



October 1, 2021

VIA ELECTRONIC MAIL

Aida Camacho-Welch
Secretary of the Board
New Jersey Board of Public Utilities
44 South Clinton Avenue
P.O. Box 350
Trenton, NJ 08625

**Re: In the Matter of the New Jersey Board of Public Utilities’
Response to the COVID-19 Pandemic
BPU Docket No. AO20060471**

Dear Secretary Camacho-Welch:

On behalf of New Jersey Natural Gas Company (“NJNG” or “Company”) please accept this submission in compliance with the New Jersey Board of Public Utilities’ (“BPU”) September 14, 2021 Order (“September 14 Order”), which became effective September 21, 2021. The September 14 Order authorized an extension of the regulatory asset period established in this proceeding from September 30, 2021 to December 31, 2022. It also required “utility companies regulated by the Board to file a formal plan within 10 days from the effective date of ...[the] Order¹ outlining how the additional time afforded by ...[the] Order will be used in meeting the [r]egulatory [a]sset [p]eriod deadline.”² This submission complies with the directive in the September 14 Order to submit such a plan by October 1, 2021.

While the September 14 Order does not specify the information that should be included in the formal plan, in the “Comments of the New Jersey Division of Rate Counsel” dated August 4, 2021 submitted in this proceeding (“Rate Counsel Comments”), Rate Counsel recommended that any approval of the extension of the regulatory asset period require “...the formal filing of a plan on how the additional time will be used by the Companies.” (September 14 Order at page 5). Specifically, the Rate Counsel Comments recommended that the utilities be required to “...file a plan setting forth how it will use the additional time to obtain appropriate federal funds and work with customers to reduce arrearages and avoid disconnections....” (Rate Counsel Comments, PDF page 9 of 19). Attachment A included with this submission contains NJNG’s Plan to address these issues.

In accordance with the Order issued by the Board in connection with I/M/O the New Jersey Board of Public Utilities’ Response to the COVID-19 Pandemic for a Temporary Waiver

¹ Ten days from the effective date of September 21, 2021 is October 1, 2021.

² September 14 Order at 6.

of Requirements for Certain Non-Essential Obligations, BPU Docket No. EO20030254, Order dated March 19, 2020, this document is being electronically filed. No paper copies will follow.

Kindly acknowledge receipt of this filing by return email acknowledgment.

Thank you for your attention to this matter.

Respectfully submitted,



Andrew K. Dembia
Regulatory Affairs Counsel

cc: Service List (electronic only)

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NEW JERSEY NATURAL GAS COMPANY
COVID-19 DEFFERAL
CUSTOMER OUTREACH PLAN

October 1, 2021

GUIDANCE and OVERVIEW

This document provides a framework to ensure customers experiencing economic hardship as a direct result of the COVID-19 pandemic maintain access to essential natural gas service by pursuing and advancing consumer protections, customer support programs and customer notification protocols.

This COVID-19 Deferral Customer Outreach Plan was developed to ensure that NJNG's customers have access to reliable and accurate information about assistance that may be available from their utilities, federal and state agencies and their local communities to help them recover from the economic impacts of COVID-19. Utilities are trusted sources of information and assistance; their communications with customers are essential to this effort. Customers who are having trouble paying their bill should first contact their utility. Utilities should proactively reach out to customers with accounts in arrears to encourage customers to enter payment arrangements.

Please note that this guidance does not relieve customers from the obligation to pay for utility services.

BACKGROUND

On March 9, 2020, Governor Murphy signed Executive Order No. 103 ("EO 103") declaring a State of Emergency and a Public Health Emergency in response to the COVID-19 pandemic, authorizing the heads of state agencies to "... promulgate rules to waive, suspend or modify any existing rule, where the enforcement of which would be detrimental to the public welfare during this emergency."

On March 13, 2020, the Board of Public Utilities ("BPU" or "Board") announced the State's public electric and natural gas utilities agreed to suspend service shutoffs due to the public health emergency and the state-wide effort to respond to the COVID-19 pandemic. The moratorium was later voluntarily extended by the utilities until October 15, 2020. On October 15, 2020, the moratorium was extended by Governor Murphy through Executive Order 190 ("EO 190") to March 15, 2021. On March 3, 2021, Governor Murphy further extended the moratorium from March 15, 2021 to June 30, 2021 through Executive Order 229 ("EO 229"). On June 4, 2021, through Executive Order 244 ("EO 244"), Governor Murphy terminated the Public Health Emergency put into effect through EO 103, but continued the State of Emergency established in EO 103.2. EO 244 also directed that EO 229 would remain in effect until January 1, 2022, with the option of the Governor to modify EO 229 prior to January 1, 2022.

Executive Order 246, issued by Governor Murphy on June 14, 2021, and effective July 1, 2021, ended the utility shutoff moratorium and provided a grace period through December 31, 2021, to customers protected by the moratorium against termination for non-payment of natural gas, electric, water or internet service. The grace period was intended to allow customers to apply for available assistance programs, make payment arrangements with utilities to address overdue balances and provide time for the State to decide the process for distribution of American Rescue Plan of 2021 funds to customers in arrears. In addition, when linked with the established Winter

Moratorium period, electric and natural gas utility customers are protected from the termination of utility service for non-payment until March 15, 2022.

On July 2, 2020, the BPU issued an Order in I/M/O Board of Public Utilities' Response to the Covid-19 Pandemic (BPU Docket No. AO20060471) authorizing the establishment of a Regulatory Asset for Incremental Covid-19 Related Expenses ("COVID-19 Regulatory Asset Order") to defer the utilities' incremental costs associated with COVID-19 and the state-wide moratorium on utility service shutoffs. The Board established a timetable for the deferral of these costs on the utilities' books and records starting March 9, 2020, and ending on September 30, 2021, or 60 days after Governor Murphy issues an order, declaration, proclamation or similar announcement that the Public Health Emergency is no longer in effect, or in the absence of such an order, 60 days from the time the Public Health Emergency automatically terminates pursuant to N.J.S.A 26:13-3(b).3.

On September 14, 2021, the Board issued an Order¹, with an effective date of September 21, 2021, directing the utilities, among other things, to file a plan "... outlining how the additional time afforded by this Order will be used in meeting the Regulatory Asset Period deadline." (September 2021 COVID Order, page 6)

Pursuant to the September 2021 COVID Order, this is NJNG's Plan to address how NJNG will use the additional time commensurate with the deferral extension until December 31, 2022.

¹ In the Matter of The New Jersey Board of Public Utilities Response to the COVID-19 Pandemic, BPU Docket No. AO20060471 (September 14, 2021) ("September 2021 COVID Order").

THE PLAN

FEDERAL FUNDS

NJNG has and will continue to work with the New Jersey Department of Consumer Affairs (“DCA”) to aggressively seek federal funding for the benefit of its customers.

REDUCING ARREAGES and AVOIDING DISCONNECTIONS

NJNG wants its customers with overdue balances to know energy assistance may be available. The State of New Jersey has lifted the temporary freeze on service disconnections, which leaves customers with unpaid balances subject to having their service turned off after the grace period ends on December 31, 2021, though the Winter Moratorium rules will extend until March 15, 2022. NJNG is working closely with several state-designated agencies to help connect customers with energy assistance programs and/or set up flexible payment arrangements for overdue balances.

Energy assistance programs are not limited to lower-income households, and free grants may be available for moderate-income families. For example, a family of four with a household income of up to \$128,786 may qualify for some assistance. In fact, customers may qualify for more than one program. NJNG also works with customers to set up flexible, interest-free deferred payment arrangements (“DPA’s”) that allow customers to pay their outstanding balance in installments with no required down payment.

To date,

- NJNG has sent email communications with over 309,000 customer touch points advising of the energy assistance programs.
- NJNG has mailed over 47,000 energy assistance post cards to customers and provided Fulfill with these postcards to include in food bags distributed to schools and the community during free food box days.
- NJNG includes energy assistance information in its bill inserts, monthly electronic newsletter E-tips and its Home Energy Reports.
- NJNG has completed over 72,890 outbound calls, attempting to get customers set up on the energy assistance programs.
- NJNG has mailed 13,083 Energy Assistance applications since March 2020.
- NJNG works very closely with all CAP agencies, county offices, food banks and faith-based organizations throughout its territory to connect with customers.
- NJNG’s unique program the Gift of Warmth (GOW), provides additional assistance from the NJR Charitable Foundation; NJNG coordinates with agencies to provides a one-time grant of up to \$500 to help households, experiencing temporary or unanticipated financial hardship, pay their natural gas bills. Since March 2020, NJNG has distributed \$475,575 in GOW funds to 1,442 customers.

- NJNG has performed over 17,000 field visits to delinquent residential customers, providing assistance program information and offering long-term deferred payment agreements.

NJNG OUTREACH PLAN COMMITMENT

Keep customers connected who are:

- Participating in deferred payment arrangements.
- Making partial payments.
- Pledging or have an appointment to receive assistance from USF, LIHEAP, Lifeline, NJ SHARES, PAGE and Gift Of Warmth.
- Qualified for assistance, if funds are available.
- Communicating and working with NJNG.

CONSUMER PROTECTIONS

NJNG has existing consumer protection policies in place and has adopted additional protections to keep customers connected to essential natural gas service during the COVID-19 pandemic. To assist vulnerable individuals and households with maintaining access to essential services during the economic recovery, NJNG has implemented the following consumer protections:

- NJNG proactively encourages customers with arrearages to contact the utility to help coordinate assistance programs and has undertaken efforts to contact these customers directly by phone, email, door tags or premise visits, if necessary. Contact information is provided on all customer bills and notifications.
- NJNG offers long-term, deferred payment arrangements (“DPAs”) for those directly affected by COVID-19 to allow customers to recover successfully from the unexpected economic impacts of the pandemic. DPAs of six to 24 months, or longer, may be appropriate, considering each customer’s unique circumstances.
- NJNG will continue to work with state and local agencies to help identify customers experiencing economic hardship as a direct result of the COVID-19 pandemic, and help those customers gain access to bill payment assistance.
- NJNG will continue to develop outreach and communications plans to provide information to customers about options for bill payment assistance and payment plans. This may include communications via website, bill inserts, direct telephone and email communications initiated by the utility and/or customer. Where needed, information will be provided in languages other than English, i.e. Spanish.

Residential Customer Engagement

Past-due residential customer outreach

- Reached out to customers with past-due balances to offer help via outbound phone calls, email communication, social media ads and other bill assistance communications.

Supporting customers who have been engaged

- Enrolled engaged customers in a Deferred Payment Assistance program; assisted in helping them apply for energy assistance

Additional steps for those who still have not engaged

- Outbound phone calls, field visits, flexible options or arrangements

Community Outreach

- NJNG has partnered with the several organizations, schools and elected officials to provide content that can be added to their newsletters, social media channels, websites, etc. Some of these organizations are Fulfill, Affordable Housing Alliance (“AHA”), O.C.E.A.N. Inc, Morris County Organization for Hispanic Affairs, Long Branch Police Department and Senator Vin Gopal’s office.
- NJNG uses different media outlets to inform customers about energy assistance programs and energy assistances days, including newspaper, radio, social media and website.
- NJNG hosted a virtual Energy Assistance Webinar where more than 70 attendees from nonprofit organizations and social service agencies across our service territory were provided with up-to-date information on energy assistances and weatherization programs.

Community Outreach via Social Media

The following messages are communicated to NJNG customers via Social Media:

- It’s New Jersey Energy Assistance Week! NJNG utility assistance expert Luisa chats with Luis from the Affordable Housing Alliance about applying for the state’s PAGE program ... you may be surprised to hear the income maximums!
- If you are experiencing financial hardship and need help paying your natural gas bills, New Jersey Natural Gas is here for you. Whether it’s a temporary situation, an unexpected circumstance or perhaps you’re on a limited income, you have options. There are solutions for every customer, including state and federal grants and flexible payment arrangements. Apply by June 30. To learn more: 800-221-0051 and say “energy assistance” email energyassist@njng.com.

- To apply online, head to bit.ly/NJNGPAGE, or you can scan the completed application and supporting documents and email to pageapp@housingall.org, or fax your paperwork to 732-440-4765 (Video of NJNG Outreach Program Specialist and Affordable Housing Alliance).
- Can't make our Energy Assistance Days? If you are behind on your utility bills, help is available. State income-eligibility guidelines have increased to ensure access to energy assistance grants for customers who may not have qualified in the past. For example, a family of four making up to \$123,000 per year may qualify. Contact us to learn about available resources to help you get caught up on your NJNG bills.

Payment arrangements: Schedule monthly payments to pay off a past-due balance.

Energy assistance: Learn about free grants to help pay your bill.

Call 800-221-0051 and say, "Energy Assistance" when prompted, or email energyassist@njng.com.

- Save the dates! We're hosting Energy Assistance Days, where our experts will be on hand, in-person and socially distanced to help with grant applications and to see what programs customers might be eligible for.
 - September 20, 8 a.m. to 2 p.m., and September 22, 1p.m. to 7 p.m. The Church of Visitation, 755 Mantoloking Road, Brick
 - September 24, 8 a.m. to 5 p.m. Bayshore Senior Center, 100 Main Street, KeansburgSee you there! Please bring copies of your utility bills and identification documents.
- Save these dates: we're hosting Mini Energy Assistance Days! Mark your calendars for September 21-24, when NJNG energy assistance experts will help customers navigate which programs they're eligible for and how to fill out grant applications to help pay energy bills. Locations include #BrickNJ and #Keansburg with more to be added soon!
- If you're having difficulties paying your utility bills, don't miss the deadline for the Low-Income Home Energy Assistance Program (LIHEAP)! The application process is open until June 30 (one week from today), and then will open back up on October 1. Start your LIHEAP application online on our energy assistance page at bit.ly/2NF6yGY.
- If you're behind on your energy bills, you can enroll in a Deferred Payment Agreement (DPA) that can help reduce the financial burden of outstanding balances. Call us at 800-221-0051, visit My Account of njng.com for more information about DPAs, or click bit.ly/3uhq7oW.
- Hey #JerseyMoms! Check out this #blog post from Jersey Family Fun about all the ways customers can access free energy assistance: bit.ly/33Zk1yg. #JerseyFamilyFun #njmoms

#njfamilies #utilityassistance #energyassistance #utilityhelpnow #monmouthcounty
#morriscounty #oceancouty

- If you're struggling to pay your #utility bills, there are financial assistance programs available that can provide #UtilityHelpNow. Apply today using the New Jersey Department of Community Affairs' screening tool at nj.gov/dca/dcaid or visit NJNG's energy assistance webpage at bit.ly/3uhq7oW
- Did you know you may be newly eligible for utility bill assistance? New Jersey offers income-based programs that provide financial relief for you and your family. Don't wait, apply today at nj.gov/dca/dcaid or visit NJNG's energy assistance webpage at bit.ly/3uhq7oW (This post was also done in Spanish)
- Are you a #MorrisCounty, #MonmouthCounty or #Oceancounty social worker, social services or nonprofit employee? Attend our Energy Assistance webinar on April 22 to learn all about grants to help your clients pay their #utilitybills. You'll hear about changes to state and federal energy assistance programs' income guidelines and more. Contact energyassist@njng.com to register.

If you need help with paying your utility bills, NJNG has solutions for every customer.