# BEFORE THE WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION

In the Matter of the Regulate	ed Utility
Response to the COVID-19	Pandemic

DOCKET U-200281

## **ATTACHMENT A**

TO

SUPPLEMENTAL COMMENTS OF THE ENERGY PROJECT MAY 7, 2021

# Highlights: Top Zip Code Analysis Puget Sound Energy (PSE) Residential Arrearages & Public and Environmental Health Disparities

as of March 2021

77/232

zip codes had arrearages that grew > **50%** from Mar. 2020 to Mar. 2021

One third of PSE's 232 zip codes have experienced **substantial growth in residential arrearages** since prior to the pandemic in March 2020, however...

21%

of **all** residential arrearages are from the **Top 10** zip codes 26%

of **known low-income** residential arrearages are from the **Top 10** zip codes

A significant portion of residential and known low-income arrearages are **concentrated in a few zip codes**.

- PSE's top 5 zip codes have the highest correlation with *people of color* and *social vulnerability to COVID-19* of any of the IOUs.
- All five zip codes have areas designated as Highly Impacted Communities (HIC).

#### **Summary of Tables**

Of PSE's 232 zip codes, the top five zip codes with the highest total residential arrearages and highest known low-income (KLI) residential arrearages account for 12% and 15%, respectively, of the entire total for March 2021. The corresponding 90+ day arrearages for these zip codes also account for 12% and 13%, respectively, of the entire total for March 2021. All five zip codes include areas classified as "Highly Impacted Communities" by the Washington State Department of Health (DOH).

Table 1. Top 5 Zip Codes with Highest Arrearages (of 232 Zip Codes)<sup>1</sup> as of March 2021

Puget Sound Energy	ZC 1 98003	ZC 2 98002		ZC3 98023	ZC 4 98092	ZC 5 98032	Sum & % of March 2021
Communities Served	Federal Way	Auburn	F	ederal Way	NE Auburn	Kent	Residential (or KLI) Total
Total Residential Arrearages	\$ 2,086,138	\$ 1,881,726	\$	1,863,560	\$ 1,810,603	\$ 1,550,979	\$9.19M (12%)
Per Capita Arrearages	\$ 530	\$ 653	\$	611	\$ 519	\$ 467	N/A
90+ Day Arrearages	\$ 899,613	\$ 649,338	\$	820,981	\$ 665,472	\$ 677,211	\$3.7M (12%)
KLI Arrearages	\$ 516,664	\$ 399,873	\$	372,218	\$ 442,240	\$ 322,331*	\$2.05M (15%)
90+ Day Arrearages		\$ 140,179	\$	155,545	\$ 199,396	\$ 142,889*	\$0.86M (13%)

Sources: U-200281, PSE Arrearage Data through March 2021, (April 30, 2021), Sheet 8; UTC Staff Residential Arrearage Map Tool (per capita data).

Table 2. Highly Impacted Communities & DOH Social and Health Vulnerability Measure
Rankings in Top 5 Zip Codes

Top 5 Zip		Number of		Range of	DOH Dispariti	es Ranks	
Codes with Highest Arrears	Communities Served	Census Tracts per Zip Code	People of Color	Unemployed	Social Vulnerability to COVID-19	Pop. In Poverty ≤ 185% FPL	Highly Impacted Community
98003	Federal Way	15	8-10	3-9	6-10	4-9	Yes
98002	Auburn	8	7-9	2-9	8-10	6-10	Yes
98023	Federal Way	10	7-10	2-10	6-9	4-7	Yes
98092	NE Auburn	15	2-10	1-10	1-9	1-8	Yes
98032	Kent	13	8-10	4-10	7-10	5-10	Yes

Sources: WA Dept. of Health (DOH) Environmental Health Disparities (EHD) Mapping tool. <sup>2</sup> <<https://fortress.wa.gov/doh/wtn/WTNIBL>>; Washington Tracking Network Mapping tool <sup>3</sup>; Geography Division, U.S. Census Bureau, Geocorr 2018 (census tracts within zip codes). -Highlighted cells indicate zip codes with a census tract that ranked 9 or 10 by DOH, on a scale of 1-10, or have been designated as HIC.

<sup>\*</sup>Zip code 98032 did not rank in the top 5 for KLI Arrearages, however it ranks in the top 10. 1 additional zip code ranked within the top 5 for KLI Arrearages, 98226 (NE Bellingham, \$404,926).

<sup>-</sup>Darker shading within a row indicates a higher value.

<sup>-</sup>Highly Impacted Communities (HIC) meet one of two criteria: 1) a census tract is at least partially covered by Tribal Lands, or 2) a census tract ranks 9 or 10 on the DOH Environmental Health Disparities Map.

<sup>&</sup>lt;sup>1</sup> The 30/60/90 residential vintage data totals \$49.66M, which is the total past due amount shown in Table 1. The residential 'total arrearages' reported by PSE are \$75.73M, but PSE has stated that total includes balances owed for less than 30 days. E-mail from Andrew Sellards of UTC Staff, April 2, 2021. The percent growth data shown on page 1 excludes arrearages from 1-30 days that PSE initially reported.

<sup>&</sup>lt;sup>2</sup> DOH Environmental Disparities Mapping Tool. POC (OFM Data, sum of all ethnicities categories except White/Non-Hispanic), Unemployed (ACS Data, population age 16+ registered as unemployed), Pop. In Poverty (ACS Data, population living at or below 185% FPL).

<sup>&</sup>lt;sup>3</sup> DOH Washington Tracking Network Mapping Tool. Social Vulnerability to COVID-19 (DOH summary of household composition & disability, housing type & transportation, race/ethnicity & language, and socioeconomic determinants).

# Highlights: Top Zip Code Analysis Avista Residential Arrearages & Public and Environmental Health Disparities

as of March 2021

82/105

zip codes had arrearages that grew > **50%** from Mar. 2020 to Mar. 2021

The vast majority of Avista's 105 zip codes have experienced **substantial growth in residential arrearages** since prior to the pandemic in March 2020, however...

58%

of **all** residential arrearages are from the **Top 10** zip codes 60%

of **known low-income** residential arrearages are from the **Top 10** zip codes

A significant portion of residential and known low-income arrearages are **concentrated in a few zip codes**.

- The highest DOH Environmental Health Disparities (EHD) map rankings align well
  with the zip codes with highest arrearages. The higher the arrearage, the higher that
  zip code ranks for the selected disparities (e.g. higher percent of population in
  poverty, unemployment, etc.).
- All five zip codes have areas designated as Highly Impacted Communities (HIC).

#### **Summary of Tables**

Of Avista's 105 zip codes, the top five zip codes with the highest total residential arrearages and associated known low-income residential arrearages account for 38% and 37%, respectively, of the entire total for March 2021. The corresponding 90+ day arrearages for these zip codes also account for 39% and 32%, respectively, of the entire total for March 2021. All five zip codes include areas classified as "Highly Impacted Communities" by the Washington State Department of Health (DOH).

Table 1. Top 5 Zip Codes with Highest Arrearages (of 105 Zip Codes) as of March 2021

Avista	<b>ZC 1</b> 99205			<b>ZC 2</b> 99207	<b>ZC 3</b> 99208		<b>ZC 4</b> 99202		<b>ZC 5</b> 99223	Sum & % of March 2021 Residential	
Communities Served	NW Spokane		North-central Spokane		North-central Spokane		East Spokane		SE Spokane		(or KLI) Total
Total Residential Arrearages	\$	1,307,000	\$	1,306,989	\$	1,039,171	\$	710,720	\$	617,919	\$4.98M (38%)
Per Capita Arrearages	\$	513	\$	529	\$	373	\$	554	\$	422	N/A
90+ Day Arrearages	\$	1,023,295	\$	1,062,239	\$	827,454	\$	585,471	\$	471,719	\$3.97M (39%)
KLI Arrearages	\$	594,183	\$	143,364*	\$	444,207	\$	393,132	\$	241,874*	\$1.82M (37%)
90+ Day Arrearages	\$	526,780	\$	55,846*	\$	399,375	\$	348,988	\$	211,370*	\$1.54M (32%)

Sources: U-200281, Avista Arrearage Data through March 2021, (April 30, 2021), Sheet 8; UTC Staff Residential Arrearage Map Tool (per capita data).

Table 2. Highly Impacted Communities & DOH Social and Health Vulnerability Measure
Rankings in Top 5 Zip Codes

Top 5 Zip		Number of		Census Tract Ra	ange of DOH Di	sparities Rank	S
Codes with Highest Arrears	Communities Served	Census Tracts per Zip Code	People of Color	Unemployed	Social Vulnerability to COVID-19	Pop. In Poverty ≤ 185% FPL	Highly Impacted Community
99205	NW Spokane	13	2-5	5-10	2-7	5-10	Yes
99207	North-central Spokane	9	5-6	6-10	6-10	10	Yes
99208	North-central Spokane	16	1-4	4-10	1-9	1-10	Yes
99202	East Spokane	12	1-7	4-10	4-10	6-10	Yes
99223	SE Spokane	12	1-5	1-8	1-7	1-7	Yes

Sources: WA Dept. of Health (DOH) Environmental Health Disparities (EHD) Mapping tool. 1 << https://fortress.wa.gov/doh/wtn/WTNIBL>>; Washington Tracking Network Mapping tool 2; Geography Division, U.S. Census Bureau, Geocorr 2018 (census tracts within zip codes).

<sup>\*</sup>Zip codes 99207 and 99223 did not rank in the top 5 for KLI Arrearages, however 99223 ranks in the top 10. 2 additional zip codes ranked within the top 5 for KLI Arrearages, 99201 (NW Spokane, \$258,351) and 99217 (NE Spokane, \$243,091).
-Darker shading within a row indicates a higher value.

<sup>-</sup>Highlighted cells indicate zip codes with a census tract that ranked 9 or 10 by DOH, on a scale of 1-10, or have been designated as HIC.
-Highly Impacted Communities (HIC) meet one of two criteria: 1) a census tract is at least partially covered by Tribal Lands, or 2) a census tract ranks 9 or 10 on the DOH Environmental Health Disparities Map.

<sup>&</sup>lt;sup>1</sup> DOH Environmental Health Disparities Mapping Tool. POC (OFM Data, sum of all ethnicities categories except White/Non-Hispanic), Unemployed (ACS Data, population age 16+ registered as unemployed), Pop. In Poverty (ACS Data, population living at or below 185% FPL). <sup>2</sup> DOH Washington Tracking Network Mapping Tool. Social Vulnerability to COVID-19 (DOH summary of household composition & disability, housing type & transportation, race/ethnicity & language, and socioeconomic determinants).

# Highlights: Top Zip Code Analysis PacifiCorp Residential Arrearages & Public and Environmental Health Disparities

as of March 2021

31/35

zip codes had arrearages that grew > **50%** from Mar. 2020 to Mar. 2021

The vast majority of PacifiCorp's 35 zip codes have experienced **substantial growth in residential arrearages** since prior to the pandemic in March 2020, however...

80%

of **all** residential arrearages are from the **Top 10** zip codes 84%

of **known low-income** residential arrearages are from the **Top 10** zip codes

A significant portion of residential and known low-income arrearages are **concentrated in a few zip codes**.

- PacifiCorp has the largest percentage of zip codes with high percent growth in arrearages compared to other IOUs.
- 3 of the 5 zip codes have areas designated as **Highly Impacted Communities** (HIC) and all 5 zip codes have areas that rank highest by DOH in each of the social and health measures shown in Table 2: people of color, unemployment, social vulnerability to COVID-19, and percent of population in poverty.

#### **Summary of Tables**

Of PacifiCorp's 35 zip codes, the top five zip codes with the highest total residential arrearages and highest known low-income residential arrearages account for 54% and 45%, respectively, of the entire total for March 2021. The corresponding 90+ day arrearages for these zip codes also account for 27% and 45%, respectively, of the entire total for March 2021. Three of five zip codes include areas classified as "Highly Impacted Communities" by the Washington State Department of Health (DOH).

Table 1. Top 5 Zip Codes with Highest Arrearages (of 35 Zip Codes) as of March 2021

	ZC 1		ZC 2	ZC3		ZC 4		ZC 5	Sum & % of Dec.	
PacifiCorp	98902		98908	98901	98903			99362	2020 Residential	
Communities Served	Yakima		W Yakima	NE Yakima		SW Yakima		Walla Walla	(or KLI) Total	
Total Residential Arrearages	\$ 1,627,790	\$	1,220,453	\$ 1,124,966	\$	796,104	\$	785,223	\$5.55M (54%)	
Per Capita Arrearages	\$ 375	\$	446	\$ 424	\$	474	\$	274	N/A	
90+ Day Arrearages	\$ 855,199	\$	522,831	\$ 607,939	\$	386,204	\$	397,819	\$2.77M (27%)	
KLI Arrearages	\$ 208,913	\$	70,447*	\$ 160,924	\$	75,565*	\$	136,404	\$0.65M (45%)	
90+ Day Arrearages	\$ 129,772	\$	40,888*	\$ 100,863	\$	39,964*	\$	81,492	\$0.39M (45%)	

Sources: U-200281, PacifiCorp Arrearage Data through March 2021, (April 30, 2021), Sheet 8; UTC Staff Residential Arrearage Map Tool (per capita data).

Table 2. Highly Impacted Communities & DOH Social and Health Vulnerability Measure Rankings in Top 5 Zip Codes

Top 5 Zip		Number of		Range of	DOH Dispariti	es Ranks	
Codes with Highest Arrears	Communities Served	Census Tracts per Zip Code	People of Color	Unemployed	Social Vulnerability to COVID-19	Pop. In Poverty ≤ 185% FPL	Highly Impacted Community
Aireais	3ei veu	Zip Code	Coloi	Offerfiployed	to COVID-13	103/0171	Community
98902	Yakima	10	6-10	1-10	5-10	5-10	Yes
98908	W Yakima	14	5-9	1-9	5-9	4-9	No
98901	NE Yakima	10	4-10	3-10	4-10	4-10	Yes
98903	SW Yakima	8	3-10	1-10	5-10	4-10	Yes
99362	Walla Walla	11	3-10	1-10	1-10	1-10	No

Sources: WA Dept. of Health (DOH) Environmental Health Disparities (EHD) Mapping tool. 1 <<ht>1 <<ht

<sup>\*</sup>Zip codes 98908 and 98903 did not rank in the top 5 for KLI Arrearages, however both rank in the top 10. 2 additional zip codes ranked with in the top 5 for KLI Arrearages, 98951 (Wapato, \$242,743) and 98948 (Toppenish, \$134,450).

<sup>-</sup>Darker shading within a row indicates a higher value.

<sup>-</sup>Highlighted cells indicate zip codes with a census tract that ranked 9 or 10 by DOH, on a scale of 1-10, or have been designated as HIC.

<sup>-</sup>Highly Impacted Communities (HIC) meet one of two criteria: 1) a census tract is at least partially covered by Tribal Lands, or 2) a census tract ranks 9 or 10 on the DOH Environmental Health Disparities Map.

<sup>&</sup>lt;sup>1</sup> DOH Environmental Health Disparities Mapping Tool. POC (OFM Data, sum of all ethnicities categories except White/Non-Hispanic), Unemployed (ACS Data, population age 16+ registered as unemployed), Pop. In Poverty (ACS Data, population living at or below 185% FPL). <sup>2</sup> DOH Washington Tracking Network Mapping Tool. Social Vulnerability to COVID-19 (DOH summary of household composition & disability, housing type & transportation, race/ethnicity & language, and socioeconomic determinants).

# Highlights: Top Zip Code Analysis Cascade Natural Gas (CNG) Residential Arrearages & Public and Environmental Health Disparities

as of March 2021

24/76

zip codes had arrearages that grew > **50%** from Mar. 2020 to Mar. 2021

Thirty-two percent of CNG's 76 zip codes have experienced **substantial growth in residential arrearages** since prior to the pandemic in March 2020, however...

42%

of **all** residential arrearages are from the **Top 10** zip codes 49%

of **known low-income** residential arrearages are from the **Top 10** zip codes

A significant portion of residential and known low-income arrearages are **concentrated in a few zip codes.** 

- Compared to the other IOUs, fewer zip codes have a very high percent growth in arrears from 2020 to 2021.
- 4 of the 5 zip codes have areas designated as **Highly Impacted Communities** (HIC).

#### **Summary of Tables**

Of CNG's 76 zip codes, the top five zip codes with the highest total residential arrearages and associated known low-income residential arrearages account for 26% and 30%, respectively, of the entire total for March 2021. The corresponding 90+ day arrearages for these zip codes also account for 28% and 32% of the entire total for March 2021. Four of the five zip codes include areas classified as "Highly Impacted Communities" by the Washington State Department of Health (DOH).

Table 1. Top 5 Zip Codes with Highest Arrearages (of 76 Zip Codes) as of March 2021

	ZC 1		ZC 1 ZC 2 ZC 3 ZC 4		ZC 4	ZC 5		Sum & % of March		
Cascade (CNG)	98902		99301		99362		98225	98312		2021 Residential
Communities Served	SW Yakima		W Pasco		Walla Walla		Bellingham		Bremerton	(or KLI) Total
Total Residential Arrearages	\$ 347,786	\$	270,367	\$	215,498	\$	177,529	\$	166,066	\$1.12M (26%)
Per Capita Arrearages	\$ 384	\$	314	\$	308	\$	341	\$	304	N/A
90+ Day Arrearages	\$ 134,121	\$	75,917	\$	72,435	\$	56,676	\$	62,752	\$0.4M (28%)
KLI Arrearages	\$ 43,658	\$	37,100	\$	16,556*	ç	13,156*	\$	16,928	\$0.13M (30%)
90+ Day Arrearages	\$ 17,190	\$	12,569	\$	5,394*	ç	4,820*	\$	7,231	\$0.05M (32%)

Sources: U-200281, CNG Arrearage Data through March 2021, (April 30, 2021), Sheet 8; UTC Staff Residential Arrearage Map Tool (per capita data).

-Darker shading within a row indicates a higher value.

Table 2. Highly Impacted Communities & DOH Social and Health Vulnerability Measure
Rankings in Top 5 Zip Codes

Top 5 Zip		Number of		Range of	DOH Dispariti	es Ranks	
Codes with Highest Arrears	Communities Served	Census Tracts per Zip Code	People of Color	Unemployed	Social Vulnerability to COVID-19	Pop. In Poverty ≤ 185% FPL	Highly Impacted Community
98902	SW Yakima	10	6-10	6-10	5-10	5-10	Yes
99301	W Pasco	11	6-10	1-9	3-10	2-10	Yes
99362	Walla Walla	11	3-10	2-10	1-10	1-10	No
98225	Bellingham	11	1-7	2-10	2-9	4-10	Yes
98312	Bremerton	13	2-8	2-9	2-8	1-9	Yes

<sup>\*</sup>Zip codes 99362 and 98225 did not rank in the top 5 for KLI Arrearages, however 99362 ranks in the top 10. 2 additional zip codes ranked within the top 5 for KLI Arrearages, 98366 (Port Orchard, \$18,418) and 98284 (Sedro-Woolley, \$16,741).

<sup>-</sup>Highlighted cells indicate zip codes with a census tract that ranked 9 or 10 by DOH, on a scale of 1-10, or have been designated as HIC.
-Highly Impacted Communities (HIC) meet one of two criteria: 1) a census tract is at least partially covered by Tribal Lands, or 2) a census tract ranks 9 or 10 on the DOH Environmental Health Disparities Map.

<sup>&</sup>lt;sup>1</sup> DOH Environmental Disparities Mapping Tool. POC (OFM Data, sum of all ethnicities categories except White/Non-Hispanic), Unemployed (ACS Data, population age 16+ registered as unemployed), Pop. In Poverty (ACS Data, population living at or below 185% FPL).

<sup>2</sup> DOH Washington Tracking Network Mapping Tool. Social Vulnerability to COVID-19 (DOH summary of household composition & disability, housing type & transportation, race/ethnicity & language, and socioeconomic determinants).

# Highlights: Top Zip Code Analysis Northwest Natural Gas (NWNG) Residential Arrearages & Public and Environmental Health Disparities

as of March 2021

21/41

zip codes had arrearages that grew > **50%** from Mar. 2020 to Mar. 2021

A majority of NWNG's 41 zip codes have experienced **substantial growth in residential arrearages** since prior to the pandemic in March 2020, however...

83%

of **all** residential arrearages are from the **Top 10** zip codes 93%

of **known low-income** residential arrearages are from the **Top 10** zip codes

A significant portion of residential and known low-income arrearages are **concentrated in a few zip codes**.

- 4 of the 5 zip codes have areas designated as Highly Impacted Communities (HIC).
- The top 5 zip codes also rank highly in the DOH Environmental Health Disparities (EHD) map, in terms of social and health metrics (e.g. higher percent of population in poverty, unemployment, etc.).

#### **Summary of Tables**

Of Northwest Natural Gas's 41 zip codes, the top five zip codes with the highest total residential arrearages and highest known low-income residential arrearages account for 51% and 55%, respectively, of the entire total for March 2021. The corresponding 90+ day arrearages for these zip codes also account for 47% and 56% of the entire total for March 2021. Four of five zip codes include areas classified as "Highly Impacted Communities" by the Washington State Department of Health (DOH).

Table 1. Top 5 Zip Codes with Highest Arrearages (of 41 Zip Codes) as of March 2021

	ZC 1	ZC 2	ZC3	ZC 4	ZC 5	Sum & % of Dec.
Northwest Natural Gas	98682	98662	98684	98607	98604	2020 Residential
Communities Served	E Five Corners	Five Corners	Evergreen	Camas	Battle Ground	(or KLI) Total
Total Residential Arrearages	\$ 324,207	\$ 154,287	\$ 160,656	\$ 154,580	\$ 148,302	\$942K (51%)
Per Capita Arrearages	\$ 247	\$ 251	\$ 287			N/A
90+ Day Arrerages	\$ 101,262	\$ 55,815	\$ 51,475	\$ 37,504	\$ 46,928	\$293K (47%)
KLI Arrearages	\$ 1,525	\$ 1,973	\$ 1,265	\$ 265*	\$ 853*	\$5.9K (55%)
90+ Day Arrerages	\$ 296	\$ 457	\$ 32	\$ 26*	\$ 273*	\$1.1K (56%)

Sources: U-200281, NWNG Arrearage Data through March 2021, (April 30, 2021), Sheet 8; UTC Staff Residential Arrearage Map Tool (per capita data).

Table 2. Highly Impacted Communities & DOH Social and Health Vulnerability Measure
Rankings in Top 5 Zip Codes

Top 5 Zip		Number of		Range of	DOH Dispariti	es Ranks	
Codes with Highest Arrears	Communities Served	Census Tracts per Zip Code	People of Color	Unemployed	Social Vulnerability to COVID-19	Pop. In Poverty ≤ 185% FPL	Highly Impacted Community
98682	E Five Corners	16	3-7	1-9	3-9	3-10	Yes
98662	Five Corners	11	1-7	1-10	2-9	3-10	Yes
98684	Evergreen	7	5-7	2-8	3-9	3-8	Yes
98607	Camas	13	1-7	3-9	1-5	1-6	Yes
98604	Battle Ground	11	1-3	2-9	1-5	1-7	No

Sources: WA Dept. of Health (DOH) Environmental Health Disparities (EHD) Mapping tool. 1 <<ht>1 <<ht>1 <<ht>1 fortress.wa.gov/doh/wtn/WTNIBL>>;</h>Washington Tracking Network Mapping tool 2; Geography Division, U.S. Census Bureau, Geocorr 2018 (census tracts within zip codes).

<sup>\*</sup>Zip codes 98607 and 98604 did not rank in the top 5 for KLI Arrearages, however 98604 ranks in the top 10. 2 additional zip codes ranked with in the top 5 for KLI Arrearages, 98671 (Washougal, \$1,372) and 98661 (E Vancouver, \$910).

<sup>-</sup>Darker shading within a row indicates a higher value.

<sup>-</sup>Highlighted cells indicate zip codes with a census tract that ranked 9 or 10 by DOH, on a scale of 1-10, or have been designated as HIC.
-Highly Impacted Communities (HIC) meet one of two criteria: 1) a census tract is at least partially covered by Tribal Lands, or 2) a census tract ranks 9 or 10 on the DOH Environmental Health Disparities Map.

<sup>&</sup>lt;sup>1</sup> DOH Environmental Health Disparities Mapping Tool. POC (OFM Data, sum of all ethnicities categories except White/Non-Hispanic), Unemployed (ACS Data, population age 16+ registered as unemployed), Pop. In Poverty (ACS Data, population living at or below 185% FPL).
<sup>2</sup> DOH Washington Tracking Network Mapping Tool. Social Vulnerability to COVID-19 (DOH summary of household composition & disability, housing type & transportation, race/ethnicity & language, and socioeconomic determinants).