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October 7, 2005

Docket Control
Arizona Corporation Commission
1200 West Washington
Phoenix AZ 85007

Re: Docket No. E-01345A-03-0437
Native American Tribes Low Income Assistance Outreach Plan

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AZ CORP COMMISSION
DOCUMENT CONTROL

Dear Sir/Madame:

Pursuant to Decision No. 67744, Section m, page 28, Arizona Public Service Company (APS) hereby files its outreach plan to inform the State's Tribes about low income assistance programs. This plan is being made available to the appropriate tribal authorities within APS' service territory.

If you or your have any questions, please feel free to call me.

Sincerely,

Justin Thompson
Manager
Regulation, Policy and Analysis

JHT/jav

CC: Docket Control
Brian Bozzo, Compliance and Enforcement

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APS NATIVE AMERICAN TRIBES OUTREACH PLAN

**Arizona Public Service Company
APS Native American Tribes
Low Income Assistance
Outreach Plan**

October 7, 2005

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INTRODUCTION

In Decision No. 67744, the Arizona Corporation Commission (“Commission”) noted “that APS should make its low-income assistance programs widely available, including to Native Americans living inside the Company’s service territory.”

The Commission ordered APS to develop an outreach plan “that will enable it to better inform the state’s Tribes about the Company’s low-income assistance programs.”

Currently, Arizona Public Service (“APS”) serves 5,644 residential Native American customers on 11 reservations (Appendix A). The APS service territory where the majority of these Native American customers are located is identified in Appendix B. Two thousand seven hundred and thirty-nine Navajo and two thousand and fifty-three Hopi customers reside in this area. The 2000 United States Census indicates that approximately 43% of the households on the Navajo and Hopi lands are below the Federal poverty level. Because eligibility for low income assistance is based on 150% of the Federal poverty level, a large portion of the population is likely to be eligible for participation in these programs.

APS communicates information about Low Income Weatherization, Energy Support Program E-3, and the Medical Care Equipment Program E-4, annually to all of its customers via bill inserts, bill messages, newsletters, and our new customer Welcome Kit. Additionally, APS also works with the Department of Economic Security to promote E-3/E-4 and the Arizona Community Action Association to promote low income weatherization.

Approximately, 2.8% of our residential customer base is on the E-3/E-4 rate. In comparison, 3.7% of the Native American residential customers living on reservation lands served by APS are enrolled in E-3/E-4. Relying heavily on input from the Native American community, the intent of this plan is to enhance existing communications to Native American customers to increase participation in APS’ low income assistance programs.

TARGET AUDIENCES

A review of tax exemption codes and meter routes on tribal lands indicates that there are a total of 5,644 Native American residential customers on tribal lands. Eligibility for APS' low income assistance programs are based on 150%* of the Federal Poverty guidelines. Using the 2000 Federal Census figures, the potential number of Native Americans at the 100% and 150% level is shown below.

* We will use 150% once the new Low Income Weatherization Program (LIWP) proposal is approved. Currently, LIWP uses 125% with 150% applied for elderly and disabled.

Reservations	# of Residential Customers	% of Households at the Federal Poverty Level	Estimated # of Qualified Customers at 100% of Federal Poverty Level	Estimated # of Qualified Customers at 150% of Federal Poverty Level
Hopi Reservation, Navajo and Coconino County	2,053	41.6%	854	Number is summarized below
Navajo Reservation, Cameron & Tuba City, Coconino County	2,739	41.9%	1147	
San Carlos Apache Reservation, Globe, Gila County	72	50.8%	36	
Tonto Apache Reservation, Payson, Gila County	33	9.8%	3	
San Lucy Reservation, Gila Bend, Maricopa County (Tohono O'odham)	79	46%	36	
Yavapai-Apache, Camp Verde, Yavapai County	165	33.4%	55	
Camp Verde Reservation, Clarkdale, Yavapai County	64	33.4%	21	
Yavapai – Prescott Reservation, Yavapai County	67	6.6%	4	
Cocopah Reservation, Yuma, Yuma County	162	31.4%	50	
Gila River, Pinal County	8	52.1%	4	
Colorado River Reservation, Parker, La Paz County	202	22.2%	42	
Total	5,644	33.5% (AVG)	2,252	

** This conservative estimate is based on the following assumptions. Federal Census 2000 data shows that 13.9% of Arizona's total population is below 100% of the Federal poverty level and 43% of tribal households are below 100% of the Federal poverty level. Therefore, tribal poverty is 3 times the state average. The qualifying income for the low income program is 150% of the Federal poverty level. However, the 2000 Census does not track 150% poverty. Assuming that there are few households with high incomes to bring the average household income up on tribal lands, we are conservatively estimating that the number of homes below 150% is at least 4 times the state average, therefore,

$$4 \times (\text{Arizona State Average of the Federal Poverty Level of } 13.9\%) = 55.6\%.$$

Outreach activities related to communicating APS' low income assistance programs to all customers currently include an annual bill insert, bill messages, newsletter articles, information in our new customer Welcome Kit, and brochures in business offices and Department of Economic Security (DES) offices. The distribution of the bill insert and message is timed to coincide with the annual June release of the new Federal Poverty Guidelines. At that time existing participants are invited to re-enroll and new applicants are solicited. The current schedule of low income program related communications is provided here:

<u>Month</u>	<u>Communication Tool</u>	<u>Topic</u>
April 2005	Newsletter article	Low income bill assistance
June 2005	Bill message	E-3 low income discount
September 2005	Bill insert with E-3 Application	E-3 Sign-up
October 2005	Newsletter article	E-3 low income discount
November 2005	Newsletter	Low income weatherization

Additionally, APS has met with representatives from the following tribes, provided information about our low income assistance programs, discussed Low Income Weatherization Program (LIWP) planning and participated in the following events:

<u>Tribe</u>	<u>Date</u>	<u>Activity</u>
Hopi	5/19/2005	Community Service Administrators meeting
	6/15/2005	Job Fair
	8/8/2005	Meeting with the Office of Elderly Services
	8/17/2005	Meeting with Tribal Chairman Taylor
	9/27 & 28/ 2005	Hopi Housing Summit
Cocopah	6/8/2005	Meeting with Tribal Director
San Lucy	6/20/2005	Meeting with District Chairman and Vice Chairman
Navajo	7/14/2005	Meeting with Division of Community Development to discuss Low Income Weatherization Program
	7/29/2005	Cameron Annual Field Day
	8/23/2005	Meeting with Division of Community Development to continue LIWP planning
	8/28/2005	Cameron Chapter Meeting
	9/12/2005	Cameron Chapter Representative Meeting
San Carlos Apache	9/6/2005	Council Meeting

Yavapai-Apache	9/13/2005	Meeting with tribal social services coordinators
Yavapai-Prescott	9/16/2005	Meeting with President
Colorado River	2005	Telephone contact with representatives
Tonto Apache	9/26/2005	Meeting with Director of Social Services
ITCA	4/8/2005	Meeting with Weatherization Director to discuss LIWP
	6/23/2005	Meeting with Weatherization Director to continue LWIP planning

Based on input from Tribal representatives, we believe that the following additional strategies and associated tactics will enhance the communications with APS' Native American customers.

Strategy	Tactics
Partner with Tribal leadership when communicating directly with membership.	<ul style="list-style-type: none"> ▪ Invite Tribal representatives to co-author or send on our behalf any direct mailings to Tribal members.
Leverage Native American Community gatherings as communication channels.	<ul style="list-style-type: none"> ▪ Provide posters and brochures to Community Centers for display. Provide information and materials for community events.
Leverage the relationships with existing E-3 and E-4 participants to recruit additional enrollments.	<ul style="list-style-type: none"> ▪ Send a direct mail to existing E-3/E-4 customers and invite them to tell their family and acquaintances about the program and encourage them to "tell a friend." Include a copy of the brochure.
Partner with and utilize existing social service network to distribute information.	<ul style="list-style-type: none"> ▪ Work directly with Tribal Social Service agencies and have them include our program as part of the services they offer. <ul style="list-style-type: none"> ▪ Speak at regular monthly meeting with Hopi Office of Elderly Services clients. ▪ Navajo Nation WIC Program P.O. Drawer 1390 Window Rock, AZ 86515 Toll Free No.: (800) 307-4231 Phone: (928) 871-6698 ▪ Hopi Health Care Center

Complement the impact of the E-3/E-4 discount by encouraging application for the APS Sales Tax Exemption Certificate for Native Americans living on reservation lands.

Reach rural remote areas via local media outlets.

PHS Indian Health Services
P.O. Box 4000
Polacca, Arizona 86042
Phone: (928) 737-6000

- Navajo Area Indian Health Service (NAIHS)
P.O. Box 9020
Window Rock, AZ 86515
- Contact DES for correlation with Food Stamps and other services.

- Use E-3 related outreach opportunities targeted towards Native American residential customers to encourage qualified Native American residential customers to apply for APS Sales Tax Exemption Certificate by providing the tax exemption form along with the E-3/E-4 application.

- Since radio is a major communication channel on the more remote reservations, work with the stations to create native language radio ads, Public Service Announcements (PSAs), interviews, news stories, press releases, to inform listeners about APS' low income assistance programs.

Hopi Radio Station. KUYI 88.1 FM
Loris Ann Vicente-Taylor, KUYI GM
The radio station connects the twelve Hopi villages including some of their Navajo neighbors. The programming includes, but is not limited to, Hopi language, internships for Hopi high school students, national and local news, and traditional and contemporary Native American music.

Navajo Radio Station. KTNN 660 AM
KTNN operates and is managed as a commercial AM radio broadcast station operating continuously over a clear-channel radio signal at 50,000 watts on 660 MHz. Daytime broadcast covers much of the Four Corners area including the entire Navajo Nation, which compares in size to the state of West Virginia.

Partner with the Inter Tribal Council of Arizona (ITCA) and the Navajo Division of Community Development to deliver low income weatherization services.

Continue to use local APS business office as a point of contact to share program information.

Ads in local newspapers.

- Utilize ITCA's existing weatherization network and program to provide weatherization services to their member tribes (all Arizona tribes except Navajo).
- Utilize the Navajo Weatherization Assistance Program to deliver weatherization services to their members.
- ITCA and the Navajo Division of Community Development will solicit program participants.

- Post information and forms at the local APS business office. Also promote an APS Low Income Program Assistance month. During this month, APS Customer Care associates will inform all customers visiting the local business offices about APS' low income assistance programs.

- Develop and publish ads in local newspapers.

Hopi newspaper: Hopi Tutuveni
P.O. Box 123, Kykotsmovi, AZ 86039

Navajo Hopi Observer
417 W. Santa Fe Ave, Flagstaff AZ 86001
Phone: (928) 226-9696

Navajo: Farmington Daily Times
P.O. Box 450, Farmington, NM 87499
Phone: (505) 325-4545 / Fax: (505) 564-4630

Yavapai-Apache Nation: Gah'nahvah / Ya Ti'
Newspaper of the Yavapai-Apache Nation
Office of Public Relations / Newspaper
2400 W. Datsi St.
Camp Verde, AZ 86322

TIMELINE INCLUDES

2005

- November Co-author direct mailing letter in partnership with Tribal leadership.
“Tell a Friend” mailing to existing E-3 and E-4 customers.
- December Distribute E-3 posters to community centers and business offices.
Present E-3 Program and information about State Tax Exempt status during monthly community center meetings.

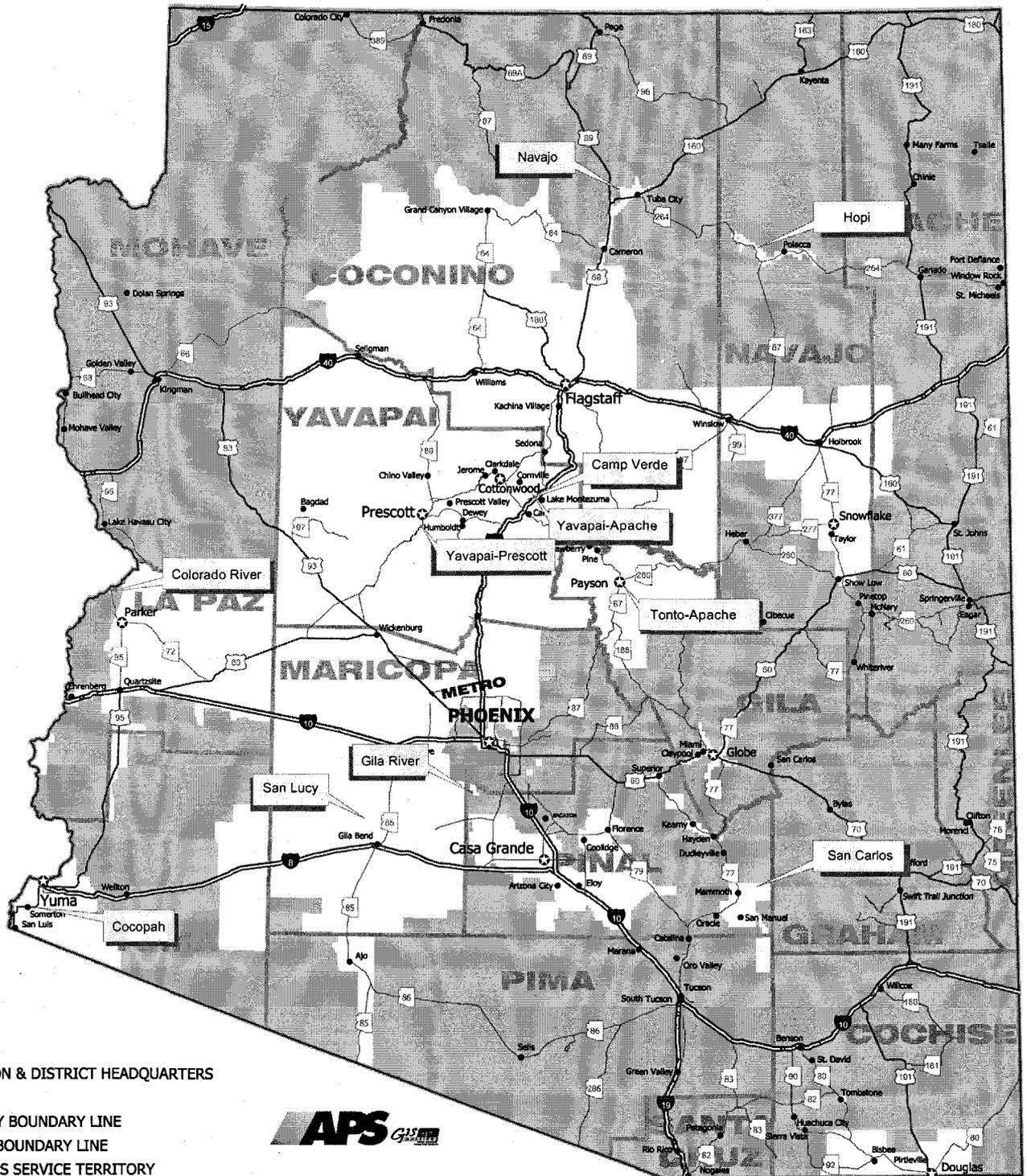
2006

- January Meetings with Tribal social services organizations to distribute program information.
- February Radio Ads and PSAs.
- April Newsletter article about low income bill assistance.
- June Annual E-3 bill message; newspaper ads for E-3/E-4.
- September Bill Insert with E-3/E-4 application.
- October Newsletter article E-3 low income discount.
- November Newsletter article about low income weatherization.

Note: Roll out of Low Income Weatherization services will occur upon ACC approval of the Low Income Weatherization Program.

APPENDIX A

Native American Reservations with Residential Customers Served by APS



APPENDIX B

APS SERVICE TERRITORY WITHIN THE NAVAJO AND HOPI RESERVATIONS

