

STATE OF VERMONT  
PUBLIC UTILITY COMMISSION

Case No. 20-0203-INV

Investigation into the establishment of reduced rates for low-income residential ratepayers of Vermont electric utilities	
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Order entered: 09/28/2021

**ORDER REQUESTING INFORMATION**

**I. INTRODUCTION**

This proceeding concerns an investigation by the Vermont Public Utility Commission (“Commission”) into the establishment of reduced rates for low-income residential ratepayers of Vermont electric utilities.

On July 8, 2021, the Commission held a workshop in this proceeding during which the Vermont Department of Public Service (“Department”), Green Mountain Power Corporation (“GMP”), and GDS Associates, Inc. (“GDS”) presented materials on GMP’s Energy Assistance Program (“EAP”), including the findings and recommendations from an evaluation of that program by GDS in 2019 (the “Evaluation”).<sup>1</sup>

In today’s Order, the Commission requests information from the parties in this proceeding. First, the Commission requests information from all parties regarding the concept of a statewide mechanism for funding a program similar to the EAP and welcomes ideas regarding other potential ways to extend electric bill assistance to low-income customers of all Vermont utilities. Second, the Commission directs GMP, in association with the Department and GDS, where appropriate, to provide additional, detailed information to the Commission regarding the recommendations from the Evaluation.

**II. INFORMATION REQUESTS FOR ALL PARTIES**

Several utilities have expressed concerns about individually funding their own low-income programs because of the high percentage of low-income customers in their service territories. One potential way to address this issue would be to provide a statewide funding

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<sup>1</sup> The Evaluation may be found on ePUC (<https://epuc.vermont.gov/>), under Case No. 18-0126-PET in the “All Other Documents” tab.

mechanism—for instance, an on-bill charge would be paid by all utility customers in the state, the funds would be pooled, and the money would be distributed to the utilities based on the utilities’ number of customers, percentage of low-income customers, level of participation in the low-income program, or some other metric. When the Commission previously looked at this issue in Docket 7535, the Commission noted that 30 V.S.A. § 218(e) does not provide the option of “authoriz[ing] utilities to recover their program-related costs through recourse to the state’s *general fund*.”<sup>2</sup> However, an on-bill charge and pooling mechanism would not require reimbursement from the general fund. Further, the utilities have been using a legislatively authorized on-bill charge and pooling mechanism for many years for the Energy Efficiency Charge.

#### COMMISSION QUESTIONS

1. What are the utilities’ and other stakeholders’ views on creating a statewide funding mechanism to fund low-income bill assistance for all utility customers?
2. How could such an approach be executed under the current legal framework of 30 V.S.A. § 218(e), which provides that “the Commission . . . may issue an order approving a rate schedule, tariff, agreement, contract, or settlement that provides reduced rates for low-income electric utility consumers”?
3. What alternative ideas, if any, do the utilities have to extend electric bill assistance to low-income customers of all Vermont utilities while also addressing the concerns of some utilities regarding individually funding their own low-income programs because of the high percentage of low-income customers in their service territories?

### **III. INFORMATION REQUESTS FOR GMP, GDS, AND THE DEPARTMENT**

In November 2019, the Department and GMP filed with the Commission the results of the Evaluation. The Evaluation contained nine key findings and nine recommendations that could be used by GMP to “help shape efforts at increasing EAP enrollment.”<sup>3</sup> The Commission now seeks detailed answers about how GMP is implementing those recommendations to improve the effectiveness of the EAP.

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<sup>2</sup> Docket 7535, Order of 7/22/2011 (emphasis added).

<sup>3</sup> Evaluation at 2. The nine recommendations are reproduced in Appendix A to this Order.

COMMISSION QUESTIONS:

- 1) Is GMP using marketing efforts for other assistance programs (such as the VCAAP II, Vermont Emergency Rental Assistance Program, LIHEAP, etc.) to also encourage participation in the EAP?
- 2) Please describe the work GMP has done to expand outreach to the wider network of low-income support agencies to provide referrals to the EAP and to provide a link between GMP and the larger set of social programs that support low-income residents.
  - a) Also, what plans does GMP have for expanding this in the future?
  - b) How, if at all, is this outreach being coordinated or could this outreach be coordinated with outreach efforts related to the current arrearage assistance programs?
- 3) Is GMP considering a stronger person-to-person outreach effort (i.e., calling customers versus other means of communication, such as mailers, web advertising, etc.)?
  - a) If so, what would that outreach look like?
- 4) In the workshop, GMP stated that funding the EAP is becoming more challenging. At this time, has GMP identified any specific state and federal funding to support the EAP?
- 5) If there are not available state and federal funds or insufficient state and federal funds, what mechanism does GMP propose to continue funding the EAP (e.g., reduced benefits or increased EAP fees), particularly given the planned expansion of the income-level qualification for the EAP from 150% of the federal poverty guidelines to 185%?
- 6) What, if any, plans does GMP have to work with the Vermont Department for Children and Families (“DCF”) to develop an EAP application that can be submitted online?
  - a) Also, what, if any, barriers exist to GMP working with DCF to create an application that can be submitted online?
- 7) GMP has stated that it does not favor a program in which customers can self-certify that they qualify for the program. If GMP’s concern is fraudulent self-certification, how big a concern is it that this would actually occur, and, if it is a big concern, are there ways to address that?
- 8) While the Commission understands that GMP does not want to collect personal customer income and household data, what work would be necessary for GMP and DCF to create a shared data system that would be helpful to the administration of the EAP, including the applicant’s status; arrearage status once enrolled; and major events, such as disconnections, reconnections, exits from the program, and reenrollments?

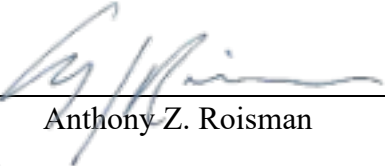
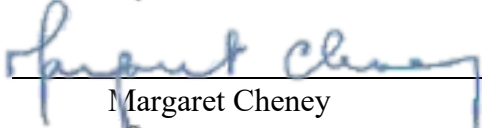
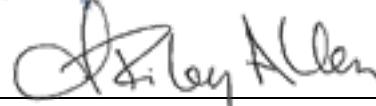
- 9) GMP stated that it may want to reconsider how it implements the arrearage forgiveness portion of the EAP, noting that some jurisdictions forgive outstanding balances over time as customers pay their monthly bill (rather than upfront, as with the EAP). What are the benefits and what are the downsides to having GMP forgive arrears over time rather than upfront?
- 10) While this was not raised in the Evaluation, has GMP considered tying enrollment in the EAP to enrollment in or referral to low-income efficiency programs for low-income customers?
  - a) Also, if not tying enrollment to such efficiency programs, has GMP considered referring low-income EAP participants to efficiency programs as a means of helping these customers reduce their usage and their bills?
- 11) What, if anything, is GMP doing to address language barriers for EAP-qualifying customers who do not speak English as a first language?

#### **IV. ORDER**

We ask all parties to file answers to the questions in part II of this Order **by no later than October 29, 2021**.

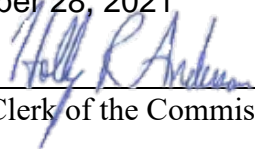
We direct Green Mountain Power Corporation, in association with the Vermont Department of Public Service and GDS Associates, Inc., where appropriate, to file answers to the questions included in part III of this Order **by no later than October 29, 2021**.

Dated at Montpelier, Vermont, this 28th day of September, 2021.

 _____ )	) PUBLIC UTILITY ) ) COMMISSION ) OF VERMONT
Anthony Z. Roisman )	
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OFFICE OF THE CLERK

Filed: September 28, 2021

Attest:   
\_\_\_\_\_  
Clerk of the Commission

*Notice to Readers: This decision is subject to revision of technical errors. Readers are requested to notify the Clerk of the Commission (by e-mail, telephone, or in writing) of any apparent errors, in order that any necessary corrections may be made. (E-mail address: [puc.clerk@vermont.gov](mailto:puc.clerk@vermont.gov)).*

## **APPENDIX A: EVALUATION RECOMMENDATIONS<sup>4</sup>**

### **RECOMMENDATION #1**

The EAP should continue its core administrative approach to utilizing DCF and CAAs, along with retaining its ongoing engagement with the broader network organizations that support low-income residents of Vermont.

### **RECOMMENDATION #2**

Should the opportunity arise for Green Mountain Power to increase the income eligibility threshold, it should do so. The current definition is lower than many electric utility affordability programs around the U.S. and lower than other Vermont programs that serve the low-income population. Doing so will increase the pool of income eligible customers and thereby likely lead to an increase in program enrollment.

### **RECOMMENDATION #3**

Green Mountain Power should investigate and adopt additional application methods, expanding the options to include electronic applications that can be submitted electronically or applications available within a Green Mountain Power customer's online account portal.

### **RECOMMENDATION #4**

GMP and DCF should collaborate on developing a unified data system that would enable both GMP and DCF to have long term tracking and visibility of EAP applicants and participants. Such a system does not need to be complex, but would be a shared system that tracks an applicant's status, key eligibility criteria (e.g., household size and income), arrearage status once enrolled, and major events, such as disconnections, reconnections, exits to the program and re enrollments, and ancillary organizations that have supported the customer (e.g., CAAs, other social support organizations assisting the applicant to apply).

### **RECOMMENDATION #5**

GMP should consider adopting a self-certification approach that enables customers to immediately receive the discounted rate benefit or consider retroactively applying a discounted rate (as a customer credit) back to the date of application. Self-certification may require an online portal or similar streamlined means of receiving such an application. Customers would need a full description of eligibility and application requirements to self-select and avoid misunderstandings. CAAs and DCF may be able to assist those customers that need guidance. The specific approach may depend on how

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<sup>4</sup> GDS Associates, Inc., *Assessment of the Green Mountain Power Energy Assistance Program* (November 2019), at 50-57.

GMP adjusts any application methods, the approach to data tracking, and could evolve or emerge over time as other changes are adopted. This recommendation is only related to the discounted rate offered by the EAP, with a need to consider how to handle accounts with arrears that would be eligible for arrears forgiveness.

#### **RECOMMENDATION #6**

Expand EAP outreach and awareness outside of the traditional social support network used by the program. Provide application and referral facilitation training to those that indicate an interest in more than being an outlet for static program materials.

#### **RECOMMENDATION #7**

GMP should consider adjusting its arrearage forgiveness approach to one of periodic forgiveness based on maintaining an account in good standing. Doing so will require careful arrearage tracking and a communication method so that participants see the changes to their account statements.

#### **RECOMMENDATION #8**

GMP should consider options for increasing the discount for program participants. The specific approach and level of discount may depend on administrative and program cost considerations, though when linked to reduced disconnections and arrears, additional parent costs may be dampened.

#### **RECOMMENDATION #9**

The EAP should consider how changes may affect the growth in program enrollments and participation. While the recommendations in this report provide suggestions on opportunities to drive growth, their selection and timing for adoption is unknown. A stepped approach may be reasonable, with careful tracking on the effects of changes informing the importance of and impact to subsequent changes.

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