

STRUCTURING A LOW-INCOME "WIRES CHARGE"
FOR OKLAHOMA

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In addition, Colton has authored four books on low-income energy policy, including *On the Brink of Disaster: A State-by-State Analysis of Low-Income Natural Gas Winter Heating Bills*; *The Other Part of the Year: Low-Income Households and Their Need for Cooling: A State-by-State Analysis of Low-Income Summer Electric Bills*; *Energy Efficiency and the Low-Income Consumer: Planning, Designing and Financing*; and *Funding Fuel Assistance: State and Local Strategies to Help Pay Low-Income Home Energy Bills*. Each of these four books is available from FSC Publications in Belmont, MA.

INTRODUCTION

This paper considers the outlines of a "wires charge" within the State of Oklahoma. Prepared at the request of Oklahoma Association of Community Action Agencies (OACAA) for presentation to a "stakeholder's meeting" considering electric industry restructuring issues sponsored by the Oklahoma Corporation Commission, the paper will present a detailed outline, using Oklahoma-specific data, of a wires charge through which the State may generate revenues for low-income home energy assistance. The charge is not intended to address the broader issues of how activities such as research and development (R&D), non-low-income energy efficiency investments, and the like, might be funded in a restructured, competitive electric industry.

More specifically, the discussion below will concentrate on three major issues:

oWhat is the need for a low-income wires charge in the State of Oklahoma?

oWho should pay for the wires charge? and

oHow might a wires charge be structured?

Clearly, subsumed within these broader issues are other important discussions. How can a wires charge be made competitively neutral? On what basis should a wires charge be imposed? Who should collect and distribute the revenues generated by a wires charge? These other issues are highlighted in the text below.

Finally, the "decision points" identified by the discussion below will be collected in Appendix A and recommendations advanced on what is most appropriate from a public policy, and administrative feasibility, perspective. Tables are included in Appendix B.

THE NEED FOR LOW-INCOME ENERGY AFFORDABILITY ASSISTANCE IN OKLAHOMA

An Oklahoma wires charge should seek to fill two needs for the State's low-income residents: (1) the need for cash fuel assistance; and (2) the need for energy efficiency improvements. Both of these needs will be considered below. The conclusion will be that there is a substantial need for cash assistance as well as for energy efficiency improvements.

The Need for Generating Cash Fuel Assistance through a Wires Charge

Oklahoma has a significant number of low-income households, most of which experience unaffordable home energy burdens. A home energy burden is the home energy bill as a percentage of income. In determining the need for fuel assistance, it is appropriate to look at low-income energy burdens. This is the approach now incorporated into the federal statute creating the Low-Income Home Energy Assistance Program (LIHEAP), which mandates that LIHEAP benefits be targeted to households who have the lowest incomes and the highest bills in relation to income taking into account household size. Moreover, in 1994, Congress described "highest home energy needs" as

taking into consideration energy burdens and defined "energy burden" as "the expenditures of the household for home energy divided by the income of the household."

Within this framework of home energy burdens, the provision of cash fuel assistance (including utility rate discounts) should focus on total home energy bills for low-income households. While public policy traditionally has focused attention on home *heating* needs, this policy is too narrow in its coverage. Instead, two aspects of home energy should be considered: (1) home heating on the one hand; and (2) home electric usage (including home cooling) on the other hand. National figures show that home heating represents less than fifty percent (50%) of total low-income home energy consumption. State-specific studies by FSC have found, too, that while low-income heating *consumption* is less than non-heating consumption, low-income heating *bills* represent even a smaller percentage of total low-income energy bills.¹¹ Hence, for example, while heating consumption may represent 45 percent of total consumption, heating bills might represent 35 percent of total bills.

In short, the home energy needs of low-income households in Oklahoma consist of two different components: (1) heating bills on the one hand; and (2) non-heat electric bills on the other hand. A discussion of the need for cash assistance should take both into account.

Home Heating Bills in Oklahoma

Winter home heating bills in Oklahoma impose unaffordable burdens on low-income households when considered in light of household income. For purposes of demonstrating this conclusion, several populations will be used as a surrogate for the entire "low-income" population: (a) households who receive LIHEAP benefits; (b) households who receive benefits through Aid to Families with Dependent Children (AFDC);¹² (c) households who receive Supplemental Security Income (SSI); and (d) households who receive Social Security (retired widows and widowers).¹³

As Table 1¹⁴ demonstrates, each of these populations of households experiences a winter home heating burden --these figures do not include winter non-heat electric burdens-- which likely push them beyond "affordable" levels. While LIHEAP recipients experience winter home heating burdens of roughly 14 percent, the home heating burden of AFDC households is nearly 20 percent. Social Security recipients have burdens which are somewhat lower.

¹¹See e.g., Colton, Sheehan, *et al.* (1995). *An Assessment of Low-Income Energy Needs in Washington State*, Fisher, Sheehan & Colton, Public Finance and General Economics: Scappoose, OR; Colton (1996). *Home Energy Assistance Review and Reform in Colorado*, Fisher, Sheehan & Colton, Public Finance and General Economics: Belmont, MA.

¹²AFDC is what most people think of as "welfare."

¹³Thus, not included in Social Security are disability recipients.

¹⁴All Tables are set forth in Appendix B.

These home heating burdens can be beneficially compared to the "shelter" burdens which the U.S. Department of Housing and Urban Development (HUD) has defined to be "affordable." According to HUD, if a household faces a *shelter* burden exceeding 30 percent of income, that household is over-extended. Shelter burdens include rent/mortgage payments plus all utility payments other than telephone.⁵⁾ A household that is paying 14 percent of its income simply toward home heating --again, not taking into account electricity as well-- will not be able to fall below this 30 percent limit.

The significance of the home heating burdens imposed on low-income households is even more apparent when one considers the full range of incomes at which low-income residents of Oklahoma live. Most households who qualify for LIHEAP in Oklahoma by living at or below 150 percent of Poverty live *below* the ceiling rather than *at* the ceiling. Table 2 sets forth the actual distribution of winter heating burdens for Oklahoma LIHEAP recipients for the most recent year in which data is available. While it is a simple matter of arithmetic that energy burdens as a percentage of income will increase as dollar incomes decrease, the *magnitude* of the burden at the lower income levels may be somewhat stunning. As Table 2 shows, a household with an annual income of \$0 to \$2000 will have winter heating burdens⁶⁾ of more than 70 percent; households living with annual incomes of \$2000 to \$4000 will have winter heating burdens of roughly 25 percent; and households living with annual incomes of \$4000 to \$6000 will have winter heating burdens of nearly 15 percent.

The number of households with these extremely low levels of annual incomes (and thus high heating burdens) is not small. Table 3 shows that amongst the roughly 90,000 Oklahoma LIHEAP participants, more than 62,000 (72 percent) lived with incomes of less than \$6,000 in Fiscal Year 1990 - 1991.

Non-Heating Home Energy Bills in Oklahoma

Focusing attention only on heating bills generally results in inadequate attention being devoted to the impacts of *electric* policy on low-income households. This focus is misplaced. As shown in Table 4, low-income electric *non*-heating consumption represents roughly 35 - 40 percent of low-income usage and 60 - 65 percent of low-income bills.

As can be seen, even for low-income households (who have less discretionary electric consumption than the population as a whole), heating bills are only roughly 35 - 40 percent of total energy bills. What happens to the price of electricity is thus important to low-income consumers.

Summer electric bills can be just as unaffordable to low-income households as winter heating bills are. As Table 5 shows, summer electric bills (500 kWh/month) for Oklahoma's eight largest electric companies impose burdens as a percentage of income ranging from 25 percent to nearly 30 percent of income for public assistance recipients.⁷⁾

⁵⁾Hence, for example, the utility payments would include home heating, electricity, water/sewer, and garbage and/or trash pick-up where appropriate.

⁶⁾Remember, these do *not* include electric bills in addition to heating bills. Taking electric bills into account would drive burdens even higher.

⁷⁾Again, according to HUD, if total shelter costs exceed 30 percent, a household is financially overextended.

The conclusions from this data are several fold *vis a vis* a wires charge for Oklahoma. The need for cash fuel assistance is great in Oklahoma, both in terms of dollars and in terms of the number of households in need. Second, with many of these households, the need for cash assistance cannot be alleviated through reduced bills generated by improvements in energy efficiency. Third, given the income of these households, virtually *any* energy bill will impose unaffordable burdens. Fourth, the energy problems of these households are not household budgeting problems. There is, instead, an absolute mismatch between household resources and expenses. Finally, given the energy burdens facing low-income households, there will be an inevitable need for a crisis intervention fund to prevent the loss of service due to inability-to-pay.

The Need for Low-Income Energy Efficiency Assistance through a Wires Charge

In addition to the need for cash fuel assistance to be funded through a wires charge, a significant number of low-income households in Oklahoma are in need of energy efficiency improvements. It is difficult, if not impossible, to quantify the precise number of low-income units in Oklahoma that are in need of energy efficiency improvements. Some rough estimates can be made, however. In 1995, there were roughly 335,000⁸⁾ low-income households in Oklahoma.⁹⁾ According to state Weatherization Assistance Program (WAP) officials, Oklahoma has weatherized roughly 11,000 homes from 1989 through 1995.¹⁰⁾ Due to decreased funding levels, however, the number of units per year has dropped in recent years. The units of production in FY 1995 was the lowest in seven years.

⁸⁾This is a calculated number. In 1990, there were roughly 330,000 low-income households (at or below 150% Poverty) in Oklahoma. According to HUD, Oklahoma experiences roughly 7,000 new housing units per year authorized by building permits, of which approximately 15 percent (1,000/year) are likely to be inhabited by low-income households. There will some duplicated households here, since some of the inhabitants of the new housing will come from the 810,000 existing low-income households. Nonetheless, a rough estimate equal to $330,000 + (1000/\text{year} \times 6 \text{ years}) = 335,000$ seems appropriate.

⁹⁾For these purposes only, "low-income" is defined to be at or below 150 percent of the federal Poverty Level. If, as recommended below, "low-income" is instead defined to include all households at or below 200 percent of Poverty, this total population would need to be increased.

¹⁰⁾Due to changes in technology and program requirements, homes weatherized prior to 1988 are assumed to be in need of re-weatherization.

| 1989 | 1990 | 1991 | 1992 | 1993 | 1994 | 1995 |
|-------|-------|-------|-------|-------|-------|-------|
| 1,560 | 1,493 | 1,586 | 1,507 | 1,536 | 1,721 | 1,389 |

In addition, much of the total weatherization funding is in jeopardy over the long-term. Of the 1,389 units weatherized in Fiscal Year 1995, for example, 462 involved a block grant transfer from the federal LIHEAP program. Indeed, LIHEAP has funded roughly one-third of the total units weatherized in Oklahoma since 1989. Should the LIHEAP program continue to be substantially reduced, however, it is reasonable to expect transfers to weatherization to be curtailed or eliminated.

In addition to units weatherized through WAP, there will be some low-income households who live in homes that were newly constructed in compliance with adequate energy efficiency standards. These homes are assumed to be in no further need of weatherization. Given the difficulty in quantifying how many low-income households live in these units of new construction, there has been no attempt to adjust for this factor.

Assuming no unduplicated fully weatherized homes treated by utilities in that time,¹¹ roughly 320,000 low-income housing units thus remain to be weatherized in Oklahoma.¹²

Assuming continuing WAP production levels of 1,000 units per year, assuming further that no weatherized house will ever need to be re-weatherized, and assuming finally that no expansion in Oklahoma's low-income population will occur, these un-weatherized homes will all be treated with energy efficiency improvements within the next 320 years. Clearly, an additional source of low-income energy efficiency funding is needed.

Age of Low-Income Housing Units in Oklahoma

Two additional ways exist to develop a surrogate for energy efficiency needs in low-income housing in Oklahoma. While, as mentioned above, no direct measurement exists of the number of energy inefficient low-income housing units in Oklahoma, some correlation can be drawn between energy inefficiency and the age of housing units. Table 6 sets out the number of Oklahoma households, at different levels of "being poor," distributed by the age of the housing units in which they live. As can be seen, while it is impossible to conclude with any specificity the actual *extent* of energy inefficiency, it is possible to see the potential that hundreds of thousands of low-income Oklahoma households live in old, and presumptively energy inefficient, housing units. Roughly 83,000 households living at or below 50 percent of median income live in housing that was constructed before 1940. About 120,000 households living at or below 80 percent of median income live in housing that was constructed before 1940, more than 55 years ago.

¹¹Homes treated by utility DSM programs are assumed either to be done in cooperation with the WAP program, or assumed, in the alternative, not to have been provided heating efficiency improvements.

¹²This is calculated as follows: 335,000 minus 11,000 weatherized homes = 324,000 rounded down to 320,000.

Moreover, these households do not refer to all housing units, but rather simply to housing units that are affordable (i.e., yield total shelter burdens at or below 30 percent of income) at those income levels.

Affordability of Housing Units

A different surrogate to be used to identify the need for energy efficiency improvements involves shelter burden. The starting point again is HUD's rule that a household which devotes in excess of 30 percent of income toward shelter costs are over-extended.^{13\} Table 7 presents the number of Oklahoma households who are called upon to pay either more than 30 percent of their income or more than 50 percent of their income toward their shelter costs. As this Table shows, more than 230,000 Oklahoma households living at or below 80 percent of median income pay more than 30 percent of their income, and nearly 110,000 households at those income levels pay more than 50 percent of their income toward their total shelter costs.

Given the discussion above as to home energy burdens, it is clear that home energy bills contribute to the lack of shelter affordability. A review of monthly Fair Market Rents (FMRs),^{14\} and the extent to which utility bills contribute to those monthly shelter costs, is set forth in Table 8.^{15\} This Table shows utility bills in relation to total shelter costs in the two major Oklahoma cities for which data is available. Utility bills represent from roughly 30 to nearly 40 percent of total shelter costs. To the extent that energy efficiency can reduce these bills, overall shelter affordability will improve. Conversely, the lack of shelter affordability indicates a potential for beneficial energy efficiency improvements.

Finally, Table 9 presents the number of Oklahoma units that are "affordable" but which have some type of physical problem associated with them. As can be seen, three-in-four affordable units for Oklahoma households at 0 - 30 percent of median income (25%), one-in-five affordable units for Oklahoma households at 31 - 50 percent of median income (21%), and one-in-four affordable units for Oklahoma households at 51 - 80 percent of median income (28%) have some type of physical problem. If one engages in the assumption that households with "physical problems" are likely to have energy efficiency problems as well, the extent of the acute need for low-income energy efficiency improvements in Oklahoma is evident.

Utility Benefits from Low-Income Energy Efficiency

^{13\}As discussed above, shelter costs include rent/mortgage payments plus all utilities except telephone service.

^{14\}FMRs concededly do not include mortgage payments. FMRs set by HUD are based on area rents at the 40th percentile.

^{15\}R.Colton (1994). *The Role of Utility Costs in Setting Fair Market Rents For Section 8 Housing*, presented in, *Section 8 Housing Assistance Payments Program--Fair Market Rent (FMR) Schedules for Use in the Rental Certificate Programs, Loan Management and Property Disposition Programs, Moderate Rehabilitation Program and Rental Voucher Program*, HUD Docket No. N-94-3754 (October 1994) (presented on behalf of ten Legal Services Corporation offices) (looking at data from 100 cities in 38 states and the District of Columbia).

In addition to looking at energy efficiency from the household perspective, it is necessary to examine the benefits of a low-income energy efficiency program from the perspective of the utility offering such a program. Extensive research has found that low-income energy efficiency programs result in substantial non-energy savings to utilities. These non-energy savings include reductions in working capital expense, uncollectible accounts, credit and collection expenses, and the like.¹⁶⁾ The results of one of the most recent studies are summarized in Table 10. Table 10 shows the results of the Pennsylvania Low-Income Usage Reduction Program (LIURP) for all Pennsylvania utilities. The Table presents pre-treatment and post-treatment payment patterns for the low-income households to whom energy efficiency was delivered. A payment of less than 100 percent means that the low-income household was not even paying the current month's utility bill. In contrast, a payment *exceeding* 100 percent means that the low-income household was not only paying the current bill, but was paying off its arrears as well.

As Table 10 shows, for every Pennsylvania utility but one, the delivery of energy efficiency substantially improves the payment patterns of the treated low-income households. Indeed, the general impact of the delivery of energy efficiency was a *substantial* increase in the payment coverage of the household energy bill. In most cases the low-income household moved from a situation where that customer was falling further and further behind by failing to pay the current bill to a situation where the household was paying the entire current bill and beginning to retire the arrears.

Summary

A wires charge to fund low-income programs in Oklahoma should be used for two different purposes. Each purpose is not only appropriate, but essential. The first purpose of a wires charge in Oklahoma is to generate cash fuel assistance to be delivered to low-income households. This cash assistance should include both a basic grant component and a crisis intervention component. The second purpose is to generate funding for the delivery of low-income energy efficiency improvements.

THE COST OF A "WIRE CHARGE" IN OKLAHOMA

Having established the need for a "wires charge" in Oklahoma, the next question to be addressed is the cost which creating such a charge would impose on Oklahoma ratepayers. Three different sets of assumptions are used in the Tables below. Tables 11 and 12 are based on the assumption that a "wires charge" is imposed on end-use consumption involving electricity and natural gas. Table 13 is based on the assumption that a wires charge is imposed only on end-use consumption involving electricity. Finally, Tables 14 and 15 are based on the assumption that a "wires charge" is based on all fuels.¹⁷⁾ In each of these three sets of assumptions, the impacts of levying a wires charge on

¹⁶⁾Colton (1995). *Energy Efficiency and the Low-Income Consumer: Planning, Designing and Financing*, at Chapter 7, Fisher, Sheehan & Colton, Public Finance and General Economics: Belmont, MA (summarizing existing utility research examining non-energy benefits).

¹⁷⁾As can be seen, in general, the term "wires charge" is thus used for simplicity's sake, and not used to indicate that the entire burden of the charge is to be imposed on electric customers. In addition, however, one scenario examined below involves an electric only wires charge.

residential consumption alone and on residential, commercial and industrial consumption combined, are assessed.

Tables 11, 12, 14 and 15 below are each set forth in four parts. The four parts assume differing levels of low-income assistance funding. Tables 11 through 15 assume funding at 100 percent of the 1986 Oklahoma LIHEAP appropriation (in 1995 dollars), as well as 125 percent, 150 percent and 200 percent.^{118\} Table 13, the Table which includes the electric only analysis, has a fifth part. The electric only analysis examines funding at 50 percent, as well as 100 percent, 125 percent, 150 percent, and 200 percent of the 1986 LIHEAP appropriation (1995 dollars).^{119\} More particularly:

oTable 11 assumes that an electric/natural gas wires charge in Oklahoma is imposed only on residential ratepayers.

oTable 12 assumes that, in the alternative, an electric/natural gas wires charge in Oklahoma is imposed on all end-use consumption of the stated fuels for industrial, commercial and residential customers.

oTable 13 assumes that an electric-only wires charge is imposed in Oklahoma. The Table considers a charge on residential consumption alone on the one hand, and a charge on all end-use consumption for industrial, commercial and residential customers on the other hand.

oTable 14 assumes a wires charge in Oklahoma is imposed on residential consumption for all fuels.

oTable 15 assumes that a wires charge in Oklahoma is imposed on all fuels for residential, commercial and industrial customers.

The Tables are intended to generate four pieces of data on a state-specific basis for Oklahoma: (a) the per unit of energy cost of a wires charge of the specified amounts for each fuel type; (b) the *total* cost allocated to each fuel type arising out of a wires charge of the specified amounts; (c) the difference caused by allocating program costs only to residential versus allocating program costs to aggregate residential, commercial and industrial end-use; and (d) the dollar contribution of each class of customers if spread over residential, commercial and industrial customers.

Methodology

^{118\}The recommendation is to address total home energy bills, not simply home heating bills. Since LIHEAP is primarily a heating assistance program, a total home energy program is assumed to require additional funding.

^{119\}The lesser proportion is to provide an alternative which involves scaling back benefits to address only electric usage. This scenario is to provide a basis for some consideration of the impact of not developing a source of funds to provide benefits for any consumption using natural gas or bulk fuels.

The methodology employed in Tables 11 through 13 begins with the estimated funds that are desired to be generated through the wires charge. The estimated funds are tied to the 1986 LIHEAP appropriation (adjusted to 1995 dollars).^{120\} The estimates are then incrementally adjusted upwards to provide information should decisionmakers wish to generate additional dollars beyond historic LIHEAP levels to assist in meeting total home energy needs rather than simply home heating needs. The electric-only analysis, however, adds a fifth scenario (50%) to provide a basis for evaluating the impacts should the assistance provided through an electric-only wires charge be scaled back to reflect a decision to limit the use of the funds only to electric assistance. The inclusion of this 50% scenario should be construed only as an effort to help provide decisionmakers with information; it does not represent an endorsement of this approach.

The funds estimated through the various scenarios are then distributed via an allocator. In the scenario where the funds are distributed solely to the residential class, the funds are divided by the total number of mmBtu consumed by the residential customer class in Oklahoma to derive a cost per Btu. That cost per Btu is then multiplied by the Btu's per unit of fuel to derive a per unit of fuel cost (*i.e.*, cost per MCF, cost per kWh). The cost per Btu is further multiplied by the number of Btu consumed within each fuel class at the end-use level to determine the total dollars to be derived from each fuel source. The effect of this methodology is to assign a responsibility to each fuel source equal to the proportion of end use residential energy supplied by that fuel source of a per Btu basis.

The same process is used for the section that distributes the cost over all residential, commercial and industrial end-use consumption. The total dollars desired are divided by the total end use consumption from those three customer classes. The per Btu cost is then multiplied by the number of Btu in each type of fuel unit to derive a per unit of fuel cost, and multiplied by the total number of Btu consumed at the end use level to derive the total contribution which each fuel type would make to the bottom line. This results in an allocation based not on the proportion of end use fuel type within only the residential class, but by the proportion of end use fuel type within all customer classes combined.

The 100% scenario is set forth in Tables 11A, 12A, 13A, 14A and 15A; the 125% scenario is set forth in Tables 11B, 12B, 13B, 14B and 15B; the 150% scenario is set forth in Tables 11C, 12C, 13C, 14C and 15C; and the 200% scenario is set forth in Tables 11D, 12D, 13D, 14D and 15D. Table 13E reflects the electric-only 50% scenario.^{121\}

Allocating Costs Only to Residential Customers: Natural Gas and Electric

^{120\}The 1986 LIHEAP appropriation was the highest appropriation for the nation as a whole. In 1986, Oklahoma received \$17,417,510 in LIHEAP funds. U.S. Department of Health and Human Services, *Low Income Home Energy Assistance Program, Report to Congress for Fiscal Year 1986*, at Table C-4, page 67 (July 1987).

^{121\}There is no corresponding Table E in other sets of Tables.

A wires charge designed to generate 100 percent of the 1986 LIHEAP appropriation in Oklahoma (1995\$) imposed only on the residential customer class would result in a price increase of the following for natural gas and electric users in Oklahoma:

roughly 1.0 cents per CCF for natural gas users. Assuming a consumption of roughly 1,100 CCF per year, this results in an annual bill increase of roughly \$11, or about \$0.92 per month.

roughly three one-hundredths of a cent per kWh for electricity users. Assuming a consumption of 9,000 kWh per year, this results in an annual bill increase of \$3.00, or about 25 cents per month.

In contrast, a wires charge designed to generate 200 percent of the 1986 LIHEAP appropriation in Oklahoma (1995\$) imposed only on the residential class would result in a price increase of the following for natural gas and electricity in Oklahoma:

roughly 2.0 cents per CCF for natural gas users. Again, assuming an annual consumption of roughly 1,100 CCF, this results in an annual bill increase of roughly \$22, or about \$1.84 per month.

roughly 6.7 one-hundredths of a cent per kWh for electricity. Again, assuming a consumption of 9,000 kWh per year, this results in an annual bill increase of about \$6.00, or roughly 50 cents a month.

Clearly, the costs of generating 125 percent and 150 percent of the 1986 LIHEAP appropriation (1995\$) from the residential class alone fall somewhere in between. The precise costs for these two scenarios are set forth in Tables 11B and 11C respectively.

Allocating Costs to Residential, Commercial and Industrial Customers: Natural Gas and Electric

A wires charge designed to generate 100 percent of the 1986 LIHEAP appropriation in Oklahoma (1995\$) imposed on the combined residential, commercial and industrial customer base would result in a price increase of the following for natural gas and electric residential fuel users in Oklahoma:

roughly three tenths of a cent per CCF for natural gas users. Assuming a consumption of roughly 1,100 CCF per year, this results in an annual bill increase of roughly \$3.30, or about 27 cents per month for the average residential consumer.

roughly 1.0 one-hundredths of a cent per kWh for electricity users. Assuming a consumption of 9,000 kWh per year, this results in an annual bill increase of \$0.90, or roughly eight cents per month for the average residential customer.

In contrast, a wires charge designed to generate 200 percent of the 1986 LIHEAP appropriation in Oklahoma (1995\$) imposed on the combined residential, industrial and commercial classes would result in a price increase of the following for residential natural gas and electricity users in Oklahoma:

roughly 6.0 cents per CCF for natural gas users. Assuming an annual consumption of roughly 1,100 CCF, this results in an annual bill increase of roughly \$6.55, or about \$0.55 per month for the average residential customer.

roughly two one-hundredths of a cent per kWh for electricity. Assuming a consumption of 9,000 kWh per year, this results in an annual bill increase of about \$1.80, or about 15 cents a month for the average residential consumer.

Clearly, the costs of generating 125 percent and 150 percent of the LIHEAP appropriation from the combined residential, commercial and industrial classes fall somewhere in between. The precise costs for these latter two scenarios are set forth in Tables 12B and 12C respectively.

Allocating Costs only to Electric Consumption

A wires charge designed to generate 100 percent of the 1986 LIHEAP appropriation in Oklahoma (1995\$) imposed only on electric consumption would result in a price increase of the following for residential electric users in Oklahoma:

roughly two one-hundredths of one cent per kWh if spread over all electric classes (residential, commercial, industrial). Assuming an annual consumption of roughly 9000 kWh, this results in an annual bill increase of roughly \$1.71, or about 14 cents per month.

roughly five one-hundredths of a cent per kWh if spread over only residential consumption. Assuming a consumption of 9,000 kWh per year, this results in an annual bill increase of \$4.41 or about 37 cents per month.

In contrast, a wires charge designed to generate 200 percent of the 1986 LIHEAP appropriation in Oklahoma (1995\$) imposed only on electric consumption would result in a price increase of the following for residential electric users in Oklahoma:

roughly 3.9 one-hundredths of one cent per kWh if spread over all electric classes (residential, commercial, industrial). Assuming an annual consumption of roughly 9000 kWh, this results in an annual bill increase of roughly \$3.51, or about 29 cents per month.

roughly 99 one-hundredths of a cent per kWh for electricity. Again, assuming a consumption of 9,000 kWh per year, this results in an annual bill increase of about \$8.91, or roughly \$0.74 a month.

Clearly, the costs of generating 125 percent and 150 percent of the 1986 LIHEAP appropriation (1995\$) from electricity consumption alone fall somewhere in between. The precise costs for these two scenarios are set forth in Tables 13B and 13C respectively.

In addition, however, this analysis examines the impact of generating only 50 percent of the 1986 LIHEAP appropriation for Oklahoma (1995\$). A wires charge designed to generate 50 percent of that appropriation imposed only on electric consumption would result in a price increase of the following for residential electric users in Oklahoma:

roughly 1.6 one-hundredths of one cent per kWh if spread over all electric classes (residential, commercial, industrial). Assuming a consumption of roughly 9000 kWh per year, this results in an annual bill increase of roughly \$1.44, or about 12 cents per month.

roughly 5.7 one-hundredths of a cent per kWh for electricity. Again, assuming a consumption of 9,000 kWh per year, this results in an annual bill increase of about \$5.13, or roughly 43 cents a month.

This analysis of the 50% scenario is set forth in Table 13E. This Table considers costs for a residential only scenario as well as for a scenario involving combined residential, industrial and commercial consumption.

Allocating Costs Only to Residential Customers: All Fuels

A wires charge designed to generate 100 percent of the 1986 LIHEAP appropriation in Oklahoma (1995\$) imposed only on the residential customer class (all fuels) would result in a price increase of the following for natural gas and electric users in Oklahoma:^{122\}

roughly one-tenth cent per CCF for natural gas users. Assuming a consumption of roughly 1,100 CCF per year, this results in an annual bill increase of roughly \$10.86, or about \$0.90 per month.

roughly 13 one-hundredths of a cent per kWh for electricity users. Assuming a consumption of 9,000 kWh per year, this results in an annual bill increase of \$1.17, or about 10 cents per month.

In contrast, a wires charge designed to generate 200 percent of the 1986 LIHEAP appropriation in Oklahoma (1995\$) imposed only on the residential class (all fuels) would result in a price increase of the following for natural gas and electricity in Oklahoma:

^{122\}Other price impacts are set forth in the corresponding Tables below.

roughly two cents per CCF for natural gas users. Again, assuming an annual consumption of roughly 1,100 CCF, this results in an annual bill increase of roughly \$21.71, or about \$1.81 per month.

roughly seven one-hundredths of a cent per kWh for electricity. Again, assuming a consumption of 9,000 kWh per year, this results in an annual bill increase of about \$5.94, or roughly \$0.50 a month.

Clearly, the costs of generating 125 percent and 150 percent of the 1986 LIHEAP appropriation (1995\$) from the residential class alone fall somewhere in between. The precise costs for these two scenarios are set forth in Tables 14B and 14C respectively.

Allocating Costs to Residential, Commercial and Industrial Customers (All Fuels)

A wires charge designed to generate 100 percent of the 1986 LIHEAP appropriation in Oklahoma (1995\$) imposed on the combined residential, commercial and industrial customer base (all fuels) would result in a price increase of the following for natural gas and electric residential fuel users in Oklahoma:¹²³⁾

roughly 2.8 tenths of a cent per CCF for natural gas users. Assuming a consumption of roughly 1,100 CCF per year, this results in an annual bill increase of roughly \$3.14, or about 26 cents per month for the average residential consumer.

roughly one one-hundredth of a cent per kWh for electricity users. Assuming a consumption of 9,000 kWh per year, this results in an annual bill increase of \$0.90, or about eight cents per month for the average residential customer.

In contrast, a wires charge designed to generate 200 percent of the 1986 LIHEAP appropriation in Oklahoma (1995\$) imposed on the combined residential, industrial and commercial classes would result in a price increase of the following for residential natural gas and electricity users in Oklahoma:

roughly six tenths of one cent per CCF for natural gas users. Assuming an annual consumption of roughly 1,100 CCF, this results in an annual bill increase of roughly \$6.28, or about \$0.52 per month for the average residential customer.

roughly two hundredths of a cent per kWh for electricity. Assuming a consumption of 9,000 kWh per year, this results in an annual bill increase of about \$1.71, or roughly 14 cents a month for the average residential consumer.

¹²³⁾Price impacts for bulk fuels are set forth in the corresponding Tables below.

Clearly, the costs of generating 125 percent and 150 percent of the LIHEAP appropriation from the combined residential, commercial and industrial classes fall somewhere in between. The precise costs for these latter two scenarios are set forth in Tables 15B and 15C respectively.

A PROPOSED STRUCTURE FOR AN OKLAHOMA WIRES CHARGE

A proposed structure for an Oklahoma wires charge to fund low-income programs should address five issues:

- (1)What benefits should the wires charge pay for;
- (2)Who should bear the cost of the wires charge;
- (3)What should the value of the wires charge be;
- (4)How can the wires charge be made immune to bypass; and
- (5)Who should collect and distribute the wires charge.

What Benefits Should the Wires Charge Pay For

For all of the reasons discussed in the first section of this paper, a wires charge should be developed to pay for: (a) basic cash fuel assistance; (b) crisis intervention assistance; and (c) energy efficiency programs.

Energy efficiency programs should include not only direct investment programs involving partnerships with local Community Action Agencies (or other WAP sub-grantees),^{124\} they should include innovative partnerships involving housing,^{125\} financial institutions,^{126\} community development financial institutions,^{127\} and other public and private housing programs.^{128\}

^{124\}See e.g., Colton (1994). *Energy Efficiency and the Low-Income Consumer: Planning, Designing and Financing*, Fisher, Sheehan & Colton, Public Finance and General Economics: Belmont, MA; Colton (1994). *Securitizing Utility Avoided Costs: Creating an Energy Efficiency "Product" for Private Investment in WAP*, Fisher, Sheehan & Colton, Public Finance and General Economics: Belmont, MA.

^{125\}See e.g., Colton (1995). *Funding Minority and Low-Income Energy Efficiency Programs in a Competitive Electric Industry*, Fisher, Sheehan & Colton, Public Finance and General Economics: Belmont, MA.

^{126\}See e.g., Colton (1995). *Energy Efficiency as a Credit Enhancement: Public Utilities and the Affordability of First-Time Homeownership*, Fisher, Sheehan & Colton, Public Finance and General Economics: Belmont, MA.

^{127\}See e.g., Colton and Sheehan (1994). *"Linked Deposits" as a Utility Investment in Energy Efficiency for Low-Income Housing*, Fisher, Sheehan & Colton, Public Finance and General Economics: Belmont, MA.

^{128\}See e.g., Colton (1996). *Changing Paradigms for Delivering Energy Efficiency to the Low-Income Consumer by Competitive Utilities: The Need for a Shelter-Based Approach*, Fisher, Sheehan & Colton, Public Finance and General Economics: Belmont, MA.

The Value of the Wires Charge

The value of the wires charge to be collected should be based on the total amount of funds desired by the state. The cost per Btu, and thus the per unit of energy charge, should flow from this broader decision. Hence, for example, the state should decide whether it wishes to generate funding at 100 percent, 125 percent, 150 percent or 200 percent of LIHEAP levels, rather than deciding whether to increase rates by 1.0%, 1.5% or some other factor. One difficulty with increasing rates by a uniform percentage is the inherent unfairness of the distribution of the levy. As shown by the Tables discussed above, a one percent increase in natural gas rates is not equal in burden to a one percent increase in electric rates on a per unit of energy basis. Moreover, it seems most reasonable to decide what end result is desired before addressing the mechanism (*i.e.*, the per unit of energy charge) to be used to achieve that result.

This is not to say, of course, that the final dollar figure desired should not always be tempered by the impact which such fundraising has on rates. It is merely to state that the state should have an end-in-view as to total dollars desired before beginning the cost allocation process.

The value of the wires charge depends upon several underlying decisions. The first issue was addressed above. The wires charge should be sufficient to generate funds for: (a) basic cash fuel assistance; (b) crisis intervention grants; and (c) energy efficiency programs.

The Value of Cash Fuel Assistance: Basic Grants and Crisis Intervention

The amount of money needed to provide basic cash fuel assistance grants, as well as crisis intervention, depends upon four factors.

oDefining the "energy bill" to be covered: For all of the reasons outlined in the first section of this paper, a wires charge should be designed to address both heating and non-heating components of low-income bills. This focus supplants and replaces the current focus on heating bills with a new focus on total home energy bills (excluding transportation).

oDefining "low-income": The state must next define what it means by "low-income." Historically, the cap for LIHEAP participation has been established by federal statute as being either 150 percent of the federal Poverty Level *or* 60 percent of median income, at the state's discretion. In contrast, most HUD programs define "low-income" as extending up to 80 percent of median income. Table 14 below presents statewide figures on how this decision affects the number of families^{129\} deemed to be "low-income" in Oklahoma. Based on the historical inadequacy of 150

^{129\}"Families" and "households" are not synonymous.

percent of Poverty as an indicator of inability-to-pay,³⁰⁾ our recommendation is that "low-income" be set at 200 percent of the federal Poverty Level.

oMaking assumptions as to participation levels: The third decision which goes into making a determination of how much money to raise through a wires charge involves the participation rate from amongst the eligible population. Nationwide, LIHEAP participation rates range from roughly 20 percent to roughly 40 percent of the eligible population. An assumed participation rate of 30 to 35 percent in low-income fuel assistance programs funded through an Oklahoma wires charge would not be unreasonable.

oTargeting assistance: The final decision that goes into making a determination of how much money to raise through a wires charge in Oklahoma involves the decision rule for targeting assistance. The most commonly used benchmark is to establish lowering low-income energy burdens (*i.e.*, energy bills as a percent of income) to the total population average as the "ideal." This goal, however, often involves expenditures beyond a magnitude that would be politically acceptable. Lowering total energy burdens to a range of 10 - 12 percent allows for reasonable success in making payments by low-income households while staying within reasonable budgetary constraints.³¹⁾

As part of the decision on how much money to raise through a wires charge, it would be appropriate, also, to establish a cap on administrative expenses for both the fuel assistance and energy efficiency components of the program. A cap based on existing LIHEAP statutory restrictions (10 percent) is not unreasonable.

The Value of Low-Income Energy Efficiency Assistance

The low-income energy efficiency program funded through a wires charge should involve both adequate scope and funding. Adequate "scope" of the low-income energy efficiency program means that the state should seek to serve a wide-range of low-income constituencies. Adequate "funding" means that the low-income energy efficiency budget should increase until the program exhausts the available cost-effective measures, or until it exhausts the institutional capacity to deliver cost-effective measures, whichever comes first.

Determining the funding of low-income energy efficiency programs presents somewhat of a problem. While, in theory, a program should continue to fund energy efficiency measures until the marginal

³⁰⁾While not having space to document the discussions in the literature, it should be noted that 150 percent of Poverty does not reach many of the "working poor" who do not qualify for public assistance, but who nonetheless lack the financial ability to pay ongoing household expenses. In addition, many Social Security recipients also fall over (not far over, but nevertheless over) the 150 percent of Poverty Level ceiling.

³¹⁾It would be reasonable, also, to vary the target energy burden by household size. Ten percent of income is more important to a household with eight persons than it is to a household with two persons.

costs of those measures equal the marginal benefits, in reality, no such "full" funding is ever provided. In light of this, there seems to be no principled basis upon which to set a low-income energy efficiency budget. Why should the State of Oklahoma, in other words, spend \$8.0 million a year and not \$9.0 million? Why should the State serve 5,000 households rather than 6,000 households?

One principle does seem appropriate to guide low-income energy efficiency funding decisions. The extent of low-income energy efficiency funding should be sufficient to ensure that there are no lost opportunities in any given year. Lost opportunities arise when the accomplishment of some given task precludes the future accomplishment of additional work at that same dwelling. Some of the lost opportunities involved with existing programs include:

WAP weatherization: To the extent that WAP invests \$1,800 in a home that has the potential for \$3,000 of cost-effective conservation, there is a lost opportunity. It is highly unlikely that the home will be revisited to subsequently "finish" the remaining \$1,200 of conservation improvements. Moreover, federal regulations generally prohibit WAP from retrofitting a home in which WAP dollars have previously been invested.

Low-income housing developments: Decisions made by low-income housing developers represent decisions that will hold for the useful life of the measures. Accordingly, if a developer installs a relatively inefficient furnace or hot water heater, or fails to install the most cost-effective level of insulation, it is not likely that the state or a utility will soon revisit that home to install more energy efficient measures. The opportunity to install high efficiency measures is lost at the time of the developer's initial decision.

Unused institutional capacity: Assume the institutional capacity of low-income service providers is 8,000 homes per year in Oklahoma. These service providers might include local contractors, CAAs, CDCs and other profit or non-profit institutions. If the combined budget of low-income programs funds only 6,000 homes a year, there is a lost opportunity to increase the energy efficiency in 2,000 homes. By assumption, the maximum capacity is 8,000 homes per year. That capacity thus cannot be pushed to 10,000 for a year to "make-up" the earlier lost opportunity.

The institutional capacity for delivering low-income energy efficiency, of course, should include the capacity of the state's utilities in addition to the private non-utility contractors.

As can be seen, one component of a low-income energy efficiency program funded through a wires charge is a periodic inventory of the institutional capacity to deliver low-income energy efficiency measures. The inventory should cover the planning period of the non-profit agency administering the wires charge funds. If that agency develops three year energy efficiency plans, in other words, its inventory should include the existing and projected capacity to deliver low-income services over that three year period. The budget for low-income energy efficiency should thus be sufficient to finance full utilization of the inventoried capacity.¹³²⁾

¹³²⁾The non-profit agency which administers the wires charge then needs to make commitments to fully fund the institutional capacity over an announced

In sum, the upper limit on the budget for delivering low-income energy efficiency measures through an Oklahoma wires charge should be the point at which the marginal costs of such measures equal the marginal benefits. In reality, however, low-income programs rarely, if ever, spend to the margin. A substitute principle thus needs to be developed as a decision rule for the extent of low-income energy efficiency funding. The proposed decision rule is that funding through the wires charge¹³³⁾ should be of sufficient magnitude to ensure that there is no unused institutional capacity to deliver cost-effective low-income energy efficiency services. Stated another way, funding should be adequate such that no lost opportunities occur within the realm of low-income energy efficiency.

How to Make the Wires Charge Immune to Bypass

The recommendation inherent in this analysis is that a wires charge be imposed "at the meter." This recommendation stands in contrast to some recommendations that propose to impose the wires charge at the provider level. The primary goal of such proposals, it appears, is to try to force responsibility for some portion of the wires charge back on the shareholders, as competitive energy providers choose not to pass on the charge in retail rates. That goal, standing alone, represents an insufficient reason to impose a wires charge at the provider level.

Moreover, full responsibility for a wires charge should not be subject to bypass, in whole or in part, by a customer switching fuels. For this reason, the wires charge should not be imposed on a flat percentage of revenue (or a flat per unit of energy charge) basis. As the Tables discussed above show, imposing the wires charge on a per Btu basis is not only "equitable" in that it assigns cost responsibility based on the proportion of fuel consumed, it creates the situation where a customer switching from one fuel to another does not change the proportionate responsibility he or she bears as a user of that fuel.

Proposals for a flat per customer charge are somewhat summarily rejected. Under such a scheme, each unit in a 50-unit multi-family building that is individually metered (50 customers) would pay the same wires charge as the entire 50-unit building which is master-metered (one customer). There is little equity in such a proposal.

How to Make the Wires Charge Competitively Neutral

The proposed wires charge for Oklahoma is competitively neutral. In this sense, the term "competitively neutral" means that the imposition of the wires charge does not change the competitive position of fuels that would otherwise exist in the absence of such a charge. This competitive neutrality is enforced by imposing the wires charge on a per Btu basis. As a result, there is no greater or lesser incentive to purchase one fuel rather than another because of the wires charge.

(. . continued)

time frame. This type of commitment is necessary for low-income service providers to plan and develop their own capacity.

¹³³⁾ Combined with WAP and other sources of revenues.

Nor is there any incentive to purchase from one supplier rather than another (within the same type) as a result of the wires charge.

Who Should Collect and Distribute the Wires Charge

A wires charge should be collected through, and distributed by, a private non-profit agency modelled after an institution such as the Colorado Energy Assistance Foundation. Such an institution is a private, non-profit agency with an independent Board of Directors, who is subject to the additional oversight of a publicly accountable commission.

The Colorado Energy Assistance Foundation (CEAF) is a non-profit fundraising organization under the direction of the Colorado Commission for Low-Income Energy Assistance created by Governor Romer in 1988. In turn, in 1989, that Commission created CEAF, which was designed to bridge the gap between the growing need for heating assistance statewide and the decreasing availability of federal funds. In addition to its own Board of Directors, therefore, CEAF is subject to oversight by the Commission which consists of gubernatorial appointments from the various stakeholders in low-income assistance. Representatives of public and private utilities, relevant state agencies, and community-based organizations sit on the Commission.

Unlike a private non-profit agency organized to administer a wires charge fund, as a public/private partnership, CEAF's fundraising involves regulated and non-regulated energy providers, the public, and both the state and federal governments. CEAF's fundraising involves legislation, customer contributions, special requests during utility refunds, company matching programs, the Combined Federal Campaign, investment and interest earnings, events, corporate contributions, and settlement agreements. Nonetheless, CEAF awards an annual contribution to the state LIHEAP agency for winter energy assistance as well as for approved special projects.

Oversight of the private non-profit organization can be modelled after the oversight of the universal service fund created for telephone service in Illinois. The Illinois Telephone Assistance Program was created by state law and is based on voluntary contributions to fund assistance to low-income families who need basic local phone service. UTAC is the non-profit organization comprised of phone company and consumer, as well as low-income, representatives and created under direction of the Illinois State Commerce Commission to administer the new telephone assistance program.

Beginning February 1, 1993, inserts were included in Illinois phone bills soliciting contributions for UTAC. After the first nine months of the program (September 1993), and every six months thereafter, UTAC files a petition with the Illinois Commerce Commission asking the Commission to determine the type and amount of assistance, if any, that can be provided to eligible consumers. Depending on the amount of the fund, the Commission, after hearings, will order that the fund be used to provide additional assistance on installation, assistance on the customer's monthly bill, or both.

In a similar fashion, oversight of a wires charge non-profit should rest with a state commission created along the lines of the Colorado Commission for Low-Income Energy Assistance.

Jurisdiction should not rest with the Oklahoma Corporation Commission, since that Commission does not have experience in dealing with bulk fuels or fuel assistance generally. Nor should the wires charge be subject to the jurisdiction of either the state LIHEAP office or the state WAP office, since neither of those agencies has authority over --nor does it make sense to grant them authority over-- *both* low-income fuel assistance and energy efficiency programs.

A third model of the type of public oversight possible for such a public commission lies with the Oregon Oil Heat Commission. In 1989, the Oregon General Assembly created the Oil Heat Commission (OHC). The purposes of the OHC are, *inter alia*, to generate funds for low-income energy efficiency improvements. More specifically, the legislature said the OHC could provide:

1. * * *;

2. For programs to encourage energy conservation among oil heat users through home weatherization and through developing and disseminating educational materials regarding energy conservation. * * *

3. For programs to encourage energy conservation among oil heat users through the use of energy efficient oil heat equipment.

4. For programs to offer financial assistance to low-income oil heat users to help defray the cost of fuel, modern equipment installation and weatherization expenses.^{134\}

The Oregon OHC is financed through an assessment on each "oil marketer"^{135\} based on the "gross revenue derived from the business of being an oil marketer."^{136\} The revenue collected is limited so that it "will not substantially exceed the amount of the estimated expenditures stated in the final budget prepared by the commission."^{137\}

In sum, the recommended public commission to oversee a private non-profit wires charge organization would *not* be designed to develop detailed work plans for distribution of the wires charge funds. Instead, the commission would be charged with accomplishing three tasks:

o Providing direction on the general division of revenue between basic cash assistance, crisis intervention, and energy efficiency improvements;

^{134\}ORS, §469.230.

^{135\}"Oil marketer" was defined as "a person who supplies heating oil at retail in this state." ORS, 469.228((6). "Heating oil" was defined as "number 1 or 2 heating oil that is delivered to a tank and used to create heat."

^{136\}ORS, 469.254.

^{137\}ORS, §469.254(3).

oApproving, after hearing, a proposed annual work plan developed and submitted by the private non-profit agency administering the funds; and

oProviding oversight such that the revenue collected will not substantially exceed the amount of the estimated expenditures stated in the final work plan approved by the commission.

Finally, the most reasonable means of local distribution of all types of assistance (basic cash grants, crisis intervention, and energy efficiency) would seem to be through existing LIHEAP and WAP distribution networks. In addition, however, the private non-profit and the commission should consider whether it is reasonable to expand the delivery network for crisis intervention beyond the existing LIHEAP sub-grantees.

Creation of a State Leveraging Incentive Fund

As part of the process of establishing a wires charge, the state legislature should create and fund a state leveraging incentive fund akin to the LIHEAP leveraging incentive fund created at the national level. This incentive fund would encourage local communities to bring local resources to bear on low-income energy affordability issues. Whether through energy efficiency programs through volunteer house repairs,¹³⁸⁾ crisis assistance initiatives such as utility fuel funds, or some other mechanisms), the state should commit to encouraging (and rewarding) local initiatives.¹³⁹⁾

SUMMARY AND CONCLUSIONS

For all of the reasons outlined in this paper, a wires charge is a necessary and appropriate public policy response for low-income households in Oklahoma. A summary of the various decisions that might comprise the design of an Oklahoma wires charge is set forth in Appendix A below.

¹³⁸⁾The "Florida Fix" program coordinated and promoted by the Florida Housing Coalition (Tallahassee) is an excellent example of such a volunteer partnership. Florida Fix involves local groups of volunteers working to repair low-income housing.

¹³⁹⁾A broad ranging discussion of state and local fundraising initiatives can be found at Colton (1996). *Funding Fuel Assistance: State and Local Strategies to Help Pay Low-Income Home Energy Bills*, Fisher, Sheehan & Colton, Public Finance and General Economics: Belmont, MA. A listing of the programs described in that publication is attached as Appendix C.

**APPENDIX A:
SUMMARY OF RECOMMENDATIONS
STRUCTURE OF WIRES CHARGE IN OKLAHOMA**

1.A WIRES CHARGE SHOULD FUND TWO COMPONENTS OF LOW-INCOME ASSISTANCE.

- a.Cash fuel assistance.
- b.Energy efficiency assistance.

2.WHO PAYS FOR THE WIRES CHARGE.

- a.All customer classes (residential, industrial, commercial) should pay the wires charge.
- b.The "wires charge" should be imposed on all fuel sources.
 - i.Natural gas, electricity, propane, fuel oil, propane.
 - ii.The responsibility should be apportioned in proportion to usage of each fuel.

3.THE VALUE OF A WIRES CHARGE SHOULD CONSIDER THREE FACTORS.

- a.A "wires charge" should include a component for both:
 - i.Fuel assistance
 - (1)Define who is poor;
 - (2)Determine percent who will participate;
 - (3)Targeting assistance: affordable percentage of income.
 - ii.Energy efficiency.
 - (1)Exhaust the institutional capacity;
 - (2)Eliminate lost opportunities.

**APPENDIX A:
SUMMARY OF RECOMMENDATIONS
STRUCTURE OF WIRES CHARGE IN OKLAHOMA**

b.A "wires charge" should fund assistance directed toward total home energy bills, including non-heat electric, not simply home heating.

c. There should be an administrative dollar cap.

4. HOW TO MAKE THE WIRES CHARGE NON-BYPASSABLE.

a. Impose the wires charge "at the meter," not at the provider level.

b. The charge should be calculated on a per Btu basis.

i. Not a flat percentage basis.

ii. Not on a flat per customer basis.

5. WHO COLLECTS AND DISTRIBUTES THE WIRES CHARGE.

a. The wires charge revenue should be distributed through a statewide private non-profit organization.

i. Similar to existing institutions:

(1) Colorado Energy Assistance Foundation

(2) Universal Telephone Access Corporation (Illinois)

(3) Oregon Oil Heat Commission

b. The non-profit should be overseen by a publicly-accountable agency.

i. Again, similar to Colorado Energy Assistance Foundation, Universal Telephone Access Corporation (Illinois), Oregon Oil Heat Commission.

c. Distribute through existing networks.

i. LIHEAP network for cash fuel assistance.

(1) May consider expanding distribution network for crisis assistance to crisis providers in addition to LIHEAP sub-grantees.

ii. WAP network for energy efficiency investments.

**APPENDIX A:
SUMMARY OF RECOMMENDATIONS
STRUCTURE OF WIRES CHARGE IN OKLAHOMA**

6.MISCELLANEOUS "OTHER" ISSUES.

a. There should be a state-funded leveraging incentive fund.

i. Akin to federal LIHEAP leveraging incentive fund.

APPENDIX B:
OKLAHOMA WIRES CHARGE DATA AND TABLES

| TABLE 1: AVERAGE WINTER NATURAL GAS HEATING BURDENS VARIOUS OKLAHOMA LOW-INCOME POPULATIONS WINTER 1990 - 1991 | | | |
|---|-----------------------|-------------------------|------------------------|
| | Average Winter Income | Average Winter Gas Bill | Bill as Income Percent |
| LIHEAP Recipients | \$1,340 | \$181.25 | 13.5% |
| AFDC Recipients | \$1,023 | \$181.25 | 17.7% |
| SSI Recipients | \$1,413 | \$181.25 | 12.8% |
| Social Security: | \$1,724 | \$181.25 | 10.5% |

**APPENDIX B:
OKLAHOMA WIRES CHARGE DATA AND TABLES**

| TABLE 2: WINTER GAS BILL AS PERCENTAGE OF INCOME: LIHEAP RECIPIENTS BY INCOME RANGE WINTER 1990 - 1991 | | | | | | | | | |
|---|------------------------------------|---------------------|---------------------|---------------------|---------------------|---------------------|-----------------------|-----------------------|---------------------|
| | AVERAGE WINTER NATURAL GAS BILL | INCOME \$0-1,999 | INCOME \$2-3,999 | INCOME \$4-5,999 | INCOME \$6-7,999 | INCOME \$8-9,999 | INCOME \$10-11,999 | INCOME \$12-14,999 | INCOME \$15,000+ |
| Oklahoma | \$181.25 | 72.5% | 24.2% | 14.5% | 10.4% | 8.1% | 6.6% | 5.4% | 4.8% |

**APPENDIX B:
OKLAHOMA WIRES CHARGE DATA AND TABLES**

| <p align="center">TABLE 3: NUMBER OF LIHEAP RECIPIENTS BY INCOME RANGE WINTER 1990 - 1991</p> | | | | | | | | | |
|--|--|-----------------------------|-----------------------------|-----------------------------|------------------------------|-----------------------------|-------------------------------|-------------------------------|-----------------------------|
| | TOTAL STATE LIHEAP RECIPIENTS | INCOME \$0-1,999 | INCOME \$2-3,999 | INCOME \$4-5,999 | INCOME \$6,-7,999 | INCOME \$8-9,999 | INCOME \$10-11,999 | INCOME \$12-14,999 | INCOME \$15,000+ |
| Oklahoma | 86,447 | 10,460 | 12,535 | 38,988 | 9,941 | 8,472 | 3,285 | 1,988 | 778 |

**APPENDIX B:
OKLAHOMA WIRES CHARGE DATA AND TABLES**

| TABLE 4: HEATING USAGE AS PERCENT OF TOTAL HOME ENERGY USAGE AND HEATING BILLS AS PERCENTAGE OF TOTAL HOME ENERGY BILLS NATIONAL DATA | | | | | | |
|--|---------------|---------|---------|----------------|---------|---------|
| | Usage (mmBtu) | | | Bills (\$\$\$) | | |
| | Total | Heating | Percent | Total | Heating | Percent |
| All Households | 103.9 | 56.5 | 54.4% | \$1,255 | \$406 | 32.4% |
| Low-Income Households | 90.9 | 50.6 | 55.7% | \$1,062 | \$364 | 34.3% |
| LIHEAP Recipients | 98.7 | 59.9 | 60.7% | \$1,067 | \$412 | 38.6% |
| SOURCE: | | | | | | |
| Low-Income Home Energy Assistance Program Report to Congress for FY 1993, at 17 and 20 (Oct. 1994). | | | | | | |

**APPENDIX B:
OKLAHOMA WIRES CHARGE DATA AND TABLES**

**TABLE 5:
UTILITY-BY-UTILITY
SUMMER ELECTRIC BILL (500 KWH)
AS PERCENT OF INCOME, PUBLIC ASSISTANCE RECIPIENTS**

| State | Utility | Largest City Served | (June-Aug) Typical Bill | Avg Summer Public Assistance Income | Avg Summer Bill as Pct of Avg Income | No. of Public Assistance HHs in Largest Community |
|--------------|--------------------------------|----------------------------|--|--|---|--|
| Oklahoma | Oklahoma Gas & Electric | Oklahoma City | \$249.12 | \$834 | 29.9% | 11,758 |
| | Public Service Co. of Oklahoma | Tulsa | \$208.68 | \$806 | 25.9% | 9,093 |

SOURCE:

Colton, *The Other Part of the Year: Low-Income Households and their Need for Cooling, A State-by-State Analysis of Low-Income Summer Electric Bills* (1995).

**APPENDIX B:
OKLAHOMA WIRES CHARGE DATA AND TABLES**

TABLE 6:
UNITS OF HOUSING AFFORDABLE AT DIFFERENT LEVELS OF HUD-ADJUSTED MEDIAN FAMILY INCOME (HAMFI)
BY YEAR OF CONSTRUCTION

| Year of Construction | 0 - 30% Median Income | | | 31 - 50% Median Income | | | 51 - 80% Median Income | | |
|----------------------|-----------------------|--------|--------|------------------------|--------|---------|------------------------|---------|---------|
| | Renter | Owner | Total | Renter | Owner | Total | Renter | Owner | Total |
| Before 1940 | 11,249 | 30,753 | 42,002 | 15,796 | 24,838 | 40,634 | 12,056 | 25,154 | 37,210 |
| 1940 - 1949 | 7,280 | 17,263 | 24,543 | 50,039 | 20,561 | 70,600 | 12,089 | 21,962 | 34,051 |
| 1950 - 1959 | 8,984 | 19,952 | 28,936 | 17,608 | 31,929 | 49,537 | 21,394 | 48,138 | 69,532 |
| 1960 - 1979 | 29,363 | 48,856 | 78,219 | 55,270 | 46,087 | 101,357 | 69,140 | 115,328 | 184,468 |
| 1980 - 1990 | 12,394 | 26,636 | 39,030 | 22,476 | 19,217 | 41,693 | 46,283 | 48,458 | 94,741 |

Source: CHAS Data Base: HUD: 1990

**APPENDIX B:
OKLAHOMA WIRES CHARGE DATA AND TABLES**

| TABLE 7: OKLAHOMA HOUSING AFFORDABILITY AT DIFFERENT LEVELS OF HUD-ADJUSTED MEDIAN FAMILY INCOME | | | | | | |
|---|----------------------|--------|---------|----------------------|--------|--------|
| Income Range | Housing Burden > 30% | | | Housing Burden > 50% | | |
| | Renter | Owner | Total | Renter | Owner | Total |
| 0 - 30% HAMFI | 61,655 | 43,404 | 105,059 | 48,792 | 27,682 | 76,474 |
| 51 - 50% HAMFI | 42,546 | 31,007 | 73,553 | 11,727 | 12,041 | 23,768 |
| 51 - 80% HAMFI | 22,262 | 31,476 | 53,738 | 1,770 | 6,938 | 8,708 |
| Source: CHAS Data Base: HUD: 1990 | | | | | | |

**APPENDIX B:
OKLAHOMA WIRES CHARGE DATA AND TABLES**

| TABLE 8: CONTRIBUTION OF UTILITY COSTS TO TOTAL SHELTER COSTS: SELECTED OKLAHOMA CITIES | | | | | | | | |
|--|---------------|---------|---|-------------|-------|-------|------------------------------------|--|
| State | City | FMR /a/ | Monthly Winter Utility Bills for Selected Oklahoma Cities | | | | Monthly Winter Utility Bill /b/ | Percent of FMR Devoted to Utilities |
| | | | Natural Gas | Electricity | Water | Sewer | | |
| Oklahoma | Oklahoma City | \$419 | \$76 | \$61 | \$13 | \$17 | \$167 | 40% |
| Oklahoma | Tulsa | \$485 | \$76 | \$50 | \$13 | \$14 | \$153 | 32% |

NOTES:

/a/Fair Market Rents (FMRs) include contract rent plus all utilities. Determined and published by HUD on annual basis.

/b/May have minor differences from sum of individual columns due to rounding.

SOURCES:

Natural Gas:NARUC annual winter natural gas bill survey.
 Electricity:NARUC annual winter electric bill survey.
 Water:Ernst and Young annual water bill survey.
 Sewer:Ernst and Young annual sewer bill survey.

**APPENDIX B:
OKLAHOMA WIRES CHARGE DATA AND TABLES**

| TABLE 9: UNITS OF HOUSING AFFORDABLE AT DIFFERENT LEVELS OF HUD-ADJUSTED MEDIAN FAMILY INCOME WITH PHYSICAL PROBLEMS | | | | | | | | | |
|--|---------------|---------|---------|----------------|---------|---------|----------------|---------|---------|
| | 0 - 30% HAMFI | | | 31 - 50% HAMFI | | | 51 - 80% HAMFI | | |
| | Renter | Owner | Total | Renter | Owner | Total | Renter | Owner | Total |
| Total Units | 69,270 | 143,460 | 212,730 | 124,089 | 141,832 | 265,921 | 161,762 | 259,240 | 421,002 |
| Units With Physical Problems | 17,241 | 34,909 | 52,150 | 54,605 | 29,545 | 84,150 | 68,450 | 47,400 | 115,850 |

Source: CHAS Data Base: HUD: 1990

**APPENDIX B:
OKLAHOMA WIRES CHARGE DATA AND TABLES**

| TABLE 10: BILL PAYMENT IMPACT FOR CUSTOMERS WITH ARREARAGES: LIURP: PENNSYLVANIA | | | | | | |
|---|------------------------------------|-------------------------------------|------------------------------------|-------------------------------------|------------------------------------|-------------------------------------|
| 1992 LIURP | Heating Jobs | | Water Heating Jobs | | Baseload Jobs | |
| | Percent of Bill Paid Pre-Period | Percent of Bill Paid Post-Period | Percent of Bill Paid Pre-Period | Percent of Bill Paid Post-Period | Percent of Bill Paid Pre-Period | Percent of Bill Paid Post-Period |
| Duquesne | Not Applicable | | 91% | 100% | 78% | 106% |
| Met Ed | 78% | 107% | 79% | 107% | | |
| Pennelec | 92% | 95% | 96% | 99% | | |
| Penn Power | Not Applicable | | 95% | 93% | | |
| PP&L | 51% | 95% | 55% | 105% | | |
| PECO Electric | 74% | 118% | 78% | 109% | | |
| UGI Electric | 95% | 105% | Not Applicable | | | |
| West Penn | 126% | 102% | 129% | 106% | | |
| Columbia Gas | 69% | 133% | | | | |
| Equitable | Not Applicable | | | | | |
| NFG | 96% | 125% | | | | |
| PECO Gas | 68% | 133% | | | | |
| PG&W | 96% | 106% | | | | |
| Peoples | 99% | 106% | | | | |

**APPENDIX B:
OKLAHOMA WIRES CHARGE DATA AND TABLES**

| | | | | | | |
|---|---------------|------|--|--|--|--|
| T.W. Phillips | Not Available | | | | | |
| UGI Gas | 89% | 115% | | | | |
| SOURCE: Pennsylvania PUC Evaluation of 1992 LIURP Program Results (1995). | | | | | | |

**APPENDIX B:
OKLAHOMA WIRES CHARGE DATA AND TABLES**

| TABLE 11A: CHARGE NEEDED ON OKLAHOMA RESIDENTIAL CONSUMPTION TO GENERATE 100% OF 1986 LIHEAP APPROPRIATION (1995\$) | | | |
|---|--------------|----------------|--------------|
| Residential Only: 100% Scenario (\$24,384,514) | Natural Gas | Electricity | Total |
| Billion Btu Consumption | 80 | 168.8 | 248.8 |
| Fuel units | 78,000,000 | 49,469,000,000 | |
| Btu/fuel unit | 1,025,641 | 3,412 | |
| Dollars/btu | \$0.00000010 | \$0.00000010 | |
| Total dollars | \$7,840,680 | \$16,543,834 | \$24,384,514 |
| Price per fuel unit | \$0.10052 | \$0.00033 | |
| NOTES: | | | |
| Fuel units:Natural Gas = MCF | | | |
| Electricity = kWh | | | |

**APPENDIX B:
OKLAHOMA WIRES CHARGE DATA AND TABLES**

| TABLE 11B: CHARGE NEEDED ON OKLAHOMA RESIDENTIAL CONSUMPTION TO GENERATE 125% OF 1986 LIHEAP APPROPRIATION (1995\$) | | | |
|---|--------------|----------------|--------------|
| Residential Only: 125% Scenario (\$30,480,643) | Natural Gas | Electricity | Total |
| Billion Btu Consumption | 80 | 168.8 | 248.8 |
| Fuel units | 78,000,000 | 49,469,000,000 | |
| Btu/fuel unit | 1,025,641 | 3,412 | |
| Dollars/btu | \$0.00000012 | \$0.00000012 | |
| Total dollars | \$9,800,850 | \$20,679,793 | \$30,480,643 |
| Price per fuel unit | \$0.12565 | \$0.00042 | |
| NOTES: | | | |
| Fuel units:Natural Gas = MCF | | | |
| Electricity = kWh | | | |

**APPENDIX B:
OKLAHOMA WIRES CHARGE DATA AND TABLES**

| TABLE 11C: CHARGE NEEDED ON OKLAHOMA RESIDENTIAL CONSUMPTION TO GENERATE 150% OF 1986 LIHEAP APPROPRIATION (1995\$) | | | |
|---|--------------|----------------|--------------|
| Residential Only: 150% Scenario (\$36,576,771) | Natural Gas | Electricity | Total |
| Billion Btu Consumption | 80 | 168.8 | 248.8 |
| Fuel units | 78,000,000 | 49,469,000,000 | |
| Btu/fuel unit | 1,025,641 | 3,412 | |
| Dollars/btu | \$0.00000015 | \$0.00000015 | |
| Total dollars | \$11,761,020 | \$24,815,571 | \$36,576,771 |
| Price per fuel unit | \$0.15078 | \$0.00050 | |
| NOTES: | | | |
| Fuel units:Natural Gas = MCF | | | |
| Electricity = kWh | | | |

**APPENDIX B:
OKLAHOMA WIRES CHARGE DATA AND TABLES**

| TABLE 11D: CHARGE NEEDED ON OKLAHOMA RESIDENTIAL CONSUMPTION TO GENERATE 200% OF 1986 LIHEAP APPROPRIATION (1995\$) | | | |
|---|--------------|----------------|--------------|
| Residential Only: 200% Scenario (\$48,769,028) | Natural Gas | Electricity | Total |
| Billion Btu Consumption | 80 | 168.8 | 248.8 |
| Fuel units | 78,000,000 | 48,469,000,000 | |
| Btu/fuel unit | 1,025,641 | 3,412 | |
| Dollars/btu | \$0.00000020 | \$0.00000020 | |
| Total dollars | \$15,681,359 | \$33,087,669 | \$48,769,028 |
| Price per fuel unit | \$0.20104 | \$0.00067 | |
| NOTES: | | | |
| Fuel units:Natural Gas = MCF | | | |
| Electricity = kWh | | | |

**APPENDIX B:
OKLAHOMA WIRES CHARGE DATA AND TABLES**

| TABLE 12A: CHARGE NEEDED ON OKLAHOMA RESIDENTIAL, COMMERCIAL AND INDUSTRIAL CONSUMPTION TO GENERATE 100% OF 1986 LIHEAP APPROPRIATION (1995\$) | | | |
|--|---------------|-----------------|-------|
| Residential, Commercial, Industrial: 100% Scenario: (\$24,384,514) | Natural Gas | Electricity | Total |
| Billion Btu | 406.9 | 430.2 | 837.2 |
| Fuel units | 398,000,000 | 126,092,000,000 | |
| Btu/fuel unit | 1,022,362 | 3,412 | |
| Dollars/Btu | \$0.000000029 | \$0.000000029 | |
| Total dollars | \$11,852,895 | \$12,531,619 | |
| Price per fuel unit | \$0.02978 | \$0.00010 | |
| NOTES: | | | |
| Fuel Units:Natural Gas = MCF | | | |
| Electricity = kWh | | | |

**APPENDIX B:
OKLAHOMA WIRES CHARGE DATA AND TABLES**

| TABLE 12B: CHARGE NEEDED ON OKLAHOMA RESIDENTIAL, COMMERCIAL AND INDUSTRIAL CONSUMPTION TO GENERATE 125% OF 1986 LIHEAP APPROPRIATION (1995\$) | | | |
|--|---------------|-----------------|-------|
| Residential, Commercial, Industrial: 125% Scenario (\$30,480,643) | Natural Gas | Electricity | Total |
| Billion Btu | 406.9 | 430.2 | 837.1 |
| Fuel units | 398,000,000 | 126,092,000,000 | |
| Btu/fuel unit | 1,022,362 | 3,412 | |
| Dollars/Btu | \$0.000000037 | \$0.000000037 | |
| Total dollars | \$14,816,119 | \$15,664,523 | |
| Price per fuel unit | \$0.03723 | \$0.00012 | |
| NOTES: | | | |
| Fuel Units:Natural Gas = MCF | | | |
| Electricity = kWh | | | |

**APPENDIX B:
OKLAHOMA WIRES CHARGE DATA AND TABLES**

| TABLE 12C: CHARGE NEEDED ON OKLAHOMA RESIDENTIAL, COMMERCIAL AND INDUSTRIAL CONSUMPTION TO GENERATE 150% OF 1986 LIHEAP APPROPRIATION (1995\$) | | | |
|--|---------------|-----------------|-------|
| Residential, Commercial, Industrial: 150% Scenario (\$36,576,771) | Natural Gas | Electricity | Total |
| Billion Btu | 406.9 | 430.2 | 837.1 |
| Fuel units | 398,000,000 | 126,092,000,000 | |
| Btu/fuel unit | 1,022,362 | 3,412 | |
| Dollars/Btu | \$0.000000044 | \$0.000000044 | |
| Total dollars | \$17,779,343 | \$18,797,428 | |
| Price per fuel unit | \$0.04467 | \$0.00015 | |
| NOTES: | | | |
| Fuel Units:Natural Gas = MCF | | | |
| Electricity = kWh | | | |

**APPENDIX B:
OKLAHOMA WIRES CHARGE DATA AND TABLES**

| TABLE 12D: CHARGE NEEDED ON OKLAHOMA RESIDENTIAL, COMMERCIAL AND INDUSTRIAL CONSUMPTION TO GENERATE 200% OF 1986 LIHEAP APPROPRIATION (1995\$) | | | |
|--|---------------|-----------------|-------|
| Residential, Commercial, Industrial: 200% Scenario (\$48,769,028) | Natural Gas | Electricity | Total |
| Billion Btu | 406.9 | 430.2 | 837.1 |
| Fuel units | 398,000,000 | 126,092,000,000 | |
| Btu/fuel unit | 1,022,362 | 3,412 | |
| Dollars/Btu | \$0.000000058 | \$0.000000058 | |
| Total dollars | \$23,705,791 | \$25,063,237 | |
| Price per fuel unit | \$0.05956 | \$0.00020 | |
| NOTES: | | | |
| Fuel Units:Natural Gas = MCF | | | |
| Electricity = kWh | | | |

**APPENDIX B:
OKLAHOMA WIRES CHARGE DATA AND TABLES**

| TABLE 13A: CHARGE NEEDED ON OKLAHOMA ELECTRIC CONSUMPTION TO GENERATE 100% OF 1986 LIHEAP APPROPRIATION (1995\$) | | | |
|--|-----------------|------------------|--------------|
| 100% Scenario: \$24,384,514 | All Classes | Residential Only | Total |
| Billion Btu | 430.2 | 168.8 | \$24,384,514 |
| Fuel units | 126,092,000,000 | 49,469,000,000 | |
| Btu/fuel unit | 3,412 | 3,412 | |
| Dollars/Btu | \$0.000000057 | \$0.00000014 | |
| Total dollars | \$24,384,514 | \$24,384,514 | |
| Price per fuel unit | \$0.00019 | \$0.00049 | |
| NOTES: | | | |
| Fuel Unit:Electricity = kWh | | | |

**APPENDIX B:
OKLAHOMA WIRES CHARGE DATA AND TABLES**

| TABLE 13B: CHARGE NEEDED ON OKLAHOMA ELECTRIC CONSUMPTION TO GENERATE 125% OF 1986 LIHEAP APPROPRIATION (1995\$) | | | |
|--|-----------------|------------------|--------------|
| 125% Scenario: \$30,480,643 | All Classes | Residential Only | Total |
| Billion Btu Consumption | 430.2 | 168.8 | \$30,480,643 |
| Fuel units | 126,092,000,000 | 49,469,000,000 | |
| Btu/fuel unit | 3,412 | 3,412 | |
| Dollars/Btu | \$0.00000071 | \$0.00000018 | |
| Total dollars | \$30,480,643 | \$30,480,643 | |
| Price per fuel unit | \$0.00024 | \$0.00062 | |
| NOTES: | | | |
| Fuel Unit:Electricity = kWh | | | |

**APPENDIX B:
OKLAHOMA WIRES CHARGE DATA AND TABLES**

| TABLE 13C: CHARGE NEEDED ON OKLAHOMA ELECTRIC CONSUMPTION TO GENERATE 150% OF 1986 LIHEAP APPROPRIATION (1995\$) | | | |
|--|-----------------|------------------|--------------|
| 150% Scenario: \$36,576,771 | All Classes | Residential Only | Total |
| Billion Btu Consumption | 430.2 | 168.8 | \$36,576,771 |
| Fuel units | 126,092,000,000 | 49,469,000,000 | |
| Btu/fuel unit | 3,412 | 3,412 | |
| Dollars/Btu | \$0.000000085 | \$0.000000022 | |
| Total dollars | \$36,576,771 | \$36,576,771 | |
| Price per fuel unit | \$0.00029 | \$0.00074 | |
| NOTES: | | | |
| Fuel Unit:Electricity = kWh | | | |

**APPENDIX B:
OKLAHOMA WIRES CHARGE DATA AND TABLES**

| TABLE 13D: CHARGE NEEDED ON OKLAHOMA ELECTRIC CONSUMPTION TO GENERATE 200% OF 1986 LIHEAP APPROPRIATION (1995\$) | | | |
|--|-----------------|------------------|--------------|
| 200% Scenario: \$48,769,028 | All Classes | Residential Only | Total |
| Billion Btu Consumption | 430.2 | 168.8 | \$48,769,028 |
| Fuel units | 126,092,000,000 | 49,469,000,000 | |
| Btu/fuel unit | 3,412 | 3,412 | |
| Dollars/Btu | \$0.000000113 | \$0.00000029 | |
| Total dollars | \$48,769,028 | \$48,769,028 | |
| Price per fuel unit | \$0.00039 | \$0.00099 | |
| NOTES: | | | |
| Fuel Unit:Electricity = kWh | | | |

**APPENDIX B:
OKLAHOMA WIRES CHARGE DATA AND TABLES**

| TABLE 13E: CHARGE NEEDED ON OKLAHOMA ELECTRIC CONSUMPTION TO GENERATE 50% OF 1986 LIHEAP APPROPRIATION (1995\$) | | | |
|---|-----------------|------------------|--------------|
| 50% Scenario: \$74,716,961 | All Classes | Residential Only | Total |
| Billion Btu Consumption | 430.2 | 168.8 | \$74,716,961 |
| Fuel units | 462,070,000,000 | 130,507,000,000 | |
| Btu/fuel unit | 3,412 | 3,412 | |
| Dollars/Btu | \$0.000000047 | \$0.00000017 | |
| Total dollars | \$74,716,961 | \$74,716,961 | |
| Price per fuel unit | \$0.00016 | \$0.00057 | |
| NOTES: | | | |
| Fuel Unit:Electricity = kWh | | | |

**APPENDIX B:
OKLAHOMA WIRES CHARGE DATA AND TABLES**

TABLE 14A:
CHARGE NEEDED ON ALL RESIDENTIAL ENERGY CONSUMPTION (OKLAHOMA)

**APPENDIX B:
OKLAHOMA WIRES CHARGE DATA AND TABLES**

TO GENERATE 100% OF 1986 LIHEAP APPROPRIATION (1995\$)

**APPENDIX B:
OKLAHOMA WIRES CHARGE DATA AND TABLES**

| Residential Only: 100% Scenario (\$24,384,514) | Natural Gas | Electricity | Fuel Oil | Kerosene | LPG | Total |
|--|-------------|-------------|----------|----------|-----|-------|
| | | | | | | |

**APPENDIX B:
OKLAHOMA WIRES CHARGE DATA AND TABLES**

| | | | | | | |
|-------------|----|-------|---|---|-----|-------|
| Billion Btu | 80 | 168.8 | 0 | 0 | 4.6 | 253.4 |
|-------------|----|-------|---|---|-----|-------|

**APPENDIX B:
OKLAHOMA WIRES CHARGE DATA AND TABLES**

| | | | | | | |
|------------|------------|----------------|---|---|------------|--|
| Fuel units | 78,000,000 | 49,469,000,000 | 0 | 0 | 54,012,000 | |
|------------|------------|----------------|---|---|------------|--|

**APPENDIX B:
OKLAHOMA WIRES CHARGE DATA AND TABLES**

| | | | | | | |
|---------------|-----------|-------|---|---|--------|--|
| Btu/fuel unit | 1,025,641 | 3,412 | 0 | 0 | 85,155 | |
|---------------|-----------|-------|---|---|--------|--|

**APPENDIX B:
OKLAHOMA WIRES CHARGE DATA AND TABLES**

| | | | | | | |
|-------------|--------------|--------------|-----|-----|--------------|--|
| Dollars/Btu | \$0.00000010 | \$0.00000010 | \$0 | \$0 | \$0.00000010 | |
|-------------|--------------|--------------|-----|-----|--------------|--|

**APPENDIX B:
OKLAHOMA WIRES CHARGE DATA AND TABLES**

| | | | | | | |
|---------------|-------------|--------------|-----|-----|-----------|--|
| Total dollars | \$7,098,347 | \$16,243,572 | \$0 | \$0 | \$442,655 | |
|---------------|-------------|--------------|-----|-----|-----------|--|

**APPENDIX B:
OKLAHOMA WIRES CHARGE DATA AND TABLES**

| | | | | | | |
|---------------------|-----------|-----------|-----|-----|-----------|--|
| Price per fuel unit | \$0.09870 | \$0.00033 | \$0 | \$0 | \$0.00820 | |
|---------------------|-----------|-----------|-----|-----|-----------|--|

**APPENDIX B:
OKLAHOMA WIRES CHARGE DATA AND TABLES**

TABLE 14B:

CHARGE NEEDED ON ALL RESIDENTIAL ENERGY CONSUMPTION (OKLAHOMA)

**APPENDIX B:
OKLAHOMA WIRES CHARGE DATA AND TABLES**

TO GENERATE 125% OF 1986 LIHEAP APPROPRIATION (1995\$)

**APPENDIX B:
OKLAHOMA WIRES CHARGE DATA AND TABLES**

| Residential Only: 125% Scenario (\$30,480,643) | Natural Gas | Electricity | Fuel Oil | Kerosene | LPG | Total |
|--|-------------|-------------|----------|----------|-----|-------|
| | | | | | | |

**APPENDIX B:
OKLAHOMA WIRES CHARGE DATA AND TABLES**

| | | | | | | |
|-------------|----|-------|---|---|-----|-------|
| Billion Btu | 80 | 168.8 | 0 | 0 | 4.6 | 253.4 |
|-------------|----|-------|---|---|-----|-------|

**APPENDIX B:
OKLAHOMA WIRES CHARGE DATA AND TABLES**

| | | | | | | |
|------------|------------|----------------|---|---|------------|--|
| Fuel units | 78,000,000 | 48,469,000,000 | 0 | 0 | 54,012,000 | |
|------------|------------|----------------|---|---|------------|--|

**APPENDIX B:
OKLAHOMA WIRES CHARGE DATA AND TABLES**

| | | | | | | |
|---------------|-----------|-------|---|---|--------|--|
| Btu/fuel unit | 1,025,641 | 3,412 | 0 | 0 | 85,166 | |
|---------------|-----------|-------|---|---|--------|--|

**APPENDIX B:
OKLAHOMA WIRES CHARGE DATA AND TABLES**

| | | | | | | |
|-------------|--------------|--------------|-----|-----|--------------|--|
| Dollars/Btu | \$0.00000012 | \$0.00000012 | \$0 | \$0 | \$0.00000012 | |
|-------------|--------------|--------------|-----|-----|--------------|--|

**APPENDIX B:
OKLAHOMA WIRES CHARGE DATA AND TABLES**

| | | | | | | |
|---------------|-------------|--------------|-----|-----|-----------|--------------|
| Total dollars | \$9,622,934 | \$20,304,336 | \$0 | \$0 | \$553,319 | \$30,480,643 |
|---------------|-------------|--------------|-----|-----|-----------|--------------|

**APPENDIX B:
OKLAHOMA WIRES CHARGE DATA AND TABLES**

| | | | | | | |
|---------------------|-----------|-----------|-----|-----|-----------|--|
| Price per fuel unit | \$0.12337 | \$0.00041 | \$0 | \$0 | \$0.01024 | |
|---------------------|-----------|-----------|-----|-----|-----------|--|

**APPENDIX B:
OKLAHOMA WIRES CHARGE DATA AND TABLES**

TABLE 14C:

CHARGE NEEDED ON ALL RESIDENTIAL ENERGY CONSUMPTION (OKLAHOMA)

**APPENDIX B:
OKLAHOMA WIRES CHARGE DATA AND TABLES**

TO GENERATE 150% OF 1986 LIHEAP APPROPRIATION (1995\$)

**APPENDIX B:
OKLAHOMA WIRES CHARGE DATA AND TABLES**

| Residential Only: 150% Scenario (\$36,576,771) | Natural Gas | Electricity | Fuel Oil | Kerosene | LPG | Total |
|--|-------------|-------------|----------|----------|-----|-------|
| | | | | | | |

**APPENDIX B:
OKLAHOMA WIRES CHARGE DATA AND TABLES**

| | | | | | | |
|-------------|----|-------|---|---|-----|-------|
| Billion Btu | 80 | 168.8 | 0 | 0 | 4.6 | 253.4 |
|-------------|----|-------|---|---|-----|-------|

**APPENDIX B:
OKLAHOMA WIRES CHARGE DATA AND TABLES**

| | | | | | | |
|------------|------------|----------------|---|---|------------|--|
| Fuel units | 78,000,000 | 49,469,000,000 | 0 | 0 | 54,012,000 | |
|------------|------------|----------------|---|---|------------|--|

**APPENDIX B:
OKLAHOMA WIRES CHARGE DATA AND TABLES**

| | | | | | | |
|---------------|-----------|-------|---|---|--------|--|
| Btu/fuel unit | 1,025,641 | 3,412 | 0 | 0 | 85,166 | |
|---------------|-----------|-------|---|---|--------|--|

**APPENDIX B:
OKLAHOMA WIRES CHARGE DATA AND TABLES**

| | | | | | | |
|-------------|--------------|--------------|-----|-----|--------------|--|
| Dollars/Btu | \$0.00000014 | \$0.00000014 | \$0 | \$0 | \$0.00000014 | |
|-------------|--------------|--------------|-----|-----|--------------|--|

**APPENDIX B:
OKLAHOMA WIRES CHARGE DATA AND TABLES**

| | | | | | | |
|---------------|--------------|--------------|-----|-----|-----------|--------------|
| Total dollars | \$11,547,520 | \$24,365,268 | \$0 | \$0 | \$663,982 | \$36,576,771 |
|---------------|--------------|--------------|-----|-----|-----------|--------------|

**APPENDIX B:
OKLAHOMA WIRES CHARGE DATA AND TABLES**

| | | | | | | |
|---------------------|-----------|-----------|-----|-----|-----------|--|
| Price per fuel unit | \$0.14805 | \$0.00099 | \$0 | \$0 | \$0.01229 | |
|---------------------|-----------|-----------|-----|-----|-----------|--|

**APPENDIX B:
OKLAHOMA WIRES CHARGE DATA AND TABLES**

TABLE 14D:
CHARGE NEEDED ON ALL RESIDENTIAL ENERGY CONSUMPTION (OKLAHOMA)

**APPENDIX B:
OKLAHOMA WIRES CHARGE DATA AND TABLES**

TO GENERATE 200% OF 1986 LIHEAP APPROPRIATION (1995\$)

**APPENDIX B:
OKLAHOMA WIRES CHARGE DATA AND TABLES**

| Residential Only: 200% Scenario (\$48,769,028) | Natural Gas | Electricity | Fuel Oil | Kerosene | LPG | Total |
|--|-------------|-------------|----------|----------|-----|-------|
| | | | | | | |

**APPENDIX B:
OKLAHOMA WIRES CHARGE DATA AND TABLES**

| | | | | | | |
|-------------|----|-------|---|---|-----|-------|
| Billion Btu | 80 | 168.8 | 0 | 0 | 4.6 | 253.4 |
|-------------|----|-------|---|---|-----|-------|

**APPENDIX B:
OKLAHOMA WIRES CHARGE DATA AND TABLES**

| | | | | | | |
|------------|------------|----------------|---|---|------------|--|
| Fuel units | 78,000,000 | 48,469,000,000 | 0 | 0 | 54,012,000 | |
|------------|------------|----------------|---|---|------------|--|

**APPENDIX B:
OKLAHOMA WIRES CHARGE DATA AND TABLES**

| | | | | | | |
|---------------|-----------|-------|---|---|--------|--|
| Btu/fuel unit | 1,025,641 | 3,412 | 0 | 0 | 85,166 | |
|---------------|-----------|-------|---|---|--------|--|

**APPENDIX B:
OKLAHOMA WIRES CHARGE DATA AND TABLES**

| | | | | | | |
|-------------|--------------|--------------|-----|-----|--------------|--|
| Dollars/Btu | \$0.00000019 | \$0.00000019 | \$0 | \$0 | \$0.00000019 | |
|-------------|--------------|--------------|-----|-----|--------------|--|

**APPENDIX B:
OKLAHOMA WIRES CHARGE DATA AND TABLES**

| | | | | | | |
|---------------|--------------|--------------|-----|-----|-----------|--------------|
| Total dollars | \$15,396,694 | \$32,487,024 | \$0 | \$0 | \$885,310 | \$48,769,028 |
|---------------|--------------|--------------|-----|-----|-----------|--------------|

**APPENDIX B:
OKLAHOMA WIRES CHARGE DATA AND TABLES**

| | | | | | | |
|---------------------|-----------|-----------|-----|-----|-----------|--|
| Price per fuel unit | \$0.19739 | \$0.00066 | \$0 | \$0 | \$0.01639 | |
|---------------------|-----------|-----------|-----|-----|-----------|--|

**APPENDIX B:
OKLAHOMA WIRES CHARGE DATA AND TABLES**

TABLE 15A:

CHARGE NEEDED ON RESIDENTIAL, INDUSTRIAL AND COMMERCIAL ALL FUELS ENERGY CONSUMPTION (OKLAHOMA)

**APPENDIX B:
OKLAHOMA WIRES CHARGE DATA AND TABLES**

TO GENERATE 100% OF 1986 LIHEAP APPROPRIATION (1995\$)

**APPENDIX B:
OKLAHOMA WIRES CHARGE DATA AND TABLES**

| Residential, Commercial, Industrial: 100% Scenario (\$24,384,514) | Natural Gas | Electricity | Fuel Oil | Kerosene | LPG | Total |
|---|-------------|-------------|----------|----------|-----|-------|
| | | | | | | |

**APPENDIX B:
OKLAHOMA WIRES CHARGE DATA AND TABLES**

| | | | | | | |
|-------------|-------|-------|------|-----|------|-------|
| Billion Btu | 406.9 | 430.2 | 20.2 | 0.1 | 20.1 | 877.5 |
|-------------|-------|-------|------|-----|------|-------|

**APPENDIX B:
OKLAHOMA WIRES CHARGE DATA AND TABLES**

| | | | | | | |
|------------|-------------|-----------------|-------------|-----------|-------------|--|
| Fuel units | 398,000,000 | 126,092,000,000 | 145,278,000 | 1,092,000 | 243,940,000 | |
|------------|-------------|-----------------|-------------|-----------|-------------|--|

**APPENDIX B:
OKLAHOMA WIRES CHARGE DATA AND TABLES**

| | | | | | | |
|---------------|-----------|-------|---------|--------|--------|--|
| Btu/fuel unit | 1,022,362 | 3,412 | 139,044 | 91,575 | 65,972 | |
|---------------|-----------|-------|---------|--------|--------|--|

**APPENDIX B:
OKLAHOMA WIRES CHARGE DATA AND TABLES**

| Dollars/Btu | \$0.000000028 | \$0.000000028 | \$0.000000028 | \$0.000000028 | \$0.000000028 | |
|-------------|---------------|---------------|---------------|---------------|---------------|--|
| | | | | | | |

**APPENDIX B:
OKLAHOMA WIRES CHARGE DATA AND TABLES**

| | | | | | | |
|---------------|--------------|--------------|-----------|---------|-----------|--|
| Total dollars | \$11,366,776 | \$12,017,663 | \$564,288 | \$2,794 | \$432,993 | |
|---------------|--------------|--------------|-----------|---------|-----------|--|

**APPENDIX B:
OKLAHOMA WIRES CHARGE DATA AND TABLES**

| | | | | | | |
|---------------------|-----------|-----------|-----------|-----------|-----------|--|
| Price per fuel unit | \$0.02856 | \$0.00010 | \$0.00388 | \$0.00256 | \$0.00184 | |
|---------------------|-----------|-----------|-----------|-----------|-----------|--|

**APPENDIX B:
OKLAHOMA WIRES CHARGE DATA AND TABLES**

TABLE 15B:

CHARGE NEEDED ON RESIDENTIAL, COMMERCIAL AND INDUSTRIAL ALL FUELS ENERGY CONSUMPTION (OKLAHOMA)

**APPENDIX B:
OKLAHOMA WIRES CHARGE DATA AND TABLES**

TO GENERATE 125% OF 1986 LIHEAP APPROPRIATION (1995\$)

**APPENDIX B:
OKLAHOMA WIRES CHARGE DATA AND TABLES**

| Residential, Commercial, Industrial: 125% Scenario (\$30,480,643) | Natural Gas | Electricity | Fuel Oil | Kerosene | LPG | Total |
|---|-------------|-------------|----------|----------|-----|-------|
| | | | | | | |

**APPENDIX B:
OKLAHOMA WIRES CHARGE DATA AND TABLES**

| | | | | | | |
|-------------|-------|-------|------|-----|------|-------|
| Billion Btu | 406.9 | 430.2 | 20.2 | 0.1 | 20.1 | 877.5 |
|-------------|-------|-------|------|-----|------|-------|

**APPENDIX B:
OKLAHOMA WIRES CHARGE DATA AND TABLES**

| | | | | | | |
|------------|-------------|-----------------|-------------|-----------|-------------|--|
| Fuel units | 398,000,000 | 126,092,000,000 | 145,278,000 | 1,092,000 | 243,948,000 | |
|------------|-------------|-----------------|-------------|-----------|-------------|--|

**APPENDIX B:
OKLAHOMA WIRES CHARGE DATA AND TABLES**

| | | | | | | |
|---------------|-----------|-------|---------|--------|--------|--|
| Btu/fuel unit | 1,022,362 | 3,412 | 139,044 | 91,575 | 65,972 | |
|---------------|-----------|-------|---------|--------|--------|--|

**APPENDIX B:
OKLAHOMA WIRES CHARGE DATA AND TABLES**

| Dollars/Btu | \$0.000000035 | \$0.000000035 | \$0.000000035 | \$0.000000035 | \$0.000000035 | |
|-------------|---------------|---------------|---------------|---------------|---------------|--|
| | | | | | | |

**APPENDIX B:
OKLAHOMA WIRES CHARGE DATA AND TABLES**

| | | | | | | |
|---------------|--------------|--------------|-----------|---------|-----------|--|
| Total dollars | \$14,208,470 | \$15,022,079 | \$705,360 | \$3,492 | \$541,242 | |
|---------------|--------------|--------------|-----------|---------|-----------|--|

**APPENDIX B:
OKLAHOMA WIRES CHARGE DATA AND TABLES**

| | | | | | | |
|---------------------|-----------|-----------|-----------|-----------|-----------|--|
| Price per fuel unit | \$0.03570 | \$0.00012 | \$0.00486 | \$0.00320 | \$0.00230 | |
|---------------------|-----------|-----------|-----------|-----------|-----------|--|

**APPENDIX B:
OKLAHOMA WIRES CHARGE DATA AND TABLES**

TABLE 15C:

CHARGE NEEDED ON RESIDENTIAL, COMMERCIAL AND INDUSTRIAL ALL FUELS ENERGY CONSUMPTION (OKLAHOMA)

**APPENDIX B:
OKLAHOMA WIRES CHARGE DATA AND TABLES**

TO GENERATE 150% OF 1986 LIHEAP APPROPRIATION (1995\$)

**APPENDIX B:
OKLAHOMA WIRES CHARGE DATA AND TABLES**

| Residential, Commercial, Industrial: 150% Scenario (\$36,576,771) | Natural Gas | Electricity | Fuel Oil | Kerosene | LPG | Total |
|---|-------------|-------------|----------|----------|-----|-------|
| | | | | | | |

**APPENDIX B:
OKLAHOMA WIRES CHARGE DATA AND TABLES**

| | | | | | | |
|-------------|-------|-------|------|-----|------|-------|
| Billion Btu | 406.9 | 430.2 | 20.2 | 0.1 | 20.1 | 877.5 |
|-------------|-------|-------|------|-----|------|-------|

**APPENDIX B:
OKLAHOMA WIRES CHARGE DATA AND TABLES**

| | | | | | | |
|------------|-------------|-----------------|-------------|-----------|-------------|--|
| Fuel units | 398,000,000 | 126,092,000,000 | 145,278,000 | 1,092,000 | 243,948,000 | |
|------------|-------------|-----------------|-------------|-----------|-------------|--|

**APPENDIX B:
OKLAHOMA WIRES CHARGE DATA AND TABLES**

| | | | | | | |
|---------------|-----------|-------|---------|--------|--------|--|
| Btu/fuel unit | 1,022,362 | 3,412 | 139,044 | 91,575 | 65,972 | |
|---------------|-----------|-------|---------|--------|--------|--|

**APPENDIX B:
OKLAHOMA WIRES CHARGE DATA AND TABLES**

| Dollars/Btu | \$0.000000042 | \$0.000000042 | \$0.000000042 | \$0.000000042 | \$0.000000042 | |
|-------------|---------------|---------------|---------------|---------------|---------------|--|
| | | | | | | |

**APPENDIX B:
OKLAHOMA WIRES CHARGE DATA AND TABLES**

| | | | | | | |
|---------------|--------------|--------------|-----------|---------|-----------|--|
| Total dollars | \$17,050,164 | \$18,026,494 | \$846,432 | \$4,190 | \$649,490 | |
|---------------|--------------|--------------|-----------|---------|-----------|--|

**APPENDIX B:
OKLAHOMA WIRES CHARGE DATA AND TABLES**

| | | | | | | |
|---------------------|-----------|-----------|-----------|-----------|-----------|--|
| Price per fuel unit | \$0.04284 | \$0.00014 | \$0.00583 | \$0.00384 | \$0.00276 | |
|---------------------|-----------|-----------|-----------|-----------|-----------|--|

**APPENDIX B:
OKLAHOMA WIRES CHARGE DATA AND TABLES**

TABLE 15D:

CHARGE NEEDED ON RESIDENTIAL, COMMERCIAL AND INDUSTRIAL ALL FUELS ENERGY CONSUMPTION (OKLAHOMA)

**APPENDIX B:
OKLAHOMA WIRES CHARGE DATA AND TABLES**

TO GENERATE 200% OF 1986 LIHEAP APPROPRIATION (1995\$)

**APPENDIX B:
OKLAHOMA WIRES CHARGE DATA AND TABLES**

| Residential, Commercial and Industrial: 200% Scenario (\$48,769,028) | Natural Gas | Electricity | Fuel Oil | Kerosene | LPG | Total |
|--|-------------|-------------|----------|----------|-----|-------|
| | | | | | | |

**APPENDIX B:
OKLAHOMA WIRES CHARGE DATA AND TABLES**

| | | | | | | |
|-------------|-------|-------|------|-----|------|-------|
| Billion Btu | 406.9 | 430.2 | 20.2 | 0.1 | 20.1 | 877.5 |
|-------------|-------|-------|------|-----|------|-------|

**APPENDIX B:
OKLAHOMA WIRES CHARGE DATA AND TABLES**

| | | | | | | |
|------------|-------------|-----------------|-------------|-----------|-------------|--|
| Fuel units | 398,000,000 | 126,092,000,000 | 145,278,000 | 1,092,000 | 243,940,000 | |
|------------|-------------|-----------------|-------------|-----------|-------------|--|

**APPENDIX B:
OKLAHOMA WIRES CHARGE DATA AND TABLES**

| | | | | | | |
|---------------|-----------|-------|---------|--------|--------|--|
| Btu/fuel unit | 1,022,362 | 3,412 | 139,044 | 91,575 | 65,972 | |
|---------------|-----------|-------|---------|--------|--------|--|

**APPENDIX B:
OKLAHOMA WIRES CHARGE DATA AND TABLES**

| Dollars/Btu | \$0.000000056 | \$0.000000056 | \$0.000000056 | \$0.000000056 | \$0.000000056 | |
|-------------|---------------|---------------|---------------|---------------|---------------|--|
| - 118 - | | | | | | |

**APPENDIX B:
OKLAHOMA WIRES CHARGE DATA AND TABLES**

| | | | | | | |
|---------------|--------------|--------------|-------------|---------|-----------|--|
| Total dollars | \$22,733,552 | \$24,035,326 | \$1,128,576 | \$5,587 | \$865,987 | |
|---------------|--------------|--------------|-------------|---------|-----------|--|

**APPENDIX B:
OKLAHOMA WIRES CHARGE DATA AND TABLES**

| | | | | | | |
|---------------------|-----------|-----------|-----------|-----------|-----------|--|
| Price per fuel unit | \$0.05712 | \$0.00019 | \$0.00777 | \$0.00512 | \$0.00369 | |
|---------------------|-----------|-----------|-----------|-----------|-----------|--|

**APPENDIX B:
OKLAHOMA WIRES CHARGE DATA AND TABLES**

| Table 14: Number of Low-Income Families in Oklahoma at Different Measures of "Low-Income" | | | | | |
|---|----------|----------|------------------------------|---------|---------|
| Number of Families | | | | | |
| Percent of federal Poverty Level /a/ | | | Percent of Median Income /b/ | | |
| 0 - 100% | 0 - 150% | 0 - 200% | 0 - 30% | 0 - 50% | 0 - 80% |
| 195,675 | 328,454 | 461,169 | 154,336 | 304,176 | 511,451 |
| Sources: /a/Census Bureau (1990) /b/HUD CHAS data base (1990) | | | | | |

APPENDIX C:
SUMMARY OF FUNDRAISING INITIATIVES DISCUSSED IN
FUNDING FUEL ASSISTANCE: STATE AND LOCAL STRATEGIES
TO HELP PAY LOW-INCOME HOME ENERGY BILLS

Table of Program Suggestions

1. Utility bill checkoffs for fuel funds
2. Electronic funds transfer (EFT) billing
3. Early payment agreements
4. Contributions of utility refunds
5. Recapture of unclaimed deposits
6. Recapture of unclaimed utility refunds
7. Ratepayer assistance trust fund
8. Franchise fees--rental payments
9. Rate discounts
10. "One Church--One Family"
11. Contributions in lieu of taxes
12. Universal Service Fund
13. Earned Income Tax Credit promotion
14. State Earned Income Tax Credit

APPENDIX C:
SUMMARY OF FUNDRAISING INITIATIVES DISCUSSED IN
FUNDING FUEL ASSISTANCE: STATE AND LOCAL STRATEGIES
TO HELP PAY LOW-INCOME HOME ENERGY BILLS

15.Promotion of circuit breaker property tax relief

16.State tax credits

17.Sales tax relief on home energy

18.Title IV-A: Emergency Assistance/Special Needs

19.Utility allowances in assisted housing: annual

20.Utility allowances in assisted housing: monthly

21.Bulk fuels: cash prices

22.Bulk fuels: across-the-board discount

23.Bulk fuels: margin over rack program

24.Bulk fuels: summer fill program

25.Bulk fuels: winter shutoff protections