

UM2114 Disconnection Practices Workshop 1 Breakout Room Notes

Notes from Michelle Scala

Breakout room # 3 notes:

Process Improvement

Advocates:

- Helpful to understand what the processes are and how utilities will provide the additional protections
- Thinking about smart meters and AMI, the ability to disconnect remotely and how does that fit into the process when disconnecting customers.

Utility:

- From the beginning-the time can vary from 45-64 days, bill out, notice sent out, call-aheads several days before the notice. Process and protections outlined this morning we follow. Additional protections with COVID moratoriums still in place.
- Gas utility does not have smart meters; would have to let the electric utilities respond.

Sensitivity Training/Trauma informed representatives

Advocates:

- What kind of training the call-center folks who are making the calls have with regard to de-escalation, trauma aware, call for disconnection a very stressful experience. How do the utilities assess this?
- Lights out in the cold. If you hold everything equal, Black and Latino households get disconnected more often. Speaks to the importance of having training, customer service people. Manifest in systemic ways. Talking to customers in debt, comment stated in the note - part of the training, dealing with people, explicitly be part of the training for customer service representatives.

Utilities:

- Our representatives go through training, be sympathetic, any struggles they may be voicing, certainly not have any judgement, pre-determined, try to avoid having any/ quality review of calls. My understanding that call durations have increased, they nearly doubled, on-going.
- Training advisors, positive customer experience, talk about care and concern, a whole bunch that goes into that, being knowledgeable and staying on top of solutions and products, exploring what is going to work and how do we make things easy, not just in the moment but in the future. As far as the empathy part- we get practice every day with this.
- We spend time talking with our advisors on this, review performance, have our quality assurance, look for opportunities, customer feedback, experience building on that, what are you

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doing right that is going well. We have a whole bunch of training we can send people to. This might be something they are not as good at. Use metrics

- CSRs training on that empathetic critical listening. As we go through moratorium. Tweak AMP. Instantaneous feedback. We can be nimble with pushing out training.
- We do a combination of training, and don't want to miss opportunities to hear about resources for folks that have trained in this area. We would love to follow-up

OPUC:

- What are the risks of not having CSRs with adequate sensitivity training?

Advocates:

- Increased distrust and fear. Utility is operating as a bill collector. Continued distrust of institutions and systems. We do see that in historically marginalized communities. Looking at how to address legacy of racism in policies. Culturally responsive approach.
- Definitely recognized the historical antagonism between certain institutions and the people of this country. Electricity and energy is something you need and utility companies are someone you have to pay to get that

Severe Weather Moratorium

Advocates:

- How we approach severe weather moratoriums. Struck by the reality that without the moratorium in place we could have seen more people die. Biggest mass casualty event in OR in recent history. In the December outages we saw many people die trying to warm themselves. In light of that reality, if it is 115 degrees today, and I'm not disconnected today, others that were disconnected earlier might not be reconnected despite the weather.
- Climate change increasingly impacting society while becoming harder and harder to predict

Access to Energy

Advocates:

- Important baseline to establish: Uninterrupted access to electricity or energy for those who choose to have it is a right. Can we test this group?
- What I believe personally is that electricity should be accessible without charge, it should be a public service. I want to acknowledge there are reliability events. I'm trying to get at a basic value statement that we should do everything to provide that access. We should not be disconnecting people. It is okay if the utilities are not there yet. Is this a value we all hold as we delve into these discussions?
- Access to electricity is a human right. This is not a controversial statement.
- Access to energy/electricity is necessary to participate in modern society, more so than ever before; restricting access to only those with means further exacerbates inequities.

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- People have a right to life, engaging in community, ability to pay should not be the difference between life and death
- This is why we are doing this work, we want to get to a spot where no one is disconnected for inability to pay. Long term goal.

Increasing access to energy for those with limited means

- Make electricity a public service and fund it the way we fund other public services, where:
 - Income is highly considered,
 - Tax refunds,
 - It's not a buy and sell relationship; it's provide and funds come from our status as residence
- Regarding alternatives: energy efficiency. Ariel Drehbol (adrehbol@acee.org) of the American Council for an Energy-Efficient Economy highlighted these utility best practices for targeting energy efficiency programs toward their most at-risk customers :
 - Efficiency Vermont (a lot like ETO, but in Vermont): using energy burden, they've identified a targeted set of programs that they'll pitch depending on a household's characteristics.
 - DTE in Michigan: Payment Troubled Pilot Program. Find customers on shutoff protection or low-income energy assistance and target these people with energy efficiency and technology offers.
 - ComEd in Northern Illinois: distressed communities approach. They look at the community level, so that efficiency is brought to the right small businesses, community centers. They think about wealth-building and ownership.
- Make it a subscription like community solar, subscribe to electricity

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Notes from Anna Kim

UM 2114 WORKSHOP Breakout Session Notes

7/22/21

Small group discussion break-out session to discuss the following questions:

1. Considering the current process for disconnections for non-payment, how would you assess or evaluate the manner in which utilities currently handle those procedures?

Are there policy updates that you might recommend? Is proper notification given?

The window of time in which a disconnection can occur – is it small enough, large enough, etc.?

(The goal for this question is process improvement.)

Are we looking at things differently? Are we looking for process improvements?

How to help the most potentially impacted customers

Utilities gave some background about the existing process.

Would like to know more about the process for medical certificates

PGE gives extra few days in the disconnect process for medical certificate

Avista does not disconnect those with medical certificate

What happens to deposits? Refunds? Interest on deposits? One utility responded that deposit refunded after a year of good history

Commission approves interest rates

2. Arrearage Management: Please describe an arrearage management program or arrearage management best practices you believe would cost effectively:

i. Reduce residential arrearages

ii. Prevent additional past due balances from re-accumulating/facilitate on-time payment behaviors.

Where possible, please point to data sources and/or real-world examples that serve to evidence your response.

Utilities noted they are learning now as they implement them

One pilot forgives 90% for paying 10%

Someone else suggested Avista tried to help the most burdened. Consider helping the most people possible. How many people can we help?

Match payment for medical certificate customers

First time looking at energy assistance to all customers, not income qualified.

CEP is about preventing arrearages in the first place

Problems accessing funds to help with fuel switching from oil to not-oil

How can we reduce energy burden to prevent the stress that comes with seeking energy assistance or avoiding shutoffs or living in dangerous situations

Preventative stuff ties into resiliency

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Multifaceted problem, plenty of factors

During the heat wave, a lot of stress about paying for the AC being on

Appreciating the Washington county example, local government helping reduce arrearages overall, and leveraging federal funds. Are other local governments using this mechanism?

Energy burden = energy use + income + rates

How to weatherize more homes

3. Alternatives to Disconnection:

a. Please describe alternatives to disconnection for non-payment. Alternatives should, at a minimum:

i. Be practicable and cost effective,

ii. Incentivize resumption of timely payment,

iii. Discourage habitual non-payment behaviors.

Where possible, please point to data sources and/or real-world examples that serve to evidence your response.

We did not have a comments specifically on this question.

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Notes from Bret Farrell

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(The goal for this question is process improvement.)

Cascade – Outlined the company's process for disconnection and what it currently looks like. Continual process of outreach to the customer, and specific check points to try and evaluate how to help customer avoid disconnection. Company has a "Risk Report" which is manually reviewed by their credit team before sending out team for disconnection. Last line of help is the disconnection technician offering support in-person before disconnecting.

CAOs – How do we better connect customers in crisis to agencies that can help them? Utilities may be directing customers towards agencies but customers might be intimidated by utility communications, and may never seek out help

Cascade provides customers with links to agencies for help as well as advertises agencies they work with to customers.

CUB – Expressed concern over winter moratorium and the specific temperature threshold

Customers sometimes are not even opening bills from utilities because they know that they are unable to pay so bill inserts may be very ineffective. Find better ways to communicate to customers. Try to find preferred contact method of customers

Avista – outreach is not just occurring with notices, utilities are running several different outreach campaigns at any given time trying to find effective ways to reach customers

CAOs – People want to and are trying to pay their utility bills, but it can be scary to talk to the utilities. Difficult for people to understand the disconnection timeline.

Simple, clean, uncomplicated processes for customers to understand

PGE- Find ways to build trust between customers and utilities

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Framing it as “Debt Relief” rather than arrearage management

Figure out how to maintain regular payments is key to avoiding falling deep into arrears

Categorical eligibility for assistance,

Better use of data to identify at risk communities

Percentage of income payment programs, and limit bills for low-income customers, level bill pay through new rates

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Notes from Max St. Brown

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Disconnections cause a lot of harm:

Power is off, you could be missing important information, ex: energy assistance application online, fridge and food, medication.

Disrupt daily life.

Many customers experienced outages last February.

What are the current practices: multiple notifications beyond the normal bill. About 10 days after non-payment a notice is sent. There are also multiple phone calls. Customers can opt into emails and texts. Goal is to engage with customers. Disconnection is the last resort.

Can customers choose their language preference? For PGE the notices are in English, and Company is working on making them more customer friendly. Also considering larger print for the important items on the bill.

Ideas to improve current disconnection process:

The length of time should be based on how quickly customers can get energy assistance. Do the protections allow customers to access energy assistance. If they are calling the utility and actively seeking assistance, they shouldn't be disconnected. Response: via UM 2114, if customers are actively seeking energy assistance, the Company is giving them more time (2 months).

PGE can send an email directly to the energy assistance agency on the customer's behalf. Ex: customer applied months ago, but application isn't proceeding.

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It is important to consider of systemic issues including living wages and the wealth gap.

Percentage of Income Payment Plan (PIPP) like in Ohio and Colorado where ability pay is taken into account.

Discussants have talked to families that have received the instant grant and found it successful. Its simplicity and ease of application was appreciated. Payment matching programs for example can be complicated and off-putting. How can we make it so that the best benefits are the easiest to get?

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Trying to find a longer term solution. Difficulty if customer has to reapply in four months. Setting customers up for success moving forward. Example, discounts, PIPP, flat rate. Enroll and stay enrolled in a program versus a program that is temporary.

HB 2475 allowing consideration of energy burden can help.

Access is important.

CAP agencies are overworked, phone lines might be closed, it is difficult to get into queue. In the future utilities can take assistance calls.

Energy efficiency can include poorly weatherized houses. Add more outreach for energy efficiency. Legislature this year passed increases in low-income weatherization funds.

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Energy efficiency can be a long term solution.

As an alternative to disconnection, leaving utility services on, but using a throttling technique where the kW is restricted, maybe can use a smart meter for example; some similarity to cell phone service where there's free low speed data service once the high speed data allotment is used up.

Comment submitted by Heather Moline via Survey

Energy efficiency as an alternative to disconnection:

Ariel Drehbol (adrehbol@acee.org) of the American Council for an Energy-Efficient Economy highlighted these utility best practices for targeting EE programs toward their most at-risk customers

Efficiency Vermont (a lot like ETO, but in Vermont): using energy burden, they've identified a targeted set of programs that they'll pitch depending on a household's characteristics.

DTE in Michigan: Payment Troubled Pilot Program. Find customers on shutoff protection or low-income energy assistance and target these people with energy efficiency and technology offers.

ComEd in Northern Illinois: distressed communities approach. They look at the community level, so that efficiency is brought to the right small businesses, community centers. They think about wealth-building and ownership.

Comments submitted by Shawn Bonfield via survey

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(The goal for this question is process improvement.)

Utilities are following the current guidelines required by Commission rules and their respective tariffs and go above and beyond what is required when it comes to notification of a potential disconnection for non-payment. So yes, proper notification is given as required. It should be made clear that not all agree that there is a problem with the current process and an outcome of this workshop series could be that nothing changes. To operate under a premise that things need to change in terms of the policies for disconnection is not an agreed upon baseline. Regarding the window of time for when a disconnection may occur, this question needs more specificity.

Much of this workshop series should focus on the factors affecting energy burden (i.e., income and energy efficiency) that prevent a customer from falling behind on their energy bills and potentially facing disconnection. We should further evaluate AMPs and various types of energy assistance and how to make it easier for more customers to receive assistance. Then we should focus on energy efficiency and how to enable Community Action Agencies to weatherize more homes than they do today. If we can reduce the energy burden for customers it will naturally result in fewer disconnections.

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In designing Avista's COVID-19 Debt Relief Program (AMP), we focused not on averages arrears, but on building a program that provided relief to nearly all customers in arrears. This meant increasing the maximum benefit amount to customers, such that we could completely eliminate the arrears for those customers receiving assistance. We at Avista believe a best practice is to consider what individual customers are experience rather than looking at an average customer.

Further, in 2019 Avista piloted an AMP program in WA for eligible low-income customers. Participating customers were required to pay 10% of their arrears each month in order to have 90% of their arrears forgiven. This pilot proved effective in encouraging regular payment behavior. As a result, Avista made this a permanent offering in WA and will roll this offering in OR on October 1st. Customers will be eligible to participate in the AMP twice every seven years. This is intended to get customers caught up on their arrears and promote the continuation of consistent payment behavior.

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At this time Avista continues to believe that disconnection for non-payment is necessary, however, greater focus should be placed on preventing customers from finding themselves in a situation of possible disconnection for non-payment. As shown in Avista's monthly disconnection reporting, from February 2019 through January 2020, 961 residential customers were disconnected for non-payment representing 1% of residential customers. While this is a small number in comparison to all customers served, it is not lost on us that disconnection may be detrimental to the households disconnected. With additional low-income weatherization, energy assistance, and outreach to customers in need, many of these disconnections may have been prevented.

We hope that Staff focuses on what can be done to prevent disconnections by way of connecting customers to available assistance, rather than simply focusing on the act of disconnection itself. When discussing additional assistance and weatherization it also remains important to understand the cost impact to all customers to support these efforts and what is fair for all customers.