

**SOUTHERN INDIANA GAS AND ELECTRIC COMPANY**  
**D/B/A VECTREN ENERGY DELIVERY OF INDIANA, INC.**  
**(VECTREN SOUTH)**  
**A CENTERPOINT ENERGY COMPANY**

**IURC CAUSE NO. 45447**

**DIRECT TESTIMONY**  
**OF**  
**TERESA JOY CULLUM**  
**SUPERVISOR, CREDIT AND COLLECTIONS**

**ON**

**VECTREN SOUTH'S UNIVERSAL SERVICE PROGRAM**

**SPONSORING PETITIONER'S EXHIBIT NO. 15,**  
**ATTACHMENTS TJC-1 THROUGH TJC-2**

### Glossary of Acronyms

CAP	Community Action Program
CenterPoint	CenterPoint Energy, Inc.
Company	Southern Indiana Gas and Electric Company d/b/a Vectren Energy Delivery of Indiana, Inc.
IHCDA	Indiana Housing and Community Development Authority
IURC or Commission	Indiana Utility Regulatory Commission
LIHEAP	Low Income Home Energy Assistance Program
Petitioner	Southern Indiana Gas and Electric Company d/b/a Vectren Energy Delivery of Indiana, Inc.
Program	Universal Service Program
SMI	State Median Income
USF	Universal Service Fund
USP	Universal Service Program
Vectren	Southern Indiana Gas and Electric Company d/b/a Vectren Energy Delivery of Indiana, Inc.
Vectren North	Indiana Gas Company, Inc. d/b/a Vectren Energy Delivery of Indiana, Inc.
Vectren South	Southern Indiana Gas and Electric Company d/b/a Vectren Energy Delivery of Indiana, Inc.
Vectren Ohio	Vectren Energy Delivery of Ohio, Inc.

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**DIRECT TESTIMONY OF TERESA JOY CULLUM**

1 **I. INTRODUCTION**

2

3 **Q. Please state your name and business address.**

4 A. My name is Teresa Joy Cullum. My business address is 211 NW Riverside Drive,  
5 Evansville, Indiana, 47708.

6

7 **Q. By whom are you employed?**

8 A. I am employed by Vectren Corporation ("Vectren"), a wholly-owned subsidiary of  
9 CenterPoint Energy, Inc. ("CenterPoint").

10

11 **Q. On whose behalf are you testifying in this proceeding?**

12 A. I am testifying on behalf of Southern Indiana Gas and Electric Company d/b/a  
13 Vectren Energy Delivery of Indiana, Inc. ("Petitioner", "Vectren South" or "the  
14 Company"), which is a subsidiary of Vectren.

15

16 **Q. What is your role with respect to Petitioner Vectren South?**

17 A. I am Supervisor of Credit & Collections for Vectren, which is the parent company of  
18 the Petitioner. I have the same role with two other utility subsidiaries of Vectren –  
19 Indiana Gas Company, Inc. d/b/a Vectren Energy Delivery of Indiana, Inc. ("Vectren  
20 North") and Vectren Energy Delivery of Ohio, Inc. ("Vectren Ohio").

21

22 **Q. Please describe your educational background.**

23 A. I earned a Bachelor of Arts degree in Management with an emphasis in Business

1 Administration from the University of Northern Iowa, a public university located in  
2 Cedar Falls, Iowa in 1994.

3

4 **Q. Please describe your professional experience.**

5 A. In 2001, I began my career with Vectren in the Remittance Department as a Team  
6 Lead. Remittance and Credit & Collections areas were later combined to form the  
7 Receivables Management Department, which included customer payment channel  
8 management and reporting, returned customer payments, customer payment  
9 exceptions, customer deposit management, customer credit refunds, and residential  
10 collection management. During my tenure in Receivables Management, I was  
11 promoted to Supervisor in 2015. In February 2019, I assumed the role of Supervisor  
12 of Credit & Collections, which includes oversight of Indiana Low Income Programs.

13

14 **Q. What are your present duties and responsibilities as Supervisor of Credit &  
15 Collections?**

16 A. I have responsibility for low income programs management as well as credit approval  
17 and collection activities for residential and commercial customers, to include outside  
18 collection agency management.

19

20 **Q. Have you ever testified before any state regulatory commission?**

21 A. Yes. I provided direct testimony on behalf of the Company in Cause No. 45405 to  
22 support its request to continue the Universal Service Program ("USP" or "Program")  
23 beyond September 30, 2020, until such Program can be reviewed in a base rate case.

1 **Q. What is the purpose of your testimony in this proceeding?**

2 A. I will support the Company's request to continue the USP with certain modifications as  
3 described later in this testimony. The current USP was most recently approved in the  
4 Commission's Order in Cause No. 45405 dated September 23, 2020 which authorized  
5 the USP as approved on September 10, 2014 in Cause No. 44455 to continue without  
6 modification, except to its expiration date, until the Commission approves a final order  
7 in the Company's next gas rate case (which is this proceeding).

8

9 **Q. Are you sponsoring any attachments in this proceeding?**

10 A. Yes. I am sponsoring the following attachments in this proceeding:

- 11 • Petitioner's Exhibit No. 15, Attachment TJC-1: A listing of community action  
12 program ("CAP") agencies serving Vectren South's service territories.
- 13 • Petitioner's Exhibit No. 15, Attachment TJC-2: A table showing historical  
14 distributions to Vectren South's customers.

15

16 **Q. Were these attachments prepared by you or under your supervision?**

17 A. Yes, they were.

18

19

20 **II. BACKGROUND**

21

22 **Q. Briefly describe the history of the USP.**

23 A. In 2004, the Commission approved the USP as a pilot program in an Order in Cause  
24 No. 42590. Since that time, various Orders have extended the USP program and it  
25 remains in existence today to assist low income residential customers throughout

1 Indiana who qualify for the Indiana Low Income Home Energy Assistance Program  
2 (“LIHEAP”) during the heating season.

3

4 **Q. What is LIHEAP?**

5 A. LIHEAP is a federally funded program that helps low-income households with their  
6 home energy bills. Indiana customers struggling to pay utility bills apply for LIHEAP  
7 assistance by contacting their local Community Action Program (“CAP”) agency. The  
8 Indiana Housing and Community Development Authority (“IHCDA”) administers and  
9 oversees LIHEAP funds that are allocated to Indiana CAP agencies. CAP agencies  
10 determine customer eligibility for LIHEAP funding during the intake process.

11

12 **Q. What household income guidelines are currently used for Indiana LIHEAP?**

13 A. Prior to the 2018/2019 heating season, the household income guideline used for  
14 Indiana LIHEAP was at or below 150% of the Federal Poverty Level. In 2018, the  
15 household income guideline was modified to at or below 60% State Median Income.

Family of Four (4)

	100%	60%	70%
<b>2020 Indiana State Median Income (SMI)</b>	\$ 79,598	\$ 47,759	\$ 55,719

Family of Four (4)

	100%	150%	200%
<b>2020 Federal Poverty Level (FPL)</b>	\$ 26,200	\$ 39,300	\$ 52,400

16

17

18 **III. PROGRAM STRUCTURE**

19

20 **Q. What is the design or structure of USP?**

21 A. The USP has two elements – bill discounts and crisis hardship fund.

1 **Q. What are the USP bill discounts?**

2 A. USP bill discounts are tiered discounts received by customers who qualify for LIHEAP  
3 funding. The USP bill discounts provide a monthly credit for qualifying customers  
4 beginning December 1st (or upon receipt of a transmittal from the CAP agency  
5 indicating the customer qualifies) and continues through May 31 of the following year.  
6 These discounts are designed to make heating bills more manageable for low-income  
7 customers. The net bill for residential gas service provided to Vectren South's low-  
8 income customers participating in USP is 15%, 26% or 32% lower than it otherwise  
9 would be, depending on the applicant's eligibility for the state's benefit matrix used to  
10 determine LIHEAP eligibility.

11  
12 **Q. How are eligible customers enrolled in Vectren South's USP bill discounts?**

13 A. Vectren South works closely with CAP agencies within the Company's service  
14 territories. The CAP agencies distribute LIHEAP funding and qualify customers for  
15 USP discounts. The amount of the bill discount (15%, 26%, or 32%) is determined  
16 within the qualification process. Each day a file is electronically transferred from the  
17 CAP agencies to Vectren South that identifies the amount of the LIHEAP assistance  
18 the customer should have applied to their account and activates the appropriate USP  
19 discount tier within Vectren South's billing system.

20  
21 **Q. Which CAP agencies provide service in Vectren South's service territories?**

22 A. Please reference Petitioner's Exhibit No. 15, Attachment TJC-1. The attachment is a  
23 list of the CAP agencies that serve low-income customers in Vectren South's service  
24 territories.



1 **Q. What is the crisis hardship fund?**

2 A. Currently, the crisis hardship fund is intended to assist customers at or below 200% of  
3 the poverty guideline, providing assistance of up to \$200 to establish or retain natural  
4 gas service where a customer is facing a life event crisis, such as job loss or  
5 catastrophic illness. The crisis hardship fund also provides up to \$200 to establish or  
6 retain gas service for customers previously identified as a monthly USP bill discount  
7 recipient through the state's LIHEAP qualification process and entered into a payment  
8 arrangement for the portion of the remaining bill not covered by LIHEAP benefit and  
9 monthly discount.

10

11 **Q. How does a customer receive crisis hardship funding?**

12 A. Vectren South's customers are advised of this program when they contact Customer  
13 Service and express hardship. Vectren South's Customer Service Department  
14 qualifies customers directly and the customer self-declares the income eligibility.

15

16 **Q. How is the USP program funded?**

17 A. Currently, Vectren South contributes 30% of total program costs to fund the USP,  
18 which includes bill discounts and crisis hardship assistance. The other 70% is funded  
19 by customer contributions through the Universal Service Fund ("USF") Rider currently  
20 in place.

21

22 **Q. How do customer contributions fund the USP?**

23 A. A low-cost contribution is applied to all customer bills. For example, the currently  
24 effective Vectren South USF Rider as of October 1, 2020 is \$0.0041 per therm. Based  
25 on an average use per residential customer of 652 therms per year, Vectren South

1 customers are each contributing \$2.67 per year towards the USP. Petitioner's Witness  
2 Katie J. Tieken will elaborate on the structure of the USF Rider and customer bill  
3 impacts.

4  
5 **Q. How many of Vectren South's residential customers have participated in the**  
6 **USP?**

7 A. During the 2018/2019 heating season, Vectren South had 3,454 customers enrolled  
8 in USP. These customers received monthly discounts of \$333,002 during the  
9 2018/2019 heating season. The program has also provided crisis hardship assistance  
10 to 545 Vectren South residential customers during the 2018/2019 heating season.  
11 During the 2019/2020 heating season, 3,003 Vectren South residential customers  
12 received monthly discounts of \$288,089. Crisis hardship assistance was provided to  
13 556 Vectren South residential customers during the 2019/2020 heating season.  
14 Additional information from prior heating seasons through 2019/2020 is provided in  
15 Petitioner's Exhibit No. 15, Attachment TJC-2.

South							
		USP			Crisis/Hardship		
Season	# HH	\$ BENEFIT	\$ AVG	#HH	\$ BENEFIT	\$ AVG	
2018/2019	3,454	\$ 333,002	\$96	545	\$ 97,600	\$179	
2019/2020	3,003	\$ 288,089	\$96	556	\$ 96,797	\$174	

16  
17  
18  
19 **Q. What are the benefits of the Universal Service Program?**

20 A. Vectren South's USP provided significant monthly bill discounts totaling \$1,656,542 to  
21 participating low-income customers since heating season 2014/2015 through  
22 2019/2020. An additional \$717,632 in crisis hardship assistance was provided during  
23 the 2014/2015 heating seasons through 2019/2020. To see a breakdown by season

1 for bill discounts and crisis hardship assistance see Petitioner's Exhibit No. 15,  
2 Attachment TJC-2.

3

4

5 **IV. USP EXTENSION REASONABLENESS**

6

7 **Q. Why should the Commission extend Vectren South's USP?**

8 A. Vectren's USPs have been in place since 2004 and should be extended as these long-  
9 standing programs will continue to provide assistance to Indiana low-income  
10 customers. One measure of effectiveness of the USP is to review bad debt associated  
11 with low-income customers. The average write-off rate for Vectren's Indiana low-  
12 income customers pre-USP (2003/2004) was 24%. The average over the period of  
13 2005 through 2018 ranged from 10% to 15% compared to the average write off for  
14 Indiana low income customers during the 2018-2019 heating season at 6%. The  
15 average write-off for Vectren South non low-income customers during the 2018-2019  
16 heating season was 4.5%. USP is a contributing factor in reducing the write-off rate  
17 for low-income customers. Discontinuation of this program would result in elimination  
18 of the significant bill discounts and crisis hardship assistance benefits to low-income  
19 and vulnerable customers that need it most in Vectren South's service territories.  
20 Petitioner's Exhibit No. 15, Attachment TJC-2 shows the number of customers who  
21 have benefitted from Vectren South's USP in the past. Without these programs, these  
22 customers would not receive the benefit of a bill discount and crisis hardship  
23 assistance.

1 **Q. How will Vectren South's low-income customers be impacted if the USP is**  
2 **allowed to expire or discontinued?**

3 A. Vectren South's low-income customers who participate or who are eligible to  
4 participate in the USP and interested in doing so would be adversely impacted if the  
5 bill discounts and crisis hardship funds provided through the USPs expire or are  
6 discontinued. The result of terminating this assistance would be an increase in  
7 customers in threat of disconnection and the potential subsequent adverse actions.

8

9 **Q. Is there an impact to non-participating customers if the USP is allowed to expire**  
10 **or discontinued?**

11 A. Excluding any remaining over/under recovery charges or credits from the previous  
12 heating season reconciliation, all Vectren South customers would cease to pay  
13 Universal Service Fund ("USF") Rider charges on their bill, which would result in a  
14 decrease of approximately \$2.67 per residential customer per year for Vectren South.  
15 However, all Vectren South customers could pay higher costs through the bad debt  
16 component of the Gas Cost Adjustment mechanism and through base rates in future  
17 general rate proceedings, which will offset, at least in part, the decrease in USF  
18 charges.

19

20 **Q. What impact will COVID-19 have on the need for the USP and Indiana**  
21 **customers?**

22 A. The impact COVID-19 has had on Hoosier households continues to unfold. The long-  
23 term need for bill discounts and crisis hardship funding is expected to grow as a result  
24 of the new health and economic crisis resulting from COVID-19. As of October 20,

1 2020, over 149,000 Hoosiers have tested positive for the coronavirus, with just over  
2 3,700 fatalities.<sup>1</sup>

3  
4 In June 2019, the Indiana unemployment rate was 3.3% as compared to 11.2% in  
5 June 2020.<sup>2</sup>

### Midwest Unemployment Rates

	June 2019	May 2020	June 2020	Monthly change	Yearly change
Indiana	3.3%	12.3%	11.2%	-1.1%	+7.9%
U.S.	3.7%	13.3%	11.1%	-2.2%	+7.4%

6  
7 Customers continue to be challenged to meet their monthly obligations related to utility  
8 bills, rent/mortgage, and other essential needs (i.e. food, medical care). Renters and  
9 homeowners are struggling to pay their housing bill on-time and in full. According to  
10 a July 8, 2020 article published by “Apartment List”, 32% of Americans did not make  
11 a full on-time payment in July, which was up slightly from 30% in June.<sup>3</sup> Furthermore,  
12 a recent random sample survey conducted by email July 6-7 by the NFIB of their  
13 membership database of approximately 300,000 small business owners and 615  
14 usable responses, reported that approximately 22% of small businesses claim they  
15 have or expect to begin furloughing employees as a result of Paycheck Protection  
16 Program assistance running out.<sup>4</sup> The small business survey results may indicate that

<sup>1</sup> Source: Indiana Covid-19 Dashboard <https://www.coronavirus.in.gov/> accessed on October 20, 2020.

<sup>2</sup> Source: Indiana Department of Workforce Development <https://calendar.in.gov/site/dwd/event/june-indiana-employment-report-4/> accessed on August 5, 2020.

<sup>3</sup> Source: “Missed Housing Payments Continue Piling Up in July” from <https://www.apartmentlist.com/research/july-housing-payments> accessed on August 5, 2020.

<sup>4</sup> Source: “Covid-19 Small Business Survey”. <https://assets.nfib.com/nfibcom/Covid-19-9-Write-up-and-Questionnaire-7-7-2020-FINAL.pdf> accessed August 5, 2020.

1 the position for the labor market may decline or slow to recover as stimulus aid  
2 expires.<sup>5</sup> Although the fallout of the coronavirus continues to unfold, the need for the  
3 USP is greater now more than ever. Programs such as the USPs (and others cited in  
4 the Commission's Second Interim Emergency Order in Cause No. 45380<sup>6</sup>) are vital to  
5 helping customers with payment of utilities during this pandemic.

6

7

8 **V. VECTREN'S PROPOSAL FOR USP EXTENSION**

9

10 **Q. What is Vectren South's proposal to modify the USP?**

11 A. Vectren South is proposing three (3) modifications regarding USP as described  
12 below.

13

14 **Q. Please explain the first proposed modification.**

15 A. Vectren South is proposing continuation of the USP program until a request is made  
16 by the Company to terminate. Continuation until a request to terminate would align  
17 Vectren South's USP with the other two largest<sup>7</sup> natural gas utility USPs. For  
18 example, Citizens Energy's USP remains in place until a request is made to the  
19 Commission to terminate; and NIPSCO's USP does not have a defined expiration  
20 date.

---

<sup>5</sup> Source: "One in Five U.S. Small Firms Plan Layoffs After Using PPP Loan"  
<https://assets.nfib.com/nfibcom/Covid-19-9-Write-up-and-Questionnaire-7-7-2020-FINAL.pdf>  
accessed on August 5, 2020.

<sup>6</sup> Second Interim Emergency Order, Cause No. 45380 (IURC August 12, 2020), p. 2

<sup>7</sup> Other than Vectren South's affiliate Indiana Gas Company, Inc. d/b/a Vectren Energy Delivery of Indiana, Inc. ("Vectren North").

1 **Q. What is the second proposed modification to the USP?**

2 A. Vectren South also proposes the bill discount tiers of 15%, 26% and 32% remain the  
3 same with the ability to adjust in future heating seasons depending on changes  
4 made to LIHEAP customer eligibility requirements. For example, when the State  
5 changed income eligibility from 150% of FPL to 60% state median income in the  
6 2018-2019 heating season, this resulted in a shift of customers receiving the highest  
7 bill discount of 32%. As shown in Petitioner's Exhibit No. 15, Attachment TJC-2, in  
8 2017-2018 there were 4% of customers in Tier 3 vs. 62% Tier 3 for 2018-2019  
9 heating season. Our proposed modification would help the Company mitigate such  
10 large swings from tier to tier in the future.

11  
12 **Q. What is the third proposed change?**

13 A. Vectren South is also proposing to modify the self-declared household income  
14 eligibility requirement for crisis hardship fund from the current at or below 200%  
15 Federal Poverty Level to at or below 70% of the State Median Income. This will assist  
16 those that meet LIHEAP household income guidelines and those that express  
17 hardship whose income is low but fall outside the household income guidelines and  
18 unable to receive LIHEAP benefits. Citizens Energy's adjusted the self-declared  
19 household income eligibility for their crisis hardship fund from the 200% Federal  
20 Poverty Level to 70% of the State Median Income when the state adopted 60% of the  
21 State Median Income for LIHEAP household income qualification. Citizens Energy  
22 found the 200% Federal Poverty Level was too close to the 60% State Median Income.  
23 NIPSCO is currently using 150-200% Federal Poverty Level as household income  
24 eligibility basis for their crisis program. The State Median Income ("SMI") in Indiana for  
25 Federal Fiscal Year 2020 for a family of (4) is \$79,598. Sixty percent (60%) of Indiana

1 SMI is \$47,759 and seventy percent (70%) of Indiana SMI is \$55,719.

2

3 One hundred fifty percent (150%) of the Federal Poverty Level for 2020<sup>8</sup> for a family  
4 of four is \$39,300 and 200% of the Federal Poverty Level for 2020 for a family of four  
5 is \$52,400.

Family of Four (4)			
	100%	60%	70%
<b>2020 Indiana State Median Income (SMI)</b>	\$ 79,598	\$ 47,759	\$ 55,719

Family of Four (4)			
	100%	150%	200%
<b>2020 Federal Poverty Level (FPL)</b>	\$ 26,200	\$ 39,300	\$ 52,400

6

7 This change will align Vectren South with Citizens Energy's self-declared income  
8 eligibility for the crisis hardship funding and allow more Hoosiers the opportunity to  
9 be eligible for the crisis hardship funding.

10

11

12 **VI. STATUTORY AUTHORITY**

13

14 **Q. Under what authority is the USP authorized?**

15 A. Vectren South and the other gas utilities offering the USP have done so under  
16 alternative regulatory plans authorized by IC 8-1-2.5. IC 8-1-2.5-6 provides:

17 (a) Notwithstanding any other law or rule adopted by the commission, except  
18 those cited, or rules adopted that pertain to those cited, in section 11 of this  
19 chapter, in approving retail energy services or establishing just and

<sup>8</sup> Source: <https://aspe.hhs.gov/poverty-guidelines> and <https://www.payingforseniorcare.com/federal-poverty-level/>



1 reasonable rates and charges, or both for an energy utility electing to  
2 become subject to this section, the commission may do the following:

3 (1) Adopt alternative regulatory practices, procedures, and  
4 mechanisms, and establish rates and charges that:

5 (A) are in the public interest as determined by consideration of  
6 the factors described in section 5 of this chapter; and

7 (B) enhance or maintain the value of the energy utility's retail  
8 energy services or property; including practices, procedures,  
9 and mechanisms focusing on the price, quality, reliability,  
10 and efficiency of the service provided by the energy utility.

11  
12 The "factors in section 5" are set forth in IC 8-1-2.5-5:

13 (b) In determining whether the public interest will be served, the commission  
14 shall consider the following:

15 (1) Whether technological or operating conditions, competitive forces,  
16 or the extent of regulation by other state or federal regulatory bodies  
17 render the exercise, in whole or in part, of jurisdiction by the  
18 commission unnecessary or wasteful.

19 (2) Whether the commission's declining to exercise, in whole or in part,  
20 its jurisdiction will be beneficial for the energy utility, the energy  
21 utility's customers, or the state.

22 (3) Whether the commission's declining to exercise, in whole or in part,  
23 its jurisdiction will promote energy utility efficiency.

1 (4) Whether the exercise of commission jurisdiction inhibits an energy  
2 utility from competing with other providers of functionally similar  
3 energy services or equipment  
4

5 **Q. Should Vectren South's request to continue the USP program with the**  
6 **modifications you have described be approved?**

7 A. Yes. Vectren South continues to elect to be subject to IC 8-1-2.5-6 for purposes of  
8 the USP. The Commission has previously found that the USP promotes energy  
9 utility efficiency because it makes heating bills more manageable during winter  
10 heating months, and it reduces service terminations and costs related to collections  
11 and arrearages. The USP with the proposed modifications will continue to  
12 accomplish these objectives. Further, the USP as modified will continue to  
13 encourage participants to manage their utility bills and to conserve. As such, the  
14 USP with the modifications I have described is in the public interest and should be  
15 approved.  
16  
17

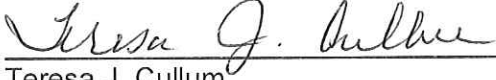
18 **VII. CONCLUSION**

19  
20 **Q. Does this conclude your prepared direct testimony?**

21 A. Yes, it does.

**VERIFICATION**

I, Teresa J. Cullum, affirm under the penalties of perjury that the forgoing representations of fact in my Direct Testimony are true to the best of my knowledge, information and belief.

  
\_\_\_\_\_  
Teresa J. Cullum

Dated: October 30, 2020

**COMMUNITY ACTION AGENCIES SERVING VECTREN SOUTH SERVICE TERRITORY**

	<b>Agency Name</b>	<b>Counties Served</b>
HUEDC	Hoosier Uplands Economic Development Corp.	Martin
PACE	PACE Community Action, Inc.	Daviess, Knox
CAPE	Community Action Program of Evansville	Vanderburgh, Posey, Gibson
LHDC	Lincoln Hills Development Corp.	Spencer
TriCap	Dubois-Pike-Warrick Economic Opportunity Committee, Inc.	Pike, Warrick

South									
Season	LIHEAP			USP Discounts			Crisis/Hardship		
	# HH	\$ BENEFIT	\$ AVG	# HH	\$ BENEFIT (1)	\$ AVG	#HH	\$ BENEFIT (1)	\$ AVG
2014/2015	5,455	\$ 2,608,625	\$478	3,967	\$ 337,384	\$85	957	\$ 179,161	\$187
2015/2016	5,783	\$ 2,832,524	\$490	3,584	\$ 200,119	\$56	581	\$ 96,626	\$166
2016/2017	5,911	\$ 2,584,823	\$437	3,531	\$ 216,409	\$61	582	\$ 103,011	\$177
2017/2018	6,126	\$ 3,875,908	\$633	3,481	\$ 281,539	\$81	778	\$ 144,437	\$186
2018/2019	5,923	\$ 2,756,841	\$465	3,454	\$ 333,002	\$96	545	\$ 97,600	\$179
2019/2020	8,946	\$ 2,872,170	\$321	3,003	\$ 288,089	\$96	556	\$ 96,797	\$174

South							
<u>Level</u>	<u>Discount Amount</u>	<u>2014/2015</u>	<u>2015/2016</u>	<u>2016/2017</u>	<u>2017/2018</u>	<u>2018/2019</u>	<u>2019/2020</u>
Tier 1	15%	26%	26%	29%	35%	7%	7%
Tier 2	26%	67%	66%	64%	61%	31%	24%
Tier 3	32%	7%	7%	7%	4%	62%	69%

Notes:

(1) USP Discounts and Crisis Hardship dollars from Company's Annual USP Compliance filings, Cause No. 44455  
Low Income Home Energy Assistance Program ("LIHEAP")  
Universal Service Program ("USP")