

GOVERNMENT OF THE DISTRICT OF COLUMBIA  
OFFICE OF THE ATTORNEY GENERAL



**KARL A. RACINE**  
**ATTORNEY GENERAL**

**Public Advocacy Division**  
**Social Justice Section**

**ELECTRONIC FILING**

June 30, 2020

Ms. Brinda Westbrook-Sedgwick  
Public Service Commission  
Of the District of Columbia Secretary  
1325 G Street, NW, Suite 800  
Washington, DC 20005

**Re: Formal Case No. 1125 – In the Matter of the Promotion of the Utility  
Discount Programs**

Dear Ms. Westbrook-Sedgwick:

On behalf of the Utility Discount Program Education Working Group, please find enclosed their proposed Customer Education Plan and Administrative Budget for Fiscal Year 2021. If you have any questions regarding this filing, please do not hesitate to contact the undersigned.

Respectfully submitted,

KARL A. RACINE  
Attorney General

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cc: Service List

**BEFORE THE PUBLIC SERVICE COMMISSION  
OF THE DISTRICT OF COLUMBIA**

**IN THE MATTER OF  
THE PROMOTION OF  
THE UTILITY DISCOUNT  
PROGRAMS**

**Formal Case No. 1125**

**CONSUMER EDUCATION PROGRAM  
FOR FISCAL YEAR 2021**

Pursuant to the District of Columbia Public Service Commission (Commission) Order No. 16615, the Utility Discount Program Education Working Group (UDPEWG, or WG) submits the following report detailing the budget and the activities for the Consumer Education Program (CEP) for Fiscal Year 2021 (FY21). The UDPEWG is comprised of representatives for Pepco, Washington Gas, DC Water, Verizon, the Office of People’s Counsel (OPC), the Commission, and the Department of Energy and Environment (DOEE). The FY21 CEP includes new and continuing efforts of the WG to increase awareness of the Utility Discount Programs (UDP).

**I. BACKGROUND**

Pursuant to Commission Order No. 16615 issued on November 21, 2011, the CEP was approved as a replacement for Joint Utility Discount Day in FY12. The CEP’s purpose is to educate low income District residents about the availability and benefits of the UDP offered by local utilities, DC Water, Pepco, Verizon and Washington Gas.

## II. CEP OUTREACH

The UDPEWG discussed many options to improve outreach and awareness for the discount programs. The coronavirus disease of 2019 (COVID-19) pandemic has revealed shortcomings in the current data collection process. The WG proposes focusing funding on online outreach in addition to the television and radio categories for FY21 while continuing radio, print and signs on the Washington Metropolitan Area Transit Authority. Respondents to the CEP survey administered by DOEE expressed a preference for television and social media as the top 2 mediums of choice. The UDPEWG has revisited budgetary constraints which limited the effectiveness of procuring paid social media advertising in FY20. By reallocating funding the WG wishes to add online outreach for FY21, while also leveraging more community and nonprofit partners to reach residents recently impacted by the COVID-19 pandemic response.

The COVID-19 pandemic response resulting in shutdowns of business across the country means many who may not have been eligible for the UDP are now in need of this vital assistance. Some residents may find that they no longer have a job, or their income may have been significantly reduced. The UDP can and should be made available to these residents, and in an effort to reach these households who may have never applied for assistance before the UDPEWG will engage in a more robust community engagement through nonprofit partners who are already seeing large numbers of families in need.

The UDPEWG has agreed to coordinate outreach to the following community and nonprofit organizations:

- Capitol Area Foodbank
- Bread for the City
- Department of Aging and Community Living
- Collaborative Solutions for Communities

- Edgewood/Brookland Family Support Collaborative
- East River Family Strengthening Collaborative, Inc. (ERFSC)
- Far Southeast Family Strengthening Collaborative
- Georgia Avenue Family Support Collaborative

### III. CEP BUDGET

The UDPEWG proposes the following budget allocations for the \$100,000 CEP budget:

**Table 1. FY 2021 CEP Advertising Budget Allocation**

<b>Medium</b>	<b>Vendor</b>	<b>Budget Allocated</b>
<b>Radio</b>	Radio One(WOL,WYCB,PRAISE,MAJIC,WKYS, WTEM)	\$9,000
	EL Zol - WLZL 107.9 FM	\$5,000
<b>Signage</b>	WMATA	\$10,000
<b>Print, Online advertising, Social Media</b>	Washington Informer	\$4,000
	El Tiempo	\$3,000
	DCist (WAMU) online community paper	\$7,000
	NCM –multi platform online Movie streaming ads	\$7,000
	<b>Vendor TBD</b>	\$48,000
<b>Television</b>	DC Cable ( <b>FREE</b> PSA's)	\$0
	COMCAST/ EffectTV (DC Homes only) Bravo, TNT, TV One, HGTV, Nickelodeon, BET, truTV, OWN, VH1, Weather Ch. \$7K	\$7,000
<b>TOTAL</b>	<b>\$100K</b>	<b>\$100,000</b>

The UDPEWG wishes to execute a more digitally focused campaign in response to changes in behavior resulting from COVID-19. Therefore the WG has decided to allocate the majority of the CEP budget for digital advertising. The WG having reviewed a few vendor proposals requests additional time to request more information before deciding on which vendor

will execute that service. DOEE will facilitate discussions with potential vendors so that the deliverables can be determined to the satisfaction of the other WG members.

In addition, the WG is adding a new vendor through which UDP advertisements can be displayed on movie streaming platforms. NCM provides “an integrated campaign...on all personal devices – smart phones, tablets, laptops, desktops and smart TVs.” Streaming platforms include Hulu, Sling, AT&T TV Now, Sony Crackle, and Fubo TV among others. An overview of their services is provided in Attachment A.

Radio and television advertising vendors that will continue for FY21 are Radio One, El Zol, and EffectTV (formerly Comcast Spotlight). Print advertising will be converted to online web advertisements where possible with the Washington Informer, El Tiempo, and for the first time with the DCist online community paper. El Tiempo advertising will be concentrated during the winter months in order to capture the attention of gas customers who might be first time applicants. All other advertising will be spread out during the program year with the exception of Washington Metropolitan Area Transit Authority (WMATA) advertising. As in FY20, WMATA buses and metro stations are scheduled during the third and fourth quarters in order to extend the life of signs generated and to reduce the impact of reprinting costs.

#### **IV. SUPPLEMENTAL OUTREACH AND MATERIALS**

Each participating utility and government agency implements supplemental outreach activities for UDP, independent of the UDP and CEP budget. Activities for each utility and government agency are as follows:

##### **A. Verizon**

Verizon’s outreach activities for the Lifeline program include various means by which the community is made aware of the program. The supplemental outreach includes

education and distribution of flyers at community events throughout the District, information about the Lifeline Service on the Verizon DC website and in Customer Advisories in English and Spanish posted at all authorized payment locations in each ward, and print media.

### **B. Washington Gas**

Supplemental UDP outreach from Washington Gas may include: website placement in perpetuity; customer service on-hold messages; flyer distribution at walk-in payment locations in the District; annual letters to low-income households in the District, including information regarding the promotion of RES; and an annual bill insert for District customers, scheduled for the December 2019 billing cycle.

### **C. Pepco**

Promotion of RAD and energy assistance awareness is an integral part of Pepco's community outreach. Through education and outreach efforts, Pepco makes presentations and distributes literature to various community groups on payment plans and energy assistance programs, including the RAD program. During the COVID-19 crisis Pepco has integrated virtual outreach to how RAD information is disseminated to the customers and external stakeholders by participating in on-line meetings and community events. Pepco is also targeting the newly unemployed by working with the District of Columbia Department of Employment Services to reach customers who would not normally be aware of the RAD program. In addition, Pepco designs informational marketing materials, media advisories, and press releases about energy assistance programs, including the RAD program, to present and distribute throughout the community. Pepco customers also receive up to date information on energy assistance availability through the use of social media. Information about energy assistance programs is also

incorporated in targeted customer e-mails, electronic newsletters and bill inserts and distributed through Pepco's website and business offices. Finally, Pepco meets with members of the Council of the District of Columbia, organizations such as the Urban League, civic and citizens' organizations, and Advisory Neighborhood Commissions to encourage participation in the Utility Discount Programs.

#### **D. DC Water**

DC Water continues to inform customers of the Customer Assistance Program. CAP was expanded in 2019 and will be continued in 2021 to include residential customers within a higher income bracket and nonprofit organizations. Information regarding this program is included in the following: “What’s on Tap” (customer bill insert), monthly bill messages, customer service on-hold messages, DC Water’s website, DC Water Guide to Customer Services (mailer/handout), and flyer distribution at community outreach events throughout the District. Information regarding CAP is also included in our Annual Report provided to the public during on-site tours. DC Water Customer Service Associates are trained to identify when customers are in need of assistance and subsequently advises them of the program. In addition, DC Water continues to utilize Facebook, Twitter, and attend Town Hall meetings to further communicate information regarding CAP to our customers.

#### **E. Office of the People’s Counsel**

The Office of the People’s Counsel will continue its outreach efforts to inform District utility consumers about UDP. Annually, OPC’s Consumer Services Division (CSD) staff either conducts or participates in more than two hundred outreach events, and encounters thousands of District residents from diverse socioeconomic backgrounds, including seniors, people with disabilities, and those who are limited or non-English

language speakers. OPC staff will continue to distribute information about UDP through its comprehensive consumer education and outreach program. CSD staff may also inform consumers about UDP during its complaint resolution process. Additionally, UDP information is posted on OPC's website, [www.opc-dc.gov](http://www.opc-dc.gov).

#### **F. District of Columbia Public Service Commission**

The Public Service Commission continues to make utility assistance program customer education a primary focus of its consumer education and outreach. Inclusive in PSC's outreach efforts is a new focus on partnering with frontline workers who have a focus on serving populations in need. The PSC will build bridges with communities affected by COVID 19. And has responded by changing to virtual platforms and developing outreaches that adhere to CDC standards for social distancing.

Moving forward, PSC seeks to grow these partnerships in order to integrate the UDP into every social benefit program across communities affected.

#### **G. Department of Energy and Environment**

As the administrator, DOEE is responsible for implementing the CEP. In addition to that activity, DOEE will promote the UDP on its social media accounts, through sister agencies, and at community events, such as Advisory Neighborhood Commission meetings, fairs, and festivals. UDP information is available on the DOEE website at [doee.dc.gov/udp](http://doee.dc.gov/udp).

### **V. ADMINISTRATION OF CEP**

The UDPEWG will continue to assume responsibility for oversight of the CEP. In this role, WG members will develop and implement the CEP each year. UDPEWG members will review and update outreach materials to be distributed as part of the CEP and develop media and

other community outreach strategies. In addition, the UDPEWG participates in the development of UDP marketing materials and mailings by DOEE.

DOEE will remain the financial administrator of the CEP, procuring advertising for UDP. Each entity that financially supports the CEP (Pepco, Washington Gas, DC Water and the Lifeline Administrator) will contribute \$25,000 towards the promotion of RAD, RES, CAP and Lifeline. DOEE will file quarterly invoices for reimbursement with the Commission. Upon Commission approval, participating utilities, and in place of Verizon, the DC Universal Service Trust Fund Administrator, will make the appropriate payments to DOEE via the DC Treasurer.

DOEE and the UDPEWG understand that UDP expenditures must be documented since the Lifeline Administrator and other participating utilities require an accounting of funding spent on behalf of their respective programs. DOEE will provide to the UDPEWG a quarterly report of UDP costs incurred. This report will include invoices, and summary of quarterly activities; other supplemental documentation of the UDP expenditures will be provided as requested. The UDPEWG will include an accounting of all UDP expenditures in its annual status reports to the Commission.

DOEE proposes the following administration budget for (1) eligibility verification services, and (2) outreach and engagement in FY21. Eligibility verification is the provision, receipt and processing of UDP applications, including:

- Accepting and processing mailed renewal applications.
- Conducting application interviews (by appointment) and processing applications.
- Reviewing and processing online applications.
- Responding to in-person, phone, and Commission-, Council-, and sister-agency referred inquiries regarding discount approval, and discount implementation by the utilities.

- Following up with applicants of incomplete applications to remedy the deficiency.
- Data tracking via DOEE database, and
- Monthly, quarterly, and annual reports to the utilities, Commission and other stakeholders.

Outreach and engagement includes procurement for advertising of the CEP and the oversight and management of those vendor contracts by the Outreach Manager, including the development of advertising layouts, design, and scripts.

DOEE maintains two service centers, manages the CEP, supports a web-supported database infrastructure and online application, and provides regular program reporting to the utility companies and Commission.

For these services, DOEE estimates the combined budget for the administration of the UDP and CEP will not exceed \$741,100 in FY 2021. This represents an increase of approximately 6% over the approved FY 2020 related to personnel cost estimates which have been rounded up to the nearest ten thousand, rounding for all other line items, and an increase for postage costs.

**Table 2. FY 2021 UDP and CEP Proposed Budget**

		Lifeline	RAD	RES	CAP	Total
Administration	Personnel		\$ 160,000	\$ 160,000	\$ 160,000	\$ 480,000
	Postage		\$ 3,000	\$ 3,000	\$ 3,000	\$ 9,000
	Printing	\$ 1,000	\$ 3,000	\$ 3,000	\$ 3,000	\$ 10,000
	Contract svc		\$ 10,000	\$ 10,000	\$ 10,000	\$ 30,000
	Supplies		\$ 700	\$ 700	\$ 700	\$ 2,100
	Database maintenance		\$ 9,000	\$ 9,000	\$ 9,000	\$ 27,000
	<b>Admin Subtotal</b>	<b>\$ 1,000</b>	<b>\$ 185,700</b>	<b>\$ 185,700</b>	<b>\$ 185,700</b>	<b>\$ 558,100</b>
CEP	Outreach Support	\$ 20,000	\$ 20,000	\$ 20,000	\$ 20,000	\$ 80,000
	CEP Advertising	\$ 25,000	\$ 25,000	\$ 25,000	\$ 25,000	\$ 100,000
	<b>Total:</b>	<b>\$ 46,000</b>	<b>\$ 230,700</b>	<b>\$ 230,700</b>	<b>\$ 230,700</b>	<b>\$ 738,100</b>

This FY 2021 budget proposal supports 20% of the salaries for all staff members responsible for the processing of UDP applications and 10% of the managerial staff members'

salaries to match the time spent on each activity. DOEE estimates for expenditures related to information technology (IT) that at least 10% of one IT analyst's time is spent supporting the UDP software, communication with the utility companies, and UDP enrollment tracking and reporting. The FY21 UDP administration budget includes this estimate and 20% of maintenance cost for the Energy Affordability Branch database and online application portal.

The increased postage line reflects the cost for the annual Business Reply Mail permit and to reload the US Postal Service account funding which has been spent down since prior to 2011. Since that time DOEE has only requested reimbursement for the permit costs and vendor costs for the outbound mail related to the annual notice. This increase is expected to carryover for at least 4 years, during which time this line is expected to return to the amount to cover the permit costs only.

In September 2013, the Commission notified the UDPEWG that it had contracted a DC Lifeline Administrator to handle eligibility verification services for Lifeline Service. DOEE continues to provide program promotion and therefore requests that the Lifeline Administrator contribute \$1000 toward printing expenditures for promotional materials (flyer and rack card), in addition to its 25%-share of the CEP (\$25,000<sup>1</sup>) and CEP administration (\$20,000<sup>2</sup>).

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<sup>1</sup> See DOEE estimates the combined budget for the administration of the UDP and CEP will not exceed \$741,100 in FY 2021. This represents an increase of approximately 6% over the approved FY 2020 related to personnel cost estimates which have been rounded up to the nearest ten thousand, rounding for all other line items, and an increase for postage costs.

<sup>2</sup> See Table 3

**Table 3. DOEE FY 2021 Personnel Estimates**

Description	Salary+Fringe	UDP Share	UDP Cost	Lifeline	RAD	RES	CAP
IT Support	\$ 137,896.53	10%	\$ 13,789.65		\$ 4,596.55	\$ 4,596.55	\$ 4,596.55
Application intake	\$ 1,565,660.54	20%	\$ 313,132.11		\$ 104,377.37	\$ 104,377.37	\$ 104,377.37
Application mgmt	\$ 598,462.49	10%	\$ 59,846.25		\$ 19,948.75	\$ 19,948.75	\$ 19,948.75
Reporting	\$ 146,267.08	50%	\$ 73,133.54		\$ 24,377.85	\$ 24,377.85	\$ 24,377.85
	\$ 2,448,286.64		<b>\$ 459,901.55</b>		<b>\$ 153,300.52</b>	<b>\$ 153,300.52</b>	<b>\$ 153,300.52</b>
<b>UDP Administration</b>					<b>\$ 160,000.00</b>	<b>\$ 160,000.00</b>	<b>\$ 160,000.00</b>
Outreach support	\$ 143,857.20	50%	\$ 71,928.60	\$ 17,982.15	\$ 17,982.15	\$ 17,982.15	\$ 17,982.15
				\$ 20,000.00	\$ 20,000.00	\$ 20,000.00	\$ 20,000.00
			<b>\$ 531,830.15</b>	<b>\$ 17,982.15</b>	<b>\$ 171,282.67</b>	<b>\$ 171,282.67</b>	<b>\$ 171,282.67</b>
<b>CEP Administration</b>					<b>\$ 20,000.00</b>	<b>\$ 180,000.00</b>	<b>\$ 180,000.00</b>

Pursuant to Commission Order No. 17246, DOEE will continue to submit and file quarterly invoices within 30 days of the end of the fiscal quarter, with the fourth quarter invoice filed within 60 days of the end of the fiscal year<sup>3</sup>. As in previous years, DOEE will conduct a final reconciliation to balance all accounts at the end of the fiscal year to ensure that each discount program is charged an equal share of the expenses, except for Lifeline services as previously noted. This may result in some imbalances across budget line items.

## VI. CEP EFFECTIVENESS EVALUATION

The UDPEWG has historically measured the effectiveness of the CEP by the number of annual UDP applicants. Given COVID-19 the UDPEWG has discovered some limitations with this process and wishes to increase the data collected to improve our ability to evaluate the CEP.

Historically, DOEE conducted a customer survey for in-person applicants to provide the UDPEWG consumer feedback data on the CEP advertising, allowing the WG and Commission to assess the educational outreach strategies for the CEP and make adjustments and improvements accordingly. During the COVID-19 pandemic response, DOEE was unable to conduct surveys while its offices were closed to the public for in person appointments. The online application system was not equipped to provide surveys at this time. DOEE and the

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<sup>3</sup> DOEE has requested an extension each year to permit time for the year-end closeout process to be completed in order for accurate invoices to be generated.

UDPEWG are exploring alternative options for gathering efficacy data on the CEP for FY21, including surveys conducted through email and text messages.

In addition, in order to accurately capture how and when new, first time applicants learn about the UDP, a new question will be added to the survey to distinguish first-time applicants. The new CEP survey will be made available to applicants through the online process as well as in person applicants going forward. The questions shall be as follows:

- New Question 1 – Is this your first time applying for utility assistance and discounts? (Your response to this question will not impact your eligibility)
  - Yes
  - No
- Question 2 – How did you learn about the Utility Discount Programs (UDP)? (select all that apply)
  - PRINT, ONLINE ADVERTISING, SOCIAL MEDIA
    - Washington Informer
    - El Tiempo Latino
    - DCist
    - Facebook
    - Twitter
    - Web ad
    - Streaming Movie
  - TELEVISION
    - DC Cable Channel 16
    - WJLA 24/7 News channel
    - Bravo
    - TNT
    - TV One
    - HGTV
    - Nickelodeon
    - BET
    - truTV
    - OWN
    - VH1
    - Weather Channel
  - SIGNAGE
    - WMATA Bus

○ RADIO

- 1450 AM WOL
- 1340 AM WYCB
- FM 104.1 PRAISE,
- FM 102.3/92.7 MAJIC
- FM 95.5 WPGC
- FM 96.3 WHUR
- FM 99.1 WLZL

○ OTHER

- Energy Assistance Center
- Neighbor, friend or relative
- Pepco
- Washington Gas
- DC Water
- Verizon
- Office of People’s Counsel
- Public Service Commission
- DOEE
- Other

➤ Question 3 – On a scale of 1-5, how would you rate the information you have received on UDP?

Not enough information,  
needs improvement

Okay, or neutral

Great information,  
Everything I needed

1

2

3

4

5

➤ Question 4 – What outreach would be most effective to inform you about the UDP?

- Print/online (newspaper)
- Television
- Signs on buses/in metro stations
- Radio
- Facebook
- Google ads
- Twitter
- Direct Mailing
- Other

➤ Question 5 – May we contact you to follow up for more information?

- Yes
- No

## **VII. CONCLUSION**

The UDPEWG submits this FY21 CEP plan for consideration and approval by the Commission.

## CERTIFICATE OF SERVICE

I hereby certify that on this 30<sup>th</sup> day of June, 2020, I caused true and correct copies of the Utility Discount Program Education Working Group's proposed Customer Education Plan and Administrative Budget for Fiscal Year 2021 to be emailed to the following:

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*/s/ Brian Caldwell*  
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