



NW Energy Coalition
for a clean and affordable energy future

May 7, 2021

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

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Re: Comments on U-200281, for May 12 Recessed Open Meeting

The NW Energy Coalition (NWECC) appreciates the opportunity to provide written comment in advance of the recessed open meeting on May 12, 2021 on Docket U-200281, related to the impacts of the COVID-19 pandemic on customers. We have reviewed the comments and data submitted on April 30, 2021 by the energy utilities, by the Public Counsel Unit, and by The Energy Project, and staff from NWECC has been involved in many of the low-income advisory groups. We are also involved in similar discussions in Oregon, where four of the five utilities also have operations.

We appreciate the extensive work that has gone into developing the utility's customer assistance programs, communication tools, and new outreach methods to reach customers. Already we can see some results, with auto-grant programs reaching many of their intended audiences, and some other customers coming in through manual applications.

However, in past comments, NWECC has noted that the "UTC will likely need to consider multiple factors in assessing an extension of the moratorium on disconnections, including: (1) a utility's 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." In addition, the UTC should consider the actions of other government agencies when directing the resumption of normal disconnection practices. With those additional factors in mind, NWECC **recommends that the UTC revise the term sheet to reflect a new estimated resumption date for disconnections of September 30, 2021.** Our reasons for this are manifold:

- The public health data and information from government officials indicate that the state has entered a fourth wave of COVID infections.
- Economic recovery is somewhat uncertain – while the Governor has paused phase changes for the moment, the government will reassess in the coming weeks whether to send large counties like King County back to Phase 2, due to rising COVID cases and hospitalizations.

- Federal assistance dollars are coming into the state to additionally help customers with built-up energy bills, but this assistance will take time to distribute to customers in need, and will be needed to continue to serve customers through the 2021-2022 heating season.
- While utility debt relief programs are reaching those who have interacted with the systems in the past, data from the companies indicates that a higher proportion will need to get through the system manually. It will take time, outreach, and follow-up to reach these customers.

Further, the data analysis that the Energy Project has undertaken shows that many frontline communities – those who have been historically and disproportionately affected by negative environmental impacts – are also ones who are behind on utility bills.

Continuing the utility disconnection moratorium is one action state agencies can take to provide protections to these frontline communities.

In the wake of a global pandemic, NWEAC believes that the public interest warrants a concerted effort to ensure that customers are not carrying COVID-related debt into the heating season. In light of the disproportionate impacts of the pandemic; the gap between those eligible for automatic debt relief; and the substantial numbers of households with arrearages but no history of LIHEAP or utility bill assistance, **the Commission should consider expanding automatic debt relief programs.** Relieving customer COVID-related debt during the summer, while bills are lower, will help low-income and vulnerable customers pay their heating bills later. We have before us the prospect of a large number of customers facing utility disconnections, but also the ability to do something about it.

We further recommend that the **UTC direct companies to not start collections practices until after the resumption date.** Starting collections practices as early as June 1 will be confusing for customers, and will be doubly confusing if the Governor extends the proclamation on utility disconnections further into the year.

Finally, the data on customer arrearages has been enlightening. **We support Staff's recommendation that that the Commission request this data on a monthly basis. We would further recommend that this information be consolidated into a central spreadsheet¹, and that the Commission continue requesting this data on an on-going basis,** rather than just the six months following the resumption date.

Thank you for considering our comments,

Amy Wheelless
Senior Policy Associate

¹ Oregon utilities report arrearage information monthly, which is reported here: <https://www.oregon.gov/puc/utilities/Pages/COVID-19-Impacts.aspx> (Right side - Resources & Data, Arrearages Balance)