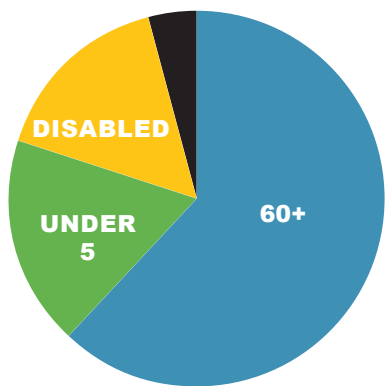




Proposed Changes and Economic Impact to the **Electric Assistance Program's** Tier 2 households

The Electric Assistance Program (EAP) has long been a lifeline for low income households across NH, providing crucial financial relief. However, a proposed change by the Public Utilities Commission (PUC) threatens to eliminate access to this essential program for over 5,900 households. If the income eligibility for Tier 2 households is reduced, this change will disproportionately impact the elderly, disabled individuals, and young families across multiple counties, leaving them without vital assistance.

The proposed adjustment to income eligibility for the EAP will remove households above 200% of the Federal Poverty Guidelines (FPG) from receiving assistance. This would reduce the Tier 2 population by over 40%, pushing already vulnerable populations further into financial instability.



Impact on Individuals & Communities:

- Approximately 5,900 households above 200% FPG would lose access to EAP.
- 62% of Tier 2 clients are over age 60, with 36% over 75—fixed income retirees without the means to supplement their income.
- 18% of affected households have children under the age of 5—working families on the brink of falling deeper into poverty.
- 16% are physically or mentally disabled, solely relying on Social Security benefits for survival.

Ripple Effects on Local Communities:

- Without EAP support, these households will turn to local resources like city welfare, straining municipal budgets and services.
- Counties have not faced this level of need since preCOVID times, and the removal of support will create a new, unmanageable burden on social services.
- Loss of EAP enrollment impacts other financial opportunities – such as potentially waived late fees & deposits or access to low-income budget plans with utilities.
- Starting in January 2025, many fixed-income clients—those receiving Social Security, Veterans’ benefits, or retirement pensions—will experience a Cost of Living Adjustment (COLA) increase. While this adjustment provides a slight financial boost, it will push a significant portion of elderly and vulnerable participants over the 200% Federal Poverty Guideline, rendering them ineligible for EAP assistance. These small income increases could lead to the unintended consequence of stripping away vital benefits, forcing these households to rely even more heavily on local welfare programs, further exacerbating the strain on communities already stretched thin.

The removal of EAP benefits would not only hurt thousands of vulnerable individuals but also burden local communities.

Please join us in advocating for the continuation of EAP in its current design to protect NH’s most at risk populations.

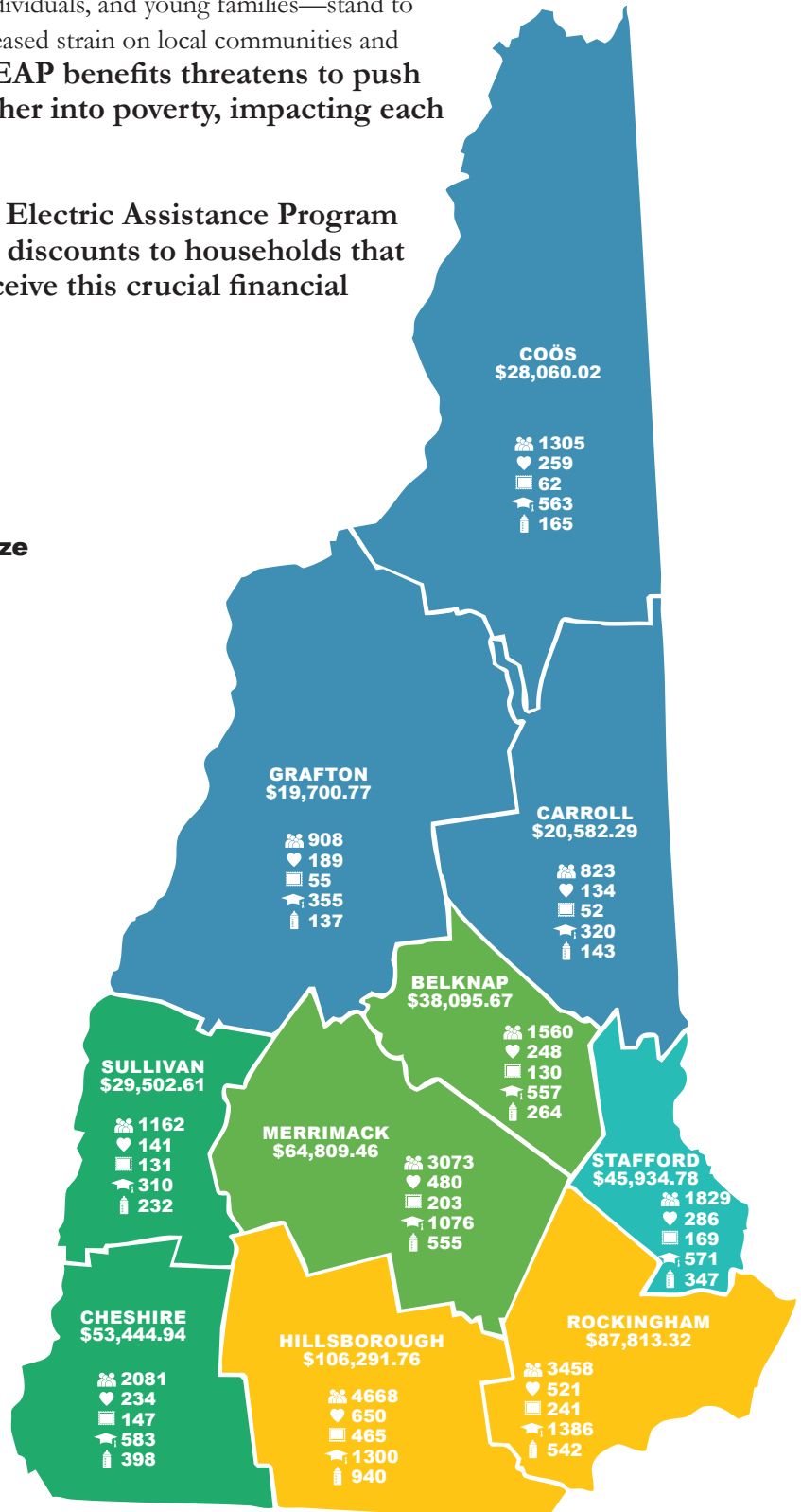
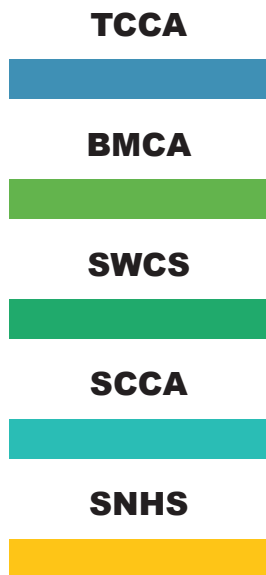


**Over \$400,000 in Essential Benefits at Risk:
 The Potential Impact on 5,900 NH Households**

The proposed changes to the Electric Assistance Program (EAP) could result in the loss of over \$400,000 in benefits, directly affecting 5,900 households across New Hampshire. These households—primarily elderly, disabled individuals, and young families—stand to lose vital financial support, leading to increased strain on local communities and municipal resources. **The removal of EAP benefits threatens to push these vulnerable populations further into poverty, impacting each county in NH.**

In the program year 2023-2024 alone, the Electric Assistance Program provided over \$492,000 in electric discounts to households that would no longer be eligible to receive this crucial financial assistance.

- Total Benefits Paid**
- Total Household Member Size**
- Total Disabled Person**
- Total Receive Food Stamp**
- Total > 75 Years Old**
- Total < of Age 5**





October 29, 2024

To whom it may concern:

My name is Elaine Wheeler. I am currently the Operations Manager of Energy Assistance Services at Tri-County CAP. I have been working with the Electric Assistance Program since its inception in 2002.

I have seen many changes to this program over the years.

One redesign that stands out occurred in 2011. There were two components to the redesign. The first component was to eliminate one tier, reducing the number of discount tiers from six to five. The second component was capping the monthly usage eligible for the discount to 700 kWh per month (this cap was revisited in 2013 and amended to 750 kWh per month).

Removing Tier 1 (5%) resulted in many applicants being displaced from the program... causing them financial distress. A 5% discount may seem nominal to some; however, to many struggling to pay their bills, 5% is a Godsend as every little bit helps to make paying their electric bills more manageable. This change also resulted in many phone calls and inquiries from disappointed, unhappy, and worried applicants questioning their removal from and discontinued eligibility for the program. In addition, because the income guidelines for the Fuel Assistance Program allowed them to continue to receive a fuel assistance benefit, they questioned why they were eligible for one program, but not the other. This produced a great deal of confusion and frustration.

This difference in the income guidelines was an ongoing issue for quite some time. It was bewildering to those applicants who completed one application that yielded two results... an approval for FAP and a denial for EAP. When the EAP income guidelines were amended to match the FAP income guidelines, the process of certifying applications became more efficient and straightforward. It eliminated the confusion of qualifying for one program but not the other, thereby cutting back the number of inquiries fielded by our offices. Reducing the number of phone calls to take and explanations to make allowed more time to concentrate on applications, resulting in a smoother process and a higher number of applications processed each day.

This previous change to the program is very similar to the modification currently proposed. Limiting the tier 2 discount to recipient households with income between 150 and 200 percent of the federal poverty level will again remove people from the program who truly need and appreciate the assistance. It will again yield two results to one application... an approval for FAP and a denial for EAP. It will again result in an onslaught of phone calls and inquiries from distressed applicants questioning the removal and the asking "what do I do now?"

As previously stated, 5% is not minimal to many... it is a great help to individuals and families with limited income and financial woes. Their appreciation is evidenced by the many thank you cards we receive for the discounts provided.

Elaine M Wheeler

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Coös County (603) 752-3248 Carroll County (603) 323-7400 Grafton County (603) 968-3560
www.tccap.org

CAA Cost projections for implementing T2 change	Current Cases
Total Tier 2 Households (records provided in July 2024)	12,730
Total Tier 2 Households over 200% SMI (records provided in July 2024)	5900

Additional Responsibilities	Total Number of Households	Time spent per Application or Staff	Total Hours	Average Hourly Cost	Number of Staff Impacted	Total Hourly Cost	Notes:
Re-training New & Current Program Staff (Cost Reoccurring moving forward)			3	\$22.09	105	\$6,958.35	
Additional Time to Calculate Income Eligibility	5900	0.10	590	\$19.29		\$11,381.10	Number of current T2 households over 200%FPG
Staff time to generate Denial letter with explanation	5900	0.03	177	\$19.29		\$3,414.33	
Staff time to print, fold, put in envelopes and mail 3 page Denial letters	5900	0.03	177	\$19.29		\$3,414.33	Number of current T2 households over 200%FPG
Staff communicating about Denial with households in-person, phone & email	4720	0.10	472	\$21.27		\$10,039.44	Estimate 80% of the 5900 denied will respond about denial
Estimated Households requesting to reapply (second round) - email application & forms	1770	0.01	17.7	\$19.29		\$341.43	Estimate 3540 will request application to reapply, 50% by email
Estimated Households requesting to reapply (second round) - mail application & forms	1770	0.02	35.4	\$19.29		\$682.87	Estimate 3540 will request application to reapply, 50% by mail
Estimated Households returning to reapply	3540	0.50	1770	\$19.29		\$34,143.30	Estimate 60% of the 5900 denied will reapply (3540 total)
Additional Time to Calculate Income Eligibility	2655	0.10	265.5	\$19.29		\$5,121.50	
Staff time to generate Denial letter with explanation	2655	0.03	79.65	\$19.29		\$1,536.45	
Staff time to print, fold, put in envelopes and mail 3 page Denial letters	2655	0.03	79.65	\$19.29		\$1,536.45	Estimate 75% of return applications are still over 200% FPG)
De-escalation Training			2	\$19.29	78	\$3,009.24	
Re-training within other CAA programs & outside agencies		1.00	516	\$23.00	43	\$11,868.00	
Create EAP Only Application			25	\$28.00		\$700.00	
Update all agency websites, brochures, literature and materials			20	\$23.00		\$460.00	
Total Administrative Costs in Detail						\$94,606.78	

Additional Supplies	Total Number of Households	Number of Staff Impacted	Cost of Supplies per Case or Staff	Total Cost of Supplies	Notes:
Re-training New & Current Program Staff	\	105	\$2.00	\$210.00	
Send first 3 page denial letter - Paper (0.009 each, 3 pages), printer ink (0.006 each), Envelope (0.17 each) and postage cost (0.69 each)	5900		\$0.74	\$4,366.00	Number of current T2 households over 200%FPG
Client requests second application to reapply (2 page app, 3 forms, postage) - send by email	1770			\$0.00	Estimate 3540 will request application to reapply, 50% by email
Client requests second application to reapply (2 page app, 3 forms, postage) - send by mail	1770		\$0.77	\$1,362.90	Estimate 3540 will request application to reapply, 50% by mail
Processing Second application, including forms and copies of income documentation	3540		\$0.14	\$495.60	Estimate 60% of the 5900 denied will reapply (3540 total)
Second Denial - Paper, Envelope and postage cost to send another denial letter	2655		\$0.74	\$1,964.70	Estimate 75% of return applications are still over 200% FPG)
Re-training within other CAA programs & outside agencies	\	43	\$5.00	\$215.00	
Create separate Marketing & Advertising materials			\$2,000.00	\$2,000.00	
Create EAP Only Application			\$50.00	\$500.00	
Distribute new printed EAP-Only Applications for CAAs	12,000		\$0.03	\$360.00	
Update all agency websites, brochures, literature and materials			\$800.00	\$800.00	
Total Additional Supplies Required				\$12,274.20	

Additions Required to Implement Change Initially:	Amount:
Total Additional Administrative Costs	\$94,606.78
Total Additional Supplies Required	\$12,274.20
Total Additional Costs to CAAs (to remove current T2 over 200%FPG)	\$106,880.98

Additions Required to Implement Change Moving Forward:	Amount:	Notes:
Total Additional Administrative Costs	\$47,303.39	Estimate 50% of 5900 household will reapply at least once per year or more. We estimate 50% of the above cost estimations provided will reoccur as additional annual estimates moving forward
Total Additional Supplies Required	\$6,137.10	
Total Reoccurring Costs moving forward	\$53,440.49	

Utility	Average Monthly Tier 2 Discount	Average Monthly Discount	Households	Per Month	Year Total
Eversource	\$6.03	\$6.52	1	\$6.52	\$78.24
Unitil	\$5.97	\$6.52	5900	\$38,469.29	\$461,631.46
NHEC	\$6.63				
Liberty	\$7.46				
Monthly Average	\$6.52	Potential Savings for removing all Tier 2 >200% FPG \$461,631.46			
Notes:					
Estimate provided to be achieved over 2 years due to almost 50% cases on 2 year recert					