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March 1, 2021

Via Electronic Mail  
Ms. Aida Camacho-Welch, Secretary  
New Jersey Board of Public Utilities  
44 South Clinton Avenue, 9TH Floor  
P.O. Box 350  
Trenton, New Jersey 08625-0350  
[Board.Secretary@bpu.nj.gov](mailto:Board.Secretary@bpu.nj.gov)

Re: I/M/O the New Jersey Board of Public Utilities' Response to the COVID-19  
Pandemic BPU Docket No. AO20060471

Dear Secretary Camacho-Welch:

Please accept for filing in the above-referenced matter the comments of the Anti-Poverty Network of New Jersey. Consistent with the March 19, 2020 Order of the New Jersey Board of Public Utilities ("Board") in I/M/O the New Jersey Board of Public Utilities' Response to the COVID-19 Pandemic for a Temporary Waiver of Requirements for Certain Non-Essential Obligations, BPU Docket No. EO20030254, copies of this comment letter are being filed with the Secretary of the Board. Please acknowledge receipt of this comment letter. Thank you for your consideration and attention to this matter.

First, I would like to thank the Board of Public Utilities for engaging with advocates, the utilities, Department of Community Affairs and others to more fully understand the scope of consumer issues that have been created or worsened by the public health and economic crises of the last year. Through these public hearings and the creation of work groups, we look forward to a transparent and inclusive process to develop the appropriate solutions for residential and commercial customers where total gas and electric arrearages alone through December are a nearly 100% increase over 2019.

We would ask that solutions include:

- No rate increases or late fees until a reasonable time has elapsed for consumers to adequately recover and become current on all of their utilities
- Time-frame parity for the utility moratorium with the current state eviction moratorium that was recently extended through June
- Expanded eligibility and funding for utility assistance, especially as new federal funds are approved, as well as a new water utility assistance program with the federal funds approved in December that could use USF as a model

- Improved and expanded outreach and enrollment assistance for programs in collaboration with non-profit and community partners
- The ability for consumers in arrears to provide self-attestation of their situation being related to the pandemic
- Comprehensive data on both regulated and unregulated utilities collected and analyzed to ensure short and long-term solutions are effective

Lastly, I wanted to again caution against the idea that many utility customers who were not included in low-income utility assistance programs, or otherwise considered low-income consumers prior to the pandemic, are simply not paying their bills because there is a utility shut-off moratorium in place. This kind of thinking does not take into consideration many factors that could prevent them from being able to meet their regular financial obligations over the last year. First, consumers are facing higher utility costs across the board, from increased electric, water, and gas usage while spending more time at home and also relying on devices to stay connected to work, school, medical care, and more. They are additionally faced with new and higher costs for medical care during the public health crisis, buying more protective and cleaning items to stay healthy, spending more on food and delivery of items while at home, acquiring new technology to keep attending school or work, and other pandemic-related costs that are compounded and have inhibited their ability to meet the regular obligations. We know that according to the United Way of Northern New Jersey's ALICE report that nearly forty percent (40%) of people were struggling just to meet the essential items for living early last year. Many more in our state were teetering on the edge of that "working poor" category and have been squeezed financially now with limited ability to return to work full-time or the loss of one or more part-time jobs they were previously cobbling together. They may have a family member with ongoing COVID-19 medical needs or who passed away during this crisis, leaving greater financial obligations with less household income. Or they may be able to meet their needs still, but are now financially supporting extended family members with critical needs as a result of the crisis. By expanding eligibility for existing assistance programs to up to 400% of the Federal Poverty Level and creatively standing up new programs with eligibility that reaches populations previously excluded by either financial or other requirements, we can ensure that families impacted by the crisis can recover without additional harm.

Thank you again for the opportunity to submit comments.

Sincerely,



*Renee Koubiadis*  
Executive Director