

GAP Docket Nos. G004/M-20-395, G011/M-20-397, G002/M-20-398, G008/M-20-399, and G022/M20-400 on August 27, 2020 Agenda Meeting.

Supplemental Decision Alternatives for Agenda Item #5 (in addition to Nos. 1-10 in PUC Staff Briefing Papers):

ECC recommends the following decision Alternatives* for Commission consideration (Nos. 11-18. ECC divided its recommendation into two areas, namely Quarterly Outreach Reports and GAP [Annual] Reporting.

Quarterly Reporting

11. Require CPE to continue quarterly reporting, including, including the number and type of LIHEAP and GAP promotional retention efforts.
12. Require CPE to continue telephone, U.S. mail and e-mail communication to past-due customers, to customers applying for Cold Weather Rule protection and to customers receiving disconnection notices to encourage them to apply for LIHEAP, including the provision of LIHEAP applications and LIHEAP website referrals wherever possible.
13. Require CPE to Provide the costs for each outreach activity including, but not limited to, community events, CIP conservation calendar production and distribution, “More Comfort, Less Energy” booklet production and distribution, window kits, production and distribution of other information regarding the Company’s rebate, Home Energy Squad, and weatherization programs, and the costs for all LIHEAP and GAP promotional communication.
14. Require CPE to report the monthly number of LIHEAP and GAP customers compared to those numbers in the same months for the previous three years.
15. Require CPE to provide the average annual and range (low to high) of LIHEAP and GAP customer natural gas usage levels.
16. Require CPE to report on specific efforts to coordinate participation in LIHEAP, GAP and CIP programs, including the Company’s mapping process to target CIP resources based on natural gas usage and census tract demographic data.
17. Require CPE to provide the number of LIHEAP and GAP customers that participate in the Company’s CIP programs.

GAP Reporting

18. Require CPE to standardize the method for reporting allowable, incremental and total GAP administrative costs, using the 2020 report as the format, and continue to provide the percentage of program costs represented by administrative costs.

Though the Department supports ECC's proposals/recommendations above, the Department recommends the Commission:**

19. Request Energy Cents Coalition to provide information on how CPE's disclosing of average annual and range (high to low) of LIHEAP and GAP customer natural gas usage levels would help with such targeting in order for the Commission to determine whether this additional reporting requirement is worthwhile.
20. Request Energy Cents Coalition to explain why the Company's mapping process used to target CIP resources based on natural gas usage and census tract demographic data mentioned in ECC's recommendation No, 15 above would be appropriate.

PUC Staff Comment

Staff suggests the Commission may want to encourage CPE, ECC and the Department convene a meeting to discuss and possibly agree on what CPE should report on in its GAP quarterly and annual reports regarding CPE's Outreach efforts.

21. Request CPE, ECC and the Department to submit a report to the Commission 30 days after its Order in this docket is issued that clearly describes exactly what CPE should report on in its GAP annual reports regarding its Outreach.

*See ECC's Supplemental filing, Alternative Decision Options, August 24, 2020.

**See Department Letter, August 24, 2020