

**GOVERNMENT OF PUERTO RICO
PUERTO RICO PUBLIC SERVICE REGULATORY BOARD
PUERTO RICO ENERGY BUREAU**

<p>NEPR</p> <p>Received:</p> <p>Feb 21, 2023</p> <p>6:33 PM</p>

IN RE: PERFORMANCE METRICS
TARGETS FOR LUMA ENERGY SERVCO,
LLC

CASE NO. NEPR-AP-2020-0025

**SUBJECT: Motion in Compliance with
Bench Orders Issued During the
Evidentiary Hearing**

**MOTION IN COMPLIANCE WITH BENCH ORDERS ISSUED DURING THE
EVIDENTIARY HEARING**

TO THE HONORABLE PUERTO RICO ENERGY BUREAU:

COME now **LUMA Energy, LLC** (“ManagementCo”), and **LUMA Energy ServCo, LLC** (“ServCo”), (jointly referred to as the “Operator” or “LUMA”), and respectfully state and request the following:

1. On February 7-10, 2023, this Honorable Puerto Rico Energy Bureau (“Energy Bureau”) held an Evidentiary Hearing in the instant proceeding (“Evidentiary Hearing”).
2. During the Evidentiary Hearing, the Energy Bureau issued two orders addressed to LUMA for compliance on or before February 21, 2023 (the “Bench Orders”). On February 9, 2023, during the testimony of Mr. Juan Fonseca regarding the “Day Sales Outstanding” performance metrics, the Energy Bureau requested LUMA to research and present findings for Louisiana, Arkansas, and Mississippi on the existing low-income subsidies or other assistance available to customers of the electric utilities in these jurisdictions.
3. The next day, February 10, 2023, the Energy Bureau issued its second Bench Order, instructing LUMA to clarify in writing the request included in its proposed Annex IX to the Puerto

Rico Transmission and Distribution System Operation and Maintenance Agreement pages 35 through 37, concerning relief from the “Day Sales Outstanding” performance metrics for 3-6 months after a moratorium period has been lifted. Specifically, the Energy Bureau directed LUMA to explain how such relief would be implemented, what would be considered, and how the weight distribution for said performance metrics would operate.

4. In compliance with the Bench Orders, LUMA hereby submits its responses to its findings on the existing low-income subsidies or other assistance available to customers of the electric utilities in Louisiana, Arkansas, and Mississippi, as well as supporting information on its proposal for relief from the “Day Sales Outstanding” performance metrics for 3-6 months after a moratorium period has been lifted, as *Exhibit 1* to this Motion.

WHEREFORE, LUMA respectfully requests that the Energy Bureau **takes note of the aforementioned** and **deem** LUMA complied with the Bench Orders issued during the Evidentiary Hearing.

RESPECTFULLY SUBMITTED.

We hereby certify that we filed this motion using the electronic filing system of this Energy Bureau. We will send an electronic copy of this motion to attorneys for PREPA, Joannely Marrero-Cruz, jmarrero@diazvaz.law; and Katuska Bolaños-Lugo, kbolanos@diazvaz.law, the Office of the Independent Consumer Protection Office, Hannia Rivera Diaz, hrivera@jrsp.pr.gov, and counsel for the Puerto Rico Institute for Competitiveness and Sustainable Economy (“ICSE”), Fernando Agrait, agraitfe@agraitlawpr.com, counsel for the Colegio de Ingenieros y a de Puerto Rico (“CIAPR”), Rhonda Castillo, rhoncat@netscape.net, and counsels for Comité Diálogo Ambiental, Inc., El Puente de Williamsburg, Inc., Enlace Latino de Acción Climática, Alianza Comunitaria Ambientalista del Sureste, Inc., Coalición de Organizaciones Anti-Incineración, Inc., Amigos del Río Guaynabo, Inc., CAMBIO, Sierra Club and its Puerto Rico Chapter, and Unión de Trabajadores de la Industria Eléctrica y Riego (jointly, Puerto Rico Local and Environmental Organizations), larroyo@earthjustice.org, rstgo2@gmail.com, notificaciones@bufete-emmanuelli.com, pedrosaade5@gmail.com, jessica@bufete-emmanuelli.com; rolando@bufete-emmanuelli.com, lvez@earthjustice.org, rmurthy@earthjustice.org, jcassel@earthjustice.org.

In San Juan, Puerto Rico, this 21st day of February 2023.



DLA Piper (Puerto Rico) LLC
500 Calle de la Tanca, Suite 401
San Juan, PR 00901-1969
Tel. 787-945-9107
Fax 939-697-6147

/s/ Margarita Mercado Echegaray
Margarita Mercado Echegaray
RUA NÚM. 16,266
margarita.mercado@us.dlapiper.com

/s/ Yahaira De la Rosa Algarín
Yahaira De la Rosa Algarín
RUA NÚM. 18,061
yahaira.delarosa@us.dlapiper.com

Exhibit 1

Performance Metrics

Docket ID: NEPR-AP-2020-0025

Response: RFI-LUMA-AP-2020-0025-20230210-PREB-001

SUBJECT

Days Sales Outstanding (DSO): General Customers and Government Customers

REQUEST

Clarify in writing LUMA's DSO metrics Special Considerations, pages 35-37 of Revised Annex IX (Oct 28th, 2022 filing) regarding the request that "LUMA should be relieved of these metric[s] during moratorium periods and for 3-6 months after [the moratorium] has been lifted. . . ." Also, the proposal for the PREB "to either give relief from or re-evaluate the DSO baseline and performance targets."

How would LUMA put into action the relief, what would LUMA take into consideration & how will it distribute the effective weight?

RESPONSE

LUMA's proposal for the PREB "to either give relief from or re-evaluate the DSO baseline and performance targets" in those circumstances where non-payment moratoriums are in place is that for periods when any non-payment moratorium is in place—and including 3 to 6 months after said moratorium is no longer in effect—LUMA will not include the DSO for the period in the calculation. This does not affect the metric other than allowing for LUMA's performance to be assessed during a normal period of operations that accurately represents performance that LUMA can control. LUMA proposes relief from these non-payment moratoriums mandated periods because they are government-mandated, and LUMA can no longer carry-out the complete dunning process that includes disconnections. Said dunning process is an integral part of the internal efforts to improve DSO. The effective weight of the metric is not impacted by the relief due to a non-payment moratorium, unless the non-payment moratorium period lasts the entire Contract Year, in which case the metric would be excluded for the Contract Year. The effective weight would be re-distributed among the other metrics within the Financial Performance category (in line with the base points assigned to each of the other metrics within this category).

To be clear, the proposed DSO baseline and performance targets do not include any finance changes. In the case that there are PREPA finance changes related to the M-8 or page 12 MOR, then the DSO baseline and performance targets should be re-evaluated so that LUMA can be accurately evaluated on DSO performance.

Performance Metrics

Docket ID: NEPR-AP-2020-0025

Response: RFI-LUMA-AP-2020-0025-20230210-PREB-002

SUBJECT

Existing Low-Income Subsidies

REQUEST

LUMA to research and present findings for Louisiana, Arkansas, and Mississippi on the existing low-income subsidies or other assistance available to customers of the electric utilities in these jurisdictions.

RESPONSE

To start the analysis, LUMA reviewed information regarding the availability of federal funding for low-income customers within Louisiana, Arkansas, and Mississippi. Research was then undertaken on the primary private energy providers in each state and the current and proposed rates offered by these energy providers to identify any rates and rebates designed to benefit low-income customers. Additional research was performed on the individual energy providers to identify utility programs offering bill and payment assistance to low-income customers and various non-profit and community agencies that work with the utilities to offer bill assistance for low-income customers.

The key findings of the research on private energy providers are provided below.

- **The Low-Income Home Energy Assistance Program (LIHEAP) is available in all three states.** This analysis finds that all three states take advantage of Low-Income Home Energy Assistance Program (LIHEAP) at the federal level by the Department of Health and Human Services. Each state has its own agency responsible for managing program funds to participants. Additionally, community organizations are involved in communicating the program and networking to increase awareness of the funds.
- **Eligibility requirements for LIHEAP vary by state based on median income levels.** Eligibility requirements for LIHEAP are further described in the detailed state-by-state findings below, based on household income and relative to each state's median income levels. Individuals who participate in the Supplemental Nutrition Assistance Program (SNAP), Social Security Disability Insurance (SSI), or Temporary Assistance for Needy Families (TANF) automatically qualify.
- **Discount rates for Low-Income customers are not uniformly available.** Each energy provider takes a unique approach to structuring their rates. While some providers offer a limited discount for low-income customers, such offerings are not commonplace across the three states.

- **Most energy providers offer bill assistance programs.** Most energy providers offer bill assistance programs and partner with local non-profit agencies to offer customers additional resources for utility payments. The individual rates and programs are described in greater detail below.

Additional detail and utility-specific information can be found below in **Section A. Findings – Private Energy Providers.**

LUMA also researched municipal utilities (utilities that are not private) and electric co-operatives in Louisiana, Arkansas and Mississippi. Of the random sample of municipal utilities and electric co-operatives surveyed in these three states, there was no clear evidence of any special rates or rate discounts for low-income customers. Additional information on the municipal utilities and electric co-operatives sampled for each of the three states are outlined below under **Section B. Findings – Municipal Utilities and Electric Co-Operatives.**

A. Findings – Private Energy Providers

Detailed state-by-state findings are provided below.

Arkansas:

- **Arkansas Low Income Home Energy Assistance Program¹**
 - **Description:** Helps low-income households with home energy costs by administering Regular Assistance and Crisis Intervention Programs. Each program provides financial assistance to eligible households with a one-time per year payment to the household's energy supplier or, under certain circumstances, to the applicant. The Crisis Intervention Program aids eligible households facing energy-related emergencies. Arkansas Energy Office is responsible for managing program applications, while 75 community organizations are involved in advocacy.
 - **Amount:** Minimum and maximum assistance amounts² are defined below:
 - Heating: \$100 - \$950
 - Cooling: \$48 - \$475
 - **Funding:** U.S. Department of Health and Human Services
 - **Eligibility:** A person who is a resident of Arkansas participates or has family members who participate in certain other benefit programs, such as SNAP, SSI, TANF automatically meets the eligibility requirement. Income eligibility requirements are defined accordingly:

¹ Benefits.gov. (n.d.). *Arkansas Low Income Energy Assistance Program*. Benefits.gov. <https://www.benefits.gov/benefit/1542>.

² The LIHEAP Clearing House. (n.d.). *Benefit Levels for Heating, Cooling, and Crisis*. <https://liheapch.acf.hhs.gov/tables/benefits.htm>.

Annual Household Income Limits (before taxes)

Household Size*	Maximum Income Level (Per Year)
1	\$20,385
2	\$27,465
3	\$34,545
4	\$41,625
5	\$48,705
6	\$55,785
7	\$62,865
8	\$69,945

- Energy Providers
 - Entergy Corporation
 - **Arkansas Homeowner Assistance Fund:**
 - **Description:** Federally funded program to prevent mortgage delinquencies and defaults, foreclosures, loss of utilities or home energy services, and displacement of homeowners experiencing financial hardship after January 21, 2020.
 - **Amount:** Average assistance amount is ~\$10,000, with over 2400 households helped since 2020³
 - **Funding:** Federally funded by the Department of Treasury with program administered by the Arkansas Development Finance Authority.⁴
 - **Eligibility:** An eligible household is defined as a mortgage holder household in which at least one or more individuals have experienced a reduction in household income, incurred significant costs, or experienced financial hardship after January 21, 2020; has fallen behind on one or more mortgage loan, property tax, property insurance and/or HOA/condo association payments; and has a household income at or below 150% of the area median or 100% of the median income for the United States (\$79,900), whichever is greater.⁴
 - Low Income Solutions Program⁵:
 - **Description:** Program provides cost-effective energy-efficient measures to single-family, manufactured, and multifamily homes throughout the Entergy Arkansas service territory. Participating trade allies perform energy audits and install energy-efficient upgrades as well as health and safety improvements. Upgrades may consist of measures such as air conditioner tune-ups, duct sealing, air sealing, and ceiling insulation
 - **Amount:** Not disclosed
 - **Funding:** Entergy
 - **Eligibility:** Owners or renters (certifying required consent) of single-family, manufactured, and multifamily homes are eligible for the Entergy Low-Income Solutions Program if: Entergy Arkansas provides retail electric

³ Arkansas Homeowner Assistance Fund. (2023, February 19). *Arkansas HAF Program Metric*. Arkansas Development Finance Authority. <https://arkansashaf.com/>.

⁴ Entergy Arkansas. (n.d.). *I Need Help Paying my Bill*. Entergy Arkansas <https://www.entergy-arkansas.com/bill-help/>.

⁵ Entergy Arkansas. (2022, January 1). *2022 Low-Income Solutions Program Guidebook*. Entergy Solutions Arkansas. https://cdn.entergy-arkansas.com/userfiles/content/energy_efficiency/docs/LIS_Guidebook.pdf

service to the residence; the occupants meet the statewide Low-Income Home Energy Assistance Program income criteria.

- Power to Care⁶:
 - **Description:** Local nonprofit agencies can provide emergency bill payment assistance to seniors and disabled individuals.
 - **Amount:** ~\$150, depending on agency
 - **Funding:** Full list of non-profit partners
 - **Eligibility:** Only applicable to seniors and disabled customers
- AEP SWEPSCO⁷
 - Neighbor to Neighbor Bill Pay⁸
 - **Description:** Program provides eligible customers with a utility assistance grant applied directly to their bill. Applications must be submitted in person.
 - **Amount:** Determined by project partner⁹
 - **Funding:** Administered by Dollar Energy Fund
 - **Eligibility:** You can apply for the Neighbor-to-Neighbor program at a local community action agency in your county or parish.
 - Emergency Rental Assistance Program¹⁰
 - **Description:** Emergency Rental Assistance program makes funding available to assist households that are unable to pay rent or utilities
 - **Amount:** Not disclosed
 - **Funding:** Department of Treasury
 - **Eligibility:** At least one member of your household has qualified for unemployment or should qualify, lost income, owed large expenses, or had other financial hardships. Your household income is below a certain amount, based on where you live, and at least one member of your household is experiencing housing instability, which means they are at risk of becoming homeless or would have trouble finding a stable place to live
- **Oklahoma Gas & Electricity (OG&E)**
 - Low Income Assistance Rider¹¹
 - **Description:** This rider shall be applied to all individually metered residential customers who are qualified by the Oklahoma Department of Human Services (DHS), and who are certified to OG&E by the DHS for payments under the federally funded Low Income Home Energy Assistance Program. Once certified, the customer will receive this credit for the next 24 billing months.
 - **Amount:** On all bills rendered under this rider, a credit of \$13.00 per month will be applied to the customer's bill
 - **Funding:** OG&E

⁶ Entergy Arkansas. (n.d.). *The Power To Care Agencies*. Entergy Arkansas. https://cdn.energy-arkansas.com/userfiles/content/our_community/Arkansas_Agency_List.pdf?_gl=1*z7j61t*_ga*NTQzOTQyNjEzLjE2NzYzOTE5Mzc*_ga_8YKL3FLBBC*MTY3NjM5MTkzNy4xLjEuMTY3NjM5MjcwMy4wLjAuMA..*_ga_DYMNBY5CD*MTY3NjM5MTkzNy4xLjEuMTY3NjM5MjcwMy4wLjAuMA..*_ga_HK6YSZ6LTO*MTY3NjM5MTkzNy4xLjEuMTY3NjM5MjcwMy4wLjAuMA..&_ga=2.163673974.819602663.1676391937-543942613.1676391937.

⁷ AEP Southwestern Electric Power Company (SWEPSCO). (2022, June 29). *Arkansas Compliance Tariff*. Southwestern Electric Power Company. https://www.swepco.com/lib/docs/ratesandtariffs/Arkansas/Arkansas_Compliance_Tariff_06-29-2022.pdf

⁸ SWEPSCO. (n.d.). *Neighbor-To-Neighbor Program*. SWEPSCO. <https://www.swepco.com/community/caring/neighbor-to-neighbor>.

⁹ Dollar Energy Fund. (n.d.). *Agency Finder*. Dollar Energy Fund. <https://www.hardshiptools.org/AgencyFinder.aspx>.

¹⁰ US Department of the Treasury. (n.d.). *Emergency Rental Assistance Program*. US Department of the Treasury. <https://home.treasury.gov/policy-issues/coronavirus/assistance-for-state-local-and-tribal-governments/emergency-rental-assistance-program>.

¹¹Oklahoma Gas and Electric Company. (2022, September 8). *Standard Pricing Schedule: Low Income Assistance Program Rider*. Oklahoma Gas and Electric Company. <https://www.oge.com/wps/wcm/connect/dac54aee-0feb-46b3-ae14-19e825d3fb8a/50.10+-LIAP+-+Stamped+Approved.pdf?MOD=AJPERES&CACHEID=ROOTWORKSPACE-dac54aee-0feb-46b3-ae14-19e825d3fb8a-oenfGIT>

- **Eligibility:** Qualification determined by Oklahoma Department of Human Services based on qualification from Arkansas LIHEAP

Louisiana:

- Louisiana Low Income Home Energy Assistance Program¹
 - Description¹²: Helps low-income households with home energy costs by administering Regular Assistance and Crisis Intervention Programs. Louisiana Housing Corporation administers the funding, and community organizations distribute it.
 - **Amount:** Minimum and maximum assistance amounts are defined below²:
 - Heating: \$200 - \$800
 - Cooling: \$200 - \$800
 - **Funding:** U.S. Department of Health and Human Services
 - **Eligibility:** Residents of Louisiana who meet income eligibility requirements defined accordingly:

# Household Members	Annual Household Income Limit	Monthly Household Income Limit
1	\$26,040	\$2,170
2	\$34,053	\$2,838
3	\$42,065	\$3,505
4	\$50,078	\$4,173
5	\$58,090	\$4,841
6	\$66,102	\$5,509
7	\$67,605	\$5,634
8	\$69,108	\$5,759
9	\$70,610	\$5,884
10	\$72,112	\$6,009

- Energy Providers¹³
 - Central Louisiana Electric Company¹⁴
 - CLECO Alternative Rate for Electricity Rider¹⁵
 - **Description:** Offers a discount to Residential Tariff Customers (those customers taking service under Schedule RS) qualifying as “low income.” The program, called CARE – Cleco Alternative Rate for Electricity, provides a 25% discount on the fuel portion of the Customer’s bill as calculated under rate schedule RS during the billing months of July, August, and September.
 - **Amount:** 25% discount on the fuel portion of customer bill
 - **Funding:** Annual application to enroll in program. Funded by CLECO with approval by the Louisiana Public Service Commission
 - **Eligibility:** Any household whose total yearly income before deductions are 60% of the state median income, which is the criteria followed by the

¹² CLECO. (n.d.). *Low Income Home Energy Assistance Program*. CLECO. <https://www.cleco.com/liheap>.

¹³ DNR Louisiana. (n.d.). *Investor-Owned Electric Utilities*. DNR Louisiana. http://www.dnr.louisiana.gov/sec/execdiv/techasmt/electricity/electric_vol1_1994/003.htm.

¹⁴ CLECO. (n.d.). *Rates & Fees*. CLECO Power LLC. <https://www.cleco.com/residential-commercial/rates-billing-payment/rates-fees>

¹⁵ CLECO. (2023, January 1). *CLECO Alternative Rate for Electricity Rider*. CLECO Power LLC. [https://cms-cleco.ae-admin.com/docs/default-source/rates-and-fees/rider-schedule/2023/29-care-cleco-alternative-rate-for-electricity-rider-eff-1-1-23-\(clean\).pdf?sfvrsn=deb4fe27_2](https://cms-cleco.ae-admin.com/docs/default-source/rates-and-fees/rider-schedule/2023/29-care-cleco-alternative-rate-for-electricity-rider-eff-1-1-23-(clean).pdf?sfvrsn=deb4fe27_2).

Federal Government's Low Income Home Energy Assistance Program (LIHEAP), may qualify.

- Entergy Louisiana (Formerly Gulf States Utility)
 - Experiment Rider for Low Income Senior Citizens¹⁶
 - **Description:** Program to remove charge from customer bill for low income senior citizens
 - **Amount:** The Customer Charge (\$4.46/month), as stated in § II of Schedule RS-G¹⁷ will not be applicable. All other charges (credits) and/or provisions of Schedule RS-G will remain unchanged.
 - **Funding:** Annual application to enroll in program. Funded by Entergy with approval by the Louisiana Public Service Commission
 - **Eligibility:** Located within the Legacy EGSL Service Area who are 65 years of age or older and whose total annual income for the household is \$10,000.00 or less taking Service under Schedule RS-G
- Entergy New Orleans¹⁸
 - No unique rates or programs found
- Southwestern Electric Power Company¹⁹
 - No unique rates or programs found

Mississippi:

- Arkansas Low Income Home Energy Assistance Program¹
 - Description: Provides financial assistance to eligible households in managing cost associated with Home Energy bills, Energy Crisis, Weatherization, and energy-related minor home repairs. Households may qualify for regular LIHEAP assistance and/or the Energy Crisis (emergency) Intervention Program (ECIP) for natural gas, wood, electricity, liquid propane/butane gas, and other energy-related services. Program Administered by Mississippi Department of Human Services.¹²
 - **Amount:** Minimum and maximum assistance amounts are defined below²:
 - Heating: \$1 - \$1,500
 - Cooling: \$1 - \$1,500
 - **Funding:** U.S. Department of Health and Human Services
 - **Eligibility:** Residents of Mississippi within 60 percent of the current State Median Income Poverty Guidelines.

¹⁶ Entergy Louisiana. (2015, October 1). *Experimental Rider to Schedule RS-G For Low Income Senior Citizens*. Entergy Louisiana LLC. https://cdn.entergy-louisiana.com/userfiles/content/price/tariffs/ell_elec_rs-sc-g.pdf?_gl=1*118kdnf*_ga*NDM4MDA0NjY5LjE2NzY0MDM0NzM.*_ga_8YKL3FLBBC*MTY3NjQwMzQ3My4xLjEuMTY3NjQwNDA0Mi4wLjAuMA.*_ga_2KJW590NWN*MTY3NjQwMzQ3My4xLjEuMTY3NjQwNDA0Mi4wLjAuMA.*_ga_HK6YSZ6LT0*MTY3NjQwMzQ3My4xLjEuMTY3NjQwNDA0Mi4wLjAuMA.&_ga=2.122268619.1789334424.1676403473-438004669.1676403473

¹⁷ Entergy Louisiana. (2015, October 1). *Residential Service Rate Schedule*. Entergy Louisiana. https://cdn.entergy-louisiana.com/userfiles/content/price/tariffs/ell_elec_rs-g.pdf?_gl=1*uopc6s*_ga*NDM4MDA0NjY5LjE2NzY0MDM0NzM.*_ga_8YKL3FLBBC*MTY3NjQwMzQ3My4xLjEuMTY3NjQwNDA0Mi4wLjAuMA.*_ga_2KJW590NWN*MTY3NjQwMzQ3My4xLjEuMTY3NjQwNDA0Mi4wLjAuMA.*_ga_HK6YSZ6LT0*MTY3NjQwMzQ3My4xLjEuMTY3NjQwNDA0Mi4wLjAuMA.&_ga=2.14724982.1789334424.1676403473-438004669.1676403473.

¹⁸ Entergy New Orleans. (n.d.). *Residential Rate and Rider Schedules*. Entergy New Orleans LLC. https://www.entergy-neworleans.com/your_home/tariffs/.

¹⁹ SWEPCO. (2023, January 31). *LPSC Electric Tariff*. SWEPCO. https://www.swepco.com/lib/docs/ratesandtariffs/Louisiana/LOUISIANA_Tariff_01-31-2023.pdf.

Household Size*	Maximum Income Level (Per Year)
1	\$8,154
2	\$10,986
3	\$13,818
4	\$16,650
5	\$19,482
6	\$22,314
7	\$25,146
8	\$27,978

*For households with more than eight people, add \$2,832 per additional person. Always check with the appropriate managing agency to ensure the most accurate guidelines.

- **Energy Providers**

- Cooperative Energy²⁰
 - No unique rates or programs found
- Entergy Mississippi²¹
 - No unique rates or programs found
 - Operation Bill Assist²²
 - **Description:** Shareholder donations for bill payment assistance and energy efficiency programs, including temporary bill assistance program for moderate-income customers who struggle to pay utility bills, but do not qualify for federal bill assistance programs. A one-time \$150 bill credit will be available for qualifying customers on a first-come, first-served basis. Funding for emergency utility bill payment help for older adults and customers with disabilities facing financial hardship. Qualifying customers may be eligible for up to \$1,000 for one or more months. These funds also provide agencies with administrative fees to cover added expenses associated with an increased volume of requests for help
 - **Amount:** \$150 one-time bill credit for moderate-income customers and up to \$1,000 for emergency utility bill payment
 - **Funding:** Shareholder donations
 - **Eligibility:** To qualify, customers must have a total household income of up to 250% of the federal poverty level, as listed in the chart below. Eligibility requirements by household size and income:

²⁰ Cooperative Energy. (n.d.). *Rates, Fees, and Services*. Mississippi County Electric Cooperative. <https://mceci.com/rates-fees-services>

²¹ Entergy Mississippi (n.d.). *Residential Rate and Rider Schedules*. Entergy Mississippi LLC. https://www.energy-mississippi.com/your_home/tariffs/.

²² Entergy Mississippi (n.d.). *I Need Help Paying My Bill*. Entergy Mississippi LLC. <https://www.energy-mississippi.com/bill-help/>.

Household Size	250% FPIG Annual Income
1	\$33,975
2	\$45,775
3	\$57,575
4	\$69,375
5	\$81,175
6	\$92,975

- Mississippi Power²³
 - No unique rates or programs found
 - **Project Share**
 - **Description:** program to assist the elderly, handicapped, medically disabled, and others in need who are having difficulty paying their electric service bill.
 - **Amount:** \$300 annually
 - **Funder:** Catholic Charities
 - **Eligibility:** Customers in the program demographic with a demonstrated financial need

B. Findings – Municipal Utilities and Electric Co-Operatives

Arkansas

In a random sample of 5 of 17 electric co-operatives and 5 of 15 municipal utilities in Arkansas, we found no evidence of any special rates or rate discounts for Low Income customers.

The sample of municipal utilities and electric co-operatives in Arkansas consisted of the following utilities:

Co-operatives Utilities	Municipal Utilities
1. Arkansas Valley Electric Cooperative Corp	1. Bentonville Electric System
2. Carroll Electric Cooperative Corporation	2. Clarksville Light and Water Company
3. First Electric Cooperative Corporation	3. Ketchikan Public Utilities
4. Ozarks Electric Cooperative	4. Prescott Water & Light Company
5. Woodruff Electric Cooperative Corporation	5. West Memphis Utility Commission

²³ Mississippi Power. (n.d.). *Pricing & Rates*. Mississippi Power. <https://www.mississippipower.com/residential/pricing---rates.html>

Source: Arkansas Department of Energy and Environment²⁴ (ADEQ), Arkansas Electric Cooperative Corporation²⁵ (AECC), Energy Information Administration²⁶ (EIA), National Rural Electric Cooperative Association²⁷ (NRECA)

Louisiana

In a random sample of 5 of 12 electric co-operatives and 5 of 19 municipal utilities in Louisiana, we found no evidence of any special rates or rate discounts for Low Income customers.

The sample of municipal utilities and electric co-operatives in Louisiana consisted of the following utilities:

Co-operatives Utilities	Municipal Utilities
1. Dixie Electric Membership Corp	1. City of Alexandria
2. Jefferson Davis Elec Coop, Inc	2. City of Lafayette
3. Northeast Louisiana Power Coop Inc	3. City of Natchitoches
4. South Louisiana Elec Coop Assn	4. City of Ruston
5. Southwest Louisiana EMC	5. Terrebonne Parish Consol Gov't

Source: Association of Louisiana Electric Cooperatives²⁸ (ALEC), Energy Information Administration²⁹ (EIA), Louisiana Energy and Power Authority³⁰ (LEPA), National Rural Electric Cooperative Association²⁷ (NRECA)

Mississippi

In a random sample of 5 of 26 electric co-operatives and 5 of 23 municipal utilities in Mississippi, we found no evidence of any special rates or rate discounts for Low Income customers.

The sample of municipal utilities and electric co-operatives in Mississippi consisted of the following utilities:

Co-operatives Utilities	Municipal Utilities
1. East Mississippi Electric Power Association	1. Oxford Electric Department
2. Tombigbec Electric Power Association	2. Public Service Commission of Yazoo City

²⁴ Arkansas Department of Energy and Environment (ADEQ). (n.d.). *Utilities*. ADEQ. <https://www.adeq.state.ar.us/energy/resources/utilities.aspx>

²⁵ Arkansas Electric Cooperative Corporation (AECC). (n.d.). *About Us*. AECC. <https://aecc.com/about-us/arkansas-electric-cooperatives-inc/>.

²⁶ Energy Information Administration (EIA). (2009, December). *"List of Covered Electric Utilities" under the Public Utility Regulatory Policies Act of 1978 (PURPA)*. EIA. <https://www.energy.gov/oe/articles/list-covered-electric-utilities-under-public-utility-regulatory-policies-act-1978-1>

²⁷ National Rural Electric Cooperative Association (NRECA). (n.d.). *NRECA Member Directory*. NRECA. <https://www.electric.coop/our-organization/nreca-member-directory>.

²⁸ Association of Louisiana Electric Cooperatives (ALEC). (n.d.). *Members*. ALEC. <https://www.alec.coop/members/>.

²⁹ Energy Information Administration (EIA). (n.d.). *2021 Utility Bundled Sales to Ultimate Customers – Residential*. EIA. https://www.eia.gov/electricity/sales_revenue_price/pdf/table6.pdf.

³⁰ Louisiana Energy and Power Authority (LEPA). (n.d.). *Our Mission*. <https://lepa.com/#:~:text=Our%20Mission,own%20independent%20municipal%20power%20system>.

Co-operatives Utilities	Municipal Utilities
3. Twin County Electric Power Association	3. Canton Municipal Utilities
4. Pearl River Valley Electric Power Association	4. Greenwood Utilities Commission
5. Southern Pine Electric Power Association	5. Louisville Electric System

Source: Electric Cooperatives of Mississippi³¹ (ECM), Energy Information Administration²⁹ (EIA), National Rural Electric Cooperative Association²⁷ (NRECA)

³¹ Electric Cooperative of Mississippi (ECM). (n.d.). *Member Cooperative*. ECM. https://ecm.coop/members/member_cooperatives