



October 7, 2024

Dear Commissioners,

In light of the rate increase proposed by Puget Sound Energy (PSE), and the impact this increase will have on our most vulnerable residents, we, the representatives of the North Urban Human Services Alliance (NUHSA) an advocacy organization composed of human service providers, faith leaders, city staff and council members, and the community at large are writing to advocate for critical improvements in the way low-income energy discount programs are administered.

Specifically, we urge the Washington State Utility and Transportation Commission (UTC) to require, as a stipulation of the approval of PSE's requested rate increase, 1) the adoption of the use of Area Median Income (AMI) as the basis for qualifying individuals and families for these vital programs, and 2) to further examine the percentage discount that is received by Very Low Income (50% AMI) and Extremely Low Income (30% AMI) residents.

Our communities face diverse economic challenges, and many residents struggle with managing energy costs. The current income qualification criteria for energy assistance programs don't account for regional variations in living costs and economic conditions. This mismatch can lead to a gap between the support provided and the actual needs of residents, a gap that local human service providers are being called to fill. Recently the state acknowledged this gap by changing their own energy assistance and rebate programs to use local AMI rather than the Federal Poverty Standard.

The use of Area Median Income for income eligibility, instead of Federal Poverty Level limits, would allow for more equitable and effective support, particularly in high-cost regions like the Seattle metro area, where residents face greater financial strain. By requiring AMI as the qualification standard, the UTC can help provide more accurate eligibility assessments and tailored assistance that better meets the needs of all residents.

We respectfully request that the UTC consider this proposal and take the necessary steps to 1) incorporate Area Median Income into the qualifications for low-income energy programs, and 2) reevaluate the percentage discount that is received by Extremely Low Income (30% AMI) and Very Low Income (50% AMI) households. These changes would represent a significant step forward in addressing the diverse needs of our communities, ensuring that all residents have access to the support they need, and protecting our most vulnerable residents from the substantial energy rate increase that has been requested. Thank you for your attention to this important issue and appreciate your efforts towards a positive resolution that will benefit our collective communities.

Sincerely,

Sarah Arndt
Senior Manager, NUHSA