State Level Advocacy: Interaction with PUCs and Beyond

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Why engage in state utility commission proceedings?

- The well-being of low-income households can be profoundly affected by state utility commission decisions.
- “If you aren’t at the table, you are on the menu.”
- Other interests may say they are acting in the interest of low-income consumers.
Examples of State Utility Commission Proceeding Opportunities

• Low-Income Ratepayer Programs
  – Creation
  – Design
  – Implementation

• Examples of Types of Programs
  – Percentage of Income Payment Plans (PIPPs)
  – Arrearage Management Programs (AMPs)
  – Energy Efficiency Programs
Examples of Traditional Low-Income Utility Consumer Protections

• Deposit requirements and establishment of service rules
• Affordable, reasonable payment plans
• Serious illness disconnection protection rules
• Seasonal/ extreme weather disconnection protections
• Protections re natural gas and electric marketers
• Prepaid service proposals
• Energy efficiency financing proposals
Examples of Rate Design Issues/Opportunities

- Low-income discounts
- Fixed charges
- Inclining/declining block rates
- Allocation of cost for ratepayer-funded programs
Other reasons to consider engaging in utility commission proceedings

- Providing the low-income household POV in commission proceedings increases awareness of the parties and increases the opportunity that your POV will be sought out ahead of time before a proposal is final.

- Consider initiating Commission action if there is a problem that needs urgent attention.
Ok, that sounds good. What is involved?

Different levels of engagement

– Intervene as a party
– Work with a coalition
– Track issues as an interested party
– Provide feedback as a member of the public
Different Types of Proceedings

• Ajudicatory
• Rulemaking
• Generic
• Informal
Homework

- Check out the Commission website (Commissioners, hot topics, open proceedings, schedule)
- Talk to folks in your network to see if any of them practice in front of the Commission
- Familiarize yourself with the rules of practice and procedure
- Check out a proceeding if you have time (check to see if the proceeding are streamed)
- If you can work in a coalition, are there members of the coalition that have expertise in front of the Commission?
Some Factors to Weigh in Deciding to Engage at the Commission

• What is the effect of this proceeding on low-income households?
• What is the likelihood of success?
• Resource questions (staff time/ funding/ attorney needed?/ experts?)
• Opportunity to share the load by working in a coalition?
Thank you for your interest in participating in utility commission proceedings.

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