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Energy, Utility and Telecommunications

Soaring energy prices are having devastating effects on family finances across the country, especially in low-income households. In most states, the package of protections against service terminations, efficiency programs, and payment assistance programs are inadequate to ensure universal access to a basic level of utility service. Low-income energy efficiency programs must be expanded to minimize the amount of energy these households need. Just as important, programs and policies must be adopted to address the growing gap between home energy costs and the ability of low-income families to bear those costs.

[The Principles for Energy and Water Security for All Americans \(PDF\)](#)

Climate Change: [Principles](#) for Protecting Low- and Moderate- Income Consumers by Mitigating the Costs of Climate Change Policy and Investing in Re-building Communities

Key Reasons to Use NCLC's Consulting Services on Energy, Utilities and Telecommunications

NCLC's staff of experts can provide unique and cost-effective consulting services concerning electric, natural gas, water, and telecommunications issues. NCLC provides services not available elsewhere, at affordable rates. We are recognized as leaders in:

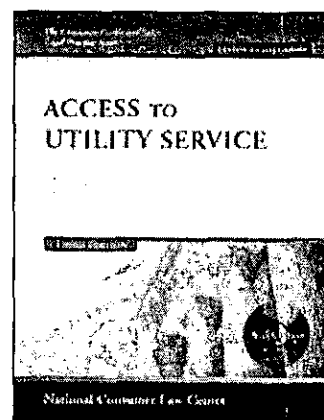
1. Design of low-income energy payment assistance, arrearage management and energy efficiency programs
2. Providing legal representation to low-income consumer groups in a broad range of utility proceedings
3. Development of successful models to dramatically increase program outreach

Company
Exhibit No. 73
Case No(s) EP-2008-0218
Date 12-1-08 Rptr pf

Area of Expertise

- [Energy Efficiency](#)
 - [Low-Income Home Energy Assistance Program \(LIHEAP\)](#)
 - [Telecommunications](#)
 - [Water](#)
 - [Electric and Gas](#)
 - [Other Low-Income Utility Issues](#)
-
- [Partial List of Recent and Current Clients](#)
 - [NCLC's Energy and Utility Staff](#)
 - [NCLC's Energy and Utility Publications](#)

4. Advocacy for funding of federal and state fuel assistance and weatherization programs, dating back over 25 years
5. Design and implementation of regulatory consumer protections
6. Application of a unique blend of legal, policy, technical and empirical research skills
7. Training frontline staff to identify utility consumer protection issues
8. Building consumer advocacy capacity at the state level
9. Providing expert testimony in utility regulatory and other proceedings



**Access to Utility
Service (2006)**

For further information, contact: John Howat at jhowat@nclc.org or 617-542-8010.

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PRINCIPLES OF ENERGY AND WATER SECURITY FOR ALL AMERICANS

In 21st century America, it is reasonable that all workers, retirees and their families should be able to afford to meet their basic requirements for fuel and safe shelter, and to expect that the policies that govern our energy markets are fair, forward-looking, and make our nation more secure. Current policies are not achieving these goals.

Consumers are experiencing unprecedented increases in bills for their household electricity, heat, water, as well as transportation. Many with modest incomes cannot afford to pay for the minimum energy their homes need along with their other basic necessities such as rent, food and medicine.

The nation should recognize and act on the following two basic principles to correct its current course.

I. ELECTRICITY, HEAT AND WATER ARE NECESSITIES OF LIFE THAT MUST BE AFFORDABLE FOR ALL CONSUMERS.

II. STATE, FEDERAL AND LOCAL GOVERNMENTS MUST ACT TOGETHER TO ASSURE ELECTRICITY, HEAT AND WATER SERVICES ARE RELIABLE, SAFE, SUSTAINABLE AND OFFERED AT A FAIR PRICE.

Principle I: Electricity, heat and water are necessities of life that must be affordable for all consumers.

Therefore:

1. All consumers must have secure, safe, and reliable supplies of electricity, heat and water for their homes.
2. Sufficient energy and water should be provided at a fair price. A fair price is one that reflects the long-term reasonable cost of providing services from dependable supply and conservation and efficiency sources managed to maximize reliability and availability.
3. Consumers should pay their fair share of the costs of providing the household energy and water they need; a fair share is an affordable amount, taking into account a household's incomes.

Principle II: State, federal and local governments must act together to assure electricity, heat and water services are reliable, safe, sustainable and offered at a fair price

Therefore:

1. Because states have the primary responsibility for protecting consumers' interests in affordable energy and water, they must:
 - Establish market rules and consumer protections that ensure affordable, stable, and secure energy and water supplies;
 - Require that consumers get fair treatment in all transactions with energy and water providers;
 - Ensure there are prudent public and private investments in diverse, sustainable, clean and least-cost supplies of energy and water; and
 - Determine that utility rates, consumer services and industry investment practices allow consumers with limited funds to pay no more than a fair and affordable share of their energy and water service.
2. Because the federal government has responsibility for overseeing interstate energy markets, it must:
 - Reinforce the states' ability to protect the public's interest in secure, safe and affordable energy and water and the states' power to hold energy and water providers accountable for their decisions;
 - Support state policies that promote price stability, reliability and long-term availability;
 - Ensure the nation has sufficient reserves of production, transportation and storage capacity to protect against national and international market disruptions;
 - Ensure that wholesale energy prices are just and reasonable;
 - Implement policies that encourage prudent investments in new supply and, conservation and efficiency;
 - Supervise national markets to ensure that transactions and corporate relationships are transparent, customers are protected from market manipulation, and the security of American consumers is maintained;
 - Together with the States, take action to sustain a diverse, clean domestic energy supply, including efficiency investments; and
 - Implement national policies that support fair prices and affordable supplies of energy and water in every region of the nation.
3. Governments at every level must be accountable to energy and water consumers, including residential consumers, and maximize their participation, by ensuring that every element of decision-making is:
 - Transparent,
 - Based on a public planning process and
 - Open to all consumers and their advocates.

WHO WE ARE

These principles were developed by a longstanding, informal coalition of consumer energy advocates and community-based organizations meeting in May of 2006 at Parma, Ohio.

The undersigned organizations and individuals include most of the members of this 'Low-Income Advocates Network'. They are marked with an asterisk. The undersigned welcome inquiries about these principles and the strategies for implementing them.

Although our group's principal focus is home energy, we recognize that transportation energy consumes a growing and increasing percentage of low-wage workers' incomes. The cost of transportation fuel and the cost of home energy fuels are closely related and similar principles should guide policy regarding mobility.

Finally, we are mindful of the opportunities for community sustainability offered by environmentally attractive alternatives to large-scale, fossil-fuel energy systems. We support policies that require a diverse, sustainable and clean energy supply that includes efficiency, renewables, and other distributed resources.

The following signers were ALSO part of the group that drafted these principles:

Association for Energy Affordability (New York)
Community Power Network of New York State (Minerva, NY)
Connecticut Legal Services, Inc. (Rockville, CT)
Consumers for Fair Utility Rates (Cleveland, OH)
Illinois Community Action Association (Springfield, IL)
May Dugan Multi-Service Center (Cleveland, OH)
National Community Action Foundation (Washington, DC)
National Consumer Law Center (Boston, MA)
Ohio Partners for Affordable Energy (OPAE) (Findlay, OH)
Public Utility Law Project of New York (NY PULP) (Albany, NY)
The Energy Project (Bellingham, WA)
A World Institute for Sustainable Humanity (AWISH) (Bellingham, WA)

SUPPORTING ORGANIZATIONS

National Organizations

National Community Action Foundation
(Washington, DC)

A World Institute for Sustainable Humanity (A
W.I.S.H.) (Bellingham, WA)

National Consumer Law Center (Boston, MA)

State and Local Organizations

Colorado

Association for Senior Citizens (Denver)
Catholic Charities, Diocese of Pueblo (Pueblo)
Douglas/Elbert Task Force (Castle Rock)

Connecticut

Connecticut Legal Services, Inc. (Rockville)
Greater Hartford Legal Aid (Hartford)
New Haven Legal Assistance Association (New
Haven)

Illinois

Illinois Community Action Association
(Springfield)

Minnesota

Energy CENTS Coalition (St. Paul)
Mid-MN Legal Services Advocacy Project (St. Paul)

New York

Community Power Network of New York State
(Minerva)
Public Utility Law Project of New York (Albany)

Ohio

Appalachian People's Action Coalition (Athens)
Ashtabula County Community Action
(Ashtabula)
Cerebral Palsy Association of Ohio (Columbus)
Cleveland Housing Network (Cleveland)
Coalition on Homelessness & Housing in Ohio
(COHHIO) (Columbus)
Community Action Organization of Scioto Co.,
Inc. (Portsmouth)
Consumers for Fair Utility Rates (Cleveland)

Corporation for Ohio Appalachian Development
(COAD) (Athens)

Hunger Network in Ohio (Columbus)
May Dugan Multi-Service Center (Cleveland)
Ohio Environmental Council (Columbus)
Ohio Heartland Community Action Commission
(Marion)
Ohio Partners for Affordable Energy (Findlay)
Ohio State Legal Services Association
(Columbus)
United Clevelanders Against Poverty (Cleveland)
Washington-Morgan Counties Community
Action Program

Washington

Rural Resources (Spokane)
The Energy Project (Bellingham)
Washington State Community Action Partnership
(Seattle)

West Virginia

West Virginia Community Action Partnership
(Charleston)