



PUBLIC BENEFITS LOW-INCOME PROGRAM INCOME VERIFICATION

Customer Engagement

Board of Public Utilities
November 17, 2025

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LEGISLATIVE HISTORY

1. State law has required local publicly owned utilities to provide weatherization programs and rate assistance to low-income customers since the 1990s
2. **Assembly Bill (AB) 1890** (Brulte, 1996) required that 2.85% of electric revenue be utilized to fund public benefits programming to be used in any of the following four areas: demand side management (energy efficiency), renewable energy, **low-income assistance**, or research, development, and demonstration
3. **Senate Bill (SB) 1939** (Alarcon, 2000) added requirements for POUs that 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 and to implement these programs
4. **SB X2-2** (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



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BACKGROUND

RPU has been providing low-income assistance programs since the 1980's

1. Sharing Households Assist Riverside's Energy (SHARE) program established in 1989
 - a. Initially only provided emergency assistance
 - b. Currently provides a monthly on-bill credit and deposit and emergency bill assistance
2. Energy Savings Assistance Program (ESAP) established in 2012
 - a. Provides direct installation of energy efficient devices and appliances to increase efficiency and help lower bills



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BACKGROUND

1. SHARE and ESAP apply the same income qualification criteria
2. Customers who qualify for one program will qualify for the other
3. Currently at 250% or below federal poverty guidelines

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



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PROGRAM PARTICIPATION

1. About 35% of Riverside's households qualify as low-income based on the 250% of Federal Poverty Guidelines
2. The current assistance programs see a far lower participation rate than the potential 31,710 households which could potentially qualify for RPU's SHARE program
3. On average, 5,900 customers per month are in receipt of the assistance, or 19% of potentially qualified customers

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



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DISCUSSION

1. Income criteria of 250% of federal poverty guidelines applies to both the SHARE and ESAP programs. If customers are approved for one program they will automatically qualify for the other
2. SHARE program income verification is co-administered with County of Riverside Department of Public Social Services – Department of Community Action Partnership (CAP)
 - a. 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



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SHARE PROGRAM ADMINISTRATION

Step 1: Validation of customer identity

1. May not be primary account holder but must be named on account
2. Customers must provide a valid form of identification and their Social Security card
 - Qualified identification includes a driver's license, state or federal identification card, Real ID, Passport, or Military ID



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SHARE PROGRAM ADMINISTRATION

Step 2: Income Verification

1. All household income, including for all persons in the household, must be provided
 2. Document submitted must be originals
 3. Current year award letters for other assistance programs should also be submitted
- 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)



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SHARE PROGRAM ADMINISTRATION

1. **Deposit assistance** is only for qualified new customers unable to pay required deposit

- The higher assistance provided if consumer report indicates the requirement or if the customer closed a prior account in arrears
- Assistance only covers the required amount, and no additional funds are placed in the customer's account

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

2. **Emergency assistance** requires the customer have received a 48-hour disconnection notice



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SHARE PROGRAM ADMINISTRATION

- 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, this applies to monthly and \$250 assistance
 - The Customer Engagement Supervisor verifies eligibility for all applications
- Applications from City or RPU staff require additional reviews - a manager or executive staff member must co-sign the application
- About 10-15 applications are denied each month though many customers, after reviewing the qualifications or discussing with staff decide not to apply



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ESAP PROGRAM ADMINISTRATION

1. ESAP uses the same 250% federal poverty guidelines qualification criteria
2. SHARE customers are referred by RPU to the ESAP program, after qualification has been verified and approved by RPU staff
3. SoCal Gas maintains a secondary customer list that the vendor may use after exhausting SHARE referrals which applies the same qualification criteria



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RECOMMENDATION

That the Board of Public Utilities receive and file a report outlining the Public Benefits low-income qualification verification criteria.



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