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Community Improvement | 317 Roseville Avenue | Newark, NJ 07107 | t: 973.485.0701 | f: 973.485.7555

05/11/2019

Aida Camacho-Welch, Board Secretary
New Jersey Board of Public Utilities
44 South Clinton Avenue
Trenton, New Jersey 08625-0350

Re: Revised Submission -Topics outlined in Docket #EO19030308 Re: USF –Periodic Review

- Item 1) I do believe that the income ceiling for USF should be increased to meet the guidelines for the LIHEAP and Weatherization program. Reason being is that the guideline for LIHEAP and WX is a very low income mark and several more households that are struggling to meet their utility costs would benefit from an increase to the program guideline ceiling being increased up to 200% of Federal Poverty Guidelines. I feel that it would support the initiative of targeting USF eligible households for the Weatherization program and vice versa.
- Item 2) I agree that the USF Energy Affordability Threshold should be reexamined; I would consider leaving the threshold for gas heating and non-heating gas for clients that do not pay any heating at 3% but lowering the electric heating to 4% and raising the threshold for Fuel to 6%. The reason being that although electric heating cost more than gas, and fuel heating oil may out cost both gas and electricity, the clients who pay for electric heating even with a higher energy benefit from LIHEAP, pay a lot more in energy costs to heat their homes during winter. Lowering the criteria to 4% would allow the clients who need assistance to decrease their burden and actually attempt to be more conservative and still receive assistance that they truly need. (Some people are actually increasing their usage just to be eligible for assistance, which is counterproductive.) I believe that increasing the threshold for Fuel Oil heating clients to 6% is fair because they receive a higher energy benefit from LIHEAP; receive Universal Service fund benefits, and are also entitled to additional utility assistance for electricity during emergency assistance season for utilities. It seems that increasing the threshold for the utility consumption for oil or fuel-heating clients will level the playing field for the recipients of the program.
- Item 3) I feel that \$150.00 per month maximum per month is a fair disbursement and that if raised at all should not exceed an even amount of \$2,000.00 annually. Again, my personal opinion is that the current benefit that maxes at \$1,800.00 annually is a very fair benefit amount.
- Item 4) I agree that a one-time USF "incentive credit" to BPU Comfort Partners and DCA Weatherization Assistance Program recipients should be allocated. I think \$200.00 would be a good amount, would be impactful and appreciated by most. Putting that credit into play would be a great gesture towards low income households however there is a question as to how NJDCA Weatherization Assistance Program recipients' be categorized or collected by the Board in order to issue these benefits. Negotiations or a MOU need to be in place to allow that the referring agency capture and service the identified households for the Weatherization Program and that data from the USF/HEA system not be captured and outsourced for the Weatherization efforts by other entities.

If you would like to have further discussion with regard to any of the above items feel free to reach me at 973-485-0701 ext. 4414 Monday- Friday 9:30 am – 5:00 pm or via email at any time.

Thank you.



Cecelia S. Aiken, HEA Manager,
La Casa de Don Pedro

cc: Fidel Ekhetar, Supervisor LIHEAP NJDCA; Ahmad s. McDougle, Assistant Director NJDCA; Dennis Rashad, State Monitor LIHEAP NJDCA; Raymond Ocasio, Executive Director La Casa de Don Pedro; Norma Sessa, Director CID Division La Casa; Percival MacMaster, Supervisor LIHEAP La Casa, & Maureen Clerc, Energy Assistance Programs BPU

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