

Proposed Plan for a Low-Income Energy Affordability Program (LEAP)

RE: NEW YORK PUBLIC SERVICE COMMISSION CASES 94-E0952 et al.
In the Matter of Competitive Opportunities Regarding Electric Service,
Order Establishing Conditions for the Continuation and Transfer of Low-
Income Programs and Establishing System Benefits Charge Funding
Issued and Effective 30 May 2003

Submitted to the New York State Public Service Commission
February 1, 2004

February 2, 2004

Jaclyn A. Brillling
Secretary
State of New York
Department of Public Service
Three Empire State Plaza
Albany, New York 12223-1350

RE: NEW YORK PUBLIC SERVICE COMMISSION CASES 94-E0952 et al.- In the Matter of Competitive Opportunities Regarding Electric Service, Order Establishing Conditions for the Continuation and Transfer of Low-Income Programs and Establishing System Benefits Charge Funding, Issued and Effective 30 May 2003

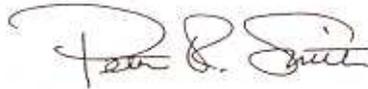
Dear Secretary Brillling:

The New York Energy Research and Development Authority (NYSERDA) is pleased to submit the enclosed low-income energy efficiency transition plan as described in the above referenced Order. The plan proposes that NYSERDA establish a comprehensive energy efficiency and energy-use management education program to accept referrals from Niagara Mohawk and New York State Electric and Gas (NYSEG) of low-income participants in ratepayer-funded payment assistance programs.

The proposed plan for the Low-Income Energy Affordability Program (LEAP) is the result of a collaborative planning process that includes representatives of the two utilities, the Department of Public Services (DPS), and NYSERDA. Implementation of this plan is expected to deliver energy efficiency services to an estimated 3,100 customers and energy-use management education to approximately 8,400 customers each year. NYSERDA looks forward to continuing the collaborative process with the utilities and DPS staff to complete the planning and implementation of this important effort to improve energy efficiency and energy-affordability for low-income households.

Questions related to this plan may be directed to NYSERDA's Director of Residential Energy Affordability Program, Rick Gerardi, at (518) 862-1090, ext. 3343.

Sincerely,



Peter R. Smith
President

cc: William Mills, DPS
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Low-Income Energy Affordability Program

A. Introduction

The Public Service Commission (PSC) in its Order of May 30, 2003 directed a plan be developed for the transfer of responsibility for the low-income utility programs supported by System Benefits Charge (SBC) funding from the Niagara Mohawk Power Company and the New York State Electric and Gas Company (NYSEG) to the New York State Energy Research and Development Authority (NYSERDA).¹ The plan presented below is the result of a collaborative planning process that included representatives of the two utilities, the Department of Public Service (DPS) and NYSEERDA.

The Commission directed “Staff and the utilities to work with NYSEERDA to develop a new coordinated low-income energy efficiency and weatherization program. Under such a program, NYSEG and Niagara Mohawk would refer customers that are receiving ratepayer-funded payment assistance to NYSEERDA for energy efficiency and weatherization services.” It continued, “Among the issues for consideration are the specific services currently provided by NYSEG and Niagara Mohawk that should be transferred to NYSEERDA, and approaches to effective coordination between NYSEERDA and the utilities.” The plan for a transition to NYSEERDA administration, due by February 1, 2004, “should address the feasibility and merits of expanding the new NYSEERDA program to all utility service territories.”²

The NYSEERDA Low-income Energy Affordability Program (LEAP) will provide energy-efficiency services and energy use management education to eligible low-income customers of Niagara Mohawk and NYSEG. A web-based referral system will be used to receive and track referrals. A key component will be developed from NYSEERDA’s current Weatherization Network Initiative program which will be modified to accept referrals from the Niagara Mohawk and NYSEG low-income programs and renamed LEAP. It will focus on cost-effective electric reduction measures, particularly lighting and refrigerator replacements. Other cost-effective electric-reduction measures will qualify as custom measures. Each year through June 2006, an estimated 3,100 customers will receive electric efficiency services and 500 customers weatherization services directly through this component.

Energy-use management education will be provided to approximately 8,400 customers per year through June 2006.³ Because behavior is key to realizing energy savings, on-site energy use education will be provided to the 3,100 customers receiving energy efficiency measures and 100 energy services workshops will be held throughout the service territories of the two participating utilities.

The annual LEAP budget will be \$5 million in SBC funds.

In addition, LEAP will coordinate services provided by several other NYSEERDA programs, including Assisted Home Performance with ENERGY STAR[®] and the Assisted Multifamily Program, both of which serve households with incomes up to 80% of the state median. The

utilities will have the opportunity to offer efficiency services to payment-troubled customers that are not currently being served by the utility programs. LEAP will thereby promote better coordination of utility and NYSERDA efforts for low-income consumers that the PSC Order envisioned. The cost of these coordinated programs are budgeted to SBC funds other than the LEAP budget.

B. Program Objectives

The following program objectives guided the development of this Plan:

1. Provide cost-effective energy efficiency measures with a focus on electric reduction for participants in the Niagara Mohawk and NYSEG low-income programs.
2. Provide energy use management education services and energy efficiency measure retrofits to at least the same number of customers currently being served by the utility programs.
3. Develop an effective referral mechanism to LEAP to target energy efficiency services to customers with high energy burdens.
4. Demonstrate that low-income energy efficiency services are effective from both a demand side perspective as well as an affordability strategy.
5. Provide efficiency services in a consistent and timely manner and insure the services are completed in accordance with accepted standards of quality.
6. Develop a network of energy service providers that can provide quality services in a timely manner.
7. Improve coordination of complementary low-income energy programs, including the Weatherization Assistance Program and the Home Energy Assistance Program, to maximize the resources available to customers.⁴
8. Adopt a “whole house/fuel neutral approach” as appropriate and within budgetary constraints to address affordability issues when services through the Weatherization Assistance Program cannot be accomplished within the time limits adopted by LEAP.
9. Improve efficiency of program administration to maximize resources available to serve more customers by substituting a single administrator for two.

C. Current SBC-Funded Utility Programs

The energy efficiency and weatherization services components of the Niagara Mohawk and NYSEG programs offer similar services and reach similar numbers of customers each year. There are dramatic enrollment differences however, as Niagara Mohawk’s Low-Income Customer Assistance Program (LICAP) has an annual enrollment target of 4,200 customers while NYSEG’s Power Partner program has an enrollment target of 22,500.⁵ However, the 22,500 number reflects on-going participation in the ratepayer-funded payment assistance program that receive a newsletter with a subset of these households receiving direct services.

The two tables below provide a summary of the direct services offered by the SBC-components

of the utility programs. The information presented for Niagara Mohawk is based on current performance data reported by the utility.⁶ The NYSEG information is based on the Power Partner program evaluation report submitted to the PSC for the period ended June 2002.⁷

Niagara Mohawk Low Income Customer Assistance Program (LICAP)	
Program Services	Estimated Number of Households Served Annually
Energy-Use Management Education 44% attend workshop and receive 3 CFLs and a night light (1,848) 56% receive affordability packet with energy-use management education materials, 3 CFLs and a night light (2,352)	4,200
Energy Efficiency Services and Weatherization Average investment is \$1,005 92% receive appliance efficiency services (1,196) 27% receive weatherization* (351) 19% receive both appliance efficiency services and weatherization (247)	1,300

* includes heating system service and repair

NYSEG Power Partner Program	
Program Services	Estimated Number of Households Served Annually
Financial Management/Energy Education 145 Workshops One-on-One Family Development	686 198
Energy Efficiency Services and Weatherization Average investment of \$1,197 includes an average of 1.8 measures 82% receive refrigerator replacements (1,462) 25% receive water heater replacement or conversions (455) 27% receive weatherization (495) 24% receive furnace clean and tune services (428) 21% receive other heating system measures (378)	1,787

D. Energy Efficiency Services

Electric reduction measures will include Compact Fluorescent Lamps (CFLs), hardwired fluorescent fixtures, refrigerator replacement, and custom measures, including but not limited to freezer replacement, domestic hot water heater conversion or replacement, clothes dryer conversion, and room air-conditioner replacement. Cost-effective retrofits will be identified using protocols developed by NYSERDA for the Weatherization Network Initiative. It is anticipated that 3,100 customers will receive electric reduction measures with an average investment of \$900 per customer for materials and installation.

Weatherization services through LEAP will include blower door-assisted air sealing, attic and side wall insulation, and heating system service and repairs. It is estimated that weatherization services will be provided to 500 households at an average cost of \$1,200 for the weatherization services. These households will also receive electric reduction measures when appropriate.

Low-Income Energy Assistance Program (LEAP)	
Program Services	Estimated Number of Customers Served Annually
Energy-Use Management Education 100% receive energy-use management education materials and CFLs.	8,400
On-site Energy-Use Management Education	3,100
100 Energy-Use Management Workshops	1,000
200 Financial Management Workshops ¹	1,000
Energy Efficiency Services and Weatherization Average investment of \$1,418 ²	3,100 ³

¹ Financial management workshops will be funded by NYSERDA from sources other than LEAP.

² Includes pro-rated share of program implementation, administration and evaluation costs.

³ Assumes all 500 receiving weatherization services also receive electric reduction measures to avoid potential over count of customers served.

E. Energy-Use Management Education

The estimated 8,400 customers to be referred by the utilities to LEAP will receive energy-use management education designed to make these customers more informed energy consumers and enable them to change usage behaviors thereby lowering overall energy use and cost.

An energy-use management education packet with educational materials, a calendar with energy tips, and compact fluorescent lamps will be sent to all customers referred by the utilities. It is expected that there will be no more than a 10 business day turnaround for the fulfillment of the energy-use management education packets. The energy-use management education will stress that implementing energy savings measures and energy saving behaviors can lower use and

overall costs.

Up to 100 energy-use management workshops will be conducted by the program throughout the service territories of the participating utilities. LEAP participants will be notified of their availability, the potential benefits of attending, and information on how to make reservations for attendance. NYSERDA will access other funding resources to deliver financial management workshops to participants in LEAP.

On-site energy-use management education will be conducted in the home by a member of the energy efficiency services contractor team specifically trained for such purpose at the time that the efficiency services are being delivered.

F. Delivery of LEAP Services

NYSERDA will competitively select a statewide implementation contractor to manage referrals and the delivery of energy efficiency services through energy services contractors. The implementation contractor will review and approve all proposed work scopes, monitor delivery of services for timeliness and quality, and approve payment of invoices for services delivered. The implementation contractor will be responsible for delivery of the energy-use management education, either directly or through subcontractors. The implementation contractor will provide quality assurance and quality control for all aspects of the program, including training of energy services contractors, site inspections of a sample of completed projects, and problem resolution. A flowchart showing the major milestone activities in LEAP is provided as Attachment A.

NYSERDA anticipates using the Community-Based Organizations (CBOs) currently participating in its Weatherization Network Initiative and participating Home Performance contractors for delivery of energy efficiency services. The Weatherization Network Initiative targets homes that were weatherized before the federal WAP rules permitted electric efficiency measures. Home Performance with ENERGY STAR offers comprehensive assessment of a home and its energy using systems. All testing and corrective work is done by a Building Performance Institute-certified home performance contractor. The CBO capacity in the service delivery areas of Niagara Mohawk and NYSEG includes 8 Regional Implementors with 38 team members. (See Attachment B.) Currently, there are 127 BPI accredited firms participating in Home Performance with ENERGY STAR. This number includes all eight of the regional implementors and 37 team members.

Following receipt by the LEAP implementation contractor of a utility customer referral and after identifying appropriate electric reduction measures as described in Section G, the preferred implementation strategy calls for the implementation contractor to make a referral to the CBO Regional Implementor. If the CBO can provide the services in the agreed to service window, the CBO will prepare a work scope proposal for review and approval by the LEAP implementation contractor. If services cannot be provided within the agreed to service window, the LEAP implementation contractor will request a work scope proposal from a private home performance contractor. The proposed work scope will be reviewed and approved by the LEAP implementation contractor prior to the installation of proposed measures.

Households that may benefit from weatherization services will be referred to the federally-funded Weatherization Assistance Program (WAP). Our preference is that weatherization services are delivered by WAP as this program offers the best opportunity to provide comprehensive services. We will explore opportunities for coordination of LEAP and WAP with the New York State Division of Housing and Community Renewal. NYSERDA also will explore implementing the electric reduction measures as a coordinated activity under WAP. If weatherization services are provided by WAP without contribution of LEAP funds, LEAP services will be provided to additional customers. We also recognize that waiting lists for WAP may prevent service within the 90-day timeframe adopted by LEAP, so in the event that the WAP agency cannot commit within 10 days of the customer referral to deliver the services within 90 days, NYSERDA will take steps necessary to provide the weatherization services through LEAP.

Income-eligible households living in rental housing are eligible to receive services if the landlord agrees not to raise the rent based on the energy efficiency improvements made by the program. A requirement for a landlord contribution to the cost of the project will be considered to ensure that program benefits accrue primarily to the income-eligible household. If a project is implemented as a coordinated activity with WAP, LEAP will follow the WAP rule on landlord contributions. In all other instances, landlord contributions will be dependent on the measures installed and an assessment of the tenant benefits.

A staff position will be created by NYSERDA to oversee and coordinate the program.

G. Utility Customer Referrals

NYSERDA will establish a web-based system to receive and track customer referrals from NYSEG and Niagara Mohawk low-income programs. Appropriate levels of access to the data base will be provided to staff of the utilities, NYSERDA, DPS, the implementation contractor, and the energy services contractors. These parties will be able to access the database for all significant milestones, including the date the energy use education package is sent, the date energy efficiency measures are completed, and the measures installed.

The customer referrals will be made on an ongoing basis within the agreed upon parameters, reflecting the annual budget and service targets presented in Section J below, with customers of each utility receiving approximately equal shares of all services. The customer referral from the utility will include the customer's name, address, and annual energy usage.

Upon receipt of the utility referral, the LEAP implementation contractor will send an energy services questionnaire with a cover letter explaining the possible availability of free energy efficiency services to all customers referred by the utilities. In addition, the implementation contractor will send the energy use education packet to all households referred by the utilities. Responses to the energy services questionnaire and energy usage will be used to prioritize households for receipt of energy efficiency services. Priority will be given to households where efficiency improvements will have the biggest impact on energy affordability and comfort.

Information on the customer referral and key milestones will be entered into the web-based tracking system. Energy efficiency services will normally be provided within 90 days from assignment to the energy services contractor.⁸

NYSERDA will conduct outreach to county Offices for the Aging (OFA) for referral of low-income seniors to LEAP. The parameters of such referrals from OFA will be established in coordination with the utilities to ensure that the core customers continue to be served. All LEAP referrals from County Offices for Aging will include a certification of HEAP eligibility and a completed energy services questionnaire.⁹ The LEAP implementation contractor will enter referrals from OFAs into the LEAP database and screen the referrals to determine if energy efficiency services are appropriate. Seniors referred to an energy services contractor will also receive an energy-use management education packet and will be included in the totals served through LEAP as if referred by the utilities. The implementation contractor will provide notice to the utility of the enrollment in LEAP of households referred by OFA so the utility can follow-up with other services as appropriate. NYSERDA's outreach to OFA will include instruction on accessing other **New York Energy \$martSM** programs, such as Assisted Home Performance with ENERGY STAR, for seniors with income above the HEAP limits. Referrals for other **New York Energy \$martSM** programs will be tracked and reported separately from LEAP.

Referral activities that both utilities share include:

1. Screening of program participants to identify potential referrals to LEAP.
2. Informing program participants of the availability of energy services through the NYSERDA LEAP program and explaining the benefits of these services as well as their relationship to utility payment arrangements.
3. Explaining to customers what to expect with regard to forthcoming information from NYSERDA regarding potential LEAP energy efficiency services.
4. Obtain customer's permission to forward energy usage data to LEAP program.
5. Execute actual transferral of pertinent customer utility data.
6. Manage customer calls to utility regarding:
 - status of LEAP energy services delivery
 - scheduling of LEAP energy services delivery activities.
7. Track and perform follow-up tasks regarding LEAP program services delivered, including readjusting the customer payment arrangement to reflect projected use and cost savings.

The proposed budget includes \$200,000 to cover the estimated incremental costs associated with the utility referrals. DPS staff will review the utility's cost estimates for the referral services and make its recommendation on funding at the time it presents this proposed plan to the PSC.

Utility customer referrals to LEAP will commence on July 1, 2004. All projects referred to contractors for services by the utility programs prior to July 1, 2004 will remain the responsibility of the utility that initiated the projects under the current SBC funding allocation. In the event that the LEAP implementation contractor is not in place and ready to accept referrals on July 1, 2004, NYSERDA staff will provide this service on an interim basis. The network of energy services contractors are in place now and will be ready to provide LEAP services

beginning July 1, 2004.

H. Expansion to All Electric Utility Service Territories

Current plans are to launch LEAP services in the NYSEG and Niagara Mohawk service territories July 1, 2004. NYSERDA will assess the efforts under this program, and based on the results, may include funding for a statewide effort in its proposal for SBC 3. The primary constraint on expansion before that time to the remaining utility service territories is that NYSERDA's available SBC funding is fully committed to current programs.

I. Evaluation

NYSERDA's evaluation of **New York Energy \$martSM** programs provides objective, policy relevant information on the impact of the programs. Plans will be made to track, monitor, assess, and report on LEAP as part of NYSERDA's ongoing evaluation activities. NYSERDA's team of independent evaluation contractors will provide evaluation oversight, and assistance in developing tracking indicators and providing appropriate analysis.

Following the end of the first year of the program NYSERDA will host a meeting of representatives of DPS, the utilities, the LEAP implementation contractor, and the participating energy services contractors to review the program and consider modifications based on lessons learned. Among the issues to be considered will be the effectiveness of the energy use education workshops.

J. Annual Budget

Electric Reduction Measures	3,100 households @ \$900 /household	\$2,790,000
Weatherization	500 households @ \$1,200/household	600,000
Energy-Use Education Packets	8,400 households @ \$25/household	210,000
On-Site Energy-Use Education	3,100 households @ \$50/household	155,000
Energy Use Education Workshops	100 workshops @ \$750 each	75,000
Utility Referrals		200,000
Implementation Contractor		520,000
NYSERDA Administration/Evaluation		<u>450,000</u>
		\$5,000,000

Potential Additional Services

In addition to the above services that will be delivered with the \$5 million annual LEAP budget, NYSERDA is committing to the delivery of additional services to low-income utility customers through other SBC programs. Assisted Home Performance with ENERGY STAR, which serves households with incomes up to 80 percent of the state median, will provide the utilities with the means to serve payment troubled customers that are currently ineligible for services. The Assisted Multifamily Program will provide the utilities with the means to offer energy services to customers in multifamily buildings that are also currently unserved by the utility programs.

Finally, NYSERDA is committing to offering financial management workshops that will build on the energy use management workshops that will be funded under LEAP. Financial management education workshops are currently part of the NYSEG program, but not Niagara Mohawk's. The Niagara Mohawk representatives recommended that LEAP focus on energy use management. NYSERDA believes this is appropriate, but also sees an opportunity to offer the financial management workshops with other funding. Cornell Cooperative Extension was a major part of the delivery system for the NYSEG financial management education. NYSERDA has an existing relationship with more than 30 Cornell Cooperative Extension offices across the state and is interested in exploring adding financial management education as a funded activity. In addition, NYSERDA is exploring the possibility of offering financial management education through community-based participating lenders in the **New York Energy SmartSM** Loan Fund as part of a strategy to extend low-cost financing for energy-efficiency improvements to households with credit scores below those accepted by traditional lenders.

Value Added from Other SBC funds:

Assisted Home Performance with ENERGY STAR - 200 homes @ \$3,500	\$ 700,000
Assisted Multifamily Program - 500 units @ \$1,000	500,000
Financial Management Workshops - estimated 200 workshops	<u>100,000</u>
	\$1,300,000

K. Program Benefits

It is anticipated that implementation of LEAP will result in the following benefits:

1. Energy efficiency services to an estimated 3,100 households each year through the LEAP budget.
2. Energy use education will be provided to 8,400 households with 3,100 receiving on-site energy use education at the time of the efficiency services and 100 workshops to emphasize the importance of behavior to energy savings.
3. A more effective administration and coordination of program services achieved by consolidating administrative functions will provide for maximum resources for serving the greatest number of customers.
4. Targeting of energy efficiency services to customers with high energy burdens will improve the energy affordability for those most in need.
5. The development of an experienced and effective service provider network across the two utility service territories.
6. Offer an effective model for potential expansion of services to other utility service territories in New York State.
7. Better coordination of services with an additional 700 households offered energy efficiency services through other SBC funds.

Based on NYSERDA's experience in similar programs, average annual energy savings of 1,500 kilowatt hours per household are anticipated for the electric reduction measures. Average annual

energy savings for households receiving weatherization that use fossil fuel for heating are estimated at 15 MMBtu. Annual cost savings for households receiving the electric reduction measures are estimated to average \$195, while weatherization is estimated to save an average of \$181 (annual cost savings based on 13 cents per kilowatt hour average residential cost for electricity and \$12.07 per million Btu for home heating fuel).¹⁰

L. Timeline/Milestones

The following timeline with tasks and milestone dates was adopted by the planning team members early in the planning process to guide development of the plan presented above. The timeline accurately portrays the major planning steps completed through the date of plan submission and future milestone dates remain unchanged with the exception of Task 15. The date for release of a Request for Proposals for the statewide program implementation contractor has been moved up to February with proposals due in mid-April and contractor selection in May 2004.

<u>Task</u>	<u>Projected Timeframe</u>
1. Conduct information meetings with NMPC & NYSEG	September/October 2003
2. Develop project timeline/milestones; draft proposal outline	October
3. Determine program referral mechanisms	November
4. Determine energy use management/budget counseling education component	November
5. Determine program services to be provided, investment levels, Service providers for impacted regions	December
6. Draft program proposal and budget	January 2004
7. Obtain NMPC & NYSEG comments on program proposal	January
8. Revise proposal as necessary based on comments received	January
9. Submit program proposal to PSC	February 1, 2004
10. PSC distributes proposal for public comment	February/March
11. Conduct meetings with proposed service delivery provider network to solicit participation and commitment to program	February
12. Design service delivery procedures, forms, information systems, reporting, etc.	February thru mid-April
13. Design program referral mechanisms with NMPC & NYSEG	February thru mid-April
14. PSC consideration of proposal	cir. mid-April to early May
15. Issue as necessary requests for proposals and award contracts	

or negotiate letters of agreements with contractors to be associated with program	mid-April thru May
16. Complete all required program staffing commitments	May
17. Conduct service delivery provider network training for referral procedures, energy efficiency services, and EUM education	May/June
18. Final date for referral to utility program services	June 30, 2004
19. Initiate referral to NYSERDA program services	July 1, 2004

ENDNOTES

1. Cases 94-E0952 *et al.*, *In the Matter of Competitive Opportunities Regarding Electric Service*, Order Establishing Conditions for the Continuation and Transfer of Low-Income Programs and Establishing System Benefits Charge Funding, (issued and effective 30 May 2003)
2. *Id.*, page 17.
3. The 8,400 customers per year that are to receive energy-use management education accommodates the 4,200 receiving these services in the Niagara Mohawk program and offers the same capacity to NYSEG.
4. NYSERDA will meet with representatives of the New York State Division of Housing and Community Renewal to discuss coordination of services under the Weatherization Assistance Program. It will also explore with the Office of Temporary and Disability Assistance plans to access HEAP funds for emergency furnace repair and replacement.
5. The 4,200 for Niagara Mohawk and 22,500 for NYSEG reflect PSC approved regulatory targets for ratepayer-funded payment assistance.
6. *Low-Income Customer Assistance Program (LICAP) Evaluation- Final Report*, prepared by Roper ASW for Niagara Mohawk, August 2002. The Niagara Mohawk figures in the report were adjusted to reflect the most recent months of program activity as reported by Niagara Mohawk staff.
7. *NYSEG Power Partner Program Evaluation Report*, September 2002.
8. NYSEG has successfully coordinated delivery of comprehensive energy services through WAP agencies by relaxing the timeframe for delivery of services. NYSERDA will consider continuing this practice if it is the best way to meet customer needs.

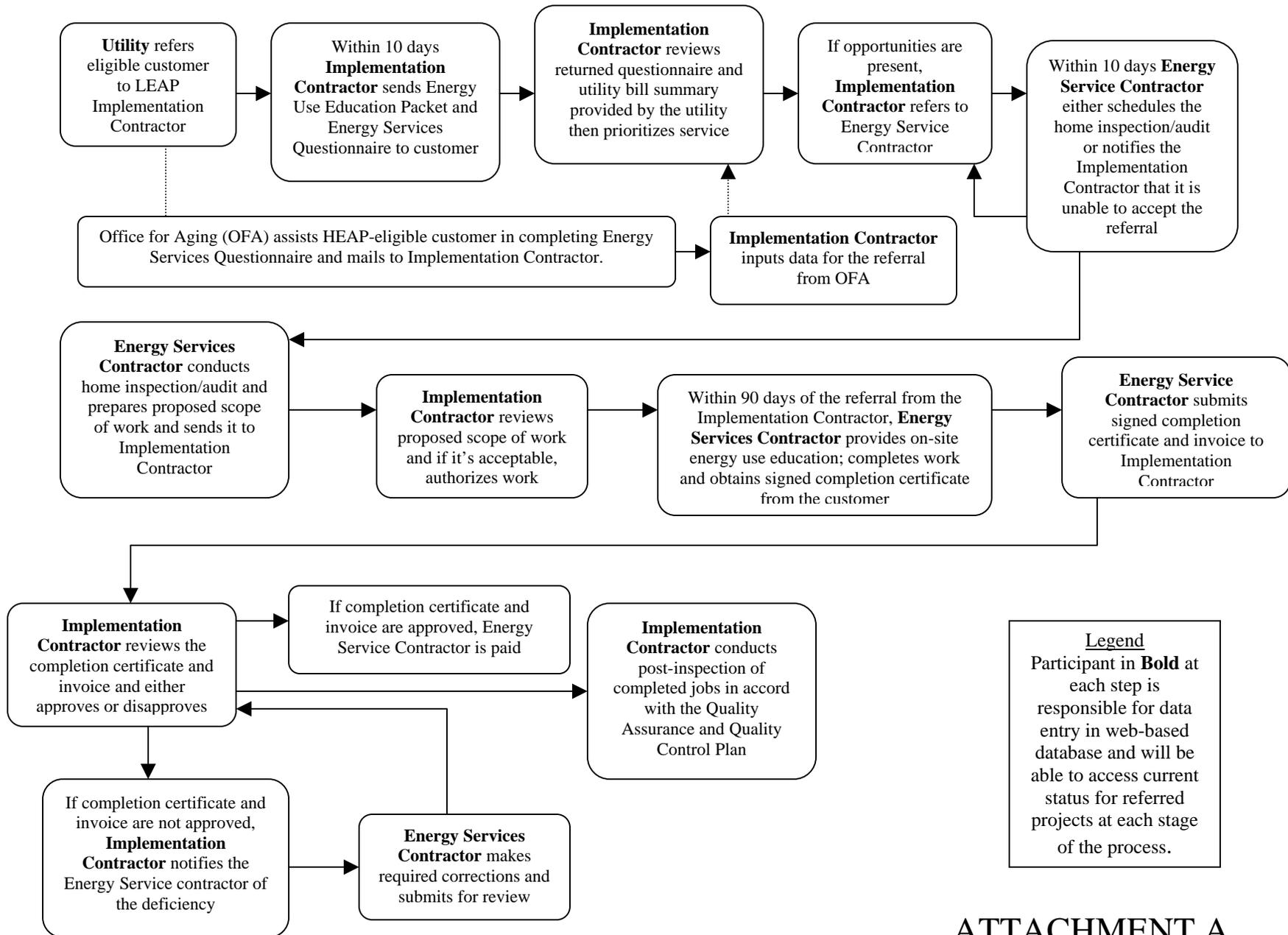
9. NYSERDA will work with NYSEG to enable OFA referrals of NYSEG customers that meet the Power Partner eligibility guidelines that include households with incomes up to 200% of federal poverty guidelines.

10. NYSERDA's Energy Analysis staff provided average residential electricity prices for the two utilities for June 2002 and January 2003 and average residential fuel prices for 2003:

- \$1.59 per gallon (\$11.43 per million Btu) for home heating oil
- \$13.05 per thousand cubic feet (\$12.72 per million Btu) for natural gas

The \$12.07 used to calculate savings assumes a 50/50 fuel mix of home heating oil and natural gas.

Low-Income Energy Affordability Program (LEAP) Process Flowchart





LEAP Network Team Leaders

Finger Lakes/Genesee
Action for a Better Community, Inc.

Western New York
Cattaraugus Community Action, Inc.

Southern Tier
Performance Systems Development, Inc.

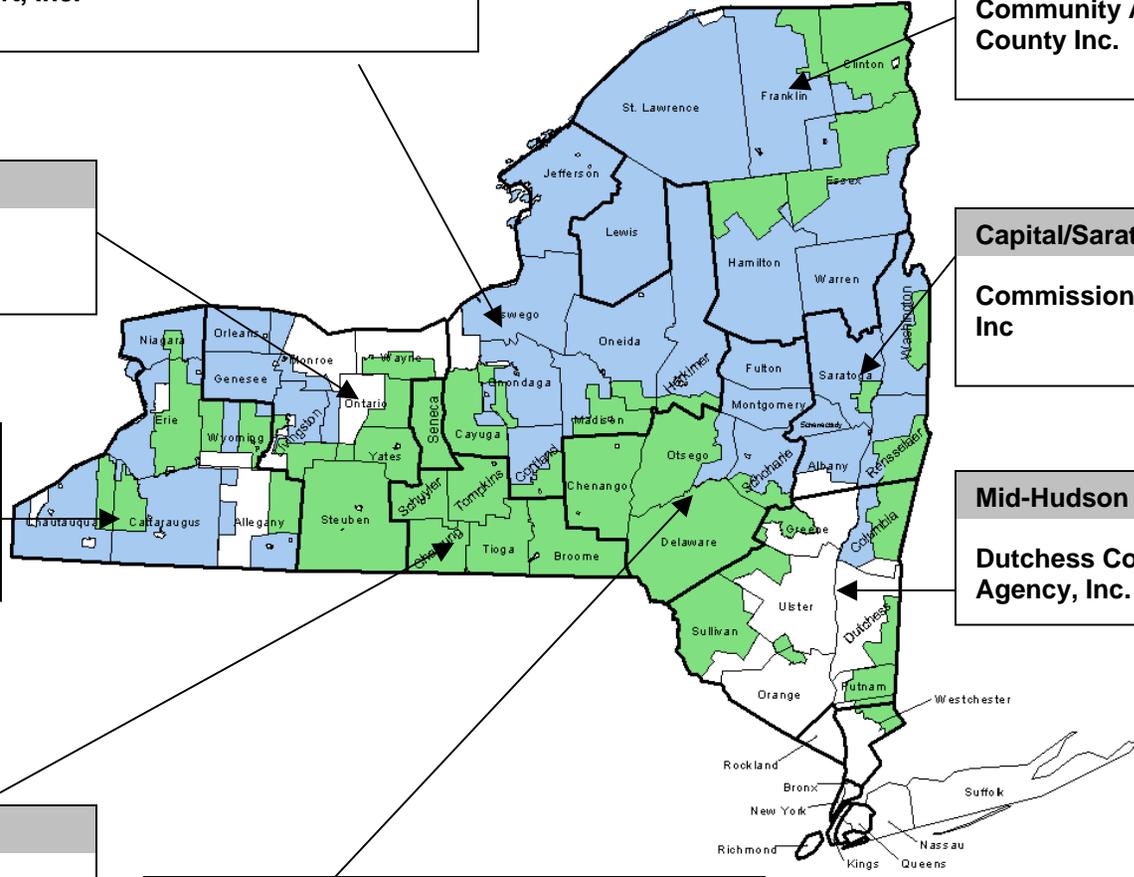
Central New York
People's Equal Action and Community Effort, Inc.

Catskills
Opportunities for Otsego, Inc.

North Country
Community Action Agency of Franklin County Inc.

Capital/Saratoga
Commission on Economic Opportunity, Inc.

Mid-Hudson
Dutchess County Community Action Agency, Inc.



Niagara Mohawk

New York State Electric and Gas