

From: [Stina Janssen](#)
To: [UTC DL Records Center](#)
Subject: COMMENT Docket # U-200281
Date: Wednesday, July 1, 2020 8:04:02 PM

Dear Commissioners,

This is a comment regarding Docket # U-200281.

My name is Stina Janssen. I am the Executive Director of a non-profit organization called Firelands Workers United, serving low-wage workers in Grays Harbor and Pacific County, WA.

Since early March 2020, we have been working closely with families who have suffered tremendous loss of income due to COVID-19. These families are served by the Grays Harbor PUD and the Pacific PUD. Many of the families we serve are immigrant families who worked in industries highly impacted by the pandemic. They were also not eligible for most relief or unemployment benefits. One of the expenses they could not afford was their light and heating bills. As a small organization, we were quickly overwhelmed by the number of calls we received from families unable to pay their light bills.

Information access and clear communication: The PUDs stated on their websites that a customer unable to pay their bill due to COVID-19 could call or email to request a payment plan. We drafted a sample letter for families to send to their PUD, but most did not have access to email. We made calls to the utilities to interpret for families; the PUDs did not have Spanish-speaking staff. We worked with families to call their PUD to request payment plans, however, no formal information was given to the customers. A verbal "pay what you can," was shared by staff. I truly appreciate that utility staff have been overwhelmed, without clear directives. None of us is prepared for the circumstances of a pandemic. Yet, without any clear information, customers ended their calls without assurity their utilities were going to stay on, feeling as if the decision to shut off utilities could be arbitrary, after the moratorium expired (if they were still owing outstanding bills, which they would be, without sufficient income to catch up). We raised money to provide volunteer stipends for a trained team of bilingual team of 11 Community Information Promoters. These Promoters assisted families to apply for LIHEAP and other local resources. Our program served 200 families by providing detailed information and assistance in applying for LIHEAP through our Community Action Project. Unfortunately, private non-profits in the area have been plugging up the holes of our public services. **We hope that recommendations to WA state public utilities include that utilities should provide language-accessible information by mail and phone *with interpretation* for those customers without access to the internet and with limited English. We also hope the recommendations state that utilities provide written records of payment plans so that customers can be assured their utilities will remain on as they pay the amount agreed to.**

LIHEAP is not sufficient, more resources are needed and they should be allocated through the utilities, not a separate agency: Despite our best efforts, the resources available in our communities were soon exhausted. LIHEAP is only available once annually to families who qualify -- and is not available to many immigrant workers -- and although it was made available one more time in the year due to COVID-19, this resource should now be considered exhausted for our region for this year as many families were forced to apply for

and use LIHEAP twice already, due to the crisis. When fall and winter come and home energy heating costs go up, these families will have used their LIHEAP funds and will not be eligible for assistance. There are no other energy assistance resources in our community. (Salvation Army told us their resources were for Salvation Army program participants only). As we've outlined above, the process of navigating hard-to-reach non-profits and PUDs, exclusive applications, and then experiencing denials has been an agonizing experience for many of our families. **We urge the recommendations to support ample investment in utility assistance, and to make this assistance and/or payment reductions available at the point-of-payment (on-bill) rather than requiring customers to seek utility assistance through a separate agency.** We recognize this will require significant investment from the state and we are participating in evaluating opportunities for more progressive revenue, given the state budget shortfall.

Keep the lights on for hurting families by improving affordability and maintaining the household's connection to utility service: Utility service is essential for Washington citizens to follow COVID 19 guidelines, protect household health, and survive the social and economic challenges in employment, education, and family and social connection. It's essential for cooking, for children to study and learn, and for charging cell phones - usually our constituency's only form of communication. For households that are connected, maintaining a reasonable and affordable monthly payment is essential to remaining connected. We urge recommendations to establish clear deferred payment plans that eliminate down payment requirements, extend permitted time frame for bill repayment to a minimum of 6 months, and improve flexibility of bill payment options (For example Avists provides good flexibility with multiple billing/payment options). We also urge that recommendations require utility adoption of arrearage management plans consistent with the successful Avista AMP program for all IOU's. We also urge the recommendation of expanded availability of PIPPs (under PIPPs, participants pay a percentage of their gross income toward utility bills). Finally, we urge recommendations to require reconnection of service without fees or requirement to pay arrearages for all disconnections occurring throughout the duration of the economic crisis, and at least minimum through the 2020 calendar year; and recommendations to extend the disconnection moratoria for residential households impacted by COVID-19 throughout the duration of the economic crisis, and at least minimum through the 2020 calendar year.

Minimize debt by waiving or eliminating fees: The families I work with were one paycheck away from losing their housing or utility service. By mid-March, almost 100% of the 200 families we were in touch with were without work. As of today, only some are being called back to work. This means that many -- those without eligibility to unemployment benefits -- are now facing 100% loss of their income lasting 3.5 months. The process to rebuild their savings and to pay back-rent and owing utility bills will take time. With a spike in new COVID-19 cases, we also have to assume the path to economic recovery will not be a linear one and will include stops and starts of economic activity. With late fees, disconnection fees, reconnection fees, and more, losing one's income can become extremely expensive, and debt can be more and more impossible to climb out of. **We urge recommendations to waive and eliminate fees charged for credit and collection actions in addition to the cost of utility service are a serious barrier to initiating, reestablishing, and maintaining continuing utility service: eliminate all late payment fees; waive all past accrued late payment fee; eliminate security deposit requirements for all residential accounts established throughout the duration of the economic crisis, and at least minimum through the 2020 calendar year; eliminate all reconnection fees for residential accounts throughout the duration of the economic crisis, and at least minimum through the 2020 calendar year.**

I am calling on the Utilities and Transportation Commission to do everything in its power to ensure that people have access to stable, debt-free utility service during this pandemic and beyond.

Thank you for your consideration,
Stina Janssen

Stina Janssen
(360) 301-3340
Executive Director Directora Ejecutiva
FIRELANDS Workers United Trabajadores Unidos
FirelandsWA.org

Working people fighting for rural and small town WA.
Trabajadores peleando por los pueblos rurales de WA.