BEFORE THE GEORGIA PUBLIC SERVICE COMMISSION
STATE OF GEORGIA

IN RE:	)	
	)	
UNIVERSAL SERVICE FUND	)	
GRANT PROGRAM TO ASSIST	)	**DOCKET NO. 12897**
LOW-INCOME SENIOR	)	
CITIZENS AND OTHER LOW-	)	
INCOME CITIZENS		

THE SALVATION ARMY UNIVERSAL SERVICE FUND PETITION FOR EMERGENCY HEATING ASSISTANCE
Years 2024 - 2026

November 3, 2023

Sallie Tanner
Executive Secretary
Georgia Public Service Commission
244 Washington Street
Atlanta, Georgia 30334

Subject: **Docket No. 12897: Salvation Army Universal Service Fund Emergency Heating Assistance Years 2024 - 2026**

Dear Ms. Tanner,

Please find enclosed an original of the Joint Petition to the Georgia Public Service Commission ("Commission") from The Salvation Army Georgia Division ("The Salvation Army") for Emergency Heating Assistance from the Universal Service Fund ("USF") for years 2024 - 2026.

I. Background

At its Administrative Session on October 2, 2001, the Georgia Public Service Commission ("Commission") created a grant program to assist low-income senior citizens and other low-income citizens that were customers on Atlanta Gas Light Company's ("AGL") natural gas distribution system. The Commission found that such a program was necessary because a large number of low-income senior citizens and other low-income citizens were having difficulty paying their natural gas bills. Many such customers were disconnected from natural gas service for unpaid bills. The Commission is authorized to use funds from the USF in order to assist low-income residential consumers in times of emergency. O.C.G.A. § 46-4-161(a)(3). The General Assembly left the determination of "emergency" to the Commission's discretion.

II. The Salvation Army Project Share Background

The Salvation Army created the Project SHARE program in 1985 to serve those in need in Georgia, and today it is our primary resource for emergency family assistance throughout the state. Qualified families experiencing a financial crisis that threatens their health, safety or stability of the home receive relief that often prevents utility cut-off or eviction. The Salvation Army's 40 locations across Georgia directly touch more than 80% of Georgia's population and dozens of partner agencies are available to serve the remaining areas. SHARE is one of the most successful privately funded utility assistance programs in the United States, providing more than $2 million in aid to nearly 15,000 Georgians each year. Since our original partnership began with Georgia Power, SHARE has provided more than $80 million for utilities and housing across the state.

On February 3, 2011, the Commission approved The Salvation Army with USF funding to assist low-income natural gas customers on AGL's distribution system through its Project Share program. In 2015 and 2019, The Salvation Army participated in filing a Joint Petition with the Heating Energy Assistance Team ("HEAT") and HopeWorks in seeking USF low-income assistance funding. On July 22, 2019 the Commission approved a Joint Petition from the HEAT, HopeWorks and The Salvation Army for USF low-income funding that would increase its natural gas energy assistance to $750,000.

III. Project Share USF Funding Accomplishments

Since 2011, the Commission has approved $2,177,000 in USF low-income assistance funding for. As of the end of July 2023, the remaining balance is $28,937. Since 2011, The Salvation Army have been good stewards of USF grant funding by distributing $2,148,063 and helping 9,330 low-income households that are AGL and gas marketer customers. The support is paid directly to the natural gas marketer to maintain service. The Salvation Army also provides a general assessment to natural gas program clients that determines whether other available Army services may be necessary or useful to address their situation. Our goal is to stabilize necessary services including housing and to hopefully provide a sustainable outcome for the household going forward. The 2016-2018 three-year average for expenditures was $115,600. Besides The Salvation Army's Project Share helping to keep natural gas service for low-income ratepayers, Project Share provides a positive financial impact to AGLC and the natural gas marketers. With each low-income ratepayer that has received

Project Share assistance, an AGLC customer and a natural gas marketer's customer was able to keep natural gas service. Otherwise, these low-income Residential customers would have dropped off the system reducing AGLC's revenues and the revenues of the natural gas marketers. Similarly, the services provided by H.E.A.T. and HopeWorks help to keep customers on the system.

IV. USF Funding Request

The Salvation Army requests continued USF funding in the amount of $1,320,000 for the reminder of 2023 to the end of 2026 with the following.

1. The USF disbursement will take place in October of each year ahead of the winter heating season with the following schedule.

    i. 2024 Disbursement in October 2023: $440,000
    ii. 2025 Disbursement in October 2024: $440,000
    iii. 2026 Disbursement in October 2025: $440,000
    Total Funding: $1,320,000

2. The USF disbursement will provide a 10% administrative fee to help govern the program. The 10% admin fee dollar amount will be provided upfront to The Salvation Army upon receipt of the USF disbursement. The remainder of the funds will provide direct support to any low-income natural gas customers on AGL's distribution system. With a $440,000 USF disbursement each year, the admin fee will be $44,000.

V. The Salvation Army Program Scope

The Scope of The Salvation Army energy assistance using USF funds is provided below.

1. The participant must be a Residential AGLC natural gas customer served by a marketer.

2. Total gross yearly household income is at or below 200% of the Federal Poverty Guidelines:

2023 SHARE/PSC Low-Income Guidelines	
# of People in Home	Maximum Household Income
1	$29,160
2	$39,440
3	$49,720
4	$60,000
5	$70,280
6	$80,560
7	$90,840
8	$101,120
more	+ $10 280 each

3. Applicant is named on the utility bill or is authorized on the account and resides at the service address.

4. Applicant demonstrates financial crisis and also owes a past due balance and/or is disconnected.

5. The maximum percentage of administration fees charged is 10% for each disbursement.

6. The annual limit for USF assistance is $500 per household.

VI. The Salvation Army Target Outcomes

The Salvation Army target outcomes and objectives are provided below.

1. To address the immediate threat to natural gas service or to reestablish service. To provide peace of mind for household occupants as well as safely assuring daily necessities associated with heating, cooking and hygiene.

2. To evaluate the circumstances of the financial crisis and determine whether other actions are necessary utilizing wrap around services leading to longer term stability for the client.

3. To leave the natural gas account in good standing.

4. To serve up to an additional 500 households with natural gas assistance annually.

VII. The Salvation Army Monthly Reporting

The Salvation Army will continue to file monthly reporting as approved in the 2015 Joint Petition. The Salvation Army files the previous month's activity by the 15th of the following month. The reporting allows the Commission to review and confirm The Salvation Army's good stewardship of USF funds. The following attachments are currently required as part of the reporting:

1. Monthly Filing Cover Sheet
2. Attachment I (Summary)
3. Attachment II (Excel Analysis)
4. Attachment III (Distribution)