

June 7, 2023

VIA ELECTRONIC FILING

Rosemary Chiavetta, Secretary
Pennsylvania Public Utility Commission
Commonwealth Keystone Building, 2nd Floor
400 North Street
Harrisburg, PA 17120

Re: 2023 Review of All Jurisdictional Fixed Utilities' Universal Service Programs (M-2023-3038944)

Dear Secretary Chiavetta:

Opower appreciates the opportunity to provide comments on improving coordination, enrollment, and retainment in the universal service programs. A division of Oracle, [Opower](#) brings AI and behavioral science into the utility customer experience to influence action at scale. As a registered Conservation Service Provider implementing behavioral energy efficiency programs under Act 129, we are keenly aware of many of the barriers and opportunities to reaching and engaging customers of all kinds, especially those who are energy burdened, in Pennsylvania.

Our solutions have now expanded beyond just energy efficiency to include [energy equity and affordability](#). We have engaged in extensive research and testing to improve our understanding of the needs of low and moderate income customers, and to determine the best ways to identify, reach, and enroll them in assistance programs. Based on our research and extensive experience with utility customer engagement, Opower respectfully submits the following responses to a selection of the questions in the Commission's request for information.

4. Is an automatic enrollment program feasible where any mechanism through which an electronic exchange of information between a utility and a state social service agency confirms the eligibility of public benefits whether or not the information is expressly authorized by the household? If express authorization is needed, rather than automatic

enrollment, can that express authorization be provided one time in a uniform application rather than on a utility-by-utility basis using separate applications?

Yes and. increased data sharing between utilities and state agencies can enhance the ability to find and reach customers who may be in need and not already receiving certain benefits or within a specific geography. The utilities have an established relationship with their customers and have data that can help identify customers as likely to be eligible for both utility programs and state social service agencies. For example, [Opower layers multiple data sets](#) from the utility, government sources, state agencies and others to develop affordability metrics and can generate an energy burden score for each customer. When tested against a census tract-based income approach, we found we were able to identify many more customers who were eligible for assistance – analysis of New York utility customers found that energy burdened customers could be found in almost every census tract, not just in those designated as low income. This kind of analysis can be used in tandem with other efforts such as geographic targeting and self-attestation to reach a wider group of customers who may benefit from bill assistance and automatic enrollment.

With a [platform like Opower](#), utilities can securely and responsibly share customer attributes and eligibility among state agencies and other partners within the ecosystem of those serving limited income customers.

6. What changes would be required to EDCs' and NGDCs' existing, Commission approved universal service and energy conservation programs to incorporate improvements and could changes be addressed in a streamlined fashion?

Coordination between existing utility programs is critical to serving customers in need with a standard approach. Different programs at a utility, including CAP, LIURP programs, energy efficiency, rates, and state administered programs like LIHEAP often serve the same customer without having standard customer attributes across the utility. Including provisions that require more standardization between these programs can help identify and reach customers in need. For example, using well established energy efficiency programs under Act 129 to help get customers into bill assistance programs, not just low income EE programs, could capture additional customers who may be aware of EE offerings, but not assistance programs. Customers who may benefit from CAP need bill assistance first, before they can think about energy efficiency. Once customers are better able to pay their bills, coordination between

programs can ensure they are automatically funneled towards low income EE programs. The Commission may also consider allowing for the use of DSM ratepayer funds to support utility investment in solutions that connect customers with assistance programs as a means to build the pipeline for low income energy efficiency programs.

7. What additional consumer education and outreach could be undertaken to make more low income consumers aware of the benefits that may be available to them?

As noted in the CAP policy statement, the CAP programs are not reaching everyone who is eligible, and increased customer education and outreach is critical to closing this gap. There are three critical steps to removing barriers for customers to participate.

The first is **identifying** customers. Being able to find vulnerable customers is the first step to increasing enrollment. In many cases, energy burdened customers are not aware of programs that may benefit them because the utility does not know who they are. Bill assistance, energy efficiency, and other programs are often administered in silos, at least partially due to regulatory frameworks, with different programs targeting the same customer. A customer looking for assistance may start that journey via CAP, LIHEAP, energy efficiency, rate plans, or other offerings. Promoting more collaborative use of customer information within the utility can help break down barriers between programs. As indicated in the response to question 4, responsible and secure data sharing between utilities and state agencies can also enhance the ability to identify customers in need. For example, one Northeast utility was able to identify 78% more limited-income customers leveraging Opower's data and analytics relative to the utility's existing approach. Read more about Opower's approach to using data to identify customers here: https://docs.oracle.com/en/industries/energy-water/affordability-cloud-services/affordability-identification-overview/Customer_Experience/Affordability-Identification-Analytics.htm

Opower recommends:

- Allowing utilities to make use of enhanced data and analytics to identify which customers may be in need
- Enabling responsible and secure data sharing among utilities and between utilities and state agencies to give all parties a better view of who is in need

Second, utilities must be able to effectively **reach** low income customers with information that is applicable to them. Our research found that qualified customers are often unaware of available income-qualified programs, and customer sentiment is typically low because their communications from their utilities often focus on topics like late fees or service disconnection. Customers already know they are behind on their bills, but they don't always know that the utility has ways to help them. Using the right channels is also critical to reaching customers. For example, our research showed that vulnerable customers tend to have high levels of mobile phone usership, but less access to computers. Our research also showed that there are distinct "moments that matter" when customers are struggling to pay bills, including the opening of LIHEAP applications and seasonal changes. Proactively reaching out to customers at these moments, *before* a crisis point, is key, and using personalized messaging drives measurable results. Opower worked with a Northeast utility to send energy usage and billing alerts to limited-income customers, which were shown to generate a 27% increase in awareness of the utility's customer programs. Learn more about Opower's approach to reaching vulnerable customers here: <https://docs.oracle.com/en/industries/energy-water/affordability-cloud-services/affordability-proactive-alerts-overview/Home-Affordability-Proactive-Alerts-Overview.htm>

Opower recommends:

- Utility customer engagement plans should focus on positive, engaging, and proactive communications that are as personalized to each customer as possible.
- The Commission should encourage customer engagement plans that include *proactive* outreach to customers at important moments before crisis sets in, with the right kind of communication, and providing a mobile-optimized experience.
- The CAP policy statement should reflect these guiding principles for customer engagement plans.

Finally, utilities must be able to actually **enroll** customers in the CAP program once they've been identified and reached. With the wide variety of programs available, including CAP, LIHEAP, energy efficiency programs, and others (and the varying eligibility requirements for each) customers are often confused about which programs they qualify for and don't have all the information they need to make a decision about which programs are right for them. Vulnerable customers are also often unable to spend the amount of time required to sift through program options and eligibility requirements; a customer may be aware and engaged, but needs help to start the enrollment process. Standardizing enrollment among the various

utilities and within the utilities themselves can improve enrollment and deliver help to more customers. For example, at a west coast utility, Opower communications enabled a +13% increase in discount rate adoption among newly-eligible customers and an +11% increase in discount rate adoption among previous non-responders. Learn more about Opower's approach to streamlined enrollment here:

https://docs.oracle.com/en/industries/energy-water/affordability-cloud-services/affordability-savings-hub-overview/Home_SavingsHub.htm

Opower recommends:

- Creating a one stop shop that shows customers all the programs they are eligible for, including CAP, LIHEAP, energy efficiency, and others.
- Creating a common application for these programs that streamlines the process for the customer by enabling one initial application for multiple programs.

Thank you for the opportunity to weigh in on this important matter and appreciate the Commission's consideration of Opower's comments. Please do not hesitate to contact me with any questions at carolyn.sloan@oracle.com.

Sincerely,



Carolyn Sloan
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Opower/Oracle