



NW Energy Coalition
for a clean and affordable energy future

February 12, 2021

Mark Johnson
Executive Director and Secretary
Washington Utilities and Transportation Commission
6221 Woodland Square Loop SE
Lacey, WA 98503

Re: U-200281, Recessed Open Meeting

The NW Energy Coalition appreciates the opportunity to provide written comment in advance of the recessed open meeting on February 17, 2021 on Docket U-200281, related to the impacts of the COVID-19 pandemic on customers. Though the NW Energy Coalition is providing individual comments for this meeting, we continue to converse and coordinate with the other Advocates in the U-200281 Workgroup on the best possible approaches to help customers respond to the challenges of the COVID-19 pandemic. We have also had conversations with the utilities in recent weeks through the low-income advisory groups on program roll outs, as well as individually to understand data on customer arrearages.

The open meeting notice asked commenters to discuss [numbers added for clarity]: “[1] the specific metrics proposed by stakeholders, [2] how to mitigate the length of time a moratorium may be needed, and [3] the appropriate indicators that might support either: (1) maintaining the April 30, 2021, resumption date but with more narrowed disconnection restrictions or (2) keeping the moratoria in place without modification.”

1. Metrics Proposed by Stakeholders

In December 2020, stakeholders submitted information on metrics that the UTC should use in reassessing the COVID-19 pandemic conditions at this upcoming recessed open meeting.

- Advocates submitted a variety of suggested metrics, in four categories: (1) public health considerations, (2) economic considerations, (3) utility customer indicators, and (4) actions of other government agencies.
- Utilities suggested that the UTC should only consider a utility’s readiness to “support customers in need,” but if further metrics are warranted, to consider whether “counties in the utility’s service area has reached Phase 4 in accordance with the State’s Safe Start Guidelines by that time.”

We will not discuss all the metrics proposed in turn, but note that, much as the government must weigh multiple factors and considerations in determining whether to relax pandemic restrictions, the UTC will likely need to consider multiple factors in assessing an extension of the moratorium on disconnections, including: (1) a utility’s

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readiness to support customers, (2) whether the economic situation has improved such that there are jobs available, and (3) whether the public health situation warrants allowing for utility disconnections. A customer being disconnected during the coronavirus pandemic not only causes the typical physical and mental discomfort to the customer and their household, but also exposes the customer to added risk of contracting COVID-19 (due to not having hot water for washing hands, the likelihood of a household moving in with other relations for hot water or heat, etc.). In this time of virtual schooling and work, losing electricity can also have real impacts on household income and education.

2. Mitigating the Length of Time of the Moratorium

We understand that utilities would like certainty in knowing when service disconnections will be allowed to resume and are concerned about rising arrearages in the 90+ and 120+ day category. We also know that, at this point, fewer customers are engaging utility call centers, entering payment plans, and taking advantage of available assistance. One argument for allowing service disconnections is that doing so and starting collections will compel customers to engage with the utility to find assistance. While we understand that argument—and agree there is some validity to the claim that customers may be more likely to seek assistance when faced with such an option—we find it hard to support this path if other public health and economic metrics do not support the step.

During the U-200281 workgroup discussions in 2020, we and others raised the idea of tying utility cost recovery for bill assistance funding to performance metrics (e.g., percentage of customers in arrears enrolled in payment plans or bill assistance, declining total arrearages), but that idea did not advance at that time. We raise this concept again as an idea - if the UTC wants to mitigate the length of time of the moratorium and connect it to metrics more in the direct control of the UTC and its regulated utilities, the UTC could consider tying resumption of normal utility disconnection practices to meeting some utility customer metric, such as was discussed in the Joint Advocates comments from December (e.g., percent of customers in arrears accessing bill assistance).

3. Indicators Related to Maintaining April 30 Resumption Date

We do not think that the current status of the metrics submitted by advocates or utilities warrant maintaining the April 30 resumption date. At the very least, it will take time for utilities to get additional COVID assistance dollars to customers; in most cases, this is funding available to customers beginning April 1. It will take customers time to understand the assistance available and how to access it. Resuming collections processes and disconnections before doing important outreach and education would be detrimental to customers, and undermine confidence in nascent assistance programs. In order for these programs to be successful, a more concerted effort to connect customers to assistance before disconnection policies resume is necessary.

A Note on Data

We appreciate the Commission requesting data that the five investor-owned utilities have submitted and will do on an ongoing basis until six months after the resumption of service disconnections. Having this information is helpful, as it provides a better snapshot of customer needs. When we were discussing these same issues in the spring and summer of 2020, it was difficult to make recommendations, as the customer information was all with

the utilities. We recommend that the Commission continue gathering this kind of information on arrearages and related participation in customer support programs on an ongoing basis, including beyond six months past the resumption of disconnections as currently required. Having this information publicly available can help stakeholders and the UTC understand any systemic issues to assisting customers, and could assist with the further evolution of customer programs.

I plan to be in attendance at the February 17 Recessed Open Meeting.

Thank you for considering our comments,

Amy Wheelless
Senior Policy Associate