



ATTORNEY GENERAL OF WASHINGTON

Public Counsel

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March 19, 2021

SENT VIA WUTC WEB PORTAL

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

Re: Avista Proposed Tariff WN U-28, Schedule 73, Residential Debt Relief Program.
Docket UE-210114

Dear Mr. Johnson:

The Public Counsel Unit of the Washington State Attorney General's Office ("Public Counsel") respectfully submits these comments in advance of the March 25, 2021, Open Meeting. These comments are in response to Avista's filing of Tariff WN U-28, Schedule 73, and Residential Debt Relief Program. This program was developed in compliance with Order 01 in Docket U-200281.¹ Avista discussed the implementation of this program with the Low Income Advisory Group. Public Counsel appreciates the in-depth discussion of the program and Avista's efforts to elicit feedback from multiple stakeholders.

Avista has proposed to utilize the Debt Relief Program funds for the following two program components: (1) An automatic, one time COVID-19 Arrearage Forgiveness Grant, not to exceed \$2,500 for residential customers with a proven history of low-income program eligibility; and (2) an arrearage forgiveness grant, not to exceed \$2,500 for residential customers at or below 200 percent FPL who have not received energy assistance within the past 24 months and have COVID-19 related arrears. Avista's Debt Relief Program is set to become operational beginning April 1, 2021.

Public Counsel's Recommendation

Public Counsel recommends the Commission approve the revisions to Tariff WN U-28, Schedule 73, Residential Debt Relief Program.

¹ *In the Matter of Response to the COVID-19 Pandemic*, Docket U-200281, Order 01: Extending Suspension of Disconnection of Energy Services for Nonpayment and Adopting Related Requirements (Oct. 20, 2020).

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A. Automatic Grant

The automatic Grant is a one-time COVID-19 Arrearage Forgiveness Grant, not to exceed \$2,500 for residential customers with a proven history of low-income program eligibility. The program is intended as immediate bill assistance to those that have received energy assistance in the past two years and have an arrearage balance that exceeds \$50. To do this, Avista will review all residential accounts on April 1st, and administer an automatic grant of the full past due balance. The total amount currently estimated to be distributed is \$2,744,050. The average past due balance for customers eligible for the automatic grant is \$498, and it would assist approximately 5,506 customers.

B. Arrearage Forgiveness Grant

The proposed Arrearage Forgiveness Grant is not to exceed \$2,500 for residential customers at or below 200 percent FPL that have not received energy assistance within the past 24 months and have COVID-19 related arrears. The grant is to be distributed on a first-come, first-served basis and it will be administered until funds are exhausted, September 30, 2022, or the Commission otherwise modifies the program, whichever is earlier. The grant will cover the full past-due balance, and should not result in a credit. However, at agency discretion, a \$100 credit may be added to the account to stabilize the household while they seek additional assistance.

C. Program Administration

The Automatic Grant will be administered by Avista. The Forgiveness Grant will be available to qualifying customers through strategies intended to improve the ease with which customers can obtain the debt relief benefit including: (1) traditional avenues serviced by the established Agencies that already deliver Avista's LIRAP and other energy assistance services to customers; and (2) a new Community Partner Network (CPN). The CPN will include representation from organizations that serve marginalized communities such as rural, immigrant, tribal, and people of color. Public Counsel is especially supportive of the new CPN as we believe it will increase the potential for customer engagement in hard-to-reach and underserved areas by utilizing established representatives within the community they serve.

D. Debt Relief Program and Energy Assistance Interaction

Public Counsel believes these programs have been designed in such a way that will be complimentary to existing and future energy assistance programs available to customers. Public Counsel believes the proposed Debt Relief Program is synchronized well with the proposed revisions Avista submitted in regards to their LIRAP program, which would add an Arrearage

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Management Plan, Percentage of Income Payment Plan, and Past Due Payoff. Public Counsel submitted comments in support of these programs as well in Docket UE-210077.

E. Outreach and Reporting

Public Counsel commends the Company for its efforts to raise awareness about the availability of bill assistance throughout 2020. The efforts included making updates to their website, emailing customers, printed advertisements in local publications, and bill inserts. While the Company is still developing its communication plans in consultation with its Advisory Group, Avista has proposed anticipated strategies for outreach that Public Counsel generally supports.

In addition to the reporting requirements in Order 01 in Docket U-200281, Avista will provide reporting on the amount of assistance that has been provided throughout the implementation of the Debt Relief Program. Public Counsel encourages Avista to provide this and other data required under Order 01 in Docket U-200281 in advance of the May Open Meeting at which the Commission will evaluate the disconnection moratorium. Providing the data ahead of the May Open Meeting will allow the Commission and stakeholders to review and analyze the data to understand how debt assistance programs have benefited customers.

Public Counsel appreciates the opportunity to submit these comments. If you have any questions about this filing, please contact Sarah Laycock at (206) 496-9989 or via e-mail at Sarah.Laycock@ATG.WA.GOV.

Sincerely,

Lisa W. Gafken

/s/

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