

CITY OF PHILADELPHIA

Office of the Mayor
215 City Hall
Philadelphia, PA 19107
(215) 686-2181
FAX (215) 686-2180

JAMES F. KENNEY
Mayor

June 7, 2023

Pennsylvania Public Utility Commission
Commonwealth Keystone Building, 2nd Fl.
400 North Street
Harrisburg, PA 17120

Submitted via e-file

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

Dear Pennsylvania Public Utility Commission:

I am writing in support of the Pennsylvania Public Utility Commission's ("PUC") "2023 Review of All Jurisdictional Fixed Utilities' Universal Service Programs." Utility service is essential to public health, management of health conditions, and participation in daily economic and social life. "Energy insecurity," the inability to meet basic household energy needs, has been associated with poor respiratory health, mental health, and sleep, and may contribute to health disparities burdening disadvantaged communities.¹ Children who experience energy insecurity are more likely to experience food insecurity, hospitalization, and developmental issues.²

Many utilities offer Customer Assistance Programs ("CAPs") to help customers afford their bills, but these programs are often under-enrolled; for example, in 2021, only 14% of eligible Philadelphians were enrolled in PECO's CAP.³ Improvements to the administration of CAPs, expanded data sharing, and strategic outreach can improve CAP

¹ Hernández, D., & Siegel, E. (2019), "Energy insecurity and its ill health effects: A community perspective on the energy-health nexus in New York City," *Energy Research & Social Science*, 47, 78–83, <https://doi.org/10.1016/j.erss.2018.08.011>.

² Cook, J. T., et al. (2008), "A Brief Indicator of Household Energy Security: Associations with Food Security, Child Health, and Child Development in U.S. Infants and Toddlers," *Pediatrics*, 122(4), <https://doi.org/10.1542/peds.2008-0286>.

³ "PECO has millions available to help with energy bills, but says few eligible customers are applying for assistance" (June 29, 2021), <https://www.phillyvoice.com/peco-utility-assistance-emergency-rental-assistance-program-philadelphia-pennsylvania/>.

enrollment, economic stability, and public health in Pennsylvania. Below I list recommendations that my administration believes will move us toward these goals, some of which we have implemented for customers of the Philadelphia Water Department (“PWD”).

Recommendations

Expand data sharing to benefit Pennsylvanians. Expanded data sharing among utilities, local governments, and the Commonwealth would allow for more effective and efficient auto-enrollment and outreach efforts for CAPs. For example, the City of Philadelphia is partnering with the Commonwealth to use LIHWAP data to enroll customers in one of PWD’s CAPs. Data sharing can and must be done legally and ethically, and uses should be expressly limited to those benefiting the customer.

Request customer consent to share data for other government benefits. Offering customers the ability to consent to share data with other government benefit programs they may also be eligible for can save staff and customer time and connect people to benefits they otherwise would miss.

Simplify applications and reduce documentation required. Consistent with human-centered design principles, CAPs should have simple, intuitive forms with language that is easy to understand, available in translation, and vetted by customers and other stakeholders. Documentation requirements, which can be difficult or impossible for some households to meet, should be minimal, and where possible self-attestation should be used.

Ensure numerous application methods are available. Customers benefit from being able to apply for CAPs online, by phone, by mail, and in-person, in each case with translation services available. PUC could also work with the PA Department of Human Services to have CAPs added to PA COMPASS. Pennsylvania may be able to move toward a more integrated application process like Michigan’s “MI Bridges” program, allowing for simultaneous application to different types of programs.

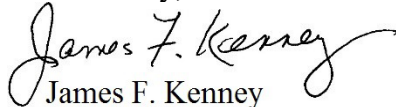
Implement a common application. A common application with one intake process could greatly ease the administrative burden on utility staff and customers, while allowing for substantive differences in eligibility criteria and other regulatory requirements responsive to local and regional conditions.

Require recertification less frequently. PWD successfully transitioned from an annual recertification requirement to a 3-year recertification cycle, reducing administrative burden on the agency and customers.

Conduct multi-modal outreach campaigns. Effective outreach meets people where they are and creates opportunities to share information in both directions: utilities can inform customers about CAPs, payment plans, and other ways to manage their bills, and customers can provide information utilities need to enroll them in CAPs or otherwise provide services effectively. PWD has successfully engaged in outreach via calls, texts, emails, and door knocking.

My administration supports the services review PUC is conducting, and we look forward to learning about the policy and operational changes that may result. We are confident that implementation of the recommendations above would help to connect more Pennsylvanians to the benefits for which they are eligible, thereby improving economic stability and public health in Pennsylvania.

Sincerely,

A handwritten signature in cursive script that reads "James F. Kenney". The signature is written in black ink and is positioned above the printed name and title.

James F. Kenney
Mayor