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Multnomah County Department of County Human Services
NeighborImpact
Oregon Coast Community Action
Oregon Human Development Corp.
United Community Action Network
Yamhill Community Action Partnership

RE: UM 1787 Percentage of Income Payment Program

Dear Commission Staff:

Docket No. UM 1787 was opened per Commission Order No. 16-254 to examine a Percentage of Income Payment Program (PIPP). However, after three workshops it was clear that a comprehensive evaluation of the current programs would be best for all parties before determining if PIPP is the best use of ratepayer funds

Oregon Housing and Community Services had planned an evaluation of the Community Action Agencies delivery of energy assistance, so it makes sense to leverage that opportunity for an evaluation of all the energy assistance programs. These comments are a response to the Oregon gas utilities that want to separate themselves from this docket and the evaluation for possible changes in Oregon's energy assistance delivery. CAPO recommends that the LDCs remain a part of this order. Oregon's three gas utilities receive LIHEAP from Community Action Agencies, so any recommended changes in that program would affect their business operations. It is our hope that LIHEAP, Oregon Energy Assistance Program (OEAP), and the three current gas programs would be evaluated, and recommendations made to the commission on the best use of the low-income assistance funds. All gas programs leverage the use of Community Action agencies as the resource for delivery and are interwoven in their administration. Ratepayers deserve to know whether the gas utility programs are most efficient in their current form.

The LDCs state that they have had no experience working with the housing stability council or EPC, but these two groups currently make recommendations based on the LIHEAP program, that is a program received by the LDCs. The gas utilities are welcome at any time to review the Housing Stability Council agenda and comment in the public hearings when changes are made to programs. So far, they have chosen not to participate in this process.

This evaluation should be comprehensive, and all programs studied to ensure that disparities in delivery are not based on a ratepayer's heating source. Additionally, most states that have a PIPP have a joint PIPP that creates a cap for combined gas and electric payments (usually at 10% for both services combined).

It is for these reasons that CAPO wishes all the programs to be included in the order, electric and gas.