

VIA EFILE

June 7, 2023

Rosemary Chiavetta, Secretary
Pennsylvania Public Utility Commission
400 North Street
Keystone Bldg.
Harrisburg, PA 17105

**RE: 2023 Review of All Jurisdictional Fixed Utilities' Universal Service Programs
Docket No. M-2023-3038944**

Dear Secretary Chiavetta,

We, the undersigned public officials, agencies, organizations, and associations from across the Commonwealth of Pennsylvania, submit the following comments in response to the Public Utility Commission's request for input regarding Pennsylvania's universal service programs. We urge the Commission to pursue critical reforms necessary to improve the accessibility, coordination, and reach of critical electric, gas, water, and wastewater assistance and efficiency programs.

Basic utility services are increasingly out of reach for low income consumers, especially among low income consumers of color, who are disproportionately burdened by high home energy and water costs. While median income households spend between 3-4% of their income on home energy bills, low income households regularly spend upwards of 10-30% of their income on home energy bills. Notably, Black and Latino households spend disproportionately more of their household incomes on energy bills than white households. Multifamily households, renters, and older adult households likewise spend more on their energy bills and face higher energy burdens than the median household.ⁱ

These compounding inequities, coupled with a multi-year pandemic and rapid economic inflation, have only grown deeper and more pronounced. According to the U.S. Census Bureau's Household Pulse Survey, between March 2022 and March 2023, there was a marked increase in low and medium income households and households with children who reported 1) foregoing basic household necessities, such as food or medicine, in order to pay an energy bill and 2) keeping their homes at a temperature that felt unsafe or unhealthy in order to save money on their energy bills at least once in the past year.ⁱⁱ In 2022, according to data compiled by the Commission's Bureau of Consumer Services, more than 320,000 households experienced an involuntary shutoff of their gas, electric, or water service across the state.

Most of Pennsylvania's largest electric, gas, and water utilities offer universal service programs, with the goal of ensuring low income households can maintain safe, stable services to their homes. However, the current patchwork of programs, each with varied benefits, eligibility, and enrollment procedures, can be difficult to navigate – resulting in consistently low enrollment rates across the Commonwealth despite overwhelming need. As it stands, Customer Assistance Programs are reaching just over 20% of the estimated eligible population.

To help improve the accessibility and reach of utility assistance programs, the undersigned advocates urge the Commission to improve its oversight of utilities' Universal Services Programs in the following ways:

- **Create a centralized, common application process that allows low income consumers to enroll in all available utility assistance programs in one place.**
- **Streamline universal services program enrollment, eligibility, notices, and procedures to expand consistency across the state.**
- **Develop data sharing procedures, with robust consent requirements, to facilitate cross-program enrollment across utility companies and other federal, state, and local utility programs.**
- **Eliminate burdensome paperwork requirements through the expanded use of categorical eligibility for utility assistance programs for households already enrolled in SNAP, TANF, LIHEAP, Lifeline, or other state or federal forms of assistance.**
- **Improve consumer education and outreach initiatives in underserved communities, particularly in areas of high concentrated poverty.**
- **Expand language access policies to improve service for individuals with limited English proficiency.**
- **Ensure that water and wastewater utilities are held to the same universal service program standards and reporting requirements that apply to gas and electric utilities.**

Universal Services Programs are an essential tool that allow families to stay connected to life-sustaining electric, heat, and water services in their homes. Low income families are struggling profoundly to make ends meet in the face of rising costs and ongoing economic instability and inflation. It is critical for universal service programs to evolve accordingly to improve the accessibility and reach of these programs across the state.

Thank you for the opportunity to provide comments.

Respectfully Submitted,



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ⁱ See Drehobl, A., L. Ross, and R. Ayala. 2020. *How High Are Household Energy Burdens?* Washington, DC: American Council for an Energy-Efficient Economy; see also U.S. Energy Information Administration, 2020 Residential Energy Consumption Survey (RECS), *available at* <https://www.eia.gov/consumption/residential/>.

ⁱⁱ National Energy Assistance Directors' Association End of Winter Energy Update, <https://neada.org/wp-content/uploads/2023/04/eowapril2023.pdf>