

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

June 9, 2021

By the following Commissioners:

Marissa P. Gillett
John W. Betkoski, III
Michael A. Caron

INTERIM DECISION

TABLE OF CONTENTS

I. INTRODUCTION	1
A. SUMMARY	1
B. BACKGROUND OF THE PROCEEDING.....	1
C. CONDUCT OF THE PROCEEDING	2
D. PARTICIPANTS	2
II. TRACK 4 ACTIVITIES	3
III. PRO RECOMMENDATIONS AND AUTHORITY ANALYSIS	3
A. RETRAIN CUSTOMER SERVICE REPRESENTATIVES (CSRs)	3
B. RETRAIN COMMUNITY ACTION AGENCIES (CAAs).....	4
C. PRIORITIZE MARKETING EFFORTS IN THE PLACES CUSTOMERS FREQUENT	5
D. PARTNER WITH STATE AND LOCAL GOVERNMENT OFFICIALS ON COMMUNICATIONS.....	5
E. ENHANCE PAYMENT CENTERS	6
F. CROSS-MARKETING WITH ENERGY EFFICIENCY PROGRAMS.....	7
G. OFFER MORE FLEXIBLE PAYMENT ARRANGEMENTS	7
IV. SPRINT PARTICIPANTS CONCERNS WITH CONSULTANT	8
V. CONCLUSION AND ORDERS	9
A. CONCLUSION	9
B. ORDERS	9

INTERIM DECISION

I. INTRODUCTION

A. SUMMARY

In this Decision, the Public Utilities Regulatory Authority (Authority or PURA) approves certain recommendations provided in the Sprint Track 4 Report, which concluded the Targeted Marketing Campaign 100-Day Sprint, submitted in the instant proceeding by the Prosecutorial Staff of the Authority on October 30, 2020.

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 investigate further 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.

On January 22, 2020, the Authority issued a Procedural Order establishing four Sprint Tracks in Docket No. 17-12-03RE01: Track 1: Utility-Agency Coordination on Identifying Hardship Eligibility; Track 2: Benchmarking Matrix; Track 3: Guidance for Medical Hardship Recipients; and Track 4: Targeted Marketing Campaign. PURA appointed Prosecutorial Staff (PRO) to serve as facilitators for all four Sprint Tracks.

The Authority directed Track 4 Sprint participants to "provide guidance on improvements to the [electric distribution companies (EDCs)] education and outreach materials to be used in a targeted marketing campaign to promote energy assistance programs and other resources available to residential customers who experience difficulty paying their energy bills in full." Procedural Order, dated January 22, 2020, p. 4. The EDCs were directed to hire "a marketing campaign specialist to collaborate with Sprint participants to develop materials and a marketing campaign for the Authority's approval." Id. On June 17, 2020, the EDCs selected the American Association of Blacks in Energy (AABE) as the marketing consultant for Track 4.

A. Conduct of the Proceeding

By Correspondence dated October 30, 2020, PRO submitted a report on Sprint Track 4 with recommendations for actions the EDCs may implement as first steps toward the long-term shift toward achieving a more customer centric way of conducting business, specifically with regards to communicating existing energy assistance programs (Track 4 Report).

By Notice of Written Comments dated December 3, 2020, the Authority requested docket Participants and interested stakeholders to submit written comments on the Track 4 Report. On December 23, 2020, the Authority received five sets of written comments regarding the Track 4 Report.

The Authority issued a proposed Decision in this matter on May 21, 2021. All Participants were provided the opportunity to submit Written Exceptions on the proposed Decision.

C. PARTICIPANTS

The Authority recognized the following as Participants to the proceeding: the Office of Consumer Counsel (OCC), Ten Franklin Square, New Britain, CT 06051; the Commissioner of the Department of Energy and Environmental Protection (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; Senator Richard Blumenthal - District Office, 90 State House Square, 10th. Floor, Hartford, CT 06103; Connecticut General Assembly, Legislative Office Building, Room 4014, Hartford, CT 06106; Office of the Attorney General (AG), 10 Franklin Square, New Britain, CT 06051; DSS, 55 Farmington Avenue, Hartford, CT 06106; Connecticut Green Bank, 845 Brook Street, Rocky Hill, CT 06067; Public Utilities Regulatory Authority Prosecutorial Staff, Ten Franklin Square, New Britain, CT 06051; AARP-CT, 21 Oak Street, Suite 104, Hartford, CT 06106; Acadia Center, 31 Milk Street, Suite 501, Boston, MA 02109; Center for Children's Advocacy, 65 Elizabeth Street, Hartford, CT 06105; Connecticut Business and Industry Association, 350 Church Street, Hartford, CT 06103; Connecticut Conference of Municipalities, 900 Chapel Street, New Haven, CT 06510; Center for Children's Advocacy, 65 Elizabeth Street, Hartford, CT 06105; Connecticut Fund for the Environment/Save the Sound, 900 Chapel Street, Suite 2202, New Haven, CT 06511; Connecticut Industrial Energy Consumers, Couch White, LLP, 540 Broadway, P.O. Box 22222, Albany, New York 12201; Connecticut Legal Rights Project, Inc., P.O. Box 351, Silver Street, Middletown CT, 06457; Connecticut Legal Services, Inc., 1125 Main Street, Willimantic, CT 06226; Connecticut Veterans Legal Center, 11 Boston Post Road, 2nd. Floor, West Haven, CT 0651; Operation Fuel, 75 Charter Oak Avenue, Suite 2-240, Hartford, CT 06106; and PowerOptions, Inc., 129 South Street, 5th. Floor, Boston, MA 02111.

I. Track 4 Activities

PRO held two virtual meetings on June 26, 2020, and October 6, 2020, with AABE, the EDCs, and other Sprint participants. Track 4 Report, pp. 1-2. AABE, the EDCs' consultant, performed data collection and analysis, including collecting quantitative data through EDC customer surveys and qualitative data through EDC customer focus groups. PRO provided a facilitation role to enable Sprint Participants to share their insights with AABE, and served as a resource to AABE in their understanding of the EDCs' current marketing efforts, and opportunities to propose changes that will promote greater participation in the EDCs' arrearage forgiveness programs. Track 4 Report, p. 2.

II. PRO RECOMMENDATIONS AND AUTHORITY ANALYSIS

A. RETRAIN CUSTOMER SERVICE REPRESENTATIVES (CSRs)

PRO recommends that the Authority order the EDCs to submit verification periodically that its CSRs and those of its third-party vendors have undergone diversity training, training in active listening while engaging with customers, and training regarding the specifics of all payment arrangements offered by the company, including the hardship plans. Furthermore, PRO recommends that the Authority should order the EDCs to monitor CSR and third-party vendor calls monthly to ensure the CSRs and credit and collections representatives are embodying a customer centric attitude. PRO also recommends that the Authority consider establishing metrics to ensure CSR training is conducted in an effective manner. Lastly, PRO notes that the Authority's Consumer Affairs Unit (CAU) also may request recordings of any calls resulting in complaints to the Authority. PRO Track 4 Report, pp. 9-10.

Order No. 3 in the Interim Decision dated December 2, 2020 in this proceeding (Order No. 3), directed the EDCs to:

No later than January 15, 2021, and on a quarterly basis thereafter, the EDCs are each directed to submit a compliance filing in this docket documenting any enhancements or trainings that transpired during the previous quarter for their credit and residential CSRs.

Interim Decision dated December 2, 2020, p. 23.

The Authority issued Order No. 3 so that the Authority and all docket Participants may monitor and comment on the continued efforts by the EDCs to comply with the spirit and intent of the recommendations articulated in the Sprint Track 1 Report. See Sprint Track 1 Report, dated June 3, 2020, pp. 23 - 25. In keeping with this principle and in accordance with PRO's Track 4 recommendations, the Authority further directs the EDCs to separately highlight in its compliance filings related to Order No. 3 any enhancements or trainings over the previous quarter for the EDCs' internal CSR staff and third-party vendors related to: 1) diversity training; 2) active listening training; and 3) payment plan and energy assistance program training.

Regarding PRO's recommendation to monitor CSR and third-party vendor calls and the ability for the Authority's CAU and Office of Education, Outreach, and Enforcement (EOE) to audit the EDCs' calls, the Authority ordered the following actions through the Procedural Order dated November 18, 2020, in Docket No. 20-03-15, Emergency Petition of William Tong, Attorney General for the State of Connecticut, for a Proceeding to Establish a State of Emergency Utility Shut-Off Moratorium:

Further, the Authority directs EOE to monitor the [utilities'] communications with their customers that directly or indirectly relate to payment arrangements, including but not limited to the COVID-19 payment plans and hardship programs during the pendency of this [Docket No. 20-03-15]. The Authority reiterates that EOE may request a weekly sample of communications collateral¹ from the [utilities regulated by PURA]. EOE may advise the Authority after each weekly review of any and all violations in which the Authority should issue a Notice of Violation (NOV) along with suggested fines. Any such NOV shall consider whether the [utilities regulated by PURA] have complied with previous Authority orders in this proceeding...

Procedural Order dated November 18, 2020, pp. 1-2.

The Authority directs EOE to continue this practice of auditing the calls and other customer communications of the EDCs as directed in Docket No. 20-03-15, until at least July 1, 2022.

B. RETRAIN COMMUNITY ACTION AGENCIES (CAAs)

Based on the AABE Report, the CAAs indicated the need for more robust training. Track 4 Report, p. 10. While DSS ultimately oversees the CAAs, the EDCs must nonetheless ensure the CAAs receive comprehensive training not only on the content of the EDC portal, but also on the full suite of its hardship protections and energy assistance resources available. Some customers interact with their CAA as a first step and rely on their CAA to guide them through the entire application process for energy assistance. The EDCs, therefore, must ensure the CAAs are trained to actively listen to customers, ask the correct questions, and guide the customer through collecting and submitting the correct application information. Id.

As noted above, the Authority issued an Interim Decision in this docket on December 2, 2020, which directed both UI and Eversource to submit quarterly compliance filings, beginning January 15, 2021, documenting any enhancements or trainings that transpired during the previous quarter for their credit and residential CSRs. In keeping with the spirit and intent of the recommendations articulated in the Sprint Track 1 Report and with the Track 4 Report recommendations, the Authority further directs the EDCs to separately highlight in its compliance filings related to Order No. 3 any enhancements or trainings provided over the previous quarter for the CAAs, including providing the materials provided to the CAAs in any trainings that were conducted.

¹ Including but not limited to call center recordings, sample mailings, and sample emails.

C. PRIORITIZE MARKETING EFFORTS IN THE PLACES CUSTOMERS FREQUENT

AABE recommended that the EDCs increase their community presence. PRO believes that part of building a lasting community presence is providing relevant information in places where people can use it. Although AABE did not offer a comprehensive list of the types of outlets to include in a marketing campaign, PRO believes the EDCs should evaluate which outlets are most likely to meet customers “where they are.” PRO suggests that the EDCs could place information sheets with tear-offs in locations such as medical clinics, pediatrician’s offices, laundromats, Department of Social Services offices, Department of Motor Vehicle facilities, town human services offices, transportation centers, and in the lobbies or common areas of public housing. In addition, PRO offers that community-oriented locations such as places of worship, schools, local grocery stores, thrift stores, and food banks could also serve as touch points for the EDCs to provide marketing materials that highlight energy assistance programs.² The places where people live and go for help are natural advertising outlets that the EDCs must utilize. Track 4 Report, p. 10.

The Authority concurs with the recommendation to increase the EDCs’ presence in the communities they serve. In their Written Comments dated December 22, 2020, the EDCs suggested that instead of “tear-offs”, PRO and the Authority should consider posters that provide special hardship program information with a QR code that customers can scan with their smartphone. This serves the dual purpose of being measurable and enabling customers to take the information with them for future reference. The Authority believes it is important to have the opportunity to evaluate the efficacy of any proposed treatment intended to increase or enhance communication between the utilities and Connecticut residents. Consequently, the Authority directs the EDCs to propose a detailed community-based communication plan in the next arrearage forgiveness proceeding to begin on July 1, 2021, which incorporates the use of both “tear-offs” and QR codes. Further, the plan must be accompanied by a detailed implementation schedule and cost estimates for both one-time and recurring expenses with individual expenses in excess of ten (10) thousand dollars each included as a separate line item. All participants in the arrearage forgiveness program docket will be afforded an opportunity to comment on the EDCs’ proposal(s).

D. PARTNER WITH STATE AND LOCAL GOVERNMENT OFFICIALS ON COMMUNICATIONS

The Track 4 Report identifies local, state, and federal elected officials, who have direct and often frequent communications with their constituents, as an underutilized resource in communicating information regarding the utilities energy assistance programs to the public. Elected officials communicate with their constituents through social media, email newsletters, and constituent affairs offices, and are a trusted source of information by many. Track 4 Report, p. 11. For example, PRO notes that Connecticut Congressional representatives have previously provided information about CEAP, without mention of the utility hardship protections and payment assistance programs; ultimately, while promotion of CEAP in any form is a positive outcome, it is a missed opportunity not to also mention utility hardship protections and payment assistance programs. As AABE noted, the EDCs must overcome a level of distrust among many customers; therefore, using other sources

² The Authority adds public libraries and community centers to the lists provided in the Track 4 Report.

to distribute the information may help important messages regarding energy assistance reach more customers. Id.

The Authority recognizes that AABE did not produce marketing campaign materials for Track 4. As a result, the Authority directs the EDCs to propose a public officials communications plan in the next arrearage forgiveness proceeding to begin on July 1, 2021, which includes how other entities such as the CAAs and elected officials can participate in disseminating information about energy assistance. Further, the plan must be accompanied by a detailed implementation schedule and cost estimates for both one-time and recurring expenses with individual expenses in excess of ten (10) thousand dollars each included as a separate line item. All participants in the arrearage forgiveness program docket will be afforded an opportunity to comment on the EDCs' proposal(s).

E. ENHANCE PAYMENT CENTERS

AABE suggested in its report that the EDCs enhance payment centers by creating "a network of community payment locations, leveraging local community businesses" and community centers. AABE Report, p. 15. AABE found that peer utilities had used the payment locations to connect with customers, but a key step is ensuring the payment centers are open during hours that fit customers' schedules. Id.; Track 4 Report, p.11.

PRO agrees with AABE that payment centers can be used to establish a community presence but reiterates that the value of payment centers is greatly diminished if they cannot process the payments received in real-time. Track 4 Report, p. 11.

The Authority concurs that it is important that payment centers fit customers' schedules and the EDCs billing system reflects payments in real-time. The value of a convenient payment center that provides real-time payment is greatly increased with both features. The Authority acknowledges the efforts already in place by both EDCs but believes that more can be done to add to the value these centers provide. Therefore, the Authority directs the EDCs to negotiate contracts with entities that can provide more choices for customers within their respective territories. Specifically, the Authority notes that Eversource uses payment centers at Walmart, whereas UI utilizes payment centers with Western Union. The Authority directs the EDCs to, at a minimum, explore expanding payment center capabilities within their service territories at locations and businesses with which the other EDC has an existing relationship. The Authority directs the EDCs to provide a status report on expanding payment center options by November 1, 2021. Ultimately, the EDCs should look to increase the number of locations that can provide payment services that do not charge a customer fee,³ as much as possible. Lastly, the Authority directs both EDCs to display the list of payment center locations on their respective websites along with the fees associated with location, if any, by July 1, 2021. The Authority directs the EDCs to include this list with any future disconnection notices sent to customers. However, if the payment center locations are too voluminous to list

³ Eversource in its Written Exceptions, sought clarification regarding the statement: "...the EDCs should look to increase the number of locations that can provide payment services without an additional cost to customers". Eversource Written Exceptions dated June 2, 2021, pp.3-4. The Authority clarified by modifying the above paragraph to clearly articulate that the EDCs should look to provide more convenient third-party payment locations that do not charge a customer fee.

on the EDC's website,⁴ both EDCs should direct their customers to the payment center's website, identifying the customer charge associated with using that payment center, providing a link to where customers may search for the most convenient payment location by town or zip code, and directions for how to conduct such search on the payment center's website.

F. CROSS-MARKETING WITH ENERGY EFFICIENCY PROGRAMS

PRO suggests that customers applying for either the Home Energy Solutions -Income Eligible or hardship protections should also be eligible for the other program. Further, energy efficiency information can benefit customers with high bills. Therefore, PRO reiterates its recommendation from Sprint Track 1 Report that the EDCs cross-market these products and ensure that a customer enrolling in one realizes that they should also enroll in the other. Track 4 Report, pp.11-12.

Pursuant to Decision dated September 30, 2020, in Docket No. 20-07-04, 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 2020-2021, the Authority established that it is essential that customers receive messages in a consistent format from both the EDCs and CAAs, and provided the Companies with additional steps to achieve this goal. As such, Order Nos. 14 through 21 direct the EDCs to ensure its CSRs and CAAs discuss weatherization programs when interacting with MPP and/or financial hardship participants. The Authority will continue to monitor the progress of cross-marketing with efficiency programs based on Order Nos. 14 through 21 in Docket No. 20-07-04 and adjust where necessary in the next arrearage forgiveness program docket to ensure (1) that customers are aware of the state's energy efficiency and weatherization programs and their benefits, and (2) that energy efficiency program participants receive information about the utilities' energy assistance programs and hardship protections.

G. OFFER MORE FLEXIBLE PAYMENT ARRANGEMENTS

PRO stated that although payment arrangements are not marketing per se, they represent an important means by which the EDCs interact with customers facing difficulties in paying their bills. AABE's Report focused on creating customers as allies and building trust within the communities the EDCs serve. As evidenced from the survey results, it is difficult for the EDCs to build trust and create allies among customers that feel they have no ability to negotiate an affordable payment with the EDC. Track 4 Report, p. 12.

⁴ UI in its Written Exceptions states that it is not feasible to provide the number of the many Western Union locations on their website. Instead, UI suggests that the Company directs its customers to the Western Union website and provide a link to where customers may search for the most convenience payment location by town or zip code. UI Written Exceptions dated June 2, 2021, p. 5.

Through Order No. 6 in the Interim Decision dated December 2, 2020, the Authority directed the EDCs to develop a proposal that would provide a consistent experience for its residential customers in obtaining a broader range of flexible payment arrangements, to be implemented after the enrollment period for the COVID-19 Payment Program concludes. Interim Decision, dated December 2, 2020, pp. 12, 24. The EDCs have a deadline of July 1, 2021, to submit the proposal to the Authority. The Authority directs the EDCs to submit the proposal as part the initial filing in the next arrearage forgiveness proceeding to begin on July 1, 2021, in addition to filing as compliance in this docket. All participants in the arrearage forgiveness program docket will be afforded an opportunity to comment on the EDCs' proposal(s).

III. SPRINT PARTICIPANTS CONCERNS WITH CONSULTANT

The Center for Children's Advocacy and Connecticut Legal Services, Inc. (together, Advocates) submitted comments pursuant to the Authority's request for Notice of Written Comments dated December 3, 2020. The Advocates stated that they requested AABE forward relevant materials that it previously created that targeted communications to low-income energy customers. AABE responded that they had not previously worked with low-income customers on energy issues, and therefore did not have any materials to share. Based on this response, the Advocates argue that given the clear goals articulated and needs expressed regarding the final product expected to be provided by the Track 4 Marketing Specialist, it is unclear why the decision was made to select a company with no relevant low-income population experience. The Advocates further assert that AABE's Report reiterates the previously articulated lessons from the other Sprint Tracks in this proceeding and provides minimal new information. Moreover, the Advocates believe that AABE's report provided little, if any, Connecticut-specific actionable marketing guidance. Written Comments, dated December 23, 2020, p. 2. The Advocates stated that the Track 4 process did not fulfill the expectations laid out by the Authority, and the final product certainly does not warrant the \$100,000 cost. As a result, the Advocates respectfully request that Authority review the prudence of this expenditure in the appropriate future proceeding(s) and consider whether these costs should be disallowed. Id.

The Authority has reviewed the recommendations made in the Track 4 Report, as well as the stakeholders' comments provided in response to the Sprint Track 4 Report. The Authority finds the comments provided by the Advocates, and summarized above, concerning. Further, as implied in the Track 4 Report in several instances, neither AABE nor the EDCs developed or provided materials or a marketing campaign, despite clear direction for the EDCs to do so. By the Notice of Procedural Order dated January 22, 2020, in the present docket, the objective of Track 4 was to provide guidance on improvements to the Companies' education and outreach materials to be used in a targeted marketing campaign to promote energy assistance programs and other resources available to residential customers who experience difficulty paying their energy bills in full. The Procedural Order goes on to direct the EDCs to retain "a marketing campaign specialist to work with the EDCs and Sprint participants to develop materials and a marketing campaign through this Sprint to submit to the Authority for approval." Procedural Order, dated January 22, 2021, p. 4. Neither Connecticut-specific marketing materials nor a marketing campaign to promote awareness of energy assistance programs were submitted by either the EDCs or their consultant; no other new resources

were developed or submitted to the Authority as a result of Track 4 to help achieve the goal of promoting available energy assistance programs to residents who have trouble paying their energy bills. Based on the foregoing, the Authority will review the prudence of retaining AABE through the annual Rate Adjustment Mechanism (RAM) proceeding through which the EDCs seek cost recovery for AABE's services related to this docket. The Authority directs the EDCs to provide the monthly invoices associated with the work performed by AABE for Sprint Track 4 into the relevant RAM proceeding no later than June 15 of the year of such proceeding.

IV. CONCLUSION AND ORDERS

A. CONCLUSION

Based on a review of the above-described record, the Authority makes findings with respect to certain recommendations provided in the Track 4 Report. The Authority hereby approves the recommendations in the attached reports, subject to the conditions and directives articulated herein, as the final disposition of the matters in Track 4 of the 100-Day Sprint Initiative.

In addition, the Authority acknowledges that the AABE report recommends measures already discussed and adopted in previous Decisions in this docket and through Docket Nos. 20-03-15 and 20-07-04. Should EOE or other Sprint Participants believe there are further measures that should be discussed and approved related to the report or the PRO Track 4 Report, they are encouraged to bring it to the Authority's attention in the next arrearage forgiveness docket beginning July 1, 2021.

B. ORDERS

For the following Orders, the Company shall file an electronic version through the Authority's website at 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.

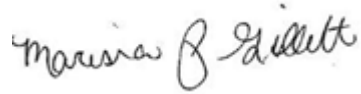
1. On or before June 15 of the relevant year, the Authority directs the EDCs to each provide in the Rate Adjustment Mechanism (RAM) proceeding through which the EDCs seek cost recovery for AABE's services the monthly invoices associated with the work performed by AABE in relation to this docket. The Authority will review the prudence of retaining AABE through the applicable RAM proceeding.
2. On or before July 1, 2021, the Authority directs both EDCs to display the list of payment center locations on their respective websites along with the fees associated with each location, if any. If the payment center locations are too voluminous to list on the website, both EDCs should direct their customers to the payment center's website, identifying the customer charge associated with using that payment center, providing a link to where customers may search for the most convenient payment location by town or zip code, and directions for how to conduct such search on the payment center's website. Additionally, the Authority directs

the EDCs to include this list with any future disconnection notices sent to customers after July 1, 2021.

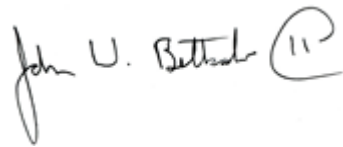
3. On July 1, 2021, the Authority directs the EDCs to submit the proposal required by Order No. 6 in the Interim Decision dated December 2, 2020 as part of its initial filing in the next arrearage forgiveness proceeding, in addition to filing such proposal as compliance in this docket.
4. On July 1, 2021, the Authority directs the EDCs to propose in the next arrearage forgiveness proceeding a detailed community-based communication plan as discussed in Section III.C., which incorporates the use of both “tear-offs” and QR codes. Further, the plan must be accompanied by a detailed implementation schedule and cost estimates for both one-time and recurring expenses with individual expenses in excess of ten (10) thousand dollars each included as a separate line item. All participants in the arrearage forgiveness program docket will be afforded an opportunity to comment on the EDCs’ proposal(s).
5. On July 1, 2021, the Authority directs the EDCs to propose in the next arrearage forgiveness proceeding a public officials communications plan as discussed in Section III.D., which includes how other entities such as the CAAs and elected officials can participate in disseminating information about energy assistance. Further, the plan must be accompanied by a detailed implementation schedule and cost estimates for both one-time and recurring expenses. All participants in the arrearage forgiveness program docket will be afforded an opportunity to comment on the EDCs’ proposal(s).
6. Beginning July 15, 2021, and on a quarterly basis thereafter, the EDCs are each directed to separately highlight in its compliance filings related to Order No. 3 in the Interim Decision dated December 2, 2020 any enhancements or trainings over the previous quarter for the EDCs’ internal CSR staff and third-party vendors related to: 1) diversity training; 2) active listening training; and 3) payment plan and energy assistance program training. Each EDC shall also separately highlight in such compliance filings any enhancements or trainings provided over the previous quarter for the CAAs, including appending the materials provided to the CAAs in any trainings that were conducted.
7. On or before November 1, 2021, the Authority directs the EDCs to, at a minimum, explore expanding payment center capabilities within their service territories at locations and businesses with which the other EDC has an existing relationship as directed in Section III.E. (e.g., UI work with Eversource and Walmart; Eversource work with UI and Western Union). The Authority directs the EDCs to provide a status report on expanding payment center options by November 1, 2021. Ultimately, the EDCs should look to provide more convenient third-party payment locations that do not charge a customer fee for using this option.
8. The Authority directs EOE to continue the practice of proactively auditing the calls and other customer communications of the EDCs regulated by the Authority as initially directed in Docket No. 20-03-15, and at least until July 1, 2022.

**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.



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

June 9, 2021

Date