

From: [White, Kendra \(UTC\)](#)
To: [UTC DL Records Center](#)
Cc: [Andrews, Amy \(UTC\)](#)
Subject: FW: Follow-up Comments on Energy Assistance Definitions
Date: Wednesday, February 19, 2020 1:37:23 PM

Hello,

Could someone please post the following comments to Dockets UE-190652 and UE-190698?

Thanks,

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Kendra White
Energy Policy Advisor | 360-701-5363
Utilities and Transportation Commission

From: Deric Gruen <deric@frontandcentered.org>
Sent: Wednesday, February 12, 2020 1:20 PM
To: White, Kendra (UTC) <kendra.white@utc.wa.gov>; Vorpahl, Sarah (COM) <sarah.vorpahl@commerce.wa.gov>
Cc: Mariel Thuraisingham <mariel.thuraisingham@gmail.com>; Yolanda Matthews <yolanda@pugetsoundsage.org>; Katrina Peterson <katrina@pugetsoundsage.org>
Subject: Follow-up Comments on Energy Assistance Definitions

Dear Sarah and Kendra,

We wanted to follow-up with some written input on the questions raised for the January 28th CETA Energy Assistance workshop, doing our best to not reiterate earlier written comments.

We recommend that compliant energy assistance programs must serve all low income households, and that the assistance be scaled to prioritize, in time and resources, the lowest income households populated by the most vulnerable demographics.

Every type of assistance must be accessible to every type of low income highly burdened household. What we mean is that every qualifying household should have access to every class of energy assistance program (bill assistance, weatherization, and participation in any energy efficiency or demand response program), but not necessarily every program within those classes. Programs may need to be targeted to specific geographies and populations to maximize participation based on language, location, community affiliation etc. Utilities should show how issues of access are addressed, paying attention to different subsets of the low income population that are particularly vulnerable and communicating with them appropriately and effectively. When Puget Sound Sage surveyed a representative sample of communities of color in the Seattle area, the results suggested that many qualifying households do not know about assistance or do not think they are eligible. Responses suggested that over 40% of households below \$30k had not heard about the energy assistance programs, and 24% of households below \$10k, and 62% of households between \$10k and \$30k were likely eligible for assistance, but do not use it. Lack of effective outreach may account for under enrollment.

The definition of energy burden should not consider public or private assistance towards income where that assistance, such as certain housing vouchers and subsidies, is restricted to uses that cannot include energy payments. The Puget Sound Sage research survey included questions about what households do when faced with higher energy costs. Over one-third of respondents cited cutting out necessities like rent and mortgage payments, childcare and eldercare, food and medicines - and more than one in ten stating that they might feel obligated to move to find a less expensive housing situation. Energy assistance programs should be designed so that highly burdened low income households should not risk displacement or having to scale back spending on necessities due to non-eligibility.

We favor agency guidance on all forms of energy assistance that lead to long term burden relief - in the form of weatherization, conservation, and energy efficiency – and direct ownership and distributed energy. The rules should provide that shutoff data be tracked and reported, data be aggregated by the agencies, and that a critical goal towards progress on the energy assistance mandate be a reduction of shutoffs and reporting on shutoff.

There remains confusion over what the reduction of energy assistance need must look like. We strongly recommend that agencies further define energy assistance need around the requirement that energy assistance need be reduced by 90% by 2050 and the interim target. Specifically in relation to that goal, energy assistance need means that utilities are reaching 90% of eligible households' gap between their energy burden and the energy assistance figure of 6% or lower.

Finally, we further suggest that agencies clearly guide utilities to establish processes for offering inclusive, engaging opportunities for low income communities to contribute to energy assistance program design.

Sincerely,

Deric Gruen & Mariel Thuraisingham
Front and Centered

Yolanda Matthews & Katrina Peterson
Puget Sound Sage