



RIVERSIDE PUBLIC UTILITIES

Board Memorandum

BOARD OF PUBLIC UTILITIES

DATE: NOVEMBER 17, 2025

SUBJECT: PUBLIC BENEFITS LOW-INCOME PROGRAM INCOME VERIFICATION PROCESS

ISSUE:

Consider receiving and filing an overview of Public Benefits Low-Income Program Income Verification Processes.

RECOMMENDATION:

That the Board of Public Utilities receive and file an overview of Public Benefits Low-Income Program Income Verification Processes.

LEGISLATIVE HISTORY:

State law, dating back to the early 1990's, stated that local publicly owned utilities (POUs) provide assistance to low-income customers through energy efficiency programs, specifically for weatherization and other assistance (Public Utilities Code, Section 9500). In response to these requirements and prior to the State's restructuring of the electric systems and markets in California under Assembly Bill (AB) 1890 in 1996, POUs have provided low-income assistance and energy efficiency programs.

Assembly Bill (AB) 1890 (Brulte, 1996) not only restructured the electricity markets in California but it also reinforced the State's direction in relation to low-income utility customer support and established a requirement that 2.85% of electric revenue be utilized to fund public benefits programming. Funding was required to be used in four areas: demand side management (energy efficiency), renewable energy, low-income assistance, or research, development, and demonstration.

In 2000, Senate Bill (SB) 1939 (Alarcon) added the requirement that POUs, which had not implemented targeted energy efficiency programs and rate discounts for low-income electricity customers, prepare a needs assessment for those customers and required them to consider increasing the level of discounts or raising eligibility levels to reflect customer need. POUs were also required to streamline enrollment and to establish participation goals.

SB X 2-2 (Alarcon, 2001) required POUs to streamline their enrollment for low-income programs by collaborating with existing providers for the Low-Income Home Energy Assistance Program (LIHEAP) and other electric or gas providers within the same service territory. It further required

that POUs consider increasing the level of discount or raising eligibility levels for rate assistance programs to reflect customer need.

BACKGROUND:

On March 10, 2025, the Riverside Board of Public Utilities (Board) requested a presentation on how income is verified for customers who apply for and are granted support through RPU's low-income programs. This report addresses this question. To provide context for income qualification process, a brief overview of RPU's low-income programs is provided prior to the discussion of the income verification process.

Riverside Public Utilities (RPU) began providing assistance programs to qualified, low-income customers in the late 1980's. Currently, RPU offers two low-income programs. The primary program, implemented in 1989, is the Sharing Households Assist Riverside's Energy program (SHARE), which helps customers experiencing utility deposit, urgent notice and bill difficulty was implemented in 1989. Customers qualify for a monthly bill rebate for electric, water, and sewer services and may qualify for emergency or deposit assistance. The second program, implemented beginning in 2012, is the Energy Savings Assistance Program (ESAP) which is a direct install program that provides customers, at no cost to the customer, with appliance upgrades, tune-ups and devices to make their homes more energy efficient and helps to lower electric bills. ESAP is a collaboration with Southern California Gas Company (SoCal Gas) as the natural gas utility provider for the City of Riverside.

Both SHARE and ESAP are income-qualified programs intended to serve low-income customers. They have the same income qualification threshold of 250% of federal poverty guidelines which roughly align with the State low-income thresholds (80% and below of area median income) set by the California Department of Housing and Community Development. These thresholds are revised annually and are based on a combination of income and household size. The income thresholds for the current fiscal year are shown in the following table:

Number in Household	Total Annual Income Does Not Exceed	Total Monthly Income Does Not Exceed
1	\$39,125	\$3,260
2	\$52,875	\$4,406
3	\$66,625	\$5,552
4	\$80,375	\$6,697
5	\$94,125	\$7,843
6	\$107,875	\$8,989
7	\$121,625	\$10,135
8	\$135,375	\$11,281

For each additional person add:

Total annual Income: \$13,750

Total monthly Income: \$1,145

Program Participation

Over 30% of Riverside's households may be eligible for RPU's low-income programs based on the population of Riverside for which poverty is determined. Households and families are proxies

to the number of residential customers that may be eligible.

Riverside Population Data	Population	Number Below 250% FPG	Percentage Below 250% FPG
Population determined in poverty	299,549	118,001	39%
Households	91,110	31,710	35%
Family Households	66,568	22,036	33%
Non-Family Households	24,542	9,674	39%

Source: U.S. Census Bureau Data; American Community Survey 2021 and included in the RPU 2023 IRP

RPU's assistance programs see a far lower participation rate than the potential 31,710 households that could potentially qualify for RPU's SHARE program. On average, about 5,900 customers per year receive SHARE assistance, or 19% of potentially qualified customers. This could be attributed to several factors including lack of access to programs, social stigma or difficulty in obtaining the required documentation to apply.

DISCUSSION:

As previously outlined, SHARE and ESAP are both income-qualified programs and the same income threshold of 250% of federal poverty guidelines applies to both programs. This means that if customers apply for one program and are approved, they will automatically qualify for the other program if they wish to participate.

To streamline assistance and meet the requirements established by State law, the City entered into an agreement with the County of Riverside Department of Public Social Services – Department of Community Action Partnership (CAP) on July 1, 1999, to assist with administering some program applications and performing customer income verification. On June 11, 2024, the City Council approved a first amendment to the agreement between RPU and CAP to continue this collaboration with extension options through June 30, 2029. CAP assists RPU customers by processing applications in alignment with RPU's SHARE program policy, while helping them to access other State, County and Federal assistance programs from a single location. Between 1999 and 2018, all income verification was performed by CAP. Currently, approximately 10% of all SHARE applications are processed by CAP, while the majority are processed in-house by staff at RPU's Customer Resource Center.

The qualification criteria are applied consistently whether at CAP or by RPU staff. All applications must be accompanied by the correct, valid documentation to be processed. Applications that do not have the correct documentation are rejected. RPU has not tracked all denied applications since customers who do not qualify most often do not leave their documentation with RPU and often take application materials with them. The information provided is sensitive and there is no need for RPU to keep it. Additionally, many customers do not finalize their applications if they review the qualification information or discuss it with staff and determine they do not qualify on their own. Regardless, RPU staff denies about 10-15 applications per month.

As part of the application (attached for reference), customers must sign a statement, on penalty of perjury, that the information they are submitting is accurate. This statement reads:

I certify under penalty of perjury that all information herein is true and correct to the best of my knowledge and that I have read the Privacy Notification.

Program Application Process and Review

The following are the steps that staff follow to complete the income verification:

1. **Validation of customer identity:** Confirming the identity of the applicant is an important first step in the criteria process. The applicant must demonstrate they are an RPU customer and have valid documentation demonstrating their identity. They may not always be the primary account holder but must be registered on the account.

Identity is checked via the following valid Government issued Identification (ID):

- Driver's license
- State or Federal ID card
- REAL ID
- Passport
- Military ID

The applicant must also present their valid Social Security card.

2. **Verification of Income:** Once identity has been verified, household income is checked via a set of approved documentation sources. All household income for everyone in the household must be disclosed for review. Original documents are required.

Acceptable income verification documents include:

- Paycheck stubs: copies of all check stubs (last 4 weeks), full consecutive month of pay
- SSI or SSA award letter (covering current year)
- Current bank statement showing direct deposit only for SSI, SSA, TANF or pension
- Unemployment check stubs/ on-line print out showing direct deposit
- Current TANF Notice of Action or Passport to Services printout (including current month)
- Child support receipts/ on-line printout
- Alimony-spousal support
- Disability insurance payments
- Jury duty payment
- Proof of self-employment (current filed 1040 tax form and Schedule C)

Current year award letter(s) from CalFresh/SNAP, CalWorks/TANF, LIHEAP, Medi-Cal/Medicaid, Healthy Families A&B, National School Lunch Program, SSI, WIC, Bureau of Indian Affairs General Assistance are also required to be submitted.

Processing the approved application

Once the identity and income information are established, if the household meets RPU's income criteria, the application is processed, and monthly payments are applied to the account immediately.

The same identity and income review are used to apply the \$250 urgent notice and deposit assistance elements of SHARE. To qualify, the customer must also be unable to meet the deposit requirement to open a new account or have received a 48-hour tag (notice of disconnection). Deposit amounts can vary depending on the customer's circumstances and a higher level (\$250) applies to customers' accounts when a soft enquiry into their consumer report indicates this is required, or if they were a previous customer and their account was closed in arrears.

Deposit Type	Fee
Electric - Residential - Standard	\$200
Electric - Residential - Higher	\$250

If a customer qualifies for deposit assistance, the amount provided will only cover the deposit amount and does not add any additional funds to their account.

The Customer Engagement Supervisor also verifies the applicant's information to ensure that there is no duplication of the benefit on another account prior to approving an application.

As noted above, staff reject between 10-15 SHARE applications per month because of eligibility factors or incomplete documentation.

Re-applying for the program

Customers can only apply for the program every 12 months; the 12-month period starts when the customer applies for and receives assistance. Customers cannot apply again until the current year has expired. Customers could qualify for the emergency assistance mid-year, and this could generate two separate annual cycles for each part of the program. For example, a customer could apply for and receive monthly assistance in March and then receive a green shut-off notice in June. The customer may not reapply for monthly assistance until the following March and would not have emergency assistance available to them until the following June (and only if they received another shut-off notice at that time).

Staff verify that customers do not receive multiple approvals for the program each year, for example, by moving within the same year. The monthly benefit transfers to the new address and they will receive the benefit for the remaining time within their 12-month period. The timeline for emergency assistance also transfers.

Internal checks and balances

If an application is received from City or RPU staff, additional checks are required and either a manager or executive staff member must review and approve the application to ensure that all program guidelines are followed, and the employee/customer qualifies for the program.

ESAP Program Administration

The Energy Savings Assistance Program (ESAP) uses the same 250% federal poverty guidelines qualification criteria and SHARE customers are referred by RPU to the ESAP program, after qualification has been verified and approved by RPU staff. SoCal Gas maintains a secondary customer list (after exhausting RPU SHARE referrals) of their customers that qualify for their rate assistance. SoCal Gas refers these possible additional customers to RPU to undertake an application process if the vendor that provide ESAP services has exhausted the RPU eligible customers.

FISCAL IMPACT:

There is no fiscal impact associated with this report.

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Attachments:

1. SHARE application, English
2. SHARE application, Spanish
3. Presentation