

**BEFORE THE WASHINGTON  
UTILITIES AND TRANSPORTATION COMMISSION**

In the Matter of  
Response to the COVID-19 Pandemic

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DOCKET U-200281

**JOINT COMMENTS ON BEHALF OF THE  
OFFICE OF THE ATTORNEY GENERAL  
PUBLIC COUNSEL UNIT,  
THE ENERGY PROJECT,  
NW ENERGY COALITION,  
PUGET SOUND SAGE,  
FRONT & CENTERED, AND  
SIERRA CLUB**

**December 1, 2020**

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## I. INTRODUCTION

1. On October 20, 2020, the Utilities and Transportation Commission’s (“Commission”) issued Order 01 in this docket extending the disconnection moratorium through April 30, 2021. The Commission also asked members of the workgroup established in this docket to suggest health and economic metrics for the Commission to consider when it reassesses the coronavirus pandemic conditions in early February 2021.<sup>1</sup> Pursuant to Order 01, the Public Counsel Unit of the Washington State Attorney General’s Office, The Energy Project, NW Energy Coalition, Front & Centered, Puget Sound Sage, and Sierra Club (known collectively as “the Advocates”) submit the following comments.

## II. OVERVIEW

2. As the Commission recognized, it must evaluate the pandemic conditions — both health and economic conditions — before it can determine whether to lift the moratorium on disconnections for nonpayment and imposition of late and reconnection fees.<sup>2</sup> A recent Duke University study concluded that “eviction, electricity, and water utility moratoria have played an important role in containing the COVID-19 pandemic and one that should be carefully considered as these moratoria are lifted.”<sup>3</sup>

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<sup>1</sup> *In the Matter of Response to the COVID-19 Pandemic*, Docket U-200281, Order 01: Extending Suspension of Disconnection of Energy Services for Nonpayment and Adopting Related Requirements, Appendix A under “Data and Reporting” (Oct. 20, 2020).

<sup>2</sup> *Id.*, Appendix A under “Disconnection Moratorium” (“Assess the health and economic conditions during its first open meeting of February 2021, or at a recessed open meeting around the same time.”).

<sup>3</sup> Kay Jowers, Christopher Timmins, and Nrupen Bhavsar. *Policy in the Pandemic: Housing Security Policies Reduce U.S. COVID-19 Infection Rates*, DUKE UNIVERSITY NICHOLAS INSTITUTE FOR ENVIRONMENTAL POLICY SOLUTIONS (June 29, 2020), available at <https://nicholasinstitute.duke.edu/articles/policy-pandemic-housing-security-policies-reduce-us-covid-19-infection-rates>. The study also noted that the impacts on landlords and utilities is not well understood. The data the Commission requires the utilities to provide will aid the Commission in understanding the impact on Washington utilities.

3. In addition, unlike general economic downturns resulting in unemployment and loss of earnings across all sectors of the economy, the pandemic has had a disparate impact on specific communities and households. People of color have experienced higher rates of infection and death, low-wage workers in entertainment and hospitality businesses have experienced astonishingly high unemployment rates, and lack of child care has impeded women of all incomes from gaining full employment. It is incumbent upon the Commission to take these disparate impacts into consideration when responding to the crisis.

4. The Commission’s decision to evaluate health and economic conditions before lifting restrictions on disconnections and fees recognizes that the pandemic is a fluid situation. Indeed, the number of COVID-19 cases and hospitalizations in Washington has steadily risen since September. The number of new cases doubled in the first two weeks of November, and hospitalizations rose sharply, prompting Governor Inslee to modify prohibitions on activities to stem the spread of the virus.<sup>4</sup> Proclamation 20-25.8 rolled back reopening of our state, imposing modifications to existing prohibitions.<sup>5</sup>

5. As the state takes measures to protect people from the spread of coronavirus, maintaining access to essential utility services throughout the state is critical, regardless of a household’s ability to pay. This access to utility services is not only important for the individual households, but also for public health and safety. Protections from disconnection have been essential in stabilizing those who have lost steady incomes, but some of these protections are expiring just as

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<sup>4</sup> Wash. Exec. Order No. 20-25.8 (Nov. 15, 2020) (“Stay Safe – Stay Healthy” Rollback of County-by-County Phased Reopening Responding to a COVID-19 Outbreak Surge”), available at [https://www.governor.wa.gov/sites/default/files/proclamations/proc\\_20-25.8.pdf](https://www.governor.wa.gov/sites/default/files/proclamations/proc_20-25.8.pdf).

<sup>5</sup> *Id.*

many states are experiencing a rise in COVID-19 cases.<sup>6</sup> This result can be avoided in Washington by evaluating appropriate data prior to lifting the moratorium.

6. The Duke University study shows that “the CARES Act and eviction, water, and utility moratoria significantly reduced daily infection growth rates as compared to a simulation of growth rate if no policies were implemented.”<sup>7</sup> With Washington placing the county-by-county phased reopening on hold to address the recent surge in coronavirus cases, the Commission will need to rely on information from other state agencies and public health information to make the best decision possible about when to lift the moratorium.
7. In other words, it may no longer be as easy as requiring all counties in a utility’s service territory to achieve a certain phase of the phased-reopening for a specified amount of time prior to resuming regular disconnection practices. Rather, as the Commission’s Order 01 recognizes, it will need to review a variety of metrics in order to comprehensively evaluate the health and economic condition of the state and the utilities’ service territories. Under this framework, no single indicator can provide all of the information the Commission needs to determine whether conditions have improved enough to relax the moratorium.
8. The Advocates recognize that the Commission is not a public health authority, but rather an economic regulator. Other state agencies are evaluating the pandemic and whether the state has recovered according to various health and economic metrics, including the Department of

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<sup>6</sup> Kay Jowers, Christopher Timmins, and Nrupen Bhavsar. *Policy in the Pandemic: Housing Security Policies Reduce U.S. COVID-19 Infection Rates*, DUKE UNIVERSITY NICHOLAS INSTITUTE FOR ENVIRONMENTAL POLICY SOLUTIONS (June 29, 2020), available at <https://nicholasinstitute.duke.edu/articles/policy-pandemic-housing-security-policies-reduce-us-covid-19-infection-rates>.

<sup>7</sup> Kay Jowers, Christopher Timmins, and Nrupen Bhavsar. *Policy in the Pandemic: Housing Security Policies Reduce U.S. COVID-19 Infection Rates*, DUKE UNIVERSITY NICHOLAS INSTITUTE FOR ENVIRONMENTAL POLICY SOLUTIONS (June 29, 2020), available at <https://nicholasinstitute.duke.edu/articles/policy-pandemic-housing-security-policies-reduce-us-covid-19-infection-rates>.

Health, the Department of Social and Health Services (DSHS), the Department of Commerce, and the Governor's Office. The Commission should coordinate with and leverage the expertise in those state agencies in evaluating whether conditions have improved such that lifting the moratorium would be appropriate.

9. With these considerations in mind, the Advocates recommend that the Commission consider the following metrics and data. These metrics, where possible, should be evaluated at the county level. The Advocates look forward to continued discussion with stakeholders, and this should not be considered an exhaustive list of metrics for the Commission to examine.

- **Economic Indicators:**

- Department of Social and Health Services - Equitable Recovery Technical Advisory Group that is developing an index to measure equitable economic recovery from the pandemic.
- Department of Commerce Economic Recovery Dashboard.
- Whether government restrictions that limit the availability of employment (e.g., impact on restaurants, hospitality, and retail businesses) have been lifted.

- **Public Health Indicators:**

- State Department of Health Dashboard Metrics, including:
  - A COVID-19 effective reproduction number of less than one;
  - Rate per 100,000 of newly diagnosed cases over two weeks is less than 25;
  - Percent of positives tests over a week is less than two percent;
  - Percent of adult staffed acute care beds occupied by patients is less than 80 percent; and
  - Percent of all staffed acute care beds occupied by COVID-19 patients is less than 10 percent.

- **Utility Customer Indicators:**

- Participation in utility bill assistance programs
- Level of utility past due balances (arrearages) (for example: have arrearages been reduced to within range of pre-COVID-19 levels?).

- Percent of customers with past due balances who have been notified of available assistance that are participating in arrearage management, bill assistance, or long term payment plans.
- **Actions of other Government Agencies:**
  - Have government restrictions on daily activities been lifted (e.g., Proclamation 20-25.8)?
  - Whether analysis from public health agencies demonstrates that the virus is contained or that trends are showing significant improvement for a sustained time period.
  - Whether recommendations from other state agencies indicate sufficient economic recovery.

**III. THE ADVOCATE’S PROPOSAL STRIKES A REASONABLE BALANCE TO PROVIDE ADEQUATE INFORMATION TO THE COMMISSION**

10. The Commission must rely on the best available data at the time any decision is made, and the Commission should retain authority to make future modifications as the situation warrants. The dual focus on health and economic conditions recognizes that the crises faced by customers are multifaceted and interrelated. No one can predict precisely when the threat of the pandemic will subside, but economic recovery will undoubtedly lag behind economic reopening.

11. The goal is to keep protections in place until they are no longer needed because prematurely lifting the moratorium will harm customers and decrease public safety. Customers who are unable to pay their utility bills now, as a result of the pandemic and associated economic crisis, will not likely be any better positioned to pay their bills without sufficient economic recovery. Indeed, without sufficient improvement in both the health data and economic circumstances, customers may still be unable to fully pay their utility bills and accrued arrearages. By relying on sufficient health and economic data to guide when the disconnection moratorium should be lifted, the Commission will provide customers an opportunity to recover the ability to pay their bills before facing the threat of disconnection.



12. The following sections discuss the information the Advocates recommend that the Commission consider to assess health and economic conditions and guide its decisions regarding continuing, modifying, or eliminating the disconnection and fee moratorium.

**A. Economic Data Should Provide a Clear Picture on Economic Recovery and Take Into Consideration Impact on Vulnerable Communities**

13. The Advocates identify three economic metrics and data the Commission should assess in determining whether to lift the moratorium. The first metric is an index being developed by the Department of Social and Health Services' Equitable Recovery Technical Advisory Group. The index will measure equitable economic recovery from the pandemic.<sup>8</sup> This index will allow the Commission to examine disaggregated unemployment numbers by industry, race, and income to provide a clearer picture of recovery for those populations who have borne the brunt of the pandemic.

14. The second metric the Advocates recommend that the Commission use is the Economic Recovery Dashboard developed by the Department of Commerce to assess economic recovery from the pandemic. The dashboard includes information about employment, retail sales, taxable business income, exports, support programs, and consumer behaviors including credit card spending and time spent outside of the home. This information will inform the Commission about whether overall employment has stabilized, whether businesses are operating at levels similar to pre-pandemic levels, whether people are experiencing food insecurity and seeking assistance, and whether consumer spending is returning to normal.

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<sup>8</sup> The Equitable Recovery Technical Advisory Group is an outgrowth of the Governor's Poverty Workgroup. This group expects to provide metrics in mid-December 2020. More information is available from Lori Pfingst from DSHS, who is leading this workgroup.

15. The third metric the Advocates suggest the Commission use is whether government restrictions that limit employment opportunities have been lifted. Many of the public policies that have been implemented during the pandemic impact the ability of various industries to operate. Examples include the leisure and hospitality industry (which has seen a decline in employment of 25 percent since the beginning of the pandemic), restaurants, and smaller retailers.<sup>9</sup> This information will inform the Commission about whether available jobs remain limited. This metric is related to a recommendation below on whether governmental bodies are taking actions that indicate that the pandemic is subsiding.

16. The Advocates do not recommend statewide unemployment numbers as an economic metric for the Commission to consider. While unemployment numbers provide some information, they are inadequate because they do not capture workers who want to work but are not actively looking. According to the Economic Policy Institute, “A large share of workers who lose their jobs in the coming weeks and months will very likely not be counted in the official unemployment rate because they won’t be actively looking for work.”<sup>10</sup> Indeed, because the nature of the pandemic has caused certain businesses to shut down or operate at dramatically reduced capacities, “many laid-off workers will make the rational decision not to search for work until they get the all-clear from public health authorities.”<sup>11</sup>

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<sup>9</sup> Wash. State Dep’t of Com. *Economic Recovery Dashboard*, available at <https://www.commerce.wa.gov/datadashboard/>.

<sup>10</sup> Elise Gould. *The unemployment rate is not the right measure to make economic policy decisions around the coronavirus-driven recession*, ECONOMIC POLICY INSTITUTE. (Mar. 20, 2020), available at <https://www.epi.org/blog/the-unemployment-rate-is-not-the-right-measure-to-make-economic-policy-decisions-around-the-coronavirus-driven-recession/>.

<sup>11</sup>*Id.*

17. Additionally, the pandemic disparately impacts different industries, decimating many low-wage industries, which employ high proportions of people of color. For example, Washington’s leisure and hospitality sector lost 87,000 jobs since January.<sup>12</sup> In contrast, many high-wage industries, such as professional and business services, finance, insurance, and real estate, have seen smaller job losses, remained stable, or even grown during the pandemic.<sup>13</sup> In other words, the pandemic’s variable impacts across different industries disproportionately harms workers in certain racial and class groups. Because these disparate impacts are not captured by aggregate unemployment numbers, the unemployment rate is an inadequate measure of economic recovery from the pandemic. In a 2013 article, The Brookings Institute has found similar limitations to unemployment measures for part-time workers and discouraged workers noting, “[t]he standard unemployment measure certainly misses some kinds of labor market hardship.”<sup>14</sup>

**B. Public Health Data Should Reflect Confidence That the Coronavirus Is Not Rapidly Spreading Through Our Communities**

18. The Advocates recommend that the Commission review state and county public health data in determining whether to lift the moratorium. There is no single public health metric that indicates whether the pandemic is subsiding. Rather, the Washington Department of Health and many county health districts are evaluating a series of metrics to assess infection prevalence,

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<sup>12</sup> Wash. State Dep’t of Com, *Economic Recovery Dashboard, Washington Employment by Industry*, <https://www.commerce.wa.gov/datadashboard/>

<sup>13</sup> Wash. State Dep’t of Com, *Economic Recovery Dashboard*, available at <https://www.commerce.wa.gov/datadashboard/>.

<sup>14</sup> Gary Burtless, *Does the unemployment rate mask today’s job market hardship?* BROOKINGS INSTITUTE (July 2, 2013), available at <https://www.brookings.edu/blog/up-front/2013/07/02/does-the-unemployment-rate-mask-todays-job-market-hardship/>.

testing availability, and health system readiness, and these data together inform government response. The Advocates recommend that the Commission review the State Department of Health’s COVID-19 in Washington State Dashboard and how Washington is meeting key metrics identified by the Department, including whether:

- The rate per 100,000 of newly diagnosed cases over two weeks is less than 25;
- The percent of positives tests over a week is less than two percent;
- The percent of adult staffed acute care beds occupied by patients is less than 80 percent; and
- The percent of all staffed acute care beds occupied by COVID-19 patients is less than ten percent.<sup>15</sup>

19. In addition, the Department of Health and infectious disease experts have identified the “effective reproductive number” as a tool to determine whether an infectious outbreak is growing, remaining stable, or shrinking.<sup>16</sup> The effective reproductive number identifies how many other people will become infected on average from each person infected with COVID-19.<sup>17</sup> When the effective reproductive number is greater than one, each infected person spreads the infection to more than one other person, and the outbreak grows larger. The faster the outbreak is growing, the larger the effective reproductive number is.<sup>18</sup> If the effective reproductive number is less than one, the outbreak will shrink because each infected person infects less than one other person.<sup>19</sup>

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<sup>15</sup> Washington State Coronavirus Response, *COVID-19 Risk Assessment Dashboard*, available at <https://coronavirus.wa.gov/what-you-need-know/covid-19-risk-assessment-dashboard>. Refer to Phase and Risk Assessment.

<sup>16</sup> Washington State Coronavirus Response. *COVID-19 Risk Assessment Dashboard*, available at <https://coronavirus.wa.gov/what-you-need-know/covid-19-risk-assessment-dashboard>. Refer to COVID-19 Disease Activity, Effective reproductive number (R).

<sup>17</sup> Interview by Seattle and King County Public Health Insider with Health Officer for Public Health Dr. Jeff Duchin, *Public Health Publishes New COVID-19 Key Indicators Dashboard*, (May 27, 2020), available at <https://publichealthinsider.com/2020/05/27/public-health-publishes-new-covid-19-key-indicators-dashboard/> (“Is the outbreak growing, shrinking or staying stable?”).

<sup>18</sup> *Id.*

<sup>19</sup> *Id.*

**C. Utility Program Data Should Reflect That Customers Are Receiving Access to Bill Assistance and Other Programing That Will Reduce Risk of Disconnection**

20. One goal of this docket was to establish important consumer protections and programs to minimize the risk of disconnection. Thus, the Advocates recommend that the Commission evaluate whether each utility is utilizing its customer assistance programs, including bill assistance, long term payment plans, or arrearage management programs. The Commission should evaluate whether the programs are serving at least 75 percent of the utility's customers who have past-due balances of 90 days or more. Additionally, the Commission should evaluate whether the number of customers with past due balances of 60 days has decreased to pre-coronavirus levels.

**D. Other Governmental Bodies Are Taking Actions That Indicate That the Pandemic Is Subsiding**

21. The Commission is one of many governmental agencies assessing the pandemic and actions that should be taken to protect Washingtonians. The Advocates recommend that, in deciding whether disconnection practices can return to pre-pandemic practices, the Commission should assess the actions of other government bodies. For example, the Commission should consider whether state and local government restrictions on daily activities has been lifted. Currently, Washington residents are limited in the types of interactions they may have with members outside of their household and businesses are limited in the services they can provide and the number of people they can serve. These restrictions will be lifted as the public health data supports resuming normal activities. As previously indicated in the Duke study, utility disconnection moratoria helped slow the spread of the coronavirus. For this reason, the

Commission should also regularly communicate and coordinate with local governments to ensure that responses are working together.

22. Additionally, the Commission should coordinate with the other government agencies and lean on their expertise in evaluating public health data. Moreover, these entities will likely want to know if the disconnection moratorium will be lifted given the likely impact on the transmission of the virus. In addition to the Department of Health, Department of Social and Health Services, Department of Commerce, and the Governor's Office, the Commission would likely benefit from contacting county officials for county-level information, such as health system readiness and social service impacts.

23. The Commission's actions are not made in a vacuum of data, nor are other agencies' decisions. Coordinating with and leveraging the expertise of other agencies will help the Commission make the best decision for whether and when to relax the moratorium, but will also provide some assurance to the public that state governmental agencies are not acting in ways that could undermine one another.

#### **IV. THE COMMISSION SHOULD RELY ON DATA THAT POSSESS RELIABLE CHARACTERISTICS**

24. The data the Commission relies upon to determine whether and when to lift the moratorium should provide sufficient assurances that the virus has been contained and that economic recovery is strong enough to be sustained.

**A. The Metrics Used by the Commission Should Take Into Account the Actual Impact of the Pandemic**

25. In considering what data to evaluate to assess the health and economic status of the pandemic, the Commission should rely on data that are inclusive of and will not have an adverse impact on vulnerable communities. Research released by the Pew Research Center in September 2020 showed that people of color and people with lower incomes are experiencing higher rates of financial distress as a result of this pandemic than white people or people with middle and upper incomes. Along economic class lines, 46 percent of people with lower incomes are having trouble paying their bills. Along racial lines, 43 percent of Black respondents and 37 percent of Hispanic respondents have had trouble paying their bills since February, compared to 18 percent of white respondents. In particular, Black and Hispanic respondents were struggling to pay for rent or mortgage, as well as medical care, at approximately double the rate of white respondents.<sup>20</sup>

26. Job recovery has also been unequal. According to the Pew Research Center survey, one in two adults who say they were laid off because of the pandemic remain unemployed and workers with higher incomes have recovered their jobs at higher rates than workers with low incomes. Forty-two percent of middle- and upper-income workers have returned to their previous jobs whereas only 26 percent of workers with lower incomes have returned to their jobs.<sup>21</sup> On top of this, we can anticipate that job gains in Washington State since February may once again

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<sup>20</sup> Kim Parker, Rachel Minkin, and Jesse Bennett, *Economic Fallout from COVID-19 Continues to Hit Lower-Income Americans the Hardest*, PEW RESEARCH CENTER (Sept. 24, 2020), available at <https://www.pewsocialtrends.org/2020/09/24/economic-fallout-from-covid-19-continues-to-hit-lower-income-americans-the-hardest/>.

<sup>21</sup> *Id.*

recede, particularly in the hospitality and leisure industry, because of the recent restrictions imposed by Governor Inslee on through Proclamation 20-25.8 to contain the pandemic.

27. Black communities are being particularly devastated by the pandemic. According to research by the Economic Policy Institute, “African Americans have disproportionately high COVID-19 death rates and are more likely to live in areas experiencing outbreaks.”<sup>22</sup> Locally, we see these unequal rates of infection play out in at least King County, with Black and Hispanic populations seeing disproportionately higher rates of COVID-19 infection relative to their representation in the population.<sup>23</sup>

28. Moreover, Black Americans entered the COVID-19 recession never having recovered from the Great Recession. According to data published by the Brookings Institute, the unemployment rate for Black Americans in 2019—pre-pandemic—was significantly higher than that during the Great Recession.<sup>24</sup> This economic factor is one of the many underlying factors that have exacerbated the economic recession for Black Americans, who have “historically suffered from higher unemployment rates, lower wages, lower incomes, and much less savings to fall back on, as well as significantly higher poverty rates than their white counterparts. This prior insecurity has magnified the current economic damage to these workers and their families.”<sup>25</sup>

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<sup>22</sup> Elise Gould & Valerie Wilson, *Black workers face two of the most lethal preexisting conditions for coronavirus—racism and economic inequality*, ECONOMIC POLICY INSTITUTE (June 1, 2020), available at <https://www.epi.org/publication/black-workers-covid/>.

<sup>23</sup> King County Public Health, *Race and Ethnicity Dashboard*, available at <https://www.kingcounty.gov/depts/health/covid-19/data/race-ethnicity.aspx>.

<sup>24</sup> Andre M. Perry, *Black workers are being left behind by full employment*, BROOKINGS INSTITUTE (June 26, 2019), available at <https://www.brookings.edu/blog/the-avenue/2019/06/26/black-workers-are-being-left-behind-by-full-employment/>.

<sup>25</sup> Elise Gould & Valerie Wilson, *Black workers face two of the most lethal preexisting conditions for coronavirus—racism and economic inequality*, ECONOMIC POLICY INSTITUTE (June 1, 2020), available at <https://www.epi.org/publication/black-workers-covid/>.



**B. The Commission Should Choose Metrics That Possess a Reasonable Degree of Certainty**

29. As noted above, the moratorium should remain in place until it is no longer needed. The concern is that premature lifting of the moratorium will harm customers and decrease public safety. Thus, the Commission should rely on metrics that are less volatile, or that have been sustained for a sufficient period of time, to ensure that conditions are indicative of sustained, rather than merely temporary, improvement. For example, some metrics are measured as rolling averages to capture longer-term effects. Even so, all metrics represent a snapshot in time. The Commission should consider whether the metrics it chooses need to be established over a period of time, along with what time period will provide the best assurances of economic recovery and virus containment.

**C. Certain Metrics Suggested in the Attachment to Order 01 Should Not Be Used**

30. *Gross Domestic Product.* The Advocates recommend that the Commission not use gross domestic product (GDP) as a measure of economic recovery from the pandemic, as it does not capture the distribution of growth, which has been unequal over the past 40 years. According to analysis published by Demos in 2013:

Since 1979, the bottom 20 percent of earners saw their income increase by 18 percent. Over the same time period, the top twenty percent of earners saw their incomes increase by 65 percent and the top one percent saw their incomes increase by an astonishing 277 percent. The U.S. GDP, meanwhile, more than doubled over the last 30 years with no ability to reflect the growing income inequality [...] as GDP has increased, so has the level of inequality.<sup>26</sup>

The Washington Center for Equitable Growth found similar limitations to GDP, stating:

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<sup>26</sup> J. Mijin Cha, *What's Missing from GDP?* DEMOS (Jan. 29, 2013), available at <https://www.demos.org/research/whats-missing-gdp>.

These trends [income inequality] are invisible when we look at the most basic metrics we use to measure economic success. One of those measures — indeed perhaps the most important is gross domestic product, which is the sum total of all the goods and services produced within a nation’s borders. While not built to measure wellbeing — it’s an aggregate measure of income, not people’s welfare — it’s policymakers’ shorthand for the state of the nation’s economy. Even as who gains from growth has become increasingly unequal.<sup>27</sup>

31. *In-Person Learning*. The attachment to Order 01 references status of in-person learning as a potential metric to refer to when determining whether to relax the moratorium. The decision of whether to bring children into an in-person environment will also be a complicated decision and one with gradients (e.g., youngest children prioritized for in-person learning while older children remain remote, timing relative to the end of the school year). While the Commission will have this information available, other information that is more directly tied to economic and public health indicators will be more informative.

## V. CONCLUSION

32. The Advocates appreciate the opportunity to provide these comments. The Commission will need adequate information about the state of the pandemic before it can determine whether to lift, modify, or continue the disconnection and fee moratorium. The metrics and data proposed by the Advocates are designed to provide the Commission with a well-rounded, comprehensive look at whether the health crisis is abating and whether economic recovery is occurring. We look forward to reviewing the suggestions of other stakeholders and participating in the Commission’s

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<sup>27</sup> Heather Boushey, Washington Center for Equitable Growth, *The economy isn’t getting better for most Americans. But there is a fix*, THE GUARDIAN (May 1, 2019), available at <https://www.theguardian.com/commentisfree/2019/may/01/broken-capitalism-economy-americans-fix>.

Open Meeting in February 2021. If you have questions regarding these comments, please contact any of the undersigned.

Dated this 1st of December, 2020.

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