



# STATE OF CONNECTICUT

PUBLIC UTILITIES REGULATORY AUTHORITY  
TEN FRANKLIN SQUARE  
NEW BRITAIN, CT 06051

DOCKET NO. 17-12-03RE01 PURA INVESTIGATION INTO DISTRIBUTION  
SYSTEM PLANNING OF THE ELECTRIC  
DISTRIBUTION COMPANIES - ENERGY  
AFFORDABILITY

December 18, 2019

By the following Commissioners:

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**INTERIM DECISION**

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## INTERIM DECISION

### I. INTRODUCTION

On November 1, 2019, the Public Utilities Regulatory Authority (PURA or Authority) held a Public Forum technical meeting (November 1<sup>st</sup> Public Forum) to discuss energy affordability for the residential customer class in Connecticut.<sup>1</sup> Specifically, the Public Forum was held to discuss: (1) the current work being done in the State regarding residential energy affordability; (2) the most impactful barriers to increased residential energy affordability and equity in the State; and (3) potential “no regrets” solutions to those barriers.

Stakeholders at the Public Forum highlighted both the importance of addressing residential energy affordability and equity in Connecticut and the opportunity for stakeholders to address some of the most impactful barriers immediately. Ms. Leticia Colon de Mejias, of Efficiency For All, testified to her personal experience in serving Connecticut communities:

[The energy affordability] gap has continued to grow in [environmental justice communities and limited income communities] often leaving them with no power and no heat resulting in unacceptable levels of eviction which further burden families with children or disabilities. These social impacts are a burden to our state support system and our overall budget...In serving this population, I see their struggles regularly identifying families who choose between paying for heat, food, or medical treatment.

Tr. 11/1/19, pp. 83-84.

Ms. Bonnie Roswig from the Center for Children’s Advocacy also testified to the importance of addressing energy affordability, stating “...when we think and hear about energy affordability, we are hearing about human suffering.” *Id.*, p. 52. Ms. Roswig also offered that not all solutions to addressing energy affordability and equity in Connecticut need to be complex or take multiple years: “I think so many of the issues that impact the very poor community are issues that can be resolved now, today, by making sure that enforcement of existing programs go forward.” *Id.*, p. 52.

Based on this and other stakeholder testimony from the November 1<sup>st</sup> Public Forum and written comments received in this proceeding in response to the Authority’s October 10, 2019 and November 12, 2019 Notices of Request for Written Comments, the Authority finds that it is just and prudent to immediately start the implementation of practical measures outlined in this Interim Decision to improve existing energy affordability programs, particularly as the heating season begins.

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<sup>1</sup> The November 1<sup>st</sup> Public Forum was broadcast by the Connecticut Network (CTN). See, <http://www.ctn.state.ct.us/ctnplayer.asp?odID=16845>.

## **A. SUMMARY**

In this Interim Decision, the Authority directs the electric distribution companies (EDCs) to implement a series of practical solutions to help identify and engage with residential customers that may qualify for hardship status, or are otherwise customers of limited means. Specifically, the Authority directs The Connecticut Light and Power Company d/b/a Eversource Energy (Eversource) and The United Illuminating Company (UI; collectively, the EDCs, or “the Companies”) to take three immediate actions to assist residential customers in paying their energy bills this winter season, as outlined herein. This Interim Decision builds on the Orders in the Authority’s Decision dated September 25, 2019, in Docket No. 19-07-02, Application of The Connecticut Light and Power Company and Yankee Gas Services Company, each individually d/b/a Eversource Energy, The United Illuminating Company, Connecticut Natural Gas Corporation, and The Southern Connecticut Gas Company for Approval of Arrearage Forgiveness Program 2019-2020. Additionally, the Authority invites Operation Fuel to engage in a dialogue on program reporting mechanisms and associated metrics.

The actions outlined in this Interim Decision to expand the utilization of existing utility arrearage forgiveness and other energy assistance programs to eligible households represents a first step in a comprehensive approach to improve energy affordability and equity in the State. The Authority will continue to hold future Public Forums and/or Solutions Days technical meetings to discuss other barriers and potential solutions to energy affordability for the residential customer class, as well as on energy affordability for commercial and industrial customer classes. The Authority will also continue to pursue opportunities for data sharing between the Companies and the Connecticut Department of Social Services (DSS), and the cross-promotion of programs with DSS and the Community Action Agencies (CAAs), among other organizations. The Authority will issue a Final Decision that addresses these matters and outlines additional solutions discussed in the proceeding.

## **B. BACKGROUND OF THE PROCEEDING**

In the Interim Decision dated October 2, 2019, in Docket No. 17-12-03, PURA Investigation into Distribution System Planning of the Electric Distribution Companies (Equitable Modern Grid Interim Decision), the Authority specified a series of reopened proceedings to further investigate a number of near-term topics integral to realizing the objectives outlined in its Framework for an Equitable Modern Grid. Equitable Modern Grid Interim Decision, pp. 24 and 25. In accordance with the Equitable Modern Grid Interim Decision, the Authority initiated the above-captioned proceeding on October 4, 2019, to investigate the topic of energy affordability for all customer classes in Connecticut. The Authority’s investigation seeks to: (1) identify the most impactful barriers to increased energy affordability and equity in the state; and (2) potential solutions to those barriers.

## **C. CONDUCT OF THE PROCEEDING**

By Notice of Proceeding dated October 8, 2019, the Authority announced that it would conduct this uncontested reopened proceeding pursuant to §§ 16-11 and 16-244i of the General Statutes of Connecticut (Conn. Gen. Stat.).

By Notice of Public Forum and Request for Presentations and Comments dated October 10, 2019, the Authority announced that the November 1<sup>st</sup> Public Forum would be held at the offices of the Authority, 10 Franklin Square, New Britain, Connecticut. The November 1<sup>st</sup> Public Forum began with presentations from interested stakeholders on the current dialogue and work being done in the state regarding residential energy affordability, during which the following individuals and organizations presented:

- Department of Energy and Environmental Protection (DEEP)
- Office of Consumer Counsel (OCC)
- Connecticut Green Bank (CGB)
- Center for Children
- E4TheFuture
- Efficiency For All
- UI
- Eversource
- Operation Fuel

The Public Forum concluded with a roundtable discussion on (1) the most impactful barriers to increased residential energy affordability and equity in the State and (2) “no regrets” solutions to the most impactful barriers within PURA’s statutory authority, during which the following organizations presented:

- Connecticut Legal Services, Inc.
- Clean, Healthy, Energy Efficient, Renewable initiative
- People’s Action for Clean Energy

#### **D. PARTIES AND INTERVENORS OR PARTICIPANTS**

The Authority recognized the following as Participants to the proceeding: OCC, Ten Franklin Square, New Britain, CT 06051; the Commissioner of DEEP, 79 Elm Street, Hartford, CT 06106; Eversource, P.O. Box 270, Hartford, CT 06141; UI, 180 Marsh Hill Road, MS AD-2A, Orange, CT 06477; Office of the Attorney General (AG), 10 Franklin Square, New Britain, CT 06051; DSS, 55 Farmington Avenue, Hartford, CT 06106; CGB, 845 Brook Street, Rocky Hill, CT 06067; Connecticut Industrial Energy Consumers, Couch White, LLP, 540 Broadway, P.O. Box 22222, Albany, New York 12201; Acadia Center, 31 Milk Street, Suite 501, Boston, MA 02109; Connecticut Fund for the Environment/Save the Sound, 900 Chapel Street, Suite 2202, New Haven, CT 06511; Operation Fuel, 75 Charter Oak Avenue, Suite 2-240, Hartford, CT 06106; Center for Children's Advocacy, 65 Elizabeth Street, Hartford, CT 06105; Connecticut Legal Services, Inc., 1125 Main Street, Willimantic, CT 06226.

## **II. AUTHORITY ANALYSIS**

In 2016 and 2017, more than 300,000 residents spent more, sometimes *substantially* more, than six percent of their household income on energy bills, the commonly accepted metric for determining energy affordability. In 2017, the portion of

energy expenditures above six percent of household income in Connecticut was more than \$400 million.<sup>2</sup>

Docket Participants and stakeholders who attended the November 1<sup>st</sup> Public Forum confirmed that identifying eligible customers to participate in existing utility arrearage forgiveness and other energy assistance programs is a key barrier to achieving increased energy affordability and equity in Connecticut. Using data from the American Community Survey, a 2016 report commissioned by Operation Fuel estimated more than 436,000 households in Connecticut – nearly one-third of Connecticut households – are income-eligible for low-income energy programs in Connecticut.<sup>3</sup> As of 2015, the State-administered Connecticut Energy Assistance Program (CEAP) provided financial assistance to approximately 22% of the more than 436,000 households eligible for the program, and covered approximately 16% of the household's average annual energy bill. Tr. 11/1/19, p. 174. As it pertains to CEAP eligibility, low-income is defined as a household income at or below 60% of the state median income.<sup>4</sup> Other energy assistance programs in Connecticut define low-income at different levels, such as Operation Fuel's standard of up to 75% of state median income. *Id.*, p. 128.

The Companies are guided by a statutory definition of hardship used to identify customers who lack financial resources to pay their utility bills in full. Conn. Gen. Stat. § 16-262c(b)(3)(B) defines a hardship case as including, but not limited to:

- (i) A customer receiving local, state or federal public assistance; (ii) a customer whose sole source of financial support is Social Security, United States Department of Veterans Affairs or unemployment compensation benefits; (iii) a customer who is head of the household and is unemployed, and the household income is less than three hundred per cent of the poverty level determined by the federal government; (iv) a customer who is seriously ill or who has a household member who is seriously ill; (v) a customer whose income falls below one hundred twenty-five per cent of the poverty level determined by the federal government; and (vi) a customer whose circumstances threaten a deprivation of food and the necessities of life for himself or dependent children if payment of a delinquent bill is required.

Residential customers who meet one or more of the above criteria are coded for hardship status in the EDCs' billing systems, and are eligible for utility hardship programs, such as arrearage forgiveness and shutoff protection during the winter months (Winter Protection Plan).

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<sup>2</sup> See Home Energy Affordability in Connecticut: The Affordability Gap (2017), prepared for Operation Fuel by Fisher, Sheehan & Colton Public Finance and General Economics, dated October 2017 (<http://www.operationfuel.org/wp-content/uploads/2017/12/2017-ConnecticutHEAG-11-27-17-RDC-edits.pdf>).

<sup>3</sup> Meeting the Needs of Low-Income Households in Connecticut: Final Report, prepared for Operation Fuel by the Applied Public Policy Research Institute for Study and Evaluation, dated December 2016 (<http://www.operationfuel.org/wp-content/uploads/2017/03/CT-Operation-Fuel-Study-FINAL-Report-12-31-16.pdf>).

<sup>4</sup> This equates to a maximum annual income for a two-person household is \$45,920 and \$67,530 for a four-person household.

UI stated that it has 19,000 residential hardship customers coded in its billing system. Tr. 11/1/19, p. 96. However, UI estimated that about one-third of its residential customers would qualify as low-income under the CEAP eligibility guidelines of a household at or below 60% of the state median income. Id. Eversource indicated that there are currently 78,000 electric customers and 12,000 gas customers in its service territory who have demonstrated proof of hardship. Id., p. 123. Of those 90,000 Eversource customers coded as hardship, 75,000 customers are participating in an arrearage forgiveness program. Id., p. 118. Eversource also described its ongoing work with Experian, who estimated that approximately 120,000 single-family households in its service territory may be eligible for hardship status. Id., p. 121.

Although the exact number of residential customers who may qualify for hardship status or are otherwise low-income is currently unknown, the data presented suggests there is a significant population of eligible customers who have not been identified as such, and therefore are not currently participating in the existing utility arrearage forgiveness programs or the Winter Protection Plan. While docket Participants and other stakeholders who participated in the November 1<sup>st</sup> Public Forum expressed support for the CEAP and existing utility arrearage forgiveness programs, many also indicated that there are opportunities to improve efforts to identify and enroll qualifying income-eligible and hardship customers. E.g., Tr. 11/1/19, p. 57; 82; 100; 148-149.

Eversource indicated, in response to the discussion at the November 1<sup>st</sup> Public Forum, that the company has identified three additional opportunities or solutions to more effectively identify and enroll eligible customers to participate in existing utility arrearage forgiveness and other energy assistance programs. Eversource 12/4/19 Written Comments, p. 3. The first opportunity is to work with CAAs, DSS, and other health and human service organizations to access to the best available data to enable the Company to more effectively contact customers to enroll them into programs and services they may be eligible to receive. Id. A second opportunity or solution that Eversource identified is to work with CAAs, DSS, and other health and human services organizations to determine how best to integrate the application and qualification processes between these organizations and the Company. Id. Third, Eversource indicated it believes simplifying the energy efficiency application for low-income customers is another opportunity, and that it is in the process of developing a more simplified energy efficiency application as part of its annual application update. Id.

The Authority appreciates the open discussion of impactful barriers and potential solutions to improving energy affordability and equity in the State in the proceeding thus far. The Authority directs the EDCs to implement a series of practical solutions identified herein to help identify and engage with residential customers who may qualify for hardship status or are otherwise low-income. These initial efforts to expand the utilization of existing utility arrearage forgiveness and other energy assistance programs to eligible households represents a first step in a comprehensive approach to improve energy affordability and equity in the State.

## **A. EXPANDING EDCs' EDUCATION & OUTREACH EFFORTS TO IDENTIFY POTENTIAL HARDSHIP CUSTOMERS**

Despite the commendable and well-intentioned efforts of the EDCs, DSS, CAAs, and other community advocates to identify and provide support to customers eligible for utility arrearage forgiveness and other energy assistance programs, it is evident that not all residential customers who struggle financially to pay their energy bills are aware of the full range of payment options and energy assistance programs available to them. The Authority finds that residential customers – as well as all docket Participants and interested stakeholders – would benefit from further clarification of the Companies' bill payment options, policies, and procedures for hardship or otherwise low-income customers. In addition, the Authority finds there are opportunities for the EDCs to leverage existing education and outreach efforts to cross-promote utility hardship and energy efficiency programs to provide a comprehensive, solutions-based approach to improving energy affordability and equity in the State.

DEEP provided similar analysis in their response to the discussion at the November 1<sup>st</sup> Public Forum. DEEP stated that "...a common theme from the presentations is the lack of a coordinated and effective education program....The Authority can alleviate some of the problems faced by ratepayers by requiring the EDCs to develop and carry out a comprehensive, accessible education program." DEEP 12/9/19 Written Comments, p. 4.

Accordingly, the Authority directs the Companies to implement three immediate actions to assist residential customers in paying their energy bills this winter season, as outlined below.

### **1. Fact Sheet on Repayment Policies and Procedures**

The EDCs discussed various Company policies and procedures with respect to repayment plan options, service disconnection and reconnections, and utility vs. third party collection practices for past due balances at the November 1<sup>st</sup> Public Forum. Tr. 11/1/19, pp. 270-288. The Authority acknowledges that these Company policies and procedures are complex and may not be easily understandable to affected customers. Furthermore, community advocates and other stakeholders would likely benefit from having additional resources to reference that explain Company bill payment policies and procedures in greater detail to assist with education and outreach efforts.

The Authority directs the Companies to each develop a fact sheet – or a series of "one-page" fact sheets – that clearly, comprehensively, and concisely summarize relevant information to hardship and non-hardship customers with respect to the following Company programs, policies, and procedures:

1. Criteria for service disconnection/termination and reconnections, including, but not limited to, security deposit requirements for reconnection of service, if any;
2. Utility vs. third-party collection agency and skip tracing practices, including, but not limited to, the statute of limitations for collecting past due balances;
3. Late fee accruals on past due balances;

4. Ability for customers to negotiate repayment plan options for past due balances, including, but not limited to, the process of requesting the application of the Below Budget Worksheet for the Companies' Matching Payment Plans;
5. Explanation of the Winter Protection Program timing and participation requirements; and
6. Any other bill payment information relevant to potential hardship customers.

The Authority recognizes that many of the above topics are relevant to customers transitioning out of homelessness who are seeking to reestablish and reconnect their electric utility service. Consequently, the Authority encourages the Companies to tailor an additional fact sheet on Company programs, policies, and procedures for this particular population.

Furthermore, the Authority concurs with several docket Participants that the materials need to be readable and accessible by all communities, and thus directs the Companies to submit separate versions of the fact sheets in English and Spanish. Should there be a need to provide the information outlined in the fact sheets in any additional languages, the Authority directs any such requests to be discussed through the Low-Income Energy Advisory Board (LIEAB).

The Authority acknowledges that the EDCs provide information on bill payment options and other energy assistance programs on their respective Company websites, and that this information is presented in other formats at different times during the year (e.g., bill inserts, marketing campaigns, annual training for the CAAs, etc.). Notwithstanding, the Authority seeks to test an expanded approach to outreach and education efforts to further increase awareness of existing utility hardship and other energy assistance programs for this winter season. An expansion of the EDCs' existing outreach and education efforts also aims to promote transparency and ensure consistent application of the Companies' bill payment policies and procedures to all residential customers in Connecticut. At a minimum, the Authority will order the distribution of the aforementioned fact sheets to the CAAs upon approval by PURA.

## **2. Script for Customer Service Representatives on Repayment Policies and Procedures**

In order to participate in the utility arrearage forgiveness programs and the Winter Protection Plan, a residential customer needs to be identified as a hardship customer in the Companies' billing systems. However, it is clear from the November 1<sup>st</sup> Public Forum that many customers are not aware that (1) they may be eligible for hardship status; (2) there are payment programs and other resources available to hardship customers; and (3) the process and requirements for demonstrating proof of hardship. If hardship status serves as a "gateway" for the EDCs in identifying qualifying customers for utility hardship programs, it is critical for the Authority, docket Participants and other interested stakeholders to have an explicit understanding of the information and options being communicated by the Companies' customer service representatives to customers who may be eligible for hardship status.

The Authority finds further clarification of Company programs, policies, and procedures with respect to bill payment and other energy assistance programs, as outlined above in the fact sheet requirements, relayed by customer service representatives is needed to ensure a consistent message and a high quality of service is provided to all residential customers who contact their EDC. Eversource, for example, stated its customer service representatives are able to prequalify customers for the CEAP over the phone. Tr. 11/1/19, p. 120. Over the past two months, Eversource customer service representatives directed 1,300 customers to their local CAA to apply for the CEAP. Id. Additional information is needed to determine whether a similar approach is offered for UI's residential customers.

The Authority directs the Companies to separately file a sample script to be used by their customer service representatives that addresses questions from residential customers who contact their EDC to express concern about their ability to pay their electric bill. The script shall include, but not be limited to, explanations for Company programs, policies, and procedures that address all of the topics outlined in the fact sheet requirements, discussed above.

The Authority appreciates Senator Blumenthal's comments filed on December 16, 2019, recommending that PURA require the Companies to establish a process to test the fact sheet messaging on target constituents. Notwithstanding, the Authority also recognizes the urgent need for the Companies to finalize the fact sheets to utilize in education and outreach efforts aimed at assisting residential customers this winter season. Accordingly, the Authority intends to strike a balance by encouraging the Companies to share their draft fact sheets and sample customer service representative scripts with docket Participants to solicit feedback prior to the filing deadline with PURA, as outlined in Orders 3 and 4. Further, the Authority is also providing an opportunity for docket Participants and interested stakeholders to file written comments on the fact sheets and sample scripts filed by the Companies; such written comments should be filed no later than January 27, 2020.

Once the fact sheets and sample scripts for customer service representatives have been filed with the Authority, PURA encourages the Companies to continue to consult with docket Participants and interested stakeholders to continue to refine the materials based on feedback. The Authority concurs with Senator Blumenthal that focus groups can also be an effective tool to solicit feedback on messaging and encourages the Companies to consult LIEAB on opportunities to employ such feedback mechanisms moving forward.

Moreover, the Authority emphasizes that the fact sheets and call center scripts envisioned by this Decision are by no means intended to serve as an exhaustive list of materials needed to address this issue. In fact, the Authority received several additional suggestions for fact sheet topics and complementary campaigns in the Written Exceptions, including from the AG. The Authority encourages the Companies to proactively consider additional messaging that could be included in the fact sheets mandated by this Decision that would be complementary to the stated objectives contained herein, including but not limited to the suggestion from the AG regarding information about sophisticated scamming schemes from entities pretending to be the

EDC that hardship customers may encounter. AG Letter in Lieu of Written Exceptions dated 12/16/19, pp. 1-2.

### **3. Community outreach events in January – February 2020**

To complement the submission of fact sheets and customer service representative scripts, the Authority directs Eversource to hold at least six outreach and education events and UI to hold at least four outreach and education events for members of the public in communities in their service territory during January and February 2020. These outreach events shall take place in the evenings and shall be scheduled for a minimum of two hours per event. The Companies shall consult with OCC, the CAAs, DSS, and Operation Fuel to identify appropriate locations to host the events, and identify community stakeholders to partner with to co-sponsor events and/or to assist in raising awareness of scheduled events. The Companies are also encouraged to consult and invite local elected officials to plan, attend and assist with promoting the outreach events. Company representatives shall cover the following at each community outreach event:

1. An explanation of hardship status and the process and requirements for demonstrating proof of hardship;
2. An explanation of medical hardship and the process and requirements for demonstrating proof of medical hardship;
3. An explanation of the Winter Protection Program timing and participation requirements;
4. An overview of the CEAP, including the steps to participate as outlined in the Companies' Energy Assistance Road Map;
5. An overview of existing utility arrearage forgiveness programs;
6. The criteria for utility service disconnection/termination and reconnections, including, but not limited to security deposit requirements for reconnection of service, if any; and
7. An overview of the Home Energy Solutions (HES) program, the Home Energy Solutions – Income-Eligible (HES-IE) program, and other relevant residential energy saving measures offered through the Conservation & Load Management (C&LM) Plan.

The Authority will require the Companies to report on how the series of outreach events were advertised, including any partnerships established with community advocates. The Companies will also be directed to track the number of attendees per event to determine whether this outreach approach shall be continued or modified in the future.

### **B. REPORTING ON OPERATION FUEL ENERGY ASSISTANCE PROGRAM**

As a non-profit organization, Operational Fuel provides year-round energy assistance to Connecticut households in need through direct bill payments of up to \$1,000 per year. *Id.*, p. 127. Operation Fuel served over 7,000 households in 2018 and over 5,400 households in 2019. *Id.*, p. 137. However, the organization had to close intake sites before the end of each year due to insufficient funding. *Id.* Operation Fuel receives 72% of its revenue from ratepayers through the Systems Benefit Charge (SBC). *Id.*, p. 127. The utility-administered “Add-a-Dollar” charitable campaigns, along with support

from foundations, corporate donors, and individuals comprise the remainder of Operation Fuel's revenue. Id. Operation Fuel redirects nearly all of its funds toward direct bill payments. Id., p. 128.

Operation Fuel acknowledged that despite receiving the majority of its funding through the SBC, the organization is not statutorily required to report to PURA on program activities. Id., p. 134. However, Operation Fuel suggested that it should be required to demonstrate how ratepayer funds are spent to provide energy assistance to Connecticut households. Id.

The Authority agrees with Operation Fuel that a mechanism to report on Operation Fuel's program activities in dispersing funds from the SBC for energy assistance would provide further insight into the program's reach, and would be beneficial to all docket Participants and interested stakeholders in deepening our collective understanding of energy affordability and equity in the State. As a result, the Authority invites Operation Fuel to submit a proposed reporting mechanism, timeline, and associated metrics to PURA that summarize the impact of direct bill assistance provided through ratepayer contributions to the SBC.

The Authority looks forward to building off of future reporting metrics for Operation Fuel by applying similar program metrics to all other energy assistance programs supported by ratepayer contributions.

### **C. PURA RECOMMENDATIONS ON IMPROVEMENTS TO THE HES-IE PROGRAM**

At the November 1, 2019 Public Forum, multiple stakeholders commented that one of the most impactful barriers to achieving greater participation in the HES-IE program from eligible households is the completion of the HES-IE customer application, including the submission of the necessary income verification documentation. Id., pp. 79; 119; 150-152; 162; 219. In addition, some stakeholders seemed unaware that Eversource is currently waiving the income verification requirements for the HES-IE application for households in census tracts where 80% or more of the households are at or below 60% of the state median income. Id., pp. 212-220. The November 1, 2019 Public Forum highlighted the potential for confusion among homeowners and renters applying for the HES-IE about whether the income verification requirements of the HES-IE application would be waived. Eversource noted it had not previously considered making a separate HES-IE application that removes the income eligibility requirements, but stated the Company is open to exploring this possibility further. Id., p. 218.

On November 21, 2019, DEEP issued a Notice of Public Informational Meeting and Opportunity for Public Comment regarding the proposed 2020 Plan Update of the 2019-2021 Conservation and Load Management (C&LM) Plan. On December 9, 2019, the Authority submitted written comments to DEEP on the HES-IE program. Specifically, the Authority recommended to DEEP that at a minimum, Eversource be directed to modify its HES-IE application so that the application matches its targeted messaging efforts toward census tracts where 80% or more of the households are at or below 60% of the state median income. The Authority also recommended to DEEP that the EDCs adopt a set of community engagement principles, with guidance from DEEP and the Energy Efficiency Board, to further encourage coordination of marketing and outreach efforts

within the targeted communities, and to resolve barriers identified by stakeholders in the implementation of energy efficiency programs offered through the C&LM Plan. Lastly, the Authority noted in its comments that it supports the expanded use of census tract data by the EDCs to identify qualifying HES-IE households across the Company's service territory, thereby allowing the EDCs to waive the income verification requirements for the HES-IE application for many more potential HES-IE applicants.

The Authority looks forward to discussing improvements to the HES-IE program, as well as identifying potential solutions to the landlord/tenant split incentive and other current barriers in the context of DEEP's review of the C&LM Plan and through this PURA proceeding.

### **III. FINDINGS OF FACT**

1. In 2017, the portion of energy expenditures above six percent of household income in Connecticut was more than \$400 million.
2. A 2016 report commissioned by Operation Fuel estimated more than 436,000 households in Connecticut – nearly one-third of Connecticut households – are income-eligible for low-income energy programs in Connecticut.
3. As of 2015, the Connecticut Energy Assistance Program provided financial assistance to approximately 22% of the more than 436,000 households eligible for the program, and covered approximately 16% of the household's average annual energy bill.
4. There are currently 19,000 residential customers coded for hardship in UI's billing system.
5. There are currently 78,000 electric customers and 12,000 gas customers in Eversource's service territory who have demonstrated proof of hardship; 75,000 of those customers are participating in a utility arrearage forgiveness program.
6. Over the past two months, Eversource customer service representatives directed 1,300 customers to their local Community Action Agency to apply for the Connecticut Energy Assistance Program.
7. Homeowners and renters with incomes at or below 60% of the state median income are eligible for the Home Energy Solutions – Income-Eligible program.
8. Operation Fuel provided direct energy bill assistance to over 7,000 households in 2018 and over 5,400 households in 2019.
9. Operation Fuel receives 72% of its revenue from ratepayers through the Systems Benefit Charge.
10. Despite Operation Fuel receiving the majority of its funding from ratepayer contributions through the Systems Benefit Charge, the organization is not statutorily required to report to PURA on program activities.

## **IV. CONCLUSION AND ORDERS**

### **A. CONCLUSION**

Pursuant to Conn. Gen. Stat. §§16-11 and 16-244i, the Authority directs Eversource and UI to take immediate actions to assist residential customers in paying their energy bills this winter season, as ordered below. The Interim Decision invites Operation Fuel to submit a proposed reporting mechanism, timeline, and associated metrics related to Operation Fuel program activity.

The Authority will continue to hold Public Forums and/or Solutions Days technical meetings to discuss other barriers and solutions to energy affordability for the residential customer class, as well as on energy affordability for commercial and industrial customer classes. The Authority will also continue to pursue opportunities for data sharing between the Companies and DSS, and the cross-promotion of programs with DSS and the CAAs, among other organizations.

### **B. ORDERS**

For the following Orders, each Company shall submit one original of the required documentation to the Executive Secretary, 10 Franklin Square, New Britain, Connecticut 06051 and file an electronic version through the Authority's website at [www.ct.gov/pura](http://www.ct.gov/pura). Submissions filed in compliance with the Authority's Orders must be identified by all three of the following: Docket Number, Title, and Order Number. Compliance with orders shall commence and continue as indicated in each specific Order or until the Company requests and the Authority approves that the Company's compliance is no longer required after a certain date.

1. No later than January 3, 2020, Eversource and UI shall each submit to the Authority a proposed schedule for the series of outreach and education events each Company will hold for members of the public during January and February, 2020 in accordance with the requirements in Section II.A.3 of this Interim Decision (i.e., six events to be held in Eversource's service territory and four events to be held in UI's service territory).
2. Before the first of the outreach events required pursuant Section II.A.3, each Company shall submit to the Authority the materials to be used at the outreach and education event.
3. No later than January 17, 2020, the Companies shall each submit for Authority approval, a fact sheet – or a series of “one-page” fact sheets – that clearly, comprehensively, and concisely summarize relevant information to hardship and non-hardship customers with respect to the Company programs, policies, and procedures listed in Section II.A.1 of this Interim Decision.
4. No later than January 17, 2020, the Companies shall each submit for Authority approval, a sample script to be used by their customer service representatives that addresses questions from residential customers who contact their EDC to express

concern about their ability to pay their electric bill as outlined in Section II.A.2 of this Interim Decision.

5. No later than April 1, 2020, Eversource and UI shall each file a report summarizing the effectiveness of the series of outreach and education events conducted in January and February, 2020. At a minimum, the report shall include:
  - a. A list of the dates, locations, times of each completed event;
  - b. The number of attendees at each event;
  - c. A description of how the series of events were advertised, including any partnerships established with community advocates; and
  - d. Any presentations and/or other materials provided at the events.

**DOCKET NO. 17-12-03RE01 PURA INVESTIGATION INTO DISTRIBUTION  
SYSTEM PLANNING OF THE ELECTRIC  
DISTRIBUTION COMPANIES - ENERGY  
AFFORDABILITY**

This Decision is adopted by the following Commissioners:

Marissa P. Gillett

John W. Betkoski, III

Michael A. Caron

CERTIFICATE OF SERVICE

The foregoing is a true and correct copy of the Decision issued by the Public Utilities Regulatory Authority, State of Connecticut, and was forwarded by Certified Mail to all parties of record in this proceeding on the date indicated.



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Jeffrey R. Gaudiosi, Esq.  
Executive Secretary  
Public Utilities Regulatory Authority

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December 18, 2019

Date