

GOVERNMENT OF THE DISTRICT OF COLUMBIA
OFFICE OF THE ATTORNEY GENERAL



KARL A. RACINE
ATTORNEY GENERAL

Public Interest Division
Public Integrity Section

ELECTRONIC FILING

July 1, 2019

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 the enclosed consensus report detailing the budget and activities for the Consumer Education Program for Fiscal Year 2020. If you have any questions regarding this filing, please do not hesitate to contact the undersigned.

Respectfully submitted,

KARL A. RACINE
Attorney General

By: /s/ Brian Caldwell
BRIAN CALDWELL
Assistant Attorney General
(202) 727-6211 – Direct

Email: brian.caldwell@dc.gov

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 2020**

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 2020 (FY20). 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 FY20 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 proposes focusing funding in the television and radio categories for FY20 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. DOEE informed the UDPEWG that budgetary constraints limit the effectiveness of procuring paid social media advertising. In FY19 UDP advertising on television was increased to reallocate funds from social media outreach to add ABC's 24/7 News channel. The UDPEWG intends to continue social media outreach efforts by utilizing existing social media accounts and effective¹ previously created social media graphics will be distributed to the UDPEWG members.

III. CEP BUDGET

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

¹ Based on FY 2018 social media vendor reports.

Table 1. FY 2020 CEP Advertising Budget Allocation

| Medium | Vendor | Budget Allocated |
|-------------------|---|-------------------------|
| Radio | Radio One(WOL,WYCB,PRAISE,MAJIC,WKYS) | \$38,000 |
| | WPGC 95.5 FM | |
| | WHUR 96.3 FM | |
| | WLZL 107.9 FM | |
| Signage | WMATA | \$17,000 |
| Print | El Tiempo Latino | \$18,000 |
| | The Beacon | |
| | Washington Blade | |
| | Street Sense | |
| Television | DC Cable (FREE PSA's) | \$27,000 |
| | WJLA 24/7 News channel | |
| | WDCW 50 | |
| | COMCAST SPOTLIGHT (DC Homes only)Bravo, TNT, TV One, HGTV, Nickelodeon, BET, truTV, OWN, VH1, Weather Channel | |
| TOTAL | | \$100,000 |

UDP television and radio advertising will take place for the duration of the year.

Advertising on the Washington Metropolitan Area Transit Authority 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. Print advertising for UDP will take place in the first and fourth quarters to support the annual notice mailing and reinforce when, where and how to apply.

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 RES and UDP; 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. 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 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 may be continued in 2020 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.

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. In this past year, the PSC conducted or participated in more than 100 events. Inclusive in PSC's outreach efforts is a new focus on educating frontline workers who have a focus on serving populations in need. The PSC set up a number of interagency briefings and learning modules to educate social workers, case managers, teachers and clergy on the utility discount program as way to promote the program to those who need it most. Moving forward, PSC seeks to grow these partnerships in order to integrate the UDP into every social benefit program.

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, and DOEE's social media platforms.

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 Universal Service Trust Fund Administrator, will make the appropriate payments to DOEE via the D.C. 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 FY20. 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 total \$696,431 in FY20.

Table 2. UDP and CEP Proposed Budget

| | Lifeline | RAD | RES | CAP | Total |
|-----------------------|------------------|-------------------|-------------------|-------------------|-------------------|
| Personnel | | \$ 151,566 | \$ 151,566 | \$ 151,566 | \$ 454,699 |
| Postage | | \$ 350 | \$ 350 | \$ 350 | \$ 1,050 |
| 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 | | \$ 8,533 | \$ 8,533 | \$ 8,533 | \$ 25,600 |
| Admin Subtotal | \$ 1,000 | \$ 174,150 | \$ 174,150 | \$ 174,150 | \$ 523,449 |
| Personnel - CEP | \$ 18,246 | \$ 18,246 | \$ 18,246 | \$ 18,246 | \$ 72,982 |
| CEP | \$ 25,000 | \$ 25,000 | \$ 25,000 | \$ 25,000 | \$ 100,000 |
| Total: | \$ 44,246 | \$ 217,395 | \$ 217,395 | \$ 217,395 | \$ 696,431 |

Consistent with its FY19 proposal, DOEE did not make any changes to the percentage funding levels: 20% of the salaries for all staff members responsible for the processing of UDP applications, 10% of the managerial staff members' salaries, and 10% of one senior IT analyst's time. The \$45,442 reflected increase over the approved FY19 budget is due to cost of living increases and the negotiated compensation agreement under which DC Government employees' salaries are determined. The FY20 administration budget includes 20% of the maintenance cost for the Energy Affordability Branch database and online application portal.

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 (\$25,000²) and CEP administration (\$18,246³).

DOEE estimates the personnel portion of the UDP and CEP administration for FY20 will be \$527,681, or \$169,812 each, except for Lifeline which is \$18,246.

² See Table 2

³ See Table 3

Table 3. DOEE FY20 Personnel Estimates

| Activity | Description | Salary+Fringe | UDP Share | UDP Cost | Lifeline | RAD | RES | CAP |
|----------|--------------------|-----------------|-----------|----------------------|---------------------|----------------------|----------------------|----------------------|
| 1040 | IT Support | \$ 155,326.86 | 10% | \$ 15,532.69 | | \$ 5,177.56 | \$ 5,177.56 | \$ 5,177.56 |
| 6020 | Application intake | \$ 1,663,956.30 | 20% | \$ 332,791.26 | | \$ 110,930.42 | \$ 110,930.42 | \$ 110,930.42 |
| 6020 | Application mgmt | \$ 388,413.41 | 10% | \$ 38,841.34 | | \$ 12,947.11 | \$ 12,947.11 | \$ 12,947.11 |
| 6040 | Reporting | \$ 135,067.53 | 50% | \$ 67,533.77 | | \$ 22,511.26 | \$ 22,511.26 | \$ 22,511.26 |
| | | \$ 2,342,764.10 | | \$ 454,699.05 | | \$ 151,566.35 | \$ 151,566.35 | \$ 151,566.35 |
| 5010 | Outreach support | \$ 145,964.10 | 50% | \$ 72,982.05 | \$ 18,245.51 | \$ 18,245.51 | \$ 18,245.51 | \$ 18,245.51 |
| | | | | \$ 527,681.10 | \$ 18,245.51 | \$ 169,811.86 | \$ 169,811.86 | \$ 169,811.86 |

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 year⁴. 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 effectiveness of the CEP will be generally measured by the number of annual UDP applicants, noting that UDP enrollment numbers may be directly affected by the District's changing demographics.⁵

DOEE conducts a customer survey for in-person applicants to provide the UPDEWG 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

⁴ 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.

⁵ According to NeighborhoodInfoDC's DC City Profile – Well-Being (http://www.neighborhoodinfoDC.org/city/Nbr_prof_cityb.html#sec_2_inc) the number of families on Temporary Assistance for Needy Families and Supplemental Nutrition Assistance Program have been declining since 2012. Likewise the number of children and seniors living in poverty has declined 3% and 2% respectively since 2000. (last visited 6/13/2017)

accordingly. The UDPEWG will be responsible for analyzing the survey data collected and compiled monthly by DOEE.

VII. CONCLUSION

The UDPEWG submits this FY20 CEP plan for consideration and approval by the Commission.

CERTIFICATE OF SERVICE

I hereby certify that on this 1st day of July, 2019, I caused true and correct copies of the Utility Discount Program Education Working Group's report on the Consumer Education Program for Fiscal Year 2020 to be electronically transmitted to the following:

Lara Walt, Esq.
General Counsel
Public Service Commission
1333 H Street, N.W.
7th Floor, East Tower
Washington, D.C. 20005
LWalt@psc.dc.gov

Kenneth Mallory, Esq.
Assistant People's Counsel
Office of the People's Counsel
1133 15th Street, N.W.
Suite 500
Washington, D.C. 20005
kmallory@opc-dc.gov

Jennifer L. McClellan, Esq.
Verizon Washington, DC Inc.
1300 I Street NW, Suite 400W
Washington, DC 20005
Jennifer.l.mcclellan@verizon.com

Hussain Karim, Esq.
Department of Energy & Environment
1200 First Street, N.E., 5th Floor
Washington, D.C. 20002
Hussain.Karim@dc.gov

Anna Lising
Department of Energy & Environment
1200 First Street, N.E., 5th Floor
Washington, D.C. 20002
anna.lising@dc.gov

Salvatore Cooper
Solix, Inc.
30 Lanidex Plaza West
Parsippany, NJ. 07054
salvator.cooper@solixinc.com

Cathy Thurston-Seignious, Esq.
Washington Gas Light Company
101 Constitution Avenue, NW
Washington, D.C. 20080
cthurston-seignious@washgas.com

Dennis Jamouneau, Esq.
Potomac Electric Power Company
701 9th Street, NW
Suite 1100, 10th Floor
Washington, D.C. 20068
djamouneau@pepcoholdings.com

Michael Engleman, Esq.
Engleman Fallon, PLLC
1717 K Street, NW
Washington, D.C. 20006
mengleman@efenergylaw.com

/s/ Brian Caldwell
Brian Caldwell