

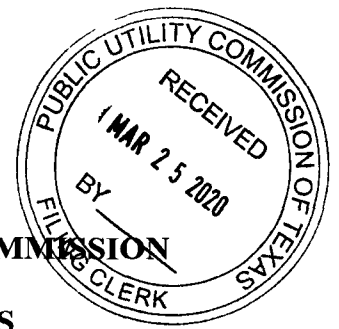


Control Number: 50664



Item Number: 82

Addendum StartPage: 0



PROJECT NO. 50664

EMERGENCY RULEMAKING TO  
PROVIDE CUSTOMER RULES  
FOR TEMPORARY SUPPORT  
TO VICTIMS OF COVID-19

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PUBLIC UTILITY COMMISSION  
OF TEXAS

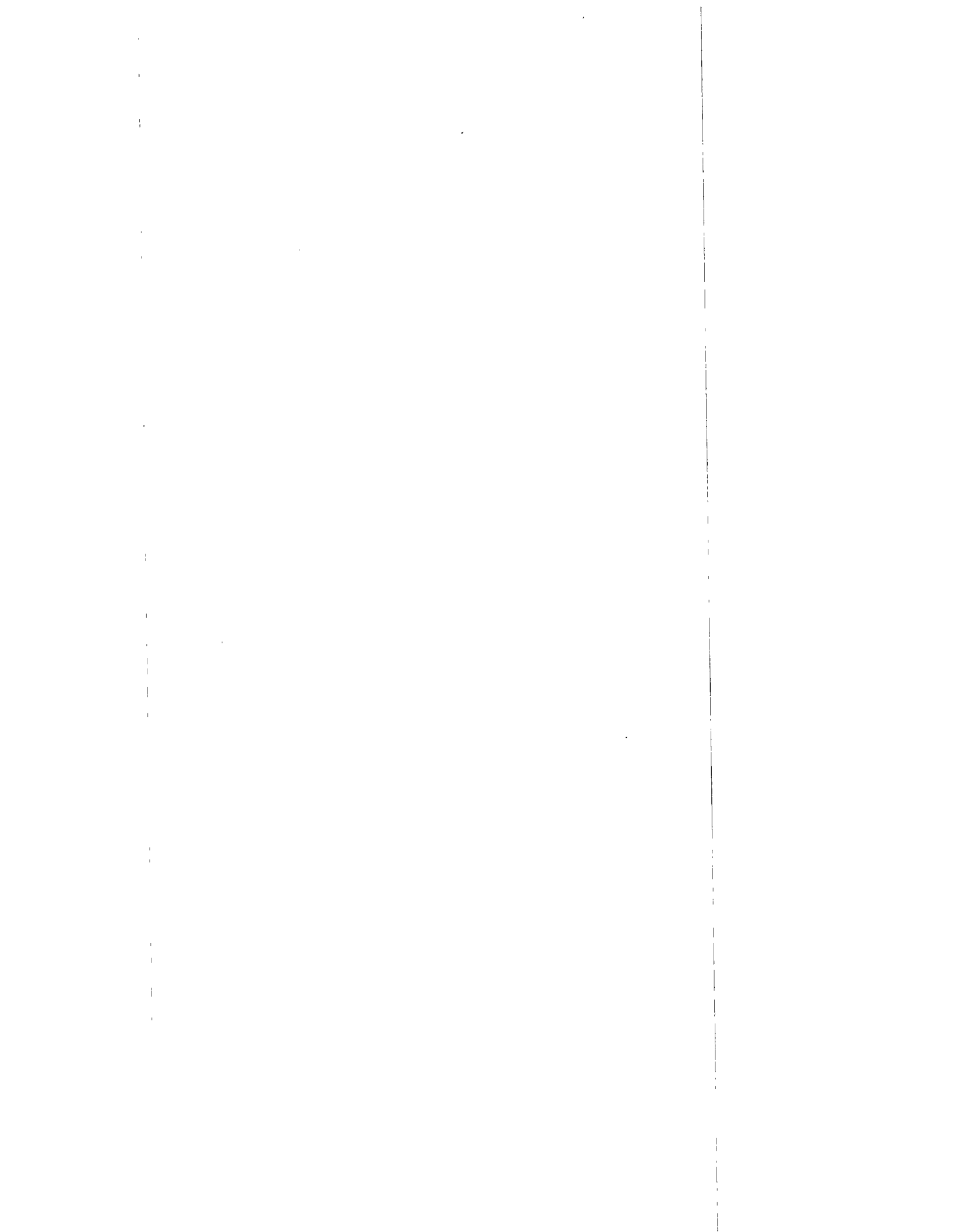
**SUPPLEMENTAL COMMENTS TO  
PETITION FOR EMERGENCY RULEMAKING  
TO PROVIDE CUSTOMER PROTECTION RULES  
FOR TEMPORARY SUPPORT TO VICTIMS OF COVID-19**

TO THE HONORABLE PUBLIC UTILITY COMMISSION OF TEXAS:

Texas Legal Services Center staff have reviewed the Memorandum and draft Orders filed on March 24, 2020 by Chairman DeAnn Walker. We commend the Chairman, fellow commissioners, and all PUCT staff who have worked tirelessly to respond to the crises that directly impact the health and safety of residential customers. The proposed set of bold actions, including the COVID-19 Electricity Relief Program, speaks volumes to the enormity of the payment problems that will be faced by consumers and by regulated utilities and retail electric providers.

To strengthen customer enrollment aid through the Relief Program, and to ensure fund accountability and transparency, we respectfully recommend the following five measures:

1. **Low Income List Administrator** - The customer identification process is now funded by voluntary contributions from Retail Electric Providers (REPs). The Relief Program provides a mechanism such that the list is available to all REPs and at no cost. We urge the Commission to continue this funding mechanism for the LILA when the emergency program expires by having ERCOT or TDUs provide necessary funding.
2. **TWC Coordination** - We urge the Commission to partner with the Texas Workforce Commission such that new filers for unemployment compensation are provided a link to enroll



in the Relief Program. By experience we know that customers who have payment issues do not volunteer or otherwise describe to company representatives the nature of their inability to pay.

3. **Day Job Workers** – Among the poorest of Texans that struggle to pay rent and utilities are individuals who self-employed in day jobs. They are landscapers, handy persons, and other self-employed workers who barely make minimum wage. The previous PUCT contract with SOLIX allowed those individuals to self-enroll in the former discount program. In its contract with SOLIX, we urge the Commission to provide those workers who no longer have significant family income to self-enroll based on income and receive the same protections as employees.
4. **Emergency Protections to Extend to Households** – Consumer advocates observed hundreds of thousands of eligible families denied help when the LILA contract with SOLIX was amended to require that the names on customer bills exactly match the names on the state eligibility roles of Medicaid and SNAP. The numbers of households receiving help through the system benefit fund plummeted. While some numbers resulted in customers improperly receiving discounts, the vast majority were from instances where the person receiving public benefits did not have an exact name match due to a name change following marriage or due to the death of a spouse. Particularly during this emergency period, we recommend that the SOLIX contract be clear that street address information be used for matching purposes to ensure that all eligible protections are available in these circumstances.
5. **Public Reporting and Program Transparency** – Until the crisis is resolved, we urge the Commission to continue this project on its ongoing Open Meeting agendas as a report and possible action item. There is no doubt the program will need fine tuning as it progresses. Aggregated information available to the public should include data by TDU service area

regarding disconnections, specific data on revenue and costs, payments to REPs, and most importantly the numbers of households who are helped by the Commission's targeted program.

Again, we applaud the Commission for following the path of other states in ensuring that basic water, sewer, and electricity service is available to households affected by the current crisis. We respectfully request that you individually consider each of the above recommendations in the design and oversight of the emergency orders.

Dated: March 25, 2020

Respectfully Submitted,

by **Texas Legal Services Center**

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