

April 7, 2020

Mark L. Johnson
Executive Director and Secretary
Washington Utilities and Transportation Commission
621 Woodland Square Loop S.E.
Lacey, WA 98503

Re: Investor Owned Utilities' Low-income Energy Assistance Programs
Emergency Responses to COVID-19 Including Open Meeting Items on April
10th from Avista Utilities and Puget Sound Energy

Dear Mr. Johnson:

The Energy Project (TEP) respectfully submits the following comments regarding recent communications with each of the Investor Owned Utilities' (IOU's) respective energy assistance advisory groups and with PacifiCorp, which does not currently have an energy assistance advisory group. The letter summarizes the responses from each of the IOUs as we understand them at this point in time. We understand that related filings by PSE and Avista may be on the April 10 Open Meeting Agenda, although they are not as of this writing.

On March 23, 2020, TEP submitted to each of the IOUs a letter (attached) addressing our concern that a "business as usual" approach to energy assistance will be inadequate to meet the expected increased demand for services. Our recent communications with the Community Action Partnership (CAP) organizations and other low-income service providers indicates that while demand for immediate needs such as food and assistance with housing expenses are paramount at this point in time, the need to maintain access to affordable electricity and natural gas utility services will soon be a high priority for many Washingtonians impacted by this crisis.

CAP agencies are also preparing this week to enter into contract modifications with the WA State Department of Commerce to begin deploying funds made available through the federal CARES Act recently passed in response to economic impacts from COVID-19. Washington State funds range from more than \$11 million in additional LIHEAP for utility assistance, tens of millions of dollars from Community Service Block Grant funds for emergent needs, Childcare assistance funds, and many additional programs and funds.

Avista

In response to TEP's request for an emergency LIRAP (Low-Income Rate Assistance Program) Advisory Committee meeting, the company scheduled a meeting on March 26, 2020, where potential changes to LIRAP were discussed. In a letter dated April 2, 2020, Avista filed a tariff revision for LIRAP



Shawn Collins
Director

3406 Redwood Ave.
Bellingham, WA 98225

shawnc@oppco.org

(360) 389-2410

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Schedule 92 which incorporates modifications to LIRAP worked out with input from the agencies delivering LIRAP, as well as with approval from the LIRAP Advisory Committee. TEP applauds Avista's thoughtful and team-based approach to address the needs of their customers and is in full support of the program modifications.

Cascade Natural Gas

In response to TEP's request for an emergency WEAFF (Washington Energy Assistance Fund) Advisory Committee meeting, the company responded by scheduling that meeting on March 26, 2020, where potential changes to WEAFF were discussed. The company responded with a proposal to the WEAFF Advisory Committee on April 3, 2020. While the recommendations are still under review by the committee at this time, the company responded to the issues brought up by TEP, the CAP agencies and other WEAFF Advisory Committee members. We are very appreciative of the company's rapid response to their customer's needs and expect to have a proposal for Commission review very soon.

NW Natural Gas

In response to TEP's request for an emergency GREAT (Gas Residential Energy Assistance Tariff) Advisory Committee, the company responded by scheduling a meeting on March 25, 2020, where potential changes to GREAT were discussed. While there are no formal changes to the program submitted to the Commission at this time, we thank the utility for their speedy response in scheduling the meeting and look forward continued conversations with the newly formed GREAT Advisory Committee to request adaptations to the program as needed in response to the crisis.

PacifiCorp

In response to TEP's request, for an emergency meeting with the utility and LIBA (Low-Income Bill Assistance) program stakeholders and the company responded promptly with scheduling a meeting on March 25, 2020. Potential changes to LIBA were discussed. While there are no formal changes to the program for submission to the Commission at this time, we are appreciative of the utility for their quick response in scheduling the meeting and look forward continued conversations with them on this matter.

PSE

Following the March 23 letter, TEP also reached out to PSE directly in hopes of scheduling an emergency meeting to discuss expected impacts of COVID-19 to their Home Energy Lifeline Program (HELP). Unfortunately, the company was not initially responsive to scheduling a HELP Advisory Committee meeting. TEP therefore, communicated with Advisory Group stakeholders to schedule a meeting on April 2, 2020. The meeting included PSE, TEP, Public Counsel, NWECA, Commission Staff, company staff and CAP agencies. At this meeting the company notified the Advisory Group members and the CAP agencies delivering HELP of their plan to file with the Commission a request to form a new assistance program separate from HELP. Although it is TEP's

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Director

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shawnc@oppco.org

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a program of:



understanding the PSE has been developing this proposal for a number of weeks, and negotiating details with Commission Staff, no specific proposal had been previously presented to the Advisory Committee, to TEP directly, or with affected Community Action Agencies. At the April 2 meeting, PSE provided a verbal overview of the program. No written version of the proposal and no supporting documentation was provided to HELP Advisory Committee members or agencies to review.

While TEP is supportive of the company's desire to assist their low-income customers impacted by COVID-19, participants on the April 2nd call had a number of concerns arising from the lack of Advisory Group stakeholder input in the development of their proposal, including:

- Potential complications that running a parallel program may present to customers accessing not only energy assistance but also host of other federal and state funded programs being offered to COVID-19 impacted low-income PSE customers through the CAP agencies,
- Cross subsidization between gas and electric customers (the majority of unspent HELP funds from previous years are primarily gas funds, which TEP is excited to see put to use during the response to this crisis),
- The lack of proposed modifications to the existing HELP program to accommodate increased demand for assistance,
- Customer confusion, multiple and inconsistent application processes, and eligibility requirements, and
- Concerns about unequal accessibility to the PSE program for customers with limited on-line capability.

To continue the discussion of these issues, there is another meeting with HELP Advisory Committee members today on April 7th. TEP reiterates that we are eager to work with the company and stakeholders to ensure that there is a comprehensive and collaborative approach to addressing the needs of low-income PSE customers. We remain hopeful that these concerns can be worked through and a proposal supported by the HELP Advisory Committee can be submitted to the Commission for review.

The Energy Project again commends the investor owned utilities for their commitment to ensuring that their low-income customers are able to stay connected to essential utility services during this unprecedented social health crisis which is creating substantial economic turmoil and uncertainty. A representative from TEP will be available to answer any questions you may have at the open meeting on April 10, 2020.

Sincerely,



The Energy Project

Shawn Collins
Director

3406 Redwood Ave.
Bellingham, WA 98225

shawnc@oppco.org

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