric Universal Service Program (EUSP) for the purpose of assisting electric customers with annual incomes at or below 175% of the federal poverty level. In 2021 the Maryland General Assembly passed MD Code, Public Utilities, § 7-512.1 which expanded eligibility for the Electric Universal Service Program to households containing at least one member who is 67 years or older to 200% of the federal poverty level. The Department of Human Services (DHS) Family Investment Administration (FIA) Office of Home Energy Programs (OHEP) administers EUSP and oversees the 20 local administering agencies (LAAs) located throughout Maryland, where applications for assistance are accepted and processed.

EUSP also features Arrearage Retirement Assistance funded through the Maryland Strategic Energy Investment Fund/Regional Greenhouse Gas Initiative (SEIF/RGGI). EUSP, along with the Federal Low Income Home Energy Assistance Program (LIHEAP) operated as the Maryland Energy Assistance Program (MEAP), provide benefits to low-income Marylanders that make electricity and heating for their homes more affordable. The programs administered by OHEP are integrated and share a common application to streamline the energy assistance application process for Maryland families.

Md. Code Ann., Public Utilities § 7-512.1(c) requires that OHEP file an Annual Report with the Public Service Commission. This report provides a summary of the 2022 program year and responds to legislatively mandated questions outlined in the statute. This report also contains estimates of future trends and planning recommendations for the next program year.

Program Highlights

- In FY 2022 OHEP received a total of 120,157 applications from customers seeking heating and electric assistance from OHEP administered programs.
- In FY 2022 \$60.9 million in EUSP Bill Payment Assistance benefits was issued to 79,951 households.
 - In FY 2022 the average Bill Payment Assistance benefit was \$763.
- In FY 2022 \$20.7 million in Electric Arrearage Retirement Assistance benefits was issued to 20,792 households.
 - The average Arrearage Retirement Assistance benefit was \$997.

Program Data

- Table 1 provides information on the number of households receiving EUSP Bill Payment Assistance and Arrearage Retirement Assistance benefits. It includes data since FY 2007, showing trends over time in the number of households served and expenditures.
- Table 2 displays summary data on the MEAP program, which is federally funded by LIHEAP funds.
- Table 3 provides information regarding the FY 2022 EUSP supplemental benefit.
- Table 4 provides information for EUSP administrative expenditures.
- Table 5 provides distribution of EUSP recipients by poverty level.

Table 1. EUSP Summary Data FY 2007-2022

Program and Year	Applicants Served	Average Grant	Ratepayer Funds (millions)	Other Funds (millions)	Total Benefit Expenditures (millions)
<i>Bill Assistance</i>					
2022	79,951	\$763	\$27.5	\$35.4	\$60.8
2021	83,702	\$504	\$30.9	\$10.9	\$41.8
2020	84,079	\$492	\$30.9	\$10.4	\$41.3
2019	93,523	\$506	\$32.4	\$14.9	\$47.3
2018	94,655	\$498	\$32.2	\$14.9	\$47.1
2017	96,434	\$506	\$30.9	\$17.8	\$48.7
2016	102,947	\$394	\$30.7	\$9.8	\$40.5
2015	109,095	\$351	\$33.9	\$4.4	\$38.3
2014	115,664	\$357	\$35.4	\$5.8	\$41.2
2013	111,288	\$325	\$34.5	\$1.6	\$36.1
2012	120,739	\$334	\$38.8	\$5.5	\$44.3
2011	132,504	\$446	\$38.5	\$20.7	\$59.2
2010	129,670	\$612	\$37.0	\$42.5	\$79.5
2009	116,136	\$688	\$30.8	\$49.3	\$80.1
2008	100,670	\$601	\$30.8	\$27.8	\$58.6
2007	93,323	\$510	\$30.5	\$16.1	\$46.6
<i>Arrearage</i>					
2022	20,792	\$997	\$1.2	\$19.5	\$20.7
2021	17,774	\$1047	\$5	\$18.1	\$18.6
2020	12,218	\$779	-	\$9.5	\$9.5
2019	16,115	\$835	-	\$13.5	\$13.5
2018	16,862	\$871	-	\$14.6	\$14.6
2017	14,681	\$925	-	\$13.6	\$13.6
2016	16,321	\$1,002	-	\$16.3	\$16.3
2015	17,815	\$954	-	\$17.0	\$17.0
2014	22,384	\$944	-	\$21.1	\$21.1
2013	16,423	\$969	-	\$15.9	\$15.9
2012	14,011	\$929	-	\$13.0	\$13.0
2011	19,243	\$931	-	\$17.9	\$17.9
2010	30,078	\$1,025	-	\$30.8	\$30.8
2009	22,295	\$936	\$1.5	\$19.4	\$20.9
2008	7,957	\$801	\$1.5	\$4.9	\$6.4
2007	10,486	\$486	\$1.5	\$3.6	\$5.1

Source: Maryland Department of Human Services, Family Investment Administration, Office of Home Energy Programs

Note 1: The benefit expenditures for FY2022 are net expenditures and exclude any adjustments made thereafter in the State Financial Management Information System (FMIS). The households served data are from the OHEP Data System. The data may not be final and are for information purposes only.

Note 2: Benefit expenditures for the years prior to FY 2014 include supplemental benefit payments. Average benefit calculation does not include the supplemental amount.

Table 2. MEAP Summary Data FY 2003-2022

Program and Year	Applicants Served	Average Grant	Benefit Expenditures
2022	77,703	\$822	\$63.8 million
2021	85,545	\$508	\$43.4 million
2020	88,590	\$575	\$50.8 million
2019	96,298	\$590	\$56.8 million
2018	97,477	\$565	\$55.1 million
2017	98,938	\$541	\$53.5 million
2016	104,491	\$566	\$59.1 million
2015	111,365	\$518	\$57.7 million
2014	118,107	\$511	\$60.3 million
2013	113,787	\$512	\$58.2 million
2012	123,868	\$474	\$57.6 million
2011	132,789	\$451	\$60.3 million
2010	134,691	\$309	\$44.6 million
2009	122,254	\$553	\$67.2 million
2008	93,147	\$450	\$41.9 million
2007	99,982	\$422	\$42.1 million
2006	89,108	\$366	\$32.6 million
2005	82,688	\$329	\$27.2 million
2004	80,509	\$269	\$21.6 million
2003	77,828	\$406	\$31.6 million

Source: Maryland Department of Human Services, Family Investment Administration, Office of Home Energy Programs

Note: 1: In FY2012, a MEAP supplemental benefit of \$18.9 million was issued to 93,265 households.

Note: 2: In FY2013, a MEAP supplemental benefit of \$13.8 million was issued to 81,761 households.

Note 3: In FY2014, a MEAP supplemental benefit of \$8.3 million was issued to 87,125 households.

Note 4: In FY2017, a MEAP supplemental benefit of \$18 million was issued to 88,752 households.

Note 5: In FY2021, a MEAP supplemental benefit of \$19 million was issued to 25,728 households.

Note 6: In FY2022, A MEAP supplemental of \$ 36.3 million was issued to 63,993 households.

Table 3. EUSP Supplemental Benefit Data FY2022

Benefit Level	Supplemental Benefit Amount	Households Receiving Benefit	Total
1	\$225	20,876	\$ 4,697,100.00
2	\$200	14,931	\$ 2,986,200.00
3	\$175	15,823	\$ 2,769,025.00
4	\$150	7,881	\$ 1,182,150.00
5	\$150	20,361	\$ 3,054,150.00
Total	-	79,872	\$ 14,688,625.00

Administrative Operations

OHEP & Local Administering Agency Office Operations

Twenty local administering agencies (LAAs) throughout Maryland receive and process EUSP applications. Applications are received by the LAAs through the mail, e-mail or fax, drop-offs, in-person face-to-face interviews, outreach events, and online through the myDHR website.

LAAs perform all of the necessary functions to provide EUSP benefits. These functions include:

- Conducting outreach to the target population to increase awareness of the program
- Receiving applications, which includes reviewing, processing, and verifying the supporting documentation provided, and in some cases, includes conducting in-person interviews
- Responding to crisis situations (termination notice or off-service) by initiating contact with a utility company to prevent or restore terminated service
- Determining eligibility for OHEP and designating benefit amounts
- Generating the required Energy Delivery Statement (EDS) for payment
- Processing bulk fuel payments
- Facilitating requests for additional assistance when required by referring applicants to other agencies or organizations which provide energy assistance

The state OHEP office performs the following functions:

- Program planning and budgeting
- Policy and procedure development
- Outreach support
- Training
- Procurement
- Monitoring and quality control
- Processing utility payments
- Development and implementation of technology systems

The state OHEP office processes payments to utilities for the applications approved by the LAAs. OHEP generates payment transmittal documents that serve as requests for payment. The payment transmittals are sent to the DHS Fiscal Office (Accounts Payable) which then enters the requests into the State's Financial Management Information System (FMIS). The Office of the Comptroller processes the requests for the issuance of payments, either by check or electronic transfer of funds.

The state OHEP office processes payment requests for each utility on a weekly basis beginning in August. For the major utilities, benefit data is transferred electronically through the use of a Secure File Transfer Protocol (SFTP). DHS and its contractor use FTP as a secure method for transferring confidential data, providing each utility with a username and password to log in weekly to retrieve their data.

Frequent communication between OHEP, the LAAs, utilities, and stakeholders is essential to support the effort to provide timely and accurate dissemination of policy updates and facilitate prompt resolution of policy concerns and operational issues. Communication is conducted through the following means:

- OHEP Data System screen messages to announce changes to the system and provide important alerts

- Regular LAA conference calls run by OHEP to keep LAAs informed of new program developments and to identify policy and operational concerns
- Annual Meeting and Training held each May with LAAs to communicate important program information and provide opportunities for networking and sharing of best practices
- OHEP Regional Meetings with utilities and LAAs to review regional approaches and issues
- Attendance at BGE quarterly partnership meetings with OHEP, LAAs, fuel funds, and other stakeholders
- Attendance by OHEP and/or LAAs at annual meetings with Delmarva Power, Potomac Edison, PEPCO and Southern Maryland Electric Cooperative

Table 4 displays the history of administrative expenditures for EUSP. OHEP Administrative expenses are funded through both EUSP ratepayer funds and LIHEAP funds. Certain restrictions apply to both sources. LIHEAP funds restrict administrative expenditures to a maximum of 10 percent of the final LIHEAP allocation. EUSP ratepayer funds are limited to 12 percent of the allocation by Commission Order. Detailed administrative allocations by county are provided in **Attachment F**.

Table 4. EUSP Administrative Expenditures FY 2007-2022

Fiscal Year	EUSP Administrative Expenditures
2022	\$6,247,586
2021	\$6,097,368
2020	\$4,872,302
2019	\$4,562,663
2018	\$4,893,703
2017	\$4,382,692
2016	\$4,428,502
2015	\$4,440,000
2014	\$4,284,029
2013	\$3,990,577
2012	\$4,769,195
2011	\$4,625,792
2010	\$4,423,559
2009	\$3,606,818
2008	\$3,355,617
2007	\$3,282,598

Source: Maryland Department of Human Services, Family Investment Administration, Office of Home Energy Programs

OHEP Data System

All OHEP applications are processed through the centralized OHEP Data System. The Data System is a statewide database and incorporates all the functions necessary for processing applications. DHS maintains a contract for system hosting in order to assure continuous access and functionality. A software maintenance and enhancement contract ensures that the system software is updated and enhanced to accommodate new policy requirements and changing user needs. Constant monitoring and maintenance of the system ensures system availability around the clock.

Access to the OHEP Data System is secure through either the DHS network, or through DHS's Virtual Private Network (VPN). The VPN system allows application intake to be done at off-site locations.

OHEP maintains a web link to give the general public the ability to check their application status on-line at <https://myohepstatus.org/>.

myMDTHINK

MyMDTHINK is DHS's on-line application system (<https://mymdthink.maryland.gov/>) and allows the public to apply for the following programs:

- Food Supplement Program (FSP, formerly known as Food Stamps)
- Office of Home Energy Programs (OHEP)
- Temporary Cash Assistance (TCA)
- Temporary Disability Assistance Program (TDAP)
- Medical Assistance Long Term Care (LTC)
- Child Care Subsidy Program (CCSP)

Energy assistance applications received through myMDTHINK are imported directly into the OHEP Data System by staff on a daily basis. In FY 2022, OHEP received 36,370 applications through myMDTHINK.

Program Summary

Bill Payment Assistance

Table 5 shows the distribution by poverty level for Bill Payment Assistance recipients. The data demonstrates that EUSP is successfully serving the neediest applicants by providing the largest percentage of benefits to households in the two lowest poverty levels.

Table 5. Distribution of EUSP Recipients by Poverty Level

% of Federal Poverty Level	Poverty Levels				Total
	0-75%	Over 75%-110%	Over 110%-150%	Over 150%-175%	
Recipients	1	2	3	4	
FY 2022	29,936	21,773	19,358	8,022	79,953
FY 2021	31,832	22,766	20,682	8,360	83,702
FY 2020	28,797	24,808	22,206	8,268	84,079
FY 2019	33,163	26,664	23,771	9,925	93,523
FY 2018	34,991	26,175	23,784	9,705	94,655
FY 2017	35,540	26,755	24,142	9,997	96,434
FY 2016	40,498	27,156	25,114	10,179	102,947
FY 2015	42,138	29,652	26,481	10,824	109,095
FY 2014	44,398	32,028	28,149	11,089	115,664
FY 2013	42,664	30,688	27,237	10,699	111,288
FY 2012	46,102	32,888	29,586	12,163	120,739
FY 2011	50,751	34,667	32,514	14,105	132,037
FY 2010	48,242	34,091	32,678	14,480	129,671
FY 2009	42,328	31,898	28,878	13,038	116,142
FY 2008	37,709	27,765	24,746	10,222	100,442
% of Distribution					
FY 2022	37.4%	27.2%	24.2%	10.0%	100.0%
FY 2021	38.0%	27.2%	24.7%	9.9%	100.0%
FY 2020	34.2%	29.6%	26.4%	9.8%	100.0%
FY 2019	35.5%	28.5%	25.4%	10.6%	100.0%
FY 2018	37.0%	27.6%	25.1%	10.3%	100.0%
FY 2017	36.9%	27.7%	25.0%	10.4%	100.0%
FY 2016	39.3%	26.4%	24.4%	9.9%	100.0%
FY 2015	38.6%	27.2%	24.3%	9.9%	100.0%
FY 2014	38.4%	27.7%	24.3%	9.6%	100.0%
FY 2013	38.4%	27.5%	24.4%	9.7%	100.0%
FY 2012	38.2%	27.2%	24.5%	10.1%	100.0%
FY 2011	38.4%	26.3%	24.6%	10.7%	100.0%
FY 2010	37.3%	26.3%	25.2%	11.2%	100.0%
FY 2009	36.4%	27.5%	24.9%	10.2%	100.0%
FY 2008	37.5%	27.6%	24.6%	11.2%	100.0%

Source: Maryland Department of Human Services, Family Investment Administration, Office of Home Energy Programs

Note 1: Attachment A displays application data and recipient data for each jurisdiction.

Arrearages

In recent years, OHEP has not used EUSP Ratepayer funds to provide the Electric Arrearage Retirement Assistance. All electric arrearage requests are satisfied with SEIF funding.

Historically, arrearage benefits were allowed only once in a lifetime. This restriction was modified in FY 2010 to allow for additional benefits after a period of seven years following the receipt of Arrearage Retirement Assistance, pursuant to Md. Code Ann., Public Utilities § 7-512.1(a)(2). To be eligible for an Electric Arrearage Retirement Assistance benefit, a household must have a past due electric account balance of \$300. The maximum benefit over a five-year period is capped at \$2,000. Applicants requiring additional assistance over the \$2,000 EUSP cap are referred to community-based programs for assistance.

In FY 2014, OHEP instituted a new arrearage waiver policy allowing ‘vulnerable households’ who received \$800 or less in Electric Arrearage Retirement Assistance during the past five years to apply for additional funds, not to exceed the \$2,000 cap. Vulnerable households are those with a member over the age of 65, under the age of 2, or medically fragile. In FY 2022 a total of 132 waivers were granted providing benefits totaling \$109,149.

In FY 2019, OHEP instituted the Gas Arrearage Retirement Program using MEAP funding to address past due amounts for natural gas service. The Gas Arrearage Retirement Program operates within the same parameters as the electric program (between \$300 and \$2,000; once every five years, with certain waivers available). The benefits distributed through this program are provided in the attached Household and Benefit Level Report.

It should be noted that the arrearage amounts reported represent only the past due amounts addressed with the specific electric and gas arrearage benefit programs. EUSP Bill Payment and MEAP funds can also be applied to past due amounts in certain circumstances. The total amount of OHEP benefits applied to past due amounts is not known.

MD Code, Public Utilities, § 7-512.1 passed during the 2021 legislative session amended the cap from seven to five years allowing a family to access arrearage benefits two years earlier than previously. The legislation also held harmless any arrearage assistance received during the 2020 and 2021 program years. Undoubtedly, this contributed to the lower Vulnerable Population Waiver granted as less were needed due to these two changes.

Applications Denied Due to 5-Year Rule

<u>Agency Name</u>	<u>Total Denied Applications</u>
ALLEGANY COUNTY HUMAN RESOURCES DEVELOPMENT COMMISSION, INC.	236
ANNE ARUNDEL COUNTY COMMUNITY ACTION AGENCY INC	142
BALTIMORE CITY MOHS	491
BALTIMORE COUNTY DEPT OF SOCIAL SERVICES	1761
CAROLINE COUNTY DEPT OF SOCIAL SERVICES	180
CECIL COUNTY DEPT OF SOCIAL SERVICES	11
COMMUNITY ACTION COUNCIL OF HOWARD COUNTY, MD, INC.	21
DORCHESTER COUNTY DEPT OF SOCIAL SERVICES	22
FREDERICK COMMUNITY ACTION AGENCY	48
GARRETT COUNTY, MARYLAND, COMMUNITY ACTION COMMITTEE, INC.	15
HARFORD COMMUNITY ACTION AGENCY, INC.	22
HUMAN SERVICE PROGRAMS OF CARROLL COUNTY INC	4
KENT COUNTY DEPT OF SOCIAL SERVICES	93
MONTGOMERY COUNTY DEPT OF HEALTH AND HUMAN SERVICES	633
NEIGHBORHOOD SERVICE CENTER, INC.	1
PRINCE GEORGES COUNTY DEPT OF SOCIAL SERVICES	38
QUEEN ANNES CO DEPT OF SOCIAL SERVICES	45
SHORE UP! INC	6
SOUTHERN MARYLAND TRI-COUNTY COMMUNITY ACTION COMMITTEE INC	38
WASHINGTON COUNTY CAC	124
Total :	3932

Outreach, Education and Customer Service

In FY 2022 outreach activities conducted by the LAAs reached customers using a variety of methods which included: mass mailing of applications and brochures to customers who applied the previous year, presentation of the program at various events and organizations, table displays of program information at fairs, community events, businesses, schools, faith-based organizations, disability agencies, senior centers/housing, and visits to homebound or disabled applicants.

Partnerships

In FY 2022 OHEP continued to collaborate with utility companies. OHEP attended the Delmarva Energy Summit, multiple BGE Partnership meetings, and the Potomac Edison Annual Energy Assistance Meeting, where information about program funding and customer participation issues was shared among partners, including the Fuel Fund of Central Maryland. OHEP continues to work closely with the Maryland Public Service Commission (PSC), Office of External Relations to help customers negotiate payments and work towards service restoration and to handle rule violations. OHEP, along with other partner agencies, attended the annual Power in the Park event to raise awareness of energy assistance in the DC metro area. In addition, OHEP partners with the Office of People's Council, United Way of Central Maryland, The Fuel Fund of Maryland, the Maryland Department of Housing and Community Development Weatherization Program, and the Maryland Department of Aging/Disabilities.

In FY2022 OHEP worked closely with BGE to develop an application programming interface (API) to provide a path for customers calling their utility regarding challenges paying their bill to apply immediately through the utility customer call center. Through this process, high level information is collected from the customer and subsequently transferred to OHEP through an overnight batch process. Once an application receives a signature through this process, their account is immediately protected from termination while the local office processes the application. This process is set to go live in early program year 2023.

Outreach Activities

OHEP continues to refine the Local Administering Agency annual outreach plan process in order to enhance the focus of outreach efforts on specific populations. These plans serve as the framework for the deployment of previously budgeted outreach funds and the request for EUSP supplemental outreach funds. The coupling of the overall outreach strategy with a request for additional funds provides a clear incentive for Local Administering Agencies to develop plans responsive to focus areas.

One of the focus areas has been households with children under age 6. Outreach plans without clear strategies for improving service to this population through collaborations with local school systems, Head Start, Judy Centers, and child care operations are returned for revision and resubmission for approval. This process resulted in clear strategies built on strong partnerships.

The OHEP redetermination process launched in fiscal year 2019 will continue to improve participation rates among households with an individual with disabilities and households with an individual over age 60 as Local Administering Agencies become more comfortable with the process. The redetermination process allows seniors and disabled applicants that applied the previous year to receive a pre-filled simplified OHEP application. These households simply need to sign and return the application to OHEP for eligibility verification. By simplifying the process for up to 20,000 households with seniors and disabled applicants, more resources can be dedicated to further improving outreach to those that have not applied for benefits. OHEP

encouraged the use of redeterminations to expedite the application process ahead of legislatively mandated changes that will standardize the redetermination process Statewide in program year 2023.

The Critical Medical Needs Program (CMNP), officially launched October 1, 2019, is an important element of outreach to households with individuals categorized as disabled. OHEP expanded the Navigator base to more than 530 individuals working in hospitals and cancer centers to help patients gain access to benefits. The further expansion of the base of Navigators in the coming years will increase access among this population.

Customer Service

The vast majority of customer calls in FY 2022 were received directly by local OHEP agencies. In FY 2016, DHS implemented a new revamped central Call Center as the point of entry for customers inquiring about energy assistance services. The Call Center has a sophisticated IVR (Interactive Voice Response System) that provides application status information similar to that available on MyOHEPStatus.org. Customer service representatives are trained and given access to the OHEP database to relay information to customers and connect them to their local office as needed. The Call Center continues to improve customer service, provide better oversight and tracking of responses, and allows local agencies to focus time on processing applications.

During FY2022 OHEP chaired the “Low Income Household Utility Assistance Workgroup” where a series of recommendations were made to by partner agencies, advocacy groups, legislators, and utilities to support a more streamlined customer experience. While many of these recommendations have been instituted for the FY23 program year, many more continue to be implemented in light of the ongoing systems changes.

Responses to Statutory Questions

Md. Code Ann., Public Utilities § 7-512.1(c) (1) requires that the Commission shall report to the General Assembly on the Electric Universal Service Program. Below are the statutory requests (*in bold italics*) and OHEP's responses and recommendations.

(i) subject to subsection (d) of this section, a recommendation on the total amount of funds for the program for the following fiscal year based on:

1. the level of participation in and the amounts expended from the universal service program during the preceding fiscal year;

RESPONSE:

In FY 2022, applications for EUSP Bill Payment Assistance decreased by 20% from the previous year. FY 2022 EUSP Bill payment benefit expenditures totaled \$44 million.

OHEP RECOMMENDATION:

Projections indicate that sufficient funding is available for benefit requests anticipated in FY 2023. OHEP will work with its Advisory Board and other stakeholders to closely monitor funding availability.

How bill assistance and arrearage retirement payment to customers were calculated during the preceding fiscal year;

RESPONSE:

The formula for calculating the EUSP benefit amount is:

$$\text{Annual kWh usage} \times \text{Average Cost per kWh} \times \text{Utility Index} \times \text{poverty level percentage} = \text{Benefit}$$

Benefits are calculated based on a formula developed by OHEP to equitably distribute benefits. The formula uses a customer's total household income and electric usage to calculate the benefit level, ensuring that households with the lowest income and highest usage receive the greatest benefit. Benefit levels vary according to the poverty level of the recipient. There are four benefit levels based on four levels of poverty: 0-75 percent, 76-110 percent, 111-150 percent, and 151-200 percent. A fifth benefit level was established for those living in subsidized housing. Subsidized housing households receive the lowest benefit, based on the assumption that the housing subsidy provides some degree of assistance with energy costs. Pursuant to Md. Code Ann., Public Utilities § 7-512.1(a)(2), households with one or more members over the age of 67 years with household incomes between 175- 200 percent of the federal poverty level. These newly eligible households fall into the fourth benefit level.

Electric usage data is collected from the utility for each customer upon application. The electric usage data for the applicant and the cost of electricity per kilowatt-hour are used to calculate an estimated annual cost of electricity for the applicant. Recognizing that there are cost variations for electricity among utilities, the cost calculation is adjusted based on the customer's electric supplier. The annual cost of electricity and the

household's poverty level or subsidized housing status if applicable, are the factors used to calculate the benefit. This methodology of calculating benefits ensures that program funding is distributed equitably to those with the most pressing needs, based on income and usage.

OHEP RECOMMENDATION:

OHEP recommends continuing to use the current methodology for calculating benefits. The current methodology customizes the benefit to the needs of the individual recipient, allows for equitable distribution of funds, and allows for the integration of a MEAP benefit without duplication.

OHEP began compiling new LIHEAP performance measures in FY2016 focused on household energy burden. Through FY 2021, the LIHEAP performance measures indicate that the current methodology for calculating energy assistance benefits in Maryland is effective at reducing energy burdens and targeting benefits to those households with the highest energy burdens.

The projected needs for the bill assistance and the arrearage retirement components of the universal service program for the next fiscal year; and

RESPONSE:

OHEP will closely monitor the following factors that could trigger the need to reexamine EUSP funding levels:

- Enrollment trends;
- Changes in the number of families experiencing poverty;
- Market-based electric rates;
- Higher demand for electricity resulting from an increasing number of products that require electricity;
- Potential higher demand based on the possibility of a colder than normal winter;
- Capacity of administrative units to handle the flow of growing numbers of applications;
- Fluctuating fuel costs; and
- Economic factors such as the loss of employment and reduction in income.

OHEP RECOMMENDATION:

OHEP projects that \$70 million for bill assistance and arrearage benefit assistance is adequate to meet the demand for assistance FY 2023. Based on current projections, it is likely that OHEP will maintain the current service level to serve all households at the previous year's benefits levels. OHEP will continue to monitor the funding outlook for FY2023 and beyond to identify potential funding shortfalls and benefit level adjustments.

The amount of any bill assistance or arrearage retirement surplus carried over in the electric universal service program fund under subsection (f) (6) (i) of this section;

RESPONSE:

During the fiscal year 2022, the collection of ratepayer funds for EUSP did not exceed the appropriated amount. The recent tariff revisions returned the EUSP fund balance to \$0 by July 2020 and collections have not exceeded the statutory limit during the last two fiscal years

	<u>Total Collection</u>	<u>Statutory Limit</u>	<u>Excess Collection</u>
FY2022	\$32,060,743	\$37,000,000	\$(4,939,257.48)

OHEP RECOMMENDATION:

The authorization to expend funds over-collected between FY 2010 and FY 2017 combined with the current reduced monthly EUSP surcharge will eliminate the surplus collections in the EUSP ratepayer fund. The rate of collection will have to be examined to ensure adequate funding is collected in ongoing.

(ii) for bill assistance, the total amount of need, as determined by the Commission, for electric customers with annual incomes at or below 175% of the federal poverty level and the basis for this determination;

RESPONSE:

Demand for energy assistance in Maryland has been steady since the end of the recession. The target population at or below 175% of the federal poverty level in Maryland is approximately 382,993 households. Approximately 26% of all eligible households receive EUSP benefits. The participation rate varies significantly between counties with 14% participating in EUSP in Montgomery County and almost 50% of eligible households participating in Allegany and Garrett. The U.S. Census Bureau American Community Survey (2014-2016) is the source for estimates on the target population.

Per the LIHEAP Data Warehouse, the average participation rate in energy assistance benefit programs involving LIHEAP assistance is 17% and the median is 16%. The highest participation rate recorded for federal fiscal year 2017, the most recent year for which information is available, is New Your State’s 43.8%.

OHEP RECOMMENDATION:

OHEP is focused on streamlining the process for those that choose to apply for energy assistance. OHEP implemented a number of new initiatives to improve access, including year-round processing of applications and a streamlined application process for fixed income households. OHEP is working to integrate energy assistance eligibility determination and enrollment with other benefit programs. Legislative changes needed to align program eligibility criteria with programs such a SNAP, MA, SSI, TANF and other means tested programs having been explored through the Low Income Utility Workgroup and OHEP will support any legislative action to enable such.

(iii) the amount of funds needed, as determined by the Commission, to retire arrearages for electric customers who have not received assistance in retiring arrearages under the electric universal service program within the preceding 7 fiscal years and the basis for this determination;

RESPONSE:

Demand for Electric Arrearage Retirement Assistance has increased as the statutory requirement that customers not receive arrearage retirement benefits in the preceding 7 fiscal years has been amended to only account for the preceding 5 fiscal years. Additionally, customers are held harmless for any arrearage assistance received in FY20 and FY21.

OHEP RECOMMENDATION

OHEP recommends that \$20 million of MSEIF (RGGI) funding be made available to support the EUSP Arrearage Retirement Assistance program in FY 2022.

(iv) the amount of funds needed, as determined by the commission, for bill assistance and arrearage retirement, respectively, for customers for whom income limitations may be waived under subsection (a) (7) of this section, and the basis for each determination;

RESPONSE

Waivers are subject to specific guidelines developed by the Office of Home Energy Programs and apply to determinations made for the Maryland Energy Assistance Program with the continuation of income guidelines at the 175% level.

OHEP RECOMMENDATION:

OHEP recommends maintaining the current policy. No funds are required for this purpose.

(v) the impact on customers' rates, including the allocation among customer classes, from collecting the total amount recommended by the Commission under item (i) of this paragraph;

RESPONSE:

The ratepayer funds collected for EUSP, combined with SEIF/RGGI funding and supplemented with LIHEAP “cooling” assistance, have been sufficient to cover the annual demand for electric bill payment assistance.

OHEP RECOMMENDATION:

OHEP will continue to monitor the funding outlook to identify any potential funding shortfalls.

(vi) the impact of using other federal poverty level benchmarks on costs and the effectiveness of the Electric Universal Service Program.

RESPONSE:

The Low-Income Home Energy Assistance Program (LIHEAP) Block Grant legislation sets income eligibility at a maximum of 150% of federal poverty level or 60% of state median income, whichever is higher. Maryland sets maximum income eligibility at 175% of federal poverty level for MEAP, which is lower than the state’s 60% state median income level. The income eligibility maximum was set at 175% of poverty level for MEAP to match the EUSP guidelines and to streamline the application process for the programs.

OHEP is working to integrate energy assistance eligibility determination and enrollment with other benefit programs. Legislative changes needed to align program eligibility criteria with programs such as SNAP, MA, SSI, TANF and other means tested programs having been explored through the Low Income Utility Workgroup and OHEP will support any legislative action to enable such.

OHEP RECOMMENDATION:

To facilitate this administrative and eligibility change, OHEP would expect income eligibility guidelines for MEAP and EUSP to be matched at 200% of the poverty level.

Md. Code Ann., Public Utilities § 7-512.1(c)(2) requires that the Office of Home Energy Program shall annually report to the Commission the following information.

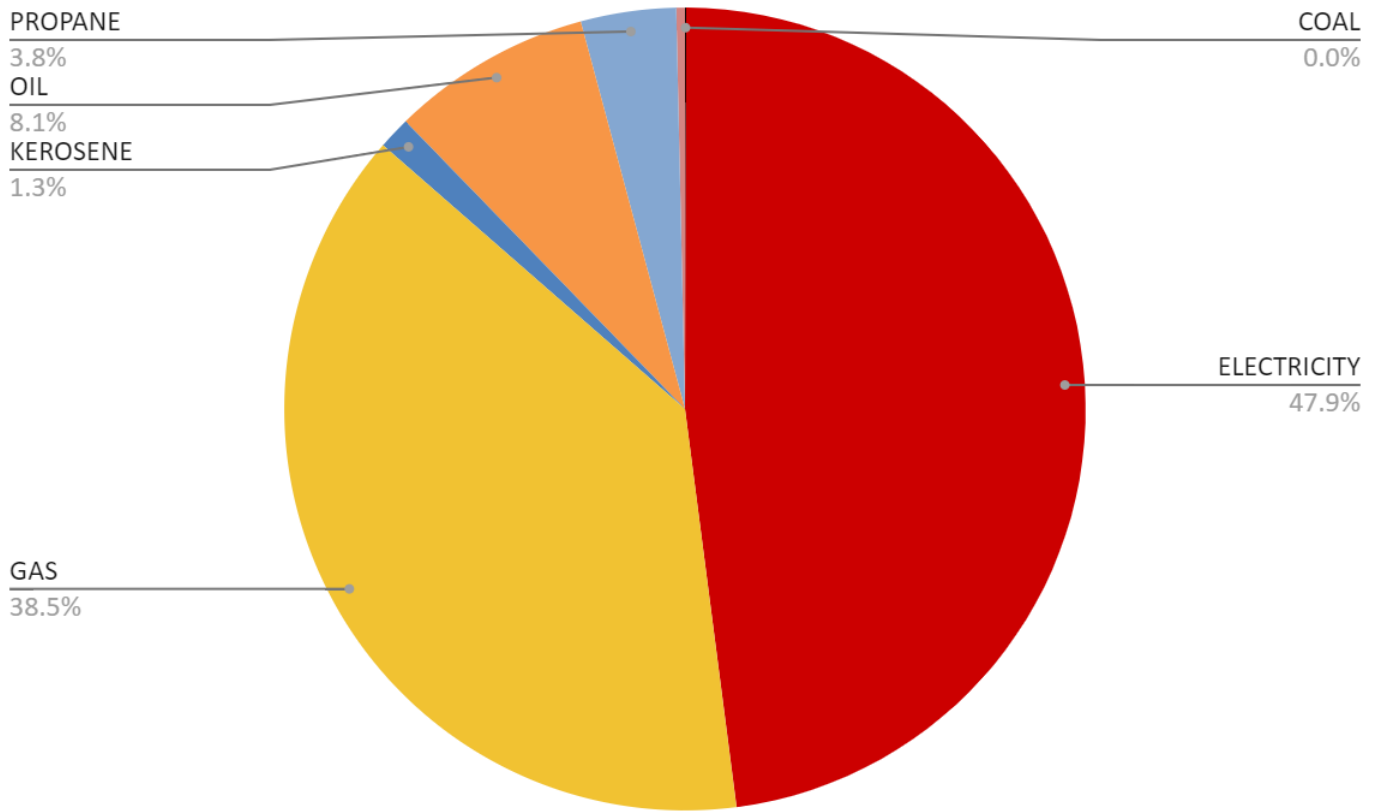
the number of customers and the amount of distributions made to fuel customers under the Maryland Energy Assistance Program established under Title 5, Subtitle 5A of the Human Services Article, identified by funding source and fuel source;

RESPONSE:

The source of MEAP funding is the federal Low-Income Home Energy Assistance Program (LIHEAP) Block Grant. 77,703 customers received assistance through MEAP in FY 2022. State fiscal year 2022 benefit expenditures for MEAP totaled to \$63,800,000 million. The following table and chart provides the number of recipients by fuel type:

MEAP by Fuel Type

COAL	377
ELECTRICITY	39,287
GAS	31,544
KEROSENE	1,069
OIL	6,635
PROPANE	3,153
WOOD	286



OHEP RECOMMENDATION:

None required.

the cost of outreach and education materials provided by the Office of Home Energy Programs for the electric universal service program;

RESPONSE:

The OHEP State Office partners with the Local Administering Agencies (LAAs) and with other various organizations, to conduct a broad range of outreach activities.

OHEP has reserved \$200,000 in FY 2023 budget to conduct various supplemental outreach activities. It should be noted that most LAAs build outreach and education activities into their annual operating budgets.

OHEP RECOMMENDATION:

Outreach efforts will continue to ensure that all eligible households are aware of the availability of energy assistance. Strategies such as the redetermination process for fixed-income households and year-round processing of applications reduce burdens on applicants and local agencies to ensure improved access for the most vulnerable populations.

3. the amount of money that the Department of Human Services receives, and is projected to receive, for low-income energy assistance from:

- A. the Maryland Strategic Energy Investment Fund under §9-20B-05 of the State Government Article;**
- B. with respect to electric customers only, the Maryland Energy Assistance Program; and**
- C. any other federal, state, local or private source.**

RESPONSE:

For FY 2022 OHEP received the following amounts of funding:

- Maryland Strategic Energy Investment Fund – OHEP anticipated having \$22,400,000 available through the SEIF.
- Low Income Home Energy Program/Maryland Energy Assistance Program – For Federal Fiscal Year 2022, the LIHEAP allocation to Maryland is approximately \$78 million.
- Other Federal, State, Local or Private Source – in 2019, OHEP began receiving \$400,000 annually from the Dominion Cove Point settlement. These funds will be received for twenty years.

(ii) The Office of Home Energy Programs may satisfy the reporting requirement of subparagraph (i)1 of this paragraph by providing the commission with a copy of material that contains the required information and that the Office of Home Energy Programs submits to a unit of the federal government.

RESPONSE:

Attachment F is the LIHEAP Households Report for FY2022 that will be submitted to the federal government. Please note that the majority of the households included in the counts under LIHEAP also received benefits under EUSP.

Attachments

Attachment A: Annual Intake and Approved Applications by County
FY2021 (7/1/2021-6/30/2022)

COUNTY	Total Applications	MEAP				Bill Assistance				Electric Arrearage Retirement Assistance				Gas Arrearage Retirement Assistance				USPP Applied
		Applied	Approved	Total Benefits	Average	Applied	Approved	Total Benefits	Average	Applied	Approved	Total Benefits	Average	Applied	Approved	Total Benefits	Average	
Allegany	3,896	3,750	2,817	\$2,922,280.85	\$ 1,037.37	3,823	2,872	\$ 1,772,867.00	\$ 617.29	1,715	590	\$ 555,994.29	\$ 942.36	886	393	\$ 383,379.20	\$ 975.52	1193
Anne Arundel	5,389	5,685	3,520	\$2,703,091.99	\$ 767.92	5,073	3,334	\$ 2,753,229.00	\$ 825.80	2,249	1068	\$ 1,007,349.13	\$ 943.21	756	313	\$ 205,101.36	\$ 655.28	1658
Baltimore City	22,813	23,736	15,320	\$13,654,327.00	\$ 891.27	22,457	14,488	\$ 10,153,584.00	\$ 700.83	10,809	4,618	\$ 4,071,525.14	\$ 881.66	5,992	3,048	\$ 2,509,936.23	\$ 823.47	7156
Baltimore County	14,785	15,571	8,877	\$6,891,494.00	\$ 776.33	15,048	8,614	\$ 6,536,663.00	\$ 758.84	12,412	3,058	\$ 2,708,397.26	\$ 885.68	6,330	1,713	\$ 1,145,551.62	\$ 668.74	1085
Calvert	794	827	562	\$458,371.40	\$ 815.61	805	547	\$ 554,794.00	\$ 1,014.25	174	143	\$ 155,811.53	\$ 1,089.59	15	9	\$ 5,234.23	\$ 581.58	472
Caroline	1,331	1,434	1,016	\$877,792.50	\$ 863.97	1,403	994	\$ 863,958.00	\$ 869.17	760	196	\$ 183,015.53	\$ 933.75	12	0	\$ -	\$ -	598
Carroll	2,188	2,239	1,736	\$1,317,266.34	\$ 758.79	2,206	1,721	\$ 1,298,718.00	\$ 754.63	288	198	\$ 229,879.12	\$ 1,161.01	45	26	\$ 17,920.79	\$ 689.26	1056
Cecil	3,286	3,408	2,882	\$2,414,134.00	\$ 837.66	3,306	2,797	\$ 2,342,995.00	\$ 837.68	1,306	1001	\$ 1,197,015.61	\$ 1,195.82	74	31	\$ 20,291.89	\$ 654.58	2910
Charles	1,791	1,871	1,309	\$1,119,548.73	\$ 855.27	1,826	1,275	\$ 1,278,434.00	\$ 1,002.69	390	299	\$ 328,980.86	\$ 1,100.27	42	29	\$ 25,597.39	\$ 882.67	1131
Dorchester	2,231	2,316	1,770	\$1,461,747.00	\$ 825.85	2,278	1,754	\$ 1,495,760.00	\$ 852.77	645	445	\$ 497,750.13	\$ 1,118.54	40	17	\$ 7,357.54	\$ 432.80	919
Frederick	2,945	2,988	2,305	\$1,603,326.50	\$ 695.59	2,954	2,287	\$ 1,513,524.00	\$ 661.79	721	446	\$ 347,858.72	\$ 779.95	181	71	\$ 53,314.67	\$ 750.91	124
Garrett	1,747	1,816	1,563	\$1,804,718.50	\$ 1,154.65	1,725	1,494	\$ 969,588.00	\$ 648.99	148	97	\$ 81,247.75	\$ 837.61	19	10	\$ 8,318.09	\$ 831.81	0
Harford	4,215	4,470	3,382	\$2,800,565.50	\$ 828.08	4,207	3,219	\$ 2,628,602.00	\$ 816.59	931	628	\$ 595,486.10	\$ 948.23	255	168	\$ 110,669.41	\$ 658.75	3578
Howard	3,405	3,633	2,470	\$1,636,202.50	\$ 662.43	3,535	2,422	\$ 1,986,409.00	\$ 820.15	1,086	621	\$ 596,897.25	\$ 961.19	315	140	\$ 99,436.84	\$ 710.26	1391
Kent	759	759	618	\$583,299.50	\$ 943.85	713	581	\$ 474,474.00	\$ 816.65	284	123	\$ 120,724.23	\$ 981.50	0	0	\$ -	\$ -	687
Montgomery	9,867	9,984	6,672	\$4,304,704.50	\$ 645.19	9,581	6,353	\$ 4,399,082.00	\$ 692.44	5,383	1685	\$ 1,939,646.26	\$ 1,151.13	2,059	382	\$ 334,861.76	\$ 876.60	2440
Prince George's	11,990	11,900	8,015	\$6,813,137.00	\$ 850.05	12,103	8,186	\$ 6,289,727.00	\$ 768.35	4,918	3,247	\$ 3,480,606.87	\$ 1,071.95	1,291	625	\$ 534,151.33	\$ 854.64	673
Queen Anne's	865	861	691	\$621,545.00	\$ 899.49	830	667	\$ 585,156.00	\$ 877.30	301	145	\$ 147,976.02	\$ 1,020.52	0	0	\$ -	\$ -	395
St. Mary's	1,603	1,665	1,260	\$1,153,988.46	\$ 915.86	1,586	1,192	\$ 1,234,702.00	\$ 1,035.82	346	286	\$ 302,527.30	\$ 1,057.79	25	16	\$ 11,648.17	\$ 728.01	988
Somerset	1,393	1,393	1,293	\$1,121,372.50	\$ 867.26	1,359	1,259	\$ 1,129,619.00	\$ 897.24	255	228	\$ 313,769.23	\$ 1,376.18	16	0	\$ -	\$ -	1219
Talbot	1,100	1,100	1,000	\$758,565.00	\$ 758.57	1,083	985	\$ 831,001.00	\$ 843.66	107	105	\$ 84,233.70	\$ 802.23	2	2	\$ 712.21	\$ 356.11	389
Washington	4,406	4,385	3,510	\$2,772,962.20	\$ 790.02	4,412	3,526	\$ 2,178,418.00	\$ 617.82	1,725	559	\$ 434,184.99	\$ 776.72	552	149	\$ 119,096.57	\$ 799.31	1227
Wicomico	4,343	4,273	3,838	\$2,937,520.50	\$ 765.38	4,239	3,812	\$ 3,394,289.00	\$ 890.42	840	683	\$ 595,911.33	\$ 1,384.94	128	52	\$ 33,291.89	\$ 640.23	3841
Worcester	1,624	1,620	1,473	\$1,181,296.50	\$ 801.97	1,575	1,437	\$ 1,294,675.00	\$ 900.96	222	180	\$ 263,859.56	\$ 1,465.89	33	6	\$ 4,827.81	\$ 804.64	1246
TOTAL	108,766	111,684	77,899	\$63,913,257.97	\$ 820.46	108,127	75,816	\$ 57,960,268.00	\$ 764.49	48,015	20,649	\$ 20,590,647.91	\$ 997.17	19,068	7,200	\$ 5,630,699.00	\$ 782.04	36376

Source: Maryland Department of Human Services, Office of Home Energy Programs Statistical Workload Report
Application Report Run Date, November 28, 2022

Attachment B

Distribution of EUSP Grants by KWH Usage Within Benefit Levels

Program: BILL PAYMENT

County: ALL

Vendor: ALL

Year: 2022

<u>KWH Range</u>	<u>Level 1</u>	<u>Level 2</u>	<u>Level 3</u>	<u>Level 4</u>	<u>Level 5</u>	<u>Total</u>
0 - 6000	4,245	3,559	3,562	1,603	7,230	20,202
6001 - 7000	1,394	1,085	1,134	560	1,850	6,022
7001 - 8000	1,425	1,032	1,239	592	1,768	6,055
8001 - 9000	1,339	1,075	1,056	481	1,393	5,344
9001 - 10000	1,277	862	927	484	1,266	4,816
10001 - 11000	1,293	879	936	469	1,020	4,597
11001 - 12000	1,156	787	807	451	847	4,048
12001 - 13000	1,096	673	778	361	766	3,673
13001 - 14000	1,071	625	771	384	685	3,536
14001 - Above	6,657	4,330	4,626	2,522	3,524	21,659
Total	20,953	14,907	15,836	7,907	20,349	79,952

Attachment C- EUSP Monthly Income Eligibility Table

2021- 2022 Income Eligibility Guidelines for OHEP

HOUSEHOLD SIZE	MAXIMUM MONTHLY INCOME STANDARDS NO HOUSEHOLD MEMBERS 67 YEARS+	MAXIMUM YEARLY INCOME STANDARDS NO HOUSEHOLD MEMBERS 67 YEARS+	MAXIMUM MONTHLY INCOME STANDARDS 1 OR MORE HOUSEHOLD MEMBERS 67 YEARS+	MAXIMUM YEARLY INCOME STANDARDS 1 OR MORE HOUSEHOLD MEMBERS 67 YEARS+
1	\$ 1,982	\$ 23,783	\$ 2,265	\$ 27,180
2	\$ 2,670	\$ 32,043	\$ 3,052	\$ 36,620
3	\$ 3,359	\$ 40,303	\$ 3,838	\$ 46,060
4	\$ 4,047	\$ 48,563	\$ 4,625	\$ 55,500
5	\$ 4,735	\$ 56,823	\$ 5,412	\$ 64,940
6	\$ 5,424	\$ 65,083	\$ 6,198	\$ 74,380
7	\$ 6,112	\$ 73,343	\$ 6,985	\$ 83,820
8	\$ 6,800	\$ 81,603	\$ 7,772	\$ 93,260
ADDITIONAL PERSON, ADD	\$ 688	\$ 8,260	\$ 787	\$ 9,440

Attachment D**Living Arrangements by Poverty Level****Program:** BILL PAYMENT**Agency:** ALL**County:** ALL**Year:** 2022

<u>Type of Income</u>	<u>Poverty Level 1</u>	<u>Poverty Level 2</u>	<u>Poverty Level 3</u>	<u>Poverty Level 4</u>	<u>Poverty Level 5</u>	<u>Total</u>
HOMEOWNER	6,371	6,508	7,684	3,118	539	24,220
PUBLIC / SUBSIDIZED	8,957	6,844	3,509	976	75	20,361
RENTER	14,415	8,324	8,095	3,891	247	34,972
SUBMETERED	103	36	40	26	1	206
SUBSIDIZED SUBMETERED	90	61	30	11	1	193
County Totals for: ALL	29,936	21,773	19,358	8,022	863	79,952

OHEP Administrative Expenditures Report - FY 2022

Headquarters Administrative Expenditures	\$	4,492,790
Local Administrative Agency Expenditures	\$	15,618,966
Total	\$	20,111,756
EUSP Share of Admin. Expend. (40%)	\$	8,044,702
MEAP Share of Admin. Expend. (60%)	\$	12,067,054

Local Administrative Agency (LAA) Expenditures

LAA	Expenditures	% of State
Allegany*	\$ 244,269.00	1.6%
Anne Arundel	\$ 586,724.00	3.8%
Baltimore City	\$ 3,686,232.00	23.6%
Baltimore County*	\$ 1,958,317.00	12.5%
Caroline*	\$ 315,427.00	2.0%
Carroll	\$ 366,041.00	2.3%
Cecil*	\$ 330,905.00	2.1%
Dorchester*	\$ 313,992.00	2.0%
Frederick*	\$ 452,057.00	2.9%
Garrett	\$ 426,652.00	2.7%
Harford	\$ 559,656.00	3.6%
Howard	\$ 464,463.00	3.0%
Kent*	\$ 166,248.00	1.1%
Montgomery*	\$ 1,506,927.00	9.6%
Prince George's*	\$ 1,594,506.00	10.2%
Queen Anne's*	\$ 300,638.00	1.9%
<u>Shore Up!</u>		0.0%
Somerset	\$ 191,385.00	1.2%
Wicomico	\$ 381,536.00	2.4%
Worcester	\$ 196,712.00	1.3%
<u>So. Md.</u>		0.0%
Calvert	\$ 161,106.00	1.0%
Charles	\$ 319,799.00	2.0%
St. Mary's	\$ 319,799.00	2.0%
Talbot -NSC	\$ 247,552.00	1.6%
Washington	\$ 528,023.00	3.4%
TOTAL	\$15,618,966	100.0%

* Denotes Local Department of Social Service offices.

LIHEAP Household Report

Date Printed: 11/28/2022 2:16:37 PM

Assisted Households

At Least One Member

<u>Assistance Type</u>	<u>Total Assisted Households</u>	<u>Under 75% Poverty</u>	<u>75%-100% Poverty</u>	<u>101%-125% Poverty</u>	<u>126%-150% Poverty</u>	<u>Over 150% Poverty</u>	<u>60 and Older</u>	<u>Disabled</u>	<u>Age 5 and Under</u>	<u>Age 2 and Under</u>	<u>Age 3 Through 5</u>	<u>60 and Older/ Disabled/Age 5 and Under</u>
Heating	82,045	30,306	16,993	13,703	11,788	9,255	34,598	28,720	13,716	7,215	8,992	58,974
Crisis	4,195	1,840	722	600	539	494	981	1,212	1,011	519	675	2,560
Total:	86,240						35,579	29,932	14,727	7,734	9,667	61,534

Applicant Households

<u>Assistance Type</u>	<u>Application Total</u>	<u>Under 75% Poverty</u>	<u>75%-100% Poverty</u>	<u>101%-125% Poverty</u>	<u>126%-150% Poverty</u>	<u>Over 150% Poverty</u>	<u>No Income</u>
Heating	110,834	48,437	17,398	14,148	12,271	18,580	11,881
Crisis	4,624	2,033	726	605	540	720	161

MARYLAND DEPARTMENT OF HUMAN SERVICES
 FAMILY INVESTMENT ADMINISTRATION
 OFFICE OF HOME ENERGY PROGRAMS

June-21

Year	FY 2021	FY 2022	CHANGE	% CHANGE
	7/1/20 - 06/30/21	7/1/21- 06/30/22	2021- 2022	2021- 2022
Applications YTD*				
Total	148,777	119,135	-29,642	-19.9%
MEAP	145,497	115,811	-29,686	-20.4%
EUSP Bill Payment	136,638	112,247	-24,391	-17.9%
EUSP Arrearage Retirement	58,221	48,966	-9,255	-15.9%
Gas Arrearage Retirement	30,037	19,529	-10,508	-35.0%
Receiving Benefits YTD**				
MEAP	96,298	77,658	-18,640	-19.4%
EUSP Bill Payment	93,523	75,727	-17,796	-19.0%
EUSP Arrearage Retirement	16,115	18,959	2,844	17.6%
Gas Arrearage Retirement	7,428	6,476	-952	-12.8%

NOTE:

*Data represents applications received and entered into the OHEP Data System for the period identified. The total line represents an unduplicated count of all applications. MEAP and EUSP do not add to this total.

**Receiving Benefits means those that have been approved and processed for a benefit, but may not have actually received the benefit at the time of report generation.

***In FY2019, OHEP began processing applications year-round. This includes FY2021 applications received in June 2020.

Application YTD source is Workload Report

Receiving Benefits YTD source is the Dollars and Households by Benefit Level.

Source: Department of Human Services
 Office of Home Energy Programs

MARYLAND DEPARTMENT OF HUMAN SERVICES
 FAMILY INVESTMENT ADMINISTRATION
 OFFICE OF HOME ENERGY PROGRAMS

October-22

Year	FY 2021	FY 2022	CHANGE	% CHANGE
	7/1/20-10/31/21	7/1/21-10/31/22	2021-2022	2021-2022
Applications YTD*				
Total	149,963	120,157	-29,806	-19.9%
MEAP	146,681	116,803	-29,878	-20.4%
EUSP Bill Payment	137,778	113,172	-24,606	-17.9%
Electric Arrearage Retirement	58,450	49,396	-9,054	-15.5%
Gas Arrearage Retirement	29,930	19,613	-10,317	-34.5%
Receiving Benefits YTD**				
MEAP	86,274	77,703	-8,571	-9.9%
EUSP Bill Payment	83,702	79,951	-3,751	-4.5%
Electric Arrearage Retirement	17,512	20,792	3,280	18.7%
Gas Arrearage Retirement	9,407	7,262	-2,145	-22.8%

NOTE:

*Data represents applications received and entered into the OHEP Data System for the period identified.
 The total line represents an unduplicated count of all applications. MEAP and EUSP do not add to this total.

**Receiving Benefits means those that have been approved and processed for a benefit, but may not have actually received the benefit at the time of report generation.

Application YTD source is Workload Report

Receiving Benefits YTD source is the Dollars and Households by Benefit Level.

Source: Department of Human Services
 Office of Home Energy Programs

Attachment H**Distribution Of Household Income****Program:** BILL PAYMENT**Agency:** ALL**County:** ALL**Year:** 2022

<u>Type Of Income</u>	<u>Benefit Level 1</u>	<u>Benefit Level 2</u>	<u>Benefit Level 3</u>	<u>Benefit Level 4</u>	<u>Benefit Level 5</u>
EMPLOYMENT	3882	3560	5277	3681	3457
UNEMPLOYMENT	398	233	221	143	119
TCA	1506	69	10	0	1097
TDAP	221	1	1	0	171
SOCIAL SECURITY	3426	8702	9076	3500	8905
SSI	2400	1364	377	87	3871
VA/PENSION	177	196	300	248	202
ZERO INCOME	4404	17	11	4	944
OTHER	1608	385	300	145	593
SELF-EMPLOYED	696	295	204	82	80
CHILD - NO INCOME	1564	26	28	12	491
CHILD SUPPORT	680	64	34	8	422
Total :	20,962	14,912	15,839	7,910	20,352

ATTACHMENT I- Service Status of Recipients at Time of Application

Supplier	On	Off	Total
Totals For All Electric*	61,863	19,789	81,652
Totals For All Gas	23,089	8,307	31,396

*Includes EUSP and MEAP-only electric