Exh. DLT-12
Docket UG-240008
Witness: Daniel L. Tillis

BEFORE THE
WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION

WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION, Complainant, v. CASCADE NATURAL GAS CORPORATION, Respondent.	DOCKET UG-240008

CASCADE NATURAL GAS CORPORATION

ELEVENTH EXHIBIT TO THE
DIRECT TESTIMONY OF DANIEL L. TILLIS

March 29, 2024

U-210800

COMMENTS OF JOINT ADVOCATES
Attorney General of Washington, Public Counsel Unit,
The Energy Project, NW Energy Coalition, Front and Centered, and Sierra Club

October 17, 2022

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<u>**SENT VIA WEB PORTAL**</u>
Amanda Maxwell
Executive Director and Secretary
Washington Utilities and Transportation Commission
P. O. Box 47250
Olympia, WA 98504-7250

Re: *Rulemaking to consider potential long-term changes and improvements to customer notice, credit, and collection rules, including permanent elimination of late fees, disconnection and reconnection fees, and deposits*,
Docket U-210800

Dear Director Maxwell:

The Public Counsel Unit of the Washington Attorney General's Office, The Energy Project, Front & Centered, NW Energy Coalition, and Sierra Club (collectively referred to as "Joint Advocates") respectfully submit these comments in the ongoing rulemaking in Docket U-210800. The Joint Advocates appreciated the robust discussion at the August 29, 2022, workshop ("Workshop"). We offer additional comments to elevate and consolidate the Joint Advocates' previous written and oral comments to enhance the record and assist the Commission's decision-making in this rulemaking process.

This process is ongoing as utility customers face economic pain and uncertainty. Though year-over-year consumer price index increases are slowing month to month, consumers still face 8.3 percent price increases for essential expenses and purchases.[1] Electric bills are increasing at alarming rates. Nationwide, year-over-year electricity prices increased 15.8 percent in August 2022.[2] The National Energy Assistance Directors' Association believes that average nationwide winter heating bills will increase 17 percent compared to last year, resulting in average winter heating costs of $1,202 per household.[3] In Washington, customers of multiple investor-owned

[1] Scott Horsely, *Soaring electricity bills are the latest inflation flashpoint*, NPR (Sept. 13, 2022, 8:41 AM ET), https://www.npr.org/2022/09/13/1122371879/electricity-utilities-gasoline-gas-prices-inflation-august-cpi-consumer-prices.
[2] *Id.*
[3] Press Release, Nat'l Energy Assistance Directors' Ass'n, *Home Heating Costs Reach Highest Level in More than 10 Years Families will Pay 17.2% More for Home Heating this Winter*, (Sept. 12, 2022), https://neada.org/wp-content/uploads/2022/09/winter2022-23PR.pdf.

utilities (IOUs) may see increased power bills due to recently completed and ongoing general rate cases with multi-year rate increases. Utility bills are also increasing outside the general rate case process. Historically, many Washington IOUs file rate cases and receive revenue requirement increases on a near-annual basis. On top of base rate increases, utility customers are also facing major increases in rates due to purchased gas adjustments as a result of large increases in commodity costs.[4] These pressures are mounting as Washington's heating season nears. Although customer rate adjustments are not at issue in this proceeding, this is the context facing utility customers and the Commission as the rules for critical customer protections are reconsidered. Continuously increasing utility bills compound affordability issues, which are at the heart of customers' ability to pay and avoid disconnection.

As this rulemaking moves forward, the Commission must lead with equity. This proceeding seeks to maintain or re-imagine protections for an essential service. Washingtonians have a right to access utility services. The National Consumer Law Center's (NCLC) Customer Bill of Rights concludes that safe, reliable, and affordable access to utilities is an essential human need, and that "[n]o household should be disconnected from these essential utility services based on the inability to pay."[5] NCLC further notes that "[r]eliance on disconnections as a collections tool has the effect of punishing people for being poor, and ignores the longstanding racial and economic discrimination that have created the disparities that fuel poverty and the unaffordability of utility services."[6] Electricity, home heating, and potable water are essential to maintain healthy and productive lives.

The Commission must take heed of the disparate, inequitable outcomes facing utility customers, particularly as it relates to disconnections, deposits, and fees. Across state government, Washington agencies must "be guided by the principles of equity"[7] in "developing, strengthening, and supporting policies and procedures that distribute and prioritize resources to those who have been historically and currently marginalized, including tribes."[8] Further, "equity requires the elimination of systemic barriers that have been deeply entrenched in systems of inequality and oppression."[9] The Commission commits to be a "pro-equity, anti-racist government organization."[10] To that end, the Joint Advocates look forward to working with the Commission, Commission Staff, utilities, and other stakeholders to develop policies that fulfill that commitment to equity and anti-racism.

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[4] Docket UG-220715, Puget Sound Energy Purchased Gas Adjustment (PGA) Filing; Docket UG-220702, Cascade Natural Gas Company PGA Filing; Docket UG-220697, NW Natural Gas Company PGA Filing; UG-220670, Avista Corporation PGA Filing.
[5] Nat'l Consumer L. Ctr., *Essential Utility Services During the COVID-19 Pandemic and Beyond: A Roadmap to Utility Service as a Human Right* (2021), https://www.nclc.org/wp-content/uploads/2022/08/IB_Utility_Service_Principles.pdf.
[6] Nat'l Consumer L. Ctr., *Implementing a Roadmap to Utility Service as a Human Right*, at 1 (2021), https://www.nclc.org/images/pdf/special_projects/covid-19/IB_Utility_Bill_of_Rights.pdf.
[7] RCW 43.06D.020(3)(a).
[8] RCW 43.06D.020(3)(a)(i).
[9] RCW 43.06D.020(3)(a)(ii).
[10] *Pro-Equity Anti-Racism (PEAR)*, Wash. Utils. & Transp. Comm'n, https://www.utc.wa.gov/PEAR (last visited Oct. 17, 2022).

Our joint comments reiterate recommendations for issues addressed in this rulemaking: (1) discontinue disconnections for non-payment; (2) discontinue customer deposits and fees; (3) ensure all IOUs offer Arrearage Management Programs (AMPs) and offer payment plans that promote equity as alternatives to disconnections; (4) require IOUs to continue and expand meaningful outreach and community partnerships to promote bill assistance enrollment; and (5) reduce barriers to enrollment in assistance programs. Pursuing the Joint Advocates' recommendations will advance equity and better ensure that customers are able to access affordable utility service.

Below, we expand on these recommendations and respond to several recurring themes that arose during the Workshop:

- Equity,
- The "free-rider problem,"
- Disconnection as a "necessary tool of last resort,"
- Community trust, and
- Barriers to accessing bill assistance.

Equity

All stakeholders responded to the theme of equity in the context of disconnections at the Workshop, deposits, and fees. Generally, the Joint Advocates pointed to research that demonstrates disconnections and fees promote racial disparities and other inequities. Utility representatives indicated that it is inequitable for customers staying current on their bills to subsidize those who are not paying.

As indicated above, the state of Washington and the Commission are committed to advancing equity through policy. Equity issues are at the heart of the rules being examined in this docket. Therefore, it is critical that the rules for disconnections, deposits, and fees place equity at the forefront.

As indicated during the Workshop and in written comments, research shows that households headed by people of color are more likely to receive disconnection notices than white households at similar income levels.[11] Black households spend a higher share of their income on energy expenses than non-Black households.[12] Among low-income households, Black low-income

[11] Anna Kowanko & Charlie Harak, *More Can and Must Be Done to Prevent Utility Consumers from Losing Service Due to Mounting COVID-Driven Arrearages in Massachusetts and Other States,* at 2 (Nat'l Consumer L. Ctr. 2021), https://www.nclc.org/images/pdf/special_projects/covid-19/Rpt_More_Covid_Util_Arrearage_Svc.pdf.
[12] American Association of Blacks in Energy (AABE), *Energy, Economics, and the Environment: Effects on African Americans*, at 1 (AABE 2004), https://www.aabe.org/docs/whitepapers/docs/1-State-of-Energy-in-Black-America-Report.pdf.

households spend more money on energy than non-Black low-income households.[13] Ultimately, Black households are more likely to be disconnected from utility service than white households at similar income levels.[14] An analysis of zip code level utility disconnection data in California found that Black and Latinx households disproportionately experienced utility shutoffs.[15] In addressing disconnection policies for Washington IOUs, the Commission should consider these well-documented racial disparities resulting from disconnections.

Research also indicates that low-income households are at greater risk of disconnection for non-payment than higher income households because "utility costs often make up a larger portion of expenses for households with limited extra income."[16] By extension, low-income households are more sensitive to utility rate increases than higher earning households. Analysis of Washington IOU arrearage data reveals that arrearages fall disproportionately on vulnerable communities. The Energy Project conducted close analysis of arrearage data for multiple time periods during the last few years. This analysis repeatedly demonstrated that arrearages are concentrated in named communities and communities with higher shares of people of color.[17] For example, recent analysis of Puget Sound Energy's top five zip codes with highest residential arrearages shows those five zip codes disproportionately include people of color and highly impacted communities.[18] Those with higher levels of arrearages are at greater risk of disconnection, and it follows that Washington's named communities face a higher threat of disconnection based on The Energy Project's extensive analysis.

Customers in arrears are also more likely to be subject to late payment and additional fees and a deposit when they start or resume utility service. If customers are ultimately disconnected for non-payment, then they would likely be subject to a disconnection and reconnection fee upon resumption of service. In addition to outstanding arrearages, customers who fall behind on their bills would face even more financial obligations and difficulties as the result of fees and deposits. Simply put, these fees penalize people who are facing financial hardship. It is expensive to be disconnected and the related charges serve to reinforce the cycle of poverty. At the Workshop, a utility representative commented that it is a faulty assumption to claim that customers facing fees are low-income or impoverished. This claim is not supported by evidence. The Energy Project's

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[13] *Id.*
[14] Marcus Franklin & Caroline Kurtz, *Lights Out in the Cold* (NAACP 2017), https://naacp.org/resources/lights-outcold.
[15] Gabriela Sandoval & Mark Toney, *Living Without Power: Health Impacts of Utility Shutoffs in California* at 17 (TURN 2018), http://www.turn.org/wp-content/uploads/2018/05/2018_TURN_Shut-Off-Report_FINAL.pdf.
[16] *Id.*
[17] Charlee Thompson and Mary Kimball, *Summary of the Effects of COVID-19 on Washington's Investor-Owned Utility Residential Customers,* at 12–17, The Energy Project (filed in Docket U-200281 on June 24, 2022). *See also,* Supplemental Comments of The Energy Project, *In re: Regulated Util. Response to COVID-19 Pandemic*, Docket U-200281 (filed May 7, 2021) (*see esp.* Attach. B).
[18] The Energy Project Analysis presentation slide deck, for June 15, 2022 Technical Workshop, at 8, *In re: Regulated Util. Response to COVID-19 Pandemic*, Docket U-200281 (filed June 16, 2022).

aforementioned analysis provides some indication that customers charged fees and deposits are more likely to be in a vulnerable or highly impacted community.

Discontinuing disconnections, deposits, and associated fees would be an elegant policy solution to address the inequities associated with these practices and arrearages. The Joint Advocates agree with the utilities that delivering bill assistance and offering comprehensive AMPs (that include a debt relief component) to qualifying customers would ultimately reduce the risk of disconnection for non-payment because customers' bills would become more affordable, resulting in more equitable outcomes. However, at this time, all IOU bill assistance programs are undersubscribed based on needs assessments. In addition, AMPs are not offered by all utilities. Ultimately, the tools are not currently in place to make customer bills affordable through various programs. The National Association of Regulatory Utility Commissioners and the National Association of State Utility Consumer Advocates jointly recognize the value of evidence-based policy.[19] The importance of evidence-based policymaking, coupled with the Commission's commitment to developing pro-equity anti-racist policies and the evidence the Joint Advocates have presented in this proceeding, indicates that the rules should be amended to forbid disconnections for nonpayment. Discontinuing disconnections for nonpayment, deposits, and fees is the best available policy option to address inequities and disparities that have only deepened as a result of the COVID-19 pandemic.

During the workshop, some utilities indicated that it would be inequitable to make all customers cover the cost of customers not paying their bills. However, this argument does not hold water, as the current regulatory structure *already* socializes costs related to non-payment: utilities are able to recover uncollectibles and bad debt through rates. These issues are regularly addressed in general rate cases. Further, utilities socialized the cost of the COVID-19 emergency relief and have long socialized the costs of rate-based bill assistance programs. Our current regulatory system encourages socialization of costs to ensure financially distressed customers remain connected to essential utility service and that any non-payment is recoverable.

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[19] Nat'l Ass'n of State Util. Consumer Advoc., *Resolution 2019-07 on Best Practices in Data Collection and Reporting for Utility Services Delinquencies in Payments and Disconnections of Service* (approved Nov. 18, 2019), available at https://nasuca.org/wp-content/uploads/2018/11/2019-07-NASUCA-Data-Collection-Resolution-Joint-with-NARUC-Final.pdf.

The "free-rider problem"

In written and verbal comments, the utilities claim that if disconnections are disallowed, people will simply stop paying their bills even if they have the financial means to do so. These claims are based on anecdotes, not actual data. Data suggests that financially distressed customers make utility bill payments to avoid shutoff by forgoing other necessary expenses, including food, housing, and medication.

Responding to the possibility of ending disconnections for non-payment, the utilities have been unified in the message that many customers will stop paying their bills even if they have the financial means to pay on time and in full. Essentially, the fear is that customers will become "free-riders" if they believe there are "no consequences" for not making payments. This premise has been asserted in this proceeding and Docket U-200281. However, it has been presented without any data or evidence to demonstrate that this was or would be a widespread problem. Rather, utilities have relied on anecdotes from the end of the Commission's and Governor's emergency moratoria on disconnections. Removing the utilities' ability to disconnect for non-payment does not remove a customer's responsibility for past-due balances.

Research demonstrates that people in financial distress tend to cut back on or forgo paying basic household expenses, such as food and medicine, to afford their energy bills.[20] In the Puget Sound Region, people are making similar choices when faced with unaffordable energy bills. A 2020 Puget Sound Sage study that reveals many King County residents choose between paying energy expenses and rent or mortgage payments, food, medicine, childcare, or eldercare when their bills increase by $50 per month.[21] While the utilities claim, based on anecdotes alone, that people will simply not pay their utility bills without the ability to threaten disconnection, the reality is that people make gut-wrenching choices between basic expenses necessary for survival when faced with the reality that they could lose power, heat, or water.

Ultimately, this argument against discontinuing disconnections reinforces harmful and inaccurate narratives about low-income people. The idea that people "choose not" to pay their bills suggests that low-income people are lazy and that their choices have created the conditions of poverty. Ultimately, this propels stigma and defeats efforts of gaining community trust before they even begin. Our comments will further address this below. Moreover, any risk that ending

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[20] *See* Sanya Carley, David Konisky, & Trevor Memmott, *Household Energy Insecurity Survey,* at 5*,* Energy Justice Lab (Winter 2021-2022), https://energyjustice.indiana.edu/doc/ejl-energy-insecurity-report-winter-2022.pdf. *Also see* AABE, *Energy, Economics, and Environment: Effects of African Americans*, at 31 (2004). https://www.aabe.org/docs/whitepapers/docs/1-State-of-Energy-in-Black-America-Report.pdf. *Also See* Gabriela Sandoval & Mark Toney, *Living Without Power: Health Impacts of Utility Shutoffs in California*, at 6 (TURN 2018), http://www.turn.org/wp-content/uploads/2018/05/2018_TURN_Shut-Off-Report_FINAL.pdf.

[21] Banerjee, et al., *Powering the Transition: Community Priorities for a Renewable and Equitable Future*, at 43 (Puget Sound Sage 2020), https://www.pugetsoundsage.org/wp-content/uploads/2020/06/PugetSoundSage_PoweringTransition_June2020-1.pdf.

disconnections may marginally increase nonpayment must be weighed against the very real, serious, and well-documented impact of allowing shutoffs for nonpayment: leaving the most vulnerable among us without essential utilities or forcing them to choose between heat and food, housing, or medical care.

During the depths of the COVID-19 emergency, customer arrearages reached very high dollar amounts, particularly for those with arrearages of 90 days and more. Through emergency debt relief, large shares of arrearages for low-income customers were eliminated. However, several IOUs indicated during the Workshop that the total dollar amount of arrearages is climbing once again. Analysis by The Energy Project found that residential arrearages were at record high levels of $93 million as of March 2022, and Known Low Income arrearages had grown 28 percent from March 2020 to March 2022, from $10 million to $13 million.[22] Although we do not have definitive insight into the specific drivers of this problem, we do know that (1) the IOUs were not widely advertising to customers that disconnections were halted during the pandemic and (2) utilities currently have the ability to and are indeed sending disconnection notices to customers. Even with the ability to notify customers about an impending disconnection non-payment, utility customers are once again falling behind.

Disconnections as a "necessary tool of last resort"

The utilities indicate that disconnections are an essential tool to not only ensure customers make timely payments, but also as a final effort to get customers entered into a payment arrangement or assistance program. Data suggests that is not necessarily true and the disconnection threat creates more harm than good.

The utilities have indicated that disconnection notices and the threat of potential disconnection offer a critical last resort opportunity to connect customers to assistance and, ultimately, are a tool to ensure customers pay. Utilities claim that disconnection notices are a strong tool to induce customer payment or enrollment in bill assistance or repayment plans. A report from The Utility Reform Network (TURN) tells a different story. Based on analysis of California utility disconnection notices and shutoffs between 2010 and 2016, the number of customer disconnections increased significantly even as the number of disconnection notices issued notably decreased.[23] If the utilities' claims about the effect of disconnection notices were true, it logically follows that that the number of disconnection notices issued would positively correlate with the number of customers disconnected. TURN's report illustrates the opposite trend. From this analysis, disconnection notices are not necessarily a last resort as utilities claim, but instead the California utilities seem to be using disconnection itself as a collections strategy.[24] Looking

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[22] Charlee Thompson and Mary Kimball, *Summary of the Effects of COVID-19 on Washington's Investor-Owned Utility Residential Customers,* at 4, The Energy Project (filed in Docket U-200281 on June 24, 2022)..
[23] Gabriela Sandoval & Mark Toney, *Living Without Power: Health Impacts of Utility Shutoffs in California*, at 28 (TURN 2018), http://www.turn.org/wp-content/uploads/2018/05/2018_TURN_Shut-Off-Report_FINAL.pdf;
[24] *Id*. at 28.

at Washington utilities, the IOUs are currently able to send disconnection notices and disconnect customers, yet arrearages are once again reaching record high levels.[25]

Since the end of the Commission's moratorium on disconnections, Commission Staff have provided a critical, but temporary, protection for customers by reviewing every potential customer disconnection in advance. Consistent with Commission order in Docket U-200281, Commission Staff's review of all disconnections in process ended October 1, 2022. The process ensured that utilities completed all mandated steps and all efforts to reach out to customers have been exhausted. This process was also used to inform customers about bill assistance and payment plan options. In written comments filed August 19, 2022, however, all five utilities advocated against this process while it was still in effect citing concerns about a "bottle neck" in the process and "imped[ing] [their] business practices."[26] If it is understood that disconnections are truly a necessary tool of last resort, it is reasonable that the regulator should verify that all steps have been taken to ensure customers are not improperly disconnected from service.

Premise visits are a necessary protection for customers facing disconnections for nonpayment, and the Joint Advocates have supported this measure. These visits provide another opportunity to offer bill assistance options or make payments to prevent disconnection. All of the electric utilities opposed premise visits to all customers facing disconnection for nonpayment in comments.[27] Despite arguing that disconnections are truly a last resort option for payment or offering assistance, the electric utilities do not support premise visits.

Ultimately, building community trust and conducting meaningful outreach to customers is necessary to keep customers connected to essential utility services and access the programs available to them. Disconnections erode community trust and are not a substitute for outreach, which should be iterative and continuous.

Building Community Trust

Historic inequities have eroded trust in institutions, including utilities, among vulnerable and marginalized communities. Establishing this trust is critical to building relationships, connecting customers to programs, and keeping customers connected to utility service.

Community trust is a critical component to keeping customers connected to utility service, and it was a consistent theme in conversation at the workshop. Ultimately, all stakeholders present agreed that building community trust is essential to enrolling more customers in payment plans

[25] Similar analysis of the relationship between Washington IOU numbers of disconnections versus disconnection notices issued cannot be properly assessed with data available in U-200281. The available data does not stretch far enough before 2020, and the data regarding disconnection rates from 2020 onward is not normalized due to the state moratorium.
[26] Second Comment Matrix, Question 17c, Docket U-210800 (filed Aug. 25, 2022).
[27] Second Comment Matrix, Question 17a, Docket U-210800 (filed Aug. 25, 2022).

and bill assistance. It was also acknowledged that it is a difficult problem that will take time and effort to solve. Utilities, such as Avista, have found success with their efforts in partnership with community-based organizations to build awareness of bill assistance offerings and ultimately getting eligible customers enrolled.

Advocates at the Workshop noted that continuing the practice of disconnections will ultimately harm efforts to build relationships with highly impacted and vulnerable communities. As noted above, threatening to disconnect customers for non-payment is not a substitute for meaningful outreach. It makes logical sense that customers who historically only received communication from their utilities in the form of late payment notices, disconnection notices, and collections efforts would be suspicious of communications regarding bill assistance or other available programs. Additionally, disconnections have a stigmatizing effect on poverty and customers who are unable to pay. This, in turn, does little to build trust with utilities.

Research indicates that keeping customers connected to utility service not only benefits customers at risk of disconnection, but also benefits all utility ratepayers. A 2013 NCLC study found that AMPs provide overall cost savings to utilities.[28] When customers are enrolled in an AMP, utilities do not incur disconnection, collections, or bad debt costs and utilities collect more through bill payments from customers in AMPs than when they are not enrolled.[29] These cost savings are passed along to all customers resulting in lower overall rates.

Utilities must partner with and fund trusted community-based organizations to build trust and ultimately keep named communities connected to utility service. This will take consistent investments and effort on the part of utilities. Although work is being done in this respect, bill assistance programs being undersubscribed indicate that work is left to be done. A 2020 report from Puget Sound Sage revealed that many customers simply do not know they are eligible for assistance programs or find it too onerous to apply.[30] That indicates that outreach is necessary to build awareness and promote enrollment. This study suggests that lack of meaningful, continuous outreach is the explanation for under-enrollment assistance programs, rather than the notion that customers simply are not seeking the energy assistance available to them.

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[28] Charlie Harak, *Helping Low-Income Utility Customers Manage Overdue Bills through Arrearage Management Programs (AMP)*, at 20 (NCLC 2013), https://www.nclc.org/wp-content/uploads/2022/09/amp_report_final_sept13.pdf.
[29] *Id.*
[30] Banerjee, et al., *Powering the Transition: Community Priorities for a Renewable and Equitable Future*, at 47 (Puget Sound Sage 2020), https://www.pugetsoundsage.org/wp-content/uploads/2020/06/PugetSoundSage_PoweringTransition_June2020-1.pdf.

Reducing Barriers to Enrollment in Programs

The process to enroll in assistance programs can be complex and difficult to understand. Reducing or eliminating these barriers is a critical aspect of increasing enrollment and keeping customers connected to utility services.

Puget Sound Sage's 2020 report illustrates why customers are not getting connected to programs for which they are eligible. Approximately three percent of eligible customers turn down bill assistance that is offered.[31] However, most eligible customers, according to the study, do not pursue assistance because they either did not think they were eligible or the process to apply is too onerous.[32] Additionally, many customers believe they are not eligible for bill assistance even when it is likely they are eligible.[33] As such, in addition to improved outreach, it is necessary for utilities to revise the steps necessary to enroll in assistance programs to ensure that eligible customers are not remaining vulnerable to disconnection because they do not understand or simply become frustrated by the enrollment process.

In this Docket and Docket U-200281, the Joint Advocates have recommended that utilities pursue self-certification, auto-enrollment, and minimizing paperwork for enrollment in bill assistance. Self-certification and auto-enrollment remove multiple steps to enrollment and eliminate the need to provide pay stubs, which may be difficult for people who do not have a long employment history, work multiple jobs, or are paid in cash. Additionally, reducing paperwork — including actual paper — will make the process simpler and easier to understand. Many people may not have access to printers or other devices that would be necessary to provide paperwork to the community action agencies that facilitate enrollment. PSE and Avista are pursuing bill discount programs that permit self-attestation for enrollment. Program evaluations from Seattle City Light show very promising results from self-attestation. The study found self-attestation to be "6x as effective as marketing alone" and "8x more effective than the status quo [enrollment] method."[34] Self-attestation is one effective way utilities can reduce barriers to enrollment in bill assistance and, thus, keep more customers connected to essential utility service.

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[31] *Id.* at 47 (Figure 35).
[32] *Id.*
[33] *Id.* at 47.
[34] Seattle City Light, *Using Behavioral Science to Increase Program Enrollment*, https://www.seattle.gov/Documents/Departments/Performance/IP%20Case%20Study_UDPSelfCertification.pdf/ (last visited Oct. 17, 2022).

Next Steps

- Convene a workshop with direct service providers or other organizations who work directly with vulnerable utility customers experiencing financial distress. This will allow the Commission to gather more information and evidence about the experiences of those who work directly with community members.
- Convene a workshop to discuss fees, deposits, and credit reporting. These topics were not covered in great detail at the August 29 Workshop.
- Continue to review and seek data and research to guide decision making.

The Joint Advocates respectfully submit these comments to synthesize and supplement the record in this proceeding. As individual stakeholders, we continue to maintain previously filed comments and encourage further exploration of the research and data in previous comments. The Advocates look forward to continued dialogue on these critical subjects. If you have any questions about these comments, please contact either of the undersigned.

Sincerely,

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