

Public Service Commission of Wisconsin

Rebecca Cameron Valcq, Chairperson
Ellen Nowak, Commissioner
Tyler Huebner, Commissioner

4822 Madison Yards Way
P.O. Box 7854
Madison, WI 53707-7854

March 10, 2021

VIA ELECTRONIC RECORDS FILING SYSTEM

To all utilities:

Re: Investigation on the Commission's Own Motion to Ensure
Safe, Reliable and Affordable Access to Utility Services
During Declared Public Health Emergency for COVID-19

5-UI-120

Comments Due:

Friday, April 2, 2021 - 1:30pm

This docket uses the Electronic Records Filing
system (ERF).

Address Comments To:

**Steffany Powell Coker, Secretary to
The Commission**

Public Service Commission

P.O. Box 7854

Madison, WI 53707-7854

The Commission memorandum concerning the Investigation on the Commission's Own Motion to Ensure Safe, Reliable and Affordable Access to Utility Services During Declared Public Health Emergency for COVID-19 is being provided to utilities and other stakeholders for comment. Comments must be received by 1:30 pm on Friday, April 2, 2021. Comments must be filed using the Commission's ERF system. The ERF system can be accessed through the Public Service Commission's web site at <http://psc.wi.gov>.

The Commission is investigating activities that are required to ensure safe, reliable and affordable access for all customers to electric, gas, water, and steam services during the declared public health emergency for COVID-19.

DOCUMENTS. All documents in this docket are filed on the Commission's Electronic Records Filing (ERF) system. To view these documents: (1) go to the Commission's E-Services Portal at <https://apps.psc.wi.gov>, (2) enter "5-UI-120" in the box labeled "Quick Single Docket Search and (3) select "Documents." To receive electronic notifications when new documents are filed in this docket, go to ERF - [EZ Subscriptions](#) and follow the instructions to subscribe to this docket.

Any utility, organization, or interest group shall file one comment using the Commission's Electronic Regulatory Filing (ERF) system, and are not precluded from filing comments by the fact that they have filed comments in this docket prior to the date of this notice.

To file such a comment, go to the Commission's E-Services Portal at <http://apps.psc.wi.gov>, and click on the "ERF Upload Documents" link on the left side menu bar. On the next page, log on if you are a registered ERF user, create a new account if you do not have an existing account, or contact PSC Records Management staff at (608) 261-8521 or via e-mail at PSCRecordsMail@wisconsin.gov for assistance.

AMERICANS WITH DISABILITIES ACT. The Commission does not discriminate on the basis of disability in the provision of programs, services, or employment. Any person with a disability who needs accommodations to participate in this docket or who needs to obtain this document in a different format should contact the docket coordinator listed below.

CONTACT. Please direct questions about this docket or requests for additional accommodations for the disabled to the Commission's docket coordinator, Laura Fay at (608) 267-0913 or Laura.Fay@wisconsin.gov.

Sincerely,

A handwritten signature in black ink that reads "Kristy Nieto". The signature is written in a cursive, flowing style with a long horizontal stroke at the end.

Kristy Nieto
Administrator
Division of Digital Access, Consumer and Environmental Affairs

KN:LF:kle DL:01788662

Attachments

PUBLIC SERVICE COMMISSION OF WISCONSIN

Memorandum

March 10, 2021

FOR COMMISSION AGENDA

TO: The Commission

FROM: Kristy Nieto, Administrator
Tara Pray, Deputy Administrator
Bradley Rose, Bureau Director
Laura Fay, Consumer Analyst
Division of Digital Access, Consumer and Environmental Affairs

Martin Day, Administrator
Division of Energy Regulation and Analysis

Denise Schmidt, Administrator
Division of Water Regulation and Analysis

RE: Investigation on the Commission's Own Motion to Ensure Safe, Reliable and Affordable Access to Utility Services During Declared Public Health Emergency for COVID-19 5-UI-120

Utility Arrearage Management Plan Filings

Suggested Minute: The Commission reviewed information related to Arrearage Management Plans submitted by utilities and (took/did not take) action consistent with its discussion.

Background

In response to Governor Evers' declaration of a public health emergency due to COVID-19, on March 24, 2020, the Public Service Commission of Wisconsin (Commission) issued an Order temporarily altering the tariffs of all Wisconsin public utilities until further order of the Commission. ([PSC REF#: 386373.](#)) The Commission prohibited all utilities from disconnecting or refusing service due to nonpayment until further order of the Commission. The

Commission issued the Order to prevent injury to the business and interests of the people and the public utilities of the state, pursuant to the Commission’s authority under Wis. Stat. §§ 196.02(1) and 196.70, and Wis. Admin. Code §§ PSC 113.01(2), PSC 134.01(2), and PSC 185.11(4).

Since the issuance of the original Order on March 24, 2020, the Commission has continued to monitor the ever-evolving nature of the COVID-19 pandemic to ensure the health and safety of all Wisconsin residents. At subsequent open meeting discussions, the Commission reviewed disconnection plans and available data related to economic and public health concerns facing customers and utilities. Based on the information available at the time, the Commission determined the risk posed to residential customers and their communities in permitting disconnection and refusal of customer access to the services needed to abide by hygiene standards and “social distancing” guidelines would be of such a serious nature that prohibiting disconnection would continue to be necessary to prevent injury to the interests of the people. In addition to prohibiting disconnection for nonpayment, the Commission directed staff to have discussions with electric, gas, and water public utilities related to arrearage management planning.

In its September 29, 2020, Supplemental Order on Residential Disconnection – Second, the Commission ordered all utilities to submit a comprehensive plan to the Commission proposing how to address the financial impacts of arrears (arrearage management plan, or AMP) by January 15, 2021. ([PSC REF#: 397476.](#))

At its open meeting of October 22, 2020, the Commission found that allowing utilities to disconnect residential service for nonpayment beginning November 1, 2020 would not be just and reasonable.¹ In its October 29, 2020, Supplemental Order on Residential Disconnection –

¹ While the winter moratorium on disconnection and refusal of residential heating service begins annually on November 1 pursuant to Wis. Admin. Code §§ PSC 113.0304, 134.0624, and 185.37, non-heating service normally

Third, the Commission stayed until April 15, 2021, the date on which a utility's authorization to disconnect or refuse residential service for nonpayment takes effect.² ([PSC REF#: 399114](#)). The Commission further ordered that any utility seeking to disconnect residential service after April 15, 2021, shall, prior to disconnection, file a disconnection plan with the Commission by February 15, 2021. The Commission ordered that all electric, gas, and water public utilities continue to submit quarterly reports on arrears and collection information, including information regarding the utility's plans for communicating with customers about collections and arrears management, and the financial impacts of the utility's arrears. The Commission found it reasonable to allow utilities to elect to continue to waive late fees in a non-discriminatory manner until April 15, 2021, provided the utility file notification with the Commission. Utility disconnection plan and quarterly report filings are addressed in Commission staff's Disconnection Plans Fifth Memorandum. ([PSC REF#: 406149](#).)

State Comparison

In an effort to contextualize and glean best practices from utility AMPs, Commission staff compiled a comparison of several key efforts by utilities, Commissions, and like entities to mitigate the impacts of COVID-19 on customers and utilities through programs and policies in various states. Commission staff narrowed its listing to the Midwest region³, in order to look at states in close geographic proximity and with similar weather patterns. Commission staff also identified some notable programs and policies in states outside the Midwest that have taken a

may continue to be subject to disconnection as provided in Wis. Admin. Code §§ PSC 113.0301 ,134.062, and 185.37.

² Commissioner Nowak dissented.

³ The Midwest, as defined by the federal government, comprises the states of Illinois, Indiana, Iowa, Kansas, Michigan, Minnesota, Missouri, Nebraska, North Dakota, Ohio, South Dakota, and Wisconsin.

<https://www.bls.gov/regions/midwest/midwest.htm>

unique approach to assisting impacted customers and ensuring access to utility service during the pandemic. This review is attached to the memorandum as Appendix A.

Utility Customer Assistance, Collections Policy, and AMPs

Commission staff has continued to work with utilities to discuss planning related to the methods, programs, and procedures utilities might provide, pilot, or otherwise enhance in order to assist customers in light of the extraordinary challenges posed to customers by the COVID-19 pandemic and associated economic, health, and social conditions. Commission staff has held meetings regarding arrearage management planning with the IOUs on an individual basis, and the Municipal Electric Utilities of Wisconsin (MEUW) and participated in a question and answer session for municipal water utilities hosted by the Wisconsin Section of the American Water Works Association's (WIAWWA) to discuss arrearage management strategies for municipal utilities.

In its September 29, 2020 Supplemental Order on Residential Disconnection – Second, ([PSC REF#: 397476](#)) the Commission ordered all utilities to submit a comprehensive AMP to the Commission by January 15, 2021, detailing how the utility proposes to address the financial impacts of arrears – both to individual customers and to the utility and its customers as a whole. Commission staff provided a format to streamline the submittal of comprehensive AMPs to the Commission by all utilities. AMPs are intended to be an informational filing detailing how the utility proposes to address the financial impacts of arrears, including through utility customer assistance, collections policy, and other individual and utility-wide arrearage management strategies. Any undertaking proposed in an AMP that would normally require Commission approval, such as a tariff amendment, or the implementation of a new pilot program, would continue to require such approval outside of the AMP filing prior to implementation.

By January 15, 2021, 374⁴ utilities submitted an AMP to the Commission. Of the 374 utilities that provided plans, 227 utilities reported experiencing increased residual arrears in terms of total arrears dollars or arrears as a percentage of revenue as compared to previous years. Attached Appendix B summarizes the strategies utilities already use or intend to use to assist customers with increased arrears. Appendix C ([PSC REF#: 406396](#)) provides the full text of each utility's AMP filing.

The most common response provided by utilities regarding an overall plan to manage or address arrears dollars so they do not become “socialized” and eventually contribute to a rate increase, was through offering deferred payment agreements (DPAs) to customers. For municipal water utilities and some municipal electric utilities with an authorizing ordinance, collecting arrears as a special charge on the property taxes of the property furnished with the service using the tax roll process was another commonly proposed method for managing the financial impact of arrears.⁵ Of the 374 utilities that responded to the survey, 341 reported the intention to use the municipal tax roll process to collect customer arrears in 2021. While many utilities reported working with customers by offering flexible DPAs and encouraging customers to seek Energy Assistance (EA) to manage the overall arrears dollars, a number of utilities reported plans to manage or address arrears by proceeding with disconnecting delinquent accounts once the moratorium is lifted. A relatively small number of utilities reported plans to seek a rate increase to address or manage the total arrears dollars.

Regarding DPAs, many utilities reported offering increased flexibility in establishing DPA terms. The majority of utilities reported offering a reduction or elimination of the down

⁴ 315 individual utilities responded to the survey; however, 374 represents the total responses based on multiple service types.

⁵ See Wis. Stat. § 66.0809 for the tax roll collection requirements for municipal utility arrearages.

payment, and extended repayment installment terms as part of an effort to help customers reduce existing arrears and prevent disconnection. Several municipal utilities reported plans to seek a temporary tariff provision waiver to allow residential tenants the opportunity to establish a DPA.⁶ ([PSC REF#: 406396](#)) Many of these utilities have filed waiver requests on ERF. The handling and review of these individual requests is raised in Commission staff's Disconnection Plans Fifth Memorandum. ([PSC REF#: 406149](#).)

In coordination with the utilities' efforts to manage arrears through the use of DPAs, many utilities reported increased customer outreach efforts through personal contact, websites, social media posts, newsletters, and billing inserts to notify and educate customers about DPA opportunities, new utility options available, and EA funds.

Customer Outreach and EA Partnerships

In their AMP filings, many utilities reported primarily using web and social media posts to communicate new utility offerings to customers. Another commonly cited method used by the utilities to notify customers of new offerings is including inserts in the customer bills. As an example, New Holstein Public Utility ([PSC REF#: 406396](#)) reported using bill message, Facebook posts, website posts, and newspaper ads to promote customer participation in the "My Account" program which allows customers to sign up to review their accounts, access usage and billing information, participate in on-line bill receipts and manage their account payments. Madison Gas and Electric (MG&E) ([PSC REF#: 406396](#)) reported it will provide information and materials to business associations to share with their members and will utilize relationships

⁶ Pursuant to Wis. Stat. § 66.0809(9), municipal utilities are not required to offer a deferred payment agreement to a customer who is a tenant at a rental dwelling unit. From 2014 to 2017, 88 municipal electric, water, and natural gas utilities have filed tariff provisions restricting the circumstances in which a residential customer who is a tenant may be offered a DPA by the utility.

with business groups and associations to encourage commercial customers to contact and work with MG&E ([PSC REF#: 406396](#)).

Many utilities that reported collaboration efforts with EA agencies also highlighted efforts to make customers aware of the availability of EA programs and encourage customers to apply for assistance. Many of those utilities reported using the same methods to communicate EA options to customers as used to communicate new utility offerings. The majority of reported utility and EA agency partnerships consisted of providing contact information for local EA offices, conducting education and outreach about available assistance options, and providing some assistance with the application process. Sun Prairie Utilities ([PSC REF#: 406396](#)) directly allocated \$50,000 to local Sunshine Place, a nonprofit organization that cultivates community connections, to administer utility assistance funds to at-risk clients.⁷ MG&E ([PSC REF#: 406396](#)) reported that its partnership with Energy Services, Inc. (ESI) supports several EA programs and communicated an intention to strengthen its partnership with ESI and explore other potential partners to help additional customers in 2021.

DPA Options

Based on the survey responses received, the majority of utilities reported offering innovative DPA options with more flexible down payment amounts, extended repayment term options, and due date extensions. Many utilities report creating or negotiating more individualized payment agreements. For example, Westby Electric and Water Utility ([PSC REF#: 406396](#)) indicated it is considering creating more individualized payment plans that work for customers as individuals, as opposed to applying a set guideline to all customers.⁸

⁷ Utility indicates it was afforded funding through its power provider.

⁸ In cases in which a utility is required to offer a DPA to a residential customer, an electric, gas, or water public utility is required, pursuant to Wis. Admin. Code §§ PSC 113.0404, 134.063, 185.38, to consider the customer's circumstances when determining a reasonable down payment amount to request. Many utilities use 50 percent of the

Some utilities reported implementing or intending to implement more innovative payment related features, including: encouraging customers to pay online, encouraging credit card payment, and allowing higher maximum limits on credit card and automated clearing house (ACH) transactions.

Manitowoc Public Utilities (MPU) is offering a Minimum Payment Option (MPO) to residential customers (both owner and tenant occupied). The MPO allows a customer to pay a specified minimum payment amount and as long as the MPO payment is made in full, MPU will continue to offer the MPO on the account until arrears are cleared or until the August 2021 billing. ([PSC REF#: 406396](#))

Commission Alternatives – Customer Outreach and Energy Assistance (EA)

Partnerships and Payment Plans

Alternative One: The Commission directs Commission staff to work with utilities on implementing customer outreach strategies and innovative payment plans.

Alternative Two: Take no action at this time.

Other Customer Service and Collection Policy Strategies

Of utilities that reported making changes to collection efforts, policies, or practices as a strategy for managing arrears, the majority reported changes to DPA policies. Changes in the utilities' payment policies and DPAs provided customers with more opportunity to make payments or arrangements to avoid further collection activity on the account. The primary reported objective of utility changes to collection practices was to help customers avoid

outstanding bill as a starting point for the negotiation of a DPA, but are nonetheless required to consider the factors enumerated in these Wis. Admin. Code provisions in ultimately determining the “reasonableness” of an amount. In some cases in which a utility is offering a DPA outside of the circumstances required by the Admin. Code (e.g., to a nonresidential customer, a subsequent DPA following a default with no change in ability to pay), these requirements would not apply or should have been met in the prior, required DPA offer.

disconnection when authorized and remain current on their bills. MPU described its Winter Moratorium Collection program, which included customer service representatives directly calling customers who are in danger of a Winter Moratorium Nonpayment (WMNP) deposit.⁹ The customer service representatives followed up with a letter that provided a listing of billing used for calculation of the deposit, a copy of the “Customer Bill of Rights,”¹⁰ and an EA brochure. MPU indicates these changes will give the customer an opportunity to make payment or arrangements to avoid the deposit. MPU reviews accounts are 30 days later for payment. If no payment is made, a WMNP deposit is assessed to the account, a call is made, and a letter is sent. ([PSC REF#: 406396](#))

Of the 374 utilities that submitted an AMP, 11 utilities reported intentions to submit a new arrearage forgiveness program filing or other tariff change for Commission approval and 60 utilities are still evaluating the possibility of submitting a new arrearage forgiveness program or other tariff change for Commission approval. As noted previously in this memorandum, several municipal utilities are planning to request tariff provision waivers to temporarily loosen the more stringent rules regarding DPAs for residential tenants that those utilities have in place. Superior Water, Light and Power Company (SWL&P) ([PSC REF#: 406396](#)) plans to submit, by April 15, 2021, a new arrearage management or forgiveness program for Commission approval. The program would include SWL&P matching customer payments when the customer has made consistent payments. One potential concern and recommendation identified by staff relates to

⁹ Wisconsin Admin. Code §§ PSC 113.0402 and 134.061 permit a utility to assess a residential WMNP deposit if “[t]he customer has the ability to pay for the utility service but, during the cold weather disconnections rules period, had an arrears amount incurred during that period that was 80 days or more past due. The utility may request a deposit under this section even if the customer's service has not been disconnected.” Ability to pay is defined as above 200% of the federal income poverty guidelines. WMNP deposits can be of an amount up to “the highest actual gross bills for any 4 consecutive months within the preceding 12 months review period, as determined by the utility.”

¹⁰ See Wis. Admin. Code §§ PSC 113.0501(4), 134.05(4), and 185.22(4) relating to “Bill of Rights” requirements.

the time required to review a new program proposal of this nature. Depending on the quality and quantity of analysis a utility submits in its proposal, staff may have to obtain additional information, which adds time to the process. The extent to which a utility is able to provide more detailed information with the application may decrease in step the amount of time required for Commission staff to request further information to analyze cost-benefit and other projected customer impacts for the Commission to review in its decision making process. While it may be beneficial for a new, innovative customer payment program to be available as soon as possible, especially in light of the circumstances impacting customers as a result of the pandemic, the Commission will need adequate information to determine the effects of the program. The Commission could consider directing staff to work with any utility planning to submit a new program for Commission approval, to obtain all necessary information submitted with the application and to work with the utility on analyses needed for the Commission to take up the matter. This could result in an expedited process leading to faster implementation.

Regarding requests to waive tariff provisions, as mentioned previously, options for expedited review of these requests are provided to the Commission in Commission staff's Disconnection Plans Fifth Memorandum. ([PSC REF#: 406149.](#))

Commission Alternatives – Other Customer & Collection Strategies

Alternative One: The Commission directs Commission staff to develop an expedited process to assist utilities with applying to the Commission for tariff change requests related to new arrearage management or forgiveness programs.

Alternative Two: Take no action at this time.

Investor Owned Utilities (IOUs)

The IOUs reported using many of the same strategies used by the municipal utilities to manage arrears. However, in addition to the more common arrears management strategies, Wisconsin Electric Power Company (We Energies), Northern States Power Company (Xcel Energy), MG&E, Wisconsin Public Service Corporation (WPS), and now Wisconsin Power and Light (WPL) have existing programs that provide arrears forgiveness for low-income customers in tandem with completion of a DPA. We Energies and WPS, both part of the WEC Energy Group, reported considering increasing the number of low-income customers who are eligible to participate in their respective low-income forgiveness plans.

MG&E is exploring ways to expand the utility's existing partnership with Madison-based nonprofit ESI, and other potential partnerships to help additional customers in 2021. MG&E is also evaluating other programs with benefits similar to debt forgiveness and is considering the possibility of an arrears forgiveness program. In addition to exploring ways to expand its existing arrears forgiveness program, MG&E intends to request Commission approval in early 2021 to apply customer deposits held by MG&E toward their individual delinquent account balances. ([PSC REF#: 406396](#))

WP&L recently took measures to manage arrears by applying for approval of an AMP in fall of 2020. The Commission approved a one-year AMP pilot to assist low-income customers in arrears. WP&L will provide outcomes to the Commission after one year of implementing to determine whether modifications to the program are needed. ([PSC REF#: 402134.](#))

To address increased arrears, IOUs indicated they will seek to resume residential disconnections or address recoverability and allocation of deferred costs through a rate proceeding.

Municipal Utilities

Based on the survey responses, the municipal utilities plan to manage or address increased residential arrears so that they do not become “socialized,” and contribute to a rate increase for a particular class or classes of customers, by using DPAs and the tax roll process. Although the majority of municipal utilities are focusing on ways to make it easier for customers to pay their bills, the use of the tax roll process was the most common tool cited by the municipal utilities for managing the financial impact of customer arrears. Another method commonly reported by municipal utilities to manage customer arrears is use of the state debt collections through the tax refund intercept program (TRIP). While the majority of municipal utilities reported efforts to work with customers to manage arrears, some municipalities reported the intention to use disconnections as the primary tool to manage arrears.

Commission Alternatives – Other Discussion

Alternative One: Take no action at this time and address additional concerns regarding the financial impacts of arrears in the utility’s next rate case proceeding.

Alternative Two: Direct utilities to work with Commission staff to evaluate the ongoing impact of customer arrears on utility finances and submit additional information regarding arrearage management.

KN:MD:DS:TP:BR:LF:pc:kle DL: 01782089

Key Background Documents

Appendix A: State Comparison Table DL: 1787866

Appendix B: Utility Strategy Summary DL 1787875

Appendix C: Utility Arrears Management Plans Summary DL: 1788166

Appendix A: Key Programs and Policies State Comparison Table

State	Arrearage Management Plans (AMP)	CARES/EA	Current Orders
California	<p>AMP by PG&E, SCE, SDG&E, and SoCal Gas:</p> <ul style="list-style-type: none"> ▪ Forgives past due arrearages for participants in return for on-time payment of current monthly bills. ▪ Utilities recover the costs of the forgiven arrearages through the Public Purpose Program Charge from all customers. ▪ Utilities will make remittance payments to Community Choice Aggregators (CCAs) for customers enrolled in AMP to compensate CCAs for the cost of forgiven arrearages by unbundled customers. ▪ Once the moratorium is lifted, IOUs required to offer 12-month payment plans. ▪ Reducing residential and business energy bills utilizing the California Climate Credit 	<p>Utilities to take steps to enroll more customers in CARE.</p> <ul style="list-style-type: none"> ▪ Ex) PG&E has enrolled 180,000 more customers into the CARE program since March 2020. 	<p>Suspension of disconnection until at least mid-April.</p> <p>Once moratorium is lifted-disconnection caps, declining permanent cap on the number of residential customers the IOUs can disconnect.</p> <ul style="list-style-type: none"> ▪ Ex) Cap starts at 4% of IOU's accounts and decreases to 3.5 percent by 2024. <p>Suspension of renewal requirements for low-income programs</p> <p>Elimination of deposits and reconnection fees</p>
Illinois	<p>Bill assistance programs and CAP</p> <p>Extended deferred payment arrangements (DPAs) 18-24 Months</p> <p>Programs vary by utility</p> <p>We Energies/WPS put \$12 million into fund for bill payment assistance through rate recovery. \$1 million charitable donation</p> <p>Tracking Costs</p>	<p>On June 15, 2020, Governor JB Pritzker and the Illinois Department of Commerce and Economic Opportunity (DCEO) announced \$275 million in funding for the Low-Income Home Energy Assistance Program (LIHEAP) and Community Services Block Grant (CSBG) programs. This funding includes an additional \$90 million allocated via the CARES Act, allowing the state to increase eligibility for these programs to 1 million income-qualified Illinoisans</p>	<p>All customers, regardless of financial situation, cannot be disconnected through March 31, 2021 to protect the public during the cold winter months.</p>

Appendix A: Key Programs and Policies State Comparison Table

State	Arrearage Management Plans (AMP)	CARES/EA	Current Orders
<p>Indiana</p>	<p>Indiana Michigan Power is introducing a Low Income Arrearage Forgiveness pilot program to help eligible Indiana customers manage their current energy bills and eliminate past-due debt. Over the next few months, Indiana customers who previously qualified for I&M's Energy Assistance Program (EAP), have an arrearage and meet other eligibility standards will receive a letter from Dollar Energy Fund.</p> <p>Indiana Michigan Power has partnered with Dollar Energy Fund to work with customers through the qualification process. The Low Income Arrearage Forgiveness pilot program was created because of discussions with Hoosier consumer advocates as part of I&M's Building the Future plan.</p> <ul style="list-style-type: none"> ▪ 6 month DPAs ▪ Tracking Costs via Regulatory Asset 	<p>Those who were approved for LIHEAP between Oct. 1, 2019 and July 31, 2020 could qualify for a one-time \$350 benefit. To be eligible, you must be approved for the program and be able to prove that a member of the household has experienced job loss or a decrease in hours because of the COVID-19 pandemic. The</p>	<p>Extended moratorium on utility service disconnections for 45 days beyond the expiration of Executive Order 20-28. Commission doubled minimum requirement (from the original order) for extended payment plans by requiring all jurisdictional utilities to offer payment plans of at least six months to all customers.</p>

Appendix A: Key Programs and Policies State Comparison Table

State	Arrearage Management Plans (AMP)	CARES/EA	Current Orders
Iowa	<p>Rate-regulated utilities will continue to file the additional information in their monthly reports until April 15, 2021.</p> <ul style="list-style-type: none"> ▪ 12 month DPA ▪ Tracking Costs via Regulatory Asset 	<p>Residential Utility Disruption Prevention Program provides eligible households with up to \$2,000 towards electric, natural gas and water bills if they are at risk of disconnection due to an inability to pay due to a COVID-19 related loss of income. Payments are made directly to the utility and applied to the applicant's account. Approximately \$14.5 million of federal CARES Act funds for utility assistance programs.</p>	<p>Iowa's winter moratorium law, customers who qualify for the Low-Income Home Energy Assistance Program (LIHEAP) or Weatherization Assistance Program are protected from the annual shutoff of natural gas or electric service from November 1 to April 1.</p>

Appendix A: Key Programs and Policies State Comparison Table

<p>Kansas</p>	<p>12 month DPAs</p> <p>Tracking Costs via Regulatory Asset</p>	<p>At the end of July, about 5,200 Lawrence households had past-due utility balances, amounting to \$1.35 million in delinquent payments,</p> <p>The city has been awarded \$500,000 for an assistance program to help customers with economic hardship due to COVID-19, according to the city’s funding application.</p> <p>The city plans to partner with a local social service agency to assess the degree of economic hardship and eligibility for those seeking to participate in the program.</p>	<p>Utilities are required to offer 12-month payment plans and waive late fees through the official end of the pandemic.</p>
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Appendix A: Key Programs and Policies State Comparison Table

State	Arrearage Management Plans (AMP)	CARES/EA	Current Orders
Minnesota	Development of a reporting structure to evaluate proposals submitted by the regulated utilities. Currently reviewing.	<p>In July, Governor Tim Walz announced plans to distribute \$100 million in housing assistance to Minnesotans who were at risk of losing their homes because of the economic crisis brought on by the COVID-19.</p> <p>More than 28,000 low-income households across the state have applied for relief under the federally funded program, which was designed to prevent evictions and homelessness among the growing number of people struggling to make ends meet because of COVID-19.</p> <p>The funds can be used to cover back-due rent, mortgage payments, utility bills and other housing-related expenses, provided the applicant's financial hardship was caused by the pandemic.</p>	<p>The Cold Weather Rule (CWR) protects and reconnects customer's heat from October 15 through April 15; all electric and natural gas companies are required to offer this protection.</p> <p>Rate regulated electric and natural gas utilities required to suspend disconnections, negative credit reporting, waive penalties, fees for reconnections and interest.</p> <p>Disconnection protection to continue for at least 60 days after the end of the peacetime state of emergency</p>

Appendix A: Key Programs and Policies State Comparison Table

State	Arrearage Management Plans (AMP)	CARES/EA	Current Orders
Missouri	<p>Spire Missouri will implement a new payment assistance program and 18-month DPAs</p> <p>COVID-19 AMP:</p> <ul style="list-style-type: none"> ▪ initial \$100 bill credit ▪ Up to \$300 of their arrearage matched by the program. ▪ \$1 million from Spire, up to \$1 million redirected from expired fiscal year 2020 Multi-Family Low Income energy efficiency programs (\$600,000) and from the Community Savers Single-Family Low-Income program (\$400,000). ▪ Ameren allocated more than \$4 million to assist vulnerable customers ▪ Eligible customers have paid 25% of their balances ▪ Missouri-American Water Company ▪ Enhanced installment plan 	<p>In June, \$15 million was added to LIHEAP to double the maximum benefit from \$300 to \$600</p> <p>Expanded eligibility and extended summer LIHEAP until October 31, 2020</p> <p>Increased income level to qualify for help with summer cooling bills</p> <p>Recently added the option to apply online for the LIHEAP</p> <p>As of August 31, 2020, \$8.5 million in summer cooling assistance to over 34,000 households.</p>	<p>Investor owned utilities voluntarily suspended disconnections and waived late payment fees and extended payment plans.</p> <p>Waivers of Service</p> <p>Reconnection Fees</p> <p>Waivers of meter testing requirements for gas</p> <p>Grants requests for a temporary waiver of compliance with certain natural gas safety rules and certain Commission orders pertaining to inspections and replacements.</p> <p>Staff to provide monthly reporting.</p>
Nebraska	NA	October 19, 2020 second round of Community CARES grant programs	<p>Temporary Ban on Natural Gas Disconnections.</p> <p>Voluntary / Utility-Specific</p>
North Dakota	Petition to Track Costs filed with the Commission	Emergency Commission approves additional \$406M in federal funds for COVID-19 response and recovery	Voluntary / Utility-Specific moratorium

Appendix A: Key Programs and Policies State Comparison Table

State	Arrearage Management Plans (AMP)	CARES/EA	Current Orders
Ohio	<p>Arrearage Crediting Program: Monthly crediting of 1/24th of pre-enrollment arrears if PIPP is made in full and on time, plus any difference between PIPP and actual usage charges is forgiven.</p>	<p>October 26, 2020 \$50 in CARES Act funding available for assistance.</p> <p>PIPP (Percentage of Income Payment Plan)</p> <p>Electric Partnership Program (EPP)</p>	<p>Extended winter reconnect order through May 1, 2020. The Winter Reconnect Order helps Ohioans reconnect or maintain electric and natural gas service during the heating season between Oct. 14, 2019 and May 1, 2020.</p> <p>Commission directs all public utilities under its jurisdiction to review their service disconnection policies, practices, and tariff provisions.</p> <ul style="list-style-type: none"> •Order directing Ohio's electric, natural gas, water & wastewater distribution utilities to suspend any in-person meter reading activities, and any other non-essential work that would create unnecessary social contact. •Governor signs House Bill 197, Requiring a public water system to restore service to any customer whose service was disconnected because of nonpayment of fees and charges. <p>Public Utilities Commission issued an order lifting previously ordered tolling of required time periods for the Commission to act upon a pending application or other filing, effective 06-01-2020.</p>

Appendix A: Key Programs and Policies State Comparison Table

State	Arrearage Management Plans (AMP)	CARES/EA	Current Orders
South Dakota	Tracking Costs via Regulatory Asset	<p>\$4,668,305 allocation of CARES</p> <p>•Uses of Funds: LIEAP is a program that provides financial assistance to low income South Dakota's households to pay their home heating bills.</p>	<p>Voluntary / Utility-Specific</p> <p>South Dakota PUC reminds consumers to utilize available resources during pandemic. In response to the pandemic, many of South Dakota's utility providers have announced policy changes including some companies' decisions to suspend disconnections for non-payment.</p>
Washington	<p>Long-term payment arrangements for up to 18 months for residential customers, and 12 months for small commercial customers.</p> <p>COVID-19 bill payment assistance program funded at 1% of their Washington state retail revenues Tracking Costs; Recovery Under Review.</p>	<p>\$500 in energy assistance for households that qualify for the (LIHEAP).</p>	<p>Moratorium on disconnections for nonpayment until April 30, 2021.</p> <p>Utilities will continue to waive deposits for new customers and all late fees through Oct. 27, 2021.</p>

References:

[PSC Approves Agreement Reached in Spire Missouri AAO Case | Missouri Public Service Commission \(mo.gov\)](#)

[What Missouri utility companies offer coronavirus, winter relief programs? \(themissouritimes.com\)](#)-utility specific info

[OHIO RATEPAYER FUNDED PROGRAMS | The LIHEAP Clearinghouse \(hhs.gov\)](#)

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[State Response Tracker - NARUC](#)

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Appendix A: Key Programs and Policies State Comparison Table

References (Continued):

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<https://puc.sd.gov/>

<https://dss.sd.gov/economicassistance/energyassistance/lowincome.aspx>

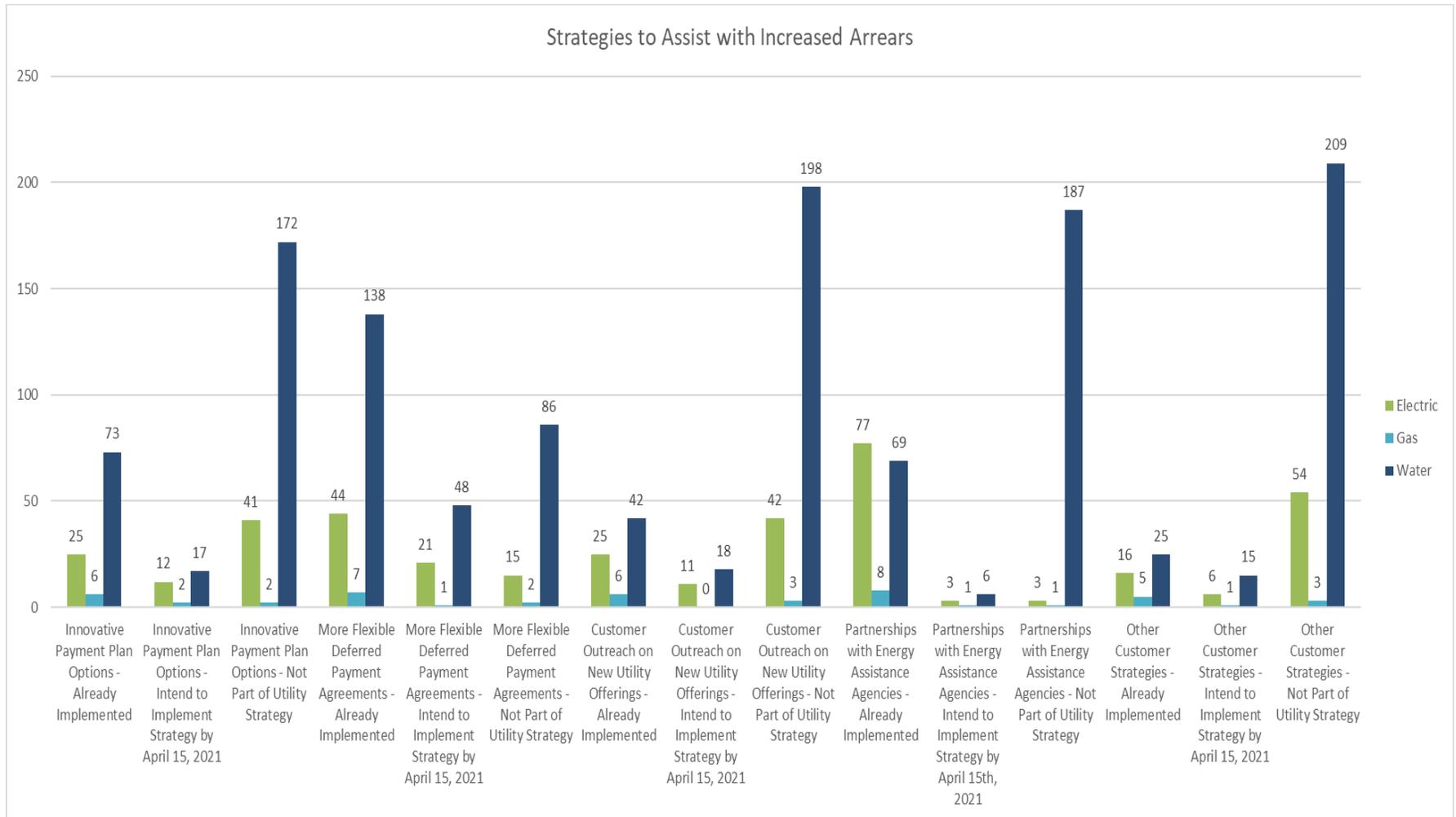
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<https://www.csd.ca.gov/Pages/LIHEAPProgram.aspx>

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<https://www.utc.wa.gov/Pages/Default.aspx>

Appendix B: Summary of Utility Strategies



APPENDIX C
Utility Arrears Management Plans Summary Document

Due to length of document entire text is not listed here. Summary document detailing utility responses can be accessed using the following link: ([PSC REF#: 406396](#))