



By electronic mail

November 25, 2020

NJ Board of Public Utilities
44 South Clinton Avenue, 3rd Floor, Suite 314
Post Office Box 35
Trenton, New Jersey 08625-0350

ATTN: Aida Comacho-Welch, Secretary
Board.secretary@bpu.nj.gov

Re: DOCKET NO. AO20060471: IN THE MATTER OF THE NEW JERSEY BOARD OF
PUBLIC UTILITIES' RESPONSE TO THE COVID-19 PANDEMIC – SCOPE OF
PROCEEDING

Dear Secretary Camacho-Welch,

AARP NJ, on behalf of its 1.3 million Garden State members, thank you for the opportunity to comment on the scope of the proceeding, issues to be addressed, and the timing for addressing the issues identified in the above referenced proceeding. As noted in the Order, AARP NJ expressed our support for Rate Counsel's petition asking the Board to order a formal investigation into the scope of the COVID-19 public health emergency's impact on ratepayers' making of timely payments, a moratorium on the discontinuance of service for non-payment, and the development of appropriate arrearage and bill payment assistance plans. The Order incorporates Rate Counsel's petition in this proceeding.

Accordingly, we urge the scope of this proceeding be as follows:

1. Applicability: Applicable to all regulated and unregulated gas, electric, water, telecommunications and internet services. The ability to maintain safe, affordable, and reliable utility services, including electricity, natural gas, water, telecommunications, and high-speed internet service is critical to compliance with stay-at-home orders and the ability of people to stay engaged with work, education, and loved ones while preventing spread of the virus. This is especially important for our members who are most vulnerable to the virus and those who may already be struggling to make ends meet. During times of a public health emergency, the state should employ its broad authority to ensure access to these lifeline services.

The proceeding should apply to all rate classes.

2. Data Collection and Reporting: AARP NJ supports the data collection and reporting criteria identified in Rate Counsel's October 2, 2020 petition, including:

- a) Require utilities to record and publicly report the aggregate level of late payments, payment arrearages and shutoffs by utility, customer service class and zip code for at least the last two full calendar years (i.e., calendar years 2018 and 2019) to present, and continuing after the moratorium ends.
- b) Data should include number of customers in arrears, number facing disconnection, total amount of arrears, distribution of arrearage amounts among customers in arrears, and distribution of customers in arrears by zip code and by month.
- c) Record and publicly report the level of service disconnections and collections activity by utility and zip code for at least the last two full calendar years (i.e., calendar years 2018 and 2019) through present, and continuing after the moratorium ends. Data should include number of customers disconnected, and distribution of disconnections by zip code and month.
- d) Require utilities to report data on Deferred Payment Arrangements, (DPA), including: total number of customers enrolled in a DPA, number of new customers with a DPA, dollar amounts subject to a DPA, number of customers who successfully completed the DPA and number of unsuccessful DPAs;
- e) Require each utility to report data on the number of their customers who participate in payment assistance programs such as LIHEAP, Universal Service Fund, Lifeline, PAGE, TRUE, NJ Shares, and Fresh Start, as well as the amount of money that the utility receives from each of these programs, for at least the last two full calendar years (i.e., calendar years 2018 and 2019) through present, and continuing after the shutoff moratorium ends;
- f) Report the specific measures each utility is taking to help all customers, including non-English speaking customers, avoid disconnection for non-payment.
- g) Report and update the above referenced information monthly via an easily accessible, public facing dashboard.

3. Re-evaluate non-essential spending and suspend rate increases: Given the current health and economic crises, the BPU should analyze the impacts of any proposed rate increases on disconnections and suspend rate increases until the end of the public health emergency and for a period of 180 days thereafter. In light of the new economic realities, the Board should re-evaluate all non-essential utility expenditures and stem a potential flood of additional rate increases that could hit ratepayers during this period and at a time they are least affordable. Examples of utility programs that are not essential at this time or could drive up rates for millions of at risk consumers during our recovery include but are not limited to ratepayer subsidies for utilities to build electric vehicle infrastructure and continued ratepayer subsidies and bailouts for power plants no longer needed for reliability.

4. Moratorium on Utility Shut-offs: Based on the data collected in this proceeding the Board should determine if the current moratorium on shut offs of electric, natural gas and water services should be extended beyond March 15, 2021 and for a period of 180 days after the end of the public health emergency. This proceeding should also consider measures including the waiving of fees and/or interest on late payments, reconnection of utility customers disconnected for non-payment, waiving of fees and deposits to establish or reconnect services for customers experiencing financial hardship and minimizing or waiving required documentation. The analysis should also be coordinated with the winter moratorium program.

4. Develop a one-time, COVID-19 arrearage forgiveness program and expand utility bill payment assistance programs. Utility bill arrearages related to the COVID-19 pandemic are estimated to be significantly higher than in other periods and in the hundreds of millions of dollars. This proceeding should consider the financing of arrearage forgiveness and other bill payment assistance programs through a combination of shareholder, ratepayer and federal funds. A review of existing arrearage forgiveness and bill payment assistance programs should be undertaken. The BPU, Department of Human Services and Department of Community Affairs should participate and coordinate efforts.

Thank you for your careful consideration of AARP's comments in this matter.

Sincerely,



Evelyn Liebman
AARP NJ Director of Advocacy

Cc: Service List