

May 12, 2020

Illinois Commerce Commission:

We thank you for the steps you have taken thus far to protect the health and safety of Illinois residents during this global pandemic. As members and allies of the [Illinois Energy Efficiency For All \(IL EEFA\) coalition](#), we submit these comments to urge additional action to protect Illinois families during and in the recovery period following the COVID-19 pandemic. IL EEFA's work focuses on making affordable housing healthy, affordable, and energy efficient in Illinois. For the past six years, the coalition has collaborated on work in the affordable housing, financing, utility, regulatory, state agency, clean energy advocacy, energy efficiency, health, environmental justice, and low-income advocacy arenas.

We are concerned about Illinois residents whose access to essential utility services have been impacted by the COVID-19 crisis. Prior to this pandemic, many Illinois families were living with the burden of water, electric, and/or gas service shut-offs due to an inability to pay already. Now we are seeing a widespread loss of jobs and wages across the state. As a result, the number of residents who can no longer afford utility payments is growing. Access to these utility services is essential to the containment of the virus and the protection of our communities, such as running water for handwashing and a healthy, safe home to shelter in.

The ICC's emergency interim orders were a critical, important step in ensuring Illinois residents have access to essential electric, gas, water and sewage utilities services during the crisis. The Orders paused disconnections and in-person marketing from alternative energy suppliers. We're also encouraged by many of the initial actions individual utilities have taken to protect customers. Now, additional steps should be taken to continue to protect Illinois residents as this crisis continues and in the recovery period following, especially within the state's under-resourced black and brown communities. We know that this crisis affects vulnerable Illinois communities more than others. According to [a study just released by Harvard's Center for Population of Development Studies](#) that looked at Illinois COVID-19 cases by zip code, "the highest rates of COVID-19 confirmed cases were observed among the most disadvantaged compared to most advantaged categories of % poverty, Index of Concentration at the Extremes, % crowding, and % population of color". We urge you to extend and expand current utility protections, in order to ensure that all Illinois residents have robust protections during and following this pandemic.

In order to begin correcting the inequities that exist, we urge the ICC to start by adopting the following protections and priorities, along with recommendations from consumer and low-income groups in [Docket No. 20-0309](#), to help to ensure that no Illinois family has to face uncertainty about access to essential energy and water services as a result of this crisis:

- 1. Extend the moratorium on utility disconnections**

Extend the current moratorium on disconnections for at least 60 days from the end of the public health emergency. It is important to actively work to prevent any spikes in shutoffs and shutoffs notices that would likely occur with the current deadline. This extension should also include a continued prohibition on disconnection notices, and any late fees or penalties for nonpayment during the moratorium period.

**2. Require no-cost, safe reconnections**

Require no-cost, safe reconnections of all households currently disconnected due to an inability to pay from electric, gas, and water services immediately. We are also concerned that the onus is placed on shut-off households to call and request reconnection. We therefore encourage that utilities review shut-off records and make every effort to reach all those households that might still be occupied.

**3. Extend flexible credit and collection policies**

Extend flexible credit and debit collection policies during this crisis and following. This should include a suspension of credit and debit collection for existing low-income households and households affected financially and/or medically by COVID-19, at least during the crisis. Additionally, set up arrearage and bill forgiveness programs and expanded payment plans for the recovery period following the crisis for the above households. Payment plans for persons self-certifying as experiencing financial hardship should be based on a customer's ability to pay, include default payment terms of no less than 24 months with no down payments required, and be renegotiable.

**4. Expand energy assistance access and eligibility**

Expand access to energy assistance by allowing eligibility through the following methods - self certification of hardships, the use of proxy qualifiers by the customer to the utility, cross eligibility with other low-income/hardship programs, and enabling online enrollment. Utilities should be directed to increase customer outreach and education to inform customers about all methods of help with their bills - LIHEAP, other forms of energy assistance and aid, and energy efficiency programs. Utilities should consider requiring people to opt-out of the programs instead of opting in. Utilities should also be encouraged to explore opportunities to expand bill assistance programs, including the creation of discount rates and arrearage management programs that write-off arrearages for consistent payment, and a summer assistance program to help during the cooling season.

**5. Increase credit and collections data requirements and reporting**

Utilities should be required to increase their tracking and reporting of credit and collections related data, by zip code, including the number of disconnections, duration and frequency of disconnections, number of reconnections, uncollectibles, number of payment arrangements, number of payment arrangement defaults, and the number of revised payment arrangements. This data collection will be important to examine the effectiveness of credit and collections practices, whether black and brown communities are being disproportionately impacted by unaffordability of essential utility services and could be helpful in understanding additional impacts of energy assistance and energy efficiency programs.

**6. Prioritize energy efficiency and workforce continuity**

The energy efficiency sector, like all other sectors of the economy, has experienced severe disruption. According to the [Clean Jobs America 2020 report](#), more than 106,000 clean energy workers lost their jobs in the month of March alone, 69,800 in the energy efficiency industry specifically. Existing state energy efficiency stakeholder groups should virtually discuss energy efficiency and workforce continuity plans. Participation should be inclusive and open to all interested parties. This process should help to create continuity within energy efficiency, weatherization and assistance programs, particularly for those who serve low-income residents. This process should also ensure continuity of program dollars flowing to workers and agencies administering and delivering programs. It will be important to have a plan in place to continue energy efficiency work where safely possible during the crisis, and to jumpstart this critical work once the state of emergency has ended. In the meantime, workers should be supported through training, development opportunities, and virtual work wherever possible. Address these

recommendations within this docket as appropriate, and in other relevant dockets and forums.

**7. Prioritize the remediation of unhealthy housing**

Ensure the remediation of unhealthy housing in light of the higher impacts of extended time in the home under the state's stay-at-home order. Utilities should prioritize emergency home health and safety and energy efficiency repairs when it's safe to enter homes, whenever possible during the crisis and in the recovery period following. Services to remediate severe mold, lead, pest management, and temperature control issues should be addressed to reduce the prevalence of respiratory illness that can exacerbate COVID-19 outcomes. Address these recommendations within this docket as appropriate, and in other relevant dockets and forums.

**8. Establish clear communications about new policies**

Establish clear communications about new ICC and utility policies and programs. It is vital for communities to be aware of the resources in place to assist them during this emergency. Information and resources should be made available in multiple languages and accessible to persons with disabilities.

We thank you for the actions that the ICC has taken to respond to this unprecedented health and economic emergency. As you continue to work to address the crisis, we urge you to focus heavily on those most vulnerable and to ensure that all Illinois residents have access to vital utility services to protect themselves and their families.

Sincerely,

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