

MARYLAND PUBLIC SERVICE COMMISSION

ELECTRIC UNIVERSAL SERVICE PROGRAM 2024 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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I. Overview

The Electric Universal Service Program (EUSP), enacted in the Electric Customer Choice Act of 1999, 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, required the Maryland Public Service 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 Maryland Department of Human Services (DHS), Family Investment Administration, which administers 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:

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).

Additional reporting requirements include the following:

1. For bill assistance, the total amount of need, as determined by the Commission, for electric customers with annual incomes at or below 200% ¹ of the federal poverty level and the basis for this determination;
2. 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

¹ See PUA §7-512.1(a)(1).

electric universal service program within the preceding five fiscal years, and the basis for this determination.

3. 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 PUA §7-512.1(a)(7), and the basis for each determination;
4. the impact on customers' rates, including the allocation among customer classes, from collecting the total amount recommended by the Commission; and
5. 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:

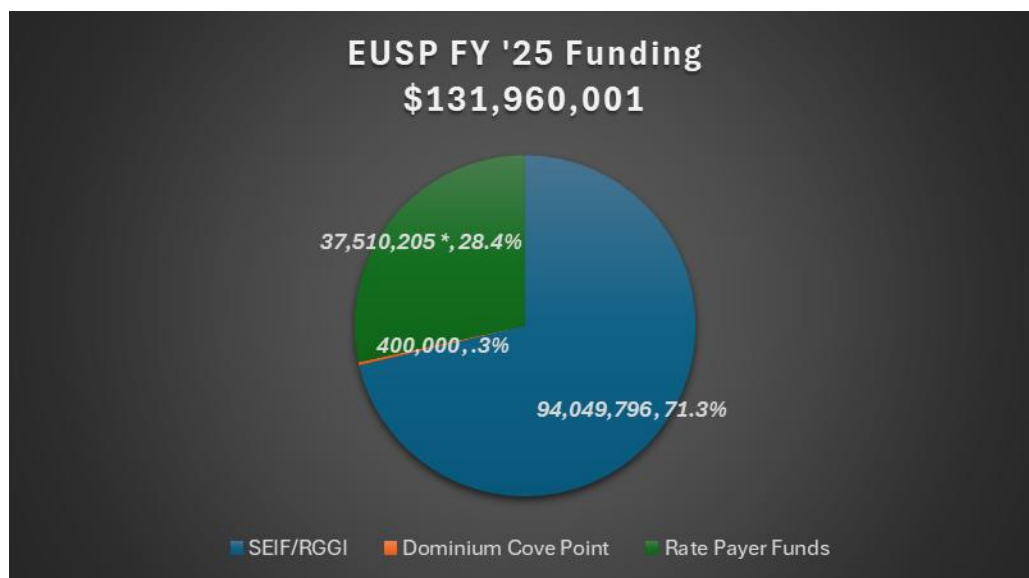
- (1) The number of customers and the amount of distributions made to fuel customers under the Maryland Energy Assistance Program (MEAP) identified by funding source and fuel source;
- (2) the cost of outreach and educational materials provided by OHEP for the EUSP; and
- (3) the amount of money that 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 August 23, 2024, OHEP filed its EUSP Proposed Operations Plan for Fiscal Year 2025. Following receipt of comments from interested parties, a hearing to consider the Proposed Operations Plan was held on October 2, 2024. On December 9, 2024, the Commission approved OHEP's Operations Plan for implementation in FY 2025 and authorized the allocations for FY 2025 proposed by OHEP from ratepayer funding, as provided under PUA §7-512.1(e).²

² Order No. 91441 (December 9, 2024), *In the Matter of the Electric Universal Service Program*.

In Order No. 91441, the Commission noted that OHEP anticipates total funding for the EUSP in FY 2025 to be \$131,960,001 after an addition of \$400,000 in special state funds (Dominium Cove Point), \$94,049,796 from SEIF/RGGI, and \$37,510,205 from ratepayer funds.³



On January 17, 2025, OHEP filed its *FY 2024 Electric Universal Service Program Annual Report* in compliance with PUA §7-512.1(c)(2).

A. OHEP FY 2024 Annual Report

In its Annual Report, OHEP provided highlights pertaining to the operation of the EUSP for the July 1, 2023–June 30, 2024 program year. OHEP’s Annual Report indicates that more households were served by the program for FY 2024 compared to FY 2023. However, the average bill assistance benefit and the average arrearage retirement benefit decreased between the two fiscal years. Benefit expenditures for bill assistance from all sources was \$71,642,510 in FY 2024 as opposed to \$90.4 million the previous year. Expenditures for arrearage retirement were \$32.9 million in 2023 compared to \$31 million from all sources.

³ OHEP clarified in an October 1, 2024 email to the Commission that, despite this entire amount being categorized as collected through ratepayer surcharges, in accordance with PUA 7-512.1(e), \$37 million was collected from ratepayers, while the additional \$510,205 was special funded in Fiscal Year 2024, and again in Fiscal Year 2025 without adjustment.

Table 1: Comparison of EUSP Data for FY 2023 and 2024⁴

	Households Served	Total Benefit Expense	Avg. Grant
Bill Assistance			
FY 2023	96,367	\$90.4 million	\$939
FY 2024	114,230	\$71.6 million	\$628
Difference	+18.7%	-18.8.7%	-33%
Arrearage Retirement			
FY 2023	29,376	\$32.9 million	\$1,123
FY 2024	30,189	\$31.8 million	\$1,030
Difference	2.76%	-3.34%	-9.0%
EUSP Total			
FY 2023	125,743	\$123.3 million	\$981
FY 2024	144,349	\$103.4 million	\$716
Difference	+14.8%	-16.1%	-27.0%

OHEP did not project an enrollment figure or the amount of its bill payment assistance for FY 2025. However, OHEP noted that it expected that current funding levels would be adequate to meet the EUSP needs for FY 2025 due to changes in the maximum EUSP bill payment and MEAP benefits for that period. This change is necessary to ensure that as many Marylanders as possible can be served. In light of OHEP’s experience with increased enrollments due to categorical eligibility (in which participants eligible for other low income assistance programs are deemed eligible for EUSP benefits), it seems likely that enrollments will continue to grow. In FY 2024, \$71,642,510 went to fund bill payment assistance. Ratepayer funds and MEAP supported EUSP’s bill payment assistance. Arrearage retirement was funded by SEIF/RGGI monies.

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 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 funded by MEAP in FY 2024 totaled \$68.0 million plus \$5,275,998 in smaller grants that went to households receiving Supplemental Nutrition Assistance Program (SNAP) benefits.

The MEAP program also experienced numerous changes in 2024. On April 22, 2024, the Commission was alerted by OHEP that funding for MEAP and the Gas Arrearage Retirement

⁴Annual Report at pp. 16 and 19.

Assistance Program (GARA) had been exhausted, and that as a result, OHEP would deny all MEAP and GARA applications starting on April 17, 2024 until June 30, 2024. The funding exhaustion was due to an unprecedented increase in utility bill assistance applications received in FY 2024 coupled with higher energy costs and budgetary constraints (notably, the implementation of Categorical Eligibility which increased OHEP applications significantly). On May 28, 2024, the Commission requested comments regarding this matter and if the Commission should take any action addressing the issue acknowledging that customers will be unable to access MEAP and GARA assistance during this time period. On June 18, 2024, the Commission issued Order No. 91202 which directed utilities to add an additional 15 days to any termination notice given to customers that were denied assistance between April 17th and June 30th and noted various utilities' ability to halt disconnection practices for the affected customers until July 31, 2024. Funding for the MEAP and GARA programs resumed in July 2024 with the start of the new fiscal year, and applications for these programs resumed shortly thereafter.

Due to the adoption of categorical eligibility and the increased income guidelines from 175% of FPL to 200% FPL, OHEP expects an increased demand for energy assistance. However, the shape and magnitude of this demand will not be clear until the program changes have been in effect for at least one year. In the meantime, OHEP plans to carefully monitor the following: 1) application and demand trends in order to identify increases in the need for assistance, 2) economic factors impacting household income such as unemployment rates and enrollment in other income assistance programs, 3) increases in market-based electric rates, 4) trends in extreme temperature, and 5) the capacity of the local administering agencies (LAAs) to manage demand.

OHEP states that it has reserved \$125,000 for FY 2025 outreach activities conducted by its local administering agencies. Outreach efforts will be focused on assistance to medically fragile/vulnerable customers in completing applications and in increasing awareness of categorical eligibility. Waivers were granted to customers who enrolled due to categorical eligibility but whose incomes exceeded 200% FPL. These waivers equaled a \$25 benefit and OHEP proposes to retain this policy.

B. How Benefits Were Calculated for FY 2024 and Will Be Calculated for FY 2025

For bill assistance under the EUSP, OHEP has used 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 has divided participants into groups based on gross household income using the federal poverty levels (FPL) noted in PUA §7-512.1(a)(1). The EUSP groups for FY 2024 were 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; 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.

These five Poverty Level Groupings will continue in FY 2025 with changes as described below, with the addition of a sixth poverty level. Poverty Level 6 will include MEAP-subsidized sub-metered dwellings. The lower an EUSP participant's poverty level, the higher will be the benefit received by that participant. 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. Poverty Level 6 participants are SNAP recipients who also receive a relatively small benefit.

The electricity usage of each EUSP participant as certified by the participant's electric company is taken into account up to a set limit (12,000 kWh for FY 2025), with additional bill assistance provided by MEAP to participants who heat with electricity. A final adjustment is made for the relative cost of electricity for each EUSP participant—those 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.

In FY 2025, EUSP bill assistance grants will be categorized into more targeted groupings in order that the highest benefits are awarded to participants with the greatest annual energy burdens. The new poverty levels will be determined as before with the following delineations:

Level 1 will be set to include participants with 0 to 25% FPL

Level 2 will be set to include participants with 26 to 50% FPL

Level 3 will be set to include participants with 51 to 100% FPL

Level 4 will be set to include participants with 101 to 150% FPL

Level 5 will be set to include participants with 151 to 200% FPL

(the recently adopted EUSP limit)

Level 6 will be composed of the EUSP participants who were formerly in Level 5

Level 7 will be set to include categorically eligible households with incomes exceeding 200% FPL.

OHEP has historically used the federal poverty levels described above to assess a household's eligibility for arrearage assistance as well as bill payment assistance, however, it is not clear whether this policy will continue under the new categories and as future changes are made. Despite the exclusion of 2020 and 2021 from the five-year period required to qualify for arrearage assistance, almost 10 percent of applicants were denied assistance. Total arrearage assistance benefits in FY 2024 of \$31,088,657 were awarded; OHEP recommends \$30,000,000 for FY 2025.

C. OHEP Projections for Funds to be Expended in FY 2025

OHEP anticipates that its enrollment will continue to increase. However, as discussed above, OHEP maintains that it has sufficient funds for FY 2025. OHEP's Annual Report is attached as Appendix A.

IV. Findings and Recommendations

A. Total Amount of Funding Recommended for FY 2025

Under the projected funding structures and new eligibility criteria, the Commission recommends the FY 2025 EUSP funding levels outlined in Table 2 below. This recommendation is based on 2024 participation levels. Methods for calculating bill payment assistance and awarding arrearage retirement assistance are discussed in Section III B above.

Table 2: Projected Funds Available for FY 2025 from All Sources	
Funding Source	Amount
Ratepayer Statutory Collection	\$37,000,000 ⁵
Allocation from RGGI Auctions (SEIF/RGGI)	\$94,049,796
MEAP Funding for EUSP Participants	\$30,000,000 ⁶
Dominion Cove Point Settlement	\$400,000
Total	\$161,449,796

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. While the Commission notes that OHEP did not offer a specific projection regarding the size of its bill assistance benefit in FY 2025, 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 \$125,000. 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 yet unknown challenges. Therefore, the Commission agrees that close monitoring of these circumstances through the OHEP Advisory

⁵ This is the maximum that can be collected and allocated by law. PUA §7-512.1(e).

⁶ Total LIHEAP funding is expected to be \$74,044,552 in FY 2025 which is less than the \$82,939,890 allocated to Maryland in FY 2024 due to the conclusion of certain supplemental funding provided in the three previous fiscal years. Thirty million dollars will be allocated to cover arrearage retirement for EUSP participants.

Group and direct communication with the Commission and its Staff is necessary to respond to any unexpected needs.

B. Total Amount of Need for Bill Assistance (Electric Customers with Annual Incomes at or below 200% of the Federal Poverty Level and the Basis for this Determination)

Under PUA §7-512.1(a)(1), EUSP eligibility extends to 200 percent of the federal poverty level. OHEP states that households receiving EUSP bill payment assistance increased by 18.5%, and bill assistance benefit expenditures totaled \$71,642,510. OHEP projects that applications for 2025, which increased by 62.5% in FY 2024, will continue to increase due to categorical eligibility. As explained in this report, OHEP has lowered the maximum EUSP bill payment benefit in an effort to serve as many qualifying households as possible. OHEP has designed its revised bill payment plan to continue to weight payments towards those with the lowest household incomes.

The Commission notes that the number of actual participants in EUSP for the coming fiscal year is unknown, but can reasonably be expected to increase due to categorical eligibility as well as the income eligibility for traditional OHEP bill assistance rising from 175% FPL to 200% FPL. Money for EUSP participants who heat with electricity should be available through MEAP, although the funding of LIHEAP/MEAP can vary from year to year. Additionally, OHEP is funded by 50% of the auctions from SEIF/RGGI, a source that is usually generous, but is not readily predictable.

OHEP projects available FY 2025 funding is as follows: 1) ratepayer funding of \$37,510,205; 2) SEIF/RGGI funding of \$94,049,796; 3) \$30,000,000 MEAP funding⁷ (for arrearage assistance); and 4) \$400,000 in funds from the Dominion Cove Point Settlement. In light of the EUSP's statutory mandate and OHEP's increasing 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 \$30,000,000 of SEIF/RGGI funds be spent on arrearage assistance but approves the bulk of the spending go to bill assistance. EUSP will require at least the same amount of funding in FY 2025 as it expended in FY 2024. The Commission notes that the average benefit should continue to be weighted to those poverty levels where the need is the greatest.

C. Arrearage Retirement Assistance Funding

The Electric Customer Choice Act limits arrearage retirement assistance for EUSP participants to once every five years. In FY 2024, OHEP awarded \$30,189,000 of non-ratepayer funds for EUSP arrearage retirement. The average arrearage grant was \$1,029. OHEP intends to award \$30,000,000 in non-ratepayer funding in FY 2025. The Commission supports this plan but notes that due to the exceptionally cold winter experienced in 2024-2025, there may be an increased need for arrearage assistance in FY 2025.

⁷ This amount is allocated to cover arrearage retirement for EUSP participants. Additional MEAP funding will be spent for EUSP participants who heat with electricity. However, that amount is not known at this time.

It is the Commission's long-standing position that the EUSP should fund current bills over past arrearages. Due to funding provided by MEAP, OHEP 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 MEAP, the Commission, in the past, has supported OHEP's ongoing practice of offering no waivers to households above the EUSP statutory limit. However, due to categorical eligibility, OHEP must serve some customers with incomes above 200% FPL. OHEP has awarded these participants waivers accompanied by \$25 bill assistance grants. OHEP proposes to repeat this practice in FY 2025. The Commission does not oppose this practice for the coming year but will review it again next year when more data is available.

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.⁸ All Maryland electric utilities were directed to file revised tariffs which were 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 approximately \$6.8 million in funds in excess of the statutory limit had been collected during FY 2019.⁹ 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.

F. The Impact of Using Other Federal Poverty Program Benchmarks

OHEP uses the federal poverty level to determine eligibility for EUSP assistance. Categorical eligibility, which has recently been added, is also evaluated using FPLs. Under the EUSP legislation, eligibility is capped at 200% FPL. The FPLs are based on gross household income and family size and are updated periodically based on various cost of living indices. The

⁸ 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.

⁹ 2019 Annual Report at p. 18.

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.

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 affect the success and effectiveness of the EUSP. The Commission does not recommend changing the existing OHEP benchmarks.

G. Maryland Department of Legislative Services Evaluation of the Office of Home Energy Programs

On February 10, 2025, the Maryland Department of Legislative Services (DLS) released a report that evaluated the Office of Home Energy Programs. This evaluation was conducted in order to review OHEP's bill payment and arrearages payment programs and determine: 1) whether the establishment of categorical eligibility for energy assistance programs resulted in reduced energy burdens and prevented utility disconnections for low-income households in Maryland, 2) the impact of the MEAP funding exhaustion in April 2024 on low-income households, and 3) the sufficiency of current OHEP energy assistance programs for low-income households. The evaluation specifically reviewed EUSP, MEAP, GARA, and Electric Arrearage Retirement Assistance (EARA).

After conducting its review, DLS recommended: 1) The General Assembly should revisit analysis of the impact of House Bill 323 of 2023 (Categorical Eligibility) once there is a longer time frame of outcome data, 2) The General Assembly could consider merging energy assistance programs into one energy assistance program jointly funded by federal Low Income Home Energy Assistance Program (LIHEAP) and State special funds, 3) The Public Service Commission should review ratepayer statutory collection for the EUSP program, and 4) The General Assembly could consider requiring OHEP to prioritize funding for vulnerable groups. The Commission will consider changes in accordance with these recommendations in the future.

V. Conclusion

Based on the OHEP FY 2024 Annual Report and as shown in Table 2, the Commission recommends that the total amount of funds for the EUSP for FY 2025 be at least \$161,449,796. The Commission believes that this amount of funding is necessary to protect Maryland low-income electric customers in the near term. However, both OHEP and the Commission will monitor the FY 2025 program and note challenges related to key items such as bill increases, budget deficit management effects and federal mandates with submission of potential remedies.

VI. Appendix A



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

Electric Universal Service Program (EUSP)
Annual Report
State Fiscal Year 2024

Submitted to the
Maryland Public Service Commission

Introduction

The Deregulation Act of 1999, codified in Md. Code Ann., Public Utilities § 7-512.1, established the Electric Universal Service Program (EUSP) to assist electric customers with annual incomes at or below 175% of the federal poverty level. In 2021, the Maryland General Assembly amended § 7-512.1, expanding EUSP eligibility to households with at least one member aged 67 or older and increasing the income threshold to 200% of the federal poverty level.

Recent Updates:

- **Effective October 1, 2023**, EUSP income eligibility increased to 200% of the federal poverty level for all households.
- **January 1, 2024**, DHS implemented [House Bill 323 \(2023\)](#), which categorically qualifies households receiving benefits from programs such as Supplemental Nutrition Assistance Program (SNAP), Supplemental Security Income (SSI), Temporary Assistance for Needy Families (TANF), and Means-Tested Veterans Affairs Benefits for EUSP and MEAP benefits. Due to differences in program eligibility criteria, some categorically eligible households may have incomes exceeding 200% of the federal poverty level.

Program Administration: The Department of Human Services (DHS) Family Investment Administration (FIA) Office of Home Energy Programs (OHEP) administers EUSP and oversees 20 Local Administering Agencies (LAAs) across Maryland, where applications for assistance are received and processed.

EUSP includes **Arrearage Retirement Assistance**, funded by the Maryland

Strategic Energy Investment Fund (SEIF) and the Regional Greenhouse Gas

Initiative (RGGI). Together with the Federal Low Income Home Energy Assistance

Program (LIHEAP), operated as the Maryland Energy Assistance Program (MEAP), these programs help low-income Marylanders afford electricity and heating for their homes.

To simplify the application process for Marylanders, OHEP integrates these programs and utilizes a shared application for energy assistance.

Md. Code Ann., Public Utilities § 7-512.1(c), requires OHEP to file an Annual Report with the Public Service Commission. This report provides responses to the statutory questions and a SFY24 Program summary.

Statutory Questions

(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 the amounts expended from the universal service program during the proceeding fiscal year;***

OHEP Response:

In SFY24, applications for EUSP Bill Payment assistance increased by 62.5% from the previous year and households receiving benefits increased by 18.5% or 17,863 households. The SFY24 EUSP Bill payment benefit expenditures totaled \$ 71,642,510.66¹⁰.

OHEP Recommendation:

With the projected increase in the number of households applying for energy assistance benefits, OHEP has changed the maximum EUSP Bill Payment and MEAP benefits for State Fiscal Year 2025 to ensure that as many Marylanders as possible can be served. OHEP anticipates that the allocated funding for EUSP Bill Payment assistance, at the new benefit levels, will be sufficient for SFY25.

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

OHEP Response:

In SFY24 the formula for calculating the EUSP benefit amount was:

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

The formula considered a household's total income and its electric usage, ensuring that households with the lowest incomes and highest energy needs received the greatest benefits.

Benefit levels were structured according to the household's poverty level and housing status:

Level 1	0–75%	Federal Poverty Level
Level 2	76-110%	Federal Poverty Level
Level 3	111-150%	Federal Poverty Level
Level 4	151-200%	Federal Poverty Level

¹⁰ Total SFY24 EUSP Bill Payment expenditures are adjusted to account for refunds received during the program year. Attachment B, which details SFY24 EUSP Bill Payment expenditures by jurisdiction, reflects benefits processed but excludes refunds.

Level 5	Subsidized Housing Benefit: Households in subsidized housing receive the lowest benefit level, as their housing subsidy is assumed to offset some energy costs.
Level 6	MEAP Subsidized Sub-Metered

Electric usage data was obtained from the customer's utility provider when they applied for assistance. This data, combined with the cost of electricity per kilowatt-hour, was used to estimate the household's annual electricity cost.

To account for variations in electricity costs across different utility providers, the benefit calculation was adjusted based on the applicant's specific electric supplier.

The final benefit amount was determined by:

1. The household's annual electric usage and estimated cost.
2. The household's poverty level or subsidized housing status, if applicable.

OHEP Recommendation:

OHEP has recommended minor adjustments to the benefit methodology in its SFY25 EUSP Operations Plan to enhance the program's capacity to project and manage benefit expenditures as more households apply for energy assistance benefits.

Annual kWh usage by range x Average Annual Cost x poverty level percentage relative to household size = EUSP Benefit

The distribution of grants continues to be based on income, relative to household size as well as electric usage to determine the level of the benefit. The annual KWh usage will continue to be obtained from each electric provider for the applicant's previous 12-month usage. The kWh usage will then be categorized into the following ranges to calculate a flat rate benefit.

0-4,000 kWh	
	4,001 to 8,000 kWh
	8,001 to 12,000 kWh
	12,000 kWh or greater

If a household's kWh usage exceeds 12,000, then 12,001 is used when calculating the benefit. This is considered a reasonable benchmark for usage for customers who do not heat with electricity, as the average Maryland household usage is 11,676 kWh according to the U.S. Energy Information Administration.

SFY25 grants will vary according to income levels designated in poverty level groupings consisting of:

Level 1	0-25% Federal Poverty Level
Level 2	26-50% Federal Poverty Level
Level 3	51-100% Federal Poverty Level
Level 4	101-150% Federal Poverty Level
Level 5	151-200% Federal Poverty Level
Level 6	Subsidized Housing Recipients
Level 7	Categorically Eligible Households that exceed 200% FPL

Electric benefits will continue to be weighted so that customers with the greatest annual energy burden receive the highest benefits.

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

OHEP Response:

The Office of Home Energy Programs (OHEP) will carefully monitor several factors that could necessitate a reassessment of Electric Universal Service Program (EUSP) funding levels:

1. Application and Enrollment Trends

Fluctuations in the number of applications and enrolled households will be analyzed to identify increases in demand for assistance.

2. Economic Factors Impacting Household Income

Changes in the economic landscape, such as unemployment rates, increases in Supplemental Nutrition Assistance and Cash programs, and reductions in household income, may affect the number of households qualifying for energy assistance.

3. Adjustments to Market-Based Electric Rates

Any significant changes in electric rates driven by market conditions could increase household energy costs, influencing funding requirements.

4. Demand Due to Extreme Temperatures

Periods of extreme weather—colder-than-average winters or hotter-than-average summers that can drive higher energy usage, increasing the need for assistance among vulnerable households.

5. Capacity of Local Administering Agencies (LAAs)

The ability of LAAs to manage growing application volumes will be closely assessed to ensure they can meet the demand without increasing their average processing times.

OHEP Recommendation:

OHEP anticipates a growing demand for bill assistance and arrearage benefit funding in the coming years as more Marylanders qualify for benefits with the increased income guidelines and Categorical Eligibility. A clearer understanding of this increased need will emerge once the program has completed a full year of data collection. Additional factors influencing future funding requirements include the implementation of the Clean Energy Connector pilot and the adoption of limited-income mechanisms aimed at lowering utility costs for low-income households.

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;

OHEP Response:

	Total Collection	Statutory Limit	Excess Collection
FY2024	\$36,865,908	\$37,000,000	(\$134,092)

OHEP Recommendation:

The rate of collection will need to be monitored and evaluated to ensure sufficient funding is generated in future years to accommodate the growing number of applicants.

(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.

OHEP Response:

The target population in Maryland, consisting of households at or below 175% of the federal poverty level, is estimated to be approximately 380,944. OHEP provided EUSP bill assistance to 106,832 households at or below the 175% of federal poverty in SFY24 or 28% of the eligible households in Maryland. These estimates are based on data from the U.S. Census Bureau's American Community Survey (2017–2022).

OHEP Recommendation:

OHEP will continue to monitor application trends and inform the Commission of any concerns regarding the availability of resources to meet the need.

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

OHEP Response:

Demand for the Electric Arrearage Retirement Assistance (EARA) Program increased in SFY 2024, with 164,524 households applying or being screened for electric arrearage assistance—a 140.16% increase compared to SFY 2023. Despite the exclusion of arrearage assistance received in calendar years 2020 and 2021 from the five-year rule, 13,395 or 9.97% of the households were denied assistance due to this rule. Total EARA benefit expenditures for SFY 2024 amounted to \$31,088,657.24¹¹.

OHEP Recommendation:

OHEP recommended in its SFY25 EUSP Operations Plan that \$30,000,000 in MSEIF (RGGI) funding be allocated to support EUSP Arrearage Retirement Assistance program in SFY25.

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

OHEP Response:

OHEP is authorized under the Public Utilities Article §7-512.1(a) (6) to approve a waiver to the income eligibility guideline for electric customers using the same guidelines used for MEAP.

¹¹ Total SFY24 EARA expenditures are adjusted to account for refunds received during the program year. Attachment B-1, which details SFY24 EARA expenditures by jurisdiction, reflects benefits processed but excludes refunds.

Due to differing eligibility requirements between Supplemental Nutrition

Assistance, Temporary Assistance for Needy Families, Supplemental Security Income, Means Tested Veterans benefits, and energy assistance programs, some households now categorically eligible to receive EUSP and MEAP benefits may exceed the 200% FPL income threshold. Categorically eligible households exceeding 200% FPL will receive a nominal bill payment benefit of \$25.00. This approach prioritizes the greatest benefits for those with the lowest income and highest energy burden.

OHEP Recommendation:

OHEP recommends maintaining the current policy. The funding requirements for bill assistance and arrearage retirement for customers exceeding the income limitations will be assessed after a full year of data has been collected.

(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;

OHEP Response:

The ratepayer funds collected for EUSP, combined with SEIF/RGGI funding and supplemented by LIHEAP assistance, were sufficient to meet the annual demand for electric bill payment assistance in SFY2024.

OHEP Recommendation:

With the income eligibility threshold increasing from 175% to 200% of the Federal Poverty Level (FPL) and the implementation of Categorical Eligibility, OHEP will closely monitor the number of applicants qualifying for electric bill assistance to assess and address future funding requirements.

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;

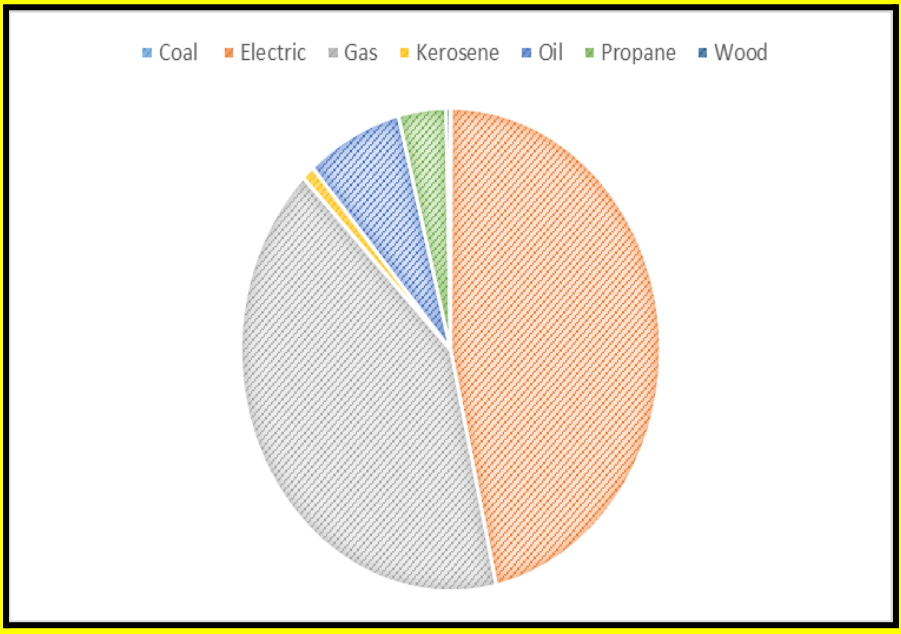
OHEP Response:

The Maryland Energy Assistance Program (MEAP) is funded through the federal

Low-Income Home Energy Assistance Program (LIHEAP) Block Grant. In Fiscal Year 2024, 94,250 households received assistance through MEAP, with total benefit expenditures amounting to \$68.0 million. An additional 251,238 households received a SNAP Heat & Eat benefit of \$21.00 funded by LIHEAP. Heat and Eat expenditures of SFY24 total \$5,275,998

and 629 households received emergency furnace repair or replacement assistance funded by LIHEAP at a cost of \$6 million dollars in SFY24. The table and chart below illustrate the number of MEAP benefit recipients by fuel type:

Coal	38
Electric	43,784
Gas	38,715
Kerosene	908
Oil	6,990
Propane	3,454
Wood	316



OHEP Recommendation:

Not Applicable

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

OHEP Response:

The OHEP State office partners with Local Administering Agencies (LAAs) and various organizations to implement a broad array of outreach activities. In State Fiscal Year 2024, OHEP allocated \$200,000 to LAAs to support supplemental outreach initiatives.

OHEP Recommendation:

Outreach has been and remains a critical component of the OHEP program, but recent changes have made it easier for many Maryland families to receive help with their energy bills. Maryland General Assembly [House Bill 323 \(2023\)](#) now provides categorical eligibility for energy assistance to households that receive benefits from the Supplemental Nutrition Assistance Program (SNAP), Supplemental Security Income (SSI), Temporary Assistance for Needy Families (TANF), and/or Means-Tested Veterans Affairs Benefits, and have a utility account.

Categorically eligible households no longer need to apply separately for the

Maryland Energy Assistance Program (MEAP), Electric Universal Service Program (EUSP), Electric Arrearage Retirement Assistance (EARA), or Gas Arrearage Retirement Assistance (GARA). They are automatically considered for energy assistance, which impacts how OHEP manages its outreach efforts.

In SFY 2025, outreach efforts have shifted towards providing hands-on assistance to medically fragile/vulnerable customers in completing applications and increasing awareness of categorical eligibility as a means to reduce barriers for customers. OHEP requested \$125,000 to support these outreach efforts in SFY 2025.

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

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

OHEP Response:

Maryland Strategic Energy Investment Fund- In State Fiscal Year 2024, OHEP received \$99,079,134 in funding from the Strategic Energy Investment Fund (SEIF). This amount will decrease to \$94,049,796 in State Fiscal Year 2025.

*Low-Income Home Energy Program/Maryland Energy Assistance Program-*In Federal Fiscal Year 2024, Maryland received a total LIHEAP allocation of

\$82,939,890. Maryland has received \$74,044,552 in FY25 LIHEAP funding to date, which represents 89% of the FY24 allocation. The notable reduction in available LIHEAP funding in

FY24 and FY25 reflects the conclusion of supplemental funding that was provided during Federal Fiscal Years 2021, 2022, and 2023.

Other Federal, State, Local or Private Source- Since 2019, OHEP has received an annual allocation of \$400,000 from the Dominion Cove Point settlement. These funds will continue to be distributed annually for a total of twenty years, through 2039.

(ii) The Office of Home Energy Programs may satisfy the reporting requirements of subparagraph (i) 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 federal government.

OHEP Response:

Attachment A is the LIHEAP Households Report for FY2024, which will be submitted to the federal government. It is important to note that the majority of the households counted under LIHEAP also received benefits through the Electric Universal Service Program (EUSP).

State Fiscal Year 2024 Program Summary

Highlights

In Fiscal Year 2024, OHEP received a total of 243,252 applications from customers seeking heating and electric assistance through OHEP-administered programs.

- ***EUSP Bill Payment Assistance:***
A total of \$71.6 million in Bill Payment Assistance benefits was issued to 114,230 households. The average Bill Payment Assistance benefit for FY 2024 was \$628.00.
- ***Electric Arrearage Retirement Assistance:***
\$31.08 million in Electric Arrearage Retirement Assistance benefits was issued to 30,189 households, with the average Arrearage Retirement Assistance benefit being \$1,030.
- ***Categorical Eligibility:***
OHEP implemented Categorical Eligibility on January 1, 2024.

Administrative Operations

Twenty Local Administering Agencies (LAAs) across Maryland are responsible for receiving and processing applications for the Electric Universal Service Program (EUSP). Applications are received through various channels, including mail, email, fax, drop-offs, in-person interviews, outreach events, and the MDTHINK Consumer portal.

LAAs perform all necessary functions to provide EUSP benefits, which include:

- Conduct outreach to raise awareness of the program
- Review, verify, and process applications
- Assist applicants in completing applications in person or over the phone as needed
- Respond to crisis situations (e.g., termination notices or off-service) by initiating contact with utility companies to prevent or restore service
- Determine eligibility for OHEP and screen applicants for all available OHEP benefits
- Certify applications and benefit amounts
- Refer applicants for additional assistance as necessary The state OHEP office carries

out the following functions:

- Program planning, budgeting, and policy development
- Provide support for the LAAs
- Train LAAs and community partners
- Manage procurement and contracts
- Conduct LAA monitoring and quality control
- Generate weekly Energy Delivery Statements (EDS) for payment processing
- Process utility and bulk fuel payments
- Develop and implement technology system enhancements • Conduct outreach

The state OHEP office processes payments to utilities for applications approved by LAAs. OHEP generates Energy Delivery Statements and payment transmittal documents that request payment from the DHS Fiscal Office (Accounts Payable). These requests are then entered into the State's Financial Management Information System (FMIS), and the Office of the Comptroller processes payment issuance, either by check or electronic transfer.

Payment Processing and Data Transfer

The state OHEP office processes payment requests weekly starting in July. For major utilities, benefit data is transferred electronically via Secure File Transfer Protocol (SFTP). DHS and its contractor use SFTP as a secure method to transfer confidential data, providing each utility with a username and password to access data on a weekly basis.

Communication and Coordination

Regular communication among OHEP, LAAs, utilities, and stakeholders is vital for ensuring the timely and accurate dissemination of policy updates and addressing operational issues. Communication is carried out through:

- Weekly meetings with the LAAs to update them on new developments and identify policy and operational concerns
- Written policies and procedures

- Weekly monitoring reports
- OHEP Data System screen messages announcing system updates and alerts
- Meetings and trainings, allowing LAAs to share best practices and receive program updates
- Attendance at BGE quarterly partnership meetings with OHEP, LAAs, The Fuel Funds, and other stakeholders
- Participation by OHEP and LAAs in annual meetings with utilities
- Quarterly OHEP Advisory Board Meetings with stakeholders

Administrative Expenditures

Fiscal Year	EUSP Administrative Expenditures
2024	\$9,276,468
2023	\$4,459,819
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

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

OHEP Data Management System

All applications for the Office of Home Energy Programs (OHEP) are processed through the centralized OHEP Data Management System, a statewide database that integrates all necessary functions for application processing. The Department of Human Services (DHS) maintains a hosting contract to ensure continuous access and functionality. Additionally, software maintenance and system enhancement ensures that the system is regularly updated to meet new policy and program requirements.

Access to the OHEP Data System is secure, available either through the DHS network or via the DHS Virtual Private Network (VPN), allowing off-site application intake.

OHEP also offers a web portal for the general public, enabling applicants to check the status of their applications online at <https://myohepstatus.org/>. This functionality improves transparency and convenience for Maryland families seeking energy assistance.

myMDTHINK

myMDTHINK is the Department of Human Services' (DHS) online application system, accessible at <https://mymdthink.maryland.gov/>. It 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)
- Medicaid
- Emergency Assistance for Families with Children (EAFC)

Energy assistance applications submitted through the myMDTHINK Consumer

Portal are automatically imported into the OHEP Data System daily by staff. In State Fiscal Year 2024, OHEP received a total of 129,273 applications through the portal, representing a significant increase from the 36,370 applications received in SFY23. However, this total includes Categorical Eligibility applications, as the system in SFY24 did not differentiate between Consumer Portal and Categorical Eligible applications. System enhancements completed in SFY25 will allow OHEP to report on the two types of applications.

Customer Service

The vast majority of customer calls and inquiries in State Fiscal Year 2024 were received directly by OHEP's Local Administering Agencies (LAAs). In August 2024, the Department of Human Services (DHS) implemented a new central Call

Center as the primary point of entry for customers inquiring about benefits. The Call Center staff can assist OHEP customers with application inquiries, answer questions, and provide updates on application status information similar to what is available on MyOHEPStatus.org.

Customer service representatives have been trained and will have access to the OHEP database to relay information to customers and connect them to their local office when needed. The Call Center continues to improve customer service, provide the State and local OHEP offices with better oversight and tracking of responses, and is designed to allow local agencies to focus more time on processing applications.

Bill Payment Assistance

In SFY24 a total of \$71.6¹² million in Bill Payment Assistance benefits were issued to 114,230 households. The average Bill Payment Assistance benefit for FY 2024 was \$628.00. The table below provides this data for SFY2008 through SFY2024 to show trends over time in the number of households served.

Program and Year	Households Served	Average Grant	Ratepayer Funds (millions)	Other Funds (millions)	Total Benefit Expenditure (millions)
EUSP Bill Assistance					
2024	114,230	\$628	\$20.8	\$50.8	\$71.6
2023	96,367	\$939	\$30.7	\$59.7	\$90.4
2022	79,951	\$763	\$27.5	\$33.4	\$60.9
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

Source: Maryland Department of Human Services, Family Investment Administration, Office of Home Energy Programs **Note 1:** The benefit expenditures for SFY2024 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 Management System. The data may not be final and are for information purposes only. **Note 2:**Benefit expenditures for the years prior to SFY2014 include supplemental benefit payments. Average benefit calculation does not include the supplemental amount.

The following table provides the number of households receiving EUSP bill assistance benefits by poverty level and Percentage of EUSP Distribution by Poverty Level from SFY 2009 to SFY2024.

The data consistently shows that the largest percentage of Electric Universal Service Program (EUSP) benefits are allocated to households with the lowest incomes. This reflects the

¹² Total SFY24 EUSP Bill Payment expenditures are adjusted to account for refunds received during the program year. Attachment B, which details SFY24 EUSP Bill Payment expenditures by jurisdiction, reflects benefits processed but excludes refunds.

program's focus on assisting households that are most in need of financial support for their electric bills.

Number of EUSP Household Recipients by Poverty Level						
% of Federal Poverty Level Recipients	0-75%	75 -110%	110 -150%	150 -175%	150-200%	Total
	Level 1	Level 2	Level 3	Level 4	Level 4*	
2024	37,938	31,710	26,283		18,299	114,230
2023	23,740	17,372	19,681	11,037		96,370
2022	29,936	21,773	19,358	8,022		79,953
2021	31,832	22,766	20,682	8,360		83,702
2020	28,797	24,808	22,206	8,268		84,079
2019	33,163	26,664	23,771	9,925		93,523
2018	34,991	26,175	23,784	9,705		94,655
2017	35,540	26,755	24,142	9,997		96,434
2016	40,498	27,156	25,114	10,179		102,947
2015	42,138	29,652	26,481	10,824		109,095
2014	44,398	32,028	28,149	11,089		115,664
2013	42,664	30,688	27,237	10,699		111,288
2012	46,102	32,888	29,586	12,163		120,739
2011	50,751	34,667	32,514	14,105		132,037
2010	48,242	34,091	32,678	14,480		129,671
2009	42,328	31,898	28,878	13,038		116,142

Percentage of EUSP Distribution by Poverty Level						
% of Federal Poverty Level Recipients	0-75%	75 -110%	110 -150%	150 -175%	150-200%	Total
	Level 1	Level 2	Level 3	Level 4	Level 4*	
2024	33.2%	27.75%	23.0%		16.0%	100.0%
2023	24.6%	18.0%	20.4%	11.5%		100.0%
2022	37.4%	27.2%	24.2%	10.0%		100.0%
2021	38.0%	27.2%	24.7%	9.9%		100.0%
2020	34.2%	29.6%	26.4%	9.8%		100.0%
2019	35.5%	28.5%	25.4%	10.6%		100.0%
Percentage of EUSP Distribution by Poverty Level						
2018	37.0%	27.6%	25.1%	10.3%		100.0%
2017	36.9%	27.7%	25.0%	10.4%		100.0%
2016	39.3%	26.4%	24.4%	9.9%		100.0%
2015	38.6%	27.2%	24.3%	9.9%		100.0%

2014	38.4%	27.7%	24.3%	9.6%		100.0%
2013	38.4%	27.5%	24.4%	9.7%		100.0%
2012	38.2%	27.2%	24.5%	10.1%		100.0%
2011	38.4%	26.3%	24.6%	10.7%		100.0%
2010	37.3%	26.3%	25.2%	11.2%		100.0%
2009	36.4%	27.5%	24.9%	10.2%		100.0%

Source: Maryland Department of Human Services, Family Investment Administration, Office of Home Energy Programs * SFY 2024 EUSP income eligibility increased to 200% FPL.

Note 1: Attachment B provides SFY2024 application and recipient data by jurisdiction.

Arrearages

In recent years, OHEP has used SEIF funding, rather than EUSP Ratepayer funds, to provide Electric Arrearage Retirement Assistance (EARA).

Historically, households could only receive arrearage benefits once in a lifetime.

However, in FY 2010, this restriction was amended under Md. Code Ann., Public

Utilities § 7-512.1(a)(2) to allow additional benefits after seven years. To qualify for Electric Arrearage Retirement Assistance, households must have a past-due electric balance of at least \$300. The maximum benefit within a seven-year period is \$2,000. For needs exceeding this cap, applicants are referred to community-based programs for additional assistance.

In FY 2014, OHEP implemented a waiver policy for "vulnerable households," defined as those with a member aged 65 or older, under 2 years old, or medically fragile. Households that received \$800 or less in Electric Arrearage Retirement Assistance over the previous seven years could apply for additional funds, up to the \$2,000 maximum benefit.

In FY 2019, OHEP launched the Gas Arrearage Retirement Program using MEAP funds to address natural gas arrears. This program mirrors the electric arrearage program, with eligibility requiring arrears between \$300 and \$2,000 and a seven-year limit, except for eligible waivers.

During the 2021 legislative session, Md. Code, Public Utilities § 7-512.1 reduced the arrearage benefit cap from seven years to five, allowing households to access arrearage benefits sooner. The legislation also exempted arrearage assistance received during the 2020 and 2021 calendar years from counting toward a household's eligibility for arrearage funds.

Arrearage benefits address only the past-due balances covered under specific

electric and gas arrearage programs. In certain cases, EUSP Bill Payment and MEAP funds may also be applied to arrears, but the total benefits applied to past-due amounts is not known.

The total Electric Arrearage Retirement Assistance (EARA) benefits distributed in SFY24 are provided in the Household Served Report below. This report offers a detailed breakdown of the number of households assisted and the benefit levels distributed

Program and Year	Households Served	Average Grant	Ratepayer Funds (millions)	Other Funds (millions)	Total Benefit Expenditure (millions)
<i>EARA Arrearage</i>					
2024	30,189	\$1029	-	\$31.0	\$31.0
2023	29,376	\$1,123	-	\$32.9	\$32.9
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

In FY2024, OHEP granted a total of 395 Vulnerable Population Waivers, totaling \$334,390.35 in EARA benefits. The following chart breaks down the Vulnerable Population Waivers approved by jurisdiction in State Fiscal Year 2024 (SFY24).

ALLEGANY COUNTY	16	\$14,166.83
ANNE ARUNDEL	19	\$16,925.21
BALTIMORE CITY	58	\$47,997.38
BALTIMORE COUNTY	26	\$21,710.67
CECIL	6	\$5,598.79

FREDERICK	22	\$13,753.86
DORCHESTER	54	\$43,612.25
HARFORD	24	\$19,692.58
MONTGOMERY	12	\$9,301.71
PRINCE GEORGE'S	92	\$88,771.43
QUEEN ANNE'S	13	\$9,572.47
SOUTHERN MD	50	\$39,737.55
WASHINGTON	3	\$3,549.62
Total	395	\$334,390.35

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

In SFY24, OHEP's Local Administering Agencies denied a total of 134,345 applications for EARA. Of these, 13,395 or 9.96% of the EARA applications were denied specifically due to the 5-year rule. The table below provides a jurisdictional breakdown of the 5-year rule denials.

Agency Name	Total Denied EARA Applications for 5-year Rule
ALLEGANY COUNTY DEPT OF SOCIAL SERVICES.	651
ANNE ARUNDEL COUNTY COMMUNITY ACTION AGENCY INC	574
BALTIMORE CITY MOHS	5279
BALTIMORE COUNTY DEPT OF SOCIAL SERVICES	3442
CAROLINE COUNTY DEPT OF SOCIAL SERVICES	250
CECIL COUNTY DEPT OF SOCIAL SERVICES	30
COMMUNITY ACTION COUNCIL OF HOWARD COUNTY, MD, INC.	73
DORCHESTER COUNTY DEPT OF SOCIAL SERVICES	85
FREDERICK COMMUNITY ACTION AGENCY	128

GARRETT COUNTY COMMUNITY ACTION COMMITTEE, INC.	29
HARFORD COMMUNITY ACTION AGENCY, INC.	33
HUMAN SERVICE PROGRAMS OF CARROLL COUNTY INC	0
KENT COUNTY DEPT OF SOCIAL SERVICES	135
MONTGOMERY COUNTY DEPT OF HEALTH AND HUMAN SERVICES	1651
NEIGHBORHOOD SERVICE CENTER, INC.	36
PRINCE GEORGE'S COUNTY DEPT OF SOCIAL SERVICES	310
QUEEN ANNES CO DEPT OF SOCIAL SERVICES	131
SHORE UP! INC	13
SOUTHERN MARYLAND TRI-COUNTY COMMUNITY ACTION COMMITTEE INC	146
WASHINGTON COUNTY CAC	399
Total :	13,395

Attachments

Attachment A	LIHEAP Household Report
Attachment B	Annual Intake and Approved Applications by County
Attachment C	Distribution of EUSP Grants by kWh Usage
Attachment D	SFY24 EUSP Monthly Income Eligibility Guidelines
Attachment E	SFY24 Living Arrangements by Poverty Level
Attachment F	SFY24 Legislative Report as of 06/30/2024
Attachment G	SFY24 Legislative Report as of 09/30/2024
Attachment H	SFY24 Distribution of Household Income for EUSP Recipients
Attachment I	SFY24 Service Status of Recipients at Time of Application

Attachment A

LIHEAP/ MEAP Assisted Households

<u>Assistance Type</u>	<u>Total Assisted Households</u>	<u>Under 12% Poverty</u>	<u>12%-24% Poverty</u>	<u>24%-36% Poverty</u>	<u>36%-48% Poverty</u>	<u>48%-60% Poverty</u>
Heating	94,205	22,616	32,404	24,710	11,500	2,975
Crisis*	4,400	1,053	1,242	1,037	718	350
Total:	94,205					

At Least One Member of the Household

<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>
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37,837	28,998	16,878	8,817	11,060	64816
1,073*	853	964	498	630	2388
38,910	29,851	17,842	9,315	11,690	67204

Total Household Members Served by Poverty Level (60% State Median Income)

<u>Assistance Type</u>	<u>Application Total</u>	<u>Under 12% Poverty</u>	<u>12%-24% Poverty</u>	<u>24%-36% Poverty</u>	<u>36%-48% Poverty</u>	<u>48%-60% Poverty</u>	<u>No Income**</u>
Heating	208,509	59,238	61,962	52,637	27,682	6,990	411
Crisis*	11,201	2,847	2,970	2,683	1912	789	21

*Crisis numbers are a subset of total households assisted.

Run Date 12/30/2024

** No Income households totals are also included in the Under 12% Poverty

Attachment B

EUSP Bill Payment Applications Approved by Jurisdiction 07/01/23-09/30/2024

County	Total Applications Received	Total Benefit Remitted	AverageBenefit
ALLEGANY	4767	\$2,596,874.70	\$1,465.31
ANNE ARUNDEL	4558	\$3,106,352.00	\$1,602.48
BALTIMORE	15959	\$10,125,800.00	\$1,444.98
BALTIMORE CITY	25037	\$14,484,526.00	\$1,626.44
CALVERT	861	\$750,454.00	\$1,750.35
CAROLINE	1361	\$979,771.00	\$1,617.82
CARROLL	2332	\$1,437,145.00	\$1,275.12
CECIL	3711	\$2,642,115.00	\$1,693.62
CHARLES	2075	\$1,732,127.00	\$1,722.59

DORCHESTER	2501	\$1,715,548.00	\$1,528.01
FREDERICK	3733	\$1,928,790.00	\$1,083.74
GARRETT	2074	\$1,165,308.00	\$1,601.59
HARFORD	4829	\$3,242,923.00	\$1,567.84
HOWARD	3544	\$2,212,200.00	\$1,264.98
KENT	872	\$575,160.00	\$1,556.89
MONTGOMERY	10235	\$5,321,883.00	\$1,285.87
PRINCE GEORGES	9843	\$6,433,031.00	\$1,791.61
QUEEN ANNES	1010	\$712,849.00	\$1,553.52
SOMERSET	1470	\$1,191,251.00	\$1,841.15
ST MARYS	1884	\$1,594,681.00	\$1,771.01
TALBOT	997	\$726,462.00	\$1,474.65
WASHINGTON	4139	\$2,135,075.00	\$1,173.29
WICOMICO	4743	\$3,621,357.00	\$1,730.73
WORCESTER	1695	\$1,289,952.00	\$1,605.40
TOTAL	114,230	\$71,721,634.70	\$627.87

Run Date 12/30/2024

Attachment B-1

EUSP Arrearage Applications Approved by Jurisdiction 07/01/23-09/30/2024

County	Total Approved Applications	Total Benefit Remitted	AverageBenefit
ALLEGANY	601	\$543,676.44	\$2,446.60
ANNE ARUNDEL	1655	\$1,828,036.43	\$2,330.89
BALTIMORE	4698	\$4,465,662.56	\$2,350.84
BALTIMORE CITY	8034	\$7,126,489.79	\$2,404.63
CALVERT	189	\$205,177.59	\$2,679.60

CAROLINE	260	\$243,598.14	\$2,474.87
CARROLL	260	\$313,824.30	\$2,638.45
CECIL	1049	\$1,237,644.16	\$2,515.03
CHARLES	528	\$528,107.17	\$2,568.95
DORCHESTER	559	\$559,104.87	\$2,366.29
FREDERICK	441	\$345,555.05	\$1,919.26
GARRETT	112	\$92,683.49	\$2,503.63
HARFORD	1117	\$1,206,036.83	\$2,606.38
HOWARD	838	\$847,688.43	\$2,207.37
KENT	139	\$135,990.41	\$2,512.55
MONTGOMERY	2939	\$3,491,459.59	\$2,347.34
PRINCE GEORGES	3703	\$4,483,155.88	\$2,602.82
QUEEN ANNES	191	\$182,212.89	\$2,419.84
SOMERSET	290	\$379,518.35	\$2,813.75
ST MARYS	403	\$389,705.97	\$2,565.86
TALBOT	78	\$66,519.65	\$2,502.76
WASHINGTON	468	\$354,032.00	\$1,978.60
WICOMICO	1341	\$1,731,383.94	\$2,633.90
WORCESTER	296	\$332,348.89	\$2,540.91
TOTAL	30,189	\$31,089,612.82	\$1,029.83

Run Date 12/30/2024

Attachment B-2

MEAP Applications Approved by Jurisdiction 07/01/2024- 09/30/2024

County	Total Approved Applications	Total Benefit Remitted	AverageBenefit
ALLEGANY	4054	\$3,824,402.99	\$1,650.11

ANNE ARUNDEL	3355	\$2,256,887.06	\$1,754.00
BALTIMORE	11920	\$7,724,593.08	\$1,648.98
BALTIMORE CITY	21749	\$16,612,798.16	\$1,764.99
CALVERT	726	\$574,803.63	\$1,835.18
CAROLINE	1298	\$1,030,904.82	\$1,631.76
CARROLL	2010	\$1,289,785.85	\$1,363.23
CECIL	3296	\$2,502,827.91	\$1,757.39
CHARLES	1765	\$1,378,669.78	\$1,810.96
DORCHESTER	2279	\$1,633,913.33	\$1,600.51
FREDERICK	3159	\$1,805,335.77	\$1,166.56
GARRETT	2121	\$2,234,504.06	\$1,622.45
HARFORD	4364	\$3,449,278.24	\$1,670.95
HOWARD	2566	\$1,382,337.06	\$1,409.45
KENT	850	\$687,406.36	\$1,564.54
MONTGOMERY	7370	\$3,662,736.88	\$1,433.55
PRINCE GEORGES	7289	\$5,566,959.12	\$2,044.23
QUEEN ANNES	917	\$718,691.60	\$1,589.53
SOMERSET	1420	\$1,189,677.12	\$1,838.38
ST MARYS	1633	\$1,420,904.16	\$1,864.10
TALBOT	989	\$688,160.98	\$1,472.71
WASHINGTON	3291	\$2,361,555.45	\$1,336.09
WICOMICO	4183	\$2,963,667.46	\$1,788.59
WORCESTER	1601	\$1,126,442.97	\$1,625.53
TOTAL	94,205	\$68,087,243.84	\$722.76

Run Date 12/30/2024

Note for B, B-1, and B-2: These charts provide approved benefit dollars. Actual funding distributed could vary due to refunds after benefit issuance.

Attachment C

Distribution of EUSP Grants by KWH Usage Within Benefit Levels

Program: BILL PAYMENT

County: ALL

Vendor: ALL

Year: 2024

KWH Range	Level 1	Level 2	Level 3	Level 4	Level 5	Level 6	Total
0 - 6000	6,100	5,724	5,381	3,633	10,776	272	31,886
6001 - 7000	1,785	1,518	1,645	1,145	2,581	19	8,693
7001 - 8000	1,935	1,533	1,631	1,187	2,272	16	8,574
8001 - 9000	1,790	1,436	1,528	1,065	2,017	8	7,844
9001 - 10000	1,666	1,280	1,318	1,042	1,813	5	7,124
10001 - 11000	1,535	1,202	1,196	906	1,464	9	6,312
11001 - 12000	1,439	1,034	1,075	909	1,192	5	5,654
12001 - 13000	1,306	968	987	762	1,100	2	5,125
13001 - 14000	1,232	902	959	710	961	6	4,770
14001 - Above	7,953	5,361	5,672	4,616	4,637	9	28,248
Total	26,741	20,958	21,392	15,975	28,813	351	114,230

Run Date: 12/2/2024 1:05:50 PM

Attachment D

SFY 2024
Income Eligibility Guidelines for EUSP

HOUSEHOLD SIZE	EUSP Maximum Monthly Gross Income (based on 200% of the Federal Poverty Level)
1	\$ 2,430
2	\$ 3,287
3	\$ 4,143
4	\$ 5,000
5	\$ 5,857
6	\$ 6,713
7	\$ 7,570
8	\$ 8,427
FOR EACH ADDITIONAL PERSON, ADD	\$ 857

Attachment E

Living Arrangements by Poverty Level

Program: BILL PAYMENT

Agency: ALL

County: ALL

Year: 2024

<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>Poverty Level 6</u>	<u>Total</u>
HOMEOWNER	7,689	8,259	9,471	6,317	0	0	31,736
PUBLIC / SUBSIDIZED	11,041	10,613	4,829	2,304	0	0	28,787
RENTER	18,787	12,513	11,784	9,550	0	0	52,634
ROOMER/BOARDER	41	51	23	8	0	0	123

SUBMETERED	101	61	62	55	0	0	279
SUBSIDIZED SUBMETERED	153	144	62	25	0	0	384
UNKNOWN	125	69	51	42	0	0	287
County Totals for: ALL	37,938	31,710	26,283	18,299	0	0	114,230

Run Date: 12/5/2024 1:53:25 PM

Appendix F

Year	FY 2023	FY 2024	CHANGE	% CHANGE
	7/1/22-6/30/23	7/1/23-6/30/24	2023- 2024	2023- 2024
Applications YTD*				
Total	143,102	243,252	100,150	70.0%
MEAP	137,598	231,660	94,062	68.3%
EUSP Bill Payment	136,732	238,488	101,756	74.4%
EUSP Arrearage Retirement	68,921	164,524	96,603	140.16%
Gas Arrearage Retirement	28,096	119,402	91,306	321.4%
Receiving Benefits YTD**				

MEAP	91,139	94,195	3,056	3.35%
EUSP Bill Payment	90,719	110,146	19,427	21.41%
EUSP Arrearage Retirement	28,207	29,014	807	2.86%
Gas Arrearage Retirement	10,788	8,675	-2,113	-19.58%

(Run date 7/5/2024)

***Receiving Benefits YTD reflect the total number of households who had benefits paid and/or certified as of June 30, 2024. FY24 benefits for EUSP and EUSP Arrearage Retirement continue to be processed and these numbers will not be final until after September 30, 2024.*

Attachment G

Year	FY 2023	FY 2024	CHANGE	% CHANGE
	7/1/22-9/30/23	7/1/23- 9/30/24	2023- 2024	2023- 2024
Applications YTD*				
Total	143,102	243,252	100,150	70.0%
MEAP	137,598	231,660	94,062	68.3%
EUSP Bill Payment	136,732	238,488	101,756	74.4%
EUSP Arrearage Retirement	68,921	164,524	96,603	140.16%
Gas Arrearage Retirement	28,096	119,402	91,306	321.4%
Receiving Benefits YTD**				

MEAP	96,721	94,205	-2,516	-2.6%
EUSP Bill Payment	96,367	114,230	17,863	18.5%
EUSP Arrearage Retirement	29,376	30,189	813	2.8%
Gas Arrearage Retirement	11,198	8,675	-2,523	-22.5%

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: 2024

<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>	<u>Benefit Level 6</u>	<u>Benefit Level 7</u>
EMPLOYMENT	5620	5697	8069	9174	6394	74	0
UNEMPLOYMENT	272	378	376	98	138	2	0
TCA	1842	51	9	5	1691	20	0
TDAP	373	2	4	1	264	5	0
SOCIAL SECURITY	4090	10899	11125	5583	11467	126	0
SSI	1799	2429	471	105	4746	58	0
VA/PENSION	288	228	415	406	272	2	0

ZERO INCOME	4963	23	25	15	1476	27	0
OTHER	3452	539	412	286	985	17	0
SELF-EMPLOYED	1406	623	429	275	208	4	0
CHILD - NO INCOME	2137	46	36	22	820	10	0
CHILD SUPPORT	529	59	28	10	372	7	0
Total :	26771	20974	21399	15980	28833	352	0

Note: This is Head of Household Source of Income and does not equal total households served.

Run Date: 12/10/2024 8:19:34 AM

Attachment I

Service Status of Recipients at Time of Application

<u>Supplier</u>	<u>On</u>	<u>Off</u>	<u>Total</u>
Totals For All Electric*	85,897	33,331	119,228
Totals For All Gas	33,544	14,739	48,283

*Includes EUSP and MEAP-only electric

Source: Department of Human Services Office of Home Energy Programs

