

**PUBLIC SERVICE COMMISSION OF THE DISTRICT OF COLUMBIA
1325 G STREET, N.W., SUITE 800
WASHINGTON, DC 20005**

ORDER

August 9, 2021

FORMAL CASE NO. 1164, IN THE MATTER OF AN INQUIRY INTO THE IMPACTS OF THE COVID-19 PANDEMIC ON DISTRICT UTILITIES AND CONSUMERS, Order No. 20990

I. INTRODUCTION

1. By this Order, the Public Service Commission of the District of Columbia (“Commission”) approves Washington Gas Light Company’s (“WGL” or the “Company”) proposed Arrearage Management Program (“AMP”) consistent with the directives in this Order. WGL shall recover its costs for implementing the AMP through the Residential Essential Service (“RES”) surcharge mechanism. The enrollment window for participation in the AMP shall remain open for at least one year after implementation. The \$3,000 arrearage cap WGL proposed is approved, but the Company is directed to prioritize hard access accounts that are above the \$3,000 arrearage cap in its AMP to service customers who have larger arrearage balances. The Commission approves provisions in the AMP regarding budget billing and Energy Efficiency programs. Further, the Commission, *sua sponte*, waives tariff provisions related to the recertification of eligible participants in the utility discount programs (“UDPs”) for Fiscal Year 2022. WGL is also directed to include bill inserts on gas service bills to advertise the AMP program and conduct a robust customer awareness program through social media, customer letters, and its website. WGL shall file new tariff provisions regarding the AMP and amend its Arrearages and Disconnections Reports (“ARDIR”) to include information on the AMP’s implementation. In addition, WGL shall amend its monthly ARDIRs to include AMP information about customer participation levels and arrearage balances. Finally, WGL shall file quarterly reports in the ARDIR docket to allow the Commission to review the AMP in its third quarter.

II. BACKGROUND

2. By Order Nos. 20707 and 20749, the Commission adopted several options to assist ratepayers with their utility bills upon the Mayor’s lifting of the public health and public emergencies.¹ These actions include, but are not limited to: (1) increasing the income eligibility to 80% Area Median Income (“AMI”) for participation in the Commission’s UDPs, the Residential

¹ *Formal Case No. 1164, In the Matter of an Inquiry into the Impacts of the COVID-19 Pandemic on District Utilities and Consumers* (“*Formal Case No. 1164*”), Order No. 20707, rel. March 3, 2021 (“*Order No. 20707*”); *Formal Case No. 1164*, Order No. 20749, rel. May 27, 2021 (“*Order No. 20749*”).

Aid Discount (“RAD”)² and the RES programs;³ (2) directing WGL to propose an AMP to address unpaid balances of natural gas customers;⁴ and (3) requiring utilities to provide Deferred Payment Agreements (“DPA”) of at least 12 months to residential customers who qualify.⁵ WGL filed its proposal and implementation plan for its AMP on April 19, 2021.⁶ The District Department of Energy and the Environment (“DOEE”) filed comments on WGL’s AMP proposal on May 11, 2021.⁷ On May 27, 2021, the Commission issued Order No. 20749 directing that a technical conference be held to discuss WGL’s AMP and how the program will address “hard to access” accounts, accounts that have chronically past due balances and have become in essence “uncollectible.”⁸

3. On July 15, 2021, the Commission convened a virtual technical conference with the stakeholders to discuss WGL’s proposed AMP program.⁹ We heard directly from WGL and interested stakeholders regarding the AMP proposal. Participants raised concerns regarding hard access accounts, along with the open enrollment period for the program, the budget billing and energy efficiency programs in the AMP, reporting requirements related to the AMP, outreach

² RAD is the discount program offered by Pepco and first approved as the Residential Aid Rider (“RAR”) in *Formal Case No. 785, In the Matter of the Application of Potomac Electric Power Company for an Increase in its Retail Rates for the Sale of Electric Energy*, Order No. 7716 at 180, rel. December 29, 1982. The program offers eligible Pepco, D.C. residential customers a monthly credit – the Residential Aid Credit (“RAC”). The RAC covers the following charges: the full customer charge and energy charge for distribution; and exemption from the following surcharges: the Residential Aid Discount Surcharge, the Sustainable Energy Trust Fund, and the Energy Assistance Trust Fund. Credits for these charges are individually listed on the customers’ bills as “RAC – Distribution” and “RAC Surcharges.” The full RAC is equal to approximately 30% of a typical RAD customer’s bill.

³ RES is the discount program offered by Washington Gas Light Company and was approved in *Formal Case No. 840, In the Matter of the Application of District of Columbia Natural Gas, A Division of Washington Gas Light Company for Authority to Increase Existing Rates and Charges for Gas Service*, Order No. 8569 at 84, 87, rel. September 5, 1986. This program offers a discount on the distribution portion of the customer’s bill through the winter months from November through April. The discount is achieved through a percentage reduction of the distribution portion of a customer’s bill, resulting in an approximately 100% reduction in that portion of the bill. The RES additionally provides for an automatic short-term increase in the reduction to the distribution portion of the bill when purchased gas prices rise above a specified historic percentage.

⁴ Arrearage Management Plans frequently combine energy efficiency offerings, budget billing, and arrearage forgiveness in an effort to assist limited-income customers in arrears.

⁵ *Formal Case No. 1164*, Order No. 20707, ¶ 6; Order No. 20749, ¶ 11.

⁶ *Formal Case No. 1164*, Washington Gas Light Company’s Arrearage Management Program Proposal, filed April 19, 2021 (“WGL’s Proposed AMP”).

⁷ *Formal Case No. 1164*, Department of Energy and Environment’s Comments Regarding WGL’s AMP Proposal, filed May 11, 2021 (“DOEE AMP Comments”).

⁸ Order No. 20749, ¶ 14.

⁹ *Formal Case No. 1164*, Public Notice of July 15, 2021, Technical Conference on Washington Gas Light Company’s Arrearage Management Program, rel. July 6, 2021. Stakeholders in attendance included: DOEE, OPC, Pepco, the Apartment & Office Building Association of Metropolitan Washington (“AOBA”) and WGL.

programs, the status of WGL's Maryland AMP program,¹⁰ and how WGL could coordinate with DOEE to gain access to additional funding through STAY DC.¹¹ OPC filed comments on July 21, 2021.¹²

III. WGL'S PROPOSED ARREARAGE MANAGEMENT PROGRAM

4. WGL states that its proposed AMP was developed in combination with the Company "work[ing] with thousands of its customers during the pandemic to ensure continuation of natural gas service and to minimize financial hardship."¹³ According to the Company, its proposed AMP is "designed to help customers: (1) lower or eliminate existing COVID-19 related arrearages; (2) bring accounts current; (3) improve payment behavior on customers' new bills; and (4) avoid disconnection and allow customers to remain current in their Company payment obligations."¹⁴ Like most COVID-19 related plans throughout the Washington Metropolitan Area, WGL states that the plan "will provide simultaneous arrearage forgiveness of participating customers' existing arrearage balances."¹⁵ After an eligible customer enrolls in the program and timely pays each new monthly amount due, the Company will grant a pro-rated monthly arrearage reduction amount toward the goal of full arrearage elimination at the end of the 12 month period, with a few potential months of a "grace period" to allow for receipt of late payments. The Company proffers the following guidelines under its proposed AMP:

- a. The utility will forgive one-twelfth (1/12) of the pre-program arrears each month that customers pay their new bill in full and on time.
- b. Customers may miss up to two consecutive full-and-on-time monthly payments and remain in the program, but a third consecutive missed payment would cancel the customer's AMP program.

¹⁰ See Order No. 89682 at 2, *Impacts of COVID-19 Pandemic on Maryland's Gas and Electric Utility Operations and Customer Experiences*, (Public Conference 53, December 2020) (The Maryland Public Service Commission issued a Notice and Request for Arrearage Program Proposals, and many parties, including WGL, filed an AMP on October 7, 2020. The Maryland PSC rejected the AMP without prejudice in order to allow the parties to refile amended versions of the AMP in the future.).

¹¹ See *STAY DC*, Gov't of the District of Columbia, Muriel Bowser, Mayor, <https://stay.dc.gov> (last visited July 16, 2021).

¹² *Formal Case No. 1164*, Office of the People's Counsel's Comments on Washington Gas Light Company's Arrearage Management Plan Proposal, filed July 21, 2021 ("OPC's AMP Comments").

¹³ WGL's Proposed AMP at 2.

¹⁴ WGL's Proposed AMP at 4.

¹⁵ WGL's Proposed AMP at 4.

- c. A customer's AMP will be successfully completed when he or she makes 12 months' worth of bill payments, at any time between the 12th and 15th month after enrollment.¹⁶

The Company states that those customers who miss one or two consecutive payments can stay in the plan by being able to "make up" those payments to complete the AMP. Paying the full bill due at a time after missing one monthly payment "would earn a customer two monthly arrearage credits, each worth 1/12th of the pre-program arrearage amount."¹⁷ Even if a customer misses a third consecutive payment, the Company stated at the technical conference that a customer can still take advantage of other programs WGL has in place to reduce arrearages. A customer's "monthly goal will be paying the total amount due on the bill, thereby making the earned AMP credits for those monthly payments permanent (no retroactive removal will occur based on a customer not completing the AMP), unless a payment submitted to earn that credit is subsequently returned for insufficient funds or some other reason."¹⁸

5. WGL indicates that its AMP will assist customers to "avoid accruing additional debt while steadily working down their arrearage balances."¹⁹ WGL states, "[t]he AMP plan is designed to provide relief to impacted customers and will be limited in duration to address the financial hardships bought on by the COVID-19 pandemic."²⁰

6. **Eligibility.** According to WGL's proposal, an eligible AMP customer is one who is at least 60 days past due, with a maximum arrearage of \$3,000; however, customers with higher arrearages could become eligible after paying or receiving assistance from other eligible sources on the amounts that exceed the cap in the AMP program.²¹ In addition, to qualify for the program, a customer must have been approved by DOEE for assistance within 12 months before applying for the AMP program, and DOEE currently uses an income threshold of 80% AMI, as determined by Order No. 20749.²² According to the AMP, customers would be required to enter the Company's Budget Billing plan as a condition of enrolling in the AMP and must agree to "be offered the benefits of any Energy Efficiency programs offered by either the Company or the Sustainable Energy Utility ("SEU")."²³ WGL states that this requirement would assist in reducing

¹⁶ WGL's Proposed AMP at 4.

¹⁷ WGL's Proposed AMP at 5.

¹⁸ WGL's Proposed AMP at 5.

¹⁹ WGL's Proposed AMP at 3.

²⁰ WGL's Proposed AMP at 3.

²¹ WGL's Proposed AMP at 5.

²² Order No. 20749, ¶¶ 1, 6-7; WGL's Proposed AMP at 6.

²³ WGL's Proposed AMP at 6.

service usage and bill amounts.²⁴ WGL proposes to target customers eligible for its RES program, as these customers are most vulnerable to the negative impacts of COVID-19.²⁵

7. **Enrollment.** WGL indicates that as soon as the Company is able to launch the program, it will open enrollment within 60 days after approval from the Commission.²⁶ WGL also states that “enrollment in the proposed AMP will close six months after the Company implements its program” to be “consistent with the AMP’s plan to offer customers relief from debts incurred specifically due to the pandemic-related showdown.”²⁷ WGL reiterated its stance at the July 15th technical conference. In addition, WGL indicates that it will expand its current Washington Gas CARES efforts to develop an outreach and communication plan to inform and educate customers about the program and how to apply for eligibility in the program.²⁸

8. **Completion and Default.** WGL states that the proposed AMP duration for each participant will be the lesser of: (1) the time needed for the customer to pay 12 months of billed amounts from the time of enrollment; (2) the third consecutive month a customer fails to pay their full billed amount by the due date; (3) the date the Company closes the account of a customer who has been disconnected for non-payment of newly incurred charges (not including pre-program arrears) without making payments required for reconnection; or (4) the date a customer voluntarily stops service with the Company and closes his or her account (*e.g.*, due to a move out of the Washington Gas service territory, or into a residence where the customer is no longer responsible for bill payment).²⁹ According to WGL, a customer is considered in default when he or she breaches conditions 2 through 4.³⁰

9. **Collection Procedures.** If a customer defaults on the AMP and experiences a disconnection, WGL’s proposal states that the customer will still be allowed to continue his or her AMP if required payments are made to restore service before the account is closed.³¹ However, the AMP will default and all charges, including unpaid charges incurred during the program, would become due if an account is closed before completion.³² Those customers will be “presented with a final bill for all past-due amounts that include any pre-program arrears not yet retired, any new

²⁴ WGL’s Proposed AMP at 6.

²⁵ WGL’s Proposed AMP at 6.

²⁶ WGL’s Proposed AMP at 7.

²⁷ WGL’s Proposed AMP at 7.

²⁸ WGL’s Proposed AMP at 8.

²⁹ WGL’s Proposed AMP at 8.

³⁰ WGL’s Proposed AMP at 8.

³¹ WGL’s Proposed AMP at 9.

³² WGL’s Proposed AMP at 9.

arrears included during the AMP plan, and any unbilled new charges calculated when the service is canceled.”³³

10. **Benefits.** The Company states that it is prepared to implement the AMP as quickly and cost-effectively as reasonably possible in order to provide much-needed assistance to a very vulnerable set of customers struggling through a historically challenging time.³⁴ WGL contends that the AMP will benefit those “who may have experienced financial hardship during the pandemic” and helps “vulnerable customers keep the gas on while moving past an arrearage that otherwise could have burdened them for years or forced them to make painful choices between other pressing financial needs.”³⁵

11. **Cost Recovery.** WGL proposes to recover its costs for the plan through the existing RES surcharge.³⁶ According to WGL, the surcharge is subsidized by non-RES customers of the Company, and the existing RES surcharge would provide an efficient method for the collection of costs.³⁷ WGL indicates that the costs will include: “the amount of debt forgiven, any required changes to the Company’s billing as well as associated IT changes, the cost of any communications developed for customers, and other costs to administer the program.”³⁸

IV. RESPONSIVE COMMENTS ON PROPOSED AMP

12. **DOEE.** On May 11, 2021, DOEE filed comments generally supporting the Company’s proposed AMP. However, DOEE proposed several modifications to improve the proposal. DOEE stated that WGL continues to tie RES eligibility to the 60% state median income (“SMI”) threshold, and this should be amended once the Commission approves the 80% AMI threshold.³⁹ DOEE also opposed the requirement that AMP participants be placed on equal billing installments since those customers will be paying in advance for gas service if they enroll outside of the winter months.⁴⁰ DOEE expressed concern with WGL conditioning entrance into its AMP on customers agreeing to participate in Energy Efficiency programs, even though some customers may not own their homes.⁴¹ Thus, these customers lack the authority to furnish their gas usage

³³ WGL’s Proposed AMP at 9.

³⁴ WGL’s Proposed AMP at 10.

³⁵ WGL’s Proposed AMP at 10.

³⁶ WGL’s Proposed AMP at 10.

³⁷ WGL’s Proposed AMP at 10.

³⁸ WGL’s Proposed AMP at 10.

³⁹ DOEE AMP Comments at 2 (The Commission adopted the 80% AMI threshold in Order No. 20749, ¶¶ 1, 6-7).

⁴⁰ DOEE AMP Comments at 2.

⁴¹ DOEE AMP Comments at 3.

data to these programs.⁴² Finally, DOEE opposed a provision in the AMP program to only offer it for six months after the Company implements the program.⁴³ According to DOEE, this is an “unreasonably short” time, and the Commission should direct that the program is open for enrollment for six months after approval or until the Commission reverts to the 60% SMI threshold, whichever is later.⁴⁴

13. **OPC.** On July 21, 2021, OPC filed a letter in response to WGL’s AMP program.⁴⁵ OPC believes that, with certain modifications, WGL’s AMP is an important vehicle for consumers to get on track with paying their bills. OPC states that the proposed maximum arrearage amount should be increased because its internal records show that many customers have arrearage amounts above \$3,000.⁴⁶ OPC also states that the proposed 6-month enrollment period should be extended because many customers’ economic hardships will last longer than WGL’s proposed enrollment period.⁴⁷ Further, OPC indicates that WGL may have included incorrect or inaccurate data in its proposed AMP since DOEE reported that there are more consumers who are struggling with gas bills than reported by WGL.⁴⁸ Finally, OPC states that the costs or bill impacts of implementing the program should be clarified because the costs should remain at the lowest possible level.⁴⁹

V. DECISION

14. In Order No. 20707, the Commission directed WGL to propose an AMP to address unpaid balances of natural gas customers once the public health emergency is lifted. After WGL filed its proposed AMP, the Commission held a technical conference for stakeholders to discuss the AMP and for WGL to address any concerns about its AMP. The Commission commends the stakeholders who participated in the technical conference and for filing responsive comments. Although no stakeholder opposed WGL’s proposed AMP, DOEE and OPC proffered changes as discussed below.

15. DOEE and OPC expressed concerns that the six-month open enrollment period is unreasonably short for low-income customers.⁵⁰ We agree. On July 25, 2021, the Mayor lifted

⁴² DOEE AMP Comments at 3.

⁴³ DOEE AMP Comments at 3.

⁴⁴ DOEE AMP Comments at 3.

⁴⁵ *Formal Case No. 1164*, OPC’s Comments on WGL’s Arrearage Management Plan, filed July 21, 2021 (“OPC’s AMP Comments”).

⁴⁶ OPC’s AMP Comments at 1.

⁴⁷ OPC’s AMP Comments at 1.

⁴⁸ OPC’s AMP Comments at 2.

⁴⁹ OPC’s AMP Comments at 2.

⁵⁰ DOEE AMP Comments at 3.

the public health emergency and extended the public emergency allowing, among other things, the District to continue receiving federal funds for the STAY DC program and to request other federal disaster assistance.⁵¹ On July 13, 2021, the Council of the District of Columbia enacted emergency legislation phasing out the moratorium on utility disconnections beginning October 12, 2021.⁵² After that date, a customer may be disconnected if: (1) the utility has engaged the customer through notification; (2) the customer owes more than \$600; (3) the customer has not entered into a payment plan, is not meeting the terms of a payment plan, or is more than 2 months behind on an existing payment plan; (4) the customer has not requested to enter into a payment plan or more than 45 days have elapsed following the customer's initial request after October 12, 2021; or (5) the customer has not provided documentary evidence that he or she qualifies for utility disconnection relief through STAY DC, the Low-Income Home Energy Assistance Program ("LIHEAP"), the Commission's UDPs, or the District's Water Emergency Relief Program.⁵³ Once the moratorium ends, some customers may still be unable to pay their past-due bills.

16. The Commission put into place temporary enhanced ratepayer protection options in Order Nos. 20707 and 20749 to assist customers and believes that WGL's AMP provides another option for customers to pay their gas bills and bring those accounts current. We, therefore, believe that WGL's AMP should remain open for enrollment at least 12 months from the date of the AMP's implementation. As OPC indicates, this change will likely cause costs for the program to be slightly elevated,⁵⁴ but the added costs can still be recovered through the existing RES surcharge. We believe that the additional six (6) months enrollment period will provide needed assistance to customers impacted by the COVID 19 pandemic. Therefore, the Commission approves a 12-month enrollment period for WGL's AMP program. However, if the Commission decides to continue WGL's AMP beyond the one-year enrollment period, recovery of arrearage expenses through the RES surcharge will be reassessed since these expenses include the commodity portion of customer bills, not just distribution costs.

17. OPC states that the arrearage balance should be increased above the \$3,000 arrearage cap for participation in WGL's AMP.⁵⁵ In this instance, however, we will approve WGL's \$3,000 arrearage cap threshold. But, we direct WGL to undertake all efforts to extend the AMP program to WGL's "hard access accounts" that are above the \$3,000 arrearage cap. As WGL indicates, these otherwise qualifying customers with higher arrearages may enroll after paying or receiving assistance from other eligible sources on the portion of their arrearage balance that exceeds that cap amount. WGL should prioritize these accounts through direct customer contact, including bill inserts, specifically advising the hard to access customers of the energy bill assistance available through the DOEE's LIHEAP program and the DC STAY (utility arrearage

⁵¹ Mayor's Order 2021-096, III, 3.a (July 24, 2021).

⁵² D.C. Act 24-125, Public Emergency Extension and Eviction and Utility Moratorium Phasing Emergency Amendment Act of 2021, § 3(h), effective July 24, 2021 ("Emergency Act 24-125")

⁵³ Emergency Act 24-125, § 3(j)(1)-(2).

⁵⁴ OPC's AMP Comments at 2.

⁵⁵ OPC's AMP Comments at 1.

funds available through the Emergency Rental Assistance Program) funding dollars available through the D.C. Government. This initiative will allow WGL to service those customers who have arrearages exceeding \$3,000 who would potentially benefit from enrollment in the AMP program.

18. WGL proposes that potential AMP participants enroll in budget billing and consent to being offered assistance through Energy Efficiency programs that are offered by WGL or the SEU.⁵⁶ Energy Efficiency programs are those programs designed to inform customers of how to lower bills due to their electric or gas usage. DOEE contends that customers could be discouraged from completing the AMP if their bills are higher than they otherwise would be if AMP participation were tied to actual usage, and customers would be mandated to participate in those Energy Efficiency programs if they consent to be a part of AMP.⁵⁷ DOEE also argued that many low-income customers do not own their homes and therefore could not participate since they have no authority to join an Energy Efficiency program. WGL explained that participation in the Energy Efficiency programs would not be mandated but would only be encouraged, so customers can reduce energy usage and reduce bills even further. WGL proposes that customers “be offered the benefits of any Energy Efficiency programs offered by either the Company or the SEU, as a precondition of enrolling in the AMP.” The Commission also approved budget billing enrollment when we approved Pepco’s AMP,⁵⁸ and we see no reason why that should change here. This would benefit customers by assisting in reducing future usage and bill amounts, which would increase the likelihood that customers will be able to manage future bills going forward.⁵⁹ We also approve the offering of the benefits of Energy Efficiency programs to customers who enroll in the AMP.

19. During the technical conference, DOEE suggested that the Commission grandfather in all RAD and RES FY 2021 participants and waive recertification requirements in both Pepco’s and WGL’s tariffs to capture more customers who may need assistance. WGL’s tariff provides that customers will only be entered into its discount programs through an eligibility process set by DOEE and that eligibility “shall be established *each year* on a first-come, first-served basis.”⁶⁰ However, we agree with DOEE that participants should not have to re-certify for discount

⁵⁶ WGL’s Proposed AMP at 6. WGL represents that Budget billing is a fixed, monthly bill that serves to offset large bills during winter months and helps customers complete the AMP program successfully.

⁵⁷ DOEE AMP Comments at 3.

⁵⁸ *Formal Case No. 1119, In the Matter of the Joint Application of the Exelon Corporation, Pepco Holdings, Inc., Potomac Electric Power Company, Exelon Energy Delivery Company, LLC and New Special Purpose Entity, LLC for Authorization and Approval of Proposed Merger Transaction* (“*Formal Case No. 1119*”), Order No. 18799, ¶ 16, rel. June 15, 2017 (“*Order No. 18799*”).

⁵⁹ *Formal Case No. 1119, In the Matter of the Joint Application of the Exelon Corporation, Pepco Holdings, Inc., Potomac Electric Power Company, Exelon Energy Delivery Company, LLC and New Special Purpose Entity, LLC for Authorization and Approval of Proposed Merger Transaction* (“*Formal Case No. 1119*”), Order No. 18799, ¶ 16, rel. June 15, 2017 (“*Order No. 18799*”).

⁶⁰ Washington Gas Light Company, Rate Schedules and General Service Provisions for Gas Service in the District of Columbia, Ninth Revised Page No. 4 (emphasis added).

programs for FY 2022, given the impact that COVID-19 has had on customers who may have lost their jobs and are in dire need of assistance with paying utility bills. Therefore, the Commission, *sua sponte*, waives the requirements in WGL's tariff related to the RES program requiring customers to re-certify in order to participate.⁶¹ This waiver is temporary and only applies to FY 2021 participants who would normally be required to recertify for participation in the discount programs for FY 2022.

20. Customer outreach is an important part of WGL's proposed AMP. WGL indicates that its AMP is supported by its enhanced outreach efforts through the Company's CARES program which also informs customers about assistance programs and payment options to help address COVID-19 related arrears and urges customers to engage with the Company to determine the available options to assist them.⁶² The Commission commends WGL for committing to outreach efforts through its CARES program, but this may not be enough. Thus, the Commission directs the Company to prepare appropriate bill inserts to explain the operation and effect of the AMP on residential customers and to minimize customer confusion regarding the implementation of a specific program to address arrears. On the bill inserts, WGL must explain the benefits of its AMP and how customers can contact the Company if they want to enroll in the program. We also direct that WGL and DOEE advertise the AMP on their websites, in customer letters, and on their social media platforms to further notify ratepayers. Further, we direct that WGL should send mailings and marketing materials to RES and non-RES participants who meet the arrearage threshold. WGL should also send this material to all customers whose accounts are labeled "hard access," which could allow these ratepayers to eventually enroll in WGL's AMP initiative. Finally, WGL is directed to send all marketing materials to those customers who were subject to disconnection before the Mayor declared a public health emergency in the District on March 2020.

21. Because these changes will affect WGL's tariff provisions regarding discount programs, the Commission directs WGL to file new tariff provisions establishing its AMP program within 60 days from the date of this Order. WGL presently files reports in Docket No. ARDIR2021, which, among other things, includes the number of customer issued disconnection notices within a given month. As such, we direct WGL to amend its monthly ARDIR reports to include AMP information about customer participation levels and arrearage balances. The Commission, along with stakeholders, will evaluate the program in its third quarter to determine whether we should extend the AMP program beyond one year; therefore, the Commission directs WGL to make quarterly compliance filings that address the performance of WGL's proposed AMP after implementation of the AMP.

⁶¹ The Commission also, *sua sponte*, waives recertification requirements in Pepco Rate Schedules for Electric Service in the District of Columbia, Residential Aid Discount – Rider "RAD," Tenth Revised Page No. R-29 to the extent an annual recertification is required.

⁶² WGL's Proposed AMP at 3.

THEREFORE, IT IS ORDERED THAT:

22. Washington Gas Light Company's proposed Arrearage Management Program is **APPROVED**, consistent with the determinations contained in this Order;

23. Washington Gas Light Company's Arrearage Management Program's enrollment period **SHALL** remain open for at least one year after the program is implemented;

24. Cost recovery for the Arrearage Management Program is **DIRECTED** to occur through the Residential Essential Service surcharge;

25. The provision in the Arrearage Management Program concerning the \$3,000 arrearage cap for entrance into the program is **APPROVED**;

26. The Washington Gas Light Company is **DIRECTED** to make all efforts to extend the Arrearage Management Program to hard access accounts above the \$3,000 arrearage cap by informing these customers of other programs to decrease their balance, so they can take advantage of the program;

27. The provisions in the Arrearage Management Program related to budget billing and participation in Energy Efficiency programs are **APPROVED**;

28. The Commission, *sua sponte*, **WAIVES** the tariff provisions related to the requirement for the annual recertification for participation in the Residential Essential Service and Residential Aid Discount programs to eliminate the requirement for customers to recertify for the program for FY 2022 only;

29. The Washington Gas Light Company is **DIRECTED** to include bill inserts on gas service bills to advertise the Arrearage Management Program;

30. The Washington Gas Light Company and the Department of Energy and Environment are **DIRECTED** to advertise the Arrearage Management Program on their websites, in customer letters, and on social media platforms;

31. The Washington Gas Light Company is **DIRECTED** to send marketing materials to all customers who meet the arrearage threshold or who were subject to disconnection before the Mayor declared a public health emergency in March 2020 and to all customers who have hard access accounts;

32. The Washington Gas Light Company is **DIRECTED** to file new tariff provisions regarding the Arrearage Management Program and to amend its ARDIRs to include information about customer participation levels and arrearage balances; and

33. The Washington Gas Light Company is **DIRECTED** to file quarterly compliance reports on the implementation of the Arrearage Management Program.

A TRUE COPY:

BY DIRECTION OF THE COMMISSION:

A handwritten signature in black ink, reading "Brinda Westbrook-Sedgwick". The signature is written in a cursive style with a large initial 'B'.

CHIEF CLERK:

**BRINDA WESTBROOK-SEDGWICK
COMMISSION SECRETARY**