

U-20757 Directive Energy Affordability & Accessibility Workgroup

2/18/21 U-20757 Directive:

- Convene the Energy Affordability and Accessibility Collaborative in coordination with the EWR-LI Workgroup to address the Staff's recommendations in the [U-20757 Collaboration & Communication Process](#) report:
 - ongoing COVID-19 response
 - affordable payment plans
 - affordable energy bills
 - data collection, transparency, and analysis
 - review of rule-based protections
 - communication and engagement
- File an interim report in this docket on the progress made and any recommendations no later than December 17, 2021.

Broad Categories of Inquiry

- On-going COVID-19 Response
- Equity
- Simplify Energy Assistance & Customer Protection System
- Affordable Energy Bills
- Streamline and improve APPs
- Importance of data, transparency, and analysis to inform program design and policy changes
- Review of rule-based protections
- Communication and Engagement

Coordination with LI-EWR

- Explore via discussions with the EWR Low-Income Workgroup how best to coordinate with the EAA Collaborative.
- The Commission further directs the Staff and the EWR Low-Income Workgroup to consider and explore the option of including the EAA Collaborative within the EWR Low-Income Workgroup.
- What could this look Like?
 - One Group
 - Two separate groups with linkages to be defined

Proposed Priorities

- **Priority 1:** develop recommendation for definitions of affordability and energy self-sufficiency for Commission review
- **Priority 2:** develop recommendations to tie LI EWR programs to energy assistance/protections
- **Priority 3:** research implications of expanding energy assistance and protections eligibility to 200% FPL and make recommendations

Proposed Priorities *(continued)*

- **Priority 4:** APP redesign
- **Priority 5:** Long term data strategy
 - Study current data submissions; develop parameters and make recommendations in 2022
- **Priority 6:** Review of Rule-based Protections
 - Study efficacy of the Consumer Billing Rules, Part 7; provide recommendations to improve

Next Steps

- Survey
- April 8 Kick-off meeting

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Appendix

- The following slides provide:
 - Context to on-going collaboration of the Commission
 - Pilots and studies in progress

Ongoing Collaborations

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- MEAP Workgroup –focus on subcommittee work
- Coalition to Keep Michigan Warm
- Statewide Outreach and Education campaign
- Low-Income Energy Waste Reduction workgroup

On-going COVID-19 Response

- **Continued collaboration:**
 - Continue formal and informal collaborations to problem solve issues that arise from the pandemic.
- **On-going data collection:**
 - Require utilities to continue monthly data reporting.
 - Make monthly data publicly available in a protected, more easily analyzed form.
- **Outreach and Education:**
 - Engage in intensive collaborative outreach and education
 - Broaden outreach channels

Ongoing Studies/Collaborations

- Monthly Data on Shutoff and Arrearages
- Commission ordered collaborations on Percentage of Payment Income Plans
- MEAP Workgroup Pilots
 - Propane APP
 - APP for households under 20% of FPL
 - Definition of self sufficiency, self sufficiency metrics
- MDHHS SER/MEAP Study
- Other Commission discussions
 - DTE One-time Balance Reduction Initiative
 - DTE and Consumers Gift Programs
 - Utility Flexible Payment Plans

The following slides detail suggestions for Commission consideration in the areas of study for the Energy Affordability and Accessibility Collaboration

Simplify Energy Assistance and Customer Protection System

- Study the alignment of income eligibility across energy assistance programs & customer protections, including studying the impacts of expanding eligibility to 200% or under the FPL.
- Analyze the application, eligibility determination, & program design for assistance programs & utility-based credits. Provide recommendations for alignment & simplification.
- Direct utilities to pilot the targeting of communications so that recipients of an energy assistance program will be alerted to eligibility for energy efficiency programs.

Affordable Energy Bills

- Explore adopting common definitions of energy affordability & energy self-sufficiency with the goal of reducing the number of households with unsustainable energy burdens. Areas to consider include:
 - Conduct a broad stakeholder review of the MEAP Workgroup Subcommittee definition of self-sufficiency with the intent of recommending a common a standard
 - Use an energy affordability definition as a foundation for refining APPs & other energy assistance options
 - Define a process that systematically ties EWR & weatherization assistance to energy assistance programs
 - Study affordability re multi-family housing & landlord-tenant issues.

Affordable Payment Plans

- Establish universal metrics for APPs to enable consistent comparison across programs
- Explore payment plan models for households who may not become self-sufficient over time.
- Evaluate payment plan models based on affordability, including PIPPs – set up evaluation model?
- Evaluate utility based flexible payment plans under COVID-19; compare to WPP, SPP, & utility specific budget plans
- Evaluate current MEAP APPs; making recommendations for improvements, including assessing the MEAP Workgroup pilots
- Explore the implications of expanding eligibility to 200% FPL

Affordable Payment Plans *(continued)*

- Study utility uncollectibles and costs of collecting ratepayer funds spent on assistance to better understand trade-offs between collections, shut offs, and assistance models
- If applicable, electric cooperatives and municipal utilities could explore expanding APPs, such as the Great Lakes Energy pilot.

Data, Transparency, & Analysis

- Explore a long-term data collection strategy, using the monthly shut off and arrearage data submissions required under the July 23, 2020 Order, the quarterly reports required under Rule 51, and national best practices.
- Engage with NARUC to explore the elements of the resolution on best practices and data collection reporting.

Review of Rule Based Protections

- Study the efficacy of the Consumer Billing Rules, Part 7 Energy Assistance and Shut off Protection Programs for Residential Customers and provide recommendations for improvement.

Communications and Engagement

- Continue with formal/informal collaborations
 - Establish regular mechanisms for stakeholders to provide input on improving communication materials & outreach strategies
 - Broaden outreach to groups traditionally not a part of utility communications. Any discussions should include 211.org, the state-wide hub for customers accessing all kinds of assistance.
- MI Power Grid Workgroup on Customer Education & Participation consider the outreach and education discussion in this report in their deliberations.