JOINT 03:

2026-2027 JOINT ARREARS MANAGEMENT PLAN

HOW IT WORKS: FINANCIAL HARDSHIP VERIFICATION

June 1, 2026

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II. CT ANNUAL HOUSEHOLD INCOME GUIDELINES

The Companies annually receive state median income ("SMI") guidelines from the Connecticut Department of Social Services ("DSS")[1]. These guidelines provide the household size and income thresholds customers must have to be at or below 60% SMI for financial hardship designation, which is used to identify eligibility for special utility programs, protections and discounted services.

III. PROOF OF FINANCIAL HARDSHIP ELIGIBILITY

To verify financial hardship, either proof[2] of receipt of a qualifying public assistance benefit or household income and size or is required.

A. RECEIPT OF PUBLIC ASSISTANCE BENEFITS

A customer is categorically eligible for Financial Hardship designation based on the proof of receipt of qualifying public assistance benefits, including the following:

- Connecticut Energy Assistance Program (CEAP)
- Connecticut Free or Reduced Lunch Program
- Head Start
- Medicaid or Access Health; HUSKY A, B, C, D
    - Husky A (Pregnant Women/Postpartum, Children under age 19 or Parents and Caretakers)
    - Husky B (B and 1, Prenatal)
    - Husky C (Long Term Services and Supports, or non-LTSS)
    - Husky D
- Medicare Savings Programs (MSP)
    - Additional Low-Income Medicare Beneficiary (ALMB)
    - Special Low-Income Medicare Beneficiary (SLMB)
    - Qualified Medicare Beneficiary Program (QMB)
- Refugee Cash Assistance and Refugee Medical Assistance
- Section 8 Housing/ Rental Assistance Program (RAP)
- Special/Limited Medical Benefit
- State Administered General Assistance (SAGA)
- State Cash Assistance, State Supplement
- Supplemental Nutrition Assistance Program (SNAP)
- Supplemental Security Income (SSI)/Social Security Disability Income (SSDI)
- Temp. Assistance to Needy Families (TANF); Temp. Family Assistance (TFA)
- Women Infants and Children (WIC)

[1] https://portal.ct.gov/heatinghelp/connecticut-energy-assistance-program-ceap.

[2] Documentation provided must have the customer's name and service address.

B. HOUSEHOLD INCOME AND SIZE

Customers in households that are not receiving a public assistance benefit also have the option to provide verification documents for *all* household members, including those reflected below:

Proof of Income for Adults 18 and Over	Documentation
Unemployment	• Unemployment benefit letter or • Most recent bank statement showing direct deposit with receipt of benefits
Employment	• Weekly – Last four consecutive pay stubs or • Bi-Weekly – Last two consecutive pay stubs or • Last monthly pay stub or • For Seasonal or Fixed Term workers – statements of annual income, such as most recent 1040 tax form
Self-Employment	• Most recent 1099 tax form
Social Security, child support, pension, retirement or other	• Benefit letter or • Most recent bank statement showing direct deposit with receipt of benefits or • Documents showing that your sole source of income is from Social Security, such as a Social Security budget sheet

IV. METHODS TO VERIFY

Customers can provide proof of financial hardship through their Community Action Agency ("CAA"), Town or Social Service Group (together "Community Organizations"), Generation Power CT (fka Operation Fuel), social service organization or their utility directly. Methods to have a customer's financial hardship status verified are described below:

A. CT DSS – via DATA-MATCHING UTILITY CUSTOMERS

The Companies established full data-matching with Department of Social Services ("DSS") whereby the Companies send their full lists of residential customers to DSS for DSS to identify if the customer receives a public assistance benefit. DSS will match information provided and identify financial hardship and LIDR eligibility insight[3] for customers who receive DSS benefits. This DSS data matching process lifts the burden experienced by customers of having to provide the utility with proof of financial hardship in cases where the customer's household has already been verified by DSS.

[3] PURA Ruling on Motion. 85 in Docket. 17-12-03RE11 supported full DSS data match, with additional guidance.

B. CT CAAs – via CEAP File Sharing with Utilities

Customers that are verified by a CAA as financial hardship and who have applied for and have been awarded energy assistance, regardless of the primary heating source (i.e. electric, gas, delivered fuels) are shared with Eversource and Avangrid (UI, SCG and CNG) through a secure file sent by the CAAs[4]. Upon receipt of the file, the Companies code the customer with a financial hardship and for Avangrid, will enroll eligible customers on MPP.

C. CT CAAs – via UTILITY SOCIAL AGENCY PORTALS

Customers experiencing a financial hardship can visit with their local social service department, non-profit, Generation Power CT or CAA for financial hardship verification. These agencies then can access a secure online web portal to directly, and in real-time, code a customer as financial hardship with the utility. Additionally, the portal allows for enrollment into LIDR and/or MPP[5].

D. Utilities – Direct

Customers can continue to submit proof of financial hardship directly to the Companies by fax, U.S.P.S. mail, and at in-person events. Additionally, Avangrid customers can submit proof of financial hardship by email while Eversource customers can submit their documentation via a secure document upload available on their website.

In certain scenarios, the utility *may*[6] direct a customer to their local CAA for verification of household size and composition of household members. Specifically, and for example, after a customer's financial documentation *deems them 'over income'* and then the customer restarts the process and providing conflicting information about the number of people (children or adults) in the household that *may* make them eligible for financial hardship. Unlike the CAAs or DSS, the Company does not have a means to verify the number of children or adults in the household. Yet household size and composition between children and adults are criteria intended for use in financial hardship qualification. Directing customers to their local CAA in certain scenarios will support timeliest, accurate, household size and income verification and at the same time, in good faith, this process protects against fraudulent activity and access to programs and protections defined by statute for financial hardship customers.

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[4] Section 8 of the Eversource MOUs with the CAAs states […shall provide Eversource with dedicated and separate biweekly text (.txt) files as described below using an agreed upon, secure data sharing tool[4] for customers who are financial hardship and have been awarded CEAP benefits for primary heating with *any* utility or provider. This includes customers who are financial hardship and have been awarded CEAP for the primary heating with a utility or provider other than Eversource…]

[5] Order No. 22 of Docket No. 24-10-04 required UI to submit a proposal to modify its web portal for secure document upload. Avangrid submitted its proposal for all three Connecticut Companies, UI, SCG, and CNG in Attachment AV 03_Secure Upload Proposal, of this plan.

[6] The October 22, 2025 Decision at p. 19 states [emphasis added], "*…the Companies shall continue to accept and verify household income for customers,* ***except for customers who the Companies deemed ineligible within a 12-month period, whom the Companies may refer to the CAAs****."*

V. TIMING TO VERIFY

A. ROLLING ANNUAL VERIFICATION

A customer whose financial hardship status is verified, will receive a full 12 months of financial hardship certification. This is also referred to as 'rolling annual' financial hardship verification.

B. WINTER MORATORIUM GRACE PERIOD TO VERIFY

A customer can claim financial hardship and receive temporary service protection *one time during the winter moratorium* – to allow them time to submit their proof via the methods identified above. The Companies will provide *up to* 60[7] days of temporary service protection *within the winter moratorium*[8].

[7] See PURA's directive in Order No. 27 of the April 20, 2022 Decision in Docket No. 21-07-01.
[8] Meaning, temporary service protection will *not* extend past the end of the winter moratorium, or May 1. For example, a customer who claims financial hardship on April 1 may have service protected up to May 1.