

**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

Review of Universal Service and
Energy Conservation Programs

:

Docket No. M-2017-2596907

**INITIAL COMMENTS OF THE
UNITED WAY OF PENNSYLVANIA**

I. INTRODUCTION

On May 10, 2017, the Pennsylvania Public Utility Commission (“PUC” or “Commission”) entered an Opinion and Order to initiate a comprehensive review of the entire Universal Service and Energy Conservation (“USECPs”) model at Docket Number M-2017-2596907. When the Commission initiated this review, it acknowledged the importance of ample stakeholder feedback from stakeholders representing all interests, from low-income customers to consumer interest advocates to utilities throughout all of the steps of this process.

The United Way of Pennsylvania and PA 2-1-1 (the “United Way” and “PA 2-1-1”) appreciate the opportunity to provide comment on USECP model and low-income assistance programs, which are of critical importance in ensuring that low-income customers have safe, reliable and affordable utility services. The United Way’s Initial Comments will focus on a discussion of the 2-1-1 program, its history, its current offering and future enhancements to coordinate with the PUC and the utilities to provide broader services to the low-income populations of the Commonwealth.

II. BACKGROUND AND HISTORY OF 2-1-1

A. Introduction

PA 2-1-1 and the United Way of PA are pleased to submit comments and suggestions to the PA Public Utility Commission about universal services. We applaud the Commission for opening this comment period because we are aware of the challenges that low-income customers face daily as they struggle to pay their utility bills. We work daily to make sure individuals and families connect with the right services and agencies to allow them to maintain utility service and to gain self-sufficiency.

First, a brief background.

In 2010, there was no simple, efficient mechanism in Pennsylvania to connect those facing hunger, homelessness and other needs with the help needed. While our communities offer many, many resources to help people facing challenging times, the vast array of services and the lack of a centralized hub made making the right connection difficult at best. In their search for help, people called their churches, community groups, welfare offices, the Public Utility Commission, and neighbors. Often, the individual needing help would have to call several numbers in order to find the most appropriate resource. This exhausting process led many, already frustrated by the difficulties facing them, to simply give up.

And sometimes the right place to call was the very last place that people wanted to call – i.e. people needing help paying their utility bills often had no interest in calling the utility company, either due to fear of shut offs, or they just did not want to share details of their hardship (loss of a spouse or a child) that could actually lead to them getting assistance, with a customer service representative.

This situation was frustrating to all. Utility companies excel at providing critical services (gas, electric and water) to our communities. They sometimes struggle to connect with people needing assistance. Many utility assistance programs are underutilized; not for lack of need, but for other factors at the individual and community level. Additionally, utility providers can feel uncomfortable knowing that the person on the other end of the phone needs help with issues far beyond their area of expertise.

In 2011, the PA Public Utility Commission took a crucial step in addressing these issues by allowing for the implementation of 2-1-1 in Pennsylvania. Since 2011, 802,054 individuals have been connected to help through PA 2-1-1 by phone, text or email. Countless others have been helped by using our web site to find the information they need.

PA 2-1-1 applauds the wisdom of the PUC for approving the use of the 2-1-1 number in Pennsylvania. In this document, we will highlight some of the progress we have made and how it relates to the current research the PUC is doing on universal services programs.

B. What is 2-1-1?

Similar to 9-1-1, 2-1-1 is a nationally recognized, easy to remember phone number that quickly and effectively connects people in need with resources. In the case of 2-1-1, the connections are to human services and community resources tailored to meet callers' needs.

2-1-1 is accessible nationwide and is currently available to individuals in almost every county in the country, so that no matter where you are, you can call 2-1-1 and get connected to the help you need. As of February 2015, 2-1-1 was available to over 291 million Americans (93% of the entire population) covering all 50 states plus Washington, DC and Puerto Rico.

2-1-1 is there for people who need help, but don't know where to turn. 2-1-1 is uniquely poised to help people in getting the assistance they need because of its easy-to-remember number, comprehensive and accurate database, and the long-standing reputation of United Way as a community partner and a place to turn for help.

2-1-1 Resource Navigators are trained to address not only the reason for the person's call, but to listen for underlying (often causal) needs and to seek to address those as well. For example, people calling to find resources for food to feed their family may have recently lost their job and need assistance with returning to the workforce, or they may also have stopped taking care of their health needs or paying their utility bills. Understanding and addressing these secondary needs can make all the difference in providing stability for families.

As a central depository of information, 2-1-1 analyzes trends for new and emerging service needs and gaps and shares aggregated data and conclusions with non-profit and governmental agencies for planning and future resource allocation. 2-1-1 assists in response to and recovery from regional disasters and emergencies by partnering with emergency managers and agencies and providing easy access and accurate vetted information that needs to be communicated. It is also the barometer of the community for identifying needs, trends and gaps in service and communicating them to public and private decision-makers and funders. 2-1-1 partners with business in the community ensuring that working individuals have access to services that they may need to help them remain productive. Leading regional corporations provide critical financial support for 2-1-1 because they recognize its value.

PA 2-1-1's network of information and referral providers has experience serving as a single point of entry for connecting people to services. For example:

- In the East region, 2-1-1 provides coordinated entry for two counties to assess callers' need for emergency housing services; and
- In the Southwest region, 2-1-1 completes the intake process for people needing utility assistance in Butler County.

The strength of 2-1-1 is the ability to efficiently and compassionately assess needs; to determine eligibility for services; and to complete the required intake correctly. In all cases, referrals are given to address immediate needs, such as food, diapers, furniture, or school supplies.

C. How 2-1-1 has Grown

Since the PUC's ruling to launch 2-1-1 in 2011, significant growth has occurred:

- PA 2-1-1 launched with three counties in 2011 and now serves 59 counties with four additional counties scheduled to come on board in September. At that point, we will cover 99% of the state's population.
- 2-1-1 has expanded beyond phone. We are now available by phone, email and text in addition to offering robust websites for self-service access. Some regions also offer chat services. By expanding the modes of access, 2-1-1 allows customers to reach us via the communication method that works best for them.
 - Two extra benefits of the text feature are (1) the ability of individuals who are “out of minutes” to reach 2-1-1 by text. (2) the ability of the person in need to request help without fear that someone will overhear the conversation. (No one wants their co-workers to know that their utility service is about to be terminated.) Texting gives the individual much-needed privacy and dignity.
- 2-1-1 has developed a statewide database used by all regions. This database is the most robust listing of government and non-profit services in the Commonwealth. The use of a single database that is maintained by professional database managers working in local communities using national standards has proven to be an efficient way to develop a database that is used by 2-1-1 staff, local agencies as well as the general public.
- 2-1-1 has grown from reactive to proactive. Since 2014, 2-1-1 uses educational push text messages to provide information on important community programs that help individuals to stretch their budgets such as LIHEAP or summer food programs. We bring information about services to people without them needing to call us to request the information.
- 2-1-1 has seven regions that are coordinated and work effectively together for statewide or national concerns.
 - 2-1-1 has been contracted by the Center for Disease Control to provide information and referral services during a flu pandemic. For the past two years, 2-1-1 has been an active partner in Flu on Call, the project that trains and certifies 2-1-1 staff and volunteers as well as a nationwide simulation of the event.
 - 2-1-1 also works closely with local government and lead agencies to respond to emergencies such as floods and natural disasters.

- Across the state, contacts continue to grow. Phone calls, texts, chats, and unique web hits have increased to 132,442 in the first half of 2017. In 2011, there were 5,398. That is a 2,353.53% increase. More importantly, it demonstrates the needs that 2-1-1 is addressing with professional staff and nationally approved service delivery methods.
- 2-1-1 is accessible via a translation service in over 250 languages and through the 711 Relay Service. In addition, one center employs bilingual Resource Navigators. The 2-1-1 website is also accessible via language translation. Access to information by all is a cornerstone of our service.

The above examples represent a few of the ways that the PUC's approval of 2-1-1 in Pennsylvania has benefitted the residents of the Commonwealth of Pennsylvania.

Based on the experiences of existing 2-1-1 programs, the greatest value has been created through:

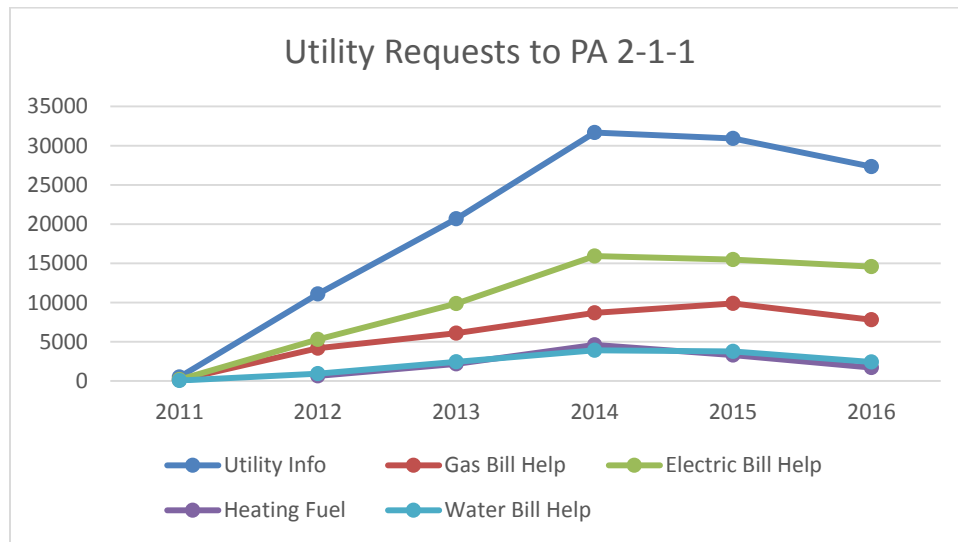
- 1) More EFFECTIVE connections to services for people in need;
- 2) Greater EFFICIENCY for Pennsylvanians. In the last full year, PA 2-1-1 answered 177,594 calls, texts, chats and emails from individuals in need across the state and PA 2-1-1 websites had over 81,000 unique visitors. 2-1-1 provides safe, confidential service and serves as a resource for those experiencing domestic violence.
- 3) Use of INNOVATIVE technology, including a single state-of-the-art database for the entire state of Pennsylvania, to coordinate the availability of resources across county and state lines, track the met and unmet needs of callers, and ramp up quickly to serve hundreds of thousands in times of emergency.

III. PA 2-1-1'S ROLE IN UTILITY ASSISTANCE

A. 211 is Currently Helping with Utility Issues

Across the state, 2-1-1 has provided help to more than 546,218 Pennsylvanians who have called to request utility assistance since the launch of 2-1-1 in 2011. Help with utilities is always a top request, topped only by help with rent. The two needs are intertwined and the need the customer presents with depends upon which bill is most urgent that day. Our staff is experienced at compassionately helping customers to navigate the process of getting help with utility bills, explaining how utility companies can help and connecting people to community agencies and churches for additional help.

PA 2-1-1 is often the organization that utilities, agencies, churches, employers and more tell people to reach out to when the individual appears to be out of options for finding a way to pay their utility bills. Often, the individual has maxed out the number of medical holds they are entitled to and still has the medical or family issue that is making it difficult for them to manage payment for utility services. PA 2-1-1 welcomes these calls because it gives us an opportunity to ensure that everything possible has been tried. We will determine if there are any funds that may be available in the community to assist the individual. We will connect then with food pantries, school clothes, diapers and any other tangible aid programs that we can find. We will make sure they are in contact with the utility.



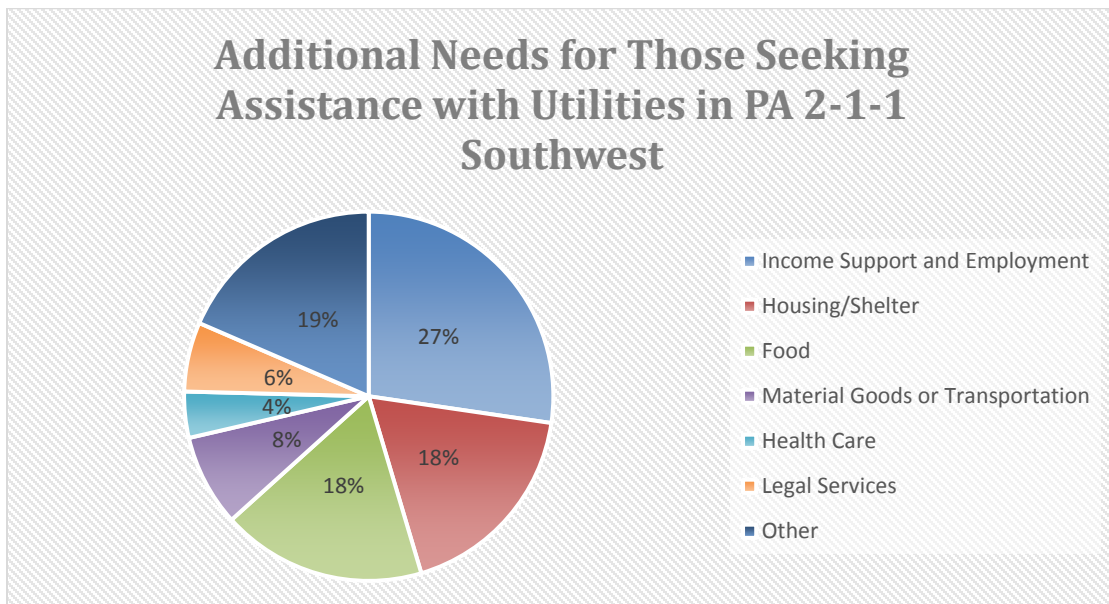
B. 211 is Poised to be Even More Helpful to Financially Struggling Utility Customers.

The challenge of connecting struggling utility customers to existing resources is how to address the need to reach and serve those most in need of human services and community resources—including Universal Service programs—and to do this in a comprehensive and coordinated way. Utility companies want to assist low-income customers, but theirs is often the one number that those in need of assistance do not want to call. A recent study by the Heinz College at Carnegie Mellon University identified several reasons individuals in need don't reach out to the utility provider, including:

- not understanding the policies and procedures for enrollment;
- fear of having their service terminated if they are unable to meet program guidelines;
- lack of awareness of available assistance; and
- not wanting to share details of their hardship (loss of a spouse or a child) that could actually lead to them getting assistance, with a utility customer service representative.

2-1-1 can fill this gap.

1. More Pennsylvanian's are recognizing 2-1-1 as a centralized point-of-referral for human service needs. The three-digit, easy-to-remember number provides a unique opportunity for marketing utility assistance programs, raising awareness of the process for enrolling, and connecting to agencies who can assist with the process.
2. 2-1-1 is able to provide a more holistic approach to services than any other information or referral resource. Rarely do individuals require help with only one need. When people call regarding utility assistance, they are often in need of additional help. Because they called 2-1-1, they were able to be referred to additional resources.
 - For example, in *PA 2-1-1 Southwest* last year, 36% of those contacting 2-1-1 for utility assistance also needed assistance with housing and food. 2-1-1 was able to connect these individuals and families to other services.



Additionally, people who called requesting help and other services were also in need of and able to be referred for utility assistance. In 2015-16, in the Southwest region nearly 15,000 of those contacting 2-1-1 for assistance with other needs were connected to utility assistance.

- 18.4% of those seeking youth programming
- 14.2% of those seeking assistance with housing
- 11.3% of those seeking assistance with food

- 9.1% of those seeking assistance with income support or employment
- 22.7% of those seeking assistance with taxes
 - 854 were connected to Electricity Efficiency & Conservation Kits that reduce electric utility costs
 - 93 needed utility payment assistance (26 for electric bills)

Statewide data paints a similar picture, demonstrating that those who need help with utilities most often also need assistance with housing and food as well. People in crisis present to 2-1-1 with the need that is most pressing that day. That need is one of many needs. A skilled, compassionate 2-1-1 Resource Navigator is trained to take the time to discover and address the unspoken need.

The above examples show that 2-1-1 is a key partner in utility assistance provision. The PA 2-1-1 network currently benefits utility companies by providing referrals for people who need help with their utility bills. 2-1-1 has the potential to go further in bridging the gap between the utility companies that want to provide assistance and those who need it.

C. 211 has Worked With Utility Companies

Duquesne Light Company and Peoples Natural Gas have demonstrated their support of 2-1-1 and the benefit of an easy to remember three-digit number by providing significant financial support to 2-1-1.

The staff at 2-1-1 and the Universal Services staff at Duquesne Light and Peoples have worked together to provide assistance with keeping service on, replacing furnaces, providing weatherization services and more using a patchwork of utility and private sector dollars. The synergy between these organizations have led to better outcomes for the most vulnerable customers. PA 2-1-1 Southwest has been able to expand its services because of the investment by Duquesne Light and Peoples Natural Gas and deeply appreciates the support.

D. 211 Can Help Utility Companies Even More in the Future

A strengthened partnership between PA 2-1-1 and the PUC would aim to reach and assist customers who are struggling financially to achieve the following outcomes:

- Increase the number of low-income individuals who know about utility assistance and alternative resources.

- Increase utility customers' use of alternative resources (such as income assistance, housing, and food stamps), so that they can begin reducing their utility debts and meet the terms of their current payment agreements.
- Increase the number of pre-screened referrals to utilities' customer service centers and ensure that the people are prepared with the information they need to effectively connect with the utility provider.
- Screen people contacting 2-1-1 to assess their eligibility for Universal Service Programs.
- Text those in the 2-1-1 client database who are potentially eligible for utility services, and have given permission for texts, to educate them about services that can benefit their family.
- Text those in the utility company database identified as being without service to encourage them to call 2-1-1 to learn about assistance available.
- 2-1-1 is also positioned to warm transfer individuals directly to utility companies. We believe this service would allow a seamless interface designed to maximize the opportunity for customers to engage with the utility company while they are in a problem-solving mindset.
- Prevent duplication by tracking individuals across systems, and increase the efficiency of the Universal Service programs.

Moving forward, 2-1-1 can also help utility companies by:

- **Reducing barriers to enrollment through a one-stop-shop, regional approach.**
 - For those contacting 2-1-1 for utility assistance that have another pressing need, the most common additional need is another utility bill. A customer eligible for assistance with an electric bill would also likely qualify for assistance with the gas bill. One contact to 2-1-1 would streamline the process to connecting to assistance by assisting the individual with completing the pre-screening process and potentially completing a universal application.
 - The recent growth of 2-1-1, including technological advances, demonstrates 2-1-1's ability to adapt to the changing environment. 2-1-1 is poised to offer an approach to utility assistance enrollment that can range from pre-screening applicants to offering full enrollment in services. This approach would continue to build upon the public, private, and nonprofit partnerships 2-1-1 has developed across the state.
- **Reducing the “drop off” of people enrolled in utility assistance programs**

- 2-1-1 has the ability to leverage the convening power of the United Way to bring together community leaders and agency partners to identify the factors that contribute to people enrolled in utility programs not maintaining their enrollment. Beyond identifying factors, however, the United Way is committed to developing strategies to address barriers.
- United Way's support of 2-1-1 and trusted reputation positions 2-1-1 as a place to turn when people enrolled in utility assistance programs face a barrier to maintaining their enrollment that they might be unwilling to share with the utility company. 2-1-1 Resource Navigators seek to find the reason for the barrier or hardship. Addressing these underlying issues could reduce barriers to maintaining enrollment.
- 2-1-1 offers follow up in several regions. 2-1-1 is positioned to go beyond the intake or application to follow-up on those who used 2-1-1 to enroll in utility assistance.
- **Helping utility companies provide their customers with a place to turn for help with needs the utility company is not positioned or missioned to address.**
 - 2-1-1 provides a place for utility companies to turn in order to connect their customers to additional services to help sustain the family.
 - 2-1-1, powered by the United Way, is uniquely positioned to develop partnerships among human service providers that would connect people to multiple services in a seamless manner.

2-1-1's proven experience, easy-to-remember number, established community partnerships, and comprehensive human service information and referral resources makes 2-1-1 uniquely qualified to be the holistic center for utility assistance. 2-1-1's strength in a partnership with the utility companies is its ability to address holistically the human service needs of people in PA.

E. CONCLUSION

United Way and PA 2-1-1 respectfully request that utilities be permitted to invest a portion of their universal service dollars to 2-1-1 services. Specifically, we suggest that 5% of a utility's universal service dollars be directed for use by 2-1-1 to support the work they do with utility customers. As previously stated, utility needs are always a top need of our customers. The investment by Duquesne Light and Peoples Natural Gas has allowed PA 2-1-1 Southwest to expand its services to text and chat and to invest in quality assurance programs. With similar investments statewide, PA 2-1-1 is poised to provide a full suite of services to our customers and to utility customers.

United Way appreciates the opportunity to share its thoughts in these Initial Comments and looks forward to continuing to work with the Commission and other stakeholders to further evaluate to the USECP model and low-income assistance programs.

Respectfully submitted,

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