July 15, 2020

Via EFIS.

Missouri Public Service Commission
P.O. Box 360
Jefferson City, Missouri 65102

Re: Case No. AW-2020-0356, In the Matter of a Working Case to Consider Best Practices for Recovery of Past-Due Utility Customer Payments After the Covid-19 Pandemic Emergency.

Dear Honorable Commissioners,

Sierra Club appreciates the opportunity to submit these comments on behalf of its 12,000 members in Missouri.

Missouri utility customers are facing an unprecedented pandemic. Over 27,000 Missourians have tested positive for the coronavirus, with over 1,000 of them losing their lives, and almost 300,000 Missourians are currently unemployed. African American and other minority Missourians have been particularly impacted by the virus. The financial cliff that persons living paycheck-to-paycheck avoided prior to the COVID-19 pandemic is now unavoidable, with utility, rent, and other bills coming due. School and childcare closures, job furloughs, permanent job losses, and COVID-19-related health issues are just some of the crises low-income families, in particular, are experiencing.

The fallout from this pandemic is far from over. Missouri is in the midst of a surge in cases. On July 10, 2020, St. Louis Public Radio reported:

> Missouri this week saw a dramatic increase in the number of coronavirus cases, with nearly 800 people testing positive on Thursday (July 9).

> The seven-day average of new cases in Missouri is nearly three times what it was a month ago. As of Thursday (July 9), about 600 new cases were diagnosed each day.[1]

On July 14, 2020, the St. Louis Post-Dispatch reported that Missouri set a new record of COVID-19 infections with 936 cases reported that day. This was the third time in eight days that the new cases record in Missouri had been broken.[2]

The widespread impacts of this pandemic have amplified existing financial hardships and exacerbated the tough conditions that have long plagued Missouri's impoverished families and communities of color. Black Missourians are suffering a deadly disproportionate impact from COVID-19; black people account for 34.54% of COVID-19 deaths in the state, even though they only make up 11.8% of the population.[3] Similarly, Hispanic/Latinos account for15% of the state's COVID-19 cases despite accounting for only 4% of the population.[4]

It is within this context of suffering across Missouri that the Public Service Commission ("Commission") should view this docket. We urge the Commission to rise to meet the challenges at hand, and create a state program that will relieve the economic pressure, and enable Missourians to rebound from the financial fallout of this pandemic while also maintaining access to utility services essential to slowing the spread of the disease and protecting public health. The Commission should use this opportunity to remedy some of the fundamental inequities that have exacerbated the impact of this pandemic on low-income households and communities of color.

Utility services are always essential, but even more so now. The nation is grappling with a pandemic, the spread of which can be slowed by routine handwashing and social distancing. To prevent the accelerated spread of the disease, many people are now working from home, attending school online, and just generally socially distancing from each other. The ability to remain safely and comfortably in one's own home during this pandemic should not be determined by one's financial condition during this emergency.

The financial hardships of society's most vulnerable have compromised their ability to routinely pay their utility bills. This problem is only exacerbated by the COVID-19 crisis. At this moment, well over 135,000 Americans have lost their lives to this pandemic, and 39 million people across our nation are out of work. It is absolutely critical that we respond with transformative change on a scale commensurate with the novelty and urgency of the crisis we face. As this crisis exposes cracks in our social and economic systems, it is incumbent upon us to protect the most vulnerable populations while also advancing our vision for a healthy, safe future with access to clean water and energy for all.

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[1] "Missouri Coronavirus Cases Skyrocket, And Doctors Worry Deaths Aren't Far Behind," Sarah Fentem, St. Louis Public Radio, July 10, 2020.
[2] "Missouri breaks record for daily COVID-19 cases for third time in eight days," Nassim Benchaabane, St. Louis Post-Dispatch, July 14, 2020.
[3] https://www.arcgis.com/apps/MapSeries/index.html?appid=8e01a5d8d8bd4b4f85add006f9e14a9d; https://www.census.gov/quickfacts/MO.
[4] COVID-19 Tracking Project. https://covidtracking.com/race/dashboard.

Missouri has been hit hard economically by COVID-19. There are almost 300,000 unemployed Missourians.[5] The seasonally adjusted unemployment rate in Missouri increased from 3.9% in March 2020 to 10.2% in April 2020.[6] This continued through May, the last month with reported data, when the state unemployment rate was 10.1%.[7]

As economic hardship continues to render many individuals and families unable to pay, utility debt will build up. Mounting utility bill debts, combined with the many barriers to accessing the limited assistance currently available, will further hinder individuals' and families' ability to recover from the lost income and health impacts being caused by this crisis. But within every challenge lies the seed of opportunity. The current pressing need to adapt represents an opportunity and an obligation to invest in the short-term and long-term well-being of Missouri and its residents, to protect those hardest hit by this crisis, and to innovate and redesign our economy in a way that does not continue to perpetuate and exacerbate racial and economic inequality or the ongoing climate crisis.

Several states have already begun to rise to this challenge by enacting bold new policies to ensure the safety and well-being of their citizens during these difficult times. These bold changes embody the ambition and innovation that are the hallmarks of the American response to adversity. We hope that this Commission will draw inspiration from these efforts, and respond to the present urgency with the vigor and conviction befitting of public servants in a time of crisis. Sierra Club urges this Commission to design programs and protections that prevent vulnerable residents from (1) being disconnected from utility service, (2) coming out the other side of the pandemic saddled with utility debt, and (3) being unable to access protections and aid because of bureaucratic barriers or requirements.

Sierra Club submits the following comments and recommendations relevant to this docket.

Accounting Authority Orders

As the COVID-19 crisis continues, utilities will inevitably continue to accrue COVID-19-related costs. However, due to the high levels of uncertainty, it does not make sense for regulators to approve the recovery of those costs or the presumption of recovery concurrently with their accumulation. Utilities should wait until they have a clearer and fuller picture of the costs *and* savings from operations during the COVID-19 pandemic before seeking recovery. Moreover, the Commission should distinguish between actual costs that are directly pandemic-related (e.g., safety, staff overtime, disconnection avoidance), and lost revenue, which aren't actually costs, but merely earnings lower than anticipated because of the economic downturn (e.g., reduced electricity sales). The Commission should not grant any accounting authority for lost revenues.

The Commission should only allow accounting treatment only for the direct expenditures related to utilities response to the COVID-19 pandemic and should explicitly state that such accounting treatment doesn't provide a presumption of recovery. In addition to uncollectible expenses, there are three additional categories of direct costs: 1) costs associated with sequestering staff to

[5] *The Missouri unemployment rate rises*, The Missouri Times (May 22, 2020).
[6] U.S. Bureau of Labor Statistics, available at: bls.gov/eag/eag.mo.htm.
[7] *Id.*

ensure an available and healthy workforce, 2) health and safety costs to monitor and mitigate illness and viral transmission, and 3) personal protective equipment (PPE) and materials to ensure the safety of employees and customers. Any accounting order should explicitly detail what costs the utilities should track.

The Commission should not allow accounting treatment for lost revenue. The Commission only considers the creation of a regulatory asset for incurred costs, and lost revenue is not an incurred cost. The risk of lower profitability than anticipated is a risk born by investors, not ratepayers.

If the Commission approves Accounting Authority Orders (AAOs) to allow utilities to track potential COVID-19-related costs and savings, the AAOs should:

- **Explicitly state that creation of an AAO is not a grant of recovery or a presumption of future recovery.** An accounting order should not authorize recovery, guarantee recovery, or provide a presumption of recovery of costs and should instead explicitly state that future recovery, the application of any carrying charges, and the proper amortization period are contingent on a prudence finding or other review in the utility's next rate case or alternative rate recovery filing. Some of these costs may ultimately be more fairly borne by shareholders or the government than by ratepayers. Furthermore, regulatory accounting is a type of single-issue ratemaking, which is a departure from the fundamental principles of ratemaking and is prohibited.[8]

- **Ensure specificity in the items to be tracked.** Vague or very broad accounting orders run the risk of allowing the utility to recover costs that are only indirectly or tangentially related to the pandemic. This is problematic because it may undermine the Commission's ability to investigate specific expenses in the future and may result in over-recovery. Instead, Sierra Club urges the Commission to issue accounting orders that require utilities to track and report their expenses at a granular and detailed level so as to enable a comprehensive future dialogue regarding cost recovery. For example, under a proposed accounting order in Arizona, utilities could track personal protective equipment, renovations to office/commercial spaces necessary for safer interactions (like signage or barriers), and additional cleaning supplies that are not typically incurred outside of the pandemic.[9]

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[8] *In Re UtiliCorp United Inc.*, No. 200100849, 2001 WL 791798 (Apr. 13, 2001) ("But the Commission simply does not have the authority to engage in single-issue ratemaking, and convenience, expediency, and necessity are not proper matters for consideration when determining the extent of the Commission's authority. . . .Because it violates the prohibition against single-issue ratemaking, the Commission is without authority to approve UtiliCorp's tariff."); *In the Matter of the Revised Tariff Sheets for the Laclede Gas & Missouri Gas Energy Operating Units of Laclede Gas Co.*, No. GT-2016-0026, 2015 WL 5244726, at *3 (Sept. 2, 2015) ("As a result, the relevant factors to consider regarding those tariffs are also different, and do not fall within the prohibited practice of single-issue ratemaking. The reason single-issue ratemaking is prohibited is a concern that in setting rates based on a change in a single cost, the Commission could be overlooking other costs that have changed in a different direction, leading to rates that do not reflect the utility's true cost of service.")

[9] Revised Draft Blanket Accounting Order for Tracking COVID-19 Expenses, Docket No. AU-00000A-20-0094, Arizona Corporation Commission (May 14, 2020), available at: https://docket.images.azcc.gov/E000006494.pdf.

- **Do not allow utilities to track unearned revenues.** Emerging regulatory practice for COVID-19 across the nation does not support the recovery of unearned revenue, or the creation of regulatory assets or accounting, to compensate for the reduction in sales resulting from COVID-19.[10] That is because investors, not customers, earn the return on capital, investors must bear corresponding risk. Investor-owned utilities enjoy generous returns to their shareholders (even during economic downturns) because they are expected to shoulder some elements of risk, as would any private company. Some utilities have sought an increase in earnings due to reduced demand in an attempt to buffer against the impact to shareholders.[11] If the Commission were to allow utilities to continue to earn their ROE and engage in selective ratemaking to top off anticipated profits when revenues fall short, then shareholders would face no risk. This is inappropriate. Reduced short-term demand is a shareholder-borne risk.[12] Ratepayers

[10] *See, e.g.*, Regulatory Commission of Alaska, Order No. 1 (May 1, 2020), Matter No. U-20-015; Arkansas Public Service Commission, Order No. 1 (April 10, 2020), Order No. 2, (May 27, 2020), Docket No. 20-012-A; Connecticut Public Utilities Regulatory Authority, Docket 20-03-15, Interim Decision (April 29, 2020); District of Columbia Public Service Commission, Order No. 20358 (May 28, 2020), Formal Case No. 1164, Order No. 20329 (April 15, 2020), GD2020-01; Georgia Public Service Commission, Order (April 16, 2020); Illinois Commerce Commission, Emergency Order (March 18, 2020), Docket No. 20-0310; Kentucky Public Service Commission, Order (March 16, 2020), Order (March 24, 2020), Case No. 2020-00085; Louisiana Public Service Commission, Special Order No. 22-2020 (April 29, 2020), Special Order No. 28-2020 (May 29, 2020); Maryland Public Service Commission, Order No. 89542 (April 9, 2020), Case No. 9639; Michigan Public Service Commission, Order (April 15, 2020), Case No. U-20757; Minnesota Public Utilities Commission, Order Approving Accounting Request and Taking Other Action Related to COVID-19 Pandemic (May 22, 2020), Docket No. E,G-999/CI-20- 425, Docket No. E,G-999/M-20-427; Mississippi Public Service Commission, Order Temporarily Suspending Disconnection of Certain Utility Services (March 15, 2020), Order Regarding Use of Customer Deposits (March 17, 2020), Docket No. 2018-AD-141; Nevada Public Utilities Commission, Order (March 27, 2020), Docket No. 20-03021; Public Utilities Commission of Ohio, Entry (March 20, 2020), Finding and Order (April 8, 2020), Case No. 20-591-AU-UNC, Finding and Order (May 6, 2020), Case No. 20-602-EL-UNC, Case No. 20-063-EL-WVR, Case No. 20-604-EL-AAM, Case No. 20-734-EL-AEC; Corporation Council of the State of Oklahoma, Order No. 711412 (May 7, 2020), Cause No. PUD 202000050; State of Rhode Island and Providence Plantations Public Utilities Commission, Order No. 23786 (March 17, 2020), Order No. 23809 (April 15, 2020), Docket No. 5022; Public Service Commission of South Carolina, Order No. 2020-344(A) (May 28, 2020), Docket No. 2020-1060A; Public Utility Commission of Texas, Order Related to COVID-19 Electricity Relief Program (March 26, 2020), Order Related to Accrual of Regulatory Assets (March 26, 2020), Project No. 50664; Commonwealth of Virginia State Corporation Commission, Order Suspending Disconnection of Service and Suspending Tariff Provisions Regarding Utility Disconnections of Service (March 16, 2020), Case No. PUR-2020-00048; Public Service Commission of Wisconsin, Order (March 24, 2020), Docket 5-AF-105; Public Service Commission of Wyoming, Record No. 15474 (March 26, 2020), Docket No. 90000-151-XO-20, Record No. 15496 (May 18, 2020), Docket No. 20002-117-EA-20.

[11] https://iurc.portal.in.gov/legal-case-details/?id=197c5aad-9a93-ea11-a811-001dd8018921.

[12] Verified Affidavit of Cheryl Roberto on Behalf of Sierra Club, In re; Petition to Office of the Utility Consumer Counselor for Generic Investigation Into COVID-19 Impacts, Cause No. 45380, available at: https://iurc.portal.in.gov/legal-case-details/?id=197c5aad-9a93-ea11-a811-001dd8018921; Sierra Club's Response to Joint Utilities Petition and Office of Consumer Counselor Petition, In re; Petition to Office of the Utility Consumer Counselor for Generic Investigation Into COVID-19 Impacts, Cause No. 45380

should not be saddled with an unfair obligation to maintain utility profit margins while using fewer of a utility's services. That is why the Commission must explicitly state that utilities cannot recover lost revenues [13]due to possible load reductions. As the Indiana Utility Regulatory Commission said in denying AAO treatment for lost revenue, "However, asking customers to go beyond their obligation and pay for service they did not receive is beyond reasonable utility relief based on the facts before us. A utility's customers are not the guarantors of a utility earning its authorized return."

- **Track savings as well as costs.** Any cost savings resulting from reduced operations should be included in expense tracking and deducted from any compensatory cost recoveries utilities might be awarded after the COVID-19 crisis. For example, utilities are likely to see savings resulting from reductions in fuel usage at generating stations and reduced overhead and operational expenses (e.g., slower energy consumption in company buildings due to office closures). Similarly, utilities should be required to track aid received, and analogous items, such as federal Paycheck Protection Program funds obtained to pay for labor costs. The Arizona proposed order contains an example of such a requirement.[14]

- **Facilitate identification of imprudently incurred costs.** Reduced demand could shine a light on imprudently incurred costs, like long term coal contracts. Some utilities were already using artificial measures like coal price decrements and self commitment before the pandemic that burden captive customers with the costs of uneconomic coal contracts.[15] Recovery for poor pre-pandemic business decisions that were not in the interest of consumers should be disallowed.

Data Tracking and Reporting

The Commission should establish reporting requirements that will allow regulators to assess the impacts of the utilities' actions. Utilities should be required to provide the Commission with sufficient data to monitor the impact and efficacy of the established protections and assistant programs.[16] It will be necessary to assess whether particular communities, including communities of color, are being disproportionately impacted by a utility's disconnection and credit and collections processes. Without the appropriate data, the utilities, the Commission, and the public lack the knowledge necessary to focus payment support and energy efficiency

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(which was combined with Cause No. (45377), available at: https://iurc.portal.in.gov/legal-case-details/?id=197c5aad-9a93-ea11-a811-001dd8018921.

[13] Phase One and Interim Emergency Order of the Commission, p. 9, Cause No. 45380, Approved June 29, 2020.

[14] https://docket.images.azcc.gov/E000006494.pdf.

[15] http://www.cphibiz.com/news/show.php?itemid=8331; https://www.sierraclub.org/sites/www.sierraclub.org/files/Other%20Peoples%20Money%20Non-Economic%20Dispatch%20Paper%20Oct%202019.pdf.

[16] This requirement was recently adopted by the Indiana Utility Regulatory Commission on June 29, 2020 in its Phase 1 and Interim Emergency Order (Case No. 45380).

programs on the customers who stand to benefit most from them.[17] Sierra club recommends the requirement to report at least the following kinds of information for both general residential customers and identified low-income residential customers:

- Information on disconnections (if any) and other credit and collections data by zip code, on at least a monthly basis, through at least the end of 2021.[18]

- A description of the utility's efforts to contact delinquent customers since the start of the crisis.

- Sufficient data for the Commission to assess the utility's progress in getting delinquent customers to enter into payment arrangements.

Additionally, Sierra club urges the Commission to initiate a conversation about how to gather demographic data for delinquent customers and individuals/households being disconnected. Recent events have made it clearer than ever that we as a society need to actively and intentionally grapple with inequity in a way that acknowledges and directly confronts disparate impacts between racial groups.

A recent agreement in Illinois established a suite of COVID-related consumer protections, among them a requirement for utilities to report disconnect, credit, and collections data over the next several months.[19] Reporting will include ZIP code data to allow state regulators to assess the impact a utility's disconnection and repayment practices may have on certain communities, including communities of color.

Reasonable Repayment Plans

It is critical for this Commission to engage proactively with the challenge of addressing the large number of past-due balances that ratepayers will be forced to confront as they emerge from this pandemic. We must ensure that poor and working class families do not go into debt as a result of maintaining access to utility services during the COVID-19 pandemic. We cannot allow the most vulnerable in society to emerge from this international crisis saddled with the additional burden of accumulated debt as some sort of penalty for maintaining the habitability of their homes as they behaved responsibly and sheltered in place or socially distanced in response to a global pandemic. If not already in place, an arrearage management program should be developed to address post-pandemic arrearage forgiveness, improve low-income payment options, and provide significant bill-repayment assistance to help people catch up with their bills as Missouri recovers

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[17] A 2015 report from the Energy Information Administration revealed that nearly a third of U.S. households have struggled to pay their energy bills. About 20% had to reduce or forgo food, medicine, and other necessities to pay an energy bill that year, and over 10% of households kept their homes at unhealthy or unsafe temperatures. (https://www.eia.gov/todayinenergy/detail.php?id=37072).

[18] The National Consumer Law Center has provided an issue statement discussing the need for electric and gas service providers to report data points that are necessary for determining "the extent to which residential customers are affordably accessing and retaining essential utility service." The statement includes a list of data points and statistics that utilities should be required to collect. (https://www.nclc.org/images/pdf/special_projects/covid-19/IB_Data_Reporting.pdf)

[19] https://illinoisattorneygeneral.gov/pressroom/2020_06/20200611.html.

from the COVID-19 pandemic. In addition to the clear moral imperative to protect the most vulnerable from the deleterious effects of this international crisis, it has been demonstrated that bill payment assistance plans benefit non-participating customers as well. Other states have already initiated processes to develop such programs that this Commission might look to by way of example.[20]

As an additional resource, The National Consumer Law Center has developed a design template that can be customized to develop utility-specific or state-specific proposals for comprehensive current bill affordability and arrearage management programming.[21] The template (1) provides an example of tables and charts related to income, poverty and burdens to establish program need, (2) provides tables and charts for illustrating costs and benefits of alternate program designs (straight discount, tiered discount and percentage of income payment plan), and (3) provides a table illustrating non-participant program bill impacts stemming from a volumetric charge on all customer classes' bills.

No Late or Disconnection/Reconnection Fees

Late fees, disconnection/reconnection fees and security deposits should be eliminated, as they are a significant barrier to initiating, reestablishing, and maintaining continuing utility service for financially strained customers. These fees are most often imposed upon customers who are already struggling to pay their bills. Additionally, the fees utilities charge are often much higher than the associated short term cost of capital, meaning that the utilities are profiting off of these late and disconnection fees. This is reprehensible. Utilities should not profit by imposing excessive fees on low-income customers who already cannot afford to pay their existing expenses. This crisis has helped elevate the understanding of the punitive and exploitative nature of these fees, and the long-term rectification of the disproportionate impacts on marginalized communities, and especially communities of color, must be addressed. The Kansas Corporation Commission recently adopted some consumer protections for COVID-19 expenses that included a waiver of all late fees during the 12-month period of arrearage and repayment.[22] But this is merely a starting point; it would be a tragic disgrace to come out of the other side of this crisis with low-income families and communities facing burdensome utility fees that inhibit their ability to recover from the economic, physical, and emotional distress caused by the COVID-19 pandemic.

Require Verbal Expression of Financial Hardship To Participate In Assistance Programs

In order to make sure that these protections and assistance programs are easily accessible to individuals and families experiencing financial distress, utilities should be prohibited from requiring customers to provide documentation in order to access the protections and programs being implemented. Fiscally distressed individuals and families should not face additional

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[20] *See, e.g.,* Illinois Commerce Commission, Order (June 18, 2020), Docket No. 20-0309.

[21] https://www.nclc.org/images/pdf/special_projects/covid-19/WP_Program_Design_Template.pdf.

[22] https://estar.kcc.ks.gov/estar/ViewFile.aspx/20200521111445.pdf?Id=932794de-f0cc-4397-b1bf-948512be107e; Order Concerning Kansas Jurisdictional Utilities Following Expiration of Prohibition of Disconnects, p.8, Case No. 20-GIMX-393-MIS (May 21, 2020).

barriers when attempting to access the programs designed to provide them with aid and protection.

Require Creation of Voluntary Customer-Funded Programs

The Commission should require any utilities that do not yet have such a program to create voluntary programs allowing customers to decide to pay extra on their bills in order to provide aid to struggling customers. This is low-hanging fruit. Creating a program that enables generosity requires little from utility companies but can make a world of difference to people who are struggling to get by during this pandemic.

Focus Energy Efficiency Programs on High-Risk Customers

The financial cliff that persons living paycheck-to-paycheck avoided prior to the COVID-19 pandemic has now become unavoidable. School and childcare closures, job furloughs, permanent job losses, and COVID-19-related health crises make the ability to pay utility, rent, and other bills even harder. Before the pandemic hit, Missouri's poorest residents already shouldered a significant energy burden. According to Department of Energy data, Missourians earning 0-30% of area median income spend 16% of income on electricity, compared with the nationwide average energy burden of 11% for this poorest segment.[23] Plummeting income and employment loss will only exacerbate this energy burden for existing low-income customers and newly-financially strapped customers.

The Commission can help alleviate this burden by focusing energy efficiency programs on customers that already shoulder a disproportionate burden to pay energy bills and are at high risk of disconnection. These customers are the most likely to live in less-energy-efficient buildings and use less-energy-efficient appliances. Targeting these customers with energy efficiency programs represents a "two birds with one stone" solution—enhancing energy efficiency for these customers both enables them to reduce the cost of their utility bills and reduces overall demand for electricity, which in turn results in a reduction in the harmful emissions associated with fossil-fuel powered electricity generation.

Create a Low-Income Workgroup

Sierra Club encourages the Commission to expand its previous initiate with Ameren and establish a state-wide workgroup with a specific focus on working collaboratively with low-income customers across all Missouri utilities and communities to identify and address low-income specific energy issues, reduce energy waste, and create other new initiatives that could reduce the cost of the energy burden on low-income customers and communities. We encourage the Commission to look to the example set by Michigan in the development of its Energy Waste Reduction Low Income Workgroup.[24]

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[23] Department of Energy. Low-Income Energy Affordability Data (LEAD) Tool, available at: https://www.energy.gov/eere/slsc/maps/lead-tool.

[24] Michigan's EWR Low Income Workgroup facilitates collaborative work between various stakeholders with the goal of "bridg[ing] gaps between program offerings, facilitat[ing] more complete delivery of energy efficiency programs, and seek[ing] opportunities to better serve low-income single-family

Encourage or Require Use of the National Consumer Law Center's Electric Service Discount and Arrearage Management Program Design Template[25]

The National Consumer Law Center created an Electric Service Discount and Arrearage Management Program Design Template that provides a methodology for taking a data-driven approach to maintaining and enhancing the affordability of and access to essential utility services for low-income customers, and can be customized to develop utility-specific or state-specific proposals for comprehensive current bill affordability and arrearage management programming. The template (1) provides an example of tables and charts related to income, poverty and burdens to establish program need, (2) provides tables and charts for illustrating costs and benefits of alternate program designs (straight discount, tiered discount, and percentage of income payment plan), and (3) provides a table illustrating non-participant program bill impacts stemming from a volumetric charge on all customer classes' bills.

Sierra Club thanks you again for the opportunity to comment on utility policy and planning during the COVID-19 public health and economic crisis, and looks forward to continuing to engage in this discussion with the Commission and other stakeholders as this docket moves forward.

Sincerely,

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residences and multifamily buildings." MPSC, Low Income Workgroup, available at: https://www.michigan.gov/mpsc/0,9535,7-395-93307_93312_93320_94834-484084--,00.html.

[25] https://www.nclc.org/images/pdf/special_projects/covid-19/WP_Program_Design_Template.pdf.