

## Low-Income Needs Assessment Presented Jun 27

July 6, 2022

### **QUESTION: HOW DOES THE LOW-INCOME DEFINITION USED FOR THE ANALYSIS (200% OF FPL) COMPARE TO 60 OR 80 PERCENT OF AREA MEDIAN INCOME (AMI)?**

*Response:* As noted during the presentation, AMI varies by location. [AMI for all metropolitan areas and non-metropolitan counties](#) are published by the U.S. Department of Housing and Urban Development. Households at 60 percent of AMI or lower would also fall within 200 percent of the Federal Poverty Level (FPL). Generally, 80 percent of AMI is higher than 200 percent of FPL. In some cases, Consumers Energy allows customers with income up to 80 percent of AMI to participate in their income qualified programs, including any collaboration with Habitat for Humanity or in Oakland or Muskegon County.

### **QUESTION: ARE MULTIFAMILY COUNTS SHOWN UNITS OR BUILDINGS?**

*Response:* Multi-family counts are buildings.

### **QUESTION: WHAT DOES IT MEAN TO BE A SERVED HOUSEHOLD?**

*Response:* For Consumers Energy, all participation from 2010 to 2020 in the income qualified initiatives were reviewed, including:

- Phase One Initiative (which includes an assessment and measure installation)
- Premium Measures Initiative
- Manufactured Home Initiative
- Cold Climate Heat Pump Pilot
- Food Banks
- Kit Distribution

However, for the purposes of the maps included in the presentation, Consumers Energy did not include the Food Banks and Kit Distribution programs in our definition for served households, as the measures provided through those programs provide only a portion of the savings the other, whole-home programs provide.

## **QUESTION: HOW DO THE MAPS ALIGN WITH HISTORICAL REDLINING?**

*Response:* This analysis was done for DTE, but not for Consumers Energy. The analysis conducted for DTE found that there was substantial overlap between the areas that were redlined and the areas identified based on the variables of need (e.g., income, race, ethnicity, language) considered.

## **QUESTION: HOW DOES THE DEFINITION OF WEATHERIZATION USED IN THE PRESENTATION COMPARE TO THE DEPARTMENT OF ENERGY WEATHERIZATION ASSISTANCE PROGRAM (DOE WAP) DEFINITION?**

*Response:* Consumers Energy's program installs or offers rebates for many of the same measures promoted through the DOE WAP. It is notable some weatherization providers (Community Action Agencies (CAAs) and other community-based organizations) actively apply for rebates available for weatherization measures, while others do not participate at all.

## **QUESTION: COULD DOE WAP PARTICIPATION INFORMATION BE INCLUDED TO IDENTIFY HOME SERVED?**

*Response:* That would be possible but would require that data be provided by DOE or CAAs.

## **QUESTION: DOE DEFINES ELDERLY AS 60 YEARS OR OLDER AND CHILDREN AS UNDER 19. HOW WOULD THAT IMPACT THE ANALYSIS?**

*Response:* While expanding the definition of elderly to those 60 years or older would expand the number of eligible or targeted households, the senior citizens are defined as "a provider customer who is 65 years of age or older" [Michigan Public Service Commission Billing Rules](#). Consumers Energy (and DTE) believe that 65 years of age or older is the appropriate threshold for this analysis. The DOE definition for children (under 19) would also expand the number of eligible or targeted households compared to what was included in this analysis (under 18).

## **QUESTION: IS THE HOUSEHOLD ENERGY BURDEN ONLY HEATING ENERGY BURDEN OR TOTAL ENERGY BURDEN?**

*Response:* The calculation of energy burden includes all types of fuel that could be used within a household (natural gas, electric, or delivered fuels). The calculation is the total cost for all fuels divided by household income.

**QUESTION: IS IT POSSIBLE FOR US TO GET ACCESS TO THESE MAPS AND THE DATA BEHIND THEM?**

Response: Due to customer data security requirements and concerns, we are not able to share the underlying data.

**QUESTION/COMMENT: IF THIS DATA IS INTENDED TO LEVERAGE STATE AND FEDERAL FUNDING AND RESOURCES, TRANSPARENCY WILL BE CRITICAL.**

Response: The [settlement agreement](#) in Consumers Energy's most recent Energy Waste Reduction Plan filing U-20875) states that as part of its Flint initiative, Consumers Energy should work with "*supporting partner agencies and/or contractors working in Flint in identifying place-based, or other, opportunities to leverage funding from other federal, state, and/or private sources.*" Consumers Energy intends to work with other agencies to ensure that there is a minimum of redundancy and duplication and that where possible, funding from multiple sources would be used to provide more comprehensive services.