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Center for
Energy Poverty
and Climate

National Cooling Standards Initiative

Mark Wolfe, Co-Director

Winter heating costs are expected to fall by 9.5% this winter compared to the winter of 2022 to 2023. Natural Gas sees the greatest drop, 25.7% in expenditures.

Home heating expenditures in the winter of 2023-2024 are projected to be lower than the previous year however expenditures continue to be 16.5% higher than pre-pandemic levels.

Estimated Winter Heating Costs, 2020-21 to 2023 - 2024

All Fuels is a weighted average of all home heating sources, using the number of households by energy type.

| Winter Heating Season | Natural Gas | Electricity | Heating Oil | Propane | All Fuels |
|---------------------------------|-------------|-------------|-------------|---------|-----------|
| 2020-21 | \$514 | \$917 | \$1,093 | \$1,080 | \$725 |
| 2021-22 | \$658 | \$974 | \$1,708 | \$1,527 | \$852 |
| 2022-23 | \$763 | \$1,078 | \$1,723 | \$1,381 | \$951 |
| 2023-24 | \$608 | \$1,069 | \$1,701 | \$1,345 | \$868 |
| % Change 2022 - 23 to 2023 - 24 | -25.7% | -0.8% | -1.3% | -2.7% | -9.5% |
| % Change 2020 - 21 to 2023 - 24 | 15.4% | 14.3% | 35.8% | 19.7% | 16.5% |

Source: EIA • Created with Datawrapper

Percentage figures for, all households, households of color, and households with children remained high in their inability to pay their energy bill, at least one month in the last year.

The largest increase was from households with children, which went from 21.91 percent to 22.49 percent.

Percent of Households Unable to Pay Energy Bill

House was unable to pay an energy bill or unable to pay the full bill amount, at least one month in the last year

| Time Period | National Average | Low- and Moderate-Income (<\$50k) | Households with Children | Households of Color |
|----------------------|------------------|-----------------------------------|--------------------------|---------------------|
| Oct 5 - Oct 17 2022 | 17.2% | 36.5% | 21.9% | 22.1% |
| Oct 18 - Oct 30 2023 | 17.3% | 35.9% | 22.5% | 22.4% |

Table: NEADA • Source: Census Pulse Survey • Created with Datawrapper

The percentage of households that keep their home at unsafe temperatures is down across all categories.

Low and moderate income households had the largest decrease with a 2.26 percentage point decrease.

Percent of Households Keeping Home at Unsafe Temperature to Save Money on Energy Bill, by Survey Period

Household kept home at a temperature that felt unsafe or unhealthy, at least one month in the last year

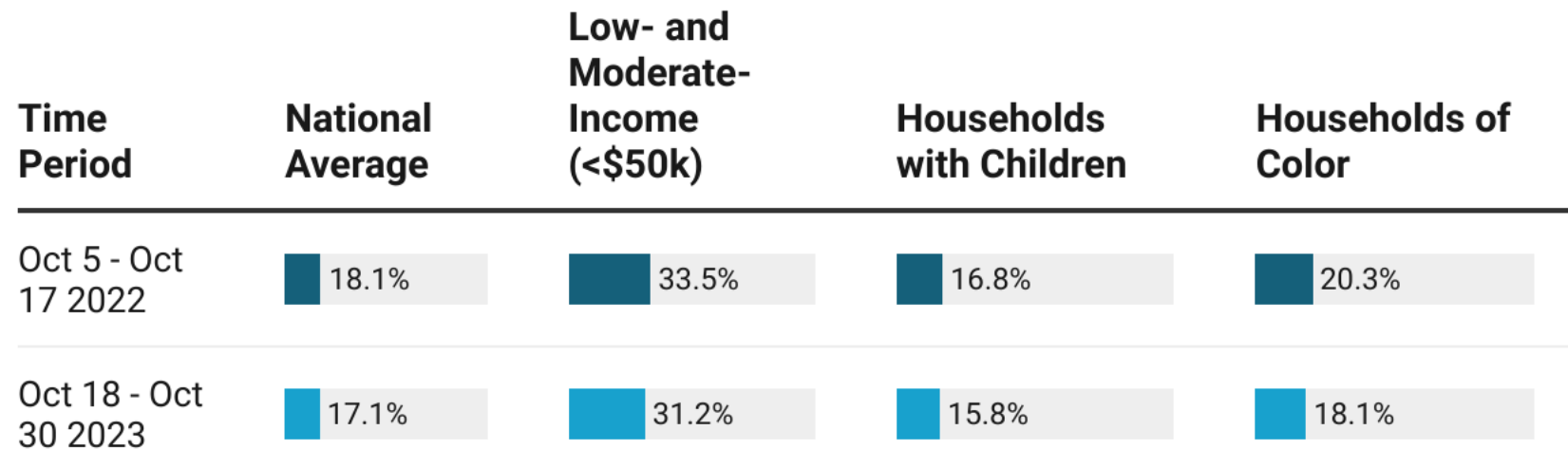


Table: NEADA • Source: Census Pulse Survey • Created with Datawrapper

This chart shows increases in energy insecurity across various demographics as measured by a household foregoing necessities to pay their energy bills.

There are small increases across all household groups.

Percent of Households Foregoing Basic Necessities to Pay Energy Bills, by Survey Period

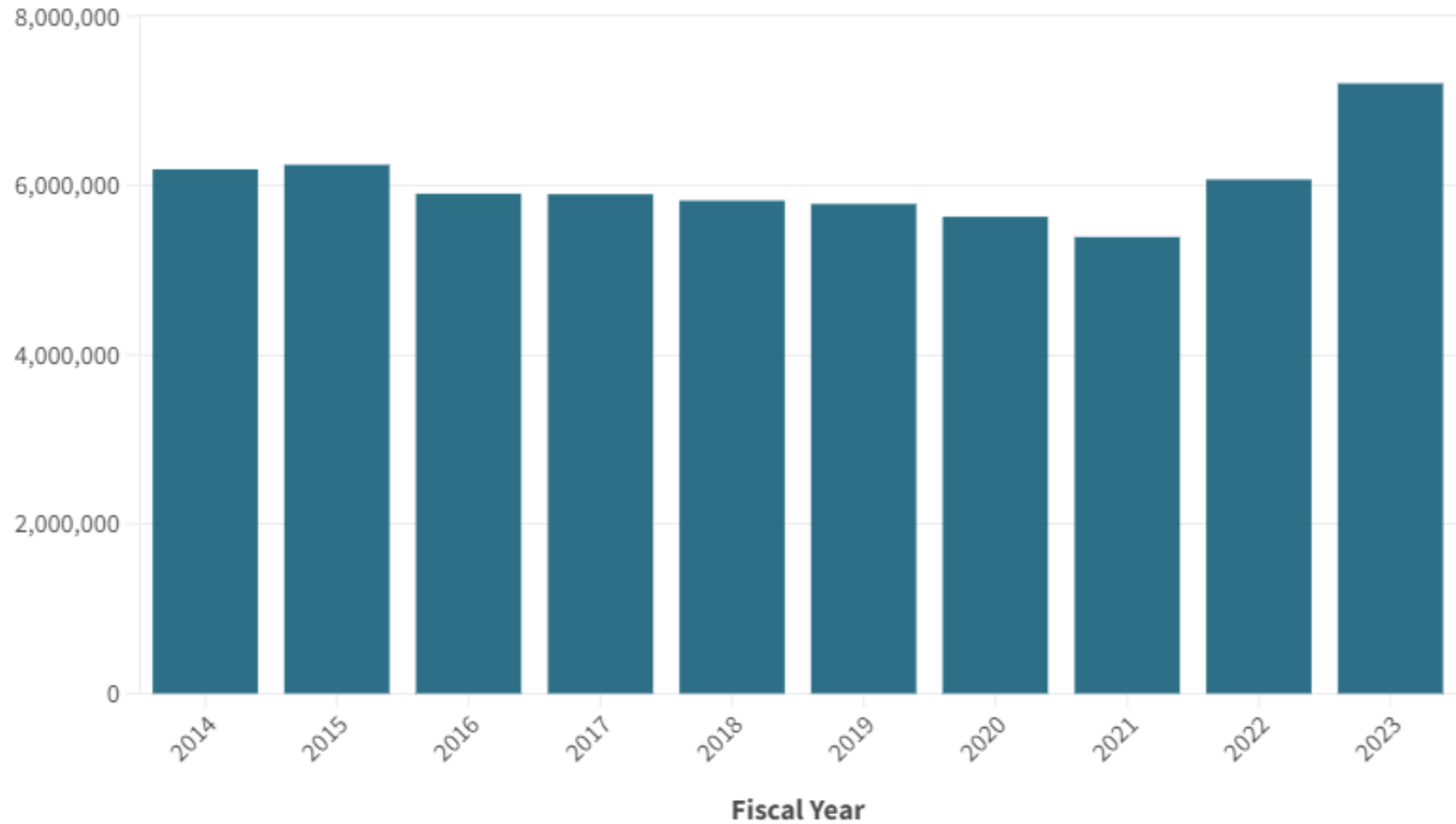
Household reduced or forewent expenses for basic household necessities, such as medicine or food, in order to pay an energy bill, at least one month in the last year

| Time Period | National Average | Low- and Moderate-Income (<\$50k) | Households with Children | Households of Color |
|----------------------|------------------|-----------------------------------|--------------------------|---------------------|
| Oct 5 - Oct 17 2022 | 26.7% | 50.7% | 29.8% | 31.0% |
| Oct 18 - Oct 30 2023 | 26.7% | 51.5% | 29.9% | 31.5% |

Table: NEADA • Source: Census Pulse Survey • Created with Datawrapper

Household Receiving LIHEAP Assistance FY 2014 - FY 2023

LIHEAP Households



LIHEAP households assisted is estimated to have peaked in FY 2023 with an estimated 7.2 million households.

If federal funding stays at current levels and assistance payments remain similar NEADA estimates 5.7 million households will be assisted.

Source: LIHEAP Datawarehouse • 2023 Households are Estimated

As of December 2023, both natural gas and electric arrears are forecasted to be at record highs.

About 21.2 million households (1 out of 6) are estimated to be under utility arrears.

Natural Gas - Residential National Arrearage Estimates

| | Percent Households in Arrears | Estimated Total Households in Arrears | Average Amount Owed | Estimated Natural Gas Arrearages |
|--------|-------------------------------|---------------------------------------|---------------------|----------------------------------|
| 23-Dec | 17.9% | 14.3M | \$406 | \$5.8B |
| 22-Dec | 17.4% | 13.9M | \$351 | \$4.9B |

Source: Utility Arrearage Reports • Created with Datawrapper

Electricity - Residential National Arrearage Estimates

| | Percent Households in Arrears | Estimated Total Households in Arrears | Average Amount Owed | Estimated Electric Arrearages |
|--------|-------------------------------|---------------------------------------|---------------------|-------------------------------|
| 23-Dec | 16.2% | 21.2M | \$684 | \$14.5B |
| 22-Dec | 15.3% | 20.1M | \$642 | \$12.9B |

Source: Utility Arrearage Reports • Created with Datawrapper

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Climate Change and Rising Temperatures: Strategies to Protect Vulnerable Utility Customers



National
Consumer Law
Center
*Fighting Together
for Economic Justice*

Karen Lusson,
Senior Attorney
National Consumer Law
Center
February 13, 2023

National Consumer Law Center (NCLC)

- Since 1969, the nonprofit National Consumer Law Center® (NCLC) has used its expertise in consumer law and energy policy to work for consumer justice and economic security for low-income and other disadvantaged people, including older adults, in the U.S.

Roadmap

- Extreme Heat and Utility Unaffordability
- What's Needed Now: Implementation of Proactive Policies Addressing Affordability
 - Robust, tiered discount rates or percentage of income payment plans
 - Summer moratorium protections
 - Disconnection protections for vulnerable populations (infants/children 6 and under; seniors, chronically ill and disabled customers)
 - New credit and collection provisions that lock in more flexible, less punitive practices
 - Monthly reporting of disconnections, arrearages, other unaffordability metrics via monthly zip code level data filings
 - Emergency orders invoking disconnection moratoriums

Roadmap

Extreme Heat

**Energy
Unaffordability**

**Practical
Strategies to
Address
Affordability**

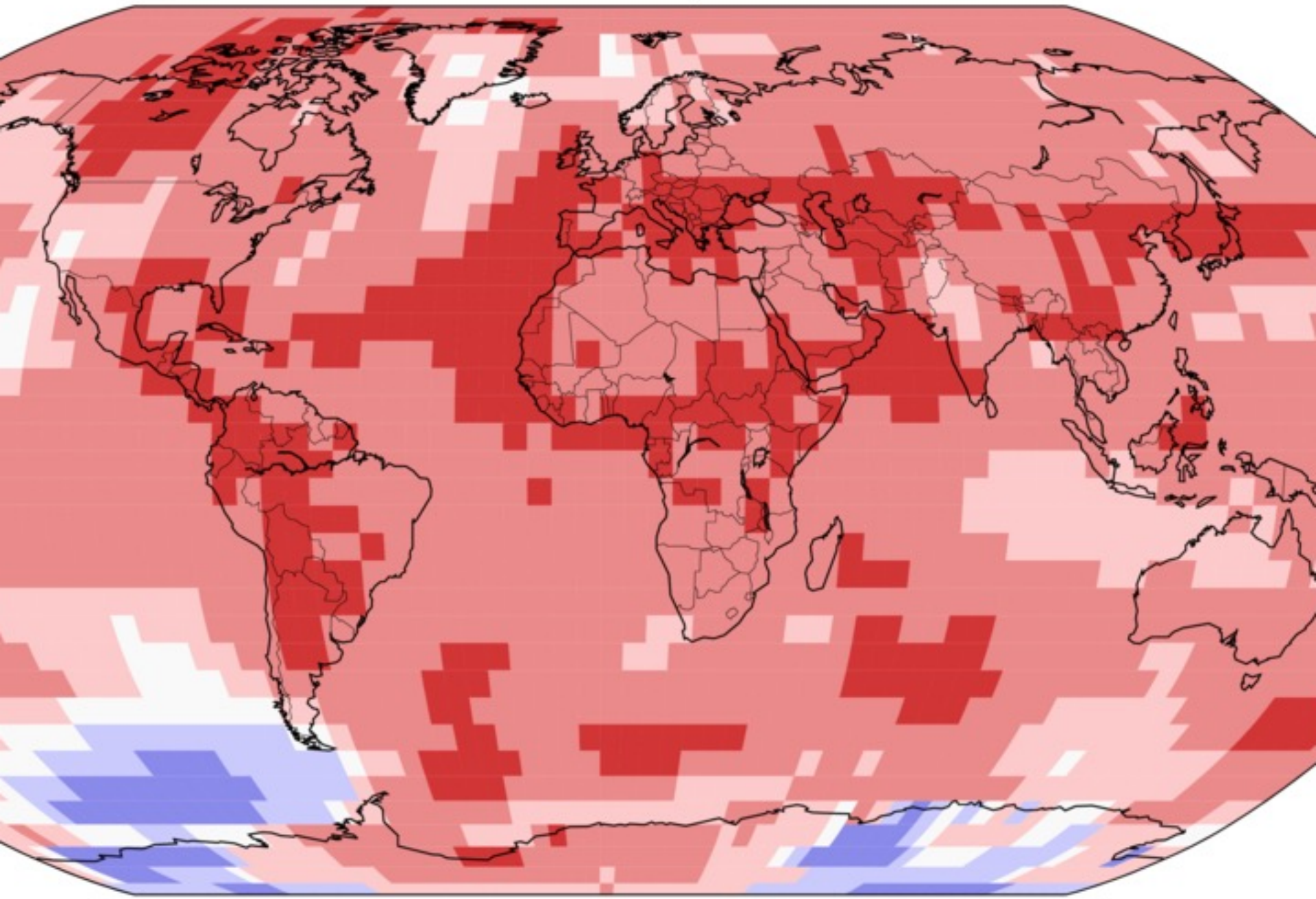
2023: Warmest Year on Record

2023 was the warmest year in a 174-year climate record.

*Declared by The National Oceanic and Atmospheric Administration's ([NOAA](https://www.noaa.gov/))



Data Source: NOAA Global Temp v5.1.0-20240107



Extreme Heat and Weather-Related Deaths

Extreme heat is the leading cause of weather-related deaths

- Nearly a quarter of people in the U.S. are vulnerable to extreme heat.
- According to the Centers for Disease Control and Prevention, between 2018 and 2021, there were 4,681 heat-related deaths
- One estimate pegs the cost of heat events in the U.S. at \$1 billion in excess health care costs each year and if unaddressed, could cost the U.S. economy \$14.5 trillion over the next fifty years.

Dangers Accompanying Increased Heat

2023: Record number of heat-related deaths:

- Maricopa County, Arizona reported nearly 500 heat-related deaths this summer, the region's deadliest year on record. ^①
- Texas Department of State Health Services reported 334 people died from heat-related causes in the state -- more than double the number recorded in 2011. ^②
- In 1995, more than 700 Chicagoans died due to extreme heat in a single week. ^③

Urban Heat Islands

Heat Islands bring increased heat risk to vulnerable populations by increasing:

1 High all-day temperatures and pollution

2 Energy consumption

3 Utility Bills

Urban Heat Islands: Dangers of Increased Heat

Heat Islands exacerbate heat waves, leaving vulnerable populations at risk for serious illness and death:

Seniors

Risk Factors:

- Poor Health
- Lower Mobility
- Heat Sensitivity

Children

Risk Factors:

- Increased sensitivity to ozone pollution and smog

LMI Populations

Risk Factors:

- Poor housing conditions
- Lack of cooling access

Disabled and Chronically Ill

Risk Factors:

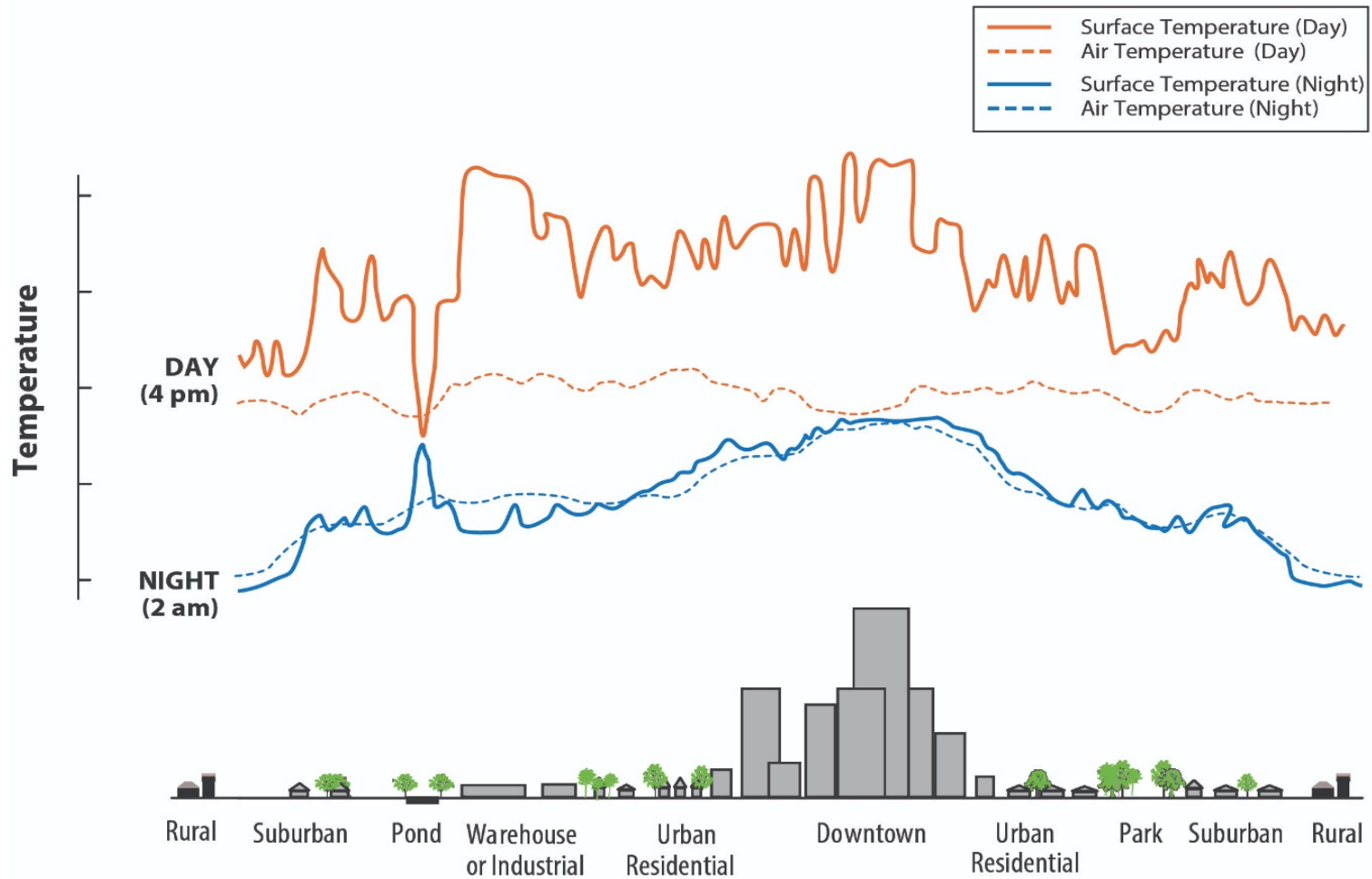
- Mobility constraints
- Diabetes
- Cognitive deficits

Outdoor Workers

Risk Factors:

- prone to heat exhaustion and stroke
- exposure to ozone pollution

Heat Island Effect Diagram



Average Electricity Prices Increasing Across the U.S.

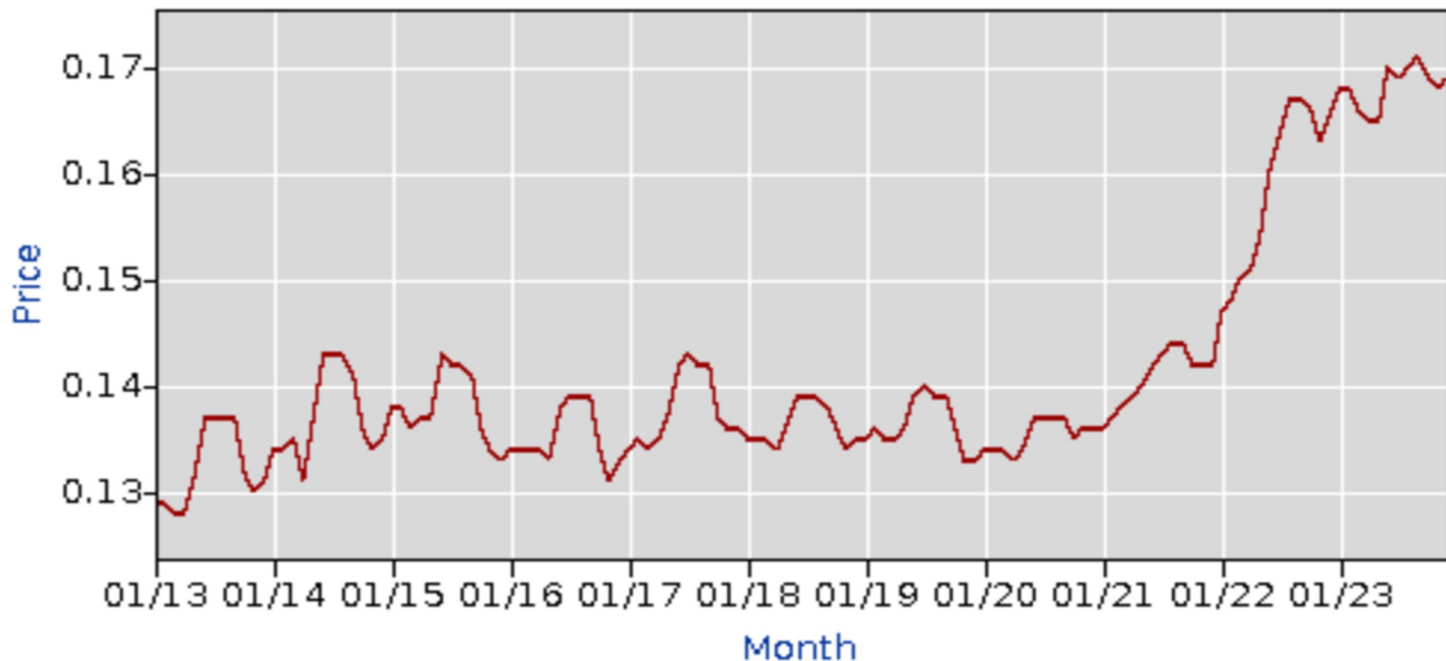
Consumer Price Index Average Price Data

Series Id: APU000072610

Series Title: Electricity per KWH in U.S. city average, average price, not seasonally adjusted

Area: U.S. city average

Item: Electricity per KWH



Energy Burden

- 44% of Americans, or about 50 million people, qualify as low-income and have a disproportionately high energy burden
- As such, the percentage of gross household income they spend on energy is three times higher than it is for non-low-income Americans. “This disparity stands in the way of nationwide energy accessibility and affordability.”

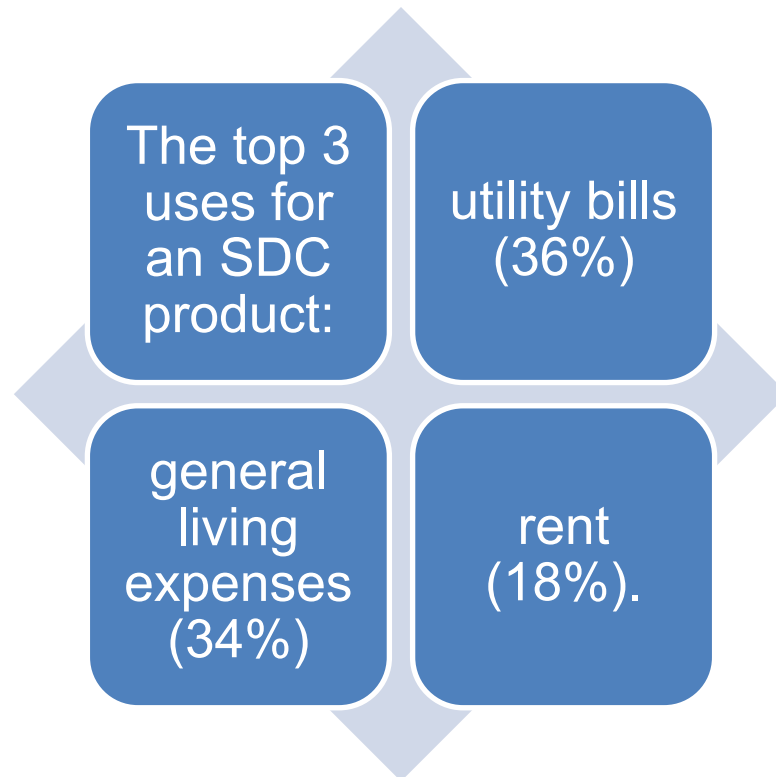
Climate Change Policies can Increase Utility Bills

Utility customers are being asked to subsidize new state clean energy goals and climate change policies through the monthly utility bill.

- State legislators and regulators rely on the utility bills to subsidize the transition away from fossil fuels to renewable energy sources and EV.
- New clean energy policies have placed upward pressure on utility rates, increasing the need for regulatory and public policy additional assistance for low-income customers.

Utility Debt is the No. 1 Reason for Payday Loans

When utility bills become unaffordable, the likelihood that consumers will seek expensive payday loans significantly increases.



Effects of Extreme Heat and Payday Loan Activity

More extreme temperature days in a month increases payday loan demand.

More extreme heat days in a month leads to deteriorating performances of existing payday loans.

Increases in online payday loan inquiries, delinquency, and default rates with decreases in accounts opened and credit issued with more extreme heat days.

Payday loan lenders reduce credit supply during extreme heat days out of concern for an increase in default and delinquency rates.

Practical Strategies to Address Affordability



Proactive monthly bill affordability programs

Percentage of Income Payment Plans (PIPPs)

- **Ohio PIPP:** Gas heat customers pay 5% of gross household income for gas bill, and 5% gross household income for electric bill.
- If electric heat, the monthly payment is 10% of gross household income. The balance of utility bill is subsidized by the state of Ohio. Minimum monthly payment of \$10.00.
- Paying on-time and in-full each month reduces customer's outstanding balance. If 24 on-time and in-full payments made, the outstanding utility arrearage is eliminated.

Other PIPP Programs

- **Illinois PIPP:** Heat and electric bill set at 6% of monthly income, but with benefit cap; currently budget-constrained
- **California PIPP Pilot:** Monthly bill caps based on 4% of monthly income
 - Customers with incomes between 0-100% FPL -- \$37
 - Customers with income 101-200% FPL -- \$109 bill cap

Proactive monthly bill affordability programs

Tiered discount rates

- Percentage discounts should aim for energy burden reduction, similar to PIPPs: e.g., tiered discounts set at 3% energy burden for financially eligible electricity customers and 3% for financially eligible gas customers rates

Illinois Gas Utility Discount Rates, (October 1, 2024)

- **The Peoples Gas Light & Coke Co. discounts (serving City of Chicago):**

- ***Tier 1 (0-50% FPL): 83%***
- ***Tier 2: (50-100% FPL) 68%***
- ***Tier 3: (100-150% FPL) 45%***
- ***Tier 4: (150-200% FPL) 20%***
- ***Tier 5: (200-300% FPL) 5%***

- **The Nicor discounts (serving Northern Illinois suburbs and outer counties):**

- ***Tier 1 (0-50% FPL): 75%***
- ***Tier 2 (50-100% FPL): 55%***
- ***Tier 3 (100-150% FPL): 25%***
- ***Tier 4 (150-200% FPL): 10%***
- ***Tier 5 (200-300% FPL): 5%***

Illinois Gas Utility Discount Rates, (October 1, 2024)

- The Ameren Gas discounts (serving Central and Southern Illinois):
 - *Tier 1 (0-50% FPL): 75%*
 - *Tier 2 (50-100% FPL): 55%*
 - *Tier 3 (100-150% FPL): 25%*
 - *Tier 4 (150-200% FPL): 10%*
 - *Tier 5 (200-300% FPL): 5%*

- The North Shore Gas discounts will be:
 - *Tier 1: (0-50% FPL): 79%*
 - *Tier 2: (50-100% FPL): 68%*
 - *Tier 3: (100-150% FPL): 36%*
 - *Tier 4: (150-200% FPL): 12%*
 - *Tier 5: (200-300% FPL): 5%*

Arrearage Management Programs

Arrearage Management Programs

(AMPs): reduce customer debt by 1/12 for every on-time monthly bill payment

- When accompanied by PIPPs or discounted rates, wipes out customer debt
- Examples: MA AMPs, Illinois PIPP

Vulnerable populations need protection from disconnection

Moratorium on disconnection for vulnerable customers, including:

- Seniors (customers age 60 and older)
- Infants/children (households with children under the age of 6)
- Disabled and chronically ill

Extreme Heat Protections

- Best Practices: Calendar-Based Moratoriums
 - Ex. Arizona June 1 – Oct. 15
 - Lessens the disparate burden on residents in urban heat islands, multifamily housing, housing in poor condition, mobile homes
- In the alternative, if temperature is chosen it is preferable to use heat index to account for humidity
- Most effective if part of a comprehensive set of affordability and disconnection protections

Arizona Weather-Related Disconnection Regulation

A. Restrictions on termination of service. . . .

11. A utility shall adopt only one of the following conditions under which it shall not terminate residential service:

a. During any period for which the local weather forecast, as predicted by the National Weather Service, indicates that the weather in the customer's service address:

i. Will include temperatures that do not exceed 32° F;

ii. Will include temperatures that exceed 95° F; or

iii. Will include other weather conditions that the Commission has determined, by order, are especially dangerous to health; or

b. During the calendar days of June 1 through October 15 of each year, which shall be specified as non-termination dates in a utility's tariffs.

Emerging heat-related moratorium strategies

220 ILCS 5/8-205(b):

If gas or electricity is used as the only source of space cooling or to control or operate the only space cooling equipment at a residence, then a utility may not terminate gas or electric utility service to a residential user, including all tenants of master metered apartment buildings, for nonpayment of bills:

(1) on any day when the National Weather Service forecast for following 24 hours covering the area of the utility in which the residence is located includes a forecast that the temperature will be 90 degrees Fahrenheit or above;

(2) on any day preceding a holiday or weekend where National Weather Service for the following 24 hours covering the area of the utility in which the residence is located includes a forecast that the temperature will be 90 degrees Fahrenheit or above during the holiday or weekend; or

(3) when National Weather Service issues an excessive heat watch, heat advisory, or excessive heat warning covering the area of the utility in which the residence is located.

Emergency Disconnection Moratorium Orders

- California enacted a model emergency disconnection moratorium (and other protections) order post wildfires that the Commission now can re-issue when needed to address public health and safety concerns that arise, including during extreme weather events.
- *“We recognize the need for prompt Commission consideration of disaster preparedness and disaster relief as California experiences the harsh effects of climate change, which increases the probability and severity of disasters like wildfires.”*
- *“The aim of this decision is to provide continuity and support to customers during times of crisis by establishing interim, minimum disaster relief emergency protocols and protections to assist customers with recovery from indiscriminate harm.”*

Vulnerable Customers Need Year-round Protections

Certain populations are more vulnerable to heat-related illnesses/death.

- Moratoriums on disconnections of LIHEAP-designated “priority” households:

Infants (MA)

Children 6 and
under (LIHEAP
priority
households)

Seniors (MA)

Disabled
customers

Change in Current Utility Collections Procedures

- Disconnections of ComEd customers increased by 170% from 2013-2019.
- Ameren disconnections increased by 79% between 2013 and 2019.
- The monthly data reported to the IL Commission shows high Deferred Payment Arrangement (DPA) default rates, more than 30% to 44% for the big four utilities as reported last month.

Impact of Unaffordable Utility Services

- Who most frequently bears the hammer of disconnection?
- Zip code data reveal that Black and Brown/environmental justice communities are disproportionately impacted.

Disparate impacts of disconnection policies -- ComEd

- There is a striking overlap between race and service disconnections.
- ComEd: Among the 20 zip codes with the highest disconnections ratio, 13 were among the top 20 zip codes with the highest non-white populations.*
- 16 of the 20 zip codes cited fall within Environmental Justice Communities and all 20 fall within the state's definition of Equity Investment Communities.**
- Relevant data point: Only 14.7% of Illinois' population is Black; Latiné or Hispanic population is 18.0%. (60% white) (<https://www.census.gov/quickfacts/IL>)

Case in Point: What Illinois Zip-Code-Level Data Reveals

- Tufts University analysis of zip-code-level disconnection data, 2013-2020*:
 - Controlling for income distribution and other demographics, customers in non-white neighborhoods were four to five times more likely to have their power disconnected, both in normal times and during the COVID-19 pandemic.
 - During the COVID-19 pandemic, there was a 9X expansion in low-income assistance to pay utility bills, but disconnections were double and deferred payment plans triple their historical averages in October 2020. About 20% of all accounts were charged late fees. The odds for each of these measures were multiples higher in non-white zip codes.
- How to change these outcomes? Significant change in disconnection practices is needed – now and in future.

**The incidence of extreme economic stress: Evidence from utility disconnections, S. Cicala, Tufts University, June 28, 2021.*

Disconnections, Arrearages, and Unaffordability Reporting

- Monthly zip-code level data filed by all electric, gas, water/sewer utilities
- IL: (220 ILCS 5/8-201.10) Requires monthly reporting of data, including customer numbers, disconnection notices, disconnections, existing DPAs, new DPAs, failed DPAs, reconnections, deposits, late fees, arrearages past 30 days, number of customers in arrears
- Broken down by customers class, including total residential and low-income subset

In a nutshell...



Promoting Continued Access to Essential Utility Services

Strategies:

- **Robust, tiered discount rates or PIPPs** for eligible customers that keep energy burden at no higher than 6% of monthly income for heat and electricity.
- **Summer moratorium protections** to incorporate heat index assessments and non-voluntary winter disconnection moratoria
- **Year-round disconnection protections for vulnerable populations** (infants/children 6 and under; seniors, chronically ill and disabled customers)
- **New credit and collection provisions** that lock in more flexible, less punitive practices:
 - End discriminatory risk-ranking
 - Longer deferred payment arrangements (DPAs) that assess customer's ability to pay monthly bill
 - Improve medical certification rules (Does the provision address the realities of illness in terms of the length of the protection? Does it provide certification access to a variety of health care providers?)
 - No disconnections of customers waiting to hear on LIHEAP applications
- **Monthly reporting of disconnections, arrearages, other unaffordability metrics** via monthly zip code level data filings
- **Emergency orders invoking disconnection moratoriums**

Citations

Slide 5:

1. <https://www.maricopa.gov/ArchiveCenter/ViewFile/Item/5722>
2. <https://www.texastribune.org/2024/01/12/texas-heat-deaths-2023-record-climate-change/>
3. See *Cooked: Survival by Zip Code*, J. Helfand, <https://www.pbs.org/independentlens/documentaries/cooked-survival-by-zip-code/#:~:text=About%20the%20Documentary&text=Cooked%3A%20Survival%20by%20Zip%20Code%20tells%20the%20story%20of%20this,%2C%20elderly%2C%20and%20African%20American.>

Slide 6:

Source: Kaiser Family Foundation website: *Continued Rises in Extreme Heat and Implications for Health Disparities*, N. Ndugga, S. Artiga, August 24, 2023; see <https://www.kff.org/racial-equity-and-health-policy/issue-brief/continued-rises-in-extreme-heat-and-implications-for-health-disparities/>

Slide 7:

See Kaiser Family Foundation website: *Continued Rises in Extreme Heat and Implications for Health Disparities*, N. Ndugga, S. Artiga, August 24, 2023; see <https://www.kff.org/racial-equity-and-health-policy/issue-brief/continued-rises-in-extreme-heat-and-implications-for-health-disparities/>

Slide 8:

1. <https://www.maricopa.gov/ArchiveCenter/ViewFile/Item/5722>
2. <https://www.texastribune.org/2024/01/12/texas-heat-deaths-2023-record-climate-change/>
3. See *Cooked: Survival by Zip Code*, J. Helfand, <https://www.pbs.org/independentlens/documentaries/cooked-survival-by-zip-code/#:~:text=About%20the%20Documentary&text=Cooked%3A%20Survival%20by%20Zip%20Code%20tells%20the%20story%20of%20this,%2C%20elderly%2C%20and%20African%20American.>

Slide 9:

See <https://www.epa.gov/heatislands>
<https://www.epa.gov/heatislands/heat-island-impacts>

Citations

Slide 10:

Source: U.S. EPA; <https://www.epa.gov/heatislands/lheat-island-impacts>

Heat Island Impacts:

- Maxwell, K., S. Julius, A. Grambsch, A. Kosmal, L. Larson, and N. Sonti. 2018. [Built environment, urban systems, and cities](#). In *Impacts, Risks, and Adaptation in the United States: Fourth National Climate Assessment, Volume II* [Reidmiller, D.R., C.W. Avery, D.R. Easterling, K.E. Kunkel, K.L.M. Lewis, T.K. Maycock, and B.C. Stewart (eds.)]. U.S. Global Change Research Program, Washington, DC. pp. 438–478.
- Zamuda, C., D.E. Bilello, G. Conzelmann, E. Mecray, A. Satsangi, V. Tidwell, and B.J. Walker. 2018. [Energy supply, delivery, and demand](#). In *Impacts, Risks, and Adaptation in the United States: Fourth National Climate Assessment, Volume II* [Reidmiller, D.R., C.W. Avery, D.R. Easterling, K.E. Kunkel, K.L.M. Lewis, T.K. Maycock, and B.C. Stewart (eds.)]. U.S. Global Change Research Program, Washington, DC. pp. 174–201.

Vulnerable populations:

- Gamble, J.L., B. J. Hurley, P.A. Schultz, W.S. Jaglom, N. Krishnan, and M. Harris. 2013. [Climate Change and Older Americans: State of the Science](#). *Environmental Health Perspectives* 121(1): 15-22.

U.S. Climate Change Science Program. 2008. [Analyses of the effects of global change on human health and welfare and human systems](#). A Report by the U.S. Climate Change Science Program and the Subcommittee on Global Change Research. [Gamble, J.L. (ed.), K.L. Ebi, F.G. Sussman, T.J. Wilbanks (Authors)]. U.S. Environmental Protection Agency, Washington, DC, USA.

Vaidyanathan, A., J. Malilay, P. Schramm, and S. Saha. 2020. [Heat-related deaths — United States, 2004–2018](#). *Morbidity and Mortality Weekly Report* 69(24):729–734.

Slide 12:

Source: U.S. Bureau of Labor Statistics, data extracted January 15, 2024;

See; https://data.bls.gov/timeseries/APU000072610?amp%253bdata_tool=XGtable&output_view=data&include_graphs=true

Citations

Slide 13:

Source: U.S. Dept of Energy, Office of Energy Efficiency and Renewable Energy, available at: <https://www.energy.gov/eere/energy-accessibility-and-affordability>

See also Home Energy Affordability Gap website (R. Colton): <http://www.homeenergyaffordabilitygap.com/index.html>

Slide 15:

Source: *A Complex Portrait: An Examination of Small-Dollar Credit Consumers*, The Center for Financial Services Innovation, Rob Levy, Manager, Innovation and Research, Joshua Sledge, Analyst, Innovation and Research, August 2012, p. 4.

Slide 16:

Source: *Extreme Weather and Low Income Household Finance: Evidence from Payday Loans*, S. Xie, V. Wenxin Xie, X. Zhang, January 8, 2024

Slides 18, 19: (PIPP Programs)

Ohio: <https://development.ohio.gov/individual/energy-assistance/2-percentage-of-income-payment-plan-plus>

Illinois: <https://dceo.illinois.gov/content/dam/soi/en/web/dceo/communityservices/utilitybillassistance/documents/pipp-brochure-2019.pdf>

California: California Public Utilities Commission, Rulemaking 18-07-005, Order of October 7, 2021
<https://docs.cpuc.ca.gov/PublishedDocs/Published/G000/M413/K823/413823568.PDF>

Slide 20: (Discount rates)

WA Util and Trasp. Comm, See, e.g. *Dkt. UE-230560, UE-230539, UG-230551, UG-230739*

Slides 21, 22: (Tiered discount rates)

See Illinois Commerce Commission Docket Nos. 23-0066 (Nicor Gas)

ICC Docket No. 23-0068/0069 (North Shore Gas, Peoples Gas)

ICC Docket No. 23-0067 (Ameren Illinois Gas)

Slide 23:

See *Helping Low-Income Utility Customers Manage Overdue Bills through Arrearage Management Programs (AMP)*, National Consumer Law Center, C. Harak, September 2013; <https://www.nclc.org/wp-content/uploads/2022/09/ampUreportUfinalUsept13.pdf>

Citations

Slide 26:

Ariz. Admin. Code R14-2-211; ACC Docket No. RU-A-19-0132, Decision 78316 (Nov. 9, 2021)

Slide 28: *See Decision Affirming the Provisions of Resolutions M-4833 and M-4835 as Interim Disaster Relief Emergency Customer Protections*, California Public Service Commission Rulemaking 18-03-011, August 20, 2018

Slide 29:

Infant protection: MA – M.G.L. Ch. 164, section 124H

Senior protection: MA – 220 C.M.R. 25.05

Slide 30:

Illinois Commerce Commission Notice of Inquiry, 20-NOI-1, <https://www.icc.illinois.gov/notice-of-inquiry/20noi-01>, ComEd – 20-NOI-01 Initial Comments, Attachment 01.

** *Id.*, Ameren Illinois Company Initial Comments, Appendix A – Attachment 1.

*** For the month of December, 2023, DPA default rates were as follows: ComEd – 33%, Ameren Electric and Gas 44%, Peoples Gas – 30%, Nicor Gas – 48%. See <https://www.icc.illinois.gov/chief-clerk-office/filings/list?sd=638409600000000000&dts=365&ft=2&dt=240&ddf=10128>

Slide 32:

See ICC Docket No. 22-0067, COFI Ex. 1.0 (2nd CORR), pp. 19-20;
<https://www.icc.illinois.gov/docket/P2022-0067/documents/322585>

Questions?

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