



Submitted via E-Mail
November 30, 2020

State of New Jersey, Board of Public Utilities
44 S Clinton Ave, 3rd Floor, Suite 314
P.O. Box 350
Trenton, NJ
08625-0350

**RE: NJ Board of Public Utilities Response to the COVID-19 Pandemic
Docket No. AO20060471**

Secretary Camacho-Welch:

On behalf of the undersigned organizations, please accept submit these comments on the New Jersey Board of Public Utilities in the above referenced proceeding.

Respectfully Submitted,

Lawrence Levine
Director, Urban Water Infrastructure
Natural Resources Defense Council

Eric Miller
Director, NJ Energy Policy
Natural Resources Defense Council

Matthew Smith,
NJ Director
Food & Water Watch

Renee Koubiadis
Executive Director
Anti-Poverty Network of New Jersey

Beverly Brown Ruggia
Financial Justice Program Director
New Jersey Citizen Action

Jean Su
Energy Justice Director and Attorney
Center for Biological Diversity

CC: Service List

I. INTRODUCTION

The above-signed organizations appreciate the opportunity to submit these comments as New Jersey grapples with the challenges of the COVID-19 Pandemic and its associated economic impacts, which have significantly affected the ability of New Jersey residents to afford their utility bills. As more and more New Jersey residents stay home, the need for water, electric, and gas services are more critical than ever. Based on data provided by utilities and the NJ Board of Public Utilities (“Board”), it is clear that many hundreds of thousands of New Jersey residents, at least, are behind on their bills and would be vulnerable to service disconnects during the pandemic were it not for Executive Order (“EO”) 190, signed by Governor Murphy on October 15, 2020.

EO 190 prohibits all electric, gas, and water utilities from disconnecting service due to non-payment, through March 15, 2021, to all “residents, which includes all residential accounts and any accounts primarily serving residential customers.” It also requires reconnection without fee of any such accounts disconnected since March 16, 2020. It further prohibits for such accounts the “collect[ion] of any fee or charge imposed for late or otherwise untimely payments or service reconnections that have accrued, and will continue to accrue, during the Public Health Emergency.”¹

Building on EO 190, on October 28, 2020 the New Jersey Board of Public Utilities (“BPU,” or “Board”) issued an order “the scope of the [COVID-19] regulatory asset proceeding to examine all pandemic issues by way of a generic proceeding. . . .”² The Order consolidated that existing proceeding, which authorizes BPU-regulated utilities to create a regulatory asset for potential future recovery of COVID-19 related costs,” with a recent petition by Rate Counsel concerning the impacts of the COVID-19 pandemic. In the Order, the Board requested comments on the scope of the consolidated proceeding, including but not limited to: “[I]mpacts on rate setting, rate design, and utility financial strength; low income and other utility bill assistance programs; regulatory compliance; collections and termination of service; and ensuring the continued provision of safe and adequate service at just and reasonable rates.”³ Additionally, the Board indicated it will consider other regulatory priorities such as “whether, and to what extent, if any, the current or planned clean energy programs or other utility filings or mechanisms should be modified, maintained, curtailed or accelerated.”⁴

¹ NJ Executive Order 190 (Oct. 15, 2020), <https://nj.gov/infobank/eo/056murphy/pdf/EO-190.pdf>.

² NJ Board of Public Utilities Response to the COVID-19 Pandemic, Docket No. AO20060471 [*hereinafter*, “Board Order”].

³ Board Order, at 6.

⁴ *Id.*

We applaud the Governor's executive order. The requirements of that order remain essential to meeting the Board's objective, stated in the Board Order, of "ensuring the continued provision of safe and adequate service" for customers of BPU-regulated utilities in New Jersey. We further welcome the Board's order instituting this proceeding and reiterate the support stated in our October 14, 2020 letter for Rate Counsel's call for "a formal investigation involving all stakeholders...and the development of appropriate arrearage and bill payment assistance plans." We identify below specific issues that the Board should address within the scope of this proceeding, consistent with the Board Order.

We also note that, although EO 190 did not cover wastewater, this proceeding includes all BPU-regulated utilities, including wastewater utilities. Therefore, all of our comments below apply to all BPU-regulated utilities.

Further, we urge the Board, through this proceeding and otherwise, to offer assistance to Governor Murphy and sister agencies to develop and implement COVID-19 reporting requirements and relief policies and programs applicable to non-BPU regulated utilities. This includes, for example, the publicly owned water and wastewater systems that serve the majority of the state's population. New Jersey must ensure that all water, wastewater, electric, and gas customers, regardless of which utility happens to provide their service, have the same rights and protections during this crisis.

II. COMMENTS

In deciding on the scope of this proceeding, we recommend the Board address the following topics: (1) reporting requirements; (2) collections and termination of service; (3) low-income and other bill assistance programs; and (4) the role of planned investments in both state-run and utility-run clean energy programs. We note that Rate Counsel's petition cites examples of other states that have adopted policies addressing many of the topics below. We provide here some additional examples from other states. However, these examples are not an exhaustive list and many other states are continuing to develop and refine their policies. Through this proceeding, BPU should learn and adapt from best practices in other states, as well as develop and refine additional policies and protections to meet the needs of New Jersey's utility customers.

1. Reporting Requirements

The Board immediately should require all regulated utilities to report key data necessary for the Board, other state policymakers (including the Governor and the Legislature), and all interested stakeholders to understand the financial implications of COVID-19 on both customers and

utilities and to ensure full compliance with EO 190 and any subsequent orders in this proceeding. These data include, for example, the total dollar amount of arrears and number of accounts in arrears, disaggregated by customer class, the length of time the bills are overdue, and zip code.

Specifically, the Board should require all utilities to submit to the public docket within three weeks, and monthly thereafter, the data listed in Attachment 1 to these comments. Within one week of receipt of the first set of data, and monthly thereafter, the Board should compile and release these data in a public report that also highlights key findings relevant to the issues in this proceeding.

The National Consumer Law Center has also developed similar recommendations on information utilities should be required to report during and after COVID-19, which we recommend for the Board's consideration.⁵

We note that the limited data we have seen to date suggests that there may be some non-compliance with the reconnection requirements of EO 190. State Senators Ruiz and Singleton requested from BPU certain data on electric, gas, and water utilities on September 18, 2020. BPU provided a response on November 17, 2020, with electric and gas data current through August 2020 and no water data. According to these data, 2,338 residential electric and gas accounts were disconnected due to non-payment as of August 31, 2020. BPU did not explain in its response whether those disconnections predated March 16, 2020. If they did not, and if these accounts (or any others) remain disconnected today, then the utilities are obligated to reconnect them under EO 190 and BPU must exercise its enforcement authority to ensure immediate compliance.

2. Collections and Termination of Service

The Governor recognized in EO 190 that New Jersey residents must not be put at risk of service disconnection due to the financial implications of COVID-19. This principle must apply not only during the pandemic itself, but also during the economic recovery period that will follow, as the economic fallout of the COVID-19 state of emergency will outlast the pandemic itself.

Therefore, the Board should establish through this proceeding requirements concerning: (1) immediate and recurring customer notification of rights and available payment plans and assistance programs; (2) the length and terms of the disconnection moratorium; (3) strengthening reconnection requirements to ensure universal access to service; and (4)

⁵ National Consumer Law Center, "The Need for Utility Reporting of Key Credit and Collections Data Now and After the Covid-19 Crisis," April 2020, https://www.nclc.org/images/pdf/special_projects/covid-19/IB_Data_Reporting.pdf.

consumer protections against other consequences of non-payment, including late fees, reconnection fees, deposits to establish new service, consumer credit reporting, and sale of unpaid receivables to private collection agencies. We identify below specific issues that the Board must address concerning each of these topics.

A. Notification to customers of their rights and available payment plans and assistance programs

The Board immediately should require utilities to notify customers of their rights under the EO and under other relevant laws and orders. These notices should also identify and describe the eligibility requirements and application processes for any available customer assistance programs. Utilities should be required to provide notice on a recurring basis, using at a minimum the same method and frequency of communication by which the utility bills each customer. Utilities should be required to provide notices translated into languages commonly spoken by customers, consistent with state policies and practices regarding language access.

At a recent hearing of the state Senate Economic Growth Committee, on November 11, 2020, a witness representing the New Jersey Utilities Association (NJUA) engaged in a long discussion with committee members, in which everyone agreed that it is critical to minimize avoidable accumulation of customer debt during the disconnection moratorium. Legislators expressed skepticism that utilities are adequately reaching out to customers to encourage and enable them to enter into deferred payment agreements and assistance programs. NJUA did not at that time provide specific information about its members' customer outreach efforts. Given the importance of this issue, BPU must establish specific customer notification requirements. Moreover, BPU should perform ongoing evaluation of the effectiveness of those requirements, based on data submitted pursuant to Point B above, such as data on the rates of participation in deferred payment agreements and customer assistance programs.

B. Length and terms of moratorium

EO 190 established a disconnection moratorium through March 15, 2021, when the EO is currently set to expire. Governor Murphy has the authority to extend that moratorium further. BPU also has independent authority to extend the moratorium beyond that end date, with respect to the utilities it regulates. The Board should determine in this proceeding, and re-assess as appropriate based on new information, how long the moratorium should last beyond March 15, 2021. As a starting point, we urge the Board, as we have urged the Governor and Legislature, to keep in place a disconnection moratorium until at least 180 days beyond the end of the COVID-19 state of emergency.

Additionally, the Board should clarify the applicability of the disconnection moratorium under EO 190. The EO prohibits disconnection of water service for non-payment to "residents, which

includes all residential accounts and any accounts primarily serving residential customers.” We request that the Board issue two clarifications concerning this prohibition. First, many residential households that renter their homes, however, are not “customers” of a utility; rather, the landlord is often the customer. BPU should state explicitly that disconnection of service to premises serving residential units are prohibited, regardless of whether the resident is a customer of the utility. Second, if there are any instances where BPU-regulated water utilities are authorized to disconnect water service due to non-payment of a *wastewater* utility bill, the Board should clarify that such disconnections are prohibited on the same terms as disconnection for non-payment of a water bill.

C. Strengthening reconnection requirements

In the midst of a pandemic, everyone must have access to essential utility services to protect their own health and the public health. To achieve that goal, we urge the Board to establish two protections concerning reconnections that are not addressed by EO 190.

First, reconnection requirements should apply regardless of whether a customer’s inability to pay pre-dated the pandemic or arose from the pandemic. EO 190 requires reconnection of residential accounts disconnected for non-payment after the first social distancing requirements took effect on March 16, 2020. The Board should extend this requirement to include residences disconnected before March 16, 2020. As noted above, BPU data indicate that, as of August 31, 2020, there were 2,338 residential accounts disconnected for non-payment. If any of those accounts remain disconnected today and were disconnected prior to March 16, 2020, the Board must require the reconnection of those accounts immediately.

Second, we urge the Board to specifically require that water utilities perform reconnections safely, including by issuing technical guidelines on how to properly flush piping after service is reconnected. Water systems must be required to provide educational materials on properly flushing piping to residents upon reconnection. Water that has stagnated in plumbing can expose residents to dangerous levels of lead as well as *Legionella* and other pathogens in their drinking water. We recommend the guidance in the footnote below, which was commissioned by Natural Resources Defense Council and developed by a professional engineer with specific expertise in this field.⁶

D. Protections against other consequences of non-payment

There are many other collection practices that can unnecessarily penalize customers for non-

⁶ Safe Water Engineering, “Is your water being turned back on?” April 3, 2020, <https://safewaterengineering.com/news/2020/4/28/flushing-household-plumbing-after-a-water-service-restoration>.

payment during the disconnection moratorium. While a moratorium on disconnection for non-payment does not itself eliminate a customer's obligation to pay utility bills, it is inconsistent with the rationale behind a disconnection moratorium to allow utilities to *penalize* customers who receive the benefit of the moratorium's protections. Therefore, in this proceeding, the Board should adopt and define the terms of the following protections, which should apply during the disconnection moratorium:

- Prohibit fees and charges for late payments and charges for service reconnection, retroactive to March 16, 2020. (EO 190, paragraph 2, appears to allow utilities to levy these charges (except charges for reconnection subsequent to the October 15, 2020 effective date of the EO) while temporarily prohibiting only the collection of these fees and charges. BPU should prohibit these charges entirely during the disconnection moratorium.
- Prohibit deposits to establish new service.
- Prohibit reporting of unpaid bills to consumer reporting agencies.
- Prohibit sale of unpaid receivables to private collection agencies.

3. Low Income and Other Utility Bill Assistance Programs

The Board must ensure that New Jerseyans are not saddled by utility debt that they will be unable to pay – or unable to pay without sacrificing essential needs such as food and medical care. Such a result would do great harm not only to individual customers in arrears, but would inhibit a robust economic recovery. To prevent this outcome, the Board should establish through this proceeding requirements concerning: (1) deferred payment agreements; (2) arrearage management plans, which allow customers to receive debt forgiveness when they are able to resume regular payments of future bills; (3) expanded eligibility and funding for customer assistance programs; (4) equitable funding sources to offset customer debt.

A. Deferred payment agreements

Existing BPU regulations require utilities to offer deferred payment agreements (“DPAs”), which allow for extended repayment of arrears. BPU data, referenced above, indicate that the COVID-19 state of emergency has caused very large increases in the number of customers in arrears for extended periods (90 or more days) and in the average dollar amount by which those customers are in arrears. The standard terms of DPA under the existing rules will not be sufficient to enable these customers to re-pay utility debt even if they regain their pre-emergency level of income. Therefore, the Board should adopt modifications to the DPA regulations, binding at least for the duration of the disconnection moratorium, providing for the

following minimum terms:

- Minimum 24-month repayment period.⁷
- No down payments required to enter into a DPA.⁸ (We note that EO 190, para. 8, includes this provision for telephone and internet providers, but not for water, electric, or gas.)
- Opportunity to renegotiate DPAs. Customers experiencing a change in financial situation during their DPA or who default on their DPA should be offered another DPA with the same terms or better.⁹

B. Arrearage management plans

Under a DPA, a portion of the arrearage is added to the current bill until the arrearage is paid off. While the duration of the COVID-19 emergency is as yet unknown, DPAs are unlikely to be adequate for customers who have missed multiple payments and for whom employment prospects may remain cloudy well into 2021.

Therefore, the Board should establish rules to offer customers arrearage management programs (“AMP”), which can help a subset of struggling low- income households who have significant arrears.¹⁰ With an AMP, the customer only pays the current bill (which is made as affordable as possible) and with each current payment a fraction of the arrearage is forgiven, until the arrearage is completely eliminated. AMPs are designed to stop participating customers from sinking into a debt-spiral and to incentivize regular payments from those customers. They

⁷ As one example from another state, under an order of the Illinois Commerce Commission, large investor-owned electric, gas, and water utilities will provide default 24-month DPAs for residential customers who self-certify as experiencing financial hardship. *Illinois Commerce Comm’n, On its Own Motion -- In the Matter of Moratorium on Disconnection of Utility Services during the Public Health Emergency Declared on March 9, 2020 pursuant to Sections 4 and 7 of the Illinois Emergency Management Agency Act*, ICC Docket No. 20-0309, Stipulation of Large Utility Group and Joint Consumer Parties, filed June 10, 2020. See <https://www.icc.illinois.gov/docket/P2020-0309/documents/300399>.

⁸ As one example from another state, New York requires all electric, gas, and water utilities to offer a DPA with no down payment to any residential customers self-certifying that they have experienced financial impacts from COVID-19 state of emergency. See NY Laws of 2020, Chapter 108, https://nyassembly.gov/leg/?default_fld=&leg_video=&bn=S08113&term=2019&Summary=Y&Actions=Y&Memo=Y&Text=Y.

⁹ The COVID-19 DPA rules in New York and Illinois, cited above, provide examples of this approach.

¹⁰ Charlie Harak, *Helping Low-Income Utility Customers Manage Overdue Bills Through Arrearage Management Programs (AMP)*, National Consumer Law Center (Sept. 2013), https://www.nclc.org/images/pdf/energy_utility_telecom/consumer_protection_and_regulatory_issues/amp_report_final_sept13.pdf.

work best for households with some form of steady income, as households will need to pay current bills. Households experiencing COVID-19 related loss of work and wages, but expecting to return to work once the economy starts recovering are well situated to be successful on an AMP.

While it might be assumed that AMPs result in undue costs to the utility, the National Consumer Law Center has found: “The best available evidence is that AMPs have a positive impact on utility revenues—customers in the plan make higher payments than if they were not in the plan and continue to make higher payments even after completing the plan.”¹¹ Nevertheless, if the debt being forgiven is substantial, the Commission could consider securitization of such debt through low-interest bonds in order to stretch the cost to rate payers over several decades and avoid rate shock. Of note, the National Consumer Law Center has developed an AMP design template based on best practices.¹²

C. Expanded customer assistance programs

For many customers that accumulate significant utility debt during the COVID-19 state of emergency and who were either struggling to stay current on utility bills pre-emergency or face lasting financial distress after the pandemic, neither DPAs nor AMPs will be adequate, as they both require the customer consistently to remain current on new bills. The limited data available to date (referenced above) suggest that hundreds of thousands of residential customers, with hundreds of millions of dollars of cumulative arrears, may fall into this category.

Data reported in this proceeding will help provide a clear picture of the extent of the need for expanded customer assistance programs. Based on that data, the Board in this proceeding should identify and adopt necessary modifications to existing customer assistance programs to meet the need, including increased assistance for ongoing monthly bills and provision for upfront arrearage forgiveness for customers who would otherwise be unable to pay down their utility debt. The Board should consider, for example, expanded eligibility criteria, reduced application burdens, and increased benefit levels and program budgets.

Critically, the Board should develop an assistance program for customers of water and wastewater utilities. Unlike electric and gas, there is currently no statewide program for water

¹¹ Charlie Harak, *Helping Low-Income Utility Customers Manage Overdue Bills through Arrearage Management Programs (AMP)*, National Consumer Law Center (Sept. 2013), https://www.nclc.org/images/pdf/energy_utility_telecom/consumer_protection_and_regulatory_issues/amp_report_final_sept13.pdf.

¹² John Howat, *Electric Service Discount and Arrearage Management Program Design Template*, National Consumer Law Center (April 2020), available at https://www.nclc.org/images/pdf/special_projects/covid-19/WP_Program_Design_Template.pdf.

and wastewater customer assistance, and the programs offered by certain individual water and wastewater utilities are far more modest in scope than the Board's energy assistance programs.

To facilitate administration of new water and wastewater assistance programs, the Board should also develop protocols for Board-regulated electric and gas utilities to share relevant data with water and wastewater utilities (both regulated and non-regulated) concerning customer eligibility for assistance. This data-sharing would provide critical help with the urgent task of reaching out to and enrolling water and wastewater customers, and could even be used to facilitate automatic enrollment in water and wastewater programs, as is the case with some assistance programs operated by utility commission-regulated water utilities in California.¹³

D. Equitable funding sources to offset customer debt

As described above, arrearage forgiveness and other expanded customer assistance programs are necessary to secure essential public health and economic benefits. We recognize that these programs are not without cost. Similarly, utilities will incur carrying costs for delayed customer payments and write-off of uncollectible customer debt. The Board must ensure that these costs are covered adequately and equitably, so that programs can meet the full scale of the need without triggering unaffordable rate increases after the COVID-19 crisis subsides.

In this proceeding, the Board should quantify the costs and evaluate potential funding mechanisms including:

- Existing funding mechanisms for assistance programs;
- State and federal COVID-19 relief funds;
- Contribution from utility shareholders – i.e., requiring that some of the cost be borne by the utilities themselves, just as other businesses have experienced financial impacts due to COVID-19 that they will not be able to recover fully through future sales revenue;
- Offsetting costs with any savings (e.g., reduced expenditures) realized by the utility due to COVID-19; and
- Recovery from ratepayers.

¹³ See *California Public Utilities Commission, Joint Workshop on Water Affordability* (Oct. 30, 2020), slide 2, https://www.cpuc.ca.gov/uploadedFiles/CPUCWebsite/Content/News_Room/NewsUpdates/2020/Final%20Water%20Affordability%20Workshop%20Slides%20-%20Oct%2030%20corrected.pdf.

4. Planned Investments in Utility-run and State-run Clean Energy Programs

The Board should continue with its planned investments in New Jersey's clean energy future. Both Governor Murphy and the New Jersey Legislature have made tackling climate change a core tenant of New Jersey public policy. In doing so, the administration and legislature have tasked the BPU with designing, evaluating, and implementing numerous clean energy investments that make up the backbone of the state's climate mitigation strategy. Such programs include energy efficiency, electric vehicles, solar, wind, and other programs designed to reduce New Jersey's climate pollution.¹⁴

Both the Division of Clean Energy ("DCE") and the state's regulated utilities have recently resolved, active, or planned filings in front of the Board on several clean energy initiatives. For example, every regulated gas and electric utility currently has an active filing on new energy efficiency programs as required by the Clean Energy Act. Additionally, there are currently two active electric vehicle filings in front of the Board, with two more planned in early 2021 as required by the Board EV Ecosystem Order issued to meet the ambitious transportation electrification goals of the PIV Act. Meanwhile, DCE oversees a successful EV rebate program that can award up to \$30 million a year for the next 10 years when NJ residents purchases qualifying vehicles. Taken together, these filings represent billions of dollars in investment in the clean energy sector, lower energy bills for customers, decreased power and transportation sector emissions, and tens of thousands of local well-paying jobs.

Delaying the implementation of these programs would have several immediate and negative impacts on New Jersey. First, it would grind to a halt the clean energy industry in New Jersey, which provides tens of thousands of jobs in the midst of an economic crisis. If New Jersey plans on having a green economic recovery, it cannot take steps that will hollow out the workforce. Instead, planned and pending clean energy investments should move forward to provide much-needed support for those residents who already work in the industry and those who will find employment as the industry continues to grow.

Next, if New Jersey were to delay implementation of these programs it would be unable to meet the ambitious climate and clean energy targets set by the Murphy Administration and the Legislature. For example, the PIV ACT, the EMP, and the ZEV MOU all commit New Jersey to achieving 330,000 EVs on the Road by 2025. However, the state currently has less than 10,000, and the Department of Environmental Protection's recently releases 80x50 report recommended adding more than 100,000 EVs a year for the foreseeable future. Moreover, the PIV Act requires electric utilities to achieve annual average savings of 2.1% of electric retail

¹⁴ Various reports and recently passed legislation underscore the commitment to clean energy investments, including; the 2019 Energy Master Plan, the Integrated Energy Plan, the DEP's recently released 80x50 report, as well as the Clean Energy Act of 2018 and the Plug-in Vehicle Act of 2020.

sales by 2025. If program implementation were delayed, utilities would be behind in ramping up their programs to meet these nation-leading targets.

Finally, there are serious equity concerns raised by any delay in planned program investments. Many utility customers can already not afford to pay their bills. Depriving them of opportunities to use less energy and decrease their utility costs through energy efficiency would only exacerbate this problem. This is particularly troublesome in the context of NJ's successful Comfort Partners program which serves the LMI community. Moreover, delaying new innovative pilots, such as the whole-home pilot proposed by BPU that would provide weatherization, energy efficiency, and health and safety interventions from a single source are exactly the type of programs that should be pursued during this ongoing pandemic.

Attachment 1 – Data Reporting Requirements

Each utility should submit the following data monthly, except as otherwise noted. It should be disaggregated by month, customer class, and by nine-digit zip code. Customer classes should include residential (total residential and identified low-income residential customers), commercial, and industrial.

To provide a baseline for comparison, monthly data should be submitted retroactive to at least January 2019 and annual data should be provided for 2015-2018. Year-over-year changes should be calculated and included with each report.

Accounts and Billing

1. Total dollar amount billed to and collected from customers
2. Average and median dollar amount billed to customers and the average and median utility usage per account;

Disconnections and reconnections

3. Total number of customers
4. Number of service termination/disconnection notices issued for nonpayment of bills
5. Number of customers disconnected for nonpayment of bill
6. Number of service restorations by customer class for customers disconnected for nonpayment of bills
7. Number of customers that became eligible for disconnection due to nonpayment of bills but were not disconnected
8. Average time in between service disconnection for nonpayment of bills and service restoration
9. Explanation of whether the utility has an effective means of distinguishing disconnections for occupied households from unoccupied ones
10. Explanation of whether the utility has an effective means of tracking disconnections for nonpayment for households where the occupant is not the account holder

Arrears

11. Number of accounts in arrears, total dollar value in arrears, and average arrears per account, by age of arrears (30-59 days, 60-89 days, 90-119 days, 120-149 days, at least 150 days)

Late fees and deposits

12. Number of accounts assessed fees or other charges for late payment, total dollar

- amount of such fees or charges, and average dollar amount per account
13. Number of accounts assessed reconnection fees following disconnection for non-payment, total dollar amount of such fees, and average dollar amount per account
 14. Number and total dollar amount of security deposits collected

Payment agreements

15. Number of customers enrolled in deferred payment agreements (DPAs), total dollar amount subject to DPAs, average amount per DPA, and average length of repayment term
16. Number of customers that entered into, successfully completed, defaulted from, or renegotiated a DPA, including the total dollar amount of arrears and average amount of arrears per DPA
17. Number of customers that have failed to maintain one or more DPAs in the preceding 12 months
18. If a utility offers an arrearage management plan (AMP) that includes arrearage forgiveness in exchange for on-time payment of current bills, the same data concerning AMPs as requested for DPAs, plus the total pre-program arrearages forgiven and average amount of forgiveness per customer

Assistance Programs

19. A description of available customer assistance programs, if any;
20. Number of customers that applied for each customer assistance program;
21. Number of customers enrolled in each customer assistance program;
22. Total dollar amount of assistance provided customers in each customer assistance program and average amount per customer
23. Number of confirmed low-income customers (based on enrollment in existing assistance programs) and estimated low-income customers (based on census data)

Communications to Customers

24. The methods and contents of general communications by utilities to customer accounts concerning their rights and available assistance programs

Utility Finances

25. Description of the financial health of the utility during the COVID-19 state of emergency
26. Changes in customer billing and customer revenue during the COVID-19 state of emergency
27. Number of accounts and total dollar amount written off as uncollectible
28. Description of any cost reduction measures taken during COVID-19 state of emergency

29. Description and dollar amount of savings (e.g., reduced expenditures) realized by the utility due to COVID-19
30. Net corporate income and average annual shareholder return
31. Annual compensation, including bonuses, of the executive team