

**Docket 5-UI-121****SUMMARY OF COMMENTS**

This document is a summary by Public Service Commission (Commission) staff of comments received in docket 5-UI-121 during two public input sessions and the associated scoping comment period. It is provided to Commission staff, utilities, intervenors, and the public as a reference for consideration during the continued investigation into the development of alternative low-income assistance programs, including a potential Percentage of Income Payment Plan (PIPP) Pilot.

**Background**

The investigation in this docket stems from the Final Decision for Wisconsin Electric Power Company's and Wisconsin Gas LLC's (utilities) 2022 rate case in docket 5-UR-110. ([PSC REF#: 455451](#).) The record in that docket identified innovative low-income assistance programs that the Commission found merited further consideration. The Commission ordered the utilities to work with Citizens Utility Board (CUB), Commission staff, and other interested groups to consider the development of alternative low-income assistance programs, including a potential PIPP. The Commission opened an investigation docket (5-UI-121) on March 16, 2023. ([PSC REF#: 461997](#).) A parallel investigation was opened for Wisconsin Public Service Corporation (WPSC) in docket 6690-UI-101. ([PSC REF#: 462362](#).)

Generally, PIPP programs are intended to make participating customer utility bills more affordable upfront and reduce the likelihood of missing payments, through program designs that keep a customer's bill within a certain percentage of their income. PIPP programs currently operate in a number of other states by different utilities and have variations in program design and implementation. Typically, this type of program does not set a utility rate – rather, it charges all residential customers at the same rate but applies a credit or cap to the low-income participant's bill. The goal of this investigation docket is to gather input on whether PIPPs or other alternative low-income programs have support from interested groups and the public, and identify specific program design characteristics of Wisconsin-based alternative low-income assistance programs that are of interest to participating groups and merit further consideration by the Commission.

**Public Input Sessions and Comment Period**

Two public input sessions were held on Wednesday, June 14, 2023, at the Washington Park Branch of the Milwaukee Public Library (afternoon session) and the Neighborhood House (evening session) in Milwaukee, Wisconsin. The intent of these sessions was to provide an opportunity to facilitate dialogue between all interested parties and the public as well as provide utility customers an opportunity to share first-hand perspectives that will be beneficial in this investigation. Attendees were able to share information about their experiences with existing low-income utility assistance programs and/or the development of new low-income utility assistance programs in an informal setting, with staff from state agencies, the utilities, and consumer advocates available to provide information or participate in discussions. The public

input sessions were held in a hybrid format (in person and via Zoom) at the request of some individuals that would not be able to attend in-person sessions.

Commission staff provided a brief presentation on the history of the dockets and the goals of the public input sessions, along with a brief description of low-income assistance programs and a list of potential questions or topics to prompt questions or comments. A brief presentation on PIPP programs and the need for low-income assistance programs was also provided by staff from Walnut Way Conservation Corp., an intervenor in the rate case and this docket. After the presentations, attendees were invited to discuss topics with Commission staff and other attendees, as well as staff from CUB, the utilities, Walnut Way, and the Department of Administration's energy assistance team. After a period of open discussion, attendees were brought back together to share their thoughts on the topics discussed in a group session. At the end of the session, attendees were encouraged to document their comments on a paper form or online.

The comment period was opened from May 31, 2023 through June 20, 2023, to allow for feedback to be provided by those that could not attend in person and document responses from attendees. The public input sessions and associated comment period were not a public hearing, but rather, ways to gather information for staff, the utility, and intervenors in the docket to use in the ongoing investigation of these programs. Paper comments submitted at the public input sessions, by mail, or as online comments via the Commission's Electronic Records Filing (ERF) system were reviewed by Commission staff for this summary.

### **Summary of Comments**

This document is a summary of those comments and is provided as a reference for consideration as parties to the docket work on the development of alternative low-income assistance programs, including a PIPP. Any program proposal that may result from this collaborative effort will require Commission approval prior to implementation. Additional comment periods may be available throughout that process.

Eighty-nine individuals – including one State Senator - provided comments associated with the Milwaukee public input sessions. Comments often covered multiple themes or topics. A list of the comments with their link to documentation on ERF is provided as Appendix A to this document. Main themes of the comments are described below:

Support for PIPP: A majority of commenters stated support for PIPP programs generally, with additional comments provided on what specific benefits for low-income customers could be anticipated with the establishment of a PIPP for the utilities' customers. Themes included:

- Enrollment in a PIPP will improve affordability and predictability of bills.
- PIPP programs will improve equity for customers and neighborhoods that have experienced systemic inequality.
- Support for PIPP programs as energy costs are high and homes in neighborhoods are not energy efficient.

- Existing energy assistance programs are only temporary fixes, while PIPP could provide longer term stable affordability of energy.

Opposition to PIPP type program: Some comments, including those from the State Senator, expressed opposition to or reservations regarding the establishment of a PIPP program.

Concerns included:

- A lack of statutory authority to have different rates for different residential customers.
- Administrative complications involved with running a program that would require monitoring household income.
- Charging a fixed rate to customers regardless of how much power they use could remove incentives for customers to manage energy usage and costs, which could increase stress on the grid.
- Cost impacts on families that would not qualify for the program, particularly those just above the eligibility threshold to qualify for the program.
- Privacy concerns from some commenters that do not want personal information, including income data, held by the utilities.
- Other existing programs provide energy assistance that should be sufficient to address low-income customer needs and this new program is not needed.

Program Design: There were a range of comments that addressed the design elements of a potential PIPP, including eligibility, enrollment, how a program would work with other existing programs, and long-term use.

- Many program design comments reinforced the need for easy or streamlined enrollment, with many comments on this topic suggesting auto-enrollment. Some commenters suggested requiring automatic eligibility and enrollment for qualifying customers.
- If bill is paid over consecutive months, issue a credit as incentive to keep paying.
- Provide support to individuals in school, first-time parents, and people with disabilities.
- Do not remove someone from the program if their income goes up as it could be a disincentive.
- Combine PIPP and Low-Income Forgiveness Tool (LIFT) programs to have affordable bills while addressing any previous arrearages.
- PIPP should be broad based: 1) anyone with a bill, 2) across a whole zip code.
- PIPP should be a permanent program – not just a Pilot.
- PIPP Pilot should be available to all eligible ratepayers.
- A PIPP program should be paid for by using a percentage of dividends or state funds, rather than paid for by utility customers.

Energy Burden Level: Energy Burden is defined as the percentage of gross household income spent on energy costs. A PIPP is intended to improve affordability and lower energy burden to a certain level. Comments on a range of energy burden levels to use as a cap for PIPP program were provided.

- A slight majority of comments addressing the issue stated a PIPP should cap energy costs at 6% of income.
- Those that supported a lower percentage stated that 6% is considered ‘burdened’ by those that study energy burden nationally, and that lower percentages should be used, such as 3%.
- Another comment suggested different percentages for different income levels, i.e. 1% for those earning \$25k or less, 2% for those earning between \$25k and \$50k, and regular rates above that income level.

Affordability Challenges: Many commenters referenced the recent rate increase and associated challenge this presents to paying their utility bills. Other commenters described situations they or those they were close to had experienced that contributed to affordability challenges.

Comment themes on this topic included:

- Individuals that are currently on budget billing described increases (i.e. \$50/month) and the impacts to their overall budget.
- Some individuals on budget billing described how increases were not adequately communicated by the utilities, which created challenges to affordability. They asked for improved notification and communication on these items.
- Historic inequalities have created economic pressures on Black, Indigenous, and People of Color (BIPOC) communities, and energy should be affordable to all.
- Stress from affordability challenges, particularly disconnections, is detrimental to health and safety of residents. Improving affordability could have wider benefits by reducing stress and stabilizing neighborhoods.
- Some commenters said that they paid utilities at cost of other essentials.
- Seniors on fixed income need additional assistance to improve affordability.
- Residents tried to decrease energy use, but utility bills are still too high.
- Multiple commenters supported fully stopping disconnections.
- Individuals whose income is too high to qualify for existing energy assistance can still face affordability challenges.

Education and Outreach: Commenters suggested that the utilities and Commission improve outreach, education, and communication on existing programs, bills and disconnections, and any new program such as a PIPP. Themes included:

- The utilities should improve outreach on their websites and provide regular updates on programs via their websites and social media.
- More education on available energy efficiency programs is needed.
- There should be uniformity in utility responses to customers that could benefit from these programs. Being offered enrollment in a program should not be dependent on who a person speaks to at the utility.
- Communication with customers should be clear and transparent, particularly when discussing the program design and eligibility.
- Better ways to communicate and access energy assistance is needed.

Homes need more efficiency improvements: Comments on the condition of housing stock in some neighborhoods emphasized the poor insulation or other factors that increase energy bills. There were comments that requested additional assistance or other comments that highlighted how these buildings impact utility bills, particularly for low-income customers. Themes included:

- Updates to existing weatherization programs are needed.
- Poor housing stock in terms of home efficiency supports the need for a PIPP program.
- Landlords do not have incentives or requirements to improve building efficiency and tenants are unable to access programs that improve efficiency, resulting in higher energy costs.
- Provide a specific program for seniors to improve energy efficiency in their homes, which would reduce bills and improve comfort and health.

Energy Transition: Some commenters stated that having access to a PIPP program would keep energy affordable for low-income customers during the time of an energy transition as coal-fired power plants retire and new utility-scale solar or battery projects are constructed. Suggestions included:

- Funding for PIPP could come from entities that have contributed to pollution/climate change.
- PIPP would keep energy affordable for disadvantaged communities during the energy transition.
- Several comments supported changing utility model (move to public/municipal).
- Many commenters were supportive of the transition to renewable energy.

Access to Solar: Separate from the specific design of a PIPP program, but connected to an overall topic of improving affordability and reducing energy burden, commenters stated that they would like access to solar panels in order to reduce their bills. Themes included:

- Increase deployment of solar panels on low-income residences. This would offset their bills and reduce energy burden.
- Explore neighborhood or community solar options and offer subscriptions to local residents to reduce their bills.
- Providing access to solar would decrease both energy burden and greenhouse gas emissions.
- Combine access to solar with a PIPP program for residents – study the impacts on energy burden/affordability/wider community and use as a model for other areas.

## Appendix A - Docket 5-UI-121 PUBLIC COMMENTS RECEIVED

1. [PSC REF#: 470948](#) Comments from Senator Julian Bradley
2. [PSC REF#: 470646](#) Public Comment by Carolyn A Stevens
3. [PSC REF#: 470421](#) Public Comment by Adrian Spencer Good
4. [PSC REF#: 470521](#) Public Comment by Alice J
5. [PSC REF#: 471019](#) Public Comment by Amanda Luciano
6. [PSC REF#: 470777](#) Public Comment by Amy Rohan
7. [PSC REF#: 470841](#) Public Comment by Barseana Simond
8. [PSC REF#: 470982](#) Public Comment by Betty Smith
9. [PSC REF#: 470986](#) Public Comment by Branden Evans
10. [PSC REF#: 470517](#) Public Comment by Bruce Brewer
11. [PSC REF#: 470926](#) Public Comment by Bryan Rogers
12. [PSC REF#: 471022](#) Public Comment by Catherine Robinson
13. [PSC REF#: 470824](#) Public Comment by Charissa Macorncan
14. [PSC REF#: 470261](#) Public Comment by Charles F. Brummitt, M.D.
15. [PSC REF#: 470470](#) Public Comment by Dale Parsons
16. [PSC REF#: 471013](#) Public Comment by Davina Anderson
17. [PSC REF#: 470695](#) Public Comment by Dawn M Hutchison-Weiss
18. [PSC REF#: 470505](#) Public Comment by Dea Wright
19. [PSC REF#: 470611](#) Public Comment by Derrick Wilson Sr
20. [PSC REF#: 469793](#) Public Comment by Dianne Bolden
21. [PSC REF#: 470362](#) Public Comment by Donielle Rouse
22. [PSC REF#: 469869](#) Public Comment by Dorothea Macon
23. [PSC REF#: 470266](#) Public Comment by Ebony Jackson
24. [PSC REF#: 470472](#) Public Comment by Erica Steib
25. [PSC REF#: 470518](#) Public Comment by Faithe Colas
26. [PSC REF#: 470960](#) Public Comment by Fatima Laster
27. [PSC REF#: 469782](#) Public Comment by Gladys Berry
28. [PSC REF#: 470425](#) Public Comment by Greg Brown
29. [PSC REF#: 470604](#) Public Comment by Helen Sylvester
30. [PSC REF#: 470809](#) Public Comment by Iris White

31. [PSC REF#: 470984](#) Public Comment by j gray
32. [PSC REF#: 470155](#) Public Comment by Janice Austin-crump
33. [PSC REF#: 470983](#) Public Comment by Jeanette Stevens
34. [PSC REF#: 469768](#) Public Comment by Jeff simmerman
35. [PSC REF#: 470264](#) Public Comment by Jennifer Abel
36. [PSC REF#: 470605](#) Public Comment by Julie Taylor
37. [PSC REF#: 470599](#) Public Comment by Juliesa Deleon
38. [PSC REF#: 469784](#) Public Comment by Kareesha Ware Zoller
39. [PSC REF#: 470692](#) Public Comment by Karen Higgins
40. [PSC REF#: 470684](#) Public Comment by Karyn Rotker
41. [PSC REF#: 470847](#) Public Comment by Kenneth T Madden
42. [PSC REF#: 470456](#) Public Comment by LaQueena Wilson
43. [PSC REF#: 470424](#) Public Comment by LaShawnta Lewis
44. [PSC REF#: 470609](#) Public Comment by Lee R Weasler
45. [PSC REF#: 470602](#) Public Comment by Maria soto
46. [PSC REF#: 471011](#) Public Comment by Megan Echols
47. [PSC REF#: 469773](#) Public Comment by Michael Komba
48. [PSC REF#: 470932](#) Public Comment by MICHELLE FARLEY
49. [PSC REF#: 470363](#) Public Comment by Mohammad yaseen
50. [PSC REF#: 469785](#) Public Comment by Morgan rucks
51. [PSC REF#: 470030](#) Public Comment by Mr. & Mrs Kenneth McGhee
52. [PSC REF#: 470817](#) Public Comment by Ms. Howard
53. [PSC REF#: 470953](#) Public Comment by Nellie Madison
54. [PSC REF#: 470955](#) Public Comment by Nellie Madison
55. [PSC REF#: 470834](#) Public Comment by Pamela Grant
56. [PSC REF#: 470365](#) Public Comment by Patricia Simpson
57. [PSC REF#: 470265](#) Public Comment by Phillip C Brown
58. [PSC REF#: 470263](#) Public Comment by Rashaad Gray
59. [PSC REF#: 470503](#) Public Comment by Roger Barron
60. [PSC REF#: 470496](#) Public Comment by Rose Scott
61. [PSC REF#: 470479](#) Public Comment by SCOTT FAB

62. [PSC REF#: 471023](#) Public Comment by Sheila Easley
  63. [PSC REF#: 470606](#) Public Comment by Sheyenne Wilson
  64. [PSC REF#: 470829](#) Public Comment by Shunflicia Smith
  65. [PSC REF#: 470406](#) Public Comment by TASHEEMA CLARK
  66. [PSC REF#: 470512](#) Public Comment by Thomas Higgins
  67. [PSC REF#: 469950](#) Public Comment by Tiara Wright
  68. [PSC REF#: 470633](#) Public Comment by Tiwanda Ward
  69. [PSC REF#: 469805](#) Public Comment by Toni Harris
  70. [PSC REF#: 470979](#) Public Comment by Tramel Stevens
  71. [PSC REF#: 470927](#) Public Comment by Trasmus Wright
  72. [PSC REF#: 470954](#) Public Comment by Vicky Jackson
- [PSC REF#: 471215](#) Public Input Comments (17) submitted by paper/mail:
- Hayden Harwood
  - Keviea Guiden
  - Ramona Curry
  - Pastor Carl Slocum
  - Damon A. Shoates
  - Teresa Thomas-Boyd
  - Cassandra Flagg
  - Cassie Steiner
  - Cosmic Shaman
  - Robert Kraig
  - Sabine Peterka
  - John H. Kennedy
  - Celeste Polk
  - Jacqueline Davis
  - Doug Singsen
  - Greg Brown
  - Christopher Whitehall