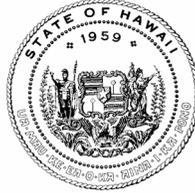


DAVID Y. IGE  
GOVERNOR

JOSH GREEN  
LIEUTENANT GOVERNOR



CATHERINE P. AWAKUNI COLÓN  
DIRECTOR

DEAN NISHINA  
EXECUTIVE DIRECTOR

**STATE OF HAWAII**  
**DIVISION OF CONSUMER ADVOCACY**  
**DEPARTMENT OF COMMERCE AND CONSUMER AFFAIRS**

335 MERCHANT STREET, ROOM 326  
P.O. Box 541  
HONOLULU, HAWAII 96809  
Phone Number: 586-2800  
Fax Number: 586-2780  
[cca.hawaii.gov/dca/](http://cca.hawaii.gov/dca/)

December 9, 2020

The Honorable Chairman and Members of  
the Hawaii Public Utilities Commission  
Kekuanaoa Building  
465 South King Street, Room 103  
Honolulu, Hawaii 96813

Dear Commissioners:

RE Commission Request for Feedback from Utilities and the  
Consumer Advocate on the Suspension of Termination or Disconnection of  
Regulated Utility Services Due to Non-Payment

The Division of Consumer Advocacy (“Consumer Advocate”) received the Commission’s November 25, 2020 Request for Feedback from Utilities and the Consumer Advocate on the Suspension of Termination or Disconnection of Regulated Services Due to Non-Payment (“11/25 Letter”). The Commission’s 11/25 Letter requested feedback and utility information regarding potentially suspending or terminating the COVID-19 pandemic utility moratorium on disconnections due to non-payment. Although the directed questions within the letter largely apply to regulated utilities, the Consumer Advocate provides the following comments and recommendations:

- 1) Extend the moratorium and, if not extended for the duration of the pandemic, the moratorium should be extended for, at a minimum, three more months;
- 2) Require utilities to provide monthly standardized data to assist the Commission in determining next steps regarding appropriate regulatory measures;
- 3) Request each utility to develop plans to address protections and/or measures for customers that may need additional assistance, including exploration of debt forgiveness plans, and to have a customer outreach plan to help customers understand their options; and
- 4) Open a docket to serve as a repository for all the data and filings to promote efficiency and transparency.

The current moratorium, which largely adopted the Consumer Advocate's request for certain forms of ratepayer relief during the ongoing COVID-19 pandemic,<sup>1</sup> established a moratorium on the termination of service due to non-payment and other related actions "during the pendency of the Governor's Emergency Proclamation, and until otherwise ordered by the Commission"<sup>2</sup> and is set to expire on December 31, 2020.<sup>3</sup>

In the Commission's 11/25 Letter, the Commission indicates that, since the moratorium is set to end on December 31, 2020, it "intends to issue an Order addressing suspension of disconnections prior to this date."<sup>4</sup> In the 11/25 Letter, the Commission set forth a number of questions to help the Commission's deliberations on this matter. The Commission set forth four general areas of questions for the utilities: 1) Lifting the suspension of disconnection for non-payment; 2) Financial impacts on utilities; 3) Protections for customers (including those experiencing financial hardship); and 4) Customer engagement.

Even though the Commission did not direct any specific questions to the Consumer Advocate, the Consumer Advocate is offering the following comments within the same general areas identified for the utilities.

### **Lifting the suspension of disconnection for non-payment.**

The Consumer Advocate believes that the Commission should extend the moratorium beyond December 31, 2020. The primary reasons that the Consumer Advocate recommends a further extension is: 1) Hawaii's economy, businesses, and residents are still struggling with the continuing impact of the pandemic and an extension would provide continued relief; 2) the extension would allow the Commission to receive additional information, analyze the data, and determine the next best steps; 3) utilize the additional time to have well-developed customer measures and outreach implemented; and 4) the additional time would also allow additional time for the United States Congress to work on a federal aid package that may provide assistance for utility payments.

---

<sup>1</sup> The Consumer Advocate filed a letter with the Commission on April 23, 2020, urging the Commission to file an order to temporarily suspend the authority of regulated companies to terminate or disconnect services due to non-payment, assess any charges or fees related to late payments, interest on outstanding balances, or similar charges during the ongoing COVID-19 pandemic.

<sup>2</sup> Order No. 37125, at 4.

<sup>3</sup> Order No. 37153 filed on May 28, 2020 extending the moratorium to June 30, 2020; Order No. 37189 filed on June 26, 2020 extending the moratorium to July 31, 2020; Order No. 37251 filed on July 31, 2020 extending the moratorium to August 31, 2020; Order No. 37284 filed on August 24, 2020, extending the moratorium to December 31, 2020.

<sup>4</sup> The Commission's 11/25 Letter, at 2.

Hawaii's unemployment rate is still one of the worst in the country and although the COVID-19 infection rate in Hawaii is lower than most states, the economic recovery and emergency will require a much longer recovery.<sup>5</sup> Although a minority of states still have mandatory statewide COVID related moratoriums in place,<sup>6</sup> 29 states have existing seasonal moratoria protecting customers from disconnections over the winter months.<sup>7</sup> National Energy Assistance Directors Association ("NEADA") estimates that 40% of the US population was still covered by COVID related disconnection moratoriums at the end of October.<sup>8</sup> However, 51% of the population is protected by remaining COVID related moratoria or existing seasonal date-based moratoria. An additional 33% of the population is protected by temperature-based disconnection moratoriums. Additionally, the majority of states have categorical moratoria for households with infants, health or medical need, or are on or negotiating a payment plan.

If the Commission lets the moratorium end in December, Hawaii would reverse course from one of the ten protective states, to one of the ten least protective states. Not only would Hawaii not have a statewide policy on COVID related disconnections, but we would also be one of ten states with no seasonal, winter protections. Most concerning, Hawaii has no other statewide categorical protections.<sup>9</sup>

As already noted, the COVID-19 emergency persists and Hawaii's population is still suffering from extreme levels of unemployment and economic recession. Further, utilities granted authority to use deferred accounting treatment for COVID related expenses to be treated as regulatory assets are requesting extensions,<sup>10</sup> and the Consumer Advocate urges the Commission to consider the need for a balanced approach. If the utilities are going to be allowed extensions to continue tracking COVID related expenses, the Commission should, at a minimum, also assist customers by having

---

<sup>5</sup> <https://www.hawaiipublicradio.org/post/hawaiis-unemployment-rate-ties-third-worst-nation#stream/0>.

<sup>6</sup> See <https://www.naruc.org/compilation-of-covid-19-news-resources/map-of-disconnection-moratoria/>; states include Arkansas, California, District of Columbia, Hawaii, New Hampshire, New Jersey, New Mexico, New York, Virginia, Washington.

<sup>7</sup> <https://liheapch.acf.hhs.gov/Disconnect/disconnect.htm>.

<sup>8</sup> <https://neada.org/wintercovid19moratoriums/>.

<sup>9</sup> This is based on the LIHEAP disconnection webpage, Florida is the only other state that offers no other protections.

<sup>10</sup> See Docket No. 2020-0069, HECO letter to the Commission, filed on December 3, 2020, and Docket No. 2020-0083, Hawaii Gas letter to the Commission, filed on December 4, 2020. In HECO's letter filed in Docket No. 2020-0069, HECO pointed out the persistent effects of the pandemic on customers and that "no one knows or can predict with any certainty when the pandemic and its impact will subside." (at 1)

the moratorium extended.<sup>11</sup> Thus, the Consumer Advocate requests the statewide moratorium on involuntary disconnections be extended for all customers. This is especially important given how little information we have regarding the impacts of COVID-19 on customers and utilities.

In terms of the Commission's question about how much longer the moratorium should be extended, the Consumer Advocate offers that there is a range of possible suggestions, such as until the end of the pandemic. As the Commission is likely aware, the City Council of the City and County of Honolulu ("Council") adopted Resolution 20-183, Urging the Hawaii Public Utilities Commission and the Hawaiian Electric Company, Inc., to Extend the Moratorium on Electric Service Disconnections for Non-Payment for a Reasonable Period of Time After the State has Re-opened to Tourism or the Declaration of the State of Emergency Has Ended. The Consumer Advocate believes that having the moratorium end at the same time that the pandemic is deemed over has merit because it would avoid the need for multiple extension orders and would represent a sound reason why the moratorium should end.

The Consumer Advocate acknowledges, however, that a balance of the utilities' and customers' financial needs will be considered by the Commission. If the termination of the moratorium will not be tied to the end of the pandemic, the Consumer Advocate urges the Commission to adopt clearly established metrics that support when the moratorium will be modified or end so that both customers and utilities are able to understand what to expect and why. For that reason, the Consumer Advocate has concerns with the notion that customers' protections may be limited to whether the applicable utility might choose to voluntarily suspend disconnections. Without clear metrics and parameters, the Consumer Advocate is concerned with the potential confusion and frustration that customers may experience if one of their utility service providers chooses to voluntarily suspend disconnections while another one will not. As will be discussed, however, the Consumer Advocate believes that the Commission could establish different approaches to address the current moratorium but emphasizes that the approaches should be based on sound analysis.

**The Need for Uniform Detailed Information from the Utilities (to help answer the second and third areas of questions).**

Regardless of the length of the extension of the moratorium, one of the most important steps the Commission can take is to require all utilities to provide data for the Commission to support an informed decision about when to end the moratorium and how it could be modified or ended. The Consumer Advocate notes that, besides asking when the moratorium should be lifted, the Commission asked the utilities, in the alternative, for

---

<sup>11</sup> The Consumer Advocate urged the Commission to consider a balanced approach to allowing utilities to continue deferring expenses for possible recovery from consumers and the extension of a moratorium of disconnections for consumers in its November 23, 2020 letter filed in Docket No. 2020-0069.

comments on whether the “suspension should end for certain customer classes before others, and if so, which customers, and when?”<sup>12</sup> The Consumer Advocate believes that data should be provided to support any finding about “when” **and** “why” the protection for certain classes should end. The Consumer Advocate contends that, in order to avoid the possible appearance of discrimination or arbitrariness, the Commission should require the provision of data to help inform any decisions on the end or modifications of the moratorium. Data related to the financial condition of the utilities (the Commission’s second area of questions – Financial Impacts on Utilities) as well as some of the Commission’s questions related to protections for customers (the third area of questions – Protections for Customers Including Those Experiencing Financial Hardship) should be provided and not just comments.

Thus, the Consumer Advocate urges the Commission to require the utilities to provide standardized monthly information for 2020.<sup>13</sup> In addition, whether the Commission extends the moratorium in some form or ends the moratorium, the utilities should continue to provide monthly data throughout the ongoing pandemic until the Commission determines that the data is no longer needed.<sup>14</sup> This will allow the Commission to monitor the status of customers and utilities throughout the pandemic. In addition, the Consumer Advocate requests that the Commission either open a separate docket to house such data or to require that this data be filed in a docketed proceeding.<sup>15</sup> By having the data in a docket, this will facilitate transparency, ease of access, and help the legislature, agencies, and the public to access the data as well and to assist in informed policy decisions.

Consistent with the Consumer Advocate’s recommendations, it should be noted that on October 30, 2020, nine US Senators wrote a letter to Duke Energy that stated, “[i]t is imperative that Congress have access to complete data on the effect of the coronavirus pandemic on utility services provision, in order to protect families and our children’s future. Given the number of utility companies and patchwork of state regulations, collecting complete and accurate data is nearly impossible.”<sup>16</sup> Additionally, the National Consumer Law Center (“NCLC”) states that “[m]ost states do not require electric or gas service

---

<sup>12</sup> 11/25 Letter, at 2.

<sup>13</sup> To be clear, the Consumer Advocate is recommending that monthly data for all of 2020 – not just from November forward – should be provided.

<sup>14</sup> While the Consumer Advocate is recommending that monthly data be provided, the Consumer Advocate defers to the Commission whether such data should be provided on a monthly basis or on a less frequent basis (e.g., quarterly reports that provide the monthly data).

<sup>15</sup> The Consumer Advocate appreciates that the Commission has placed the relevant Commission orders and letters on its website but the Consumer Advocate is concerned about the access to the filings responding to the Commission’s 11/25 Letter as well as any additional data that may be filed by the utility companies. The Consumer Advocate believes that it would be reasonable to have this information readily accessible through the Commission’s document management system.

<sup>16</sup> [https://www.banking.senate.gov/download/letter-to-duke.](https://www.banking.senate.gov/download/letter-to-duke)

providers to report the key data points needed to determine the extent to which residential customers are affordably accessing and retaining essential utility service. Understanding affordability and home energy security challenges that stem not only from utility bills, but also from credit and collection protocols, requires more than raw service disconnection numbers.”<sup>17</sup>

The data requested by the Senate and NCLC includes:

1. Total number of customers;
2. Number of customers charged late payment fees;
3. Number of customers who paid the late fees;
4. Dollar value of late fees billed, paid, or waived;
5. Number of service termination/disconnection notices issued to customers for nonpayment of bills;
6. Number of customers disconnected for nonpayment of bills;
7. Number of service restorations for customers disconnected for nonpayment of bills;
8. Number of customers that became eligible for disconnection due to nonpayment of bills but were not disconnected;
9. Average time in between service disconnection for nonpayment of bills and service restoration;
10. Number of customers in arrears by vintage (30-60 days, 60-90 days, etc.);
11. Total dollar amount and average dollar amount in arrears;
12. Number of accounts and dollar values in arrears by age of arrears (30-60 days, 60-90 days, etc.);
13. Average and median monthly bills and standard monthly usage;
14. Dollar value of level of security deposits collected;
15. Number of security deposits collected;
16. Number of new deferred payment agreements entered into;
17. Average repayment term of new deferred payment agreements;
18. Successfully completed deferred payment agreements;
19. Average repayment term of payment agreements; and
20. A description and utilization statistics on customer assistance programs.

NCLC additionally states that, “Getting a clearer picture requires obtaining monthly data - for both general residential customers and identified low-income residential customers - at a minimum... by zip code.”

In a COVID-19 informational briefing with the Hawaii State House of Representatives on November 24, 2020, Representatives pushed Hawaii Energy to do more to access necessary data from HECO to support customers and prove to the legislature that those most in need were getting support.

---

<sup>17</sup> <http://bit.ly/brief-covid-19-data>.

Currently, the Hawaii Commission requires quarterly COVID related reports from utilities; however, the data received is not uniform and contains so much variation that comparison of both financial and customer impacts across companies and utility sectors is virtually impossible. The Consumer Advocate has included Attachment 1 to illustrate the diversity of the information received. For example, while costs, savings, grants/loans, bad debt should be fairly standard to comply with the Commission's previous orders, some companies are not including this data or merely including percentages rather than actual values. Additionally, financial condition data has ranged from a single line item of percentage of "lost revenues" compared to the previous year, to detailed monthly sales and DSC ratios. Even subsidiaries of the same company are offering different reports between their companies and between quarters.

It is clear that all parties would benefit with more detailed and uniform information. NCLC has supported several state's standardized reporting forms including those used in California,<sup>18</sup> Pennsylvania,<sup>19</sup> Iowa,<sup>20</sup> and Ohio<sup>21</sup> (Ohio's payment plan reporting also Attached). For that reason, the Consumer Advocate urges the Commission to consider requiring all of the above data on a monthly basis. In addition, the relevant customer information should also be provided by customer class. The Consumer Advocate contends that most of the identified data sets should be kept by businesses whether they are large or small; regulated or unregulated. While some of the data may not normally be kept, the Consumer Advocate contends that the identified data, in conjunction with financial data that the utilities should already be filing with the Commission, will be integral in making informed decisions about when to end the moratorium, how to modify and/or end the moratorium, the financial condition of the utilities, and consumer protections. The Consumer Advocate believes that once that data has been provided, the Commission and other stakeholders will be better able to assess some of the following:

- The existing customer accounts receivable ("A/R") balance in arrears (e.g., past due beyond 60 days);
- The number of customer accounts associated with the A/R balance in arrears;
- The number of customers that could, without the moratorium, be disconnected;
- A description of each payment plan offered and the terms for each payment plan;
- The number of customers who have already entered into each available payment plan;
- The relative magnitude of the A/R balance in arrears to the utility's average monthly billings; and

---

<sup>18</sup> [https://www.nclc.org/sce-quarterly-disconnect-report-2018q4\\_excel-version](https://www.nclc.org/sce-quarterly-disconnect-report-2018q4_excel-version).

<sup>19</sup> [http://www.puc.state.pa.us/General/publications\\_reports/pdf/EDC\\_NGDC\\_UniServ\\_Rpt2018.pdf](http://www.puc.state.pa.us/General/publications_reports/pdf/EDC_NGDC_UniServ_Rpt2018.pdf).

<sup>20</sup> <https://www.nclc.org/iowa-moratorium-report-dec-2019>.

<sup>21</sup> Attached but see also <https://www.nclc.org/pipp-metrics-report-template>.

- Based on the above, the Commission will have relevant information to determine, among other things:
  - o whether an extension for a utility is needed (e.g., if a utility has no A/R in arrears, the extension of the moratorium would seem unnecessary);
  - o what a further extension of the moratorium for all customers, or for those that are in arrears or by customer class, might mean to the utilities' financial health;
  - o the type of payment plans (and whether they are sufficient), and other key metrics; and
  - o The type of payment plans or debt forgiveness plans that could be implemented without jeopardizing the utility's financial health.

**The Need for Greater Flexibility in Repayment/Installment Plans, Improved Customer Outreach, and Clearly Communicated Transition Plans (to help answer the third and fourth areas of questions).**

Even with disconnection protections across the United States, it is estimated that small business and residential customers could owe \$35-40 billion in arrearages by the one-year mark of the emergency declarations.<sup>22</sup> At that point, there may be customers who owe an entire year's worth of services. In many cases, even with 18-24 month extended payment plans, repayment may not be feasible whether the customer is a low to middle income family living paycheck to paycheck, an unemployed individual or family, or struggling business. Several states have instituted policies to waive reconnection fees or down payments for payment plans to help transition to payment plans. Some states, like Ohio, have also created repayment plans limiting the amount of arrearage that can be charged per month in the payment plans to a percentage of customer disposable income.<sup>23</sup>

When Arkansas approached the end of their statewide moratorium, the Arkansas Public Service Commission ordered utilities to prepare transition plans, provide data on impacts, and answer questions similar to those discussed in the Hawaii November 25<sup>th</sup> letter.<sup>24</sup> The transition plans were to contain:

---

<sup>22</sup> [https://www.utilitydive.com/news/customers-owe-billions-in-covid-debt-to-their-utilities-and-somebody-has-to/589525/?utm\\_source=Sailthru&utm\\_medium=email&utm\\_campaign=Issue:%202020-12-04%20Utility%20Dive%20Newsletter%20%5Bissue:31233%5D&utm\\_term=Utility%20Dive](https://www.utilitydive.com/news/customers-owe-billions-in-covid-debt-to-their-utilities-and-somebody-has-to/589525/?utm_source=Sailthru&utm_medium=email&utm_campaign=Issue:%202020-12-04%20Utility%20Dive%20Newsletter%20%5Bissue:31233%5D&utm_term=Utility%20Dive).

<sup>23</sup> See <http://www.opae.org/2020/10/06/ohio-utility-covid19-transition-plans/> summary of transition plans and PIPP plans.

<sup>24</sup> See Docket No. 20-012-A, Order No. 9, filed on September 17, 2020.

- a. a discussion of the payment plans that will be in effect once the moratorium is lifted including the length of time that the plans will be offered;
- b. eligibility criteria;
- c. how soon the payment plans would commence after the moratorium is lifted;
- d. any necessary tariff changes;
- e. a detailed customer outreach plan which will inform customers of the delinquent customer's outstanding principal balance;
- f. existence of a payment plan; and
- g. other utility-specific options that will allow a delinquent customer to pay outstanding principal balances, and a way for that customer to connect with a customer service representative of the utility to make payment arrangements.

The Consumer Advocate believes that transition plans and data are sensible next steps to addressing the information gap and finding a prudent way forward that can support both consumers and utilities. The transition plan should inform the Commission where flexibility is needed for utilities based on their capabilities and capacity but also where standardization can streamline the process for transparency and ease of access to consumers. The plans should therefore also be public documents that include such details as: contact methods; outreach timing; payment plan types, length, and terms by customer class; and which customer classes or customer types that qualify for which plans and outreach treatments. Clear and detailed outreach will be imperative to promote early access to repayment plans. The need for outreach that is clear is highlighted by events such as Hawaiian Electric recently closing their in-person customer service centers, where consumers may not be aware of all their options and how they can engage with their utility companies.

In a recent podcast recording called Impact Café,<sup>25</sup> industry representatives discussed that many families in need of assistance from COVID or in transitioning to meet state energy goals may have so many other priorities that typical outreach efforts may not register. They suggested that utilities need to find ways to connect with people who are at home, working or out of work, schooling their children, looking at missing other bills, and have many other heavy priorities. It is a difficult situation to provide successful outreach. The Consumer Advocate believes that an outreach plan is necessary to support consumers in need.

Many families are still struggling in Hawaii whether paying their bills, accessing food, caring for their out of school children, or waiting on unemployment. In this situation, payment plans that are too short and down payments may be overwhelming or unobtainable. Electric, telecommunications, gas, water, and wastewater services are critical to residents and businesses, especially during these times. Without these services, residents and businesses would not be able to endure through the pandemic. Remaining connected is more important than ever however as many children are relying on home electricity and broadband to access public school curricula and for workers to

telework. Similarly, water and wastewater services must continue on an unbated basis so that handwashing guidelines and other tasks, such as cooking, etc. can continue. While there are many customers that are likely continuing to pay bills as they come due, with the ongoing impacts on the economy, it is likely that low income and unemployed customers will not be able to pay ongoing bills. Thus, payment plans will not be a solution if there is no or inadequate income to pay bills. Ending the moratorium at December 31 for customers that are struggling and without a transition plan in place would likely create a rush by customers that may strain utility customer service resources. The result of that would likely frustrate customers and the utilities.

Thus, rather than allowing the moratorium to end and forcing customers to scramble or be forced into payment plans that they would not be able to accommodate anyway, the Consumer Advocate is recommending that the moratorium should be extended to allow the collection of data to further evaluate how the moratorium might be extended – and for which customers – and a transition plan that allows customers who can accommodate a payment plan an orderly process to migrate to the preferred payment plan. The Consumer Advocate anticipates that the time required to collect the data, further develop more payment options and other measures to help low income and/or unemployed customers, develop and roll out an outreach plan to help customers understand their options will take, at a minimum, three months.

The Consumer Advocate also requests that the Commission require the development of forgiveness plans, such as a debt forgiveness or customer balance adjustment plan. The Consumer Advocate believes that a forgiveness plan can serve multiple purposes. A forgiveness plan can be used to help low income and unemployed residential customers and/or commercial customers that might otherwise need to shut down. Instead of allowing the utility to shut off service and decrease the likelihood of recovering outstanding balances from applicable residential and/or commercial customers, a forgiveness plan can be the bridge option to allow recovery of a majority of outstanding balance. A forgiveness plan can also be the means by which a utility can encourage customers to initiate discussions with the utility companies to establish payment plans to encourage compliance with that plan. For instance, the transition plan for a utility could include a forgiveness plan for customers that engage in discussions with the utility company before the end of the moratorium. The forgiveness plan can include the provision where, for each month that the customer makes timely payment consistent with the payment plan, a certain percentage or amount of the outstanding balance would be forgiven.

The Consumer Advocate recognizes that Hawaii utilities vary in terms of the number of customers, number of employees, amount of resources, access to capital, etc. that will need to be considered in structuring an effective forgiveness plan. Based on that, the Consumer Advocate suggests that the Commission consider a forgiveness plan with two tiers, one for the larger utilities such as those that are publicly owned entities or are not facing liquidity and loss concerns and another tier for the remaining entities. A one-size-fits-all approach may be difficult to apply, especially to the smaller water and

wastewater utilities that are not publicly owned, and the Consumer Advocate recommends that consideration be given to creating two tiers.

Currently, utilities covering at least 16 states have already instituted partial debt forgiveness programs. Some utilities have received funds, grants, or tariffs from their state or commission to implement the programs; however, several investor owned utilities have opted to provide investor backed forgiveness programs to customers.<sup>26</sup> While the programs do not offer complete relief, discounted arrearages and waived fees may be able to better assist those most impacted by the pandemic to recover without greater sacrifice. The Consumer Advocate respectfully suggests a forgiveness plan that does not simply recover the costs from other ratepayers. The Consumer Advocate contends that the suggested data will help to assess the utilities' ability to participate in forgiveness plans. As mentioned in other filings, the Consumer Advocate contends that, especially in this situation, there needs to be a sharing of the pain and customers should not be assumed to be the sole source of funding for the utilities' COVID related expenses or forgiveness plans. The Consumer Advocate also points out that delaying the end of the moratorium may give additional time for the US Congress to act on a federal aid package that may be an additional funding source for a forgiveness plan that does not require funding from customers.

Finally, the Consumer Advocate appreciates the Commission's questions regarding customer outreach as there should be a clear and well-defined customer outreach plan in place before the end of the moratorium to maximize the likelihood that all customers are kept informed and the customers who might need assistance the most are given information that they can use to plan around the possible end of the moratorium.

Given all of the above comments, the Consumer Advocate urges the Commission to adopt the following consumer protections:

- Extend the involuntary disconnection moratorium. The Consumer Advocate believes extending the moratorium until the pandemic is deemed over is a reasonable measure. If, however, the data provided by the utilities supports a finding that requiring all utilities to extend the moratorium until the end of the pandemic is not possible or reasonable, the Consumer Advocate recommends that the moratorium should be extended to allow sufficient time for the suggested data to be filed, the data to be analyzed, and transition and outreach plans to be developed and implemented. In this option, the Consumer Advocate believes that the moratorium should be extended at least for three months or for however long it might take to complete all of the recommended measures.

---

<sup>26</sup> See for example Arizona Public Service offered \$8M in shareholder-funded debt forgiveness, <https://www.aps.com/en/About/Our-Company/Newsroom/Articles/APS-extends-hold-on-disconnects-for-past-due-bills-through-2020>, and Ameren Missouri providing \$5M in residential energy assistance, <https://www.ameren.com/account/customer-service/covid-19>.

- Require utilities to report monthly, standard data throughout the pandemic. As discussed, the Consumer Advocate urges the Commission to require the provision of standardized data to answer the questions posed by the Commission as well as the other data needs identified by the Consumer Advocate. The Consumer Advocate also requests that a docket be opened to facilitate transparency and access to such reporting data in order for the state and public to better understand the impacts of COVID-19 and any plans that have been developed based on the data and filings made by the utilities.
- Each utility should be required to develop a transition and outreach plan to be submitted to the Commission.
- Support the development of a framework of a forgiveness plan, where the development of the framework should consider a two-tiered approach recognizing that utilities of different sizes and financial condition and that different forgiveness plans may be appropriate.

We believe these measures will help support consumers to maintain essential utility services to stay safe and healthy during these very uncertain times but also helps the utility companies by encouraging customers that can start to pay – when and what they can pay – to establish payment plans that will help restore the revenues associated with those services. Thank you for your consideration.

Sincerely yours,

/s/ Dean Nishina  
Dean Nishina  
Executive Director

DN:lm

Attachment

Quarterly Financial Report and Regulatory Asset Report Data Received from Hawaii Utilities

Company	Period	Presentation	Costs	A/R	Bad Debt	Reg. Asset	Savings	Loans				ROR/E	Cash	Debt	DSC	Credit	Customer protections
								Grants	Sales	Revenue	Income						
Aqua Puhi	Q2	Chart	x														
Hawaii-American Water Company	Q2	Narrative	x		x												
Hawaii-American Water Company	Q3	Narrative	x														*
Hawaii Gas	Q2	Narrative							*								
Hawaii Gas	Q3	Chart	x	x	x	x	x	x									x
Hawaii Water Service Company	Q2	Chart	x	x	x	x											x
Hawaii Water Service Company	Q3	Chart	x	x	x	x											x
Keauhou Community Services Inc	Q2	Narrative															
Keauhou Community Services Inc	Q3	Narrative															
Kona Water Service Company	Q2	Chart	x	x	x	x											
Kona Water Service Company	Q3	Chart	x	x	x												
West Hawaii Sewer Company	Q2	Chart	x	x	x	x											
West Hawaii Sewer Company	Q3	Chart	x	x	x	x											
West Hawaii Utility Company	Q2	Chart	x	x	x	x											
West Hawaii Utility Company	Q3	Chart	x	x	x	x											
West Hawaii Water Company	Q2	Chart	x	x	x	x											
West Hawaii Water Company	Q3	Chart	x	x	x	x											
Hawaiian Electric Companies	Q2	Narrative	x		x	x			*								
Hawaiian Electric Companies	Q3	Narrative	x		x	x											
Kauai Island Utility Cooperative	Q2	Narrative															
Kauai Island Utility Cooperative	Q3	Narrative															
Sandwich Isles Wireless	Q2	Narrative															
Sandwich Isles Communications	Q2	Narrative															

\* Narrative indicates that the report was summarized in text and may have had some real numbers or merely approximations and percentages rather than substantive data

\*\* Within a cell, (\*) means the term was not given as actual data

\*\*\* Note reporting periods were different for every utility

The following pages are from a standardized reporting excel spreadsheet deployed by the Public Utilities Commission of Ohio in order to analyze the impacts of the Percentage Income Payment Program (PIPP) and Winter Reconnection Orders utilized by utility customers.











# DATA DICTIONARY Submit data based on Revenue Month

## MONTHLY GAS PIPP REPORT

### Enrollment Numbers for Active and Graduate PIPP Programs

<b>A) Number of total residential customer accounts:</b>	Report the number of active residential customer accounts. This number should be the same as what is reported in Line A of the Winter Reconnect Order Report. (#)
<b>B) Number of Total PIPP accounts:</b>	This is the sum of B(1) + B(2), or the sum of active and Grad PIPP accounts. Does not include finalized or inactive accounts. This number should be the same as what is reported on Line B of the Winter Reconnect Order Report. (#)
<b>1) Active, non-Grad PIPP:</b>	Report the number of active, non-Grad PIPP accounts. This should be the same as reported on Line C of the Disconnection-Reconnection Report. (#)
<b>a. New enrollees:</b>	Report the number of customers who are new to PIPP, have not been enrolled within the previous 12 months, and who are active on PIPP at the end of the revenue month. (#)
<b>b. Repeat enrollees:</b>	Report the number of PIPP enrollees who were on PIPP within the previous 12 months, dropped off, have now re-enrolled and are active on PIPP at the end of the revenue month. (#)
<b>2) Graduate PIPP:</b>	Report the number of active Graduate PIPP accounts. This should be the same as Line D on the Disconnect Reconnect Report. (#)
<b>3) Percentage of residential customers on PIPP:</b>	<i>Self-populates. Reports the percentage of residential customers who participate in PIPP, both active and graduate. (%) (Item B divided by item A)</i>
<b>C) Total number of customers dropped from active PIPP enrollment:</b>	<i>Self-populates. C equals the total number of customer accounts that were dropped from active PIPP enrollment. C is the sum of C1 through C5. Includes only active PIPP customers. (#)</i>
<b>1) Non-payment:</b>	Report the total number of Active PIPP customers that were dropped for non-payment during the revenue month. (#)
<b>2) Failure to reverify:</b>	Report the total number of active PIPP customers dropped from enrollment for failure to reverify income within 60 days of the reverification date during the revenue month. (#)
<b>3) Failure to bring account current at anniversary date:</b>	Report the total number of active PIPP customers dropped from enrollment for failure to make up missed PIPP payments within 30 days of anniversary date during the revenue month. (#)
<b>4) Income ineligible:</b>	Report the total number of active PIPP customers dropped from enrollment due to income ineligibility during the revenue month. (#)
<b>5) Other:</b>	Report the total number of customers who were dropped from the Active PIPP for any reason, other than C (1) thru C (4) during the revenue month. (#)
<b>D) Total number of customers dropped from graduate PIPP enrollment:</b>	<i>Self-populates. D equals the total number of customer accounts that were dropped from graduate PIPP enrollment. D is the sum of D1 through D4. (#)</i>
<b>1) Non-payment:</b>	Report the total number of Grad PIPP customers that were dropped for non-payment during the revenue month. (#)
<b>2) Completed 12 month graduate PIPP program :</b>	Report the total number of customers who were dropped from Grad PIPP after 12 months, but continue to have an accrued arrearage. (#)
<b>a. Successfully completed graduate PIPP:</b>	Report the number of customers who successfully completed grad PIPP during the revenue month. (#)
<b>3) Failure to bring account current upon enrollment:</b>	Report the total number of customers enrolled on Grad PIPP who were dropped for failure to bring their PIPP account current within the 30 day grace period during the revenue month. (#)
<b>4) Other:</b>	Total Number of customers who were dropped from the Grad PIPP program for any reason, other than D (1) -(3) during the revenue month. (#)

### Billing & Payment Amounts for Active PIPP Customers

<b>E) Total Billings for Active PIPP Accounts (based on usage):</b>	Report the total dollar amount of the current bills for Active PIPP customers. Do not report on billings for Grad PIPP customers. (\$)
<b>1) Average Total PIPP Bill:</b>	<i>Self-populates. Reflects total billings for active PIPP customers (\$) divided by the number of active PIPP customers. It is reflective of the average total bill received by an active PIPP customer. (#) E divided by B (1).</i>

<p><b>F) Total PIPP payments received:</b> <i>Self-populates. This category reflects the total dollar value of payments made by active PIPP customers or payments made on behalf of active PIPP customers. (\$)</i> Sum of F (1) through F (3).</p>
<p><b>1) Customer payments:</b> Report the cumulative dollar amount of payments received directly from active PIPP customers. It includes payments by agencies (other than ODOD) on behalf of the customers. (\$)</p>
<p><b>2) E-HEAP payments:</b> Report the dollar amount of payments received via E-HEAP. (\$)</p>
<p><b>3) HEAP payments:</b> Report the dollar amount of payments received via HEAP. (\$)</p>
<p><b>G) Unrecovered portion of Active PIPP bill:</b> <i>Self-populates. Reflects PIPP Billings minus PIPP payments. (\$)</i> E minus F.</p>
<p><b>1) Percentage of total billings paid by Active PIPP customers:</b> <i>Self-populates. This shows what percent of total billings were paid. (%)</i> F divided by E.</p>
<p><b>H) PIPP Installments Billings:</b> Report the cumulative total dollar amount of installment billings for active PIPP customers. (\$)</p>
<p><b>1) Average PIPP installment:</b> <i>Self-populates. This is the average PIPP installment amount. (\$)</i> H divided by (B) 1</p>
<p><b>2) Percentage of Installment Billings Paid by Active PIPP Customers:</b> <i>Self-populates. This is the amount of installment payments received divided by the amount of installment payments billed for active customers. (%)</i> F (1) divided by H</p>
<p><b>Payments Received and Incentive Credits Awarded</b></p>
<p><b>I) Number of PIPP installment payments received:</b> <i>Self-populates. Reflects the number of individual payments received from active and graduate PIPP customers. (#)</i> Sum of I (1) and I (2)</p>
<p><b>1) Active:</b> Report the number of installment payments received from active PIPP customers. If customer makes multiple payments to cover one PIPP installment, count as one PIPP installment. (#) In the WRO months, this count will not include customers using the WRO that month.</p>
<p><b>2) Graduate:</b> Report the number of installment payments received from graduate PIPP customers. (#)</p>
<p><b>3) Percentage of active PIPP installment payments received:</b> <i>Self-populates. This is number of active PIPP installments received divided by all active PIPP installments billed. (%)</i> I (1) divided by B (1).</p>
<p><b>4) Percentage of Grad PIPP installment payments received:</b> <i>Self-populates. This is the number of grad PIPP installments received divided by all grad PIPP installments sent. (%)</i> I (2) divided by B (2)</p>
<p><b>J) Number of timely and full PIPP installment payments received:</b> <i>Self-populates. This is the sum of active and graduate installment payments received that are timely and full. Sum of J (1) and J (2) (#)</i></p>
<p><b>1) Active:</b> Report the number of timely and full installment payments received from active PIPP customers. (#)</p>
<p><b>2) Graduate:</b> Report the number of timely and full installment payments received from Grad PIPP customers. (#)</p>
<p><b>3) Percentage of active PIPP installments that are timely and in full:</b> <i>Self-populates. This is timely and full active PIPP installments received divided by all active PIPP installments received. J (1) divided by I (1) (%)</i></p>
<p><b>4) Percentage of Grad PIPP installments that are timely and in full:</b> <i>Self-populates. This is timely and full Grad PIPP installments received divided by all grad PIPP installments received. J (2) divided by I (2) (%)</i></p>
<p><b>K) Total dollars of on-time payment incentive credits awarded:</b> <i>Self-populates. This is the sum of active and graduate dollars of K1 plus K2. It is the cumulative total dollar amount of payment incentive/arrearage forgiveness awarded. This is the amount of debt/arrearage forgiven due to on-time, full installment payments. It includes amounts forgiven towards arrearages as well as the portion of bills not covered by installment amounts. (\$)</i></p>
<p><b>1) Active:</b> Report the total dollar amount of incentive credits/arrearage forgiveness awarded to active PIPP customers. (\$)</p>
<p><b>2) Graduate:</b> Report the total dollar amount of incentive credits/arrearage forgiveness awarded to Grad PIPP customers. (\$)</p>
<p><b>3) Average active credit:</b> <i>Self-populates. This is the total dollars awarded to active PIPP customers divided by the number of timely and full installment payments made by active PIPP customers. K (1) divided by I (1) (%)</i></p>
<p><b>4) Average graduate credit:</b> <i>Self-populates. This is the total of credits awarded to Grad PIPP customers divided by the total number of timely and full installment payments received from Grad PIPP customers. K (2) divided by I (2) (%)</i></p>

<b>Usage</b>
<b>L) Average monthly Mcf usage of PIPP customer:</b> Report the average usage by PIPP customers, both active and graduate, by Mcf. (#)
<b>M) Average monthly Mcf usage of non-PIPP residential customer:</b> Report the usage of the average non-PIPP residential customer, by Mcf. (#)
<b>Aged/Deferred Recoverable through PIPP rider</b>
<b>N) Beginning balance of aged PIPP arrearages:</b> Report the balance of aged PIPP arrearages at the end of the revenue month. This should be the same as Q from the previous month's report. (\$)
<b>O) Aged/Deferred current month's PIPP arrearage:</b> Report the balance of aged PIPP arrearages at the end of the revenue month. (\$)
1) Number of months held prior to aging: Report the number of months your company keeps unpaid billings before sending them for recovery through the PIPP rider. (#)
2) Administrative Costs (if applicable): Report the amount of fees paid to ODOD for administration of PIPP, if applicable. (\$)
3) Revenue Sharing (if applicable): Report the amount of dollars going to reduce the month's PIP arrearages located in (O). This should be reflected as a negative amount. Only populate if applicable to your company. (-\$)
4) Carrying charges (if applicable): Report the amount of carrying charges on deferred PIPP balances that goes to increase the current month's PIPP arrearages. Report only if applicable to your company. (\$)
<b>P) Arrearage recovery/PIPP rider:</b> Report the amount of recovery your company billed for the revenue month through the PIPP rider. (\$)
<b>Q) Ending balance of PIPP arrearages:</b> Report the ending balance of PIPP arrearages at the end of the revenue month. Notwithstanding certain exceptions, this should be calculated as the beginning balance, plus the aged/deferred current month's PIPP arrearage, minus the arrearage recovery/PIPP rider. (N + O - P = Q) (\$)
<b>R) Monthly volumes applicable to PIPP rider/Mcf:</b> Report the monthly volumes applicable to the PIPP rider, by Mcf. (#)
<b>S) Approved PIPP rider rate in effect:</b> Report the approved PIPP rider in effect at the end of the revenue month. Staff recognizes that R X S may not = P. (\$)
<b>DISCONNECTION for NON-PAYMENT / RECONNECTION / DEPOSIT REPORT</b>
<b>A) Number of Non-PIPP Residential Customer Accounts:</b> Report number of residential accounts (excluding PIPP and grad PIPP). This should be the same as reported on Line A of the Payment Plan Success Report. (#)
1) <b>Number of disconnections for non-payment:</b> Report the number of disconnections for non-payment to non-PIPP, residential accounts. (#)
2) <b>Number of reconnections:</b> Report the number of reconnections to non-PIPP, residential accounts. A reconnection is any residential account that was terminated for non-payment and subsequently restored after meeting the utility's terms for restoration. (#)
3) <b>Disconnection rate: Self populates. This is the % of all customers disconnected for non-payment during the revenue month. (% A (1) divided by A</b>
4) <b>Ratio of reconnections to disconnections: Self populates. This is the ratio that shows the % of disconnected customers who reconnected during the revenue month. (% A (2) divided by A (1)</b>
<b>B) Number of Non-PIPP Customers on Payment Plans:</b> Report total number of residential customers on payment plans (excluding PIPP). (#)
1) <b>Number of disconnections for non-payment:</b> Report total number of customers who were on a payment plan within two previous billing cycles of disconnection for non-payment. (#)
2) <b>Number of reconnections:</b> Report number of customers that were reconnected during the revenue month. (#)

3) <i>Disconnection rate: Self populates. This is the % of customers on payment plans disconnected during the revenue month. (%) B (1) divided by B</i>
4) <i>Ratio of reconnections to disconnections: Self populates. This is the ratio that shows the % of disconnected customers (on payment plans) who reconnected during the revenue month. (%) B (2) divided by B (1)</i>
<b>C) Number of Customers on Active, Non-Grad PIPP:</b> Report total number of active, non-Grad PIPP accounts. This should be the same as reported on Line B(1) of the Gas PIPP Report. (#)
1) <b>Number of disconnections for non-payment:</b> Report total number of active PIPP (non-Grad) customer accounts disconnected for non-payment. (#)
2) <b>Number of reconnections: Report number of customers that were reconnected during the revenue month. (#)</b>
3) <i>Disconnection rate: Self populates. This is the % of active, non-Grad PIPP customers disconnected during the revenue month. (%) C (1) divided by C</i>
4) <i>Ratio of reconnections to disconnections: Self populates. This is the ratio that shows the % of active, non-Grad, disconnected PIPP customers who reconnected during the revenue month. (%) C (2) divided by C (1)</i>
<b>D) Number of Customers on Graduate PIPP:</b> Report total number of Graduate PIPP customer accounts. This should be the same as reported on Line B(2) of the Gas PIPP Report. (#)
1) <b>Number of disconnections for non-payment:</b> Report total number of Graduate PIPP customer accounts disconnected for non-payment. (#)
2) <b>Number of reconnections: Report number of customers that were reconnected during the revenue month. (#)</b>
3) <i>Disconnection rate: Self populates. This is the % of Grad PIPP customers disconnected during the revenue month. (%) D (1) divided by (D)</i>
4) <i>Ratio of reconnection to disconnections: Self populates. This is the ratio that shows the % of disconnected Grad PIPP customers to those Grad PIPP customers who reconnected during the revenue month. (%) D (2) divided by D (1)</i>
<b>Length of Time Before Disconnection for Non-Payment Occurred</b>
<b>Non-PIPP disconnections for non-payment by age of default</b>
<b>E) Number of Non-PIPP disconnections:</b> Report the number of non-PIPP accounts that defaulted and were disconnected. (#)
1) <b>Number with the oldest defaulted amount equaling 90 days or less:</b> Report the number of non-PIPP disconnections where the oldest defaulted amount was 90 days old or less. (#)
2) <b>Number with the oldest defaulted amount between 91 and 180 days old:</b> Report the number of non-PIPP disconnections where the oldest defaulted amount was between 91 and 180 days old. (#)
3) <b>Number with oldest defaulted amount equaling 181 days or more:</b> Report the number of non-PIPP disconnections where the oldest default amount was 181 days old or more. (#)
4) <i>% of oldest arrearages that are 90 days old or less: Self-populates. Reports the % of non-PIPP customers whose oldest debt was 90 days old or less (%) I (1) divided by I</i>
5) <i>% of oldest arrearages between 91 and 180 days old: Self-populates. Reports the % of non-PIPP customers disconnected whose oldest debt was between 91 and 180 days old. (%) I (2) divided by I</i>
6) <i>% of oldest arrearages that are 181 days old or more : Self populates. Reports the % of non-PIPP customers disconnected whose oldest debt was 181 days old or more (%) I (3) divided by I</i>
<b>PIPP (Active and Grad) disconnections for non-payment by age of default</b>
<b>F) Number of PIPP and Grad PIPP disconnections:</b> Report the number of PIPP and Grad PIPP accounts that defaulted and were disconnected. (#)
1) <b>Number with oldest defaulted amount 90 days or less:</b> Report the number of PIPP accounts that were disconnected where the oldest debt was 90 days old or less. (#)
2) <b>Number with oldest defaulted amount between 91 and 180 days old:</b> Report the number of PIPP disconnections where the oldest defaulted amount was between 91 and 180 days old. (#)
3) <b>Number with oldest defaulted amount equaling 181 days or more:</b> Report number of PIPP accounts disconnected where oldest defaulted amount was outstanding 181 or more. (#)
4) <i>% of oldest arrearages that are 90 days old or less: Self populates. Reports the % of PIPP customers disconnected whose oldest debt was 90 days old or less (%) J (1) divided by J</i>
5) <i>% of oldest arrearages between 91 and 180 days old: Self-populates. Reports the % of PIPP customers disconnected whose oldest debt was between 91 and 180 days old. (%) J (2) divided by J</i>

6) % of oldest arrearages that are 181 days old or more: Self-populates. Reports the % of PIPP customers disconnected whose oldest debt was 181 days old or more (%) J (3) divided by J
<b>Customer Deposits</b>
G) Number of customer deposits assessed: Report the number of customers assessed a deposit during the revenue month. (#)
H) Total dollar amount of all deposits assessed: Report the total dollar amount of all the deposits assessed during the revenue month. If the deposit is being billed in installments, only report the full deposit amount one time, during the revenue month that it is assessed. (\$) 1) Average Deposit Amount: Self-populates: This is the average deposit amount. H divided by G.
<b>Length of Time Without Service at Reconnection</b>
I) Number of customers disconnected for 10 days or fewer: Report the number of customers who were disconnected for 10 days or fewer. (#)
J) Number of customers disconnected for 11-30 days: Report the number of customers who were disconnected for 11-30 days. (#)
K) Number of customers disconnected for 31-90 days: Report the number of customers who were disconnected for 31-90 days. (#)
L) Number of customers disconnected for 91 days or more: Report the number who were disconnected for 91 days or more. (#)
<b>EXTENDED PAYMENT PLAN SUCCESS &amp; USE OF MEDICAL CERTIFICATES REPORT</b>
<b>Extended Payment Plans</b>
A) Number of Non-PIPP residential customers: Report the number of residential accounts (excluding PIPP and Grad PIPP). This should be the same as reported on Line A of the Disconnect-Reconnect Report. (#)
B) Number of customers on payment plans: Self-populates. Reports the total number of accounts on the 1/3, 1/6, 1/9, or other utility agreed upon payment plan (excludes PIPP accounts). Based on number of residential accounts on payment plans on the last day of revenue month. Should be the same as Line D of the Winter Reconnect Order, during applicable months. (#) Sum of B (1) through B (5)
1) 1/3 plan: Report, based on the last day of the revenue month, the total number of accounts currently on the 1/3 payment plan. (#)
2) 1/6 plan: Report, based on the last day of the revenue month, the total number of accounts currently on the 1/6 payment plan. (#)
3) 1/9 plan: Report, based on the last day of the revenue month, the total number of accounts currently on the 1/9 payment plan. (#)
4) Budget plan: Report, based on the last day of the revenue month, the total number of accounts currently on the budget payment plan. (#)
5) Other plan: Report, based on the last day of the revenue month, the total number of accounts currently on a utility agreed upon payment plan (do not include payment date extensions). (#)
6) % of customers on a payment plan: Self-populates. Of all residential customers, this is the % who are a payment plan. (%) B divided by A
7) % of all customers on 1/3 plan: Self-populates. Of all customers on a payment plan, this is the % on the 1/3 plan. (%) B (1) divided by B
8) % of all customers on 1/6 plan: Self-populates. Of all customers on a payment plan, this is the % on the 1/6 plan. (%) B(2) divided by B
9) % of all customers on 1/9 plan: Self-populates. Of all customers on a payment plan, this is the % on the 1/9 plan. (%) B (3) divided by B
10) % of all customers on budget plan: Self-populates. Of all customers on a payment plan, this is the % on the budget plan. (%) B (4) divided by B
11) % of all customers on other plan: Self-populates. Of all customers on a payment plan, this is the % of customers on a plan other than 1/3, 1/6, 1/9, or budget. (%) B (5) divided by B
12) Total Amount of Arrearages for customers on Extended Payment Plans: Report, based on the last day of the revenue month, the total amount of payment plan arrearages (do not include accounts with a payment date extension). (\$)
<b>Extended Payment Plans and Disconnections for Non-Payment</b>
C) Number of residential customers disconnected for non-payment: Report total number of residential accounts disconnected for non-payment during the revenue month (#).
D) Number of extended payment plan customers disconnected for non-payment: Self-populates. Of the total number disconnected, number of residential accounts on payment plans prior to (within two billing cycles) disconnection. (exclude PIPP and Graduate PIPP.) Sum of D1-4. (#)

<b>1) 1/3 plan:</b> Of the total number disconnected, report number of residential accounts on 1/3 payment plan prior to (within two billing cycles) disconnection. Use number disconnected during the revenue month. (#)
<b>2) 1/6 plan:</b> Of the total number disconnected, report number of residential accounts on 1/6 payment plan prior to (within two billing cycles) disconnection. Use number disconnected during the revenue month. (#)
<b>3) 1/9 plan:</b> Of the total number disconnected, report number of residential accounts on 1/9 payment plan prior to (within two billing cycles) disconnection. Use number disconnected during the revenue month. (#)
<b>4) Other plan:</b> Of the total number disconnected, report number of residential accounts on a payment plan other than the 1/3, 1/6 or 1/9 prior to disconnection (within two billing cycles). Use number disconnected during the revenue month. (#)
<b>5) % of 1/3 plan customers disconnected:</b> <i>Self populates. Of all customers on a payment plan at the time of disconnection this is the % who were on the 1/3 plan. (% D (1) divided by D</i>
<b>6) % of 1/6 plan customers disconnected:</b> <i>Self populates. Of all customers on a payment plan at the time of disconnection this is the % who were on a 1/6 plan. (% D (2) divided by D</i>
<b>7) % of 1/9 plan customers disconnected:</b> <i>Self populates. Of all customers on a payment plan at the time of disconnection this is the % who were on a 1/9 plan. (% D (3) divided by D</i>
<b>8) % of customers on other plan disconnected:</b> <i>Self populates. Of all customers on a payment plan at the time of disconnection this is the % of customers on a plan other than the 1/3, 1/6 or 1/9 plans. (% D (4) divided by D</i>
<b>Extended Payment Plans and Switching/Completion / Switching = Customers changing plans within the revenue month</b>
<b>E) Number of customers switching to an alternate payment plan:</b> Report total number of customer who switched from one payment plan to another payment plan. Use the number of customers switching to an alternate plan during the revenue month. (#)
<b>1) Percentage of customers on a payment plan who switched to an alternate plan:</b> <i>Self populates. This is the % of customers who switched plans. (% E divided by B</i>
<b>2) Switching off 1/3:</b> Report number of customers on 1/3 plan who switched to another payment plan. (#)
<b>3) Switching off 1/6:</b> Report number of customers on 1/6 plan who switched to another payment plan. (#)
<b>4) Switching off 1/9:</b> Report number of customers on 1/9 plan who switched to another payment plan. (#)
<b>5) Switching off other plan:</b> Report number of customers on utility agreed upon payment plan who switched to another plan. (#)
<b>6) % switching off 1/3 plan:</b> <i>Self populates. This is the % of customers on 1/3 plan who switched to another plan. (% E (2) divided by E</i>
<b>7) % switching off 1/6 plan:</b> <i>Self populates. This is the % of customers on 1/6 plan who switched to another plan. (% E (3) divided by E</i>
<b>8) % switching off 1/9 plan:</b> <i>Self populates. This is the % of customers on 1/9 plan who switched to another plan. (% E (4) divided by E</i>
<b>9) % switching off other plan:</b> <i>Self populates. This is the % of customers on a utility agreed upon plan who switched to another plan. (% E (5) divided by E</i>
<b>F) Number of customers completing or meeting terms of payment plan:</b> <i>Self populates. This is the total number of customers who completed or met the terms of a payment plan. (#) Sum of F(2) through F (5)</i>
<b>1) Percentage of payment plan customers completing or meeting terms of payment plan:</b> <i>Self populates. This is the % of customers who completed or met the terms of a payment plan. (%)</i>
<b>2) Meeting terms of 1/3:</b> Report number of customers who met terms of 1/3 plan throughout the Winter Heating Season (this should only be entered when the season ends.) (#)
<b>3) Completing 1/6:</b> Report number of customers who paid all required 1/6 payments to bring account current. (#)
<b>4) Meeting terms of 1/9:</b> Report number of customers who paid all required 1/9 payments to bring account current. (#)
<b>5) Completing other plan:</b> Report number of customers who paid all required payments to bring account current. (#)
<b>6) % meeting terms of 1/3 plan:</b> <i>Self populates. This is the % of customers on 1/3 plan who met terms of the plan. (% F (2) divided by B (1)</i>
<b>7) % completing 1/6 plan:</b> <i>Self populates. This is the % of customers on 1/6 plan who completed the plan. (% F (3) divided by B (2)</i>
<b>8) % meeting terms 1/9 plan:</b> <i>Self populates. This is the % of customers on 1/9 plan who met the terms of the plan. (% F (4) divided by B (3)</i>
<b>9) % completing other plan:</b> <i>Self populates. This is the % of customers on a utility agreed upon plan who completed the plan. (% F (5) divided by B (5)</i>
<b>Medical Certification</b>
<b>G) Number of all residential customers using medical certificate:</b> Report, based on the last day of the revenue month, number of medical certificates used by residential customers. (#)
<b>H) Number of PIPP customers using medical certificate:</b> <i>Self populates. This is the number of all PIPP customers using a medical certificate. (#) Sum of H (1) and H (2)</i>

1) <b>Active PIPP:</b> Report number of medical certificates used by Active PIPP customers. Use number of active med certs on the last day of the revenue month. (#)
2) <b>Graduate PIPP:</b> Report number of medical certificates used by Graduate or Post-PIPP customers. Use number of active med certs on the last day of the revenue month. (#)
<b>WINTER RECONNECT ORDER REPORT</b>
<b>Customer Profile of WRO Use</b>
<b>A) Number of Total Residential Customer Accounts:</b> Report each individually billed account under a unique residential account number and residential tariff rate. (Count the number of residential bills you issue.) This should be the same as line A of the Gas PIPP report. (#)
<b>B) Number of Total PIPP Accounts:</b> Report the number of total PIPP accounts, both active and graduate. This should be the same as Line B of the Gas PIPP Report. (#)
<b>C) Number of non-PIPP Accounts:</b> Self-populates. <i>This is the number of residential customer accounts minus the number of PIPP accounts. A-B=C. (#)</i>
<b>D) Number of customers on extended payment plans:</b> Report the number of customers on an extended payment plans (exclude PIPP accounts). This is based on the last day of reporting and should be the same as reported on Line B of the Payment Plan Success Report. (#)
<b>E) Total number of residential customer accounts that used WRO:</b> Self-populates. <i>Total of PIPP customers plus non-PIPP customers using the WRO. F+G=E. (#)</i> 1) % residential customers using WRO: Self-populates. <i>Out of all residential customer accounts, this is the % that used the WRO. (%)</i>
<b>F) Number of PIPP customer accounts that used WRO:</b> Report total number of PIPP customers (including repeat enrollees & Grad PIPP) who used the WRO. (#) 1) % PIPP customers using WRO: Self-populates. <i>Out of all PIPP customers, this is the % that used the WRO. (%)</i>
<b>G) Number of non-PIPP customer accounts that used WRO:</b> Report the total of non-PIPP customers who used the WRO. (#) 1) % non-PIPP customers using the WRO: Self-populates. <i>Out of all non-PIPP customers, this is the % who used the WRO. (%)</i>
<b>H) Number of Non-PIPP customer accounts that used WRO and received E-HEAP:</b> Report the number of customers who used the WRO and received the \$175 EHEAP benefit. (#)
<b>I) Number of customers on extended payment plans that used the WRO:</b> Report the number of customers who were on the 1/3, 1/6 1/9 or other extended payment plan prior to using the WRO (within the revenue month). (#) (Some companies will report zero which remove customers from payment plans upon default.) 1) % of customers on extended payment plans that used the WRO: Of all customers on extended payment plans, this is the % that used the WRO. <i>This is D/I. (%)</i>
<b>Reasons for WRO Use</b>
<b>J) PIPP Customer Accounts that used WRO:</b> Self populates. <i>This is the total of PIPP customers who used the WRO. This is the same as (F) above. (#)</i> 1) Avoid disconnection: Report total number of PIPP customers who used the WRO to avoid disconnection. (#) 2) Re-establish service: Report total number of PIPP customers who used the WRO to re-establish service. (#) 3) % used to avoid disconnection: Self-populates. <i>Of all PIPP customers who used the WRO, this is the % who used it to avoid disconnection. (%)</i> 4) % used to re-establish service: Self populates. <i>Of all PIPP customers who used the WRO, this is the % who used it to re-establish service. (%)</i>
<b>K) Non-PIPP Customer Accounts that used WRO:</b> Self populates. <i>This is the total of non-PIPP customers who used the WRO. This is the same as (G), above. (#)</i> 1) Avoid disconnection: Report total number of non-PIPP customers who used the WRO to avoid disconnection. (#) 2) Re-establish service: Report total number of non-PIPP customers who used the WRO to re-establish service. (#) 3) Establish service: Report number of non-PIPP customers who used WRO to establish service. (#) 4) % Using to avoid disconnection: Self populates. <i>Of all non-PIPP customers using the WRO, this % used it to avoid disconnection. (%)</i> 5) % Using to re-establish service: Self populates. <i>Of all non-PIPP customers using the WRO, this % used it to re-establish service. (%)</i>

<b>Enrollment on PIPP or Extended Payment Plan Upon WRO Use</b>
<b>L) Number of customers placed on extended payment plan within 30 days of invoking use of the WRO. (#)</b>
<b>M) Number of customers newly enrolled in PIPP within 30 days of invoking use of the WRO. (#)</b>
<b>Arrearage Balance of WRO Use</b>
<b>N) Non-PIPP Only: The payment plan dollar amount entered into as a result of the WRO: Report the dollar amount non-PIPP customers owe after the \$175 has been paid. This is the total amount due on the payment plan arrangements. (\$)</b>
<b>O) PIPP Only: The dollar amount added to PIPP Arrearage: Report the total dollar amount outstanding after the \$175 has been paid for PIPP customers. This is the total amount added to customers' PIPP arrearages. (\$)</b>
<b>Length of Time Without Service Upon WRO Use</b>
<b>P) Number of customers disconnected for 10 days or less: Of the customers who used the WRO, report the number who were disconnected for 10 days or fewer. (#)</b>
<b>Q) Number of customers disconnected for 11-30 days: Of the customers who used the WRO, report the number of customers who were disconnected for 11-30 days. (#)</b>
<b>R) Number of customers disconnected for 31-90 days: Of the customers who used the WRO, report the number of customers who were disconnected for 31-90 days. (#)</b>
<b>S) Number of customers disconnected for 91 days or more: Of the customers who used the WRO, report the number who were disconnected for 91 days or more. (#)</b>

FILED

2020 Dec 09 PM 16:04

PUBLIC UTILITIES  
COMMISSION

The foregoing document was electronically filed with the State of Hawaii Public Utilities Commission's Document Management System (DMS).