



NW Energy Coalition
for a clean and affordable energy future

June 25, 2021

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

Re: Response to Petition for Reconsideration and Petition to Stay, U-200281

The NW Energy Coalition (NWECC) appreciates the opportunity to provide comment regarding Public Counsel's petition for reconsideration and petition to stay in Docket U-200281. Overall, we support Public Counsel's petitions and recommend that the Commission revise the term sheet and Order 03 to reflect a new estimated resumption date for disconnections of September 30, 2021 and to pause any disconnection activity until following the resumption date.

We acknowledge the extensive work that utilities and stakeholders have spent to develop utility customer assistance programs, communication tools, and new outreach methods and routes to reach customers. We also appreciate the additional consumer protection that the UTC incorporated as part of Order 03 into the term sheet, specifically the requirement that a utility contact the UTC before disconnecting any customer and that the UTC will investigate to ensure that the consumer has had access to all services available. This additional consumer protection will ensure that customers are being given access to all possible mitigation efforts, though it does come at the end of the collection process for a customer.

However, NWECC still recommends that the UTC move to prevent any disconnections for non-payment until at least September 30, 2021:

1. The data analysis that the Energy Project undertook 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 that state agencies can take to provide protections to these frontline communities. It will take time for these communities to learn about and be connected to the resources that the utilities have developed, particularly if they have never been in the system before.
2. 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.

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3. While utility debt relief programs are reaching those who have interacted with the utility systems in the past, data from the companies indicates that a higher proportion will need to get through the system manually. Again, it will take time, outreach, and follow-up to reach these customers. Given the success of the auto-grant programs thus far, we recommend that the UTC and utilities further implement **additional auto-grant/debt relief programs that can quickly get resources to more customers while reducing administrative costs for the utilities and the CAP agencies**. More discussion will be needed with advisory groups and other stakeholders to determine the best and most equitable ways to implement that, but given the scale of arrearages, it seems like a necessary step.

Thank you for considering our comments and we look forward to exploring more ways to equitably assist customers at the workshop in August.

Sincerely,

/s/

Amy Wheelless
Senior Policy Associate