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State Of WASH.
UTIL. AND TRANSP.
COMMISSION

Mark L. Johnson, Executive Director Secretary
Washington Utilities & Transportation Commission
621 Woodland Square Loop S.E.
Lacey, WA 98503

RE: Puget Sound Energy Dockets UE-200331 and UG-200332, CACAP Proposal
April 10th Open Meeting Items A4 and A5

Dear Mr. Johnson:

The NW Energy Coalition (NVEC) appreciates this opportunity to comment on Puget Sound Energy's (PSE's) assistance program proposal and to offer some conditions for your consideration.

First, we want acknowledge PSE's efforts to respond to a rapidly evolving situation. The number of people predicted to economically suffer due to the COVID-19 crisis is daunting. In times of emergency, there is always a tension between moving quickly and consultation/collaboration. In this situation, consultation with the Advisory Committee came later than ideal – the Advisory Committee was not given opportunity for input prior to filing of the proposal. We are glad that consultation is now occurring and offer some recommendations to incorporate Advisory Committee suggestions in the filing and associated direction from the Commission on this issue.

1. Ensure that those PSE customers requesting assistance via CACAP, who might also be eligible for HELP or LIHEAP assistance, are directed to HELP for additional resources and assistance. PSE assured stakeholders during a call that this determination and redirection of customers is possible, so this should be made clear. PSE should continue to work with members of the Advisory Committee to accomplish this.
2. Direct PSE to work with the CAAs to streamline HELP applications and delivery by modification of contracts and tariffs (if necessary) and report back to the Commission in two weeks to ensure CACAP/HELP outreach is clear and equitable. The proposed CACAP application process is more direct and simpler to accomplish than the application process currently required of HELP applicants, which seems odd and a bit inequitable.
3. Allow applicants to apply via the portal, phone or mail from the start, and not require customers to first try the portal, then only when unable to use the portal, to call or write. While applying online can spare applicants the need to set up an appointment, some may not be able to access the portal or have the equipment to do so. Offering the applicants choice on how to apply would be more efficient.
4. Require timely reporting every 30 days for the first three months or until the program is sunset, rather than wait until May 2021, to monitor program impact and determine if adjustments need to be implemented. While PSE has represented to stakeholders the program will sunset in six months, that is not specified in the filing. It should be.

5. There are some issues regarding funding that need clarification. First, in the event there is a massive increase in HELP applications, the funds allocated to the CACAP program should remain available to the HELP program, to serve the very lowest income customers first. This is particularly true for electric roll over funds, since electric heat is the primary heat source for the lowest income households. Second, since PSE assured the stakeholders via phone call that existing internal staff will be redirected to the new work under CACAP (avoiding lay-offs), and that AVERTRA would not be charging for this program, PSE should be directed not to expend rate payer funds on outside consultants or contractors.
6. Customer/applicant data and personal information must be protected and not shared with third party contractors.
7. During this crisis, the Advisory Committee should meet monthly or more frequently if needed (via the internet) and review both HELP and CACAP programs.

Cordially,

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