

Maryland Office of People's Counsel

Energy Services Pilot

Background

During the 2015 Maryland General Assembly session, Chairman Middleton and Senator Benson of the Senate Finance Committee requested that OPC, Cindy Carter (Cancer Support Foundation), the Public Service Commission and Maryland utilities¹ meet with Committee members to address concerns about assisting medically vulnerable customers with continuation and restoration of utility services, especially during the winter.

At the meeting, Ms. Carter presented her concerns about current utility practices. OPC provided its perspective, and requested that utilities consider automatic extensions and restorations of service for 30 days, to allow clients to seek assistance for their pending service terminations and service shut-offs.

While there was disagreement over the issue of service extensions and restorations, the utilities in attendance did offer to coordinate with OPC to arrive at a reasonable solution, and the Senators requested that the Companies cooperate with OPC to try to reach some common ground.

BGE Critical Needs Pilot Program

Subsequent to that meeting, OPC, in partnership with the Cancer Support Foundation (CSF), has focused its attention on the development of a pilot program in the BGE service territory. The purpose is to develop and test protocols for (1) the identification of medically vulnerable customers in danger of losing utility service, or who have lost service, (2) the maintenance or restoration of service to customers with critical medical needs, and (3) an efficient process for applying for and obtaining funds to ensure maintenance of service.

OPC and CSF have worked with BGE and other public and private agencies to develop a process to assist with these objectives. Over the past several months, we have worked together to establish a pilot program with navigators from medical services (primarily cancer centers) and hospitals, as well as OHEP and local energy assistance agency programs.

Energy assistance funding is provided through a number of resources: OHEP's EUSP and MEAP, Department of Social Services (DSS) emergency programs and Office on Aging programs. The assistance is offered through teams of agency management personnel, who expedite funding for the critical needs clients with serious medical problems. As of this date, navigators from medical services and hospitals include, but are not limited to, the following:

¹ BGE, Pepco, Delmarva Power, Potomac Edison Company and SMECO attended the meeting.

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MD Oncology
Union MedStar
Montgomery Medstar
Mercy
St Joes
Anne Arundel Medical
Johns Hopkins Bayview
St Agnes
University of Md
GBMC
Meal on Wheels
Franklin Square
Franklin Square Breast Center
Northwest
Image Center
DHMH State Cancer Control Center
Upper Chesapeake
Bel Air
Johns Hopkins
BWMC
Union Hospital of Cecil County
University of Maryland's Evelyn Jordan Center
Sinai

Baltimore County, Baltimore City, Harford County , Carroll County, Howard, Anne Arundel and Montgomery County have management teams in place at their OHEP, DSS and Aging Offices to coordinate resources as well as appropriate application assistance.

On-Service Customers. BGE has been willing to provide 30 day extensions for on-service customers who simply notify the Company that they have a critical medical need. BGE then withdraws customers' accounts from termination status, sends customers a PSC Medical Certification Form and issues a new termination notice after the initial 30 day extension if customers' accounts are not addressed with a full payment or payment plan. This BGE protocol exceeds current COMAR regulations, which only require that certification forms be provided *before* an extension is issued. As a practical matter, the Pilot extension assistance results in

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customers receiving approximately an additional 60 days before actual service termination². This voluntary process has been of assistance to a number of customers.

Off-service customers. BGE has also been willing to respond, through a navigator processing system, within twenty four (24) hours, to assist with immediate restoration of critically ill customers identified through the Pilot program. The service restorations, however, require presentation of a reasonable financial assistance plan, as well as a statement identifying the customer as being critically ill. The restoral assistance is helpful, in that the Company does not require verification of the funding before restoration. However, the availability of this option is constrained at present by the availability of agencies with the expertise and staffing to engage in emergency case management in a 24 hour period. Currently, OPC has been filling that niche, since OPC has a successful track record in providing comprehensive assistance to customers, especially those with critical needs. However, the process requires OPC to be largely available to navigators for guidance in their presentation of cases to the Company. That level of OPC involvement is not sustainable for a full BGE program or an expansion to other utility service territories.

Goals

OPC would like to continue to work with BGE and other utilities to do the following:

- Expand the pilot program to other service territories
- Expand the availability of the process to all customers who meet the medical certification requirements
- Expand training and participation to a wider circle of navigators and agency participants
- Extend the service restoration option to permit immediate restoral of service for customers with critical needs with a commitment to pursue funding assistance.

² The 55 day rule would also apply in the event the customer applies for EUSP/MEAP assistance.

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Outstanding concerns

- Winter restrictions - Affidavit requirements to ensure that service termination does not constitute a threat to the life or health of the occupants (COMAR 20.31.03.03)
- Smart meter service disconnections – field visits
- Reasonable payment arrangements